

WRITTEN COMMENTS ON PURPLE LINE AA/DEIS – SUBMITTED BY SEVEN OAKS-EVANSWOOD CITIZENS ASSOCIATION (SOECA), MARK GABRIELE, PRESIDENT – ISSUES RELATING TO THE ROUTING THROUGH DOWNTOWN SILVER SPRING AND ON WAYNE AVENUE

Ms. Diane Ratliff
Director of Planning
Maryland Transit Administration

I am submitting these written comments to be included in the record of the review of the Purple Line Alternatives Analysis/Draft Environmental Impact Statement.

I am Mark Gabriele; I reside at 831 Woodside Parkway, Silver Spring, Maryland 20910, and I am the President of Seven Oaks-Evanswood Citizens' Association (SOECA), which represents approximately 700 households directly to the northeast of the Silver Spring Central Business District, including a number of neighborhoods on Wayne Avenue and on both sides of Wayne, Dale Drive, and Sligo Creek Park as far west as Colesville Road.

The overwhelming majority of SOECA has asked MTA to route the Purple Line under a half mile of Wayne Avenue so as to connect with a tunnel under the downtown that MTA has studied but does not favor. The community believes that whether the Purple Line is light rail or bus rapid transit, tunneling under Wayne Avenue and downtown Silver Spring is necessary to improve the overall efficiency of the Purple Line and make it a more appealing transit option through Silver Spring, while avoiding increased traffic congestion in the downtown and significant adverse impacts to the adjacent neighborhoods to the east of the downtown. Our community welcomes the Purple Line, but insists that it be tunneled, such as has been the case for Metro through all neighborhoods in the District of Columbia where Metro does not run on a railroad right of way.

According to MTA data, the length of the downtown portion of the tunnel – from the Silver Spring Transit Center to Wayne Avenue – would be 4,350 feet, or just more than four-fifths of a mile. According to MTA, the length of a tunnel under Wayne from Cedar Street to Mansfield Road (emerging prior to Sligo Creek Parkway) would be an additional 2,575 feet, or just under half a mile. The total tunnel segment from the Silver Spring Transit Center to Mansfield Road would be 6,925 feet, or 1.3 miles.

This segment of the Purple Line in Silver Spring, if run at surface, is likely to be the slowest, most inefficient, and traffic-jamming segment of the 16 miles.

The surface route that the MTA has proposed on Wayne Avenue will bisect the community and will run on what will be the only essentially residential road in the entire 16 miles of the project, even if it also functions as an “arterial” road into the business center. Virtually all other segments of the Purple Line will be on current or former railroad rights of way or on wide boulevards. Moreover, MTA’s widening of nearly two-thirds of the just more than one mile on Wayne on which the surface route would run – primarily for long left-turn lanes at signaled intersections – will increase the traffic capacity on Wayne, and eventually traffic will grow to fill

it. The widening on Wayne will be combined with slow-moving lanes that are shared by Purple Line vehicles and cars. Ironically, traffic will increase, not decrease, on Wayne as a result of the Purple Line. Furthermore, prior to the Purple Line, the County had approved plans to effectively narrow Wayne Avenue by replacing a lane with what was to be the “Green Trail”, a bike path designed to increase the safety and convenience of bicycle commuting.

Even more importantly from the perspective of the County, a surface route from the Silver Spring Transit Center on roads through the center of downtown Silver Spring will have devastating traffic impacts on the business district, even worse than is the case today, and the vitality of the recently revived downtown, in which the County has heavily invested, will be threatened. According to MTA data, on the average of every three minutes from one direction or the other (every six minutes from one direction), during three-hour peak periods in both the morning and evening, long 180-foot-long trains will crawl past Georgia Avenue, enter the intersection of Wayne and Fenton Street diagonally as a fifth stream of traffic, and pass the parking lot entrance to the Whole Foods shopping center – at what are likely to be speeds of no more than 5 to 15 miles per hour. This surface route in the downtown is likely to increase traffic gridlock as well as convert what should be a rapid trip into a long slog through the downtown. It should be kept in mind that MTA’s figures indicate that only a small portion of the Purple Line ridership will be coming from cars, as most will be coming from buses and other forms of mass transit. Therefore, not many cars will be coming off the road to offset these traffic delays.

Tunneling

MTA and others have said that a tunnel would be too expensive, would not be cost-effective, and would provide few benefits. However, MTA recently released data that tends to indicate that while a tunnel is not cheap, it can be designed to be part of a “hybrid” route that keeps costs reasonable, improves ridership and travel times, and remains competitively cost-effective for purposes of qualifying for federal funding. After MTA released its study in October, it provided figures to the Montgomery County Planning Department for a “hybrid” (“mix and match” segments) for the entire 16 miles that would take what is known as the “medium-investment LRT alternative” and mix it with a tunnel under the downtown – keeping the surface route on Wayne but removing the stations at the new Silver Spring Library (Bonifant and Fenton Streets) and at Dale Drive. The results indicated that a hybrid with a tunnel under the downtown *is* cost effective (a term of art that the Federal Transit Administration uses for determining eligibility for funding). In fact, the cost effectiveness measure is virtually the same as the medium-investment light rail alternative that MTA evaluated – the cost effectiveness figures fall within 0.3% of each other. Moreover, MTA’s figures also showed that such a hybrid would both decrease travel time and increase ridership. In fact, ridership for the entire Purple Line increased by a significant 2,100 riders, even though MTA had indicated to the community earlier that a tunnel without stations at the library and Dale Drive would result in the loss of 2,375 riders.

The Montgomery County Planning Department has now requested that MTA provide data about a second hybrid – one that would be similar to the first hybrid, but, in addition, would include the half mile of tunneling under Wayne from Cedar to Mansfield. The Planning Department has estimated that this second hybrid would cost just under \$1.4 billion and that the cost effectiveness of this option would be within the acceptability range for purposes of federal

funding. The \$1.4 billion figure is still significantly less than the more than \$1.6 billion for the high-investment LRT alternative (which had been the most expensive of six LRT and BRT alternatives that the MTA had previously evaluated). Also, compare the \$1.4 billion figure with the \$5.2 billion cost of the Dulles Silver Line Metro project, which the Federal Transit Administration in early December recommended for federal funding in spite of the fact that the FTA had earlier indicated that this project was not cost effective.

Below is the chart that MTA provided the Planning Department on October 27, 2008 regarding the first hybrid:

Measure	Medium Investment LRT	Medium Investment LRT with High Investment Tunnel Segment*	High Investment LRT
2030 Daily Boardings	62,600	64,700	68,100
2030 New Daily Riders	11,000	11,200	12,300
2030 Annual User Benefits (hours)	6,389,000	6,601,000	7,299,000
Capital Costs (2007 dollars)	\$1,220,000,000	\$1,330,000,000	\$1,635,000,000
Annual O&M Cost (2007 dollars in millions)	\$25,000,000	\$24,000,000	\$22,200,000
FTA Cost-Effectiveness Measure (cost per hour of User Benefit) relative to TSM	\$22.82	\$22.89	\$23.71

* includes High Investment LRT segment between Silver Spring Transit Center and Manchester Place (tunnel segment between Silver Spring Transit Center and Wayne Avenue at Cedar Street; no Dale Drive station)

[Note: For FTA funding purposes, a project with a cost effectiveness figure of \$24.00 or less fall within the acceptability range. Where a project falls within the acceptability range generally does not matter to FTA. If the cost effectiveness figure is over \$24, the case for federal funding is much harder to make. In fact, the light rail alternatives, which MTA appears to favor, have much higher cost effectiveness figures (that is, they are less cost effective) than the bus rapid transit alternatives.]

MTA's Purple Line project manager, Mike Madden, was quoted in the Silver Spring Gazette on November 26, 2008 as saying that a tunnel on Wayne Avenue was not feasible since it would need to be tunneled very deep under Sligo Creek and could not reach the surface again until University Boulevard. This is not a helpful statement and is misleading in that it does not speak to the tunnel that the community is actually requesting. What Mr. Madden did not say is that for more than a year, the community has not asked for a tunnel under Sligo Creek, even though our written questions asking for substantiation of the MTA's engineering claims regarding the longer

tunnel were never answered. Since October 16, 2007, at an MTA focus group meeting at Oak View Elementary School in Silver Spring, the community (in response to the concerns that MTA raised) has asked that the shorter one-half mile tunnel under Wayne from Cedar Street to Mansfield Road – one that would emerge prior to Sligo Creek – be studied. For three months, until the middle of January 2008, MTA would not study this. Finally, MTA reported that they had performed a preliminary analysis of the shorter tunnel, and stated that it would study a tunnel no further. Therefore, a full study of the shorter tunnel was never conducted, and MTA's Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) contains only one paragraph on both the longer and shorter tunnel options under Wayne.

MTA gave the following reasons in the AA/DEIS, at pages 2-4 to 2-5, for not studying the half mile of tunneling under Wayne Avenue (that is, the shorter tunnel, which extending eastward would exit prior to Sligo Creek and which the community has asked for): It would add to the project cost and would have “a detrimental effect on the cost”; it would not provide sufficient benefit; it would not provide travel time benefits; it would be necessary to retain stations for the community and underground stations would cost too much; and a tunnel portal (entrance/exit ramp into/out of tunnel) would result in street widening and retaining walls in front yards due to steepness, as well property being taken from Sligo Creek Park.

However, the facts are these:

1. The figures MTA recently provided the Planning Department indicate that travel time and ridership would improve significantly, even with a tunnel that extends only under the downtown. Those figures will improve somewhat more with the additional half mile of tunneling under Wayne.
2. The same data which MTA provided the Planning Department shows that the costs are reasonable, and the implication that the shorter tunnel would not be cost effective appears not to be the case.
3. The community did not ask for a station at Dale Drive, either at surface or underground. The civic associations formally asked for a study of the longer tunnel under Wayne at the end of September 2007, and on October 16, 2007, MTA announced that the longer tunnel would not be studied and – at the same time – that it was adding a station on Wayne at Dale Drive for the surface route. Prior to the summer of 2007, there was also no station planned for the new library. Originally, there were to be no stations between the Silver Spring Transit Center and Long Branch, about the same distance between the Takoma Park and Silver Spring Metro stations. Presently, there are more planned stations for Silver Spring than for any other segment of the Purple Line. Moreover, in a community of almost exclusively single-family homes within a half mile of the proposed Dale station that are not closer to another station, there is no demonstrated need for a station at Dale. *The alleged need for a station at Dale, which is not supported by reality, should not be used as a reason why tunneling is not feasible under Wayne.*
4. An underground tunnel at Dale would have been the only underground station in the entire 16 miles of the Purple Line. The suggestion of an underground station came only from MTA and has been used to indicate that tunneling would also include a prohibitive \$100-110 million station at Dale.
5. Of course, there would be some widening of Wayne for a tunnel portal somewhere near

Mansfield Road. What MTA does not indicate anywhere in the AA/DEIS is that the tunnel portal would result in widening for the 350 to 400 feet of the portal length, compared to widening for a total of one-half mile (2,640 feet) on Wayne between Fenton Street and Sligo Creek Parkway for long left turn lanes and the Dale station that will accompany a surface route. (In fact, MTA's engineering drawings indicate that the surface route would result in approximately 625 feet of widening just for the Dale station – median extending from intersection, long platform, and phasing in of lanes to the station.) Because the surface route along Wayne requires a far greater amount of widening than what would be required for a tunnel portal, MTA's claim that street widening required to support the tunnel portal would represent an adverse impact on the community is disingenuous.

6. When mentioning the possibility of land being taken from Sligo Creek Park for widening due to a tunnel portal, MTA ignores the fact that for its addition of left-turn lanes at Sligo Creek Parkway in the surface route, there will be widening of Wayne for approximately 425 feet past the Park leading up to Sligo Creek Parkway.
7. Although it mentions that there would be widening due to a tunnel portal near Mansfield Road, there is little mention in the AA/DEIS of the widening due to a tunnel portal on Wayne at Cedar Street, at the very edge of the Silver Spring Central Business District (CBD), that would be built if a tunnel under downtown Silver Spring exited at Wayne and Cedar – one of the options which MTA did study in the AA/DEIS. And there is little mention of the widening of streets and the impacts on property, both within and outside of the right of way, of tunnel portals in other segments of the Purple Line, such as on Arliss Street in Long Branch.

Adverse Impacts of Surface Route through Downtown Silver Spring and on Wayne Avenue

The surface route through downtown Silver Spring and on Wayne Avenue has a number of significantly adverse impacts, most of which are not mentioned in the AA/DEIS. These adverse impacts have therefore not been conveyed to the public and decision-makers.

Interestingly, many of these were mentioned to representatives of the civic associations prior to release of the AA/DEIS. The adverse impacts include:

1. Traffic backups that will occur through downtown Silver Spring for several blocks on Georgia Avenue, Fenton Street, and Wayne Avenue as a result of long, slow trains passing through the downtown at 20 times an hour during long peak periods, as discussed above. Neither traffic through the downtown CBD nor traffic on Wayne with a surface route was adequately studied (this lack of an adequate traffic study is addressed below).
2. The loss of space at the long-promised community library due to the Purple Line cutting a wide swath across its property to stop. The proposed stop is only a four-block, six-minute walk to the Silver Spring Transit Center. All retail and housing, existing and planned, near the proposed library, including the Ellworth Street restaurants and shops/Whole Foods/Majestic Theatre/Marriott Courtyard Hotel and the planned development in the Fenton Village area of downtown south of Wayne Avenue, is within five to ten minutes of walking from the Silver Spring Transit Center for slow to moderate walkers.
3. The loss of one or two lanes of parking on Bonifant Street in the midst of a crucial area of redevelopment in the CBD. The loss of parking on one side of Bonifant will also affect deliveries to businesses on Bonifant.

4. The combined impact of the surface route and backup of cars entering and exiting the Wayne Avenue Garage in worsening congestion at the Wayne and Fenton intersection.
5. The impact of frequent trains on traffic entering and exiting the Whole Foods shopping center parking lot, and the impact from the parking lot on the surface route. Neither impacts on and from the Wayne Avenue Garage nor those relating to the Whole Foods parking lot are mentioned in the AA/DEIS despite MTA identifying them as areas of concern in meetings with representatives of the civic associations.
6. The impact of the Purple Line, including the street widening, on St. Michael's Church and its school across the street, including daily crossings of Wayne Avenue by a school full of children to attend mass.
7. The substantial widening of much of the just over one mile of Wayne on which the Purple Line will run, as indicated by MTA's engineering drawings, but not discussed (nor even summarized) anywhere in the AA/DEIS. This widening includes:
 - a. nearly two-thirds of the length of Wayne Avenue, from Fenton Street to the point 900 feet east of Sligo Creek Parkway where the train would veer off Wayne;
 - b. nearly 60% of the distance from Fenton Street to Sligo Creek Parkway;
 - c. virtually the entire block from Fenton to Cedar, and an additional 150 feet east of Cedar;
 - d. widening on Wayne at both sides of Dale Drive for a continuous length of approximately 1,200 feet;
 - e. widening on Wayne at both sides of Sligo Creek Parkway for a continuous length of approximately 1,350 feet.

Most of this will be for long left turn lanes at Fenton, Cedar, Dale, and Sligo Creek Parkway. The widening of Wayne on the eastern side of the Dale Drive intersection will be for a length of approximately 625 feet related to a station at Dale – but this is not mentioned in the AA/DEIS. Some of the widening will be to 70 feet, the width of Colesville Road. At Dale Drive, if MTA decides to put in two station platforms, the drawings indicate that the widening there would be to 90 feet.

8. The widening will result in loss of land from numerous front yards, both within and outside of the legal right of way. The AA/DEIS states that there will be some "strip acquisitions" but does not indicate where these, and all widening (not just the technical strip acquisitions, which are beyond the current right of way), are – even though the widening is indicated on the engineering drawings and the widening has been summarized by one of the civic associations.
9. The widening for long left-turn lanes will result in increased traffic capacity, and eventually increased traffic. This is not mentioned in the AA/DEIS and apparently not factored into the traffic analysis discussed in the Traffic Analysis Technical Report appended to the AA/DEIS.
10. MTA has indicated to the community – but not mentioned in the AA/DEIS or apparently factored into the traffic analysis – that traffic westbound on Wayne Avenue (from Sligo Creek Parkway to the CBD) will be delayed and prohibited from turning left onto Dale Drive toward Piney Branch Road while a train is in the Dale station.
11. The impact of passing trains, increased traffic, wider streets, and possible changes to the bike Green Trail (see below) on the pedestrian safety of independent residents at the Springvale Terrace Assisted Living facility on Wayne.
12. MTA does not indicate in the AA/DEIS that due to the extensive widening of Wayne for the Dale station, it plans to close the Wayne Avenue access to the large parking lot for Silver

Spring International Middle School and Sligo Creek Elementary School and reroute the traffic to Dale Drive and the side streets behind the schools. This will have significant adverse impacts on the schools, neighborhood, and traffic. Although MTA has on several occasions indicated this to the civic associations, it has not notified the two schools' administrators and PTAs of its plan, nor has MTA advised the community of any plan for a redesign of the parking lots that would be safe for the students and in compliance with the law.

13. MTA has told the community that in order to save space, it has recommended to the County that the planned bicycle Green Trail continuing on the north side of Wayne from Whole Foods to Sligo Creek be merged with the sidewalk into a combined bike/pedestrian path. This raises safety concerns for both bikers and pedestrians, including churchgoers, the elderly at Springvale Terrace, and the schoolchildren at the elementary and middle schools at Wayne and Dale. The surface level Purple Line on Wayne will have impacts on the Green Trail, whether it is merged with the sidewalk or not – but this issue is not identified in the AA/DEIS.
14. The noise analysis in the AA/DEIS apparently did not factor in the sounds of braking, clanging bells or beeping, and amplified announcements on the train and at the station as trains near the Dale station. It also did not fully account for the “wheel squeal” that occurs as trains round sharp curves – and there are numerous curves on Wayne.
15. The traffic analysis, as indicated in the Traffic Analysis Technical Report, was evidently based in part on an assumption that cars can travel at 45 miles per hour on Wayne, although the speed limit on Wayne is 30 mph, and at various times near schools, 25 mph. Indeed, the traffic test runs in the Traffic Technical report appear to indicate that at one point, *an MTA test vehicle traveling along the proposed route reached a speed of 50 mph.*
16. The traffic analysis was based upon an assumed traffic growth rate of less than 0.9% annually (not the “approximately one percent per year” stated in the AA/DEIS), despite the fact stated in the AA/DEIS that historical data for the past ten years has shown that the actual growth of traffic in the areas immediately adjacent to East Silver Spring are 1.5% annually and 1.9% annually, respectively. Despite repeated written requests by our community for additional traffic simulations using more realistic values than the 0.9%, MTA specifically declined to perform or provide that analysis.

(A tunnel route under downtown Silver Spring only, with a surface route on Wayne from Cedar Street eastward would have most of the adverse impacts discussed above, given the surface route on Wayne. However, other than indicate that there would be “visual impacts,” the AA/DEIS addresses very little of the impacts of a tunnel portal extending eastward for 350-400 feet on Wayne past Cedar where the downtown tunnel would emerge. These impacts would include widening for the full length of the tunneling. Moreover, a portal at Cedar Street would be one of the worst places on the route to place a portal, since it would be literally at the very edge of the CBD, a half block from the Whole Foods shopping center parking lot entrance on Wayne. This portal would prohibit a left turn from Wayne onto Springvale that provides the fastest access for emergency response paramedics to the Springvale Terrace Assisted Living facility. There would also be a substantial impact on traffic entering and exiting the downtown due to cars having to swerve widely around a portal at that point.)

MTA has never directly and specifically notified the 60 homeowners on Wayne, St. Michael's

Church and its school, Springvale Terrace Assisted Living facility, Sligo Creek Elementary School, and Silver Spring International Middle School of the widening on Wayne, traffic issues, and other potential impacts of the surface route. In fact, these are not adequately discussed, if at all, in the AA/DEIS, a document primarily intended to fully and accurately inform the public.

MTA's projected figures for daily station boardings at the Dale station (a station which was not requested by the community but which MTA has insisted on) is unrealistically high for each of the six light rail and bus rapid transit alternatives studied and does not conform to either field observation or common sense. For medium-investment light rail, the estimate is 1,400 daily boardings for that station a number that is considerably greater than the number of single-family homes (there are few other kinds of residences in the neighborhood) within a half mile of the station! This was also more than the 900 daily station boardings for medium-investment light rail that were projected at the next station to the west, Manchester Place, which is closer to a number of high-rise apartments than the planned Dale station. In fact, the County's daily station boardings at morning rush hour for the Ride On #15 bus (provided by the Planning Department) show only *four* (4) boardings at Dale Drive (and very few at nearby stops) and 145 at the Sligo Creek stop alone. Those using the Sligo Creek stop clearly live nearer to the planned Manchester Place station. It is difficult to see how there can be more than 200 daily station boardings at the Dale station, and yet MTA has used the alleged need for that station as a reason not to seriously consider tunneling under Wayne. Among other concerns about a station at Dale, the community is concerned that due to transit-oriented development, there will eventually be rezoning near such a station permitting commercial development and higher density residential development.

Earlier this year, the County Council took \$60 million dollars off MTA's budget for the Purple Line by authorizing County funds for the building of a south entrance to the Bethesda Metro station. It is clear that a primary purpose this construction is to facilitate the Purple Line and transfer between it and the Red Line. The cost of the half mile of tunneling under Wayne Avenue in poorer neighbor Silver Spring is thought by the Planning Department staff to be around \$65 million.

There seems to be consensus among many that an effective east-west transit system is needed in Montgomery and Prince George's Counties, and this community fully supports that concept. Yet, the Purple Line that has been proposed is not Metro, and it is not Metro-like rapid transit. According to MTA figures, the Purple Line is 8 to 10 minutes slower end to end (Bethesda to New Carrollton) at rush hour for medium-investment light rail than it now takes during rush hour to take the Red Line from Bethesda to DC Metro Center, transfer to the Orange Line, and take that to New Carrollton. The Purple Line AA/DEIS in its analysis of greenhouse gas emissions, at page 4-48, states that greenhouse gas emissions in the form of CO₂ emissions for each of the six light rail and bus rapid transit alternatives studied "demonstrate almost no change" from the No Build alternative in the same future year. It further states (same page), as confirmed by an accompanying chart, that all three light rail alternatives "are predicted to produce slightly higher CO₂ emission burdens as compared to the No Build alternative."

This community clearly believes that there are benefits to a Purple Line, but given the above drawbacks of a far less than stellar option – one that as designed does not compare to the Metro

system and is more of a streetcar system – does it make sense that neighborhoods adjacent to downtown Silver Spring and the usability of the downtown be sacrificed for this type of a Purple Line? Doesn't it make greater sense to try to correct the problems of what stands to be the weakest link in the system and do it in a way through the downtown and those neighborhoods that enhances the entire line, the downtown, and the community and that truly will be there for the next generation? Our Association has heard arguments that we can't "risk the project" by adding costs to the Purple Line. But if we are committed to building an infrastructure project that will last for 30 or 50 or 100 years, then isn't it important to build the best Purple Line that still meets the FTA cost-effectiveness guidelines? And isn't it a greater risk to build a Purple Line that is slow, that will be underutilized due to that lack of speed, and that will disrupt the Silver Spring redevelopment and a long-established neighborhood?

For these reasons, the Seven Oaks-Evanswood Citizens Association (SOECA) believes that it is necessary to tunnel any Purple Line through downtown Silver Spring and under Wayne Avenue for a half mile from Cedar Street to Mansfield Road.

Respectfully submitted,
Seven Oaks-Evanswood Citizens' Association (SOECA), Silver Spring
Mark Gabriele, President