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SCMAGLEV Project
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Re: **Baltimore-Washington Superconducting Magnetic Levitation (SCMAGLEV) Project
Comments on the Draft Environmental Impact Statement**

Dear Ms. Thorne and Mr. Bratcher:

Thank you for the opportunity to review the *Baltimore-Washington Superconducting MAGLEV (SCMAGLEV) Draft Environmental Impact Statement (DEIS)* distributed January 15, 2021. The Maryland-National Capital Park and Planning Commission (M-NCPPC) has compiled their list of comments for your consideration. We have endeavored to provide a level of detail in our comments to make them as substantive and relevant as possible. The major issues identified in our comments may be summarized as follows:

Communities

- The proposed alignments will traverse areas including established residential neighborhoods and parks impacting both human and wildlife communities. Likely impacts, include noise, vibration, loss of woodland, loss of recreational amenities, truck traffic, and local roadway damage. These are not minor and must be taken into account if the project moves forward. Avoidance, minimization, and mitigation have not been fully described in the DEIS. More detail is necessary.

- The proposed alignments bisect critical community resources in a manner that raises considerable environmental justice concerns. The DEIS fails to adequately address these concerns in any meaningful detail. An example of this is the proposal to remove the pedestrian bridge over the Baltimore Washington Parkway (BWP) linking old and new sections of the City of Greenbelt. The bridge was constructed to mitigate the impact of the Parkway, i.e., cutting an established community in half, however both of the proposed alignments would require the removal of the bridge with no identified plan to mitigate this impact. The history of the bridge and its purpose are not discussed in the DEIS and therefore the full importance of the bridge is neither acknowledged nor analyzed with respect to community cohesion. There are other examples of a failure to acknowledge the historic inequities or background of areas impacted by the proposed alignments, and the consequent failure to propose avoidance, minimization, or mitigation techniques.
- Negative property valuations caused by adverse impacts such as noise, vibration, and visual proximity to the tunneling, related infrastructure and viaduct “elevated” guideway have not been studied and appear to be overlooked in the DEIS.

Fresh Air/Emergency Egress (FA/EE)

- The proposed alignments travel through, and the siting of FA/EE facilities would occur in, two communities identified by Prince George’s County’s Transforming Neighborhoods Initiative as facing “significant economic, health, public safety, and educational challenges,” notably Colmar Manor and East Riverdale/Bladensburg. The area of Bladensburg designated for a potential FA/EE facility is an established community residential neighborhood surrounded by a concentration of the region’s heavy and light industrial and utility facilities. Residents in these neighborhoods already bear a disproportionate share of the region’s industrial traffic and other locally undesirable land uses. As such, their sensitivity to, and ability to withstand, environmental impacts should be considered. The FA/EE is also proposed to be 5 stories high and located adjacent to the Bladensburg Waterfront Park. The resulting noise, vibration (during construction) and visual impacts are potentially significant and yet no detailed discussion of avoidance, minimization or mitigation is included in the DEIS.
- We are concerned about potential tunneling impacts to the Anacostia River and the Bladensburg Waterfront Park. M-NCPPC has spent a significant amount of money on improvements to this park and facilities.
- The FA/EE facilities will operate as staging areas and shaft entrance for the tunnel boring machines during construction. Noise, truck traffic, dust, and visual impacts of this 24-hour, 7-day per week operation will be significant and constant for a period of years. Labeling these impacts “minor” and “temporary” minimizes the disruption that will be caused.

Environmental

- The Beltsville Agricultural Research Center (BARC) is located in a designated Priority Preservation Area (PPA) of Prince George’s County. As such, the proposed Trainset Maintenance Facility (TMF) should only be located on BARC property if there is no other reasonable alternative. The DEIS does not make the case that there is no other reasonable alternative to a location on BARC property, and it fails to provide evidence that avoidance, minimization, and mitigation have been seriously considered.

- Proposed impacts to the Patuxent Research Refuge (PRR) would be extensive under both alignments. This is particularly concerning. The placement of a TMF on the edge of the PRR would result in forest fragmentation and the disturbance of a continuous block of multi-layer and high functioning habitat. The result will be the loss of very valuable combination of environmental resources which is becoming harder to find in Maryland, and it could also spur development which we are not in favor of. The DEIS fails to provide evidence that avoidance, minimization, and mitigation have been considered.
- Both proposed BARC and TMF locations would have significant detrimental impacts to Rare, Threatened and Endangered (RTE) and Forest Interior Dwelling (FID) Species. The DEIS fails to set forth any plans to avoid, minimize or mitigate the loss of these species and habitat that may turn out to be irreplaceable.

Parkland

- Springfield Road Community Park is owned by M-NCPPC. This property was transferred to M-NCPPC from the National Park Service (NPS) to provide a 100-foot buffer along the Baltimore-Washington Parkway (BWP) and to provide for the future expansion of the parkway. Any other use of this property, as proposed, would require NPS approval as well as a finding by the Commission that the property is no longer needed and could be replaced with as good or better parkland. The DEIS fails to note these requirements which will add time and costs to the project's balance sheet. Additionally, a Maintenance of Way (MOW) facility is proposed for this location, resulting in an industrial use located in the backyard of approximately 16 single-family homes. Even if the NPS approves the change of use, and if the Commission could make the statutory findings, this appears to be a particularly inappropriate placement for this facility due to its proximity to single-family homes.
- Other parkland impacts are noted in the DEIS as "minor" or "no" impact. This is a conclusion with which we disagree. For example, the proposed construction of a power substation adjacent to the South Laurel Neighborhood Park may not impact the footprint of the park, but it will certainly impact the environmental setting and usability of a park that is designed for young children. Additional information is needed to fully determine parkland impacts.

Transportation

- Ridership projections in the DEIS appears to be unreasonably optimistic and are mainly based upon assumptions that ridership will be siphoned from AMTRAK and MARC. Among the many problems with these assumptions are that both AMTRAK and MARC are publicly funded or heavily subsidized with public funds. Substituting accessible, affordable regional train service with inaccessible, relatively expensive service and using public funds to do so seems illogical. Development of a new technology, rather than upgrading the old, that presupposes the demise of the old, may have much higher negative economic impact than the DEIS describes. Many such indirect costs are not analyzed or even noted in the DEIS.
- The proposal to transport 23+ million cubic yards of spoil over local roads and regional highways is ill-advised for any number of reasons. We have previously recommended and continue to support that spoils from this project be transported by rail. The cost of facilities to support rail transport of spoil material, including, but not limited to, construction of a temporary siding, should be factored into the design and potential impact of this project. A rail loading facility is preferable to truck transport of spoil material. Additional and serious consideration should be

given to the noise, dust, and traffic impacts of 24-hour spoils removal and transport to and through communities surrounding FA/EE locations and haul routes.

As proposed, the SCMAGLEV alignments and related facilities will have significant negative impacts upon Prince George's County. However, Prince George's County residents will not share in the economic or transportation benefits of the project because there is no station planned in the County. Further the DEIS fails to adequately address negative impacts on the County's economy. These are major concerns.

In closing, we are happy to meet with your project team to discuss our comments in greater detail. Please contact Ms. Crystal Saunders Hancock, she can be reached at 301-952-3634 or Crystal.Hancock@ppd.mncppc.org.

Sincerely,

Elizabeth Hewlett
Chairman

Enclosure

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