



May 24th, 2021

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SCMAGLEV Project c/o
Lauren Molesworth
Environmental Planning Manager at Maryland Transit Administration
Maryland Transit Administration
6 Saint Paul St, Baltimore, MD 21202
info@bwmaglev.info

Re: Comments on the Draft Environmental Impact Statement (DEIS), Draft Section 4(f) Evaluation, Draft Section 106 Programmatic Agreement, and Ridership Studies for the Baltimore-Washington SCMAGLEV Project

Dear Ms. Molesworth,

Maryland League of Conservation Voters (Maryland LCV) is intrigued by the idea of high-speed rail in Maryland and appreciates the opportunity to comment on the DEIS for the proposed SCMAGLEV project. As currently outlined in the DEIS, we have significant concerns with the project. These comments outline our concerns and our recommendations regarding the commitments Baltimore-Washington Rapid Rail, LLC (BWRR) need to make to address our concerns.

Maryland LCV is committed to a healthy environment for everyone in Maryland. We believe climate change is the most urgent environmental threat facing people and our planet. We fight to protect clean air and water and strive for equity and racial justice in everything we do. The general concept of a magnetic levitation train system presents intriguing opportunities towards our core mission and values. Maryland needs transit-oriented development and additional investment in public transportation systems that reduce demand for fossil fuel powered cars. We hope to see investments in transit projects that will reduce the demand for carbon intensive transportation. We also support projects that provide good paying, family supporting jobs for all Marylanders and strongly support union jobs in the public transportation industry.

Maryland LCV has three areas of significant concern regarding the SCMAGLEV Project based on the information presented in the DEIS and discussions with various stakeholders.

1) Energy consumption and carbon footprint: The DEIS states that this project could require 3 trillion BTUs of energy and this energy consumption does not

appear to be offset by the potential drop in traffic. If powered by the traditional fossil fuel intensive grid in Maryland, the greenhouse gas (GHG) emissions in this state will increase because of this project, even after accounting for the decreased car traffic. Unless the train is entirely powered by renewable sources such as wind and solar energy, the project has a significant carbon footprint. Maryland LCV strongly encourages BWRR to commit to reduce the fossil fuel energy consumption to net zero. Specifically, we encourage BWRR to commit to ensuring the energy to power all aspects of the project comes from Tier 1 renewable sources including wind and solar power. Additionally, if solar panels and wind turbines to supply the estimated 3 trillion BTUs of needed energy for the project need to be built, BWRR should avoid removing forests or other natural areas, and costs of the increased clean energy infrastructure should be paid by BWRR.

- 2) Impact on protected natural areas:** All the alternative routes presented in the DEIS go through the protected natural areas that make up the 'green wedge' of central Maryland. This is the largest remaining habitat hub in the region of which contiguous habitat is particularly important to forest interior dwelling species. All proposed alternatives have impacts on federally protected land and the sponsor preferred alternative impacts the federally protected research refuge, the nation's only national wildlife refuge established to support wildlife research. The proposed byway, 200-acre transit maintenance facility and other infrastructure create significant impervious surfaces that will create significant stormwater loads to impacted watersheds. All alternatives create significant impacts on forests, wetlands, and local waterways. According to the DEIS, conservation and mitigation requirements are according to state minimum standards which we find insufficient to mitigate the high ecological importance of these areas.

Maryland LCV strongly encourages BWRR to go beyond state minimums to address impacts on Maryland's lands and waters. Specifically, impact on natural land, especially federally protected natural land must be minimized to the maximum extent practicable, and this project must not remove land from the nation's only research refuge. Mature ecosystems provide far greater ecological stability than newly planted ones. Where impact to natural areas is unavoidable, BWRR must commit to ambitious restoration and permanently protect ratios to compensate for affected ecosystems. BWRR should commit to a reforestation ratio of five acres of afforestation and permanent protection provided to compensate for every one acre removed or significantly impacted (5:1), and at a wetland/floodplain mitigation ratio of 10 acres restored for every one acre that is significantly impacted (10:1). All other impacted ecosystems should be restored at a 2:1 ratio. Replanting and permanent protection must be in hubs and corridors of contiguous habitat as outlined in the Maryland state and/or local green infrastructure maps.

- 3) Equity concerns on local communities, communities of color, and potential environmental justice hotspots:** It is our assumption that the greatest benefits of the project as outlined in the DEIS are focused on the more wealthy and the areas outside the communities directly impacted by the project. While investment in underserved areas such as Cherry Hill could provide economic uplift to the area, there is also the danger of current residents being priced out of this area through gentrification. There is also concern that communities along the train route could be adversely

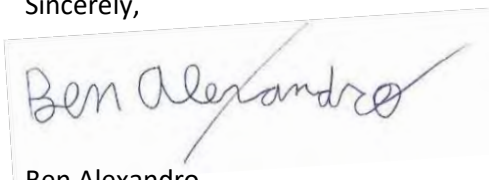
affected by direct and indirect impacts such as the high winds caused by the fresh air egress facilities and increased stormwater and air pollution from parking structures at train hubs.

Maryland LCV is deeply committed to not only avoiding impacts but lifting up underserved communities and strongly encourages BWRR to commit to doing everything they can to improve and support these communities. Specifically, we encourage BWRR to provide a fare assistance program for “blue collar” workers and moderate-to-low income households in the communities impacted by this project (e.g. Cherry Hill). Assistance programs must also be put in place to ensure that any impacts upon the local communities are fairly and equitably mitigated. For example, BWRR could create robust programs to protect affected communities to ensure they are not priced out of their neighborhood and forced to leave due to gentrification. Of most importance, however, is that BWRR commits to creating and implementing programs and solutions that are designed *by the communities*. Representatives of these communities need to play a formal and integral role in addressing the potential adverse impacts of the project. Finding, supporting, and engaging these representatives needs to be a top priority for BWRR.

Maryland needs to aggressively work to reduce GHG emissions. A high-speed rail system that is sourced from renewable energy could play an important role in meeting this goal. However, as presented in the DEIS Maryland LCV has significant concerns with this project. BWRR needs to commit to producing a net-zero GHG project, ensuring local impacted communities are engaged in determining how they can be strengthened by the project and that impacts to natural areas are avoided at all cost. If there are unavoidable impacts, the project should mitigate far more than the minimum requirements. BWRR has an opportunity to send a clear signal and be a leader by making the above commitments to Maryland’s land, water, climate, and people.

If you have questions or would like to discuss any of these comments, please do not hesitate to contact Ben Alexandro at balexandro@mdlcv.org or 845-596-9634.

Sincerely,

A handwritten signature in black ink that reads "Ben Alexandro". The signature is written in a cursive, flowing style with a long horizontal stroke extending from the end of the name.

Ben Alexandro
Water Program Director
Maryland League of Conservation Voters