

Appendix K: Agency Correspondence

for the

I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel – Environmental Assessment (EA) Baltimore City, Maryland

Prepared for:



Maryland
Transportation
Authority



and



March 2018

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United States Department of the Interior



FISH AND WILDLIFE SERVICE
Chesapeake Bay Ecological Services Field Office
177 ADMIRAL COCHRANE DRIVE
ANNAPOLIS, MD 21401

PHONE: (410)573-4599 FAX: (410)266-9127

URL: www.fws.gov/chesapeakebay/;

www.fws.gov/chesapeakebay/endsppweb/ProjectReview/Index.html

Consultation Code: 05E2CB00-2016-SLI-1635

August 03, 2016

Event Code: 05E2CB00-2016-E-01677

Project Name: Middle Branch of the Patapsco River Sagamore Development, Baltimore City

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. This species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

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We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment



United States Department of Interior
Fish and Wildlife Service

Project name: Middle Branch of the Patapsco River Sagamore Development, Baltimore City

Official Species List

Provided by:

Chesapeake Bay Ecological Services Field Office

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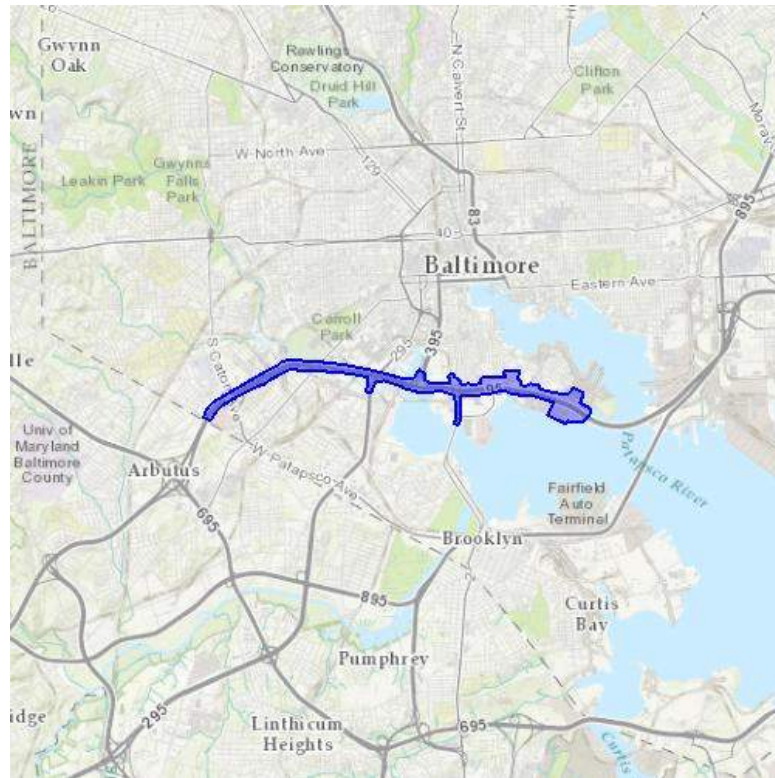
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United States Department of Interior
Fish and Wildlife Service

Project name: Middle Branch of the Patapsco River Sagamore Development, Baltimore City

Project Location Map:



Project Coordinates: The coordinates are too numerous to display here.

Project Counties: Baltimore (city), MD



United States Department of Interior
Fish and Wildlife Service

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Endangered Species Act Species List

There are a total of 0 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

There are no listed species identified for the vicinity of your project.



United States Department of Interior
Fish and Wildlife Service

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Critical habitats that lie within your project area

There are no critical habitats within your project area.



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Appendix A: FWS National Wildlife Refuges and Fish Hatcheries

There are no refuges or fish hatcheries within your project area.



United States Department of Interior
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Appendix B: NWI Wetlands

The U.S. Fish and Wildlife Service is the principal Federal agency that provides information on the extent and status of wetlands in the U.S., via the National Wetlands Inventory Program (NWI). In addition to impacts to wetlands within your immediate project area, wetlands outside of your project area may need to be considered in any evaluation of project impacts, due to the hydrologic nature of wetlands (for example, project activities may affect local hydrology within, and outside of, your immediate project area). It may be helpful to refer to the USFWS National Wetland Inventory website. The designated FWS office can also assist you. Impacts to wetlands and other aquatic habitats from your project may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal Statutes. Project Proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate U.S. Army Corps of Engineers District.

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery and/or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Exclusions - Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Precautions - Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of



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this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

The following NWI Wetland types intersect your project area in one or more locations. To understand the NWI Classification Code, see <https://ecos.fws.gov/ipac/wetlands/decoder>. To view the National Wetlands Inventory on a map go to <http://www.fws.gov/wetlands/Data/Mapper.html>.

Wetland Types	NWI Classification Code
Estuarine and Marine Deepwater	E1UBL
Estuarine and Marine Wetland	E2EM1P
Riverine	R1UBV
Riverine	R1USQ
Riverine	R5UBH
Riverine	R2UBH



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor
Mark Belton, Secretary
Joanne Throwe, Deputy Secretary

November 23, 2016

Mr. Glen A. Smith
MD Department of Transportation
2310 Broening Highway
Baltimore, Maryland 21224

RE: Environmental Review for I-95 Access Improvements Project, Port Covington area, Baltimore City, Maryland.

Dear Mr. Smith:

The Wildlife and Heritage Service has determined that there are no official State or Federal records for listed plant or animal species within the delineated area shown on the map provided. As a result, we have no specific concerns regarding potential impacts or recommendations for protection measures at this time. Please let us know however if the limits of proposed disturbance or overall site boundaries change and we will provide you with an updated evaluation.

Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at (410) 260-8573.

Sincerely,

Lori A. Byrne,
Environmental Review Coordinator
Wildlife and Heritage Service
MD Dept. of Natural Resources

ER# 2016.1466.bc



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor
Mark Belton, Secretary
Joanne Throwe, Deputy Secretary

January 13, 2017

Glen A. Smith
Project Manager
Maryland Transportation Authority
Division of Planning and Program Development
2310 Broening Highway
Baltimore, MD 21224

Subject: Fisheries Information for the Proposed I-95 Access Improvements Project, Port Covington Area, Baltimore City, Maryland, by the Maryland Transportation Authority (MDTA) and the City of Baltimore's Department of Transportation (City DOT).

Dear Mr. Smith:

The above referenced project has been reviewed to determine fisheries species and aquatic resources in the vicinity of the proposed project. The proposed activities include a suite of improvements to the I-95 ramps and other transportation facilities to support an existing and planned development in the Port Covington Area of Baltimore City. The project area generally runs along the northern boundary of the Port Covington peninsula and includes I-95 between interchanges 50 and 56, as well as multiple City streets, including Hanover Street, McComas Street, and Key Highway. Note that Maryland Department of Natural Resources will be actively involved in the review and interagency coordination on this project, and that this response is only for the preliminary fisheries information coordination, and contains no other project analysis or comments. Please see separate response from our Department's Wildlife and Heritage Service, especially in regard to potential waterfowl concentration area comments for tidal waters nearby.

The project study area is located within the Patapsco River Basin. The tidal waters of Patapsco River and Gwynns Falls are designated as Use II waters. Nontidal tributaries in the area are designated as Use I waters.

Anadromous fish species, including herring, white perch, and yellow perch, are documented to spawn and migrate in the vicinity of the project. These fish may especially migrate toward riverine habitat near the mouths of Gwynns Falls and the Patapsco River, or areas upstream. Generally, no instream work is permitted in these Use I and Use II waterways near the project during the period of February 15 through June 15, inclusive, during any year. This recommendation should be expected during project and permit review. For Use II waters, review will occur to determine the likelihood of individual construction activities to suspend sediments within the water column.

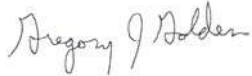
Many resident and transient gamefish and non-game fish species may also be found in the waters near the project site and study area. The spawning periods of those fish species likely to spawn in the area will be protected by the above referenced instream work restriction period. Protection of aquatic habitat and fish health for these species will include proactive sediment and erosion control measures, protection of pH spikes that may result from curing concrete materials, and Best Management Practices for any associated pile driving or other in-water noise and vibration generation.

Note that any project aspects that may involve demolition and disposal of clean concrete rubble (such as concrete pavement or concrete building structure removal) may be of interest to the artificial fish reef program of our Department. This opportunity generally is identified and coordinated later in project study, but is referenced now due to its high potential for mutually beneficial (win – win) partnerships in transportation infrastructure construction and fisheries management.

Our review of submerged aquatic vegetation (SAV) data layers indicates that there is a possibility of SAV presence in waters of the tidal Patapsco River over time, but firm documentation has not occurred in the nearby waters for over 10 years. SAV presence can vary from year to year, and environmental studies for the project should include further database checks over time for current or future documentation of SAV presence nearby. Field surveys for SAV may be recommended later if construction is proposed within tidal waters. An instream restriction period for construction to protect SAV during the growing season would only be recommended at this site in cases where SAV has been documented within 5 years, and within 500 yards of the proposed instream construction within tidal waters.

Maryland Department of Natural Resources will remain available for further coordination on project and resource specifics as the study continues. If you have further questions, please contact me at your convenience at 410-260-8331, or greg.golden@maryland.gov

Sincerely,

A handwritten signature in cursive script that reads "Gregory J. Golden".

Greg Golden
Environmental Review Program
Resource Assessment Service

Nikki Radke

From: Brian D Hopper - NOAA Federal <brian.d.hopper@noaa.gov>
Sent: Friday, April 21, 2017 12:57 PM
To: Nikki Radke
Cc: Kristy Beard - NOAA Federal; Christine Vaccaro - NOAA Federal; Chimere Lesane-Matthews
Subject: Re: I-95 Access Improvements project

Hi Nikki,

Here are some comments in response to your request for information on the presence of threatened and endangered species and critical habitat listed under our jurisdiction. It is our understanding that you are proposing improvements to the I-95 ramps and other transportation facilities over the Middle Branch of the Patapsco River.

Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) are present in the Chesapeake Bay and its adjacent rivers and tributaries, and the coastal waters of Maryland. The New York Bight, Chesapeake Bay, South Atlantic and Carolina DPS of Atlantic sturgeon are endangered; the Gulf of Maine DPS is threatened. Individuals originating from any of these DPS could occur in the project area.

Shortnose sturgeon (*Acipenser brevirostrum*) are present in the Chesapeake Bay and several of its tributaries have habitat characteristics such as hard bottom substrate and areas of high flow that may be suitable for spawning. These include the Gunpowder, James, York, Susquehanna and Potomac Rivers. Shortnose sturgeon are endangered throughout their range.

Depending on habitat conditions at the project site (e.g., depth, substrate type, benthic resources present), sturgeon may occur in the project area and a consultation pursuant to section 7 of the ESA may be necessary. As project details develop, we recommend you consider the following effects of the projects on sturgeon:

- Effects of increased suspended sediment;
- Suspension of contaminated sediment;
- Discharge of any other pollutant;
- Loss of prey; and
- Any impacts to habitat or conditions that make affected water bodies less suitable for these species.

Because listed species of sturgeon may occur within the vicinity of your proposed project, any proposed in-water work has the potential to impact these species. Depending on final project design we recommend you consider the following Best Management Practices to minimize and avoid impacts to listed species:

- For any impacts to habitat or conditions that temporarily render affected water bodies unsuitable for the above-mentioned species, consider the use of timing restrictions for in-water work.
- For activities that increase levels of suspended sediment, consider the use of silt management and/or soil erosion best practices (e.g., silt curtains and/or cofferdams).
- For pile driving or other activities that may affect underwater noise levels, consider the use of cushion blocks, bubble curtain, and other noise attenuating tools.
- For work that will increase vessel traffic within the project area, consider restricting the number of trips taken by each vessel and restricting the speed at which the vessel can travel.

If you have any questions regarding these comments, please feel free to contact me (410-573-4592 or brian.d.hopper@noaa.gov).

Regards,
-Brian

On Fri, Apr 21, 2017 at 12:31 PM, Nikki Radke <nradke@straughanenvironmental.com> wrote:

Good afternoon Kristy, Brian, and Christine:

The Maryland Transportation Authority (MDTA) and the City of Baltimore is proposing a suite of improvements to the I-95 ramps and other transportation facilities over the Middle Branch of the Patapsco River and near Gwynns Falls in Baltimore City, Maryland. A map of the area is attached for your reference.

We request any information concerning federally listed or endangered marine species or habitat that may occur in the study area. If you have any questions or need additional information regarding this request, please feel free to contact me.

NIKKI RADKE, M.S.

ENVIRONMENTAL SCIENTIST

STRAUGHAN ENVIRONMENTAL, INC.

10245 OLD COLUMBIA ROAD | COLUMBIA, MD 21046

DIRECT: [443.539.2521](tel:443.539.2521) | FAX: [301.362.9245](tel:301.362.9245)

www.straughanenvironmental.com

...creating a sustainable world

--
Brian D. Hopper
Protected Resources Division

NOAA Fisheries
Greater Atlantic Regional Fisheries Office
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<http://www.greateratlantic.fisheries.noaa.gov/>



Nikki Radke

From: Kristy Beard - NOAA Federal <kristy.beard@noaa.gov>
Sent: Wednesday, May 3, 2017 11:01 AM
To: Nikki Radke
Cc: Chimere Lesane-Matthews
Subject: Re: FW: I-95 Access Improvements project

Hi Nikki,

Yes, the habitat exists in the study area, but it's not preferred habitat for them and I only really comment on impacts to their prey species in that area.

My focus for the project will be on minimizing impacts to anadromous fish. The Patapsco River provides habitat for a variety of NOAA trust resources such as anadromous fish that would migrate past the project area for spawning. Efforts should be made to avoid and minimize adverse effects to the aquatic environment. Best management practices should be used to minimize the release of suspended sediment in the waterway and acoustic impacts to fish in the area. Depending on what in-water work is planned, time of year restrictions (February 15 through June 15) may be necessary during anadromous fish migration and spawning. Other BMPs such as bubble curtains to minimize sound impacts from pile driving may also be recommended, depending on the work proposed.

Thanks!
Kristy

On Tue, May 2, 2017 at 2:29 PM, Nikki Radke <nradke@straughanenvironmental.com> wrote:

Good afternoon Kristy and Christine,

I'm following up on the email I sent a few weeks ago to see if there was any additional concerns or relevant information about RTE species or habitat in our project area. I've attached a map of the I-95 study area for your reference.

Kristy,

I also attached a screenshot of the EFH online map. The Data Query Tool listed EFH for window pane flounder, summer flounder, and bluefish. Could you confirm that habitat for these species would occur within our study area?

Thank you,

Nikki

NIKKI RADKE, M.S.

ENVIRONMENTAL SCIENTIST

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...creating a sustainable world

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*Kristy Beard
Marine Habitat Resource Specialist
Habitat Conservation Division*

*NOAA Fisheries
177 Admiral Cochrane Drive
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<http://www.nmfs.noaa.gov/>



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August 03, 2016

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United States Department of Interior
Fish and Wildlife Service

Project name: Middle Branch of the Patapsco River Sagamore Development, Baltimore City

Official Species List

Provided by:

Chesapeake Bay Ecological Services Field Office

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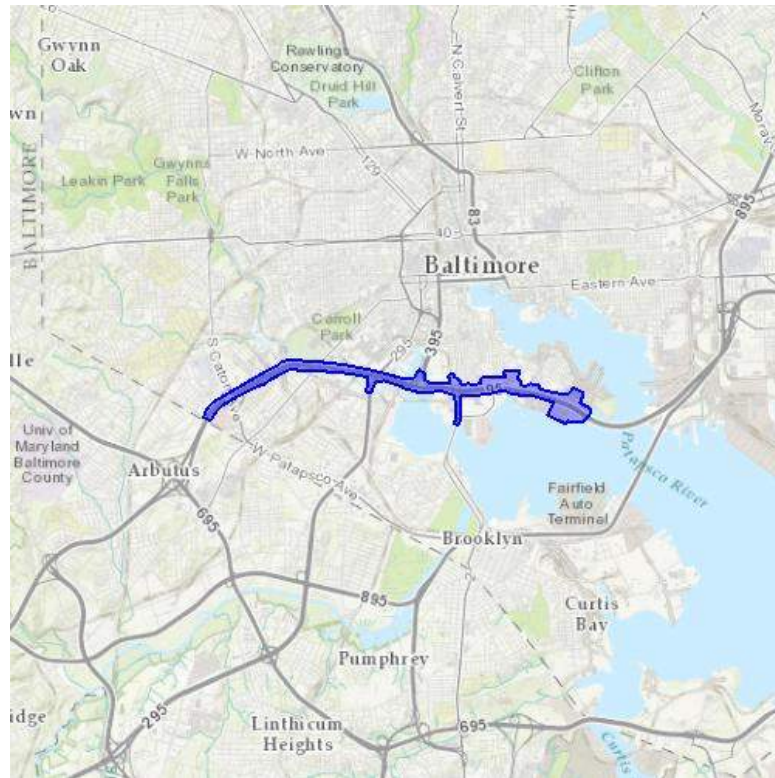
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Fish and Wildlife Service

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Project Counties: Baltimore (city), MD



United States Department of Interior
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Project name: Middle Branch of the Patapsco River Sagamore Development, Baltimore City

Endangered Species Act Species List

There are a total of 0 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

There are no listed species identified for the vicinity of your project.



United States Department of Interior
Fish and Wildlife Service

Project name: Middle Branch of the Patapsco River Sagamore Development, Baltimore City

Critical habitats that lie within your project area

There are no critical habitats within your project area.



United States Department of Interior
Fish and Wildlife Service

Project name: Middle Branch of the Patapsco River Sagamore Development, Baltimore City

Appendix A: FWS National Wildlife Refuges and Fish Hatcheries

There are no refuges or fish hatcheries within your project area.



United States Department of Interior
Fish and Wildlife Service

Project name: Middle Branch of the Patapsco River Sagamore Development, Baltimore City

Appendix B: NWI Wetlands

The U.S. Fish and Wildlife Service is the principal Federal agency that provides information on the extent and status of wetlands in the U.S., via the National Wetlands Inventory Program (NWI). In addition to impacts to wetlands within your immediate project area, wetlands outside of your project area may need to be considered in any evaluation of project impacts, due to the hydrologic nature of wetlands (for example, project activities may affect local hydrology within, and outside of, your immediate project area). It may be helpful to refer to the USFWS National Wetland Inventory website. The designated FWS office can also assist you. Impacts to wetlands and other aquatic habitats from your project may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal Statutes. Project Proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate U.S. Army Corps of Engineers District.

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery and/or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Exclusions - Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Precautions - Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of



United States Department of Interior
Fish and Wildlife Service

Project name: Middle Branch of the Patapsco River Sagamore Development, Baltimore City

this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

The following NWI Wetland types intersect your project area in one or more locations. To understand the NWI Classification Code, see <https://ecos.fws.gov/ipac/wetlands/decoder>. To view the National Wetlands Inventory on a map go to <http://www.fws.gov/wetlands/Data/Mapper.html>.

Wetland Types	NWI Classification Code
Estuarine and Marine Deepwater	E1UBL
Estuarine and Marine Wetland	E2EM1P
Riverine	R1UBV
Riverine	R1USQ
Riverine	R5UBH
Riverine	R2UBH



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor
Mark Belton, Secretary
Joanne Throwe, Deputy Secretary

November 23, 2016

Mr. Glen A. Smith
MD Department of Transportation
2310 Broening Highway
Baltimore, Maryland 21224

RE: Environmental Review for I-95 Access Improvements Project, Port Covington area, Baltimore City, Maryland.

Dear Mr. Smith:

The Wildlife and Heritage Service has determined that there are no official State or Federal records for listed plant or animal species within the delineated area shown on the map provided. As a result, we have no specific concerns regarding potential impacts or recommendations for protection measures at this time. Please let us know however if the limits of proposed disturbance or overall site boundaries change and we will provide you with an updated evaluation.

Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at (410) 260-8573.

Sincerely,

Lori A. Byrne,
Environmental Review Coordinator
Wildlife and Heritage Service
MD Dept. of Natural Resources

ER# 2016.1466.bc



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor
Mark Belton, Secretary
Joanne Throwe, Deputy Secretary

January 13, 2017

Glen A. Smith
Project Manager
Maryland Transportation Authority
Division of Planning and Program Development
2310 Broening Highway
Baltimore, MD 21224

Subject: Fisheries Information for the Proposed I-95 Access Improvements Project, Port Covington Area, Baltimore City, Maryland, by the Maryland Transportation Authority (MDTA) and the City of Baltimore's Department of Transportation (City DOT).

Dear Mr. Smith:

The above referenced project has been reviewed to determine fisheries species and aquatic resources in the vicinity of the proposed project. The proposed activities include a suite of improvements to the I-95 ramps and other transportation facilities to support an existing and planned development in the Port Covington Area of Baltimore City. The project area generally runs along the northern boundary of the Port Covington peninsula and includes I-95 between interchanges 50 and 56, as well as multiple City streets, including Hanover Street, McComas Street, and Key Highway. Note that Maryland Department of Natural Resources will be actively involved in the review and interagency coordination on this project, and that this response is only for the preliminary fisheries information coordination, and contains no other project analysis or comments. Please see separate response from our Department's Wildlife and Heritage Service, especially in regard to potential waterfowl concentration area comments for tidal waters nearby.

The project study area is located within the Patapsco River Basin. The tidal waters of Patapsco River and Gwynns Falls are designated as Use II waters. Nontidal tributaries in the area are designated as Use I waters.

Anadromous fish species, including herring, white perch, and yellow perch, are documented to spawn and migrate in the vicinity of the project. These fish may especially migrate toward riverine habitat near the mouths of Gwynns Falls and the Patapsco River, or areas upstream. Generally, no instream work is permitted in these Use I and Use II waterways near the project during the period of February 15 through June 15, inclusive, during any year. This recommendation should be expected during project and permit review. For Use II waters, review will occur to determine the likelihood of individual construction activities to suspend sediments within the water column.

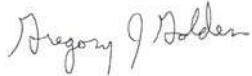
Many resident and transient gamefish and non-game fish species may also be found in the waters near the project site and study area. The spawning periods of those fish species likely to spawn in the area will be protected by the above referenced instream work restriction period. Protection of aquatic habitat and fish health for these species will include proactive sediment and erosion control measures, protection of pH spikes that may result from curing concrete materials, and Best Management Practices for any associated pile driving or other in-water noise and vibration generation.

Note that any project aspects that may involve demolition and disposal of clean concrete rubble (such as concrete pavement or concrete building structure removal) may be of interest to the artificial fish reef program of our Department. This opportunity generally is identified and coordinated later in project study, but is referenced now due to its high potential for mutually beneficial (win – win) partnerships in transportation infrastructure construction and fisheries management.

Our review of submerged aquatic vegetation (SAV) data layers indicates that there is a possibility of SAV presence in waters of the tidal Patapsco River over time, but firm documentation has not occurred in the nearby waters for over 10 years. SAV presence can vary from year to year, and environmental studies for the project should include further database checks over time for current or future documentation of SAV presence nearby. Field surveys for SAV may be recommended later if construction is proposed within tidal waters. An instream restriction period for construction to protect SAV during the growing season would only be recommended at this site in cases where SAV has been documented within 5 years, and within 500 yards of the proposed instream construction within tidal waters.

Maryland Department of Natural Resources will remain available for further coordination on project and resource specifics as the study continues. If you have further questions, please contact me at your convenience at 410-260-8331, or greg.golden@maryland.gov

Sincerely,

A handwritten signature in cursive script that reads "Gregory J. Golden".

Greg Golden
Environmental Review Program
Resource Assessment Service

Nikki Radke

From: Brian D Hopper - NOAA Federal <brian.d.hopper@noaa.gov>
Sent: Friday, April 21, 2017 12:57 PM
To: Nikki Radke
Cc: Kristy Beard - NOAA Federal; Christine Vaccaro - NOAA Federal; Chimere Lesane-Matthews
Subject: Re: I-95 Access Improvements project

Hi Nikki,

Here are some comments in response to your request for information on the presence of threatened and endangered species and critical habitat listed under our jurisdiction. It is our understanding that you are proposing improvements to the I-95 ramps and other transportation facilities over the Middle Branch of the Patapsco River.

Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) are present in the Chesapeake Bay and its adjacent rivers and tributaries, and the coastal waters of Maryland. The New York Bight, Chesapeake Bay, South Atlantic and Carolina DPS of Atlantic sturgeon are endangered; the Gulf of Maine DPS is threatened. Individuals originating from any of these DPS could occur in the project area.

Shortnose sturgeon (*Acipenser brevirostrum*) are present in the Chesapeake Bay and several of its tributaries have habitat characteristics such as hard bottom substrate and areas of high flow that may be suitable for spawning. These include the Gunpowder, James, York, Susquehanna and Potomac Rivers. Shortnose sturgeon are endangered throughout their range.

Depending on habitat conditions at the project site (e.g., depth, substrate type, benthic resources present), sturgeon may occur in the project area and a consultation pursuant to section 7 of the ESA may be necessary. As project details develop, we recommend you consider the following effects of the projects on sturgeon:

- Effects of increased suspended sediment;
- Suspension of contaminated sediment;
- Discharge of any other pollutant;
- Loss of prey; and
- Any impacts to habitat or conditions that make affected water bodies less suitable for these species.

Because listed species of sturgeon may occur within the vicinity of your proposed project, any proposed in-water work has the potential to impact these species. Depending on final project design we recommend you consider the following Best Management Practices to minimize and avoid impacts to listed species:

- For any impacts to habitat or conditions that temporarily render affected water bodies unsuitable for the above-mentioned species, consider the use of timing restrictions for in-water work.
- For activities that increase levels of suspended sediment, consider the use of silt management and/or soil erosion best practices (e.g., silt curtains and/or cofferdams).
- For pile driving or other activities that may affect underwater noise levels, consider the use of cushion blocks, bubble curtain, and other noise attenuating tools.
- For work that will increase vessel traffic within the project area, consider restricting the number of trips taken by each vessel and restricting the speed at which the vessel can travel.

If you have any questions regarding these comments, please feel free to contact me (410-573-4592 or brian.d.hopper@noaa.gov).

Regards,
-Brian

On Fri, Apr 21, 2017 at 12:31 PM, Nikki Radke <nradke@straughanenvironmental.com> wrote:

Good afternoon Kristy, Brian, and Christine:

The Maryland Transportation Authority (MDTA) and the City of Baltimore is proposing a suite of improvements to the I-95 ramps and other transportation facilities over the Middle Branch of the Patapsco River and near Gwynns Falls in Baltimore City, Maryland. A map of the area is attached for your reference.

We request any information concerning federally listed or endangered marine species or habitat that may occur in the study area. If you have any questions or need additional information regarding this request, please feel free to contact me.

NIKKI RADKE, M.S.

ENVIRONMENTAL SCIENTIST

STRAUGHAN ENVIRONMENTAL, INC.

10245 OLD COLUMBIA ROAD | COLUMBIA, MD 21046

DIRECT: [443.539.2521](tel:443.539.2521) | FAX: [301.362.9245](tel:301.362.9245)

www.straughanenvironmental.com

...creating a sustainable world

--
Brian D. Hopper
Protected Resources Division

NOAA Fisheries
Greater Atlantic Regional Fisheries Office
177 Admiral Cochrane Dr.
Annapolis, MD 21401
(410) 573-4592
Brian.D.Hopper@noaa.gov
<http://www.greateratlantic.fisheries.noaa.gov/>



Nikki Radke

From: Kristy Beard - NOAA Federal <kristy.beard@noaa.gov>
Sent: Wednesday, May 3, 2017 11:01 AM
To: Nikki Radke
Cc: Chimere Lesane-Matthews
Subject: Re: FW: I-95 Access Improvements project

Hi Nikki,

Yes, the habitat exists in the study area, but it's not preferred habitat for them and I only really comment on impacts to their prey species in that area.

My focus for the project will be on minimizing impacts to anadromous fish. The Patapsco River provides habitat for a variety of NOAA trust resources such as anadromous fish that would migrate past the project area for spawning. Efforts should be made to avoid and minimize adverse effects to the aquatic environment. Best management practices should be used to minimize the release of suspended sediment in the waterway and acoustic impacts to fish in the area. Depending on what in-water work is planned, time of year restrictions (February 15 through June 15) may be necessary during anadromous fish migration and spawning. Other BMPs such as bubble curtains to minimize sound impacts from pile driving may also be recommended, depending on the work proposed.

Thanks!
Kristy

On Tue, May 2, 2017 at 2:29 PM, Nikki Radke <nradke@straughanenvironmental.com> wrote:

Good afternoon Kristy and Christine,

I'm following up on the email I sent a few weeks ago to see if there was any additional concerns or relevant information about RTE species or habitat in our project area. I've attached a map of the I-95 study area for your reference.

Kristy,

I also attached a screenshot of the EFH online map. The Data Query Tool listed EFH for window pane flounder, summer flounder, and bluefish. Could you confirm that habitat for these species would occur within our study area?

Thank you,

Nikki

NIKKI RADKE, M.S.

ENVIRONMENTAL SCIENTIST

STRAUGHAN ENVIRONMENTAL, INC.

10245 OLD COLUMBIA ROAD | COLUMBIA, MD 21046

DIRECT: [443.539.2521](tel:443.539.2521) | FAX: [301.362.9245](tel:301.362.9245)

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From: Nikki Radke

Sent: Friday, April 21, 2017 12:31 PM

To: 'Kristy Beard - NOAA Federal' <kristy.beard@noaa.gov>; Brian D Hopper <brian.d.hopper@noaa.gov>; Christine Vaccaro - NOAA Federal <christine.vaccaro@noaa.gov>

Cc: Chimere Lesane-Matthews <cl@straughanenvironmental.com>

Subject: RE: I-95 Access Improvements project

Good afternoon Kristy, Brian, and Christine:

The Maryland Transportation Authority (MDTA) and the City of Baltimore is proposing a suite of improvements to the I-95 ramps and other transportation facilities over the Middle Branch of the Patapsco River and near Gwynns Falls in Baltimore City, Maryland. A map of the area is attached for your reference.

We request any information concerning federally listed or endangered marine species or habitat that may occur in the study area. If you have any questions or need additional information regarding this request, please feel free to contact me.

NIKKI RADKE, M.S.

ENVIRONMENTAL SCIENTIST

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...creating a sustainable world

--

*Kristy Beard
Marine Habitat Resource Specialist
Habitat Conservation Division*

*NOAA Fisheries
177 Admiral Cochrane Drive
Annapolis, MD 21401
410-573-4542*

<http://www.nmfs.noaa.gov/>



Maryland
Transportation
Authority

Larry Hogan
Governor

Boyd K. Rutherford
Lt. Governor

Pete K. Rahn
Chairman

Katherine Bays Armstrong
Peter J. Basso
William H. Cox, Jr.
William C. Ensor, III
W. Lee Gaines, Jr.
William K. Hellmann
Randall Nixon
John Von Paris

Milt Chaffee
Executive Director

2310 Broening Highway
Baltimore MD 21224
410-537-1000
410-537-1003 (fax)
711 (MD Relay)
1-866-713-1596

e-mail: mdta@mdta.maryland.gov

www.mdtta.maryland.gov

September 9, 2016

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
Division of Historic and Cultural Programs
100 Community Place
Crownsville, MD 21032-2023

ATTN: Beth Cole, Administrator
Review and Compliance

**RE: Section 106 Initiation of Consultation
I-95 Access Improvements, Caton Avenue to Fort McHenry Tunnel
Environmental Assessment
Baltimore City, Maryland**

Dear Ms. Hughes:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of federal funds from the Federal Highway Administration to prepare planning studies for a suite of improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities to support existing and planned development in the Port Covington area of Baltimore City, Maryland (**Figure 1**). The purpose of this letter is to initiate consultation pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), identify potential consulting parties, and delineate a proposed area of potential effects (APE) for your review and comment.

As shown in **Figure 1**, the study area generally follows the northern boundary of the Port Covington peninsula and includes the I-95 corridor. In addition, the improvements extend to several City streets (Hanover Street, McComas Street and Key Highway), pedestrian facilities, and the CSX Railroad tracks.

Project Alternatives

Four alternatives for transportation improvements have been developed for the project. Each alternative is composed of eight project elements with various options for improvements. Proposed improvements associated with the three Build alternatives (Alternatives 2, 3, and 4) would accommodate planned growth at Port Covington, a key growth cluster, while maintaining the functionality of the local and regional transportation system and enhancing multi-modal connections around and across I-95.

The eight project elements and options include:

Element A: I-95 Northbound Off Ramps

- Option 1: Maintain the Existing Hanover Street and McComas Street Ramps
- Option 2: Provide a Spur Ramp from Hanover Street Ramp to McComas Street
- Option 3: Relocate the Hanover Street Ramp – New Exit
- Option 4: Relocate the Hanover Street Ramp – A-B Exits
- Option 5: Complete the Hanover Street Interchange
- Option 6: Modify the McComas Street Off Ramp

Element B: I-95 Northbound On Ramp

- Option 1: Maintain the Existing Ramp
- Option 2: Construct an Additional On Ramp from Hanover Street
- Option 3: Construct a New Additional On Ramp

Element C: I-95 Southbound Off Ramp

- Option 1: Maintain the Existing Ramp
- Option 2: Improve the Existing Ramp
- Option 3: Provide a Two Lane Exit
- Option 4: Provide an Additional I-95 Southbound Off Ramp from the Existing Ramp
- Option 5: Provide an Additional I-95 Southbound Off Ramp from a New Location

Element D: I-95 Southbound On Ramps

- Option 1: Maintain the Existing Ramps
- Option 2: Widen the Existing Hanover Street Ramp
- Option 3: Provide Roundabout along Hanover Street
- Option 4: Reconstruct the Existing Ramp to Lengthen the Weave

Element E: Hanover Street

- Option 1: Maintain Existing Hanover Street Grade
- Option 2: Reconstruct Hanover Street

Element F: McComas Street

- Option 1: Maintain One Way McComas Street
- Option 2: Construct Two Way McComas Street

Element G: Pedestrians and Bicycles

- Option 1: Maintain Existing Pedestrian Connections
- Option 2: Construct Additional Pedestrian Connection to South Baltimore

Element H: CSX

- Option 1: Modify CSX Tracks South of McComas Street
- Option 2: Remove CSX Tracks South of McComas Street

Proposed Area of Potential Effects (APE)

Under Section 106, the proposed APE is defined in 36 CFR Part 800.16(d) as follows: “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The APE for archaeological resources comprises the geographic area in which the ground surface is physically impacted by the project, referred to as the project limits of disturbance (LOD). To account for possible project changes, the current archaeological APE has been defined as a 100-foot buffer surrounding the LOD.

The APE for architectural historic resources includes the area in which the project may directly or indirectly cause changes in the character or use of historic properties, if they exist. This includes the entire area comprising the archaeological APE. To account for potential visual, atmospheric, or audible effects, the APE for architectural historic resources also extends beyond the actual construction limits of the project to include those properties that may be affected by visual changes or patterns of use, or may experience a change in historic character associated with the proposed undertaking. Because project impacts are limited mainly to the existing elevated I-95 right-of-way, and because of the relatively dense development comprising the project corridor, possible visual, atmospheric, and audible impacts beyond the tax parcels immediately abutting the road right-of-way, are expected to be negligible. Generally, the architectural APE combines the LOD and all overlapping parcels, in order to take into account the full potential effects on an entire resource.

The recommended APEs do not include the entirety of the Sagamore Development Company’s proposed Port Covington Development. The development will take place regardless of the undertaking outlined here. The MDTA understands that potential impacts to historic resources located inside the boundaries of the Port Covington Development will be addressed as part of a separate investigation in conjunction with the proposed development. The recommended APEs for both architectural and archeological resources are delineated in **Figure 2**.

MDTA has also attached a list of identified consulting parties to participate in the Section 106 consultation process (**Attachment A**).

Next Steps

The MDTA requests your review and concurrence of the proposed APE delineations and list of recommended consulting parties. The MDTA would be happy to provide MHT with any additional information or justification for the enclosed and would be happy to consult directly with your office concerning the project. To aid in our studies, we also cordially request any information your office may have regarding historic properties.

Ms. Elizabeth Hughes
RE: Section 106 Initiation of Consultation
Maryland Transportation Authority and City of Baltimore
I-95 Access Improvements, Caton Avenue to Fort McHenry Tunnel
September 9, 2016
Page 4

We look forward to working with you as we develop this exciting project in support of the proposed development at Port Covington. If you have any questions concerning the project or the information presented, please contact me directly at 410-537-5650 or our cultural resources consultant, Sarah Michailof at Straughan Environmental, Inc. She can be reached at 443-539-2522 or smichailof@straughanenvironmental.com.

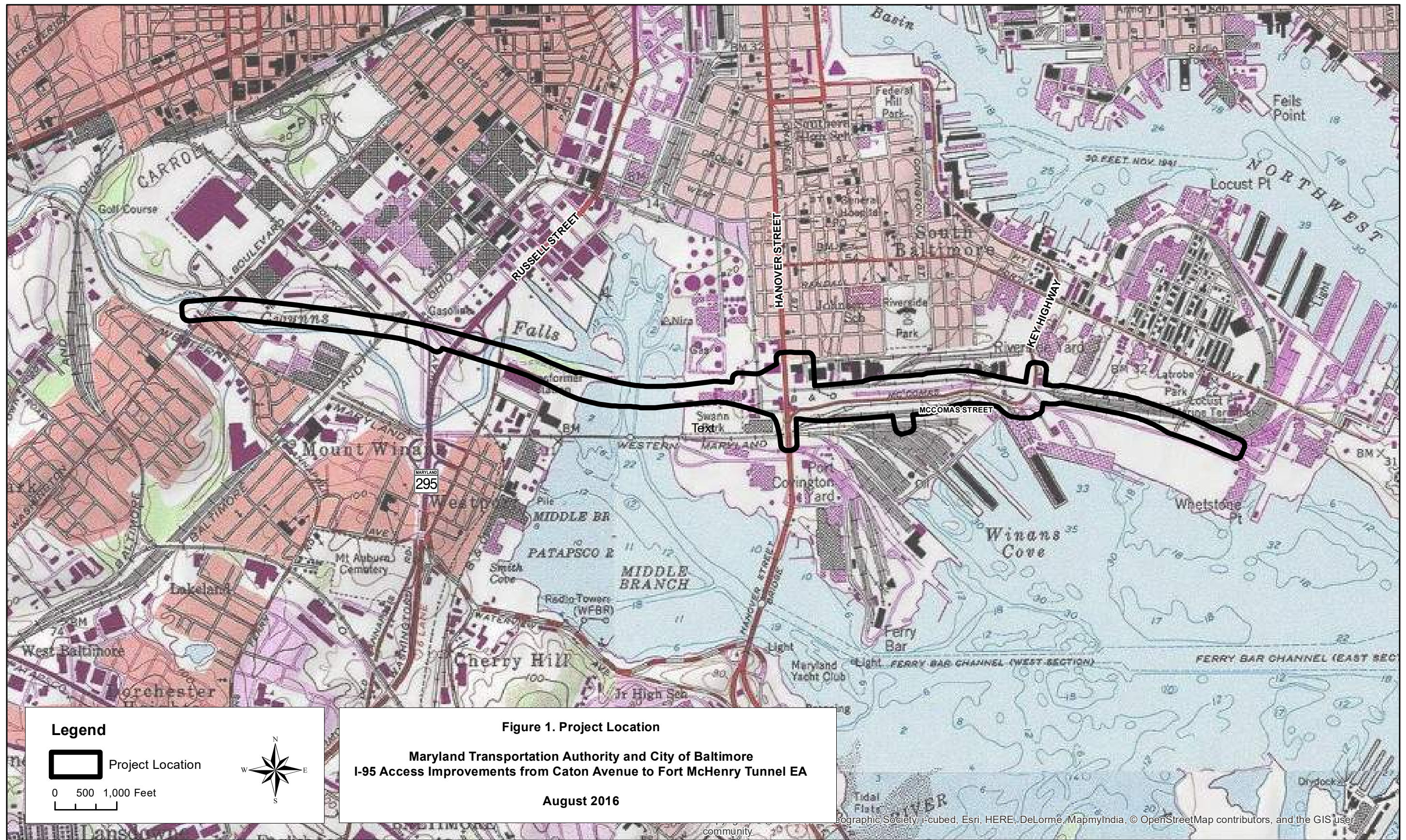
Sincerely,

A handwritten signature in blue ink, appearing to read "D. Simpson".

Dennis Simpson
Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosures and Attachments

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
Christina Alexiou-Hidalgo, NEPA Project Manager, STV, Inc.
Mark Cheskey, PB (on behalf of Baltimore City Department of Transportation)
Eric Almquist, RK&K (on behalf of MDTA)



Legend


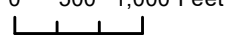
 Project Location
 0 500 1,000 Feet




Figure 1. Project Location

**Maryland Transportation Authority and City of Baltimore
 I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel EA**

August 2016

Geographic Society, i-cubed, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community.

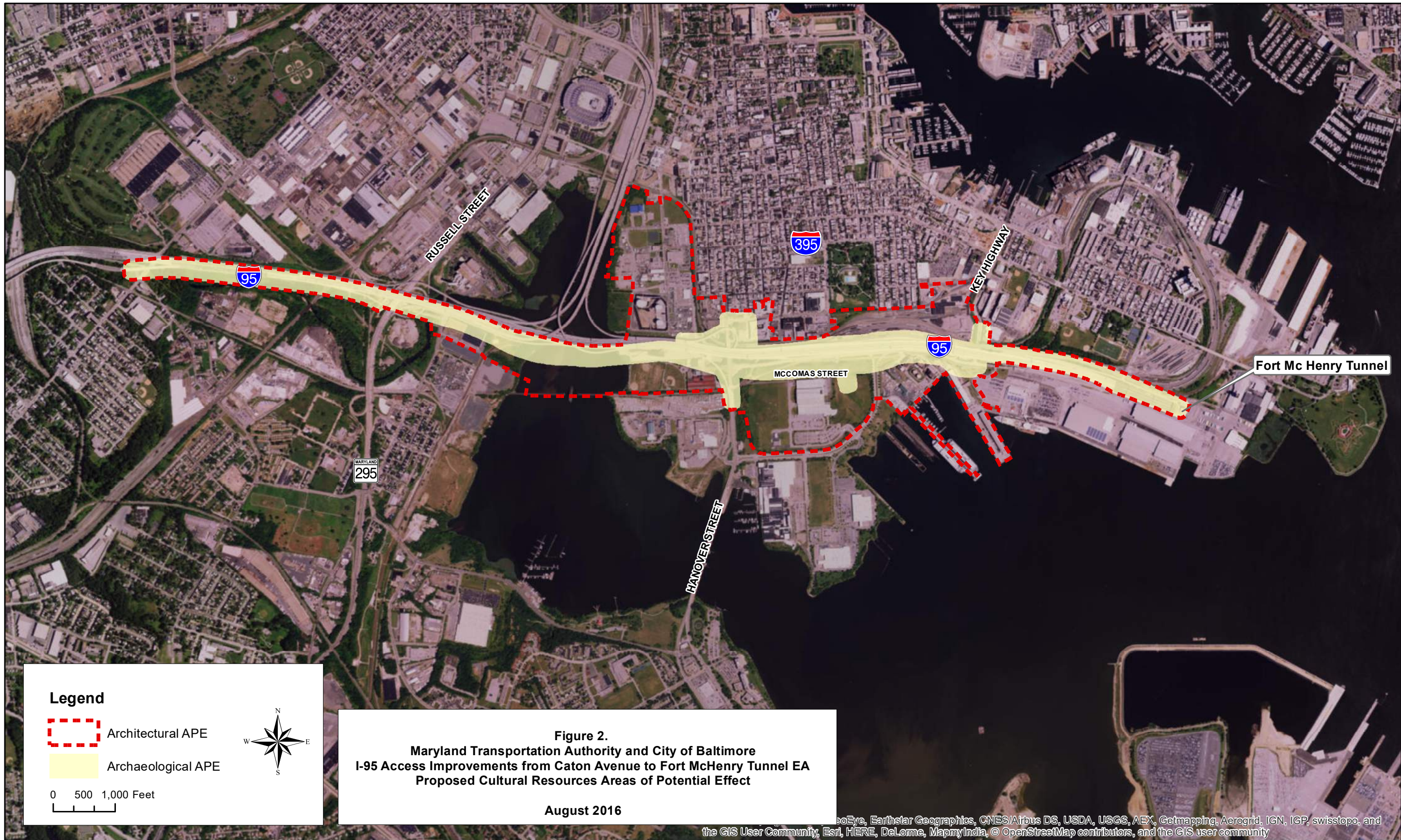


Figure 2.
Maryland Transportation Authority and City of Baltimore
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel EA
Proposed Cultural Resources Areas of Potential Effect
August 2016

GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community

Attachment A

Section 106 Initiation and Consultation

I-95 Access Improvements, Caton Avenue to Fort McHenry Tunnel

Environmental Assessment

Baltimore City, Maryland

List of Proposed Section 106 Consulting Parties

Federal Agencies

US Army Corps of Engineers

Baltimore District

City Crescent Building

10 South Howard Street

Baltimore, MD 21201

ATTN: Joseph P. DaVia, Chief, Maryland Section Northern

(410) 962-5691

National Park Service

Fort McHenry National Monument and Historic Shrine

2400 East Fort Avenue

Baltimore, MD 21230

ATTN: Tina Cappetta, Superintendent

(410) 962-4290

Indian Tribes

Haudenosaunee Tribes

Jesse Bergevin, Historic Resources Specialist

2037 Dream Catcher Plaza

Oneida, NY 13421-0662

(315) 829-8463

(315) 829-8473 Fax

jbergevin@oneida-nation.org

Anthony Gonyea, Faithkeeper (Beaver Clan)

Onondaga Nation

RR #1, Box 245

Nedrow, NY 13120

(315) 952-3109

ononcomm@gmail.com

(requests hard copy)

Mr. Arnold Printup, THPO
Saint Regis Mohawk Tribe
412 State Route 37
Akwesasne, NY 13655
(518) 358-2272 ext. 164
(518) 358-3203 FAX
arnold.printup@srmt-nsn.gov

Paul Barton, THPO
Seneca Cayuga Tribe of Oklahoma
23701 South 655 Road
Grove, OK 74344
(918) 787-7979
pbarton@sctribe.com

Delaware Tribes

Ms. Susan Bachor
Delaware Tribe Historic Preservation Representative
P.O. Box 64
Pocono Lake, PA 18347
(610) 761-7452
temple@delawaretribe.org

Shawnee Tribes

Leonard Longhorn
Cultural Preservation Director/ THPO
Absentee-Shawnee Tribe of Oklahoma
2025 S. Gordon Cooper Dr
Shawnee, Oklahoma 74801
(405) 275-4030 ext. 203
(405) 878-4711 FAX
llonghorn@astribe.com

Ms. Robin Dushane, THPO
Cultural Preservation Director
Eastern Shawnee Tribe of Oklahoma
12705 South 705 Road
Wyandotte, OK 74370
(918) 666-2435 ext. 1845
(918) 533-4101 cell
(918) 533-4104 FAX
rdushane@estoo.net

Ms. Kim Jumper, THPO
Shawnee Tribe
P. O. Box 189
29 S Hwy 69A
Miami, OK 74355
(918) 542-2441
(918) 542-2922
kim.jumper@shawnee-tribe.com

Local Government and Local Preservation Groups

Baltimore City Commission for Historical & Architectural Preservation
417 East Fayette Street, 8th floor
Baltimore, MD 21202
ATTN: Eric Holcomb, Executive Director
eric.holcomb@baltimorecity.gov
(410) 396-4866

Baltimore City Department of Transportation
417 E. Fayette Street
5th Floor
Baltimore, MD 21202
(410) 396-6802
ATTN: Frank Murphy, Acting Director

Baltimore City Department of Planning
417 E. Fayette Street, 8th Floor
Baltimore, MD 21202
ATTN: Thomas J. Stosur, Director
deptofplanning@baltimorecity.gov
(410) 396-7526

Baltimore Heritage
11 1/2 West Chase Street
Baltimore, MD 21201
ATTN: Johns Hopkins, Executive Director
hopkins@baltimoreheritage.org
(410) 332-9992

Western Maryland Railway Historical Society
99 Shenandoah View Drive
Harpers Ferry WV 25425
ATTN: Kenneth (Ken) G. Mazer, President/Chairman of the Board
ken.wmrhs@comcast.net

E. Keith Colston, Administrative Director
Maryland Commission on Indian Affairs
301 West Preston Street
Suite 1500
Baltimore, MD 21201
keith.colston@maryland.gov
(410) 767-7631



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Wendi W. Peters, Secretary
Ewing McDowell, Deputy Secretary

November 9, 2016

Dennis Simpson
Director, Division of Project Planning & Program Development
Maryland Transportation Authority
2310 Broening Highway
Baltimore, MD 21224

Re: I-95 Access Improvements, Caton Avenue to Fort McHenry Tunnel
Initiation of Section 106 Consultation
Baltimore City, Maryland

Dear Mr. Simpson:

Thank you for your recent letter regarding the above-referenced project. Your submittal formally initiated consultation with the Trust, Maryland's State Historic Preservation Office, pursuant to Section 106 of the National Historic Preservation Act, for this federally assisted undertaking. Based on our review of the submitted materials, we offer the following comments and concurrence.

The Maryland Transportation Authority (MDTA) is proposing a suite of improvements to Interstate 95, ramps, connecting roads and other transportation facilities to support development in the Port Covington area of Baltimore City. The project study area generally includes the northern boundary of the Port Covington peninsula along the I-95 corridor between Washington Boulevard and the Fort McHenry Tunnel.

Based on the four existing alternatives developed for the undertaking, MDTA has delineated an Area of Potential Effects (APE) for historic architectural and archeological resources. The Trust agrees with the defined APE as described in your letter and illustrated in Figure 2 of your submittal. We recognize that MDTA may make further refinements to its APEs as planning proceeds based on alignment changes, the addition of ancillary actions, or other modifications.

MDTA also requested the Trust's assistance identifying potential consulting parties for this undertaking. We agree that Attachment A to MDTA's letter identifies appropriate consulting parties. We also suggest that MDTA include the Baltimore National Heritage Area and Preservation Maryland as consulting parties. As the Section 106 coordination and public outreach efforts progress, additional relevant parties may be identified and invited to participate in the consultation.

We look forward to ongoing consultation with MDTA and other involved parties to successfully complete the Section 106 consultation for this undertaking as project planning proceeds. If you have questions or need further assistance, please contact me (for historic structures) at tim.tamburrino@maryland.gov / 410-514-7637 or Beth Cole (for archeology) at beth.cole@maryland.gov / 410-514-7631. Thank you for providing us this opportunity to comment.

Sincerely,

Tim Tamburrino
Preservation Officer, Project Review and Compliance
TJT/201604309



S T R A U G H A N
E N V I R O N M E N T A L

Date: December 19, 2016

To: Beth Cole, Administrator, Review and Compliance
Maryland Historical Trust

From: Sarah Michailof, Cultural Resource Specialist
Straughan Environmental, Inc.

**RE: Assessment of Potential for Cultural Resources, Request for Expedited Review
Federal Highway Administration, Maryland Transportation Authority, and City of Baltimore
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Ms. Cole:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore, proposes a number of roadway improvements of the Interstate 95 (I-95) ramps as well as other transportation facilities to support existing and planned development in the Port Covington area of Baltimore. The proposed work would include improvements to the I-95 ramps, changes to Hanover Street and McComas Street, and potential changes to pedestrian connections to Port Covington. Consultation is being conducted pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800). Section 106 consultation was initiated on September 9, 2016 with the Maryland Historical Trust. This Assessment of Potential submittal is being sent to the stakeholders listed in Attachment A of the MHT Initiation Letter that is included in **Appendix A** in addition to the Baltimore Heritage Area Association and Preservation Maryland.

This memo, prepared by Straughan Environmental, Inc. (Straughan) on behalf of the MDTA, identifies cultural resources within the archeological and architectural Area of Potential Effects (APEs) associated with each alternative for ramp improvements, assesses the potential for the alternatives to impact known historic properties, and provides recommendations for further identification and evaluation efforts. MDTA anticipates the use of FASTLANE grant funds from the Federal Highway Administration (FHWA) to prepare planning studies for the proposed improvements.

Area of Potential Effects

MDTA initially proposed an APE for architectural and archeological resources in its Section 106 initiation letter with the Maryland Historical Trust (MHT) dated September 9, 2016. On November 9, 2016, MHT provided concurrence for our approach to delineating the archeological and architectural

APEs. The strategy for defining the APE remains unchanged. Since our September correspondence, MDTA has developed plan view mapping for each alternative. For each alternative, the archeological APE includes the anticipated limits of physical disturbance and is shown by the orange shaded area on the APE maps (see Figures 1, 2, and 3). The architectural APE for above ground cultural resources considers where physical disturbance could occur and accounts for possible visual, atmospheric, and audible effects of proposed improvements. The architectural APE for each alternative includes the area within the black and white dashed line on Figures 1, 2, and 3. The APEs continue to be subject to modification as project alternatives develop.

Background Research

Environmental Setting and Soils. The proposed project is located in South Baltimore and extends along I-95 from Washington Boulevard/Alternate Route 1 (Exit 51) northwards to the Fort McHenry Tunnel in Locust Point. The southern project area is located along the north bank of Gwynns Falls and extends northwards through Westport, across the Middle Branch of the Patapsco River and the Port Covington peninsula and Locust Point. The entire project area is in a historically heavily industrialized area – from the mills and iron works along Gwynns Falls, to the manufacturers of glass, iron, and tinware in Westport and Port Covington, and the transportation infrastructure that moves people and goods into and out of Baltimore. The shoreline along the Middle Branch, in particular, has been subject to episodes of land reclamation that have resulted in the placing of deep levels of fill soils throughout the project area. Most the archeological and architectural APE contains pavement, impervious surfaces, or water.

Soils within the APE include udorthents, urban land, and an urban land-udorthents complex. The majority of the APE contains urban land (44UC). Urban land consists of areas where more than 80 percent of the surface is covered by asphalt, concrete, buildings, or other impervious surfaces. Udorthents are fill materials and cover the remainder of the project area. The soil map and soil descriptions are included in **Appendix B**.

Historic Map Research. Historical maps from the late eighteenth century onwards and aerial photography document the growth of transportation and industry on the south side of Baltimore. The historic maps referenced in this section are included in **Appendix C**. From south to north, the project area traverses the Gwynns Falls Valley, a focus of early industry, including mills, an ironworks, stockyards, brickyards, and breweries; the Middle Branch of the Patapsco River; and the Port Covington and Locust Point peninsulas, where ports historically facilitated the transport of goods along the Baltimore & Ohio (B&O) Railroad and Western Maryland Railway (WM).

One of the earliest maps that show any detail within the project area is Dennis Griffith's 1795 Map of the State of Maryland (Appendix C, Figure C-1). This map documents the location of grist mills owned by Charles Carroll on the north bank of Gwynns Falls and the Baltimore Iron Works on the south side

of Gwynns Falls. West of the project area, the predecessor to the Washington and Baltimore Road (US Route 1) is present. Another road extends along Locust (then Whetstone) Point, ending at a ferry landing. Fort Whetstone, constructed in 1776 in the present location of Fort McHenry, is shown at the eastern end of the peninsula.

By 1845, despite the strong growth of Baltimore to the north of the APE, the *Map of Baltimore Harbour & City* (U.S. Coast Survey; Appendix C, Figure C-2) indicates that South Baltimore remains rural. It is crossed by important north-south transportation routes into Baltimore, including the predecessors of Washington Boulevard, Annapolis Road, and a road leading south out of Baltimore to Ferry Bar at the southern tip of Port Covington. The B&O Railroad skirts around the western extent of the project area, joining Baltimore with points west. One structure, the Long Bridge that carries Annapolis Road over Gwynns Falls, crosses the APE. North of the bridge, a tollhouse is located on the east side of the road. Along Gwynns Falls west of the study area, a few mills are shown. On the south side of Gwynns Falls, east of the Baltimore and Washington Road, other structures are shown beyond the study area. One of these structures may be the furnace associated with the Baltimore Iron Works which was located on the south bank of Gwynns Falls along Charles Run, a tributary that flowed into Gwynns Falls from the south. On the 1845 map, Charles Run is the first tributary of Gwynns Falls that is shown east of the Baltimore and Washington Road.

Sidney's 1857 Map of the City and County of Baltimore (Appendix C, Figure C-3) documents Baltimore's rise as a market center, with turnpikes and railroads radiating from the city center. The map does not depict additional development in the project area, although it does not show much detail in the vicinity of Port Covington and Locust Point. It does show additional development along the Baltimore and Washington Road and the extension of the B&O Railroad into Locust Point.

By 1878, G. M. Hopkin's Atlas of Fifteen Miles Around Baltimore (Appendix C, Figure C-4) documents extensive B&O railroad improvements in Locust Point and the subsequent development of the Riverside neighborhood and Riverside Park. The railroad connected to new points primarily on the north side of Locust Point, but also to one on the Port Covington waterfront.

The last decades of the nineteenth century resulted in significant industrial and residential development within the APE. In the southern extent of the APE, detailed topographical mapping for Baltimore City produced in 1897 (Appendix C, Figure C-5) indicates that in the vicinity of the southern APE, brickyards lined both sides of Washington Boulevard (then called Washington Avenue). Further east along the north bank of Gwynns Falls was a glue factory. By 1898, on the south side of Gwynns Falls, and immediately east of Washington Avenue, a city grid and lots had been laid out along Main (later Maisel), Sycamore, Bremen, Berlin and Arnold Streets in the Mount Winans community. The lots were sparsely developed with both row and detached houses. Further east, much of the APE crossed marshland. The north side of Westport, where the APE currently crosses the Maryland Transit

Administration light rail line and an area of scrubby vegetation, was an area of open water in 1897. On Port Covington, the APE crosses an area that was in the process of developing with rowhouses, and the APE is located immediately south and possibly partially on top of industries including the White & Middleton Gas Engine Company; the Baltimore Malleable Iron and Steel Casting Company; Matthai, Ingram & Company (makers of tinware); and a B&O Railroad Roundhouse and Shop. East of Port Covington, much of the APE was located within marshland or open water, on the south side of B&O railroad tracks leading to the Locust Point Yard. The APE crossed an area of filled land jutting southwards from the south side of Locust Point, which contained the Zell Guano Company and the Detrick Fertilizer Company.

The first half of the twentieth century was marked by increasing industrialization throughout the APE, as documented in 1927 and 1959 aerial photography (Appendix C, Figure C-6, Chesapeake Aircraft Company 1927; Appendix C, Figure C-7, United States Geological Survey [USGS] 1959). The neighborhood of Mount Winans at the southern extent of the APE is fully built out with industrial facilities stretched along the south bank of Gwynns Falls. The WM Railway extends from the west, across the Middle Branch on the Spring Garden Swing Arm Bridge, to Port Covington with its extensive port facilities, including coal piers, grain elevators, and warehouses. Extensive filling of land on the north side of Westport and also on the south side of Locust Point, where the South Locust Point Marine Terminal is now located, has occurred and the Westport waterfront contains industrial facilities such as the Carr Lowery Glass Company and a BGE Power Plant. Between 1927 and 1959, two new major road improvements were made. Russell Street was constructed along the west side of the Middle Branch, and Hanover Street was raised to pass over the expanding rail terminal at Port Covington, tying into the Hanover Street Bridge, which was constructed in 1916 to join south Baltimore with Anne Arundel County.

The second half of the twentieth century saw additional road improvements in the APE including interchange improvements to MD 295/Russell Street at Monroe Street. Most notably, I-95 was constructed in Baltimore City, with construction spanning the years 1978 to 1985, when the Fort McHenry Tunnel opened (Kozel 2007). Within the APE, the highway was constructed on an elevated bridge structure from a point west of the MD 295/Russell Street interchange to the Fort McHenry Tunnel. Several structures were removed from the vicinity of the APE, including several blocks of the northern section of Mount Winans, bounded by Hollins Ferry Road, Washington Boulevard, the south bank of Gwynns Falls, and Berlin Street (Appendix C, Figure C-8). The parcels in this area are currently owned by the City of Baltimore as Maisel Street Park, although no park development has occurred.

On Port Covington, additional land reclamation activities took place on the shoreline between 1959 and 1970 between the WM Railway and Hanover Street Bridge (Appendix C, Figure C-8). The filling episode appears to have resulted in the removal of piers and several small structures and allowed the construction of a large warehouse and storage yard. By 1974, Port Covington's last land reclamation

project was complete on the south side of Locust Point, west of Fort McHenry, allowing the construction of the South Locust Point Marine Terminal. In the 1970s, once the WM Railway was absorbed into the Chessie system (which eventually became CSX), the rail yard was no longer needed. The rails and port-associated structures were removed in the 1980s (MDHS 2016). The former rail terminal has been partially redeveloped as the Baltimore Sun Headquarters and as an industrial park (Appendix C, Figure C-9).

Previously Identified Resources

On August 3, 2016, Straughan obtained information on existing historic and archeological resources within the APE from the MHT's Cultural Resources GIS and associated cultural resource databases at the MHT Library. These databases include information on sites and properties listed on or eligible for listing in the National Register of Historic Places (NRHP).

Archeological Resources

One archeological survey has been conducted partially within the archeological APE of each alternative. Stephen Austin of the Baltimore Center for Urban Archeology completed archeological investigations at the site of the proposed Port Covington Commons Business Park in 1990. Archeological investigations demonstrated that the Port Covington Rail Terminal was constructed on fill, with potential for archeological sites at a subsurface depth of 8-10 feet. The Port Covington archeological site (18BC72), south of the APE, representing the remnants of a mid- to late nineteenth-century industrial building, was identified in machine-excavated trenches that were 10-feet wide and up to 12-feet deep. Investigators recommended further survey, finding the Port Covington area in general to have high potential to contain other nineteenth-century industrial sites.

Within half-mile of the APE, seven archeological resources, including 18BC72, have been identified. The site number, name, site type, and additional information regarding the archeological sites are included in **Table 1**.

TABLE 1. ARCHEOLOGICAL SITES IDENTIFIED WITHIN HALF A MILE OF THE CORRIDOR

Site Number	Site Name	Site Type	Cultural Affiliation	Type of Investigation	NRHP Eligibility	Within APE?	Approximate Distance from Archeological APE (feet)
18BC10	Mount Clare	Shell midden, estate with brick mansion, gardens, and orchards	Early Woodland, Middle Woodland, Early 18 th – Early 20 th Century	Phase II/ Site Testing and Phase III/ Excavation	Unevaluated	No	2,290
18BC110	Governor McLane Shipwreck	Shipwrecks and shipyard	Late 19 th – Early 20 th Century	Phase I/ Reconnaissance	Eligible	No	1,550

Site Number	Site Name	Site Type	Cultural Affiliation	Type of Investigation	NRHP Eligibility	Within APE?	Approximate Distance from Archeological APE (feet)
18BC34	Gwin	Lithic scatter, artifact scatter	Prehistoric Unknown, Historic Unknown	Phase I/ Reconnaissance and Phase II/ Site Testing	Not Eligible	No	2,020
18BC39	Baltimore Clay Pipe Works	Clay tobacco pipe factory	Late 19 th Century	Report from Informant	Unevaluated	No	390
18BC61	Bombardment of Baltimore	Naval battlefield, four shipwrecks	18 th – 20 th Century	Phase I/ Reconnaissance, Phase II/ Site Testing	Unevaluated	No	1,180
18BC72	Port Covington	Industrial building	Mid - Late 19 th Century	Phase I/ Reconnaissance	Unevaluated	No	560
18BC86	MSA-09	Rowhouses	Late 19 th – Mid 20 th Century	Phase I/ Reconnaissance	Unevaluated	No	1,470

Architectural Resources

Although the APEs for each alternative vary geographically, they overlap where Maryland Inventory of Historic Properties (MIHP) properties and properties that are 45-plus years in age are present (as shown in Figures 1-3). Each alternative’s APE contains the same MIHP properties and structures that are 45-plus years in age.

MIHP Properties. Six architectural resources listed in the MIHP were identified within the architectural APE of each alternative. These include three resources which have not been evaluated for NRHP eligibility. The MIHP information is included in **Table 2**.

TABLE 2: MIHP PROPERTIES WITHIN THE ARCHITECTURAL APE OF EACH ALTERNATIVE

MIHP Number	Resource Name	NRHP Eligibility	Significance
B-1032	Baltimore Gas & Electric Spring Gardens Station	Unevaluated	N/A
B-1055	Lyon, Conklin and Company	Unevaluated	N/A
B-1067	Pabst Brewing Company (Maryland Glass and Mirror Company)	Unevaluated	N/A
B-1342	Westport Historic District	Eligible	Criterion A
B-3668	Spring Garden Bridge	Eligible	Criterion A & C
B-5139	Riverside Historic District	NRHP Listed	Criterion A & C

The Westport Historic District (B-1342) is significant under Criterion A as it relates to the expansion and growth of Baltimore’s industrial heritage throughout the early to mid-twentieth century. The district contains a variety of building types including rowhouses, low-rise commercial establishments, automobile-related structures, a firehouse, a school, and a former public library. Many of the industrial and manufacturing facilities, especially those along the Middle Branch waterfront have been

razed. While some of the buildings remain in fair to good condition, much of the architectural fabric of the neighborhood is deteriorated and many buildings have since been abandoned. Alterations to buildings are typical of those found in Baltimore’s older rowhouse neighborhoods and along automobile-related commercial corridors. The two-story commercial buildings were likely constructed as storefronts with residences located above. During the late nineteenth century, the end units of the rowhouses were designed with storefronts for corner stores (Walls, 2002).

The Spring Garden Bridge (B-3668) was determined NRHP-eligible under Criterion A for its association with the development of the rail transportation system in Maryland and the growth of Baltimore as an industrial power at the turn of the century. The Spring Garden Bridge is also significant under Criterion C for engineering (Lione, 2002).

The Riverside Historic District (B-5139) is significant under Criterion A for its association with the development of transportation and industry in Baltimore and is significant under Criterion C for its architecture, which is representative of the full range of domestic and ecclesiastical building types characteristic of Baltimore neighborhoods during the period from the mid-nineteenth century through the first decade of the twentieth century (Hayward 2007).

Structures that are 45-Plus Years Old. The typically-applied age criterion for eligibility for listing in the NRHP is 50 years at the time the project is completed, and common practice is to consider all properties that are 45-plus years in age during project planning, because they are likely to be approaching the 50- year age criterion by the time the project is under construction. The architectural APE contains buildings that are 45-plus years of age that are not included on the MIHP (per State Department of Assessments and Taxation data and/or further research), but are potentially historic. Properties that are 45-plus years in age are outlined in brown on **Figures 1, 2, and 3**. These properties, their address, and year built are included in **Table 3**.

TABLE 3: 45-PLUS YEAR OLD STRUCTURES WITHIN ARCHITECTURAL APE OF EACH ALTERNATIVE

Site Name	Address	Year Built
Howard Uniform Company	1915 Annapolis Road	1964
Swann Park	n/a	early 20th century
Gould Street Generating Station	2105 Gould Street	1900
TE Connectivity	1001 E McComas Street	1955
CSX Rail/Former B&O Railroad, including Riverside Railyard (B-5267), currently under study by others	n/a	prior to 1970
Middleton & Meads Co.	1900 S Hanover Street	1970
Downtown Dog Resort and Spa	200 West McComas Street	1960
201-213 McComas Street	201-213 McComas Street	1900

Field Reconnaissance and Archeological Assessment of Potential

Straughan completed field reconnaissance on September 23, 2016 to assess existing conditions near the APEs and the potential of the APEs to contain archeological and architectural resources requiring further investigation and evaluation for NRHP eligibility. Photographs are included in **Appendix D**. The following observations were made, presented from the southern portion of the APE and moving northwards:

- **I-95 between Washington Boulevard and Westport** – At the southernmost extent of the APE along the north bank of Gwynns Falls, the APE is within a steeply sloped area with evidence of extensive flood damage (Figures D-1, D-2, through D-4). A small portion of the APE associated with Alternative 4 is located within Maisel Street Park, on the east side of Washington Boulevard, bounded by Gwynns Falls to the north (Figure D-3). Late nineteenth century maps and twentieth century aerial photography have documented multiple structures in this area. If Alternative 4 is selected as the preferred alternative, Phase I shovel testing is recommended to identify whether any NRHP-eligible archeological resources are located within Maisel Street Park. On the west and east sides of the I-95/MD-295 interchange, the APE has been subject to filling of marshlands in the vicinity of the mouth of Gwynns Falls and grading associated with interstate and railroad construction (Figures D-5 through D-6). The APE on the east side of the MTA light rail line has also been graded; it appears that it may have been used as a staging area during road or light rail construction (Figures D-7 through D-11).
- **Middle Branch of the Patapsco River** – The Middle Branch of the Patapsco River was not visited as part of the field reconnaissance, because any resources would be below water and not visible.
- **Port Covington and East Locust Point** – Within the APE, Port Covington and Locust Point have been subject to land reclamation along its shoreline and filling associated with redevelopment of rail terminals, clearly indicated by review of historic maps and previous archeological investigations. The rail terminal was constructed on fill that has capped at least one industrial archeological site (18BC72) and investigators noted the potential for other archeological sites to exist below the fill placed for the rail terminal. Although most rail facilities have since been removed for development of McComas Street and the Baltimore Sun headquarters, there is moderate to high potential for industry-related archeological resources within the APE on Port Covington. Photos from the field reconnaissance are not

included as they don't illustrate the archeological resource potential within the APE on Port Covington.

Recommended Additional Study for Future Project Development Phases

Architectural Investigations. Within the architectural APE, Straughan recommends completion of 10 Determination of Eligibility (DOE) forms:

Seven DOE forms are required for the resources that are not included on the MIHP but are more than 45 years in age. All but two of these resources is clearly ineligible for the NRHP due either to integrity issues or undistinguished building types, and short form DOEs are proposed for those resources. Each resource requiring an eligibility determination, and the type of DOE proposed for each resource includes:

- Howard Uniform Company (short form)
- Swann Park (short form)
- Gould Street Generating Station (long form)
- TE Connectivity (short form)
- Middleton & Meads Co. (short form)
- Downtown Dog Resort and Spa (short form)
- 201-213 McComas Street (long form; Straughan recommends that this group of rowhomes be treated as one resource)

Three long form DOEs are required for the unevaluated resources included on the MIHP:

- Baltimore Gas & Electric Spring Gardens Station (B-1032)
- Lyon, Conklin and Company (B-1055)
- Pabst Brewing Company (B-1067)

No additional investigations are required for the three resources that are listed or determined eligible for the National Register of historic places, but effects will be assessed for these resources:

- Westport Historic District (B-1342)
- Spring Garden Bridge (B-3668)
- Riverside Historic District (B-5139)

The APEs for each alternative cross above rail lines or adjacent to rail lines that are more than 45 years old. These include the CSX Rail Line (formerly the B&O Railroad Main Line, the B&O Curtis Branch Railroad, and other segments of the B&O Railroad) and the abandoned WM Railway. Rail lines in the vicinity of the APE have been heavily modified and many structures (including railyards and at least one roundhouse) have been removed during the last century, resulting in loss of historic integrity. Because the APE is generally above rail lines (where located on the elevated I-95 viaduct) or adjacent

to rail lines, and because no rail modifications are proposed as part of the project, no survey or eligibility determinations of rail lines are proposed.

Archeological Investigations. Straughan recommends a combination of a geoaicheological survey and Phase I archeological field survey within the archeological APE in the following areas:

- **I-95 between Washington Boulevard and Westport** – Phase I archeological survey within the archeological APE associated with Maisel Street Park. Physical disturbance within Maisel Street Park would only occur with Alternative 4, and archeological survey would not be required with either Alternatives 2 or 3, unless later designs include use of the park for construction staging or other construction activities. If a Phase I archeological survey is required, the survey would involve additional documentary research, including deed research to assess past land uses and archeological potential. Phase I field investigations would likely involve pedestrian survey, mapping of surface features, and shovel testing.
- **Middle Branch of the Patapsco River** – All three Build Alternatives would involve construction of piers within the river. Therefore, a remote sensing survey (such as sonar) should be conducted by an underwater archeologist to determine whether objects such as sunken boats could be located within the archeological APE.
- **Port Covington and East Locust Point** – All three Build Alternatives propose improvements to East McComas Street between the western shore of Port Covington and Exit 55 of I-95, and the construction of bridge structures with deep piers. These areas of the archeological APE should be subject to geoaicheological survey, which may require interpretation of deep soil cores obtained via geoprobe, due to the anticipated depth of fill in this area. The geoaicheological survey would assess the potential for archeological resources to be located within intact soils below fill and would identify the depth at which those resources may be located and the potential for resources to be impacted during construction. The geoaicheological survey would be supplemented with additional documentary research, including deed research to assess past land uses and archeological potential. Depending on the results of the geoaicheological testing, additional Phase I archeological survey may be recommended within the archeological APE. Further east, all improvements are associated with roadway widening.

Next Steps

We propose completion of the following studies moving forward:

- Completion of geoaicheological survey on Port Covington and East Locust Point, and remote sensing survey of the portions of the APE within the Middle Branch of the Patapsco River as soon as surveys can be arranged.

- Supplemental deed research to further assess whether Phase I Investigation of Maisel Street Park is warranted.
- A combined architectural report that includes the DOE forms and assessment of effects. MDTA anticipates that a no adverse effects determination for the project is likely, and a combined report will allow reduction in the number of review periods that need to be incorporated into the schedule.
- Following completion of further documentary, remote sensing, and geoarcheological studies to assess archeological potential, a Phase I archeological investigation report would be completed to include the results of any required identification studies at Maisel Street Park, within the Middle Branch of the Patapsco River, and on the Port Covington/East Locust Point peninsula.

Please let me know if you have any questions or comments regarding our approach to cultural resource identification studies. If the approach meets with your approval, kindly provide written concurrence at your earliest convenience. Please contact me at smichailof@straughanenvironmental.com or 443-539-2522 if you need additional information regarding the I-95 Access Improvements project.

Sincerely,
STRAUGHAN ENVIRONMENTAL, INC.

Sarah Michailof
Cultural Resources Specialist

Attachments

CC: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
Christina Alexiou-Hidalgo, NEPA Project Manager, STV, Inc.
Erron Ramsey, RK&K (on behalf of MDTA)

References

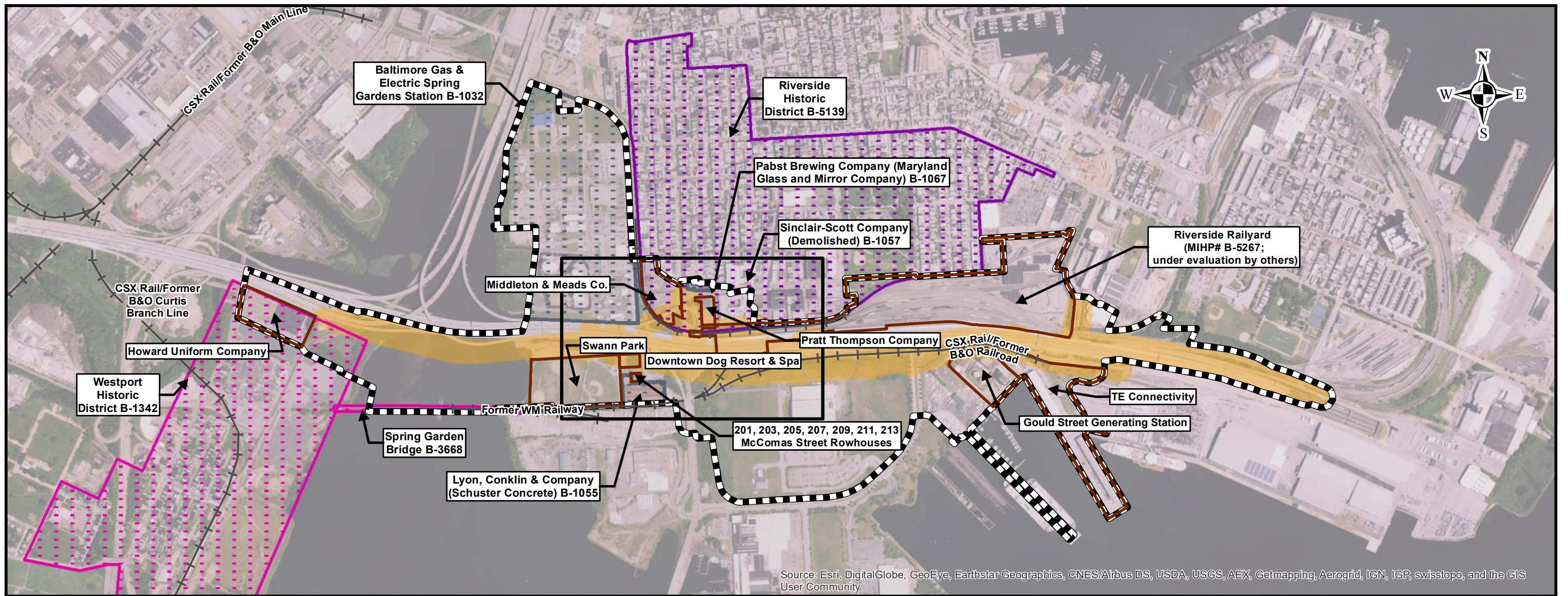
- Austin, Stephen. 1990. *An Investigation of the Archeological Resources Associated with the Port Covington Site (18BC72), Baltimore, Maryland*. Baltimore, MD: Baltimore Center for Urban Archeology.
- Chesapeake Aircraft Company. 1927. *Aerial Photographic Map of Baltimore and Metropolitan District of Baltimore County*.
- Duncan, Frank K., Thos. M. Ward, Malcolm A. Cudlipp, W.A. Wansleben, Frank K. Duncan, R.A. MacGregor and Wm. Bauman Jr. 1897. *Atlas of the City of Baltimore, MD*. Baltimore, MD: Hoen & Co.
- Google Earth version 7.1.5.1557. Baltimore City, Maryland. 39°16'10.49" N, 76°37'08.42" W, elevation 7 ft. Historical Imagery from April 3, 1994. Roads data layer, viewed September 19, 2016. <<http://www.google.com/earth/index.html>>.
- Griffith, Dennis. 1795. *Map of the State of Maryland*. Philadelphia, PA: J. Vallance.
- Hayward, Mary Ellen. 2007. Riverside Historic District. National Register of Historic Places Nomination Form. Accessed online at https://mht.maryland.gov/secure/medusa/PDF/NR_PDFs/NR-1463.pdf.
- Hopkins, G.M. 1878. *Atlas of Fifteen Miles Around Baltimore including Anne Arundel County, Maryland*. Philadelphia, PA: G.M. Hopkins.
- Kozel, Stephen M. Roads to the Future: Highway and Transportation History Website. <http://www.roadstothefuture.com/main.html>.
- Lione, Brian Michael. 2002. *Spring Garden Swing Bridge*, Maryland Historical Trust Determination of Eligibility form. Accessed online at <https://mht.maryland.gov/secure/Medusa/PDF/Baltimore%20City/B-3668.pdf>
- Maryland Historical Society. 2015. "Port Covington: Baltimore's Junction with the World." MDHS Underbelly Blog. Accessed September 28, 2016 at <http://www.mdhs.org/underbelly/2016/06/30/port-covington-baltimores-junction-with-the-world/>.
- Sidney, J.C. 1857. *Map of the City and County of Baltimore, Maryland*. James M. Stephens: Baltimore, MD.

United States Coast Survey. 1845. *Baltimore Harbor and City, Maryland*. Accessed on June 3, 2016 at <https://historicalcharts.noaa.gov/historicals/search>.

United States Geological Survey. 1959. Aerial Single Frame Photo ID: ARB593503503520. U.S. Geological Survey (USGS) Earth Resources Observation and Science (EROS) Center: Sioux Falls, South Dakota.

United States Geological Survey. 1970. Aerial Single Frame Photo ID: AR6144001200077. U.S. Geological Survey (USGS) Earth Resources Observation and Science (EROS) Center: Sioux Falls, South Dakota.

Walls, Gail Lyn. 2002. *Westport Historic District*, Maryland Historical Trust Determination of Eligibility form. Accessed online at <https://mht.maryland.gov/secure/Medusa/PDF/Baltimore%20City/B-1342.pdf>.



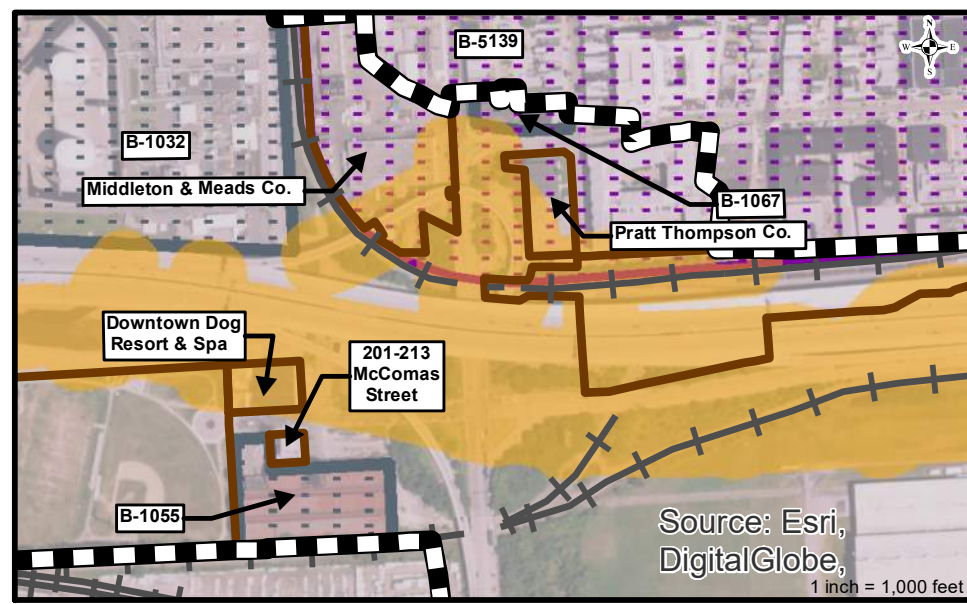
LEGEND

- Architectural
- Archeological
- 45+ Year Old Buildings
- 45+ Year Old Railroad Alignments

NRHP Eligibility of MIHP Resources

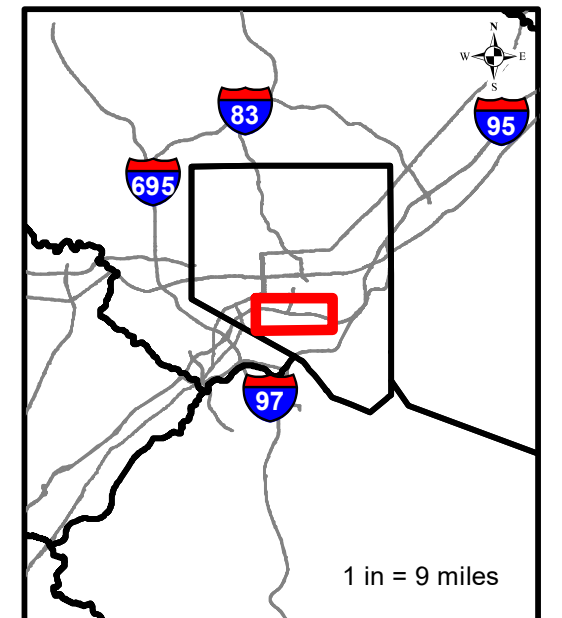
- NRHP Listed
- Eligible
- Unevaluated

0 500 1,000 2,000 Feet



MIHP Properties within Architectural APE

MIHP #	Resource Name	NRHP Eligibility Determination
B-1032	Baltimore Gas & Electric Spring Gardens Station	Unevaluated
B-1055	Lyon, Conklin and Company	Unevaluated
B-1067	Pabst Brewing Company (Maryland Glass and Mirror Company)	Unevaluated
B-1342	Westport Historic District	Eligible
B-3668	Spring Garden Bridge	Eligible
B-5139	Riverside Historic District	NRHP Listed

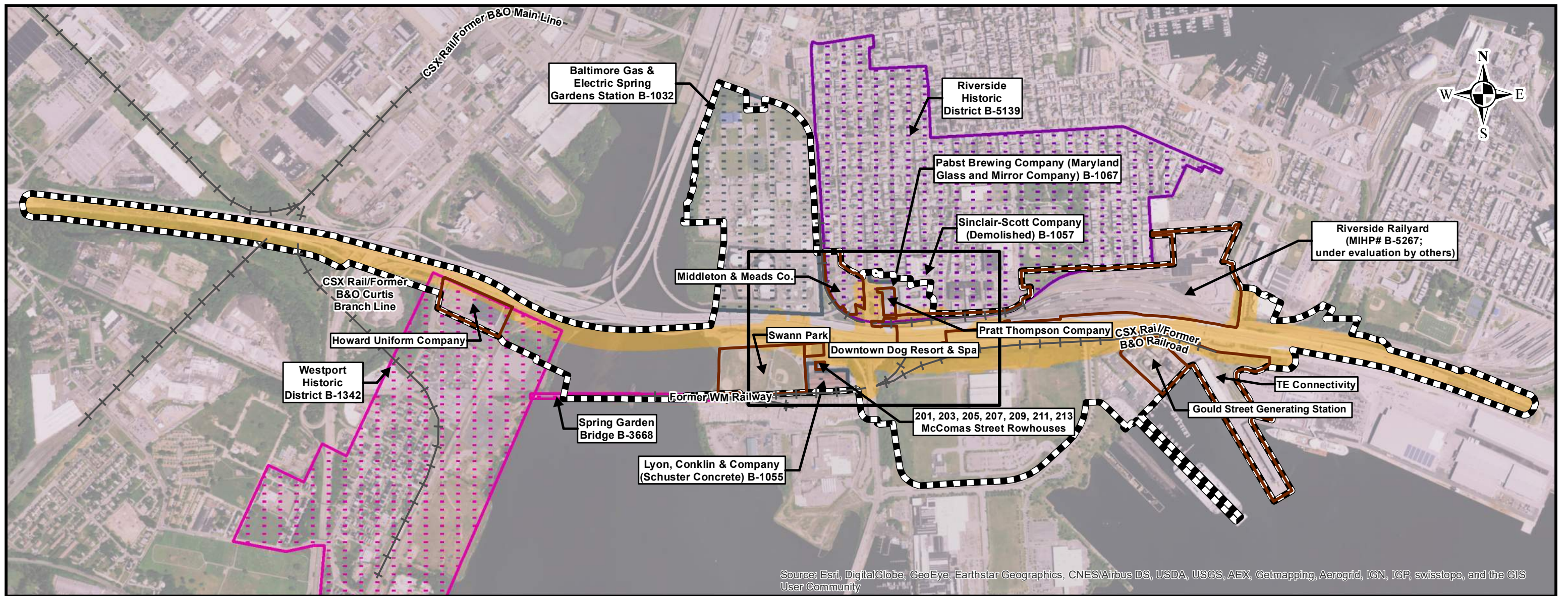


I-95 ACCESS IMPROVEMENTS FROM CATON AVENUE TO FORT MCHENRY TUNNEL

FIGURE 1: CULTURAL RESOURCES WITHIN THE APE OF ALTERNATIVE 2

Map Date - November 2016





Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

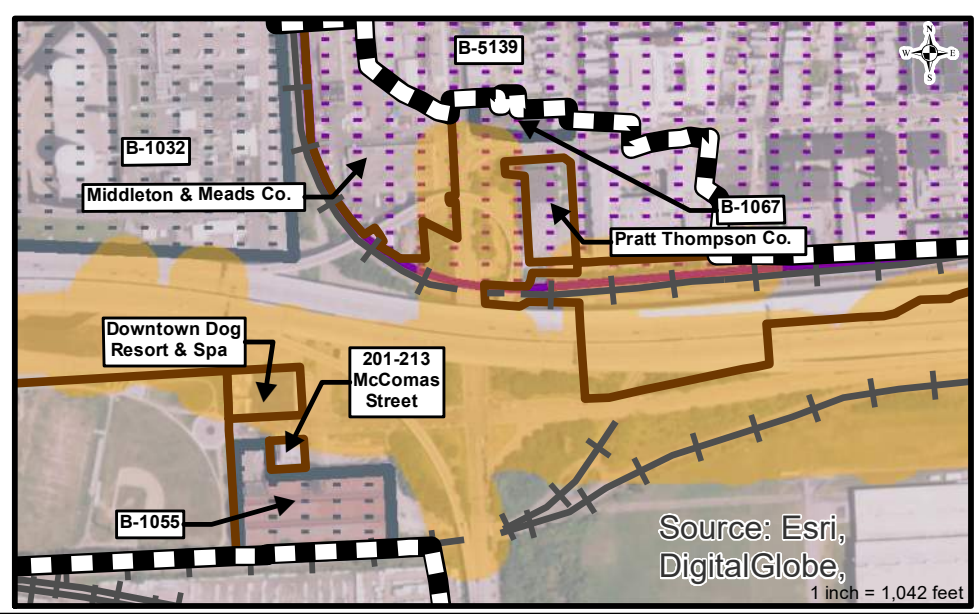
LEGEND

- ARCHITECTURAL_APE_Alt3
- Archeological
- 45+ Year Old Buildings
- 45+ Year Old Railroad

NRHP Eligibility of MIHP Resources

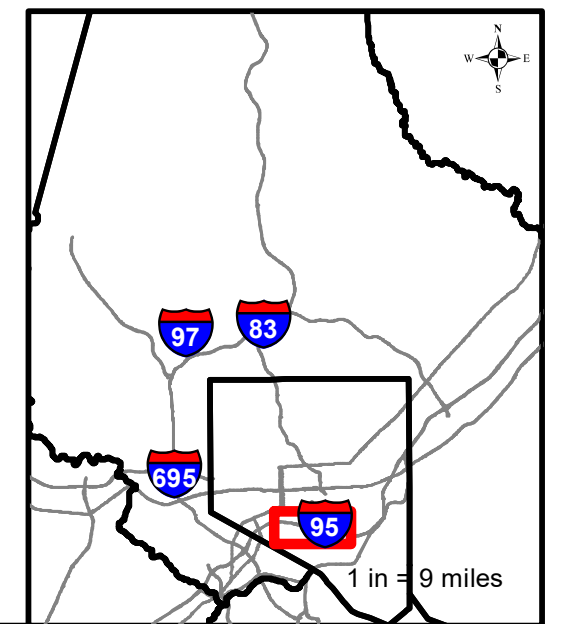
- NRHP Listed
- Eligible
- Unevaluated

0 500 1,000 2,000 Feet



MIHP Properties within Architectural APE

MIHP #	Resource Name	NRHP Eligibility Determination
B-1032	Baltimore Gas & Electric Spring Gardens Station	Unevaluated
B-1055	Lyon, Conklin and Company	Unevaluated
B-1067	Pabst Brewing Company (Maryland Glass and Mirror Company)	Unevaluated
B-1342	Westport Historic District	Eligible
B-3668	Spring Garden Bridge	Eligible
B-5139	Riverside Historic District	NRHP Listed

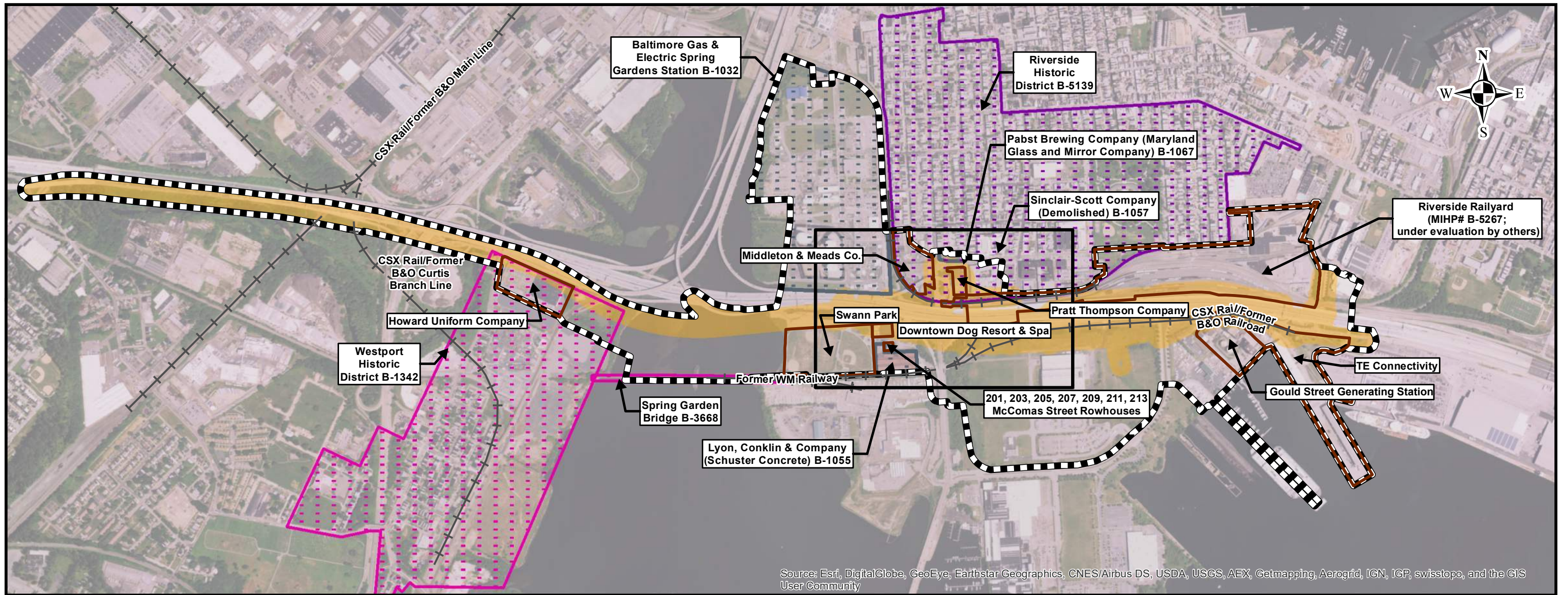


I-95 ACCESS IMPROVEMENTS FROM CATON AVENUE TO FORT MCHENRY TUNNEL

FIGURE 2: CULTURAL RESOURCES WITHIN THE APE OF ALTERNATIVE 3

Map Date - November 2016





Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

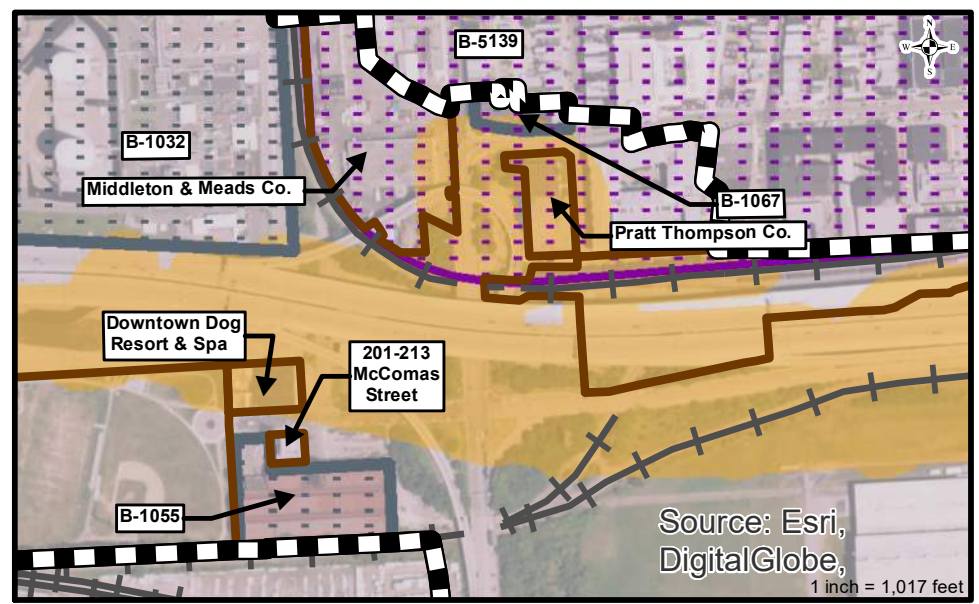
LEGEND

- Architectural
- Archeological
- 45+ Year Old Buildings
- 45+ Year Old Railroad Alignments

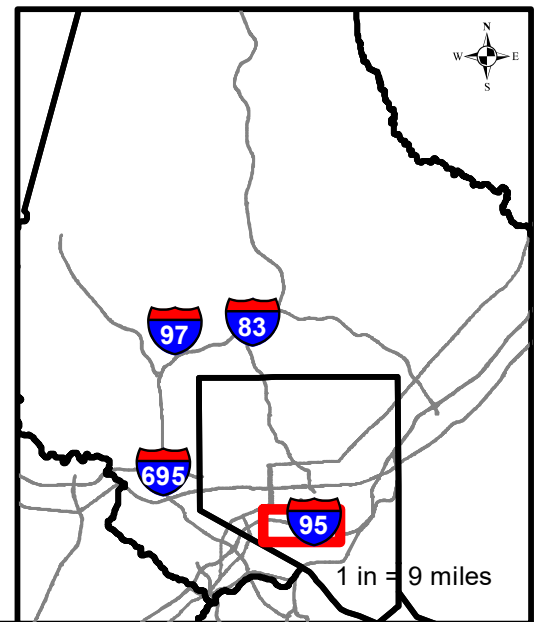
NRHP Eligibility of MIHP Resources

- NRHP Listed
- Eligible
- Unevaluated

0 500 1,000 2,000 Feet



MIHP Properties within Architectural APE		
MIHP #	Resource Name	NRHP Eligibility Determination
B-1032	Baltimore Gas & Electric Spring Gardens Station	Unevaluated
B-1055	Lyon, Conklin and Company	Unevaluated
B-1067	Pabst Brewing Company (Maryland Glass and Mirror Company)	Unevaluated
B-1342	Westport Historic District	Eligible
B-3668	Spring Garden Bridge	Eligible
B-5139	Riverside Historic District	NRHP Listed



I-95 ACCESS IMPROVEMENTS FROM CATON AVENUE TO FORT MCHENRY TUNNEL

FIGURE 3: CULTURAL RESOURCES WITHIN THE APE OF ALTERNATIVE 4

Map Date - November 2016



Appendix A



Maryland
Transportation
Authority

Larry Hogan
Governor

Boyd K. Rutherford
Lt. Governor

Pete K. Rahn
Chairman

Katherine Bays Armstrong
Peter J. Basso
William H. Cox, Jr.
William C. Ensor, III
W. Lee Gaines, Jr.
William K. Hellmann
Randall Nixon
John Von Paris

Milt Chaffee
Executive Director

2310 Broening Highway
Baltimore MD 21224
410-537-1000
410-537-1003 (fax)
711 (MD Relay)
1-866-713-1596

e-mail: mdta@mdta.maryland.gov

www.mdtta.maryland.gov

September 9, 2016

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
Division of Historic and Cultural Programs
100 Community Place
Crownsville, MD 21032-2023

ATTN: Beth Cole, Administrator
Review and Compliance

**RE: Section 106 Initiation of Consultation
I-95 Access Improvements, Caton Avenue to Fort McHenry Tunnel
Environmental Assessment
Baltimore City, Maryland**

Dear Ms. Hughes:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of federal funds from the Federal Highway Administration to prepare planning studies for a suite of improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities to support existing and planned development in the Port Covington area of Baltimore City, Maryland (**Figure 1**). The purpose of this letter is to initiate consultation pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), identify potential consulting parties, and delineate a proposed area of potential effects (APE) for your review and comment.

As shown in **Figure 1**, the study area generally follows the northern boundary of the Port Covington peninsula and includes the I-95 corridor. In addition, the improvements extend to several City streets (Hanover Street, McComas Street and Key Highway), pedestrian facilities, and the CSX Railroad tracks.

Project Alternatives

Four alternatives for transportation improvements have been developed for the project. Each alternative is composed of eight project elements with various options for improvements. Proposed improvements associated with the three Build alternatives (Alternatives 2, 3, and 4) would accommodate planned growth at Port Covington, a key growth cluster, while maintaining the functionality of the local and regional transportation system and enhancing multi-modal connections around and across I-95.

The eight project elements and options include:

Element A: I-95 Northbound Off Ramps

- Option 1: Maintain the Existing Hanover Street and McComas Street Ramps
- Option 2: Provide a Spur Ramp from Hanover Street Ramp to McComas Street
- Option 3: Relocate the Hanover Street Ramp – New Exit
- Option 4: Relocate the Hanover Street Ramp – A-B Exits
- Option 5: Complete the Hanover Street Interchange
- Option 6: Modify the McComas Street Off Ramp

Element B: I-95 Northbound On Ramp

- Option 1: Maintain the Existing Ramp
- Option 2: Construct an Additional On Ramp from Hanover Street
- Option 3: Construct a New Additional On Ramp

Element C: I-95 Southbound Off Ramp

- Option 1: Maintain the Existing Ramp
- Option 2: Improve the Existing Ramp
- Option 3: Provide a Two Lane Exit
- Option 4: Provide an Additional I-95 Southbound Off Ramp from the Existing Ramp
- Option 5: Provide an Additional I-95 Southbound Off Ramp from a New Location

Element D: I-95 Southbound On Ramps

- Option 1: Maintain the Existing Ramps
- Option 2: Widen the Existing Hanover Street Ramp
- Option 3: Provide Roundabout along Hanover Street
- Option 4: Reconstruct the Existing Ramp to Lengthen the Weave

Element E: Hanover Street

- Option 1: Maintain Existing Hanover Street Grade
- Option 2: Reconstruct Hanover Street

Element F: McComas Street

- Option 1: Maintain One Way McComas Street
- Option 2: Construct Two Way McComas Street

Element G: Pedestrians and Bicycles

- Option 1: Maintain Existing Pedestrian Connections
- Option 2: Construct Additional Pedestrian Connection to South Baltimore

Element H: CSX

- Option 1: Modify CSX Tracks South of McComas Street
- Option 2: Remove CSX Tracks South of McComas Street

Proposed Area of Potential Effects (APE)

Under Section 106, the proposed APE is defined in 36 CFR Part 800.16(d) as follows: “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The APE for archaeological resources comprises the geographic area in which the ground surface is physically impacted by the project, referred to as the project limits of disturbance (LOD). To account for possible project changes, the current archaeological APE has been defined as a 100-foot buffer surrounding the LOD.

The APE for architectural historic resources includes the area in which the project may directly or indirectly cause changes in the character or use of historic properties, if they exist. This includes the entire area comprising the archaeological APE. To account for potential visual, atmospheric, or audible effects, the APE for architectural historic resources also extends beyond the actual construction limits of the project to include those properties that may be affected by visual changes or patterns of use, or may experience a change in historic character associated with the proposed undertaking. Because project impacts are limited mainly to the existing elevated I-95 right-of-way, and because of the relatively dense development comprising the project corridor, possible visual, atmospheric, and audible impacts beyond the tax parcels immediately abutting the road right-of-way, are expected to be negligible. Generally, the architectural APE combines the LOD and all overlapping parcels, in order to take into account the full potential effects on an entire resource.

The recommended APEs do not include the entirety of the Sagamore Development Company’s proposed Port Covington Development. The development will take place regardless of the undertaking outlined here. The MDTA understands that potential impacts to historic resources located inside the boundaries of the Port Covington Development will be addressed as part of a separate investigation in conjunction with the proposed development. The recommended APEs for both architectural and archeological resources are delineated in **Figure 2**.

MDTA has also attached a list of identified consulting parties to participate in the Section 106 consultation process (**Attachment A**).

Next Steps

The MDTA requests your review and concurrence of the proposed APE delineations and list of recommended consulting parties. The MDTA would be happy to provide MHT with any additional information or justification for the enclosed and would be happy to consult directly with your office concerning the project. To aid in our studies, we also cordially request any information your office may have regarding historic properties.

Ms. Elizabeth Hughes
RE: Section 106 Initiation of Consultation
Maryland Transportation Authority and City of Baltimore
I-95 Access Improvements, Caton Avenue to Fort McHenry Tunnel
September 9, 2016
Page 4

We look forward to working with you as we develop this exciting project in support of the proposed development at Port Covington. If you have any questions concerning the project or the information presented, please contact me directly at 410-537-5650 or our cultural resources consultant, Sarah Michailof at Straughan Environmental, Inc. She can be reached at 443-539-2522 or smichailof@straughanenvironmental.com.

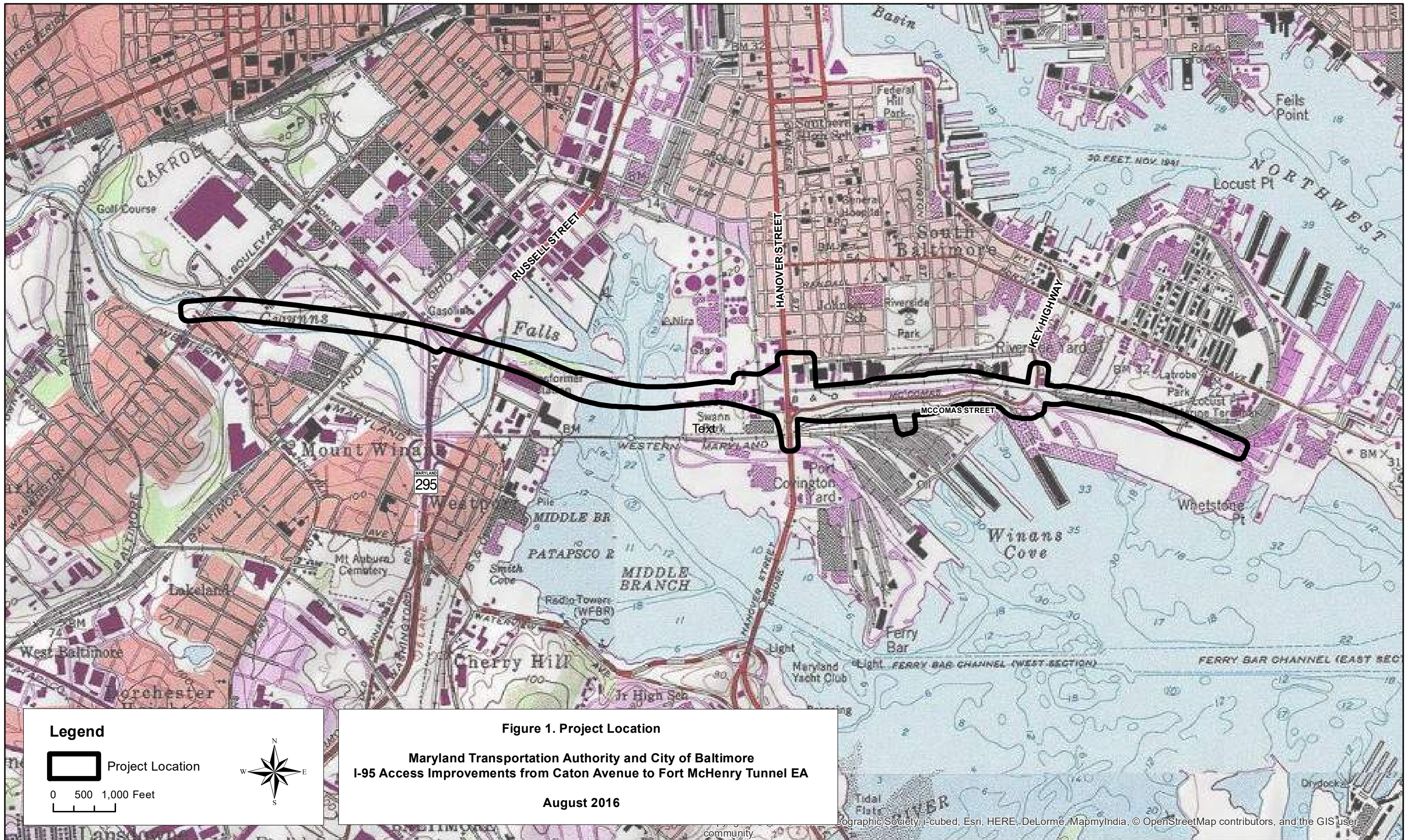
Sincerely,

A handwritten signature in blue ink, appearing to read "D. Simpson".


Dennis Simpson
Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosures and Attachments

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
Christina Alexiou-Hidalgo, NEPA Project Manager, STV, Inc.
Mark Cheskey, PB (on behalf of Baltimore City Department of Transportation)
Eric Almquist, RK&K (on behalf of MDTA)



Legend

 Project Location
 0 500 1,000 Feet

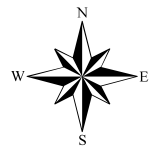
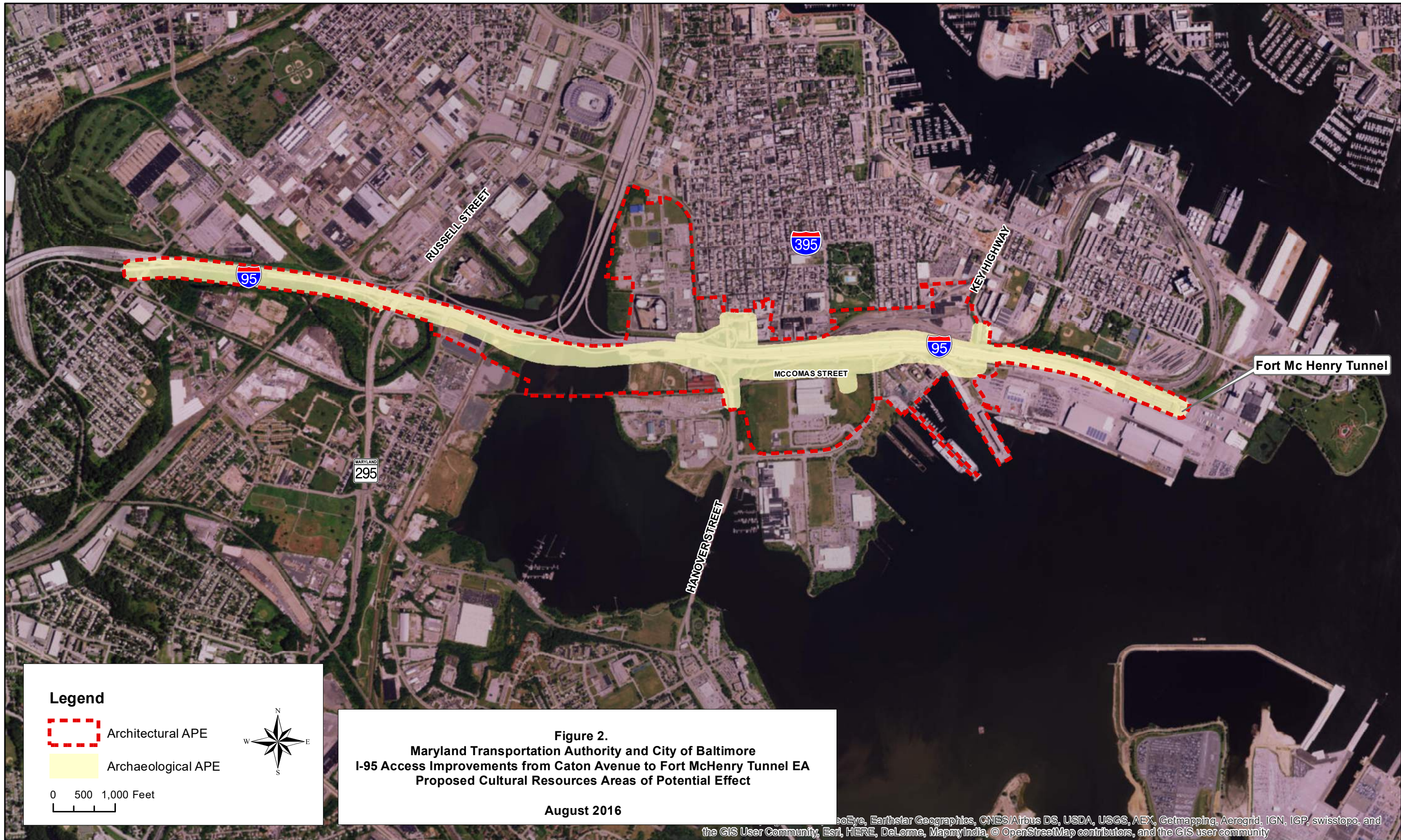


Figure 1. Project Location

**Maryland Transportation Authority and City of Baltimore
 I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel EA**

August 2016

Geographic Society, i-cubed, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community.



Map data provided by: Google Earth, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community

Attachment A

Section 106 Initiation and Consultation

I-95 Access Improvements, Caton Avenue to Fort McHenry Tunnel

Environmental Assessment

Baltimore City, Maryland

List of Proposed Section 106 Consulting Parties

Federal Agencies

US Army Corps of Engineers

Baltimore District

City Crescent Building

10 South Howard Street

Baltimore, MD 21201

ATTN: Joseph P. DaVia, Chief, Maryland Section Northern

(410) 962-5691

National Park Service

Fort McHenry National Monument and Historic Shrine

2400 East Fort Avenue

Baltimore, MD 21230

ATTN: Tina Cappetta, Superintendent

(410) 962-4290

Indian Tribes

Haudenosaunee Tribes

Jesse Bergevin, Historic Resources Specialist

2037 Dream Catcher Plaza

Oneida, NY 13421-0662

(315) 829-8463

(315) 829-8473 Fax

jbergevin@oneida-nation.org

Anthony Gonyea, Faithkeeper (Beaver Clan)

Onondaga Nation

RR #1, Box 245

Nedrow, NY 13120

(315) 952-3109

ononcomm@gmail.com

(requests hard copy)

Mr. Arnold Printup, THPO
Saint Regis Mohawk Tribe
412 State Route 37
Akwesasne, NY 13655
(518) 358-2272 ext. 164
(518) 358-3203 FAX
arnold.printup@srmt-nsn.gov

Paul Barton, THPO
Seneca Cayuga Tribe of Oklahoma
23701 South 655 Road
Grove, OK 74344
(918) 787-7979
pbarton@sctribe.com

Delaware Tribes

Ms. Susan Bachor
Delaware Tribe Historic Preservation Representative
P.O. Box 64
Pocono Lake, PA 18347
(610) 761-7452
temple@delawaretribe.org

Shawnee Tribes

Leonard Longhorn
Cultural Preservation Director/ THPO
Absentee-Shawnee Tribe of Oklahoma
2025 S. Gordon Cooper Dr
Shawnee, Oklahoma 74801
(405) 275-4030 ext. 203
(405) 878-4711 FAX
llonghorn@astribe.com

Ms. Robin Dushane, THPO
Cultural Preservation Director
Eastern Shawnee Tribe of Oklahoma
12705 South 705 Road
Wyandotte, OK 74370
(918) 666-2435 ext. 1845
(918) 533-4101 cell
(918) 533-4104 FAX
rdushane@estoo.net

Ms. Kim Jumper, THPO
Shawnee Tribe
P. O. Box 189
29 S Hwy 69A
Miami, OK 74355
(918) 542-2441
(918) 542-2922
kim.jumper@shawnee-tribe.com

Local Government and Local Preservation Groups

Baltimore City Commission for Historical & Architectural Preservation
417 East Fayette Street, 8th floor
Baltimore, MD 21202
ATTN: Eric Holcomb, Executive Director
eric.holcomb@baltimorecity.gov
(410) 396-4866

Baltimore City Department of Transportation
417 E. Fayette Street
5th Floor
Baltimore, MD 21202
(410) 396-6802
ATTN: Frank Murphy, Acting Director

Baltimore City Department of Planning
417 E. Fayette Street, 8th Floor
Baltimore, MD 21202
ATTN: Thomas J. Stosur, Director
deptofplanning@baltimorecity.gov
(410) 396-7526

Baltimore Heritage
11 1/2 West Chase Street
Baltimore, MD 21201
ATTN: Johns Hopkins, Executive Director
hopkins@baltimoreheritage.org
(410) 332-9992

Western Maryland Railway Historical Society
99 Shenandoah View Drive
Harpers Ferry WV 25425
ATTN: Kenneth (Ken) G. Mazer, President/Chairman of the Board
ken.wmrhs@comcast.net

E. Keith Colston, Administrative Director
Maryland Commission on Indian Affairs
301 West Preston Street
Suite 1500
Baltimore, MD 21201
keith.colston@maryland.gov
(410) 767-7631



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Wendi W. Peters, Secretary
Ewing McDowell, Deputy Secretary

November 9, 2016

Dennis Simpson
Director, Division of Project Planning & Program Development
Maryland Transportation Authority
2310 Broening Highway
Baltimore, MD 21224

Re: I-95 Access Improvements, Caton Avenue to Fort McHenry Tunnel
Initiation of Section 106 Consultation
Baltimore City, Maryland

Dear Mr. Simpson:

Thank you for your recent letter regarding the above-referenced project. Your submittal formally initiated consultation with the Trust, Maryland's State Historic Preservation Office, pursuant to Section 106 of the National Historic Preservation Act, for this federally assisted undertaking. Based on our review of the submitted materials, we offer the following comments and concurrence.

The Maryland Transportation Authority (MDTA) is proposing a suite of improvements to Interstate 95, ramps, connecting roads and other transportation facilities to support development in the Port Covington area of Baltimore City. The project study area generally includes the northern boundary of the Port Covington peninsula along the I-95 corridor between Washington Boulevard and the Fort McHenry Tunnel.

Based on the four existing alternatives developed for the undertaking, MDTA has delineated an Area of Potential Effects (APE) for historic architectural and archeological resources. The Trust agrees with the defined APE as described in your letter and illustrated in Figure 2 of your submittal. We recognize that MDTA may make further refinements to its APEs as planning proceeds based on alignment changes, the addition of ancillary actions, or other modifications.

MDTA also requested the Trust's assistance identifying potential consulting parties for this undertaking. We agree that Attachment A to MDTA's letter identifies appropriate consulting parties. We also suggest that MDTA include the Baltimore National Heritage Area and Preservation Maryland as consulting parties. As the Section 106 coordination and public outreach efforts progress, additional relevant parties may be identified and invited to participate in the consultation.

We look forward to ongoing consultation with MDTA and other involved parties to successfully complete the Section 106 consultation for this undertaking as project planning proceeds. If you have questions or need further assistance, please contact me (for historic structures) at tim.tamburrino@maryland.gov / 410-514-7637 or Beth Cole (for archeology) at beth.cole@maryland.gov / 410-514-7631. Thank you for providing us this opportunity to comment.

Sincerely,

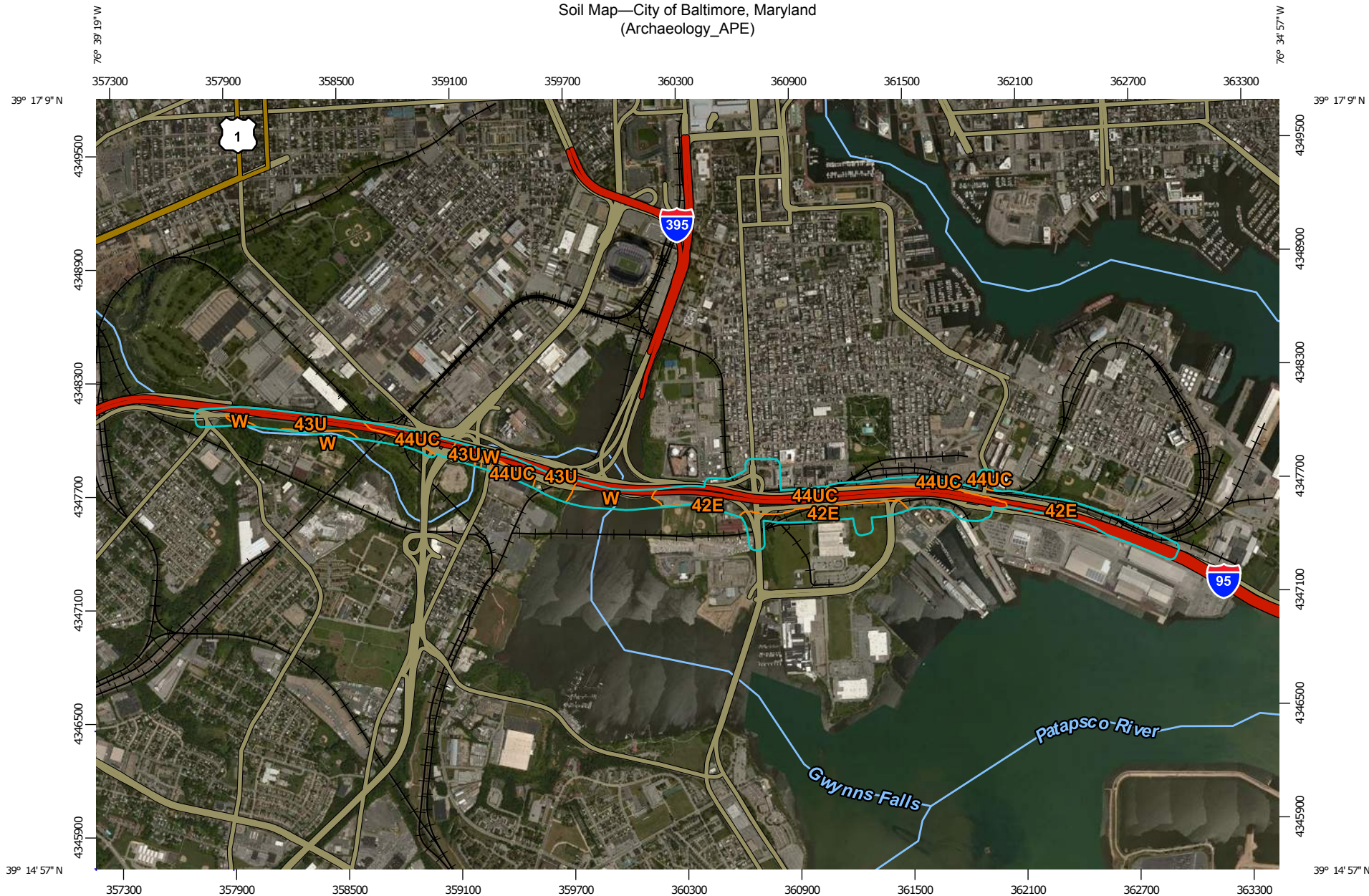
Tim Tamburrino
Preservation Officer, Project Review and Compliance
TJT/201604309

Appendix B

Table 1. Soil Types Located in the APE (USDA Baltimore City 1998; Web Soil Survey 2015)

Soil Type	Description
Udorthents, smoothed (42E), 0 to 35 percent slopes	This unit is made up of earthen fill and nonsoil material that has been placed on a poorly drained to somewhat excessively drained soils on uplands, terraces, and flood plains of the Coastal Plain and Piedmont Plateau. It is on sites of buildings, roads, railroads, recreation areas, and other uses. Slopes range from nearly level to steep, but are dominantly nearly level to moderately sloping. The thickness of the fill is more than 20 inches. Permeability and available water capacity are variable. Not prime farmland.
Urban land-Udorthents complex, occasionally flooded (43U)	This complex consists of nearly level areas of Urban land built up on and adjacent to recent alluvium deposited by fast-moving streams. This complex is on flood plains of major streams throughout the survey area. About 60% is Urban land, 30% is Udorthents, and 10% are small areas of Fluvents positioned in stream channels. Permeability and available water capacity are variable. Where unprotected, this complex is subject to flooding. Where protected from flooding, the open area of this complex have moderate potential for use as building sites and recreation areas. Not prime farmland.
Urban land (44UC), 0 to 15 percent slopes	This map unit consists of nearly level to moderately sloping areas of Urban land. Urban land consists of areas where more than 80% of the surface is covered by asphalt, concrete, buildings, or other impervious surfaces. Is located on all landscape positions of the Coastal Plain and the Piedmont Plateau. These sites are nearly level to moderately sloping.

Soil Map—City of Baltimore, Maryland
(Archaeology_APE)



Map Scale: 1:28,700 if printed on A landscape (11" x 8.5") sheet.



Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 18N WGS84





MAP LEGEND

Area of Interest (AOI)

Area of Interest (AOI)




















Soils







 Soil Map Unit Polygons

 Soil Map Unit Lines


 Soil Map Unit Points

Special Point Features






-  Blowout
-  Borrow Pit
-  Clay Spot
-  Closed Depression
-  Gravel Pit
-  Gravelly Spot
-  Landfill
-  Lava Flow
-  Marsh or swamp
-  Mine or Quarry
-  Miscellaneous Water
-  Perennial Water
-  Rock Outcrop
-  Saline Spot
-  Sandy Spot
-  Severely Eroded Spot
-  Sinkhole
-  Slide or Slip
-  Sodic Spot

-  Spoil Area
-  Stony Spot
-  Very Stony Spot
-  Wet Spot
-  Other
-  Special Line Features


Water Features

 Streams and Canals

Transportation

-  Rails
-  Interstate Highways
-  US Routes
-  Major Roads
-  Local Roads

Background

 Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:12,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov>
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: City of Baltimore, Maryland
Survey Area Data: Version 11, Sep 21, 2015

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Nov 5, 2011—Oct 25, 2014

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

City of Baltimore, Maryland (MD510)			
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
42E	Udorthents, smoothed, 0 to 35 percent slopes	51.3	29.2%
43U	Urban land-Udorthents complex, occasionally flooded	37.1	21.1%
44UC	Urban land, 0 to 15 percent slopes	71.0	40.5%
W	Water	16.1	9.2%
Totals for Area of Interest		175.4	100.0%

Appendix C

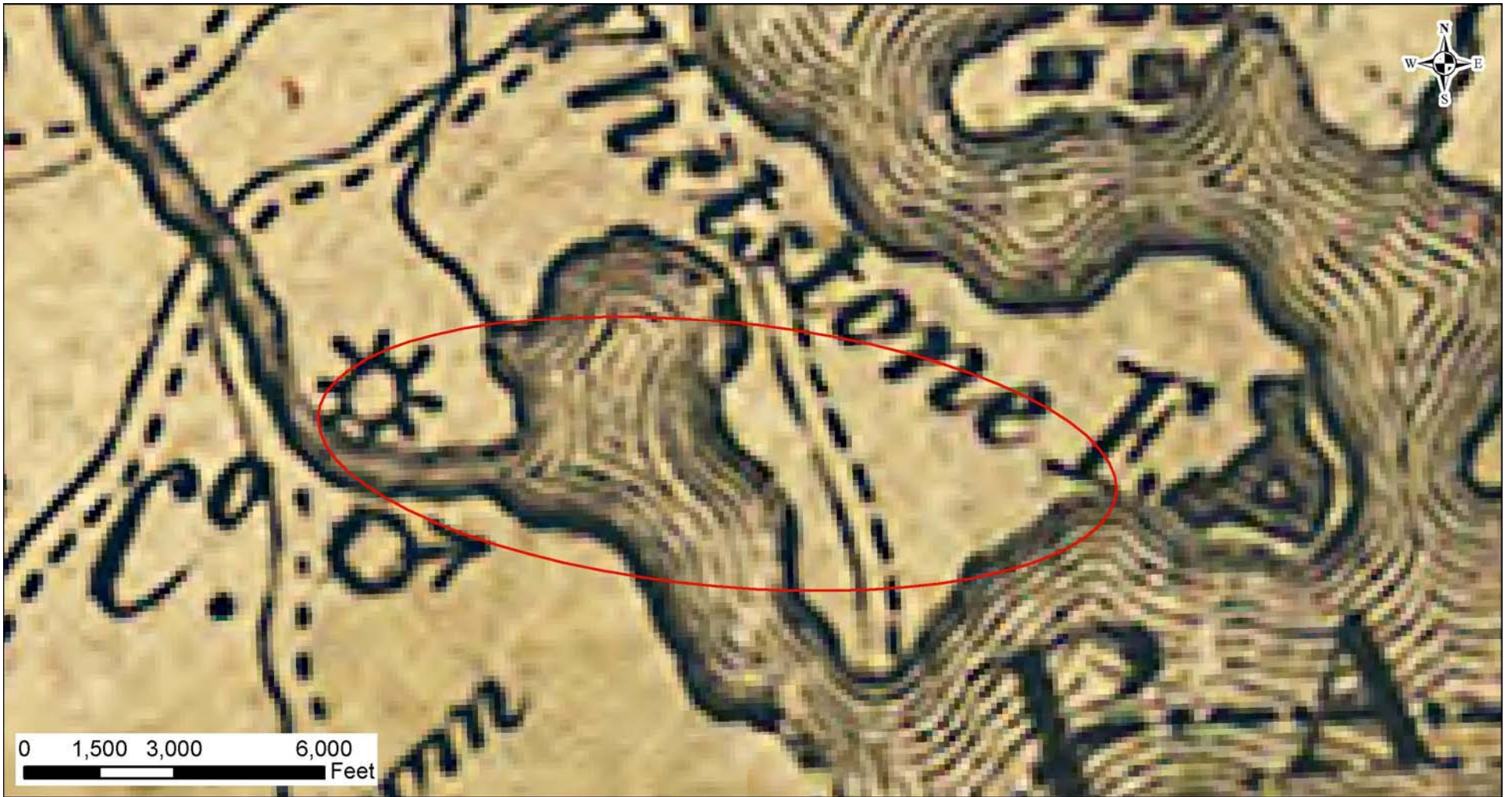


Figure C-1. Project Area in 1795, Dennis Griffith's Map of the State of Maryland. Scale is approximate.

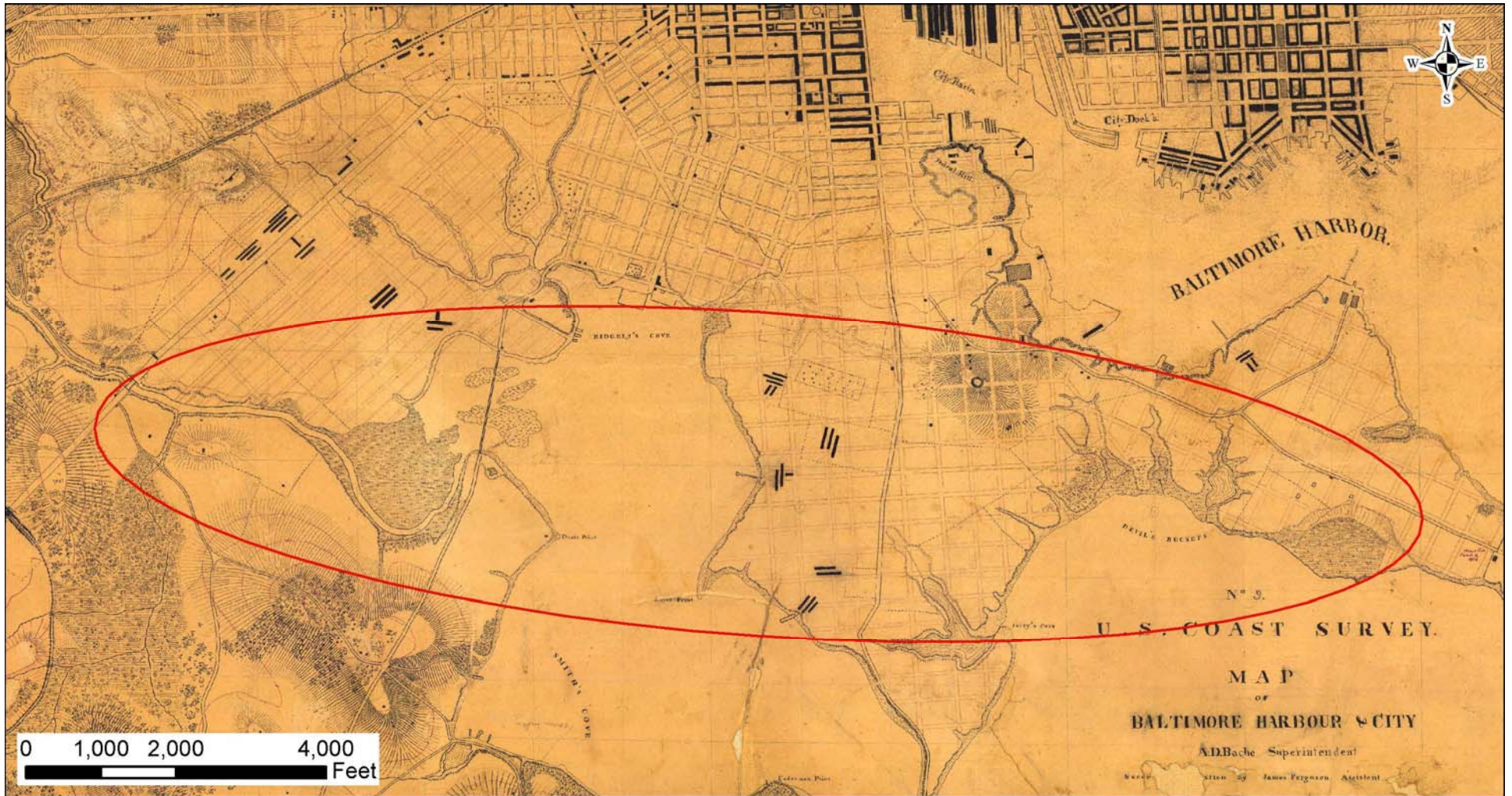


Figure C-2. Project Area in 1845, U.S. Coast Survey, Baltimore Harbor and City, Maryland. Scale is approximate.

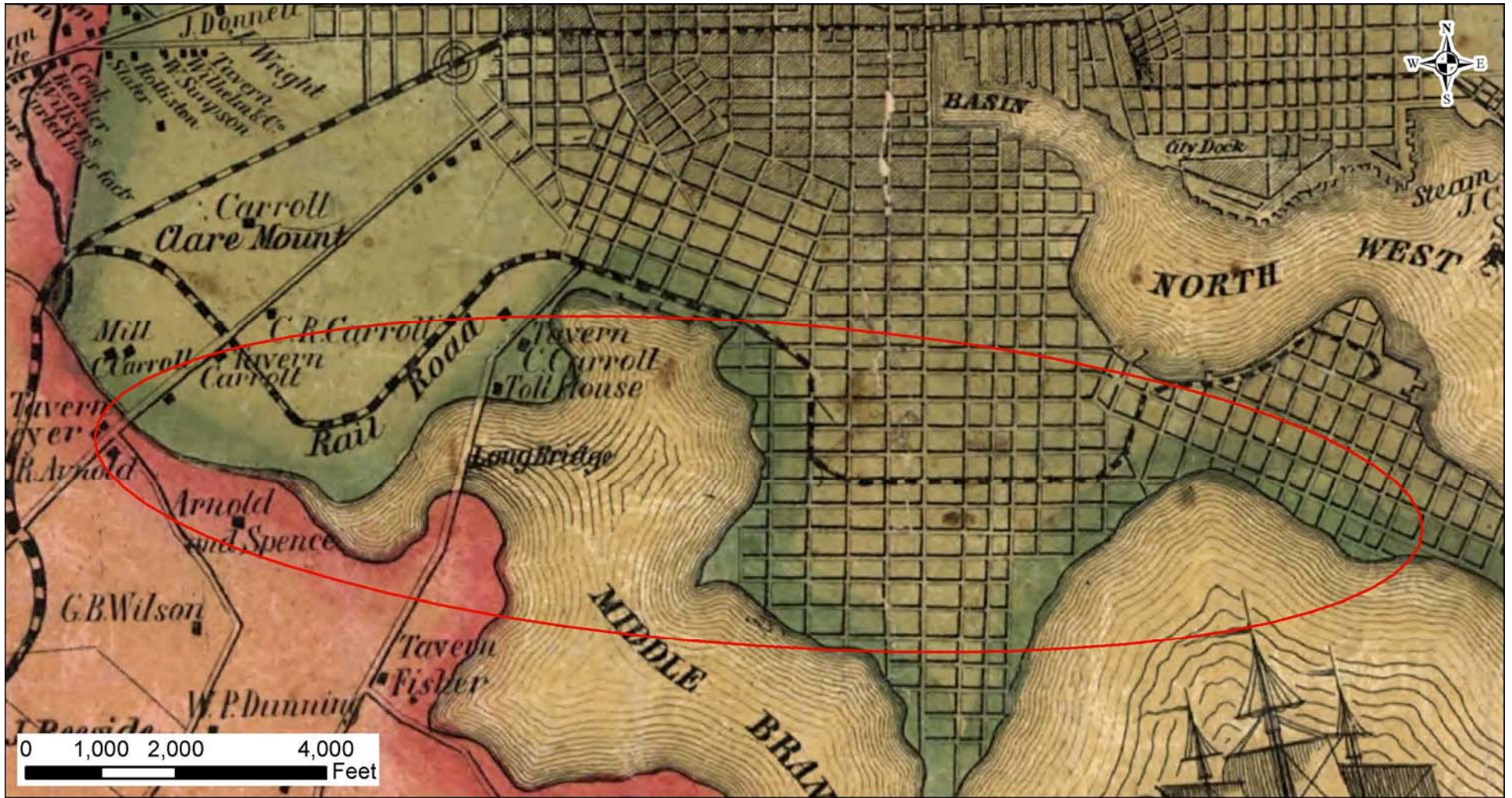


Figure C-3. Project Area in 1857 on J. C. Sydney's Map of the City and County of Baltimore, Maryland. Scale is approximate.



Figure C-4. Project Area in 1878 on G.M. Hopkins's Atlas of Fifteen Miles Around Baltimore Including Anne Arundel County, Maryland. Scale is approximate.

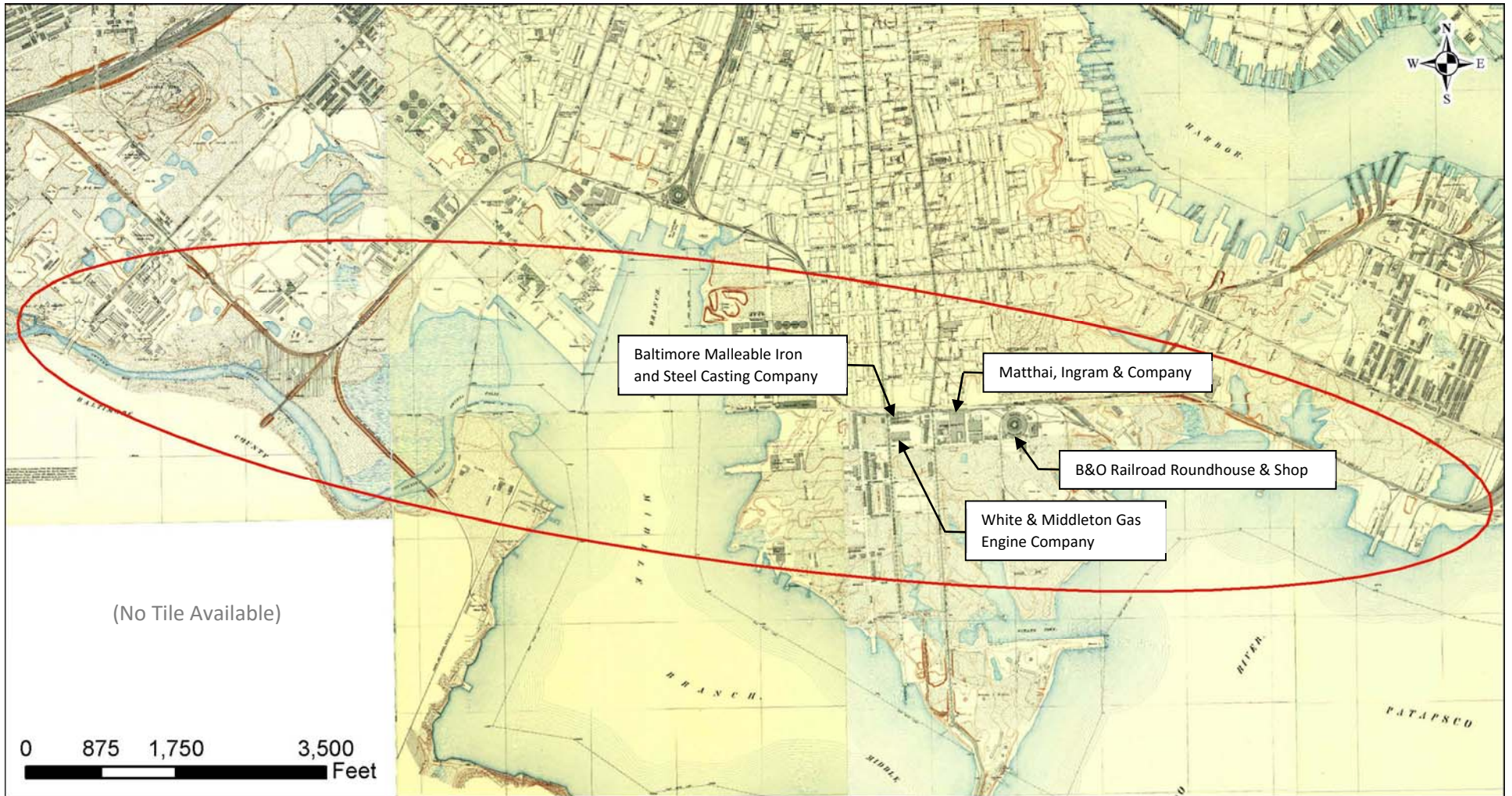


Figure C-5. Project Area in 1897, Duncan, Frank K., et al., *Atlas of the City of Baltimore, MD*. Scale is approximated.



Figure C-6. Project Area in 1927, Chesapeake Aircraft Company Aerial Photography.

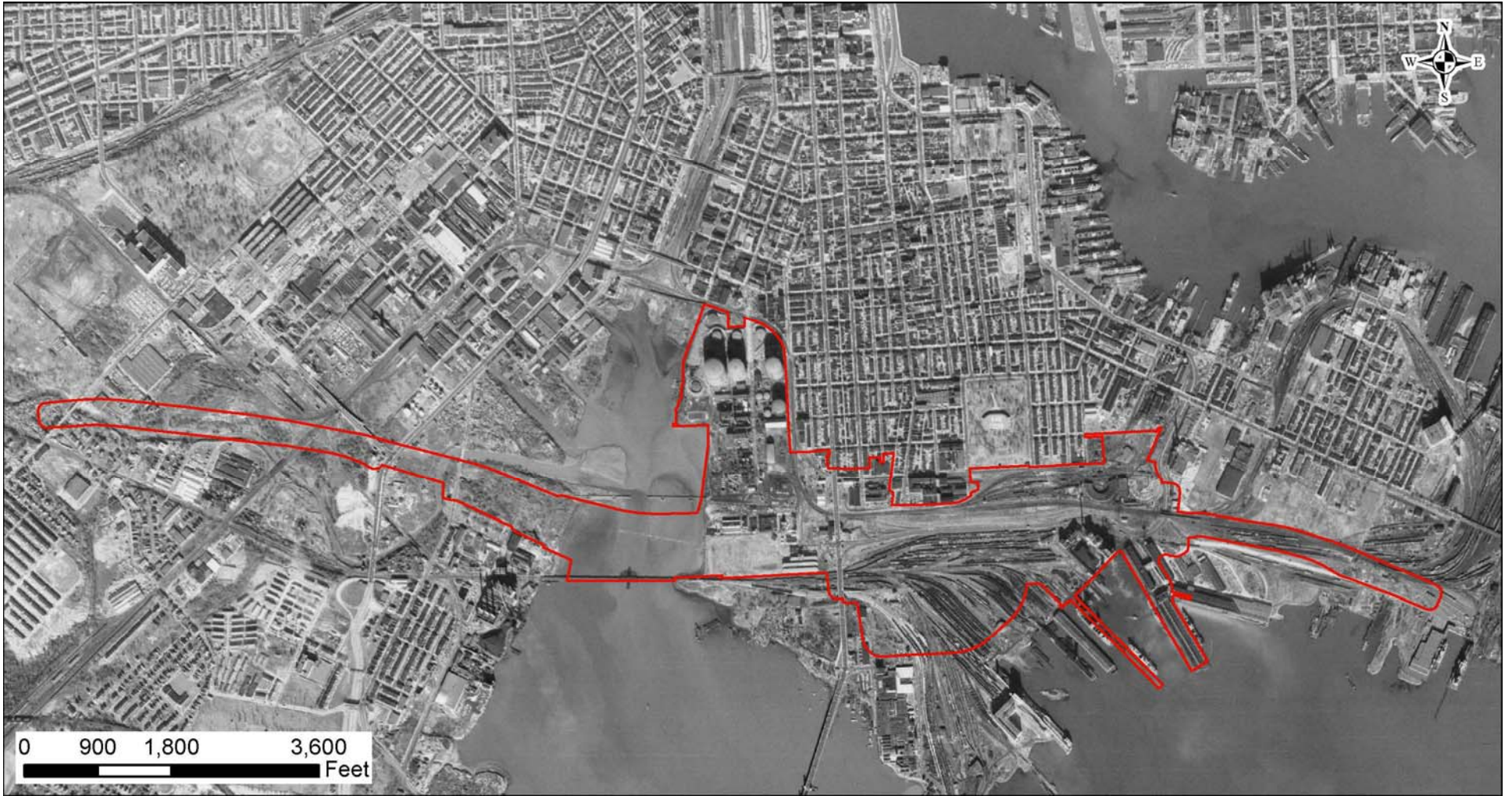


Figure C-7. Project Area in 1959 accessed from U.S. Geological Survey Earth Explorer.



Figure C-8. Project Area in 1970 accessed from U.S. Geological Survey Earth Explorer.



Figure C-9. Project Area in 1994, Google Earth, Historical Imagery.

Appendix D



Figure D-1. View west along abandoned segment of Gwynns Falls Trail, showing evidence of extensive flooding.



Figure D-2. View northeast towards I-95, on abandoned segment of Gwynns Falls Trail, east of Washington Boulevard showing steep slope.

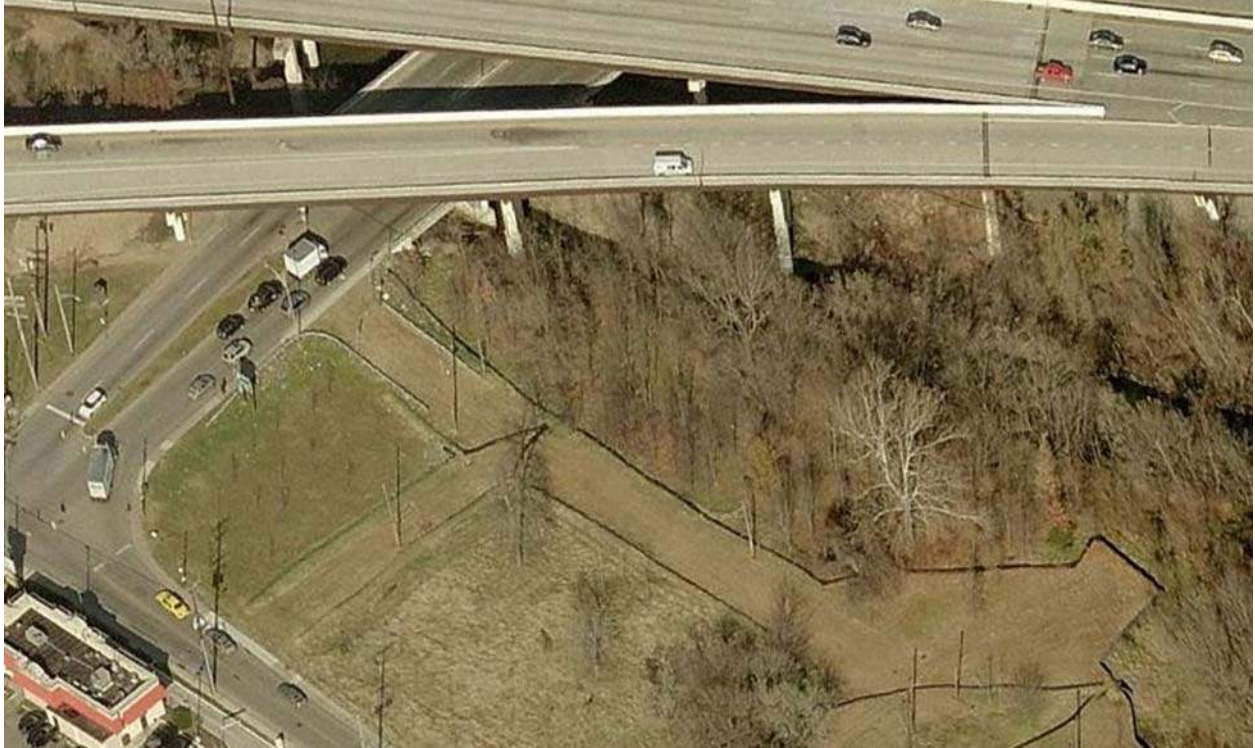


Figure D-3. Birds Eye View of Maisel Street Park, appears to show recent work to remove pavement or other structures associated with previous development of the parcel. (Bing Maps, 2016).



Figure D-4. View west between I-95 and South Monroe Street from Howard Uniform Company Parking Lot (1915 Annapolis Road).



Figure D-5. View east from north side of Howard Uniform Company Building below east side of I-95.



Figure D-6. View west towards north/east side of Howard Uniform Company Building, below east side of I-95 .



Figure D-7. View north of city-owned parcel on the north side of Westport. The parcel is east of the MTA light rail line, south of I-95, and west of the Middle Branch.



Figure D-8. View east of city-owned parcel on the north side of Westport. Piles of dirt visible.



Figure D-9. View west towards vegetation covered mounds with light rail catenary poles in the background. The mounds provide evidence of grading within APE on city-owned parcel north of Westport.



Figure D-10. View east towards the Middle Branch from the east side of the MTA light rail line



Figure D-11. View south of MTA utility building within architectural APE.



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Wendi W. Peters, Secretary
Ewing McDowell, Deputy Secretary

January 13, 2017

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority
2310 Broening Highway
Baltimore, MD 21224

Re: I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Baltimore City, Maryland

Dear Ms. Williams:

Thank you for your recent letter regarding the above-referenced project. Your submittal represents ongoing consultation with the Trust, Maryland's State Historic Preservation Office, pursuant to Section 106 of the National Historic Preservation Act, for this federally assisted undertaking. Based on our review of the submitted materials, we offer the following comments.

The Maryland Transportation Authority (MDTA) is proposing a suite of improvements to Interstate 95, ramps, connecting roads and other transportation facilities to support development in the Port Covington area of Baltimore City. The project study area generally includes the northern boundary of the Port Covington peninsula along the I-95 corridor between Washington Boulevard and the Fort McHenry Tunnel.

MDTA has conducted a reconnaissance of the historic built environment and assessed the archeological potential within the Area of Potential Effects (APEs) for this undertaking. We concur with the overall approach for conducting and completing the cultural resources investigations, as outlined in your submittal. We encourage frequent coordination with our office to ensure that the investigations are commensurate with the scale of the undertaking and consistent with our standards and guidelines. Please feel free to consult with the Trust prior to the initiation of any detailed investigations to ensure a reasonable and appropriate level of effort is performed for the project. We look forward to receiving the results of the architectural resources survey for review and comment, when available.

For the proposed terrestrial and underwater archeological investigations, the Trust will need to see scopes of work that provide detailed descriptions of the proposed methodologies for the research and field investigations, accompanying maps of the survey areas, and justification for the proposed levels of effort. As noted in the submittal, there has been considerable disturbance throughout the archeological APE as a result of various land alterations. The scopes of work should clearly identify the potential for National Register eligible archeological resources within the APE and justify why field investigations are warranted. The initiation of any underwater investigations must be closely coordinated with the Trust in advance of implementation. We await further consultation with MDTA and its consultant prior to the initiation of any detailed archeological investigations to ensure a reasonable and appropriate level of effort is performed for the project.

Melissa Williams
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
January 13, 2017
Page 2 of 2

We look forward to ongoing consultation with MDTA and other involved parties to successfully complete the Section 106 consultation for this undertaking as project planning proceeds. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov / 410-514-7637 or me (for archeology) at beth.cole@maryland.gov / 410-514-7631. Thank you for providing us this opportunity to comment.

Sincerely,



Beth Cole
Administrator, Project Review and Compliance

BC/TJT/201605930



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www.mdtta.maryland.gov

December 22, 2016

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
Division of Historic and Cultural Programs
100 Community Place
Crownsville, MD 21032-2023

ATTN: Beth Cole, Administrator, Review and Compliance

VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Ms. Hughes:

As you know, the Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts on historic properties. Pursuant to Section 106, the MDTA is pleased to provide you with the accompanying technical memorandum for your formal review and comment. Duplicate copies have been mailed to the consulting parties identified in the Initiation of Consultation letter dated September 9, 2016, and to the Baltimore National Heritage Area and Preservation Maryland, as suggested by your office on November 9, 2016.

The MDTA respectfully requests your expedited review of the enclosed. If you have any comments or questions concerning the project or the information presented, please contact me directly at 410-537-5651 or our cultural resources consultant, Sarah Michailof at Straughan Environmental, Inc. She can be reached at 443-539-2522 or smichailof@straughanenvironmental.com.

Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
Christina Alexiou-Hidalgo, NEPA Project Manager, STV, Inc.
Erron Ramsey, RK&K (on behalf of MDTA)



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www.mdtta.maryland.gov

December 22, 2016

US Army Corps of Engineers
Baltimore District
City Crescent Building
10 South Howard Street
Baltimore, MD 2120

ATTN: Joseph P. DaVia, Chief, Maryland Section Northern
VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Mr. DaVia:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts to historic properties. Section 106 also gives an enhanced opportunity to individuals and organizations to participate as consulting parties. The purpose of this letter is to formally invite your organization to join as a consulting party and to provide you with the accompanying technical memorandum for your review and comment.

If you have any comments or questions concerning the project or the information presented, or if you would like to request a paper copy, please contact me directly at 410-537-5651 or our cultural resources consultant, Sarah Michailof at Straughan Environmental, Inc. by January 13, 2017. She can be reached at 443-539-2522 or smichailof@straughanenvironmental.com.

Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
Christina Alexiou-Hidalgo, NEPA Project Manager, STV, Inc.
Erron Ramsey, RK&K (on behalf of MDTA)



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www.mdtta.maryland.gov

December 22, 2016

Frank Murphy, Acting Director
Baltimore City Department of Transportation
417 E. Fayette Street
5th Floor
Baltimore, MD 21202

VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Mr. Murphy:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts to historic properties. Section 106 also gives an enhanced opportunity to individuals and organizations to participate as consulting parties. The purpose of this letter is to formally invite your organization to join as a consulting party and to provide you with the accompanying technical memorandum for your review and comment.

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Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
Christina Alexiou-Hidalgo, NEPA Project Manager, STV, Inc.
Erron Ramsey, RK&K (on behalf of MDTA)



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December 22, 2016

Thomas J. Stosur, Director
Baltimore City Department of Planning
417 E. Fayette Street, 8th Floor
Baltimore, MD 21202

VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Mr. Stosur:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts to historic properties. Section 106 also gives an enhanced opportunity to individuals and organizations to participate as consulting parties. The purpose of this letter is to formally invite your organization to join as a consulting party and to provide you with the accompanying technical memorandum for your review and comment.

If you have any comments or questions concerning the project or the information presented, or if you would like to request a paper copy, please contact me directly at 410-537-5651 or our cultural resources consultant, Sarah Michailof at Straughan Environmental, Inc. by January 13, 2017. She can be reached at 443-539-2522 or smichailof@straughanenvironmental.com.

Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
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Erron Ramsey, RK&K (on behalf of MDTA)



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December 22, 2016

Johns Hopkins, Executive Director
Baltimore Heritage
11 ½ West Chase Street
Baltimore, MD 21201

VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Mr. Hopkins:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts to historic properties. Section 106 also gives an enhanced opportunity to individuals and organizations to participate as consulting parties. The purpose of this letter is to formally invite your organization to join as a consulting party and to provide you with the accompanying technical memorandum for your review and comment.

If you have any comments or questions concerning the project or the information presented, or if you would like to request a paper copy, please contact me directly at 410-537-5651 or our cultural resources consultant, Sarah Michailof at Straughan Environmental, Inc. by January 13, 2017. She can be reached at 443-539-2522 or smichailof@straughanenvironmental.com.

Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
Christina Alexiou-Hidalgo, NEPA Project Manager, STV, Inc.
Erron Ramsey, RK&K (on behalf of MDTA)



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December 22, 2016

Mr. Jason Vaughan, MHP
Director, Historic Preservation and Interpretation
Baltimore Heritage Area Association, Inc.
12 W. Madison Street, Suite 120
Baltimore, MD 21202

VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Mr. Vaughan:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts to historic properties. Section 106 also gives an enhanced opportunity to individuals and organizations to participate as consulting parties. The purpose of this letter is to formally invite your organization to join as a consulting party and to provide you with the accompanying technical memorandum for your review and comment.

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Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
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Erron Ramsey, RK&K (on behalf of MDTA)



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December 22, 2016

Eric Holcomb, Executive Director
Baltimore City Commission for Historical & Architectural Preservation
417 East Fayette Street, 8th floor
Baltimore, MD 21202

VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Mr. Holcomb:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts to historic properties. Section 106 also gives an enhanced opportunity to individuals and organizations to participate as consulting parties. The purpose of this letter is to formally invite your organization to join as a consulting party and to provide you with the accompanying technical memorandum for your review and comment.

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Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
Christina Alexiou-Hidalgo, NEPA Project Manager, STV, Inc.
Erron Ramsey, RK&K (on behalf of MDTA)



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December 22, 2016

E. Keith Colston, Administrative Director
Maryland Commission on Indian Affairs
301 West Preston Street
Suite 1500
Baltimore, MD 21201

VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Mr. Colston:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts to historic properties. Section 106 also gives an enhanced opportunity to individuals and organizations to participate as consulting parties. The purpose of this letter is to formally invite your organization to join as a consulting party and to provide you with the accompanying technical memorandum for your review and comment.

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Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
Christina Alexiou-Hidalgo, NEPA Project Manager, STV, Inc.
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www.mdtta.maryland.gov

December 22, 2016

National Park Service
Fort McHenry National Monument and Historic Shrine
2400 East Fort Avenue
Baltimore, MD 21230

ATTN: Tina Cappetta, Superintendent

VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Ms. Cappetta:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts to historic properties. Section 106 also gives an enhanced opportunity to individuals and organizations to participate as consulting parties. The purpose of this letter is to formally invite your organization to join as a consulting party and to provide you with the accompanying technical memorandum for your review and comment.

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Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
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Erron Ramsey, RK&K (on behalf of MDTA)



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www.mdtta.maryland.gov

December 22, 2016

Ms. Margaret De Arcangelis, Preservation Services Director
Preservation Maryland
3600 Clipper Mill Road, Suite 248
Baltimore, MD 21211

VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Ms. De Arcangelis:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts to historic properties. Section 106 also gives an enhanced opportunity to individuals and organizations to participate as consulting parties. The purpose of this letter is to formally invite your organization to join as a consulting party and to provide you with the accompanying technical memorandum for your review and comment.

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Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

cc: Jeanette Mar, FHWA
Sarah Michailof, Cultural Resource Specialist, Straughan Environmental, Inc.
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Erron Ramsey, RK&K (on behalf of MDTA)



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December 22, 2016

Kenneth G. Mazer, President/Chairman of the Board
Western Maryland Railway Historical Society
99 Shenandoah View Drive
Harpers Ferry WV 25425

VIA E-MAIL

**RE: Section 106 Consultation
Assessment of Potential for Cultural Resources
I-95 Access Improvements from Caton Avenue to Fort McHenry Tunnel
Environmental Assessment, Baltimore City, Maryland**

Dear Mr. Mazer:

The Maryland Transportation Authority (MDTA), in partnership with the City of Baltimore (City), anticipates the use of Federal Highway Administration grant funds to prepare planning studies for proposed improvements to Interstate 95 (I-95) ramps, connecting roads, and other transportation facilities in the Port Covington area of Baltimore City, Maryland. The use of federal funds triggers Section 106 of the National Historic Preservation Act of 1966, as amended and its implementing regulations (36 CFR § 800), which requires consideration of a project's impacts to historic properties. Section 106 also gives an enhanced opportunity to individuals and organizations to participate as consulting parties. The purpose of this letter is to formally invite your organization to join as a consulting party and to provide you with the accompanying technical memorandum for your review and comment.

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Sincerely,

Melissa Williams
Acting Director, Division of Project Planning & Program Development
Maryland Transportation Authority

Enclosure: Assessment of Potential for Cultural Resources (December 2015)

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