



**Office of the County Executive
STEUART PITTMAN**

May 21, 2021

Ms. Lauren Molesworth
Maryland Transit Administration
6 Saint Paul St., Baltimore, MD 21202

Dear Ms. Molesworth:

America needs big infrastructure improvements to reduce greenhouse gas emissions, move people between work and home more efficiently, and compete in the fast-paced, ever-changing 21st-century global economy. As a country, we have for too long prioritized highways and airports over rail infrastructure while much of the rest of the world built high-speed rail networks to connect major economic hubs. There is no denying we are behind in connecting our cities with energy-efficient, high-speed mass transit solutions. There is also no denying that all infrastructure projects – whether for a new highway or a runway expansion or a rail line – will naturally impact nearby communities and the surrounding environment. That is why governments must both welcome high-speed transit proposals and carefully document and consider potential impacts to communities and the environment.

This letter documents Anne Arundel County's findings regarding potential community and environmental impacts that may result from the construction and operation of the proposed SCMAGLEV, and represents the County's official public response to the Draft Environmental Impact Statement. I encourage the Maryland Transit Administration to carefully consider these potential impacts in its review of the project. Regardless of the outcome of this review, I hope that our federal, state and private partners will continue to evaluate ways to deliver high-speed transit options to our region and across the country.

The following comments were provided by Anne Arundel County's Office of Planning and Zoning, Department of Inspections and Permits, Department of Public Works and Office of Transportation.

- I. There is a potential for the following impacts to neighborhoods associated with the Build Alternatives J-01 through J-06 in Anne Arundel County:
 - A. Multiple residences in the Maryland City neighborhood, as well as community facilities including Resurrection Church, Monarch Academy, and Brock Bridge Elementary School, would likely experience increased noise.

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- B. A tunnel portal would be located within 250 feet of residences within the Fort Meade neighborhood on Costin Loop. Residents would likely experience impacts due to changes in visual quality from the removal of trees and presence of the portal. Residences located on Laurel Hill Road, Potters Hill Road, and Baldy Avenue would likely experience vibration impacts.
 - C. A fresh air and emergency egress facility would be located along Harmans Road in the Severn neighborhood. The facility would result in one residential displacement. Residents along Harmans Road, Post Road, Mill Crossing Court, and Harmons Farm Court would likely experience increased noise and changes in visual quality due to the presence of the fresh air and emergency egress facility and associated removal of trees. Residents on Matthewstown Road, David Victoria Lane, and Hekla Lane would also likely experience changes in views and visual quality due to the presence of the fresh air and emergency egress facility and associated removal of trees.
 - D. A fresh air and emergency egress facility would be located in an industrial area between Railroad Avenue and Telegraph Road in the Severn neighborhood. The fresh air and emergency egress facility would require the full permanent acquisition of an industrial parcel. The facility would likely result in noise impacts for residences along Old Coaling Road and to the east of Telegraph Road. However, this would not impact community access as the parcels are zoned for industrial use and not used to gain access to other community features.
 - E. The Snowden Cemetery, a private family cemetery within the Patuxent Research Refuge, would be acquired and displaced.
 - F. The Training School Cemetery, within the Maryland City neighborhood, is immediately adjacent to the viaduct. The viaduct would likely impact cemetery visitors due to increased noise and changes to aesthetics.
 - G. The New Beginnings Youth Development Center/Maya Angelou Academy, located at 8400 River Road in Laurel, a secure residential treatment facility for young males, would likely experience increased noise and changes to views and visual quality from the removal of trees and the presence of the viaduct and ancillary facilities.
- II. There is a potential for the following impacts to neighborhoods associated with the Build Alternatives J1-01 through J1-06 in Anne Arundel County:
- A. A viaduct and portal would likely impact multiple residences in the Maryland City neighborhood, as well as community facilities including Resurrection Church, Monarch Academy, and Brock Bridge Elementary School, due to increased noise and changes in visual quality.
 - B. The viaduct and portal would require property acquisition from forested areas and of Maryland City Park, including the removal of two baseball fields, two multipurpose fields, and a paved trail. Park users would have to access these amenities at Montpelier Park, located a mile away, which includes baseball fields,

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- and Brock Bridge Elementary School, located a mile and a half away, which includes baseball fields, multipurpose fields, and paved paths and sidewalks.
- C. Vibration impacts would likely occur at multiple residential properties above tunnel portions of the alignment within the Maryland City neighborhood and at one residential property in the Fort Meade neighborhood.
 - D. Build Alternatives J1-01 and J1-04 include elevated ramps to access the MD 198 Transit Maintenance Facility (TMF) within the Maryland City neighborhood. The ramps would be located just west of the BWP within 150 feet of the Thomas J.S. Waxter Children's Center, residences on Sudlersville Street, and apartments on Andrew Court within the Ashley Apartments complex. The viaduct would require the removal of a forested buffer that currently exists between the BWP and these communities, including the Thomas J.S. Waxter Children's Center, and would present a stark change from current views. These residents and the Thomas J.S. Waxter Children's Center would likely experience impacts due to increased noise and changes to visual quality. Residents on Bushy Ridge Road, Carriage Walk Court, Carriage Walk Lane, and Sagewood Road would also likely experience noise impacts.
 - E. A fresh air and emergency egress facility would be located within 500 feet of residences within the Fort Meade neighborhood on Allsworth Court. Residents would likely experience impacts due to changes to visual quality.
 - F. A fresh air and emergency egress facility would be located along Harmans Road in the Severn neighborhood and would result in a residential displacement. In addition, residences to the south along Harmans Road, Post Road, Mill Crossing Court, and Harmons Farm Court would likely experience noise impacts and changes in visual quality due to the presence of the fresh air and emergency egress facility and associated removal of trees.
 - G. Residents on Matthewstown Road, David Victoria Lane, and Hekla Lane would also likely experience changes in views and visual quality due to the presence of the fresh air and emergency egress facility and associated removal of trees.
 - H. A fresh air and emergency egress facility would be sited in an industrial area between Railroad Avenue and Telegraph Road in the Severn neighborhood and would likely impact residences along Old Coaling Road and to the east of Telegraph Road due to increased noise. The fresh air and emergency egress facility would require the full permanent acquisition of an industrial parcel. However, this would not impact community access as the parcels are zoned for industrial use and not used to gain access to other community features.
 - I. One residential property in the Severn neighborhood of Anne Arundel County would be displaced under all of the Build Alternatives. However, many residential properties are in close proximity to Project elements or are partially located within the limits of disturbance (LOD), and partial acquisition may be required.
 - J. The Maryland City neighborhood would be adjacent to and above the SCMAGLEV project in all Build Alternative alignments.

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Large area impacts to land use would be associated with project-related buildings, construction laydown areas, and areas for stormwater management, including areas targeted for redevelopment in Anne Arundel County. Permanent topographical changes would occur from grading or filling the landscape. Groundwater pumping could result in topographic subsidence. All of these land use changes have the potential to impact the environment. The following comments and questions specifically address these potential environmental impacts.

- K. All Build Alternatives would permanently impact forests, ecologically sensitive areas, and water resources. Permanent watershed impacts associated with all Build Alternatives would be more evident in the Little Patuxent and Patuxent watersheds. Build Alternatives J-01 and J-04 would directly affect floodplain functions, riparian habitat, nontidal wetlands of special state concern, water quality, surface hydrology, and wildlife and aquatic species (including rare, threatened, or endangered species or species of concern) in the Little Patuxent River Watershed, river, and its surrounding natural habitat within the watershed from the viaduct piers, maglev systems, and the TMF.
- B. There are potential surface water impacts to the following tributaries of the Chesapeake Bay: Patuxent River, Little Patuxent River, Anacostia River, and Beaverdam Creek.
- C. The project would likely result in an increase to corridor-wide criteria pollutant and greenhouse gas emissions, particularly in areas around station locations, due to increased traffic.
- D. The United States Fish and Wildlife Service (USFWS) noted several areas of concern where the Build Alternatives could interfere with the National Wildlife Refuge System, specifically the Patuxent Research Refuge. The concerns included impacts to high-quality habitat for rare, threatened, endangered, and protected species; disruption to established vegetative communities; impacts to forests and related bat communities; impacts to birds, bats, and pollinators from trains passing by; impacts to recreational activities including hunting, fishing, and hiking; and impacts to historic cemeteries on site. Areas of the Patuxent Research Refuge have known unexploded ordnances. The USFWS also noted that in many areas of the Patuxent Research Refuge, prescribed burns occur to manage vegetation that could interfere with project operations. The USFWS also stated that proposed Project elements affecting the Patuxent Research Refuge are incompatible with the purpose and mission. Furthermore, the USFWS noted that the land transfer process for the Patuxent Research Refuge in Maryland would require legislative action.
- E. Environmental justice impacts could occur along the length of the Project corridor, particularly in proximity to aboveground construction, including the stations, viaduct, tunnel portals, TMF sites, and ancillary facilities. Of the 124 block groups within the Project Affected Environment, 102 block groups exceed one or more of the environmental justice thresholds. Of the 102 block groups with environmental justice populations, 59 contain minority groups, ten have

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low-income residents, and 33 include both minority and low-income groups. Impacts include full-parcel acquisitions; a decrease in the level of transportation service in residential areas; direct impacts to community facilities, including parklands, aesthetic, and visual changes; and, direct risk of hazardous materials, noise, and vibration.

- F. All Build Alternatives would impact historic resources. In Anne Arundel County, direct, permanent visual, noise, and vibration impacts to the National Park Service's Baltimore- Washington Parkway (listed on the National Register of Historic Place) and the D. C. Children's Center - Forest Haven District (hospital with cemetery; National Register of Historic Places Eligible) would occur. The visual prominence of SCMAGLEV System elements would alter the scenic character along and above the BWP. The viaduct elements would be located up to 150 feet higher than the elevation of the travel lanes of the BWP and would cross over the BWP to access the TMF. Given that the Potomac Group sediments lie close to the surface and are believed to be 1,000 feet beneath the surface, there is a potential for an adverse impact to fossil record. Several other historical or archeological resources in Anne Arundel County would be partially or fully destroyed by construction with all or some of the Build Alternatives.
- G. All Build Alternatives have the potential to encounter naturally occurring asbestos, radon gas, landslide prone soils, acid producing soils, mines, and fossils during construction. Health and safety risks from hazardous materials and solid waste could arise as a result of exposure to contaminants and could produce adverse health effects. Other potential risks to public health and safety could arise from air quality impacts, impacts to geologic resources, and electromagnetic fields/electromagnetic interference. Impacts to groundwater from the Build Alternatives, particularly Build Alternatives J1-01 through J1-06, could occur in locations of tunnel constructed in both the Patapsco aquifer and Patuxent aquifer (i.e., important sources of water supply in Maryland) in Anne Arundel County and Prince George's County, particularly in or near wellhead protection areas. Long-term noise impacts range from moderate to severe.
- R. Page ES-19: Impacts to groundwater aquifers should be added to the Environmental Resources Impacts table.
- I. Page 3-34: Report proposes a TMF at Old Portland Road near MD198 -- the County is coordinating with the DC government that operates a Youth Detention Center at that location to site a new Elevated Water Storage Tank to serve MD City.
- J. Page 3-37: Table 3.4-6 lists no County water or sewer utilities that would require relocation. Several key water and sewer utilities run east-west along the MD198; MD32; MD175; MD100 MD170 corridors that could be bisected by the SCMAGLEV alignments.
- K. Page 4.1-7: Report should identify where TBM method vs. cut/cover method for tunnel construction is expected to occur. Also, the report notes "top down" construction method to build underground facilities; will this require extensive well

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points to lower groundwater and how will that affect local aquifers and private wells?

- L. Page 4.1-9: Report notes need to construct 100 foot high retaining walls and relocation of Little Patuxent River. The area already suffers from recurring flooding of the Patuxent system and channelization may lead to reduced flood plain areas and more flooding, not to mention the overall impacts to the ecosystem by virtue of relocating a river.
 - M. Page 4.10-10: The map is limited to showing "Wellhead Protection Areas" but the entire length of the tunnel and viaduct span the County's groundwater recharge areas for the Upper, Lower Patapsco and the Patuxent formations of the Potomac Aquifer. The potential impacts to the aquifer's water recharge capacity and water quality are not well developed in the report. For instance, if the tunnel penetrates each of the formations, thereby penetrating the confining clay layers, then how will the tunnel be sealed so as to preclude leakage across the formations? This concern is further exacerbated by the use of a pressurized bentonite slurry mix being used to lubricate the TBM process. While the report references "frac-out" and steps to mitigate bentonite surfacing, what steps are planned to control bentonite "frac-in" where the bentonite slurry enters any of the aquifer formations and travels to the well head for the public supply well, or even a private well? The Potomac Aquifer is the County's sole water supply and the County is the State's largest municipal user of the aquifer. This needs significant more development in the DEIS as it is impacted by all alternatives.
 - N. Page 4.10-18: It is noted that the TMF construction at MD198, by adding up to 198 acres of impervious area, will impair the Little Patuxent River and its tributaries....how will this be mitigated?
 - O. Page 4.10-19: Same concerns regarding impacts to aquifer as noted on Page 4.10-10.
 - P. Page 4.18-8: The County has many buried ferrous metal piping traversing the SCMAGLEV alignment (see page 3-37 comment) that would be susceptible to corrosion from stray currents generated by the train; this impact is not covered in the report.
 - Q. Page 4.20-2: Table 4.20-1 shows WSSC and Baltimore City owned utilities that will be affected and does not include any Anne Arundel County facilities. The table references that the City of Baltimore provides the County with water; however it is noted that the County is self-reliant on water supply and distribution and mostly so for wastewater. The report does not develop this area of focus sufficiently and understates Anne Arundel County's vast array of buried water and sewer utilities.
- III. The Project has the potential to significantly impact transportation and mobility during and after its construction. The following specific comments and questions address the County's concerns regarding transportation impacts.

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- A. Page 4.1-6: Brock Bridge Road Bridge over the Patuxent is not weight restricted; however Brock Bridge Road is restricted to vehicles over 5T as thru traffic from MD198 south based on road geometry and residential property concerns. Utilizing Brock Bridge Road as a material haul route would be problematic and would need to be addressed.
- B. Page 3-38: Where/how would Old Portland Road be relocated and how many properties affected?
- C. Pages 3-3, 3-4: Report notes that tunnels would be on average 80 to 170 feet deep; this contradicts later in the report noting 340 feet deep.
- D. Page 3-8: Report excludes MD295 as a major N-S corridor that could be expanded under the "No Build" alternative.
- E. Construction of the entire SCMAGLEV Project would take approximately seven years. During this time, localized construction impacts, such as changes in traffic volume and circulation patterns, noise and vibration levels, and visual effects have the potential to occur. Construction includes trucking and disposal of an estimated 23+ million cubic yards of soil. Given that the length of the SCMAGLEV Project Study Area is roughly 40 linear miles, construction activities occurring in any one location will not last for the entire construction period.
- F. While it is clear that the proposed project may be able to provide faster travel from Baltimore to Washington DC, it does not really address the regional congestion experienced in the vicinity of the project in Anne Arundel County.
- G. The travel time analysis does not take into account travel time to/from the stations. While the maglev may be able to provide a 15-minute ride between the two cities, the increased driving or transit time will decrease the time savings. As an example - if a Penn Line MARC rider wishes to travel to the Camden Yards location, the google estimated travel time is approximately 20 minutes. If a Penn Line rider wishes to travel to the Cherry Hill location, the google estimate travel time is 30 minutes. These do not include transfer times, waiting times, etc. While the Camden Yards station would have a mix of walking, transit, and auto traffic, the Cherry Hill station does not currently support similar development within walking distance.
- H. The analysis of the Cherry Hill station location does not appear to adequately take into account the sufficiency of the local transportation network. The analysis uses the BMC regional model to state that 57,000 vehicle trips would be diverted; the local network would likely need more than the proposed minor intersection improvements to handle the additional vehicles. Assuming no drop-off or pick-up traffic is generated, the 5,000 vehicles using the parking garage would triple today's volume along Cherry Hill Road.
- I. The analysis does not take into account vehicles accessing the Cherry Hill site from the south via Hanover/Pottee Street bridges.
- J. The 2045 no-build scenarios indicate that the LOS projections at the sites near the airport are only slightly worse, while the LOS results for several intersections near the Cherry Hill site deteriorate significantly. It is unclear what would drive the significant increase in traffic in that area. Further discussion is warranted.

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- K. Significant roadway impacts are projected near BWI. Further coordination and planning with County and State agencies on required improvements are needed when the project reaches later stages.
 - L. Any impacts from the maintenance facilities on area roadways will need to be studied and potentially mitigated. The MD 198 NEPA study that obtained a signed FONSI in 2013 identified several failing facilities and have a proposed roadway plan that did not include the proposed SCMAGLEV facility.
- IV. The Project has the potential to impact solid waste management within Anne Arundel County and the region. The following, specific comments and questions relate to these impacts.
- A. Generally local government-owned landfills restrict disposal to materials originating within their particular county. Anne Arundel County does not accept materials originating from outside of the county.
 - B. The County's Millersville Landfill does not have a predicted operational soil need based on current development plans. This could change if new development plans are pursued and approved in the future.
 - C. The County charges the normal landfill fee to accept clean soils. This is currently \$75/ton.
 - D. Disposal of municipal solid waste must pass the EPA "paint filter liquids test" (Method 9095B) test to ensure compliance with 40 CFR.
 - E. A better use of clean soil would be for clean fill a) for the project, b) for nearby projects, or c) as some other beneficial use (vs. disposal).
 - F. Private sector rubble recycling (and disposal) facilities are available in the region and preferable to the use of municipal solid waste disposal facilities. In Anne Arundel County, zoning law requires rubble landfills to recycle 30% of what they accept.
- V. The following comments cover other areas of specific concern.
- A. The SCMAGLEV would increase net energy consumption (using the existing regional electricity pool), which could result in increased electricity prices and power outages during high-demand periods. The existing power transmission lines on the east side of the BWP for approximately 1.1 miles in the vicinity of MD 198 would be impacted with Build Alternatives J-01 thru J-06. However, the impact to the transmission lines and transformers due to potential power transmission congestion will not be fully known until a Transmission Feasibility Study is conducted.
 - B. Temporary adverse construction impacts to business revenues in the affected areas may be significant, ranging from \$18.5 million to \$311.3 million (2018 dollars).

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- C. The Woodlands Job Corporation located at 3300 Fort Meade Road (MD 198) in Anne Arundel County would be displaced by each Build Alternative with the MD 198 TMF. This community facility provides a residential career training program and job placement program for low-income individuals. The US Department of Labor (DOL) expressed opposition to any Build Alternatives that would remove the facility, as it is only one of two of the kind in the Washington, D.C., area, and relocating the center would be extremely costly.
 - D. Build Alternatives J-01 and J-04 would have the greatest permanent impacts on the following Federal properties: BWP, Fort George G. Meade, and the Patuxent Research Refuge (although this is nearly the same for all Build Alternatives J). Most of these impacts are related to the viaduct associated with Build Alternatives J. The Fort George G. Meade property is impacted by the viaduct, proposed deep tunnel portal, stormwater management, SCMAGLEV system facilities, and a new access road.
 - E. Adverse property impacts around the selected TMF would slightly reduce the tax base in Anne Arundel County and Prince George's County. Parcel acquisitions would also have a negative impact on the affected jurisdictions, reducing the entire tax base value less than 0.2 percent.
 - F. As proposed, the current maglev alignment and facilities will have significant impacts on Anne Arundel County, but the study does not show the transportation benefits of the project as it relates to providing the connections necessary to the existing transit options currently available and planned in the County.
 - G. When traveling on an elevated viaduct, staff is concerned the viaducts will be built too close to homes and communities. The report does not indicate what parameters will be put in place to temper the effects of noise and vibrations that may impact those areas.
- VI. The County acknowledges that the Project, as with all large-scale infrastructure projects, also has the potential to provide significant benefits. Such benefits must be carefully weighed against potential impacts to communities and the environment. The following are specific benefits highlighted by the County during its review.
- A. The SCMAGLEV Project could spur development and commercial investment in neighborhoods near station locations. This could improve the long-term character of neighborhoods' economic and demographic makeup due to increased property values, changes to commercial and retail offerings, increased employment opportunities, higher wages, and changes to available community facilities.
 - B. Around the selected stations, property values could increase; therefore, the tax base in Washington, D.C., and Baltimore City could increase.
 - C. Total construction employment impacts would range between 161,000 job-years and 195,000 job-years. The economic impacts in terms of earnings from the construction of the SCMAGLEV Project would be between \$8.8 billion and \$10.6 billion (2018 dollars).

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- D. The annual economic impacts from operation and maintenance would result in between 390 and 440 total jobs annually, and between \$24.3 and \$27.4 million in earnings (2018 dollars).
- E. The SCMAGLEV Project could reduce overall mobile source emissions regionally.
- F. The availability of the SCMAGLEV service option would change the travel patterns in the Combined Statistical Area (CSA). These changes include the net change in user benefits, increased reliability relative to other modes, increased safety, induced ridership, avoidance of congestion, pavement savings, and reduced emissions as drivers divert to SCMAGLEV.

Thank you for the opportunity to comment on the proposed SCMAGLEV Pproject's draft environmental impact statement. Anne Arundel County looks forward to working with the Maryland Transit Administration in future reviews of this and other large-scale infrastructure projects. Any specific questions regarding the County's comments should be forwarded to Lori Rhodes, Deputy Chief Administrative Officer for Land Use (exrhodes@aacounty.org).

Sincerely,



Steuart Pittman
County Executive

cc: Honorable Secretary of Transportation, Greg Slater
Honorable Chairwoman of the Anne Arundel County Council, Sarah Lacey

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