



Town Council

Kathy Strom, *Mayor*  
Linna Barnes, *Vice Mayor*  
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David Lublin, *Treasurer*  
Al Lang, *Community Liaison*

February 12, 2010

Mr. Michael Madden  
Project Manager  
Maryland Transit Administration  
6 Saint Paul Street  
Baltimore, MD 21202

Dear Mr. Madden:

The Town of Chevy Chase appreciates your willingness to work with us on mitigating the impact of the Purple Line light rail on the Town, including the relative location of the rail and Trail. You have already been generous with your time, meeting with the Town's Mitigation Advisory Group (MAG) and responding to their information requests.

We have reviewed the *Master Plan Alignment Trail Analysis and Recommendation*, February 5, 2007, prepared by Jacobs Civil Inc. for MTA and the Purple Line *Alternatives Analysis and Draft Environmental Statement (AA/DEIS)*. We consequently believe that both the State and the Town need a more careful analysis of the relative benefits of a north-of-rail Trail alignment versus a south-of-rail Trail alignment along the right-of-way (ROW) adjacent to the Town of Chevy Chase.

When you briefed MAG members in January on MTA's rationale for locating the Trail north of the tracks, you made it clear that the State would reconsider the alignment only if there was "a compelling reason" to do so. The Town of Chevy Chase takes you at your word and respectfully submits not one compelling reason but **six compelling reasons** we believe the State should reconsider the alignment. Because there was never an apple-to-apple comparison done on the alignment alternatives, we believe that the State needs more detailed preliminary engineering of *optimized* alignments of the two cases in order to understand the potential impacts, costs and trade-offs of each.

Here are the six important reasons that we feel warrant another look at the alignment:

1. **Trail experience-** We begin with MTA's primary reason for placing the Trail on the north side – to maximize the vertical and horizontal separation between the Trail and the trackbed, which MTA says would provide a better "trail experience." The decision seems not to be based on specific engineering or cost analyses. MTA says that locating the Trail to the north of the trackbed better

follows the existing elevation of the surrounding land and keeps the Trail three to four feet above the trackbed, where possible.

But it is counterintuitive to locate a recreational trail close to a barren commercial strip instead of alongside a leafy residential community. Many Trail users have contacted the Mitigation Group on this issue, in unanimous agreement that walkers, bikers, baby strollers and leashed dogs all prefer some semblance of the shaded Trail they have enjoyed for years. Only a southern alignment would provide that.

Likewise, the State needs to consider an elevated Trail on the south side rather than a depressed Trail. Major re-grading of the area will occur in any event, so costs should not differ significantly. Sufficient preliminary engineering on both alignments – with the Trail fully optimized and elevated on each alignment – will enable the MTA to more accurately assess where the better Trail experience actually awaits.

- 2. Crossing Safety**– We are critically concerned about students walking to schools north of the ROW from the Town. In addition, Town residents will continue to use the trail to access Metro. Because the ROW is so narrow, walkers approaching from the south will come upon the tracks almost immediately. Having to cross two sets of active tracks from the south to reach the Trail or school has significant safety ramifications, especially in an area where the State acknowledges trains will travel 45 mph every few minutes.

According to former CSX and Amtrak executive Paul H. Reistrup, the reaction time a pedestrian might have to an approaching train is one of the two most critical safety issues associated with planning a trail next to a rail. Locating an elevated Trail to the south would give pedestrians, most of whom cross from the Town, a higher vantage point from which to see and react to approaching trains. Students in particular would have more time to react on dark winter mornings as they walk to school. Later in the day, these mass crossings of students from the north would occur in better light. A thorough review of pedestrians who need to cross the ROW should inform preliminary engineering.

- 3. Visual Impacts** – Locating the tracks south of the Trail will require more extensive retaining walls to support the weight of the transit way, pruning or destruction of more trees outside the ROW on private property, more overhanging wires and track hardware close to residences, more direct line-of-sight of the trains, and more light intrusion at night. However, if the Trail were on the south side and elevated 3 to 4 feet above the track bed, this would create a natural buffer between the homes and the trains and reduce the visual impact on nearby homes. Sufficient preliminary engineering on both the north and south Trail alignment adjacent to Chevy Chase will allow a more thorough analysis of the visual impacts and likely mitigation costs of both alignments.

4. **Noise and Vibration** - The *Noise and Vibration Technical Report* of the AA/DEIS and the information provided to us to date do not support MTA's assertions regarding (new) noise emissions from the trains and (old) ambient noise in the Town. The Town needs sufficient data to understand the noise impacts of the Purple Line, as does MTA. A south Trail alignment would be inherently quieter and is key to mitigating noise and vibration impacts. But we have serious concerns about the State's noise study, and an attachment to this letter details our concerns and recommendations. In brief:

- It appears that MTA understates the Purple Line's noise and vibration levels along the Trail in the Town and mislabels a "severe impact" as a "negligible impact."
- It appears MTA did not take a single sound measurement within the Town of Chevy Chase, but simply assumed the Town is ordinarily as noisy as East-West Highway near the ROW and Jones Bridge Road near Connecticut Avenue.
- It also appears MTA underestimates noise emission from light-rail trains. It counts on the trains being markedly quieter than the manufacturers themselves specify.
- MTA's analysis also appears not to consider the north versus south location of the rails and the train schedule. Nor does it account for all of the ways trains produce noise, including turns and crossovers, braking, decelerating, accelerating, reflections, canyon effects, and focusing effects when entering the tunnel, as well as maintenance of wheels and tracks and the presence of real-world dust/grit/leaves/imperfections.

The Town of Chevy Chase requests that new studies of noise and vibration be conducted using alignments individually optimized for the Trail being north or south of the tracks adjacent to the Town. Calibrated measurements of ambient sound at the Town's northern border (and also at the two places actually measured by the original appendix) need to be taken. The Town will need these noise studies and preliminary engineering details in order to determine the mitigation it will request.

5. **Terrain and Water Runoff** –If the transitway is built nearer the Town, we believe our community will experience greater construction impact, loss of trees and vegetation that serve as natural sound and visual buffers, and possible damage to Coquelin Run and the existing storm water system south of the present Trail.

The north side of the current Trail suffers from runoff water from Bethesda. This problem should not be mitigated by allowing the Trail or the tracks to flood as a buffer. Instead, runoff from Bethesda should be captured before it reaches the Trail or the tracks, regardless of which alignment is chosen.

The Town would like to know how the State plans to handle the additional tons of ground water that will be no longer be absorbed by the 15 acres of trees that will be clear-cut to make way for the Purple Line. This additional runoff should be quantified and plans for its catchment included in preliminary engineering on both the north and south Trail alignment through Chevy Chase.

6. **Access to the Trail and Livability**—MTA has acknowledged that locating the Trail on the north side of the tracks in Chevy Chase would cause Town residents to lose direct access to the Trail and would place the transitway closer to the residences on the south side. Denying an established, 100-years-old community of 1,020 residences direct access to a treasured recreational trail and placing a transitway closer to those residences is hardly in line with the new federal policy of funding major transit projects that make communities better places to live.

In summary, the Town of Chevy Chase believes on the basis of the evidence available to it that the impacts of the Trail on the north side of the ROW will cause greater harm to both Trail users and Town residents. Further, the Town believes that a southern Trail alignment would not alter the workability or functionality of the transitway's overall goals. But because the State did not consider the alignments equally, we have no way of knowing for sure.

**Therefore, the Town requests that sufficient preliminary engineering be completed on both a north and south Trail alignment adjacent to the Town of Chevy Chase — with the Trail fully optimized and elevated on each alignment – to allow a more thorough analysis of the six areas of concern we have outlined. Such engineering can help the State and the Town reach an optimal solution based on solid information about the costs and trade-offs of each alignment. In addition, this information will better inform the specific mitigation measures the Town will ultimately recommend.**

Thank you for your willingness to work with us on this important task that will matter to those who will live here for years to come.

Sincerely,



Kathy Strom  
Mayor, Town of Chevy Chase

cc: Secretary Beverley K. Swaim-Staley  
Congressman Chris Van Hollen  
President Nancy Floreen, Montgomery County Council  
Councilmember Roger Berliner, District 1, Montgomery County Council

Sent via email

February 10, 2010

Mr. Michael Madden  
Project Manager  
Maryland Transit Administration  
[mmadden@mtamaryland.com](mailto:mmadden@mtamaryland.com)

Dear Mike –

The Town's Mitigation Advisory Group has carefully studied the *Noise and Vibration Technical Report* of the AA/DEIS and other information provided to us by the State in the context of the train/trail alignment question. Because so many of the State's conclusions about noise and vibration seem to us to be unsubstantiated or unclear, we ask that the State undertake additional noise studies on both alignments. The following issues illustrate the need for further noise studies:

1. **Not a single sound measurement was taken within the Town of Chevy Chase.** The 60 dB(A) of ambient noise attributed to the Town was synthesized from two uncharacteristic points elsewhere: the intersection of Montgomery Avenue with East-West Highway ("B") and near Connecticut Avenue at the intersection of the Columbia Country Club with Jones Bridge Road ("N-10A"). The interpolation within the Town was justified because of "similar traffic and geographic conditions" that prevail both along the Capital Crescent Trail within the Town and at these two sampled points. We do not believe that this is correct. If measured in accordance with the *FTA Handbook*, ambient day-night Ldn noise in the Town of Chevy Chase would be less than 50 dB(A), not 60.
2. **The 24 hour Ldn values cited for parks are suspiciously loud.** The lowest residential value measured, an Ldn of 53 dB(A), is remarkably high. We therefore have concerns about the calibration of the microphones employed by the contractor providing the noise analysis.
3. **The *Technical Report* appears to assume single-tracking, where MTA assumes double-tracking.** A headway of 6 minutes means 10 trains per hour, not 20 trains per hour. The noise reaching the Town would thereby be +3 dB(A) higher than claimed in the *Technical Report*. Since the noise model has not been available to the Town, we would appreciate your ruling out the possibility of this simple error.
4. **The *Technical Report* confuses a noise mitigation strategy** (walls next to the train) **with eliminating noise *per se*,** ignoring oblique reflections and diffraction from walls, thus understating noise emissions by 4dB(A) and overstating noise suppression by 1 or 2 dB(A).
5. **The *Technical Report* assumes markedly quieter trains than the manufacturers themselves specify.** We could not tell what model and vendor of light rail vehicle was assumed for the source of noise emissions, but noise

levels cited by the report are far lower than light-rail manufacturers (Bombardier FLEXITY, Kawasaki LRV Series 100) provide in their specification data.

6. **The *Technical Report* does not appear to account for noise from** braking, decelerating, accelerating, cross-overs, turning, canyon effects from Bethesda buildings, and focusing effects from entering the tunnel. In aggregate, these emissions will add several decibels unaccounted for in the Technical Report.
7. **The *Technical Report* assumes that trains run down the center of the ROW rather than on a track, which understates noise reaching the Town** by 3 to 4dB(A) if the tracks are aligned South and the Trail North.
8. **The treatment of vibration and low-frequency noise is insufficient.**

We would appreciate your response to these concerns and, even more important, the State's commitment to completing more thorough noise studies on both alignments.

Mary Anne Hoffman  
Chair, Purple Line Mitigation Advisory Group

Pat Burda  
Councilmember