



Danielle Spendiff -MDE- &lt;danielle.spendiff1@maryland.gov&gt;

## Comments on the BWRR SCMaglev Project's Water Quality Certification Application

1 message

Susan McCutchen &lt;[REDACTED]&gt;

Wed, Nov 15, 2023 at 12:42 AM

Reply-To: Susan McCutchen &lt;[REDACTED]&gt;

To: Danielle Spendiff -MDE- &lt;danielle.spendiff1@maryland.gov&gt;

**Dear Ms. Spendiff,**

I live in Bladensburg, the largest municipality of the Port Towns, which also includes Colmar Manor, Cottage City, and Edmonston. The historic Battle of Bladensburg is represented by a major monument commemorating the War of 1812, as well as is the nationally known World War I Peace Cross memorial, both located in our war Memorial Park. Both Peace Cross and our historic Bostwick House are on the National Register. We are also home to the Bladensburg Waterfront Park and concerned with water quality and construction issues.

I request that the MDE deny water quality certification to BWRR because of the harm it will cause to our community. A few key reasons are explicated below.

### **Greater Good?**

The BWRR documentation must prove that the SCMaglev would be built for the greater good despite the harm that will be caused to the waterways. The MDE must make an informed decision to grant the requested WQC. The answer should be "no," based on the extreme paucity of detail and lack of supportive data.

Bladensburg, an historic port on the Anacostia Watershed, is located in an environmental justice (EJ) community struggling to rebrand and uplift itself. It is in great danger from the proposed SCMaglev project for a number of reasons, including those associated with it being dug under and the associated major construction impacts. As the MDE is aware, increase in runoff, stormwater, and flooding issues would disproportionately affect the EJ communities, through which most of the SCMaglev project would wend its way.

### **Lack of Planning Detail and Missing Documentation - and Transparency**

Throughout its application, BWRR says they "intend to meet the requirements" or "opportunities have not been fully analyzed and quantified to date" or they intend to maintain the condition of waters within the affected watersheds by avoiding and minimizing impacts and providing mitigation for impacts that cannot be avoided. BWRR did not provide the required documents and detailed plans in their application.

BWRR either lacks the ability to or has attempted to intentionally put off providing the detailed planning information until after a WQC decision has been reached. While that has been addressed with the MDE telling BWRR they must submit the required documentation by the end of the extended public comment period, the MDE still has a critical decision to make regarding such a very large and impactful project. That the MDE had to prompt BWRR for their "best management practices" indicates at the least a lack of preparation and at the worst an irresponsible approach to justification for their project and its effect in communities along the path.

### **Beaverdam Creek I & II and Patuxent River I**

Beaverdam Creek I & II and Patuxent River I are high-quality Tier II waters. "Tier II waters exceed the quality necessary to support the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water" (the definition of Tier II waters). The impacts to Beaverdam Creek with construction and the obvious toxic runoff from the train maintenance facility will seriously degrade Beaverdam Creek's (both Beaverdam 1 &2) health.

The lack of specificity around stormwater management plans tells us that the project planners lack the ability to plan and analyze sufficiently enough to manage stormwater effectively and protect our waterways; in this case Beaverdam Creek. While the responsibility of the State of Maryland is to assist the applicant through this process, it is also to certify that this project will not harm our state's waterways. In this instance, the state should not certify the SCMaglev as the project will not only harm our waterways, it will not provide benefits that outweigh that harm.

**Deny BWRR SCMaglev Project Water Quality Certification**

I reiterate my request that the MDE deny water quality certification to BWRR for its severely deficient and ill-conceived SCMaglev project that has not yet even proposed a final route for a supplemental or final environmental impact statement review. How can certification go forward in such a fraught situation?

Thank you for your kind consideration of my comments.

---

***Susan R. McCutchen***

