

Purple Line FEIS - RECORD #601 DETAIL

Comment Date : 10/18/2013
First Name : David
Last Name : Kirsch
Address : 6400 Brookville Road
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address : dkirsch@umd.edu

Submission Content/Notes : I am a very strong supporter of building the Purple Line as soon as possible. This will represent a significant and major improvement to our region's transportation infrastructure. If there are minor issues with the plan, so be it. Fix them, and let's get on with it! Thank you.

A.1

Purple Line FEIS - RECORD #602 DETAIL

Comment Date : 10/18/2013
First Name : Richard
Last Name : Lorr
Address : 302 Windsor Street
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : Rlorr4@gmail.com

Submission Content/Notes : My residence is about two tenths of a mile from the proposed Wayne Avenue Power Substation site. I am opposed to the MTA's current power substation plans, and I am writing to ask that the MTA find a better solution to the problem. Until it finds a proposal that the neighborhood agrees is compatible with the needs and character of our area, I request that the MTA keep OPEN the issue of what to do about the Power Substation on Wayne Avenue.

C.4

Purple Line FEIS - RECORD #603 DETAIL

Comment Date : 10/18/2013
First Name : Martina
Last Name : Childress
Address : 616 Greenbrier Drive
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : martinachildress@yahoo.com

Submission Content/Notes : Dear Sir/Madam: I have had the privilege to live on Greenbrier Drive, off Wayne Avenue, in Silver Spring, Maryland, since 1995. My husband, daughter and I live in my husband's parent's home. They raised their family here and now we are raising our daughter here. We believe progress is good and we look forward to the purple line BUT, please be assured we are very concerned about putting the Traction Power Substation at Wayne and Cloverfield as an open-air installation surrounded by a long, high, fence or wall. We ask that MTA keep this issue OPEN. We don't agree with the original MTA plan and sincerely request MTA keep OPEN the development of a plan for a TPSS somewhere else on Wayne. Respectfully, Martina Childress, Resident of Greenbrier Drive

C.4

Purple Line FEIS - RECORD #604 DETAIL

Comment Date : 10/19/2013
First Name : AGNESE
Last Name : ARNOLD
Address : 4519 HIGHLAND AVE.
City : BETHESDA
State : MD
Zip Code : 20814
Email Address : areforzo@hotmail.com

Submission Content/Notes : The FEIS is flawed. It does not consider the trail an invaluable recreation area with its 20 acre forest an irreplaceable natural resource. This stretch has been used as a park for over 20 years and lacks the consideration of how invaluable it is in people's lives.

C.3

E.5

I have lived in downtown Bethesda my entire life. Growing up, the trail was not yet established and was a run-down, scary, abandoned railroad track that no one wanted to go near. Then it was converted to a trail where tons of people use it daily for exercise, healthy well-being, recreational activities, and commuting. I want to be able to continue to do these things SAFELY with my kids. The overground rail would not allow this and the pollution it causes would also be a negative impact. No one I know said they would use the purple line. Has there been any real survey of ridership? Most folks I know want to BIKE to commute to Silver Spring because it provide them with their daily exercise and nature intake.

E.9

The document fails to recognize the noise disturbance a walker, runner or biker will endure alongside trains traveling 50mph. The peaceful tranquil setting it is today will be harmfully impacted by a train sound 200 times a day. This is what an environmental impact statement is supposed to point out, but this one doesn't.

D.5

As part of the Save the Trail!, we envision a world class trail and park system from Georgetown through Bethesda and connecting into downtown Silver Spring. According to this Final Environmental Impact Statement, the Capital Crescent Trail isn't worth saving.

K.5

I urge you to please reconsider this as it will do more harm than good.

Purple Line FEIS - RECORD #605 DETAIL

Comment Date : 10/19/2013
First Name : Thane
Last Name : McCann
State : MD
Email Address : mccannthane@yahoo.com

Submission Content/Notes : To whom it may concern,

C.2

After having read the report, its unfortunate that the project appears to be using the 'preferred alternative' and seems largely to ignore the population/communities along the proposed route. Comparing the preferred alternative to 'no build' is a logical fallacy, and ignores the other reasonable alternatives presented.

The report begs the question, are the interests of the public being honorably served through this venture, or are there other (private/commercial) actors that will benefit.

A visit to any densely populated European city and discussing with their urban planners would yield better options (to include technology) that could serve this long term public transportation need while maintaining the character of the DC suburbs.

E.4

The result of this 'preferred alternative' advocated by MTA will lead to urban blight as the educated and wealthy citizens move further out into the suburbs. Do any of the MTA planners live in the vicinity of the proposed route? If not, I expect that they'll be able to find relatively cheap housing in the area if this plan comes to fruition.

Purple Line FEIS - RECORD #606 DETAIL

Comment Date : 10/20/2013
First Name : Cathy
Last Name : Kristiansen
Address : 729 Dartmouth Avenue
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : cathykaywriter@gmail.com

Submission Content/Notes : Regarding the TPSS (power station) planned for Wayne Ave., I strongly urge you to find an alternative location and configuration that won't blemish an already disrupted neighborhood. Think long-term rather than short-term PLEASE!

C.4

Purple Line FEIS - RECORD #607 DETAIL

Comment Date : 10/20/2013

First Name : Robert

Last Name : McGaughy

State : MD

Email Address : bnbmcgaughy@verizon.net

Submission Content/Notes : I ask you to keep open your plan for putting a power substation at the corner of Wayne and Cloverfield Avenues. The citizens task force has presented some viable alternatives to this neighborhood eyesore and I think these alternatives deserve careful consideration.

C.4

Purple Line FEIS - RECORD #608 DETAIL

Comment Date : 10/20/2013
First Name : Barbara
Last Name : Sanders
Address : 1710 Noyes Ln
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : BSanders@TerpAlum.umd.edu

Submission Content/Notes : MTA has done an inspiring job over the last decade to work through all the issues which continue to be raised and reiterated by communities, business, residents and employers adjacent to and at substantial distance from the PL. The FEIS highlights that MTA will continue this process throughout construction and maintain communication with the adjacent property owners when operation begins. There are members of these communities that have looked forward to having this E-W transit connection from the time Montgomery County purchased the Georgetown Branch ROW in the late 1980s. A lot has changed in and along this ROW in all those decades, but NOT the need to move people within it. We also have always supported the hiker/biker trail from Bethesda all the way through to trail connections in downtown Silver Spring. We have been waiting for a long time, and hope both the transit and trail come to fruition in the VERY near future.

A.1

Purple Line FEIS - RECORD #609 DETAIL

Comment Date : 10/20/2013
First Name : Carlos
Last Name : Quintana
Address : 613 Wayne Avenu
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : cqboricua4@hotmail.com

Submission Content/Notes : I am a resident of the Seven Oaks-Evanswood neighborhood whose home is one block distant from the proposed Wayne Avenue Power Substation site. I write to ask that MTA keep OPEN the issue of what to do about the Power Substation on Wayne. It's not just us residents, but the County as well, that will benefit from preserving the character of our neighborhood by assuring a Substation location/design that's compatible with our area.

C.4

Purple Line FEIS - RECORD #610 DETAIL

Comment Date : 10/20/2013
First Name : Courtney
Last Name : Blenkinsop
Address : Dartmouth Ave
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : ccreek310@hotmail.com

Submission Content/Notes : We support mass transit projects like the purple line. However, we are concerned about losing tree canopy. Please try reduce the number of trees to be cut and replace ones that must be cut.

E.11

C.4

We are also concerned about the power substation to be located along Wayne Ave in Silver Spring. Please consider other locations for it outside the residential area or disguise it as a house that matches the neighborhood. Please, please, please do not simply "hide" it with a high fence.

Purple Line FEIS - RECORD #611 DETAIL

Comment Date : 10/20/2013
First Name : Kent
Last Name : Wood
Address : 4703 Morgan Drive
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address : kentswood@gmail.com

Submission Content/Notes : I am a frequent user of the Capital Crescent Trail in its present form and oppose the so-called Purple Line because it will undoubtedly destroy the urban resource that is the present trail. I do not live near the trail but am willing to go about a mile on foot through Bethesda to get to it because of the peace and quiet to be had when I arrive there. If the train is built I will never again go that distance to get to what will then be a noisy sidewalk alongside a train. It is not equivalent.

C.3

E.9

It is shocking to find this reality is completely suppressed in the FEIS. Let me only address noise. The Technical Report on noise in Volume III starts out acknowledging there is a trail now, but greatly understates its peaceful and park-like character and the broad use it currently enjoys by walkers, joggers, and bikers. After that initial acknowledgment the trail is never considered again in the Technical Report, as if mentioning it once did it full justice. One would expect to see numbers representing the contrast between the present quiet and the future noisy situation on the trail but there are none. This is a clear, and most likely deliberate, omission. The present quiet is never quantified with noise level measurements because the No-build Option is entirely excluded from the noise study, and only No-build would leave the trail as it is! Then, the future environment of the replacement sidewalk alongside the train is also never evaluated because exact specifications for a future replacement trail are not available! Astoundingly, both present quiet and future noisy conditions manage to escape evaluation, even though this must be the greatest noise-impact consequence to having the train!! The places where noise is measured are all more than 30 feet from the train and many are 200 feet from the train, without a single data point in the trail zone. The noise impact on the trail is such an obvious thing to evaluate properly that I cannot believe this is an innocent omission. One has to read the noise study several times to appreciate that the present serenity is swept out of the study by the deceptive statement that the No-build option will not be evaluated. Another point regarding the future situation is that the replacement trail is slated to be inside the noise reduction wall. A fair presumption is that, if that wall reflects sound back from the adjoining neighborhoods, then it will actually intensify noise on the trail, making it noisier than it would be without the wall, but again this is not evaluated. There is also nothing in the study to prove that trail use would even meet safety standards, much less quality of life standards – the top noise levels from wheels and horns as experienced at the future trail are a serious concern. Frankly I would not be surprised if there were a cynical strategy to “discover” the safety issue at some later date and then use it to declare that an unsafe replacement trail should not be built at all. Overall, the treatment of the destruction of our Crescent Trail parkland is beyond being some mere deficiency. It is an outrage.

D.5

I believe the entire FEIS should be thrown out. I have stated my personal top objection to keep this short but there are many similar objections that could be made and I hope others make those objections. Somebody needs to step up and declare the FEIS a fiasco.

Purple Line FEIS - RECORD #612 DETAIL

Comment Date : 10/20/2013

First Name : Sara

Last Name : Cavendish

Address : 8304 Oakford Place

City : Silver Spring

State : MD

Zip Code : 20910

Email Address : sara.cavendish@yahoo.com

Submission Content/Notes : As longtime residents and Metro riders, we would like a stop at Dale Drive to be constructed when and if the Purple Line is initially constructed rather than delay until some later date. Thank you.

A.1

F.1

Purple Line FEIS - RECORD #613 DETAIL

Comment Date : 10/20/2013
First Name : C.
Last Name : Roy
State : MD
Email Address : parkear2@yahoo.com

Submission Content/Notes : This Purple Line is is an appalling idea and will devastate the Capital Crescent Trail! I have attended the public meetings and as a Montgomery County home-owner in the Chevy Chase area, I do NOT want this monstrosity near my home and I do NOT support the County Executives who are behind this plan. I frequent the trail regularly and access to it was one of the main reasons for my home purchase. This plan is vile - it will destroy significant greenspace which thousands of residents enjoy on a regular basis, in addition to other devastating effects. --Every time a new train line is connected to the red line, an increase in crime is seen in those connecting stations (e.g., Fort Totten, Gallery Place). The Purple Line is a bad plan, from every angle!

C.3

E.2

Purple Line FEIS - RECORD #615 DETAIL

Comment Date : 10/21/2013
First Name : Debra
Last Name : Turkat
Address : 3587 Hamlet Place
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address : dsturkat@gmail.com

Submission Content/Notes : NO PURPLE LINE:

- * In a triage of our traffic mess, this money would be more efficiently and effectively spent to relieve north-south traffic issues;
- * This is a blatant display of the unbalanced influence local developers have over our local legislators
- * The FEIS traffic analyses are skewed to show greatly exaggerated results
- * Removing a public park, used by a large percentage of our population, is unjustified relative to the results the PL is purported to achieve.

B.2

B.1

C.3

Purple Line FEIS - RECORD #616 DETAIL

Comment Date : 10/21/2013
First Name : Valarie
Last Name : Barr
Address : 2209 Richland PL
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : valarie_barr@hotmail.com

Submission Content/Notes : I am a resident of Rosemary Hills which borders the Purple Line as it passes from Silver Spring to Bethesda. I would like to make six comments on the Purple Line FEIS as it applies to that section. First, I believe that the new, very short ramp that will connect Brookville Road to the storage facility in Lyttonsville will substantially harm Lyttonsville, which I believe is an “Economic Justice” community, entitled to special considerations. That ramp will connect to the south side of Brookville Road to the east of Lyttonsville Place bridge, descend from there and turn right to parallel the Purple Line at the station and enter the yard under the Lyttonsville Place bridge. This design places the access road at the corner of Lyttonsville Place and Brookville Road, between the road and Lyttonsville Station. The current design makes future development of that corner virtually impossible. If the immediate area is re-zoned commercial/residential as a result of the upcoming Sector Plan rewrite, as is likely, that corner could be used for a small plaza containing a bike parking lot and/or retail outlets serving the community and the station. A ride share facility at this location would allow PL riders to rent bikes at Lyttonsville Station to ride Rock Creek Park. Retail space serving the commuter line and the community could serve as an anchor for further development. I think that this access road should be abandoned and replaced by a ramp that accesses the yard from its west side. Placing the access road east of the bridge will make it difficult to provide these amenities and make the future development of that area more difficult. A western access road that would not negatively affect the community and help preserve its options for future development.

E.9

Second, I am worried that noise from normal operations might negatively affect residents of the community at two points. First, as trains cross the at grade road crossing at Albert Stewart Ave., they will sound horns or bells to warn cross traffic. I worry that these noises will be heard in the houses on Stewart Lane. I think that steps should be taken to mitigate this noise. Given the fact that the houses on Stewart Lane are on a rise and are high above the tracks I believe that sound walls might not be effective. Instead, I think that it would be better to plant trees along the trail from Albert Stewart Ave west to well past Stewart Lane. It is possible that new apartments will be built just south of this area and so the tree line should be extended as far as possible to the west. Moreover, this is a relatively narrow area that, I was told by residents, had been the path of a stream. Currently, it floods during rainy periods. Therefore, in addition to the trees, the area might be completely converted into a small trail side park/wetland whose soft surfaces might help quiet the traffic noise while providing more natural habitats, and provide for efficient ground water management, while enhancing the experience of those walking the trail. Second, I am worried about noise negatively affecting residents of the Roundtop Apartments. These apartments are to the west of Lyttonsville Place Bridge and are very close to the Purple Line tracks (which border the apartments on their north side) and the storage facility. They would likely be affected by the passage of PL trains. I suggest that sound walls be built to mitigate that noise.

C.4

Third, I urge that the TPSS shown to the east of the end of Kansas Ave. and to the south of the Purple Line be moved to the north side of the tracks. The south side is a residential area, while the north side is an industrial area. The area to the north side is in a “Y” between the PL tracks and the CSX tracks and is unlikely to be redeveloped. The TPSS will not be out of place there. The area on the south side is a residential area and the Purple Line plan may be redesigned to allow trail access from Kansas Ave. The TPSS would be more appropriately sited on the north side.

Fourth, I do support making the trail accessible from Kansas Ave.

C.3

Finally, I support the Purple Line's attempt to acquire land from CSX to provide room to finish the Capital Crescent Trail to allow a walker/biker path from Silver Spring to Bethesda.

E.14

Thank you for your careful considerations of these points. Through their hard work the Purple Line Project managers and engineers have been able to make numerous improvements to the design as it affects the Rosemary Hills/Lyttonsville community. Those changes will help make our community more livable and vibrant. The changes that I have here suggested are minor relative to those earlier changes, but I think that they are important to insure that the community can fully benefit from the building of this project.

Purple Line FEIS - RECORD #617 DETAIL

Comment Date : 10/21/2013
First Name : Greg
Last Name : Lewis
State : MD
Email Address : lewisying@starpower.net

Submission Content/Notes : Reject the Purple Line proposal. The MTA's own analysis demonstrates that, from a transportation and environmental perspective, a bus rapid transit system is a more efficient system for transporting people than the proposed Purple Line. The infrastructure required for the Purple Line will destroy highly valued tree canopy across the proposed route and the highly used Capital Crescent Trail. Montgomery County is planning to implement a bus rapid transit system elsewhere throughout the county, and it makes no sense to add a different transportation system just to serve the proposed Purple Line route. The gross waste of tax dollars is reason enough to reject the Purple Line, but the environmental impact makes pursuing this project unforgivable.

C.1

C.3

E.11

Purple Line FEIS - RECORD #618 DETAIL

Comment Date : 10/21/2013
First Name : Jason
Last Name : Stanek
Address : 6401 Good Luck Road
City : Riverdale
State : MD
Zip Code : 20737
Email Address : jasonmaxstanek@gmail.com
Submission Content/Notes : FEIS Comment File

Situating the track alignment right down the middle of Kenilworth Ave (the segment between 410 and River Road in Riverdale) is a bad idea.

C.2

FTA/MTA got it right the first time and should adhere to the original proposal to have the track alignment along the west-side of Kenilworth Ave, despite the fact that some outdated commercial properties would be permanently displaced.

Please consider reverting to your original proposal and keep the tracks off Kenilworth Avenue.

Purple Line FEIS - RECORD #619 DETAIL

Comment Date : 10/21/2013
First Name : Jenny
Last Name : Love
Address : 607 DARTMOUTH AVE
City : SILVER SPRING
State : MD
Zip Code : 20910
Email Address : jenniferalove@gmail.com
Submission Content/Notes : Please keep the issue open of what to do about the Power Substation on Wayne Ave. We need a design that maintains the aesthetics of the neighborhood and contributes to the positive growth of Silver Spring.

C.4

Purple Line FEIS - RECORD #620 DETAIL

Comment Date : 10/21/2013
First Name : Fabian E
Last Name : Soria
Address : 618 Greenbrier Dr
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : loro_soria@hotmail.com

Submission Content/Notes : My wife and I recently moved to Silver Spring a couple of month ago. Since the property was close to Wayne Ave, we inquired about the impact that the Purple line could have - we reached out find out about this, and we were told that the noise wouldn't be too bad to become an issue for the property.

A few months after we moved in, we discover (much to our surprise), that there is a planned Track Power Substation RIGHT ACROSS our home. When we were in the process of buying a home where our yet-to-be born baby would grow, nobody mentioned this to us.

C.4

We fear about the impact that such substation could have for our home as well as for the whole neighborhood. Some of the options that are being considered would have a very negative impact on our lives, and therefore we would like to request MTA to keep OPEN the issue of what to do about the Power Substation on Wayne ave. I think that there are good options that have not been explored yet, and we urge MTA to consider the impact on he communities.

Purple Line FEIS - RECORD #621 DETAIL

Comment Date : 10/21/2013
First Name : Andrew
Last Name : Vincent
Address : 606 Cloverfield Place
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : avsspam@gmail.com

Submission Content/Notes : I am a resident of the Seven Oaks-Evanswood neighborhood whose home is one block from the proposed Wayne Avenue Power Substation site. I write to ask that MTA keep OPEN the issue of what to do about the Power Substation on Wayne. I am concerned over potential negative impacts to my property value from the location and current proposed design of this substation. Thank you

C.4

Purple Line FEIS - RECORD #622 DETAIL

Comment Date : 10/21/2013
First Name : Margaret
Last Name : Everson-Fisher
Address : 2605 Ross Road
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address : milesmef@aol.com

Submission Content/Notes : As a resident in the Rock Creek Forest area, the Purple Line will more than likely devastate the quality of life in this area. We already endure terrible congestion and the Purple Line along with the additional businesses to be developed will only heighten the problem. For example, if the trains are going to be crossing over major roads such as Connecticut Avenue and Jones Mill Road, the already substantial back-up will only be made worse as traffic will be delayed due to crossing trains. Those that currently use these two thoroughfares in the morning and evening are not going to be the ones to use the Purple Line. The situation is already bad enough within the Beltway -- why not consider some kind of parallel system outside the Beltway such as setting up a separate bus lane with an increased number of buses? Safety concerns cannot be ignored due to the potential in increased traffic.

C.1

C.2

D.2

Purple Line FEIS - RECORD #623 DETAIL

Comment Date : 10/21/2013
First Name : Paul
Last Name : Weidow
State : MD
Email Address : pweidow@gmail.com

Submission Content/Notes : The FEIS is severely flawed. It does not consider the trail an invaluable recreation area with its 20 acre forest an irreplaceable natural resource. This stretch has been used as a park for over 20 years and there is no understanding or consideration of how invaluable it is in people's lives.

E.5

C.3

Another flaw in the document is its failure to recognize the noise disturbance a walker, runner or biker will endure alongside trains traveling 50mph. The peaceful tranquil setting it is today will be harmfully impacted by a train sound 200 times a day. This is what an environmental impact statement is supposed to point out, but this one doesn't.

E.9

B.1

We envision a world class trail and park system from Georgetown through Bethesda and connecting into downtown Silver Spring. We need more trails for biking, running and walking throughout our neighborhoods, not less! Lastly, NO ONE WILL USE THIS RAIL LINE! Much like the Inter County Connector, this is a colossal waste of taxpayer money, and grave damage will occur to the environment.

K.5

Purple Line FEIS - RECORD #624 DETAIL

Comment Date : 10/21/2013
First Name : Alex
Last Name : Papageorge
State : MD
Email Address : ap52x@nih.gov

Submission Content/Notes : The proposed location of the Bethesda Purple Line Station is three blocks distance from the Bethesda Multi-Modal Transit Center for Metrobus and Ride-On bus connections. Approximately 30% of Purple Line passengers will require bus connections.

C.2

Therefore, the Bethesda Purple Line terminus will fail these passengers who will not / cannot walk three blocks between connections. The MTA has refused to address this transfer connectivity problem.

The Bethesda Purple Line Station location will fail ADA requirements for passengers transferring to buses.

Purple Line FEIS - RECORD #626 DETAIL

Comment Date : 10/21/2013
First Name : Robert
Last Name : Lederman
Address : 3916 Underwood Street
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address : robert.lederman@gmail.com

Submission Content/Notes : I have read the FEIS.
I believe federal environmental approval should not be granted.
- Promises made to the community have not been upheld as the project evolved (preservation of trees, preservation of trail, preservation of at-grade crossing for our students, etc). We feel this reflects a degree of disingenuousness from the project management team.
- This environmental overdevelopment is not matched by infrastructure enhancement to our schools, which already are overcrowded.
- Power substations are undesirable in these densely populated communities.
- Ridership exaggeration and overall poor project planning and management and execution suggest a high risk of adverse environmental impact.

J.2

C.4

K.5

Please do not allow this project to proceed.

Purple Line FEIS - RECORD #627 DETAIL

Comment Date : 10/21/2013
First Name : Shane
Last Name : Farthing
Business/Agency/Association Name : Washington Area Bicyclist Association
Address : 146 U Street, NE
City : Washington
State : DC
Zip Code : 20002
Email Address : shane@waba.org
Submission Content/Notes : Dear MTA:

A.1

WABA supports the Purple Line project because we believe it presents the most viable option for the improvement of the Georgetown Branch/Capital Crescent Trail connection between Bethesda and Silver Spring. The resulting paved trail with improved, grade-separated crossings of major arterials has long been the promise of this project for those members of the community who travel by bicycle. Therefore, we are pleased to see the long-awaited completion of the FEIS.

C.3

However, we are deeply concerned at the treatment of the trail in the FEIS. Rather than embracing the trail as an integral part of the work of all parties, MTA acknowledges a willingness to pursue only a single off-road and grade-separated alignment, before reverting to the lowest common denominator alternative of an "on-road trail." This is insufficient.

The trail component is integral to the project, and MTA must cooperate with MCDOT and other stakeholders to ensure appropriate collaboration on project goals, timelines, and deliverables to ensure that a paved, traffic-separated and grade-separated trail connection between the two downtowns is completed.

Therefore, we insist that the trail component of this project be given more than a single-shot attempt before MTA passes all responsibility to others. MTA must accept its responsibility for ensuring that an appropriately designed trail is integrated into the design, as must MCDOT and other entities.

We continue to support the Purple Line, but that support is largely due to the promise the Purple Line represents for the accompanying trail connection. It is the responsibility of MTA, as the lead agency of this project, to work with other necessary stakeholders to ensure that a paved, grade-separated trail results.

Commitments to the creation of a paved, separated trail have been made repeatedly by MTA representatives in statements and in renderings, and such commitments should similarly be included in the FEIS.

Sincerely,

Shane Farthing
Washington Area Bicyclist Association

Purple Line FEIS - RECORD #629 DETAIL

Comment Date : 10/21/2013
First Name : John and Dianne
Last Name : Keppler
Address : 7508 Lynn Drive
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address : dmkeppler@yahoo.com
Submission Content/Notes : Dear Sir/Madam:

C.3

We write as property owners whose home sits adjacent to the proposed path of the Purple Line train. Our home is located on Lynn Drive, next to the access path between Lynn Drive in the Town of Chevy Chase and the Capital Crescent Trail. As property owners who live along the trail, it will come as no surprise that we, like thousands of others, enjoy the Capital Crescent Trail and want it to stay a trail without a train. Having said that, we understand that others in the community want a Purple Line train, so a train on the Capital Cresecent Trail may, in fact, be coming.

D.5

We have two concerns about the Purple Line FEIS. First, we believe it is important for there to be a safe, convenient crossing between Lynn Drive and the Capital Crescent Trail. We see hundreds of high school kids cross the trail every school day, walking between the Town and Bethesda Chevy-Chase High School. It would be negligent not to provide a safe means of passage across a train track between a neighborhood of 1,000 homes and the local public high school. Failing to do so will certainly result in kids running across the Purple Line tracks in between trains - and risk the lives of our kids.

E.3

Second, we are concerned that the Maryland Transit Administration is not being forthright about how many properties it will need to take for construction, whether partially or entirely. Our home is 20 feet from the trail, and only approximately 60 feet of trail lies between it and the Regent condominiums on East West Highway. We find it incredible that our property, located at such a narrow choke point on the trail, will remain unaffected by construction of the train – particularly because in January 2012, MTA released a list of properties, including ours, at risk for condemnation. While MTA claims that the 2012 list was inaccurate and Michael Madden of MTA has told us that MTA "will not touch" our property during construction or after, we are concerned that MTA is playing fast and loose with property owners, limiting the number of properties it acknowledges it will have to take in order to keep its stated construction costs down. We are afraid that we, and other property owners like us, will only receive notice from MTA that our properties are being condemned long after construction has begun and as the wrecking balls are hanging over our homes.

We urge MTA to be forthright about its plans for condemning property along the path of the train and include the cost of all potential property takings in its cost estimates. Otherwise we – and the private entities who are being asked to help fund construction of the train – will be sorely surprised by MTA's last minute property takings and gross under-estimation of construction costs.

Sincerely,
John and Dianne Keppler

Purple Line FEIS - RECORD #630 DETAIL

Comment Date : 10/21/2013
First Name : Reed
Last Name : Dewey
Address : 4618 Derussey Parkway
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address : reed-dewey@verizon.net

Submission Content/Notes : I am very opposed to running the Purple Line along the Crescent Trail. It is a natural and priceless natural resource that once gone can never be brought back. Please look at other routes, like East West Highway, where there is even more density. Please don't let Chevy Chase Land Trust push their desire to add value to their land for their own narrow interests. We will fight this however we can to preserve this trail for future generations.

C.3

C.2

Purple Line FEIS - RECORD #631 DETAIL

Comment Date : 10/21/2013
First Name : Phil
Last Name : Downey
Address : 510 Ashford Rd.
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : phildowney.jr@gmail.com

Submission Content/Notes : I want to voice strong support for the proposed Purple Line stop at Wayne and Dale. I've lived within 3 blocks of the proposed stop for close to 30 years. If we're going to build the Purple Line, I want to maximize the benefit for myself and my neighborhood and be able to walk to a nearby stop. Otherwise it's all pain and no gain. Any so-called community association opposing the stop does not speak for me.

A.1

F.1

Purple Line FEIS - RECORD #632 DETAIL

Comment Date : 10/21/2013
First Name : Bill
Last Name : Felling
Address : 5113 Wilson Lane
City : Bethesda
State : MD
Zip Code : 20814
Email Address : bill_felling@jsi.com

Submission Content/Notes : I wanted to thank you for your thoughtful work on the benefits and impact of the new purple line, and to provide a counterpoint to some of the voices which will be raised in opposition to any effort to change the capital crescent trail. I believe the proposed changes to the undeveloped section of the trail will in fact enhance it's use and availability, and applaud your efforts to mix rail and trail.

A.1

C.3

Purple Line FEIS - RECORD #633 DETAIL

Comment Date : 10/21/2013
First Name : Ken
Last Name : Harrison
Address : 8701 Susanna Ln
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address : ken.harrison@gmail.com

Submission Content/Notes : 1) Where is the loss of a wildlife corridor mentioned in the EIS? The wildlife corridor from Rock Creek to the C&O canal will be broken with this project. We may get the transportation corridor with connecting walkways connecting stations but the wildlife corridor will certainly be lost. I was surprised to not see this highlighted in an environmental impact statement.

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2) The current trail is a park in every sense of the word. My guess is that it is one of the most efficient parks around, in terms of the number of people using it any point in time for the given area. I do not see reference to the loss of this park anywhere in the EIS. There is just fuzzy reference to the alternatives leading to further park loss from growth. The new trail will not be a park as much as a way to get to a neighboring station, which is not the same.

E.5

3) The removal of the current trail will be a tremendous loss to the community. This cannot be overstated. By my assessment as a frequent walker on the trail, I am continually surprised how many commuters/joggers/families/wildlife use this trail. Aside from our family being personally impacted by a takings of the corner of our backyard, we will more dearly mourn the loss to our community. It connects us, both physically and in our hearts, to our elementary school (Rosemary), downtown Bethesda (where we magically pop out), to the Bethesda pool where we swim, to our local bagel/coffee shop. It is really in many ways the heart of the community and we will mourn it. This should be clearly articulated. To think of it as a biking trail or jogging path alone is not getting it right.

Purple Line FEIS - RECORD #634 DETAIL

Comment Date : 10/21/2013
First Name : Cynthia
Last Name : Green
Address : 5512 Westbard Avenue
City : Bethesda
State : MD
Zip Code : 20816
Email Address : cpgreen@verizon.net

Submission Content/Notes : The FEIS misses some key issues--noise, loss of tree cover which could affect ambient temperature, the danger of the trains to pedestrians on the narrow strip of trail left, and loss of wildlife habitat. The claims of little impact are not substantiated by data.

C.3,

D.5

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E.11

Purple Line FEIS - RECORD #635 DETAIL

Comment Date : 10/21/2013
First Name : Penina
Last Name : Maya
Address : 4321 Rosedale Ave.
City : Bethesda
State : MD
Zip Code : 20814
Email Address : peninamaya@gmail.com

Submission Content/Notes : Bulldozing nearly 20 acres of mature forest in our densely populated area of Montgomery County would be devastating to our precious community resource, the Georgetown Branch of the Capital Crescent Trail. PLEASE do not destroy our beloved park! Once the trees are clear-cut, they cannot be replaced due to the overhead wires the Purple Line would require. PLEASE follow the example of Justice W. Douglas, who years ago wisely understood that the C and O Canal park was an irreplaceable and special place, worthy of preservation for generations to come. We and our children need quiet, green places! We should not have to drive to those peaceful places when today so many can bike or walk to the beautiful green Trail. Please reconsider the other available options for transportation in our region. Thank you. Penina Maya, East Bethesda

C.3

E.11

Purple Line FEIS - RECORD #636 DETAIL

Comment Date : 10/21/2013
First Name : S.P.
Last Name : Manion
Address : 7711 Radnor Road
City : Bethesda
State : MD
Zip Code : 20817
Email Address : sp.mann@live.com

Submission Content/Notes : The AA/DEIS contained incorrect information, as it was a boilerplate for a South Florida transit project. As presented to the public, the assertions in the AA/DEIS failed to address that the Georgetown Branch right of way while being 60 feet wide was only 18- 20 feet wide at the top of the railway embankment that supported a single line track. To develop a 60 foot double line track at least 150 if not 180 feet of developed width are required for safe construction. This is also not addressed in the FEIS, other than a short mention of the construction impacts and finally admitting that eminent domain purchases will be necessary. In the AA/DEIS, the cost of the project was exponentially understated, which assisted in the selection of the particular path for the Purple Line. In the FEIS, the costs are beginning to address reality, however the costs for the aerial structures, are still understated. Also the environmental unavoidable and permanent consequences are also not clearly presented in either the AA/EIS or the FEIS, as they will be severe in particular areas, bridges over waterways and where the clear cutting of indigenous forests has to occur to accommodate the 150-180 foot width necessary for construction. The AA/EIS never considered an alternative of a street rail. BRT was considered, and dismissed, even though it offered an considerably less costly option that achieved the same effect. If rail was the preferred transit means, why not include a street rail option, which would be more costly than BRT, but achieve the more appealing rail transit on an existing developed street instead of land that has been used as a natural parkland for decades, surrounded by an indigenous forest. It is discouraging to note that decisions are pre-determined, and that an DEIS and FEIS would be presented that avoid stating facts, and gloss over the long-term environmental impacts which will be cumulative, unavoidable and permanent. This includes the loss of trees, the reduction in air quality, the increase in noise pollution, the increase in air pollution, the decrease in waterway quality from the loss of tree cover and the eradication of all wildlife along the wooded areas that now exist. Nor do either the AA/EIS or the FEIS address the real impact of construction on the region, with the loss to the economy with the traffic stoppage at all the major roadways that will be affected with the construction of bridges. The exercise of public comments and the prior process of the AA/EIS are clearly palliatives to the public, as the choice was always a foregone conclusion, with little regard to the public, the environment, neighborhoods which will be severed, homes and other buildings that have to be demolished and the general discomfit of the public at large by the years of construction, which will be double that stated, not to mention the cost which will be exponentially higher than stated in the AA/EIS and multiples higher than stated in this FEIS.

C.2

K.2

C.1

C.3

G.1

E.4

J.2

Purple Line FEIS - RECORD #637 DETAIL

Comment Date : 10/21/2013
First Name : Daniel
Last Name : Leggett
Address : 3613 Chevy Chase Lake Dr.
Apt./Suite No. : 2
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address : dleggett@rcn.com
Submission Content/Notes : The Georgetown Branch Interim Trail is a park in fact and should be included as a Section 4(f) property.

C.3

E.5

The FEIS Chapter 4, Environmental Resources, Impacts, and Mitigation, p 6-20, Table 6-4 Section 4(f) Properties Identified in the AA/DEIS Not Used by the Preferred Alternative lists the Georgetown Branch Interim Trail (GBT) as an excluded property. The reason for the exclusion is essentially that this property was designated for transit in 1995. However, the GBT east of Wisconsin Ave. has the same history and usage as the Capital Crescent Trail west of Wisconsin Ave. yet a higher standard of environmental impact review would be applied if Capital Crescent Trail were impacted by a transportation project. The GBT is consists of about 20 acres characterized by mature trees and a natural setting, yet it is surrounded by an urban environment. It is used by thousands of people every day for recreation and human-powered transportation. To say that this is not a park, just like the Capital Crescent Trail, because of an arbitrary designation as a future transit corridor 18 years ago violates the intent of an Environmental Impact Statement. The GBT is a park-in-fact and should be subject to the same level of environmental review as if the GBT were a designated park.

Purple Line FEIS - RECORD #638 DETAIL

Comment Date : 10/22/2013
First Name : Neil
Last Name : Tender
Address : 4808 Moorland Ln.
Apt./Suite No. : 905
City : Bethesda
State : MD
Zip Code : 20814
Email Address : neiltender@yahoo.com

Submission Content/Notes : I am opposed to building the Purple line along the Georgetown Branch Trail because I am a heavy recreational user of the trail. I have lived in downtown Bethesda since 1998 and it is a very scenic and pleasant park setting for myself and thousands of others I share it with, especially those who live in an urban setting.

C.1

B.1

E.11

B.1

C.2

C.1

K.5

In the hot summer months, the mature tree canopy provides shade that makes it bearable to run. The crushed gravel surface is ideal for running. There is no other place to do this.

I was around to see the Georgetown Branch Trail get paved, the Wisconsin Avenue tunnel get opened, and the trestle get renovated. These were expensive projects payed for by taxpayer dollars. At no point were these improvements advertised as "temporary". I welcomed all of these trail upgrades and the Georgetown Branch Trail was a major factor for choosing the move to and remain in Bethesda. It feels like betrayal that this beautiful trail and all of these improvements are considering being ripped out now. The new trail will be good for commuters but terrible for the many recreational users such as myself due to the loss of the scenic tree canopy, 4 foot high retaining walls blocking views, and a fence on the other side making it feel very constrained and claustrophobic. The trains will be noisy and it will no longer feel tranquil, peaceful, and secluded.

In the AA/DEIS comments and responses, I don't see any place where these concerns are addressed.

I strongly recommend alternatives be considered other than the Georgetown Branch Trail between Bethesda and Silver Spring.

Purple Line FEIS - RECORD #639 DETAIL

Comment Date : 10/22/2013
First Name : Neil
Last Name : Tender
Address : 4808 Moorland Ln.
Apt./Suite No. : 905
City : Bethesda
State : MD
Zip Code : 20814
Email Address : neiltender@yahoo.com

Submission Content/Notes : I have read through the entire FEIS document, and I am still having trouble understanding the motivation for the Purple Line. The document feels very biased towards the proposed Purple Line corridor as if it is a forgone conclusion that it will be built. The alternatives and public concerns do not seem to get fair treatment. I believe it is a solution looking for a problem. For sure the traffic is bad in the Purple Line as it is all over the region, but it's not convincing that spending \$2.2 billion on the Purple Line puts the money where it is most effective.

I have to challenge some of the projections used to justify the Purple Line. For example, 14,990 daily boardings to the Bethesda Purple Line station by 2040? Really? The Bethesda MetroRAIL only gets 10,608 daily passengers today! Hard to believe the trolley will get 40% more than rail even in 25 years. The population of the Bethesda and Silver Spring CBDs will nearly double by 2040? That seems so hard to believe. For Bethesda to grow from 13,949 to 24,827 would require dozens of new high rise apartments.

Just what problem is the Purple Line trying to solve? The FEIS indicates that a Bethesda-Silver Spring commute will improve from 17 minutes (for no build scenario) to 9 minutes (for Purple Line) and that a College Park-New Carrollton commute will improve from 20 minutes to 16 minutes. What's the problem here? 20 minutes is a great commute!!! This area is already well served by an extensive bus network and it shows. It can be easily argued that many of the car-less residents choose to have no car for this very reason, or choose to live in the region because they don't require a car (perhaps it is a financial strain).

The biggest traffic problem is still the inbound-outbound corridors. I-270, I-95, BW parkway are all jammed during rush hour and I see no efforts to improve this. How about someone who drives to a park-and-ride, takes a bus to the Shady Grove metro, and then rides 45 minutes downtown! Now that is the real problem. The FEIS indicates that most trips in the Purple Line Region are short ones anyway. Few people would take it from Bethesda to New Carrollton, and that trip is almost as fast on the EXISTING metrorail system even going through the city!

The Purple Line brochures, FEIS, and web page all read like marketing material, with clever purple fonts as if they are trying to sell something. But if there was truly a strong need and interest for the Purple Line, this wouldn't be necessary, the public would demand it. I don't see that happening.

Please seriously reconsider using these funds for another transportation project that will have a greater impact. The problems in the Purple Line region can be largely improved through low cost conventional means, such as expanding and improving existing bus service, HOV lanes, bike trails/bikeshare, road improvements, etc...

Purple Line FEIS - RECORD #640 DETAIL

First Name : Marsha A
Last Name : Francis
Email Address : beardiechick@hotmail.com

Submission Content/Notes : The FEIS is flawed!! It does NOT consider the trail an invaluable recreation area with its 20 acre forest an irreplaceable natural resource. It fails to recognize the noise disturbance/disruption that will raise the decibel level to unacceptable levels--frightening the natural forest inhabitants, the tranquility of the residents who border the trail, and the bike riders/walkers who daily use the trail to have a few tranquil moments to escape from the noise/pollution and din generators of any motorized/mechanized intruders.

C.3

E.9

Marsha A. Francis

Purple Line FEIS - RECORD #641 DETAIL

First Name : Shirley and Marshall

Last Name : Keys

Email Address : SMKEYS@COMCAST.NET

Submission Content/Notes : The Capital Crescent Trail should be re-classified as a National Park and then established as a National Treasure. Numerous buildings are named "national treasures" but have little impact on the lives of the surrounding neighborhoods. The Trail contributes on a daily basis to the quality of life in Montgomery county and to the State of Maryland. Let's preserve this precious resource!

C.3

E.2

Purple Line FEIS - RECORD #642 DETAIL

First Name : Anne-Marie
Last Name : Fiala
Email Address : afial001@yahoo.com

Submission Content/Notes : I would like to see Montgomery County be trail blazers and turn the trail into a commuter bike path complete with bike stations and low energy lighting for early morning/early evening commuters, water fountains, and snow clearance in the winter. Now that would be REAL green transportation, not ripping out trees and placing tracks through neighborhoods for loud, expensive trains. If Madison Wisconsin can do it with their winters, so can Montgomery County
<http://www.cityofmadison.com/bikemadison/>

A.2

C.3

E.11

Purple Line FEIS - RECORD #643 DETAIL

First Name : Karen
Last Name : FitzGerald
Email Address : kefitzgerald@gmail.com

Submission Content/Notes : To the MTA,
I live in the Seven Oaks-Evanswood neighborhood in Silver Spring. I am writing to ask that the MTA keep OPEN the issue of what to do about the power substation along Wayne Avenue. An above-ground substation, as is currently under discussion, is not compatible with the residential character of our neighborhood. By keeping the issue, open all parties will have a chance to come to agreement on this matter and to find a solution that is right for our neighborhood.

C.4

Sincerely,
Karen FitzGerald

Sent from my iPad

Purple Line FEIS - RECORD #644 DETAIL

First Name : Mary S.

Last Name : Rivkin

Email Address : rivkin@umbc.edu

Submission Content/Notes :

Attachments : Response to FEIS by Rivkin and Williams re trestle bridge.docx (13 kb)

October 21, 2013

Via Electronic Submission (FEIS@purplelinemd.com)

TO: Maryland Transit Administration and Federal Transit Administration
FROM: Mary S. Rivkin and Lynda Williams
RE: Purple Line—Final Environmental Impact Statement And Draft Section 4(f)
Evaluation

The Historic Railroad Trestle Bridge over Rock Creek—4(f) property

It is not clear how the century-old railroad trestle bridge escaped designation as a 4(f) property.

E.6

Its sturdy design and workmanship are inspiring. And indeed with the Trail bridge on top,

H

creating a walkable surface, it offers a beautiful view of Rock Creek and its surrounding forest.

The two new bridges that will replace it, one 10-15 feet lower and the other 30 feet lower, and crossing each other in the middle will drastically and irrevocably alter the views, both from below on the Rock Creek Trail and from above on the dual bridges. So omitting any discussion of the historic bridge is an oversight in the FEIS.

The oversight should be remedied.

Purple Line FEIS - RECORD #645 DETAIL

First Name : Mary S.

Last Name : Rivkin

Email Address : rivkin@umbc.edu

Submission Content/Notes :

Attachments : Response to FEIS health and safety of children by Rivkin-individual.docx
(29 kb)

[Type text]

October 21, 2013

Via Electronic Submission (FEIS@purplelinemd.com)

TO: Maryland Transit Administration and Federal Transit Administration
FROM: Mary S. Rivkin
Re: Purple Line—Final Environmental Impact Statement And Draft Section 4(F) Evaluation.

Safety and Health of Children Disregarded in FEIS

I appreciate the opportunity to respond to the request by the MTA and FTA for comments on the FEIS for the Purple Line.

I am an associate professor of education at the University of Maryland, Baltimore County, and dedicated to the health and welfare of children. This concern prompted me as a board member of the Friends of the Capital Crescent Trail (FCCT) to request from MTA and Montgomery County a Health Impact Assessment (HIA) for the Purple Line. This request was denied. Even though the Environmental Protection Agency (EPA) calls for a HIA when a project is subject to environmental justice concerns—69% of the Purple Line is slated for environmental justice areas—the request was denied. Furthermore the Association for Public Health (APHA) has issued a policy statement calling for health impacts to be considered in all public projects. The effect of large transportation and other projects in densely populated areas has become too conspicuous to ignore, but our request was denied. This is regrettable because it limits the scope and thus value of the FEIS. A supplemental FEIS is needed.

My reading of the FEIS finds that it pays scant heed to the needs of children, for safety and for overall health.

D.5

Safety. The FEIS does state that numerous children cross the Georgetown Branch Trail to attend Bethesda-Chevy Chase High School and that consideration has been given to creating a safe passage at Lynn Drive. But the FEIS fails to mention the proximity of Lourdes Elementary, North Chevy Chase Elementary, Rosemary Hills Elementary, and two Bethesda child care centers which are immediately adjacent or one or two blocks away from the Trail. Nor does it mention that children often walk or bike to two schools on the western portion of the Capital Crescent Trail (CCT), Washington Episcopal and Westland Middle schools. Westland Middle serves children all along the CCT and Georgetown Branch Trail. Montgomery County Public Schools participate in the FTA/MTA Safe Routes to Schools program but not for these schools. In their drive to validate the Purple Line, Montgomery County and MTA ignore the fact that the

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Capital Crescent Trail *is* a Safe Route to School. The Georgetown Branch part of it is three miles long with not a car in sight, lined with trees, and passes under two state highways (Rts. 410 and 355). It offers a safe and peaceful way to make the trip. As proposed, the Purple Line will add safety by a bridge over Connecticut Ave, and a tunnel under Jones Mill Rd, but take away safety at Wisconsin Ave (Rte 355) by requiring a 6-lane on-street crossing. The peacefulness is gone forever with 40 mph trains hurtling by constantly.

The other compelling safety issue is that created by trains themselves. Trains consider persons on the tracks as “trespassers” and Maryland is 5th in the nation for trespasser fatalities. A child or even an adult is no match for a vehicle at 35-45 mph. About 20 mph is the survive-a-hit limit. The trains on the Georgetown Branch Trail will be traveling in the 35-45 mph range.

Trains are a hazard to people. Adding fast trains to an increasingly congested area is dangerous. People cross tracks and walk along tracks, technically trespassers, but realistically just people trying to get from here to there, and for the Georgetown Branch using a familiar route. Statistics for Maryland on train-trespasser fatalities and injuries, 2009-11, show that of the 62 deaths and injuries, 9 were in Montgomery County (Federal Railroad Administration, Office of Safety Analysis.) Furthermore, nearly a third, 20 of the 62 deaths and injuries, were to young people ages 11-25. It is wrong to chance raising this regrettable number by running trains next to a high school with 2500 young people.

A supplemental FEIS would deal with these compelling safety issues more completely.

Health. When the original plan in the late 1980’s was approved, a general understanding of the benefits of nature to health existed. Since that time, as parks and open spaces have become more scarce in urban areas, researchers and policy makers have validated this understanding. See Frances Kuo, 2010, for a review of empirical research on health benefits of nature*. The American Public Health Association .in November will publish an even more current review as a policy statement.** The evidence is so strong that the American Academy of Pediatrics recommends that its members write prescriptions for time outdoors and in nature for children. Obesity, anxiety, and ADHD have been shown to be ameliorated by nature exposure.

When nature is “nearby”(within ½ mile), its benefits are available. When all the trees are clearcut, and there are trains rushing along, the current Trail will no longer be “nearby nature” but a shadeless noisy sidewalk. This nature trail will never be replaced. The peaceful indigenous forest is irreplaceable. No wonder the FEIS does not deal with mitigation of the forest. It cannot be done. It is inexplicable why public officials would want to take such a valuable resource away from the County’s children, particularly as the population of children steadily increases and the already small school yards in lower Montgomery County are used for classroom space.

E.11

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E.5

That both the State and County in other planning documents*** advocate for more park/recreation space for lower Montgomery County adds to the irony. Hard on the success of Governor O'Malley's success at planting A Million Trees, the County now has a Shades of Green initiative to subsidize more tree canopy for the Bethesda Central Business District (CBD), which is bisected by the Trail. Cut down all the big trees on the Trail and plant little ones in the CBD?

E.9

Finally, Rosemary Hills Elementary School borders the proposed Purple Line. The noise level will be detrimental to the children's learning. The school plans an extension in 2015 to deal with more population—the extension will be on the side closest to the tracks. Again, inexplicable.

The FEIS trivializes the health and safety of children. **A supplemental FEIS is required.**

References

*Kuo, F. M. 2010. *Parks and Other Green Environments: Essential Components of a Healthy Human Habitat*. Ashburn, VA: National Recreation and Park Association .

** Chawla, L, & Little, J. 2013. Improving Health and Wellness through Access to Nature. Policy Statement under review by American Public Health Association.

***Maryland Department of Natural Resources. 2009. *Maryland Land Preservation , Parks, and Recreation Plan, 2009*. Annapolis, MD: Author. And Montgomery Department of Parks and Montgomery Department of Recreation, 2012. *2012 Park Recreation and Open Space (PROS)*. Rockville, MD: Author.

Purple Line FEIS - RECORD #646 DETAIL

First Name : Kathee
Last Name : Baker
Email Address : baker.kathee@gmail.com

Submission Content/Notes : I love the trail just as it is -- green and natural. The trail provides a peaceful break from the hubbub of everyday living in the greater Washington, DC area. The very idea of the Purple Line makes me want to move out of Bethesda (and out of Maryland), where I was born and raised. When I've moved away from the area, I've always wanted to return to Bethesda. Not now with this possibility -- I can only think that anyone who wants this Purple Line will be making money from it. Shame on them.

E.4

Purple Line FEIS - RECORD #647 DETAIL

First Name : Katie
Last Name : Rosenberg
Email Address : Ktro@starpower.net

Submission Content/Notes : Don't cut the trees.
Fix the timing of the lights during rush hour.
Provide ride on transportation at jones mill and jones bridge to access the metro.

C.2

D.2

E.11

Purple Line FEIS - RECORD #648 DETAIL

First Name : Charlotte
Last Name : Cunningham
Email Address : charlotte.cunningham@rcn.com

Submission Content/Notes : The trail is the ONLY safe way to walk or bike into Bethesda from Chevy Chase and is used frequently. There are no sidewalks along East-West Hwy from Beach Drive to Brookville Road. My children rode their bikes to both Westland and BCC on this trail. If the Purple line is built, the trail will be ruined and it will not be safe for kids or adults to ride bikes or walk to Bethesda.

C.3

D.3

D.5

Purple Line FEIS - RECORD #649 DETAIL

First Name : Tom
Last Name : Edwards
Email Address : tomjedwards@netscape.net

Submission Content/Notes : I live very close to the proposed location of a TractionPower Substation (TPSS) at Cloverfield Road and Wayne Avenue. I understand the need for traction power along Wayne Avenue, and I support the work of the Seven Oaks Evanswood Citizens Association (SOECA) to explore alternatives instead of an above-ground placement of a TPSS in our residential area. SOECA has passed a resolution to this effect.

C.4

I ask MTA to keep this issue open and to work with the ResidentialWayne community to find an acceptable solution for a TPSS.

MTA has said that the Purple Line will have “Anextensive change to visual character constituting a high visual effect ... along Wayne Avenue.” (FEIS Table 4-1, p. 4-9, emphasis added)

To mitigate this effect, MTA says that it will “buildtraction power substations with landscaping or appropriate architectural treatments to be compatible with adjacent land uses in areas of moderate or high visual sensitivity.” (FEIS Table 4-1, p. 4-9, emphasis added)

I believe strongly that the plan for this TPSS – despite the late addition of some landscaping – is not in any way “compatible” without community.

Our neighborhood is the only 100% residential area along the entire PurpleLine route. Thus, I believe our community deserves a better solution for TPSS placement than those MTA has so far proposed.

I am a strong supporter of public transportation, and I want the Purple Line to demonstrate the creativity that can occur when stakeholders with varied interests – including MTA – work together to find a solution. Good solutions are possible. We just need more time to find them.

Thank you for your time and attention.

Tom Edwards
619 Greenbrier Drive
Silver Spring, Maryland

Email: tomjedwards@netscape.net
Phone: 301-565-3101

Purple Line FEIS - RECORD #650 DETAIL

First Name : Rhona
Last Name : Johnston
Email Address : tandrjohnston@aol.com

Submission Content/Notes : The Capital Crescent Trail is a peaceful oasis encouraging physical activity and connecting our community to others. An environment that contributes to stress reduction while allowing movement between communities should be protected. If trains and the associated noise and disruption move in the same space, the oasis provided by the trail will no longer exist. The loss of mature trees required by this project is sad and would have a negative impact on the environment.

C.3

E.9

E.11

Purple Line FEIS - RECORD #651 DETAIL

First Name : Sutonta
Last Name : Thumprasert
Email Address : kaisut@live.com

Submission Content/Notes : Dear Sir/Madam:

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E.7

I, Sutonta Thumprasert, have been the owner of Thai Derm Restaurant for 30th years. I am disappointed that the FEIS did not contain the information that I need to plan for my business. For instance, how will the noise and vibration effect my customers' enjoyment of their meals? >From pictures that I have seen, it appears that there are quite a few poles that will be needed on Bonifant Street. Most of the parking on Bonifant Street will be removed for the Purple Line and I will be more reliant on customers walking to my restaurant. If the poles or other support equipment makes the sidewalks crowded, it will discourage pedestrians from patronizing my restaurant. MTA has been very indifferent to these issue and I don't think that they understand business planning. Why wasn't any of this been addressed in the FEIS? I am requesting that MTA do the studies needed to get accurate information on noise, vibration and the visual look of Bonifant Street (poles, wires, support boxes) as soon as possible.
Submitted by:Sutonta ThumprasertThai Derm Restaurant

Purple Line FEIS - RECORD #652 DETAIL

First Name : Brad
Last Name : Shingleton
Email Address : gf4763@verizon.net

Submission Content/Notes : The proposed light rail would be financially irresponsible, unnecessary in light of alternatives, and would effectively destroy a great resource for folks who don't have many other trails like it.

A.2,

B.1

K3,

K.4

Purple Line FEIS - RECORD #653 DETAIL

First Name : Jeanette
Last Name : Honsa
Email Address : jmhonsa@msn.com

Submission Content/Notes : I support better transportation along the Purple Line route, but I believe the Purple Line bus rapid transit (BRT) is much superior to the light rail option.

Compared to light rail, BRT is better because:

C.1

(1)BRT is much less expensive. Light rail involves much greater construction costs, without bringing a better system.

(2)BRT is flexible. BRT can respond more easily and rapidly and cost effectively to changes in traffic patterns, ridership demands, equipment or facilities failure, traffic disruptions. Anyone utilizing Metro Rail knows the vulnerability of the system -- large portions or even the entire system can go down for extended periods due to small equipment failure or accidents. BRT can be re-routed around such problems.

(3)BRT produces less noise, both in terms of vehicle noise and traction power substations (in the case of light rail). The Department of Transportation at first denied any substantial noise from the operation of the light rail; now it admits to significant levels especially of train wheels around curves, train announcements, and from the power substations.

(4)BRT would disrupt neighborhoods less (with smaller stations or stops, no traction power substations, less degradation of quality of life from noise, etc.).

(5)BRT can be more responsive to ridership levels. The Dept. of Transportation has changed their estimates of ridership levels over the years to what some believe to be unrealistically high. With light rail, if ridership levels are consistently lower than these predictions, the taxpayers will be stuck with paying for underutilized fixed capital (stations, traction power substations, rolling stock, etc.) which came at a high price and which is not easily adaptable or which is not easily disposed of. With BRT, there would be less fixed capital costs to pay; and excess buses would likely be easier to sell at a greater percentage of the original cost than light rail trains would.

(6)BRT would require less taking of private property.

(7)BRT has proved itself in this area. Consider Metro's express buses from the Silver Spring Station to downtown via Georgia Avenue (and more recently down 16th Street). Both Georgia Ave and 16th St. are congested, yet the limited stop service has been successful and expanded a good deal since initiated. Note that these express buses are a VERY LIMITED version of bus rapid transit. The Purple Line BRT would be greatly superior to these express buses. To begin with, the Purple Line route is not as congested as Georgia Avenue or 16th Street; for this reason alone, BRT should be successful. But much more importantly, the Purple Line BRT plan involves substantial road improvements along its route (added turn lanes, road expansion, etc.). This should speed up BRT along the Purple Line substantially. Additionally, the Dept. of Transportation could choose to spend even more money on road improvements than the present BRT plan; this would improve traffic flow for both the BRT and the general traffic and still cost less than the proposed Purple Line light rail proposal (as well as having the other advantages of light rail listed above).

Jeanette Honsa
508 Bonifant Street
Silver Spring, MD 20910

Purple Line FEIS - RECORD #654 DETAIL

First Name : Tina

Last Name : Arreaza

Email Address : arreaza.tina@gmail.com

Submission Content/Notes : My family and use the trail regularly and it improves our quality of life and overall health. Please do not undermine our community by altering the trail in any way.

C.3

Purple Line FEIS - RECORD #655 DETAIL

First Name : Ajay
Last Name : Bhatt
Business/Agency/Association Name : Save The Trail
Email Address : ajay.bhatt@savethetrail.org
Submission Content/Notes : Please see our attached PDF "FCCT FEIS Comment Letter (2013) Final.pdf" response to the Final Environmental Impact Statement.

Thank you,

Ajay Bhatt

President

Friends of the Capital Crescent Trail

w: <<http://www.savethetrail.org/>> SaveTheTrail.org | f:
<<https://www.facebook.com/pages/Friends-of-the-Capital-Crescent-Trail/204693696213931>> facebook.com/Friends of The Capital Crescent Trail | t:
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Attachments : FCCT FEIS Comment Letter (2013) Final.pdf (825 kb)



Friends of the Capital Crescent Trail - PO Box 5803 - Bethesda, MD 20824

October 21, 2013

Via Electronic Submission (FEIS@purplelinemd.com)

Henry Kay
Maryland Transit Administration
Transit Development & Delivery
100 S. Charles Street
Tower Two, Suite 700
Baltimore, MD 21201

Daniel Koenig
Federal Transit Administration
1990 K Street, NW, Suite 510
Washington, DC 20006

Re: *Purple Line – Final Environmental Impact Statement and Draft Section 4(f) Evaluation*

Ladies and Gentlemen:

C.1

We appreciate the opportunity to respond to the request by the Maryland Transit Administration (“MTA”) and the Federal Transit Administration (“FTA”) for comments in connection with the above-referenced final environmental impact statement (“FEIS”). The FEIS describes and summarizes certain transportation and environmental impacts of building the Purple Line, a proposed east-west light rail transit service in Montgomery and Prince George’s Counties, Maryland. The purported purpose of the Purple Line is to: (1) provide faster, more direct, and more reliable east-west transit service connecting the major activity centers in the Purple Line corridor at Bethesda, Silver Spring, Takoma/Langley Park, College Park, and New Carrollton; (2) provide better connections to Metrorail services located in the corridor; and (3) improve connectivity to the communities in the corridor located between the Metrorail lines.

C.2

E.2

This comment letter is submitted on behalf of the Friends of the Capital Crescent Trail (“FCCT” or “we”) and other individuals and groups that support our cause.¹ The FCCT is a non-profit organization dedicated to preserving park land, open space and quality of life in Montgomery County, Maryland. We are *not* against mass transit and, in fact, fully support mass transit projects that are cost-effective, provide real benefits and do not irrevocably destroy park land uniquely situated in intensely developed residential and commercial areas. The Purple Line – in its *current* form – fails these three objectives, and we believe

E.5

¹ We have also submitted, in separate correspondence, the signatures of approximately 5,500 citizens that oppose the Purple Line in its current form.

E.7

the selection of the “preferred alternative”² has been an outcome-driven process without serious consideration of other, more cost effective forms of mass transit, including bus rapid transit (“BRT”) with traffic signal priority and dedicated and/or exclusive bus lanes.

E.8

We also believe that the FEIS fails to adequately assess, or fully and fairly discuss, the environmental and health impact of the Purple Line on the portion of the Capital Crescent Trail (“CCT”) between Bethesda and Lyttonsville, also known as the Georgetown Branch Trail (the “Georgetown Branch Trail” or the “Trail”), and the adjoining neighborhoods and their citizens. Nor has the FEIS adequately informed “decision-makers and the public of the reasonable alternatives which would avoid or minimize [these] adverse impacts or enhance the quality of the human environment.”³ For these and other reasons discussed in more detail below, the FEIS has failed to satisfy the legal requirements of the National Environmental Policy Act of 1969 (“NEPA”).

E.9

We strongly urge the MTA and FTA to reconsider the Purple Line in its current form. To that end, we request that the MTA issue a supplemental FEIS that corrects the deficiencies identified in this letter and provides a full and fair comparison of the attributes and deficiencies of the Preferred Alternative, No Build Alternative and Medium Investment BRT Option 1 (as defined below).

ABOUT THE TRAIL

E.11

The CCT is a linear park – a park utilized by over one million citizens each year, from Montgomery and Prince George’s Counties and other counties in surrounding areas.⁴ The CCT spans 11 miles, from Georgetown, DC to Silver Spring, MD. Montgomery County also identifies the CCT as a “special park” which is “heavily used at all times.”⁵ The Georgetown Branch Trail is a section of the CCT that runs for three miles between Bethesda and Lyttonsville. The Purple Line – in its *current* form – would *fundamentally* change the character of this magnificent park, and *irrevocably* destroy the mature forest and tree canopy that line a significant portion of the Georgetown Branch Trail.

E.12

The FEIS states that, as part of the Preferred Alternative, a permanent trail would be constructed within the Georgetown Branch Trail, along the Purple Line, and that the paved trail would “generally” be 12 feet wide with two-foot shoulders, “except that it may be narrower in locations where the width is constrained.”⁶ Of course, variations in topography along the Trail, as well as other physical impediments, would reduce the already limited space for a trail and guarantee that these measurements would not be maintained for the duration of the Trail. These changes would *fundamentally* affect the quantity or

E.14

² For purposes of this comment letter, the “Preferred Alternative” refers to the MTA’s current proposal (*i.e.*, the Purple Line in its current form).

³ 40 C.F.R. §1502.2.

⁴ See Capital Crescent Trail/Georgetown Branch Trail Survey Report, Maryland-National Capital Park & Planning Commission Department of Parks, May 2007, at 1 (“Over one million people use the popular Capital Crescent (CCT) and Georgetown Branch Trails each year.”) (the “2007 Survey”).

⁵ See MontgomeryParks.org, Trail Maps, Capital Crescent Trail, available at http://www.montgomeryparks.org/PPSD/ParkTrails/trails_MAPS/Crescent.shtm; see also MontgomeryParks.org, Park & Trail Directory, Capital Crescent Trail Special Park, available at http://www.montgomeryparks.org/parks_facilities_directory/capitalcrescenttrailsp.shtm.

⁶ FEIS, at p. 2-27.

quality of use of the Trail, depriving citizens of a nature sanctuary and an important buffer between commercial areas and adjoining residential neighborhoods. These changes could also introduce serious safety concerns for users of the Trail by, for example, forcing Trail users to cross Wisconsin Avenue – a busy six-lane road – to make the connection to the other portion of the Trail.

Before 1985, the CCT was a single-track freight line with a slow-moving train running once a day on the old Baltimore and Ohio Railroad right-of-way between Georgetown, Bethesda and Silver Spring. In 1988, Montgomery County purchased a portion of the right-of-way under the National Trails Systems Act, often called the “Rails-to-Trails Act.” Although this portion was purchased by the county for the purpose of providing both a trail *and* transitway, times, circumstances and priorities have changed. The seven-mile section of the CCT from Georgetown to Bethesda was built and formally dedicated in December 1996. Development of the Georgetown Branch Trail was approved by Montgomery County in August 1995 and dedicated in January 1997. In August 1998, the segment of trail passing through the tunnel underneath the Air Rights building, Wisconsin Avenue, and the Apex building entered into service to connect the two trail sections. In May 2003, repairs were completed to the historic Rock Creek Trestle and it was dedicated for trail use, closing the last major gap in the interim trail along the Georgetown Branch Rail Line Corridor.

The CCT, including the Georgetown Branch Trail, helps create and support the region’s culture of healthful living, outdoors enjoyment, and environmental awareness. These immeasurable benefits have already been bestowed on an entire generation and should remain for generations to come. The Trail should remain a first-class park encouraging recreation and respite from two thriving urban centers, Bethesda and Silver Spring, and afford citizens alternative forms of transportation by being able to run, walk or bike safely between these two locations.

ALTERNATIVES ANALYSIS

1. *Outcome-driven process without serious consideration of other, more cost effective forms of mass transit.*

We believe that the selection of the Preferred Alternative has been an outcome-driven process without serious consideration of other, more cost effective forms of mass transit, including BRT with traffic signal priority and dedicated and/or exclusive bus lanes. The regulations adopted by the Council on Environmental Quality (“CEQ”) implementing NEPA require that the alternatives discussion “rigorously explore and objectively evaluate all *reasonable* alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.”⁷ The regulations emphasize that the alternatives section “is the heart of the environmental impact statement,”⁸ and must “present the environmental impacts of the proposal and the alternatives *in comparative form*.”⁹ Moreover, the regulations adopted by the FTA and the Federal Highway Administration (“FHWA”) implementing NEPA also require that “the final EIS shall identify the preferred alternative and evaluate all *reasonable* alternatives considered.”¹⁰

In response to, and in anticipation of, the Alternatives Analysis and Draft Environmental Impact Statement (“AA/DEIS”), several commenters, including the Town of Chevy Chase, expressed concerns with respect to the alternatives considered and methodologies used by the MTA and FTA and recommended that the MTA and FTA consider other alternatives. One alternative – referred to in the FEIS as the “Medium Investment BRT Option 1” – would use BRT on Jones Bridge Road, between Bethesda and Jones Mill Road. According to the FEIS, the Medium Investment BRT Option 1, although providing a more direct service between Walter Reed National Military Medical Center (“WRNMMC”), would result in longer travel time and a loss of more than 2,000 daily riders.¹¹ The FEIS also claimed that the “travel market ... of downtown Bethesda is almost twice the size of the WRNMMC travel market.”¹² On this basis, the Medium Investment BRT Option 1 “was not carried forward” and was not sufficiently evaluated in the FEIS. However, we understand that a transportation engineer has raised serious concerns with respect to the methodology used by the MTA and FTA in the AA/DEIS, and requested the background data upon which they relied to support their conclusions.¹³ In addition, the AA/DEIS assessment was made *before* the full implementation of the Base Realignment and Closure (“BRAC”), and population and employment growth along the Jones Bridge Road alignment is expected to be higher

⁷ 40 C.F.R. §1502.14(a) (emphasis added).

⁸ 40 C.F.R. §1502.14.

⁹ *Id.* (emphasis added).

¹⁰ 23 C.F.R. §771.125(a)(1) (emphasis added).

¹¹ *See* FEIS, at p. 2-8; FEIS, Technical Report: Supporting Documentation on Alternatives (2013).

¹² *See* FEIS, at p. 2-8.

¹³ *See, e.g., Letter from Town of Chevy Chase to Diana Ratcliff, Director, Office of Planning, Maryland Transit Administration* (Jan. 13, 2009) (providing comments on the AA/DEIS); *Rebuttal to MTA’s White Paper Entitled “Medium Investment BRT Variations Serving Medical Center Purple Line AA/DEIS,”* Sam Schwartz Engineering (on file with authors); *Response to MTA’s White Paper entitled “Visitor Trips to the Walter Reed National Military Medical Center,”* Sam Schwartz Engineering (on file with authors).

than growth along the CCT alignment.¹⁴ Medium Investment BRT Option 1, a transit option that is less costly than the Purple Line and serves the travel needs of an area experiencing such tremendous growth, should have been given greater consideration by the MTA. All of these concerns and reasonable requests for additional information should have been addressed before circulation of the FEIS.

Without providing full and fair discussion of a reasonable alternative (*e.g.*, Medium Investment BRT Option 1), policymakers are denied the type of objective comparison that an environmental impact statement (“EIS”) must provide. This type of objective comparison is particularly critical considering: (1) the budgetary limitations of the federal government and the State of Maryland; and (2) that the cost of the Medium Investment BRT Option 1 is *substantially* less than the current estimated cost of the Purple Line, approximately \$2.2 billion.¹⁵ As most of our members are tax-paying citizens of the State of Maryland, we are also concerned that: (1) the cost of the Purple Line will continue to rise; and (2) the Purple Line will not generate sufficient revenue to cover annual operating expenses. Apparently, the FTA shares our concerns. According to the most recent “New Starts” project ratings, the Purple Line’s two lowest ratings – “medium-low” – relate to “Capital Cost Estimates, Assumptions and Financial Capacity” and “Operating Cost Estimates, Assumptions and Financial Capacity.” The FTA noted that: (1) “[r]evenue assumptions are optimistic when compared with historical data”; (2) “[t]he capital cost estimate is optimistic”; and (3) “[a]ssumed growth in operating expenses and farebox collections is optimistic when compared to historical experience.” The AA/DEIS and/or FEIS are further deficient in their failure to adequately assess potential revenue impacts with Medium Investment BRT Option 1 post-BRAC and the current expansion of WRNMMC and the National Institutes of Health (“NIH”), and the costs that could be avoided by implementing the Medium Investment BRT Option 1, including: (1) property acquisition costs; (2) tree removal and reforestation costs; (3) demolition of the Apex building; (4) construction of bridges over Connecticut Avenue and Rock Creek Park; and (5) the unnecessary risks to human health and safety by forcing Trail users to cross Wisconsin Avenue – a busy six-lane road – to make the connection to the other portion of the Trail.

2. *The FEIS fails to take the requisite “hard look” at the impact the Preferred Alternative will have on environmental resources.*

The FEIS fails to take the requisite “hard look”¹⁶ at the impact the Preferred Alternative will have on environmental resources because it fails to adequately consider other alternatives. The FEIS carried forward two alternatives from the AA/DEIS – the “Preferred Alternative” and the “No Build Alternative.” However, the FEIS omits detailed analysis or comparison of the No Build Alternative in the discussion of environmental resources, impacts and mitigation.

¹⁴ See Memorandum from Sam Schwartz, *Engineering to Town of Chevy Chase* (April 11, 2008) (citing Metropolitan Washington Council of Governments Round 7.1 Cooperative Forecasting: Employment, Population, and Household Forecasts by Traffic Analysis Zone (Jan. 9, 2008) (on file with authors).

¹⁵ See Maryland National Capital Purple Line Bethesda to New Carrollton, Maryland Project Development (Rating Assigned November 2012), available at http://www.fta.dot.gov/documents/MD_Maryl and_Purple_Line_Profile_FY14.pdf. We also note that the cost of the Purple Line has risen *significantly* since the selection of the Purple Line as the locally preferred alternative.

¹⁶ *Kleppe v. Sierra Club*, 427 U.S. 390, 410 n. 21 (1976).

The FEIS inadequately describes the No Build Alternative. For example, Chapter 2, which purports to discuss the alternatives considered, devotes less than one page to describing the No Build Alternative.¹⁷ Similarly, Chapter 4 provides only a cursory description of the impacts of the No Build Alternative in Section 4.1, “*Overview and Summary of Effects*.” The analysis of impacts in Chapter 4 lacks any discussion of the No Build Alternative, with the exception of Section 4.10 (comparing air quality effects of the Preferred Alternative to the No Build Alternative) and Section 4.17 (comparing energy use impacts of the Preferred Alternative to the No Build Alternative). This cannot satisfy the “detailed and rigorous consideration of alternatives” required by NEPA.¹⁸ The MTA apparently contends that such analysis is not required, because the FEIS instead states that “detailed assessment of the effects of the No Build Alternative projects will be the responsibility of each project sponsor at the time each project design is developed sufficiently to complete such an assessment.” Such an approach impairs the primary purposes of an EIS, which are to require an agency to consider the adverse environmental effects of a proposed project, and to ensure that the public has accurate information. Deferring responsibility for preparing a comparative analysis of the alternatives to some other entity to be performed at some later time fails to meet the “hard look” standard.¹⁹

What little discussion of the No Build Alternative does exist in the FEIS is fundamentally flawed. First, the FEIS states that the No Build Alternative has been updated since the publication of the AA/DEIS.²⁰ However, the FEIS fails to explain how the No Build Alternative has been updated, and it fails to explain what projects have been added or removed since the publication of the AA/DEIS. The documents included in the “*Technical Report: Supporting Documentation for Alternatives Development*” likewise do not detail how the No Build Alternative has been updated since the AA/DEIS. In particular, the “DEIS Re-Evaluation”²¹ prepared in 2012 purportedly evaluates the significance of new information or changed circumstances since the AA/DEIS was published in 2008. In fact, the DEIS Re-Evaluation only considers changes to the Preferred Alternative, and does not explain how the No Build Alternative has changed since the publication of the AA/DEIS.

The FEIS also claims that the No Build Alternative assumes all projects anticipated in the National Capital Region Transportation Planning Board’s (“TPB”) *Financially Constrained Long-Range Transportation Plan* (“CLRP”) (other than the Purple Line),²² yet elsewhere admits that unfunded

¹⁷ See FEIS, at pp. 2-18—2-20.

¹⁸ See, e.g., Rankin v. Coleman, 394 F. Supp. 6467 (E.D.N.C. 1975) (finding the alternatives analysis prepared in connection with an FHWA and North Carolina Department of Transportation project to be inadequate, because it was only 1-2 pages long and contained only conclusory statements).

¹⁹ See, e.g., Town of Matthews v. U.S. Dept. of Transportation, 527 F. Supp. 1055 (W.D.N.C. 1981) (finding that potential for a future development project cannot substitute for an analysis of its environmental effects in the EIS).

²⁰ See FEIS, at p. 2-18.

²¹ Under applicable law, if an acceptable final EIS is not submitted to the FTA within three years from the date of the circulation of the draft EIS, a written evaluation of the draft EIS must be prepared by the applicant, to determine whether a supplement to the draft EIS or a new draft EIS is needed. We understand that the MTA had prepared a re-evaluation of the AA/DEIS because of the passage of considerable time, which concluded that a supplemental EIS was not needed. We further understand that the FTA concurred with such findings. This finding is memorialized in, and is referred to herein as, the DEIS Re-Evaluation.

²² See FEIS, at p. 4-2.

“illustrative projects” included in the CLRP are excluded from the No Build Alternative.²³ Most significantly, the No Build Alternative does not include the proposed Montgomery County BRT network, which was approved by the Montgomery County Planning Board for transmittal to the County Council on July 11, 2013.²⁴ However, an FEIS’s no-action alternative must include a discussion of reasonably foreseeable development that would result from its adoption. In addition, CEQ has specified in guidance that where a choice of “no action” by the agency would result in predictable actions by others, this consequence of the “no action” alternative should be included in the analysis.²⁵ Despite this requirement, the FEIS does not consider at all whether the failure to construct the Purple Line would increase the likelihood that Montgomery County would adopt and fund the proposed BRT network, or the likelihood that the unfunded CLRP projects would proceed. This wrongly skews the comparison in favor of the Preferred Alternative.

Furthermore, the FEIS takes inconsistent approaches to including unfunded or unapproved projects, displaying another inappropriate bias in favor of the Preferred Alternative and a failure to provide a “full and fair” discussion of the alternatives.²⁶ The FEIS claims that the BRT network and “illustrative” CLRP projects should not be included in the No Build Alternative because they are unfunded or unapproved. On the other hand, the FEIS considers in the Preferred Alternative ancillary third-party development projects whose likelihood of beginning or continuing to completion are similarly uncertain.²⁷ The FEIS presents no discussion of the basis for including these planned developments in the analysis of the Preferred Alternative or the likelihood of construction or completion of these developments. Furthermore, the refusal to include the Montgomery County BRT network in the analysis of the No Build Alternative compromises the integrity of the data used to perform the comparison of air impacts and energy use in Sections 4.10 and 4.17 of the FEIS.

For these reasons, we request that the MTA issue a supplemental FEIS that corrects these deficiencies, by including:

- A full and fair evaluation of the Medium Investment BRT Option 1 that clearly discloses the methodology used to assess ridership and all other assumptions relied upon, and addresses the impact of BRAC and the substantial expansion of WRNMMC and NIH;
- A full and fair evaluation of the cost of the Purple Line and anticipated revenues from the Purple Line, addressing the concerns identified by FTA in the latest “New Starts” project ratings; and
- A full and fair evaluation of the No Build Alternative that clearly discloses the changes to the No Build scenario since the AA/DEIS was issued, applies the same assumptions regarding unfunded

²³ *Id.* at p. 2-18.

²⁴ See FEIS, at pp. 2-18—2-19, referencing the *Master Plan of Highways Bus Rapid Transit Amendment*, Montgomery County Planning Department, M-NCPPC (September 2011). The *Countywide Transit Corridors Functional Master Plan* (Planning Board Draft) (July 2013) was transmitted to the Montgomery County Council on July 11, 2013.

²⁵ See Council on Environmental Quality, “Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations,” Question 3, 46 Fed. Reg. 18026 (1981), available at <http://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>.

²⁶ See 40 C.F.R. §1502.1.

²⁷ See FEIS, at p. 4-19 (Table 4-2).

projects as used to tout the assumed benefits of the Preferred Alternative, and addresses the reasonably foreseeable impacts of the Montgomery County BRT network.

NOISE

1. *The FEIS fails to take the requisite “hard look” at noise impacts.*

The FEIS fails to take the requisite “hard look”²⁸ at the noise impacts caused by the Preferred Alternative. In its response to comments on the AA/DEIS, the MTA confirmed that the Trail is “an important community asset” and that the Preferred Alternative would “add more noise.”²⁹ However, the FEIS (including the Noise Technical Report) includes no discussion of the noise impact of the Preferred Alternative to Trail users. Moreover, the MTA’s noise assessment included no measurement of ambient noise or estimation of the project-related noise along the Trail. This is surprising since comments submitted in response to the AA/DEIS expressed concern about noise along the Trail and the FTA’s noise assessment methodology cautions that “outdoor areas which are considered to be particularly noise-sensitive by the community” should be included as receivers of interest in the assessment.³⁰ Remarkably, despite having or presenting no data regarding existing or expected noise along the Trail, the FEIS audaciously responds to citizen concerns about noise impacts by stating: “the Preferred Alternative does not exceed FTA’s noise criteria along the Georgetown Branch right-of-way.”³¹ Apart from this falsehood, if the FEIS does not present existing noise measurements along the Trail, estimate the noise impact from the Preferred Alternative on those using the Trail, and compare such impacts to the FTA’s noise criteria, then it cannot have taken a “hard look” at the noise impacts caused by the Preferred Alternative.

This deficiency, alone, suffices to confirm the failure of the FEIS to comply with applicable law. A court will – and should – overturn an agency’s decision as arbitrary and capricious under the “hard look” review if the agency “failed entirely to consider an important aspect of the problem.”³² Nevertheless, the FEIS’s noise assessment fails to take the requisite “hard look” in several other respects. The FTA’s noise assessment methodology requires categorization of noise receptors.³³ Category 1 receptors are those tracts of land “where quiet is an essential element in their intended purpose.”³⁴ FTA recognizes that parks in urban areas can be “valued as havens from the noise and rapid pace of everyday city life and should be treated as noise-sensitive.”³⁵ While the FEIS failed to evaluate the noise impact of the Preferred Alternative on the Trail – the closest park/urban “haven” to the Preferred Alternative – it did offer noise information for 13 “park” receptors.³⁶ However, it categorized each of these 13 parks as Category 3,

²⁸ *Kleppe v. Sierra Club*, 427 U.S. 390, 410 n. 21 (1976).

²⁹ *See* FEIS, at Appendix A, pp. 11, 14.

³⁰ Transit Noise and Vibration Impact Assessment (FTA 2006), p. 6-5.

³¹ *See* FEIS, at Appendix A, p. 14.

³² *Sierra Club v. U.S. Army Corps of Engineers*, 295 F.3d 1209, 1216 (11th Cir. 2002) (citing *Motor Vehicle Mfrs.*, 463 U.S. 29, 43 (1983)).

³³ *See* Transit Noise and Vibration Impact Assessment (FTA 2006), p. 3-7.

³⁴ *Id.* at p. 3-5.

³⁵ *Id.* at p. 3-8.

³⁶ *See* FEIS, Noise Technical Report, p. 18 (2013).

rather than Category 1.³⁷ Category 3 receptors are “institutional land uses with primarily daytime and evening use,” with FTA’s noise criteria set 5 decibels higher than for Category 1 and Category 2 (residential) receptors.³⁸ Category 3 receptors are considered “less sensitive to noise” than Category 1 and Category 2 receptors.³⁹ The FTA’s noise assessment methodology recognizes that parks “are a special case” where noise-sensitivity depends on how the park is used and requires that each park’s noise sensitivity should “be determined on a case-by-case basis after carefully considering how each [park] is used.”⁴⁰ However, the FEIS fails to provide any explanation for why the MTA chose to treat each of these 13 parks as Category 3 receptors subject to more-forgiving FTA noise criteria. In fact, it offers no information concerning how each of the 13 parks is used and offers no rebuttal to the hypothesis that some or all of the 13 parks function as noise-sensitive urban “havens” “where quiet is an essential element in their intended purpose” (*i.e.*, Category 1 receptors). This omission demonstrates MTA’s failure to take a “hard look” at noise impacts.

This failure is compounded by evidence of an apparent attempt by the MTA to bias the results of its noise assessment in favor of the Preferred Alternative. Specifically, the FEIS re-categorizes parks along the Preferred Alternative from Category 1 to Category 3, without acknowledging that such re-categorization had occurred or providing a shred of information supporting the re-categorization. The AA/DEIS identified the entire Purple Line study area corridor as characterized by Category 2 residential use and “Category 1 land uses where quiet is an essential element,” noting that Category 3 uses were “interspersed along the alignments” but were “not differentiated from the more-sensitive residential uses.”⁴¹ Moreover, the AA/DEIS identified all of the seven (7) park receptor sites where noise impacts were evaluated as Category 1 parks “where quiet is an essential element in their intended use.”⁴² The seven (7) parks listed in the AA/DEIS as Category 1 receptors are among the 13 park receptors treated as Category 3 by the FEIS, with no explanation. The failure of the FEIS to provide any mention, let alone any justification, for the re-categorization can only lead to the conclusion that the MTA sought to bias the results of its noise assessment by comparing noise impacts at these parks to the less-stringent Category 3 criteria.

In the AA/DEIS, the ambient noise measured at the seven (7) park receptor sites ranged from 51 to 63 Leq (1hr) (dBA).⁴³ In the FEIS, the ambient noise measured at locations within these same seven (7) parks ranged from 60 to 69 Leq (1hr) (dBA).⁴⁴ The FTA’s noise assessment methodology acknowledges that as “the existing level of ambient noise increases, the allowable level of transit noise increases.”⁴⁵ Thus, the increase in ambient noise measured at these parks results in an increase in the amount of noise the Preferred Alternative may generate without exceeding the FTA’s noise criteria. The FEIS offers no

³⁷ *Id.*

³⁸ Transit Noise and Vibration Impact Assessment (FTA 2006), p. 3-5.

³⁹ *Id.*

⁴⁰ *Id.* at p. 3-8.

⁴¹ See AA/DEIS, Noise and Vibration Technical Report, p. 2-4 (2008).

⁴² *Id.* at p. 2-5.

⁴³ *Id.*

⁴⁴ See FEIS, Noise Technical Report, p. 18 (2013).

⁴⁵ Transit Noise and Vibration Impact Assessment (FTA 2006), p. 3-6.

explanation for why the ambient noise levels reported in the FEIS differed so greatly from those reported in the AA/DEIS. The FEIS does not even mention the difference.

2. *The FEIS fails to demonstrate the adequacy and impartiality of the noise assessment.*

A reader of the FEIS can only speculate as to the reason for the significant change in measured ambient noise. It might be attributable to where in each park the ambient noise was measured. FTA requires that the “basis for selecting measurement sites should be documented,” that the “[m]easurement procedures should be fully described,” and that the “[m]easurement periods, including time of day and length of time at each site should be shown to demonstrate adequate representation of ambient conditions.”⁴⁶ The FEIS Noise Technical Report provides the date of measurement and the distance of the measurement point from the center line of the proposed light rail tracks, but fails to describe the basis for selecting each site, the measurement procedures used, the length of measurement time at each site or the time of day when noise was measured.⁴⁷

FTA requires that for “parks and other significant outdoor use,” the criteria should be applied at the property line.⁴⁸ It also requires that for an urban park the noise measurement site should be the “closest point of active noise-sensitive use.”⁴⁹ Despite these requirements, the FEIS Noise Technical Report reflects that ambient noise at the 13 park receptor sites was measured at locations between 30 and 285 feet from the centerline of the proposed light rail tracks. For the park receptors also addressed in the AA/DEIS, the FEIS noise measurement distance ranged from 52 to 238 feet from the centerline of the Preferred Alternative tracks. A brief look at a map will confirm that for certain parks running perpendicular to the Preferred Alternative alignment, the noise receptor chosen by MTA could not possibly have complied with FTA’s requirement that the receptor be located at the “closest point of active noise-sensitive use.” For example, Rock Creek Park crosses the path of the Preferred Alternative, yet the FEIS noise measurement in Rock Creek Park was collected 233 feet away from the centerline of the light rail tracks. As noted above, FTA requires that an FEIS noise assessment provide a “[j]ustification for all assumptions used in the analysis, such as selection of representative measurement sites and all baseline conditions.”⁵⁰ The FEIS provided no such justification. These FEIS deficiencies confirm that the MTA failed to take the requisite “hard look” at noise impacts from the Preferred Alternative.

3. *The FEIS ignores the FTA’s recommendation to discuss maximum noise levels.*

Pursuant to the FTA’s methodology, the FEIS compares the expected noise impact from the Preferred Alternative to the FTA’s criteria in terms of Leq and Ldn, both of which describe the total amount of noise over a specified period of time, rather than the loudest noise (*e.g.*, a train whistle) during that period. However, the FTA acknowledges that although “the maximum noise level (Lmax) is not used in this manual as the basis for the noise impact criteria for transit projects, it is a useful metric for providing a fuller understanding of the noise impact from some transit operations.”⁵¹ For this reason, the FTA

⁴⁶ *Id.* at p. 13-2.

⁴⁷ *See* FEIS, Noise Technical Report, Table 3 & Table 5 (2013).

⁴⁸ Transit Noise and Vibration Impact Assessment (FTA 2006), p. 3-10.

⁴⁹ *Id.*, Appendix. C, p. C-3.

⁵⁰ Transit Noise and Vibration Impact Assessment (FTA 2006), p. 13-1.

⁵¹ *Id.* at p. 3-9.

recommends that maximum noise information “be provided in environmental documents to supplement the noise impact assessment and to help satisfy the ‘full disclosure’ requirements of NEPA.”⁵² For rail projects, in particular, FTA considers it desirable to include the maximum noise impact (Lmax) “because the noise from an individual train passby is quite distinguishable from the existing background noise” and “people can relate this metric with other noise experienced in the environment.”⁵³ However, the FEIS fails to include any information about the expected maximum noise impact from the Preferred Alternative. The FTA reports that the noise from rail transit at grade (50 mph) would be approximately 80 dBA, which is louder than a food blender or an air compressor.⁵⁴ FTA also reports that the noise from a rail transit horn would be 90 dBA, which is louder than a jack hammer.⁵⁵ Despite FTA’s recommendation, the FEIS fails to mention the maximum expected noise that will be experienced due to the Preferred Alternative. As elsewhere, this demonstrates MTA’s failure to take the requisite “hard look” at noise impacts.⁵⁶

Not only does the FEIS ignore the FTA’s recommendation to consider and discuss the maximum noise impact (Lmax) of the Preferred Alternative, it appears to rely on inaccurate hourly equivalent noise levels (Leq). Specifically, the Noise Technical Report reflects that the Leq was calculated using the following assumed train frequency:

Total daily operations were determined based on 6-minute headways during peak periods of the day (6 AM to 9 AM and 3:30 PM to 6:30 PM), 10-minute headways during off-peak periods (9 AM to 3:30 PM and 6:30 PM to 9 PM), and 12-minute headways during the late night and early morning periods (9 PM to 1:00 AM and 5 AM to 6 AM). This service frequency was used to predict future noise levels under the Preferred Alternative.⁵⁷

The FEIS Glossary clarifies that the term “headway” refers to the time between transit vehicles operating in the same direction.⁵⁸ Thus, the train frequency relied upon in the FEIS noise assessment appears to be only one-way. If so, the Leq estimated by the FEIS would only account for half the number of trains during the relevant hour period. In addition, the FEIS failed to account for the combined noise when two trains pass each other in opposing directions. Thus, the FEIS “failed entirely to consider an important aspect of the problem”⁵⁹ as required by law.

⁵² *Id.*

⁵³ *Id.* at p. 6-29.

⁵⁴ *Id.* at p. 2-16.

⁵⁵ *Id.*

⁵⁶ The maximum noise presents a safety concern for Trail users since it could prevent Trail users from hearing bikers’ alerts (*e.g.*, bell ringing or “on your left”).

⁵⁷ *See* FEIS, Noise Technical Report, p. 15 (2013).

⁵⁸ *See* FEIS, Appendix E.

⁵⁹ *Sierra Club v. U.S. Army Corps of Engineers*, 295 F.3d 1209, 1216 (11th Cir. 2002) (citing *Motor Vehicle Mfrs.*, 463 U.S. 29, 43 (1983)).

4. *The FEIS fails to adequately assess mitigation of noise impacts.*

The FTA requires that the mitigation section of the Noise Technical Report “begin with a summary of all treatments considered, even if some are not carried to final consideration.”⁶⁰ The MTA’s FEIS Noise Technical Report fails to comply with this requirement. The long-term noise mitigation section of that report consists of only four sentences:

MTA’s analysis found that the further minimization and mitigation of operational noise at impacted sites is not reasonable. Much of the noise impact is derived from use of transit warning horns at stations and crossings, and eliminating the transit horn is not possible due to safety concerns. Another common noise-reduction measure – construction of noise walls – is not feasible for this project because these barriers would block driveway access and pedestrian walkways, as well as introducing visual impacts. Therefore, these additional measures are not proposed.⁶¹

The FEIS fails to discuss whether any of the following mitigation methods described by FTA were evaluated and, if rejected, the basis for such rejection:

1. Resilient or damped wheels (can reduce rolling noise by 2dB and wheel squeal by 10-20 dB);
2. Rail lubricators; and
3. Use of wayside horns for at-grade crossings.⁶²

The FEIS also fails to explain why the proposed four-foot high walls will not be placed between the tracks and the Trail or why the walls will only be four-feet high when higher walls could provide greater noise mitigation. In addition, FTA indicates that certain maintenance measures (*e.g.*, spin-slide control, wheel truing and rail grinding) are necessary to prevent the noise generated by a rail project from increasing up to 10 dB due to use, but the FEIS fails to indicate whether these maintenance measures will be employed for the Preferred Alternative.⁶³ If they are not employed, the actual noise from the LRT could be 10 dB louder than predicted by the FEIS.

As quoted above, the FEIS claims that transit warning horns cannot be eliminated due to safety concerns. However, the FEIS provides no basis or supporting evidence for that conclusion. In fact, FTA guidance discusses the use of “supplemental safety measures” (*e.g.*, gates) and “alternative safety measures” instead of sounding horns.⁶⁴ The FEIS fails to explain whether these measures were considered and, if rejected, the basis for that decision.

⁶⁰ Transit Noise and Vibration Impact Assessment (FTA 2006), p. 13-3.

⁶¹ FEIS, Noise Technical Report, p. 22 (2013).

⁶² Transit Noise and Vibration Impact Assessment (FTA 2006), p. 6-37

⁶³ *Id.* at p. 6-37.

⁶⁴ *Id.* at pp. 6-39 & 6-40.

For these reasons, we request that the MTA issue a supplemental FEIS that corrects these deficiencies, by including:

- A full and fair evaluation of the noise impact from the project on users of the Trail that recognizes the Category 1 noise-sensitivity of the Trail and includes the results of new ambient noise measurements along the Trail;
- A full and fair evaluation of the noise impact from the project on the other affected parks and recreational spaces that: (1) clearly discloses and supports with sufficient evidence the classification of such parks and recreational spaces as either Category 1 or Category 3; (2) provides a reasonable and supported explanation for the accuracy of the significant difference between the noise levels measured prior to the AA/DEIS and those levels measured after the AA/DEIS; and (3) clearly describes the bases for selecting each measurement site, the measurement procedures used, and the measurement periods (including time of day and length of time at each site);
- A full and fair evaluation of maximum noise levels (Lmax) expected at each receptor site (including along the Trail) from the project;
- A full and fair evaluation of the hourly equivalent noise levels (Leq) expected at each receptor site (including the Trail) that includes and accounts for passing trains in both directions;
- A commitment to employ Green Tracks along the Trail;
- A commitment to employ spin-slide control, wheel truing and rail grinding to prevent the actual noise from the project increasing by up to 10 dB above the Leq predicted by the FEIS;
- A commitment to move the proposed four-foot walls on the north side of the tracks to a location between the tracks and the Trail;
- A commitment to employ, or a reasoned and supported discussion of why there is no reasonable need to employ, the following additional mitigation measures:
 - Resilient or damped wheels;
 - Rail lubricators;
 - Use of wayside horns for at-grade crossings;
 - Supplemental safety measures and/or alternative safety measures in lieu of transit warning horns; and
 - Walls higher than four feet.

ENVIRONMENTAL JUSTICE

1. *The FEIS overstates the assumed benefits of and understates the expected adverse effects of the Preferred Alternative on the Trail.*

The FEIS reports that 69% of the Purple Line corridor is located in Environmental Justice areas.⁶⁵ It also acknowledges that the Environmental Justice populations within the study area would experience “some

⁶⁵ See FEIS, at p. 4-160. Pursuant to an executive order, the U.S. Department of Transportation and the FTA are required “to make environmental justice (EJ) part of [their] mission by identifying and addressing, as

adverse effects from implementation of the Preferred Alternative.”⁶⁶ However, the FEIS fails to take the requisite “hard look” at the adverse effects of the Preferred Alternative on the Environmental Justice population. Moreover, it fails to provide the required “full and fair discussion” of those adverse effects.⁶⁷ This deficiency is most glaring in the context of the Trail. The FEIS admits that portions of the Trail are located in Environmental Justice communities,⁶⁸ but then overstates the assumed benefits of and understates the expected adverse effects of the Preferred Alternative on the Trail.

The FEIS overstates the assumed benefits of “replacing the existing Georgetown Branch Interim Trail between Bethesda and Stewart Avenue” and “providing a permanent trail, separate from the roadways, from Stewart Avenue into downtown Silver Spring.”⁶⁹ The FEIS assumes that this will lead “to increased physical activity” providing an “opportunity to improve the overall health of the users of the Purple Line corridor.”⁷⁰ However, the FEIS fails to provide any evidence supporting this assumption. In particular, it fails to explain and defend the assumption that clear-cutting the existing canopy of trees along the Trail and locating a noisy train immediately adjacent to the Trail will result in an increase in Trail usage, particularly by Environmental Justice populations. As elsewhere in the FEIS, the discussion of Environmental Justice fails to mention the significant difference between: (1) a trail through a serene natural environment with a tree canopy; and (2) an unshaded trail buffeted by train noise many times per hour. It also fails to address the extent to which Environmental Justice populations rely on the Trail as an antidote to urban environmental stimuli. As noted above, the FTA recognizes that parks in urban areas can be “valued as havens from the noise and rapid pace of everyday city life.”⁷¹

The FEIS also overstates the assumed benefits of the Preferred Alternative and fails to provide the “full and fair discussion” required by applicable regulation,⁷² by relying exclusively on the assumption that the Trail will be extended *off-street* beyond Stewart Avenue. Although the FEIS acknowledges that such off-street extension will require the acquisition of property rights from CSXT,⁷³ the FEIS fails to evaluate whether the assumed benefits of the Preferred Alternative would outweigh the adverse effects if CSXT decided not to grant those rights. In such case, a portion of the Trail would consist of a bike route on streets. The Environmental Justice section of the FEIS discloses this fact in a footnote, but does not attempt to determine or evaluate whether use of the Trail by the Environmental Justice community would

appropriate, disproportionately high and adverse human health or environmental effects of [their] programs, policies, and activities on minority populations and/or low-income populations” See Environmental Justice Policy Guidance for Federal Transit Administration Recipients FTA Circular 4703.1, Federal Transit Administration (Aug. 15, 2012), *available at* www.fta.dot.gov/documents/FTA_EJ_Circular_7.14-12_FINAL.pdf.

⁶⁶ *Id.* at p. 4-155.

⁶⁷ 40 C.F.R. §1502.1.

⁶⁸ See FEIS, at p. 4-158.

⁶⁹ *Id.*

⁷⁰ *Id.* at p. 4-159.

⁷¹ Transit Noise and Vibration Impact Assessment (FTA 2006), at p. 3-8.

⁷² 40 C.F.R. §1502.1.

⁷³ See FEIS, at p. 4-158.

be affected by that difference. The “hard look” standard requires more than “researching in a cursory manner” and “sweeping negative evidence under the rug.”⁷⁴

In addition to overstating the assumed benefits, the FEIS understates the expected adverse impacts from the Preferred Alternative on the Environmental Justice population. For example, the FEIS declares that the Preferred Alternative “would not result in a major change in ... neighborhood quality.”⁷⁵ This unsupported declaration ignores the “quality” enhancement to the Environmental Justice population of having ready access to a peaceful, natural trail. In addition, the FEIS mischaracterizes the results of the visual impact assessment in an apparent attempt to bias the Environmental Justice assessment. The FEIS admits that: (1) portions of the Trail are located in Environmental Justice communities⁷⁶; (2) “much of the existing vegetation would be removed and most of the existing tree canopy would be eliminated”⁷⁷; and (3) this destruction of natural resources would result in a “high level of visual impact.”⁷⁸ The FEIS then contradicts the admission that portions of the Trail are located in Environmental Justice communities by concluding that the visual impact will not affect an Environmental Justice population.⁷⁹

The FEIS reports that the “extent of adverse impacts must ... be weighed against the benefits.”⁸⁰ The FEIS cannot be said to have complied with the regulatory obligation to provide a full and fair discussion of impacts if it tips the scales by overstating assumed benefits and understating expected adverse impacts. In addition, the FEIS fails to adequately explain why it concludes that the Preferred Alternative “would not have ‘disproportionately high and adverse effects’ on [Environmental Justice] populations.”⁸¹ Disproportionately high and adverse effects are those that are either: (1) predominantly borne by a minority population and/or a low-income population; or (2) suffered by the minority population and/or low-income population and are appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low income population.⁸² Of the 53 residential displacements that will be caused by the Preferred Alternative, 41 (77%) will be in Environmental Justice areas.⁸³ Of the 60 commercial business displacements resulting from the Preferred

⁷⁴ National Audubon Soc’y v. Dept. of the Navy, 422 F.3d 174, 194 (4th Cir. 2005).

⁷⁵ See FEIS, at p. 4-159.

⁷⁶ *Id.* at p. 4-158.

⁷⁷ *Id.* at pp. 4-84, 4-85.

⁷⁸ *Id.*

⁷⁹ *Id.* at p. 4-162. The Environmental Justice section of the FEIS states, in relevant part: “Section 4.9 identified 10 [visual assessment units (“VAUs”)] within the corridor, based on cohesiveness of land use and development patterns. ... Three of the VAUs were identified as experiencing high visual effects. Of these, two include EJ populations. ... *The only VAU with a uniform high effect was not in an EJ population.*” *Id.* (emphasis added). The one VAU with a uniform high effect identified in Section 4.9 is the area of the Trail. (“VAU 1 is comprised of moderately to heavily developed urban land along the Georgetown Branch right-of-way from downtown Bethesda ... to Stewart Avenue in Lyttonsville, the eastern terminus of the Georgetown Branch Interim Trail”) *Id.* at 4-79.

⁸⁰ See FEIS, at p. 4-155.

⁸¹ *Id.* at p. 4-169.

⁸² *Id.* at p. 4-167.

⁸³ *Id.* at p. 4-160.

Alternative, 35 (58%) will be in Environmental Justice areas.⁸⁴ Five of the six areas (83%) where the Preferred Alternative is expected to produce noise impacts will be in Environmental Justice areas.⁸⁵ However, the FEIS fails to explain to the Environmental Justice audience why these expected impacts are not deemed to be “predominantly borne” by them.

2. *The MTA declined to commission a Health Impact Statement to identify the health effects of the Preferred Alternative.*

While the FEIS offers unsupported and superficial conclusions regarding the beneficial health effects of the Preferred Alternative, it does not reflect that the MTA conducted any actual investigation of those assumed health effects. The MTA was asked to commission a Health Impact Assessment (“HIA”), as was completed for the Red Line in Baltimore, but the MTA declined to do so.⁸⁶ While an HIA is not required by NEPA, the Environmental Protection Agency acknowledges that the “steps in an HIA can identify health disparities, which are a prime indicator of the existence of a disproportionate impact to minority, tribal or low-income communities.”⁸⁷ Even without a HIA, the MTA could have conducted a statistically significant survey of Trail users to determine whether and how their use would change based on implementation of the Preferred Alternative. Such survey could have assessed the impact on trail usage of the following: (1) refusal by CSXT to provide the property rights necessary to permit the Trail to continue on the CSXT corridor; (2) elimination of the tree canopy, related loss of natural habitat and proximity to the expected train noise; and (3) elimination of direct backyard access to the Trail from certain properties. NEPA requires “that the agency both investigate and acknowledge the impacts” of its proposed action.⁸⁸

For these reasons, we request that the MTA issue a supplemental FEIS that corrects these deficiencies, by including:

- A full and fair evaluation of the assumed benefits and expected adverse impacts to the Environmental Justice community from the following proposed changes to the Trail that clearly discloses and accounts for any assumptions regarding Trail usage: (1) the impact of complete tree canopy loss; and (2) the noise impacts to Trail users;
- A full and fair evaluation of the impact on MTA’s assumption of health benefits deriving from an extended off-street Trail if CSXT will not grant the land rights necessary to extend the Trail off-street beyond Stewart Avenue; and
- A Health Impact Assessment.

⁸⁴ *Id.*

⁸⁵ *Id.* at p. 4-162.

⁸⁶ See Letter from Mary S. Rivkin, Ph.D., Education Department, University of Maryland, Baltimore County to Michael D. Madden, Purple Line Manager, MTA (Feb. 2, 2013) and undated response from Mr. Madden (available on file from FCCT).

⁸⁷ See Environmental Justice Considerations in the NEPA Process, Environmental Protection Agency, available at <http://www.epa.gov/oecaerth/nepa/nepaej/>.

⁸⁸ See *National Audubon Soc’y v. Dept. of the Navy*, 422 F.3d 174, 194 (4th Cir. 2005).

VISUAL RESOURCES AND MITIGATION

With respect to visual resources, the FEIS acknowledges that the Georgetown Branch right-of-way would undergo a high level of visual impact: much of the existing vegetation would be removed, the tree canopy would be eliminated and the overall appearance of the right-of-way would be substantially changed from present conditions.⁸⁹ The FEIS also considers the Trail to be in an area with a high degree of visual sensitivity due to mature trees and the prominence of the natural environment.⁹⁰ However the FEIS inexplicably does not provide an analysis of strategies to mitigate the visual impacts the Preferred Alternative will have on the Trail in the section of the FEIS that discusses visual impacts, where a member of the public interested in visual impacts to the Trail would likely look for such analysis. CEQ regulations require that agencies include appropriate mitigation measures not already included in the proposed action or alternatives. More significantly, FHWA/FTA regulations specify that it is the policy of the agencies that “[m]easures necessary to mitigate adverse impacts be incorporated into the action.”⁹¹ These regulations further require that the applicant be responsible, in cooperation with the agency, “to implement those mitigation measures stated as commitments in the environmental documents prepared pursuant to this regulation.”⁹²

The FEIS, however, merely states that MTA will work with local stakeholders to identify minimization strategies and mitigation for visual impacts.⁹³ The failure of the FEIS to consider and discuss in reasonable detail any mitigation measures is a defect that is found throughout the document; it is particularly notable with respect to visual impacts on the Trail because the FEIS has designated that area as one of both high sensitivity and high impact. To claim that the MTA will continue to work with local stakeholders is misleading because it obscures the fact that the MTA cannot replace the canopy since it would interfere with the light rail tracks under the Preferred Alternative alignment. Such a statement furthermore does not meet the standard for a “full and fair” discussion of mitigation measures – the FEIS should, at a minimum, provide a more detailed discussion of the reforestation plan, and discuss other avoidance and minimization measures that may be taken. In addition, future coordination would be inadequate since it would occur *after* the issuance of a Record of Decision, leaving affected parties no clear mechanism to obtain binding commitments. This deficiency is compounded by the proposed use of a public-private partnership to finance the project, since the private partner will strive to minimize its costs and maximize its return by limiting any mitigation or other accommodations not set forth in the Record of Decision.

The FEIS cannot satisfy the “hard look” standard without a reasonably complete discussion of possible mitigation measures. Omission of such discussion “would undermine the ‘action-forcing’ function of NEPA. Without such a discussion, neither the agency nor other interested groups and individuals can properly evaluate the severity of the adverse effects.”⁹⁴ Even where mitigation measures may be outside the jurisdiction of the lead or cooperating agencies, such measures must be discussed if they are

⁸⁹ See FEIS, at pp. 4-84, 4-85.

⁹⁰ *Id.* at p. 4-80.

⁹¹ 23 C.F.R. §771.06(d).

⁹² *Id.* at §771.09(b).

⁹³ See FEIS, at p. 4-90.

⁹⁴ *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 352 (1989).

reasonable, relevant and could improve the project. The probability that such measures will in fact be implemented must also be discussed.⁹⁵ While the MTA may prefer not to identify specific mitigation measures in order to avoid triggering additional responsibilities to actually implement such measures under the FHWA/FTA regulations, the failure to discuss such measures in a “full and fair” manner is a violation of NEPA standards.

For these reasons, we request that the MTA issue a supplemental FEIS that corrects these deficiencies, by including:

- A full and fair evaluation of potential mitigation strategies to address the visual impacts from the project; and
- A commitment to employ, or a reasoned and supported discussion of why there is no reasonable need to employ, specific, detailed mitigation strategies.

PARKS, RECREATIONAL LAND AND OPEN SPACE

1. *The FEIS fails to adequately discuss the impacts on parks, recreational land and open space.*

The discussion of impacts to parks, recreational land and open space is severely deficient because it fails to recognize that the Trail *functions* as a park, and thus lacks any meaningful evaluation and discussion of the impact of the Preferred Alternative on the use of the Trail as recreational land and open space. This omission is particularly remarkable because the MTA elsewhere admits recreational use of the Trail, and that the Trail is “an important community asset” used by pedestrians and bicyclists.⁹⁶ The MTA even points to so-called “improvements” to the Trail and connections between the Trail and other trails as positive impacts that would result from the Preferred Alternative with respect to parks, recreational land and open space.⁹⁷ In addition, other documentation produced by the MTA in connection with the FEIS explicitly refers to the Trail as a park.⁹⁸ The Purple Line runs parallel along a significant portion of the Trail,⁹⁹ and its construction has the potential to significantly impact the use of the Trail. The discussion of impacts to parks, recreational land and open space only briefly mentions the Trail, indicating that the MTA will coordinate with the National Capital Planning Commission (“NCPC”) regarding the proposed alignment of the Trail in Rock Creek Park.¹⁰⁰ The discussion also briefly mentions that widening of roadways along park boundaries “generally would require removing trees.” This is a tremendous

⁹⁵ See Council on Environmental Quality, “Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations,” Question 19a, 19b, 46 Fed. Reg. 18026 (1981), available at <http://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>.

⁹⁶ See FEIS, at Appendix A, at pp. 11, 12, 50.

⁹⁷ See FEIS, at p. 4-51; FEIS, at Appendix A, p. 38.

⁹⁸ See, e.g., FEIS, Technical Report: Supplemental Hazardous Materials, at p. 9 (2013) (referring to the Trail as a “public park”); FEIS, Technical Report: Social Effects and Land Use Planning, at p. 52 (2013) (“The Lyttonville station area also contains parkland associated with the Georgetown Branch Interim trail and Rock Creek Park.”).

⁹⁹ See FEIS, at Figures 1-2 and 2.11.

¹⁰⁰ See FEIS, at p. 4-51.

understatement with respect to the Trail, where construction of the Purple Line will require clear-cutting of the existing tree canopy.¹⁰¹

The FEIS is elsewhere inconsistent or conclusory in its evaluation of the impact the Preferred Alternative will have on park resources. In its analysis of sites eligible for the National Register of Historic Places (“NRHP”), the FEIS concludes that with respect to Rock Creek Park, “[w]hile the Preferred Alternative would introduce new visual elements (*i.e.*, the transitway including its overhead contact system, the Capital Crescent Trail, and the bridges carrying the transitway and the trail across Rock Creek), it would not diminish the park’s location, design, setting, materials, workmanship, feeling or association.”¹⁰² There is absolutely no basis set forth in the FEIS for this conclusion. On the contrary, other sections of the FEIS admit that the construction of the transitway and trail “would result in substantial changes in the viewshed of Rock Creek Park users and local residents. . . . The trail connection from the Capital Crescent Trail to the Rock Creek Trail would be a switchback path on the northeast side of the Preferred Alternative; while designed to minimize tree removal, it would nonetheless result in visual changes due to tree removal.”¹⁰³ The FEIS fails entirely to consider the impact the Preferred Alternative will have on the Trail as a recreational space. In addition, the conclusions in the FEIS with respect to the impacts that construction will have on other parks, such as Rock Creek Park, is simply not supported by evidence provided in the FEIS. Courts will overturn an agency decision as arbitrary and capricious under “hard look” review where “the agency failed entirely to consider an important aspect of the problem . . . [or] the agency offers an explanation which runs counter to the evidence.”¹⁰⁴

¹⁰¹ *Id.* at p. 4-85.

¹⁰² *Id.* at p. 4-71.

¹⁰³ *Id.* at p. 4-85.

¹⁰⁴ *Sierra Club v. U.S. Army Corps of Engineers*, 295 F. 3d 1209, 1216 (11th Cir. 2002) (citing *Motor Vehicle Mfrs.*, 463 U.S. 29, 43 (1983)).

2. *The FEIS fails to adequately consider the effects of compliance with regulations governing parks.*

The brief reference to coordination with the NCPC in Chapter 4 of the FEIS fails to adequately explain the regulatory context of such coordination, the required review and approval by NCPC and the impact such review may have on the Preferred Alternative. According to the FEIS, any proposed development within Rock Creek Park is subject to review by NCPC and review and approval by the Maryland-National Capital Park and Planning Commission (“M-NCPPC”). The FEIS concludes that the Purple Line is generally consistent with the NCPC’s *Comprehensive Plan for the National Capital: Federal Elements (2004)*,¹⁰⁵ but fails to discuss the basis for this determination, criteria for approval by NCPC or M-NCPPC, whether approval is likely to be granted, how long such review and coordination will take, whether NCPC or M-NCPPC may impose any conditions on development of the Preferred Alternative in Rock Creek Park, the environmental effects any such conditions may have, whether the Preferred Alternative alignment may need to be revised based on comments from NCPC or M-NCPPC, the environmental effects that may result from such revisions to the Preferred Alternative, and mitigation that may be undertaken to address any such effects. Here again, the MTA has failed to “consider an important aspect of the problem” in violation of NEPA.¹⁰⁶

For these reasons, we request that the MTA issue a supplemental FEIS that corrects these deficiencies, by including:

- A full and fair evaluation of the impact of the project on the use of the Trail as park or recreational land;
- A full and fair evaluation of the impact of the project on the other parks studied, including Rock Creek Park, that adequately supports any conclusion that the project will not diminish the positive attributes of such parks; and
- A full and fair evaluation of the review by NCPC and M-NCPPC and the need to obtain approval from NCPC and M-NCPPC for the alignment across Rock Creek Park, including the criteria for approval, the likelihood it will be granted, and conditions that could be imposed.”

HABITAT AND WILDLIFE

1. *The FEIS fails to provide a full and fair discussion of impacts to habitat and wildlife.*

The FEIS admits that the Trail is characterized by “the prominence of the natural environment.”¹⁰⁷ It also admits that as a result of the Preferred Alternative “much of the existing vegetation would be removed and most of the existing tree canopy would be eliminated.”¹⁰⁸ Despite these admissions, the FEIS argues that since “the Preferred Alternative would be largely constructed within existing roadway and

¹⁰⁵ See FEIS, at p. 4-51.

¹⁰⁶ *Sierra Club v. U.S. Army Corps of Engineers*, 295 F. 3d 1209, 1216 (11th Cir. 2002) (citing *Motor Vehicle Mfrs.*, 463 U.S. 29, 43 (1983)).

¹⁰⁷ See FEIS, at p. 4-80.

¹⁰⁸ *Id.* at p. 4-84.

transportation rights-of-way, potential effects on natural resources have been minimized.”¹⁰⁹ This is patently false. Since much of the Preferred Alternative alignment relies on the use of the Georgetown Branch right-of-way and the consequent *permanent* destruction of the existing vegetation and tree canopy, potential effects on natural resources have been increased. This patently false conclusion violates NEPA requirements by “sweeping negative evidence under the rug”¹¹⁰ and by failing to provide a “full and fair discussion” of the impacts.¹¹¹

Remarkably, while other parts of the FEIS mention the need to permanently remove the trees and other vegetation along the Trail, the section ostensibly devoted to a “full and fair discussion” of impacts to habitat and wildlife fails to do so. Instead, the FEIS relies on the following cryptic explanation of the long-term effects: “The impact of the Preferred Alternative on forest and specimen trees would primarily take the form of partial property acquisitions at the edges of forested habitat, affecting a total of 48 acres of forested habitat and 194 specimen trees.”¹¹² Nowhere in this long-term effects section does the FEIS clearly disclose that the tree canopy present along the Trail will be permanently removed.¹¹³ Moreover, the FEIS relies on the results of the *Forest Stand Delineation Report for the Purple Line Rapid Transit Connection* (2011), but fails to provide a copy of that document. That failure hinders the ability of the affected community to evaluate the accuracy and completeness of conclusions drawn in the FEIS and represents a failure of the FEIS to demonstrate evidentiary support for such conclusions.

The FEIS uses similar obfuscating language to address the issue of the Preferred Alternative’s impact on a colony of heron in the forested floodplain of Coquelin Run. The FEIS notes that the colony exists “in close proximity to the study area,” that such heronries “are a rare resource of particular interest that should be protected” and that disturbing such heronries through cutting nesting trees, cutting nearby trees or nearby construction that causes abandonment of chicks by the adults violates the Migratory Bird Treaty Act.¹¹⁴ However, the FEIS then uses selective language to minimize the reader’s perception of the potential adverse impact to the heronry. In a letter dated October 26, 2011, the Maryland Department of Natural Resources (“MDNR”) wrote that it would likely require a time-of-year restriction on work within ¼ mile of the heron colony.¹¹⁵ By letter to the MDNR dated February 27, 2012, the MTA admitted that the heron colony was within ¼ mile from the project site. Specifically, the MTA wrote:

¹⁰⁹ *Id.* at p. 4-175.

¹¹⁰ *National Audubon Soc’y v. Dept. of the Navy*, 422 F.3d 174, 194 (4th Cir. 2005).

¹¹¹ 40 C.F.R. §1502.1.

¹¹² *See* FEIS, at p. 4-117.

¹¹³ In addition, although NEPA requires a “full and fair discussion” of impacts, the FEIS fails to discuss or even mention the positive attributes afforded by the trees that the Preferred Alternative plans to permanently remove. As publicized by Montgomery County, trees: (1) remove pollutants from the air; (2) provide many ecological services that support reduced energy use and benefit the environment; (3) provide cooling through shade and evapotranspiration; (4) remove atmospheric CO₂ by sequestration; (5) benefit watersheds; (6) reduce stormwater runoff; (7) help soil stability; (8) help recharge groundwater supply; (9) lower crime rates; (10) help children concentrate; (11) increase the amount of time neighbors spend outside mingling with other neighbors; and (12) help reduce physiological stress. (See <http://www6.montgomerycountymd.gov/dectmpl.asp?url=/content/dep/climatechange/treeoverview.asp>)

¹¹⁴ *Id.* at p. 4-117.

¹¹⁵ *See* FEIS, Appendix G.

The project is located *within ¼ mile of the colony* but is buffered by the community that is located along Chevy Chase Lake Drive to the north, substantially diminishing the potential for direct impacts.¹¹⁶

However, in the FEIS the MTA wrote:

The project also would not result in long-term impacts to the heron colony located within Coquelin Run because *the colony is located outside the LOD approximately one-quarter mile from the proposed transitway alignment* and is buffered by an intervening roadway and residences.¹¹⁷

Unlike the candid correspondence with the MDNR, the FEIS fails to clearly acknowledge that the heron colony is located within the ¼ mile distance identified by MDNR as possibly leading to time of year restrictions on construction of the Preferred Alternative.

2. *The FEIS fails to support its assumptions and conclusions related to habitat and wildlife impacts.*

In connection with adverse impacts to habitat and wildlife, the FEIS fails to take the “hard look” required by NEPA, offering conclusions unsupported by any evidence. For example, the FEIS states that the aquatic species “expected to be impacted are acclimated to disturbed settings and would be likely to recolonize temporarily disturbed areas, though the communities are unlikely to be identical to those present prior to construction.”¹¹⁸ The FEIS does not identify what species would be impacted. It does not offer any support for the conclusion that such species are acclimated to disturbed settings. It does not offer any support for the conclusion that such species are likely to recolonize temporarily disturbed areas. It notes that almost one mile of stream habitat will be *permanently* destroyed, but confuses the issue by then discussing the mitigation afforded by potential recolonization of *temporarily* disturbed areas. The FEIS neglects to address potential mitigation of the permanent loss of aquatic habitat. Without an express evaluation of potential mitigation, “neither the agency nor other interested groups and individuals can properly evaluate the severity of the adverse effects.”¹¹⁹

Similarly, the FEIS fails to take a hard look at adverse impacts to terrestrial habitat and wildlife caused by the Preferred Alternative. The FEIS states that “[w]ildlife using terrestrial resources affected by the Preferred Alternative would be displaced (mobile species) or eliminated (non-mobile species) by the project.”¹²⁰ However, it does not offer any discussion of the extent and magnitude of the adverse impacts. It does not report that any effort was made to identify terrestrial wildlife populations in the study area. It does not estimate the severity of the impacts to those populations. It does not estimate how many terrestrial creatures will die or be displaced as a result of the Preferred Alternative. Moreover, as elsewhere, the FEIS turns a blind eye toward the natural habitat provided by the Trail. The FEIS

¹¹⁶ See FEIS, Appendix G (emphasis added).

¹¹⁷ See FEIS, at p. 4-118 (emphasis added).

¹¹⁸ See FEIS, at p. 4-118.

¹¹⁹ *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 352 (1989).

¹²⁰ See FEIS, at p. 4-117.

concludes that “[e]xisting wildlife corridors within the stream valley parks crossed by the transitway would be maintained.”¹²¹ However, the FEIS fails to acknowledge that the Trail is, itself, a wildlife corridor connecting the stream valley areas it transects. Accordingly, the FEIS fails “entirely to consider an important aspect of the problem” and violates NEPA requirements.¹²²

For these reasons, we request that the MTA issue a supplemental FEIS that corrects these deficiencies, by including:

- A full and fair evaluation of the impact of the project on the Trail that recognizes the significant natural environment provided by the Trail as well as the significant and permanent destruction of that natural environment;
- A copy of the *Forest Stand Delineation Report for the Purple Line Rapid Transit Connection* (2011);
- A full and fair evaluation of the impact of the project on the heronry located in Coquelin Run, including a discussion of the impact of time-of-year restrictions that could be imposed by MDNR; and
- A full and fair evaluation of the impact of the project on aquatic and terrestrial species that identifies the affected species, provides estimates of the number of organisms that will be lost, discusses available mitigation strategies, and commits to employ or provides a reasoned and supported discussion of why there is no reasonable need to employ, specific, detailed mitigation strategies.

LAND USE, PUBLIC POLICY AND ZONING

The FEIS concludes that the Preferred Alternative would be compatible with the existing mixed urban and suburban character of the study area land use. The FEIS states that “[t]he Preferred Alternative would be located on or along existing roadways, railroad rights-of-way, and the Georgetown Branch right-of-way,” and concludes that, “[t]herefore, it is not expected to substantially change the current land uses within the study area.”¹²³ There is no evidence to support the conclusion that current land use along the Trail would not be changed. In fact, the FEIS undertakes no analysis of whether restriction of access to the Trail to the proposed twenty-one paved access points, the destruction of tree canopy along the length of the Trail and construction of the Purple Line immediately adjacent to the Trail, would affect the quantity or quality of use of the Trail.

The FEIS lists the Planning Areas and most recent applicable policies and plans adopted by local, regional, state and federal authorities in Table 4-3.¹²⁴ The Georgetown Branch right-of-way is not included in the list, despite the fact that local plans for the Georgetown Branch have been established. In fact, MTA acknowledges in the response to comments to the AA/DEIS that “[t]he consideration of the Georgetown Branch right-of-way in this study took place against the backdrop of more than two decades

¹²¹ *Id.*

¹²² *See* *Sierra Club v. U.S. Army Corps of Engineers*, 295 F.3d 1209, 1216 (11th Cir. 2002) (citing *Motor Vehicle Mfrs.*, 463 U.S. 29, 43 (1983)).

¹²³ *See* FEIS, at p. 4-20.

¹²⁴ *Id.* at p. 4-21.

of planning by the County regarding the future use of that corridor” and that “[i]n January 1990, the Montgomery County Council approved the Georgetown Branch Master Plan Amendment, which officially designated the right-of-way for a combined transitway and trail.”¹²⁵ However, the FEIS misleadingly omits reference to the Georgetown Branch Master Plan Amendment in Table 4-3. Similarly, the Social Effects and Land Use Planning Technical Report cites the Master Plan Amendment in its list of references, but fails to include any discussion of the Master Plan Amendment.¹²⁶ These omissions loudly signal the failure of the MTA to “consider an important aspect of the problem” in violation of NEPA.¹²⁷

MTA repeatedly asserts in its response to comments on the AA/DEIS that the Trail was always intended to be used as both a trail and a transitway.¹²⁸ However, this oversimplification ignores the fact that the Georgetown Branch Master Plan Amendment explicitly recommended that there be no changes to the existing adopted land uses within 1,000 feet on either side of the Trail, and that “every effort possible be made to ensure that existing trees along the trolley/trail route are preserved wherever possible and that replacement of trees is of sufficient quantity and quality to preserve and enhance the environment.”¹²⁹ If the FEIS properly analyzed the Preferred Alternative in light of the Georgetown Branch Master Plan Amendment, it would: (1) evaluate whether the alignment selected is consistent with the Master Plan and discuss any inconsistencies; (2) analyze whether the displacement of existing commercial, residential and institutional uses caused by the Preferred Alternative¹³⁰ is consistent with the Georgetown Branch Master Plan Amendment; and (3) acknowledge that the Preferred Alternative, in contravention of the Master Plan Amendment, will require clear-cutting of trees along the Trail, and will not allow for replacement of trees in sufficient quantity and quality to preserve and enhance the environment, as required by the Master Plan Amendment. The FEIS provides no such analysis, and thus fails to provide a “full and fair” discussion of the impacts of the Preferred Alternative.¹³¹

For these reasons, we request that the MTA issue a supplemental FEIS that corrects these deficiencies, by including:

- A full and fair evaluation of how the project will change use of the Trail and the project’s inconsistency with the Georgetown Branch Master Plan Amendment.

AIR QUALITY

The discussion of the Preferred Alternative’s impacts on air quality in the FEIS is deficient in several respects. First, the FEIS relies on assumptions in concluding that the Preferred Alternative will have minimal impacts on air quality, without providing any evidence of a basis for these assumptions. For example, the FEIS concludes that Mobile Source Air Toxics (“MSATs”) emitted along the project

¹²⁵ See FEIS, at Appendix A, pp. 11, 14.

¹²⁶ See FEIS, Technical Report: Social Effects and Land Use Planning, at p. 74 (2013).

¹²⁷ *Sierra Club v. U.S. Army Corps of Engineers*, 295 F.3d 1209, 1216 (11th Cir. 2002) (citing *Motor Vehicle Mfrs.*, 463 U.S. 29, 43 (1983)).

¹²⁸ See, e.g., FEIS, at Appendix A, pp. 11, 20, 55.

¹²⁹ *Id.* at p. 1, 3.

¹³⁰ See FEIS, at p. 4-35 (Table 4.7).

¹³¹ 40 C.F.R. §1502.1.

corridor in the future would be proportional to the total Vehicle Miles Traveled (“VMT”) predicted under each alternative, assuming the vehicle mix does not change.¹³² The FEIS fails to consider whether the vehicle mix may, in fact, change, and particularly how the vehicle mix may be impacted by the various alternatives.

The FEIS further fails to account for the impact that new development resulting from the Preferred Alternative, including the Chevy Chase Lake development, will have on air quality. The FEIS touts the positive impact that the Preferred Alternative would have on economic growth and development in the area.¹³³ CEQ regulations require that an EIS consider both direct and indirect environmental effects of alternatives.¹³⁴ “Indirect effects” include those “which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable,” specifically “growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.”¹³⁵ While the FEIS takes into account the growth inducing effects of the Preferred Alternative when recounting the benefits of such effects, it fails to take into account these effects in projecting the impact the Preferred Alternative will have on air quality. NEPA requires an agency to consider the “incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions.”¹³⁶ By ignoring the impact such foreseeable development may have on air quality, the FEIS fails to provide a “full and fair” discussion of air quality impacts.

Additionally, the FEIS concludes that because the construction duration of the project is not anticipated to exceed five years in any single location, any impact incurred during construction would be considered a temporary impact, and therefore hot-spot analyses are not required. However, the FEIS fails to consider several factors that would recommend performing analysis of air impacts. First, the region is designated as non-attainment for PM_{2.5},¹³⁷ which would be a primary air quality concern during construction as a result of localized increase in the concentration of fugitive dust, as the FEIS admits.¹³⁸ Even temporary impacts may have a significant detrimental effect on air quality in a non-attainment zone. Second, the FEIS fails to consider that delays may cause the construction duration to exceed five years. According to the FEIS, the average time required for heavy construction activity alone is more than four years.¹³⁹ The total construction timeline for the Preferred Alternative is more than five years (July 2015 to late 2020).¹⁴⁰ The FEIS does not specify in its discussion of air quality whether those estimates account for delays that may be caused by the construction itself or by outside factors. In particular, as discussed more above, the MDNR has indicated that it would likely recommend a time-of-year restriction on work that falls within

¹³² See FEIS, at p. 4-97; FEIS, Technical Report: Air Quality, at p. 36 (2013).

¹³³ See FEIS, at 4-4.

¹³⁴ 40 C.F.R. §1502.16(a) and (b).

¹³⁵ 40 C.F.R. §1508.8(b).

¹³⁶ National Audubon Soc’y v. Dept. of the Navy, 422 F. 3d 174, 196 (4th Cir. 2005).

¹³⁷ See FEIS, at p. 4-96.

¹³⁸ *Id.* at p. 4-100.

¹³⁹ *Id.* at p. 5-2.

¹⁴⁰ *Id.* at p. 5-1.

¼ mile of a heron colony. Since it is reasonable to assume that MDNR will impose time-of-year restrictions on certain construction activities, it is also reasonable to assume that construction could exceed five years. Accordingly, hot-spot analyses for construction-related activities should be performed.

For these reasons, we request that the MTA issue a supplemental FEIS that corrects these deficiencies, by including:

- A full and fair evaluation of air quality impacts from the project, including consideration of vehicle mix changes, the effect of new development resulting from the project, and the likelihood that construction will take more than five years to complete.

WATER

With respect to water quality impacts, the FEIS presents at least partially contradictory conclusions. The FEIS acknowledges that “the project would increase impervious surfaces in the study area, which could increase the amount of surface runoff and potentially increase the level of contaminants such as heavy metals, salt, organic molecules and nutrients in the surface runoff.”¹⁴¹ However, it then concludes that “[s]ince the study area is already developed and the Preferred Alternative includes proposed infrastructure to effectively manage stormwater runoff generated by the project, increases in nutrient and sediment levels from the project are unlikely to affect overall TMDL management.”¹⁴² As elsewhere, the issue here is the failure of the FEIS to acknowledge the significant loss of natural habitat (*i.e.*, the study area is *not* already developed) or to provide evidentiary support for its conclusions. It does not attempt to estimate what the increase in stormwater runoff will be, what the nutrient and sediment levels in that additional runoff will be, or what impact those nutrient and sediment levels will have on the Chesapeake Bay Total Maximum Daily Load compliance.

For these reasons, we request that the MTA issue a supplemental FEIS that corrects these deficiencies, by including:

- A full and fair evaluation of water quality impacts from the project, including recognition that the project would significantly increase surface water runoff and contaminant loads to area waterways;
- A commitment to employ Green Tracks; and
- A commitment to employ, or a reasoned and supported discussion of why there is no reasonable need to employ, other specific detailed mitigation strategies.

* * * * *

The Purple Line – in its *current* form – would *fundamentally* change the character of the Capital Crescent Trail and *irrevocably* destroy the mature forest and tree canopy that line a significant portion of the Georgetown Branch Trail. We strongly urge the MTA and FTA to reconsider the Purple Line in its current form. To that end, we request that the MTA issue a supplemental FEIS that corrects the deficiencies identified in this letter and provides a full and fair comparison of the attributes and

¹⁴¹ See FEIS, at p. 4-127.

¹⁴² *Id.* at p. 4-128.

deficiencies of the Preferred Alternative, No Build Alternative and Medium Investment BRT Option 1. No matter what is suggested by artist renderings and MTA assurances, constructing and operating the Purple Line over the Trail will destroy permanently a unique, priceless, irreplaceable linear park between two bustling urban centers, forever depriving Silver Spring and residents east of Silver Spring of the many benefits derived from having this continuous park with its hiking, walking and biking trail.

Respectfully submitted,



Ajay Bhatt
President
Friends of the Capital Crescent Trail

cc: Roger Berliner, Councilmember, District 1, Montgomery County
Arthur Holmes, Jr., Director, Maryland Department of Transportation
Richard S. Madaleno, Jr., Maryland State Senator, Maryland's 18th District
Michael D. Madden, Purple Line Project, Maryland Transit Administration
Christopher Van Hollen, Jr., U.S. Representative, Maryland's 8th District

Purple Line FEIS - RECORD #656 DETAIL

First Name : JEFF

Last Name : ANNIS

Email Address : JEFFANNIS@REALTOR.COM

Submission Content/Notes : Put the train under ground where it belongs. The trail can not be replaced or moved. Damn the expense, start digging.

C.2

C.3

Purple Line FEIS - RECORD #657 DETAIL

First Name : Richard

Last Name : Furcolo

Email Address : RFurcolo@aol.com

Submission Content/Notes : Destroying the trail is asinine and any official who participates in this endeavor for should be removed from office.

C.3

Purple Line FEIS - RECORD #658 DETAIL

First Name : Thelma
Last Name : McDermott
Email Address : rothder@yahoo.com

Submission Content/Notes : To whom it may concern:

C.3

D.5

E.2

E.9

G.2

B.1

I live very close to the capital Crescent Trail, that is, within five minutes walking time, and I am contacting you today to very strongly express that destruction of this trail will impact very badly me, my family and my community in the areas of noise, health, safety, access to green space, and loss of bio diversity. Please do not destroy this beautiful invaluable environmental gem. Me and my husband and my children have been using the trail nearly every day for decades. Please do not cut down the trees to put a train system in. This community does not need a rail system. The metro is quite sufficient. In addition there will be tremendous construction noise and dislocation during the construction, and after the construction, when the trains are running there will be more noise and danger to area children and teenagers. Train areas tend to breed crime. There is no way, furthermore, to keep children and teenagers from attempting to enter onto the train tracks. This is a further danger. This is not to mention the HUGE expense. There are many other things more worthwhile to spend the money in. This project is a very bad idea. Sincerely Thelma McDermott and Professor Paul Rothstein. (Dictated to voice recognition system. Forgive typos, etc.)

Purple Line FEIS - RECORD #659 DETAIL

First Name : Timothy
Last Name : Seeley
Email Address : seeley@ieee.org
Submission Content/Notes : Trees not trains. Save the trail!

C.3

Purple Line FEIS - RECORD #662 DETAIL

First Name : Elisa
Last Name : Klein
Email Address : elisalklein53@gmail.com

Submission Content/Notes : Please don't do this to the Capital Crescent Trail - it runs very close to my house and is a place of refuge and exercise for thousands of people every day. The Purple Line will end up like the Inter-County Connector - underused, operating at a loss, and at a terrible price for our sense of community and the environment.

C.3

Purple Line FEIS - RECORD #663 DETAIL

Last Name : melissa

Email Address : mandkindle@gmail.com

Submission Content/Notes : I knew the trail before it was built when I lived in Palisades DC and it was a wonderful coming together of the community when we held the ribbon cutting. DO NOT destroy the wonderful, peaceful and special environment that was built and would forever be very negatively impacted thank you

C.3

Purple Line FEIS - RECORD #664 DETAIL

Last Name : Harvey
Email Address : mdcr@yahoo.com

Submission Content/Notes : As a resident of the Seven Oaks-Evanswood neighborhood whose home is just a few blocks from the proposed Wayne Avenue Power Substation site, I am requesting that MTA keep open the issue of what to do about the power substation on Wayne Avenue until the matter can be resolved in a manner satisfactory to residents of the neighborhood.

C.4

>>
>>
>> Thank you for your consideration in this important matter.
>>
>>
>>Harvey Walden
>>Pershing Drive, Silver Spring
>>
>>
>>

Purple Line FEIS - RECORD #665 DETAIL

First Name : Aileen
Last Name : Worthington
Email Address : aworthington@verizon.net

Submission Content/Notes : As a District of Columbia resident, it is incomprehensible to me that a heavily used linear park/trail in lower Montgomery County is to be willfully destroyed. The existing trail, shaded by acres of mature trees, is enjoyed by residents and visitors of all ages. It is an integral part of our area's amazing interconnected system of trails. I am an advocate and user of public transit but surely there is an alternate Purple Line route. We should treasure, not decimate, precious green space in an increasingly developed area. I am also concerned about possible detrimental effects of the Purple Line construction and hundreds of trains daily on Rock Creek Park.

C.3

E.5

Purple Line FEIS - RECORD #666 DETAIL

First Name : Robert
Last Name : Elliot
Business/Agency/Association Name : Washington Real Estate Investment Trust
Email Address : mail@sf-notifications.com
Submission Content/Notes : WRIT FTP has sent you files.

*** Click here to download 13 1021_WRIT comments re Purple Line FEIS with exhibits.pdf <https://writ.sharefile.com/d/d32e48b6a04b4cd3>

Note From WRIT:

F.7

Please find a link to Washington Real Estate Investment Trust's comments regarding the Purple Line FEIS. We have also sent this letter via FedEx and have attempted to send via direct e-mail.

ShareFile is a tool for sending, receiving, and organizing your business files online. It can be used as a password-protected area for sharing information with clients and partners, and it's an easy way to send files that are too large to e-mail.

Powered By Citrix ShareFile 2013

Attachments : 13 1021_WRIT comments re Purple Line FEIS with exhibits[1].pdf (18 mb)



6110 Executive Boulevard, Suite 800 main 301 984 9400
Rockville, Maryland 20852 fax 301 984 9610

October 21, 2013

Purple Line: FEIS Comment
Maryland Transit Administration
Transit Development & Delivery
100 S. Charles St
Tower Two, Suite 700
Baltimore MD 21201

To Whom It May Concern:

Washington Real Estate Investment Trust (WRIT) is the long-term owner of a 5.45 acre parcel of land that sits adjacent to the proposed Long Branch Purple Line Station. The property is presently improved with just over 50,000 SF of retail, including a Giant grocery store, Chevy Chase Bank, and the Montgomery Beauty School. Having owned the property since 1963, WRIT is invested in the community and its future success.

WRIT has reviewed the Final Environmental Impact Statement (FEIS) and has identified two main areas of improvement to the Arliss Street portion of the Purple Line – construction staging and long-term property access. While we are supportive of the Purple Line and look forward to its arrival, we believe that some minor changes to the plans are required in order to ensure the success of the Purple Line in Long Branch.

We should note that we are making these recommendations without the benefit of all of the drawings referenced in the Index of Drawings in Volume II of the FEIS. WRIT requested copies of the drawings relevant to our property from the Purple Line Project Manager on September 23, 2013, but thus far have not received any of the requested items. Some of these drawings, such as the maintenance of traffic plans and signalization plans, could have meaningful short and long-term implications for our property as well as the surrounding community, and as such, should have been included as part of the 30-day public review. While we recognize that the FEIS is a work in progress, we would note that the drawings included in the FEIS along Arliss Street lack consistency. For example, the Arliss Street alignment plans, Contract T-1042-0220, Drawing Sheets CV-30 and CV-31, represent our current understanding of the Purple Line plans with the train “side running” along the western side of Arliss Street. However, the corresponding cross sections, Contract T-1042-0220, Drawing Sheets TS-036 through TS-038, which are still dated 2012, show the train running through the median. For an adjacent property owner, a portion of whose land would be condemned as part of these plans, this inconsistency is significant; based on the provided sections, we have no reference for important design considerations such as retaining wall heights along Arliss Street, the cross section and design of the proposed Arliss Street station, or exactly how and where the train emerges from the tunnel portal. WRIT recommends that our comment period be extended until such time we have had the opportunity to review complete and coordinated drawings. At

this time, our comments respond to the FEIS document and drawings previously supplied by MTA. We reserve the right to further comment once all the referenced drawings are made available for our review.

Construction Staging

A. Parking

Sheet 12 of the Environmental Resource Map indicates that a substantial portion of WRIT's parking lot would be disturbed by the Purple Line. Without access to the requested maintenance of traffic plans referenced in the FEIS, we must reasonably infer that the limit of disturbance line shown on our parking lot reflects the extent of the construction staging area; this line is consistent with the staging diagram and the maintenance of traffic plans the Maryland Transit Administration (MTA) provided to WRIT this past spring (Exhibit A). The Plymouth Tunnel staging area/Stage 1 – which would remain in place for at least 30 months, with construction occurring 24 hours a day, 6 days a week (in order to maintain that schedule) – would have significant, detrimental impacts on the number of parking spaces available to our tenant, Giant, and on the turning movements of Giant's delivery trailers. We will further explain these impacts and then offer a number of alternative staging areas that would bare a lesser burden to both WRIT, WRIT's tenants, and the state of Maryland.

WRIT is contractually obligated to maintain the parking lot in its present configuration, which currently provides 372 parking spaces. Knowing that the construction of the Purple Line would impair a significant portion of the parking lot, we hired a respected traffic consultant, Kimley-Horn and Associates, Inc., to analyze the parking impacts to our property. Based on that analysis, it is estimated that the Stage 1 staging area would eliminate 182 parking spaces (49%) from use during this 3-year period of construction (that number includes additional spaces lost to allow for trailer turning movements).

The loss of parking spaces could prompt Giant to seek to terminate its lease and thereby significantly increase the valuation and community impacts of the taking of WRIT's property. Notwithstanding this potential outcome, Giant has informally indicated to us that it currently plans to continue to operate its store at this location provided that at least 200 spaces remain available *in front* of the store entrance. As you can see from the attached traffic diagrams (Exhibit B), only 129 spaces remain in front of the store during Stage 1 of construction. We note that the remaining phases of construction allow for adequate parking, but mitigation measures must be pursued to accommodate at least 71 additional spaces in Stage 1.

B. Truck Turning Movements

Each phase of construction poses unique challenges to Giant's delivery trailers, which measure up to 70 feet in length. Giant receives up to 4 deliveries per day, between the hours of 4AM and noon, and strongly prefers at least 2 options for ingress and egress. Today, trailers access the site via the northern entrance, which provides a short travel distance and easy access to the western loading bays. The tunnel staging area would eliminate entry from this access point, diverting trucks to the southern entrances. During Stage 1 construction, trucks would be required to enter from the southernmost entrance, circumnavigate the parking lot (Giant's safety standards do not allow trailers to cross in front of stores) and then access the

western loading bays – use of the eastern loading bays is not feasible as the turning movements of the trailers would block the only means of access to the front parking lot.

While the trucks could physically manage this atypical entry sequence, exiting the property would pose a greater challenge. On the Stage 1 turning movements diagram of Exhibit B, you can see that the truck path would impact an existing light pole on the northern end of the parking lot. In order to avoid this obstacle, a truck would need to use the drive aisle in front of the store, which as mentioned above, is prohibited by Giant's safety standards. A better, and in our mind, easier solution to this problem would be to adjust the southern edge of the staging area to allow trailers enough room to navigate this turn. As an alternate to adjusting the staging area, we have also illustrated how trucks could access our property through the gas station property that MTA intends to condemn. Please note that Giant would strongly prefer to have at least two separate means of ingress and egress.

During later phases of construction, trucks are able to access the loading bay via the newly-created northern entrance, however they may find exiting at that location challenging due to the proposed curb island. We would ask that MTA clarify the functionality of the northern entrance during construction versus the final condition. While the staging diagrams show multiple movements exiting the property at this location, the final condition permits right-hand turns only. We have provided turning movements for both scenarios. During Stage 4, tractor-trailers would be unable to avoid obstacles when exiting the property; leaving via the northern entrance impacts the curb island, and leaving via the southern entrance is not possible without utilizing a portion of the proposed staging area. Further, the narrow drive aisle does not permit two-way traffic. We have shown the exiting condition through the gas station site as a secondary option if the impact to the staging area at the southern entrance is not possible.

C. Minimizing Impacts

Both the parking issue and the tractor-trailer movement issue could be resolved by reducing the amount of space required for staging on WRIT's property. There are a number of alternative staging locations that we believe would be acceptable to MTA:

1. The parking lot at the southeastern quadrant of the intersection of Arliss Street and Flower Avenue (tax account # 03544464) – MTA is currently proposing to use half of this parking lot for staging purposes. We would suggest using the entire vacant parking lot and reducing the use of WRIT's property by a proportional area. In Table 4-1 of the FEIS, MTA states that it "will use vacant or publicly-owned property, rather than privately-owned, developed property, for temporary construction activities to the extent reasonably feasible." Whereas that parking lot sits vacant (and would for the foreseeable future given that the remaining half would be encumbered by staging), WRIT's parking lot is part of a developed property and required by Giant for use by its customers.
2. The Long Branch Public Library parking lot (tax account # 00980721) – this lot is public property and sits within close proximity of the staging area. The mitigation and minimization strategies outlined in the FEIS, and quoted above, should be followed. This site would be ideal for less active uses such as construction worker parking or materials storage.

3. The gas station site at the northwestern quadrant of the intersection of Arliss Street and Piney Branch Road (tax account # 00960710) – this property is slated for full property acquisition. In many other areas of the FEIS, MTA proposes staging areas on properties that would be acquired for the project. We would suggest acquiring this property sooner rather than later so that MTA may gain efficiencies by also using it as a Stage 1 staging area, rather than additionally paying WRIT for a construction easement.

For the avoidance of doubt, the potential economic impacts – to the community, to WRIT and to the state of Maryland – from the construction process are extensively exacerbated if Giant ceases its operation at the location. As a result, we would strongly urge MTA to carefully consider the parking lot and truck movement considerations raised by this letter. We have said before on numerous occasions – and feel compelled to state it once more – that **all parties will be significantly and adversely impacted if Giant ceases operation at our site.**

Long-Term Property Access

For the last 50 years, WRIT has enjoyed full movement – left and right-hand turns – onto and off of our property at three locations. As a retail center, this level of accessibility, and the perception of accessibility, is essential to the success of our tenants. The FEIS plans do not provide a full movement entrance at WRIT’s property, however, as noted, coordination between MTA and WRIT on this issue is still ongoing.

As part of that coordination effort, WRIT met with MTA this past June to discuss the feasibility of a full-movement, signalized intersection just north of the Long Branch station platform. Provided that the intersection would meet traffic signal warrants and that there would be room to add a dedicated left-hand turn lane, both MTA and WRIT agreed that a signal should be installed. Additionally, the Montgomery County Council recently approved a recommendation for a signalized, full-movement intersection at this location in the Long Branch Sector Plan. This modification to the Arliss Street plans would accomplish several objectives:

1. This intersection would provide WRIT close to the same level of access that it has enjoyed since 1963. As elsewhere provided in the FEIS, MTA should mitigate the impacts to the extent possible, which includes maintaining the same level of access that properties currently enjoy.
2. The signal would vastly improve pedestrian safety at this station. The FEIS notes that the proportion of Long Branch’s residents using public transportation is 28%, which is greater than both the Purple Line Study area (23%) and Montgomery County (15%) figures (Social Effects and Land Use Planning Technical Report, pg. 9). This statistic suggests that there is a high likelihood of a person accessing the Long Branch station by foot. The current designs for Arliss Street show direct station access at only one end of the platform (the signalized intersection at Piney Branch Road). The only way to safely cross to the northern end of the platform is via the library signal, almost 350 feet to the north. A signalized crossing just north of the Arliss Street Station platform (adjacent to several hundred existing units of apartments) would reduce the likelihood of unprotected, midblock crossings and in effect “hold” the trains so that pedestrians may cross.
3. A signalized intersection would vastly improve vehicular safety at the Long Branch Station. In order to further our coordination efforts with MTA, WRIT commissioned a signal warrant

analysis from Kimley-Horn in order to determine whether this intersection would meet the Montgomery County Department of Transportation's signal requirements. Based on the existence of the train crossing alone, Kimley-Horn finds that the intersection just north of the station platform satisfies the standards for Warrant 9 (Exhibit C). Without a signal, it is highly unlikely that a driver would be able to turn off of the property safely given the span and visibility of the crossing. There is also the risk that a driver would straddle the tracks while waiting to make a turn onto Arliss Street. The FEIS states that, "MTA's conceptual plans for the Purple Line include roadway and intersection improvements consistent with applicable design standards for safety, enabling the Purple Line and other transportation modes to operate together as efficiently and safely as possible" (ES-4). Given that signalization would allow this intersection to meet basic safety standards, its design should be included in future Purple Line plans.

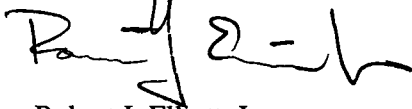
4. Creating greater accessibility to WRIT's property would further the redevelopment goals of the Long Branch Sector Plan. The FEIS notes that, "By 2040, employment growth is expected to occur in all study area neighborhoods except Long Branch" (4-41). Additionally, the Long Branch station has the lowest projected ridership of all of the proposed Purple Line stations (ES-5). The Long Branch Sector Plan seeks to change this trajectory by providing redevelopment incentives to the commercial properties within the Town Center. As MTA is aware, WRIT has explored several redevelopment options and would like to pursue densifying its property in the future. But without adequate access – access that WRIT has enjoyed since owning the property – the viability of any redevelopment becomes less certain. With over 1,000 feet of linear frontage, WRIT's property must have a full-movement, signalized intersection if it is going to attract the retail tenants and residents that will make redevelopment a reality. Other properties within the Town Center would also benefit from this intersection as many of them would connect to the proposed mid-block street whose eastern terminus is at this intersection. Commercial and residential growth at the Town Center will only bolster the ridership and success of the Long Branch station.

The adoption of a full-movement, signalized intersection just north of the Long Branch station ultimately rests on two components: meeting the warrants for a signal and also providing space for a dedicated left-hand turn lane. The results of Kimley-Horn's warrant study acknowledge the necessity for a signal at this intersection. The addition of the left-hand turn lane may be accommodated by switching the Long Branch station from a center platform to side platform format. As discussed during our meeting with MTA in June, enough space has been provided in the train right-of-way to allow for a train gate between the eastern tracks and the vehicular travel lanes. By opting for a side platform configuration, the space required for the gate could be provided in the same area as the eastern platform. This efficiency could create enough space for an additional vehicular travel lane within the overall right-of-way. In the event that additional space is still needed, WRIT would consider providing additional right-of-way on its property should no other viable alternative exist.

WRIT has worked diligently with MTA and Montgomery County for over a year in order to create a design that would best meet the needs of all parties and the greater Long Branch community. We believe that our recommendations regarding construction staging and long-term access will enhance the overall configuration of the Arliss Street alignment and also provide much needed mitigation for the short and long-term effects of the Purple Line. It is our hope that MTA will adopt these mitigation strategies rather than increase the financial burden on the state of Maryland.

If there are any questions, I can be reached directly at 301-255-0765 or belliott@writ.com. Thank you for your consideration, and we look forward to continuing to work with MTA on this exciting and transformative project.

Sincerely,



Robert J. Elliott, Jr.
Director of Development

Cc: Mr. Michael Madden, Project Manager, Purple Line
Mr. Rubin Bard, Director of Real Estate, Giant
The Honorable Jamin B. Raskin, Senator, District 20
The Honorable Sheila E. Hixson, Delegate, District 20
The Honorable Thomas Hucker, Delegate, District 20
The Honorable Heather R. Mizeur, Delegate, District 20
The Honorable Valerie Ervin, Councilmember, Montgomery County Council
The Honorable François Carrier, Chair, Montgomery County Planning Board
Ms. Melissa Williams, Senior Planner, M-NCPPC Montgomery County
Mr. Val Lazdins, Chief, Area 1, M-NCPPC Montgomery County
Mr. John Marcolin, Planner Coordinator, M-NCPPC Montgomery County
Mr. Tom Autrey, Supervisor, Functional Planning and Policy, M-NCPPC
Mr. David Anspacher, Planner/Coordinator, Functional Planning and Policy, M-NCPPC
Mr. Paul T. McDermott, President & CEO, WRIT
Mr. Thomas C. Morey, Senior VP and General Counsel, WRIT
Mr. Paul S. Weinschenk, VP and Managing Director of Retail, WRIT
Mr. Patrick L. O'Neil, Counsel, Lerch, Early & Brewer, Chtd.

Purple Line FEIS - RECORD #668 DETAIL

First Name : Neil C.
Last Name : Davis
Email Address : neilcdavis@verizon.net

Submission Content/Notes : Comments by Neil C. Davis, CIH on The Purple Line Final Environmental Impact Statement, 2013

My comments will be limited primarily to the noise and vibration issues surrounding this project. I have reviewed chapters 2, 4 and parts of chapter 5 as well as the noise and vibration technical appendices. I live at #1 Kentbury Way, Bethesda, MD, 20814 which is at the corner of Kentbury Drive and Kentbury Way. I estimate my wife and my residence is less than 150 feet to the centerline of the proposed light rail train (LRT) centerline. There is one row of housing between our home and the proposed LRT path. Our noise exposures will be most similar to sample M-10, 8003 Kentbury Drive, but our exposures will be less intense.

E.9

I also am a Certified Industrial Hygienist (CIH), an occupational and environmental specialist in identifying, measuring and controlling primarily occupational exposures to chemicals, noise and other physical hazards. I have been a member of the AIHA Noise Committee over 10 years and CIH for 35 years. I consider myself an expert in occupational noise control and hearing conservation and noise, ergonomic and chemical exposures evaluation and control in the construction industry.

G.2

The noise exposures from the purple line projects described in the Noise Technical Report, August 2013 can be described as Long Term (40-50 years) LRT Operations and short term construction (2015-2020, 5 years) intermittent construction noise "General Assessment " guidelines Transit Noise and Vibration Impact Assessment (FTA May, 2006). In most cases, residential noise exposures were below the FTA criteria for moderate or severe impact of residential and institutional land use. Moderate noise impact was projected occur at 11 residential (7 which are single family homes and 4 which are apartments containing approximately 140 units. The Noise Technical Report indicates that in most sensitive residential areas wheel skirts and 4 foot barrier walls provide a combined 12 dBA sound reduction and that the residual elevated noise exposures were due to horn and bell warnings and potential "Wheel Squeal" in tight turn areas.

Comments on Long Term Report Assumptions and Omissions

. Long term report should have a discussion on the necessity and

components of an ongoing operations and maintenance program to maintain track and trains to ensure overall safety of the operations and continued noise control. In the occupational setting poor maintenance or the absence of maintenance procedures are associated with increased occupational noise levels. (References)I have limited experience in railway noise control, but the extremes of weather and related effects(hot, cold, rain and soil erosion, snow and salt and other chemical treatments, must have a cumulative corrosive and deforming effect on track and train wheels. The moving parts of an electronic train need regular maintenance of axels, pulleys, transmission systems, wheels, and whistles.

. Sensitivity of the projected noise model (FTA May, 2006) to different variables needs to be more transparent. The FTA May, 2006 projected noise impact model has multiple variables. The type of land use, warning device used at or near location, distance from center line of track, 10 dbA difference between existing and (projected) project related noise is well explained. The effects of track type, cross overs, and speed are not well explained. These explanations should be added to text to make limitations and sensitivity of the model more transparent.

. The effects of the five speed levels should be summarized in a Table for all sampling sites. The variability of speed needs to be better explained. I suspect modifications of speed have a large effect on projected noise levels. This administrative control of lowering or increasing the speed of the train 5 or 10 miles per hour should be explained. The author indicates that he ran the noise projection model at presumably five different speeds from 10 to 50 miles per hour. This data needs to be part of the public record, so that the affected populations can effectively review and question how the speed of LRT affects the projected noise levels in their neighborhoods.

Comments on Proposed Train Schedule during Morning Rush Hour and Effects of Noise on Sleep

. As stated in the introduction I believe my home is within 150 feet to the center of the proposed track location. Table 4 of Noise Technical Report summarizes the operations of the proposed schedule of the Preferred Alternative plan. I question the need of 10 trips per hour at 6 AM to 7 AM. The Federal Transit Authority in its definition of Ldn defines nighttime as 10 PM to 7AM and that is the methodology used in this Technical Noise Report. To quote the report from page 3 "The Ldn descriptor was developed to account for the fact that people tend to be most sensitive to sound during typical sleeping hours. Many surveys have shown that Ldn is well

correlated with human annoyance, and therefore this descriptor is widely used to describe how humans perceive environmental noise."

I believe LRT operations during nighttime hours may cause a hardship to homeowners and renters due to sleep deprivation because of increased noise from train operations any time prior to 7 AM. In the Bethesda Chevy Chase neighborhoods many households are still sleeping until 7 AM. Operating on a rush hour schedule from 6 to 7 AM similar to the 7 to 9 AM schedule is not consistent with many, if not most, peoples sleep patterns and could lead to sleep deprivation. Also this time period is inconsistent with the Montgomery County Noise Ordinance which considers work from 9 PM to 7 AM to be night time and has stricter noise prohibitions on construction noise during nighttime work.

o Can MTA staff explain the inconsistency between FTA guidelines and regulations in the definition of nighttime activities and the operation of the proposed LRT at rush our parameters between 6 and 7 AM?

o What is the projected need for so many trips at that early hour? Does this override the sleep needs of the residents affected by the proposed Purple Line?

o I know you are matching the hours of operation of Metro. Is there robust survey data showing that people will use the LRT to get to work at these early hours?

I would recommend that you consider a non-rush hour schedule for these 6 to 7 AM time slot with a headway of 10 number of trips being 6 times per hour. If not already done the weighing of the time efficiencies in scheduled commute versus the loss of sleep to the surrounding community of various schedule alternatives should be formally evaluated and incorporate into the Purple Line FEIS document.

. I also believe that the speed of operation should be considered in sensitive residential areas such as Wisconsin Avenue (stop 1) to Connecticut Avenue (stop 2) from the 5 to 7 AM time periods. I cannot be quantitative in this suggestion, because I would need the data as requested above on the effect of speed on projected noise created by Preferred Alternate Plan at sampled locations. The qualitative argument is in the limited distance between stop 1 and 2 you could decrease speed by 5, or 10 miles per hour and have some corresponding decrease in the additional projected noise as expressed in dBA measurements. Another way of looking at this issue is by adding 30 seconds or a minute in schedule efficiency you can reduce train speeds and corresponding noise levels.

I request that MTA's noise consultant do such an analysis prior to finalizing of this FEIS report.

Comments on Projected Noise Exposures During Construction Activities 2015-2020

This is an excellent summary section identifying the major sources of construction noise that can impact property lines at a distance of 50 feet or greater. Typical activities include tunneling operations, pile driving and the use of heavy equipment for bridge and retaining wall work. Note that all these activities, except tunneling will be done in the Bethesda-Chevy Chase area between stations 1 and 2 traveling east. I believe Maryland Transit Authority (MTA) projects are technically not bound by local regulations. Therefore, MTA is pledging to abide by local noise ordinance, whenever feasible and reasonable They will also incorporate into contract specification documents performance standards for construction equipment to reduce noise associated with construction activity and to use the best available technology to control noise at residential properties. The MTA is also pledging to do noisy activities during the daytime, and route equipment and materials away from residential areas whenever possible and to respond to noise complaints promptly as well as provide adequate prior notifications of noisy projects.

All the above pledges and commitments sound very commendable, but they lack specificity. I believe the impacted public would be better served with a specific commitment by MTA to conform to Montgomery County general and construction noise ordinances including the creation of Noise Suppression Plan for exposures that exceed 75 dBA during the hours of 7 AM to 5 PM or Temporary Noise Waivers for noisy after hours or nighttime work. At the minimum the MTA should commit to submitting noise suppression and waiver plans in the Montgomery county jurisdictions. For consistency within the project the MTA should create a parallel system of suppression plans and waivers for work done in Prince Georges County.

Thank you for the opportunity to make these comments.

Neil C. Davis, CIH

NeilCDavis@verizon.net

Purple Line FEIS - RECORD #669 DETAIL

First Name : Dan
Last Name : Bolling
Email Address : Danbolling08@gmail.com

Submission Content/Notes : The Capital Crescent Trail is an example of a public health asset we need, that can continue to stem the tide of rising healthcare costs. The FEIS is flawed in that it fails to take into consideration not just the deleterious health effects on proximate neighbors of the frequent and noisy trains. The FEIS fails to consider the impact on the health of trail users who will be dissuaded from healthful exercise, and the added environmental impact of their increased resort to personal automobiles after the trail would be made less bike and pedestrian friendly.

C.3

Our government leaders should be doing all they can to get us out onto our feet and bikes, to improve our health, and prevent the further escalation of health care expenditure.

Purple Line FEIS - RECORD #672 DETAIL

First Name : R. Shoshana

Last Name : Mintz-Urquhart

Email Address : Mintz.Urquhart@gmail.com

Submission Content/Notes : Please save the beautiful, Capital Crescent Trail from the high noise levels of I coming trains.

C.3

We want to preserve the lovely Capital Crescent Trails.

Purple Line FEIS - RECORD #673 DETAIL

First Name : Calvin

Last Name : Burns

Email Address : calvinburns9@gmail.com

Submission Content/Notes : As a biker who often uses the trail I believe the community would suffer greatly if you destroyed it.

C.3

Purple Line FEIS - RECORD #674 DETAIL

First Name : katherine
Last Name : bradley
Email Address : kabradley64@gmail.com

Submission Content/Notes : The Environmental Impact Statement fails to adequately weigh the importance of this miraculously preserved open space to our community. In a built up suburban area, the Capital Crescent Trail is a treasure that should be saved--home to bikers, hikers, dog walkers and wildlife. I think the needs of the Silver Spring Bethesda community could be met at a much lower cost and environmental impact by a high speed bus that would run on special lanes during rush hour. I supported the Purple Line until I attended a community meeting that showed what the remaining hiker-biker trail would really be like. With the noise from the trains and the frequency with which they run, the trail would be unpleasant at best--a far cry from its current verdant peacefulness. I would urge you to reject this EIS until some way is found to protect the trail in a meaningful way.

C.3

Thank you,

Katherine Bradley

Purple Line FEIS - RECORD #675 DETAIL

First Name : Carmen
Last Name : Iribarren
Email Address : Carmen.iribarren@gmail.com

Submission Content/Notes : The trail is vital To Montgomery County, esp. To the neighborhoods adjacent to it like mine. I live where I do in a large part because of the trail. A lot of people use it regularly esp. On weekends and when the weather is nice. I know quite a few people who also use it to get to work and back. It is a jewel and adds quite a bit of quality of life to the area. Let's preserve it and keep it nice.

C.3

Purple Line FEIS - RECORD #676 DETAIL

First Name : Patricia
Last Name : Friedman
Email Address : levinfried@gmail.com
Submission Content/Notes : Please keep our trail green!

C.3

Purple Line FEIS - RECORD #677 DETAIL

First Name : Tom

Last Name : Armstrong

Email Address : jtarmstrong1@gmail.com

Submission Content/Notes : Attached are my comments on the Purple Line FEIS.

--Tom Armstrong
jtarmstrong1@gmail.com

Attachments : PL FEIS response Tom Armstrong.docx (17 kb)

October 21, 2013

Purple Line FEIS Maryland Transit Administration
Transit Development & Delivery
100 S. Charles Street – Tower Two, Suite 700
Baltimore, MD 21201

Comments on the Final Environmental Impact Statement

C.2

The Final Environmental Impact Statement that the MTA has produced is severely deficient in its treatment of the portion of the currently proposed Purple Line route from the Silver Spring Transit Center to Sligo Creek and fails to deal with the incompatibility of the current alignment along Wayne Ave. with this residential neighborhood. MTA is proposing to place a large transit power substation (TPSS) in the middle of this residential area, and seems intent on imposing a station at Dale Dr. without demonstrating the community consensus that the County Council has asked for. Meanwhile MTA is seemingly more responsive to the concerns of affected parties west of Rock Creek. The FEIS also demonstrates numerous shortcomings of the Purple Line project as a whole. In particular, it offers miniscule traffic and environmental benefits with a high price tag. While the cost-effectiveness of this project is an inescapable consequence of choosing light rail over less expensive and more flexible options, at least shortcomings in the Silver Spring area could be addressed by putting the Wayne Ave. segment in a tunnel, an alternative that MTA should seriously consider.

F.1

Wayne Avenue is the most severely affected part of the Purple Line route.

The Wayne Ave. portion of the proposed route is the only part on which the Purple Line would run at grade through a residential neighborhood. In this regard, it is unique among all the existing or proposed light rail systems in Maryland. However, the FEIS (see p. 4-26) reveals that MTA thinks of “Silver Spring” primarily as the redeveloped downtown. The FEIS fails to address numerous effects that the Purple Line would have on the residential neighborhoods that surround this portion of the route. Here are some examples:

E.7

- The streetscape of Wayne Ave. will be severely degraded if the proposed routing is used, a result that is given short shrift in the FEIS.

D.2

- Most of Wayne Ave. would become significantly wider; for instance, at Dale Dr., the width of Wayne Ave. as shown in the MTA’s drawings is equal to the width of Colesville Rd. at Dale Dr. The additional width comes at the expense of trees and green lawns.

E.11

- The trees will be replaced with a forest of poles to support the catenary wires supplying power to the trains. The MTA feels that those poles and wires will have no adverse effect, as if they were no different than the much smaller number of poles and electrical wires that are currently present. They will, in fact, be much more intrusive.

E.14

- Retaining walls will be needed along significant stretches according to detailed MTA drawings.

C.4

- MTA’s drawings show a large and intrusive traction power substation (TPSS) located on Wayne Ave. next door to two houses. This structure, 50 ft. long, must be surrounded by a high fence or wall with 10 ft. clearance around the structure. The combination of fencing and

structure will be significantly larger and more conspicuous than typical houses in the neighborhood and will exacerbate the industrial appearance of the street. **The MTA must not use its current drawings as the final word on the placement of that TPSS. Its placement must be held open while MTA and the residents nearby seek – and find – an alternative.**

D.3

- Pedestrian safety along Wayne Ave. between Cedar St. and Dale Dr. is not addressed in the FEIS. The FEIS (p. 3-13) states that a new signalized pedestrian crosswalk is included in the project, but no such crosswalk appears on the drawings. The increased width of Wayne Ave. will exacerbate the safety problems that already affect pedestrians crossing Wayne at Springvale Rd. and Dartmouth Ave.

E.7

- Environmental effects on trees and groundwater are inadequately addressed.
 - This proposed alignment would result in the loss of numerous large trees, particularly near Whole Foods and near the Silver Spring International Middle School. Our neighborhood is already losing a significant fraction of its trees due to development at the Chelsea School site.
 - The significant widening of most of Wayne Ave. would increase the area of impervious surfaces. The current amount of pavement in this area has already led to the degradation of Sligo Creek.

E.9

- Inadequate attention is given to noise.
 - Squealing noise on the slopes and curves of Wayne Ave. cannot reasonably be mitigated by lubrication (the only solution offered in the FEIS), since the trains would share the roadway with cars.
 - Trains along Wayne Ave. would be required to sound bells and/or horns at uncontrolled intersections (at Springvale Rd., Cloverfield Rd., Greenbrier Dr., and Dartmouth Ave.) and when entering and leaving stations. This noise issue is not addressed in the FEIS; the “certain grade crossings” where a bell or horn is to be used are not identified.
 - Predicted “moderate” sound impacts included only seven single-family homes along Wayne Ave. but should clearly include the nearly 40 other such homes along Wayne that are equally close to the rail line and are near grade crossings.

A station at Dale Drive is not yet approved.

F.1

The proposed Dale Dr. station is too close to the Manchester and Silver Spring Library stations to be useful. There is insufficient ridership in this purely single-family residential area to justify it, and creation of space for the station needlessly widens Wayne Avenue. Yet MTA persists in assuming – and desiring (see remarks by Mike Madden, May 2010: <http://montgomerycountydaily.blogspot.com/2010/05/mta-pushing-for-additional-purple-line.html>) – that a station at Dale Dr. be built, even though the County Council requested that the station not be built until there was a neighborhood consensus that it should be built. Neither the County nor MTA has demonstrated such a consensus, or even attempted to determine whether such a consensus exists. **Until the County and the community concur that a Dale Dr. station should be built, MTA should remove it from their plans.**

There is a marked disparity between accommodations to public concerns west of Rock Creek vs. east of Rock Creek.

Prime examples include building a bridge over Connecticut Ave. – but crossing Georgia Ave. at grade; encouraging the razing of an entire building in Bethesda to accommodate a replacement bike tunnel under Wisconsin Ave. – but squeezing the Silver Spring “Green” Trail onto the lawns of the houses on Wayne Ave.; and adding miles of sound barriers in the Chevy Chase Lake area – but subjecting Wayne Ave. to clanging bells and honking horns. All of those improvements west of the Creek are worthwhile, but they should be matched by improvements east of the Creek as well.

E.8

This project does not significantly reduce traffic or improve air quality.

As public officials have acknowledged, the driver for the Purple Line is economic development, not transportation efficiency. The projected reduction in vehicle trips is 0.061%, or one part in 1,600, over the region (FEIS Table 3.8). MTA claims a significant reduction in the Purple Line corridor, but the FEIS does not demonstrate this claim: Table 3.9 shows “Change in Vehicle Trips,” but nowhere does the FEIS tell us the total number of trips, so we do not know the fraction of total trips reduced. Volume III of the FEIS demonstrates that the change in levels of pollutants is negligible (e.g., Technical Report: Air Quality, table 7 (p. 31).

The cost effectiveness of this project is low.

K.2

The current cost estimate – undoubtedly an underestimate, unless MTA can point to any previous projects of this magnitude that came in on or under budget – is \$2.15B for a 16-mile system, a cost of \$134M per mile. This cost is several times as high as the cost of a bus rapid transit system. For this cost, all the Ride-On buses could be replaced, several times over, with new, state-of-the-art gas-hybrid buses that would be just as attractive as the Purple Line equipment.

There is a solution to most, if not all, of these concerns: put the Wayne Ave. portion of the route in a tunnel.

F.1

If the Purple Line is to be built in spite of its high cost per mile, a solution to the remaining concerns is available, but has been almost entirely neglected by MTA. The Purple Line could be built *underneath* Wayne Ave., as the community suggested several years ago. At that time, MTA reluctantly agreed to study that option, but did not do a serious engineering study. MTA later claimed that it would be too expensive. In the light of the \$14M bridge over Connecticut Ave. and other mitigations elsewhere along the route, MTA at least should have an outside engineering firm give this option serious consideration and develop a detailed cost estimate.

Respectfully,

Tom Armstrong
606 Greenbrier Dr.
Silver Spring, MD 20910

Purple Line FEIS - RECORD #678 DETAIL

First Name : Reed
Last Name : Dewey
Email Address : reed-dewey@verizon.net

Submission Content/Notes : To Whom it may concern:

The Capital Crescent Trail is a true gem that I and my family have enjoyed for many years. It is a priceless natural resource that once gone cannot be brought back. Like other parts of the Purple Line, run it along East-West Highway. There are few houses there, and it's terminus as right at Metro, not 2-3 blocks away from it as the current proposed plan details.

C.3

E.4

Don't let Chevy Chase Land Trust push their self interested agenda on our community for their own personal gain. We all know the Purple line would make their Chevy Chase Lakes property even more valuable than it already is.

Just in my family alone, we ride our bikes on the trail, we take walks with friends, and my husband, who is starting a new job, will have the perfect green commute riding his bike from Bethesda to Silver Spring.

I do not even want to fathom how adversely the changes that are being proposed will impact our lives and the lives of so many. Trains running alongside the trail will completely change the trail and I have deep concerns about the implications on health, safety, and loss of biodiversity.

C.2

Beautiful, undeveloped places like the trail are too rare as it is. Although I recognize the purple line plan is going forward, I wish we could find an alternative that would preserve this treasure for us and for future generations. What is currently being proposed will be a huge and irreversible loss.

Reed Dewey
4618 DeRussey Parkway
Chevy Chase, MD 20815

Purple Line FEIS - RECORD #679 DETAIL

First Name : Kristine
Last Name : Martinez
Email Address : ktaberski@aol.com

Submission Content/Notes : The Capital Crescent Trail is one of the best, if not the best, features of DC/MD. It provides a multitude of DC and MD residents with easy, safe access to the outdoors. Children can learn healthy lifestyle choices by integrating exercise early - helping to address the obesity problem that is plaguing our children today.

C.3

Please do not take away our trail.

Purple Line FEIS - RECORD #681 DETAIL

First Name : Robert
Last Name : Fox
Email Address : rob.env.fox@gmail.com

Submission Content/Notes : I have used the Capital Crescent Trail many times, including every day for several years to commute to work, and it would be a travesty to destroy it's beauty and tranquility. Please help protect it and find a way to not harm the trail, the trees, and the wildlife that depend upon its current state.

C.3

Thank you

Purple Line FEIS - RECORD #682 DETAIL

First Name : Jeff

Last Name : Dunckel

Business/Agency/Association Name : Montgomery County's Pedestrian, Bicycle, and Traffic Safety Advisory

Email Address : Jeff.Dunckel@montgomerycountymd.gov

Submission Content/Notes : Maryland Transit Administration,

Montgomery County's Pedestrian, Bicycle, and Traffic Safety Advisory Committee would like to offer the following comments on the Purple Line's Final Environmental Impact Statement. These comments were approved by the full committee on September 12, 2013. The Pedestrian, Bicycle, and Traffic Safety Advisory Committee is authorized under Montgomery County legislation to advise the County Executive and the County Council on issues pertaining to pedestrian safety in the County. Mike Madden of the Maryland Transit Authority made a presentation to the committee on July 11, 2013.

Action items following the presentation of the Purple Line project - July 11, 2013

D.3

It is not evident from available information that the Purple line has a clear vision to shift the County's mode share from single occupancy motor vehicle to transit, walking and bicycling. In many locations with dense development and population, wide multi-lane roads are illustrated on both sides of the light rail which doesn't further the TOD goals of the project (slide 4 of presentation) or match successful light rail systems in other cities. In many instances, additional travel or turn lanes are being constructed which is lengthening crossing distances, reducing safety for pedestrians, and is detrimental to the pedestrian environment. In order to create vibrant retail hubs in key centers along the Purple Line's path, the transit system needs to be effective and efficient, but also enticing to pedestrians with a street cross section that prioritizes transit, pedestrian and bicycle travel over motor vehicle travel. We don't see any illustrations that reflect successful light rail and TOD development in other cities like Portland (shown below).

MOTION: No Additional Lane Capacity

Voted, that the PBTSAC recommend to the County Executive and County Council that in central business districts, locations with other high capacity transit services (metro stations, bus hubs), locations with high pedestrian volumes and planned pedestrian generators, that no additional lane capacity be provided for motor vehicles, including no additional turn lanes. Instead, right of way should be dedicated to bicycle facilities, promenades with wide planting strips and street trees.

The motion was unanimously approved.

MOTION: Specifications for Crossings

Voted, that the PBTSAC recommend to the County Executive and County Council that anywhere the Purple Line travels through central business districts, locations with other transit services (metro stations, bus hubs), locations with high pedestrian volumes and planned pedestrian generators, crossings should include raised pedestrian refuge islands (that cross over the striped crosswalk), tight turning radii, and planting strips with street trees.

The motion was unanimously approved.

Thank you for accepting our comments pertaining to the Purple Line's design.

Erwin Mack, Chair

Pedestrian, Bicycle, and Traffic Safety Advisory Committee

8107 Chester Street

Takoma Park, Maryland 20912

Purple Line FEIS - RECORD #683 DETAIL

First Name : Mario
Last Name : Gobbo
Email Address : gobbomario@gmail.com

Submission Content/Notes : The trail is very important to me. I bike on it at least once a week and walk it several times a week on it. It is essentially the only exercise I get. It is a wonderful and irreplaceable asset to all who live in the greater Washington DC area and it would be a real shame to spoil it in any way. Although I recognize the need for and support public transportation, I feel an alternative way must be found to keep such a treasure as the trail alive and working for us all.

C.3

Purple Line FEIS - RECORD #684 DETAIL

First Name : Bruce

Last Name : Baird

Email Address : bbaird@cov.com

Submission Content/Notes : The Capital Crescent Trail is an irreplaceable place of exercise, renewal and psychological and physical recreation in the midst of an increasingly urban area. It can quickly be reached by large numbers of people. If a train is needed, it is shortsighted to build it in the one place that will destroy a natural resource.

C.3

Purple Line FEIS - RECORD #685 DETAIL

First Name : Andrea
Last Name : Kelly
Email Address : akellydc@gmail.com

Submission Content/Notes : Dear

E.14

K.5

F.4

I am a resident of Rosemary Hills in Silver Spring. Please find below my comments on the Final Environmental Impact Statement (FEIS). Unfortunately, there are a number of critical gaps in the FEIS's public interest analysis including the failure to adequately document and plan mitigation for the social, environmental, and economic harms that will be imposed upon the residential communities and public institutions in the Rosemary Hills/Lyttonsville/Rock Creek Forest area adjacent to the Purple Line. In particular, the FEIS fails to adequately take into consideration the direct, indirect, and cumulative impacts that will negatively impact (1) the approximately 700 children at Rosemary Hills Elementary School (kindergarten through Second grade), (2) the historic Lyttonsville Community, and (3) low income residential community living in the Barrington Apartments. I specifically request that the FEIS be rejected as insufficient unless and until it is revised to adequately take into consideration these impacts and specific measurable mitigation techniques are incorporated into the FEIS and/or any Record of Decisions that results from administrative review of the FEIS.

Background on the community: As you may be aware, the Rosemary Hills/Lyttonsville/Rock Creek Forest neighborhood is unique – it is a dense neighborhood of both single family homes on small plots of land and multiple apartment complexes with a population of approximately 5,000 individuals. The neighborhood is highly diverse in almost every way possible - almost every race, culture and religion is represented within the community. Despite this high density and socio-economic diversity, the neighborhood has a delightful small town feeling that is due in large part to the quiet and peaceful nature of the community. But the neighborhood is also fragile. The renters in the neighborhood are approximately 60% of the population. There are multiple apartment complexes (with many complexes including multiple buildings) that cater to low and moderate income communities. Three of the apartment complexes located in the neighborhood are specifically set aside as Section 8/Housing Opportunities Commission (HOC) housing. Specifically, Friendly Gardens located at 2423 Lyttonsville Road, Barrington Apartments located at 1912-16 Rosemary Hill Drive, and Paddington Square Apartments located at 8800 Lanier Drive. Many residents live below the levels considered necessary for basic economic security.

Historic African American Community: The Lyttonsville portion of the community is also notably as a historic community. An exhibit that is frequently presented at the neighborhood's Gwendolyn E. Coffield Center includes historical documents regarding the Lyttonsville community. The

community retains a copy of the original 1853 deed of the land to Samuel Lytton, a freed slave, who founded Lyttonsville. An article that your staff might find useful is >
<http://silverspringspeaks.blogspot.com/2011/03/lyttonsville-living-history-hidden-in.html> ("Lyttonsville: Living History Hidden in Plain Sight"). The community history tells some of the struggles it has faced over the years. These struggles epitomize why the field of Environmental Justice was formed - that low income minority communities too often fail to get public services but get a disproportionate share of public burdens. Simply put, Lyttonsville has historically had to fight for services from the Federal, State and Local governments while simultaneously fighting against being chosen to house public works that would hurt the Lyttonsville community. In point of fact, as recently as the 2011-2012, entities attempted to take the Parkland from the Community. In particular, there was an unsuccessful attempt to take Rosemary Hills/Lyttonsville Local Park from the community - with neither the knowledge nor consent of the community - as a result of secret meetings by Montgomery County School system. The Community defeated such an effort but it represented a classic example of why the Environmental Justice field exists – the needs and desires of the disadvantaged community were simply not seen by the decision makers until the decision became public. There were also several unsuccessful attempts to zone some of the parkland in the community as industrial in the 1970s.

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*

Specific Impacts on Lyttonsville. Unfortunately, history has a habit of repeating itself, and even today, in 2013, Lyttonsville appears to suffer more burdens and fewer benefits from the Purple Line than other communities. Most telling, the FEIS failed to even include the Rosemary Hills/Lyttonsville Local Park and the Community Center in its report despite being located across the street from the Purple Line and the planned maintenance facility. In addition, Lyttonsville was selected to house a maintenance facility, a questionable decision in light of the history of land being taken from the community to house public works. While some efforts were undertaken to mitigate the train maintenance facility, an underlying concern of the community remains unaddressed. In particular, the community is concerned that the yard precluded any eventual development of the frontage on Brookville Road east of Lyttonsville Place. The potential for redevelopment in this area will be a focus of the Lyttonsville Sector Plan – soon to recommence by the Planning board. In particular, there is concern that there will be significant impacts to Lyttonsville and Brookville Road and offsetting roads such as East-West Highway as a result of the activity surrounding the maintenance and storage

facility. The FEIS should provide more analysis on potential impacts to Lyttonsville as a result of the day to day operations of the maintenance facility. Further the FEIS should propose specific measurable and enforceable mitigation techniques in the FEIS and/or subsequent Record of Decision.

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Negative Impacts on 700 small children at Rosemary Hills School.

E.9

E.10

The preferred alternative for the Purple Line will run within 69 feet of RHPS, a primary school consisting of approximately 700 children in grades Kindergarten to second. The FEIS fails to adequately analyze the direct, indirect and cumulative impacts of this project on RHPS and the surrounding neighborhood. Foremost, the EIS fails to adequately analyze the noise and vibration impacts on the school as well as the impacts from construction. While the EIS suggests that there may be future site specific assessments and appropriate mitigation measures this is inadequate under the National Environmental Policy Act (NEPA). The vague and equivocal offer to "coordinate with" Rosemary Hills Elementary School, "to minimize disruptions to the extent reasonably feasible" is inadequate. A comparison between the sporadic use of the existing freight line is not sufficient. The FEIS must consider the whole spectrum of impacts on the small children at the school. Essential to an adequate EIS are assessment of the social, economic, and environmental impacts of a proposed action or project and consideration of appropriate impact mitigation: avoidance, minimization and compensation. For the "credit" of mitigation to have any meaning it must be something that an agency identifies in a NEPA document and commits to implement to achieve an environmentally. Simply disclosing that mitigation is possible and will reduce impacts does not appreciably advance the analysis of the FEIS. Mitigation measures should be clearly described as part of the proposed action and implemented with the proposed action. Otherwise, the mitigation cannot be relied upon in determining which alternative is environmentally superior. The FEIS fails to adequately address the impacts to the children at Rosemary Hills Elementary School, many of who qualify for Free and Reduced School Meals (FARMS) and/or English as a second language (ESOL). Further the FEIS should propose specific measurable and enforceable mitigation techniques in the FEIS and/or subsequent Record of Decision.

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Negative Impacts on Low Income Community at Barrington Apartments. As with the school, the FEIS fails to adequately analyze the direct, indirect

and cumulative impacts of this project on the low income community that resides at the Barrington Apartments. The FEIS notes that the Barrington Apartments will experience vibration levels that will exceed FTA Criteria Levels. The findings for the Barrington Apartments are attributable to the combination of operation of CSX freight trains and the Purple Line. The FEIS states that the MTA will perform site specific assessments of the identified areas and develop appropriate mitigation measures. Simply disclosing the possibility of negative impacts on the community and the possibility of mitigation is insufficient. Instead, mitigation measures should be clearly described as part of the proposed action.

Disparate Accommodations: Different Treatment of Similarly Impacted Communities. Finally, I must note that there appears to be a disconnect in accommodations proffered in the design of the Purple Line. In sum, the wealthy communities of Bethesda and Chevy Chase have won numerous design concessions and mitigations that are not afforded to the less wealthy communities in Silver Spring. The particular concessions afforded the Columbia Country Club = in particular limitations of construction impacts, noise mitigation techniques, visual design mitigation techniques – should be provided for all impacted communities. Notably, the Country Club appears to have achieved what other communities have not obtained in the FEIS – a clear and binding record of the specific mitigation techniques that will be employed. Rigorous design and the best mitigation techniques should not be the right of only the well-connected wealthy communities, but also the right of all impacted communities, but in particular, those communities that have been historically excluded from decision making process and should obtain special consideration under Environmental Justice principles.

In closing, I request that the FEIS be rejected as insufficient unless and until it is revised to adequately take into consideration the direct, indirect, and cumulative impacts that the Purple Line will have on (1) the 700 children at Rosemary Hills School (kindergarten through Second grade, (2) the historic African American Lyttonsville Community, and (3) low income residential community living in the Barrington Apartments. Any such revision must include specific mitigation techniques instead of vague unenforceable statements regarding the goal of working with the community in the future.

Respectfully submitted,

Andrea Ines Kelly
2204 Richland Place
Silver Spring, Md 20910

Purple Line FEIS - RECORD #686 DETAIL

First Name : Noreen
Last Name : Paul
Email Address : Ncpaul8800@hotmail.com

Submission Content/Notes : I think the "Purple Line" is a ridiculous sell out to real estate developers, who cannot wait to "find" more land to develop inside the Beltway. Remember almost 60 years ago the government tried to build a highway on the C&O Canal. What an irreplaceable loss that would have been, I would put the loss of the Crescent Trail to the building of he "Purple Line" in the same category. Why don't you propose a high speed bus lanes, like up and coming countries are doing? That would provide transportation, not the boon doggle for real estate developers. If you put it to a vote of Montgomery County voters it would never pass, because to the average tax payer there is no benefit except noise and traffic and the spending of more tax dollars on a ridiculous project. Can you not be better stewards of tax dollars, parks and recreation areas or do our representatives represent the interests of real estate developers. Wake up! Are you are hell bent on destroying one of our county's vital recreation areas that make our county a great place to live?

C.1

C.3

E.4

Thank you,
Noreen Paul

Purple Line FEIS - RECORD #687 DETAIL

First Name : Zorayda
Last Name : Moreira
Business/Agency/Association Name : CASA de Maryland
Email Address : zmoreira@casamd.org
Submission Content/Notes : *Zorayda Moreira-Smith*

E.14

Manager of Housing, Community and Economic Development

CASA de Maryland, Inc.

8151 15th Avenue

Langley Park, MD 20783

Phone: 240-491-5761

Fax: 301-408-4123

“*Tell me and I forget, teach me and I may remember, involve me and I learn*.”

- Benjamin Franklin

Attachments : Petitions (2).pdf (14 mb)

PETITION

The International Corridor is home to residents representing over 150 countries and a vast array of minority-owned small businesses that complement this diversity. The Purple line will serve a community whose riders will benefit from greater transit access. Despite the benefit of better transit, there are also deep concerns that the Purple Line will threaten this vibrant community by indirectly displacing them because of the lack of affordable housing, small business preservation tools, and a failure to commit to local jobs. We expressed similar concerns in our comments in 2009 when we submitted a similar petition to the draft environmental impact statement but there has been no response. The Final Environmental Impact Statement fails to provide a mitigation strategy that adequately addresses these concerns; therefore, we strongly urge MTA and all respective stakeholders to create a Purple Line Compact, a document that outlines the mitigation strategy to address the displacement concerns. Thank you.

El Corredor Internacional es el hogar de los residentes que representan a más de 150 países y pequeños negocios propiedad de minorías que complementan esta diversidad. La Línea Morada servirá a una comunidad cuyos corredores se beneficiarán de un mayor acceso de tránsito. A pesar de la ventaja de tener mejor tránsito, también existen profundas preocupaciones en el Corredor Internacional que la Línea Morada amenazara esta comunidad indirectamente con el desplazamiento a causa de la falta de vivienda bajo costo, herramientas para ayudar a los negocios pequeños y una falta de compromiso con el empleo local. Hemos expresado nuestra preocupación en nuestros comentarios en 2009 cuando presentamos una petición similar al proyecto de declaración de impacto ambiental. La Declaración de Impacto Ambiental Final no proporciona una estrategia de mitigación que es adecuada. Recomendamos que MTA y todos los respectivos grupos de interés la creación de un Compacto para la Línea Morada, un documento que describe la estrategia de mitigación para afrontar las preocupaciones de desplazamiento. Gracias.

Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Maria de J. Ayala	20783
10/17/2013	Carlos Garcia	20901
10/17/2013	Maria Lucia Espindola	20782
10/17/13	Abigail Umazor	20783
10/17/13	Jeff Meetre	20781
10/17/13	Shannon Wilk de Benitez	20906
10/17/13	Victor Rodriguez	20902
10/18/13	Marcela Alvarado	20848
10/18/13	Ben Usamayta	20878

1A-4



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Yanira Melendez	20902
10-18-13	Duay Miranda	20912 20770
10/17/13	Francisco Medina	20770 20912
10/17/13	Jorge A. Martinez	20901
10/17/13	Magdiel Jovellana	20912
10-17-13	Egwin Yavarado	20785
10/17/13	Suzanne Spunt	20906
10-18-13	[Signature]	20871

1A-21



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Doménica Marchesini	20783
10/17/13	Edgar Juarez	20783
10/17/13	Glenda Gonsales	20783
10/17/13	Ambalobas	20783
10/17/13	William Quintanilla	20740
10/17/13	Edwin Mejia	20740
10/17/13	Peggy Stolo	20832
10/18/13	Juan Narante	20002

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
October 17/2013	Ana Gomez	20904
October 17, 2013	Jovane Gutiérrez	20782
October, 17, 2013	Francisca Leon	20903
October 17/ 2013	Blanca I. Zelaya.	20866
10/17/2013	Favio Sanchez	20783
10/17/2013	Reina Bonilla	20815

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
9-17-13	Amilcar Vicente	20901
10-17-2013	Agusta Vega	20901
10-17-2013	012 Lourdes Devia	20904
10-17-2013	PATRICIA CARASCO	20902
10-17-2013	Yare Gonzalez	20784

PETITION

3b

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Daniel A. Martinez	20783
10/17/13	Jose Ovidio Ramirez	20783
10-17-2013	Edya Cascof	20901
10-17-2013	Cristina Mendez	20783
10-17-13	Dora Calel	20895
10/17-13	Deisy Faruá	20815
10/17/13	Dora A Flores	20901

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
	David Euceda Escamotodo	20903
	Elma Natalia Hernandez	
	Carlos Chicas	
	Landy aguilera	20903
	Yvonne Andujar	
	Tigris Vargas	20902
	HUBIO ZACIQA	
	Abdulla Coarais	20895

Claudia G.
Level 1A



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
	Rolando K. Abreu	20903
	Gloria Cruz	20783
	Sagwahin matara	20783
	Marta Pokio	20912
	Ana Alvarez	20905
	Reyna Q. Villalta	20901
	Iris Mayans	20783
	Ronald	20903
	Elias Perez	20783

1A-2



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Ivoin Uises Flores	20903
10/17/13	Antonio Pesson Sales	20903
10/17/13	Gerson Manuel Castañeda	20783
10/17/13	Silvia M González	90919
10/17/13	Roberto Cruz	20783
10/17/13	Marta Escamilla	20781
10/17/13	Hildesimo Apple	20012
10/19/13	Rosaura Gonzalez	20904



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Marino Gudiol Garcia	20783
10/17/2013	Guillermo Fuentes	20901
10/17/2013	Leisy Vargas	20902
10-17/2013	Anabel Rivas	20783

BASIC EDWIN A.



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Isaias Fuentes	20901
10/17/13	Manuel Alvarez	20903
10/17/13	Alfonso Lopez	20783
10/17/13	Beatriz Escobar	20901
10/17/13	Maria Castro	20912
10/17/13	Marily Campos	20783
10/17/13	Alvarez Marin	20783
10/17/13	Jessica Savel	20917
10/17/13	Luis Gonzales	20901

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Mirna Baires	20710
10/17/13	CWELSON GONZALEZ	20783
10/17/13	Alfredo Laveto	20912
10/17/13	Wiler Gando	20912
10/17/13	Jose A Menjine	20743
10/17/13	CARMEN HERNANDEZ	20895
10/17/13	Jorge Estrella	20903
10/17/13	Gladis Traheto	20902
10/17/13	Maria E Hernandez Bañón	20903

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-2013	Angel Vazquez	20907
10-17-2013	Madina Monte	20783
10-17-2013	Isabel Castro	20903
10-17-13	Maria Martinez	20912
10/17/13	Cecilia Vazquez	20783
10/17/13	Gilmar Perez	20783
10/17/13	Novia mendoza	20904
10/17/2013	Santos Romero	20904
10/17/2013	Angelina Lopez	20901



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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Ana Urias	20743
10/17/13	Andres Juarez	20782
9/13/09	Fredo Cruz	20852




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PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
	 <i>Hermilio Diaz</i>	
		
	<i>Sonia Encina</i>	
10-17-2013	<i>Alfredo Martinez</i>	20763
		
	<i>BAYRON VAIL</i>	

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Adya Perez	
10 17 13	[Signature]	
10 17 13	Salvador Ayala	
10 17 13	Samuel Elsy Amaya	20737
10 17 13	Carlos E Resino	
10 17 13	Carlos Morda	
10.17.15	Salvador Sator	20784

/A-5



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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Barbara Gibbs	20912
10-17-13	Verónica Lonto	20912
10-17-13	Leni Ramirez	20770
10-17-13	[Illegible]	20782
10-17-13	Norma Chava	20706
10-17-13	Juan Romero	20912
10-17-13	Blanca Tobías	20783

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Marvin Antonio Amaya	20783
10/17/2013	José M Benitez	20900
10/17/2013	María M. Apolera	20705
10/17/2013	Luis O. Rodriguez	20903
10/17/13	María Rodriguez	20783
10/17/13	Marcos Ramirez G.	20783

18



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Nery Mejía	20912
10/17/13	Suzana Martinez	20902
10/17/13	Jorge Aquino	20783
10-17-13	ELY BRITO	20903

JA

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-2013	Jose O Blanco	20906
10-17-2013	Nelson O Gomez	20783
10-17-2013	Lizandro Morales	20783
10-17-2013	Carlos Alfaro	20902

AA

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Nidi Tenabe	20906
10/17/2013	Marise Jonty	20904

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Elizabeth Vásquez	20902
10-17-13	Samuel Gomez	20783
10-17-13	Jose Arjeto	20783
10-17-13	Yanori Carranza	20902
10-17-13	Seser Tadeo	20702
10-17-13	Soe Milian	20788
10-17-13	Yony Orozco	20904
10-17-13	Martin Garcia	20783
10-17-13	Martin Brando	20902

5A



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Jose Diaz	20903
10/17/13	Armando Coronado Perez	20901
10/17/13	Leda T. Garcia	20902
10/17/13	Macario Ortega	20783

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
17-10-013	Young Cabrera	20783
10-17-13	Volmont Jean	20783
10-18-13	Eulynne Matuge	20783

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/16/2013	Rosa M. Flamenco	20853
10-17-2013	Rosa R. Tsusi	20901
10-17-2013	Daniel A. Gomez	20901
10-18-2013	Edon W. Orellana	20912

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Date/Fecha	Name/Nombre	Zip Code/Código
17-2013	Viola Gale	20895
10-17-13	AZUL POLO	20912
10-17-13	Irisa Rosales	20853
10-17-13	Luz Arina	20783
10-17-13	Idania Reyes	20906
10-17-13	Ernesto Saravia	20910
10-17-13	Roberto Bol	20910
10-17-13	Javier Euzman	20902

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Date/Fecha	Name/Nombre	Zip Code/Código
10-18-13	Jorge Berra	20784
10/18-13	BERNABE MATIASO	20903
10/18-13	Jemimah Muarenga	20784
10/18/13	Juan Reyes	20737
10-18-13	[Signature]	16243
10-18-13	MAURICIO MESTIA	20902
10-18-13	Helda Linares Arceles	20012
10-18-13	Sabrina Porton	20906
10-18-13	Adree Nobby	20832
10-18-13	Ma. Elena S.L.	20906

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Date/Fecha	Name/Nombre	Zip Code/Código
10/18/2013	SEAN WADDALE	209502
10/18/2013	HENRY JOAN CLAUDE	207820
10/18/2013	ARLAND L. TSOBGOU	20903
10/18/2013	SIDORE LIANEA	20783
10/18/2013	HENRY POH	20782
10/18/2013	ROBERT BUSINGRE	11
10/18/2013	Abolix Maudine	20919
10/18/13	Jose J. Ramirez	20903
10-18-13	Jose Turecius	
10-18-13	José Castañeda	

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Date/Fecha	Name/Nombre	Zip Code/Código
10/18/2013	Jacinta Nino	20850
10/18/2013	WILFRED MOKOKO	20912
10/18/2013	SIMON TANTO	20912
10-18-2013	SALOTUR SESAO	20185
10-18-13	FABIEN NSELEKAM	20783
10-18-13	DENIS TAFFOU	20011
10-18-13	PATRICK SIEME	20903
10-18-13	Johnson Teboh	20902
10-18-13	RAPHAEL TCHAPI	20923

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Maria de J. Ayala	20783
10/17/2013	Carlos Garcia	20901
10/17/2013	Maria Lucia Espindola	20782
10/17/13	Abigail Umazor	20783
10/17/13	Jeff Meetre	20781
10/17/13	Shannon Wilk de Benitez	20906
10/17/13	Victor Rodriguez	20902
10/18/13	Marcela Alvarado	20848
10/18/13	Ben Usamayta	20878

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PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Yanira Melendez	20902
10-18-13	Duay Miranda	20912 20770
10/17/13	Francisco Medina	20770 20912
10/17/13	Jorge A Martinez	20901
10/17/13	Magdiel Jovellana	20912
10-17-13	Egwin Yavarate	20785
10/17/13	Suzanne Spunt	20906
10-18-13	[Signature]	20871

1A-21

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Doménica Marchesini	20783
10/17/13	Edgar Juarez	20783
10/17/13	Glenda Gonsales	20783
10/17/13	Amibabacas	20783
10/17/13	William Quintanilla	20740
10/17/13	Edwin Mejia	20740
10/17/13	Peggy Stolo	20832
10/18/13	Juan Narante	20002

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Date/Fecha	Name/Nombre	Zip Code/Código
October 17/2013	Ana Gamez	20904
October 17, 2013	Yvonne Gutiérrez	20782
October, 17, 2013	Francisca Leon	20903
October 17/ 2013	Blanca I. Zelaya.	20866
10/17/2013	Favio Sanchez	20783
10/17/2013	Reina Bonilla	20815

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Date/Fecha	Name/Nombre	Zip Code/Código
9-17-13	Amilcar Vicente	20901
10-17-2013	Agusta Vega	20901
10-17-2013	012 Lourdes Devia	20904
10-17-2013	PATRICIA CARASCO	20902
10-17-2013	Yare Gonzalez	20784

PETITION

3b

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Daniel A. Martinez	20783
10/17/13	Jose Ouidio Ramirez	20783
10-17-2013	Edya Cascof	20901
10-17-2013	Cristina Mendez	20783
10-17-13	Dora Calel	20895
10/17-13	Deisy Faruá	20815
10/17/13	Dora A Flores	20901

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
	David Euceda Escamotodo	20903
	Elma Natalia Hernandez	
	Carlos Chicas	
	Landy aguilera	20903
	Yvonne Andujar	
	Tigris Vargas	20902
	Humberto Garcia	
	Abdulla Coariza	20895

Claudia G.
Level 1A



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
	Rolando K. Abreu	20903
	Gloria Cruz	20783
	Sagwahin matara	20783
	Marta Pokio	20912
	Ana Alvarez	20905
	Reyna Q. Villalta	20901
	Iris Mayans	20783
	Ronald	20903
	Elias Perez	20783

1A-2



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Irvin Uises Flores	20903
10/17/13	Antonio Pesson Sales	20903
10/17/13	Gerson Manuel Castañeda	20783
10/17/13	Silvia M Gonzalez	90919
10/17/13	Ricoberto Cruz	20783
10/17/13	Marta Escamilla	20781
10/17/13	Hildesluis Apple	20012
10/19/13	Rosaura Gonzalez	20904



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Marino Gudiol Garcia	20783
10/17/2013	Guillermo Fuentes	20901
10/17/2013	Leisy Vargas	20902
10-17/2013	Anabel Rivas	20783

BASIC EDWIN A.



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Isaias Fuentes	20901
10/17/13	Manuel Alvarez	20903
10/17/13	Alfonso Lopez	20783
10/17/13	Beatriz Escobar	20901
10/17/13	Maria Castro	20912
10/17/13	Marily Campos	20783
10/17/13	Alvarez Marin	20783
10/17/13	Jessica Sorel	20917
10/17/13	Luis Gonzales	20901

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Mirna Baires	20710
10/17/13	CWELSON GONZALEZ	20783
10/17/13	Alfredo TAVETO	20912
10/17/13	Wiler Gando	20912
10/17/13	Jose A MENJINE	20743
10/17/13	CARMEN HERNANDEZ	20895
10/17/13	Jorge Estrella	20903
10/17/13	Gladis Traheto	20902
10/17/13	Maria E Hernandez Bañón	20903

Level Basic

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-2013	Angel Vazquez	20907
10-17-2013	Madina Wande	20783
10-17-2013	Isabel Castro	20903
10-17-13	Maria Martinez	20912
10/17/13	Carla Vazquez	20783
10/17/13	Gilmar Perez	20783
10/17/13	Novia mendoza	20904
10/17/2013	Santos Romero	20904
10/17/2013	Angelina Lopez	20901



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Ana Urias	20743
10/17/13	Andres Juarez	20782
9/13/09	Fredo Cruz	20852




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PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
	 <i>Hermilio Diaz</i>	
		
	<i>Sonia Encina</i>	
10-17-2013	<i>Alfredo Martinez</i>	20763
		
	<i>BAYRON VAIL</i>	

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Adya Perez	
10 17 13	[Signature]	
10 17 13	Salvador Ayala	
10 17 13	Elsy Amaya	20737
10 17 13	Carlos E Resino	
10 17 13	Carlos Morda	
10.14.15	Salvador Sator	20784

1A-5



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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Barbara Gibbs	20912
10-17-13	Verónica Lonto	20912
10-17-13	Leni Ramirez	20770
10-17-13	[illegible]	20782
10-17-13	Norma Chava	20706
10-17-13	Juan Romero	20912
10-17-13	Blanca Tobías	20783

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Marvin Antonio Amaya	20783
10/17/2013	José M Benitez	20900
10/17/2013	María M. Apolera	20705
10/17/2013	Luis O. Rodriguez	20903
10/17/13	María Rodriguez	20783
10/17/13	Marcos Ramirez G.	20783

18



PETITION

The International Corridor is home to residents representing over 150 countries and a vast array of minority-owned small businesses that compliment this diversity. The Purple line will serve a community whose riders will benefit from greater transit access. Despite the benefit of better transit, there are also deep concerns that the Purple Line will threaten this vibrant community by indirectly displacing them because of the lack of affordable housing, small business preservation tools, and a failure to commit to local jobs. We expressed similar concerns in our comments in 2009 when we submitted a similar petition to the draft environmental impact statement but there has been no response. The Final Environmental Impact Statement fails to provide a mitigation strategy that adequately addresses these concerns; therefore, we strongly urge MTA and all respective stakeholders to create a Purple Line Compact, a document that outlines the mitigation strategy to address the displacement concerns. Thank you.

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Nery Mejía	20912
10/17/13	Suzana Martinez	20902
10/17/13	Jorge Aquino	20783
10-17-13	ELY BRITO	20903

CA

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-2013	Jose O Blanco	20906
10-17-2013	Nelson O Gomez	20783
10-17-2013	Lizandro Morales	20783
10-17-2013	Carlos Alfaro	20902

AA

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Nidi Tenabe	20906
10/17/2013	Marise Jonty	20904

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Elizabeth Vásquez	20902
10-17-13	Samuel Gomez	20783
10-17-13	Jose Arjeto	20783
10-17-13	Yanori Carranza	20902
10-17-13	Jesús Tadeo	20702
10-17-13	Joe Milian	20788
10-17-13	Yony Orozco	20904
10-17-13	Martin Garcia	20783
10-17-13	Martin Brando	20902

5A



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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Jose Diaz	20903
10/17/13	Armando Coronado Perez	20901
10/17/13	Leda T. Garcia	20902
10/17/13	Macario Ortega	20783

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
17-10-013	Young Cabrera	20783
10-17-13	Volmont Jean	20783
10-18-13	Eulynne Matuge	20783

PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/16/2013	Rosa M. Flamenco	20853
10-17-2013	Rosa R. Tsusi	20901
10-17-2013	Daniel A. Gomez	20901
10-18-2013	Edon W. Orellana	20912

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Date/Fecha	Name/Nombre	Zip Code/Código
17-2013	Viola Gale	20895
10-17-13	AZUL POLO	20912
10-17-13	Irisa Rosales	20853
10-17-13	Luz Arina	20783
10-17-13	Idania Reyes	20906
10-17-13	Ernesto Saravia	20910
10-17-13	Roberto Bol	20910
10-17-13	Javier Euzman	20902

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Date/Fecha	Name/Nombre	Zip Code/Código
10-18-13	Jorge Berra	20784
10/18-13	BERNABE MATIASO	20903
10/18-13	Jemimah Muarenga	20784
10/18/13	Juan Reyes	20737
10-18-13	[Signature]	16243
10-18-13	MAURICIO MESTIA	20902
10-18-13	Helda Lopez Arduena	20012
10-18-13	Sandra Porton	20906
10-18-13	Adree Nobby	20832
10-18-13	Ma. Elena S.L.	20906

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Date/Fecha	Name/Nombre	Zip Code/Código
10/18/2013	SEAN WADDALE	209502
10/18/2013	HENRY JOAN CLAUDE	207820
10/18/2013	ARLAND L. TSOBGOU	20903
10/18/2013	SIDORE LIANEA	20783
10/18/2013	HENRY POH	20782
10/18/2013	ROBERT BUSINGRE	11
10/18/2013	Abolix Maudine	20919
10/18/13	Jose J. Ramirez	20903
10-18-13	Jose Turecius	
10-18-13	José Castañeda	

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Date/Fecha	Name/Nombre	Zip Code/Código
10/18/2013	Jacinta Nino	20850
10/18/2013	WILFRED MOKOKO	20912
10/18/2013	SIMON TANTO	20912
10-18-2013	SALOTUR SESAO	20185
10-18-13	FABIEN NSELEKAM	20783
10-18-13	DENIS TAFFOU	20011
10-18-13	PATRICK SIEME	20903
10-18-13	Johnson Teboh	20902
10-18-13	RAPHAEL TCHAPI	20923

Purple Line FEIS - RECORD #688 DETAIL

First Name : Brian
Last Name : Burns
Email Address : zin4@verizon.net

Submission Content/Notes : DON'T DESTROY THE PARK - The FEIS is flawed. For more than 20 years the Capital Crescent Trail has been enjoyed as a Park. The FEIS doesn't acknowledge the trail as an irreplaceable 20 acre natural resource. Shouldn't the Final Environmental Impact Statement recognize how invaluable parks are in people's lives?

C.3

E.5

Purple Line FEIS - RECORD #688 DETAIL

First Name : Brian
Last Name : Burns
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C.3

E.5

Purple Line FEIS - RECORD #689 DETAIL

First Name : Richard
Last Name : Albores
Business/Agency/Association Name : North Woodside-Montgomery Hills Citizens Association
Email Address : ricky.albores@gmail.com

Submission Content/Notes : *North Woodside-Montgomery Hills*

Citizens Association (NWMHCA)

*P.O. Box** 8022*

*Silver Spring**, Maryland 20910*

October 21, 2013

Maryland Transit Administration
Transit Development & Delivery
100 S. Charles Street
Tower Two, Suite 700
Baltimore, MD 21201

Re: Purple Line Comments- Final Environmental Impact Statement

Dear Federal Transit Administration and Maryland Transit Administration:

On behalf of the North Woodside-Montgomery Hills Citizens Association (NWMHCA), I respectfully submit these comments to the Maryland Purple Line Final Environmental Impact Statement (FEIS).

NWMHCA is a vibrant community, established in 1890 and home to more than 350 families at all life stages. We are bordered by Seminary Road to our north, Georgia Avenue to our east, Sixteenth Street extended to our south and the CSX tracks to our west. Within our boundaries, we also host Woodlin Elementary School, the Yeshiva of Greater Washington, Rinaldi Funeral Services and Genesis Healthcare Woodside Center.

We work hard to preserve our hometown charm amidst a blustering and confusing transportation system of roads that bisect and burden us with non-local motor vehicle and bus traffic; dangerous and busy pedestrian crossings along our borders; and the noisy and unattractive railway right-of-way operated by CSX. We have enjoyed the rebirth of the Silver Spring CBD, the completion of the Walter Reed Army Institute of Research, and the recent redevelopment of the National Park Seminary Property - at all times raising our voices to seek protection from the adverse traffic implications that these modifications have imposed on our residential community.

In General, NWMHCA continues to support the Purple Line project as an East-West light rail public transit option with a multi-use path (MUP) connecting the East and West segments of the Capital Crescent Trail. This is consistent with the NWMHCA 2003 resolution that called for minimizing adverse impacts to the NWMHCA community in the implementation of the Purple Line project.

With that resolution in mind, NWMHCA would like to express significant

D.2

concerns with the FEIS as it relates to the proposed reconstruction of the Talbot Avenue Bridge. As currently proposed, the Talbot Avenue bridge would

F.4

be reconstructed as a 40-foot wide bridge with two-way vehicle traffic and one lane of MUP. NWMHCA opposes this proposal. The proposal would increase motor vehicle cut-through traffic in the residential neighborhood and adversely affect the safety and quiet enjoyment of NWMHCA residents, especially those on Hanover Street and Grace Church Road which lead to and from the bridge. NWMHCA does not believe MTA has adequate and current traffic volume data for the bridge as currently configured and has not adequately analyzed the traffic burdens on the bridge. The FEIS also does not adequately analyze and discuss the traffic volumes or adverse impacts anticipated to occur when a reconstructed bridge allows two-way traffic and MUP usage.

Of the NWMHCA residents surveyed (55 homes, or approximately 15 percent), the majority have expressed a preference for building a new bridge that would maintain one lane of vehicular traffic (similar to the current operation of the bridge) and a one lane MUP. If MTA reconstructs the bridge as proposed, NWMHCA requests that:

- A) MTA conduct traffic studies to document current vehicular traffic volumes and adopt appropriate measures to minimize cut-through vehicular traffic;
- B) MTA include a ban of commercial truck and bus usage of the bridge; and
- C) MTA study and adopt all appropriate vehicular traffic mitigation measures to minimize cut-through vehicular traffic and promote safety (examples include speed cameras, traffic lights at the bridge, and volume-access restrictions).

Additionally, NWMHCA requests a noise abatement study be conducted for the portion of the Purple Line tracks that will abut our neighborhood along Luzerne Avenue, and implement any sound barriers necessary to address excessive noise from the construction and operation of the Purple Line.

Thank you for the opportunity. If you have any questions or concerns, please contact me at ricky.albores@gmail.com, or on 202-258-0429.

Sincerely,

/signed/

Ricky Albores, Member NWMHCA
Purple Line Talbot Bridge Subcommittee

cc: Governor O'Malley

Lt. Governor Brown

E.9

G.2

County Executive Ike Leggett

Montgomery County Council

Congresswoman Donna Edwards
Congressman Chris Van Hollen
Secretary James Smith

Bcc: NWMHCA list-serve

Purple Line FEIS - RECORD #690 DETAIL

First Name : Zorayda
Last Name : Moreira
Business/Agency/Association Name : CASA de Maryland
Email Address : zmoreira@casamd.org
Submission Content/Notes : *Zorayda Moreira-Smith*

Manager of Housing, Community and Economic Development

CASA de Maryland, Inc.

8151 15th Avenue

Langley Park, MD 20783

Phone: 240-491-5761

Fax: 301-408-4123

“*Tell me and I forget, teach me and I may remember, involve me and I learn*.”
- Benjamin Franklin

E.14

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Attachments : Petitions (1).pdf (11 mb)

PETITION

The International Corridor is home to residents representing over 150 countries and a vast array of minority-owned small businesses that compliment this diversity. The Purple line will serve a community whose riders will benefit from greater transit access. Despite the benefit of better transit, there are also deep concerns that the Purple Line will threaten this vibrant community by indirectly displacing them because of the lack of affordable housing, small business preservation tools, and a failure to commit to local jobs. We expressed similar concerns in our comments in 2009 when we submitted a similar petition to the draft environmental impact statement but there has been no response. The Final Environmental Impact Statement fails to provide a mitigation strategy that adequately addresses these concerns; therefore, we strongly urge MTA and all respective stakeholders to create a Purple Line Compact, a document that outlines the mitigation strategy to address the displacement concerns. Thank you.

El Corredor Internacional es el hogar de los residentes que representan a más de 150 países y pequeños negocios propiedad de minorías que complementan esta diversidad. La Línea Morada servirá a una comunidad cuyos corredores se beneficiarán de un mayor acceso de tránsito. A pesar de la ventaja de tener mejor tránsito, también existen profundas preocupaciones en el Corredor Internacional que la Línea Morada amenazara esta comunidad indirectamente con el desplazamiento a causa de la falta de vivienda bajo costo, herramientas para ayudar a los negocios pequeños y una falta de compromiso con el empleo local. Hemos expresado nuestra preocupación en nuestros comentarios en 2009 cuando presentamos una petición similar al proyecto de declaración de impacto ambiental. La Declaración de Impacto Ambiental Final no proporciona una estrategia de mitigación que es adecuada. Recomendamos que MTA y todos los respectivos grupos de interés la creación de un Compacto para la Línea Morada, un documento que describe la estrategia de mitigación para afrontar las preocupaciones de desplazamiento. Gracias.

Date/Fecha	Name/Nombre	Zip Code/Código
10/21/13	Flore Velozquez	20903
10/21/13	Edwin Orozco	20903
10/21/13	Sisnani Pineda	20903
10/21/13	Yenny Rodriguez	20903
10/21/13	Marik Flores	20903
10/21/13	Oscar Campos	20903
10/21/13	Miriam Garcia	20903
09 10/21/13	Oscar Mejia	20903
10/21/13	Eliaman Mejia	20903

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Date/Fecha	Name/Nombre	Zip Code/Código
10/21/13	Gilma Ruiz	20903
10/21/13	Dinora Ruiz	20903
10/21/13	Paz Bertios	20903
10/21/13	Eneidino Bernal	20903
10/21/13	Jessive Ruiz	20903
10/21/13	Manu de Campos	20903
10/21/13	Gladis Campos	20903
10/21/13	Sergio Romero	20903
10/21/13	CONCEPCIÓN LÓPEZ RAMOS.	20903

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Date/Fecha	Name/Nombre	Zip Code/Código
10/18/13	Alexander Rey	20903
10/18/13	Maria Villatoro	20903
10/18/13	Andrea Ramirez	20903
10/18/13	Miguel Angel Reyes	20783
10/18/13	Deborah Guine	20740
10/18/13	Luis O. Petano	20903
10/18/13	Soanna Zavala	20901
10/18/13	Suana Zavala	20901
10/18/13	Berthio Gutierrez	20903

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Date/Fecha	Name/Nombre	Zip Code/Código
10-18-13	PAULA BARROSO	20983
10-18-13	ELISBA VILLAFUENTE	20983
10/18/13	Isis SANDOVAL	20903
10/18/13	Jose SANDOVAL	20903
10/18/13	ARIANNA SANDOVAL	20903
10/18/13	Mayra RODRIGUEZ	20903
10/18/13	Norma REYES	20963
10/18/13	Maño REYES	20903
10/18/13	monica REYES	20903

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10-19-2013	Laura Pinto	20903
10-19-2013	Renny Guerra	20903
10-19-2013	Vanessa Bonilla	20903
Octobe 19	Carmen Bonilla	20903
Oct. 19	Vitor Bonilla	20903
10-19	David Cordero	20903
10-19	Olga Cordero	20903
10-19	Olga Manuel Ramos	20903
10-19	Cecibel Ramos	20903

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Date/Fecha	Name/Nombre	Zip Code/Código
10-19-13	Blanca Wintero	20903
10-19-13	Juan Salcedo	20903
10-19-13	Rosa Bercian	20903
Jan 10-19	Jaime Gonzalez	20903
20/29/13	Noehmy Cambara	20903
10-19-13	Carlos Hernandez	20903
Oct 19, 13	Luis Burgos	20903
Oct 19, 13	Yohanna Mante	20903
Oct. 19, 2013	Rosario Hernandez	20903

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October 18 2013	Lohel Garcia	20783
10-18-13	Lucia Hernandez	20783
10-18-13	Teresa Campos	20783
10-18-13	Jorge Chacon	20783
10-18-13	Juan Quintana	20783
10-18-13	Magdalena Bouilla	20783
10-18-13	Liliana Gonzalez	20783
10-18-13	Daka Dobson	20783
10-18-13	Jose Guevara	20783

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Date/Fecha	Name/Nombre	Zip Code/Código
9/19/10/21/13	Alvaro Cabrem	20901
10/21/13	Eva Rudes	20783
10/21/13	Maria Yolanda Candelas	20901
10/21/13	Abraham Reyes	20783
10/21/2013	Mirena Piccus	20765
10/21/2013	Alvaro Lopez	20901
10/21/2013	Berta Lopez	20901
10/21/2013	Ange Ndecky	20784
10/21/2013	Lisa Llanos-Ndecky	20784

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18-10-13	Paul Gaviolo	20783
10-18-13	Ana Quintanilla	20903
10-18-13	David Corvera	20903
10-18-13	Yoli Estrada	20903
10-21-2013	Edelisa Berríos	20901
10/21/2013	Bruno Lucas	20901
10/21/2013	Delia Aguilan	20903
10/21/13	Jaime Samabia	20901
10/21/13	Lucy Amaya	20901

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10/21/13	Juan Lopez	20783
10/21/13	Gleng Campos	20783
10/21/13	Rodney Herrera	20783
10/21/13	Miriam Moran	20783
10/21/13	Carmela Coronado	20783
10/21/13	Brenda Alonzo	20783
10/21/13	Juan Casal	20783
10/21/13	Candelaria Sarrlean	20783
10/21/13	Ameilka Perez	20783

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10/21/13	Alicia Silva	20783
10/21/13	Carlos Tobar	20783
10/21/13	Beatriz Manuel	20783
10/21/13	Javier Luis	20783
10/21/13	Javier Luna	20878
10/21/13	Ana Martinez	20901
10/21/13	Marg Ellsberg	20901
10/21/13	Michael Levi	20901
10/21/13	Lidia Rivas	20783

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Date/Fecha	Name/Nombre	Zip Code/Código
10/21/13	Clement Andrew	20783
10/21/13	Ana Argieta	20783
10/21/13	Brenda Akinnagbe	20901
10/21/13	Esther Akinnagbe	20901
10/21/13	Claudia Guñon	20901

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Date/Fecha	Name/Nombre	Zip Code/Código
October 17th, 2013	Antonio Mirancla	20783
October 17th 2013	Carlos Cabrera	20783
Nov-17th 2013	Emmanuel Gutte	20902
October, 17th 2013	Yeniz Barahena	20910

Level 2A #2



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Micaela M.	20706
10-17-13	ERNEST JEAN	20783
10-17-13	José Caballero	20783
10-17-13	Ludwin S.	20787
10-17-13	Victor Garcia	20787
10-17-13	Jose Ortega	20906

Level 2A #2



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
	Maidoruee Zhan Hernandez	
	Josay Castillo	
	Elmer Bonitez	
	Fatima Cortessi	
	Ana Carcamo	
	EUSTAVO MALDONADO	
	Elman Hernandez	
10/	Felipe Lopez	

2A-3



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/2013	Adolfo Rivas	20943
10/17/2013	Fernando Perez	20901

2A-3



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
	Mario Fuentes	20903
	Santiago Lopez	20783
	Crisma Rivera	20783
	Leo Soto	20782
10/17/13	Manuel Perez Decalix	20904

Letel JB



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Sando	20906
10-17-13	Friselda Diaz	20901
10-17-13	Alba K Lopez	20903
10-17-13	Laura Chavez	20903
10-17-13	Delia Rodriguez	20781
10-17-13	Selma Forner	20740
10-17-13	Oliverio Reina	20783
10-17-13	Glady's Bufierrez	20895

Cestel JB



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17 th / 2013	Reine - Mamaty	20901
9/17 th / 2013	José Aguilera	20902
9/17/2013	Samuel Miranda	20770
9/12/2013	Marita Coza	20734
9/12 / 2013	JoAnne Elbocana	20783

Level 2B



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Marcelo Vicente	20902
10/17/13	Melroy Flores	20901
10/22/13	Mahomed. Gubierrez	20785
10/17/12	Alfredo Gomez	20901

3A-1



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10-17-13	Anibal Gómez	20901
10-17-13	Martha Adel	20902

3A-1



PETITION

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Date/Fecha	Name/Nombre	Zip Code/Código
10/17/13	Cecilia B. Sorel	20912
10/17/13	Jose Roberto Santos	20901
10/17/13	Nelson Pineda	20904
10/17/13	Gabriela Blanco	

Purple Line FEIS - RECORD #691 DETAIL

First Name : Alan
Last Name : Parker
Email Address : alanjamiie1@hotmail.com
Submission Content/Notes : Good afternoon,

B.1

C.3

E.4

I grew up in Montgomery County, having moved there in 1971 at age of six. So much of it is already unrecognizable. I understand more people, more cars, more income. But at some point, to what end? To turn Bethesda into one more Tyson's Corner? Why? Please save the trail. It's value cannot be measured in dollars, but I assure you it has that value. I have spent many a lovely time on that trail. There are many policy issues that can be reversed, but not this. Please save the trail. Do developer dollars absolutely have to win, everything? Rockville Center looks like Reston Center which looks like Laurel and Columbia. Boo! Your grandchildren- and all of ours- will want to know why the trail was ruined (if it is to be). I can see justifying it in the name of projected revenue. Does it ever stop?

Thank you,

Alan Jamie Parker

Purple Line FEIS - RECORD #693 DETAIL

First Name : Zorayda
Last Name : Moreira
Business/Agency/Association Name : CASA de Maryland
Email Address : zmoreira@casamd.org
Submission Content/Notes : Thank you.

Zorayda Moreira-Smith

Manager of Housing, Community and Economic Development

CASA de Maryland, Inc.

8151 15th Avenue

Langley Park, MD 20783

Phone: 240-491-5761

Fax: 301-408-4123

“*Tell me and I forget, teach me and I may remember, involve me and I learn*.”

- Benjamin Franklin

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Attachments : Community's Purple Line FEIS comments 10.21.2013.pdf (321 kb)

October 21, 2013

Purple Line: FEIS Comment
Maryland Transit Administration
Transit Development & Delivery
100 S. Charles Street
Tower Two, Suite 700
Baltimore, MD 21201
FEIS@purplelinemd.com

cc: Governor Martin O'Malley
Lt. Governor Anthony Brown
County Executive Ike Leggett
County Executive Rushern Baker
Congressman Donna Edwards
Congressman Chris Van Hollen
Secretary Dominick Murray
Secretary James Smith
Secretary Leonard Howie III
Secretary Raymond Skinner

Re: Purple Line Comments- Final Environmental Impact Statement

Dear To Whom It May Concern:

We, the undersigned, respectfully submit these comments to the Maryland Purple Line Final Environmental Impact Statement (FEIS). In general, we support the Purple Line. We strongly believe that the Purple Line development, if managed successfully, presents opportunities beyond ridership, including economic empowerment through jobs and small business growth, a healthy and attractive environment, an increase in affordable housing, and strengthening the fabric of our communities. Mismanaged, we are concerned that the Purple Line development will threaten our unique International Corridor community through upward pressure on housing and small business rents. And we will lose a once-in-a-lifetime opportunity to utilize infrastructure development to permanently improve skills and income for low-wage workers. We strongly recommend and urge the Maryland Transit Administration (MTA), and all stakeholders to create a Purple Line Compact that will include mitigation strategies to offset the adverse impacts of the Purple Line development.

Impact on Existing Small Businesses

The FEIS recognizes small business concerns regarding the loss of business during construction¹ and rent increases but fails to provide a substantive description of how those impacts will be mitigated. Instead, the FEIS argues that post-construction, the Purple Line

¹ The FEIS recognizes that "small businesses in particular would have difficulty [during construction] withstanding the resulting loss of commerce," (FEIS at 4-164).

increase economic activity without explanation of how our vibrant community of minority-owned small businesses will survive the 5-year construction period. The FEIS mentions a Business Impact Minimization Plan (Plan) but does not provide details. We support MTA's intent to develop this Plan and we strongly encourage them to involve the community and incorporate the Plan into the Purple Line Compact.

Affordable Housing

The FEIS acknowledges the potential impact of the Purple Line on increased property value, changes in the availability and affordability of housing stock, and changes in neighborhood character. ² The FEIS argues that the MTA has worked to address these indirect effects through meetings with community members, community organizations, local elected officials, and agencies. These activities should continue and be strengthened. However, talking about the problem is not a plan for mitigation. Our organizations have concrete proposals to alleviate some of these concerns and believe that their adoption should be discussed through a Purple Line Compact and specific commitments toward mitigation made.

Pathways from Poverty Through Employment

The FEIS does not address the large need for job opportunities for residents of low income census tracts surrounding the alignment. There are ten zip codes within the project impact zone that contain census tracts with median incomes under \$40,000. All but one of these zip codes have an unemployment rate that is higher than the statewide average of 7.3%. Moreover, each of these low-income zip codes contains multiple census tracts with above average unemployment, and at least one census tract with high unemployment of at least 150% of the statewide average. By implementing a well-crafted training and employment strategy for the upcoming Purple Line, Maryland can build viable career pathways for underemployed local workers, maximizing the impact of its transit investment by linking it to human capital development. The FEIS makes no mention of this issue other than to assume with no factual analysis that the jobs will simply go to local communities. Again, we hope that specific inter-agency commitments on training and jobs will be included in a Purple Line Compact process.

Conclusion

Our organizations have met with and organized with directly impacted residents and small businesses in the International Corridor for years. Our priorities around small business preservation, anti-displacement housing policies and investment, and job development are well-known and have been expressed across dozens of MTA-hosted and county-hosted meetings. We were very disappointed to see such scant reflection of these concerns in the FEIS and hope that these concerns will be seriously considered and addressed by the Federal Transit Administration and the Maryland Transit Administration.

² FEIS at 4-166.

If you have any questions, please contact Zorayda Moreira-Smith at zmoreira@casamd.org. Thank you.

Sincerely,

Bedford Station, Victoria Station, and Newbury Square Apartments Tenants Coalition (Alicia Silva and Lidia Rivas, Tenant Leaders)

CASA de Maryland, Inc. (Gustavo Torres, Executive Director)

CHEER (Bruce Baker, Director)

Coalition for Smarter Growth (Cheryl Cort, Policy Director)

Iglesia Evangélica Mahanaim (Pastor Rosalio Garcia)

Iglesia Luterana La Sagrada Familia (Pastora Rosario Hernández)

International Academy of Football Club (Raúl Sosa, President)

Job Opportunities Task Force (Jason Perkins-Cole, Executive Director)

Langley Park Small Business Owner's Association (Jorge Sactic, President)

Latin American Youth Center/Maryland Youth Center (Luisa Montero, Director)

Long Branch Small Business Association (Carlos Perozo, President)

Long Branch Residents Council (Alvaro Cabrera and Flor Velasquez, Tenant Leaders)

Lyttonsville Community Civic Association (Charlotte Coffield, President)

Montgomery Housing Partnership (Robert Goldman, President)

Safe Silver Spring (Tony Hausner, Chair)

Shared Progress Collaborative (Paul Grenier, Community Economic Development Specialist)

Soccer League of Langley Park (Tobias Lopez, President)

St. Matthew's Episcopal Church (Father Vidal Rivas)

St. Miguel's Episcopal Church (Father Vidal Rival)

Templeton Knolls Civic Association (Alice Bishop, President)

Turner Memorial AME Church (Pastor William H. Lamar IV)

University Landing Apartments Tenants Association (Laura Pinto, Tenant Leader)

Individuals: Ann M. Collins, LSCW-C; Jean Cavanaugh; Justin W. Chappell; Terrill North; Tony Hausner; and Valerie Barr

Purple Line FEIS - RECORD #694 DETAIL

First Name : Zorayda
Last Name : Moreira
Business/Agency/Association Name : CASA de Maryland
Email Address : zmoreira@casamd.org
Submission Content/Notes : Attached are CASA's comments to the FEIS.

Thank you,
Zorayda

Zorayda Moreira-Smith

Manager of Housing, Community and Economic Development

CASA de Maryland, Inc.

8151 15th Avenue

Langley Park, MD 20783

Phone: 240-491-5761

Fax: 301-408-4123

“*Tell me and I forget, teach me and I may remember, involve me and I learn*.”

- Benjamin Franklin

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Attachments : CASA de Maryland's Purple Line FEIS Comments (signed) 10.21.2013.pdf (3 mb)
CASA de Maryland's Purple Line FEIS Comments 10.21.2013.pdf (274 kb)

October 21, 2013

Purple Line: FEIS Comment
Maryland Transit Administration
Transit Development & Delivery
100 S. Charles Street
Tower Two, Suite 700
Baltimore, MD 21201
FEIS@purplelinemd.com

cc: Governor Martin O'Malley
Lt. Governor Anthony Brown
County Executive Ike Leggett
County Executive Rushern Baker
Congressman Donna Edwards
Congressman Chris Van Hollen
Secretary Dominick Murray
Secretary John Smith
Secretary Leonard Howie III
Secretary Raymond Skinner

Re: Purple Line Comments- Final Environmental Impact Statement

To Whom It May Concern:

CASA de Maryland, Inc. ("CASA") respectfully submits these comments on the Maryland Purple Line Final Environmental Impact Statement ("FEIS").

CASA is Maryland's largest non-profit organization serving the immigrant community. We provide legal, social services, adult education, job training and placement assistance, and leadership development to our 43,000 members; day laborers, low income tenants, and domestic workers, among others. CASA is committed to the International Corridor. The International Corridor is home to an environmental justice community¹, minority and low-income populations². Its' residents represent over 150 countries and a vast array of minority-owned small businesses that compliment this diversity. CASA has seven centers, four of which are located on the proposed Purple Line corridor. Our headquarters sits just a block off the section of

¹ Environmental justice communities are commonly identified as those where residents are predominantly minorities or low-income; where residents have been excluded from the environmental policy setting or decision-making process; where they are subject to a disproportionate impact from one or more environmental hazards; and where residents experience disparate implementation of environmental regulations, requirements, practices and activities in their communities.

² The International Corridor meets MTA's definition of minority and low-income populations because over 50 percent of the population is minority and more than 16 percent households are below poverty level.



University Boulevard lying between the proposed Riggs Road and New Hampshire Avenue stops.

A.1

CASA supports the Purple Line because we strongly believe that the Purple Line has the potential to create opportunities for success beyond ridership. These opportunities include economic empowerment through the creation of jobs and strengthened small businesses, a healthy and attractive environment, and an increase in affordable housing. Mismanaged, we are concerned that the Purple Line development will threaten our unique International Corridor community through upward pressure on housing and small business rents. Without affordable housing and manageable commercial rents, the very individuals the Purple Line is meant to service will be forced from the area and denied the benefits of the transit investment.

These concerns have been voiced numerous times across years at Maryland Transit Administration (“MTA”) meetings, planning board meetings and hearings, county council meetings and hearings, and more. To date, these concerns have not been addressed and the FEIS brings us no closer. The Purple Line has a greater chance of success if it is designed and built in partnership with the communities, especially the most vulnerable, which lie along its right of way. We propose that government stakeholders work in partnership with impacted communities along the Purple Line to ensure that its construction builds families rather than displace them. We strongly urge MTA create a Purple Line Compact that will detail the solutions to the concerns that have been expressed. In Baltimore, the City, MDOT, MTA, and over 100 signatories came together to lift up a set of commitments to ensure that Red Line construction would garner critical benefits for its adjacent communities and avert the challenges that its construction may cause. We propose mirroring that success for Purple Line communities.

There are five critical manners in which the FEIS fails to adequately analyze and propose solutions for the challenges of Purple Line construction, particularly for minority and low-income communities.

1. The FEIS Fails to Discuss the Indirect Impacts on Low Income and Minority Renters in the Purple Line Corridor

CASA is concerned that the long-term, low income and minority populations that reside in the International Corridor will be forced from the area. The FEIS acknowledges that “potential indirect effects to environmental justice populations include increased business expenses (e.g., rents) from increased property values.” (FEIS at 7-14). The “benefit” of higher property values will not accrue to them, but rather work as a detriment to their ability to sustain their homes and places of business. As a result, the negative impact of Purple Line-spurred land use and development will be felt most acutely by the low income and minority populations who have made the International Corridor the culturally diverse place that it is today. The benefits associated with the Purple Line should not be reserved only for the wealthy who can afford to remain in an area when rents rise, but to all of those that make up the neighboring community that the Purple Line is meant to benefit. As the project is currently planned, there is inadequate mitigation in place in order to protect these families, individuals and small businesses from such

displacement that would prevent them from benefitting from the Purple Line. As such, the FEIS fails to take into account these negative effects in its cost-benefit analysis of the project.

CASA recognizes that the Purple Line will provide improved access to employment, educational, recreational, shopping and cultural opportunities. We support these benefits, each of which is important to the transit-dependent populations we represent. However, we strongly disagree with the FEIS' conclusion that these benefits "would accrue to a higher degree to minority and low-income populations due to their higher reliance on transit." (FEIS at 4-156). If minority and low income individuals are driven from the area due to increased property taxes and raised rents (and studies indicate increased property values in close proximity to transit stations), these benefits would not accrue to minority and low income populations at all, let alone to a higher degree. Basic protections against the harmful consequences that a project of this magnitude has on the low income population and the community cohesion must be ensured and have been ignored in the FEIS.

2. The Purple Line will Disparately Impact Low-Income and Minority Communities in the Purple Line Corridor

E.14

The FEIS wrongly assumes that although "sixty-nine percent of the block groups in the corridor are in environmental justice areas," this does not raise an environmental justice concern because "the adverse effects of the project are distributed propositionally between environmental justice and non-environmental justice areas." (FEIS at 4-168). This analysis is flawed in at least two ways. First, it fails to address whether the project could have been redesigned to travel through an area with a smaller low-income community. Considering only whether low-income and other communities within an artificially-selected site plan are affected in the same manner allows the FEIS to ignore an important aspect of the problem—namely, whether an alternative project location would have had a proportionally smaller impact on low-income and minority communities. Second, the FEIS ignores that the same impacts can affect low-income and high-income communities differently. Naturally, a rise in real estate value could be expected to harm a low-income community consisting primarily of renters while simultaneously benefitting a high-income community that consists primarily of home owners. Yet the FEIS simply states that the impacts of the project will be felt evenly across the project area, and fails to consider how those impacts might affect differently-situated communities.

We support infrastructure investment in underserved communities when the investment is planned properly, however, we will not support when the infrastructure investment is intended to economically and racially alter the neighborhood in which it lays. Price-driven displacement acknowledged as a possibility in the FEIS would be negligible if the Purple Line were planned for a wealthier area where the residents would be able to absorb such price increases. And in the proposed alignment, low-income and minority residents will be more disparately impacted in comparison to neighbors that are not low income. The disparate impact the low-income and minority community will suffer must be mitigated. The FEIS provides no mitigation strategies.



3. The FEIS Fails to Adequately Discuss the Direct Construction Impacts on Low Income and Minority Neighborhoods

The FEIS fails to provide a substantive analysis of the adverse impact that construction will have on small businesses located on the Purple Line corridor despite conceding that construction of the Purple Line will impact neighborhood quality along the corridor for a period up to five years. Construction will have negative impacts on some businesses, including loss of parking, difficulty accessing businesses, and disruption to deliveries. As the FEIS acknowledges, “[s]mall businesses in particular would have difficulty withstanding the resulting loss of commerce.” (FEIS at 4-164).

Despite acknowledging adverse impact, the FEIS lacks a complete analysis of that impact and how it will be mitigated. First, according to the FEIS, the adverse impact of the construction will be offset, at least in part, by the increased economic activity that the completed Purple Line will bring to the area – a new customer base and a larger overall customer market. However, that assumes that small businesses will still be around after five years of construction chaos to experience the offsetting benefits. Second, the FEIS fails to appropriately recognize and fully analyze the diminution of business revenue that will result during the construction of the Purple Line or the ability of small and minority business owners to withstand the impact to their businesses. Further consideration and additional mitigation of the construction impacts to small and minority owned business is necessary³.

E.4 Despite problems with its analysis, CASA supports the MTA’s intent to develop a Business Impact Minimization Plan (“Plan”). We strongly urge MTA to develop the Business Impact Minimization Plan in partnership with the community to ensure it is effective. We also encourage MTA to include the Business Impact Minimization Plan within the Purple Line Compact. The FEIS lists practices that *could* be included in the Plan. This language is not strong enough and does not commit to creating a plan with these practices. We believe that the following practices not only *could* be included, but *must* be included in order to help small and minority owned businesses survive the Purple Line construction:

- Maintaining Spanish-speaking outreach staff and a 24/7 construction hotline (in English and Spanish);

³ By way of example, the Central Corridor Light Rail Project between Minneapolis and Saint Paul, Minnesota involved the implementation of a wide range of mitigation measures to reduce the impact of construction on small businesses. Mitigation measures included: a construction access plan and contractor incentive program, special signage during construction, parking assistance programs, and business assistance programs. The business assistance program included a business support fund which provided no-interest forgivable loans in amounts up to \$20,000 to for-profit retail-oriented small businesses in the corridor that had experienced a decline in revenue due to the construction of the light rail. The loans could be used for basic business expenses, including payroll, inventory, rent, mortgage payments, utilities, taxes, marketing, and insurance. Similar mitigation measures are needed here.

- Ensuring access to businesses during construction for customers and deliveries;
- Posting sufficient, and sufficiently clear, directional signage, *translated where appropriate*;
- Developing “Open for Business” marketing and advertising tools for use during construction, *translated where appropriate*;
- Developing marketing and advertising tools for use after construction
- Promoting local businesses through a “Buy-Local” Campaign during and after construction;
- Fostering communication between the project outreach team and local businesses and local support and advocacy groups;
- Providing no-interest forgivable loans be provided; and
- Providing technical assistance to local small business owners.

Moving forward, development of the Business Impact Mitigation Plan should directly involve small and minority owned businesses and local groups. In this regard, CASA urges continued outreach to and engagement of Spanish-speaking business owners. Finally, MTA should continue to identify support services and resources available for small businesses *and* inform small businesses and local community groups of their availability.

4. Factual Inaccuracies in the FEIS

Because we are so concerned about displacement of minority-owned small businesses and low-income and minority communities, it is critical to note the many ways in which the FEIS has stated factual inaccuracies to obviate these specific direct and indirect impacts.

- MTA has *not* discussed any concerns regarding the preservation of affordable and low-income housing with Montgomery and Prince George’s Counties. (FEIS at 4-166). Instead, MTA has resisted acknowledging affordable housing as an issue that they should be addressing.
- MTA has *not* worked with the counties and advocacy groups to support the engagement of local elected officials regarding affordable housing and increased commercial rents resulting from increased property values as the project moves forward. (FEIS at 4-167). While MTA has attended meetings held by other parties including county officials and our organization, it has never meaningfully contributed to the conversation.
- The interim developments identified in the Sector Plan as candidates for redevelopment *are* in fact predicated upon construction of the Purple Line. (FEIS at 7-13). The Long Branch Sector Plan was initiated because of the Purple Line. The Sector Plan is centered on the Purple Line, “The Long Branch Sector Plan envisions a mixed-use, pedestrian-friendly, multi-cultural community that is served by the Proposed Purple Line. The Long

Branch Sector Plan is one in a series of land use plans for Purple Line station in Montgomery County.” (Long Branch Sector Plan, pg. 5)⁴

- The Montgomery County Council stopped the up-zoning of the residential areas during phase two because it recognized the impact on housing. (FEIS at 7-13).
- The Purple Line *will* be the primary driver for the social and economic change in Langley Park and Long Branch. (FEIS at 7-17).
- MTA has not supported the engagement of local elected officials regarding land use changes such as gentrification, nor has it worked with advocacy groups to engage local officials around these issues. (FEIS at 7-17). Instead, MTA has resisted acknowledging gentrification as a legitimate concern.
- MTA has *not* engaged small businesses in the Purple Line corridor in identifying opportunities and resources for technical assistance to businesses” (FEIS 7-18). MTA has merely handed out flyers regarding meetings, but has not made a good-faith attempt to engage the small businesses. The MTA has meaningfully engaged the property owners, not their commercial tenants.
- MTA is *not* “working with the counties, as well as residents and business leaders, in planning a future vision for communities in the Purple Line corridor and in developing strategies to build diverse and prosperous neighborhoods.” (FEIS 7-23). Indeed, MTA has to date refused our requests to join with the Counties in a meeting to lay out mitigation plans.

5. The FEIS Fails to Adequately Discuss Alternatives

Finally, the FEIS contains a legally-inadequate discussion of alternatives. The FEIS itself recognizes that there are a number of reasonable alternatives to the selected course of action, but explains that CEQ guidance does not require the state to present a large number of reasonable but redundant alternatives. The FEIS, however, does not include an analysis of any reasonable alternatives; it compares the selected alternative only to a “no action.” The “no action” alternative is not reasonable, because it plainly does not achieve the project’s purpose and need. The result is that the FEIS, while quite lengthy, contains no comparison at all between the selected alternative and any alternative that could address the project’s purpose, despite the FEIS’ own disclosure that such alternatives exist. CEQ guidance permitting the state to eliminate redundant alternatives in the scoping and draft stages cannot be relied on to justify comparing the selected alternative to no reasonable alternative.

In conclusion, MTA must increase its efforts to work with the affected county governments along the Purple Line corridor and with advocacy groups to promote the engagement of local

⁴

http://www.montgomeryplanning.org/community/longbranch/documents/LB_PH_draft_20121228_web.pdf



elected officials in developing policies to mitigate land use changes such as gentrification. Affordable housing and rents are crucial to maintaining the character of the corridor and allowing the benefits of the Purple Line to inure to the entire community—including the low income and immigrant populations who currently live there.

CASA supports the Purple Line but we also have deep concerns. To address these concerns, we strongly urge you to create a Purple Line Compact. If you have questions, contact Zorayda Moreira-Smith at zmoreira@casamd.org or 240-491-5761.

Sincerely,

A handwritten signature in black ink, appearing to read "Zorayda Moreira-Smith".

Zorayda Moreira-Smith
Manager of Housing, Community, and Economic Development



Purple Line FEIS - RECORD #695 DETAIL

First Name : Frank
Last Name : Slazer
Email Address : digaslaze@mac.com

Submission Content/Notes : As a bicycle commuter, I highly value the natural environment provided by the trail - an environment that will be destroyed by the sound of moving trains and the concrete, catenary lines and fencing required to construct the Purple Line. Bicycle commuting is becoming ever more popular and someday, as in many European countries, it may prove a popular option for a significant portion of our population. By building the Purple Line we will be destroying a vibrant, green transit system that also serves a wide range of users - dog walkers, children going to school, or people who are just out for a walk in a park like setting. Parks are important too - scrap this ill thought out plan, finish the Capital Crescent trail and encourage even more people to use the greenest and healthiest transit system of all - bicycles!

A.2

C.3

D.3

Purple Line FEIS - RECORD #696 DETAIL

First Name : Paul
Last Name : Basken
Email Address : paul@basken.com

Submission Content/Notes : Dear MTA:

I am writing to express my full support for the Purple Line project and any necessary accompanying work to complete the Capital Crescent Trail between Bethesda and Silver Spring and beyond.

A.1

The CCT must be completed as part of this project as a paved, grade-separated, safe connection between downtown Bethesda and downtown Silver Spring and beyond. This should be done regardless the details of the alignment and the ownership of the necessary right-of-way, and the FEIS should more clearly state that MTA will work with MCDOT and necessary stakeholders to ensure that the trail is built as promised.

C.3

While I support the Purple Line as a means of providing alternatives to the use of single occupancy vehicles for east-west transportation in the region, the completion of the CCT as a viable bicycling connection is critical.

Please see the article copied below, from The Boston Globe, making clear the type of infrastructure we could aspire to emulate, to give people safe and healthy and environmentally wise alternatives to a future dominated by single-passenger car traffic.

Thank you,
Paul Basken (202-210-3071)

The Boston Globe

September 22, 2013 Sunday

A cyclist's mecca, with lessons for our town;

By innovating ways for cars and bikes to share the road, the Dutch have set the safety standard.

BYLINE: By Martine Powers, Globe Staff

SECTION: NEWS; Metro; Pg. A,1,22

HOUTEN, the Netherlands -- The intersection at De Koppeling Street is the kind of sight that might render a Bostonian speechless.

It's a double-decker roundabout.

The top level functions like a normal rotary, cars entering and leaving from four directions. That bit of controlled chaos New Englanders know

well.

But on a level just below the cars, there's another rotary, this one is just for bikes. As cars flow through the circle overhead, a steady stream of businessmen and moms and 12-year-olds wend their way through the intersection on their bicycles, safe, separated from cars, and undisturbed.

It was enough to draw stares from four visiting Northeastern University civil engineering students who gawked from a grassy shoulder, taking photos on their iPads of this gleaming vision from a bicyclist's Oz.

"This," howled Andrew Brunn, a burly 22-year-old engineering student grinning like a kid at Disneyland, "is totally crazy!"

To the average American, that's exactly how Dutch bicycle traffic seems. This is a place with more bikes than people, where about 26 percent of commuting trips are taken by bicycle, where toddlers and 85-year-olds ride happily in traffic, and where the likelihood of getting killed on a bike is among the lowest in the world, about five times less than the United States.

Almost every major street features separated bike lanes, bike-specific traffic lights, bike highways, and yield signs that, together, deliver one message: The bicycle is king.

It's the kind of European fantasy that sure as heck would never work in Boston.

Except, it might.

As local transportation officials and engineers work to improve safety for Boston's cyclists, they're starting to realize that the things we think make Boston bad for bikes -- cramped streets, crowded roadways, a desperate need for parking spots that leaves little room for bike lanes -- are exactly the factors that made the Dutch bicycle revolution possible half a century ago.

In fact, politicians, government leaders, and urban planners in Boston are increasingly looking to the Netherlands to figure out how to improve bike safety, and with it, bike usage, at home.

Largely, American planners inspired by the Dutch experience have taken an "if you build it, they will come" approach: If American cities invest the money to redesign their roads, transportation experts say, children, senior citizens, and men and women in suits will try out cycling.

But the Dutch have another lesson to share: Better bicycle infrastructure isn't enough. You need better cyclists, too, and more bike-aware motorists. Universal in-school bicycle education guarantees that every Dutch child can comfortably ride in traffic. By the time they get their drivers' license, they've used bicycles as their primary form of transportation for years -- and that habit continues into adulthood.

Rob van der Bijl, an urban planner in Amsterdam, said it's a common assumption: "Well, there are a lot of amenities, infrastructure, et cetera for bicycles -- so, hence, bicycles are successful," he said. But he argues that in reality, the opposite is true: "The existence of all these facilities and infrastructure are the result of the success, not the cause of the success."

In short, the answer to replicating the Dutch bicycling success in America might be a lot more complicated than building better bike lanes.

"In one word," van der Bijl said, "I would say it's a matter of culture."

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Living in bicycling nirvana leads many people -- especially the young Dutch who have known nothing else -- to believe it has been always been this way.

Far from it. In 1967, Amsterdam's chief inspector of traffic police had this to say about the state of cycling safety in his country: "Cycling," he declared to a national newspaper, "is tantamount to attempting suicide."

For decades, here as everywhere, the car reigned. It was only after years of political protest about pedestrian and cyclist deaths, and a climax of concerns about oil dependency, that the Dutch changed their ways.

Bike-riding had long been a mainstay of Dutch society, but attitudes shifted as the economic rebound that followed the conclusion of World War II brought on new cultural cravings. Wealth and babies boomed. As Dutch families moved to the suburbs, cars became less a luxury and more a middle-class necessity.

Highways were built, sidewalks narrowed, and room for bicycles was eliminated. Politicians suggested filling in the city's famed canals to make room for more parking spots.

And as driving increased, so did collisions with pedestrians and bike riders.

In 1950, just over 1,000 Dutch cyclists and pedestrians were killed in traffic accidents. By 1973, that number was about 3,250 -- many of them children. Parents, especially, were fed up.

"STOP THE CHILD MURDER," read signs held up by protesters who poured into the streets. On one of Amsterdam's most congested thoroughfares, hundreds laid down in the street next to their bicycles.

Then, in response to the 1973 oil crisis in the Middle East, Amsterdam mandated car-free Sundays to curb oil consumption -- and to their surprise, people liked it.

It was so popular, many towns closed their city centers to car traffic permanently. Soon, car lanes were narrowed to introduce separated lanes for bicycles.

And just like that, the bicycle was back in business.

"All I saw was bikes, bikes, bikes everywhere," said Peter Furth, a civil engineering professor at Northeastern University, recalling a visit to Amsterdam in the early 1990s. "That's when I said, 'Wow, I've got to find a way to live here.' "

Or somehow take what he was seeing home.

Furth, 57 -- balding, bearded, and bespectacled -- is the kind of civil engineering wonk who makes exclamations like "this intersection will make you drool."

Since that first trip to Amsterdam, he's been studying Dutch bicycle infrastructure, dividing his time between Boston and the Netherlands, and figuring out what elements of street design have led residents to ride

in droves.

Now, he brings a Northeastern civil engineering class here each year with the goal of bringing those answers back to Boston.

"Many people cannot see themselves benefiting from riding bikes," Furth said. "But once you come here and you see this, you just say, 'Why can't we have this at home?'"

Seeing is believing, he says. By changing the street design in a city, he believes, you will change how people live their lives. Bostonians who thought cycling was outside their depth -- old people, children, professionals, commuters from the suburbs -- will see how bikes can be integrated into their lives: grocery shopping, ferrying children to soccer practice, taking business lunches.

"For the first time, there are a lot of normal people who are showing an interest in cycling. It's not that they've changed their minds so much, but now they see it's possible and they want to be protected from cars."

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Rule number one of Dutch cycling: If you want regular people to ride bikes, you've got to separate them from the cars.

That's according to Jeffrey Rosenblum, transportation planner for the city of Cambridge who, along with Furth, is co-teaching the Northeastern class.

He explains: For years in the United States, bike lanes -- a strip of paint suggesting a delineation between cars and bikes -- have been the gold standard of bike infrastructure.

But Rosenblum sees bike lanes as just the start.

"Even if you feel 100 percent confident and comfortable riding in traffic, you end up spending 80 percent of your mental space paying attention to the act of cycling around, and therefore you don't have as much mental space just enjoying the experience," Rosenblum said. "In the Netherlands, you feel like you can daydream a little and look around, because you're not spending all of your energy looking for what's coming around the corner."

"Bike lanes relieve that concern a little bit," Rosenblum said. "But having separated bike facilities relieves that mental stress a lot."

Enter cycle tracks, a Dutch staple. Cycle tracks are dedicated lanes physically separated from cars. The barrier can be a curb or semipermanent plastic posts, or even potted plants.

Paula Overvoorde, 71, takes her bicycle most days to pick up groceries at a local market. A prim woman with pearl earrings, she packed cheese, milk, a sack of potatoes, lettuce, tomatoes, and a long loaf of bread into the carrier attached to the back of her bike. With cycle tracks spanning the 2-mile route from her home to the grocery store, she rarely rides alongside cars.

"It's easy to get here on bike," Overvoorde said. "Driving is too much of a hassle."

Some Dutch cycle tracks are also built at the same level as the sidewalk, separated from traffic by the curb. For cyclists, being closer to pedestrians makes for a more enjoyable ride: They don't feel that they need to race to keep up with cars speeding by.

And according to Constable Tommy Hamelink, head of the Hague Police's bicycle unit, drivers like the cycle tracks, too: They prevent cyclists from unexpectedly weaving into a car's lane.

"That is the biggest advantage we have," said Hamelink. "If possible, keep things apart."

With 21,000 miles of separated bike facilities in a country a little larger than Massachusetts and Connecticut combined, the cyclist demographic looks different: Instead of solitary road warriors streaking down a bike lane, you see couples holding hands while cycling side-by-side. Parents riding next to their children, a hand on the kid's back to guide them along. Moms riding -bakfiets, or "box bicycles" -- bikes with a wagon attached to the front -- with their kids snoozing inside.

Rosenblum and his family -- all staying in the Netherlands for the duration of the class -- found it exhilarating.

The family rides often when at home in Cambridge, but it's always

stressful.

"When I take the kids somewhere on the bike, I always have to think very carefully and strategically about what route I'm going to take, because there are so many routes I want to avoid," said Rosenblum's wife, Jessica Kuh.

"But [in the Netherlands], no matter what route you take, it's a good route," she continued. "I didn't have that sense of being constrained by fear at all. . . . It was like an amazing sense of, the whole city is completely open to you."

There are other ways, Rosenblum says, that Dutch transportation officials make roads safer for bicycles: lower city speed limits for cars; encouraging cyclists to use less-congested roads that run parallel to major car thoroughfares; and establishing "bike boulevards" that give right-of-way to bicycles.

When it's not possible to completely separate the bike track from the cars, traffic engineers try to at least separate cars and bikes as they cross an intersection. Placing small islands in each corner creates a buffer between cars and bicycles at traffic stops; the increased space provides a driver turning right more time to notice, and brake for, a bike going straight through the intersection.

Additionally, Rosenblum said, there's a way to crack down on the biggest complaint among Boston drivers: Cyclists who ignore red lights. Bike-specific traffic lights are common. And at intersections with these bicycle-shaped signals, something happens in Amsterdam that rarely occurs in Boston: Cyclists stop and wait.

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Houten, a town with about 49,000 people, has rock star status in international transportation engineering circles.

"If the Netherlands is heaven for bicycles," Furth announces, "then Houten is the heaven of heaven."

The city has had huge success with bikes, even for the Netherlands -- more than half of all trips are taken by bicycle or on foot. All high-speed car traffic is confined to two converging ring roads that form a figure 8 around the city. Speed limits are kept low on residential roads. Narrow streets with few connections mean that bikes are the only way to travel

quickly and reliably through the center of town.

And on most streets, a sign alerts motorists that they're allowed to travel there, but mustn't go faster than any of the surrounding bicycles: "Bike street," the sign says. "The car is the guest."

Experts say the town's enthusiastic embrace of cycling is the result of the government pouring so much money into infrastructure. Last year, they spent a rate of about \$42 per person to maintain and improve bike facilities.

It's a cut above Amsterdam, which spends about \$39 per resident per year, or the Hague, where it's at least \$27.

And how much does Boston spend? \$1.92 per person. Cambridge, Somerville, and Brookline aren't much better.

Of course, the Netherlands has a whole lot more money to throw at bike engineering. Costly urban ills we take for granted are rarities -- the country's homicide rate is 10 times lower than that of Boston. In Houten, the city's transportation planner jokes, the town's three biggest problems are speeding mopeds, uncollected dog poop, and loitering teenagers.

The low spending levels in Boston frustrates Furth. Key intersections in Allston, the Back Bay, and elsewhere could be so much safer if the investment was made to improve them.

He also believes Boston's street designers would benefit by emulating the innovative spirit of the Dutch. Near the western town of Scheveningen, transportation officials have even experimented with paving gentle asphalt waves in the road to slow speeding cars without impeding bicycles.

It wasn't a cheap project, and as it turns out, it's not working well -- cars continue to speed, Furth said. But the Dutch are OK with that kind of trial and error. "This is an example of this attitude of, 'try it out, see if it works,'" Furth said. "If it doesn't work, let's try something else."

Jesse Boudart of Portland State University, a teaching assistant on the Northeastern trip, says American engineers too often feel hemmed in by their design handbooks -- the bibles of the civil engineering world, which provide a menu of options engineers can use when redesigning streets. But one of the most widely used American manuals has been notoriously slow to warm to new bike facility options. Simple bike lanes,

in fact, only made the book last year.

Cycle tracks, bicycle corner islands, bike-specific traffic signals -- none are included.

"Engineers that go out on a limb . . . that's where you can get sued. That's a big problem for innovation," Boudart said.

Fresh thinking comes easier in the Netherlands, said Jan Nederveen, a city planner and transportation expert for the city of Delft. There are handbooks, to be sure, but also a spirit of flexibility.

"We like to experiment in Delft," he said.

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Peter van Rijn, a Rotterdam University engineer, standing before the Northeastern students, wanted to make sure they all got one crucial, contrarian-sounding point.

The key to bicycle safety, he said, had little to do with the design of the streets.

"Where does it start? I always say traffic education," van Rijn said. "It starts at schools -- primary school, elementary school . . . it's a matter of learning how you should act or ride or drive in traffic."

The Netherlands is a nation of expert bike riders, where children learn not just how to ride a bike, but how to ride a bike in a traffic system alongside cars, pedestrians, and public transit.

Esther Saraber, a 37-year-old consultant living in Delft, bikes her three sons to school every morning. Up until recently, she carried her youngest in a box bicycle, the ones with the wagon in front, known as the minivan of the bike world.

But Saraber's son turned 4 recently, and though he enjoyed the view from the comfy carrier, she put her foot down: He needed to ride to school on his own bike.

"He had no choice. We made him. I did the same when I was a child," Saraber said. "The sooner they learn to be a part of traffic, the better they're going to be."

Sure, she said, she and her family enjoy cycling. But the enjoyment, she said, is secondary; because the bicycle is a primary mode of transportation, it's a necessity that her child learn to bike safely.

"It's recreation for you all in America," Saraber said. "For us, it's a way of life."

Heliantje Kuster, who has taught at Delft's Basisschool De Ark, an elementary school, for more than 30 years, says that bike training is a fundamental part of the school experience. In the playground, a miniature bike rack holds dozens of tiny bicycles that the children have used to get to school alongside their parents. Inside the classroom, posters advertise bike riding and bike safety. When the school goes on field trips, they go on bikes -- riding down a cycle track in a large group, decked out in matching highlighter-colored vests.

What they learn in school is not just how to bike, but also how to participate in traffic, Kuster says.

And then there's the big milestone: The bike diploma.

For most, the rite of passage comes at about 12 years old. First there's a written exam, in which students must answer multiple-choice questions on the rules of the road. Then there's the practical portion: The children take to the roads, signaling their turns and stopping for cars as parents and teachers look on, evaluating their performance.

After they pass, parents and teachers allow them to travel to and from school on a bike without adult supervision -- total freedom.

Kuster says she worries about the few children who are dropped off to school in cars. They don't get the ingrained sense of how to navigate in traffic that comes with riding to school every day in a carrier on the front or back of their parents' bicycles.

That's why school instruction is so important, she said -- it ensures that cycling remains a mode of transportation for everyone.

And it's a skill that transfers to driving. Interactions between drivers and cyclists are less fraught with hostility largely because every motorist on the road knows what it's like to ride a bike in traffic.

Driver's license exams, too, are part of the equation. Questions on the written exam are geared toward knowing how to interact with a bicycle. In the practical exam, drivers invariably cross paths with bikes.

The last task of the exam is opening the driver's side door. Drivers are required in the exam to use their right hand to open their door, which forces them to turn their torso. That makes it more likely they will look over their shoulder to check for oncoming cyclists who could get doored. Fail that part of the exam, and you could very well fail the whole thing.

John Kartodikromo, who emigrated from Indonesia when he was a teenager, now works as a valet attendant in a Delft bicycle parking lot.

The 35-year-old didn't grow up riding bikes and missed out on in-school lessons as a child, but being surrounded by so many seasoned cyclists led him to adopt cycling as his primary mode of transportation.

"Everybody has a bicycle, so I ride a bicycle, too," Kartodikromo said. "That's just Holland -- it's a bicycle culture."

o o o

>From the podium of Houten's city council chambers, it would have been easy for urban planner André Botermans to declare to the Northeastern students in the audience that his city's "bike heaven" reputation is a uniquely Dutch success.

But he insisted that Houten isn't all that different from the United States. Most Dutch families still own cars -- relying on bikes for short trips and cars for longer distances -- and he's OK with that.

"In real life, people have cars and they need it to go from one place to another -- and that you can't expect them to go without it," even in the Netherlands, he said. "It's impossible to turn back the clock."

That's what makes the Netherlands experience relevant to American cities. By focusing on both street design and education, Botermans said, he thinks Americans can, and will, move toward a more bicycle-centered

culture.

And just as in the Netherlands, he said, that shift -- both in infrastructure and in cultural sensibility -- will be gradual.

"It's going to take maybe another 50 or 100 years," Botermans told the students, "for you all in the US to think bike rather than think car."

After returning to the United States in August, Rosenblum said he's felt equal parts inspired and daunted. The cycling boom in the Netherlands, he says, shows what's possible in Boston.

But he agrees that Boston is a long way from the needed cultural shift.

At an August public meeting in South Boston about bike lanes on West Broadway Street, the tone was vitriolic.

"There is no place for a bike lane," said Linda Castagna, 55, at the meeting. "It's dangerous enough as it is and on top of that I now have to be aware of a bicyclist?"

Rosenblum said it's hard not to get discouraged when he hears of such adamant anti-bike sentiment.

"You can talk till you're blue in the face about how [cycle tracks] are going to increase ridership," Rosenblum said, "but until you can prove it, they're not going to believe it. And you can't prove it until you do it -- that's the struggle."

Paul Basken
3311 Brooklawn Terrace
Chevy Chase, MD 20815

Purple Line FEIS - RECORD #697 DETAIL

First Name : Pam
Last Name : Browning
Email Address : pbrow@verizon.net

Submission Content/Notes : Thank you for the opportunity to submit a few of my many concerns about the proposed light rail:

THE CORRIDOR IS TOO NARROW -- there is no light rail in the U.S. that runs trains this fast, while running this frequently and this close to homeowners and trail users.

C.3

Years ago, the original plans for a light rail called for a single track light rail because the corridor is so narrow. The freight trains that previously ran in the corridor (over thirty years ago), ran only a few times a week, at about 15 mph, on a single track, and were screened by forest on both sides. With the Purple Line, this single track (which is now a trail) will be replaced by two tracks and a trail, with no trees, and with trains passing every three minutes. This narrow corridor is totally inappropriate for a fast running, double tracked, commuter line.

E.2

THE LOSS OF THIS POPULAR GREENSPACE WILL BE TRAGIC

The Trail has been documented to have 10,000 trail uses weekly as of 2006, and this number has grown steadily despite the fact that the Trail is not paved. Trail users are of all ages, races, nationalities, and abilities. There will be even greater need for greenspace and natural recreational trails in the years to come with Smart Growth and increasing urban density. The population of the Bethesda CBD will double in 15 years and these residents will need greenspace and recreational trails. The Trail to Georgetown is already saturated and dangerous -- with accidents becoming common. Where will all the new urban dwellers go for safe and tranquil outdoor recreation?

D.5

INCREASING DANGER ON THE TRAIL

The Trail is already crowded with trail users traveling at varying speeds, with a wide range of abilities, ie small children, elderly, strollers, etc., -- going in two directions, with high speed bikers passing in both directions all the while. To be fenced into a narrow bike lane with high speed bikers passing, and loud trains passing by at the same time, would be harrowing at best.

LOSS OF COMMUNITY COHESION

The neighborhoods of East Bethesda, Town of Chevy Chase, Edgevale, North Chevy Chase, Coquelin Run and Coquelin Terrace, would be divided by a transitway. These neighborhoods share the same middle school and high school. Children go back and forth, and use the Trail to get to Westland Middle School, Bethesda-Chevy Chase High School, Our Lady of Lourdes, and the Leland Community Center, not to mention each others homes. A transitway in this location seriously is destructive to community cohesion and is inexcusable transportation planning. What are planners thinking?

DANGEROUS LOSS OF ACCESS

Except at a few places, trail access will be lost for the neighboring communities. Currently there are many gates and open access points to the Trail. Most significantly, the loss of the Lynn Drive crossing will lead to youth jumping fences and cutting across the rails to get to school on time, etc. Even now, youth cut through back yards and climb fences to access the Trail. This will not stop even if there is a light rail. This is simply not a safe and reasonable location for a transitway, so close to homes and a popular Trail.

"The important message is that railroad tracks are places of business in a sense like a highway or an airport runway," Bob Sullivan, a CSX spokesman, said. "These are not places for recreation or taking short cuts'."

"Overall, the state has averaged slightly more than nine trespasser

E.11

deaths per year since 2003. Even fences built along railroad tracks aren't enough of an obstacle to deter trespassers. 'You can't fence off every bit of track, and when you try to do that people cut holes in it,' Rob Kulat (spokesman for the Federal Railroad Authority) said." (Source: Gazette newspapers)

LOSS OF 17 ACRES OF MATURE TREES INSIDE THE BELTWAY

These 17 acres of mature trees are some of the last remaining forest in lower Montgomery County and they are important for sediment control, clean water, clean air, carbon sequestration, shading the Trail, and providing a buffer for communities.

In closing, while light rail is a nice idea, the proposed route for the Purple Line is tragic in many regards.

Please take the time to re-think this unfortunate mistake before it is too late.

If not, you can be sure that I and hundreds of others, will not be afraid to stand between the trees and the bulldozers, if and when they come. Please advise your political leaders of this fact. Emotions will run extremely high at the prospect of the loss of this irreplaceable Trail and greenspace.

The EIS simply does not reflect the depth and breadth of passion felt for this tranquil forest and Trail in our increasingly urban environment.

Sincerely,

Pam Browning
1346 Wilson Rd.
Cloverdale, CA 95425

Purple Line FEIS - RECORD #698 DETAIL

First Name : john

Last Name : navratil

Email Address : johnnavratil@gmail.com

Submission Content/Notes : One only needs to look at the success of the Capital Crescent Trail to realize what a colossal loss we will experience for a dubious transportation project.

C.3

Purple Line FEIS - RECORD #699 DETAIL

First Name : Maj-Britt
Last Name : Dohlie
Email Address : Mdohlie@gmail.com

Submission Content/Notes : Putting light rail on the Capital Crescent Trail is the opposite of "smart growth". You would destroy the trail for walkers and bikers with the trees razed and noisy trains coming at great frequency. You would destroy the quality of life for nearby residents as well as for people in the region who use the trail.

C.3

K.2

B.1

E.5

You have been far from honest and forthright in your outreach efforts and in the FEIS, parcelling out small bits of information and highlighting advantages while underestimating or not properly addressing disadvantages. How can you pick this least cost effective, overly expensive option to the detriment of Maryland present and future tax payers? How can you get away with not really addressing the fact that you are razing 20+ acres of parkland and that this will have an impact on the environment, including the Chesapeake Bay?

C.1

Go back to the drawing board, improve the bus system and leave the trail for bikers and walkers who need natural environment for good health and quality of life - both of which are fast deteriorating in Montgomery County.

Purple Line FEIS - RECORD #700 DETAIL

First Name : Anne
Last Name : Edwards
Email Address : annemedwards@gmail.com

Submission Content/Notes : 21 October 2013

By email to FEIS@purplelinemd.com

To all reviewers of the 2013 FEIS for the Purple Line in Maryland,

My name is Anne Edwards and I am a Silver Spring resident whose home is very near the Wayne Avenue portion of the Purple Line. Thank you for this opportunity to comment.

We are in your immediate impact zone, for long-term permanent impact. We are asking for stipulation in any approval of this FEIS that more remedy will be forthcoming for the severe impacts that Purple Line design will have on our residential neighborhoods.

We are also asking that major elements, such as the location and engineering plan for the Traction Power needed for this area, be left OPEN until worked out between the neighborhoods and MTA.

All of the adverse impacts, all of them, can be mitigated. Remedies exist for all of them. But the remedies are absent from this FEIS and the impacts are only partially documented.

There has been far more extensive work done over the last years, in, with and for other neighborhoods on the Purple Line that also deserve remedy. But that same level of attention has not been brought to this half-mile residential Wayne Avenue corridor which is an EJ area on its entire south side.

I am part of the neighborhood group which has engaged with MTA since details first began emerging only in late Spring 2013, to improve what we have seen in fits and starts of it plans for Wayne Avenue.

Understand please, that we are all committed to having a Purple Line which is a showpiece, a genuine showpiece. But right now, on Wayne Avenue, from

what we are piecing together from the fine print of the FEIS conceptual engineering plans that we just saw for the first time five weeks ago, the light rail will be just another dirty train corridor, with industrial metallic infrastructure awkwardly overwhelming what were once really nice front yards.

And, I am writing this next sentence for myself but I want to point out the elephant in the room, without assigning any blame for who brought the elephant: This area – not even one half mile from the cracked and problematic Silver Spring Transit Center -- cannot afford to have and will not allow to happen that the very next high-profile public works project around here is done on the cheap and degrades the area, and is another cause for embarrassment – when it could be the opposite, a point of pride.

No one wants that former, including MTA. We know that. Maryland deserves better than that. We in these neighborhoods deserve better than that. Public transportation itself deserves better than that.

And the remedies that other cities are using would give us light rail neighbor of which we can be proud, but it will take more than a few cosmetic plantings dotted here and there.

You have the talent on staff already. Your MTA staff and their consultants have shown us in our interactions with them that they certainly have the skills-set and imagination to do a brilliant upgrade in this residential corridor, if they are empowered to do so. And so we are presenting a firm position in this FEIS response, which equates to political will on the scales, asking that they be instructed to do that upgrade.

A beautiful Purple Line enhancing a long-established residential neighborhood will make Maryland the standard other cities try to meet.

I write in full endorsement of the FEIS comment submitted to you separately today as a joint statement of my Seven Oaks-Evanswood Civic Association and our neighboring Park Hills Civic Association.

I attach it again to this email as a convenience for your reference, along with its appendix, the report we did for our neighbors on options for absorbing a Traction Power Substation into the neighborhood without insulting the neighborhood.

We all only want Purple Line be beautiful and a great neighbor: This
FEIS
doesn't paint that picture... yet.

I submit this respectfully and sincerely, and I am available at any time
that I may be of any help in this effort.

Anne M. Edwards
619 Greenbrier Drive
Silver Spring, Maryland

Email: anne.edwards@ymail.com OR AnneMEdwards@Gmail.com

Tel: +1 301 565 3101

Attachments :

PL_FEIS_joint_response_PHCA_SOECA_final_Oct_21_2013-1.pdf
(632 kb)

Wayne Ave TPSS Appendix 1 for FEIS Oct 2013.pdf (383 kb)

October 21, 2013

Purple Line FEIS Maryland Transit Administration
Transit Development & Delivery
100 S. Charles Street – Tower Two, Suite 700
Baltimore, MD 21201

Contact: Seven Oaks Evanswood Citizens Association, soeca.board@gmail.com
Park Hills Civic Association, melchris@erols.com

Comments about the Final Environmental Impact Statement from the Park Hills Civic Association and the Seven Oaks Evanswood Citizens Association, Silver Spring

Overview

Residents of the Park Hills and Seven Oaks Evanswood sections of Silver Spring and East Silver Spring, totaling about one thousand households, overwhelmingly support mass transit. We feel strongly that if we are to invest a significant sum of public funds to design and build a Purple Line light-rail system, one that will permanently impact our natural and built environment in profound ways, then it needs to be done right. Our response to the Purple Line Final Environmental Impact Statement addresses the following areas of concern:

- Noise and vibration issues
- Visual impacts on local environment
- Traction power substation
- Watershed impacts on Sligo Creek and Federal Clean Water Act Compliance
- Loss of mature tree canopy on Wayne / Impacts to school property
- Future Dale Drive Station
- Pedestrian and traffic safety challenges
- Mitigation during construction activity

For the record, we object to the short timeline for response to the very large, unwieldy and technical Purple Line FEIS. The FEIS introduces a lot of new issues that we have not discussed nor had time to closely review.

Our residential neighborhoods straddle the Wayne Avenue corridor between Fenton Street and Sligo Creek Parkway in Silver Spring. Our residents and patrons and employees of several neighborhood institutions will bear the brunt of the Purple Line's impact. Our neighborhoods, as well as nearby Sligo Branview neighborhood along Wayne Avenue, host the unique stretch of the 16-mile rail line where it is proposed that trains will travel close to front doors of homes in long-established neighborhoods while sharing lanes with cars on a smaller county road. As long-time observers of and participants in the local planning discussions, we are concerned that the high quality of investments are not being made equally across the length of the Purple Line system.

Furthermore, given that portions of Wayne Avenue have been designated “Environmental Justice” areas, we ask that the Maryland Transit Administration do more to significantly reduce impacts on residents, as well as employ sufficient mitigation measures to offset adverse effects including: noise and vibration, visual “noise” of catenary lines, nuisance of a large power substation in a tight residential area, watershed degradation and loss of verdant hillside on public school property due to road widening, elimination of nearly the entire mature tree canopy, loss of private property and right-of-way green space, vulnerability of upzoning for the residential area adjacent to a proposed station, potential for road traffic to collide with trains, and pedestrian dangers of complex intersections at Dale Drive and Sligo Creek Parkway – particularly for children attending the public middle and elementary schools located on Wayne Avenue.

Given that this proposed light-rail line will be the State of Maryland’s first foray into a significantly single-family residential community, it is in everyone’s interests that the Purple Line serve as a showcase for future light rail projects in sensitive and established neighborhoods. **Park Hills and Seven Oaks Evanswood communities request the MTA establish a working group with residents to meet monthly on design, implementation, construction and operation issues, with oversight of its progress outside of Purple Line staff, as we embark together on building this new transit system in our region.**

1. Noise & Vibration Issues

As residents who have attended, and in some cases convened, numerous meetings with the MTA Purple Line project team over the past 7 years, it is disconcerting to learn for the first time with the release of this FEIS in September of 2013, that noise impacts will extend to “500 feet of the planned route, both during construction and once trains began passing by 70 times a day,” as pointed out by the *Washington Post*. It was incumbent upon the State to inform residents of these detrimental impacts far earlier. We have had no time to react.

The same *Washington Post* article also revealed to local residents new details on the construction of the nearby Plymouth tunnel, a process that we are only now told will take 2½ years and one that will involve considerable noise, particularly during the blasting phase.

The FEIS does not document the current noise level in our neighborhood, which is very quiet at night. We are greatly concerned that too little attention was given in the FEIS technical report on the overall problem of noise with which we will have to live for decades; a total of only four sentences to address noise avoidance and minimization – a major quality-of-life issue for the hundreds of Park Hills and Seven Oaks Evanswood residents who live within 500 feet of the Purple Line, to wit:

- Given the steep grade of slope for one half mile on Wayne Avenue, as well as degree of curvature, wheel squeal is inevitable to some degree and a legitimate concern, and that is so identified by MTA. There are measures that can be used to minimize wheel squeal

that involve track lubrication (as in [San Diego's light rail](#), as well as Seattle's system); however, as pointed out by Gary Erenrich from Montgomery County's Department of Transportation, "it is unlikely that lubricating systems will be utilized on road surfaces that involve mixed traffic on a grade." "That the County has already ruled out one of the only known remedies for wheel squeal known to be effective, and MTA knew for some time that it is ruled out for shared lanes on Wayne, this extremely serious consequence for residents should be addressed in depth in any FEIS but MTA gives it no attention whatsoever. This is engineering, this is environmental impact on thousands of residents, and it is a glaring absence in this FEIS.

- It is discouraging to learn, in an independent assessment from a professional engineering firm, that, (1) "the MTA analysis contains a highly questionable assumed benefit from vehicle skirts" and, (2) "over time, wheels can get 'flat' and tracks can become rough due to 'rolling contact fatigue' - thus, without rigorous maintenance (e.g., wheel 'truing' and rail 'grinding'), light rail noise can increase 5–10 dBA. Continued community attention is reasonable." This same engineer concluded that, "if wheel squeal is properly addressed in the design process and maintained when the system is in operation, wheel squeal is a solvable problem."
- Finally, given that the tracks will be unheated, we are also concerned about the potential need to run the Purple Line continuously through the night during winter so that frozen precipitation does not adversely/prohibitively affect performance.

Our communities request a high level of attention to Purple Line noise; this is a fundamental quality of life issue for our residents. **Park Hills and Seven Oaks Evanswood need special assistance with wheel squeal on Wayne Avenue** - particularly eastbound between Cedar Street and where the road approaches Sligo Creek where braking and negotiating the curves on the downhill will cause severe squeal - **since lubrication of the tracks in mixed traffic is not an option**. Sound barrier walls are also not an option. At the very minimum, the Purple Line will have to travel very slowly through the Wayne Avenue corridor. If the Purple Line is funded through a Public Private Partnership (P3) mechanism, contract requirements must include the rigorous maintenance required to keep wheel noise to a minimum, and specific speed level requirements.

Additional noise from the "future" Dale Drive Station will adversely impact nearby neighbors. At least seventy trains are expected to stop at the station daily on each side, which will add to the noise from train signals and announcements. Special care must be taken to reduce both the sound of announcements, and arrival and departure signals that will impact the single family homes directly adjacent to the station, as well as the hundreds of homes within a half mile radius. **Acceptable noise levels for both the construction and operation of the Purple Line must meet not Federal standards as indicated in the FEIS, but the stricter more realistic standards of Montgomery County. We request a full review of noise mitigation options.**

2. Visual Impacts on Local Environment

MTA categorizes the Wayne Ave corridor a “high impact” area which means the visual impact of the Purple Line and its infrastructure will cause “an extensive change to the visual character” of our neighborhood.

The presence of catenary wires and their extensive supporting infrastructure, including power substations and their concomitant industrial strength, long, and high fencing truck-sized access for maintenance, will significantly degrade the visual environment of our residential, tree canopied, single family detached home neighborhood. Our neighborhoods are in the VAU-4 area in the FEIS.

MTA, after five years of engineering work, does not address, in the FEIS, visual impact mitigation for our high visual impact neighborhood, although it has done visual mitigation work in other sections of the route. Our neighborhoods expect stipulation if there is approval of this FEIS that MTA must remedy the visual impact in this VAU-4 area with comparable investment in budget and skill that it has expended for years in other sectors.

MTA renderings of the Purple Line on Wayne Avenue do not adequately or realistically capture the negative visual impact wrought by the light-rail line and its attendant hardware. We request MTA revisit options for a catenary-free systems like ones that are being employed in Europe and Asia. If a catenary system is used, we would like to see substantial investment by the County and State to minimize the effect of catenary wires.

The following visual impacts have neither been depicted on MTA drawings or maps, nor addressed with specific mitigation plans for residents in any aggregate matter. Most were discovered by residents only on September 7, 2013 when the FEIS volumes were released, and the existence of these items is buried in the data in the voluminous engineering conceptual drawings.

We urge that MTA is required to create visually accurate visuals depicting Wayne Avenue with the Purple Line and its infrastructure, showing how it will treat and mitigate, for the residences facing Wayne Avenue, the following elements which only appeared publicly in the FEIS fine print:

- Actual width of Wayne Avenue with Purple Line, showing before and after, when it is all built;
- Where, how many, and what kind of, Catenary Upright Poles and their wires, along residential Wayne Avenue in terms of frequency, color, height, placement;
- Whether catenary wires and new traffic signals are anchored to the sides of the street (in front yards) for the entire residential length of Wayne or are on a high chrome trusses across the street (which would also be anchored in front yards);

- Whether new traffic lights will span Wayne on large and high metallic trusses as happens for the light rail all around Baltimore, but unlike anything in this residential, verdant neighborhood;
- New “retaining walls” all the way along Wayne Avenue which appear in detail on some MTA blueprints but have not been discussed with residents;
- “New Signalized Pedestrian Crosswalks” MTA includes in its FEIS Chapter 4, 4.19.5 for residential Wayne Avenue, but never talked about with residents;
- Unacceptable clear-cutting of the scarce tree canopy along this Environmental Justice area on Wayne Avenue, the “before and after” all the old trees are removed, because – according to some MTA documents -- the MTA will destroy all trees along the route; MTA should revisit the Wayne Avenue route with the County’s ROW arborist and identify trees to save, which is possible with attentive planning;
- Sparse canopy for the next 20 years: MTA has never shown a tree replacement plan, actual heights of replacement trees, if and where they will be planted, plan for replacing those that don’t survive which statistics show are usually about 1 in 3, and what the route will look like in the next few decades, as it will take 15-20 years for any canopy to grow back;
- A half mile of new bright street lights all along residential Wayne resulting in powerful light pollution for residents and the seniors’ residential community that front the street;
- Dark spots where pedestrians are on foot approaching bright stations;
- The before and after plan for Sligo Creek Cabin Park and its trees and the rerouting of Sligo Creek itself;
- Significant change along Wayne Avenue for curbs and storm drainage along Wayne Avenue;
- Treatment of and impact on the more than 45 private driveways along Wayne Avenue;
- Retaining walls on school property and in front of single family homes.

We support the Art in Transit program where appropriate in our neighborhoods. We also urge MTA to work closely with the Montgomery County Planning Department in **redesigning the bridge over Sligo Creek to improve aesthetics that will mark this gateway to Silver Spring and homage to the natural feature of Sligo Creek and Sligo Creek Park.**

3. Traction Power Substation Nuisance

Park Hills and Seven Oaks Evanswood communities strongly urge MTA to move the traction power substation (TPSS) from its proposed site on Wayne Avenue at Cloverfield Road to another less residential location, and to bury that substation.

Given the significant expenditures that MTA is willing to make for other communities along the Purple Line (e.g., the optional [\\$40-50 million overpass](#) at Connecticut Avenue, sound baffling along the Capital Crescent Trail, two golf cart underpasses for the Columbia Country Club), we find the proposal to locate a traction power substation on Wayne Avenue near Cloverfield Road and “disguise” it with a high wall or “fake house” to be highly inadequate, particularly with respect to this residential area that MTA categorizes as a “design sensitive area.”

We are pleased that County Executive Ike Leggett and our 5th District Councilmember Valerie Ervin support residents’ desire to see this power substation relocated and buried. There is a growing movement among planners nationwide that substations and their settings must become more “neighborhood-friendly,” or power substations will never be let into established neighborhoods.

We are encouraged that MTA has engaged the Residential Wayne Avenue Working Group on Purple Line Design – representatives from four adjacent civic associations whose boundaries run along or near Wayne Avenue – on the issue of relocating the power substation. We have been waiting since April 2013 for assessment of power substation location options.

We endorse the study and recommendations by the Wayne Avenue Working Group on Purple Line Design calling for the traction power substation to be moved from the Cloverfield/Greenbrier location and buried, attached as Appendix 1 to this response.

4. Watershed Impacts on Sligo Creek and Federal Clean Water Act Compliance

Given the increased impervious surface due to road widening, as well as the installation of the paved hiker/biker “Green Trail” – in combination with significant loss of tree canopy along the Wayne Avenue corridor (see section below), the Purple Line route through the Sligo Creek watershed must be carefully designed and constructed through close coordination with M-NCPPC Montgomery County Planning Department environmental staff, Department of Environmental Protection, Department of Permitting Services stormwater and sediment control permit review, with oversight and coordination from the Maryland Department of the Environment and Department of Natural Resources in order to fully comply with federal Clean Water Act mandates.

Montgomery County DEP is charged locally with administering the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit Program, an EPA regulatory program administered in Maryland by the Maryland Department of the Environment. The program is intended to reduce and eliminate pollution from rainfall runoff, which flows through storm drain systems to local streams, ponds, and other waterways. Specifically, the goal of the MS4 Permit program is to restore and maintain the chemical, physical, and biological integrity of the nation's waters, as defined in the Clean Water Act, by controlling previously uncontrolled sources of pollution across the landscape that are transported by rainfall runoff or stormwater.

Sligo Creek, in particular, is subject to pollutant loading limits defining maximum amounts of pollutants that it can receive in order to meet water quality standards. **MTA must work with DEP and the Montgomery County Planning Department to assure compliance with federally mandated Total Maximum Daily Loads (TMDLs) allowed under the Clean Water Act. During tunnel construction at Manchester and Wayne, bridge construction over Sligo Creek on Wayne, Best Management Practices and additional measures must be taken to completely control sediment and erosion, as well as restricting the flow of toxins, trash, and other materials that will impair Sligo Creek beyond the TMDLs set by the Environmental Protection Agency (EPA).**

Moving beyond the construction phase, use of “green tracks,” including infiltration under the tracks, in sensitive areas such as Sligo Creek will work to reduce heavy metals, salt, organic molecules, and nutrients from entering the creek.

According to Doug Redmond, Natural Resources Manager for the County’s Department of Parks, the environmental impact of mature tree loss, and their protective shade which helps keep temperatures cooler, can be significant. In addition to the environmental harm caused by the loss of tree canopy, imperviousness is probably the biggest single negative impact on an urban watershed: rainfall tends to run off into streams, with the water being warm and dirty. The good news is that under Maryland’s Stormwater Management Act of 2007, the requirement for stormwater management and sediment control for projects has changed its focus. As a result of the Purple Line project, there will be an opportunity to implement stormwater management practices that are presently absent. Additionally, Park Hills and Seven Oaks Evanswood residents will monitor - under the watchful eye of the County and State, we expect - the relocation of Sligo Creek both 180 feet upstream and downstream of the Wayne Avenue bridge.

We will also be depending on the Maryland Department of Natural Resources to **ensure that MTA’s project plans will comply with the statutory and regulatory requirements of the Maryland Scenic and Wild Rivers Act to assure that the Purple Line will not jeopardize the scenic value of the Sligo Creek stream valley.**

5. Loss of Mature Tree Canopy on Wayne / Impacts to School Property

Park Hills and Seven Oaks Evanswood greatly value our tree canopy for its aesthetics, health benefits, air cleaing, noise absorbing and stormwater management functions.

According to MTA representative Mike Madden in October 2010, MTA had not yet counted the number of trees that would be removed along the Wayne Avenue corridor, stating that the tree inventory would be done during the Preliminary Engineering phase. However, in July 2013 when asked at a community meeting about tree canopy loss, MTA declined to present the inventory. “We would like to present this information to the group at a future meeting,” MTA officials said. Our tree canopy is a major visual characteristic of our neighborhoods. **We urge**

MTA to start now to implement a local native canopy trees replacement plan to at least partially mitigate what will be a huge loss to our community.

We are also deeply saddened that the reconfiguration of the parking lot at the Silver Spring International Middle School will result in additional loss of tree canopy – green space that is enjoyed daily by students, parents, and teachers. Once again, we encourage MTA to release tree removal and replanting plans now to mitigate tree loss on MCPS property, ROW, and private property.

Montgomery County has recently passed legislation reflecting the replacement value of mature trees. We would like to see MTA go beyond required replacement minimums to mitigate for specimen tree loss throughout the ROW and on parkland. MTA, in removing valuable and irreplaceable mature tree canopy, must focus on planting native canopy trees to eventually mitigate that loss. If the Purple Line is funded through a Public Private Partnership (P3) arrangement, the contract requirements must include planting and monitoring of trees over a three year period, until the survivability of each tree is ascertained.

It is important to point out that road widening is only one reason for the loss of trees on Wayne Avenue; the paved hiker/biker “Green Trail” is the other. **The Residential Wayne Avenue working group has introduced the idea to county planners of planting new native canopy trees now, and to also look into planting on private lawns, where owners welcome the idea of hosting a tree. MTA should also fund removal of stumps so as to allow for additional tree planting. We will continue to work with MTA and the County on ways to minimize tree loss along Wayne Avenue.**

6. Future Dale Drive Station

Montgomery County councilmembers affirmed that a station at Dale Drive would not be constructed without “community consensus.” Councilmembers did not define “consensus” or establish a method for collecting that consensus. **We urge MTA to work with the Montgomery County Council to fund and collect data that will reflect community support – or a lack thereof - for a Dale Drive Station before determining whether to build that station.**

The Purple Line Functional Master Plan’s key features of the Dale Drive Station concept plan include:

- there is no intent or desire to change the zoning in the single-family residential neighborhoods in and around the Wayne Avenue/Dale Drive intersection, if a station is established at this location in the future;
- the station is not included in initial construction phase; the timing of implementation to be determined;
- platform in median of Wayne Avenue; and

- access for walk-up users and persons with disabilities only.

One major downside to the proposed plan is that four stations in quick succession from the Silver Spring Transit Center in the space of only about a mile and a half, combined with the route traveling comingled with traffic along a road with many intersections, residences facing the train, an elementary and middle school, will negatively impact the speed of the light-rail line.

A much larger downside to the proposed Dale Drive station is that the surrounding residential area would then be vulnerable to upzoning given that, as a current practice, high density around transit stops is desired to maximize both ridership and public investment in a major transit line. We are encouraged by both the County's Purple Line Functional Master Plan and District 5 Councilmember Valerie Ervin's assertion on behalf of County Council that, "there is no intent or desire" to develop the area around the proposed Dale station. Nevertheless, County residents have been given such assurances in the past regarding upzoning, only to see them forgotten. For this reason, the Residential Wayne Avenue working group will continue to work with County Council and Montgomery Planning Department staff to enact protective measures to ensure that the area around Dale and Wayne retains its single-family home residential character.

7. Pedestrian & Traffic Safety Challenges

Wayne Avenue is the only section of the Purple Line where it is proposed that trains will run on the street while sharing lanes with cars. In Park Hills and Seven Oaks Evanswood communities, Wayne Avenue runs for about a half mile from a commercial area in downtown Silver Spring, past single family homes, a multiunit retirement community of nearly 200 active seniors and staff, a public middle school and elementary school, 45 driveways to single family homes, and a very well used county park. Multiple county agencies oversee slices of these issues, but MTA has responsibility for the overall pie and has yet to offer a coordinated presentation of the aggregate pedestrian and traffic safety plan for all of these pieces.

Our first concern is the safety of our children, and the children of neighboring communities who traverse Wayne Avenue to go to school or downtown Silver Spring. Many of the children of Park Hills and Seven Oaks Evanswood, in addition to those from other communities along the Purple Line's route, will cross Purple Line tracks or walk next to the tracks most days of the week while commuting to or from either Sligo Creek Elementary School or Silver Spring International Middle School. The County has suggested "safety fencing" all along the street, but the residents want other options rather than even more walls and hardware in our residential area. **MTA must work with Montgomery County Public Schools (MCPS) to implement a Purple Line safety education program for all children in the two schools in our neighborhood.**

Given the challenge and danger of having to cross the Purple Line, the Green Trail, local buses, and Dale Drive traffic, MCPS recommends consideration of a controlled signal intersection and using the best and most protective pedestrian safety engineering at Wayne Avenue and Dale

Drive. Park Hills and Seven Oaks Evanswood residents have also been informed that MTA, in conjunction with Montgomery County Park & Planning and the County Department of Transportation, has developed a working relationship with MCPS and already convened a number of meetings with representatives from both schools to work out various planning challenges related to the Purple Line – such as bus movements before and after school, automobile traffic at drop-off/pick-up times, and parking space for school staff. Park Hills and Seven Oaks residents are very concerned, however, that sidewalks along both sides of Wayne Avenue be given buffers to prevent pedestrians from being forced to walk immediately next to a widened road carrying vehicular traffic and a light-rail train.

Our communities are also concerned that the FEIS Transportation chapter neglects discussion of physical changes required for safety. We request MTA research and report on the maximum safe speed for the Purple Line on Wayne Avenue by providing data from the experience of other cities where light rail shares lanes, as the Purple Line will pass dozens of street front homes, 45 private driveways, seven neighborhood side streets, several churches, stores, parks, bus stops, schools as discussed above, a multi-unit resident for seniors, on a steeply sloped and curved, highly traveled road. Research is critical to determine a speed safe for sudden braking while traveling downhill on Wayne Avenue with a fully loaded train, in the event a child or out of control cyclist from the bike path suddenly appears in the road. These safety details are not covered in the FEIS.

Park Hills and Seven Oaks Evanswood communities would like to know if State or Federal law requires crossing gates at certain or all intersections, as are used in Baltimore. If crossing gates must be used, what is the noise level, infrastructure footprint, and physical space needed? Will additional traffic signals be installed on Wayne Avenue to better manage cross traffic?

We would like to see a discussion of these pedestrian and traffic safety questions in the FEIS:

- How will MTA manage pedestrian crossings which are now at uncontrolled intersections?
- Specifically, residents and employees of the Springvale Terrace retirement home must access the Ride On bus stop on the east side of Wayne Avenue at Springvale Road. Now, they cross at their peril at a marked but uncontrolled pedestrian crosswalk. How will MTA manage that pedestrian crossing?
- Where will other pedestrian crosswalks be placed on Wayne Avenue and what additional new pedestrian safety technology will be used?
- How does traffic moves if a car, truck or bus breaks down on Wayne Avenue.
- Will there be a system of fast response and removal in place?
- The same applies for trains breaking down. How will those trains be moved, and to where?
- What is the MTA requirement for train operators to hit their “warning clang” when vehicles, bicycles or pedestrians come too close to the train?

With increased traffic jams expected during construction and, at the least, early operation of the Purple Line, MTA must work with MCDOT and the Planning Department to protect the interior streets of single family home neighborhoods on either side of Wayne Avenue from cut-through traffic which is trying to circumvent heavy traffic. New “left turn lanes” may divert traffic off of Wayne Avenue onto Cedar Street and Dale Drive. MTA should work with County Department of Transportation to assess and propose traffic calming measures such as curb bump outs, speed tables or other devices that will discourage cut through traffic while keeping neighborhood residents and their children safe.

8. Mitigation During Construction Activity

We have the following general comments about the impact of Purple Line construction as they affect the Park Hills and Seven Oaks – Evanswood neighborhoods.

Temporary Construction Activities. We request that MTA use vacant or publicly-owned property, rather than privately-owned and developed property, for temporary construction activities. Moreover, we request that MTA restore properties affected through a temporary easement to an acceptable pre-construction condition following construction activities. We further request that, during construction that MTA provide parking facilities for County, MTA and contractor employees in a location or locations that do not adversely affect the quality of life of our residents.

Community Facilities within the Study Area. With regard to the significant public and private facilities — Sligo Creek Elementary School, Silver Spring International Middle School, Springvale Senior Community, and St. Michael’s church — within our neighborhoods, we request that there be regular and timely communication between the project contractor, MTA and other government agencies about any project activities that might adversely impact these facilities, with particular attention to the noise, vibration, traffic and construction impacts of construction activities. We would like to be kept timely informed of plans for the reconstruction of roadways, bicycle lanes, and the addition of new sidewalks

Proposed Staging Areas. With regard to the Proposed Staging Areas, we request that these areas be properties that will be acquired for the project.

Visual Assessment Units (VAU) (4-80). Because the Park Hills – Seven Oaks/Evanswood communities will be highly impacted by the project and as they considered an area of visual sensitivity, we request that the project contractor and the MTA use all means to improve the visual character of the project area, during construction and during project operations. We support the proposed use of the Art-In-Transit program to enhance key elements of the project.

Noise Sources Related to LRT Vehicle Operations (4-107). We request that MTA keep the community informed about its progress towards developing a a Bell & Horn Policy for the

Purple Line that would impact the Park Hills and Seven Oaks Evanswood communities. We would request a policy that both maximizes safety of our residents and visitors, but one that also takes into account the residential nature of our neighborhoods.

Noise During Construction. We request that MTA require the project contractor to take the following steps to minimize noise and vibration during construction:

- Notify the community of all blasting operations well before the activities commence.
- Schedule blasting or pile driving activities during hours that would least impact residents
- Divert heavy equipment and construction equipment movements away from sensitive receptors by utilizing roadways that contain a limited number of residential or sensitive structures.
- Hire a Blasting Consultant with adequate experience in performing controlled blasting.
- Set vibration limits for blasting
- Monitor the vibration of each blast.
- Conduct test blasts prior to full production blasts.
- Conduct pre-construction survey and post-construction survey in sensitive areas.

With regard to Project Construction (4-109), we urge

- MTA to conduct construction activities ONLY during the daytime
- Conduct truck loading, unloading and hauling operations in a manner that minimizes noise.
- Route construction equipment and other vehicles carrying spoil, concrete, or other materials over routes that would cause the least disturbance to residents in the vicinity of the activity.
- Locate site stationary equipment away from residential areas to the extent reasonably feasible with the site/staging area
- Employ the best available control technologies to limit excessive noise when working near residences.

Hazardous Materials 4.16 (4-134). According to MTA, in addition to impacts resulting from pre-existing contamination in the study area, the operation and the maintenance of the Purple Line could be associated with petroleum releases from the equipment and materials associated with the project. To this end, we request that MTA should release timely and publicly information on hazardous material encountered during construction, as well as information regarding the release of hazardous materials during operations. Moreover, MTA and the project contractor should take all possible means to secure any hazardous materials associated with construction or project operations so that they will not be a danger to the community. The Park Hills/Seven Oaks – Evanswood communities request that they be kept regularly informed about the storage

and use of hazardous materials in the Wayne Avenue corridor or anywhere in the project area adjacent to the Park Hills/Seven Oaks-Evanswood communities.

Conclusion

It is important to note that this is the first time MTA is building a light-rail line on shared streets through a single-family residential community. It is our fervent hope that the Purple Line serves as a showplace light-rail system. The Purple Line must be designed and constructed with great care devoted to all of the aesthetic, environmental, traffic calming, safety, noise abatement measures raised in our report. Otherwise, we fear that the Purple Line will result in a degraded Wayne Avenue corridor, which in turn will degrade the quality of life for the many nearby residents. We foresee the construction of other future light-rail projects in similarly sensitive residential areas, and it is critical that Maryland invest enough money, effort, and resources into the Purple Line so that other communities will want to emulate the example in Silver Spring.

Very sincerely yours,

Park Hills Civic Association
Alan Bowser, President
Chris Richardson, Vice-President
Paul Guinnessy, Secretary
Leslie Kramer Downey, Treasurer

Seven Oaks Evanswood Citizens Association
Jean Cavanaugh, President
Michael Gurwitz, Vice President
Tom Armstrong, Secretary
Bill Kaupert, Treasurer

October 21, 2013

Purple Line FEIS Maryland Transit Administration
Transit Development & Delivery
100 S. Charles Street – Tower Two, Suite 700
Baltimore, MD 21201

Contact: Seven Oaks Evanswood Citizens Association, soeca.board@gmail.com
Park Hills Civic Association, melchris@erols.com

Comments about the Final Environmental Impact Statement from the Park Hills Civic Association and the Seven Oaks Evanswood Citizens Association, Silver Spring

Overview

Residents of the Park Hills and Seven Oaks Evanswood sections of Silver Spring and East Silver Spring, totaling about one thousand households, overwhelmingly support mass transit. We feel strongly that if we are to invest a significant sum of public funds to design and build a Purple Line light-rail system, one that will permanently impact our natural and built environment in profound ways, then it needs to be done right. Our response to the Purple Line Final Environmental Impact Statement addresses the following areas of concern:

- Noise and vibration issues
- Visual impacts on local environment
- Traction power substation
- Watershed impacts on Sligo Creek and Federal Clean Water Act Compliance
- Loss of mature tree canopy on Wayne / Impacts to school property
- Future Dale Drive Station
- Pedestrian and traffic safety challenges
- Mitigation during construction activity

For the record, we object to the short timeline for response to the very large, unwieldy and technical Purple Line FEIS. The FEIS introduces a lot of new issues that we have not discussed nor had time to closely review.

Our residential neighborhoods straddle the Wayne Avenue corridor between Fenton Street and Sligo Creek Parkway in Silver Spring. Our residents and patrons and employees of several neighborhood institutions will bear the brunt of the Purple Line's impact. Our neighborhoods, as well as nearby Sligo Branview neighborhood along Wayne Avenue, host the unique stretch of the 16-mile rail line where it is proposed that trains will travel close to front doors of homes in long-established neighborhoods while sharing lanes with cars on a smaller county road. As long-time observers of and participants in the local planning discussions, we are concerned that the high quality of investments are not being made equally across the length of the Purple Line system.

Furthermore, given that portions of Wayne Avenue have been designated “Environmental Justice” areas, we ask that the Maryland Transit Administration do more to significantly reduce impacts on residents, as well as employ sufficient mitigation measures to offset adverse effects including: noise and vibration, visual “noise” of catenary lines, nuisance of a large power substation in a tight residential area, watershed degradation and loss of verdant hillside on public school property due to road widening, elimination of nearly the entire mature tree canopy, loss of private property and right-of-way green space, vulnerability of upzoning for the residential area adjacent to a proposed station, potential for road traffic to collide with trains, and pedestrian dangers of complex intersections at Dale Drive and Sligo Creek Parkway – particularly for children attending the public middle and elementary schools located on Wayne Avenue.

Given that this proposed light-rail line will be the State of Maryland’s first foray into a significantly single-family residential community, it is in everyone’s interests that the Purple Line serve as a showcase for future light rail projects in sensitive and established neighborhoods. **Park Hills and Seven Oaks Evanswood communities request the MTA establish a working group with residents to meet monthly on design, implementation, construction and operation issues, with oversight of its progress outside of Purple Line staff, as we embark together on building this new transit system in our region.**

1. Noise & Vibration Issues

As residents who have attended, and in some cases convened, numerous meetings with the MTA Purple Line project team over the past 7 years, it is disconcerting to learn for the first time with the release of this FEIS in September of 2013, that noise impacts will extend to “500 feet of the planned route, both during construction and once trains began passing by 70 times a day,” as pointed out by the *Washington Post*. It was incumbent upon the State to inform residents of these detrimental impacts far earlier. We have had no time to react.

The same *Washington Post* article also revealed to local residents new details on the construction of the nearby Plymouth tunnel, a process that we are only now told will take 2½ years and one that will involve considerable noise, particularly during the blasting phase.

The FEIS does not document the current noise level in our neighborhood, which is very quiet at night. We are greatly concerned that too little attention was given in the FEIS technical report on the overall problem of noise with which we will have to live for decades; a total of only four sentences to address noise avoidance and minimization – a major quality-of-life issue for the hundreds of Park Hills and Seven Oaks Evanswood residents who live within 500 feet of the Purple Line, to wit:

- Given the steep grade of slope for one half mile on Wayne Avenue, as well as degree of curvature, wheel squeal is inevitable to some degree and a legitimate concern, and that is so identified by MTA. There are measures that can be used to minimize wheel squeal

that involve track lubrication (as in [San Diego's light rail](#), as well as Seattle's system); however, as pointed out by Gary Erenrich from Montgomery County's Department of Transportation, "it is unlikely that lubricating systems will be utilized on road surfaces that involve mixed traffic on a grade." . " That the County has already ruled out one of the only known remedies for wheel squeal known to be effective, and MTA knew for some time that it is ruled out for shared lanes on Wayne, this extremely serious consequence for residents should be addressed in depth in any FEIS but MTA gives it no attention whatsoever. This is engineering, this is environmental impact on thousands of residents, and it is a glaring absence in this FEIS.

- It is discouraging to learn, in an independent assessment from a professional engineering firm, that, (1) "the MTA analysis contains a highly questionable assumed benefit from vehicle skirts" and, (2) "over time, wheels can get 'flat' and tracks can become rough due to 'rolling contact fatigue' - thus, without rigorous maintenance (e.g., wheel 'truing' and rail 'grinding'), light rail noise can increase 5–10 dBA. Continued community attention is reasonable." This same engineer concluded that, "if wheel squeal is properly addressed in the design process and maintained when the system is in operation, wheel squeal is a solvable problem."
- Finally, given that the tracks will be unheated, we are also concerned about the potential need to run the Purple Line continuously through the night during winter so that frozen precipitation does not adversely/prohibitively affect performance.

Our communities request a high level of attention to Purple Line noise; this is a fundamental quality of life issue for our residents. **Park Hills and Seven Oaks Evanswood need special assistance with wheel squeal on Wayne Avenue** - particularly eastbound between Cedar Street and where the road approaches Sligo Creek where braking and negotiating the curves on the downhill will cause severe squeal - **since lubrication of the tracks in mixed traffic is not an option**. Sound barrier walls are also not an option. At the very minimum, the Purple Line will have to travel very slowly through the Wayne Avenue corridor. If the Purple Line is funded through a Public Private Partnership (P3) mechanism, contract requirements must include the rigorous maintenance required to keep wheel noise to a minimum, and specific speed level requirements.

Additional noise from the "future" Dale Drive Station will adversely impact nearby neighbors. At least seventy trains are expected to stop at the station daily on each side, which will add to the noise from train signals and announcements. Special care must be taken to reduce both the sound of announcements, and arrival and departure signals that will impact the single family homes directly adjacent to the station, as well as the hundreds of homes within a half mile radius. **Acceptable noise levels for both the construction and operation of the Purple Line must meet not Federal standards as indicated in the FEIS, but the stricter more realistic standards of Montgomery County. We request a full review of noise mitigation options.**

2. Visual Impacts on Local Environment

MTA categorizes the Wayne Ave corridor a “high impact” area which means the visual impact of the Purple Line and its infrastructure will cause “an extensive change to the visual character” of our neighborhood.

The presence of catenary wires and their extensive supporting infrastructure, including power substations and their concomitant industrial strength, long, and high fencing truck-sized access for maintenance, will significantly degrade the visual environment of our residential, tree canopied, single family detached home neighborhood. Our neighborhoods are in the VAU-4 area in the FEIS.

MTA, after five years of engineering work, does not address, in the FEIS, visual impact mitigation for our high visual impact neighborhood, although it has done visual mitigation work in other sections of the route. Our neighborhoods expect stipulation if there is approval of this FEIS that MTA must remedy the visual impact in this VAU-4 area with comparable investment in budget and skill that it has expended for years in other sectors.

MTA renderings of the Purple Line on Wayne Avenue do not adequately or realistically capture the negative visual impact wrought by the light-rail line and its attendant hardware. We request MTA revisit options for a catenary-free systems like ones that are being employed in Europe and Asia. If a catenary system is used, we would like to see substantial investment by the County and State to minimize the effect of catenary wires.

The following visual impacts have neither been depicted on MTA drawings or maps, nor addressed with specific mitigation plans for residents in any aggregate matter. Most were discovered by residents only on September 7, 2013 when the FEIS volumes were released, and the existence of these items is buried in the data in the voluminous engineering conceptual drawings.

We urge that MTA is required to create visually accurate visuals depicting Wayne Avenue with the Purple Line and its infrastructure, showing how it will treat and mitigate, for the residences facing Wayne Avenue, the following elements which only appeared publicly in the FEIS fine print:

- Actual width of Wayne Avenue with Purple Line, showing before and after, when it is all built;
- Where, how many, and what kind of, Catenary Upright Poles and their wires, along residential Wayne Avenue in terms of frequency, color, height, placement;
- Whether catenary wires and new traffic signals are anchored to the sides of the street (in front yards) for the entire residential length of Wayne or are on a high chrome trusses across the street (which would also be anchored in front yards);

- Whether new traffic lights will span Wayne on large and high metallic trusses as happens for the light rail all around Baltimore, but unlike anything in this residential, verdant neighborhood;
- New “retaining walls” all the way along Wayne Avenue which appear in detail on some MTA blueprints but have not been discussed with residents;
- “New Signalized Pedestrian Crosswalks” MTA includes in its FEIS Chapter 4, 4.19.5 for residential Wayne Avenue, but never talked about with residents;
- Unacceptable clear-cutting of the scarce tree canopy along this Environmental Justice area on Wayne Avenue, the “before and after” all the old trees are removed, because – according to some MTA documents -- the MTA will destroy all trees along the route; MTA should revisit the Wayne Avenue route with the County’s ROW arborist and identify trees to save, which is possible with attentive planning;
- Sparse canopy for the next 20 years: MTA has never shown a tree replacement plan, actual heights of replacement trees, if and where they will be planted, plan for replacing those that don’t survive which statistics show are usually about 1 in 3, and what the route will look like in the next few decades, as it will take 15-20 years for any canopy to grow back;
- A half mile of new bright street lights all along residential Wayne resulting in powerful light pollution for residents and the seniors’ residential community that front the street;
- Dark spots where pedestrians are on foot approaching bright stations;
- The before and after plan for Sligo Creek Cabin Park and its trees and the rerouting of Sligo Creek itself;
- Significant change along Wayne Avenue for curbs and storm drainage along Wayne Avenue;
- Treatment of and impact on the more than 45 private driveways along Wayne Avenue;
- Retaining walls on school property and in front of single family homes.

We support the Art in Transit program where appropriate in our neighborhoods. We also urge MTA to work closely with the Montgomery County Planning Department in **redesigning the bridge over Sligo Creek to improve aesthetics that will mark this gateway to Silver Spring and homage to the natural feature of Sligo Creek and Sligo Creek Park.**

3. Traction Power Substation Nuisance

Park Hills and Seven Oaks Evanswood communities strongly urge MTA to move the traction power substation (TPSS) from its proposed site on Wayne Avenue at Cloverfield Road to another less residential location, and to bury that substation.

Given the significant expenditures that MTA is willing to make for other communities along the Purple Line (e.g., the optional [\\$40-50 million overpass](#) at Connecticut Avenue, sound baffling along the Capital Crescent Trail, two golf cart underpasses for the Columbia Country Club), we find the proposal to locate a traction power substation on Wayne Avenue near Cloverfield Road and “disguise” it with a high wall or “fake house” to be highly inadequate, particularly with respect to this residential area that MTA categorizes as a “design sensitive area.”

We are pleased that County Executive Ike Leggett and our 5th District Councilmember Valerie Ervin support residents’ desire to see this power substation relocated and buried. There is a growing movement among planners nationwide that substations and their settings must become more “neighborhood-friendly,” or power substations will never be let into established neighborhoods.

We are encouraged that MTA has engaged the Residential Wayne Avenue Working Group on Purple Line Design – representatives from four adjacent civic associations whose boundaries run along or near Wayne Avenue – on the issue of relocating the power substation. We have been waiting since April 2013 for assessment of power substation location options.

We endorse the study and recommendations by the Wayne Avenue Working Group on Purple Line Design calling for the traction power substation to be moved from the Cloverfield/Greenbrier location and buried, attached as Appendix 1 to this response.

4. Watershed Impacts on Sligo Creek and Federal Clean Water Act Compliance

Given the increased impervious surface due to road widening, as well as the installation of the paved hiker/biker “Green Trail” – in combination with significant loss of tree canopy along the Wayne Avenue corridor (see section below), the Purple Line route through the Sligo Creek watershed must be carefully designed and constructed through close coordination with M-NCPPC Montgomery County Planning Department environmental staff, Department of Environmental Protection, Department of Permitting Services stormwater and sediment control permit review, with oversight and coordination from the Maryland Department of the Environment and Department of Natural Resources in order to fully comply with federal Clean Water Act mandates.

Montgomery County DEP is charged locally with administering the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit Program, an EPA regulatory program administered in Maryland by the Maryland Department of the Environment. The program is intended to reduce and eliminate pollution from rainfall runoff, which flows through storm drain systems to local streams, ponds, and other waterways. Specifically, the goal of the MS4 Permit program is to restore and maintain the chemical, physical, and biological integrity of the nation's waters, as defined in the Clean Water Act, by controlling previously uncontrolled sources of pollution across the landscape that are transported by rainfall runoff or stormwater.

Sligo Creek, in particular, is subject to pollutant loading limits defining maximum amounts of pollutants that it can receive in order to meet water quality standards. **MTA must work with DEP and the Montgomery County Planning Department to assure compliance with federally mandated Total Maximum Daily Loads (TMDLs) allowed under the Clean Water Act. During tunnel construction at Manchester and Wayne, bridge construction over Sligo Creek on Wayne, Best Management Practices and additional measures must be taken to completely control sediment and erosion, as well as restricting the flow of toxins, trash, and other materials that will impair Sligo Creek beyond the TMDLs set by the Environmental Protection Agency (EPA).**

Moving beyond the construction phase, use of “green tracks,” including infiltration under the tracks, in sensitive areas such as Sligo Creek will work to reduce heavy metals, salt, organic molecules, and nutrients from entering the creek.

According to Doug Redmond, Natural Resources Manager for the County’s Department of Parks, the environmental impact of mature tree loss, and their protective shade which helps keep temperatures cooler, can be significant. In addition to the environmental harm caused by the loss of tree canopy, imperviousness is probably the biggest single negative impact on an urban watershed: rainfall tends to run off into streams, with the water being warm and dirty. The good news is that under Maryland’s Stormwater Management Act of 2007, the requirement for stormwater management and sediment control for projects has changed its focus. As a result of the Purple Line project, there will be an opportunity to implement stormwater management practices that are presently absent. Additionally, Park Hills and Seven Oaks Evanswood residents will monitor - under the watchful eye of the County and State, we expect - the relocation of Sligo Creek both 180 feet upstream and downstream of the Wayne Avenue bridge.

We will also be depending on the Maryland Department of Natural Resources to **ensure that MTA’s project plans will comply with the statutory and regulatory requirements of the Maryland Scenic and Wild Rivers Act to assure that the Purple Line will not jeopardize the scenic value of the Sligo Creek stream valley.**

5. Loss of Mature Tree Canopy on Wayne / Impacts to School Property

Park Hills and Seven Oaks Evanswood greatly value our tree canopy for its aesthetics, health benefits, air cleaing, noise absorbing and stormwater management functions.

According to MTA representative Mike Madden in October 2010, MTA had not yet counted the number of trees that would be removed along the Wayne Avenue corridor, stating that the tree inventory would be done during the Preliminary Engineering phase. However, in July 2013 when asked at a community meeting about tree canopy loss, MTA declined to present the inventory. “We would like to present this information to the group at a future meeting,” MTA officials said. Our tree canopy is a major visual characteristic of our neighborhoods. **We urge**

MTA to start now to implement a local native canopy trees replacement plan to at least partially mitigate what will be a huge loss to our community.

We are also deeply saddened that the reconfiguration of the parking lot at the Silver Spring International Middle School will result in additional loss of tree canopy – green space that is enjoyed daily by students, parents, and teachers. Once again, we encourage MTA to release tree removal and replanting plans now to mitigate tree loss on MCPS property, ROW, and private property.

Montgomery County has recently passed legislation reflecting the replacement value of mature trees. We would like to see MTA go beyond required replacement minimums to mitigate for specimen tree loss throughout the ROW and on parkland. MTA, in removing valuable and irreplaceable mature tree canopy, must focus on planting native canopy trees to eventually mitigate that loss. If the Purple Line is funded through a Public Private Partnership (P3) arrangement, the contract requirements must include planting and monitoring of trees over a three year period, until the survivability of each tree is ascertained.

It is important to point out that road widening is only one reason for the loss of trees on Wayne Avenue; the paved hiker/biker “Green Trail” is the other. **The Residential Wayne Avenue working group has introduced the idea to county planners of planting new native canopy trees now, and to also look into planting on private lawns, where owners welcome the idea of hosting a tree. MTA should also fund removal of stumps so as to allow for additional tree planting. We will continue to work with MTA and the County on ways to minimize tree loss along Wayne Avenue.**

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Our first concern is the safety of our children, and the children of neighboring communities who traverse Wayne Avenue to go to school or downtown Silver Spring. Many of the children of Park Hills and Seven Oaks Evanswood, in addition to those from other communities along the Purple Line's route, will cross Purple Line tracks or walk next to the tracks most days of the week while commuting to or from either Sligo Creek Elementary School or Silver Spring International Middle School. The County has suggested "safety fencing" all along the street, but the residents want other options rather than even more walls and hardware in our residential area. **MTA must work with Montgomery County Public Schools (MCPS) to implement a Purple Line safety education program for all children in the two schools in our neighborhood.**

Given the challenge and danger of having to cross the Purple Line, the Green Trail, local buses, and Dale Drive traffic, MCPS recommends consideration of a controlled signal intersection and using the best and most protective pedestrian safety engineering at Wayne Avenue and Dale

Drive. Park Hills and Seven Oaks Evanswood residents have also been informed that MTA, in conjunction with Montgomery County Park & Planning and the County Department of Transportation, has developed a working relationship with MCPS and already convened a number of meetings with representatives from both schools to work out various planning challenges related to the Purple Line – such as bus movements before and after school, automobile traffic at drop-off/pick-up times, and parking space for school staff. Park Hills and Seven Oaks residents are very concerned, however, that sidewalks along both sides of Wayne Avenue be given buffers to prevent pedestrians from being forced to walk immediately next to a widened road carrying vehicular traffic and a light-rail train.

Our communities are also concerned that the FEIS Transportation chapter neglects discussion of physical changes required for safety. We request MTA research and report on the maximum safe speed for the Purple Line on Wayne Avenue by providing data from the experience of other cities where light rail shares lanes, as the Purple Line will pass dozens of street front homes, 45 private driveways, seven neighborhood side streets, several churches, stores, parks, bus stops, schools as discussed above, a multi-unit resident for seniors, on a steeply sloped and curved, highly traveled road. Research is critical to determine a speed safe for sudden braking while traveling downhill on Wayne Avenue with a fully loaded train, in the event a child or out of control cyclist from the bike path suddenly appears in the road. These safety details are not covered in the FEIS.

Park Hills and Seven Oaks Evanswood communities would like to know if State or Federal law requires crossing gates at certain or all intersections, as are used in Baltimore. If crossing gates must be used, what is the noise level, infrastructure footprint, and physical space needed? Will additional traffic signals be installed on Wayne Avenue to better manage cross traffic?

We would like to see a discussion of these pedestrian and traffic safety questions in the FEIS:

- How will MTA manage pedestrian crossings which are now at uncontrolled intersections?
- Specifically, residents and employees of the Springvale Terrace retirement home must access the Ride On bus stop on the east side of Wayne Avenue at Springvale Road. Now, they cross at their peril at a marked but uncontrolled pedestrian crosswalk. How will MTA manage that pedestrian crossing?
- Where will other pedestrian crosswalks be placed on Wayne Avenue and what additional new pedestrian safety technology will be used?
- How does traffic moves if a car, truck or bus breaks down on Wayne Avenue.
- Will there be a system of fast response and removal in place?
- The same applies for trains breaking down. How will those trains be moved, and to where?
- What is the MTA requirement for train operators to hit their “warning clang” when vehicles, bicycles or pedestrians come too close to the train?

With increased traffic jams expected during construction and, at the least, early operation of the Purple Line, MTA must work with MCDOT and the Planning Department to protect the interior streets of single family home neighborhoods on either side of Wayne Avenue from cut-through traffic which is trying to circumvent heavy traffic. New “left turn lanes” may divert traffic off of Wayne Avenue onto Cedar Street and Dale Drive. MTA should work with County Department of Transportation to assess and propose traffic calming measures such as curb bump outs, speed tables or other devices that will discourage cut through traffic while keeping neighborhood residents and their children safe.

8. Mitigation During Construction Activity

We have the following general comments about the impact of Purple Line construction as they affect the Park Hills and Seven Oaks – Evanswood neighborhoods.

Temporary Construction Activities. We request that MTA use vacant or publicly-owned property, rather than privately-owned and developed property, for temporary construction activities. Moreover, we request that MTA restore properties affected through a temporary easement to an acceptable pre-construction condition following construction activities. We further request that, during construction that MTA provide parking facilities for County, MTA and contractor employees in a location or locations that do not adversely affect the quality of life of our residents.

Community Facilities within the Study Area. With regard to the significant public and private facilities — Sligo Creek Elementary School, Silver Spring International Middle School, Springvale Senior Community, and St. Michael’s church — within our neighborhoods, we request that there be regular and timely communication between the project contractor, MTA and other government agencies about any project activities that might adversely impact these facilities, with particular attention to the noise, vibration, traffic and construction impacts of construction activities. We would like to be kept timely informed of plans for the reconstruction of roadways, bicycle lanes, and the addition of new sidewalks

Proposed Staging Areas. With regard to the Proposed Staging Areas, we request that these areas be properties that will be acquired for the project.

Visual Assessment Units (VAU) (4-80). Because the Park Hills – Seven Oaks/Evanswood communities will be highly impacted by the project and as they considered an area of visual sensitivity, we request that the project contractor and the MTA use all means to improve the visual character of the project area, during construction and during project operations. We support the proposed use of the Art-In-Transit program to enhance key elements of the project.

Noise Sources Related to LRT Vehicle Operations (4-107). We request that MTA keep the community informed about its progress towards developing a a Bell & Horn Policy for the

Purple Line that would impact the Park Hills and Seven Oaks Evanswood communities. We would request a policy that both maximizes safety of our residents and visitors, but one that also takes into account the residential nature of our neighborhoods.

Noise During Construction. We request that MTA require the project contractor to take the following steps to minimize noise and vibration during construction:

- Notify the community of all blasting operations well before the activities commence.
- Schedule blasting or pile driving activities during hours that would least impact residents
- Divert heavy equipment and construction equipment movements away from sensitive receptors by utilizing roadways that contain a limited number of residential or sensitive structures.
- Hire a Blasting Consultant with adequate experience in performing controlled blasting.
- Set vibration limits for blasting
- Monitor the vibration of each blast.
- Conduct test blasts prior to full production blasts.
- Conduct pre-construction survey and post-construction survey in sensitive areas.

With regard to Project Construction (4-109), we urge

- MTA to conduct construction activities ONLY during the daytime
- Conduct truck loading, unloading and hauling operations in a manner that minimizes noise.
- Route construction equipment and other vehicles carrying spoil, concrete, or other materials over routes that would cause the least disturbance to residents in the vicinity of the activity.
- Locate site stationary equipment away from residential areas to the extent reasonably feasible with the site/staging area
- Employ the best available control technologies to limit excessive noise when working near residences.

Hazardous Materials 4.16 (4-134). According to MTA, in addition to impacts resulting from pre-existing contamination in the study area, the operation and the maintenance of the Purple Line could be associated with petroleum releases from the equipment and materials associated with the project. To this end, we request that MTA should release timely and publicly information on hazardous material encountered during construction, as well as information regarding the release of hazardous materials during operations. Moreover, MTA and the project contractor should take all possible means to secure any hazardous materials associated with construction or project operations so that they will not be a danger to the community. The Park Hills/Seven Oaks – Evanswood communities request that they be kept regularly informed about the storage

and use of hazardous materials in the Wayne Avenue corridor or anywhere in the project area adjacent to the Park Hills/Seven Oaks-Evanswood communities.

Conclusion

It is important to note that this is the first time MTA is building a light-rail line on shared streets through a single-family residential community. It is our fervent hope that the Purple Line serves as a showplace light-rail system. The Purple Line must be designed and constructed with great care devoted to all of the aesthetic, environmental, traffic calming, safety, noise abatement measures raised in our report. Otherwise, we fear that the Purple Line will result in a degraded Wayne Avenue corridor, which in turn will degrade the quality of life for the many nearby residents. We foresee the construction of other future light-rail projects in similarly sensitive residential areas, and it is critical that Maryland invest enough money, effort, and resources into the Purple Line so that other communities will want to emulate the example in Silver Spring.

Very sincerely yours,

Park Hills Civic Association
Alan Bowser, President
Chris Richardson, Vice-President
Paul Guinnessy, Secretary
Leslie Kramer Downey, Treasurer

Seven Oaks Evanswood Citizens Association
Jean Cavanaugh, President
Michael Gurwitz, Vice President
Tom Armstrong, Secretary
Bill Kaupert, Treasurer

Appendix 1 PL FEIS Response from Park Hills Civic Association and
Seven Oaks Evanswood Citizens Association, Silver Spring, MD

14 October 2013

Informal Report for the neighbors, on status of Wayne Avenue TPSS for the Purple Line

From: The Working Group for Residential Wayne Avenue Purple Line Design,
a collaborative effort of four civic associations along Wayne Avenue

Re: Request to MTA to power light rail along Wayne Avenue with a plan more compatible
with our area than putting an above-ground Two Mega-watt Traction Power Substation
unit at Wayne Avenue and Cloverfield Rd

Summary:

This Group expects to hear back from MTA soon on MTA's assessment of alternatives to its plan to put a 52'-long electrical Traction Power Substation above ground on one of the most highly visible lawns on residential Wayne Avenue. That lawn at Cloverfield Road is surrounded for blocks in every direction by single family homes and it sits under the windows of a community of 200 active seniors.

MTA readily acknowledges Wayne Ave is a "Design Sensitive Area" and a TPSS must be "disguised," but MTA's only disguise to date is to construct a high wall along Wayne Avenue that would need to be at least 10-feet high and more than 60-feet long, windowless, with large gates for a truck entrance.

The neighbors (SOECA) voted "no" to that plan –to an above ground unit with any façade – as inarguably incompatible with our neighborhood

But even before that, the neighbors had reached out to MTA offering ideas for alternatives – already being used in other US Cities – which faced the same challenge: How to put a needed power substation into a "nice" neighborhood that has no natural home for a 52-foot metal trailer

Listed below are options pointed out to MTA by the Wayne Avenue Group, options that in whole or in combination could be adapted to develop a better solution to power light rail along Wayne Ave:

1. Relocate this TPSS away from homes to one of several county properties very nearby, where there are already other mechanical out-buildings of what would be similar size;
2. Bury the TPSS – an increasingly "go-to" option in other U.S. cities – so the land above it is free for community use rather than being lost forever as a parking spot for a TPSS trailer;
3. Substitute several smaller TPSS units for one huge, 52-foot, Two-Megawatt TPSS unit because using even slightly smaller TPSS units opens up the options of where these units can go and how they can be disguised
4. And the neighbors asked Purple Line to come up with some alternatives of its own for us

Why Should I care if I don't live near Wayne and Cloverfield? Short answer: Direct bearing on your house values. Wayne Avenue is the shared "main street". Any permanent structure so prominent on Wayne, done well or badly, will affect house values in a half mile swath. Wayne Avenue is the entry street, the street of first impressions, for all of us.

Elected leaders are giving their support to our request that MTA design a more compatible plan

The Residential Wayne Avenue Group is asking all of our elected leaders to support this approach to MTA. Our approach does not involve imposing a specific solution on MTA but is about urging MTA to develop a more creative plan that will be compatible with this densely residential area

- Both Montgomery County Executive Ike Leggett and Councilmember Valerie Ervin are giving their support to the effort
- The neighbors are now discussing the issue with our State elected officials and staff in Annapolis who have told us that they will initiate follow up meetings with MTA

Maryland has a chance with this situation to set an example nationally

There is a growing movement among planners nationwide that Substations and their settings must become more “neighborhood-friendly” or TPSS will never be let into established neighborhoods no matter how great the need.

And, with the growing need for and investment in light rail, there is growing need nationally to put substations into many established areas

The challenge on residential Wayne Avenue is the perfect lab to innovate a solution

It genuinely gives Maryland the chance to set the national example how to add modern light rail to an old residential area, if we get this right.

I. THE TPSS MTA WANTS TO USE AT WAYNE AND CLOVERFIELD

BELOW (Photo #1) TPSS UNIT MTA WILL USE FOR THE ENTIRE PURPLE LINE



Purple Line TPSS
input: 13,200 Volt ac
output: 750 Volt dc

20 or so of these planned for the Purple Line;
Each is a Two-Megawatt electrical transformer,
52 feet long, 14 feet wide and about as high, with
Vents on roof, A/C extrudes from sides;
10-foot-plus perimeter for working access;
Spaced about a mile from each other

Appendix 1 PL FEIS Response from Park Hills Civic Association and Seven Oaks Evanswood Citizens Association, Silver Spring, MD

PHOTO #2 BELOW IS A GENUINELY TYPICAL TPSS SETTING (Charlotte, NC)

- TPSS must be about a mile apart and near light rail’s overhead wires. Even their mothers know TPSS units can be ‘unsightly’, so planners try to set them as remotely or low profile as possible
- Wayne Avenue’s residential setting presents a special challenge as a TPSS location.
- Remote or low profile locations are available for all the other 19 or so TPSS needed for the rest of the Purple Line and they will be set:



- Next to active freight railroad tracks;
- Next to or in industrial truck yards;
- Near or on big parking lots
- Alongside six-lane truck routes
- Behind office buildings,
or
- Hidden within truly heavy woods

Photo #2 – Old Pineville Road, Charlotte NC

PHOTO #3 BELOW: *Aerial of lawn proposed by MTA for TPSS (white circle at left) on Wayne Ave halfway between downtown Silver Spring (off farther to the left) and Sligo Creek Park (off farther to the right)*



- Residential Wayne Avenue presents Purple Line with its only area where power must get to light rail wires where there is nothing but densely-set single-family housing in every direction with the residence of nearly 200 active seniors immediately adjacent (on the left) to the TPSS site

PHOTO #4: The open lawn at Cloverfield Rd (lower left) & Wayne (on the right)



Photo #4 – looking north and east along Wayne Avenue at Cloverfield Road

- The TPSS high-walled enclosure would nearly cover the entire area of this lawn.
- The wall of the TPSS would run the length of the grass on all sides of this lawn.
- This particular lawn is visible to drivers for at least a quarter mile in each direction on Wayne because it's on the bend on the hill, and any structure in this place will create a lasting impression for a wide area of neighborhoods.
- This lawn also sits in a natural bowl and dozens of homes are on ground rising around it and they look down into this bowl, especially for the half the year when all the leaves drop.

MTA'S PLAN FOR A TPSS AT WAYNE AND CLOVERFIELD

MTA RENDERING, CLOSE TO SCALE



The TPSS unit is the interior tan rectangle, a metal-sheathed 52-foot long unit. MTA has added a small cosmetic "roof". A TPSS can also be "built in place" and shape-shift somewhat, and can be reconfigured for a more square shape of the same total area.

The enclosure would be 60-feet long minimum on its long sides and at least 10' high with no windows. The large truck gates are on the lower middle, crossing the planned bike and pedestrian path.

This is in a bowl and homes are on higher ground and would look down into this enclosure 24/7.

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Seven Oaks Evanswood Citizens Association, Silver Spring, MD

MTA RENDERING OF STREET LEVEL OF A SOLID FENCE ENCLOSING A TPSS
This would be the side facing Wayne Avenue



The wall or “fence” at 60’ long would be longer than any home in the area

There are no faceless walls like this anywhere around outside of the business district. And this is NOT the business district.

This long, high wall would be very close to the path for people and bikes

PHOTO #5: REAL LIFE EXAMPLE OF A TPSS INSIDE A HIGH ENCLOSURE



East Carson Blvd, Charlotte, NC

The green TPSS in here is about 40-feet long, smaller than the 52-foot model planned by MTA

This is NOT a residential area

PHOTO #6 - STREET VIEW, CHARLOTTE, NC TRACTION POWER SUBSTATION OBSCURED BY A WALL



Street level view shows actual enclosure, would be long and windowless with large truck gates and worker access gates.

II. ALTERNATIVES BEING USED IN OTHER CITIES

These alternatives being used in other cities were discovered by research of the Wayne Avenue Group.

They were pointed out to MTA, which said it would look into these alternatives.

The Residential Wayne Avenue Group also asked MTA engineers to contribute some new ideas of their own for a solution other than the original plan as depicted in the previous section

The Wayne Avenue Group pointed out these alternatives to MTA as ideas that in whole or in some combination, could be adapted for the TPSS needed somewhere on Wayne Avenue:

OPTION A: MOVE IT

IDEA IS TO RELOCATE JUST THIS ONE TPSS BARELY 500-600 FEET ONTO SOME PART OF COUNTY PROPERTY TO THE EAST

PHOTO #7: MTA wants the TPSS at Wayne and Cloverfield (white circle at left in photo); the neighbors asked if it could move SOMEWHERE to county properties nearby, perhaps including the edges of the county properties at the school (shown roughly by circle on the right).

That move would be less than 600 feet, which falls within the critical parameters for spacing required between TPSS that are Two-Megawatt units.



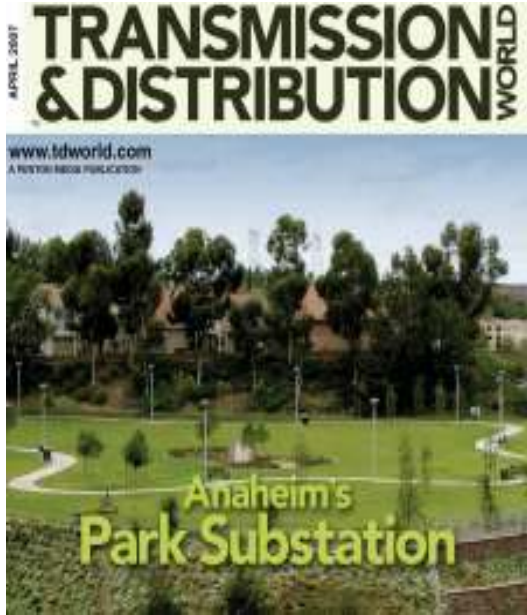
OPTION B BURY THE TPSS AND EVEN PUT A PARK ON TOP MODEL: ANAHEIM, CA

BURYING a substation is becoming the “go-to” option for many urban projects, particularly in areas where there is long term established development.

BURYING a substation, adding whatever worker access cavity is required, means the land on top of the TPSS can remain available to the community to be used for anything appropriate

When a TPSS is parked above ground, the entire property is “lost”, in perpetuity, for any other purpose.

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NOT BEYOND MARYLAND'S IMAGINATION:

ANAHEIM CALIFORNIA BURIED THEIR SUBSTATION INTO THE SIDE OF A HILL

AND PUT A PARK ON TOP

(PHOTO #7)



Photo #8 -- STREET LEVEL VIEW OF ANAHEIM

THIS IS THE SAME PARK

TRUCKS AND ENGINEERS GET INTO THE SUBSTATION THROUGH THE SIDE

VENTS AND ACCESS DOORS ARE HIDDEN BY SHRUBBERY UP IN THE PARK

A SITE UNSEEN: An electrical substation sits beneath Anaheim Hills' Roosevelt Park, which neighbors helped design.

MARK RIGHTMIRE, THE ORANGE COUNTY REGISTER

Photo #9: Dale at Wayne (below)



Silver Spring: There is open air county property at Dale and Wayne on the perimeters of the school

Even though it is a busy place, just for imagination, envision that a substation could be buried into the hill at Dale and Wayne, and if not a "park", even teacher and school event parking could go right back on top.

Objection to burying a substation: "Water table issues"

Counter: These same engineers, we observe with respect, are planning to dig a very large tunnel under downtown Bethesda for the Purple Line, and they are going to cut a very large wedge for the Purple Line through the hill at Manchester Road, continuing up Plymouth Street, to emerge past Flower Avenue: They know, one can trust, how to construct near a water table.

Objection: "Expense" of burying it

Counter: Our neighborhoods hold that we are as worth it as every other Marylander who needs special help to absorb light rail into their neighborhoods.

Counter: This is **not** as expensive as lifting the entire Purple Line over Connecticut Avenue when it could have crossed at street-grade level the way, the trail does now, which is the natural grade there.

Counter: This is **not** as expensive as putting the entire Purple Line down under Jones Bridge Rd and back up again when it could have crossed at street grade level which is the natural grade there.

OPTION III: USE SMALLER TPSS UNITS IN SOME AREAS TO INCREASE THE OPTIONS OF WHERE THEY CAN BE PLACED AND HOW THEY CAN BE DISGUISED

We asked MTA if units even existed that are smaller than 52 feet and two megawatts (2MW) and therefore several smaller units could be substituted for one large unit and provide the same power.

We found out on our own that the answer is YES, and we are waiting for MTA's response

- ***A light rail system can use a mix of TPSS units that are 1.0 MW, 1.25 MW, 1.5 MW and 2 MW***
- ***Those are all compatible in the same system: They all produce 750v***
- ***Lower MW units of lower capacity must be placed at closer intervals to each other than the very large 2MW units, but even the slight decrease in TPSS size opens up possibilities of where they can be positioned and of how they can be acceptably disguised***

We would hope to see an alternative developed around using a MIX of smaller and large TPSS units through Silver Spring:

- ***Large units where the room exists***
- ***Large units where they will not be seen, where they can hide well***
- ***Combined with SMALL units in long-established areas***

SUGGESTION OF PLACES ALONG WAYNE AVENUE WHERE A "SMALLER" TPSS MIGHT GO



Photo #10 Wayne Ave nearer Mansfield

JUST A POSSIBILITY that a *smaller* TPSS, disguised as a small brick-clad structure, could blend in, and fit in, as another small outbuilding near existing outbuildings somewhere on the eastern edge of the school property along Wayne



Photo #11 Wayne Avenue near Dale

JUST A POSSIBILITY THAT A *smaller* TPSS unit, brick clad to "blend in", might work somewhere – on the surface -- at the west edge of the open county property edging the school



Photo #12 – Wayne Ave near Whole Foods

JUST A POSSIBILITY that a *smaller* TPSS– again, brick clad to "blend in", could be put in one of several places on open-air county lots near Whole Foods on Wayne, even in the middle of a parking lot

SUGGESTED SPACE FOR A SMALLER TPSS: County Parking Garages



Photo #13: Wayne Ave Garage

JUST A POSSIBILITY for a smaller TPSS: This is outside the box and in the garage: A “Build-in-place” TPSS could be put together inside existing County parking garages, which guarantees worker access to it 24/7 as well as lighting, security and weather protection. This setting is identical to settings used to situate substations in dense urban core areas

A BRIEF DISCUSSION OF “THE FAKE HOUSE” OPTION

This is just what it sounds like: A Potemkin shell of a neighborhood-model home to hide a substation

The idea, used by planners in some other places, recently received media attention from news reporters and in online articles by thoughtful area writers, but it is not a current proposal by MTA for this TPSS, nor is it the wish of the neighbors – the adjacent stakeholders

No option is foreclosed in these discussions with MTA, but residents and MTA each have issues arguing against “fake house”

- MTA engineers of course can and should speak for themselves but for purposes of this note, we relay – briefly - that they have explained to us that “Fake House” present operational challenges to them ranging from containment and ventilation to access and design, all of which make “Fake House” not their first preference
- All of the adjacent neighbors unanimously express concern that a “Fake House” provides a perfect setting for street crime; even without “fake house” being an active proposal in any way for this TPSS, this “Fake House” is already the worst-kept-secret about an “unoccupied building” anywhere around
- The “Fake House” would have to be *huge, larger than anything in the neighborhood*, if it were to hide a Two Megawatt capacity substation
- The “House” would still need truck size service access doors, and a large pad for truck parking, and massive ventilation “fake chimneys”

So, the neighbors' concern is CRIME; the engineers' concerns are operational



CRIME is an issue around any long-term unoccupied stand-alone structure

Substations are often “hidden” in townhouses or storefronts in very urban areas, but those areas have a much higher natural population base with eyes on the property all the time than a stand-alone “home” in half-urb, half-burb area like ours

- A “fake house” on an urban block does not have FOUR dark sides at night; it has maybe one
- The high number of foreclosures in “nice” neighborhoods in recent years has created a high number of stand-alone unoccupied dwellings and there is early evidence that crime increased in their environs; urban planners are beginning to study that issue as a new phenomenon
- Until there are studies, the neighbors in the area of that lawn must rely on their own experience. We are all of us, already eyes on, whenever a neighbor is simply on vacation.

In closing

These ideas are much more complex and nuanced than could be described here. But there are certainly options to MTA’s original plan: Ask Norfolk, ask Charlotte, ask Portland, ask New York, ask Anaheim, the list goes on, and there are as many cities looking for better answers as there are TPSS needing homes.

We exist as a group only because we want to develop a better option. All suggestions, ideas and help are welcome.

Respectfully submitted,
Residential Wayne Avenue Group for Purple Line Design Issues
Group email: **WayneAvenueGroup@Gmail.com**

Cc: Wayne Avenue Group from four civic associations:
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