



CITY OF NEW CARROLLTON

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October 16, 2023

Maryland Department of the Environment
Attn: Danielle A. Spendiff
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Water & Science Administration
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Subject: Request 30-Day Extension to the Comment Period for Review of the BWRR SCMaglev Project's Water Quality Certification Application [Extension from Current November 2, 2023 Deadline].

On behalf of the residents of the City of New Carrollton we are organized for the purpose of encouraging public participation in the development of current and future transit proposals by ensuring they are evaluated for economic viability, social and environmental impact, and community accessibility.

We are writing regarding the November 2, 2023, deadline for public comment on the Maryland Department of the Environment's (MDE) Baltimore-Washington Rapid Rail (BWRR) Clean Water Act, Section 401 Water Quality Certification (WQC) for the building of the Baltimore-to-Washington Superconducting Magnetic Levitation (SCMaglev) train. We ask the MDE to extend the current 60-day public comment period to a total of 90 days, with the new comment period ending on December 2, 2023.

BWRR's extremely complex Section 401 WQC Request & Related Documents dated February 7, 2023 (Joint Permit Application v. March 2021) (Nontidal Wetlands Permit Application No: 20-NT-1398, Tidal Wetlands License Application No. 20-WL-1574) was provided to the MCRT via a Public Information Act request. These documents total thousands of pages.

The SCMaglev train project is an enormous undertaking in complexity, cost, and scope. We anticipate that the following issues will arise in the review of BWRR's WQC project justification materials.

- Current SCMaglev train design will present safety problems, including the potential for accidents due to the lack of detailed and appropriate safety

regulations and standards for this technology. The technology is not in commercial operation anywhere in the world; rather, it is currently being tested in one location in Japan. The nature of the technology, as well as trial results from operations in Japan, as described in the WQC justification materials and in the SCMaglev Draft Environmental Impact Statement (DEIS), must be closely scrutinized, and the safety concerns documented.

1 Maryland Department of the Environment notice dated August 25, 2023.

- Detailed ridership study data and ridership figures provided by BWRR thus far appear to be inflated. The Federal Railroad Administration provided only partial, redacted reports in response to a Freedom of Information Act request by the MCRT, and these need to be thoroughly analyzed and verified.
- The above issue is particularly important considering the construction cost overruns and the legitimate skepticism from Maryland residents about BWRR's financial claims. U.S. and international experience with high-speed rail, especially maglev-technology-based train systems, must be carefully considered and should weigh heavily in any WQC decision by the MDE.
- Social/environmental justice assessments are not comprehensive. The MCRT and other organizations have identified a long list of concerns and impacts to Black and Brown majority-minority communities that need to be addressed before the MDE considers approving a BWRRWQC.
- The inclusion of the Beltsville Agricultural Research Center (BARC) as a potential train maintenance facility and the public-to-private transfer of land that will result in irreparable damage to research studies and precious wildlife due to the massive construction in a currently unbroken environment will need to be studied, addressed, and clearly justified to the public.
- Cumulative impacts of the proposed SCMaglev project and the Department of the Treasury's Bureau of Engraving and Printing's final plan for a Currency Production Facility on BARC will impact the same Tier II waters the BWRR application addresses. The combination of these two projects' impacts on Tier II waters needs to be assessed and publicized, allowing the public sufficient time to comment.

- Additional time is needed to fully research transportation alternatives and compare the current and planned enhancements being developed and implemented by Amtrak and MARC in contrast with the promises made by BWRR in seeking to gain approval for building the SCMaglev train.

For these reasons, we ask the MDE to extend the public comment period for the BWRR WQC from 60 to 90 days (from November 2 to December 2) to ensure genuine public access, broad awareness of the process, and clarification of current questions and missing data, as well as to promote and encourage serious public engagement addressing the issues raised.

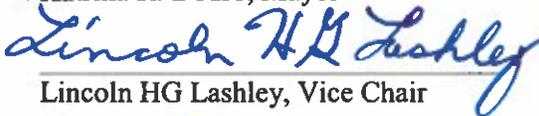
We anticipate your timely response and thank you for your serious attention to this urgent matter that greatly affects Marylanders.

Sincerely,

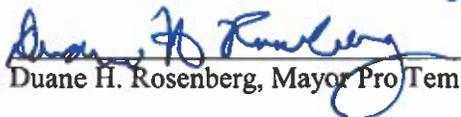
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