

January 12, 2009

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

Subject: Purple Line DEIS – Substantive comments

Dear Ms. Ratcliff:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Ross", is centered on a light-colored rectangular background.

Ben Ross  
President