

Government of the District of Columbia

Department of Transportation



May 24, 2021

Ms. Lauren Molesworth
Environmental Planning Manager
SCMAGLEV Project
Maryland Transit Administration
6 Saint Paul St, Baltimore, MD 21202

Comments emailed to info@bwmaglev.info

Re: Comments on the Draft Environmental Impact Statement for the Baltimore-Washington
SCMAGLEV Project.

Dear Ms. Molesworth,

The District Department of Transportation (DDOT) appreciates the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS), which the Federal Railroad Administration (FRA) and the Maryland Department of Transportation (MDOT) released on January 15, 2021 for the proposed Baltimore-Washington Superconducting Maglev (SCMAGLEV) Project, in accordance with requirements of the National Environmental Policy Act of 1969 (NEPA), as amended, and other applicable regulations and procedures. DDOT is pleased to provide these comments, which are attached (see Attachment 1), by the May 24, 2021 submission deadline requested by FRA and MDOT. DDOT furnishes these comments with the intent of improving the assessment of environmental impacts to the District and its resources. Please note that these are DDOT specific comments and we understand other District agencies will be providing separate comments.

DDOT has been an active participant in the NEPA process for this project since 2016, when we asked to be a Participating Agency and has shared our concerns with FRA and MDOT during various coordination meetings and via comment letters, as follows: June 2017 comments on the Purpose and Need and the project Scoping phase; September 2018 Nonconcurrency Letter on the SCMAGLEV Draft Alternatives Report; and November 2020 comments on the Administrative Review DEIS (see Attachment 2). Over the course of the NEPA process, DDOT has shared the following concerns:

- FRA and MDOT must consult with DDOT when identifying the specific study area boundaries for individual resources and incorporate District-specific requirements into the impact analyses.
- Assumptions and inputs must be carefully considered to take into account other proposed projects within the project area when developing the alternatives and assessing the impacts.
- Impacts and benefits to the District versus those to the region, specifically, impacts of terminal facilities, impacts to surrounding multi-modal transportation network, and impacts to any right-of way needed within the District must be carefully analyzed.
- FRA and MDOT must conduct extensive public outreach in the potentially affected areas of the District, including locations, language, and in format accessible to District residents.
- Because the station location and station entrance at Mt. Vernon Square presents substantial planning, design and operational challenges for auto traffic, transit, bicycle, and pedestrian circulation, FRA and MDOT must prepare thorough analyses to ensure that District's future plans for multi-modal network operations along this corridor are not compromised.
- The addition of 1,000-parking space garage is not in line with the District long-range transportation plan, moveDC as it will attract more traffic into an already congested downtown and discourage the use of adjacent transit opportunities. The project should evaluate availability capacity at existing garages downtown and at satellite locations in Maryland and Virginia and provide a plan to direct passengers who arrive by personal vehicle to those locations.
- DDOT strongly discourages any additional pick-up and drop-off activity (outside of the established taxi stand near the convention center) that will result in degradation of Levels of Service at intersections and along nearby streets.
- Intermodal connections, especially to existing facilities such as nearby WMATA station must be assessed in terms of time, access, ease of connection, and possible impacts, so as to minimize the impact to the mobility of our residents, workers and visitors to the District.
- The New York Avenue right-of-way is owned by DDOT and is part of the National Highway System. Any disposition of the ROW will require Federal Highway Administration approval and concurrence, which must be done as part of the NEPA process.
- Incorporate into the analysis, the goals and recommendations outlined in the District's Mount Vernon Square District Design Project (<https://planning.dc.gov/page/mount-vernon-square-district-project>). The effort synthesizes several planning, public realm design, transportation, and economic development initiatives within, and in the vicinity of, Mount Vernon Square District, which are valuable to planning the SCMAGLEV project.

- DDOT requires a Comprehensive Transportation Review (CTR) be conducted for any large-scale transportation project in the District with potential impacts to the transportation network, such as the location of the SCMAGLEV station and any other type of ancillary facilities.
- DDOT is concerned with the anticipated lengthy construction period as well as the construction method that will be used for this project. Details of the impacts and planned mitigation must be carefully planned, designed, and implemented.

Upon careful review of the DEIS, DDOT believes that these concerns have not been adequately addressed. Because of the lack of detailed analyses in the DEIS, we do not have the information necessary to fully understand the impacts of the SCMAGLEV Project to the District, its residents and visitors, and its resources. Overall, DDOT requests that FRA and MDOT include additional analyses and other detail necessary to address our above concerns and comments, as outlined in Attachment 1.

We look forward to formal response to our comments and integration of our requests into the development of the Final EIS. Please contact my staff, Austina Casey (austina.casey@dc.gov) or Aaron Zimmerman (aaron.zimmerman@dc.gov), if you have any questions.

Sincerely,

Ellen Jones

Ellen Jones
Chief Project Delivery Officer

ATTACHMENTS:

Attachment 1: DDOT Comments on the Baltimore-Washington SCMAGLEV Project DEIS

Attachment 2: Past DDOT Comments on the Baltimore-Washington SCMAGLEV Project