

## **Appendix C – Staff Memorandums**

Historic Preservation Section	November 13, 2008
Park Planning and Stewardship Division	December 8, 2008
Vision Division	December 11, 2008
Environmental Planning Division	December 11, 2008
Urban Design and Preservation Division	December 19, 2008



**MONTGOMERY COUNTY PLANNING DEPARTMENT**  
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

To: Tom Autrey, Transportation Planner/Coordinator

Thru: Scott Whipple, Supervisor, Historic Preservation Section

From: Rachel Kennedy, Senior Preservation Planner  
Historic Preservation Section

Subject: Purple Line DEIS Alternatives Analysis

Date: 13 November, 2008

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The Historic Preservation Section (HPS) has reviewed the Purple Line Architectural History Technical Report dated September 2008 for potential impacts to historic properties. In general, the HPS believes that impacts are minimal to historic resources listed in the Montgomery County Locational Atlas, the Montgomery County Master Plan for Historic Preservation, or potentially eligible for listing in the Master Plan for Historic Preservation or the National Register of Historic Places.

To clarify the impacts, we have divided this memo into three sections. Each section deals with a different category of resources, which will be explained further under the appropriate heading. Please note that these comments are based upon the current proposed alignment of the Purple Line. If a change is made to the line's location, we will be required to comment again, as there are several Master Plan, Locational Atlas, and National Register sites located directly adjacent to the current alignment, which could be directly impacted.

*Purple Line Project Impacts to Locational Atlas Resources<sup>1</sup>*

Falkland Apartments (#36-12): The proposed Purple Line alignment would result in removal of one structure on the north parcel of the Falklands complex. This demolition would diminish the historic property's integrity of setting, feeling, and association and would be an adverse impact. The Maryland Historical Trust, the State Historic Preservation Office, determined in 1999 that the Falkland Apartments are eligible for listing in the National Register of Historic Places.

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<sup>1</sup> The Locational Atlas was created in 1976. Locational Atlas resources are subject to certain protections under §24A-10 of the Montgomery County Historic Preservation Ordinance.

According to a Maryland Transit Administration assessment, the proposed alignment:

will result in a small reduction in the amount of land in the northeastern parcel, the removal of approximately ten percent of the building on North Falkland Lane, [and] the removal of approximately 25 percent of the north building on East Falkland Lane...[which would] constitute an adverse effect.<sup>2</sup>

The Falkland Apt Complex is currently the subject of an Amendment to the Master Plan for Historic Preservation. The Planning Board recommended designating the south and west parcels and retaining the north parcel on the Locational Atlas until such time as the Planning Board approves a development plan for the entire north parcel.

*Purple Line Project Impacts to Sites or Districts listed in the Master Plan for Historic Preservation<sup>3</sup>*

There are no direct impacts to Master Plan Sites or Districts by the current alignment. However, a change in the alignment could result in an adverse impact to numerous Master Plan sites or districts, such as the Hawkins Lane Historic District (#35-54) or the Madonna of the Trails (#35/14-2).

*Purple Line Project Impacts to National Register sites or districts or properties eligible for listing in the National Register<sup>4</sup>*

The Historic Preservation Section has concerns about potential impacts to the following National Register properties. Please note that these properties may be eligible for listing in the Master Plan for Historic Preservation.

The Columbia Country Club (M:35-140) has been determined eligible for the National Register of Historic Places. While staff is not concerned about removal of the nonhistoric portion of the country club golf course for the Purple Line project, staff is concerned that removal of this parcel might negatively impact the remaining historic portion of the course, due to adjustments that will have to be

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<sup>2</sup> Maryland Transit Administration, "An Historic Preservation Assessment of the Falkland Apartments Complex in Silver Spring, Montgomery County, Maryland", Joan Randall, Parsons Brinckerhoff, Dec. 5, 2007, p 9.

<sup>3</sup> The Montgomery County Master Plan for Historic Preservation, created under §24A-3 of the County Code, is the official list of designated sites and districts that receive the full protections outlined in the county historic preservation ordinance.

<sup>4</sup> The National Register of Historic Places is the official list of the nation's historic places worthy of preservation. Under Section 106 of the National Historic Preservation Act and Article 83B Section 5-617 and 5-618 of the Maryland Code, all properties listed in or eligible for listing in the National Register must go through a review for impacts on historic places when federal or state undertakings (funding or licensing) are involved.

made to the historic setting due to this undertaking. Staff would want to work closely with the property owner to ameliorate any potential adverse effect.

Montgomery Blair High School (M:36-21) has been determined eligible for the National Register of Historic Places. A small portion of land associated with the school will have to be removed for the Purple Line project. Staff would want more information to assess the any historic significance of this land. The architectural technical report notes that no built resources will be impacted, however, an impact might be made to the resource's environmental setting.

The Flower Avenue Historic District is potentially eligible for the National Register (see page 2-29 of the technical report). The report notes that construction of the purple line could result in loss of a single house in the district. Obviously, staff would need more information to assess whether that one house (which has yet to be selected) would be important to the significance of the district.



**MONTGOMERY COUNTY DEPARTMENT OF PARKS**  
THE MARYLAND - NATIONAL CAPITAL PARK AND PLANNING COMMISSION

**December 8, 2008**

**To:** Tom Autrey, Transportation Planner/Coordinator,  
Transportation Planning Division, Montgomery County Planning Department

**From:** Doug Redmond, Section Leader, Resource Analysis Section,  
Park Planning and Stewardship Division  
Brooke Farquhar, Acting Supervisor, Park Planning and Stewardship Division  
Marian Elsasser, Landscape Architect, Park Development Division

**Via:** John E. Hench, Chief, Park Planning and Stewardship Division  
Douglas Alexander, Chief, Park Development Division

**Subject:** Purple Line DEIS and Alternatives Analysis

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**Background**

The Park Planning and Stewardship Division and the Park Development Division have reviewed the Draft Environmental Impact Statement (DEIS) for impacts to M-NCPPC parkland. It appears that the impacts overall will be minimal but there is the potential for substantial impact to two parks. In accordance with Section 4(f) of the Department of Transportation Act of 1966, any parkland which is taken for the project must be replaced, and it does not appear that potential replacement parkland has been identified.

The DEIS and Alternatives Analysis document presents six alternatives (some with sub-alternatives) for the Purple Line – three utilizing bus and three utilizing light rail. While impacts on parkland are evaluated in terms of acreage, the exact types of impacts have not been specified; once an alternative is selected, more specific impact analysis can be expected. With the exception of the Meadowbrook Maintenance Annex and the New Hampshire Estates Neighborhood Park, the impacts to individual parks will apparently be minimal, but issues such as access to the parks may become problems. From the standpoint of environmental impacts to parks, differences among the alternatives are minimal, and the Department of Parks is not expressing a preference for any alternative at this time.

The parks that are likely to be impacted include the Meadowbrook Maintenance Annex in Rock Creek Stream Valley Unit 1, Rock Creek Stream Valley Park (Stream Valley Unit 2), Sligo Creek Stream Valley Park (Stream Valley Units 1 and 2), Long Branch Stream Valley Park, Sligo Cabin Neighborhood Park, and New Hampshire Estates Neighborhood Park. In addition, the usage of the Capital Crescent Trail is likely to increase during construction.

**Meadowbrook Maintenance Annex, Rock Creek Stream Valley Park, SVU 1:**

One park which will be severely impacted is the Meadowbrook Maintenance Annex, which apparently will be completely eliminated by the project, but which has not been identified as public parkland within 500 feet of the alignment alternatives (not listed in Table 3-1 of the Preliminary Section 4(f) Evaluation Technical Report). Two maps of the park are attached.

It is possible that SHA missed this park because the property is not signed as parkland and is titled to Montgomery County (as is much of the M-NCPPC parkland in the County). The CIP included a trailhead for the Georgetown Branch Trail at this site.

### **Rock Creek Stream Valley Park**

Trail Connections: The current trestle bridge over Rock Creek is proposed to be replaced by two bridges. The lower bridge will carry the CCT. The CCT is recommended to connect to the Rock Creek Trail through a series of switchbacks, in areas with challenging topography and constrained by private property. There is not enough information to determine the feasibility of the trail connection as proposed from an engineering, environmental, or community standpoint. This trail connection is important for connecting the Rock Creek Hiker-Biker Trail to the CCT.

Bridge Design: The design of the bridges over Rock Creek will be important because of the prominent views of the bridges from both the Rock Creek stream valley and the Rock Creek Trail. The bridge design must be coordinated with M-NCPPC and the National Park Service. These bridges should be signature bridges as part of the continuation of the historic Rock Creek Stream Valley.

### **Sligo Creek Stream Valley Park, SVU 1 and 2**

Trail Crossings: Options 3, 4, 6, and 7 will cross Sligo Creek Parkway at grade on Wayne Avenue. Safe crossing of the purple line should be designed wherever the heavily used Sligo Creek Hiker-Biker trail crosses the Purple Line.

Sligo Creek Cabin Neighborhood Park: This neighborhood park is likely to be impacted by some of the options. The extent of the impact is not clear within the report. This is a heavily used park which will be soon receiving a renovated playground.

### **Long Branch Stream Valley Park**

The Purple Line is to be located on an existing road which already crosses Long Branch on a bridge. When the plans become more specific, this location should be studied more closely.

### **New Hampshire Estates Neighborhood Park**

Construction of the Purple Line is reported in the EIS to require removal of brick columns, walkways, and benches within the front of the park. Staff believes that the parking lot will also likely be removed. All of these facilities should be studied and replaced, with Department of Park's oversight. This park was completely renovated in 2000 and is an important and well used community amenity. It will be difficult to replace or mitigate because of the developed nature of this part of the County.

## **Safety and Security**

Capital Crescent Trail: During construction of the Purple Line, the Georgetown Branch Trail will be closed. This will likely create more usage of the Capital Crescent Trail as the only alternative off-road trail in the vicinity of Bethesda. MTA should study the impact to the M-NCPPC's portion of the CCT.

Construction Zones: Any construction zones on park property should be reviewed and approved by the Department of Parks for safety and security.

## **Stream and Wetland Mitigation**

Potential stream mitigation and wetland mitigation sites are listed in the Natural Resources Technical Report, and many of them are located on parkland. Coordination between MTA and the Department of Parks must begin as soon as possible to determine if any of these sites are feasible.

One indirect impact to parkland which must be evaluated is the bridge over Rock Creek. Although the bridge itself is within existing right-of-way, there is parkland (Rock Creek Stream Valley Park) immediately upstream and downstream of the right-of-way, and construction of the bridge has the potential to significantly impact Rock Creek within the Stream Valley Park downstream of the right-of-way. In addition, the replacement of the Wayne Avenue bridge over Sligo Creek may have impacts to the stream.

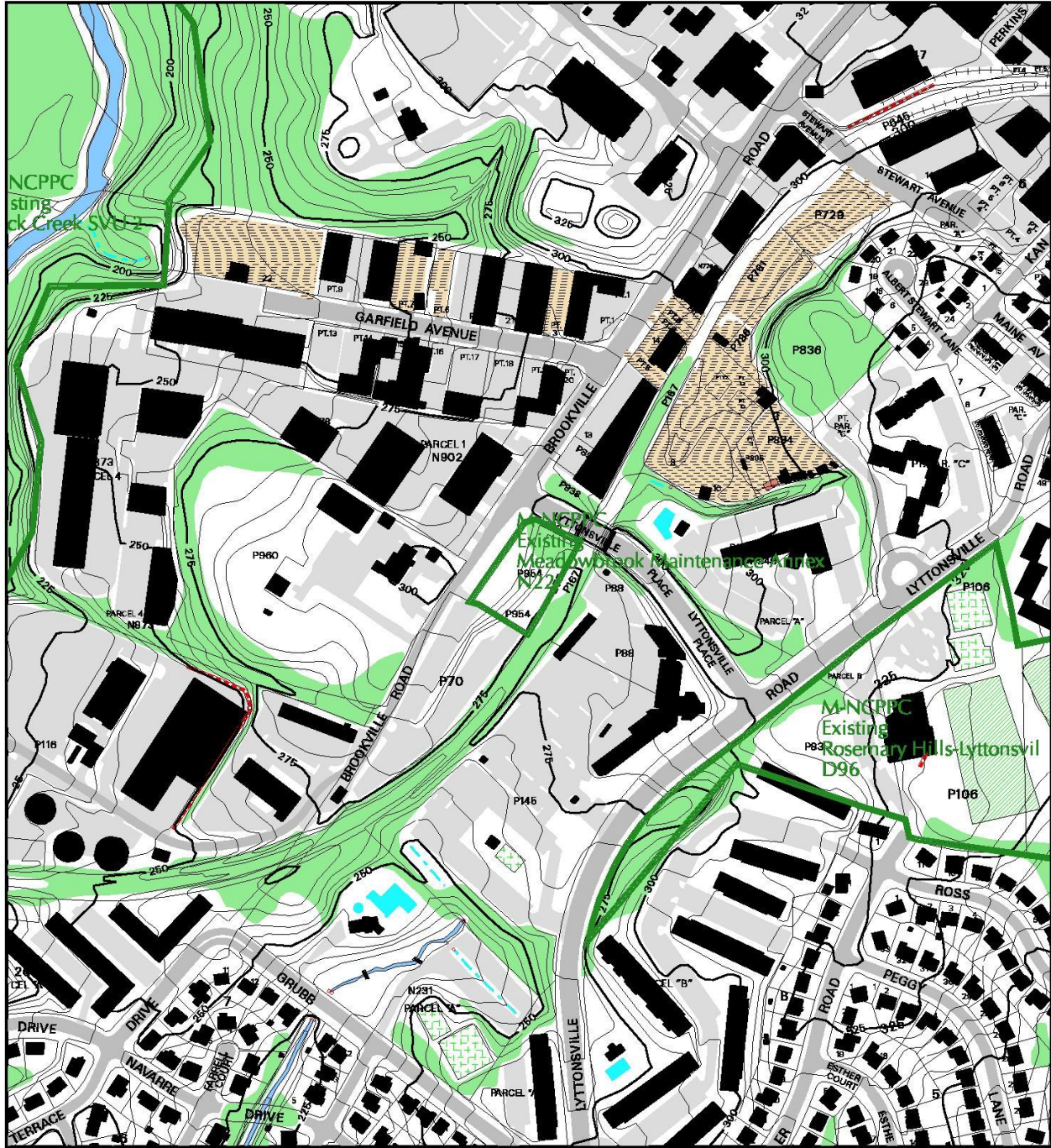
DR:BF:cg

cc: Mary Bradford  
Mike Riley  
Darien Manley  
Stephen Chandlee  
Brian Woodward  
William Gries

Enclosures:  
Meadowbrook Maintenance Annex2  
Meadowbrook Maintenance Annex



# MEADOWBROOK MAINTENANCE ANNEX 2



Map compiled on December 08, 2008 at 2:31 PM | Site located on base sheet no - 211NW03

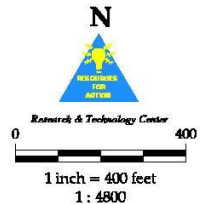
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Key Map



**MONTGOMERY COUNTY DEPARTMENT OF PARK AND PLANNING**  
 THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION  
 3707 Georgia Avenue - Silver Spring, Maryland 20910-3700



# MEADOWBROOK MAINTENANCE ANNEX



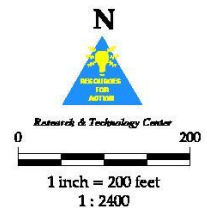
Map compiled on December 08, 2008 at 2:37 PM | Site located on base sheet no - 211NW03 | Date of Orthophotos: April 2006 - Used with permission from Montgomery County Government

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**MONTGOMERY COUNTY DEPARTMENT OF PARK AND PLANNING**  
 THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION  
 8787 Georgia Avenue - Silver Spring, Maryland 20910-3760





**MONTGOMERY COUNTY PLANNING DEPARTMENT**  
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

December 11, 2008

**FINAL MEMORANDUM**

**TO:** Thomas Autrey, Move Division

**Via:** Bill Barrow, Vision Division, Team Leader, South Central Transit Corridor Team

**FROM:** Melissa Williams, Vision Division, South Central Transit Corridor Team  
Kristin O'Connor, Vision Division, South Central Transit Corridor Team

**SUBJECT:** Comments on the Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) for the Purple Line alternatives

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The Purple Line (part of which has been referred to as Georgetown Branch Transit Way and which is also known as the Capital Beltway Corridor Transportation Study) has always been envisioned as a trolley/trail system that would provide east-west transit access from Bethesda to Silver Spring. It was later expanded from Silver Spring to College Park/New Carrollton. The general alignment of the trolley/trail between Bethesda and East Silver Spring is supported in the following approved and adopted Master and Sector Plans:

- Georgetown Branch Master Plan Amendment (1990)
- Bethesda-Chevy Chase Master Plan (1990)
- Bethesda CBD Sector Plan (1994)
- North & West Silver Spring Master Plan (2000)
- Silver Spring CBD Sector Plan (2000)
- East Silver Spring Master Plan (2000)
- Takoma Park Master Plan (2000)

**Georgetown Branch Master Plan Amendment (1990)**

This Plan Amendment designates the 4.4 mile Georgetown Branch right-of-way as suitable for use as the Silver Spring and Bethesda Trolley and the Capital Crescent Trail between Silver Spring and Bethesda. The implementation of the trolley/trail system was reconfirmed in the subsequent approved and adopted Master and Sector Plans: *Bethesda-Chevy Chase, Bethesda CBD, North and West Silver Spring, Silver Spring CBD, East Silver Spring and Takoma Park*. Recommendations include a single track fixed rail system, convenient pedestrian connections, direct access to Metro stations

(Bethesda and Silver Spring) and pedestrian friendly amenities (e.g. wider sidewalks, signalized crossings, benches, bike racks and attractive transit stops).

**Vision staff note that of the proposed BRT and LRT Purple Line alternatives in the DEIS; only the LRT alternatives conform to the approved and adopted Master Plans.** In addition, the DEIS reviewed other alternatives including a Transportation System Management (TSM) option, and a No Build alternative which were not in conformance with approved and adopted Master Plans.

### **Bethesda-Chevy Chase Master Plan (1990)**

The Plan reconfirms a single track rail and trail combination over the Georgetown Branch alignment between the Bethesda and Silver Spring (CBDs) as described in the *Georgetown Branch Master Plan Amendment (1990)*. An aerial structure and an above grade crossing are proposed in the DEIS and are in conformance with the Master Plans. However, this structure will have major visual impacts. Temporary impacts include the construction easements needed to relocate a golf cart roadway on the Columbia Country Club. These easements are required in the medium and high investment BRT and each of the LRT alternatives.

### **Bethesda CBD Sector Plan (1994)**

This Plan reconfirms the Georgetown Branch Master Plan Amendment and identifies light rail service to the Bethesda CBD with a station near the South entrance of the Bethesda Metro. This station would connect to the street via high capacity elevators. In the DEIS; only the low investment BRT alternative does not have a station at this location. The other alternatives including all of the LRT alternatives conform to the Master Plans.

The Plan reconfirms the hiker-biker trail as recommended in the Georgetown Branch Master Plan Amendment. In the DEIS, the trail west of Pearl Street, passing through the Wisconsin Tunnel is only included in the high investment LRT. The Bethesda CBD Sector Plan envisioned the trail connecting to Bethesda/Woodmont Avenue intersection via the Wisconsin Tunnel thereby offering a direct connection to the Capital Crescent Trail. **Vision staff strongly support the inclusion of the trail west of Pearl Street connecting to Bethesda/Woodmont Avenue via the Wisconsin Tunnel as this is the alignment envisioned in all the Master Plans.**

All of the BRT alternatives provide for an at-grade trail within the tunnel. The BRT vehicles in the Medium Investment and High Investment Alternatives enter the Woodmont East Plaza from Woodmont Avenue and continue westbound through the plaza to the station platform located in the tunnel. **Vision staff does not support BRT through the Woodmont East Plaza because buses running through the Plaza would be disruptive to its function as a public gathering space.**

All of the LRT alternatives include “tail-tracks” that would extend west from the tunnel into Woodmont East Plaza for an undetermined distance. Tail tracks would be used periodically to store a train before it returned to Lyttonsville or placed into service to at the beginning of peak period service. In order to reduce the impacts to Woodmont East Plaza, there should be additional study to move the tail tracks inside or closer to the tunnel. If this is not feasible, MTA should provide additional details on how their design impacts the function of the Plaza.

### **North & West Silver Spring Master Plan (2000)**

The plan reconfirms the Georgetown Branch Transit Way and Trail between Silver Spring and Bethesda. Each of the BRT/LRT alternatives requires the following: property acquisition from Round Hill Apartments (Freyman Drive) and Rosemary Hills Elementary School, expansion of existing Ride-On maintenance and storage facility to accommodate Purple Line operations and access to the trail limited to specific locations. Additionally, in all LRT alternatives, a temporary construction easement will be needed on five properties along Talbot Avenue. The size of these acquisitions along with the locations of pedestrian access to the permanent trail should be addressed in the Final EIS (FEIS). There has also been considerable encroachment into the Lyttonsville segment of the Capital Crescent Trail by local businesses. This issue has not been addressed in the DEIS. **Vision staff believe that the FEIS should detail the impact of any property acquisitions and displacements that will be necessary to accommodate the Purple Line in this industrial area.**

### **Silver Spring CBD Sector Plan (2000)**

The Sector Plan supports the implementation of a fixed-guideway transit system along the Georgetown and Metropolitan Branch right-of-ways. The plan acknowledges this transit system as active rail line with an adjacent trail that runs between Bethesda and Silver Spring. The DEIS indicates that increased right-of-way is necessary to accommodate this system and will require property acquisitions and displacements along Wayne Avenue and Bonifant Street. These acquisitions and the displacement of residential and commercial property are present in all alternatives except the TSM and No Build. There will also be impacts to the businesses along Bonifant due to the elimination of on street parking (North Side); an impact in all of the medium and high investment alternatives. A station at the proposed Silver Spring Library (southwest corner of Wayne Avenue and Fenton Street) is only included in the Low or Medium Investment BRT and LRT alternatives.

In order to accommodate this station, there must be a surface alignment from the Silver Spring Transit Center through East Silver Spring. **Vision staff advocates a station at the Wayne/Fenton/Silver Spring Library and believes it is necessary to support existing development and future revitalization activity.** This station with a surface alignment would contribute to the continued growth and vitality of Fenton Village business district. Staff does not support any alignment that does not include a Fenton Village station.

Staff also believes that the details of the property takes and the impacts of the elimination of parking along Bonifant Street (North Side) should be analyzed in greater detail.

### **East Silver Spring Master Plan (2000) and Takoma Park Master Plan (2000)**

The East Silver Spring Plan and Takoma Park Master Plans confirm the Capital Beltway Corridor Study. This study addressed two alternative routes, if a rail system along University Boulevard were approved: an at-grade University Boulevard alignment with stations at Piney Branch and New Hampshire, and a below-grade University Boulevard tunnel alignment from Takoma Park to the Silver Spring Metro Station.

The at-grade (surface) alignment is similar to the low and medium investment alternatives of the DEIS, which has stations located along University Boulevard at Gilbert Street and at New Hampshire Avenue.

This proposed alignment is an issue for residents of the Wayne Avenue community due to concerns about a number of impacts: train noise (i.e. wheel squeal and approaching train signaling), property acquisitions needed to install new left turn lanes along Wayne Avenue and Piney Branch Road and additional widening of the Wayne Avenue right-of-way in order to accommodate the Dale Drive station. The DEIS does identify wheel squeal as an impact in all of the LRT alternatives, with the majority of the impact being with 300 feet of Wayne Avenue. There would also be temporary construction easements for right-of-way at the Silver Spring International Middle School and the short term impacts of driveway reconstruction on several homes.

A tunnel alignment was shown for each of the medium and high investment BRT and LRT alternatives. None of these alternatives conform to the Master Plans' below-grade alternative, which proposed a tunnel from Silver Spring under Takoma Park to University Boulevard. A tunnel alignment from Silver Spring Transit Center to Manchester Road is favored by many in the Wayne Avenue community as a way to eliminate the property acquisition impacts which are present in all of the Build alternatives. However, a tunnel would also have community impacts. While there would be little if any property acquisition; there would be temporary impacts during tunnel construction and the required tunnel portals would have trenching that extends well beyond the actual portals. This will pose a significant barrier to the community and will impair the ability of residents to cross the right-of-way in certain locations. Further study to determine the impacts of the proposed tunnels and portals should be in the FEIS.

**Vision staff supports a surface alignment along Wayne Avenue without the Dale Drive station as the tunnel and the resulting portal will prove disruptive to community, mobility and cohesion.** By removing the Dale Drive station, MTA could eliminate some of the noise impacts associated with stations in a residential area. Additionally, the increased right-of-way along Wayne Avenue and the associated property acquisitions at Dale Drive and Wayne Avenue for the Dale Station would be eliminated.



Vision staff believe that the ½ mile walk radius established in the DEIS for stations, indicates that ridership from the eliminated Dale Station could be absorbed at the Silver Spring Library and Manchester Road Stations.

In the Long Branch community, all of the LRT alternatives result in the displacement of the following: an apartment building on Plymouth Street and a home located at the intersection of Arliss Street and Flower Avenue. The Plymouth Street tunnel will require right-of-way acquisition at six (6) properties along Plymouth and Reading Streets. The DEIS does not detail the property acquisition and temporary construction easements needed in each of the Build alternatives in Takoma Park.

MTA has not determined the amount of right-of-way needed along University Boulevard nor does the DEIS address the replacement of sidewalks, tree panels and newly installed pedestrian safety amenities (i.e. signalized crossings, median fencing and crosswalks) that will be removed to accommodate the Purple Line. This is an area with high volumes of pedestrian activity and is one of the most heavily trafficked intersections (University Boulevard and New Hampshire Avenue) in Montgomery County. While pedestrian safety measures will be addressed in the forthcoming Takoma/Langley Crossroads Sector Plan, MTA should further examine the impacts of how their proposed increases to the right-of-way will affect pedestrian safety in the FEIS.

The following is a summary of the overall community impacts along the Montgomery County segment of the Purple Line:

- Loss of mature trees and resulting change in the trail experience
- Loss of vegetation that screens adjacent homes
- Reduction in residential and commercial properties along proposed alignment (specifically Lyttonsville industrial area, Barrington Apartments, Northern Part of Falklands Apartments, 16<sup>th</sup> Street Strip Commercial Center)
- Loss of direct trail access from the community due to track fencing, landscaping and other rail engineering
- Under each of the Build Alternatives, access to schools during construction (i.e. Silver Spring International School and Rosemary Hills Elementary) and trail access from Leland Community Center and other public facilities would be disrupted

### **Recommendations for the FEIS**

Below are some issues Vision Staff feels should be addressed in the FEIS:

- The MTA project team should study the impacts of moving the tail tracks at Woodmont East to reduce the impacts on the future planned civic space.
- A spur should be considered to the federal employment centers, such as National Navy Medical Center (NNMC) and NIH in Bethesda and the Federal

Drug Administration (FDA) in White Oak. Centrally located stops should be provided to serve these facilities,

- The Purple Line should provide an adequate buffer between the trail and private property. This is particularly important in locations where the ROW is constrained and the trail will be located next to a retaining wall between the tracks and the trail.
- Adequate screening of the noise/retaining walls proposed along the entire Purple Line route should be considered.
- If lighting is provided for the transit way, the project should provide cut-off fixtures that provide zero spill-over on adjacent property.
- Encroachment of industrial and commercial structures in Lyttonsville into the Georgetown Branch right-of-way is not addressed in the DEIS. MTA should provide additional information regarding displacements, easements and acquisitions needed to reacquire this right-of-way.



**MONTGOMERY COUNTY PLANNING DEPARTMENT**  
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

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**Memorandum**

**To:** Thomas Autrey, Move Division

**From:** Tina Schneider, Senior Environmental Planner, Green Division *Tina Schneider*  
Michael Zamore, Environmental Planner Coordinator, Green Division *MZ*

**Via:** Mary Dolan, Master Planner/Supervisor, Green Division *MD*

**Date:** December 9, 2008

**Subject:** Comments on the Draft Environmental Impact Statement for the Purple Line

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This memo describes the comments of Environmental Planning Division staff on the *Draft Environmental Impact Statement/Draft Section 4(f) Evaluation, September 2008* and the *Natural Resources Technical Report (NRTR)*.

**Discussion**

The DEIS evaluates and quantifies the direct and indirect impacts of the Purple Line alternatives to natural environmental features and resources. Chapter 4 of the DEIS addresses Environmental Resources, Impacts, and the Mitigation. Environmental Planning staff reviewed the following portions within that section: air quality; habitat and wildlife; water resources; topography, geology, and soils; energy analysis; and indirect and cumulative effects analysis.

The Environmental Planning staff reviewed the Natural Resources Technical Report (NRTR) including chapters on existing conditions and effects on: topography; groundwater and hydrogeology; surface water resources/water quality; scenic and wild rivers; floodplains; waters of the United States; air quality; and terrestrial habitat and wildlife.

The 18-mile corridor is located primarily within urban and suburban areas of Montgomery and Prince George's Counties. As such, very few areas within the study corridor support large intact habitats. The portions of the corridor supporting larger tracts of natural forested habitat occur primarily within the larger stream valleys, including Rock Creek, Sligo Creek, Northwest Branch, and Paint Branch (in Prince Georges County). Environmental Planning staff comments are as follows:

1. NRTR: **Ground water:** Section 2, page 20. Groundwater could potentially be affected within High Investment BRT and the LRT Alternatives due to the tunnel components..." "Construction of tunnels would likely require temporary drawdown of the local groundwater table..."
  - This section should evaluate the effect will this have on the adjacent streams, wetlands and groundwater table.
  
2. NRTR: **Rock Creek:** Surface Water Resources: Section 2, page 22: Tributary to Rock Creek is Coquelin Run which originates south of Bethesda, flows east paralleling the south side of the Georgetown Branch Trail, etc.
  - This section should examine the potential impacts to Coquelin Run from the construction of the light rail.
  
3. NRTR: Waters of the United States: Section 2, page 75-76: This table shows the potential wetland mitigation sites selected for this project as compensation for the wetland loss. Most of the proposed sites are located within existing parkland and must be approved for selection with MNCPPC Parks staff and any adverse effects mitigated. The following chart identifies some immediate concerns but does not exclude or support these sites without additional information.

<b>SHA's Proposed Wetland Mitigation Sites</b>		
<b>Site ID</b>	<b>Acres</b>	<b>MNCPPC Comments</b>
<b>RC-1</b>	<b>2.8</b>	Proposed wetland is on a Naval Medical Center base. This requires approval from the Navy prior to considering this a viable suggestion
<b>RC-2</b>	<b>1.2</b>	Proposed wetland area is isolated and is completely surrounded by two roads. Hydrologic connections to the nearest tributary of Rock Creek are not feasible given the amount of impervious cover. Additionally, it too is on a Naval Medical Center base requiring approval from the Navy.
<b>RC-3</b>	<b>0.6</b>	This area is predominately forested with the exception of the area just below the intersection of Beech and Kensington on the eastern side. Field investigation is needed. Forest should not be removed to create wetlands.
<b>RC-5</b>	<b>1.6</b>	Proposed wetland is on an active recreational park area with existing wetlands and forest. The removal of forest for a wetland mitigation project is prohibited. Any proposals must be approved by MNCPPC Parks Department.
<b>RC-6</b>	<b>5.2</b>	This is an existing park with large emergent wetland. Part of the site was a ball field which has reverted back to wetlands as the existing wetlands expand.
<b>RC-7</b>	<b>0.8</b>	Field truthing is needed to confirm opportunity.
<b>RC-8</b>	<b>1.8</b>	Field truthing is needed to confirm opportunity.
<b>RC-9</b>	<b>4.3</b>	The area with hydric soils is forested and not open for wetland mitigation. There is an open area north of the stream valley but does not contain hydric soil. Field investigation is recommended.
<b>RC-10</b>	<b>2.3</b>	Only a portion of the site shows hydric soils. This may be available for mitigation providing the hydrology is there.

4. NRTR: Waters of the United States: Effects: Section 2, page 69: The tables show the total wetland impacts for each alternative route, however it does not identify which wetlands will be affected or what watershed they are in.

- Provide information on each wetland impacted for each alternative route.
  - All proposed mitigation sites are within Rock Creek watershed. According to Section 404 of the CWA compensatory mitigation is preferred in areas within or adjacent to the project alternatives (i.e., on-site compensatory mitigation). If on-site compensatory mitigation is not practicable, off-site mitigation should be undertaken in the same watershed as the affected resource, if possible. MNCPPC staff will consult SHA on selecting potential alternate mitigation sites.
5. NRTR: Terrestrial Habitat: Section 2, page 78-9. The terrestrial habitat includes the existing forests within the 18 mile corridor along the proposed alignments. The forests identified in Montgomery County are those within the larger stream valley corridors including Rock Creek, Sligo Creek, and Northwest Branch. Also mentioned are the ‘smaller patches of green space surrounded by the built environment’ but they are said to be “non-forested”.
- MNCPPC staff requests a breakdown of the acres of forest to be removed in each stream valley.
  - MNCPPC staff requests a breakdown of all acres of “non-forested” trees to be cleared within each stream valley, particularly that which is proposed along the Georgetown Branch Trail.
  - SHA must also comply with the Maryland Reforestation Law and the plans should be submitted to DNR for approval. MNCPPC requests a letter stating compliance with the Maryland Reforestation Law.
6. NRTR: 2.7.2 Wildlife Habitat: Section 2, page 91. In the NRTR, the areas outside of the stream valleys are stated as having limited wildlife use. Although certainly not as rich in diversity and habitat as the stream valleys the Georgetown Branch Trail provides an urban oasis for wildlife that has roamed outside of Rock Creek Park.

**General Comments:**

The DEIS for the Purple Line identified the natural features and resources within the 18 mile corridor. Impacts to the resources as well as conceptual mitigation measures are described. Natural resource impacts are documented in the DEIS in tables and text and identify the total impacts for each natural resource category for each alternative route. However, what is absent from the DEIS is a breakdown of the direct impacts and acres on the natural resources per watershed and/or road segment. This information would enable staff to better understand the impacts in each stream valley which would enhance the evaluation process and the proposed mitigation package.

An example of this is seen in the table below which describes the total impacts along the entire corridor for each transportation alternative.



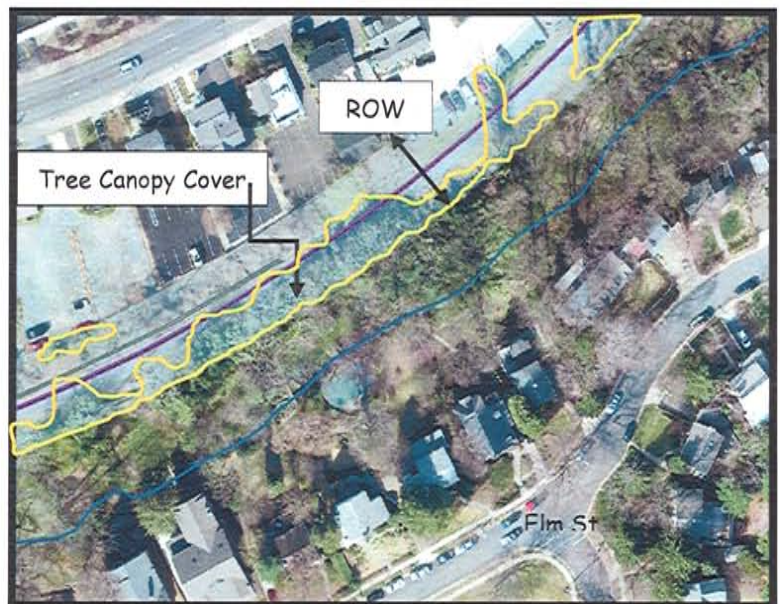
Table 4.10-1: Water Resources and Forest Impacts

Alternative / Maintenance and Storage Site	Wetlands (acres)	Permanent Open Wetlands (acres)	Streams (linear feet)	100-Year Floodplain (acres)	Forests (acres)
Low Investment BRT	0.98	0.20	3,892	14.55	10.70
Medium Investment BRT	1.10	0.20	5,501	13.72	19.89
Medium Investment BRT with Premier Chapel Drive Option	1.09	0.20	5,048	13.46	20.25
High Investment BRT	1.13	0.17	5,717	13.68	21.97
High Investment BRT with Silver Spring Thayer Avenue Option	1.13	0.17	5,719	13.69	24.62
Low Investment LRT	1.11	0.17	4,222	14.19	17.48
Medium Investment LRT	1.35	0.17	5,628	15.11	18.77
Medium Investment LRT with Premier Chapel Drive Option	1.35	0.17	5,217	14.31	19.13
High Investment LRT	1.31	0.17	5,660	13.80	20.32
High Investment LRT with Silver Spring Thayer Avenue Option	1.31	0.17	5,662	13.82	22.96
Glenridge Maintenance Facility	0.03	--	35	--	5.30
Lyonsville Maintenance and Storage Site	--	--	--	--	--

One of the most important oversights of this DEIS is the discussion of the loss of a significant community asset called the Capital Crescent Trail network where impacts will be seen from Bethesda to Silver Spring. The hard-surface trail network is wooded with young and mature trees closing the canopy over the trail. Thousands of citizens use the trail weekly finding respite and calm amongst the dense urban surroundings. The construction of any transitway along this portion of the alignment will result in the loss of all existing trees within the 66' wide corridor. This section of the corridor provides a sense of urban escape and screening for the adjacent homes.

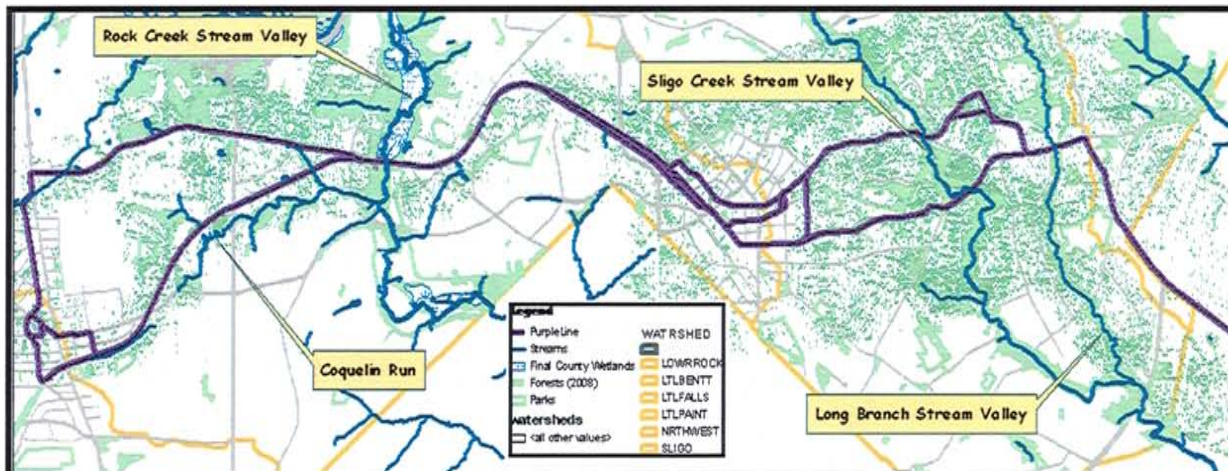
A rough GIS calculation identified approximately 6 acres of individual and clusters of trees growing in the ROW. This does not include the potential impacts on the critical root zones outside of the ROW which may affect additional trees. Approximately 16.6 acres of the ROW has tree canopy cover (including the trees counted above). Canopy cover is the area under the dripline of trees providing shade. The graphic below illustrates a section of the ROW with canopy cover. The exact acreage cannot be determined without a final limit-of-disturbance boundary line and a thorough tree inventory.

The trees lost in the ROW, or due to critical root zone impact, do not count as 'forest' under the state Forest Conservation Law. SHA is not required to reforest or mitigate for loss. However, the FEIS should recognize the importance of this resource and recommend compensation for community tree loss to restore some of the canopy cover. We recommend planting larger canopy trees of varying species ranging in size from 4"-6" dbh. Larger understory and shrub species should also be planted throughout trail network.





## Stream Valley's, Wetlands, Woodlands and Parks



### Air Quality:

The DEIS should provide additional analysis of energy and emissions characteristics of alternative vehicle types and energy sources:

1. An evaluation of potential health-related impacts of mobile source air toxics (MSAT) releases especially on sensitive population sources (schools, hospitals, day-care and elderly housing) along the alignment. The report notes that health-related impacts of MSAT releases could not be predicted because of uncertainties in dispersion modeling and the limits of EPA tools to estimate MSAT emissions.
2. Use of compressed natural gas (CNG) rather than diesel for BRT for comparison with LRT modes. The spot analysis (Tables 2-6 to 2-8) is based on diesel buses which are heavier emitters than CNG buses.
3. Confirmation that the location of sensors along the Purple Line alignment took into consideration the seasonal variability in wind speed and direction. Although the exact positioning is not shown, Figure 2-7 shows air quality sensors located generally along, and in close proximity to the alignment from west to east. This appears to concentrate testing only along the immediate alignment. The report notes that prevailing winds are from the south except in winter when they are from the northwest. Given that wind speed, direction and variability influence the dispersion of atmospheric pollutants, the sensors should be sited so that testing is adequate throughout the study area. This is especially important given the project's use of Gaussian models which assume that the dispersion of pollutants downwind from the pollution source follows a normal distribution from the center of the pollution source. (The study accounts for variation of wind speed and direction by using persistence factor of 0.7 but it is not clear whether this is for daily or seasonal variation in wind speed and direction).

4. An indication of how the report accounted for the cumulative effects of all LRT emissions (including power generation off site). The study's MSAT assessment (Section 2.2.7) is based off regional VMT estimates, and concludes that the project will produce no meaningful regional MSAT effects. It is not clear whether this is a project specific estimate or whether it is for the cumulative effects of Purple Line MSAT emissions plus other emissions from background and other toxics sources e.g. Metro, commuter rail and stationary sources, on the region's air quality.
5. Purple Line emissions of other pollutants e.g. mercury, sulfur (SO<sub>x</sub>), nitrogen oxides (NO<sub>x</sub>) from both the alignment and offsite infrastructure.



December 19, 2008

**MEMORANDUM**

**TO:** Tom Autrey, Transportation Planner/Coordinator  
Move Division

**VIA:** John Carter, Chief *JAC*  
Urban Design and Preservation Division

**FROM:** Margaret K. Rifkin, Urban Designer/Planner Coordinator *MRK*  
Urban Design Section

**SUBJECT:** Purple Line DEIS Alternatives Analysis September 2008

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The Urban Design Section has reviewed the Purple Line Alternatives Analysis to identify and comment on any urban design issues that will be determining factors in the selection of mode and alignment. There are no significant urban design issues that are determining factors at this time for the selection of mode and alignment.

In the next stage, the design of the stations, the right of way of the transitway, and compatibility with the adjacent community must be addressed for the selected alternative. The detailed design issues are summarized in the following:

**Transitway Design**

With any alternative, the character of the Purple Line itself should be addressed. This includes not only landscaping and lighting, but “branding” of the line itself, through design and through graphic images and signs.

**Capital Crescent Trail**

This well-used interim trail is in a setting that has been naturalizing since the abandonment of the original freight line. The impacts of removing trees and installing new lighting should be taken into consideration when a new permanent trail is designed. There should be special attention given to establishing visual themes and providing attractive landscaping compatible with the transit use.

**Station Design**

All stations along the line should be designed for both variety and unity. Unity in design should help to create an identity for the Purple Line. Each station should have some unique elements of its own, that reflect its specific setting and neighborhood. Stations should also be designed to provide good visibility consistent with “Crime Prevention Through Environmental Design” principles. These features should be highlighted in the next stage of design of any alternative. Additional Items for Further Study should include Sector Plans and Design Guidelines for development near station areas.

**Terminal Station in Bethesda**

The design of the terminal station in Bethesda must take into account the design of the “tail track” if LRT is selected. The tail track runs along a popular pedestrian area which includes a theater and other businesses. Future design studies should investigate alternatives for integrating the tail track into this part of Bethesda while maintaining the setting for activity and nightlife.

**Jones Mill Road Alternative**

The Jones Mill Road Bus Rapid Transit alignment should be rejected. The urban design issues include character and pedestrian access to destinations important to neighborhood children, such as the elementary school and a community pool.

**The Golf Course**

The primary urban design issues associated with the private golf course is the visual impact of the Purple Line on patrons of the Country Club. Landscape design alternatives should be developed that take into consideration views from the Country Club.

**The Lyttonsville Station at Brookville Road**

The urban design issues associated with this station primarily concern ensuring good visibility of the station so there is natural surveillance for patrons waiting for transit.

**The Talbot Avenue Bridge**

The urban design issues associated with Talbot Avenue Bridge area concern creating an appropriate separation and buffer between the trail and existing private yards.

**The Falklands**

The impacts on existing and future development are the primary concerns.

**The Metro Plaza**

The urban design issue associated with the Metro Plaza Building concerns the location and character of the Capital Crescent Trail, as well as the visual impact on adjoining properties.

**Silver Spring Transit Center**

The urban design issues associated with the Transit Center concern seamlessly providing direct, pleasant pedestrian access between the Metro station and the Purple Line, while maintaining continuity of the Capital Crescent Trail.

**Library**

The urban design issues associated with the Library and the Purple Line concerns providing direct, pleasant access from the Purple Line. There is also the question of exact station location and design, should a station be added at the new library.

**Wayne Avenue**

Issues concern the dimensions and character of the Silver Spring Green Trail along Wayne Avenue.



**Arliss and Flower Avenue**

The urban design issues concern the specific location of the station and the pedestrian circulation between the station, retail destinations and the Long Branch library.

**Takoma/Langley Area**

The primary urban design issues concerns University Boulevard, particularly the design of the median, its character, and safe and pleasant pedestrian access to transit.

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