



SENT VIA EMAIL

January 31, 2017

JANET CAMPBELL-LORENC
Director, Business Development

Corporate Planning

Mr. Bradley M. Smith
Director of the Office of Freight and Multi-modalism
Maryland Department of Transportation
7201 Corporate Center Drive
Hanover, Maryland 21076

RE: SCOPE COMMENTS / BALTIMORE-WASHINGTON SUPERCONDUCTING MAGLEV PROJECT EIS

Dear Mr. Smith:

Amtrak is pleased to submit comments on the scope of the Federal Rail Administration's (FRA) and Maryland Department of Transportation's (MDOT) Environmental Impact Statement (EIS) for the Baltimore-Washington SCMAGLEV project.

Amtrak provides intercity passenger rail service over 21,000 route miles in 46 states, the District of Columbia, and Canada. Amtrak provides *Acela Express*, *Northeast Regional*, *State Supported*, and *Long Distance* rail services between Boston, New York City, Philadelphia, Baltimore and Washington, D.C. As majority-owner of the Northeast Corridor (NEC), Amtrak provides coordinated passenger and freight rail service planning for the NEC as well as infrastructure access and operational support to eight commuter rail authorities and four freight rail operators. Amtrak's experience as the U.S. high-speed rail operator and NEC end-to-end user provides a unique perspective and insight about the Baltimore-Washington passenger rail transportation network.

Amtrak has several concerns with the scope of the Baltimore-Washington Superconducting Maglev (SGMAGLEV) project as described below.

- 1. NEC FUTURE analyzed passenger rail transportation needs between Baltimore and Washington and discarded the new alignment alternative.**

The NEC FUTURE program has already addressed the mobility challenges of the Baltimore-Washington, DC travel corridor with a focus on the role of passenger rail in meeting those challenges. FRA evaluated future transportation needs and considered the capacity constraints of the total transportation system including rail, highway, and air and completed a programmatic EIS. The EIS focused on technology-neutral rail passenger technologies, and although a new alignment was considered, the new alignment option was ruled out. Instead, a preferred alternative focused on improving the existing rail alignment was selected.



2. The framework for passenger rail investment between Baltimore and Washington, DC is already in place.

Amtrak, as owner of the NEC between Baltimore and Washington DC, works collaboratively with the FRA, the Northeast Corridor Commission, Maryland, MTA MARC, VRE, DDOT, WMATA and Virginia to solve problems, prepare plans and invest in passenger rail between Baltimore and Washington, DC. Together, the stakeholders have agreed upon a process to develop and implement multi-year investment plans with leadership by the NEC Commission. For longer range NEC investments, NEC FUTURE has already provided the framework for the Passenger Rail Corridor Investment Plan through 2040 and beyond. The proposed maglev scope is wholly contrary to the passenger rail investment framework that has been collaboratively developed by the region's stakeholders.

3. The ability to evaluate the environmental consequences of Maglev is unclear.

The maglev technology proposed is not a proven passenger rail technology. The technology has yet to be commercially proven. Data and experience are not yet available to evaluate the potential effects of maglev on the economy, transportation system, and the human and natural environment as is required in an EIS. Additionally, BWRR has clearly indicated that this is only the first segment of a SCMAGLEV line extending from Baltimore to Boston, Massachusetts to the north, and from Washington D.C. to Charlotte, North Carolina to the south, which indicates that the current maglev EIS scope does not provide true independent utility.

4. Substantial investment in passenger rail transportation is already underway between Baltimore and Washington, DC.

Amtrak questions the competing priorities between the Baltimore-Washington SCMAGLEV project – which calls for the construction of a separate maglev network with new guideway, stations and maintenance facilities, and anticipates funding from a mix of federal and private sources – and the NEC FUTURE's EIS to renew and modernize the NEC infrastructure between Washington, Baltimore, Philadelphia, New York City and Boston.

NEC FUTURE has confirmed the need for major passenger rail investments on the existing corridor between Baltimore and Washington DC including the replacement of the Baltimore & Potomac Tunnels, additional right-of-way and track segments, and modernization and expansion of Washington Union Station. These and other crucial NEC projects are already well along in the planning process, with several projects having completed environmental clearance and preliminary engineering. Over the next five to ten years, the cost to complete will require a substantial financial commitment from the Federal government, Amtrak and others, commitments that have the potential to be in direct competition with the plans for maglev.

BWRR has now openly stated that further public investment will be pursued for maglev. However, as noted above, major public passenger rail investment has already been committed and is underway. Public/private investment is also already underway. Amtrak has taken out a \$2.5 billion loan with the FRA to purchase new high speed trains and construct infrastructure needed to optimize high speed rail service between Baltimore and Washington DC.



The completion of NEC FUTURE was a landmark achievement and key affirmation of Amtrak's long-held view that rebuilding and expanding the Northeast Corridor is essential for the growth and prosperity of the entire region. After four years of study by the FRA, which involved the use of significant financial and human resources, and the engagement of all stakeholders – the Federal government, state, cities, the railroads and the public – the recently-published Final EIS for NEC FUTURE recommends a planning and investment approach to address the NEC's current and future passenger rail needs. This report should remain the prevailing guide for outlining the pathway of passenger rail.

We look forward to addressing these concerns with MDOT and FRA.

Sincerely,

A handwritten signature in black ink that reads "Janet Campbell-Lorenc". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Janet Campbell-Lorenc, AICP
Director, Business Development

cc: Stephen Gardner
Karen Gelman
Jeff Gerlach
Thomas Moritz