

4 ENVIRONMENTAL CONSEQUENCES AND MITIGATION

This chapter contains a discussion of the environmental consequences, or impacts, associated with the No-Action Alternative and with site selection and construction of the relocation of the Metro West facility on the Wabash Avenue and Liberty Village Sites.

Impact Assessment

This section includes an analysis of direct, indirect, and cumulative impacts. Direct impacts are caused by the action and occur at the same time and place. Indirect impacts are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Cumulative impacts are the impacts on the environment, which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. (40 CFR 1508.7 – 1508.8)

This section also includes information on measures to mitigate the impacts at the end of each impact topic.

4.1 NATURAL AND PHYSICAL ENVIRONMENT

4.1.1 WATER RESOURCES

Maryland Department of the Environment (MDE) implements the Maryland erosion and sediment control (ESC) program according to the Maryland Erosion and Sediment Control Law. This law is found in the Code of Maryland Regulations (COMAR 26.17.01). Since the proposed action would result in a land disturbance exceeding 5,000 square feet, it would need to abide by the MDE ESC program. This program's goal is to control soil erosion, sedimentation, and runoff from land disturbance. The MDE publication, *1994 Maryland Standards for Soil Erosion and Sediment Control*, contains design and construction specifications.

4.1.1.1 Alternative 1-No-Action Alternative

Under the No-Action Alternative, GSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West facility. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore, Maryland and a new facility for portions of the SSA's Headquarters operations located at the Metro West facility would not be constructed. Under this alternative, there would be no impacts to existing surface water or groundwater resources at the existing facilities.

4.1.1.2 Alternative 2 – Wabash Avenue Site

Under Alternative 2, it is anticipated that the construction of the SSA facility would not impact groundwater or surface water resources because the site is already paved and developed. Groundwater would not be used for potable water for the SSA facility. Powder Mill Branch is situated to the north and west of the property and construction and clearing activities would not occur within riparian buffers or in the stream channel.

During the operation of the SSA facility, there will be continued runoff, sedimentation, and pollutants from the building and parking lot. However, this area is currently paved and no impacts are expected. Landscaped areas that receive pesticide and fertilizer applications may contribute to water quality impacts; however these impacts will not be significant.

Cumulative Impacts

Past development at the Wabash Avenue Site has resulted in increased impervious surfaces. The site is bordered by existing developments. Any future development in the area would also result in impervious surfaces that could also have a negative cumulative effect on water quality, stormwater runoff volumes, and groundwater recharge. By following the appropriate State and local requirements for stormwater quality and quantity controls, the severity of these impacts would be reduced.

Overall, there would be no significant impacts to water resources as a result of the proposed action.

4.1.1.3 Alternative 3 – Liberty Village Site

Under Alternative 3, no impacts to surface water or groundwater would occur. Groundwater would not be used for potable water for the SSA facility and there is not surface water located on site. Therefore, the placement of the SSA facility would not impact surface water or groundwater resources.

Under Alternative 3, groundwater recharge at the Liberty Village Site would be reduced by the addition of impervious surfaces, such as parking lots and buildings, especially if Parcels 2 and 3 are developed. The increase in impervious surfaces would also increase runoff volume. Additionally, construction activities may increase the runoff of sediments that could adversely impact water quality in the watershed. During the operation of the SSA facility, there will be continued runoff, sedimentation, and pollutants from the building and parking lot. However, this area is currently paved and impacts are expected to be no greater than currently seen. Landscaped areas that receive pesticide and fertilizer applications may contribute to water quality impacts; however, these impacts will not be significant.

Cumulative Impacts

Past development at the Liberty Village Site has resulted in increased impervious surfaces. The site is bordered by existing developments. Any future development in the area would also result in impervious surfaces that could also have a negative cumulative effect on water quality, stormwater runoff volumes, and groundwater recharge. By following the appropriate State and local requirements for stormwater quality and quantity controls, the severity of these impacts would be reduced.

Overall, there would be no significant impacts to water resources as a result of the proposed action.

4.1.1.4 Mitigation Measures for Water Resources Impacts

No mitigation is necessary.

4.1.2 VEGETATION AND WILDLIFE

4.1.2.1 Alternative 1 - No-Action Alternative

Under the No-Action Alternative, GSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West facility. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore and a new facility for portions of the SSA's Headquarters operations located at the Metro West facility would not be constructed. Under this alternative, there would be no impacts to vegetation and wildlife at the existing facility.

4.1.2.2 Alternative 2 – Wabash Avenue Site

Construction and clearing activities would not occur within riparian buffers that surround the stream channel. No habitat loss for wildlife or removal of vegetation is anticipated. No vegetation other than landscaped areas would be removed and once construction is complete, the landscaping would be replaced. Therefore, no direct impacts are expected.

Under Alternative 2, noises and human activities consistent with construction and operation of typical office buildings would indirectly impact wildlife. However, the majority of these noise impacts would decrease upon completion of construction. Construction could also increase the amount of airborne pollutants that are harmful to vegetation and wildlife habitat. However, construction activities are expected to have little impact to air quality, and emissions from the operation of the SSA facility are estimated to be below *de minimis* thresholds and therefore have a slight effect on vegetation.

Cumulative Impacts

Past development at the Wabash Avenue Site has reduced native vegetation and wildlife habitat. Any future development off-site would further reduce vegetation and habitat. Any future development would also increase the amounts of airborne pollutants that are harmful to vegetation. Redevelopment of the Wabash Avenue Site would add to these impacts.

Overall, there would be no significant impacts to vegetation and wildlife as a result of the proposed action.

4.1.2.3 Alternative 3 – Liberty Village Site

The construction of the SSA facility on the Liberty Village Site would potentially require clearing or the removal of vegetation on Parcels 2 and 3. This clearing would eliminate habitat and displace resident and transient wildlife. Adjacent parcels are developed, and would not provide suitable habitat for displaced wildlife.

Under Alternative 3, noises and human activities consistent with construction and operation of typical office buildings would indirectly impact wildlife. However, the majority of these noise impacts would decrease upon completion of construction. Construction could also increase the amount of airborne pollutants that are harmful to vegetation and wildlife habitat. However, construction activities are expected to have little impact to air quality, and emissions from the operation of the SSA facility are estimated to be below *de minimis* thresholds and therefore have a slight effect on vegetation.

Cumulative Impacts

Past development at the Liberty Village Site has reduced native vegetation and wildlife habitat. Any future development off-site would further reduce vegetation and habitat. Any future development would also increase the amounts of airborne pollutants that are harmful to vegetation. Redevelopment of the Liberty Village Site would add to these impacts to vegetation and wildlife.

Overall, there would be no significant impacts to vegetation and wildlife as a result of the proposed action.

4.1.2.4 Mitigation Measures for Vegetation and Wildlife Impacts

No mitigation is necessary.

4.1.3 AIR QUALITY

4.1.3.1 Alternative 1 - No-Action Alternative

Under the No-Action Alternative, GSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West facility. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore and a new facility for portions of the SSA's Headquarters operations located at the Metro West facility would not be constructed. Under this alternative, there would be no impacts to air quality at the existing facility.

4.1.3.2 Action Alternatives

Impacts to air quality would be similar for both action alternatives and have been assessed below. Federal actions, for construction of new office facilities such as the SSA must be in conformity with the provisions of the Clean Air Act.

General conformity requirements are applied to certain Federal actions within air quality non-attainment and maintenance areas, including the construction of Federal office buildings, such as the proposed SSA building. The General Conformity rule can be considered to contain three major parts: applicability, procedure, and determination. Based on the following evaluation, it has been determined that the anticipated emissions would be sufficiently small that no further action is required.

In the case of ozone, the precursor emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) are considered. Once these emissions have been evaluated, a determination can be made with respect to the applicability of the rules. If the total emissions are below *de minimis* levels, the rules are not applicable. For the City of Baltimore, the *de minimis* levels have been set at 50 tons per year (tpy) of VOCs or NO_x and 100 tpy of carbon monoxide.

The following are potential emission sources from the proposed SSA:

- construction activities
- heating/cooling facilities
- mobile sources, including employee commuting

Construction activities are expected to have impacts to air quality, with emissions limited in both magnitude and duration. According to EPA, these operations are of greater significance in areas that are nonattainment for particulates, which includes the City of Baltimore. Further, emissions from the operation of modern, efficient heating and cooling equipment for 538,000 rentable square-foot buildings are estimated to be below *de minimis* thresholds.

Under either of the action alternatives, motor vehicles traveling to and from the sites would increase. With the Wabash Avenue Site, three intersections would operate at unacceptable LOSs and two intersections at the Liberty Village Site would operate at unacceptable LOSs (see Section 4.4.2). Because some intersections currently operate at unacceptable LOSs and there would be an increase in traffic, the additional cars would generate an increase in emissions from having to stop at these intersections and wait until they are able to pass through. With the implementation of mitigation proposed under Section 4.4.2.5, Traffic and Transportation, the impacts to air quality would not have a significant impact on the environment.

Cumulative Impacts

Baltimore is a non-attainment area for ozone and particulate matter. Past and present development has contributed to this. Any future development surrounding either site, in addition to the proposed action would continue this trend creating impacts on air quality.

Overall, the impacts to air quality would not have a significant impact on the environment as long as mitigation measures proposed under Section 4.4.2.5, Traffic and Transportation are implemented.

Conclusions of General Conformity Review

This review has considered the precursors of ozone, VOCs, and NOx. The largest stationary source, the heating equipment, would be subject to permit review requirements; consequently, systems would be re-examined comprehensively during the permitting stage of the project, when more precise design information is available. However, based on the size of the proposed facility and projects of similar size and scope, it is estimated that emissions would fall below the *de minimis* levels established under General Conformity. Consequently, the General Conformity procedures are not applicable to the proposed action.

4.1.3.3 Mitigation Measures for Air Quality Impacts

See mitigation proposed under Section 4.4.2.5, Traffic and Transportation for mitigation measures that would address air quality impacts.

4.1.4 NOISE

4.1.4.1 Alternative 1 - No-Action Alternative

Under the No-Action Alternative, GSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West facility. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore and a new facility for portions of the SSA's Headquarters operations located at the Metro West facility would not be constructed. Under this alternative, there would be no new impacts at the existing facility.

4.1.4.2 Action Alternatives

Under both Action Alternatives, temporary increases in noise levels within the immediate vicinity of the site would occur during construction.

During operation, the proposed SSA facility would produce low-level noises from ventilation equipment, which would have an impact on employees at the site and impacts on residents and businesses surrounding the project site. These alternatives are located within an urban area and these types of noises are typical.

Noise associated with traffic increases due to the construction of the SSA facility is expected to be minimal.

Cumulative Impacts

Past, present, and future development in addition to the proposed the SSA facility, would have cumulative effects on noise levels.

Overall, the minimal impacts associated with increased noise levels would not have a significant impact on the environment.

4.1.4.3 Mitigation Measures for Noise Impacts

No mitigation is necessary.

4.2 SOCIAL ENVIRONMENT

4.2.1 LAND USE PLANNING AND ZONING

Land use and zoning impacts attributable to a project are determined by changes to the site and the surrounding area, including changes in density and use, induced development, spurred revitalization, or increased vacancy. Such changes are typically a function of the scale of the proposed development, proximity of other uses to the project site, existing zoning, the availability of vacant or underutilized land, the condition of surrounding buildings, and outside development forces.

4.2.1.1 Alternative 1 - No-Action Alternative

Under the No-Action Alternative, GSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West facility. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore and a new facility for portions of the SSA's Headquarters operations located at the Metro West facility would not be constructed. Under this alternative, there would be no impacts to land use or zoning at the existing facilities.

4.2.1.2 Alternative 2 - Wabash Avenue Site

Relocation of employees from the Metro West facility and construction of a new facility on the Wabash Avenue Site would result in a change in land use from a State training facility to Federal office space and parking. There would also be changes in land use from the removal of the current building and construction of a new facility. The change in land use would require a change in zoning.

Indirect impacts to the land uses associated with the development of the Wabash Avenue Site may result from the introduction of 1,918 employees to the area. These additional employees may bring an increased patronage to commercial establishments, and may prompt construction of new establishments resulting in additional changes in land use. The change in land use would potentially require a change in zoning.

Cumulative Impacts

The cumulative impact of development of the Wabash Avenue Site, along with past and future development, would continue to change land use to public uses. These changes would be in accordance with approved land use plans.

Overall, the changes in land use and zoning would not be significant.

4.2.1.3 Alternative 3 – Liberty Village Site

Relocation and construction of the SSA Headquarters on the Liberty Village Site would result in a change in land use from healthcare facilities (Parcels 1 and 2) and wooded, undeveloped areas (Parcels 2 and 3) to Federal office space and parking. There would also be changes in land use from the removal of the current building and construction of a new facility and the extension of utility lines onto Parcels 2 and 3. The change in land use would require a change in the PUD and a change in zoning.

Indirect impacts to the land uses associated with the development of the Liberty Village Site may result from the introduction of 1,918 employees to the area. These additional employees may bring an increased patronage to commercial establishments, and may prompt construction of new establishments, resulting in additional changes in land use. The changes in land use would also require a PUD and/or a change in zoning.

Cumulative Impacts

The cumulative impact of development of the Liberty Village Site, along with past and future development, would increase commercial and residential land uses. These changes would be in accordance with approved land use plans.

Overall, the changes in land use and zoning would not be significant.

4.2.1.4 Mitigation Measures for Land Use & Planning Impacts

No mitigation is necessary.

4.2.2 ECONOMY AND EMPLOYMENT

4.2.2.1 Alternative 1 - No-Action Alternative

Under the No-Action Alternative, GSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West facility. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore and a new facility for portions of the SSA's Headquarters operations located at the Metro West facility would not be constructed. Under this alternative, there would be no impacts to economic or employment conditions.

4.2.2.2 Action Alternatives

With the construction of a new facility, the SSA would vacate the Metro West facility at 300 North Greene Street, Baltimore, Maryland, roughly seven miles from the proposed Wabash Avenue Site and approximately 3 miles from the proposed Liberty Village Site. The move could have an impact on retail businesses near the Metro West facility due to the loss of employees in the area. However, it is possible that the office space would be leased to new businesses, which would lessen the impact on the retail and office businesses. No long-term impact on the economy in the City of Baltimore is anticipated.

Regional economic activity would increase as local construction contractors and construction firms are hired for the project. The purchase of building materials, construction supplies, and construction equipment, as well as spending by the construction workers, would add income to the economy.

Increased employment opportunities may occur from jobs related to the construction of the facility. Long-term, approximately 318 new employees would be hired at the SSA facility, which would positively impact employment in the City of Baltimore.

Daily spending by the SSA employees would positively affect the area where the facility is constructed. These expenditures commonly include gasoline, automobile servicing, food and beverages, laundry, and other retail purchases undertaken in the immediate area because of convenience and access during the course of the business day.

Cumulative Impacts

The cumulative impact of development near and surrounding the Wabash Avenue and Liberty Village Sites, along with past and present development has increased the economy and employment in the region. Any future development would also help to increase the economy and employment. The proposed action would continue this trend.

Overall, there would be no significant impacts to economy and employment as a result of the proposed action.

4.2.2.3 Mitigation Measures for Economy and Employment Impacts

No mitigation is necessary.

4.2.3 TAXES AND REVENUE

4.2.3.1 No-Action Alternative

Under the No-Action Alternative, the GSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West facility. The SSA headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore and the new facility for portions of the SSA's Headquarters operations located at the Metro West facility. Under this alternative, there would be no changes to State and local taxes and revenues.

4.2.3.2 Alternative 2 - Wabash Avenue Site

The Wabash Avenue Site is owned by the State of Maryland. Because the State of Maryland is a public entity, the property is not subject to property taxes. If the SSA relocates to the Wabash Avenue Site, the Maryland Department of Assessments and Taxation would conduct a review to determine if the property is or is not subject to State property taxes. If the site remains tax exempt, there would be no direct impacts to taxes or revenues. If the private owner of the building is required to pay property taxes, the State of Maryland would see an increase in property taxes.

Construction workers employed for the construction period are assumed to be currently employed, and residing and paying taxes within the State of Maryland. Increased sales transactions for the purchase of materials and supplies would generate some additional revenues for local and State governments, which would have a positive effect on taxes and revenues.

Secondary jobs related to the increased economic activity stimulated by the proposed action may be created. Additional retail services and business employment may result from the proposed action through a multiplier effect, yielding additional sales and income tax revenues for local and State governments, thus having positive impacts.

Cumulative Impacts

Past, present, and future development in the vicinity of the Wabash Avenue Site has created revenue for the State, County, and local governments. If the Wabash Avenue Site remains tax exempt, the proposed action would not add to these benefits. However, if the private owner of the building is required to pay property taxes, there would be a cumulative impact on taxes and revenues.

Overall, there would be no significant impacts to taxes and revenues as a result of the proposed action.

4.2.3.3 Alternative 3 - Liberty Village Site

The Liberty Village Site is owned by New Hospital, Inc. Because New Hospital, Inc. is a private entity, the property is subject to property taxes. If the Liberty Village Site is selected, the property owner would continue to contribute real estate taxes to the State of Maryland and the City of Baltimore because the property would remain in private ownership and would not be removed from the tax base under a lease construction option.

Construction workers employed for the construction period are assumed to be currently employed, and residing and paying taxes within the State of Maryland. Increased sales transactions for the purchase of materials and supplies would generate some additional revenues for local and State governments, which would have a positive effect on taxes and revenues.

Secondary jobs related to the increased economic activity stimulated by the proposed action may be created. Additional retail services and business employment may result from the proposed action through a multiplier effect, yielding additional sales and income tax revenues for local and State governments, thus having positive impacts.

Cumulative Impacts

Past, present, and future development in the vicinity of the Liberty Village Site has created revenue for the State, County, and local governments, which has created cumulative impacts on taxes and revenues.

Overall, there would be no significant impacts to taxes and revenues as a result of the proposed action.

4.2.3.4 Mitigation Measures for Taxes and Revenue Impacts

No mitigation is necessary.

4.2.4 AESTHETICS AND VISUAL RESOURCES

The area of visual influence or viewshed provides the context for assessing aesthetic and visual resource impacts. Impacts to identified views and vistas were determined based on an analysis of the existing quality of the landscape views, the sensitivity of the view, and the anticipated relationship of the scale and massing of the proposed buildings to the existing visual environment.

4.2.4.1 Alternative 1 - No-Action Alternative

Under the No-Action Alternative, GSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West facility. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore and a new facility for portions of the SSA's Headquarters operations located at the Metro West facility would not be constructed. Under this alternative, there would be no change to the existing viewshed.

4.2.4.2 Alternative 2 - Wabash Avenue Site

Construction of the SSA facility on the Wabash Avenue Site would change the aesthetics of the site with the addition of a new Federally leased office building. This change would be most noticeable onsite and to the east. Views of the building would be blocked by wooded areas to the west and south and by the tree line to the north. Indirectly, visual impacts may occur if additional development takes place as a result of the proposed action.

Cumulative Impacts

Continued development of the area surrounding the site would contribute to a more densely developed environment. Therefore, cumulative impacts would occur under this alternative.

Overall, there would be no significant impacts to aesthetics and visual resources as a result of the proposed action.

4.2.4.3 Alternative 3 – Liberty Village Site

Construction of the SSA on the Liberty Village Site would change the aesthetics of the site with the addition of a new Federally leased office building. Views of the building would be partially blocked by a wooded area along the western border of Parcels 1 and 2. Construction on Parcels 2 and 3 would change the aesthetics of the site by removing wooded and grassy areas and replacing them with parking facilities. This change would be most noticeable onsite and from the adjacent houses on the eastern border of the site. Indirectly, visual impacts may occur if additional development takes place as a result of the proposed action.

Cumulative Impacts

Continued development of the area surrounding the site would contribute to a more densely developed environment. Therefore, cumulative impacts would occur under this alternative.

Overall, there would be no significant impacts to aesthetics and visual resources as a result of the proposed action.

4.2.4.4 Mitigation Measures for Visual and Aesthetic Impacts

No mitigation is necessary.

4.3 CULTURAL ENVIRONMENT

The proposed action must be evaluated to determine its effect upon resources listed in or determined eligible for the National Register of Historic Places (NRHP). Guidelines for this evaluation are set forth in the regulations of the Advisory Council on Historic Preservation at 36 CFR Part 800, effective January 11, 2001. The regulations [36 CFR § 800.16(i)] define an effect on a historic property as "...an alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." GSA has initiated consultation under Section 106 of the National Historic Preservation Act with MHT. See Appendix A for agency correspondence.

4.3.1 HISTORIC RESOURCES

4.3.1.1 Alternative 1 – No-Action Alternative

Under the No-Action Alternative, GSA would not utilize the sites studied in this EA for the proposed relocation of the SSA Headquarters from the Metro West Building. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore and the proposed SSA Headquarters would not be constructed. Under this alternative, there would be no impacts to historic resources at the existing facility.

4.3.1.2 Alternative 2 – Wabash Avenue Site

As there are no historic resources within the APE of the Wabash Avenue Site alternative, there would be no impacts to historic resources under this alternative.

4.3.1.3 Alternative 3 – Liberty Village Site

No historically significant resources are located within the parcel boundaries or directly adjacent to the parcels of the Liberty Village Site. Construction of the new SSA facility would have no direct impacts on historic resources possibly located within the APE, including Druid Hill Park Historic District located approximately 0.1 mile east of this alternative site. The new facility would not introduce any elements that would adversely impact those qualities that make the Druid Hill Park Historic District eligible for the National Register.

Construction of the new SSA facility has the potential to have an adverse impact on the viewshed of several historic resources that are in close proximity to the project site. Changes in views could be possible from the seven historic resources described in Section 3.4.1. The immediate vicinity of the Liberty Village Site and the subject parcels themselves have experienced new development in previous years. The construction of the new facility would not add types of structures that do not already exist in the surrounding residential, commercial, and industrial landscape and the visual impact of replacing the present facilities with an office building would be minimal.

Cumulative Impacts

Past, present, and future development in addition to the potential development on the project site has the potential to cumulatively affect historic resources for reasons stated above.

Overall, there would be no significant impacts to historic resources as a result of the proposed action.

4.3.1.4 Mitigation Measures for Historic Resource Impacts

No mitigation is necessary.

4.4 INFRASTRUCTURE

4.4.1.1 Alternative 1 - No-Action Alternative

Under the No-Action Alternative, GSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West facility. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore and a new facility for portions of the SSA's Headquarters operations located at the Metro West facility would not be constructed. Under this alternative, there would be no changes to utilities at the existing facility; therefore, there are no impacts to utilities at the existing facilities.

4.4.1.2 Action Alternatives

Construction of the SSA facility on the Wabash Avenue and Liberty Village Sites would require the extension of water, sewer, electric power, natural gas, and telecommunications lines from existing on-site or adjacent services to the new office building and parking facilities. Increases in demand for utilities are not anticipated.

During construction, the possible relocation of and connection to utilities would be completed with the least amount of disruption possible to current users. Traffic delays may also occur within street rights of way or from the installation and connection of public utilities.

Cumulative Impacts

Past, present, and future development in the area would place additional demands on the existing utilities. While the utility companies plan for regional growth, each future project would have to prepare studies to determine if their supply is adequate. The SSA facility would contribute to these cumulative impacts.

Overall, there would be no significant impacts to utilities as a result of the proposed action.

4.4.1.3 Mitigation Measures for Utility Impacts

No mitigation is necessary.

4.4.2 TRANSPORTATION

The evaluation of transportation impacts for the relocation of 1,918 employees from the Metro West Facility to new leased space at the Wabash Avenue or Liberty Village Sites was based on the policies and guidelines established by the *Highway Capacity Manual* (TRB, 2000). This evaluation assumes complete build out of the SSA facility by the year 2011.

4.4.2.1 Alternative 1 - No-Action Alternative

Under the No-Action Alternative, SSA would not relocate 1,918 employees to either of the sites. The No-Action Alternative includes future anticipated peak hour traffic volumes for roadways near the project area without the SSA employees. These volumes are the sum of the existing traffic volumes, plus the background growth (2 percent) in the area and the approved unbuilt developments in the study area.

Traffic Operations Analysis

Approved developments that are not yet built or occupied are included in the No-Action Alternative traffic analysis. A list of approved background developments was obtained from the City of Baltimore. It is assumed that these developments will be constructed by 2011.

Discussions with City of Baltimore's Department of Transportation and Department of Planning have indicated that they will require a 2 percent regional growth factor for calculating the base volume for the year of 2011. This is based on previous trends and represents the regional growth in traffic due to developments outside the study area.

Wabash Avenue Site

The 2 percent annual growth rate was applied to all the movements at the Wabash Avenue Site. According to the City of Baltimore, approved development near the Wabash Avenue Site includes a new church and a new residential community. Table 4-1 lists the land uses proposed by this development and identifies the associated trip generation for the Wabash Avenue Site. The number of vehicle trips generated by these developments was estimated using rates documented in *Trip Generation Manual* (ITE, 2001) and the approved traffic studies.

Table 4-1: Approved Background Developments-Wabash Avenue Site

Land Use	Code	Size	Unit	AM Peak			PM Peak		
				In	Out	Total	In	Out	Total
Church (New Psalmist Church*)		4000	SEATS	470	65	535	85	410	495
Single Family Residential (Brighton Manor **)	210	30	DU	5	20	25	20	10	30

* Traffic analysis of New Psalmist Church prepared by The Traffic Group

** Brighton Manor Traffic Impact Study prepared by Sabra, Wang & Associates, Inc.

In addition, the following roadway improvements are programmed near the Wabash Avenue Site under the No-Action Alternative:

- Patterson Avenue/Wabash Avenue/Vincennes Avenue
 - An additional westbound left-turn lane is being proposed.

Conditions under the No-Action Alternative were evaluated using the methodology mentioned previously. The background traffic and the planned roadway improvements were included in the analysis. The LOS results are graphically depicted in Figure 4-1 and presented in Table 4-2.

Results of the CLV analysis indicate that under the No-Action Alternative, all of the study intersections are expected to operate at acceptable LOSs during both AM and PM peak hours.

HCM analysis results shows that all the study intersections are expected to operate at an acceptable LOS with the exception of the intersection of Wabash Avenue/Patterson Avenue, which is expected to operate at LOS F during the PM peak hour.

Liberty Village Site

The 2 percent annual growth rate was applied to all the movements at the Liberty Village Site. According to the City of Baltimore, approved development near the Liberty Village Site includes upgrades to Mondawmin Mall. Table 4-3 lists the land uses proposed by this development and identifies the associated trip generation for the Liberty Village Site. The number of vehicle trips generated by these developments was estimated using rates documented in *Trip Generation Manual* (ITE, 2001) and the approved traffic studies.

Table 4-2: No-Action Alternative – Wabash Avenue Site

Intersection	CLV		HCM	
	AM (CLV)	PM (CLV)	AM (DEALY)	PM (DELAY)
Wabash Avenue / Vincennes Avenue / Patterson Avenue	A (971)	D (1,379)	D (44.8)	F (89.3)
Wabash Avenue/Mt. Hope Drive	A (675)	A (650)	B (13.2)	B (12.0)
Wabash Avenue/ W. Northern Parkway	B (1,061)	D (1,415)	C (27.4)	D (46.2)
Liberty Road/Patterson Avenue	B (1,137)	D (1,414)	C (26.4)	D (44.7)
Liberty Road/W. Northern Parkway	B (1,065)	B (1,133)	B (14.8)	B (16.1)

X(XXX) = LOS (CLV)

N(N.N) = LOS (DELAY IN SEC/HR)

In addition, the following roadway improvements are planned near the Liberty Village Site under the No-Action Alternative:

- Reisterstown Road/Gwynn Falls Parkway
 - Northbound and Southbound left turns are prohibited during AM and PM peak hours

Conditions under the No-Action Alternative were evaluated using the methodology mentioned previously. The background traffic and the planned roadway improvements were included in the analysis. The LOS results are graphically depicted in Figure 4-2 and presented in the Table 4.4.

As can be seen in Table 4-4, CLV analysis results indicate that all the study intersections are expected to operate at LOS D or better during both AM and PM peak hours with the exception of the intersection of Reisterstown Road/Liberty Heights Avenue, which is expected to operate at LOS E during the PM peak hour.

HCM analysis results show that all the study intersections are expected to operate at an acceptable LOSs during AM and PM peak hours with the exception of the southbound left turn movement at the Liberty Heights Avenue/Ocala Avenue intersection, which is expected to operate at LOS E and LOS F during the AM and PM peak hours respectively.

Table 4-3: Approved Background Developments-Liberty Village Site (Mondawmin Mall*)

Land Use	Code	Size	Unit	AM Peak			PM Peak		
				In	Out	Total	In	Out	Total
Restaurant	934	12,250	SF	330	320	650	215	200	415
Big Box+Jr. Box	820	155,000	SF	125	80	205	400	435	835
Grocery Store	850	67,200	SF	190	120	310	350	335	685
Transit Reduction (25%)				-160	-130	-290	-240	-245	-485
Developments Subtotal				485	390	875	725	725	1450
Credits									
Retail to be Demolished	820	50,700	SF	65	40	105	190	210	400
Grocery to be demolished	854	33,300	SF	50	40	90	155	155	310
Murray's to be Demolished	854	3,250	SF	5	5	10	20	20	40
Transit Reduction (25%)				-30	-20	-50	-105	-105	-210
Credits Subtotal				90	65	155	260	280	540
Net Background Trips									
				395	325	720	465	445	910

* Mondawmin Mall Traffic Impact Study prepared by Gorove/Slade Associates, Inc.

Table 4-4: No-Action Alternative – Liberty Village Site

Intersection	CLV		HCM	
	AM (CLV)	PM (CLV)	AM (DELAY)	PM (DELAY)
Reisterstown Road/Gwynn Falls Parkway	A (826)	D (1,337)	B (10.1)	B (14.9)
Reisterstown Road/Liberty Heights Avenue	D (1,362)	E (1,481)	C (24.7)	D (37.0)
Liberty Heights Avenue/Ocala Avenue Southbound Left Turn Eastbound Left Turn	A (641)	A (586)	E (37.9) A (2.3)	F (55.0) A (1.1)
Liberty Heights Avenue/Druid Park Drive	A (727)	B (1,062)	B (13.2)	C (21.4)
Towanda Avenue/Druid Park Drive Eastbound Left Turn Westbound Left Turn Northbound Left Turn Southbound Left Turn	A (423)	A (490)	A (8.1) A (8.4) C (20.1) B (13.7)	- A (8.4) D (28.4) B (14.0)
Reisterstown Road/Druid Park Drive	A (757)	A (925)	B (19.5)	C (22.9)

X(XXX) = LOS (CLV)

N(N.N) = LOS (DELAY IN SEC/HR)

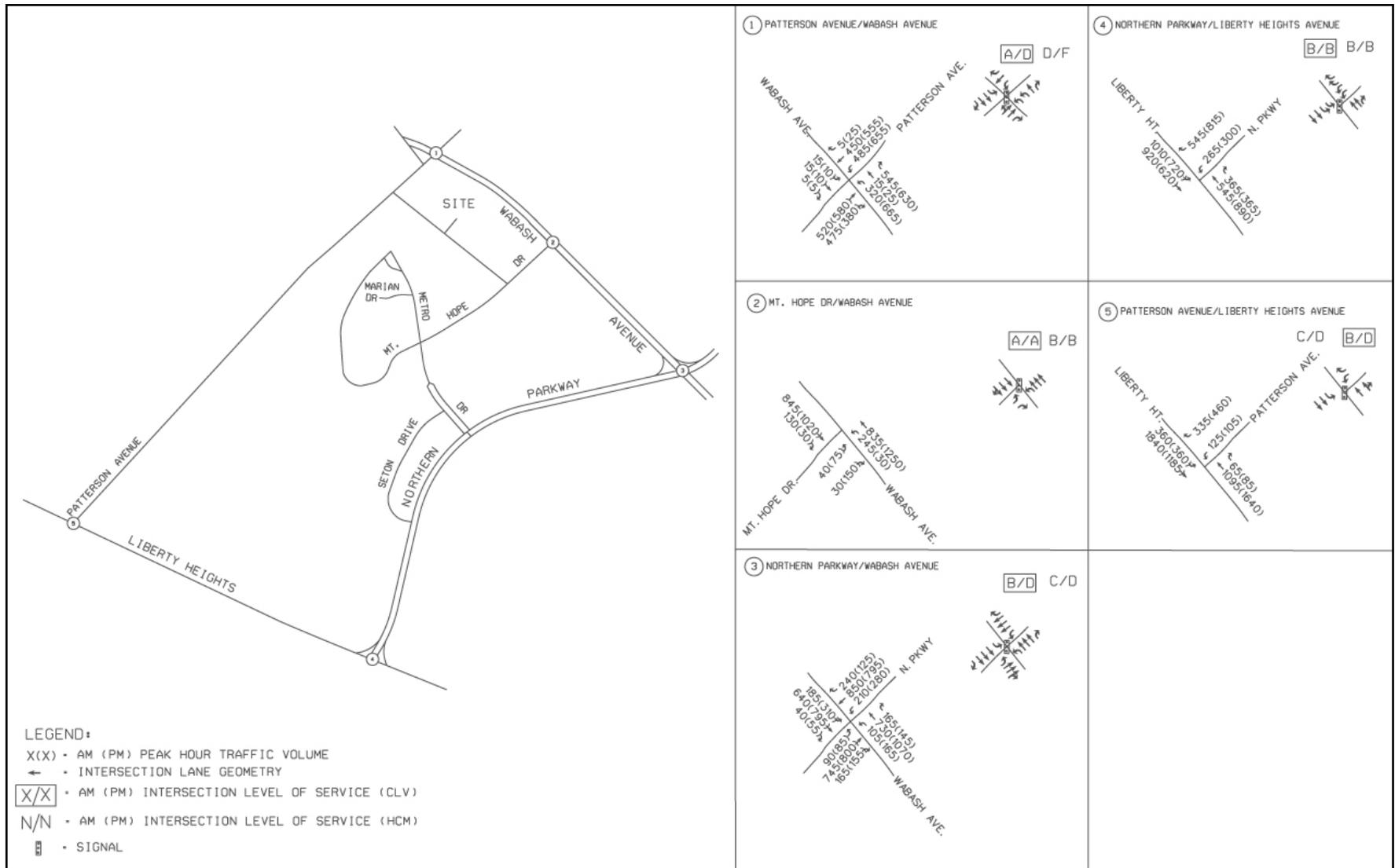


Figure 4-1: No-Action Alternative Traffic Volumes, Lane Geometries, and LOS Results - Wabash Avenue Site

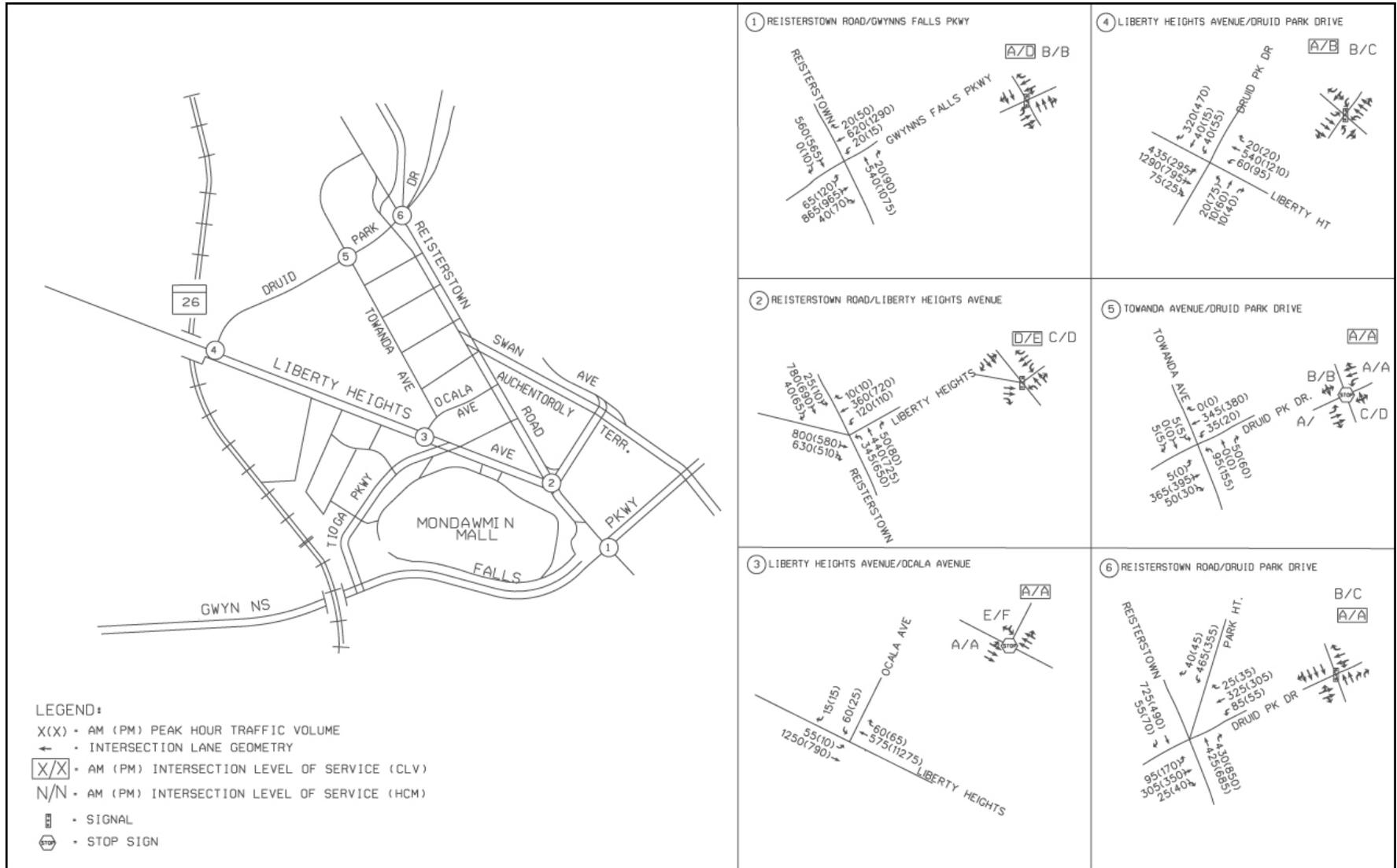


Figure 4-2: No-Action Alternative Traffic Volumes, Lane Geometries, and LOS Results - Liberty Village Site

4.4.2.2 Alternative 2 - Wabash Avenue Site

Under the Wabash Avenue Alternative, the SSA will move 1,918 employees to the Wabash Avenue Site. SSA will provide 1,076 parking spaces at the site.

Site Trip Generation

The number of vehicle-trips generated by the proposed development was estimated based on the rates documented in the *Trip Generation Manual* (ITE, 2001). Based on the traffic studies conducted previously, a 25 percent transit-trip reduction factor has been considered. However, based on discussion with the City of Baltimore, 15 percent transit trip reduction factors have been used for the Wabash Avenue Sites. The Wabash Avenue Site is in proximity of various transit options and abuts the northeastern boundary of the site.

Table 4-5 presents the estimated peak hour vehicle-trips generated by 1,918 SSA employees. As shown in Table 4-5, under the Wabash Avenue Alternative, SSA has the potential to generate approximately 720 vehicle trips during the AM peak hour and 655 vehicle trips during the PM peak hour.

Table 4-5: Trip Generation-Wabash Avenue Site

Land Use	Code	Size	Unit	AM Peak			PM Peak		
				In	Out	Total	In	Out	Total
General Office Building	710	1,918	EMP	745	100	845	130	640	770
15% Trip Reduction-Transit				-110	-15	-125	-20	-95	-115
Net Trips				635	85	720	110	545	655

Site Trip Distribution

The trip distribution of the 1,918 employees was estimated based on the existing traffic patterns, roadway system, and proximity of residential developments. The trip distribution percentages are presented in Figure 4-3 for the Wabash Avenue Site and they are as follows:

- 35 percent to/from the north along Patterson Avenue
- 35 percent to/from the west along Liberty Heights Avenue
- 10 percent to/from the east along Liberty Heights Avenue
- 10 percent to/from the north along Northern Parkway
- 10 percent to/from the east along Wabash Avenue

Site Trip Assignment

Figure 4-3 presents the site trip assignments for the Wabash Avenue Site. The Wabash Avenue Site would be accessible from Mt. Hope Drive and from an existing access point on Patterson Avenue, just south of Wabash Avenue.

Traffic Operations Analysis

Total Traffic Volumes were determined by adding the Site Traffic Volumes at the Wabash Avenue Site (Figure 4-3) to the No-Action Alternative Traffic Volumes (Figure 7A). Intersection capacity analyses were performed at the study intersections by both CLV and HCM methodology as mentioned previously. The results of the analysis are presented in Figure 4-4 and Table 4-6.

Table 4-6: Action LOS at Intersections Serving the Wabash Avenue Site

Intersection	CLV		HCM	
	AM (CLV)	PM (CLV)	AM (DELAY)	PM (DELAY)
Wabash Avenue/ Vincennes Avenue/ Patterson Avenue	C (1,233)	D (1,443)	D (54.0)	F (106.0)
Wabash Avenue/Mt. Hope Drive	B (1,006)	A (815)	C (21.7)	B (13.8)
Wabash Avenue/W. Northern Parkway	B (1,097)	E (1,474)	C (29.1)	D (53.6)
Liberty Road/Patterson Avenue	C (1,284)	E (1,574)	C (26.7)	F (87.1)
Liberty Road/W. Northern Parkway	B (1,110)	C (1,166)	B (17.7)	B (15.9)
Site Access/Patterson Avenue Westbound Left Turn	B (1,055)	D (1,360)	F (89.5)	F (**)

X(XXX) = LOS (CLV)

N(N.N) = LOS (DELAY IN SEC/HR)

(**) = Delay exceeds the limit of analysis method.

As can be seen in Table 4-6, CLV analysis results show that most of the study intersections will operate at LOS D or better during both AM and PM peak hours with the exception of the intersections of Wabash Avenue/W. Northern Parkway and Liberty Road/Patterson Avenue, which are expected to operate at LOS E during PM peak hour.

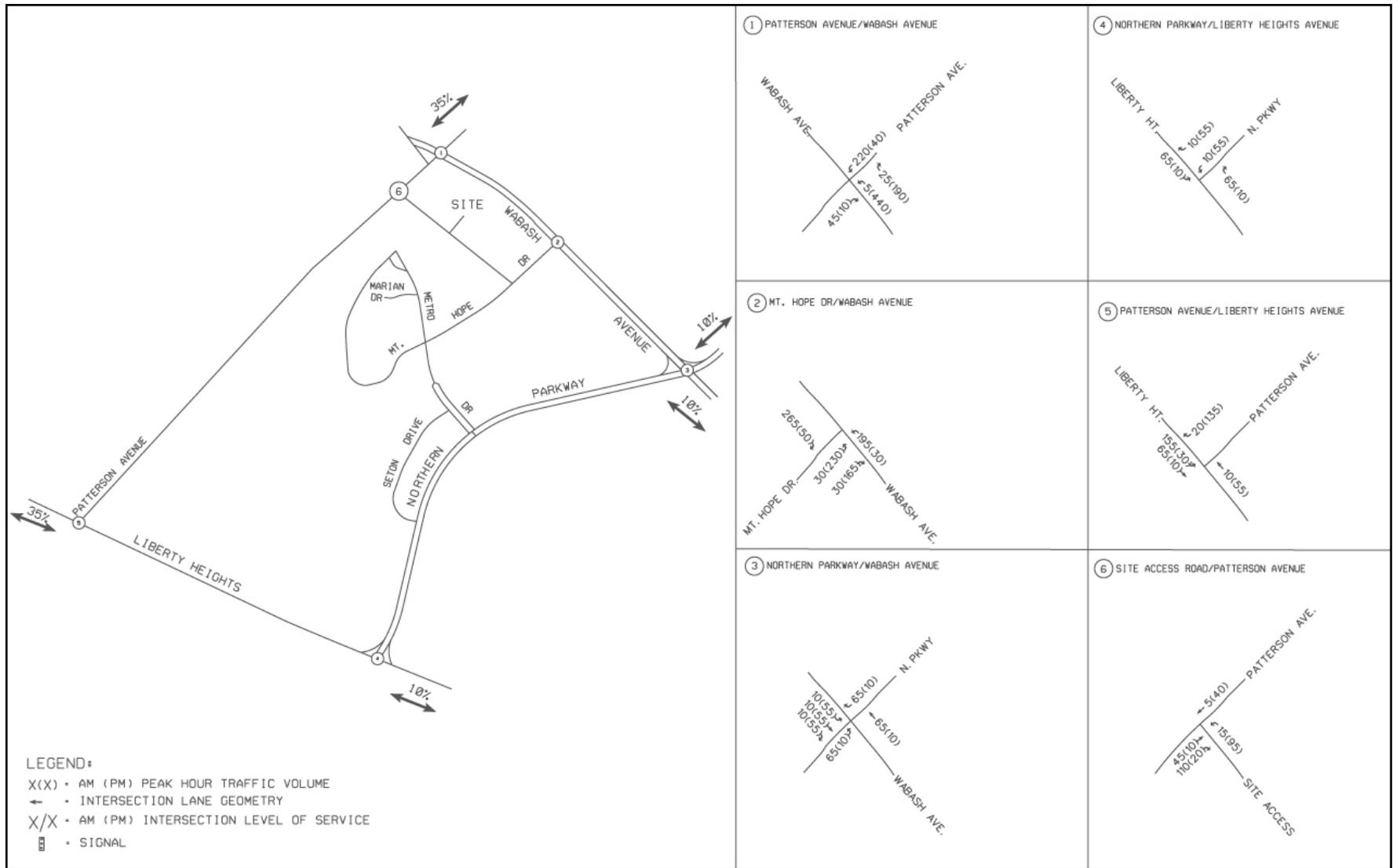


Figure 4-3: Site Trip Distribution and Assignment-Wabash Avenue

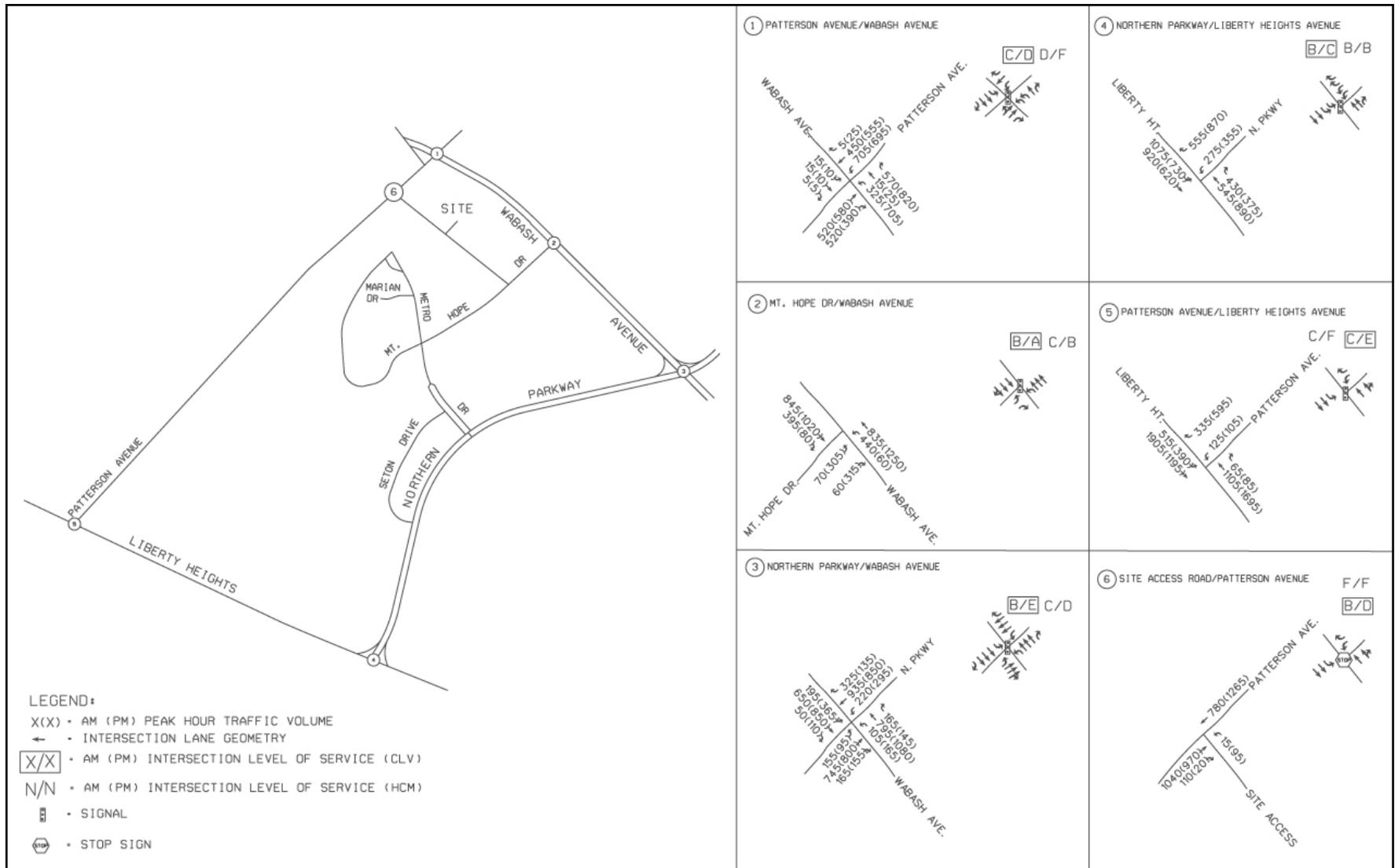


Figure 4-4: Traffic Volume, Lane Geometry, and Levels of Service - Wabash Avenue Site

HCM analysis results show that the intersections of Wabash Avenue/Mt. Hope Drive, Wabash Avenue/W. Northern Parkway and Liberty Road/W. Northern Parkway will operate at LOS D or better. The intersections of Wabash Avenue/Patterson Avenue and Liberty Road/Patterson Avenue will operate at LOS F during the PM peak hour, and the westbound left turn (WBLT) movement at the intersection of Site Access/Patterson Avenue will operate at LOS F during both the AM and the PM peak hours.

With this alternative, traffic would be added to the roadway system and local residents may experience longer traffic delays. The relocation of the Metro West facility to a site within the City of Baltimore would potentially spur development in the area and result in further changes to the surrounding land use. This would indirectly affect traffic by increasing the demand on the local roadway network.

With the mitigation proposed for the Wabash Avenue Site, the impacts to transportation would not have a significant impact on the environment.

4.4.2.3 Alternative 3 - Liberty Village Site

Under the Liberty Village Alternative, the SSA will move 1,918 employees to the Liberty Village Site. SSA will provide 1,076 parking spaces to the final proposed SSA facility site.

Site Trip Generation

The number of vehicle trips generated by the proposed development was estimated based on the rates documented in the Trip Generation Manual, (ITE, 2001). Based on the traffic studies conducted previously, a 25 percent transit-trip reduction factor has been considered. However, based on discussion with the City of Baltimore, 10 percent transit trip reduction factors have been used for the Liberty Village Site. The Liberty Village Site is in proximity of various transit options and is approximately 0.5 mile from the Mondawmin metrorail station.

Table 4-7 presents the estimated peak hour vehicle-trips generated by 1,918 SSA employees. As shown in Table 4-7, under the Liberty Village Alternative, the SSA has the potential to generate approximately 760 vehicle trips during the AM peak hour and 690 vehicle trips during the PM peak hour.

Table 4-7: Trip Generation-Liberty Village Site

Land Use	Code	Size	Unit	AM Peak			PM Peak		
				In	Out	Total	In	Out	Total
General Office Building	710	1,918	EMP	745	100	845	130	640	770
10% Trip Reduction-Transit				-75	-10	-85	-15	-65	-80
Net Trips				670	90	760	115	575	690

Site Trip Distribution

The trip distribution of the 1,918 employees was estimated based on the existing traffic patterns, roadway system, and proximity of residential developments. The trip distribution percentages are presented in Figure 4-5 for the Liberty Village Site and they are as follows:

- 30 percent to/from the north along Liberty Heights Avenue
- 15 percent to/from the north along Reisterstown Road
- 10 percent to/from the north along Park Heights
- 5 percent to/from the east along Druid Park Drive
- 10 percent to/from the east along Liberty Heights Avenue
- 10 percent to/from the south along Reisterstown Road
- 15 percent to/from the west along Gwynn Falls Parkway
- 5 percent to/from the east along Gwynn Falls Parkway

Site Trip Assignment

Figure 4-5 presents the site trip assignments for the Liberty Village Site. The Liberty Village Site would be accessible via Towanda and Ocala Avenues.

Traffic Operations Analysis

Total Traffic Volumes were determined by adding the Site Traffic Volumes at the Liberty Village Site (Figure 4-5) to the No-Action Alternative Traffic Volumes (Figure 4-2). Intersection capacity analyses were performed at the study intersections by both CLV and HCM methodology as mentioned previously. The results of the analysis are presented in Figure 4-6 and Table 4-8.

As can be seen in Table 4-8, CLV analysis results show that all the study intersections are expected to operate at LOS D or better during both the AM and the PM peak hours, with the exception of the intersection of Reisterstown Road/Liberty Heights Avenue, which is expected to operate at LOS E during both the AM and PM peak hours.

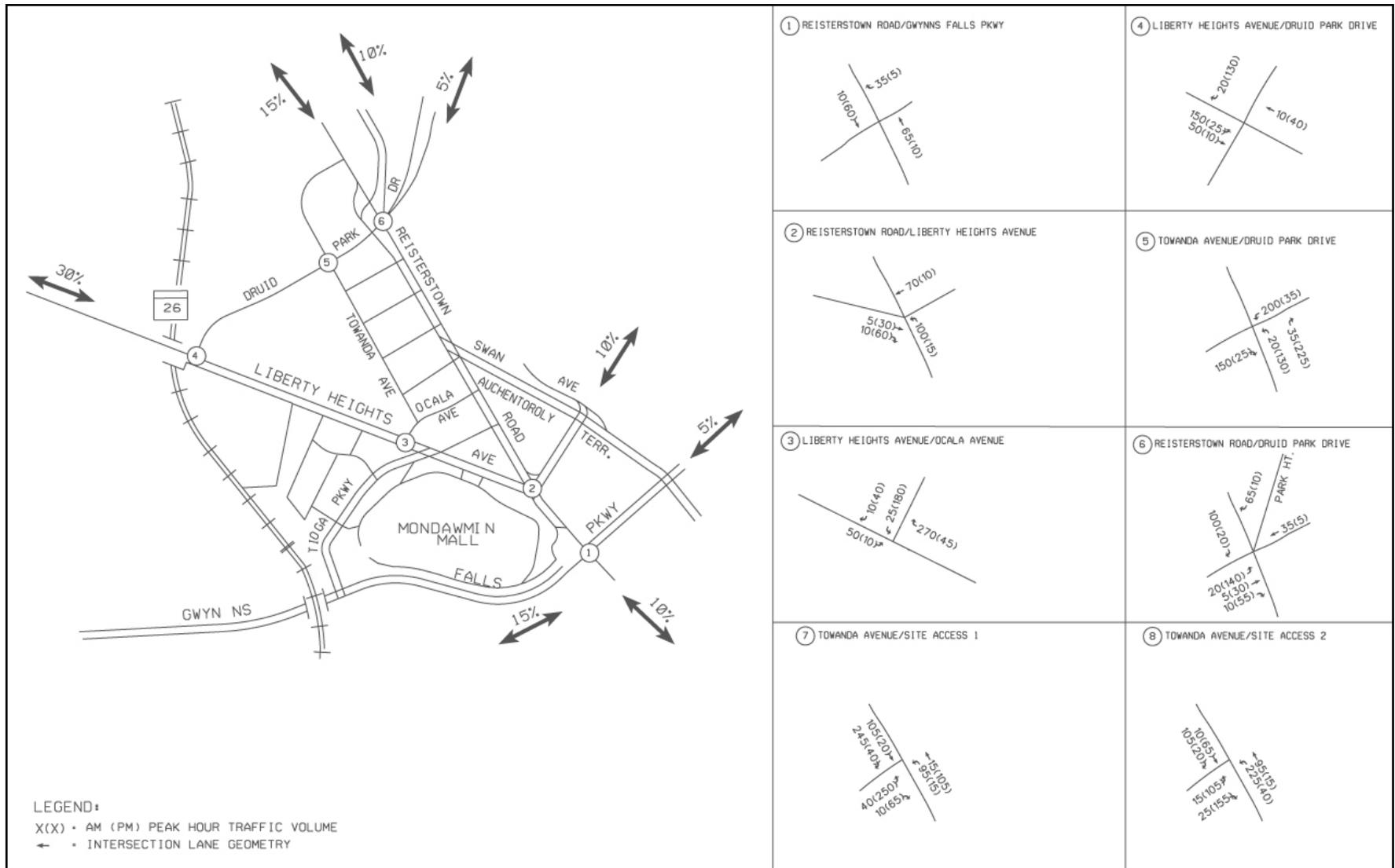


Figure 4-5: Site Trip Distribution and Assignment - Liberty village Site

Table 4-8: Action LOS at Intersections Serving the Liberty Village Site

Intersection	CLV		HCM	
	AM (CLV)	PM (CLV)	AM (DELAY)	PM (DELAY)
Reisterstown Road/Gwynn Falls Parkway	A (832)	D (1,341)	B (10.1)	B (15.1)
Reisterstown Road/Liberty Heights Avenue	E (1,465)	E (1,513)	C (28.7)	D (39.5)
Liberty Heights Avenue/Ocala Avenue Southbound Left Turn Eastbound Left Turn	A (778)	A (834)	F (152.4) A (4.8)	F (**) A (2.2)
Druid Park Drive/Liberty Heights Avenue	A (881)	C (1,208)	B (16.4)	C (29.0)
Druid Park Drive/Towanda Avenue Eastbound Left Turn Westbound Left Turn Northbound Left Turn Southbound Left Turn	A (763)	A (951)	A (8.1) B (10.1) F (225.9) D (26.8)	- A (8.6) F (294.7) D (26.3)
Reisterstown Road/Druid Park Drive/Park Heights	A (842)	D (1,308)	C (21.3)	C (30.2)
Site Access 1/Towanda Avenue Eastbound Left Turn Northbound Left Turn	A (495)	A (437)	B (12.4) A (7.3)	B (12.4) A (1.0)
Site Access 2/Towanda Avenue Eastbound Left Turn Northbound Left Turn	A (383)	A (399)	B (11.5) A (6.0)	B (11.4) A (2.4)

X(XXX) = LOS (CLV)

N(N.N) = LOS (DELAY IN SEC/HR)

(**) = Delay exceeds the limit of analysis method.

HCM analysis results show that all the study intersections are expected to operate at an acceptable LOS during both the AM and the PM peak hours, with the exceptions of two signalized intersections. The northbound left turn movement (NBLT) at Druid Park Drive/Towanda Avenue and the southbound left turn movement (SBLT) at Liberty Heights Avenue/Ocala Avenue are expected to operate at LOS F during both the AM and PM peak hours.

With this alternative, traffic would be added to the roadway system and local residents may experience longer traffic delays. The relocation of the Metro West facility to a site within the City of Baltimore would potentially spur development in the area and result in further changes

to the surrounding land use. This would indirectly affect traffic by increasing the demand on the local roadway network.

With the mitigation proposed for the Liberty Village Site, the impacts to transportation would not have a significant impact on the environment.

4.4.2.4 Public Transportation Analysis

Under the Action Alternatives, changes are not anticipated in the transit system supporting the SSA Site. Both sites are easily accessible by the Metro subway system and are serviced by several buses.

Metro Subway System

There are no anticipated changes to the Metro subway system. Both sites are in close proximity to a Metro station and there is adequate capacity to accommodate the SSA employees wishing to use this mode of transportation.

MARC Rail System

There are no anticipated changes to the MARC system. According to Maryland Transit Administration, MARC trains had approximately 32,600 riders per day (May 2008). There is adequate capacity to accommodate the SSA employees wishing to use this mode of transportation.

Light Rail System

There are no anticipated changes to the Light Rail System. The existing system is expected to be able to accommodate additional SSA employees wishing to take the Light Rail.

Bus System

Several bus routes presently provide service along Wabash Avenue, Reisterstown Road and Liberty Heights Avenue in the vicinity of Wabash Avenue and Liberty Village Sites. Since there are no connections between the Metro Subway System, the MARC Rail System, and the Light Rail System, buses could be used as a way to connect the employees traveling by MARC and/or Light Rail Systems to the sites.

Overall, because existing public transportation would be able to accommodate SSA employees, no significant impact on the environment would occur.

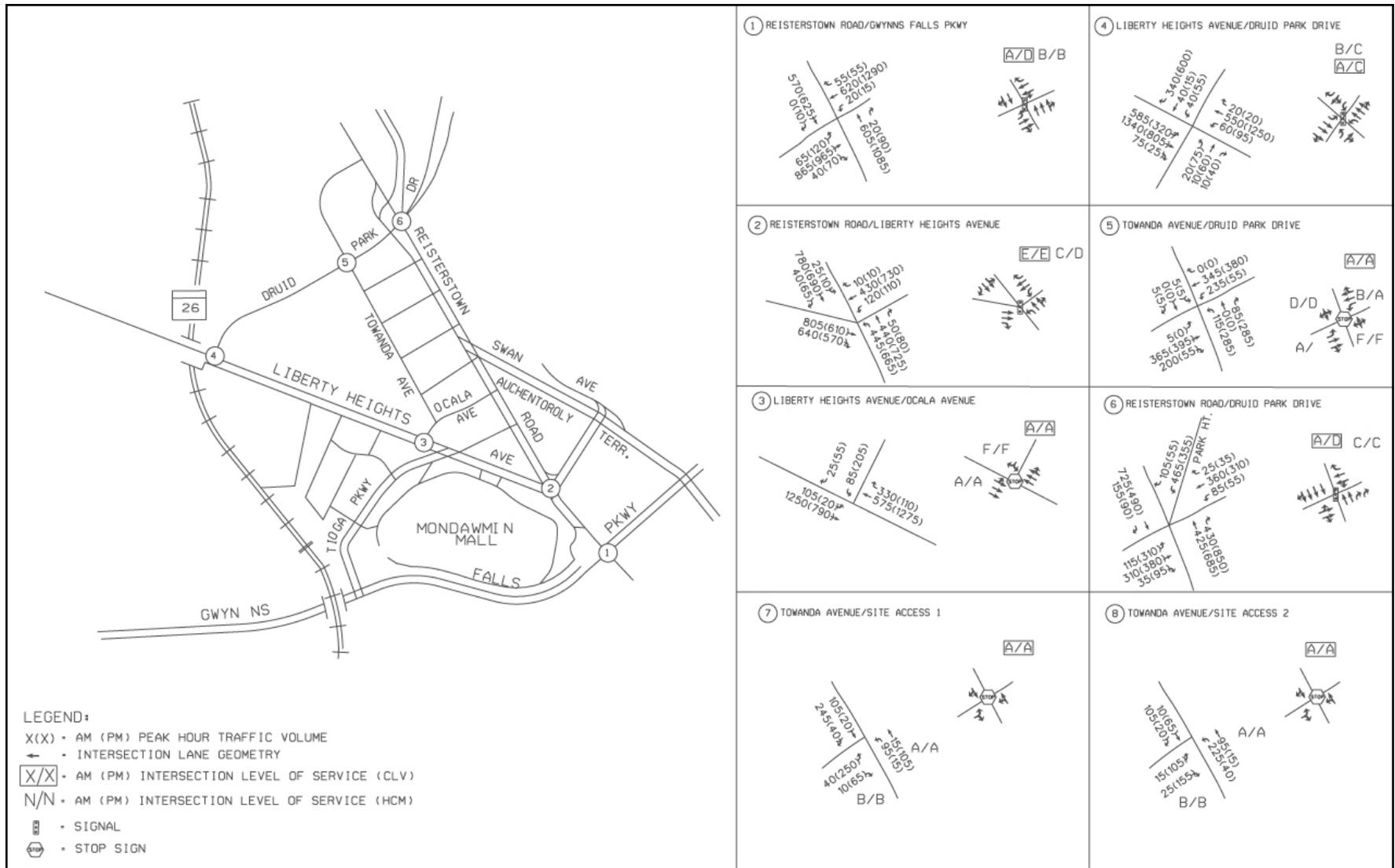


Figure 4-6: Traffic Volumes, Lane Geometry, and LOS Results - Liberty Village Site

4.4.2.5 Mitigation Measures for Transportation Impacts

As discussed under each alternative with the addition of the 1,918 SSA employees, some of the intersections at both the Wabash Avenue and the Liberty Village Sites are expected to operate at unacceptable conditions, therefore, creating a significant impact. In order to reduce the impact below the significance threshold, geometric/signal timing improvements will be needed to mitigate these impacts. These improvements are discussed in the section below. These mitigation measures also apply to the impacts to air quality as a result of the proposed action.

Wabash Avenue Alternative: The following improvements will be required in order to bring the delay to No-Action Conditions and thus to mitigate the SSA traffic:

- Wabash Avenue/Vincennes Avenue/Patterson Avenue: Provide a right-turn lane from Patterson Avenue to Wabash Avenue. This should be a free-flow right-turn. With this improvement, this intersection is expected to operate at LOS D (47.9) in the AM Peak and LOS E (60.9) in the PM Peak.
- Liberty Road/Patterson Avenue: Modify the signal timing at this intersection such that the westbound right turn movement from Patterson Avenue operates under a permitted/overlap phasing. With this improvement, this intersection is expected to operate at LOS C (25.4) in the AM Peak and LOS D (46.5) in the PM Peak.
- Site Access/Patterson Avenue: This intersection may meet the Manual of Uniform Traffic Control Devices (MUTCD) signal warrants. Volumes at this intersection would need to be monitored and a signal warrant study would need to be conducted to see if it meets the criteria to warrant a traffic signal at this intersection once the SSA employees have moved. As a signalized intersection, this intersection is expected to operate at LOS B (17.2) in the AM Peak and LOS C (26.7) in the PM Peak.

Liberty Village Alternative: The following improvements will be required in order to bring the delay to No-Action Conditions and thus to mitigate the SSA traffic:

- Liberty Heights Avenue/Ocala Avenue: This intersection is expected to meet the MUTCD signal warrants. Volumes at this intersection would need to be monitored and a signal warrant study would need to be conducted to see if it meets the criteria to warrant a traffic signal once the SSA employees have moved. As a signalized intersection, it is expected to operate at LOS B (11.3) in the AM Peak and LOS B (11.5) in the PM Peak.
- Towanda Avenue/Druid Park Drive: Prohibit the northbound left turn from Towanda Avenue to Druid Park Drive. Vehicles wishing to turn left will have the option of using the Liberty Heights Avenue/Ocala Avenue intersection. Without the northbound left turn movement, all movements at this intersection are expected to operate at LOS D or better during the peak hours.

4.4.3 WASTE MANAGEMENT

In Maryland, general waste is regulated under the Code of Maryland Regulations (COMAR) Title 25, Subtitle 4, Chapter 7. Hazardous waste is regulated under COMAR 26, Subtitle 13.

The Maryland Recycling Law, Annotated Code of Maryland, Environment Article, Title 9, Subtitle 17, requires that each County in the State establish a recycling plan. The City of Baltimore has established a plan, which encourages commercial businesses to recycle. Recycling is not mandatory for commercial businesses in the City of Baltimore.

4.4.3.1 No-Action Alternative

Under the No-Action Alternative, SSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West Facility. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore. Under this alternative, there would be no changes in waste management at the existing facilities. Therefore, no impacts to waste management would occur.

4.4.3.2 Action Alternatives

The volume of solid waste disposed of from either of the alternative sites would increase during construction activities of the new facility for the SSA. These impacts would be temporary.

For either of the two alternative sites, the SSA would generate general solid waste (including recyclable waste). General waste would be placed into receptacles located throughout the buildings, removed from these receptacles on a regular basis, and transported to compactors/dumpsters that will be located outside of the building. A licensed waste hauler would transport the general waste to the appropriate facility for disposal. The amount of waste generated by the SSA would have slight impact on the waste handlers at the facility.

The developer would schedule trash haulers to remove construction debris from the site. Traffic, air emissions, and fuel consumption associated with waste hauling would increase as a result of trash removal. However, these impacts would be temporary. The development of either site may spur development around the sites that could in turn, increase waste generation potentially creating an impact on waste management.

Cumulative Impacts

Past, present, and future development have increased waste generation on and surrounding each of the alternative sites. Construction of the SSA facility would add to these cumulative effects.

Overall, there would be no impacts to waste management as a result of the proposed action.

4.4.3.3 Mitigation Measures for Waste Management Impacts

No mitigation is necessary.

4.4.4 ENVIRONMENTAL CONTAMINATION

4.4.4.1 No-Action Alternative

Under the No-Action Alternative, SSA would not utilize the sites studied in this EA for the proposed relocation of the Metro West Facility. The SSA Headquarters would continue to use the Metro West facility located at 300 North Greene Street in Baltimore. Therefore, no environmental contamination would occur.

4.4.4.2 Alternative 2: Wabash Avenue Site

The visual site inspection identified an environmental issue associated with this site. The potential storage of explosive material on site within an explosives bunker represents a Recognized Environmental Condition. The explosives bunker would be cleared of its contents and all residues. If the bunker is empty, then no additional actions are required. The removal of hazardous materials and contaminants would have a beneficial impact.

Cumulative Impacts

Remediation and cleanup required as a result of the proposed action would result in a beneficial cumulative impact.

Overall, the proposed action would not have a significant impact on the environment.

4.4.4.3 Alternative 3: Liberty Village Site

The visual site inspection identified environmental issues associated with this site. Due to the age of the on-site structures, it is possible that ACMs, LBP, and PCB- and mercury-containing equipment may be present. Demolition of these structures and construction of a new facility would disrupt these hazardous materials and any undiscovered contamination at the site. Further, there are several USTs that have not been accurately documented on the site. The removal of hazardous materials and contaminants, and the removal of any USTs located on the site would have a beneficial impact.

Cumulative Impacts

Remediation and cleanup required as a result of the proposed action would result in a beneficial cumulative impact.

Overall, the proposed action would not have a significant impact on the environment.

4.4.4.4 Mitigation Measures for Environmental Contamination Impacts

No mitigation is necessary.

4.5 ADVERSE ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED

Environmental impacts for all alternatives have been described in detail in the previous sections of this chapter. In general, there would be unavoidable adverse effects due to the type of construction project that is proposed. If the SSA facility is constructed on the Liberty Village Site there will be a potential loss of greenspace. Potential loss of these vegetated areas would lead to an unavoidable loss of habitat for some animal species. In addition, for both sites there would be an increased demand for utilities and an increase in traffic densities in the area surrounding the sites, due to commuting employees.

4.6 RELATIONSHIP BETWEEN SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

4.6.1 ALTERNATIVE 1 - NO-ACTION ALTERNATIVE

Under the No-Action Alternative, there would be no effect in the short-term to the physical, social, or cultural environment. However, there would be an impact on the existing SSA facilities. Without the relocation, it would be difficult for the SSA employees to conduct their business efficiently with the limited and outdated resources that currently exist at the Metro West facility.

4.6.2 ACTION ALTERNATIVES

The long-term benefits of the proposed construction of the SSA facility at either the Wabash Avenue or Liberty Village Sites would occur at the expense of short-term impacts near the project site. These short-term effects would occur during the period of construction, and would include localized noise and air pollution, as well as traffic detours and delays. However, these impacts are temporary and proper controls would be utilized to prevent these impacts from having a lasting effect on the environment.

In addition to the construction of the facility building, extensions to existing utility lines to provide water service to the site; off-site and on-site sewer lines to provide sewage services; and electric and/or natural gas lines would be required. These infrastructure developments would cause further traffic delays during their respective construction periods. However, upon completion of the construction, traffic conditions should return to normal.

Short-term gains to the local economy would occur as local companies and workers are hired, and local businesses provide services and supplies during the construction of the facility and required infrastructure. However, upon completion of the proposed action, the gains to the local economy would evolve into a long-term benefit as over 1,918 permanent SSA employees move into the new facility and provide consistent business to the surrounding merchants.

4.7 IRREVERSIBLE OR IRRETRIEVABLE COMMITMENT OF RESOURCES

4.7.1 ALTERNATIVE 1 - NO-ACTION ALTERNATIVE

Under the No-Action Alternative, there would be no immediate commitment of resources relating to construction of a new SSA facility. However, there would be a continued use of utilities, fuel, and power at the existing facility. This would result in an irretrievable commitment of utilities, fuel, and power.

4.7.2 ACTION ALTERNATIVES

The proposed construction of a new SSA facility would result in the irreversible commitment of resources. A commitment of fuel, energy, construction materials, and labor would be required to construct the facility. There would be an additional long-term commitment of labor for the maintenance of the facility and the infrastructure. In addition, once the facility is in place, there is a commitment of utilities, fuel, and power. All of these resources relating to the construction and maintenance of the facility and its infrastructure should be considered irretrievably committed.

While there would be the above commitment of resources, through conservation practices, some of these resources, such as water supply, may be retrieved or committed at a lower rate than the present Metro West facility requires. In addition, the new facility will require a lower expenditure of funds, energy, and fuel than currently committed.

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