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Saving a National Treasure

August 1, 2022

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Maryland Transit Administration
6 St. Paul St.
Baltimore, MD 21202
Attn: Regional Transit Plan (RTP) Corridor Team

SENT VIA EMAIL TO rtp@mta.maryland.gov

**RE: Feedback on Alternatives presented for public review
East-West Corridor Study**

The Chesapeake Bay Foundation submits the comments below in response to MDOT MTA's request for public feedback on the [East-West Corridor Study](#). We appreciate MTA's attention to transit inequities in the Baltimore region and urge the Agency to incorporate the Red Line into current planning efforts.

The project selection process must be responsive, accountable, and complete.

Community members and officials worked for over a decade to plan and assess the environmental and financial impacts of the Red Line, as well as secure almost one billion dollars in federal funding. The plan centered around transit-oriented development, which would have brought economic and health benefits to the region. The cancellation of the project was viewed as unjust, frustrating, and deeply hurtful to many members of communities impacted by this decision. The East-West Corridor Study largely bypasses the tremendous amount of work that residents and officials put into the Red Line. By failing to include a demonstrably buildable option and seeking community feedback only on alternatives that the community previously stated it did not want, MTA is shortchanging the study and the community. Advancing a study without the Red Line included is less than what community members asked for and deserve.

Trains are more effective than buses at reducing systemic inequities.

Public transit reduces pollution that would otherwise damage our health, our climate, and our waterways. Automobiles emit particulates that can cause or worsen asthma and other diseases. Chemical compounds such as nitrous oxides are also deposited into waterways, degrading water quality. Fully one-third of the nitrogen pollution in tidal Chesapeake Bay rivers like the Patapsco comes from the

air – with vehicles a major contributor. Baltimore’s East-West Corridor, which includes a number of lower income and minority-majority neighborhoods, is faced with levels of these pollutants in the 80th to 100th percentile due in part to the concentration of auto travel and lack of cleaner transportation mode choices along this route.¹ Meanwhile, residents can struggle with the high cost of owning and maintaining a personal vehicle. As a result, these communities end up burdened with the environmental impact of regional travel patterns without an equitable level of access to workplaces, grocery stores, schools, and natural areas.

Maryland has committed to cut nitrogen pollution by 15% within the next five years and achieve net zero emissions of greenhouse gases by 2045. We applaud efforts to reduce overall greenhouse gas emissions, air pollution, and traffic congestion, as these have negative effects on the health of Maryland’s residents and ecosystems, and front-line communities bear an unfair proportion of the resulting environmental harms.

Although CBF is largely supportive of public transportation options, not all options are equal in value and benefits. Providing accessible and affordable rail transit would help reduce auto dependence and its associated pollution burden. Fixed-rail systems like the City’s Metro and light rail services represent a more lasting commitment to clean and equitable transportation access than buses, enabling residents to live healthier lives and businesses to invest in their communities with confidence. Research from the Victoria Transport Policy Institute shows that “regions with urban rail systems tend to have the highest transit mode shares and the lowest household transportation spending, representing thousands of dollars in annual savings for an average household.”² Past MTA practice has shown that bus lines can and will be rerouted over time, potentially decreasing service and leaving residents with fewer choices, higher household costs, and untenably longer trips.

Five of the seven alternatives proposed in the East-West Corridor Study are comprised entirely of or incorporate Bus Rapid Transit (BRT). While Bus Rapid Transit can be faster to build, BRT cannot anchor an effective transit system. The safest investment for businesses, residents, and neighborhood well-being is Light Rail. The infrastructure of Light Rail is built for long-term use, and the longevity of rail cars is approximately 50 years³, compared to BRT’s average lifespan of 12⁴ years. Furthermore, light rail gains nearly twice as many passenger miles per gasoline-gallon equivalent than buses.⁵ Therefore, both the cost-effectiveness and environmental impact of light rail is better when compared to buses.

The Red Line would best deliver desired community and project outcomes.

¹ EPA. [EJSCREEN: EJ Indexes for Particulate Matter 2.5, Ozone, and Diesel PM](#). Accessed 7/28/22.

² Littman, Todd (VTPI). [Evaluating Public Transit Benefits and Costs: Best Practices Guidebook](#). 11 July 2022.

³ Gulcimen, Sedat, et al. “Life Cycle Sustainability Assessment of a Light Rail Transit System: Integration of Environmental, Economic, and Social Impacts.” *Society of Environmental Toxicology and Chemistry*, 16 Apr. 2021, <https://setac.onlinelibrary.wiley.com/doi/10.1002/ieam.4428>.

⁴ Feller, Gordon. “Automated Bus Rapid Transit: The Future of Urban Transit Is Here.” *Metro Magazine*, Metro Magazine, 8 July 2021, <https://www.metro-magazine.com/10146448/automated-bus-rapid-transit-the-future-of-urban-transit-is-here>.

⁵ US Department of Energy, Alternative Fuels Data Center. [Average Per-Passenger Fuel Economy, by travel mode](#). Accessed 7/29/22.

Chesapeake Bay Foundation believes that best use of resources is to revive the discussion and implementation on the Red Line; MTA had it right the first time. Revisiting the Red Line's environmental impact study with the U.S. Department of Transportation is the best next step, as this plan was approved with significant community feedback and scored highly enough to secure federal funding.

In the alternatives provided in the East-West Corridor Study, we believe Alternative #6 most closely resembles the community's requests for the Red Line. We urge MTA to prioritize such an alternative for superior longevity and high ridership potentials. This investment in a more equitable transportation system will help secure community health, wealth, and clean water for generations to come.

We thank you for your time and consideration. For any questions, please do not hesitate to contact me at 410.268.8816 or by email at jkurtz@cbf.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Kurtz".

Josh Kurtz
Maryland Executive Director