

- RECORD #1061 DETAIL

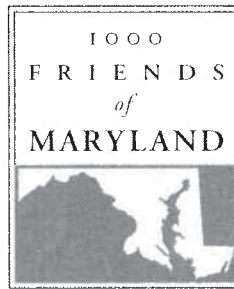
First Name : Douglas
Last Name : Stewart
Business Name : 1000 Friends of Maryland
Address : 1209 North Calvert Street
City : Baltimore
State : MD
Zip Code : 21202
Email Address : DOUGLAS@FRIENDSOFMD.ORG
Submission Content/Notes : 1000 Friends of Maryland submits the attached comments for inclusion in the record on the proposed Purple Line project.

Thank you.

Douglas Stewart
Development and Communications Director
1000 Friends of Maryland
1209 North Calvert Street
Baltimore, MD 21202
410-385-2910 x11
www.friendsofmd.org

Attachments :

Protecting natural areas -- Restoring vibrant communities
1000 Friends of Maryland.pdf (44 kb)



December 15, 2008

Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Re: Purple Line DEIS

Dear Ms. Ratcliff:

Thank you for this opportunity to comment on the proposed Purple Line project. 1000 Friends of Maryland works to protect natural areas, improve public transportation and restore vibrant towns and cities through education, research and advocacy. We support a light rail Purple Line. Light rail is the best way to ensure smarter growth, and over time will more than repay the added investment.

More than 409,000 additional households and 582,000 new jobs are expected to come to Maryland's Baltimore-Washington region between now and 2030. The Bethesda – New Carrollton corridor will continue to add significant numbers of people and jobs in the next twenty years. When combined with supportive land use policies, transit can be a catalyst for revitalizing nearby communities and stimulating economic development. This in turn leads to more focused growth and will curb the dispersed development patterns that negatively affect the health of the Bay.

It's important to take a long view when planning projects like this, since the economic, social and environmental impacts will be so deep and long-lasting. To maximize ridership and to most benefit nearby communities, transit must be planned in conjunction with land use policies that encourage compact, mixed-use, walkable development. Light rail is the best option for spurring transit-oriented development.

A well-planned transit system coordinated with supportive land use policies can transform a community and bring a huge return on investment for local governments and the state. As one of the state's fast growing corridors, the Bethesda-New Carrollton area merits a significant investment in transit that will leverage needed land use changes, and the investment should be in rail.

Yours sincerely,

Dru Schmidt-Perkins
Executive Director

- RECORD #1263 DETAIL

First Name :	Douglas
Last Name :	Stewart
Business Name :	1000 Friends of Maryland
Address :	1209 N. Calvert Street
City :	Baltimore
State :	MD
Zip Code :	21202
Email Address :	

Submission Content/Notes : Good afternoon. Douglas Stewart, D-O-U-G-L-A-S, S-T-E-W-A-R-T. I'm here speaking on behalf of One Thousand Friends of Maryland. We are a statewide organization to protect natural areas, improve public transportation and restore vibrant towns and cities through education, research and advocacy.

The Washington Baltimore region in Maryland is the most rapidly growing part of the state and it will continue to be the most rapidly growing part of the state over the next years. We urgently need transit to relieve traffic congestion today and in the future. As one of the fastest growing corridors, one of the fastest growing corridors in this region, this area needs transit particularly urgently.

We need to have a first class transit system here to really bring more development as an environmental solution that will bring more growth here and will not only reduce our global warming emissions, but it will also take more development pressure off areas along the Chesapeake Bay watershed.

When combined with supportive local land use policies, transit here can be a catalyst for revitalizing nearby communities and stimulating economic development.

We think it's important to take a long view when planning projects like this since the economic, social and environmental impacts will be so deep and long lasting.

To maximize ridership and to benefit nearby communities, transit must be planned in conjunction with land use policies that encourage compact mixed use walkable development.

So we think the effect that the scenarios will have on nearby land uses are extremely important, although they can be difficult to quantify.

A well planned transit system can transform a community and bring a large return on investment for local governments and the state, and it will spur more walking and bicycling trips that will replace car trips.

If we just looked across the river at the Arlington Roslyn Boston Corridor, we can see the benefits of taking a long view. If there, and just simply as an example, not in terms of their particular decisions or alignments, but if they had been thinking about the cheapest system like some other localities actually had, there would not be nearly as, the Roslyn Boston Corridor would not be nearly as vibrant and prosperous as it is today.

It has absorbed a huge amount of development and economic growth with only modest increases in traffic. So I think we should heed that example.

As one of the state's fast growing corridors, this area merits a significant investment in transit. If done right and with a long view, transit and smart growth policies will leverage huge gains for nearby communities and the economy.

We urge the state to look closely not just at ridership and cost effectiveness, but also which of the options has the most potential to spur economic development and revitalization in the surrounding communities. Thank you.

- RECORD #1247 DETAIL

First Name :	Hans
Last Name :	Riemer
Business Name :	Act for Transit
Address :	634 Ritchie Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Hi, I'm Hans Riemer. That's H-A-N-S, R-I-E-M-E-R. I'm a resident of East Silver Spring. I am Vice President of the Action Committee for Transit. I'm a member of Silver Spring Advocates, past member of the Long Branch Citizens Advisory Board.

I'm here to say first that I'm confident that a light rail purple line, and I believe that light rail is the only mode that can achieve this, will make East Silver Spring a much better place to live.

First, I imagine the trails. We will finally have a completed trail from Silver Spring to Bethesda. That will be an enormous benefit to the community and I cannot wait to get on my bike and bring my family along for a trip.

The chance for a smooth light rail connection trip to Rockville, to Bethesda, or up the 270 corridor. All of those will be possible as a result of the light rail, of the purple line, bringing enormous benefit to the residents of East Silver Spring and the downtown area.

Going in the other direction, College Park. The University will finally be within reach as a community benefit for people who live here, whether that's seminars and classes and events or sporting events. All manner of opportunities will really be close at hand without getting on the beltway and slogging through that horrible traffic.

Perhaps most importantly, it will allow the continued improvement and growth of downtown Silver Spring without requiring more cars.

With the light rail purple line, people can live throughout the Montgomery County or in Prince George's County and get into downtown Silver Spring easily, walk to work from the station. They won't have to drive. That will keep more cars off of our local roads. We'll have cleaner air and a stronger community as a result.

One thing I would say is I strongly believe we need a stop. It would be unfortunate if the purple line were to come through our community without a place for us to get on except for the downtown Metro station.

I urge you to include a stop in Silver Spring for the benefit that it will provide.

I would like to call your attention to the fact that the students of Montgomery County, recently the high school students unanimously endorsed the purple line, 21 high school government organizations.

They want change and they are tired of the fact that Montgomery County is a community planned around the automobile. They want to see a significant change in direction.

We heard from one testifying in College park recently. They want to see a green transportation infrastructure, not just an automobile transportation infrastructure.

The last thing I would implore you to do is please act fast. This economy is on a downward path. It could be several years before we get to the upswing and we don't know how low we're going to go.

If we move quickly, we may be able to secure federal funds as part of an Obama administration stimulus initiative. Let's get this thing moving and let's get it moving now. Thank you.

- RECORD #2713 DETAIL

First Name :	Ben
Last Name :	Ross
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Submission Content/Notes :	
Attachments :	Action Committee for Transit.pdf (357 kb)

Action Committee for Transit

www.actfortransit.org

P.O. Box 7074, Silver Spring, MD 20907

January 12, 2009

Ms. Diane Ratcliff
MTA Office of Planning
6 St. Paul St., 9th Floor
Baltimore, MD 21202

Subject: Purple Line DEIS – Substantive comments

Dear Ms. Ratcliff:

I am pleased to submit the substantive written comments of the Action Committee for Transit on the Purple Line Draft Environmental Impact Statement. We have previously provided oral comments at the New Carrollton public hearing and two written comments on procedural aspects of the DEIS, the selection of alternatives, and the interpretation of “Save the Trail” petitions.

The Action Committee for Transit strongly endorses light rail as the mode and urges construction of the Purple Line on the fastest possible schedule. Light rail transit is the best way to achieve the purpose and need of providing mobility and accessibility in the corridor connecting Bethesda, Silver Spring, Langley Park, College Park, and New Carrollton.

We believe that the Locally Preferred Alternative should combine the best aspects of the High and Medium light rail alternatives, including:

- The above-ground Campus Drive alignment through the University of Maryland
- The above-ground Wayne Avenue alignment in East Silver Spring. Analysis of the Thayer Avenue alignment provides an adequate basis for determination of whether there is a need for tunneling in East Silver Spring to provide faster travel times. Tunneling under Wayne Avenue is inferior to the Thayer Avenue alignment and the project should not be delayed for additional study of the Wayne Avenue tunnel option.
- Two parallel trail routes through downtown Bethesda, one elevated through the tunnel under Wisconsin Avenue and the other at grade along Bethesda and Willow Avenues.

The light rail Purple Line has so many virtues that we could not describe them all without making these comments inordinately long. The analysis in the DEIS makes it clear that light rail is by far the best alternative for this project. We applaud the careful work by MTA and its contractors reported in that document. We will limit these comments to a few salient points where the analysis in the DEIS deserves emphasis or supplementation.

Only light rail has adequate capacity – If so-called “bus rapid transit” is selected as the mode, it will reach capacity around the 2030 time frame of the DEIS analysis. An investment on the scale being made here needs to consider a 50 to 100 year time frame. Only light rail has the capacity to meet future needs.

Montgomery County highway management policy precludes bus rapid transit – An essential precondition for operation of any bus rapid transit system is that buses have priority

over other traffic. However, Montgomery County's road management policy is to treat all vehicles equally, whether they are a single-occupant automobile or a bus with 60 or even 100 passengers. Five weeks ago, we sent County Executive Leggett a list of ten locations where bus priorities could substantially improve bus service without significant negative impact on automobile traffic. (See enclosure.) We have not received any response to this letter. As long as Montgomery County maintains its current policies, bus rapid transit is simply an impossibility.¹

Environmental impacts of BRT – The likely propulsion mode for bus rapid transit is some form of diesel. (The so-called hybrid electric vehicle is powered by a diesel engine.) Diesel exhaust creates a significant health risk which does not exist with light rail. Also, we question the DEIS's statement that BRT “vehicles are typically fueled with low emission hybrid electric motors or Compressed Natural Gas.” Based on current bus procurement plans, diesels will still be in local bus fleets until near or past 2030. The cost and emissions advantages of hybrids are greatest in stop-and-go operation, so agencies with mixed fleets will use their hybrids on regular routes and diesels on BRT routes.

Ridership at University of Maryland – We believe that light rail ridership at the University of Maryland will be substantially higher than estimated in the DEIS. The ridership model used in the DEIS does not include a special module for estimating student ridership, but is based on the regional model which emphasizes home-to-work trips. The resulting ridership estimates show more boardings at the future East Campus stop than at Campus Center. Common sense suggests that, because the total number of students and employees on the Maryland main campus exceeds the projected employment and housing at East Campus, and students have very high transit mode shares, the boardings at Campus Center should be higher than East Campus. We encourage MTA to include a student ridership module in the FEIS ridership model, and we urge consideration of the likely increase in predicted ridership when the Locally Preferred Alternative is selected.

Relationship of gasoline prices to ridership – The ridership models used in the DEIS are calibrated against past transportation patterns. There is an implicit assumption in the resulting ridership predictions that the price of gasoline will be the same in the forecast period as it was at the time of calibration. But we are approaching a peak in world oil production (if we did not reach it before demand was suppressed by the current economic crisis), and consequently real gasoline prices are likely to increase over time. The consequence of increasing real gasoline prices will be transit ridership that exceeds predictions based on constant real gasoline prices. We do not believe that there are sufficient data to make a quantitative prediction of the increase in ridership that will result from rising gasoline prices. However, we recommend that the FEIS explicitly identify the time period which was used to calibrate the ridership model and state what the average gasoline price was at that time. This will allow readers and decision-makers to consider the likely increase in ridership above calculated numbers and the resulting risk that bus rapid transit will have insufficient capacity to meet demand.


Operating costs – Light rail per-passenger operating costs decline with increasing ridership to a much greater degree than bus rapid transit. Consequently, consideration of higher ridership due to the factors discussed above and inclusion of post-2030 time frames will make operating cost comparisons more favorable to light rail. Also, we suspect that further analysis may show Purple Line

¹ This policy also precludes implementation of the TSM alternative. Consequently, no-build rather than TSM should be used as a baseline from which project benefits are calculated.

characteristics resembling other cities where light rail O&M costs have been lower than BRT costs at the ridership levels predicted in the DEIS.

In conclusion, we congratulate the MTA on its careful and thorough analysis of the environmental impacts of the Purple Line. We are convinced that the Purple Line will be a valuable enhancement to the natural and built environment of Montgomery and Prince George's Counties. We strongly encourage selection of light rail as the preferred alternative and construction of this project on the fastest possible schedule.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ben Ross", is centered within a light blue rectangular box.

Ben Ross
President

Action Committee for Transit

www.actfortransit.org

P.O. Box 7074, Silver Spring, MD 20907

December 7, 2008

Mr. Isiah Leggett, County Executive
101 Monroe Street
Rockville, MD 20850

Subject: Bus Rapid Transit - immediately and without cost

Dear Mr. Leggett:

Bus Rapid Transit has been widely advocated in recent weeks as an option for improving the county's transportation network. The Action Committee for Transit has identified numerous locations in the county where Bus Rapid Transit concepts could be put into service immediately, without any capital expenditure. A list of specific recommendations is attached.

We urge you to take immediate action on these items. Not only will they improve the speed and reliability of bus service, and thereby attract more riders, but they will yield cost savings for Ride-On and WMATA. We estimate that the aggregate annual saving, because bus drivers will spend less time waiting at traffic lights, would be in six figures.

The core concept of Bus Rapid Transit, which these measures exemplify, is that the movement of buses carrying large numbers of passengers is prioritized ahead of the movement of single-occupant vehicles. Without a policy of priority for buses, any Bus Rapid Transit plan is doomed to failure; the buses will be stuck in the same traffic as autos. Implementation of the attached list of actions will be a practical test of whether the institutional, political, and policy framework now existing in the county is compatible with successful implementation of BRT. We suggest that MCDOT staff suspend advocacy for BRT alternatives on the Purple Line and Corridor City Transitway rights of way pending the results of this experiment.

ACT has long been a strong supporter of Bus Rapid Transit concepts as a means of upgrading bus service. While buses cannot substitute effectively for rail on high-ridership trunk corridors, they are an essential part of our transit network and they need to be made better. The attached list of BRT actions offers a means of making transportation progress even in this time of fiscal stringency. We encourage you to move forward.

Sincerely,



Ben Ross
President

cc: Mr. Phil Andrews, County Council President
Mr. Royce Hanson, Planning Board Chair
Mr. Nat Bottigheimer, WMATA
Mr. Phil McLaughlin, MCDOT, Ride-On route planning

Bus Rapid Transit Concepts That Could Be Implemented Immediately

1. **Rockville:** At Church St./Hungerford Drive intersection, move stop line for cars approaching intersection on westbound Church Street to the east, beyond the driveway used by buses exiting the Metro station, so that buses leaving Metro station are not blocked by automobiles backed up at signal.
2. Reduce period of signal cycle at Church St./Hungerford Drive intersection to one-half of current duration (so that average wait until next green light is cut in half).
3. **Bethesda:** Reduce period of signal cycle from 100 to 50 seconds at Woodmont/Edgemoor and Old Georgetown/Commerce intersections where buses exit Metro station.
4. Adjust signal synchronization so that buses leaving Bethesda Metro and turning left onto Woodmont Ave. hit green lights when turning left onto Montgomery Ave. and at subsequent signals on Montgomery Ave.
5. **Medical Center:** Allow left turns by buses from northbound Rockville Pike onto Cedar Lane at all hours.
6. **Glenmont:** Increase the duration of the green signal for buses leaving the Metro station onto Georgia Avenue.
7. Adjust signal synchronization so that buses leaving Metro station and turning left onto Georgia Ave. hit green lights at subsequent intersections (Georgia/Layhill, Layhill/Glenallen, and Georgia/Randolph intersections).
8. Increase the duration of the green signal for left turns from southbound Georgia Ave. onto Randolph Road.
9. **Silver Spring:** Allow westbound buses on East-West Highway to use existing right-turn lanes to bypass queuing at Jones Mill Road and 16th Street. (This is an element of the TSM alternative in the Purple Line DEIS but can be implemented independently.)
10. **Montgomery College:** Move bus stops at Montgomery College's Germantown and Rockville campuses from beyond parking lots to directly in front of the academic buildings.

- RECORD #1127 DETAIL

First Name : Ben
Last Name : Ross
Business Name : ACT-Action Committee for Transit
Address : 4710 Bethesda Avenue, Apt 819
City : Bethesda
State : MD
Zip Code : 20814
Email Address :

Submission Content/Notes : I'm Ben Ross, B-E-N R-O-S-S, from 4710 Bethesda Avenue, Bethesda and I am speaking as President of the Action Committee for Transit.

We are a Montgomery County based group of almost 1,000 transit riders and transit supporters and we strongly support Light Rail for the Purple Line. It is what these two counties need badly.

We further urge you to look at both medium and high Light Rail options and pick out the best aspects of those two options and combine them. I think, in fact, that the Light Rail as you continue to study this will look even better than it looks now.

Our initial review, and we expect to be working with other people to submit written comments later, is that the Light Rail versus Bus Rapid Transit is more favorable in operating costs than your numbers now show. We also think that the ridership numbers will go up even more as you look more closely at the University of Maryland campus. This is an incredibly good project. We are so lucky that we have our major walkabout job centers, lined up in a row so that we can connect them.

I want to say one other thing. We'll be hearing about all the great things about this project from lots of speakers. We've already heard about it. But one thing that's very important to understand is that this is a project that did not come from the top.

As much as our elected officials have been giving tremendous support to it, this is something that has bubbled up from the grassroots. And it's the grassroots in both counties that have kept it moving forward.

This project has been like the "Perils of Pauline." It looked dead, several times. But it just has so much support from the average voter and the average commuter that it kept going forward.

Even a lot of the ideas, the Bethesda to Silver Spring idea of Light Rail came from citizens. The New Carrollton to College Park linkage came up, as I understand it, out of the ranks of the Prince George's County Department of Transportation. And we have to remember this is a People's Project. It's the pressure from the students at Maryland that have gotten that straightened out.

So we need to keep pushing for this. This is a terrific project and I'm looking forward to the next great day when we're back for a ground-breaking.

- RECORD #1427 DETAIL

First Name :	Geoff
Last Name :	Gonella
Business Name :	Alliance for Smart Transportation
Address :	PO Box 7580
City :	Silver Spring
State :	MD
Zip Code :	20907
Email Address :	

Submission Content/Notes : My name is Geoff Gonella. G-E-O-F-F, G-O-N-E-L-L-A. I'm a resident of Kensington, Maryland and serve as the volunteer executive director of the Alliance for Smart Transportation.

The Alliance represents over 300 citizens advocating for smart transportation solutions for Montgomery and Prince George's counties. We are not anti-transit, we are not anti-Purple Line. We are, however, dedicated to promoting fiscally responsible transportation planning that will bring traffic congestion relief with minimum impact on the environment and neighborhoods.

As such, the Alliance would like to highlight a few of our questions and concerns with this project. As the Purple Line plan is the subject of public discussion, we hear and read much about an ideal transit system. One which saves energy, runs clean, has minimal impact on the environment and nearby homeowners, reduces traffic and gets cars off the road. A system which will offer an option to frustrated commuters who will no longer spend more time in their cars as the region grows.

In fact, we would strongly support such a system. But as the DEIS makes very clear, the Purple Line is not that system.

First, as the DEIS states, the Purple Line will have no significant impact on reducing traffic congestion. In fact, we are concerned because of the proposed developments such as the 250,000 square foot project to Chevy Chase Lake that the Purple Line will actually increase traffic along major corridors such as Connecticut Avenue.

Second, this project is not cost-effective. According to state figures, the Purple Line will serve approximately 6,800 new riders, only 20 percent of the total with a price tag of close to 1.8 billion in 2007 dollars. That means the system will cost approximately 265,000 dollars per rider. Third, this project is obsolete before it even starts.

This project as presented will not service the huge expansion of the National Naval Medical Center in Bethesda and the projected 900,000 new car trips per year. Fourth, the project is not as environmentally friendly as been represented.

The Purple Line will be built over what is now largely residential and recreational green space, reducing public access to some of the last open space in Montgomery and Prince George's counties and requiring the destruction of a minimum of 1,000 mature trees.

The rail line will have a negative impact on the Capitol Crescent Trail, used by an estimated 10,000 individuals per week. Fifth, the Purple Line will negatively impact many neighborhoods along its route. Serious safety concerns are raised by highspeed trains traveling on residential streets alongside homes and yards, adjacent to school yards and pedestrian areas.

Finally, the Alliance believes that there are too many problems and unanswered questions with the proposed Purple Line. There are other projects such as the Corridor Cities Transitway that better meet the transportation needs of the region and corridors that are more critical to our future. We believe that this project, after 20 plus years of consideration, is beyond its useful life and is only still under consideration because of the stubborn, well-financed and well-connected sponsors.

Please consider the disconnect between the ideal clean, green fantasy and the reality of the system. We would all long to have the ideal, but the

reality of this system made clear in the DEIS is the Purple Line is not the answer. The Purple Line is an extravagance we can not afford in these difficult economic times. Thank you.

- RECORD #1430 DETAIL

First Name : Linda
Last Name : Skalet
Business Name : Bethesda Civic Coaliton
Address : 4821 Montgomery Ln #903
City : Bethesda
State : MD
Zip Code : 20814
Email Address :

Submission Content/Notes : Linda Skalet, Linda, L-I-N-D-A, S-K-A-L-E-T. I represent the Bethesda Civic Coalition, a group of residents of downtown Bethesda who came together in 2003 to oppose development in the central business district, not in compliance with the sector plan.

As the first generation of homeowners in Bethesda's business district, we feel a responsibility to shepherd continued growth in our neighborhood not only for ourselves but for all who enjoy this emerging, urban center. We feel ourselves to be in a unique position to understand the ramifications of the many dramatic changes that are being considered. Plans for the construction of the Purple Line are currently foremost among them.

Of MTA's 6 current alternatives, the only one we can support is alternative three, low investment bus rapid transit along Jones Bridge Road. We feel it would be most effective in alleviating current and future traffic problems, particularly those associated with BRAC without creating new traffic problems in Bethesda's central business district. Such would be the consequences of alternatives four and five, both of which bring bus rapid transit down the busiest stretch of retail, dining and entertainment in Bethesda row, the very blocks that we close, to all traffic 8 or weekends a year for cultural events. The result would be extreme traffic congestion and peril to pedestrians in this already dangerous area. Metro and the Bethesda Circulator trolley already do a fine job of transporting people in this vibrant and attractive neighborhood.

Our other concerns address quality of life and the creation of successful urban centers. No great city was ever created by eliminating all open space from its center. Without Woodmont East Park, the heart of Bethesda will have lost its primary gathering place. And similarly, no city has ever benefitted from the destruction of an irreplaceable urban forest like the Georgetown Branch Trail. We will never regret having preserved these treasured elements of our city but I guarantee we will rue the day that we let them go to solve our current transportation problems with a Year old plan based on outdated assumptions. We need a Purple Line for today and we ask you to give us a better Purple Line.

- RECORD #256 DETAIL

First Name : Dan

Last Name : Malouff

Business Name : BeyondDC.com

Address : 4001 9th Street North #1707

City : Arlington

State : VA

Zip Code : 22203

Email Address : cirrus42@yahoo.com

Submission Content/Notes : 1. Rail rail rail! The Purple line MUST be light rail. Its advantages over BRT are too many to list in a quick email, but they are serious.

2. Use the original alignment, not Jones Bridge. The Jones Bridge alignment is worse for riders and worse for the Purple Line.

BUILD THE PURPLE LINE AS LIGHT RAIL ALONG THE
GEORGETOWN BRANCH RIGHT OF WAY!!!!

- RECORD #2335 DETAIL

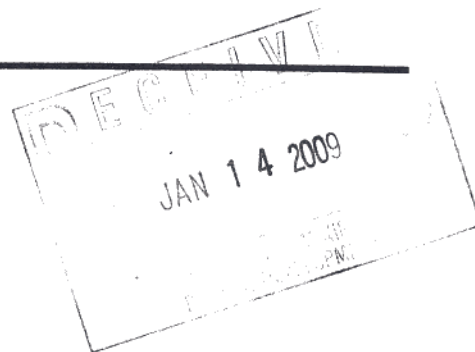
First Name : Fred
Last Name : Shaffer
Business Name : Bicycle and Trails Advisory Group
Address : c/o M-NCPPC Transportation Planning
City : Upper Marlboro
State : MD
Zip Code : 20772
Email Address :
Submission Content/Notes :
Attachments : Bicycle_and_Trail.pdf (186 kb)



Bicycle & Trail Advisory Group

Prince George's County ♦ Founded January 1998

January 12, 2009



Ms. Diane Ratcliff
Director
Office of Planning
Maryland Transit Administration
6 Saint Paul Street
Baltimore, Maryland 21202-1614

Re: Purple Line Alternatives Analysis

Dear Ms. Ratcliff:

At the January 9th, 2009 Quarterly Meeting of the Prince George's County Bicycle and Trails Advisory Group (BTAG), BTAG voted unanimously to endorse the proposed light rail options for the Purple Line. By providing an east-west transit link, the Purple Line will substantially improve the ability of area residents to commute, shop, and make other trips without the use of an automobile.

The Purple Line will provide unique opportunities for bicycling and walking in the corridor. The Purple Line will make bicycle commuting more feasible for many people by providing accessible transit stops within local communities and by providing transit access to more destinations within the region. Conversely, because parking may be constrained at the new light rail stops, bicycling and walking may account for a substantial portion of the total trips to each station. The light rail also has the potential to make bicycling and walking along existing streets safer by reducing the number of automobiles on some roadways and slowing traffic speeds in lanes that are shared with light rail.

BTAG recommends that the EIS be revised to evaluate the impacts on bicycling and walking east of Silver Spring at the same level of detail as the analysis between Silver Spring and Bethesda. It is likely that a similar analysis for the Prince George's County portion of the Purple Line will conclude that there will be additional environmental benefits through increased bicycling and walking as a result of the Purple Line. Also, additional sidewalk and bicycle facility needs may be identified through a more detailed analysis. The accommodation of bicycle and pedestrian trips should be considered throughout the entire Purple Line corridor as the planning and design process proceeds.

Mr. Michael Madden of MTA is tentatively scheduled to provide an overview of the project at the April 3rd quarterly meeting for BTAG. BTAG looks forward to working with MTA and local road agencies to ensure that the necessary pedestrian and bicycle connections are in place to provide a true multi-modal environment around the stops along the Purple Line.



c/o M-NCPPC Transportation Planning
14741 Governor Oden Bowie Drive, Upper Marlboro, MD 20772
301-952-3661 Fax: 301-952-3749 btag@mncppc.state.md.us



If you have any questions or would like to discuss this further, please contact me at (301) 952-3661 or fred.shaffer@ppd.mncppc.org. BTAG is the citizen advisory committee on trails related issues established by the Prince George's County Executive in 1998. It is chaired by members of the M-NCPPC Planning Department and facilitates interaction between trail and community groups with the various implementing agencies responsible for trails and bikeway improvements in the County.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Shaffer". The signature is stylized with a large initial "F" and a long, sweeping underline.

Fred Shaffer
M-NCPPC Trails Coordinator
Co-Chair, Bicycle and Trails Advisory
Group

- RECORD #1138 DETAIL

First Name :	William
Last Name :	Duvall
Business Name :	President of Board of Riviera
Address :	4242 East-West Highway
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State :	MD
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Email Address :	

Submission Content/Notes : The name is William, W-I-L-L-I-A-M, last name is Duvall, D-U-V-A-L-L. Good evening. My name is William Duvall and I'm President of the Board of Directors at the Riveria at Chevy Chase Condominiums.

On behalf of the Riveria, I thank you for this opportunity. Built in 1965, the Riveria is an 11-story, 168 unit condominium bordered on three sides by Montgomery Avenue, East/West Highway and the Capital Crescent Trail.

The right-of-way for the trail is on the order of just 10 feet from the foundation of our building.

With our density of population located immediately adjacent to the trail, we are uniquely and some would say perilously exposed to the noise, vibration and visual impact of the proposed line.

We understand the federal guidelines use of time weighted averages to assess the noise and vibration impacts of a project such as this.

It is unreasonable, however, to conclude that purple line disturbance would be most apparent to us during the weekday, evening and night hours of operation and all hours of operation on weekends.

We request the MTA's response to two key questions. First, what are the peak noise and vibration levels we would experience as frequently as every three minutes.

Second, we note that the LRT would expose the Riveria to ground born vibration of vibration decibels which exceeds the FTA standard.

Would the vibration decibels be damaging to our building, and what would be the human response or receptability to this level of vibration?

We cannot accept any risk of damage to our building or annoyance from ground born vibration.

There is a diversity of opinion among Riveria residents about the costs and benefits posed by the various purple line options, but we are in agreement that we must protect the structural integrity of our building and our quality of life.

To represent this diversity, I am here neither to oppose nor to promote the purple line, but request that the MTA engineering team in the event the state selects an option that runs on the trail apply all necessary and appropriate measures to reduce purple line disturbance to the Riveria.

Such as one, all noise and vibration reducing features of the selected transit vehicles, transit roadway or track bed. Two, the two-tiered trail above track level design known as the typical level of the trail right-of-way instead of placing the trail and track at the same level.

Three, placing any overhead electrical systems on the far south side of the track. Four, noise and vibration reducing walls or barriers. Five, non-intrusive lighting on the transitway and trail, and six, a pedestrian crossing behind our building if you must provide one, the presence of which in no way reduces the noise and vibration reducing features of the typical section mentioned in Item 2.

In conclusion, we appreciate and look forward to the MTA's continued consideration of the Riveria's unique vulnerability to purple line noise and vibration. Our concerns are valid, measurable, and your answers to the issues we have raised today are crucial to our understanding of any

effects upon our building structure, our perception of these annoyances and our quality of life.

On behalf of the 168 Riveria households, I thank you.

- RECORD #2266 DETAIL

First Name : William
Last Name : Duval
Business Name : President of Board of Riviera of Chevy Chase Condominium
Address :
City : Chevy Chase
State : MD
Zip Code :
Email Address :
Submission Content/Notes :
Attachments : Duvall_William.pdf (2 mb)

Good evening. My name is William Duvall and I'm President of the Board of Directors of the Riviera of Chevy Chase Condominium. On behalf of the Riviera, I thank you for this opportunity.

Built in 1965, the Riviera is an eleven story, one hundred sixty-eight-unit condominium bordered on three sides by Montgomery Avenue, East-West Highway, and the Capital Crescent Trail. The right of way for the Trail is on the order of just ten feet from the foundation of our building. With our density of population located immediately adjacent to the Trail, we are uniquely, and some would say perilously, exposed to the noise, vibration, and visual impact of the proposed Line.

We understand the Federal guidelines' use of time-weighted averages to assess the noise and vibration impacts of a project such as this. It is reasonable, however, to conclude that Purple Line disturbance would be most apparent to us during the weekday evening and night hours of operation, and all hours of operation on weekends. We request the MTA's response to two key questions. First, what are the peak noise and vibration levels we would experience, as frequently as every three minutes?

Second, we note that the LRT would expose the Riviera to Ground Borne Vibration of 73 vibration decibels, which exceeds the FTA standard. Would the vibration decibels be damaging to our building, and what would be the human response or perceptibility to this level of vibration? We cannot accept any risk of damage to our building or annoyance from ground borne vibration.

There is a diversity of opinion among Riviera residents about the costs and benefits posed by the various Purple Line options, but we are in agreement that we must protect the structural integrity of our building and our quality of life. To represent this

diversity, I am here neither to oppose nor to promote the Purple Line, but to request that the MTA engineering team, in the event the State selects an option that runs on the Trail, apply all necessary and appropriate measures to reduce Purple Line disturbance to the Riviera, such as:

1. All noise- and vibration-reducing features of the selected transit vehicles, transit roadway or track bed.
2. The two tiered, Trail-above-track-level design known as the typical section of the Trail right-of-way, instead of placing the Trail and track at the same level.
3. Placing any overhead electrical systems on the far, south side of the track.
4. Noise- and vibration-reducing walls or barriers.
5. Non-intrusive lighting on the transit-way and trail, and
6. A pedestrian crossing behind our building, if you must provide one, the presence of which in no way reduces the noise- and vibration-reducing features of the typical section mentioned in Item 2 above.

In conclusion, we appreciate and look forward to the MTA's continued consideration of the Riviera's unique vulnerability to Purple Line noise and vibration. Our concerns are valid, measurable, and your answers to the issues we have raised today are crucial to our understanding of any effects upon our building's structure, our perception of these annoyances, and our quality of life. On behalf of the one hundred sixty-eight Riviera households, I thank you.

- RECORD #1202 DETAIL

First Name :	Teena
Last Name :	Green
Business Name :	Branch Ave Focus Group
Address :	6011 Darel Street
City :	Camp Springs
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Yes. My name is Teena Green, T-E-E-N-A, Green, G-R-E-E-N with no E on the end. 6011 Darel Street in Camp Springs, Maryland.

I chair the Branch Avenue Focus Group which is a Smart Growth review group within Prince George's County. I also serve on the Governor's Task Force for the Future of Maryland, so I'm accustomed to looking at transportation and development and other issues for the State throughout the year 2030.

I would like to speak today on behalf of the Branch Avenue Focus Group and in particular, I guess, in the areas of the Purple Line that are not there and that would be areas going down to the Blue Line, the end of the Green Line. I personally live at the end of the Green Line and down to National Harbor.

We see this as critical for the movement in and about the county and in and about the region. I think when we look at this area we have to understand that it's not just our area it's the National Capital Area.

We are expecting and do receive millions of visitors to the Stadium, to the Stadium there in Landover, and to National Harbor. I think from a transportation standpoint, we do need to look at being able to supply transportation needs in that area.

If you live down in this area, you know that on the day that they have a game you try to leave work early. Okay. And you also know that big events, whether they're on the Virginia side of the Potomac River or on our side, it can be challenging getting back and forth across the Woodrow Wilson Bridge.

So we would ask, that if in any measure, that the Purple Line could accommodate FedEx Field, that would be ideal. If it could go down as far as the Green Line and I think when you look at the Green Line, I can use myself as an example, I live in Camp Springs, Maryland, right there at the Branch Avenue.

So I can walk to the station and I'm fortunate enough to be able to work in Prince George's County as well. I work over in New Carrollton at the Internal Revenue Service.

Metro is not available to me because I don't have an hour and a half to spend going all the way downtown and then turning around and coming all the way back to New Carrollton. So I think we need to look at how we complement the system.

Also when we look at the folks who will be using the lower stations, like at Branch Avenue, like at Addison Road and Pennsylvania Avenue and Suitland Road, these people are coming from other counties. The majority of the people who use the Branch Avenue Metro Station come from Charles County, and they come from St. Mary's County and I think that we need to continually factor that in.

So that is just our request that if there is any opportunity for expanding that or if you're taking priority on where you expand next, we would ask that you look at those areas south of New Carrollton. Especially those areas like Branch Avenue and Pennsylvania Avenue that feed in to the Southern Maryland counties. Thank you.

- RECORD #1271 DETAIL

First Name : Nestor
Last Name : Alvarenga
Business Name : CASA
Address : 734 University Boulevard
City : Silver Spring
State : MD
Zip Code : 20910
Email Address :

Submission Content/Notes : Good afternoon. My name is Nestor Alvarenga and I work for CASA of Maryland, or CASA of Maryland as well. I'm a community organizer and a tenant organizer.

We want to say that we are in favor of the development of the community, especially for Langley Park. As we know, it is a low income and immigrant community for both Prince George's County and Montgomery County.

We are aware of the positive impact, as Lindsay said, it will have in Langley Park, such as social and economic benefits, but at the same time we are also concerned in massive displacement that could occur from all of this development as well as affordable housing.

We want affordable housing for our tenants and we want them to stay in Langley Park because this is the only community they know. So we want them to be active members of the community as well and enjoy. It's a win/win situation for everybody. That's what we want. Thank you. Thank you for your time.

- RECORD #1146 DETAIL

First Name :	Guy
Last Name :	Johnson
Business Name :	Casa de Maryland
Address :	734 Unviersity Blvd. E
City :	Silver Spring
State :	MD
Zip Code :	20903
Email Address :	

Submission Content/Notes : Guy Johnson. That's G- U-Y, J-O-H-N-S-O-N. I'm a Staff Attorney for Casa de Maryland, Inc. I'm testifying for the organization and also on my own behalf.

Casa is a non-profit organization with offices in Silver Spring, Langley Park, Wheaton, Rockville, and also Baltimore. So locations all along the proposed purple line.

We serve the immigrant community and provide legal and social service assistance to day laborers, low income tenants and domestic workers, among others.

We as an organization support the light rail build out of the purple line for three main reasons. One, for the job creation and economic development that will result from the purple line construction.

We also should make certain that these jobs go to local area residents.

Two, for the reduced commuting times for domestic workers and laborers who are either currently commuting anywhere between New Carrollton and Bethesda for jobs or whose employment prospects would be significantly improved by increased access to public transportation.

Three, for the economic and social lift that improved public transit would give to immigrant drivers who remain locked in expensive battles with the MVA bureaucracy, auto traffic congestion and the high cost of car ownership.

We are concerned about the palpable threat of low income tenants, (inaudible) however that is likely to occur without the passage of significant protective legislation by state and county authorities in the wake of the purple line's approval.

As a threshold matter, we would counter that future environment impact studies either contain a more thorough analysis of the economic and social impacts of this type of development, specifically with regard to low income residents and those populations who for various reasons are vulnerable to market fluctuations.

Ultimately we would counsel the development of the separate community impact report charged with an in depth analysis of these related issues. These reports would include one, an employment assessment evaluating the number and type and accessibility of jobs to be created at the project.

Two, an affordable housing assessment looking at the affordability of the house created or lost due to the project. Three, a neighborhood needs assessment determining the project's retail benefits and the service needs facing the affected neighborhood, such as the need for child care and access to health services.

We believe the light rail will hold many benefits for our community. It will also raise property values and residential and commercial rents.

While we support the development of mixed income communities in the Langley Park and Flower Branch neighborhoods and we welcome the increased access to employment and services that light rail transit will bring, we also wish to reiterate that these benefits should accrue to longstanding members of these communities and that development should not come at the expense of low income, fixed income and immigrant populations along the purple line route. Thank you.

- RECORD #3033 DETAIL

First Name : Laura A.

Last Name : Pinto

Business Name :

Address : 1028 University Blvd., #932

City : Silver Spring

State : MD

Zip Code : 20903

Email Address :

Submission Content/Notes : Translated:

We are in favor of the purple line but are concerned about the increase in the costs of residential and commercial properties.

Attachments : Comment Cards. Casa de Maryland.pdf (422 kb)



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Wilfredo Cardona Organization: _____
Address: 3112 Leeward Hallsville, MD
City: Maryland State: _____ Zip Code: 20783

If we wish to submit the following comments on this project:

Sobre la línea morada
nos beneficia mucho
ya que nos podemos
transfear de un lado
A otro el proyecto es
muy importante en
mi forma de pensar



Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

Name: Santos Gregorio Organization: _____

Address: Nicholson st Riverdale

City: ~~MO~~ Rivdale State: MD Zip Code: _____

I/We wish to submit the following comments on this project: Yo pienso que es bueno

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins or other markings visible.



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Carlos Lopez G. Organization: _____

Address: 1018 terrace kebec

City: MD State: MD Zip Code: 20903

I/We wish to submit the following comments on this project: _____

Linea Morada lo necesitamos
para tener mas fluides a siq
nuestros trabajos y conocer
mas alla de donde vivimos.



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

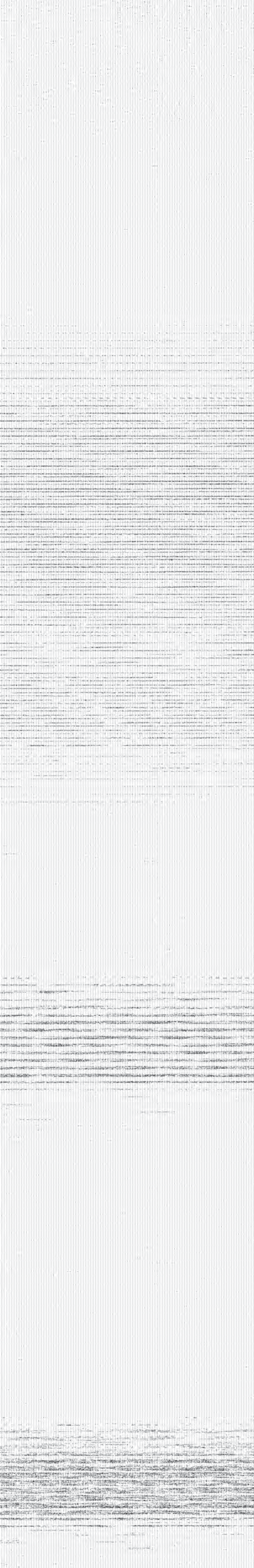
PLEASE PRINT

Name: Miguel de León Organization: _____

Address: 1432 K St. Apt 201.

City: Hyattsville. State: M.D Zip Code: 20783.

I/We wish to submit the following comments on this project: Por ES. muy
necesario. Para poder nos transportar.
mas. rapido por favor





Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Alvaro Colindres Organization: _____

Address: 8111 17th Pl

City: Hyattsville State: MD Zip Code: 20783

I/We wish to submit the following comments on this project: _____

para tener mejor acceso de
salida y puede beneficiar
a muchos



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Santos A Aguila Organization: _____

Address: 1024 University Landing #522

City: Silver Spring State: M.D. Zip Code: 20903

I/We wish to submit the following comments on this project: _____

Estoy de acuerdo en el desarrollo
pero quiero siempre vivir aca y que
tenjamos la oportunidad de Trabajar
para poder seguir dando lo que necesitan
nuestros niños y mas seguridad a
este lugar de landlipar ya que tenemos
15 años viviendo aca en university
landin



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Teneza Campos Organization: _____

Address: 8104 Tahoma Dr. # 110

City: Silver Spring State: MD Zip Code: 20903

I/We wish to submit the following comments on this project: _____

buena mi comentario es que no estoy
de acuerdo con la linea morada por la
razon de que nos va a perjudicar con
la vivienda nosotros rentamos y somos
personas de bajos recursos los mas
perjudicados somos pobres por favor
tomen en cuenta nuestras necesidades
gracias



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Lucia Hernandez Organization: _____

Address: 8104 Taltona Dr. #131

City: Silver Spring State: MD Zip Code: 20903

I/We wish to submit the following comments on this project: _____

Mi comentario es que estamos
de acuerdo con la línea morada. pero
también estoy preocupada como inquilina
es costo de la renta de Apartamentos.
y la renta de pequeños negocios



Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

Name: José Cruz Organization: _____
Address: 8112 Tattona DR # 521
City: Silver Spring State: MD Zip Code: 20903

I/We wish to submit the following comments on this project: _____

estamos preocupados por el costo de la vivienda y los negocios pequeños. que el aumento de Renta y negocios



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: LAURA A. PINTO Organization: _____

Address: 1028 UNIVERSITY BL #932

City: SILVER SPRING State: MD Zip Code: 20903

I/We wish to submit the following comments on this project: _____

yo estoy de acuerdo con la linea morada.
pero estoy preocupada por el costo de la
vivienda y los pequeños negocios



Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

Name: Pedro A Henriquez Organization: _____

Address: 8114 AP #3 1st St.

City: HYATTVILLE State: MO Zip Code: 20783

I/We wish to submit the following comments on this project: Sigurdson

Una línea cercana a nuestra
comunidad por mucho latinos

- RECORD #23 DETAIL

First Name :	Kevin
Last Name :	Becker
Business Name :	Chatham Council Civic Association
Address :	3400 Chatham Road
City :	Adelphi
State :	MD
Zip Code :	20783
Email Address :	beckerkp@gmail.com
Submission Content/Notes :	We would like to be included in any notifications you send out. We represent the 3300 & 3400 blks of University Blvd East, The 7800 Blk of Temple Street & the 33 & 3400 blks of Chatham Road

- RECORD #3288 DETAIL

First Name : Kevin
Last Name : Becker
Business Name : Chatham Council Civic Association
Address : 3400 Chatham Road
City : Adelphi
State : MD
Zip Code : 20783
Email Address : chathamcouncil@gmail.com
Submission Content/Notes : I have registered twice before online, and once at a meeting. Our association takes in the 3300, 3400, blks of University Blvd. e., 7800 blk of Temple Street, 3300, 3400 blks Of Chatham Road, 7800 blk adelphi court, & 3300 &3400 blks of Cool Spring road.

- RECORD #26 DETAIL

First Name : Kevin
Last Name : Becker
Business Name : Chatham Council Civic Association
Address : 3400 Chatham Road
City : Adelphi
State : MD
Zip Code : 20783
Email Address : beckerkp@gmail.com
Submission Content/Notes : A few weeks ago I registered our Civic Association for the third time. The first two times at public meetings a year ago. For some reason we are still not receiving any mailings or other communications from you.

- RECORD #1141 DETAIL

First Name : Alan
Last Name : Girard
Business Name : Chesapeake Bay Foundation
Address : 212 West Main Street, Suite 204 B
City : Salisbury
State : MD
Zip Code : 21801
Email Address :

Submission Content/Notes : My name is Alan Girard, A-L-A-N, G-I-R-A-R-D. 6 Herndon Avenue, Annapolis, Maryland representing the Chesapeake Bay Foundation.

We have over 100,000 members in Maryland and I'm here to represent their interest tonight. CBS has been engaged in land use and transportation issues for over 18 years.

Since 2000 we have been a strong advocate for the purple line. No information we have seen to date has caused us to change that position.

Concerning the draft EIS, we agree the adverse impacts that are anticipated will be modest since the purple line will be built on an existing roadway and right-of-way is purchased specifically for the purpose of building the purple line, encroachment will be minimal. So parkland, wildlife habitat and open space.

While some individual and narrow bands of trees may be impacted, forest area impacts will be minimal. We note that 1.4 acres of wetlands may be impacted and that this is modest for a project of this size.

Finally we note the extent direct and indirect impacts that will not occur as a result of an additional 60 to 68,000 transit trips per day with about 1/3 of those as new transit trips will occur if the purple line is built.

We believe the impacts of new roads and highway widenings required to serve citizens if the purple line is not built will be far more adverse than those mentioned above.

We urge you to finalize this draft EIS and allow the purple line to move forward. Thank you.

- RECORD #1481 DETAIL

First Name :	Alison Hooper
Last Name :	Prost
Business Name :	Chesapeake Bay Foundation
Address :	6 Herndon Avenue
City :	Annapolis
State :	MD
Zip Code :	21403
Email Address :	APROST@CBF.ORG
Submission Content/Notes :	Attached please find written comments from the Chesapeake Bay Foundation on the Purple Line AA/DEIS. These track our oral testimony given at the public hearing. Please let me know if you have any problems opening or reviewing that attachment. Thank you. Alison Hooper Prost Maryland Office Attorney Chesapeake Bay Foundation 6 Herndon Avenue Annapolis, Maryland 21403 (410) 268-8816 www.cbf.org
Attachments :	Microsoft Word - Purple Line Testimony.chspkl bay fndtn.pdf (127 kb) Chesapeake Bay Foundation.pdf (1 mb)



CHESAPEAKE BAY FOUNDATION
Saving a National Treasure

**Testimony by the Chesapeake Bay Foundation
Concerning the Purple Line Transit-way
Alternatives Analysis/Draft Environmental Impact Statement**

Alan Girard, Jr.
Lands Program Manager
Maryland Office
Chesapeake Bay Foundation

November 18, 2008

Good evening. My name is Alan Girard and I manage land-related matters in the Maryland Office of the Chesapeake Bay Foundation ("CBF"). Thank you for the opportunity to present the testimony of the Foundation on this important matter. Please note that CBF currently has nearly 100,000 members in Maryland.

CBF has been actively involved in land use and transportation matters in suburban Maryland for more than 18 years. We have been deeply engaged in transportation planning and analysis at both the regional level, at the Metropolitan Washington Transportation Planning Board, and at the local level, with respect to a wide variety of particular infrastructure projects and land use issues. Since about 2000, we have been a strong advocate for the Inner Purple Line light rail transit system.

Let me say at the outset that nothing in the information we have seen to date would cause us to change that position. Overall, we believe that a Purple Line system can have very positive effects on circumferential travel, improved mobility, and access for many thousands of citizens; heightened prospects for improving surrounding communities and related growth and economic development (the latter in places where it is already planned and long-sought); and a positive impact on the environment in general. While any such system -- being inserted into areas that are already largely developed -- will present change and challenge to those communities through which it travels, and some environmental impacts, by and large we agree with the findings of the DEIS that adverse change will be modest, and ultimately the project will be constructive and affirming.

Since the Inner Purple Line route would mostly be executed on existing roadways and on existing ROW that was purchased specifically for such purposes, encroachment will be minimal into parkland, open space or wildlife habitat areas; most of the open space impacts will occur on the University campus. While individual trees and narrow bands of trees along the route may be adversely impacted (mostly in the ROW of the Georgetown Branch), forested area impacts will be minimal overall.

According to the DEIS, surface and groundwater impacts are also predicted to be minimal. Up to 1.4 acres of some wetlands impacts are possible (mostly due to bridging,) but such impacts are modest with a project of this scale, and can be mitigated. About a mile of in-line stream and 13-15 acres of floodplain impacts (mostly due to minor fills from additional road/transit-way support) are also possible. The project would need to assiduously protect against erosion with construction on certain soils that occur across the area. Air quality impacts are likely to be positive, with some reduction of automobile-based mobile source pollutants and greenhouse gas emissions over time.

Finally, as to the travel efficiencies and transportation advantages of moving forward with this transit-way, allow me to note that the light rail alternative is expected to accommodate from 60,000-68,000 trips per day, with about one third of them new transit trips – that is, people getting out of their cars. If the state were to follow the “no build” alternative, average travel time across the area could be as high as 81 minutes within twenty years; transit provides from a 25 to 40 minute advantage, depending upon mode.

It is our view that we must begin, finally, to knit together our urban areas not solely with new major highways or extensively widened roadways on which travel ever-more cars, trucks and buses. That kind of transportation system will continue to exact a heavy toll, through a variety of extensive direct and indirect adverse impacts on community and environment. Rather, it is time to connect our communities and our neighborhoods with modern, efficient transit.

Bus Rapid Transit may have some advantages as to “flexibility,” but through-put capacity is nowhere near that which could be provided by light rail, and only the light rail option provides the certainty necessary to appropriately boost and sustain business interests, smart growth, and economic development in the corridor. The beginning of a circumferential transit line that connects the spokes of the Metro subway system and, more importantly, that links our highly urbanized communities inside the Beltway – the Purple Line -- is both necessary and timely. We commend its moving forward.



CHESAPEAKE BAY FOUNDATION
Saving a National Treasure

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Alan Girard, Jr.
Lands Program Manager
Maryland Office
Chesapeake Bay Foundation

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- RECORD #3121 DETAIL

First Name :	Shawn
Last Name :	Woodyard
Business Name :	President, Chevy Chase Hamlet Homeowner's Association
Address :	7712 Curtis Street
City :	Chevy Chase
State :	MD
Zip Code :	20815
Email Address :	swoodyard@verizon.net
Submission Content/Notes :	
Attachments :	Woodyard 35541.pdf (220 kb)

☐ GEN - 148324 in Respond - M, Shawn Woodyard

Help

(ASSIGNED to: Kelly Bell)

7712 Curtis St, Chevy Chase, MD 20815-4914 (H)

301-657-5964 (H) (Primary), swoodyard@verizon.net (Primary),

Actions

History

☐ Search this Record

Sort by

Profile Correspondence -> Respond

☐ Profile Correspondence - Started 01/13/2009 02:58 PM - Completed 01/13/2009 02:58 PM by Brenda Martin

Kelly Bell 01/13/2009 03:03 PM Added Mail 2002374 for M, Shawn Woodyard (pending) US Post
 17200904058.html

Brenda Martin 01/13/2009 02:58 PM This Step was Completed on 1/13/2009 2:58 PM by Brenda Martin
 User(s): Kelly Bell.

Brenda Martin 01/13/2009 02:58 PM Added Code(s): 'MDOT - Maryland Department of Transportation'

Brenda Martin 01/13/2009 02:58 PM Attachment E-Mail Message 2009-01-07 12-41AM.html from
 Message 2009-01-07 12-41AM.html

☐ Respond - Started 01/13/2009 02:58 PM - Due 02/02/2009 02:58 PM

Kelly Bell 01/22/2009 10:50 AM Acquired Ownership.



From: Shawn Woodyard

Sent: Wednesday, January 07, 2009 12:40:58 AM

To: MCP-Chairman@mncppc-mc.org

CC: Governor; Lt Gov; Ike.Leggett@montgomerycountymd.gov; ocemail@montgomerycountymd.gov; councilmember.knapp@montgomerycountymd.gov; NNMCEIS@med.navy.mil; MCP-Chairman@mncppc-mc.org; joan.kleinman@mail.house.gov; richard.madaleno@senate.state.md.us; mmadden@mtamaryland.com; phil.alperson@montgomerycountymd.gov; ozah@montgomerycountymd.gov; county.council@montgomerycountymd.gov; marylandgov@dbm.state.md.us; councilmember.berliner@montgomerycountymd.gov; pbrow@verizon.net; 'Melissa A Barbor'

Subject: Purple Line Extension's Citizen Testimony: Request for explanation of the Board's Deliberation Process

Dear Montgomery County Planning Board...

I am Shawn Woodyard, the president of the Chevy Chase Hamlet Homeowners Association. Our homeowners live off of the Southside of the Capital Crescent Trail, the eastside of Connecticut Avenue and on either side of East-West Highway between Connecticut and Jones Bridge Road.

However, I am writing to you not as the president of the Hamlet Association but as a user of the Capital Crescent Trail. I am writing to you to advocate saving the trail as it is a valuable piece of natural open space that is close and accessible to our community. I am also writing to you to request an explanation of how the lost of such a valuable resource will be mitigated if the current trail must be altered, rendered in accessible for a time or replaced? I am writing to ask how the planning board would plan to compensate for the lost of this natural open space for the community and people like me.

As the Montgomery County Planning Board I am assuming that your organization has considered the importance of retaining recreation outlets close to citizen's homes. As our population of people continue to have health problems from our increasingly sedentary and workaholic lives, I am assuming that your organization would have considered how it plans to compensate for the potential lost of an attractive and inviting natural open space that encourages thousands of people to use and exercise on the trail every week in the little free time they have outside of work.

I am also hoping that your organization's plans do not include requiring these thousands of people to begin driving to some far off alternative open space up county or in the district. I am assuming that your organization will understand the negative impact of such an approach on the citizenry, county and the environment. As I am sure that the Montgomery County Planning Board's deliberations will consider that such an approach would create a number of indirect impacts that the planning board would need to address.

Such as...

1. ...The likelihood that more people in this area will "not exercise" at any alternative location if that location requires entering a vehicle to get there (i.e. car, bus or train). I am assuming that your organization can articulate its plan to address these impacts if the purple line replaces the natural open space of the current trail.
 - a. What health impacts? I am assuming that your organization's deliberation process addresses the likelihood that the people of this community will no longer have the encouraging natural space of the trail to beckon them out of doors and thus some amount of these people will be increasingly more likely to encounter greater healthcare costs in the future due to inactivity and weight gain. Therefore I am asking your organization to articulate its plan for addressing this issue and to explain how its plans will avoid incurring the potential increased healthcare costs of an increased inactive population. Healthcare costs that would impact the county's budget and therefore the citizen's tax bill in a very negative economy.
 - b. What environmental impacts? I am assuming that your organization's deliberation process addresses the likelihood of an negative impact to the environment as one group of people is taken off the roads (i.e. the daily commuter between Silver Spring and Bethesda) while another group of people is placed back on the road (i.e. the exerciser that now could have to commute to exercise).

Please be assured that I personally believe in mass transit and I believe in community development however I also believe that communities should ensure that development takes every opportunity to increase the quality of life for its citizens rather than decrease it. Also please know that I am confident that your organization would share this goal. Thus I believe that the citizenry charges its county, state and federal organization with the responsibility to weight these issues and develop a plan to address these concerns. Therefore, I am asking for the Montgomery County Planning Board to articulate its plan to address these concerns and to explain how it deliberated to develop its approach to achieve these goals. I would ask that such an articulation addresses the county's long term plan for how much natural open space should be close to the average citizen and/or neighborhood. (i.e. I am not discussing how much open space in the county but rather how much open space does the county plan expects to be generally excisable within the immediate surroundings of a homeowner?)

Please note that I am asking these questions as a homeowner that uses the trail from its MD starting point at the Silver Spring industrial park to the River Road foot bridge and on into the District. I, and my family, walk, jog and bike on this trail two and sometimes three times a week. We have been using this trail for the last 17 years in this area which includes the last 5+ years in my current residence. I am asking these questions as a 45+ year old African-American man that works the normal 50-60+hours a week that also has asthma and that has been advised by my doctor of the importance of exercise to control that illness and my weight as I get older. Therefore I am asking these questions as one of thousands of people within our community that will greatly benefit from understanding the board's plan for ensuring that such a valuable outlet remains available to us in the future.

May I thank you in advance for talking the time to advise me of the board's answers to these very important questions.

Sincerely,

Shawn Woodyard
President - Homeowner
Chevy Chase Hamlet Homeowner's Association
7712 Curtis Street
Chevy Chase, MD 20815
301-657-5964

- RECORD #1466 DETAIL

First Name : Mike
Last Name : Marsh
Business Name : President, Chevy Chase Hills
Address : 3904 Manor Road
City : Chevy Chase
State : MD
Zip Code : 20816
Email Address :

Submission Content/Notes : Okay, Michael Marsh. M-A-R-S-H. At 3904 Manor Road in Chevy Chase, Maryland. I am the volunteer president of the Chevy Chase Hills Civic Association and I'm here as an individual, although representing my neighborhood, I believe, we're about 60 percent against, 40 percent for the Purple Line.

I personally am for mass transit. Don't think this is thought out well, don't think that the MTA advisory board is reporting the comments of citizens properly. I've yet to see any comment that I have given on the advisory board regarding the affect that it will have on wildlife, on animals, on birds, trees have been the only thing that's been mentioned.

There is a lack of green space in the area. I moved down here from Princeton, New Jersey, that's the only green space that's available and I'd hate to lose it. So, in the sense of the environment and the sense of the recreational green space area, I'd like to vote against the Purple Line rail that is, however, I'm all for the Purple Line bus route. And I think that that's an important thing to do.

I also think it's important to synchronize the lights on Connecticut Avenue. I commute back and forth from Chevy Chase to D.C. every day, the lights are never synchronized properly, which is a waste of gasoline and its wear and tear on my car.

Second thing would be, it would be nice to have a bus route that would go from the beltway and/or from Jones Bridge Road all the way into the city and not stop and have to reconnect on buses. I think that would save time and space as well. I had an option to live in Silver Spring or further out, I opted to live in Chevy Chase area just so that I would be able to walk to the Metro stop, which is about a 10 minute walk from my house.

I think that other people had the same opportunity to destroy trees, green space, wildlife, recreation for the, for a few people, for a couple hundred people I don't think is personally worth the effort for this.

Second thing is, if there is a light rail put on the Georgetown Crescent Trail, I think that the Maryland Transit Association should build a park on Connecticut Avenue off of the trail on the Galaxy cleaner section of the area. That would be on the Columbia Culture section for the neighbors that would then lose the green space, that would be the least that they could do. Thank you very much.

- RECORD #321 DETAIL

First Name :	Theresa
Last Name :	Lukas
Business Name :	Chevy Chase West Neighborhood Association
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	TERRI.LUKAS@GMAIL.COM

Submission Content/Notes : Please enter this comment in the file for the Subject AA/DEIS. Please acknowledge receipt.

Terri Lukas
On behalf of Chevy Chase West Neighborhood Association

November 18, 2008
Chevy Chase Neighborhood Association
Chevy Chase MD 20815

Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th fl.
Baltimore, MD 21202

Dear Ms. Ratcliff/Hearing Officer:

I am writing this letter on behalf of Chevy Chase West Neighborhood Association (CCWNA), representing an unincorporated neighborhood of more than 400 households (bordering Bethesda on the north, Somerset on the south Wisconsin Ave. on the east and Little Falls Parkway on the west).

On behalf of CCWNA members who use mass transit regularly, I am urging the MTA to choose the Purple Line option that is the most efficient in terms of travel times, the least expensive in terms of fares, and the most environmentally sensitive in terms of impact on air quality and noise levels. CCWNA also speaks for taxpayers and from their perspective, urges the MTA to choose a Purple Line option that costs the least to build and maintain, is the most efficient in terms of attracting people to use it instead of cars, and preserves and protects the quality of our environment. If these factors are taken into account, CCWNA is sure that the MTA will reject any Purple Line option that involves putting light rail or rapid bus transit on the Georgetown Branch of the Capital Crescent Trail.

CCWNA supports the community coalition of neighborhoods that calls itself "Rethinking the Purple Line". This coalition agrees with the independent reviews of MTA's "Purple Line Alternatives Analysis/Draft Environmental Impact Statement" (AA/DEIS) that find MTA's analyses to be deficient on all the important factors that should be determining the alternative of choice for the Purple Line. Living as we do in a crowded metropolitan area, we want a Purple Line to be built. But it is a false choice that MTA is presenting to citizens, i.e., between having a desirable Purple Line and a protected Georgetown Branch Trail. We can and should have both, and the fact that our elected and appointed public officials are trying to convince us of the reverse is a betrayal of public trust in the governance of the County and State.

Bus Rapid Transit (BRT) with dedicated lanes that connects directly to the expanding NIH campus from Silver Spring using existing roads, is the least costly Purple Line option to build, maintain and use and will carry the greatest number of riders. It also promises to be a clean option because the County is replacing its bus fleet that runs on diesel fuel with one that uses natural gas. It will avoid clear cutting 15 acres of mature trees that protect our streams, our air and our quality of life.

Critically, BRT on existing roads avoids confiscating the Georgetown Branch of the Capital Crescent Trail that is used by thousands of citizens and visitors every year and has been growing in popularity ever since it was opened. Cities all over the U.S. have spent tax dollars trying to

build and maintain trails such as the Capital Crescent. It is shocking and disgraceful to think that our public officials are working in the opposite direction: to take a beautiful and popular trail away from users even in the face of our widespread opposition.

November 18, 2008 (cont'd.)
CCWNA

CCWNA urges MTA and its elected local and state officials to rethink its previous assumptions about Purple Line options and respect what people are telling them about the importance of preserving the Capital Crescent Trail in its present form. If this happens, we are sure that a Purple Line option will be selected that will serve our collective transportation needs well into the 21st century.

Sincerely yours,

Terri Lukas
4703 Morgan Drive
Chevy Chase, MD 20815

cc:

- Co-Presidents CCWNA, Sue Andersen and Melanie Folstad

- Governor Martin O'Malley
 - o Governor@gov.state.md.us
 - o 100 State Circle, Annapolis, MD 21401

- Montgomery County Council Executive Ike Leggett
 - o ocermail@montgomerycountymd.gov
 - o 101 Monroe St., 2nd fl., Rockville, MD 20850

- County Council President Michael Knapp
 - o County.council@montgomerycountymd.gov
 - o 100 Maryland Ave., Rockville, MD 20850

- County Council Delegate, District 1: Roger Berliner
 - o County.council@montgomerycountymd.gov
 - o 100 Maryland Ave., Rockville, MD 20850

- U.S. Representative (8th District): Chris Van Hollen
 - o Joan.Kleinman@mail.house.gov
 - o 51 Monroe St., Suite 507, Rockville, MD 20850
- Planning Board Chairman Royce Hanson
 - o MCP-Chairman@mncppc-mc.org
 - o Planning Board, M-NCPPC, 8787 Georgia Ave., Silver Spring, MD 20910

- State Delegate District 16: Brian Frosh
 - o Brian-frosh@senate.state.md.us
 - o Miller Senate Office Bldg., Annapolis, MD 21401

Attachments :

CCWNA.pdf (27 kb)

November 18, 2008
Chevy Chase Neighborhood Association
Chevy Chase MD 20815

Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th fl.
Baltimore, MD 21202

Dear Ms. Ratcliff/Hearing Officer:

I am writing this letter on behalf of Chevy Chase West Neighborhood Association (CCWNA), representing an unincorporated neighborhood of more than 400 households (bordering Bethesda on the north, Somerset on the south Wisconsin Ave. on the east and Little Falls Parkway on the west).

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CCWNA supports the community coalition of neighborhoods that calls itself "Rethinking the Purple Line". This coalition agrees with the independent reviews of MTA's "Purple Line Alternatives Analysis/Draft Environmental Impact Statement" (AA/DEIS) that find MTA's analyses to be deficient on all the important factors that should be determining the alternative of choice for the Purple Line. Living as we do in a crowded metropolitan area, we want a Purple Line to be built. But it is a false choice that MTA is presenting to citizens, i.e., between having a desirable Purple Line and a protected Georgetown Branch Trail. We can and should have both, and the fact that our elected and appointed public officials are trying to convince us of the reverse is a betrayal of public trust in the governance of the County and State.

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November 18, 2008 (cont'd.)
CCWNA

CCWNA urges MTA and its elected local and state officials to rethink its previous assumptions about Purple Line options and respect what people are telling them about the importance of preserving the Capital Crescent Trail in its present form. If this happens, we are sure that a Purple Line option will be selected that will serve our collective transportation needs well into the 21st century.

Sincerely yours,

Terri Lukas
4703 Morgan Drive
Chevy Chase, MD 20815

cc:

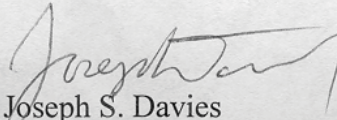
- Co-Presidents CCWNA, Sue Andersen and Melanie Folstad
- Governor Martin O'Malley
 - Governor@gov.state.md.us
 - 100 State Circle, Annapolis, MD 21401
- Montgomery County Council Executive Ike Leggett
 - ocemail@montgomerycountymd.gov
 - 101 Monroe St., 2nd fl., Rockville, MD 20850
- County Council President Michael Knapp
 - County.council@montgomerycountymd.gov
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- County Council Delegate, District 1: Roger Berliner
 - County.council@montgomerycountymd.gov
 - 100 Maryland Ave., Rockville, MD 2050
- U.S. Representative (8th District): Chris Van Hollen
 - Joan.Kleinman@mail.house.gov
 - 51 Monroe St., Suite 507, Rockville, MD 20850
- Planning Board Chairman Royce Hanson
 - MCP-Chairman@mncppc-mc.org
 - Planning Board, M-NCPPC, 8787 Georgia Ave., Silver Spring, MD 20910
- State Delegate District 16: Brian Frosh
 - Brian-frosh@senate.state.md.us
 - Miller Senate Office Bldg., Annapolis, MD 21401

- RECORD #2222 DETAIL

First Name : Joseph
Last Name : Davies
Business Name : Citizens Against Beltway Expansion
Address :
City :
State : MD
Zip Code :
Email Address :
Submission Content/Notes :
Attachments : Wrtn Tstmny. J.Davies. Ctzns Agnst Bltwy Expnsn.pdf (1 mb)

STATEMENT FOR CITIZENS AGAINST BELTWAY EXPANSION

I am here on behalf of Citizens Against Beltway Expansion, an organization of citizens and citizens' organizations located around the Beltway in Montgomery County opposed to the expansion of the current Beltway by the addition of toll lanes or otherwise. As part of our position, we support public transportation and smart growth as better alternatives to highway expansion. In this regard we support construction of the Purple Line. We believe that by fostering public transportation, the Purple Line is a major step in the right direction and a better alternative to the expenditure of public money on highway expansion, which has failed to solve the problem of highway congestion. We also believe that the Purple Line is a far better option to tolls roads on the Beltway, which will be affordable only the well off, since the Purple Line will support transportation across the spectrum of society. In our view a light rail option is the best alternative for the Purple Line since it would be more efficient and economical over the long run. Our position is more fully elaborated on our website at: www.nobeltwayexpansion.org. Thank you.



Joseph S. Davies

For: Citizens Against Beltway Expansion

- RECORD #1428 DETAIL

First Name : Joseph
Last Name : Davies
Business Name : Citizens Against Beltway Expansion
Address : 4808 Broad Brook Dr.
City : Bethesda
State : MD
Zip Code : 20814
Email Address :

Submission Content/Notes : My name is Joseph Davies, J-O-S-E-P-H, D-A-V-I-E-S. I'm here on behalf of Citizens Against Beltway Expansion, an organization of citizens and citizens associations located around the beltway in Montgomery County, opposed to the expansion of the current beltway by the addition of toll lanes or otherwise.

As part of our position, we support public transportation and Smart Growth as better alternatives to highway expansion. In this regard, we support the construction of the Purple Line. We believe that by fostering public transportation, the Purple Line is a major step in the right direction and a better alternative to expenditure public money on highway expansion, which has failed to solve the problem of congestion.

We also believe that the Purple Line is a far better option to toll roads on the beltway, which will be affordable only by the well off, since the Purple Line will support transportation across the spectrum of our society.

In our view, a light rail option is the best alternative for the Purple Line since it would be more efficient and economical over the long run. Our position is more fully elaborated at our website at www.nobeltwayexpansion.org. Thank you.

- RECORD #2520 DETAIL

First Name :	Ron
Last Name :	Tripp
Business Name :	The Citizens Coordinating Committee on Friendship Heights
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	RTRIPP@EROLS.COM
Submission Content/Notes :	<p>Dear Chairman Hanson;</p> <p>Please accept the attached testimony on behalf of The Citizens Coordinating Committee on Friendship Heights. This testimony was delivered at one of the State's public hearings on November 18th, and we ask that you accept it for the record as CCCFH's testimony in the Planning Board's hearing on Thursday.</p>
Attachments :	CCCFH Purple LineTestimony.pdf (22 kb)

Citizens Coordinating Committee on Friendship Heights, Inc.

Testimony on: Analysis/Draft Environmental Impact Statement
Purple Line, Transit Line

Date: November 18, 2008

Thank you for this opportunity to testify. My name is Ron Tripp, and I am speaking tonight on behalf of the Citizens Coordinating Committee on Friendship Heights. The CCCFH is an umbrella organization representing 15 Civic associations south of downtown Bethesda. Representing over 10 thousand households, our organization has been an advocate for more livable communities in our down county region for more than 35 years.

For the past twenty years we have also been supporters of the Capital Crescent Trail ... from the time the right of way was purchased, through the wise decision to dedicate over half its length exclusively to trail use. But, it's been alarming to our communities to watch as the transitway has morphed from a single-track-trolley, connecting Bethesda with Silver Spring, to the massive 1.6 Billion dollar, sixteen mile, double tracked, multi-car-train proposed today. Justification, once thought to be traffic relief, is now expressly stated in the DEIS to be *economic development*, specifically naming *Bethesda* and *Connecticut Avenue at Chevy Chase Lake* as development opportunities.

The DEIS ignores the effect excessive development has on the livability of our communities, including added congestion on Connecticut Ave, Rockville Pike/Wisconsin Ave, and River Road. Since development is the justification, then the DEIS should include an expanded study of the direct and secondary impact of transit related development on the roadway network in and around Bethesda.

The DEIS also fails to address the huge impact the BRAC changes will have on our traffic. N-I-H and The Naval Medical Center will generate over 34,000 jobs (*nearly as many as in all of Bethesda, and equal to the jobs in Silver Spring*); and over one million visits to the Medical Center are expected annually. The County BRAC task force has called for a new entrance to the N-I-H Metro station on the east side of Wisconsin Avenue, which underscores the importance of public transportation there. Nonetheless, the DEIS fails to use the Purple Line as a tool in addressing this challenge. And, by tilting the studies in favor of the Bethesda Metro, the DEIS produces studies biased in favor of that connection.

At this preliminary stage we urge the state to acknowledge that BRAC has changed the underlying travel assumptions, and it requires that a Purple Line to the medical facilities be seriously studied. The low investment B-R-T option using Jones Bridge Road is poorly designed, ignores true B-R-T technology, and unfairly apportions costs not included in other options. When that B-R-T option is properly designed, when

Representing the Citizens Associations of Brookdale, Chevy Chase Village, Chevy Chase West, Drummond,
Green Acres-Glen Cove, Kenwood, Kenwood Condominium, Somerset, Somerset House I, Springfield, Sumner,
Sumner Village Community Assoc., Western Avenue, Westmoreland and Wood Acres

CCCFH Testimony on AA/DEIS (Purple Line)

costs are fairly apportioned, and when ridership correctly noted, B-R-T to BRAC is the most reasonable alternative.

Our other major concern is the huge negative impact transit will have on the present and future segments of the Capital Crescent Trail. Over 10,000 people use this trail each week. The loss of trees, the lack of adequate width for the safe use by this number of users, the limited access points, and the closure of the tunnel for trail users (*requiring a dangerous at grade crossing at Wisc Ave*) is an unacceptable price to pay when there is a ready alternative that removes the transit from much of the trail and also addresses the BRAC related expansion at the Naval Medical Center.

CCCFH shares and endorses the key principles set forth by the Coalition for the Capital Crescent Trail, the most important of which is trail *Continuity*.

- Any plan must include a *Continuous* off-road paved trail from downtown Bethesda to the Silver Spring Transit Center that avoids at-grade crossings.
- *Funding* for the trail must be included in the Purple Line project.
- The *Width* of the paved trail should be at least twelve (12) feet.
- A *Planted Buffer* should be constructed between the edges of the gravel buffer and the barrier to the transit line.
- *Local Neighborhood Access* to the trail must be maintained comparable to present access.
- *Integrate the Trail & Transit Line* so users can easily cross from one to the other as much as possible.
- Both *Trail and Transit should arrive at the Silver Spring Transit Center at the same level* with easy connections to Metro bus and rail, MARC Rail and the Met Branch Trail

Why destroy the Crescent Trail while ignoring the huge impact BRAC will have on traffic? Why rail? Why Bethesda? Instead of enriching Bethesda and Chevy Chase developers, let's save the trees, finish the trail, and address BRAC's impact on traffic.

- RECORD #1357 DETAIL

First Name :	Ron
Last Name :	Tripp
Business Name :	Citizens Coordinating Committee for Friendship Heights
Address :	5106 Saratoga Avenue
City :	Bethesda
State :	MD
Zip Code :	20816
Email Address :	

Submission Content/Notes : Thank you. I'm Ron Tripp.⁵ It's R-O-N, T-R-I-P-P. I'm speaking tonight on behalf of the Citizens Coordinating Committee in Friendship Heights, an umbrella organization representing 15 civic organizations south of downtown Bethesda. CCCFH representing over 10,000 households has been an advocate for more livable communities in our down county region for more than 35 years.

For the past 20 years we've also been supporters of the Capitol Crescent Trail and it's been alarming to watch as the transit way has morphed from a single track trolley from Bethesda to Silver Spring to the massive 1.6 billion dollar, Mile, twin track, multi-car train proposed today.

Justification once thought to be traffic relief as now expressly stated in the Draft to be economic development, specifically naming Bethesda and Connecticut Avenue at Chevy Chase Lake is development opportunities. The Draft ignores the affect that excessive development has on the livability of our communities, included added congestion on Connecticut and Wisconsin Avenues and River Road.

Since development is a justification, then the DEIS should include an expanded study of the direct and secondary impact of transit related development on the roadway network in and around Bethesda. The Draft also fails to address the huge impact the BRAC changes will have on our traffic. NIH and the Naval Medical Center will generate over 34,000 jobs and over one million visits to the Medical Center are expected annually.

The county BRAC task force has called for a new entrance to the NIH Metro Station east of Wisconsin Avenue, which underscores the importance of public transportation there. Nonetheless, the Draft fails to use the Purple Line as a tool in addressing this challenge. And by tilting the studies in favor of the Bethesda Metro, the Draft produces studies biased in favor of that connection.

At this preliminary state, we urge the state to acknowledge that BRAC has changed the underlying travel assumptions and it requires that a Purple Line to the medical facilities be seriously studied. The low investment BRT option using Jones Bridge Road is poorly designed, ignores true BRT technology, doesn't fairly apportions cost not included in other options. When that BRT option is properly designed, when costs are fairly apportioned and when ridership correctly noted, BRT to BRAC is the most reasonable alternative.

Our other major concern is the huge, negative impact transit will have on the present and future segments of the Capitol Crescent Trail. Over 10,000 people use this trail each week. The loss of trees, the lack of adequate width for the safe use by this number of users, the limited access points and the closure of the Wisconsin Avenue tunnel for trail users is an unacceptable price to pay when there's a ready alternative that removes the transit from much of the trail and also addresses the medical center expansion.

Why destroy the Crescent Trail while ignoring the huge impact BRAC will have on traffic, why rail, by Bethesda, instead of enriching Bethesda and Chevy Chase developers let's save the trees, finish the trail and address BRAC's impact on traffic? Thank you.

Attachments :

Written Testimony. CCC Friendship Hghts.pdf (2 mb)

- RECORD #1469 DETAIL

First Name : David
Last Name : O'Bryon
Business Name : City Homes of Bethesda
Address : 4906 Montgomery Lane
City : Bethesda
State : MD
Zip Code : 20814
Email Address :

Submission Content/Notes : My name is David O'Bryon, D-A-V-I-D, last name, capital O, apostrophe, capital B-R-Y-O-N. I reside at 3906 Montgomery Lane in Bethesda, Maryland, 20814. I'm testifying on behalf of city homes of Edgewater, we're a community of townhomes in downtown Bethesda. We're in favor of the Purple Line, we favor a Jones Bridge Road Alignment as being the best way to go.

Obviously, with the advent of Walter Reed's population moving to the Bethesda Navy Hospital site, Walter Reed had approximately one million visitors a year, so a large number of people will be moving into that arena and we think bypassing the Jones Bridge area would not be wise to do. And we think while the light rail is the preferable way to travel, Jones Bridge Road should be the alignment.

Obviously, the preferable route would be to underground from Bethesda to Silver Spring and working with the congressional delegations, we should be able to do that. I can recall when I was a congressional staffer working for two members of Montgomery County walking along 270 in order to get the Falls Road interchange provided for. I would think that if we do our planning we should think wisely about how we do this and if we take the time to plan it well now we need to make use of that Jones Bridge Road corridor and tie it back into the Metro. Thank you.

- RECORD #2145 DETAIL

First Name :	David
Last Name :	O'Bryon
Business Name :	City Homes of Bethesda
Address :	4906 Montgomery Lane
City :	Bethesda
State :	MD
Zip Code :	20814
Email Address :	
Submission Content/Notes :	
Attachments :	Comment Form. D. OBryon.pdf (872 kb)



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: David O'Bryon Organization: City Homes of Bethesda

Address: 4906 Montgomery Lane

City: Bethesda State: MD Zip Code: 20814

I/We wish to submit the following comments on this project: _____

On behalf of City Homes of Bethesda, a community of townhomes
in downtown Bethesda, we support the Low Investment
~~BRT~~ along Jones Bridge Rd. The turnaround should be
located at the current Bethesda Metro station if an
above ground option.

- RECORD #1139 DETAIL

First Name :	Andrew
Last Name :	Fellows
Business Name :	Clean Water Action
Address :	1010 Vermont Avenue, NW Suite 1100
City :	Washington
State :	DC
Zip Code :	20015
Email Address :	

Submission Content/Notes : Yes, my name is Andrew Fellows. First name Andrew, A-N-D-R-E-W, last name Fellows, F-E-L-L-O-W-S.

I'm the Chesapeake Regional Director for Clean Water Action which fully supports both this segment, the New Carrollton to Bethesda light rail purple line.

We support it if that were the only segment, but we also support an excited anticipation for an eventual circumferential route that encircles the Washington Metropolitan area.

This is the right kind of development. This is the right kind of transportation policy, and with the election of Barrack Obama, we are at the beginning of a new era in federal transportation policy that will be more transit friendly than the current administration, but it doesn't reduce the need for the State of Maryland to move really full speed ahead towards moving to more transit funding and looking to move projects like the purple line as quickly as possible.

The Bethesda to New Carrollton line both addresses some of the regional inequities. Historically in the Washington Metropolitan area as outlined in the Brookings Institution Region Divided report, it serves a corridor along University Boulevard that has one of the biggest ridership potentials in the entire Washington Metropolitan area.

I think the purple line alignment really should be focused on areas that have the highest ridership potential, and that includes the area of the University of Maryland looking to connect the center of campus to the proposed east campus to the coming east campus into the College Park Metro station.

What is especially exciting to proponents of clean water, when you think about the needs for investing in existing communities and finding ways of leveraging private sector dollars for stormwater retrofits and upgrades, that is a crucial part of restoring (inaudible) pasture river, which we're already going to be investing millions of dollars for that restoration, and also other tributaries to the Potomac River west of here like Rock Creek.

The need for finding transportation that serves existing communities that doesn't force individuals to be dependent on cars for a means of travel. It both reduces the vehicle miles trip, reduces the air pollution, addresses climate change by reducing the emissions and greenhouse gases.

But it also serves existing communities and further investment in our communities for things like water infrastructure upgrades for doing stormwater retrofits that are going to restore water quality to the Anacostia and Rock Creek.

Finally I say this partly because I'm the Chesapeake regional director of Clean Water Action, but as a resident of College Park, as a former College Park city council member, as a former Chair of the, Vice Chair of the Transportation Planning Board for the Washington Metropolitan Area, transit funding is in moving away from car dependent transportation funding and towards transit funding is a national wave and it's also an international wave.

So I thank you for holding this hearing and moving in this direction. Thank you.

- RECORD #2774 DETAIL

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Submission Content/Notes : PURPLE LINE TESTIMONY

BY

ANDREW FELLOWS,
CHESAPEAKE REGIONAL DIRECTOR OF CLEAN WATER ACTION

NOVEMBER 2008

. Clean Water Action fully supports the initial 16.4 mile segment of the Purple Line, and would support it if that were the only segment, though we also support it as the beginning of a circumferential line providing a rail alternative to the Washington Beltway.

. Light rail transit is much more likely than buses as a means of revitalizing and enhancing existing communities along the proposed Purple Line corridor.

. The Purple Line will inspire re-development, which is important to restoring regional water quality in a number of ways: It takes advantage of existing water infrastructure, rather than requiring new pipelines and wastewater systems; it speeds the upgrade and repair of that existing water infrastructure; it leverages private sector dollars to share part of the cost of retrofit upgrade for stormwater management (reducing flooding, wastewater pipe breaks, drinking water pipe breaks, reducing the quantity and velocity of the flow of stormwater, which erodes banks and pollutes our streams in multiple ways. We are in the process of investing millions of dollars in restoring the Anacostia River and it's tributaries here in Prince George's County and in Montgomery County. The Purple Line, by spurring new investments in our communities, is a crucial part of that restoration. Similarly, it is a key part of the restoration of other tributaries of the Potomac River, such as Rock Creek.

. The Purple Line will reduce the demand for unsustainable sprawl development which requires new water and transportation infrastructure on current farmland or undeveloped green belts outside of the existing suburbs. It is the anti-ICC – which is a \$3 billion project to add automobile and truck capacity to a region, while providing no relief for existing traffic congestion. The Purple Line reduces the perception of need to sprawl ever outwards, and thus reduce the demand for ruining the headwaters of many of the tributaries that flow through our communities, such as the Paint Branch here in College Park.

. By providing one-seat rapid transit service for the most transit-dependent community in the metropolitan region outside the District of Columbia: the Adelphi, Langley Park, Takoma Park and Long Branch communities in the International Corridor along University Boulevard, the Purple Line will help address the longstanding regional inequities of transportation planning and land use, as outlined in the Brookings Institution study entitled "A Region Divided."

. Here in College Park, it will connect the center of campus with the coming East Campus and the College Park Metro. It will provide an alternative to driving to and from College Park and our campus.

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Attachments :

Clean Water Action.pdf (26 kb)

PURPLE LINE TESTIMONY

BY

**ANDREW FELLOWS,
CHESAPEAKE REGIONAL DIRECTOR OF CLEAN WATER ACTION**

NOVEMBER 2008

. Clean Water Action fully supports the initial 16.4 mile segment of the Purple Line, and would support it if that were the only segment, though we also support it as the beginning of a circumferential line providing a rail alternative to the Washington Beltway.

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. Here in College Park, it will connect the center of campus with the coming East Campus and the College Park Metro. It will provide an alternative to driving to and from College Park and our campus.

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- RECORD #86 DETAIL

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Submission Content/Notes : When are the next public meetings related to the purple line? Is it the the DEIS or EIS public meetings?

Thank you.

- RECORD #1351 DETAIL

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Submission Content/Notes : My name is Stewart Schwartz. My name is spelled S-T-E-W-A-R-T, S-C-H-W-A-R-T-Z. I am the executive director for the coalition for smarter growth. We are an 11-year-old regional organization working in Maryland, D.C. and Virginia founded by many of the regions leading conservation groups, many of whom have been working on transportation and land use solutions for this region since even before our formation.

We're focused on ensuring transportation and develop decisions are made with genuine community involvement and accommodate growth in a sustainable way while revitalizing communities, providing more housing and travel choices and conserving our natural and historic areas.

We strongly support the light rail alternative directly connecting downtown Bethesda with Silver Spring, Langley Park, the heart of the University of Maryland campus on Campus Drive, Riverdale Park and the New Carrollton Transit Center. Our endorsement follows detailed analysis of the study findings, including the bus alternatives sited by the town of Chevy Chase. We recognize, and certainly understand, the complexities and the local concern over the near term loss of trees. We are an environmental organization and we know that your community and this community here is filled with strong environmentalists.

But it is our conviction that the light rail alternative along the Georgetown Branch right-of-way offers the best solution for the environment for this region.

LRT moves the most people in the shortest time, diverts more auto traffic, consumes less energy, emits less pollution and greenhouse gases and are far more effective at promoting revitalization and other non-auto trips by walking and biking. We would also site WABA, the Washington Area Bicyclists Association, endorsement of the project.

The Classic Chesapeake Bay Foundation report networkable communities demonstrated that a network of transit and transit oriented development would significantly reduce driving and traffic while also reducing the loss of land, forest and filtering so necessary for saving the bay. Global warming is the greatest environmental threat that we face. And rising energy prices, inevitable with less oil and world growth, threaten our economy, competitiveness and national security.

Buildings and transportation are 75 to 80 percent of our pollution and our energy use. Transportation is a third of this, overall the total use. It's going to be green buildings and transit friendly, transit accessible walkable neighborhoods that will be the key.

Creating this network of transit oriented development is what this region needs to do and every region in our country needs to do. At the same time, investment in light rail will help anchor our older communities, enhance property values and bring new housing and business opportunities. It offers permanence and connects the jobs of the west side of the region to the workers on the east side but also will in the future, also help us promote more jobs on the east side of the region.

It is critical to the revitalization of our neighboring community of Prince George's County. It would be disastrous if division in this community resulted in this project not moving forward, particularly not moving forward as a light rail project and that we would end up with more sprawling development throughout our region, more highway projects that don't solve congestion. The best long-term solution for this region and for this nation are networks of transit tied particularly to light rail

transit.

Not to exclude bus transit in their appropriate places, but that is what we're going to need for the future, for economic competitiveness and to stop and fight climate change. We strongly endorse the Purple Line and the light rail. Thank you.

- RECORD #2190 DETAIL

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Submission Content/Notes :
Attachments : Written Testimony. Coalition 4Cptl Crscent Trl.pdf (3 mb)

Speaker # 3 - Peter Gray



P.O. Box 30703
Bethesda, MD 20824

November 18, 2008

Diane Ratclif
MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratclif:

Below is written testimony, on behalf of the Coalition for the Capital Crescent Trail, given today at an MTA public hearing at the 4-H Conference Center on the Purple Line DEIS/AA.

My name is Peter Gray and I am the chair of the Coalition for the Capital Crescent Trail Board. The Coalition spearheaded the effort to have Montgomery County and the National Park Service obtain the Georgetown Branch railroad right-of-way abandoned by the B&O railroad in the 1980's and to then build the current Capital Crescent Trail, including the portion between Wisconsin Avenue and Stewart Avenue over which the Purple Line may one day run. In our 22 years as an organization we have raised hundreds of thousands of dollars and contributed to many projects along the Trail including the bump outs on the Rock Creek bridge, the anti-graffiti fence and additional lighting inside the Wisconsin Avenue tunnel and the ongoing effort to build a rest area by River Road. We have also engaged in continuous advocacy efforts to ensure that the Trail is usable and safe for all users.

We, along with the Montgomery Parks and Transportation Departments have been so successful that today the Trail is used by hundreds of thousands of walkers, bicyclists, and runners, making it one of the most used trails in the area, and maybe the nation.

It is my purpose in giving this testimony today to outline some important principles that we hope will guide MTA and Montgomery County in shaping the Purple Line plans and the impact of those plans on the Capital Crescent Trail.

1. We want to strongly emphasize the principle of **Continuity** - the end result of the Purple Line project must be a continuous, off-road trail without interruption between downtown Bethesda and the Transit Center in downtown Silver Spring. This means keeping the Trail in the tunnel under Wisconsin, and avoiding at-grade crossings at

Connecticut, Jones Mill Road, 16th street and Colesville Road. This includes having portions of the Trail placed in the CSX right-of-way where necessary.

2. **Funding for the completed trail must be identified** as part of the overall Purple Line project. Responsibility for the design, construction and maintenance of the Trail must be clearly stated, including all costs for grading, fencing, retaining walls, landscaping, and necessary public amenities. No part of the Purple Line transit way should begin construction until funding for the Capital Crescent Trail is assured.

The DEIS/AA unfortunately has language that appears to place total responsibility for funding of a completed Capital Crescent Trail from Bethesda to the Silver Spring Transit Center completely in the hands of Montgomery County. This raises fears that the Trail will be sacrificed from the project when costs rise. At the same time, the DEIS does not have a separate section detailing plans for the Trail. There are significant omissions and inconsistencies regarding the Trail in the DEIS which the Coalition will address in written form to the MTA and others at a latter date this year. These omissions and inconsistencies involve factual issues that should be sorted out before finishing the final version of the EIS

3. **Minimum width of the Trail should be 12 feet paved** with two feet of gravel on either side, except west of Pearl Street and approaching the Silver Spring Transit Center where the right-of-way may only accommodate a narrower 10 foot wide paved Trail. At these two points special measures will be necessary to insure the safety of trail users. Perhaps as a result of the numerous accidents on the CCT where there is severe congestion, County planning staff has acknowledged that a 12 foot paved width would be safer than a narrower trail width.

4. **Maintain a 10 foot planted buffer** between the edges of the gravel buffer and the fence or retaining wall adjacent to the LRT/BRT. Maintain a planted buffer on the opposite side of the trail as well consistent with the illustrations being circulated by the MTA

5. **Maintain local neighborhood access to the Trail** at least equivalent to current access so that persons living close to the Trail can still access the Trail.

6. Ensure that **the Trail and the transit line are integrated** to the maximum extent possible. This means that Trail users can cross over to the transit stations as easily as possible so the Trail users can most easily use mass transit.

7. **Silver Spring Transit Center connections** - once the Trail and transit cross Colesville Road both should be at the same level and the Trail users should also easily connect to the Red Line, to buses, to MARC, and seamlessly go on to the Metropolitan Branch Trail, with Met Branch users able to connect as easily as possible to all forms of Transit and the Capital Crescent Trail also.

8. Of the six build alternatives, **one would avoid impacts to the Trail from Bethesda to Jones Mill Road.** A variation of that alternative shown in the DEIS on figure 2-5 "Medium Investment BRT on Jones Bridge Road" would still have the added benefit to Trail users of providing a direct, off road access into the Silver Spring Transit Station. While we recognize that there are many considerations that will influence the ultimate decision on the locally preferred alternative, as advocates for the Capital Crescent Trail we note that this alternative has the least adverse impact to the Trail and it provides direct Trail access into Bethesda through the Wisconsin Ave Tunnel on the west, and a direct Trail access through the CSX tracks into Silver Spring on the east. However, due to lack of specifics for this and other options, the CCCT is not prepared to endorse any option at this point.

cc: Montgomery County Planning Board
 Montgomery County Council
 Montgomery County Executive, Isiah Leggett
 Maryland Purple Line Advisory Group

- RECORD #1334 DETAIL

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Submission Content/Notes : My name is Peter Gray, P-E-T-E-R, G-R-A-Y. I'm the Chair of the Coalition for the Capitol Crescent Trail Board. The Coalition spearhead of the effort to have Montgomery County National Park Service obtain the Georgetown Branch Railroad right- of-way in the 80's and to then build the current Capitol Crescent Trail, including the portion over which the Purple Line may one day run.

Coalition has raised hundreds of thousands of dollars and contributed to many projects along the trail, including the bumpouts and the Rock Creek Bridge, and additional lighting inside the Wisconsin Avenue Tunnel. We've also engaged in continuous advocacy efforts to ensure the trail is usable and safe for all users.

Today, the trail is used by hundreds of thousands of walkers, bicyclists and runners, making it one of the most used trails in the area, if not the nation.

It's my purpose in giving this testimony to outline some important principals that we hope will guide MTA and Montgomery County in shaping the Purple Line plans and the impact of those plans on the trail. We want to strongly emphasize first the principal of continuity. The end result of the Purple Line project must be continuous, off road trail without interruption between downtown Bethesda and the transit center in downtown Silver Spring. This means keeping the trail inside the tunnel under Wisconsin Avenue and avoiding at-grade crossings at Connecticut, Jones Mill Road, 16th Street and Colesville Road. Includes putting portions of the trail in the CSX right-of-way where necessary.

Number two, funding for the completed trail must be identified as part of the overall project. No part of the Purple Line transit way should begin construction until funding for the Capitol Crescent Trail is assured.

The DEISAA unfortunately has language that appears to place total responsibility for the funding of the trail as completed, completely in the hands of Montgomery County. This raises fears that the trail will be sacrificed from the project when costs rise.

At the same time, the DEIS does not have a separate section detailing plans for the trail. There are also significant omissions and inconsistencies regarding the trail in the DEIS which the coalition will address in written form to the MTA and others at a later date. These omissions and inconsistencies involve factual issues that need to be sorted out before finishing the final version of the ENVIRONMENTAL IMPACT STATEMENT.

Finally, a minimum width of the trail should be 12 feet paved, not 10 feet as noted in the DEIS, which two feet of grab on either side, except where the right-of-way can only accommodate a narrower, wide, narrower paved trail. County planning staff has acknowledged that a 12-foot paved width would be safer than a narrower one. In short, we need to have the trail be completed, off road, continuous and fully funded. Thank you.

- RECORD #3003 DETAIL

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Submission Content/Notes : Hi Diane, Greetings from Ellicott City and Happy New Year. We at CPABC fully support the Purple Line (Just Like Metro) and Bike Trails along the Purple Line. We believe in Rails/Trails and Trails with Rails. The Purple Line is well overdue and needs to move ahead. The UofM in College Park is the largest auto destination (100,000 Auto Trips per Day) and needs a good mass transit connection from the west where most of the students/faculty live. Hope to see you in Annapolis for our 12th Annual Bicycle Symposium on Wed. Feb 4., 2009. Thank youi for all your great work over the years. Bill K. Chair-CPABC.

- RECORD #392 DETAIL

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Submission Content/Notes :
Attachments : Scan001.pdf (111 kb)

Columbia Country Club
Chevy Chase, Maryland 20815

November 17, 2008

VIA EMAIL AND OVERNIGHT DELIVERY

Mr. Michael D. Madden
Project Manager, Office of Planning
Maryland Transit Authority
6 St. Paul Street
Baltimore, MD 21202

Re: Purple Line

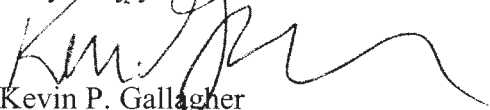
Dear Mr. Madden:

Columbia Country Club requests that MTA provide to us the information identified in the attachment to this letter. The requested information consists of specified factual and technical material MTA utilized in developing the Purple Line Alternatives Analysis/Draft Environmental Impact Statement ("AA/DEIS"). Disclosure of the information is necessary for us, or any other member of the public, to meaningfully review, and comment upon, MTA's analysis of the Purple Line's costs and asserted user benefits.

We will be happy to visit with you to facilitate prompt release of the requested information in an efficient manner. We emphasize that we are seeking only copies of existing materials and records, many of which are in electronic format. Timely receipt of this information is essential in light of the January 14, 2009 deadline for submitting written comments on the AA/DEIS.

We assume that MTA will provide the requested information without the need for the Club to submit a formal request under governing public records laws, but we are prepared to make such a request if that becomes necessary. I will call to follow-up with you.

Very truly yours,


Kevin P. Gallagher
Club Counsel

Attachment

A. Operating and Maintenance Cost Estimates

1. Please provide the estimated number of revenue vehicle hours, scheduled revenue vehicle miles and peak number of vehicles for each alternative used to develop the annual incremental operating and maintenance (“O&M”) expenses shown in Tables 4-7 and 4-8 of the “Operating and Maintenance Cost Estimate Technical Report” (“O&M Technical Report”).
2. Please provide the one-way track miles for each Bus Rapid Transit (“BRT”) and Light Rail Transit (“LRT”) used to develop the annual incremental O&M expenses shown in Tables 4-7 and 4-8 of the O&M Technical Report.
3. Please provide a corrected version of Table 4-1 of the O&M Technical Report.
4. Please provide the electronic workpapers in spreadsheet formats that detail the development of the annual incremental O&M expenses included in Tables 4-7 and 4-8 of the O&M Technical Report.
5. Please explain the link, if any, between the statistics shown in Table 4-6 of the O&M Technical Report to the statistics used to develop the annual incremental O&M Expenses in the same report.
6. Please provide the electronic workpapers in spreadsheet formats that detail the annual change in Systemwide Farebox Revenues included in table 5-2 of the Purple Line Alternatives Analysis Draft Environmental Impact Statement (“DEIS”).

B. Capital Cost Estimates

7. Please provide in a spreadsheet format the Unit Cost Library (“UCL”) included in Appendix A to the Capital Cost Estimating Methodology Technical Report (“Capital Cost Report”).
8. Please provide an electronic copy of the cost information database used to develop the capital costs for each alternative as described in Sections 4.2.3 and 4.2.4 of the Capital Cost Report, including all links to the UCL and links to any separate databases which contain the quantity and units for each transit alternative.
9. Please provide electronic copies of the Federal Transit Authority (“FTA”) Standard Cost Category (“SCC”) Excel worksheets used to develop the cash flow projections for each alternative as described in Section 4.2.5 of the Capital Cost Report.
10. Please provide the electronic workpapers used to develop the capital cost estimates shown in Table 6-1 of the Capital Cost Report.

11. Please provide the electronic workpapers used to calculate the Annualized Capital Costs shown in Table 6-3 of the DEIS.

C. User Benefits

12. Please provide the electronic workpapers used to develop the Annualized Cost Per Hour of Unit Benefits shown in Tables 6-2 and 6-3 of the DEIS.
13. Please provide the electronic workpapers used to develop the Annualized Cost Per New Rider Relative to the No Build Alternative shown in Table 6-2 of the DEIS.

D. Travel Demand Forecasting Technical Report

14. Please provide the AECOM Transit original mode choice calibration report, including all mode choice coefficient values.
15. To the extent that the MTA recalibrated the MWCOG/AECOM Transit model, please provide the calibration report, including all mode choice coefficient values.
16. Please provide the model script files, all necessary input files, and all necessary supplemental programs to replicate the model run that represents the final calibration scenario of the mode choice model for this project. That is, the calibration run of the model immediately prior to its use in this study.
17. Please provide the electronic workpapers used to develop the estimate of transit link speed for each alternative described in Section 2 of the Travel Demand Forecasting Technical Report.
18. Please provide all workpapers supporting the figures shown in Table 3-58 (“Non-Included Attributes”) in the Travel Demand Forecasting Technical Report.
19. For each alternative described in Section 2 of the Travel Demand Forecasting Technical Report, please provide the following AECOM Transit model input files:
 - a) Zonal walk times and percent walk to transit;
 - b) Highway networks and transit line files;
 - c) MWCOG station files;
 - d) Sidewalk links;
 - e) PnR links;
 - f) Transit station connector links; and
 - g) Any other special links.

- RECORD #3241 DETAIL

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Submission Content/Notes :

Attachments : Country Club Comments.pdf (27 mb)
Columbia Country Club_Supplemental Comments.pdf (2 mb)

**COLUMBIA COUNTRY CLUB'S COMMENTS ON
THE PURPLE LINE ALTERNATIVES ANALYSIS/DRAFT
ENVIRONMENTAL IMPACT STATEMENT**

**Submitted by: Kevin P. Gallagher
Club Counsel
Columbia Country Club
7900 Connecticut Avenue
Chevy Chase, MD 20815**

Dated: January 13, 2009

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COLUMBIA COUNTRY CLUB'S COMMENTS ON
THE PURPLE LINE ALTERNATIVES ANALYSIS/DRAFT
ENVIRONMENTAL IMPACT STATEMENT

Columbia Country Club ("CCC") presents the following Comments on the Purple Line Alternatives Analysis/Draft Environmental Impact Statement ("AA/DEIS") released by the Maryland Transit Administration ("MTA") on October 17, 2008.

PREFACE AND SUMMARY

The AA/DEIS confirms many of the points that CCC, and numerous other interested members of the public, have been making for years about the proposed Purple Line. The AA/DEIS candidly acknowledges that construction of the Purple Line will not generate many new transit riders; will not meaningfully reduce traffic congestion in the Purple Line corridor; and will have little or no effect on the overall energy consumed in the project area.

The AA/DEIS also candidly admits that the State of Maryland does not have the money to fund its share of the Purple Line costs, which may run into the billions of dollars; that the State has no plan in place to secure these funds other than to speculate about the imposition of "new taxes;" and that the projected

Purple Line fares will not come close to covering the Purple Line's annual operating expenses, thus necessitating further subsidies from Maryland taxpayers.

Despite these findings, MTA asserts that proceeding with construction of the Purple Line is in the public interest because it will reduce transit times for existing transit riders in the Purple Line corridor; it will qualify for funding under Federal Transit Administration ("FTA") cost/benefit formulas; and it will not cause any significant adverse impacts in the project area. MTA's analyses here are flawed in numerous, fundamental respects.

First, CCC has retained two nationally respected experts, Mr. Thomas D. Crowley and Mr. William G. Allen, Jr., P.E., to review MTA's calculation of the key components in MTA's cost/benefit economic analyses – the capital costs to construct the Purple Line, the costs of operating the Purple Line, and the benefits that may accrue, including travel time savings. Both experts conclude that MTA has not provided the public with anywhere near the level of information that the public needs to adequately review and analyze these MTA calculations. This failure violates the law.

MTA's legal failings here are particularly egregious here given the fact that FTA has expressed repeated concerns and frustration over project sponsors submitting transit proposals for federal funding that understate project costs and overstate project benefits; the fact that even the skeletal set of materials MTA has produced are riddled with errors that appear to understate project costs and overstate project benefits; and the fact that MTA's figures also appear to

understate project costs and overstate benefits when compared to actual costs incurred, and benefits realized, by comparable existing transit systems. MTA also has not demonstrated that it can meet FTA's local funding commitment standards.

Second, CCC has retained one of the nation's foremost authorities on rail/transit safety, Mr. Paul H. Reistrup, to review MTA's discussion of Purple Line rail safety issues. Mr. Reistrup concludes that MTA has failed to address, much less carefully consider, the consequential safety issues that are raised by its proposed Purple Line routings

For example, MTA proposes to route the Purple Line through densely populated residential neighborhoods. Any such plans always raise consequential safety issues where, as here, the lines are in close proximity to schools, parks, yards and other areas where children congregate. See, e.g., Indiana Ohio Ry. Co. – Construction and Operation – Butler, Warren and Hamilton Counties, OH, 9 I.C.C. 2d 783 (1993) ("Indiana Ohio") (Interstate Commerce Commission ("ICC") rejects proposal to build a new rail line through a densely populated residential suburb on grounds that even with mitigating measures, including fences and crossing warnings, the risk of injury, particularly to children, was too great). MTA simply ignores these consequential safety issues in the AA/DEIS.

MTA also ignores the very serious safety issues associated with its proposal that the Purple Line run within a few feet of the very active Georgetown Branch trail. Since the beginning of rail and transit operations, children, and some

adults, have been fascinated with getting a close look at these operations, which, unfortunately, frequently leads to tragic accidents. The risk that children, and others, may obtain unauthorized access to transit lines, and be struck, is dramatically increased by placing an invited use (a trail) within a few feet of a hazardous use (a transit line). Again, MTA simply ignores these obvious safety issues in the AA/DEIS.

MTA next ignores the safety risks associated with light rail derailments along the Georgetown Branch trail. Federal guidelines recommend that transit planners place fast, frequently moving rail transit lines at least twenty-five feet from any trails. This buffer is designed to protect trail users in the event of a derailment. When a train derails, cars can careen off the track. The twenty-five foot buffer is intended to provide room so that derailed cars will not reach a trail. MTA ignores these suggested federal guidelines and instead proposes to place the trail much closer to the transit lines. As with other consequential safety issues, MTA does not address the fact that placing a trail so close to a transit line can have devastating consequences in the event of a derailment.

Similarly, MTA ignores many other consequential safety issues, including issues that arise due to MTA's plans to place the Purple Line Light Rail transit ("LRT") in close proximity to CSX Transportation, Inc.'s ("CSXT") mainline tracks in Silver Spring and issues that arise in forcing the LRT into the middle of the University of Maryland campus.

Third, MTA analyses erroneously conclude that construction of the Purple Line along the Georgetown Branch right-of-way west of Connecticut Avenue will not cause significant, devastating impacts on CCC. As Club representatives have repeatedly explained to MTA, and reiterate in these Comments, the currently proposed routing of the Purple Line through CCC will result in the physical destruction of the heart of the golf course. Constantly running trains or buses through the course will also bring about significant additional damage in the form of substantially increased noise, vibration and adverse visual impacts.

MTA's factual conclusions are not only wrong, they are unlawful. CCC is one of the most historic golf courses in the United States, and is eligible for inclusion in the National Register of Historic Places. This eligibility triggers special planning requirements and protections under federal law, including the National Environmental Policy Act of 1969 ("NEPA"); the National Historic Preservation Act of 1966; 49 U.S.C. § 303 (formerly Department of Transportation Act of 1966, § 4(f)); and other laws. MTA appears to be attempting to avoid compliance with these laws by mistakenly claiming that construction of the Purple Line along the Georgetown Branch right-of-way will not significantly, and adversely, impact CCC.

Fourth, MTA generally concludes that introduction of the Purple Line will not cause significant adverse sound, vibration or visual impacts in the Purple Line corridor. CCC retained a leading national environmental expert, Mr.

Stephen G. Thornhill, to review MTA's discussion of Purple Line sound, vibration and visual issues. Mr. Thornhill found that the materials included in the AA/DEIS, and accompanying reports, do not provide the underlying data and analyses needed for the public to understand or evaluate MTA's conclusions. Just like MTA's cost/benefit analyses, MTA's review of sound and vibration issues are "black boxed" to prevent meaningful public scrutiny. Mr. Thornhill also found that construction and operation of the Purple Line along the Georgetown Branch right-of-way would increase noise and vibration in this corridor, and substantially alter its park-like visual setting.

Fifth, MTA's analysis of project alternatives is flawed. As shown in Mr. Allen's verified statement ("V.S."), MTA can best meet the needs of transit riders in the Purple Line corridor by providing improved shuttle bus service to current Metro Stations. This is a low-cost option and one that will not cause any of the significant adverse impacts associated with the build alternatives discussed in the AA/DEIS.

IDENTITY AND INTEREST

CCC is one of the nation's oldest golf clubs. CCC was initially formed in 1898 and formally incorporated as CCC in 1909. CCC's current golf course, located in Chevy Chase, Maryland opened in 1911. As discussed in more detail in these Comments, CCC's golf course is one of the most historic golf courses in the United States. In 1995, the nation's leading golf publication, Golf Digest, designated CCC as one of "America's Historic Golf Landmarks." CCC

was one of only six courses in the United States to be initially selected, joining the likes of Pebble Beach Golf Links and Oakmont Country Club.

CCC has several related interests in this proceeding. Five of the six Purple Line build alternatives will be routed through CCC. These routes will destroy the golf course. Many of CCC's members are also avid users of the Georgetown Branch trail and construction of the Purple Line along the Georgetown Branch right-of-way will destroy the trail. Finally, most of CCC's members are residents of the State of Maryland and, as Maryland taxpayers and users of Maryland transportation infrastructure, they have a direct interest in seeing that the State expends tax dollars on transportation projects that will be most beneficial to Maryland residents.

I.

THE AA/DEIS CONFIRMS THAT CONSTRUCTION OF THE PURPLE LINE IS NOT IN THE PUBLIC INTEREST

In the AA/DEIS, MTA affirms many points that opponents of the Purple Line have been making for years, including the following:

A. The Purple Line Will Not Generate Many New Transit Riders

As discussed below, MTA's Purple Line ridership forecasts appear to be significantly overstated, but even assuming that MTA's ridership forecasts are correct, they show that construction of the Purple Line will not generate many new transit riders. Specifically, MTA projects that in 2030, the no-build option will result in 1,355,395 daily regional transit trips, the Transportation System

Management (“TSM”) option will result in 1,363,585 daily regional transit trips, and the high investment LRT option will result in 1,376,167 daily regional transit trips. AA/DEIS at 3-5, Table 3-8.

Thus, MTA’s own figures show that “[t]he Build alternatives would generate approximately a one percent increase in total regional transit ridership over the No-Build alternative, while the TSM would generate approximately one half percent increase in total regional transit ridership.” Id.

B. The Purple Line Will Not Reduce Traffic Congestion

MTA finds that construction of the Purple Line will not have any meaningful impact on traffic congestion in the Purple Line corridor. This finding follows naturally from the fact that the Purple Line will not attract many new transit riders. Specifically, MTA finds that “[t]he reduction in daily vehicle trips under the various Build alternatives represents changes in the magnitude of 0.04 to 0.07 percent relative to the No Build alternative” (id. at 3-9 col. 1); “intersections are expected to continue to operate at unacceptable levels of service . . . under the No Build and Build Alternatives” (id. at 3-14 col. 3); “[t]he build alternatives are generally expected to maintain traffic conditions” (id. at 3-14 col. 4); and “the amount of . . . traffic on any given street . . . [will] not be noticeably different.” Id. at 4-84 col. 2.

These MTA findings are very significant. The number one transportation problem in the metropolitan Washington D.C. area is traffic

congestion. MTA admits that constructing the Purple Line will not meaningfully reduce this congestion.

C. The Purple Line Will Not Reduce Air Pollution

MTA finds that construction of the Purple Line “is predicted to have little to no effect on overall energy consumed in the project area” (id. at 4-87 col. 1) and, as a consequence, will have little to no impact on the reduction of greenhouse gas emissions in the Purple Line corridor. This finding also follows naturally from the facts that the Purple Line will not attract many new transit riders, nor reduce traffic congestion. Since motor vehicle traffic in the corridor will not be meaningfully reduced, air emissions will not be meaningfully reduced as well.

D. The Purple Line Will be Extraordinarily Expensive

As discussed below, MTA’s calculation of Purple Line costs are significantly understated. However, even MTA’s understated calculations show that construction and operation of the Purple Line Bus Rapid Transit (“BRT”) and LRT options will be extraordinarily expensive. MTA projects that the capital costs for the build options run from \$386.39 million to \$1,634.84 million and that annual operating costs for the build options run from \$17.3 million to \$26.4 million. AA/DEIS at 5-2, Table 5-1, 5-3 Table 5-2. These figures will be even higher if correctly calculated.

E. The State of Maryland Does Not Currently Have the Money to Fund its Share of Purple Line Costs

MTA hopes to secure approximately 50% to 60% of the money needed to build the Purple Line from the federal government. MTA admits that the State does not have sufficient revenues at this time to fund the remaining 40% to 50% share. As MTA explains, the Maryland Transportation Trust Fund (“TTF”) is the sole source for state-share transit funding in Maryland, including the funding of transit capital projects. The TTF is also used to fund projects involving several other transportation modes, including state highways. The TTF is facing substantial revenue shortfalls:

Revenues in the TTF . . . [are] not keeping up with the State’s transportation needs. . . . Estimates by [the Maryland Department of Transportation] projected a potential \$1.5 billion transportation-funding shortfall by 2008 and a \$40 billion shortfall over the next twenty years.

Id. at 5-5 col. 1. Given these huge revenue shortfalls, MTA acknowledges that the State does not have the funds needed to fund its share of the Purple Line financing.

MTA also admits that the Purple Line will not generate sufficient fare revenues to cover its operating costs. Thus, the funding of day-to-day operations of the Purple Line would “require a subsidy from some combination of state and local sources.” Id. at 5-4 col. 1. It appears that these funds, like the funds needed to build the Purple Line, could only be raised by imposing new “revenue enhancements” and “new taxes.” Id. at 5-5 col. 1, 6-9 col. 2.

F. The State of Maryland Has No Plan in Place to Raise the Missing Funds

MTA acknowledges that the State of Maryland will have to come up with additional in-state funding sources to finance the Purple Line. However, MTA offers no concrete proposals for raising these funds other than to speculate that these funds may be raised in the form of new “revenue enhancements” and “new taxes” at the state or local levels. Id. Left unsaid, and unaddressed, is when and how the State intends to ask for higher taxes and, if asked, whether the citizens of the State of Maryland can afford to pay higher taxes in these economically troubled times.

G. The Purple Line is Not a Metro Project, Nor Does it Meet its Initial Objective – Reducing Beltway Congestion

The Washington Metropolitan Area Transit Authority (“WMATA”) owns and operates the Washington Metrorail System. However, it is not WMATA that is proposing to build the Purple Line, it is the State of Maryland. WMATA gives names, by color, to the principal Metrorail lines, but WMATA did not adopt the Purple Line as a WMATA option or priority. The Purple Line is a State of Maryland project, not a WMATA project. Id. at 1-3 col. 1.

Also, the Purple Line will not fulfill the objectives it was initially proposed to meet. The Purple Line was initially proposed as an option to relieve traffic congestion on the Washington Beltway. Id. However, as the AA/DEIS again confirms, construction of the Purple Line will not reduce traffic congestion on the Beltway, nor anywhere else. Instead the project has morphed into

something altogether different. Its new purpose, according to MTA, is to “provide faster, more direct and more reliable east-west transit service in the Purple Line corridor.” Id. at ES-1 col. 3-4.

H. MTA’s Case for the Purple Line is Fundamentally Flawed

CCC submits that it makes no sense as a matter of public policy to spend billions of dollars on the Purple Line when construction of that line will not have any meaningful impact on resolving the principal transportation problem facing residents in the Purple Line corridor – traffic congestion. Nevertheless, MTA claims that the public interest may support construction of the Purple Line because (1) the project should qualify for federal funding; (2) construction of the Purple Line will not cause any adverse safety impacts; (3) construction of the Purple Line will not cause any adverse impacts on CCC; and (4) it is the best means to meet transit needs in the Purple Line corridor. As demonstrated below, MTA’s analysis in support of each of these contentions is arbitrary and capricious.

II.

MTA’S CLAIMS THAT THE PURPLE LINE WILL QUALIFY FOR FEDERAL FUNDING ARE FUNDAMENTALLY FLAWED

MTA plans on seeking “New Starts” federal funding for the Purple Line. To obtain these monies, MTA must demonstrate that the project meets governing FTA New Starts funding standards. These standards generally require that a project sponsor demonstrate that the proposed project is cost-effective, and that it has a viable plan to fund its share of the project costs.

In the AA/DEIS, MTA generally opines that the Purple Line build options are cost-effective under FTA standards and that the State of Maryland has presented a viable financing plan that complies with FTA standards. See, e.g., AA/DEIS at ES-11-12. However, MTA's analysis in support of both assertions is arbitrary and capricious.

A. MTA's Analysis of Project Costs and Benefits is Arbitrary

FTA uses a complex set of cost/benefit formulas to evaluate the cost effectiveness of New Starts transit projects. Key calculations on the cost side include project capital and operating costs. Key calculations on the benefit side include project ridership estimates and estimates of transit travel times. MTA's analysis of project costs and benefits is arbitrary because (1) MTA has not disclosed most of the data and assumptions used in its analysis; (2) the parts of the analysis MTA has released are riddled with consequential errors; and (3) the results of MTA's analysis are inconsistent with historical experience.

1. MTA Has Failed to Disclose Critically Important Cost-Benefit Study Data

MTA has asked the public to submit comments on its calculations of project costs and benefits. In response, CCC retained two nationally recognized experts to review MTA's calculations. Mr. Thomas D. Crowley was asked to review MTA's calculations of Purple Line capital and operating cost estimates. Mr. William G. Allen, Jr., P.E. was asked to review MTA's ridership and user benefit estimates. Statements from both experts are included in CCC's comments.

Mr. Crowley and Mr. Allen reached a common conclusion on one very basic point – the AA/DEIS, and accompanying technical reports, do not contain the supporting data and analyses (including spreadsheets and computer data backup) that they, or any other member of the public, need to fully evaluate the accuracy of MTA’s calculations and the methods MTA used to make these calculations. In effect, key parts of MTA’s analysis are contained in a “black box” that is not open for public inspection and comment. See Crowley V.S. at 2-6, Allen V.S. at 2, 5.

CCC requested that MTA provide specific missing data and analyses in letters to the MTA dated November 17 and November 20, 2008. In a letter dated December 22, 2008, MTA objected to providing most of the requested data and analyses that CCC needs to meaningfully comment on MTA’s calculations. See Crowley V.S. at 5, 6, Exhibit 5 and Allen V.S. at 2, 5-6.¹

MTA’s failure to provide the missing data is unlawful. Where, as here, a project sponsor has included detailed quantifications of project costs and benefits in an AA/DEIS, the data underlying the calculations must be made available for public inspection and comment.² The rationale for this rule is self-

¹ CCC received the data MTA did produce on January 9, 2009. CCC has not had sufficient time to review the recently provided data. CCC reserves the right to supplement its Comments, after the close of the comment period, to address the new material.

² See, e.g., Sierra Club v. United States Forest Service, 878 F. Supp. 1295, 1310 (D.S.D. 1993) (“an agency [must] reveal[] the data and assumptions upon which a computer model is based”); Hughes River Watershed Conservancy v. Glickman, 81 F.3d 437, 446 (4th Cir. 1996) (“misleading economic assumptions can defeat . .

evident. The purpose of the public comment process is to ensure that project sponsors “make available the relevant information, and open to public scrutiny their decision making process.”³ These goals are clearly defeated when the agency fails to make relevant data available since the lack of production precludes meaningful public scrutiny of the project sponsor’s decision making process.

Full public disclosure of study data and analyses is particularly important because history has shown that New Starts project sponsors typically understate project costs, overstate project ridership, and overstate project benefits. As summarized last year by FTA Administrator James Simpson:

Our experience across hundreds of major transit projects shows that planners routinely over-estimate the benefits of mega-projects, and under-estimate the costs...

[A]gencies systematically over-estimate ridership forecasts, and under-estimate project costs.

Remarks of James S. Simpson, APTA Rail Conference, San Francisco, CA (June 2, 2008), available at www.fta.dot.gov/regional_offices_8247.html.⁴

. the function of an EIS”); cf. American Radio Relay League, Inc. v. FCC, 524 F.3d 227, 236 (D.C. Cir. 2008) (“Under [Administrative Procedure Act] notice and comment requirements, among the information that must be revealed for public evaluation are the technical studies and data upon which the agency relies”) (internal quotation marks omitted).

³ Audobon Naturalist Society of the Central Atlantic States, Inc. v. United States Dep’t of Transp., 524 F. Supp. 2d 642, 660-61 (D. Md. 2007); accord Washington Trollers Ass’n v. Kreps, 645 F.2d 684, 686 (9th Cir. 1981) (“To suppress meaningful comment by failure to disclose basic data relied upon is akin to rejecting comment altogether.”) (internal quotation marks omitted).

⁴ See also Allen V.S. at 6-7.

At the outset of the AA/DEIS, MTA states that “[t]he requirements of the AA process are intended to allow for an objective, efficient and fully informed evaluation and rating of the transit projects seeking funding under the Federal New Starts process.” AA/DEIS at P-1 col. 1. MTA’s failure to produce to data supporting its New Starts cost-benefit analyses prevents the public from providing the “fully informed” review MTA requested, but is now denying the public.

2. Cost-Benefit Data MTA Has Released is Riddled with Consequential Errors

While MTA has kept most of its analysis of the Purple Line costs and benefits in an inaccessible black box, the few portions of MTA’s analyses that are publicly available contain numerous consequential errors. These errors are detailed in the appended statements of Mr. Crowley and Mr. Allen, and include the following:

- MTA used an understated discount rate in calculating its annualized capital cost factor.
- MTA failed to include replacement cost estimates in its capital cost estimates.
- MTA used inconsistent inflation adjustments in making its capital cost estimates.
- MTA’s operating and maintenance (“O&M”) cost analysis understated historic inflation.
- MTA’s O&M cost analysis understated LRT car-hour unit costs.

- MTA understated BRT Guideway and Station costs.
- MTA's O&M cost validation process is improper.
- MTA has mistakenly reported ridership numbers by misunderstanding the difference between trips and trip ends.
- MTA has made a substantial error in its calculations of transit user benefits by not properly applying FTA formulas.

See Crowley V.S. at 7-18; Allen V.S. at 2-5 .

As Mr. Crowley and Mr. Allen explain, these errors are ones that result, or could result, in substantial overstatements in project benefits and understatements of project costs. While the full impact of these errors on MTA's overall calculations can be determined only if MTA supplies all the missing data CCC has requested, the errors that can be identified are clearly significant. For example, MTA's use of an understated discount rate is likely to result in understatements in annual capital costs "between 14.2 and 30.0 percent." Crowley V.S. at 9. Similarly, MTA's misstatement of car hour costs means "MTA's LRT O & M operating costs could be understated by at least 23 percent, if not more." Id. at 15.

3. MTA's Forecasts are Inconsistent with Actual Historical Experience

The credibility of MTA's forecasts of Purple Line ridership, user benefits, and operating costs is further undercut when these forecasts are compared

with the actual cost experience of other projects. As described in detail by Mr.

Allen and Mr. Crowley:

- Comparing MTA's Purple Line LRT ridership estimates (59,000 to 68,000 riders per day) to the actual ridership average for comparable systems (40,000 to 45,000 riders per day) suggests that the AA/DEIS ridership figures may be 40% too high.
- The assumed "high" Purple Line LRT average speed (19 mph) exceeds the actual average speed of 18 other systems (17.2 mph) by nearly 2 mph.
- MTA's calculation of LRT O & M costs per weekday passenger is well below both the mean and the median costs of 10 currently operating LRT systems.

See Allen V.S. at 9, 11; Crowley V.S. at 19-20.

B. MTA's Analysis of Local Funding Issues is Arbitrary

MTA's plans for financing the costs of the Purple Line are outlined in Chapter 5 of the AA/DEIS. MTA projects that 50 to 60 percent of the capital costs of the Purple Line will be funded by a major grant from the FTA under the Capital Investment Grant Program of 49 U.S.C. §5309, commonly called "New Starts" funding. MTA opines that the State of Maryland may meet federal standards to fund the remaining non-federal share of the Purple Line's capital costs. See, e.g., AA/DEIS at ES-12 col. 1 ("all the [Purple Line] alternatives are potentially [financially] feasible [under FTA standards]"). This analysis is arbitrary.

The federal funding requirements for major capital grants (i.e., those exceeding \$75 million) are defined in 49 U.S.C. 5309(d). Under that law, FTA is authorized to commit to a major capital grant only if the request is “supported by an acceptable degree of local financial commitment (including evidence of stable and dependable financing sources) to construct, maintain and operate the system” 49 U.S.C. 5309(d)(2)(C). In simple terms, that means that a State or local government is eligible to receive a major capital investment grant from FTA only if it can demonstrate that it has a reliable plan for providing the funds necessary to finance the nonfederal portion of the project’s capital needs, as well as the entirety of the funds needed to maintain and operate the system (which are not eligible for federal assistance). MTA presents no such plan.

First, MTA states it will seek New Starts funding from the FTA for between 50 and 60 percent of the project’s capital costs. AA/DEIS at 5-8 col. 4. Notwithstanding that projection, the AA/DEIS acknowledges that the trend in federal funding for New Starts projects has been to limit federal funds to “around 50 percent” due to intense competition for federal transit funding. Id. at 5-7 col. 1. Thus, MTA may try to seek more funds than FTA will grant.

Second, for the remaining capital funding, MTA expects the majority will come from the Maryland TTF, which is funded through motor vehicle fuel taxes, registration and title tax fees, a portion of corporate income and state sales taxes, and miscellaneous sources. Id. at 5-8 col. 4. As discussed above, the availability of TTF funds to pay Purple Line capital costs is highly speculative

at best. MTA acknowledges that “[the Maryland Department of Transportation] projected a potential \$1.5 billion [TTF] transportation-funding shortfall by 2008 and a \$40 billion shortfall over the next 20 years.” Id. at 5-5 col. 1. TTF revenues were increased by more than \$400 million a year via legislation passed in late 2007. Id. However, that is insufficient to make up the \$1.5 billion shortfall projected for 2008. MTA fails totally to explain how the State plans to make up that 2008 shortfall or the projected \$40 billion shortfall in TTF revenues over the next 20 years (an average of \$2 billion per year).

Third, MTA suggests that some additional Purple Line funding may come from Montgomery County and Prince Georges County, as well as from private sources such as real estate developers. Id. at 5-8 col. 1 and 2. MTA also assumes that Montgomery County will donate the Georgetown Branch right-of-way between Bethesda and the CSXT Metropolitan Branch and construct the Georgetown Branch Trail portion of the Purple Line. Id. at 5-12 col. 1. There is no indication in the AA/DEIS that any of these contributions from county or private sources have been quantified or agreed upon.

Fourth, MTA acknowledges that fare revenues from users of the Purple Line will not be sufficient to pay for estimated operating and maintenance costs. Id. at 5-4 col. 1. Therefore, the Purple Line will need operating and maintenance subsidies estimated in 2007 dollars to range from \$10.6 million to \$21.1 million annually. Id. at 5-3 (Table 5-2). According to the AA/DEIS, the operating subsidy would be funded by the TTF or other sources, including

possible county contributions. Id. at 5-8 col. 4. However the AA/DEIS fails to provide any plan for how such funds will in fact be raised in light of the TTF funding shortfalls and the absence of any commitments of County funds.

III.

MTA'S ANALYSIS OF SAFETY ISSUES IS FUNDAMENTALLY FLAWED

MTA summarily concludes in the AA/DEIS that its plans for construction of the Purple Line do not raise any significant safety issues. MTA reaches this conclusion because it has failed to undertake the legally required "hard look" at rail safety issues.⁵ As discussed below, and in the accompanying verified statement and report of Paul H. Reistrup, one of the nation's leading authorities on transit safety issues, had MTA undertaken a hard look at rail safety issues, it would have found that its Purple Line plans raise very significant safety issues that call into question the viability of MTA's proposed LRT routings.

⁵ NEPA, codified at 42 U.S.C. § 4321 et seq., requires that the AA/DEIS consider the impacts to the natural and human environment that the Purple Line will have as a prerequisite to Federal funding. The safety and security of the public are an essential component of a comprehensive impact analysis for a public transportation project such as the Purple Line. MTA must take a hard look at all NEPA issues, including rail safety. See Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 350 (1989) (agency must take "hard look" at NEPA issues); Alaska Wilderness League v. Kempthorne, 548 F.3d 815 (9th Cir. 2008) (vacating agency decision because agency failed to engage in the "hard look" analysis required by NEPA).

A. MTA Ignores the Safety Issues Associated with Injecting High Speed Transit Lines into Densely Populated Suburban Neighborhoods

MTA is proposing to insert the Purple Line into existing, densely populated suburban neighborhoods. Placing new rail or transit lines into such areas raises numerous safety issues which must be addressed in an environmental impact statement ("EIS"). The ICC's EIS in the Indiana Ohio case illustrates the proper approach.

In Indiana Ohio, a railroad proposed to build a new rail line in a densely populated suburb of Cincinnati, Ohio. If constructed, the proposed line would have passed "within 1,000 feet of 470 single family homes and 220 mobile homes, housing 2,100 people." Id. at 789. The ICC staff conducted an extensive public safety analysis of the railroad's proposal as part of its EIS review. Id. at 788-89. This analysis included a detailed review of the project area to determine how close the rail line would come to existing residences. Based upon its detailed review and analysis, the staff recommended that the ICC deny the railroad's construction request because of the safety risks associated with placing a new active rail line so close to the existing residences:

In analyzing the safety risks, [ICC Staff] has determined that potential effects on safety in the impacted area are directly related to the distance of the right-of-way to residences. In essence, the shorter the distance of the right-of-way from residences, the more likely a serious incident may occur.

Indiana Ohio, Final Environmental Impact Statement at 33 (April 30, 1992). ICC

staff was particularly concerned about the risk to children, a risk that the staff concluded could not be mitigated with fences or other protective devices:

The rail operation phase could present significant safety hazards to children who enter the railroad right-of-way.... Even with the introduction of mitigating measures such as fencing, the possibility of a pedestrian/train accident would not be totally eliminated.

Id., Draft Environmental Impact Statement at 77 (May 17, 1991). The ICC proceeded to adopt its staff recommendation and denied the railroad's construction application "[b]ecause of the serious public safety concerns that could not be adequately mitigated" Indiana Ohio at 790.

In stark contrast, MTA's analysis of rail safety issues in the AA/DEIS does not even acknowledge, much less take a hard look at, the rail safety issues associated with placing the Purple Line in densely populated residential neighborhoods in suburban Maryland. Had MTA done so it would have found that introduction of Purple Line into this area raises very serious safety issues that cannot be mitigated.

Unlike MTA, Mr. Reistrup did conduct a detailed safety review of the Purple Line corridor. He found that the proposed Purple Line LRT routes run very close to hundreds of homes in the project area. He also found that the proposed Purple Line routes run very close to several schools and day care centers. Finally, he found that the proposed Purple Line LRT routes run very close to the

Georgetown Branch Trail, part of one of the most heavily used recreational trails in the country. See Reistrup V.S. at 4, 7-9, 12-13, 16-17.⁶

All of these locations are most significant for safety purposes because they are places that children congregate and play, frequently without direct parental supervision. Mr. Reistrup concludes that the proximity of the Purple Line to residences and children raises serious safety issues:

It has long been recognized that railroad and rapid transit operations are an attractive nuisance for children who have been known to climb fences separating their yards and play areas from railroad/transit tracks with disastrous consequences when they are struck by passing trains. In addition to the two daycare centers, there are many residences whose yards abut the right-of-way for the proposed LRT tracks, both east and west of the Columbia CC property. The danger of children climbing the fence separating their play areas from the LRT tracks and trail, and getting injured or killed by LRT vehicles, is particularly acute given the frequency of LRT vehicle movements (every six minutes in each direction during peak hours and every ten minutes in each direction during other periods).

Reistrup V.S. at 8-9.

⁶ The Georgetown Branch Trail is part of the Capital Crescent Trail, which traverses densely populated residential areas in Bethesda, Silver Spring and Washington D.C. This Trail has been in existence for more than twenty years. It is widely regarded as one of the premier suburban trails in the United States. It also is among the most heavily used trails in the country with more than one million users annually according to recent trail usage surveys. Coalition for the Capital Crescent Trail, 2006 Trail Use Survey (Oct. 11, 2006) available at <http://www.cctrail.org/CCT2006survey.pdf>. The most intense use of the trail according to the 2006 survey is in Bethesda. Trail traffic there peaks as high as 565 uses per hour including cyclists, joggers, walkers, strollers, and other pedestrian traffic all utilizing a ten foot wide paved pathway.

Mr. Reistrup's conclusions are similar to those reached by the ICC in the Indiana Ohio case and reflect basic safety precepts long embedded in the railroad and transit industries. MTA's failure to identify, much less take a hard look at, this issue is inexcusable, and fails to provide state and federal decision-makers basic information they need to evaluate the Purple Line.

B. MTA Ignores the Safety Issues Associated with Placing the Purple Line within a Few Feet of the Georgetown Branch Trail

There are two principal safety issues that arise from MTA's proposal to place a trail along side the Purple Line in the Georgetown Branch right-of-way. MTA ignores each in the AA/DEIS. The first issue, discussed above, is the safety concerns that arise when a public agency places an invited use (the trail) in close proximity to a dangerous use (the light rail lines). This action substantially increases the risk that children, or others, will wander onto the light rail line and be hit by a train.

The second safety issue involves derailments. Placing a trail, or any other pedestrian use, next to an active rail or transit line raises serious safety concerns in the event of a derailment. When trains derail, cars are frequently catapulted from the rail or transit right-of-way. Any pedestrian that happens to be in the way will likely be killed or seriously injured.

Federal transportation planners addressed the safety issues associated with placing active rail/transit lines near trails in the 2002 "Rails-With-

Trails” Report.⁷ These planners found that when rails are placed near trails, “the risk of injury should a train derail will be high.” Id. at VII. The planners recommended that when transportation agencies look at putting rails near trails, the agencies undertake a detailed engineering analysis to determine, among other things, how far a trail should be from the centerline of the nearest LRT rail track (called a “setback”). The planners found that a “[s]etback of 7.6 m (25 feet) or greater often is needed for high speed train corridors.” Id.⁸ The purpose of the setback is to provide a sufficient physical buffer so that if a train derails, the likelihood that the derailed car will reach the trail is reduced.

Prior to issuing the AA/DEIS, MTA recognized that it should adhere to the Rails-With-Trails 25 foot setback standards in its Purple Line planning.⁹ Inexplicably, however, in the AA/DEIS, MTA failed to adhere to the Rails-With-Trails standards. Instead, MTA proposed a shorter 20 foot separation between the centerline of the LRT track and the edge of the trail. See Reistrup V.S. at 6-7. Also, MTA did not provide any explanation, or engineering analysis, explaining why it was not adhering to the 25 foot standard.

MTA’s failure to take a hard look at the setback issue is most consequential. As Mr. Reistrup explains, MTA’s failure to provide at least a 25

⁷ United States Department of Transportation, Rails-With-Trails: Lessons Learned, at 57 (Aug. 2002) (“Rails-With-Trails”).

⁸ DOT examined 65 instances where rails were placed near trails and found that the average setback was 33 feet. Rails-With-Trails at 62.

⁹ See MTA, Master Plan Alignment Trail (Feb. 2008).

associated with placing a specific high speed light rail line (the Purple Line) within a few feet of a specific trail (the heavily used Georgetown Branch Trail).

**C. MTA Ignores Safety Issues Associated
With the Shared Use of the CSXT Corridor**

MTA proposes that for a portion of the Purple Line LRT route, the LRT trains and CSXT trains share a common corridor. In this shared use corridor it appears that LRT tracks and the CSXT tracks will be only 20 to 25 feet apart. As Mr. Reistrup explains, placing the LRT tracks and the CSXT tracks so close together raises serious safety issues since, in the event of a derailment, the derailed cars or locomotives, can easily be projected onto the adjoining track, with devastating consequences. Reistrup V.S. at 13-15.

MTA does not address shared-use safety issues in the AA/DEIS. As Mr. Reistrup explains, CSXT is likely, at a minimum, to require that MTA include expensive crash walls to separate the LRT line from its rail line. See Reistrup V.S. at 15 (“I can testify from my own experience . . . that CSXT is unlikely to accommodate the proposed LRT alignment in this area unless a heavy crash wall is installed between its track and the nearest LRT track.”).

MTA also does not address the safety issues associated with putting yet another rail user in the shared use corridor. Currently, the CSXT tracks in the shared use area are used by CSXT freight trains, as well as by Amtrak and MARC passenger trains. Metro also operates heavy rail Red Line passenger trains in this shared use area. In 1996, one of the most tragic accidents in the history of

Maryland railroading occurred when an Amtrak train and a MARC train using these tracks collided. Eleven people died and more than twenty other persons were injured in this tragic accident.¹¹ In the AA/DEIS, MTA does not acknowledge this accident, nor address the many consequential safety issues that will arise if a fifth rail user (MTA) is granted access to the shared use corridor.

D. MTA Ignores the Safety Issues Associated With Forcing the Purple Line into the Middle of the University of Maryland Campus

The proposed LRT alignment on the University of Maryland Campus in College Park illustrates the extent to which the AA/DEIS glosses over real safety problems. MTA proposes that LRT trains would operate at grade (street) level on Campus Drive through the heart of the University of Maryland.¹² As the AA/DEIS notes, Campus Drive is subject to high pedestrian crossing volumes when classes are changing and during special events, such as football games.¹³ Under the Preinkert/Chapel Drive design option, the AA/DEIS proposes

¹¹ National Transportation Safety Board, "Collision and Derailment of Maryland Rail Commuter MARC Train 286 and National Railroad Passenger Corporation AMTRAK Train 29 Near Silver Spring, Maryland on February 16, 1996," NTSB Railroad Accident Report, PB97-916302 NTSB/RAR-97/02, July, 1997.

¹² Under the low and medium investment LRT alternatives, the light rail tracks would be at grade level across virtually the entire University of Maryland campus. A half-mile tunnel under part of the campus is provided under the high investment LRT alternative, but the tracks would still be at street level through about half of the campus.

¹³ AA/DEIS at 4-84 col. 4.

to inject Purple Line services, Campus Shuttles and other bus services into “a largely pedestrian-oriented campus triangle environment.”¹⁴

Clearly the interaction of thousands of students walking to and from classes and existing vehicular traffic is a dangerous environment under the present circumstances. These safety problems will be exacerbated greatly by the insertion of at-grade LRT. However, the sum total of the safety analysis and mitigating measures proposed in the AA/DEIS is that “various measures would be needed to alert pedestrians to the presence of the transit vehicles”¹⁵ followed by MTA dismissing any impact by stating that “[t]he Build Alternatives that would operate along Campus Drive would be comparable to typical urban and major activity centers where BRT and LRT services safely operate throughout the United States and Europe, including a number of university and college environments.”¹⁶

This is not an adequate, hard-look safety analysis. The AA/DEIS conclusion presupposes the outcome. It amounts to little more than an unsubstantiated statement that MTA should be able to introduce safety mitigation procedures because other locales in the United States and abroad have been able to do so. Apart from the fact that environmental settings, setback width, grade separation factors are not transferable, MTA fails to acknowledge that some of the

¹⁴ Id. at 4-84 col. 4.

¹⁵ Id. at 4-85 col. 1.

¹⁶ Id. at 4-84 col. 4.

exemplar LRT projects it commonly cites are plagued with safety and security problems.¹⁷

E. MTA Ignores Other Consequential Safety Issues

MTA ignores other consequential safety issues, including the following:

- MTA does not address the safety issues associated with LRT crossing Connecticut Avenue at-grade under the low investment LRT alternative.
- MTA does not address the safety issues associated with an at-grade crossing of the LRT tracks by a pedestrian path providing access to the trail in eastern Bethesda.
- MTA does not address the safety issues associated with the shared LRT/vehicle use of roads east of Silver Spring.

Mr. Reistrup addresses each of these issues in this Verified Statement. Reistrup V.S. at 9, 12, 16-17. MTA's failure to address these issues are just additional

¹⁷ MTA commonly cites the light-rail system in Portland, Oregon ("MAX") in discussing safety and security issues such as during the public hearing in November 2008. http://www.purplelinemd.com/images/stories/purpleline_documents/workshop_displays/nov_2008_hearings/08_lrt.pdf. But MAX has had serious safety and security problems for riders and pedestrians. TriMet, the Portland-based agency that oversees MAX, reportedly began increasing its security following a brutal beating of an elderly man in November 2007 at a light-rail station and other criminal activity on the station platforms. Portland Tribune, [TriMet Adds Cameras, Officers to MAX Security](http://www.portlandtribune.com/news/story.php?story_id=122271794625986400) (Sept. 29, 2008), available at http://www.portlandtribune.com/news/story.php?story_id=122271794625986400.

examples of MTA's abysmal failure to take a hard look at the life and death safety issues raised by its Purple Line proposals.¹⁸

IV.

MTA'S ANALYSIS OF HISTORIC PROPERTY ISSUES IS FUNDAMENTALLY FLAWED

MTA recognizes that CCC is a historically significant property. However, MTA's analysis under the governing historic property and federal transportation laws is fundamentally flawed because MTA has failed to make the legally required effort to identify the clear adverse effects five of the six the Purple Line build options will have on CCC's historic golf course and then to address these adverse effects in the manner called for under the law.

A. CCC is a Historically Significant Property

In 2002, the Maryland Historical Trust ("MHT") deemed CCC eligible for inclusion in the National Register of Historic Places ("NRHP") for both "association with local history" and "significant architecture and design."¹⁹ MTA's Architectural History Technical Report ("AHTR") concedes that CCC is a historic property, significant for its "association with the Chevy Chase community's marketing and development," and for the "clubhouse's architecture

¹⁸ MTA's cavalier approach to safety is further demonstrated by the fact that, while MTA prepared seventeen technical reports to accompany the AA/DEIS, MTA did not prepare a technical report on safety issues.

¹⁹ See Letter from Jonathan Sager, Maryland Historical Trust, to Janet Vine, U.S. Army Corp of Engineers (July 18, 2006).

and *golf course's landscape design*.”²⁰ The property's historic nature derives principally from the golf course, which is both nationally and locally significant due to its unique design and its role in the sport's development.

Founded in 1898, CCC moved to its current location on Connecticut Avenue in 1911. The property's primary distinguishing feature was – and remains to this day – the golf course. Walter J. Travis, one of golf's legendary course architects, was an early planner and designer of CCC.²¹ Key features of the course were conceived or improved upon by Travis prior to CCC's hosting of the 1921 United States Open Championship.²² CCC's course still exhibits the same basic course design and rating that it did in 1921.²³ In its first decade, CCC was also an early site of experimentation in the use of turf grass in golf courses.²⁴

Following the opening of its Connecticut Avenue site and throughout the 20th century, CCC has played an integral role in the development of the sport of golf. The course has hosted numerous national and local tournaments featuring many of the nation's and the area's finest golfers. CCC has also held numerous exhibition matches, including wartime benefits for the American Red Cross. Its golf program – “the source of much of [CCC's] local, regional, national, and at times, international renown” – has flourished due in large part to

²⁰ See AHTR 2-8 (emphasis added).

²¹ COLUMBIA COUNTRY CLUB: 100 YEARS OF SPIRITED HISTORY, 1898-1998 at 77-78 (2000) (hereinafter “COLUMBIA”).

²² Id.

²³ Id.

²⁴ Id.

the design strength of the course and the work of its many caretakers.²⁵ Historical highlights include:

- **1918** – World War I Benefit Tournament for the D.C. Red Cross
- **1921** – United States Open Championship
- **1925** – World Championship of Golf
- **1940** – Red Cross Benefit
- **1947, 1948, 1952** – National Celebrities Golf Tournaments for the Red Cross
- **1955** – International Golf Championship and Canada Cup
- **2003** – Junior United States Amateur Championship
- Numerous Middle Atlantic, Maryland, and D.C. area championship matches²⁶

Throughout this long history, CCC members and employees have taken special care to maintain the basic integrity of the course's original design. Although the course has undergone adjustments, including the installation of a sewage system and the moving of certain sand bunkers and tree lines, the routing of the original course has remained essentially unchanged. As it exists today, CCC's present course is "remarkably similar to the original layout, arguably making it the *oldest*

²⁵ *Id.* at 115.

²⁶ *Id.* at 77-115.

*course in the Washington area to occupy its original space and essentially retain its original layout.”*²⁷

CCC’s place in the history of golf is well-known and nationally recognized. There are over 17,000 golf courses in the United States. In 1995, the nation’s leading golf periodical, Golf Digest, honored six of these golf courses as “Historic Golf Landmark[s].” CCC was one of these six courses, which also included Pebble Beach Golf Links; Oakmont Country Club; The Country Club in Brookline, Massachusetts; National Golf Links of America; and Onwentsia Club. CCC was designated a Historic Golf Landmark because its golf course remained “substantially unchanged” for over 75 years, because it was “[t]he first American course remodeled specifically for a major [-] Walter Travis did it for the 1921 U.S. Open” and because it is a “museum piece[] of the game.”²⁸ CCC proudly displays a plaque commemorating its selection as a Historic Golf Landmark near the first tee.

B. CCC’s Historic Significance is Mishandled in the AA/DEIS

The MHT has deemed CCC eligible for inclusion in the NRHP. Under the National Historic Preservation Act (“NHPA”) Section 106, the head of an agency having direct or indirect jurisdiction over a federally assisted undertaking must take into account potential effects on “any district, site, building,

²⁷ Id. at 78 (emphasis added).

²⁸ See R. Whitten, “Landmark Decisions,” Golf Digest, May 1995 at 124-25; R. Whitten, “Six Places In the Course of History,” Golf Digest, Nov. 1995 at 24.

structure, or object” eligible for inclusion in the NRHP prior to the approval of federal funds.²⁹

In its AHTR, MTA concedes that CCC is a historic property, significant for both its “association with the Chevy Chase community’s marketing and development” and for the “clubhouse’s architecture and *golf course’s landscape design*.”³⁰ However, the report concludes that the area of the property that would be impacted by the Purple Line is “not historic,” and that the construction of the Purple Line along the Georgetown Branch alignment would require the displacement of only “one recently built, non-historic portion of the golf course, which was inadvertently located on MTA right-of-way.”³¹ The AHTR goes on to state that the “integrity of location, design, setting, materials, workmanship, feeling, or association for the historic portion of the property would not be diminished to a point that the historic character of the country club would be diminished.”³²

²⁹ 16 U.S.C.A. § 470(f) (2008).

³⁰ See AHTR 2-8 (emphasis added).

³¹ AHTR 2-8.

³² Id.

1. MTA's "Section 106" Assessment is Wrong

MTA's findings are wrong. If the Purple Line is constructed along the Georgetown Branch,³³ the Purple Line's adverse effects will extend well beyond the current Georgetown Branch trail alignment, including permanent alterations of CCC's historic golf course and its design. Indeed, the AA/DEIS concedes that five of the six of the Purple Line alternatives "would require altering the features" of the golf course, listing the following "require[d]" modifications:

- Relocation and reconstruction of two golf cart underpasses and a cart path;
- *Reconfiguration of golf course features* to remove them from the right of way;
- Raising and widening the rail bed;
- Constructing retaining walls and fencing along the right of way.³⁴

MTA thus acknowledges that construction of the Purple Line along the Georgetown Branch will require the substantial reconfiguration of the course. In addition to these acknowledged effects, construction of the Purple Line along the Georgetown Branch will 1) permanently and significantly damage portions of holes, and 2) aesthetically and audibly disturb nearly half the course.³⁵

³³ Five of the six Purple Line build alignments run along the Georgetown Branch right-of-way west of Connecticut Avenue through CCC. The low investment BRT alignment does not.

³⁴ AA/DEIS at 4-23-24 (emphasis added).

³⁵ See Reistrup V.S. at 5, 10-12.

Under the NHPA, an “adverse effect” is found when an undertaking “may *alter*, directly or indirectly, *any* of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.”³⁶ In evaluating the impacts of the Purple Line on CCC, relevant adverse effects include:

- *Physical destruction of or damage to all or part of the property;*
- *Alteration of the property;*
- *Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance;*
- *Introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features.*³⁷

All of these criteria are met by the alternatives proposed in the AA/DEIS that utilize the Georgetown Branch alignment west of Connecticut Avenue. As Mr. Reistrup explains in his Verified Statement, these Purple Line alternatives would create significant physical impacts to the course through the elimination of tee boxes and encroachment onto greens, permanently damaging the course.³⁸ The effects will be the most severe on the 15th, 17th, and 18th holes,

³⁶ 36 C.F.R. § 800.5(a)(1) (2008) (emphasis added).

³⁷ 36 C.F.R. § 800.5(a)(2) (2008).

³⁸ Reistrup V.S. at 10-11.

which would require significant alterations to greens and tee boxes.³⁹ Further, the Purple Line would disrupt the quiet, pastoral setting of the course through aesthetic and audible intrusions that will affect up to eight holes (1st, 2nd, 3rd, 14th, 15th, 16th, 17th, and 18th).⁴⁰ Finally, the cumulative effect of all of these changes would be to destroy the overall character and use of the golf course. Defacing part of the historic property irreparably injures the historic character of the whole property. CCC respectfully requests that the MTA properly account for these effects in its historic property assessment and consult with CCC accordingly.

CCC further emphasizes here that most of the portions of the golf course impacted by MTA's proposed Purple Line routings are not "recently built," as MTA claims. The key portions of the course that are impacted have been in place since the course was initially designed. CCC appends as a Counsel's Exhibit 1 a diagram of the course lay-out in 1921. This diagram demonstrates that the areas in question have always resided at the heart of the historic CCC golf course.

MTA's statements concerning the nature of the Georgetown Branch right-of-way are also incorrect. The Georgetown Branch rail line was built in the early 1900's as a single-line railroad track from Silver Spring through Chevy Chase and Bethesda to the Georgetown neighborhood in the District of Columbia. The Georgetown Branch right-of-way bisects CCC. It was designed for freight train use, but never was utilized much. For many years, the branch averaged one

³⁹ Id.

⁴⁰ Id.

train per day,⁴¹ and in the years prior to service discontinuance in the mid-1980's, approximately one train per week moved over the rail line.⁴² Running one short freight train per day, or one train per week, is substantially different than running high speed light rail trains that will speed through CCC every few minutes.

MTA's assertions that portions of the historic golf course were "inadvertently" placed on the Georgetown Branch right-of-way are also incorrect. The Georgetown Branch rail line was engineered for single-track use, and the owners of the rail right-of-way permitted CCC to use part of that right of way for golf course purposes.⁴³ For this reason, part of the historic golf course is located on the Georgetown Branch right-of-way. MTA's current plan to substantially expand the portion of the right-of-way used for rail purposes is a significant change from the historic shared-use of the right-of-way by the right-of-way owners and CCC.

⁴¹ See Herbert H. Harwood, Jr., Impossible Challenge, The Baltimore and Ohio Railroad in Maryland at 334 (1979) ("Normally the [Georgetown] branch was always a simple one-train-a-day operation, essentially no more than an extended switching run.").

⁴² See Application of the Baltimore and Ohio Railroad Company, Metropolitan Southern Railroad Company and Washington and Western Maryland Railway Company – Abandonment and Discontinuance of Service – In Montgomery County, MD and The District of Columbia at 4, (ICC Docket No. AB-19 (Sub-No. 112)) (Apr. 9, 1986).

⁴³ See Chevy Chase Land Co. v. United States, 37 Fed. Cl. 545, 589 (1997) (CCC used Georgetown Branch right-of-way with "permission of the [railroad] owner.").

2. MTA Has Not Met its Consulting Obligations

MTA has not fully complied with its obligations to consult with CCC during the AA/DEIS drafting process. CCC has a strong cultural and economic interest in the preservation of its golf course, and MTA has acknowledged CCC as a “consulting party” in the Section 106 process. As such, MTA is required to fully involve CCC in “findings and determinations” made during the process, and to plan consultations “appropriate to the scale of the undertaking and the scope of federal involvement.”⁴⁴

In the drafting of an AA/DEIS, an agency must consult with identified parties, where appropriate, during NEPA scoping, environmental analysis, and NEPA document preparation.⁴⁵ The agency must seek information from identified consulting parties and “identify issues relating to the undertaking’s potential effects on historic properties.”⁴⁶ In finding that an undertaking will affect historic properties, the agency must notify all consulting parties and invite their views on potential adverse effects.⁴⁷ After identifying adverse effects, the agency must engage with the state historic preservation officer and other consulting parties to “develop and evaluate alternatives or modifications to the

⁴⁴ 36 C.F.R. § 800.2(a)(4) (2008).

⁴⁵ *Id.* at § 800.8(c)(1)(iii).

⁴⁶ *Id.* at § 800.4(a)(3).

⁴⁷ *Id.* at § 800.4(d)(2).

undertaking that could *avoid, minimize, or mitigate* adverse effects on historic properties.”⁴⁸

The AA/DEIS states that MTA has previously invited consulting parties, including CCC, “to discuss impacts to historic resources and provide comments.”⁴⁹ According to the AA/DEIS MTA met with CCC in February 2003 and November 2004 regarding its Purple Line plans, and CCC expressed “concerns about the effect on their greens located within the County-owned right-of-way, and the need to maintain access for golfers and golf carts across the right-of-way.”⁵⁰ This statement mischaracterizes these discussions as addressing only the Georgetown Branch right-of-way impacts, rather than the project’s broader and inevitable effects, both in and out of the right-of-way, on the historic golf course’s layout, features, and setting. Indeed, the AA/DEIS makes clear that CCC and the MTA have vastly different conceptions of the ways in which the Purple Line will impact the property.

CCC believes that the MTA has thus far not accounted for those views in the legally required manner, and has apparently made a determination of the project’s potential effects based on these limited interactions in combination

⁴⁸ Id. at § 800.6(a) (emphasis added); see also id. at § 800.8(c)(1)(v).

⁴⁹ AA/DEIS at 4-25 col. 2.

⁵⁰ Id. at 4-24 (Table 4.4-2). See also Public Outreach and Coordination Technical Report (September 2008), available at http://www.purplelinemd.com/images/stories/purpleline_documents/deis/Public%20Outreach%20Tech%20Rpt%2009%202008.pdf.

with an initial “cultural resources sensitivity assessment.”⁵¹ In light of the magnitude of the Purple Line project, CCC requests that the MTA engage it in a level of consultation “appropriate to the scale of the undertaking” as required under Section 106.⁵²

3. MTA Must Include CCC in its Section 4(f) Analysis

According to MDOT, if a historical resource is considered nationally or locally significant, it must be granted protection under Department of Transportation Act of 1966 “Section 4(f).”⁵³ Under this statute, the Secretary of Transportation may approve a transportation project only if 1) there is “*no prudent and feasible alternative* to using that land,” and 2) the project “includes *all possible planning to minimize harm* to the ... historic site resulting from the use.”⁵⁴ This requirement is met if the Secretary determines that a project will have a “*de minimis* impact on the area.”⁵⁵ “Use” of a resource can be direct or constructive through either the operation or construction of a transportation project. The MTA’s Preliminary Section 4(f) Evaluation Technical Report further defines “constructive use” of a Section 4(f) resource as consisting of “impacts

⁵¹ AA/DEIS at 4-25 col. 4.

⁵² 36 C.F.R. § 800.2(a)(4) (2008).

⁵³ See MDOT Website http://www.sha.state.md.us/improvingourcommunity/oppe/4f/res_cult.asp; see also http://www.section4f.com/rel_statutes.htm. Section 4(f) is now codified at 49 U.S.C.A. § 303.

⁵⁴ 49 U.S.C.A. § 303(c) (2008) (emphasis added).

⁵⁵ Id. at § 303(d)(1)(A) (emphasis added).

which substantially impair the function, integrity, use, access, value or setting of the resource, *even though the project does not directly use the land.*⁵⁶

The AA/DEIS acknowledges that CCC is a significant “Section 4(f) historic resource” and directs the reader to its Preliminary Section 4(f) Technical Report “for further information on this resource.”⁵⁷ However, CCC is completely absent from this report. The AA/DEIS appears to conclude that the Inner Purple Line will not have any “adverse effect” on CCC’s historic features, and thus does not apply Section 4(f) to CCC as a significant historic resource or discuss the possibility of the Purple Line’s actual or constructive use of the property. However, as demonstrated above, the project build options that utilize the Georgetown Branch right-of-way would substantially impair the use of the historic golf course through the occupation of CCC land during operation and construction, as well as through the introduction of various long-term environmental, aesthetic, and noise-related disruptions. Thus, CCC is entitled to Section 4(f) protections.⁵⁸

⁵⁶ AA/DEIS Preliminary Section 4(f) Evaluation Technical Report at 4-1 (emphasis added).

⁵⁷ AA/DEIS at 4-23-24.

⁵⁸ Also, the main body of the AA/DEIS lists CCC as a “recreational area” and notes that the MTA “intends to pursue a finding of *de minimis* impact” for public parklands and recreational areas. AA/DEIS at 4-14 col. 4. However, the accompanying chart only addresses effects on public recreational areas. The implication seems to be that the MTA has *carte blanche* with respect to construction on the Georgetown Branch, while any impacts on the historic portions of CCC’s property would be *de minimis* and therefore legally acceptable.

MTA's failure to conduct a meaningful Section 4(f) analysis for the historic CCC golf course is unlawful. CCC's golf course is clearly a protected Section 4(f) historical resource; construction of the Purple Line through the course will substantially and fundamentally harm this historic resource; and, as discussed in Section VI below, there are clear "prudent and feasible alternative[s]" (*id.*) available to MTA to avoid these adverse impacts altogether.

C. This Mishandling is Confirmed by Montgomery County Planning Officials

On December 22, 2008, the staff of the Montgomery County Planning Department issued a detailed memorandum on the Purple Line. The staff concluded that construction of the Purple Line along the Georgetown Branch alignment could adversely impact the "historic portion of the course." The staff memorandum states in pertinent part:

The Columbia Country Club (M:35-140) has been determined eligible for the National Register of Historic Places. While staff is not concerned about removal of the nonhistoric portion of the country club golf course for the Purple Line project, staff is concerned that removal of this parcel might negatively impact the remaining historic portion of the course, due to adjustments that will have to be made to the historic setting due to this undertaking. Staff would want to work closely with the property owner to ameliorate any potential adverse effect.

MCPD Staff Memorandum, at Appendix C, Historic Preservation Section
Memorandum at 2-3.

As demonstrated above, the impacts on CCC's historic golf course would go well beyond the *de minimis* threshold.

V.

MTA'S ANALYSIS OF SOUND, VIBRATION AND VISIBILITY IMPACTS IS FUNDAMENTALLY FLAWED

MTA generally concludes in the AA/DEIS that construction and operation of the Purple Line will not cause significant sound, vibration and visibility impacts in the project area. However, as Mr. Thornhill explains, it is clear that introduction of the light rail along the Georgetown Branch right-of-way “will add more noise and vibration along this corridor than it has historically experienced as well as substantially altering the current park-like setting by removing the wooded canopy, expanding the rail footprint and adding new transit facilities (e.g., electric wires for light rail transit).” Thornhill V.S. at 7.

As Mr. Thornhill also explains, MTA’s technical analysis of sound, vibration and visual impact issues does not include the technical data and analyses that are necessary for the public to meaningfully comment on MTA’s conclusions:

Substantial data deficiencies make it impossible to verify the results and conclusions reached in the AA/DEIS and associated technical reports concerning noise, vibration and visual impacts. Additional information on the methods and procedures used to characterize these resources and assess the project’s impacts on them must be provided to permit the public a full and thorough review and verification of the AA/DEIS findings and conclusions.

Id. at 7.

VI.

MTA'S ANALYSIS OF PROJECT ALTERNATIVES IS FUNDAMENTALLY FLAWED

As discussed in Section I above, CCC believes that the public interest will best be served if the Purple Line is not built. CCC takes this position because it does not make good transportation policy to expend huge sums on a project that will not meaningfully reduce traffic congestion in the Purple Line area.

MTA's own data supports this conclusion. As Mr. Allen observes, data included in the AA/DEIS suggests that the State can better spend its transportation dollars by improving bus service to Metro Stations in the Purple Line corridor, rather than expending hundreds of millions, or billions, of dollars on the Purple Line:

The AA/DEIS estimates 68,100 daily boardings on the High LRT Purple Line, but only 36,100 linked trips. That is, there are really 36,100 *passengers*, 32,000 of whom (89%!) have to transfer to another transit line to complete their trip (36,100 passengers + 32,000 transfers = 68,100 boardings). This suggests that the Purple Line in fact does not serve cross-county travel demand so much as it functions to shuttle people to a Metrorail station, where they continue their radial trip towards or away from DC. This in turn suggests that a more effective alternative would have been series of improved short-haul feeder buses focused on each Metrorail station. The AA/DEIS does not report whether such a scenario was ever analyzed.

Allen V.S. at 11-12.

If MTA disagrees, CCC urges MTA to meet its legal obligations under governing law by choosing a Purple Line routing alternative that will not utilize the Georgetown Branch right-of-way west of Connecticut Avenue or by otherwise routing the Purple Line in a manner that will cause substantial adverse impacts on CCC.

CONCLUSION

CCC appreciates the opportunity to present these Comments on the AA/DEIS.

Respectfully submitted,



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Dated: January 13, 2009

BEFORE THE
FEDERAL TRANSIT ADMINISTRATION
US DEPARTMENT OF TRANSPORTATION
AND
MARYLAND TRANSIT ADMINISTRATION
MARYLAND DEPARTMENT OF TANSPORTATION

***IN THE MATTER OF THE ALTERNATIVES ANALYSIS/
DRAFT ENVIRONMENTAL IMPACT STATEMENT
RELATED TO THE PURPLE LINE***

Verified Statement
of
Thomas D. Crowley
President

L.E. Peabody & Associates, Inc.

On Behalf of
Columbia Country Club

January 2009

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LIST OF EXHIBITS

EXHIBIT

NO.

(1)

TITLE

(2)

1	Statement of Qualifications
2	Columbia Country Club's November 17, 2008 Request For Information From MTA
3	Columbia County Club's November 20, 2008 Request For Information Under the Maryland Public Information Act
4	MTA's December 22, 2008 Response to Columbia Country Club's November 17, 2008 Requests
5	Comments On MTA's Workpapers Request Responses
6	Restated Table 4-2 - - Annualization Factors
7	Restated Table 3-2: MTA Bus O&M Cost Model
8	Restated Table 3-3: MTA Light Rail O&M Cost Model
9	Restated Table 3-4: WMATA Bus O&M Cost Model
10	Restated Table 3-5: Montgomery County Bus O&M Cost Model
11	Comparison of Other LRT Projects To Purple Line Alternative Operating Costs

I. INTRODUCTION

My name is Thomas D. Crowley. I am an economist and President of L. E. Peabody & Associates, Inc., an economic consulting firm that specializes in solving economic, transportation, marketing, financial, accounting and fuel supply problems. I have spent most of my consulting career of over thirty-seven (37) years evaluating transportation operations, including costs, prices, financing, capacity and equipment planning issues. My assignments in these matters were commissioned by transportation companies, shippers, passenger organizations and government departments and agencies. A copy of my credentials is included as Exhibit No. 1 to this verified statement ("VS").

I have been asked by the Columbia Country Club ("CCC") to review the Maryland Transit Administration's ("MTA") estimates of the Purple Line operating and maintenance ("O&M") costs and capital costs as set forth in the Purple Line Alternatives Analysis/Draft Environmental Impact Statement ("AA/DEIS"), and in two technical reports accompanying the AA/DEIS, the "Operating and Maintenance Cost Estimate Technical Report" ("O&M Technical Report"), and the "Capital Cost Estimating Methodology Technical Report" ("Capital Cost Report").

Based upon this review, I have reached the following principle findings and conclusions. First, MTA has not provided sufficient data within the AA/DEIS and its technical reports that allows me, or any member of the public, to reconcile each proposed transit alternative's cost estimates or to test the accuracy of key O&M and capital cost assumptions. Second, MTA has refused to provide most of this missing data even though

CCC has requested MTA to provide it. Third, to the extent MTA has provided underlying study data, it shows in several financially consequential instances that MTA's calculations of O&M cost components and capital cost components are, or could be, substantially understated due to the use of understated cost indices and discount rates, and the miscalculation of unit costs. Fourth, MTA's current estimates of Purple Line O&M costs, which are most likely substantially understated, are low when measured against costs incurred in comparable projects that did get built.

The remainder of my statement is set forth under the following topical headings:

- II. MTA Has Provided Insufficient Data
- III. MTA's Understatement of Capital and O&M Unit Costs
- IV. Cost Comparisons to Other Transit Systems

II. MTA HAS PROVIDED INSUFFICIENT DATA

MTA states that it performed the AA/DEIS process to "... support local decision-making on the need for transit investments in the Purple Line corridor, as well as the type and scale of those investments."¹ MTA also states that the AA/DEIS serves as an Alternatives Analysis prepared for the Federal Transit Administration ("FTA") in accordance with Congressional mandates.² The FTA's Alternatives Analysis requirements for new transit projects are intended to allow for an objective, efficient and fully informed evaluation and rating of the transit projects seeking funding under the Federal New Starts process.³

To meet these twin goals of providing local decision making on the scope and scale of the Purple Line investments and of meeting FTA's mandate of performing a fully informed evaluation, MTA would need to provide sufficient data and information in its AA/DEIS to fully understand, reconcile and test its cost estimates and assumptions. MTA's AA/DEIS fails in this respect. The AA/DEIS, as currently presented, does not provide sufficient data that would allow any member of the public to reconcile MTA's O&M and capital cost estimates and/or to test the accuracy of many of the key O&M and capital cost assumptions.

¹ See AA/DEIS at Page P-1.

² Id.

³ The New Starts program is the federal government's primary financial resource for funding locally planned, implemented and operated transit capital projects.

**A. MTA DID NOT PROVIDE
SUFFICIENT DATA TO VERIFY
ITS O&M COST CALCULATIONS**

MTA calculates what it states are the “Incremental Annual Operating and Maintenance Costs” for each Purple Line build alternative the “no-build” transit alternative. As shown in the AA/DEIS’s O&M Technical Report at Table 4-5, estimated incremental O&M costs above the no-build alternative will range from \$14.6 million for the Transportation System Management Alternative (“TSM”) to \$26.4 million for the Low Investment Light Rail Transportation Alternative (“Low Investment LRT”).⁴ MTA provides sufficient detail with regards to its calculations of O&M unit costs in Tables 3-2 to 3-5 of the O&M Technical Report in order to verify and reconcile its development of unit costs.⁵ However, MTA does not provide any worksheets or schedules within the AA/DEIS showing how the calculated unit costs were applied to the expected operating statistics for each Purple Line alternative to develop each alternative’s total O&M cost.

In addition, MTA also does not provide the forecasted operating statistics for each alternative that underlies each alternative’s aggregate O&M costs. MTA states that Table 4-1 of the O&M Technical Report contains the required statistics, but in actuality the referenced table contains unrelated bus transit time data. Likewise, MTA states that Table 4-6 contains annual operating statistics for each alternative, but the figures shown are hourly statistics and not annual statistics. Based on the information provided by MTA in the AA/DEIS and accompanying reports, I am unable to fully reconcile or verify MTA’s incremental O&M cost calculations.

⁴ See O&M Technical Report at Page 4-4.

⁵ Id. At Pages 3-5 to 3-8.

In order for me, or any other member of the public, to be able to fully analyze the accuracy of MTA's O&M cost calculations, the missing O&M data, including detailed workpapers showing the build-up of the aggregate costs, must be produced. CCC has requested MTA to produce this missing data in it letters to MTA dated November 17, 2008 and November 20, 2008. I have included copies of these letters as Exhibit No. 2 and Exhibit No. 3, respectively, to this VS.

In a letter dated December 22, 2008, attached as Exhibit No.4 to this VS, MTA provided a written response to CCC's requests for the missing data. I have reviewed this letter and conclude, for the reasons set forth in detail in my Exhibit No. 5, that most of the missing O & M data CCC has requested remains un-produced and that, as a result, MTA is trying to prevent access to data the public needs to determine the accuracy of its O & M calculations.⁶

**B. MTA DID NOT PROVIDE
SUFFICIENT DATA TO VERIFY
ITS CAPITAL COST CALCULATIONS**

Just as with its calculation of O&M costs, MTA did not provide sufficient detail to reconcile and validate its capital cost calculations. The AA/DEIS's Capital Cost Report outlines the process in which MTA developed its capital cost estimates for each transit alternative. The Capital Cost Report does include the development of capital investment unit costs assertively used in the capital cost calculations, but fails to provide detailed schedules or workpapers showing the build-up of the total capital costs for each alternative.

⁶ I have not yet had the opportunity to review the information MTA said it would produce in its December 22, 2008 letter.

MTA provides in Appendix A of its Capital Cost Report its determination of capital investment unit costs used in calculating total investment in the different alternatives. However, MTA did not provide any detailed listing of the expected investment quantities for each alternative, nor did it show how the quantities were applied to the unit costs to develop total investment. The lack of any basic level of detail is surprising given FTA reporting requirements and available resources. The FTA requires the use of specific cost formulations in the development of capital costs for transit projects. These formulations are detailed in the FTA's publication "Standard Cost Categories ("SCC") for Capital Projects," which includes pre-formatted Excel spreadsheets for accounting for all capital costs.⁷ MTA makes several references to the SCC in its AA/DEIS, but fails to provide the FTA approved worksheets.

Based on the data provided to date, I am unable to completely verify or reconcile MTA's capital cost calculations. In order for me, or any other member of the public, to be able to fully analyze the accuracy of MTA's capital cost calculations, the missing capital cost data must be produced. As I stated above, CCC has requested MTA to produce this missing data in its letters attached as Exhibit Nos. 2 and 3 to this VS. In a letter dated December 22, 2008, attached as Exhibit No. 4 to this VS, MTA provided a written response to CCC's requests for the missing data. I have reviewed this letter and conclude, for the reasons set forth in detail in Exhibit No. 5 to this VS, that most of the missing capital cost data CCC has requested remains un-produced.

⁷ See the FTA's website at http://www.fta.dot.gov/planning/newstarts/planning_environment_2580.html for a description of the SCC process and to download the FTA's SCC preformatted Excel worksheets.

III. MTA'S UNDERSTATEMENT OF CAPITAL AND O&M UNIT COSTS

To the extent that MTA did provide information regarding its development of capital and O&M unit cost estimates and its cost estimating processes, it shows in several financially consequential instances that MTA's calculations are, or could be, substantially understated. The reasons for these understatements include, but are not limited to, the use of an improper discount rate to calculate annualized capital costs, the use of an inappropriate price index, misapplication of price indices and the miscalculation of O&M and capital unit costs.

A. MTA's DISCOUNT RATE IS UNDERSTATED

MTA describes at page 4-5 of its Capital Cost Report the process used by the FTA to develop annual capital carrying charges based on SCC category.⁸ FTA uses an "Annualization Factor" shown by MTA on page 4-5 of the Capital Cost Report that incorporates a discount rate and economic life to develop annual capital carrying charges by SCC category. Economic lives used in the Annualization Factor came from FTA worksheets. MTA used a 7 percent discount factor, stating that this is the FTA "prescribed" discount rate.⁹

A 7 percent discount rate is a standard discount rate used by Federal agencies when assessing benefit-cost analyses. However, when assessing the costs and benefits of

⁸ The FTA requires the evaluation of the cost effectiveness of each alternative proposed be expressed in annual terms. Since capital costs are estimated as a total expenditure of base-year dollars, an annual payment is computed that is equivalent to what is in reality a one-time expenditure of capital funds.

⁹ See Capital Cost Report at page 4-5.

new transit projects, the FTA requires a higher discount rate than the customary 7 percent rate. FTA's "Procedures and Technical Methods for Transit Project Planning" states that in developing alternative analyses for transit projects funded in part with Federal funds, a discount rate of 10 percent should be used.

For the evaluation of any project advanced for Federal funding, the traditional discount rate is 10 percent. Since this rate is used with costs expressed in constant dollars, it represents a rate of return net of inflation. A 10 percent return in this setting may appear somewhat higher than that commonly used in the private sector. This is done purposely to provide a margin of safety in computing the cost-effectiveness of publicly funded projects whose merits are based on forecasts of such difficult-to-predict measures as transit ridership, time savings, and operating costs.¹⁰

The use of a 7 percent discount factor rather than a 10 percent discount factor leads to a large understatement of annualized capital costs. For example, assuming an asset with a 25-year useful life and an original cost of \$1 million, the use of a 7 percent discount rate in the FTA's Annualization Factor produces an annual carrying charge of \$86,000. Using a 10 percent discount rate in the Annualization Factor, the annual carrying charge increases to \$110,000. This reflects a 28 percent increase in annual carrying costs for this asset.

Exhibit No. 6 to this VS restates the Capital Cost Report's Table 4-2 using a 10 percent discount rate in lieu of the 7 percent used by MTA. Because MTA failed to provide sufficiently detailed capital cost data in the AA/DEIS, I was unable to apply the corrected Annualization Factors shown in Exhibit No. 6 to MTA's capital cost estimates.

¹⁰ See http://www.fta.dot.gov/planning/newstarts/planning_environment_2576.html.

However, because the 7 percent discount rate understates Annualization Factors by between 14.2 and 30.0 percent¹¹, I can conclude that MTA's annualized capital cost are understated.

**B. MTA'S COST ESTIMATES
DO NOT INCLUDE ASSET
REPLACEMENT COSTS**

While MTA included funds to cover initial construction and installation of capital assets, it did not include any additional funds for the replacement of these assets after their useful life. The failure to include allocations for the replacement of assets understates the capital requirements needed to fund the different purple line alternatives.

**C. MTA MISAPPLIED
PRICE INDICES**

FTA guidelines require that alternatives be evaluated on a constant dollar basis. This requires the use of a price index to adjust historic and projected future costs to the base year price level used in the analysis. FTA does not require the use of any one specific price index in the evaluation of transit alternatives, only that the indices be "reasonable."¹² I believe, based on my experience, that MTA chose prices indices and methods that are not reasonable given the nature of the projects involved.

¹¹ The percentage understatements were developed by dividing the 7 percent annualization factor by the 10 percent annualization factor and subtracting one from the resultant quotient.

¹² See for example FTA's SCC Workbook at Tab "Inflation."

1. **MTA Understated The Price Index In Its O&M Cost Calculations**

MTA's O&M cost analysis assumes all costs are at September 2007 price levels.¹³

To adjust its cost estimates to September 2007 price levels, MTA relied upon Consumer Price Index ("CPI") data for the Washington-Baltimore area, DC-MD-VA-WV, as published by the Bureau of Labor Statistics ("BLS"). MTA's inflation indices, which it shows in Table 3-1 of the O&M Technical Report, equal 1.153, 1.120 and 1.077 for 2003, 2004 and 2005, respectively, with 2007 having an index value of 1.0.

There are two problems with MTA's approach. First, MTA's inflation indices do not match the inflation indices developed from CPI data currently produced by the BLS. Current CPI data indicates that MTA's inflation factors are understated, as is shown in Table 1 below.

Table 1 <u>Comparison of CPI Inflation Indices</u>			
<u>Year</u> ^{1/} (1)	<u>MTA CPI</u> <u>Index Factor</u> ^{2/} (2)	<u>Correct CPI</u> <u>Index Factor</u> ^{3/} (3)	<u>Percent MTA CPI</u> <u>Understated</u> ^{4/} (4)
1. 2003	1.153	1.159	0.5%
2. 2004	1.120	1.127	0.6%
3. 2005	1.077	1.083	0.6%

^{1/} From the year shown to September 2007 levels.
^{2/} O&M Technical Report Table 3-1
^{3/} BLS Series CUURA311SA0 accessed December 19, 2008.
^{4/} (Column (3) ÷ Column (2)) – 1 x 100.

As shown in Table 1 above, MTA's inflation indices are slightly lower than current CPI data indicates.

¹³ See O&M Technical Report at Page 3-2.

The second and more fundamental problem is that MTA used an improper estimate of inflation in prices associated with industrial construction projects such as the Purple Line alternatives. MTA used the CPI as its inflation factor, which measures changes in prices incurred by consumers for items including, but not limited to, food, housing, apparel, transportation, medical care, and recreation. Such an index is not likely reflective of the change in prices incurred related to goods and services used to operate and maintain a public transportation system. Instead, MTA should have used an index such as the Producer Price Index ("PPI") to reflect changes in price levels. The PPI measures the average change over time in the selling prices received by domestic producers for their output, and is more indicative of price changes for industrial goods and services used in public transportation.¹⁴

Table 2 below compares the change in indices based on the PPI to the changes in MTA's CPI based indices and the corrected CPI indices.

¹⁴ FTA's guidelines on Financial Analysis on Financial Planning For Transit state "There are significant differences between measures of general price inflation like the Consumer Price Index (CPI) and the measures of inflation that represent the "basket" of inputs used in transit operations or construction. The seriousness of these differences compound over time. To minimize these potential errors, the financial model should accurately reflect the mix of labor, materials, fuel/power, real estate, and equipment used to operate and construct transit systems." See http://www.fta.dot.gov/planning/newstarts/planning_environment_2426.html.

<u>Year</u> ^{3/} (1)	<u>MTA CPI Index Factor</u> ^{2/} (2)	<u>Correct CPI Index Factor</u> ^{3/} (3)	<u>PPI Index Factor</u> ^{4/} (4)	<u>Percent CPI Understated</u> ^{5/} (5)
1. 2003	1.153	1.159	1.256	8.9%
2. 2004	1.120	1.127	1.183	5.6%
3. 2005	1.077	1.083	1.102	2.3%

^{1/} From the year shown to September 2007 levels.
^{2/} O&M Technical Report Table 3-1.
^{3/} BLS Series CUURA311SA0 accessed December 19, 2008.
^{4/} BLS Series WPU00000000 accessed December 19, 2008.
^{5/} (Column (4) ÷ Column (2)) - 1 x 100.

As shown in Table 2 above, indices based on the PPI are significantly higher than those produced using the CPI, and the application would produce larger estimated costs.

The impact of using the CPI versus the PPI to adjust for historic inflation is to understate the unit costs used to estimate the O&M for the different alternatives by approximately 5.6 percent. Table 3 compares MTA's bus cost model unit costs developed using MTA's CPI indices to unit costs developed using the PPI to adjust the unit costs to September 2007 price levels.

Table 3 Impact Of CPI and PPI Inflation Indices On Unit Costs			
<u>Cost Attribute</u> (1)	<u>MTA Unit Costs With CPI Indices</u> ^{1/} (2)	<u>MTA Unit Costs With PPI Indices</u> ^{2/} (3)	<u>Percent PPI Exceeds CPI</u> ^{3/} (4)
1. Vehicle Hour	\$58.52	\$61.80	5.6%
2. Vehicle Miles	\$3.41	\$3.60	5.6%
3. Peak Vehicles	\$67,727	\$71,506	5.6%

^{1/} O&M Technical Report Page 3-3
^{2/} Exhibit No. 7.
^{3/} (Column (3) ÷ Column (2)) - 1 x 100. The percentage change is the same across the three unit cost calculations because the same weighting is applied to the CPI and PPI scenarios.

As shown in Table 3, using indices based on the CPI rather than the more appropriate PPI leads to an understatement in MTA's estimated O&M unit costs.

To correct for the use of understated indices, I have restated the O&M unit costs included in MTA's Tables 3-2 through 3-5 using the PPI indices shown in Table 2 above. The results of my restatement are included as Exhibit Nos. 7 through 10 of this VS.

2. MTA's Capital Cost Estimates Use Inconsistent Price Indices

In developing O&M costs, MTA indexed costs to September 2007 price levels by use of a CPI based index. On page 3-1 of its Capital Cost Report, MTA states that it inflated its capital costs estimates to Second Quarter 2007 price levels by the use of the PPI Heavy Construction and PPI Highway Construction indices.

While I agree that PPI indices should be used for the adjustment of capital project pricing, MTA was inconsistent with its application. BLS publishes monthly figures for each of the PPI indices used by MTA in its capital cost calculations, so MTA had the necessary BLS data to index costs to September 2007 price levels. Using Second Quarter

2007 price levels rather than September 2007 price levels understates its capital cost estimates relative to its O&M cost estimates, which were indexed to a different time period.

**D. MTA MISCALCULATED
O&M UNIT COSTS**

MTA developed O&M costs for the alternatives using what it terms a resource build-up approach. As explained by MTA, costs are computed by estimating the labor and materials needed to provide a given level-of-service, and then multiplying the resource quantities by unit costs of said labor and materials.¹⁵ MTA developed its unit costs primarily from reported operating statistics and O&M costs from similar transit agencies that operate within the Washington-Baltimore metropolitan area.

MTA's approach is generally consistent with FTA guidelines, but its execution of the approach was faulty. MTA's faults include miscalculated and understated unit costs, inconsistent calculations of O&M unit costs, and a biased cost validation process.

I. MTA Understated LRT Train-Hour Unit Costs

In developing its Light Rail Transit ("LRT") O&M cost model shown on page 3-6 of the O&M Technical Report, MTA relied upon data and statistics from the FTA's National Transit Database ("NTD"). I obtained the NTD data from the FTA's website to verify MTA's unit cost calculations, and found that MTA overstated its LRT 2003 train-hour statistics. MTA's LRT O&M cost model contained in Table 3-3 of the O&M Technical Report assumes that MTA accumulated 176,887 revenue train hours in 2003.

¹⁵ See O&M Technical Report at 3-1.

However, NTD data shows MTA actually incurred 108,105 revenue train hours in that year, or 39 percent less than assumed. Since revenue train hours are used as a divisor in developing O&M unit costs, overstating the number of hours leads to an understatement in the resulting unit costs. As shown in Exhibit No. 8, Line 55, Column (3) to this VS, the actual unit costs should equal \$194.22 per revenue train hour at September 2007 price levels when the proper number of revenue train hours and inflation index are used.¹⁶

The impact of the misstatement of revenue train hour unit costs may be extremely significant. MTA's LRT unit cost model shown on Page 3-6 of MTA's O&M Technical Report indicates that MTA revenue train hour attributable costs accounted for 48 percent of total O&M costs in 2003. If MTA's proposed Purple Line LRT alternatives produce operating statistics, i.e., revenue train hours, car-miles, peak vehicles and track miles, in the same relative proportion of MTA's existing LRT operations, MTA's LRT O&M operating costs could be understated by at least 23 percent, if not more, based on the inflation assumptions utilized.¹⁷

¹⁶ By comparison, Table 3-3 showed a cost of \$108.85 per revenue train hour for this component.

¹⁷ The 23 percent understatement was calculated by utilizing MTA's 2003 operating units shown in the MTA LRT O&M Cost Model contained in Table 3-3 of the O&M Technical Report and calculating total O&M costs using MTA's understated unit costs as shown in Table 3-3 and LRT unit costs corrected for the overstatement in 2003 revenue train hours. Using the 2003 operating units and MTA's unit costs at September 2007 price levels develops a total O&M cost of \$32.278 million. Using corrected unit costs at September 2007 price levels produces total O&M expenses of \$39.775 million, or a difference of 23 percent.

**2. MTA's Calculation of Montgomery
County Bus O&M Costs Is Inconsistent**

As shown in Tables 3-2 to 3-5 of its O&M Technical Report, MTA developed its O&M unit costs by assigning annual cost figures to different cost attribution categories. For example, MTA assumed all expenses related to "Vehicle Operations Labor" were directly attributable to the number of revenue vehicle hours operated. Likewise, MTA assumed "Vehicle Operations Materials and Supplies," "Vehicle Maintenance Labor," and "Vehicle Maintenance Materials and Supplies" were directly attributable to revenue vehicle miles.

MTA was consistent in its cost attributions in all cases, except for "Vehicle Operations Materials and Supplies" expenses in its Montgomery County Bus O&M calculations. For this calculation as shown in Table 3-5 of the O&M Technical Report, MTA assumed "Miscellaneous" expenses varied, not with revenue vehicle miles, but with the number of peak vehicles operated. This inconsistent application leads to an understatement in revenue vehicle mile unit costs, and an overstatement in peak vehicle unit costs. Exhibit No. 10 to this VS corrects this inconsistent costs attribution.

It is not possible to identify with the current information available the impact of this misstatement due to a lack of information regarding each alternative's operating statistics. If the relative distribution of vehicle hours, vehicle miles and number of peak vehicles for each Purple Line alternative is similar to the distribution of these operating statistics for the Montgomery County bus operations, then the impact is minimal. However, if the Purple Line alternatives have higher number of relative vehicle miles to peak number of vehicles than the current Montgomery County bus operations, then MTA's costs would be understated since MTA's cost model on page 3-8 of its O&M

Technical Report understates vehicle mile related costs. Likewise, if the Purple Line alternatives were more highly weighted towards peak number of vehicles than vehicle mile attributable costs, then MTA's costs would be understated. Whether the costs are overstated or understated can only be definitively known when more information is made available.

3. MTA Understated BRT Guideway and Station Costs

MTA discusses its estimation of Bus Rapid Transit ("BRT") guideway and station costs at page 3-11 of the O&M Technical Report.¹⁸ MTA relied upon NTD cost data from public transit agencies outside the Washington/Baltimore metropolitan area that operate BRT systems to develop estimated guideway and stations unit costs used in its BRT costing model.¹⁹ MTA displays the results of its analysis in Table 3-10 of its O&M Technical Report.

A primary failing of MTA's guideway and station cost calculations is it only included labor costs in its unit costs calculation, and excluded any materials and supplies related expenses related to guideway and station maintenance. Not accounting for maintenance related materials and supplies costs leads to an understatement in the total costs for each of the BRT alternatives proposed by MTA. Further analysis should develop the estimated guideway and station costs expected to be incurred by MTA in its BRT alternatives.

¹⁸ BRT is a broad term given to a variety of transportation systems that, through improvements to infrastructure, vehicles and scheduling, attempt to use buses to provide a service that is of a higher quality than an ordinary bus line. A main feature of a BRT system is having dedicated or exclusive bus lanes or "guideways" which operate separate from all other traffic modes.

¹⁹ Transit agencies in the Washington-Baltimore metropolitan area currently do not operate BRT systems similar to that analyzed in the AA/DEIS. This required MTA to use similar operations outside the metropolitan area to develop its BRT unit costs.

4. MTA's O&M Cost Validation Process Is Improper

MTA discusses at Page 3-4 of its O&M Technical Report the "validation" of its unit costs estimates. In general, MTA's validation process involved comparing historic years total O&M costs from the transit systems from which MTA developed its unit costs statistics to estimated O&M costs developed using the MTA derived O&M unit costs and historic operating statistics. MTA shows this process in Tables 3-6 to 3-9 on page 3-9 of the O&M Technical Report.

The problem with MTA's validation process is it uses the same data to calculate and to validate its unit cost estimates. For example, MTA uses 2003 through 2005 O&M cost and operating statistics to develop average O&M unit costs estimates. It then develops estimated total O&M costs for each year 2003 to 2005 by applying its unit costs to each year's operating statistics. The estimated total O&M costs are then compared against actual historic costs to "validate" the unit costs.

Using the same data to develop the O&M unit costs and to test the unit costs offers no sound basis for validation. This is because any bias in the historical data will be imparted to the unit cost calculations. Subsequently comparing the biased unit costs data back against the original biased data used to develop the unit costs provides no insight into the validity of the costs. The circularity will ensure the unit costs are deemed valid.

III. COST COMPARISONS TO OTHER TRANSIT SYSTEMS

As discussed above, MTA attempted to substantiate its O&M cost estimates by using a cost verification process that effectively compared unit costs against the data from which the unit costs were originally developed. The AA/DEIS offers no other indication that MTA attempted to verify any other of its O&M and capital cost estimates. Comparing or "benchmarking" cost estimates from a proposed operation against currently operating systems can be an extremely effective process for gauging the accuracy of cost estimates, and to identify potentially under or overstated costs early in the building process.

To assess the reasonableness of MTA's O&M cost calculations, I compared MTA's estimates of annual normalized O&M costs for its LRT alternatives to normalized O&M costs for currently operating LRT systems.²⁰ My analysis shows that MTA's projections of Purple Line O&M costs are low when measured against costs incurred on comparable projects that have been built and are currently operating.

Table 4 below compares the projected O&M costs per weekday passenger for each Purple Line LRT alternative to the mean and median O&M cost per weekday passenger for ten currently operating LRT systems around the United States.²¹

²⁰ There is less comparable data for BRT systems when compared to LRT systems. Therefore, I restricted my analysis to comparisons of LRT systems at this time.

²¹ The cities included in the comparison include Dallas, TX, New Orleans, LA, Buffalo, NY, Minneapolis, MN, Charlotte, NC, Philadelphia, PA, San Diego, CA, Denver, CO, Houston, TX and Boston, MA.

Table 4 Comparison of Purple Line Alternative O&M Costs Per Passenger To Other LRT Systems O&M Costs Per Passenger	
<u>LRT System</u> (1)	<u>O&M Cost Per Weekday Passenger</u> ^{1/} (2)
<u>Comparison Group</u>	
1. Mean	\$2.76
2. Median	\$2.62
<u>Purple Line Alternatives</u>	
3. Low Investment LRT	\$1.71
4. Medium Investment LRT	\$1.54
5. High Investment LRT	\$1.29
^{1/} Source: Exhibit No. 11.	

As Table 4 above shows, MTA's estimates of each Purple Line alternative's O&M costs per weekday passenger is well below both the mean and median costs of 10 currently operating LRT systems. Moreover, as shown in Exhibit No. 11 to this VS, MTA's estimated costs are lower than 8 of the 10 systems included in the comparison group. These cost comparison data to other currently operating systems support the premise that MTA has understated the costs to operate and maintain its Purple Line LRT alternatives.

VERIFICATION

STATE OF VIRGINIA)

)

ss:

CITY OF ALEXANDRIA)

)

I, Thomas D. Crowley, verify that I have read the foregoing Statement, know the contents thereof, and that the same are true as stated to the best of my knowledge, information and belief.

Thomas D. Crowley

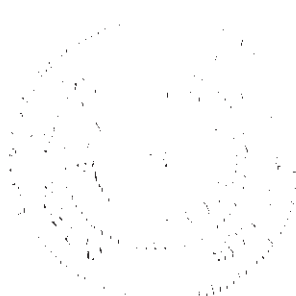
Subscribed and Sworn to before me

this 9 day of January, 2009.

Diane R. Kavounis
Notary Public DIANE R. KAVOUNIS

My Commission expires: November 30, 2012

NOTARY REGISTRATION # 7160645



STATEMENT OF QUALIFICATIONS

My name is Thomas D. Crowley. I am an economist and President of the economic consulting firm of L. E. Peabody & Associates, Inc. The firm's offices are located at 1501 Duke Street, Suite 200, Alexandria, Virginia 22314, and 10445 N. Oracle Road, Suite 151, Tucson, Arizona 85737.

I am a graduate of the University of Maine from which I obtained a Bachelor of Science degree in Economics. I have also taken graduate courses in transportation at George Washington University in Washington, D.C. I spent three years in the United States Army and since February 1971 have been employed by L. E. Peabody & Associates, Inc.

I am a member of the American Economic Association, the Transportation Research Forum, and the American Railway Engineering and Maintenance-of-Way Association.

The firm of L. E. Peabody & Associates, Inc. specializes in analyzing matters related to the rail transportation. As a result of my extensive economic consulting practice since 1971 and my participating in maximum-rate, rail merger, service disputes and rule-making proceedings before various government and private governing bodies, I have become thoroughly familiar with the rail carriers in the United States. This familiarity extends to subjects of railroad service, costs and profitability, railroad capacity, railroad traffic prioritization and the structure and operation of the various contracts and tariffs that historically have governed the movement of commodities by rail.

STATEMENT OF QUALIFICATIONS

As an economic consultant, I have organized and directed economic studies and prepared reports for railroads, freight forwarders and other carriers, for shippers, for associations and for state governments and other public bodies dealing with transportation and related economic problems. Examples of studies I have participated in include organizing and directing traffic, operational and cost analyses in connection with multiple car movements, unit train operations for coal and other commodities, freight forwarder facilities, TOFC/COFC rail facilities, divisions of through rail rates, operating commuter passenger service, and other studies dealing with markets and the transportation by different modes of various commodities from both eastern and western origins to various destinations in the United States. The nature of these studies enabled me to become familiar with the operating practices and accounting procedures utilized by railroads in the normal course of business.

Additionally, I have inspected and studied both railroad terminal and line-haul facilities used in handling various commodities. These operational reviews and studies were used as a basis for the determination of the traffic and operating characteristics for specific movements of coal and numerous other commodities handled by rail.

I have been involved in rail passenger transportation and commuter rail service for the past four decades. I have conducted numerous cost and operational studies of commuter operations, and have been involved in the evolution of rail passenger service

STATEMENT OF QUALIFICATIONS

costing methodologies. I have assisted passenger agencies in federal and state rule-making proceedings which established guidelines for determining commuter service costs.

I have assisted commuter agencies in preparing Facilities Utilization Plans, Manpower Utilization Plans, and Force Re-deployment Analyses that are basic building blocks to determine the cost of providing rail passenger service. I have developed detailed costing procedures which utilize specific railroad accounting systems. These cost analyses have assisted with the determination of the attribution of costs to specific casual factors as well as the allocation of costs between freight and passenger services. I have been involved in passenger revenue and ridership issues as well as liability and risk management for commuter agencies.

I have developed property and business valuations of privately held freight and passenger railroads for use in regulatory, litigation and commercial settings. These valuation assignments required me to develop company and/or industry specific costs of debt, preferred equity and common equity, as well as target and actual capital structures. I am also well acquainted with and have used the commonly accepted models for determining a company's cost of common equity, including the Discounted Cash Flow Model ("DCF"), Capital Asset Pricing Model ("CAPM"), and the Farma-French Three Factor Model.

STATEMENT OF QUALIFICATIONS

Moreover, I have developed numerous variable cost calculations utilizing the various formulas employed by the Interstate Commerce Commission ("ICC") and the Surface Transportation Board ("STB") for the development of variable costs for common carriers, with particular emphasis on the basis and use of the Uniform Railroad Costing System ("URCS") and its predecessor, Rail Form A. I have utilized URCS/Rail form A costing principles since the beginning of my career with L. E. Peabody & Associates Inc. in 1971.

I have frequently presented both oral and written testimony before the ICC, STB, Federal Energy Regulatory Commission, Railroad Accounting Principles Board, Postal Rate Commission and numerous state regulatory commissions, federal courts and state courts. This testimony was generally related to the development of variable cost of service calculations, rail traffic and operating patterns, fuel supply economics, contract interpretations, economic principles concerning the maximum level of rates, implementation of maximum rate principles, and calculation of reparations or damages, including interest. I presented testimony before the Congress of the United States, Committee on Transportation and Infrastructure on the status of rail competition in the western United States. I have also presented expert testimony in a number of court and arbitration proceedings concerning the level of rates, rate adjustment procedures, service, capacity, costing, rail operating procedures and other economic components of specific contracts.

STATEMENT OF QUALIFICATIONS

I have participated in various proceedings involved with the division of through rail rates. For example, I participated in ICC Docket No. 35585, Akron, Canton & Youngstown Railroad Company, et al. v. Aberdeen and Rockfish Railroad Company, et al. which was a complaint filed by the northern and mid-western rail lines to change the primary north-south divisions. I was personally involved in all traffic, operating and cost aspects of this proceeding on behalf of the northern and mid-western rail lines. I was the lead witness on behalf of the Long Island Rail Road in ICC Docket No. 36874, Notice of Intent to File Division Complaint by the Long Island Rail Road Company.

Columbia Country Club
Cherry Chase, Maryland 20815

November 17, 2008

VIA EMAIL AND OVERNIGHT DELIVERY

Mr. Michael D. Madden
Project Manager, Office of Planning
Maryland Transit Authority
6 St. Paul Street
Baltimore, MD 21202

Re: Purple Line

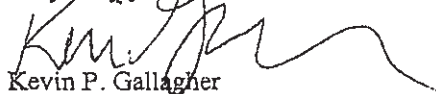
Dear Mr. Madden:

Columbia Country Club requests that MTA provide to us the information identified in the attachment to this letter. The requested information consists of specified factual and technical material MTA utilized in developing the Purple Line Alternatives Analysis/Draft Environmental Impact Statement ("AA/DEIS"). Disclosure of the information is necessary for us, or any other member of the public, to meaningfully review, and comment upon, MTA's analysis of the Purple Line's costs and asserted user benefits.

We will be happy to visit with you to facilitate prompt release of the requested information in an efficient manner. We emphasize that we are seeking only copies of existing materials and records, many of which are in electronic format. Timely receipt of this information is essential in light of the January 14, 2009 deadline for submitting written comments on the AA/DEIS.

We assume that MTA will provide the requested information without the need for the Club to submit a formal request under governing public records laws, but we are prepared to make such a request if that becomes necessary. I will call to follow-up with you.

Very truly yours,


Kevin P. Gallagher
Club Counsel

Attachment

A. Operating and Maintenance Cost Estimates

1. Please provide the estimated number of revenue vehicle hours, scheduled revenue vehicle miles and peak number of vehicles for each alternative used to develop the annual incremental operating and maintenance ("O&M") expenses shown in Tables 4-7 and 4-8 of the "Operating and Maintenance Cost Estimate Technical Report" ("O&M Technical Report").
2. Please provide the one-way track miles for each Bus Rapid Transit ("BRT") and Light Rail Transit ("LRT") used to develop the annual incremental O&M expenses shown in Tables 4-7 and 4-8 of the O&M Technical Report.
3. Please provide a corrected version of Table 4-1 of the O&M Technical Report.
4. Please provide the electronic workpapers in spreadsheet formats that detail the development of the annual incremental O&M expenses included in Tables 4-7 and 4-8 of the O&M Technical Report.
5. Please explain the link, if any, between the statistics shown in Table 4-6 of the O&M Technical Report to the statistics used to develop the annual incremental O&M Expenses in the same report.
6. Please provide the electronic workpapers in spreadsheet formats that detail the annual change in Systemwide Farebox Revenues included in table 5-2 of the Purple Line Alternatives Analysis Draft Environmental Impact Statement ("DEIS").

B. Capital Cost Estimates

7. Please provide in a spreadsheet format the Unit Cost Library ("UCL") included in Appendix A to the Capital Cost Estimating Methodology Technical Report ("Capital Cost Report").
8. Please provide an electronic copy of the cost information database used to develop the capital costs for each alternative as described in Sections 4.2.3 and 4.2.4 of the Capital Cost Report, including all links to the UCL and links to any separate databases which contain the quantity and units for each transit alternative.
9. Please provide electronic copies of the Federal Transit Authority ("FTA") Standard Cost Category ("SCC") Excel worksheets used to develop the cash flow projections for each alternative as described in Section 4.2.5 of the Capital Cost Report.
10. Please provide the electronic workpapers used to develop the capital cost estimates shown in Table 6-1 of the Capital Cost Report.

Columbia Country Club
Cherry Chase, Maryland 20815

November 20, 2008

Mr. John D. Porcari
Secretary of Transportation
Department of Transportation
P.O. Box 548
7201 Corporate Center Drive
Hanover, MD 21076

Dear Mr. Porcari:

This is a request under the Maryland Public Information Act, State Government Article §§ 10-611 to 628, on behalf of my client, Columbia Country Club. I wish to inspect all records in your custody and control pertaining to the items listed on the attachment to this letter.

The requested information consists of specified factual and technical material MTA utilized in developing the Purple Line Alternatives Analysis/Draft Environmental Impact Statement ("AA/DEIS"). Disclosure of the information is necessary for us, or any other member of the public, to meaningfully review, and comment upon, MTA's analysis of the Purple Line's costs and alleged user benefits.

We are willing to meet with you to facilitate prompt release of the requested information in an efficient manner. We emphasize that we are seeking only copies of existing materials and records, many of which are in electronic format. Timely receipt of this information is essential in light of the January 14, 2009 deadline for submitting written comments on the AA/DEIS.

If all or any part of this request is denied, please provide a written statement of the grounds for the denial. If you determine that some portions of the requested records are exempt from disclosure, please provide me with the portions that can be disclosed.

November 20, 2008
Page 2 of 2

I request copies of some or all of the records sought. Therefore, I request that you waive imposition of costs. If not, please advise me as to the cost, if any, for obtaining a copy of the records and the total cost, if any, for all the records described above. If you have adopted a fee schedule for obtaining copies of records and other rules or regulations implementing the Act, please send me a copy.

I look forward to receiving disclosable records promptly and, in any event, to a decision about all of the requested records within 30 days. Thank you for your cooperation. If you have any questions regarding this request, please telephone me at the above number.

Sincerely,



Kevin P. Gallagher

Attachment

cc: Denise Ferguson, Esquire
Principal Counsel
Department of Transportation
7201 Corporate Center Drive
Hanover, MD 21076

Mr. Paul J. Wiedefeld
Maryland Transit Administration
P. O. Box 548
7201 Corporate Center Drive
Hanover, MD 21076

Mr. Michael D. Madden
Project Manager
Office of Planning
Maryland Transit Authority
6 St. Paul Street
Baltimore, MD 21202

11. Please provide the electronic workpapers used to calculate the Annualized Capital Costs shown in Table 6-3 of the DEIS.

C. User Benefits

12. Please provide the electronic workpapers used to develop the Annualized Cost Per Hour of Unit Benefits shown in Tables 6-2 and 6-3 of the DEIS.
13. Please provide the electronic workpapers used to develop the Annualized Cost Per New Rider Relative to the No Build Alternative shown in Table 6-2 of the DEIS.

D. Travel Demand Forecasting Technical Report

14. Please provide the AECOM Transit original mode choice calibration report, including all mode choice coefficient values.
15. To the extent that the MTA recalibrated the MWCOG/AECOM Transit model, please provide the calibration report, including all mode choice coefficient values.
16. Please provide the model script files, all necessary input files, and all necessary supplemental programs to replicate the model run that represents the final calibration scenario of the mode choice model for this project. That is, the calibration run of the model immediately prior to its use in this study.
17. Please provide the electronic workpapers used to develop the estimate of transit link speed for each alternative described in Section 2 of the Travel Demand Forecasting Technical Report.
18. Please provide all workpapers supporting the figures shown in Table 3-58 ("Non-Included Attributes") in the Travel Demand Forecasting Technical Report.
19. For each alternative described in Section 2 of the Travel Demand Forecasting Technical Report, please provide the following AECOM Transit model input files:
 - a) Zonal walk times and percent walk to transit;
 - b) Highway networks and transit line files;
 - c) MWCOG station files;
 - d) Sidewalk links;
 - e) PnR links;
 - f) Transit station connector links; and
 - g) Any other special links.



MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION

Martin O'Malley, Governor • Anthony G. Brown, Lt. Governor
John D. Porcari, Secretary • Paul J. Wiedefeld, Administrator

December 22, 2008

Kevin P. Gallagher, Esq.
Columbia Country Club
Chevy Chase, MD 21815

Re: Public Information Act Request
AA/DIES Related Documents

Dear Mr. Gallagher:

I am in receipt of your Public Information Act ("PIA") request letter dated November 17, 2008. Your request is granted in part and denied in part. See below for the specific breakdown.

1. Please provide the estimated number of revenue vehicles, scheduled revenue miles and peak number of vehicles for each alternative used to develop the annual incremental operating and maintenance ("O&M") expenses shown in Tables 4-7 and 4-8 of the "Operating and Maintenance Cost Estimate Technical Report" ("O&M Technical Report"). **Your request is granted. This information is shown in Table 4-6 of the Operating and Maintenance Cost Estimate Technical Report, dated September 2008. (1 page)**
2. Please provide the one-way track miles for each Bus Rapid Transit ("BRT") and Light Rail Transit ("LRT") used to develop the annual incremental O&M Technical Report. **Your request is granted. This information is shown in Table 4-6 of the Operating and Maintenance Cost Estimate Technical Report, dated September 2008. (1 page)**
3. Please provide a corrected version of Table 4-1 of the O&M Technical Report. **Table 4-1 of the O & M Technical Report is the current one. (1 page)**
4. Please provide the electronic workpapers in spreadsheet formats that detail the development of the annual incremental O & M expenses included in Tables 4-7 and 4-8 of the O & M Technical Report. **Your request is both granted and denied. All the information necessary to replicate the operating and maintenance costs is available in the Operating and Maintenance Cost Technical Report, which will be provided. The spreadsheets used are a propriety tool of a private entity, that was developed independent of contract with the MTA, thus the request is denied pursuant to State Gov't Art., § 10-617(d). (16 pages)**
5. Please explain the link, if any, between the statistics shown in Table 4-6 of the O&M Technical Report to the statistics used to develop the annual incremental O&M Expenses in the same report. **The PIA does not contemplate answering questions, however, see Section 3 of the Technical Report. (1 page)**

6. Please provide the electronic workpapers in spreadsheet formats that detail the annual change in Systemwide Farebox Revenues included in table 5-2 of the Purple Line Alternatives Analysis Draft Environmental Impact Statement ("DEIS"). **Your request is granted, however, it is being provided as printed documents, not electronically. (5 pages)**
7. Please provide in a spreadsheet format the Unit Cost Library ("UCL") included in Appendix A to the Capital Cost Estimating Methodology Technical Report ("Capital Cost Report"). **Your request is denied, as the PIA does not contemplate creating documents, however, the electronic copy of the Unit Cost Library is included in Appendix A of the Capital Cost Estimating Methodology Report and shows all input values both unit cost and quantities that were used to develop each alternative cost estimate for the Purple Line AA/DEIS report.**
8. Please provide an electronic copy of the cost information database used to develop the capital costs for each alternative as described in Sections 4.2.3 and 4.2.4 of the Capital Cost Report, including all links to the UCL and links to any separate databases which contain the quantity and units for each transit alternative. **Your request is both granted and denied. A print copy of all estimate back-up sheets will be provided. The spreadsheets used are a propriety tool of PB, that was developed independent of contract with the MTA, thus the request is denied pursuant to State Gov't Art., § 10-617(d). (148 pages)**
9. Please provide electronic copies of the Federal Transit Authority ("FTA") Standard Cost Category ("SCC") excel worksheets used to develop the cash flow projections for each alternative as described in Section 4.2.5 of the Capital Cost Report. **Your request is both granted and denied. There are no such work sheets as described, thus your request is denied. That notwithstanding, a blank copy of the FTA SCC workbook will be provided free of charge.**
10. Please provide the electronic workpapers used to develop the capital cost estimates shown in Table 6-1 of the Capital Cost Report. **Your request is both granted and denied. A print copy of all estimate back-up sheets will be provided. The spreadsheets used are a propriety tool of a private entity, that was developed independent of contract with the MTA, thus the request is denied pursuant to State Gov't Art., § 10-617(d). (148 pages)**
11. Please provide the electronic work papers used to calculate the Annualized Capital Costs shown in Table 6-3 of the DEIS. **Your request is granted, however, it is being provided as printed documents, not electronically. (1 page)**
12. Please provide the electronic workpapers used to develop the Annualized Cost Per Hour of Unit Benefits shown in Tables 6-2 and 6-3 of the DEIS. **Your request is granted, however, it is being provided as printed documents, not electronically. (1 page)**
13. Please provide the electronic workpapers used to develop the Annualized Cost Per New Rider Relative to the No Build Alternative shown in Table 6-2 of the DEIS. **Your request is granted, however, it is being provided as printed documents, not electronically. (1 page)**
14. Please provide the AECOM Transit original mode choice calibration report, including all mode choice coefficient values. **Your request is granted. (8 pages)**
15. To the extent that the MTA recalibrated the MWCOC/AECOM Transit model, please provide the calibration report, including all mode choice coefficient values. **This request**

is granted in part. No calibration report exists. Calibration coefficient values will be provided. (2 pages)

16. Please provide the model script files, all necessary input files, and all necessary supplemental programs to replicate the model run that represents the final calibration scenario of the model for this project. That is, the calibration run of the model immediately prior to its use in this study. **This request is denied, as proprietary, pursuant to State Gov't Art., § 10-617(d). This model was developed independent of contract with the MTA.**
17. Please provide the electronic workpapers used to develop the estimate of transit link speed for each alternative described in Section 2 of the Travel Demand Forecasting Technical Report. **Your request is granted, however in printed format. The information to compute the speeds and the results are provided in Tables 18, 23, 29, 36, 43, 50 and 57 in the Travel Demand Forecasting Technical Report, August 2008. (4 pages)**
18. Please provide all workpapers supporting the figures shown in Table 3-58 ("Non-Included Attributes") in the Travel Demand Forecasting Technical Report. **Your request is granted. (1 page)**
19. For each alternative described in Section 2 of the Travel Demand Forecasting Technical Report, please provide the following AECOM Transit model input files: a) Zonal work times and percent walk to transit; b) Highway networks and transit line files; c) MWCOC station files; d) Sidewalk links; e) PnR links; f) Transit station connector links; and g) Any other special links. **This request is denied because no document exists responsive to this request.**

This agency charges a fee of \$0.25 per page for copies. MTA is producing 189 pages at a total cost of \$47.25. Please forward a check in the amount of \$47.25 made payable to the Maryland Transit Administration to: Stacey Freedman, Office Manager, Maryland Transit Administration, Office of the Attorney General, 6 St. Paul St., 12th Floor, Baltimore, Maryland 21202. As soon as Ms. Freedman receives the check, the documents will be released. The page count in parenthesis for each request total more than 189. This is due to the fact that some documents are responsive to more than one request.

Pursuant to § 10-622 of the State Government Article, you are entitled to an administrative review with this agency upon request. If requested such review will be conducted in accordance with State Government Article §§ 10-205 to 10-221 and hearing regulations of the Maryland Department of Transportation published at COMAR 11.01.13.11 and 11.01.14.01 through .14. You may also pursue judicial enforcement remedies under § 10-623 of the State Government Article.

Sincerely,



Michael Madden, Chief
Project Development-Office of Planning

Comments On MTA's Workpaper Request Responses

A. Operating and Maintenance Cost Estimates

1. CCC Request No. 1

Please provide the estimated number of revenue vehicle hours, scheduled revenue vehicle miles and peak number of vehicles for each alternative used to develop the annual incremental operating and maintenance ("O&M") expenses shown in Tables 4-7 and 4-8 of the "Operating and Maintenance Cost Estimate Technical Report" ("O&M Technical Report").

MTA Response

Your request is granted. This information is shown in Table 4-6 of the Operating and Maintenance Cost Technical Report, dated September 2008. (1 Page)

Comments On MTA Response

The data shown in Table 4-6 are not annual figures and are insufficient to calculate the annual incremental O&M expenses without further explanation or the use of wide-ranging assumptions. The title of Table 4-6 is "Annual Operating Statistics by Alternative and Mode," yet the figures included in the table are clearly not annual statistics based on their values. For example, under the Alternative No. 3 statistics for the Low Investment BRT alternative, MTA shows the number of Peak Hours as 37 and Revenue Vehicle Miles as 319. Similar relatively small figures are shown for each of the other alternatives. These are clearly not annual statistics as labeled by MTA, and MTA supplies no conversion factors or formulas for their conversion to annual statistics for their application to the calculated unit costs.

2. CCC Request No. 2

Please provide the one-way track miles for each Bus Rapid Transit ("BRT") and Light Rail Transit ("LRT") used to develop the annual incremental O&M expenses shown in Tables 4-7 and 4-8 of the O&M Technical Report.

MTA Response

Your request is granted. This information is shown in Table 4-6 of the Operating and Maintenance Cost Technical Report, dated September 2008. (1 Page)

Comments On MTA's Workpaper Request Responses**Comments On MTA Response**

Table 4-6 does show "One-Way Guideway Miles," but these miles are inconsistent with the route miles shown elsewhere in the AA/DEIS. Table 5-1 of the AA/DEIS shows the length of the system ranging from 16.2 to 16.9 miles, depending upon the alternative. These are different than the figures shown in Table 4-6, which range from 0 to 15.5

3. CCC Request No. 3

Please provide a corrected version of Table 4-1 of the O&M Technical Report.

MTA Response

Table 4-1 of the O&M Technical Report is the current one. (1 page)

Comments On MTA Response

Page 4-1 of the O&M Report states the following regarding Table 4-1:

The estimate of costs for each alternative was determined by multiplying the unit costs by the number of vehicles, hours, and miles of service estimated for each alternative and the one way track miles for BRT and LRT alternatives. The fully burdened cost comes from adding together the costs generated by these factors and the factors for BRT or LRT guideway. Table 4-1 shows these operating statistics for each alternative.

MTA's explanation indicates that the data in Table 4-1 should show the "number of vehicles, hours, and miles of service estimated for each alternative..." yet Table 4-1 is labeled "TSM Bus Headways (minutes)" and contains what appears to be origin-destination headway times. Table 4-1 contains no information on the number of vehicles, hours or miles of service, nor does it discuss each transit alternative. Table 4-1 may be a partial input to the cost model, but there is no clear explanation of its use, or link to the other operating statistics cited in the report.

Comments On MTA's Workpaper Request Responses

4. CCC Request No. 4

Please provide the electronic workpapers in spreadsheet formats that detail the development of the annual incremental O&M expenses included in Tables 4-7 and 4-8 of the O&M Technical Report.

MTA Response

Your request is both granted and denied. All the information necessary to replicate the operating and maintenance costs is available in the Operating and Maintenance Technical Report, which will be provided. The spreadsheets used are a proprietary tool of a private entity, that was developed independent of contract with MTA, thus the request is denied pursuant to State Gov't Art., §10-617 (d). (16 pages)

Comments On MTA Response

As indicated in Comments 1 to 3 above, the data included in the O&M Technical Report is insufficient to develop the annual costs without further correction, explanation and clarification. Additionally, by not providing the spreadsheets, which detail MTA's calculations and show underlying assumptions used to construct the spreadsheets, MTA is hiding the true methodology it used to develop the O&M costs.

5. CCC Request No. 5

Please explain the link, if any, between the statistics shown in Table 4-6 of the O&M Technical Report to the statistics used to develop the annual incremental O&M Expenses in the same report.

MTA Response

The PIA does not contemplate answering questions, however, see Section 3 of the Technical Report

Comments On MTA Response

Section 3 of the O&M Technical Report discusses only in broad terms the costing methodology used to develop each Purple Line alternative's O&M costs, and does not directly link the unit costs of the O&M Technical Report to the Table 4-6 statistics or to the annual O&M costs developed by MTA.

Comments On MTA's Workpaper Request Responses

6. CCC Request No. 6

Please provide the electronic workpapers in spreadsheet formats that detail the annual change in Systemwide Farebox Revenues included in table 5-2 of the Purple Line Alternatives Analysis Draft Environmental Impact Statement ("DEIS").

MTA Response

Your request is granted, however, it is being provided as printed documents, not electronically. (5 pages)

Comments On MTA Response

Printed documents may or may not provide the information necessary to fully evaluate the change in Farebox Revenues depending upon the detail provided. For example, a printed copy of the worksheet may not indicate how a particular figure is calculated, leaving one to guess as to the inputs used. The value of providing the electronic workpapers in a spreadsheet format lies in the ability to trace and audit each individual calculation, and to observe any underlying calculations.

B. Capital Cost Estimates

7. CCC Request No. 7

Please provide in a spreadsheet format the Unit Cost Library ("UCL") included in Appendix A to the Capital Cost Estimating Methodology Technical Report ("Capital Cost Report").

MTA Response

Your request is denied, as the PIA does not contemplate creating documents, however, the electronic copy of the Unit Cost Library is included in Appendix A of the Capital Cost Estimating Report and shows all input values both unit cost and quantities that were used to develop each alternative cost estimate for the Purple Line AA/DEIS report.

Comments On MTA Response

The electronic PDF version of the UCL included in Appendix A of the Capital Cost Report is not comparable to the actual spreadsheet requested. For example, the PDF cannot be adjusted or linked to other spreadsheet costs models for validation. Without the data in an electronic spreadsheet, the data will have to be

Comments On MTA's Workpaper Request Responses

manually entered and verified if any restatement of the capital costs figures are contemplated. In addition, as indicated in Comment No. 6 above, without a copy of the original electronic spreadsheet, viewing the flow of calculations and auditing their sources may not be possible. MTA acknowledges this fact on Page 4-4 of its Capital Cost Report where it states it uses Microsoft Excel spreadsheets to develop its capital cost estimates because spreadsheets "... allow a thorough review and checking of the cost data in order to avoid clerical and mathematical errors."

8. CCC Request No. 8

Please provide an electronic copy of the cost information database used to develop the capital costs for each alternative as described in Sections 4.2.3 and 4.2.4 of the Capital Cost Report, including all links to the UCL and links to any separate databases which contain the quantity and units for each transit alternative.

MTA Response

Your request is granted and denied. A print copy of all estimate back-up sheets will be provided. The spreadsheets used are a proprietary tool of PB, that was developed independent of contract with MTA, thus the request is denied pursuant to State Gov't Art., §10-617 (d). (148 pages)

Comments On MTA Response

As indicated in Comment Nos. 6 and 7 above, hard copy worksheets may or may not be helpful depending upon the level of explanation included as to how calculations included were made. If the back-up sheets consist of unformatted, unexplained figures, then the value will be minimal. What is important and needs to be examined are how the calculations were performed and the assumptions underlying the calculations.

9. CCC Request No. 9

Please provide electronic copies of the Federal Transit Authority ("FTA") Standard Cost Category ("SCC") Excel worksheets used to develop the cash flow projects for each alternative as described in Section 4.2.5 of the Capital Cost Report.

Comments On MTA's Workpaper Request Responses

MTA Response

Your request is granted and denied. There are no such work sheets as described, thus your request is denied. That notwithstanding, a blank copy of the FTA SCC worksheet will be provided free of charge.

Comments On MTA Response

Page 4-4 of the Capital Cost Report discusses the contents and use of the FTA's SCC Excel workbooks, which are required for FTA New Start projects. If MTA did not develop these workbooks as required, the question must be asked as to why not, and how did they believe they are complying with FTA New Start Procedures.

Also, the offer to supply a blank copy of the worksheet is a red herring, since blank copies are currently available for download from the FTA's website.

10. CCC Request No. 10

Please provide the electronic workpapers used to develop the capital cost estimates shown in Table 6-1 of the Capital Cost Report.

MTA Response

Your request is granted and denied. A print copy of all estimate back-up sheets will be provided. The spreadsheets used are a proprietary tool of a private entity, that was developed independent of contract with MTA, thus the request is denied pursuant to State Gov't Art., §10-617 (d). (148 pages)

Comments On MTA Response

As indicated in Comment No. 8 above, a print copy may not provide sufficient detail to fully verify MTA's results.

11. CCC Request No. 11

Please provide the electronic workpapers used to calculate the Annualized Capital Costs shown in Table 6-3 of the DEIS.

Comments On MTA's Workpaper Request Responses

MTA Response

Your request is granted, however, it is being provided as printed documents, not electronically. (1 page)

Comments On MTA Response

As indicated in Comment Nos. 6, 7, 8 and 10 above, printed documents may not provide sufficient detail to verify MTA's calculations. In addition, it is highly doubtful that the annualized Capital Costs can be calculated for all alternatives in 1 page of calculations. As explained on page 4-5 of the Capital Cost Report, annualized capital costs are calculated by multiplying each capital cost item by an annualization factor. There are approximately 49 different capital cost categories, which means at least 49 different calculations for each alternative.

C. User Benefits

12. CCC Request No. 12

Please provide the electronic workpapers used to develop the Annualized Cost Per Hour of Unit Benefits shown in Tables 6-2 and 6-3 of the DEIS.

MTA Response

Your request is granted, however, it is being provided as printed documents, not electronically. (1 page)

Comments On MTA Response

As indicated in Comment Nos. 6, 7, 8, 10 and 11 above, printed documents may not provide sufficient detail to verify MTA's calculations.

Comments On MTA's Workpaper Request Responses

13. CCC Request No. 13

Please provide the electronic workpapers used to develop the Annualized Cost Per New Rider Relative to the No Build Alternative shown in Table 6-3 of the DEIS.

MTA Response

Your request is granted, however, it is being provided as printed documents, not electronically. (1 page)

Comments On MTA Response

As indicated in Comment Nos. 6, 7, 8, 10, 11 and 12 above, printed documents may not provide sufficient detail to verify MTA's calculations.

Restated Table 4-2 -- Annualization Factors

<u>SCC Category</u>		<u>Useful Life (years)</u>	<u>Annualization Factor at 7 Percent 1/</u>	<u>Annualization Factor at 10 Percent 2/</u>
(1)		(2)	(3)	(4)
1.	10.01 Guideway: At-grade exclusive right-of-way	125	0.070	0.100
2.	10.02 Guideway: At-grade semi-exclusive (allows cross-traffic)	30	0.081	0.106
3.	10.03 Guideway: At-grade in mixed traffic	20	0.094	0.117
4.	10.04 Guideway: Aerial structure	80	0.070	0.100
5.	10.05 Guideway: Built-up fill	80	0.070	0.100
6.	10.06 Guideway: Underground cut & cover	125	0.070	0.100
7.	10.07 Guideway: Underground tunnel	125	0.070	0.100
8.	10.08 Guideway: Retained cut or fill	125	0.070	0.100
9.	10.09 Track: Direct fixation	30	0.081	0.106
10.	10.10 Track: Embedded	20	0.094	0.117
11.	10.11 Track: Ballasted	35	0.077	0.104
12.	10.12 Track: Special (switches, turnouts)	30	0.081	0.106
13.	10.13 Track: Vibration and noise dampening	30	0.081	0.106
14.	20.01 At-grade station, stop, shelter, mall, terminal, platform	70	0.071	0.100
15.	20.02 Aerial station, stop, shelter, mall, terminal, platform	70	0.071	0.100
16.	20.03 Underground station, stop, shelter, mall, terminal, platform	125	0.070	0.100
17.	20.04 Other stations, landings, terminals: Intermodal, ferry, trolley, etc.	70	0.071	0.100
18.	20.05 Joint development	70	0.071	0.100
19.	20.06 Automobile parking multi-story structure	50	0.072	0.101
20.	20.07 Elevators, escalators	30	0.081	0.106
21.	30.01 Administration Building: Office, sales, storage, revenue counting	50	0.072	0.101
22.	30.02 Light Maintenance Facility	50	0.072	0.101
23.	30.03 Heavy Maintenance Facility	50	0.072	0.101
24.	30.04 Storage or Maintenance of Way Building	50	0.072	0.101
25.	30.05 Yard and Yard Track	80	0.070	0.100
26.	40.01 Demolition, Clearing, Earthwork	125	0.070	0.100
27.	40.02 Site Utilities, Utility Relocation	125	0.070	0.100
28.	40.03 Haz. mat'l, contam'd soil removal/mitigation, ground water treatments	125	0.070	0.100
29.	40.04 Environmental mitigation, e.g. wetlands, historic/archeologic, parks	125	0.070	0.100
30.	40.05 Site structures including retaining walls, sound walls	80	0.070	0.100
31.	40.06 Pedestrian / bike access and accommodation, landscaping	20	0.094	0.117
32.	40.07 Automobile, bus, van accessways including roads, parking lots	20	0.094	0.117
33.	40.08 Temporary Facilities and other indirect costs during construction	100	0.070	0.100
34.	50.01 Train control and signals	30	0.081	0.106
35.	50.02 Traffic signals and crossing protection	30	0.081	0.106
36.	50.03 Traction power supply: substations	50	0.072	0.101
37.	50.04 Traction power distribution: catenary and third rail	30	0.081	0.106
38.	50.05 Communications	20	0.094	0.117
39.	50.06 Fare collection system and equipment	25	0.086	0.110
40.	50.07 Central Control	30	0.081	0.106
41.	60.01 Purchase or lease of real estate	125	0.070	0.100
42.	60.02 Relocation of existing households and businesses	125	0.070	0.100
43.	70.01 Light Rail	25	0.086	0.110
44.	70.02 Heavy Rail	25	0.086	0.110
45.	70.03 Commuter Rail	25	0.086	0.110
46.	70.04 Bus	12	0.126	0.147
47.	70.05 Other	12	0.126	0.147
48.	70.06 Non-revenue vehicles	12	0.126	0.147
49.	70.07 Spare parts	12	0.126	0.147

1/ $7\% \div [1 - (1 + 7\%)^{(\text{Column (2)})}]$.

2/ $10\% \div [1 - (1 + 10\%)^{(\text{Column (2)})}]$.

Restated Table 3-2: MTA Bus O&M Cost Model
(2003 - 2005 Average Expenses at September 2007 Price Levels)

		Annual Costs and Attribution 2/		
<u>Item</u>	<u>Annual</u>	<u>Revenue</u>	<u>Revenue Vehicle</u>	<u>Peak</u>
(1)	<u>Cost 1/</u>	<u>Vehicle Hours</u>	<u>Miles</u>	<u>Vehicles</u>
	(2)	(3)	(4)	(5)
<u>Vehicle Operations Labor</u>				
1. Operator Salaries and Wages	\$53,661,816	\$53,661,816		
2. Other Salaries and Wages	10,934,101	10,934,101		
3. Fringe Benefits	43,217,728	43,217,728		
4. Services	<u>132,433</u>	<u>132,433</u>		
5. Sub-Total	\$107,946,078	\$107,946,078		
<u>Vehicle Operations Materials and Supplies</u>				
6. Fuels and Lubricants	\$10,646,430		\$10,646,430	
7. Tires and Tubes	1,055,082		1,055,082	
8. Other Materials/Supplies	160,838		160,838	
9. Utilities	0		0	
10. Casualty and Liability	0		0	
11. Miscellaneous	0		0	
12. Expense Transfers	0		0	
13. Sub-Total	\$11,862,350		\$11,862,350	
<u>Vehicle Maintenance Labor</u>				
14. Other Salaries and Wages	\$22,685,647		\$22,685,647	
15. Fringe Benefits	15,183,476		15,183,476	
16. Services	<u>1,599,919</u>		<u>1,599,919</u>	
17. Sub-Total	\$39,469,042		\$39,469,042	
<u>Vehicle Maintenance Materials and Supplies</u>				
18. Fuels and Lubricants	\$726,797		\$726,797	
19. Tires and Tubes	0		0	
20. Other Materials and Supplies	18,108,075		18,108,075	
21. Utilities	0		0	
22. Casualty and Liabilities	408,355		408,355	
23. Taxes	0		0	
24. Miscellaneous	0		0	
25. Expense Transfer	0		0	
26. Sub-Total	\$19,243,228		\$19,243,228	
<u>Non-Vehicle Maintenance Labor</u>				
27. Other Salaries and Wages	\$2,849,394			\$2,849,394
28. Fringe Benefits	1,907,056			1,907,056
29. Services	<u>1,180,502</u>			<u>1,180,502</u>
30. Sub-Total	\$5,936,953			\$5,936,953
<u>Non-Vehicle Maintenance Materials and Supplies</u>				
31. Fuel and Lubricants	\$0			\$0
32. Tires and Tubes	0			0
33. Other Materials and Supplies	1,133,943			1,133,943
34. Utilities	0			0
35. Casualty and Liability	418,334			418,334
36. Taxes	0			0
37. Miscellaneous	0			0
38. Expense Transfer	0			0
39. Sub-Total	\$1,552,277			\$1,552,277
<u>General Administration</u>				
40. Other Salaries and Wages	\$18,375,290			\$18,375,290
41. Fringe Benefits	12,292,434			12,292,434
42. Services	5,839,841			5,839,841
43. Fuels and Lubricants	0			0
44. Tires and Tubes	0			0
45. Other Materials and Supplies	2,463,249			2,463,249
46. Utilities	3,902,588			3,902,588
47. Casualty and Liability	3,602,128			3,602,128
48. Taxes	0			0
49. Miscellaneous	2,825,157			2,825,157
50. Expense Transfer	<u>-14,029,428</u>			<u>-14,029,428</u>
51. Sub-Total	\$35,271,259			\$35,271,259
52. Total	\$221,281,186	\$107,946,078	\$70,574,620	\$42,760,488
53. Average Units Per Year 3/	---	1,746,564	19,590,300	598
54. Unit Costs (September 2007 Dollars) 4/	---	\$61.80	\$3.60	\$71.506

1/ Source: Federal Transit Administration's National Transit Database File "Operating Expenses.xls." Figures shown are the simple average of 2003 to 2005 reported expenses indexed to September 2007 price levels by use of the Producer's Price Index.

2/ Cost allocation is the same as used in the DEIS.

3/ Source: Federal Transit Administration's National Transit Database File "Service.xls." Figures shown are the simple average of 2003 to 2005 reported figures.

4/ Line 52 - Line 53.

Restated Table 3-3: MTA Light Rail O&M Cost Model
(2003 Expenses at September 2007 Price Levels)

		Annual Costs and Attribution 2/			
Item	Annual	Revenue	Revenue	Peak	Track
(1)	Cost 1/	Train Hours	Car-Miles	Vehicles	Miles
	(2)	(3)	(4)	(5)	(6)
<u>Vehicle Operations Labor</u>					
1. Operator Salaries and Wages	\$3,132,738	\$3,132,738	\$0	\$0	\$0
2. Other Salaries and Wages	5,883,151	5,883,151	0	0	0
3. Fringe Benefits	6,090,007	6,090,007	0	0	0
4. Services	<u>1,592,421</u>	<u>1,592,421</u>	<u>0</u>	<u>0</u>	<u>0</u>
5. Sub-Total	\$16,698,317	\$16,698,317	\$0	\$0	\$0
<u>Vehicle Operations Materials and Supplies</u>					
6. Fuels and Lubricants	\$6,833	\$0	\$6,833	\$0	\$0
7. Tires and Tubes	0	0	0	0	0
8. Other Materials/Supplies	19,538	0	19,538	0	0
9. Utilities	1,331,572	0	1,331,572	0	0
10. Casualty and Liability	0	0	0	0	0
11. Miscellaneous	0	0	0	0	0
12. Expense Transfers	0	0	0	0	0
13. Sub-Total	\$1,357,943	\$0	\$1,357,943	\$0	\$0
<u>Vehicle Maintenance Labor</u>					
14. Other Salaries and Wages	\$2,445,941	\$0	\$2,445,941	\$0	\$0
15. Fringe Benefits	1,652,172	0	1,652,172	0	0
16. Services	<u>137,956</u>	<u>0</u>	<u>137,956</u>	<u>0</u>	<u>0</u>
17. Sub-Total	\$4,236,069	\$0	\$4,236,069	\$0	\$0
<u>Vehicle Maintenance Materials and Supplies</u>					
18. Fuels and Lubricants	\$23,872	\$0	\$23,872	\$0	\$0
19. Tires and Tubes	0	0	0	0	0
20. Other Materials and Supplies	1,827,623	0	1,827,623	0	0
21. Utilities	0	0	0	0	0
22. Casualty and Liabilities	327,057	0	327,057	0	0
23. Taxes	0	0	0	0	0
24. Miscellaneous	0	0	0	0	0
25. Expense Transfer	0	0	0	0	0
26. Sub-Total	\$2,178,552	\$0	\$2,178,552	\$0	\$0
<u>Non-Vehicle Maintenance Labor</u>					
27. Other Salaries and Wages	\$3,394,762	\$0	\$0	\$0	\$3,394,762
28. Fringe Benefits	2,293,077	0	0	0	2,293,077
29. Services	<u>1,901,348</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>1,901,348</u>
30. Sub-Total	\$7,589,187	\$0	\$0	\$0	\$7,589,187
<u>Non-Vehicle Maintenance Materials and Supplies</u>					
31. Fuel and Lubricants	\$0	\$0	\$0	\$0	\$0
32. Tires and Tubes	0	0	0	0	0
33. Other Materials and Supplies	405,646	0	0	0	405,646
34. Utilities	0	0	0	0	0
35. Casualty and Liability	14,021	0	0	0	14,021
36. Taxes	0	0	0	0	0
37. Miscellaneous	0	0	0	0	0
38. Expense Transfer	0	0	0	0	0
39. Sub-Total	\$419,667	\$0	\$0	\$0	\$419,667
<u>General Administration</u>					
40. Other Salaries and Wages	\$564,745	\$0	\$0	\$564,745	\$0
41. Fringe Benefits	381,471	0	0	381,471	0
42. Services	711,622	0	0	711,622	0
43. Fuels and Lubricants	0	0	0	0	0
44. Tires and Tubes	0	0	0	0	0
45. Other Materials and Supplies	260,011	0	0	260,011	0
46. Utilities	723,323	0	0	723,323	0
47. Casualty and Liability	315,040	0	0	315,040	0
48. Taxes	0	0	0	0	0
49. Miscellaneous	355,669	0	0	355,669	0
50. Expense Transfer	<u>-1,290,069</u>	<u>0</u>	<u>0</u>	<u>-1,290,069</u>	<u>0</u>
51. Sub-Total	\$2,021,812	0	0	\$2,021,812	0
52. Total	\$34,501,547	\$16,698,317	\$7,772,564	\$2,021,812	\$8,008,854
53. Average Units Per Year 3/	---	108,015	2,781,102	33	58
54. Unit Costs (2003 Dollars) 4/	---	\$154.59	\$2.79	\$61.267	\$139,043
55. Unit Costs (September 2007 Dollars) 5/		\$194.22	\$3.51	\$76,971.98	\$174,684.23

1/ Source: Federal Transit Administration's National Transit Database File "Operating Expenses.xls." Figures shown are reported 2003 expenses.

2/ Cost allocation is the same as used in the DEIS.

3/ Source: Federal Transit Administration's National Transit Database File "Service.xls." Figures shown are 2003 reported units.

4/ Line 52 ÷ Line 53.

5/ Line 54 x 1.256, or the index factor for the change in the PPI between 2003 and September 2007.

Restated Table 3-4: WMATA Bus O&M Cost Model
(2003 - 2005 Average Expenses at September 2007 Price Levels)

Item (1)	Annual Cost 1/ (2)	Annual Costs and Attribution 2/		
		Revenue Vehicle Hours (3)	Revenue Vehicle Miles (4)	Peak Vehicles (5)
<u>Vehicle Operations Labor</u>				
1. Operator Salaries and Wages	\$126,896,752	\$126,896,752		
2. Other Salaries and Wages	20,950,994	20,950,994		
3. Fringe Benefits	75,071,152	75,071,152		
4. Services	5,134	5,134		
5. Sub-Total	\$222,924,032	\$222,924,032		
<u>Vehicle Operations Materials and Supplies</u>				
6. Fuels and Lubricants	\$17,607,286		\$17,607,286	
7. Tires and Tubes	2,661,906		2,661,906	
8. Other Materials/Supplies	279,515		279,515	
9. Utilities	0		0	
10. Casualty and Liability	0		0	
11. Miscellaneous	0		0	
12. Expense Transfers	0		0	
13. Sub-Total	\$20,548,707		\$20,548,707	
<u>Vehicle Maintenance Labor</u>				
14. Other Salaries and Wages	\$62,717,636		\$62,717,636	
15. Fringe Benefits	31,356,751		31,356,751	
16. Services	1,705,070		1,705,070	
17. Sub-Total	\$95,779,458		\$95,779,458	
<u>Vehicle Maintenance Materials and Supplies</u>				
18. Fuels and Lubricants	\$4,116,421		\$4,116,421	
19. Tires and Tubes	0		0	
20. Other Materials and Supplies	31,278,921		31,278,921	
21. Utilities	0		0	
22. Casualty and Liabilities	0		0	
23. Taxes	0		0	
24. Miscellaneous	0		0	
25. Expense Transfer	0		0	
26. Sub-Total	\$35,395,342		\$35,395,342	
<u>Non-Vehicle Maintenance Labor</u>				
27. Other Salaries and Wages	\$14,073,619			\$14,073,619
28. Fringe Benefits	7,210,446			7,210,446
29. Services	1,439,019			1,439,019
30. Sub-Total	\$22,723,084			\$22,723,084
<u>Non-Vehicle Maintenance Materials and Supplies</u>				
31. Fuel and Lubricants	\$0			\$0
32. Tires and Tubes	0			0
33. Other Materials and Supplies	399,577			399,577
34. Utilities	0			0
35. Casualty and Liability	0			0
36. Taxes	0			0
37. Miscellaneous	0			0
38. Expense Transfer	0			0
39. Sub-Total	\$399,577			\$399,577
<u>General Administration</u>				
40. Other Salaries and Wages	\$29,460,175			\$29,460,175
41. Fringe Benefits	14,835,762			14,835,762
42. Services	11,143,355			11,143,355
43. Fuels and Lubricants	0			0
44. Tires and Tubes	0			0
45. Other Materials and Supplies	4,205,856			4,205,856
46. Utilities	5,901,004			5,901,004
47. Casualty and Liability	7,698,506			7,698,506
48. Taxes	0			0
49. Miscellaneous	2,183,834			2,183,834
50. Expense Transfer	-225,956			-225,956
51. Sub-Total	\$75,202,535			\$75,202,535
52. Total	\$472,972,735	\$222,924,032	\$151,723,507	\$98,325,196
53. Average Units Per Year 3/	---	3,438,387	38,752,591	1,196
54. Unit Costs (September 2007 Dollars) 4/	---	\$64.83	\$3.92	\$82.23

1/ Source: Federal Transit Administration's National Transit Database File "Operating Expenses.xls." Figures shown are the simple average of 2003 to 2005 reported expenses indexed to September 2007 price levels by use of the Producer's Price Index.

2/ Cost allocation is the same as used in the DEIS.

3/ Source: Federal Transit Administration's National Transit Database File "Service.xls." Figures shown are the simple average of 2003 to 2005 reported figures.

4/ Line 52 ÷ Line 53.

Restated Table 3-5: Montgomery County Bus O&M Cost Model
(2003 - 2005 Average Expenses at September 2007 Price Levels)

		Annual Costs and Attribution 2/			
Item (1)	Annual Cost 1/ (2)	Revenue Vehicle Hours (3)	Revenue Vehicle Miles (4)	Peak Vehicles (5)	
<u>Vehicle Operations Labor</u>					
1. Operator Salaries and Wages	\$19,904,777	\$19,904,777			
2. Other Salaries and Wages	2,169,923	2,169,923			
3. Fringe Benefits	12,788,788	12,788,788			
4. Services	508,683	508,683			
5. Sub-Total	\$35,372,171	\$35,372,171			
<u>Vehicle Operations Materials and Supplies</u>					
6. Fuels and Lubricants	\$4,638,005		\$4,638,005		
7. Tires and Tubes	3,460,538		3,460,538		
8. Other Materials/Supplies	3,244,983		3,244,983		
9. Utilities	89,109		89,109		
10. Casualty and Liability	1,196,376		1,196,376		
11. Miscellaneous	6,030,582		6,030,582		
12. Expense Transfers	0		0		
13. Sub-Total	\$18,659,593		\$18,659,593		
<u>Vehicle Maintenance Labor</u>					
14. Other Salaries and Wages	\$0		\$0		
15. Fringe Benefits	554,104		554,104		
16. Services	1,398,402		1,398,402		
17. Sub-Total	\$1,952,506		\$1,952,506		
<u>Vehicle Maintenance Materials and Supplies</u>					
18. Fuels and Lubricants	\$137,285		\$137,285		
19. Tires and Tubes	1,634,969		1,634,969		
20. Other Materials and Supplies	1,934,533		1,934,533		
21. Utilities	0		0		
22. Casualty and Liabilities	880,772		880,772		
23. Taxes	0		0		
24. Miscellaneous	0		0		
25. Expense Transfer	0		0		
26. Sub-Total	\$4,587,558		\$4,587,558		
<u>Non-Vehicle Maintenance Labor</u>					
27. Other Salaries and Wages	\$0			\$0	
28. Fringe Benefits	157,630			157,630	
29. Services	313,586			313,586	
30. Sub-Total	\$471,216			\$471,216	
<u>Non-Vehicle Maintenance Materials and Supplies</u>					
31. Fuel and Lubricants	\$0			\$0	
32. Tires and Tubes	0			0	
33. Other Materials and Supplies	4,008,054			4,008,054	
34. Utilities	0			0	
35. Casualty and Liability	0			0	
36. Taxes	0			0	
37. Miscellaneous	23,872			23,872	
38. Expense Transfer	0			0	
39. Sub-Total	\$4,031,926			\$4,031,926	
<u>General Administration</u>					
40. Other Salaries and Wages	\$3,600,388			\$3,600,388	
41. Fringe Benefits	2,012,497			2,012,497	
42. Services	516,773			516,773	
43. Fuels and Lubricants	0			0	
44. Tires and Tubes	0			0	
45. Other Materials and Supplies	125,463			125,463	
46. Utilities	0			0	
47. Casualty and Liability	13,547			13,547	
48. Taxes	0			0	
49. Miscellaneous	458,385			458,385	
50. Expense Transfer	0			0	
51. Sub-Total	\$6,727,054			\$6,727,054	
52. Total	\$71,802,024	\$35,372,171	\$25,199,657	\$11,230,195	
53. Average Units Per Year 3/	---	637,280	8,947,756	198	
54. Unit Costs (September 2007 Dollars) 4/	---	\$55.50	\$2.82	\$56.623	

1/ Source: Federal Transit Administration's National Transit Database File "Operating Expenses.xls." Figures shown are the simple average of 2003 to 2005 reported expenses indexed to September 2007 price levels by use of the Producer's Price Index

2/ Cost allocation is the same as used in the DEIS, except for Line 11 which moves the costs from Column (5) to Column (5).

3/ Source: Federal Transit Administration's National Transit Database File "Service.xls." Figures shown are the simple average of 2003 to 2005 reported figures

4/ Line 52 ÷ Line 53

**Comparison of Other LRT Projects
To Purple Line Alternative Operating Costs**

<u>LRT System</u>	<u>Total Operating Budget (millions) 1/</u>	<u>Weekday Passenger Volume 2/</u>	<u>Operating Cost Per Passenger 3/</u>
(1)	(2)	(3)	(4)
<u>Other LRT Systems</u>			
1. Dallas Dart Light Rail	\$76.0	65,000	\$4.50
2. New Orleans Streetcar Lines	\$17.0	16,000	\$4.09
3. Buffalo MetroRail	\$22.0	21,000	\$4.03
4. Minneapolis Light Rail Systems	\$25.0	25,000	\$3.85
5. Charlotte Lynx Blue Line	\$12.0	14,000	\$3.30
6. Philadelphia Subway Surface Lines	\$54.0	107,000	\$1.94
7. San Diego Trolley	\$56.0	111,000	\$1.94
8. Denver Light Rail	\$29.0	61,000	\$1.83
9. Houston Metro Rail	\$15.0	43,000	\$1.34
10. Boston MBTA Green Line	\$50.0	237,000	\$0.81
11. Other System Average	\$35.6	70,000	\$2.76
12. Other System Median	\$27.0	52,000	\$2.62
<u>Purple Line</u>			
13. Purple Line - Low Investment	\$26.4	59,300	\$1.71
14. Purple Line - Medium Investment	\$25.0	62,600	\$1.54
15. Purple Line - High Investment	\$22.8	68,100	\$1.29

1/ Lines 1 to 10 from "The Urban Transportation Monitor," May 16, 2008 , pages 12 to 13 and reflect Year 2007 annual operating budgets. Lines 13 to 15 from the AA/DEIS which shows O&M costs at 2007 price levels.

2/ The study from which the operating budget figures were obtained lists weekday passenger volume. The DEIS shows volumes in daily passengers.

3/ (Column (2) x 1,000,000) ÷ (Column (3) passenger count x 52 weeks x 5 weekdays).

VERIFIED STATEMENT OF WILLIAM G. ALLEN, JR., P.E.

My name is William G. Allen, Jr., P.E. and my business address is P.O. Box 390, Windsor, SC 29856. I am a sole proprietor transportation planning consultant, specializing in travel demand forecasting. After 16 years in Northern Virginia, my practice recently relocated to Windsor, SC. I have over 25 years of experience in performing a wide variety of transportation, traffic, and transit studies and have worked on numerous projects in the Washington, DC area. I am a licensed professional engineer in Virginia and New Jersey. My professional resume is attached.

My assignment for this project was to review and comment upon the Maryland Transit Administration's (MTA) transit ridership, travel demand, and transit user benefit analyses for the Purple Line as set forth in the AA/DEIS. This review included the *Purple Line Alternatives Analysis/Draft Environmental Impact Statement* (dated September 2008), the accompanying *Travel Demand Forecasting Technical Report*, and several documents prepared by Sam Schwartz Engineering for the Town of Chevy Chase on this matter during 2008. My review covered the methodology, assumptions, and results of the MTA analysis.

The following is a summary of my key observations:

- (1) Based on the materials that have been made publicly available, MTA and its contractors appear to have made some serious errors in their analysis of ridership and user benefits. These errors may be meaningful with respect to the findings described in the AA/DEIS, but it is impossible to verify this from the information presented so far.

- (2) Most of the supporting technical details concerning the travel forecasting methodology cannot be evaluated because this information has not been provided by MTA. The development, assumptions, and calibration of the travel demand model are not included in the documents made available by MTA, as they are in most other such studies.
- (3) The Columbia Country Club (CCC) has requested more detailed information on the travel model and the inputs to the travel forecasting process. The analysis necessary for an objective evaluation of the ridership estimates cannot be performed without these documents and data. CCC has requested further information of MTA concerning technical details of the travel forecasting model, supporting calculations for various inputs to the model (such as transit speed, passenger walk times, etc.), and machine-readable data files containing various key inputs to the model, for each of the alternative scenarios analyzed by MTA. An independent review of these items is necessary to ensure that they do not contain material errors and that they represent an objective and reasonable description of each alternative. MTA has responded that it will not provide some requested information because it is "proprietary," that some information requested does not exist and that some information will be provided. The "proprietary" information that MTA is refusing to provide effectively prevents external review of MTA's travel forecasting assumptions, calculations and results. Also, some of the information MTA says does not exist, must exist in order for MTA to make its ridership forecasts. I have not yet had the opportunity to review the limited amount of data that MTA says it will produce, but based upon MTA's description of this data, it appears to be far less than (or different from) the data sets CCC requested.
- (4) An objective analysis of MTA's ridership forecast is important because prior Federal reviews of such studies has identified a consistent trend towards overestimating future ridership on fixed guideway transit systems, in some cases by substantial margins.
- (5) Based on data in the AA/DEIS, a key justification of the Purple Line comes into question. The line was supposed to serve east-west demand, but MTA's own estimate of the high proportion of riders who need to transfer indicates that much of the demand is in fact radially oriented towards Washington. This suggests that short-haul feeder buses focused on each Metrorail station would have been a more cost-effective alternative.

The following analysis supports these conclusions.

The AA/DEIS report and the supporting Travel Demand Forecasting Technical Report both make major errors in reporting transit ridership and user benefit

numbers. Table 1-2 on page 1-9 ("Daily Transit Trips, Origins, and Destinations by District, 2000") says the number of year 2000 (linked) transit trips is 888,951. This is consistent with actual counts of around 900,000 in 1999 and MWCOG's 2005 estimate of 973,000. However, the AA/DEIS authors have misinterpreted this figure in other parts of the report. For example, page 1-8 says "By the year 2030, daily transit trips are forecast to grow by 52 percent or from 953,000 to 2,711,000." Not only is this mathematically incorrect, but it is based on a serious misunderstanding of the difference between *trips* and *trip ends*.

Each trip has two ends (a beginning and an end) and so the number of trip ends is always exactly twice the number of trips. Table 3-9, "Regional Transit Trips" (page 3-5) says that the total regional transit trips in 2000 is 1,778,000. That figure is almost exactly double the total reported in Table 1-2 and obviously represents trip ends, not trips. Table 3-9 further reports about 2.7 million regional trips in 2030 for the other scenarios and this is also high by a factor of two. In fact, Tables 3-8 ("Year 2030 Total Daily Linked Transit Trips") and 3-9, on the same page in the AA/DEIS, are inconsistent with each other. Table 3-8 appears to be correct, while Table 3-9 is either labelled incorrectly or contains incorrect figures. Similarly, the statement in the text immediately to the left of Table 3-9 corrects the mathematical error on page 1-8, but is still wrong: "Referring to Table 3-9, by the year 2030 under the No Build, daily transit trips are forecast to grow by 953,000, 52 percent, for a total of 2,711,000." Page 1-7 also cites several transit trip figures that are similarly wrong. It is not uncommon for

general planners to misunderstand the distinction between trips and trip ends and mistakenly inflate the ridership numbers reported by the travel demand model. This error is prevalent throughout the report.

Similarly, the AA/DEIS makes a substantial error in its calculation and reporting of transit user benefits (UB). *User benefits* are an econometric measure of future improvements in the quality of transit service, including both existing riders and newly attracted riders. This measure of effectiveness was developed recently by the Federal Transit Administration (FTA) as a way of comparing potential transit improvements across the country.

The fifth column of Table 6-3 ("FTA Cost-Effectiveness Measures", page 6-8) is incorrect. The table implies that the $\text{cost/UB} = (\text{alternative cost} - \text{TSM cost}) / (\text{alternative UB} - \text{TSM UB})$. This is incorrect. By its very nature, the UB calculation *always* compares one scenario to another. So the user benefits for alternative X (according to FTA) are defined as the difference in equivalent in-vehicle time between alternative X and the Transportation System Management (TSM) alternative. In this table the "Annual User Benefit (Hours)" column is incorrect, as it calculates the difference between the UB of each alternative and the UB of the TSM scenario, which makes no logical sense. The correct equation is: $\text{cost/UB} = (\text{alternative cost} - \text{TSM cost}) / \text{alternative UB}$. (By the way, the AA/DEIS calculates user benefits for the TSM alternative calculated as the difference in equivalent in-vehicle time between the TSM and No Build alternative. This is irrelevant for a New Starts application; FTA does not

use this number in New Starts evaluation.) However, the far right column of Table 6-3 is somehow correct (it must have been extracted from another table and not calculated from this one). In the Executive Summary, this error affects the figures shown for "User Benefits by Alternatives" and "Percent over TSM" figures on page ES-8.

There is virtually no documentation of the travel forecasting methodology in the materials that have been made publicly available. Usually, the travel forecasting documentation accompanying an AA/DEIS is composed of a Methodology section, which explains how the forecasting was done and some model validation statistics, and lists the important assumptions, travel relationships, and model coefficients and parameters, and a Results section, which gives the results. The Methodology section is absent in this case, making it impossible to evaluate the procedures that were used. The report says that a modified version of the Metropolitan Washington Council of Governments (MWCOC) travel model was used, with modified input data. Although documentation of the basic MWCOC model is available on MWCOC's web site, MTA has provided no description of the modifications made for this study. More information on the mode choice model's coefficients, the assumptions implicit in the model, and the calibration of the entire model is necessary. At the minimum, the technical details of the model should have been documented in a report that should have been made available on the AA/DEIS project's web site.

In order to obtain the missing information, CCC filed requests with MTA on November 17, 2008. MTA responded on December 22, 2008. I have reviewed CCC's

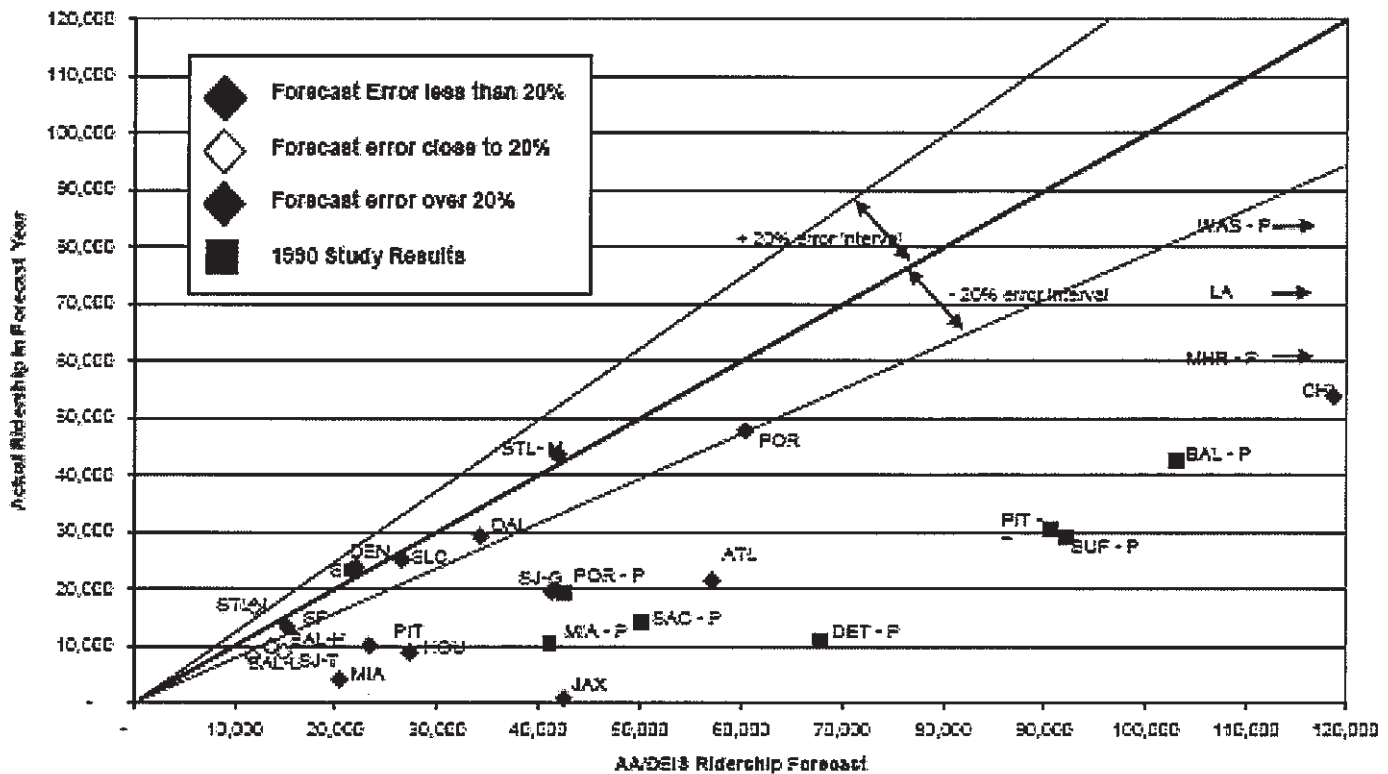
requests and MTA's response. I address here, MTA's responses to CCC's requests concerning MTA's Travel Demand Forecasting Technical Report. Request No. 16 seeks calibration model run data. MTA refuses to provide this information, claiming it is "proprietary." By taking this position, MTA is effectively precluding any outside expert from independently reviewing the assumptions, inputs and outputs of these model runs. Request No. 19 asks for specified transit model input files. MTA says that "no document exists responsive to this request." However, unless this information was recently and purposely destroyed, it must exist (most likely in electronic format) in order for MTA to make the ridership forecasts set forth in the AA/DEIS. Requests Nos. 14, 15, 17, and 18 also seek specified travel demand data. MTA states that it will provide some material responsive to these requests, but as of the date of this statement, I have not had the opportunity to see or review this data. However, I note that based upon MTA's description of what it plans to produce, it appears that much of what CCC asked for in these four requests is not going to be produced.

AA/DEIS projects have a long history of overestimating ridership on new transit systems, as reported by FTA. A recent analysis is FTA's *Contractor Performance Assessment Report*, September 2007. This is FTA's annual report to Congress that "documents and analyzes the performance of contractors that develop cost and ridership estimates to support decision-making for New Starts and Small Starts projects." This report's principal conclusion is "While FTA's 2003 analysis of the predicted and actual ridership and cost information for 19 New Starts projects ... show

improvements versus those documented in the Department's 1990 report, there is considerable room for improvement." The 1990 report is the well-known "Pickrell report", which "... considered ten projects and found that only one project generated actual ridership that was more than 50 percent of the predicted ridership (specifically, 72 percent). Actual ridership for the other nine projects was less than 50 percent of their forecasts." (Discussion-piece #6, *Predicted and Actual Ridership of Proposed New Starts Projects*, Federal Transit Administration, June 6, 2006).

Although the 2007 report says that ridership forecasts have improved since 1990, it also makes it clear that most forecasts made for the years 2000 and 2005 were found to exceed the actual ridership numbers (see chart below).

Ridership Forecast vs. Actual



Key to Project Symbols

Atlanta HR* ('90)	NA	Dallas South Cent. CRT	DAL	Miami HR ('90)	MHR-P	San Diego El Cajon	SD
Atlanta North Line	ATL	Denver I-25 HOV	NA	Miami Omb/Grozel	MIA	San Jose Guadalupe	SJ-G
Baltimore HR ('90)	BAL-P	Denver SW LRT	DEN	Pittsburgh LR ('90)	PIT-P	San Jose Tamien West	SJ-T
Baltimore Johns Hopkins	BAL-H	Detroit DPM ('90)	DET-P	Pittsburgh West B'Way	PIT	Seattle Bus Tunnel	NA
Baltimore LRT Ext.	BAL-L	Houston SW Transitway	HOU	Portland LR ('90)	POR-P	St. Louis Initial System	STL-M
BART Colma	SF	Jacksonville ASE	JAX	Portland Westside-Hillbros	POR	St. Louis St. Clair Ext.	STL-E
Buffalo LR ('90)	BUF-P	L.A. Red Line	LA	Sacramento LR ('90)	SAC-P	Washington HR ('90)	WAS-P
Chicago Cnrg Line	CHI	Miami EPM ('90)	MIA-P	Salt Lake South LRT	SLC		

One of the principal causes involves assumptions about future conditions that prove to be overly optimistic. The analysis performed in most planning projects requires a great many assumptions. If each one is optimistic (i.e., leading to higher ridership), a situation occurs in which no single assumption is grossly incorrect, but the net cascading effect of several rosy assumptions results in a ridership estimate that is invariably later found to be inflated.

Although the AA/DEIS does not fully disclose these assumptions, I have identified a few that I believe have influenced the results:

- **Future Speeds:** The proposed alignment is about 16 miles long. Minor differences in future transit and auto operating speeds can have a major impact on travel time. MTA did not include signal pre-emption, resulting in a likely underestimation of bus rapid transit (BRT) speeds. Also, the assumed "High" light-rail transit (LRT) speed (19 mph) exceeds the actual average (17.2 mph) of 18 other systems, as calculated from a summary of existing LRT characteristics published in *The Urban Transportation Monitor* (a bi-weekly industry publication), dated 16 May 2008. Also, it is not clear whether peak traffic volumes and driving times would really be that much worse by 2030. The peak periods are already pretty congested today and can't realistically get a great deal worse. It is thus unlikely that the future peak auto speeds assumed in the model will be achieved, which results in an overestimate of transit demand.
- **System Constraints:** Fixed guideway transit systems operate under real world constraints that are often not reflected in travel demand models. The AA/DEIS used a modified version of the MWCOG travel forecasting model. When MWCOG applies the original version of this model, they constrain transit travel so that it does not increase beyond the year 2010. Their rationale is that since rail system ridership is currently at or near its capacity during peak periods and no major enhancements in Metrorail capacity are currently funded, it is inappropriate for a financially-constrained plan to forecast continued growth in rail ridership beyond 2010. The main constraints on capacity are the lengths of the rail platforms (they can accommodate a maximum of 8 cars per train), limits in the automatic train control system which prevent trains from running more frequently than every 2 minutes, limits on the number of trains that can be safely handled by the tunnels under the Potomac River, and the number of rail cars in the fleet (which limits the number of trains that can have 8 cars). MWCOG's practice of constraining ridership forecasts, which is almost unknown among area decision-makers, limits rail ridership in a more realistic fashion. The AA/DEIS did not mention whether this practice was followed, but it is unlikely that it did.

Further, for many years forecasts of Metrorail ridership have been made under the assumption that there is effectively infinite auto parking capacity at those rail stations that provide parking. That is, the estimates explicitly assume that everyone who wants to park-and-ride will be able to do so. Since the park-and-ride demand has almost always been forecasted to exceed the supply of parking spaces, this produces an unrealistically high forecast of ridership, on the order of

20%. The position of the Washington Metropolitan Area Transit Authority (WMATA) has been that those prospective riders who are unable to park at a station will use a feeder bus to access the station, thereby justifying the higher estimates. However, this is an unrealistic assumption and so some of the forecasts that are produced for other agencies do constrain ridership based on station parking capacity. The AA/DEIS mentions in brief passing that this was done, but provides no details on how it was done or what the effect on ridership was.

- **Base Realignment and Closure Commission (BRAC):** A recent major report by this agency recommended shifting some military employment to the National Naval Medical Center (NNMC) in Bethesda. Page 1-10 of the AA/DEIS says: "...the effects of BRAC will be negligible". Maybe so, when looking at the entire Washington region, but it's hard to imagine this would be the case at the local level. One specific effect of this employment shift in the travel model would be to draw some work trips away from surrounding areas, such as Bethesda CBD. This would make the NNMC campus more attractive as a destination, boosting the ridership of alternatives that serve this campus. The AA/DEIS ignores this effect.
- **Alternative-Specific Constants:** These constants represent numerical adjustments in the travel forecasting model to account for the un-quantified effects of each alternative, such as safety, security, reliability, comfort, etc. Normally, these constants are determined as part of model calibration, but this was not documented. Doing so would be especially difficult in this case, since neither of the principal transit modes (BRT, LRT) currently exists in the Washington area. Although FTA permits the use of alternative-specific constants in travel forecasting, it tries to limit their influence, since this is an area that is ripe for abuse by project sponsors. A particular concern is that the alternative-specific constant value will be chosen so as to deliberately overstate usage of a particular travel mode, especially for modes that are new to an area.

Table 3-59 of the *Travel Demand Forecasting Technical Report* (page 3-32) clearly indicates that 1/3 or more of the total user benefit for the "Build" scenarios is derived from the alternative-specific constants. Only 2/3 of the benefit is due to time savings (faster speed of BRT/LRT). Since neither BRT nor LRT service exist today in the Washington area, this means that 1/3 of the benefit of the build scenarios (and thus 1/3 of the ridership estimate) is basically a guess. Also, this table does not document whether BRT and LRT were treated differently from each other in this respect. The analysis by Sam Schwartz Engineering (SSE) asserts that MTA's alternative-specific constants favor LRT over BRT, but it's impossible to verify that from the AA/DEIS or the Travel Demand Report. If SSE is correct on this, it means that a sizeable part of the "benefit" of LRT is simply that it's a train. This means that the MTA's argument is that the study area needs a train *because* it's a train, a classic piece of circular logic.

As noted above, the available documentation does not provide enough data to evaluate the travel model or the details of the ridership estimate. In order to try to get some independent sense of the reasonableness of the AA/DEIS forecast, I analyzed 18 actual LRT systems using statistics reported in *The Urban Transportation Monitor* of 16 May 2008 (a bi-weekly industry publication). This information suggests that a system with 16 miles of track and 20 stations (which generally describes the Purple Line LRT build alternatives) will have about 40,000 – 45,000 riders per day, not the 59,000 – 68,000 that were estimated by MTA. The North American LRT system with the closest characteristics to the Purple Line is Edmonton, Alberta's system, which has 15.6 route-miles, average operating speed of 17 mph, 11 stations, and a daily ridership of 50,000. Although my review looked at existing ridership and not demand 20 years from now, it did include a mixture of new and mature LRT systems which have been operating long enough to experience stable ridership patterns, including some areas with development levels similar to those of the future study area. This review suggests that the AA/DEIS ridership figures may be about 40% too high.

It is also unclear that any of the Purple Line guideway alternatives achieves the principal stated purpose: to serve east-west cross-county travel demand. The AA/DEIS estimates 68,100 daily boardings on the High LRT Purple Line, but only 36,100 linked trips. That is, there are really 36,100 *passengers*, 32,000 of whom (89% !) have to transfer to another transit line to complete their trip (36,100 passengers + 32,000 transfers = 68,100 boardings). This suggests that the Purple Line in fact does not serve

cross-county travel demand so much as it functions to shuttle people to a Metrorail station, where they continue their radial trip towards or away from DC. This in turns suggests that a more effective alternative would have been a series of improved short-haul feeder buses focused on each Metrorail station. The AA/DEIS does not report whether such a scenario was ever analyzed.

VERIFICATION

STATE OF SOUTH CAROLINA)
)
AIKEN COUNTY) SS:

I, William G. Allen, verify that I have read the foregoing Statement, know the contents thereof, and that the same are true as stated to the best of my knowledge, information and belief.

William G. Allen

Subscribed and Sworn to before me
this 12 day of January, 2009.

[Signature]
Notary Public

My Commission expires: April 20, 2015



Resume

William G. Allen, Jr., P.E.

Experience

Transportation Consultant, Windsor, South Carolina, 2006 - present
Mitchells, Virginia, 1990 - 2006
Mahwah, New Jersey, 1988 - 1990

Started a consulting practice to provide transportation planning services to a limited number of clients. Main areas of specialty are travel demand modelling, traffic planning, and motor vehicle regulations. Consulting practice began in 1988. Typical projects:

- ◇ Development of time series rail ridership forecasting model for budget development, Washington Metropolitan Area Transit Authority
- ◇ Calibration of new regional travel forecasting model for the Washington, DC area as part of the Dulles Corridor Transportation Study
- ◇ Forecasts of transit ridership for Metrorail Alternatives Analysis study in Prince George's County, Maryland (Addison Road - Bowie corridor)
- ◇ Development of complete travel forecasting model sets for Harrisonburg, VA, Reading, PA, Lehigh Valley, PA, Sioux Falls, SD, Baltimore, MD, Charlotte, NC, New Orleans, LA
- ◇ Development of new suburban travel forecasting models for Stafford, Fairfax, Prince William, and Spotsylvania Counties, VA
- ◇ Mode choice, sub-mode choice, and rail mode of arrival application program development for Metropolitan Washington (DC) Council of Governments
- ◇ Preparation of traffic and revenue forecasts for E-470 and Northwest Parkway toll roads, Denver
- ◇ Specification of new trip distribution and mode choice models, Puget Sound Regional Council (Seattle)
- ◇ Preparation of new traffic and revenue forecasts for Dulles Greenway toll road, Loudoun County, Virginia
- ◇ Signal system coordination study for Culpeper, Virginia
- ◇ Application of suburban travel model to support calculation of highway impact fees, Stafford and Spotsylvania Counties, Virginia
- ◇ Development of service standards and system-level analyses for the Dallas Area Rapid Transit bus system
- ◇ Calibration of various new regional travel model components for Atlanta

Volvo Cars of North America, Rockleigh, New Jersey, 1983 - 1988
Engineer, Regulatory Affairs

Responsible for monitoring, analyzing, and interpreting future automotive regulatory requirements, and communicating these to the European and North American offices. Represented Volvo in industry meetings and before government agencies. Prepared comments concerning proposed Federal regulations on emissions, fuel economy, and theft prevention, and Canadian requirements, and California emissions requirements.

Barton-Aschman Associates, Inc., Washington, D.C., 1977 - 1983
Senior Associate; Transportation/Transit Planner

Directed and participated in a variety of transportation and transit planning projects, with emphasis on travel demand modelling. These involved the development of all kinds of multi-modal transportation models, including large-scale regional model systems, sketch planning methods, and microcomputer-based techniques. Also assisted on a variety of short-range transit, traffic, and parking studies. Typical projects:

Travel Demand Analysis

- ◇ Analysis of transit commuting trends in Washington, D.C. in connection with Metrorail expansion

- ◊ Calibration and testing of travel demand models for long-range transit system planning in Seattle, Houston, New Orleans, Buenos Aires, and southeast Florida
- ◊ Application of travel models for air quality analysis (New Orleans) and subway system alternatives and toll road planning (Buenos Aires)
- ◊ Development of sketch planning techniques for the analysis of transit improvement alternatives in New Orleans
- ◊ Survey analysis and development of planning methods for a regional transportation plan for Mexico City

Transportation Planning

- ◊ Preparation of a transportation plan for Harford County, Maryland
- ◊ Analysis of long-distance commuting alternatives for the Virginia suburbs of Washington, D.C.
- ◊ CBD transit, traffic, and parking analyses for Atlantic City, Birmingham, Newport News, and Columbus (Ohio)
- ◊ Central area parking management program for Lancaster, Pennsylvania

Transit Planning and Operations

- ◊ Development and application of rail transit operating cost models for Buenos Aires and New York City
- ◊ Preparation of route and schedule plan for Springfield, Missouri
- ◊ Analysis of private sector transit alternatives for Montgomery County, Maryland and Hickory, North Carolina

Sverdrup & Parcel and Associates, Inc. 1975 - 1977
Transportation Planner

Worked on transportation studies and project proposals. Areas of practice included paratransit planning, and site traffic circulation and parking analyses. Typical projects:

- ◊ Analysis of alternatives to Sunday bus service, Arlington County, Virginia
- ◊ Study of shared-ride taxi service for Arlington County, Virginia
- ◊ Traffic and parking studies for airports, hospitals, and college campuses in North Carolina, District of Columbia, and West Virginia

Education

Bachelor of Science in Civil Engineering, Rensselaer Polytechnic Institute, 1974
Master of Engineering in Civil Engineering, Rensselaer Polytechnic Institute, 1975

Professional Affiliations

Institute of Transportation Engineers
Society of Automotive Engineers
International Municipal Signal Association
Registered Professional Engineer: Virginia (No. 21779) and New Jersey (No. 30614)

Selected Publications

A New Method for Estimating Cold Start VMT, presented at the 63rd Annual Meeting of the Institute of Transportation Engineers, 1993 (with Gary Davies)

Use of GIS in Transit Alternatives Analysis, presented at the TRB Fourth Conference on Application of Transportation Planning Methods, 1993 (with S. Mukundan)

Model Improvements for Evaluating Pricing Strategies, presented at the 74th Annual Meeting of the Transportation Research Board, 1995

Multiple Occupancy Criterion HOV Modelling, presented at the TRB Fifth Conference on Application of Transportation Planning Methods, 1995

Calibration of an Employee Commute Options Model, presented at the TRB Fifth Conference on Application of Transportation Planning Methods, 1995

Forecasting the Cost of Driving, ITE Journal, February 1996

Using Traffic Models to Support Proffers, Planning in Virginia, Virginia Chapter, American Planning Association, November 1996

Modelling Carpool and Transit Park-and-Ride Lots, presented at the TRB Sixth Conference on Application of Transportation Planning Methods, 1997

Adaptable Assignment, presented at the TRB Sixth Conference on Application of Transportation Planning Methods, 1997

Modelling Commercial Vehicle Travel, presented at the TRB Ninth Conference on Application of Transportation Planning Methods, 2003 (with P. Agnello)

A Model of Journey Frequency, presented at the TRB Ninth Conference on Application of Transportation Planning Methods, 2003 (with G. Schultz)

Analysis of Time of Day Models from Various Urban Areas, presented at the TRB 11th Conference on Application of Transportation Planning Methods, 2007

**COMMENTS ON SEPTEMBER 2008 DRAFT
ENVIRONMENTAL IMPACT STATEMENT ISSUED BY
THE MARYLAND TRANSIT ADMINISTRATION
FOR THE PURPLE LINE/ALTERNATIVES ANALYSIS**

**VERIFIED STATEMENT AND REPORT OF PAUL H. REISTRUP
RAIL/TRANSIT ENGINEERING AND OPERATIONS CONSULTANT**

**ON BEHALF OF
COLUMBIA COUNTRY CLUB**

JANUARY 6, 2009

I. INTRODUCTION

A. Qualifications

My name is Paul H. Reistrup. I am an independent consultant on engineering and operational matters involving freight and passenger railroads, as well as passenger transit systems (both "heavy rail" and "light rail"). My address is 8614 Brook Road, McLean, VA 22102.

I have well over 40 years of experience in the rail engineering, operations, and management field, dealing with freight rail, passenger rail, and rail transit. My experience includes nearly four years (1975 to 1978) as President of Amtrak and, more recently, six years (1997 to 2002) as Vice President-Passenger Integration for CSX Transportation, Inc. (CSXT), in which position I was responsible for CSXT's relationships and interfaces with passenger rail transit providers on CSXT's lines and other tracks that shared CSXT's right-of-way, including Amtrak, MARC, VRE, Washington Metro, SEPTA (Philadelphia/Wilmington area), New Jersey Transit, and Metro North (New York City area). During this period I observed numerous interfaces between "standard" railroad freight and passenger tracks and operations and heavy rail/light rail transit tracks and operations, as well as hiker/biker trails.

A copy of my resume is appended hereto as Attachment A. As noted therein, I graduated from the United States Military Academy at West Point with a Bachelor of Science degree in Civil Engineering in 1954. My railroad career began with the Baltimore & Ohio Railroad (B&O), a predecessor of CSXT which owned and operated what is now CSXT's "Metropolitan Branch" between Washington, D.C. and Point of Rocks, MD, where it connected with other B&O (now CSXT) lines extending west to Cumberland, MD and beyond. I served at the B&O from 1959 to 1967 in

various positions including Division Engineer responsible for infrastructure maintenance, General Yardmaster, Trainmaster responsible for train and crew operations, Superintendent of Car Utilization and Distribution, Director of Passenger Service, and Assistant to Vice President-Executive Department. In 1967 I left the B&O and joined the Illinois Central Railroad as Vice President-Passenger Services, and later was Vice President-Intermodal Services and Senior Vice President-Traffic for the Illinois Central. In 1975 I was named President and CEO of Amtrak; during my tenure Amtrak acquired the Northeast Corridor between Washington and Boston from the Penn Central. I left Amtrak in 1978 to go into the consulting business, but returned to railroading twice – once in the late 1980's as President of the Monongahela Railway, a coal-hauling railroad in Pennsylvania and West Virginia, and again in 1997 when I returned to CSXT (the B&O's successor) as Vice President-Passenger Integration. I returned to my consulting practice in 2003.

When I was with the B&O in the 1950's and 1960's, it owned and operated the Georgetown Branch between Silver Spring, MD and Georgetown, DC, which handled general freight as well as coal destined to a small power plant in Georgetown. I was familiar with the Georgetown Branch and observed train operations over it. The Georgetown Branch was abandoned by CSXT (the B&O's successor) in the 1980's, and the track removed. The right of way has been used for a hiker/biker trail (known as the Georgetown Branch or Capital Crescent Trail) ever since.

B. Engagement

I was requested by Columbia Country Club of Chevy Chase, MD ("Columbia CC") to review and prepare a written report on the September 2008 Draft Environmental Impact Statement (DEIS) issued by the

Maryland Mass Transit Administration (MTA) with respect to the alternatives analysis for the proposed Purple Line transit project. In particular, I was asked to concentrate on the safety aspects and impacts of the project in terms of the relationship between the proposed Purple Line light rail alignment, light rail vehicle frequencies and speeds, and the following:

1. Homes, schools, other structures, and the Georgetown Branch (Capital Crescent) Trail between Bethesda and Silver Spring as well as the Columbia CC golf course;
2. The CSXT tracks in Silver Spring and vicinity; and
3. Homes, schools, other structures, and public roads between Silver Spring and New Carrollton.

In connection with this assignment, I reviewed the three "LRT" (light rail) route alignments for the High Investment, Medium Investment and Low Investment alternatives that were made available with the DEIS.¹ I also reviewed drawings prepared by MTA's engineering consultants showing the alignment of the Medium Investment LRT alternative as proposed in the DEIS through the Columbia CC property and golf course. A color copy of one of these drawings, showing the DEIS alignment with aerial mapping, is appended hereto as Attachment B.

In addition, on December 9, 2008, I visually inspected the entire Purple Line light rail right-of-way alignment (as presented in the DEIS route alignment diagrams for the High Investment and Medium Investment Alternatives) and the properties and structures on either side of the proposed right of way over its entire distance, except for a few areas east of Silver Spring that were inaccessible by automobile (these

¹ I understand that the MTA's preferred alternatives for the Purple Line are the High Investment LRT and Medium Investment LRT alternatives.

involved areas of tunnels or cut-and-cover as proposed by MTA). The inspection was conducted on foot and via modified ATV between Bethesda and Silver Spring, and via automobile and on foot in Silver Spring itself and between Silver Spring and New Carrollton.

A number of photographs of the LRT route were taken at my direction during the course of my December 9, 2008 site inspection. Representative photographs are included in Attachment C to my Report. I will refer to several individual photographs later in my Report.

II. SUMMARY AND CONCLUSIONS

My review of the DEIS and the documents described above, together with my field inspection, indicates that the LRT project is extremely problematic from a safety standpoint, especially along the CSXT tracks in Silver Spring and between Silver Spring and Bethesda, where there are numerous homes and apartment buildings that will be within 100 feet of the LRT tracks and two day care centers with playground/yards whose fences will be only about 15 feet from the track. In addition, a total of at least 2,000 mature trees will probably have to be removed to make room for the LRT tracks and the trail west of Silver Spring.

The LRT project as proposed by MTA will render parts of the historic Columbia CC golf course unplayable during the lengthy construction period, and the proposed alignment per the DEIS will require permanent and significant alteration of parts of at least three holes. The present character of the golf course, which has a quiet, pastoral setting that is well-integrated with the present trail (which is used only by pedestrians and bicyclists and on which motorized vehicles are not allowed) will be permanently ruined by noisy LRT vehicles that will operate through the

golf course at headways (intervals) of only six minutes during peak hours and 10 minutes during off-peak hours. The close proximity of the LRT tracks to the trail through the Columbia CC property and proceeding east to Silver Spring also presents safety issues given the frequent passage of LRT vehicles operating at design speeds of 35 to 45 miles per hour.

There are also significant safety issues in Silver Spring, where the LRT alignment closely parallels the busy CSXT main line for a distance of 1.12 miles. The CSXT paired tracks adjacent to the LRT tracks carry an average of 30 freight and 24 Amtrak and MARC passenger trains per day on weekdays, and MTA's proposal for a fence between the CSXT and LRT tracks is inadequate. Based on my experience CSXT is likely to require a crash wall between its tracks and the LRT tracks since the separation between them will be substantially less than 50 feet. This would sever the LRT tracks from the CSXT tracks in terms of the possibility of restoring freight service on the Georgetown Branch right-of-way in the future.

East of Silver Spring, the proposed LRT alignment tunnels under Silver Spring streets for about 1.4 miles under the High Investment alternative, and follows busy streets at grade under the Medium (and Low) Investment alternative. The alignment for both alternatives then follows city, county and state roads at grade level for most of the remainder of the route to New Carrollton, except it would use a 1200-foot tunnel under Plymouth Street and part of the route along Arliss Street in eastern Silver Spring. The Low Investment alternative follow Plymouth and Arliss Streets entirely at grade; these are relatively narrow and busy streets, with numerous buildings including apartment buildings, homes, schools and churches within 100 feet on either side of the tracks. Even under the Medium and High Investment alternatives, the alignment uses busy streets

and will cause a significant increase in traffic congestion assuming traffic signals are coordinated with the LRT vehicle movements. The safety issues on this part of the route are quite significant.

In the remainder of my Report I will explain the basis for the conclusions set forth above. I will divide the discussion into five relatively discrete segments of the proposed Purple Line LRT route, proceeding from west to east: Bethesda to the beginning of the Columbia CC property; the Columbia CC property and golf course; the east line of the Columbia CC property to the end of the present trail on the northwest edge of Silver Spring; the alignment along the CSXT tracks in Silver Spring; and the route between Silver Spring and New Carrollton.

III. PROBLEMS WITH THE LRT ROUTE AND ALIGNMENT AS PROPOSED BY MTA IN THE DEIS

A. Bethesda to Columbia Country Club

For approximately 600 feet beginning at the westerly LRT terminus near Woodmont Avenue in Bethesda, the proposed LRT alignment and the Georgetown Branch trail traverse a tunnel under Wisconsin Avenue and the Air Rights Building. After emerging from the tunnel, the trail crosses the two LRT tracks from the south to the north side via an overhead bridge and then parallels the LRT tracks at grade eastward for about 2/3 mile to the westerly edge of the Columbia CC property.

The MTA has acknowledged the desirability of a 25-foot separation between the Georgetown Branch trail and the closest LRT track from a safety standpoint. The U.S. Department of Transportation also recommends a 25-foot separation between the edge of a pedestrian trail

and the centerline of the nearest track, where feasible.² However, for virtually the entire proposed LRT alignment between the east portal of the tunnel in Bethesda through the Columbia CC property to Silver Spring, the closest edge of the trail is to be separated from the centerline of the closest adjacent LRT track by only 20 feet (11 feet from the edge of the trail to the proposed fence between the trail and the LRT tracks, and 9 feet from the fence to the centerline of the closest LRT track). Although the trail is elevated by about 3-4 feet above the level of the LRT tracks, this is an inadequate horizontal distance given the minimal protection provided by the proposed wire mesh fence between the trail and the LRT tracks. The 25-foot separation recommended by the U.S. DOT and by Maryland government entities would lessen the risk that LRT vehicles would land on the trail and injure or kill people in the event of a derailment, compared with MTA's proposed 20-foot separation.

There are a total of 7 commercial and 88 residential or mixed residential/commercial buildings within 100 feet of the proposed LRT tracks between the tunnel portal in Bethesda and the westerly boundary of the Columbia CC property, of which at least 26 buildings are located within

² See *Rails-with-Trails: Lessons Learned* (Review of Current Practices), August 2002. In its February 2008 Master Plan Alignment for the Georgetown Branch trail and the LRT alternatives, the MTA recognized that the recommended design guidelines in *Rails-with-Trails: Lessons Learned should be followed*, and that the desired goal was a set back of 25 feet between the centerline of the nearest LRT track to the edge of the trail. However, the trail and LRT designs and alignments proposed in the DEIS do not follow MTA's own recommendations.

Recent public testimony by the Capital Crescent Trail Board recommended a 12-foot trail width with two feet of gravel on either side, and noted that MTA had indicated that 12-foot wide paved path would be safer than the narrower, 10-foot path proposed in the DEIS. If the increased width is adopted, the distance to the centerline of the nearest LRT track may have to be decreased to keep the entire trail/transitway within the existing 100-foot right of way.

50 feet of the proposed LRT tracks. Photographs 3 through 9 in Attachment C to my Report show some of these buildings. These buildings include single-family houses, residential apartment buildings, and two daycare centers. The southerly edges of the two daycare buildings are only about 30 feet from edge of the current trail, which is where the northerly of the two LRT tracks will be located under all three LRT alternatives. The outdoor children's playground areas behind the daycare centers, which are separated from the trail only by four-foot wire mesh fences, come within approximately 15 feet of the present trail and thus the closest proposed LRT track.³ While the proposed trail alignment would serve as something of a buffer between the LRT tracks and the daycare buildings and playground areas, the safety issues involving LRT operations in this area at speeds of 45 to 50 miles per hour at intervals of six to ten minutes are obvious.

It has long been recognized that railroad and rapid transit operations are an attractive nuisance for children who have been known to climb fences separating their yards and play areas from railroad/transit tracks with disastrous consequences when they are struck by passing trains. In addition to the two daycare centers, there are many residences whose yards abut the right-of way for the proposed LRT tracks, both east and west of the Columbia CC property. The danger of children climbing the fence separating their play areas from the LRT tracks and trail, and getting injured or killed by LRT vehicles, is particularly acute given the frequency of LRT vehicle movements (every six minutes in each direction

³ These daycare centers are the Childtime Children's Center at 4550 Montgomery Avenue, Bethesda, and the Family Academy at 4324 Montgomery Avenue, Bethesda. The daycare buildings and outdoor play areas are shown in Photo Nos. __ through __ in Attachment C.

during peak hours and every ten minutes in each direction during other periods).

The DEIS ignores another safety issue related to the portion of the proposed LRT and trail between Bethesda and Columbia CC. This issue involves the proposed at-grade pedestrian access path to the trail from the south side of the LRT tracks, near Lynn Drive in Bethesda, about 300 feet west of the bridge carrying East-West Highway/Route 410 over the LRT tracks and trail (the realigned trail would be on the north side of the LRT tracks at this location). Two schools are located to the north near the LRT/trail route in this area, Bethesda-Chevy Chase High School and Our Lady of Lourdes Elementary School, and it is likely that this access-path crossing will be used by schoolchildren on a daily basis. The DEIS does not indicate whether any crossing protection devices are to be provided at this location, but even if they are, my experience is that children of all ages frequently ignore them and scamper across the tracks to "beat" oncoming trains. This presents a significant safety issue for children and other pedestrians using this access path with its dangerous grade crossing of the LRT tracks.

I would also note that there are numerous trees, shrubs and vines on the current right-of-way within 15-30 feet of the trail that would have to be removed to accommodate construction. In fact, during my December 9, 2008 site visit I observed more than 2,000 mature trees between Bethesda and the end of the trail in Silver Spring that had metal tags – presumably meaning they will have to be removed to accommodate the LRT/trail project. This will completely alter the current esthetics of the trail.

B. Columbia Country Club/Golf Course

The proposed LRT alignment traverses approximately 2700 feet of the Columbia CC property. The alignment, which is shown from the current trail in Photo Nos. 11-17 in Attachment C, bisects the golf course between the first and second holes near the westerly boundary of the Club's property, and between hole 14 and holes 15, 17 and 18 near the easterly boundary of the Club's property.

The LRT tracks and realigned trail would have a significant physical impact on the golf course, as shown in Attachments B and C. In particular, the area of disturbance in the area between the 14th green on the north side of the alignment and the 15th tee, 17th green and 18th tee on the south side of the alignment (outlined in blue color) would destroy the two men's tee boxes for the 15th hole, the back tee box on the 18th hole, and encroach within three to five feet of the 17th green. In addition to preventing access between the north and south sides of the LRT tracks and trail during the approximately one-year construction period and rendering the tees for the 15th and 18th holes unplayable, it is a virtual certainty that the 17th green (and quite possibly the 14th green on the north side of the LRT right-of-way) will be unplayable during the construction period. Finally, many trees, shrubs and vines of various sizes within the present trail right of way, which shield the golf course from the trail and contribute to the esthetics of both, will have to be removed to accommodate construction.

After construction is completed, the tee boxes on the 15th and 18th holes will have to be relocated, shortening these holes from their current configuration which I understand has existed for well over 50 years, and the fence separating the LRT tracks from the 17th green will encroach

within 15 feet of the edge of the 17th green. This will destroy the physical layout of these holes forever. It will also severely alter the character and esthetics of the golf course, which contribute to its historic nature.

Instead of a quiet, pastoral setting in which pedestrian and cycling trail users co-exist with golfers in a tree-lined area, the setting will be disrupted frequently (at intervals of only six minutes during peak hours) by the passage of noisy, visually-disturbing LRT vehicles moving at design speeds of 35 to 45 miles per hour. Based on my experience the noise impacts will be significant due to the quiet nature of the surroundings and activities, which I observed between 9:00 and 11:00 AM on December 9th, even without the inevitable squeaks and squeals that accompany steel wheels on steel rails particularly on curves and in transition areas between at-grade level and elevated structures. The proposed LRT alignment through the Columbia CC golf course occupies a curve over most of its distance, and squeaky LRT wheels are inevitable every time a train passes.⁴ The noise and visual problems will be particularly acute for golfers on the first green, second hole in its entirety, third tee, fourteenth green, 15th through 17th holes, and 18th tee, all of which are relatively close in proximity to the proposed LRT alignment.

I do not believe any minor alteration of the LRT alignment through the Columbia CC golf course in the area between the 14th green and 15th tee/17th green/18th tee is capable of rectifying the situation described above. Shifting the alignment a little to the north to avoid disturbing the 15th and 18th tee boxes and the 17th green would likely impact the 14th

⁴The curve for the LRT track alignment in this area has a 3800-foot radius. The LRT tracks will leave grade level and transition onto the proposed bridge over Connecticut Avenue on Columbia CC property, adjacent to the 18th tee, and squeaks are inevitable in this area as well.

green. Short of tunneling under the present trail alignment in this area, which would be very expensive, the impacts of the LRT alternatives do not appear to be avoidable.

C. Easterly boundary of Columbia CC to Silver Spring

East of the Columbia CC property line, the proposed LRT alignment occupies the present Georgetown Branch Trail alignment (and will continue to parallel the trail) for about two miles until the trail ends as a separate entity at Stewart Avenue in Silver Spring (users of the trail must use city streets to get from Stewart Avenue to downtown Silver Spring). The proposed High Investment and Medium Investment LRT alternatives cross two busy roads, Connecticut Avenue and Jones Mill Road, by means of grade separations.

Under the Low Investment LRT alternative, the Purple Line and trail would continue to cross Connecticut Avenue at grade, as the trail does now. I have driven on this part of Connecticut Avenue during rush hour, and it is highly congested with southbound morning rush-hour traffic (for example) often backed up for most of the distance between the Capital Beltway (I-495) and East-West Highway (Route 410). A LRT station is planned for the east side of Connecticut Avenue, and the additional traffic congestion that would be caused by the addition of LRT vehicles crossing Connecticut Avenue at grade at slow speeds every six minutes is mind-boggling to contemplate. Crossing accidents involving LRT trains and vehicular traffic on Connecticut Avenue would also be likely.

Over the 600-foot distance between the Columbia CC property line and Connecticut Avenue, there are five large multi-family apartment buildings and one commercial building within 100 feet of the proposed LRT alignment. Between Connecticut Avenue and Jones Mill Road there are 51

buildings within 150 feet of the current trail. These include multi-family and single-family residences and commercial buildings; several of the commercial buildings are as close as 25-30 feet from the trail. From Jones Mill Road to Stewart Avenue 12 residential buildings appear to have property lines less than 100 feet from the trail, and 12 commercial buildings of varying sizes are located within 100 feet of the trail. Several of the commercial buildings between Lyttonsville Place and Stewart Avenue come within 25-30 feet of the trail. These buildings probably will have to be removed to accommodate the proposed new LRT and trail alignment.

East of Jones Mill Road, the trail/transitway alignment crosses over Rock Creek. The current trail bridge will have to be replaced to accommodate LRT vehicles, and new bridges are planned for both the LRT tracks and the re-aligned trail. The present trail right-of-way east of Jones Bridge Road is occupied by hundreds of mature trees which in many instances are within 10-20 feet of the edge of the trail. These trees will have to be removed to accommodate the proposed new trail and LRT alignment.

D. CSXT Tracks in the Silver Spring Area

The proposed LRT alignment joins and parallels the CSXT Metropolitan Branch mainline tracks near the intersection of Talbot and Kansas Avenues in Silver Spring. The LRT tracks continue along the south side of the CSXT tracks for approximately 1.12 miles, but the proposed trail alignment crosses the CSXT tracks by means of a pedestrian bridge just east of Lanier Avenue and then parallels the CSXT tracks on the north side until it reaches the downtown Silver Spring Metro station.

Based on the drawings accompanying the EIS, it appears that both the trail and the LRT tracks will occupy part of CSXT's right-of-way west of the 16th Street overpass. East of that point, it appears that the LRT tracks will be just outside the CSXT right-of-way, as denoted by the current fence along the eastbound (southerly) main track, but it appears the centerline of the closest LRT track will be no more than 20-25 feet from the centerline of the closest CSXT track. Photo Nos. 24-26 in Attachment C show this area; these photos were taken from either side of the Spring Street Bridge over the CSXT and Metro Red Line tracks.

Photo No. 25, in particular, provides a good view of the eastbound CSXT main track (toward the right side of the picture) looking east toward the Silver Spring Metro and MARC/Amtrak passenger stations.⁵ The fence between the eastbound CSXT main track and the parking area probably denotes the CSXT right-of-way boundary, and the LRT tracks will be located just to the south (right in the photo) of the CSXT track.

Photo No. 26 shows the area where a bridge is proposed to carry the LRT tracks over the CSXT and Metro tracks to the north side (and the proposed Silver Spring Transit Center) will start. Part of the first group of buildings on the right will have to be removed to make room for this bridge. It is my understanding that MTA cannot condemn any part of CSXT's right of way, including air rights for an overhead bridge crossing, and that CSXT will have to agree to any use of its right-of-way by both the LRT tracks and the trail.

⁵ It should be noted that the two CSXT main tracks are outside the Metro tracks, which include a pocket track for reversing the direction of Metro trains. The tracks were configured this way to enable CSXT to perform switching at industries on either side of the tracks in the Silver Spring area. The Metro tracks are separated from the CSXT tracks by crash walls.

Serious safety issues are presented by having LRT tracks in such close proximity to busy mainline railroad tracks in Silver Spring, as shown in Photo Nos. 24-26. CSXT operates a daily average of about 20 freight trains, 22 MARC trains, and two Amtrak trains through Silver Spring, at speeds of up to 60 miles per hour for passenger trains and 30 miles per hour for freight trains.⁶ Half of these trains will use the eastbound main track which will closely parallel the LRT tracks. I can testify from my own experience at CSXT, and with other similar situations involving adjacent freight and heavy or light rail passenger operations, that CSXT is unlikely to accommodate the proposed LRT alignment in this area unless a heavy crash wall is installed between its track and the nearest LRT track.

Crash walls are designed to prevent 200-ton locomotives and 150-ton railcars from leaving the railroad right-of-way in the event of a derailment, and to prevent LRT vehicles from fouling the railroad's tracks if they derail. They are normally required in these situations unless the centerlines of the railroad and LRT or heavy rail tracks are at least 50 feet apart. Otherwise, there could be significant potential liability if, for example, a freight train were to derail and the cars (or locomotives) topple onto the LRT tracks or into the path of oncoming LRT vehicles.

As noted above, there are presently crash walls between the CSXT tracks and the interior Metro tracks in this area. However, none of MTA's proposed LRT alignments include a crash wall between the southerly CSXT track and the northerly LRT track.

Installation of such a crash wall would permanently sever the Georgetown Branch right-of-way from the existing CSXT tracks. This

⁶The proposed LRT alignment will begin to parallel the CSXT tracks west of Georgetown Junction. Maximum CSXT train speeds west of Georgetown Junction are 70 mph for passenger trains and 55 mph for freight trains.

would make it impossible, without enormous expense, to re-establish a connection between CSXT and the former Georgetown Branch right-of-way for purposes of a potential future restoration of rail freight service on the latter. Even without a crash wall, modern railroad freight equipment could not be operated over LRT tracks with a standard overhead catenary design and the kind of station platforms proposed in the DEIS, which are incompatible with standard railroad boxcar width.

E. Silver Spring to New Carrollton

The proposed LRT route between the proposed Silver Spring Transit Center and New Carrollton, a total distance of about 12.2 miles, largely uses existing streets and roads at grade. Under the High Investment LRT proposal, the tracks would be in a tunnel below ground level for the first 1.4 miles east of downtown Silver Spring, and would return to grade level on Wayne Avenue at Cedar Street. Under the Medium and Low Investment LRT alternatives, the LRT tracks would leave the CSXT right-of-way at Bonifant Street and follow city streets at grade to Wayne Avenue. The LRT tracks would then proceed for just over one mile at grade along the center of Wayne Avenue, which would have to be widened to accommodate the tracks. Under all three alternatives the LRT alignment would enter a tunnel after Manchester Place and continuing under Plymouth Street, emerging at grade on Arliss Avenue about 1,000 feet before reaching the intersection of Arliss and Piney Branch Road, then turning to the east along Piney Branch Road. Except for one area in the University of Maryland campus in College Park, the alignment follows existing roads at grade all the way east to New Carrollton.

There are a number of apartment buildings, single-family houses, churches and schools within 100 to 150 feet of the proposed LRT

alignment where it follows existing streets at grade. Examples are shown in Photo Nos. 27-30 in Attachment C, which show the location of the LRT tracks at intersection of Wayne Avenue and Manchester Road, along Arliss Avenue, and at the intersection of Arliss Avenue and Piney Branch Road in Silver Spring/Takoma Park.

The principal issue with the proposed LRT alignment east of Silver Spring is the significant increase in vehicular traffic congestion caused by LRT vehicles traveling in the middle of busy roads, and occasionally making sharp, 90-degree turns to get from one road to another. Safety issues are implicated as well, because cars and trucks have to co-exist with heavier LRT vehicles using the same corridors. In such situations the normal practice is to set the traffic signals at all signaled intersections that would be crossed or used by LRT in a manner that gives priority to the LRT vehicles. This increases traffic congestion and driver impatience, which can lead to an increased frequency of vehicular accidents.

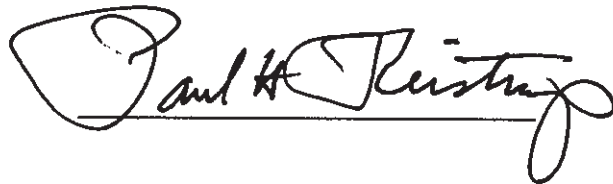
VERIFICATION

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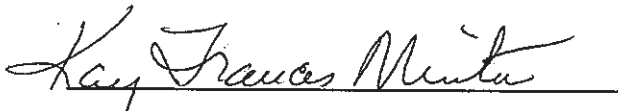
OF) ss:

COLUMBIA)

I, Paul H. Reistrup, verify under penalty of perjury that I have read the foregoing Report including Attachments A, B and C thereto and know the contents thereof, and that the same are true as stated to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 6th day of January, 2009.



Notary Public

My Commission expires: 1/1/2014

Biographical Profile

Date of Employment by CSX (or predecessor): July 1, 1997

Place of Birth: Sioux City, Iowa

Education: B.S., Engineering, United States Military Academy
West Point, New York 1954

Chronology of Employment:

- 1959 to 1961 **Assistant Division Engineer, Baltimore and Ohio Railroad**
Infrastructure maintenance including track, bridges, signals and buildings on a mountain territory and later on high speed Division between New Castle, PA and Pine Jct., Chicago, Illinois.
- 1961 **General Yardmaster, Baltimore and Ohio Railroad**
In charge of 1000 car classification yard at Fairport Harbor, Ohio, serving coal transshipment to Lake boats, grain processors and chemical customers. Supervised around the clock yardmasters and switch engines.
- 1961 to 1963 **Trainmaster, Baltimore and Ohio Railroad**
Pittsburgh, PA headquarters for territory between Cumberland, MD and New Castle, PA plus line to Wheeling, WV. Supervised train crews of coal, merchandise, intermodal and passenger (including commuter) trains over generally mountain territory.
- 1963 **Superintendent of Car Utilization and Distribution**
In charge of system distribution of some 60,000 freight cars consistent with ICC regulations. Responsibility included passenger train movement orders and related assignment of coach, sleeper, diner, RPO, mail and express cars.
- 1964 to 1966 **Director of Passenger Service, B&O/C&O Railroad**
Selected to head restructured passenger department to include pricing/marketing, operations, mail, express and dining services. Became joint C&O Railway after control when responsibility expanded to include dining and cabin (sleeping room) service on three cross lake car ferry routes.
- 1966 to 1967 **Assistant to Vice-President-Executive Department, B&O/C&O Railroad**
Selected by Railroad President to be groomed for key positions in Coal Department. During process traveled to all C&O/B&O mine loading locations that produced more than 1000 tons per day, numbering more than 100 operations in total.
- 1967 to 1968 **Vice-President—Passenger Services, Illinois Central Railroad**
Elected to form integrated operations, marketing, pricing, mail and express, dining and commuter department. Task was to reduce intercity trains by one half and implement improvement program on electrified Chicago commuter operation to include funding and replacement of 40 year old equipment on 215 trains. Goal achieved in 18 months to meet commitment.
- 1969 to 1970 **Vice-President—Intermodal Service, Illinois Central Railroad**
Formed new department to develop emerging intermodal business of truck trailers and containers on flatcars. Initiated very commercially successful dedicated intermodal trains on passenger train schedules and led construction of four new intermodal terminals (exchanges) known as "IMX".
- 1970 to 1975 **Senior Vice-President—Traffic, Illinois Central Railroad**

Responsible for all freight revenue, sales, marketing, pricing, coal traffic and Industrial Development. Continued to be in charge of intermodal as that department was consolidated. Elected to ICRR Board of Directors.

1975 to 1978

President and CEO, Amtrak

Elected in Jan. 1975 to become Amtrak's second President and CEO. The operation then can best be described as horrible. Made it safe, led huge acquisition of equipment, selected locomotives that stayed on the track and against formidable opposition achieved acquisition of the most important element—The Northeast Corridor. Shared Penn Station and New York City with Long Island RR and began an enduring relationship with Commuter Agencies, including MBTA, Metro North, what became Jersey Transit, SEPTA and MARC. Presided over all related labor union related transitions.

1978 to 1988

Vice-President R.L. Banks & Associates

Number Two in the Firm during the period of fuel "panic" and resulting switch from oil to coal power plants. As Project Manager, led the Firm's effort on pre-feasibility study of proposed new light rail line in Baltimore, using former freight rail lines toward BWI Airport and "Northern Conrail" line toward Timonium, MD. Made feasibility presentation to MTA on 25 February 1987. (The Baltimore project was constructed and has been a resounding success.)

1988 to 1992

President, Monongahela Railway Company

Subsequent to a six year marketing role as acting Chief Traffic Officer under contract with RLBA was elected as President and CEO of CSX/CR//PLE owned heavy haul coal railroad. Tonnage tripled during 10 year role as chief coal marketing officer. Two new mines opened subsequent to convincing coal operators output could (and was) flow effective. Role ended as President of a Conrail subsidiary.

1992 to 1994

General Manager, Railroad Development Corporation

Led Argentina through safe transition from government railroad to commercial enterprise of some 5000 miles. Startup was fully automated to U.S. safety standards since remaining employees had tenure for life.

1994 to 1997

Vice-President, Parsons Brinckerhoff

Initially engaged to lead PB'S international rail effort because of the successful Argentina endeavor. Trained senior management (Chairman, VC, General Managers) of new Cairo, Egypt subway as experienced railway managers to lead subway constructed to BART (San Francisco) and Washington, DC Metro Rail automated standards. Resulting transition was safe.

1997 to 2002

Vice-President—Passenger Integration, CSX Transportation, Wash., DC

Was requested to rejoin CSX "family" to support Conrail integration of passenger with freight. Critical focus was NEC and the multitude of commuter rail interfaces plus Amtrak as CSX was the largest operator by number of trains and train miles. Participated in negotiations with Conrail co-owner Norfolk Southern, New Jersey DOT and New Jersey Transit if furthering commuter rail service on Hudson Bergen line (freight traffic was diverted to parallel route. In similar partnership, was deeply involved in pursuit of diesel light rail from Trenton, NJ toward the New Jersey "Chemical Coast" on Conrail secondary line. Because of vital safety concerns by CSX top executives, was dispatched to observe and describe parallel freight/light rail lines in St. Louis and Denver. At this time CSX also became concerned with the proposed Inner Purple Line and its interface with CSX tracks in the Silver Spring area.

2003

Consultant, CSX

From retirement from CSX to 31 Aug 2003 served CSX to introduce chosen successors to all passenger entity key players. Smooth transition was the goal.

2003 to present

President, Paul H. Reistrup & Associates

Consultant on rail/light rail matters on hourly fee basis. No retainer cash fee.

Business, Civic and Professional Affiliations

Transportation Research Board

Appointed Member Emeritus—2001

Chair—Committee AR030, Railroad Operating Technologies through 2006

American Railway Engineering and Maintenance Association (AREMA)

Association of Railway Superintendents

Board Member—J. W. Barriger III Library through 2005

Lexington Group (Railroad History)

Association of Transportation Law Professionals



ATTACHMENT C

REPRESENTATIVE PHOTOGRAPHS OF PURPLE LINE ROUTE (LRT ALTERNATIVES) TAKEN DECEMBER 9, 2008

<u>Photo No.</u>	<u>Description</u>
1	Looking west at portal of tunnel taking trail under Air Rights Building toward Woodmont Ave, Bethesda
2	Looking east along trail from portal of tunnel under Air Rights Building, Bethesda
3	Looking northwest from trail at apartment/commercial buildings in the eastern part of Bethesda
4	Looking east along trail at daycare center building and playground on north side of trail – wire fence is only 15 feet from edge of trail; white buildings in background are apartments/residences within 75 feet of trail
5	Looking east toward overhead bridge carrying Route 410 (East-West Highway) over trail in eastern Bethesda; shows large apartment building within 30 feet of trail
6	Looking west along trail to the Route 410 overpass
7	Looking northwest from trail east of Bethesda at mature trees and residence within 50 feet of trail – trees will have to be removed to accommodate realigned trail and LRT tracks
8	Looking east along trail between Route 410 and Columbia CC – note pastoral setting and many trees/bushes that will have to be removed.
9	Looking northeast from trail at residence within 75 feet of trail
10	Looking east from trail near west edge of Columbia CC property – No. 1 green is on the right, exit area from cart underpass toward No. 2 tee is on the left
11	Looking north from trail where it crosses the cart underpass Between the No. 1 green and No. 2 tee, toward the No. 2 tee

<u>Photo No.</u>	<u>Description</u>
12	Looking southwest from trail at front tees on 15 th hole and 17 th green
13	Looking east from trail at 17 th green
14	Looking southeast from trail at cart path/maintenance road and 17 th green
15	Looking southeast from trail at area between the 17 th green and 18 th tee
16	Looking northeast from trail near 14 th green toward east boundary of Columbia CC property
17	Looking west from trail toward east boundary of Columbia CC Property
18	Looking northeast from trail between Columbia CC property and Connecticut Ave. at multi-family dwellings within 100 feet of trail
19	Looking east along trail at grade crossing of Connecticut Ave.
20	Looking northeast across Connecticut Ave. from crosswalk for trail – trail entrance east of Connecticut is just left of green signs for Manor Road and Jones Bridge Road
21	Looking north from trail between Connecticut Ave. and Jones Mill Road; houses are within 150 feet of trail
22	Looking northeast from trail between Connecticut Ave. and Jones Mill Road; note residences within 100 feet of trail and numerous trees to be removed
23	Looking east along trail where it crosses Jones Mill Road at grade
24	Looking west along CSXT and Metro Red Line tracks from bridge over Spring St. in Silver Spring – CSXT tracks are the two outside tracks, LRT tracks will be to left of the CSXT track on the left
25	Looking east along CSXT and Metro Red Line tracks from Bridge over Spring St. in Silver Spring –LRT tracks will be to right of the outside (CSXT) track on the right

<u>Photo No.</u>	<u>Description</u>
26	Close-up looking east from Spring St. Bridge in Silver Spring at area where bridge will carry the LRT tracks over the CSXT and Metro tracks from the south (right) side to the north (left) side
27	Looking east along Wayne Ave. at intersection of Wayne and Manchester Road; LRRT tracks will be at grade in middle of Wayne Ave. at this location
28	Looking east along Wayne Ave. (toward downtown Silver Spring) from same location as Photo 30
29	Looking northwest from Arliss Street near location where the LRT tracks will emerge from tunnel under Plymouth Street and part of Arliss Street in Silver Spring
30	Looking north along Arliss Street from intersection of Arliss and Piney Branch Road – LRT tracks will be at grade in middle of street at this location and will make a 90-degree left turn onto Piney Branch Road to continue east toward College Park



Photo No. 1



Photo No. 2



Photo No. 3



Photo No. 4



Photo No. 5



Photo No. 6





Photo No. 8



Photo No. 9



Photo No. 10



Photo No. 11





Photo No. 14





Photo No. 16



Photo No. 17



Photo No. 18



Photo No. 19

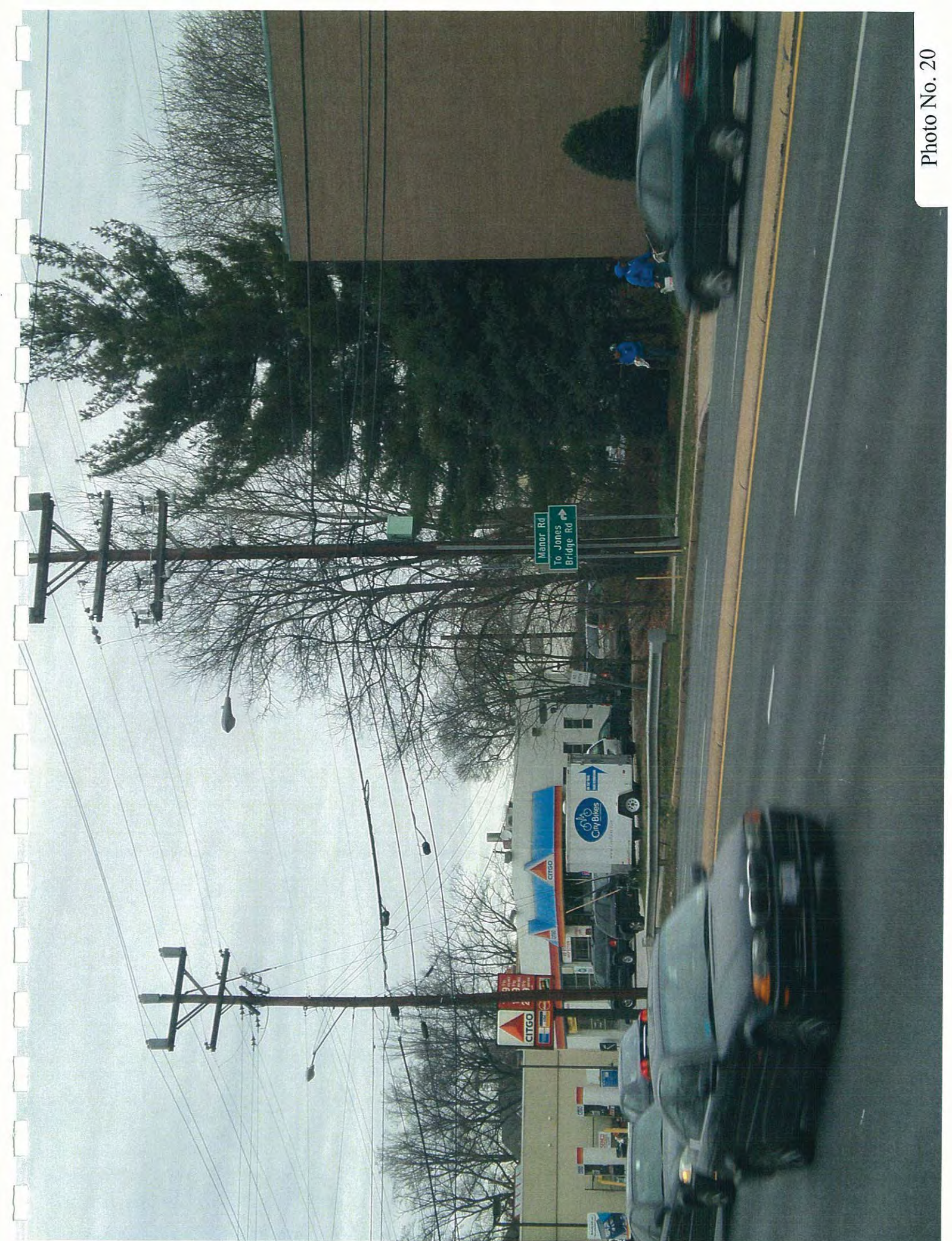




Photo No. 21



Photo No. 22



Photo No. 23



Photo No. 24



Photo No. 25





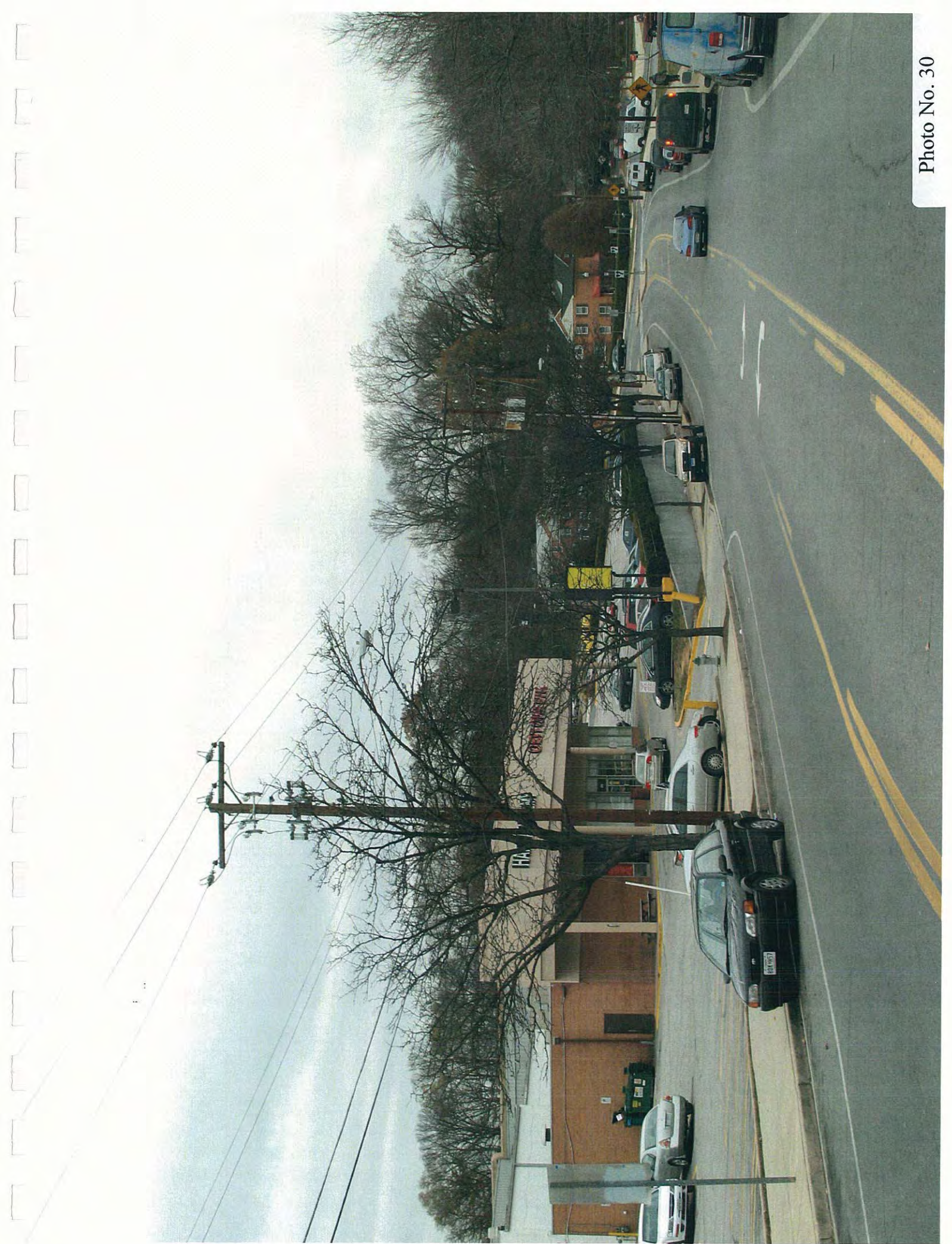
Photo No. 27



Photo No. 28



Photo No. 29



VERIFIED STATEMENT OF STEPHEN G. THORNHILL

My name is Stephen (Steve) G. Thornhill. I am an Associate Project Manager for the Environmental Studies and Permitting Global Practice at Burns & McDonnell Engineering Company, Inc. My business address is P.O. Box 419173, Kansas City, Missouri, 64141 and my office headquarters is located at 9400 Ward Parkway in Kansas City, Missouri.

I graduated from Avila College in 1987 with a Bachelor of Science Degree in Biology. I obtained a Masters of Science Degree in Biology from Southwest Missouri State University in 1990. I joined the company in August of 1990 in the Planning and Environmental Analysis Division, now the Environmental Studies and Permitting Global Practice. I have nearly 19 years experience on a variety of projects and in various environmental roles. I have extensive experience in routing and environmental studies for new linear facilities projects, particularly rail lines and electrical transmission lines. I have participated in and served as project manager for a number of linear facilities environmental impact statements and environmental assessment studies throughout the country ranging from only a few miles in length to over 100 miles.

I was requested by Columbia Country Club to review the assessment of noise, vibration and visual components in the Purple Line Alternatives Analysis/Draft Environmental Impact Statement ("AA/DEIS"). For this task, I

reviewed the AA/DEIS itself, the Noise and Vibration Technical Report and the Socioeconomic Technical Report.

NOISE

The AA/DEIS generally presents a brief summary of the information contained in the Noise and Vibration Technical Report. Overall, the AA/DEIS indicates the project will have little if any adverse noise impacts. However, it is not possible to verify the data and information presented on noise levels in the Technical Report based on the information it contains. The Report presents information on the location of noise monitoring stations and many of the parameters used in the noise propagation and attenuation analysis, such as train speed and length. However, it does not include information such as noise levels for individual trains or the number of passing train events used in each of the calculations. A value of 82 dBA was included for rail cars but it is unclear as to the basis for this noise level or if it is even applicable to the types of trains and the operations proposed as part of this project. Formulas used in calculating projected noise levels under various levels of train traffic and at varying distances from the rail line are likewise absent.

In order to assess whether the noise analyses set forth in the AA/DEIS reach valid results, additional information must be provided, including:

- Source and applicability of noise level used for rail cars. It would be appropriate to conduct field measurements of actual, operating trains

similar to those contemplated for this project in order to use actual, real-world data.

- Number of train events associated with each level of noise projected.
- Formulas or models used to develop the projected noise levels. All inputs, parameters and constants in these formulas should be provided and defined.

Throughout the report, noise level and projection data are mixed between the use of hourly Leq, representing a peak hour level of noise, and the cumulative day-night measure of noise levels, Ldn. These units differ greatly in the means by which they characterize noise at a particular location. The mixing of these units of noise measure in the data presentation is thereby both confusing and misleading. The use of Ldn is the standard for presentation of noise impacts and should be used consistently for the characterization and assessment of noise levels associated with this project.

VIBRATION

In much the same fashion as for noise, the AA/DEIS presents a cursory summary of the potential vibration impacts anticipated as a result of the proposed project with the analysis of vibration contained largely in the Noise and Vibration Technical Report. As with the noise analysis, it is not possible to verify the vibration analysis contained in this report due to the lack of information necessary to support the conclusions and finding of the report. It appears from the

report that vibration analysis was performed for airborne vibration. However, no analysis of ground-transferred vibration was conducted.

Information that should be provided in the technical report includes:

- Source and applicability of vibration level used for rail cars, both airborne and ground levels. It would be appropriate to conduct field measurements of actual, operating trains similar to those contemplated for this project in order to obtain actual vibration levels for use in the analysis.
- Number of train events associated with each level of vibration projected.
- Formulas or models used to develop the projected vibration levels. All inputs, parameters and constants in these formulas should be provided and defined.
- Soils and geology data and characteristics along the rail as the properties of these strata are the primary determinants of how much and how far vibration is propagated through the ground to nearby receptors.

VISIBILITY

The visibility analysis is contained within the AA/DEIS itself, largely in Chapter 4 where the visual nature of the areas along the alternatives are described, photographs of the areas presented, and an assessment of the visual

quality of each area and the potential project effects provided. No technical report on visibility was provided, although a brief discussion of visibility issues was contained in a portion of the Socioeconomic Technical Report.

No established visual assessment methodology or protocol was noted as being used for the visual assessment process. Therefore, no standards or benchmarks for comparison are presented to verify the appropriateness of the visual characterizations, either low, medium, or high sensitivity, utilized in the AA/EIS. Additionally, there are no established measuring criteria to verify the conclusions of the visual assessment. While the report presents photographs of various locations along the alternative routes, no simulations of the project's appearance are presented for these locations to provide the reader a perspective on how the project would appear following construction. Of particular interest would be simulations of those areas, including the Georgetown Branch right-of-way, where significant clearing of mature trees would occur in areas of high visual sensitivity and for areas where infrastructure improvements, such as bridges, would be constructed or renovated. Absent such simulations, it is not possible to assess the degree of visual change and contrast that would be introduced by the proposed project.

The absence of simulations may relate to the absence of designs or plans for what actually will be constructed as part of this project. As noted in the Draft EIS, Chapter 4, "No specific design decisions (i.e., construction materials, structures, shelters, colors, brand of vehicles, etc.) have been made". Without

knowing what is to be built where and what it looks like, a valid assessment of the potential visual contrast that would be introduced into the landscape is not possible.

Much of the conclusion that the project would have little visual impact appears to be based on the statement that many of these areas “were served by streetcar lines as late as the 1950’s”. While this may be the case, it is difficult to imagine that the visual character of these areas has not changed in the over 40 years since cessation of streetcar operations. Certainly after nearly a generation, the residents and citizens of these areas have little if any connection to the days of streetcar operations and the visual assessment should evaluate the changes based on current conditions, not previous activities which have been largely absorbed from view into the landscape.

It is also difficult to assess the statement in the AA/DEIS that the project “has the potential to enhance areas of low visual quality.” As with the overall visual characterization and assessment, absent established standards or methods, it is not possible to verify either the visual sensitivities presented in the AA/DEIS or the resulting visual character created by the project.

GEORGETOWN BRANCH RIGHT-OF-WAY

The Georgetown Branch right-of-way is now used as hiker-biker trail. Before that, CCC informs me, it was a little used freight line, over which, on average, only one train a day, and later, only one train a week moved. While, as

discussed above, it is impossible to verify the calculations set forth in the AA/DEIS concerning the noise, vibration and visibility impacts associated with routing the Purple Line along this right-of-way, there is no doubt that the addition of the Purple Line will add more noise and vibration along this corridor than it has historically experienced as well as substantially altering the current park-like visual setting by removing the wooded canopy, expanding the rail footprint and adding new transit facilities (e.g. electric wires for light rail transit). These changes are particularly significant where, as here, they affect properties, like CCC, that are eligible for inclusion in the National Register of Historic Places.

SUMMARY

Substantial data deficiencies make it impossible to verify the results and conclusions reached in the AA/DEIS and associated technical reports concerning noise, vibration and visual impacts. Additional information on the methods and procedures used to characterize these resources and assess the project's impacts on them must be provided to permit the public a full and thorough review and verification of the AA/DEIS findings and conclusions. Putting the Purple Line along the Georgetown Branch right-of-way will increase noise, increase vibration and change the current park-like visual setting.

VERIFICATION

STATE OF MISSOURI
COUNTY OF JACKSON

)
)
)

ss:

I, Stephen G. Thornhill, verify that I have read the foregoing Statement, know the contents thereof, and that the same are true as stated to the best of my knowledge, information and belief.



Subscribed and Sworn to before me

this 9th day of January, 2009.


Notary Public

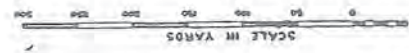
ANGIE CARTER
Notary Public-Notary Seal
STATE OF MISSOURI
Commissioned in Jackson County
Commission # 08381302
My Commission Expires Mar. 14, 2012

My Commission expires: 3-14-12

COLUMBIA COUNTRY CLUB GOLF COURSE

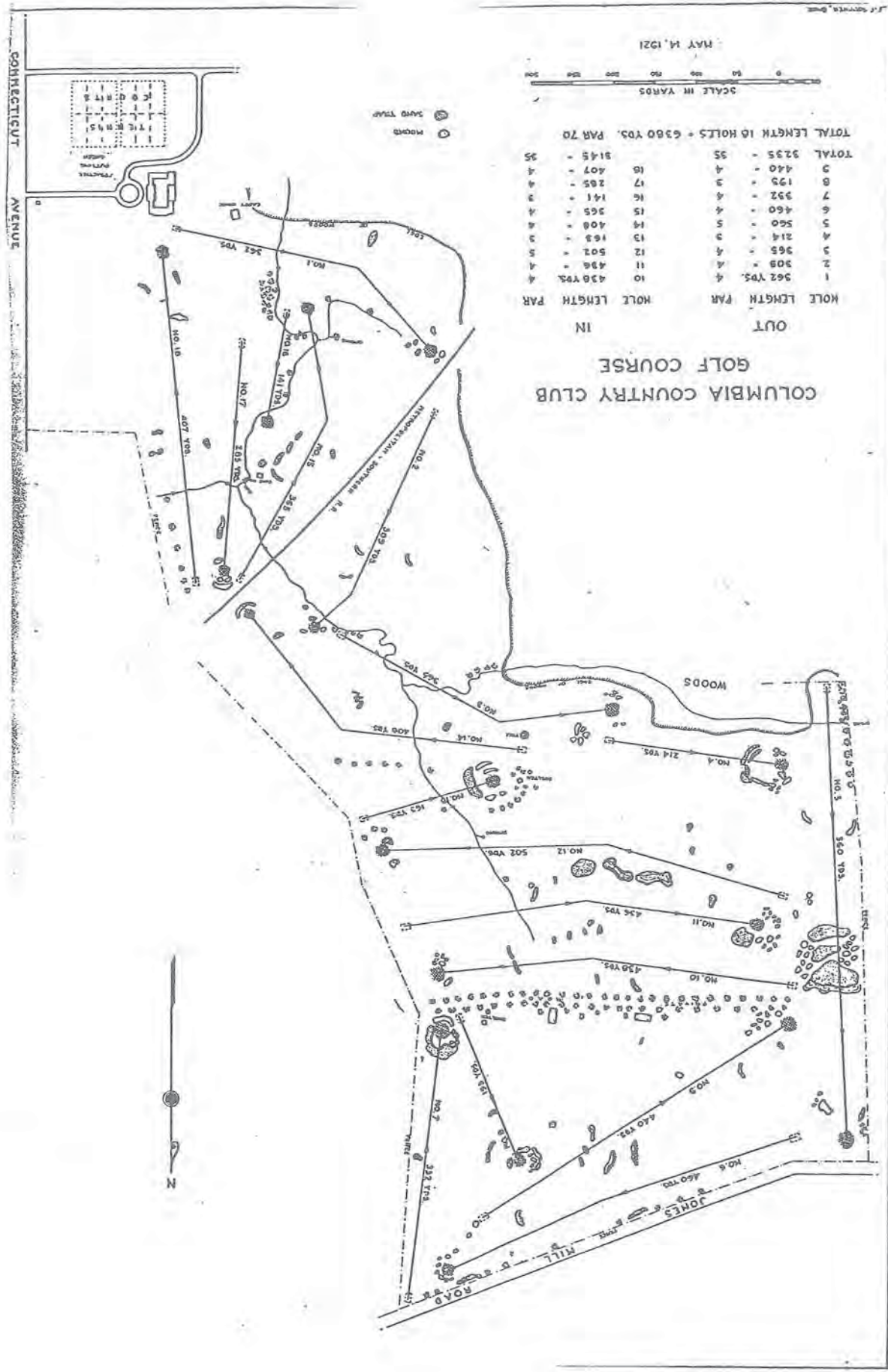
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1	362 YDS. 4	10	430 YDS. 4
2	309 - 4	11	496 - 4
3	365 - 4	12	502 - 5
4	214 - 3	13	163 - 3
5	560 - 5	14	408 - 4
6	460 - 4	15	365 - 4
7	392 - 4	16	141 - 3
8	195 - 4	17	285 - 4
9	440 - 4	18	407 - 4
TOTAL 3235 - 35		TOTAL 3145 - 35	

TOTAL LENGTH 18 HOLES - 6380 YDS. PAR 70



MAY 14, 1921

WOODS
SAND TRAP



**COLUMBIA COUNTRY CLUB'S SUPPLEMENTAL COMMENTS ON
THE PURPLE LINE ALTERNATIVES ANALYSIS/DRAFT
ENVIRONMENTAL IMPACT STATEMENT**

**Submitted by: Kevin P. Gallagher
Club Counsel
Columbia Country Club
7900 Connecticut Avenue
Chevy Chase, MD 20815**

Dated: February 18, 2009

COLUMBIA COUNTRY CLUB'S SUPPLEMENTAL COMMENTS ON
THE PURPLE LINE ALTERNATIVES ANALYSIS/DRAFT
ENVIRONMENTAL IMPACT STATEMENT

Columbia Country Club ("CCC") presents the following
Supplemental Comments on the Purple Line Alternatives Analysis/Draft
Environmental Impact Statement ("AA/DEIS") released by the Maryland Transit
Administration ("MTA") on October 17, 2008. As demonstrated below, MTA
continues to fail to adhere to its fundamental legal obligations to provide the data
and analyses underlying the cost-benefit results MTA announced in the AA/DEIS.
Playing "hide-the-ball" in a project of this magnitude is both inexcusable and
unlawful.

I.

BACKGROUND

The AA/DEIS contains MTA's estimates of projected Purple Line costs and benefits, including projections of capital costs, operating costs, fare revenues, ridership and user benefits. These estimates lie at the heart of MTA's analysis of whether construction of the Purple Line is in the public interest and MTA's analysis of whether the Purple Line will qualify for federal funding under the Federal Transit Administration's ("FTA") New Starts program. In the

AA/DEIS, MTA asks for public review and comment on these consequential calculations.

CCC's Comments, dated January 13, 2009, and filed with MTA on January 14, 2009, included verified statements from two highly respected transportation experts, Mr. Thomas D. Crowley, and Mr. William G. Allen, Jr. P.E. Both experts concluded that MTA had not released most of the key components underlying its estimates of Purple Line costs and benefits, including the electronic records that MTA relied upon in developing its calculations. Without this information, neither these experts, nor any other member of the public, can reconstruct, much less fully comment on, MTA's calculations.

MTA's disclosure failures are particularly egregious here because, as Mr. Crowley and Mr. Allen demonstrated in their verified statements, the little material that MTA has provided is riddled with critical calculation errors that either did, or could, arbitrarily lower MTA's projected project costs and arbitrarily increase MTA's projected project benefits, including project ridership. FTA has repeatedly expressed concerns about these types of forecasting errors. See CCC Comments at 15-16.

On November 17, 2008, CCC submitted a letter to MTA asking MTA to provide the missing data, assumptions and analyses underlying its AA/DEIS cost-benefit calculations. Most of the information requested was in the form of electronic records and spreadsheets. MTA asked CCC to resubmit its requests under the Maryland Public Information Act ("PIA"). CCC did so in a

letter to MTA dated November 20, 2008.¹ MTA responded to CCC's November Letters in a letter dated December 22, 2008 ("December 22 Letter"). In its December 22 Letter, MTA objected to producing the electronic records CCC requested. MTA also stated that it would produce some hard copy material if CCC paid MTA a fee. CCC paid this fee and CCC asked MTA to email the material. MTA said it could not do so and sent the material by U.S. mail. MTA's cover letter appending the material is dated January 5, 2009 and CCC received the material ("MTA Documents") on January 9, 2009.²

CCC explained in its Comments that it did not have sufficient time to review the MTA Documents before submitting its Comments on January 14, 2009. CCC reserved the right to supplement its Comments after reviewing these Documents. CCC has now reviewed the MTA Documents and addresses MTA's production in these Supplemental Comments, which include Supplemental Verified Statements ("S.V.S.") from Mr. Crowley and Mr. Allen.

To the extent such a request is necessary, CCC requests that these Supplemental Comments be included in the AA/DEIS record for good cause shown. Also, CCC is willing to meet with MTA to discuss the issues raised in its Comments and its Supplemental Comments.

¹ CCC will refer to the November 17 and November 20 letters collectively as the "November Letters."

² An electronic copy of the MTA Documents is contained in the compact disk appended to these Supplemental Comments as Counsel's Supplemental Exhibit.

II.

MTA's DOCUMENT PRODUCTION IS COMPLETELY INADEQATE

As discussed in detail in Mr. Crowley's and Mr. Allen's appended supplemental verified statements, the MTA Documents are woefully deficient, and, as a practical matter, how MTA prepared its cost-benefit estimates remains hidden in a "Black Box" that MTA refuses to open up for public inspection. See Crowley S.V.S. at 2; Allen S.V.S. at 1-2. Also, as Mr. Allen and Mr. Crowley point out, the additional snippets of information that MTA did produce provide still more evidence that MTA's analysis contains fatal flaws. See, e.g., Allen at 2 ("MTA or its consultant[] has misinterpreted the user benefit calculation, as defined by the [FTA]").

The many reasons why MTA's responses to CCC requests are deficient are explained in detail in Mr. Crowley's and Mr. Allen's verified statements and in their supplemental verified statements. Of particular concern is MTA's steadfast refusal to produce any requested electronic records. MTA developed its AA/DEIS calculations using electronic spreadsheets and other electronic procedures. Most of CCC's 19 document requests ask for copies of these electronic records.³

MTA produced no electronic records in response to CCC's requests. In some instances, MTA asserted that it was not legally obligated to produce the requested electronic records because they are "proprietary" to its contractors and,

³ See CCC November Letters, CCC Requests Nos. 4-19.

according to MTA, exempt from production under the PIA.⁴ In these and other instances, MTA produced some hard copy documents it implies are satisfactory substitutes for the electronic material requested.⁵ MTA's assertions and implications are wrong.

A. MTA Cannot Lawfully Withhold Electronic Records In This AA/DEIS Proceeding On Grounds That The Involved Records Are "Proprietary"

This is an AA/DEIS proceeding where MTA has asked for public comments on its Purple Line cost-benefit calculations. The law is clear here. When an agency asks for public comments in an AA/DEIS proceeding, it must make available all pertinent underlying study data, formulas and procedures. Otherwise, the public cannot file meaningful comments. See CCC Comments at 14-16.

MTA cannot evade these clear legal requirements by claiming that underlying AA/DEIS study data and procedures are "proprietary" to its contractors. The public disclosure requirements in the AA/DEIS context confer no exception for the non-disclosure of "proprietary" records. All pertinent material needed to present meaningful comments must be disclosed by the agency that issued the AA/DEIS.

⁴ See MTA Dec. 22 Letter, MTA responses to CCC Request Nos. 4, 7, 8, 10, 16.

⁵ See, id., MTA responses to CCC Requests Nos. 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17 and 18.

The need for disclosure of AA/DEIS cost-benefit study data, assumptions and methodologies is particularly important here. MTA is proposing that public funds be expended on this project. These expenditures could be well in excess of \$1.6 billion. Having placed the cost-benefit study results in the public domain, MTA cannot now claim the underlying study data needed to understand how MTA arrived at its study results, and to critique those results, is somehow “proprietary.” MTA crossed that bridge when it released the cost-benefit study for public comment. The public has a clear and unmistakable right to access the underlying cost-benefit study material.

Nor can MTA end-run its legal obligations in the AA/DEIS process by citing the PIA. If MTA is correct that it does not have to disclose the requested electronic records under the PIA – and as demonstrated below MTA is clearly incorrect – MTA will have to change its arrangements with its contractors to permit public disclosure of these records to fulfill its obligations to the public in this proceeding or, if that cannot be accomplished, end the proceeding.

What MTA cannot do is have it both ways. MTA cannot ask for public comment on its cost-benefit study and then deny the public access to the records necessary to understand and comment on the study results. Public comment in the AA/DEIS process does not assist MTA, nor other decision makers, if it is not fully informed.

**B. The PIA Does Not Permit MTA To Withhold
The Requested Electronic Records**

The PIA provides that “[a]ll persons are entitled to have access to information about the affairs of government” and is “construed in favor of permitting inspection of a public record.” Md. Code Ann., State Gov’t Art. §§ 10-612(a), (b). The PIA provides citizens “wide-ranging access” to public records. See Office of the Governor v. Washington Post Co., 360 Md. 520, 545 (2000) (internal quotation omitted) (citing cases).

Electronic records received by MTA “in connection with the transaction of public business” are public records subject to disclosure under the PIA (see id. § 10-611(g)(1)(ii)(2)) and, where electronic records are requested, the Maryland Attorney General has instructed MTA to “voluntarily accede to the requester’s choice of [electronic] format unless doing so imposes a significant . . . burden on the agency.” Md. Atty. Gen., Maryland Public Information Act Manual 12 (11th ed. Oct. 2008) (“PIA Manual”).

In its December 22, 2008 Letter, MTA claims some of the electronic records CCC requested are exempt from disclosure under the PIA provisions codified at Md. Code Ann., State Gov’t Art. § 10-617(d). This provision permits MTA to deny public access to specified forms of information submitted to it including “trade secret[s],” “confidential commercial information,” “confidential financial information,” and “confidential geological or geophysical information.”

Id. MTA does not cite any of these grounds specifically, claiming only that the information withheld under this provision is “proprietary.”

CCC finds it difficult to understand how MTA can seriously believe that it can withhold the requested records under Section 10-617(d) because the requested records are assertedly the “proprietary” work product of its contractors. MTA’s contractors were retained to assist MTA in making MTA’s calculations of project costs and benefits. The calculations MTA released in the AA/DEIS for public comment are MTA’s calculations, not those of its contractor. Documents generated by MTA are clearly not covered by Section 10-617(d). See PIA Manual at 30 (“[i]nformation generated by the agency itself is not covered by SG § 10-617(d)”). Contractors are retained to assist MTA in making MTA’s calculations, not to take the place of MTA by making their own calculations.

Furthermore, even if one assumes for PIA purposes that the requested electronic records were not generated by MTA, MTA cannot withhold them under Section 10-617(d). The involved electronic records are records that appear to consist of electronic spreadsheets and other electronic workpapers used to input publicly available study data and produce publicly released study outputs. The electronic recording and processing of public data to produce publicly released results clearly does not involve the use of any “trade secrets,”

“confidential commercial information” or “confidential financial information” as those terms are used in Section 10-617(d).⁶

Finally, it appears that MTA has paid its Purple Line contractors using public funds. The public has a clear right here to obtain copies of the material MTA has paid for with public monies. CCC emphasizes that its sole interest in obtaining the requested records is to replicate, and critique, the cost-benefit results set forth in the AA/DEIS. CCC has no interest in using these records for any other purpose and is willing, if necessary, to execute a stipulation to this effect covering CCC and its retained experts.⁷

**C. MTA’s Hard Copy Responses Are Not Adequate
Substitutes For The Requested Electronic Documents.**

Mr. Crowley and Mr. Allen demonstrate, on a request-by-request basis, why MTA’s hard copy production is not a sufficient alternative way for CCC to obtain the electronic information CCC requested in its November letters.

⁶ See PIA Manual at 29 (“[a] trade secret [under Section 10-617(d)] is something known to only one or a few, kept from the general public, and not susceptible of general knowledge. If the principles incorporated in a device are known to the industry, there is no trade secret.”)(citation omitted); id. at 31 (information is deemed confidential under Section 10-617(d) if it will “impair the government’s ability to obtain the information in the future” or “cause substantial harm to the competitive position of the person from whom the information was obtained”) (quoting National Parks & Conservation Ass’n v. Morton, 498 F.2d 765, 770 (D.C. Cir. 1974)). Maryland courts construe PIA exemptions “narrowly” and the burden is on the withholding agency to “justify . . . nondisclosure.” Office of the Governor, 360 Md. at 545 (internal quotations omitted). MTA’s December 22 Letter does not even discuss these standards, much less “justify” nondisclosure under them.

⁷ CCC reserves all of its rights under the PIA, including its appellate rights.

See Crowley S.V.S. at 3-17; Allen S.V.S. at 2-7. For example, CCC's Request No. 4 asked MTA to produce the electronic workpapers, in spreadsheet format, that detail the development of the annual incremental operating and maintenance ("O&M") expenses summarized in Tables 4-7 and 4-8 of MTA's O&M Technical Report.

In response, MTA provided a paper copy of the O&M Technical Report and stated that all information necessary to replicate MTA's O&M costs was set forth in this report. However, as Mr. Crowley explains:

MTA's failure to provide its underlying electronic workpapers for its O&M cost calculations while stating that all necessary information to reproduce the costs is available in the O&M Technical Report is analogous to providing a mechanic with a crate of unmarked automobile parts without any blueprints and packing lists and stating that the mechanic could construct a complete car from the parts contained in the crate. Even an expert auto mechanic or automotive engineer could not fully and accurately reproduce the desired vehicle without basic construction information. The same holds true here. Even if MTA has provided all of the necessary information in its O&M Technical Report, which it has not, without any "blueprints" provided by the electronic workpapers, replicating MTA's results can only take place through extensive trial and error, with no guarantee that the costs could be accurately produced.

Crowley S.V.S. at 8.

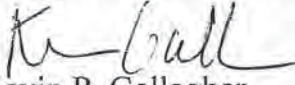
The bottom line is clear here. MTA does not want to give CCC, or any other member of the public, access to the materials necessary to replicate, and fully critique, the cost-benefit analysis set forth in the AA/DEIS.

MTA's "hide-the-ball" strategy violates the law and is of particular concern because of MTA's public statements in 2007 that it was delaying its study of the Purple Line for a year to address asserted flaws in its cost-benefit modeling that "underestimated the amount of ridership" on the Purple Line.⁸ MTA appears to have goosed-up its ridership figures in the AA/DEIS but now refuses to let the public see how it generated these increased figures, as well as how it electronically developed and manipulated the other key components in its cost-benefit analysis.

CONCLUSION

CCC appreciates the opportunity to present these Supplemental Comments on the AA/DEIS.

Respectfully submitted,

By: 
Kevin P. Gallagher
Club Counsel
Columbia Country Club
7900 Connecticut Avenue
Chevy Chase, MD 20815

Dated: February 18, 2009

⁸ See "Suspect ridership projections to delay the Purple Line" (originally published March 7, 2007 and reproduced at www.gazette.net/stories/030707/silvnew201347_32327.shtml).

February 2009

Columbia County Club

On Behalf of

L.E. Peabody & Associates, Inc.

Verified Statement
of
Thomas D. Crowley
President

*IN THE MATTER OF THE ALTERNATIVES ANALYSIS/
DRAFT ENVIRONMENTAL IMPACT STATEMENT
RELATED TO THE PURPLE LINE*

MARYLAND DEPARTMENT OF TRANSPORTATION

MARYLAND TRANSIT ADMINISTRATION

AND

US DEPARTMENT OF TRANSPORTATION

FEDERAL TRANSIT ADMINISTRATION

BEFORE THE

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I. INTRODUCTION

My name is Thomas D. Crowley. I am the same Thomas D. Crowley who submitted a Verified Statement on behalf of the Columbia Country Club ("CCC") on January 13, 2009 ("January VS"). A copy of my credentials was included as Exhibit No. 1 to my January VS.

In my January VS, I was asked by CCC to review the Maryland Transit Administration's ("MTA") estimates of the Purple Line's operating costs, maintenance costs and capital costs as set forth in Purple Line Alternatives Analysis/Draft Environmental Impact Statement ("AA/DEIS"). I concluded in my January VS that MTA had not provided sufficient data for me, or any other member of the public, to test the accuracy of MTA's costs calculations.

On November 17, 2008 CCC submitted a request ("November Request") seeking corrections, supporting documents and electronic files underlying MTA's capital and operating cost calculations and user benefit calculations for the AA/DEIS.¹ On December 22, 2008, MTA responded ("December Response") to CCC's November Request, and the subsequently produced paper documents addressing some of the issues included in CCC's November Request.²

CCC has requested that I evaluate and comment on the documents provided by MTA in response to the November Request. Based upon my evaluation, I have reached the following principal findings and conclusions. First, MTA failed to provide all of the information requested in CCC's November Request, including information that would

¹ On November 20, 2008, CCC filed a request, under the Public Information Act, seeking the same materials.

² MTA did not produce its documents concurrent with its December Response. Rather, MTA provided the documents to CCC under cover letter dated January 5, 2009.

make corrections to obvious errors in MTA's AA/DEIS. Second, MTA failed to provide all of the information it stated it would produce in its December Response, including complete copies of the worksheets used to develop the operating and capital cost components of the AA/DEIS. Third, the paper documents MTA did provide in response to the November Request are insufficient replacements for electronic copies of the worksheets because the paper documents are insufficiently detailed and documented to fully audit and reconcile the costs, do not allow for inspection and verification of the underlying calculations, cannot be electronically linked to verify that the AA/DEIS costs properly flow through the various summary levels, and reproducing the documents in electronic forms would be extremely time consuming and burdensome, and could lead to additional data errors.

Based on the data contained in the AA/DEIS, its supplemental reports and the information provided by MTA in response to the November Request, I, or any member of the public, still do not possess the necessary information to reconcile each proposed transit alternative's cost estimates or to test the accuracy of key O&M and capital cost assumptions.

The remainder of my testimony is summarized below under the following topical headings:

- II. O&M Cost Data
- III. Capital Cost Data
- IV. User Benefits Data

II. O&M COST DATA

CCC's November Request included six (6) specific requests related to the production of supporting documents and corrections to information contained in the AA/DEIS, necessary to evaluate and verify MTA's calculations of expected Operating and Maintenance ("O&M") costs. MTA's six responses to CCC's requests were either completely unresponsive to the request or only partially responsive. As I indicate in detail below, MTA failed to provide the data requested, provided the data with insufficient detail to evaluate the information, and has failed to provide electronic versions of the workpapers that would indicate how MTA's costs were produced.

A. TABLE 4-7 AND TABLE 4-8 DATA

CCC's Request No. 1 sought the estimated number of revenue vehicle hours, scheduled revenue vehicle miles and peak number of vehicles for each alternative used to develop the annual incremental O&M expenses shown in Tables 4-7 and 4-8 of the "Operating and Maintenance Cost Estimate Technical Report" ("O&M Technical Report"). In response to CCC's request, MTA reproduced a paper copy of the O&M Technical Report's Table 4-6, which is titled "Annual Operating Statistics by Alternative and Mode."

MTA's response is insufficient because the data shown in Table 4-6 are not annual figures and are insufficient to calculate the annual incremental O&M expenses without further explanation or additional data. The primary issue with the data contained in Table 4-6 is that it does not appear to reflect true annual figures. The title of Table 4-6 is "Annual Operating Statistics by Alternative and Mode," yet the figures included in the

table are clearly not annual statistics based on their values. For example, included in the Alternative No. 3 statistics for the Low Investment BRT alternative, Table 4-6 indicates the number of Peak Vehicle Hours incurred is expected to equal 37 hours, while Revenue Vehicle Miles are expected to equal 319 miles.³ Assuming one vehicle operated one hour a day on every day of the year would place the number of hours at 365 hours per year. Similar relatively small figures for Revenue Vehicle Hours and Revenue Vehicle Hours are shown for each of the other alternatives. These are clearly not annual statistics as labeled by MTA.

Additionally, if the figures are not annual figures as labeled, and are in fact representative of some other time or value basis, MTA has supplied no conversion factors or formulas for their conversion to annual statistics.⁴ Without additional information as to the basis of the numbers contained in Table 4-6, and what they represent, it is not possible to reconcile and evaluate MTA's O&M expense calculations.

B. ONE-WAY TRACK MILES

CCC's Request No. 2 sought information regarding the one-way track miles for each Bus Rapid Transit ("BRT") and Light Rail Transit ("LRT") used to develop the annual incremental O&M expenses shown in Tables 4-7 and 4-8 of the O&M Technical Report. In response to CCC's request, MTA indicated the requested information was contained in the O&M Technical Report's Table 4-6.

Table 4-6 of the O&M Report does show "One-Way Guideway Miles," but these miles are inconsistent with the route miles shown elsewhere in the AA/DEIS. For

³ See O&M Report at Page 4-5.

⁴ For example, the figures could be in hundreds or thousands of hours per year.

example, Table 5-1 of the AA/DEIS shows the length of the proposed LRT and BRT systems ranging from 16.2 to 16.9 miles, depending upon the build alternative studied. These figures are significantly different than the mileage figures shown in Table 4-6, which range from 0 to 15.5.⁵ Without MTA's electronic files that show the actual calculations of the O&M costs, it is not possible to determine which track miles were used and reflected in the O&M summary costs.

**C. CORRECTED
TABLE 4-1**

CCC's Request No. 3 asked for a corrected version of the O&M Technical Report's Table 4-1. In response to CCC's request, MTA stated that the data contained in Table 4-1 was the most current data. Based on the O&M Technical Report's explanation of the data contained in Table 4-1, MTA response did not provide the requested information.

The data that is supposedly contained in Table 4-1 are critical to the calculations of the O&M costs because they represent the operating statistics for each Purple Line alternative, and to which the O&M unit costs are applied. The O&M Technical Report describes the data contained in Table 4-1 as follows:

The estimate of costs for each alternative was determined by multiplying the unit costs by the number of vehicles, hours, and miles of service estimated for each alternative and the one-way track miles for BRT and LRT alternatives. The fully burdened cost comes from adding together the costs generated by these factors and the factors for BRT or LRT guideway. Table 4-1 shows

⁵ See O&M Report at Page 4-5.

these operating statistics for each alternative.⁶

MTA's explanation indicates that the data in Table 4-1 should show the "number of vehicles, hours, and miles of service estimated for each alternative..." yet Table 4-1 is labeled "TSM Bus Headways (minutes)," and contains what appears to be origin-destination headway times. Additionally, Table 4-1 contains no information on the number of vehicles, hours or miles of service, nor does it discuss each transit alternative included in the AA/DEIS. Table 4-1 may be a partial input to the cost model, but there is no clear explanation of its use, or link to the other operating statistics cited in the report.

CCC's Request No. 3 sought to obtain a version of Table 4-1 that was consistent with the description of the referenced table in the O&M Technical Report, and allow for the calculation of O&M costs. Without additional information, it is not possible to discern how the data contained in Table 4-1 is used to develop O&M expenses for each alternative.

D. CALCULATION OF INCREMENTAL O&M EXPENSES

In its Request No. 4, CCC asked for the electronic worksheets, in spreadsheet formats, that detail the development of the annual incremental O&M expenses included in Tables 4-7 and 4-8 of the O&M Technical Report. In its Request No. 5, which served as a follow-up for Request No. 4, CCC sought an explanation for the link, if any, between the statistics shown in Table 4-6 of the O&M Technical Report to the statistics used to develop the annual incremental O&M Expenses in the same report.

⁶ See O&M Technical Report at Page 4-1.

MTA's responses to CCC's requests were to provide a paper copy of the O&M Technical Report, and to state that all the information necessary to replicate the O&M costs is available in the O&M Technical Report. MTA's failure to provide the electronic spreadsheet files and to provide the data necessary to link disparate data included in the O&M Technical Report, when combined with its failure to provide the other requested O&M data, makes it impossible to restate the O&M costs.

Electronic spreadsheet files perform several functions when developing cost analysis. First and foremost, the use of electronic spreadsheets allows for the efficient and logical construction of cost flows, which allow users to follow the stream of expense figures from initial calculations through summarization. MTA clearly understates the uses and benefits of electronic spreadsheets in cost analyses as it indicated that electronic spreadsheets were extensively used in the development of the AA/DEIS capital costs. As stated by MTA in its Capital Cost Estimating Methodology Technical Report ("Capital Cost Report"):

Procedures were developed that streamline the estimating process and allow a thorough review and checking of the cost data in order to avoid clerical and mathematical errors. The proposed procedures include:

- Use of proven computer software for data processing and storage; and
- Development of data in a cost-stream format and subsequently summarizing to higher levels.

All capital cost estimates for the Purple Line Corridor were prepared using Microsoft Excel. The organization of the cost data into cost stream formats allows a thorough review and checking of the data...

Second, the uses of electronic spreadsheets, if constructed properly, provide a detailed map of the cost calculations, and provide links between different cost elements. By observing where a spreadsheet sources the data used for calculations and how the calculations are made, it is possible to map the contained cost constructions. Without a map to the links and ability to observe the calculations, authentication of costs can only be developed through educated guess and trial and error.

MTA's failure to provide its underlying electronic workpapers for its O&M cost calculations while stating that all necessary information to reproduce the costs is available in the O&M Technical Report is analogous to providing a mechanic with a crate of unmarked automobile parts without any blueprints and packing lists and stating that the mechanic could construct a complete car from the parts contained in the crate. Even an expert auto mechanic or automotive engineer could not fully and accurately reproduce the desired vehicle without basic construction information. The same holds true here. Even if MTA had provided all of the necessary information in its O&M Technical Report, which it has not, without the "blueprints" provided by the electronic workpapers, replicating MTA's results can only take place through extensive trial and error, with no guarantee that the costs could be accurately produced.

E. INCREMENTAL FAREBOX REVENUES

CCC's Request No. 6 asked for the electronic workpapers, in spreadsheet formats, that detail the annual change in Systemwide Farebox Revenues included in Table 5-2 of the AA/DEIS.⁷ In response to the request, MTA provided paper copies of the underlying

⁷ Table 5-2 netted annual changes in systemwide farebox revenues against incremental O&M costs to

workpapers, without any explanation of their construction or derivation. MTA's response is insufficient because not only did it not provide the workpapers in the requested electronic format, but also data was missing from the information MTA did provide.

As I explained above, electronic spreadsheets allow for the tracing and auditing of cost, and in this case, revenue analyses. Without all of the underlying electronic files, it is extremely difficult, if not impossible, to recreate the revenue analyses developed by MTA. In addition to the lack of electronic files, MTA's production also is insufficient for a number of other reasons which are outlined below:

1. MTA failed to provide any decoders, descriptions or explanations for the item listings and acronyms included in the provided documents.
2. MTA did not provide supporting documents for the "TSM," "Medium Investment BRT," "Low Investment LRT," or "High Investment LRT" alternatives.
3. MTA provided no explanation or directions as to how "Annual" revenues were developed from "Total Revenue" for each alternative included in the Revenue Summary Sheet.⁸

4. The supporting worksheets provided by MTA show the "Total Revenue" for the alternatives based on the sum of revenues, based on access to the Purple Line (Walk, Kiss-and-Ride, Park-and-Ride), time of use (Peak or Off-Peak) and type of trip (Home-Based Work, Home-Based Other, or Non-Home Based). However, MTA has not provided any detail explaining the development of the revenue for each access mode, time period and type of trip.

5. The change in the Farebox Revenue shown in the Revenue Summary printout matches the data contained in Table 5-2 of the AA/DEIS, but does not match the data in Table 3-14 of the AA/DEIS or the data in Table 2-12 of the Travel Demand Forecasting Technical Report, which also claim to show changes in System Farebox Revenue.

⁸ The "Annual" revenue for each alternative is approximately 153.5 times larger than the "Total Revenue" calculate annual O&M subsidies for each alternative. The summary provides no explanatory footnotes or guides as how this constant was derived or what it represents.

The problems identified above may have been averted if MTA had provided the missing data and the information in an electronic spreadsheet format as requested. However, MTA's failure to provide this basic information forecloses a meaningful evaluation of the change in farebox revenues.

In addition to the information requests seeking data on MTA's O&M cost calculations, CCC's November Request also included five (5) specific requests related to the production of supporting documents for MTA's capital cost calculations. As with MTA's production of O&M cost data, MTA's production of capital cost data suffered from a failure to provide electronic copies of its underlying workpapers, and from missing data. The result is an inability to reconcile and restate MTA's capital costs.

A. MTA'S UNIT COST LIBRARY

CCC's Request No. 7 asked for an electronic spreadsheet copy of the Unit Cost Library ("UCL") included in Appendix A to the Capital Cost Report. In response, MTA stated an electronic copy of the Unit Cost Library is included in Appendix A of the Capital Cost Report, which shows all input unit cost and quantities that were used to develop each alternative cost estimate for the Purple Line AA/DEIS report. The electronic versions in which MTA alludes to in its response to CCC's request are a Portable Document Format, or "PDF," version of the UCL. Unlike electronic spreadsheets, which allow a user to investigate and change the underlying data, electronic PDF files are nothing more than electronic images of hard copy documents. As such, providing a PDF of the UCL is of no more value to a user than providing a paper version of the library since spreadsheet files used to develop the MTA's capital cost estimates cannot be electronically linked to the UCL file. The inability to link to the UCL

III. CAPITAL COST DATA

undermines the rational for using electronic spreadsheets, and makes any corrections to the UCL extremely burdensome and complicated.⁹

B. CAPITAL COST CALCULATIONS

CCC's Requests Numbers 8 and 10 asked for copies of the electronic spreadsheets used to develop the capital costs for each alternative as described in Sections 4.2.3 and 4.2.4 and Table 6-1 of the Capital Cost Report. In response to CCC's requests, MTA provided approximately 249 pages of printed documents purporting to show the calculations of each alternative's capital costs.

A review of the documents provided by MTA shows the calculation of some, but not all, of the capital costs for each AA/DEIS alternative. MTA's capital cost methodology uses three levels of cost presentation to provide cost information in increasing levels of detail. At the "Segment Level," costs are developed for each segment along each alternative's alignment by multiplying the expected number of units for each cost category item used on the segment by the unit costs from UCL and by an allocated contingency factor. At the "Summary Level," data from the Segment Level worksheets are summarized by cost category and alignment segment, and professional service and unallocated contingency additives are applied. Finally the "Summary" aggregates costs from the "Summary Level" by FTA SCC code in a one-page document. Even with the information included in the supplied paper documents, the data necessary to completely evaluate the capital costs is lacking. First, MTA did not provide complete copies of its underlying worksheets. Specifically, MTA did not provide Page

⁹ For example, the PDF version of the UCL included on the MTA's website is comprised of approximately 300 pages of cost calculations.

13 to its Item 8 response, which contains a portion of the Summary Level Cost Estimate for Cost Categories 40 through 70 for the "Bus Rapid Transit - Alternative 3 Low Investment" alternative. MTA also did not provide "Segment Level Cost Estimates" worksheets for the "Light Rail Transit - Alternative 8 High Investment" alternative. Based upon the page numbers for the information supplied, this data should begin with page number 250.¹⁰

Second, MTA did not provide the documents or electronic files to link construction quantities to its capital cost calculations. MTA developed its capital cost calculations by multiplying construction units developed from engineering estimates by unit costs contained in the UCL. While providing the development of unit costs in the UCL, MTA did not provide any information or supporting workpapers for the quantities of each capital cost item used in its calculations. Without the ability to link the quantities back to the engineering specifications, drawings and plans, it is not possible to fully verify the capital cost computations.

Third, there are over 250 individual detailed worksheets included in MTA's response to CCC's Request Numbers 8 and 20. Based on notes contained in the documents provided, the worksheets were produced using the Microsoft Excel spreadsheet program.¹¹ To fully evaluate MTA's capital cost calculations without the Microsoft Excel worksheets, each worksheet would have to be manually entered into a spreadsheet and verified. As indicated above, MTA states that it developed its capital cost estimates in spreadsheet formats specifically to facilitate the organization of its data

¹⁰ MTA's document production for this request ended at page 249, so it is unknown how many pages of documents are actually missing.

¹¹ See for example page 6 of MTA's Item 8 response, which indicates the document was produced in a file named "Alt 2 TSM Est 04-18-08.xls." The ".xls" file extension included in the file names indicates the file was saved as a Microsoft Excel spreadsheet file.

to allow for a thorough review of its data. MTA's failure to produce its documents in the relevant format negates the benefits of using electronic spreadsheets.

**C. STANDARD COST
CATEGORY
WORKSHEETS**

CCC's Request No. 9 asked for electronic copies of the Federal Transit Authority ("FTA") Standard Cost Category ("SCC") Excel worksheets used to develop the cash flow projects for each alternative as described in Section 4.2.5 of the Capital Cost Report. MTA responded that it did not use the FTA's SCC worksheets, but that it would provide a blank copy of the SCC worksheet format.

Page 4-4 of MTA's Capital Cost Report discusses the contents and use of the FTA's SCC Excel workbooks, which are required for projects seeking funding as part of the FTA's New Starts program. If MTA did not develop these workbooks as required, the question must be asked as to why not, and how did they believe they are complying with FTA New Start Procedures.

In addition, MTA's response that it would provide a copy of the FTA's SCC worksheets is nothing but window dressing since complete electronic copies are available for download to the public from the FTA's website. MTA's provision of a blank SCC worksheet would not provide probative value for assessing MTA's capital cost estimates.

**D. ANNUALIZED
CAPITAL COSTS**

CCC's Request No. 11 asked for MTA to provide the electronic worksheets used

to calculate the Annualized Capital Costs shown in Table 6-3 of the AA/DEIS.¹² In response to CCC's request, MTA provided a one-page document that contains the annualized capital costs for each alternative based on what MTA calls the "Estimated EAC Percent For Capital Cost."

MTA's responsive documentation is flawed for two primary reasons. First, the "Estimated EAC Percent" approach used by MTA to convert its capital cost estimates into equivalent annualized costs is contradictory to the approach MTA stated it took to calculate the annualized capital cost in its Capital Cost Report.¹³ At page 4-5 of the Capital Cost Report, MTA stated that for "each capital cost item, the annualized equivalent is computed..." for each cost category. As is shown in the table of Annualization Factors beginning on Page 4-5 of the Capital Cost Report, each capital cost item has its own annualization factor based on assets estimated useful life. MTA's use of an "Estimated BCA Percent" could likely lead to a different answer than if the individual Annualization Factors were used.

Second, MTA did not provide the details of its development of the "Estimated EAC Percent" factor used in its calculations, nor the spreadsheet showing the development of its estimate. Without the supporting documentation and an electronic copy of the spreadsheet that developed the EAC percent, it is not possible to verify its calculation or test the calculation's underlying assumptions. For example, does the EAC percent represent a weighted-average of the individual annualized cost percentages of

¹² As explained on page 4-5 of the Capital Cost Report, the evaluation of cost effectiveness of each alternative requires that all benefits and costs be expressed in annual terms. Because capital costs are expressed in total expenditures in constant dollar terms, an annual payment is calculated that is equivalent to what is in reality a one-time expenditure of capital funds.

¹³ MTA does not define "ECA" in the documents produced, but I assume it stands for "Equivalent Annualized Cost."

each capital item, or is it an unsupported guess as to what an average EAC percent would be?

IV. USER BENEFITS DATA

CCC's November Request included two (2) requests for information supporting the development of the Annualized Cost Per Hour of Unit Benefits shown in Table 6-2 and 6-3 of the AA/DEIS, and supporting the development of Annualized Cost Per New Rider Relative To The No Build Alternative shown in Table 6-3. In lieu of providing the electronic spreadsheets as requested, MTA provided a one page document summarizing the Annual User Benefit calculation and another one page document summarizing the Cost per New Rider Relative to the No Build alternative.

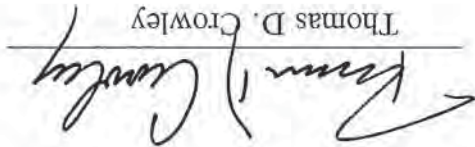
Both of the documents produced by MTA suffer from the same basic fatal flaws. First, by not providing the summaries and their supporting documents in electronic spreadsheet formats, I, or any other member of the public, cannot determine if the calculations are truly reflective of the underlying assumptions and costs of each alternative. Second, both summaries use the same unsupported EAC Percent of Capital Costs discussed above. Third, both summaries use Net Changes in O&M costs that differ from the Net Changes in O&M costs developed in the O&M Technical Report.¹⁴ This leads to an understatement in O&M unit costs and an overstatement of user benefits. Once again, MTA's failure to provide electronic copies of its workpapers, as well as the workpapers' underlying documentation, disallows a comprehensive inspection and evaluation of each alternatives user benefits.

¹⁴ Each summary uses a net change in O&M cost of \$22.2 million for the LRT High Investment alternative, but the O&M Technical Report shows a change of \$22.8 million.

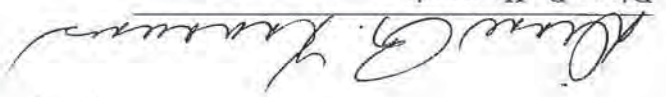
VERIFICATION

COMMONWEALTH OF VIRGINIA)
)
) CITY OF ALEXANDRIA)

I, THOMAS D. CROWLEY, verify under penalty of perjury that I have read the foregoing Supplemental Verified Statement of Thomas D. Crowley, that I know the contents thereof, and that the same are true and correct. Further, I certify that I am qualified and authorized to file this statement.


Thomas D. Crowley

Sworn to and subscribed
before me this 17th day of February, 2009


Diane R. Kavounis
Notary Public for the State of Virginia

My Commission Expires: November 30, 2012
Registration Number: 7160645

SUPPLEMENTAL VERIFIED STATEMENT OF WILLIAM G. ALLEN, JR., P.E.

My name is William G. Allen, Jr., P.E. and my business address is P.O. Box 390, Windsor, SC 29856. I am a sole proprietor transportation planning consultant, specializing in travel demand forecasting. I am the same individual who presented a verified statement as part of the Columbia County Club's (CCC) 13 January 2009 submission. I have been asked to supplement my prior verified statement to address the material that the Maryland Transit Administration (MTA) submitted to CCC in response to CCC's data request.

I have reviewed CCC's letters to MTA (Kevin Gallagher to Michael Madden, 17 November 2008 and Kevin Gallagher to John D. Porcari, 20 November 2008), requesting additional information concerning the calculations of capital cost, operating cost, user benefits, and ridership presented in the Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) for the Purple Line Project. I also reviewed MTA's response to these letters (Michael Madden to Kevin Gallagher, 22 December 2008) and the material that MTA submitted to CCC (Stacey Freedman to Kevin Gallagher, 5 January 2009). My comments are limited to those items in CCC's original requests numbered #12 through #19. These address the calculations of transit ridership and transit user benefits.

The following is a summary of my key observations concerning MTA's response:

- (1) MTA did not provide any of the requested data files in electronic ("computer readable") format. The MTA response was limited to paper copies of certain materials, some of which were unnecessary duplicates of exhibits from the AA/DEIS document. The project's electronic files contain critical information that must currently exist (or must have existed at some point) in order for MTA to complete its analyses and which provide details that go far beyond what is available in paper form.
- (2) The materials that MTA provided are only partially responsive to CCC's request. It is readily apparent in some cases that MTA staff did not understand CCC's request and apparently was unwilling to enlist the assistance of its consultants in preparing a complete and accurate response to the questions. Travel forecasting is an intricate, complex process and it is common for transit agencies to rely on consultant expertise in preparing a major document such as a DEIS. Thus it is appropriate for the agency to rely on consultant expertise in responding to detailed questions about the travel forecasting procedure and results. That does not appear to have occurred in this case.
- (3) MTA's responses do not provide the information necessary to allow CCC to review and evaluate key assumptions concerning the definitions of the alternative transit scenarios.

The following analysis supports these conclusions, and supplements the analysis set forth in my prior verified statement. My supplemental statement comments address each of CCC's requested data items from #12 to #19, inclusive (using CCC's original data item numbering).

#12. Please provide the electronic worksheets used to develop the Annualized Cost Per Hour of Unit Benefits shown in Tables 6-2 and 6-3 of the DEIS.

MTA's response was a paper copy of a table containing essentially the same information that can be found in the DEIS. The only new piece of information is that it confirms that MTA used an annualization factor of 294 (a factor used to convert average weekday statistics to annual statistics). Otherwise, this simply confirms my earlier assessment that someone (MTA or its consultant) has misinterpreted the user benefit calculation, as defined by the Federal Transit Administration (FTA). FTA requires that transit user benefits be calculated as the difference in equivalent travel time between a

Build alternative and a Baseline alternative. FTA requires that the Baseline alternative represent low-cost improvements, which is almost always defined as the "Transportation System Management" (TSM) alternative (see U.S. Government Accountability Office report GAO-08-844, July 2008, page 59). Because the calculation of user benefits is supposed to compare a Build alternative to the TSM alternative, it is not possible to compute user benefits for the TSM case itself. Yet the DEIS and MTA's response to this request both show such a figure (1,965,880 hours/year). This implies that the entire column labelled "Annual User Benefit Hrs" is incorrect, although I am unable to verify that without looking at the inputs to the Summit computer program for each alternative. (Summit is the FTA computer program that calculates transit user benefits.) Thus, the column labelled "Annual User Benefit Above TSM" is irrelevant and the cost effectiveness figures shown here are incorrect.

It appears that MTA or its consultant calculated user benefits based on the difference between each Build alternative and the No Build alternative. Then, they calculated the incremental user benefit for the TSM and each Build alternative and compared that to the incremental cost. This is inconsistent with FTA's New Starts requirements and produces statistics that can't be compared to FTA's cost effectiveness limits (as the AA/DEIS does). Calculating the "incremental user benefit" in this manner makes no sense, since the user benefit is itself an incremental calculation.

#13. Please provide the electronic worksheets used to develop the Annualized Cost Per New Rider Relative to the No Build Alternative shown in Table 6-2 of the DEIS.

MTA's response is a paper copy of a table that shows some of the intermediate calculations leading to its estimated cost per new rider for each alternative, relative to the No Build scenario. This provides a little more data than is in the AA/DEIS, but does not describe or document the assumptions that went into these calculations and thus does not fully respond to the data request.

#14. Please provide the AECOM Transit original mode choice calibration report, including all mode choice coefficient values.

MTA provided the mode choice model "user's guide", which explains how to run the model, but this is not what CCC requested. What CCC requested is the mode choice model's "calibration report", which explains how the model was calibrated, the derivation of the key parameters, and describes the model itself. MTA's ridership consultant knows the difference between these two documents, however it is possible that no one at MTA does.

However, this document does confirm that the MWCOG/AECOM mode choice model uses "geographic-specific bias constants", which violates current FTA New Starts policy. This further confirms that the AA/DEIS ridership and user benefit estimates will not be accepted by FTA for any subsequent New Starts funding application. These figures will have to be recalculated for that application, most likely using a modified version of the MWCOG/AECOM model.

#15. To the extent that the MTA recalibrated the MWCOG/AECOM Transit model, please provide the calibration report, including all mode choice coefficient values.

MTA provided a two-page table showing the final calibration target values for the year 2000, which is not what CCC requested. This is by itself not a calibration report, nor does it document any coefficient values. MTA's letter confirmed that no such calibration report exists. This means that the MWCOG/AECOM travel forecasting model was not recalibrated for this study. This means that the model's estimates of transit usage in the study area were not checked at the study's start and the model's parameters were not adjusted to improve the accuracy of the estimates. This recalibration is commonly performed at the start of such studies, in order to enhance the credibility of the forecasts. The fact that the model was not recalibrated for this study casts doubt on the credibility of the ridership forecasts.

#16. Please provide the model script files, all necessary input files, and all necessary supplemental programs to replicate the model run that represents the final calibration scenario of the mode choice model for this project. That is, the calibration run of the model immediately prior to its use in this study.

MTA declined to respond to this request, saying that this information is "proprietary" as it was developed outside of any contractual arrangement with the MTA. Although it may be true that the travel model was created by a private consultant on a non-MTA contract, the development of this model was financed entirely with public funds, so all materials pertaining to the model should be in the public domain. In addition, since MTA has relied on this model to prepare forecasts for an AA/DEIS, it seems inappropriate for MTA to claim that the model is somehow proprietary and that its

description cannot be disclosed. Without the release of the requested information, it is impossible to adequately and independently review the assumptions and reasonableness of the AA/DEIS' forecasts. It would also be inappropriate for MTA to rely on an analysis procedure to which it does not have access, for its own review purposes.

#17. Please provide the electronic workpapers used to develop the estimate of transit link speed for each alternative described in Section 2 of the *Travel Demand Forecasting Technical Report*.

MTA provided a paper copy of selected tables from the *Travel Demand*

Forecasting Technical Report, which is not what CCC requested. MTA provided the output from the transit speed calculation, which was already shown in the *Travel Demand*

Forecasting Technical Report. What CCC requested is the input data used to produce the tables they sent. This includes MTA's assumptions on average running speed for light rail transit (LRT) and bus rapid transit (BRT), top speed, station dwell time, vehicle

acceleration rate, and deceleration rate, among other things. The fact that station-to-

station transit Time and Speed are shown in the DEIS to the nearest 0.1 minute and 0.1

mph, plus my experience in similar studies, clearly indicates that someone applied a

fairly detailed set of calculations to estimate the time between stops. CCC is asking to see those assumptions and calculations (or whatever methodology they used).

#18. Please provide all workpapers supporting the figures shown in Table 3-58 ("Non-Included Attributes") in the *Travel Demand Forecasting Technical Report*.

MTA provided a paper copy of a table that provides more detail of the

figures in Table 3-58 of the *Travel Demand Forecasting Technical Report*. However, this

response is incomplete in that it does not provide documents sufficient to show how these figures were obtained. The figures in MTA's response show the benefit of each BRT and LRT alternative to prospective users, over and above any time and cost savings. These benefits are subdivided into "guideway-like characteristics", "span of good service", and "passenger amenities", but this subdivision is not explained. Also, the MTA response contains an entry labelled "IVT coefficient" whose purpose is unclear. The figures in this table are a key factor in the estimation of future transit trips and CCC would like to clarify to what extent these figures were derived from actual experience in other areas, or were simply guessed at for the purposes of this study.

#19. For each alternative described in Section 2 of the Travel Demand Forecasting Technical Report, please provide the following AECOM Transit model input files:

- a) Zonal walk times and percent walk to transit;
- b) Highway networks and transit line files;
- c) MWWOG (Metropolitan Washington Council of Governments) station files;
- d) Sidewalk links;
- e) Park-and-ride links;
- f) Transit station connector links; and
- g) Any other special links.

MTA declined to respond to this request, saying that no responsive document exists. CCC is well aware that these items generally do not exist as paper documents. These are important input computer files to the travel forecasting model. They define each of the six tested BRT and LRT alternatives. CCC sought this information in order to review the assumptions for these alternative scenarios. Without

this information, it is impossible to evaluate the reasonableness of the scenario

descriptions.

At CCC's request, I provide on the following pages a very brief overview of the travel demand forecasting procedure that is typically used in New Starts projects.

CCC's Request Nos. 14 to 19 are directed at obtaining information necessary to determine how MTA implemented these general steps in the AA/DEIS and how it generated the results summarized in the AA/DEIS and the *Travel Demand Forecasting Technical Report*.

Brief Overview of Travel Demand Forecasting

The transit ridership and auto traffic forecasts reported in the AA/DEIS document were made using what is commonly called a "four-step model". The Washington region has been geographically divided into about 1,500 "traffic analysis zones" which are each roughly the size of neighborhoods. All travel is described as occurring between these 1,500 locations. In recent years, a fifth step has been added to the process to describe temporal patterns. These steps are as follows:

1. Trip Generation

This step estimates the total number of trips made from each zone and to each zone, stratified by trip purpose. The purposes most commonly used are work, shop, other, and a special category called "non-home-based", representing trips between non-home locations. In the MWCOG model, a separate process is used to estimate other types of trips: school, visitor, taxi, and truck. These trips represent trips by all modes of travel, on an average weekday. The trips from a zone are usually calculated via a look-up table that applies different trip rates per household to the number of households stratified by criteria such as size and income. The trips to a zone are usually calculated with a linear regression model that is based on employment by type (office, retail, industrial, other) and the number of households. The output of this step is an electronic file showing the trips from and to each zone by purpose.

2. Trip Distribution

This step estimates how many of the trips from each zone will go to every other zone. The calculation is stratified by trip purpose and sometimes household income. Typically, a "gravity model" is used, in which the number of trips between zone I and zone J is a function of the trips leaving I, the trips entering J, and the I-to-J travel time. The output is several sets of "trip tables", zone-to-zone matrices showing the number of trips between each pair of zones. These tables are very large and are thus maintained only as electronic files. Fractional trips are allowed.

3. Mode Choice

This step splits the total number of trips between each zone pair by the travel mode used. The modes most commonly analyzed include: driving alone, carpool, transit, and non-motorized travel (walk/bike). Often, sub-modes are used to subdivide the main modes. For example, transit trips could be further split by local bus, express bus, and rail. More detailed splits are also possible. The split uses a "logit model" which says that the percentage use of a mode is based on an exponential function of the traveller's household income and the trip purpose, as well as that mode's travel time, cost, and other unquantified factors, compared to those of the other modes. The output of this step is more trip tables, showing the zone-zone travel flows by mode.

4. Time of Day

In this step the total weekday travel by travel mode is subdivided by time period (usually three to five periods). This is based on simple factors derived from a home-interview travel survey. These time splits are assumed to be valid for the future. The output of this step is more trip tables, showing the zone-zone travel flows by mode and time period.

5. Assignment

This step determines which (auto and transit) route will be used between each zone pair, allocates the trips to that route, and sums the trips for all zone pairs on each segment of the roadway system for autos and each segment of the transit system for transit. These routes are selected generally so as to minimize the tripmaker's time, subject to the constraint of the capacity of each segment of the transportation system. In the case of transit service, travel time is calculated separately for each part of the trip: walking (or driving) from the origin to the first transit stop, waiting for the vehicle, riding on the vehicle, walk and wait time to transfer to subsequent vehicles (if necessary), and walking from the last stop to the destination. Usually, this step is performed separately by time period and the results summed by segment to represent total weekday travel. The principal output of this step are electronic files showing the weekday volume of travel by vehicles on the roads and by passengers on each transit route.

VERIFICATION

STATE OF SOUTH CAROLINA
AIKEN COUNTY

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)
)
ss:

I, William G. Allen, verify that I have read the foregoing Statement, know the contents thereof, and that the same are true as stated to the best of my knowledge, information and belief.

William G. Allen

Subscribed and Sworn to before me
this 17 day of February, 2009.

James R. 88
Notary Public

My Commission expires: April 20, 2015

- RECORD #1424 DETAIL

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Last Name : Pillote
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Submission Content/Notes : Good evening. My name is Bob Pillote, that's B-O-B, P-I-L-L-O-T-E. I'm a member of Columbia Country Club where I serve on the board of governors and I'm appearing here tonight on the club's behalf.

In addition to the statement we are making at this hearing, we will also be submitting detailed written comments before the close of the comment period. But tonight I simply want to highlight a few critical points based upon our review of the Draft Environmental Impact Statement to date.

First, we all know that the D.C. Metro area faces major traffic congestion problems. Many assert that the Purple Line will help solve this problems. However, the DEIS candidly admits that construction of the Purple Line will have no significant impact in reducing regional traffic congestion.

Second, the cost of constructing the Purple Line will be substantial and the DEIS acknowledges that the state share of monies needed to fund the construction of the project and its ongoing operation and maintenance will most likely have to be raised in the form of new state taxes. This comes at a time when both the county and state are making drastic cuts and expenditures, including transportation services in order to balance their budgets.

The club submits that it does not make any sense as a matter of sound transportation policy or sound fiscal policy to impose significant, new taxes to fund a project that will not reduce regional traffic congestion. In fact, if a light rail system is built, increased development of Chevy Chase Lake and similar areas will increase traffic congestion along Connecticut Avenue and other major corridors.

Third, the DEIS asserts that the purple is cost justified under FTA funding formulas. Based upon our initial review, it appears that MTA may have grossly understated project cost and grossly overstated claimed project benefits. Also, much of the detailed information underlying MTA's calculation of project cost and benefits has not been disclosed in the DEIS or the accompanying technical reports.

In a letter we submitted yesterday, the club has requested the MTA to produce the missing information for public review.

Finally, the DEIS asserts the construction of the Purple Line along the Georgetown Branch right-of-way west of Connecticut Avenue will not harm the club or the trail. Both conclusions are wrong. In fact, construction of the Purple Line will have a major negative impact on the trail and will have significant adverse impacts on our historic club. We join our neighbors and the thousands of trail enthusiasts in opposing the Master Plan alignment. Thank you.

- RECORD #413 DETAIL

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Last Name : Zakai

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Email Address :

Submission Content/Notes : Please build the Purple Line as light rail, not just another bus line.

- RECORD #1066 DETAIL

First Name : Eric
Last Name : Peek
Business Name : Coquelin Run Citizens Association
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State : MD
Zip Code : 20815
Email Address : PEEK@MRIS.COM
Submission Content/Notes : Dear Governor O'Malley,
MTA Planning Director Ratcliff,
County Executive Leggett,
Chairman Hanson,
Council President Andrews,

We wanted to convey our concern about the proposed alignment for the Purple Line. There have been numerous meetings and Public forums by MTA that try to show that the Purple Line will be of minimum impact and provide much needed transit to our community.

Most of the residents of the Coquelin Run Citizens Association are very much opposed to the destruction of our most valuable natural resource in our community. There are many other more workable and less expensive alternatives that would address the primary problem of transit, rather than the creation of a small Kentlands type community in North Chevy Chase.

We have spoken at length with Senator Madaleno and Delegate Waldstreicher. Both have told us that the State Senate and Delegates will be meeting in January of next year to cut over a billion dollars from the State budget. I don't understand how a project that we feel is primarily planned to increase development rather than solve a transit problem would be a good expense of scarce State and County funds.

We are not against solving the transit problems, we want it done in a way that will not be immediately obsolete. This is also combined with the lack of ridership numbers necessary to obtain Federal Funds. Please consider other more practical plans proposed by Councilmember Elrich to use existing roadways with dedicated bus lanes during rush hours.

The governments are feeling the pinch that taxpayers have been feeling for several years now. We are one of the most highly regulated and restricted and taxed municipalities in the country. When the money is not there it is important to look at other more reasonable alternatives.

The most disturbing thing about the Purple Line Plan is that no regard is given to the existing trees and the enjoyment that our residents derive from the Trail.

Eric Peek,
President
Coquelin Run Citizens Association
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8717 Susanna Lane
Chevy Chase, Maryland 20815

- RECORD #1118 DETAIL

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Submission Content/Notes : E-U-L-O-I-S C-L-E-C-K-L-E-Y. Good morning. My name is Eulois Cleckley and I'm testifying today in support of the Light Rail Alternative for the Purple Line.

Currently I serve as the Executive Director of the DeMarche Alliance, a nonprofit organization that focuses on educating traditionally under served, low-income and minority communities around transportation issues.

In order to improve the awareness of this specific project, the DeMarche Alliance has worked extensively with several organizations to provide outreach to communities and residents along the corridor. Focusing on those under served communities in the central and eastern portions of the alignment, i.e., Long Branch, Tacoma Park, Silver Spring, Riverdale, etc.

Numerous community meetings were held and information was passed out to new locations to include community centers, apartment complexes, county libraries, and retail establishments. The majority of the residents reached were apartment tenants, as over 60 percent of the residents along the corridor are renters and 54 percent are ethnic minorities according to the DEIS.

This method of outreach provided an opportunity for these populations to voice their opinions and concerns as well educate these residents on further ways to be engaged in the planning process.

As a result of our outreach we found that many residents after attending a meeting or receiving information grasped the conceptual plan and were holistically in favor of the project. Over 150 participant signatures and 25 statements have been made in support of the light rail version of the project thus far.

However, several conclusions are apparent. Overwhelming, residents believe that the current travel conditions make trips to work and entertainment centers west and east along the corridor, arduous.

Transit users are restricted to buses which provide long commutes and wait times due to traffic and inconsistent bus schedules. For example, it takes Prince George's County residents 11 percent longer in commute times to work compared to the residents of Montgomery County according to the latest census numbers.

Many residents in these communities have no vehicles or use transit extensively. For example, several elderly residents from the Park Ritchie Apartment Complex in Tacoma Park either take the Ride-On Bus or the J4 Metro bus line to get to Silver Spring to pick up essentials.

This simple trip can take up to 45 minutes to an hour including wait time. A Light Rail option is expected to decrease travel times along routes that residents already take by approximately 30 percent.

Residents saw more value in a Light Rail Option other than a Bus Option as well. The overall feeling was the bus alternative proposed to operate along the route will travel along side passenger traffic, thereby providing no additional relief to congestion.

Ultimately residents are truly hungry for better communities, better access to jobs, and decent amenities. For example, residents in Riverdale, feel left out because of the lack of variety of retail establishments and good paying jobs.

Prince George's County has 262,000 jobs compared to 406,000 jobs in Montgomery County according to the latest census. An according to the Draft Environmental Impact Statement 21 percent of the residents along the corridor rely on transit to get to work.

The Purple Line will help ad Prince George's County's vision to create technology corridors resulting in potential job opportunities closer to their residences. Overall. And I'm finishing up. Overall, after talking to various communities and residents, the elderly, the disabled, black, white, Hispanic, Asian, Ethiopian, and low-income citizens, the theme is the same. The Purple Line is a great idea and it's ultimately needed.

Residents of traditionally overlooked populations want health care facilities, a safer environment, reliable and decent transportation. Simply stated, the Purple Line is very good and it's a viable choice.

- RECORD #2854 DETAIL

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Submission Content/Notes :
Attachments : EBCA Purple Line DEIS.pdf (185 kb)



EAST BETHESDA CITIZENS ASSOCIATION (EBCA) COMMENTS ON THE MARYLAND TRANSIT ADMINISTRATION'S DRAFT ENVIRONMENTAL IMPACT STATEMENT/ALTERNATIVE ANALYSIS (DEIS) FOR THE PURPLE LINE TRANSIT SYSTEM

JANUARY 14, 2009

INTRODUCTION: EAST BETHESDA'S CRITICAL LOCATION AND CONCERNS

EBCA is one of the oldest and largest citizens associations in Montgomery County. Established in the 1930's we represent over 1,200 households and approximately 5,000 residents.

Our community is sandwiched between the two potential Purple Line route alignments: the Master Plan alignment on the Georgetown Branch Trail forms our neighborhood's eastern boundary, while the Jones Bridge Road alignment forms our northern boundary. Consequently, the association is very concerned with potential Purple Line routes and designs and how the MTA has assessed the significant potential environmental impact on our neighborhood.

The DEIS seeks to identify impacts and propose mitigations for potential adverse environmental consequences of the various transit system alternatives. We applaud this first step. EBCA believes, however, that MTA has generally failed to provide in the DEIS explanation or evidence of sufficient safeguards against the Purple Line negatively impacting East Bethesda. Though the EBCA has long maintained a policy of opposing any project that would degrade our residents' use of the Georgetown Branch Trail as a hiker/biker byway, this does not necessarily mean that any mass transit on the Master Plan Alignment would be opposed; rather, EBCA seeks assurances and fully funded measures that would guarantee that a well-landscaped, well-lit trail of sufficient width and separation from the mass transit system can be constructed and maintained. At present, the DEIS does not provide confidence in these regards.

Further, we find the MTA's analysis of construction-related impacts – noise, dust, denial of trail access, etc. – far too brief and lacking in detail. Finally, the DEIS does not adequately address noise and air other impacts attendant to the long-term operation of a transit system on the Master Plan Alignment.

REQUEST 1: EBCA REQUESTS GREATER DETAIL, INCLUDING ON DESIGN AND FUNDING, REGARDING THE PROPOSED REPLACEMENT TRAIL IF A PURPLE LINE MASS TRANSIT SYSTEM IS TO RUN ON THE MASTER PLAN ALIGNMENT.

The specific LRT and BRT proposals in the DEIS along the Master Plan alignment would change the nature of the Georgetown Branch Trail forever. Yet, the proposed replacement trail is ill defined, under-designed, and most importantly, not funded.

The present Georgetown Branch Trail is enjoyed by our residents as an urban green space and nature corridor, as a linear park upon which many of our children first learned to ride a bicycle, as a quiet jogging path, and as a commuter route for cyclists and walkers. In many respects, the trail is East Bethesda's public commons. Therefore, our primary concern is that the proposed replacement trail should serve as many, if not all, of the functions of the existing trail.

A. Trail Funding Must Be Guaranteed Before Any Alternative is Approved and Ground Is Broken

The most shocking omission in the DEIS is the lack of dedicated funding for the trail, which MTA assumes would come from Montgomery County. EBCA is gravely concerned that this assumption reflects the second-class status of the trail in the Purple Line project relative to the transit system despite the many positive impacts the trail has had on so many people's lives in our area. Our concern becomes all the more acute given that we are entering a period of budgetary restraint. Yet, there is no guarantee that even if a transit system is built, a trail will also be built. Notwithstanding statements by MTA and county officials that the trail is an integral part of the project, EBCA is firmly convinced that if there is no money, there will be no trail. One need only look to the Inter-county Connector project, which at one time promised an adjacent trail that was later shelved in major part for want of funding, which would have come entirely from Montgomery County.

Please also consider the Capital Crescent Trail. This trail is being loved to death: at times there are too many users for its width; snow not cleared in winter; its cracked and uneven surface has long needed to be repaved; its root bumps and frost heaves need to be ground down, and; it needs to be widened. Yet all authorities responsible for the trail say the same thing: none of these things can be done because there is no money. EBCA refers you to the recent report by David Dionned of Integrated Trail Management that was commissioned by the county parks department. It describes in greater detail the current deficiencies of the Capital Crescent Trail. These design deficiencies are presently engineered into the Georgetown Branch replacement trail. MTA and Montgomery County has a chance to build a trail right, from the start. Neither MTA nor Montgomery County should ignore this opportunity.

The Capital Crescent Trail problems also highlight that the requirement of guaranteed funding is not limited to the trail's construction, but also to its maintenance in perpetuity.

B. Trail Width Should be Sixteen Feet and Accommodate Lanes for Faster Users

The replacement trail ought to serve all of the purposes of the present trail. Chief among them is the need to accommodate many and diverse users traveling by different modes and at different speeds. Indeed, the Georgetown Branch Trail is no less a commuter thoroughfare than the mechanized transit systems proposed to be erected upon it.

The DEIS refers to the County Standard 10-foot wide trail. This is plainly insufficient. The current Capital Crescent Trail width varies from 8-12 feet. That width has proven too narrow, the result of which has been occasional severe accidents and frequent overcrowding. EBCA believes that even the twelve-foot width, as proposed by several other local organizations, would only be a stop-gap, requiring future widening at greater expense.

Thus, EBCA suggests a trail width of sixteen feet. Examples of trails this wide, which in most cases include a separate lane for faster users are the Cushman Trail, Pierce County, Washington, the West Orange Rail Trail, Orange County, Florida / Cady Way Trail, Orlando, Florida, the Lakelands Trail, Hamburg Township, Michigan, the Northeast Diagonal Trail, Minneapolis, Minnesota, and the Maumee River Trail, Toledo, Ohio.

C. Trail Amenities: Landscaping, Lighting, Striping

Landscaping: The current trail is a quiet, tree-lined, natural haven and wildlife corridor. We understand that a replacement trail running alongside a major mechanized transit system will not be remotely similar. We note that the DEIS expects vegetation to be provided in large part by adjacent property owners and that such would maintain the current trail's "tree cover and visual character." This suggestion borders on the ludicrous. One adjacent property owner may plant tall trees along the back of his property, while another may pave the back of his lot and store rusting cars there. Also, one presumes that tall, overarching trees will not be permitted if the LRT plan is selected because they could interfere with the catenary wires. Thus, the replacement trail is destined to be much more urban in character. The DEIS should have recognized this openly. The Purple Line should specifically include landscaping to render the replacement trail as green and leafy as possible. EBCA also requests greater clarity on how the wildlife corridor that the present trail represents would be maintained.

Lighting: A key to the new trail being safe would be lighting. EBCA believes that the trail need not be fully lit, but that periodic lamps or lit zones would enhance the trail's use, especially during the evenings and the Winter months.

Striping: To accommodate the maximum number of users safely, the trail should be striped. Ideally striping would designate a lane for faster moving users. Essential, however, would be striping to divide the directions of travel and striping that would mark the trail's edge. The rationale is identical to that for automobile roadways. Every effort should be made to render the replacement trail as safe as any other public byway.

D. Trail / Transit Separation: The Ten-Foot Proposed Buffer is Too Small

EBCA believes that as currently proposed the trail use experience will be severely diminished by virtue of having a large train or bus whoosh by every three minutes. Therefore, the buffer between the gravel edge or wall of the transit system and the trail should be as wide as possible and landscaped to provide the densest possible vegetation screen separating the two.

E. Trail Interconnect is Lacking

The misleading mantra of some groups favoring mass transit on the Georgetown Branch Trail has been, “Build the Rail, Complete the Trail,” meaning that constructing the Purple Line would result in a completed hiker/biker trail. Yet, the DEIS calls only for a trail into Silver Spring. Critically, it is lacking interconnect to other trails in the region, several of pass through Silver Spring near the proposed Purple Line. Were completing the trail truly a priority, then interconnect between the Purple Line trail and these other trails, especially the Sligo Creek Trail, would have been contemplated and addressed. EBCA requests that MTA provide connections between the Purple Line Trail, Metro’s Red Line, and other area trails.

REQUEST 2: EBCA REQUESTS THAT THE MTA APPLY THE BEST AVAILABLE TECHNOLOGY TO ELIMINATE IMPACTS ON EAST BETHESDA DURING CONSTRUCTION. EBCA ALSO REQUESTS THAT MTA AND MONTGOMERY COUNTY COMPENSATE EAST BETHESDA FOR THESE CONSTRUCTION-RELATED HARDSHIPS.

Regardless of the alignment chosen or the mode of transport, East Bethesda will suffer inordinately from the impacts of constructing the Purple Line. EBCA therefore requests that MTA apply the best available technology to eliminate construction-related impacts, which may last as long as six years according to some estimates. These impacts will include: years of denied access to the Georgetown Branch Trail (assuming that alignment is chosen), noise from construction, construction equipment and construction vehicles, increased traffic through the neighborhood of construction vehicles and workers, dust from construction, construction-related runoff, and the potential use and storage of hazardous materials.

EBCA notes that its construction related hardships are not offset by improved transit services or increased mobility and accessibility, as claimed in the DEIS. These improvements are slight at best given that no stops are planned in our neighborhood and that the vast majority of our neighborhood’s mass transit users commute toward downtown Washington and not eastward within the county.

Because of these construction related hardships EBCA requests that MTA and Montgomery County establish a fund for the exclusive use of East Bethesda. East Bethesda would use these funds to, among other things, improve the playgrounds and playing fields at Lynbrook Park, add park benches and landscaping in common areas throughout the neighborhood, and create and maintain new park areas. EBCA looks forward to working with MTA and Montgomery County toward the establishment and implementation of this fund.

REQUEST 3: EBCA REQUESTS THAT THE MTA APPLY THE BEST AVAILABLE TECHNOLOGY TO MAKE TRAINS IN THE LRT ALTERNATIVES RUN AS QUIETLY AS POSSIBLE AND FOR THE FEIS TO DESCRIBE THIS TECHNOLOGY IN DETAIL.

The Purple Line will run along East Bethesda's boundaries. Our residents, therefore, have an interest greater than many others in the county for the transit system to be as quiet and unobtrusive as possible. The DEIS contemplates a combination of vehicle skirts, wheel covers and barrier walls to achieve noise reduction. EBCA requests whether this is the best available technology that would still not constitute an eyesore. EBCA does not believe we have to choose between a quiet system and an ugly system. MTA often showed photographs of systems using "grass tracks" as a noise mitigation technique. Yet the DEIS ignores this option. Please explain.

REQUEST 4: EBCA REQUESTS THAT THE MTA APPLY THE BEST AVAILABLE TECHNOLOGY TO MITIGATE ANY VISUAL IMPACTS DUE TO THE CONSTRUCTION AND OPERATION OF A TRANSIT SYSTEM ON THE MASTER PLAN ALIGNMENT.

The DEIS proposes landscaping, fencing and other screening, such as earthen berms to mitigate visual impacts. These are inadequately described. In the case of East Bethesda, were a transit system to run along the Master Plan alignment, tall retaining walls would likely have to be constructed facing our neighborhood. Please explain how to minimize the visual impact of these.

Because the construction of a transit system will create substantial new additional impervious surfaces and likely involve tall retaining walls, EBCA seeks that MTA explain how these drainage challenges will be met. EBCA notes that were a BRT system built, employing existing roads, no additional impervious surfaces would be created.

REQUEST 5: EBCA REQUESTS THAT THE MTA APPLY THE BEST AVAILABLE TECHNOLOGY TO MITIGATE ANY AIR IMPACTS DUE TO THE CONSTRUCTION AND OPERATION OF A TRANSIT SYSTEM ON THE MASTER PLAN ALIGNMENT.

EBCA questions the DEIS assumptions about improved air quality from reducing auto trips as a result of the Purple Line. Whether BRT or LRT, these systems have to be fueled. In the case of BRT, the fuel would be diesel, which apparently is relatively cleaner than the equivalent number of vehicles. For the LRT, the fuel would be electricity generated primarily at coal-fired power plants whose exhaust plumes cover our area. EBCA is concerned that the DEIS and MTA in its rhetoric have miscalculated the total energy budget for the proposed alternatives, erring on the side of underestimating the impact from light rail systems. EBCA, therefore requests that MTA guarantee that if light rail is constructed that it run in significant part on electricity generated from clean sources, such as solar or wind power. If BRT is to be constructed, then a similar guarantee should be provided that the fuel be derived in significant part from biodiesel and that the cleanest possible (least-emitting) diesel engines are used.

EBCA notes that the construction of transit on the Master Plan alignment would result in the clear-cutting of hundreds of mature trees. A mature tree can absorb nearly 50 lbs. of carbon dioxide per year, produce significant quantities of breathable oxygen, mitigate runoff, and contribute to local cooling. EBCA requests how the loss of these trees will be mitigated.

REQUEST 6: EBCA REQUESTS GREATER EXPLANATION AND JUSTIFICATION OF THE EXPENSE FOR THE MEDIUM INVESTMENT LRT ALTERNATIVE THAT HAS BEEN ENDORSED BY MONTGOMERY COUNTY PLANNING STAFF.

A. Specific County-Borne Expenses

Not only does the DEIS contemplate that all expenses for the construction and maintenance of the replacement of the trail would fall on the taxpayers of Montgomery County, the DEIS is unclear about operation and maintenance costs for the LRT system, potential cost overruns during construction, landscaping, station construction and maintenance costs, the Bethesda Metro stop interchange, and additional policing. In short, EBCA is not convinced that the DEIS has contemplated the full potential burden of the endorsed LRT system on the taxpayers of Montgomery County and EBCA.

EBCA notes that our residents are already among the most heavily taxed in Montgomery County due in large part because property valuations are high near transit. We are concerned that the new transit system, could impose additional tax costs. We seek the County and MTA to lay out more clearly what will be the full costs for the system.

B. Non-County Costs

The lion's share of the burden for the Purple Line would fall on authorities other than Montgomery County, i.e. the state and federal governments. Yet all of these are funded in part by EBCA members as taxpayers. Two assumptions are critical: (1) that the fares for the MNCPPC staff endorsed LRT would be insufficient to cover operating costs, and (2) that the Purple Line would not, by MTA's admission, result in significant numbers of cars being taken off of our congested roadways. In light of these truths, EBCA is concerned that the LRT options for the Purple Line have the potential to pose a continuing financial burden on taxpayers yet without significant benefit to our overall transit requirements.

In particular, EBCA has not been convinced that either the predicted ridership or the projected time savings merit the construction of any of the LRT options or even the high investment BRT option. EBCA seeks the MTA to provide greater justification that MNCPPC staff endorsed LRT plan optimizes public investment.

REQUEST 7: EBCA REQUESTS GREATER JUSTIFICATION FOR (A) EXCLUDING THE EXPANSION OF THE WALTER REED NATIONAL NAVY MEDICAL CENTER FROM ITS APPARENT ROUTE CONSIDERATIONS, AND (B) WHY LRT ALTERNATIVES ARE FOR A TWO-TRACK SYSTEM WHEN THE PROJECT ORIGINALLY CONTEMPLATED A SINGLE TRACK FOR ENVIRONMENTAL AND FISCAL REASONS.

EBCA finds the conclusion given in the document, Implications of the Defense Base Realignment and Closure (BRAC) Process, “[I]mpacts of BRAC on travel in the Bethesda area are notable more for the additional delays expected on area roadways than for the potential contributions to Purple Line ridership,” difficult to comprehend. Please provide more data to back up this conclusion. EBCA is also concerned that in public gatherings MTA told EBCA members that BRAC would have no appreciable impact on the region’s mass transit. Yet the DEIS presumes that BRAC will result in increased ridership on the Purple Line if the Jones Bridge Road BRT is built. Please reconcile this change.

EBCA also seeks additional justification for a two-track system, which originally was not contemplated. A single-track system could lessen many of the adverse impacts discussed herein.

NOTE: EBCA EXPRESSES ITS DISAPPOINTMENT WITH THE PURPLE LINE ADVISORY GROUP AND OTHER ASPECTS OF THE PUBLIC VETTING PROCESS.

The Purple Line Advisory Group (MPAG) ended up being, in effect, a debating society minus the debate. It had no mandate other than to meet and discuss. The members never voted on any issue and never reached any conclusions. The MPAG merely served, then, to both flesh out details in documents otherwise available to the general public on the internet and to be a forum for venting emotions. I applaud that the county took pains to produce experts who could provide additional information, but even then, this process was flawed. In particular, I point to the presentation on January 22, 2008 MPAG meeting, which was given by MTA ridership forecasting expert, Greg Benz, who had assumed that everyone in the room favored one of the LRT options. He, therefore, spoke almost exclusively about how to cook the ridership numbers to justify building such a system – manipulating figures to produce the highest possible “Total User Benefit” figure for LRT. He saw instances of past poor modeling as successes as long as ridership eventually reached economically sustainable levels. Houston and Charlotte were examples he gave, nonetheless noting that the forecasts were wrong. He also noted that his computer programs could not accurately predict the Metro’s Red Line. This did not inspire confidence.

In short, EBCA felt that the MPAG process was intended from the start to consist of a lot of talking, but not to amount to anything of consequence. In effect, the MPAG served to allow MTA and county officials to say that there was public input, but without the MPAG’s input having any impact whatsoever.

CONCLUSION:

EBCA represents a pro-mass transit neighborhood. Indeed, even among our neighborhood's trail users a proportion favors the construction of a mass transit system on the trail. But EBCA knows that the Devil is in the details and that the DEIS is short on critical details regarding the potentially severe impacts that our neighborhood will suffer. Our concerns, as summarized above, should be given extra weight given East Bethesda's critical location and number of residents. This project is in our backyard. We are not saying "no." Rather, we are saying that MTA ought to do it right, exploring every possible alternative fully and without making assumptions that favor one alternative over another. We are also terribly concerned about the lack of dedicated funding for a proper replacement trail. This issue is a line in the sand for our neighborhood. Unless and until such funding is guaranteed and a better trail design conceived and presented, EBCA will continue to vigorously oppose any mass transit project on the Master Plan alignment.

Sincerely,

David Saltzman, First Vice President
East Bethesda Citizens Association

- RECORD #1344 DETAIL

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Submission Content/Notes : It's David Saltzman, D-A-V-I-D, last name Saltzman, S-A-L-T-Z-M-A-N. There's two of us here tonight, thanks. You all set? Okay. Thank you for giving me the opportunity to express the perspectives of the East Bethesda Citizens Association on the suggested Purple Line alternatives. EBKA is one of the oldest and largest citizens associations in Montgomery County, established in the 1930's, we represent over 1,200 households and approximately 5,000 residents.

Our community is sandwiched between the two potential transit alignments. The Master Plan Alignment on the Georgetown Branch Trail forms our eastern boundary, while the Jones Bridge Road Alignment forms our northern boundary. Consequently, the association is very concerned with the potential Purple Line designs and how the MTA has accessed the significant potential environmental impact on our neighborhood.

We believe that the MTA has failed to accurately assess the impact on our community. The EBKA has long opposed any transit plan that degrades the utility of the Georgetown Branch Trail, which is enjoyed by our residents as an urban green space and nature corridor, as a linear park upon which many of our children first learn to ride a bicycle, as a quiet jogging path, and as a commuter route for cyclists and walkers. In many respects, the trail is east Bethesda's public commons.

The specific LRT and BRT proposals favored in the DEIS along the Master Plan alignment would not merely degrade the trail, they would obliterate it. The proposed replacement trail is ill-defined, under-designed and most importantly not funded. Thus, we can not yet endorse it as a worthy substitute. The most shocking omission in the DEIS is the lack of dedicated funding for the trail, which MTA assumes would come from Montgomery County. EBKA now asks the county and MTA where is the money? Will it be enough to build a proper trail? Will it be enough to maintain it? To light it? To landscape it? To build a few park benches along it, perhaps? Or, especially in these times of tightening budgets and rising taxes, will the county abandon the trail idea all together once the trees have been cut the transit system is built?

Therefore, unless and until dedicated funds of sufficient magnitude are procured for the construction and long-term maintenance of a proper trail, EBKA will continue to oppose mass transit along the Master Plan alignment.

Regarding the proposed trail's design, the DEIS refers to a county standard 10-foot wide trail. Yet this is the same design of the current Capitol Crescent Trail, which is plagued by problems associated with over use, crowding, accidents and confrontations. EBKA therefore recommends the consideration of a 16-foot wide trail that would accommodate separate bike lanes which is the case in five trails in different states.

The DEIS also says that tree and vegetation cover along the new trail would be provided by adjacent property owners. This is wishful thinking. One adjacent homeowner may plant tall trees along the back of his property, while another may pave the back of his lot and store rusted cars there.

Finally, we believe that the MTA dismisses the many impacts our neighborhood would suffer during construction, which includes our loss of the trails use for four to six years. Therefore, at this time we firmly are in opposition to mass transit along the Master Plan Alignment. Thank you.

- RECORD #3237 DETAIL

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Submission Content/Notes : Statement of the East Bethesda Citizens Association (EBCA) Concerning the Purple Line AA/DEIS
David Saltzman, Vice President, EBCA
Member of Montgomery County Purple Line Advisory Group
November 18, 2008

Thank you for giving me this opportunity to express the perspectives of the East Bethesda Citizens Association (EBCA) on the suggested Purple Line alternatives.

EBCA is one of the oldest and largest citizens associations in Montgomery County. Established in the 1930's we represent over 1,200 households and approximately 5,000 residents.

Our community is sandwiched between the two potential transit alignments: the Master Plan alignment on the Georgetown Branch Trail forms our eastern boundary, while the Jones Bridge Road alignment forms our northern boundary. Consequently, the association is very concerned with potential Purple Line designs and how the MTA has assessed the significant potential environmental impact on our neighborhood.

We believe that the MTA has failed to accurately assess the impact on our community. The EBCA has long opposed any transit plan that degrades the utility of the Georgetown Branch Trail, which is enjoyed by our residents as an urban green space and nature corridor, as a linear park upon which many of our children first learned to ride a bicycle, as a quiet jogging path, and as a commuter route for cyclists and walkers. In many respects, the trail is East Bethesda's public commons.

The specific LRT and BRT proposals in the DEIS along the Master Plan alignment would not merely degrade the trail; they would obliterate it. The proposed replacement trail is ill defined, under-designed, and most importantly, not funded. Thus, we cannot yet endorse it as a worthy substitute.

The most shocking omission in the DEIS is the lack of dedicated funding for the trail, which MTA assumes would come from Montgomery County. We now ask the county, where is the money? Will it be enough to build a proper trail? Will it be enough to maintain it, to light it, to landscape it, to build a few park benches along it? Or, especially in these times of tightening budgets and rising taxes, will the county abandon the trail idea altogether once the trees have been cut and the transit system is built?

Therefore, unless and until dedicated funds of sufficient magnitude are procured for the construction and long-term maintenance of a proper trail, EBCA will continue to oppose mass transit along the Master Plan alignment.

Regarding the proposed trail's design, the DEIS refers to a county standard 10-foot wide trail. Yet this is the same design of the current Capital Crescent Trail, which is plagued by problems associated with overuse – crowding, accidents and confrontations. EBCA therefore recommends the construction of a 16' wide trail that would accommodate separate bike lanes, which has been done in at least 5 other states.

The DEIS says also that the tree and vegetation cover along the new trail would be provided by adjacent property owners. This is wishful thinking. One adjacent homeowner may plant tall trees along the back of his property, while another may pave the back of his lot and store rusting

cars there.

Finally, we believe that the MTA dismisses the many impacts our neighborhood would suffer during construction, which includes our loss of the trail's use for 4-6 years.

Therefore, at this time, we remain firmly in opposition to mass transit along the Master Plan alignment.

Attachments :

Wrttn Sttmnt. EBCA.pdf (339 kb)



**Statement of the East Bethesda Citizens
Association (EBCA)
Concerning the Purple Line AA/DEIS**

David Saltzman, Vice President, EBCA
Member of Montgomery County Purple Line Advisory Group

November 18, 2008

Thank you for giving me this opportunity to express the perspectives of the East Bethesda Citizens Association (EBCA) on the suggested Purple Line alternatives.

EBCA is one of the oldest and largest citizens associations in Montgomery County. Established in the 1930's we represent over 1,200 households and approximately 5,000 residents.

Our community is sandwiched between the two potential transit alignments: the Master Plan alignment on the Georgetown Branch Trail forms our eastern boundary, while the Jones Bridge Road alignment forms our northern boundary. Consequently, the association is very concerned with potential Purple Line designs and how the MTA has assessed the significant potential environmental impact on our neighborhood.

We believe that the MTA has failed to accurately assess the impact on our community. The EBCA has long opposed any transit plan that degrades the utility of the Georgetown Branch Trail, which is enjoyed by our residents as an urban green space and nature corridor, as a linear park upon which many of our children first learned to ride a bicycle, as a quiet jogging path, and as a commuter route for cyclists and walkers. In many respects, the trail is East Bethesda's public commons.

The specific LRT and BRT proposals in the DEIS along the Master Plan alignment would not merely degrade the trail; they would obliterate it. The proposed replacement trail is ill defined,

under-designed, and most importantly, not funded. Thus, we cannot yet endorse it as a worthy substitute.

The most shocking omission in the DEIS is the lack of dedicated funding for the trail, which MTA assumes would come from Montgomery County. We now ask the county, where is the money? Will it be enough to build a proper trail? Will it be enough maintain it, to light it, to landscape it, to build a few park benches along it? Or, especially in these times of tightening budgets and rising taxes, will the county abandon the trail idea altogether once the trees have been cut and the transit system is built?

Therefore, unless and until dedicated funds of sufficient magnitude are procured for the construction and long-term maintenance of a proper trail, EBCA will continue to oppose mass transit along the Master Plan alignment.

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The DEIS says also that the tree and vegetation cover along the new trail would be provided by adjacent property owners. This is wishful thinking. One adjacent homeowner may plant tall trees along the back of his property, while another may pave the back of his lot and store rusting cars there.

Finally, we believe that the MTA dismisses the many impacts our neighborhood would suffer during construction, which includes our loss of the trail's use for 4-6 years.

Therefore, at this time, we remain firmly in opposition to mass transit along the Master Plan alignment.

- RECORD #1693 DETAIL

First Name : Bob
Last Name : Colvin
Business Name : East Silver Spring Citizen's Association Board of Directors
Address :
City :
State : MD
Zip Code :
Email Address :

MCP-Chairman@mncppc-mc.org

RE: Testimony - Staff Recommendations for the Purple Line

We are troubled that the Planning Staff recommendations require a detailed analysis of the community impacts of only one of the two routes suggested for further study and not the other. We request that this disparity be rectified and that the Planning Board require the Maryland Transit Administration (MTA) to provide equitable analyses for both options.

The staff has recommended the surface route on Wayne Avenue as their preferred option and listed very specific community impacts that MTA will be required to analyze and mitigate. However, the staff is only requiring a generic "study" of a hybrid option that includes an extended tunnel under Wayne Avenue. The recommendations imply that MTA is only required to provide cost estimates for the tunnel option and no other impacts will be reviewed.

Since the AA/DEIS dismissed the tunnel option under Wayne Avenue as too expensive, it provided no analyses of the tunnel's community impacts. The tunnel option under Wayne Avenue involves tunneling under several other streets and has the potential for major impacts on the residents of East Silver Spring. We have actively participated in MTA focus groups for several years and have only received limited verbal answers to our concerns about this option. Some of these responses seem to contradict FTA standards. Therefore, it is imperative that MTA provide documentation of the impacts a tunnel would have on this community – both during construction and operation.

We ask the Planning Board to add the following specifics to MTA's required analyses for the tunnel route:

NOISE AND VIBRATION:

The tunnel under consideration begins under Georgia Avenue and continues under Silver Spring Avenue, Grove Street and Bonifant Street before it reaches Wayne Avenue. This tunnel would run under numerous homes on very narrow streets with minimal, if any, setback from the street. These homes are 50-85 years old and would be very sensitive to damage from vibrations and construction. The Staff's recommendation to study a tunnel is too broad and will result in an inadequate analysis of the impacts on these homes.

For example, MTA engineers told us on several occasions that the tunnel would be approximately 25 feet under the homes. However, FTA's 2006 Transit Noise and Vibration Impact Assessment ("FTA 2006 Assessment"), pg. 7-8 states: "Problems with ground-borne vibrations and noise are common when there is less than 50 feet between a subway structure and building foundations."

This study also reports that noise and vibration levels increase and are problematic depending on, not only the depth of tunnel, but the type of structure above the tunnel, type of track, type of wheel, etc.

How deep a tunnel is MTA planning? What types of structures, wheels, track, etc. are anticipated? How will these choices impact/mitigate noise and vibration in these homes?

VENTS/AIRSHAFTS/EMERGENCY EXITS:

According to MTA, vents/airshafts and emergency exits would be located on public property – most likely in the intersections, e.g. Grove and Thayer/Bonifant. This is a very densely populated neighborhood with very narrow streets. Therefore, noxious or hazardous fumes from these vents would linger and be more likely to permeate living quarters. What types of fumes are anticipated? What does MTA suggest to measure and mitigate this potential hazard?

CONSTRUCTION/COMPENSATION:

We have received only verbal assurances from MTA that they will not take any homes and that it will be safe for residents to remain in their homes during construction. MTA needs to document this with specific details. For example:

How realistic is this, if only 10 % of the engineering study is complete? What is the chance that unanticipated problems during construction will require the "taking" of homes?

How are homeowners/residents protected, if there is damage/injury during construction? Will the homes be bonded?

What is the process for negotiating compensation for ground rights under affected properties?

We recognize that at this late date in the process, it will be difficult to subject this route to the same public scrutiny as was available for the other routes. However, it is essential to the credibility of this project that this route be given the same scrutiny as the surface route and equitable time for public input.

We urge you to require more detailed analyses in your recommendations for MTA's further study of this tunnel route to address these impacts and to allow for an adequate public comment period after these analyses have been completed.

Sincerely,

East Silver Spring Citizen's Association
(ESSCA) Board of Directors

Bob Colvin
President

cc: County Council
MTA

- RECORD #1235 DETAIL

First Name :	Karen
Last Name :	Roper
Business Name :	ESCA
Address :	7911 Chicago Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Good afternoon. Karen Roper, K-A-R-E-N, R-O-P-E-R. I'm here today representing East Silver Spring Citizens Association or ESSCA.

All three of the proposed routes through East Silver Spring fall within ESSCA boundaries and are within one mile of one another. East Silver Spring has been identified by MTA, the planning board and our elected officials as the most difficult part of the entire proposed purple line.

It is an urban environment without a public right-of-way and without an identified route in the master plan. Any route through these neighborhoods would have considerable impacts on this community.

Unfortunately, the public discussion of the purple line has shortchanged East Silver Spring by focusing almost exclusively on traffic relief which is a relatively minor goal of this study.

After all, \$1.5 billion to remove 15,000 to 20,000 vehicle trips from our roads is hardly cost effective and cannot stand alone as a reason to build the purple line.

The emphasis on traffic has inhibited the discussion of one of the major goals of the purple line which is economic development. The issue in East Silver Spring is how much negative impact our community is expected to absorb in order to enhance the development of the Long Branch community and Langley Park/Takoma Park community.

We would like to ensure that the community impacts for all of the options for East Silver Spring are given the public attention and discussion they deserve. However, time constraints allow me to focus on only one.

ESSCA is opposed to the Silver Spring Thayer route and would like our objections to this route noted for the record.

According to the DEIS, of all the proposed routes for the purple line, the Silver Spring Thayer route has the most extensive negative impacts on the community.

This route has the most displacements, the most loss of parking, the most impact on parks, streams, forests, and the most visual impacts. All of this in a community which as reported in the DEIS, qualifies as an environmental justice area.

The impacts from the tunnel, the fly over on Piney Branch and the - means behind the elementary school were not discussed in detail. The DEIS also did not present essential analyses for the Silver Spring Thayer option that were reported for alternative routes.

Ridership numbers, travel times, traffic studies, cost estimates, noise analysis and air quality analysis were not included in the DEIS for the Silver Spring Thayer route.

Since there is not enough time left in the decision process to present these missing analysis and allow for equitable public comment, the Silver Spring Thayer alignment should be dropped from consideration immediately.

It would be unconscionable for the planning board, MTA, the county council or the Governor to choose the Thayer Silver Spring option which would have such a devastating impact on the community and absolutely no reported benefit to the purple line project whatsoever. Thank you.

- RECORD #1752 DETAIL

First Name : Thomas F.
Last Name : Jennings
Business Name : Eastern Village Cohousing Community
Address : 7981 Eastern Avenue, Unit 313
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : ENNEANINE@AOL.COM
Submission Content/Notes : Dear Mr. Leggett, Dr. Hanson, Council President Andrews, and Ms. Ratcliff:

Earlier this month the Montgomery County Planning Department staff added their voice to the growing list of endorsers of the medium Light Rail option using the Master Plan alignment and I am writing to express my support for many of the conclusions of the staff. The Planning Board will be reviewing the report on 1/8/2009 and we understand that the County Executive will be issuing a statement on the project soon thereafter, with the Council taking a position on January 27th.

We specifically support the following conclusions of the planning staff:

Only Light rail, and not bus rapid transit, can carry the heavy passenger loads foreseen for the Purple Line.

Use the Georgetown Branch alignment between Bethesda and Silver Spring;

Complete the hiker-biker trail as part of the project, including parallel routes in Bethesda through the Air Rights Tunnel and on Bethesda and Willow Avenues, and along an off-road corridor along the CSX right of way into the Transit Center in Silver Spring; aim for a 12 ft trail width wherever feasible since a trail along the tramway will be as popular as the trail west of Bethesda;

Include a stop serving Downtown Silver Spring and the Fenton Village area integrated with the new Silver Spring library;

We also support the expedited construction of the Bethesda South Entrance as a priority infrastructure project under the Stimulus program being developed by the new Obama administration.

We hope you will join us in encouraging Governor O'Malley to move the Light Rail Purple Line into construction on the swiftest possible timeline.

- RECORD #6 DETAIL

First Name : Maureen

Last Name : Jais-Mick

Business Name : Edgemoor Citizens Association

Address : 7017 Exfair Road

City : Bethesda

State : MD

Zip Code : 20814

Email Address : d.mick@verizon.net

Submission Content/Notes : I am a resident of Bethesda who has been asked by the Edgemoor Citizens Association (my neighborhood group) to represent ECA in the Purple Line Community Focus Group for our area. I would appreciate information on registering as ECA representative. Thanks. Maureen Jais-Mick

- RECORD #1444 DETAIL

First Name : Robert
Last Name : Curtis
Business Name : Edgevale Civic Assoc
Address : 4109 Edgevale Ct
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address :

Submission Content/Notes : Robert Curtis, R-O-B-E-R-T, C-U-R-T-I-S. I represent the Edgeville Civic Association and Rethinking the Purple Line and I'm for the realignment of the Purple Line along Jones Bridge Road and I've come to this conclusion for this several reasons.

First, the portion of the Capitol Crescent Trail that runs behinds the houses in our community is only 66 feet wide and therefore makes the trains very close to our houses and well as the trail users. Second, running buses along Jones Bridge Road to the medical center seems like it would accommodate the BRAC relocation which maybe wasn't in the picture in the early planning stages of the, of the design.

The concept that I want to address from an architectural point of view is that retaining public spaces are paramount to the quality of life in dense, urban areas. When we plan for public spaces, we should be looking for the use for the next 100 years or more and not just for the budget.

When traveling to other cities and other countries we marvel at buildings, parks, public spaces, that are unique and the wisdom of the architects, landscape architects and public officials who had the vision to propose these spaces and these places and put up a fight to keep them is evident. And an example that comes to mind is, for example, Central Park in New York City, designed by Frederick Lomstead or who also designed our capital grounds and many other important spaces around our county.

We really want future generations to see and experience the wisdom of keeping our Capitol Crescent Trail in tact as well as coming up with a Purple Line that doesn't trample on the existing magnificent space and then the natural habitat of the Capitol Crescent Trail. Therefore, I would support realignment. Thank you.

- RECORD #2181 DETAIL

First Name :	Verna
Last Name :	Curtis
Business Name :	Edgevale Civic Association
Address :	4109 Edgevale Court
City :	Chevy Chase
State :	MD
Zip Code :	20815
Email Address :	
Submission Content/Notes :	
Attachments :	Comment Form. V. Curtis.pdf (936 kb)



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Verna Curtis Organization: Edgelye Civic Assoc.

Address: 4109 Edgelye Ct.

City: Chevy Chase State: MD Zip Code: 20815

I/We wish to submit the following comments on this project: _____

The natural environment is very important to us as human beings. In urban Bethesda - Chevy Chase, we feel fortunate to live near a parklike hike-a-bike transit-way that provides a canopied setting for human transit. Once that is taken away, it cannot be replaced if land is used for rail, as it formerly was.

Our particular Edgelye neighborhood would be hemmed in between highway and railway and no longer the peaceful "edge" of a "vale." We like many of our neighbors are 20-year residents in a middle-class ethnically, racially, and very compatible community.

When there are other viable, cost-effective routes to provide east-west, Silver Spring to Bethesda linkage -- using buslines and/or Jones Bridge Road, we want to see those more fully explored.

Please try to coordinate with existing East-West bus lines, which are generally unreliable and inadequate. We already have an alternative to the Purple Line, let's make sure it works!

- RECORD #2610 DETAIL

First Name :	Judith
Last Name :	Nash-LeBon
Business Name :	Edgevale Civic Association
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	JNASH@CAVTEL.NET

Submission Content/Notes : Dear Sirs/Mesdames:

I am writing on behalf of the residents of the Edgevale neighborhood located along East West Highway between Connecticut and Wisconsin Avenues; a neighborhood of approximately 25 modest homes, 15 of which back right up to the trail. We have easy access to the trail using it for recreational and transportation purposes, i.e. children walking to BCC high school.

The wooded area adjoining the trail is very important to us, especially because we are located at the narrowest point in the trail. It is the buffer between our houses and the trail, giving us privacy, and mitigating noise from the trail.

Architectural drawings show a number of our houses lie only between 20 to 50 feet from the trail. One house lies only 12 feet from the trail. Stripping away the trees to put down trains will rob us of our privacy; subject us to the continuous noise of two trains running every three minutes. The DEIS has stated that we even risk having our homes shake from the passing trains.

Therefore, we strongly object to running the Purple Line along the Capital Crescent trail; trains will come much too close to our homes. This means that every three minutes trains will run from just 20 – 50 feet from our kitchens and bedrooms.

PLEASE IMAGINE YOURSELF LIVING WITH THAT.

We will be subject to:

Shaking houses
Continuous noise with no buffer of trees
Total lack of privacy
No access to the trail for biking/hiking, running errand
And Children will no longer be able to walk to school

There are transportation alternatives on the table that would not rob the area of this park and natural trail and not destroy the quality of our environment.

We DO Support establishing the Rapid Bus Transit on Jones Bridge Road which would not rob the area of the trail and its park and not destroy the quality of our environment.

The BRT would:

Be a connector between Silver Spring and Bethesda
Be a convenient route from Silver Spring to the new Medical Center
Keep the region's green space amenity
All this at a much lower cost, with far less destruction than if the Light Rail were built along the trail.

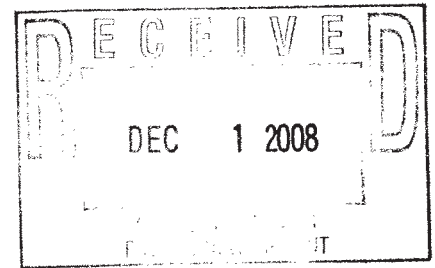
We hope you will seriously consider these thoughts. Thank you.

- RECORD #512 DETAIL

First Name : Margot
Last Name : Cook
Business Name : Forest Grove Citizens Association
Address : 1603 Myrtle Road
City : Silver Spring
State : MD
Zip Code : 20902
Email Address :
Submission Content/Notes :
Attachments : Forest Grove CA . Northmont CA.pdf (56 kb)

November 26, 2008

Michael Madden, Project Manager
Maryland Transit Administration
6 St. Paul Street, Baltimore, MD 21202



Dear Mr. Madden,

Our community associations, Forest Grove Citizens Association and Northmont Citizens Association, strongly endorse the light rail option for the proposed Purple Line bi-county mass transit connection. The light rail option would involve more initial cost than the various bus line proposals, but would also provide more flexible long-term growth potential, be more environmentally friendly, undoubtedly attract more riders, and lessen the growing user pressure on the existing North-South branches of the Metro Red Line. Although it is not being proposed as part of the Metrorail system as such, the light rail Purple Line option would most effectively serve as an extension of the overall Metrorail System in Maryland, provided that special interests do not manage to deflect the route to the Jones Bridge proposed alternative option based on bus transit.

The proposals employing various bus options all have more downside, both initially and in the long term. Constructing a dedicated "express" bus lane will be nearly as disruptive to nearby properties as any light rail construction, particularly if construction involves widening the right of way along the existing roadways to accommodate the new lane, rather than replacing an existing traffic lane. Any replacement of existing traffic lanes will have an immediate and unacceptable impact on the already congested east-west routes, and the growing traffic pressure will lead to constant commuter agitation to eliminate such bus lanes. Bus traffic, particularly if not in dedicated traffic lanes, will inevitably be subject to the same delays from congestion, traffic lights and accidents as existing bus and automobile traffic. Even dedicated lane express buses will have delays due to traffic at intersections, unless costly underpasses are constructed. Therefore, the term "express" with "bus" will be a certain oxymoron or misnomer.

Given the extensive construction of new concentrated residential and commercial development that the Maryland Counties are now committed to in the impacted areas, Maryland and the two Counties have no real option but to provide an effective East-West light rail mass transit connection. We can not allow the small but well funded groups of special interests in Chevy Chase and their spokespersons to stop or otherwise deflect this light rail option and its logical routing, nor can we be deterred by the "too costly" arguments put forward by some.

Sincerely,

Margot Cook

Margot Cook, President
Forest Grove Citizens Association
1603 Myrtle Rd, Silver Spring, MD 20902

Jean Heide

Jean Heide, Vice President
Northmont Citizens Association
9702 Saxony Rd, Silver Spring, MD 20910

- RECORD #2557 DETAIL

First Name : AJ
Last Name : Sikes
Business Name : Georgetown University Cycling Team
Address :
City :
State : MD
Zip Code :
Email Address : AJSIKES@GMAIL.COM
Submission Content/Notes : Dear Governor O'Malley,

MTA Planning Director Ratcliff
County Executive Leggett,
Chairman Hanson,
Council President Andrews,

I am the President of the Georgetown University Cycling Team. I am a competitive cyclist of around 11 years. I use the Capital Crescent as a very safe and effective route out of the city on my daily training rides. Every member of the Georgetown U Cycling Team does the same. Like all members of the community listed below, we have a great interest in this trail. We work hard to keep it nice and have been known to advocate picking up trash on and along the trail to keep the green in the greenway.

Every week, more than 10,000 hikers and bikers -- of all ages, races, ethnicities, and abilities -- use the Capital Crescent Trail between Bethesda and Silver Spring. The Trail is enjoyed by the elderly, parents pushing strollers, bird watchers, families with small children, casual cyclists, teens going to and from school, athletes in training, and daily commuters. Trail users come from all around the region.

The Trail is revered for its tranquility and natural beauty. If the Purple Line is built here, all of the mature trees surrounding the Trail would be permanently removed, and trains or buses would pass about 10' from hikers and bikers every three minutes. It would be neither safe nor attractive for Trail users to be passing each other on a narrow bike lane - about 10' from trains or buses. It would be an environmental and recreational disaster.

Great urban areas have great parks. This irreplaceable forest and continuous natural Trail provide rare and outstanding recreational opportunities that cannot be replicated anywhere else.

Please use your wisdom, vision and courage to put transit elsewhere and to preserve the Capital Crescent Trail as this region's "Central Park" -- so that we, and generations to come, will be able to enjoy this natural resource, regardless of the growth and development that takes place around us.

Thank you for your consideration.

- RECORD #2512 DETAIL

First Name :	Debbie
Last Name :	Michaels
Business Name :	President, Glenbrook Village HOA
Address :	8619 Terrace Garden Way
City :	Bethesda
State :	MD
Zip Code :	20814
Email Address :	debbie.michaels@att.net

Submission Content/Notes : Glenbrook Village Homeowners Association
Comments on the Purple Line DEIS

Glenbrook Village HOA, consists of 39 townhomes bordering the corner of Wisconsin Avenue and Jones Bridge Road.

Thank you for this opportunity to bring to your attention the Communities concerns, opinions and guidance in moving forward with realistic priorities for Transportation Growth in the State of Maryland.

While our Community is in full support of public transportation, reducing 'single occupancy vehicles' and incorporating pedestrian paths and bikeways along all roadways, we are opposed to Bus Rapid Transit along the Jones Bridge Road alignment. This route is being pushed by many groups without proper evaluation and insight into what this actually means. Woodmont Road and Wisconsin Avenue are in grid lock during peak travel times. The intersections of Jones Bridge Road and Wisconsin Avenue and Jones Bridge Road and Connecticut Avenue have been at a failing grade since for years. Once Jones Bridge Road crosses Connecticut Avenue it merges into one lane, is bound by a school and homes. It then takes a sharp turn onto Jones Mill Road and runs through Rock Creek Park. While there is much discussion about how many trees, will be lost with light rail on the trail – no comments on how many trees, homes, and public schools will be affected along the Jones Bridge Road Alignment and where that added cost would put the price of BRT. One has to look at the whole picture, not just attempt to make a case for not in my back yard, but okay in yours!

However, we do not believe that Bus Rapid Transit has been properly assessed in the DEIS. It has only looked at BRT on Jones Bridge Road and no other options. What about BRT along East West Highway, or BRT along the trail – we are not talking about smoking, noisy Ride-on-bus' as presently used in Montgomery County. But we encourage an in-depth study for cost, efficiency and speed of implementation. There are currently many options for environmentally friendly bus alternatives to choose from.

While light rail on the trail with a comprehensive pedestrian, bikeway alongside would be our first choice, our fear is that the investment will not be at a high enough level for an efficient, effective, environmental friendly system. In many major cities around the world these environmentally friendly light rail systems run within many Communities without the adverse effects being spoken about along the Trail. We encourage you to explore these alternatives and make sure we develop a state of the art transportation system that can grow with the on going need while sustaining the quality of life within our Community.

Debbie Michaels
President, Glenbrook Village HOA
8619 Terrace Garden Way, Bethesda, MD 20814
301-656-3610 – debbie.michaels@att.net

Attachments :

Glenbrook Village HOA.pdf (15 kb)

**Glenbrook Village Homeowners Association
Comments on the Purple Line DEIS**

Glenbrook Village HOA, consists of 39 townhomes bordering the corner of Wisconsin Avenue and Jones Bridge Road.

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Debbie Michaels
President, Glenbrook Village HOA
8619 Terrace Garden Way, Bethesda, MD 20814
301-656-3610 – debbie.michaels@att.net

- RECORD #1471 DETAIL

First Name :	Mier
Last Name :	Wolf
Business Name :	GBCCC
Address :	7622 Lynn Drive
City :	Chevy Chase
State :	MD
Zip Code :	20815
Email Address :	

Submission Content/Notes : My name is Mier Wolf. I live at 7622 Lynn Drive, Chevy Chase, Maryland. M-I-E-R is my first name, the last is W-O-L-F. I'm the former mayor of the town of Chevy Chase, Maryland, where I also served on the town council for 24 years.

I am currently chairman of the Greater Bethesda Chevy Chase Coalition. My testimony is as follows: A myth exists about the proposed Purple Line that it will meaningfully address the east to west transportation problems of Montgomery County. Oh, were it only so.

Actually, the project planners know that the, that there is as much as 1.6 billion dollars proposed Purple Line, 6 million if it's rapid bus transit, which will not remove a significant number of drivers from their cars and in the process destroy a magnificent linear park used by thousands of hiker/bikers in the Metropolitan area.

The Draft ENVIRONMENTAL IMPACT STATEMENT plans out for 30 years without acknowledging BRAC coming to the medical center or county residents of Metropolitan wide job holders needing transportation outside the beltway where county growth is occurring, not inside the beltway.

To make matters worse, the state has basically ignored the import of the Jones Bridge Road bus rapid transit alternative which would serve BRAC.

How did we reach this point of a long- term study with a flawed premise? In 1988, the county acquired the B & O right-of-way between D.C. and Littensville for 10 million dollars under the National Trails Systems Act.

No one talks about transit along the right-of-way between the D.C. and Bethesda. In 1996, the railroad tracks were removed from the right-of-way between Bethesda and Silver Spring. This was called the Greater Georgetown Branch portion of the line dedicated to the Capitol Crescent Trail in 1997.

Now, 500 thousand uses of the Capitol Crescent Trail occur each year. The trees have matured into a magnificent linear park which makes the trail experience exceptional for hiker/bikers.

The state and Purple Line supporters could not leave the wondrous hiking/biking success on the trail between Bethesda and Silver Spring alone, however. They justified their preoccupation with this portion of the Capitol Crescent Trail by claiming that the rails to trails legislation requires a mode of transportation next to any trail created. This is a double standard which is not included in the trail between Bethesda and the D.C. line.

Not that the state cares about the trail, it indicates in its Draft Environmental Impact Statement that any new trail created next to a light rail or rapid bus transit will have to be built by the county, so there either will be no new trail or just a narrow asphalt of raceway for bicycles, too dangerous for hikers to use. Hikers, bikers, constitute transportation currently.

The current trail use should be honored for what it is. Through the years, the state has spent millions of dollars of tax payer funds on it's pointless possibilities which would dramatically impact the use of the existing trail.

Years before the approval of BRAC, state delegate John Herson asked the MTA to include another route for the Purple Line in its deliberations.

The route is a Jones Bridge Road route, which would serve the medical center. Delegate Herson strongly advocated serving medical center with the NIH and Naval Hospital containing so many people commuting to jobs and visitors to those being treated in either of those facilities.

The Draft Environmental Impact Statement gives short trip to this route, apparently because BRAC came along late into their study and they had a preselected route and mode of transportation to support. In studying the Jones Bridge Road route, the state made the Silver Spring connection more complicated than the connection to the system if the Capitol Crescent Trail were used. The partiality for encumbering the trail was obvious.

So after many years of trying to fit a square peg into a round hole on the Capitol Crescent Trail, we have a Draft Environmental Impact Statement that obviously favors use of the trail for the Purple Line. The stakes are high with this proposal. If the ridership does not come to this project, we will have wasted more than a billion dollars of tax payer funds, an absorbent amount at any time but especially during a recession.

And what about the trees and trail experience? How come the state proposed to cut down hundreds of trees in a linear park to build a project like this? Just the nature of years of study and shifting a single track trolley to train to bus rapid transit shows that they are grasping for straws. But these are very expensive straws, both environmentally and financially that the state is grasping. Thank you.

Attachments :

Written Testimony. Mier Wolf.pdf (3 mb)

PURPLE LINE TESTIMONY

From Mier Wolf
7622 Lynn Drive
Chevy Chase, MD 20815

A myth exists about the proposed Purple Line that it will meaningfully address the east to west transportation problems of Montgomery County. Oh, were it only so. Actually, the project planners know that the as much as \$1.6 billion proposed Purple Line(\$600 million if it is Rapid Bus Transit) will not remove a significant number of drivers from their cars and in the process destroy a magnificent linear park used by thousands of hiker/bikers in the Metropolitan Area. The draft EIS plans out for 30 years without acknowledging BRAC coming to the Medical Center or county residents and Metropolitan wide job holders needing transportation outside the beltway where county growth is occurring, not inside the beltway. To make matters worse, the State has basically ignored the import of the Jones Bridge Road Bus Rapid Transit alternative which would serve BRAC.

How did we reach this point of a long term study with a flawed premise? In 1988 the county acquired the B&O right of way between DC and Lyttonsville for \$10 million under the National Trails Systems Act. No one talks about transit along the right of way between the DC and Bethesda. In 1996 the railroad tracks were removed from the right of way between Bethesda and Silver Spring.. This was the called the Greater Georgetown Branch portion of the line dedicated as an interim Capital Crescent Trail in 1997. In 1998 the tunnel under Wisconsin Avenue was opened to enable hiker/bikers to circumvent crossing Wisconsin Avenue at grade. The year 2003 saw a trestle east of Jones Bridge Road opened to provide hiker/bikers with a safe and atmospheric crossing. It includes a lay by for hiker/bikers to rest and enjoy the site which is blessed with trees and a creek below. Now 500,000 uses of the Capital Crescent Trail occur each year. The trees have matured into a magnificent linear park which makes the trail experience exceptional for hiker/bikers in the metropolitan area.

The State and Purple Line supporters could not leave the wondrous hiking/biking success on the trail between Bethesda and Silver Spring alone, however. They justify their preoccupation with this portion of the Capital Crescent Trail by claiming that the Rails to Trails legislation requires a mode of transportation next to any trail created. This is a double standard which does not include the trail between Bethesda and the DC line. Not that the State cares about the trail. It indicates in the draft EIS that any new trail created next to a light rail or Rapid Bus Transit will have to be built by the County! So there either will be no new trail, or just a narrow asphalted raceway for bicyclists—too dangerous for hikers to use. Hikers/bikers constitute transportation currently. The current trail use should be honored for what it is. Through the years the State has spent millions of dollars of taxpayer funds on exploring possibilities which would dramatically impact the use of the existing trail. In 1996 the State issued a study that envisioned a single track connection between Silver Spring and Bethesda. Then it appeared that the trolley might reduce traffic less than 5% on East-West Highway. It wasn't until 2001 when another proposal for east-west transportation mitigation became public. This time then County Executive Doug Duncan suggested there be an Outer Purple Line built to serve the growing work and residential communities outside the beltway. This system would have gone from Rock Spring Industrial Park, to Grosvenor, to Wheaton, on to White Oak, to Greenbelt and finally to New Carrollton. The Washington Post supported the Outer Line proposal in a November 11, 2001, editorial noting that, "any bang-for-the-bucks calculation must include the long-run relief that the outer

line offers. Growth won't be contained inside the Beltway, and more people will need to move around the region's core than through it." After the Outer Line failed, a subsequent Duncan proposal for a Purple Line Loop which would connect Silver Spring and Bethesda by the beltway including a stop at Medical Center was narrowly rejected by County Park and Planning.

But then Governor Glendenning determined that any Purple Line system should go through College Park and he revived the idea of a Purple Line between Bethesda and New Carrollton which would traverse the Capital Crescent Trail and eventually cut through the University of Maryland campus. This plan, which has been under study for years at a cost of \$30 million, at last count, raised the ire of those affected at either end of the line as well as in between. Though Governor Glendenning added the prospect of Bus Rapid Transit as an alternative mode of transportation, the focus of the draft environmental impact statement remained with a route down the Capital Crescent Trail.

Years before the approval of BRAC, state delegate John Hurson asked the MTA to include another route for the Purple Line in its deliberations. This route is the Jones Bridge Road route which would serve medical center. Delegate Hurson strongly advocated serving medical center with the NIH and Naval Hospital containing so many people commuting to jobs and visitors to those being treated in either of those facilities. The draft EIS gives short shrift to this route apparently because BRAC came along late into their study and they had a pre-selected route and mode of transportation to support. In studying the Jones Bridge Road route the State made the Silver Spring connection more complicated than the connection to the system if the Capital Crescent Trail were used. The partiality for encumbering the trail was obvious.

So after many years of trying to fit a square peg into a round hole on the Capital Crescent Trail, we have a draft EIS that obviously favors use of the trail for the Purple Line. The stakes are high with this proposal. If the ridership does not come to this project, we will have wasted more than \$1 billion of taxpayer funds—an exorbitant amount at any time but especially during a recession. And what about the trees and trail experience? How can the State propose to cut down hundreds of trees in a linear park to build a project like this? Just the nature of years of study and shifting from single track trolley, to train, to bus rapid transit shows that they are grasping for straws. But these are very expensive straws both environmentally and financially.

- RECORD #2173 DETAIL

First Name :	Mier
Last Name :	Wolf
Business Name :	GBCCC
Address :	7622 Lynn Drive
City :	Chevy Chase
State :	MD
Zip Code :	20815
Email Address :	
Submission Content/Notes :	
Attachments :	Comment Form. M. Wolf.pdf (931 kb)



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: MIKE WOLF Organization: GBCLC
Address: 7622 LYNN DR
City: CHEY CHASE State: MD Zip Code: 20815

I/We wish to submit the following comments on this project: _____

The Purple Line on the Capital Crescent Trail will destroy a linear park containing thousands of mature trees. This unconscionable environmental disaster would come as a result of inflated ridership statistics for a project that goes on the wrong alignment. Only Bus Rapid Transit on Jones Bridge Road will both SERVE BRTC and save the trees on the Capital Crescent Trail.

- RECORD #1348 DETAIL

First Name :	Dr. Jerry
Last Name :	Morenoff
Business Name :	Greater Bethesda/ Chevy Chase Chamber of Commerce
Address :	7910 Woodmont Avenue
City :	Bethesda
State :	MD
Zip Code :	20814
Email Address :	

Submission Content/Notes : Good evening. I'm Jerry Morenoff, J-E-R-R-Y, M-O-R-E-N-O-F-F, a long time resident of Bethesda. I am currently chairman of the Greater Bethesda Chevy Chase Chamber of Commerce, which represents more than 800 member businesses and there are more than 45,000 employees. I'm here to express our support of the Purple Line LRT mode and trail between downtown Bethesda and New Carrollton along the Georgetown Branch right-of-way.

This is the Chamber's number one priority. This is not a new position for us. The BCC Chamber has long supported the alignment for transit and trail on the Georgetown Branch right-of-way that has been in the BCC Master Plan, the Bethesda CBD sector plan and the Georgetown Branch Master Plan for over 20 years and purchased for such purpose.

Some of the main reasons why we urge the MTA to move forward on this option are, first, as the economic engine of Montgomery County, the Bethesda CBD is projected to experience an increase to over 41 thousand jobs by 2030. As residents and jobs move to Bethesda, employees, residents and visitors will need better transit options in order to access the adjacent major activity centers to the east. Implementation of the Purple Line will create this missing east-west transit link.

Second, economic and business development will be directly benefitted by this route. The Purple Line will improve the quality, value and character of some of our neighborhood centers and reduce travel times for our residents and employees using public transit. The convenience of being near an attractive, safe, environmental friendly LRT line on nearby streets will enhance property values and business opportunities as well as the quality of life for both residents and commuters.

Third, time is a valuable resource for residents, students, employers, and employees. The LRT Purple Line alignment provides the fastest travel times for existing transit users and encourages new riders to utilize transit. The time benefits are felt beyond the important Bethesda/Silver Spring connection. The Purple Line provides faster, more efficient and environmentally superior connections to the Langley Park/Tacoma transit center and to Metro stations and communities to the east including the University of Maryland and Metro's orange line.

Fourth, the BRT route along Jones Bridge Road by Naval Medical will exacerbate the current congested intersections along this route as well as along Woodmont Avenue straight through downtown Bethesda. Navy Medical's growth from BRAC will cause more traffic...to take public transportation. Adding a bus way in the middle of thousands of cars makes absolutely no sense.

Finally, Bethesda Chevy Chase is the economic engine of the county. However, the missing link for economic efficiency has always been the east-west transit between population centers of Montgomery and Prince George's county. We need this link to be completed now and we urge the MTA to move forward on the Purple Line LRT mode and trail between downtown Bethesda and New Carrollton along the Georgetown Branch right-of-way. Thank you.

- RECORD #2217 DETAIL

First Name :	Dr. Jerry
Last Name :	Morenoff
Business Name :	The Greater Bethesda-Chevy Chase Chamber of Commerce
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	
Attachments :	Wrttn Tstmny. Dr. Jerry Morenoff.pdf (4 mb)



The Greater Bethesda-Chevy Chase Chamber of Commerce

7910 Woodmont Avenue, Suite 1204, Bethesda MD, 20814 • Ph (301) 652-4900 • Fax (301) 657-1973 • Email staff@bccchamber.org • Web www.bccchamber.org

Your Business Is
Our Only Business

**Testimony of Dr. Jerry Morenoff
On Behalf of
The Greater Bethesda-Chevy Chase
Chamber of Commerce
at the
Maryland Transit Administration's
Public Hearing on the
Purple Line AA/DEIS
November 18, 2008**

National 4 H Conference Center, Chevy Chase, MD

**THE GREATER BETHESDA-CHEVY CHASE CHAMBER OF COMMERCE
TESTIMONY REGARDING THE PURPLE LINE AA/DEIS
NOVEMBER 18, 2008**

GOOD EVENING. FOR THE RECORD, MY NAME IS DR. JERRY MORENOFF. I LIVE AT 9712 BARRISTER COURT IN BETHESDA, MARYLAND, 20814. I SPEAK BEFORE YOU AS THE CHAIRMAN OF THE GREATER BETHESDA-CHEVY CHASE CHAMBER OF COMMERCE, WHICH REPRESENTS MORE THAN 800 MEMBER BUSINESSES AND THEIR MORE THAN 45,000 EMPLOYEES.

ON BEHALF OF THE CHAMBER, I AM HERE TO EXPRESS OUR SUPPORT OF THE PURPLE LINE LRT MODE AND TRAIL BETWEEN DOWNTOWN BETHESDA AND NEW CARROLLTON, ALONG THE GEORGETOWN BRANCH RIGHT-OF-WAY. THIS IS NOT NEW POSITION FOR US.

THE B-CC CHAMBER HAS LONG SUPPORTED THE ALIGNMENT FOR TRANSIT/TRAIL ON THE GEORGETOWN BRANCH RIGHT-OF-WAY THAT HAS BEEN IN THE B-CC MASTER PLAN, BETHESDA CBD SECTOR PLAN AND THE GEORGETOWN BRANCH MASTER PLAN FOR OVER 20 YEARS, AND PURCHASED FOR SUCH PURPOSE.

FOLLOWING ARE SOME OF THE PRIMARY REASONS WHY WE URGE THE MARYLAND TRANSIT ADMINISTRATION TO MOVE FORWARD ON THIS OPTION:

FIRST: AS THE **ECONOMIC ENGINE** OF MONTGOMERY COUNTY, THE BETHESDA CENTRAL BUSINESS DISTRICT IS PROJECTED TO EXPERIENCE AN INCREASE TO 41,550 JOBS BY 2030. AS RESIDENTS AND JOBS MOVE TO BETHESDA, EMPLOYEES, RESIDENTS, AND VISITORS WILL NEED BETTER TRANSIT OPTIONS IN ORDER TO ACCESS THE ADJACENT MAJOR ACTIVITY CENTERS TO THE EAST. IMPLEMENTATION OF THE PURPLE LINE WILL CREATE THIS MISSING EAST-WEST TRANSIT LINK.

SECOND: **ECONOMIC AND BUSINESS DEVELOPMENT** WILL BE DIRECTLY BENEFITED BY THIS ROUTE. THE PURPLE LINE WILL IMPROVE THE QUALITY, VALUE, AND CHARACTER OF SOME OF OUR NEIGHBORHOOD CENTERS, AND IT WILL IMPROVE THE EXPERIENCE AND REDUCE TRAVEL TIMES FOR OUR RESIDENTS AND EMPLOYEES USING PUBLIC TRANSIT. THE CONVENIENCE OF BEING NEAR AN ATTRACTIVE, SAFE, ENVIRONMENTALLY FRIENDLY LRT LINE ON NEARBY STREETS WILL ENHANCE PROPERTY VALUES AND BUSINESS OPPORTUNITIES, AS WELL AS THE QUALITY OF LIFE FOR BOTH RESIDENTS AND COMMUTERS.

THIRD: **TIME** IS A VALUABLE RESOURCE FOR RESIDENTS, STUDENTS, EMPLOYERS AND EMPLOYEES. THE PURPLE LINE ALIGNMENT AS LRT PROVIDES THE FASTEST TRAVEL TIMES FOR EXISTING TRANSIT USERS AND ENCOURAGES NEW RIDERS TO UTILIZE TRANSIT. THE TIME BENEFITS ARE FELT BEYOND THE IMPORTANT BETHESDA / SILVER SPRING CONNECTION.

THE PURPLE LINE PROVIDES FASTER, MORE EFFICIENT, AND ENVIRONMENTALLY SUPERIOR CONNECTIONS TO THE LANGLEY PARK/TAKOMA TRANSIT CENTER AND TO METRO STATIONS AND COMMUNITIES TO THE EAST INCLUDING THE UNIVERSITY OF MARYLAND AND THE ORANGE LINE OF THE METRO.

FOURTH: THE BRT ROUTE ALONG JONES BRIDGE ROAD BY NAVY MEDICAL WILL ONLY EXACERBATE THE CURRENT CONGESTED INTERSECTIONS ALONG THIS ROUTE, AS WELL AS WOODMONT AVENUE STRAIGHT THROUGH OUR DOWNTOWN. NAVY MEDICAL'S GROWTH FROM BRAC WILL CAUSE MORE TRAFFIC CONGESTION BECAUSE OF THE THOUSANDS OF VISITORS AND DAY PATIENTS WHO ARE TOO ILL OR OVERWHELMED TO TAKE PUBLIC TRANSPORTATION. ADDING A BUSWAY IN THE MIDDLE OF THOUSANDS OF CARS MAKES NO SENSE.

FINALLY: I MENTIONED EARLIER THAT BETHESDA-CHEVY CHASE IS THE ECONOMIC ENGINE OF THE COUNTY, HOWEVER THE MISSING LINK FOR ECONOMIC EFFICIENCY HAS ALWAYS BEEN THE EAST-WEST TRANSIT BETWEEN THE POPULATION CENTERS OF MONTGOMERY COUNTY AND PRINCE GEORGE'S COUNTY.

WE NEED THIS LINK TO BE COMPLETED NOW AND WE URGE THE MARYLAND TRANSIT ADMINISTRATION TO MOVE FORWARD ON THE PURPLE LINE LRT MODE AND TRAIL BETWEEN DOWNTOWN BETHESDA AND NEW CARROLLTON, ALONG THE GEORGETOWN BRANCH RIGHT-OF-WAY.

THANK YOU FOR YOUR CONSIDERATION.

- RECORD #1244 DETAIL

First Name :	James
Last Name :	Walker
Business Name :	Greater Silver Spring Chamber of Commerce
Address :	8601 Georgia Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Good afternoon, my name is James Walker. J-A-M-E-S, W-A-L-K- E-R. I'm here today to testify on behalf of the Greater Silver Spring Chamber of Commerce. I'm a member of the Chamber's Executive Committee and it's Immediate Past Chair.

The Chamber represents 400 member businesses and almost 15,000 employees in Greater Silver Spring. I'm here to express our strong support for building a purple line between Bethesda and New Carrollton.

The Chamber has long believed that the vital east/west connection will reduce automobile traffic, improve access to employment centers along the route, and most important, further commercial revitalization in Greater Silver Spring.

Specifically we support a light rail transit mode that follows the Georgetown Branch right-of-way entering Silver Spring on the CSX right-of-way and proceeding directly into the new transit center.

The redevelopment of Silver Spring has created a renaissance in our community that is nothing short of amazing. But as the Chamber has often said, we're not finished yet. The addition of an efficient and convenient east/west transit link will do much to support continued economic growth and development.

Indeed we believe building an attractive, safe and environmentally friendly light rail system along this corridor will encourage economic and business development and improve the quality and character of our neighborhoods and access to our communities by commuters.

Neighborhoods along the purple line will be revitalized as people seek housing that is close to purple line stops. It will also bring new energy to the currently underserved Long Branch and Takoma Langley crossroads areas.

We believe that the time has come to move forward on this project. The DEIS notes that if the purple line is not built, bus service and automobile movement along the existing transit corridor is projected to deteriorate significantly as congestion increases in the coming years.

Our business owners, their employees and the communities along the route stand to lose if nothing is done to alleviate this undesirable scenario.

Building the purple line now will provide the necessary relief by offering a convenient way to avoid congestion for people who work, shop, dine or play along the corridor that spans two counties.

By taking up to 20,000 cars off the road, the purple line will mitigate traffic congestion and at the same time move larger numbers of people into and out of Silver Spring, and that's good for businesses and residents.

I would also like to note that the Chamber strongly believes that light rail is the most appropriate choice. In order for the transit alternative to be maximally utilized, it must be reliable and efficient and it must offer significant savings and travel times versus commuting by car.

Light rail offers a quiet, smooth and more efficient alternative that is more compatible with what we believe most commuters are seeking. And, as outlined in the DEIS, the light rail options significantly outperform the bus route's rapid transit options in both reliability and efficiency.

As we have said, the Greater Silver Spring Chamber believes that the time to move forward to build the purple line is now. The critical east/west link between Bethesda and New Carrollton will assure the future economic vitality of the entire corridor. Thank you.

- RECORD #1261 DETAIL

First Name : Sam
Last Name : Black
Business Name : Greater Washington Board of Trade
Address : 1201 Pennsylvania Avenue, NW
City : Washington
State : DC
Zip Code : 20004
Email Address :

Submission Content/Notes : My name is Sam Black, S- A-M, B-L-A-C-K. I represent the Greater Washington Board of Trade and I also serve as the President of the Washington Smart Growth Alliance which supports transit-oriented development.

We have written testimony which we ask be included in the record.

Mr. Chairman, I am here for the largest business group in the region, the Greater Washington Board of Trade. We strongly support the rail purple line.

We support building the best rail line we can. Mr. Chairman, the Board of Trade believes that clean air is good for business, curbing sprawl is good for business, cutting greenhouse gas emissions is good for business, investing in our communities is good for business, and a rail purple line will serve all these goals not just for business but for all citizens.

I wish we were breaking ground on the purple line today. Thank you very much.

- RECORD #510 DETAIL

First Name :	James C.
Last Name :	Dinegar, CAE
Business Name :	Greater Washington Board of Trade
Address :	1725 I Street, NW
City :	Washington
State :	DC
Zip Code :	20006
Email Address :	

Submission Content/Notes : Mr. Michael Madden
Project Manager
Maryland Transit Administration
6 St. Paul St.
Baltimore, MD 21202

Dear Mr. Madden:

The Purple Line is one of the Greater Washington Board of Trade's transportation priorities and we fully support its expedited construction as a light rail project. We are mindful of the existing budget challenges facing Maryland and appreciate the current state commitment of \$92 million to compete for federal New Starts funding by providing for Alternatives Analysis, the Draft Environmental Impact Statement and Preliminary Engineering/Final Environment Impact Statement. We support an additional funding commitment for construction of the Purple Line with the caveat that existing commitments to secure \$3 billion in dedicated matching funding for Metro and existing and future funding for the Inter County Connector are held harmless.

Just as the planned extension of Metrorail to Tysons and Dulles is a regional project, so too is construction of the Purple Line as it will link key activity centers between Montgomery and Prince George's Counties and provide new and better access inside the Beltway. It will serve as another important piece of the much needed transit improvements our region requires to provide more transportation choices for our commuters, residents, and visitors.

Construction of the light rail option will provide the tangible commitment to permanency and sense of community needed to stimulate transit oriented development (TOD) along the Bethesda to New Carrollton corridor. Linking Bethesda, Silver Spring, College Park and New Carrollton will provide new access to Metro's Red, Green, and Orange lines as well as the Maryland Commuter Rail service, local bus service, and Amtrak. These links, will provide for more effective use of Metro, will link local and regional business and housing options, and will provide better connections between employees and employers in suburban Maryland, the District of Columbia, and Northern Virginia.

The Purple Line will also put in place and support a mode of transportation and the future land use patterns called for by the recent climate change commission reports of the State of Maryland and the Metropolitan Washington Council of Governments. Additional transit capacity and new transit oriented development will help reduce vehicle miles traveled (VMT)-one of the key measures called for by government reports to help reduce our region's greenhouse gas emissions.

Thank you for your leadership on this important project and for this opportunity to comment.

Sincerely,

(Signature on file)

James C. Dinegar, CAE
President and CEO

cc: William Couper
John Kane

Attachments : Greater Washington Board of Trade Letter, scanned.pdf (62 kb)



GREATER WASHINGTON

Board of Trade

Growing Business. Building Community.

October 27, 2008

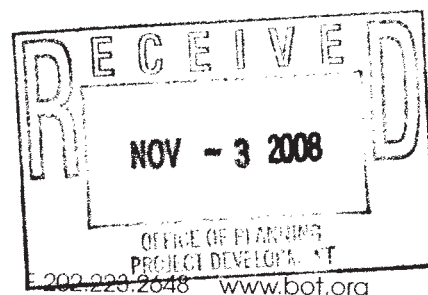
Mr. Michael Madden
Project Manager
Maryland Transit Administration
6 St. Paul St.
Baltimore, MD 21202

Dear Mr. Madden:

The Purple Line is one of the Greater Washington Board of Trade's transportation priorities and we fully support its expedited construction as a light rail project. We are mindful of the existing budget challenges facing Maryland and appreciate the current state commitment of \$92 million to compete for federal New Starts funding by providing for Alternatives Analysis, the Draft Environmental Impact Statement and Preliminary Engineering / Final Environment Impact Statement. We support an additional funding commitment for construction of the Purple Line with the caveat that existing commitments to secure \$3 billion in dedicated matching funding for Metro and existing and future funding for the Inter County Connector are held harmless.

Just as the planned extension of Metrorail to Tysons and Dulles is a regional project, so too is construction of the Purple Line as it will link key activity centers between Montgomery and Prince George's Counties and provide new and better access inside the Beltway. It will serve as another important piece of the much needed transit improvements our region requires to provide more transportation choices for our commuters, residents, and visitors.

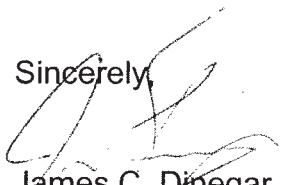
Construction of the light rail option will provide the tangible commitment to permanency and sense of community needed to stimulate transit oriented development (TOD) along the Bethesda to New Carrollton corridor. Linking Bethesda, Silver Spring, College Park and New Carrollton will provide new access to Metro's Red, Green, and Orange lines as well as the Maryland Commuter Rail service, local bus service, and Amtrak. These links, will provide for more effective use of Metro, will link local and regional businesses and housing options, and will provide better connections between employees and employers in suburban Maryland, the District of Columbia, and Northern Virginia.



The Purple Line will also put in place and support a mode of transportation and the future land use patterns called for by the recent climate change commission reports of the State of Maryland and the Metropolitan Washington Council of Governments. Additional transit capacity and new transit oriented development will help reduce vehicle miles traveled (VMT) – one of the key measures called for by government reports to help reduce our region's greenhouse gas emissions.

Thank you for your leadership on this important project and for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'James C. Dinegar', written over the word 'Sincerely,'.

James C. Dinegar, CAE
President and CEO

cc: William Couper
John Kane

- RECORD #1455 DETAIL

First Name :	Daniel
Last Name :	Flores
Business Name :	Greater Washington Board of Trade
Address :	1725 I St. NW
City :	Washington
State :	DC
Zip Code :	20006
Email Address :	

Submission Content/Notes : Good evening. My name is Daniel Flores. That's spelled D-A-N-I-E-L, last name F-L-O-R-E-S. And I am vice-president and regional government relations for the Greater Washington Board of Trade at 1725 I Street N.W. in Washington, D.C.

The Board of Trade was founded in 1889 and is the largest regional network of business and non-profit leaders and greater Washington region. We serve the geographic area of suburban Maryland, the District of Columbia and northern Virginia.

The Purple Line is one of the Board of Trade's key transportation priorities and we fully support its expedited construction as a light rail project. We're mindful of the existing budget challenges facing Maryland and appreciate the current state's funding commitment of 92 million to complete, to compete for federal use and funding by provided for alternative analysis the Draft Environmental Impact Statement and preliminary engineering final environment impact statement. We support an additional funding commitment for construction of the Purple Line with the existing state matching funds to secure three billion dollars in dedicated funding for Metro and existing and future funding for their inner county connector are held harmless.

Just as the planned extension of Metro rail to Tyson's and Dulles International Airport is a regional project so to is construction of the Purple Line as it will link key activity centers between Montgomery and Prince George's counties and provide for new and better access inside the beltway.

This improvement will link local and regional businesses and housing, shopping and recreation options and will provide better connections between employees and employers with suburban Maryland and within, in-between Maryland, District of Columbia and northern Virginia. Linking Bethesda, Silver Spring, College Park and New Carrollton will provide new access to Metros, red, green and orange lines as well as the Maryland's commuter rail service, local bus service and Amtrak.

This will provide for a better use of our Metro system and it will foster a more balanced flow of travelers from the downtown core areas to jobs in transit oriented development centers located in Montgomery and Prince George's.

The Purple Line will serve as another important piece of the much needed transit improvements our region requires to provide more transportation choices for our commuters, residents and visitors.

Construction of the light rail option will provide the tangible commitment to permanency and sense of community needed to stimulate transit oriented development along the Bethesda to New Carrollton corridor. New transit oriented development will stimulate community revitalization and will assist in the achievement of local community development goals.

The Purple Line will improve our air quality and put in place and support a mode of transportation and future land use patterns all for by their recent climate change commission report of the state of Maryland and the Metropolitan Washington Council of Governments.

Finally, additional transit capacity and new transit-oriented development will help reduce vehicle miles traveled or VMT, one of the key measures called for by government reports to help reduce our region's greenhouse gas omissions. Again, we urge the expedited building and funding of a

light rail affirmative for the Purple Line so that the above noted benefits can be realized and our region improved.

Thank you for your leadership on this important project and for this opportunity to comment.

Attachments :

Written Statement. Daniel Flores.pdf (2 mb)

Statement of Daniel Flores
Greater Washington Board of Trade
Regarding Purple Line Alternatives Analysis / Draft EIS
November 18, 2008

Good evening, my name is Daniel Flores and I am Vice President of Regional Government Relations for the Greater Washington Board of Trade.

The Board of Trade was founded in 1889 and is the largest regional network of business and non-profit leaders and the only group representing all industry sectors in the Greater Washington region. We serve the geographic area of suburban Maryland, the District of Columbia, and Northern Virginia.

The Purple Line is one of the Board of Trade's key transportation priorities and we fully support its expedited construction as a light rail project.

We are mindful of the existing budget challenges facing Maryland and appreciate the current state's funding commitment of \$92 million to compete for federal New Starts funding by providing for Alternatives Analysis, the Draft Environmental Impact Statement and Preliminary Engineering / Final Environment Impact Statement.

We support an additional funding commitment for construction of the Purple Line with the caveat that existing state matching funds to secure \$3 billion in dedicated funding for Metro and existing and future funding for the Inter County Connector are held harmless.

Just as the planned extension of Metrorail to Tysons and Dulles International Airport is a regional project, so too is construction of the Purple Line as it will link key activity centers between Montgomery and Prince George's Counties and provide for new and better access inside the Beltway.

This improvement will link local and regional businesses and housing, shopping, and recreational options, and will provide better connections between employees and employers within suburban Maryland and within and between Maryland, the District of Columbia, and Northern Virginia.

Linking Bethesda, Silver Spring, College Park and New Carrollton will provide new access to Metro's Red, Green, and Orange lines as well as the Maryland Commuter Rail service, local bus service, and Amtrak. This will provide for better use of our Metro system as it will foster a more balanced flow of travelers from the downtown core area to jobs in the transit-oriented development centers located in Montgomery and Prince Georges.

The Purple Line will serve as another important piece of the much needed transit improvements our region requires to provide more transportation choices for our commuters, residents, and visitors.

Construction of the light rail option will provide the tangible commitment to permanency and sense of community needed to stimulate transit-oriented development along the Bethesda to New Carrollton corridor. New transit oriented development will stimulate community revitalization and will assist in the achievement of local community development goals.

The Purple Line will improve our air quality and put in place and support a mode of transportation and future land use patterns called for by the recent climate change commission reports of the State of Maryland and the Metropolitan Washington Council of Governments.

Finally, additional transit capacity and new transit-oriented development will help reduce vehicle miles traveled (VMT) – one of the key measures called for by government reports to help reduce our region's greenhouse gas emissions.

Again, we urge the expedited review, approval, and funding of a light rail alternative for the Purple Line so that the above noted benefits can be realized and our region improved.

Thank you for your leadership on this important project and for this opportunity to comment.

- RECORD #2906 DETAIL

First Name :	Artis J.
Last Name :	Johnson
Business Name :	President, Hanson Oaks Association
Address :	4084 Hanson Oaks Drive
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State :	MD
Zip Code :	20784
Email Address :	MARYJ.NINETYTHREE@VERIZON.NET

To Whom It May Concern:

I have purposely waited for the last minute to submit my comments/thoughts regarding the routing of the Purple Line down Veterans Parkway (Route 410) to Ellin Road with the final destination being New Carrollton. I have done this because I have been too upset and disgusted to respond earlier. Never in my wildest nightmare could I have imagined that you would consciously destroy a residential community while not taking advantage of an already existing business corridor to run the Purple Line. While Ellin Road could have been a possibility, it should be apparent to everyone in the decision making process that it is not viable!!!!!!!

First and foremost, please allow me to provide some vital information about the Hanson Oaks and Old Ardwick-Ardmore community. We are bound on one side of Route 50 with the Amtrak/metro rail tracks and if the rail tracks are laid on Ellin Road, we would be totally land locked since this area is a dead end. The only entrance and exit are through Ellin Road. In the event of a major emergency, there is no way that neither the police, fire department nor medical personnel/ambulance could enter the community. In other words, we would become prisoners within our own community.

This community consists of both senior citizens who walk daily to the metro as well as many infants and children. There are school buses who pick up children at the corner of Ellin Road and Hanson Oaks Drive and there are also school buses that enter the complex to pick up the younger children. All during the day there are buses in and out of this community.

As told to us at one of the meetings in which some representatives from the MTA were in attendance, during rush hour the bus would run approximately every six minutes. Can you imagine the back-up this is going to create not only on Ellin Road but also on Hanson Oaks Drive?

In addition to the disruption within our daily lives, the Purple Line on Ellin Road would:

Attract more unwelcomed visitors to the community who otherwise would not be here.
Attract more unwelcomed cars parked in our parking lots, Hanson Oaks Drive and Old Ardwick-Ardmore Road.

Create more noise and create an eye score for those of us who would be looking directly at the rails.
Create more vibrations thus causing more structural damage to our homes. (I had cracks in every room as a result of the construction that took place on Ellin Road.)
Create safety hazards for those residents walking to the metro.
Cause residents to take unnecessary chances trying to enter Ellin Road once the grade crossing arm/signals are put into place.
Disrupt the water flow of the underground streams that surround our community thus making us more vulnerable to standing water not only in our homes but additional standing water in our parking lot.

I invite all of you to come visit our community and not just Google it to get an aerial view of what it looks like. Get up from your desks and not only talk and read our concerns but also let your conscious be your guide. Ask yourselves if you would want this in your front yard??????

Thank you.

Artis Johnson

Homeowner

President, Hanson Oaks Association

Extremely Concerned Citizen

- RECORD #1226 DETAIL

First Name : Walter
Last Name : Gottlieb
Business Name : Indian Spring Citizen Assoc
Address : 203 Brewster Avenue
City : Silver Spring
State : MD
Zip Code : 20910
Email Address :

Submission Content/Notes : I'm Walter Gottlieb, G-O-T-T-L-I-E-B. I'm President of the Indian Springs Citizen's Association.

The Indian Springs Citizens Association consists of 800 homes and we live right next to the beltway off of Colesville Road.

This testimony is to inform you of our association's views on the purple line.

Last spring, our association took a vote on the purple line. The vote was 70 in favor and 3 opposed to the following resolution which states: ISCA supports the building of the purple line from New Carrollton to Bethesda. We prefer the light rail option over the bus rapid transit option as it provides better travel times and wider projections.

We favor the purple line as it is the first major step towards developing transit solutions to our transportation needs in preference to highway solutions, and we continue to oppose beltway widening. Thank you.

- RECORD #2291 DETAIL

First Name :	Tony
Last Name :	Hausner
Business Name :	Indian Spring Citizen Assoc
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	
Attachments :	Hausner_Tony.pdf (225 kb)

TESTIMONY OF TONY HAUSNER AND WALTER GOTTLIEB,
INDIAN SPRING CITIZENS ASSOCIATION
MTA HEARING, NOVEMBER 22, 2008

I am Tony Hausner, a board member of the Indian Spring Citizens Association and a member of a Bicounty Task Force established by the two County Executives, and a member of the Planning Board's Purple Line Master Plan Advisory Group.

I am Walter Gottlieb, President of the Indians Spring Citizens Association. The Indian Spring Citizens Association consists of 800 homes and we live right next to the beltway off of Colesville road. This testimony is to inform you of our Association's views on the purple line.

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I would like to briefly compare Light Rail (LRT) vs Bus Rapid Transit (BRT)
I will focus on the medium investment LRT and BRT as these are the best options for these two alternatives.

Light rail (LRT) is significantly better than bus rapid transit (BRT) on:

- Travel times
- Ridership
- Converting automobile drivers to transit riders
- Pollution
- Noise levels
- Economic development
- Property values
- Jobs for low income populations

BRT has significant limitations in capacity which will be exceeded shortly after 2030.

While LRT costs more, these advantages more than pay for themselves over time.

I will now give a more detailed statement on these points. Many of the statements in this overview are based on estimates for the year 2030 in the DEIS. Beyond 2030, the advantages for LRT increase.

1. LRT takes significantly less time to travel between stations, e.g., from Bethesda to Silver Spring 9 minutes vs. 19 minutes.

2. LRT has significantly more riders than BRT, 62,600 vs. 51,800
3. LRT results in significantly more auto drivers switching to transit than BRT, 19,200 vs. 15,300.
4. With higher gas prices, Purple Line ridership will be even higher, which argues even more for a rail solution. BRT has limited capacity and will have difficulty in handling significant future increases in ridership. This is a critical limitation.
5. Using typical growth rates for transportation systems, the advantages of LRT over BRT become even greater after 2030.
6. Total capital costs for LRT are \$1.22 billion which are significantly more than BRT at \$580 million. However, the advantages of LRT significantly outweigh the costs.
7. BRT is more cost-effective than LRT, but both are significantly under the FTA threshold which is the key criteria. Beyond 2030, both are likely to become more cost-efficient, with LRT becoming more efficient at a faster rate. Further, we believe that the estimates for BRT may be too low.
8. LRT will reduce air pollution significantly more than BRT because it emits less air pollution and it removes more air polluting cars
9. LRT outperforms BRT on noise levels
10. LRT takes more trees than BRT along the Capital Crescent Trail. MTA is required to replace those trees at the nearest suitable location.
11. The Purple Line will improve transportation along the route it serves. It will also better connect people living along this route with key economic resources elsewhere in the region. In addition, it will vastly increase the radius within which people can live and still get to work reliably along the route within what is widely viewed as a reasonable 45 minute commuting time, which is especially important to low-income populations. What this will do is enhance the competitiveness and attractiveness of our communities as locations for businesses.
12. LRT is the model that is preferred over BRT throughout the US and internationally because of the advantages discussed above as evidenced in China.
13. A Purple Line built as a LRT will contribute greatly to the communities it serves by bolstering economic development, increasing property values, and encouraging re-development of underutilized areas, particularly around the planned station areas. Our assessable tax base will be increased, adding many millions of dollars in future tax revenue to the County (and state), for years to come and without raising tax rates.

14. The purple line can serve as a national model. Right now the metro system involves travel from suburbs to central city. There are no direct connections between suburbs. When the purple line eventually becomes a complete circle, it will connect all major inner suburbs with each other.
15. The vision of the Purple Line is that it will be a high enough quality to be part of the Metrorail system and displayed on maps. A light rail line has a better chance of accomplishing that.
16. The business community, Prince George's Elected Officials, and other Purple Line advocates strongly support light rail for the Purple Line. There is a major risk that they will drop their support for the Purple Line if the county chooses BRT.

- RECORD #2719 DETAIL

First Name :	Tony
Last Name :	Hausner
Business Name :	Indian Spring Citizen Assoc
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : BRIEF STATEMENT BY TONY HAUSNER
INDIAN SPRING CITIZENS ASSOCIATION
PLANNING BOARD HEARING, JANUARY 8, 2009

I am Tony Hausner, with Indian Spring Citizens Association (ISCA), and two countywide task forces. (Purple Line Bicounty Task Force, and Planning Board's Purple Line Master Plan Advisory Group). ISCA has 800 homes just inside the Beltway.

We voted this year, 70 to 3 to support the purple line and prefer light rail over bus rapid transit. We support transit solutions rather than highway solutions and we oppose Beltway widening as it will be destructive to our neighborhood and to suburban Maryland. (see flyer on Beltway Widening, <http://www.nobeltwayexpansion.com/beltway/cabeflyer.pdf>)

I will briefly compare medium Light Rail Transit vs Bus Rapid Transit

Light rail is significantly better on:

- ? Travel times
- ? Ridership
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- ? Pollution
- ? Noise levels
- ? Economic development
- ? Property values
- ? Jobs for low income populations

Beyond 2030, bus capacity will be exceeded.

Using typical growth rates for transportation systems, the advantages of LRT over BRT become even greater after 2030.
Some details:

1. LRT has more riders 62,000 vs. 52,000
2. LRT converts more car drivers to transit 19,000 vs. 15,000. This is critical to air pollution.
3. We support the position taken by the local chapter of the Sierra Club that in the future LRT vehicles will also emit less air pollutants than BRT vehicles.

While we support the Purple Line, there are several other important planning considerations.

? Affordable housing needs to be maintained as best as possible at current levels at all locations along the route

? We do not want to see overdevelopment, particularly in residential neighborhoods. The goal of the purple line from our view is provide transportation and transit oriented development, but not to be an excuse to overdevelop the area.

The business community, Prince George's Elected Officials, and other Purple Line advocates strongly support light rail for the Purple Line.

There is a major risk that they will drop their support for the Purple Line if the county chooses BRT.

Our full written statement provides further thoughts and information on these alternatives.

We strongly recommend that you support a light rail system for the Purple Line.

.

WRITTEN STATEMENT OF TONY HAUSNER
INDIAN SPRING CITIZENS ASSOCIATION
PLANNING BOARD HEARING, JANUARY 8, 2009

I am Tony Hausner, a board member of the Indian Spring Citizens Association and a member of a Bicoounty Task Force established by the two County Executives, and a member of the Planning Board's Purple Line Master Plan Advisory Group.

First, I want to compliment the Planning Board staff for their excellent report with which they provided you.

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BRT has significant limitations in capacity which will be exceeded shortly after 2030.

While LRT costs more, these advantages more than pay for themselves over time.

LRT makes a number of important contributions to reductions in air pollution. It significantly converts more riders to transit. Further, we support the position taken by the local chapter of the Sierra Club that in the future LRT vehicles will also emit less air pollutants than BRT vehicles.

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 8. LRT will reduce air pollution significantly more than BRT because in the future it will emit less air pollution and it removes more air polluting cars. I call to your attention the statement by the local chapter of the Sierra Club in which they support that LRT will emit less air pollution in the future.
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- We strongly recommend that you support a light rail system for the Purple Line.

BRIEF STATEMENT BY TONY HAUSNER
INDIAN SPRING CITIZENS ASSOCIATION
PLANNING BOARD HEARING, JANUARY 8, 2009

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We strongly recommend that you support a light rail system for the Purple Line.

- RECORD #381 DETAIL

First Name : Tony

Last Name : Hausner

Business Name :

Address :

City : Silver Spring

State : MD

Zip Code :

Email Address : THAUSNER@GMAIL.COM

Submission Content/Notes : Attached is the testimony that I presented to the MTA hearing on Novemember 22 hearing in Silver Spring, plus a statement made at a press conference organized by Purple Line Now (purplelinenow.com)

--

Tony Hausner
Silver Spring, MD
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cell: 301-641-0497

Attachments : ss testimony3.pdf (20 kb)

PRESS STATEMENT BY TONY HAUSNER
INDIAN SPRING CITIZENS ASSOCIATION
MTA HEARING, NOVEMBER 22,2008

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- Economic development
- Property values
- Jobs for low income populations

Beyond 2030, bus capacity will be exceeded and light rail's advantages will increase over time.

Some details:

1. LRT has more riders 62,000 vs. 52,000
2. LRT converts more car drivers to transit 19,000 vs. 15,000. This is critical to air pollution.
3. LRT vehicles also emit less air pollutants
4. Most of the groups that support the purple line want light rail and will not support buses.

TESTIMONY OF TONY HAUSNER AND WALTER GOTTLIEB,
INDIAN SPRING CITIZENS ASSOCIATION
MTA HEARING, NOVEMBER 22, 2008

I am Tony Hausner, a board member of the Indian Spring Citizens Association and a member of a Bicounty Task Force established by the two County Executives, and a member of the Planning Board's Purple Line Master Plan Advisory Group.

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- RECORD #2941 DETAIL

First Name : Mike
Last Name : Schapiro
Business Name : Jews United for Justice
Address : 537 Thayer Ave., Apt 302
City : Silver Spring
State : MD
Zip Code : 20910
Email Address :
Submission Content/Notes :
Attachments : Schapiro_Mike.pdf (102 kb)



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: MIKE SCHAPIRO Organization: Jews United for Justice

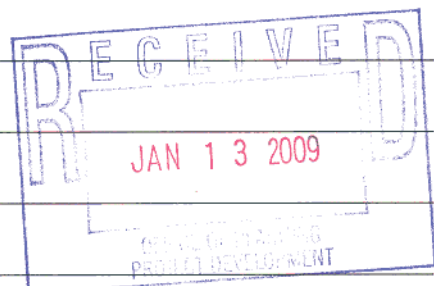
Address: 537 Thayer Ave. Apt. 302

City: Silver Spring State: MD Zip Code: 20910

I/We wish to submit the following comments on this project: I Support the

Construction of the Purple Line. Every time I
travel to Bethesda I either drive, take a
bus, or take a metro train. Having the option to
take the Purple Line would save me money, gas,
and improve the problem of gas emissions.

I feel, also, that attention should be paid to
the lower-income communities along the Purple Line's
path. Protections should be created for families &
local businesses to prevent large-scale displacement.



- RECORD #2940 DETAIL

First Name :	Sarah
Last Name :	Meyers
Business Name :	Jews United for Justice
Address :	8605 Postock Road
City :	Potomac
State :	MD
Zip Code :	20854
Email Address :	
Submission Content/Notes :	
Attachments :	Meyers_Sarah.pdf (86 kb)



Purple Line AA/DEIS Comment Form

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PLEASE PRINT

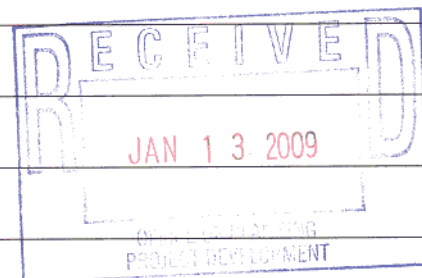
Name: Sarah Meyers Organization: Jews United for Justice

Address: 8605 Potomac Rd, Potomac, MD, 20854

City: Potomac State: MD Zip Code: 20854

I/We wish to submit the following comments on this project: I am writing in strong support of the Purple Line as a light rail system in Montgomery and Prince George's County. I believe the Purple line will reduce traffic and pollution, as well as reduce commuter times in the region. Also, it will connect people in Prince George's county with the economic development opportunities in Montgomery County.

At the same time I would like to see the Purple Line built in a way that ensures that tenants and small business owners in PG County will benefit rather than be displaced by new development around the Purple line. I would like to see the Purple line legislation accompanied by tenants rights legislation to protect those people.



- RECORD #2250 DETAIL

First Name : Robert
Last Name : Saks
Business Name : Jews United for Justice
Address : 4307 Clagett Road
City : University Park
State : MD
Zip Code : 20082
Email Address :
Submission Content/Notes :
Attachments : Saks_Robert.pdf (489 kb)



Purple Line AA/DEIS Comment Form

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PLEASE PRINT

Name: ROBERT SAKS Organization: VENUS MOVING FOR JUSTICE

Address: 4307 CLARETT RD

City: UNIVERSITY PARK State: MD Zip Code: 20782

I/We wish to submit the following comments on this project: _____

THE PLANS MNCPPC/MTA HAVE FOR LANGLEY
PARK WILL DECIMATE THAT COMMUNITY, DISPLACING
THOUSANDS OF POOR & LOWER MIDDLE CLASS
RESIDENTS & DISPLACING DOZENS OF BUSINESSES.
PLANNING SHOULD NOT GO FORWARD UNLESS
SERIOUS PLANS, WITH TEETH, ARE DEVELOPED
TO GUARANTEE AFFORDABLE HOUSING FOR
IMPACTED
DISPLACED RESIDENTS, & TO PROTECT THE
UNIQUE ETHNIC CHARACTER OF THE
COMMUNITY.

- RECORD #1124 DETAIL

First Name : Marcy
Last Name : Nadel
Business Name : Green Schools at Kennedy High School County Student Govment and Environmental Affairs Task Force
Address : 515 Elm Avenue
City : Takoma Park
State : MD
Zip Code : 20912
Email Address :

Submission Content/Notes : Good morning. My name is Marcy Nadel, M-A-R-C-Y N-A-D-E-L and I represent both the Kennedy High School student body, as the Student Government President and the Montgomery County Student Government Association, as someone on the Executive Board.

Now you may think that Montgomery County, that doesn't exactly pertain to New Carrollton, but I live right on the border between Montgomery and P.G. Counties and I think that the Purple Line would make transportation a lot easier in those two counties.

For the Student Government Association for the entire county, at our last general assembly meeting with representatives from nearly every school in Montgomery County, we proposed legislation on the Purple Line and it passed nearly unanimously.

That means that most students in Montgomery County that were there at the meeting that were more active in their communities, they really believe that this is going to help. It's convenient and also environmentally sustainable for our future.

Our last speaker talked about the future generations and here we are. Students of Montgomery County really believe that this will help. It will help curtail global warming and make the transit system more accessible to students.

People who have jobs, people who need to take the bus to and from work and school, and would like to see their friends, and don't have a car, it makes it a lot faster than buses for them to be able to get to these places and not rely on their parents and friends for cars.

Also, obviously I've already talked about this, it's more environmentally sustainable, less pollution, and less traffic and as students we really would like to see this area grow but not grow in to a huge city with lots of smog and even more traffic than there is now, but Smart Growth, in a better way.

So as you've seen in the recent election, young people are no longer apathetic about politics and that's why I'm here to represent the voice of Montgomery County Public Schools who support the Purple Line. Thank you.

- RECORD #2168 DETAIL

First Name : Marcia
Last Name : Bond
Business Name : League of Women Voters of Montgomery County
Address : 10607 Glenhaven Drive
City : Silver Spring
State : MD
Zip Code : 20902
Email Address :
Submission Content/Notes :
Attachments : Comment Form. M. Bond.pdf (1 mb)



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: MARCIA BOND Organization: League of Women Voters
Address: 10607 Glenhaven Dr
City: Silver Spring State: Md Zip Code: 20902

I/We wish to submit the following comments on this project: _____

I support the LRT even though it may be more
expensive because I believe it will carry
more people more rapidly and is a
quicker alternative. Less impervious
surfaces/pathways should be used whenever
possible and people walkways and bikeways
expanded/included/adapted along whatever
new routes are created.

Creation of either LRT or BRT would
greatly facilitate increased patient visits to
the new Bethesda Naval Hospital/Walter
Reed Army Medical Center.

- RECORD #2225 DETAIL

First Name : Diane
Last Name : Hibino, President
Business Name : League of Women Voters of Montgomery County
Address : 12216 Park Lawn Drive, Suite 101
City : Rockville
State : MD
Zip Code : 20852
Email Address :
Submission Content/Notes :
Attachments : Wrtn Tstmny. League of Wmn Vtrs.pdf (1 mb)



THE LEAGUE OF WOMEN VOTERS *of Montgomery County, MD, Inc.*

Testimony before Maryland Transit Authority in conjunction with The Federal Transit Administration regarding the Purple Line November 18, 2008

Good evening, I'm Diane Hibino, President of the League of Women Voters of Montgomery County. Transportation issues have been a focus of League research, study, discussion and consensus since the early 1960's. We have developed positions on transportation at the local, regional and state levels.

The League has had a long-term commitment to a balanced transportation system with strong support for rapid transit. Following a study and consensus process conducted by the League of Women Voters of Montgomery County in 2000, we concluded that building a rapid transit line, including the Georgetown Branch Trolley (now called the Purple Line), constructed generally south of the Beltway, should be a funding priority.

The League is committed to transportation systems that focus on regional solutions. We also favor transportation services which are made convenient and accessible by minimizing the time required for a trip and providing frequent and reliable service. The Purple Line, light rail option meets both of those criteria.

Based on our recent study of Pedestrian and Bike Safety, we believe that the improvements to the hiker biker trail that will come with the construction of the light rail option on the Georgetown Branch right of way will make safer crossings at busy intersections such as Connecticut Avenue and Chevy Chase Lake Road in Chevy Chase and at 2nd Avenue and 16th Street in Silver Spring. Our League members agree that when building and rebuilding communities, designs should include incentives for using non-motorized forms of travel, particularly bicycling and walking. Safe, convenient hiker biker trails are a big incentive for getting people out of their cars and engaging in healthy exercise. (22 DSH)

Finally the League has long been an advocate for strong stewardship of the environment. Protection of air and water quality is important to our members. Light rail on grass tracks creates much less harmful run-off into our delicate watershed than gas powered buses and automobiles. Our region is already plagued by poor air quality because of auto and bus traffic. Because light rail is estimated to take some 20,000 cars a day off of the road, it will not only keep our air quality from getting worse, it could make it better. Future electricity generation using clean technologies will only enhance the environmental benefits of light rail.

For all of these reasons the League urges you to move forward with the Purple Line.

- RECORD #1350 DETAIL

First Name : Diane
Last Name : Hibino, President
Business Name : League of Women Voters of Montgomery County
Address : 12216 Park Lawn Drive
City : Rockville
State : MD
Zip Code : 20852
Email Address :

Submission Content/Notes : Good evening. My name is Diane Hibino, D-I-A-N-E, H-I-B-I-N-O. I'm president of the League of Women Voters in Montgomery County and we have studied transportation issues over a long period of time. We've done research, study, discussion and consensus since the early 1960's. We've developed positions on transportation at the local, regional and state levels.

The League has had a long-term commitment to balance transportation system with strong support for rapid transit. Following a study in consensus process conducted by the League in 2000, we concluded that building a rapid transit line including the Georgetown Branch trolley, now called the Purple Line, should be a funding priority.

The League has commended to transportation systems that focus on regional solutions. We also favor transportation services which are more, made convenient and accessible by minimizing the time required for a trip and by providing frequent and reliable service.

The Purple Line light rail option meets both of these criteria. Based on our recent 2000 study of pedestrian and bike safety, we believe that improvements to the hiker/biker trail that will come with the construction of the light rail option will make safer crossings at busy intersections such as Connecticut Avenue and Chevy Chase Lake Road and at 2nd Avenue and 16th Street in Silver Spring.

Our League members agree that when building and rebuilding communities, designs should include incentives for using non-motorized forms of travel, particularly bicycling and walking. Safe, convenient hiker/biker trails are a big incentive for getting people out of their cars.

Finally, the League has long been an advocate for strong stewardship of the environment. Protection of air and water qualities important to our members. Light rail on grass tracks create much less harmful run off into our delicate watershed than gas powered buses and automobiles. Our region is already plagued by poor air quality because of auto and bus traffic.

In fact, we rank 86th in carbon omissions nationwide. Because light rail is estimated to take some 20 thousand cars a day off the road, we will not only keep our air quality from getting worse, it could make it better.

Future electricity generation using clean technologies will only enhance the environmental benefits of light rail. For all of these reasons, the League urges you to move forward with the Purple Line. Thank you very much.

- RECORD #13 DETAIL

First Name : Fredric
Last Name : Cooper
Business Name : Linden Civic Association
Address : 2107 Westview Terrace
City : SilverSpring
State : MD
Zip Code : 20910
Email Address : f.cooper@comcast.net
Submission Content/Notes : Please include Linden Civic Association (LCA) in future communications regarding the Purple Line and the CSX/Lyttonsville/Woodside proposed station in particular. LCA represents a community of 500 homes east of the CSX tracks and north of Brookville Rd. I am the Vice President of LCA.

- RECORD #1852 DETAIL

First Name :	Fredric
Last Name :	Cooper
Business Name :	Linden Civic Association
Address :	2107Westview Terrace
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	f.cooper@comcast.net

Submission Content/Notes : Re: Purple Line Alternatives Analysis Draft Environmental Impact Statement

We have reviewed the cited AA/DEIS concerning the long awaited Purple Line. Linden is a neighborhood in Silver Spring bounded by I-495 (the Beltway) on the north, Georgia Avenue on the east, the CSX tracks on the west and Brookville Road on the south.

While the neighborhood has an overall preference for a rail system over a bus system for the Purple Line, with the preference being attributed to a general sense of rails' greater reliability, permanence and speed, the primary focus of our concern is the location of the proposed Purple Line stations.

The AA/DEIS does not go into great detail about the station locations and detail of design. However from related documents it has been stated that the stations will be designed to be 'walkable' and to have passenger drop-off arrangements; and no parking for commuters. We have serious concerns about the proposed Lyttonsville station.

1. To the extent it is located west of the Brookville Road overpass over the Purple Line alignment it will be fairly distant from many residential locations and hence may have limited access by pedestrians, and resulting limited usage.

2. The further its location is beyond walking distance, to the degree it is used, it will proportionally have greater drop-off or 'kiss and ride' ridership. This will mean an increase in traffic flow to the station. We are concerned that the result of a system, the Purple Line, with an objective of getting people to use mass transit and be less auto dependant will cause more auto traffic through Linden to get to the Lyttonsville station.

We propose considering a location further to the east, roughly aligned with Stewart Lane, a street which intersects with Brookville and serves the Brookville industrial area. The benefits of a station located here would include the following:

1. Walking distance proximity to Linden and hence being attractive to a good number of area residents.

2. Improved access for the Rosemary Hills neighborhood, both the single family area and many of the multi family properties, as well as the proximity to the well-utilized Coffield Community Center.

3. Proximity to the main entrance of Forest Glen Annex (FGA) of Fort Detrick (until recently the facility was the Walter Reed Army Medical Center Forest Glen Annex) which is on Brookville Road at Stewart Lane. FGA, under BRAC, is getting several hundred additional employees. Additionally the Walter Reed Army Medical Museum is to be re-located at FGA, which will draw tourists and visitors (we understand from the Army that the museum receives from 50,000 to 55,000 visitors annually). Linden is concerned about BRAC's impact on traffic flow through our neighborhood as a greater number of people will have FGA as their daily destination. The Purple Line, with a station in proximity to the main entrance of FGA, will be able to draw a large number of employees and visitors to it via transit instead of auto.

4. We understand that there is planning going on about long term enhancement of the MARC train's Brunswick Line. Included in that conversation is the potential for a station in the area of Linden Lane (which would also serve FGA, Linden and the new residential development at National Park Seminary). By having a Purple Line station at Stewart Lane these two stations would then be within distance for pedestrians (assuming pedestrian connection from the new MARC station and Brookville Road, which would have to run parallel to the CSX tracks and between the tracks and FGA's perimeter); and provides for an inter-face between MARC-Brunswick and the Purple Line at a location in addition to Silver Spring.

We are concerned that the AA/DEIS's brief reference to BRAC (pages 1-10 to 1-11) did not refer to impact at FGA at all, let alone the transfer of new functions, employees and the museum and the resulting traffic impact on the surrounding area (and the potential for the proposed transit line to provide relief from the traffic impact).

While the AA/DEIS makes some reference to existing land use and comprehensive plans covering areas proximate to the Purple Line alignment it did not discuss the North and West Silver Spring Master Plan which describes the 3,000 people who work in the Brookville industrial area (this is private sector employees and does not include FGA). A Stewart Lane Purple Line station location would provide non-auto access to this employment node. This master plan also includes a recommendation to "maximize" use of public transportation for access to FGA (page 40).

While we believe a Stewart Lane area station location would best serve the objectives of the Purple Line we would not be opposed to an additional station a little west of the discussed Lyttonsville location. At Grubb Road extended at the Purple Line alignment would provide access to the proposed "yard" for the Purple Line in or near the current Montgomery County's Ride On bus system storage and maintenance facility. A stop here would give access the multi family developments on Brookville on the south side of the Purple Line alignment. As a general rule we would favor more stations, not fewer, in order to increase usage. Operationally not every station would need to have every train stop – there could be "local" and "express" stations.

We look forward to the future dialogue on this important new addition to our region's public transit system.

- RECORD #2759 DETAIL

First Name :	Frederic C.
Last Name :	Cooper
Business Name :	Linden Civic Association
Address :	2107 Westview Terrace
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	f.cooper@comcast.net

Submission Content/Notes : LINDEN CIVIC ASSOCIATION
Silver Spring, Maryland

2107 Westview Terrace
Silver Spring, MD 20910-1327
Diane Ratcliff, Director of Planning
Maryland Transit Administration
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

Re: Purple Line Alternatives Analysis Draft Environmental Impact Statement

We have reviewed the cited AA/DEIS concerning the long awaited Purple Line. Linden is a neighborhood in Silver Spring bounded by I-495 (the Beltway) on the north, Georgia Avenue on the east, the CSX tracks on the west and Brookville Road on the south.

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2. The further its location is beyond walking distance, to the degree it is used, it will proportionally have greater drop-off or 'kiss and ride' ridership. This will mean an increase in traffic flow to the station. We are concerned that the result of a system, the Purple Line, with an objective of getting people to use mass transit and be less auto dependant will cause more auto traffic through Linden to get to the Lyttonsville station.

We propose considering a location further to the east, roughly aligned with Stewart Lane, a street which intersects with Brookville and serves the Brookville industrial area. The benefits of a station located here would include the following:

1. Walking distance proximity to Linden and hence being attractive to a good number of area residents.

Linden Civic Association/ Purple Line Letter, page 2

2. Improved access for the Rosemary Hills neighborhood, both the single family area and many of the multi family properties, as well as the proximity to the well-utilized Coffield Community Center.

3. Proximity to the main entrance of Forest Glen Annex (FGA) of Fort Detrick (until recently the facility was the Walter Reed Army Medical Center Forest Glen Annex) which is on Brookville Road at Stewart Lane. FGA, under BRAC, is getting several hundred additional employees. Additionally the Walter Reed Army Medical Museum is to be re-located at FGA, which will draw tourists and visitors (we understand from the Army that the museum receives from 50,000 to 55,000 visitors annually). Linden is concerned about BRAC's impact on traffic flow through our

neighborhood as a greater number of people will have FGA as their daily destination. The Purple Line, with a station in proximity to the main entrance of FGA, will be able to draw a large number of employees and visitors to it via transit instead of auto.

4. We understand that there is planning going on about long term enhancement of the MARC train's Brunswick Line. Included in that conversation is the potential for a station in the area of Linden Lane (which would also serve FGA, Linden and the new residential development at National Park Seminary). By having a Purple Line station at Stewart Lane these two stations would then be within distance for pedestrians (assuming pedestrian connection from the new MARC station and Brookville Road, which would have to run parallel to the CSX tracks and between the tracks and FGA's perimeter); and provides for an inter-face between MARC-Brunswick and the Purple Line at a location in addition to Silver Spring.

We are concerned that the AA/DEIS's brief reference to BRAC (pages 1-10 to 1-11) did not refer to impact at FGA at all, let alone the transfer of new functions, employees and the museum and the resulting traffic impact on the surrounding area (and the potential for the proposed transit line to provide relief from the traffic impact).

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Linden Civic Association/ Purple Line Letter, page 3

We look forward to the future dialogue on this important new addition to our region's public transit system.

Sincerely,

Fredric C. Cooper, for Linden Civic Association
301/960-4162

Cc: Bill Warren, President Linden Civic Association
Linden Civic Association.pdf (58 kb)

Attachments :

LINDEN CIVIC ASSOCIATION

Silver Spring, Maryland

2107 Westview Terrace
Silver Spring, MD 20910-1327

Diane Ratcliff, Director of Planning
Maryland Transit Administration
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

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3. Proximity to the main entrance of Forest Glen Annex (FGA) of Fort Detrick (until recently the facility was the Walter Reed Army Medical Center Forest Glen Annex) which is on Brookville Road at Stewart Lane. FGA, under BRAC, is getting several hundred additional employees. Additionally the Walter Reed Army Medical Museum is to be re-located at FGA, which will draw tourists and visitors (we understand from the Army that the museum receives from 50,000 to 55,000 visitors annually). Linden is concerned about BRAC's impact on traffic flow through our neighborhood as a greater number of people will have FGA as their daily destination. The Purple Line, with a station in proximity to the main entrance of FGA, will be able to draw a large number of employees and visitors to it via transit instead of auto.
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We look forward to the future dialogue on this important new addition to our region's public transit system.

Sincerely,

Fredric C. Cooper, for Linden Civic Association
301/960-4162

Cc: Bill Warren, President Linden Civic Association

- RECORD #219 DETAIL

First Name : kristen
Last Name : hohman
Business Name : locust hill citizens association
Address : 4802 Enfield Road
City : Bethesda
State : MD
Zip Code : 20814
Email Address : kjhohman@yahoo.com
Submission Content/Notes : Please build the Purple Line. Transit is the way of the future. It will benefit all of us, citizens as well as businesses. The Beltway should be left the size it is and future cross-county traffic will get squeeze onto transit. Thank you, Kristen Hohman

- RECORD #2783 DETAIL

First Name : Patricia A.
Last Name : Tyson
Business Name : Lyttonsville Civic Association
Address :
City :
State : MD
Zip Code :
Email Address : patriciatysnnn@aol.com

Submission Content/Notes : MEMORANDUM

To: purpleline@mtamaryland.com

From: Patricia A. Tyson, Secretary (patriciatysnnn@aol.com)
Lyttonsville Civic Association

Charlotte A. Coffield (cacoffield@aol.com)
Member - Lyttonsville Civic Association

Subject: Purple Line Impacts and Concerns of Lyttonsville Community

Our principle concern relates to MTA's likely recommendation to locate a rapid transit maintenance facility in the Lyttonsville community. We do not support putting a maintenance facility in Lyttonsville.

I. To date, MTA has not addressed the following community concerns.

A. The size and location of a possible maintenance facility in Lyttonsville has not been disclosed to community residents

B. Residents are concerned about the noise levels associated with the operation of a transit maintenance facility in our community.

C. Residents are concerned about the hours of operation of the facility and the impact on traffic patterns.

D. Residents are concerned about the number of employees needed for maintenance and their impact on parking, traffic and litter.

E. Residents want more information about the relationship, if any, between a maintenance yard and a possible transit station.

F. Why was the residential Lyttonsville community was selected as a likely site for a maintenance facility?

G. What will be the impact on the community during the construction of a maintenance yard and a possible Lyttonsville station?

II. Other concerns relate to the final transit mode, i.e., light rail transit (LRT) or bus rapid transit (BRT).

Why has MTA not organized a "walk through" of possible Purple Line alignments (and maintenance facility location) in the Lyttonsville community as it has done at some East Silver Spring neighborhoods?

Why has MTA not discussed possible locations of a Lyttonsville transit stop/station with residents?

III. Residents are generally concerned that questions raised by the community during the MTA focus meetings have not been answered to the satisfaction of the community.

cc: Governor O'Malley
Secretary Porcari
County Executive Leggett
County Council President Andrews

Attachments :

Lyttonsville Civic Association.pdf (33 kb)



January 14, 2009

MEMORANDUM

To: purpleline@mtamaryland.com

From: Patricia A. Tyson, Secretary (patriciatysnnn@aol.com)
Lyttonsville Civic Association

Charlotte A. Coffield (cacoffield@aol.com)
Member - Lyttonsville Civic Association

Subject: Purple Line Impacts and Concerns of Lyttonsville Community

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- C. Residents are concerned about the hours of operation of the facility and the impact on traffic patterns.
- D. Residents are concerned about the number of employees needed for maintenance and their impact on parking, traffic and litter.
- E. Residents want more information about the relationship, if any, between a maintenance yard and a possible transit station.
- F. Why was the residential Lyttonsville community was selected as a likely site for a maintenance facility?
- G. What will be the impact on the community during the construction of a maintenance yard and a possible Lyttonsville station?

II. Other concerns relate to the final transit mode, i.e., light rail transit (LRT) or bus rapid transit (BRT).

Why has MTA not organized a "walk through" of possible Purple Line alignments (and maintenance facility location) in the Lyttonsville community as it has done at some East Silver Spring neighborhoods?

Why has MTA not discussed possible locations of a Lyttonsville transit stop/station with residents?

III. Residents are generally concerned that questions raised by the community during the MTA focus meetings have not been answered to the satisfaction of the community.

cc: Governor O'Malley
Secretary Porcari
County Executive Leggett
County Council President Andrews

- RECORD #192 DETAIL

First Name : Laurie

Last Name : Kelly

Business Name : Exec. Director, Maryland International Corridor CDC

Address : 1835 University Blvd. E.

City : Langley Park

State : MD

Zip Code : 20783

Email Address : teukellys@hotmail.com

Submission Content/Notes : The Purple Line is essential to the Langley Park area, which is greatly underserved. We need light rail instead of express bus because:

- The majority of the working class uses public transportation. They need the best mode available;
- It WILL be faster despite minor differences in measured trip times because it will use a dedicated lane along the whole route;
- It will be cleaner for the air, water and soil;
- We desperately need the associated transit center to be built at the Takoma-Langley Crossroads, as well as a stop on University Blvd. at Riggs Rd. The transit center will save the lives of pedestrians using extremely crowded bus stops by getting riders off of the 6-lane arterials, onto the crosswalks, and into the center.
- Light rail will reduce traffic congestion, further improving pedestrian safety as well as travel time;
- Encourage revitalization of our community with new transit-oriented development;
- Create more pedestrian and bicycle access through improved sidewalks, crosswalks and paths.

- RECORD #1148 DETAIL

First Name :	Marc
Last Name :	Kapastin
Business Name :	MICCDC/Quantum Companies
Address :	4912 Del Ray Ave
City :	Bethesda
State :	MD
Zip Code :	20814
Email Address :	

Submission Content/Notes : My name is Marc Kapastin, that's M-A-R-C, K-A-P-A-S-T-I-N. I'm Chairman of Maryland's International Corridor and Community Development Corporation, 1835 University Boulevard, Langley Park, Maryland, and general counsel of Quantum Companies, 4912 Delray Avenue, Bethesda, Maryland.

A bit of background about me. I have served as the Chairman of the Economic Development Committee of the Prince George's Chamber of Commerce, as well as the Director on the Board of Directors of the Prince George's Economic Development Corporation.

For the past 20 years, I have been instrumental in the redevelopment and repositioning of the Beltway Plaza Mall in Greenbelt and we are not finished yet.

University Boulevard, Route 193, is Maryland's international corridor and its intersection with Riggs Road, Route 212, is the center of our universe.

By the way, my company owns five shopping centers and an office building at that corner where incidentally there is a planned purple line stop.

So I'm here tonight in both capacities in support of a light rail alternative for the purple line. As I'm sure you're aware, Montgomery County and Prince George's County have undertaken sector planning for the crossroads at New Hampshire Avenue and University Boulevard as well as the vitally important intersection at Riggs Road and University.

The purple line is the lynchpin and catalyst, the one absolute prerequisite for the redevelopment of the international corridor in the commercial district of Langley Park.

Smart growth dictates the building of a light rail purple line. As the City of Takoma Park recognized in a resolution that passed on Monday night, the purple line would connect many transit dependent residents in both counties with important regional employment centers, including University of Maryland and its transit stops, would foster the substantial development capacity for higher mixed use densities near the proposed stops.

Beltway Plaza and its owners are supporters of the University of Maryland Athletic Department through advertising arrangements as well as the alumni club.

We feel it's imperative that the purple line have a transit stop in the center of campus to serve the sports and cultural event participants as well as the student body and employees of the university and visitors to the university.

We join the city of Takoma Park in its conclusion that light rail transit medium investment alternative would provide the most efficient, convenient, safe and healthy transportation and do the best job of improving the fiscal, environmental and economic health of the inner beltway area of the State of Maryland.

In building the purple line, we would join other enlightened major urban centers of our country in pursuing light rail transit projects to achieve the advantages already realized in Portland, Denver and Charlotte. Some of those other enlightened jurisdictions are Honolulu, Atlanta, Phoenix and Kansas City for starters.

Atlanta's beltline with that 22 miles of light rail transit at a cost of almost \$3 billion to create a multi modal loop utilizing historic rail segments to encircle its urban core, for example.

For all the foregoing reasons and those enumerated by other proponents at these hearings and in the Takoma Park resolution, we enthusiastically support a light rail transit alternative for the purple line.

- RECORD #1432 DETAIL

First Name : Ralph
Last Name : Bennett
Business Name : MOCO Affidavit Housing
Address : 115 Southwood Ave
City : Silver Spring
State : MD
Zip Code : 20901
Email Address :

Submission Content/Notes : Thank you for the opportunity to speak. My name is Ralph Bennett, R-A-L-P-H, B-E-N-N-E-T-T. I represent the Affordable Housing Conference in Montgomery County. We are affordable housing advocates who sponsor three events a year to stimulate interest in affordable housing in the county and to provide occasions for advocates and providers meet for education advocacy and networking.

We're enthusiastically in favor of a fixed route rail option for the Purple Line and believe it is long overdue. The ability to afford housing relates to the cost of living. And while convention suggests that no one should spend more than a third of their gross income for housing, we know that many families in the region which will be served by the Purple Line pay much more than that.

Transportation typically consumes another 19 to 20 percent of such families' total budgets and is essential for access to employment. At current prices, Metro bus cost 2.50 dollars a day from College Park to Bethesda, a total of 625 dollars for a year. Great price, poor service. The trip takes more than an hour, leaving the cars the only viable alternative. Car ownership cost between 6 and 7 thousand dollars, 10 or 11 times the cost of public transportation.

According to a consultant to the town of Chevy Chase, which is expensively opposed to the rail alternative, light rail is faster than bus rapid transit. He contends that a trip from Bethesda to College Park will take 30 minutes on the LRT and 50 minutes on the bus rapid transit along the opponent's favorite route.

Alternatives to bus and car are clearly needed for the region, for the 21st century. Many American cities have shown that light rail is the answer. The convenience and low use cost of light rail are obvious and overdue for all of us. But the benefits will most dramatically effect the lives of our lower income neighbors who now commute to work and school around the beltway. Please build the Purple Line and build it soon. Thank you.

- RECORD #312 DETAIL

First Name : Jack
Last Name : Cochrane
Business Name : Chair, Montgomery Bicycle Advocates (MoBike)
Address :
City : Bethesda
State : MD
Zip Code : 20817
Email Address : WEBGECKO@EARTHLINK.NET
Submission Content/Notes : Ms. Ratcliff,

Please see the attached document containing formal input by Montgomery Bicycle Advocates (MoBike) regarding the Purple Line AA/DEIS. Thank you.

Jack Cochrane

7121 Thomas Branch Drive
Bethesda, MD 20817
webgecko@earthlink.net
301-503-9931

Attachments : MoBikePLltr3.pdf (19 kb)

Montgomery Bicycle Advocates

Montgomery County, Maryland

November 17, 2008

Diane Ratcliff,
MTA Director of Planning,
6 St. Paul Street, 9th Floor,
Baltimore, MD 21202

Re: MoBike comments on the Purple Line AA/DEIS

Dear Ms. Ratcliff:

I am writing to express the views of Montgomery Bicycle Advocates (MoBike) on the proposed Purple Line transit project. MoBike is an advocacy group dedicated to supporting the needs of bicyclists in Montgomery County.

While MoBike does not have a formal position on whether or not the Purple Line should be built, we feel compelled to respond to Purple Line opponents who have claimed that a transit line is incompatible with the Capital Crescent Trail. After carefully reviewing the Purple Line AA/DEIS, we are certain that the Purple Line can be built in a way that does not adversely affect the value and utility of the trail. In fact, the Purple Line provides an opportunity to complete the trail into Silver Spring, a connection that is essential to the trail network and that appears to be very difficult to achieve without the Purple Line.

Protecting and completing the Capital Crescent Trail (CCT) is of paramount importance to us. Whatever Purple Line design is chosen, it must preserve the existing section of trail and support its completion into Silver Spring. It's critical that the CCT be completed so it can serve as the east-west spine of the bikeway network in lower Montgomery County.

We support many of the design features shown in the AA/DEIS that are proposed for the rebuilt trail. We support a paved trail surface, trail bridges and tunnels crossing major roadways, good vertical and horizontal separation between trail and transit wherever possible, and a direct off-road connection between the Capital Crescent Trail and the Rock Creek hiker/biker trail. A number of Purple Line options, particularly the medium and high investment light rail options, would offer major advantages to trail users by eliminating the need for several at-grade crossings of busy intersections such as the ones at Connecticut Avenue, Jones Bridge Road, and 16th Street. If the Purple Line is built, we urge MTA to consider the interests of trail users in the creation of these new crossings when selecting from among the available build options.

It is essential to the integrity and functionality of the trail that it be well connected to the urban centers and other trails at both ends. If the Purple Line is built, then the trail must be built on the direct alignment on a trail bridge over Colesville Road, to have a seamless connection to the Metropolitan Branch Trail in the new Silver Spring transit center. The trail must also remain in the Bethesda Tunnel for a grade separated crossing of Wisconsin Avenue and an easy connection to the western section of the Capital Crescent Trail. We also support an alternate surface route along Willow Street and Bethesda Avenue. This is vital to allowing trail users to cross Wisconsin Avenue during hours when the tunnel is closed, and to provide connections to local destinations.

Our primary objection to the Purple Line as currently envisioned is that the AA/DEIS documents contemplate a final Capital Crescent Trail that is only 10 feet wide. The proposed 10' width is an improvement over the current effective width of the interim trail in some places, but it will not be adequate to meet demand. This is demonstrated daily on the existing paved section of the CCT, where there are regular reports of user conflicts and accidents due to overcrowding. Heavily used regional trails like the CCT should be built to a width of 12' or more. The right-of-way is wide enough to accommodate a 12' trail, and MoBike urges the MTA to evaluate the feasibility and cost of a wider CCT alongside the Purple Line.

A completed CCT would be a vital companion to the rail line, allowing transit users to reach the stations without having to drive. Bicyclists frequently use transit for part of their trips. Therefore good access to transit is essential. We hope to work with you closely as you move forward with the planning process to make sure the Purple Line maximizes opportunities for improved bicycling infrastructure along the entire length of the Georgetown Branch right of way and the Capital Crescent Trail.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Cochran". The signature is fluid and cursive, with the first name "Jack" being more prominent than the last name "Cochran".

Jack Cochran,
Chair, Montgomery Bicycle Advocates
7121 Thomas Branch Drive
Bethesda, MD 20817
webgecko@earthlink.net

cc: Montgomery County Council
Montgomery County Planning Board

- RECORD #2184 DETAIL

First Name :	Jack
Last Name :	Cochrane
Business Name :	Chair, Montgomery Bicycle Advocates
Address :	7121 Thomas Branch Drive
City :	Bethesda
State :	MD
Zip Code :	20817
Email Address :	webgecko@earthlink.net
Submission Content/Notes :	
Attachments :	Letter. JCochrane. Mntgmry Bccl Advcts.pdf (2 mb)

Montgomery Bicycle Advocates

Montgomery County, Maryland

November 17, 2008

Diane Ratcliff,
MTA Director of Planning,
6 St. Paul Street, 9th Floor,
Baltimore, MD 21202

Re: MoBike comments on the Purple Line AA/DEIS

Dear Ms. Ratcliff:

I am writing to express the views of Montgomery Bicycle Advocates (MoBike) on the proposed Purple Line transit project. MoBike is an advocacy group dedicated to supporting the needs of bicyclists in Montgomery County.

While MoBike does not have a formal position on whether or not the Purple Line should be built, we feel compelled to respond to Purple Line opponents who have claimed that a transit line is incompatible with the Capital Crescent Trail. After carefully reviewing the Purple Line AA/DEIS, we are certain that the Purple Line can be built in a way that does not adversely affect the value and utility of the trail. In fact, the Purple Line provides an opportunity to complete the trail into Silver Spring, a connection that is essential to the trail network and that appears to be very difficult to achieve without the Purple Line.

Protecting and completing the Capital Crescent Trail (CCT) is of paramount importance to us. Whatever Purple Line design is chosen, it must preserve the existing section of trail and support its completion into Silver Spring. It's critical that the CCT be completed so it can serve as the east-west spine of the bikeway network in lower Montgomery County.

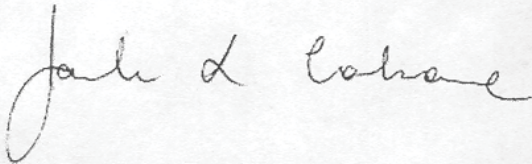
We support many of the design features shown in the AA/DEIS that are proposed for the rebuilt trail. We support a paved trail surface, trail bridges and tunnels crossing major roadways, good vertical and horizontal separation between trail and transit wherever possible, and a direct off-road connection between the Capital Crescent Trail and the Rock Creek hiker/biker trail. A number of Purple Line options, particularly the medium and high investment light rail options, would offer major advantages to trail users by eliminating the need for several at-grade crossings of busy intersections such as the ones at Connecticut Avenue, Jones Bridge Road, and 16th Street. If the Purple Line is built, we urge MTA to consider the interests of trail users in the creation of these new crossings when selecting from among the available build options.

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Our primary objection to the Purple Line as currently envisioned is that the AA/DEIS documents contemplate a final Capital Crescent Trail that is only 10 feet wide. The proposed 10' width is an improvement over the current effective width of the interim trail in some places, but it will not be adequate to meet demand. This is demonstrated daily on the existing paved section of the CCT, where there are regular reports of user conflicts and accidents due to overcrowding. Heavily used regional trails like the CCT should be built to a width of 12' or more. The right-of-way is wide enough to accommodate a 12' trail, and MoBike urges the MTA to evaluate the feasibility and cost of a wider CCT alongside the Purple Line.

A completed CCT would be a vital companion to the rail line, allowing transit users to reach the stations without having to drive. Bicyclists frequently use transit for part of their trips. Therefore good access to transit is essential. We hope to work with you closely as you move forward with the planning process to make sure the Purple Line maximizes opportunities for improved bicycling infrastructure along the entire length of the Georgetown Branch right of way and the Capital Crescent Trail.

Sincerely,

A handwritten signature in cursive script, reading "Jack Cochrane".

Jack Cochrane,
Chair, Montgomery Bicycle Advocates
7121 Thomas Branch Drive
Bethesda, MD 20817
webgecko@earthlink.net

cc: Montgomery County Council
Montgomery County Planning Board

- RECORD #1441 DETAIL

First Name : Ross
Last Name : Capon
Business Name : Nat'l Assoc of RR Passengers
Address : 9220 Shelton St
City : Bethesda
State : MD
Zip Code : 20817
Email Address :

Submission Content/Notes : Ross, R-O-S-S, Capon, C-A-P-O-N. Testifying for myself and my family, Bethesda residents and also as president of National Association of Railroad Passengers. I'm stubborn but not well financed.

When Harry Sanders and I formed the Action Committee for Transit, I had no idea that 22 years later there would still be a question about whether to convert the former freight railroad into light rail and that I would be telling you today that my oldest son, a Maryland senior and daily commuter, has spent a good part of the last four years on the beltway.

I hope my 8-year old, should he attend Maryland, will have better public transportation. That, too, is quality of life. We are pleased that the University has agreed to the right-of-way that the student government pressed for and which will ensure maximum usefulness of the service for the University community.

Rail attracts riders by virtue of greater comfort, generally more on-board space per passenger and a smoother ride and better system identity. Rail is also safer, particularly in bad weather, than buses and more reliable. To people in the Columbia County Club who have worked hard against light rail I recommend a visit to Newton, Massachusetts, where I grew up on the wrong side of the tracks.

However, on the city south side is the Highland Branch, which in the late 1950's was transformed from low frequency diesel railroad to light rail, the Riverside Branch of Maryland's, of MBTA's Green Line. This service is highly successful, boosts property values and bisects the historic Woodland Golf Club founded in 1896.

It is a sad commentary on Maryland priorities that we are still debating whether to build the Purple Line, even as MTA holds hearings on cutting MARC train and transit services and we see continuing cuts on ride on bus service but construction on the inner county connector moves happily along. I've asked Maryland DOT and not received an answer about how the budget cuts were allocated among the mobile administrations and whether the same percentage cuts were applied to the highway administration and the MTA, even though the former is huge and the latter is small and more environmentally beneficial.

Bottom line, here we thank the MTA for however belatedly advancing the Purple Line light rail and we hope to live to see it built. Thank you.

- RECORD #2232 DETAIL

First Name :	Ross B.
Last Name :	Capon
Business Name :	National Association of Railroad Passengers
Address :	9220 Shelton Street
City :	Bethesda
State :	MD
Zip Code :	20817-2410
Email Address :	reapon@narprail.org
Submission Content/Notes :	
Attachments :	Wrttn Tstmny. R.B.Capon.pdf (2 mb)

Support for Purple Line Light Rail Transit

**Statement of National Association of Railroad Passengers
And Ross Capon, NARP President and a Bethesda resident**

Before the

Purple Line Alternatives Analysis/Draft EIS Public Hearing

Chevy Chase, Maryland

November 18, 2008

Thank you for this opportunity to speak.

As a co-founder with Harry Sanders of the Action Committee for Transit back in 1986, I had no idea that, 22 years later, there would still be a question about whether to build light rail on the former B&O freight line—and that I would be telling you at this hearing that my oldest son, a Maryland senior and daily commuter, has spent a good part of the last four years on the Beltway. I hope my eight-year-old, should he attend Maryland, will have better public transportation.

The Purple Line will bring important travel-choice and environmental benefits. We urge that it be built as rapidly as possible.

The Purple Line will enhance the usefulness—and extend the reach of—Metrorail due to connections at Bethesda, Silver Spring, College Park and New Carrollton.

We are pleased that the University of Maryland administration has agreed to the right-of-way that the student government pressed for and which will insure maximum usefulness of the service for the university community.

Bus Rapid Transit, as it has called, is not the right answer. A GAO study found light rail 15.5% less costly to operate than bus. Vehicle life-cycle costs favor rail. Federal Transit Administration will assist in bus replacements at 12 years, rail vehicles at 25 years (and rail vehicles can operate for 30-35 years).

Rail attracts riders by virtue of greater comfort—that is, generally more on-board space per passenger and a smoother ride—and better system identity. Rail also is safer, particularly in bad weather, and more reliable. In a February, 2006, storm, New Jersey Transit shut down its entire bus system but not the light rail lines in Newark and Jersey City. Boston had to remove articulated buses from its Silver Line because they fishtailed dangerously in the snow.

(over)

Our impression is that Bus Rapid Transit, for the most part, is supported by people who really don't want anything at all, or whose main goal is to keep transit of any kind off the Georgetown Branch right-of-way in Bethesda, placing it instead on Jones Bridge Road where it will inevitably serve lower passenger volumes.

To people (and the Columbia Country Club) who have worked hard against light rail, I recommend a visit to Newton, Massachusetts. I grew up there, on the "wrong side of the tracks" (the former Boston & Albany mainline, now MBTA commuter rail and the Mass Turnpike Extension). However, on the city's south side, there is the Highland Branch which, in the late 1950s was transformed from a low-frequency diesel railroad to light rail (Riverside branch of MBTA's Green Line). This service is highly successful and an asset to property values. The line bisects the historic Woodland Gulf Club, founded in 1896.

It is a sad commentary on transportation priorities in Maryland that, even today, we are asking whether to build the Purple Line, and holding hearings on cutting MARC train and MTA transit services, and seeing continuing cuts on Ride-On bus service, but construction on the InterCounty Connector moves along. I have asked Maryland DOT, and not received an answer, about how the budget cuts were allocated among the modal administrations, and whether the same percentage cuts were applied to the Highway Administration and the MTA, even though the former is huge and the latter is smaller and more environmentally beneficial.

Thank you for considering our views.

Ross B. Capon
9220 Shelton St.
Bethesda, MD 20817-2410

National Association of Railroad Passengers
900 Second St., Suite 308
Washington, DC 20002-3557
Web: www.narprail.org
E-mails: rcapon@narprail.org and narp@narprail.org

- RECORD #1171 DETAIL

First Name : Jan
Last Name : Townsend
Business Name : Neighborhood Design Center
Address : 4102 Webster Street
City : N. Brentwood
State : MD
Zip Code : 20742
Email Address :

Submission Content/Notes : My name is Jan Townsend. I'm Program Manager at the Neighborhood Design Center in Prince George's County.

I have been involved in a year-long planning project for the Kenilworth Avenue corridor and I'm anxious to give my views about the type of route that we will have through the Kenilworth area.

I would like to make sure that the route goes directly down Kenilworth Avenue, which I think would be advantageous for the revitalization that we're trying to achieve in the area, and I'm very much pro the idea of an elevated route through that section.

The intersection of Kenilworth Avenue and East/West Highway is already a mess and at peak times the intersection becomes very (inaudible) I don't think it would be practical to have a train coming through in the mix and have light changes involved in that.

The elevated idea is a much, much better idea. It also would allow us to have a station in the Riverdale Road area which would be elevated and allow transit to come in underneath as we see at the Silver Spring Metro station now.

That is the extent of my testimony. I should further point out that Riverdale Plaza is going to be revitalized and having this elevated station would very much tie in with what we're trying to achieve in planning for the revitalization of Riverdale Park. Thank you.

- RECORD #1117 DETAIL

First Name : Pastor Dawn
Last Name : Burrell
Business Name : New Creation Christian Church & Ministries
Address : 7726 Finns Lane
City : Lanham
State : MD
Zip Code : 20706
Email Address :

Submission Content/Notes : "Good morning. It's Dawn, D-A-W-N, last name is Burrell, B-U-R-R-E-L-L. I'm the Senior Pastor of New Creations Christian Church and Ministries. Located in Lanham but actually two blocks up from the New Carrollton Metro Station.

I received information about this hearing not through a mailing, or not through a phone call, but through DeMarche who has already spoken. So I support the comments that he presented to you today. That the Purple Line now is an excellent project for this community.

I speak on behalf of my church as a place of worship where we impact New Carrollton, Lanham and Riverdale area with outreach community services and I believe that this area has been forgotten by many in Prince George's County.

So I believe that the Purple Line will help with economic development. It will assist the low and moderate-income families who are seeking to provide for their families as well as be there for them. So I'm in support."

- RECORD #1476 DETAIL

First Name : Richard
Last Name : Zorn
Business Name : North Chevy Chase Citizens Assoc.
Address : 3508 Glenmoor Drive
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address :

Submission Content/Notes : My name is Richard Zorn. First name is spelled R-I-C-H-A-R-D, last name is spelled Z, the last letter of the alphabet, O-R-N. My address is 3508 Glenmoor Drive, Chevy Chase, Maryland, zip 20815. I'm also a member of a small organization, the North Chevy Chase Citizens Association and one of our primary interests has been this Purple Line but we've had some other local interests also.

I've been following this Purple Line on behalf of the North Chevy Chase Citizens Association for about two years now. We very strongly favor putting in the Purple Line and we strongly favor putting it in with a system that gives us the fastest connections between Bethesda, Chevy Chase, Silver Spring and New Carrollton. So, we would like to see the light rail line, or if failing with, if that's not possible, we'd like to see one of the faster bus rapid transit options than the slower ones and we don't think the one that passes Jones Bridge Road is going to be very fast because of the traffic qualities there and the narrowness of that road.

So we think that probably the best option is the Capitol Crescent Trail and the extension of that trail on the Prince George's County end of the line.

In my own personal case, I commute three or four days a week from my home in Chevy Chase to College Park where I work at the National Archives. And I use an automobile to do this every day but if you put that line in there before I retire for a second time, I've already retired once and then I'm doing this other job now, I will certainly personally make use of it, almost daily basis. Three or four times a week. So, and I, and we have discussed it in the North Chevy Chase Citizens Association and a number of us use it and most of us favor it very strongly.

- RECORD #2538 DETAIL

First Name :	Eden
Last Name :	Durbin
Business Name :	President, North Chevy Chase PTA
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	TQSJ@MAC.COM

Submission Content/Notes : January 9, 2009

To: U.S. Department of Transportation, Federal Transit Administration

Diane Ratcliff, MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Phil Andrews, President
Montgomery County Council

From: North Chevy Chase Elementary School PTA

North Chevy Chase Elementary School

Our school is located on the south side of Jones Bridge Road east of Connecticut Avenue and just south of I-495. We are currently a neighborhood of small and moderately-sized homes. We are a tight-knit community that is moving toward less car use and more walking and biking. Our children walk and ride bikes on the current Capital Crescent Trail and on the sidewalks on both sides of Manor Road and Jones Bridge Road.

Our most serious concern about the Purple Line DEIS is that the BRAC process, moving Walter Read Army Hospital to Bethesda Naval Hospital, has not been addressed. Both of these projects will impact the traffic on Jones Bridge Road and Connecticut Avenue.

NCC School Community—Issues of Concern

Traffic Impact

The Base Realignment and Closure (BRAC) process is estimated to bring an additional 2,500 staff and 1,862 patients and visitors to the hospital every day, according to the Navy's FEIS. This would add cars and vehicles to Jones Bridge Road at the very time children commute to school in the morning and evening rush hours. The intersection of Connecticut Avenue and Jones Bridge Road, where North Chevy Chase Elementary School is located, is already one of the busiest intersections in the state of Maryland. The DEIS proposes the option of a rail station one block south of this intersection. We envision a traffic nightmare that will compromise the safety of the pedestrians and bicycle riders and slow down vehicular commuters.

Loss of parking and sidewalks

With the low-investment BRT alternative, the DEIS reports that the traffic and pedestrian situation would be similar to what it currently is. This is not an accurate analysis of the proposal; losing sidewalks on Jones Bridge Road would greatly decrease pedestrian safety and dissolve the character of our pedestrian-based community.

Development Issues at Rail Stops

Light rail stop at Manor Rd/Connecticut Ave.:

Traffic: It is likely that rail stop at this location would set in motion a significant mixed-use development. Traffic would grind to a standstill if a comprehensive traffic plan is not in place. Once again, the BRAC traffic needs to be considered. If a light rail stop is located at Connecticut Avenue and Manor Road, it should help mitigate the BRAC traffic. We

support mass transit, getting people out of their cars and onto bikes, walking, or getting on the train.

We have many ideas about solutions and would welcome further discussion.

Respectfully Submitted,

Eden Durbin, President
North Chevy Chase PTA

Attachments :

North Chevy Chase PTA.pdf (9 kb)

January 9, 2009

To: U.S. Department of Transportation, Federal Transit Administration

Diane Ratcliff, MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Phil Andrews, President
Montgomery County Council

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Development Issues at Rail Stops

Light rail stop at Manor Rd/Connecticut Ave.:

Traffic: It is likely that rail stop at this location would set in motion a significant mixed-use development. Traffic would grind to a standstill if a comprehensive traffic plan is not in place. Once again, the BRAC traffic needs to be considered. If a light rail stop is located at Connecticut Avenue and Manor Road, it should help mitigate the BRAC traffic. We support mass transit, getting people out of their cars and onto bikes, walking, or getting on the train.

We have many ideas about solutions and would welcome further discussion.

Respectfully Submitted,

Eden Durbin, President
North Chevy Chase PTA

- RECORD #80 DETAIL

First Name :	Howard
Last Name :	Kaplan
Business Name :	North Chevy Chase Transportation Committee
Address :	P. O. Box 343
City :	Kensington
State :	MD
Zip Code :	20895
Email Address :	hkaplan@capaccess.org
Submission Content/Notes :	The focus group meeting minutes, the latest of which is Feb., 2007, contain many questions and concerns. Have these been answered and, are any more meetings scheduled?

- RECORD #1224 DETAIL

First Name :	Woody
Last Name :	Brosnan
Business Name :	North Woodside, Montgomery Hills Civic Association
Address :	9101 Louis Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Woody, W-O-O-D-Y, Brosnan, B-R-O-S-N-A-N. I'm President of the North Woods Side Montgomery Hills Citizens Association representing about 350 homes bordering the proposed purple line light rail route between Brookville Road and 16th Street.

We are in District 18 by Chevy Chase. In a recent survey, our neighborhood voted by better than 3:1 margin to support the light rail option with protections for the neighborhood.

We believe if done right that the purple line would persuade people to use transit instead of cars to get to work, relieving some of the traffic that clogs our streets every morning and evening.

The purple line follows the county master plan that would bring two stations at 16th Street and Brookville Road within walking distance of our residents. This would make traveling to other Maryland suburbs much more convenient by transit.

The bus rapid transit option does nothing for my neighborhood. We have enough buses already.

The purple line also would all completion of the Capital Crescent Trail for a safer walk or bicycle ride to the Silver Spring Metro Station for our residents.

Now the trail effectively ends at the one lane Talbot Avenue Bridge over the CSX Railroad. Trail users are directed to go to Second Avenue and cross six lanes of 16th Street.

The purple line plan calls for a new pedestrian bike bridge next to the Talbot Bridge and a crossing free path along the CSX tracks directly into the Silver Spring Metro Station.

More transit choices also mean more stable property values in uncertain times.

Some of our residents do have concerns that can be addressed if the State of Maryland commits itself to the high level of service that Montgomery County residents expect. That means home inspections to ensure no damage from construction, erection of noise barriers and landscaping where appropriate, parking restrictions to ensure our streets are not used as commuter lots and fencing around the proposed rail yard at Lyttonsville and Brookville Road.

Let me address the opposition. You may have noticed a letter to the Washington Post today by a resident of Chevy Chase that complained about sharing the trail with light rail.

He said, and I quote, "where will all the families with their strollers go?" Well, families in our neighborhood walk their strollers on sidewalks without any problem.

I don't think the county taxpayers intended to spend \$10 million to buy right-of- way just so a couple thousand of our wealthier residents could enjoy their own tree lined baby walk.

Let me put on my hat as a retired journalist who has covered politics for 30 years. A few weeks ago the country voted for change and they put the Democrats in charge.

You know the percentages here locally. During the campaign, President Elect Obama was asked by the Observer about the light rail system in

that city. He replied, "You know if we are designing cities and urban communities and suburban communities around 2-hour commutes, then we are destined to continue down the course of climate change. Mass transit is not only more environmentally sound, but with oil prices sky high and not likely to go down significantly because of increased demand by China and India, it gives individuals much more incentive to look at trains and mass transit as an alternative."

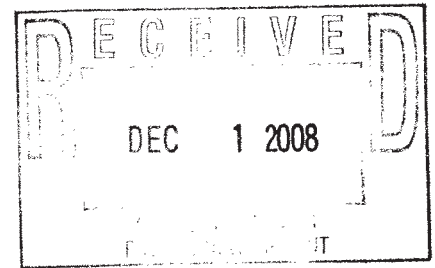
We are within the gaze of the capital and the national press. This is a challenge for the Democratic party in Maryland. Will the governor and other elected Democratic officials follow the lead of the new President, will they side with the working person stuck in traffic jams in the neighborhoods besieged by commuter traffic? Or will they side with the limousine liberals who want change everywhere except in their own backyard? Thank you.

- RECORD #513 DETAIL

First Name :	Jean
Last Name :	Heide
Business Name :	Northmont Citizens Association
Address :	9702 Saxony Road
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	
Submission Content/Notes :	
Attachments :	Forest Grove CA . Northmont CA.pdf (56 kb)

November 26, 2008

Michael Madden, Project Manager
Maryland Transit Administration
6 St. Paul Street, Baltimore, MD 21202



Dear Mr. Madden,

Our community associations, Forest Grove Citizens Association and Northmont Citizens Association, strongly endorse the light rail option for the proposed Purple Line bi-county mass transit connection. The light rail option would involve more initial cost than the various bus line proposals, but would also provide more flexible long-term growth potential, be more environmentally friendly, undoubtedly attract more riders, and lessen the growing user pressure on the existing North-South branches of the Metro Red Line. Although it is not being proposed as part of the Metrorail system as such, the light rail Purple Line option would most effectively serve as an extension of the overall Metrorail System in Maryland, provided that special interests do not manage to deflect the route to the Jones Bridge proposed alternative option based on bus transit.

The proposals employing various bus options all have more downside, both initially and in the long term. Constructing a dedicated "express" bus lane will be nearly as disruptive to nearby properties as any light rail construction, particularly if construction involves widening the right of way along the existing roadways to accommodate the new lane, rather than replacing an existing traffic lane. Any replacement of existing traffic lanes will have an immediate and unacceptable impact on the already congested east-west routes, and the growing traffic pressure will lead to constant commuter agitation to eliminate such bus lanes. Bus traffic, particularly if not in dedicated traffic lanes, will inevitably be subject to the same delays from congestion, traffic lights and accidents as existing bus and automobile traffic. Even dedicated lane express buses will have delays due to traffic at intersections, unless costly underpasses are constructed. Therefore, the term "express" with "bus" will be a certain oxymoron or misnomer.

Given the extensive construction of new concentrated residential and commercial development that the Maryland Counties are now committed to in the impacted areas, Maryland and the two Counties have no real option but to provide an effective East-West light rail mass transit connection. We can not allow the small but well funded groups of special interests in Chevy Chase and their spokespersons to stop or otherwise deflect this light rail option and its logical routing, nor can we be deterred by the "too costly" arguments put forward by some.

Sincerely,

Margot Cook

Margot Cook, President
Forest Grove Citizens Association
1603 Myrtle Rd, Silver Spring, MD 20902

Jean Heide

Jean Heide, Vice President
Northmont Citizens Association
9702 Saxony Rd, Silver Spring, MD 20910

- RECORD #45 DETAIL

First Name :	John
Last Name :	Walters
Business Name :	Oakview Citizens Association
Address :	9901 Dilston Road
City :	Silver Spring
State :	MD
Zip Code :	20903
Email Address :	jwalters@adv-power.com
Submission Content/Notes :	Do you have someone that provides a 15-20 minute presentation on the Purple Line to Civic Association? Feb. 27, 2008 8 PM

- RECORD #2332 DETAIL

First Name : Alice D.
Last Name : McNeil
Business Name : Old Ardwick-Ardmore Citizens Association
Address : 7720 Old Ardwick-Ardmore Road
City : Landover Hills
State : MD
Zip Code : 20784-2363
Email Address :
Submission Content/Notes :
Attachments : McNeil_Alice.pdf (136 kb)



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Alice D. McNeil Organization: Old Ardwick - Ardmore Citizens Association
Address: 7720 Old Ardwick - Ardmore Road
City: Landover Hills, State: MD Zip Code: 20784-2363

I/We wish to submit the following comments on this project: Our neighborhoods do not wish to inherit additional stress from the impact that the proposed Purple Line's "Light Rail"/Bus Transit would deliver to us. Those of us who live in the Old Ardwick - Ardmore Road and the Hanson Oaks neighborhoods have too much noise/air pollution, vibrations and other environmental factors as a result of the impact from AMTRAK, MARK TRAIN, METRO TRAINS/BUSES and ROUTE 50 TRAFFIC. Therefore, we are requesting that of the two New Carrollton Alternatives, please use the "Hickins Road" Alternative. It is unfair to subject any neighborhood to the additional stress that the Purple Line's "Ellin Road" alternative would impact us.

We invite those who will be choosing the New Carrollton Alternative to come spend a couple nights in our home to help those in charge to understand our plight.

Allow us to enjoy our homes. Please don't add unnecessary impact to our lives. We need "Peace" too.

Thanks,
Alice D. McNeil, Old Ardwick - Ardmore Road
Citizens Association
President

- RECORD #1801 DETAIL

First Name : Stuart
Last Name : Moore
Business Name : Old Blair Auditorium Project
Address : 8639 B 16th Street
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : info@oldblairauditorium.org

Submission Content/Notes : I am pleased to submit comments regarding the proposed Purple Line transit project to the Maryland Transit Authority on behalf of the Board of Directors of the Old Blair Auditorium Project, Inc.

The Old Blair Auditorium Project, Inc. is a charitable non-profit organization formed by the community to help re-open the auditorium located in the old Montgomery Blair High School building at the corner of Wayne Avenue and Dale Drive as a mixed-use facility for the performing arts, in-school and after school programs, and community use.

As you may know, the Montgomery County Public School system, working with the County Government, the County Council, and non-profit organizations, will complete a facilities planning study this fiscal year to develop a Program of Requirements for the mixed-use facility.

The Purple Line has great potential to provide transportation for audiences attending events at the auditorium and for students, teachers, staff, and community members utilizing the after school and community use portions of the facility.

The Purple Line also has the potential to adversely impact the facility if street parking is fully eliminated along Wayne Avenue adjacent to the site. It is our understanding per the Maryland Transit Administration's Alternative Analysis/Draft Environmental Impact Statement (AA/DEIS) that the Low Investment and Medium Investment Alternatives will not require full removal of street parking along Wayne Avenue, which is currently used during certain after-school events at the Silver Spring International Middle School and Sligo Creek Elementary School and we expect will also be used during auditorium and community events at the renovated facility.

If the Low or Medium Investment option and a Wayne Avenue alignment is selected, we believe that a Dale Drive station that retains as much street parking as possible would provide great benefit to our community.

We respectfully request that the Planning Board consider future auditorium audience usage and after school and community usage of a station at Dale Drive in making a final recommendation.

Sincerely,

Stuart C. Moore
President
Old Blair Auditorium Project, Inc.

- RECORD #2558 DETAIL

First Name : Stuart C.

Last Name : Moore

Business Name : President, Old Blair Auditorium Project, Inc.

Address :

City :

State : MD

Zip Code :

Email Address : REILLYLC@STARPOWER.NET

Submission Content/Notes : I am pleased to submit comments regarding the proposed Purple Line transit project to the Maryland Transit Authority on behalf of the Board of Directors of the Old Blair Auditorium Project, Inc.

The Old Blair Auditorium Project, Inc. is a charitable non-profit organization formed by the community to help re-open the auditorium located in the old Montgomery Blair High School building at the corner of Wayne Avenue and Dale Drive as a mixed-use facility for the performing arts, in-school and after school programs, and community use.

As you may know, the Montgomery County Public School system, working with the County Government, the County Council, and non-profit organizations, will complete a facilities planning study this fiscal year to develop a Program of Requirements for the mixed-use facility.

The Purple Line has great potential to provide transportation for audiences attending events at the auditorium and for students, teachers, staff, and community members utilizing the after school and community use portions of the facility.

The Purple Line also has the potential to adversely impact the facility if street parking is fully eliminated along Wayne Avenue adjacent to the site. It is our understanding per the Maryland Transit Administration's Alternative Analysis/Draft Environmental Impact Statement (AA/DEIS) that the Low Investment and Medium Investment Alternatives will not require full removal of street parking along Wayne Avenue, which is currently used during certain after-school events at the Silver Spring International Middle School and Sligo Creek Elementary School and we expect will also be used during auditorium and community events at the renovated facility.

If the Low or Medium Investment option and a Wayne Avenue alignment is selected, we believe that a Dale Drive station that retains as much street parking as possible would provide great benefit to our community.

We respectfully request that the Planning Board consider future auditorium audience usage and after school and community usage of a station at Dale Drive in making a final recommendation.

- RECORD #1240 DETAIL

First Name :	Alan
Last Name :	Bowser
Business Name :	Park Hills Civic Assoc
Address :	409 Deerfield Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Good afternoon. My name is Alan Bowser, A-L-A-N, B-O-W-S-E-R. I am the President of the Park Hills Civic Association, a neighborhood association for the East Silver Spring community bounded by Dale Drive and Sligo Creek Parkway and Piney Branch Road and Queen Brier Drive.

Perhaps more than any other residential community along the proposed route for the purple line, our Park Hills neighborhood may be the most affected and impacted by the MTA's proposed alternative routes in East Silver Spring, along Silver Spring and Thayer Avenues, Silver Spring south and the proposed Wayne Avenue alignment Silver Spring north.

To study the purple line's options and to study possible impacts in our community, our neighborhood established a Park Hills Civic Association purple line task force which has met many times over the last two years.

At our initiative, we have met with the MTA's project team several times, Montgomery County council members, members of our state delegation, the Montgomery County executive and attended all of MTA's open houses.

The Chair of our task force, Chris Richardson, was appointed to the Montgomery County National Capital Park and Planning Commission's functional master plan advisory group, and we've worked with the Silver Spring's Citizens Advisory Board and the President's Council of Downtown Silver Spring Civic Association's -

I'm personally very proud of the local process of community engagement that we put together in place in our neighborhood.

As a result of our community's deliberations, the Park Hills Civic Association has taken a number of formal decisions on the purple line issues.

In September, 2007 our Civic Association passed a resolution requesting that MTA assess the impact of an underground alignment on Wayne Avenue. We also asked for detailed studies of traffic.

The Maryland Transit Administration failed to act on either of these requests to our satisfaction. No traffic information was timely provided, no detailed tunneling alternatives for Wayne Avenue were included in the final DEIS.

In February, 2008 we took a vote. The results of that vote, 65 percent of the PHCA members supported a below grade option. Fifty-nine percent of PHCA members did not favor a transit station at the intersection of Wayne and Dale.

Just this past Thursday, the Civic Association again formally considered the purple line issues that affect Park Hills. This time we received the report of our purple line task force.

In our discussion before the formal vote, the association discussed general concerns about preserving the character of our neighborhood and general support for public transit.

While there is strong support for transit and specifically the purple line and light rail options among the Park Hills community and the Park Hills Civic Association, there is little support for an at-grade bus rapid transit or light rail transit option along the proposed Wayne Avenue alignment.

We take comfort that both Governor O'Malley and Montgomery County Executive Leggett have both expressed tunneling through established neighborhoods.

We request that the MTA again fully evaluate a below grade tunneling option for Wayne Avenue to assess cost effectiveness and the impact of travel times and ridership. Thank you.

- RECORD #2286 DETAIL

First Name : Alan
Last Name : Bowser
Business Name : Park Hills Civic Association
Address :
City : Silver Spring
State : MD
Zip Code :
Email Address :
Submission Content/Notes :
Attachments : Bowser_Alan.pdf (3 mb)

- RECORD #1529 DETAIL

First Name :	CHRISTOPHER G.
Last Name :	RICHARDSON
Business Name :	
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	MELCHRIS@EROLS.COM

Submission Content/Notes : WRITTEN COMMENTS ON PURPLE LINE AA/DEIS SUBMITTED BY CHRISTOPHER G. RICHARDSON

Diane Ratliff

Director of Planning

Maryland Transit Administration

I am submitting these written comments to be included in the complete record for the public's review of the Purple Line AA/DEIS. What follows is a somewhat longer version of the testimony I gave at the November 22 public hearing at Montgomery College in Takoma Park.

Maryland Transit Administration

Testimony of

Chris Richardson

Chair of the Park Hills Civic Association's Purple Line Task Force

Public Hearing on

Purple Line Draft Environmental Impact Statement/Alternatives Analysis

Montgomery College

Silver Spring

November 22, 2008

I am an officer with the Park Hills Civic Association, as well as the Chair of the Civic Association's Purple Line Task Force. For the last year I have also served on Montgomery County Planning Board's Purple Line Functional Master Plan Advisory Group. Therefore, through my positions with my civic association and the Advisory Group to the Planning Board, I am very familiar with the details of the Purple Line, my community's concerns, and what has been done or not done to address them.

In Park Hills, we have taken two votes, in February and this week, and both times the opposition to street-level light rail on Wayne has been an overwhelming majority. This week, only 31% of those voting favored

street-level light rail on Wayne. 67% favored one of several other options – no-build, TSM, bus rapid transit, or light rail tunneled under Wayne Avenue. Street-level rail on Wayne is simply not favored in my community.

One of MTA's stated benefits for the Purple Line project is to "complement the over \$400 million in renovations and new construction that are being invested in Silver Spring." HOWEVER, running a street-level train across Georgia Avenue downtown during peak travel period, creating a fifth stream of traffic at the increasingly-gridlocked intersection of Wayne & Fenton, and hampering traffic at the Whole Foods entrance, as well as the Wayne Avenue Parking Garage strikes me and much of my community as pure folly, since it threatens to undo the positive momentum caused by the success of the downtown Silver Spring development – and that success equals increased tax dollars.

MTA has planned extensive widening of Wayne Avenue for left turn lanes, a station at Dale Drive that much of the nearby community does not want. MTA's engineering drawings indicate that nearly two-thirds of the one mile on Wayne on which the surface route would run will be widened. That creates very substantial adverse impacts which are not acknowledged in the Draft Environmental Impact Statement. Many homes and institutions on Wayne will lose portions of their yards, whether they are within the right of way or not. And the widening will clearly increase the traffic capacity and traffic volume on Wayne. Ironically, the surface route of this mass transit system, will increase the number of cars on Wayne, in addition to tying up the business district in gridlock.

I might be more amenable to the Park Hills, Seven Oaks-Evanswood and East Silver Spring communities taking one on the chin as a result of a street-level train on Wayne Avenue and the degree to which the character of these residential neighborhoods would be permanently impacted if the Purple Line

(1) were rapid transit (it's only rapid between Bethesda to Silver Spring);

(2) took a significant number of cars off the road (it only takes a modest percentage);

(3) generated more than 20% new ridership and didn't poach riders from existing transit;

(4) didn't threaten to displace transit-dependent population, for whom the transit system is intended to serve, as a result of high rents stimulated by transit-oriented economic development, particularly in such communities as Long Branch and Langley Crossroads;

I believe that the majority of my community supports a wisely designed west-to-east mass transit but firmly believes that any Purple Line, in

either light rail or bus rapid transit form, must be tunneled under Wayne Avenue and downtown Silver Spring. That will improve the Purple Line for my community, those who use or travel through the downtown, all of Silver Spring, and the greater region. It is clear from recent data from MTA after the study documents were released that tunneling can be included as part of a hybrid alternative with the medium-investment route and tunneled in such a way under downtown as to be cost effective and improve ridership and travel times. My community would look forward to a serious effort in working with the State and County to make tunneling a reality for this segment of the Purple Line.

- RECORD #1269 DETAIL

First Name :	Chris
Last Name :	Richardson
Business Name :	Park Hills Civic Assoc
Address :	402 Deerfield Avenue
City :	
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Chris Richardson, C-H-R-I-S, Richardson R-I-C-H-A-R-D-S-O-N. I am an officer with the Park Hills Civic Association. I am also the Chair of our Civic Association's purple line task force, and for the last year I have also served on the Montgomery County Planning Board's purple line functional master plan advisory group.

Therefore, through my positions with my civic association and the advisory group to the planning board, I am very familiar with the details of the purple line, my community's concerns and what has been done or not been done to address them.

In Park Hills, we have taken two votes. In February of this year and just this past week. Both times the opposition street level light rail on Wayne has been an overwhelming majority.

This week, only 31 percent of those voting favored street level light rail on Wayne. Two-thirds favored one of several other options, either no build, TSM or build options that if and only if they are tunneled under Wayne Avenue.

Street level on Wayne is simply not favored in our community.

One of MTA's stated benefits for the purple line project is "to compliment the over \$400 million in renovations in new construction that are being invested in Silver Spring."

However, running a street level train across Georgia Avenue downtown during peak travel period creating a fifth stream of traffic at an increasingly gridlocked intersection of Fenton and Wayne and hampering traffic at the Whole Foods entrance as well as the Wayne Avenue parking garage.

It strikes me and much of our community as pure folly since it threatens to undo the positive momentum caused by the success of the downtown Silver Spring development, and that success equals increased tax dollars.

MTA has planned extensive widening of Wayne Avenue for left-turn lanes, a station at Dale Drive that much of the nearby community does not want.

MTA's engineering draws indicate that nearly 2/3 of the one mile on Wayne on which the surface route would run won't be widened. That creates a very substantial adverse impacts which are not acknowledged in the DEISAA.

Many homes and institutions on Wayne will lose portions of their yards whether they are within the right-of-way or not, and the widening will create, will clearly increase the traffic capacity and traffic volume on Wayne.

Ironically, the surface route of this mass transit system will increase the number of cars on Wayne in addition to tying up the business district in gridlock.

I might be more amenable to the Park Hills, Seven Oaks, Evanswood and East Silver Spring communities taking one on the chin as a result of a street level train on Wayne Avenue and the degree to which the character of these residential neighborhoods will be permanently impacted if the purple line were rapid transit. It's only rapid between Bethesda to Silver Spring.

If it took a significant number of cars off the road and it only takes a modest percentage, if it generated more than 20 percent new ridership and didn't poach as many riders from the existing transit system and didn't threaten to displace transit dependent populations for whom this system is intended to serve.

So I believe the majority of my companions support a wisely designed east to west mass transit but believes that any purple line must be tunneled under Wayne Avenue. Thank you.

- RECORD #1112 DETAIL

First Name : Richard
Last Name : Meyers
Business Name : Peachwood Civic Association
Address : 14809 Peachwood Drive
City : Silver spring
State : MD
Zip Code : 20905
Email Address : Peachwood1270@verizon.net
Submission Content/Notes : You must ASAP build the Purple Line as a light rail to link Bethesda to College Park. We don't need our roads clogged with more traffic (e.g., buses). Please don't screw this up like the SHA has screwed the taxpayers with the white elephant ICC.

- RECORD #1356 DETAIL

First Name :	Pam
Last Name :	Browning
Business Name :	Petition Drive to Save the Trail
Address :	4317 Elm Street
City :	Chevy Chase
State :	MD
Zip Code :	20815
Email Address :	

Submission Content/Notes : My name is Pam Browning. I spell it P-A-M, B-R-O-W-N-I-N-G. I am the organizer of the petition drive to save the Capitol Crescent Trail. I also was the organizer of the petition drive that successfully opened the tunnel that connects Bethesda from the west side to the east side and I was on the board of directors of an organization which contributed \$45,000 towards building the trestle, which connects the trail with west Silver Spring.

I care a lot about connected with Silver Spring. Without the tunnel and the trestle, several Silver Spring people would not be using that trail today. And there were many Purple Line advocates at that time who opposed the opening of the tunnel and the resurrection of the trestle are even taking up the tracks so that we can have a trail.

The issue of connecting with Silver Spring is a red herring. I support the extension of the Capitol Crescent Trail into Silver Spring and note that the Environmental Impact Statement says, states that the Jones Bridge Road alternative will make the same connection into Silver Spring as the light rail except that it won't destroy the trail in order to extend it.

Yes, we can connect Silver Spring with a beautiful, natural tree lined trail, in fact, the Jones Bridge Road alternative, since it costs less, would have more money left over for better trail connection.

The MTA's Environmental Impact Statement of the Purple Line is a arbitrary and legalistic study that completely ignores the reality that the Georgetown Branch Capitol Crescent Trail functions as one of the most popular urban parks and recreation areas in the nation and that it is surrounded by 17 acres of trees that will be destroyed by the Purple Line if it's on the trail.

The trail is used by hikers and bikers of all ages, races, ethnicities and abilities. It is enjoyed by the elderly, parents pushing their strollers, bird watchers, families with small children, casual cyclists, teens going to and from school, athletes in training and daily commuters.

The trail is often cited as one of the most important amenities and resources in the Metropolitan area. It was documented to have 10,000 weekly uses in 2006 and its use has grown substantially since that time. It is an essential link and a web of connecting trails in the region and for this reason it is heavily used by hikers and bikers from around the Metropolitan area.

And yet, there is no analysis in the DEIS of the significance of the trail to the neighboring communities or to the region. In the state's eyes, this popular trail is not considered by its definition to be a park recreation area or open space. And apparently for this reason the DEIS simply ignores the current use and value of the trail as such. This legalistic interpretation of the law is wrong.

The DEIS is not required to be blind to the popular use of an extraordinary value of the trail in the region. In fact, it must evaluate the impacts that various transit options would have on this important resource, regardless of its definitions.

And why isn't the ENVIRONMENTAL IMPACT STATEMENT analyzing and evaluating major significant tree loss under the Purple Line alternatives? Seventeen acres of mature trees are at stake. Thank you.

- RECORD #1205 DETAIL

First Name : Karren
Last Name : Pope-Onwukwe
Business Name : Prince George's Advocates for Community-based Transit
Address : 6001 43rd Street
City : Hyattsville
State : MD
Zip Code : 20781
Email Address :

Submission Content/Notes : Karren Pope-Onwukwe, K-A-R-R-E-N P-O-P-E - O-N-W-U-K-W-E. Onwukwe means anything in life can be overcome except for death. I think that's appropriate for this discussion because we are looking at financial constraints and many people feel that that may be a reason not to go forward. But I believe that this is an issue that we can overcome, the lack of funds and find the money and the will and the way to make the Purple Line a reality.

I live at 6001 43rd Street. That's in Hyattsville, Maryland, 20781. My office is in Lanham, which is also affected by the Purple Line. I am the co-chair of the Prince George's Advocates for Community-based Transit.

And as your first speaker today mentioned, Ben Ross, we have been laboring in this vineyard for many years. I thank you for coming here. I thank our Administration here in Maryland, the current Governor and of course we're looking forward to a new administration in Washington, D.C. And I think between the two we can look forward to a new vision of how we can make this happen.

Someone talked earlier about how can we go forward with this at this time? One thing is jobs, and I've heard that mentioned by everyone that has come up I believe. Once we break ground people are going to be working on getting this project completed. Economic stimulus. We need entrepreneurial incentives for people to start businesses.

And then finally, it makes sense. This makes so much sense. As I tell my son, who is a junior in college, I told him to do well in school but you got to have common sense if you want to go forward in life and be successful. And this is a common sense response to a much-needed project.

We thank you so much for coming to Prince George's County. We'd like to see the Purple Line continue all the way across the Bridge to get us to Virginia. Thank you.

- RECORD #1169 DETAIL

First Name :	Bill
Last Name :	Wilson
Business Name :	PG Advocates for Community Base Transit/Maryland Convention Council
Address :	6200 West Chester Park Drive
City :	College Park
State :	MD
Zip Code :	20740
Email Address :	

Submission Content/Notes : I'm Bill Wilson, B-I-L-L, W-I-L-S-O-N. Thank you for the opportunity to present my views. I have lived in College Park at 6200 Westchester Park Drive for two years. That's right off of Kenilworth. From 1994 to 2006 I lived on Riverdale Road and Riverdale Park.

I have worked on the College Park campus since 1972 until I retired in 2006. I am very familiar with the eastern segment of the proposed purple line alignment choices.

For 35 years, I have been an active person in many environmental organizations in Maryland, especially the Maryland Conservation Council of which I currently am a Vice President.

For many years, I was an officer in the Baltimore area Transit Association. I helped organize and am now Treasurer of Prince George's Advocates for Community Based Transit. So I have a long standing interest in this kind of thing.

I speak in favor of the light rail transit option. This option would help reduce air pollution by removing excessive cars, especially single occupancy cars, from roads and streets in this vicinity.

I note at rush hour the congestion on Route 1 on the East/West Highway which is Route 410 on Kenilworth Avenue which is Route 201, and on Campus Drive, the main route through the University.

Reducing traffic congestion would be a major accomplishment of building the purple light rail transit line.

The option of bus rapid transit would not be good for a long-term solution. Busways are not so pedestrian friendly as rail and would create more pollution and more noise.

I did examine the draft EIS at the Greenbelt Library, especially the proposed alignments east of Adelphi Road. I support Alternative 7, the medium investment light rail transit from Adelphi Road east.

In terms of crossing the University campus, I strongly prefer the surface route for LRT along Campus Drive. Campus Drive is probably the most congested road on campus, largely because it's the real population center of campus close to many academic buildings and libraries and arts and sports venues.

Campus Drive near the Stamp Student Union is the hub for the university's own bus system. Running the purple line along Campus Drive would allow easy transfer from one system to the other.

Choosing the Prinkert gym alignment that would also move MTA buses there would be a more expensive alternative and would offer worse service to the population centers of the campus.

Moving east, I prefer the surface alignment along Kenilworth Avenue from River Road to Riverdale Road. Tunneling under the parkland would serve transit riders less well and would be much more expensive.

I want to emphasize the important of getting on with this project by deciding all the alignment issues and especially choosing the light rail transit alternative. Thank you for your attention.

- RECORD #1144 DETAIL

First Name :	Clareen
Last Name :	Heikal
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Address :	3117 Laurel Avenue
City :	Cheverly
State :	MD
Zip Code :	20785
Email Address :	

Submission Content/Notes : Hello. I am Clareen Heikal. First name is C-L-A-R-E-E-N, last name is Heikal, H-E-I-K-A-L.

My address is 3117 Laurel Avenue in Cheverly, Maryland. Today I'm representing Progressive Cheverly, a grass roots organization in Cheverly, Maryland.

Progressive Cheverly enthusiastically supports the purple line for the many reasons stated in the draft environmental impact statement, all of which match our guiding values and principles. Economic fairness, equality, sustainable economic practices and collectively working with other communities for the common good.

We believe that the purple line can be built with minimum environmental impacts while the long-term benefits, especially for the light rail transit option, will be enormous.

Specifically we want to weigh in on two points today. We are concerned about the opposition to the purple line from residents of the Chevy Chase area and members of the Columbia Country Club.

This seems to represent a not in my backyard attitude that does not fully appreciate the environmental and social benefits that the purple line can offer to all of the residents of this corridor.

The Columbia Country Club has been strongly resisting what appears to be a reasonable compromise for the purple line's passage along the Georgetown Branch right-of-way.

It is our understanding that this is a public right-of-way that was purchased by Montgomery County after the old railroad stop functioning in 1985 with the explicit purpose of using the segment between Bethesda and Silver Spring for recreation and transit.

It is also our understanding that the country club has fenced off approximately 4/5 of the public right-of-way for its private use.

We feel that the main considerations for MTA should be that the purple line is a proposed public transit system that is to be built on public lands.

Secondly, we believe in green initiatives that promote the kind of urban development that will protect and improve the quality of our environment.

In January, President Elect Obama will take office and we will have a President who understands the urgency of acting to protect our environment, decrease our dependency on fossil fuels and tackle the destructive climate change we are facing.

The purple line will be an important project to demonstrate that we take this challenge seriously. It is imperative that we get a green light to complete the purple line.

We agree with the purple line now that the high investment of light rail alternative while somewhat more costly face much greater dividends in the future as ridership grows and more residents seek mass transit and shorter commutes.

The purple line must be able to meet our needs not just today, not just in 2030, but in the long run.

We feel that this alternative will take more cars off the road other than

the other options and provide faster time, travel time.

The effects of the purple line will be a healthier environment that would allow for more family time, improved quality of air and water, decreased need of car ownership and decrease our collective carbon footprint.

As an added benefit, the Chesapeake Bay in our backyard will become healthier as more cars come off the road.

So in closing I would like to express gratitude to our Prince George's County government officials, our Prince George's County delegation in Annapolis and Senators Barbara McCluskey and Ben Cardin and Congresswoman Donna Edwards on Capital Hill for their support of this purple line. Thank you.

- RECORD #2264 DETAIL

First Name : Clareen
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Zip Code :
Email Address : ms.clare@verizon.net
Submission Content/Notes :
Attachments : Heikal_Clareen.pdf (3 mb)

Purple Line Public Hearings
November 19, 2008
Ritchie Coliseum, U of MD

Hello. My name is Clareen Heikal, residing at 3117 Laurel Ave, Cheverly, MD 20785. I am representing Progressive Cheverly, a grassroots advocacy group in Cheverly, Maryland.

Progressive Cheverly enthusiastically supports the Purple Line for the many reasons stated in the Draft Environmental Impact Statement, all of which match with our guiding values and principles - economic fairness, equality, sustainable environmental practices, and collectively working with other communities for the common good. We also believe that the Purple Line can be built with minimal environmental impacts, while the long-term benefits especially for the Light Rail Transit alternative, will be enormous.

Specifically, we want to weigh in on two points.

We are concerned about the fierce opposition to the Purple Line from residents of the Chevy Chase area and members of the Columbia Country Club. This seems to represent a “**Not In My Backyard**” attitude that does not fully appreciate the environmental and social benefits that the Purple Line can offer to **all** the residents of this corridor.

The Columbia Country Club has been strongly resisting what appears to be a reasonable **compromise** for the Purple Line's passage along the Georgetown Branch right of way. It is our understanding that this is a **public right of way** that was purchased by Montgomery County after the old railroad stopped running in 1985 with the explicit purpose of using the segment between Bethesda and Silver Spring for recreation and transit. It is also our understanding that The Country Club has fenced off approximately 4/5th the **public right of way** for its private use. The 100 foot right of way certainly seems big enough to accommodate a 25 foot transit way and a 10 foot hiker-biker trail with room (65 feet) for a landscaped buffer. We feel that the main consideration for MTA should be that The Purple Line is a proposed **public** transit system that is to be built on **public** lands.

We understand that the Georgetown Branch right of way is a beautiful and heavily used hiker-biker trail that will require some accommodations from the people in that area in order to accept the inclusion of a transit way for the Purple Line. Purple Line Now along with the Coalition for Capital Crescent Trail (CCCT) and the Washington Area Bicyclist Association (WABA), support the development of a workable transit-trail design. Hopefully, the majority of persons in the Chevy Chase area will come to realize that this can be done as well.

Secondly, we believe in “green” initiatives that promote the kind of urban development that will protect and improve the quality of our environment. In January President-elect Obama will take office, and we will have President who understands the urgency of acting to protect our environment, decrease our dependence on fossil fuels, and tackle the destructive climate changes we are facing. The Purple Line will be an important project to demonstrate that we take this challenge seriously. It is imperative that we get the **GREEN light** to complete the Purple Line.

We agree with Purple Line NOW that the High Investment Light Rail Transit alternative, while somewhat more costly, “pays much greater dividends in the future, as rider-ship grows and more residents seek mass transit and shorter commutes.” The Purple Line must be able to “meet our region’s needs not just today, or in 2030, but in the long term. We feel that this alternative will take more cars off the road than the other options and provide faster travel time. We do not believe that Bus Rapid Transit alternatives will do this.

The effects of the Purple Line will be a healthier environment that will allow for more family time, improve the quality of air and water, decrease need for car ownership, and decrease our collective carbon foot print. As an added benefit, the Chesapeake Bay, “*In Our Backyard*”, will become healthier as more cars are off the road.

One can hardly begin to imagine the long term positive impact that the PURPLE LINE will have as it connects 4 metro stations, 3 MARC train stations, and Amtrak. This is truly a regional solution to regional needs.

In closing, I would like to express gratitude to our Prince George's County government officials, our Prince George County delegation in Annapolis, and Senator Barbara Mikluski, Senator Ben Cardin, and Congresswoman Donna Edwards on Capitol Hill for their support of the Purple Line.

Respectfully submitted,
Clareen Heikal
3117 Laurel Ave
Cheverly, MD
(301) 773-0856
Ms.clare@verizon.net

- RECORD #1200 DETAIL

First Name : Rion
Last Name : Dennis
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Email Address :
Submission Content/Notes : Rion Dennis, R-I-O-N D-E-N-N-I-S and I live at 1101 Ivy Club Lane, Landover, Maryland 20785.

Hello. Thank you for this opportunity to testify in favor of the Light Rail Purple Line inside the Beltway. My name is Rion Dennis and I'm the Political Director for Progressive Maryland. A coalition of over 40 statewide and local labor, civil rights, community and religious organizations as well as 15,000 individual members, all fighting for working families in Maryland.

The Light Rail Purple Line is an essential investment we must make in our citizens and working families in order to spur the regions' economic growth in these hard financial times. As a lifelong resident of Prince George's County who commutes into Montgomery County every day, I know first hand how important a Light Rail Purple Line would be for working families, as they will bring the job centers of the region to Prince Georgians'.

With uncertain gas prices and hour- long delays on the Beltway, to add more buses to congested roads is a recipe for more frustration and will require another solution in the not too distant future. A Light Rail Purple Line will give working families an inexpensive, reliable, and environmentally friendly alternative to get around the region.

For those reasons Progressive Maryland strongly supports building a Light Rail Purple Line to help revitalize Inner Beltway communities, alleviate traffic congestion, and bring vital jobs, resources, and opportunity to Prince Georgians and the National Capital Region as a whole. Thank you.

- RECORD #1442 DETAIL**First Name :** Herb**Last Name :** Ettel**Business Name :** Progressive Maryland**Address :** 8720 Georgia Ave**City :** Silver Spring**State :** MD**Zip Code :** 20910**Email Address :**

Submission Content/Notes : Herb, H-E-R-B, Ettel, E-T-T-E-L. More important is that I'm a staff editor representing Progressive Maryland, an organization of grass root organizations with over 15,000 supporters plus 40 affiliated community organizations. We strive to improve the lives of working families in our state and we strongly support building a high investment light rail Purple Line.

Employees and patrons of businesses and organizations in our region would benefit greatly from the savings and time and money and increased customer sales, customers and sales. Tens of thousands will enjoy shorter commutes and save precious time to be more involved with their families and communities. Light rail is far more cost effective than bus lines and better for the environment in many ways. In fact, the Purple Line's entire cost may well be more than made up in medical cost savings alone that result from reduced pollution and stress and increase quality of life in our region.

The Purple Line is vitally needed. Working families who often can not afford cars or soaring gas prices and for whom getting to work by existing bus service is often slow, unreliable and a hardship and who's time in their lives, especially when they're having to piece together two and three jobs will especially benefit.

One last point. It's often said you get what you pay for. Or as my father often said, the cheap pay twice. The cheap pay twice. If you build a Purple Line on the cheap, it won't meet our needs. We'll be disappointed, we'll be paying more down the road in many ways. For decades to come. But if we show the wisdom now of that new deal generation, our grandparents, and invest fully to build this critical infrastructure the way it should be, it will be a gift that keeps on giving from this generation to ourselves, our children and theirs and all who come after.

Attachments : Written Testimony. Progressive MD.pdf (1 mb)

**TESTIMONY OF PROGRESSIVE MARYLAND IN SUPPORT OF
THE PROPOSAL FOR A HIGH-INVESTMENT LIGHT-RAIL PURPLE LINE**

Submitted Nov. 18 by Herb Ettel, Editor on staff of Progressive Maryland.

(This testimony will be kept to one-page in recognition of time constraints, the large number wanting to testify, and the greater expertise of other proponents of our view.)

Progressive Maryland is a grassroots, nonprofit organization of over 15,000 supporters plus 40 affiliated religious, community, and labor organizations. Through research, public education, and direct political action we strive to improve the lives of working families in our state.

With our state headquarters located near the Silver Spring Metro station, and most of our staff and many of our supporters living along the busy corridor through which the Purple Line would pass, Progressive Maryland has a keen interest that the line being built soon and in the best way. We know the employees and patrons of a great many other businesses and organizations in our region would likewise benefit greatly from the savings in time and money, and increased customers and sales. Tens of thousands of current transit riders will enjoy shorter commutes and save precious time to be more involved with their families and communities.

Light rail is far more cost-effective than bus lines. One train can consist of up to three cars holding up to 200 riders apiece (double that of a bus), so one train operator can handle six times the capacity of a bus. Rail cars also have a longer lifespan.

Rail transit is better for the environment. Salt, chemicals, and oil run-off from buses on paved bus lanes contributes to water and soil pollution. Diesel fumes in congested areas have a negative impact on public health and the quality of the pedestrian environment. In fact the Purple Line's entire cost may well be more than made up in medical cost savings alone that result from reduced pollution and stress, and increased quality of life in our region. Even those who continue to commute by automobile or bus will benefit greatly from less traffic congestion.

With gas prices rising, global warming, and continuing substandard air quality, the Purple Line is vitally needed as a vital component in addressing both our economic and environmental crises, and improving the economy, culture and lives throughout our region. Working families, who often cannot afford cars and for whom getting to work by existing bus service is often slow, unreliable and a hardship, will especially benefit. ###

* "You get what you pay for."

Like our grandparents in their New Deal wisdom,

We must pay for the best Purple Line now,

for us, our children, and theirs, and all after them.

- RECORD #760 DETAIL

First Name : Stephan
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Submission Content/Notes : Dear Mr. Madden,

I strongly encourage MTA to do everthing it can to build the Light Rail Purple Line as soon as possible.

Thank you.

Stephan

- RECORD #2773 DETAIL**First Name :****Last Name :****Business Name :** Purple Line Now**Address :****City :****State :** MD**Zip Code :****Email Address :****Submission Content/Notes :**

Attachments : PLN -AA-DEIS Comments Final-011309.pdf (2 mb)
EnReviewRept&PorcariCoverLtr121508.pdf (435 kb)
PLN comments coverltr011309.pdf (335 kb)

PURPLE LINE NOW!

Comments on the Maryland Transit Administration's Alternatives Assessment and Draft Environmental Impact Statement For the Purple Line Transit Project



January 13, 2008

January 13, 2008

Executive Summary

Purple Line *NOW!* (PLN) urges the Maryland Transit Administration to recommend to Governor O'Malley selection of **the Medium Light Rail Transit option, with some adjustments, as the Locally Preferred Alternative for the Purple Line.** We urge MTA to proceed with the submittal of a New Starts Criteria package to FTA so that Maryland can proceed with preliminary engineering of the Medium Light Rail Transit (M-LRT) option for the Purple Line on the most expeditious timeline.

The Governor should support the Medium Light Rail Transit option for the following overriding reasons:

1. The Light Rail Purple Line will be a groundbreaking and successful inner suburban transit project of national importance as the United States tries to encourage the accommodation of future growth in a manner that is more efficient in terms of use of energy and land. This will help us get the greatest level of federal funding possible for the project.
2. The M-LRT option is consistent with State of Maryland policies in support of Smart Growth that are designed to protect our small state's remaining undeveloped or agricultural resources.
3. The M-LRT option is the most affordable and cost effective option with the best chance of meeting long term ridership demand in the corridor.
4. The M-LRT option is the one that is most consistent with relevant County Master Plans for segments of the project for nearly two decades and it will help Montgomery and Prince George's Counties meet important and longstanding policy goals on which these master plans are based.
5. The M-LRT option has received the broadest local support, with positive comments coming to MTA from an overwhelming number of municipalities that have commented on the project including New Carrollton, College Park, Takoma Park, Greenbelt, Edmonston, Hyattsville, Bowie, and others. Comments in support of the M-LRT option have also come from dozens of civic organizations representative of neighborhoods along the alignment between Bethesda and New Carrollton
6. The M-LRT option has received overwhelming support from the regional business, labor and environmental communities. Major organizations representing these important constituencies are ready to work with the Governor to obtain federal funding for this project.
7. The M-LRT option is supported by many organizations concerned about environmental justice issues including CASA of Maryland, Progressive Maryland, Jews United for Justice, and others.
8. The M-LRT option is supported by more than a dozen student groups, including the major student government organizations at the 35,000 student University of Maryland.

PLN believes the AA/DEIS has been carefully prepared but tends to conservatively state the project benefits while the costs and impacts of the project are often stated in a worst-case manner. Despite this, the M-LRT option is well within the range of cost effectiveness under current FTA guidelines to receive approval by the FTA to move forward into design. Additionally, the projected ridership for the M-LRT option is higher than that for most comparable transit projects across the country.

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PLN recommends minor adjustments to the M-LRT option as a basis for moving forward. Summarized in geographic (not priority) order from west to east, these include:

1. Make provisions for the hiker-biker trail to continue passing through the Air Rights Building Tunnel in Bethesda, and increase the proposed standard for the off-road Capital Crescent Trail from 10' to 12' with two 2' shoulders where space is adequate.
2. If tunnel options are explored for the east Silver Spring segment, make provisions to include a stop at Fenton Street serving Downtown Silver Spring, Fenton Village and Montgomery College; if a Fenton Street stop cannot be included with a tunnel option, then we believe preliminary engineering should focus on developing the at-grade alignment for this important segment in a manner that responds especially carefully to local concerns.
3. Devote particular attention in preliminary engineering to stream valley crossings, particularly Sligo Creek, identified as the location of the greatest park impacts.
4. Review the costs and benefits of a grade separation at New Hampshire Avenue to determine if this is warranted for operational and safety reasons. If so, include this option in the preliminary engineering phase.
5. Review grade separation options for the Kenilworth Avenue/East West Highway intersection, including the possibility of an overpass as suggested in testimony from numerous individuals at the College Park and New Carrollton hearings.
6. Evaluate design concepts for the New Carrollton terminus allowing for continuation of the Purple Line further into Prince George's County in the future.

1. INTRODUCTION

Purple Line *NOW!* (PLN) was formed in support of a light rail transit (LRT) connection between Bethesda and New Carrollton seven years ago. The AA/DIES substantiates our belief that a light rail transit option for the Purple Line will prove cost effective in the eyes of the Federal Transit Administration (FTA). Of equal importance, the AA/DEIS demonstrates that the medium LRT option will be successful in serving the east-west transportation needs well into the future – and beyond the narrow 2030 horizon that is the focus of most data in the DEIS. The Purple Line will help reorient development in two of Maryland’s most populous inner suburban counties towards transit and away from single occupancy vehicles in accordance with master plans of both counties and the smart growth vision of the State.

Our comments are intended to highlight areas where we agree with the MTA’s analysis while also pointing to issues that need additional attention during preliminary engineering to ensure the most successful and community-friendly transit project.

The point we wish to make most emphatically in these remarks concurs with the EnReview Technical Review provided as an attachment to our comments:¹

“The benefits of the project are conservatively estimated while the costs and impacts of the project are based on a worst-case scenario and therefore somewhat overstated.”

Our comments are organized by section of the DEIS, with references to the technical reports relating to those sections where appropriate. The rest of our comments are organized in accordance with the outline of the AA/DEIS:

1. In Section 2, we explain why we view the M-LRT option to be most consistent with the Purpose and Need of the Purple Line.
2. In Section 3, we comment on the alternatives considered in the DEIS and present some recommendations for modifications to the M-LRT option for consideration as the project moves forward.
3. In Section 4 we comment on the transportation and traffic section of the DEIS.
4. Section 5 of our comments reviews the environmental issues reviewed in the DEIS.
5. Section 6 includes comments on costs and funding.
6. Section 7 includes our summary as to why the M-LRT should be the selected alternative
7. Section 8 includes our comments on MTA’s public outreach effort.
8. Section 9 is our conclusion.

¹ LaCombe, Sharon, and Carter, Maurice; Purple Line AA/DEIS Technical Review, EnReview, 2008, page 2

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2. PURPOSE AND NEED FOR THE PURPLE LINE

The key statement of the Purpose and Need document for the Purple Line is:

“Faster, more direct and more reliable east west transit service in the Purple Line corridor which would connect the four major activity centers”²

Purple Line NOW! believes that the Medium LRT option (M-LRT) that utilizes the master plan alignment in Montgomery County best meets the Purpose and Need criteria of the Purple Line.

- a. We do not believe that alignments utilizing Jones Bridge Road meet the Purpose and Need because the options proposed will not provide more direct connections between the two activity centers of Bethesda and Silver Spring.

Critics of use of the master plan alignment for the Purple Line have pointed to the Base Realignment and Closure (BRAC) impacts as justification for reviewing the alignment between these two major CBDs. These critics support an option that will more than double travel time between the two downtowns. Yet BRAC will increase jobs in the Medical Center area by between 2,200 and 2,500 jobs – a small percentage of the 73,000 jobs in the Bethesda CBD – Medical Center area. The comparison is even more supportive of a direct route to downtown Bethesda when projections for residential development are considered. Table 1-5 demonstrates the significant growth projected for the Bethesda CBD in terms of both employment and housing. Major residential development is projected for both Silver Spring and Bethesda, while residential development in the Medical Center area is not expected to increase significantly.

Table 1-5: Household and Employment Forecasts

Location	Households			Employment		
	2000	2030	% Change	2000	2030	% Change
Bethesda CBD	6,720	12,938	93%	34,833	41,567	20%
Silver Spring CBD	5,646	14,016	148%	29,741	34,626	16%
New Carrollton	854	1,430	67%	8,705	15,339	76%

Source: Metropolitan Washington Regional Activity Centers and Clusters, Round 7.0 Forecasts, Metropolitan Washington Council of Governments 2007.

- b. We do not believe that the No Build and Transportation Demand Management options meet the project Purpose and Need. They will not be faster or more direct. **Both options will ensure that traffic congestion will have a significant negative impact on economic vitality and livability in the corridor in the future.**

² (2008) MTA, Purple Line AA/DEIS; Executive Summary, page 2

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- c. The M-LRT option for the Purple Line is most consistent with applicable master plans for both counties. It will foster the kind of development sought by both counties because Light Rail Transit is a known catalyst for pedestrian and transit oriented revitalization. Trips within the Purple Line corridor are expected to increase by 43% by 2030. Development in the corridor is expected to be smart growth: mixed use with a pedestrian and transit orientation. The M-LRT option will fit into this vision for the future of the corridor. It will support transit and pedestrian-oriented redevelopment in the New Carrollton Metrorail area as well as in College Park.

Supporters of Bus Rapid Transit point to cities like Ottawa, Canada as demonstrating that BRT is also conducive to development. However, Ottawa is now seeking to expand its transit system with new Light Rail Lines and reviews of the busway there are mixed.³ One thing is clear, it is not easy to move forward with a BRT line and expect that it will be easy to subsequently change it into a LRT line.

- d. The AA/DEIS report demonstrates the tremendous transit market in the Purple Line corridor as well as how the populous corridor is closely linked to the transit accessible and transit dependent regional core. These corridor attributes bode well for the success of the Purple Line:

- The corridor has approximately 169,000 daily transit trips with one or both ends of the trip in the corridor (9.5% of the total regional transit trips).
- 44,000 trips have both ends in the corridor. 60,000 trips are made between the corridor and some parts of the District of Columbia.
- 134,000 are associated with the major activity centers.
- By 2030, daily transit trips are expected to grow by 52% from 1,953,000 to 2,711,000 under the no-build scenario. Those associated with the corridor will grow by 65,000 or 38% to 234,000⁴.

Table 3-9: Regional Transit Trips

	Existing 2000	2030 No Build	2030 TSM	2030 Representative Build Alternative
Trips Associated with Purple Line Corridor	169,000	234,000	302,000	334,000
Trips within Purple Line Corridor	44,000	62,000	65,000	75,000
Total Regional Trips	1,778,000	2,711,000	2,727,000	2,749,000

- e. Purple Line success will result from the fact that it serves an existing highly transit-oriented corridor while also attracting ridership transitioning from personal automobiles. The later

³ (2006) Lietwiler, Charles; Ottawa Busway; http://www.purplelinenow.com/published/news/ottawa_2006.html

⁴ AA/DEIS, p. 1

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market will only be developed if a quality rail option is selected for the project. The project therefore serves two purposes of importance to the Federal Transit Administration (FTA):

- providing better service to low income “Economic Justice” populations and
- providing a quality service that will get more people out of their cars and onto Purple Line trains.

The Purple Line corridor is already developing with a transit-oriented population, even in the wealthier (western) section of the corridor as is shown on Table 1-4 of the AA/DEIS (reprinted below). It is important to note that the relatively high numbers of households without cars will increase in the future due to the aging of the population, difficulty of driving in the increasingly congested area and the cost of owning a motor vehicle. These demographic trends should be considered in the Final DEIS and support the strong ridership.

The Final DEIS should also consider the tremendous regional transit ridership growth of the past two years – a trend that does not seem to be abating despite some softening in gasoline prices.

**Table 1-4: Percent of Households
without a Vehicle**

Community	Percent of Households without a Vehicle
Bethesda	18%
Chevy Chase	11%
Rock Creek Forest / Lyttonsville / Rosemary Hills	13%
Woodside	16%
Silver Spring	24%
East Silver Spring	12%
Long Branch	18%
Takoma Park	16%
Langley Park	25%
Lewisdale	15%
Adelphi	9%
College Park	10%
Riverdale Park / Heights	15%
Glenridge / Beacon Heights	14%
New Carrollton	18%
West Lanham Hills	9%
Montgomery County	7%
Prince George's County	10%
State of Maryland	11%

Source: US Census 2000, Summary File 3

Note: Shaded rows are higher than the corresponding county percentage.

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- f. By 2030 and beyond, under the No Build conditions, roadway congestion will increase due to population and employment growth. Without the Purple Line, transit travel time and reliability will deteriorate as is shown on Table 1-6 of the AA/DEIS. All major roadways are projected to deteriorate to Level of Service (LOS) "F" conditions in the morning and afternoon rush hours. TSM is similarly inadequate. Road widening throughout the area would require far more extensive taking of property and economic dislocation than that projected for the Purple Line and is clearly not a likely or desirable option for addressing traffic congestion. We believe this leads to the following conclusions which form the basis for the tremendous support the Purple Line has received from environmental groups supportive of the light rail Purple Line⁵
- We must make a significant investment in a transit line to provide a good alternative to driving in the future.
 - If we do not improve transit in the corridor, more of the future population growth will need to be accommodated in sprawl type development to the detriment of Maryland's important natural resources.

Table 1-6: Traffic Levels, 2005 and 2030

Location	2005		2030 Projections	
	AADT ¹	LOS AM/PM	AADT	LOS AM/PM
Capital Beltway, Wisconsin Avenue (MD 355) to Georgia Avenue (MD 97) ²	227,575	F/F	285,000	F/F
Capital Beltway, Georgia Avenue (MD 97) to I-95 ²	215,150	F/F	269,000	F/F
Capital Beltway, I-95 to US 502	241,425	E/E	302,000	F/F
Jones Bridge Road at Connecticut Avenue (MD 185) ³	22,300	F/F	27,900	F/F
University Boulevard (MD 193) at New Hampshire Avenue (MD 650) ²	49,825	F/F	62,300	F/F
East West Highway (MD 410) at Connecticut Avenue (MD 185) ²	29,375	F/F	36,700	F/F
East West Highway (MD 410) at 16 th Street (MD 390) ²	32,475	F/F	40,600	F/F
East West Highway (MD 410) at Baltimore Avenue (US 1) ²	25,925	F/F	32,400	F/F
East West Highway (MD 410) at Kenilworth Avenue (MD 201) ²	40,950	F/F	51,200	F/F
Annapolis Road (MD 450) at Veterans Parkway (MD 410) ²	37,925	F/F	47,400	F/F

Notes:

¹ Average Annual Daily Traffic² Source: MD State Highway Administration, 2005³ Source: Purple Line Traffic Studies, 2005

- g. While high investment Light Rail Transit demonstrates the highest ridership and fastest travel time in the 15 year time frame that is the basis for the DEIS analysis, we recognize that the overall cost is daunting. For this and other reasons described in the previous section, we support the M-LRT option as the basis for moving forward with some

⁵ Supportive environmental and planning groups include the Action Committee For Transit, the Chesapeake Bay Foundation, the Chesapeake Climate Action Network, Clean Water Action, Coalition for Smart Growth, Environment Maryland, 1,000 Friends of Maryland, Prince George's Advocates for Community Based Planning, the Sierra Club and others.

January 13, 2008

adjustments discussed below in Section 3. We also believe that the M-LRT, by providing more locally serving stops, is better suited to the characteristics of the corridor than the high LRT option.

3. ALTERNATIVES CONSIDERED

The MTA is to be commended for having completed an objective, efficient and fully informed evaluation of alternatives consistent in every way with FTA's congressional mandate.

- a. **Rejected Options:** Since the selection of the Purple Line corridor for study of transit options, many options have been rejected. Opponents of the M-LRT continue to call for reconsideration of these options. PLN supports the rationale for the elimination of further study of all options that have been deemed unacceptable:
 1. Heavy rail between Bethesda and Silver Spring was rejected due to the \$926 million price tag (2000). In today's funding environment, such an option would have even less likelihood of gaining funding, and FTA cost effectiveness criteria would ensure that it would not continue eastward to serve Prince George's County
 2. The proposed outer Purple Line was similarly rejected (\$5 billion +/-). This proposal would have little value to the Environmental Justice populations served by the M-LRT Purple Line.
 3. The proposed Purple Line Loop through Medical Center (in Montgomery County) was rejected because it would have required taking property from 25 residences along the CSX right of way (ROW), had significant impacts on Rock Creek Park, was more than twice the cost of the equivalent section of the Purple Line, and had no viable way of being extended through to Prince George's County.
 4. Use of Rt. 410 from Bethesda to Silver Spring was rejected because it could not compete with use of the Georgetown Branch right of way in terms of cost.
 5. Use of Rt. 410 through Takoma Park was rejected because it would bypass Long Branch and the Takoma Langley Crossroads area where both counties and the City of Takoma Park want to see revitalization.
- b. **No Build and Transit System Management (TSM)** – PLN believe the AA/DEIS analysis clearly demonstrates that these two options will not prevent the degradation of transit service in the corridor and therefore should be rejected as not adequately meeting the Purpose and Need for the Purple Line. The assessment of these options demonstrates the importance of action to ensure that future traffic congestion in the Purple Line corridor does not degrade the regional economy and quality of life.
- c. **Bus Rapid Transit Options** - In 2004, the administration of Governor Robert Ehrlich added the Jones Bridge Rd. option for the Purple Line, and also broadened the scope to include an

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evaluation of Bus Rapid Transit. While PLN disagreed with the proposed use of Jones Bridge Rd. for reasons stated above under Purpose and Need, we believe MTA has developed a reasonable spectrum of options allowing the Governor to select the best option for recommendation for Preliminary Engineering. Inclusion of the three BRT options helps to underline the advantages of the M-LRT option using the Master Plan alignment.

1. **Low BRT:** This option has gained little support during the AA/DIES hearings. We believe it does not provide a good enough alternative to driving to tap anywhere near the ridership or meet future demand in the corridor.
 2. **Medium BRT:** We oppose this option which does not connect directly with the Bethesda Central Business District. Travel time from Bethesda to Silver Spring is increased from 8 minutes (M-LRT option) to 20 minutes for this option which utilizes Jones Bridge Rd. Doubling the travel time for the project segment with the strongest ridership potential is a fatal flaw of the medium BRT option.
 3. **High BRT:** The high BRT option begins to have costs closer to those of the rail option without the certainty of capacity for the longer term that can be assured with the LRT option. We also oppose this option which will be expensive and run the busway along the Georgetown Branch while not attracting as many riders as the Light Rail transit options.
- d. **Light Rail Transit Options:** During the course of the Purple Line study, the concept for the project has evolved. Initially the focus was on the connections to Metrorail stations and a speedy trip between them. Subsequently, as ridership concepts were developed and evaluated, a focus on the service to communities through which the Purple Line will pass has become more important. This focus supports the reality that the vision for the project must be a compromise between speed and service to localities. PLN supports this evolution of the vision, because we believe the typical Purple Line rider will be looking for access and reliability over speed and that a plan that has few stops along the densely populated corridor is a plan that will not serve these communities well. MTA's ridership analysis supports the view that the project will be successful precisely if it has more stops along the way.

As the importance of the Purple Line as a local-serving transit line became more evident during the development of the AA/DEIS, and given that funding realities limit consideration of underground stations, the evolution in the analysis supported the original concept for the Purple Line as a predominantly at-grade light rail system.

All of the three LRT options include two short tunnels – one from Wayne Avenue to Arliss St. and the other from University Boulevard under Adelphi Rd to Campus Drive.

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1. **Low LRT:** This option appears to be not enough of an investment to attract ridership and received little support during the AA/DIES comment periods.
2. **Medium LRT:** PLN supports this option with the following modifications which are presented in geographic (not priority) order from west to east:
 - a. Include provisions for the hiker-biker trail through the Air Rights Building Tunnel.
 - b. Increase the proposed standard for the off-road Capital Crescent Trail from 10' to 12' with two 2' shoulders where space is adequate.
 - c. If tunnel options are explored for the east Silver Spring segment, make provisions to include a stop at Fenton Street serving Downtown Silver Spring, Fenton Village and Montgomery College; if a Fenton Street stop cannot be included in a tunnel option, then we believe preliminary engineering should focus on developing the most community-friendly option for this important segment.
 - d. Devote particular attention in preliminary engineering to the Sligo Creek crossing, identified as the location of the greatest park impacts.
 - e. Review the costs and benefits of a grade separation at New Hampshire Avenue to determine if this is warranted for operational and safety reasons; if so include this option in the preliminary engineering phase.
 - f. Review grade separation options for the Kenilworth Avenue/East West Highway intersection, including the possibility of an overpass as suggested in testimony from numerous individuals at the College Park and New Carrollton hearings.
 - g. Evaluate design concepts for the New Carrollton terminus allowing for continuation of the Purple Line further into Prince George's County in the future.
3. **High LRT:** The high option provides for faster travel speeds but we believe the resultant loss of stops will be a bad tradeoff between this and the medium LRT option. The high investment option would also be more difficult to finance than the M-LRT option.

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4. TRANSPORTATION AND TRAFFIC

EnReview observes that *“the traffic impact assessment used forecasted travel data from the regional council of governments. An appropriate traffic growth rate factor was used to forecast future No/Build/Build Conditions. **The analysis considers conflicts to other models of transportation and is a complete representation of projected impacts**”*⁶

The DEIS clearly demonstrates that traffic congestion will increase in the Purple Line corridor, with limited transportation improvements programmed to accommodate this growth. While the No Build conditions will include the new Metrorail entrance in Bethesda as well as the Sarbanes Transit Center in Silver Spring and Takoma/Langley Park Transit Center, the only roadway improvements of any consequence are for north-south roads crossing the Purple Line corridor (e.g. Kenilworth, Rt. 1).

Given this situation, the AA/DEIS assessment puts end to end run time for the TSM alternative at 108 minutes nearly double the Medium Investment LRT option (59 minutes). Given the difficulty of maintaining bus schedules on the corridor under current conditions, a greater variation in run time can be expected under future higher traffic conditions. The AA/DEIS reports that travel time on the J-4 bus line can run up to 50% higher than the scheduled times.⁷

The traffic analysis concludes that build options can be selected which maintain traffic conditions while providing a superior transit alternative to what exists today. Six build alternatives would result in adverse effects to traffic at up to four of the 64 key intersections. The primary mitigation strategy will be the construction of turn lanes.

a. Transportation and Traffic data supportive of the M-LRT option.

1. New transit trips are projected to be 19,200 compared to 8,200 under TSM, 15,300 under the medium BRT option and 17,700 under the high BRT option.⁸
2. The percentage increase in user benefits is far higher for M-LRT over M-BRT: 174% compared to 112%.⁹
3. The mode specific user benefits are 225% over TSM for the M-LRT option, compared to 155% for the M-BRT option.¹⁰
4. The reduction of automobile trips is higher in every Traffic District for M-LRT over M-BRT.¹¹

⁶ EnReview, page 13

⁷ AA/DEIS, page 3-2

⁸ IBID, Table 3-8, page 3-5

⁹ IBID, Table 3-12, page 3-7

¹⁰ IBID, Table 3-13, page 3-8

¹¹ IBID, Table 3-16, page 3-9

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5. University of Maryland trips: The UM community is likely to demonstrate considerable elasticity of demand and we believe the final DEIS should explore institutional relationships that might foster higher ridership. We point to the University of Utah which has stimulated ridership through a U-Pass system that results in more than 33% of the 39,000 students and employees using transit to get to the university.¹² Only 1,500 people used transit to get to campus in 1991, a number which was increased to 6,500 when the transit subsidies began – before the light rail line. With TRAX light rail service to campus, the number has fluctuated between 11,700 (January, 2008) and 13,000 (December, 2008).

- b. Projected Level of Service Impacts: Table 3-17 and Table 3-18 suggest the following:¹³
 1. Eliminate from further consideration the high LRT option as currently conceived due to negative impacts on three intersections (Wayne/Dale, Wayne/Mansfield/Wayne/Sligo). Similar impacts are not projected to occur under the M-LRT option.
 2. Eliminate further consideration of the at-grade Campus Drive/Rt. 1 crossing in favor of the proposed traffic-limited crossing at Rossborough Lane.

- c. Pedestrian and Bicycle Access: The M-LRT option will bring substantial pedestrian benefits to the Purple Line corridor. We strongly support these upgrades as an integral part of the transportation project.
 1. Completion of the Capital Crescent Trail between Bethesda and Silver Spring (4.5 miles) including safe grade separations for trail users at Connecticut Avenue, Jones Bridge Rd., 16th St, Spring St. and Colesville Rd.
 2. Completion of Green Trail from Fenton St. to Sligo Creek Parkway in Silver Spring.
 3. Completion of segment of Metropolitan Branch Trail in Silver Spring
 4. Pedestrian upgrades associated with the reconfiguration of University Blvd.
 5. Improved signalization of crosswalks throughout the project area.

- d. Pedestrian Recommendations: We recommend that the project include the following important trail connection:
 1. Cross campus bike lanes connecting to Paint Branch Trail, from University Boulevard through east campus in the University of Maryland/College Park area.

¹² Brandon Loomis "Transit the Smart Thing on U. Campus"; Salt Lake Tribune, January 9th, 2009

¹³ AA/DEIS, Table 17, page 3-15

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5. ENVIRONMENTAL RESOURCES, IMPACTS AND MITIGATION

- a. Introduction: The most important reason for moving forward with a major investment like the Purple Line is that the project will help encourage a more sustainable development pattern in the State of Maryland. The inner suburban areas served by the Purple Line are transitioning from heavy reliance on automobiles dependence to a far greater transit orientation. This evolution has been taking place over the past 30 years, and the Purple Line will accelerate it. According to Figure 4 1-3, the percentage of households in the study corridor without automobiles is about 17%, a number that we believe will increase given the attractiveness of living in the inner suburban ring for many demographic segments with a lower ration of automobiles.

Given the context of the corridor and the extent of natural resources it is impressive that fewer negative environmental impacts are projected to result from the project.

- b. Section 4.1 - Land Use and Economic Activity

The demographics of the Purple Line corridor support the M-LRT investment for reasons going beyond the purely transportation rationale for the project. There are few corridors under study for transit in the United States with existing and anticipated land uses, a real estate market, and sociological conditions so favorable to the successful development of a rail transit line. As is shown in the DEIS:

1. 30% of the study area population is African American, 25% is Hispanic;
2. 18% of residents in the important Langley Park area are living below the poverty line.
3. The population of the two counties served by the Purple Line is expected to grow significantly - 31% in Montgomery County and 23% in Prince George's County.
4. The corridor, with an existing population of 141,000 people is expected to grow at the rate of region.
5. 21% of the corridor's working population use public transportation. This is significantly higher than either counties overall transit usage.
6. Future job growth in the corridor will be substantial; Montgomery County is expecting a 29% increase in jobs by 2030, with Prince George's expecting a 68% increase. Jobs in the corridor are expected to increase by 32%.

PLN believes the M-LRT option for the Purple Line will support the type of land use synergies in the corridor that are desired by a strong majority of Prince Georges' and Montgomery County residents. Light rail will encourage the urban street life shown in the following photographs while BRT will not:

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Figure 1: Houston Texas (photo: Mike Harrington, www.lightrail.net)



Figure 2: Portland Oregon Photo: John Schneider www.Lightrailnow.org)

We also believe that LRT is more compatible with moderate density areas and the hiker-biker trail as shown on the next two photographs:

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Figure 3: Germany – pedestrian crossing of LRT line (in grass tracks) Photo: Anne Ambler



Figure 4: Rheinstetten, Germany – LRT in bike-friendly village center – grass tracks in background; photo: Jon Bell, <http://web.presby.edu/~itbell/transit/images/Karlsruhe/S2-Rheinstetten.jpg>

- c. Light Rail and Property Values: A commonly repeated fear during the planning of rail projects (LRT) and mass transit systems is that such projects do more harm to neighborhoods than good by causing a decrease in property values. However, the most up-to-date studies of Light Rail in the United States clearly show otherwise and MTA should

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include more information on this in the final DEIS. Far from “letting the neighborhood go to hell”, closeness to rail transit is shown to have positive impacts on property values.^{14 15}

The benefits of light rail to land value have been described as two-fold: first, transit opens access to other parts of the region; then, this increased accessibility amplifies the attractiveness of the properties.

Data from US cities with light rail lines confirm the assertion that transit has a positive effect on the properties it serves.

1. **San Diego:** A 1995 study reported that “the typical home sold for \$272 more every 100 meters closer to a light rail station.”¹⁶
2. **Dallas** (DART): Separate studies in 2002 and 2003 discovered that property values near light rail stations rose higher than those properties not served by rail. In one study, property values rose 39% more than a control group not served by rail. Another study found that median residential property values increased 32.1% near rail vs. just 19.5% in other areas. For commercial properties, the increase was 24.7% vs. 11.5%.¹⁷
3. **Portland** (MAX): A series of studies from the 1990s all found that proximity to light rail stations increased the value of residential properties. One study found that correlations between the distance to light rail station and home prices translated to \$75 per 100 feet. Another study found that a typical house sold for about \$663 more per 100 feet closer to a station.¹⁸
4. **Denver:** Homes near a light rail line that opened in 2006 have increased in value by an average of 4% over a period of two years, while the Denver market as a whole has decreased by an average of 7.5%¹⁹. Positive data for transit accessible property in Denver has even come during the more recent economic downturn.²⁰

¹⁴ Litman, T. (2007) Evaluating rail transit criticism. Victoria Transport Policy Institute
<<http://www.vtpi.org/railcrit.pdf>>

Diaz, R. B. Impacts of rail transit on property values. Booz Allen & Hamilton Inc. Mclean, VA
<http://www.apta.com/research/info/briefings/documents/diaz.pdf>

(2004) Light Rail Systems and Property Values; <http://www.slp2.org/documents/propertyvals04.pdf>

¹⁵ (2003) Rail Transit and Property Values; American Public Transportation Association;
http://www.apta.com/research/info/briefings/briefing_1.cfm

¹⁶ (2001) Parsons Brinkerhoff: The effect of rail transit on property values: A summary of studies. (Draft)
<http://www.reconnectingamerica.org/public/show/bestpractice162>

¹⁷ South Sacramento Corridor Fact Sheet; <http://www.sacrt.com/documents/SLP2.pdf>

¹⁸ (2001) The effect of rail...

¹⁹ (2008, Oct. 29) Jackson, Margaret . Light-rail can turn into money train. *The Denver Post*, p. Business
<http://www.denverpost.com/news/ci_10850014>

²⁰ (2008, 11/2) Kraft, Kristal Light Rail Rocks Solid for Home Values Along the Line

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d. Section 4.3 - Environmental Justice

The Light Rail Purple Line rates very high on FTA criteria of service to low income communities. In fact, this is a major strength of the project compared to some others in the United States.

There is much enthusiasm for the project in Long Branch, Riverdale Park and Takoma/Langley Crossroads where a strong majority is very certain the project will be popular and successful. This has lead to concerns that should be addressed by Montgomery and Prince George's Counties as the Purple Line moves forward:

1. Both counties will need to expand policies that increase economic activity in communities along the path of the Purple Line while also expanding affordable housing. This can be done through rental stabilization and new construction done with thoughtful planning.
2. We urge MTA to ensure that construction of the M-LRT Purple Line includes targets for local low income workers.
3. Table 4.1-1 shows projected business property displacements.²¹ The number of displacements is only about 1 per mile. Every effort should be made to preserve and expand existing minority owned businesses along the path of the Purple Line. Relocation assistance may be required for some businesses that will suffer during construction of the line. While some businesses will be displaced in the Purple Line corridor under the M-LRT scenario, we note that opportunities for business expansion will be created at the areas where these dislocations are expected. Along University Boulevard, Kenilworth Avenue and East West Highway the Purple Line will encourage changes consistent with master plans and provide for expanded business opportunities.

e. Section 4.4 - Parks, Open Space and Appendix "Preliminary Section 4F Evaluation Technical Evaluation Rept."

Given the 16 mile extent of the Purple Line, it is fortunate that the overall impact on parks and open space is as low as indicated in the pertinent sections of the DEIS report.

We support the MTA plan to pursue a finding of "de minimis" impact to lands protected under Section 4 (f).

The DEIS observes that the project will have modest impacts on parks through which it passes, placing the overall impact at 2.38 acres for the M-LRT option. Most of this impact is on stream valley parks that must be crossed along any route from Bethesda to New Carrollton. These include Sligo Creek Stream Valley Park (units 1 and 2 - 0.9 acres of the 200 acre park) and the Anacostia Stream Valley Park (0.65 acres of the 114 acre Unit 2 section of the park). All PL options are proposed to cross the Long Branch Stream Valley

²¹ AA/DEIS, Op. Cit., page 4-3

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Park on an existing road and bridge. In all cases the impacted space is a small portion of the overall park (less than 3% according to Table 4.4-1. of the AA/DEIS). The most impacted park will be the 4.7 acre New Hampshire Estates Neighborhood Park where 0.14 acres or 2.89% of the total area is expected to be impacted. Mitigation strategies to offset impacts to all of these natural and park resources should be thoroughly evaluated during preliminary engineering.

1. **Trail Impacts**

- a. **Capital Crescent Trail Corridor status:** We support the finding that *“the interim Georgetown Branch Trail is not considered a Section 4(f) resource because the railroad right-of-way was purchased with the express intent of accommodating transit service in the future.”*²² As noted in the Section 4(f) Technical Report, the Montgomery County Council passed resolutions clarifying its intent in acquiring the public right of way for transportation purposes including both light rail and a trail on August 1, 1995 and July 30th, 1996.

While not a park in the legal sense, we believe the interim Georgetown Branch corridor must be treated sensitively with a park-like landscape along the trail and transit project.



Figure 5: Barcelona, Spain; Light Rail Line along bikeway with grass tracks and plenty of shade
http://farm1.static.flickr.com/7/12328091_00e6b8a7d3_o.jpg

²² AA/DEIS Preliminary Section 4(f) Evaluation Technical Report, page 3-20

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Melbourne, Australia; Decorative catenaries, grass and trees create an aesthetically pleasing transit corridor.

We concur with the Washington Area Bicyclist Association in its recommendation that the trail design standard be 12' with two 2' shoulders wherever this is feasible.

- b. **Broader Trail Network:** The Final EIS should more clearly underline the important contribution that trails make to the success of transit in the corridor. We support integration of the Purple Line with the:
 - 1. Completion of the Capital Crescent Trail into Silver Spring
 - 2. Completion of the Green Trail from Fenton Street to Sligo Creek Parkway.
 - 3. Completion of the terminal segment of the Metropolitan Branch trail where it interfaces with the Purple Line south of the Silver Spring Transit Center.
 - 4. Establishment of a cross-campus bikeway at the University of Maryland
- c. Conclusion: Parks and Parkland: We support the proposed "Measures to Minimize Harm" included in the Section 4(f) Evaluation Technical Report.²³
- f. **Section 4.6 - Visual Quality:** We believe the Final EIS should note the need to provide for the following:

²³ AA/DEIS 4(F) Technical Report, page 4-17

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1. Woodmont Plaza: A coherent design that meets transportation requirements of the project while creating a popular urban people-viewing plaza destination. We believe that movement of light rail trains can contribute to the success of this urban open space as is demonstrated at the cable car terminus in San Francisco and elsewhere. We firmly believe that the Purple Line will help energize the Woodmont Plaza area as light rail lines do throughout the world such as in Place Massena in Nice, France, shown below:



Figure 6: Nice, France. The Central Plaza – Place Massena was overrun with traffic before being completely renovated when the LRT line was completed in 2007 Photo by W. Smedley

2. The Capital Crescent Trail: Relandscaping of the trail between Bethesda and Silver Spring should be done in a manner that:
 - a. Is considerate of the light rail transportation requirements.
 - b. Provides screening for adjacent residents.
 - c. Provides wildlife habitat.
 - d. Creates a visually coherent and attractive corridor for recreational trail users.
 - e. Includes high quality lighting integrated with LRT catenaries.
 - f. Includes grass tracks for rails to reduce runoff, noise and heat load.
 - g. Includes trees to provide shade for trail users.

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Figure 7: Issaquah Valley Historic Trolley, Issaquah, WA

3. Fenton Village-Silver Spring Library Station: This station is closer to the traditional heart of downtown and historic Silver Spring and there is a tremendous opportunity for a visually stimulating space that contributes to the success of both projects.



Figures 8 and 9 Portland State University: Streetcar Line passing under the Student Center alongside an outdoor café
Source: Zimmer Gunsul Frasca Partnerships

4. Wayne Avenue: The at-grade option should include a new streetscape for the segment of Wayne between Fenton Street and Sligo Creek Parkway, including

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new lighting integrated with catenaries, crosswalks and sidewalks, decorative paving to differentiate the green trail from sidewalks, street trees, ornamental retaining walls where required, etc. Community input should be carefully sought to help alleviate any remaining neighborhood concerns about the at-grade alignment.

5. Campus Drive: Campus Drive should be provided with a similar makeover as Wayne Avenue.
6. The “M” traffic circle at the University of Maryland: The “M” is an important iconic feature of the UM campus, but its value has been degraded due to the excessive traffic congestion. The Purple Line provides an opportunity to better connect the “M” to pedestrian pathways and this improved connection should be a goal during preliminary engineering.
7. Rossborough Hall and Turner Hall (“the Dairy”) at the University of Maryland: The University has encouraged relocation of the Purple Line to Rossborough Lane where it passes between the two buildings before stopping adjacent to Ritchie Coliseum. It is important that this entire station area be treated with a high level of sensitivity to the historic campus environment.

g. Section 4.7 -Air Quality and Appendix: Air Quality Tech Report

The AA/DEIS concludes that there will be a slight overall air quality improvement for the build options over the no build ones. While this is put at about .07% overall²⁴, it seems likely that the improvement in air quality should be higher in certain congested sections of the service area should a light rail Purple Line replace diesel buses. This should be evaluated in locations such as downtown Silver Spring where bus and auto traffic is high.

The impact of the Purple Line may be greater if the transit improvement is coordinated with land use changes encouraging the synergy that exists along the Red Line between Friendship Heights and Farragut North. Many people live and work on this corridor without owning cars because of the functional diversity of land uses, and easy access to recreational and cultural facilities.

h. Section 4.8 - Noise and Vibration and Appendix: Noise and Vibration Technical Report

1. Noise: LRT design is proposed to include vehicle skirts that substantially minimize noise impacts – therefore no noise impacts are anticipated from LRT line operations.
2. We support inclusion of sound walls to mitigate noise impacts from LRT at the proposed Glenridge maintenance facility along Veteran’s Parkway. Baffles

²⁴ AA/DEIS – Table 4.7-4

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should also be used in areas where reverberation is likely to amplify noise impacts.

3. Wheel Squeal: This problem should be minimized through design and mitigated where necessary.
4. Vibration: The DEIS states that: *“There are a range of mitigation measures which can be adopted to effectively reduce or mitigate both line operation and construction related noise and vibration impacts”*²⁵ We support the use of LRT skirts and selective use of low sound walls to reduce noise below FTA impact limits.
5. Electromagnetic Interference (EMI): The University of Maryland is concerned about the impact of EMI on campus research facilities. Throughout the world, LRT lines operate in cities with major research institutions. MTA should more thoroughly analyze mitigation strategies as part of the final EIS.

i. Section 4.9 – Habitat and Wildlife and Appendix - Natural Resources Tech. Report.

The DEIS concludes that there is very little wildlife of significance along the Purple Line corridor, the landscape plan for the project should be developed in a manner that provides improved conditions for wildlife as well as an appropriate selection of plant species native to the State of Maryland.

j. Section 4.10 – Water Resources

The Purple Line must be designed in a manner that meets all applicable water quality codes and utilizes best practices for stormwater management.

We echo the testimony of Andy Fellows, Chesapeake Regional Director of Clean Water Action who stated in his testimony that:

The Purple Line will inspire re-development, which is important to restoring regional water quality in a number of ways: It takes advantage of existing water infrastructure, rather than requiring new pipelines and wastewater systems; it speeds the upgrade and repair of that existing water infrastructure; it leverages private sector dollars to share part of the cost of retrofit upgrade for storm water management (reducing flooding, wastewater pipe breaks, drinking water pipe breaks, reducing the quantity and velocity of the flow of storm water, which erodes banks and pollutes our streams in multiple ways. We are in the process of investing millions of dollars in restoring the Anacostia River and its tributaries here in Prince George’s County and in Montgomery County. The Purple Line, by spurring new investments in our communities, is a crucial part of that

²⁵ AA/DEIS; page 4-56

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*restoration. Similarly, it is a key part of the restoration of other tributaries of the Potomac River, such as Rock Creek.*²⁶

1. Use of grass tracks along the Georgetown Branch will reduce runoff, mitigating watershed impacts. Paving this trail for BRT would have a far greater negative impact.
2. Mitigation will be required for the small area of wetlands impacted under the M-LRT scenario. As noted in the Chesapeake Bay Foundation testimony:

*“Up to 1.4 acres of some wetlands impacts are possible (mostly due to bridging,) but such impacts are modest with a project of this scale, and can be mitigated. About a mile of in-line stream and 13-15 acres of floodplain impacts (mostly due to minor fills from additional road/transit-way support) are also possible. The project would need to assiduously protect against erosion with construction on certain soils that occur across the area.”*²⁷

- k. Section 4.12 Hazardous Materials: Table 4.12-3 of the AA/DEIS states that there are 107 properties of relatively high potential for concern with in the corridor. This is an opportunity to clean up some existing nuisance properties.²⁸
- l. Section 4.13 Safety and Security: We agree with the conclusion that pedestrian-transit conflicts are generally manageable along the Purple Line corridor. However, we want to make two points about this important issue.
 1. Safety conditions along the Capital Crescent Trail between Bethesda and Silver Spring will be significantly improved if the grade separations are completed as planned. The existing interim trail is very unsafe as is shown in the photograph below:

²⁶ Fellows, Andrew; Purple Line Testimony, November, 2008

²⁷ Girard, Jr., Alan; Testimony by the Chesapeake Bay Foundation Concerning the Purple Line Transit way Alternatives Analysis/Draft Environmental Impact Statement (11-18-08)

²⁸ AA/DEIS, page 4-83

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Figure 10: The dangerous Georgetown Branch Interim Trail at 16th St. and 2nd Avenue
Photo by Wayne Phyllaier

2. We do not believe the DEIS adequately evaluates the safety issues of the proposed Preinkert alignment in comparison to those of the Campus Drive alignment through the University of Maryland. If the Preinkert option will result in all buses being routed through the narrow gap between LeFrak Hall and the South Campus Dining Hall, we believe the safety challenges will be far greater than if this route included only the Purple Line. This should be clarified and considered in weighing the relative merits of the two alternatives.

6. COSTS AND FUNDING

a. 5.1 - Capital Costs

It is very helpful that MTA has done such a thorough cost evaluation. EnReview has observed that:

*“the data presented goes beyond that normally required at this stage of project development. The level of detail that is provided in the several hundred pages of attachments far exceeds what is required for selecting between alternatives at the AA/EIS level. However, the FTA is becoming more demanding on capital cost detail as projects move closer to implementation in order to avoid unexpected costs above budgets that are used for decision making.”*²⁹

EnReview goes on to make the general observation that:

²⁹ EnReview, p. 5

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“the features (cost categories) of rail alternatives have been defined more severely (higher resulting costs than cost related to the bus options).”³⁰

These cost projections should be reviewed more carefully in the Final EIS.

- b. Section 5.2 Operating Costs and Appendix – O&M Cost Estimate Technical Report
The EnReview reviewers have observed that:

“operating costs seem unusually high for the light rail alternative”.

EnReview speculates that, while MTA’s existing Baltimore LRT line is the *“most appropriate to use for modeling the cost of the Purple Line, there are anomalies in recent data that appear to be yielding trend results that are in variance with what the writer believes are likely results”*.³¹

We concur with EnReview’s conclusion that more favorable O&M predictions may be developed when a clearer operation plan is worked out during preliminary engineering. Nonetheless, EnReview concludes that:

“even with the values presented, this reviewer finds the LRT options to be significantly more attractive than the bus options.”³²

7. EVALUATION OF ALTERNATIVES

PLN believes the medium Light Rail Transit option is the best alternative in terms of effectiveness in meeting the project’s purpose and need.

There are many reasons for supporting the M-LRT option. These are summarized on the following three pages:

Why Medium LRT is the best Alternative

Light Rail Will Serve More Riders and Divert More Autos than BRT

If the Purple Line is built according to Montgomery County’s Master Plan, using a light rail system along the Georgetown Branch Rail right-of-way, it is estimated that up to **68,000 trips per day** would be taken on quiet, comfortable light rail trains instead of our congested roadways. **Projected ridership of the**

³⁰ EnReview, p.6

³¹ IBID, p. 10

³² IBID, p. 11

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various alternatives is outlined in the following table. Light rail has higher ridership and takes more cars off the road than BRT.

BUS RAPID TRANSIT (BRT)	Ridership	Diverted from Auto Use
Low Investment BRT	40,000	11,400
Medium Investment BRT – JBR (SSE)	50,000	14,500
Medium Investment BRT to Bethesda	51,800	15,300
Medium Investment BRT – via Georgetown Branch to Bethesda, then Woodmont Ave to Medical Center	58,000	16,100
High Investment BRT	58,900	17,700
LIGHT RAIL (LRT)	Ridership	Diverted from Auto Use
Low Investment LRT	59,300	18,200
Medium Investment LRT	62,600	19,200
High Investment LRT	68,100	20,500

Light Rail is Much Faster than BRT – Sample Travel Times

All of the light rail options result in travel times between Bethesda and Silver Spring or College Park that are nearly twice as fast as the bus rapid transit (BRT) alternative developed by Sam Schwartz Engineering (SSE) for the Town of Chevy Chase.

Estimated Travel Times: Bethesda to Silver Spring or College Park

Bethesda to Silver Spring

- **SLOWEST:** Medium investment BRT via Jones Bridge Rd (SSE).....20 min.
- Medium investment BRT via Georgetown Branch.....19 min.
- Low investment Light Rail Transit (LRT).....12 min.
 - Medium investment LRT.....9 min.
 - **FASTEST:** Higher investment LRT.....9 min.

Bethesda to College Park

- **SLOWEST:** Medium investment BRT via Jones Bridge Rd (SSE).....50 min.
- Medium investment BRT via Georgetown Branch.....49 min.
 - Low investment LRT.....38 min.
 - Medium investment LRT.....34 min.
 - **FASTEST:** Higher investment LRT.....30 min.

Travel times are based on the Purple Line Alternative Analysis (averaged for the round trip) and SSE Jones Bridge Road alternative.

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LRT Has Greater Capacity that Better Serves Long Term Needs

When looking out beyond the 2030 forecast year, the BRT alternatives would reach their more effective capacity limits sooner than the LRT alternatives. The Purple Line 2030 ridership forecasts show a level of ridership higher than most BRT and LRT systems in the United States.

- While the LRT and BRT alternatives have six-minute headways for the length of the Purple Line corridor, the operating & maintenance costs for the BRT alternatives assume additional "tripper" service inserted between Silver Spring and Bethesda -- a minimum of 7-8 additional runs per hour. That would bring the gaps between the buses to between 3 and 4 minutes. On the Medium and High BRT segments in Bethesda that operate on street (Pearl Street to the Bethesda Metro Station - North and South Entrance) buses at some point in the future would start "stacking up" at the traffic signals with cycles of 90 or more seconds and limiting the practical upper service capacity level of the BRT alternatives. LRT by virtue of its higher train capacity and operating in "a practically exclusive" operating environment would have a higher upper limit in service capacity.
- Beyond 2030 Medium and High BRT could be expected to reach that capacity threshold with the growth in ridership beyond 2030 or even sooner if higher than forecasted ridership levels. LRT has the capacity to absorb that growth for a longer time horizon. With higher gas prices, Purple Line ridership could be even higher than forecasted.
- The operating plan for these estimates were based on using transit car capacity estimates closer to bus manufacturers' estimates rather than experience in Washington DC region. With heavy Metrorail ridership, WMATA has found that "choice" riders require more comfortable, less packed conditions. Using local experience may mean that buses run every two minutes. LRT trains have three times the capacity so a three car LRT train every six minutes has the same capacity as a 60 foot bus every two minutes.

Other Reasons Why LRT is better than BRT for the Purple Line

While Bus Rapid Transit (BRT) is desirable for many potential transitways, it is not the preferred solution for the Purple Line.

- Between Silver Spring and Bethesda, BRT would require 20-25' of paved roadway (plus shoulders) to be added for bus lanes where no road exists today. This section would be using some portion of the abandoned Georgetown Branch Railroad right-of-way even in the Jones Bridge Busway option. The MTA has proposed "grass tracks" for the LRT solution while similar solutions for bus lanes are rare.
- BRT would add steerable buses next to the Capital Crescent Trail with the buses subject to driver error or slippery conditions. And all buses would have some local exhaust emissions and runoff whether they are diesel, natural gas or hybrid.
- The poster child for BRT in North America is Ottawa, Canada. Recently that city has decided to expand their transit system by LRT lines and is seeking funding to do that.
- Light Rail has been specified on the County's Master Plan since 1990 when the Georgetown Branch Master Plan was approved. That process rejected buses on a busway between Bethesda and Silver Spring. That Master Plan includes the following statement: *"In the event future*

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consideration is given to implementing additional double track sections, the existing right-of-way is generally sufficient with appropriate structural treatment to accommodate the necessary typical 56-foot trolley/trail cross section (see Figure 4), except along the Metropolitan Branch section from Talbot Avenue to Silver Spring.³³

Major Advantages of Light Rail Compared to the Jones Bridge BRT Proposal

- **Light Rail Provides Unimpeded Travel Between Silver Spring and Bethesda and Accommodates Future Growth:** LRT would provide a direct, unimpeded connection between the Red Line Stations at the Silver Spring and Bethesda Central Business Districts (CBDs). The BRT on Jones Bridge Road would be delayed by turning cars and intersection delays at Connecticut and Wisconsin Avenue and results in a longer routing connecting the larger markets at the CBDs. This alternative would build in capacity constraints that would worsen over time as traffic continues to increase. The ability to react should ridership exceed predictions would be severely limited.
- **BRT Along JBR Means Eminent Domain, Light Rail Does Not:** Accommodating SSE's dedicated BRT lanes along Jones Bridge Road requires taking of private property at intersections and station areas to accommodate the necessary width. Or, policy decisions would have to be made to ban automobiles on existing traffic lanes and allow only buses within the existing right of way. In contrast, light rail and the trail can be accommodated in the available right of way all the way to the entrance to Bethesda Station.
- **Light Rail Means 1.8 Million Fewer Auto Trips a Year Than the Jones Bridge Road BRT:** LRT would remove approximately 4,000 - 6,000 more trips per day than the JBR BRT alternative advocated by SSE. This represents an annual reduction of over 1,800,000 auto trips per year. Light rail will result in 2,500,000 more user benefit hours than the SSE alternative, according to MTA.

Economic Development and Light Rail

The Purple Line will not just improve our local transportation network, it also provides key regional connections that add to Montgomery County's connectivity with other key economic resources throughout the region (University of Maryland, Greenbelt/MARC, New Carrollton station/Amtrak) without sitting for hours on the Beltway. It pulls together a regional network of destinations that would be accessible from many points in Montgomery County via an efficient, high-quality transit service. This adds significantly to our competitiveness and attractiveness as a business location, as well as being highly appealing to potential knowledge workers who live beyond the County's borders but who could be brought within a reliable 45 minute commuting radius to many jobs by a light-rail Purple Line. Think about a future where leading documentary film makers, and related communications industry leaders, could leave their offices in or around the Discovery headquarters (leave their car at home), hop on the Purple Line for a quick trip from Silver Spring to New Carrollton to connect to a less-than-three-hour trip to Manhattan on the Amtrak Adela. That is how to make Silver Spring thrive as the number-two communications industry center on the east coast.

According to the new DEIS, light-rail options outperform BRT options across the board from a transportation standpoint, and of particular note are the significant differences in travel times. LRT

³³ Montgomery County, Maryland; Georgetown Branch Approved Master Plan, 1990, page 49

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vastly outperforms BRT on this critical performance measure: it is not even close. Light rail creates a vastly larger area that would be within the "magic" 45-minute commute window for major job centers. BRT options do not significantly increase this area. Research shows if employees have to commute more than 45 minutes each way, employers simply cannot retain them for more than 6 months on average.

The Purple Line will contribute greatly to future economic development, increased property values, and the re-development of underutilized areas and hard-hit communities, particularly around the planned station areas. The economic development impacts of a light rail option would surpass what you could achieve with a bus-rapid-transit system. Specific locations that would be most positively impacted would be consistent with smart growth goals, master plans, etc. This will significantly boost the assessable tax base, which at a time of grave economic crisis, ought to be everyone's overriding priority. This adds many millions of dollars in future tax revenue to the Counties and State, for years to come without raising tax rates.

8. PUBLIC OUTREACH AND COORDINATION TECHNICAL REPORT

EnReview Consulting has reviewed the AA/DEIS for consistency with FTA and CEQ guidelines and found the document to be consistent with U.S. Department of Transportation regulations as codified in the Code of Federal Regulations at 7771 Part 123 and in the CEQ's scoping Memorandum guidance.³⁴ EnReview observes that:

*"The regulatory requirements for scoping activities were surpassed" ... "Public Outreach for the project exceeded the requirements of NEPA and the preparation of EIS documents" ... "MTA was responsive to the comments obtained during the scoping process. Alternatives that were not considered reasonable were documented as such and alternatives that deserved further study were added to the alternatives analysis."*³⁵

9. CONCLUSION:

Purple Line *NOW!* believes that the State of Maryland has the opportunity to construct the most successful Light Rail Transit line in the country if the State moves forward with the Purple Line connecting Montgomery and Prince George's Counties. We strongly endorse the M-LRT alternative with the recommended modifications included in this document. This alternative:

- a. Has greater capacity than BRT.
- b. Will better help revitalize communities.
- c. Is quieter and less polluting than buses or automobiles.
- d. Is cheaper and more flexible than Metrorail.
- e. Is more compatible with a hiker-biker trail than buses.

We urge the Secretary and Governor to request approved by FTA for moving forward with preliminary engineering of the Medium Light Rail Transit option for the Purple Line on the most aggressive timeline.

³⁴ EnReview, page 2

³⁵ EnReview, page 3



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December 14, 2008

Mr. John Porcari, Secretary
Maryland Department of Transportation
7201 Corporate Center Dr. P.O Box 548
Hanover, Md. 21706

Dear Mr. Porcari:

I am writing to share with you a report, prepared by independent consultant, EnReview Consulting, on the Purple Line DEIS. This report confirms our impression that the DEIS is a well written product that is compliant with the applicable National Environmental Policy Act statutes in every way.

EnReview Consulting is a nationally known firm with experience in evaluating and Drafting Environmental Impact Statements. The firm's principle, Sharyn C. LaCombe worked with Maurice M. Carter on the review. The resumes of both Ms. LaCombe and Mr. Carter are included in the first page of the report.

The goal of this study was to evaluate the completeness of the DEIS by comparing it to other similar reports. A secondary goal was to make some judgments about the merits of the options presented in the DEIS and recommendations for the next phase.

The conclusion of this report is that the Medium Light Rail option of the Purple Line "is a very good project". It includes other significant findings. Most importantly, this review finds that the "benefits of the project are conservatively estimated while the costs and impacts are based on a worst-case scenario and therefore somewhat overstated."

We will submit this report to Ms. Ratcliff to enter into the DEIS record.

Sincerely,


Webb L. Smedley

Attachment

cc: Mike Madden



Review of Purple Line AA/Draft EIS

EnReview Consulting, LLC, has the pleasure of submitting this review of the Purple Line Alternatives Analysis/Draft Environmental Impact Statement (AA/Draft EIS). EnReview Consulting, LLC, provides transit planning and EIS processing to clients nationwide that are seeking FTA New Starts funding. EnReview Consulting provides specialty EIS process management aimed at expediting the environmental review process, meeting the ever-changing New Start and FTA requirements, providing quality documents, and putting the client at minimal risk for challenges by project opponents.

The Review for this project has been completed by Sharyn LaCombe and Maurice Carter. The firm's Principal, Ms. Sharyn LaCombe, AICP, is a NEPA (National Environmental Policy Act) Process Manager has been a leader on several EIS teams that have advanced into the next phase of FTA project development, have received full-funding agreements, and are either in construction or operational: including, Houston LRT, Newark Elizabeth Rail Link, the Charlotte South Corridor LRT, the Norfolk LRT project and the Cleveland Euclid Corridor BRT. Ms. LaCombe is a professional urban planner certified by the American Institute of Certified Planners and was previously employed by the City of Houston and Houston METRO, BRW (now owned by URS Corporation), and the Parsons Transportation Group before founding EnReview Consulting, LLC, in 2006.

Mr. Carter brings over 40 years of experience in transit planning, including serving as a former Technical Advisor for the Maryland Governor's Mass Transit Steering Committee and Project Engineer with the Maryland MTA. He has worked for a number of transit authorities during the feasibility, planning, and operations of many bus and rail operations in cities such as San Diego, Dallas, Sacramento, Dallas, Portland, Miami, San Jose, Saint Louis and Baltimore. He was a former Vice President with Parsons Transportation Group and operated his own transit consulting firm for over 12 years. He specializes in the alternatives analysis phase of project development and efficient transit operations for bus and rail programs.

Summary of Findings

The Purple Line Alternatives Analysis/Draft EIS circulated by the MTA on October 17, 2008 follows the Federal Transit Administration's (FTA) guidance for preparing such documents. All technical reports have also been completed using FTA Guidance and the President's Council on Environmental Quality Guidance for

preparing documents in accordance with the National Environmental Policy Act of 1969.

In general, the review finds that ***the benefits of the project are conservatively estimated while the costs and impacts of the project are based on a worst-case scenario and therefore somewhat overstated.*** The disclosure of data in this manner is a standard professional practice in preparing NEPA documentation and reduces the risk of potential legal challenges of such documentation.

Minor recommendations are made for subsequent phases of project development. Specific comments on the following reports are provided in the remainder of this memorandum:

- Review of AA/Draft EIS Scoping and Project Initiation Materials
- Review of AA/Draft EIS Methodology Reports
- Review of Alternatives Definition and Evaluation Report
- Review of AA/Draft EIS Document

Review of AA/Draft EIS Scoping and Project Initiation Materials

The Scoping Process and Project Initiation Materials were contained in the *Public Outreach Coordination Technical Report*. Appendix A of this technical report contains the Bi-County Transitway Scoping Process Report. This report was reviewed for consistency with the Federal Transit Administration (FTA) and the President's Council on Environmental Quality (CEQ) guidance on conducting scoping for the project. It was found to be consistent with U.S. Department of Transportation regulation as codified in the Code of Federal Regulations at 771 Part 123 and in the CEQ's Scoping Memorandum guidance. The following observations were made of the Scoping Process Report:

- scoping activities notices were well documented in the report (i.e. federal register notice, notices to interested and affected parties, agency coordination materials, outreach to non-English speaking communities, etc.). The required notification was provided to interested and affected parties within the corridor. Several opportunities were provided to obtain public input and the regulatory requirements for scoping activities were surpassed.
- alternatives to be studied in the EIS were announced to the public during scoping. The geographic scope of the study was identified as well as the modes to be included in the AA/EIS. Comments received during the Scoping process were documented and addressed. MTA was responsive to the comments obtained during the scoping process. Alternatives that

were not considered reasonable were documented as such and alternatives that deserved further study were added to the alternatives analysis.

- Environmental concerns raised during the scoping process were addressed in the AA/EIS. Specifically, security concerns were raised during scoping and were addressed in Section 6.4.13 of the Draft EIS.

Review of AA/Draft EIS Methodology Reports

A methodology report for the AA/Draft EIS was not prepared. Instead the methodologies were listed in each of the technical reports which accompanied the AA/DEIS. Documenting the methodologies for an EIS is a requirement that was codified with the passage of SAFETEA-LU. This project was initiated after SAFETEA-LU and therefore was not required to complete a methodology report. Specific comments on methodologies used in each technical report are identified below in Table 1.

Technical Report	Comments
Air Quality	EPA and USDOT methods were used to conduct the analysis. The project was found to be in conformity with the SIP and TIP. The technical analysis and the models used to conduct the analysis are the usual and customary methods.
Archaeology	The Area of Potential Effects was developed in coordination with MHT. A very conservative 250 feet swatch from centerline used for the APE to be refined upon selection of an LPA. While consulting parties are identified in the Draft EIS, the coordination with consulting parties was referenced to apply to cultural resources of which archaeology is. Specific outreach to archaeology consulting parties is not documented in Archaeology Technical Report or detailed in the AA/Draft EIS. The paragraph describing the consultation activities that is described in the Architectural History Technical Report should be added to the Archaeology Technical Report in order to document consultation with consulting parties was also conducted for archaeology.
Architectural History	Public Involvement activities identified cultural resources as a topic of discussion during scoping and open house meetings. Consulting parties and public outreach for compliance with Section 106 are described in this technical report. It might be useful to add public involvement notices and letters to consulting parties as an appendix to the Architectural History Technical Report. A conservative Area of Potential Effects of 500 feet was used. The technical report and the AA/DEIS does not yet include formal Determinations of Eligibility which is normal for this stage of project development and allowable under the Section 106 regulations. It is possible that some resources identified in these reports as potentially eligible are eliminated before PE/FEIS is complete due to building

	alterations, demolitions, or SHPO disagreement with the recommendations or eligibility. The data presented is sufficient for AA/DEIS planning activities and the comparison of impacts amongst alternatives as the worst case scenario is assumed.
Technical Report	Comments
Capital Costs	<p>FTA's Standard Cost Categories for cost estimating were used. Data was entered into a cost stream format so that the evaluation of the costs of various segments can be pulled out. Conservative contingencies were used to assess unknown conditions such as hazardous materials mitigation or disposal. Standard percentages for professional services were used. Local standard cost data was used to reflect market conditions. Contingencies seem appropriate for conceptual level design.</p> <p>Alternatives Analysis studies often include an order-of-magnitude cost estimate for project alternatives. The cost estimate technical report details the proposed cost of each alternative based on line item entries. The data presented goes beyond that normally required at this stage of project development. The level of detail that is provided in the several hundred pages of attachment far exceeds what is required for selecting between alternatives at the AA/EIS level. However, the FTA is becoming more demanding on capital cost detail as projects move closer to implementation in order to avoid unexpected costs above budgets that are used for decision making.</p> <p>A general comment that may be misleading is the category of "Contingency" explained in Section 4.1. A better term for the add-on amounts is "Design Allowance." It is money that by professional experience will be used within the estimate as design matures from the planning level to the preparation of design documents. It is not money that may be used for unidentified purposes such as adding an arts-in-transit program. The explanation is correct but some readers may get an incorrect impression of what the allowances will be used for.</p> <p>The reviewers are firm believers that, even at the planning</p>

	<p>level, there should be an Operating Plan Document. Without it, the application of capital cost (and operating cost) methodology must be applied using assumptions which aren't transparent and may rely too heavily on computer model output. However, within the context of selecting between alternatives there seems to be sufficient information from which conclusions may be drawn. A general observation is the features (cost categories) of rail alternatives have been defined more severely (higher resulting cost) than costs related to the bus options.</p>
Technical Report	Comments
Capital Costs (cont.)	<p>Section 4.2.6 provides an excellent discussion of how the many components of capital cost may be annualized to account for varying life cycles of the components. The classic example is the life of a bus at 12 years compared to a railcar with a life of, at least, 30 years. The net effect is the capital cost of buses needs to be multiplied by, at least, 2.5 compared to the cost of LRVs in order to gain capital cost equilibrium between the alternatives. However, the capital cost summary that is provided in Table 6-1 does not appear to have applied the annualization impact. If that is the case, the result is a display of costs, side-by-side, that may mislead the reader in thinking, for example, the money required to purchase buses is what is shown when, in fact, that cost is only good for the first 12 years.</p> <p>There are reservations after reviewing the information in Table 6-1. There does not appear to be information that would explain the BRT fleet ever being smaller than the LRT fleet (Railcars accommodate more people) and there does not appear to be an explanation for the railcar fleet staying unchanged (44 vehicles) for all three alternatives while the travel time decreases as the investment increases. That said, a quick review of the ridership estimate indicates the fleet can accommodate the demand. It is more difficult to determine how the fleet may change between the options since that information is driven by the network models. Again, the purpose of the comments is to alert readers that the LRT options relative to the BRT options may be being presented in a way that is</p>

	<p>not as favorable to the LRT options as it may actually be.</p> <p>The data for weather conditions listed on page 4-1 should be confirmed that the intent was that MD specific conditions were used in the cost assumptions.</p>
Energy	<p>Energy use for each Build Alternative was used by identified the direct BTU consumption for each alternative. This methodology is consistent with FTA procedures. The Technical report properly evaluates the direct and indirect impacts of the Build Alternatives.</p>

Technical Report	Comments
Geotechnical	Geotechnical investigations are usually limited to research of soil and subsurface conditions during an AA/EIS level document. Given the consideration of tunnel sections, geotechnical investigation, and specifically, geotechnical borings were taken near tunnel sections of the alternative alignments. These investigations provided greater accuracy with regards to the location of the tunnels, portal locations, and construction methods than is normally conducted at this phase of study. The work performed was thorough and helps to provide sufficient detail needed for the design of the alternatives so they could proper evaluated from a design and cost estimating stand point.
Hazardous Materials	An initial site assessment was performed and is the appropriate level of assessment for this phase of study. The data used is not more than three years old. A site reconnaissance was performed. Data presented is usual and customary for this level of environmental document.
Natural Resources	All technical areas have been properly addressed using the latest guidelines and regulations. Impacts have been overstated and counted for the alternative alignments but also the design options. This overstating of impacts is consistent with NEPA worst-case scenarios but this nuance may not be recognized by some readers. The relative impacts amongst alternatives are significantly different. Efforts to reduce impacts have been employed. Given the context of the corridor and the extent of natural resources, it is impressive that fewer impacts would not result from the project.
Noise and Vibration	The FTA Guidance for noise and vibration was used to conduct a general assessment as required. The impacts were properly assessed using this guidance. The assumptions in the analysis were conservative.

Technical Report	Comments
Operations and Maintenance	<p>Operating Costs seem unusually high for the light rail alternative. Intuitively, light rail should have some additional costs (labor is generally higher) but there should be some benefit by being able to carry more passengers in one trip since rail cars can be connected in 2 and 3 car configurations. In general, the operating costs for light rail seem disproportionately high in comparison to BRT.</p> <p>While the reviewers agrees that the MTA LRT system is the most appropriate to use for modeling the cost of the Purple Line, there are many anomalies in the recent data that appear to be yielding trend results that are in variance with what the writer believes are likely results. The report points to the difficulties of modeling using the years where LRT service was greatly curtailed for items like the double tracking work. Additionally, the cost allocation between modes that is performed by the MTA is subject to internal interpretations and requirements of the enabling legislation with respect to items such as farebox recovery for the bus services. The National Transit Database (NTD) now contains year 2006 information that may shed additional light on the cost models. It appears that the document preparer has assumed the most unfavorable cost conditions for the LRT alternatives relative to the bus alternatives. That is to say there can be reasonable confidence in the bus numbers but, in each instance, it appears the potential error within the LRT values is cumulative and unfavorable. While the full set of matrices isn't available to see the impact to specific cost elements, it appears that the LRT O&M cost is more that 10% greater that may be expected if the Purple Line were in operation in the fall of 2007.</p> <p>There is discussion regarding the relative increases in employee fringe costs between rail and bus employees at the MTA – about 160% and 37%, respectively. Labor cost is an extremely significant contributor to the model. Historically, senior staff elect to work rail service which would cause more cost for items such as vacation coverage but the variance between the numbers can only</p>

	<p>be attributed to bookkeeping and not to contract conditions. It's not clear if fringe adjustments were made to the cost estimates based on the summary data that was available for review. However, if an adjustment was made, it, too, may be compounding and causing LRT costs that are higher than what</p>
Technical Report	Comments
Operations and Maintenance (cont.)	<p>were expected.</p> <p>It is important to note that a comparison of the bus allocation modeling information doesn't indicate the anomalies found in the LRT data. The cost information which is presented is very important in terms of absolute values but it may be more important in a relative sense between the alternative modes. Therefore, an equal level of confidence is needed for bus and rail related costs. Even with the values presented, this reviewer finds the LRT options to be significantly more attractive than the bus options.</p>
Public Outreach	<p>Public Outreach for the project exceeded the requirements of NEPA and the preparation of EIS documents. Advertisements were far reaching and provided sufficient notice for attendees. Outreach materials were provided in Spanish and Chinese. Specific outreach activities were employed to identify and engage the transit dependent and environmental justice communities. Several rounds of public meetings/open houses were held throughout the study period. Individual coordination meetings were held with interested and affected parties throughout the corridor. The outreach efforts are sufficiently documented in the public outreach technical report.</p>
Section 4(f) Evaluation	<p>Section 4(f) Evaluation Technical Report used the appropriate definitions detailed in the regulations for identifying 4(f) uses. The identification of the Interim Georgetown trail for transportation purposes and its exclusion from 4(f) is properly identified and documented. The evaluation properly applies the de minimus finding for properties not adversely affected by the project. At this point, project impacts on 4(f) resources are conservatively stated. Fewer impacts resulting from the Build Alternative</p>

	are likely when the area of construction limits and “use” are narrowed.
Socio-Economic Conditions	Terminology for property acquisitions and displacements is not consistent with the Uniform Relocation Assistance and Real Property Acquisition Policies Act that governs the purchase of real estate for federal funded projects. The report identifies a displacement as a “taking”. As the property owners are going to be compensated for their property based on fair market value, it would not result in a “taking” which is a legal term that means a governmental body required private land to be used for public purpose without compensation. Secondly, leaseholders (business or residential) can also be “displaced” even though their personal
Socio-Economic Conditions (cont.)	land is not acquired for the project. All displaced persons (owners and renters) are eligible for relocation assistance under the program. The report does properly and most importantly equally assess the impacts of displaces, either renters or owners, so the results that are presented relative to the number of displacements is correctly identified.
Traffic	The traffic impact assessment used forecasted travel data from the regional council of governments. An appropriate traffic growth rate factor was used to forecast future No-Build/Build Conditions. The analysis considers conflicts to other modes of transportation and is a complete representation of projected impacts.
Travel Demand	<p>Ridership projections were forecasted using the methods set forth by the Federal Transit Administration. Consideration was given to BRAC changes in employment and population in the corridor. The ridership is conservatively forecast using the travel demand forecasting techniques and constants required by the FTA.</p> <p>It is the reviewers' opinion that the ridership of all modes is probably understated given the conservative methods and travel model techniques employed across the country. Several transit projects have opened in the last 5 years and have seen much higher ridership than initially forecasted. Examples include: Houston LRT, Minneapolis LRT and the Charlotte Light Rail. As an example, the Charlotte LRT forecasts for ridership were 17,900 for their 25-year planning horizon. Eight months after opening, the Charlotte</p>

	LRT ridership was 16,936 riders, just under the 25 year horizon with not even a year of revenue service in place.
Conceptual Plans	The conceptual plans were reviewed for consistency with the alternatives presented in the AA/DEIS and were found to be consistent. EnReview Consulting, LLC is a transportation/environmental planning firm and therefore is not qualified to assess the sufficiency of engineering plans and drawings.

Review of Definition of Alternatives Technical Report and Evaluation

The Definition of Alternatives systematically documents the alternatives development and definition process from the initial alternative identified in the scoping process to those presented the AA/Draft EIS. The document addresses and sets aside alternatives that are no longer in consideration. Alternatives were developed from a strong history of transportation/transit planning. The alternatives presented in the AA/Draft EIS are responsive to concerns raised throughout the AA process as documented in the public outreach technical report.

The documents have defined the transport need within the corridor consistent with adopted land use and transport plans. The alternatives considered have exceeded the detail requirements required to reach decisions by varying the bus and fixed guideway alternatives as compared to the base constrained adopted plan and the potential Transportation System Management (TSM).

Further, in response to the Town of Chevy Chase, the MTA has evaluated additional options for the Bus alternatives, using the Jones Bridge Road option, to directly serve the BRAC facilities based on base realignment plans. The results of the evaluation by the MTA appear to fairly treat the medical facilities as well as the other employment centers that would have the opportunity to use the Purple Line. It is the reviewers' opinion that, while the MTA has considered all potential users, the Town of Chevy Chase's consultant wishes to have a primary emphasis placed on the BRAC related facilities without considering the overall impacts to the Purple Line service area. A similar view is expressed in the Town's consultant's review regarding directionality of transferring passengers between the Purple Line and METRO. This is a very important point and it may be brought up again. There is always the possibility that, at the micro level, a specific element may be improved. If only that element is presented, it can have the impact of diverting attention to the larger picture. The big-picture result may be detrimental to the overall project. With any project of this magnitude there are going to be trade-offs. The Jones Bridge Road option does not appear to

warrant additional consideration beyond what is in the documents. Sufficient information is available to allow for a decision among the alternatives.

Conclusion: The documents have addressed reasonable alternatives for the corridor as a whole and matched the alternatives to its purpose and the transport need they are addressing. While further detail refinements will and should be considered as a project moves through subsequent planning and engineering phases, there is ample information available to use to select a project to pursue. Further, it appears that the MTA has taken proper care to address the specific concerns of the Town of Chevy Chase in a regional and corridor context and its findings fairly reflect the potential impact to the corridor conditions.

Review of AA/Draft EIS Document

The Purple Line Alternatives Analysis/Draft EIS circulated by the MTA on October 17, 2008 follows the Federal Transit Administration's (FTA) guidance for preparing such documents. All technical reports have also been completed using FTA Guidance and the President's Council on Environmental Quality Guidance for preparing documents in accordance with the National Environmental Policy Act of 1969.

Throughout the document, the regulations and procedures are described. The EIS has addressed all federal regulation changes in the AA/EIS document. Methods and techniques for assessing alternatives, identifying project corridor conditions, and assessing environmental impacts are consistent with FTA guidance for preparing Alternatives Analysis, FTA New Start Assessments and NEPA documentation at the EIS level in accordance with all required USDOT guidance and regulations. The EIS process was initiated prior to the implementation of SAFETEA-LU; therefore, the new environmental provisions are not required to be addressed in this EIS document.

In general, the review finds that the benefits of the project are conservatively estimated while the costs and impacts of the project are based on a worst-case scenario and therefore somewhat overstated. The disclosure of data in this manner is a standard professional practice in preparing NEPA documentation and reduces the risk of potential legal challenges of such documentation. It is important to caution that the general public and the news media might be overly concerned by project impacts than they should due to these conservative methods. There is recognition of this in the document and the explanation that the impacts of an alignment are summarized in their entirety including design options. The reviewers recommend future documents detail out

between the design options these impacts so that the impacts can be more accurately identified and less overstated. Additionally, the study areas for the review of the alternatives are conservatively wide due to the conceptual level of design of the current project phase. Assumptions related to the construction footprint beyond 10'-15' on each side of the outer edges of the construction limits also allows for an overstating of impacts. Once more detailed design is developed these limits can be narrowed and the site specific impacts of the alternatives can more readily be identified.

The consolidation of the east and west study segments into one document was a very well thought out consideration on behalf of the MTA so that the full impacts of the line could be assessed at one time and not segmented into individual analysis which could have understated the impacts in the entirety. This action could avoid environmental documentation challenges that critics may have tried to claim improper segmentation of the proposed project. The project as presented has logical termini at the METRO stations and connections to existing transit services. Given the full assessment of impacts from end to end, the selection of a minimal operating segment could be made without fear of properly assessing the impacts of the full proposal.

The document:

- details the purpose and need for the project in a clear and concise manner using supporting data derived from the transportation problem to be solved by a proposed investment;
- details the prior planning for transit in the corridor, the alternatives that have been studied, set aside and carried forward for further examination;
- identifies the traffic and transportation impacts associated with the No-Build, TSM, and Build alternatives;
- presents a worst-case scenario assessment of the potential short and long-term social, economic and environmental impacts; and,
- provides the evaluation framework, the FTA evaluation procedures and a technical evaluation assessment for each of the alternatives.

The AA/Draft EIS List of Preparers documents individuals well experienced in the transit industry and by personnel who are familiar with USDOT Regulations and most importantly, FTA guidance and procedures. The lead person on the PB America's Consulting Team for the MTA's consulting team is well respected for his expertise and it is evident in these documents. Further, the reviewers have worked directly with the lead person on the RKK engineering team and have the highest regard for his work as well as his vision of addressing what is required, in an engineering sense, to serve the identified travel needs.

The AA/Draft EIS has defined the transport need within the corridor consistent with adopted land use and transport plans. The alternatives considered have exceeded the detail requirements required to reach decisions by varying the bus and fixed guideway alternatives as compared to the base constrained adopted plan and the potential Transportation Management System (TSM).

Further, in response to the Town of Chevy Chase, the MTA has evaluated additional options for the Bus alternatives, using the Jones Bridge Road option, to directly serve the BRAC facilities based on base realignment plans. The results of the evaluation by the MTA appear to fairly treat the medical facilities as well as the other employment centers that would have the opportunity to use the Purple Line. It is this reviewer's opinion that, while the MTA has considered all potential users, the Town of Chevy Chase's consultant wishes to have a primary emphasis placed on the BRAC related facilities without considering the overall impacts to the Purple Line service area. A similar view is expressed in the Town's consultant's review regarding directionality of transferring passengers between the Purple Line and METRO. This is a very important point and it may be brought up again. There is always the possibility that, at the micro level, a specific element may be improved. If only that element is presented, it can have the impact of diverting attention to the larger picture. The big-picture result may be detrimental to the overall project. With any project of this magnitude there are going to be trade-offs. The Jones Bridge Road option does not appear to warrant additional consideration beyond what is in the documents. Sufficient information is available to allow for a decision among the alternatives.

The required public circulation for a Draft EIS is 45-days with a public hearing held sometime during that period. The MTA and FTA have doubled that period to allow for sufficient review of the document by the interested and affected parties and agencies with jurisdiction. Illustrating again how the MTA has exceeded federal requirements.

In conclusion, the documents have addressed reasonable alternatives for the corridor as a whole and matched the alternatives to its purpose and the transport need they are addressing. While further detail refinements will and should be considered as a project moves through subsequent planning and engineering phases, there is ample information available to use to select a Build Alternative to pursue. Further, it appears that the MTA has taken proper care to address the specific concerns of the Town of Chevy Chase in a regional and corridor context and its findings fairly reflect the potential impact to the corridor conditions. The full set of documents (technical reports and AA/DEIS) are very

complete and technically sound in terms of providing a clear picture of the project and its impacts to the communities and transport within the corridor.

Recommendations

The responsibility of the technical staff, in preparing solutions to the transport need, is to expend project capital resources that are required to solve the transport need in a safe and community conscious manner. It is the responsibility and prerogative of the community to add capital features to the project which may enhance the project to meet other community goals.

Where technically possible, consistent with overall community development plans, rail transit is best placed on the surface to be convenient to users and to become an integral part of the community. If it is not technically feasible to construct the line on the surface, the second choice would be to elevate sections to avoid technical problems. And, the least desirable choice is to place facilities in a subway. Transit is no different in this context than pedestrian facilities, auto facilities and recreational facilities. A classic comparison relates to pedestrians. The last choice would be to place pedestrians in a tunnel underpass.

An overall review of the documents suggests that the Medium LRT investment satisfies the need statement best although some features of the High LRT option may be added based on community preferences. The station at Fenton Street appears to be warranted in order to meet travel needs.

Capital expense may, sometimes, be avoided through operating considerations. For example, if noise levels are very near acceptable levels the noise may be brought into agreement with those levels by operating at a slower speed through the sensitive area.

During the next project phases, there should be a concerted effort made toward reducing items from the capital program that may be avoided as long as the impact to the system is minimal.

While it may cause additional work during the later project phases, it is permissible to carry minor alignments (horizontal and vertical) into the preliminary engineering phase where more information may be available for the technical staff and residents that will allow all to select options that will make the project the best it can be for the community.

Overall, the reviewers' would select the Medium LRT Option as the base condition to work from as the Preferred Alternative. The reasons are several:

- It is a very good project.
- While satisfying the project purpose, it more closely aligns to the reviewers' philosophy of the responsibility assigned to technical staff and a belief about what is best for the transit rider and the community as a whole.
- Any features that may be desirable from the viewpoint of the community may be identified with the recommendation that they be carried into the next phase of work.
- There are specific features of the project that are important to this reviewers that are recommended for future work phases:
 - Keep a station at Fenton Street. (Preferably an at-grade station.)
 - Keep the alignment along the trail. It is not only the best route to get to the west end of the project from Silver Spring but the uses are compatible and can be designed to be safe and pleasant.
 - Keep the alignment through the University of Maryland and, if possible, along Campus Drive. It's good for the university and its development plan and it is especially good for the students – on-campus residents and commuters.
 - Eliminate the added costs of tunneling under Sligo Park to reduce what are only minimal impacts and instead use some of those dollars towards mitigating the impact to the park.
- At least for the selected option, insist that an Operating Plan be prepared immediately after the Preferred Alternative is selected. The Operating Plan (to private industry it would be termed a business plan) needs to detail the project. It provides guidance to everyone – communities, designers, administrators, etc. – that explains what the project is to do and it allows for everyone to continually check assuring that design and construction work being done is consistent with the Operating Plan.
- While the cost information is sufficient for deciding on options, request that the capital and operating cost be updated for the selected option as soon as the Operating Plan is prepared. Until then, project operating and capital budgets should be considered as draft documents.
- Insist on value engineering that includes the community (consistent with the Operating Plan) for options that may be taken into the next work phase as well as options that may arise during future work. The technical team is required to perform value engineering. The community needs to be included. Try to remember this is the beginning of a project and it can always be made better as long as its original purpose and focus is retained.

Disclaimer

The review of this AA/Draft EIS document was completed based on the planning and environmental technical work presented. The review that was conducted



was not intended to provide a NEPA Legal Sufficiency Review. The review was also not conducted from an engineering perspective. Other expertise should be sought for those types of reviews.

PURPLE LINE PETITION

www.purplelinenow.com

I enthusiastically support the Inner Purple Line

1. A generally at-grade light rail line that is primarily on its own right of way;
2. Excellent service linking the Bethesda, Silver Spring, College Park and New Carrollton Metrorail Stations with stops in other communities along the transit corridor;
3. Completion of the Capital Crescent hiker-biker trail alongside the transit line on the Georgetown Branch railroad right of way between Bethesda and Silver Spring and important pedestrian safety upgrades elsewhere along the project corridor;
4. A community- and environmentally-friendly design that mitigates negative impacts in a cost-effective manner.

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PURPLE LINE PETITION

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From
Tom

I enthusiastically support the Inner Purple Line

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4. A community- and environmentally-friendly design that mitigates negative impacts in a cost-effective manner.

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PURPLE LINE PETITION

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I enthusiastically support the Inner Purple Line

1. A generally at-grade light rail line that is primarily on its own right of way;
2. Excellent service linking the Bethesda, Silver Spring, College Park and New Carrollton Metrorail Stations with stops in other communities along the transit corridor;
3. Completion of the Capital Crescent hiker-biker trail alongside the transit line on the Georgetown Branch railroad right of way between Bethesda and Silver Spring and important pedestrian safety upgrades elsewhere along the project corridor;
4. A community- and environmentally-friendly design that mitigates negative impacts in a cost-effective manner.

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PURPLE LINE PETITION

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I enthusiastically support the Inner Purple Line

1. A generally at-grade light rail line that is primarily on its own right of way;
2. Excellent service linking the Bethesda, Silver Spring, College Park and New Carrollton Metrorail Stations with stops in other communities along the transit corridor;
3. Completion of the Capital Crescent hiker-biker trail alongside the transit line on the Georgetown Branch railroad right of way between Bethesda and Silver Spring and important pedestrian safety upgrades elsewhere along the project corridor;
4. A community- and environmentally-friendly design that mitigates negative impacts in a cost-effective manner.

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PURPLE LINE PETITION

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I enthusiastically support the Inner Purple Line and add my name to this petition. I support this vision of an Inner Purple Line:

1. A generally at-grade light rail line that is primarily on its own right of way;
2. Excellent service linking the Bethesda, Silver Spring, College Park and New Carrollton Metrorail Stations with stops in Chevy Chase, Long Branch, Langley Park, the University of Maryland (on campus), Riverdale Park and other communities along the transit corridor;
3. Completion of the Capital Crescent hiker-biker trail alongside the transit line on the Georgetown Branch railroad right of way between Bethesda and Silver Spring and important pedestrian safety upgrades elsewhere along the project corridor;
4. A community- and environmentally-friendly design that mitigates negative impacts in a cost-effective manner without impeding the speedy implementation of this project.

[illegible]

PURPLE LINE PETITION

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4. A community- and environmentally-friendly design that mitigates negative impacts in a cost-effective manner.

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- RECORD #1165 DETAIL

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Submission Content/Notes : My name is Harry Sanders, H-A-R-R-Y, S-A-N-D-E-R-S.

I am President of Purple Line Now. My transit advocacy started in College Park over years ago working to ensure a Metro green line. But we always say, miss the campus in those days.

I strongly favor a cost effective combination of the medium and high level LRT options presented in DEIS, including a hiker/biker trail through the Bethesda tunnel.

I support the purple line crossing the University campus because the trains are quiet and pollution free and will provide direct service to this great institution.

I cannot support the same option for huge buses passing at much greater frequency. I urge the students and the University administration to make clear their opposition to BRT given that this bus option is being pushed by a well funded effort based in Chevy Chase and a country club. Why I support LRT. First, ridership and travel times are better for LRT. Many speakers have talked about that. What is more dramatic is that travel time differences between key points along the line, including Bethesda, Silver Spring and College Park, campus.

For example, the medium cost option takes 49 minutes to go from College Park to Bethesda, while the medium rail option takes minutes, a 15 minute difference. One auto owner is going to ride a bus for 49 minutes.

The vehicle capacity of BRT is lower than LRT. The DIS references the use of larger buses seating up to 60 passengers, but the study assumes an average up to 110 passengers per bus.

This may be feasible, but it does not, but it means an average of up to 50 standees per bus. This is not attractive to transit riders who do not like to stand on buses.

And also it impacts the frequency in number of buses needed. The DIS travel forecast need at 6-minute headways (inaudible) to move nearly 1,900 bus passengers per hour.

But because this overloads the buses, seven - buses per hour are added, making the headway actually closer to a bus every four minutes.

The actual capacity is used of 100 passengers is really a bus every three minutes. This would result in a higher operating cost than projected, and the buses will catch up to each other in traffic lights resulting in unreliable operations.

Finally, the Baltimore LRT is not a good model for LRT cost. It has much less ridership than the purple line. There are better models out there.

In conclusion, as a result of these three issues and many others, I feel light rail costs are over-estimated. Let us not be penny wise and pound foolish. Build light rail now.

- RECORD #1337 DETAIL

First Name : Webb
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State : MD
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Email Address :

Submission Content/Notes : Good evening. My name is spelled W-E-B-B, last name S-M-E-D-L-E-Y. And I'm speaking tonight on behalf of Purple Line Now. Purple Line Now is a coalition of civic, environmental labor business and municipalities in both Montgomery and Prince George's counties. I'm also the president of the Woodside Civic Association, which represents home owners along the route of the Purple Line in Silver Spring in the Woodside community.

We strongly support the light rail Purple Line alongside a completed Capitol Crescent Trail. BRT is not appropriate for the Purple Line. There are no busways in the United States that carry 68 thousand riders per day. We are concerned that the DEIS overstates the operation and maintenance cost per, for the rail option while understating them for the bus option. This should be corrected in the following ENVIRONMENTAL IMPACT STATEMENT.

A light rail line integrated with our Metro rail system will attract many more riders, have a far more positive community impact, provide a transit capacity for the long-term and be more compatible with the Capitol Crescent and other hiker/biker trails. The DEIS demonstrates clearly that doing nothing is not an option. I am a Silver Spring to College Park commuter who witnesses the growing need for the Purple Line on a daily basis. East-west transportation is reaching a break down point.

I moved to Silver Spring more than 20 years ago with a job in D.C. and a pleasant Metro rail commute. I began working in College Park 12 years ago and the J4 Express buses are stopped in the same traffic as everyone else. When it rains, many drivers simply avoid the beltway, including myself, so back ups on other roads quickly grow.

If the Purple Line is not built, families, businesses, and communities will increasingly suffer as delays shift traffic onto neighborhood streets.

I want to echo Ana Sol-Gutierrez' remarks regarding the Washington area bicyclists association support for rail and trail. Under the medium LRT option, completion of the Capitol Crescent Trail between Bethesda and Silver Spring will include 6 safe crossings of roads and rail lines along the way. I became active in this effort when my young son was nearly killed before my eyes trying to cross 16th Street on the Interim Capitol Crescent Trail. That was nearly 20 years ago.

The Interim Trail remains unsafe today. We look forward to completion of a safe trail running alongside quiet light rail line and urge the governor to move this project into preliminary engineering as quickly as possible.

- RECORD #2422 DETAIL

First Name : Webb
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Submission Content/Notes : Re: AA/DEIS for the Purple Line

Please enter the attached Washington Post editorial endorsing the Light Rail Transit option for the Purple Line into the public record for the project.

Sincerely,

Webb Smedley, Chair
Purple Line NOW!
8704 Second Avenue
Silver Spring, MD 20910

Washington Post January 4, 2008

Forward, Purple Line
Maryland officials should unite behind light rail.

The Washington Post editorial
Sunday, January 4, 2009

Since 1986, the Soviet Union has collapsed, two Bushes have been elected to the White House and exactly zero miles of the Purple Line have been constructed in Maryland. For backers of the project, under consideration since that year, it might seem as if it's easier to topple a communist empire than to get 16 miles of transit line built. But -- and we say this with considerable caution -- it seems as if the obstacles that have held up the project are receding and the line, which would connect Bethesda in Montgomery County to New Carrollton in Prince George's County, is closer to becoming a reality.

Recent developments encourage our optimism. In October, a key report found that there are multiple Purple Line routes that would meet federal funding standards while having a relatively minimal impact on the environment. The six-year state study, known as a Draft Environmental Impact Statement, found that bus rapid transit would be cheaper but that light rail would have better ridership numbers and quicker travel time.

Last month, Montgomery County planners endorsed light rail. They found that light rail, which could cost as much as \$1.6 billion, is more cost-effective in the long term and has a greater capacity to handle ridership. They recommended that light rail run along the Georgetown Branch Trail in Silver Spring and Chevy Chase, a path popular with walkers and cyclists. The Planning Board will send a final recommendation to the County Council in coming weeks.

The surge of support for light rail has riled opponents of the route, who contend that rail would disrupt the trail and bring blight to their neighborhoods. They argue that bus transit is a less intrusive option that is more likely to be funded by the federal government. But few projects are as attractive to federal funders as the Purple Line, which would ferry thousands of federal workers and has one of the highest ridership estimates of proposed transit projects in the country.

It's become evident at recent public hearings that community support is

coalescing around light rail. The onus is on Montgomery officials and state leaders to support the route. The County Council, which will vote to recommend a route late this month, is expected to overwhelmingly support light rail. The vote is important, as is the intensity with which county leaders lobby state officials behind closed doors. Gov. Martin O'Malley (D) is expected to choose a final route and to start seeking federal funding this year.

If the project is delayed further, it won't be because of a lack of planning or public support -- it will be because of a failure of political leadership. Maryland officials must resist the relentless lobbying of light-rail critics and unite behind the route to present the strongest case for federal funding. Two decades of dithering is long enough.

##

- RECORD #2699 DETAIL

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8704 Second Avenue
Silver Spring, MD., 20910

January 13, 2009

Ms. Diane Ratcliff, Director
MTA Department of Planning

Via e-mail

Re: Comments in Support of the Medium Light Rail Transit Alternative for the Purple Line

Dear Ms. Ratcliff:

Last month marked a major milestone in progress towards completion of the light rail Purple Line connecting inner suburban communities in Montgomery and Prince George's Counties. Hundreds of individuals came out in support of the light rail transit option at four hearings. Editorial support was provided by the Gazette and Washington Post. Prince George's County locked arms in support of the project, with the Council and County Executive joined by uniform support on the part of the Prince George's County delegation and among municipalities such as College Park, Riverdale Park, Hyattsville, Greenbelt and Edmonston - who reject the idea that transportation priorities should be dictated by golf clubs or exclusive communities of wealth and privilege.

We applaud the Montgomery County Planning Board's staff for taking the first step toward the affirmation of Montgomery County's position in support of the Light Rail Transit option for the Purple Line and hope the Montgomery County Board will support most of the conclusions of the staff report on 1/15/09.

Most important in this Planning Board review is the long history of support for the light rail Purple Line on approved master plans in Montgomery County. As noted in the staff report: "*Vision staff note that, of the proposed BRT and LRT Purple Line alternatives in the DEIS, only the LRT alternatives conform to the approved and adopted Master Plans. In addition, the DEIS reviewed other alternatives including a Transportation System Management (TSM) option, and a No Build alternative which were not in conformance with approved and adopted Master Plans.*"

We support the following recommendations and observations made by the Planning Board staff:

- That light rail, and not bus rapid transit, can carry the heavy passenger loads foreseen for the Purple Line beyond the 2015 time frame.
- That the project should make use of the Georgetown Branch alignment between Bethesda and Silver Spring;
- That the hiker-biker trail between Bethesda and Silver Spring should be completed as part of the project, including parallel routes in Bethesda through the Air Rights Tunnel and on Bethesda and Willow Avenues, and along an off-road corridor along the CSX right of way into the Transit Center in Silver Spring; We agree with our allies in the Washington Area Bicyclist Association (WABA) that

this trail, alongside rail lines for most of its length, will be hugely popular and that planners should therefore aim for a 12 ft trail width (with two 2 ft shoulders) wherever feasible;

- That the project should include a stop serving Downtown Silver Spring and the Fenton Village area integrated with the new Silver Spring library. We do not believe the Board should recommend study of any tunnels through East Silver Spring if this requires sacrifice of a Fenton Street stop for the Purple Line.

The Purpose and need for the Purple Line was clearly stated: ***“Faster, more direct and more reliable east west transit service in the Purple Line corridor which would connect the four major activity centers”***

The No Build and Transportation Systems Management options do not meet this purpose and need. They will not be faster or more direct.

The Jones Bridge Rd option also does not meet the Purpose and Need – it is not a faster and more direct connection of our two major centers – Bethesda and Silver Spring.

Doing nothing is not an option because, the DEIS shows, trips within the corridor expected to increase by 43% by 2030. If we do nothing, the pain will extend to all – families, communities and businesses. Instead of preparing a new and greener economy, we will set the stage for prolonged stagnation.

Purple Line *NOW!* has always been careful to support MDOT’s position that Maryland should move forward with the study of three transit projects, all of which are important to the smart-growth future of our state. Lately, there has been much discussion about whether Montgomery County can afford the Purple Line. But we wonder, based on the data, why the Baltimore region should get a new rail line and Montgomery County settle for more buses. The rail options for the Purple Line demonstrate ridership levels of about 68,000 trips per day in 2030. That is higher than any BRT lines and most existing and proposed Light Rail lines in the U.S. The proposed Baltimore Red Line shows 41,000 trips for 2030 WITH A LONG TUNNEL. Without that expensive tunnel, the ridership is projected to be half that of the Purple Line - 34,000 - for this 14 mile line.

The Town of Chevy Chase continues to suggest that BRAC should cause a rethinking of the Purple Line. But BRAC will increase jobs in the Medical Center area by 2,200 to 2,500 jobs; this is a small portion of the overall jobs in the Bethesda CBD. – projected to grow by 20% between 2000 and 2030.

Housing growth in the Medical Center area is projected to grow minimally, while that in downtown Bethesda is projected to nearly double from 2000 to 2030, as is shown on Table 1-5 of the DEIS.

Silver Spring embraces the Purple Line, because 24% of its households have no car as is shown on Table 1-4 of the DEIS. It is a transit-supportive community that is clearly ready to shift more trips from bus to rail. There are already 100 buses entering downtown Silver Spring every rush hour, creating noise and localized air pollution that is not created by Light Rail. Even in Bethesda, 18% of the households are without a car and these people want better transit too.

Daily reduction in auto trips for the region 11,400 to 20,500 for build options and this translates into more livable communities for our transit oriented citizens.

Opponents of the Purple Line have suggested that the light rail project is not green enough, but the light rail Purple Line has been endorsed by 21 major planning and environmental advocacy organizations in our region including the Chesapeake Bay Foundation, Sierra Club, Coalition for Smart Growth, 1,000 Friends of Maryland, Chesapeake Climate Action Network and others (see:

http://www.purplelinenow.com/published/how_you_can_help/supporter_list.html for the entire list).

Now some of these opponents, who previously argued for expensive tunnels or a \$7 billion outer Purple Line say we should instead do a discount bus line – avoiding the Town of Chevy Chase, or do nothing at all.

We have a tremendous opportunity to move this project forward. On a daily basis, the news is replete with references to plans for the new Obama administration to promote green infrastructure.

We urge you to prioritize funding for Preliminary Engineering of the Light Rail Purple Line. Let us not waiver at this critical time.

Sincerely,



Webb Smedley

- RECORD #1345 DETAIL

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Submission Content/Notes : Maureen Jais-Mick, M-A-U-R, double E, N, Jais-Mick, J-A-I-S, hyphen, M-I-C-K. I represent Rethinking the Purple Line, a coalition of citizens in 18 Maryland communities interested in Purple Line alternatives that 1) serve the most people in jobs, 2) are the most affordable, and 3) preserve the Capitol Crescent Trail as a natural and safe green space. Of the alignments covered by the ENVIRONMENTAL IMPACT STATEMENT, we support the Jones Bridge Road Alignment.

In 1989, when Governor Schaefer offered Montgomery County 70 million dollars to build a cute, little single track trolley on the Capitol Crescent Trail, none of us could imagine 20 years later the transfer of Walter Reed services to the Bethesda Naval Medical Center and how that would drastically change our public transportation needs.

Bus rapid transit along Jones Bridge Road will serve more people and jobs. As reported by Sam Swartz Engineering, the JONES BRIDGE ROAD alignment currently serves more than twice as many jobs as the trail alignment and employment in this area is expected to grow 19 percent by 2030, compared with 16 percent job growth along the trail alignment. Those of us who live or work near the Naval Medical Center are concerned about congestion and taking cars off the road. As many people have mentioned, this is not a priority of the Purple Line.

Number two, bus rapid transit is more affordable. The Environmental Impact Study offers light rail and bus rapid transit alternatives. Light rail is not only more than twice as expensive as bus rapid transit to build, it is more expensive to maintain. And in some cities, actually Portland, Oregon, is one example, it has actually reduced the percentage of people using public transportation because of the high fares.

The Environmental Impact Study is vague about fares. The Purple Line transfers to Metro will initially be free. In Maricopa County, Arizona, whose light rail service hasn't even opened its doors yet, the light rail fares are now being substantially raised to cover costs. The increases are projected to decrease passenger boardings by 28 million people over three years, especially those in low-income communities.

In St. Louis, fares cover only 28.2 percent of operating costs, in Baltimore, 19.4 percent, and in Buffalo, 21.4 percent. It is irresponsible to pay 100 million dollars a mile for a light rail system when we can't meet our contractual obligations to our teachers and other county employees. And it would be irresponsible to spend a hundred million dollars per mile for a system that would need a huge subsidy forever even if we were flush with cash.

Number three, preserve the Capitol Crescent Trail as a natural and safe green space. Along with Smart Growth, we also need to be smart about growing and saving our green spaces. On November 14th, Governor O'Malley unveiled Maryland Smart, Green and Growing.

At the ceremony, John Griffin, the Secretary of the Department of Natural Resources pointed out that quote, forests are the regions most strategically important natural resources. We agree. The ENVIRONMENTAL IMPACT STATEMENT minimizes that 17 acres of trees will be bulldozed to make way for a light rail or a bus rapid transit route on the trail.

Most disturbingly, the statement makes it clear that funding for construction and maintenance of a trail alongside a transway is not secure. Each week, 10,000 pedestrians and bikers use the Georgetown Branch of the Capitol Crescent Trail for recreation and commuting. We don't want to push our strollers next to trains that run every three

minutes. We don't want to exercise on a tree-less path that is miserably hot in summer. We don't want our kids and their kids to bicycle where there used to be trees that cleaned our air, protected our water quality, eliminated storm-run and run off and provided habitat for wildlife. What we want is a better Purple Line. Thank you.

- RECORD #2227 DETAIL

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Submission Content/Notes :	
Attachments :	Wrtn Tstmny. M. Jais-Mick.pdf (2 mb)

Purple Line DEIS Testimony

My name is Maureen Jais-Mick. I represent *Rethinking the Purple Line*, a coalition of citizens in 18 Maryland communities interested in Purple Line alternatives that (1) serve the most people and jobs, (2) affordable, and (3) preserve the Capital Crescent Trail as a natural and safe green space.

(1) Serve the most people and jobs – Bus Rapid Transit will serve more people and jobs.

Of the alignments covered by the EIS, we support the **Jones Bridge Road Alignment**. In 1989, when Governor Schaefer offered Montgomery County \$70 million to build a cute little single track trolley on the Capital Crescent Trail, none of us could have imagined that 20 years later the transfer of Walter Reed services to the Bethesda Naval Medical Center would drastically change our public transportation needs.

Bus Rapid Transit along Jones Bridge Road (JBR) will serve more people and jobs. As reported by Sam Schwartz Engineering, “The JBR alignment currently serves more than twice as many jobs as the CCT alignment and employment in this area is expected to grow 19% by 2030, compared with 16% job growth along the CCT alignment.”¹ Those of us who live or work near the Naval Medical Center are concerned about **congestion**. Unfortunately, this is not a priority of the Purple Line, which aims simply to decrease travel times from east to west.²

(2) Affordable – Bus Rapid Transit is more affordable

The Environmental Impact Study (EIS) offers light rail and bus rapid transit alternatives. Light rail is not only more than twice as expensive as bus rapid transit to build, it is more expensive to maintain, and in some cities – Portland OR is one example – it has **reduced** the percentage of people using public transportation, due to its high fares.³

The EIS (page 2-31) is vague about **fares** – Purple Line transfers to Metro will “initially be free,” but then what? In Maricopa County AZ, whose light rail service hasn’t even begun, both bus and light rail fares are being substantially raised to cover costs. The increases are projected to decrease passenger boardings by 28 million people over three years.⁴

In St. Louis, fares cover only 28.2 percent of operating costs; in Baltimore 19.4 percent; and in Buffalo 21.4 percent. **Taxpayers pay the rest - forever**. It is irresponsible to pay \$100 million per mile for a light rail system when we can’t meet our contractual obligations to our teachers and other County employees. Even if times were great, it would be **irresponsible** to spend \$100 per mile for a system that will need a subsidy forever.

¹ “Analysis of MTA Purple Line Alternatives and Alignments,” Sam Schwartz Engineering, April 23, 2008, page 13.

² It appears that the Purple Line would primarily serve as a feeder to existing Metro stations for a continuation of north/south travel. This function could be better and much more cheaply achieved by improving existing bus service or upgrading to bus rapid transit.

³ Randal O’Toole, “Debunking Portland – The City That Doesn’t Work,” in *Policy Analysis*, July 9, 2007, page 5.

⁴ AZCenter.com

(3) Preserve the Capital Crescent Trail as a natural and safe green space.

Each week, 10,000 pedestrians and bikers use the Georgetown Branch of the Capital Crescent Trail for recreation and commuting.

Along with “smart growth” we also need to be smarter about growing and saving our green spaces. On November 14th, Governor O’Malley unveiled *Maryland: Smart, Green & Growing*. At the ceremony, John Griffin, Secretary of the Department of Natural Resources, pointed out that “Forests are the region’s most strategically important natural resources.”⁵ We agree.

The EIS minimizes the fact that 17 acres of trees⁶ will be gone forever to make way for a light rail or a bus rapid transit route on the Trail. Most disturbingly, the EIS makes it clear that funding for construction and maintenance of a trail alongside a transitway is not secure.

We don’t want to push our strollers next to trains that run every three minutes. We don’t want to exercise on a tree-less path that is miserably hot in the summer. We don’t want our kids and their kids to bicycle where there used to be trees that cleaned our air, protected our water quality, eliminated storm water runoff, and provided habitat for wildlife.

What we want is a better Purple Line.

Thank you.

Maureen Jais-Mick
7017 Exfair Road
Bethesda MD 20814
jaismick1@verizon.net
Edgemoor Neighborhood (west Bethesda)

⁵ “Governor O’Malley Announces Smart, Green & Growing Initiative,” Press release issued by Shaun Adamec and Christine Hansen in Governor O’Malley’s office.

⁶ Figure from American Forests.

- RECORD #101 DETAIL

First Name : Marty
Last Name : Newman
Business Name : RRC Community Association, Inc.
Address : 5826 Quintana Street
City : Riverdale
State : MD
Zip Code : 20737
Email Address : martybill@verizon.net
Submission Content/Notes : Has the Purple Line project been placed on hold due to the state's budget issues?

- RECORD #505 DETAIL

First Name :	Pam
Last Name :	Browning
Business Name :	
Address :	4317 Elm Street
City :	Chevy Chase
State :	MD
Zip Code :	20815
Email Address :	PBROW@VERIZON.NET

Submission Content/Notes : Dear Governor Martin O'Malley,
MTA Planning Director Diane Ratcliff,
County Executive Isiah Leggett,
Chairman Royce Hanson,
Council President Mike Knapp,

As the organizer of the Petition to Save the Capital Crescent Trail, I received a copy of the email from Mr. Shah, below, that was sent to you earlier today. I do not know this individual, and the views expressed in the first paragraph of his email are repugnant to me. I have spent my entire professional life working on behalf of social justice and environmental causes. And I believe that most, if not all, of the thousands of hikers and bikers who love the Capital Crescent Trail as I do, are respectful of people everywhere -- including those in Prince Georges County.

Mr. Shah has taken a sample letter from my Petition website (which I encourage you to visit) and twisted the first paragraph in a way that has nothing to do with the Save the Trail effort.

I suspect that this email sender may be a provocateur, attempting to tarnish efforts to preserve the Capital Crescent Trail. I have heard so much about this kind of ugly behavior in just the last few days in the news and in blogs, that I have to wonder if this is an orchestrated effort.

Never in my experience of talking to thousands of Trail users have I heard these views expressed. Nor have I heard these views from residents of Bethesda-Chevy Chase in the 21 years that I have lived here.

I would hope that you would disregard Mr. Shah's email and its association with our cause to preserve the beautiful tree lined greenspace and Trail between Bethesda and Silver Spring.

Thank you very much.

Very Sincerely,

Pam Browning, Organizer
Petition to Save the Trail
<http://www.savethetrailpetition.org/>
4317 Elm Street
Chevy Chase, MD 20815
301-654-0183

Jigar Shah wrote:

Dear: Governor Martin O'Malley,

MTA Planning Director Diane Ratcliff

County Executive Isiah Leggett,

Chairman Royce Hanson,

Council President Mike Knapp,

I am a Trail user. There is no need for PG county public in nice areas of Bethesda and Chevy Chase! It will devalue the houses and make the whole area unsightly and ugly & more crime. Underground train would

be more expensive. A bus would do just fine. Lets save money and have a bus instead of an underground or above ground train system. Montgomery county doesn't need to be blended with PG county.

More than 10,000 hikers and bikers use the Capital Crescent Trail between Bethesda and Silver Spring every week. By the year 2030 (the year for which MTA's Purple Line Ridership estimates are projected), all of our Trails will be dangerously overcrowded.

Currently, Trail users of all ages walk and bike on the Trail. It will not be safe to have high speed bikers, dog walkers, families with small children, and the elderly, strolling and biking, passing in two directions, within a 10' wide sidewalk, about 10' from trains passing by every three minutes.

I urge you to build the Purple Line somewhere other than along the Capital Crescent Trail.

All of the beautiful trees that currently shade the Trail would be bulldozed -- to level the narrow berm that the Trail runs on now -- in order to squeeze in the two sets of tracks for a Purple Line.

I, along with thousands of other Trail users, would be distressed to see this natural Trail degraded and the surrounding mature forest destroyed for a Purple Line.

I urge you to seek transit solutions that preserve our quality of life and protect our valuable environmental resources – including our mature trees and natural trails – by putting the Purple Line either underground or in another location.

Thank you for your consideration.

Sincerely,

Jigar Shah
10003 Vanderbilt Cir
Rockville, MD 20850

- RECORD #2084 DETAIL

First Name :	Merle
Last Name :	Cuttitta
Business Name :	SEIU Local 500
Address :	901 Russell Avenue
City :	Gaithersburg
State :	MD
Zip Code :	20879
Email Address :	LICHTERJ@SEIU500.ORG

Submission Content/Notes : Dear Elected Official,

Thank you for your support for the Purple Line. As you know, this environmentally friendly mass transit project has broad support from both Prince George's and Montgomery County's workforce and is critical to our future quality of life. The members of SEIU Local 500 are writing to request that you continue doing everything in your power to get a light rail Purple Line funded and built without delay.

Now that the U.S. Department of Transportation has reviewed Maryland's application for federal funds and the Maryland Transit Administration is conducting public hearings on the draft environmental impact statement, it is critical that your support for a light rail Purple Line be part of the State's record.

SEIU Local 500 represents 16,000 workers in Maryland and 18,000 workers throughout the metropolitan region. Our members would directly benefit from the Purple Line by both shorter commutes and the creation of new jobs and economic development along the proposed route. Transportation experts estimate that 35,000 new jobs are created for every \$1 billion invested in transit.

We represent working people, and like the rest of the labor movement we know that the Purple Line will be a great asset for our members, all working families, and communities of color. For too long, the primarily African-American and Latino workers of Montgomery and Prince George's County have taken multiple buses to access the job centers in College Park, Silver Spring, Rockville, and Bethesda.

A light rail Purple Line will not only encourage economic growth by linking the regions' major job centers, but will greatly reduce travel times and provide transportation equity by offering the working-class and service workers the same type of transit options long available to many areas of Prince George's and Montgomery County.

Again, we strongly urge you to support a light rail Purple Line to improve the lives of our members today and into the future. As the project moves into this critical phase, please do everything in your power to ensure that the project wins federal funding and is built without delay.

Respectfully,

Merle Cuttitta

Attachments :

Local 500 Purple Line Support Letter.pdf (89 kb)



Dear Elected Official,

Thank you for your support for the Purple Line. As you know, this environmentally friendly mass transit project has broad support from both Prince George's and Montgomery County's workforce and is critical to our future quality of life. The members of SEIU Local 500 are writing to request that you continue doing everything in your power to get a light rail Purple Line funded and built without delay.

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Again, we strongly urge you to support *a light rail Purple Line* to improve the lives of our members today and into the future. As the project moves into this critical phase, please do everything in your power to ensure that the project wins federal funding and is built without delay.

Respectfully,

Merle Cuttitta

MERLE A. CUTTITTA
President

BETTY MONTGOMERY
Executive Vice President

RUTH MUSICANTE
Treasurer

LYNNET ANDERSON
Secretary

LINDA B. GRAY
Trustee

PIERANGELI MORRISON
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901 Russell Avenue
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- RECORD #732 DETAIL

First Name : Mark
Last Name : Gabriele

Business Name :

Address :

City :

State : MD

Zip Code :

Email Address : GABRIELE@MAC.COM

Submission Content/Notes : Dear Ms. Ratliff,

Attached, please find a .pdf file which contains written comments regarding the AA/DEIS for the proposed Purple Line. These comments are submitted on behalf of the Seven Oaks / Evanswood Citizens' Association, a Montgomery County-Chartered civic organization for which I serve as President.

Should you have any questions or require any clarification, please feel free to contact me.

Attachments : SOECA COMMENTS ON PURPLE LINE.pdf (62 kb)

WRITTEN COMMENTS ON PURPLE LINE AA/DEIS – SUBMITTED BY SEVEN OAKS-EVANSWOOD CITIZENS ASSOCIATION (SOECA), MARK GABRIELE, PRESIDENT – ISSUES RELATING TO THE ROUTING THROUGH DOWNTOWN SILVER SPRING AND ON WAYNE AVENUE

Ms. Diane Ratliff
Director of Planning
Maryland Transit Administration

I am submitting these written comments to be included in the record of the review of the Purple Line Alternatives Analysis/Draft Environmental Impact Statement.

I am Mark Gabriele; I reside at 831 Woodside Parkway, Silver Spring, Maryland 20910, and I am the President of Seven Oaks-Evanswood Citizens' Association (SOECA), which represents approximately 700 households directly to the northeast of the Silver Spring Central Business District, including a number of neighborhoods on Wayne Avenue and on both sides of Wayne, Dale Drive, and Sligo Creek Park as far west as Colesville Road.

The overwhelming majority of SOECA has asked MTA to route the Purple Line under a half mile of Wayne Avenue so as to connect with a tunnel under the downtown that MTA has studied but does not favor. The community believes that whether the Purple Line is light rail or bus rapid transit, tunneling under Wayne Avenue and downtown Silver Spring is necessary to improve the overall efficiency of the Purple Line and make it a more appealing transit option through Silver Spring, while avoiding increased traffic congestion in the downtown and significant adverse impacts to the adjacent neighborhoods to the east of the downtown. Our community welcomes the Purple Line, but insists that it be tunneled, such as has been the case for Metro through all neighborhoods in the District of Columbia where Metro does not run on a railroad right of way.

According to MTA data, the length of the downtown portion of the tunnel – from the Silver Spring Transit Center to Wayne Avenue – would be 4,350 feet, or just more than four-fifths of a mile. According to MTA, the length of a tunnel under Wayne from Cedar Street to Mansfield Road (emerging prior to Sligo Creek Parkway) would be an additional 2,575 feet, or just under half a mile. The total tunnel segment from the Silver Spring Transit Center to Mansfield Road would be 6,925 feet, or 1.3 miles.

This segment of the Purple Line in Silver Spring, if run at surface, is likely to be the slowest, most inefficient, and traffic-jamming segment of the 16 miles.

The surface route that the MTA has proposed on Wayne Avenue will bisect the community and will run on what will be the only essentially residential road in the entire 16 miles of the project, even if it also functions as an “arterial” road into the business center. Virtually all other segments of the Purple Line will be on current or former railroad rights of way or on wide boulevards. Moreover, MTA’s widening of nearly two-thirds of the just more than one mile on Wayne on which the surface route would run – primarily for long left-turn lanes at signaled intersections – will increase the traffic capacity on Wayne, and eventually traffic will grow to fill

it. The widening on Wayne will be combined with slow-moving lanes that are shared by Purple Line vehicles and cars. Ironically, traffic will increase, not decrease, on Wayne as a result of the Purple Line. Furthermore, prior to the Purple Line, the County had approved plans to effectively narrow Wayne Avenue by replacing a lane with what was to be the “Green Trail”, a bike path designed to increase the safety and convenience of bicycle commuting.

Even more importantly from the perspective of the County, a surface route from the Silver Spring Transit Center on roads through the center of downtown Silver Spring will have devastating traffic impacts on the business district, even worse than is the case today, and the vitality of the recently revived downtown, in which the County has heavily invested, will be threatened. According to MTA data, on the average of every three minutes from one direction or the other (every six minutes from one direction), during three-hour peak periods in both the morning and evening, long 180-foot-long trains will crawl past Georgia Avenue, enter the intersection of Wayne and Fenton Street diagonally as a fifth stream of traffic, and pass the parking lot entrance to the Whole Foods shopping center – at what are likely to be speeds of no more than 5 to 15 miles per hour. This surface route in the downtown is likely to increase traffic gridlock as well as convert what should be a rapid trip into a long slog through the downtown. It should be kept in mind that MTA’s figures indicate that only a small portion of the Purple Line ridership will be coming from cars, as most will be coming from buses and other forms of mass transit. Therefore, not many cars will be coming off the road to offset these traffic delays.

Tunneling

MTA and others have said that a tunnel would be too expensive, would not be cost-effective, and would provide few benefits. However, MTA recently released data that tends to indicate that while a tunnel is not cheap, it can be designed to be part of a “hybrid” route that keeps costs reasonable, improves ridership and travel times, and remains competitively cost-effective for purposes of qualifying for federal funding. After MTA released its study in October, it provided figures to the Montgomery County Planning Department for a “hybrid” (“mix and match” segments) for the entire 16 miles that would take what is known as the “medium-investment LRT alternative” and mix it with a tunnel under the downtown – keeping the surface route on Wayne but removing the stations at the new Silver Spring Library (Bonifant and Fenton Streets) and at Dale Drive. The results indicated that a hybrid with a tunnel under the downtown *is* cost effective (a term of art that the Federal Transit Administration uses for determining eligibility for funding). In fact, the cost effectiveness measure is virtually the same as the medium-investment light rail alternative that MTA evaluated – the cost effectiveness figures fall within 0.3% of each other. Moreover, MTA’s figures also showed that such a hybrid would both decrease travel time and increase ridership. In fact, ridership for the entire Purple Line increased by a significant 2,100 riders, even though MTA had indicated to the community earlier that a tunnel without stations at the library and Dale Drive would result in the loss of 2,375 riders.

The Montgomery County Planning Department has now requested that MTA provide data about a second hybrid – one that would be similar to the first hybrid, but, in addition, would include the half mile of tunneling under Wayne from Cedar to Mansfield. The Planning Department has estimated that this second hybrid would cost just under \$1.4 billion and that the cost effectiveness of this option would be within the acceptability range for purposes of federal

funding. The \$1.4 billion figure is still significantly less than the more than \$1.6 billion for the high-investment LRT alternative (which had been the most expensive of six LRT and BRT alternatives that the MTA had previously evaluated). Also, compare the \$1.4 billion figure with the \$5.2 billion cost of the Dulles Silver Line Metro project, which the Federal Transit Administration in early December recommended for federal funding in spite of the fact that the FTA had earlier indicated that this project was not cost effective.

Below is the chart that MTA provided the Planning Department on October 27, 2008 regarding the first hybrid:

Measure	Medium Investment LRT	Medium Investment LRT with High Investment Tunnel Segment*	High Investment LRT
2030 Daily Boardings	62,600	64,700	68,100
2030 New Daily Riders	11,000	11,200	12,300
2030 Annual User Benefits (hours)	6,389,000	6,601,000	7,299,000
Capital Costs (2007 dollars)	\$1,220,000,000	\$1,330,000,000	\$1,635,000,000
Annual O&M Cost (2007 dollars in millions)	\$25,000,000	\$24,000,000	\$22,200,000
FTA Cost-Effectiveness Measure (cost per hour of User Benefit) relative to TSM	\$22.82	\$22.89	\$23.71

* includes High Investment LRT segment between Silver Spring Transit Center and Manchester Place (tunnel segment between Silver Spring Transit Center and Wayne Avenue at Cedar Street; no Dale Drive station)

[Note: For FTA funding purposes, a project with a cost effectiveness figure of \$24.00 or less fall within the acceptability range. Where a project falls within the acceptability range generally does not matter to FTA. If the cost effectiveness figure is over \$24, the case for federal funding is much harder to make. In fact, the light rail alternatives, which MTA appears to favor, have much higher cost effectiveness figures (that is, they are less cost effective) than the bus rapid transit alternatives.]

MTA's Purple Line project manager, Mike Madden, was quoted in the Silver Spring Gazette on November 26, 2008 as saying that a tunnel on Wayne Avenue was not feasible since it would need to be tunneled very deep under Sligo Creek and could not reach the surface again until University Boulevard. This is not a helpful statement and is misleading in that it does not speak to the tunnel that the community is actually requesting. What Mr. Madden did not say is that for more than a year, the community has not asked for a tunnel under Sligo Creek, even though our written questions asking for substantiation of the MTA's engineering claims regarding the longer

tunnel were never answered. Since October 16, 2007, at an MTA focus group meeting at Oak View Elementary School in Silver Spring, the community (in response to the concerns that MTA raised) has asked that the shorter one-half mile tunnel under Wayne from Cedar Street to Mansfield Road – one that would emerge prior to Sligo Creek – be studied. For three months, until the middle of January 2008, MTA would not study this. Finally, MTA reported that they had performed a preliminary analysis of the shorter tunnel, and stated that it would study a tunnel no further. Therefore, a full study of the shorter tunnel was never conducted, and MTA's Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) contains only one paragraph on both the longer and shorter tunnel options under Wayne.

MTA gave the following reasons in the AA/DEIS, at pages 2-4 to 2-5, for not studying the half mile of tunneling under Wayne Avenue (that is, the shorter tunnel, which extending eastward would exit prior to Sligo Creek and which the community has asked for): It would add to the project cost and would have “a detrimental effect on the cost”; it would not provide sufficient benefit; it would not provide travel time benefits; it would be necessary to retain stations for the community and underground stations would cost too much; and a tunnel portal (entrance/exit ramp into/out of tunnel) would result in street widening and retaining walls in front yards due to steepness, as well property being taken from Sligo Creek Park.

However, the facts are these:

1. The figures MTA recently provided the Planning Department indicate that travel time and ridership would improve significantly, even with a tunnel that extends only under the downtown. Those figures will improve somewhat more with the additional half mile of tunneling under Wayne.
2. The same data which MTA provided the Planning Department shows that the costs are reasonable, and the implication that the shorter tunnel would not be cost effective appears not to be the case.
3. The community did not ask for a station at Dale Drive, either at surface or underground. The civic associations formally asked for a study of the longer tunnel under Wayne at the end of September 2007, and on October 16, 2007, MTA announced that the longer tunnel would not be studied and – at the same time – that it was adding a station on Wayne at Dale Drive for the surface route. Prior to the summer of 2007, there was also no station planned for the new library. Originally, there were to be no stations between the Silver Spring Transit Center and Long Branch, about the same distance between the Takoma Park and Silver Spring Metro stations. Presently, there are more planned stations for Silver Spring than for any other segment of the Purple Line. Moreover, in a community of almost exclusively single-family homes within a half mile of the proposed Dale station that are not closer to another station, there is no demonstrated need for a station at Dale. *The alleged need for a station at Dale, which is not supported by reality, should not be used as a reason why tunneling is not feasible under Wayne.*
4. An underground tunnel at Dale would have been the only underground station in the entire 16 miles of the Purple Line. The suggestion of an underground station came only from MTA and has been used to indicate that tunneling would also include a prohibitive \$100-110 million station at Dale.
5. Of course, there would be some widening of Wayne for a tunnel portal somewhere near

Mansfield Road. What MTA does not indicate anywhere in the AA/DEIS is that the tunnel portal would result in widening for the 350 to 400 feet of the portal length, compared to widening for a total of one-half mile (2,640 feet) on Wayne between Fenton Street and Sligo Creek Parkway for long left turn lanes and the Dale station that will accompany a surface route. (In fact, MTA's engineering drawings indicate that the surface route would result in approximately 625 feet of widening just for the Dale station – median extending from intersection, long platform, and phasing in of lanes to the station.) Because the surface route along Wayne requires a far greater amount of widening than what would be required for a tunnel portal, MTA's claim that street widening required to support the tunnel portal would represent an adverse impact on the community is disingenuous.

6. When mentioning the possibility of land being taken from Sligo Creek Park for widening due to a tunnel portal, MTA ignores the fact that for its addition of left-turn lanes at Sligo Creek Parkway in the surface route, there will be widening of Wayne for approximately 425 feet past the Park leading up to Sligo Creek Parkway.
7. Although it mentions that there would be widening due to a tunnel portal near Mansfield Road, there is little mention in the AA/DEIS of the widening due to a tunnel portal on Wayne at Cedar Street, at the very edge of the Silver Spring Central Business District (CBD), that would be built if a tunnel under downtown Silver Spring exited at Wayne and Cedar – one of the options which MTA did study in the AA/DEIS. And there is little mention of the widening of streets and the impacts on property, both within and outside of the right of way, of tunnel portals in other segments of the Purple Line, such as on Arliss Street in Long Branch.

Adverse Impacts of Surface Route through Downtown Silver Spring and on Wayne Avenue

The surface route through downtown Silver Spring and on Wayne Avenue has a number of significantly adverse impacts, most of which are not mentioned in the AA/DEIS. These adverse impacts have therefore not been conveyed to the public and decision-makers.

Interestingly, many of these were mentioned to representatives of the civic associations prior to release of the AA/DEIS. The adverse impacts include:

1. Traffic backups that will occur through downtown Silver Spring for several blocks on Georgia Avenue, Fenton Street, and Wayne Avenue as a result of long, slow trains passing through the downtown at 20 times an hour during long peak periods, as discussed above. Neither traffic through the downtown CBD nor traffic on Wayne with a surface route was adequately studied (this lack of an adequate traffic study is addressed below).
2. The loss of space at the long-promised community library due to the Purple Line cutting a wide swath across its property to stop. The proposed stop is only a four-block, six-minute walk to the Silver Spring Transit Center. All retail and housing, existing and planned, near the proposed library, including the Ellworth Street restaurants and shops/Whole Foods/Majestic Theatre/Marriott Courtyard Hotel and the planned development in the Fenton Village area of downtown south of Wayne Avenue, is within five to ten minutes of walking from the Silver Spring Transit Center for slow to moderate walkers.
3. The loss of one or two lanes of parking on Bonifant Street in the midst of a crucial area of redevelopment in the CBD. The loss of parking on one side of Bonifant will also affect deliveries to businesses on Bonifant.

4. The combined impact of the surface route and backup of cars entering and exiting the Wayne Avenue Garage in worsening congestion at the Wayne and Fenton intersection.
5. The impact of frequent trains on traffic entering and exiting the Whole Foods shopping center parking lot, and the impact from the parking lot on the surface route. Neither impacts on and from the Wayne Avenue Garage nor those relating to the Whole Foods parking lot are mentioned in the AA/DEIS despite MTA identifying them as areas of concern in meetings with representatives of the civic associations.
6. The impact of the Purple Line, including the street widening, on St. Michael's Church and its school across the street, including daily crossings of Wayne Avenue by a school full of children to attend mass.
7. The substantial widening of much of the just over one mile of Wayne on which the Purple Line will run, as indicated by MTA's engineering drawings, but not discussed (nor even summarized) anywhere in the AA/DEIS. This widening includes:
 - a. nearly two-thirds of the length of Wayne Avenue, from Fenton Street to the point 900 feet east of Sligo Creek Parkway where the train would veer off Wayne;
 - b. nearly 60% of the distance from Fenton Street to Sligo Creek Parkway;
 - c. virtually the entire block from Fenton to Cedar, and an additional 150 feet east of Cedar;
 - d. widening on Wayne at both sides of Dale Drive for a continuous length of approximately 1,200 feet;
 - e. widening on Wayne at both sides of Sligo Creek Parkway for a continuous length of approximately 1,350 feet.

Most of this will be for long left turn lanes at Fenton, Cedar, Dale, and Sligo Creek Parkway. The widening of Wayne on the eastern side of the Dale Drive intersection will be for a length of approximately 625 feet related to a station at Dale – but this is not mentioned in the AA/DEIS. Some of the widening will be to 70 feet, the width of Colesville Road. At Dale Drive, if MTA decides to put in two station platforms, the drawings indicate that the widening there would be to 90 feet.

8. The widening will result in loss of land from numerous front yards, both within and outside of the legal right of way. The AA/DEIS states that there will be some "strip acquisitions" but does not indicate where these, and all widening (not just the technical strip acquisitions, which are beyond the current right of way), are – even though the widening is indicated on the engineering drawings and the widening has been summarized by one of the civic associations.
9. The widening for long left-turn lanes will result in increased traffic capacity, and eventually increased traffic. This is not mentioned in the AA/DEIS and apparently not factored into the traffic analysis discussed in the Traffic Analysis Technical Report appended to the AA/DEIS.
10. MTA has indicated to the community – but not mentioned in the AA/DEIS or apparently factored into the traffic analysis – that traffic westbound on Wayne Avenue (from Sligo Creek Parkway to the CBD) will be delayed and prohibited from turning left onto Dale Drive toward Piney Branch Road while a train is in the Dale station.
11. The impact of passing trains, increased traffic, wider streets, and possible changes to the bike Green Trail (see below) on the pedestrian safety of independent residents at the Springvale Terrace Assisted Living facility on Wayne.
12. MTA does not indicate in the AA/DEIS that due to the extensive widening of Wayne for the Dale station, it plans to close the Wayne Avenue access to the large parking lot for Silver

Spring International Middle School and Sligo Creek Elementary School and reroute the traffic to Dale Drive and the side streets behind the schools. This will have significant adverse impacts on the schools, neighborhood, and traffic. Although MTA has on several occasions indicated this to the civic associations, it has not notified the two schools' administrators and PTAs of its plan, nor has MTA advised the community of any plan for a redesign of the parking lots that would be safe for the students and in compliance with the law.

13. MTA has told the community that in order to save space, it has recommended to the County that the planned bicycle Green Trail continuing on the north side of Wayne from Whole Foods to Sligo Creek be merged with the sidewalk into a combined bike/pedestrian path. This raises safety concerns for both bikers and pedestrians, including churchgoers, the elderly at Springvale Terrace, and the schoolchildren at the elementary and middle schools at Wayne and Dale. The surface level Purple Line on Wayne will have impacts on the Green Trail, whether it is merged with the sidewalk or not – but this issue is not identified in the AA/DEIS.
14. The noise analysis in the AA/DEIS apparently did not factor in the sounds of braking, clanging bells or beeping, and amplified announcements on the train and at the station as trains near the Dale station. It also did not fully account for the “wheel squeal” that occurs as trains round sharp curves – and there are numerous curves on Wayne.
15. The traffic analysis, as indicated in the Traffic Analysis Technical Report, was evidently based in part on an assumption that cars can travel at 45 miles per hour on Wayne, although the speed limit on Wayne is 30 mph, and at various times near schools, 25 mph. Indeed, the traffic test runs in the Traffic Technical report appear to indicate that at one point, *an MTA test vehicle traveling along the proposed route reached a speed of 50 mph.*
16. The traffic analysis was based upon an assumed traffic growth rate of less than 0.9% annually (not the “approximately one percent per year” stated in the AA/DEIS), despite the fact stated in the AA/DEIS that historical data for the past ten years has shown that the actual growth of traffic in the areas immediately adjacent to East Silver Spring are 1.5% annually and 1.9% annually, respectively. Despite repeated written requests by our community for additional traffic simulations using more realistic values than the 0.9%, MTA specifically declined to perform or provide that analysis.

(A tunnel route under downtown Silver Spring only, with a surface route on Wayne from Cedar Street eastward would have most of the adverse impacts discussed above, given the surface route on Wayne. However, other than indicate that there would be “visual impacts,” the AA/DEIS addresses very little of the impacts of a tunnel portal extending eastward for 350-400 feet on Wayne past Cedar where the downtown tunnel would emerge. These impacts would include widening for the full length of the tunneling. Moreover, a portal at Cedar Street would be one of the worst places on the route to place a portal, since it would be literally at the very edge of the CBD, a half block from the Whole Foods shopping center parking lot entrance on Wayne. This portal would prohibit a left turn from Wayne onto Springvale that provides the fastest access for emergency response paramedics to the Springvale Terrace Assisted Living facility. There would also be a substantial impact on traffic entering and exiting the downtown due to cars having to swerve widely around a portal at that point.)

MTA has never directly and specifically notified the 60 homeowners on Wayne, St. Michael's

Church and its school, Springvale Terrace Assisted Living facility, Sligo Creek Elementary School, and Silver Spring International Middle School of the widening on Wayne, traffic issues, and other potential impacts of the surface route. In fact, these are not adequately discussed, if at all, in the AA/DEIS, a document primarily intended to fully and accurately inform the public.

MTA's projected figures for daily station boardings at the Dale station (a station which was not requested by the community but which MTA has insisted on) is unrealistically high for each of the six light rail and bus rapid transit alternatives studied and does not conform to either field observation or common sense. For medium-investment light rail, the estimate is 1,400 daily boardings for that station a number that is considerably greater than the number of single-family homes (there are few other kinds of residences in the neighborhood) within a half mile of the station! This was also more than the 900 daily station boardings for medium-investment light rail that were projected at the next station to the west, Manchester Place, which is closer to a number of high-rise apartments than the planned Dale station. In fact, the County's daily station boardings at morning rush hour for the Ride On #15 bus (provided by the Planning Department) show only *four* (4) boardings at Dale Drive (and very few at nearby stops) and 145 at the Sligo Creek stop alone. Those using the Sligo Creek stop clearly live nearer to the planned Manchester Place station. It is difficult to see how there can be more than 200 daily station boardings at the Dale station, and yet MTA has used the alleged need for that station as a reason not to seriously consider tunneling under Wayne. Among other concerns about a station at Dale, the community is concerned that due to transit-oriented development, there will eventually be rezoning near such a station permitting commercial development and higher density residential development.

Earlier this year, the County Council took \$60 million dollars off MTA's budget for the Purple Line by authorizing County funds for the building of a south entrance to the Bethesda Metro station. It is clear that a primary purpose this construction is to facilitate the Purple Line and transfer between it and the Red Line. The cost of the half mile of tunneling under Wayne Avenue in poorer neighbor Silver Spring is thought by the Planning Department staff to be around \$65 million.

There seems to be consensus among many that an effective east-west transit system is needed in Montgomery and Prince George's Counties, and this community fully supports that concept. Yet, the Purple Line that has been proposed is not Metro, and it is not Metro-like rapid transit. According to MTA figures, the Purple Line is 8 to 10 minutes slower end to end (Bethesda to New Carrollton) at rush hour for medium-investment light rail than it now takes during rush hour to take the Red Line from Bethesda to DC Metro Center, transfer to the Orange Line, and take that to New Carrollton. The Purple Line AA/DEIS in its analysis of greenhouse gas emissions, at page 4-48, states that greenhouse gas emissions in the form of CO₂ emissions for each of the six light rail and bus rapid transit alternatives studied "demonstrate almost no change" from the No Build alternative in the same future year. It further states (same page), as confirmed by an accompanying chart, that all three light rail alternatives "are predicted to produce slightly higher CO₂ emission burdens as compared to the No Build alternative."

This community clearly believes that there are benefits to a Purple Line, but given the above drawbacks of a far less than stellar option – one that as designed does not compare to the Metro

system and is more of a streetcar system – does it make sense that neighborhoods adjacent to downtown Silver Spring and the usability of the downtown be sacrificed for this type of a Purple Line? Doesn't it make greater sense to try to correct the problems of what stands to be the weakest link in the system and do it in a way through the downtown and those neighborhoods that enhances the entire line, the downtown, and the community and that truly will be there for the next generation? Our Association has heard arguments that we can't "risk the project" by adding costs to the Purple Line. But if we are committed to building an infrastructure project that will last for 30 or 50 or 100 years, then isn't it important to build the best Purple Line that still meets the FTA cost-effectiveness guidelines? And isn't it a greater risk to build a Purple Line that is slow, that will be underutilized due to that lack of speed, and that will disrupt the Silver Spring redevelopment and a long-established neighborhood?

For these reasons, the Seven Oaks-Evanswood Citizens Association (SOECA) believes that it is necessary to tunnel any Purple Line through downtown Silver Spring and under Wayne Avenue for a half mile from Cedar Street to Mansfield Road.

Respectfully submitted,
Seven Oaks-Evanswood Citizens' Association (SOECA), Silver Spring
Mark Gabriele, President

- RECORD #1233 DETAIL

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Submission Content/Notes : Jonathan, J-O-N-A-T-H-A-N, Jay, J-A-Y. I am Vice President of the Seven Oaks Evanswood Citizens Association, SOECA, a county chartered association representing approximately 700 households directly to the northeast of downtown Silver Spring.

I have also been a member for the last year of Montgomery County planning board's purple line advisory group. I am speaking today on behalf of SOECA and it's President, Mark Gabrielle, who unfortunately could not be here today due to out of town business.

For most of our community, the issue is not whether, but how to do it in Silver Spring and how to do it right.

SOECA is opposed to a purple line that runs at street level on Wayne Avenue which would be the only largely residential street in the 16 miles of the purple line. We believe that for a short distance on Wayne the purple line needs to be tunneled in the same manner that most of Metro through communities and business areas through Washington, DC is tunneled.

This tunnel would need to connect with the tunnel under downtown Silver Spring, one that MTA has studied.

SOECA has a clear position on the purple line through Silver Spring. This position was developed after three years of listening to MTA presentations and an intensive fact gathering effort by the association's purple line task force, and very patient and deliberate consideration by a community that supports and uses mass transit and prides itself on that.

By an overwhelming majority vote at a standing room only meeting with three times the previous record attendance, the association voted, and I quote, "in support of a sensible mass transit solution for Silver Spring. A purple line that is not built at street level on Wayne Avenue."

The resolution advocates a tunnel under Wayne Avenue so as to avoid the significantly adverse impact the street level route will have on traffic and the neighborhoods in downtown Silver Spring.

Before that vote - Civic Association, Park Hill Citizens Association passed resolutions requesting that MTA study a tunnel under Wayne.

When MTA responded that there were engineering problems going under Sligo Creek, members of the community suggested as early as October, 2007 that MTA study a much shorter tunnel under Wayne that would exit before Sligo Creek near Mansfield Street.

When MTA finally reviewed a tunnel and dismissed it from further study after only a preliminary analysis, however there is now data from MTA to indicate that it is more than likely that there is a way to plan a hybrid route with a tunnel under Wayne that would be cost effective and increase riders and reduce travel time.

This should open the door for a dialogue among MTA, the county and the neighborhood civic associations representing the community to make a tunneling route work for this community and the downtown, and in the process improve the effectiveness of the purple line.

Given an up to \$1.6 billion transit project that is neither a Metro nor Metro light rapid transit and will take a small portion of its ridership from cars, it would be wise to rethink this segment and improve the purple line by tunneling under Wayne Avenue and downtown Silver Spring.

Otherwise, the surface route through this portion of Silver Spring will likely be the purple line's slowest segment, do little to improve transit or traffic in Silver Spring, and be a drag on the rest of the system. Let's do it right. Thanks.

- RECORD #515 DETAIL

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Submission Content/Notes : WRITTEN COMMENTS ON PURPLE LINE AA/DEIS SUBMITTED BY JONATHAN JAY, SOECA

Diane Ratliff

Director of Planning

Maryland Transit Administration

I am submitting these written comments to be included in the complete record for the public's review of the Purple Line AA/DEIS.

What follows is a somewhat longer version of the testimony I gave at MTA's November 22 public hearing at Montgomery College in Takoma Park:

I am Jonathan Jay, and I reside at 606 Woodside Parkway in Silver Spring. I am Vice President of the Seven Oaks-Evanswood Citizens Association (SOECA), a county-chartered association representing approximately 700 households directly to the northeast of downtown Silver Spring. I have also been a member for the last year of Montgomery County Planning Board's Purple Line Functional Master Plan Advisory Group. I am delivering these comments on behalf of SOECA and its President Mark Gabriele, who unfortunately could not be at the hearing due to out-of-town business.

For most of our community the issue not whether – but, rather, how to do the Purple Line right in Silver Spring. SOECA is opposed to a Purple Line that runs at surface on Wayne Avenue, which would be the only largely residential street in the 16 miles of the Purple Line. We believe that for a short distance on Wayne, for half a mile, the Purple Line needs to be tunneled, in the same manner that most of Metro through communities and business areas through Washington, DC is tunneled. This tunnel would need to connect with a tunnel under downtown Silver Spring, one that MTA has studied.

SOECA has a clear position on the Purple Line through Silver Spring. This position was developed after three years of listening to MTA presentations and an intensive fact-gathering effort by the association's Purple Line Task Force – and very patient and deliberate consideration by a community that supports and uses mass transit. By an overwhelming majority vote at a standing-room-only meeting with three times the previous record attendance, the association voted "in support of a sensible mass transit solution for Silver Spring – a Purple Line that is not built at street-level on Wayne Avenue." The resolution advocates a tunnel under Wayne Avenue so as to avoid "the significantly adverse impact a street-level route will have on traffic, the neighborhoods, and downtown Silver Spring."

Before that vote, both SOECA and its neighbor civic association, Park Hills Citizens Association, passed resolutions requesting that MTA study a tunnel under Wayne Avenue. When MTA responded that there were engineering problems with a tunnel going under Sligo Creek, members of the community suggested as early as October 2007 that MTA study a much shorter tunnel under Wayne Avenue that would exit before Sligo Creek near Mansfield Street. Yet, when MTA finally and belatedly reviewed a tunnel, it dismissed it from further study after only a preliminary analysis. However, there is now data from MTA to indicate that it is more than likely that there is a way to plan a hybrid route with a tunnel under Wayne that will be cost effective, increase riders, and reduce travel time. In fact, based on MTA figures, it would appear that a hybrid route, with a tunnel under downtown Silver Spring and Wayne Avenue so as to avoid the significantly adverse effects of this segment of the Purple Line route, can be built for less than \$1.4 billion, more than \$200 million less than the amount of the "high-investment" light rail route that MTA has studied.

The feasibility of such a route, as indicated by the new information, should open the door for a dialogue among MTA, the County, and the neighborhood civic associations representing the community so as to make a tunneling route work for this community and the downtown, and in the process improve the effectiveness of the Purple Line.

Other members of the community in testimony and written comments will discuss the adverse effects of a surface route through downtown Silver Spring and on Wayne Avenue through the community. Most of these were not even identified in the Alternatives Analysis/Draft Environmental Impact Statement, although MTA had previously discussed a number of them with representatives of the civic associations. Others will also identify errors in MTA's rejection of a full and earnest study for a short tunnel under Wayne Avenue.

Given an up to \$1.6 billion transit project that is neither Metro nor Metro-like rapid transit and will take a small portion of its ridership from cars, it would be wise to rethink this segment and improve the Purple Line by tunneling under Wayne Avenue and downtown Silver Spring. Otherwise, the surface route through this portion of Silver Spring will likely be the Purple Line's slowest segment, do little to improve transit or traffic in Silver Spring, and be a drag on the rest of the system. If the Purple Line is to be built, let's do it right.

Thank you.

Jonathan Jay

Vice President, Seven Oaks-Evanswood Citizens Association (SOECA)

Member, Montgomery County Planning Board's Purple Line Functional Master Plan Advisory Group

- RECORD #1262 DETAIL

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Submission Content/Notes : Good afternoon. My name is Jean Kavanaugh, J-E-A-N, K-A-V-A-N- A-U-G-H. I live at 9207 Wirth Avenue in Silver Spring. I am the Secretary for the Evans, Seven Oaks Evanswood Civic Association.

I am speaking today on behalf of SOECA and a majority of our community.

At a vote last spring, our association voted against an at-grade purple line down Wayne Avenue. Our association members use and support mass transit.

We support the tunneling of the purple line under Wayne Avenue. A purple line that is light rail would move slowly through congested areas of downtown Silver Spring and along the residential Wayne Avenue.

Tunneling the purple line would offer a faster route for commuters and travelers and be a sensible alternative to driving.

Wayne Avenue runs through SOECA's neighborhoods. Tunneling the purple line under Wayne Avenue would preserve the character of our neighborhood.

The purple line as a light rail system will widen large sections of Wayne Avenue, some of it to the width of Colesville Road, making it difficult for children to cross to the schools, the middle school and the elementary school, or neighbors to walk to visit each other.

A wider Wayne Avenue that comes with the light rail option would encourage more cars to use Wayne Avenue.

The drivers of these cars, however, will encounter the 180-foot trains going along the road at Wayne Avenue and try to get around them by cutting through our neighborhoods, worse than they do now, endangering pedestrians and children.

The tunneling option would eliminate the need to widen Wayne Avenue. If the light rail purple line is approved, the county can allow rezoning to higher density residences and businesses at the light rail stations in the residential areas along Wayne, well before the purple line will ever be built.

It will be difficult for our infrastructure to support high density development in our neighborhood, and it will add greatly to traffic years before we get relief of any kind of purple line.

If the purple line were underground, we would not need a purple line station at Dale Drive right in the middle of our neighborhood and our zoning would remain as it is now.

Tunneling would eliminate much of the noise pollution that comes with light rail, including the added noise with trains breaking at the station and announcements on trains at stations as trains near the station.

SOECA continues to request tunneling under Wayne Avenue as the best option for that section of the purple line. Thank you very much.

- RECORD #1057 DETAIL

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Submission Content/Notes :	<p>The Sierra Club, Montgomery County Group, would like to submit our comments on the Purple Line DEIS. They can be found in the attached document.</p> <p>Thank you.</p> <p>David Hauck Chair Sierra Club Montgomery County Group</p> <p>301-270-5826</p>
Attachments :	Purple Line DEIS SC comments 12_17_2008.pdf (48 kb)



Montgomery County Group

December 17, 2008

Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th floor
Baltimore, MD 21202

The Sierra Club Montgomery County Group supports the Purple Line as light rail between New Carrollton and Bethesda, using the Georgetown Branch right of way between Silver Spring and Bethesda. But we do not support it unconditionally.

A light rail line provides many benefits to sustainable land use and transportation for Montgomery and Prince George's County, and for the region as a whole. But it also has local environmental impacts on a valued green and recreational feature. These impacts can be minimized through careful design and construction. If MTA uses the impact reduction measures described in this letter, the Purple Line connecting four Metrorail and two MARC radial lines, will clearly yield more benefits than costs to our natural environment by promoting sustainable growth and contributing to climate protection.

Among the three light rail alternatives described in the DEIS, we believe the Medium Investment alternative maximizes benefits relative to costs. In addition, we note the following benefits of the Purple Line as light rail compared to Bus Rapid Transit (BRT):

1. Transportation. The medium investment light rail alternative provides much faster travel times than BRT between some key destinations. The rail trip from Bethesda to Silver Spring would take 9 minutes compared to 19 for even the High Investment BRT. Likewise, the rail trip from Bethesda to the University of Maryland would be 34 minutes for medium light rail, versus 49 for medium BRT. The rail travel times would rival driving times, while the BRT would not. It is often said that the Purple Line will not greatly reduce congestion on the Beltway, but these traffic model results show that a rail Purple Line would give people an attractive alternative to driving in heavy traffic.

2. Sustainable growth pattern. According to Christopher Leinberger, noted land use economist¹, extensive research shows a powerful effect of rail transit stations on the location of growth. The same effect has not been found around BRT stops. While critics are correct that the Purple Line stations would not have a significant effect on growth of the Bethesda or Silver Spring business districts, it would certainly stimulate growth in Prince George's County, from the Takoma Langley station all the way to New Carrollton. This change in the growth pattern resulting from the economic stimulus of rail stations is not captured in the traffic modeling, which always assumes the same growth pattern in all alternatives. But in practice, it would

probably increase ridership and widen the gap between the benefits of light rail versus BRT.

3. Economic justice. The Purple Line would bridge the economic divide that splits the region, separating the eastern suburbs from the prosperity of the western suburbs. Over time, the Purple Line would stimulate economic activity on the poorer side of the divide. One envisions a scenario in which the Purple Line at first provides excellent access from places like Langley Park and the University Boulevard corridor to job centers in Silver Spring, Bethesda and the I-270 Corridor. Then, the presence of a desirable work force stimulates technology and other employers to relocate or grow in Prince George's.

Prince George's County badly needs a dominant employment corridor and large urban centers such as those that have focused growth in Montgomery County. The Purple Line would provide an efficient travel route between the Red Line/I-270 Corridor (Montgomery County's economic engine) and the Green Line, which Leinberger calls Prince George's Red Line. The efficient rail connection between the corridors would stimulate growth at Green Line stations where Prince George's and its municipalities want it, including Prince George's Plaza, College Park and Greenbelt.

4. Environmental/energy impact. The higher ridership on light rail means these alternatives will provide a greater reduction in car miles driven, thus reducing the CO2 emissions. Clearly, the right of way for two light rail tracks would be narrower and more pervious to rainwater than would two road lanes for buses. The issue of relative carbon dioxide emissions from a light rail system powered by electricity generated from current power plants compared to hybrid-electric buses is less clear. But assuming that, over time, electricity is generated from wind and other renewable sources, the greater efficiency of rail over road travel will give it the edge in reducing greenhouse gas emissions.

Environmental Impacts Must be Minimized

As stated initially, we support the Purple Line assuming that the local environmental impact is minimized. Measures should go beyond providing an improved bikeway and include the following components:

1. Minimize the clearance of trees and shrubbery during construction. MTA officials have stated their intent to clear most of the Georgetown Branch right of way. They have not responded to requests to minimize the width of the cleared area, nor have they shown clearly that so much clearing is necessary.

2. Install tracks in a narrow green roadbed. We and others have asked MTA officials repeatedly to put the Purple Line tracks on a grassy roadbed. Their response has been inconsistent. An MTA slide presentation, "Prince George's and Montgomery County Briefing, July 31, 2008", seems to commit MTA to a grass roadbed. Several slides show pictures of existing green roadbeds in European light rail systems, which we assume would be models for the Purple Line. Yet the DEIS Summary picture of the Purple Line along Wayne Avenue illustrates the train on a paved bed that looks as wide as three road lanes. Numerous European light rail lines run on two closely spaced tracks with grass beneath and trees overhead. The trees make the electric poles and wires less noticeable. We have heard no reason that MTA cannot do

likewise, and we expect assurance that they will.

3. A park-like setting for track and bikeway. MTA plans to plant trees along the Purple Line, but they should do more to preserve or recreate a natural greenway for riders, cyclists and walkers. Clearing of current vegetation should be minimized. Landscaping should include a variety of native trees and other native vegetation.

4. Minimal forest clearing at crossings of Rock Creek, Sligo Creek, Long Branch, and Northwest Branch. Table 4.4-1 in Chapter 4 of the DEIS shows insignificant differences in park impacts among the various options, and the acreage of each impact is less than one acre. However small these impacts may appear, they can be made smaller by using more closely spaced tracks. Careful attention must also be paid to placing staging areas so that forest clearing not essential for the transit line itself is avoided. We note that the DEIS dismisses impacts to Rock Creek because (DEIS p. 4-21) “All of the alignments cross Rock Creek Regional Park within the County-owned Georgetown Branch right-of-way and would not require park property.” We expect very careful planning with respect to this crossing, since the construction process will have an impact on the park experience and downstream water quality.

In conclusion, we urge State officials to choose a mode and route, not on the basis of short term economy but instead on long term benefits. The DEIS makes it clear that the medium rail alternative provides the level of service that gives the inner suburbs not only a sustainable, efficient transport route, but also a connection among many rail corridors that will shape sustainable growth in all these corridors. But we also want assurance that MTA planners are as skilled and committed as their European colleagues to producing a community asset.

The Sierra Club requests the opportunity to review and comment on the detailed design of whatever Purple Line mode and route is selected with regard to the environmental concerns raised in this letter.

Sincerely,

David Hauck
Chair
Sierra Club, Montgomery County Group
301-270-5826

¹ As stated at a panel discussion on the Purple Line, Brookings Institution, 3 Dec 2008

- RECORD #1246 DETAIL

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Submission Content/Notes : My name is Ravi Singh, that's R-A-V-I, S-I-N-G-H. I live on Ellswood Drive and I'm a member of Silver Spring Advocates and SOECA. I support Alternative 7.

I support the light rail because access to sensibly designed and efficient mass transit has had a profound impact on my life and I'm sure the purple line will similarly impact the lives of many others.

I came to the U.S. 17 years ago to go to graduate school 30 miles outside Toledo, Ohio, which was also the closest source of degree-related jobs.

Living on a \$300 a month scholarship, I did not have the means to buy a car. Without a car and no mass transit, those jobs in Toledo were tantalizingly beyond my grasp.

Everyday pains like a trip to buy groceries or to shop for a pair of pants had to be carefully planned. A move to New York City changed everything.

Efficient and inexpensive subways expanded my options and allowed me to pursue and land my dream job and get a decent start in life.

Even today I value not being car dependent. In fact, one of the main reasons I live in my neighborhood is that it is within walking distance to the Metro.

One of the stated reasons for building a purple line is to help, and I quote, "a large number of people in the area who rely on transit."

There are many people living in the Langley Park area who fit this description perfectly. Many of them work two jobs to make ends meet and they travel to and from work predominantly by bus.

Imagine an individual who lives in Langley Park, say works as a nanny with a family in Bethesda and then cleans offices in Greenbelt in the evenings.

WMATA's online trip planner reveals that it would take this individual living at the intersection of University and New Hampshire and going to a home near Bethesda Metro approximately one hour to get to work in the morning, a similar amount of time to get to her second job in the evening, and 25 minutes to get home after work at 10 p.m.

That's a total of 2.5 hours of travel time presuming no traffic snafues. If this individual had access to the light rail purple line, she would get to Bethesda in 26 minutes, Greenbelt in 44 minutes and back home in 18 minutes.

That's a total of an hour and 24 minutes, a savings of 1 hour on her total commute. That's an example of how the purple line can ease the burden on someone whose life is fairly tough.

I would also like to communicate with those decision makers who are concerned with the economic crisis we find ourselves in. As an entrepreneur, I understand your concern. My business is hurting, too, and we are doing our best to reduce expenses.

Nevertheless, these tough times have also shown us that there are some key investments that we need to make so that we can emerge stronger from this crisis and be well positioned to capitalize on opportunities when the economy recovers.

Similarly in the case of Prince George's and Montgomery Counties and even for the state, the temptation to avoid investing in new transportation infrastructure may exist, but please remember that this is precisely the kind of investment that will rejuvenate the region and make it more prosperous.

I urge all the parties concerned to consider the demonstrated strong support. Remember the greater common good and make haste to break ground on this project. Thank you.

- RECORD #2810 DETAIL

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Submission Content/Notes : Diane Ratcliff,
MTA Director of Planning,
6 St. Paul Street, 9th Floor,
Baltimore, MD 21202

Dear Ms. Ratcliff:

In November, I submitted written comments and verbal testimony in support of the Purple Line on behalf of Silver Spring Advocates, a grassroots group dedicated to supporting both our community and the Purple Line.

Since that time, a great deal of neighborhood focus has been devoted to the idea of whether the Purple Line should travel in a tunnel under downtown Silver Spring and a portion of Wayne Avenue. Some of my Silver Spring neighbors are now suggesting that both an at-grade and a tunnel alignment should be advanced to Preliminary Engineering.

Unfortunately, those who are supporting the tunnel idea have failed to acknowledge the many tradeoffs that would be involved in using a tunnel. For starters, a tunnel would involve increasing the capital cost by as much as 15% over the cost of the medium investment LRT as presented in the AA/DEIS. In addition, there would be negative impacts such as the loss of a stop at Wayne Avenue and Fenton Street, the presence of a portal on Wayne near Mansfield or Cedar, and the use of dedicated lanes for the portion of the line that would still run at grade.

The attached matrix attempts to lay out these tradeoffs in a clear manner, and I would like the matrix entered into the public comment record.

Thank you again for the MTA's efforts to move this important project forward.

Attachments : Tunnel tradeoffs dec 08.pdf (31 kb)

Silver Spring Advocates

Supporting Our Community and the Purple Line

Tradeoffs: Purple Line Alignment on Wayne Avenue

Wayne Avenue is considered to be the likely path of the Purple Line through eastern Silver Spring. Despite the fact that many other metropolitan areas have successfully operated at-grade light rail systems, some Silver Spring neighbors have suggested that the community's interests would be served best by having the line run partially underground. The tunnel segment would travel under Silver Spring Avenue and Grove Street and then return to street level on Wayne, either near Cedar Street or Mansfield Road.

Using a tunnel would involve serious tradeoffs for our community. The negative impacts from a tunnel appear likely to dwarf those from an at-grade routing. This table summarizes the tradeoffs involved in the choice of an at-grade or tunnel routing through Silver Spring.

Issue	At-Grade Alignment	Tunnel to Cedar or Mansfield
Traffic – on Wayne Avenue and surrounding streets	+	-
	With <u>shared</u> lanes and left-turn lanes, most signalized intersections along Wayne would have same level of service (LOS) as currently is the case; some would have slightly <i>better</i> LOS with Purple Line. One exception to this would be the Wayne-Fenton intersection, which would have worse LOS during the afternoon rush. Spillover traffic is not projected to be significant. (Findings are from MTA traffic study.)	A portion of Wayne Avenue would have <u>dedicated</u> transit lanes (from the portal at Cedar or Mansfield to the point where the Plymouth Street tunnel starts, halfway up Wayne toward Flower). In addition, the portal at Cedar or Mansfield, by occupying two traffic lanes, would create a major bottleneck for all traffic on Wayne. Accordingly, this portion of Wayne Avenue would almost certainly have serious traffic impacts, e.g., rush hour back-ups extending well beyond the immediate area where the dedicated lanes are located, and spillover traffic in the neighborhood.
Widening and disruption of Wayne Avenue	-	-
	Potential for widening of much of Wayne Avenue (between Fenton and Sligo Creek) due to creation of left-turn lanes. However, a substantial portion of the widening would be negligible in actual amount (left-turn lane tapering areas) and, in addition, a substantial portion would involve the unused grassy area of the SSIMS school property, not private property. Nonetheless, no resident appreciates losing some of what feels like his/her front yard (even though some of that yard formally belongs to the County).	Would require major widening for the segment where the portal is located (even though Wayne would apparently be reduced to one lane in each direction). The portal opening and walls would be roughly 36 feet across, with a tunnel opening roughly 15 feet in height. It would continue for several hundred feet in length, until the point at which the transitway reaches street level from underground. Residents living adjacent to the portal would be unable to turn into driveways from the far side of the street. (See next page for construction-related impacts.) Opponents of the Purple Line have argued that portals close to schools would be a safety challenge.
Serving the local community	+	-
	Would provide <u>a stop at Wayne Avenue and Fenton Street</u> , enabling people to more easily avoid using their cars to shop, dine, and use entertainment sites and the new library in downtown Silver Spring, as well as Fenton Village. In addition, <u>a stop at Dale Drive</u> , which is favored by some residents, would be possible.	Would <u>not</u> allow a stop at Fenton Street (or Dale Drive) because of the cost of underground stations. Businesses in downtown Silver Spring and the Fenton Village area would not receive as much foot traffic as they would if there were a Fenton Street stop. Many more customers would drive, adding to our local traffic problems. Without local stops, Silver Spring gets less benefit of having the Purple Line in our neighborhood.

Capital cost	<p style="text-align: center;">+</p> <p>At-grade would avoid \$110-175 million of additional capital cost associated with tunnel to Cedar or Mansfield (per Planning Board staff memo).</p>	<p style="text-align: center;">-</p> <p>Tunnel to Cedar would have a capital cost of roughly \$110 million more than at-grade (9% increase). Tunnel to Mansfield would cost roughly \$175 million more than at-grade (15% increase).</p>
"Cost effectiveness"	<p style="text-align: center;">+/-</p> <p>Tunnel and at-grade alignments appear to have roughly similar "cost effectiveness" ratings (a calculation based on capital and operating costs, ridership and travel time saved).</p>	<p style="text-align: center;">+/-</p> <p>Tunnel and at-grade alignments appear to have roughly similar "cost effectiveness" ratings (a calculation based on capital and operating costs, ridership and travel time saved).</p>
Travel time	<p style="text-align: center;">-</p> <p>At-grade alignment would pass through Silver Spring somewhat more slowly, in large part because the at-grade alignment would use shared lanes on Wayne and could have stops at Fenton-Wayne and possibly at Dale-Wayne.</p>	<p style="text-align: center;">+</p> <p>As a result of having no stops and dedicated lanes (which will create traffic problems in our neighborhood), a tunnel alignment would pass through Silver Spring slightly more quickly. Paradoxically, this is <i>a benefit for those from outside Silver Spring who are transiting it</i> – not a benefit for our community.</p>
Ridership	<p style="text-align: center;">-</p> <p>As a result of the slightly slower travel time through Silver Spring, MTA estimates that the at-grade option would attract slightly fewer users than tunnel alignment.</p>	<p style="text-align: center;">+</p> <p>As a result of the faster travel time through Silver Spring, MTA estimates that the tunnel to Cedar would attract 2100 more trips per average workday (only a 3.3% increase over at-grade).</p>
Construction impacts	<p style="text-align: center;">+</p> <p>Construction impacts would be limited to Wayne Avenue and Bonifant Street.</p> <p>Construction would require reconstruction of the roadbed to allow installation of shared transit lanes (and a stop at Dale, if ultimately built), plus a replacement bridge at Sligo Creek.</p>	<p style="text-align: center;">-</p> <p>Construction impacts would include a significant portion of what is involved for an at-grade alignment (though a shorter stretch of Wayne and none of Bonifant).</p> <p><i>In addition</i>, the tunnel would involve construction impacts that extend across a much wider swath of downtown and east Silver Spring, probably lasting for two and a half or three years:</p> <ul style="list-style-type: none"> • The tunnel segment would be a machine-bored tunnel, according to MTA. This means that there would need to be a large area excavated (probably at the portal location) to allow assembly and "launching" of the boring machine and the removal of soil and rock. • The tunneling raises concerns about impacts on existing homes, especially those along Grove Street, and those on the portion of Bonifant and Wayne that the tunnel would pass underneath. • The portal at either Cedar or Mansfield would be a massive hole in the center of the roadway; Wayne Avenue would likely be closed for several years during construction.

- RECORD #1241 DETAIL

First Name :	Jonathan
Last Name :	Elkind
Business Name :	Silver Spring Advocates
Address :	415 Ellsworth Drive
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : My name is Jonathan Elkind, that's J-O-N-A-T-H-A-N, last name E-L- K-I-N-D.

I have been a homeowner in Silver Spring for nearly 18 years. I work as an Energy and Environment Consultant and as a non-residence senior fellow at the Brookings Institution in Washington, DC.

I'm a member of the Seven Oaks Evanswood Citizens Association and I'm a Chairperson of a grass roots group called Silver Spring Advocates, which is over 100 members.

I strongly support a light rail purple line and I hope the line will be built and built well, built soon and built right near my home.

Residents of the Maryland suburbs need the purple line for a reason that we can see with our own eyes. We are drowning in traffic and that means air pollution, water pollution, waste of lives and energy and a threat to our global climate.

Unless people have better transportation choices, this reality will simply go unchanged.

A broken global climate is not a legacy that I wish to leave to my three children, nor is a damaged neighborhood.

Having studied the MTA proposals intensively, including with my civic association's purple line task force, I find it stunning to hear today so many of the same myths and misinformation that have circulated in our neighborhood for months.

Let's look at the purple line. It's about mobility, community and access. Today many residents of Silver Spring work in Bethesda or College Park as I did a few years ago.

For me, getting back and forth required long and time wasting Metro rail routings or buses that ran infrequently and never reliably.

Purple line is also about stronger, better communities. Families that are well served by transit spend on average only 9 percent of their household income on transportation. Families in car-dependent suburbs spend 25 percent.

Poor families get hit much harder than the average. Neighborhoods served by light rail systems experience increased home values. A recent annual real estate survey noted that homes close to good mass transit systems are holding their value better than homes in areas that lack good transit even in today's terrible market.

In Denver, light rail served communities have commanded a 15 to 20 percent premium over other nearby houses.

The purple line is about access. As much as we in East Silver Spring would benefit directly from having the purple line through our neighborhood, transit dependent neighbors in lower income areas like Langley Park would benefit even more.

Some critics say that the purple line must not be built because it could result in higher rents in low income neighborhoods. That's ridiculous logic.

Our region definitely needs good, safe, affordable housing with good services. Housing affordability should not be an excuse to obstruct better

transit service for all. It's time to get the purple line built and give people along this entire 16-mile corridor new choices for how they travel.

Thank you for the opportunity to make comments today.

- RECORD #1274 DETAIL

First Name : Irving
Last Name : Mintzer
Business Name : Silver Spring Advocates
Address : 9514 Garwood Street
City : Silver Spring
State : MD
Zip Code : 20910
Email Address :

Submission Content/Notes : My name is Irving Mintzer, it's I-R-V-I-N-G, my family name is M-I-N-T-Z-E-R. I live at 9514 Garwood Street in Silver Spring where I have lived with my wife and family for 22 years.

I am a senior advisor to the Potomac Energy Fund and an advisor to the U.S. Department of Energy on energy, environment and security issues.

I'm a member of the Silver Spring Advocates and I come here today to speak to you about the importance of encouraging a rapid implementation of the immediate investment alternative of the light rail purple line.

Like many here in Montgomery county and throughout Maryland, I have a strong emotional commitment to the importance of a sustainable environment and an economy that's based on good jobs for Americans.

The light rail alternative to the purple line provides a unique opportunity to promote both good jobs that will pay good salaries to Americans here while building the foundation for a lasting and sustainable economy and a strong and well protected environment.

By investing now in a light rail transit system for Montgomery County, we will position the county for providing high quality transportation services with minimal negative impacts on the environment for decades to come.

Because this variant is electric powered, as the county and the state move to a higher dependence on renewable sources of energy, we won't have to rebuild our transit structure to address the future consequences of fossil fuel use.

By choosing the medium variant of the light rail option for the purple line, we recognize the complex challenges that will face us as a county and as a state in the context of the current financial turbulence in world markets.

It is an alternative that can be built at a manageable price that has a high cost benefit ratio and that will provide a basis for uniting our community and our county with our friends and colleagues in Prince Georges now and for many years to come.

I urge you to look at this alternative favorably, not to get lost in the weeds of the lengths of the left turn lanes or the number of feet of new curbing you have to build, but to think of it in the context of building the kind of infrastructure that our incoming president elect has talked about, an infrastructure that will provide the basis for a strong economy, provide jobs that can't be exported and make our environment an important, positive legacy for our children and grandchildren. Thank you.

- RECORD #2688 DETAIL

First Name :	Darian
Last Name :	Unger
Business Name :	Silver Spring Citizens Advisory Board
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	DARIANUNGER@YAHOO.COM

Submission Content/Notes : Dear Ms. Ratcliff,

Last night, the Silver Spring Citizens Advisory Board unanimously adopted the attached letter, which was written after months of community and MTA meetings about the proposed Purple Line. The text of the letter is also included below, and a hard copy will be sent by regular mail also.

Our board represents the residents of downtown Silver Spring and its neighboring communities. Thank you very much for including our opinion regarding the Purple Line.

Silver Spring Citizens Advisory Board
Silver Spring Regional Center?
8435 Georgia Avenue
Silver Spring, Maryland 20910

Ms. Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

We, the undersigned members of the Silver Spring Citizens Advisory Board, write today to express our unequivocal support for the construction of the Purple Line. By creating an east-west transit project that links communities such as Bethesda, Silver Spring, Langley Park, and College Park, the Purple Line will catalyze continued economic development in each of these communities, ease access to job opportunities throughout this corridor, support transit-oriented development objectives and help to combat continued sprawl, and support the environmental conservation objectives that are the shared values of our Board and indeed of our community. The development of an east-west, suburb-to-suburb link in this corridor that would connect existing spokes of the Metrorail, MARC and Amtrak systems is long overdue and we believe that the State should move to advance the Purple Line through the federal planning and funding processes as quickly as possible.

We want to emphasize the critical need to build the best possible alignment from the start, therefore, the Purple Line should be constructed as a light rail transit system. The advantages of Light Rail Transit (LRT) over Bus Rapid Transit (BRT) include attracting more riders, shorter travel times, shift more automobile trips to transit and therefore would offer a greater reduction of automobile generated air pollution in the corridor, do more to meet accessibility and mobility objectives and would provide the greatest user benefits. According to the Draft Environmental Impact Statement (DEIS), comparing Medium LRT to Medium BRT would generate 62,600 daily boardings compared to 51,800, provide a 9 minute ride compared to 19 minutes from Bethesda to Silver Spring, and provide 19,200 new trips to transit relative to the No Build Alternative, compared to 15,300.

Finally, we encourage the Maryland Transit Administration (MTA), state and county officials to ensure that this project study and evaluate as much tunneling in Silver Spring as is practicable and as can be accommodated without rendering the project uncompetitive under cost effectiveness criteria or reducing the utility of the project. We feel that if done correctly, without limiting user benefit or adding undue impacts to communities, tunneling could offer significant opportunities to move the Purple Line faster through congested areas and neighborhoods to

reduce impacts on traffic, local communities, residential properties and facilities.

As the project moves forward, we strongly encourage the MTA to continue to work to identify and to detail to the communities through which the alignments under consideration would pass the full impacts of these alignments. We are concerned that the DEIS now under consideration is insufficient in its treatment of the impacts of alignments on residential properties and community facilities and amenities – particularly because it does not provide close analysis of the extent of street widening that the various alignments would require -- and we hope that environmental and other impacts on Silver Spring communities and resources such as Sligo Creek Park and the Capital Crescent Trail will be minimized.

We thank you and the staff of the MTA for the work that has been conducted to date on the Purple Line project and stand ready to assist with the continued development of this project in any way possible. We stand ready to assist in working together to maximize the benefits and minimize the impacts to downtown Silver Spring and its many communities that will be served by Purple Line light rail.

Sincerely,

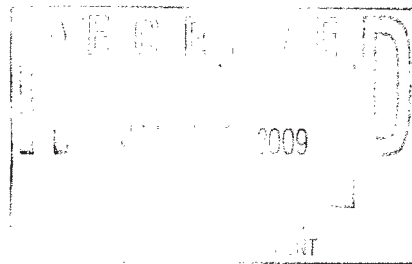
Darian Unger
Chairman, Silver Spring Citizens Advisory Board
Silver Spring Citizens Advisory Board.pdf (83 kb)

Attachments :



SILVER SPRING CITIZENS ADVISORY BOARD

January 13, 2009



Ms. Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

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Ms. Ratcliff
January 13, 2009
Page 2

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Sincerely,

A handwritten signature in black ink, appearing to read 'D. Unger', with a large, stylized initial 'D' and a long, sweeping horizontal stroke extending to the right.

Darian Unger
Chairman

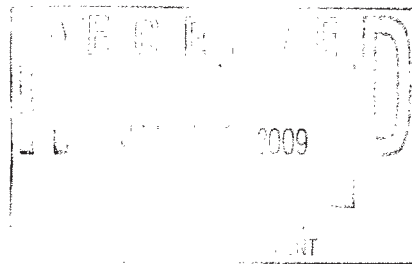
- RECORD #2109 DETAIL

First Name : Darian
Last Name : Unger
Business Name : Silver Spring Citizens Advisory Board
Address : 8435 Georgia Avenue
City : Silver Spring
State : MD
Zip Code : 20910
Email Address :
Submission Content/Notes :
Attachments : Silver Spring Citizens Advisory Board.pdf (83 kb)



SILVER SPRING CITIZENS ADVISORY BOARD

January 13, 2009



Ms. Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

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Ms. Ratcliff
January 13, 2009
Page 2

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We thank you and the staff of the MTA for the work that has been conducted to date on the Purple Line project and stand ready to assist with the continued development of this project in any way possible. We stand ready to assist in working together to maximize the benefits and minimize the impacts to downtown Silver Spring and its many communities that will be served by Purple Line light rail.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Unger', with a large, stylized initial 'D'.

Darian Unger
Chairman

- RECORD #2339 DETAIL

First Name :	Jon
Last Name :	Lourie
Business Name :	Silver Spring Urban District Advisory Committee
Address :	8435 Georgia Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	
Submission Content/Notes :	
Attachments :	SS Urban District Advisory Committee.pdf (126 kb)



SILVER SPRING URBAN DISTRICT ADVISORY COMMITTEE

December 8, 2008

The Honorable Martin O'Malley
Governor, State of Maryland
100 State Circle
Annapolis, MD 21401-1925

Dear Mr. O'Malley:

The Silver Spring Urban District Advisory Committee has been monitoring the efforts of the Maryland Transit Administration (MTA) to develop plans for a Purple Line that will provide transit services from Bethesda to New Carrollton passing through downtown Silver Spring. We have had several briefings by MTA. **The SSUDAC is strongly in support of the Medium Investment Light Rail (LRT).**

The Purple Line with the LRT option would do more for the future of downtown Silver Spring and the Silver Spring community by:

- Increasing ridership;
- Providing positive economic development impact;
- Enhancing access to downtown Silver Spring;
- Providing greater connectivity to the region and important destinations such as downtown Bethesda and the University of Maryland;
- Significantly reducing future traffic in downtown Silver Spring;
- Reducing vehicular emissions and providing a green alternative to buses;
- Providing the most cost effective option; and
- Greater transit capacity.

The Medium Investment Option will allow for stations to be located in and close to downtown Silver Spring. In particular, a station at the new Silver Spring Library site would provide access to both the core area of downtown as well as the Fenton Village area to the south, encouraging the redevelopment of this area. The High Option with its expensive underground tunnels and limited stations would bypass downtown Silver Spring.

Mr. O'Malley
December 8, 2008
Page 2

The Silver Spring Urban District Advisory Committee would respectfully encourage you to chose the Medium Investment LRT option as the locally preferred alternative and do everything to help move this transit project forward. It is critical to the future of Silver Spring, Montgomery County and the State of Maryland.

Sincerely,



Jon Lourie
Chair

cc:
Isiah Leggett, Montgomery County Executive
John D. Porcari, Maryland Secretary of Transportation
Mike Madden, Maryland Transit Administration

- RECORD #1164 DETAIL

First Name : Jorge

Last Name : Sactic

Business Name : Small Businesses in Langley Park

Address : 1401 University Boulevard

City : Hyattsville

State : MD

Zip Code : 20783

Email Address :

Submission Content/Notes : Good evening. My name is Jorge Sactic. George, J-O-R-G-E, last name Sactic, S-A-C-T-I-C.

I'm here representing the small businesses of the Langley Park area. Currently I am the (inaudible) Association of (inaudible) located on University Boulevard between Riggs and New Hampshire Avenue.

We are the ones to (inaudible) about the new changes that (inaudible) to the community. We consider the new cosmetic changes that will take place will increase housing and it will be (inaudible) to afford.

Small businesses are concerned because (inaudible) away from the area because of the high cost and then (inaudible) because they are our customers. So basically my area of business is established in this area for those items (inaudible) that is specific served this community.

So we would like to know if within your program you can include prohibitions to include us, both community and small business. It is (inaudible) for us.

What I can tell you is that members of the community and members of the small businesses are very worried about it. We note that the corporations are going to be present in the area.

We feel that we have been in the area for many years in a county we should have been (inaudible) we have been paying taxes, the community has been (inaudible) on these businesses, not only minority business but (inaudible) and we have been here for so long (inaudible) we are still hanging n there. I think that (inaudible) positive and (inaudible) just come in and drive us away. So that's (inaudible) I hope you take that into consideration. Thank you very much.

- RECORD #1259 DETAIL

First Name : Evan
Last Name : Glass
Business Name : South Silver Spring Neighborhood Association
Address : 7915 Eastern Avenue
City : Silver Spring
State : MD
Zip Code : 20910
Email Address :

Submission Content/Notes : My name is Evan Glass, E-V-A-N, G-L-A-S-S. I am President of the South Silver Spring Neighborhood Association located right across the street, Georgia Avenue, a stone's throw distance from here.

We are a burgeoning community that embraces smart growth principle. Most of us take the Metro rail and Metro buses to work, mostly in Washington, DC and those, my neighbors who drive, basically do so on the east/west corridor, mainly from Bethesda to College Park. A future purple line would help get them off the roads as well.

We have heard the facts over the last few hours as to why we need a purple line and many people have stated that they prefer the light rail line.

I think the most important factor we need to look at here is the expected ridership numbers and the time it takes to travel on this purple line.

What we need to do and what we should do is get most people out of their vehicles and I think the light rail option does that the best.

We cannot forget the history of transportation decisions in the Washington, DC area. There has been an over-reliance on automobiles and communities successfully fight in Metro rail stations more than 25 years ago, and now they are saddled in traffic. We cannot repeat these decisions.

Basically environmental and socioeconomic benefits are clear that we need a purple line for a myriad of reasons. But again, the goal that we should be looking at and striving for is to help get people moving throughout our communities, Prince George's County, Montgomery County and the larger DC area, and to help reduce vehicular traffic.

The studies that have been provided show that the light rail options do that the best. Thank you.

- RECORD #762 DETAIL

First Name : Rachel
Last Name : Sylvan
Business Name : South Silver Spring Neighborhood Association
Address : 7981 Eastern Avenue
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : rfsylvan@gmail.com
Submission Content/Notes : Dear Mr. Madden,

I strongly encourage MTA to do everything it can to build the Light Rail Purple Line as soon as possible.

Thank you.

Rachel Fineberg Sylvan

- RECORD #1161 DETAIL

First Name :	Robert
Last Name :	Rosenberg
Business Name :	SSTOP
Address :	741 Silver Spring Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Robert Rosenberg, R-O-B-E-R-T, R-O-S-E-N-B-E-R-G. Hello, everyone. My name is Robert Rosenberg, and I'm a founding member of SSTOP, the community advocacy group representing the concerns of East Silver Spring residents who are impacted by the Silver Spring/Thayer Avenue alignment.

For full disclosure, I'm also a member of the Purple Line Montgomery County Master Plan Advisory Group, though I'm not here to speak on behalf of this organization.

My mission today is to make clear and make sure that the problems and concerns of the Silver Spring, the residents that are impacted by the Silver Spring/Thayer Avenue alignment are put into the record.

It is important to have a little bit of historical context as to the selection of the Silver Spring/Thayer Avenue alignment. The basis for its consideration was a misnomer.

The original alignments of Sligo and Wayne Avenue were meeting resistance in the MTA incorrectly assumed right-of-way existed on the private properties between Silver Spring and Thayer Avenue where the alignment was placed.

There was no right-of-way at the time then and there is no right-of-way now. The momentum created by this misunderstanding and the need for another alternative led to this alignment.

Therefore, this alignment was never based on an accurate fact base and/or the efficacy of the route. All this has done is created a red herring that has threatened to damage the community and if selected would result in the largest number of individual lot takings of any of the alignments through East Silver Spring.

According to the DEIS, this alignment would also result in the most significant impacts of any of the Silver Spring alignments.

This fact has been openly discussed by members of the MTA. Not only in terms of the taking of private properties, but also by far the largest amount of public parkland.

Interestingly, the parkland that would be taken has blossomed over the last few years through a unique partnership between the local community and county.

The county has invested a significant amount of money over the last year in this effort, all of which would be wasted if this alignment was implemented.

Other impacts caused by this alignment would include a destructive fly over and a tunnel portal opening up right at East Silver Spring Elementary School in front of a crossing where there are approximately 75 daily children crossings.

I would also like to point out that the Silver Spring/Thayer Avenue alignment has been either woefully understudied relative to the other alignments or the information has not been fully presented in the DEIS.

Unlike for the other alignments, key issues such as station to station travel times, daily boardings, key peak hour intersection levels and noise analyses are not discussed for the Silver Spring/Thayer Avenue alignment.

For the MTA to even remotely consider using the Silver Spring/Thayer Avenue as a serious alternative or even as a design option, these analyses as well as others must be fully completed with a public comment period.

More details will be submitted in writing. Thank you.

- RECORD #665 DETAIL

First Name :	Neal
Last Name :	Teague
Business Name :	Takoma/Langley Crossroads Development Authority
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	
Attachments :	PurpleLineTestimonyNovember22.teague.pdf (10 kb)

Purple Line Testimony – November 22, 2008
Speaker #25

My name is Neel Teague and I am President of the Takoma/Langley Crossroads Development Authority, a business association.

The CDA represents the 175 businesses and property owners in Takoma Park at the intersection of University Boulevard and New Hampshire Avenue.

Our organization works closely with the businesses and property owners in the larger area known as Maryland's International Corridor, from Long Branch in Montgomery County to our neighbors in Prince George's County right at the T/L Crossroads, and on to University and Riggs and the Univ of Maryland.

Our businesses serve the vibrant international community in the Takoma/Langley Crossroads and also offer specialized goods and services that attract customers from throughout the region.

The CDA strongly supports the medium light rail option for the Purple Line with planned stations at University Boulevard and New Hampshire Avenue and at University Boulevard and Riggs Road.

The Takoma/Langley Crossroads sits at the border between Montgomery and Prince George's counties (and Takoma Park) and is a vital link between the counties. This link will be greatly reinforced by the improved east/west access that medium LRT will bring.

Our customers and employees in the surrounding residential communities are already heavy transit users and we have no doubt that they will embrace the superior service that LRT can offer. They need the improved access that LRT will bring to enable them to get to jobs and education so they can continue to improve their lives and their economic prospects right here in their community.

Most of the properties in the area were developed between 40 and 60 years ago when this area was the outer edge of suburban growth and America's post-World War II romance with the automobile was just beginning. While still economically viable, these properties are nearing the end of their useful life and will be ready for redevelopment soon.

The CDA has supported improvements that make an otherwise automobile-oriented area more pedestrian and transit friendly, including:

- decorative sidewalk paving and crosswalks
- bus shelters and benches
- most recently \$7 million in pedestrian safety improvements including signals, crosswalks, and median fencing;

- the proposed Takoma/Langley Transit Center;

however, none of these have changed the fundamental automobile-oriented character of the current development pattern. LRT has the potential to do that - BRT does not.

Our property owners and businesses have embraced the possibilities of redevelopment in Transit Oriented Development that the Purple Line could stimulate. We are working closely with MTA and MNCPPC Sector Planning teams to develop new Sector Plans for the future that could take full advantage of the additional customers that the Purple Line would bring, while maintaining the viability of existing improvements until redevelopment occurs.

In our judgment, only medium LRT offers the possibility of stimulating this kind of redevelopment. BRT will not bring enough additional ridership to support redevelopment in TOD – too few riders, too many cars. Also, the improved tax base from higher density redevelopment will generate a return on the increased investment in LRT versus BRT.

In summary, construction of the Purple Line in the medium LRT option is an historic opportunity to renew and revitalize a developed suburban community rather than consigning it to a cycle of decline and inducing more loss of open space to continued urban sprawl.

We urge the State of Maryland to choose the medium light rail alternative and proceed with full funding and construction from Bethesda to New Carrollton as soon as possible. We look forward to the working the transportation and planning agencies to make this project a reality.

Thank you.

- RECORD #1248 DETAIL

First Name :	Neel
Last Name :	Teague, President
Business Name :	Takoma/ LangleyPark Crossroads Dev Auth Incorporated
Address :	7676 New Hampshire Drive
City :	Takoma Park
State :	MD
Zip Code :	20912
Email Address :	

Submission Content/Notes : Neel Teague, that's N-E- E-L, T-E-A-G-U-E. My name is Neel Teague. I am President of the Takoma Langley Crossroads Development Authority, a business association.

The CDA represents 175 businesses and property owners in Takoma Park at the intersection of University Boulevard and New Hampshire Avenue.

Our organization works closely with the businesses and property owners in the larger area known as Maryland's International Corridor from Long Branch in Montgomery County to our neighbors in Prince George's County right up the Takoma Langley Crossroads and onto University and Riggs and the University of Maryland.

Our businesses serve a vibrant international community in the Takoma/Langley Crossroads and also offers specialized goods and services that attract customers from throughout the region.

The CDA strongly supports the medium light rail option for the purple line with stops at the New Hampshire and University Boulevard intersections and the Riggs Road at University Boulevard intersections.

The Takoma/Langley Crossroads sits at the border of Montgomery County and Prince George's County and Takoma Park and is a vital link between the counties.

This link will be greatly reinforced by the improved east/west access that medium light rail will bring.

Our customers and employees in the surrounding residential communities are already heavy transit users and we have no doubt they will embrace the superior service that light rail transit can offer.

They need the improved access that LRT will bring to enable them to get to jobs and education so that they can continue to improve their prospects and their lives right here in their own community.

Most of the properties in the area were developed between 40 and 60 years ago when this area was the outer edge of suburban growth and the post World War II romance with the automobile was just beginning.

While economically viable, these properties are near the end of their useful life and will be ready for redevelopment soon.

The CDA has supported improvements that make an otherwise automobile oriented area more pedestrian and transit friendly, including decorative sidewalk paving and crosswalks, bus shelters and benches. Most recently a \$7 million pedestrian safety improvement program including signals, cross rocks and medium fencing in the proposed Takoma/Langley transit center.

However, none of these will have, have changed the fundamental automobile oriented character of the crossroads that LRT has the potential to do and bus rapid transit does not have the potential to do.

Our property owners and businesses embrace the possibilities of redevelopment and transit oriented development that the purple line could stimulate. We are working closely with MTA and Park and Planning sector planning teams to develop sector plans for the future that could take full advantage of additional customers that the purple line could bring.

In our judgement, only medium light rail transit offers the possibility of simulating this kind of development. BRT will not bring enough additional ridership to support redevelopment. Too few riders and too many cars.

In summary, construction of the purple line in the medium light rail transit option is an historic opportunity to renew and revitalize the developed suburban community rather than consigning it to a cycle of decline and inducing more loss of open space to continue urban sprawl. Thank you very much.

- RECORD #1750 DETAIL

First Name :	Neel
Last Name :	Teague
Business Name :	Takoma/Langley Crossroads Development Authority, Inc.,
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	NTEAGUE@STOUTANDTEAGUE.COM

Submission Content/Notes : Ms. Diane Ratcliff, Director of Planning
Maryland Transit Administration

Dear Ms Ratcliff:

Ever since former Governor Parris Glendinning came to the Crossroads to announce the intent to build a Purple Line, the Takoma/Langley Crossroads Development Authority, Inc., (CDA) has fully and enthusiastically supported the idea, knowing that this would not only provide better transportation for the many immigrant families and other workers in this area, but that it would also bring revitalization, badly needed.

The CDA is a business association of 158 property owners and business tenants, located in the tri-jurisdictional intersection of New Hampshire Avenue and University Boulevard. The CDA Operating Board, representing these 158 properties and businesses, has on numerous occasions not only voiced its support for the idea of a medium Light Rail Purple Line using the Master Plan alignment, but has voted this support and has sent letters on more than one occasion to those who make decisions about the possibility of a Purple Line.

This area has an existing base of transit users that will embrace the improved mass transit service that the Purple Line will bring. MTA has already recognized this need in calling for a Transit Center to be located in the Crossroads and funded by contributions from the State, and both Montgomery and Prince George's counties.

If the following planning staff conclusions sound familiar, it is because we and many others support them and they are:

- We support the Purple Line with a major stop in the Crossroads at the intersection of University Boulevard and New Hampshire Avenue, preferably in connection with the proposed Transit Center.
- Only light rail, not bus rapid transit, can carry the heavy passenger loads foreseen.
- Only light rail can support the passenger loads envisioned in the Master Plan revision now under consideration; with appropriate planning and zoning tools to allow for the densities needed stimulate the revitalization of aging commercial properties in the Crossroads.

- The taking of right of way should be minimized to ensure the continued viability of existing properties and businesses.
- It is essential that the Purple Line use the Georgetown Branch alignment between Bethesda and Silver Spring.
- Complete the hiker-biker trail as part of the project, including parallel routes in Bethesda through the Air Rights Tunnel and on Bethesda and Willow Avenues and along an off-road corridor along the CSX right-of-way into the Silver Spring Transit Center, then aim for a 12 foot trail width wherever feasible, since a trail along the tramway will be as popular as the trail west of Bethesda.
- We also support the expedited construction of the Bethesda South Entrance as a priority infrastructure project under the Stimulus program being developed by the incoming Obama administration.

Please encourage Governor O'Malley to get the Light Rail Purple Line into construction on the fastest timeline.

We thank you for considering the opinions of the 158 members of the CDA.

G. Neel Teague,
President

- RECORD #1132 DETAIL

First Name : Sharon
Last Name : Wertz
Business Name : Templeton Knolls Civic Assoc
Address : 5512 Carters Lane
City : Riverdale
State : MD
Zip Code : 20737
Email Address :

Submission Content/Notes : It's S-H-A-R-O-N and it's W-E-R-T-Z. My name is Sharon Wertz. I live at 5512 Carters Lane in Riverdale and I'm with the Templeton Knolls Civic Association. We're 400 homes in behind Riverdale Plaza, which Riverdale Plaza is on Riverdale Road.

We are in support, at Templeton Knolls, of the proposed Purple Line. We don't think today the bus system alone is enough for our citizens today. We feel that this new system being offered to all the citizens there, will offer safer travel and make a real difference in family life.

Think about it. As a mom or a dad may be able to take his or her child to a bus stop before school and than still get to work on time. Have breakfast or whatever.

But one of things that we feel the proposed rail line will be an integral part of the already planned revitalization of the Kenilworth Avenue Corridor. And if I may jump on what Senator Pinsky said in his statement, I would like you to look at the option there on Kenilworth Avenue as it goes up Riverdale Road to New Carrollton. That it be on the high-end, that the High-End Option would be there for this Inner Beltway community, that we go up and over.

We have a much used foot travel path there. We have buses going back and forth. Schools across that corridor and I come through that area in the evenings in my travel every day on the way home from work. I would really like the high-end to be looked at at that particular location, Kenilworth and East West Highway.

Thank you and it's really exciting times and I encourage leadership in the community to think about as this Purple Line could possibly come in. Think about where you're going to put your community centers. Think about your child. They may be able to go to an event if you have community centers planned in and around these areas. So thank you very much.

- RECORD #1695 DETAIL

First Name :	Joy C.
Last Name :	West
Business Name :	TOP Condominium Association
Address :	8528 Geren Road
City :	Silver Spring
State :	MD
Zip Code :	20901
Email Address :	JPCDC12@AOL.COM

Submission Content/Notes : Top of the Park Condominium Association

Purple Line Task Force

December 30, 2009

Diane Ratcliff

MTA Director of Planning

MTA Office and Planning

6 St. Paul Street, 9th Floor

Baltimore, Maryland 21202

Dear Ms. Ratcliff:

Please accept the attached Testimony on the Development of the Purple Line in the Silver Spring Corridor on behalf of the Top of the Park Condominium Association, Purple Line Task Force. TOP is located about 1.5 miles from the Silver Spring downtown Central Business District. It consists of one hundred sixty six (166) 2 to 3 bedroom units. TOP is eighty five percent owner occupied and fifteen percent rental. The demographics of TOP will find a mixed community both racially and socio-economically.

TOP supports the need for sensible transportation solutions for this rapidly growing region, yet urge balance and careful planning given the potential consequences of a project of this nature. TOP's position on the Purple Line may be summarized in four (4) areas as follows.

- Alternative 8 presents troubling issues for TOP in terms of land impacts, traffic patterns, construction structural considerations and delays, emergency evacuation considerations, property value impacts, environmental impacts and criminal activities.
- TOP strongly supports the position of the Montgomery County Planning Department in finding that the Silver Spring Thayer Design Option station and alignment option is unacceptable and be dropped from further consideration.

- TOP supports the need for additional study on the potential impact of tunneling under Wayne and tunneling to Arliss and Flower.
- TOP supports the recommendation that the State better analyze travel demand and other issues on the east side of the line through East Silver Spring and Takoma-Langley.

Thank you for considering the position of TOP. It is our hope to continue to work with transit and County officials as the Purple Line project forges ahead.

Sincerely,

Joy C. West, Esq.

Chair

Purple Line Task Force

TOP Condominium Association

Purple Line Task Force

Testimony on the Development of the Purple Line in the Silver Spring Corridor

December 30, 2008

TOP of the Park Condominiums

Top of the Park (TOP) Condominiums is located about 1.5 miles from the Silver Spring downtown Central Business District (CBD). It consists of one hundred sixty six (166) 2 to 3 bedroom units, swimming pool, 210 off-street parking spaces and a plethora of mature trees, flowers, plants, varied wildlife and exotic birds. TOP is eighty five percent (85%) owner occupied and fifteen percent (15%) rental. It was built in 1941 during post war construction and converted to condominiums in 1980. The units are townhouse style built of red brick in the colonial revival style. The demographics of TOP will find a mixed community both racially and socio-economically. A large number of the residents are long term homeowners in TOP and many of which are at or approaching the age of retirement.

Several transportation options are currently available at TOP. Four (4) Ride On bus lines serve the Takoma Park and Silver Spring Metro Red Line stations. There is quick and easy access to the Capitol Beltway I-495 with entrances at Colesville Road and University Boulevard. There is also easy access to north/south main streets thru-ways (Piney Branch, Georgia Avenue, 14th and 16th Streets) into the District of Columbia. There is parking for those with cars.

TOP is in walking distance (2 blocks) to small commercial retail outlets at Piney Branch Road and Flower Avenue, a major grocery chain, Giant and Best Way grocery store on Piney Branch between Flower Avenue and Arliss. It is a true community in terms of having the Amom and pop@ styled cleaners, dollar store, shoe store, quick stop stores, restaurants, deli, bakery, gas stations, variety of small businesses and Montgomery County liquor store. Its recreational outlets include the Sligo Creek Parkway trail, Long Branch park and other parks along the Sligo Creek Parkway.

In other words it is true when stated that ATOP is a hidden gem in a rapidly growing Montgomery County@. It=s environment is one of peaceful enjoyment. You can hear the breeze in the motion of wind blown trees. You can enjoy the symphony of nature=s song with the exotic species of migratory birds. You absorb the cadence of the cicada=s mating calls on a hot summer=s night as lightning bugs dart in the late dust of the evening sunset. The sounds of traffic and the growth of bustling city over-development is muffled by the majestic trees that have existed in the TOP for hundreds of years. It is truly an environment where you feel you are far away from the urban sprawl that lies just outside the bounds of the TOP.

Purple Line Alternatives

TOP would be most impacted by proposed Alternative 8 in the Purple Line Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS). Alternative 8 presents troubling issues for TOP in terms of land impacts, traffic patterns, construction structural considerations and delays, emergency evacuation considerations, property value impacts, environmental impacts and criminal activities.

TOP strongly supports the position of the Montgomery County Planning Department in finding that the Silver Spring Thayer Design Option station and alignment option is unacceptable. TOP concurs that the Silver Spring-Thayer design option be dropped from further consideration. Additionally, TOP supports the need for additional study on the potential impact of tunneling under Wayne Avenue and tunneling to Arliss and Flower Avenue. Finally, TOP supports the recommendation that the State better analyze travel demand and other issues on the east side of the line through East Silver Spring and Takoma-Langley.

Construction Impact

TOP is located squarely in the proposed development area. As such TOP residents have a vested interest in whatever alternative is ultimately selected. The construction phase of the project will affect the quiet enjoyment of TOP residents due to noise, vibration, air quality, water quality, traffic pattern alterations and utilities. Our call for continued or more intensive studies in particular areas is generated by the drastic impact resulting from construction delays or mishaps, utility disruptions or changed traffic patterns. TOP is one hundred percent (100%) Pepco reliant meaning in the case of power outages there are no lights, heat, air, hot water, stove, refrigeration, etc. Pepco has often experienced difficulties bringing the area back up when there have been power outages.

Constructing a tunnel as proposed would have significant environmental impacts in the area where TOP is located. Many of the negative impacts of tunneling have been noted in the AA/DEIS and TOP supports the need for continued study of this issue. We request to be specifically included in the study area given our proximity to development area and environmental and infrastructure considerations at TOP.

Traffic Impact

Inasmuch as TOP is located at Piney Branch and Manchester and a few blocks from Wayne and Manchester, residents enjoy the benefit of easy access to major transit routes. Although the Silver Spring-Thayer Alternative 8 may be removed from further consideration, for the record it should be noted that the change in traffic patterns at Piney Branch and Manchester would effectively bar left turns from Manchester to Piney Branch (northbound) and from Piney Branch to Manchester (westward). This type of alteration would impact emergency and evacuation options for TOP residents and others in this area. It is recommended that any alterations in traffic patterns in this area be committed to further study.

Property Value Impacts

The possibility of a major transit center at Arliss and Flower Avenue would completely change the character of this quiet and low crime neighborhood. The AA/DEIS noted that this area is characterized by completely developed established neighborhoods. It is also noted that only thirty four percent (34%) of the population uses public transportation in this area. This is an old established neighborhood. Fortunately, there has been no new construction occurring or over development of high rise commercial and residential structures. The area has not seen a significant population or transit growth over the years. The community has remained relatively stable. One of the benefits of living in TOP is the pace and environmental tranquility. The location of the transit center at Arliss and Flower could make TOP a prime location for increase pedestrian traffic, noise, congestion and crime causing residents to suffer a penalty from the nuisance effects of the project. TOP urges continued study on these impacts to the neighborhood.

TOP is a community of homeowners. The potential impact on property values as a result of any development activity in this area is a constant concern. It is our hope that studies are conducted and made available on the impact that the Purple Line will have on area property values both during and after construction.

Conclusion

TOP supports the need for sensible transportation solutions for this rapidly growing region. As residents we support the efficient movement of people, yet urge balance and careful planning given potential environmental consequences. For TOP residents the possibility of a Purple Line has not evoked a class-warfare discussion pitting poorer communities against wealthier neighborhoods as suggested by the Gazette in its December 10, 2008 editorial, Advance the Purple Line. Rather, we are long term homeowners and would not like for our community to be wracked by construction, heavy equipment, noise, drilling, traffic diversions resulting from a project of this size and proportion. Calling for careful study is a responsible approach. Moreso, in light of a Report from Montgomery County's Office of Legislative Oversight that studied county road projects which found the average project took considerable more time to complete than projected. Project delays could have significant consequences for those residing in the project area and should not be taken lightly.

Thank you for receiving these comments of the TOP Condominium Association, Purple Line Task Force. It is our hope to continue to work with transit and County officials as the Purple Line project forges ahead.

TOP Position.pdf (18 kb)

Attachments :

TOP Condominium Association
Purple Line Task Force
Testimony on the Development of the Purple Line in the Silver Spring Corridor
December 30, 2008

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population or transit growth over the years. The community has remained relatively stable. One of the benefits of living in TOP is the pace and environmental tranquility. The location of the transit center at Arliss and Flower could make TOP a prime location for increase pedestrian traffic, noise, congestion and crime causing residents to suffer a penalty from the nuisance effects of the project. TOP urges continued study on these impacts to the neighborhood.

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TOP supports the need for sensible transportation solutions for this rapidly growing region. As residents we support the efficient movement of people, yet urge balance and careful planning given potential environmental consequences. For TOP residents the possibility of a Purple Line has not evoked a class-warfare discussion pitting poorer communities against wealthier neighborhoods as suggested by the Gazette in its December 10, 2008 editorial, Advance the Purple Line. Rather, we are long term homeowners and would not like for our community to be wracked by construction, heavy equipment, noise, drilling, traffic diversions resulting from a project of this size and proportion. Calling for careful study is a responsible approach. Moreso, in light of a Report from Montgomery County's Office of Legislative Oversight that studied county road projects which found the average project took considerable more time to complete than projected. Project delays could have significant consequences for those residing in the project area and should not be taken lightly.

Thank you for receiving these comments of the TOP Condominium Association, Purple Line Task Force. It is our hope to continue to work with transit and County officials as the Purple Line project forges ahead.

Joy C. West, Esq.
Chair
Purple Line Task Force
TOP Condominium Association
8528 Geren Road
Silver Spring, Maryland 20901
301-587-1999

- RECORD #21 DETAIL

First Name : Andrew
Last Name : Friedson
Business Name : UMCP Student Government Association
Address : 168 Stamp Student Union
City : College Park
State : MD
Zip Code : 20742
Email Address : afriedso@umd.edu
Submission Content/Notes : I am the Student Body President at University of Maryland, College Park. I would like to request membership from the Student Government Association on the Purple Line Community Focus Group in College Park/Riverdale. Students represent half of the City's population, yet we have no representation on the council. Please let me know how I can make sure that this occurs. Thank you!

- RECORD #1163 DETAIL

First Name :	Jonathan
Last Name :	Sachs
Business Name :	President, SGA
Address :	4230 Knox Road
City :	College Park
State :	MD
Zip Code :	20740
Email Address :	

Submission Content/Notes : Jonathan Sacks, J-O-N-A-T-H-A-N, last name S-A-C-H-S. I live at 4230 Knox Road in College Park, 10 20740. This year I am serving as the President of the student body at the University of Maryland.

I believe that the purple line gives us a choice between more of the same unsustainable, unreasonable and inconvenient ways to get around or changing the way we view getting around our region and providing fair opportunities for safe and sustainable transportation.

As a student, I understand that this project will be coming right through our campus, but I'm in favor of bringing it into our community.

In fact, support for the purple line on our campus boasts the largest and most diverse student coalition of support for any external issue.

Organizations who have signed on to support the project include all the governance bodies on campus, many of the campus cultural groups including the Black Student Union and Latino Student Union, as well as political and community organizing groups such as Maryperg, Community Roots and the College Democrats.

Students also believe that the purple line should be light rail and built in the correct location on our campus.

The purple line should go on the Campus Drive alignment for several reasons. Campus Drive is the most viable alignment for the growth of our university, and in the university master plan, several of the parking lots close to the middle of campus will be converted into new academic buildings.

As parking spaces are eliminated, commuter students, administrators and faculty will be searching for alternatives to driving to campus.

Transit into the middle of campus is an attractive way to encourage use and get individuals to use convenient and sustainable transportation.

Additionally, the Campus Drive alignment gives the most amount of students on campus the easiest access to light rail transit.

Furthermore, putting the purple line on Campus Drive would not involve building a new road or cutting through any green space. In fact, the layout of the campus will hardly change, and this alignment will preserve the beauty of our campus.

On the question of vibration and electromagnetic interference, EMI, of course it's unfair to ask the science departments to relocate their experiments. However, from what I have seen, there has been no conclusive evidence to show that the impacts of light rail vehicles could not be mitigated by the professors conducting the experiments.

The Prinkert to Chapel Drive alignment on the other end will place light rail in a very dense pedestrian area where there is currently no transit infrastructure.

Building light rail in that location would involve paving a road through one of the oldest parts of campus and introducing transit to a completely pedestrian area.

If the purple line runs in the narrow corridor between the south campus dining hall and the Frac Hall, especially with the eventual renovation of the south campus dining hall to include a gymnasium and a new dining

hall, it would truly ruin the pedestrian friendly area of south campus.

Aesthetically having the purple line run by the memorial chapel will also hurt some of the beauty of our campus, not to mention expose labs on that part of campus to brand new vibration and EMI factors never having any road or any transit infrastructure there in the past.

Finally, ridership numbers are lower on the Prinkert Drive alignment. It costs millions more than Campus Drive and gives fewer students incentive for convenient access to light rail.

In conclusion, I believe that the student body has come together to support this extremely important effort and also supports building light rail on Campus Drive.

For students, the purple line is not just a here and now issue. Students plan to come back to campus on the purple line and enjoy a vibrant and modern campus. There is longevity in support for this project from current students like myself who will be advocating for this project and hopefully using it long after we graduate. Thank you.

- RECORD #2242 DETAIL

First Name : Laura
Last Name : Pinto
Business Name : University Landing Tenant' Association
Address : 1028 University Blvd., Apt #932
City : Silver Spring
State : MD
Zip Code : 20903
Email Address :
Submission Content/Notes :
Attachments : Pinto_Laura.pdf (831 kb)



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Laura Pinto Organization: University Landing Tenants Assoc.
Address: 1028 University Blvd. Apt #932
City: Silver Spring State: MD Zip Code: 20903

I/We wish to submit the following comments on this project: I am in agreement
that this area where I live needs better access to
public transit. I also agree that it would be better to
have a train Purple Line than a bus Purple Line. Before
construction begins, however, we need to have a good
understanding of the impact this development is going to have
with regards to possible rent increases for small business
owners and people who live in apartments. What guarantee
do people like me have that we will not be displaced
as a result of Purple Line development? We support
the project, but we need protections.

- RECORD #3270 DETAIL

First Name :	Vance
Last Name :	Ayers
Business Name :	Washington DC Building and Construction Trades Council
Address :	5829 Allentown Road
City :	Camp Springs
State :	MD
Zip Code :	20746
Email Address :	vayres@dcbuildingtrades.com

Submission Content/Notes : We at the Washington DC Building Trades Council would like to thank you for your support for the Purple Line. As you know, this environmentally-friendly mass transit project has broad support from both Prince George's and Montgomery County's workforce and is critical to our future quality of life. The members of the Washington DC Building Trades Council are writing to request that you continue doing everything in your power to get a light rail Purple Line funded and built without delay.

Now that the U.S. Department of Transportation has reviewed Maryland's application for federal funds and the Maryland Transit Administration is conducting public hearings on the draft environmental impact statement, it is critical that your support for a light rail Purple Line be part of the State's record.

As you know, the Washington DC Building Trades Council represents 30,000 construction workers in Maryland, DC and Virginia. The State of Maryland and its localities along with our members would directly benefit from the Purple Line if you build it with the union building trades and our signatory contractors. We are the best at what we do in the world and everyone that this affects deserves the safest and most well built light rail system they can have. This system will benefit all by shorter commutes and the creation of new jobs and economic development along the proposed route. Transportation experts estimate that 35,000 new jobs are created for every \$1 billion invested in transit.

We represent working people, and like the rest of the labor movement, we know that the Purple Line will be a great asset for our members, other working families, and all communities. For too long the working class citizens of Montgomery and Prince George's County have taken multiple buses to access the job centers in College Park, Silver Spring, Rockville, and Bethesda.

A light rail Purple Line will not only encourage economic growth by linking the regions major job centers, but will greatly reduce travel times and provide transportation equity by offering working-class and service workers the same type of transit options long available to many areas of Prince George's and Montgomery County.

Again, we strongly urge that you support a light rail Purple Line to improve the lives of our members today and into the future. As the project moves into

this
critical phase, please do everything in your power to ensure that the
project
wins federal funding and is built by union members without delay.

Attachments :

Ayres 34922.pdf (115 kb)

**Office of THE GOVERNOR'S OFFICE
MAIL FORM**

INSTRUCTIONS: Please investigate the attached and take whatever action is necessary to respond to our constituent's concerns. When completed, please forward the response, the original letter and back-up to the unit indicated below. Also, if there are any questions as to how to respond, please call the unit listed below.

Letter ID: 487255
Receive Date:
Letter Date: 12/17/2008
Deadline Date: 1/19/2009

From:
Vance Ayres
5829 Allentown Road
Camp Springs ,MD 20746

Subject: MDOT - Purple Line Supports purple line.

History Log:

Date Completed	Action Taken	Completed By	Assigned By
12/18/2008 09:17:12 AM	Correspondence Entry	Executive Services: Ja'Nai Keith	Executive Services: Ja'Nai Keith
12/18/2008 09:21:29 AM	Subject Entry	Executive Services: Ja'Nai Keith	Executive Services: Ja'Nai Keith
12/18/2008 09:21:35 AM	Delegated	Executive Services: Ja'Nai Keith	Executive Services: Ja'Nai Keith

RE-DIRECT INFORMATION

If the response to this correspondence should be handled by another agency, please complete the following information and forward the completed form and the correspondence to the proper agency. Also, copy the completed form and send the copy to the unit indicated above.

Re-directed to: _____

Date: _____



ypFrom: Vance [vayres@dcbuildingtrades.com]
Sent: Wednesday, December 17, 2008 9:15 AM
To: Governor
Subject: concerned citizens- purple line

Dear Governor O'Malley,

We at the Washington DC Building Trades Council would like to thank you for your support for the Purple Line. As you know, this environmentally-friendly mass transit project has broad support from both Prince George's and Montgomery County's workforce and is critical to our future quality of life. The members of the Washington DC Building Trades Council are writing to request that you continue doing everything in your power to get a light rail Purple Line funded and built without delay.

Now that the U.S. Department of Transportation has reviewed Maryland's application for federal funds and the Maryland Transit Administration is conducting public hearings on the draft environmental impact statement, it is critical that your support for a light rail Purple Line be part of the State's record.

As you know, the Washington DC Building Trades Council represents 30,000 construction workers in Maryland, DC and Virginia. The State of Maryland and it's localities along with our members would directly benefit from the Purple Line if you build it with the union building trades and our signatory contractors. We are the best at what we do in the world and everyone that this affects deserves the safest and most well built light rail system they can have. This system will benefit all by shorter commutes and the creation of new jobs and economic development along the proposed route. Transportation experts estimate that 35,000 new jobs are created for every \$1 billion invested in transit.

We represent working people, and like the rest of the labor movement, we know that the Purple Line will be a great asset for our members, other working families, and all communities. For too long the working class citizens of Montgomery and Prince George's County have taken multiple buses to access the job centers in College Park, Silver Spring, Rockville, and Bethesda.

A light rail Purple Line will not only encourage economic growth by linking the regions major job centers, but will greatly reduce travel times and provide transportation equity by offering working-class and service workers the same type of transit options long available to many areas of Prince George's and Montgomery County.

Again, we strongly urge that you support a light rail Purple Line to improve the lives of our members today and into the future. As the project moves into this critical phase, please do everything in your power to ensure that the project wins federal funding and is built by union members without delay.

Sincerely,

Vance T. Ayres, Executive Secretary Treasurer
Washington, DC Building and Construction Trades Council
5829 Allentown Road
Camp Springs, MD 20746

T 301 899-8134

F 301 899-8187

C 240 533-7625



- RECORD #1135 DETAIL

First Name : Suchitra
Last Name : Balacaudran
Business Name : West College Park Citizens Association
Address : 9320 St. Andres
City : College Park
State : MD
Zip Code : 20740

Email Address :

Submission Content/Notes : Hi, I'm. I'm the President of the West College Park Citizens S-U-C-H-I-T-R-A is the first name. Last name is B-A-L-A-C-H-A-N-D-R-A-N.

The West College Park Citizens Association is a strong supporter of the purple line. We have passed the purple line resolution and I'm here to state unequivocally that we would really like to see the purple line up and running through the center of campus as I'm now glad the alignment is now going to be with the stop on East Campus.

But I'm really here to say more than the fact that we should support the purple line. I'm here to point out the stark reality on the ground.

In September, the Consolidated Transportation Plan which is a budget that the state has from 2009 to 2014 was \$10.5 billion until the state announced a \$1.1 billion cut in the budget and brought it down to \$9.4 billion because we don't have the money.

Just yesterday the Chief Policy Analyst of the Maryland Legislative Services pointed out that our revenue forecasts are below what we expect and that the consolidated transportation plan will now be somewhere around \$6.9 billion for the next six years.

So this is the stark reality of the ground and the question I would like to ask is not whether or not the purple line is going to come but to show us how we are going to get from where we are to where we need to be and to fund the purple line.

This is a question not just for you but for everybody in the audience to pay attention to. We have in the Consolidated Transportation Plan a big white elephant that is known as the intercounty connector which is eating up a lot of our funds and this is the expense of transit.

So I'm here as a strong transit advocate to point out that if we do not look at the budget and if we do not look at the projects we need to cut, we're never going to get to where we want to get to.

Maryland has the third largest coastline in the United States. Climate change faces us and we've had a climate commission appointed by the governor to look into what we need to do to reduce our carbon dioxide emissions.

Forty percent of the carbon dioxide that we have comes from transportation and the only way we can reduce that is to have people get out of their cars and into transit. This is the absolute wrong time to build a highway. This is the right time to build transit. So I'll end my statement there. Thank you.

- RECORD #1128 DETAIL

First Name : Lee
Last Name : Rowe
Business Name : West Lanham Hills Citizens Association
Address : 7744 Decatur Road
City : Hyattsville
State : MD
Zip Code : 20784
Email Address :

Submission Content/Notes : Good afternoon. My name is Lee Rowe, L-E-E R-O-W-E. I'm the President of the West Lanham Hills Citizens Association, in which West Lanham Hills directly abuts Ellin Road and is right across from the New Carrollton Metro. So the Purple Line would have a direct effect on our community. In fact, my house is facing Ellin Road which is one of the roads that might be taken for the Purple Line.

Needless to say, that we prefer the Harkin Road Route. It's a little bit farther away from our community. But the main concern is the impact, not only a final result of a Purple Line but also the construction of the Purple Line would have on our community.

My chief fear is sort of the languishing of the construction process in which we would see orange cones or barrels there month after month after month, which would directly impact the people in our neighborhood. So we're hoping that, and we are appreciative of the fact that you have taken our concerns in to account in your studies and your reports.

We hope that you'll continue to do that and that the final result when it is eventually finished, of course, will be more pedestrian traffic and other traffic and we are hoping that the State and the County, and we've been working with the County on the Transit Development Overlay Zone which also will effect us, to make sure that safety and security measures are taken proactively rather than after the fact.

So again our main concern in West Lanham Hills is just the impact it would have on our community. Not only in the construction phase but in the final phase and that we're hoping that officials, elected and otherwise, will take proactive measures so that any impacts will be mitigated, minimized, and that we can continue on.

We have no particular position on whether we support or oppose the Purple Line. But we are, again, concerned about its effect on our community and certainly those properties that are next to the proposed routes, whether they be Ellin Road or on 450 or Harkin Road as well.

But I do want to thank you again for taking our concerns in to consideration at the past hearings and for this hearing as well. I also want to thank you for publicizing the hearings and making sure that you do get our input. Thank you.

- RECORD #1134 DETAIL

First Name :	Casey
Last Name :	Anderson
Business Name :	Woodside Civic Association
Address :	8730 1st Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	240.472.0311

Submission Content/Notes : I'm Casey Anderson. My first name is spelled C-A-S-E-Y, like Casey at Bat. My last name is Anderson, A-N-D-E-R- S-O-N. I live in Silver Spring.

I want to say first thank you to Mike Madden. I don't know the rest of these panelists, but you are a true professional. I really admire your grace under pressure in this whole process.

I know it hasn't been easy walking into places like Bethesda and Chevy Chase during this process and you have done a great job. It has been noticed.

I know Moe Eudahl once said that everything that can be said has already been said, but not everybody has had a chance to say it. I'm going to try to at least package these arguments and put them together in a way that you haven't heard before.

I know that at the hearing last night at 4H, you heard probably that WABA, the bicyclist association, Montgomery Bicycle Advocates and Coalition for the Capital Crescent Trail have all recently issued statements in which they flatly reject the arguments that have been advanced by opponents of the purple line suggesting that the purple line and one or more of its configurations would be damaging to the trail.

There is not a single organization that was not expressly organized for the purpose of opposing the purple line that has embraced the argument that the purple line would hurt the trail.

In fact, the WABA statement as well as the Montgomery Bicycle Advocates statements are very interesting because they point out the ways in which the purple line particularly in the medium and heavy rail investment configurations would actually improve the trail by separating it from at-grade crossings at places like Connecticut Avenue at 16th Street, at Jones Bridge Road, places which right now are too dangerous to allow your children to use the trail right now.

So the first point is the Woodside Civic Association which I represent believes that the purple line, particularly the light rail higher investment options would be a vast improvement to the trail. Not only for using the trail into Bethesda and ultimately south into the District of Columbia, but also across 16th Street, for example, and allow children to be able to have safer access to local destinations which are adjacent to the trail like Woodland Elementary School where my 8- year-old attends.

The second reason that the Woodside Civic Association supports the light rail option in particular is because it provides safe and efficient access not only to Bethesda, to the restaurant district, to entertainment and recreation options along the trail and in the Bethesda Central Business District, but also because it allows us to get to events in College Park here at the University of Maryland in a way that's convenient and doesn't require access to an automobile where you'll be stuck in traffic endlessly and have to find a parking space.

We particularly endorse everything that Harry Sanders just told you about travel times. Remember, time actually is money and while you haven't quantified it in the EIS, you could impute the prevailing wage rate in this area to calculate the lost dollars that are caused by people being delayed on a slower, lower investment bus routing or even lower investment rail option.

We think that militates strongly in favor of a heavier investment in rail. Thanks very much for your attention.

- RECORD #1685 DETAIL

First Name :	Casey
Last Name :	Anderson
Business Name :	Woodside Civic Association
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	caseybanderson@aol.com

Submission Content/Notes : Comments of Woodside Civic Association in Support of Light Rail Purple Line

The Woodside Civic Association strongly supports the light rail alternatives described in the Purple Line Draft Environmental Impact Statement (DEIS), particularly the “medium” and “heavy” investment options. WCA members have twice voted unanimously (in 2003 and 2008) to support joint use of the Georgetown Branch right-of-way for a light rail line and trail. WCA believes that completion of the Purple Line and Capital Crescent Trail (CCT) should be the number one transit priority for the state.

WCA represents homeowners and tenants living along the CSX right of way and between Spring Street, 16th Street and Georgia Avenue, an area immediately abutting the proposed Purple Line route and the CCT. As representatives of residents whose neighborhood will be directly affected by the Purple Line and CCT, we see this project as offering enormous benefits, including:

Faster and easier access to destinations along the Purple Line route. The Purple Line will provide quick and convenient transit connections to events at the University of Maryland in College Park, to restaurants in Bethesda, and to other destinations along the proposed route. Woodside residents look forward to being able to take advantage of these amenities without the expense and difficulty of driving and parking. By connecting the two ends of Metro’s Red Line, the Purple Line also will cut travel times from Woodside to Rockville, Friendship Heights and many other destinations.

Reduced traffic congestion in Silver Spring. The Purple Line will help to mitigate the amount of automobile traffic generated by the revitalization of downtown Silver Spring, protecting the quality of life in Woodside and other nearby neighborhoods.

Completion and improvement of the Capital Crescent Trail. Construction of the medium or heavy investment light rail options will make the CCT safer and more accessible by creating grade-separated crossings of several busy intersections, including Connecticut Avenue, Jones Bridge Road, 16th Street, and Colesville Road. The intersection at 16th Street is especially important to Woodside as the Purple Line will allow for safe crossings by children walking or riding their bicycles to Woodlin Elementary School.

The Purple Line also will allow for completion of the long-delayed permanent section of the CCT from Stewart Avenue to the new Silver Spring Transit Center. This segment will give walkers and bicyclists an off-street path from Bethesda to downtown Silver Spring and ultimately to the terminus of the Metropolitan Branch Trail near Union Station in the District of Columbia.

For all of these reasons, WCA submits that the Purple Line will improve

the quality of life in our neighborhood and in the other communities along its route. We urge the state and county to move forward quickly to complete this vital project.

- RECORD #1238 DETAIL

First Name :	Barbara
Last Name :	Ditzler
Business Name :	President, Woodside Park Civic Assoc
Address :	1225 Moyes Drive
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Barbara, B-A-R-B-A-R-A, Ditzler, D-I-T-Z-L-E-R. I live in Silver Spring and I am President of the Woodside Park Civic Association. Woodside Park is a community of 650 homes that adjoins downtown Silver Spring immediately to the north.

Our civic association met in May to learn details about the purple line. The overwhelming consensus at that meeting was in favor of a light rail option with a route directly linked to downtown Bethesda.

So why are we in favor of the light rail purple line? It means relying less on a car as it offers the opportunity to ride to Bethesda in nine minutes, to College Park campus in 25 minutes.

This holds great appeal to us for our jobs, for our doctor's appointments, for our classes, lectures, concerns, libraries, sports, restaurants and entertainment.

We can hop on the purple line, go to New Carrollton in 50 minutes, thereby connecting to the Amtrak. Another great resource.

By connecting the Metro stops in the east/west route, the destination opportunities are abounding.

The purple line will enable an extended bicycle path to be built, replacing the current patchwork trail with so much street use. The families will be able to bike safely for leisure enjoyment and commuters will appreciate a healthy way and safe way to bike to work.

I look forward to weekend rides during the week when I need to go to my league meetings, I'll be able to hop on for the ride. I'll be able to begin in Silver Spring, I'll be able to continue on to many communities along the trails that entail minimal street crossing, less traffic, a safer route.

By boarding a light rail train, we can ride into the future. We will have more environmentally friendly methods of transportation.

Using rail permits clean electricity to fuel the system and the tracks laid on that permeable surface for better water conservancy.

Taking many cars off the road with this alternative transportation is an efficient and clean method and it makes my neighborhood and other neighborhoods more livable. We are taking the cars off the road.

Our son lives in San Francisco. He has light rail running directly in front of his house. Not only does it make it a desirable place for him, it makes an ideal place for others like parents visiting obviously.

It is a very positive place, having the rails running directly in front of his house.

This summer we visited Sagreb, Croatia. There we saw a very large and busy light rail system. We saw pre-World War II rail cars that operated alongside the sleek, quiet, modern ones.

Pedestrians and rail mixed freely on the streets with cars. They could blend together in an efficient, pedestrian-friendly system. This is what Silver Spring can be for the light rail system.

The purple light rail system is a green ticket and I will happily hop aboard.

- RECORD #2866 DETAIL

First Name : Greg
Last Name : Fuhs
Business Name : World Resources Institute
Address : 10 G Street, NE Suite 800
City : Washington
State : DC
Zip Code : 20002
Email Address : GFUHS@WRI.ORG
Submission Content/Notes : Dear MTA Purple Line Team,

On behalf of the World Resources Institute, please accept our submission of the attached comments on the Purple Line AA/DEIS. Thank you for the opportunity to provide feedback, and please don't hesitate to contact me if you have any questions.

Attachments : World Resources Institute.pdf (246 kb)

Public Comments on the Purple Line AA/DEIS

Submission by World Resources Institute, 10 G Street NE, Washington DC 20002

Key Findings and Recommendations

Findings:

- 1) WRI's sensitivity analysis of estimated costs and ridership for the various Purple Line options finds that Medium Investment Bus Rapid Transit (BRT) is the most cost-effective and lowest-risk build alternative.
- 2) WRI's assessment of carbon dioxide (CO₂) emissions projections confirms that Medium and High Investment BRT are the only alternatives likely to reduce CO₂ emissions from the No Build scenario.
- 3) Despite its public popularity, WRI concludes that the Light Rail Transit (LRT) option is less robust, as our analysis shows that it will increase CO₂ emissions and very likely overrun current cost projections.

Recommendations:

- 1) WRI supports a transit investment in the proposed east-west corridor, and argues that the No Build and Transportation System Management alternatives are inadequate to address the congestion problem at hand.
- 2) WRI recommends the Medium Investment BRT option based on our findings on cost-effectiveness and CO₂ emissions benefits.
- 3) WRI believes that the inputs used to forecast greenhouse gas emissions by the AA/DEIS need to be improved before a final decision is made. (For example, we recommend revisiting the choice of emissions factors, type of fleet, and occupancy).



Introduction

About WRI

WRI is a nonpartisan environmental think tank based in Washington DC. Our staff of 160 works on a broad array of environment and sustainable development issues worldwide, providing peer-reviewed research and analysis and working with a wide range of partners to find practical solutions to some of our world's most pressing problems.

WRI has a goal to promote socially, financially, and environmentally sustainable transportation solutions based on well-informed and participative decision-making processes. With this in mind, we believe that a comprehensive impact assessment of proposed transport projects is critical to the decision-making process.

The World Resources Institute (WRI) appreciates the opportunity to comment on the Purple Line Alternatives Analysis / Draft Environmental Impact Statement (AA/DEIS). We commend MTA for striving to undertake such an assessment through the AA/DEIS, and for working to ensure an extensive and open public participation process. Our experience indicates that incorporating public input into decision making will likely lead to better outcomes for the project under consideration.

We are submitting these comments on the AA/DEIS for two primary reasons. First, as a local organization with many staff living near the proposed route, we have a direct stake in seeing the best possible alternative selected. Second, we have significant experience analyzing and implementing sustainable transit solutions around the world, and wish to bring our expertise to bear on this important local issue. While we have not joined any particular group or coalition either supporting or opposing the Purple Line project, we have consulted with a diverse group of stakeholders to gather information and insights on the project, and we have assessed key elements of the AA/DEIS with a commitment to objectivity and analytical rigor. In accordance with WRI policy, this document has been peer-reviewed prior to submission.

We have elected to focus on the following areas where we believe we can add the most value:

- 1) A general review of the merits of building robust, sustainable mass transit alternatives.
- 2) A sensitivity analysis of cost and ridership projections in the AA/DEIS.
- 3) An evaluation of the AA/DEIS's emissions projections for carbon dioxide, the primary greenhouse gas.

We expect that other stakeholders will comment on additional important concerns about the proposed system, such as whether to tunnel under downtown Silver Spring and Wayne Avenue or how best to preserve the Capital Crescent Trail. While we defer to these local communities on the best way to resolve these concerns, based on our discussions with stakeholders it appears that these issues have not yet been fully addressed. Thus we encourage MTA to continue working with the affected communities—even after selection of the locally preferred alternative—to find satisfactory solutions.

Our Region's Sustainable Transportation Imperative

The Purple Line initiative offers the Washington DC Metropolitan Area the opportunity to take a national lead in providing 21st century solutions to the decades-old problems of traffic congestion and associated pollution. At a time when clean energy and fuels are a major and growing policy concern, both nationally and at the state level, we have an opportunity to improve outdated transport infrastructure, provide better transit options for the traveling public, and reduce our region's impact on global warming.

Major capital projects implemented in the near-term will shape the long-term future of transport in the region. WRI urges regional planners and other decision makers to consider current needs and concerns in the context of tomorrow's transportation challenges, especially regarding traffic congestion, fuel costs, and climate change.

Cities across the United States face similar challenges in updating transportation infrastructure, and those that develop cost-effective transport systems with an ability to accommodate present as well as future needs are the most likely to achieve long-term success. Mass transit systems and transit-oriented development are essential strategies for fostering such outcomes.

Challenges and Trends

WRI wishes to emphasize the implications of the long-term regional transportation outlook on the Purple Line decision-making process. Decision makers must recognize these challenges and acknowledge related trends that will impact the region's future transportation needs, such as:

- increasing traffic congestion with a growing regional population;
- crowding on Metro and bus lines throughout the DC area; and
- volatile fuel prices due to projected scarcity, growing demand, and anticipated greenhouse gas regulations.

According to projections from the Metropolitan Washington Council of Governments, congestion and crowding in 2030 could be pervasive. Vehicle miles traveled (VMT) is expected to grow more than twice as fast as highway and road capacity, from 109 million miles in 2000 to 150 million miles in 2030. Capital Beltway traffic is projected to be at a continual "stop and go" pace by 2030, largely due to heavy westbound and suburb-to-suburb travel. Existing transit options will be strained to the limits, with heavy peak-hour crowding across the Metro system.¹

It is also important to plan for the prospects of rising fossil fuel costs and increasingly stringent greenhouse gas (GHG) regulations. Increasing gas prices and a need to shift to low-carbon transport options are often discounted or ignored in transportation planning. Yet these factors significantly influence future transportation needs and must be factored into near-term planning.

¹ See Metropolitan Washington Council of Governments. 2006. "What if the Washington Region Grew Differently?" Results to date of the Transportation Planning Board's Regional Mobility and Accessibility Study: <http://www.mwcog.org/uploads/committee-documents/vVpdWlk20060118160021.pdf>



In light of such trends, the costs and benefits of MTA's various build alternatives need to be carefully weighed against the costs of a business-as-usual (i.e., No Build) approach to transportation.

The Transportation System Management (TSM) option does have some appealing attributes relative to No Build and is a low-cost alternative. On its own, however, TSM is a wholly inadequate solution for addressing long-term transportation needs in the east-west corridor. While it might provide some short-term benefits, these would be quickly overwhelmed by expected growth, and within a few years the region would likely be back to where it started: contemplating various BRT and LRT alternatives, only at potentially higher costs and in a more politically challenging environment.

Key Questions for Transport Planners

WRI urges decision makers to consider the outcomes of further postponement of a robust Purple Line. Concerns to consider include:

- Is current congestion and crowding at a point where a transit line is already overdue?
- Are marginal transportation fixes appropriate for addressing future population growth?
- Will traditional road building have fewer impacts on neighborhoods than mass transit?
- What transit alternatives will be available in the future if the Purple Line is delayed?

Other cities have taken a synergistic approach by complementing public transportation systems with policy instruments, aware that mass transit ridership can dramatically increase when targeted incentives are in place (see examples from Oregon in Appendix A). Market mechanisms such as congestion road pricing and dynamic parking pricing, alongside policy tools such as vehicle use restrictions and road space reallocation, have proven effective as Transportation Demand Management (TDM) strategies elsewhere.

WRI encourages decision makers to consider the positive cumulative benefits that a robust Purple Line would offer. Among other things, a well-designed system would shift more drivers to public transportation, reduce traffic congestion, and cut back on roadway maintenance costs. A Purple Line will not solve all of our regional traffic problems, nor is it intended to do so. However, as one small but important step in the right direction, this transit project and others like it can—if done right—add up to create a brighter transportation future for our region.



WRI Sensitivity Analysis of Cost and Ridership Projections in the Purple Line AA/DEIS

Summary

Estimated costs and ridership are key elements that define the differences between Purple Line alternatives, and their relative benefits and drawbacks. Understanding these variables should therefore be a crucial part of the decision-making process.

WRI examined the sensitivity of the cost and ridership projections provided by the AA/DEIS, using a Monte Carlo Simulation to model outputs under wide but probable variations for both of these critical projections.² Two scenarios were modeled: one in which the forecasts in the AA/DEIS were treated as accurate, and one in which the forecasts were treated as optimistic. Our analysis found that:

- The most robust alternative in terms of cost-effectiveness is Medium Investment BRT.
- There is very high risk that the High Investment BRT and all of the LRT alternatives will not meet the cost and demand projections in the AA/DEIS.

WRI strongly recommends that decision makers consider this information when selecting the locally preferred alternative for the Purple Line.

Background

The summary of Key Evaluation Measures in the AA/DEIS presents point (single-value) forecasts of costs, demand, and user benefits (among other measures), based on standard professional practices. Unfortunately, standard professional practices do not account for the uncertainty associated with predicting costs and ridership.

There is enough evidence in the existing literature to indicate that cost and ridership forecasts are often optimistic at the planning stages. For example, B. Flyvbjerg et al. consolidated data for 44 urban rail projects, and found that average cost overrun was 45 percent and actual ridership was on average 51 percent lower than forecast.³ The cases analyzed by Flyvbjerg et al. include the Washington Metro (which had a cost overrun of 85 percent) and the Baltimore Metro (which had a construction cost overrun of 60 percent and an actual ridership of 40 percent of the figure forecast in the opening year). Transit projects entail the double risk of higher costs and lower demand than expected, and it is better to incorporate such risks in the decision making process than to ignore them.

² Monte Carlo Simulation is a probabilistic technique commonly used in financial analysis to model project outcomes to complex combinations of projects inputs. The Monte Carlo Simulation randomly and repeatedly generates values for uncertain variables. The results are analyzed to decide which variables are most likely to occur. It derives its name from Monte Carlo, the Monaco city near the South of France, which is known for its casinos. <http://www.yourdictionary.com/monte-carlo-simulation>

³ Flyvbjerg B., Bruzelius N. and W. Rothengatter. "Megaprojects and Risk: An Anatomy of Ambition." Cambridge University Press, UK, 2003.

Methodology

We used a method commonly employed in financial analysis to deal with uncertain futures and complex processes called Monte Carlo Simulation.⁴ By using this process we sought to identify alternatives that are “robust” rather than “optimal” in that they fare well under a wide range of values of key variables, rather than performing best when a single future has been forecast.⁵ We concentrated our analysis on three variables: cost, demand, and cost-effectiveness.⁶ Results were compared based on cost per hour of user benefit, per guidance from the Federal Transit Administration (FTA). We conducted the Monte Carlo Simulation analysis for two scenarios:

- 1) The cost and ridership levels are represented by a probability distribution with the mean being the forecast values in the AA/DEIS.
- 2) The cost and ridership levels are represented by a probability distribution with the mean corrected for optimism.

We used these two scenarios because there is a need to incorporate uncertainty in the analysis, since we are dealing with future events that are uncertain by nature. Scenario 1 assumes the forecasts in the AA/DEIS are relatively accurate, while Scenario 2 assumes they are optimistic—consistent with the evidence of frequent optimism in planning for infrastructure projects as noted by Flyvbjerg et al. Assumptions for this analysis are presented in Appendix B.

Results

The Monte Carlo Simulation simulation allows us to get direct probabilities for the variables of cost, ridership, and cost-effectiveness. Not surprisingly, the costs are always greater for the more sophisticated alternative. For example, Medium Investment LRT is greater than Medium Investment BRT, which in turn is greater than TSM. In addition, the demand is always greater for MI BRT than TSM, and 90 percent of the time greater for MI LRT than MI BRT. However, MI LRT is less cost-effective than MI BRT 88.5 percent of the time.

As Table 1 below indicates, the difference in average costs between alternatives is large (607 percent between MI BRT and TSM, and 110 percent between MI BRT and MI LRT). The difference in demand is large between MI BRT and TSM (206 percent), but is small between MI BRT and MI LRT (15 percent).⁷ The difference in the FTA cost-effectiveness metric (cost per hour of user benefit) between MI BRT and MI LRT is moderate (52 percent).

⁴ See footnote 2 for a definition of Monte Carlo Simulation.

⁵ M. Wachs, *Linking Forecasts to Action: Roles, Uses & Misuses of Forecasts in Transportation, Land Use, and Environmental Decision Making*, Lake Arrowhead – UCLA, October 19-21, 2008.

⁶ Cost-effectiveness is a metric that synthesizes the lifecycle costs (capital and operations) and the transport benefits of the project (total travel time reductions per user, multiplied by the number of users).

⁷ The table shows results for Scenario 1 only, as the results for Scenario 2 were very similar in this case.

Table 1. Simulation Results for TSM, Medium Investment BRT, and Medium Investment LRT

Variable		TSM	MI BRT	MI LRT
Cost (USD Millions)	Average	82.0	579.8	1,220.2
	St. dev	24.6	220.3	463.6
Ridership (Passengers per Day)	Average	16,898	51,771	59,312
	St. dev	8,411	14,218	15,113
Cost Effectiveness (USD per Hour of User Benefit)	Average	n.a.	15.9	24.2
	St. dev	n.a.	9.8	7.6

n.a. = not available

Next, as figures 1 and 2 below indicate, in Scenario 1 (the AA/DEIS forecasts are accurate):

- There is significant likelihood of the costs exceeding \$1 billion for HI BRT (65 percent) and all LRT alternatives (83 to 98 percent); see Figure 1.
- The likelihood of costs exceeding \$1.5 billion is 11 percent for MI LRT and 67 percent for HI LRT; see Figure 1.
- The likelihood of demand exceeding 32,000 passengers per day is high (75 percent for LI BRT through 98 percent for HI LRT); see Figure 2.
- The likelihood of exceeding 64,000 passengers per day is low for BRT options (3 to 36 percent) and moderate for LRT options (38 to 59 percent); see Figure 2.

Figure 1. Cost Forecasts Probability Ranges – Scenario 1: AA/DEIS Forecasts are Accurate

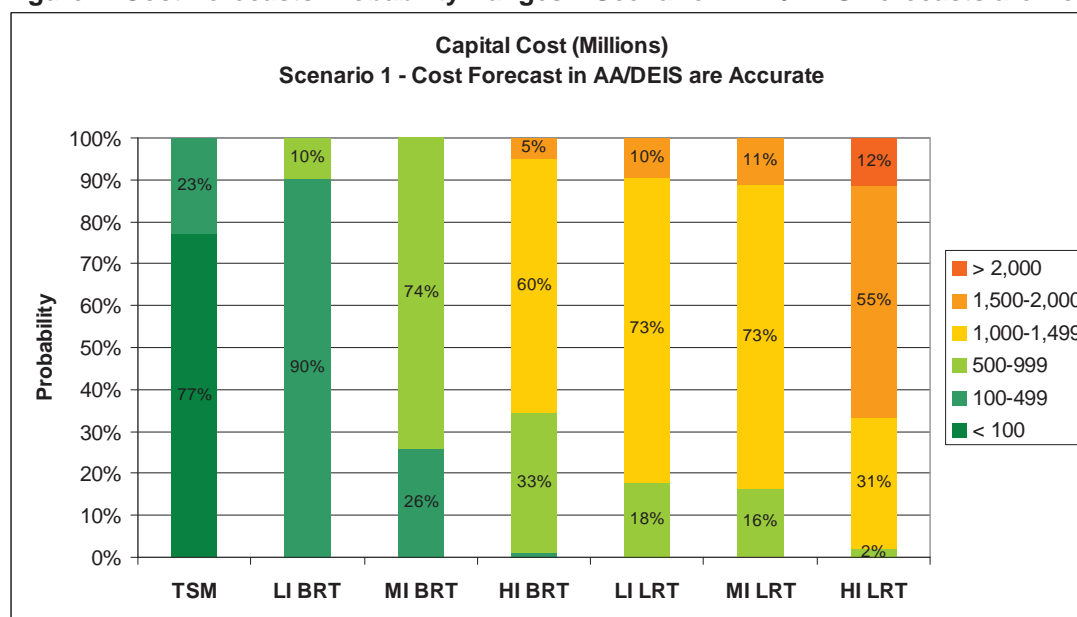
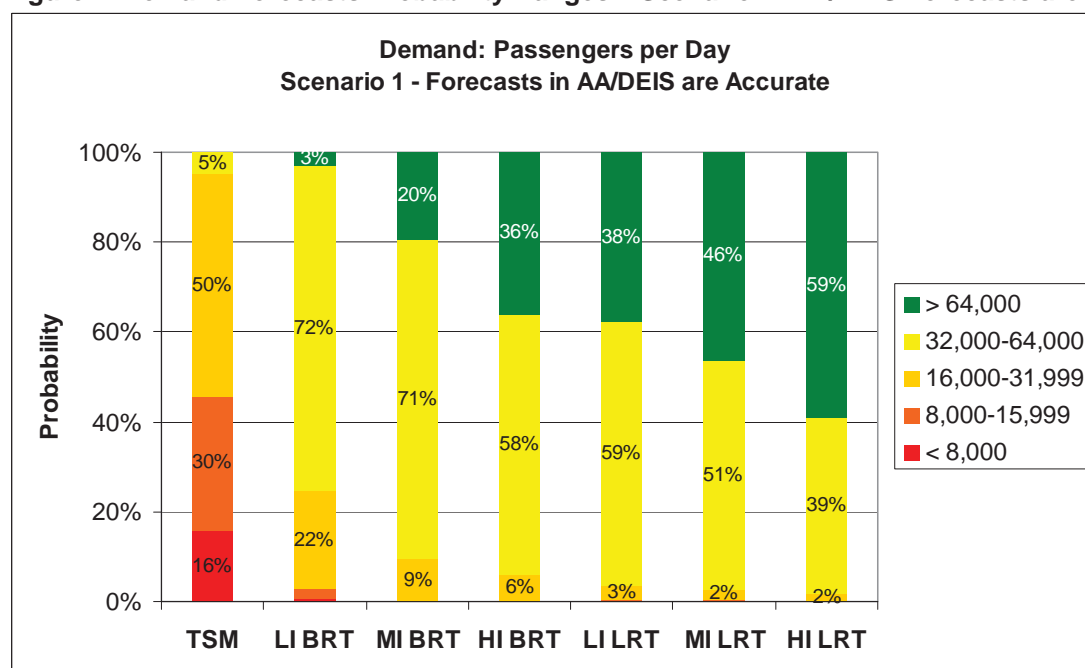


Figure 2. Demand Forecasts Probability Ranges – Scenario 1: AA/DEIS Forecasts are Accurate



Next, figures 3 and 4 below show that in Scenario 2 (the AA/DEIS forecasts are optimistic):

- The likelihood of costs exceeding \$1 billion increases with respect to Scenario 1 for HI BRT (95 percent) and all LRT alternatives (99 to 100 percent); see Figure 3.
- For MI LRT the likelihood of costs exceeding \$1.5 billion is 79 percent, while for HI LRT the likelihood of costs exceeding \$2 billion is 80 percent; see Figure 3.
- The likelihood of demand exceeding 32,000 passengers per day is low for the LI BRT (23 percent) and moderate for the other alternatives (from 47 percent for MI BRT to 71 percent for HI BRT); see Figure 4.
- The likelihood of demand exceeding 64,000 passengers per day is negligible for LI and MI BRT and very low for HI BRT and all the LRT options (2 to 7 percent); see Figure 4.

Figure 3. Costs Forecasts Probability Ranges – Scenario 2: AA/DEIS Forecasts are Optimistic

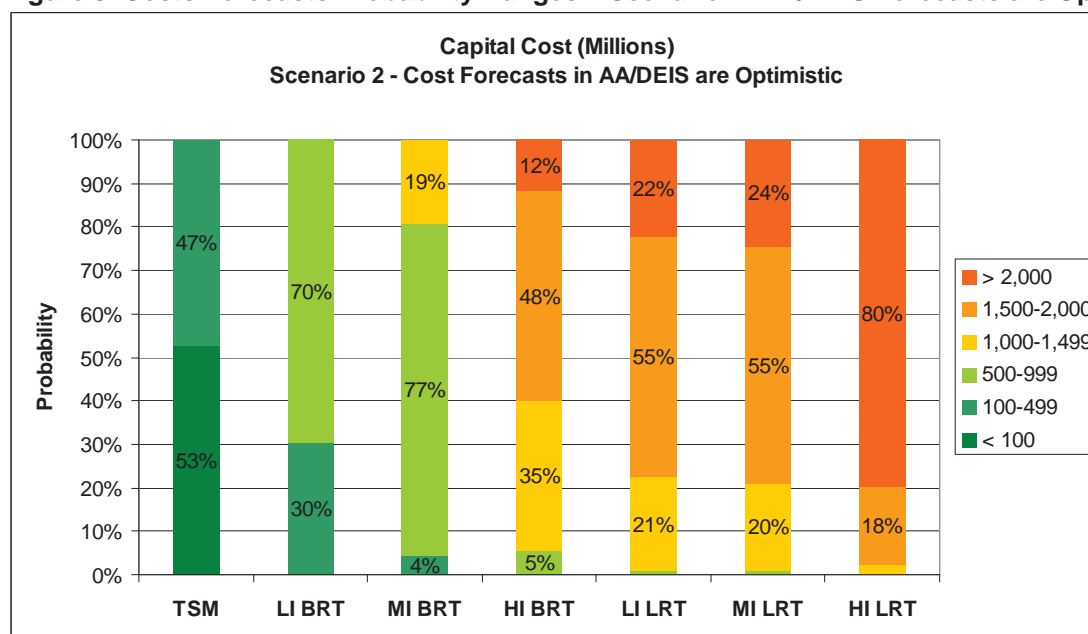
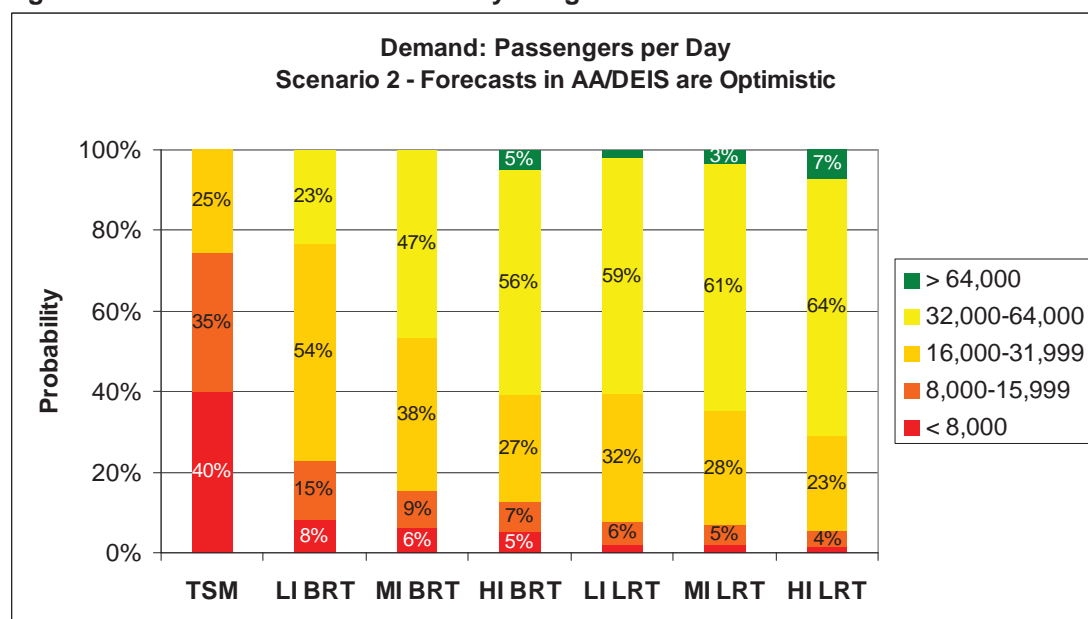


Figure 4. Demand Forecasts Probability Ranges – Scenario 2: AA/DEIS Forecasts are Optimistic



Finally, regarding cost-effectiveness (cost per hour of user benefit) our results indicate the following (see figures 5 and 6, below):

- The most robust alternative across the scenarios we modeled is Medium Investment BRT. Under Scenario 1 (accurate forecasts; see Figure 5), it has an 82 percent probability of being below \$24 per hour of user benefit (FTA medium level) and a 56 percent probability of being below \$15 per hour of user benefit (FTA medium-high level). Under

Scenario 2 (optimistic forecasts; see Figure 6), MI BRT has a 24 percent probability of being below \$24 per hour of user benefit.

- The most robust LRT alternative is Medium Investment LRT. Under Scenario 1 (see Figure 5), it has a 58 percent probability of being below \$24 per hour of user benefit and a 10 percent probability of being below \$15 per hour of user benefit. Under Scenario 2 (see Figure 6), the probability of getting a medium FTA rating is only 0.6 percent.

Figure 5. Probability of Meeting FTA Cost-Effectiveness Assuming Accurate AA/DEIS Forecast

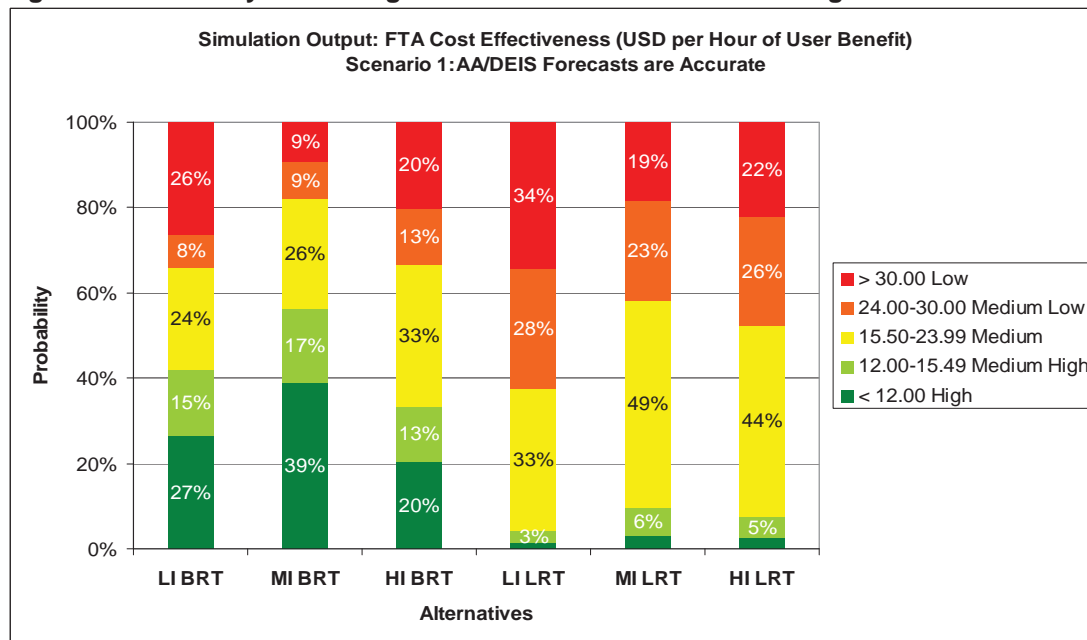
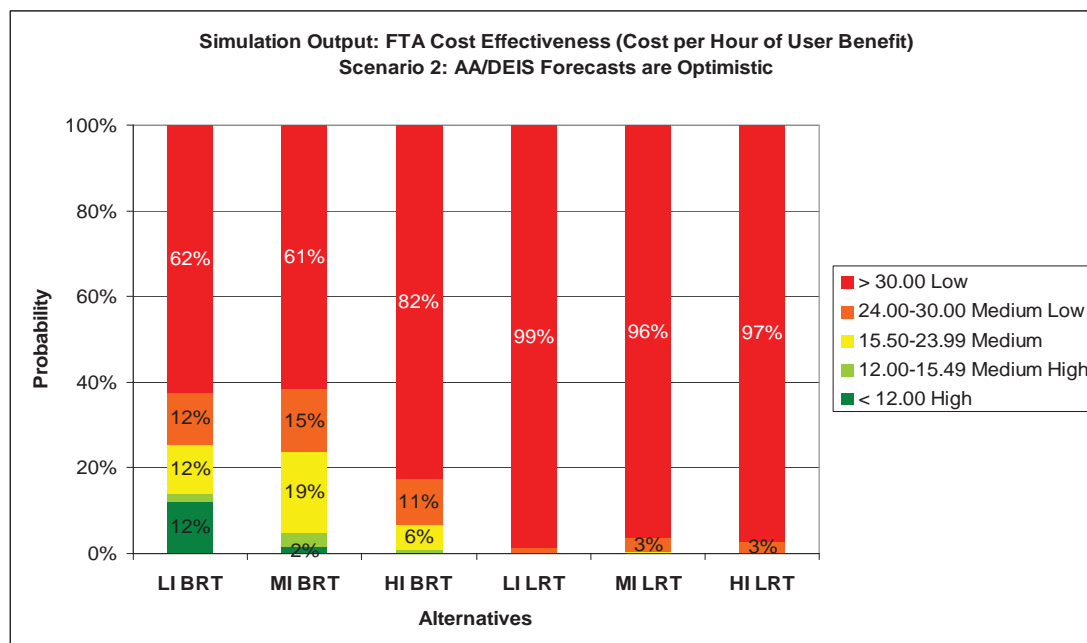


Figure 6. Probability of Meeting FTA Cost-Effectiveness Standards Assuming Optimistic AA/DEIS Forecast



Sensitivity Analysis: Recommendations and Next Steps

WRI recommends combining this sensitivity analysis with other inputs to the decision-making process. Regarding cost-effectiveness, our analysis confirms that the most robust alternative is Medium Investment BRT. High Investment BRT and all the LRT alternatives carry very high risks: it seems likely that the expected cost-effectiveness of each will not be realized. Such risks can lead to a lower probability of receiving state and federal funding and undesired delays in project implementation.

Through our participation in the Purple Line process, we recognize that BRT is not considered as attractive an alternative as LRT in terms of political viability. This may be the result of scarce or misleading information on the potential quality and performance of BRT.⁸ To improve this situation, we suggest that decision makers and other stakeholders seek additional information on the quality of service and impacts associated with existing BRT projects in North America, such as the EmX Line in Eugene, Oregon (see Appendix A); the Los Angeles Orange Line; the Cleveland Healthline on Euclid Avenue; and the Select Bus Service System in New York City.

As design can be improved in the next phases of the project, selecting BRT would open the opportunity for operational designs that do not necessarily require passenger transfers among local and BRT buses. Buses operating on the local highway network might also be able to use the BRT facilities, thus saving time, as is the case with Ottawa's Transitway. Selecting LRT would preclude the use of such flexible operations.

⁸ For additional information, see FTA's *Characteristics of BRT for Decision Makers*, available online at http://trb.org/news/blurbs_detail.asp?id=4213

WRI Greenhouse Gas Analysis of the Purple Line AA/DEIS

Summary

WRI's greenhouse gas (GHG) assessment of the various Purple Line options shows that, relative to the No Build scenario, the High Investment BRT alternative provides the greatest emission reductions, followed by Medium Investment BRT. Meanwhile, the TSM alternative results in the greatest emission increases, followed by the LRT options. WRI recommends combining this information with other considerations when selecting the preferred alternative for the Purple Line. In addition, we provide a list of recommendations on how to improve the current GHG assessment.

Background

WRI considers reducing greenhouse gas emissions from the transportation sector of utmost importance since this sector is a major and one of the fastest growing contributors to dangerous climate change. In the United States, transportation contributed approximately 31 percent of energy-related CO₂ emissions in 2005, second only to the power sector's contribution of approximately 47 percent (WRI, 2008).

Improving the efficiency of end-use activities (e.g., motorized road transportation and encouraging shifts to less fuel-intensive transportation modes) is paramount to reducing emissions from liquid fuels, consumption of natural resources, and dependence on volatile international energy markets. The impact on GHG emissions of mass transit solutions that draw their power from the grid, such as the proposed light rail transit options, depends on the fuel source used to produce the electricity.

For these reasons, WRI believes that transportation projects seeking government approval should include GHG emissions forecasts for all proposed alternatives, and that this criterion be included in the decision-making process. In addition, procedures should be put in place to monitor emission levels once the project has been implemented in order to verify if the forecasts were accurate. Finally, efforts should be made to promote more efficient and less polluting transportation modes and to significantly increase the share of renewable energy that powers the electricity grid.

Methodology

WRI reviewed the AA/DEIS greenhouse gas assessment provided in the Air Quality Technical Report, as well as the Traffic Demand and Energy Technical Reports. To complement these studies, we performed a number of calculations to better understand the methods used and the origin of the numbers presented.

With the aim of recommending how the GHG assessment could be strengthened, we provide the following feedback, covering:

- 1) Assumptions made and disclosed in the AA/DEIS.
- 2) Methodologies and key principles to observe when estimating emissions from transportation projects. (See Appendix C for a discussion on recommended methodologies for comparing transportation alternatives.)

A limitation of our analysis, and possibly the AA/DEIS itself, stems from the uncertainty associated with variables that affect many parameters in the study, such as:

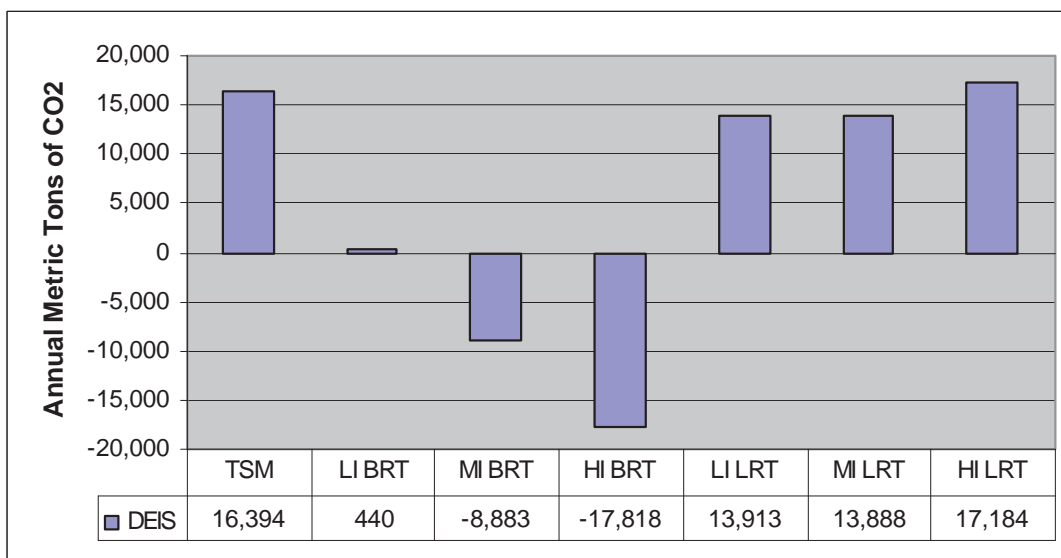
- the price of fuel;
- turnover in vehicle stock and effects on fleet-wide fuel economy from revised Corporate Average Fuel Economy (CAFE) standards;
- population and demographic projections; and
- the impact of likely GHG emissions control legislation on the price and emission levels of each alternative.

Results

In the AA/DEIS, the impact of Purple Line transportation alternatives on CO₂ emissions is presented in terms of daily metric tons of CO₂, with no estimate of uncertainty levels or provision of sensitivity analysis. The results are also presented in terms of percentage change from the No Build scenario and, as explained in the Traffic Analysis Technical Report, these estimates include vehicle miles traveled on roadways for the entire Washington DC Metropolitan Area. It could be expected that changes in emissions caused by a 16-mile local transit project would be small when compared to emissions from vehicles in the whole region.

To provide a better appreciation of the extent of emissions impact from the transportation alternatives, WRI therefore presents the results in terms of absolute annual metric tons, as illustrated in Figure 7. The values presented include emissions from mass transit and impact of modal shift (meaning the number of people who shift their mode of transportation from private vehicle to mass transit or vice versa). For comparison, the information could also be presented in terms of the equivalent number of passenger vehicles taken off the road. In the case of High Investment BRT, that number would be 3,260 based on average annual vehicle emissions of 5.46 metric tons CO₂-equivalent, according to the U.S. EPA (2008c).

Figure 7. Comparison of Purple Line Impact on Annual CO₂ Emissions for 2030, Against the No Build Scenario



(Source: Purple Line AA/DEIS, 2008)

As illustrated in Figure 7, only the Medium and High Investment BRT alternatives reduce CO₂ emissions, with 8,883 and 17,818 fewer metric tons per year, respectively, compared to the No Build scenario. All of the remaining alternatives increase annual emission levels compared to No Build. Energy consumption from roadways decreases with introduction of LRT, but the resulting emissions reduction is not sufficient to counterbalance the effect caused by the high electricity CO₂ emission factor. While we anticipate that this emission factor will decrease in the future due to increased use of renewable energy sources and likely GHG reduction legislation, these drivers have not been included in the AA/DEIS. Further consideration is given to the electricity emission factor in the following sections.

The difference of impacts on emissions levels, when presented in absolute terms, can be considered small when compared to regional, national, and global emission levels. However, the variance between transportation alternatives—approximately 35,000 metric tons per year and equivalent to the annual emissions of over 6,400 passenger vehicles (US EPA 2008c) when comparing High Investment BRT with High Investment LRT—should not be dismissed. In fact, the only way to meet anticipated national GHG emissions targets needed to stabilize climate system will be in making numerous emissions reduction interventions, large and small, across the U.S. economy.

Exploration of AA/DEIS Assumptions

In our analysis, we explore a selection of parameters used in the AA/DEIS estimation of CO₂ with the goal of providing additional information of value for decision making. The parameters selected were based on the assumptions available in the AA/DEIS:

- electricity emission factors;
- mass transit vehicle occupancy rates; and
- alternative fuel and bus vehicle technologies.

Some assumptions used in the AA/DEIS were not disclosed and therefore could not be evaluated.

Electricity emission factors. The choice of electricity emission factors used in the Purple Line analysis affects the net emissions anticipated from the LRT options because the LRT system would be powered by the electricity grid. Electricity emission factors vary significantly depending on the mix of energy feedstocks and their respective carbon intensity; for example, hydropower has a relatively low carbon intensity compared to coal.

While the AA/DEIS used a Maryland state-based emission factor in performing these calculations, WRI proposes using a sub-regional emission factor instead, such as those found in the U.S. EPA's Emissions & Generation Resource Integrated Database (eGRID), to more accurately capture the true emissions intensity of the power plant coverage area providing electricity to the Purple Line LRT (US EPA 2008b). This would be consistent with existing best practices such as those used by the California Climate Action Registry, the Climate Registry, and EPA's Climate Leaders, all of which build off the WRI/WBCSD Greenhouse Gas Protocol's *Corporate Accounting and Reporting Standard, 2nd Edition* (US EPA 2008a, US EPA 2008b, WRI/WBCSD 2005, Climate Registry 2008).⁹ The United Nations Framework Convention on Climate Change (UNFCCC) also recommends using regional grid data for large countries where this information is available.

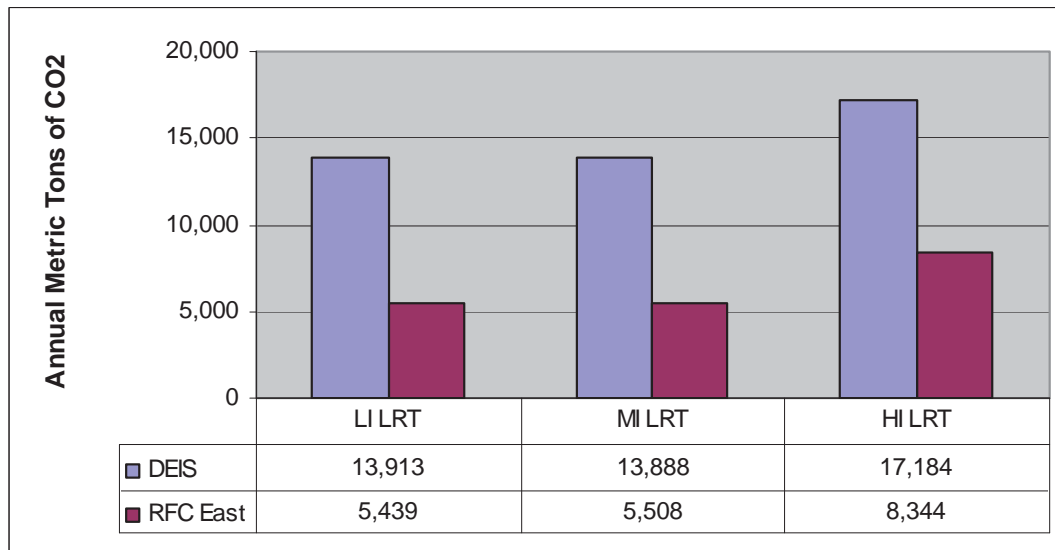
We used EPA's eGRID documentation and its Power Profiler website to identify the appropriate emission factor. Based on the ZIP codes for all Purple Line areas from Bethesda to New Carrollton, the project area falls entirely in the RFC East sub-region which encompasses portions of Maryland, Pennsylvania, Delaware, and New Jersey. This area's electricity generation and service is overseen by the ReliabilityFirst Corporation (RFC).

Several aspects of the grid emission factor merit further analysis, as this number bears great influence on the net GHG emissions caused by electricity-driven LRT options. This can in turn affect the favorability of LRT options in comparison to other alternatives. While the AA/DEIS's projections indicate that all three LRT alternatives would result in a net emissions increase compared to No Build, we believe this increase is likely smaller than forecast in Chapter 4 of the AA/DEIS (page 4-48). Quantifying Purple Line emissions using the regional emission factor would result in a 50-60 percent reduction in emissions for LRT options compared to the AA/DEIS forecasts, as shown in Figure 8.¹⁰ WRI believes this emission reduction would still be conservative, as the eGRID-derived factor is a current figure and does not incorporate expected drops in carbon intensity for the power sector.

⁹ By using the Maryland state emission factor, the AA/DEIS implicitly states that the LRT system will draw electricity from the central grid instead of from an off-grid captive power plant which would have a separate emission factor. We maintain this assumption since no indication otherwise is presented.

¹⁰ The AA/DEIS uses a grid emission factor of 401.5 lbs. CO₂/million BTU, which can also be expressed as 1370 lbs. CO₂/MWh, since 1 kWh = 3412 BTU. As the Purple Line project falls under the RFC East region in EPA's eGRID, the appropriate regional emission factor would be 1090.5 lbs. CO₂/MWh, a 20.4 percent decrease. Note that even though the RFC East emission factor is 20.4 percent less than the emission factor used in the AA/DEIS, LRT emissions result in a 50-60 percent reduction from AA/DEIS forecasts when incorporating effects from the modal shift (i.e., reduced private vehicle emissions).

Figure 8. 2030 Annual GHG Emissions with AA/DEIS and RFC East Electricity Emission Factors, Against the No Build Scenario¹¹



(Source for RFC East emission factors: US EPA. Emissions & Generation Resource Integrated Database (eGRID), 2008.)

Several states in eGRID's RFC East sub-region have passed renewable portfolio standards (RPS) requiring that utilities generate a set percentage of electricity from renewable sources by a specified year. In Maryland, this figure is 20 percent of the state's total electricity production with a minimum of 2 percent derived from solar photovoltaics by 2022 (DSIRE 2008). Since we do not know which fuel sources this renewable electricity will displace, or the emission factors for the renewable sources, we cannot be sure about which emission factor to use for 2030. Regardless, the number should be lower than the AA/DEIS's stock value, barring construction of new high-carbon-intensity power generation that would cancel the reductions caused by the introduction of renewable energy sources, and should be reflected in future GHG forecasts.

Mass transit vehicle occupancy rates. The AA/DEIS uses national average values of 8.7 and 22.4 passengers/mile for BRT and LRT systems, respectively. WRI believes that the occupancy rate selected for BRT is an underestimate since the U.S. average for conventional buses includes a mix of buses running in rural and urban settings, not all in BRT-type conditions.

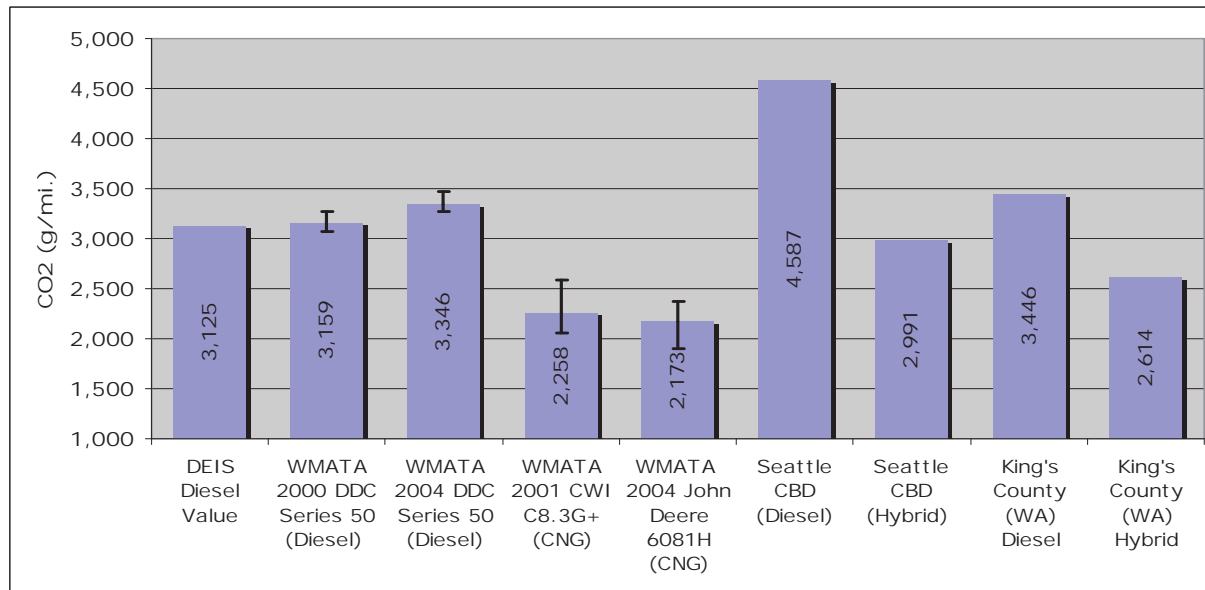
To be fair, there is a lack of reported data available on the average ridership of BRT systems in the United States. However, since systems like the Purple Line BRT options have similar operational specifications to LRT systems, the occupancy rate for the BRT should be much closer to the LRT estimate of 22.4 passengers/mile.

The higher passenger load has an impact on emissions since fewer miles are traveled to transport the same number of passengers, leading to reduced emission levels.

¹¹ The values presented in Figure 8 include the emissions from LRT and the modal shift incurred as a result of implementing LRT. If we were to isolate the emissions from LRT from the modal shift implications, the emissions change that results from using the sub-regional electricity emission factor would be lower, since modal shift causes a reduction in total LRT emissions.

Vehicle propulsion factors. The AA/DEIS uses single propulsion factor values for both BRT and LRT alternatives, which overlooks the range of fuel sources and technology types for either transit mode. Figure 9 depicts a range of propulsion values for potential BRT systems including diesel, compressed natural gas (CNG), and hybrid electric, based on studies developed for the Washington Metropolitan Area Transit Authority (WMATA) and the King County, Washington Metro Transit Authority.

Figure 9. GHG Emission Intensities for Selected Bus Fuel and Vehicle Technology

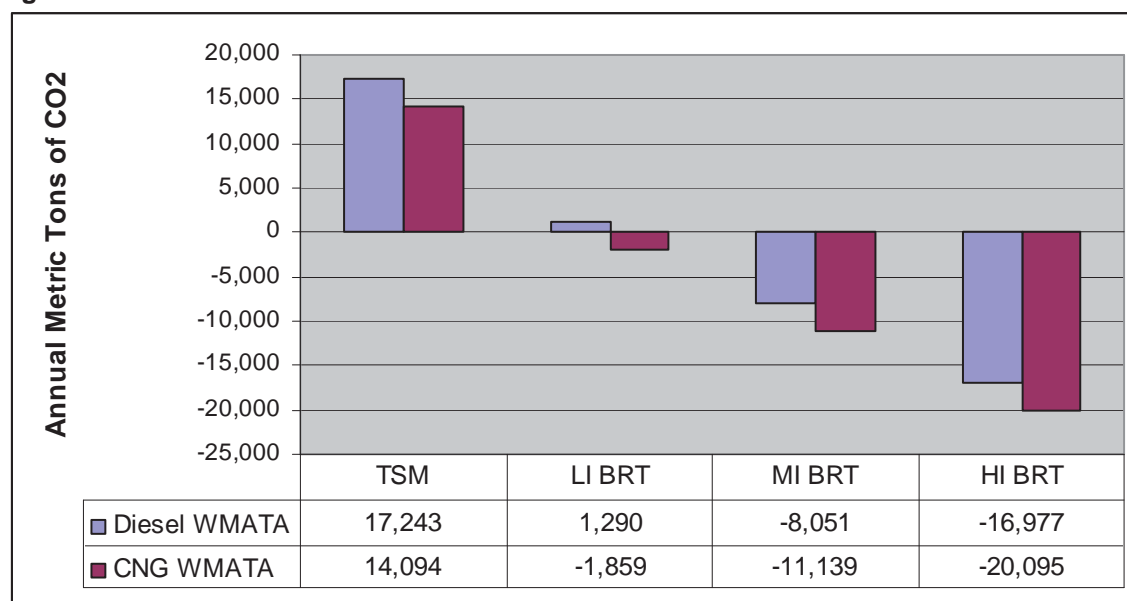


(Source: Melendez et al. 2005, Chandler and Walkowicz 2006.)

The error bars for WMATA vehicles represent the range of values obtained after multiple test runs conducted by the National Renewable Energy Laboratory (NREL) in Washington, DC (Melendez et al. 2005, Chandler and Walkowicz 2006). Figure 9 shows high variability in anticipated GHG emissions contingent upon engine and fuel type and driving cycles. The diesel buses operating in Seattle's Central Business District (CBD) emit over twice the emissions per mile traveled as some CNG bus classes operating in the Washington DC Metro Area, underscoring the significance that propulsion values play in determining net emissions. WRI therefore recommends that, when evaluating the impact of the Purple Line on emissions, bus propulsion values be explored.

For purposes of illustration, Figure 10 presents the impact of replacing diesel with CNG buses for the Purple Line TSM and BRT/LRT alternatives. In the AA/DEIS, all bus options are assumed to be diesel-based. As the figure shows, Medium Investment BRT using CNG technology would reduce CO₂ emissions by 38 percent compared to diesel technology.

Figure 10. Comparison of Annual GHG Emissions in 2030 for Diesel and CNG Bus Technologies, Against the No Build Scenario



(Source for emissions factors: Melendez, et al. 2005. Activity data from AA/DEIS.)

GHG Assessment: Recommendations and Next Steps

- WRI recommends development of a more transparent and complete GHG assessment of the Purple Line alternatives. Key information needs to be centralized in one section of the AA/DEIS, key assumptions need to be disclosed, units need to be corrected throughout the technical reports, and values made consistent among the reports.
- WRI agrees with the AA/DEIS's findings that Medium and High Investment BRT systems will reduce GHG emissions while the TSM and LRT scenarios will increase emission levels. However, the AA/DEIS does not disclose all assumptions and may ignore several exogenous factors that influence the level of ridership and consequent emissions. To overcome this problem, emission levels could be presented in ranges or uncertainty levels disclosed.
- Conducting a sensitivity analysis would prove which variables are most influential in determining the final GHG emissions results. Thus, variables such as the BRT's fuel consumption or propulsion factor should be tested for each of the configurations potentially composing the Purple Line BRT fleet (e.g., CNG, diesel, hybrid). Our results show that depending on the propulsion value selected net emissions may vary by 20+ percent.
- WRI suggests using a sub-regional emission factor for electricity consumption instead of state-based emission factors, as explained earlier.

- We propose using similar vehicle occupancy rates for LRT and BRT since they would be designed to provide similar levels of transportation service. Occupancy rates can be expressed as an average or a range, the latter enabling a better appreciation of the variability that exists between systems.
- Any estimates of percentage change in emissions due to the Purple Line can be misleading as in Table 4.7-5, by making relative comparisons to the Washington DC Metro Area's aggregate emissions. Instead, these numbers should be judged in absolute terms, or at a minimum compared to total CO₂ emissions burdens for only the Purple Line region, and not the entire DC area.
- Future analyses should incorporate variable uncertainty into their forecasting models, since point estimates provide no insight into the range of possible values these quantities may assume. Where information is unavailable regarding standard deviations and probability distributions, a qualitative treatment and estimated value ranges should be provided and justified. By including substantiated minimum and maximum values (for quantities such as annual GHG emissions or total daily boardings) in policy analyses, policymakers are able to make informed decisions based on improved information that point estimates cannot provide.



Appendix A. LRT and BRT Case Studies: Portland and Eugene, Oregon

In detailing the alternatives under consideration, the AA/DEIS rightly points to examples of other U.S. localities where comparable transit systems have been implemented. It is often instructive to study the experience of other cities, and we welcome this approach. To add to this discussion, we also offer two brief but instructive case studies of successful LRT and BRT systems in Oregon.

Transit Project Experiences and Lessons from Oregon

Oregon has a well-deserved reputation for progressive transportation and land-use planning. For 35 years the state has planned around established urban growth boundaries that encourage efficient land use and protect natural areas as well as air and water resources. Several Oregon cities are often cited as the gold standard in implementing sustainable transportation strategies through mixed-use, transit-oriented development. A brief look at two such examples can provide lessons for Maryland's proposed Purple Line system.

Portland's Metropolitan Area Express (MAX)

Key Statistics (all lines combined)

Construction Costs: \$1.65 billion

Length: 44 miles

Stations: 64

Daily Ridership: ~100,000 trips

Annual Ridership (FY07): 34 million trips



Portland's MAX light rail system (photo by Andrew Collins)

Portland installed the first of four segments of the MAX light rail system in 1986 with funds reallocated from capital originally marked for highway development. Subsequent segments were constructed in 1998, 2001, and 2004. Today the MAX ranks among the top five systems nationwide in terms of ridership and is an example of successful, proactive long-term transportation and urban planning.

Overall, ridership has grown some 200 percent between 1997 and 2006 (population increased 11 percent during this period). Investments in additions and extensions have been driven by the following:

- Billions of dollars in savings through avoided infrastructure costs including urban freeways, neighborhood disruptions, and increased air pollution
- Dedicated right-of-way within the existing road system, crossing local streets at grade in coordination with the roadway signal system
- Success in facilitating compact, mixed-use development around stations
- Riders' familiarity with the MAX system
- A defined transit role within a balanced transport system that includes roads, freeways, bike routes, sidewalks, and other modes of transport

A fundamental reason for transit success in Portland has been an effective long-term vision that guides near-term implementation strategies. The region has an overall planning horizon that reaches out to 2040. The city also has a Metro Regional Transportation Plan that sets 20-year development strategy for the transportation system—a long-term perspective providing critical direction for near-term transit system implementation plans. This integrated, long-term approach allows the region to prepare for future challenges and develop appropriate transportation options to meet demands.

Eugene-Springfield Emerald Express (EmX)

Key Statistics (all lines combined)

Construction Costs: \$24 million

Length: 4 miles (+7.8 miles in 2010)

Stations: 10

Daily Ridership: 8,000 - 10,000 trips

Annual Ridership (FY07): 1.4 million trips



Eugene's EmX BRT system (photo courtesy of Eugene Lane Transit District)



In contrast to Portland's MAX system, the EmX in Eugene, Oregon is a smaller transit system based on a bus rapid transit (BRT) model. The EmX Green Line, which opened in 2007, provides a commuter connection between Eugene and Springfield—a metro area of approximately 330,000 residents expecting significant population growth over the next several decades.

The region weighed several transit alternatives as part of the planning process. Considering financial resources and the current population density of the areas, planners decided on a BRT system as the best option and noted it would not preclude light rail options for the corridor in the future. Planners also considered traditional bus service, but deemed this inappropriate due to projected congestion in the corridor that would delay bus travel and diminish public appeal.

Ridership has thus far exceeded projections due to high fuel costs and positive community reactions to the BRT's appearance and convenience. Elevated platforms, art, landscaping, and the sleek design of the hybrid buses have all contributed to general public popularity. Signal priorities and exclusive right-of-ways (60 percent of the corridor) enable accelerated service. The city is pursuing plans for additional EmX corridors in 2010 and 2015.

Appendix B. Assumptions for Sensitivity Analysis

Table B1. Inputs to Monte Carlo Simulation

	Forecast is Accurate		Forecast is Optimistic	
	Capital Cost (USD)	Demand (passengers/day)	Capital Cost	Demand
TSM	81,960,000 (s.d. 30%)	16,900 (s.d. 52.4%)	+20% (s.d. 30%)	-39.5% (s.d. 52.4%)
LI BRT	386,390,000 (s.d. 38%)	40,000 (s.d. 52.4%)	+45% (s.d. 38%)	
MI BRT	579,820,000 (s.d. 38%)	51,800 (s.d. 52.4%)		
HI BRT	1,088,480,000 (s.d. 38%)	58,900 (s.d. 52.4%)		
LI LRT	1,206,150,000 (s.d. 38%)	59,300 (s.d. 52.4%)		
MI LRT	1,220,150,000 (s.d. 38%)	62,600 (s.d. 52.4%)		
HI LRT	1,634,840,000 (s.d. 38%)	68,100 (s.d. 52.4%)		

Note: Probability distributions are assumed normal with Mean and Standard Deviation according to the table. Simulation assumes that the probability distributions are not independent. Correlation is 50% between BRT and TSM, and 50% between LRT and BRT. Source of variations: B. Flyvbjerg, M.K. Skamris Holm, S.L. Buhl.

Appendix C. Methodology for Comparing GHG Emissions of Transportation Alternatives (Based on Cordeiro M., Schipper L. et al, 2008)

In the United States there are currently no officially approved methodologies to evaluate the impact of transportation projects on GHG emissions. WRI encourages developing standard methodologies for estimating emissions from transportation projects, upgrading transportation models to provide activity forecasts with lower uncertainty levels, and integrating land use, transportation, and emissions models. We recognize that emission forecasts are not devoid of uncertainty and the methods available still need improvement to offer more complete assessments. WRI recommends that project developers describe the methodologies used and clearly present the assumptions made in the analysis, so that reviewers and policymakers can understand the limitations of the assessment and make informed decisions.

Methodologies tend to be project-specific due to the nature of local transport interventions. To estimate the impact of proposed transit projects on emissions, we first need to define the assessment boundary based on the area within which the project has a significant impact on emissions. It should not be forgotten that a transport intervention has primary effects (intended changes on the transportation system) and secondary effects (unintended changes caused by the project activity). The secondary effects can cause one-time impacts such as emissions from construction and decommissioning of project activities, and may happen upstream (e.g., where vehicles and fuels are produced) or downstream of the project (e.g., changes in traffic or travel outside the project boundary). The impacts on non-project vehicles and people can be difficult and expensive to calculate. Although one may decide to ignore these effects, experience in some cities indicates that their impacts on emissions can be significant and cause an increase or decrease in overall emissions.

For the benefit of completeness and transparency, the methods and assumptions used to define the GHG assessment boundary and the impacts upstream and downstream of the project should be explicitly disclosed. A rough estimate of upstream and downstream impacts can help assess their magnitude and significance before big investments in measurements are made. Where a project's impact is considered negligible or within the margin of error of the overall emissions reductions estimate, this impact can be dismissed or a conservative assumption of its magnitude should be made.

In broad terms, the framework to estimate CO₂ emissions from transportation projects should include seven main steps: (1) land-use forecasting, (2) travel demand forecasting, (3) transportation systems operations analysis, (4) modal and vehicle activity analysis, (5) fuel and emission factors analysis, (6) fleet and vehicle characteristics analysis, and (7) emissions estimation. Land-use forecasting determines the changes in population and demography in the area of interest and spatially allocates people, households, and commercial activities. Travel demand forecasting estimates the level of travel, given the spatial outputs from a land-use model. Transportation systems operations analysis predicts the travel times, speeds, delays, and modal activity. The entire set of components forms a comprehensive procedure for analyzing the emission impacts of transport interventions. Additionally, there may be feedback between this systems operations analysis and previous components. For example, predicted travel times may influence land-use and travel demand, which in turn will affect systems operations. Given

vehicle modal activity data, emissions can be predicted, possibly with information from technology/fleet and vehicle efficiency analysis.

There has been a call for integrating land-use and transportation models used in the metropolitan planning process, based on the recognition that land use influences transportation outcomes and that transportation investments influence land-use decisions. This integration has been accomplished at the aggregate level, but there is a need to better understand the behavioral linkages between daily household activity and travel patterns on the one hand, and long-term choices of housing and job location and vehicle ownership on the other, to provide a robust behavioral foundation for model development that incorporates these factors (University of Washington et al., 2001).

Two main elements form the interface between emissions and traffic simulations or models: the vehicle fleet distribution (vehicle type in terms of transport mode and emission characteristics) affected by the transport measure, and the emission and traffic simulation model (dis)aggregation levels. This (dis)aggregation refers to the size of spatial, temporal, and demographic categories used in the models, enabling them to more or less realistically represent transportation user behavior and emission rates.

Finally, it should be noted that many good models robustly interpret the real world and allow the effects of different scenarios to be compared, albeit under modeled and not real-world conditions. However, few models precisely capture reality within a known uncertainty band. The differences between reality and the modeling environment are due in part to uncertainties in the model's design, uncertainty in the base data and parameters (e.g., emission factors by class and age of vehicle, driver aggressiveness distribution, etc.), and uncertainties in the model's calibration (origin-destination surveys, on-road fuel consumption measurements, etc.). Uncertainty levels can be improved by using the same method and models to estimate emissions from project alternatives.

Appendix D: Additional Observations Regarding AA/DEIS Reports

- *Energy Technical Report*
 - It is unclear why the creation of a Purple Line system would affect the number of heavy trucks, positively or negatively, as indicated in Table 2-1. A justification of this would be informative.
 - Though energy intensity values for cars and light trucks are taken from the DOE's Transportation Energy Data Book, it is not clear why a 1.2 passengers/vehicle value was used in the AA/DEIS when DOE indicates an average value of 1.57.
- No explanation is offered for the inconsistent values found in different sections of the AA/DEIS. For example, in Chapter 4 the VMT and daily direct energy demand numbers differ between Table 4.15-1 and Tables 4.7-4 and 4.7-5.

Appendix E. Further Reading on GHG Emissions Assessments

- American Public Transportation Authority. *2008 Public Transportation Fact Book*. 59th Ed. June 2008.
- California Climate Action Registry. (<http://www.climateregistry.org/>) 2008.
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Appendix F. List of Authors, Reviewers, and Project Support Staff for WRI's Purple Line Analysis

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Submission Content/Notes : Good afternoon. My name is Greg Fuhs, G-R-E-G, F-U-H-S. I represent the World Resources Institute, an independent, non-partisan environmental think tank based in Washington, DC.

Our staff of 160 works on a wide range of environment and sustainable development issues worldwide providing peer review research and analysis to find practical solutions to some of our most pressing problems.

We have joined the purple line discussion to share our significant experience analyzing and implementing sustainable transit solutions around the globe.

Also as a local organization with many staff living near the proposed route, we have a direct stake in seeing the best possible alternative selected.

In recent months, WRI has consulted with a diverse group of stakeholders on this issue and we are assessing key elements of the DEIS with a commitment to objectivity and analytical rigor.

We will soon submit detailed written comments, but today we wanted to provide some initial thoughts.

First through our initial analysis we have concluded that a robust purple line should be built as soon as possible to achieve the stated project purpose.

We find that the no build and TSM alternatives are not viable because they fail to adequately address long-term congestion and related issues.

While the purple line is no panacea, without it the region will be forced to take even more costly and disruptive actions in the future to address expected growth and resulting traffic and related problems.

Second, we believe that either a well designed BRT or LRT could if done right improve mobility, support economic development and reduce the environmental impacts of transportation in this area.

There are legitimate concerns about building a transit line along the proposed routes and each alternative as currently proposed has its drawbacks.

However, the consequences of delaying or abandoning this project would be far greater.

Third, we note that key factors to weigh in any transit investment include local needs and preferences, political and financial feasibility, cost effectiveness and balancing of economic and environmental considerations.

While the DEIS touches on all these areas, we do see some gaps where additional analysis and/or clear presentation of data can shed important light on the alternatives.

Our forthcoming written submission will focus on assessing the risks, cost effectiveness and greenhouse gas emissions profiles of the various alternatives.

We will also provide a sensitivity analysis of cost and ridership projections with an eye toward incorporating assessments of uncertainty into the decision making process.

Ultimately, as I said, there are pros and cons to each alternative and the final selection may call for significant revisions.

After the selection process, we urge MTA to continue consulting with the public on system design and placement and on approaches to mitigating negative impacts.

We look forward to engaging further on the purple line project and hope to see its early implementation. Thank you for the opportunity to provide input.