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

1 message

Heather Ettus <[REDACTED]>  
To: "danielle.spendiff1@maryland.gov" <danielle.spendiff1@maryland.gov>

Sun, Nov 12, 2023 at 8:14 PM

Dear Ms. Spendiff,

I understand that BWRR has submitted its application to the Maryland Department of the Environment (MDE) asking for a Water Quality Certification (WQC) approval for a Tier II antidegradation water quality permit.

**I am writing to state my position that the MDE should not certify this project because it will harm our waterways.**

**I also wish to state that I appreciate the pressure the BWRR is imposing on you and the federal government. They are asking you to make a decision that will be tremendously harmful to our environment. The BWRR can only downplay and distort the issues because there is not a legitimate reason to go forward with the SCMAGLEV.**

### **1. Purpose and Need: Social and Economic Justification**

BWRR statement of purpose: "The purpose of the SCMAGLEV Project is to evaluate, and ultimately construct and operate, a safe, revenue producing, high-speed ground transportation system that achieves the optimum operating speed of the SCMAGLEV technology to significantly reduce travel time in order to meet the capacity and ridership needs of the Baltimore-Washington region."

The purpose and need statement by BWRR is so tightly defined to make one believe that only the Superconducting Magnetic Levitation (SCMaglev) train project can achieve the goal of an ultra-high-speed land-based transportation link between Baltimore and Washington, D.C. **The real need is for a fast, reliable, and low-cost link between Baltimore and Washington, D.C. And there are two alternatives to the SCMaglev that exist and are operating—Amtrak and the MARC.**

### **2. BWRR Public Benefits Claim**

BWRR claims: "Reduced emissions, which foster better air quality for the health and safety of Tier II residents."

[RESPONSE] The Maryland Coalition for Responsible Transit's Draft Environmental Impact Statement comments and research by Dr. Owen Kelley (National Aeronautics and Space Administration) have disproven this: "Project developers claim that Maglev would benefit clean air and climate change due to the number of cars it would remove from the road. However, the draft environmental impact statement shows that Maglev would actually increase regional transportation energy consumption by 39% — enough energy to power 88,900 homes. While Maglev is 25% more efficient than auto travel, it is 37% percent less efficient than existing bus service and 20% less efficient than existing passenger rail. In total, Maglev operation would increase net carbon dioxide emissions from 286 to 336 million kilograms per year compared to maintaining existing options."

### **3. Safety**

Current Superconducting Magnetic Levitation train design will present safety problems, including the potential for accidents due to the lack of detailed and appropriate safety regulations and standards for this technology. It is commercially unproven technology for which the United States has no safety standards. Not having the safety regulations worked out prior to construction design increases the likelihood of changes in construction design that would have deeper impacts on the environment than what is represented in the current application material.

#### **4. Financial Stability Depends on Ridership**

To date, Baltimore-Washington Rapid Rail (BWRR) and the Northeast Maglev (TNEM) have not provided any analyses or unredacted data to validate that the Superconducting Magnetic Levitation (SCMaglev) project is financially feasible. They have not substantiated their claims that the SCMaglev is able to generate sufficient revenue to be self-sustainable and to cover the costs of the system's operation, maintenance, and loan servicing. In BWRR's Water Quality Certification application documents, it is clear that the financial success of operating and maintaining the SCMaglev is based on ridership. However, we have not seen any ridership analyses, modeling, assumptions use, data, and findings that support their statements.

#### **5. Impacts on Communities**

The list of negative impacts on the specific communities along the Superconducting Magnetic Levitation (SCMaglev) train alignments is extensive. Especially vulnerable are Black and Brown or environmental justice communities. The Maryland Coalition for Responsible Transit's (MCRT's) questions and concerns were outlined in great detail in its comments to the 2021 Draft Environmental Impact Statement. No responses to the MCRT's comments or the many other comments submitted by other organizations and individuals have been received.

#### **6. Environmental Justice Community Impacts**

- Eighty percent of the parcels that would be impacted by land use conversion, rezoning, and potential property acquisitions are in environmental justice (EJ) communities.
- Nearly all the project ancillary facilities (those located above ground) are located within the EJ population areas (e.g., stations, viaducts, tunnel portals).
- Ongoing construction impacts would occur at varying locations, including in many EJ communities, for varying durations during the construction period, 24-hours a day, seven days a week, for one to seven years.
- A decreased level of service in EJ residential areas and changes to local access or mobility can be anticipated.
- The vehicle collisions and other operational accidents could be elevated in EJ communities throughout the SCMaglev construction period.
- Most of the frequent and severe noise and vibration impacts will occur in EJ communities.
- Air pollution will worsen around stations due to increased traffic and potentially harmful emissions from ventilation facilities.

#### **7. The Taking of Federal Land**

Making federally-owned land available to private companies sets a dangerous precedent. Other private corporations could build landfills. Mining companies could claim "public good" and destroy land owned by the Beltsville Agricultural Research Center, Patuxent Research Refuge, or National Aeronautics and Space Administration. They could create an unnecessary and inconveniently located industrial zone, as well as impact federally-owned land in other parts of the United States.

## **8. Lowered Water Quality**

The construction of the Superconducting Magnetic Levitation project in Tier II catchment areas will lower the water quality. Baltimore-Washington Rapid Rail is not able to mitigate the damage they intend to inflict. Environmentally, the area will never recover.

## **9. Invasive Species in a Native Environment**

Once areas for the train maintenance facility, access roads, guideways, laydown areas, and the other facilities are cleared from the existing, native environment, invasive species will move in. They will gradually move into the remaining, fragmented forest. This will effectively eliminate the habitats of many species and essentially destroy the Patuxent Research Refuge as it is today.

## **10. Retention of Original Biodiversity**

The region has retained much of its original biodiversity. For example, the Patuxent Research Refuge has retained all its breeding bird species except for two (i.e., Broad-winged Hawk and Bachman's Sparrow). Similar results likely exist for all the other groups of plants, fungi, insects, and vertebrates. The combined protected landscapes of several government agencies have created an integrated refuge for the region's plant, animal, fungi, and micro-organisms. The extensive and interconnected nature of these landscapes allows for these species to ebb and flow in space and time without becoming locally extinct due to small parcel sizes. Mitigation for losses of unique and globally rare forests that will be destroyed is to plant trees somewhere else, buy other land, pay into a land bank, and other non-mitigation mitigations for land that cannot be replaced or recreated elsewhere because of their unique characteristics (DEIS Chapter 4.3, Page 17)

## **11. Documented Plant and Animal Species**

The Beltsville Agricultural Research Center (BARC) has 901 plant species documented, while the Patuxent Research Refuge (PRR) has 282 species of birds, 217 species of bees, and 72 species of butterflies. Thousands of insect specimens have been collected from the combined properties of the BARC and PRR. The biodiversity of these combined research centers is more studied, more completely known, and of greater taxonomic importance than any national park or wildlife refuge in the nation. Reductions in their living space will equate to reductions in their numbers. Many of the species using the PRR are migratory. Disruption of the resting areas are destructive to their migratory patterns and ability to reproduce and thrive.

## **12. Loss of Green Space**

If built, the last and largest green space between Baltimore and Washington, D.C., will be weakened and partially disassembled. Green Corridor, the area that covers Greenbelt Park, the Greenbelt Forest Preserve, Beltsville Agricultural Research Center, and Patuxent Research Refuge is the largest span of contiguous forest land on the East Coast between Richmond, Virginia, and Boston, Massachusetts. Former senator Paul Sarbanes called this area the "lungs of Maryland."

## **13. Cooling, Carbon Storage, Air Filtering Loss**

If built, residents will lose the cooling, carbon storage, air pollution capture, calming, and spiritual aspects of this green area space. The impact area will be far beyond what the applicant claims. "Temporary" areas and access points will never be returned to their former capacities.

## **14. Cumulative impacts to the Beltsville Agricultural Research Center**

Cumulative impacts of the proposed Superconducting Magnetic Levitation train project and the Department of the Treasury's Bureau of Engraving and Printing's final plan for a Currency Production Facility on the Beltsville Agricultural Research Center will impact the same Tier II waters the Baltimore-Washington Rapid Rail application addresses. The combination of these two

projects' impacts on Tier II waters needs to be assessed and publicized, allowing the public sufficient time to comment.

Thank you,  
Heather Ettus

