



July 9, 2014

Mr. Henry Kay, Executive Director for Transit Development and Delivery
Mr. Robert L. Smith, Administrator and CEO
Maryland Transit Administration
100 South Charles Street
Tower 2, Suite 700
Baltimore, MD 21201

Dear Mr. Kay and Mr. Smith

Regarding the Purple Line transit project, we have serious concerns about the totally inadequate effort so far to plan for mitigation of stormwater as it impacts the Sligo Creek/ Anacostia watershed. As it certainly will be more expensive and unlikely that adequate steps will be taken at some date after completion of the Purple Line in Silver Spring and environs, the time to address storm water mitigation is now.

Friends of Sligo Creek, Audubon Naturalist Society, Anacostia Watershed Society, and Neighbors of the Northwest Branch are deeply concerned that public plans from the Maryland Transit Administration (MTA) to accommodate the Purple Line show that the upcoming Purple Line redevelopment of roads that drain into Sligo Creek captures only a minimal portion of the resultant stormwater. The vast majority of pollutants and detritus, as well as the sheer quantity of water that is required to be treated by federal, state and county law, would go untreated. It is imperative that MTA plan for and commit to following Montgomery County's Stormwater Management Criteria (Montgomery County Code Section 19-26) for redevelopment. This code section requires capture and infiltration as the first priority, and effective stormwater management whether on-site or off-site, for all the impervious surfaces related to a given project. MTA must take its specific guidance in water quality and forest protection in this effort from the Montgomery County Department of Environmental Protection (DEP) and Montgomery Park and Planning staff (MNCPPC).

Specifically, there are several different areas of the Purple Line Project where stormwater would be inadequately treated according to your current design plans. According to MTA public documents, on Wayne Avenue approaching Sligo Creek from the west (and ending in an outfall pipe called POI 56), there are 13 acres of impervious surface which carry stormwater to Sligo Creek, including the roadbed and Purple Line, which are being redeveloped. Rather than treat a one-inch an hour flow of all 13 acres, the MTA proposes only to treat 1.04 acres of that area mostly using tree boxes. On the east side, in the vicinity of Manchester Rd, of the 6 acres of impervious surface (directed to outfall POI 58), only 1.1 acres are being treated. In the Long Branch creek area near the Piney Branch Road crossing, of 7.3 acres of impervious surface, only 0.7 acres are being treated (this is associated with POI 61). Long Branch downstream from this area already is in a highly compromised condition. By virtually ignoring the mandate for the Long Branch area, the Purple Line project will exacerbate the creek's degraded conditions precisely at the time they should be improved.

As you may know, Friends of Sligo Creek (FOSC) is an all-volunteer organization dedicated to protecting, enhancing, and enjoying the ecological health of Sligo Creek Park and the wider watershed. Despite long-term damage from urbanization, the Creek has rebounded in the last fifteen years, thanks

to informed, time-consuming, and expensive efforts by the County, MNCPPC, and citizen groups including FOSC along with allies including Audubon Naturalist Society, Anacostia Watershed Society and Neighbors of Northwest Branch. The beauty, water quality, forest cover, and wildlife habitat of the Park will continue to improve with concerted efforts by all parties. Please see the FOSC website: www.fosc.org.

The entire Chesapeake region has mobilized as never before to capture and treat stormwater. Montgomery County is under stringent mandates in particular for redevelopment and new developments to effectively follow these laws and plans. The same holds for Prince George's County, which has committed its residents and businesses to pay \$1.2 billion for local stormwater infrastructure installations in the next 10 years. These projects should not have to mitigate state work on the Purple Line that does not come close to best practices. Consequently, the Purple Line project needs to incorporate and completely address these requirements in the construction process along the full extent of the project. Afterwards will be too late. County staff from the Montgomery Parks Department and the Department of Environmental Protection have registered their concerns in the Purple Line public comments repository, carefully outlining current shortcomings in the Purple Line plan as regards our down county creeks including Sligo Creek. In addition, FOSC and Audubon Naturalist Society have written and testified in support of the comprehensive stormwater program for the Purple Line project articulated by MNCPPC.

While this letter is not the place to make recommendations on how specifically to address stormwater, we urge you to adopt recommendations by experts in MNCPPC and the County Department of Environmental Protection. From many years of working with them, we appreciate that they know the watershed very well and have taken many useful actions to protect the creek. These include, for example, significant and widespread efforts to facilitate contract for and create bioswales, reforestation, porous surfaces and bioretention, as well as more elaborate underground projects.

No project of this size should ignore or worsen efforts of the major County initiative to comply with requirements of the federal Clean Water Act. The best and most comprehensive guidelines should prevail.

Thank you for your consideration of our concerns and efforts.

Kit Gage, President
Friends of Sligo Creek

Diane Cameron
Conservation Program Director
Audubon Naturalist Society

Dan Smith
Public Policy and Advocacy Director
Anacostia Watershed Society

James Graham, President
Neighbors of Northwest Branch, Anacostia River

cc: Governor O'Malley
Frank Dawson, Chair, Anacostia Watershed Partnership, c/o MCOG
Anacostia Watershed Citizens Advisory Committee