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Wetlands and Waterways Protection Program
Water and Science Administration
Maryland Department of the Environment
1800 Washington Boulevard, Suite 430
Baltimore, MD 21230

12 November 2023

Re: Comments on the BWRR SCMAGLEV Project's Water Quality Certification Application

Dear Ms. Spendiff,

I strongly recommend that the Maryland Department of the Environment (MDE) **not** certify this project because its costs simply do not outweigh the benefits, even if they were *remotely* near what the SCMAGLEV is imagined to deliver. Besides being a resident of South Laurel, I am a strong supporter of the Maryland Coalition for Responsible Transit (MCRT) because it has dug deeper than the SCMAGLEV proponents into the (inadequate) science behind the claims and vague promises about the project's alleged benefits versus its potential impact on the environment, the economy, the neighborhoods, and ultimately all Marylanders. As but one example, the BWRR's Water Quality Certification (WQC) application suggests the BWRR is *still* not making a serious effort to do its homework.

- Having read the Maryland Coalition for Responsible Transit's (MCRT) 395-page response to the DEIS, I agree with the MCRT that the answer should be "no," based on the BWRR's continuing reliance on extremely vague answers and lack of detail and supportive data to "substantiate" the benefits being claimed.
- The SCMAGLEV design is based on new technology that has no detailed, appropriate safety regulations and standards for this technology. And we are supposed to wait until it is constructed to determine them? What happened to "safety first"?
- The SCMAGLEV project will not deliver the promised financial benefits, nor will it be "green," by any stretch of the imagination.
- This project will decimate our waterways, water supply, environment, and affect numerous environmental justice communities as well as other communities along its route.
- There is a sewage treatment plant in Laurel that is near the path of the SCMAGLEV project, depending on the track the project takes. Does that even make sense?
- It will be a huge money pit for the State and at best, end up as a train to nowhere, while high-end earners leave P.G. County in particular, and Maryland in general.
- We have a solution: support Amtrak and the MARC, as a complement to the VRE.

Dodging the Question

I'm sure you noticed that BWRR included no concrete statements on HOW the project will meet requirements for the Water Quality Certification. "Best management practices," are not defined, yet the miracle will happen AFTER "the layout has been more developed" ...seriously? How can a certification be approved without specific information and detailed plans? BWRR must think you won't know the difference between hard data and vague generalities, or won't notice BWRR is pushing something down the road to a magical future, but I *cannot* believe that you won't see through this.

SAFETY Should be the First Priority: Safety Certification Planned for AFTER Construction Starts?

The technology is untested. This technology is not in full-time commercial operation anywhere in the world; in fact, it is currently being tested in one location in Japan. It is commercially unproven technology for which the U.S. has no safety standards. SCMAGLEV train safety certification, referred to as the **Rule of Particular Applicability**, is not planned for completion **until after construction starts**. In Appendix G, Part 3, page 4, the project's Draft Environmental Impact Statement states: "Construction can proceed

prior to the completion of the Rule of Particular Applicability (RPA), but operation cannot commence without it.”

*Not having the safety regulations worked out prior to construction design makes no sense. Would you buy a house under these conditions, would you want your children in a school that didn't define the safety criteria before construction started? Clearly this would have deeper impacts on the environment than what is represented in the current application material. This is why allowing construction to start prior to safety certification is contrary to the U.S. Department of Transportation policy as written in its 2020 report, "Pathways to the Future of Transportation," which states that **safety should be the first priority**. Please do not let BWRR and the Japan financiers use Maryland as a guinea pig.*

Environmental Justice

If this aspect is something you are concerned about – 80% of the parcels impacted by land use conversion, rezoning, etc. are in environmental justice (EJ) communities. Nearly all the project ancillary facilities (those located above ground) are located within the EJ population areas (e.g., stations, viaducts, tunnel portals). Most of the frequent and severe noise and vibration impacts will occur in EJ communities. Air pollution will worsen around stations due to increased traffic and potentially harmful emissions from ventilation facilities. Permanent and unrecoverable impacts to recreational facilities and parklands will occur if building the SCMAGLEV project is approved.

INCREASED Emissions – Not “Reduced”

NASA's Dr. Owen Kelley has disproven any benefit BWRR claims will result from removing cars from the road, in fact the DEIS shows that SCMAGLEV would actually increase regional transportation energy consumption by 39% — enough energy to power 88,900 homes. While SCMAGLEV may be 25% more efficient than auto travel, it is *37% percent less efficient than existing bus service and 20% less efficient than existing passenger rail*. In total, **SCMAGLEV operation would increase net carbon dioxide emissions from 286 to 336 million kilograms per year** compared to maintaining existing options.”

Loss of Green Space

Former Senator Paul Sarbanes called the Green Corridor (Greenbelt Park, Greenbelt Forest Preserve, Beltsville Agricultural Research Center, the Patuxent Research Refuge) the “**Lungs of Maryland**.” In addition, there are a number of community green spaces along the route especially on either side of the BW Parkway all the way from D.C. to Baltimore. Please don't let SCMAGLEV take our lungs away.

One other concern about the route through Laurel - near the Rt 197 exit, there is a sewage treatment plant on the eastern side of the Parkway that the SCMAGLEV project will run near if the eastern path is chosen. Does that even make sense? That is right up there with the disturbances it will cause at NASA, the Secret Service Training Center, NSA, Fort Meade, and the Beltsville Agricultural Center. These people have science, computer, and other technical skills that can be put to use throughout the country.

Ridership

The financial success of operating and maintaining the SCMAGLEV is clearly based on ridership. However, we have not seen any ridership analyses, modeling, assumptions used, data, and findings that support their statements.

BWRR projects between 11.4 to 12.6 million passengers annually. How is this possible, when the MARC, operating three train lines in Maryland with a pre-COVID ridership peak at just over 9 million riders, and Amtrak have over 800,000 riders between Baltimore and Washington, D.C.? Since COVID, many more people continue to work from home. Currently, MARC ridership is still down by 11,800 passengers per workday. Amtrak is experiencing similar numbers, still down about 40 percent.

Baltimore's population continues to shrink, down 8.2 percent since 2010. Further, *high-end earners are leaving both Baltimore and Washington, D.C.* The *Maryland Daily Record* reported that Maryland is among the states with the highest loss of high-earning residents. WTOP radio reported that Washington, D.C., lost high end earners faster than any other state. So, the SCMAGLEV train ridership, already inflated, is losing its ridership base, and will drive others to move out of its way.

Not Worth the Cost – Support Amtrak and the MARC

BWRR's statement of purpose is: "The purpose of the SCMAGLEV Project is to evaluate, and ultimately construct and operate, a safe, revenue producing, high-speed ground transportation system that achieves the optimum operating speed of the SCMAGLEV technology to significantly reduce travel time in order to meet the capacity and ridership needs of the Baltimore-Washington region."

Yes, there is a real need for a fast, reliable, and low-cost link between Baltimore and Washington, D.C. And *we already have two alternatives to this project that are already here and are operating*—Amtrak and the MARC—which currently operate at a fraction of the projected SCMAGLEV cost. Amtrak and the MARC also provide jobs and career opportunities, which should increase with the planned improvements under way. Continuing to upgrade and enhance the integrated Amtrak, the MARC, and VRE systems is a far better choice than building a standalone SCMAGLEV at an exorbitant price.

Please do not let BWRR and their financiers use Marylanders as a guinea pig. Don't let them railroad us!! Stop this train, PLEASE!!

Thank you,

Deborah Barrett

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Secretary, Montpelier Homeowners Association