
Comments about 4B\$ plan for Baltimore Metropolitan

Jun. 09

Lori Franceschi reno5022@gmail.com

To: **Baltimore Metropolitan Council (BMC)** H2050@publicinput.com

There's a lot of stuff I could say, but really, the thing that stands out the most is:

Basically none of this money is for improving stuff INSIDE Baltimore.

Is that correct?

Who cares about highways, and all the crap? The roads in the city are enough to damage most vehicles. There is no rail; and 4b\$ would fund that.

Very upset and from my perspective, total waste of public funding, since it has a negative impact on living inside the city.

Fwd: Environmental Concerns

Brian Seel brian.seel@gmail.com

To: **Baltimore Metropolitan Council (BMC)** H2050@publicinput.com

I am just going to resend the comments from last year, which you seemed to ignore. This plan is awful.

----- Forwarded message -----

From: **Brian Seel** <brian.seel@gmail.com>

Date: Wed, Jun 17, 2020 at 10:06 AM

Subject: Environmental Concerns

To: <comments@baltometro.org>

Its 2020, and we are still rolling out millions of dollars for projects that will expand roads, and encourage driving, but are allocating just a few million for bike projects, and a bit more for generally unconnected transit projects that will do very little to move the needle on getting people to use alternatives to driving.

This document is a plan for how we will move forward over the next few years, and it is basically doubling down on the 1950's car and highway mentality. While climate change is not as steep of a curve as COVID, its still a looming crisis, and many of these projects will be around and in use 50 years from now. How can we still keep doing the same thing we have in the past?

Seriously, are we still going around and widening the beltway? Even a tenth of that \$281 million could be revolutionary for bike or transit projects.

Please, do better.

July 7, 2021

Re: Public Comments on Baltimore Region Transportation Improvement Program FY 2022-2025

Dear Baltimore Metropolitan Council's Baltimore Regional Transportation Board:

The Greater Washington Partnership is a civic alliance of the region's leading employers and entrepreneurs committed to making the Capital Region—from Baltimore to Richmond—one of the world's best places to live, work, and build a business. We look forward to continuing to partner with the Baltimore Metropolitan Council (BMC) and its member jurisdictions to advance shared priorities around bus and transit prioritization, a seamless regional rail network, and the expansion of the regional trail network; solutions the Partnership advocated for in our [Blueprint for Regional Mobility](#).

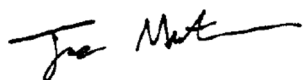
The Partnership offers the following comments for BMC to consider as the Board finalizes the Baltimore Region Transportation Improvement Program (TIP) for FY 2022-2025:

- We commend the Board for the addition of the East-West Priority Bus Corridor to the TIP, an essential project to better connect the Baltimore metro area, improve transportation equity, and improve access to employment centers for East and West Baltimore residents. This is a critical first step to realizing the region's Central Maryland Regional Transit Plan.
- With MDOT MTA, we encourage you to work to identify other short-term Priority Bus Corridors projects from the Central Maryland Regional Transit Plan that can be advanced in the next four years, such as the North-South corridor from Towson to Downtown Baltimore City.
- With Amtrak and MDOT, we encourage you to coordinate to see if there is a need to identify near-term funds in the TIP for the replacement of the B&P Tunnel, which will be named the Frederick Douglass Tunnel, or speed up the redevelopment and track enhancements at Baltimore Penn Station. The tunnel replacement project was formally announced June 18, with Governor Hogan directing MDOT to coordinate with Amtrak and USDOT to create a funding plan for the project which is still a few years away from breaking ground.
- With the City of Baltimore, we encourage you to identify funding opportunities in the TIP for the completion of the Baltimore Greenway Trails Network, a 35-mile loop around the city of Baltimore that will provide safe pedestrian and bike access to many of the city's employment centers. 25 miles are already complete, but a few segments, such as the Norfolk Southern Corridor and the BGE corridor, are not currently in active design or construction phases.
- With the City of Baltimore, MDOT, and the Federal Delegation, we encourage you to support a planning process to remove the Highway to Nowhere (US 40) that divides West Baltimore and limits social and economic mobility for far too many residents and businesses.
- As the Baltimore Region Transit Governance and Funding Study is expected to wrap up this summer, which identifies options for governance and funding reform, we encourage the Board to identify a next step, such as study that identifies the preferred reform option and lays out a regional implementation strategy.



The Greater Washington Partnership would like to thank BRTB Board Chair the Honorable Stephen Wantz, Executive Director Michael Kelly, Director of Transportation Planning Todd Lang, and the entire board for their leadership in advancing transportation priorities that can make Baltimore and the Capital Region one of the best places to live, work, and build a business.

Sincerely,



Joe McAndrew
Vice President, Transportation
Greater Washington Partnership



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PAUL EMMART Comments RE: The Baltimore Regional Transportation Board (BRTB), as the metropolitan planning organization (MPO) for the Baltimore region request for public comments on two transportation-related documents – the draft *2022-2025 Transportation Improvement Program (TIP)* and the associated *Air Quality Conformity Determination*.

Dear Sir/Madam,

I appreciate all the good work done by so many dedicated staff as demonstrated in these documents. I am also grateful for the level of transparency offered by this opportunity to comment. The TIP is a very large, broad effort with multiple reports, studies, appendices and maps. The entire effort seems to be situated within a larger government oversight framework involving the National Ambient Air Quality Standards (NAAQS) and to fulfill other requirements of the Clean Air Act, which are implemented through the Maryland State Implementation Plan (SIP). Moreover, the TIP involves an enormous budget, all of which is overwhelming to a lay audience. So, I will offer comments that I hope will be relevant and useful to the draft.

1. Incorporate health impacts to the modeling & assessment modules

In the TIP Appendix C, titled Evaluating Potential Effects of Projects, there are several measured metrics to evaluate whether certain groups of people within a Transit Analysis Zone (TAZ) will fare better or worse than the regional average. It says, “The measures analyzed indicate that the surface transportation investments in Maximize2045 should not have disproportionate impacts on EJ TAZs. The measures are discussed below in the order the results were presented above. They are grouped broadly into accessibility measures (jobs and shopping), travel time measures (commute, shopping purposes, closest hospital), and proximity measures (supermarket, hospital, college/university).” The metrics identified are not public health risk assessment criteria. In my view there should be evaluations of expanded human health metrics related to the TIP projects and the human health risks should be weighted and included in the prioritization of projects to be funded.

The TIP and the Conformity Determination are required because the Baltimore region does not meet the national standard for ground-level ozone. As a result, the EPA has classified the region as a “nonattainment” area with regard to the 8-hour ozone standard. The EPA also has classified the region as a “maintenance” area for carbon monoxide (CO) and fine particulate matter (PM2.5).

Further, in the Baltimore Metropolitan Planning Organization Baltimore Regional Transportation Board Resolution #21-01, one of the final clauses states, “WHEREAS, the purpose of socioeconomic forecasting analysis is to provide inputs to decision makers to assist with determining the overall travel demand and air quality effects of growth, at the regional level, on future year highway and transit networks;” PDF. 47. The *air quality effects of growth* should in my view include the quantification of the impact on environmental justice and human health outcomes. The TIP should incorporate an alternatives analysis to determine which projects are

most necessary from the perspective of public health and which are most damaging. Without these linked aspects, the decision makers are not evaluating the full set of “effects.”

For example, it is clear that many aspects of the TIP can be evaluated and modeled. Look for instance to the “Traffic Signal Retiming” highlight which says, “In CY 2019, MDOT SHA reviewed six systems containing 42 signals in the Baltimore region. Timing changes were made on five systems containing 34 signals. Delay was reduced by 214,100 hours and fuel consumption was reduced by 51,500 gallons. It is estimated that NO_x, VOC, and CO emissions were reduced 0.5%, 1.3%, and 1.6% respectively for the signal systems.” (Appendices pp. I-11). This is valuable information but it is lacking the impact analysis on health in an urban area like Baltimore that it needs. What do these percentages mean in terms of health, beyond driving efficiency? One really wants to know instead, what level of avoided adverse health impact can one project deliver as opposed to another? Traffic can cause air pollution, and exposure to air pollution can have negative reproductive effects. Please see, this [article by the NIH](#) which concluded, “The observed results, with remarkable similarity in two independent locations, suggest that higher traffic-related air pollution levels are associated with pregnancy loss, with strongest estimates between the 10th and 20th gestational weeks.”

2. Develop planning scenarios which exceed the required thresholds and base projects on the most stringent criteria, not necessarily the required minimum

If I read the documents correctly, the design value for the Baltimore region is 75 ppb as of the end of the 2020 ozone season, indicating that it is currently meeting the 2008 NAAQS. Yet the volume of traffic will rise over the long-term planning horizon. For example, Baltimore Region Travel Demand Model (Version 4.4a) shows [here](#) (at p4) that demand increases for model simulated travel for 2012, 2020, 2030, 2040, and 2045 conditions for an average Baltimore region weekday. Summer Weekday VMT is projected to rise from nearly 81M miles in 2020 to 95M miles by 2045 (Appendix C pp 3). Therefore, the planning needs to ratchet down and plan for a horizon that is even stricter in term of the federal standards applied. Please see this recommendation dated 7/13/20 from the American Lung Association [here](#) which advocates for an ozone standard of no more than 60 ppb. The ALA says, “Two studies of Canadian cities found evidence of harm where the ozone levels remained below 70 ppb for 10 years. Even in these cities, where the air quality would have met the current standards, epidemiologists found ozone exposures associated with increased risk of emergency department visits for lower respiratory diseases and for childhood asthma...We urge EPA to listen to the best scientific evidence and the Clean Air Act and set the ozone pollution standard at no higher than 60 ppb to safeguard public health.”

The same general comment goes for the statement in the Conformity document that it uses “the base year 2012.” pp15. Although it clearly states, “On February 22, 2016, EPA determined the motor vehicle emissions budgets in the Baltimore 1997 8-hour Ozone Standard RFP SIP for 2012 to be adequate for use in conformity determinations. The conformity testing for the 2008 ozone NAAQS was performed using these budgets for VOCs and NO_x. The conformity determination for the 1997 ozone NAAQS and the 2015 ozone NAAQS also uses these budgets for VOCs and NO_x.” The question to me is why would Maryland base its calculations on a

budget that is outdated by 9 years? Even if, the 2012 baseline is required to be used, what alternative estimation and analysis exists from some other more recent base year?

3. The TIP Budget Dedicates Too Small a Portion to Emission Reduction Strategy (ERS) Projects

The Interactive map shows one (1) project planned within a four (4) year period for the City of Baltimore, population 600,000, in a \$4B plan (i.e., Greenway Middle Branch Phase 2: a 0.8 mile bike path) and a new sidewalk on Kent Island (SHA: MD 835C Sidewalk: Cockey Lane to Old Love Point Road). Unless I am missing something this is not well balanced. I urge the TIP staff to seek more opportunities and direct more funds to ERS as opposed to other surface projects.

4. Address Climate Change Reduction Actions in Relation to the TIP

The term 'climate change' is used only six times in the TIP and it is identified in footnotes for the road projects, for example under 5D which is described as "Connection to Long-Range Transportation Planning Goals: Most of these projects will improve safety and traffic flow operations on the existing highway system without major new construction. 1.B Improve System Safety -- Apply safety-related management and operations techniques. 4.D Increase Mobility -- Apply mobility-related management and operations techniques. 5.D Conserve and Enhance the Environment -- Reduce greenhouse gas emissions in accordance with state and local sustainability and climate change plans." If there is more to add about climate change specifically, please say so. How will these TIP projects increase or decrease impacts from climate change by 2045?

Associated with this question is also the need to identify the cumulative impact from TIP projects. I believe that all TIP projects should be accounted for and not made exempt or non-exempt and should be explicitly modeled to understand cumulative effect. As the Conformity Determination states,

All projects from the 2022-2025 TIP were reviewed and categorized as either "exempt" or "nonexempt." Projects that are exempt from the conformity requirement may proceed forward even if there is no conforming plan and TIP. Exempt projects are identified in §93.126 and §93.127 of the Conformity Rule. Exempt projects in the TIP generally include projects with neutral or de minimis emissions impacts such as road rehabilitation and resurfacing, streetscape improvements, bridge replacements and bicycle and pedestrian facilities...According to §93.122 of the Conformity Rule, non-exempt, non-regionally significant projects are **not required to be modeled explicitly,**" pp6-7.

I urge the TIP staff to quantify the environmental and human health impacts from road expansion. For example, the TIP contains projects which widen and develop new roads for more traffic which will generate more air pollution.

Examples

+ Exempt project: C-1-22 This project will replace **and widen** the superstructure on bridge nos. 0303403 and 0303404 along eastbound and westbound US 40 over Little Gunpowder Falls and bridge nos. 0303503 and 0303504 along eastbound and westbound US 40 over Big Gunpowder Falls

+ Non-exempt project: C-2-3: This project will design **and widen** Snowden River Parkway by adding a third lane in each direction and shared-use paths from Broken Land Parkway to Oakland Mills Road.

+ C-2-5 **Widening**: 11.25 miles, 6 to 8 lanes. I-95 Express Toll Lanes Northbound Extension and C-2-7: I-695: I-70 to MD 43

Another example is the Howard Street Tunnel expansion in Baltimore: train traffic will increase once the project completes. Please see article in the Baltimore Sun, [here](#). What will be the health impact on local residents who are clearly indicated as within an EJ Zone on the interactive project map as a minority population having an above average household poverty rate relative to state averages?

I would also like to have the benefit of knowing what the impact of associated air emissions from air/port and rail transportation sectors, which should be factored in to the TIP. It seems as if the transportation modes are bifurcated into surface transportation vs non-surface (aviation and port). But surely, these other modes impact the regional citizens within the TIP since air pollution doesn't follow political boundaries and should be considered?

This leaves the reader of the TIP with a sense that there is an incomplete accounting. Unless there are documents somewhere, even referenced in footnotes, it is impossible to sum up the whole picture regarding air pollution. Especially without modeling information (other than "pass" or "fail") to inform what sectors contribute the most and how much they need to reduce in order to meet the NAAQS at a date certain. Basic information, for example, what is the trajectory for meeting NAAQS? When? If the unmodeled exempt and non-exempt projects are at *de minimus* levels, what are the strategies for transportation improvement that will reach the NAAQS goals and why are they (i.e., those significant improvements) not itemized in the TIP?

If the conformity determination process ensures that long-range transportation plans and short-term programs contribute to air quality improvement objectives delineated in the State Implementation Plan, then it is important to identify and link the SIP to the TIP. This does not seem to be clear, as far as I understood it.

Baltimore Regional Transportation Board
1500 Whetstone Way
Suite 300
Baltimore, MD 21230

July 9, 2021

RE: Draft 2022-2025 Transportation Improvement Program

Dear Members of the Baltimore Regional Transportation Board,

Thank you for the opportunity to provide input on the Draft 2022-2025 Transportation Improvement Program (TIP) for the Baltimore region. The TIP can be simply described as the list of regional transportation projects using federal funds over the next four years. However, we believe it is important to look at this document not simply as a collection of individual projects, but as a program that reflects our region's transportation priorities.

Many of the undersigned organizations submitted comments for last year's TIP (2021-2024) expressing dismay at what that program's planned spending revealed about our region's priorities. At the time we wrote:

"Unfortunately, this Draft TIP does not prioritize spending in a way that will do anything but worsen the interwoven crises facing our state and our world. The COVID-19 pandemic is an acute crisis that has highlighted how black people and other communities of color have been disproportionately impacted by poor air quality. Meanwhile, the climate crisis continues to mount with the transportation sector as the number one source of greenhouse gas emissions. And the racial and economic disparities underlying it all are, in part, due to decades of transportation and land use decisions designed to exclude and segregate black people."

Those realities have not fundamentally changed in the last year. Despite some improvements in spending by category, the 2022-2025 TIP is still heavily tilted towards spending on fossil fuel infrastructure that exacerbates more problems than it purports to solve. In the previous TIP we noted that the \$1.3 billion for highway capacity was 650 times the \$2 million programmed for transit capacity. In this year's TIP, there are zero dollars for transit capacity. So despite a reduction in the highway capacity category (still almost a billion dollars), mathematically speaking, the region is now spending infinitely more on new highways than it is on new transit. The consequence of spending priorities like these is ever more driving. No wonder Maryland was setting new highs for vehicle miles traveled per capita shortly before the pandemic.

As discussed in last year's comment letter (attached for reference) these spending priorities are ineffective, inequitable, unhealthy, and environmentally unsustainable. However, we highlighted

that many members of the BRTB have expressed a desire to change course toward a cleaner, more balanced transportation future for the region. In that letter we proposed a baby step in the right direction would be to not add any new highway capacity projects to the proposed TIP that were not already in previous TIPs. Although the Board declined to do so last year, we are pleased to see that Draft 2022-2025 TIP does not include any new highway capacity projects being introduced. The region is in a deep transportation hole and putting down the shovel on more highways is the first step in getting out of it.

To build on this step, it will be critical to ensure that this year is not an anomaly and we continue to avoid introducing new highway capacity projects to the TIP. To illustrate why, we can look back to the highway capacity projects that were newly added to last year's TIP. Four of the five projects are still in the program and one is listed as "between funding stages". Although they represent relatively small dollar amounts now, as the projects work their way through the design and construction process the full construction costs will be tens of millions of dollars in future TIPS.

Last year we proposed that funds should be re-directed to three areas: (1) the Maryland Transit Administration's (MTA) backlog of deferred maintenance as documented in the 2019 Capital Needs Inventory (CNI), (2) ADA compliance near transit stops and stations, and (3) completing bike trails such as the Baltimore Greenway Trails Network, the Baltimore Separated Lane Network, Anne Arundel County South Shore Trail and the North Point Trail. Comparing those requests to the Draft 2022-2025 TIP we find:

1. The CNI is not directly referenced in the TIP so it is difficult to verify whether funding to address those specific needs has increased. However, we are encouraged to see that this year's TIP has the highest amount, both in real dollars and as a percentage of the budget, programmed for Transit Preservation since the 2020 TIP (when Transit Preservation was first broken out as its own category).
2. ADA is referenced many times in many projects throughout the TIP, but since it is not its own discrete category it is difficult to know whether funding has increased. However, a recent lawsuit against Baltimore City regarding its ongoing lack of ADA compliance suggests that this is an area where the region should be directing more resources.
3. Similar to ADA, bicycle facilities are often spread throughout many projects and it's difficult to track overall regional spending levels on bicycle facilities. We're glad to see a portion of the Greenway Trails Network included in this program. Other opportunities like connecting the Torrey C. Brown Trail to the Jones Falls Trail, and connecting the Middle Branch Trail to the BWI and Baltimore and Annapolis Trail would improve city to county connections and would make the region's trail network truly regional. We do not see evidence that other trails or separated bike facilities are being prioritized.

Finally, since the previous TIP was adopted, the region approved MTA's Central Maryland Regional Transit Plan (RTP). The plan presented a vision for improving and expanding transit in the region over the next 25 years. We are pleased to see a new project added to this year's TIP, "East-West Bus Corridor", which corresponds with an Early Opportunity transit corridor identified in the RTP. However, that is the only project that mentions the RTP. The Plan will only be useful and improve outcomes for riders if it is being implemented and evidence of that will be when elements start to get into the TIP. We encourage the Board to work proactively to introduce into the TIP more RTP elements, such as corridor studies, transit hubs, and ADA compliance.

The transportation status quo continues to hold this region back from reaching its full potential, economically, socially, and environmentally. It is up to the leaders of this region to decide whether we spend that money in ways that reinforce the status quo or in ways that repair the damage caused by decades of racism, disability discrimination, pollution, and inequity. We are encouraged that the Board has taken a small step in the right direction by turning the dial down on highway capacity projects and toward preservation of our existing system. We hope that this signals a lasting change in direction for the region and we encourage our regional leaders to take bolder steps moving forward.

Sincerely,

1199 SEIU United Healthcare Workers East	Downtown Residents Advocacy Network
Baltimore Co. Progressive Democrats Club	Fund for Educational Excellence
Baltimore MARC Riders	Klaus Philipsen, FAIA, ArchPlan Inc.
Baltimore Transit Equity Coalition	Maryland Consumer Rights Coalition
Bikemore	Maryland Sierra Club
Central Maryland Transportation Alliance	Our Revolution Baltimore City/County
Coalition for Smarter Growth	Rails-to-Trails Conservancy
Consumers for Accessible Ride Services	Union of Concerned Scientists
Disability Rights Maryland	

Attachment A - Copy of comment letter for Draft 2021-2024 TIP

Baltimore Regional Transportation Board
1500 Whetstone Way
Suite 300
Baltimore, MD 21230

July 23, 2020

RE: Draft 2021-2024 Transportation Improvement Program

Dear Members of the Baltimore Regional Transportation Board,

Thank you for the opportunity to provide input on the Draft 2021-2024 Transportation Improvement Program (TIP) for the Baltimore region. The TIP can be simply described as the list of regional transportation projects using federal funds over the next four years. However, we believe it is important to look at this document not simply as a collection of individual projects, but as a program that reflects our region's transportation priorities.

Unfortunately, this Draft TIP does not prioritize spending in a way that will do anything but worsen the interwoven crises facing our state and our world. The COVID-19 pandemic is an acute crisis that has highlighted how black people and other communities of color have been disproportionately impacted by poor air quality^[1]. Meanwhile, the climate crisis continues to mount with the transportation sector as the number one source of greenhouse gas emissions^[2]. And the racial and economic disparities underlying it all are, in part, due to decades of transportation and land use decisions designed to exclude and segregate black people^[3].

And yet, over the next four years, the Baltimore region plans to spend a whopping \$1.3 billion on widening highways and a miserly \$2 million on new transit. That's 650 times more on new fossil fuel infrastructure that exacerbates more problems than it purports to solve. It continues a five-year trend of spending more on new highway capacity.

As discussed below, the spending priorities in the Draft TIP are ineffective, inequitable, unhealthy, and environmentally unsustainable. Moreover, the spending levels and mix of

projects do not represent the policy positions and ideals that many BRTB members espouse.

Ineffective

The single largest category of spending in the Draft TIP is for highway capacity projects that are supposed to “fix congestion”. In fact, widening highways has a poor track record for relieving traffic congestion. For decades, study after study has found that expanding road capacity does not relieve congestion for very long because people will drive more and soak up that capacity.

The most recent study to come to this conclusion was released just last year and found that a 1 percent increase in lane-miles induced a 1 percent increase in vehicle-miles traveled (VMT). Moreover, after just five years, the short-term increases in speed are wiped out and congestion returns to pre-project levels^[4].

According to a Transportation Alliance analysis^[5] of the Texas Transportation Institute’s Urban Mobility Report, between 1982 and 2011, the Baltimore region nearly doubled its amount of freeway lane miles (from 885 lane miles to 1,561 lane miles). During that same time, the region’s population grew from 1.7 million to 2.5 million – a 48% increase.

Freeway expansion far outpaced population growth, but it did not relieve traffic congestion. In fact, by every measure congestion got worse. The amount of congested lane miles increased from 31% to 58%. The annual hours of delay per auto commuter quadrupled--from nine hours a year to 41 hours a year. And the annual cost of congestion increased from \$96 million per year to \$1.5 billion per year. According to data from the American Community Survey, the average commute time in Maryland continues to increase each year.

Growth in highway lane miles significantly outpaced population growth and yet, congestion got worse, not better. Why? Because more lane miles, and the accompanying auto-dependent suburban and exurban development that results, just meant people were forced to drive more. And we haven’t provided many other transportation choices for residents. In the Baltimore region, we haven’t built any new high-quality, rapid transit since the Light Rail opened a generation ago.

Inequitable

Investments in transportation do not impact all populations equally. The proposed 21-24 TIP’s lopsided investments in widening highways are aimed at improving mobility for higher income people and those with private automobiles. Additionally, it will further

entrench structural inequities that disadvantage some populations over others. For example, as mentioned above, a 2019 study^[6] found that in the U.S. air pollution is disproportionately caused by white Americans' consumption of goods and services, but disproportionately inhaled by black and Hispanic Americans.

In addition to public health inequities, this Draft TIP will further entrench economic inequities. In neighborhoods that are historically disinvested and economically distressed, more than a third of households have no access to a vehicle and these households are cut off from economic opportunity by a transportation system so heavily tilted towards the automobile. According to studies from the University of Minnesota's Accessibility Observatory, a resident of the Baltimore region can get to any job in the region in less than an hour by automobile. 100% of jobs are accessible. However, that resident would only be able to reach about 11% of the region's jobs in less than an hour by transit.

The investments proposed in this TIP will exacerbate the patterns that have left neighborhoods cut off from economic opportunity, suffering high unemployment, entrenched poverty, and disinvestment.

Unhealthy

Dr. Gaurab Basu, from the Center for Health Equity Education & Advocacy at Cambridge Health Alliance and the Department of Global Health & Social Medicine at Harvard Medical School, recently wrote: “[o]ne of the best prescriptions I could write for my patients is a clean, equitable, and sustainable transportation system. Transforming our dirty transportation system has long been an urgent public health issue. Air pollution has always made us sick; it increases the risk of heart attacks, childhood asthma exacerbations, strokes, and premature death. But COVID-19 puts an even greater impetus on us to end the use of internal combustion engines and fossil fuels.”

He went on to cite a recent Union of Concerned Scientists study^[7] which found that “communities of color breathe in, on average, 66 percent more PM_{2.5} air pollution from vehicles than white residents in the Northeast and mid-Atlantic region.” It also found that Maryland's median PM_{2.5} concentration from on-road vehicles exceeds the regional average. A separate Harvard study has found that increased exposure to PM_{2.5} puts individuals at greater risk of dying from COVID-19^[8].

Environmentally unsustainable

Widening highways while shortchanging investment in public transportation does not meet the challenge of climate change. Last year, Marylanders drove more miles per capita than ever before, the result of adding more capacity to the public roadway network than to

alternatives like buses, trains and biking. As one transportation policy expert puts it, “ceasing the continuing expansion of the highway and roads network is essential to any effort to reduce the carbon footprint of transportation which is now the single largest contributor to America’s greenhouse gas emissions”^[9]

In October 2018 the Intergovernmental Panel on Climate Change published a 700-page report on the impacts of global warming and what it would take to reduce greenhouse gas emissions to limit warming to 1.5 degrees Celsius. To achieve this, the report states that global CO₂ emissions must decline by about 45% from 2010 levels by 2030 and reach net zero around 2050. This means we have just 10 years to drastically cut emissions if we are to mitigate the rising sea levels, droughts, and storms that result from global warming. Reducing emissions from the transportation sector will be critical to this effort and those reductions will not happen if we continue to widen highways and increase our dependence on cars.

Adding more lanes of highway will have other significant environmental consequences. Additional lane miles add impermeable surface that will increase stormwater runoff into streams, rivers, and the Chesapeake Bay. Additional lane miles and additional capacity for cars will result in increased tailpipe emissions, currently the largest source of air pollution in Maryland. Additional lane miles will encourage auto-dependent residential and business development that will result in conversion of more farmland and natural lands to land covered with asphalt and buildings.

Change is possible

The BRTB has an opportunity to change course away from these outcomes and toward a cleaner, more equitable transportation future. Many members have already expressed a desire to do so.

County Executive Olszewski has stated priorities for “building robust public transportation and infrastructure” and “promoting smarter development.”^[10]

County Executive Ball wants to “increase accessibility through a truly multi-modal transportation system” and to alleviate traffic and protect our environment “by reducing the number of cars on our roads.”^[11]

County Executive Pittman recognizes the importance of the Central Maryland Regional Transit Plan and promises to “be at the forefront of transportation planning that focuses on moving people rather than cars.”^[12]

Mayor Buckley has said, “The future is not cars. The future is how we’re going to get around on electric scooters and bikes and things like that have less impact on the planet.”^[13]

These statements represent a commitment to a cleaner, more balanced transportation future for the region. But unless you put real resources behind these sentiments, it won’t happen.

There’s an old saying that when you’re in a hole that you want to get out of, the first thing you have to do is stop digging. Well, we are in a deep transportation hole. A transit system that breaks down more often than just about every transit system in the country^[14]. Rising commute times. Disconnected communities. Chronic poor air quality. We have to stop digging, and the way we propose to do this is to stop relentlessly adding new highway capacity projects to the TIP.

We understand that the vast majority of the highway capacity spending is on two projects already underway (the I-95 Express Toll Lane Extensions and I-695 widening), and that it may be impractical to cancel these projects. However, there are five highway capacity projects that are new to the 21-24 TIP (see Table II-2: New Projects in the 2021-2024 TIP). For some of these projects, the TIP funding only covers early design costs and full construction will cost tens of millions more in upcoming TIPs. Once a project gets into a program like this, it is harder to divert the money to other uses. We shouldn’t be starving the project pipeline for transit while adding project after project to the highway pipeline.

The new highway capacity projects only total about \$45 million. Canceling them would bring the highway capacity budget from 30.68% of the TIP budget to 29.62%. Canceling these projects is not some radical change – it’s a drop in the bucket. It’s simply putting down the shovel so the hole doesn’t get any deeper. But it is the necessary first step.

We respectfully request that you remove the five new highway capacity projects from the 21-24 TIP and redirect those funds toward projects that help to build the region many of you say you want. The funds could go to any number of worthy projects, such as:

- Addressing the \$1.5 billion backlog of deferred maintenance identified in MTA’s Capital Needs Inventory^[15]
- Making sidewalks near bus stops and train stations compliant with the Americans with Disabilities Act

- Completing bike trails like the Baltimore Greenway Trails Network, the Baltimore Separated Lane Network, the Anne Arundel South Shore Trail, and the North Point Trail

2020 is a pivotal year in the United States. It is becoming more clear than ever that we cannot accept the status quo in so many areas, including health care, criminal justice, the environment, and the economy. Transportation has to be a part of that change, too. The Draft 21-24 TIP proposes to spend over \$4 billion of taxpayer money. It is up to the leaders of this region to decide whether we spend that money in ways that repair the damage caused by decades of racism, pollution, and inequity, or in ways that just keep digging a deeper hole.

Sincerely,

Baltimore Commission on Sustainability

Colin Beckman, Baltimore Penn Station MARC Riders Group

Liz Cornish, Bikemore

Charlie Goedeke, HoCo Climate Action

Samuel Jordan, Baltimore Transit Equity Coalition

Paul Kowzan, BRTB PAC Member-Baltimore City Resident

Brian O'Malley, Central Maryland Transportation Alliance

Cecilia Plante, Maryland Legislative Coalition

Emily Ransom, Clean Water Action

Jimmy Rouse, Transit Choices

Stewart Schwartz, Coalition for Smarter Growth

Josh Tulkin, Maryland Sierra Club

CC: Mike Kelly, BMC

Todd Lang, BMC

Regina Aris, BMC

Zach Kauffman, BMC

- [1] Christopher W. Tessum, et al, "Inequity in consumption of goods and services adds to racial-ethnic disparities in air pollution exposure," Proceedings of the National Academy of Sciences March 2019, 116 <https://www.pnas.org/content/116/13/6001>
- [2] U.S. Energy Information Administration <https://www.eia.gov/totalenergy/data/monthly/pdf/mer.pdf>
- [3] Ashish Valentine, "The Wrong Complexion For Protection.' How Race Shaped America's Roadways And Cities", NPR, July 5, 2020 <https://www.npr.org/2020/07/05/887386869/how-transportation-racism-shaped-america>
- [4] Kent Hymel, "If you build it, they will drive: Measuring induced demand for vehicle travel in urban areas," *Transport Policy* Vol. 76 (April 2019): 57-66 <https://www.sciencedirect.com/science/article/abs/pii/S0967070X18301720>
- [5] <https://www.marylandmatters.org/2019/09/04/opinion-more-roads-mean-more-congestion/>
- [6] Tessum, et al, "Inequity in consumption of goods and services adds to racial-ethnic disparities in air pollution exposure"
- [7] Union of Concerned Scientists, "Inequitable Exposure to Air Pollution from Vehicles in the Northeast and Mid-Atlantic", <https://www.ucsusa.org/sites/default/files/attach/2019/06/Inequitable-Exposure-to-Vehicle-Pollution-Northeast-Mid-Atlantic-Region.pdf>
- [8] Xiao Wu, et al, "Exposure to air pollution and COVID-19 mortality in the United States: A nationwide cross-sectional study" <https://projects.iq.harvard.edu/covid-pm/home>
- [9] Yonah Freemark, "Too little, too late? A decade of transit investment in the U.S.", TransportPolitic.com, <https://www.thetransportpolitic.com/2020/01/07/too-little-too-late-a-decade-of-transit-investment-in-the-u-s/>
- [10] <https://www.baltimorecountymd.gov/Agencies/executive/priorities.html>
- [11] <https://www.howardcountymd.gov/Branches/County-Executive/Reliable-and-Accessible-Infrastructure>

[12]

<https://www.capitalgazette.com/opinion/columns/ac-ce-column-steuart-pittman-20200218-ef3dhgfokvde5aapeaajcdd3ki-story.html>

[13]

<https://www.baltimoresun.com/maryland/anne-arundel/annapolis/ac-cn-annapolis-bike-ride-20200702-20200702-bu4kshp4avfwvjgxvh6u57uliu-story.html>

[14]

<https://www.baltimoresun.com/politics/bs-md-pol-buses-break-down-20200307-2xie6jw3bg3bp2y27umbhiuhi-story.html>

[15]

https://s3.amazonaws.com/mta-website-staging/mta-website-staging/files/Transit%20Projects/Capital/201907_MDOTMTA_CNI.pdf

Draft TIP Comments from Transit Choices

Jul. 09

Robin Budish robin@transitchoices.org

To: **Baltimore Metropolitan Council (BMC)** H2050@publicinput.com

Dear Baltimore Regional Transportation Board,

Please find attached our letter regarding the draft 2022-2025 TIP list of regional transportation projects requesting federal funding in the near term.

We appreciate the opportunity to share our comments.

Thank you.

Best regards,
Robin

Robin Budish | Director

Transit Choices

516 N. Charles Street, Suite 312

Baltimore, Maryland 21201

p 410.528.8696 c 410.340.4878

transitchoices.org

SEE ATTACHMENT

Baltimore Regional Transportation Board
1500 Whetstone Way
Suite 300
Baltimore, MD 21230

July 23, 2020

RE: Draft 2021-2024 Transportation Improvement Program

Dear Members of the Baltimore Regional Transportation Board,

Thank you for the opportunity to provide input on the Draft 2021-2024 Transportation Improvement Program (TIP) for the Baltimore region. The TIP can be simply described as the list of regional transportation projects using federal funds over the next four years. However, we believe it is important to look at this document not simply as a collection of individual projects, but as a program that reflects our region's transportation priorities.

Unfortunately, this Draft TIP does not prioritize spending in a way that will do anything but worsen the interwoven crises facing our state and our world. The COVID-19 pandemic is an acute crisis that has highlighted how black people and other communities of color have been disproportionately impacted by poor air quality¹. Meanwhile, the climate crisis continues to mount with the transportation sector as the number one source of greenhouse gas emissions². And the racial and economic disparities underlying it all are, in part, due to decades of transportation and land use decisions designed to exclude and segregate black people³.

And yet, over the next four years, the Baltimore region plans to spend a whopping \$1.3 billion on widening highways and a miserly \$2 million on new transit. That's 650 times more on new fossil fuel infrastructure that exacerbates more problems than it purports to solve. It continues a five-year trend of spending more on new highway capacity.

As discussed below, the spending priorities in the Draft TIP are ineffective, inequitable, unhealthy, and environmentally unsustainable. Moreover, the spending levels and mix of projects do not represent the policy positions and ideals that many BRTB members espouse.

Ineffective

The single largest category of spending in the Draft TIP is for highway capacity projects that are supposed to "fix congestion". In fact, widening highways has a poor track record for relieving

¹ Christopher W. Tessum, et al, "Inequity in consumption of goods and services adds to racial-ethnic disparities in air pollution exposure," Proceedings of the National Academy of Sciences March 2019, 116 <https://www.pnas.org/content/116/13/6001>

² U.S. Energy Information Administration <https://www.eia.gov/totalenergy/data/monthly/pdf/mer.pdf>

³ Ashish Valentine, "'The Wrong Complexion For Protection.' How Race Shaped America's Roadways And Cities", NPR, July 5, 2020 <https://www.npr.org/2020/07/05/887386869/how-transportation-racism-shaped-america>

traffic congestion. For decades, study after study has found that expanding road capacity does not relieve congestion for very long because people will drive more and soak up that capacity.

The most recent study to come to this conclusion was released just last year and found that a 1 percent increase in lane-miles induced a 1 percent increase in vehicle-miles traveled (VMT). Moreover, after just five years, the short-term increases in speed are wiped out and congestion returns to pre-project levels⁴.

According to a Transportation Alliance analysis⁵ of the Texas Transportation Institute's Urban Mobility Report, between 1982 and 2011, the Baltimore region nearly doubled its amount of freeway lane miles (from 885 lane miles to 1,561 lane miles). During that same time, the region's population grew from 1.7 million to 2.5 million – a 48% increase.

Freeway expansion far outpaced population growth, but it did not relieve traffic congestion. In fact, by every measure congestion got worse. The amount of congested lane miles increased from 31% to 58%. The annual hours of delay per auto commuter quadrupled--from nine hours a year to 41 hours a year. And the annual cost of congestion increased from \$96 million per year to \$1.5 billion per year. According to data from the American Community Survey, the average commute time in Maryland continues to increase each year.

Growth in highway lane miles significantly outpaced population growth and yet, congestion got worse, not better. Why? Because more lane miles, and the accompanying auto-dependent suburban and exurban development that results, just meant people were forced to drive more. And we haven't provided many other transportation choices for residents. In the Baltimore region, we haven't built any new high-quality, rapid transit since the Light Rail opened a generation ago.

Inequitable

Investments in transportation do not impact all populations equally. The proposed 21-24 TIP's lopsided investments in widening highways are aimed at improving mobility for higher income people and those with private automobiles. Additionally, it will further entrench structural inequities that disadvantage some populations over others. For example, as mentioned above, a 2019 study⁶ found that in the U.S. air pollution is disproportionately caused by white Americans' consumption of goods and services, but disproportionately inhaled by black and Hispanic Americans.

In addition to public health inequities, this Draft TIP will further entrench economic inequities. In neighborhoods that are historically disinvested and economically distressed, more than a third

⁴ Kent Hymel, "If you build it, they will drive: Measuring induced demand for vehicle travel in urban areas," *Transport Policy* Vol. 76 (April 2019): 57-66

<https://www.sciencedirect.com/science/article/abs/pii/S0967070X18301720>

⁵ <https://www.marylandmatters.org/2019/09/04/opinion-more-roads-mean-more-congestion/>

⁶ Tessum, et al, "Inequity in consumption of goods and services adds to racial-ethnic disparities in air pollution exposure"

of households have no access to a vehicle and these households are cut off from economic opportunity by a transportation system so heavily tilted towards the automobile. According to studies from the University of Minnesota's Accessibility Observatory, a resident of the Baltimore region can get to any job in the region in less than an hour by automobile. 100% of jobs are accessible. However, that resident would only be able to reach about 11% of the region's jobs in less than an hour by transit.

The investments proposed in this TIP will exacerbate the patterns that have left neighborhoods cut off from economic opportunity, suffering high unemployment, entrenched poverty, and disinvestment.

Unhealthy

Dr. Gaurab Basu, from the Center for Health Equity Education & Advocacy at Cambridge Health Alliance and the Department of Global Health & Social Medicine at Harvard Medical School, recently wrote: “[o]ne of the best prescriptions I could write for my patients is a clean, equitable, and sustainable transportation system. Transforming our dirty transportation system has long been an urgent public health issue. Air pollution has always made us sick; it increases the risk of heart attacks, childhood asthma exacerbations, strokes, and premature death. But COVID-19 puts an even greater impetus on us to end the use of internal combustion engines and fossil fuels.”

He went on to cite a recent Union of Concerned Scientists study⁷ which found that “communities of color breathe in, on average, 66 percent more PM_{2.5} air pollution from vehicles than white residents in the Northeast and mid-Atlantic region.” It also found that Maryland’s median PM_{2.5} concentration from on-road vehicles exceeds the regional average. A separate Harvard study has found that increased exposure to PM_{2.5} puts individuals at greater risk of dying from COVID-19⁸.

Environmentally unsustainable

Widening highways while shortchanging investment in public transportation does not meet the challenge of climate change. Last year, Marylanders drove more miles per capita than ever before, the result of adding more capacity to the public roadway network than to alternatives like buses, trains and biking. As one transportation policy expert puts it, “ceasing the continuing expansion of the highway and roads network is essential to any effort to reduce the carbon

⁷ Union of Concerned Scientists, “Inequitable Exposure to Air Pollution from Vehicles in the Northeast and Mid-Atlantic”, <https://www.ucsusa.org/sites/default/files/attach/2019/06/Inequitable-Exposure-to-Vehicle-Pollution-Northeast-Mid-Atlantic-Region.pdf>

⁸ Xiao Wu, et al, “Exposure to air pollution and COVID-19 mortality in the United States: A nationwide cross-sectional study” <https://projects.iq.harvard.edu/covid-pm/home>

footprint of transportation which is now the single largest contributor to America's greenhouse gas emissions"⁹

In October 2018 the Intergovernmental Panel on Climate Change published a 700-page report on the impacts of global warming and what it would take to reduce greenhouse gas emissions to limit warming to 1.5 degrees Celsius. To achieve this, the report states that global CO₂ emissions must decline by about 45% from 2010 levels by 2030 and reach net zero around 2050. This means we have just 10 years to drastically cut emissions if we are to mitigate the rising sea levels, droughts, and storms that result from global warming. Reducing emissions from the transportation sector will be critical to this effort and those reductions will not happen if we continue to widen highways and increase our dependence on cars.

Adding more lanes of highway will have other significant environmental consequences. Additional lane miles add impermeable surface that will increase stormwater runoff into streams, rivers, and the Chesapeake Bay. Additional lane miles and additional capacity for cars will result in increased tailpipe emissions, currently the largest source of air pollution in Maryland. Additional lane miles will encourage auto-dependent residential and business development that will result in conversion of more farmland and natural lands to land covered with asphalt and buildings.

Change is possible

The BRTB has an opportunity to change course away from these outcomes and toward a cleaner, more equitable transportation future. Many members have already expressed a desire to do so.

County Executive Olszewski has stated priorities for "building robust public transportation and infrastructure" and "promoting smarter development."¹⁰

County Executive Ball wants to "increase accessibility through a truly multi-modal transportation system" and to alleviate traffic and protect our environment "by reducing the number of cars on our roads."¹¹

County Executive Pittman recognizes the importance of the Central Maryland Regional Transit Plan and promises to "be at the forefront of transportation planning that focuses on moving people rather than cars."¹²

⁹ Yonah Freemark, "Too little, too late? A decade of transit investment in the U.S.", TransportPolitic.com, <https://www.thetransportpolitic.com/2020/01/07/too-little-too-late-a-decade-of-transit-investment-in-the-u-s/>

¹⁰ <https://www.baltimorecountymd.gov/Agencies/executive/priorities.html>

¹¹ <https://www.howardcountymd.gov/Branches/County-Executive/Reliable-and-Accessible-Infrastructure>

¹²

<https://www.capitalgazette.com/opinion/columns/ac-ce-column-steuart-pittman-20200218-ef3dhgfvkde5aapeajcdd3ki-story.html>

Mayor Buckley has said, “The future is not cars. The future is how we’re going to get around on electric scooters and bikes and things like that have less impact on the planet.”¹³

These statements represent a commitment to a cleaner, more balanced transportation future for the region. But unless you put real resources behind these sentiments, it won’t happen.

There’s an old saying that when you’re in a hole that you want to get out of, the first thing you have to do is stop digging. Well, we are in a deep transportation hole. A transit system that breaks down more often than just about every transit system in the country¹⁴. Rising commute times. Disconnected communities. Chronic poor air quality. We have to stop digging, and the way we propose to do this is to stop relentlessly adding new highway capacity projects to the TIP.

We understand that the vast majority of the highway capacity spending is on two projects already underway (the I-95 Express Toll Lane Extensions and I-695 widening), and that it may be impractical to cancel these projects. However, there are five highway capacity projects that are new to the 21-24 TIP (see Table II-2: New Projects in the 2021-2024 TIP). For some of these projects, the TIP funding only covers early design costs and full construction will cost tens of millions more in upcoming TIPs. Once a project gets into a program like this, it is harder to divert the money to other uses. We shouldn’t be starving the project pipeline for transit while adding project after project to the highway pipeline.

The new highway capacity projects only total about \$45 million. Canceling them would bring the highway capacity budget from 30.68% of the TIP budget to 29.62%. Canceling these projects is not some radical change – it’s a drop in the bucket. It’s simply putting down the shovel so the hole doesn’t get any deeper. But it is the necessary first step.

We respectfully request that you remove the five new highway capacity projects from the 21-24 TIP and redirect those funds toward projects that help to build the region many of you say you want. The funds could go to any number of worthy projects, such as:

- Addressing the \$1.5 billion backlog of deferred maintenance identified in MTA’s Capital Needs Inventory¹⁵
- Making sidewalks near bus stops and train stations compliant with the Americans with Disabilities Act

13

<https://www.baltimoresun.com/maryland/anne-arundel/annapolis/ac-cn-annapolis-bike-ride-20200702-20200702-bu4kshp4avfwjgcvh6u57uliu-story.html>

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<https://www.baltimoresun.com/politics/bs-md-pol-buses-break-down-20200307-2xie6jw3bg3bp2y27umbhiuhi-story.html>

15

https://s3.amazonaws.com/mta-website-staging/mta-website-staging/files/Transit%20Projects/Capital/201907_MDOTMTA_CNI.pdf

- Completing bike trails like the Baltimore Greenway Trails Network, the Baltimore Separated Lane Network, the Anne Arundel South Shore Trail, and the North Point Trail

2020 is a pivotal year in the United States. It is becoming more clear than ever that we cannot accept the status quo in so many areas, including health care, criminal justice, the environment, and the economy. Transportation has to be a part of that change, too. The Draft 21-24 TIP proposes to spend over \$4 billion of taxpayer money. It is up to the leaders of this region to decide whether we spend that money in ways that repair the damage caused by decades of racism, pollution, and inequity, or in ways that just keep digging a deeper hole.

Sincerely,

Baltimore Commission on Sustainability

Colin Beckman
Baltimore Penn Station MARC Riders
Group

Liz Cornish
Bikemore

Charlie Goedeke
HoCo Climate Action

Samuel Jordan
Baltimore Transit Equity Coalition

Paul Kowzan
BRTB PAC Member-Baltimore City
Resident

Brian O'Malley
Central Maryland Transportation Alliance

Cecilia Plante
Maryland Legislative Coalition

Emily Ransom
Clean Water Action

Jimmy Rouse
Transit Choices

Stewart Schwartz
Coalition for Smarter Growth

Josh Tulkin
Maryland Sierra Club

CC: Mike Kelly, BMC
Todd Lang, BMC
Regina Aris, BMC
Zach Kauffman, BMC

Jonathan Sacks
Lead, West Baltimore Project
Baltimore-Washington Transportation Research Group
BWTRG.org
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**Public Comments on TIP ID#: 90-1901-99 (SCMaglev), for the draft Maryland 2022-2025
Transportation Improvement Program (TIP)**

July 9th, 2021

To Whom It May Concern:

Please accept the following **comments on the draft Maryland 2022-2025 Transportation Improvement Program (TIP), specifically TIP ID#: 90-1901-99 (SCMAGLEV)**. The comments include the text in this document, as well as a short graphical PDF presentation of key points (appended). The comments will, in addition, refer to the key federal overview and evaluation document for the SCMaglev proposal - "Draft Environmental Impact Statement and Section 4(f) Evaluation" - as it is the only comprehensive government-sponsored evaluation of the proposal.

The Baltimore-Washington Transportation Research Group (BWTRG) - an academically-rigorous evaluation and planning organization focused specifically on the transportation options extant or proposed in the corridor between Baltimore and Washington (which is the focus of that federal EIS and 4(f), as well as many of the items in this TIF) - finds the proposed SCMaglev project to be wholly inconsistent with the widely-accepted transportation needs of both the corridor of focus, as well as the wider region. While the project "Purpose and Need" (as listed on page ES-6 of the federal EIS, and discussed throughout the document) echo our beliefs about where transportation dollars should be directed towards, it is our firm conviction that this service is the exact wrong way to go about achieving those objectives.

SCMAGLEV would represent a major misallocation of scarce transportation dollars (and even more-scarce rail dollars), a huge step backwards in the relationship between mass transportation and the environment, and in our determination, the inauguration of an immediate and potentially gargantuan, never-ending vacuum of public transportation funds. It is for these reasons, discussed in more detail below, that we urge the rejection of any funding consideration or support by the State of Maryland for this project, and instead push for the immediate funding of what we have determined to be **the "Preferred Option" for fast train service in the Baltimore-Washington corridor: Express MARC Service.**

A number of other organizations have pointed out key environmental arguments against SCMAGLEV, including: (1) the placement of the route through, and in, environmentally-sensitive land parcels; (2) the exorbitant amount of electricity necessary to run the service; (3) the unfavorable greenhouse gas emission estimates; and (4) the safety concerns of running trains that travel at such high speeds. While we echo and support those comments and concerns, we will instead focus our comments on two other critical and central concerns of the project, ones that are both environmental and fiscal in nature,

namely: (1) Who is going to ride this service? And (2) What is the cheaper, less disruptive and more sensible way to achieve the key stated objectives of the project?

The central "Purpose and Need" argument against SCMAGLEV is that **we already have a service in place capable of achieving the stated objectives**, yet this comparable service - infinitely cheaper, requiring no new construction, and utilizing existing rolling stock - remains unrealized and unfunded largely for reasons of lack of vision, lack of understanding of capabilities, and systemic racism.

To wit, we have determined that the Maryland Area Regional Commuter Train Service (MARC) of the Maryland Mass Transit Administration (MTA) could run a full express service (1 train each way per hour, Baltimore to Washington, 6am-8pm every workday) on existing tracks with existing equipment, tomorrow, if it chose to do so. We have further determined that such service could be additive to existing service, and that holes in the schedules of both Amtrak and MARC exist to be able to run this once-an-hour service on the Penn Line, as well as in the schedules and capabilities of the B&P Tunnel. We have determined that such a trip would take 29 minutes (less than one-half hour!) between Baltimore and Washington, were it to include just the recommended stations of Baltimore Penn Station, West Baltimore MARC Station, BWI Rail Station and Washington's Union Station. And lastly, and importantly, the one-way trip would be estimated to cost between \$8-10.

To repeat, MARC could run an additive service on the Penn Line with existing equipment on existing tracks tomorrow, if it chose to, and the trip time between Baltimore and Washington would be under a half hour. No new construction needed, and with a ticket price of less than \$10.

Contrast that with the MAGLEV proposal for the essentially the same stops: Washington, BWI and Baltimore. What is cataloged in the EIS and other evaluations represents what would be massive environmental and social disruption, costs requiring more than \$10 billion in taxpayer funds, tremendous on-going operating subsidies necessitated, and a one-way ticket price estimated to be up to \$60. Put simply, who is going to buy a \$60 one-way ticket from Washington to Baltimore, when they can do the same trip on MARC express for as little as \$8, with it only taking 14 minutes longer? The answer: no one. The evaluation of this project could almost stop right there.

But there are other key contradictions between this proposal and its described benefits that should be pointed out. The stated objectives of the SCMAGLEV Project are listed on page ES-6 of the federal EIS study. The first two objectives listed are:

- Improve redundancy and mobility options for transportation between the metropolitan areas of Baltimore and Washington, D.C.
- Provide connectivity to existing transportation modes in the region (e.g., heavy rail, light rail, bus, air).

Responding to the first item, again, the question is, who is going to buy that \$60 ticket for this service when \$8 tickets are available that take only 14 minutes longer, and drop the passenger in a more central location? If the answer is that very few, if any, folks are going to take that \$60 trip, then this first stated objective will not be realized. Ticket costs must be a factor of consideration for this project, and on that consideration, this MAGLEV proposal fails miserably.

Moreover, further on the subject of costs, Baltimore is not a city of relatively wealthy households. Rather it is a majority African-American city that still suffers from the on-going vestiges of redlining and

racism in housing. The accumulation of generational wealth through owned housing by African-Americans in Baltimore has been inhibited by widely-recognized mechanisms, and therefore, for that reason among others, there are significantly fewer African-American residents of Baltimore that are even capable of regularly paying \$60, or even \$30, for one-way tickets to Washington. **So to the extent that “equity” has become a key buzzword and objective in transportation planning, this project would seem to fail on that level as well.**

Finally, regarding that second stated objective of SCMAGLEV - it's connectivity benefits - again, this doesn't seem to pass the smell test. In Washington, the greatest center of connectivity, the multi-modal hub of our nation's capital, Union Station, is not where this train would end up. It would instead end up in Mt. Vernon Square, at a marginal stop on just one subway line, into which it might not even be directly connected, thereby requiring a walk out to the street to then connect into the DC Metro system. In short, connective, it is not.

And the same should be said for its two proposed Baltimore locations, one (Cherry Hill) that is nowhere near the downtown, nor near any other existing multi-modal hubs. MARC express service would therefore ultimately be a faster route to downtown Baltimore through public transportation - particularly if the Red Line Light Rail (or Subway) proposal were to be revived, for this line would directly tie into the planned future West Baltimore MARC station (again, only 29 minutes from Union Station). And the other proposed MAGLEV station, the downtown location, would require on-going massive disruption to parts of the Central Business District to implement - and again, it would not be multi-modally connective. So, as a general notion with this MAGLEV proposal, where is the connectivity? We as a transportation research organization focused on this particular corridor are unable to locate any.

As an aside, albeit a related one, it should be noted here that MARC Express Service - the infinitely cheaper, entirely more equitable and sensible alternative to SCMaglev - is not in any way included in this draft TIP, nor for that matter is it currently being proposed (at least as far as we can discern) by any organization or individual in Maryland state government, whether in transportation fields or out, except by elected leaders in Baltimore City and Anne Arundel County. Such an omission of even apparent consideration by Maryland state leaders, despite them being made aware of the tremendous possibilities of such a MARC Express Service by our organization and others in numerous conversations and presentations, can only be considered by us to be yet another example of institutional (perhaps even subconscious) racism - since such an intuitively smart, incremental service would potentially have as primary beneficiaries the communities and families in deeply-poor and African-American West Baltimore.

Instead the TIP proposes to spend billions more funding highways in the suburbs to benefit far less minority-proportioned communities - and now, with this draft TIP, it also supports a 10+ billion dollar boondoggle train, SCMaglev, that could only be afforded by the rich. Why is SCMaglev being included in the TIP, but no mention of MARC Express Service is? One could argue that leaders (both black and white) have long ago internalized the notion that those areas in West Baltimore that would be most positively affected by MARC Express, and the communities in them, are “lost causes” and therefore “good money shouldn't be thrown after bad”. We've heard that sentiment often. However, to the extent that that sentiment exists on a wider scale, we're fighting against it, as an organization committed to an equitable, transformational solution to the effects of decades of disinvestment in West Baltimore. MARC Express is a central component of that solution. Hopefully Maryland transportation leaders and planners will see fit to correct the omission of it from this key planning document.

For a discussion of MARC express service and its potentially transformational economic effects in West Baltimore, Northern Anne Arundel County and beyond, as well as on city and state budgets, please see an overview here: <https://westbaltimoreproject.org/overview>. Or for a deeper dive, see our 90-page, fully-sourced Roadmap Report here: <https://westbaltimoreproject.org/report>

And for a graphical presentation of these key arguments (and others), again, please see the appended PDF, directly below.

Thank you for your consideration.

Yours sincerely,

Jonathan Sacks
Lead,
Baltimore-Washington Transportation Research Group
West Baltimore Project

MAGLEV vs MARC EXPRESS

The Preferred Alternative

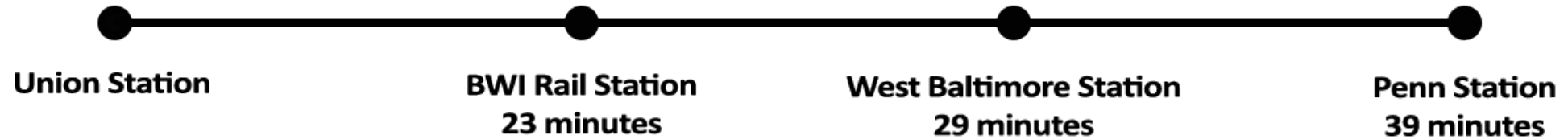
Baltimore–Washington Transportation Research Group's



West Baltimore Project

WestBaltimoreProject.org

The Alternative: MARC Express Service



The Alternative: MARC Express Service



Existing Equipment
(that MARC already owns)



Existing Tracks

MAGLEV

MARC EXPRESS

Construction

\$14 - 16 Billion

\$0

*Baltimore-Washington
Travel Time*

15 Minutes

29 Minutes

Ticket Price

\$26-60

\$8

“Who is buying a \$60 one-way ticket to Washington?”

...Certainly not anyone in Baltimore.

Yet, the stated objectives of MAGLEV are: (from the draft EIS)

The objectives of the SCMAGLEV Project are to:

- Improve redundancy and mobility options for transportation between the metropolitan areas of Baltimore and Washington, D.C.
- Provide connectivity to existing transportation modes in the region (e.g., heavy rail, light rail, bus, air).
- Provide a complementary alternative to future rail expansion opportunities on adjacent corridors.
- Support local and regional economic growth.

Connectivity... Huh?:

Proposed Stations

Direct Connection to Metro?

Mt. Vernon Square (DC)

NO

Cherry Hill (Balt)

NO

Inner Harbor (Balt)

NO

**“Meanwhile, what will (or could) a
MARC express system look like in
20 years?”**

MARC Express Line: Next 20 Years

Union Station



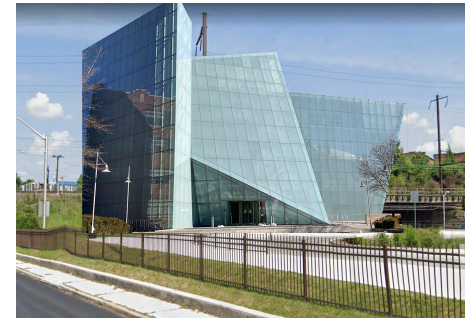
Burnham Place –
\$8 Billion Project
Finalizing EIS

BWI Rail Station
23 minutes



BWI Rail Station TOD Potential –
Northern VA-Like Possibilities,
Given Faster Travel Times to DC
Than The Arlington Corridor

West Baltimore Station
29 minutes



New W. Balt. MARC Station –
\$20 Million Station Yields Up To
\$½ Billion Positive Impact Per Year
on State and City Budgets

Penn Station
39 minutes



New Baltimore Penn Station –
\$500 Million Project
Groundbreaking This Spring

Union Station – Next 10-20 Years



- Burnham Place
- New Neighborhood Constructed on Top of the Rail Yard
- 1.5 Million Sq Ft of Office Space
- 100,000 Sq Ft of Retail
- 1,300 Residential Units
- 500 Hotel Rooms
- Fully Redesigned Union Station
- 29 Mins from Baltimore by MARC Express

Penn Station – Next 5-10 Years



- Fully Rebuilt Main Station
- Entirely New Acela Station
- \$500 million investment
- TOD Offices and Apartments
- Revitalized “Opportunity Zone”
- Construction Begins Spring 2021

BWI Rail Station – Next 10-20 Years?



- **23 Minutes to Union Station on MARC Express**
- **\$7 Tickets (Less As Monthly Pass)**
- **Travel Times to Downtown DC are Faster than NoVA's Arlington Corridor (Left)**
- **Endless TOD Potential**
- **BWI Could be Capitol Hill's Most Accessible Airport**
- **Potentially Transformational for Anne Arundel County**

WEST BALTIMORE MARC STATION - "Gateway District" Vision Document

February 2021



WEST BALTIMORE MARC STATION (track perspective)
 - conceptual rendering of new marquis, multi-modal station replacement station planned for track realignment
 - would be ~ 60,000 sq. ft. with track access on second level



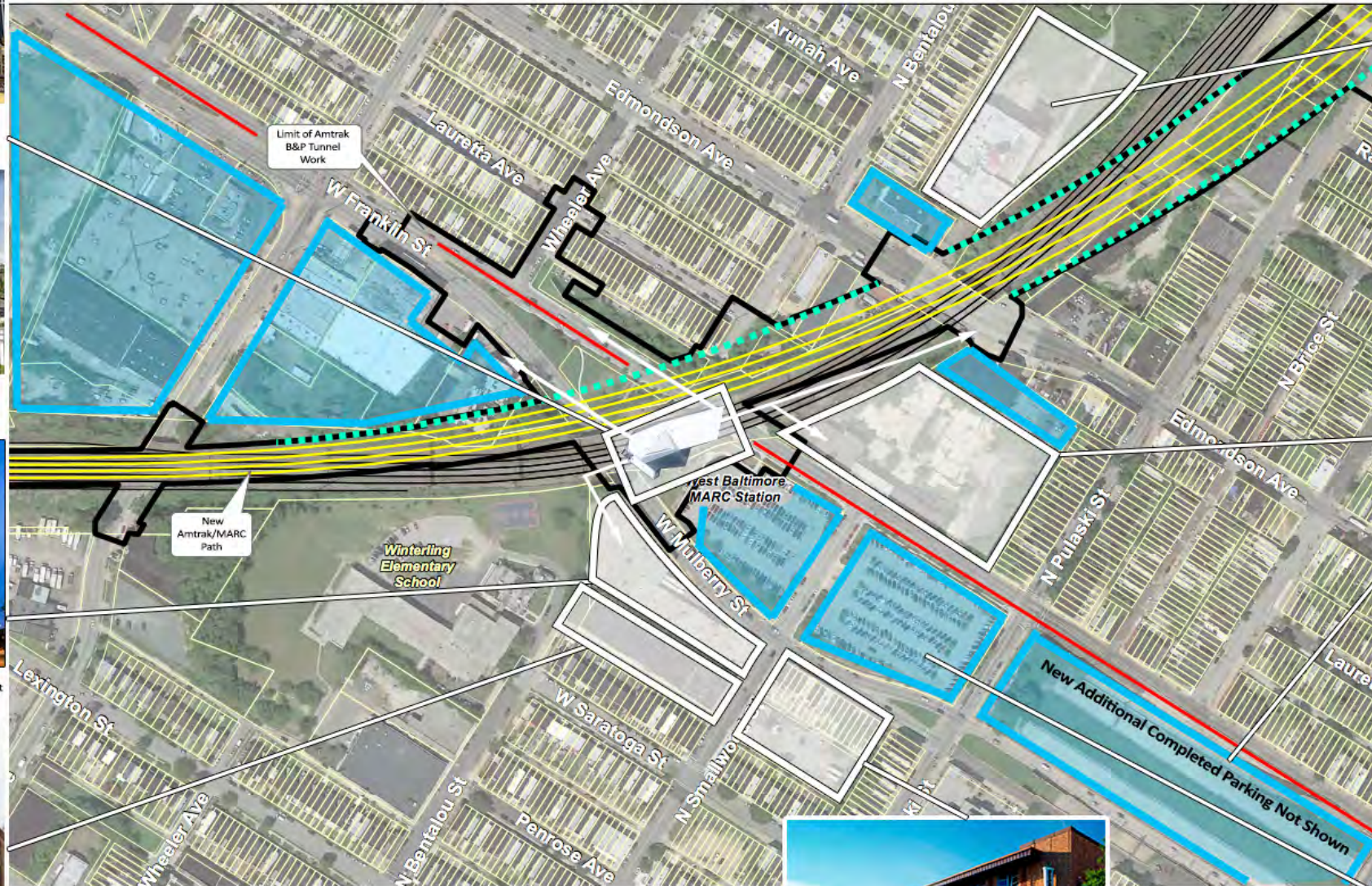
WEST BALTIMORE MARC STATION (front perspective)
 - building-only cost estimate: \$17 million
 - \$94 million currently budgeted for station and track
 - presumed funding with B&P tunnel replacement



THE MARSHALL
 - conceptual rendering of massive TOD condo/retail development
 - 60,000 sq. ft. pad available directly adjacent to station
 - connected to station by pedestrian walkway over Mulberry St.



THE MENCKEN
 - conceptual rendering of mid-rise TOD condo/retail development



- Key Focus Parcels
- Additional Parcels Potentially Available for Transit-Oriented Development
- Planned Baltimore Metro Red Line (Subway Preferred)
- Amtrak Sound Wall (To Be Constructed As Part Of B&P Tunnel Project)
- Walkways from Station



GROCERY STORE
 - conceptual location for large-lot grocery store
 - Mulberry St. frontage
 - quieter neighborhood side and rear
 - rear parking



SIMON STUDIOS
 - conceptual location for television and film soundstages
 - iconic Ward Bakery building and large industrial lot available



AMERICAN ICE FACTORY
 - walkway on bridge across Franklin St. directly to venue
 - walkway will also continue to Edmondson Av.
 - historic tax credits awarded



PARKWAY CORSO
 - conceptual reference for TOD parking lots
 - mixed-use with promenade connecting station with new park



GATEWAY CENTER
 - conceptual reference for TOD parcel on station parking lots
 - condominiums on top, commercial/retail underneath

W. Balt. MARC Station – Next 5-10 Years?



Conceptual Reference for a Modern, Multi-Modal Station

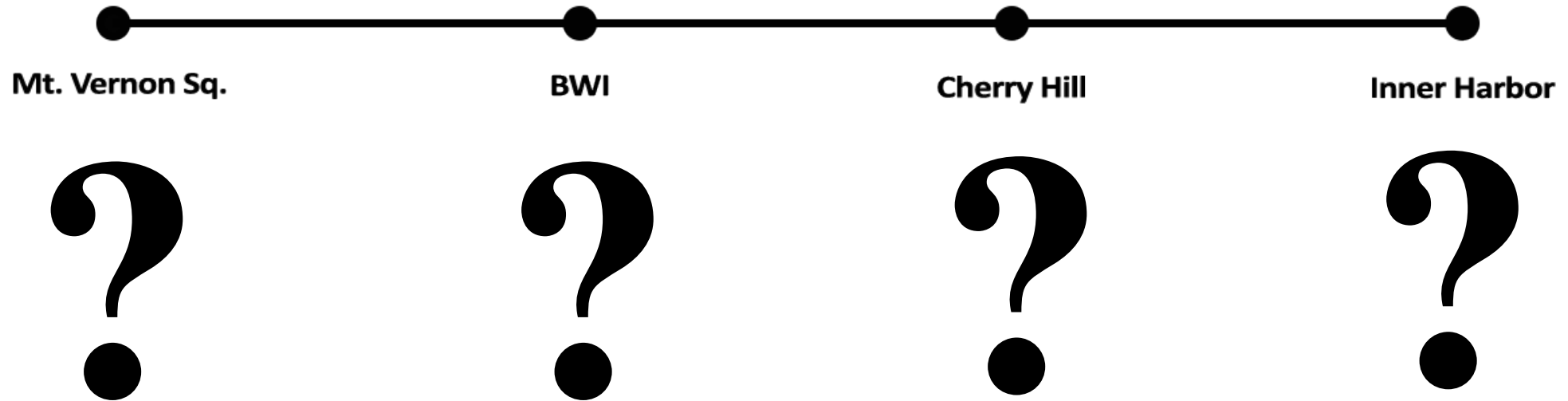
- **Station Developed as Part of B&P Tunnel Construction**
- **B&P is Top Amtrak Priority; Likely Funded This Year**
- **State of MD Has Budgeted \$94 Million for Work**
- **Station Would Cost Roughly \$20 Million**

- **New Marquis Multi-Modal Modern Showcase**
- **Landmark Centerpiece for the Neighborhood and Commuters**
- **An Equally Welcoming Beacon at Night**
- **Red Line Subway Would Directly Tie In**



Conceptual Reference for a Modern, Multi-Modal Station

MAGLEV: Next 20 Years?



- How does it connect to Metro?
- Where is parking?
- “Character of Mt Vernon Square will be permanently changed.... Substantial construction and long-term operational implications on nearby properties” – *Head of DC Dept of Planning*

- Where’s the station going to end up?
- How many properties and environmental sites will be impacted?
- Who is going to pay \$40 for an airport ticket, when MARC express gets you there 10 minutes later and \$33 cheaper?

- Having a station here defeats the whole purpose - and competitive advantage - of inter-city public transportation – to go from downtown to downtown.
- How many properties and environmental sites will be impacted?

- If the station is here, Baltimore may not even be included in the DC-NY 1-hr trip. Instead it will be some sort of “local” train.
- Historic Fallon Building federal courthouse likely to be demolished – for a parking lot.

What about equity?

How can our Federal Government give \$10 Billion in subsidies to a consortium for a train that only the rich can afford, while economically-challenged West Baltimore can't even get a pilot MARC express service to Washington from their station - even though that service would cost next-to-nothing and bring the potential for transformational revitalization and hundreds of millions per year in added income and savings to city and state coffers?

What's a Better Way to Use \$10 billion?

Fund Two Additional Subway Lines in Baltimore

(to finally make an actual system)

Pay Down 75% of MTA's State of Good Repair Needs

(MTA needs >\$13 billion through 2045)

Fund "BWI Platform & 4th Track Project" AND 9 Similar Ones

(creating huge capacity increases on NEC and Penn Line,
and cutting DC-NY Acela travel times significantly)

MAGLEV is Maryland's Monorail **fail**

IMAGE REDACTED

FOR COPYRIGHT

PUBLIC COMMENTS

2022-2025 TRANSPORTATION IMPROVEMENT PROGRAM

Social Media Comments

Twitter, @BaltoMetroCo

shayna @shaynuttt 5 days ago

.@BaltoMetroCo Going through the TIP projects in Baltimore City and seeing a lot of highway/roadway preservation work. I want to remind you that we have a Complete Streets ordinance. New construction must have all ages and abilities provisions for peds, bikes, and transit.

shayna @shaynuttt 5 days ago

.@BaltoMetroCo also you have the maglev starting from Penn Station. It should be from Camden Yards.

In reply to shaynuttt and 1 more

Brian Seel @cylussecc 5 days ago · Baltimore

Lol... I just forwarded them my same comments from last year. They ignored them then, and I don't feel like putting in the effort again.

7

[Hide Conversation](#)

shayna .@BaltoMetroCo 5d

Going through the TIP projects in Baltimore City and seeing a lot of highway/roadway preservation work. I want to remind you that we...

[Read more](#)

PUBLIC COMMENTS

 In reply to cylussec and 1 more



shayna @shaynuttt

● 5 days ago

they didn't ignore them - the way the TIP works is that DOT has to submit projects. We don't have a comprehensive transportation plan and so this is kind of hard for us.



 [Hide Conversation](#)




Brian Seel Lol... I just forwarded them my same comments from last year. They ignored them then, and I don't feel like putting in the effort again.

5d











PUBLIC COMMENTS


In reply to cylussec and 1 more

 **shayna** @shaynuttt
5 days ago

also, BMC doesn't make these plans. they consolidate what counties/the state submits.


    2   

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





 **shayna** they didn't ignore them - the way the TIP works is that DOT has to submit projects. We don't have a comprehensive transportation plan and so this is... 5d


[Read more](#)


In reply to shaynuttt and 2 more

 **Graham Projects**
@grahamprojects
5 days ago

Tell them we need East West choo choo

   1  4   

 [Hide Conversation](#)

 **shayna** also, BMC doesn't make these plans. they consolidate what counties/the state submits. 5d

PUBLIC COMMENTS

2022-2025 TRANSPORTATION IMPROVEMENT PROGRAM

Social Media Comments

 **Eli Pousson** @elipousson
4 days ago

As a snapshot of regional transportation priorities the TIP 2022-2025 projects under consideration by the @BaltoMetroCo are terrible.

There are only *two* projects in the "Emission Reduction Strategy" category (renamed bike/ped facilities by me for this plot).

shayna @shaynuttt
.@BaltoMetroCo Going through the TIP projects in Baltimore City and seeing a lot of highway/roadway preservation work. I want to remind you that we...

[Read more](#)

 In reply to shaynuttt and 1 more

 **Jed Weeks** @jedweeks
4 days ago · Baltimore

When we began to challenge the status quo on the Public Advisory Committee their solution was to stop having the Public Advisory Committee.

   1  10  

 [Hide Conversation](#)

 **shayna** .@BaltoMetroCo 5d
Going through the TIP projects in Baltimore City and seeing a lot of highway/roadway preservation work. I want to remind you that we...

PUBLIC COMMENTS

2022-2025 TRANSPORTATION IMPROVEMENT PROGRAM INTERACTIVE MAP

7/6/2021 19:26

Myles Muehlberger

m.r.muehlberger@gmail.com

21207

Increasing vehicular lanes along the inner loop of 695 would only serve to create more vehicular traffic. This phenomenon is known as “induced traffic demand” and is well documented and proven to occur. As a current driver of this route for work, I strongly oppose the additional lane proposal. Instead the proposed space for the lane and some existing lanes should be used to create a rail and/or trail system. We are far past the time to continue focusing travel on automobiles rather than public transit. A rail and trail system would provide greater opportunity for all residents in the area, especially those who are people of color and lower income, the primary residents within the area inside the beltway, to travel to destinations as needed. It would also provide sustainable reuse of the highway space as Baltimore County, Maryland, the US, and the world need to move away from automobile infrastructure that contributes to global warming.

63-1802-41 SHA Baltimore County I-695: I-70 to MD 43

6/17/2021 21:21

Daniel Paschall

daniel@greenway.org

19121

Important project for the Baltimore Greenway Trails Network and the East Coast Greenway

12-2102-03 Baltimore City Baltimore City Greenway Middle Branch Phase 2

7/7/2021 20:56

Robert Waldman

roberthwaldman@gmail.com

21401

Without the opportunity to give it much thought, take my comment for what you think is its worth. The Sears site at the Annapolis Mall is maybe adequately situated at Route 650 and ramps to/from I 97, and there is public transit already, and there is parking. But it is removed from the bulk of the population of Annapolis, which is closer to Parole. I suggest a presentation to the Planning Commission of Annapolis as to your thinking. Please contact Dr. Sally Nash, Dir of Planning & Zoning, City of Annapolis.

11-2101-66 Anne Arundel County Anne Arundel County Parole Transportation Center

7/7/2021 21:01

Robert Waldman

roberthwaldman@gmail.com

21401

21401

This is the first I have heard of this nearly \$2M project, and I am not only on the Annapolis Planning Commission but also am the Chairman of the local community association. I would appreciate, and would collaborate with, a presentation (even by Zoom) to the local community and another to the Planning Commission. You may contact me as to both. I am concerned that this project may miss stormwater benefits and that the community knows nothing about it. Thank you. RHW

11-1601-19 Anne Arundel County Anne Arundel County McKendree Road Culvert over Lyons Creek