



401 9th Street, NW
North Lobby, Suite 500
Washington, DC 20004
Tel 202 482-7200
Fax 202 482-7272
www.ncpc.gov

IN REPLY REFER TO:
NCPC File No. 6884

Ms. Diane Ratcliff
Director
Office of Planning
Maryland Transit Administration
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

**RE: Alternatives Analysis/Draft Environmental Impact Statement and Section 4(f)
Evaluation of the Purple Line**

Dear Ms. Ratcliff:

Thank you for the opportunity to comment on the Alternative Analysis (AA), Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation of the Purple Line. The AA/DEIS comments provided below focus on the National Capital Planning Commission's (NCPC or "the Commission") role as the central planning agency for the federal government in the National Capital Region (NCR). The Commission coordinates all federal planning activities in the region, and has several planning functions: comprehensive planning; project planning; federal project and master plan reviews; and multi-year federal capital improvements planning. Among its major responsibilities are preparing long-range plans and special studies to ensure the effective functioning of the federal government in the NCR; preparing jointly with the District of Columbia government the *Comprehensive Plan for the National Capital*; approving federal master plans and construction proposals in the District of Columbia, as well as reviewing master plans and area plans proposed by state, regional and local agencies for their effect on the federal establishment. We invite you to visit our website, www.ncpc.gov, for additional information.

The Purple Line Build Alternatives are adjacent to or will cross federal land, affect federal facilities and operations, and have other broad impacts on federal interests in the NCR; thus our primary interest is to ensure that the environmental documentation for the Purple Line adequately and appropriately identifies and addresses these topics.

NCPC supports the overall goals of the Purple Line and finds them to be generally consistent with a number of policies of the *Comprehensive Plan for the National Capital: Federal Elements* (Comprehensive Plan), which is available on NCPC's website. NCPC finds that the Purple Line project goals are generally consistent with the *Smart Growth and Sustainable Development Planning Principles* of the Comprehensive Plan. Based on the DEIS alternatives analysis, all the Build Alternatives will improve mobility along the Purple Line corridor. If designed properly, the Purple Line can also mitigate poor air quality, alleviate traffic congestion, and increase access to parkland in the region. Similarly, if land use and transportation development is appropriately planned and linked, it will also support transit-oriented development within the activity centers and link affordable communities to job centers.

Consistent with NEPA requirements, the Purple Line DEIS needs to evaluate how the Build Alternatives support the principles and policies of the *Comprehensive Plan for the National Capital: Federal Elements*, which identify many federal interests. While the DEIS considers compatibility of the Purple Line with the local land use plans of Montgomery County and Prince George's County, it does not consider consistency of the alternatives with the *Comprehensive Plan of the National Capital: Federal Elements*. That analysis should be completed prior to selection of the Preferred Alternative. Consistency with the Comprehensive Plan is also an important consideration in NCPC's review of proposed changes to the General Development Plans for the stream valley parks, discussed below.

NCPC review may be required for this project and should be identified in the analysis.

- The Capper-Cramton Act of May 29, 1930 (46 Stat. 482), authorizes NCPC to formally review any proposed changes to the stream valley parks (see attached Map of Capper-Cramton parks along the Purple Line route) for compliance with its approved plans. The FHA Section 4(f) *de minimis* provisions do not supersede other federal laws over parkland such as the Capper-Cramton Act.
- Any proposed changes to the existing WMATA Metrorail stations will require NCPC review as authorized by the Washington Metropolitan Area Transit Regulation Compact on December 22, 1960, as amended March 29, 1963 [Public Law 774, 80 Stat. 1324, Article IV 14 (c) (3)].
- Several alternatives appear to require use of property on federally-owned facilities with existing NCPC-approved master plans and as such, may require NCPC review.

In addition to NCPC review, because the Build Alternatives will impact federal lands, MTA must coordinate with, submit for review, and/or seek approval from the appropriate federal agencies, including:

- the National Park Service (NPS), for any work involved in the Purple Line crossing the Baltimore-Washington Parkway;
- the U.S. Army Corps of Engineers to acquire Section 404 permit/s for wetlands;

Ms. Diane Ratcliff

Page 3

- the National Institutes of Health (NIH), regarding any use of its property for a Purple Line transit way; and
- the National Naval Military Medical Center (NMMC) regarding any use of its property for a Purple Line transit way.

NCPC urges MTA to coordinate with affected federal agencies. Several of the alternatives may require the support of federal agencies to proceed as proposed. The views of those agencies would be a useful part of the EIS.

To assist you in analyzing the Purple Line alternatives for compatibility with the Comprehensive Plan, we are providing a description of the types of information about Comprehensive Plan consistency that should be included in the EIS, organized around topic areas similar to several of the Federal Elements of the Comprehensive Plan.

Federal Workplaces

As several large federal campuses are immediately adjacent to Build Alternative alignments, the impacts to federal facilities and operations should be clearly identified in the EIS prior to selecting a preferred alternative. Many of these facilities have long-term development or master plans (including transportation plans) that could affect, or be affected by, the Purple Line alternatives. In addition to NPS park properties, NIH and NMMC, the Purple Line will also provide service to the Internal Revenue Service (IRS) Headquarters at the New Carrollton Metrorail station, the National Oceanic and Atmospheric Administration (NOAA) at the Silver Spring Metrorail station and a new station in proximity to the Fort Detrick United States Army Garrison-Forest Glenn Section, which is managed by Fort Detrick.

The Comprehensive Plan notes that appropriate planning and the provision of goods and services can enhance the productivity and operations of federal workplaces. The DEIS should identify the degree to which the various alternatives address the Federal Workplace policies, including proposed actions that can expand the choices of federal employees working in the corridor to a variety of housing, access to goods and services, and non-single-occupancy vehicle travel modes, as well as expand transportation choices for visitors and customers of these facilities. The DEIS should also identify impacts unique to certain alternatives, such as the Build Alternatives that appear to be located on portions of the NMMC and NIH.

Transportation

The Comprehensive Plan “Investment Priorities” section in the Transportation Element specifically identifies transit improvements that increase capacity and serve highly-developed areas in the National Capital Region as priorities for federal funding. The DEIS has clearly identified how the Purple Line will increase transit use and serve the transit-oriented activity centers along the corridor.

Ms. Diane Ratcliff

Page 4

Of the six Build Alternatives, two provide direct service to NIH and the NMMC (and all alternatives improve transit connections to these two sites) while all Build Alternatives provide direct service to the Internal Revenue Service Headquarters, through a stop at the New Carrollton Metrorail station, and the National Oceanic and Atmospheric Administration, through a stop at the Silver Spring Metrorail station. The proximity of the Purple Line to the Fort Detrick United States Army Garrison-Forest Glenn Section may enhance transit use and provide a transit alternative for trips between that facility and NMMC.

The Comprehensive Plan and other federal policies support the location of federal facilities near transit, require federal agencies to develop plans that encourage employee use of transit, and encourage federal employees to use transit or other non-single occupant vehicle trip modes. Federal workers and visitors to federal facilities comprise a key percent of current MetroRail users, and are likely to be significant users of the Purple Line transportation improvements. The various Build Alternatives will likely affect the transportation management plans of the federal agencies along the corridor. These include specific strategies to encourage change in employee travel modes, trip timing, frequency and length, and travel routes so as to reduce traffic congestion and improve air quality. The Build Alternatives that result in a deterioration of travel time on intersections for arterials that serve as main access to federal employment centers could have a negative impact on federal employees' commute times.

The Comprehensive Plan also identifies federal support for multi-modal commuting strategies. Included in some of the Build Alternatives is the development of the Capital Crescent Trail which will provide an ADA-accessible hiker-biker trail connecting to the existing regional trail systems. Walking or biking on the trail may become an alternative travel mode to work for federal employees.

Again, we encourage MTA to coordinate with these federal agencies and to include in the EIS an assessment of how the various alignments and transportation modes compare in providing transportation choices, mobility and convenience to current and future federal workers and federal facility users, and how federal workers and visitors would contribute to Purple Line ridership.

In addition, the routes and transit type of the Build Alternatives at the western end of the Purple Line have varying impacts to the NIH and NMMC. To provide complete information prior to selecting a preferred alternative, the environmental documentation should provide the same level of detailed analyses for all of the alternative variations at the western end of the Purple Line. Lastly, the Build Alternatives maps should label all the streets that are mentioned in the Alternatives discussion. For example, it is unclear how the various alternative routes for the western end of the line will impact the Bethesda CBD because street names are missing on the maps.

Parks and Open Space

The DEIS alternatives will impact various parks and open spaces that are under the planning jurisdiction of NCPC, including several stream valley parks: Rock Creek, the Northwest Branch, Paint Branch and Sligo Creek. *De minimis* impact findings satisfy Section 4(f) only. These federally-transferred properties are subject to the Capper-Cramton Act, which requires NCPC's additional review of revisions to the General Development Plans for the respective stream valley parks and compliance with the Comprehensive Plan.

The Comprehensive Plan calls for the federal government to ensure that Rock Creek Park and its tributary parks continue to serve as important natural resource recreational and cultural areas. The Comprehensive Plan policies also encourage the integration of a regional network of parks, open space, greenways and trails that could improve and increase recreational and commuter opportunities; and link the stream valley parks. The Comprehensive Plan includes four policies for preserving the scenic quality and historic value of parkways that should be addressed in the DEIS. The Baltimore-Washington Parkway, which the National Park Service (NPS) owns, is one of the major parkways in the National Capital Region that has been threatened in the past by visual and physical encroachment. The following information should be provided to clarify the impacts of the Purple Line to park resources.

- a. In the description of the BRT alternatives in Chapter 2, clarify how the Purple Line will cross the Baltimore-Washington Parkway.
- b. In Section 4.4.3 of the DEIS, include NCPC and NPS among the agencies with jurisdiction over the public parklands. It should also include the NCPC review of the Capper-Cramton stream valley parks in the review process for the Purple Line.
- c. Provide a map that shows the location and general width of vegetative buffers proposed along the Purple Line for each of the Build Alternatives.

Federal Environment and Preservation and Historic Features

The DEIS should provide detailed information (see list below) that could inform NCPC and other federal agencies better as to which alternative is most compatible with and supports the federal interests reflected in the Environment Element, and the Preservation and Historic Features Element, of the Comprehensive Plan. The DEIS "Summary of Key Evaluation Measures for Alternatives" notes that the impacts to environmental resources are identical for the No Build, TSM and Build Alternatives. This could not be possible since the No Build and TSM alternatives do not propose transit ways through the stream valley parks or federal lands, nor will these alternatives require any excavation for construction of aerial structures and tunnels, land acquisitions, property displacements and clearing of mature trees, as the Build Alternatives would require in varying degrees. In addition, the Low Investment BRT alternative will involve strip acquisition of NIH property. An archeological site, "Taylor," on the southeast portion of the NIH property could be impacted also. Although identified in Chapter 4 of the DEIS

Ms. Diane Ratcliff
Page 6

(Environmental Resources, Impacts and Mitigation), these impacts to the NIH site should be identified in the “Enhance Environmental Quality” section of the “Summary.”

To assess consistency with Comprehensive Plan policies (which will also be needed for Capper-Cramton review) the following information and analyses should be provided:

- a. For each alternative, provide details on the impact of transit ways, bridge expansions (i.e., Sligo Creek and Baltimore-Washington Parkway), catenary wires, power substations, retaining walls, fences and other required appurtenances for the BRT and LRT on the stream valley parks. These impacts include visual impacts, tree canopy removal, ground disturbance, wildlife, and water quality impacts (water temperatures, erosion and downstream sedimentation). If there are differences in severity and scale of impacts for the BRT and LRT alternatives, these should be clearly described in the environmental analysis.
- b. Provide a detail map of the proposed Capital Crescent trail alignment between Bethesda and Silver Spring that shows clearly how the transit way and hiker-biker trail will traverse Rock Creek Park. Photo simulations of the Purple Line through the natural areas in the stream valley parks should also be provided.
- c. The DEIS concludes that the Purple Line will have minimal impacts to wildlife corridors through the stream valley parks because the alignment follows existing trails. However, the difference between the impact of a hiker-biker trail and a transit way with high speed vehicles traveling in both directions through the wildlife corridors could be significant and should be addressed. Further, as the Purple Line alignments cross several stream valley parks, an assessment of the overall impacts to water resources and wildlife habitat in the stream valley parks should be provided.

We also encourage you to diligently consult with the Maryland State Historic Preservation Office (SHPO) to address the mitigation measures for impacts to historic properties such as the Falkland Apartments and the Columbia Country Club.

We appreciate your consideration of our comments at this stage of environmental review. We look forward to future coordination with the MTA, and would be pleased to provide any further information. Please contact Amy Tarce at (202)482-7241 or amy.tarce@ncpc.gov for further information.

Sincerely,



Julia Koster, AICP
Director, Planning Research and Policy Division

Attachment

cc: Gail McFadden-Roberts, FTA
Peter May, NPS
David Hayes, NPS
Michael McGill, GSA
Ron Wilson, NIH
Jeff Miller, NNMC
Brian Hillis, NNMC
Bill Broglie, NOAA
Raymond Rehrer, Fort Detrick United States Army Garrison-Forest Glenn Section

bcc: David Levy, NCPC
Lois Schiffer, NCPC
Amy Tarce, NCPC
Central File, NCPC