

MARYLAND ORNITHOLOGICAL SOCIETY, INC.



Reply to:

November 10, 2023

Danielle Spendiff, Regulatory and Customer Service Division Chief
Wetlands and Waterways Protection Program
Water and Science Administration
Maryland Department of the Environment
1800 Washington Boulevard, Suite 430
Baltimore, MD 21230

RECEIVED

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WATER AND SCIENCE ADMIN.
REGULATORY SERVICES COORD.

Re: Comments on the BWRR Water Quality Certification Application for the Baltimore-Washington SCMaglev
[Expanded version of email sent November 8, 2023]

Dear Ms. Spendiff,

The Maryland Ornithological Society (MOS) appreciates the chance to comment on the proposed issuance of a Water Quality Certification (WQC) for the SCMaglev project. For the two major reasons given below, we strongly oppose any issuance of such a permit.

1. No Benefit to Local People but Lower Quality of Life
Granting a WQC for the project (and thereby allowing it to proceed) would result in negative impacts on three Tier II quality streams (Beaverdam Creek I & II and the Patuxent River). The Baltimore-Washington Rapid Rail (BWRR) group freely admits this but attempts to justify the project by touting the supposed benefits to the local communities. But local people would not benefit from the service for the following reasons:
 - i) Maglev would be more expensive than the existing alternatives: namely MARC and Amtrak,
 - ii) it would only have three stops; quite insufficient for a commuter service and,
 - iii) finally Maglev would result in lower quality of life for local people owing to permanent loss of green space and several years of heavy construction traffic, and all this for a service that seems designed only for the well off.
2. Adverse Environmental Impact
Granting a WQC (and thereby allowing Maglev to be built) would harm the area's birdlife, forest lands and destroy parts of the most intensively studied area of the US. Specifically, Maglev construction and operation would impact nearby aquatic habitats, most notably Beaverdam Creek. This is a Tier II stream with good water quality that supports spawning anadromous fish, including river herring and

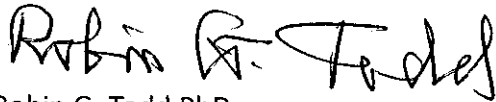
alewife. These fish support a wide variety of bird life, including several species of heron, Bald Eagles and Osprey, and Mergansers (fish-eating ducks). Beaverdam Creek is also used in winter by a wide variety of waterfowl that feed on aquatic vegetation, and is also the site of an active Bald Eagle nest.

More than 100 years of research have made the Beltsville Agricultural Research Center (BARC) and Patuxent Research Refuge (PRR) among the most biologically intensely-studied landscapes in the whole world. The long term predictive value of the data generated from these areas would be greatly reduced by the degradative impacts of Maglev.

MOS is a statewide, nonprofit organization established in 1945 and is devoted to the study, conservation and enjoyment of wild birds. Currently we have 15 chapters and approximately 2,000 members, all of whom are volunteers. Our website can be reached at MDBirds.org.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Robin G. Todd". The signature is written in a cursive, flowing style.

Robin G. Todd PhD
MOS Conservation Committee Chair
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Ellicott City, MD 21042
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