



TRANSMITTAL

To: Lauren Molesworth
Environmental Planning Manager
Maryland Transit Administration

From: Andrew Trueblood
Director

Date: May 24, 2021

Subject: Comments on the Baltimore-Washington SCMAGLEV Project DEIS from the
Office of Planning

The District of Columbia Office of Planning (OP) is pleased to provide comments on the Draft Environmental Impact Statement (DEIS) released by the Federal Railroad Administration (FRA) on January 15, 2021 for the proposed Baltimore-Washington Superconducting Maglev (SCMAGLEV) Project, in accordance with requirements of the National Environmental Policy Act (NEPA). These comments are furnished by the DEIS comment deadline of May 24, 2021 and are attached (Attachment 1).

OP has been an active participant in the NEPA process and is supportive of transportation infrastructure projects that enhance regional mobility, move people equitably and efficiently, and have the potential to significantly reduce vehicle miles traveled and greenhouse gas emissions. Based on these goals and to help ensure a project of this nature and magnitude is designed and analyzed in manner responsive to local needs and context, OP developed three overarching principles:

1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by the SCMAGLEV Project.
2. Ensure effective integration of the SCMAGLEV Project—including station areas, ancillary facilities, and above-ground guideways—with immediate sites, adjacent neighborhoods, and citywide context.
3. Prioritize intermodal systems effectiveness and efficiency.

OP shared the above principles with FRA in October 2018 via a Nonconcurrency Letter on the SCMAGLEV Draft Alternatives Report (Attachment 2) and again in January 2021 via a Director's Statement (Attachment 3).

OP's detailed comments on the DEIS (Attachment 1) were developed using these principles as a guiding framework. Overall, OP finds that the DEIS should include additional analysis and other

information necessary for OP and other stakeholders to understand the project properly, and to make informed comments on project impacts at both local and regional scales.

As you will see from our detailed comments (Attachment 1), the DEIS should provide more information for the Mount Vernon Station and its entrances, the station's relationship to the surrounding neighborhood, and its impact on the District's transportation network. Furthermore, the DEIS does not fully identify and address land use, transportation, social, and economic impacts of the project. The DEIS should provide more information on project impacts on the New York Avenue Corridor, especially during construction. New York Avenue is a vital goods corridor for the District and must have continuity of operation during construction. The Maglev project should use best efforts to ensure construction methods that allow for continuous, uninterrupted operation of the corridor.

We would also like to highlight the importance of including direct underground connections between the Mount Vernon Maglev Station and Metrorail Stations at Gallery Place-Chinatown and Mount Vernon Square. These connections facilitate sustainable, multimodal access to the proposed project. The DEIS lacks information necessary to determine whether these connections are currently contemplated, and we therefore urge FRA to address these connections and provide related analysis in the FEIS.

We encourage a significant reduction in the size of the proposed 1,000-space parking garage proposed for the Mount Vernon Square Maglev Station. There is little detail in the DEIS on the justification for the garage's size or how it would be accessed. Mount Vernon Square is a highly transit accessible area of the District and a garage of this size is incompatible with the needs of the neighborhood and inconsistent with District transportation and climate change mitigation goals that include reducing single occupancy vehicle trips, encouraging transit use, and providing complete streets that serve multiple modes.


Construction of any underground facilities for the Mount Vernon Square Maglev Station should not diminish the ability to reach full residential and/or commercial potential at the site, as shown in the District's Future Land Use Map. OP has shared similar concerns in relation to the parking garage proposed in the Washington Union Station Expansion Project DEIS, referenced in the Maglev DEIS as a planned project.

While the above highlights OP's overall concerns for the DEIS, the comments we submit as Attachment 1 provide OP's detailed requests for modifications to the Preferred Alternative and additional DEIS analyses that should be conducted and incorporated into the FEIS.

We look forward to formal response to our comments and integration of our requests into the DEIS and FEIS processes. In the meantime, please reach out to Rogelio Flores

(rogelio.flores@dc.gov) or Kristin Calkins (kristin.calkins@dc.gov) of my staff should you have any questions.

Sincerely,



Andrew Trueblood

cc: John Falcicchio, Deputy Mayor for Planning and Economic Development
Everett Lott, Acting Director, District of Columbia Department of Transportation
Tommy Wells, Director, District of Columbia Department of Energy and Environment
Chairman Phil Mendelson, Council of the District of Columbia
Councilmember Mary Cheh, Chair, Committee on Transportation and the Environment
Councilmember Brooke Pinto, Ward 2
Councilmember Kenyan McDuffie, Ward 5
Councilmember Charles Allen, Ward 6
Advisory Neighborhood Commissioner Michael Shankle, Chair, ANC 2C
Advisory Neighborhood Commissioner John Fanning, Chair, ANC 2F
Advisory Neighborhood Commissioner Jacqueline Manning, Chair, ANC 5C
Advisory Neighborhood Commissioner Sydelle Moore, Chair, ANC 5D
Advisory Neighborhood Commissioner Bradley Ashton Thomas, Chair, ANC 5E
Advisory Neighborhood Commissioner Rachelle Nigro, Chair, ANC 6E
Advisory Neighborhood Commissioner Karen Wirt, Chair, ANC 6C
Vivian Guerra, Chief of Staff, Office of Planning
Sakina Khan, Deputy Director Citywide Strategy and Analysis, Office of Planning
Rogelio Flores, Associate Director, Citywide Planning, Office of Planning
Kristin Calkins, Senior Transportation Planner, Office of Planning

Attachments

Attachment 1: District of Columbia Office of Planning Comments on the Baltimore-Washington SCMAGLEV Project DEIS (May 24, 2021)

Attachment 2: Non-Concurrence with the Baltimore-Washington Superconducting Magnetic Levitation Train System Project Draft Alternatives Report dated August 31, 2018 (October 1, 2018)

Attachment 3: Statement from Director Andrew Trueblood on the Baltimore-Washington Super Conducting Maglev Project DEIS (January 25, 2021)

Index	DEIS Chapter	DEIS Section	Page #	DEIS Text	OP's Guiding Principle for the Maglev Project (from October 1, 2018 Letter to FRA)	Comment
1	Alternatives Considered	3.3.2.4 Stations	3-26	Table 3.4-4: Summary of Station Locations and Features Mount Vernon Square East (Washington, D.C.): 5-level, 1,000 space underground facility	3. Prioritize intermodal systems effectiveness and efficiency	<p>The District is strongly opposed to the inclusion of a 1,000 space parking garage in this project. A parking structure of this size does not make sense for a DC to Baltimore connection. There needs to be a much more robust analysis of the assumptions used to generate the demand for over 3,000 parking spaces per day in the District, which is the justification for the 1,000 space parking garage.</p> <p>A parking garage of this size is in direct conflict with District Policies to reduce single-occupancy vehicle trips. A 5-level underground parking garage would create considerable disruption during construction and contribute to roadway congestion in the surrounding area.</p> <p>The Comprehensive Plan Transportation Element has a policy that speaks directly to this goal; Policy T-1.1.8: Minimize Off-Street Parking An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged.</p>
2	Alternatives Considered	3.3.2.4 Stations	3-28	Figure 3.4-8: Concept Plans for Mount Vernon Square East Station and BWI Marshall Airport Station	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	There should be separate figures for BWI and Mount Vernon Square, the current diagrams are difficult to understand as illustrated.
3	Alternatives Considered	Section: 3.3.2.6	3-34	At this time, the Project Sponsor has identified there would be two substations required at the TMF and five required for the mainline alignments, Build Alternatives J and J1...Build Alternatives J and J1 power substation locations.... New York Avenue NW at Adams Place NE, Washington, D.C.: 14 acres.	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	<p>The Adams Place, NE site (2100 Adams Place, NE and 2200 Adams Place, NE) is identified as a location of a permanent substation for the project. These parcels are owned by the District of Columbia, representing approximately six acres of the Adams Place, NE site, and have approximately 12 structures that are home to mission critical uses for multiple District agencies, including the Office of the State Superintendent of Education, the Department of General Services, the Department of Public Works, the Office of Contracting and Procurement, and the District of Columbia Public Schools. For example, the Office of the State Superintendent of Education uses this facility to store school buses and the Department of Public Works has a fueling station on the site. These are only two of the many ways the District uses these sites. Additionally, a private facility abutting the subject site is leased by the District to store Fire and Emergency Medical vehicles. The DEIS does not identify impacts to these facilities and uses, and makes no mention or discussion of them.</p> <p>The FEIS must identify all public facilities, uses, and functions on this site and adjacent sites. The DEIS must identify the temporary and permanent impacts of the proposed project to these facilities, uses and functions; work with the appropriate District agencies and property owners to develop mitigations; and detail mitigations that address any negative impacts to these agencies and their operations in the FEIS. If the project is anticipated to displace any facility, use and/or function at Adams Place, NE, the FEIS shall ensure appropriate mitigations are included, including the identification and procurement of alternative locations for these uses, and reconstruction of replacement facilities at sponsor expense, prior to project work at the subject site.</p>
4	Transportation	4.2.2.2 Methodology	4.2-3	For this analysis, FRA considered a one-mile radius around the physical footprint of each passenger station.	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	A map of the study area surrounding the station should be included in an updated document. Without seeing a study area map, the area of assessed impact is difficult to understand. The study area of impacts around the station does not adequately reflect the area of impact for the stations. A larger footprint should be considered to include major intersections that would be just outside the one mile buffer.
5	Transportation	4.2.6.6 Impacts	4.2-16	The data in the table shows that there will be increased demand on bus and rail routes serving the three SCMAGLEV Project stations, especially in Baltimore and Washington, D.C. This increased demand may require increased service frequencies on bus and rail, or longer trains on the rail services, serving the SCMAGLEV Project stations (Metrorail in Washington, D.C. and Baltimore Metro and Light Rail in Baltimore).	3. Prioritize intermodal systems effectiveness and efficiency	<p>The project should include direct pedestrian/bike connections in the design of their station to Mount Vernon/Convention Center and Gallery Place Chinatown Metrorail Stations. A connection to Metro Center Station should be considered as part of the project. These connections will allow for convenient connections to the Metrorail system, and mitigate pedestrian impacts at grade.</p> <p>Assessments of the impacts to Metrorail ridership and circulation due to these direct connections are also needed in an updated document.</p>
6	Transportation	4.2.10.3 Future Build Alternatives	4.2-24	The future Build Network consists of the Future No Build network plus the addition of the SCMAGLEV physical improvements and train operations to the network. The Project Sponsor is including an underground parking facility with 1,000 spaces and a drop off/pick-up area, including taxi staging, on the first below-ground floor of the proposed underground garage, between 5th and 6th Streets NW.	3. Prioritize intermodal systems effectiveness and efficiency	<p>Building a new 1,000 space parking garage to serve Maglev passengers who want to drive and park in the core of the nation's capital is contrary to many District policy and objectives, and presents an antiquated and inefficient way of managing transportation demand to the station.</p> <p>OP strongly opposes a garage of this size being included in the project. Mount Vernon Square is the most transit-rich part of the District, provides a very high level of walkability, and is proximate to DC's Downtown Core.</p> <p>Facilitating Maglev riders ability to drive to a proposed Maglev Station in Mt. Vernon Square by providing a new 1000-space parking garage is in direct conflict with District goals for reducing single occupancy vehicle trips and for providing a mix of land uses that support high density and multiple uses in this area, which are in turn strongly supported by rich alternative transportation modes including a wide array of transit options.</p> <p>The 1,000-space parking garage in Mt. Vernon Square conflicts with many Comprehensive Plan Policies, including in the Land Use, Transportation, and Environmental Protection Elements. A few examples are as follows: The Transportation Element has many policies that discourages parking including "Policy T-1.1.8: Minimize Off-Street Parking: An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged". The Environmental Protection Element includes the District's goal of reducing GHG by 50% by 2032, encouraging single occupancy vehicles to drive into the core of downtown to park is counter productive to this goal . Finally, policies contained in other city plans and strategies are also not supportive of a garage, including Climate Ready DC, Sustainable DC, moveDC, OP Climate Change Strategic Plan, Clean Energy DC, and the Region's CLRP Visualize 2045.</p> <p>Clearly, a 1000-space garage counters these goals. Riders should be encouraged to reach the station by sustainable modes of transportation.</p>
7	Transportation	4.2.10.5 Mitigation Strategies	4.2-26	Evaluate the potential for adding roadway capacity in the station area including additional left turn capacity. Focus would be on separating station traffic from general traffic to the greatest degree possible.	3. Prioritize intermodal systems effectiveness and efficiency	The District's public rights-of-way (ROWs) serve multiple modes that include transit, pedestrians, and cyclists. Physical or operational changes to the ROW that prioritize private vehicles are not supported by District policy, including in Comp Plan Citywide Elements and moveDC. The Office of Planning does not support focusing mitigations on facilitating vehicular access to the station. Any modification to ROW operations or physical configuration should prioritize transit, pedestrian and bicycle modes and enhanced connectivity for these.

Index	DEIS Chapter	DEIS Section	Page #	DEIS Text	OP's Guiding Principle for the Maglev Project (from October 1, 2018 Letter to FRA)	Comment
8	Transportation	4.2.14.3 Future Build Alternatives	4.2-33	Table 4.2-8: Proposed Parking Capacity Added at Each Station Area and Daily Excess Demand for Parking Forecasted Daily SCMAGLEV Riders Arriving at Station and Parking: 3,769 or 3,360	3. Prioritize intermodal systems effectiveness and efficiency	<p>A detailed description of the methodology that was used to identify a demand of 3,769 parkers per day at the mount Vernon Square station is needed in the FEIS. 3,769 vehicles driving into downtown DC to park, to take a trip to Baltimore is questionably high. The impact of these vehicles on District roadways will be significant.</p> <p>A robust description about the assumptions of what riders will be driving to the station to park, and the background factors, is necessary. Our sister agency the DC Department of Transportation is providing comments in parallel with OP.</p> <p>1,000 spaces suggests a demand level that greatly exceeds a Maglev train ride from DC to Baltimore. If there are other assumptions and factors driving the demand for parking they should be addressed in the updated document.</p>
9	Transportation	4.2.15.4 Impacts	4.2-35	The heaviest estimated AM peak hour loadings onto the Station area sidewalk network from the SCMAGLEV Project station would be on the north leg of the 7th Street/New York Avenue intersection, with an additional 1,710 pedestrians loaded onto this sidewalk network link beyond future No Build volumes in the AM peak hour.	3. Prioritize intermodal systems effectiveness and efficiency	<p>The project should include a more detailed pedestrian circulation analysis of the impact of these additional 1,710 pedestrians. The final document should include what necessary mitigations and accommodations will be needed to meeting this increased demand including, but not limited to expanded sidewalks, enhanced pedestrian crossings, and increase pedestrian crossing time at intersections.</p> <p>These recommendations should protect pedestrians from vehicular conflicts and work towards the District's Vision Zero goal of zero traffic fatalities.</p>
10	Transportation	4.2.15.4 Impacts	4.2-35	Pedestrian network upgrades in the immediate station area of the Washington, D.C. Station would be constrained due the dense urban nature of the station area and therefore some sidewalk crowding is to be anticipated during the AM peak hour.	3. Prioritize intermodal systems effectiveness and efficiency	<p>The project should include direct pedestrian/bike connections in the design of their station to Mount Vernon/Convention Center and Gallery Place Chinatown Metrorail Stations. A connection to Metro Center Station should be considered as part of the project. These connections will allow for convenient connections to the Metrorail system, and mitigate pedestrian impacts at grade.</p> <p>Impacts to Metrorail ridership and circulation due to these direct connections need to be analyzed.</p>
11	Transportation	4.2.16.4 Impacts	4.2-37	Mount Vernon East Station – Impacts by each designated pick-up drop off area include.	3. Prioritize intermodal systems effectiveness and efficiency	<p>Volumes associated with pick-up-drop-off must be included in this section. Without understanding mode split the impacts and mitigations cannot be properly assessed or understood. The narrative should be updated to provide a clear and robust understanding on how ride-hailing/ pick-up-drop-off will be accommodated at the station entrances.</p> <p>There should also be detailed diagrams included in this section showing the location of these PUDO zones, and their relationship to the surrounding area.</p>
12	Transportation	4.2.16.6 Construction Period Impacts	4.2-38	<p>The SCMAGLEV Project Affected Environment transportation network will be temporarily impacted during SCMAGLEV construction in three predominant areas. These are:</p> <ul style="list-style-type: none">-I impacts related to truck and auto arrivals and departures at work sites along the SCMAGLEV Project alignment.- Impacts to traffic operations due to closed or modified intersections during construction.- Impacts to transit services operating in areas of construction activity. <p>Current conditions, impact assessment and mitigation strategies related to each of these impact areas are outlined below.</p>	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	NY Avenue must remain operational during the entire period of construction, as it is one of the most vital corridors in the District, serving goods movement, private vehicle commuters, emergency vehicles, and other modes. The project proposal - including construction technology and operations - must be modified to reflect this reality.
13	Land Use and Zoning	4.3.1 Introduction	4.3-1	A list of the comprehensive planning documents that guide development within the SCMAGLEV Project Affected Environment is located in Appendix D.3 Table D.3-1	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	The referenced table does not seem to exist. Include the table so that the public, elected officials and staff can understand which planning documents were used to prepare the DEIS. The Comprehensive Plan is important, but not the only document with relevance to the Mount Vernon Area. Other plans should at least include Ward 5 Works Plan, the NoMa Plan, and any applicable plan covering the Mt. Vernon Triangle area.
14	Land Use and Zoning	4.3 Land Use	4.3-4-5	Tables 4.3-1, 4.3-2, 4.3-3	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	Segment the referenced tables by jurisdiction to allow for the public, elected officials and staff to understand the effect on the District.
15	Land Use and Zoning	4.3.3.2 Zoning	4.3-7	Zoning designations present within the SCMAGLEV Project Affected Environment are summarized below and identified on mapping in Appendix D.3 Figure D.3-6.	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	The referenced zoning maps and figure do not seem to exist in Appendix D.3. Include these sources in the DEIS as it is necessary to know which zoning districts are impacted.
16	Land Use and Zoning	4.3.4.2 - Build Alternatives	4.3-9	The construction of some SCMAGLEV Project features would be in contrast to current and surrounding land uses....SCMAGLEV Project facilities would be located in proximity to residential and commercial uses and forested areas.	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	DEIS proposes substation on the site of a recently opened public park, Alethia Tanner Park, at Harry Thomas Way and Q Streets, NE. The park must be identified on the map of recreation facilities on p. 17 of Appendix D-3. The District would not support this location for a substation. The DEIS must also state what the scope and scale of the substations would be. That information will be necessary to evaluate the impacts of the substation in the newly chosen location.
17	Land Use and Zoning	4.3.4.2 - Build Alternatives	4.3-9	The construction of some SCMAGLEV Project features would be in contrast to current and surrounding land uses....SCMAGLEV Project facilities would be located in proximity to residential and commercial uses and forested areas.	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	The DEIS proposes a substation and other facilities in a triangle formed by New York Avenue, NE, Queen's Chapel Road, and the "Camden Line" railroad tracks. This is currently the site of industrial uses and a housing shelter, among other uses. The proposed use change must be analyzed against the Ward 5 Works Plan, which generally calls for the preservation of industrial lands in the area. This area may also be the subject of a broader New York Avenue planning initiative in the near future, which is looking at increased density along the corridor. It is possible that that effort would not result in support for inactive uses along New York Avenue in that area.

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18	Land Use and Zoning	4.3.4.2 - Build Alternatives	4.3-10	Table 4.3-4	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	The referenced table must include land use and / or parcel impacts in the District.
19	Land Use and Zoning	4.3.4.2 - Build Alternatives	4.3-13	Mount Vernon Square East Station access points would be southeast of the 6th Street NW and New York Avenue NW intersection, northeast of the 4th Street NW and New York Avenue NW intersection, and northwest of the 1st Street NW and New York Avenue NW intersection within the New York Avenue Playground and Park	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	There is not adequate detail provided as to the size or design of station entrances, or their precise locations and orientations. For example, the proposed entrance at New York Avenue and 1st Street, NW is on the site of an active public park. Provide more information to evaluate the potential impacts on the park.
20	Land Use and Zoning	4.3.4.2 - Build Alternatives	4.3-13	Mount Vernon Square East Station access points would be southeast of the 6th Street NW and New York Avenue NW intersection, northeast of the 4th Street NW and New York Avenue NW intersection, and northwest of the 1st Street NW and New York Avenue NW intersection within the New York Avenue Playground and Park	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	The most logical location for a surface pedestrian entrance would be near Mount Vernon Square. The DEIS should study entrance locations near the Square, and as part of that process incorporate historic preservation concerns, including the historic library. The station design should also include underground connections to the Convention Center, Mount Vernon Square Metrorail Station and Galley Place-Chinatown Metrorail Station.
21	Land Use and Zoning	4.3.5	4.3-15	"The Washington, D.C. Station and the Camden Yards Station in Baltimore City are underground to avoid significant permanent land use changes in urban, highly developed areas"	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	An analysis of impacts on land use during the construction of the station along New York Avenue is needed.
22	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-5	Table 4.4-1: Permanent and Temporary Impacts to Neighborhoods and Community Facilities by Build Alternatives	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	Do not use "Cluster" number for this table; It is more appropriate to use neighborhood names or exact locations. This would help District officials, staff and residents understand impacts. The table must also be divided by jurisdiction for ease of analysis.
23	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-7	An overview of other SCMAGLEV Project impacts to neighborhoods and community facilities is provided below:	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	An analysis of potential adverse impacts on community cohesion in Washington, DC neighborhoods, especially as a result of the construction impacts along New York Avenue, is needed.
24	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-7	The Build Alternatives could have an adverse impact on community cohesion by displacing residents, businesses, and community facilities; introducing large transportation structures into residential and forested areas; changing residents' ability to navigate around their community; and disrupting interaction between people and groups within a community.	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	Identification and mitigation of the impacts on community cohesion by displacing residents, businesses, and community facilities; introducing large transportation structures into residential and forested areas; changing residents' ability to navigate around their community; and disrupting interaction between people and groups within a community is needed.
25	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-8	Impacts related to noise, vibration, and visual quality are prevalent throughout the corridor and would occur in neighborhoods and at community facilities within close proximity to the Build Alternatives	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	Identification and mitigation of adverse impacts related to noise, vibration and visual quality is needed for neighborhoods and community facilities withing proximity to the proposed project and associated facilities.
26	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-8-9	The SCMAGLEV Project has incorporated safety in the planning and design, core systems, facilities, and maintenance practices, including a systemwide state-of-the-art signaling system to avoid collisions, multiple FA/EE facilities, emergency signage and lighting, and security fencing.	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	A discussion of the appearance of these facilities and features is needed, specifically an analysis of how they will integrate into the surrounding area and any potential mitigations.
27	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-10	All Build Alternatives would result in the following impact....	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	The list of impacts in the District is incomplete. The DEIS proposes substations and other facilities in NoMa and on industrial land near New York Avenue. Those impacts must be noted for the District, as they are for substations in Prince George's County.
28	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-16	Mount Vernon Square East Station access points would be southwest and northeast of the 6th Street NW and New York Avenue NW intersection...	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	The northeast corner of the New York Avenue and 6th Street houses an MPD facility. MPD must be consulted, and any impacts to the historic building, a contributing structure to the Mt. Vernon Square Historic District, must be addressed.
29	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-16	Mount Vernon Square East Station access points would be southwest and northeast of the 6th Street NW and New York Avenue NW intersection, northeast of the 4th Street NW and New York Avenue NW intersection, and northwest of the 1st Street NW and New York Avenue NW intersection within the New York Avenue Playground and Park.	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	The intersection of 4th Street and New York Avenue is currently not pedestrian friendly, as this is the end of the center-leg freeway. The DEIS must describe what pedestrian improvements are being proposed to improve this location and if more pedestrian friendly locations were studied.
30	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-16	Mount Vernon Square East Station access points would be southwest and northeast of the 6th Street NW and New York Avenue NW intersection, northeast of the 4th Street NW and New York Avenue NW intersection, and northwest of the 1st Street NW and New York Avenue NW intersection within the New York Avenue Playground and Park.	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	The DEIS must address how the northwest corner of New York Avenue and 1st Street selected for an entrance, and if consideration was given to the southwest corner of the same intersection, and other locations.

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31	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-16	A portion of the park (0.16 acres) that borders New York Avenue would be acquired. The entrance would be located in an area of lawn and trees adjacent to the south side of the outfield of a baseball diamond. The Kennedy Recreation Center, approximately 2,200 feet northwest at 6th and O Streets NW, offers similar space of lawn and trees adjacent to a baseball diamond and other ballfields/courts.	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	Removal of community park space is not mitigated by the presence of similar space nearby, as this does not take into account amount of usage. As users shift to another location, capacity at the second location could be strained. The DEIS must include more analysis of the usage rate of the park, who uses it, where they live, and whether typical users have any mobility limitations. If this location for an entrance is still preferred, the DEIS must identify new, replacement park space options in the immediate vicinity, rather than an existing park almost half a mile away.
32	Neighborhoods and Community Facilities	4.4.4.2 Build Alternatives	4.4-16	The Mount Vernon Square East Station would result in property acquisition of two public parking lots located between 6th and 5th Streets NW and west of 6th Street. These parking lots offer public parking and would be replaced by the Mount Vernon Square East Station Headhouse and Parking Garage.	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	<p>The DEIS must explain whether the existing parking is required for any adjacent or nearby use. The DEIS must also address how the two lots acquired for the below ground parking garage would be used. A discussion of the at grade land use is needed.</p> <p>While the District strongly opposes the inclusion of a below grade parking garage of this size as part of this project, the entrances to the parking garage need to be identified to allow for an understanding of their impact on the surrounding area. There is not detailed information about these entrance locations, which is needed to understand circulation and pedestrian comfort.</p>
33	Neighborhoods and Community Facilities	4.4.4.3 Short-term Construction Effects	4.4-18	Entire section.	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	More explanation is needed regarding the construction logistics for the full extent of the Mount Vernon Square East Station. Clarity is needed on the potential for cut and cover construction along the length of New York Avenue between Mt. Vernon Square and North Capitol Street. Construction disruptions to this stretch of New York Avenue would create significant adverse impacts to traffic flows, community cohesion, and a number of other impacts.
34	Neighborhoods and Community Facilities	4.4.5 Mitigation Strategies	4.4-20	As part of the design process, the Project Sponsor will continue to coordinate with local governments and residents regarding the location, positioning, and exterior design of Build Alternatives including the stations, selected TMF site, and ancillary facilities like the fresh air and emergency egress facilities and substations.	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	While final details may be worked out in the future, more information must be provided to understand the scale of the proposed changes and the impact they will have on the community and environment. Without this information their impact cannot appropriately be assessed. For example, information is needed on how large the pedestrian entrances will be, where the vehicular entrances will be located, impacts of vehicular queuing, and the size, noise and light impacts of substations, among others.
35	Neighborhoods and Community Facilities	4.4.5 Mitigation Strategies	4.4-20	"...the Project Sponsor will be responsible for compensating property owners impacted by property acquisitions. It is anticipated that at least one residential displacement would occur under all the Build Alternatives. The Washington, DC and Baltimore, MD areas single family (detached, attached and condo) housing markets are robust; the historical performance of the housing market suggests that the mix of new and existing homes on the market would allow homeowners to find a replacement dwelling in the same MSA. Additionally, the overall rental vacancy rate, which includes single-family homes and apartments, in Washington, D.C. and Baltimore City were 7.5 percent and 13.5 percent respectively. Therefore, relocation housing should be available within the SCMAGLEV Project area."	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	More detailed analysis of the housing options available to potentially displaced District residents are needed. The narrative appears to be overly optimistic of housing availability and affordability in the District. In October 2020, the median home price in DC was \$675,000 and the median price for a single family home crossed the \$1 million threshold.
36	Affected Environment, Environmental Consequences and Mitigation	4.5.4.2 Build Alternatives	4.5-10	The Adams Place would be displaced by each of the Build Alternatives. The Adam's Place Emergency Shelter is operated by the Catholic Charities and is a men's emergency shelter. The next closest men's shelter is the New York Avenue Shelter located approximately a mile away.	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	The impacts and potential mitigations for the displacement of the Adams Place Emergency shelter in the DEIS are inadequate. Adam's Place is one of three low-barrier, year round emergency men's daytime and 24-hour hypothermia shelters in the District and provides critical homeless services. The FEIS should quantify the shelter's capacity, and average and peak usage and mitigate both the locational impacts of decreased services in Northeast DC and the increased load on the remaining men's shelters with a special focus on the remaining 24-hour hypothermia shelters.
37	Cultural Resources	4.8.2.1 Regulatory Context	NA	NA	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	The DC Historical Landmark and Historic District Protection Act need to be included in this section. This law establishes the DC Historic Preservation Review Board which will review building permits for the project.
38	Cultural Resources	4.8.2.1 Regulatory Context	4.8-8	Temporary or Permanent Impacts	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	This section acknowledges that impacts (or effects for Section 106 purposes) can be temporary or permanent but when considering the project's anticipated seven-year construction duration, the effects on historic properties could last for multiple years. For example, traffic, noise, vibration and other effects from "cut and cover" construction along New York Avenue could occur for a very long time. While this may technically qualify as "temporary," such effects would nevertheless be very significant and would warrant appropriate avoidance and minimization measures.
39	Cultural Resources	4.8.4.2 Build Alternatives	4.8-23	Table 4.8-5 Potential Impacts to Above-ground Resources		Central Public Library (Carnegie Library): Direct effects on this important historic landmark building and its setting should be completely avoided but the table identifies potential for effects on the "character-defining architectural features" of the library. This suggests that effects could be direct in addition to indirect. On a related note, Table 3.4-4 states that access to the station could be provided "via Carnegie Library building." We continue to recommend that all construction directly affecting the library and the square be eliminated from further consideration. Other DIES illustrations suggest that nothing will be constructed directly within Mt. Vernon Square but a potential underground connection to the Convention Center may be proposed. Please confirm that no direct effects to the Carnegie Library are anticipated and elaborate on the potential for indirect effects within Mt. Vernon Square.
40	Aesthetics, Visual Quality, and Light Emissions	4.9.4.2 Build Alternatives	4.9-7-13	NA	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	Include descriptions for Washington, DC Under the "Alignments Heading, there are a series of alignment descriptions for each county and city. (e.g., "Build Alternatives J and J1 alignments in Baltimore County and Baltimore City"). There currently are not, and as such the District is unable to comment on this section.
41	Aesthetics, Visual Quality, and Light Emissions	4.9.4.2 Build Alternatives	4.9-23	Table 4.9-3: Detailed Summary of Visually Sensitive Resources Impacted by Build Alternatives	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	Include Washington, DC in CAA #1 & #2 as the are missing from the table.

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42	Aesthetics, Visual Quality, and Light Emissions	4.9.4.4 Mitigation Strategies	4.9-29	<p>2. Design Criteria: Incorporate design criteria for viaduct, station, TMF, and support facility elements that can adapt to local context and surroundings. During final design, BWRR would implement the following, to the extent feasible:</p> <ul style="list-style-type: none">- Integrate hardscape and landscape elements into the station, TMF, and operational/support facility streetscapes along with street trees and vegetation where possible to soften and screen the appearance of proposed contributing elements.- Design SCMAGLEV Project stations and associated structures such as passenger support facilities, head houses, elevator sha/escalator shafts and other supporting access and pedestrian facilities to be attractive architectural elements or features that add visual interest to the streetscapes near them.-Design SCMAGLEV Project station parking structures and adjacent departure/arrival/taxi stand/kiss-and-ride areas to integrate visually into Washington, D.C., Baltimore City, and BWI Marshall Airport.	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	<p>The Mitigation Strategies related to Design Criteria are inadequate. "Integrate hardscape and landscape elements... along with street trees and vegetation where possible to soften and screen..." is vague and open for interpretation. Design strategies should address specific mitigation strategies at three distinct scales: 1) architectural/landscape quality of the facility elements themselves (building performance, sustainability, aesthetic quality, integration into existing streetscape); 2) impacts on immediate sites (historic preservation, compatible design, resilience, and infrastructure loading/logistics; and 3)impacts on adjacent neighborhoods (same issues as "immediate sites", but broader effects on real estate markets, demographics, and disparate impacts on underserved neighborhoods).</p> <p>"Design... parking structures... to integrate visually..." is inadequate. Parking structures proposed within the urban context of Washington, DC must be integrated in multiple ways - not just visually. Access to parking should have minimal impact on pedestrian experience and movement patterns; potential back-up/overflow queuing should have minimal impact on surrounding neighborhoods; potential above-grade parking is highly discouraged, and should have no impact on the quality, continuity and vibrancy of ground-floor activity and uses.</p>
43	Aesthetics, Visual Quality, and Light Emissions	4.9.4.4 Mitigation Strategies	4.9-30	<p>5. Apply Minimum Lighting Standards</p> <ul style="list-style-type: none">- Limit artificial outdoor lighting to safety and security requirements and designed using Illuminating Engineering Society's design guidelines and in compliance with approved fixtures.- Lighting should provide minimum impact to the surrounding environment by utilizing downcast, cut-off type fixtures that are shielded and direct the light only towards objects requiring illumination.- Install lights at the lowest allowable height and cast low-angle illumination while minimizing incidental light spill onto adjacent properties, open spaces, or backscatter into the nighttime sky.- Utilize the lowest allowable wattage for all lighted areas and minimize the amount of nighttime lights needed to light an area as much as possible.- Light fixtures will have non-glare finishes that will not cause reflective daytime glare.- Design all lighting to optimize energy efficiency, safety and security, and to be aesthetically pleasing.- All lighting proposed within specified distances of BWI Marshall Airport and Tipton Airport would be designed to comply with FAA Notice of Proposed Construction or Alteration (FAA-7460) and Runway Protection Zone requirements. Lighting will also need to meet MAA and airport lighting standards so that there would be no negative impacts to airport safety.	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	Include descriptions of coordination with DDOT lighting standards and NCPC's Monumental Core Lighting Standards.
44	Appendix D2: Transportation	D.2A.4.3.2 Mount Vernon Station Area Metrorail Service	A.5-17	The first proximate station, Mount Vernon Square on the Green Line, is one block north of the proposed Mount Vernon East SCMAGLEV Station. Gallery Place, on the Green and Red Lines, is approximately four blocks south of the proposed station along 7th Street. Red Line service runs every 4-8 minutes in the peak period and 12 minutes in the off-peak. Green Line service runs every 8 minutes in the peak period and 12 minutes in the off-peak. Metrorail lines and stations in the vicinity of the Mount Vernon SCMAGLEV station are shown in Figure D.2-5.	3. Prioritize intermodal systems effectiveness and efficiency	<p>The project should include direct pedestrian/bike connections in the design of their station to Mount Vernon/Convention Center and Gallery Place Chinatown Metrorail Stations. A connection to Metro Center Station should be considered as part of the project. These connections will allow for convenient connections to the Metrorail system, and mitigate pedestrian impacts at grade.</p> <p>Assessments of the impacts to Metrorail ridership and circulation due to these direct connections are also needed in an updated document.</p>
45	Appendix D2: Transportation	D.2A.14.1 Current Conditions	A-51	Table D.2-32: Pick-Up Drop-Off Zone Requirements – Mount Vernon East Station (Year 2045 Ridership Estimates)	3. Prioritize intermodal systems effectiveness and efficiency	A map showing the relationship and approximate curb space needed for each of these pick-up-drop-off zones should be included in the DEIS. DDOT is currently working on multiple bus and bike lane projects in the area, and these zones should be compared against future available curb space. Pick-up-drop-off zones should be compared to the modal priorities identified in DDOT's ongoing update to moveDC. No PUDO zones should be proposed in conflict with a transit or bicycle priority corridor.

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46	Appendix D2: Transportation	D.2A.17 Construction Period Activity - Impacts to Traffic Operations and Parking Due to Construction Activity	A-95	Mount Vernon East Station - Construction of the Mount Vernon Station will run from 7th Street NW to First Street NW. The proposed work will be constructed using top down construction and will take place over five segments, with different stages of work within each segment. The different stages generally involve work on one side of New York Avenue at a time, with the other side of New York Avenue is open for traffic. The MOT plans generally maintain westbound traffic along New York regardless of which side of the roadway is closed, thus requiring the detour of eastbound traffic. Cross Streets to be closed during different stages of the station construction include First Street NW, New Jersey Avenue, 5th Street NW and 6th Street NW. Required detours for all closures or traffic modifications are identified in the Transportation Technical Report. Parking along New York Avenue and streets adjacent to the construction site will be prohibited at different times during the construction period. Specific closures will depend on the location of the work.	3. Prioritize intermodal systems effectiveness and efficiency	NY Avenue must remain operational during the entire period of construction, as it is one of the most vital corridors in the District, serving goods movement, private vehicle commuters, emergency vehicles, and other modes. The project proposal - including construction technology and operations - must be modified to reflect this reality.
47	Appendix D.4: Economics Impact Analysis Technical Report	D4B.2 Methodology	B-4	Agglomeration impacts occur when the concentration of firms and employees facilitates the exchange of ideas and knowledge in the host market, fostering growth and productivity. To the degree that the SCMAGLEV reduces the effective distance between knowledge industries, the potential for agglomeration economies rises. The economic connections between Washington, D.C. and Baltimore would intensify, allowing the two metropolitan economies to increasingly compete in the global economy with a larger footprint.	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	Inclusion of this method is likely to contribute to an overstatement of economic benefit because the service will only provide an expansion of the District's labor market equivalent to the number of workers who would have a commute to DC workplaces under an hour via mag lev service that significantly reduces travel time compared to other modes. This is likely limited to workers who both live and work near mag lev stations. It is not likely that this increase in households would be sufficient to generate agglomeration effects.
48	Appendix D.4: Economics Impact Analysis Technical Report	D.4C.2 Relative Housing Affordability	C-9	With median prices well above the national average, many households are “priced out” of rental and owner-occupied housing near the District core and major suburban employment centers—Tysons Corner and Alexandria, for example.	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	Median housing costs does not describe the distribution of housing stock by price. This is a misleading statement that overstates the proposed system's ability to increase the labor market. Notably, the \$60 ticket cost would not be affordable to lower income households as a regular commuting cost. The housing market should be analyzed based more granular divisions such as quartiles that assess housing cost relative to the distribution of regional incomes. Additionally, the study should analyze regional consumer expenditure patterns to identify the minimum household income that is likely to generate regular riders at the estimated fair and station access costs.
49	Appendix D.4: Economics Impact Analysis Technical Report	D.4C.2.1.1 Market Synergies	C-14	Air Passenger Origins Airport Access Mode by MSA	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	There is no intraregional air travel. This table overstates the potential synergies, due to the travel times between airports and proposed maglev stations. BWI is the only airport that would be significantly impacted. At BWI maglev may be able to capture a significant number of DC bound passengers due to relative price parity with taxis. The findings in this table should be adjusted to only reflect the passengers arriving and departing from each airport who would experience a significant reduction in travel time to the airport.
50	Appendix D.4: Economics Impact Analysis Technical Report	D.4C.2.1.1 Market Synergies	C-15 and C-16	Dominant Industries for Washington DC....	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	This table contributes to overstating the potential benefit of maglev for two reasons. 1) most of the DC based industries with the highest LQs are very small and 2) the inclusion of DC Inner Suburbs industries are problematic because most of these employment locations would generate very little travel demand due to comparable automotive travel times at significantly less cost. Include the number of employees within each DC industry. Additionally, suburban employment should either be discounted to reflect employment locations that would experienced increased labor market access within a 1 hour commute time due to the construction of mag leg or withhold these industries all together due to the low proximity to mag lev stations.
51	Appendix D.4: Economics Impact Analysis Technical Report	D.4D.2.4.1 Monetized Value for Changes in Travel Time	D-35	2050 SCMAGLEV Ridership by Market Segment	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	Table D-4-19 indicates that 52% of non airport ridership between DC and Baltimore will be non business. Given the wide range of time and cost effective travel options between the two cities, this figure likely overstates demand. A more balanced evaluation would likely show ridership is significantly over estimated. Inflated maglev ridership would also inflate the reported travel time savings estimates. This study should be refined with the inclusion of a price sensitivity analysis to determine a likely capture rate among riders who may experience a travel time savings using maglev.
52	Appendix D.4: Economics Impact Analysis Technical Report	D.4D.2.4 Long-Term (Recurring) Travel Market Impacts	D-39	Figure D.4.6: Baltimore Washington Region Freeway Congestion Map	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	The DEIS assumed roadway travel demand patterns prevalent before COVID-19 initiated a widespread shift to remote work. Looking forward, commute times and congestion levels are likely to be very different and may not be as strong of a push factor to maglev. These changes will also reduce the value of congestion mitigation.
53	Appendix D.4: Economics Impact Analysis Technical Report	D.4D.2.4 Long-Term (Recurring) Travel Market Impacts	D-43	Net Travel Cost Savings	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	The calculation of trip diversions between auto and Maglev assume \$30 a day for auto parking costs but does not include parking at the maglev station or the costs of other modes of travel to the station. A more complete accounting of Maglev travel costs is likely to result in fewer diverted trips. The comparative analysis of trip costs should be updated to account for the full door-to-door cost of each travel mode.

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54	Appendix D.4: Economics Impact Analysis Technical Report	D.4D.2.4.9 Impact on The Revenue (Amtrak and MARC)	D-55	Tabl.4-47: 2030 Rail Ridership and Revenue Loss	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	<p>Revisit these assumptions, the estimated Amtrak and MARC ridership losses are likely over estimated. The prior section noted that few Amtrak Accela passengers travel between DC and Baltimore. Additionally, the discussion does not appear to account for the significant difference in travel cost in return for marginal time savings. This issue lead to a likely overstatement of revenue losses to Amtrak and MARC. International experience with high-speed rail has shown that those services compete with air travel more than traditional rail. The focus on the region's existing rail travel market indicates that the likely market demand for maglev may be much lower than indicated in this document.</p> <p>This analysis should include both an assessment of travelers who could experience a time savings using mag lev service and an price sensitivity analysis to determine how current MARC and Amtrak customers would value the time savings relative to how much they can afford to spend for regular travel costs.</p>
55	Appendix D.6: Aesthetics, Visual Quality and Light Emissions	App.D, D.6.1.3.2	6.14	Table D.6-1: Terms and Definitions		Include a definition of "Existing Visual Sensitivity". It is not included in the glossary in Table D.6-1
56	Appendix D.6: Aesthetics, Visual Quality and Light Emissions	App.D, D.6.1.3.2, Table D.6-3	6.15	Degree of Anticipated Visual Impact (multiple cells)	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	The massing studies as shown are inadequate. They should include multiple views (including both birds-eye and street-level) for every area of above-grade impact for all Washington, DC sites. Clarify how Anticipated Visual Impacts of 3-4 story head house structure in the context of downtown Washington, DC would create Low to Moderate Visual Impacts. Visual Impacts of a 4-story building within historic L'Enfant public lands and nearby landmarks would be higher.
57	Appendix D.6: Aesthetics, Visual Quality and Light Emissions	App.D, D.6.1.3.2, Table D.6-4	6.15	Degree of Anticipated Visual Impact (multiple cells)	2. Ensure effective integration of SCMAGLEV Project - including station areas, ancillary facilities, and above-grade guideways - with immediate sites, adjacent neighborhoods, and citywide context	The massing studies as shown are inadequate. They should include multiple views (including both birds-eye and street-level) for every area of above-grade impact for all Washington, DC sites. Clarify how Anticipated Visual Impacts of 50' structure plus a substation in the context of urbanized Washington, DC would create Relatively Imperceptible Visual Impacts. Visual Impacts of a 50' structure and substation would be higher. Also need more information on approximate overall building sizes of anticipated power substation and fresh air/emergency egress facilities.
58	Appendix G.01 Part A (Facility Parcel Impact Summary – Report and Attachment 1)	NA	54	Drawing 46 of 85	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	<p>The Oak Hill Property owned by the District of Columbia in Maryland is shown as a Laydown Area of Temporary impact for Alignment J in the Parcel Impacts diagram. There are multiple public facilities and uses in this area including the New Beginnings youth Development Center; the DC National Guard Youth Challenge Academy; Central Administration Building, which is used by the District of Columbia Department of Youth and Rehabilitation Services and the District of Columbia Office of Contracts and Procurement Surplus Property Division; District of Columbia Department of Public Works Fuel Point and Vehicle Repair Shop Building; Wings over America Raptor Sanctuary; o Forest Haven Hospital – closed hospital building(s) – class action legal action under purview of the Department of Disability Services has not concluded; Forest Haven Cemetery; DOL Woodland Job Corps Program; and BG&E subterranean power conduits situated along Old Portland and River Roads to cross US 32 that support the NSA. The DEIS does not identify impacts to these facilities and uses and makes no mention or discussion of them.</p> <p>The FEIS must identify all public facilities, uses, and functions on this site and adjacent sites. The DEIS must identify the temporary and permanent impacts of the proposed project to these facilities, uses and functions; work with the appropriate District agencies and property owners to develop mitigations; and detail mitigations that address any negative impacts to these agencies and their operations in the FEIS. If the project is anticipated to displace any facility, use and/or function at Adams Place, NE, the FEIS shall ensure appropriate mitigations are included, including the identification and procurement of alternative locations for these uses, and reconstruction of replacement facilities at sponsor expense, prior to project work at the subject site.</p>
59	Appendix G.02 Part D: DEIS Drawings - Location Map, Structural Typical Sections and Details)	NA	14	Drawing Number: PP-04	1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project	<p>The Adams Place, NE site (2100 Adams Place, NE and 2200 Adams Place, NE) is shown as the launch site of the Tunnel Boring Machine in this drawing. These parcels are owned by the District of Columbia, representing approximately six acres of the Adams Place, NE site, and have approximately 12 structures that are home to mission critical uses for multiple District agencies, including the Office of the State Superintendent of Education, the Department of General Services, the Department of Public Works, the Office of Contracting and Procurement, and the District of Columbia Public Schools. For example, the Office of the State Superintendent of Education uses this facility to store school buses and the Department of Public Works has a fueling station on the site. These are only two of the many ways the District uses these sites. Additionally, a private facility abutting the subject site is leased by the District to store Fire and Emergency Medical vehicles. The DEIS does not identify impacts to these facilities and uses, and makes no mention or discussion of them.</p> <p>The FEIS must identify all public facilities, uses, and functions on this site and adjacent sites. The DEIS must identify the temporary and permanent impacts of the proposed project to these facilities, uses and functions; work with the appropriate District agencies and property owners to develop mitigations; and detail mitigations that address any negative impacts to these agencies and their operations in the FEIS. If the project is anticipated to displace any facility, use and/or function at Adams Place, NE, the FEIS shall ensure appropriate mitigations are included, including the identification and procurement of alternative locations for these uses, and reconstruction of replacement facilities at sponsor expense, prior to project work at the subject site.</p>

District of Columbia Office of Planning



Office of the Director

October 1, 2018

Mr. Brandon Bratcher
Environmental Protection Specialist
USDOT Federal Railroad Administration
Office of Program Delivery
1200 New Jersey Avenue, SE, MS-20
Washington, DC 20950

RE: Non-Concurrence with the Baltimore-Washington Superconducting Magnetic Levitation Train System Project Draft Alternatives Report dated August 31, 2018

This letter is the response from the District of Columbia Office of Planning (DCOP) to the Baltimore-Washington Superconducting Magnetic Levitation Train System (SCMAGLEV) Project Draft Alternatives Report (PDAR) circulated by United States Department of Transportation (USDOT) Federal Railroad Administration (FRA) on August 31, 2018.

FRA requested a concurrence determination and comments from DCOP and other District agencies by October 1, 2018. Please note that District Department of Transportation (DDOT), Department of Energy and Environment (DOEE), and State Historic Preservation Office (SHPO) will submit their own comments in response to the PDAR with separate letters.

DCOP understands that the PDAR represents a component of the overall Environmental Impact Statement (EIS) process as required by the National Environmental Policy Act (NEPA), and for which the USDOT FRA is the Lead Agency.

DCOP is charged with shaping and guiding growth in the District and is a unique planning agency, since it is charged with both municipal and state-level land use functions. These functions include urban design, development review, neighborhood planning, long-range land use planning, historic preservation, state data and growth forecasts, and geographic information systems.

After careful review of the PDAR, DCOP has determined nonconcurrence with the PDAR. DCOP finds that the PDAR screening process is too premature and unsubstantiated to eliminate the station options in NoMA from further consideration. DCOP strongly urges FRA to carry forward all four station options to the draft EIS stage, which will ensure that appropriate technical analyses can be conducted and used to inform further option screening. In addition, DCOP in consultation with the Department of General Services (DGS), concurs with carrying forward the two Rolling Stock Depot (RSD) options in Maryland.

NoMA and Mt. Vernon Square SCMAGLEV Station Options

NoMA and Mt. Vernon Square are unique and distinctive neighborhoods in our nation's capital. Each has been carefully planned by DCOP through land use policy and design plans to help manage their growth and evolution. NoMA has experienced significant development of mixed-use projects in recent years and DCOP continues to plan for its growth. Mt. Vernon Square is among the most historically significant neighborhoods in the District and is nearly built out.

A project proposal of the magnitude of SCMAGLEV has the potential to cause significant disruption to these neighborhoods as SCMAGLEV requires analysis of the District's land use policies, which was not undertaken in the PADR. In addition, FRA should refer to DDOT for transportation policies as those should also be analyzed for these neighborhoods.

All four station options in the District (two at Mt. Vernon Square, and two at NoMA) should be appropriately analyzed and considered for a project of this scale, which likely will have permanent effects on the built form, economy, housing and commercial markets, demographics, resilience, and public services and infrastructure systems of our nation's capital.

Carrying forward all four station options to the draft EIS stage will help ensure appropriate technical evaluations are conducted and subsequently used for appropriate comparison of options.

While DCOP understands that no preferred station was selected in the PADR, the PADR screened out two station options (NoMA above-ground and underground) from further consideration. Specifically, page 49 of the PADR states, "a NoMA location is an area with chronic street traffic congestion that would connect with only one Metro line – Red – which is the most overburdened line in the Metro system and is not cost effective."

DCOP finds the above rationales inadequate. Citing current rather than future traffic and transit conditions is not an appropriate manner to exclude station locations for a project with a build year of 2028. An adequate assessment would require a transportation analysis that accounts for the future transportation network and land use inputs associated with the forecast year.

The PDAR then compares the NoMa Above-Ground and Underground options to each other, asserting that the underground station would present a “more onerous” multi-level vertical transition to the nearest Metro Station (NoMa-Gallaudet) and add \$1 billion in costs than the SCMAGLEV underground station option. Again, DCOP finds that, in the absence of technical review and analysis, the above assertions are unsubstantiated.

Technical details for each of the stations would be necessary to determine the onerousness of station access for all four station options in the District so they can be properly compared and then evaluated for potential elimination. The PDAR contains only high-level incremental cost estimates for each of the four station options—cost estimates that are relatively similar to one another for a project of the magnitude of SCMAGLEV. Making a well-founded argument based on costs would require cost estimation assumptions for each station option as well as disclosure and detailing of assumptions for the total project cost. This would enable the evaluation of proportional cost comparisons relative to the overall project cost and across station options in order to assert station option feasibility based on costs.

The draft EIS analysis will enable FRA and stakeholders to clearly identify the impacts of each station option accounting for foreseeable growth and the adopted land use, economic, design, and infrastructure plans and policies in the District, and to then evaluate tradeoffs across the collective impacts and mitigations for each of the options to inform the elimination of one or more options from further consideration.

A thorough draft EIS analysis will provide FRA with a much more robust, data-driven process for weighing benefits and costs of each of the four station options, and local and regional stakeholders to attain a far better understanding of the project, its impacts, and appropriate mitigations to assist with decision-making regarding option elimination and potential selection of a superior alternative.

Rolling Stock Depot Options and Tunnel Boring Machine Staging in Maryland

The draft EIS process should take careful account of existing conditions and future plans for those properties. The District’s DOEE and the SHPO will each provide comments under separate letters in relation to these properties.

In consultation with the DGS, DCOP conveys the following comments for District-owned properties in Maryland:

- Ensure a full inventory is assembled of District-owned properties and uses in Maryland that could be potentially affected by each of the SCMAGLEV project alternatives;
- Ensure that a full technical analysis of project impacts to the above properties and uses is conducted, including impacts due to Tunnel Boring Machine (TBM) staging; general construction staging; construction of new RSD facilities and other ancillary facilities; and the placement and operation of permanent RSD and other ancillary facilities.

- Ensure that impacts to existing uses and operations on these properties are fully accounted for and properly mitigated, including for ensuring continuity of operations and delivery of services that are currently located at the subject properties, which include the following:
 - New Beginnings Youth Development Center;
 - Environmental conservation easement surrounding Little Patuxent River;
 - DC National Guard Youth Challenge Academy;
 - Central Administration Building, which is used by the District of Columbia Department of Youth and Rehabilitation Services and the District of Columbia Office of Contracts and Procurement Surplus Property Division;
 - District of Columbia Department of Public Works Fuel Point and Vehicle Repair Shop Building;
 - Wings over America Raptor Sanctuary;
 - Forest Haven Hospital – closed hospital building(s) – class action legal action under purview of the Department of Disability Services has not concluded;
 - Forest Haven Cemetery;
 - DOL Woodland Job Corps Program;
 - BG&E subterranean power conduits situated along Old Portland and River Roads to cross US 32 that support the NSA;
 - Anne Arundel County proposal for new 3-million-gallon above-ground water storage tank and shift of utility provider; and

Please see Attachment 1 for District property boundaries, land uses and program, and Attachment 2 as reference diagram provided to DGS by BWRR.

DCOP Guiding Principles for SCMAGLEV Project

Based on preliminary review of existing District policies and plans, DCOP furnishes the following Guiding Principles to inform updates to the current PDAR:

1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by SCMAGLEV Project:
 - a. Provide high quality station design that is responsive to surrounding urban program;
 - b. Provide effective vertical circulation connections from the street level to underground stations;
 - c. Minimize spillover effects of project on local neighborhoods and ensure that unavoidable spillover impacts are appropriately mitigated; and
 - d. Architecture: Appropriately balance contemporary architectural features of the project with those of surrounding neighborhoods, including as related to scale, detail, historic integrity, and uses in the surrounding neighborhoods.

2. Ensure effective integration of SCMAGLEV Project—including station areas, ancillary facilities, and above-ground guideways—with immediate sites, adjacent neighborhoods, and citywide context:
 - a. Immediate Sites: effects on historic preservation, design, resilience, economic and physical impacts, and infrastructure loading and sufficiency;
 - b. Adjacent Neighborhoods: same as above, with focus on effects on real estate markets, demographics, and disparate impacts on underserved neighborhoods; and
 - c. Citywide Context: Ensure the project includes measures to provide expanded capacity of services and infrastructure systems to service the project demands in line with District policies and forecasts.
3. Prioritize intermodal systems effectiveness and efficiency:
 - a. Ensure that station users can access SCMAGLEV stations through as many modes as possible in a safe, comfortable and non-congested manner;
 - b. Maximize ease of transfer between SCMAGLEV and local transportation modes; and
 - c. Enhance connections to local mobility systems.

DCOP Technical Comments on SCMAGLEV PDAR

Based on the above, DCOP furnishes the following technical comments to inform updates to the current PDAR:

1. Preferred Alternative: DCOP strongly supports deferral of the selection of a preferred alternative until full analysis of each of four station options (in addition to the “No Action” alternative) in the District is conducted through a draft EIS process. As stated previously, this will enable the collective impacts of each alternative to be thoroughly analyzed, tradeoffs across them to be evaluated, and appropriate mitigations to be identified, considered and formulated PRIOR TO potential selection of the PREFERRED ALTERNATIVE. DCOP strongly believes that only once a deep understanding of impacts and tradeoffs has been developed as part of the EIS process that a preferred alternative (or alternatives) can or should be identified for a project of this nature and magnitude.
2. “No Action” Alternative: this alternative should account for appropriate background development of both public and private capital projects, infrastructure, transportation projects, and urban development.
3. Full analysis of the following impact areas should be conducted for each project alternative (including affected District-owned properties in Maryland):
 - a. Affected Environment;
 - b. Environmental Consequences;
 - c. Avoidance, minimization and mitigation;
 - d. Land Acquisitions and Displacements;
 - e. Land Use and Zoning;

- f. Consistency with Local Plans, including the District’s Comprehensive Plan, the District’s Long-Range Transportation Plan (MoveDC), and additional land use and design plans, a list of which is provided in Attachment 3 to this letter; note that these plans may be updated or new plans adopted prior to the 2028 project build year;
 - g. Neighborhoods, Demographics, and Community Resources;
 - h. Cultural Resources;
 - i. Resources of Interest;
 - j. Past, present and reasonably foreseeable future projects, including buildings and infrastructure;
 - k. Secondary effects; and
 - l. Cumulative impacts.
- 4. Onsite Impacts: DCOP is generally supportive of distributing access points across the station area in the District rather than concentrating them at one or few locations, with the intention of minimizing spillover effects on immediate neighborhoods.
- 5. Offsite Impacts: Impacts to immediate sites, adjacent neighborhoods and on a citywide basis that arise from spillover effects of each project alternative must be thoroughly analyzed and integrated into overall transportation and economic modelling for this effort; appropriate mitigations should be studied, including changes to project development assumptions that will minimize impacts on local neighborhoods—including disparate impacts on underserved communities.
- 6. Mobility:
 - a. Identify any ancillary parking facilities that would be necessary for each project alternative; and
 - b. Identify all impacts to local mobility infrastructure and systems across all modes, including:
 - (i) Vehicular ingress, egress, pick-up and drop-off;
 - (ii) Pedestrian mobility, including trip generation and the effects of pedestrian travel behavior on transportation network components, such as crosswalks, sidewalks, signal timings, etc.; and
 - (iii) Effects on bicycle infrastructure and on-demand systems.

It is important to note that any project will be evaluated by DCOP against land use policies relevant at the moment of entitlement and permit applications. In addition, please note that the District of Columbia State Historic Preservation Office (SHPO) is housed within DCOP and we are ensuring close coordination with them.

The SCMAGLEV EIS project team should continue to coordinate with local communities and other District stakeholders. DCOP looks forward to continued engagement in the EIS process.

If you have questions or concerns, please contact Rogelio A. Flores, Lead Planner, Infrastructure, Facilities and Capital Planning Unit, at 202-741-0815 or via e-mail at rogelio.flores@dc.gov.

Sincerely,



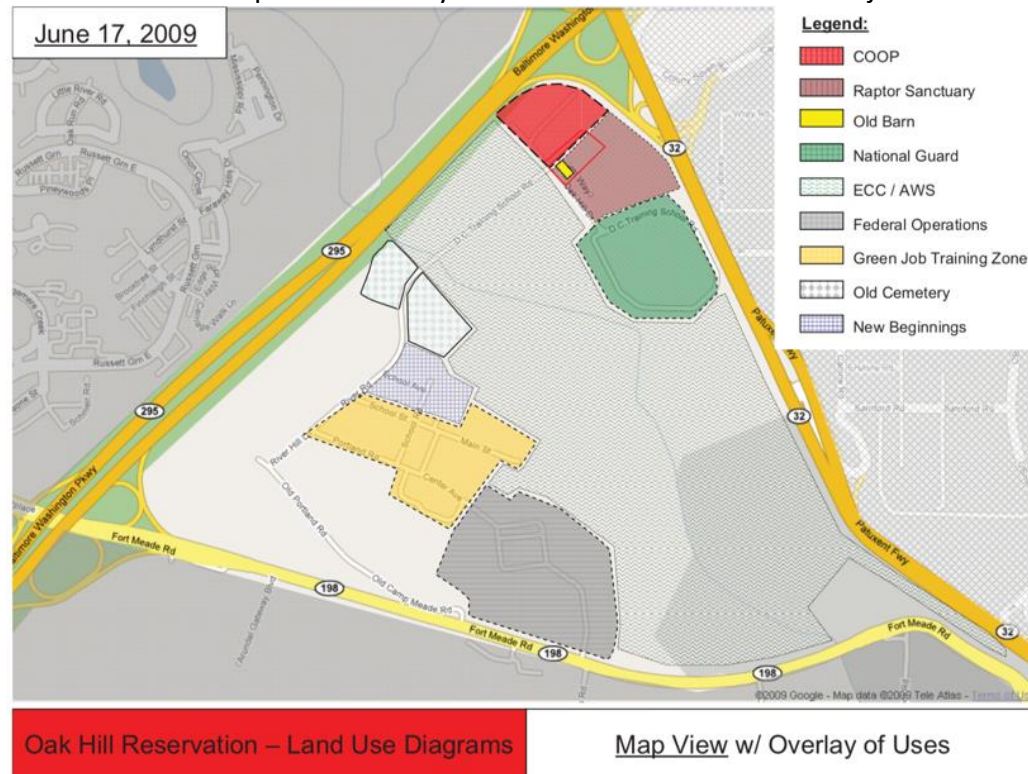
Eric D. Shaw

Attachments

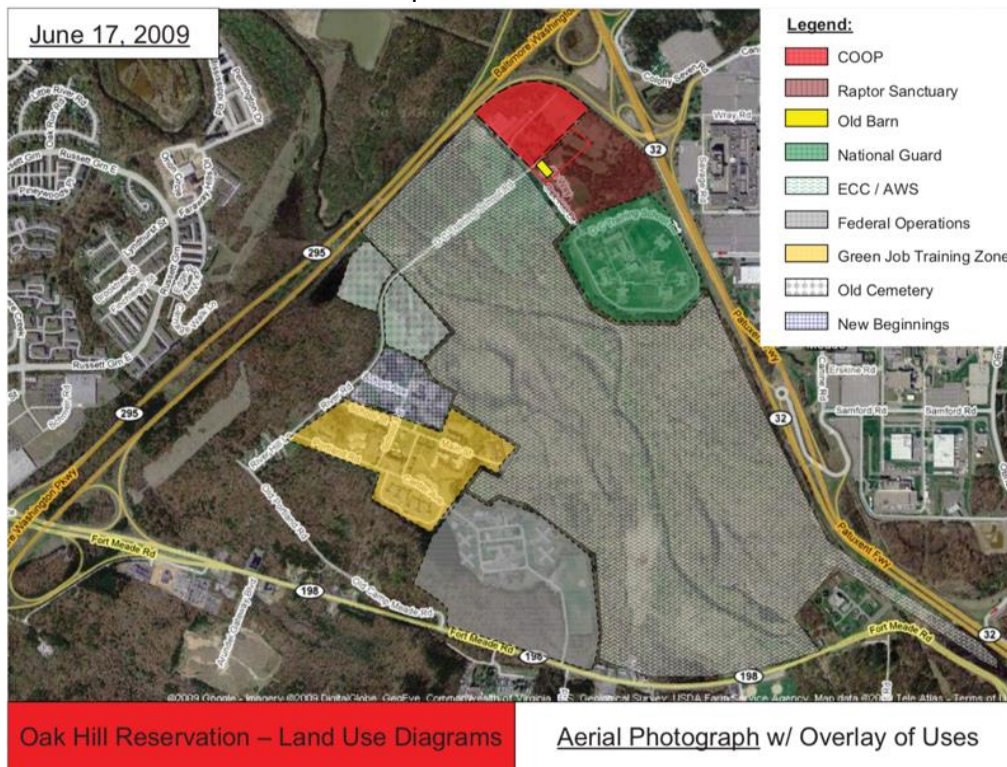
cc: Brian Kenner, Deputy Mayor for Planning and Economic Development
Greer Gillis, Director, District of Columbia Department of General Services
Jeff Marootian, Director, District of Columbia Department of Transportation
Tommy Wells, Director, District of Columbia Department of Energy and Environment

ATTACHMENT 1:

District-Owned Properties in Maryland Relevant to SCMAGLEV Project



Source: District of Columbia Department of General Services



Source: District of Columbia Department of General Services

ATTACHMENT 1:

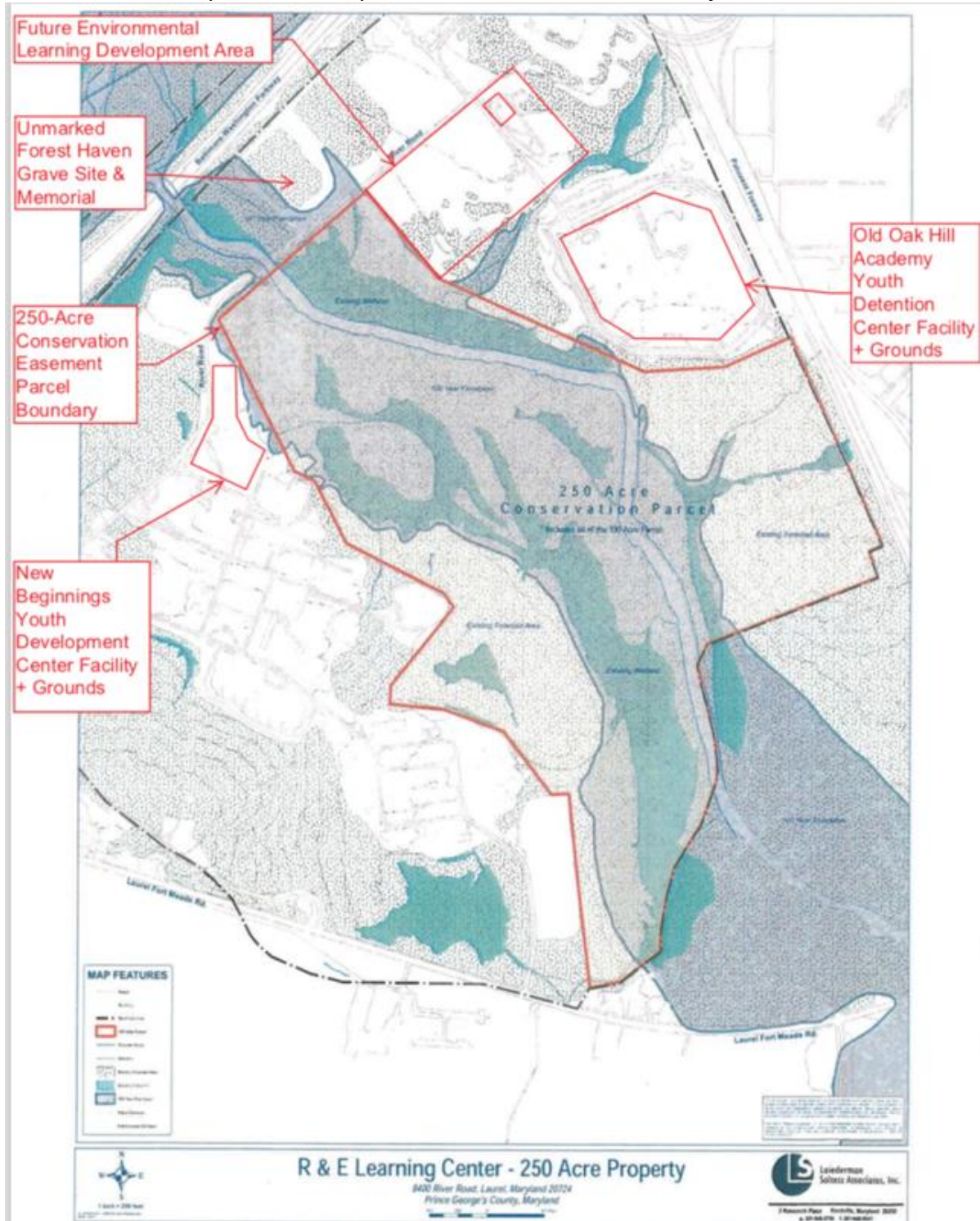
District-Owned Properties in Maryland Relevant to SCMAGLEV Project



Source: District of Columbia Department of General Services

ATTACHMENT 1:

District-Owned Properties in Maryland Relevant to SCMAGLEV Project



Source: District of Columbia Department of General Services

ATTACHMENT 2:

SCMAGLEV Proposals on District-Owned Properties in Maryland

Figure 1: DC Property Area

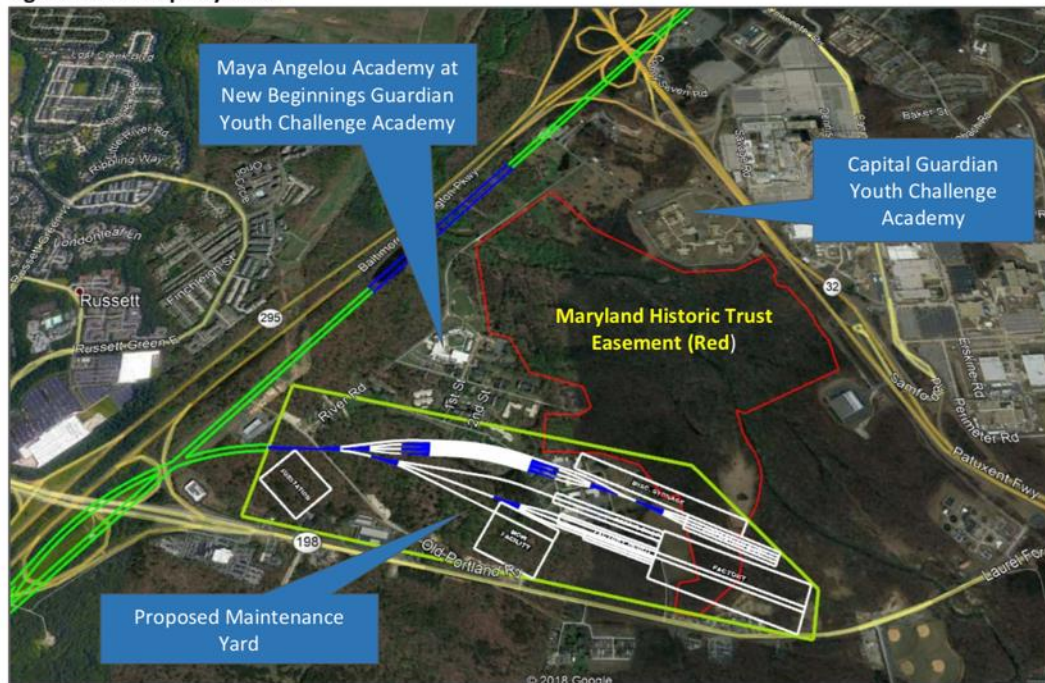
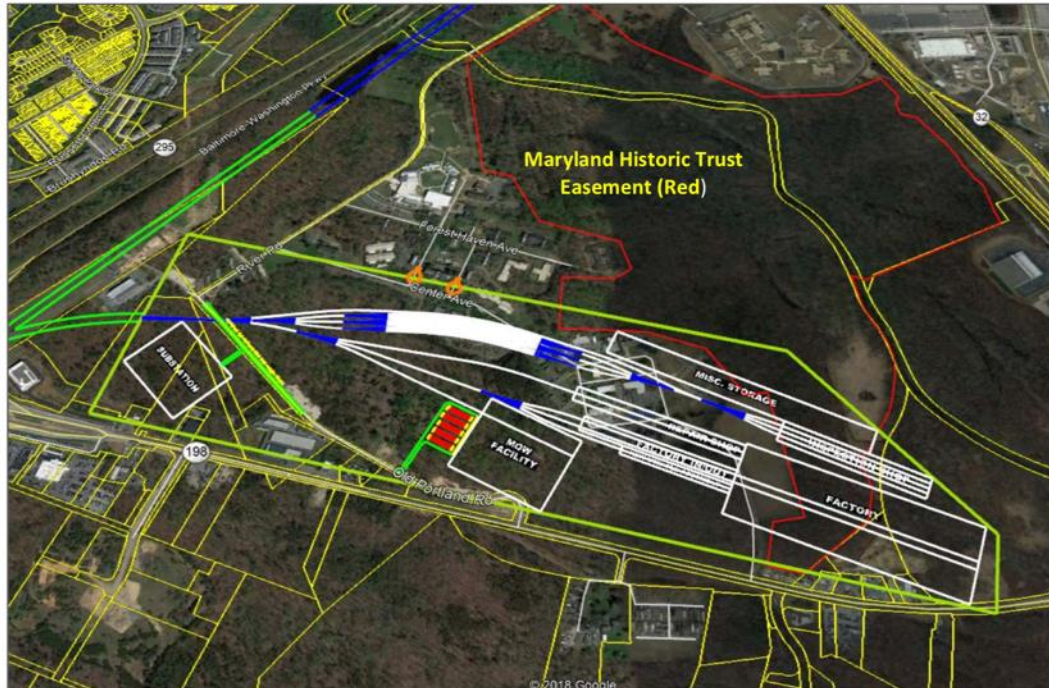


Figure 2: Maintenance Yard Layout



Source: July 16, 2018 Memo from Mark Berger and Liviu Sfintescu to BWRR

ATTACHMENT 3: List of Applicable Land Use and Design Plans

1. [Downtown East Reurbanization Strategy \(2018\)](#)
2. [District of Columbia Comprehensive Plan \(Comp Plan\) \(2011\)](#)
3. [Mt Vernon Square District Priority Projects \(2010\)](#)
4. [Shaw Neighborhood Neighborhood Investment Fund Plan \(2008\)](#)
5. [NoMA Vision Plan and Development Strategy \(2006\)](#)
6. [Chinatown Cultural Development Small Area Plan \(2005\)](#)
7. Convention Center Strategic Development Plan (2005) [please contact DCOP for this document]

District of Columbia
Office of Planning



STATEMENT FROM THE DIRECTOR

January 25, 2021

Statement from Director Andrew Trueblood on the Baltimore-Washington Super Conducting Maglev Project DEIS

The District of Columbia Office of Planning (OP) has been an active participant in the National Environmental Policy Act (NEPA) process for the Baltimore-Washington Super Conducting Magnetic Levitation Project (SCMAGLEV) since its inception. On January 15, 2021, the Federal Railroad Administration (FRA) released a [Draft Environmental Impact Statement \(DEIS\)](#) for public comments with a deadline of April 22, 2021. OP recommends that District stakeholders undertake a detailed review of the DEIS to ensure that a Preferred Alternative identified in the Final Environmental Impact Statement (FEIS) meets the long-term needs of the District. In support of stakeholders who intend to review and submit comments, OP is issuing this statement to highlight principles we will be using in our review of the DEIS.

The SCMAGLEV will have significant impacts on the District. The proposed station in Mount Vernon Square and alignment underneath New York Avenue would change the urban environment and have substantial construction and long-term operational implications on nearby properties. The connection between Downtown DC and Baltimore, with a possible extension to New York City, has the potential to considerably impact the District's housing and office markets, its economy, nearby neighborhoods, as well as local and regional transportation networks.

OP will be reviewing the DEIS with specific interest in how the guiding principles in our [October 1, 2018 letter](#), written in response to FRA's August 31, 2018 Project Draft Alternatives Report (PDAR), were integrated. These principles include:

1. Ensure continued and enhanced quality of life for those who live, work, and visit areas affected by the SCMAGLEV Project.
2. Ensure effective integration of the SCMAGLEV Project—including station areas, ancillary facilities, and above-ground guideways—with immediate sites, adjacent neighborhoods, and citywide context.
3. Prioritize intermodal systems effectiveness and efficiency.

The October 1, 2018 letter also notes that the PDAR inappropriately eliminated all station area options within the District except for Mount Vernon Square for analysis in the DEIS. OP notes that the premature elimination of the station options in NoMa prevents DEIS commenters from comparing reasonable alternatives and considering tradeoffs before a specific alternative is chosen.

Attachment 3: Statement from Director Andrew Trueblood on the Baltimore-Washington Super Conducting Maglev Project DEIS (January 25, 2021)

OP also requested that the DEIS document the full analysis of the Affected Environment, Environmental Consequences, Land Use, Consistency with Local Plans, Reasonably Foreseeable Future Projects, and Cumulative Impacts and provided detailed technical comments for incorporation into DEIS analyses of impacts.

OP will be reviewing the DEIS to ensure that all the above were considered and incorporated and will provide comments to FRA by April 22, 2021.

We encourage the broad range of stakeholders who could be impacted by this project including residents, Advisory Neighborhood Commissioners, Councilmembers, nearby businesses, and business improvement districts to review the DEIS to ensure there are not lasting negative consequences on Mount Vernon Square and the District. A comment form and more information on how to submit written comments can be found at www.bwmaglev.info.

Attachment:

[October 1, 2018 Non-Concurrence Letter from the Office of Planning to the Federal Railroad Administration on the Baltimore-Washington Superconducting Magnetic Levitation Train System Project Draft Alternatives Report, Dated August 31, 2018](#)