May 24, 2021

SCMAGLEV Project c/o Lauren Molesworth
Maryland Transit Administration
6 Saint Paul St, Baltimore, MD 21202

Via email to info@bwmaglev.info

We, the undersigned organizations, are writing to express our opposition to the proposed Baltimore-Washington Maglev project and urge the Federal Railway Administration (FRA) to adopt the No-Build Alternative. The Maglev project would have numerous environmental impacts along its 40-mile route and within the surrounding area, both temporary impacts during construction and permanent impacts that cannot be mitigated. In many locations, the resulting destruction of critical habitat would be irreversible and would have substantial impacts on wildlife, public welfare, human health, and human recreational resources.

Clean Air and Climate Change

Project developers have publicly claimed that the Maglev is an environmentally-responsible project that will result in cleaner air through the removal of passenger vehicles from the roadways. This claim is not substantiated by the DEIS, which demonstrates that the project would increase annual net transportation energy consumption by up to 39% by the year 2045 compared to the No-Build option (Table 4.19-7). This is an increase in 3.07 Trillion BTUs, enough energy to power 88,900 homes (Page 4.19-11).

The DEIS further states that the Maglev would be “37 and 20 percent less efficient than existing bus and passenger rail, respectively” (Page 4.19-10). Thus, the Maglev cannot be touted as an energy efficient means of mass transportation. An analysis by Dr. Owen Kelley, a private citizen with a background in atmospheric sciences, found that the Maglev operation would increase net CO2 emissions by up to 336 million kilograms per year relative to the No-Build option (Greenbelt Online, greenbeltonline.org, April 13, 2021).

At the same time that the operation of the Maglev would result in increased greenhouse gases, the removal of vegetation to accommodate the Maglev infrastructure would result in a loss of ecosystem services and a concomitant lessened ability to remove carbon and carbon dioxide, as well as other pollutants, from the environment. The more than 9 million people who live in the Baltimore-Washington region depend on the ecosystem services performed by the existing green spaces for clean, breathable air. The late Senator Paul Sarbanes recognized this fact when he referred to the Patuxent Research Refuge as the “lungs of the Baltimore-Washington Region.” With the increase in greenhouse gases, people who live in the area would bear the burden of an increased risk of respiratory diseases associated with air pollution.

The increase in power consumption caused by the Maglev operations and the destruction of carbon-storing forests are in direct opposition to the urgent need for actions to reduce greenhouse gas production in order to abate ongoing climate change. A new report from the EPA, released on May 12, 2021, indicates that the climate change crisis is more dire than previously thought, and the inescapable conclusion is that we cannot allow such a massive scale infrastructure project that move us further from bringing climate change under control.
Public Lands and Green Space

The Maglev project would permanently impact up to 328 acres of federal property, including portions of the Beltsville Agricultural Research Center, owned by USDA; the Baltimore-Washington Parkway, owned by the National Park Service; the Patuxent Research Refuge, owned by the U.S. Fish and Wildlife Service as part of the National Wildlife Refuge System; the NASA Goddard Space Flight Center; Fort Meade, owned by the US Army; and other properties administered by the National Security Agency and the U.S. Secret Service. The project would destroy up to 451 acres of forests, including up to 42 acres of the Greenbelt Forest Preserve, owned by the City of Greenbelt. Local parks such as Maryland City Park and Springfield Road Park would also be taken to accommodate the SC Maglev infrastructure. In total, up to 140.5 acres of recreational facilities and parklands would be impacted.

The destruction of forests, wetlands, and other habitats would result in extensive impacts to the 20,000+ acre green oasis that is the largest tract of undeveloped land in the Baltimore-Washington corridor. The impacts would include not only the direct loss of habitat, but also disruption of ongoing research and human recreational use of the area.

The natural lands lost to Maglev infrastructure cannot be mitigated through re-creation elsewhere, as they are dependent upon specific geological formations and soil types. The lands at Beltsville Agricultural Research Center and Patuxent Research Refuge have been documented as some of the most biologically diverse and well-studied landscapes in the world. The destruction of habitat on these properties will impact the continuity of over a century of environmental research at the Patuxent Research Refuge and the Beltsville Agricultural Research Center.

There will also be significant impacts to outdoor recreational facilities, with the loss of public park space at Maryland City Park, Springfield Road Park, Greenbelt Forest Preserve, and Greenbelt’s Northway Fields Park, among others along the proposed route.

Recreational use of the Patuxent Research Refuge will also be impacted. The Refuge serves over 215,000 visitors annually, on average, including hikers, runners, dog-walkers, hunters, naturalists such as birders, and families. As part of the U.S. Fish and Wildlife Service’s Urban Refuge Program, the Refuge serves a diverse population and sponsors programs that bring inner-city youths and their families to the Refuge, perhaps for their first-ever experience in a natural setting. Maglev infrastructure would impinge on the Refuge’s public hunting areas, public hiking trail system, and at least one fishing pond. The proposed Train Maintenance Facility, with its round-the-clock operations, will bring a heavy-industry environment of noise and light pollution. The proposed viaduct would be tall enough to tower above the tree canopy and would be visible from the Refuge’s National Wildlife Visitor Center. The viaduct, which would flank the Baltimore-Washington Parkway for several miles, would forever negate the ability of the Parkway to fulfill its purpose of serving as a scenic entryway to the nation’s capital. Park service staff have called the impacts to the Parkway more substantial than anything they have seen in their entire career.

Rare, Threatened and Endangered Species

The construction of the Maglev infrastructure would result in loss of or damage to sensitive habitats and plant communities that harbor rare, threatened and endangered flora and fauna. Many of the habitats that would be impacted along the Maglev alignment and its associated infrastructure support plant communities that are rare within the State of Maryland, and that depend for their existence on the underlying geological structures and soil substrates. These communities are irreplaceable and cannot be recreated elsewhere.
In destroying sensitive habitats, the Maglev project would imperil specific Rare, Threatened and Endangered Species, as identified by the U.S. Fish and Wildlife Service (USFWS) and the State of Maryland, including nine species of mammals; twelve species of birds; two species of reptiles; three species of fish; eleven species of odonates (dragonflies & damselflies); eighteen species of lepidoptera (butterflies, skippers, moths); two species of freshwater mussels (one federally endangered); and at least seven species of plants (DEIS Chapter 4, Section 4.12.3.3 and DEIS Appendix D.7, Attachments A, B, C and F). Although the DEIS states that the Project Sponsor will mitigate impacts to rare, threatened and endangered species, the DEIS fails to provide detailed mitigation plans.

There is no analysis of Rare, Threatened and Endangered species at the Greenbelt Forest Preserve, Maryland City Park, Springfield Road Park, Fort Meade, or Goddard Space Flight Center, or in outlying areas that will be impacted by the Maglev, such as Konterra, the site of a proposed large Lay-Down Area. There is also no evaluation for impacts along the tunneled portion of the proposed route. In other words, the project sponsor is seeking to move forward with the project before conducting a full analysis of Rare, Threatened and Endangered Species within the entire project impact area. This is an unacceptable oversight.

Waterways and the Chesapeake Bay

The Maglev would have negative impacts on eight sub-watersheds of the Chesapeake Bay Watershed: the Anacostia River, the Upper Patuxent River, the Little Patuxent River, the Severn River, the Lower North Branch of the Patapsco River, Baltimore Harbor, Gwynns Falls, and Jones Falls. The DEIS does not demonstrate that the tunneling process will adequately protect underground aquifers and wetlands from potential disruption and damage.

Of special watershed concern is the proposed Trainset Maintenance Facility (TMF), which would add approximately 200 acres of new impervious surface to the region. The DEIS states that the placement of the TMF in either the Anacostia or the Little Patuxent Watershed would cause “a change in watershed function” such as the “ability to filter and store water in the soil” (Page 4.10-15). In total, up to 76 acres of floodplain, 51 acres of wetlands, 124 acres of Chesapeake Bay Critical Area, and 12,896 linear feet of waterways would all be negatively impacted (Table ES4.3-1).

The cumulative effect of the changes to the waterways, wetlands, and sub-watersheds in terms of stormwater management, increased runoff, and potential chemical pollutants would impair the ability of the State of Maryland to meet the mandates of the Chesapeake Bay Watershed Agreement.

Environmental Justice

There are significant environmental justice concerns surrounding the Baltimore-Washington Maglev project. Minority populations comprise 69.6% and low-income populations make up 12.7% of the total population in the Maglev Project Affected Environment. There will be both permanent or long-term impacts as well as shorter term impacts to communities of color and low-income populations. Low-income populations and Black and Latinx minorities are at a higher risk of direct and disproportionate impacts of the construction of this project. The construction staging and laydown areas and haul routes would predominately occur within environmental justice population areas. According to the DEIS, 80% of the parcels that would be impacted by land use conversion, rezoning, and property acquisitions are in communities of color. Furthermore, 100% of the above ground viaduct portion of the Maglev, where
construction and perpetual community impacts would be the greatest, are within or directly adjacent to environmental justice communities.

Worse yet, these communities would not directly benefit from the Maglev. The proposed project has three stations; one in Mount Vernon East Washington D.C., a stop at the BWI Airport, and finally a terminus station in Baltimore at either Camden Yards or Cherry Hill. The communities of Prince George’s and Anne Arundel Counties would feel the brunt of construction and long-term impacts, while receiving no public transportation benefits in return. The extremely high ticket price, projected to be an average of $60 for a one-way trip, would exclude all but the wealthiest of commuters from riding on Maglev. This is eight times higher than a corresponding ticket on the MARC train.

Conclusion

For these reasons, we are opposed to the construction of the Baltimore-Washington Maglev, and request that the No-Build alternative be adopted. We call on Congress, the FRA, and MTA to continue to invest in Amtrak and other regional transit options that better serve our communities while safeguarding our parks and the environment.

Signed,

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*Not included on letter submitted to FRA on 5/24/21 due to timing issues.*