

IN REPLY REFER TO:
NCPC File No. 7850

December 23, 2016

SCMAGLEV Project
c/o Mr. Bradley M. Smith
Maryland Department of Transportation
7201 Corporate Center Drive
Hanover, Maryland, 21076

Re: Baltimore-Washington Superconducting Maglev (SCMAGLEV) Project Scoping Comments

Dear Mr. Smith:

Thank you for inviting the National Capital Planning Commission (NCPC) to participate as a cooperating agency for the Baltimore-Washington Superconducting Maglev (SCMAGLEV) Project (Project). I am writing to provide comments on the Federal Railroad Administration's notice of intent to prepare an Environmental Impact Statement for this Project, jointly with the Maryland Department of Transportation. The Project consists of the construction and operation of a high-speed magnetic levitation train system between Washington, DC and Baltimore, MD with an intermediate stop at Baltimore/Washington International Thurgood Marshall (BWI) Airport.

The comments provided below are based on the NCPC's role as the central planning agency for the federal government in the National Capital Region (NCR). In general, NCPC authority includes approval of site development and building plans on federal lands (40 U.S.C. Section 8722(b)(1) and (d)), and approvals of certain sales or transfers of jurisdiction within the District of Columbia (DC). Thus, any section crossing federal lands requires NCPC review.

NCPC reviews certain zoning decisions and developments in DC, including those within the Washington Union Station North (USN) zone. NCPC is a cooperating agency on infrastructure projects, including the DC Streetcar and the Washington Union Station Expansion. NCPC reviews proposed changes to existing park plans within the study area; the Capper-Cramton Act (46 Stat. 482) specifically addresses stream valley parks. The Federal Highway Administration Section 4(f) de minimis provisions do not supersede other federal laws over parkland such as the Capper-Cramton Act. Additionally, NCPC retains advisory review over projects that impact federal property within Prince George's County.

In general, staff supports the Project purpose, which appears to be consistent with the *Comprehensive Plan for the National Capital: Federal Elements* (Comprehensive Plan). Prepared by NCPC, the Comprehensive Plan provides a policy framework for the federal government in managing its operations and activity in the National Capital Region. Environmental documentation for the Project should adequately and appropriately identify and address the Comprehensive Plan; particularly the topics enumerated below.

Transportation

Federal government operations rely on a robust transportation network and solutions to ensure region-wide mobility. The Project study area encompasses many important federal employment facilities. We particularly encourage you to coordinate with the Architect of the Capitol and General Services Administration, the latter of whom administers many of the federal facilities within the study area.

NCPC has developed several rail transportation initiatives that could inform the Project and which may be referenced through our website at: www.ncpc.gov. Our *Freight Railroad Realignment Feasibility Study* explored several alternatives to efficiently and securely transport rail and cargo to and through the NCR. Additionally, our *Southwest Ecodistrict Plan* envisions a second regional intermodal hub approximately one mile south of Union Station at L'Enfant Plaza Station.

We also encourage close coordination with other transit initiatives linked to rail corridors along the East Coast. NCPC's comments on these initiatives can be referenced through our website.

- The *NEC FUTURE Project* is determining a long-term vision and investment program for the Northeast Corridor, specifically evaluating steel-wheel technologies.
- The *Washington Union Station Expansion Project* is a major effort to expand and modernize DC's primary train station.
- The *Long Bridge Study* is an important District Department of Transportation (DDOT) project exploring how to replace and potentially expand the Potomac River rail crossing.
- The *DC2RI1 Project* is studying how to provide a competitive transportation choice between the Long Bridge and Richmond, VA by increasing intercity passenger rail capacity and improving travel times, as part of the *Southeast High Speed Rail Corridor* program extending to Atlanta, GA.
- Washington Metropolitan Transit Authority (WMTA), which operates the nation's second largest heavy rail system recently developed *Momentum*, a long term vision for the future of regional bus and rail transit in the NCR. Passenger volume at Union Station, WMTA's busiest station, is expected to significantly grow.
- DDOT's *DC Streetcar Project* will provide a new surface rail transit connection to Union Station.

The Project is in a rapidly growing area of the region and crosses many important roadways. Union Station, the central hub for rail transportation in Washington DC, supports substantial vehicular, rail, bicycle and pedestrian traffic. The proposed project may have an impact on these systems, both during construction, as well as after completion. As such, NCPC requests that the environmental document analyze short and long term impacts to pedestrian, bicycle and vehicular circulation, including access and safety.

Historic and Cultural Resources

NCPC staff is interested in the impact of the proposed project on Union Station and the Plan for the City of Washington (including both the La'Enfant Plan and McMillan Plan).

The Project proposes Washington Union Station as a terminal station. Completed in 1908, Union Station was designed by Daniel Burnham, one of America's most noted architects. The station is described in the U.S. Senate Commission's McMillan Plan as "the grand gateway to the capital;" the style of which "should be equally as dignified as that of the public buildings themselves." It was placed on the National Register of Historic Places in 1969. In 1979, the National Register designation was expanded to include the Columbus Fountain and Plaza located in front of the station.

The Union Station area, located at the geographic core of the 1792 La'Enfant Plan, is a very sensitive historic setting. The La'Enfant Plan, which was Commissioned by George Washington, provided the capital city's arrangement of streets and public spaces. Building on the La'Enfant Plan, the 1901 McMillan Plan located Washington's Union Station at a site just north of the US Capitol Building, supporting Senate office buildings, the National Mall, and DC's historic post office building which now hosts the Smithsonian Postal Museum.

The physical and visual connection between Union Station and the U.S. Capitol is a key aspect of the Plan for the City of Washington and are part of the defining character of this area of the city. The Union Station site is at the confluence of historic streets, including Massachusetts, Louisiana and Delaware Avenues, NE. A primary vista to the U.S. Capitol, North Capitol Street, extends a block west of the station site.

The Project study area encompasses additional La'Enfant corridors, including Florida Avenue and East and South Capitol Streets. Other resources in the study area include historic districts, cultural landscapes, and commemorative works.

Recognizing that the proposed project has the potential to affect historic properties and the character of this area, staff specifically requests that following resource topics be analyzed in the EIS:

- Impacts to contributing viewsheds in the vicinity of Union Station, such as Louisiana, Delaware, and Florida Avenues.
- Impacts to historic properties in the vicinity of Union Station, including but not limited to, the US Capitol and Capitol Grounds, Union Station, the Russell Senate Office Building, and Federal Home Loan Bank Board Building.

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Parks and Open Space

The Project study area encompasses several large park and open spaces, including the U.S. Fish and Wildlife Service's Patuxent Wildlife Refuge and the National Park Service's Brentwood Maintenance Facility, Anacostia Park, Fort Lincoln and Kenilworth Aquatic Gardens. Stream Valleys subject to Capper-Cramton Act authorities include the Northeast Branch, Northwest Branch, and Paint Branch. Coordinate with the respective land steward agencies to examine federal interests, including the preservation and enhancement of the NCR's natural and historic areas. The EIS should evaluate potential impacts from station and infrastructure design on both the historic, natural and cultural resources, and the visitor's experience to them. We particularly encourage you to coordinate with the US Fish and Wildlife Service and the National Park Service.

Environment

The study area crosses several major watersheds: Anacostia River, Patuxent River, and Western Branch. The Comprehensive Plan's environmental element provides development guidelines, including water-quality, tree replacement, and wildlife preservation policies that should be used to help guide the project's future planning and design. Every effort should be made to avoid construction in the floodplain (100 and 500-year); to remove trees in excess of the number of new trees planted as mitigation; and to avoid sensitive ecological and wildlife areas along the corridor. We request that several environmental topics be analyzed in the EIS. These include:

- Changes in air, light and noise pollution
- Changes in vegetation and tree canopy
- Stormwater runoff and management, including both federal and local requirements
- Impervious surfaces
- Energy use
- Short term impacts from construction

We look forward to working on this Project with federal and state partners to improve access to the National Capital Region. If you have any questions regarding our comments, plans/policies, or our project submission requirements, please refer to our Agency website. Also, please use Mr. Kael Anderson as the point of contact for the project at 202-482-7273 or kael.anderson@nrc.gov.

Sincerely,



Michael Sherman
Director, Policy and Research Division

cc: Peter May, National Park Service
Mina Wright, General Services Administration
Stephen Ayers, Architect of the Capitol
Beverly Swain-Staley, Union Station Redevelopment Corporation