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Executive Summary
Town of Chevy Chase Purple Line FEIS Comments
October 21, 2013

The Town of Chevy Chase asserts that conducting a Final Environmental Impact Statement (FEIS) at this time is also not appropriate because of 1) fundamental changes in estimated costs for the proposed Purple Line light rail project; and 2) flaws in the FEIS technical analysis that negatively affect the quality of the analysis and related decision making.

Therefore, the Town calls for MTA to perform a new DEIS with consideration of new alternatives or to perform a supplemental DEIS comparing the same alternatives but with corrected cost information and any other new information.

1) Projected Purple Line Costs:

- The estimated costs for the locally preferred alternative (“LPA”) selected in 2009 after MTA’s preparation of the DEIS in 2008 have skyrocketed. At that time, the Town stated, “MTA understates the costs of the Light Rail Transit (LRT) alternatives.” Cost estimates of the LPA have been increasing well beyond the low inflation levels of the past four years.
- In the most recently published annual FTA report, capital costs for the selected light rail project jumped over 10%, by nearly \$200 million between 2011 and 2012. Capital costs have been increasing at this pace since MTA selected the LPA in 2009, with an increase of over \$600 million in the period between 2009 and 2012.
- This significant factual change after the preparation of the DEIS and after the selection of the light rail LPA shows that the comparison of alternatives in the DEIS in 2008 and the selection of the LPA in 2009 were based upon fundamentally inaccurate cost information.
- With the costs currently being cited for the LPA, it is possible the Purple Line light rail option in the FEIS would not have qualified as a reasonable alternative for study in the DEIS under MTA’s own reasoning at that time.

The following table shows available cost estimates between 2007 and 2012:

Date	Estimated Cost In Billions	Source for Estimate
June 2007	Approximately \$1.0	MTA Representative at Town of Chevy Chase Public Meeting
August 2009	\$1.517	Announcement of Locally Preferred Alternative
September 2011	\$1.925	FTA Annual Report
September 2012	\$2.151	FTA Annual Report and FEIS

The following table shows the estimates adjusted to 2012 dollars:

Date	Estimated Cost In Billions
June 2007	Approximately \$1.1 (in 2012 dollars)
August 2009	\$1.62 (in 2012 dollars)
September 2011	\$1.96 (in 2012 dollars)
September 2012	\$2.151

2) Flaws in the Technical Analysis:

The Town of Chevy Chase submitted a response to the Purple Line AA/DEIS in 2008 that highlighted concerns with the MTA's assessment of the environmental impacts that will likely be imposed by the project. The Town of Chevy Chase was *and still is* of the opinion that the AA/DEIS failed to accomplish the following:

- Fully and fairly evaluate the Low Investment BRT alternative, including an accurate quantification of its ridership potential.
- Analyze the environmental impacts associated with each alternative separately and comparably to form a basis for comparison.
- Reasonably estimate the costs and benefits of light rail alternatives.
- Analyze the socio-economic aspects of potential growth, as well as the environmental impacts that such growth may spur.

Today we raise additional technical concerns with the publication of the Purple Line FEIS.

- All design elements of the Preferred Alternative are not presented in the FEIS, and thus the public is not allowed the opportunity to review and comment on all aspects of the proposed action.
- In addition, the FEIS does not allow for full assessment of the Preferred Alternative, as some significant design element modifications have been proposed, and some continue to be proposed since the publication of the FEIS.