



ADVISORY NEIGHBORHOOD COMMISSION 6E

PO Box 93020 Brentwood Station, Washington, DC 20090

Attn: Lauren Molesworth

Maryland Transit Administration
6 Saint Paul Street
Baltimore, MD 21202

Federal Railroad Administration
1200 New Jersey Avenue SE MS-20
Washington, DC 20590

May 20, 2021

Re: Baltimore-Washington Superconducting MAGLEV Project Draft Environmental Impact Statement

Dear Sir or Madam:

On May 18, 2021, at a special meeting of the Advisory Neighborhood Commission 6E (“ANC 6E” or “Commission”) and with a quorum of seven out of seven Commissioners and the public present, the above-mentioned item was addressed. After review of the materials included in the Draft Environmental Impact Statement (“DEIS”) for the Baltimore-Washington Superconducting MAGLEV Project (“MAGLEV Project” or “Project”), the ANC 6E voted (7-0-0) to provide the following comments on the Build Options included in the DEIS.

ANC 6E understands the benefit of intercity rail that is fast, convenient, affordable, and reliable to divert automobile traffic, reduce greenhouse gas emissions, and promote regional economic development along the Northeast Corridor. However, the current design is too focused on access by private automobile and does not do enough to mitigate negative impacts of the construction to the neighborhoods around the proposed Mount Vernon Square East station.

Summary of Comments:

- The design of the Mount Vernon Square East station should support a passenger mode share of at least 75% of passenger arrivals and departures by transit, walking, or bicycling.
- This mode share should be achieved through direct connection to Metrorail, integration with existing and planned bus and bicycle infrastructure, and a significant reduction in the volume of station parking.
- The Station Entrances at 1st Street NW and 4th Street NW should be reserved for emergency egress only and not used for general passenger boarding in order to mitigate traffic impacts on surrounding neighborhoods.
- The DEIS should propose further strategies to mitigate the economic, transportation, and quality of life impacts of the multi-year cut-and-cover construction on New York Avenue NW between 7th Street NW and North Capitol Street.

ANC 6E offers more details on the specific recommendations to mitigate the negative Project impacts in the Attachment.

Thank you for considering these comments from ANC 6E.

Respectfully submitted,

Rachelle Nigro

Rachelle Nigro
ANC 6E Chair

ATTACHMENT

Specific recommendations from ANC 6E to mitigate SCMAGLEV Mount Vernon Square East station impacts

MAGLEV Station Design Must Support a Mode Share of at Least 75% Passenger Arrivals and Departures by Transit, Walking, or Bicycling

The Build Scenario forecasts that 57% of MAGLEV riders would arrive or depart the station in an automobile, including 10% drive and park, 18% kiss and ride, and 29% taxi and rideshare.¹ The modal forecast anticipates over 19,000 additional daily vehicles arriving and departing the already congested street network around Mount Vernon Square to facilitate passenger pickup and dropoff. The Build Scenario is overfocused on automobiles for passenger arrivals/departures at the expense of transit (Metrorail, bus) and active transportation (walking, bicycles, scooters). Given the volume of passengers arriving and departing the station by automobile, the DEIS anticipates Several of the DEIS mitigation options, including optimizing traffic signals for automobile flow and adding additional roadway capacity,² further prioritize the movement of automobiles at the expense of all other forms of transportation.

The mode share for passenger arrivals/departures should be consistent with the mode share targets for commuting trips established in the District's Sustainable DC 2.0 Plan.³ Specifically, the Project must be designed to meet or exceed a transit mode share for passenger arrivals and departures of 50% by transit (Metrorail and bus) and 25% by active transportation (walking, bicycling, and scooting). Specific mitigation strategies to achieve this non-automobile mode share include:

- The DEIS finds that the Build Scenarios would have a significant negative impact on automobile level of service ("LOS") relative to the No-Build Scenario. Several intersections would be downgraded to a Level F (worst) rating for LOS, including New York Avenue and 10th Street NW, New York Avenue and 9th Street NW, L Street and 6th Street NW, New York Avenue and 6th Street NW, and Massachusetts Avenue and 6th Street NW, adding between 24.1 and 280 seconds of vehicle delay at each intersection. would have severe negative impacts on vehicle level of service ("LOS") within the Mount Vernon Station area.
 - The DEIS does not quantify the impacts of increased congestion on transit, bicycle, or pedestrian levels of service, which is a deficiency given the dense, multimodal neighborhood of Mount Vernon Square.
 - The DEIS fails to mitigate local air quality (NO_x, SO₂, PM_{2.5}), noise, and traffic safety impacts of increased automobile use due MAGLEV station access by the mode share

¹ Percentages reflect an average of the arrival percentage and departure percentage.

² DEIS at 4.2.10.5 Mitigation Strategies

³ Sustainable DC 2.0 Transportation Targets 1 and 2.

https://sustainable.dc.gov/sites/default/files/dc/sites/sustainable/page_content/attachments/sdc%202.0%20Edits%20V5_web_0.pdf

proposed. This is especially concerning, as the DEIS correctly identifies much of the area surrounding the proposed Mount Vernon Square East station as an Environmental Justice population area.

- MAGLEV Station must be directly connected to at least one Metrorail station to facilitate essential intramodal transfer. The Project team has shared conceptual renderings for a pedestrian tunnel connecting the MAGLEV station with the Mt Vernon Sq Metro Station. This tunnel and/or a tunnel to the Gallery Place-Chinatown Metrorail Station must be included as part of the final EIS.
- MAGLEV station must incorporate station access for passengers arriving and departing on bicycle, providing secure short- and long-term bike parking bikeshare docks, and opportunities for roll-in or carry-on bike service. Furthermore, the design of the station and supporting facilities must incorporate existing and proposed bicycle facilities included in the moveDC Plan Bicycle Priority Network⁴ map and address conflicts between passenger pick-up and drop-off zones and bicycle network plans.
- MAGLEV station must integrate bus facilities to support passenger arrival and departure by local bus (Metrobus and Circulator), mitigate any conflicts between passenger pick-up and drop-off zones, and integrate current and future bus priority networks identified in the moveDC Plan.⁵
- MAGLEV station design should significantly reduce the size of the curbside passenger pick-up and drop-off zones for taxi, transportation network companies (“TNCs”), and kiss-and-ride to reflect reduced ground transportation mode share and competing uses for curbside space, including bus only lanes and protected bike lanes in line with the District’s moveDC Plan.

DEIS Should Significantly Reduce the Amount of Parking Associated with the Project

The DEIS recommends building a 1,000 space parking garage under the station headhouse to accommodate a portion of the forecasted 3,360 daily park-and-ride passengers.⁶ ANC 6E finds the construction of a 1,000 space parking garage in the heart of Mount Vernon Triangle to be

⁴ The Bicycle Priority Network for the moveDC 2021 Update, which is currently under development by the District Department of Transportation (“DDOT”) identifies the following streets as part of the District’s Bicycle Priority Network with current or planned bicycle facilities: New York Avenue NW (between 7th Street NW and 5th Street NW), 7th Street NW, 6th Street NW, Massachusetts Avenue NW, 4th Street NW, New Jersey Avenue NW. Source: <https://movedc-dcgis.hub.arcgis.com/pages/mobility-priority-networks>.
K Street NW

⁵ The Bus Priority Network for the moveDC 2021 Update, which is currently under development by DDOT identifies the following streets as part of the District’s Bus Priority Network with current or planned bus prioritization facilities: New York Avenue NW, K Street NW, Massachusetts Avenue NW, New Jersey Avenue NW (between K Street NW and H Street NW). Source: <https://movedc-dcgis.hub.arcgis.com/pages/mobility-priority-networks>.

⁶ Table 4.2-8, Cherry Hill Station Alternative.

inconsistent with development trends for urban rail stations that do not provide customer parking⁷, and incompatible with the Sustainable DC 2.0 goals to reduce commuting mode share to 25% of trips by 2032.⁸ Amendments to the DC Comprehensive Plan, currently before the DC Council, recognizes that the addition of off-street parking has been shown to increase vehicle trips which adds strain to the transportation network and that asserts that “excessive off-street vehicle parking should be discouraged”.⁹

Consistent with the District of Columbia Office of Planning (“DCOP”) recommendations for the Union Station Redevelopment Plan,¹⁰ ANC 6E adopts the following recommendation to mitigate the adverse impacts of customer parking at the MAGLEV station:

- Significantly reduce the number of parking spaces at the Mount Vernon East Station by eliminating long-term parking and including only short-term parking to accommodate anticipated peak passenger load;¹¹
- Prioritize the remaining parking spaces as ADA accessible spaces;
- Adopt demand-based pricing for parking to reflect true cost of parking and further discourage park-and-ride in favor of transit and other non-parking modes for passenger arrival and departure.

Ancillary MAGLEV Station Entrances at New York Avenue and 4th Street NW and New York Avenue and 1st Street NW Should be Reserved for Emergency Egress Only

In addition to the main station entrance on New York Avenue between 7th Street and 6th Street NW, the DEIS also proposes two additional station entrances on New York Avenue at 4th Street NW and 1st Street NW. The DEIS does not specifically address passenger pick-up, drop-off, and parking adjacent to these station entrances. The neighborhoods surrounding the 4th Street and 1st Street stations are lower density and more residential than around Mount Vernon Triangle and are unlikely to be able to absorb the additional automobile volumes from passenger pick-up and drop-

⁷ District of Columbia Office of Planning and District Department of Transportation Report to National Capital Planning Commissioner Re: Appropriate Parking Numbers for the Washington Union Station Expansion Project (June 3, 2020)

https://planning.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/June%203%202020_OP-DDOT%20Report%20to%20NCPC_Appropriate%20Parking%20Numbers%20for%20the%20Washington%20Union%20Station%20Expansion%20Project%20%28With%20Attach.pdf

⁸ See footnote 3.

⁹ Comprehensive Plan Amendment Act of 2020, Policy T-1.1.8: Minimize Off-Street Parking:

An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged.

See also, Policy T-1.2.3: Discouraging Auto-Oriented Uses and Policy T-3.2.1: Parking Duration in Commercial Areas. Source: <https://lims.dccouncil.us/Legislation/B24-0001>.

¹⁰ DCOP Comments: LINK

¹¹ The DCOP recommends that the amount of short-term parking spaces be calculated as between 1% and 3% of peak hour passengers. Given ANC 6E’s understanding of peak hour passenger forecasts, ANC 6E believes that 50 spaces (minimum) to 150 spaces (maximum) are sufficient to satisfy the demand for short-term parking, especially if demand-based pricing is adopted for the parking.

off at these stations. Additionally, the station entrances near 4th Street and 1st Street are not near job centers or amenities that would warrant station entrances in these locations. For these reasons, ANC 6E recommends that the proposed station entrances at 4th Street and 1st Street be restricted to emergency egress only and not used for routine passenger entrance and exit.

MAGLEV Construction Impacts Are Not Sufficiently Mitigated

The construction method proposed for the station and track alignment -- via highly disruptive “cut-and-cover” that will disrupt traffic on New York Avenue NW for a period of four years or more. The DEIS must mitigate the short-term construction impacts on residents, businesses, and road users. The DEIS analysis finds the Project construction to create net economic benefits but does not address the distributional impacts of construction costs that will disproportionately affect the local residents and businesses of ANC 6E. The Commission recommends that further mitigations be contemplated that directly compensate residents and businesses for the costs and disruption of a multiyear construction project.

ANC 6E recommends the final EIS to evaluate tunneling technologies as a strategy to mitigate the negative impacts of cut-and-cover construction. The District of Columbia Water and Sewer Authority (“DC Water”) recently completed a tunnel boring project from the Anacostia River to a location within ANC 6E for a major stormwater management project, which could provide a template for a less-intrusive construction method for the MAGLEV Project.¹²

Conclusion

In summary, ANC 6E has several concerns about the MAGLEV project, including the evident prioritization of automobile access/egress over other modes for passenger arrival and departure, the lack of a single Metrorail station connection, and the proposed 1,000 space parking garage in a downtown neighborhood which already has significant street congestion. In addition, ANC 6E has concerns about the lack of any specific construction mitigation impact plan for our neighborhood residents and businesses.

The FRA and the Project team overlooked the opportunity to integrate the Mount Vernon East station into an intermodal transportation hub that encourages intermodal transit and active transportation (walking, biking, scooting) and discourages automobile usage (park-and-ride, taxis, TNCs, and kiss-and-ride). The DEIS should further analyze and propose mitigations that address the negative impacts on the surrounding community in the realms of transportation, air quality, and construction impacts.

¹² <https://www.dewater.com/nebp>