Executive Summary

The Maryland Transportation Authority (MDTA) and the Baltimore City Department of Transportation (BCDOT), in coordination with the Federal Highway Administration (FHWA), are studying a suite of improvements to Interstate 95 (I-95) ramps and other nearby transportation facilities to support ongoing and planned redevelopment of the Port Covington peninsula in south Baltimore. These improvements are collectively known as the I-95 Access Improvements from Caton Avenue to the Fort McHenry Tunnel (I-95 Access Improvements).

This Environmental Assessment (EA) has been prepared to evaluate the potential impacts of the I-95 Access Improvements on the human, natural, and built environment in compliance with NEPA, the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), FHWA's Environmental Impact and Related Procedures (23 CFR 771), and other federal, state and local requirements. MDTA and BCDOT are committed to achieving the transportation, economic, and social goals outlined below in an environmentally sensitive manner.

1.0: PURPOSE AND NEED

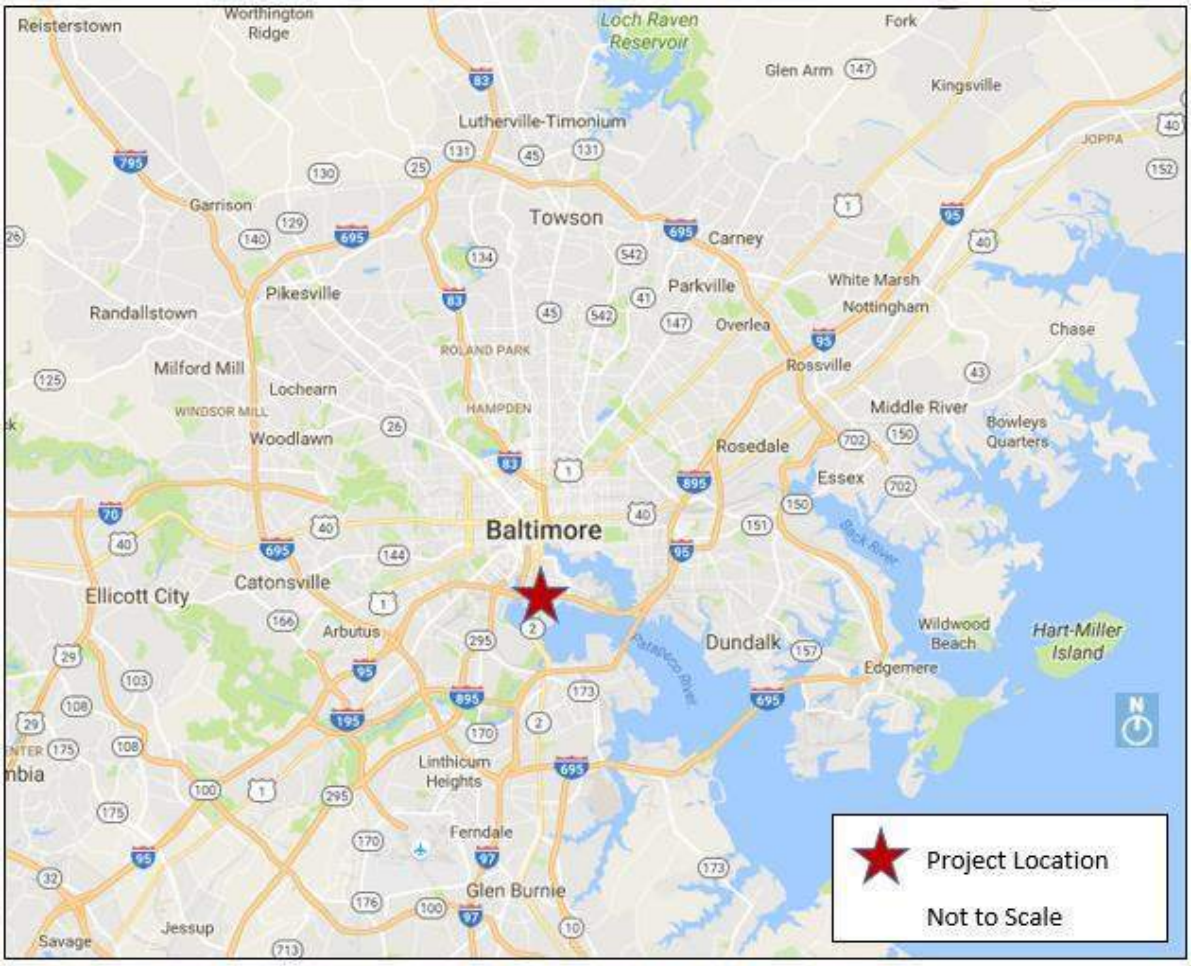
The project is located in south-central Baltimore City. It is shown on Figure ES-1. Figure ES-2 depicts the study limits which extend from Caton Avenue to the west to Keith Avenue to the east. The study corridor includes approximately seven miles of I-95 and sections of Hanover Street, McComas Street and Key Highway.

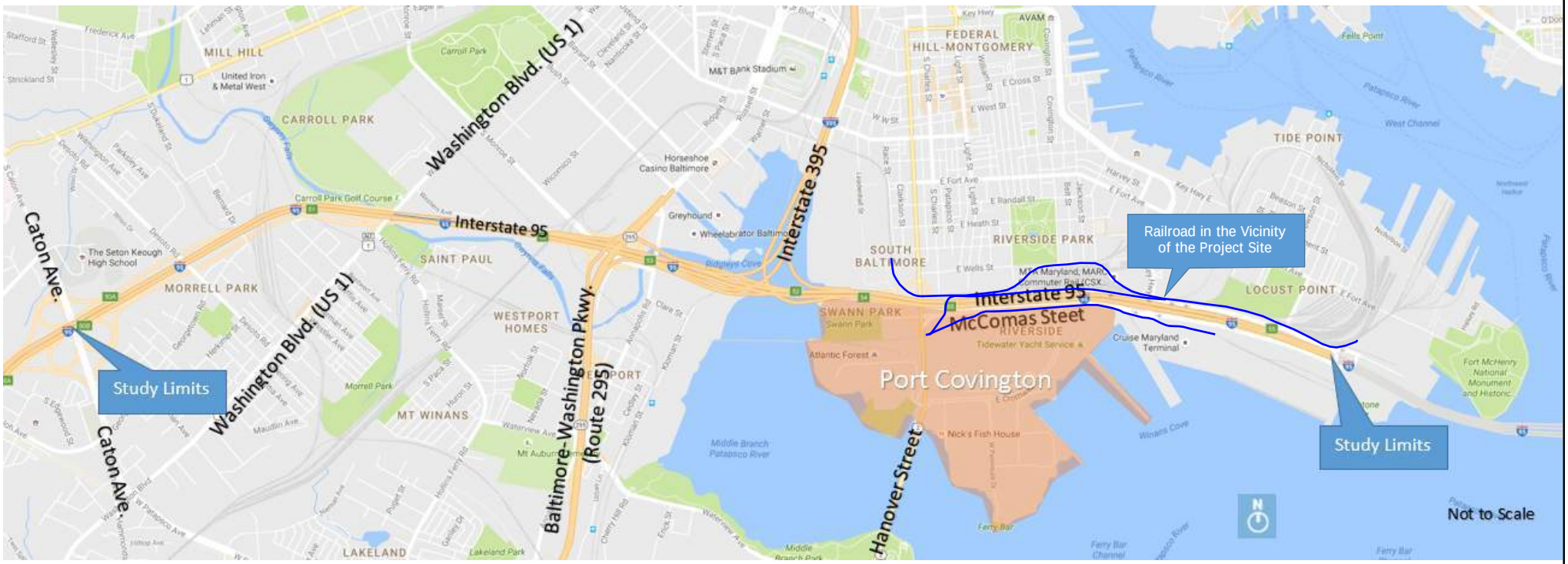
The purpose of the I-95 Access Improvements project is to accommodate forecasted increased transportation demand on I-95 and the surrounding transportation network by minimizing effects on mobility and safety, as well as enhancing multi-modal connections to the Port Covington peninsula.

The proposed action addresses the following needs, which are described in detail in Chapter 1:

1. Ongoing and planned development in the Port Covington peninsula will result in **increased transportation demand** to Port Covington resulting in vehicular trips that are projected to be more than double today's volumes to and from the site on I-95, I-395, and Hanover Street by 2040.
2. **Existing capacity and roadway geometry** are **not adequate** to meet projected traffic demands, with operations on most ramp segments and links within the study corridor projected to reach unacceptable Levels of Service (LOS) by 2040.
3. Existing public infrastructure in and around the peninsula cannot efficiently support the City's approved **economic development and land use changes** at Port Covington.
4. The **limited multi-modal connections** around and across I-95 between the surrounding neighborhoods and the Port Covington peninsula are insufficient to support future planned growth on the peninsula.

Figure 1-1: Project Location





dot DEPARTMENT OF TRANSPORTATION BALTIMORE CITY

Maryland Transportation Authority

I-95 ACCESS IMPROVEMENTS
FIGURE ES-2

STUDY LIMITS

MARYLAND TRANSPORTATION AUTHORITY

BALTIMORE CITY DOT

2.0: THE PROPOSED PROJECT AND ALTERNATIVES CONSIDERED

To simplify a complex project, the improvements under consideration were broken down into seven elements, with several options developed for each. These were combined into four distinct alternatives for analysis purposes – Alternative 1, the No Build Alternative, and three Build Alternatives. These four alternatives were analyzed to determine how well they meet the project's stated Purpose and Need and the effects each has on future traffic operations both on I-95 and on surface streets.

The four initial alternatives evolved from an iterative process involving engineering, planning, and environmental considerations; review and comment; refinement and revision; and eventual screening of the alternatives. Key performance measures include travel time, vehicle throughput, queuing, and level of service. Each element's options were also compared to identify the highest performing ones. Project planning and design criteria were developed in coordination with MDTA, BCDOT, and the community.

The highest performing options from each alternative were combined to create a fourth build alternative, Alternative 5, as MDTA and BCDOT believed that combining the most optimal options, or variations of options, for each element could improve upon overall results. The traffic analysis findings indicate Alternative 5 performs the best – therefore is was identified by MDTA and BCDOT as their Recommended Preferred Alternative. Table ES-1 lists the elements and improvements in the Recommended Preferred Alternative. The capital costs for the complete Recommended Preferred Alternative are estimated to be between $450 million and $495 million. Construction is anticipated to be in four phases, to minimize disruption to existing traffic.

Table ES-1: Recommended Preferred Alternative

Designation	Element	Locations
A	I-95 Northbound Off-Ramps	• Exit 52, new ramp from Russell Street off-ramp • Exit 53 interchange, new spur from I-395 southbound ramp • Exit 54, remove ramp from I-95 northbound to Hanover Street southbound • Exit 55, reconstruct ramp from I-95 northbound to McComas Street
B	I-95 Northbound On-Ramps	• New ramp from McComas Street to I-95 northbound
C	I-95 Southbound Off-Ramps	• New ramp from I-95 southbound to McComas Street westbound
D	I-95 Southbound On-Ramps	• Realign ramp from McComas Street westbound to I-95 southbound
E	Hanover Street	• Reconstruction from CSX Bridge to McComas Street to accommodate grading for new development
F	McComas Street and Key Highway	• Realign McComas Street • Widen Key Highway between McHenry Row and McComas Street

Designation	Element	Locations
G	Pedestrian and Bicycle Connections	• New sidewalks along Hanover Street and realigned McComas Street • Shared use path along Key Highway • Shared-Use path linking South Baltimore to Port Covington peninsula

3.0: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter summarizes the findings of the environmental analyses performed to determine the potential for adverse impacts in the following categories: transportation, land use, socio-economics, neighborhoods, community facilities, parks, environmental justice, visual character, noise, air quality, natural resources, cultural resources, contaminated materials, utilities, indirect & cumulative effects, and construction effects. Construction impacts for each resource are considered in the construction effects section. Only the No Build and Recommended Preferred Alternative are discussed. With the exception of the utilities and construction effects sections, each is a summary of a detailed technical report included as an appendix to this EA.

3.1 Transportation

This section of the EA summarizes the detailed information presented in Appendix B, "Traffic Analysis Technical Report." Roadway capacity and traffic operations analyses were conducted for the freeway sections, ramp junctions, weaving segments, and intersections within the study area. The evaluation of freeway operations confirm that the Recommended Preferred Alternative improves the overall mobility (ease of movement) along the interstate when compared to the No Build condition. The evaluation of street intersections confirms that the majority operate at improved or similar levels of service under the Recommended Preferred Alternative when compared to the No Build Alternative.

The No Build Alternative would result in some increase in transit, bicycle and pedestrian, and/or parking facilities within the study area, but only as part of the proposed development and only within the new street grid of the Master Plan. It does not provide for additional services or facilities to accommodate travel into or out of the peninsula.

The Recommended Preferred Alternative is not anticipated to result in any permanent adverse effects on traffic or transit within the study area. It provides space for a future mass transit corridor as part of the widening and relocation of McComas Street. In addition, it includes pedestrian and bicycle connections to Federal Hill and Locust Point on the north side of I-95 and CSX. Bicycle and pedestrian safety, connectivity, and mobility within Port Covington and the South Baltimore communities would be improved by the construction of the Recommended Preferred Alternative. However, construction of the Recommended Preferred Alternative could temporarily affect bicycle and pedestrian facilities and activities, and may include temporary sidewalk and trail route detours. Vehicle parking spaces could be lost or temporarily unavailable during a portion of the construction phase. These spaces would be available or relocated after construction is complete.

As there are no permanent adverse effects to traffic or transit anticipated for the Recommended Preferred Alternative, mitigation is not warranted.

3.2 Land Use

This section focuses on the Recommended Preferred Alternative's potential effects on land use by comparing it to the No Build conditions, and evaluates the consistency of the Recommended Preferred Alternative with area master plans and the Smart Growth Act of 1997.

The Port Covington Master Plan and other adjacent community master plans will dictate future development in the study area. The No Build Alternative may slow the pace of this development due to inadequate infrastructure. The goals of the current plans may not be realized, or the pace of development may be slower than anticipated, under the No Build scenario as the existing infrastructure is not adequate to handle the expected increase in transportation demand once the Master Plan is fully built. Moreover, the No Build Alternative would not provide the transportation network connectivity to support this type of growth, thereby causing increased strain on the already congested transportation network.

The Recommended Preferred Alternative is consistent with the goals of the local area master plans as it addresses the constrained connections between the Port Covington peninsula, the surrounding neighborhoods and other parts of Baltimore; mitigates the forecasted congestion issues; accommodates the projected increased traffic volumes; and provides local and regional access to new job opportunities and amenities.

The implementation of the Recommended Preferred Alternative would result in a combined total of 13.2 acres of right-of-way acquisitions, all from industrial properties. Partial acquisitions account for 7.0 acres, while the remaining 6.2 acres is the total acquisition of one industrial property. The partial acquisitions would not constitute notable changes in land use, as the overall use of the respective properties would not be affected by the acquisition. The full acquisition would not, in itself, represent a substantial change to the overall land use pattern in the study area; moreover, the change in land use would be limited to that property and therefore not be expected to affect the uses of neighboring properties.

Property acquisition activities, including relocations, will be performed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act), as amended and all applicable Maryland State laws that establish the process through which MDTA may acquire real property through a negotiated purchase or through condemnation.

3.3 Socio-Economics, Neighborhoods and Environmental Justice

This section summarizes the existing demographics, neighborhoods, community facilities and services surrounding the study area and discusses any impacts to those resources that may occur. A discussion of the likelihood that the Recommended Preferred Alternative would have a disproportionate adverse effect on Environmental Justice Populations is also included. Further details are found in Appendix C, "Socio-Economic Technical Report."

Neighborhoods and Community Facilities

The No Build and Recommended Preferred Alternative would not impede interactions between residents or neighborhood cohesiveness. Transit dependent populations within the study area would maintain access to transit routes throughout the study area. However, traffic congestion under the No Build alternative could cause delays in emergency response services. These delays in service are not anticipated under the Recommended Preferred Alternative due to the implementation of improved signalization, enhanced ramp configurations and moderate improvement in levels of service (LOS).

No long-term effects to operation and function of community facilities and services are anticipated. The No Build Alternative and Recommended Preferred Alternative are not anticipated to result in any permanent impacts to transit, bike and pedestrian, and/or water taxi routes/facilities within the study area.

The construction of a new pedestrian and bicycle path to connect Port Covington to south Baltimore neighborhoods under the Recommended Preferred Alternative is considered a benefit to the community. This new path is not considered under the No Build Alternative.

Economic Effects

The No Build Alternative would not mitigate future increases in traffic and therefore could result in increased commute times on I-95 or the local roadway system. The resulting decrease in mobility could limit future increases in regional economic growth by limiting future redevelopment opportunities in the area.

The Recommended Preferred Alternative would support the region's planned economic activities by providing better access to new jobs generated by the proposed redevelopment of the Port Covington peninsula through increased mobility.

Potential Effects on Environmental Justice (EJ) Populations

As a tool for evaluating the proportionality of impacts and benefits, this analysis identifies "EJ areas" and "non-EJ areas" within the study area. An "EJ area" was defined to include any census block group in which the minority or low-income population meets either of the following threshold:

- the minority or low-income population in the Census Block Group exceeds 50%, or
- the percentage of a minority or low-income population in the affected area is "meaningfully greater" than the percentage of minority population in the general population.

Property Acquisition -- The No Build Alternative would not require any business displacements or property acquisitions. The Recommended Preferred Alternative would not require any residential property acquisitions. Two partial acquisitions of industrial properties will occur in an EJ community under the Recommended Preferred Alternative. These two partial acquisitions account for less than an acre of land in total and would not impact the business operations or structural components of either business. The affected properties are within or immediately adjacent to transportation rights-of-way.

Community and Neighborhood Cohesion – The No Build Alternative would not change the day to day neighborhood quality of life in EJ communities. The Recommended Preferred Alternative would improve existing community cohesion and encourage more pedestrian and bicycle travel in the study area. In addition, the transportation network under the Recommended Preferred Alternative would support the redevelopment efforts now occurring in the study area neighborhoods, including new housing (market rate and affordable), commercial development (employment and retail) and recreational opportunities. The increased access to entertainment, recreation spaces and connections to adjacent neighborhoods within and beyond the study area is consistent with the community revitalization and economic development goal expressed in the master plans for several EJ communities and are considered a benefit to them.

Transportation – The Recommended Preferred Alternative would not cause permanent impacts to transportation facilities or transit services in EJ communities. In fact, the construction of a new bicycle and pedestrian path, under the Recommended Preferred Alternative, enhances existing connections from EJ neighborhoods north and south of study area.

Visual Character – Neither the No Build nor the Recommended Preferred Alternative are anticipated to have adverse effects on the visual character of the study area, therefore no disproportionate impacts to environmental justice populations are anticipated.

Community Facilities and Services – The construction and operation of the Recommended Preferred Alternative would not cause permanent impacts to community facilities and services in EJ communities.

Air Quality – The construction and operation of the Recommended Preferred Alternative would not cause permanent air quality impacts to EJ communities.

Noise -- The construction and operation of the Recommended Preferred Alternative would not cause permanent noise impacts to EJ communities.

Contaminated Materials – During construction of the project, contaminated soil and materials would be removed from affected areas. Additional investigations would be conducted to further define the type and extent of contamination as well as short-term and long-term remediation requirements to protect public health and worker safety. The project would not result in direct effects to the general population, including EJ populations.

Construction – Potential construction period impacts include the effects of mobile source emissions, fugitive dust air, noise, light pollution and a delay in transit service for transit dependent populations. The potential impacts are short-term in nature and would not result in any permanent effects to EJ populations.

The Recommended Preferred Alternative as a whole would not cause “disproportionately high and adverse effects” on EJ populations and mitigation is not warranted.

3.4 Visual Character

Seven visually-sensitive resources were identified within the viewshed, and twelve viewpoints from within them were selected for evaluation.

No new visual impacts related to the project and its components would occur under the No Build alternative.

The Recommended Preferred Alternative would not be visible from seven of the twelve viewpoints and only the reconstructed ramps over the Middle Branch of the Patapsco River would be visible in the extreme distance (approximately one mile) from the four Middle Branch Park viewpoints. The project infrastructure would also be visible from parts of the relocated Swann Park. Because the Recommended Preferred Alternative would generally be reconstruction of the existing highway infrastructure in approximately the same locations and with similar heights, vertical profile and appearance, the new alignments, ramps, and interchanges would generally resemble existing conditions. As such the visual character of the Recommended Preferred Alternative would be similar to the existing highway infrastructure and its contribution to view corridors would also be similar.

No adverse impacts to visual character are anticipated, and mitigation is not warranted.

3.5 Noise

Noise monitoring was performed at nine locations during peak traffic conditions. Noise modeling using the Federal Highway Administration's Traffic Noise Model (FHWA TNM 2.5), was conducted at additional locations to better understand the existing noise environment and to determine how the proposed improvements would affect future noise levels throughout the project study area.

Traffic noise was predicted for the Existing (2016) condition and peak Future Build (2040) condition at selected sensitive receptor locations using FHWA's Traffic Noise Model (TNM) version 2.5. Utilizing Existing and Future Build year traffic volumes, vehicle composition, and speeds assigned to the existing and proposed roadways, potential impacts at affected study area receptors were assessed. For future conditions, the model also accounted for proposed project improvements and application of 2040 traffic data. Existing and Future Build noise levels were then predicted throughout the study area with the improvements in place and in use.

The Recommended Preferred Alternative would not have a significant impact on noise in the community. Only one noise sensitive area showed a predicted increase in noise large enough to warrant the consideration of noise abatement. Because specific design plans for the Port Covington Redevelopment project have not been advanced, an assessment of abatement measures for specific buildings cannot be properly considered at this time.

3.6 Air Quality

This section documents the potential effects to air quality as a result of the construction and operation of the proposed I-95 Access Improvements project. It summarizes the detailed information in Appendix E, "Air Quality Technical Report."

Based on the traffic analysis, the amount of diesel vehicles and VMT in the study area is not expected to significantly increase from the No Build Alternative to the Recommended Preferred Alternative.

The Recommended Preferred Alternative is not predicted to increase emissions compared to the No Build Alternative, nor cause or exacerbate a violation of the NAAQS; this takes into account the pollutants for which the area is in nonattainment or maintenance, including ozone and its precursor molecules, fine particulate matter, and carbon monoxide. The project is not expected to measurably increase MSAT or greenhouse gas emissions over the No Build Alternative. No long-term mitigation measures are proposed.

No adverse impacts to air quality are anticipated, and mitigation is not warranted.

3.7 Natural Resources

The Recommended Preferred Alternative is not anticipated to have significant impacts to water quality, groundwater resources, or aquatic species. Impacts to floodplain, floodway and wetlands would result from the placement of piers. It would also affect 11.1 acres of Habitat Protection Areas and 44.5 acres of Critical Area. Best Management Practices and careful coordination with resource agencies would take place during final design and construction to minimize impacts to the extent practicable.

There are no documented rare, threatened, or endangered species within the study area, even so, best management practices would be employed during and after construction to reduce or eliminate potential impacts to any species during construction and operation or the Recommended Preferred Alternative. Impacts to wildlife are also anticipated to be minor. Soil disturbances would occur throughout the limits of disturbance during construction, including cutting, filling and grading. Roughly 85,000 cubic yards of fill is anticipated and would be considered a permanent impact. To minimize potential effects from soil disturbances, proper slope and soil stabilization techniques would be used in work areas, both during and after construction, to prevent potential sedimentation of nearby waterways. In addition, approximately 8.7 acres of vegetative community would be removed during construction. Best management practices would be used to minimize impacts.

3.8 Cultural Resources

Five architectural historic properties were identified within the Area of Potential Effect (APE). These include one NRHP listed resource (Riverside Historic District) and two NRHP eligible resources (Westport Historic District and Spring Garden Bridge Coordination with MHT provided a No Adverse Effect determination for all of these resources, therefore mitigation is not warranted.

No known archeological sites have been identified in the APE, but Baltimore Center for Urban Archeology's survey demonstrated that the Port Covington Rail Terminal was constructed on fill, with potential for archeological sites at a subsurface depth of 8-10 feet. It contains the remnants of a mid- to late nineteenth-century industrial building that were identified during machine-excavated trenches that were 10-feet wide and up to 12-feet deep. MDTA plans additional geoarcheological investigations to confirm.

3.9 Contaminated Materials

An Initial Environmental Site Assessment (ESA) was performed as part of this EA. The full ESA is included as Appendix I, "Initial Environmental Site Assessment."

For the purpose of this assessment, only parcels or portions of parcels within the proposed construction limits of disturbance (LOD) were researched with regards to parcel ownership, historical use/operations, and regulatory case files. The ESA identifies potential recognized environmental conditions (RECs), controlled RECs (CRECs) and historical RECs (HRECs) associated with those parcels anticipated to be impacted by the proposed LOD.

Probable consequences associated with the construction and operation of the Recommended Preferred Alternative include the potential for temporary exposures to contaminants present in soil and/or groundwater from excavations and other land disturbing activities. Prior environmental data for the parcels or portions of parcels within the proposed construction LOD do not indicate that the soils, if disturbed and excavated, would be characterized as hazardous.

It is recommended under the Recommended Preferred Alternative that parcels, where historic environmental data is not available, be further evaluated to determine if additional environmental management plans are required during future earth disturbances or construction activities. Specifically, a Phase II ESA should be performed and should focus on known parcel-specific contaminants of concern, contaminants potentially present as a result of the historical parcel uses, SVOCs including PAHs, VOCs, metals and petroleum hydrocarbons for the former railyard areas, petroleum-related compounds in the areas of the former underground storage tanks (USTs), and common urban contaminants throughout all historically developed areas of the proposed construction LOD.

Compliance with the existing requirements of the Port Covington Contamination Site Management Plan (CSMP), and the conditions of the Certificates of Completion will minimize potential impacts during construction. Future exposures would be addressed through the requirements for cap repair and monitoring. Similar mitigation measures, environmental monitoring and materials management would likely be required to address any additional contamination identified as a result of the listed RECs.

3.10 Utilities

The LOD of the Recommended Preferred Alternative is located within a highly urbanized environment, supported by a complex utility infrastructure. Existing utilities include overhead and underground electrical distribution and service lines, underground lighting and signal, gas, communication, water, sanitary sewer, and storm sewers. BGE's Gould Street facility is located immediately south of I-95 off McComas Street, on the east side of the peninsula and operates as a back-up power plant for the area.

It is anticipated that under the No-Build Alternative the developer of the Port Covington Master Plan will remove or relocate utilities, as appropriate, as the peninsula is cleared for the approved development. The No Build Alternative is not anticipated to have any utility impacts or relocations beyond those directly associated with the build out of the Port Covington Master Plan.

Relocation, protection, reinforcement, and maintenance of existing utilities is anticipated for the construction of the highway elements of the Recommended Preferred Alternative. Existing utilities will be avoided to the extent possible, while obsolete utilities may be removed, upgraded, or relocated, as appropriate. Utility conflicts will be addressed on a case-by-case basis. It is anticipated that there will be utility relocations necessary during the reconstruction of McComas Street and Key Highway.

The Recommended Preferred Alternative would likely have some utility impacts along McComas and Hanover Streets. If approved, careful coordination between the proposed improvements and the construction of the Port Covington redevelopment will take place to minimize impacts and ensure that utilities are only relocated once. The long-term capacity and ability of the utility infrastructure to provide service will not be affected.

Temporary impacts to existing utilities are anticipated during construction, and include service interruptions to install temporary or replacement utility services. The duration of service interruptions would vary according to utility type and construction requirements.

3.11 Indirect and Cumulative Effects

This section provides a summary of the indirect and cumulative effects on socio-economic, cultural, and natural resources resulting from the Recommended Preferred Alternative. The detailed analysis is included in Appendix J, "Indirect and Cumulative Technical Report."

Indirect effects are defined as,
"effects which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems" (40 CFR § 1508.8(b)).

Cumulative impacts are defined as,
"impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions" (40 CFR § 1508.7).

Socio-Economic Resources

The indirect effects resulting from the Recommended Preferred Alternative would be experienced by communities located in close proximity to the I-95 Access Improvement Project. Transportation benefits associated with the Recommended Preferred Alternative include reduced travel time and more efficient mobility within the region. Improved access, mobility, and safety for drivers in the ICE boundary would improve travel to work, shopping, school, and recreational destinations. Businesses would benefit from the improved transportation system's ability to accommodate projected increases in traffic. However, the project may result in an increase in traffic within the neighborhoods requiring additional future improvements to the roadway network.

Projected land use changes and planned development are consistent with development trends, population growth, and land conversion patterns in the ICE boundary, and could induce future development/redevelopment. Increased development often coincides with increased population and employment. Population size and density will increase, as will traffic congestion, which may trigger the need for additional future transportation improvements, commercial development, and community facilities and services (police, fire, and emergency medical services; places of worship, public facilities, and schools).

Cultural Resources

There are no indirect effects to Archaeological and Historical Sites and Structures associated with the project. The Recommended Preferred Alternative would not require right-of-way from any historically registered sites and is not expected to increase development rates or densities itself within the ICE boundary. The project is not anticipated to introduce visual, atmospheric, or audible elements to the sites, thus would not diminish the integrity of significant historic features.

Natural Resources

Minor indirect effects to groundwater, surface water, wetlands may occur as a result of roadway runoff, sedimentation, and alterations to hydrology, thereby potentially affecting the extent and quality of available wetland habitat. Construction of the piers and fill for the Recommended Preferred Alternative could potentially increase base flood levels, but to what extent will not be known pending a detailed hydrologic and hydraulic study during final design.

The study area and the ICE boundary have been built-out, with few undeveloped areas remaining. Future planned residential and commercial development independent of the I-95 Access Improvements Project is likely to have cumulative effects of increasing population and employment within the ICE boundary.

It is unlikely that runoff would reach the groundwater table and any runoff would be treated in accordance with MDE regulations for stormwater management and released to surface waters, resulting in minor cumulative effects to these resources, if any. As redevelopment pressure rises, there may be additional cumulative effects to groundwater, surface water, and wetlands.

Potential Mitigation Measures

Strict zoning and state and federal regulations are in place to protect wetlands, waterways, and designated conservation areas from development through the permitting process. Additionally, limiting cumulative effects to natural resources will require protection of critical resource lands, directing new development to already developed lands, enhancing control of stormwater quantity and quality, and maximizing the use of smart growth and low impact development approaches. The use of Best Management Practices and stormwater management practices by future developers in the ICE boundary will minimize overall impacts.

3.12 Construction Effects

Construction activities for the Recommended Preferred Alternative, their potential effects, and measures to avoid, minimize, and mitigate them were analyzed. Actual construction methods may change depending on the final project design. As the project design advances, MDTA and BCDOT will develop a specific construction plan describing construction sequencing, equipment, and methodologies. Both agencies will be responsible for completing commitments made as part of the NEPA process for the facilities which fall under their jurisdiction.

MDTA and Baltimore City will also develop and implement an Environmental Compliance Plan (ECP) prior to the initiation of construction activities. The plan will identify and describe the management of environmental commitments and mitigation measures as the project design advances.

A possible scenario of potential contracts, construction sequence, and construction timeframes for each of the elements in the Recommended Preferred Alternative are presented in Table ES-2.

Table ES-2: Potential Construction Phasing

Project/ Contract	Description/ Elements	Duration	Start	End
1	• SB exit ramp to McComas St. (Element C) • SB entrance ramp from McComas St. (Element D) • CSX ROW acquisition/track relocation Notes: Construction cannot start until CSX ROW acquired and tracks are relocated	36 months	Early 2020	End 2022
10	CSX bridge over Key Highway (Element C) Notes: Must be completed before Key Hwy. widening (Contract 4)	30 months	Mid 2020	End 2022
2	McComas St. from Hanover St. to Key Highway (Element F) Notes: Construction cannot start until preliminary work is complete	30 months	Early 2021	Mid/ Late 2023
3	NB exit ramp to McComas St. (Element A) Notes: • Must be completed concurrent with McComas Street (Contract 2) • Exit must remain open at all times	36 months	Mid/ Late 2020	Mid/ Late 2023
4	• Key Highway SB exit ramp intersection improvements (Element C) • Key Highway widening (Element C) Notes: • Preferable for ramp construction to begin after new SB exit ramp is constructed (Contract 1) • Cannot widen Key Hwy. until CSX bridge replaced	18 months	Mid 2023	End 2024
5	McComas St. west of Hanover St. (Element F) Notes: Must be completed, at least sufficiently to provide eastbound access to Hanover Street, prior to new NB exit ramps (Russell St. and I-395) (Contract 6)	18 months	Mid 2025	End 2026
6	• NB Russell St. ramp/spur/bridge (Element A) • I-395 SB ramp spur (Element A) Notes: Constructed prior to beginning of development and infrastructure improvements on the west side of the PC site	48 months	Early/ Mid 2022	Early/ Mid 2026
7	Removal of NB ramp to Hanover St. (Element A) Notes: Cannot remove ramp until new NB exit ramps have been constructed (Contracts 3 and 5)	12 months	Late 2025	Mid/ Late 2026
8	NB entrance ramp from McComas St. (Element B) Notes: Can be constructed any time after McComas St., but likely not needed until after other ramps	30 months	Early 2026	Mid 2028
9	New pedestrian bridge over CSX/under I-95 (Element G) Notes: Can be constructed any time after McComas St.	30 months	Early 2029	Late 2029

Effects on traffic, neighborhoods, and public safety will be avoided, minimized, and mitigated to the maximum extent practical. The potential effects associated with the construction of the Recommended Preferred Alternative could include:

- Temporary interruptions to traffic;
- Temporary loss of on-street parking;
- Emissions and dust from construction vehicles;
- Noise from construction equipment and activities;
- Erosion and sedimentation; and
- Exposure to contaminated soils.

Contaminated soils are known to exist at several locations, including the property located at on the northwest side of the peninsula. As such, the alignment of the merged ramps for Element A will pass through the north side of existing Swann Park to avoid soil disturbance on the property. While the LOD shows potential disturbance to the property, it will only be utilized for construction access to the elevated section of I-95. No ground disturbance would occur at that location.

4.0: SECTION 4(F)

A nationwide programmatic Section 4(f) net benefit evaluation was prepared for Swann Park. Section 4(f) of the USDOT Act of 1966 established the requirement for consideration of publicly-owned park and recreational lands, publicly-owned wildlife and waterfowl refuges, and historic sites in transportation projects that receive funding from or require approval by the USDOT. As a USDOT agency, FHWA cannot approve a transportation project that uses Section 4(f) property unless there is no feasible and prudent avoidance alternative to the use of the land; or, the use of the property, including any avoidance, minimization, mitigation or enhancement measures, would have a de minimis use on the property.

Baltimore City's Swann Park is an 11-acre parcel located on the northwest side of the Port Covington peninsula, just south of I-95. Existing Swann Park contains baseball and softball diamonds, a football field, and a pedestrian trail. The City's 2016 approved Port Covington Master Plan includes the relocation of the existing park to the south. Future Swann Park will be approximately 26 acres, extending along the majority of the peninsula's western waterfront and will contain similar features to the existing park. The developer's current timeline assumes the complete construction of the new park in 2027 prior to removing existing Swann Park.

However, the Recommended Preferred Alternative includes a proposed new exit ramp from I-95 northbound (Element A) that would require piers in the northern end of existing Swann Park, potentially prior to the completion of future Swann Park. This preferred alignment is known as Option 2.

Option 2 would result in a permanent incorporation of a Section 4(f) use for existing Swann Park. Therefore, MDTA and BCDOT studied the following alternatives to avoid the use of the Section 4(f) property:

1. No Build
2. Improving the transportation facility in a manner that addresses the project's purpose and need without use of the Section 4(f) property
3. Relocating the proposed project to a new location

While avoiding both existing Swann Park and future Swann Park, the No Build Alternative is not a prudent alternative as it does not meet the project's stated purpose and need.

The stated purpose of the I-95 Access Improvements project is to accommodate forecasted increased transportation demand on I-95 and the surrounding transportation network due to the build out of the Port Covington Master Plan, as well as enhancing multi-modal connections to the Port Covington peninsula. Therefore, moving the proposed project to another location is not possible.

Opportunities for avoidance alternatives are limited. Option 1 would require piers in the property at 2000 Race Street (just to the north of existing Swann Park) to support the structure. The presence of chromium ore processing residue (COPR), and herbicide and pesticide wastes on the site is known. A multi-layered engineered cap (clay and asphalt) was placed on the parcel to limit exposure to contamination and limit the infiltration of water into the underlying contaminated soils. With the known contaminants at this site, and the potential risks and liability issues associated with opening the cap to construct the new ramp structure, MDTA and Baltimore City looked at other potential minimization options for the proposed ramp that would not cross this site and would still provide the same level of access to the peninsula.

Option 3 and Option 4 were developed to avoid a direct impact to existing Swann Park. While shifting to the south would indeed avoid existing Swann Park, they both would cut through the location of the already approved park relocation site.

As each of these Options would satisfy the project's purpose and need, MDTA and BCDOT could not eliminate any based on that criterion. Consequently, they conducted an engineering feasibility and preliminary environmental analysis for each. Another key criterion was whether or not a particular build option would include a use of either Existing Swann Park or Future Swann Park, as it is currently contemplated in the Port Covington Master Plan.

None of the minimization options assessed for this programmatic evaluation—Do Nothing/No Build, improvement of existing infrastructure without the use of the Section 4(f) land, and complete avoidance of the property—adequately meet the project purpose and need. Also, normal maintenance to existing access roadways would not resolve access deficiencies addressed by the I-95 Access Improvements project. In the end, Option 2 was selected as the best alignment for the northbound I-95 off-ramp even though it has a direct effect on existing Swann Park. Ultimately, Option 2 has the least impact on future Swann Park (0.1 acres, which could be avoided completely during final design) as compared to Options 3 and 4, which would impact 0.9 acres and 3.1 acres of future Swann Park, respectively. These two options would also cause cascading effects on the proposed new street grid on the Port Covington peninsula and would likely cause several intersection to fail. Option 2 also avoids the known contaminated materials, and attendant construction challenges, at the 2000 Race Street property. Minimization of harm to the Section 4(f) property will occur through project design elements; and, opportunities for mitigation, enhancement, and the addition of beneficial measures will improve the relocated park property, resulting in a net benefit to Swann Park.

With respect to architectural resources, MDTA and BCDOT are awaiting final concurrence from the Maryland Historical Trust (MHT) on their recommendations regarding their eligibility for the National Register of Historic Places (NRHP).

5.0: AGENCY COORDINATION AND PUBLIC INVOLVEMENT

This chapter summarizes the framework for the outreach tools, methods and engagement opportunities developed for the I-95 Access Improvements Project. It also documents compliance with NEPA and other applicable federal rules and regulations, including Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations;" Title VI of the Civil Rights Act of 1964, as amended; and, FHWA's Title VI program as outlined in 23 CFR 200. Transparent two-way communication between a project sponsor, resource agencies and the public improves a project's development and overall design and allows public input on a wide range of issues.

Agency Coordination

The I-95 Access Improvements EA is being developed in accordance with NEPA and the Maryland Streamlined Environmental and Regulatory Process, including coordination with federal, state, and local regulatory agencies. Outreach to these agencies has primarily been through regular Interagency Review Meetings, correspondence, and coordination.

The resource agencies that attend the Interagency Review Meetings typically include:

- Federal Highway Administration (FHWA)
- Maryland Department of Transportation (MDOT)
- Army Corps of Engineers (ACOE)
- United States Environmental Protection Agency USEPA (Region 3)
- Unites States Fish and Wildlife Service (USFWS)
- United States Coast Guard (USCG)
- Maryland Department of Natural Resources (MDNR)
- Maryland Department of the Environment (MDE)
- Maryland Historical Trust (MHT)

MDTA and BCDOT gave presentations on the status of the I-95 Access Improvements project at key milestones throughout the alternatives analysis, environmental investigations and development of the Draft EA.

MDTA and BCDOT also have a standing, monthly meeting with FHWA, the federal lead agency. These regular meetings facilitate the exchange of information between the FHWA, MDTA, and BCDOT and expedite the resolution of any issues that may arise.

Public Involvement Program

A public involvement program allows all members of the public (residents, elected officials, government agencies, environmental groups, large and small businesses, media, and non-governmental organizations) to voice any questions/comments/concerns they have on a proposed project and to have meaningful participation in its planning or refinement. Public involvement also provides the community the opportunity to become informed on the various elements under consideration within a project's study area, and allows the engineers and planning professionals to become more educated on the public's views and position on the proposed action. The public involvement plan (PIP) outlines a process and the tools to allow stakeholders and the larger public to engage in meaningful ways, giving feedback and input to

inform the transportation decision-making process that can be responsive to varying needs within the constraints of budget and technical realities.

MDTA and BCDOT established a dialogue with, and distributed project information to, the public in multiple ways. These included developing various project materials, as well as attending events and meetings. Some of these are described in greater detail below.

Project Webpage – The I-95 Access Improvements webpage provides the most up-to-date information on the project and announces any upcoming meetings and events. It includes project maps, descriptions of the elements and alternatives under consideration, meeting information, and contact information. The web address is http://www.mdta.maryland.gov/Capital_Projects/I-95_Access_Study/Home.html.

Virtual Meeting – MDTA and BCDOT posted a virtual meeting on MDTA's website (http://www.mdta.maryland.gov/Capital_Projects/I-95_Access_Study/Virtual_Meeting.html) on January 6, 2017, for those who could not attend the two public open houses in November 2016. The virtual meeting is essentially seven brief on-demand videos showing the display boards that were at the open houses with a voiceover explanation. They highlight the project elements under consideration during the alternatives analysis. The videos are still available to the public on the project webpage.

Project Publications – A handout/brochure was developed to provide attendees information about the November 2016 Open House meetings including: the project purpose and need; description of NEPA; project elements under consideration; project schedule; opportunities for public comment and input; and, project contact information.

Media Outreach – MDTA and BCDOT used a variety of media outlets to inform the community about upcoming open houses and general information regarding the I-95 Access Improvements Project. Ads were printed in various newspapers (Baltimore Sun, Baltimore Times, and the Afro) informing interested parties of the Open House Meetings throughout the City. MDTA, BCDOT Planning and the I-95 Access Improvements Project webpages presented the Open House meeting information. Baltimore Metropolitan Council of Governments (BMC) and Baltimore Regional Transportation Board (BRTB) distributed the meeting flyer internally, and gave verbal notice of Open House meetings at their meetings. Social media pages (Twitter and Facebook) for MDTA and BCDOT posted the meeting flyer. The meeting announcements for the Open Houses provided the reader the location, time, brief reason for the meeting, responsible parties for the study, where to obtain more information and or who to contact with further questions/comments.

Project Communications and In-field Outreach – To promote the November open house series flyers were distributed throughout the study area neighborhoods (Sharp-Leadenhall, Locust Point, Federal Hill, Riverside, South Baltimore, Cherry Hill, and Westport) with a focus on schools, grocery stores, places of worship, recreation centers, museums, libraries, health care centers, and senior centers. In addition, 12,731 postcards were sent to residences within and near the project area neighborhoods (Sharp-Leadenhall, Locust Point, Federal Hill, Riverside, South Baltimore, Cherry Hill, and Westport).

Business/Stakeholder Meetings & Outreach/Project Briefings and Presentations – MDTA and BCDOT meet with businesses, special interest groups, and governmental agencies in an effort to provide project updates, as well as to solicit comments. As new project details and updates become available, meetings are scheduled with these entities and coordinated.

Opportunities for Public Input

Public Open House Meetings – The two Open House meetings allowed the public the opportunity to learn and discuss the proposed transportation improvements being reviewed in the I-95 Access Improvements Study and to comment on the alternatives under consideration. The first meeting was held November 2, 2016 from 6:00pm – 8:00pm at Dr. Carter G. Woodson Elementary/Middle School at 2501 Seabury Road Baltimore, MD 21225, and the second meeting was held November 5, 2016 from 10:00am – 12:00pm at the National Federation of the Blind at 200 East Wells Street Baltimore, MD 21230. Both locations are in the study corridor. Comments on the proposed project were generally related to process, including the study's timeline and the types of analyses to be performed. In reviewing the options under consideration for each project element, multiple attendees said they would not support any alternative that includes the removal of a direct connection between Hanover Street and I-395, an option under consideration during the Alternatives Analysis but which was later rejected.

Grassroots Outreach –The MDTA/BCDOT project team informed residents and stakeholders about the project via door-to-door outreach, community meetings, and neighborhood association meetings.

Public Hearings – Following the release of this EA, two public hearings will be held to present the findings of the EA and to obtain input and comments from the community. All comments received during the meeting and established public comment period will be considered, and all substantive comments will be addressed.