

October 21, 2013

Purple Line FEIS Maryland Transit Administration  
Transit Development & Delivery  
100 S. Charles Street – Tower Two, Suite 700  
Baltimore, MD 21201

## **Comments about the Final Environmental Impact Statement from the Park Hills Civic Association and the Seven Oaks Evanswood Citizens Association, Silver Spring**

### **Overview**

Residents of the Park Hills and Seven Oaks Evanswood sections of Silver Spring and East Silver Spring, totaling about one thousand households, overwhelmingly support mass transit. We feel strongly that if we are to invest a significant sum of public funds to design and build a Purple Line light-rail system, one that will permanently impact our natural and built environment in profound ways, then it needs to be done right. Our response to the Purple Line Final Environmental Impact Statement addresses the following areas of concern:

- Noise and vibration issues
- Visual impacts on local environment
- Traction power substation
- Watershed impacts on Sligo Creek and Federal Clean Water Act Compliance
- Loss of mature tree canopy on Wayne / Impacts to school property
- Future Dale Drive Station
- Pedestrian and traffic safety challenges
- Mitigation during construction activity

For the record, we object to the short timeline for response to the very large, unwieldy and technical Purple Line FEIS. The FEIS introduces a lot of new issues that we have not discussed nor had time to closely review.

Our residential neighborhoods straddle the Wayne Avenue corridor between Fenton Street and Sligo Creek Parkway in Silver Spring. Our residents and patrons and employees of several neighborhood institutions will bear the brunt of the Purple Line's impact. Our neighborhoods, as well as nearby Sligo Branview neighborhood along Wayne Avenue, host the unique stretch of the 16-mile rail line where it is proposed that trains will travel close to front doors of homes in long-established neighborhoods while sharing lanes with cars on a smaller county road. As long-time observers of and participants in the local planning discussions, we are concerned that the high quality of investments are not being made equally across the length of the Purple Line system.

Furthermore, given that portions of Wayne Avenue have been designated "Environmental Justice" areas, we ask that the Maryland Transit Administration do more to significantly reduce

impacts on residents, as well as employ sufficient mitigation measures to offset adverse effects including: noise and vibration, visual “noise” of catenary lines, nuisance of a large power substation in a tight residential area, watershed degradation and loss of verdant hillside on public school property due to road widening, elimination of nearly the entire mature tree canopy, loss of private property and right-of-way green space, vulnerability of upzoning for the residential area adjacent to a proposed station, potential for road traffic to collide with trains, and pedestrian dangers of complex intersections at Dale Drive and Sligo Creek Parkway – particularly for children attending the public middle and elementary schools located on Wayne Avenue.

Given that this proposed light-rail line will be the State of Maryland’s first foray into a significantly single-family residential community, it is in everyone’s interests that the Purple Line serve as a showcase for future light rail projects in sensitive and established neighborhoods. **Park Hills and Seven Oaks Evanswood communities request the MTA establish a working group with residents to meet monthly on design, implementation, construction and operation issues, with oversight of its progress outside of Purple Line staff, as we embark together on building this new transit system in our region.**

## 1. Noise & Vibration Issues

As residents who have attended, and in some cases convened, numerous meetings with the MTA Purple Line project team over the past 7 years, it is disconcerting to learn for the first time with the release of this FEIS in September of 2013, that noise impacts will extend to “500 feet of the planned route, both during construction and once trains began passing by 70 times a day,” as pointed out by the *Washington Post*. It was incumbent upon the State to inform residents of these detrimental impacts far earlier. We have had no time to react.

The same *Washington Post* article also revealed to local residents new details on the construction of the nearby Plymouth tunnel, a process that we are only now told will take 2½ years and one that will involve considerable noise, particularly during the blasting phase.

The FEIS does not document the current noise level in our neighborhood, which is very quiet at night. We are greatly concerned that too little attention was given in the FEIS technical report on the overall problem of noise with which we will have to live for decades; a total of only four sentences to address noise avoidance and minimization – a major quality-of-life issue for the hundreds of Park Hills and Seven Oaks Evanswood residents who live within 500 feet of the Purple Line, to wit:

- Given the steep grade of slope for one half mile on Wayne Avenue, as well as degree of curvature, wheel squeal is inevitable to some degree and a legitimate concern, and that is so identified by MTA. There are measures that can be used to minimize wheel squeal that involve track lubrication (as in [San Diego’s light rail](#), as well as Seattle’s system); however, as pointed out by Gary Erenrich from Montgomery County’s Department of Transportation, “it is unlikely that lubricating systems will be utilized on road surfaces

that involve mixed traffic on a grade." . " That the County has already ruled out one of the only known remedies for wheel squeal known to be effective, and MTA knew for some time that it is ruled out for shared lanes on Wayne, this extremely serious consequence for residents should be addressed in depth in any FEIS but MTA gives it no attention whatsoever. This is engineering, this is environmental impact on thousands of residents, and it is a glaring absence in this FEIS.

- It is discouraging to learn, in an independent assessment from a professional engineering firm, that, (1) "the MTA analysis contains a highly questionable assumed benefit from vehicle skirts" and, (2) "over time, wheels can get 'flat' and tracks can become rough due to 'rolling contact fatigue' - thus, without rigorous maintenance (e.g., wheel 'truing' and rail 'grinding'), light rail noise can increase 5–10 dBA. Continued community attention is reasonable." This same engineer concluded that, "if wheel squeal is properly addressed in the design process and maintained when the system is in operation, wheel squeal is a solvable problem."
- Finally, given that the tracks will be unheated, we are also concerned about the potential need to run the Purple Line continuously through the night during winter so that frozen precipitation does not adversely/prohibitively affect performance.

Our communities request a high level of attention to Purple Line noise; this is a fundamental quality of life issue for our residents. **Park Hills and Seven Oaks Evanswood need special assistance with wheel squeal on Wayne Avenue** - particularly eastbound between Cedar Street and where the road approaches Sligo Creek where braking and negotiating the curves on the downhill will cause severe squeal - **since lubrication of the tracks in mixed traffic is not an option**. Sound barrier walls are also not an option. At the very minimum, the Purple Line will have to travel very slowly through the Wayne Avenue corridor. If the Purple Line is funded through a Public Private Partnership (P3) mechanism, contract requirements must include the rigorous maintenance required to keep wheel noise to a minimum, and specific speed level requirements.

Additional noise from the "future" Dale Drive Station will adversely impact nearby neighbors. At least seventy trains are expected to stop at the station daily on each side, which will add to the noise from train signals and announcements. Special care must be taken to reduce both the sound of announcements, and arrival and departure signals that will impact the single family homes directly adjacent to the station, as well as the hundreds of homes within a half mile radius. **Acceptable noise levels for both the construction and operation of the Purple Line must meet not Federal standards as indicated in the FEIS, but the stricter more realistic standards of Montgomery County. We request a full review of noise mitigation options.**

## **2. Visual Impacts on Local Environment**

MTA categorizes the Wayne Ave corridor a "high impact" area which means the visual impact of the Purple Line and its infrastructure will cause "an extensive change to the visual character" of our neighborhood.

The presence of catenary wires and their extensive supporting infrastructure, including power substations and their concomitant industrial strength, long, and high fencing truck-sized access for maintenance, will significantly degrade the visual environment of our residential, tree canopied, single family detached home neighborhood. Our neighborhoods are in the VAU-4 area in the FEIS.

MTA, after five years of engineering work, does not address, in the FEIS, visual impact mitigation for our high visual impact neighborhood, although it has done visual mitigation work in other sections of the route. Our neighborhoods expect stipulation if there is approval of this FEIS that MTA must remedy the visual impact in this VAU-4 area with comparable investment in budget and skill that it has expended for years in other sectors.

MTA renderings of the Purple Line on Wayne Avenue do not adequately or realistically capture the negative visual impact wrought by the light-rail line and its attendant hardware. We request MTA revisit options for a catenary-free systems like ones that are being employed in Europe and Asia. If a catenary system is used, we would like to see substantial investment by the County and State to minimize the effect of catenary wires.

The following visual impacts have neither been depicted on MTA drawings or maps, nor addressed with specific mitigation plans for residents in any aggregate matter. Most were discovered by residents only on September 7, 2013 when the FEIS volumes were released, and the existence of these items is buried in the data in the voluminous engineering conceptual drawings.

**We urge that MTA is required to create visually accurate visuals depicting Wayne Avenue with the Purple Line and its infrastructure, showing how it will treat and mitigate, for the residences facing Wayne Avenue, the following elements which only appeared publicly in the FEIS fine print:**

- Actual width of Wayne Avenue with Purple Line, showing before and after, when it is all built;
- Where, how many, and what kind of, Catenary Upright Poles and their wires, along residential Wayne Avenue in terms of frequency, color, height, placement;
- Whether catenary wires and new traffic signals are anchored to the sides of the street (in front yards) for the entire residential length of Wayne or are on a high chrome trusses across the street (which would also be anchored in front yards);
- Whether new traffic lights will span Wayne on large and high metallic trusses as happens for the light rail all around Baltimore, but unlike anything in this residential, verdant neighborhood;
- New “retaining walls” all the way along Wayne Avenue which appear in detail on some MTA blueprints but have not been discussed with residents;

- “New Signalized Pedestrian Crosswalks” MTA includes in its FEIS Chapter 4, 4.19.5 for residential Wayne Avenue, but never talked about with residents;
- Unacceptable clear-cutting of the scarce tree canopy along this Environmental Justice area on Wayne Avenue, the “before and after” all the old trees are removed, because – according to some MTA documents -- the MTA will destroy all trees along the route; MTA should revisit the Wayne Avenue route with the County’s ROW arborist and identify trees to save, which is possible with attentive planning;
- Sparse canopy for the next 20 years: MTA has never shown a tree replacement plan, actual heights of replacement trees, if and where they will be planted, plan for replacing those that don’t survive which statistics show are usually about 1 in 3, and what the route will look like in the next few decades, as it will take 15-20 years for any canopy to grow back;
- A half mile of new bright street lights all along residential Wayne resulting in powerful light pollution for residents and the seniors’ residential community that front the street;
- Dark spots where pedestrians are on foot approaching bright stations;
- The before and after plan for Sligo Creek Cabin Park and its trees and the rerouting of Sligo Creek itself;
- Significant change along Wayne Avenue for curbs and storm drainage along Wayne Avenue;
- Treatment of and impact on the more than 45 private driveways along Wayne Avenue;
- Retaining walls on school property and in front of single family homes.

We support the Art in Transit program where appropriate in our neighborhoods. We also urge MTA to work closely with the Montgomery County Planning Department in **redesigning the bridge over Sligo Creek to improve aesthetics that will mark this gateway to Silver Spring and homage to the natural feature of Sligo Creek and Sligo Creek Park.**

### **3. Traction Power Substation Nuisance**

Park Hills and Seven Oaks Evanswood communities strongly urge MTA to move the traction power substation (TPSS) from its proposed site on Wayne Avenue at Cloverfield Road to another less residential location, and to bury that substation.

Given the significant expenditures that MTA is willing to make for other communities along the Purple Line (e.g., the optional [\\$40-50 million overpass](#) at Connecticut Avenue, sound baffling along the Capital Crescent Trail, two golf cart underpasses for the Columbia Country Club), we find the proposal to locate a traction power substation on Wayne Avenue near Cloverfield Road

and “disguise” it with a high wall or “fake house” to be highly inadequate, particularly with respect to this residential area that MTA categorizes as a “design sensitive area.”

We are pleased that County Executive Ike Leggett and our 5<sup>th</sup> District Councilmember Valerie Ervin support residents’ desire to see this power substation relocated and buried. There is a growing movement among planners nationwide that substations and their settings must become more “neighborhood-friendly,” or power substations will never be let into established neighborhoods.

We are encouraged that MTA has engaged the Residential Wayne Avenue Working Group on Purple Line Design – representatives from four adjacent civic associations whose boundaries run along or near Wayne Avenue – on the issue of relocating the power substation. We have been waiting since April 2013 for assessment of power substation location options.

**We endorse the study and recommendations by the Wayne Avenue Working Group on Purple Line Design calling for the traction power substation to be moved from the Cloverfield/Greenbrier location and buried, attached as Appendix 1 to this response.**

#### **4. Watershed Impacts on Sligo Creek and Federal Clean Water Act Compliance**

Given the increased impervious surface due to road widening, as well as the installation of the paved hiker/biker “Green Trail” – in combination with significant loss of tree canopy along the Wayne Avenue corridor (see section below), the Purple Line route through the Sligo Creek watershed must be carefully designed and constructed through close coordination with M-NCPPC Montgomery County Planning Department environmental staff, Department of Environmental Protection, Department of Permitting Services stormwater and sediment control permit review, with oversight and coordination from the Maryland Department of the Environment and Department of Natural Resources in order to fully comply with federal Clean Water Act mandates.

Montgomery County DEP is charged locally with administering the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit Program, an EPA regulatory program administered in Maryland by the Maryland Department of the Environment. The program is intended to reduce and eliminate pollution from rainfall runoff, which flows through storm drain systems to local streams, ponds, and other waterways. Specifically, the goal of the MS4 Permit program is to restore and maintain the chemical, physical, and biological integrity of the nation's waters, as defined in the Clean Water Act, by controlling previously uncontrolled sources of pollution across the landscape that are transported by rainfall runoff or stormwater.

Sligo Creek, in particular, is subject to pollutant loading limits defining maximum amounts of pollutants that it can receive in order to meet water quality standards. **MTA must work with DEP and the Montgomery County Planning Department to assure compliance with federally mandated Total Maximum Daily Loads (TMDLs) allowed under the Clean Water Act. During**

**tunnel construction at Manchester and Wayne, bridge construction over Sligo Creek on Wayne, Best Management Practices and additional measures must be taken to completely control sediment and erosion, as well as restricting the flow of toxins, trash, and other materials that will impair Sligo Creek beyond the TMDLs set by the Environmental Protection Agency (EPA).**

Moving beyond the construction phase, use of “green tracks,” including infiltration under the tracks, in sensitive areas such as Sligo Creek will work to reduce heavy metals, salt, organic molecules, and nutrients from entering the creek.

According to Doug Redmond, Natural Resources Manager for the County’s Department of Parks, the environmental impact of mature tree loss, and their protective shade which helps keep temperatures cooler, can be significant. In addition to the environmental harm caused by the loss of tree canopy, imperviousness is probably the biggest single negative impact on an urban watershed: rainfall tends to run off into streams, with the water being warm and dirty. The good news is that under Maryland’s Stormwater Management Act of 2007, the requirement for stormwater management and sediment control for projects has changed its focus. As a result of the Purple Line project, there will be an opportunity to implement stormwater management practices that are presently absent. Additionally, Park Hills and Seven Oaks Evanswood residents will monitor - under the watchful eye of the County and State, we expect - the relocation of Sligo Creek both 180 feet upstream and downstream of the Wayne Avenue bridge.

We will also be depending on the Maryland Department of Natural Resources to **ensure that MTA’s project plans will comply with the statutory and regulatory requirements of the Maryland Scenic and Wild Rivers Act to assure that the Purple Line will not jeopardize the scenic value of the Sligo Creek stream valley.**

## **5. Loss of Mature Tree Canopy on Wayne / Impacts to School Property**

Park Hills and Seven Oaks Evanswood greatly value our tree canopy for its aesthetics, health benefits, air cleaning, noise absorbing and stormwater management functions.

According to MTA representative Mike Madden in October 2010, MTA had not yet counted the number of trees that would be removed along the Wayne Avenue corridor, stating that the tree inventory would be done during the Preliminary Engineering phase. However, in July 2013 when asked at a community meeting about tree canopy loss, MTA declined to present the inventory. “We would like to present this information to the group at a future meeting,” MTA officials said. Our tree canopy is a major visual characteristic of our neighborhoods. **We urge MTA to start now to implement a local native canopy trees replacement plan to at least partially mitigate what will be a huge loss to our community.**

We are also deeply saddened that the reconfiguration of the parking lot at the Silver Spring International Middle School will result in additional loss of tree canopy – green space that is

enjoyed daily by students, parents, and teachers. Once again, we encourage MTA to release tree removal and replanting plans now to mitigate tree loss on MCPS property, ROW, and private property.

Montgomery County has recently passed legislation reflecting the replacement value of mature trees. We would like to see MTA go beyond required replacement minimums to mitigate for specimen tree loss throughout the ROW and on parkland. MTA, in removing valuable and irreplaceable mature tree canopy, must focus on planting native canopy trees to eventually mitigate that loss. If the Purple Line is funded through a Public Private Partnership (P3) arrangement, the contract requirements must include planting and monitoring of trees over a three year period, until the survivability of each tree is ascertained.

It is important to point out that road widening is only one reason for the loss of trees on Wayne Avenue; the paved hiker/biker "Green Trail" is the other. **The Residential Wayne Avenue working group has introduced the idea to county planners of planting new native canopy trees now, and to also look into planting on private lawns, where owners welcome the idea of hosting a tree. MTA should also fund removal of stumps so as to allow for additional tree planting. We will continue to work with MTA and the County on ways to minimize tree loss along Wayne Avenue.**

## **6. Future Dale Drive Station**

Montgomery County councilmembers affirmed that a station at Dale Drive would not be constructed without "community consensus." Councilmembers did not define "consensus" or establish a method for collecting that consensus. **We urge MTA to work with the Montgomery County Council to fund and collect data that will reflect community support – or a lack thereof - for a Dale Drive Station before determining whether to build that station.**

The Purple Line Functional Master Plan's key features of the Dale Drive Station concept plan include:

- there is no intent or desire to change the zoning in the single-family residential neighborhoods in and around the Wayne Avenue/Dale Drive intersection, if a station is established at this location in the future;
- the station is not included in initial construction phase; the timing of implementation to be determined;
- platform in median of Wayne Avenue; and
- access for walk-up users and persons with disabilities only.

One major downside to the proposed plan is that four stations in quick succession from the Silver Spring Transit Center in the space of only about a mile and a half, combined with the route traveling comingled with traffic along a road with many intersections, residences facing

the train, an elementary and middle school, will negatively impact the speed of the light-rail line.

A much larger downside to the proposed Dale Drive station is that the surrounding residential area would then be vulnerable to upzoning given that, as a current practice, high density around transit stops is desired to maximize both ridership and public investment in a major transit line. We are encouraged by both the County's Purple Line Functional Master Plan and District 5 Councilmember Valerie Ervin's assertion on behalf of County Council that, "there is no intent or desire" to develop the area around the proposed Dale station. Nevertheless, County residents have been given such assurances in the past regarding upzoning, only to see them forgotten. For this reason, the Residential Wayne Avenue working group will continue to work with County Council and Montgomery Planning Department staff to enact protective measures to ensure that the area around Dale and Wayne retains its single-family home residential character.

## **7. Pedestrian & Traffic Safety Challenges**

Wayne Avenue is the only section of the Purple Line where it is proposed that trains will run on the street while sharing lanes with cars. In Park Hills and Seven Oaks Evanswood communities, Wayne Avenue runs for about a half mile from a commercial area in downtown Silver Spring, past single family homes, a multiunit retirement community of nearly 200 active seniors and staff, a public middle school and elementary school, 45 driveways to single family homes, and a very well used county park. Multiple county agencies oversee slices of these issues, but MTA has responsibility for the overall pie and has yet to offer a coordinated presentation of the aggregate pedestrian and traffic safety plan for all of these pieces.

Our first concern is the safety of our children, and the children of neighboring communities who traverse Wayne Avenue to go to school or downtown Silver Spring. Many of the children of Park Hills and Seven Oaks Evanswood, in addition to those from other communities along the Purple Line's route, will cross Purple Line tracks or walk next to the tracks most days of the week while commuting to or from either Sligo Creek Elementary School or Silver Spring International Middle School. The County has suggested "safety fencing" all along the street, but the residents want other options rather than even more walls and hardware in our residential area. **MTA must work with Montgomery County Public Schools (MCPS) to implement a Purple Line safety education program for all children in the two schools in our neighborhood.**

Given the challenge and danger of having to cross the Purple Line, the Green Trail, local buses, and Dale Drive traffic, MCPS recommends consideration of a controlled signal intersection and using the best and most protective pedestrian safety engineering at Wayne Avenue and Dale Drive. Park Hills and Seven Oaks Evanswood residents have also been informed that MTA, in conjunction with Montgomery County Park & Planning and the County Department of Transportation, has developed a working relationship with MCPS and already convened a number of meetings with representatives from both schools to work out various planning challenges related to the Purple Line – such as bus movements before and after school,

automobile traffic at drop-off/pick-up times, and parking space for school staff. Park Hills and Seven Oaks residents are very concerned, however, that sidewalks along both sides of Wayne Avenue be given buffers to prevent pedestrians from being forced to walk immediately next to a widened road carrying vehicular traffic and a light-rail train.

Our communities are also concerned that the FEIS Transportation chapter neglects discussion of physical changes required for safety. We request MTA research and report on the maximum safe speed for the Purple Line on Wayne Avenue by providing data from the experience of other cities where light rail shares lanes, as the Purple Line will pass dozens of street front homes, 45 private driveways, seven neighborhood side streets, several churches, stores, parks, bus stops, schools as discussed above, a multi-unit resident for seniors, on a steeply sloped and curved, highly traveled road. Research is critical to determine a speed safe for sudden braking while traveling downhill on Wayne Avenue with a fully loaded train, in the event a child or out of control cyclist from the bike path suddenly appears in the road. These safety details are not covered in the FEIS.

Park Hills and Seven Oaks Evanswood communities would like to know if State or Federal law requires crossing gates at certain or all intersections, as are used in Baltimore. If crossing gates must be used, what is the noise level, infrastructure footprint, and physical space needed? Will additional traffic signals be installed on Wayne Avenue to better manage cross traffic?

We would like to see a discussion of these pedestrian and traffic safety questions in the FEIS:

- How will MTA manage pedestrian crossings which are now at uncontrolled intersections?
- Specifically, residents and employees of the Springvale Terrace retirement home must access the Ride On bus stop on the east side of Wayne Avenue at Springvale Road. Now, they cross at their peril at a marked but uncontrolled pedestrian crosswalk. How will MTA manage that pedestrian crossing?
- Where will other pedestrian crosswalks be placed on Wayne Avenue and what additional new pedestrian safety technology will be used?
- How does traffic moves if a car, truck or bus breaks down on Wayne Avenue.
- Will there be a system of fast response and removal in place?
- The same applies for trains breaking down. How will those trains be moved, and to where?
- What is the MTA requirement for train operators to hit their "warning clang" when vehicles, bicycles or pedestrians come too close to the train?

With increased traffic jams expected during construction and, at the least, early operation of the Purple Line, MTA must work with MCDOT and the Planning Department to protect the interior streets of single family home neighborhoods on either side of Wayne Avenue from cut-through traffic which is trying to circumvent heavy traffic. New "left turn lanes" may divert traffic off of Wayne Avenue onto Cedar Street and Dale Drive. MTA should work with County

Department of Transportation to assess and propose traffic calming measures such as curb bump outs, speed tables or other devices that will discourage cut through traffic while keeping neighborhood residents and their children safe.

## **8. Mitigation During Construction Activity**

We have the following general comments about the impact of Purple Line construction as they affect the Park Hills and Seven Oaks – Evanswood neighborhoods.

Temporary Construction Activities. We request that MTA use vacant or publicly-owned property, rather than privately-owned and developed property, for temporary construction activities. Moreover, we request that MTA restore properties affected through a temporary easement to an acceptable pre-construction condition following construction activities. We further request that, during construction that MTA provide parking facilities for County, MTA and contractor employees in a location or locations that do not adversely affect the quality of life of our residents.

Community Facilities within the Study Area. With regard to the significant public and private facilities — Sligo Creek Elementary School, Silver Spring International Middle School, Springvale Senior Community, and St. Michael's church — within our neighborhoods, we request that there be regular and timely communication between the project contractor, MTA and other government agencies about any project activities that might adversely impact these facilities, with particular attention to the noise, vibration, traffic and construction impacts of construction activities. We would like to be kept timely informed of plans for the reconstruction of roadways, bicycle lanes, and the addition of new sidewalks

Proposed Staging Areas. With regard to the Proposed Staging Areas, we request that these areas be properties that will be acquired for the project.

Visual Assessment Units (VAU) (4-80). Because the Park Hills – Seven Oaks/Evanswood communities will be highly impacted by the project and as they considered an area of visual sensitivity, we request that the project contractor and the MTA use all means to improve the visual character of the project area, during construction and during project operations. We support the proposed use of the Art-In-Transit program to enhance key elements of the project.

Noise Sources Related to LRT Vehicle Operations (4-107). We request that MTA keep the community informed about its progress towards developing a Bell & Horn Policy for the Purple Line that would impact the Park Hills and Seven Oaks Evanswood communities. We would request a policy that both maximizes safety of our residents and visitors, but one that also takes into account the residential nature of our neighborhoods.

Noise During Construction. We request that MTA require the project contractor to take the following steps to minimize noise and vibration during construction:

- Notify the community of all blasting operations well before the activities commence.
- Schedule blasting or pile driving activities during hours that would least impact residents
- Divert heavy equipment and construction equipment movements away from sensitive receptors by utilizing roadways that contain a limited number of residential or sensitive structures.
- Hire a Blasting Consultant with adequate experience in performing controlled blasting.
- Set vibration limits for blasting
- Monitor the vibration of each blast.
- Conduct test blasts prior to full production blasts.
- Conduct pre-construction survey and post-construction survey in sensitive areas.

With regard to Project Construction (4-109), we urge

- MTA to conduct construction activities ONLY during the daytime
- Conduct truck loading, unloading and hauling operations in a manner that minimizes noise.
- Route construction equipment and other vehicles carrying spoil, concrete, or other materials over routes that would cause the least disturbance to residents in the vicinity of the activity.
- Locate site stationary equipment away from residential areas to the extent reasonably feasible with the site/staging area
- Employ the best available control technologies to limit excessive noise when working near residences.

Hazardous Materials 4.16 (4-134). According to MTA, in addition to impacts resulting from pre-existing contamination in the study area, the operation and the maintenance of the Purple Line could be associated with petroleum releases from the equipment and materials associated with the project. To this end, we request that MTA should release timely and publicly information on hazardous material encountered during construction, as well as information regarding the release of hazardous materials during operations. Moreover, MTA and the project contractor should take all possible means to secure any hazardous materials associated with construction or project operations so that they will not be a danger to the community. The Park Hills/Seven Oaks – Evanswood communities request that they be kept regularly informed about the storage and use of hazardous materials in the Wayne Avenue corridor or anywhere in the project area adjacent to the Park Hills/Seven Oaks-Evanswood communities.

## **Conclusion**

It is important to note that this is the first time MTA is building a light-rail line on shared streets through a single-family residential community. It is our fervent hope that the Purple Line serves as a showplace light-rail system. The Purple Line must be designed and constructed with great care devoted to all of the aesthetic, environmental, traffic calming, safety, noise abatement measures raised in our report. Otherwise, we fear that the Purple Line will result in a degraded Wayne Avenue corridor, which in turn will degrade the quality of life for the many nearby residents. We foresee the construction of other future light-rail projects in similarly sensitive residential areas, and it is critical that Maryland invest enough money, effort, and resources into the Purple Line so that other communities will want to emulate the example in Silver Spring.

Very sincerely yours,

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