



*The Town of Landover Hills
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October 23, 2023

Maryland Department of the Environment
Attn: Danielle A. Spendiff
Chief, Regulatory & Customer Service
Division Water & Science Administration
1800 Washington Boulevard
Baltimore, Maryland 21230

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]

As the Mayor and Council of the Town of Landover Hills, we are writing regarding the Nov. 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 Dec. 2, 2023.

The SCMAGLEV project is an enormous undertaking in complexity, cost, and scope. The communities, including Landover Hills, along the SCMAGLEV route will be adversely affected by the project, particularly during construction but also for the life of the project with effects from noise, vibration and electromagnetic effects, as well as impacts to air and water quality, alternative transportation options and potential electrical rate hikes.


We anticipate that many of the issues that we detailed in our response to the SCMAGLEV Draft Environmental Impact Statement (DEIS) also will arise in the review of BWRR's WQC project justification materials. These include:


- 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 nature of the technology, as well as trial results from operations in Japan, as described in the WQC justification materials and in the SCMAGLEV DEIS, must be closely scrutinized, and the safety concerns documented.
- Detailed ridership study data and ridership figures provided by BWRR thus far appear to be inflated but also indicate that its potential impact on MARC and Amtrak could be devastating. According to the DEIS SCMAGLEV's ridership estimate for 2030 is based on about a 60 percent diversion of riders from Amtrak and MARC and one of its 2045 ridership estimates is based on a nearly 70 percent diversion of riders. This translates to more than three million passengers. This diversion of ridership, if realized, could adversely affect plans already under way for Amtrak and MARC improvements, the scuttling of which would again more noticeably affect the SCMAGLEV project areas outside of the metropolitan cores of Washington, D.C. and Baltimore.

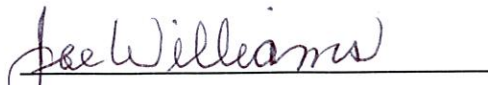
- Potential ridership is particularly important considering the construction cost overruns and the legitimate skepticism from Maryland residents about BWRR's financial claims. U.S. and international experience with high-speed rail, especially maglev-technology-based train systems, must be carefully considered and should weigh heavily in any WQC decision by the MDE.
- Social/environmental justice assessments are not comprehensive. Many organizations, including Landover Hills, 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 BWRR WQC.
- 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.

For these reasons and others that are fully detailed in our comments on the DEIS, which are attached, 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,


 Jeffrey Schomisch, Mayor


 Jeannette Ripley, Vice Mayor


 Joe Williams, Councilman


 Mike Walker, Councilman


 Todd Over, Councilman


 Glenda Johnson, Councilwoman


 Kathleen Walker, Councilwoman