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Testimony of Town of Chevy Chase Councilmember David Lublin
November 18, 2008

Thank you for the opportunity to speak with you about this important issue today. Many others will speak about the need to protect the Trail—vital green space in a rapidly growing area—and the need for public transit. However, I plan to focus on serious concerns that the Town of Chevy Chase has regarding the ridership and cost estimates in the DEIS. As will be outlined in the Town's written submission, these estimates seriously underestimate costs and overestimate ridership for the five options on the Trail. At the same time, MTA has failed to optimize the Jones Bridge Road Bus Rapid Transit alignment despite repeated requests from the Town. Changes clearly need to be made if the EIS is to fulfill the legal requirement to optimize all options and estimate costs and ridership accurately.

First, we remain concerned that the ridership estimates for the five options on the Trail continue to include riders from beyond the half-mile limit in violation of accepted transportation planning standards despite repeated efforts to point out this error by the Town. In response to enquiries, MTA replied that it had adhered to "the model" but this vague answer suggests that it continues to include riders from outside the appropriate catchment area.

Second, the ridership estimates continue to assume a free transfer to Metro and fail to reflect that the cost of the transfer must be borne by either passengers—thus reducing ridership—or by the State—thus increasing operating costs. Again, though the Town has repeatedly pointed out this problem, MTA continues to assume a free transfer even though the WMATA current practice is to charge for intermodal transfers and FTA requires the analysis to reflect the current practice. In addition, the model fails to follow standard industry practice of including time penalties for transfers. Such penalties account for the amount of time it takes to complete a transfer (including wait time) plus the added inconvenience and anxiety associated with transferring.

Third, there are two significant costs to be borne by the County which appear to be outside the Purple Line cost estimates, raising questions as to the true costs of the Purple Line. One is the \$60 million southern elevator connection at Bethesda Metro. MTA fails to include costs for the elevator in its budget for the master plan light-rail options and it is unclear what credit the County will get for providing this needed amenity. Yet, the costs to put a new Metro connection at National Naval Medical Center are included in that alignments' budget pushing the costs of the Jones Bridge Road option up. The other is the cost for building the Trail – we've heard estimates between \$12-14 million—which the DEIS states will be borne by the County. Those costs are not easily isolated in the Purple Line budget and it is unclear if the estimated costs include the many long ramps, grading, retaining walls and landscaping in their analysis. The EIS should contain an accurate estimate of costs and benefits and the County should know exactly what it is committing to.

Despite MTA's best efforts to produce favorable numbers for the light rail options on the trail, these options remain like horses which barely qualify for a race and have little chance of finishing in the money—or receiving federal funds. If we really want to move the Purple Line forward, MTA and the EIS need to take a more serious look at the Jones Bridge Road option and to optimize it correctly. The projected growth of the Woodmont Triangle, the BRAC process, and the enormous growth of the National Naval Medical Center make this imperative.

MTA has repeatedly explained that it has relied on the accepted Council of Governments model in estimating ridership. However, MTA has amazingly relied on a pre-BRAC version of this model. If the changes caused by BRAC were minor, this wouldn't matter much. However, BRAC is going to produce enormous increases in traffic. The Purple Line is an ideal opportunity to address this problem by providing a one-seat ride to Medical Center and Bethesda.

Yet, MTA has not optimized this option. Unbelievably, MTA's estimates have the supposedly optimized version of Bus Rapid Transit on Jones Bridge Road running at a slower speed than the slowest local bus on the same road today. MTA also has not done a reasonable study of traffic signal priority for this alternative, which is a key feature of Bus Rapid Transit. Moreover, MTA still has this option taking a slower path than any of the other options east of Jones Mill Road.

Finally, the DEIS repeatedly states that the Trail was purchased as a "transitway" and in the Master Plan. Reality is far cloudier. The formerly little-used train right-of-way was purchased as part of the "Rails to Trails" program. The Montgomery County Master Plan calls for a one-lane trolley—not the two-lane light rail proposed by the Purple Line. And the \$10 million used to purchase the Trail includes the segments now part of the Capital Crescent Trail between Bethesda and DC. Does MTA claim that this portion of the Trail is also reserved for a future light rail network as well?

Thanks again for providing myself and the Town the opportunity to participate in this process. Instead of promoting an option which wrecks two parks—the Capital Crescent Trail and Woodmont Plaza—for the price of one light rail, the EIS needs to reexamine the Jones Bridge Road Bus Rapid Transit option so that we can get two transit lines—the Purple Line and Corridor Cities Transitway—for the price of one.