

## **PUBLIC COMMENTS ON THE DRAFT SCMAGLEV ENVIRONMENTAL IMPACT STATEMENT AND SECTION 4(F) EVALUATION**

May 18<sup>th</sup>, 2021

To Whom It May Concern:

Please accept the following comments on the proposed SCMAGLEV Draft Environmental Impact Statement and Section 4(f) Evaluation. The comments include the text in this document, as well as a short PDF presentation of key points (appended at the end of this letter).

The Baltimore-Washington Transportation Research Group (BWTRG) - an academically-rigorous evaluation and planning organization focused specifically on the transportation options extant or proposed in the corridor between Baltimore and Washington (which is the focus of the this EIS and 4(f)) - finds the proposed project to be wholly inconsistent with the widely-accepted transportation needs of both the corridor of focus, as well as the wider region. While the project "Purpose and Need" (as listed on page ES-6, and discussed throughout the document) echo our beliefs about where transportation dollars should be directed towards, it is our firm conviction that this service is the exact wrong way to go about achieving those objectives.

SCMAGLEV would represent a major misallocation of scarce transportation dollars, a huge step backwards in the relationship between mass transportation and the environment, and in our determination, the inauguration of an immediate and potentially gargantuan, never-ending vacuum of public transportation funds. It is for these reasons, discussed in more detail below, that we urge the rejection of any funding consideration for this project, and instead push for the immediate funding of what we have determined to be **the "Preferred Option" for fast train service in the Baltimore-Washington corridor: Express MARC Service.**

A number of other organizations have pointed out key environmental arguments against SCMAGLEV, including: (1) the placement of the route through, and in, environmentally-sensitive land parcels; (2) the exorbitant amount of electricity necessary to run the service; (3) the unfavorable greenhouse gas emission estimates; and (4) the safety concerns of running trains that travel at such high speeds. While we echo and support those comments and concerns, we will instead focus our comments on two other critical and central concerns of the project, ones that are both environmental and fiscal in nature, namely: (1) Who is going to ride this service? And (2) What is the cheaper, less disruptive and more sensible way to achieve the key stated objectives of the project?

The central "Purpose and Need" argument against SCMAGLEV is that **we already have a service in place capable of achieving the stated objectives**, yet this comparable service - infinitely cheaper, requiring no new construction, and utilizing existing rolling stock - remains unrealized and unfunded largely for reasons of lack of vision, lack of understanding of capabilities, and systemic racism.

To wit, we have determined that the Maryland Area Regional Commuter Train Service (MARC) of the Maryland Mass Transit Administration (MTA) could run a full express service (1 train each way per hour, Baltimore to Washington, 6am-8pm every workday) on existing tracks with existing equipment, tomorrow, if it chose to do so. We have further determined that such service could be additive to existing service, and that holes in the schedules of both Amtrak and MARC exist to be able to run this

once-an-hour service on the Penn Line, as well as in the schedules and capabilities of the B&P Tunnel. We have determined that such a trip would take 29 minutes (less than one-half hour!) between Baltimore and Washington, were it to include just the recommended stations of Baltimore Penn Station, West Baltimore MARC Station, BWI Rail Station and Washington's Union Station. And lastly, and importantly, the one-way trip would be estimated to cost between \$8-10.

**To repeat, MARC could run an additive service on the Penn Line with existing equipment on existing tracks tomorrow, if it chose to, and the trip time between Baltimore and Washington would be under a half hour. No new construction needed, and with a ticket price of less than \$10.**

Contrast that with the MAGLEV proposal for the essentially the same stops: Washington, BWI and Baltimore. What is cataloged in the EIS and other evaluations represents what would be massive environmental and social disruption, costs requiring more than \$10 billion in taxpayer funds, tremendous on-going operating subsidies necessitated, and a one-way ticket price estimated to be up to \$60. Put simply, who is going to buy a \$60 one-way ticket from Washington to Baltimore, when they can do the same trip on MARC express for as little as \$8, with it only taking 14 minutes longer? The answer: no one. The evaluation of this project could almost stop right there.

But there are other key contradictions between this proposal and its described benefits that should be pointed out. The stated objectives of the SCMAGLEV Project are listed on page ES-6 of the study. The first two objectives listed are:

- Improve redundancy and mobility options for transportation between the metropolitan areas of Baltimore and Washington, D.C.
- Provide connectivity to existing transportation modes in the region (e.g., heavy rail, light rail, bus, air).

Responding to the first item, again, the question is, who is going to buy that \$60 ticket for this service when \$8 tickets are available that take only 14 minutes longer, and drop the passenger in a more central location? If the answer is that very few, if any, folks are going to take that \$60 trip, then this first stated objective will not be realized. Ticket costs must be a factor of consideration for this project, and on that consideration, this MAGLEV proposal fails miserably.

Moreover, further on the subject of costs, Baltimore is not a city of relatively wealthy households. Rather it is a majority African-American city that still suffers from the on-going vestiges of redlining and racism in housing. The accumulation of generational wealth through owned housing has been inhibited for widely-recognized mechanisms in Baltimore, and therefore, for that reason among others, there are significantly fewer African-American residents of Baltimore that are even capable of regularly paying \$60, or even \$30, for one-way tickets to Washington. **So to the extent that "equity" has become a key buzzword and objective in transportation planning, this project would seem to fail on that level as well.**

Finally, regarding that second stated objective of SCMAGLEV - it's connectivity benefits - again, this doesn't seem to pass the smell test. In Washington, the greatest center of connectivity, the multi-modal hub of our nation's capital, Union Station, is not where this train would end up. It would instead end up in Mt. Vernon Square, at a marginal stop on just one subway line, into which it might not even be directly connected, thereby requiring a walk out to the street to then connect into the DC Metro system. In short, connective, it is not.

And the same should be said for its two proposed Baltimore locations, one (Cherry Hill) that is nowhere near the downtown, nor near any other existing multi-modal hubs. MARC express service would therefore ultimately be a faster route to downtown Baltimore through public transportation - particularly if the Red Line Light Rail (or Subway) proposal were to be revived, for this line would directly tie into the planned future West Baltimore MARC station (again, only 29 minutes from Union Station). And the other proposed MAGLEV station, the downtown location, would require on-going massive disruption to parts of the Central Business District to implement - and again, it would not be multi-modally connective. So, as a general notion with this MAGLEV proposal, where is the connectivity? We as a transportation research organization focused on this particular corridor are unable to locate any.

For a deeper discussion of MARC express service and its potentially transformational economic effects in West Baltimore, Northern Anne Arundel County and beyond, please see our 90-page, fully-sourced Roadmap Report here: <https://westbaltimoreproject.org/report>

And for a presentation of these key arguments (and others), again, please see the appended slides.

Thank you for your consideration.

*The Baltimore-Washington Transportation Research Group*

# **MAGLEV vs MARC EXPRESS**

## ***The Preferred Alternative***

Baltimore–Washington Transportation Research Group's

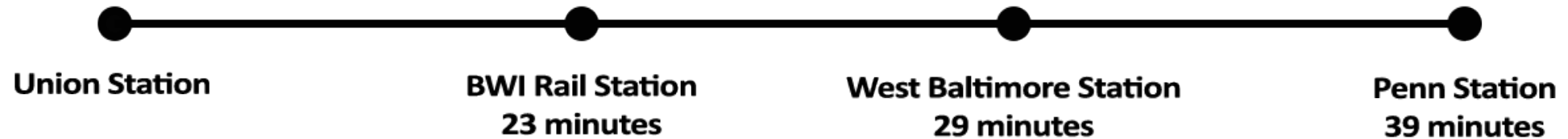


**West Baltimore Project**

**[WestBaltimoreProject.org](http://WestBaltimoreProject.org)**



# The Alternative: MARC Express Service



# The Alternative: MARC Express Service



**Existing Equipment**  
(that MARC already owns)



**Existing Tracks**

# MAGLEV

# MARC EXPRESS

*Construction*

**\$14 - 16 Billion**

**\$0**

*Baltimore-Washington  
Travel Time*

**15 Minutes**

**29 Minutes**

*Ticket Price*

**\$26-60**

**\$8**

**“Who is buying a \$60 one-way ticket to Washington?”**

**...Certainly not anyone in Baltimore.**

# Yet, the stated objectives of MAGLEV are:

(from the draft EIS)

The objectives of the SCMAGLEV Project are to:

- Improve redundancy and mobility options for transportation between the metropolitan areas of Baltimore and Washington, D.C.
- Provide connectivity to existing transportation modes in the region (e.g., heavy rail, light rail, bus, air).
- Provide a complementary alternative to future rail expansion opportunities on adjacent corridors.
- Support local and regional economic growth.

# Connectivity... Huh?:

## Proposed Stations

## Direct Connection to Metro?

**Mt. Vernon Square (DC)**

**NO**

**Cherry Hill (Balt)**

**NO**

**Inner Harbor (Balt)**

**NO**

**“Meanwhile, what will (or could) a  
MARC express system look like in  
20 years?”**

# MARC Express Line: Next 20 Years

Union Station



Burnham Place –  
\$8 Billion Project  
Finalizing EIS

BWI Rail Station  
23 minutes



BWI Rail Station TOD Potential –  
Northern VA-Like Possibilities,  
Given Faster Travel Times to DC  
Than The Arlington Corridor

West Baltimore Station  
29 minutes



New W. Balt. MARC Station –  
\$20 Million Station Yields Up To  
\$½ Billion Positive Impact Per Year  
on State and City Budgets

Penn Station  
39 minutes



New Baltimore Penn Station –  
\$500 Million Project  
Groundbreaking This Spring



# Union Station – Next 10-20 Years



- Burnham Place
- New Neighborhood Constructed on Top of the Rail Yard
- 1.5 Million Sq Ft of Office Space
- 100,000 Sq Ft of Retail
- 1,300 Residential Units
- 500 Hotel Rooms
- Fully Redesigned Union Station
- 29 Mins from Baltimore by MARC Express



# Penn Station – Next 5-10 Years



- Fully Rebuilt Main Station
- Entirely New Acela Station
- \$500 million investment
- TOD Offices and Apartments
- Revitalized “Opportunity Zone”
- Construction Begins Spring 2021



# BWI Rail Station – Next 10-20 Years?



- **23 Minutes to Union Station on MARC Express**
- **\$7 Tickets (Less As Monthly Pass)**
- **Travel Times to Downtown DC are Faster than NoVA's Arlington Corridor (Left)**
- **Endless TOD Potential**
- **BWI Could be Capitol Hill's Most Accessible Airport**
- **Potentially Transformational for Anne Arundel County**



# WEST BALTIMORE MARC STATION - "Gateway District" Vision Document

February 2021



**WEST BALTIMORE MARC STATION** (track perspective)  
- conceptual rendering of new marquis, multi-modal station replacement station planned for track realignment  
- would be ~ 60,000 sq. ft. with track access on second level



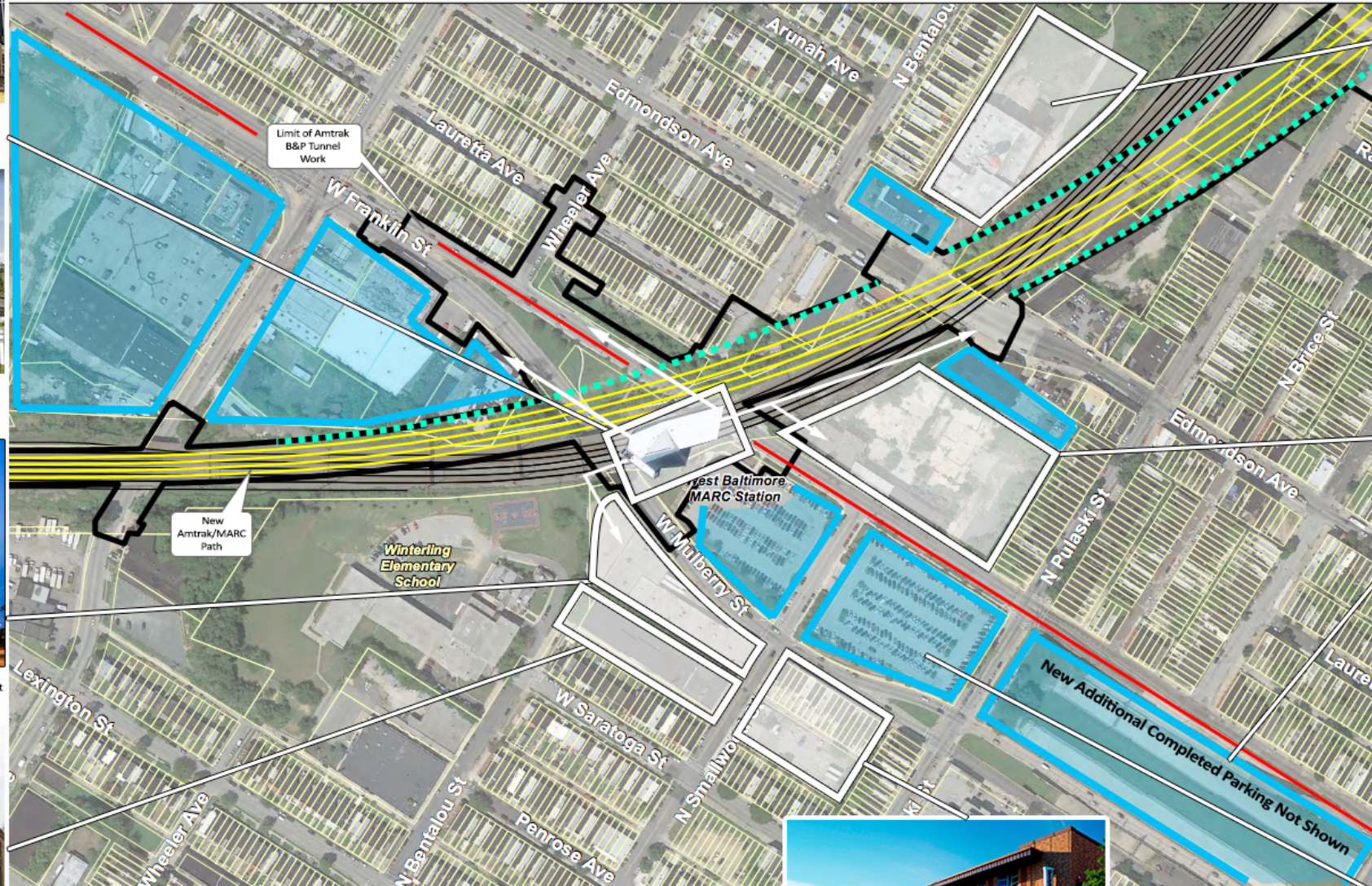
**WEST BALTIMORE MARC STATION** (front perspective)  
- building only cost estimate: \$17 million  
- \$94 million currently budgeted for station and track  
- presumed funding with B&P tunnel replacement



**THE MARSHALL**  
- conceptual rendering of massive TOD condo/retail development  
- 60,000 sq. ft. pad available directly adjacent to station  
- connected to station by pedestrian walkway over Mulberry St.



**THE MENCKEN**  
- conceptual rendering of mid-rise TOD condo/retail development



- Key Focus Parcels**
- Additional Parcels Potentially Available for Transit-Oriented Development**
- Planned Baltimore Metro Red Line (Subway Preferred)**
- Amtrak Sound Wall (To Be Constructed As Part Of B&P Tunnel Project)**
- Walkways from Station**



**SIMON STUDIOS**  
- conceptual location for television and film soundstages  
- iconic Ward Bakery building and large industrial lot available



**AMERICAN ICE FACTORY**  
- walkway on bridge across Franklin St. directly to venue  
- walkway will also continue to Edmondson Ave.  
- historic tax credits awarded



**PARKWAY CORSO**  
- conceptual reference for TOD parking lots  
- mixed-use with promenade connecting station with new park



**GATEWAY CENTER**  
- conceptual reference for TOD parcel on station parking lots  
- condominiums on top, commercial/retail underneath



**GROCERY STORE**  
- conceptual location for large-lot grocery store  
- Mulberry St. frontage  
- quieter neighborhood side and rear  
- rear parking



# W. Balt. MARC Station – Next 5-10 Years?



Conceptual Reference for a Modern, Multi-Modal Station

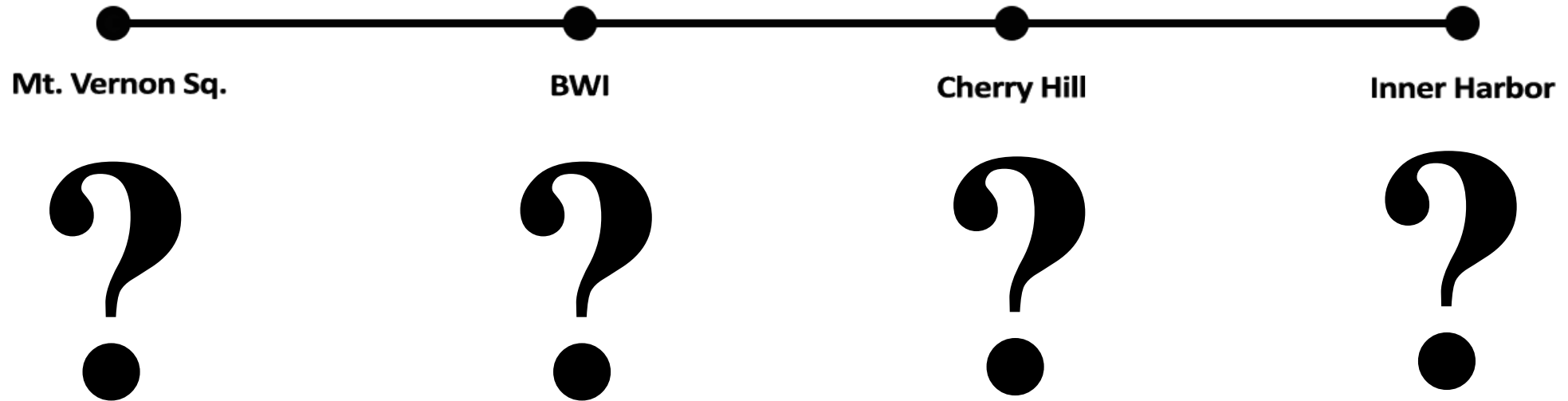
- Station Developed as Part of B&P Tunnel Construction
- B&P is Top Amtrak Priority; Likely Funded This Year
- State of MD Has Budgeted \$94 Million for Work
- Station Would Cost Roughly \$20 Million

- New Marquis Multi-Modal Modern Showcase
- Landmark Centerpiece for the Neighborhood and Commuters
- An Equally Welcoming Beacon at Night
- Red Line Subway Would Directly Tie In



Conceptual Reference for a Modern, Multi-Modal Station

# MAGLEV: Next 20 Years?



- How does it connect to Metro?
- Where is parking?
- “Character of Mt Vernon Square will be permanently changed.... Substantial construction and long-term operational implications on nearby properties” – *Head of DC Dept of Planning*

- Where’s the station going to end up?
- How many properties and environmental sites will be impacted?
- Who is going to pay \$40 for an airport ticket, when MARC express gets you there 10 minutes later and \$33 cheaper?

- Having a station here defeats the whole purpose - and competitive advantage - of inter-city public transportation – to go from downtown to downtown.
- How many properties and environmental sites will be impacted?

- If the station is here, Baltimore may not even be included in the DC-NY 1-hr trip. Instead it will be some sort of “local” train.
- Historic Fallon Building federal courthouse likely to be demolished – for a parking lot.

# What about equity?

**How can our Federal Government give \$10 Billion in subsidies to a consortium for a train that only the rich can afford, while economically-challenged West Baltimore can't even get a pilot MARC express service to Washington from their station - even though that service would cost next-to-nothing and bring the potential for transformational revitalization and hundreds of millions per year in added income and savings to city and state coffers?**

# What's a Better Way to Use \$10 billion?

**Fund Two Additional Subway Lines in Baltimore**

(to finally make an actual system)

**Pay Down 75% of MTA's State of Good Repair Needs**

(MTA needs >\$13 billion through 2045)

**Fund "BWI Platform & 4<sup>th</sup> Track Project" AND 9 Similar Ones**

(creating huge capacity increases on NEC and Penn Line,  
and cutting DC-NY Acela travel times significantly)



# MAGLEV is Maryland's Monorailfail

