



Citizens Advisory Council

2013 ANNUAL REPORT



TABLE OF CONTENTS

<u>SECTION</u>	<u>SUBJECT</u>	<u>PAGE(S)</u>
I	Red Line Citizens' Advisory Council	3
II	Executive Summary	4 - 5
III	MTA Red Line Planning Update	6 - 7
Appendix A	CAC Meetings/Dates/Locations/	8 - 11
Appendix B	Financial Report	12
Appendix C	Mission of Red Line CAC	13 - 14
Appendix D	Analysis of Red Line Criteria	15 - 18
Appendix E	MTA Red Line Planning Process	19 - 22
Appendix F	Community Responses	23 - 38

I THE 2013 RED LINE CITIZENS' ADVISORY COUNCIL

The Maryland General Assembly created the Red Line Citizens' Advisory council in 2006 (HB 1309/SB873), which requires that the members of the CAC be selected by the President of the Senate, the Speaker of the House, Baltimore Mayor, Baltimore County Executive and the Governor or, at the Governor's discretion, the Maryland Transit Administrator. This statute also requires the Maryland Transit Administrator to designate two co-chairs of the Advisory Council by selecting one from a list of two names provided by the President of the Senate, and one from a list of two names provided by the Speaker of the House.

Dr. Rodney Orange
Co-Chair
Executive Committee
Baltimore City Branch NAACP

Ms. Angela Bethea-Spearman
Co-Chair
President, Uplands Community Assoc.
Chair, S. W. Development. Committee

Mr. Edward Cohen
Transit Riders Action Council of
Metropolitan Baltimore

Ms. Sandra E. Conner
Director, Workforce Transportation and Referral,
Sojourner-Douglass College

Mr. Christopher Costello
Baltimore City Resident:
West Gate Community

Mr. Michael Dickson
Greater West Hills Community Association

Mr. Jason Filippou (RESIGNED)
Executive Director,
Greektown Community Development Corp.

Ms. Laurie Feinberg
Baltimore City Department of Planning

Mr. Emery Hines
Senior Transportation Officer
Baltimore County Department of Public Works

Ms. Brooke Lierman, Esq. (RESIGNED)
Secretary
Fells Point Residents Assoc.

Mr. George Moniodis
Greektown Development Corp

Ms. Annie Williams (MEDICAL LEAVE)
President, Harlem Park
Neighborhood Council, Inc.

Ms. Barbara Zektick
Baltimore City Transportation Dept

VACANT POSITIONS:
Baltimore County
Canton

The enabling legislation indicated above, specified that the Council should include 15 members representing areas in the Red Line corridor and appointees from specific government agencies. When the Council filed its 2012 Report, Council membership included the required 15 members; however, membership has declined to 10 active positions because appointments are still in progress for four Council Positions where the members have resigned and one member was is on extended medical leave of absence. The appointing authority is as follows: Five members are to be appointed by the President of the Senate, and five members are to be appointed by the Speaker of the House of Delegates. These 10 members must be business owners, residents, service providers, or workers in the Red Line corridor and are to be appointed in consultation with the members of the Baltimore City Delegation of the General Assembly that represent Legislative Districts 41, 44, and 46, and the members of the Baltimore County Delegation that represent Legislative District 10. Of the remaining five members, two are to be appointed by the Governor, or at the Governor's discretion, the Maryland Transit Administrator; two are to be appointed by the Mayor of Baltimore City to represent the Departments of Planning and Transportation; and one is to be appointed by the County Executive of Baltimore County. Members do not receive compensation. MTA provides staff the council with staff assistance.

II EXECUTIVE SUMMARY

The members of the Red Line Citizens Advisory Council (CAC) have reviewed the information provided at our meetings and otherwise available to date regarding the planning for the proposed “Red Line” and have prepared the following comments in line with the preamble and legislative requirements contained in the authorizing legislation: Baltimore Corridor Transit Study – Red Line - Requirements and Citizens’ Advisory Council” (2006 HB 1309/SB873).

This report is intended to provide state and local elected officials with a community view and evaluation of the Red Line planning process. In addition, it contains responses from the public to the issues identified in the authorizing legislation, as well as suggestions for improving the planning process in the future.

Red Line CAC is grateful for the support provided by the Maryland Transit Administration in the conduct of meetings and activities over the past year. The assistance of Carmen Morosan, Baltimore City Department of Planning, has been essential in the organization of the Report and validation of data. The CAC also wishes to recognize the Mayor of Baltimore and the City Department of Transportation’s Red Line Coordinator, Danyell Diggs, for their ongoing support for the Red Line.

During the past year, the Red Line Citizens’ Advisory Council (CAC) met in alternate months in locations along the proposed Red Line alignment. Meeting dates, location and topics of discussions for these meetings can be found in Appendix A. The associated minutes for each meeting can be found on the Maryland Transit Administration’s (MTA) website, mta.maryland.gov/transit-projects. However, the primary purpose of these meetings was to receive and review information, via presentations, and/or print media regarding the planning for the proposed Red Line project, to determine whether the implementation plans will comply with following criteria:

1. Provide compensation for property owners whose property is damaged during the construction of any Red Line project, redevelopment of commercial areas surrounding the Red Line transit corridor in Baltimore City and Baltimore County; and providing hiring preferences to residents of legislative districts in which the Red Line transit project will be constructed or to residents of legislative districts adjacent to those in which the Red Line transit project will be constructed.
2. Consider a full range of construction alternatives, including an underground rail option.
3. Ensure that the Red Line project:
 - a) Benefits the communities through which it will travel;
 - b) uses an inclusive planning process, including consultation with community residents, businesses, and institutions in the corridor;
 - c) is planned to maximize the likelihood that federal funding will be obtained for the project;
 - d) includes, during its planning phase, the distribution of factual information that allows the community to compare the costs, benefits, and impacts of all construction alternatives;
 - e) favors alignments that produce the least negative community impacts practicable; and
 - f) places a priority on maintaining the Study schedule
4. Enhance communication of information to communities regarding the planning, engineering, and construction process.

Topics covered during the 2012 -2013 CAC meetings included:

architectural concepts for underground stations; Baltimore City workforce initiatives; environmental mitigation; ongoing efforts by the community liaison staff; Federal Environmental Impact Statement (FEIS); public outreach efforts; public art to be incorporated into the station designs; right-of-way acquisition; station design, tunnel safety; structural assessments for the tunnels.

The delivery of the 2011 – 2012 Annual Report was delayed until January 2013 to accommodate changes to the format.

For additional information including future meeting of the Red Line Citizens’ Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

II EXECUTIVE SUMMARY (Contd.)

CAC Subcommittees meet on the second Thursday in the interim months, when the CAC does not hold public meetings. Subcommittee meetings are intended to plan the agenda and content for future public meetings.

The Subcommittee minutes, public meeting agendas and minutes, as well as any reports are attached. Subcommittee reports are located in Appendix A. The Subcommittee members are appointed as follows:

Annual Report Subcommittee:

Christopher Costello, Chair
Gary Cole/ Laurie Feinberg, Co-chair
Edward Cohen
Sandra Conner
Michael Dickson

Construction and Operation Impacts and Mitigation Subcommittee:

Emery Hines, Chair
Barbara Zektic, Co-chair
Edward Cohen
Christopher Costello
Dr. Rodney Orange

Economic Empowerment Subcommittee:

Sandra Conner, Chair
Gary Cole/Laurie Feinberg, Co-chair
Michael Dickson
2 VACANT POSITIONS

Neighborhood and Community Development Subcommittee:

George Moniodis, Chair
Angela Bethea-Spearman, Co-chair
3 VACANT POSITIONS

Public meetings are held beginning at 7:00 pm on the 2nd Thursday of the following months: September, November, January, March, May and July. Attendance at CAC meetings, including subcommittee meetings and other public forums are key to overall success of the CAC ability to fulfill its mission. The below chart summarizing the FY 2012-2013 attendance at public meetings by CAC members is located in Appendix A.

RESOLUTIONS

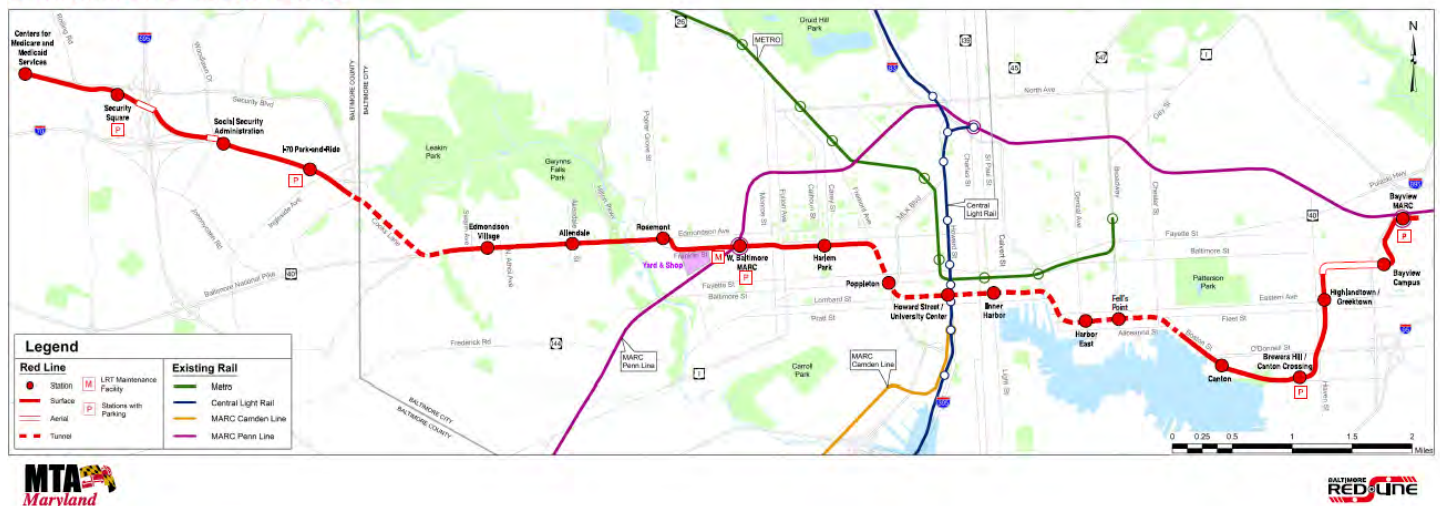
During the 2013 Session of the Maryland General Assembly, the CAC members voted to support an increase in transportation funding. A copy of this resolution is located in Appendix A.

III MTA RED LINE PLANNING UPDATE

A description of the development of the Red Line Project as planned by MTA

The proposed Red Line is an east-west transit line connecting the areas of Woodlawn, Edmondson Village, West Baltimore, downtown Baltimore, Inner Harbor East, Fells Point, Canton and the Johns Hopkins Bayview Medical Center Campus.

In support of Governor Martin O'Malley's "Smart, Green & Growing" initiative, the Red Line should provide enhanced mobility and connecting service to Baltimore's existing transit systems - MARC commuter service, metro, light rail and local and commuter bus routes.



RED LINE SCHEDULE

Milestone	Projected Timeframe
Begin Preliminary Engineering	June 2011
FTA Acceptance of Final Environmental Impact Statement	December 2012
FTA Issuance, Record of Decision	February 2013
Engineering Phase	2013-2016
Federal Funding Commitment	2014
Construction	2015-2021
Operation	2022

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

III MTA RED LINE PLANNING UPDATE (Contd.).

RED LINE KEY FACTS

Mode	Light Rail	
Overall Length	14.1 miles	
	Surface	8.7 miles
	Tunnel	4.7 miles (Cooks Lane & Downtown)
	Aerial	0.7 miles (over I-695 and ramps; Woodlawn Drive; and between Highlandtown/Greektown & Bayview Campus Station)
Stations	19	
	Surface	14
	Underground	5
Capital Cost	\$2.6 Billion	
Average Daily Ridership in 2030	54,000	
FTA Cost-Effectiveness Rating	\$30.00	
Vehicles	26 LRT vehicles	
Maintenance Facility	At Calverton Road bounded by Franklinton Road, Franklin Street, and Amtrak	
One-Way Travel Time	Woodlawn to Bayview – 45 min.	
Frequency of Service (Peak/Off Peak)	10 minutes	

Appendix A – G appear on the following pages

This document contains several appendix, A = the CAC Meetings/Agenda/Locations; B = The CAC Planning Retreat; C = The Financial Report; D = Mission of the Red Line CAC; E = Analysis of Red Line Criteria; F = MTA Red Line Planning Process; and G = Community Comments, that the CAC uses as references to guide its fulfillment of HB 1309/SB873, as information for first time readers of the Red Line CAC Annual Report. These documents will be updated as the project progresses.

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

Appendix A - CAC MEETINGS

AGENDA, DATES, LOCATIONS

September 13, 2012 - MSBC Community Outreach and Educational Center
Subcommittee Reports

MTA Reports: • FEIS Timetable • Summer Outreach Summary • Architectural Concepts for Underground Stations

November 8, 2012 - UM BioPark Life Sciences Conference Center
Subcommittee Reports

MTA Reports: • Overview of FEIS Findings • Public Art Program

January 10, 2013 - Johns Hopkins Bayview
Subcommittee Reports

MTA Reports: • CAC Membership • Preview of Legislative Session • FEIS Public Review and Proposed Mitigation of Impacts to Historic Resources • Update on Community Liaison Activities

March 14, 2013 - St. William of York Church
Subcommittee Reports

MTA Reports: FEIS Comments; Record of Decision • Legislative Session • Baltimore City Workforce Initiatives • Architectural Concepts for Operations & Maintenance Facility

May 9, 2013 - UM BioPark Life Sciences Conference Center
Subcommittee Reports

MTA Reports: Environmental Mitigation Plans • Structural assessments for Cooks Lane/downtown tunnels • Right-of-Way Acquisition

July 11, 2013 - Coppermine Fieldhouse - Du Burns Arena - Canton
Subcommittee Reports

MTA Reports: Station Design/SAAC Presentations Tunnel Safety Presentation Construction Mitigation/Maintenance of Traffic (Rescheduled)

Subcommittee Reports

Construction and Operation Impacts and Mitigation has responsibility for addressing the impact of building and construction on the neighborhoods through which the Red Line will eventually pass. It is tasked with collecting and disseminating information about resources for those impacted by the construction, as well as working with the community to come up with creative ways to make construction more manageable for neighborhoods. The subcommittee members have been meeting with the MTA and the engineers tasked with planning the construction and related issues that will impact the flow of traffic and quality of life in affected areas.

The Construction and Operation Impacts and Mitigation Subcommittee met with the engineering group assigned to the construction and traffic mitigation along the Red Line corridor (GEC). GEC provided valuable information regarding the manner and sequence of the adjustments to traffic patterns and other changes that will be required as the construction proceeds.

Major construction projects such as the Baltimore Red Line require permanent and temporary changes to traffic patterns. Maintenance of Traffic (MOT) plans are created to efficiently manage these changes and to ensure the safe circulation of construction workers, pedestrians, and vehicles during the construction phase. The plans may include detour routes, signage, temporary striping, barriers and/or use of cones to direct traffic.

Appendix A - CAC MEETINGS (Contd.)

The Red Line MOT plans will use similar methods to mitigate the impacts to traffic throughout the project area during construction. Implementing these plans requires coordination with concurrent construction projects, intersecting roads, emergency services and more. Therefore, coordination must occur between the MTA, Baltimore City/Baltimore County agencies such as the Department of Transportation, Department of Public Works and Fire Departments, as well as the community. The details of the plans are developed during Final Design and refinements continue through construction planning and coordination with the construction contractors.

Coordination and communication does not stop with the start of construction. MOT plans may need to be modified to reflect changes that occur during the construction phase. The MTA will communicate with stakeholders and communities early and frequently to inform them and get their feedback on updates to MOT plans. The MTA is currently in the initial stages of developing MOT plans for the Red Line and will begin outreach to communities when the concepts for MOT are best developed for presentation and input.

The Red Line will be reducing Edmondson Avenue, Franklin Street, and Mulberry Street from 3-lanes of traffic to 2-lanes in each direction to accommodate the proposed improvements. Improvements will include roadway replacement/resurfacing, utility re-locations, drainage upgrades, sidewalk replacements, lighting, and landscaping in addition to the light rail system. Sidewalks will be replaced to a 6-ft width as the corridor allows with the minimum sidewalk width at 5-ft. The Red Line is planning to use poles along the center of the roadway to carry the light rail power and street lighting. Pedestrian lighting is planned along the sidewalks. In several locations, small "strips" of Right-of-Way will need to be acquired from the property owners to accommodate the improvements.

The Red Line will either maintain, or relocate to another intersection, the existing traffic signals. The signalized intersections will have vehicular turning lanes for left turns and u-turns and pedestrian crosswalks. All un-signalized crossings will be eliminated for safety. Mt. Holly Street, Edgewood Street, Evergreen Street and Smallwood Street will have traffic signals specific for pedestrian usage. These signals will only allow pedestrians to cross Edmondson Avenue, Franklin Street, and Mulberry Street.

During construction, the roadways will be reduced to 2-lanes in each direction. It will shift across the roadways in phases to allow construction of the proposed improvements. Pedestrian movements and residential access will be maintain as much as possible during construction. Roadway intersections will be closed for multiple week durations to install the transit-way. These closures will be phased to maintain health and safety access to the communities.

The question of how the Red Line would cope with any breakdown in one of the downtown tunnels, given the absence of a crossover was explained. The plan is to operate in alternate directions in the unobstructed tube. It was estimated that 2/3rds of the trains will be reversed approaching the tunnel from both sides of town during the time that one tube was blocked. Passengers on the trains that that are reversed during this period would need to exit at the stations prior to the tunnel and await a train that will proceed through the tunnel or find alternate means for travel.

Economic Empowerment subcommittee is responsible for hiring preferences to residents of legislative districts in which the Red Line transit project will be constructed or to residents of legislative districts adjacent to those in which the Red Line transit project will be constructed. This subcommittee consistently met, inviting guest speakers from contractors assigned to the project, including MTA to discuss potential hiring needs and requirements, opportunities for internships, and the development of a pipeline of candidates to be ready to fill job opportunities for the Red Line project. It not only focused on creating jobs, but also entrepreneurial opportunities for persons on the Red Line footprint. The Economic Empowerment subcommittee also works in conjunction with the Baltimore City Red Line Community Compact Empowerment committee.

Neighborhood and Community Development subcommittee is responsible for ensuring communication of information to communities regarding the planning, engineering, and construction process is meaningful and the public, in particular those who are in the Red Line footprint has an opportunity to provide input. This committee has been instrumental in some of the guidelines for public comments that we have in place at the CAC meetings, as well as making sure there are various opportunities for community involvement to resolve plans that could have an adverse impact on community safety, as well as overall development.

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

Appendix A - CAC MEETINGS (Contd.)

ATTENDANCE AT PUBLIC MEETINGS

NAME	2012 SEPT.	2012 NOV.	2013 JAN.	2013 MAR.	2013 MAY	2013 JULY	TOTAL
Dr. Rodney Orange ¹	YES	YES	NO	YES	YES	YES	5/6
Angela Bethea-Spearman ¹	YES	YES	YES	YES	YES	YES	6/6
Margie Carvella	NO	NO	VACANT	VACANT	VACANT	VACANT	0/6
Edward Cohen	YES	YES	YES	YES	YES	YES	6/6
Sandra Conner	YES	YES	YES	YES	YES	YES	6/6
Christopher Costello	NO	YES	YES	YES	YES	YES	5/6
Michael Dickson	NO	YES	YES	YES	NO	YES	4/6
Gary Cole/Laurie Feinberg	YES	YES	NO	YES	YES	YES	5/6
Jason Filippou	NO	YES	NO	NO	NO	NO	1/6
Emery Hines	YES	YES	YES	YES	YES	YES	6/6
Charles Sydnor, III Jack Lattimore	YES	YES	NO	YES	NO	VACANT	3/6
Brooke Lierman	NO	YES	NO	YES	NO	NO	2/6
George Moniodis	YES	YES	NO	YES	NO	NO	3/6
Annie Williams	EXCUSED	EXCUSED	EXCUSED	EXCUSED	EXCUSED	EXCUSED	0/6
Jamie Kendrick/ Barbara Zektick	YES	YES	YES	NO	YES	YES	5/6
QUORUM	9/15	14/15	7/14	11/14	8/14	9/13	

Maximum attendance by members is expected. Members missing three regular meetings during a twelve-month period shall be automatically reviewed by the CAC. *Subcommittee meeting

MEETING ATTENDANCE – GENERAL PUBLIC

2012		2013				TOTAL
SEPT.	NOV.	JAN.	MAR.	MAY	JULY	
7	10	8	23	5	32	85

Appendix A - CAC MEETINGS (Contd.)

RESOLUTION



March 15, 2013

Dear (*sent to all members of the Maryland General Assembly*):

At its meeting on March 14, 2013, the Red Line Citizens Advisory Council (CAC) adopted a resolution and requested that I transmit it to you on behalf of the CAC. The resolution which passed by majority but not unanimous vote is as follows:

Resolved, that the Red Line Citizens Advisory Council, an entity created by the Maryland General Assembly to advise the Maryland Transit Administration on policy matters concerning implementation of the Baltimore Red Line, urges the legislative delegations representing Baltimore City and Baltimore County to support the necessary funding for the Red Line.

The CAC was created by the General Assembly in 2006 to advise the Maryland Transit Administration on the development and implementation of the Baltimore Red Line, a light rail line in Baltimore City and Baltimore County. The CAC consists of 15 members appointed by legislators from legislative districts along the corridor. We meet regularly to hear reports and provide advice to MTA, and we prepare an annual report.

Thank you for your service to citizens of the region.

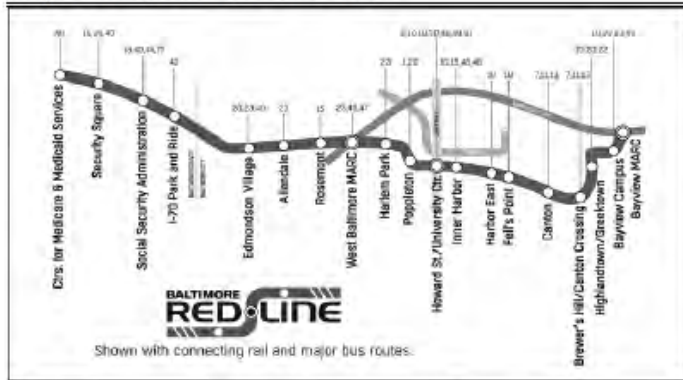
Sincerely,

Christopher B. Costello
Member, Red Line CAC
(On behalf of the Red Line CAC)

Appendix B - FINANCIAL REPORT

Maryland Transit Administration -- Line 39

CONSTRUCTION PROGRAM



PROJECT: Baltimore Red Line

DESCRIPTION: The Baltimore Red Line is a 14-mile double track light rail line between Woodlawn in Baltimore County and Bayview Medical Center in Baltimore City. The line will include direct connections to the existing Metro Subway and Light Rail lines and the MARC Train Penn Line. The project includes track, two tunnels, stations, railcars, and an operations and maintenance facility.

PURPOSE & NEED SUMMARY STATEMENT: The Red Line will provide faster, more reliable transportation between residential and major employment areas. It will enhance access to existing rail lines, increase transit capacity in congested corridors, support economic development consistent with local master plans, and reduce environmental impacts. The Red Line is the next step in making the Baltimore transit systems connections integrated, linking residents and job centers with other parts of the transit network that serve the region.

SMART GROWTH STATUS: ☐ Project Not Location Specific ☐ Not Subject to PFA Law
☒ Project Inside PFA ☐ Project Outside PFA
☐ PFA Status Yet to Be Determined

☐ Grandfathered
☐ Exception Will Be Required
☐ Exception Granted

ASSOCIATED IMPROVEMENTS:
MARC West Baltimore Station Parking Expansion - Line 9

STATE GOALS: Maryland Transportation Plan (MTP) Goals/Selection Criteria:

- ☐ Quality of Service ☐ Safety & Security
☐ System Preservation & Performance ☒ Environmental Stewardship
☒ Connectivity for Daily Life

EXPLANATION: The Red Line will serve a corridor that currently lacks rail transit service and includes important commercial, institutional, and residential communities. Electrically powered trains will reduce air pollution and greenhouse gas emissions associated with cars and buses.

STATUS: Preliminary engineering and right of way acquisition underway. Pending federal approval, final design to begin during current year.

POTENTIAL FUNDING SOURCE:		<input checked="" type="checkbox"/> SPECIAL	<input checked="" type="checkbox"/> FEDERAL	<input type="checkbox"/> GENERAL	<input checked="" type="checkbox"/> OTHER							
PHASE	TOTAL ESTIMATED COST (\$000)	EXPEND THRU 2013	CURRENT YEAR 2014	BUDGET YEAR 2015	PROJECTED CASH REQUIREMENTS FOR PLANNING PURPOSES ONLY				SIX YEAR TOTAL	BALANCE TO COMPLETE		
Planning	80,807	80,807	0	0	0	0	0	0	0	0		
Engineering	252,159	94,403	53,033	40,297	37,986	14,482	11,958	0	157,756	0		
Right-of-way	64,679	672	34,615	26,116	3,276	0	0	0	64,007	0		
Construction	2,054,459	0	0	9,900	24,885	201,772	530,792	561,055	1,328,204	726,255		
Total	2,432,104	155,882	87,648	76,313	65,947	216,254	542,750	561,055	1,549,967	726,255		
Federal-Aid	921,783	21,783	55,193	0	44,807	100,000	191,955	393,732	785,687	114,313		

SIGNIFICANT CHANGE FROM FY 2013 - 18 CTP: The total cost is estimated to be \$2.6B. Advancement to construction assumes \$900.0M in federal funding, \$250.0M in regional contributions. The remainder of the funds will be a combination of state and private investment through a public-private partnership for railcars, systems, and a maintenance facility.

USAGE: Daily ridership estimated at 54,000 in 2035.

Note: The Total Estimated Cost does not reflect availability payments to the concessionaire in a public-private partnership.
0862

Appendix C - MISSION OF RED LINE CITIZENS ADVISORY COUNCIL (CAC)

An explanation of what the CAC was commissioned to do and how those requirements are being fulfilled.

The Red Line Citizens Advisory Council was established by an Act of the Maryland State Legislature and has been meeting since September 2007. The mission of the Council as codified in HB 1309 is to advise the MTA on certain major policy matters surrounding the Baltimore Corridor Transit Study- Red Line including:

1. Compensation for property owners whose property is damaged during the construction of any Red Line project, redevelopment of commercial areas surrounding the Red Line transit corridor in Baltimore City and Baltimore County, and providing hiring preferences to residents of legislative districts in which the Red Line transit project will be constructed or to residents of legislative districts adjacent to those in which the Red Line transit project will be constructed.
2. Consideration of a full range of construction alternatives, including an underground rail option.
3. Ensuring that the Red Line project:
 - a) Benefits the communities through which it will travel;
 - b) uses an inclusive planning process, including consultation with community residents, businesses, and institutions in the corridor;
 - c) is planned to maximize the likelihood that federal funding will be obtained for the project;
 - d) includes, during its planning phase, the distribution of factual information that allows the community to compare the costs, benefits, and impacts of all construction alternatives;
 - e) favors alignments that produce the least negative community impacts practicable; and
 - f) places a priority on maintaining the Study schedule

In addition, the CAC has assumed the responsibility to enhance communication of information to communities regarding the planning, engineering, and construction process.

The CAC holds six meetings during the year (September, November, January, March, May and July). Meeting locations are rotated between Downtown, East and West Baltimore; and Baltimore County in an effort to make meetings more accessible to the residents along the Red Line corridor.

In order to provide more structure for its meetings, the CAC has established a subcommittee to develop bylaws. The bylaws, which provide an outline of the framework and rules under which the CAC operates, were approved by CAC (see Appendix 3). By law, the CAC is composed of 15 members representing business owners, residents, service providers, and workers in the Red Line transit corridor. These members were appointed by the President of the Senate, the Speaker of the House, the Governor, the Mayor of the City of Baltimore, and the County Executive of Baltimore County. Upon its establishment, MTA designated two co-chairs in the persons of Dr. Rodney Orange and Ms. Joyce Smith. Upon the resignation of Ms. Smith, and in accordance with the House Bill and the CAC bylaws, MTA designated a new co-chair in the person of Ms. Angela Bethea-Spearman.

Faced with the task of advising the MTA on certain policy matters regarding the Red Line Project, the CAC established an Evaluation Criteria Subcommittee to develop a set of measurement tools for each of the missions set forth by the legislature. The criteria that were developed are expected to evaluate benefits to communities and to minimize negative impacts on those communities, as well as to make sure that the Red Line planning process maximizes the likelihood that federal funding will be obtained for the project.

Based on the current authorized requirements for funding New Starts projects criteria, measurable outcomes will be used to review mobility improvements, environmental benefits, operating efficiencies, cost effectiveness, transit - supportive land use policies and future patterns, economic development effects and local financial commitment. In developing these criteria, the CAC subcommittee has researched DEIS processes in other parts of the country. These examples were used to develop its own criteria which may or may not overlap with the DEIS evaluation criteria. Examples of such criteria are: equity analysis, public participation and information sharing.

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

Appendix C - MISSION OF RED LINE CITIZENS ADVISORY COUNCIL (CAC) (Contd)

The Evaluation Criteria tables were approved in unanimity by the CAC, and they were made available to the public through the MTA's website. Since most of the criteria and measurement units follow the DEIS structure, the CAC has relied on MTA to provide data for input into the CAC Evaluation criteria tables. The CAC has learned that not all the data required in the Evaluation Criteria tables are available. Some of the data will become available during the subsequent phases of the project up to and including the Final Design and Engineering, etc. Also, information on properties and businesses damaged during construction will not be available until construction of the Red Line starts. It is important to note that the CAC doesn't have the technical expertise to analyze the sets of data MTA has provided. Therefore, it relies on individual judgment of Council members, as well as interpretation and explanation required from the MTA's technical team. The criteria tables and measurement units, and input of available data are presented in Section V.

Over the course of the last year, the CAC has received presentations on alternative design options, presentations from citizen and advocacy groups, presentations by individual CAC members, and presentations in response to community concerns.

Methodology

CAC efforts on behalf of the citizens and the legislature are separate and independent from the Maryland Transit Administration's Red Line planning effort. The MTA has maintained its own separately established multi-year schedule to design, document, and construct the Red Line.

The CAC has provided comment areas related to each of the policy matters identified by the legislature. It is the objective of the CAC report to document matters of concern to individuals, communities, and council members so that members of the legislature learn first hand about issues and concerns of local citizens regarding the Red Line Project.

Appendix D - ANALYSIS OF THE RED LINE CRITERIA

5.1.0

Mission No. 1 - Ensure that the Red Line Project provides compensation for property owners whose property is damaged during the construction of any Red Line project, redevelopment of commercial areas surrounding the Red Line transit corridor in Baltimore City and Baltimore County, and providing hiring preferences to residents of legislative districts in which the Red Line transit project will be constructed or to residents of legislative districts adjacent to those in which the Red Line transit project will be constructed.

Project Compensation Criteria			Employment Opportunities Criteria	
Residential displacements	Business & Institutional displacements	Property damaged during construction	Number of construction workers who reside within the Red Line legislative districts (city, county data)	Number of other jobs created by Red Line Project (city, county data)
0	21	*	**	***

* Data will not be available until construction is ongoing.

** 2000 Census data reports that 5% of the population residing within the Red Line Corridor Study area is employed in the construction industry.

*** Data is not available. A significant number of temporary jobs would be created for several years during construction. The Red Line could so result in the creation of permanent jobs to operate and maintain the system. Aside from the creation of permanent jobs, the Red Line should provide economic benefits by improving transit access and mobility for the work force and consumers within the study area.

5.1.1 Project Compensation - includes: property acquisition, business displacement and property damaged during construction.

Comment: *Sufficient information is not available to respond at this time.*

5.1.2.0 Employment Opportunities Related to the Red Line – includes potential construction job creation and other job possibilities

Comment: *If or when the federal funding for the Red Line is approved, a great deal of work will be needed to facilitate the creation of job opportunities related to the construction of the Red Line. The primary objective should be to provide job opportunities to the residents in the Red Line corridor. At some point, this effort would require the coordination of multiple state and local government organizations to identify the skills needed for the jobs to be created. The availability of persons with those skills in the area and the development of needed training to prepare potential job applicants where the necessary skills are not available.*

5.2.0 Mission No. 2 - Ensure that the Red Line project takes into consideration a full range of construction alternatives, including an underground rail option, as well as mode and alignments.

No.	Criteria	Source/Project Phases					
		DEIS	New Starts/LPA	PE	Final Design	ROW Acquisition	Constr
1	Review DEIS alternatives			N. A	N. A	N. A	N. A
2	Review TRAC alternative + Fells Point alternative			N. A	N. A	N. A	N. A
3	Minimum Operable Segments			N. A	N. A	N. A	N. A

Appendix D - ANALYSIS OF THE RED LINE CRITERIA (Contd.)

5.3a.0 Mission No. 3a - Ensure that the Red Line project benefits the communities through which it will travel.

Mobility Improvements Criteria									
Transit User benefits	Number of transit dependents using the project	Transit dependent user benefit per passenger mile	Share of user benefits received by transit dependent users	Red Line Travel time (end-to-end) minutes	Number of Transit-Dependent Households Served by Enhanced Transit	Pedestrian and disabled access	Differences in transfer access	Connectivity between transit system elements	Appeal to drivers of choice (Daily new trips vs. No Build)
18,410	21,900	3.7	30%	45	14,148	*	**	N. A	18,170

* This calculation was not performed; data is not available.

** Data is not available.

*** This information is not available at a corridor-level. Volume II of the DEIS identifies at a Geographic Area level, by yes or no, whether the existing pedestrian movements are affected.

Table 5.3a (continued)

Environmental Benefits Criteria			Land use/community development, economic development & access to jobs Criteria				Equity Analysis Criteria	
Daily Auto VMT Change No Build	Noise	Vibration	Development potential within walking distance of station area (# of city/county planned development TOD Locations)	Jobs near station	Employees within walking distance to station area	Future employees within ¼ -mile of station area (BMC, Community Profile)	Extent to which the transit investments improve transit service to various population segments, particularly those that tend to be transit dependent (EJ analysis)	Incidence of any significant environmental effects, particularly in neighborhoods adjacent to proposed project (EJ Impact)
75,000	*	**	5	***	NA	NA	NA	NA

* Information is not available at a corridor-level. The DEIS presents noise impacts by Geographic Area.

** Information is not available at a corridor-level. The DEIS presents vibration impacts by Geographic Area.

*** Information is not available at a corridor-level. The Stations Technical Report includes the number of jobs per acre within the ¼ mile walk zone of the station.

5.3b.0 Mission No. 3b - Ensure that the Red Line project uses an inclusive planning process, including consultation with community residents, businesses, and institutions in the corridor.

No.	Criteria	Source
1	<i>Consultation</i> • MTA should consult the public on major decision with regard to the study	MTA will provide documentation
2	<i>Representativeness</i> • The public participants should comprise a broadly representative sample of the population of the affected communities • Community planning participation	MTA will provide documentation
3	<i>Transparency</i> • The planning process should be transparent so that the public can see what is going on and how decisions are being made	MTA will provide documentation
4	<i>Participation</i> • The number of stakeholders (individuals, groups, organizations) involved • Participation by local academic institutions and professional service providers in design and development	MTA will provide documentation

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.balTIMOREredline.com/project-information/citizens-advisory-council>

Appendix D - ANALYSIS OF THE RED LINE CRITERIA (Contd.)

5.3c.0 Mission No. 3c - Ensure that the Red Line project is planned to maximize the likelihood that federal funding will be obtained for the project.

No.	Criteria	LPA	PE	Final Design	ROW Acquisition	Constr
1	<i>Operating Efficiencies</i>					
	Operating & maintenance Costs	-1.438 M				
	Capital costs	\$2.6 B				
2	<i>Cost Effectiveness</i>					
	Incremental cost per hour of transportation system user benefit	\$22.77				
3	<i>Local Financial Commitment</i>					
	Share of non-Section 5309 New Starts funding	NA				
	Stability and reliability of the proposed project's capital finance plan	NA				
4	<i>Transit supportive land use policies and future pattern</i>					
	Existing land use	N. A				
	Transit supportive plans and policies	N. A				
	Performance and impacts of policies	N. A				

5.3d.0 Mission No. 3d - Ensure that the Red Line includes, during its planning phase, the distribution of factual information that allows the community to compare the costs, benefits, and impacts of all construction alternatives.

No.	Criteria	Source
1	<i>Information Sharing</i> ❖ MTA provide timely information on the planning phases of the project, as well as information on job training and opportunities as it pertains to the Red Line project	MTA required to provide documentation*

* The requested information has not always been provided in the time requested by the CAC.

Appendix D - ANALYSIS OF THE RED LINE CRITERIA (Contd.)

5.3e.0 Mission No. 3e - Ensure that the Red Line project favors alignments that produce the least negative community impacts practicable.

No.	Criteria	New Starts/LPA	PE	Final Design	ROW Acquisition	Constr
1	<i>Equity Analysis*</i>					
	Extent to which the transit investments improve transit service to various population segments, particularly those that tend to be transit dependent	N. A	²			
	Incidence of any significant environmental effects, particularly in neighborhoods immediately adjacent to proposed project	N. A				
2	<i>Evaluate Negative Impacts</i>					
	Neighborhood noise	N. A				
	Loss of travel lanes	N. A				
	Neighborhood parking congestion (net gain or loss)	N. A				
	Visual impacts (non- quantitative)	N. A				
	Project construction delays	N. A				
	Community choice (document support or opposition to the project)	N. A				

5.3f.0 Mission No. 3f - Ensure that the Red Line project places a priority on maintaining the Study schedule.

DEIS Submission to FTA and other agencies	April 11, 2008
DEIS revised based on FTA & agency comments	July 3, 2008
FTA signature on DEIS	July 25, 2008
Begin DEIS print and distribution logistics	August 15, 2008
DEIS completed and available to the public	October 3, 2008
90 day comment period	Oct. 2008 to Jan. 2009
Public Hearings	November 2008
Selection of Locally Preferred Alternative	August 2009
Next Steps - Enter the New Starts Process and Initiate Preliminary Engineering / Final EIS	June 2011
Final Design	2013 - 2015
Right of Way Acquisition & Begin Construction	2015

² During the January 10, 2013 public meeting at Johns Hopkins Bayview, reference was made to a report regarding Final Environmental Impact Statement (FEIS) that was produced by the Joint Open Infrastructure Subcommittee (JOIS). The JOIS includes members from three standing MTA Citizens Advisory Committees (MTA Citizens Advisory Committee, MARC Citizens Advisory Committee, Citizens Advisory Committee for Accessible Transportation). The report issued by JOIS examined and analyzed the bus to bus connections that would be affected once the Red Line becomes operational and determined that 100 of these transfer opportunities would be lost while only three (3) would be created. Page 10 of the report in question, which illustrates the bus to bus connections affected by the Red Line, is located in the Public Comment Section – Appendix F.

Appendix E - MTA REVIEW OF RED LINE PLANNING PROCESS

Describe the New Start Opportunity Process

The proposed Red Line is an east-west transit corridor connecting the areas of Woodlawn, Edmondson Village, West Baltimore, downtown Baltimore, Inner Harbor East, Fells Point, Canton and the Johns Hopkins Bayview Medical Center Campus. In addition, the Red Line would provide enhanced mobility and connecting service to Baltimore's existing transit systems - Metro Subway, Central Light Rail and MARC lines - while also serving major employers such as the Social Security Administration, the University of Maryland downtown campus and medical centers, and the downtown Central Business District, schools, churches, parks and tourist attractions. The western portion of the Red Line study area consists of suburban type residential, shopping and office park land uses. The study area continues through downtown and Fells Point/Patterson Park areas and includes Baltimore row-house communities, planned revitalization areas in West Baltimore and the redeveloping residential and commercial areas in Inner Harbor East. Alternative modes considered included Bus Rapid Transit (BRT), Light Rail Transit (LRT) and Enhanced Bus Service on surface, and in some locations, with tunnel options. A No-Build option was also included in this study.

Red Line Corridor Transit Project - Purpose and Need Statement Context

The purpose of the Red Line Corridor Transit Project is to help improve transit efficiency, transit mobility, access and connectivity in Baltimore City and Baltimore County. This project is a step in the ongoing development of a system of interconnected rapid transit lines, which will improve the quality of transit in the Baltimore region and the study corridor in a cost effective and efficient manner. The Red Line Corridor Transit Project includes the general area of Woodlawn in Baltimore County on the west, through downtown Baltimore, to the Patterson Park/Canton area to the east.

Purpose

The purpose of the Red Line Corridor Transit project is to improve transportation choices for those persons living and working in the region, support ongoing and planned economic development initiatives and community revitalization, and help the region address congestion and traffic-related air quality issues. The project will connect the eastern and western communities of Baltimore City and Baltimore County with the central business district in downtown Baltimore, suburban employment centers such as the Social Security complex in Woodlawn, and new activity centers in East Baltimore. The Red Line Corridor Transit Project will be completed in a manner that avoids, minimizes, and mitigates adverse impacts on the environment and communities.

Need

There are a number of transportation problems in the region and corridor. These problems will be used as benchmarks as alternatives are developed to measure how successfully each addresses the purpose and need of the Red Line Project.

Transit Efficiency:

At the present time, existing bus service in the corridor is subject to the same traffic congestion as autos, faces incident delays, and provides limited direct connections to other transit modes. There are a variety of transit travel patterns throughout the corridor; the current bus system faces the challenge of efficiently serving these sometimes conflicting and competing trips (local vs. through trips). The purpose of this project is to improve transit service efficiency in the region and along the Red Line Corridor, and provide connections to jobs and services.

Transportation Choices for East-West Commuting:

Parts of the corridor currently face congestion with limited transit and system capacity improvement options for commuters traveling from the east or from the west into downtown. The purpose of this project is to improve transit opportunities in the east-west corridor, and better accommodate existing and future east-west travel demands. Its purpose is also to improve the effectiveness of public transportation for the transit-dependent user as well as those individuals within the corridor who chose to use transit as an option.

Appendix E - MTA REVIEW OF RED LINE PLANNING PROCESS (Contd.)

Transit System Connectivity:

Although Baltimore has a light rail system, Metro service, commuter rail, express bus and a comprehensive local bus network, better connections among the various modes and routes would enhance service to the public regionally and in the corridor. The purpose of this project is to improve system connectivity by providing a direct rapid transit connection to north-south bus and rail lines, including to MARC at the West Baltimore MARC Station, Charles Center and Shot Tower Metro Stops.

Mobility:

There are substantial numbers of residents along the Red Line who depend on transit for access to jobs, schools, shopping, events, healthcare and other services and cultural attractions. Major institutions and employers along the Red Line Corridor such as the Social Security Administration, the Center for Medicare and Medicaid Services, the University of Maryland at Baltimore, Baltimore City Community College, major hospitals, the downtown business district, new cultural arts venues, as well as numerous elementary, middle and high schools, all rely on an efficient transportation network that provides mobility choices.

Community Revitalization and Economic Development:

Although development patterns are influenced by market forces and other variables not necessarily directly related to transit accessibility, there are currently unrealized opportunities for supporting existing and potential land use growth patterns that could benefit communities and businesses along the corridor. The Westside Renaissance, University of Maryland at Baltimore, Inner Harbor East, Fells Point, Canton and other nearby areas are currently experiencing major development and re-development and could benefit from additional transit access to realize their regional potential. Likewise, areas of West Baltimore have existing community revitalization initiatives such as The Uplands Redevelopment Area, Harlem Park and Rosemont, and other unrealized commercial and residential development-potential areas that could benefit from improved transit access and investment. Areas in suburban locations such as Westview and Security Square malls could realize additional development opportunities. Specifically at transit stops, localized development and/or redevelopment will be supported by the Red Line project.

Air Quality Goals and Environmental Stewardship:

The U.S. Environmental Protection Agency has designated the region as a moderate non-attainment area for ozone under the 8-hour standard. There are many contributors to the region's air pollution, including "point sources" such as power plants, "area-sources" such as automobile refinishing, bakeries, "off-road sources" such as mowing and construction equipment, and perhaps most significantly, motor vehicle sources. By offering an effective alternative to automobile travel for a significant portion of work and non-work travel, improved transit service in the corridor can help reduce regional emissions for motor vehicle sources by helping to reduce highway congestion and regional vehicle emissions. These reductions in motor vehicle emissions would help the Baltimore region to stay in consistency with state air quality plans as required by the Federal Clean Air Act and by ISTEA and TEA-21. This transit planning study is also expected to identify potential environmental stewardship opportunities to enhance and improve the existing natural environment and surrounding communities, and provide under-served communities with access to park, trail and other recreational opportunities.

Definition of Alternatives Retained for Detailed Study

The information collected from the public and environmental resource agencies during the Scoping phase was used to identify, consider, and analyze types of transit (modes) and routes (alignments) for both the Red Line and the Purple Line that are reasonable, feasible, and practical from a technical and economic standpoint.

The MTA held open houses in the fall of 2004 to receive input on selected alternatives that will be studied in greater detail. The MTA is also required by the Federal Transit Administration to study a "no-build" alternative, which compares the proposed new transit alternatives to the option of not building a new transit project.

Additional alternatives have since been developed. MTA continues to conduct outreach efforts and community meetings to present information and receive input from the community.

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

Appendix E - MTA REVIEW OF RED LINE PLANNING PROCESS (Contd.)

Preliminary Engineering

Further analysis of design options, project costs, benefits and impacts.

Final Environmental Impact Statement (FEIS)

The Final Environmental Impact Statement (FEIS) identifies a preferred alternative, responds to comments received on the DEIS, shows compliance with related environmental statutes such as the National Historic Preservation Act, and identifies commitments made to mitigate impacts of the project.

Station Planning Process

The transit station is the area in which transit users get on and off the system and have their first impressions of the Red Line Corridor. Because of this, the planning of stations will be critical to the overall success of the Red Line Study.

DETERMINE the number and general location of stations

The proposed Red Line is an east-west corridor that connects major employment, residential communities, other existing transit services, and tourism opportunities. This project has examined the various key areas along the corridor to ensure transit service is provided. These key areas include the following:

Social Security Administration / Woodlawn
Center for Medicare and Medicaid Services (CMS)
Residential Communities - East and West Baltimore City and Western County
West Baltimore Rail Station (MARC)
University Center (Medical Center and University)
Connection to existing Metro, Bus and Light Rail
Downtown Baltimore
Tourism and Stadium Events
Inner Harbor East
Fells Point and Canton
Auto Commuters using I-70 and I-695

Because each stop made by the transit vehicle adds time to the overall trip, a rapid system requires fewer stops along the entire corridor to ensure faster commuting times. The number of stations for the Red Line Corridor must be a balance between ensuring that the key areas are provided transit service and maintaining a rapid transit system.

14 Stations are under consideration for the Red Line as currently configured.

DEFINE the type of station

A station type is defined based upon the purpose of that station in its particular environment. For example, a station in the Central Business District of a city would be defined as a Walk-Up Station Type, not a Station with Parking for Regional Access

Light Rail

Light Rail Transit is an electric railway system that operates single cars or short trains along rights-of-way at ground level, on aerial structures, and in tunnels. Light Rail can also operate in the street mixed with vehicular traffic, in the median of a roadway or on a separate right-of-way. Light Rail Transit gets its power from overhead electrical lines. Maximum speeds of Light Rail trains are normally around 60 miles per hour, with the average operating speed being closer to 45 miles per hour. The actual speed largely depends on the extent to which the train is separated from cars and pedestrians.

Depending upon the specific system, the distance between Light Rail stations is shorter than with heavy rail systems due to the type of propulsion and braking systems. Fare collection is typically done at the station before boarding the train and an attendant verifies fare-purchase while the train is in motion.

Light Rail currently operates in Baltimore along the 30-mile Central Light Rail Corridor between Hunt Valley, downtown Baltimore and Glen Burnie. Spurs also serve BWI Airport and Penn Station. Light Rail has been built in several other American cities:

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

Appendix E - MTA REVIEW OF RED LINE PLANNING PROCESS (Contd.)

NEPA Process – How decisions are made

As with every significant federally funded transportation project, the National Environmental Policy Act of 1969 (NEPA) requires that an Environmental Impact Statement (EIS) be prepared for the Red and Green Line Studies. The purpose of the EIS document is to conduct a thorough and public study of potential human, cultural, and natural environmental impacts for each of the transit types (modes) and routes (alignments) under consideration.

Study Steps:

Notice of Intent

The Notice of Intent (NOI) is an announcement to the public and to interested agencies that a project is being developed and that an Environmental Impact Statement (EIS) will be prepared.

Scoping

Scoping identifies the alternatives and impacts that will be examined in the Environmental Impact Statement (EIS). An important part of this phase is to go out to the public for their ideas, comments and concerns. Scoping identifies the key resources and issues that the project needs to address.

Alternatives Analysis

The information collected during the Scoping phase will be used to identify, consider, and analyze types of transit (modes) and routes (alignments) that are reasonable, feasible, and practical from a technical and economic standpoint.

Draft Environmental Impact Statement

The MTA will prepare a Draft Environmental Impact Statement (DEIS) that includes examination of the natural, cultural and socioeconomic environmental impacts of various alternatives. The DEIS will be available for public review prior to hearings.

Final Environmental Impact Statement (FEIS)

The Final Environmental Impact Statement (FEIS) identifies a preferred alternative, responds to comments received on the DEIS, shows compliance with related environmental statutes such as the National Historic Preservation Act, and identifies commitments made to mitigate impacts of the project.

Record of Decision

The Record of Decision (ROD) is the final step in the EIS process. The ROD is a concise report that states FTA's determination that NEPA has been completed for the proposed project. It describes the basis for the decision, identifies alternatives that were considered and summarizes specific mitigation measures that will be incorporated into the project. With a ROD, the project may proceed into final design and construction.

Public Events/Meetings

Public meetings are an important part of our outreach efforts. Meetings will be held at major decision points such as when alternatives are selected for detailed study and when the results of those studies are nearing completion. A required public hearing will be held for comments on the Draft Environmental Impact Statement.

Citizens' Advisory Council

In 2006, the General Assembly passed a bill (HB1309) creating the Red Line Citizens' Advisory Council (CAC). The bill established the membership of the CAC and its role in the Red Line planning process. The CAC is responsible for advising the MTA on impacts, opportunities and community concerns about the Red Line.

The CAC has developed criteria to evaluate the Red Line's cost effectiveness, likelihood to obtain federal funding, impact on the communities it serves and whether it provides a quality transportation option.

Appendix F - COMMUNITY RESPONSE

The Red Line Citizens' Advisory Council (CAC) encourages written comments or concerns from individuals and organizations. Those provided during meetings are journalized in the minutes.

The written comments below are re-printed as they were received. Inclusion of these comments should not be construed as agreement or support of these comments on the part of the Red Line CAC

(#1) John Cutonilli

This message is intended for the Baltimore Redline Citizens Advisory Council. I would like them to respond to this message. I would also like my responses to the Final Environmental Impact Statement to be included in the annual report submitted to the State Legislature.

Dear Citizen's Advisory Council,

I am writing to you again about a concern that I have about the Baltimore Redline. Specifically, I do not believe that the Maryland Transit Administration (MTA) or the Baltimore Regional Transportation Board (BRTB) have evaluated all reasonable alternatives. It appears neither the BRTB nor the MTA are properly evaluating comments that I submitted to them.

In December of 2012, the MTA released the Final Environmental Impact Statement (FEIS). In this document, the MTA formally responded to comments submitted in the Draft Environmental Impact Statement (DEIS). They did not include the written comments that I submitted at the public hearings that they held for the DEIS. Based on the comments to the oral testimony, it does not appear that commenter properly evaluated the alternative. It appears that this alternative was ruled infeasible from a capital cost standpoint based on a dissimilar alternative (first heavy rail alternative). While both alternatives share some similarities including the use of the metro subway rail alignment, it differs in more ways than it is similar. This alternative is approximately heavy rail on half the alignment and bus rapid transit (BRT) over three quarters of the alignment, (overlaps approximately a quarter of the alignment) whereas the first heavy rail alternative is entirely heavy rail.

I responded to the DEIS comments as part of the FEIS. In these comments I explained how the comparison to the heavy rail was inappropriate. I also responded to their comments that they were reviewed on a range of factors by including comparisons of each section of the FEIS.

In March of 2013, the MTA released the Record of Decision for the environmental process. In this decision it indicated that the Federal Transit Administration evaluated the summary of comments, but does not indicate that they looked at the individual comments. The MTA has never release a summary of comments that included this proposal. This includes both the DEIS and the FEIS. I specifically mentioned this in my FEIS comments. It does not appear that they even evaluated my comments and simply reiterated the same DEIS comments. They also totally ignored two comments related to the impact of the redline on traffic and on long term impacts of turning movements

I wanted to write to you and alert you to the issues that I have been having. I would appreciate any help you can give to ensure that all reasonable alternatives are properly evaluated. I would also like to know what options are available to protest something like this.

Appendix F - COMMUNITY RESPONSE (Contd.)

(# 1 John Cutonilli Contd.)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

John Cutonilli
1606 Portugal St
Baltimore, MD 21231
jcutonilli@gmail.com
410-675-9444

vs

Federal Transit Administration
1200 New Jersey Ave SE
Washington, DC 20590

&

COMPLAINT (National Environmental Policy Act)
Maryland Transit Administration
6 St Paul St
Baltimore, MD 21202-1614

Introduction

1. This is an action to compel Defendants to comply with the National Environmental Policy Act (NEPA), and with the regulations and guidance implementing the statute. Specifically, Plaintiff seek declaratory and injunctive relief to ensure that Defendants do not implement the Baltimore Red Line Project (Project) before complying fully with federal environmental laws.
2. The Defendants failed to insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements (40 CFR 1502.24). They also failed to respond to comments (40 CFR 1503.4). This prevented the defendants from rigorously exploring and objectively evaluating all reasonable alternatives including reasonable alternatives not within the jurisdiction of the lead agency. (40 CFR 1502.14). Issues with the public participation process (40 CFR 1506.6) also contributed to the lack of examination of all reasonable alternatives.

Jurisdiction

3. Jurisdiction is proper in this Court under 28 U.S.C. § 1331 and 28 U.S.C. § 1346, because this action involves the United States as a defendant, and it arises under the laws of the United States (NEPA). Defendants have taken final agency action and there exists an actual, justiciable controversy exists between plaintiff and defendant. The requested relief is proper under 28 U.S.C. §§ 2201 & 2202, and Chapter 7 of the Administrative Procedure Act ("APA"), 5 U.S.C. §§ 701-706.

Venue

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391. Defendant Maryland Transit Administration is located within this District. Additionally, a substantial part of the events or omissions giving rise to the claim occurred within this District.

Parties

5. Plaintiff is a professional engineer with the state of Maryland. He lives within the Baltimore Red Line project area. He provided comments to the Defendants during the Draft Environmental Impact Statement (DEIS) and Final Environmental Impact Statement (FEIS) comment periods for this project. Some comments were lost, while the others did not have a proper scientific analysis performed.
6. Defendant Federal Transit Administration (FTA) is an operating administration within the United States Department of Transportation. The FTA served as a lead agency for the Project, and, in that capacity, was the federal entity legally responsible for ensuring compliance with NEPA and other federal statutes and regulations imposing substantive and procedural requirements. In purported compliance with those responsibilities, the FTA issued a Record of Decision (ROD) for the Project.
7. Defendant Maryland Transit Administration (MTA) is a Maryland State Agency. The MTA served as the project sponsor, and, in that capacity, purported to comply with NEPA by preparing various economic and environmental analyses, including the DEIS and FEIS.

Project

8. The ROD describes the project as follows. The Preferred Alternative consists of a 14.1-mile light rail transit line from the Centers for Medicare & Medicaid Services (CMS) in Baltimore County to the Johns Hopkins Bayview Medical Center campus in Baltimore City. The transitway includes a combination of surface, tunnel and aerial segments. Key elements include a new double-track alignment; two tunnels (Cooks Lane and Downtown Tunnels); an Operations and Maintenance Facility (OMF) for storage of up to 38 light rail vehicles; a traction power system including overhead catenary system; traction power substation; central instrument houses; 19 stations (14 surface and 5 underground); three new park-and-ride lots (Security Square, I-70, and Brewer's Hill/Canton Crossing); and ventilation system elements including ventilation buildings, fans, air plenums, and shafts for the underground sections; and other ancillary facilities.

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

Appendix F - COMMUNITY RESPONSE (Contd.)

(# 1 John Cutonilli Contd.)

9. The basis for the ROD is summarized as follows. The documents considered in making this decision include the September 2008 Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS), the August 2012 Reevaluation of the AA/DEIS, and the December 2012 FEIS, as well as technical memoranda, correspondence, and other documents in the project file. The FEIS presented the purpose and needs for the project; a chronology of the alternatives development and analysis for the project, including a description of the alternatives considered; probable construction methods and activities for the Preferred Alternative; transportation conditions in the project study corridor; environmental impacts; commitments and mitigation measures; a summary of public outreach and agency coordination since publication of the AA/DEIS; and a summary of comments received on the AA/DEIS and responses to those comments.

Factual Background

10. Problems with the project began in the scoping process. The lack of a proper scientific methodology for determining which alternatives could be considered reasonable was not presented in the scoping process. Things like ridership, travel patterns in the region, and costs to build various options were not presented. The scoping process consisted mostly of picking slight variations of a predetermined route with no accompanying information on how to choose between them.

11. This led to only two of the ten plus alternatives that were evaluated to be considered reasonable alternatives. These two alternatives consisted of surface Bus Rapid Transit (BRT) and surface Light Rail Transport (LRT). Neither of these options were very appealing to the public.

12. At the time of the AA/DEIS, the sole determining factor for FTA funding was cost effectiveness. There was also an FTA contribution limit of \$500 million that the MTA indicated was applicable. An examination of the ridership done by the plaintiff indicated that cutting costs were not likely to make the various alternatives more cost effective. It also appeared unlikely that ridership could be increased enough to make other alternatives more cost effective.

13. After reviewing ridership numbers, travel patterns, the costs to build various alternatives and availability of other rights of way, the plaintiff determined that another alternative deserved to be evaluated. The plaintiff determined that no single mode would be appropriate. The different sections of the corridor demanded different modes. This determination included scoping calculations of cost that were based on the costs of other alternatives.

14. The plaintiff determined heavy rail could be a viable alternative on the east side where it could connect the existing Metro into the existing Amtrak/MARC Penn Line corridor. This would allow cost effective expansion along the Penn Line (future purple line of the 2002 regional rail plan) and out to Dundalk as the Red Line was proposed to do in the 2002 regional rail plan. It would not be appropriate to expand it to the west due to costs and lack of expansion potential.

15. The plaintiff determined that BRT would be a viable alternative on the west side where it could connect to Howard County and Randalstown/Woodlawn areas through existing highway infrastructure. This would increase ridership for much less cost, which would increase cost effectiveness numbers. It was also determined that more expensive tunneling costs could be reduced by combining it with a highway project so that the costs could be shifted to the highway project.

16. On 30 October 2008, the plaintiff submitted a proposal to the Baltimore Regional Transportation Board (BRTB), the local Metropolitan Planning Organization, asking for feedback on my proposal. The plaintiff verified that they had in fact received my proposal and awaited their response. After waiting approximately one year, the plaintiff attended a BRTB meeting on 22 September 2009 and wanted to know the status of the proposal. The same meeting that the BRTB approved the locally preferred alternative The Baltimore Metropolitan Council (BMC) then sent a letter apologizing for losing my information. They also indicated that they would not take any action on my proposal since the BRTB had made a final decision on the Baltimore Redline alternative.

17. On 6 November 2008, the plaintiff submitted formal comments (written and oral) to the Maryland Transit Administration as part of the AA/DEIS. In January 2009 the plaintiff attempted to obtain feedback from MTA representatives that attend the Red Line Citizens Advisory Council. Mr. Henry Kay agreed to provide feedback, but took four or five months to respond. The plaintiff then addressed all of his comments and indicated that there were solutions to all of the issues he raised. He has not provided any additional commentary on the responses.

18. One of the things that the BMC did was to send a copy of the proposal to the MTA. The MTA agreed to send a response regarding my proposal, but took approx 6 months to provide the response. They responded with a letter dated 5 April 2010. The response misstated a summary of the proposal, but indicated that it was "not feasible from the standpoint of capital costs, compatibility with local land use plans, and minimization of impacts." They also indicated that the plaintiff's comments were already included in the AA/DEIS public comment record. The plaintiff contacted the MTA for additional information they had on their analysis of this proposal, but was ignored by the MTA. The plaintiff then filed a public information act request for this information.

19. The public information act did not produce any documents that demonstrated that the MTA actually evaluated my proposal. They produced some emails that the plaintiff had sent them, an analysis of a heavy rail alternative, and an evaluation of sharing the existing metro downtown tunnel with a potential light rail alternative. The heavy rail alternative is more different from my proposal than it is similar. It is approximately 30% like my proposal and 70% different. The evaluation of the existing metro tunnel reached a different conclusion with respect impacts to the metro. The heavy rail analysis indicated that lengthy shutdown of the metro was needed, while the existing metro tunnel analysis came to a different conclusion.

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

Appendix F - COMMUNITY RESPONSE (Contd.)

(# 1 John Cutonilli Contd.)

20 The plaintiff tried to understand the reasoning behind the MTA determination of the proposal being infeasible. The scoping calculations were performed by the plaintiff to determine an order of magnitude estimates of costs and indicate that the costs are not much more than the locally preferred alternative (LPA) that the MTA has chosen. The proposal would actually be easier to fund since it needs significantly less transit money and can use more plentiful highway money to finance a substantial portion of the costs.

21 The route that the proposal takes is substantially similar to the LPA. The only difference is that it uses an existing transit corridor rather than forcing the route through a dense section of the city for a small section of the route. It also implements more of the regional rail plan even though the regional rail plan does not fit within the regions fiscally constrain transportation plan for the next 20 years.

22 The impacts of the proposal would appear to be less given the extensive reuse of existing transit corridors. The quick evaluations that MTA conducted on connections to the existing metro led to differing conclusions with respect to the impact it might have. This indicates that there are different ways to connect to the existing metro and that a proper analysis would find more suitable options than those that were evaluated.

23 The plaintiff tried to take this issue up with the Baltimore Red Line Citizens Advisory Council on 9 September 2010. The Citizens Advisory Council appeared to be satisfied that the MTA responded, but did not care if there was sufficient technical basis for the response. The MTA seems to believe that the information provided through the public information act was sufficient to demonstrate was not viable.

24 The plaintiff tried to take this issue up with the FTA with a letter to Gail McFadden-Roberts (FTA contact listed on DEIS) dated 13 October 2010. He tried to follow up with an email on 17 November 2010. The plaintiff send a second letter to Brigid Hynes-Cherin (FTA Region III Administrator) dated 18 October 2011. The FTA did not respond to any of this correspondence. The plaintiff sent a third letter to Brigid Hynes-Cherin (FTA Region III Administrator) and Congressman Sarbanes dated 19 March 2013. The FTA responded that they already made a decision that the NEPA process had been followed.

25 In November and December of 2012, the Maryland Department of Legislative Services issued reports on "Financing Options for Transit Expansion" and "Transportation Revenue Options". These reports question the ability of the federal government to pay for 50% of the cost and indicate that funding will likely be capped at \$900 million total with a maximum payout of \$100 million per year. These reports question the feasibility of funding the LPA. They also present options for alternative funding, which is better with the addition of a highway project. The changes in the funding mechanisms along with changes in ridership since the AA/DEIS allow other variations of the plaintiffs proposal to be reasonable alternatives. Some of these variations were discussed in the plaintiff's FEIS comments.

26 In December 2012, the defendants released the FEIS. The FEIS contains a copy of the oral testimony submitted as part of the AA/DEIS record, but does not contain the written testimony that was provided after the oral testimony. The response incorrectly compares plaintiff's comments to the first heavy rail option. It does not actually state how expensive the plaintiff's option is. It also incorrectly assumes that all passengers need to transfer between modes. It does indicate that there are many critical considerations that are involved in the environmental impact statement.

27 On 28 January 2013, the plaintiff responded to the FEIS as part of the FEIS process. These comments indicated that the MTA did not evaluate all reasonable alternatives. It indicated that most of the MTA responses were not valid and provided an explanation why. It provided just over six single spaced pages of comments that better described the reasoning behind the plaintiffs alternative, and compares and contrasts the LPA to the plaintiffs alternative. It also provided several comments on the FEIS itself.

28 In March of 2013, the defendants released the Record of Decision for the environmental process. In this decision it indicated that the Federal Transit Administration evaluated the summary of comments for the AA/DEIS, but does not indicate that they looked at the individual comments nor does it indicate that the FEIS comments were reviewed. The defendants have never release a summary of comments that included the proposal. This includes both the DEIS and the FEIS. The plaintiff specifically mentioned this in the FEIS comments. It does not appear that the defendants even evaluated the plaintiff's comments and simply reiterated the same DEIS comments. When the defendants translated the six pages of comments, they totally ignored what was written including two comments related to the impact of the redline on traffic and on long term impacts of turning movements.

Summary

29 In conclusion, the defendants appear to have rejected the plaintiffs proposal based on other proposals that were more dissimilar than they were similar. They have also lost comments and have provided unsubstantiated responses. These responses violated 40 CFR 1503.4. The Defendants failed to insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements (40 CFR 1502.24). This prevented the defendants from rigorously exploring and objectively evaluating all reasonable alternatives including reasonable alternatives not within the jurisdiction of the lead agency. (40 CFR 1502.14). The plaintiff tried on numerous occasions to raise issues with the process and determine if sufficient technical basis could be substantiated. Issues with the public participation process (40 CFR 1506.6) contributed to the failure.

Appendix F - COMMUNITY RESPONSE (Contd.)

(# 2) Nancy Braymer

I want to bring the severe noise impacts associated with the Red Line to the attention of the Red Line Citizen's Advisory Council and ask that my comments included below including my letter to Mr. John Newton (Manager of the Environmental Planning Division for the Maryland Transit Administration) be included in the Public Comment Section of the Council's Annual Report.

The severe noise impacts associated with the Red Line are detailed in the Red Line Environmental Impact Statement. This analysis was done as part of our Section 106 comments on the adverse effects of the Red Line Project on the Canton Historic District. (I am enclosing a copy of our detailed comments for your information.)

Operating Impact on Historic Resource:

The historic Shipyard building which consists of approximately 50 residential apartments, is located within the buffer zone right on Boston Street, and is the **only** property identified in the FEIS along the entire Red Line alignment where the predicted noise level is expected to exceed the FTA severe impact criteria (see 5-133 Red Line FEIS-Volume 1 - Chapter 5: Environmental Resources, Consequences, and Mitigation.) The FTA environmental impact regulation and guidance states that before mitigation measures are considered, the project sponsor should first evaluate alternative locations/alignments to determine whether it is feasible to avoid Severe impacts altogether. If it is not practical to avoid Severe impacts by changing the location of the project, mitigation measures must be considered; Impacts in this range have the greatest adverse impact on the community."Since FTA has to determine whether the mitigation is feasible and prudent, the evaluation of specific measures should include the noise reduction potential, the cost, the effect on transit operations and maintenance, and any other relevant factors"A thorough evaluation enables FTA to make the findings required by section 5324(b) of the Federal Transit Laws and possible other statutes, such as Section 4(f) of the DOT Act or Section 106." The thorough evaluation required by FTA is missing from the FEIS.

Construction Impacts on Historic Resource:

The portal with all the vibration, noise, drilling and blasting and other construction is immediately adjacent to the historic contributing buildings of the American Can Company. The FEIS identified on the Eastern Portal Site (Boston Street just west of South Montford Avenue to the Boston Street structure over Harris Creek) the following major and prolonged construction activities: Open-cut- and cut-and-cover tunnel construction; daily delivery of equipment and concrete and removal of excavated materials; and the site would also serve as the retrieval chamber for the two gargantuan TBMs.

The enormousness of the portal in a historic neighborhood environment is just not conveyed by the angles shown on the drawings. It is basically a thick wall around 800 feet long. Apparently, the plans are to re-grade and raise the street in this area (surrounded by historic resources) to mitigate storm water surge floods into the portal. The two Maintenance of Traffic options are unacceptable and, as you are aware, the third option remains a mystery to the community.

Unfortunately, all our comments fell on deaf ears. This ill conceived project threatens our residential quality of life and the commercial viability of the many businesses in the area. Anything you could do to help bring the deficiencies of this project to the attention of the Governor and the General Assembly would be much appreciated. Thank you.

Appendix F - COMMUNITY RESPONSE (Contd.)
(# 2 Contd) Nancy Braymer

January 28, 2013

Mr. John Newton, Manager
Environmental Planning Division
Maryland Transit Administration
6 Saint Paul Street
Baltimore, Maryland 21202-1614

Re: Deficiencies in Section 106 Consultation Process for Baltimore Red Line With Opportunity to Cure

I represent Canton Square Homeowners Association (Canton Square) which is a formal Section 106 Consulting Party (CP) for the Red Line Transit Project (see your letter of June 11, 2009 officially recognizing our status). The notices provided to Canton Square of the three formal Consulting Party meetings were deficient, and our prior specific request to meet and consult on effects on historical properties with the Agency Official was essentially ignored. There was no representation from the Canton community which will be severely and adversely impacted by the Red Line until the meeting on January 23, 2013 which I and a representative from the Anchorage Homeowners Association attended. However, none of the four formal CPs from the Canton area to the best of my knowledge were provided copies of the draft Section 106 Effects Report so that we could review effects assessments in detail and provide comments. Given either this cynical or inept effort to exclude known critics of the Red Line as it dog legs through Canton, it comes as no surprise, although a profound disappointment, that the truly ludicrous conclusion was reached based on a sketchy and perfunctory analysis that the "Red Line Project would have **no adverse effect** to the Canton Historic District."

I seized the opportunity at the January 23, 2013 meeting to present to the participants the adverse effects, specifically described in the FEIS, to contributing resources in the Canton Historic District. A number of the participants were under the mistaken impression that the opposition to the Red Line in Canton had disappeared; nothing could be further from the truth as MTA is well aware given the January 16, 2013 meeting on Maintenance of Traffic Options involving over 50 infuriated Canton businesses and residents with press (TV and print) coverage.

I was instructed by Mr. Ray Moravec, who I subsequently figured out is a contractor, that I could provide written comments by January 28, 2013 via e-mail and they would be "considered." This is not consultation, and this does not fulfill the requirements of Section 106. However, I am complying out of an abundance of caution. At this point, there are two approaches to rectify these mistakes and omissions:

1. I believe I can demonstrate convincingly that the Section 106 process has been perverted to exclude a meaningful opportunity for long time critics of the Red Line, as configured in Canton, to consult even though they were officially designated as Section 106 CPs. I have absolutely no problem contacting the Council on Environmental Quality, the Department of Transportation (Headquarters) and the Environmental Protection Agency as well as our elected representatives (Senator Mikulski in particular) and of course the press. I found it truly amusing after perusing the list of attendees from the two Red Line Team Meeting Minutes that the only time it was felt necessary for an attorney to show up was at the meeting on January 23, 2013. This approach is not my preferred alternative, rather I suggest option 2.
2. Revise all applicable components of the Section 106 Effects Assessment, FEIS, and the draft 4(f) Evaluation to add the Canton Historic District (MIHP No. B-3704) as an adversely affected property. That would mean there are six adversely affected properties rather than five. The designation of Canton Historic District as an adversely affected property would have occurred had (a) Canton Square and the other CP's not been effectively foreclosed from meaningful participation and consultation in the Section 106 process; and/or (b) if the Effects Analysis prepared by a contractor adequately considered the contributing resources, delineated the truly destructive impacts on these resources specified in the FEIS itself; and provided a meaningful analysis rather than conclusions dictated by a preordained result. These changes must be made prior to the ROD by FTA.

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

Appendix F - COMMUNITY RESPONSE (Contd.) (# 2 Contd) Nancy Braymer

Since the January 18, 2013 concurrence from the Maryland Historical Trust did not have the benefit of the Canton CPs' comments nor a thoughtful and comprehensive analysis of the Effects, I **request that the Trust amend its letter and increase the adversely affected properties by one: the Canton Historic District.**

I would like to elaborate on several points since I was requested to provide comments no later than January 28, 2013. Based on my query at the meeting, I was told an e-mail to you and Mr. Moravec would suffice as a means of transmission of my comments. I would also be available to assist the contractor in revising the Effects document to provide more substantive analyses if that would be helpful:

Notice/Participation Issues:

- Attached is a copy of my July 27, 2009 letter to you concerning delineating Canton Square's Questions and Concerns re the Section 106 Process for the Red Line. You will note on Page 2 under Timing and Process, the statement that as a CP we require "...far greater specificity as to when and how we will have an adequate and meaningful opportunity to express our views" than as part of your ongoing "Public Involvement Program" (a.k.a. MTA's glossy and expensive dog and pony show). Under B 2. our letter specifically identifies St. Casimir's Church and Historic Harris Creek as historic properties concerning which we want to consult and evaluate the effects (the American Can Company and the Shipyard had previously been documented as contributing resources.) Clearly MTA failed utterly in providing us the information we requested (see page 3 of the letter) or in affording us a meaningful opportunity to participate and consult as a designated CP.
- On January 19, 2013 I contacted Mr. Moravec by e-mail, indicated I would be attending the January 23 meeting and alerted him to the problems with the address used on the Consultation Notice for Canton Square (I have retained the envelope with the erroneous address should it be needed in subsequent proceedings).
- On January 22, 2013 I contacted Mr. Moravec by e-mail again as follows:
"Hello Ray, I have been reading the material. It looks based on the attendance list in one of the attachments that there has not been any attendance/participation from any of the 4 designated Canton consulting parties which may account in part for the conclusion that the Red Line Project will have no adverse effect to the Canton Historic District. Although time is fleeting, have you been able to locate the three other Canton contacts to whom this material was sent? Thanks,
Nancy"
- I subsequently have renewed my request on several occasions with Mr. Moravec for the names and addresses of the three other Canton CP's (and even specified the name of the contacts) to ascertain if there had been comparable "address issues" as Canton Square experienced. No response containing the names and addresses has been provided to date by anyone representing MTA.
- At the January 23 meeting, I received a paper copy of the Red Line Team Meeting Minutes from the initial meeting of September 25, 2012 at which there was no representation from the Canton CPs. Page 2 of the minutes under **General Discussion** states as follows "Beth Cole of MHT asked whether the consulting parties not present at the meeting had received copies of the historic property mapping that was distributed, and if information on how to submit comments was available, GEC indicated that project mapping and comment forms could be found on the project website." In other words, they had not nor could they have if the addresses/notices used were deficient. Canton CPs had been relegated despite their specific requests to looking at the public websites for Section 106 information.
- The Trust in their ccs acknowledging additional documentation provided to the Trust by MVA had the correct names of the Canton CPs (see June 9 and July 26 letters to you from the Trust). To the best of my knowledge, the Section 106 documentation provided to the Trust was not supplied to the Canton CPs.

Appendix F - COMMUNITY RESPONSE (Contd.)

(# 2 Contd) Nancy Braymer

- I called Mr. Moravec on January 22 (to be fair he had sent an e-mail in response to mine of January 19 providing his telephone number), expressing my concern that apparently MTA had reached the shocking conclusion that the Red Line Project would have no adverse effect to the Canton Historic District. He indicated that I needed to present this at the January 23 meeting so that other Section 106 CPs would have the benefit of hearing my concerns. This I did and I believe a truly compelling case that this was an erroneous conclusion (even though I had virtually no time to review the Effects document). Fortunately Mr. Tamburrino of the Trust was helpful in providing me a link prior to the meeting. I was then told by Mr. Moravec at the meeting I needed to put my comments in writing and submit them on or before January 28 and MTA would “consider” them.
- I specifically asked Mr. Moravec in a follow-up e-mail for the e-mail addresses of the participants at the January 23 meeting so I could share these comments with them. A complete failure to respond has ensued.

In my view, the integrity of the 106 process has been compromised by the actions and omissions of MTA; the effect has been to exclude Canton CPs from meaningful consultation despite our designated CP status and specific requests; and the result is to reach an erroneous Effects conclusion in order to preclude Canton CPs from further involvement.

Sensitivity of Canton to Destruction in the Name of Progress

On at least two occasions, the historic district of Canton has been threatened by ill-conceived demolition projects that were only stopped at the 11th hour by the protections derived from the historic preservation statutes.

1. Most infamous is “The Road”. In January 1966, Baltimore City Council passed a condemnation bill for the construction of the I-83 expressway along Boston Street. In 1968, Baltimore City demolished 215 houses between Boston and Elliott Streets and Linwood and Lakewood Avenues. That same year Gloria Aull and Barbara Mikulski (now Senator) started the Southeast Council Against the Road (SCAR) to protest construction of the East-West Expressway through Canton, Fells Point, Federal Hill and other communities. Canton Square is a community of 133 townhouses built in 1987 on the site demolished for the East-West Expressway. The residents of Canton Square are particularly sensitive to this history and the need to protect this unique area from a comparable “Road” project. In this context, it should be noted:
 - a. Many of the older citizens of Canton remember the feelings of helplessness and disenfranchisement as they saw their friends and neighbors houses destroyed; this is analogous to the Road to Nowhere on the West Side. The FEIS designates Canton as a non-EJ area; tell that to the older residents in the neighborhoods of historic Canton.
 - b. It would appear that MTA/DOT has not learned from the past and seems determined to destroy a thriving neighborhood that has been built up through the efforts of many for a transit project that provides no benefits to Canton only burdens.
 - c. One of the most galling and disingenuous parts of the Effects document (see page 392; number 69; Canton Historic District) is the following “The Canton Historic District retains moderate integrity of setting within the district, although extensive recent development has occurred within its boundaries and changed the historic character of select areas.” That was necessitated on the north side of Boston Street because your predecessors demolished and cleared the historic houses for another travesty of a transportation project. This statement adds insult to injury.

Appendix F - COMMUNITY RESPONSE (Contd.)

(# 2 Contd) Nancy Braymer

2. The historic American Can Company is touched upon in the Effects write-up as a significant contributing building although the profound and disruptive impacts (see below) are treated dismissively as of no consequence. On August 31, 1988 the Advisory Council on Historic Preservation, a federal agency, notified Baltimore City that redevelopment of the historic American Can buildings "...should select a development proposal responsive to citizen input..." regarding adaptive re-use of the buildings after the Waterfront Coalition and other community residents reject demolition of the site." In October 1989, developer Michael Swerdlow abandoned plans for re-development of American Can (200,000 square feet commercial, 300 condo units) and asked the City to allow demolition of the buildings. The Advisory Council on Historic Preservation told the City that if a demolition permit is issued, the City will lose \$8.5 million UDAG earmarked for the site.

In sum, there is a proud tradition in Canton of saving this unique historic district (although homes have been lost) through a combination of Federal historic preservation statutes and local citizens' efforts. Perhaps it is this tradition that has made MTA so anxious to effectively exclude Canton CPs from meaningful participation and to ignore or trivialize the adverse impact on historic properties.

Public Outcry Against the Red Line

Community opposition to the Boston Street surface alignment and portal was early and vocal. All forms of community activism spanning the gamut from meetings with the engineers to use of the media were employed to no avail. Many of the Canton opponents support mass transit but object to the alignment that was chosen, in large part, to benefit a developer whose fortunes have undergone a significant reversal. Opponents have argued in every forum that the Boston Street dog leg would irretrievably undermine our quality of life and the enjoyment of our property. The major amenity of our community is access to the waterfront; millions have been invested in transforming Boston Street into an urban boulevard. Today Canton is a vibrant and thriving community -- one which is relatively safe and where pedestrians, joggers and bicyclists use Boston Street to access the waterfront. Expert analyses of traffic and ridership estimates were submitted all to no avail. Most distressing was the cynical effort to inject racial politics in the process and to attempt to pit the East side against the West side. The perception among Canton residents is that we are being asked to shoulder all the burdens of a project to benefit others and that our views and needs have been consistently ignored. Many Canton residents believed that the current economic climate would preclude this ill conceived project from ever coming to pass. However, with the publication of the FEIS and the January 19 meeting with the MTA engineers to discuss two equally disastrous Maintenance of Traffic options for Boston Street, the outrage has been renewed.

See <http://baltimoreguide.com/http://baltimoreguide.com/canton-residents-businesses-infuriated-by-red-line-plans/comment-page-1/#comment-29469>.

The only significant change from the DEIS phase has been to move the dreaded portal further east. This was not done in response to public concern; it was attributable to the fact that Boston Street at the original portal entrance was way too narrow. The project engineers have now moved the 800 foot portal smack into the middle of the most sensitive and significant historic sites on Boston Street.

Historic Resources

On January 29, 1980, the Canton Historic District was added to the National Register of Historic Places. Canton is also a Baltimore City Historic District and a Baltimore Certified Historic District for Tax Incentives. Specific historic properties along Boston Street have applied for and received Federal and State historic tax credits. These include two of the contributing resources most severely and adversely impacted by The Red Line: the Shipyard Apartments (2639 Boston Street) and the American Can Company as noted above. The State of Maryland has designated Boston Street as a Scenic Byway as part of the National Historic Seaport theme commemorating the War of 1812. In 1797, the U.S. F. Constellation, the first ship of the U.S. Navy, was launched at a shipyard adjacent to Boston Street.

Appendix F - COMMUNITY RESPONSE (Contd.)

(# 2 Contd) Nancy Braymer

It would appear that the contractor who prepared the effects assessment did not read the Nomination form for the Canton Historic District to be entered on the National Register of Historic Places or in fact conduct an in-depth site evaluation to assess the impacts. The Nomination form is incredibly detailed.

The overall conclusion is as follows: "The qualities which make the district distinct from its surroundings are the age and preservation of the urban architecture, the amount of successful adaptations and alterations, the established institutions and focal points of religious and cultural development and the accessibility to and views of the harbor and Patterson Park, as social and economic resources."

Specifically mentioned are contributing resources which will be adversely impacted: these include the Shipyard Apartments (a.k.a. Renneburg building); the American Can Company; the buildings of J.S. Young Company; and the Saint Casmir's Parish two church buildings.

Regarding the Shipyard Building (Renneburg building), the nomination states as follows: "On the south side of the 2600 block of Boston Street, on the part of the point that extends out into the northeast branch of the Patapsco River, are the three-to-four-story buildings of the Renneburg Company. Of all the larger industrial buildings, the three and one-half story, twenty-four bay brick buildings located at 2639 Boston Street is particularly noteworthy. This solidly constructed former chair factory is a well preserved example of post Civil War architecture. St. Casmir's church is described as one of which add to the architectural and social significance of the area, specifically "...Saint Casmir's Parish has two church buildings. The newer church, built in 1927 and located in the split section of O'Donnell Street facing Kenwood Avenue, is a limestone Renaissance Revival structure. Twin bell towers dominate the facade, and between them is situated a triple-arcaded portico with terra-cotta tile room. The older church, built in 1902, is directly behind the new church, facing Lakewood Avenue. It is a red brick, two-story structure, originally erected as a combination church and school building."

In addition although this also has implications for the draft 4(f) analysis is Historic Harris Creek. Harris Creek outfall is located on Boston Street in Canton next to the Anchorage Towers (directly in the bullseye of the Red Line). There is an ongoing Harris creek Watershed 246 project aiming at reducing stormwater runoff and trash from entering the Baltimore Harbor at this point. It drains approximately two square miles (1271 acres) of land and more than 44,000 residents live in the 20 neighborhoods of the Harris Creek watershed. It also is historic particularly in launching the Frigate Constellation and the War of 1812. A walking tour of historic Harris Creek has been developed and published; it would clearly benefit the consultant to take this walk which can be accomplished in less than one hour. It should be noted that in the 1970s the City spent over \$15 million to rebuild the Lakewood Avenue storm drain which empties right into the area of the portal.

Adverse Effects

Into this incredibly historic area and heavily traveled artery surrounded by residential/commercial properties with extensive pedestrian traffic, MTA proposes to build the portal approximately one and one-half blocks in length with high walls given that Boston Street is on a flood plain and adjacent to a salt water harbor.

Although the adverse effects to the historic properties in Canton are scattered throughout the FEIS and its appendices, some of them from the FEIS are reproduced below:

1. The historic Shipyard building which consists of approximately 50 residential apartments, I believe; is located within the buffer zone right on Boston Street; and is the only property identified in the FEIS along the entire Red Line alignment where the predicted noise level is expected to exceed the FTA severe impact criteria (see 5-133 Red Line FEIS-Volume 1 - Chapter 5: Environmental Resources, Consequences, and Mitigation.) The FTA environmental impact regulation and guidance states that before mitigation measures are considered, the project sponsor should first evaluate alternative locations/alignments to determine whether it is feasible to avoid Severe impacts altogether.

Appendix F - COMMUNITY RESPONSE (Contd.)

(# 2 Contd) Nancy Braymer

2. If it is not practical to avoid Severe impacts by changing the location of the project, mitigation measures must be considered; Impacts in this range have the greatest adverse impact on the community."Since FTA has to determine whether the mitigation is feasible and prudent, the evaluation of specific measures should include the noise reduction potential, the cost, the effect on transit operations and maintenance, and any other relevant factors"A thorough evaluation enables FTA to make the findings required by section 5324(b) of the Federal Transit Laws and possible other statutes, such as Section 4(f) of the DOT Act or Section 106." The thorough evaluation required by FTA is missing from the FEIS and even more ludicrous is that a Severe noise impact on a historic contributory resource is not considered an adverse effect.
3. The portal with all the vibration, noise, drilling and blasting and other construction is immediately adjacent to the historic contributing buildings of the American Can Company. The FEIS identified on the Eastern Portal Site (Boston Street just west of South Montford Avenue to the Boston Street structure over Harris Creek) the following major and prolonged construction activities: Open-cut- and cut-and-cover tunnel construction; daily delivery of equipment and concrete and removal of excavated materials; and the site would also serve as the retrieval chamber for the two gargantuanTBMs. The FEIS notes that at this stage of of project design, it is not feasible to provide specific proposals for each construction zone. I grant you that but how then can the determination be made that there will be no adverse effect when this level of disruptive and prolonged activity is planned?
4. The enormousness of the portal in a historic neighborhood environment is just not conveyed by the angles shown on the drawings. It is basically a thick wall around 800 feet long. Apparently, the plans are to regrade and raise the street in this area (surrounded by contributing resources) to mitigate stormwater surge floods into the portal. How much the street will have to be raised depends upon whether MTA is planning for an an old standard flood, a New York/New Jersey style superstorm Sandy or a global warming future. But we are assured there are no adverse effects.
5. Also undetermined at this stage is which of two unacceptable Maintenance of Traffic options will be pursued; both options infuriated residents of Canton at the January 19 meeting. According to the FEIS, construction of the cut-and-cover tunnel ad retained-cut structure would require the closure of Boston Street from immediately west of the intersection with Montford Avenue to immediately west of the Harris Creek culvert under Boston Street. This full closure would be necessary because of the transitioning width of the cut-and-cover tunnel walls and the placement of construction equipment needed to install the walls and temporary support of excavation with respect to remaining areas available for travel lanes. The closure is anticipated to be in place for approximately 1 year. Through traffic would be diverted away using parallel main roadways... Local traffic would be diverted using the local street network. In fact, we were told that Kenwood Avenue which passes right in front of the second of the two historic St. Casmir churches with children from the school playing outside would be the local detour. But of course according to MTA there are no adverse effects.
6. Although not directly impacting the historic built environment, for purposes of Section 4(f), 5 of the 11 publicly-owned public parks along the Red Line Preferred Alternative Study Corridor are on Boston Street and four of these five are highlighted in Bold which indicates significant parks that would be affected by the Preferred Alternative. Several of these involve a taking of a portion of the acreage of these public parks; this is not de minimus and should not be characterized as such.

Conclusion

The above is not an exhaustive list of the varied **adverse effects** of the Red Line Project on the Canton Historic District. They should suffice to demonstrate why the Canton Historic District should be identified as the sixth adversely affected property by MTA/FTA and the Trust.

Sincerely,

Nancy A. Braymer

Appendix F - COMMUNITY RESPONSE (Contd.)
(# 3) Arthur Cohen on behalf of B'more Mobile

The Case for Eastern Avenue - EXECUTIVE SUMMARY

(Full Report will be included in the web site version or at link below)

In Southeast Baltimore, the Red Line's stations should be placed along, and the alignment should go on or under, Eastern Avenue, not on Boston Street as currently planned. Why? For three basic reasons, each of which has a basis in federal transportation and environmental law:

- 1) The Eastern Avenue route would serve many more local users.
- 2) The people who live near Eastern Avenue meet the environmental justice threshold.
- 3) The people who live near Eastern Avenue need and would benefit more from the increased public transportation service and health benefits that the Red Line will provide.

Ridership

New US Census Data show that, by almost every measure, the people living around Patterson Park and in Highlandtown along or to the north of Eastern Avenue are much more transit-dependent than those living along Boston Street in the Canton and Brewers Hill area. They own fewer automobiles per household. Transit stations located there would also serve many more people than would be served by stations located along Boston Street. If the current Boston Street (Canton) route were to be replaced by the Eastern Avenue route, the total number of persons potentially served would increase from 8,700 to a range from 14,000 to 28,000 - that is, the Eastern Avenue route would serve 5,300 to 19,300 more local users.

Environmental Justice According to the US Census, both significantly more and a higher percentage of Black, Hispanic, or low-income persons are living around Patterson Park and in Highlandtown, than are living in the Canton and Brewers Hill Area. The federal environmental justice threshold is met by the people living in the Patterson Park/Highlandtown area. Environmental justice requires that public transportation service not be denied to minority and lower-income persons relative to their neighbors or the general population.

Service Equity and Health Equity

Routing the Red Line along Boston Street would adversely affect service equity for the persons living around Patterson Park and in Highlandtown. The two stations in Canton and at Canton Crossing would be much more difficult for them to reach on foot than would be the two stations located along Eastern Avenue, at both ends of Patterson Park. The latest Baltimore City Health Department data show that residents of the area to the east and north of Patterson Park have health indicators far below those of persons living in the Canton and Highlandtown areas, in fact, some of the lowest levels in the entire city.

Public transit improvements can improve health outcomes and reduce healthcare costs. Regular daily walking to and from public transit stops can contribute to personal health, and counteract the sedentary lifestyle so common for Americans today. Furthermore, many physically and economically disadvantaged people depend on public transportation to access medical services and to obtain healthy, affordable food. Locating the stations along Eastern Avenue instead of Boston Street would produce positive health outcomes for many more of Southeast Baltimore's residents.

Eastern Avenue - A Fairer Route with More Productive Stations There are two alternatives along Eastern Avenue: street-level (surface) or by tunnel. The surface route would proceed eastbound and westbound along the southern edge of Patterson Park until Ellwood Avenue, at which location it would turn north along the eastern edge of the Park. It would then proceed eastward along Bank Street to the Highlandtown/Greektown Station, then west from that station along Gough Street to rejoin Ellwood. The tunnel route would proceed entirely under Eastern Avenue south of Patterson Park and

under Eastern through Highlandtown to the Highlandtown/Greektown Station. Although a tunnel route would have many advantages over a surface route, it would be much more costly. However, the total cost, even for a tunnel, would be under the \$2 billion maximum established by MTA for financial feasibility. If this Case for Eastern Avenue is found to be persuasive, government action and strong community advocacy will still be required to replace the currently planned Canton Route and stations with the more suitable Eastern Avenue Route and stations. Communities living around Patterson Park and in Southeast Baltimore will have to come together in a coalition to demand and push for such a change. Such community efforts have been effective at producing significant changes in transit plans in other metropolitan areas, and there is every reason to believe that they can succeed here in Southeast Baltimore with the Red Line and "do it right."

<http://www.bmoremobile.org/>

For additional information including future meeting of the Red Line Citizens' Advisory Council (CAC), visit the Red Line CAC web page at: <http://www.baltimoreredline.com/project-information/citizens-advisory-council>

Appendix F - COMMUNITY RESPONSE (Contd.)
(#4)

Revised Comment on Red Line Project - 10 - 29 May 2013 Draft

provided by
JOINT OPEN INFRASTRUCTURE SUBCOMMITTEE

corridor. After implementation of the bus operations plan, the Route 15 and Route 40 lines will cease to be through lines. Route 15 becomes three lines: 15B, 15E, and 15W. Route 40 becomes two lines: 40L and 40X. In both cases, what was a through ride requires several connections, and many bus-to-bus connections are lost as described in the following table.

Route	Bus-to-Bus Connections Lost Bus-to-Rail Connections Lost			Number of Connections Lost	Number of Connections Gained
	West	Downtown	East		
11 Towson - Harbor East Station	None	None	13 Canton 13 Fells Point	2	0
15W CMS - Rosemont Station	1,51,	3,3X,5,5X,7,8,11,19, 19X,27,35,36,qb40, qb46,qb48,61,64, 64X 120, 150,160,310,320, 410,411,420, CCC Green, CCC Purple, Light Rail, Metro Subway	13,21, 22,33, 44,50, 55,58	40	1 (10W)
15B Walbrook Junction - Bayview	20,40, 44,57, 77	None	33,44, 50,55, 58	10	2 (10W,24)
15E Popperton - Perry Hall	13,16, 20,40, 44,51, 57,77, 97	None	None	9	0
150 Downtown - Columbia	None	1,3,3X,5,5X,7,8,10, 10X,11,15,15X,19, 19X,20,23,27,30,35, 36,qb40,qb46,qb47, qb48,61,64,64X,91, 120,160,310,320, 410, 411,420, Light Rail, Metro Subway, CCC Green, CCC Purple.	None	39	0
				100	3

Appendix F - COMMUNITY RESPONSE (Contd.)
(# 5) 46th Legislative District Delegation

SENATOR BILL FERGUSON



THE MARYLAND GENERAL ASSEMBLY
46TH LEGISLATIVE DISTRICT
BALTIMORE CITY

DELEGATE PETER A. HAMMEN
DELEGATE LUKE CLIPPINGER
DELEGATE BRIAN K. MCHALE

August 28, 2013

The Honorable Martin O'Malley
Governor of Maryland
Office of the Governor
100 State Circle
Annapolis, MD 21401

Mr. Governor:

As you know, the development of a comprehensive, efficient and effective mass transit system is essential to the City of Baltimore's long---term sustainability, prosperity and relevance. We voted in favor of the Administration's Transportation Infrastructure Investment Act of 2013 because we recognize the long---term benefit that effective mass transit provides our City. We agree that Baltimore City and the State of Maryland *must* invest in a 21st Century mass transit system solution. We also unequivocally believe that any 21st Century transportation investment in greater Baltimore *must* be comprehensive, reliable and fiscally feasible to be effective. We write to you, however, because the current design and construction plans for the Maryland Transit Administration's (MTA) Red Line project have strayed from this important standard of effectiveness. We request your Administration's leadership engage with us and our constituents to save the Red Line and realize its potential, and this opportunity, to truly transform our City for the better.

By way of background, and as you are well aware, Baltimore's currently disconnected and unreliable set of mass transit offerings – via bus, light rail, and subway – hamper our City's ability to attract and retain families and businesses. Our City's piecemeal transit system directly contributes to patchwork economic development, intractable quality of life frustrations for neighborhoods and persistently segregated communities. While complex, these problems are fixable.

Over the last decade, the MTA's Red Line project has been promoted as a regional solution to these mass transit challenges. As one component of the Baltimore Region Rail System Plan of 2002, the Red Line project, at least as originally conceived, could have met this goal. Today, however, the compromised and increasingly expensive underground Red Line light rail project falls short of this promise. The current iteration of the Red Line project threatens to impede future progress on one of our City's most important and solvable public sector challenges. Simply put, by moving forward with the Red Line project as currently proposed, the MTA and Baltimore City will squander an opportunity to truly invest in a comprehensive mass transit solution for Baltimore, and jeopardize the City's ability to create a comprehensive and effective mass transit option for our City's future residents. To this end, we offer the following thoughts:

Appendix F - COMMUNITY RESPONSE (Contd.)
(# 4 Contd.) 46th Legislative District Delegation

First, the cost to construct the Red Line has risen significantly, while both the projected ridership has not kept pace, and the speed of the service has fallen. In 2008, the MTA projected the Red Line to cost \$1.631 billion and serve 42,100 riders per day at average speeds of 23 – 25 miles per hour. By 2011, the Red Line project capital costs escalated to \$2.219 billion, and estimated that the project would serve 57,000 riders per day with average speeds of 22---23 miles per hour. Today, just 5 years since initial estimates, the MTA now projects that the Red Line will cost at least \$2.574 billion to build – nearly \$1 billion over initially projected costs without a single shovel in the ground – and serve 55,000 riders per day but at an average speed of roughly 18.8 miles per hour – thereby traveling nearly 25% more slowly along the line than initially designed.

This less efficient and more costly system comes with the concomitant elimination of several critical transit stops along the proposed Red Line to attempt to limit escalating costs --- most notably, a station that would have provided direct access to the University of Maryland campus in downtown Baltimore. The removal of these stations, while not stemming the overall project costs, has made the Red Line a significantly less comprehensive project than initially envisioned. 1

Second, under the revised projections, Maryland and Baltimore City taxpayers will absorb an unprecedented and unbalanced share of the line's construction costs. Originally, the MTA anticipated a 50/50 cost share with the federal government --- 50% paid for through the FTA's New Starts grant program and 50% paid for through Maryland's Transportation Trust Fund. The FTA's New Starts grant program, though, is fiercely competitive, and federal funding support for the Red Line at any level is most certainly not guaranteed. Today, assuming that the MTA reaches a Full Funding Grant Agreement with the FTA (far from a certainty), the New Starts grant program will *possibly* provide a *maximum* of \$900 million (certainly not the MTA's forecasted \$1.25 billion in federal funds) for the \$2.6 billion Red Line. Thus, Maryland and Baltimore City taxpayers would be required to cover *at least* \$1.7 billion in remaining capital costs, not including any unexpected project overage costs. As a result, it is unlikely that Baltimore City will receive additional mass transit investment by the State of Maryland for decades.

Third, beyond the threat of the escalating costs, the project will disrupt stable communities while bypassing other nearby communities that are clearly in need of transit oriented development. Well---coordinated and well--executed transit systems can transform emerging neighborhoods that are ripe for a stimulus with a potential to drive increased neighborhood investment. In Baltimore City, an effective mass transit investment both would facilitate targeted transit---oriented development through the entire line, and connect developed areas with more efficient mass transit options. But the MTA has chosen to run the Red Line's underground tunnel through a part of the City least in need of the benefits that can come through potential transit oriented development. As aligned today, the Red Line's mode and alignment choices undermine the potential for facilitating desired economic development in neighborhoods such as Washington Hill, Pleasant View Gardens, Upper Fells Point, Fells Prospect, McElderry Park, Patterson Park, Patterson Place, Baltimore---Linwood, Baltimore Highlands, and Highlandtown (see map in Appendix 1). As distressing, to inexorably limit project costs in *one instance*, the MTA has chosen to end the disruptive and expensive underground tunnel in the middle of Boston Street on the waterfront, directly in the midst of one of the most congested and developed corridors in the entire City of Baltimore. The Red Line thereby circumvents communities that could most benefit from a transit oriented economic investment, and disrupts a developed community where increased transit ridership is the least fertile according to the MTA's own ridership analysis and projections. Thus,

Appendix F - COMMUNITY RESPONSE (Contd.)
(# 4 Contd.) 46th Legislative District Delegation

Fourth, the \$1.2 billion underground tunnel east of Downtown Baltimore, and through Southeast Baltimore neighborhoods, is both a driver of the Red Line's escalating costs and the primary source of excessive disruption to our neighborhoods. Other U.S. cities have recognized the prohibitive cost of underground tunnels in an urban core, and, instead, employed transit systems that are both cost effective and a better match to urban infrastructure. Consider Seattle, where a light rail expansion project was deemed too expensive, and where in its place a rapid streetcar system is nearly finished construction today. Consider Washington, D.C.'s downtown modern rapid streetcar project that includes 22 miles of streetcar lines at an estimated cost of roughly \$500 million. Compare that to Baltimore's 14.1 mile, partially underground light rail Red Line that will cost at least \$2.6 billion to build --- *two---thirds the transit for five times the cost*. More cost effective and infrastructure---appropriate rapid streetcar projects are in final stages of design or are under construction today in New Orleans, Salt Lake City, Cincinnati, Dallas, Detroit, Kansas City, Los Angeles, St. Louis, Atlanta, Tucson, and Charlotte. As we have discussed these comparable projects in other U.S. cities with various regional officials in Baltimore, far too often we have heard justifications summarized best as: "The Red Line is all we've got going, and Baltimore has to take what we can get." This justification assumes unacceptably low expectations for our City, our State and for our region. We can and must do better.

Despite all of these current concerns, the Red Line's promise is salvageable and should be saved. Baltimore can still make purposeful and cost effective adjustments to the Red Line without jeopardizing the project. Again, let us be abundantly clear: the Red Line can still be a project that positively transforms Baltimore City's mass transit future. But to achieve this objective, the MTA must develop a more effective and modern plan for the Red Line in East and Southeast Baltimore.

For these reasons, as the elected representatives of Maryland's 46th Legislative District, we implore your Administration to engage with MTA and City officials overseeing the Red Line project to ensure that this important transportation investment truly provides our City's residents the mass transit opportunity that our residents deserve. This project has reached a critical juncture, and as we have noted above, we have grave concerns about the project's financial feasibility and overall effectiveness upon completion. We most certainly can make the Red Line project work for all communities along the Red Line corridor. However, it will require immediate attention by your Administration to ensure that the Red Line truly serves as a once in a generation transportation investment that genuinely stimulates Baltimore City's future.

Sincerely,

Bill Ferguson, Senator, District 46

Luke Clippinger, Delegate, District 46
Peter A. Hammen, Delegate, District 46
Brian K. McHale, Delegate, District 46

¹ As a comparison, in the 2008 review of mode and alignment alternatives for the Red Line project, the MTA firmly rejected a more efficient, underground heavy rail alternative that would have traveled an average of 31 miles per hour along the entire line. The MTA premised this rejection of the more efficient alternative on excessive construction costs, then estimated to be \$2.383 billion, and which would have necessitated a daily ridership of at least 90,000 to be cost effective under Federal Transit Administration (FTA) guidelines. Today's compromised project, however, is at least \$200 million more expensive to build than the more efficient heavy rail alternative and purports to serve at least 35,000 less riders per day. According to the MTA's own project analysis, the Red Line has become prohibitively expensive, remarkably less comprehensive and increasingly disruptive.