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Maryland Department of Planning
301 West Preston Street, Suite 1101
Baltimore, Maryland 21201
Attn: Ms. Myra Barnes, Lead Clearinghouse Coordinator

**RE: Superconducting Magnetic Levitation (SCMAGLEV) Project
Draft Environmental Impact Statement (DEIS), Draft Section 4(f) Evaluation,
and Draft Section 106 Programmatic Agreement
(State Application Identifier - MD20210202-0061) R3: NOT CONSISTENT**

The Departments of Planning and Transportation are in receipt of the Draft Environmental Impact Statement (DEIS), Draft Section 4(f), and Draft Section 106 Programmatic Agreement, as prepared by The Federal Railroad Administration (FRA) and the Maryland Department of Transportation (MDOT), to document the evaluation of the potential beneficial and adverse environmental impacts of the Superconducting Magnetic Levitation (SCMAGLEV) Project.

The project sponsor, Baltimore Washington Rapid Rail, LLC proposes to construct and operate an SCMAGLEV passenger train system between Baltimore, MD and Washington, DC, along the Baltimore Washington Parkway, and has identified and proposed two alternative station locations for the City of Baltimore: an above ground Cherry Hill Station to be located above the Cherry Hill Light Rail Station, and the other being an underground Camden Yards Station in Downtown Baltimore.

The City of Baltimore has several concerns with the DEIS related to equity, environmental justice, and community impacts. Additionally, the draft lacks a sufficient level of detail regarding current and future plans for the project which make a comprehensive analysis difficult. The proposed project is also not aligned with significant efforts underway to upgrade existing rail infrastructure in the corridor. These concerns are outlined below in more detail.

Construction Impacts on Communities

It is recognized that there are 13 alternatives that have moved forward in the DEIS, and one is a No-Build alternative. More specifically, there are 6 - J (Baltimore Washington Parkway West) Alignment Options, and 6 - J1 (Baltimore Washington Parkway East) Alignment Options. In either case, the proposed alignment options for J - (East of BW Parkway), and option J1 - (West of BW Parkway), exude concerns about the cumulative impacts and affects of an added passenger train service on the environmental confines within the 30+ mile alignment, to include federal property, and each of the local municipalities between Baltimore and Washington, DC.

More specifically, while numerous local jurisdictions and riders along the corridor would not be served by the SCMAGLEV, they would be subjected to the construction impacts. This consists of guideway structures and posts, tunnels, viaducts, vent shafts, emergency exits, and a Train Maintenance Facility (TMF), combined with the existing infrastructure for the MARC and Amtrak service. The affects upon which, would come at the expense of numerous impacts along the entire segment, to include any future northeast segments, that have not yet been engineered, or fully studied as part of the DEIS. It should also be noted that the proposed station area locations largely support preferred geotechnical alignments to allow for more streamlined guideways to achieve maximum speeds, as opposed to areas that may be the best from a land use perspective.

More specifically, as the DEIS indicates with Section 4.2.9.5 – Mitigation Strategies which include modifications to Annapolis Road and Waterview Avenue streets, and approaches to and from Annapolis Road need to be fully evaluated. Such modifications or mitigation strategies however precede the proposed Westport Development, and are therefore inconclusive.

The Cherry Hill Station is to be an above ground/elevated station, located above the existing Cherry Hill Light Rail Station. This location would be approximately 2.5 miles from downtown Baltimore (Camden Yards). The last mile(s) access to downtown Baltimore would need to be accomplished via auto, shuttle bus or Light Rail service, adding an additional 8-18 minutes in travel time to/from downtown Baltimore.

The Cherry Hill Station option would also need to address the potential impacts to or resulting from the nearby active CSX rail line. This elevated station option would also largely rule out the potential for “Tail Tracks”, and other support facilities identified in the DEIS. Tail tracks have been shown as being located in the Westport Community along the southern edge where there is now a newly planned waterfront residential community. The size and scale of a station at this location also raises concerns about what could be perceived as a similar passenger rail operation that exists at the West Baltimore MARC Station. The amount of traffic (both vehicular and pedestrian), parking demands, shuttle operations etc., during peak hours will likely be an issue for this location due to it having even less, or limited access. Passenger boarding counts at West Baltimore MARC, as of 2018, indicates a level of 700 per day. It is estimated that a total of 2,636 pedestrians would be loaded onto the Cherry Hill Station area sidewalk during the AM peak hour.

This station also requires the construction of a portal at the Annapolis Road and Patapsco Avenue Arena - Flea Market site. that would extend above and across I-295 to connect to an elevated station above the Cherry Hill Light Rail station. This location also raises concern due to its proximity to the proposed BWI Marshall Airport Station and the minimal travel distance between the two stations for high speed rail. More importantly, justification for this station seems to be largely based on cost versus ridership, as it would cost an estimated \$1.4 Billion less than what it would cost to build a below ground station at Camden Yards.

Camden Yards Station

The proposed Camden Yards Station was viewed as more of a regional destination for commuters with better access to a highway system, with ample parking and more convenient intermodal connections. It would also be more pedestrian-oriented and provide a direct link to the Convention Center, much like the proposed SCMAGLEV Washington DC Station. From a cost perspective, constructing a downtown station would incur the added cost of using a cut and cover technique, or a top-down construction method which would likely require that several buildings, over the span of approximately three miles to be demolished. A top-down method of construction at this location would also impact a number of surrounding buildings, roadways and destinations including: Oriole Park at Camden Yards, M&T Bank Stadium, the MLK Boulevard viaduct, the Federal Reserve Bank, the Baltimore Convention Center, the historic Otterbein Church and Otterbein Historic District, likely the Sharp-Leadenhall Historic District, and the Inner Harbor.

The Camden Yards Station is also more challenging as the orientation and alignment does not match the existing Baltimore Street grid. To access the station area, the DEIS indicates that all buildings above the proposed station for a distance of 1,970 linear feet will have to be demolished to create space for a top-down construction. The SCMAGLEV Team reports that it is not feasible to build a station at this location using the tunnel boring method (TBM) because of the width required for a station, the presence of underground utilities and the presence of adjacent building and roadway support structures. The Camden Yards Station also proposed two entrances, one located on Conway Street and one located along sharp Street just south of Pratt Street. Passengers during the AM peak at Pratt Street east of Sharp Street are projected at an estimated loading of an additional 599 pedestrians, with an additional 523 pedestrians at the

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