FINAL ENVIRONMENTAL IMPACT STATEMENT

Lexington Market Station Joint Development Project

Baltimore, Maryland

UMTA PROJECT NO. MD-03-0015

U.S. DEPARTMENT OF TRANSPORTATION
URBAN MASS TRANSPORTATION ADMINISTRATION

JUNE 1979

DEPARTMENT OF TRANSPORTATION
URBAN MASS TRANSPORTATION ADMINISTRATION
WASHINGTON, D.C. 20590

FINAL ENVIRONMENTAL IMPACT STATEMENT
AND 4(f) STATEMENT

LEXINGTON MARKET STATION
JOINT DEVELOPMENT PROJECT

BALTIMORE, MARYLAND

UMTA PROJECT MD-03-0015

This project is proposed for funding under an Urban Mass Transportation Administration capital grant.

This statement is submitted pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969; Sections 3(d) and 14 of the Urban Mass Transportation Act of 1964; Section 4(f) of the Department of Transportation Act of 1966; and Section 106 of the National Historic Preservation Act of 1966.

JUN 26 1970
Date

By: John K. Taylor
John K. Taylor
Associate Administrator
for Transit Assistance

PREFACE

This Environmental Impact Statement (EIS) has been prepared by the Urban Mass Transportation Administration (UMTA) of the U.S. Department of Transportation in cooperation with the City of Baltimore to document the environmental impacts of the proposed Lexington Market Station Joint Development Project.

The proposed joint development project, which would be designed to permit coordinated joint development activity to take place concurrently with rapid transit system construction, has been the subject of extensive discussion and review with local officials and the public since 1976. A Final Environmental Impact Statement for the Phase I/Section A line of the Baltimore Region Rapid Transit System (including the Lexington Market Station) was approved in June, 1972. This EIS does not constitute an environmental assessment of the rapid transit system project, with the single exception of the proposed change in location for the southeast public entrance of the Lexington Market Station.

The Draft EIS for the project was circulated to various Federal, State, and local agencies, and to interested organizations and individuals in accordance with applicable guidelines and regulations. UMTA received comments on the Draft for sixty (60) days after the official start of circulation on Friday, August 25, 1978. The City of Baltimore held a public hearing on the EIS for the proposed project on Tuesday, September 26, 1978 in Baltimore, Maryland. UMTA and the City of Baltimore have addressed all substantive comments received on social, economic, and environmental issues in this Final EIS. Changes from the Draft EIS are indicated by vertical margin lines in this final text.

Copies of the Final Statement may be obtained, as supplies permit, or inspected at:

Urban Mass Transportation Administration
Region III
434 Walnut Street, Suite - 1010
Philadelphia, PA 19106

Baltimore City Department of Planning
8th Floor
222 East Saratoga Street
Baltimore, MD 21202

Copies of the Final Statement may be inspected at:

PUBLIC LIBRARIES

Enoch Pratt Free Library Central Branch - 400 Cathedral St.

Light Street - 1251 Light St.

Northwood - 4420 Loch Raven Boulevard

Patterson Park - 158 N. Linwood Ave.

Pennsylvania - 1531 W. North Ave.

Roland Park - 5200 Roland Ave.

The Statement may also be purchased from:

The Environmental Law Institute
1346 Connecticut Ave., N.W.
Washington, D.C. 20036

SUMMARY

FINAL ENVIRONMENTAL IMPACT STATEMENT

Department of Transporation

Urban Mass Transportation Administration

1. Name of Action: Administrative Action

2. Description of Proposed Action:

A. The City of Baltimore, with UMTA federal grant assistance, proposes to undertake a joint development project at the center of the City's downtown retail district, adjacent to a major subway station on the rail rapid transit line now under construction. The proposed Lexington Market Station Joint Development project has been referred to locally as Baltimore Gardens. It is planned as a coordinated effort by the public and private sectors. Public sector funds (including the proposed federal assistance) would be used for real property acquisition; business relocation; demolition; site preparation; public improvements (including those associated with the extension and enlargement of the southeast public entrance facilities of the transit station); the disposition of development rights to designated portions of the proposed project site area, by sale or lease, to private development entities at the highest obtainable price as established by professional re-use appraisals; historic preservation costs; and a two-block extension of the City's Lexington Street Mall.

Private sector funds would be used for final planning, design, and the development of a multi-level commercial complex consisting of retail, department store, office, entertainment/recreational, parking, and possibly residential uses. The project would be located adjacent to, and would be physically integrated with, the Lexington Market Rapid Transit Station, at the center of the retail area and within the boundaries of the City's designated retail district urban renewal area. A significant element in the proposed action is the change in the location planned for the southeast public entrance facilities of the transit station. The planned development proposes a public plaza and pedestrian concourse opening directly into the mezzanine level of the station.

The proposed development program for the project site has been planned to accommodate the following range of developable square footage:

Public Plaza and Pedestrian Concourse:	25,000 - 40,000 square feet
Specialty Retail:	100,000 - 150,000 square feet
Department Store:	100,000 - 160,000 square feet
Entertainment/ Recreational Uses:	45,000 - 60,000 square feet
Office and/or Residential Uses:	up to 200,000 square feet
Parking:	400 spaces on-site
Lexington Street Mall:	two (2) block extension from Howard to Paca Street

The proposed project site consists of approximately 179,000 square feet of land area, of which 103,000 square feet is proposed for joint public/private development. The remainder of the site area would be used for the two-block extension of the Lexington Street Mall; for public improvements to that portion of Eutaw Street which lies above the Lexington Market Station; and for possible future construction of the southwest entrance to the Lexington Market Station. Approximately 50% of the project site is in the public domain, consisting of existing public rights-of-way and property acquired and cleared by the Mass Transit Administration for temporary use in transit system construction.

Certain of the remaining properties in that area have been purchased by the City. The remainder are in private ownership. The first phase of property acquisition, business relocation, and demolition activities for the proposed project is scheduled for completion during 1979. Construction of initial portions of the southeast public entrance facilities for the station, by the Maryland Mass Transit Administration, would be scheduled to begin in 1979. Final design, site preparation, design and construction of other public improvements, and preparation for private development of the site is scheduled for the period 1979 - 1985, which coincides with the opening and initial phase of revenue operations of the Section A rapid transit line.

B. The project is proposed to be funded, in part, with capital assistance under the Urban Mass Transportation Act of 1964, as amended. The estimated total project cost is $20 - 35 million, depending upon the amount of new private development planned for the project site. The public sector share of this amount would be $12.2 million, which would be used for property

acquisition, relocation, demolition, site preparation and historic preservation costs, and for the extension of the Lexington Mall and related public improvements, costs which are not affected significantly by the intensity of new development. Of the public sector funds, $9.8 million is proposed to come from Section 3, UMTA capital assistance funds. The City of Baltimore has made a commitment for expenditures in the amount of $2.5 million in the retail district, which includes the local matching funds for the UMTA Grant. The private sector funding will be provided by a developer to be selected by the City of Baltimore.

C. UMTA Project No. MD-03-0015

3. Summary of Effects:

A. Long-Term Beneficial Effects

1. Implementation of the joint development project would provide a catalyst for the much needed revitalization of the City's declining downtown retail district. It would serve as a stimulus for expansion and upgrading of existing retail/commercial establishments in the immediate vicinity and provide a basis for stabilizing, or partially reversing the decline in the City's share of regional retail sales. It would generate between approximately $33 million and $46 million in new annual retail sales depending upon the intensity of new development.

2. The project would provide a substantial net increase in local employment, and would generate additional public revenues as a result of increases in property values, construction activity, retail sales, and sale or lease revenues as a result of the disposition of development rights to designated portions of the project site.

3. The development of a mixed-use activity center directly adjacent to the Lexington Market rapid transit station would increase transit system ridership, strengthen usage patterns and provide new retail facilities readily accessible to the transit dependent population of the City.

4. The project would create additional employment opportunities, both in new facilities and in existing establishments which would benefit from activity increases and revitalization. Compared to the "no-action" conditions in the retail district projected for 1985, the net increase in employment is estimated at 1,200-1,500 jobs. Many of these jobs would be available to center city residents.

5. In terms of urban design, the joint development project would: 1) create a pedestrian and visual linkage between the transit station and other major downtown activity centers; 2) provide a functional and perceptual focal point for the retail core; 3) provide pedestrian amenities and separation of vehicular and pedestrian traffic; 4) provide a diversity of facilities and activities in the core area; and 5) create significant opportunities to extend the daily hours of activity in the City's downtown.

6. The project would serve to demonstrate the ability of the public and private sectors to undertake a cooperative joint development project which would have a positive impact upon the rapid transit system, the surrounding neighborhoods, and the City.

B. Long-Term Adverse Impacts

1. Implementation of the project would necessitate the acquisition of 1.65 acres of privately owned property consisting of 27 separate parcels of land owned by 21 different individuals, legal trusts or corporations. Project implementation would necessitate demolition of fourteen structures on these properties. The project requires the relocation of nine commercial establishments from the project site.

2. Certain historically significant buildings on the project site would be adversely affected. The Murphy Building at 320-322 West Lexington Street would be demolished. The developer selected by the City of Baltimore to undertake the project will evaluate the feasibility of adopting a preservation treatment for the interior of the Hutzler's Palace Building and will be encouraged to employ a treatment that retains the interior of the Hochschild-Kohn main building complex. If no preservation treatment is feasible, the interiors of these buildings may be restructured. The building facades at 200-218 North Howard Street and 300-310 West Lexington Street will be retained. The original, early 19th century front section of 223 N. Eutaw St. (Arthur's Bakery) would be relocated to a suitable relocation site and the later rear sections of the building would be demolished.

3. The net daily vehicular traffic increase on local arteries and streets in the project vicinity would be about 5% for the highest forseeable development density. A substantial portion of this traffic increase would occur at other than existing peak traffic periods and the increment at the peak hour would be 3%. Some localized congestion could occur for brief periods during the evening hours.

C. Short-Term Effects During Construction

1. Relocation of businesses would cause short-term inconveniences and disruptions (to owners, employees, and customers) until new facilities can be located and occupied.

2. The immediate effect of business relocation would be to reduce the number of vacant properties in the surrounding area. The short-term effect of the joint development project might be to increase the vacancy rate in the surrounding area as businesses choose to relocate to the Baltimore Gardens project site. The project's long-term effect would be to reduce the vacancy rate in the surrounding area by providing a catalyst for the upgrading and revitalization of the entire retail district.

3. Temporary traffic congestion, detours, and pedestrian inconveniences would occur along the perimeter of the project site. Coordination of project construction with transit system construction would minimize the additional impacts of the project itself.

4. Although construction specifications will be prepared to keep adverse impacts to a minimum, increased noise, vibrations, and air pollutant emissions (primarily dust particles) can be anticipated. Project construction impacts will be perceptually diminished by virtue of their coincidence with transit system construction.

5. The visual environment would be adversely affected by construction equipment, fencing, haul vehicles, and other elements of construction activity.

6. Some temporary losses in retail sales activity and disruptions of shopping patterns in stores adjacent to the site could occur.

4. Alternatives Considered:

A. A "No-Action" (Baseline, or present policies) alternative - the "no-action" alternative projects conditions anticipated within the proposed project site area, and the surrounding retail district, by 1985, should the proposed action not be taken.

B. A "Maximum Retention of Existing Structures" (Scheme A) alternative - the Scheme A alternative considers the physical and economic consequences and feasibility of retaining all existing structures along the street edges of the portion of the project site area proposed for joint public/private development.

C. A "Partial Retention of Existing Structures" (Scheme B) Alternative - the Scheme B alternative considers the physical feasibility and economic feasibility of retaining the large existing structures along the Howard Street edge of the portion of the project site area proposed for public/private development.

D. A sub-alternative under Scheme B, identified as "SchemeB-1", which considers retaining the building at 210-218 N. Howard St. (the Hutzler's South, or "Palace", Building) and incorporating it within the proposed development plan.

E. A "Medium Density New Development" (Schmem C) Alternative - the Scheme C alternative considers the minimum level of new development required for private development feasibility. This alternative consists of public open space, specialty retail, department store, entertainment and parking uses.

F. A "Higher Intensity New Development" (Scheme D) Alternative - the Scheme D alternative considers the highest level of development which could be accommodated on the project site, consistent with the City's overall development policies for the retail district. This alternative includes a higher intensity of new retail development, consideration of the future potential for significant office space or residential development, and off-site parking provisions.

5. Comments on the Draft Environmental Impact Statement were received from the following Federal, State, and local agencies and interested organizations and individuals.

U.S. Department of Agriculture
Soil Conservation Service
U.S. Department of the Interior
U.S. Environmental Protection Agency
U.S. Department of Transportation
Office of the Secretary
Maryland Department of Economic and Community Development
Maryland Historical Trust
Maryland Department of Health and Mental Hygiene
Environmental Health Administration
Maryland Department of State Planning
Maryland Department of Transportation
Mass Transit Administration
Regional Planning Council

American Institute of Architects - Baltimore Chapter
Baltimore Heritage, Inc.
Charles Center - Inner Harbor Management
Downtown Merchants Association
Greater Baltimore Committee
Hecht's
Hochshild-Kohn & Company
Hutzler's
Lexington Market Authority
Maryland Historical Trust - Baltimore City Committee
Mt. Royal Improvement Association
Retail District Project Area Committee
Retail Merchants Association
Stewart's

William Boucher
Councilwoman Mary Pat Clarke
Albert Dellospedale
Bill Devine
Ted Egorin
David Gann
Martyn Greig
Robert Herman
George Hess
Councilman Nathan Irby
Julius Levi
Bernard Manekin
Alvin Manger
Jordan Max
Kathleen Monaghan
Jack Pearlstone
Larry Reich
Douglas Schafer
Harry Schafer
Jeffrey Sekulow
Gloria Serio
Charles Soistman
Constantine Spero

Copies of the Final Environmental Impact Statement have been sent to all agencies, organizations, and individuals who commented on the Draft and to all those on the distribution list for the Draft EIS.

6. Circulation of the Draft Environmental Impact Statement began on Friday, August 25, 1978. The Final Environmental Impact Statement is being made available in June 1979.

REVIEW AND FINDINGS

This Environmental Impact Statement represents a detailed statement, as required by Section 14 of the Urban Mass Transportation Act of 1964, as amended, and Section 102 (2)(c) of the National Environmental Policy Act of 1969, as amended, on -

(1) the environmental impact of the proposed project.

(2) adverse environmental effects which cannot be avoided should the proposal be implemented,

(3) alternatives to the proposed project,

(4) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and

(5) which may be involved in the proposed project should it be implemented.

Based on the information contained in this Environmental Impact Statement and on consideration of the written and oral comments offered on the draft document, the Urban Mass Transportation Administration has determined in accordance with Section 14 of the Act that-

(1) adequate opportunity was afforded for the presentation of views by all parties with a significant economic, social, or environmental interest, and fair consideration has been given to the preservation and enhancement of the environment and to the interest of the community in which the proposed project is located, and

(2) all reasonable steps have been taken to minimize adverse environmental effects of the proposed project and where adverse environmental effects remain, there exists no feasible and prudent alternative to avoid or mitigate such effects.

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1.0 REGIONAL PERSPECTIVE

The Baltimore Standard Metropolitan Statistical Area (SMSA) consists of the City of Baltimore and its five surrounding counties. The SMSA consists of approximately 2,200 square miles of land area, of which 309 square miles are considered urbanized. The City of Baltimore includes almost 80 square miles of land area. It is the economic center of its region in terms of population, employment, cultural, and educational institutions, and commercial and industrial activity. The City is among the ten largest in the nation.

1.1 Major Land Use Patterns

Within the Baltimore SMSA some 22% of the total land area is developed. Within the City of Baltimore 91% of the land acreage is developed.

In terms of land use densities, the urban nature of Baltimore City becomes even more pronounced. The average residential density in the City is 35 persons per residential acre (vs. 9.9 for the remainder of the SMSA); the commercial employment density is 70 employees per commercially zoned acre (vs. 13 for the remainder of the SMSA); and the industrial density is 18 employees per acre in the industrial land use category (vs. 10 for the remainder of the SMSA).

The Northwest Corridor in which the Section A rapid transit line is located experienced a 23% increase in residential population density in the period between 1960 and 1970 (compared to a slight City-Wide decrease). It now exhibits essentially the same overall density as the remainder of the City, but with wide variations within specific neighborhoods. The outer segment of the Corridor consists primarily of low and medium density residential land uses, with scattered institutional, open space, and strip commercial/industrial areas along major arterials. The inner portion of the Corridor is characterized by high and medium density (older) residential uses which change to office, retail, commercial, and loft/manufacturing uses within the core of the CBD. Detailed land use patterns within the Corridor area are discussed in Chapter 2.

1.2 Socio-Economic Characteristics

Population Growth

The 1970 census data indicated a population of 2.07 million for the Baltimore SMSA, of whom 905,800 (43.7%) lived in the City of Baltimore. The Baltimore urbanized area contained 1.56 million persons (or 75.4% of the total SMSA population). The population growth rate in the SMSA during the 1960-1970 period was 14.8%; the City itself experienced a population decline of 3.5% during the decade. Most of the out-migration from the City resulted in population shifts to the rapidly growing suburban areas. The growth rate experienced by the five-county area surrounding the City during this period was 34.7%

As a result of active neighborhood revitalization efforts by the City, it is anticipated that the recent (1960-1974) rate of out-migration from Baltimore City to the surrounding suburbs will abate somewhat between 1977 and 1982 (to about 1,400 per year) and drop still further (to 800 per year) over the 1982-87 period. The forecast is that the City's population will become stabilized at a level of 823,000 by 1987. The major growth in the SMSA will continue to be focused in Anne Arundel, Baltimore, Howard and Harford counties.

Employment

Total employment in the SMSA grew by some 12.6% between 1970 and 1977, reaching a level of 906,500. Approximately 95% of the SMSA employment is located within the Baltimore urbanized area. This increase has not been steady, but reflects annual growth in employment ranging from 10,000 per year (1972-74) to 19,000 (in 1970-72). Forecasts call for an expansion of SMSA employemnt to a level of 992,500 by 1982 and to 1,076,500 by 1987. The City's share of SMSA employment has declined slightly from just over 50% in 1970 to a level slightly below this value in 1976. Of the new jobs created in the SMSA since 1970, by far the greatest number (75%) have been located outside the City. Current data indicates that government (22.2%), wholesale and retail trade (22.7%) and manufacturing (18.9%) represent the major groupings of the regional employment base.

Retail Activity

Between 1970 and 1976 the total number of businesses in the City of Baltimore declined by some 25% (from 12,167 to 9,118).

When adjusted to reflect population shifts, the decline, measured in terms of the number of establishments per 1,000 population, declined by 20% (from 13.4 to 10.7 per thousand). Within the SMSA the ratio of establishments to population has remained essentially stable (at between 10.4 and 12.4 per thousand in each County). The sole exception to this stability is Carroll County which showed an 18% increase in population, but a 35% decline in the number of business establishments, thereby reducing its ratio from 23.1 per thousand to 12.7 per thousand.

In terms of overall sales volume and per capita retail expenditures the City has also experienced a decline in its share of SMSA retail sales. It is still the dominant retail core of the region, however, and receives a net inflow of consumer dollars (i.e., the proportion of SMSA sales volume attained in the City is greater than its share of SMSA residents). Between 1970 and 1976, City-wide retail sales on taxable items grew by 21% to a volume of $2.04 billion. This 1976 volume represents 40.6% of the comparable SMSA level (a decline from the City's 50.1% share of 1970 retail trade).

1.3 Regional Transportation

The Baltimore Metropolitan region is served by both a regional public (bus) transit system and a growing interstate and regional highway network. In addition, the metropolitan area is served by the Baltimore-Washington International Airport, located five miles southwest of the City, which provides trunk, regional and commuter air service, and air cargo and general aviation facilities. It is also served by the Northeast Corridor Amtrak passenger rail system. Direct service is provided to Washington, D.C. and points to the south and west and to major northeastern cities such as Philadelphia, New York, Providence, Boston and Montreal.

Regional Highway Network

The existing regional highway network is shown in Figure 1-1. This system, which has radial, circumferential and grid components, focuses on the central City and contains some 1,400 center-line miles of roadway. Of this total the mix can be classified as follows: 15% freeways, 60% major arterials and 25% other regionally oriented roadways. A number of factors,

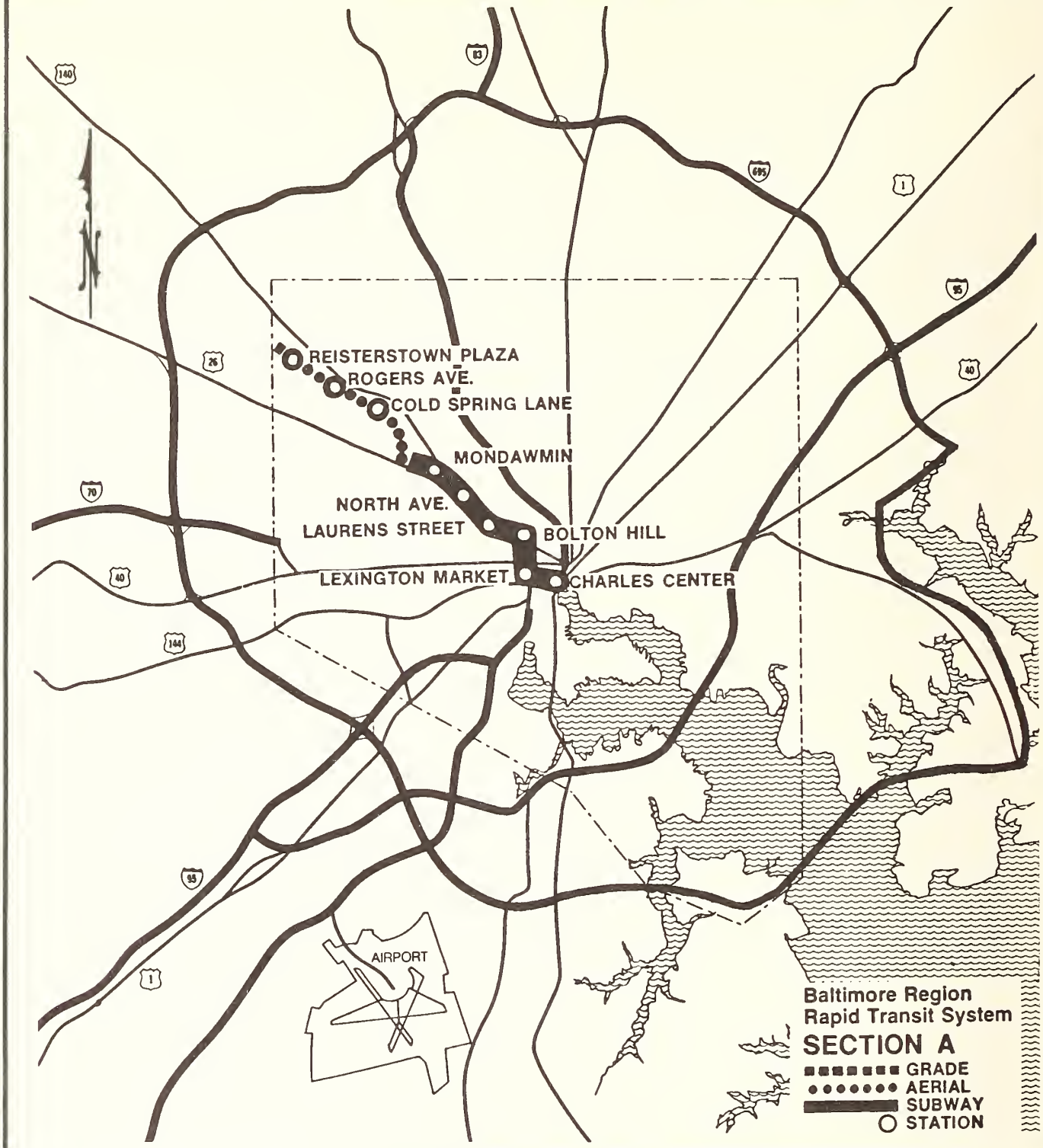

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FIGURE 1-1

PHASE I/SECTION A
BALTIMORE REGION RAPID
TRANSIT SYSTEM &
REGIONAL HIGHWAYS

MAJOR ARTERIAL
INTERSTATE HIGHWAY

SOURCE: DEPT. OF PLANNING

including increases in automobile ownership and the number of households greater than population increases, and rapid suburban growth (in which distances to work are longer and less transit is available) have combined to increase the annual rate of regional vehicle-miles-of-travel (VMT). The latest available VMT data covers the period through 1974 and shows a 6% increase between 1970 and 1974.

Regional Transit System

The MTA currently operates an extensive regional bus network and is in the process of constructing the first phase of a rail rapid transit system. The bus network is composed of regular and express service on some 41 routes, providing radial, circumferential and cross-town service into and through the City and its immediate suburbs. In addition, the bus system includes a downtown shuttle serving the major CBD activity centers.

As of 1976, the MTA operated a fleet of more than 1,000 buses over some 950 route-miles. The annual ridership was in excess of 94 million passengers and the system provided some 26 million passenger miles of travel. The bus route structure will undergo major revisions throughout the Northwest Corridor once the Phase I/Section A Baltimore Region Rapid Transit line is operational.

The first phase of the rapid transit system is scheduled to begin operation in 1982. The Phase I/Section A line consists of an eight-mile heavy rail rapid transit line running from Charles Center in the CBD to Reisterstown Road Plaza in the extreme northwest corner of the City. At present, construction is underway on all line segments of the Section A system and on each of its nine station projects. The route alignment and station locations of the Section A project are shown in Figure 1-1. Estimates of peak period ridership anticipated at the nine station locations along this line are shown in Table 1-A. A detailed discussion of passenger access and mode of arrival is included in Chapter 5 of this statement. The MTA's projections for Section A ridership indicate that 82,900 patrons will use the system on an average weekday and that annual patronage will exceed 21.5 million passengers. Combined public transit (bus and rail) usage is anticipated to be 138.5 million passengers annually, once the Section A facilities are in operation.

Table I - A

Section A - Passenger Forecast

Station	Line Volume P.M. Peak Both Directions	Station Boardings Daily	A.M. Peak	P.M. Peak
Reisterstown Plaza		9,900	5,400	1,200
	6,600			
Rogers Avenue		4,700	2,500	700
	8,900			
Cold Spring Lane		3,400	1,900	400
	10,500			
Mondawmin		5,200	2,500	1,000
	13,400			
North Avenue		5,400	2,800	800
	15,700			
Laurens Street		3,700	1,900	500
	17,300			
Bolton Hill		14,600	1,300	8,500
	20,000			
Lexington Market		14,200	3,000	6,400
	14,500			
Charles Center		21,700	6,300	8,200

Source: Maryland Mass Transit Administration

The remainder of the Phase I rail transit system, as presently planned, consists of a four-mile extension in a northwesterly direction to Owings Mills in Baltimore County.

Comprehensive Transit Station Area Planning Activities

The City of Baltimore has been actively engaged in planning for comprehensive transit joint development since the inception of rapid transit project planning in 1967. The earliest feasibility studies conducted by the Maryland Mass Transit Administration for the Phase I line anticipated extensive future development activity at each station site. The State of Maryland and the Urban Mass Transportation Administration provided funds to the City in 1974 for a comprehensive study of development and access issues and opportunities. This study, known as the Transit Station Area Development and Access Study (TSADAS), has included: market investigations, traffic analysis, station area/community reconnaissance and station design review.

The TSADAS study has examined both the community and regional context within which each transit station will operate. Its analysis was then broadened to the overall Phase I/Section A corridor. Market estimates of land use demand for new development at station sites have been tested against land use information, competitve development trends and City policy.

Extensive documentation of existing conditions in each station area has been prepared by the TSADAS study group in the Baltimore City Planning Department, and is available for inspection. This documentation includes quantifiable data related to land use, building conditions, and demographics, and evaluations of problems and opportunities as perceived by community residents, business people and institutional administrators. A continuing community participation program is a major basis for this program.

2.0 STUDY AREA DESCRIPTION

2.1 Definition of Study Area Boundaries

The proposed Lexington Market Station Joint Development project is located in the retail area of the City's Central Business District (CBD). The assessment of potential project impacts requires definition of study and impact areas at varying distances around the site, depending on the nature of the specific impacts being investigated (e.g. construction noise and disruption impact a smaller geographic area than induced development or traffic effects). On the basis of functional and jurisdictional boundaries, previous planning studies and data compatibility, the following study area definitions are used in this Statement (See Figure 2-1).

Baltimore CBD (MetroCenter) - The overall Central Business District of Baltimore City, this is the study area definition for traffic analysis, consideration of future induced (or "secondary") development, and regional market and air quality impacts evaluation. The boundaries shown conform to Regional Planning District #118 and cover six census tracts; many of the City's long range planning studies have been focused on this area.

The Core Study Area - A sub-section of CBD West, with a radius of some 1,000 feet from the perimeter of the proposed project site, defines the area within which most potential direct environmental impacts are anticipated. This 24 square block area includes small portions of three census tracts and four transportation zones. This core area also includes the Retail District Urban Renewal Area but extends two block beyond its northern boundary to provide a more uniform geographic coverage, for environmental impact study purposes, around the transit station and proposed project site area.

The following study area description focuses primarily on the core study area, with selective descriptions and comparisons to the Baltimore MetroCenter area as appropriate.

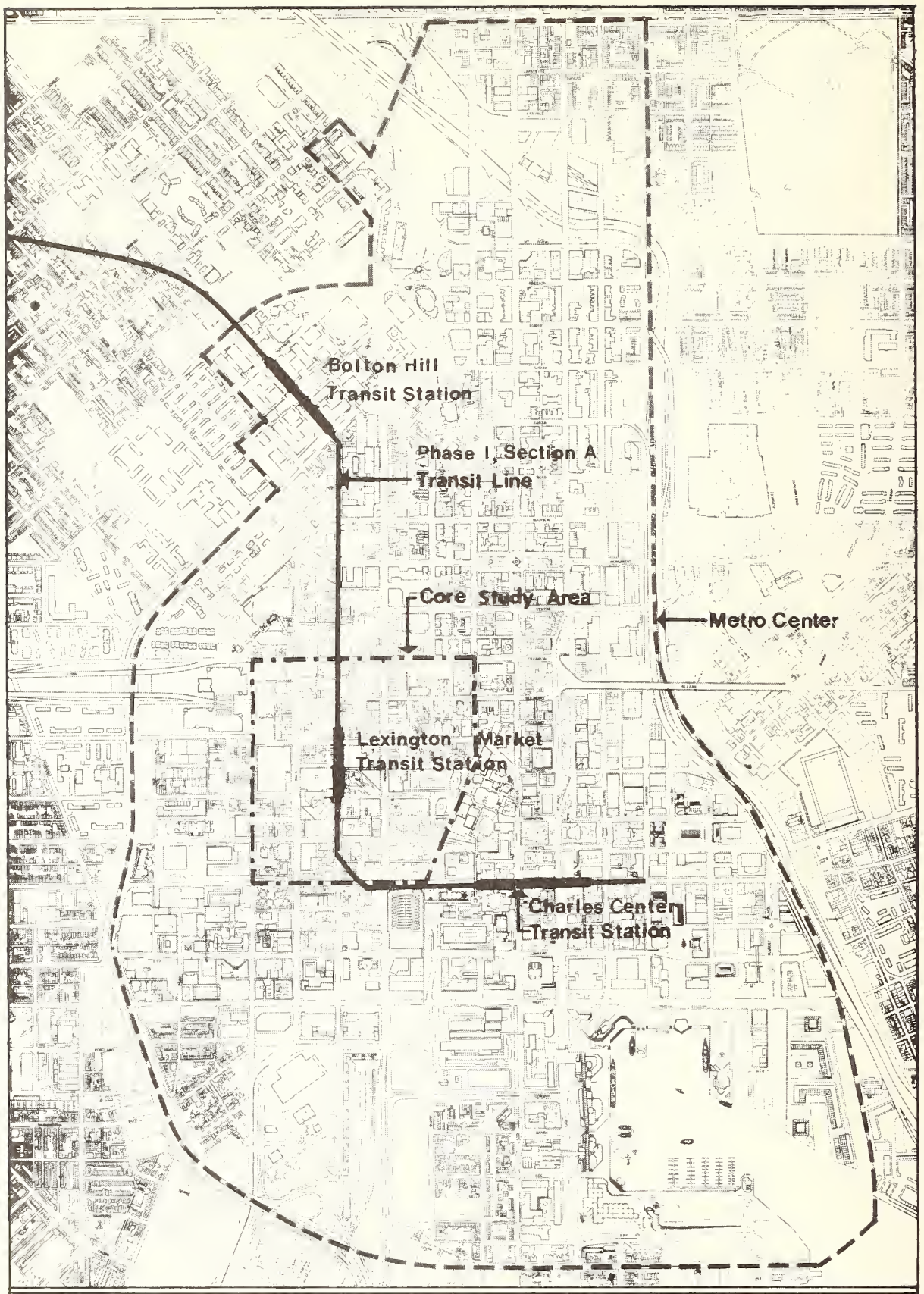

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FIGURE 2-1
STUDY AREA BOUNDARIES

SOURCE: DEPT. OF PLANNING

2.2 Land Use and Urban Framework

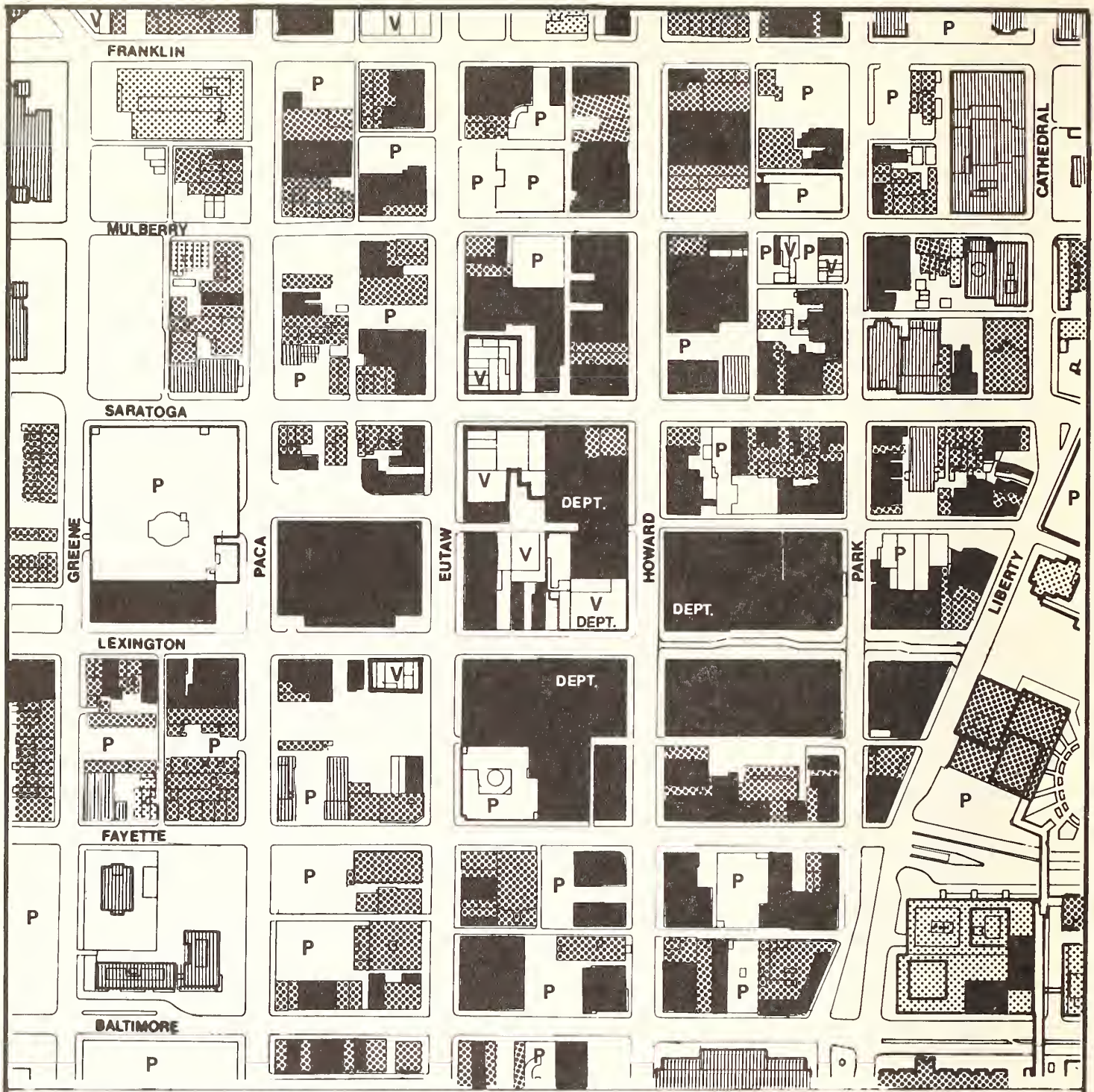
The MetroCenter area includes some 1.25 square miles of land area and is composed of a variety of commercial, institutional, retail, industrial, residential and public land uses; less than 6% of the total acreage is devoted to residential usage. Specific land use patterns and urban environmental patterns within the core area and its immediate periphery are discussed below.

Retail

Major retail activity within the Baltimore MetroCenter area is centered at the intersection of Howard and Lexington Streets (See Figure 2-2). This entire area is included within the core study area. The intersection of these streets has been the traditional focal point for downtown retailing since the middle of the 19th century. The area surrounding this intersection is known as the "100% corner" because it is the site of the City's four remaining major department stores and a large group of variety stores. Supporting this area of intense merchandising, smaller scale and specialty retailing spreads out from the "100% corner" over the whole study area, with lesser density, and higher vacancy rates, toward the periphery.

One block to the West of the Howard and Lexington intersection is the Lexington Market, one of the most important retailing institutions in the area. This is a regional retailing attraction, which provides a colorful and abundant variety of foodstuffs, and is one of the world's largest fresh food centers. Adjacent to the Market is the Lexington Market Garage, a large but functionally inefficient parking structure. Both the Market and the Market Garage are located in a physically deteriorating retail environment.

The Baltimore Retail District has experienced significant changes in physical environment in recent years as its market share of metropolitan retail sales has declined. Indication of the changes are a general deterioration in the standards and quality of merchandising and retailing; an abesence of any significant new development; a lack of maintenance to the exisiting building fabric; and an increase in the number of



ENVIRONMENTAL IMPACT STATEMENT
CITY OF BALTIMORE:
THE LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT

FIGURE 2-2 **STUDY AREA GENERALIZED LAND USE**

- Retail
- Commercial
- Residential
- Public / Institutional
- V — Vacant Building(s)
- P — Parking

SOURCE: DEPT. OF PLANNING

vacant buildings and vacant lots, (with attendant security hazards real and perceived, and potential for an increase in crime).

Lexington Street, which was partially converted to a pedestrian and vehicular mall in 1974 (between Liberty and Howard Streets), still fulfills its historic role as the principal East-West retailing corridor, connecting Charles Center on the East to the Lexington Market, via the 100% retail corner.

The completed portions of the Lexington Mall represent the only significant pedestrian amenity in the Retail District. Potential CBD shoppers face traffic congestion, pollution, and the lack of amentities in using CBD retail facilities.

Financial & Office

Small scale office facilities are spread fairly evenly throughout the study area, usually with commercial banks occupying the first floor levels. One such concentration is located along Eutaw Street between Baltimore and Marion Streets, comprised of branches of Maryland National Bank, the Eutaw Savings Bank and First National Bank. A pattern worth noting is the general location of financial institutions within each block. There are at least a dozen such structures occupying corner lots. There is currently only one large speculative office building in the study area, the Civic Plaza Building (c. 1911).

Towards the perimeter of the area, the upper stories of some older warehouse type buildings have been converted to office use for the administration of street level businesses or services. These tend to be substandard accommodations. In the northeast corner of the study area several fine old row houses have been converted into professional and law offices.

Housing

Residential uses in the study area are relatively few.

In the mid-19th century, most existing residential uses were absorbed by the spread of the retail district.

Evidence of this pattern is present in those buildings which survived this land-use conversion.

There are, however, residential clusters on the periphery of the study area which represent the current limits of potentially strong residential development spreading from the Seton Hill and Mt. Vernon neighborhoods to the North. The most dynamic example of this activity is the Orchard/Biddle Urban Renewal Area to the northwest where both new construction and housing rehabilitation are taking place.

An area which has been designated for future residential recycling is the Loft District in the southern part of the Core Study Area. This portion of the study area contains warehouse type buildings which are potential candidates for recycling into low and moderate income, and market-rate, loft-type housing. The Loft District is immediately south and east of the University of Maryland downtown campus. Currently underutilized or vacant, these fine warehouse structures are the proud remains of Baltimore's once burgeoning garment industry.

Activity Centers

Within and adjacent to the core impact area there are several discernible activity centers and neighborhoods which differ in character from the central retail core. The nature and location of these sites is shown in Figure 2-3.

The Charles Center complex, incorporating high rise office structures, residential towers (400 units), retail shops and open plazas with pedestrian skywalks, borders immediately on the east side of the study area, and exerts considerable influence upon it. The Center is a successful, well maintained, high quality major development of new buildings whose uses provide a source of potential customers for the central retail area. The site of the Charles Center has to some extent broken the traditional connection between the central retail district and the financial and governmental districts. It has put a complex of new office buildings between them, but at the same time, has created an activity center at the midpoint of the linkage.

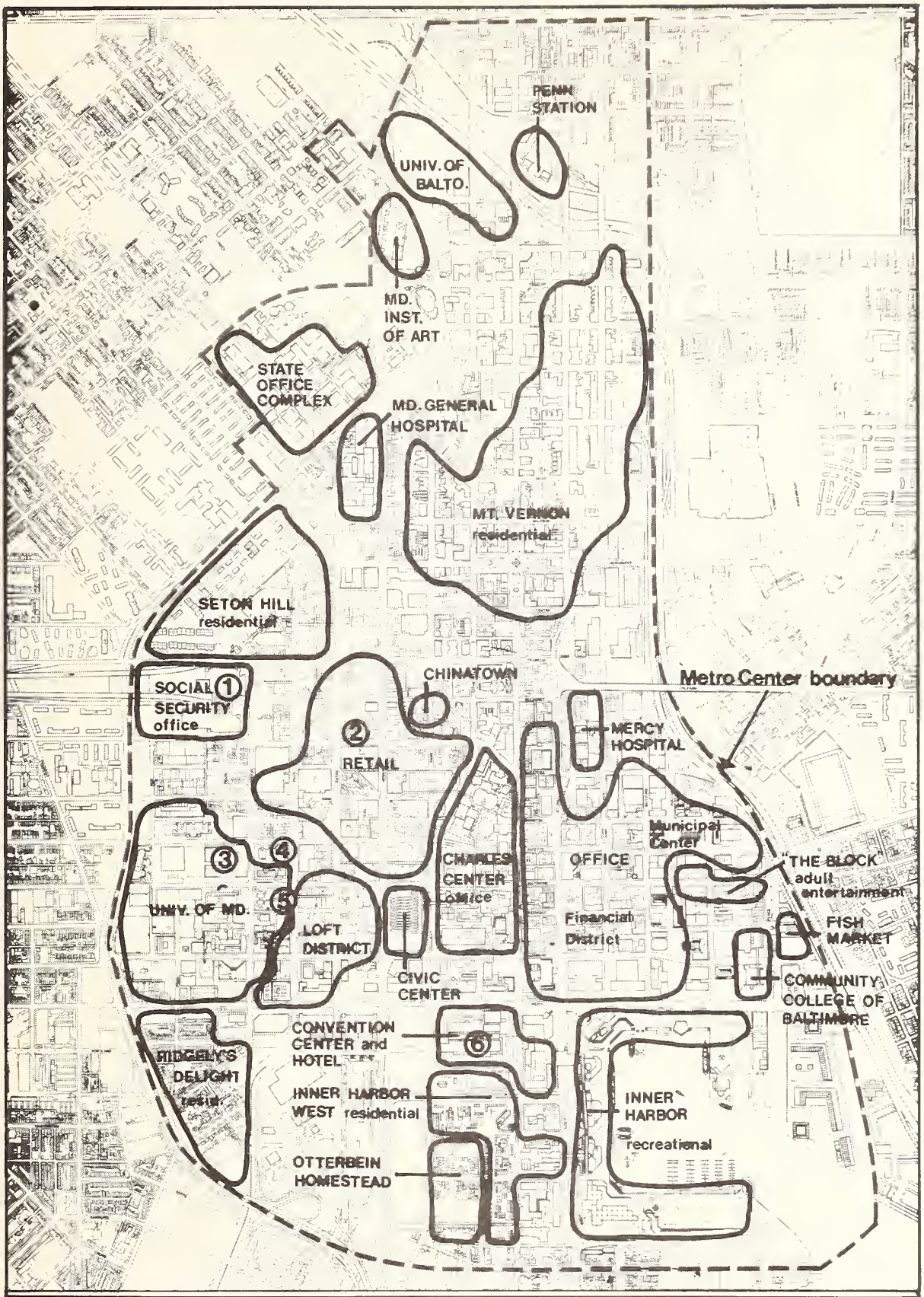


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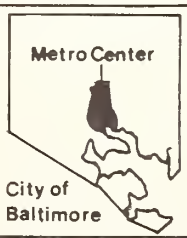
FIGURE 2-3

ACTIVITY ZONES in Metro Center

① COMMITTED NEW CONSTRUCTION

SOURCE: DEPT. OF PLANNING



The University of Maryland's professional schools are located at or adjacent to the southwest corner of the study area, and the Baltimore Civic Center borders immediately on the southeast corner of the area.

Committed New Construction

In addition to the Lexington Market rapid transit station (described in later sections of this Statement), there are a number of significant, committed new development projects within and adjacent to the core study area that are relevant to this project. These are indicated in Figure 2-3 and are keyed to the six summary descriptions provided below.

(1) Social Security Complex - currently under construction and scheduled for initial occupancy by 1979. This is a large federal office facility with a first stage of some 600,000 net square feet and 5,200 employees. Additional expansion is projected. This facility will provide a major new source of potential retail shoppers in the district.

(2) MTA Operations Control Center - to be constructed as part of the Section A rapid transit system. It will be operational by 1981 and will serve as the command, control, and communications center for the system.

(3) Veterans Administration Hospital - to be completed in the 1980-85 time period. A 580-bed facility which will constitute both a local activity center and a source of potential retail customers.

(4) University of Maryland, Law Library - to be completed by 1980, this site will provide a 63,000 square foot addition to the existing University campus, in close proximity to the Lexington Market and the Howard and Lexington Street intersection.

(5) University of Maryland, School of Social Work - to be completed by 1985 as part of the campus expansion

program, at the corner of Redwood and Paca Streets.

(6) Convention Center - to be completed in March of 1979. It will contain 100,000 square feet of exhibition space and 45,000 square feet of meeting rooms and auditoriums, located between Sharp Street and Charles Street, along the south side of Pratt, in the Inner Harbor Area.

Physical Design and Environmental Problems and Constraints

The major urban and environmental deficiencies in and around the retail district range from inadequate "park" like space to poor pedestrian connections between activity centers. Most of these concerns are set forth in Figure 2-4 and can be divided into three general categories:

Poor Utilization of Good Structures - This concern stems from the underutilization of upper floors, deferred maintenance of structures, and from the neglect of street level facades. A lack of cohesiveness in the retail center has dissipated the demand for upper floor space while an insensitivity to the pedestrian environment has brought about a number of "blank" facades along the sidewalks. Both of these elements have tended to lessen the quality of the urban environment.

Lack of Public Space - With the exception of the two block Lexington Street Mall, there are virtually no public park like spaces. The lack of this public amenity has been a deterrent to encouraging increased pedestrian activity in this part of the City. In addition, this deficiency has meant that there is no central focal point which will give the retail district distinction, continuity or orientation. The stores in the district appear to exist without a significant sense of cohesiveness.

Pedestrian Access - The grade separated walkways from Charles Center are incomplete and do not facilitate pedestrian access to the retail district. The Lexington Street Mall, while providing one of the few urban amenities in the area, falls

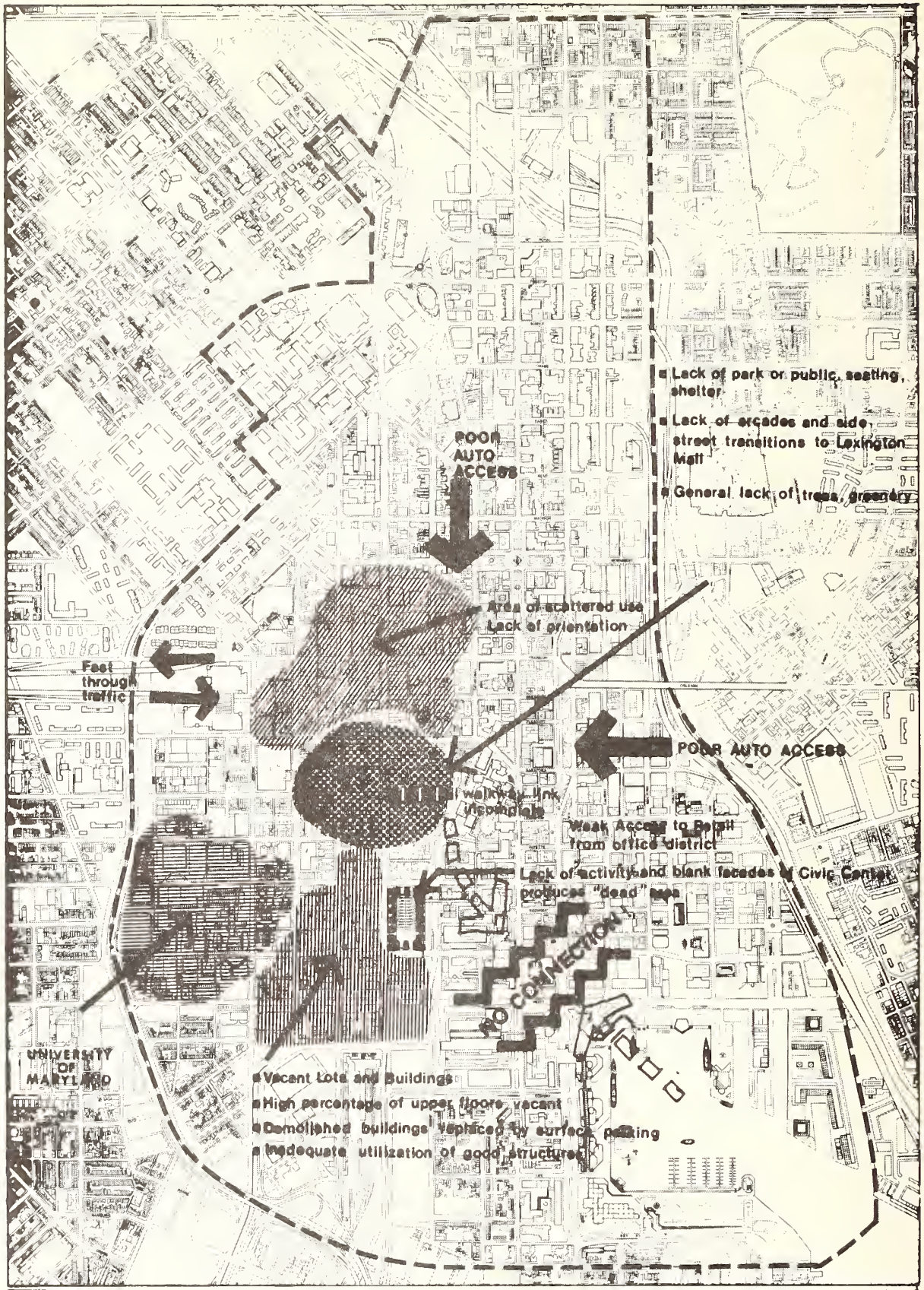


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FIGURE 2-4

PHYSICAL PROBLEMS

SOURCE: DEPT. OF PLANNING

short of providing a complete connection. Although plans call for the extension of the Mall, it currently serves only the two blocks between Liberty and Howard Streets.

General Isolation - Due to the relative growth and redevelopment of different sectors of the downtown area, the retail district has become increasingly isolated from other activity centers.

Controls and Master Plans

Official development controls and master plans affecting the study area consist of the following:

Zoning

The study area is subject to the Zoning Ordinances of the City of Baltimore and is classified almost entirely as a Central Business or Commercial District. The district and sub-district boundaries are shown on Figure 2-5. These classifications are defined as follows:

> B-4 is the designation for the Central Business District and provides for a great variety of uses. These include large retail stores, offices, and related activities characteristic of the major business streets of the downtown area and serving the entire metropolitan region. The district is divided into two sub-districts for purposes of bulk regulation. B-4-2 designates the higher permissable density with a floor area ratio not to exceed 14.0.

> B-5 constitutes the Central Commercial District and is designed primarily to provide those uses and activities in the CBD which are generally associated with and near the functions permitted in the B-4 District. A B-5-1 sub-district permits a maximum floor area ratio of 8.0 and the comparable number for a B-5-2 sub-district is 14.0.

In both of these Districts, Business Planned Developments (including residential) are permitted on parcels of two or more acres. The zoning ordinance does not require that any off-street parking spaces be provided in conjuction with retailing commercial uses in Districts B-4 or B-5. Office uses in these Districts require one space for each 2,000 square feet of floor area in excess of 50,000 square feet.

Retail District Urban Renewal Ordinance (1977)

Legislation designating the Retail District as an urban renewal area and authorizing public acquisition and redevelopment of the project site was approved by the Mayor and City Council of Baltimore on November 16, 1977, after extensive public hearings. The boundaries of this designated area are shown on Figure 2-5. They include the central portions of the core study area (between Greene and Liberty Streets and Saratoga and Fayette Streets).

The primary objective of this ordinance is to enable coordinated public and private revitalization of the retail district and the implementation of the joint development project at the Lexington Market station site. Specifically, the ordinance authorizes acquisition of the parcels required for redevelopment of the project site, outlines disposition procedures for the sale or lease of project land, and requires that all plans for new development, exterior rehabilitation or demolition throughout the urban renewal area be reviewed and approved by the City.

The Retail District urban renewal ordinance also provides that merchants displaced from the proposed project site area by project activities be offered a "right of first refusal" to purchase or lease space in new retail facilities developed for sale or lease on the project site.

The permitted uses designated in the the ordinance for Area #1 include: (1) retail (60,000-220,000 sq. ft.); (2) residential (200 units); (3) office (ancillary); (4) parking (only contiguous extension of parking in Area #2); and (5) pedestrian circulation (minimum of 25,000).

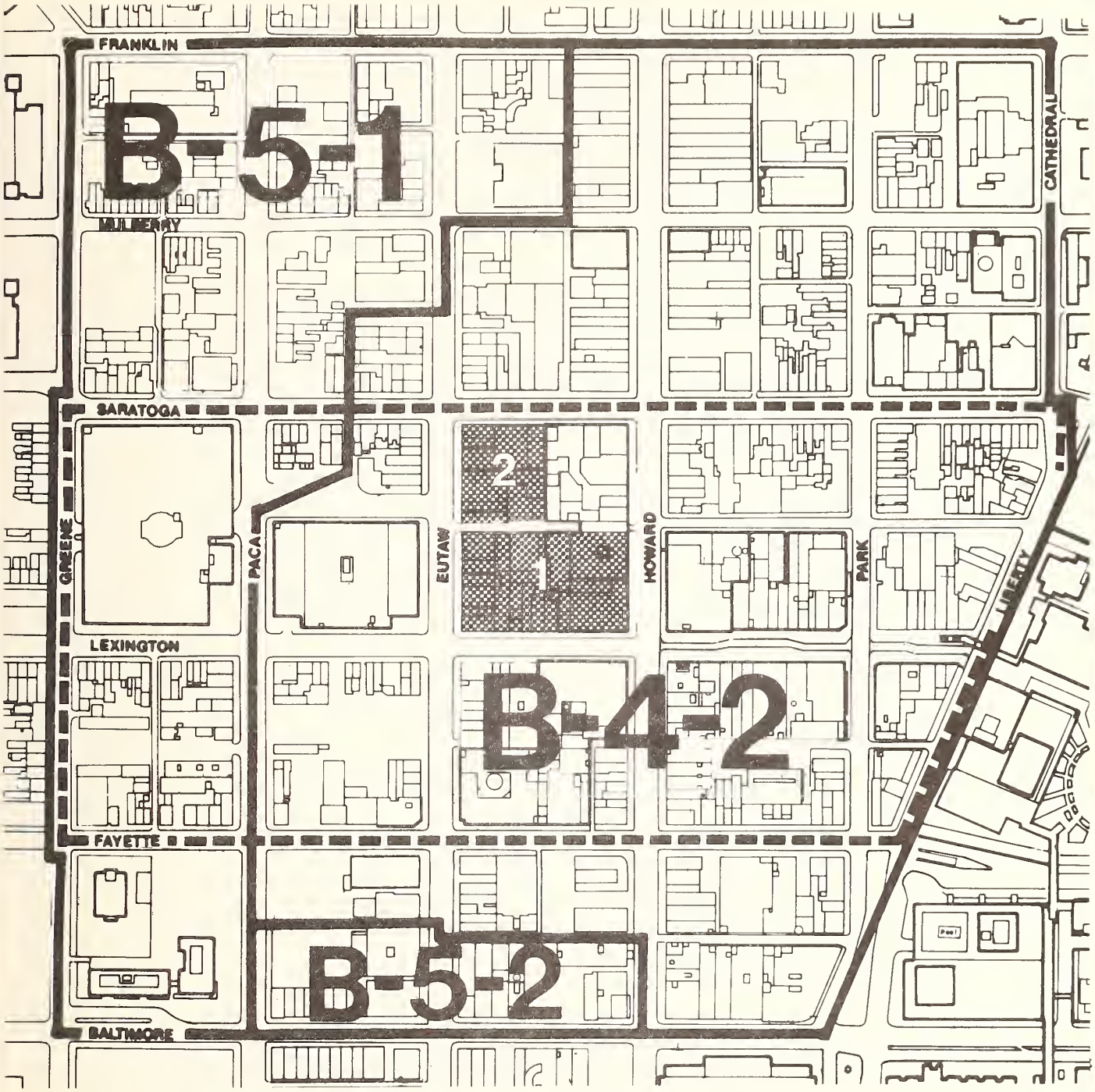

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FIGURE 2-5

RETAIL DISTRICT URBAN RENEWAL AREA & EXISTING ZONING

- RETAIL DISTRICT URBAN RENEWAL AREA
- ZONING USE DISTRICT
- DESIGNATED DEVELOPMENT AREAS

SOURCE: DEPT. OF PLANNING

The permitted office or required pedestrian circulation uses are identical for Area #2. In the case of residential and retail uses, the maximum permissable development (i.e. 250 units residential and 160,000 sq. ft. retail) exceeds Area #1. The major difference in permitted uses between the two development areas is in parking. Between 400-800 parking spaces are allowed in Area #2. The Retail District Urban Renewal Plan and Ordinance is available for inspection.

MetroCenter and Retail District Master Plans

The 1976 Baltimore Development Program indicates that the strengthening of MetroCenter's role as a major regional retail trade center is a primary objective of the City's Comprehensive Plan and Capital Improvement Program. A master plan for the future development of the retail district was prepared in 1976 and has received the endorsement of both the City and the Greater Baltimore Committee. This plan, which will provide the framework for implementing proposed future development in the retail district, is described in detail in Chapter 3 of this Statement.

2.3 Socio-Economic Characteristics

Resident Population and Housing

As noted above, residential land use in MetroCenter is very limited. The total 1970 resident population in the six census tracts of the MetroCenter area was 16,635, of which approximately 80% reside in Seton Hill, Mount Vernon and the Loft District. This represents less than 2% of the City's population and is a 25% decline from the 1960 population.

The decline during the past decade was widespread, with the only cluster of new growth the Charles Center apartment complex (400 units). Recent (1975) MetroCenter population estimates by the Regional Planning Council (RPC) indicate a static situation since 1970. The baseline forecasts by the RPC call for the MetroCenter population to grow at an average annual rate of 3-4% between 1975 and 1995, primarily due to substantial new housing development in the Inner Harbor Area.

In terms of racial mix in the MetroCenter, white residents accounted for 59% of the 1970 population. The comparable proportion in 1960 was 51%, indicating that the overall decrease in residents was concentrated more heavily among the black population. This was due primarily to the displacement within the predominantly black neighborhoods in the southwestern, western and northwestern portions of MetroCenter, resulting from highway construction during the 1960's.

While the demographic characteristics of MetroCenter generally reflect the Citywide norms, the district is composed of three quite disparate areas (See Table 2-A). The southern portion (below Pratt Street) of the MetroCenter area contains a racially-balanced residential population.

The western part of MetroCenter (west of Howard Street) is predominantly black and low-income, while the eastern segment is composed primarily of older, moderate-income apartment dwellers, with few children, and a high proportion of single-person households. The distinctions among these MetroCenter areas are illustrated by the comparison of selected data in Table 2-A.

The core study area had a 1970 population of 698 residents none of whom resided within the project site. Since the boundaries of this core area cover small portions of three census tracts, the demographic data on area residents is limited to those available on a census block basis.

This information is included in Table 2-A and indicates that the area's population contains a high proportion of elderly and childless residents who occupy older apartments. The rental rates are substantially lower than the City median and many of these dwelling units are located above ground floor retail space or in converted older hotels.

Estimates of 1975 population in the core area (prepared by the RPC) reflect no measurable changes during the 1970-75 period. The RPC has prepared long range growth forecasts of regional population changes including MetroCenter. These planning district growth forecasts, however, are not viewed as applicable for a locale as small as the core study area. The population changes in this area will be a direct function of specific

Table 2-A - Selected Characteristics of Study Area Residents (1970 Census)

Study Area Segment	Baltimore City	MetroCenter South	MetroCenter West	MetroCenter East/North	Core Impact Area
% Under 18	34	33	43	6	12
% Over 62	13	17	20	23	35
% Black	46	50	82	9	27
Median Yrs Schooling	10.0	8.4	8.4	12.3	N/A
% Households Below Poverty	18	37	53	14	N/A
Ratio of Income to City Median	1.00	.53	.31	.77	N/A
Median Household Size	2.5	2.1	2.6	1.3	2.2
% Owner Occupancy	42	16	4	6	8
Rate of Rent to City Median	1.00	.68	.67	1.19	.78
% Single Family	61	61	33	6	21
% in Structures w/50 + units	5	2	34	39	N/A
% Pre-1939	60	99	60	63	N/A
% Post 1965	5	-	0.4	25	-
% in Same Residences 5 + Years	56	67	52	40	N/A

Source: U.S. Department Commerce 1970 Census of Population and Housing compiled by Robert J. Harman & Associates

individual construction, renovation and/or recycling projects related to housing stock. These types of projects can not be accurately predicted by a regional growth distribution model. However, a number of planned or potential projects are being implemented which would have an positive impact on the size of the resident population in the core study area. These are noted in subsequent sections of this Statement.

Employment

Currently (1977) there are approximately 122,500 persons employed in the MetroCenter district of downtown Baltimore. This represents an increase of some 20% over the 1970 total district employment level of 101,700.

The major MetroCenter employment gains since 1970 have occurred in the government, business service and financial sectors. These increases offset declines in the manufacturing and retail sectors. Precise data are not available but it is estimated that the district's retail employment has dropped by some 1,500 - 2,000 jobs since 1970; over half of this is due to the closing of one of the major downtown department stores (Hochschild-Kohn) in mid-1977. Current estimates indicate that almost 50% of the MetroCenter employment base consists of office workers, with slightly less than 10% employed in retail sales.

Projections for long-term employment in MetroCenter[2] reflect a growth in total employment at an average annual rate of some 2% through 1982 and deceleration of that rate to just over 1%per year from 1982-87. These projections reflect a continuing increase in new office development and expansions of University and governmental facilities. The baseline forecast calls for an increasing share of office employment and a continuing net decline in MetroCenter retail employment.

Retail Trade

In 1975, the total retail trade volume in the MetroCenter area

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[2]Morton Hoffman and Company, MetroCenter Employment Forecast, Memo to the Greater Baltimore Committee, August 1977.

of the City of Baltimore was approximately $185.0 million. Approximately 37% or $68 million of this total was generated by department stores and 63% or $117 million was accounted for by general merchandise, apparel, accessory stores and funiture and equipment outlets. In comparison to the overall retail trade volume of the City, MetroCenter captured approximately 10% of the total.

Since 1960, both the City and the MetroCenter area have attracted a declining percentage of total SMSA retail trade activity. During this time period, the City's share of the regional trade market has declined from nearly 75% to approximately 40%. In comparison, MetroCenter has experienced a decline in its regional retail sales capture rate from a high of nearly 12% to its current level of only slightly more than 3.0%.

In absolute terms the retail trade activity in MetroCenter has declined at about 1% per year since 1958. Since that time, when total retail sales in MetroCenter were approximately $215 million, sales volumes (in absolute dollars) have fluctuated from a low of $175 million in 1963, to $208 million in 1972, to approximately $185 million in 1975.

This overall decline in retail trade is also evidenced by a reduction in the number of retail establishments. Since 1970, the number of retail businesses in the City of Baltimore has declined by over 3,000, which represents a 25% loss over the seven-year period. In MetroCenter, the most significant recent loss has been Hochschild-Kohn's downtown department store which closed in August, 1977. Currently there are about 500 retail establishments in MetroCenter which employ approximately 14% of the CBD work force. Nearly one-third of this total employment is represented by the four remaining department stores (Hutzlers, The Hecht Co., Stewart's and Brager-Gutman).

Within the core study area, these four remaining department stores represent approximately 45% or $44.6 million of the total estimated $110 million in current retail trade activity. Establishments located on the existing Lexington Mall have been moderately successful. The Lexington Market, with annual retail trade sales in excess of $5.0 million, is a focal point for pedestrians shopping in the Eutaw, Lexington and Howard Street area.

Since 1970, total retail trade sales volume within the project area has been declining when corrected for constant dollars. The closing of Hochschild-Kohn resulted in an immediate loss of $8-10 million in retail trade volume within the project area. Without future redevelopment within the project area the retail trade volume is projected to decline at an accelerating rate.

Employment in the core study area is currently estimated to be 7,900. This reflects a loss of over 1,200 jobs since 1970. Of this reduction, the closing of Hochschild-Kohn and the transfer of its office staff accounted for a loss of some 960 jobs in the immediate area. Further identifiable losses in the local employment base resulted from the acquisition of properties by the MTA for transit system and station construction. This amounted to some 80 jobs.

The latest available employment breakdown by employment sector for the study area was prepared in 1970. This compilation indicated that over 70% of the total 9,100 employees were involved in retail trade related activities. The complete employment distribution for the study area is shown in Table 2-B.

Table 2-B

Study Area Employment Distribution

Retail Trade	6,495	70.9%
Business & Personal Service	1,116	12.2%
Fire, Financial, Insurance, Real Estate	483	5.3%
Manufacturing	292	3.2%
Federal Government	340	3.7%
Local Government	109	1.2%
Transportation/Utilities	114	1.2%
TOTAL	9,161	100%

Source: 1970 "A+ Place" Employment Survey conducted by the Baltimore City Planning Department

Property Tax Base

In 1977 the total assessed property tax base of the MetroCenter Study Area was $290 million. The MetroCenter area currently represents 11.6% of the more than $2.5 billion assessed value of the property tax base of the City of Baltimore. The City assessment base has grown by 20% between 1970 and 1977.

Since 1970, the MetroCenter has represented a relatively stable 11% of the total City property tax base. The net gain in the tax assessments of MetroCenter properties, $73 million (33.6%), was primarily due to new office building construction. Existing properties that were not improved during the last several years have, with certain notable exceptions, (e.g. the major downtown department stores), increased in assessed value at a rate of approximately 5% per annum.

The property tax base of the core impact area is currently assessed at $32.7 million. This represents only a 7% increase since 1970 (compared to the 20% citywide increase over the period) when the area's total property tax base was $30.4 million. In contrast to MetroCenter, the core study area's share of the City's property tax base declined from 1.5% to 1.3%.

The nine parcels acquired by the Mass Transit Administration for the Operations Control Center represented only $264,000 in assessed value or .08% of the core impact area. On this basis the MTA's acquisition efforts have not represented a significant factor in the recent trends in the property tax base.

2.4 Transportation

Vehicular Traffic

The major access and distribution systems serving the study area are shown in Figure 2-6. As indicated, the retail district is bounded by a series of coupled one-way streets at its perimeter with an internal circulation pattern composed largely of two-way north-south streets and one-way east-west streets. Except for Liberty Street and the Mall segment of Lexington Street the street pattern forms a relatively even grid network.

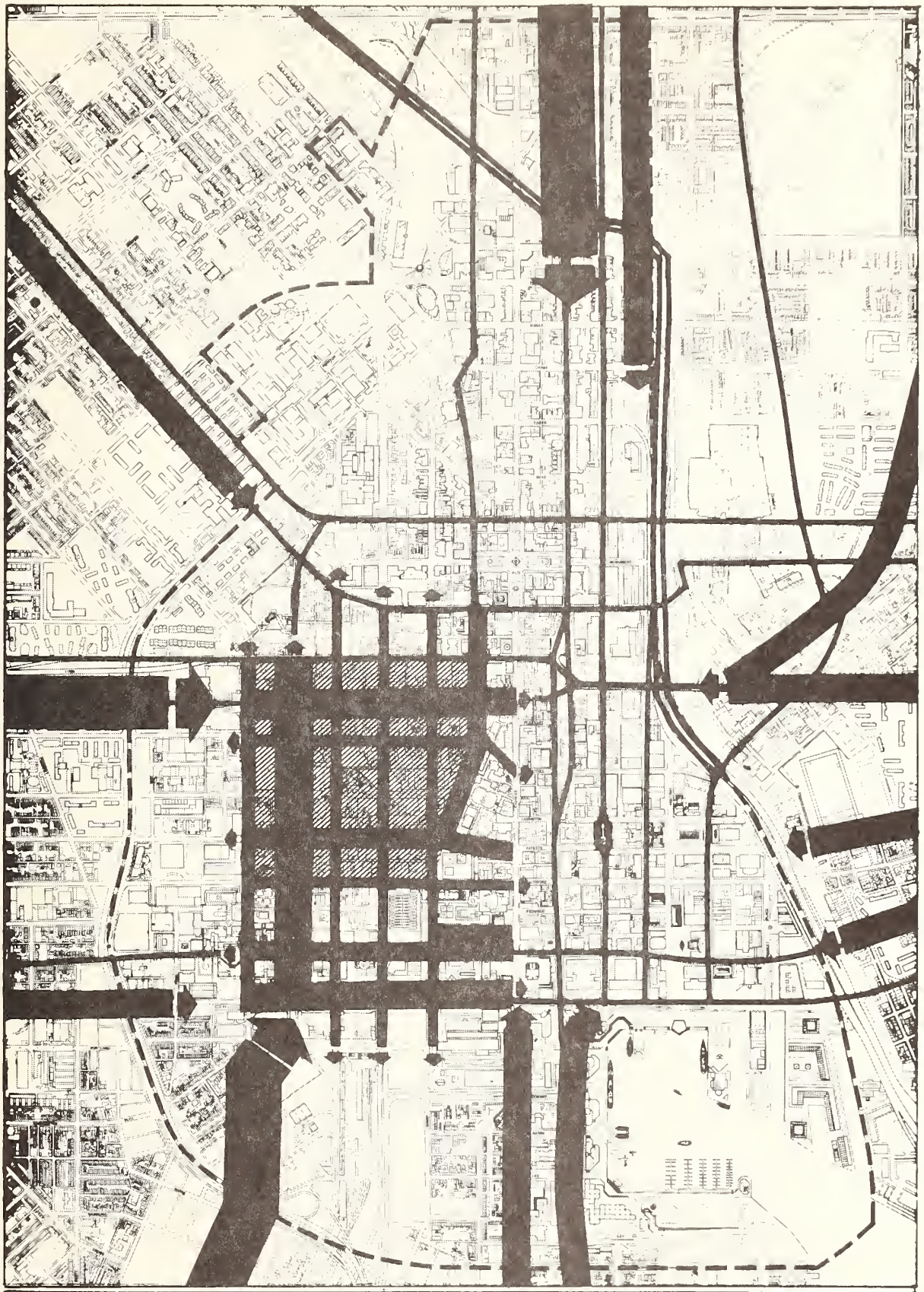

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FIGURE 2-6

AUTO ACCESS

Major Access Routes: over 20,000 vehicles/day inbound

Other Important Access Routes: 10,000-20,000 vehicles/day inbound

SOURCE: DEPT. OF PLANNING

As part of the data collection effort for this Statement, the Baltimore City Transit and Traffic Department undertook an extensive traffic counting program at key locations within and adjacent to the study area during August-September 1977. The average daily traffic (ADT) volumes derived from these counts indicate that the heaviest daily volumes in the study area are to be found on the north-south pair of Paca and Greene Streets and the east-west pair of Franklin and Mulberry Streets. The daily traffic volume moving through the study area cordon line is estimated at 180,200 vehicles. The peak traffic volume on each street is essentially proportional to its ADT volume (8-12%).

The overall peak period in the local network occurs between 4:30-5:30 p.m. but the peaks do not occur at the same times of the day for all streets.

Analysis of these peak volumes in terms of street and intersection capacities indicates that the network segment closest to saturation at any time of the day is Mulberry Street (eastbound from Greene Street) during the morning peak period. All other links and intersections are operating satisfactorily.

The general vehicle mix of traffic in the study area is estimated at 90-95% passenger cars and light duty vehicles and 5-10% buses or heavy duty trucks. In terms of vehicular travel speed within the study area, the distribution of vehicle miles of travel(VMT) by speed range is estimated to be:

M.P.H.	% OF VMT
0-9	10%
10-19	25%
20-29	60%
30-39	5%
40 or over	0%

Although not directly comparable, downtown traffic counts are available for prior years; it is possible to make overall estimates of recent traffic volume trends on the basis of cordon-line crossing data and regional traffic monitoring studies. While vehicular activity in the urbanized portion of the Baltimore SMSA increased in the 1970-75 time period (an annual average of 2.4% in VMT and 5% in cordon line crossings), traffic volume crossing the Baltimore City boundary remained essentially

unchanged (average gain of 0.1% per year). These findings reflect the relatively brisk development in the suburban areas outside the city.

In terms of vehicles crossing the CBD boundary, average daily traffic on weekdays decreased by some 0.6% per year over the five-year period. During that same time-frame, peak period traffic volumes grew at an average annual rate of 0.6%. This divergence in trends is indicative of a deterioration in off-peak downtown activities (i.e. shopping and personal business) as well as some strength in the downtown employment sector.

Public Transit

The core study area is currently served by an extensive bus network operated by the Mass Transit Administration (MTA). The study area is a major focal point of rider origins, destinations and transfers. Twenty-one (21) of the 35 routes operating in the Baltimore metropolitan area pass through the study area and some 90% of the almost 286,000 daily system riders are on routes which pass through this sector.[3] Howard Street, on the eastern edge of the project site area, is one of the major bus routes in the city.

In addition to its regional bus lines, the MTA also operates a "Downtowner" shuttle bus service within the CBD. This service, which connects the retail core, City Hall, Charles Center, and State Office complex as well as other major activity centers, runs on 10-20 minute headways at a cost of $.10 per trip.

Construction has begun on the Section A line's Lexington Market rapid transit station, which will serve this area. The station will lie beneath Eutaw Street between Lexington and Saratoga Streets. A mezzanine level will provide an underground pedestrian concourse linking the northeast and southeast entrances of the station. This is a further expansion of the present vehicle separated pedestrian walkway system of the central business district.

Ultimately four station public entrances are planned at Lexington Market: two at the north and two at the south end. (The southeast entrance is to be incorporated into the proposed joint development project). The MTA's breakdown of the expected ridership for this station is provided below:

Pedestrian: The dominant access mode, with about 80% of the total patronage walking between the station and their origin or destination.

Bus Transfer: Accounting for about 15% of the patronage, bus transfer is immediately adjacent to each entrance.

Kiss-n-Ride: Calculations show that the remaining 5% of the patronage will arrive or depart in automobiles.

Park-n-Ride: No requirement.

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[3] Ridership analysis by Maryland Department of Transportation, 1975.

Parking

In June of 1977, there was an inventory of approximately 46,300 existing parking spaces in the overall Metro Center Area.[4] Of these, approximately 38,300 spaces (82% of the total) were located in off-street facilities. The inventory includes approximately 42,900 long-term spaces. Within the Core Study Area, the June 1977 inventory totaled approximately 4,500 spaces, of which approximately 3,700 were in off-street structures. Approximately 95% of the spaces in the Core Study Area inventory, 4,200 spaces, are for long-term (3-4 hours or more) parking, with only 300 existing short-term spaces. During the 1977-80 period, demand for short-term parking within the study area has been projected to be 1,500 spaces per day, resulting in a current deficit of approximately 1,200 short-term spaces. The closing of Stewart's Department Store in January 1979 reduces 1979 short-term parking demand by 200 spaces, resulting in a 1979 short-term parking deficit of 1,000 spaces. This corresponds to an overall Metro Center area short-term parking deficit of 7,140 spaces in 1977; which is projected to increase to a deficit of 9,200 spaces by 1980. Seventy percent of the existing parking spaces in structures within the Core Study Area are considered functionally obsolete for short-term parking use, as these structures were designed with narrow ramps, aisles, and stalls; dense column spacing, minimal and obsolete lighting; and poor user orientation and constricted accessibility, based on the design standards for valet and attendant parking of an earlier era.

Within the overall Metro Center Area, the demand for additional long-term parking spaces was identified as approximately 900 spaces in 1977; by 1980, the deficit is projected to increase to 2,600 spaces.

Within the Core Study Area, a surplus of approximately 1,250 existing long-term spaces was identified in the 1977 inventory. However, approximately 70% of the existing inventory of 4,200 long-term spaces within the study area are located in parking structures which evidence a high degree of functional obsolescence, as they cannot be structurally adapted to public self-parking use. In addition, the downtown office complex of the Social Security Administration will open in the Fall of 1979 with 5,800 employees. This facility will have only 500 parking spaces. Its workforce is projected to generate an additional demand for 500 long-term spaces within the study area by 1980. The functional obsolescence of the existing structures and the opening of the Social Security facility is viewed as resulting in a balance between anticipated demand and effective supply during the 1979-1982 period.

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[4] The parking data in this section is based on the Baltimore Metro-Center Parking Study, Phase I Report Inventory and Demand Analysis, October, 1977 prepared by Joseph P. McGee and Associates, Inc. for the Baltimore City Planning Department and the Off-Street Parking Commission.

Pedestrian Movement Patterns & Volumes

A 1975 survey of pedestrian activity (by RTKL Associates, Inc.) indicated that 88% of the pedestrians in the retail district/Charles Center work in the downtown area. Travel between bus/parking and place of work accounts for about one-third of all pedestrian activity. Trips for eating and/or shopping account for an additional 40% of daytime activity, with a heavy concentration in the noon hours. One-half of all pedestrian trips cover distances of less than 700 feet (2 blocks) and only 10% are over distances greater than 2,500 feet.

Studies of noon-hour pedestrian activity in the downtown in 1968 and 1974/75 indicate little overall change in movement patterns or volumes within the retail district, but an appreciable increase along Lexington Street since the mall was opened. The heaviest concentrations of activity were found in the Lexington Street area, between Saratoga and Baltimore, and along Baltimore Street in the financial district. The predominant movements in the downtown core are in an east-west direction.

The noon-hour pedestrian count on Lexington Mall (1975) is in the range of 6,000, a volume which represents an increase of better than 25% over the same location prior to its conversion to a mall. Volumes on Saratoga and Fayette Streets (parallel to the mall) were each on the order of 1,200 (no significant departure from 1968 counts).

2.5 Utilities

Sanitary Sewer

The project site drains into the Mid-Town Level sanitary system tributary to the Eastern Avenue Pump Station. The sewage is then pumped from the area to the Back River Plant. Small local connection lines serve each building.

There are no capacity problems projected in the core study area. All collection systems leading to the pumping station have significant excess capacity. The pumping station capacity is approximately 70 MGD while flows to the facility are less than

40 MGD. It should be noted that about 3 MGD will be diverted from the station with the completion of southwest diversion.

Water Supply

Water is supplied to the Lexington Market Station area through the First Zone of service. No major water distribution lines cross the project site. There are no expected capacity problems in the First Zone.

Storm Drainage

The project area is predominantly impervious and this condition is not expected to change. The existing storm drainage system, located within and adjacent to the project site area has adequate capacity for both existing and projected site activities.

Steam Distribution System

The Baltimore Gas and Electric Company operates two steam generating plants serving the downtown Baltimore area. The capacities of these plants are:

Spring Gardens	515,000 lbs./hr.
Terminal Plant	475,000 lbs./hr.
TOTAL	990,000 lbs./hr.

Currently the plants are operating close to capacity during the winter. A small reserve exists for planned development in the Inner Harbor. Baltimroe City's pyrolysis plant, when completely operational (by 1980) will provide approximately 125,000 lbs./hr.

B G & E currently plans no expansion to their steam generating capacity. Any generating capacity additions would likely be coal fired. The utility's plans could be subject to change based on Federal energy policies and regulations. However, based on expected increases from the pyrolysis plant plus the fact that this project will in large part only replace an existing use, there are no expected capacity problems.

All steam lines are located in public rights-of-way. Extension of the Lexington Mall may require adjusting the location of the 10-inch and 4-inch lines in Lexington Street.

Specific utility adjustments and relocations are planned, within the project site area, as part of the proposed action. No increases in capacity are required.

2.6 Air Quality Conditions

Current Status of Maryland's Transportation Control Plan

The Transportation Control Plan (TCP), promulgated by EPA and the State of Maryland in 1973 for the Metropolitan Baltimore Interstate Air Quality Control Region, is based on the strategies proposed by the State of Maryland, which were augumented by sufficient additional control measures to permit the attainment of primary air quality standards for photochemical oxidants and carbon monoxide by May 31, 1977. In addition to the Federal Motor Vehicle Control Program (FMVCP), the principal control measures included in the Transportation Control Plan were as follows:

Inspection and maintenance

- An inspection and maintenance system, to ensure that the pollution control equipment on each registered automobile remains in suitable working order.

Retrofit strategies

- Vacuum spark advance discount (VSAD) retrofit devices on all pre-1968 model year light-duty vehicles
- Air/fuel retrofit of 1968-1971 light-duty and medium duty vehicles
- Catalytic retrofit of 1971-1975 light-duty and medium duty vehicles
- Air/fuel retrofit of all heavy-duty vehicles

Traffic flow improvements

Vehicle miles of travel (VMT) reduction measures, including exclusive bus lanes, carpool locator, bikeway program, parking restrictions, parking management.

Gasoline distribution limitations

The additional stationary source controls promulgated by Maryland on October 3, 1973 included controls on:

Industrial process heating

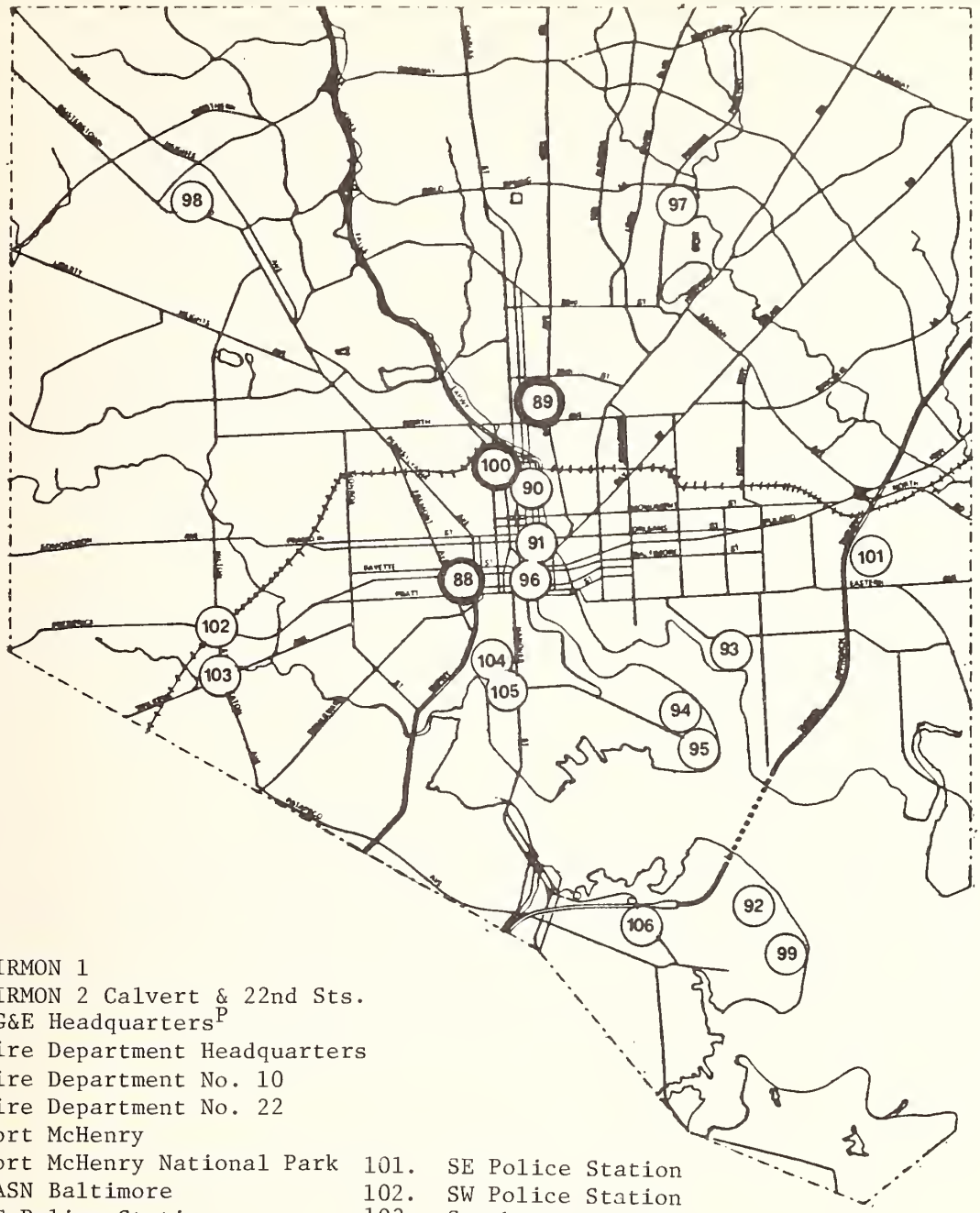
Solvent usage

Gasoline storage and handling

The TCP, as promulgated, was intended to provide the reduction in emissions and resultant air quality required to meet the carbon monoxide and photochemical oxidant standards. However, the State of Maryland and several major companies in the Baltimore area filed suit against EPA charging that EPA had not acted properly in promulgating some portions of the TCP. The Fourth Circuit U.S. Court of Appeals on September 19, 1976, set aside "as contrary to law" the provision of the plan which required establishment of an inspection and maintenance program, a retrofit program, and a bikeways program. In addition, the Employers Mass Transit Incentive Program was remanded to EPA for clarification. At the present time, this litigation is with the U.S. Supreme Court, and no decision has been rendered to date. Thus, the only currently active elements of the TCP are traffic flow improvements and the carpool locator program.

Air Monitoring Data - Current Conditions

Maryland is divided into six air quality control areas, corresponding to the six Federally designated Air Quality Control Regions of the State. Baltimore City is a part of the Metropolitan Baltimore Intrastate Air Quality Control Region, which also includes the counties of Anne Arundel, Baltimore, Carroll, Harford, and Howard. Figure 2-7 is a map of Baltimore which shows the location of air monitoring stations in the City. All sampling stations have been established at locations that reflect either general air quality, background levels of pollution, or where an elevated air pollution potential exists. Among the pollutants monitored are particulates, sulfur dioxide, nitrogen



88. AIRMON 1
89. AIRMON 2 Calvert & 22nd Sts.
90. BG&E Headquarters[P]
91. Fire Department Headquarters
92. Fire Department No. 10
93. Fire Department No. 22
94. Fort McHenry
95. Fort McHenry National Park
96. NASN Baltimore
97. NE Police Station
98. NW Police Station
99. Patapsco STP
100. 200 Read Street
101. SE Police Station
102. SW Police Station
103. Southwestern High
104. Spring Gardens BG&E[P]
105. Spring Gardens BAQNC
106. Sun & Chesapeake

[P]Privately owned stations

ENVIRONMENTAL IMPACT STATEMENT
CITY OF BALTIMORE:
THE LEXINGTON MARKET STATION
JOINT DEVELOPMENT PROJECT

FIGURE 2-7

AIR MONITORING SITE LOCATIONS

SOURCE: DEPT. OF PLANNING

dioxide, carbon monoxide, photochemical oxident (ozone), non-methane hydrocarbons, total hydrocarbons, fluorides, sulfates, lead, chromium and iron. Monitoring station AIRMON 1, operated by the State and located at Lombard and Penn Streets, is closest to the project site. Detailed city-wide measurements and data from this station for 1975 through the third quarter of 1978 (where available) are summarized below.

Carbon Monoxide

CO is monitored by nondispersive infrared as well as flame-ionization methods. Analysis of measured CO data indicates that elevated carbon monoxide levels exist at several locations in the Baltimore metropolitan area. The one-hour standard of 40 mg/m3 was not exceeded at any of the monitoring stations in Baltimore City during the years 1975, 1976, 1977, or in the first three quarters of 1978. The 8-hour standard of 10 mg/m3 was exceeded three times in each of the past three years in the project area, as indicated by the AIRMON 1 monitor . The maximum 8-hour average CO reading was 14 mg/m3 and occurred during the fourth quarter of 1976; the second highest was 12 mg/m3 and occurred twice during the first quarter of 1977.

Nitrogen Dioxide

Nitrogen dioxide levels in Baltimore are monitored continuously via the Saltzman and chemiluminescence methods. The annual average standard of 100 ug/m3 was not exceeded at any of the monitoring stations in Baltimore City during the 1975 - 1978 period. The 1977 annual average at AIRMON 1 ranged from 56 ug/m3 (Saltzman) to 47 ug/m3 (chemiluminescence), and the partial data available from 1978 (two quarters) indicate an average level of 38 ug/m3.

Non-Methane Hydrocarbons

Non-methane hydrocarbons are monitored by the flame-ionization method. Analysis of measured hydrocarbon levels indicates that high levels of hydrocarbons exist in Area III where measurements were taken during 1975 - 1978. The 1976 - 1978 measurements were all taken in Baltimore County, outside the City limits; no measurements were taken at any of the city monitoring stations. In 1977, the two County stations closest to the city reported 68 days (Towson site) and 180 days (Essex site) when the 6 a.m. - 9 a.m. average exceeded 160 ug/m3. The 3-hour standard of 160 ug/m3 for non-methane hydrocarbons was exceeded 25 times in Baltimore City during 1975.

Photochemical Oxidants

Photochemical oxidants, composed primarily of ozone, are not generally emitted directly into the atmosphere bur rather are the result of a complex chain of chemical reactions involving reactive hydrocarbons, nitrogen oxides, and sunlight. This pollutant is monitored continuously by the chemiluminescence method. Analysis of the data shows that high concentration of photochemical oxidants are observed during the months April through November. Highest concentrations are recorded during the summer months. Nearest the project area (at AIRMON), one-hour averages exceeded 160 ug/m3 on 28 days during 1976, on 31 days during 1977, and on 12 days during the first three quarters of 1978. The occurrences were all in the second and third quarters of the year (April to September).

Total Suspended Particulates (TSP)

Particulate concentrations result from many sources including fuel combustion, incineration, natural sources, and construction activities. Suspended particulates, resulting from motor vehicle activity, are created both directly in the form of brake shoe and tire wear and indirectly from reentrainment of road dust. The contribution from land vehicles excluding road dust entrainment is 14 percent of the total particulates emitted into the atmosphere in the metropolitan Baltimore region according to the 1973 National Emissions Report. Observations of TSP are not taken at AIRMON 1; the monitoring site closest to the project area is the Baltimore City Fire Department Headquarters (north of the project). Readings at that location indicate that the national primary air quality standard of 260 ug/m3 was not exceeded at any time during 1977 or the first three quarters of 1978. In 1977, the average reading was 78 ug/m3; the highest level was 172 ug/m3 and a level of 160 ug/m3 was exceeded on 2 days. The 1978 partial data indicated an average of 82 ug/m3 and a peak one-day reading of 221 ug/m3.

2.7 Noise

Overview and Definitions

In an active central business district such as the core study area, sound levels are generated by a variety of sources. The major sources in this case are traffic (especially trucks and buses), pedestrian and other street activity, and construction activity in the area (primarily MTA construction of the Lexington Market station).

In describing noise conditions, the sound intensity levels are presented in terms of A-weighted decibel scales (dBA). These are units of sound energy with the spectral components weighted to approximate the response characteristics of the human ear. The following psychophysical relationships indicate the nature of human response to changes in the noise environments.

Except in carefully controlled laboratory experiments, an increase of only one dB in A-weighted level cannot be perceived.

Outside of the laboratory, a three dB increase in A-weighted level is considered a just-noticeable difference.

A change in A-weighted level of at least five dB is required before any significant change in the noise level in a community would be expected.

A ten dB increase in A-weighted level is subjectively heard as approximately a doubling in loudness, independent of the existing noise level.

Table 2-C indicated the typical dBA levels associated with common indoor and outdoor activities and serves as a frame of reference for evaluation of existing conditions and potential impacts.

The A-weighted sound levels in the vicinity of streets or highways fluctuate from moment to moment as a function of passing traffic. These fluctuations constitute the time-varying character of the noise environment and require that a statistical index be introduced into the measurement process. A commonly accepted term used to account for such variations is the"L 10" noise level. This "L 10" level is defined as the sound intensity which is exceeded 10% of the time in any measurement period. All of the noise measurements and forecasts presented in this Statement are in terms of "L 10" levels.

Table 2-C

COMMON OUTDOOR NOISE LEVELS	NOISE LEVEL (dBA)	COMMON INDOOR NOISE LEVELS
	110	Rock Band
Jet Flyover at 1000 ft		
	100	Inside Subway Train (New York)
Gas Lawn Mower at 3 ft.		
Diesel Truck at 50 ft.	90	
		Food Blender at 3 ft.
Noisy Urban Daytime	80	Garbage Disposal at 3 ft. Shouting at 3 ft.
Gas Lawn Mower at 100 ft.		Vacuum Cleaner at 10 ft.
	70	
Commercial Area		Normal Speech at 3 ft.
	60	
		Large Business Office
Quiet Urban Daytime		Dishwasher, Next Room
	50	
Quiet Urban Nightime		
	40	Small Theatre, Large Conference Room (Background)
Quiet Suburban Nightime		
	30	
Quiet Rural Nighttime		Bedroom at Night Concert Hall (Background)
	20	
		Broadcast and Recording Studio
	10	
		Threshold of Hearing
	0	

Measurement Procedures and Criteria

Ambient noise measurements were taken at 15 locations in and around the core study area. These locations were selected on the basis of potential traffic-related noise impacts, existing land use and the sensitivity of receptors.

Readings were taken at 10-second intervals throughout the measurement period (using a General Radio model 1565-B noise meter).

Measurements were made on non-holiday weekdays during the period between 11:00 a.m. and 3:00 p.m.; the period during which other studies have shown the highest noise levels occur in the Baltimore central business district. A nighttime sample was taken on one corner of the project site to measure existing ambient conditions at the time of significant activity generated by the proposed facilities. Data collection was suspended during periods of rain or when wind velocity exceeded 15 m.p.h. since these conitions can interfere with or distort meter readings.

The number of readings taken at each location was determined on the basis of the statistical procedures employed by the Federal Highway Administration. Under this procedure, the size of the measurement sample is a function of the variance in the distribution of readings. After every 50 data points the accumulated data are examined to determine the error limits corresponding to a 95% confidence interval. Readings are taken until the error falls within a range of $\pm$ 3dBA. Thus, the number of readings at each location is sufficient to assure a .95 probability that the "true" noise level at that site is within 3dBA of the determined value.

Measured Noise Levels

The location, time, and date of the noise measurements, the "L 10" level for that site and the upper and lower error limits are shown below in Table 2-D.

Table 2-D

Measurements of Existing Noise Levels in the Study Area and Surrounding Locations

Measurement Locations	Date	Time	"L 10"	Error Limits
1. Preston Gardens St Paul & Saratoga Sts	Tues Oct 18	12:20 p.m.	73	+1 -3
2. Old St. Paul's Church Charles & Saratoga	Tues Nov 1	12:30 p.m.	73	+3 -3
3. Charles Center Plaza North of Fayette St	Tues Oct 25	12:30 p.m.	73	+3 -3
4. Hopkins Plaza	Tues Oct 25	1:05 p.m.	63	+1 -3
5. Liberty & Clay	Tues Oct 18	2:10 p.m.	73	+3 -1
6. St. Alphonsus Saratoga & Park Ave	Tues Oct 18	12:55 p.m.	73	+3 -3
7. Enoch Pratt Free Library Cathedral Street	Thur Oct 20	2:45 p.m.	75	-3 -3
8. Clay & Park	Tues	2:35 p.m.	71	-3 -3
9. Lexington Mall Midway between Park & Howard	Fri Oct 21	2:40 p.m.	67	+1 -1
10. Howard & Lexington	Thur Oct 20	2:10 p.m.	79	+1 -3
11. Howard & Clay	Tues Nov 1	1:30 p.m.	75	+3 -3
12. Eutaw & Clay	Tues Nov 1	2:10 p.m.	71	+3 -1
13. Westminster Presbyterian Church	Fri Mar 7	12:50 p.m.	71	+3 -3
14. Davidge Hall Greene & Lombard	Fri Mar 7	11:40 a.m.	75	+1 -3
15. Howard & Saratoga	Mon Feb 27	9:00 p.m.	75	+3 -3

Source: Interstate Division for Baltimore City

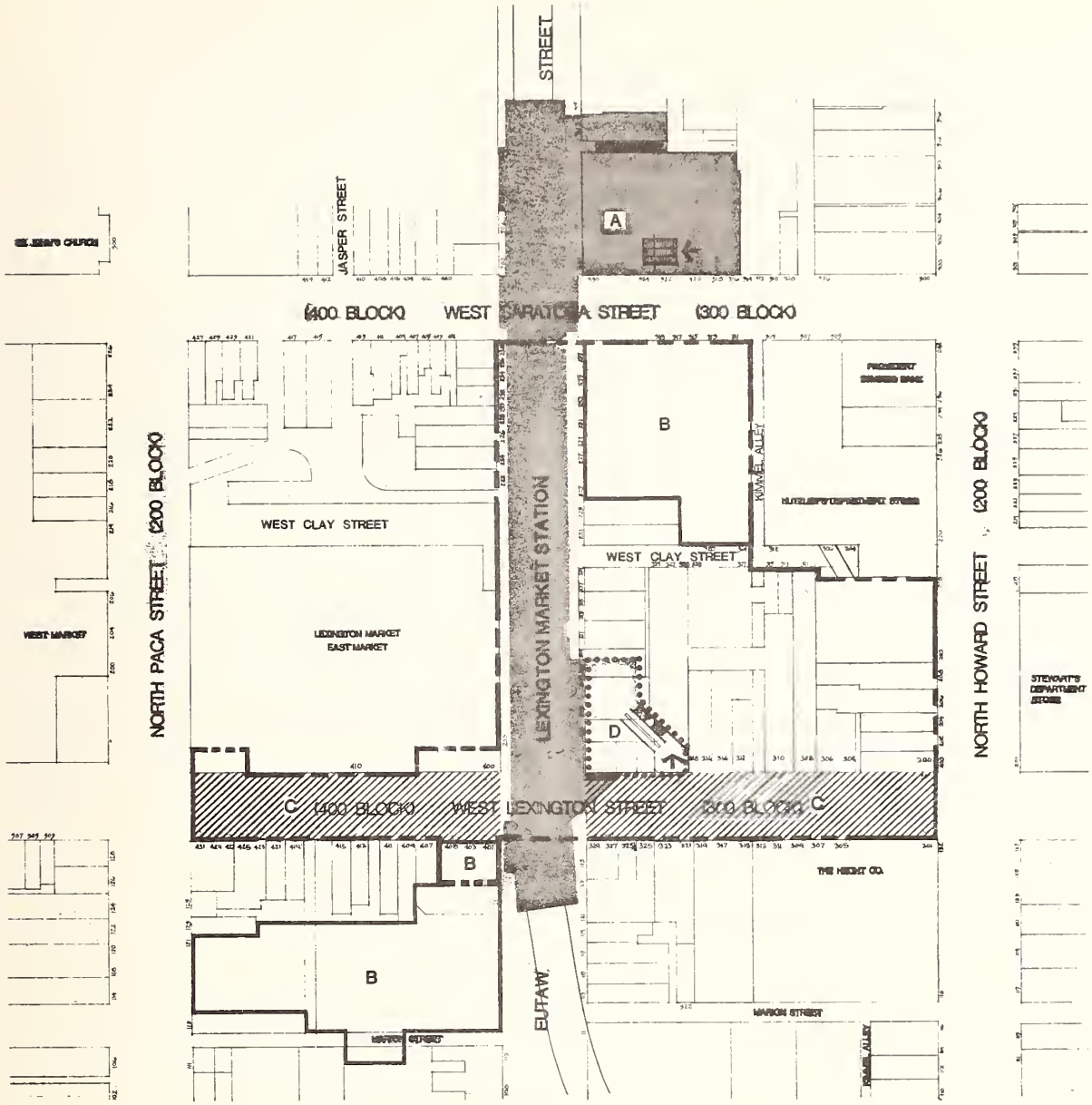
The data shows a high of 79 dBA at Howard and Lexington Streets and a low of 63 dBA in Hopkins Plaza. The high level at Howard and Lexington Street is the result of the combined truck, bus and pedestrian noise. The lower noise level at Hopkins Plaza is due to its location away from busy streets and the shielding effect of the large buildings which surround it. Overall, the measured levels are typical of what might be expected in a heavily urbanized activity center.

2.8 Physical Description of The Project Site Area and Environs

The proposed project site area is located at the center of the Core Study **Area** between the Howard and Lexington Streets "100% corner" of the downtown retail district and the Lexington Market Authority facilities west of Eutaw Street. It includes the construction site of the Lexington Market rapid transit station, in the 200 block of North Eutaw Street.

The project site contains approximately 4.0 acres, or 175,000 square feet, of land area (See Figure 2-**8**). As illustrated in Figure 2-**5**, approximately 103,000 square feet, or 2.4 acres, of land area within the site is proposed for joint public/private development, in accordance with the designation of "Development Area #1" and "Development Area #2" as redevelopment and disposition parcels by the Retail District Urban Renewal Plan and Ordinance. Approximately 50% of the land within the project site area is publicly owned, consisting of existing public rights-of-way, several properties acquired by the City, and properties acquired and cleared by the Maryland Mass Transit Administration (all properties in the portion of the project site area bounded by Eutaw Street, Saratoga Street, Kimmel Alley, and Clay Street, with the exception of 221 and 223 North Eutaw Street) for temporary use as a contractor's work and storage area during transit system construction.

The Maryland Mass Transit Administration began work on the Lexington Market rapid transit station in the Spring of 1978. The station box is located beneath the bed of North Eutaw Street from a point slightly south of the intersection of North Eutaw and West Lexington Streets to a point 175 feet north of the intersection of North Eutaw and West Saratoga Streets. Work on the station structural contract, which includes the Operations Control Center and the station's northeast entrance , is scheduled to be completed in mid 1981. A follow-up finish contract, which will include architectural finishes, mechanical and electrical work, and sidewalk/plaza paving and landscaping, will be let in September, 1980 with completion scheduled for November, 1981.



PROJECT SITE AREA AND ENVIRONS

BALTIMORE GARDENS : THE LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT
CITY OF BALTIMORE

FIGURE 2-8

MARYLAND STATE DEPARTMENT OF TRANSPORTATION /
MASS TRANSIT ADMINISTRATION PHASE 1/
SECTION A BALTIMORE REGION RAPID TRANSIT SYSTEM :
LEXINGTON MARKET STATION AND TUNNELS

A. Northeast Entrance Complex & Operations Control Center
B. Contractors Storage & Work Areas for M.T.A. Construction
C. Lexington Mall Extension Area
——— — — ——— Project Site Boundary
D. Proposed Southeast Entrance Plaza for the Lexington Market Station

The MTA has acquired or leased three groups of property directly adjacent to the station construction site, and has demolished the buildings on those sites. Only the land acquired for the Operations Control Center and for the station's northeast entrance (Figure 2-8 Site a) will be retained by the MTA. The parcel of land at 401-405 West Lexington Street is proposed to be permanently reserved for the future development of the southwest public entrance to the Lexington Market Station.

The project site area includes the northwest, southwest, and southeast quadrants of City Block 596 (City Block 596, as defined by the Baltimore Survey, is bounded by Eutaw Street, Saratoga Street, Howard Street, and Lexington Street), the public right-of-way of West Lexington Street between Howard and Paca Streets, the public right-of-way of North Eutaw Street between Lexington and Saratoga Streets, and the parcel of land at 401 - 405 West Lexington Street.

The lowest existing grade elevation within the area is at the Howard and Lexington Street intersection, at Elevation 64.75' above Mean Low Tide. This point is also the lowest point along Howard Street between Franklin and Fayette Streets. The grade elevation at the intersection of Eutaw and Lexington Streets is Elevation 84.2' and at the intersection of Eutaw and Saratoga Streets is 88.8'. The highest grade elevation within the site area is at the intersection of Lexington and Paca Streets, at Elevation 100.0'.

3.0 IDENTIFICATION AND EVALUATION OF ALTERNATIVES

3.1 Overview

The City of Baltimore's Lexington Market Station Joint Development Project for the proposed project site area has evolved from two decades of urban design studies and revitalization and redevelopment planning for Baltimore's downtown retail district; from the comprehensive Retail District Revitalization Study undertaken by the City of Baltimore, the Greater Baltimore Committee, and the Retail Merchants Association of Baltimore beginning in 1974; and from the planning, design, and development program for the Phase I/Section A Baltimore Region Rapid Transit System conducted by the Mass Transit Administration of the Maryland Department of Transportation.

Five (5) development alternatives and one (1) sub-alternative have been prepared and evaluated for the proposed action, including a "No-Action" alternative. Significant prior urban design and development plans for the retail district have been identified and described in this chapter, in order to outline the historical planning process which has resulted in the development of the project alternatives. The remainder of the chapter then describes the general criteria employed in developing the alternatives, and provides a detailed description of each.

3.2 Historical Review of the Planning Process

Although the downtown retail district surrounding the site of the Lexington Market Rapid Transit Station has been the subject of planning and revitalization studies since 1959, it has experienced relatively little new investment or development in the post-war period.

The Lexington Market East Building and the Lexington Market Annex and Parking Garage were constructed in the 1950's. The Baltimore Civic Center (a civic auditorium and sports arena), which is located at the southeastern corner of the retail district, was constructed as an adjunct of the Charles Center redevelopment project in 1964. The first sections of the Lexington Street Mall, between Liberty and Howard Streets, were constructed in 1974.

During this period, the major department stores surrounding the Howard and Lexington Street intersection made varying degrees of investment in interior renovations. The Hecht Parkade, a major new parking structure, was constructed by the Hecht Company at the corner of Fayette and Eutaw Streets in 1965. The only additional significant private investment in the area since the 1950's has been the construction of several smaller branch banking facilities along North Howard and North Eutaw Streets.

A number of design and development concepts were prepared for the retail district during the past two decades. While the initial studies were concerned with the entire retail district, the decision by the Mass Transit Administration to locate the Lexington Market Rapid Transit Station beneath the bed of North Eutaw Street, with entrances planned for Saratoga/Eutaw Street and Lexington/Eutaw Street, focused attention on the block adjacent to and east of the station site. In tracing the evolution of the current joint development proposal, five development concepts which included the Lexington Market Station area, were determined to be the most significant.

The five prior development concepts described in Section 3.3 below include:

(1) the 1959 Plan for the Central Business District of Baltimore, prepared by the Planning Council of the Greater Baltimore Committee;

(2) Joint Development Concepts prepared for the Lexington Market Rapid Transit Station site as part of the 1968 Preliminary Engineering and Feasibility Studies for the Baltimore Region Rapid Transit System, prepared for the Regional Planning Council and the Mass Transit Steering Committee by Daniel, Mann, Johnson, and Mendenhall and Kaiser Engineers;

(3) Concepts for a Eutaw Street Retail Arcade, Lexington Street Mini-Park, and Extension of the Lexington Street Mall which were developed as part of the 1975 Pedestrian Circulation Study for Downtown Baltimore, prepared for the City of Baltimore by RTKL Associates;

(4) The "Lexington Square" urban design concept developed as part of the 1976 Plan for Lexington Center, prepared for the Greater Baltimore Committee and the Retail District Study Executive Committee by the firm of Wallace, Mc Harg, Roberts and Todd; and

(5) Urban design and development concepts prepared for the retail district, between

1975 and 1977, by Mr. Cyril Paumier, in association with the Baltimore City Committee of the Maryland Historical Trust.

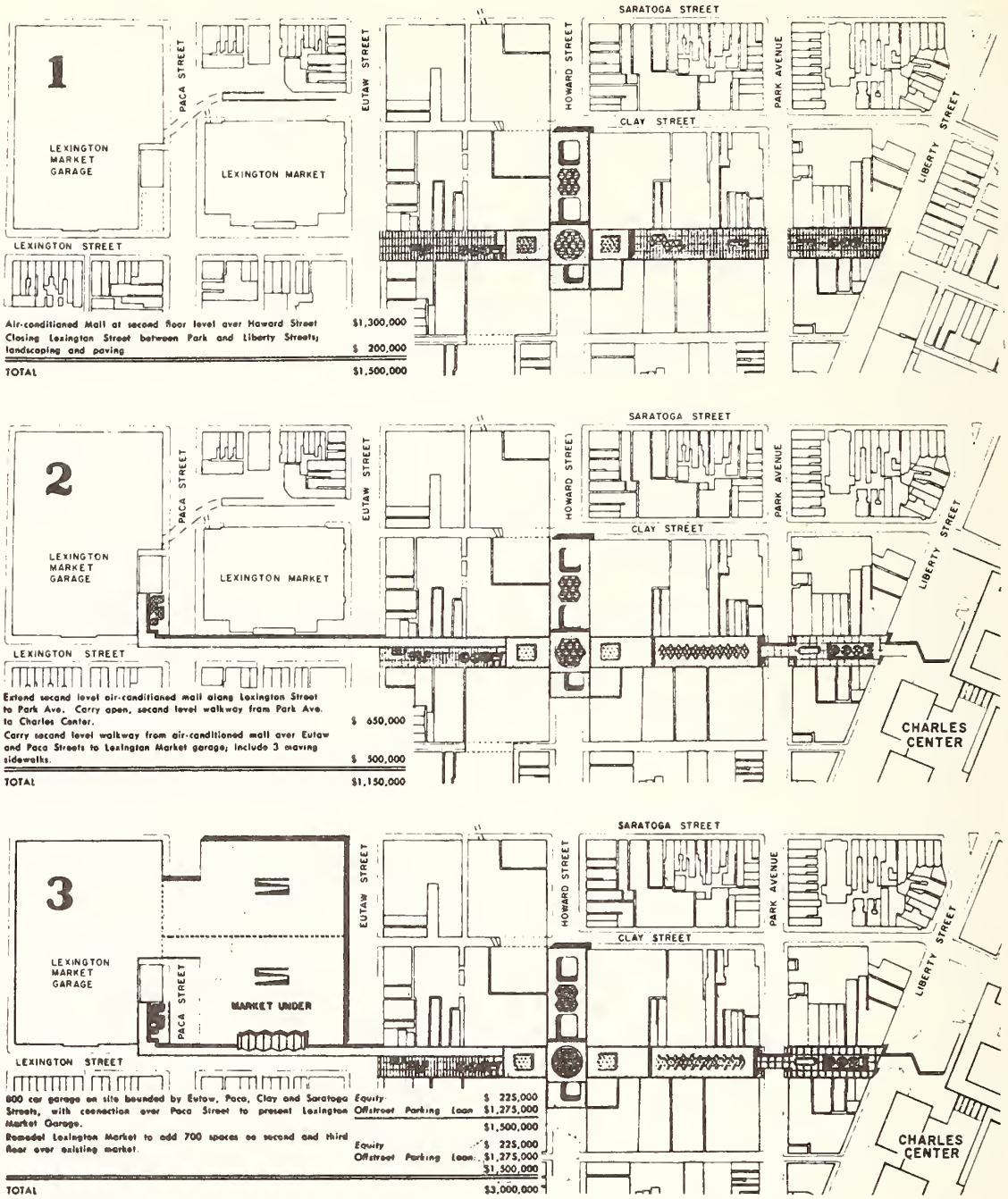
3.3 Description of Prior Design and Development Concepts

(1) the 1959 "Plan for the Central Business District of Baltimore": the Concept for a Two-Level Howard and Lexington Street Shopping Mall

In 1959, after the preparation and approval of the official plan for the Charles Center project, the Planning Council of the Greater Baltimore Committee prepared a Plan for the Central Business District of Baltimore which included a proposed "Retail Core Development Program". The program recommended the development of a two-level, enclosed, climate-controlled shopping mall along Lexington Street between the site of the Charles Center project (at Liberty and Lexington Streets) and the locations of the then-existing (East Building) and committed (Annex and Parking Garage) facilities of the Lexington Market Authority at Lexington and Paca Streets. The concept included extensions of the shopping mall northward along Howard Street to Clay Street, and southward along Howard Street to Marion Street.

The objective of the mall proposal was to unify the appearance and function of the downtown shopping complex, transforming it from a "jumble of individual stores" to the equivalent of a "natural" contemporary shopping mall. The mall was to be directly tied to the major new parking garage to be constructed as part of the Lexington Market annex. The plan also proposed that an additional 700 new parking spaces be constructed over the existing Lexington Market East Building. Howard Street was emphasized as a major transit corridor, or mall, serving the retail core from the north and south.

The recommended program was divided into three components, each consisting of two phases of implementation. The first component was the construction of the first level of the proposed Lexington Mall between Liberty and Eutaw Streets, and the construction of its second-level elements at the Howard and Lexington Streets intersection. The second program component completed the construction of the second level of the mall, and extended it westward to connect with the new Lexington Market annex garage The third element consisted of constructing



ENVIRONMENTAL IMPACT STATEMENT CITY OF BALTIMORE: THE LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT

FIGURE 3-1

1959 GBC PLANNING COUNCIL MASTER PLAN : PROPOSED RETAIL CORE DEVELOPMENT PROGRAM

SOURCE: GBC PLANNING COUNCIL

the recommended new parking structures. Figure 3 - 1 is an illustration of this overall concept.

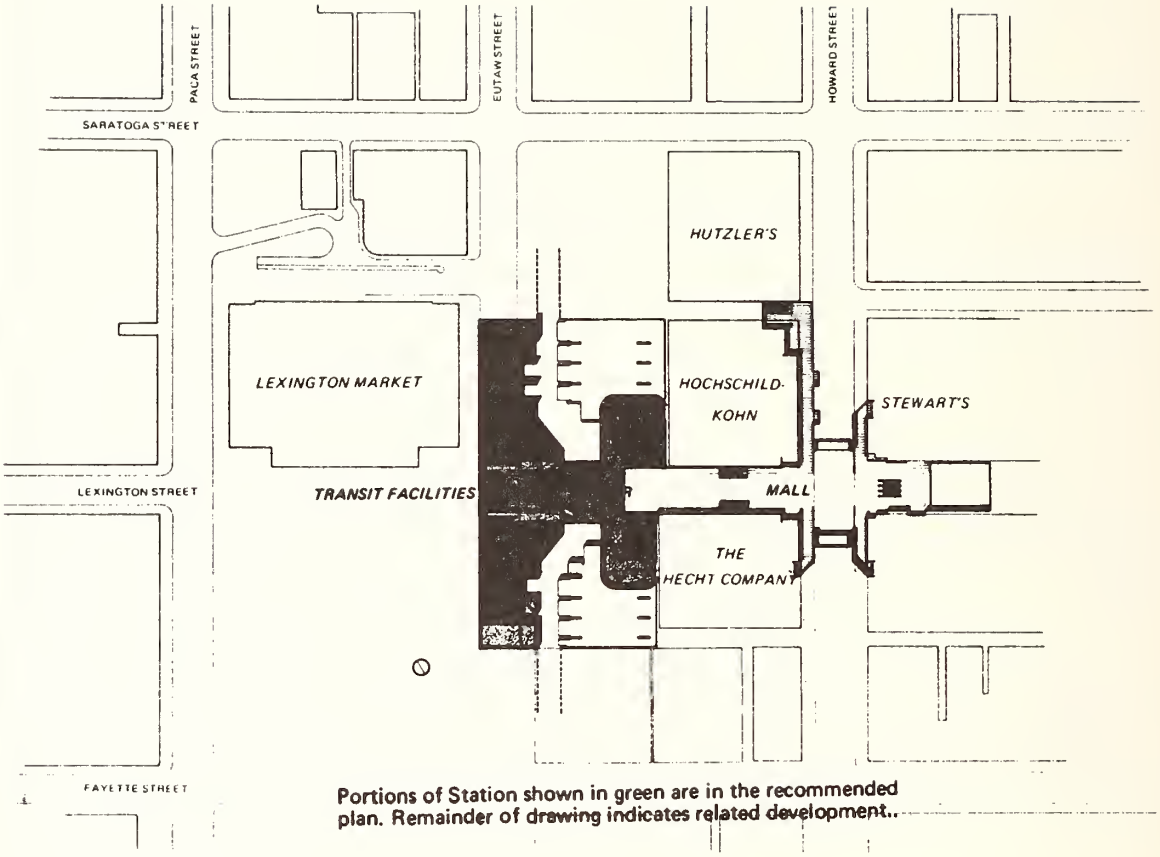
The overall program recommended for the Retail Core was not implemented, as the full energies of the Planning Council and the City were needed for the implementation of the Charles Center plan. The first grade-level sections of the Lexington Mall were built in 1974 and commitments made for the construction of the second-level pedestrian facilities which will connect it with the Charles Center project. This original Lexington/Howard Streets Mall concept was the first recognition of the need to physically and functionally integrate the Lexington Market facilities with the Department Stores and retailing environment between them and the Charles Center project. Important elements of this concept have been retained in all subsequent plans and are included in the proposed Baltimore Gardens plan.

(2) Joint Development Concepts Prepared As Part of Preliminary Engineering and Feasibility Studies for the Baltimore Region Rapid Transit System: Eutaw Street Development Plan

A series of joint development concept plans was outlined for the station sites proposed for inclusion in the Phase I rapid transit project as part of the 1968 Preliminary Engineering and Feasibility Studies prepared for the Regional Planning Council and the Mass Transit Steering Committee by Daniel, Mann,Johnson and Mendenhall and Kaiser Engineers.

The illustrative station development proposals recommended for the Lexington Market Station site included: (1) a "summer market" south of the existing Lexington Market; (2) extensive new multi-level retail development along the East side of Eutaw Street, directly connected with the station mezzanine; (3) a subterranean pedestrian mall linked by escalator to the proposed Lexington Street mall; and (4) a major new-retail development located between Saratoga and Clay Streets, adjacent to Hutzler's Department Store.

The transit station area joint development concepts illustrated in this study recognized the need for functional integration of



ENVIRONMENTAL IMPACT STATEMENT
CITY OF BALTIMORE:
THE LEXINGTON MARKET STATION
JOINT DEVELOPMENT PROJECT

FIGURE 3-2

1968 DMJM/KE FEASIBILTY STUDIES FOR PHASE I RAPID TRANSIT SYSTEM - PLAN AT LOWER LEVEL

SOURCE: DMJM/KE

the existing (and potentially expanded) Lexington Market with revitalized and new retail development along Eutaw and Lexington Streets.

The feasibility study proposed that a non-profit corporation be formed to carry out joint development activities at Phase I transit sites. It stressed the importance of the MTA's role in coordinating site acquisition and final station design in a manner which would accommodate this form of development. The proposed concepts have been used as a base-line alternative in the preparation of preliminary engineering and feasibility studies conducted by the MTA and the DMJM/KE Joint Venture for the Baltimore Gardens: Lexington Market plan.

From a historical perspective, the Eutaw Street Development Plan study was a first recognition of the potential of the rapid transit station for stimulating new retail development at this location. In addition, the plan defined the multi-level gallery design of the station in the form best suited to successfully integrate the Lexington Market facilities with new retail facilities east of Eutaw Street. The transit joint development concepts of the Preliminary Engineering Feasibility Study are illustrated in Figure 3 - 2.

(3) the 1975 "Pedestrian Circulation Study for Downtown Baltimore": Concept Plans for a Eutaw Retail Aracade, Lexington Street Mini-Park, and Extension of the Lexington Street Mall

In 1975 the City of Baltimore commissioned RTKL Associates to prepare a Pedestrian Circulation Study for Downtown Baltimore. RTKL identified major pedestrian patterns in the downtown area through a series of selected pedestrian counts, a planning reconaissance, and a sidewalk opinion survey, and recommended the types of pedestrian facilities required for each movement corridor. Urban design studies were prepared for major sections of the downtown area.

The Eutaw Street Retail Arcade concept was based on the continuous mezzanine level and knock-out panel provision features of the preliminary engineering design for the Lexington Market station. The study stated that "the subway mezzanine presents the opportunities to create a two-level shopping arcade along Eutaw Street with direct connections providing accessibility

to all major activities in the area, including the Lexington Market, the Lexington Mall, shops along Eutaw Street and the subway".

The proposed retail arcade development extended the full length of the east side of Eutaw Street between Lexington and Saratoga Streets. The intent of the concept was to maximize the use of the subway mezzanine level. Entry courts and light wells were proposed to open lower level spaces to both Eutaw Street and second-level developments.

It was also proposed that the two-level arcade be connected via a future pedestrian concourse with the Social Security Complex to the northwest.

An "outdoor summer market" was proposed for the area south of the Lexington Market, as an extension of the Market itself.

The development of the arcade was proposed as a joint project of the public and private sectors.

The Pedestrian Study also recommended an urban design concept for the extension of the Lexington Mall between Howard and Paca Streets, and linking the following activity centers:

-the Department Stores along Howard Street
-The Lexington Market (East and West Buildings)
-the Lexington Market rapid transit station
-a proposed Howard Street Bus Transitway
-the Social Security Complex
-the University of Maryland Downtown Campus
-the Charles Center Area, and
-the residential neighborhoods west of Greene Street

The attitude survey conducted by RTKL revealed a strong public desire for this extension, and for the provision of additional seating and landscaped areas along the completed sections of the Mall.

The design concept also proposed a Lexington Street Mini-Park between Howard and Eutaw Streets. The study noted that:

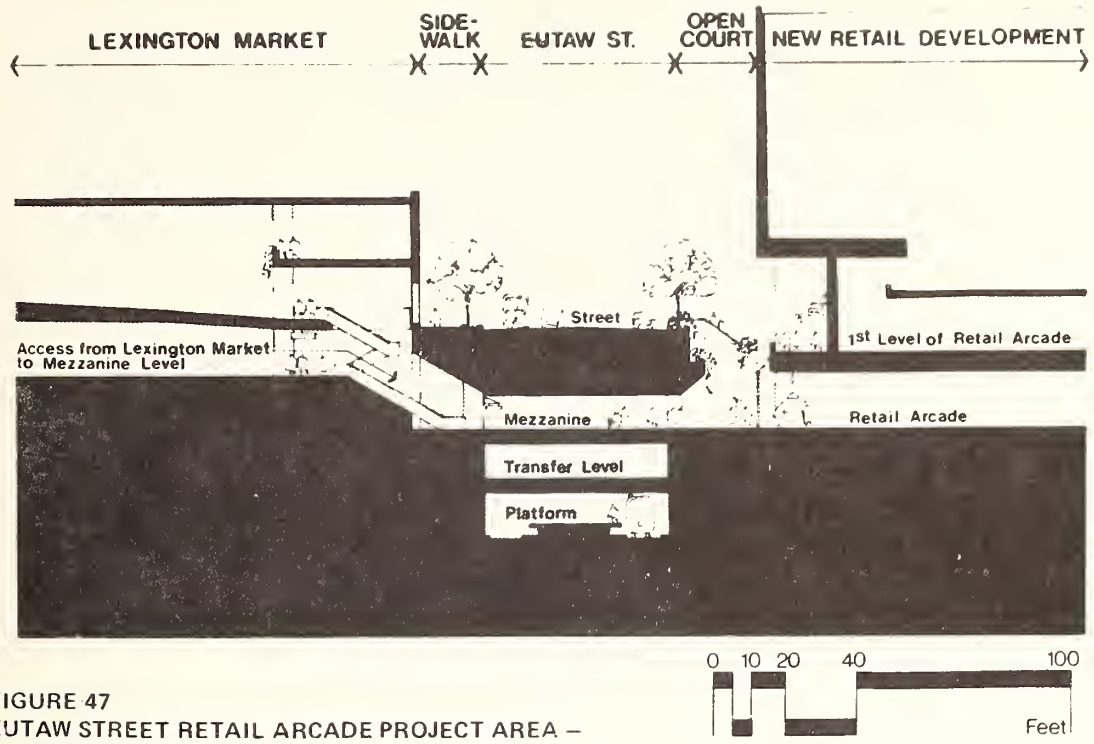


FIGURE 47
EUTAW STREET RETAIL ARCADE PROJECT AREA – SECTION A

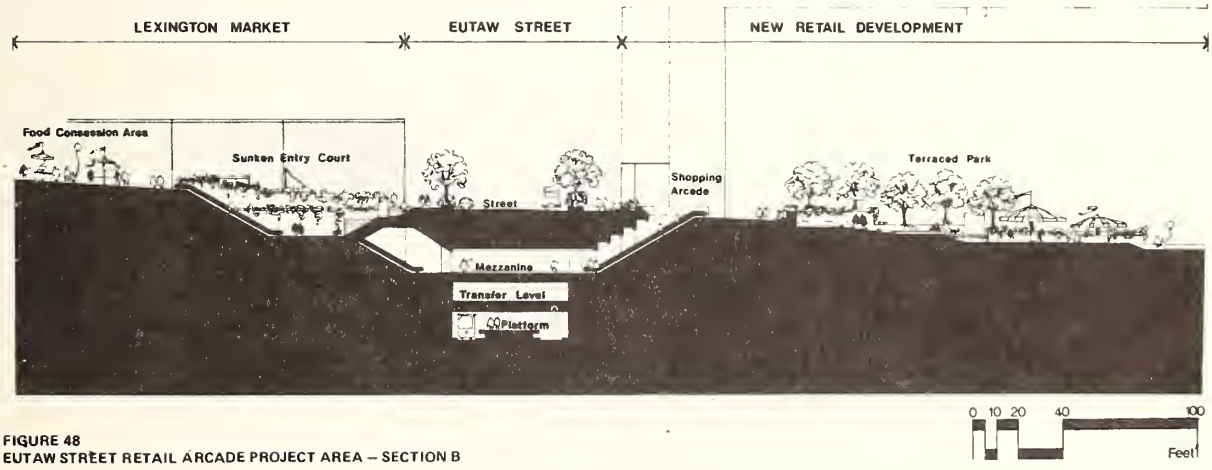


FIGURE 48
EUTAW STREET RETAIL ARCADE PROJECT AREA – SECTION B

ENVIRONMENTAL IMPACT STATEMENT CITY OF BALTIMORE : THE LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT

FIGURE 3-3

1975 RTKL PEDESTRIAN CIRCULATION STUDY : PROPOSED EUTAW STREET RETAIL ARCADE / SECTIONS

SOURCE: RTKL

"The park will incorporate a series of landscaped terraces and cascaded seating alcoves which take advantage of the 24-foot change in grade (along Lexington Street). The terraced lineal park area will provide a major opportunity for outdoor seating within the busy shopping district. In addition, this block will provide direct access to bus transportation at Howard Street and to the rapid transit system at Eutaw Street by the provision of escalators extending from the Mall directly to the subway mezzanine level". The concept proposals of The Pedestrian Circulation Study for Downtown Baltimore are illustrated in Figure 3 - 3.

Each of these concepts is reflected in the preferred alternatives for the proposed action.

(4) The 1976 "Plan for Lexington Center": The Development Concept for Lexington Square

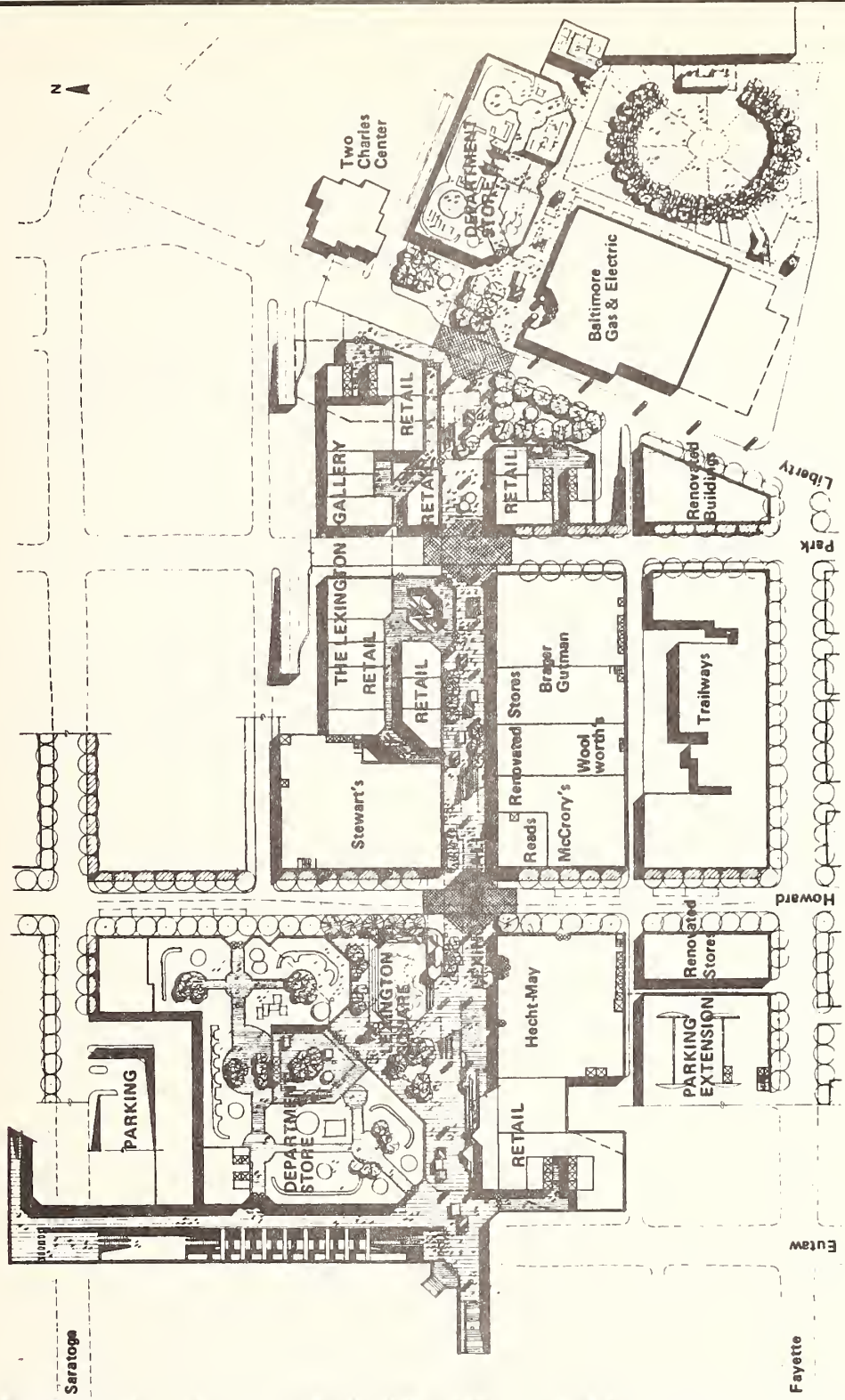
In 1976, Wallace, Mc Harg, Roberts and Todd, working with the Greater Baltimore, the Retail District Study Executive Committee, and the firm of Arthur Cotton Moore and Associates, prepared The Plan for Lexington Center, a development concept for the core of the retail district. With some modifications, this development concept was subsequently adopted by the Retail District Study Executive Committee as a recommended long-range, land-use master plan for the retail district.

The plan proposes 1.7 million square feet of mixed new construction (retail, entertainment, commercial, office, and apartment) plus extensive new parking facilities and rehabilitation of existing retail stores.

It proposed the major redevelopment of the block bounded by Eutaw, Saratoga, Howard, and Lexington Streets with a multi-level, mixed-use complex which it called "Lexington Square".

The proposal for Lexington Square included: 224,000 square feet of retail and entertainment space, including 10,000 square feet of entertainment space; a 1200 car parking garage; an open plaza; and a 300 unit high-rise apartment tower above the department store.

The Lexington Square concept includes an integrated multi-level facility with retail activity at three levels. The plaza



ENVIRONMENTAL IMPACT STATEMENT CITY OF BALTIMORE: THE LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT

FIGURE 3-4

1976 WMRT PLAN FOR LEXINGTON CENTER: PLAN OF LEVEL A - ELEV. 58'-64'

SOURCE: Wallace, McHarg, Roberts & Todd

adjacent to Howard Street and the Lexington Mall is at the same level as the exit of the Lexington Market rapid transit station. The plan incorporates an extension of Lexington Mall and a transit mall (buses only) on Howard Street, as well as a permanent, elevated Downtown People Mover system along the Lexington Street Mall.

The Lexington Square and Lexington Center concepts are illustrated in Figure 3 - 4 . This concept is reflected in the Scheme D (Higher Intensity of Development) alternative for the proposed project.

(5) Urban Design Concepts Prepared for the Revitalization of the Retail District by Mr. Cyril Paumier

Since 1975, when the City and the Greater Baltimore Committee initiated physical planning activities as a part of the Retail District Revitalization Study, Mr. Cyril Paumier has been developing design ideas for the Howard and Lexington Street area.

Mr. Paumier is a professional urban planner and landscape architect. He is a principal and founding partner of Land Design Research Associates of Columbia, Maryland, and was formerly a Director of Design with the Rouse Company of Columbia, Maryland. He has developed his ideas for the retail district as a concerned citizen and professional, and has worked closely with members of the Public Policy Committee of the Baltimore Chapter of the American Institute of Architects and of the Baltimore City Committee and staff of the Maryland Historical Trust.

Initially, Mr. Paumier's presentations focused on his recommendation that the Section A rapid transit project be abandoned in favor of a scheme which would have divided the $721 million budget for that project equally between community development and transit construction expenditures. He proposed replacing the Section A transit project with a less expensive elevated medium-capacity transit facility, which he advocated building through the Central Business District along the present alignment of Park Avenue. He advocated spending the transit construction money thus saved to recycle the public and private environment adjacent to this elevated line.

In presentations made during early 1977, Mr. Paumier emphasized his professional opposition to any form of elevated downtown

people mover in the downtown area. He stressed his view at the time that an elevated transit structure was incompatible with the scale of downtown Baltimore, and advocated that an automated people mover be built at grade.

During the summer of 1977, Mr. Paumier developed a position paper on the Retail District program which proposed the following objectives:

"Seek a revitalization strategy with the shortest possible time frame and one that can result in an immediate action program with minimum disruption to present business activity.

Encourage the participation of existing property owners and merchants by offering attractive investment financing and establishing coherent public policy that creates a "stable climate for reinvestment".

Encourage the formation of a strong business organization to promote the Center and oversee its operations.

Ensure that a sound merchandising plan is the basis for the revitalization program.

Maintain the continuous use of the Center and begin immediately to stimulate increased business activity.

Build upon the urban charm and character that is present in many of the older buildings in the Center. Make this the dominant theme in planning and designing the new development parcels in the area.

Explore to the fullest the re-use of each existing building in the Center, using demolition only when no other viable alternative is feasible. Renovation is almost always cheaper than new construction.

Develop a program of public improvements consistent with the resources of the City and phased in consort with a program of private reinvestment."

In his most recent presentation, Mr. Paumier has stressed four "Reinvestment Priorities" for the Howard and Lexington Streets area:

Recycling the public environment

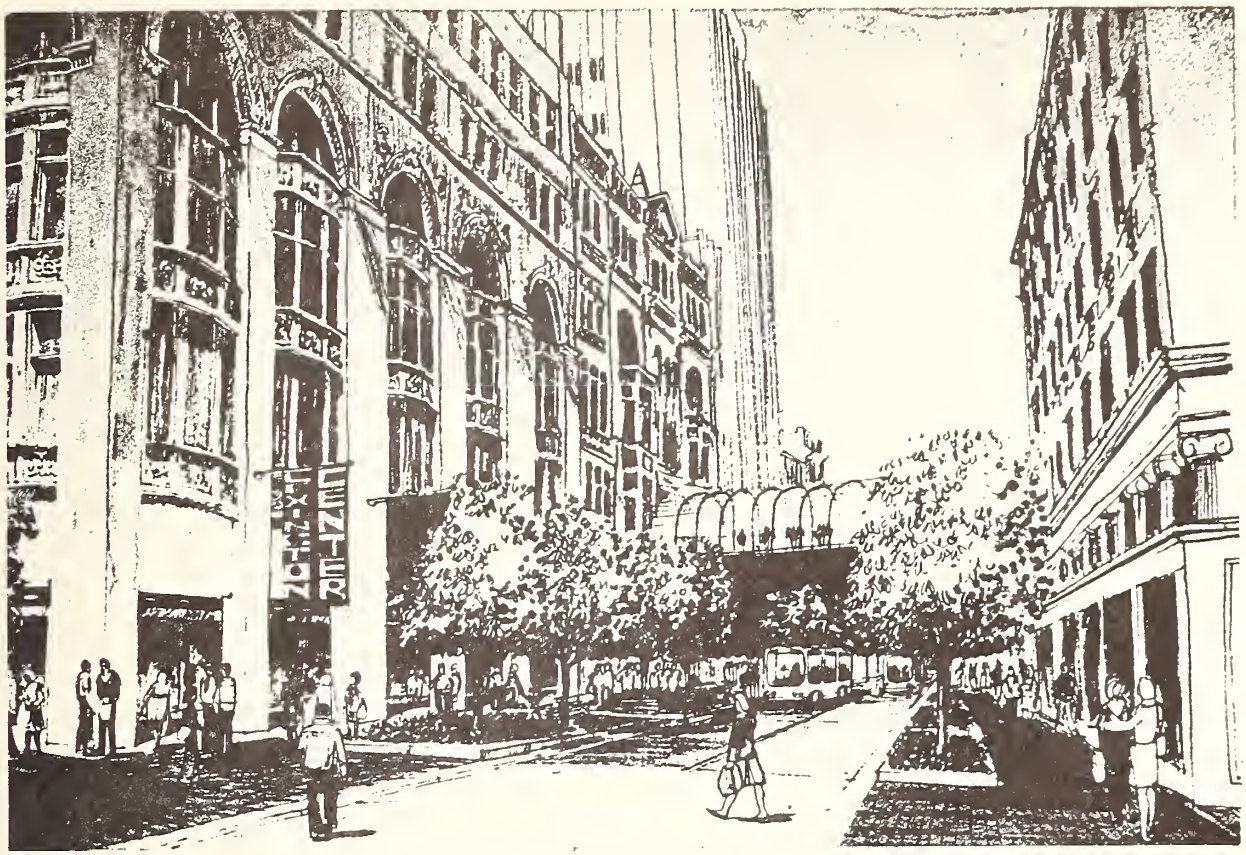
A comprehensive program for exterior renovation based on loans to property owners and tenants

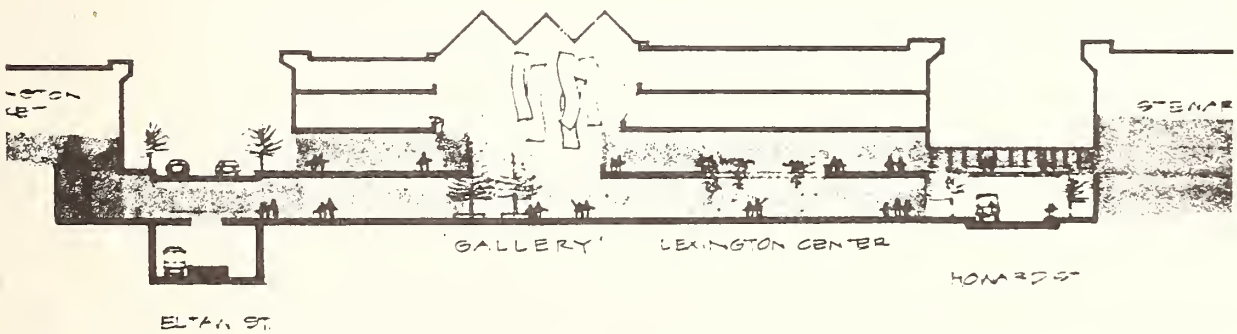
Interior recycling

Development of a Shopping Gallery

He recommended that "the focus of the recycling program be on stimulating private investment through public improvements" and that land acquisition and clearance in the Retail District be limited to that necessary for the development of the proposed Shopping Gallery.

During the Fall of 1977 Mr. Paumier prepared several concept sketches illustrating his ideas for the recycling of the block bounded by Saratoga, Howard, Lexington and Eutaw Streets. He recommended the recycling and redevelopment of this site for a major shopping galleria which would serve as a catalyst for the revitalization of the larger retail district. He recommended that the proposed galleria be directly joined to the mezzanine level of the Lexington Market Station. He also advocated retaining as many of the existing structures along the perimeter of the block as could economically be recycled. In response to questions from area merchants and members of the Baltimore City Committee of the Maryland Historical Trust at a meeting at Saint John's Church on September 26, 1977, Mr. Paumier stated that he advocated demolition of all existing structures on this site if that were necessary for the development of a successful shopping gallery.





ENVIRONMENTAL IMPACT STATEMENT CITY OF BALTIMORE: THE LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT

FIGURE 3-5

1977 URBAN DESIGN CONCEPTS BY CYRIL PAUMIER: CONCEPT FOR RELATIONSHIP BETWEEN RECYCLED BLOCK AND TRANSIT STATION, AND SKETCH SHOWING HOWARD STREET LANDSCAPING

SOURCE: CYRIL PAUMIER

Mr. Paumier's sketches are illustrated in Figure 3 - 5. They have served as the basis for the development of the "Scheme A" alternative described below.

3.4 Objectives Employed in Developing Project Alternatives

The following objectives have been used in developing the project alternatives:

- to achieve the greatest feasible variety of land uses, and intensity of development, within the proposed project site area;

- to effect close integration between the proposed joint development project and the design, construction, and operation of the Lexington Market Rapid Transit Station;

- to result in significant increases in transit ridership for the Phase I/Section A Baltimore Region Rapid Transit System;

- to provide new jobs, both in construction and in the operation of new private facilities, within the City of Baltimore;

- to provide the basis for beginning a revitalization program for Baltimore's downtown retail district within the shortest possible time-frame;

- to stimulate the formation of an effective public/private partnership for successful urban development of the project site;

- to strengthen the tax base of Baltimore City;

- to enhance the environmental image of the City's downtown retail district.

The following sections of this chapter describe each of the project alternatives developed on the basis of these general criteria, and explain the selection of the preferred alternatives.

3.5 The No-Action Alternative

The No-Action alternative illustrates conditions and developments likely to occur within the project site area and its environs should the proposed Federal action not be taken.

In November 1975 Real Estate Research Corporation, as part of the Retail Revitalization Study for Downtown Baltimore, prepared A Summary Report of the Analysis of Alternative Retail Strategies for Baltimore's Central Business District. A copy of this report is available for inspection. One of four alternative strategies analyzed by Real Estate Research Corporation in this report was entitled the "Present Policies Strategy". This strategy analyzed the effect on the retail district of continuing present policies (prior to the proposed action described in this EIS) unchanged, with the exception of actions for which commitments had previously been made.

The following previously committed public actions were identified:

(1) construction of the Lexington Market rapid transit station, including construction of its southeast entrance at the originally planned location in the bed of Lexington Street between Howard and Eutaw Streets;

(2) extension of the Lexington Mall, by the City, westward from Howard Street to Paca Street;

(3) a program of gradual improvements to the Lexington Market, on a year-by-year basis, through the City's Capital Improvement Program;

(4) construction of the first phase of the Social Security Administration downtown office complex (providing 5200 jobs), at Greene and Saratoga Streets, four blocks north and west of the Howard and Lexington Streets "100%" corner; and

(5) continuing expansion of the University of Maryland's downtown professional schools campus, including the construction of a new 580 bed Veterans Administration Hospital at Fayette and Greene Streets (four blocks south and west); construction of a new School of Social Work and Community Planning at Redwood and Paca Streets (five blocks south and west); and the expansion of the University's Law School facilities at Fayette and Paca Streets (three blocks south and west).

No significant private commitments for new investment were identified in the retail district (or within the larger Core Study Area identified for the purposes of this environmental assessment).

Since 1975, successful homesteading programs have been initiated in the Otterbein (Inner Harbor West), Barre Circle and Ridgely's Delight (south and west of the Fremont Avenue/City Boulevard edge of the University of Maryland campus) areas. Public and private programs have also been initiated to recycle some of the fine old Loft Buildings in the City's Loft Building District (traditionally the downtown area's Garment District, south of Baltimore Street, between the Civic Center and the University of Maryland Campus) for residential use, and to revitalize the traditional downtown center of the City's Asian community, at Park and Mulberry Streets.

In all other respects, the "Present Policies Strategy" described by Real Estate Research Corporation remains an accurate portrayal of "No-Action" trends within the retail district. Consequently, it will be used as a basis for outlining the probable consequences of a No-Action alternative.

No-Action alternative is illustrated in Figure 3 - 6.

Real Estate Research Corporation predicted that, under a present policies/no-action strategy, total CBD retail sales would decline from $185.4 million in 1975 to $124.7 million in 1985, a decrease in overall sales of 32.7% over a ten year period.

RERC also forecast, under this alternative, that total retail district department store sales would decline from approximately $68.0 million in 1975 to $37.3 million in 1985, a decline of 54% over a ten year period.

RERC predicted that at least two major downtown department stores would close as a result of no significant public action to upgrade the retail district, and that the sales volumes previously achieved by these stores would be "lost" (e.g. not reflected in increased sales by the remaining stores) to the district.

RERC also predicted that no new office space would be developed within the district under this alternative, and that no other major new uses of any kind would be developed within the area.

Hochschild-Kohn and Company, formerly one of the five major department stores in the retail district, terminated business operations in its downtown store in August of 1977. During 1975 and 1976 the Hutzler's Department Store reduced its active sales floor space by approximately 30%, leaving the third and fourth floors of its downtown building complex vacant.

In fact, downtown department store sales volumes in the retail district have declined at a much faster rate than foreseen by Real Estate Research Corportaion in 1975. RERC predicted a 1978 total department store sales volume of $54 million. The actual consolidated sales volume reported by the retail district department stores for fiscal year 1978 (which ended January 31, 1978) was between $42 and $46 million, 15-20% lower than the RERC prediction.

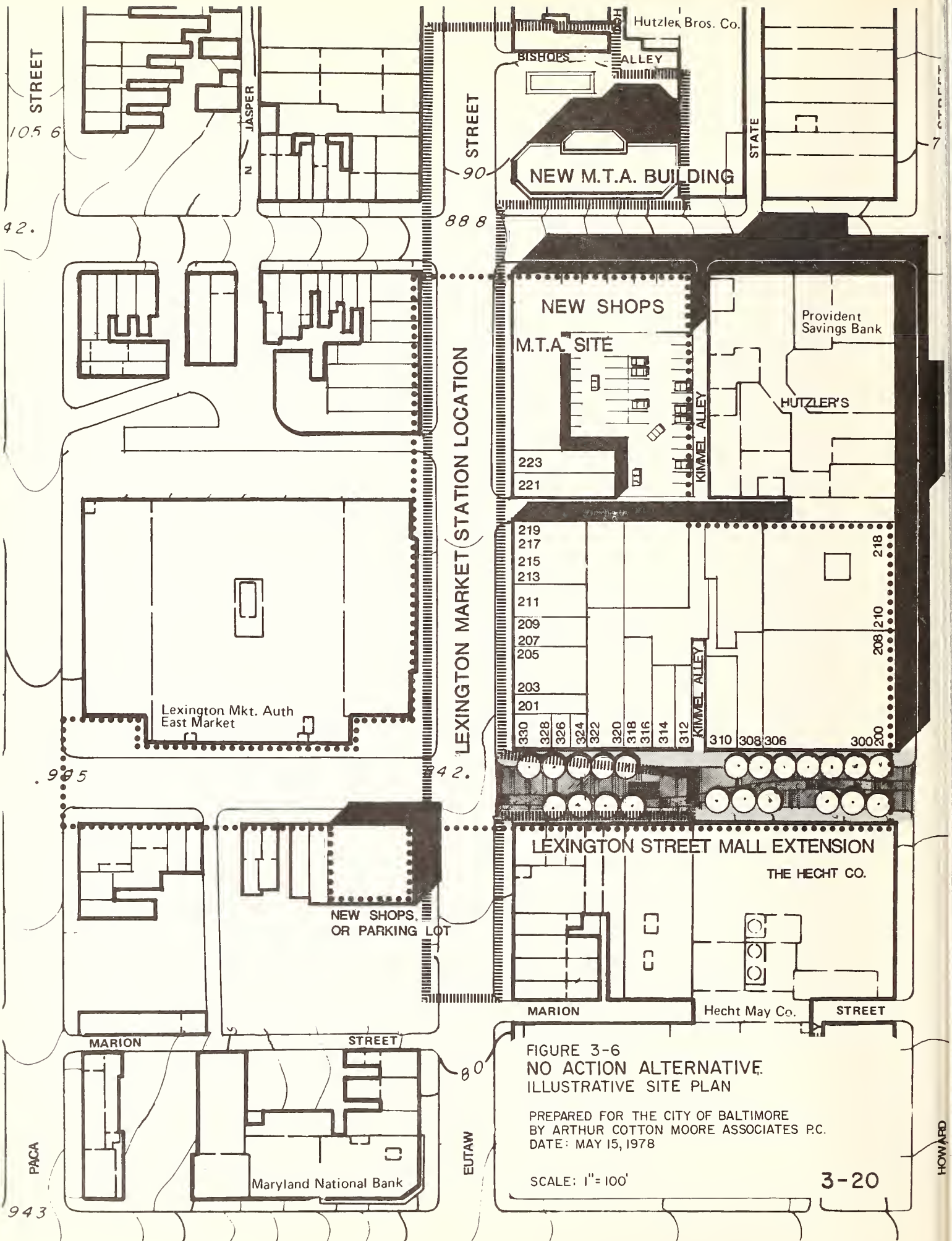


FIGURE 3-6
NO ACTION ALTERNATIVE
ILLUSTRATIVE SITE PLAN

PREPARED FOR THE CITY OF BALTIMORE
BY ARTHUR COTTON MOORE ASSOCIATES P.C.
DATE: MAY 15, 1978

SCALE: 1" = 100'

It is now anticipated that,under a continuation of a "present policies" or "no action" approach to the problems of the retail district, that one or more additional department stores may terminate their business operations in this area.

Extending the current actual department store sales volume trend to 1985, it is possible that only two major department stores may exist in the retail district by that year, with a total department store sales volume significantly less than $30 million per year.

The effect of this alternative on anticipated transit ridership is significant. Under a No-Action, or Present Policies, alternative the number of transit riders predicted to use the Lexington Market Station during the two peak (a.m. and p.m.) travel periods of a typical work day in 1982 is 9,400 This ridership estimate is documented in the October 1, 1976 Mass Transit Administration report entitled Patronage Analysis - A Report on Validation Studies for Section A, which was presented to the 1976 Maryland General Assembly. A copy of this report is available for inspection. However, since the preparation of these ridership estimates by the MTA, the downtown Hochschild-Kohn department store has closed, other department stores have reduced their sales floor areas and downtown work forces, and the general pattern of decline in major sales and employment activity in the retail district has continued. It can reasonably be anticipated that, under a No-Action alternative, 1985 patronage use of the Lexington Market Station will be less than 9,400 riders during the peak periods.

The Lexington Market Station , as currently being constructed, has been designed to have a 1985 peak period ridership potential of approximately 25,000 persons per day. Provision has also been made in the design of the basic station structure (through the installation of knock-out panels at the north and south ends of the west wall of the station) for the future development of two additional public entrances: a northwest public entrance, at Eutaw and Saratoga Streets, and a southwest public entrance, at the southwest corner of Lexington and Eutaw Streets. The basic station facility, with the possible future addition of a third and fourth public entrance, and the addition of the maximum amount of fare-collection and vertical movement equipment for which space is available, is capable of an ultimate peak-period ridership potential approaching 100,000 trips per day.

Under the No-Action alternative, it is estimated that:

(a) the 1985 actual ridership use of the station will be less than the expected 14,200 daily riders;

(b) the actual ridership may be less than 50% of the 1985 designed ridership potential of the facility;

(c) actual ridership use of the station will never justify the construction of either, or both, of the additional two public entrances, and will not adequately support either the in-place investment or the ultimate potential capacity represented by the constructed station facility.

The No-Action alternative is viewed as inconsistent with national and local public policies which seek to encourage public transit ridership in urban areas, and the fullest utilization of the transit installation now under construction.

The No-Action alternative projects the following probable conditions in the retail district by 1985:

(1) Continuing, and accelerating decline in retail sales volumes achieved by the remaining department stores, and a similar, although somewhat slower, decline in retail sales by the smaller stores;

(2) Continued physical deterioration of the public environment within and around the proposed project site area, and throughout the retail district;

(3) Full operation of the Phase I/Section A rapid transit line by the Mass Transit Administration, including the Lexington Market Station, but with less than desirable patronage use of the station as a result of the continuing decline of the retail district;

(4) Continued occupancy and retail use of the smaller retail store properties along the Eutaw and Lexington Street edges of the proposed project site, as individual stores. While it is possible that some of these stores might experience a perceptible increase in sales as a result of major department store(s) closures (capturing a small percentage of the retail business formerly attracted to the closed department store, or stores), this increase would be temporary, and the majority of these stores would then begin to experience declining sales themselves;

(5) The various owners of the land and buildings which comprise the former Hochschild-Kohn Main building complex (including Hochschild-Kohn itself, which owns approximately 60% of these properties) would make every effort to lease the vacant space in their buildings. As these individual proporties have been subjected to far-reaching structural changes over the past 80 years, in repeated efforts to make them functional for use as a single, overall department store, the owners might either collectively lease the premises to a group of individual smaller retail businesses, or subdivide building space along the lines of actual ownership (which requires the erection of seven story party walls, and the provision of each resulting "individual" building with self-contained heating, plumbing, electrical, and mechanical systems)for individual leases with individual retail establishments. While the success of these efforts cannot be accurately predicted (due to the legal complexity of the present leases between Hochschild-Kohn and Company and other owners of these properties, and to the physical complexities of this building complex), it can be reasonably anticipated that the bulk of the upper story space in this complex (approximately 210,000 square feet of space is contained in this complex, on 7 levels) would be unleasable and would remain vacant. This is as a result of functional obsolescence and the unsuitability of this space for modern retailing, as well as the present absence of demand (under a continuation of present public policies toward this area)

by large retail users for space in this location. The resulting economic condition of these properties would place a further drain on the tax-base of the City, and cause serious additional blighting influence within the retail district.

(6) The properties at 311-319 West Saratoga Street and 225-237 North Eutaw Street, which have been purchased by the Mass Transit Administration (in 1976) for temporary use as a contractor's storage and work area for the construction of the Lexington Market transit station, and cleared of buildings for this purpose, will be disposed of by the MTA, by sale or lease, on the private market, for the highest obtainable price. In the absence of an active revitalization program for the project site area, it is reasonably anticipated that the private sector market for this site-offering would be limited to either parking lot use or partial one-story development for discount retailing use.

(7) The property leased by the Mass Transit Administration at 401-405 West Lexington Street for temporary use as a contractor's storage and work area for the construction of the Lexington Market tunnels and station, will be returned to its private owner (lessor to the MTA). The MTA, under the terms of its lease, has demolished the building which occupied this site. Consequently, cleared land will be returned to the current owner. It can reasonably be expected that the short term highest and best use (offering the highest immediate net return to the owner) for this parcel of land will either be for parking lot use, or, more probably (given the proximity of the completed transit station) one-story retail building development oriented to Lexington Market and Lexington Market Station pedestrian activity.

(8) The property leased by the MTA at 112-120 North Eutaw Street (formerly a surface parking lot) for temporary use as a contrator's storage and work area for the construction of the Lexington Market tunnels and station, will be returned by the MTA to its current owner. This is a large

parcel of land (over 30,000 square feet), separated from Lexington Street and the Lexington Market by a row of approximately 8 individual privately-owned buildings. It may reasonably be anticipated that some interest would exist for a larger, privately-accomplished site assemblage to include 401-431 West Lexington Street and 119 and 123-125 North Paca Street, for possible sale or use for development of a private office building or other major new use adjacent to the Lexington Market and Station. However, the difficulties of accomplishing such a private assemblage (given the number of owners and the difficult relationship between indicated current land value and market demand) are significant, and, in the absence of a supportive public revitalization program for the area, it can reasonably be predicted that no private market will exist for major new uses at this location. One possible exception which can be identified is the University of Maryland, which begins one block to the southwest. The University is preparing to build a new Law School library facility at the southwest corner of Paca and Fayette Streets. However, the University has established a master plan which defines Paca Street as the eastern limit of all future campus development. It has no future identified building projects for which numerous site opportunities do not already exist within the defined campus area. Consequently, the plan drawing illustrating the No-Action alternative shows this site returning to surface parking lot use.

Under the No-Action alternative, the City has decided to limit its commitment to the Lexington Mall extension to the one block between Howard and Eutaw Streets, in order to accomodate the entrance to the subway station only.

There is a significant relationship between the development of the "Area 3B" site in Charles Center (See Figure 3 - 6) and the revitalization of the adjacent retail district. Every indication is that the planned development of the Area 3B site (at the northeast corner of Lexington and Liberty Streets) with a major retail use will not occur without an

established public revitalization program for Howard and Lexington Streets. Consequently, under the No-Action (or "Present Policies") alternative area 3B is shown continuing in its present use: as a temporary ice-skating rink.

The No-Action alternative has been rejected for the following reasons:

(1) The policy of the City of Baltimore is to employ all reasonable public and private resources to effect the highest achievable upgrading of the retail district. The no-action alternative would confirm and continue the accelerating decline of this area, which would be reflected in both a deteriorating public environment and declining retail sales volumes; and

(2) The No-Action alternative does not maximize the potential contribution of the State and Federal investments in the Phase I/Section A rapid transit line, and particularly the large monetary investment (approximately $30 million) in the construction of the Lexington Market transit station, to the successful revitalization of its surrounding environment; in fact, it is anticipated that the No-Action alternative will jeopardize the success of the State and Federal investments in these projects.

3.6 Proposed Change in Location for the Southeast Entrance Facilities for the Lexington Market Rapid Transit Station

This section explains the reasons for the design change proposed for the Lexington Market rapid transit station as a result of the Lexington Market Station Joint Development Project.

The final design location for the Lexington Market transit station was chosen by the Mass Transit Administration in 1968. The environmental impact statement for the Phase I/Section A rapid transit system received final approval in 1972. Final

architectural and engineering design work for the Lexington Market station was initiated by the MTA in 1974. Final design and construction documents were completed by the MTA during the Spring of 1977. The MTA began the construction of the Lexington Market tunnel sections of the Phase I/Section A system, at the intersection of Lexington and Eutaw Streets, during the Fall of 1977. Construction of the Lexington Market station structure began in March, 1978.

Prior to the development of the City of Baltimore: Lexington Market Station Joint Development plan, the southeast public entrance facility for the station had been planned for construction within the bed of Lexington Street between Howard and Eutaw Streets. (See Figure 3 - 7). Final architectural and engineering plans for this entrance facility were incorporated in the overall station construction documents completed by the MTA in 1977.

However, the development of the joint development project plan, in close coordination with the MTA, made it necessary to evolve the final design and construction plans for the southeast entrance and the first phase of the retail district revitalization program as integrated elements of a single plan for the proposed project site.

Consequently, the City and the Retail District Executive Committee have proposed to the MTA that the loaction of the southeast entrance be changed from the bed of Lexington Street to a new location within the joint development project site, between Clay and Lexington Streets (See Figure 3 - 7).

The originally planned southeast entrance was designed as a conventional subway entrance parapet, containing two escalators and a stair, leading through an underground tunnel beneath Lexington Street to the station structure itself, which is located beneath Eutaw Street.

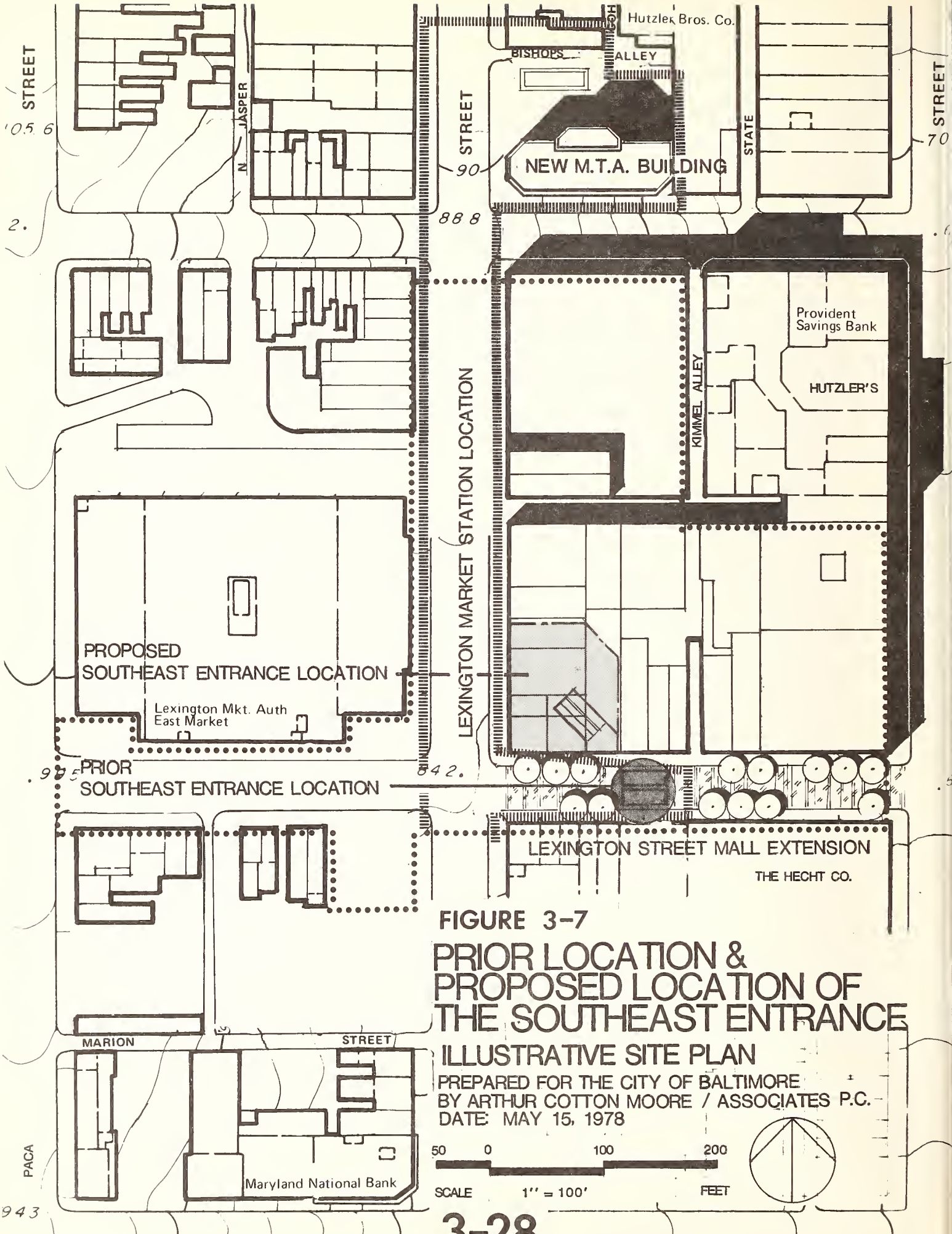


FIGURE 3-7

PRIOR LOCATION & PROPOSED LOCATION OF THE SOUTHEAST ENTRANCE

ILLUSTRATIVE SITE PLAN

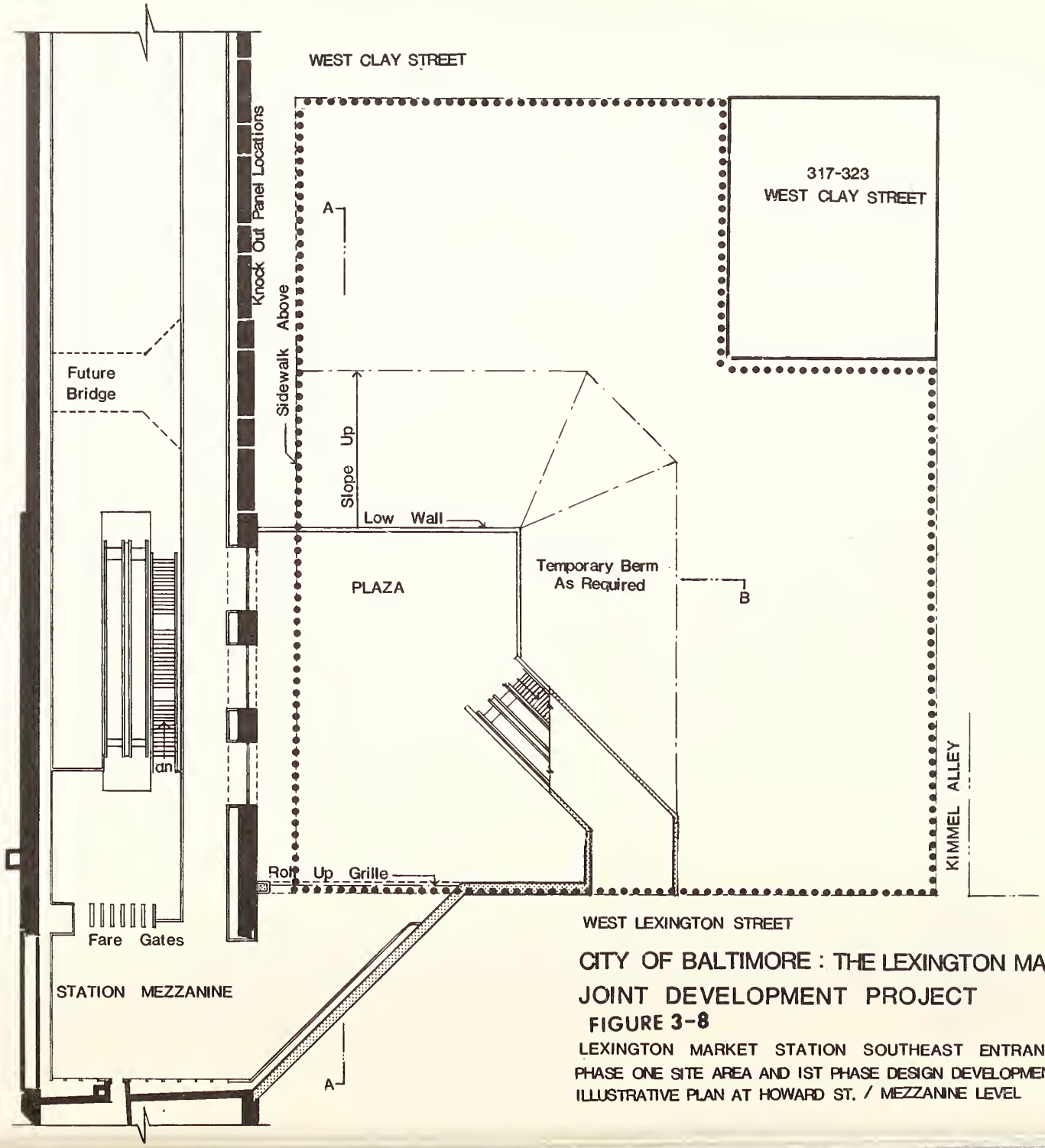
PREPARED FOR THE CITY OF BALTIMORE
BY ARTHUR COTTON MOORE / ASSOCIATES P.C.
DATE: MAY 15, 1978

50 0 100 200
SCALE 1" = 100' FEET

The proposed change in location for the southeast entrance to the joint development site will result in a station entrance of significantly different character.

The Mass Transit Administration foresaw the desirability of providing for the possibility of future "tie-ins" to adjacent development (along the east side of Eutaw Street between Saratoga Street and Lexington Street) in its earliest design planning for the Lexington Market Station. As a result of the natural topography of the project site area (which slopes downward from Eutaw Street to Howard Street) the mezzanine floor level within the station structure is approximately level with the existing grade of the Howard and Lexington Street intersection one block to the east. Consequently, the MTA provided a continuous row of eighteen foot wide "knock-out panels" within the east wall of the station structure at mezzanine level. The east wall of the station structure is located along the east edge of Eutaw Street. The mezzanine level of the station structure is located approximately 28 feet below the street surface of Eutaw Street.

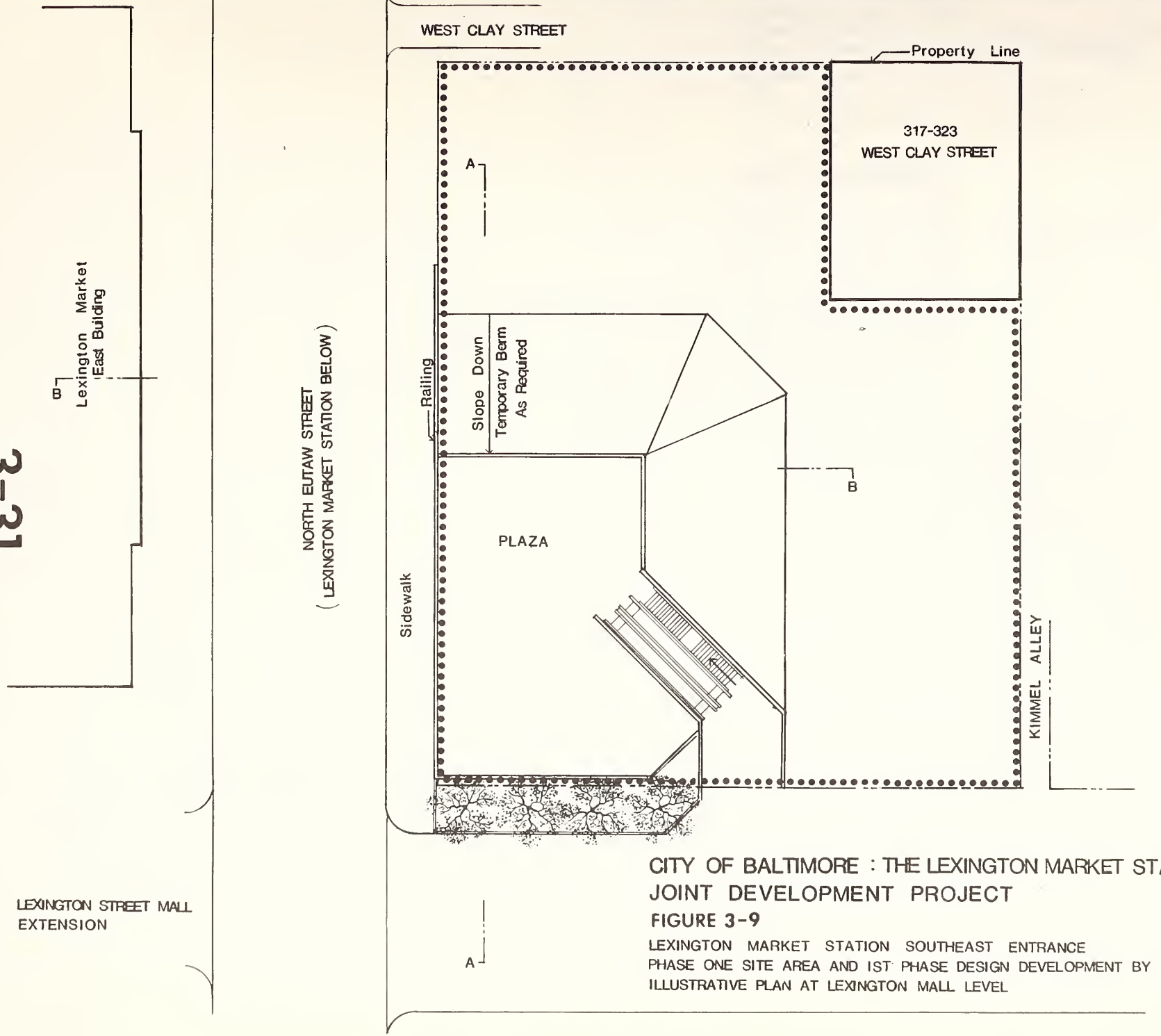
The Baltimore Gardens southeast entrance design makes use of the knock-out panel openings between Clay Street and Lexington Street for ingress and egress between the station itself and the surrounding environment. A plaza is provided east of the station wall, occupying land at the northeast corner of Eutaw and Lexington Streets, at the level of the mezzanine floor within the station structure (approximately 28 feet below the level of Eutaw Street). In addition, two escalators and a stair are provided between the proposed plaza and the proposed extension of the Lexington Street Mall. These design relationships are illustrated in Figures 3 - 8 and 3 - 9. Figure 3 - 8 illustrates the initial portion of the mezzanine level plaza to be constructed by the Mass Transit Administration, using construction funds from the construction budget for the Phase I/Section A Baltimore Region Rapid Transit System. The enlargement of the entrance plaza northward to Clay Street would employ funds provided through the proposed grant which is the subject of this EIS. The ultimate, or final, development of the plaza, will be contingent upon final agreements negotiated between the City of



CITY OF BALTIMORE : THE LEXINGTON MARKET STATION
JOINT DEVELOPMENT PROJECT

FIGURE 3-8

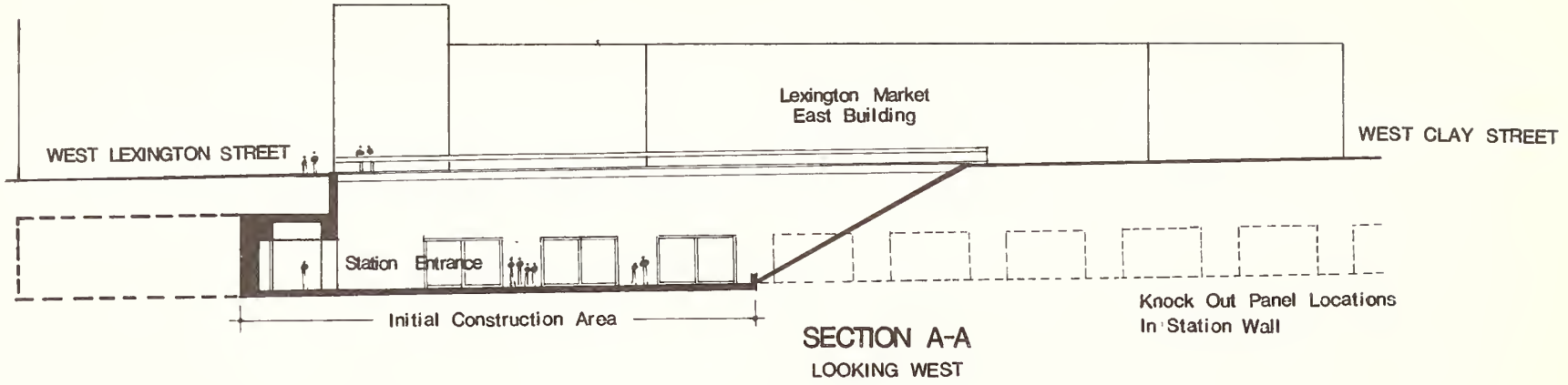
LEXINGTON MARKET STATION SOUTHEAST ENTRANCE
PHASE ONE SITE AREA AND IST PHASE DESIGN DEVELOPMENT BY MTA
ILLUSTRATIVE PLAN AT HOWARD ST. / MEZZANINE LEVEL SCALE 1/32"= 1'-0"

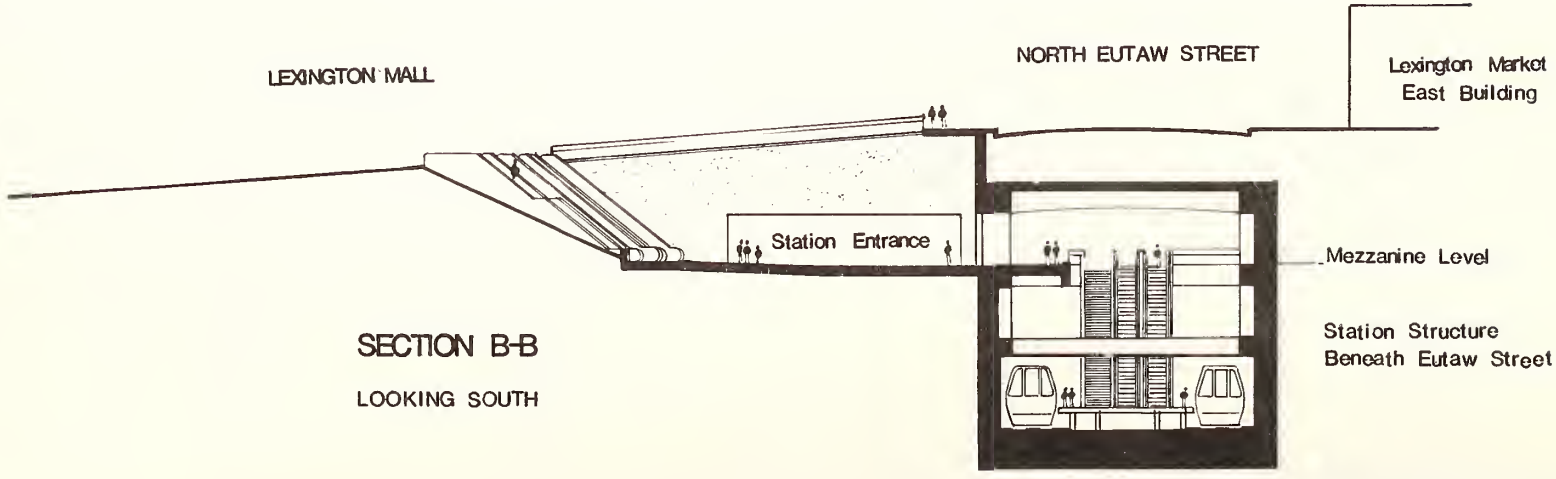


CITY OF BALTIMORE : THE LEXINGTON MARKET STATION
JOINT DEVELOPMENT PROJECT

FIGURE 3-9

LEXINGTON MARKET STATION SOUTHEAST ENTRANCE
PHASE ONE SITE AREA AND 1ST PHASE DESIGN DEVELOPMENT BY MTA
ILLUSTRATIVE PLAN AT LEXINGTON MALL LEVEL





CITY OF BALTIMORE : THE LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT

FIGURE 3-10

LEXINGTON MARKET STATION SOUTHEAST ENTRANCE
PHASE ONE SITE AREA AND IST PHASE DESIGN DEVELOPMENT BY MTA
ILLUSTRATIVE CROSS SECTIONS

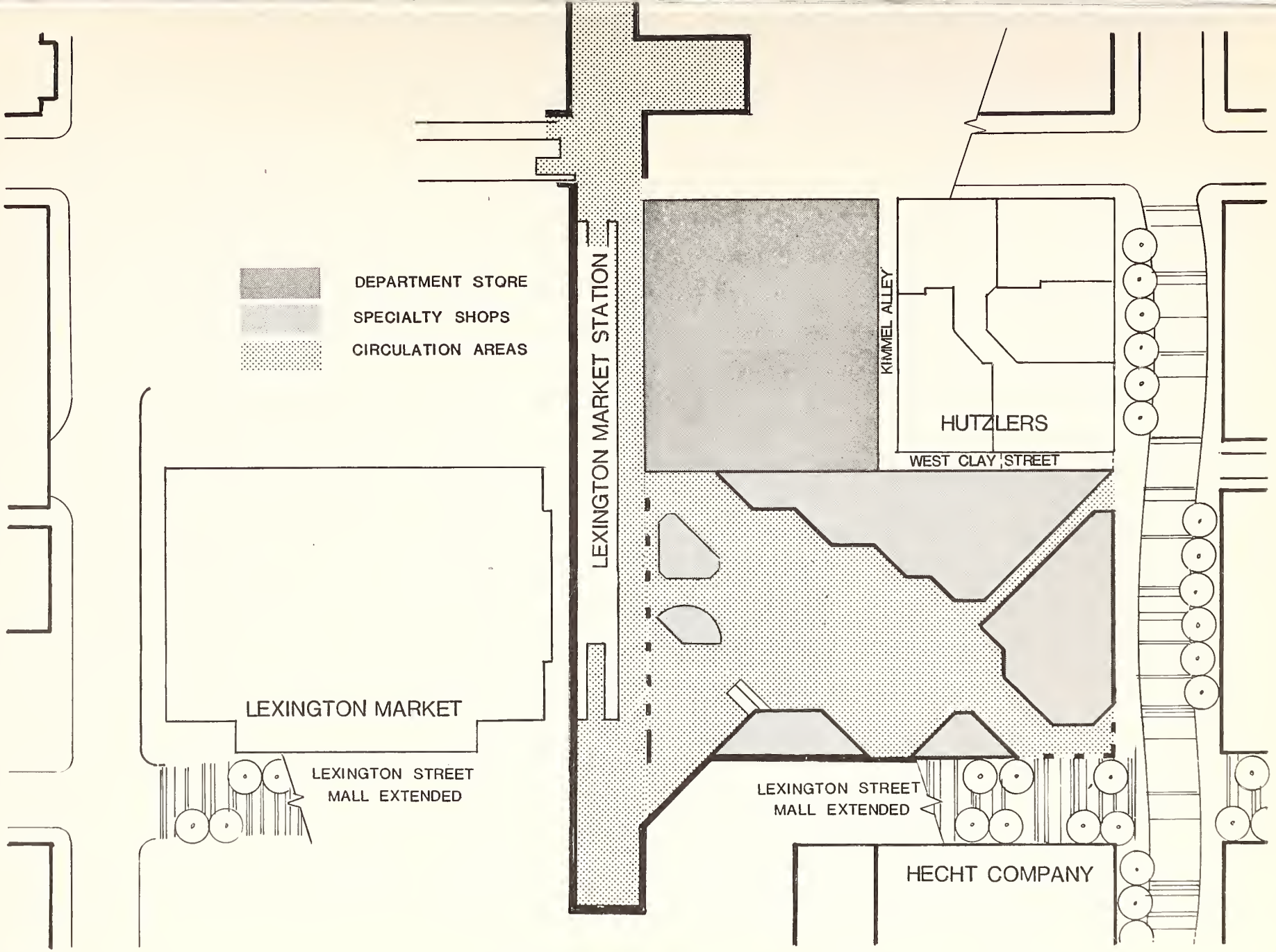


Diagram Of Proposed Enlargement Of The Southeast Entrance Plaza

SCALE 1" = 100' FIGURE 3-10A

Baltimore and the private developer (or developers) selected for the joint development project.

While the placement of the southeast entrance in the bed of Lexington Street is feasible, it was deemed imprudent in view of the purposes of the proposed action. The relocation of the entrance facilities within the project site area is proposed in order:

(1) To establish the public conditions necessary for economically feasible private development within the proposed project site area, and to simultaneously enhance the ridership potential of the Lexington Market Rapid Transit Station

The original location would have resulted in transit riders entering and leaving the entrance location bypassing the western half (Kimmel Alley to Eutaw Street) of the project site area completely, and not passing directly through the eastern portion of the site area, which is considered to have the greatest potential for maximum, intensive retail activity and development. The original location, as a result, did not make a direct contribution to the revitalization of the project site. One essential purpose of the combined transit/retail development plan is to draw transit patrons directly into and through the new environment of the proposed shopping galleria. The success of this fundamental principle has been demonstrated in the development of transit systems throughout the world (Toronto's Eaton Centre, Montreal's Place Bonaventure, Paris' La Defence, the CitiCorp Center in New York, and the Gallery at Market Street East in Philadelphia). Conversely, the economic consultant for the Baltimore Gardens project, Robert J. Harmon and Associates, has estimated that 800 additional transit patrons per day can be expected to use the Lexington Market Station as a result of integrating the southeast entrance directly with the project's retail galleria development. The Robert J. Harmon and Associates technical memorandum is available for inspection. Consequently, it has been deemed prudent, both in view of the magnitude of the investment ($721 million) being made in the Phase I/Section A transit system and the Lexington Market Station (approximately $30 million), and in view of the seriously deteriorating character of the retail district, to emphasize this directly supportive relationship for both community revitalization and increased ridership.

(2) To reduce the disruptive effects of subway construction along the existing Lexington Street pedestrian corridor

The construction of the originally planned southeast entrance in the bed of Lexington Street would have seriously disruptive effects on pedestrian flow through the 300 block of West Lexington Street. The MTA's construction plan for this facility would require extensive utility (primarily storm drain, sewer, and mechanical/electrical vaults) relocation within this block, in order to construct the portions of the entrance structure between street grade and the station mezzanine below Eutaw Street. Construction plans required the effective closing of this block for a four year period to both vehicular and pedestrian traffic, leaving provision for only a continuous six foot temporary sidewalk along the north side of the street, and a single 11 foot wide service lane for vehicles through the construction zone. A discontinuous six foot temporary sidewalk would be provided along the south edge of this block. These construction consequences of the Lexington Street location are deemed imprudent due to (1) their adverse effect on the Lexington Market, which receives the preponderance of its lunch hour business from pedestrians walking to it across Lexington Street from the Charles Center area, and (2) their adverse effect on remaining businesses along the south sides of the 300 and 400 blocks of West Lexington Street, and the 100 block of North Eutaw Street. The relocation of the entrance to the Baltimore Gardens site, although it does require redevelopment, does avoid the fullest extent of this disruption to Lexington Street.

(3) To avoid foreclosing the future opportunity for small-scale transit shuttle service along the proposed extension of the Lexington Street pedestrian mall

The social and economic success of efforts to revitalize the City's retail district requires the strengthening of its transportation linkages with other sectors of the central business district, primarily with office concentrations in the Charles Center and Financial District areas; the growing concentration of office, retail, recreational, tourist, convention and residential uses in the Inner Harbor area; and institutional centers such as the University of Maryland at Baltimore downtown campus, the Social Security Administration office center, and the Maryland State Office Complex to the west and north. These areas are physically separated from the retail district by distances which are greater than those which can be accomplished

by normal pedestrian walking trips. The limited configuration of Phase I/Section A rapid transit project stations under construction in the downtown area (the Bolton Hill Station adjacent to the Maryland State Office Complex; the Lexington Market Station in the retail district; and the Charles Center Station in the City's Financial District), and the high-speed regional commutation character of that project, renders it insufficient for this purpose. In addition, the Phase I/ Section A rapid transit project does not directly serve the Inner Harbor area, and does not provide transit connections between it and the retail district. A major recommendation of the Retail District Revitalization Study of 1974 - 76, made by Real Estate Research Corporation, was for an expansion of smaller-scale transit shuttle service within the downtown area, greatly increasing the accessibility of the retail district from other CBD activity centers. During the Fall of 1975, the City and the Greater Baltimore Committee began a major study of the feasibility of installing a "Downtown People Mover" in the downtown area. Additional alternative alignments were studied by the Downtown People Mover Task Force and each of the alignments proposed for further technical study by the Task Force made use of the Lexington Mall (both then-existing and committed future segments) between Charles Center and the Lexington Market Authority facilities.

In addition to its commitment to pursue a complete technical, architectural, and engineering feasibility study for a permanent Downtown People Mover installation, the City has also initiated technical studies of the potential for grade-level transit shuttle service connecting these activity areas. While the final outcome of these feasibility studies cannot be predicted, it is the policy of the City to take every reasonable public measure to ensure the availability of a feasible future right-of-way for such transit shuttle service within affected areas subject to its own proposed public redevelopment project activities.

The construction of the entrance facility in Lexington Street would foreclose the future use of the Lexington Street Mall extension for transit shuttle vehicle activity. The effective width of Lexington Street is 67 feet; the placement of a 30 foot wide entrance parapet in this 67 foot dimension would prevent an acceptable design for both pedestrian and transit shuttle movement in the remaining space. Any possible future DPM installation would probably take the form of a small scale elevated guideway above the Mall, and the placement of subway entrance parapets beneath such an elevated guideway structure would be aesthetically and functionally undesirable.

3.7 The Action Alternatives: Definition of Common Project Activities

Pursuant to the proposed change in location for the south-east transit entrance facilities, as described in Section 3.6, four action alternatives, and one sub-alternative, have been developed for the proposed project. They are:

Scheme A, which illustrates a development pattern based on the maximum retention of existing structures;

Scheme B, which illustrates a development pattern based on the partial retention of existing structures;

Scheme B-1, a variant of Scheme B;

Scheme C, which illustrates a development pattern based on medium density new development; and,

Scheme D, which illustrates a development pattern based on higher intensity of new development.

Each of the five alternatives is illustrated with: (a) an illustrative site-plan showing area-wide relationships in the larger retail district;(b) plan diagrams of general floor layouts for the proposed project site area, at the Howard Street/ transit station mezzanine level, at the Lexington Mall (mid-block) level, at the Eutaw Street level, and at a Paca Street, or upper level; and (c) illustrative streetscape elevations of each of the four block faces of the block containing joint public/ private portions of the project site area.

Each of the alternatives is illustrative, and is intended to convey only general and diagrammatic development relationships. With the exception of public construction elements identified in this EIS, which will be designed under direct contract to the MTA or the City, specific architectural designs will be commissioned by the private developer or developers selected for this project.

Each of the development alternatives is intended to portray development patterns which can be expected to be present within the project site area and its environs by 1985, three years after the scheduled opening of the Phase I/Section A rapid transit line.

The following project activities are common to each of the action alternatives:

(1) construction of the southeast entrance facilities at the proposed new location within the project site;

(2) public acquisition of all privately-owned properties within the project area;

(3) business relocation of all existing retail establishments, presently located within the proposed project stie area, in compliance with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, to desired new locations outside the proposed project site area;

(4) construction of a two-block extension of the Lexington Street Mall, from Howard to Paca Streets; and,

(5) disposition of development rights to designated portions of the project site area, by sale or lease, to selected private development entities at the highest obtainable price established by professional re-use appraisals.

3.8 The Scheme A Alternative: Maximum Retention of Existing Structures

Figure 3 - 11 is an illustrative site plan of the Scheme A alternative in the context of the larger Baltimore Retail District. It also illustrates the two-block extension of the Lexington Street Mall.

Scheme A emphasizes the retention of existing structures within the project site area, particularly those which have frontages on the streetscape edges of the site. Scheme A includes two significant areas of demolition: (1) the demolition previously undertaken by the Mass Transit Administration within the portion of the project site area bounded by Saratoga Street, Kimmel Alley, Clay Street, and Eutaw Street, which included all structures within this area except for 223 North Eutaw Street (Arthur's Bakery) and 221 North Eutaw Street; and (2) the demolition of two major existing structures within the central portions of the remaining site area to provide for a connecting shopping concourse and circulation plaza.

Scheme A includes the following general space allocations by project site sub-area:

(1) Development Area 1: for the portion of the project site area bounded by Clay Street, Howard Street, Lexington Street and Eutaw Street (approximately 69,000 square feet of land area): the south-east transit station public entrance plaza, to be constructed by the MTA, and its extension as a public improvement component of the transit joint development project, consisting of approximately 25 - 30,000 square feet of floor area; 14 - 16,000 square feet of floor area of new specialty retail space; 50 - 60,000 square feet of floor area of renovated specialty retail space; and

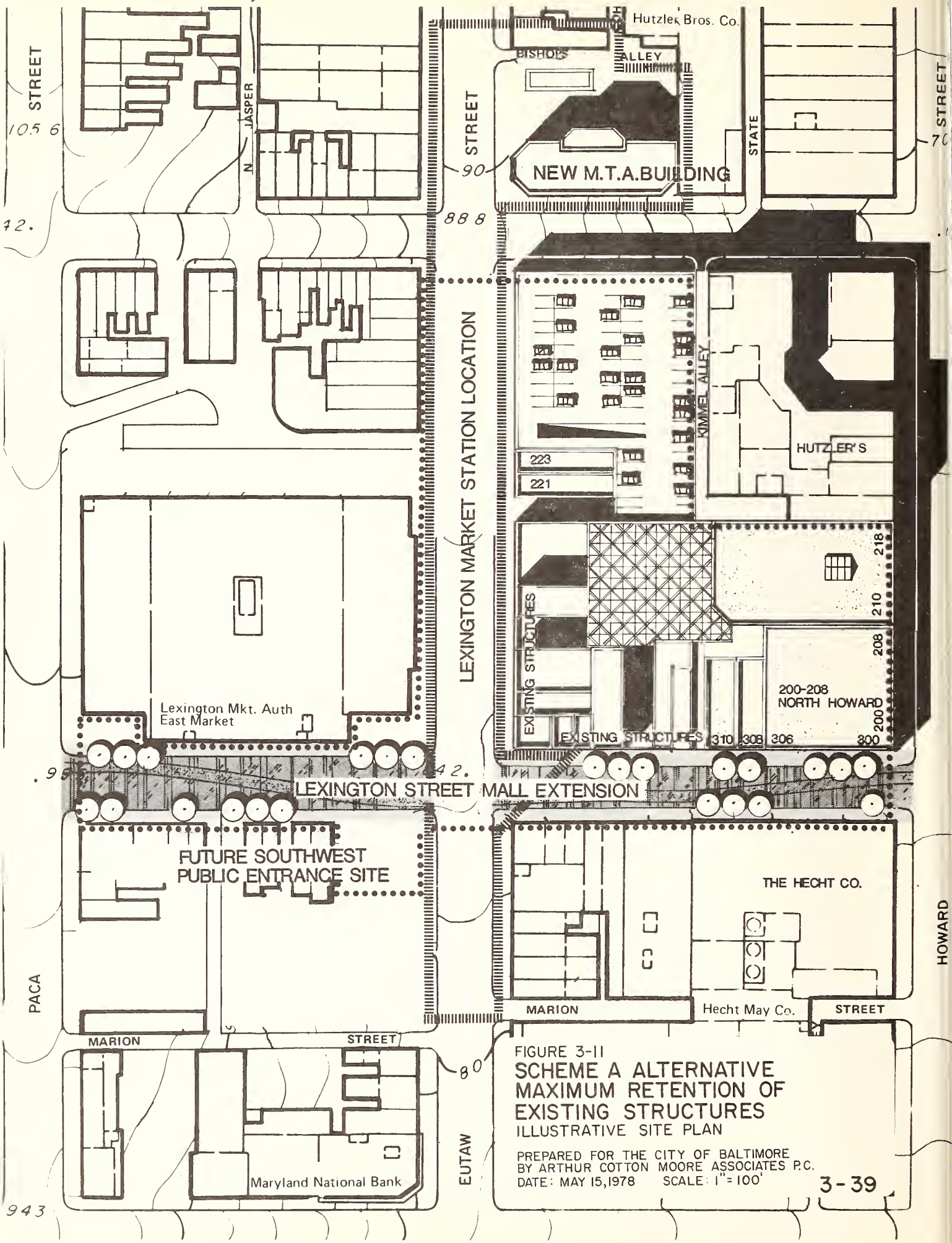


FIGURE 3-11

SCHEME A ALTERNATIVE MAXIMUM RETENTION OF EXISTING STRUCTURES

ILLUSTRATIVE SITE PLAN

PREPARED FOR THE CITY OF BALTIMORE
BY ARTHUR COTTON MOORE ASSOCIATES P.C.
DATE: MAY 15, 1978 SCALE: 1" = 100'

60-120,000 square feet of floor area of renovated office space, all at varying floor levels within the upper stories of the existing structures on the site.

(2) Development Area 2: for the portion of the project site area bounded by Clay Street, Eutaw Street, Saratoga Street, and Kimmel Alley, and including the bed of Clay Street between Eutaw Street and Kimmel Alley (approximately 35,000 square feet of land area): 60-90,000 square feet of floor area of new department store space; 150-200 new parking spaces; and the retention of the structures at 221 and 223 North Eutaw Street.

The preliminary estimate of the total public and private development costs required to accomplish the Scheme A alternative within the project site area is between $18-20 million. This cost figure does not include the future private developer's costs for interior finishing of space to be leased, or for tenant's allowances for tenant installed finishes. The projected cost figure also does not include the public cost of constructing the extension of the Lexington Street Mall, or the cost to the Mass Transit Administration of constructing the initial portions of the southeast public entrance plaza for the transit station.

Scheme A depicts the adaptive re-use and radical structural reworking of nineteen existing structures, and the construction of a new galleria concourse at the center of the site, in an effort to create a retail and office complex which is attractive to retail and office tenants and shoppers, and economically feasible in terms of minimum requirements for private investment and development.

The development illustrated for Scheme A is directly connected to the Lexington Market rapid transit station via construction of the southeast entrance on the joint development site. An extraordinarily complex underpinning and building support/reconstruction process is required to retain the eight existing structures at 324-330 West Lexington Street and 201-219 North Eutaw Street above the excavation required for the southeast entrance plaza to be constructed in this portion of the site area. The sequence of underpinning excavation; installation of supporting columns and needles; removal of existing

grade-level floors; insertion of post-tension beams to support existing structural (party) walls; excavation (by the MTA contractor) to subway mezzanine level for construction of the transit entrance plaza; and final construction of new first floor slabs for the retained structures, would be both time consuming and costly. It has been estimated that the total process of precise engineering investigation, survey, measurement and design; contract and specification preparation; code inspection and approval; bidding; demolition of the central portions of the project site (immediate demolition of all portions of 320-322 West Lexington Street, with the exception of its Lexington Street facade, and subsequent demolition of the structure at 317-323 West Clay Street) for contractors access for underpinning and installation of post tension cables and beams; and actual construction of the first three steps of the operation would require a minimum period of one year for execution. The total cost of accomplishing these steps has been estimated to be $3,477,000, exclusive of additional costs to the Mass Transit Administration.

SCHEME A
Estimated Cost of Retaining Existing Buildings

Item	Cost
Engineering Costs	$ 115,000
Facade Preservation (320-322 W. Lexington St.)	27,000
Building Demolition (317-323 W. Clay St.) (320-322 W. Lexington St.)	200,000
Construct Underpinning Piers	950,000
Construct Underpinning Beams	520,000
Construct First Floor Slab (all buildings)	120,000
Entrance Redesign	265,000
Connection - Station to Retail Space	120,000
Contractor Delay Costs	1,060,000
Restricted Access for Finish Contract	100,000
TOTAL -	$3,477,000

In addition to the complex construction process required to accomplish the retention of these structures above the proposed transit entrance, the end result would be in serious conflict with the design of the station structure now under construction. The alignment and location of the structural walls of the buildings above must determine the location of the necessary supporting columns below. As these structural walls are not regularly spaced (due to the differing widths of the six structures which face Eutaw Street), they do not match the locations of the knock-out panel openings in the station wall below. The majority of the supporting columns resulting from the building support sequence, would block the openings in the station entrance wall. In addition, the massiveness of the required post-tension beams required

to support the buildings would result in a subway entrance connection of negative aesthetic character.

The upper levels of the retained eight structures at 210-219 North Eutaw Street do not have matching floor levels. The floor levels of retained structures at 326, 324, 320-322, 316-318, 314 and 312 West Lexington Street, due to the location of these buildings on a sloping street, have widely divergent floor levels. Regardless of best efforts which would be made to provide vertical circulation facilities for the buildings and to overcome clumsy floor level transitions, it is anticipated that these spaces, then as now, would be largely unleasable for uses other than storage.

Scheme A, like Schemes B, C and D, requires public acquisition of all privately owned properties within the proposed project site area, and the relocation of all present business occupants and tenants from the properties acquired. In the case of Scheme A, this is because the ground floors of the Eutaw Street properties (as well as 328-330, 326, and 324 West Lexington Street) must be removed for the underpinning operations described above. Scheme A requires the demolition of 320-322 West Lexington Street, in order to provide contractor's access for the underpinning of the Eutaw Street buildings described above. It further requires substantial reconstruction of 316-318, 314, and 312 West Lexington Street in order to attempt to return their upper levels to any active use; this would include provisions for escalators, elevators, and other vertical circulation elements.

Scheme A has not been selected as a preferred alternative due to the extraordinarily costly and complex measures required to retain the structures in the portion of the site area bounded by Eutaw Street, Clay Street, Kimmel Alley, and Lexington Street, the resulting negative character of the transit entrance plaza, and the infeasibility of successfully reusing the upper levels of the retained buildings for active retail or office use. It is also noted in Chapter 6.0 of this EIS that these structures, with the exceptions of the facades of 320-322 West Lexington Street and 203-205 North Eutaw Street, do not possess significant architectural or historic value. The building at 316-318 West Lexington would be retained under this alternative. Properties east of Kimmel Alley would also be retained under Scheme A.

The primary difference between Scheme A and Scheme B (described below) is the retention in Scheme A of the buildings described above. Given the economic infeasibility of successful adaptive reuse of these buildings, the economic consequences of Scheme A would be similar to those of the No-Action Scheme described earlier in this chapter.

3.9 The Scheme B Alternative: Partial Retention of Existing Structures

Figure 3 - 12 is an illustrative site plan of the Scheme B alternative in the context of the larger downtown Retail District. It also illustrates the two-block extension of the Lexington Street Mall.

Scheme B depicts new construction and development throughout the portion of the project site area bounded by Saratoga Street, Kimmel Alley, Lexington Street, and Eutaw Street. It requires the demolition of the following existing structures:

1. 312 West Lexington Street,
2. 314 West Lexington Street,
3. 316-318 West Lexington Street (with retention of its Lexington Street facade),
4. 320-322 West Lexington Street (with retention of its Lexington Street facade),
5. 324 West Lexington Street,
6. 326 West Lexington Street,
7. 328-330 West Lexington Street,
8. 201 North Eutaw Street,
9. 203-205 North Eutaw Street (with extensive documentation of its facade),
10. 207-209 North Eutaw Street,
11. 211 North Eutaw Street,
12. 213-219 North Eutaw Street,
13. 221 North Eutaw Street
14. 308 West Lexington Street, and
15. 310 West Lexington Street.

It further proposes the physical relocation of the original portion (above Eutaw Street grade-level) of 223 North Eutaw Street (Arthur's Bakery) to one of two possible appropriate relocation sites in the 400 block of West Saratoga Street, as illustrated in Figure 3 - 12.

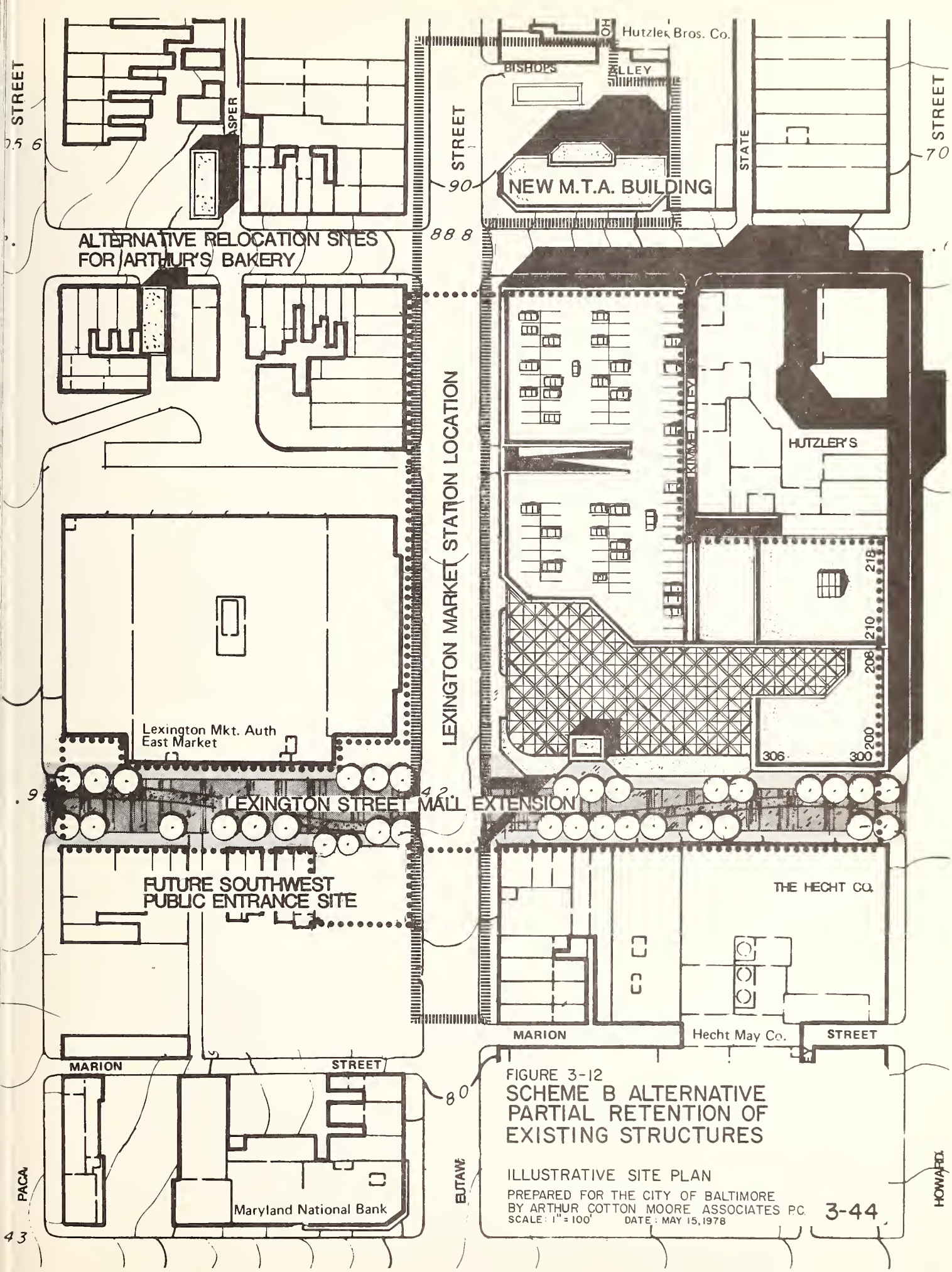


FIGURE 3-12
SCHEME B ALTERNATIVE
PARTIAL RETENTION OF
EXISTING STRUCTURES

ILLUSTRATIVE SITE PLAN

PREPARED FOR THE CITY OF BALTIMORE
BY ARTHUR COTTON MOORE ASSOCIATES P.C.
SCALE: 1" = 100' DATE: MAY 15, 1978

Scheme B illustrates the retention and recylcing of substantial portions of the existing structures within the portion of the project site area bounded by Kimmel Alley, Clay Street, Howard Street, and Lexington Street. These include 210-218 North Howard Street (the Hutzler's Department Store South, or "Palace", Building) and 300-306 West Lexington Street/200-208 North Howard Street (a complex of interconnected and structurally redesigned buildings which comprise the former Hochschild-Kohn and Company Department Store "Main" building complex).

Scheme B includes the following general space allocations by project site sub-area:

(1) Development Area 1: for the portion of the project site area bounded by Clay Street, Howard Street, Lexington Street and Eutaw Street (approximately 69,000 square feet of land area, including the bed of Kimmel Alley between Clay Street and Lexington Street): the southeast transit station public entrance plaza, to be constructed by the MTA, and its extension as a public improvement component of the transit joint development project, consisting of approximately 25-30,000 square feet of floor area; approximately 25-45,000 square feet of floor area of new specialty retail space, and 40-50,000 square feet of floor area of renovated retail space; and approximately 60-120,000 square feet of floor area of renovated office space in the upper four floor-levels of the structures shown as retained along Howard Street. The lower two levels of the retained structures are illustrated as structurally rebuilt with ramps, atriums, and public concourses to provide attractive and leaseable retail space. Three levels of new specialty retail space are shown for new construction in the portion of this area bounded by Kimmel Alley, Lexington Street, Eutaw Street and Clay Street, connected to, and ringing,the proposed transit station entrance plaza and its extension.

(2) Development Area 2: for the portion of the project site area bounded by Clay Street, Eutaw Street, Saratoga Street, and Kimmel Alley (approximately 35,000 square feet of land area, including the

existing bed of Clay Street between Eutaw Street and Kimmel Alley): approximately 80-120,000 square feet of new department store and retail space, and between 250-350 new parking spaces, within structure, on several levels.

The preliminary estimate of the total public and private development costs required to accomplish the Scheme B development plan within these two portions of the project site area is $18-20 million. This cost figure does not include the future private developer's costs for interior finishing of space to be leased, or for tenant's allowances for tenant-installed finishes. As in the case of Scheme A, the projected cost figures also do not include the public cost of the Lexington Mall extension, or MTA costs in connection with the southeast transit entrance.

Scheme B illustrates the retention of the facades of 320-322 West Lexington Street (the "Murphy" Building) and 316-318 West Lexington Street at their present locations. The preliminary cost estimate for retaining these facades in place during construction, by erecting bracing buttresses along the Lexington Street sidewalk, is between $180-260,000.

Scheme B depicts the adaptive re-use of the Howard Street buildings for specialty retail and office tenancies. In order to adapt these structures for these uses, an extensive program of structural redesign is necessary.

Due to the large floor areas within these six story structures (approximately 30,000 square feet per floor, combining the major structures east of Kimmel Alley), and the absence of exposure to natural light within 80% of this space, Figure 3 - 12 illustrates the introduction of glass roof and atrium elements at two points to provide minimum daylighting standards for leaseable office space.

The Hochschild-Kohn complex is an assemblage of older structures and floor additions constructed between the latter part of the nineteenth century and 1916, and periodically re-modelled and adapted for department store use between 1916 and 1977.

Hochschild-Kohn and Company terminated business operations in this complex in August 1977, citing rapidly declining sales and an obsolete and poorly laid-out physical plant as its reasons. The building complex, which includes a utility and warehouse/work area building at 317-323 West Clay Street, contains approximately 200,000 gross square feet of floor area on seven levels.

The complex is characterized by irregular floor layouts and by dense and irregular column spacings, as a result of the incorporation of portions of older structures. Column spacings vary from eight (8) feet to twenty-four (24) feet in the east-west direction (the average spacing is approximately eighteen (18) feet)and is generally consistent at approximately twenty (20) feet in the north-south direction.

The complex is viewed as functionally obsolete for continued use for major retailing purposes.

Retention of the Howard Street buildings would require far-reaching structural redesign and alteration to permit these structures, in combination, to function within a successful specialty retailing center.

The additional elements of reconstruction proposed in Scheme B for the Hochschild-Kohn and Hutzler's buildings are as follows:

a. Selective Demolition to create mezzanine level arcades through the two buildings.	$ 40-50,000
b. Selective Demolition to create an atrium for office space use on the upper levels of 200-208 North Howard Street.	$ 50-60,000
c. Clean-up, repair, repoint, decorate and reglaze facades.	$ 50-60,000
d. Re-create 2 level entrance to 212-218 North Howard Street.	$ 30-40,000
e. Glass roof to atrium.	$250-300,000
f. Mechanical and electrical for atrium element	$200-250,000
TOTAL	$620-760,000

Consequently, the structural repair, structural preparation, and structural reconfiguration costs of preparing the Howard Street buildings for renovation and re-use are in excess of $600,000. These costs are over and above the normal development costs which are acceptable to a private developer seeking a normal return on his investment, and would invariably be viewed by a developer as public sector "infrastructure" or "development packaging" costs. They further assume the structural adequacy of the footings for the 200-208 North Howard complex of buildings.

Scheme B has not been selected as a preferred alternative due to the extraordinary structural reconfiguration costs required to transform the Howard Street buildings for contemporary retailing and office use.

The primary difference between Scheme B and Scheme C (described below) is the retention in Scheme B of substantially the entire interiors (floors, columns, footings, elevators, escalators, mechanical and electrical system elements, and portions of roof structures) of the 200-208 and 210-218 North Howard Street buildings. Given the economic infeasibility of successfully adapting these structures for a significantly higher economic re-use, it has been concluded that the economic consequences of Scheme B are also similar to those of the No-Action Scheme described earlier in this chapter.

3.10 The Scheme B-1 Sub-Alternative: Retention of the Hutzler's South, or Palace Building (210-218 North Howard Street)

A sub-alternative under Scheme B has been identified which would retain all or substantial portions of the existing Hutzler's South, or Palace, Building at 210-218 North Howard Street for incorporation in the final development plan for the project site area. Scheme B-1 is illustrated in Figure 3 - 13. Scheme B-1 was identified as a valid sub-alternative, but only contingent upon final design and development feasibility studies to be conducted jointly by the City and the future developer to be selected by the City, because:

(a) The Historic Preservation Consultant has identified the 210-218 North Howard Street building as possessing the highest degree of architectural and historical significance among all of the existing buildings located within the project site area.

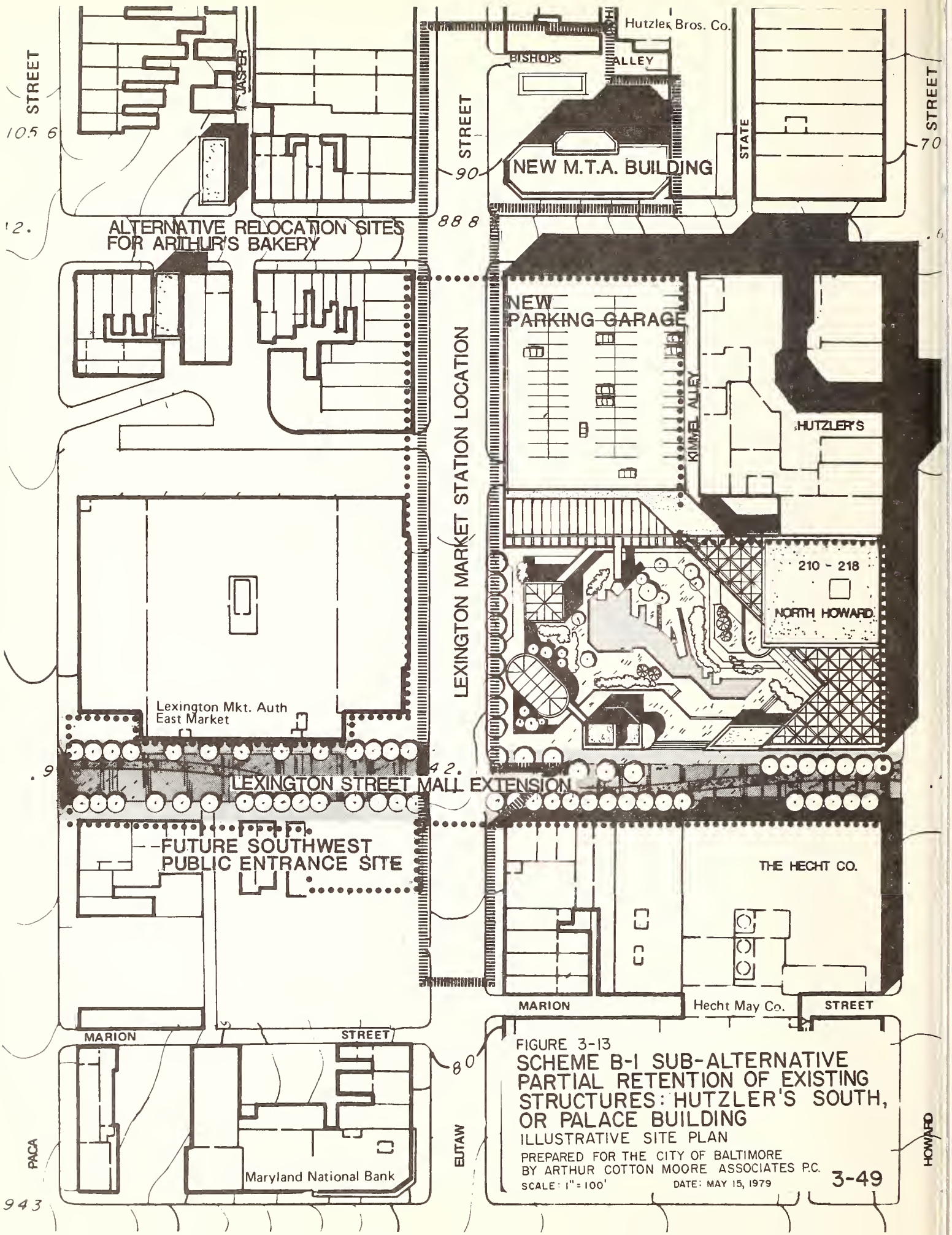


FIGURE 3-13

SCHEME B-1 SUB-ALTERNATIVE
PARTIAL RETENTION OF EXISTING
STRUCTURES: HUTZLER'S SOUTH,
OR PALACE BUILDING

ILLUSTRATIVE SITE PLAN

PREPARED FOR THE CITY OF BALTIMORE
BY ARTHUR COTTON MOORE ASSOCIATES P.C.

SCALE: 1" = 100' DATE: MAY 15, 1979

(b) The building at 210-218 North Howard Street has some potential for serving as a continuing connecting link between the Hutzler's Department Store Complex north of Clay Street and the new retail facilities to be developed within the project site area.

In view of the need to ensure the final development feasibility of the private development components of the proposed project, no final determination can be made at this time as to the retention of this structure, or its incorporation in the final development plan for the project site. Consequently, Scheme B-1 has not been identified as a prudent alternative and, for the purposes of fulfilling the environmental impact assessment requirements for the proposed action, is not considered as a preferred alternative in this EIS.

3.11 The Scheme C. Alternative: Medium Density New Development

Figure 3-14 is an illustrative site plan of the Scheme C alternative in the context of the larger downtown Retail District. It also illustrates the two-block extension of the Lexington Street Mall.

Scheme C illustrates new construction and development throughout the entire proposed project site area. As in Scheme B, the original portion of the Arthur's Bakery building at 223 North Eutaw Street is relocated to an appropriate site outside the project area, and two possible relocation sites are identified in the 400 block of West Saratoga Street. As in Scheme B also, Scheme C proposes the demolition of all existing structures within the portions of the project area west of Kimmel Alley but provides for the retention of facades subject to feasibility studies. In addition, Scheme C proposes the demolition of:

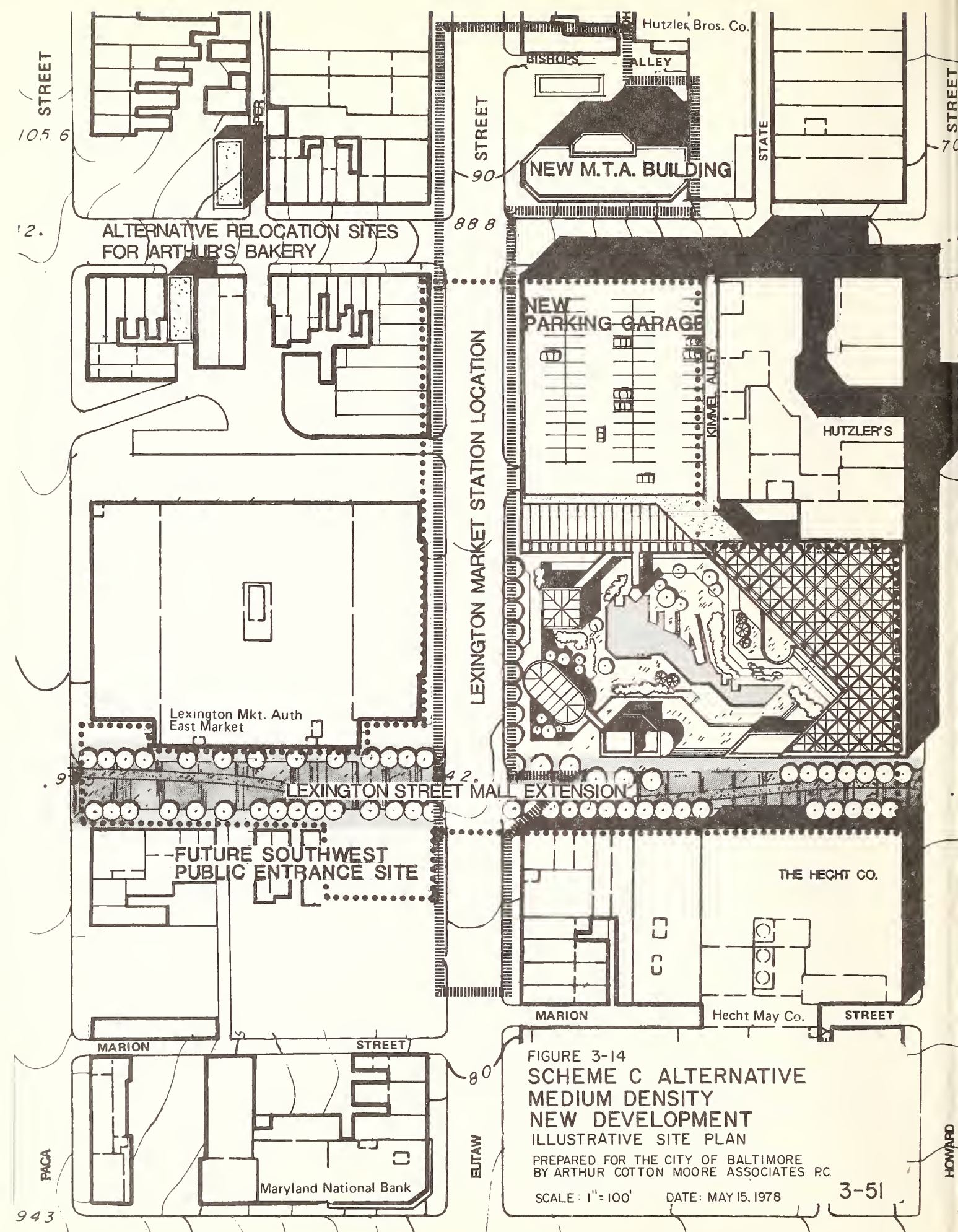


FIGURE 3-14

SCHEME C ALTERNATIVE MEDIUM DENSITY NEW DEVELOPMENT

ILLUSTRATIVE SITE PLAN

PREPARED FOR THE CITY OF BALTIMORE
BY ARTHUR COTTON MOORE ASSOCIATES P.C.

SCALE: 1"= 100' DATE: MAY 15, 1978

1. 306-304 West Lexington Street and 200-208 North Howard Street, the former Hochschild-Kohn Department Store "Main" building complex (with provision for the possible retention of the Lexington Street and Howard Street facades of these buildings), and

2. 210-218 North Howard Street, the Hutzler's Department Store South, or "Palace", Building (with provision for the possible retention of the Howard Street facade of this building).

Scheme C includes the following general space allocations by project site sub-area:

(1) Development Area 1: for the portion of the project site area bounded by Clay Street, Howard Street, Lexington Street, and Eutaw Street (approximately 69,000 square feet of land area, including the bed of Kimmel Alley between Clay Street and Lexington Street): the southeast transit station public entrance plaza, to be constructed by the MTA, and its extension as a public improvement component of the transit joint development project, consisting of a minimum of approximately 25-30,000 square feet of floor area; approximately 75-100,000 square feet of floor area of new specialty retail space on three levels; and approximately 60,000 square feet of entertainment space distributed on two upper levels.

(2) Development Area 2: for the portion of the project site area bounded by Clay Street, Eutaw Street, Saratoga Street, and Kimmel Alley, (approximately 35,000 square feet of land area, including the present bed of Clay Street between Eutaw Street and Kimmel Alley): approximately 80-120,000 square feet of new department store and retail space, and between 250 and 350 new parking spaces, within structure, on several levels.

The preliminary estimate of the basic public and private development costs required to accomplish the Scheme C development

alternative is approximately $18-25 million. As in Schemes A and B, this "rough" cost projection does not include specific finishing costs, the cost of the Lexington Mall, or the cost of MTA construction for the southeast entrance plaza.

As in Scheme B, Scheme C provides for the retention of the facades of 316-318 West Lexington Street and 320-322 West Lexington Street. Scheme C continues the traditional massing and scale of building development at the intersection of Howard and Lexington Streets, the historical "100% corner" for retailing in downtown Baltimore. Subject to more detailed cost and technical feasibility studies to be conducted by the City of Baltimore and the selected private developer for the joint development project, it provides for the retention of the Lexington and Howard Street facades of the original portions of the former Hochschild-Kohn and Company Department Store Main building complex (300-306 West Lexington Street and 200-208 North Howard Street) and the Howard Street facade of the Hutzler's Department Store South, or Palace, Building (210-218 North Howard).

The preliminary engineering cost estimate to retain these facades in place during construction, by erecting temporary bracing structures along the Lexington Street and Howard Street sidewalks, is between $800,000-1,000,000.

Scheme C is organized around the principle of creating a major open space, or civic plaza, within the retail district. The "open space principle" was earlier a formative principle in the development of Charles Center, and has been a guiding factor in the successful development of the City's Inner Harbor area. In essence, it seeks to create a focus for new development, and an amenity basis for new retailing, recreational, and entertainment activities.

Scheme C combines the open space principle with the dynamics of the Lexington Market transit station, the full potential of the Lexington Mall, and the organizational principles of the contemporary shopping mall. In combination, the plaza, the active

retailing elements which are placed within and around it, and the specialty shopping mall proposed as the Howard Street anchor of the site, become the "shopping mall" which reintegrate the linkages between the Lexington Market and the major remaining department stores at the north, east, and south edges of the site. Specialty shopping is arrayed at three levels along the Lexington, Howard, and Clay Street edges of the site, corresponding to the natural elevations of Howard Street, the Lexington Mall (taken at Kimmel Alley, or approximately at mid-block between Howard and Eutaw Streets), Eutaw Street, and Paca Street. These levels correspond with floor levels in the adjacent major stores and with the mezzanine level in the Lexington Market. Scheme C illustrates second-level connections to the Lexington Market and to stores east and south of the Howard and Lexington 100% corner. This is discussed further in Section 4.2 of this EIS, entitled Secondary Development Concepts.

The joint development plan has been conceived as a catalyst for the beginning of a larger revitalization program for the retail district.

As in Schemes A, B, B-1, and D the two-block extension of the Lexington Mall, from Howard to Paca Streets, is an integral element of the proposed transit joint development project which is the subject of this EIS. The project site area includes both the western block of this two-block extension and the parcel of land at 401-405 West Lexington Street. These elements are included in the proposed project site area for the following reasons:

(1) the Paca-to-Eutaw section of the proposed mall extension ties the Lexington Market to the joint development project, and the Lexington Market Station southeast entrance, during the early years of transit station and project activity;

(2) the parcel of land at 401-405 West Lexington Street, which is presently leased by the MTA as a contractor's work area, must be permanently reserved for the future development of the southwest entrance to the Lexington Market Station.

Ancillary to the Scheme C development alternative is a future, or "secondary development", concept for an extended pattern of public and private development south of the Lexington Market. This illustrative future concept, which also diagrammatically depicts the future southwest entrance, is presented in this EIS only as a reference to the possible secondary development" effects of the proposed action. Secondary Development effects are further discussed in Chapter 4 of this EIS.

Scheme C differs from Scheme B primarily in its approach to the retention or redevelopment of the structures along the Howard Street edge of the project site area, and in its use of the "open space principle" as a catalyst for the beginning of the revitalization of the retail district. Scheme C does not incorporate any portions of the existing interiors of the former Hochschild-Kohn Main Building Complex or the Hutzler's South, or Palace Building in the proposed development plan. It does provide for the retention of the facades of these structures, but only contingent upon specific negotiations, design studies, and agreements between the City and the future selected developer.

Scheme C was identified in the Draft EIS as one of two preferred alternatives for the proposed project. Scheme D, which is described in the following section, differs from Scheme C in that it proposes no on-site facade retention. It proposes a higher intensity of private development within the project site area.

Scheme C is viewed as a major upgrading of the image of the retail district, and a dramatic enhancement in the physical attractiveness of its public environment. It provides for immediate and future major upgradings to both Howard Street, adjacent to the proposed project site area, and to Lexington Street, within the proposed project site area. It provides for strong linkages to the Lexington Market transit station as part of the proposed action, and for additional future linkages between the station and the Lexington Market. It provides for immediate conditions which are requisite for future major enhancement and expansion of the Lexington Market itself.

By virtue of demonstrating a major public commitment to the upgrading of the retail district, is is anticipated that one "secondary development" consequence of Scheme C will be the enchancement of the marketability of Area 3B in Charles Center

for major new retailing use. Consequently, Scheme C anticipates the redevelopment of the Area 3B site for this purpose. The temporary ice-skating rink which now occupies this site is shown at a new permanent location south of the Lexington Market (which is shown illustratively as "secondary development" in this EIS; major portions of this site are now used by the MTA as contractor's work areas).

Scheme C is projected to have the following general effects on sales volumes within the retail district:

(1) it is anticipated to stabilize, and partially reverse, the decline in department store sales activity within the district;

(2) it provides two major sites for the possible addition of a new department store within the district (within the proposed project site area itself, and the Area 3B site in Charles Center), supported by the necessary public revitalization program necessary to make those sites marketable;

(3) it provides for the addition of upgraded new specialty shopping facilities at a location intended to take maximum advantage of the flow of pedestrians using the transit station, and to achieve effective retailing relationships with adjacent major stores.

3.12 The Scheme D. Alternative: Higher Intensity New Development

The Scheme D Alternative considers the highest level of development which could be accommodated on the project site, consistent with the City's overall development policies for the retail district. Figure 3-15 is an illustrative site plan of the Scheme D alternative in the context of the larger Retail District. It also illustrates the two-block extension of the Lexington Street Mall.

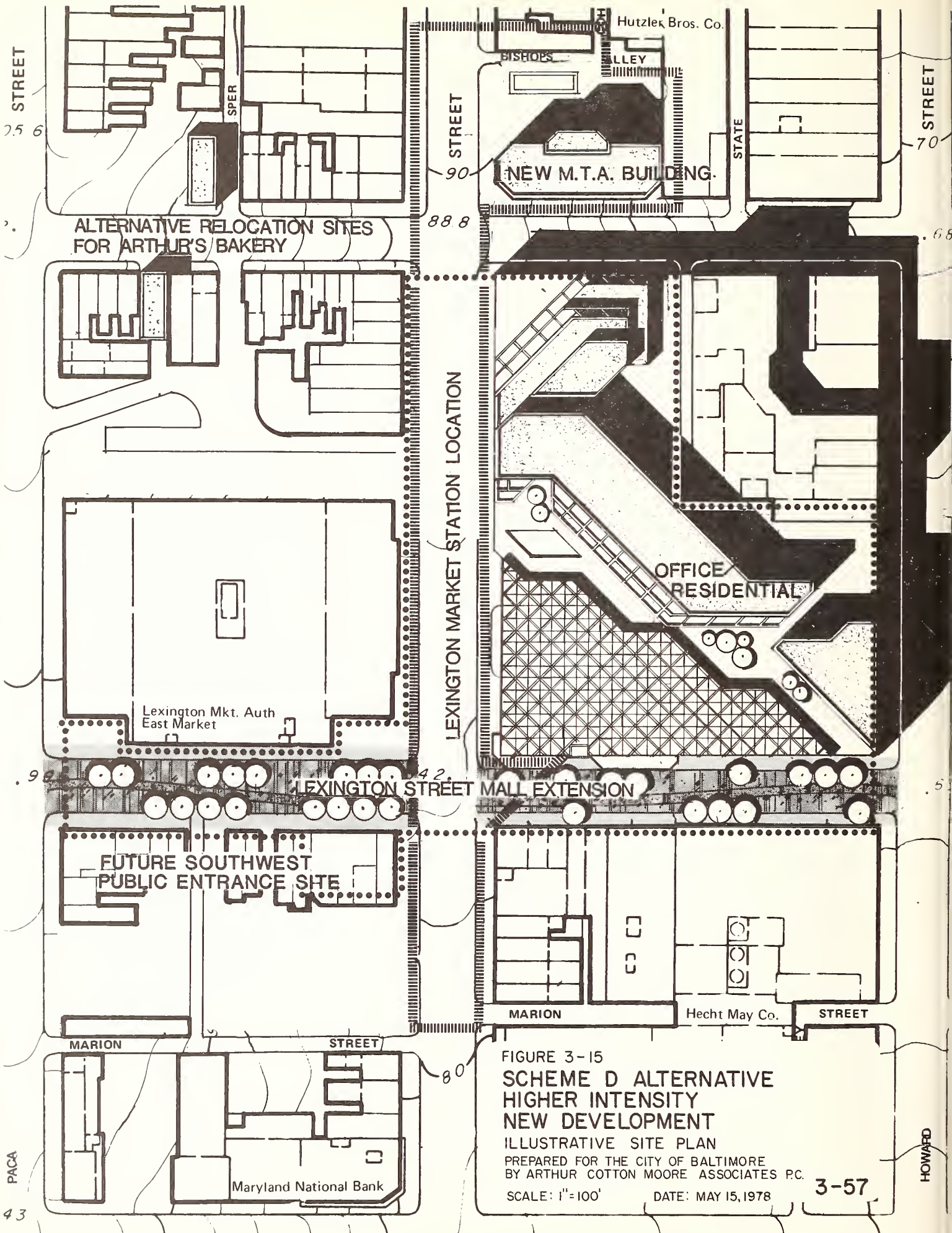


FIGURE 3-15

SCHEME D ALTERNATIVE HIGHER INTENSITY NEW DEVELOPMENT

ILLUSTRATIVE SITE PLAN

PREPARED FOR THE CITY OF BALTIMORE
BY ARTHUR COTTON MOORE ASSOCIATES P.C.

SCALE: 1"=100' DATE: MAY 15, 1978

Scheme D, like Scheme C, illustrates new construction and development throughout the entire proposed project site area. As in Schemes B and C, the original portion of the Arthur's Bakery building at 223 North Eutaw Street is physically relocated to an appropriate site outside the project site area; two recommended alternative relocation sites (shown in Figure 3 - 15), are identified in the 400 block of West Saratoga Street. Scheme D, like Scheme C, proposes the demolition of all other existing structures within the proposed project site area. Scheme D does not make provision for the on-site retention of the facades of 320-322 West Lexington, 316-318 West Lexington, 304-306 West Lexington, 200-208 North Howard, or 210-218 North Howard Street.

Scheme D includes the following general space allocations by project site sub-area:

(1) Development Area 1: for the portion of the project site area bounded by Clay Street, Howard Street, Lexington Street and Eutaw Street (approximately 69,000 square feet of land area, including the bed of Kimmel Alley between Clay Street and Lexington Street): the southeast transit station public entrance plaza, to be constructed by the MTA, and its extension as a public improvement component of the transit joint development project, consisting of approximately 15-25,000 square feet of floor area (the Scheme D mezzanine-level concourse is smaller than that of Scheme C, with proportionally greater amounts of private retailing development around its edges); 100-150,000 square feet of floor area, on three levels, of new specialty retail space; and approximately 60,000 square feet of floor area devoted to entertainment uses, on a fourth level.

(2) Development Area 2: for the portion of the site area bounded by Clay Street, Eutaw Street, Saratoga Street, and Kimmel Alley (approximately 35,000 sqaure feet of land area, including the present bed

of Clay Street between Eutaw Street and Kimmel Alley): 100-135,000 square feet of floor area of new retail or department store space, and approximately 400 on-site parking spaces, within structure, on several levels.

In addition, Scheme D projects up to 200,000 square feet of new office and/or residential development at higher levels within the project site area, and overlapping the two portions of the site described above.

The preliminary estimate of the basic public and private development costs required to accomplish the illustrative Scheme D development alternative is $25-35 million. As in the previous schemes, this "rough" costs projection does not include specific finishing costs, the public cost of the Lexington Mall extension, or the cost of MTA construction for the southeast entrance plaza.

As in all previous schemes, Scheme D continues the traditional massing and scale of building development at the intersection of Howard and Lexington Streets.

Scheme D projects a higher intensity of private development within the proposed project site area, adds the potential for significant office and/or residential mixed use development to the development program, and permits the selected future private developer, or developers, maximum flexibility in the final design and development of a building program for the project site. In that no existing building structures, elements, or facades are incorporated in this development alternative, the only givens for Scheme D are the initial portions of the southeast entrance plaza, to be designed and constructed by the MTA and the City, at the northeast corner of Eutaw and Lexington Streets (illustrated in Figure 3 - 7), and the two-block extension of the Lexington Street Mall.

As in Scheme C, design standards and controls for the development of the site, pursuant to legal requirements of the Retail District Urban Renewal Plan and Ordinance of the Mayor and City Council of Baltimore, will be incorporated in a Disposition Agreement between the City and the selected private developer. These design and development controls will:

(1) establish measures and limitations to protect the traditional massing and scale characteristics of the project site, particularly the integrity of the streetscape character of the Howard and Lexington Street intersection;

(2) regulate the permitted intensity and mixture of specific uses (retail, parking, office, residential, and pedestrian circulation space) throughout the project site; and

(3) specifically define design and development relationships between elements of private development and the southeast transit entrance plaza.

The "secondary" or future ancillary developments illustrated in conjunction with Scheme D are identical to those illustrated in conjunction with Scheme C, with the following additions:

(1) additional parking construction, in proportion to the higher intensity of development proposed for Scheme D, is proposed above the East Building of the Lexington Market;

(2) the possible future development of the site south of the Lexington Market is illustrated with a larger private development component; and,

(3) a larger second-level connection is illustrated above the intersection of Howard and Lexington Streets.

Scheme D is viewed as resulting in a major upgrading of the retail district, both in terms of enhancing the image and attractiveness of its public environment, and of reversing the decline of sales volumes.

Real Estate Research Corporation, in the Summary Report of the Analysis of Alternative Retail Strategies described earlier in

this chapter, outlined a "Major Upgrading of the Retail District" strategy which contained the following elements:

(1) the development of a new department store on Area 3B in Charles Center; the rebuilding of at least one major existing department store; major remodeling and modification of the remaining 2 department stores;

(2) major upgrading of key streets within the retail district; expansion of the Lexington Market; expansion of the Lexington Mall; strong linkage to the transit station; provision of additional parking; a major beautification program; major retail district promotional activities; expanded downtowner bus service;

(3) the encouragement of development of new office space west and north of the Howard and Lexington Street intersection on any sites created by redevelopment;

(4) continued public and official encouragement for expanded institutional development west of the Howard and Lexington Street intersection; increased emphasis on cultural/recreational development in this area.

Based on the adoption of this strategy for the revitalization of the retail district, RERC predicted that the decline in CBD total sales volumes between 1975 and 1985 (which was predicted to be - 32.7% for a "No-Action" or "Present Policies" strategy) could be reduced to - 11.2% (from $185.4 million in 1975 to $164.6 million in 1985).

RERC further predicted that, under a "Major Upgrading Strategy", retail district department store sales volumes could be stabilized by 1981, and begin to increase above the 1981 level by 1985. This prediction was based on the addition of a new downtown department store during this period, and the other department store rebuilding and remodeling described above.

Scheme D was identified in the Draft EIS as one of two preferred alternatives because it promises the strongest revitalizing effect for the larger retail district, and the strongest supporting relationship with the successful operation of the Lexington Market transit station and Phase I/Section A rapid transit investment.

4.0 DESCRIPTION OF THE PROPOSED ACTION

4.1 ILLUSTRATIVE DEVELOPMENT PROGRAM FOR THE PROPOSED ACTION

Four development alternatives, one sub-alternative, and a No-Action alternative for the proposed project, as described in Chapter 3.0, were presented in the Draft Environmental Impact Statement for the Lexington Market Station Joint Development Project; these alternatives were presented and discussed with the public at a public hearing on the Draft EIS on September 26, 1978. The Proposed Action for the project, which is fully described in this chapter, and was presented and discussed with the public at a project public hearing conducted on November 16, 1978, combines characteristics of the alternatives described as Schemes C ("Medium Density New Development Alterantive") and D ("Higher Intensity New Development Alternative"), which were identified as the preferred alternatives in the DEIS.

The Proposed Action provides for new investment and development in every portion of the project site. The proposed program of investment and development would provide between 245,000 and 370,000 sq. ft. of retail, department store, and entertainment space. It also provides for the development of 400 new parking spaces and projects up to 200,000 sq. ft. of new office or residential development within the project site area.

In the northwest quadrant of the project site, the original early 19th century front portion of 223 N. Eutaw Street (Arthur's Bakery) would be moved to an appropriate relocation site. The later rear portion of the building would be demolished, as would the adjoining building at 221 N. Eutaw Street and all the buildings in the southwest quadrant of the site. In the southeast quadrant, the developer selected by the City of Baltimore to undertake the project will evaluate the feasibility of adopting a preservation treatment for the interior of the Hutzler's Palace Building and will be encouraged to employ a treatment that retains the interior of the Hochschild-Kohn main building complex. If no preservation treatment is feasible, the interiors of these buildings may be restructured. The building facades at 200-218 North Howard Street and 300-310 West Lexington Street will be retained.

The proposed action provides for a two-block extension of the Lexington Street Mall from Howard Street to Paca Street. It also would serve to strengthen existing patterns of pedestrian and retail activity in the immediate environs of the project site. The proposed action includes a change in location for the construction of the Southeast Public Entrance facilities of the Lexington Market Rapid Transit Station, from the previously planned location in Lexington Street to a location at the northeast corner of Eutaw and Lexington Streets. A set of escalators and stairs would carry transit patrons from the public plaza which adjoins the mezzanine level of the Station to Lexington Street. The escalators/stairs would be oriented in such a way as to facilitate pedestrian movement between the transit station and the surrounding retail environment.

One additional property, 401-403-405 West Lexington Street, which is privately owned, has been included in the Proposed Action for possible future public acquisition. This parcel of land, which is presently leased by the Maryland Mass Transit Administration as a contractor's work area, is proposed to be permanently reserved for the future development of the southwest public entrance to the Lexington Market Transit Station.

The Proposed Action also provides for major private investment in significant new office or residential construction on the project site. It is viewed as resulting in a major upgrading of the retail district, both in terms of enhancing the image of its public environment, and in reversing the downward trend in retail sales in the area.

Figure 4-1 is an illustrative site plan of the Proposed Action. Figures 4-2 through 4-6 are illustrative floor level diagrams at the Howard Street/Mezzanine Level, the Lexington Mall Level, the Eutaw Street Level, the Entertainment Level, and the Residential/ Office Level, respectively. Figures 4-7 through 4-10 are illustrative elevations of the four streetscape elevations of the project site. Figure 4-11 is an illustrative section through the site, from Howard Street to the Lexington Market Station connection beneath Eutaw Street.

Table 4-A depicts the illustrative development envelope for the Proposed Action. Final design or development plans for the proposed project have not been prepared. However, the illustrative development envelope depicts ranges of developable floor area for retail, department store, restaurant and entertainment, office and/or residential, pedestrian plaza and concourse and necessary parking uses within the project area.

The Proposed Action does not depict a final development plan for the project site. It illustrates, for environmental impact assessment purposes, minimum acceptable and maximum achievable ranges and mixtures of potential new development uses. The lower ranges of developable square footages for each use are illustrated as the minimum level of development for the proposed action consistent with the objectives of significant increases in transit ridership, provision of jobs, improvement of the tax base, environmental improvement within the project area, and benefits for the revitalization of the larger retail district of downtown Baltimore. The higher ranges illustrate a significantly higher intensity of development for the project site, with correspondingly greater benefits in terms of transit ridership, provision of jobs, improvement of the tax base, and revitalization of the downtown retail district.

The illustrative development program is based on the conclusions and findings of extensive economic development, analysis of the downtown retail district and the proposed project site. During 1974 and 1975, Real Estate Research Corporation conducted a major economic study of the revitalization of retailing in downtown Baltimore. RERC concluded that a major upgrading of the Howard and Lexington Street Retail District could be achieved based on the following actions: development of a new department store in the Howard and Lexington Retail District; rebuilding of at least one existing major department store; modification of other existing major stores; major upgrading of all key streets in the retail

TABLE 4-A
Proposed Action:
ILLUSTRATIVE DEVELOPMENT PROGRAM

	Program Element	Range of Developable Square Footage	
		Minimum	Maximum
I.	Pedestrian Plaza/ Shopping Concourse (Level #1)	25,000	40,000
II.	Specialty Retail (Development Area #1)		
	A. Howard Street/ Mezzanine Level (Level #1)	36,600	60,000
	B. Lexington Street Mall Level (Level #2)	32,700	46,400
	C. Eutaw Street Level (Level #3)	30,700	43,600
	D. Sub-Total Specialty Retail Development Area #1	100,000	150,000
III.	Department Store Retail (Development Area #2)		
	A. Howard Street/ Mezzanine Level (Level #1)	34,200	55,000
	B. Lexington Street Mall Level (Level #2)	33,300	54,000
	C. Eutaw Street Level (Level #3)	32,500	51,000
	D. Sub-Total	100,000	160,000
IV.	Restaurant and Entertainment Space		
	A. Paca Street/Lexington Market Mezzanine Level (Level #4)	22,500	30,000
	B. Upper Level I (Level #5)	22,500	30,000
	C. Sub-Total	45,000	60,000
V.	Parking Spaces[1]		
	A. Paca Street/Lexington Market Mezzanine Level (Level #4)	25,000	35,000
	B. Upper Level I (Level #5)	25,000	35,000
	C. Upper Level II (Level #6)	25,000	35,000
	D. Upper Level III (Level #7)	25,000	35,000
	E. Sub-Total	100,000	140,000[2]
VI.	Office and/or Residential (Apartment) Development	200,000	200,000
VII	Total Developable Gross Square Footage[3]		
	A. Development Area #1	245,000[4]	310,000[5]
	B. Development Area #2	300,000[4]	400,000[5]
	C. Total	545,000	710,000

1 Parking Locations are illustrative only
2 400 parking spaces @ 350 sq. ft. per space
3 Does not include plaza space
4 Includes 100,000 square feet of parking space
5 Includes 140,000 square feet of parking space

SOURCE: Arthur Cotton Moore and Associates

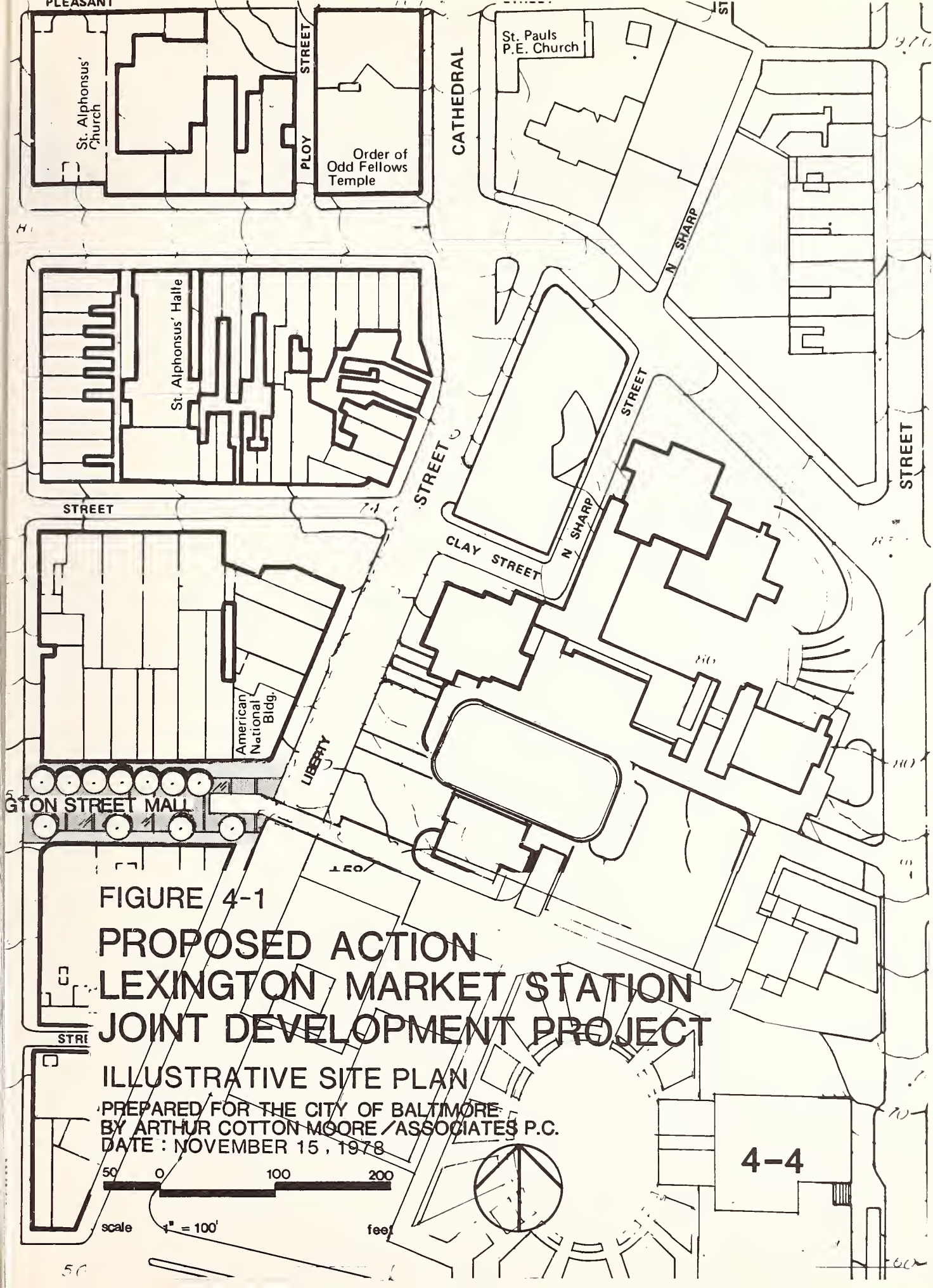


FIGURE 4-1

PROPOSED ACTION
LEXINGTON MARKET STATION
JOINT DEVELOPMENT PROJECT

ILLUSTRATIVE SITE PLAN

PREPARED FOR THE CITY OF BALTIMORE
BY ARTHUR COTTON MOORE/ASSOCIATES P.C.
DATE : NOVEMBER 15, 1978

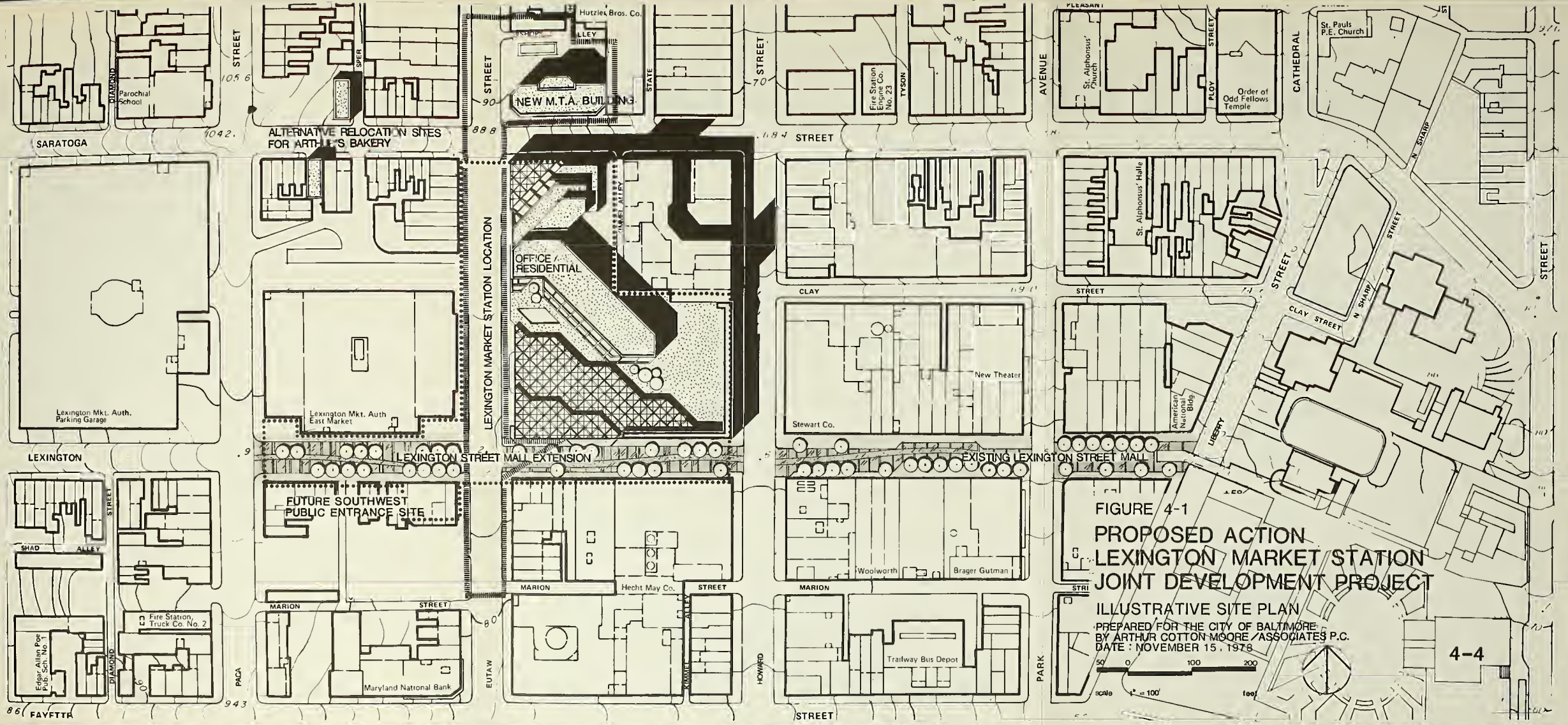


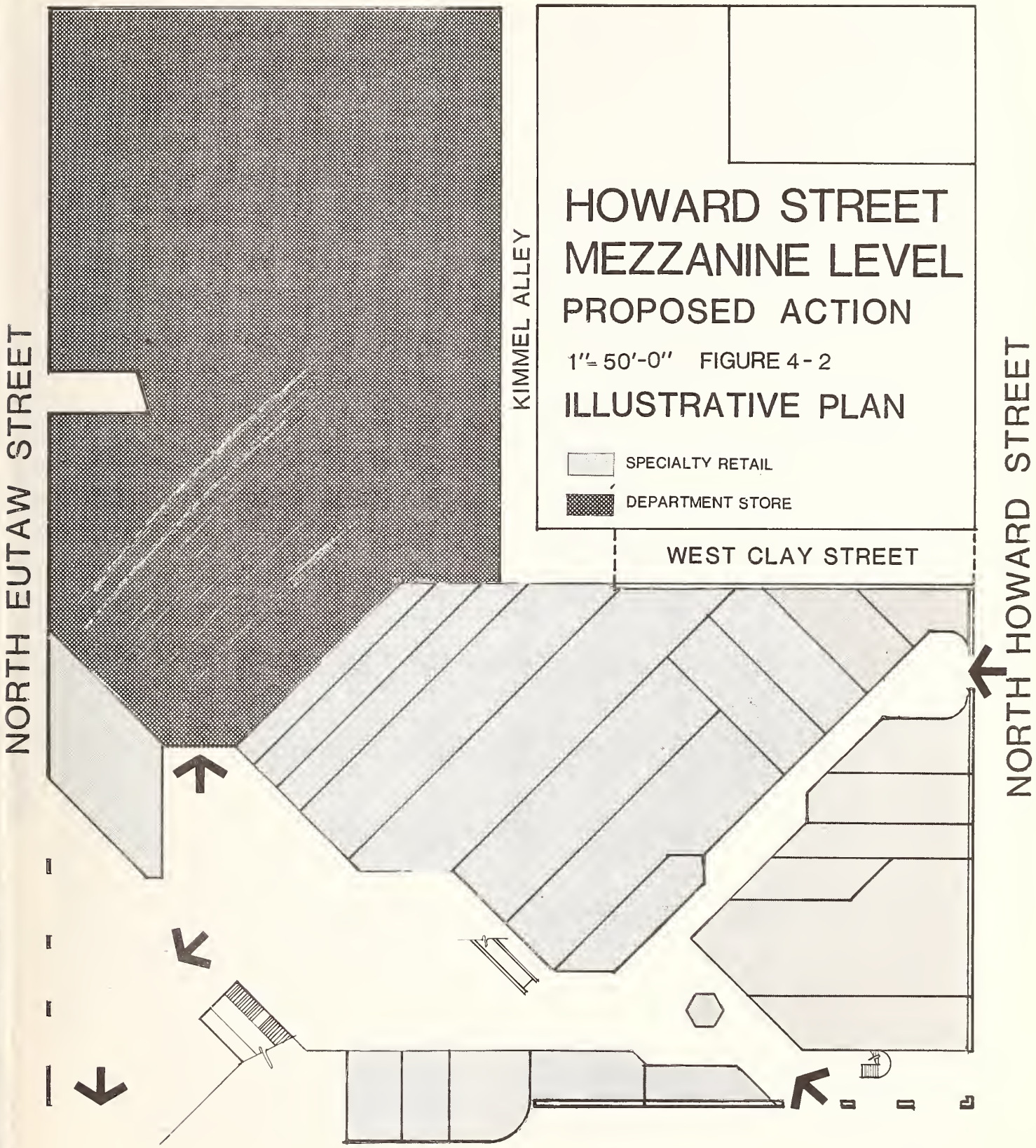
FIGURE 4-1

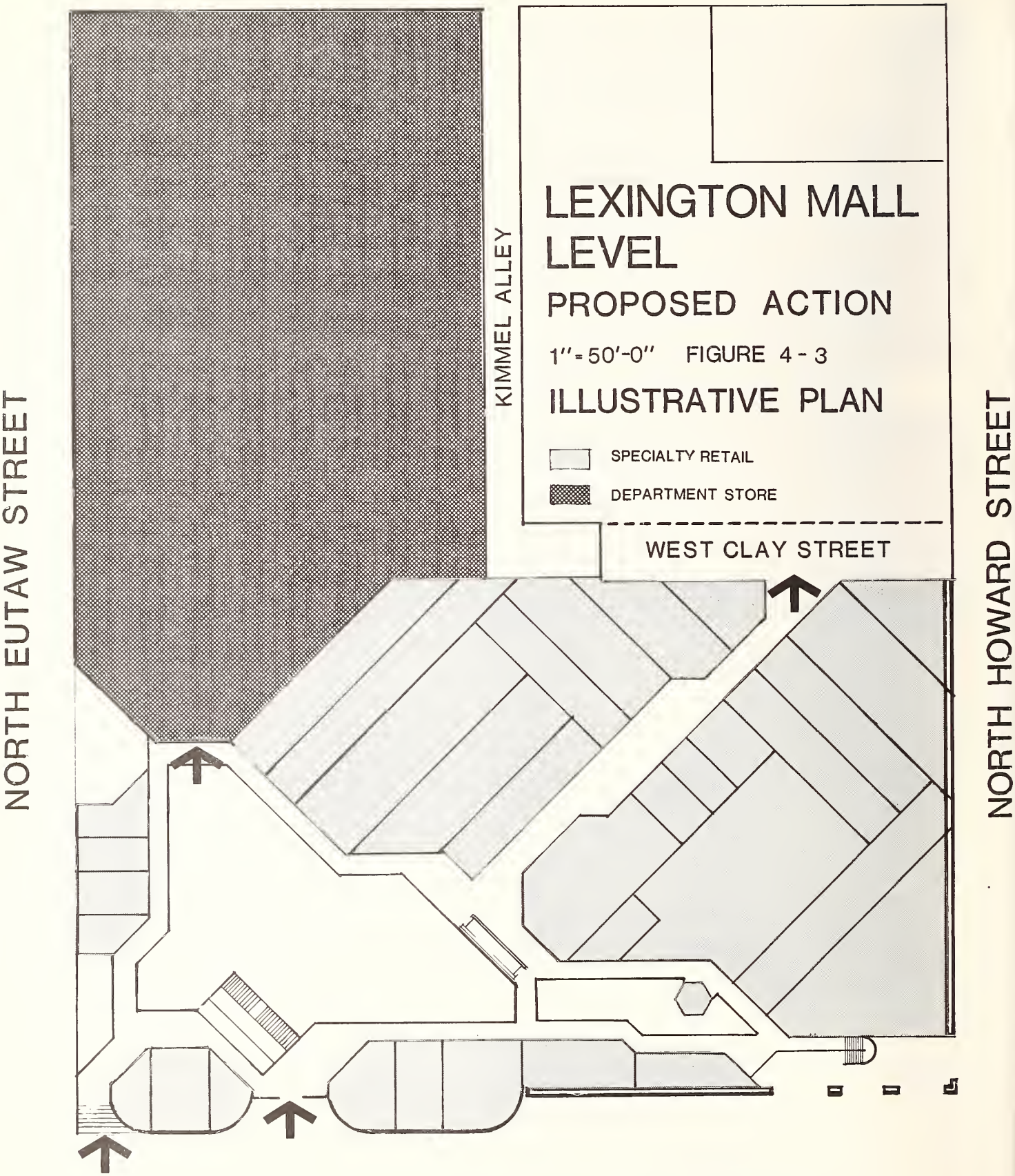
PROPOSED ACTION LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT

ILLUSTRATIVE SITE PLAN

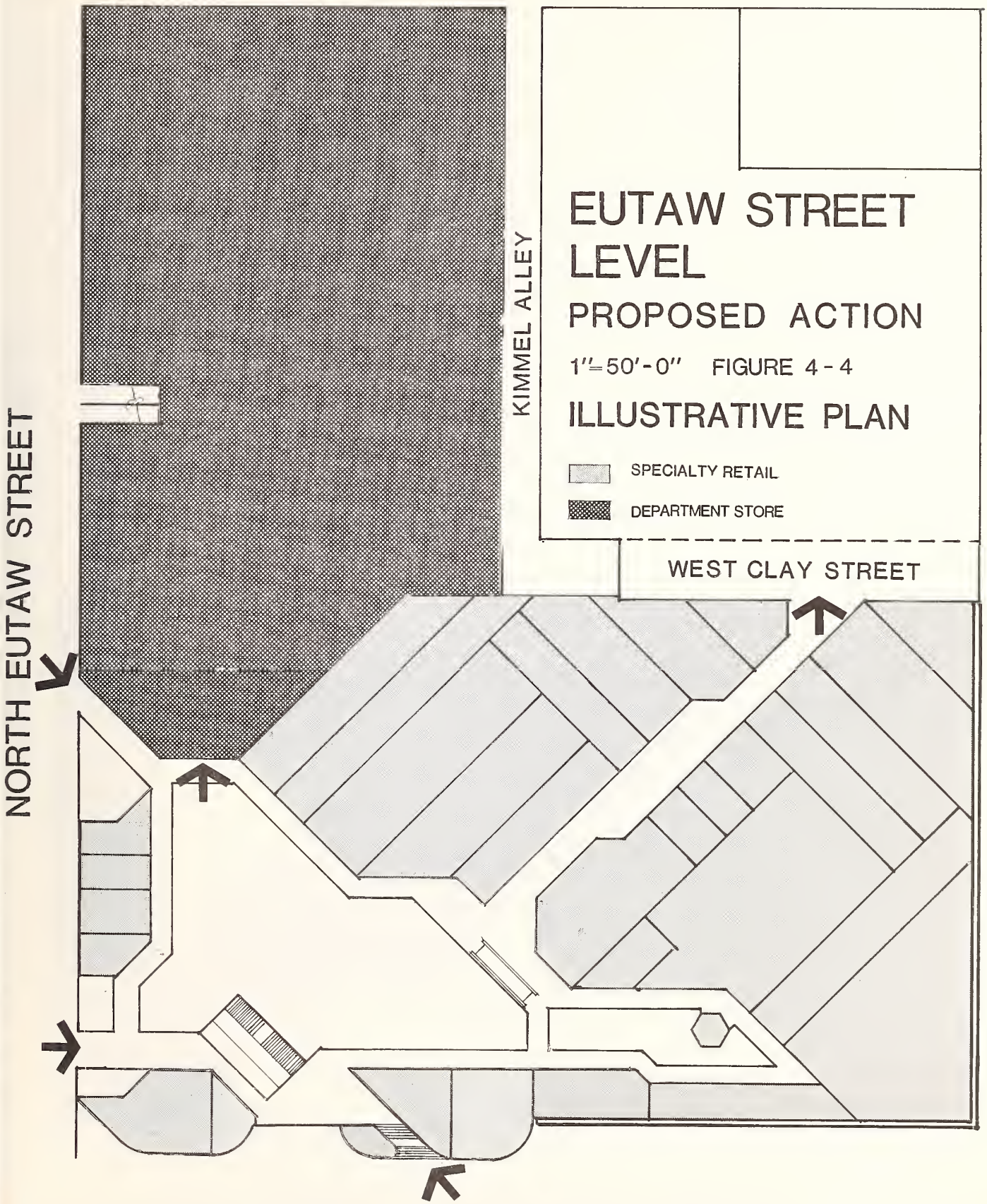
PREPARED FOR THE CITY OF BALTIMORE
BY ARTHUR COTTON MOORE / ASSOCIATES P.C.
DATE : NOVEMBER 15 , 1978

50 0 100 200
scale 1" = 100' feet


WEST SARATOGA STREET
NORTH EUTAW STREET
KIMMEL ALLEY
HOWARD STREET
MEZZANINE LEVEL
PROPOSED ACTION
1"= 50'-0" FIGURE 4 - 2
ILLUSTRATIVE PLAN
SPECIALTY RETAIL
DEPARTMENT STORE
WEST CLAY STREET
NORTH HOWARD STREET
WEST LEXINGTON STREET

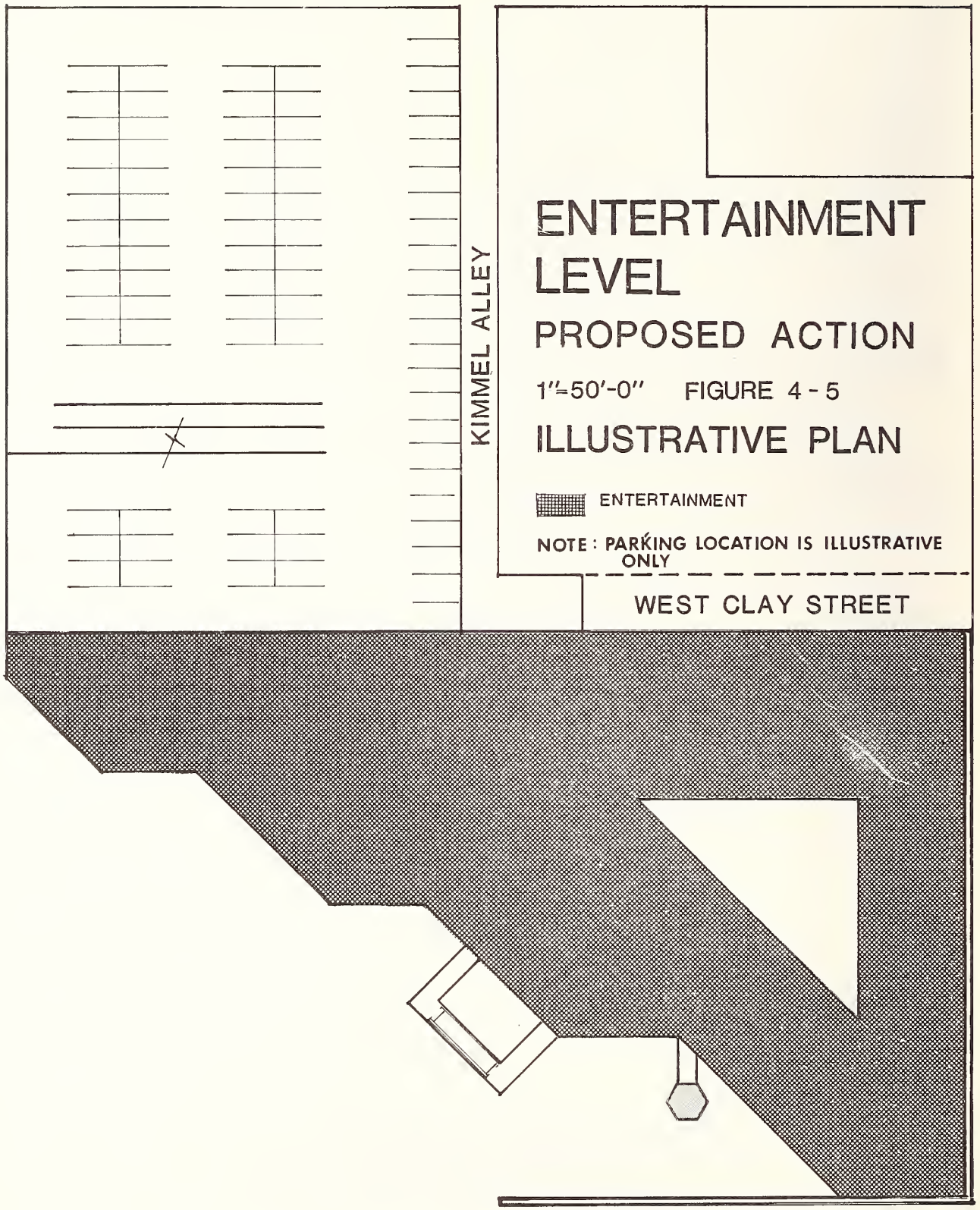

WEST SARATOGA STREET
NORTH EUTAW STREET
KIMMEL ALLEY
LEXINGTON MALL
LEVEL
PROPOSED ACTION
1" = 50'-0" FIGURE 4 - 3
ILLUSTRATIVE PLAN
SPECIALTY RETAIL
DEPARTMENT STORE
WEST CLAY STREET
NORTH HOWARD STREET
WEST LEXINGTON STREET

WEST SARATOGA STREET



WEST LEXINGTON STREET

WEST SARATOGA STREET

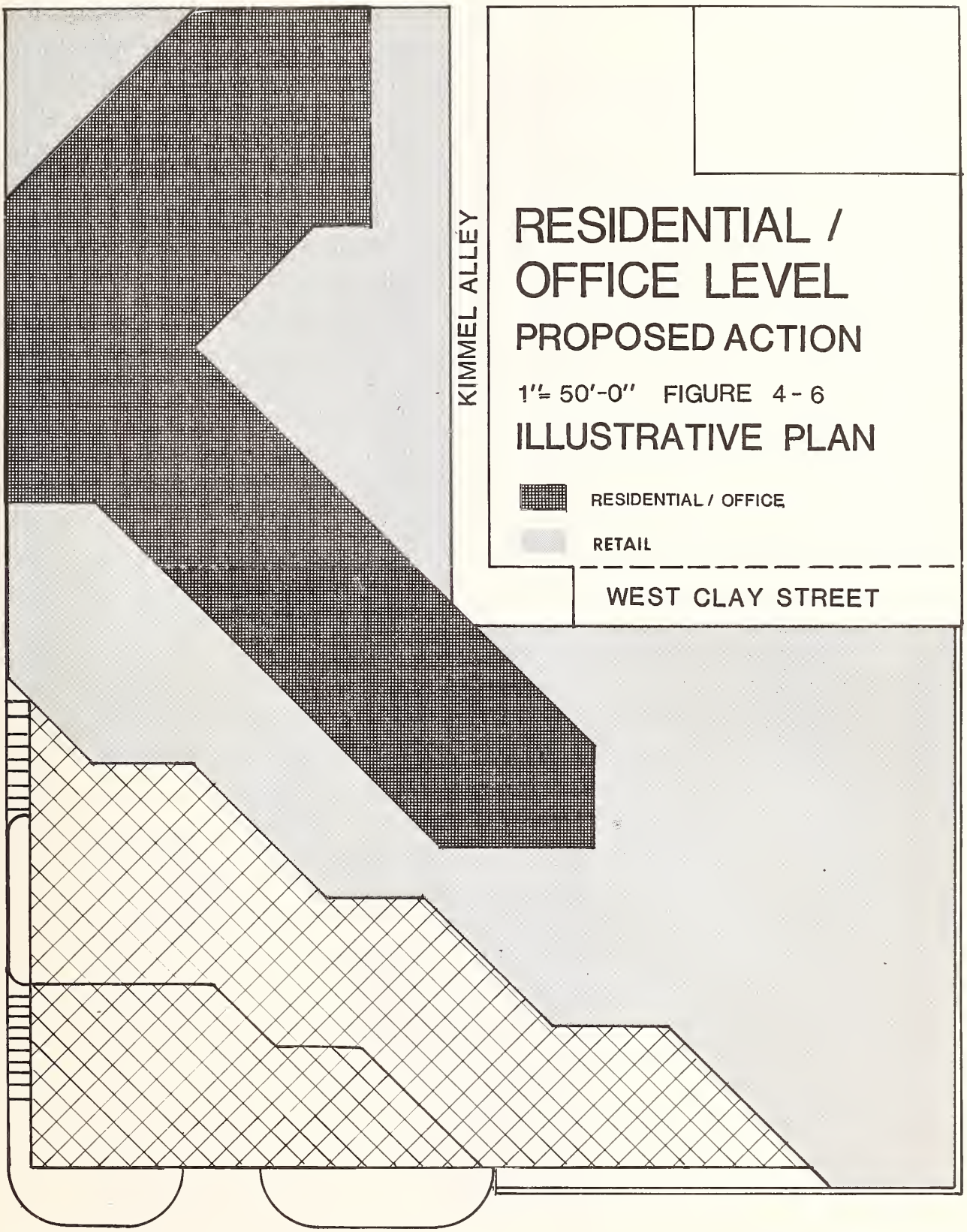


NORTH EUTAW STREET

NORTH HOWARD STREET

WEST LEXINGTON STREET

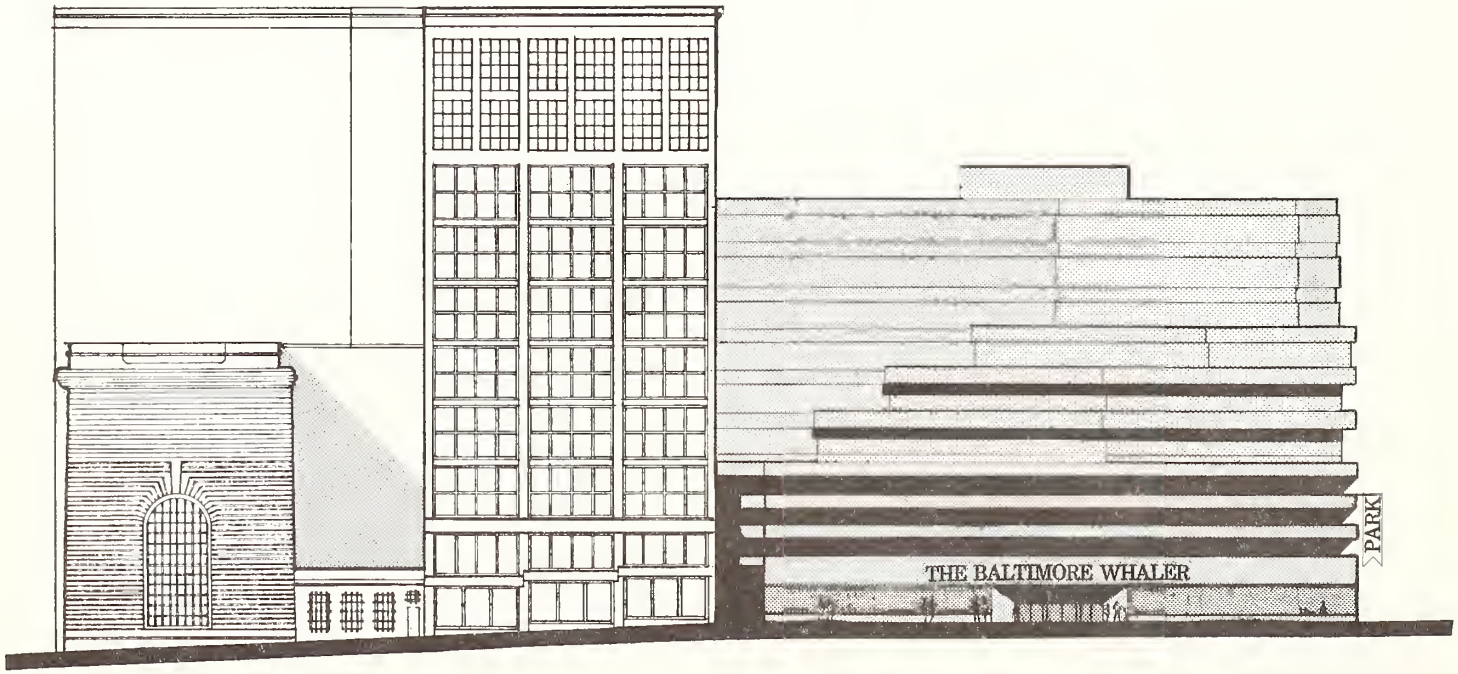
WEST SARATOGA STREET



NORTH EUTAW STREET

NORTH HOWARD STREET

WEST LEXINGTON STREET

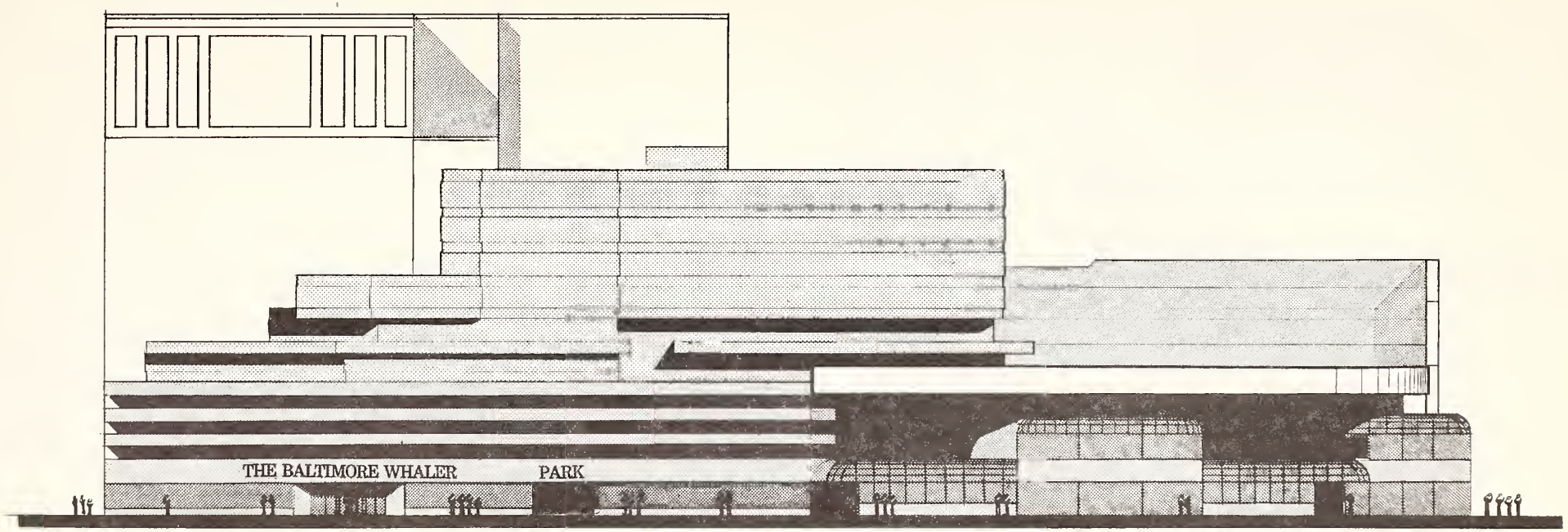


SARATOGA STREET

PROPOSED ACTION
ILLUSTRATIVE ELEVATION

10 0 32 64
feet

FIGURE 4-7

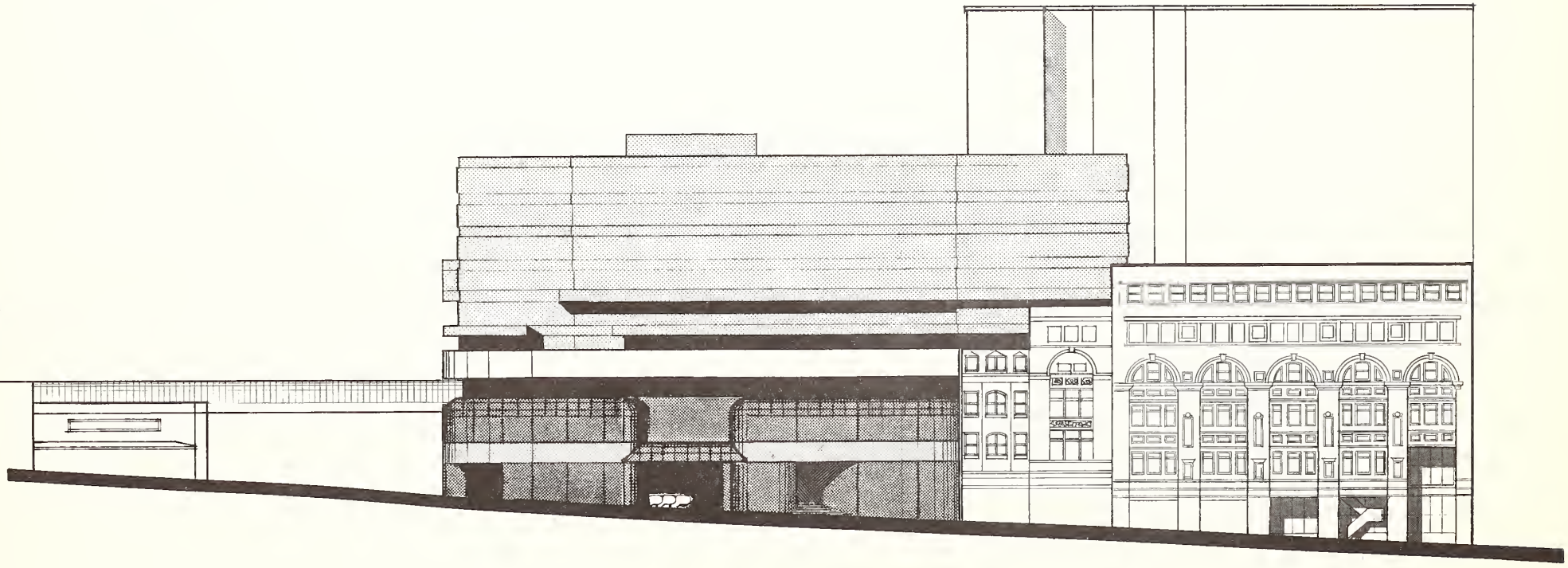


EUTAW STREET

PROPOSED ACTION
ILLUSTRATIVE ELEVATION

10 0 32 64
feet

FIGURE 4-8

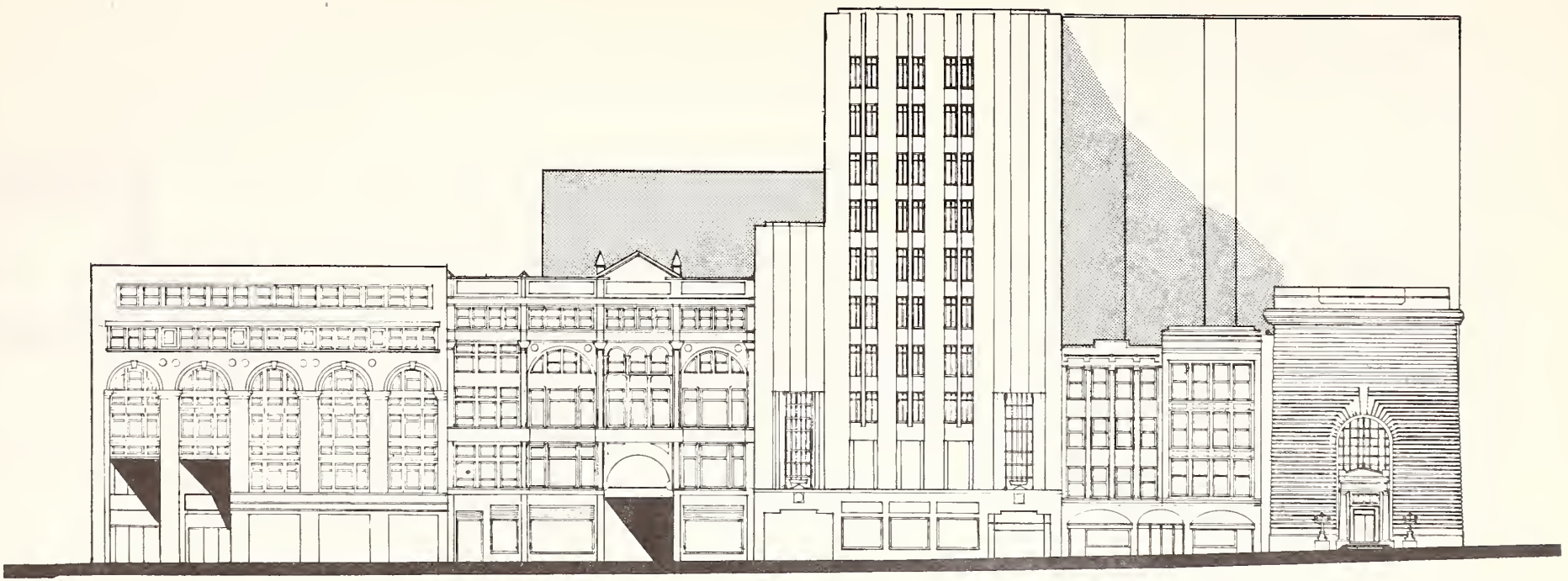


LEXINGTON STREET

PROPOSED ACTION
ILLUSTRATIVE ELEVATION

10 0 32 64
feet

FIGURE 4-9

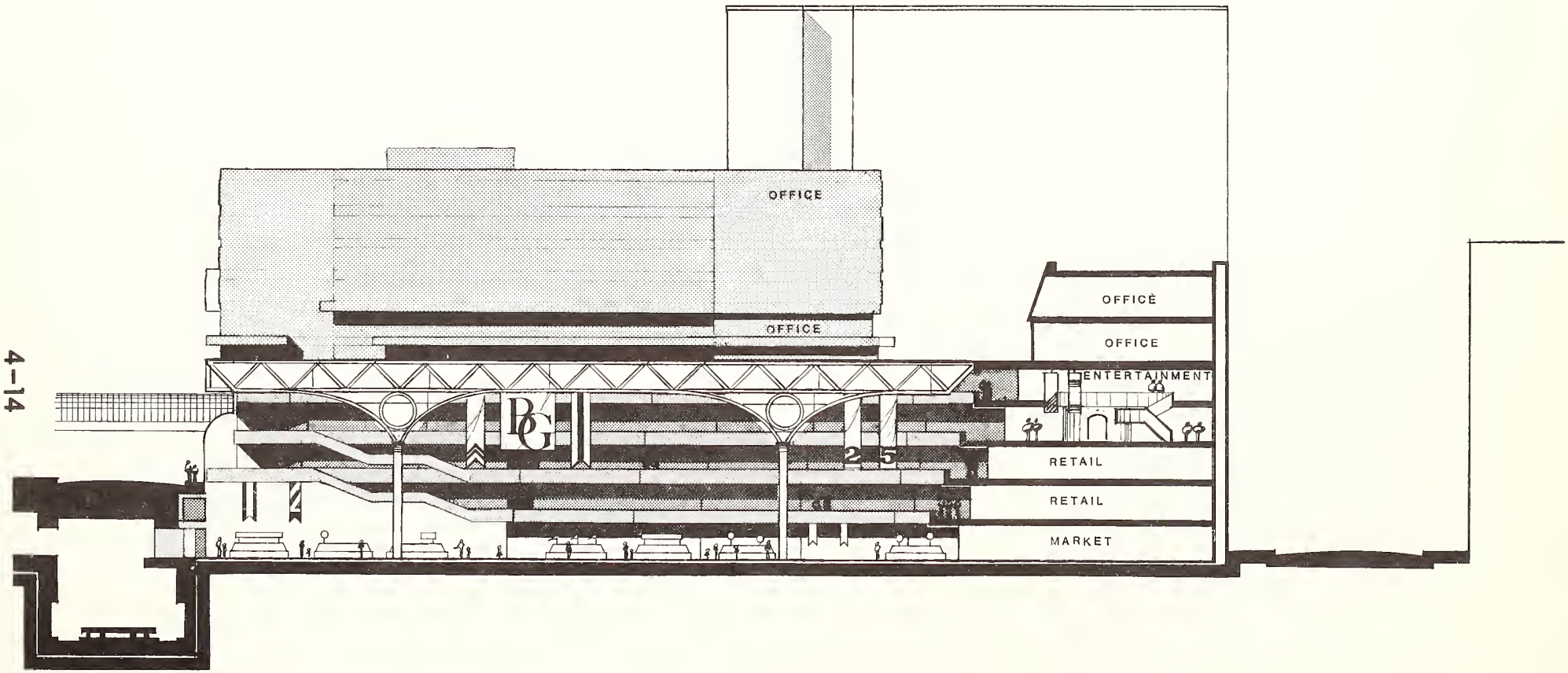


HOWARD STREET

PROPOSED ACTION
ILLUSTRATIVE ELEVATION

10 0 32 64

FIGURE 4-10



PROPOSED ACTION
ILLUSTRATIVE SECTION

10 0 32 64
feet

FIGURE 4-11

district; expansion of the Lexington Market; expansion of the Lexington Mall; strong linkage to subway; provision of additional parking; major beautification program; major CBD promotional activities; a downtown transit shuttle. As part of its major upgrading strategy, RERC stressed the need for the development of new office space to the west and north of the Lexington/Howard intersection, on any sites created by redevelopment (since designated as the proposed project site by the Mayor and City Council of Baltimore); the continued encouragement of institutional development west of Howard Street; and a major effort for cultural/recreational and entertainment development in this area.

In August 1978, Halcyon, Ltd., in its Phase I Progress Report for the Pre-Development Feasibility Analysis for the proposed project, concluded that Baltimore's downtown retail district, despite its current decline in department store sales volumes, is the single most strategic retailing location within the Baltimore Metropolitan Area. Seventy-six percent of Metropolitan area households live within a 30-minute driving distance of the project area. These households spent a total of $1.5 billion on shoppers goods in 1977 and are projected to spend $1.8 billion in 1985. In addition, the downtown retail district's market potential for renewed sales volumes is further enhanced by a captive market of more than 100,000 office workers in downtown Baltimore, a population growing at the rate of 1,500 to 2,000 per year. Halcyon found that sales in smaller shops around the project site are at or above those found in contemporary suburban shopping centers.

Halcyon identified the following major public improvements (committed or under construction) as enhancing the ability of the retail district to capture its potential share of the downtown retailing and commercial markets:

- The projected completion of the Inner Harbor project including a Convention Center, a new Hyatt-Regency Hotel, an aquarium, the shoreline "Harborplace" project, and new housing development west of Charles Street;

- Completion of the Phase I Baltimore Region Rapid Transit System, with a major downtown station at Lexington Market;

- Completion of the Baltimore City 3-A Interstate Highway System, with a ring boulevard (now under construction) along the western edge of the downtown district, only five blocks from the center of the retail district; and,

- Improved short distance accessibility between the retail district and nearby employment districts,

either through a downtown people mover (DPM) or downtown transit shuttle.

Halcyon identified the Lexington Market as a unique asset for future downtown retailing. Halcyon estimated that the market draws approximately 4 million shopper/visitors per year and generates an estimated $24 million in sales annually.

Halcyon concluded that the project site, in terms of geographic location, potential transit and automobile accessibility, and adjacency to the Lexington Market and major department stores, is a central focus of Metropolitan Baltimore. The Shoppers Goods Expenditure rate for the retail district in 1977 was estimated to be 10% of the region's potential of $1.5 billion in annual retail sales. Halcyon concluded that, with an improved and expanded Retail District, an increased 1985 Capture Rate of only 3%, up to 13%, would support the maximum development intensities illustrated for the proposed project. It was indicated that the Retail District's Capture Rate in 1972 was 15% of regional retail sales, and that the projected 3% increase appeared highly achievable--given "a dramatic new merchandising concept and strongly interconnected department stores."

Within the project site area, and its immediate environs, Halcyon recommended the development of 900 new parking spaces, with 500 spaces within the project site itself. With additional consideration of the effect of transit access (notwithstanding the fact that the rapid transit line will serve only the northwest corridor of the City), this figure has been reduced to 300-400 spaces within the project site, as part of the Proposed Action. The basis for the parking requirements associated with the Proposed Action is described in detail in Chapter 5 of this EIS.

The estimated total cost for the Lexington Market Station Joint Development Project is $20 - $35 million, depending upon the amount of new private development planned for the project site. Private sector funding would be provided by a developer to be selected by the City of Baltimore. The public sector cost would be $12.2 million, which would be used for property acquisition, relocation, demolition, historic preservation, and site preparation costs and for the extension of the Lexington Street Mall and related improvements, costs which are not significantly affected by the intensity of new development. It is proposed that $9.8 million of the public sector funds come from Section 3, Urban Mass Transportation Administration capital assistance funds. The City of Baltimore has made a commitment of $2.5 million for public expenditures in the retail district, which includes the local matching funds for the Federal (UMTA) grant.

In the Proposed Action, the southeast transit entrance functions as the connecting link between the Lexington Market Station

and intense, small-scale retailing activity throughout the "Howard Street/Mezzanine Level" of the complex. From this base level, escalators, elevators, walkways, and ramps will interconnect with the upper levels of the proposed complex and with the surrounding public streets. Public improvements along Eutaw, Saratoga and Howard Streets and the extension of the Lexington Street Mall will be coordinated with the design and development of the proposed project.

As described in Chapter 3.0 of this EIS, the proposed change in location of the southeast entrance facilities for the Lexington Market Station provides a significant basis for the Lexington Market Station Joint Development Project.

The southeast entrance facilities must be constructed as part of the critical path construction schedule for the Phase I/ Section A Baltimore Region Rapid Transit System. The Master Schedule for the BRRTS project requires construction completion of the Lexington Market Station structure by February 1981; the beginning of the installation of station finish materials (including mechanical/electrical and plumbing equipment, as well as interior architectural finishes) is scheduled to begin in mid 1980, and to be completed by October 1981; actual revenue operations along the Phase I/Section A transit line are scheduled to begin during the Spring of 1982.

The implementation of the southeast entrance construction, within the overall master schedule for the Phase I/Section A line, is explained in detail in Part IV of the report entitled, Lexington Market Station Southeast Entrance, prepared for the Mass Transit Administration by Daniel, Mann, Johnson & Mendenhall/Kaiser Engineers in January 1978. A copy of this report is available for inspection.

In order to complete the construction of the southeast entrance without delaying the overall Phase I line, construction of the entrance structures must begin during the Spring of 1979, and be completed during the Summer of 1980.

In addition, the proposed two-block extension of the Lexington Street Mall, which will provide direct pedestrian access to the southeast entrance from both east (Charles Center) and west (University of Maryland campus and Social Security Administration office center) should be completed in time for station opening in 1982. Even under the No-Action alternative, a one-block extension of the Mall should be completed in time for station opening in 1982.

The Proposed Action permits the Mass Transit Administration to proceed with the construction of the southeast public entrance facilities within the overall critical path schedule for the

completion of the Phase I/Section A project. It provides for sufficient construction use, storage, staging, and access area for this purpose, within the southwest quandrant of the proposed project site area.

As the Mass Transit Administration and its contractors will occupy most of the project site area west of Kimmel Alley until 1982 (including all portions of the northwest quandrant of City Block 596, except for the properties at 221 and 223 North Eutaw Street, for a contractor's work and storage area, and the southwest quadrant of City Block 596, for the construction of the southeast entrance facilities) private development activity within the designated public/private portions of the project area must begin within the area bounded by Kimmel Alley, Clay Street, Howard Street, and Lexington Street.

The Proposed Action allows private development within the project area to begin in this area of the site, further allowing this critical element of the project to be completed in coordination with the scheduled opening of the Phase I/Section A transit line in 1982.

4.2 Future, or "Secondary", Development Concepts Identified with the Proposed Action

In order to provide the fullest possible environmental assessment of the effects of the proposed action, illustrative future, or "secondary", development concepts have been identified for the Proposed Action. These concepts are viewed as reasonable anticipation of the types of additional public and private actions which might occur within and around the project site as indirect results of implementing the Proposed Action. All of the illustrative secondary development actions require separate funding, official approvals, or private development initiatives not included in the current joint development project.

The following indirect actions have been associated with the proposed action:

- The possible future treatment of adjacent blocks of North Howard Street as a Transit Mall;

- The possible future construction of connecting second-level linkages between the specialty retailing development within the project site and other major retailing uses surrounding the Howard and Lexington Streets corner;

- The possible future installation of a Downtown People Mover system along the Lexington Street Mall;

- The possible future construction of a second-level connection (above Eutaw Street) between the project site and the mezzanine-level of the Lexington Market Authority's East Building;

- The possible future connection of the Lexington Market East Building directly to the mezzanine level of the Lexington Market Station;

- The future construction of the southwest public entrance to the Lexington Market Station at the southwest corner of Eutaw and Lexington Streets, and the future development of the block bounded by Lexington Street, Eutaw Street, Marion Street, and Paca Street with public and private uses;

- The possible future development of new parking levels above the Lexington Market Authority East Building, with ramp connections to West Clay Street between Eutaw and Paca Streets;

- A significant physical improvement or redevelopment program for the area west of Eutaw Street;

- Major private investments in the renovation and refurnishing (interior and exterior) of existing department stores and retail shops within adjacent areas of the retail district;

- Possible future air rights development above and/or below the Lexington Street Mall.

5.0 ENVIRONMENTAL IMPACTS OF THE PROPOSED ACTION

5.1 Overview of the Assessment Process

This chapter describes the anticipated beneficial and adverse impacts of the proposed project upon the natural, physical and socio-economic environment in the study area. In defining the anticipated benefits and adverse impacts of the various alternatives, it is necessary to consider a number of dimensions including: the nature of the impacts, the geographic locus of their effects, the time frame over which they would occur and their sequential interaction.

Basis for Evaluation

The general approach employed in evaluating possible impacts is the comparison of the proposed action against the "no-action" alternative. The "no-action" option is considered as the baseline case, i.e., the one which defines the conditions to be expected if the Lexington Market transit station construction program proceeds without the joint development program.

The discussion of potential impacts is structured in relation to four time frames within which effects might be noted--pre-construction (1978), construction (1979-85), short-term operation (1982-87) and long-term operation (beyond 1987). The discussion also distinguishes between the direct (primary) impacts of the proposed project and induced (secondary) effects that may arise as a result of added development stimulated by the project. The methodology used to assess possible impacts and the significance of analyzed results are also described.

Cycle of Impacts Framework

"Cycle of impacts" tables were prepared for the "no-action" alternative and for the proposed action. These "cycle of impacts" tables provide an overview of the assessment process and identify the context within which the significance of potential project impacts was determined.

The following discussion highlights the major findings that resulted from developing the "cycle of impacts" framework for each alternative. Key observations regarding direct or indirect impacts are presented in each critical event in the implementation process.

Key Observations - Proposed Action

Implementation of the proposed action development alternative would initiate an essentially positive "cycle of impacts" that would be primarily focused on the project site and its immediate environs. In tracing (1) the direct effects; (2) the primary groups affected; (3) the short and long term consequences; and (4) the overall significance of each critical event in the implementation process, the following observations were made:

- The accouncement of Federal grant approval would signal a change from "planning" to "action" by the public sector.

- The project site acquisition effects would displace certain existing retail businesses and cause an interim loss of property tax revenue for the City of Baltimore.

- The final selection of the private developer would increase the confidence of the private sector in the future of the Retail District.

- During the construction of the Lexington Market Station, increased noise and air pollution and traffic congestion will occur, negatively impacting retail sales in the area.

- The subsequent site preparation activity would increase noise and air pollution, traffic disruption and congestion and induce limited speculative investment actions.

- The construction period for the joint development project and the Lexington Market Station would be the period of the most negative environmental impact, particularly related to noise, air pollution, and traffic congestion.

- The simultaneous opening of the Lexington Market Station and the proposed action development would generate a significant increase in retail sales, the property tax base and MTA rapid transit ridership in comparison to the "no-action" alternative

- The short-term operation (1982-87) of the Lexington Market Station and the new retail development would induce rehabilitation of adjacent stores and generate a sustained increase in MTA ridership. In addition, the private sector investment outlook for the Retail District would be positively altered.

- The long-term operation (1987 and beyond) of the Lexington Market Station and the new development project would induce a second stage of commercial development which, in turn, would further increase retail sales, property tax base, and MTA rapid transit ridership.

Key Observations - "No-Action" Alternative

Under the "no-action" alternative, the construction of the Lexington Market Station's southeast entrace would proceed in accordance with the original station design (the entrance would be located in the bed of Lexington Street, between Howard and Eutaw Streets). In general, the resultant "cycle of impacts" would reinforce existing negative economic trends. The only induced development potential associated with this alternative would be the redevelopment of those properties already acquired for MTA construction purposes. The type and magnitude of development anticipated on these sites would be limited to approximately 25,000 square feet of convenience/ discount retailing facilities.

In tracing the direct effects and the short and long term consequences of critical events in the "no-action" process, the following observations emerge:

- The cancellation of the proposed Baltimore Gardens project would signal a breakdown in the public sector sponsored joint development process.

- As a result, a general period of private sector investment uncertainty would occur. This might result in the closing of at least one additional major department store in the Retail District.

- During the construction of the Lexington Market Station, increased noise and air pollution and traffic congestion will occur, negatively impacting retail sales in the area.

- The opening of the Lexington Market Station is not expected to generate any additional development in the Retail District, apart from the potential for convenience/discount retail development on MTA owned/leased property.

- Subsequent to the station opening, limited real estate speculation might occur. In addition, limited new development plans could be expected although no major new development would be likely until several years after the station opens.

In summary, the "no-action" alternative would delay the revitalization of the retail district for at least five years. When renewed development efforts occur, the economic base of the area would be reduced.

5.2 Land Use and Urban Framework

Development of the proposed action scheme would serve to focus and concentrate retail activity in what historically has been the retail core of the City. The reversal of declining sales levels and the new incentives for rehabilitation and renovation in surrounding areas of the Retail District are seen as positive impacts. Demolition of a number of properties within a one-half square block area and the relocation of 3 businesses now on the project site would result form project implementation. No significant changes in the existing land use pattern, other than the possible inclusion of residential units, or zoning changes, are envisioned.

Direct Impacts

The configuration of the proposed action and the elements contained therein is a result of a lengthy evolution and planning process. This process has identified a number of important urban design objectives which have been incorporated into the joint development project (see Chapter 3 of this Statement). As presently conceived, the proposed action would yield positive urban design benefits in that it would provide a means of attaining the following objectives:

- creation of a pedestrian and visual linkage between the transit station and other major downtown activity centers;
- restoration and enhancement of the functional and perceptual focus on a core retail area;
- separation of pedestrian and vehicular traffic;
- retention of the basic streetscape and its definitional boundaries;
- provision of pedestrian amenities and spaces;
- functional integration of related and mixed use activities and expansion of volume and hours of downtown activity.

Induced (Secondary) Development

If the proposed action is implemented, it is projected that the cycle of impacts will lead to further expansion and revitalization of the CBD. While the precise nature, density, and timing of such induced development cannot be anticipated at this time, the City possesses sufficient control mechanisms (e.g. urban renewal controls) to ensure that these developments follow the CBD Master Plan guidelines.

The existing Master Plan for the CBD is based on the Lexington Center Plan described in Chapter 3. This plan calls for mixed-use development and renovation of the area between Lexington Market and Charles Center (see Figure 3 - 4) incorporating a total (including Baltimore Gardens) of 1.35 million square feet of retail, entertainment and office space, 300 apartment units and 4,850 parking spaces. The total cost has been estimated at $210 million and would be financed jointly by public and private investment. The plan set forth in Figure 3 - 4 represents the best current estimate of the overall long-term land use changes that might be induced by the joint development project.

The City Planning Department has recently (1977) completed a study of traffic access and circulation patterns assuming implementation of the Lexington Center Plan.[1] This analysis indicates that the location and capacity of proposed parking facilities under the Plan is adequate to handle anticipated demand and that, with possible changes in traffic patterns (e.g., conversion of Park Street to two-way operation if the Howard Street Transit Mall is developed) and control of left-turn movements, the existing street capacity is adequate to handle traffic generated by the Lexington Center components.

5.3 Socio-Economic Impacts

The direct socio-economic impacts of the proposed joint development project include effects on the following property

[1] Prepared by Barton-Aschman Associates, Inc.

acquisition and tenant displacement; retail sales activity, employment, property tax base, municipal service requirements and life style opportunities. Due to the nature of the proposed joint development projects, the direct socio-economic and land use impacts and the indirect (induced) effects on retail sales and employment are the most significant. The basic objectives of the project stress revitalization of the retail core and reversal of recent declines in retail activity, employment, and tax revenues. Except for the negative consequences of property acquisition and tenant displacement these impacts are essentially positive in nature.

Property Acquisition and Tenant Displacement

The construction of the proposed joint development project would require the acquisition of 15 separately identifiable parcels of land (See Figure 5 - 1). The total land area included in these takings equals 1.65 acres (71,816 square feet). Currently these properties are owned by 7 different individuals, legal trust, or corporations. In addition, the MTA has already acquired eight parcels for construction staging and these also would be redeveloped as part of the project. Table 5-A depicts the existing ownership and usage of the properties which would have to be acquired.

One additional property, 401-403-405 West Lexington Street, which is privately owned, has been included in the Proposed Action for possible future public acquisition. This parcel of land, which is presently leased by the Maryland Mass Transit Administration as a contractor's work area, is proposed to be permanently reserved for the future development of the southwest public entrance to the Lexington Market Transit Station.

The total acquisition costs for the properties in City Block 596 are estimated to be approximately $4,288,000. The final acquisition costs will be determined through individual property appraisals which are now underway. The entire proposed joint development project site lies within the boundaries of the Retail District Urban Renewal Area.[2] The City would acquire all privately owned property interests within the project area.

In executing its power to acquire the property, the City would pay property owners fair market value for their property (land and improvements). These owners would lose the opportunity to upgrade their individual parcels in anticipation of higher future returns and, in this sense, the taking must be considered an adverse impact.

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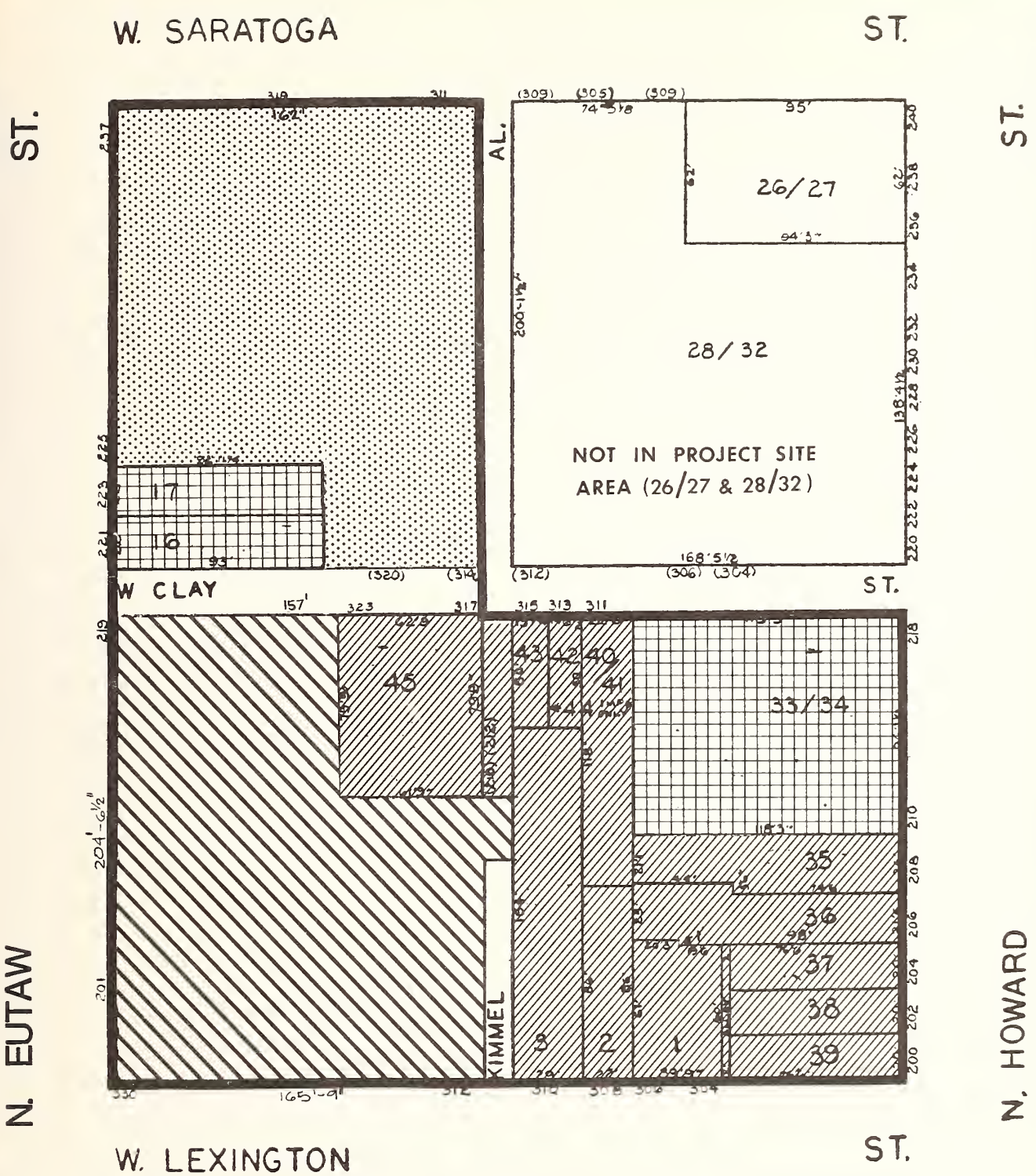
[2] See Chapter 2, page 12 for a further description of the Retail District Urban Renewal Ordinance.



ENVIRONMENTAL IMPACT STATEMENT
CITY OF BALTIMORE:
THE LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT

FIGURE 5–1

ACQUISITION PARCELS: STATUS AS OF 2-15-79

- PROPOSED PROJECT TAKING
- CURRENT RETAIL OPERATIONS PRIVATELY OWNED
- VACANT PRIVATELY OWNED
- MTA OWNED (VACANT–BUILDINGS DEMOLISHED)
- VACANT CITY OWNED

SOURCE: DEPT. OF HOUSING AND COMMUNITY DEVOLPMENT

Table 5-A
Property Acquisition
Current Ownership and Usage

Block/Lot		Address	Current Use	Property Owner
596	1	304-306 W. Lexington St.	Vacant - retail	Hochschild-Kohn
"	2	308 W. Lexington St.	Vacant - retail	Wm. Greenfield Estate
"	3	310 W. Lexington St.	Vacant - retail	Clara Leiblich, et al
"	4	312 W. Lexington St.	Vacant - retail	Mayor & City Council of Baltimore
"	5	314 W. Lexington St.	Vacant - retail	Mayor & City Council of Baltimore
"	6	316-318 W. Lexington St.	Vacant - retail	Mayor & City Council of Baltimore
"	7	320-322 W. Lexington St.	Vacant - retail	Mayor & City Council of Baltimore
"	8	324 W. Lexington St.	Vacant - retail	Mayor & City Council of Baltimore
"	9	326 W. Lexington St.	Vacant - retail	Mayor & City Council of Baltimore
"	10	328-330 W. Lexington St.	Vacant - retail	Mayor & City Council of Baltimore
"	11	201 N. Eutaw St.	Vacant - retail	Mayor & City Council of Baltimore
"	12	203-205 N. Eutaw St.	Vacant - retail	Mayor & City Council of Baltimore
"	13	207-209 N. Eutaw St.	Vacant - retail	Mayor & City Council of Baltimore
"	14	211 N. Eutaw St.	Vacant - retail	Mayor & City Council of Baltimore
"	15	213-219 N. Eutaw St.	Vacant - retail	Mayor & City Council of Baltimore
"	16	221 N. Eutaw St.	Vacant - retail	3900 Corporation
"	17	223 N. Eutaw St.	Retail Bakery	Frank S. Arthur, Jr.
"	18-25	225-237 N. Eutaw St. 311-319 W. Saratoga St. 314-320 W. Clay St.	Contractor's Work and Storage Area	State of Maryland (MTA)
"	33/34	210-218 N. Howard St.	Department Store (portion)	Hutzler Brothers Co.
"	35	208 N. Howard St.	Vacant - retail	Hochschild-Kohn
"	36	206 N. Howard St.	Vacant - retail	Hochschild-Kohn
"	37	204 N. Howard St.	Vacant - retail	Hochschild-Kohn
"	38	202 N. Howard St.	Vacant - retail	D. C. McDonnell, et al
"	39	200 N. Howard St.	Vacant - retail	Clara Leiblich, et al
"	40/41	311 W. Clay St.	Vacant - retail	Hochschild-Kohn
"	42	313 W. Clay St.	Vacant - retail	Clara Leiblich, et al
"	43	315 W. Clay St.	Vacant - retail	Hochschild-Kohn
"	44	311-313 W. Clay St. (Improvements only)	Vacant - retail	Hochschild-Kohn
"	45	317-323 W. Clay St.	Vacant - retail	Hochschild-Kohn

Table 5-B

EXISTING BUSINESS ESTABLISHMENTS
WITHIN THE PROJECT SITE AREA

The Lexington Market Station
Joint Development Project

Name and Address	Type of Business
1. Arthur's Bakery 223 North Eutaw Street Baltimore, Maryland 21201 Mr. Michael Monaghan and Mrs. Kathleen Monaghan, Proprietors	Bakery - Retail (owner/occupant)
2. Hutzler's Department Store South Bldg. 210-218 North Howard Street Mr. Austin Kenly, Senior Vice-President and Chief Operating Officer Hutzler's Department Store 212 North Howard Street Baltimore, Maryland 21201	Department Store (owner/occupant)
3. Hochschild-Kohn Department Store *317-323 West Clay Street *315 West Clay Street *310 West Lexington Street/ *313 West Clay Street *308 West Lexington Street *311 West Clay Street *304-306 West Lexington Street *200 North Howard Street *202 North Howard Street *204-206-208 North Howard Street Mr. Ward Wood, President Hochschild-Kohn and Company 1726 Whitehead Road Baltimore, Maryland 21207	Department Store (owner/occupant) (owner/cccupant) (tenant) (tenant) (owner/occupant) (owner/occupant) (tenant) (tenant) (owner/occupant) *Hochschild-Kohn and Company terminated retail business operations in these properties as of August 1977. They are vacant.

A concomitant effect of the property acquisition would be the displacement of the 2 business operations that presently occupy these properties. It is important to recognize that only 10%[3] of the potential commercial space included on the proposed project site is currently in active use and that only three of these active businesses (including Hutzler's) are owner occupied. The inventory of existing businesses that would be displaced is shown in Table 5-B.

The Hutzler's Department Store operation could be consolidated into unutilized space in the remaining Hutzler buildings on the northeast quadrant of the project block. The other

[3]According to a recent 1979 City Planning Department survey, 28,000 square feet of the total 269,340 square feet of commercial space is in active use.

businesses would have the options of: (1) permanently relocating to other quarters in this vicinity; (2) seeking temporary locations with plans to move into the joint development project when it is completed (the displaced businesses have a right of first refusal in the new facility), or (3) ceasing operations.

A recent (November 1977) reconnaisance of the study area indicated some 14 vacant storefronts within three (3) blocks of the project site which could potentially serve as relocation sites for displaced merchants. Precise rental rates are difficult to determine but the current asking prices appear to be in line with prevailing rates on the project block.

The mitigating measures available to minimize adverse impacts to displaced businesses include (1) the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 which provides funds for relocation of business establishments and for acquisition of tenant leasehold interests[4] and (2) the Maryland Relocation Assistance Program (Statute 1455) which provides partial subsidies to offset rent increases for displaced merchants. Under this latter program, businesses would be provided funds to cover up to 50% of rent increases (in comparable new locations) over a five-year period (to a maximum total of $25,000 per establishment).

The provisions of the Uniform Relocation Assistance Act provide for either a payment of actual, reasonable moving expenses, including damage due to moving and expenses in searching for a replacement location or under certain conditions, a fixed payment in lieu of the moving payment. Under the fixed payment, the allowance is tied to the average annual net earnings of the business with minimum and maximum amounts prescribed. Payments may also be allowed for actual, direct losses of tangible personal property when a displaced owner who is entitled to relocate chooses not to. Payments may only be made after a bona fide effort has been made to sell the items involved. Relocation counseling, including technical and managerial assistance, assistance in obtaining bank loans or Small Business Administration loans, will be provided by the City Department of Housing and Community Development.

In addition, the Retail District Urban Renewal Plan and Ordinance (Ordinance No. 5 approved by the Mayor & City Council of Baltimore November 16, 1977) provides that retail businesses which are located within the project area and are displaced by renewal activities will be given a "right of first refusal" to occupy space in new retail commercial facilities developed for lease or sale on project disposition sites.

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[4] Includes moving expenses, allowances for furnishing and fixtures and relocation counseling.

Individual merchants may incur some non-reimbursable losses as a result of displacement, including discontinuities, loss of prior customers and/or costs of adapting new quarters. These may be parti ally or even totally offset by increased efficiency in new quarters and new customers. Establishments which have a strong customer identity and loyalty will suffer less than those which rely primarily on passers-by or drop-in trade or which carry undifferentiated merchandise lines.

A Business Relocation Plan for the joint development project has been prepared by the City's Department of Housing and Community Development. The Relocation Plan is available for inspection at this Department. This plan, in conformance with the applicable federal statutes and UMTA procedures[5], details the full range of support and counseling resources available during the relocation process. The counseling, coordination and property data base features of the plan, together with a commitment to maximum notice and lead time to affected establishments, owners and employees, serve as measures to mitigate the impacts of displacement/relocation.

Retail Sales Activity

The implementation of the proposed joint development project would generate approximately $46 million[6] in new annual retail sales during the short-term operation period after the project and the Lexington Market Station open.[7] In comparison to the "no-action" alternative, the annual increase in retail sales volume for the Retail District would be approximately $52 million; the increment in comparison to the "no-action" option is higher due to the projected loss of one additional major department store under that alternative.

The retail sales estimates take into account the retail sales generated by the new components of the proposed action and the project's impact on sales volumes of existing retail shopping facilities in its immediate vicinity. The retail trade impact analysis was completed for each type of retailing component. In the "no-action" case, it was estimated that approximately 25,000 square feet of discount retail operations would be developed on

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[5]Land Acquisition & Relocation Assistance under the Urban Mass Transportation Act of 1964, as amended, UMTA Circular 4530.1 (March, 1978).

[6]All estimates are stated in 1977 dollars; estimated by Robert J. Harmon and Associates, Inc.

[7]Total of sales from new facilities plus additional sales generated by existing adjacent facilities; see discussion which follows.

the properties currently being used by MTA. Table 5-C presents a complete breakdown of the results of this portion of the retail trade impact analysis.

Table 5-C

COMPONENTS OF THE RETAIL SALES GENERATED BY NEW FACILITIES*

Alternative	Facility Component	Space	Sales Per Sq. Ft.	Total Ann. Sales
I. Proposed Action	Specialty Retail	131,000	$175 - $200	$24,562,500
	Department Store	135,000	$ 70 - $ 80	$10,135,000
	Entertainment	60,000	$110	$ 6,600,000
	Subtotal	326,000	$137	$41,297,500
II. "No-Action"	Discount Retail	25,000	$ 75 - $100	$ 218,750

*All estimates of retail sales are stated in 1977 dollars and represent only those attributable to incremental new or refurbished space contained in the project. Estimates are based on national averages and surveys performed by the Urban Land Institute. These were confirmed by the Real Estate Research Corporation in their February, 1975 study, Downtown Baltimore Retail Revitilization Strategy and Implementation Planning, prepared for Charles Center-Inner Harbor Management, Inc., and the City of Baltimore and By James B. McComb and Associates, Inc., on the basis of their unpublished surveys of Alburquerque, Minneapolis, and St. Paul.

SOURCE: Robert J. Harmon and Associates, Inc.

Both the proposed action and the "no-action" alternative would positively impact the sales volume of the existing retail facilities in operation at the time the Lexington Market Station opens. However, the continuation of negative economic trends that would occur under the "no-action" case might result in the closing of at least one additional department store. The combined effect of (1) the Lexington Market Station opening and (2) the partial retention of the trade of the closed store by the remaining outlets would offset approximately 1/3 of the potential $8-10 million loss in sales volume associated with the closing of one additional department store. In contrast, the implementation of the proposed action alternative would result in $4.6 million of increased annual retail sales volume for existing facilities. The increased volume is based on growth in pedestrian volumes and creation of a broader scope of retailing activity which would attract customers with greater frequency and from a wider geographic area. A complete breakdown of these retail sales impact estimates is provided in Table 5-D.

The significance of the retail sales gains associated with the proposed action can best be understood in relation to the existing levels of retail trade activity occurring in the MetroCenter. The $52 million of increased sales volume that would be generated by the proposed action represents nearly a 30% increase over the existing sales volume of $185 million in the entire MetroCenter. Table 5-E summarizes the retail sales impact analysis.

Overall, the joint development project would represent a significant economic catalyst to the revitalization of the Retail District. In addition to its direct retail sales volume outlook for the entire MetroCenter. The demonstration of the public sector commitment to the Lexington Market Station area combined with new private sector investments would restore the confidence of existing merchants and encourage additional modernization and restoration activity.

TABLE 5-D

NET CHANGE IN RETAIL SALES IN EXISTING FACILITIES
GENERATED BY PROJECT ALTERNATIVES

Alternative	Facility Component	Space	Incremental Sales per Square Feet	Total Annual Sales Change
I. Proposed Action	On Site Dept. Store	65,000	$20[a]	$1,300,000
	Other Dept. Stores	600,000	$ 5[b]	3,000,000
	Mall Shops	25,000	$10[b]	250,000
	Subtotal	685,000		$4,550,000
II. "No-Action"	Other Dept. Stores	400,000	$5-10[d]	$3,000,000
	Loss of one Dept. Store[e]	-200,000	$45	-9,000,000
	Mall Shops	25,00	$ 3	75,000
	Subtotal	425,000		-$5,925,000

a-Higher sales through changes in merchandising and increased trade.
b-Proposed action assumes a residential component.
c-No increase in the amount of Lexington Mall shop space is credited.
d-This gain represents the impact of opening the Lexington Market Station and recapturing some of the departing store's trade.
e-Assumed on the basis of declining revenues and public statements by downtown department store officials.

SOURCE: Robert J. Harmon and Associates, Inc.

TABLE 5-E

TOTAL RETAIL SALES IMPACT
OF THE PROPOSED ACTION
($ millions)

Alternative	New Facilities	Existing Facilities	Retail Sales[a] Impact	Net Change
I. Proposed Action	$41.3	$4.6	$45.9	$51.7
II. "No-Action"	$ .2	-$5.9	-$ 5.7	-

[a]Annual Sales estimated in 1977 dollars

SOURCE: Robert J. Harmon and Associaties, Inc.

Employment

The employment impacts that would result from the implementation of the joint development alternative include: (1) employment changes in relocated or displaced stores; (2) interim construction employment gains; and (3) permanent retail employment increases in the Baltimore MetroCenter.

The employment in establishments subject to relocation is estimated at 150-180 full-time equivalent jobs (including some 100 in the impacted portion of Hutzler's). For purposes of the present analysis it is assumed that almost all of the affected stores would relocate or consolidate operations, with minimal long-term employment loss. The long-term potential employment loss associated with displacement would be limited to 8-12 employees in establishments which are presently considered marginal and may not choose to relocate and 10 or fewer associated with possible consolidations. Depending upon choice of store relocation sites, some of the 50-80 employees of existing small retail operations may also be subjected to inconvenience and increased commuting costs.

On a short-term basis, present employees of stores to be relocated would likely experience some disruption associated with the relocation process. The precise nature of such impacts are difficult to forecast; lost wages incurred during any business shut-down for actual moves could be offset by additional wages earned during inventory, closing sales, re-stocking at the new facility or other activities associated with relocation or consolidation. In all cases, advance notice of impending acquisition and relocation dates will be provided by the City as early as possible in order to minimize possible disruptions of employees.

The construction activity associated with the joint development project would generate approximately 400-600 man years[8] of employment. During the peak construction period (about two years), between 150-225 persons would be employed on the project.

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[8] Estimate based on 40% of construction costs required for labor and an assumed average annual payroll cost of $20,000 per employee.

The retail employment increases generated by the joint development project represent a mix of full and part-time positions. Based on national averages for employment per 1,000 square feet in retail, department store and entertainment space in urban locations,[9] the new retail facilities included in the proposed development plan represent the equivalent of between approximately 600-900 full time jobs. In addition, it is estimated that the increased retail sales[10] generated in existing nearby retail facilities would, at a minimum, create between 55-80 additional retail job opportunities in the Retail District. Under the "no-action" case there could be a net loss of between 500-600 jobs (based on the assumed closing of one addional Department Store). A complete breakdown of these employment impact estimates is provided in Table 5-F shown below.

TABLE 5-F

EMPLOYMENT IMPACT OF BALTIMORE GARDENS ALTERNATIVES

Alternative	Component	Employment	Net to "No-Action"
I. Proposed Action	Specialty Retail[a]	375	325
	Department Store[b]	340	940
	Restaurant, Theatre, ect.[c]	200	200
	Induced in Existing Facilities[d]	80	80
	Subtotal	995	+1545
II. "No-Action"	Discount Retail[a]	+50	
	Department Store[e]	-600	
		-550	

a-Weighted average of 1 employee per 350 sq. ft. based on sales volume.
b-Weighted average of 1 employee per 400 sq. ft. based on sales volume.
c-Based on payroll of 30% of gross sales at an average wage of $10,000.
d-Assume 86 - 90% efficiency of new sales to existing employee base.
e-Average of existing department store employment.

SOURCE: Robert J. Harmon and Associates, Inc.

[9]See "Estimating Land Floor Areas Implicit in Employment Projection", Volume I; prepared by Ide Associates, Philadelphia, PA for the US Bureau of Public Roads, 1972.
[10]See previous section of this Chapter for a discussion of retail sales volume measurement.

The difference of approximately 1500 retail jobs generated or maintained by the proposed action as compared to the "no-action" case represents an increase of 9-10% in the forecasted[11] size of the retail trade employment base of the entire MetroCenter. Of equal importance is the fact that a large portion of this employment will be available to center city residents and in the long-term, the positive influence of adding or retaining 1500 jobs in the MetroCenter will help to stabilize the economic base of nearby residential neighborhoods

Property Tax Base

The implementation of the joint development project would add a net increment of $8.0 million to the existing property tax grand list. At the time of the joint development project opening, it would generate roughly $600,000 in annual property taxes (at 1977 rates). During the construction period there would be a temporary property tax revenue loss in the amount of $121,200 (at current values and rates) from the land and structures to be acquired. Over the expected period of four to five years during which these properties would be removed from the property tax base, there would be a maximum interim loss of $600,000. This loss of property tax revenues would be recovered during the first two to three years the joint development project was in operation.

Beyond these predictable changes in the property tax base, it is expected that project implementation would (1) stabilize the declining property tax base[12] of the study area and (2) induce factors or investments which would further increase the values of adjacent properties. In contrast, under the "no-action" alternative, the probable loss of one additional department store would cause an absolute decline in total property base (i.e assessed values) and provide a disincentive for future private investment.

The estimated property tax gains resulting from the implementation of the proposed action represents a 27% increase over the current $30.4 million assessed property tax base of the core study area. This is a significant positive economic impact on the entire area.

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[11] See MetroCenter employee projections prepared by Morton Hoffman and Company for the Greater Baltimore Committee, August, 1977.

[12] Measured in 1977 dollars.

Municipal Service Impacts

Based on per capita solid waste generation rates by City residents and retail employees,[13] it is estimated that the total daily waste poundage from the proposed action would be on the order of two tons per day (25% from the residential units and 75% from the other project elements). Allowing for days when the retail stores are closed, the annual equivalent would be some 650 tons. Much of this waste will be hauled by private contractors and the amounts are so insignificant in terms of City-wide annual refuse tonnage (almost 2 million tons per year) that no impacts on solid waste disposal are envisioned. The design of the project facilities will ensure convenient access for delivery and refuse hauling vehicles.

The proposed project would place minimal long-term demands upon existing City services in terms of facilities, secondary public works or capital expenditures or manpower. The nature of the residential component (efficiency and one-bedroom apartments) is one that typically does not generate a high percentage of school-age children. Similarly, the anticipated residential population is relatively low (about 300 individuals) and would not be a type which places heavy demands on social, health or other service agencies.

Because of the higher activity levels in the areas, the increase in hours of evening operation and the number of stores opening on interior spaces, the requirements for police patrolling may be increased. During the construction period, additional police may be required for traffic control on adjacent city streets, but this need would be minimal, since several of the major intersections would already be manned because of MTA construction. Extension of Lexington Mall and other changes to the local circulation system would require changes in traffic signing and signalization and possibly the addition of a few curb-cuts and similar public works tasks. There are no requirements for significant street improvements, apart from the extension of the Lexington Street Mall, which can be identified at the present time.

The two-block extension of the Lexington Street Mall would necessitate the relocation of some of the utility lines located beneath the bed of the 300 and 400 blocks of West Lexington Street. However, utility service would be maintained during the construction period to each occupied property within the project construction area.

Overall, the proposed action represents a strong cost revenue return to the City. On this basis, the burden of any moderate increase in municipal service requirements related to the project would be insignificant.

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[13] Solid Waste Management Plan for the City of Baltimore, Roy F. Weston, Inc., January 1974.

5.4 Transportation Impacts

The proposed project would increase the localized activity level, by drawing additional people to downtown, increasing the length of stay of downtown employees and visitors, and servicing downtown residents. Except for the latter category, this increased activity would generate transportation impacts in terms of vehicular traffic, parking demand and public transportation. Each of these transportation impacts is discussed below.

Traffic

The existing traffic volume in the study area is currently about 180,000 vehicle trips per day (See Chapter 2.4). The most recent 5-year history in the Baltimore CBD (1970-75) shows a slight decline in such volumes (averaging -.2% per year). However, the City Planning Department anticipates that downtown employment growth and improved economic conditions will yield a small gain in traffic volumes between 1977 and 1982 (averaging 0.1% per year). The baseline traffic volume applicable to the "no-action" option is thus estimated at 181,000 vehicle trips per day in 1982. Under this alternative, traffic is expected to stabilize at this level for a number of years because the opening of the Section A rapid transit system should yield enough mode diversions to offset further traffic growth. Peak period traffic in the study area is expected to retain the existing general relationship to daily volumes (Peak hour = 8-12% of Average Daily Traffic (ADT)).

Thus, the 1982 traffic conditions projected under the "no-action" (baseline) alternative would be virtually identical to those discussed in Section 2.4 with some minor localized reassignments to accommodate the one-block extension of Lexington Mall.

Impact of Proposed Action

The increase in daily traffic volumes in the study area attributable to the proposed joint development project is projected to be an additional 5% over the baseline (1982) ADT. This increase is essentially of the same magnitude as the traffic decline which occurred in the study area between 1976 and 1978 as a result of the closing of the Hochschild-Kohn downtown store and its headquarters (i.e., the 1982 ADT with the proposed action would be approximately equal to the levels which existed in 1976). Given this equilibrium and the fact that the Baltimore Gardens oriented traffic will tend to be off-peak, no major traffic complications are envisioned.

Table 5-G presents a numerical analysis of the traffic generation, vehicle volumes, distribution and assignment of project induced traffic. The basic methodology for calculating traffic generation is via derivation of the net differences between the proposed scheme and the facilities it replaces. The basic generation rates for various categories are derived from historical data on regional retail centers[14] and then adjusted to reflect lower activity and sales levels typically found in a CBD. Mode-splits (car vs. transit) are then used to derive vehicle trips. The computations:

TABLE 5-G
EXISTING (1977) VEHICULAR TRAFFIC GENERATION
BY ESTABLISHMENTS ON BALTIMORE GARDENS BLOCK

Establishment	Usable Retail Square Footage	x	Shopper Generation Rate	x	Efficiency Factor	=	Person Trips Generated
Hutzler Bros.	300,000	x	80/1,000	x	.65	=	15,600
10 Retail Stores	25,000	x	20/1,000	x	.75	=	375
			Total trips generated				15,975
			@ 45% trips via car				x .45
			person trips via car				7,189
			@ 2 persons per car shopper generated				x .5
			two-way car trips				3,594
	1,250 employees (est.)		@40% car usage (1.2/car)				416
			current two-way vehicle trips				4,010
			conversion to traffic volume				x 2
			Total ADT contribution				8,020

SOURCE: Baltimore City Department of Planning and Robert J. Harmon & Associates, Inc.

Thus, it can be seen that the existing retail establishments on the project block contribute some 8,000 cars to the study area ADT (about 4.3% of the total). Using the same procedure, it is estimated that the vacated Hochschild-Kohn Complex (340,000 square feet) contributed about 8,600 car trips to the ADT when it was in full operation.

[14] Field studies by Barton-Aschman Assoc., Inc. (for the City of Baltimore) reflecting design day (10th highest of the year) activity.

The joint development facilities will replace a portion of the Hutzler's complex and the existing stores and will generate additional traffic as a function of both the extra usable square footage to be created and the increase in efficency resulting from higher activity levels, new facilities, drawing power and merchandise mix. (This improvement in generating power will also be felt by the remaining portion of the Hutzler's and is reflected in the calculations shown in Table 5-H).

TABLE 5-H
VEHICULAR TRAFFIC GENERATION - PROPOSED ACTION

Establishment	Usable Retail Square Footage		Shopper Generation Rate		Efficiency Factor		Person Trips Generated
Hutzler's (remaining portion)	240,000	x	80/1,000	x	.85	=	16,320
New Department Store	200,000	x	80/1,000	x	.90	=	14,400
Specialty Retail	131,000	x	20/1,000	x	.95	=	2,490
Entertainment	60,000	x	20/1,000	x	1.0	=	1,200
Residential	200,000	x	2/1,000	x	1.0	=	400
			Total trips generated				35,010
			@ 45% trips via car				x .45
			person-trips via car				15,755
			@ 2 persons per car				x . 5
			Generated car trips				7,877
			2,200 employees @ 40% car usage (1.2/car)				733
			Scheme D two-eay car trips				8,610
			Conversion to traffic volume				x 2
			Total ADT contribution				17,220

SOURCE: Baltimore City Planning Department - Robert J. Harmon & Associates, Inc.

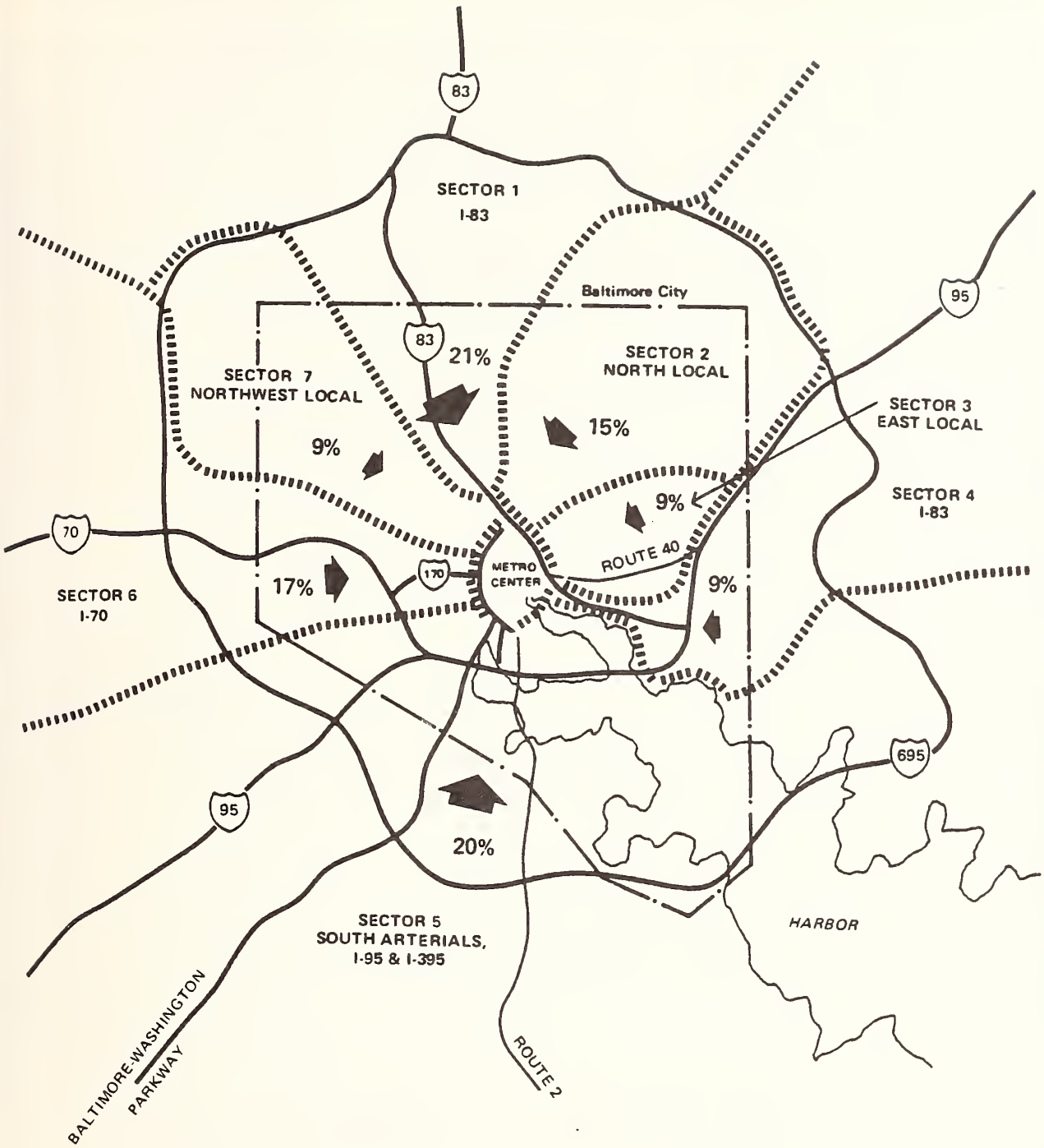
The net traffic increment is thus projected to be some 9,000 one-way vehicle trips per day (17,200-8,020). This is equivalent to 5.0% of the anticipated baseline ADT in the 24 square block study area in 1982. Allowing for a balance between additional long-term growth in attraction of the Baltimore Gardens shops, and expansion of transit facilities and ridership, a figure of 5% appears reasonable as an impact estimate. It should be noted that the projected net increase attributable to the project is only slightly higher than the loss in traffic incurred between 1976 and 1978 (9,200 vs. 8,600). Thus, overall traffic conditions with the project should be essentially equivalent to those existing in 1976, a time when no significant problems were observed.

On the basis of population density distributions and access times to the project site from various sectors of the city and suburban areas, it is possible to estimate the distribution of trips generated from each sector (See Figure 5-2). Using these distributions it is estimated that the average vehicle trip to Baltimore Gardens would be 8.7 miles in each direction. If all of these trips were induced by the project the resultant increase in daily vehicle-miles-of-travel (VMT) would be 80,400 (8.7 x 2 x 4,600). Many of these trips would represent diversions of employment or shopping trips formerly made to other locations and a more realistic estimate would be one-half this figure (40,200); however we will use the larger, more conservative figure (80,400) for air quality analysis. This value represents an increase equivalent to about 1.2% of the City's projected 1982 total VMT level of over 6.7 million per day.

Evaluation of the localized traffic impact requires consideration of the arrivals and departures and the modes used during different periods of the day. These data are shown in Table 5-I. It should be noted that the arrival and departure percentages under each mode are not equal; this reflects the fact that not everyone's arrival trip pattern is the mirror image of their departure mode (i.e., due to intermediate stops, non-home-based trip origins, rendezvous with friends, etc). The "other" category consists primarily of car intercepts (i.e., dropping/picking up of passengers by cars already included in the baseline traffic count, with no detours or extra travel involved).

As shown in this table, 45% of the daily person trips are made via car and the highest levels of vehicle activity occur between 2-4 p.m. and after 6 p.m., both periods which are before and after the existing peak traffic period of 4:30-5:30 p.m.

As calculated above, the net trip generation of the proposed project amounts to some 19,000 person trips per day (35,010-15,975) and 9,200 one-way vehicle trips (4,600 arrivals and 4,600 departures). Applying the percentages set forth in Table 5-I to this trip generation level yields the following net increases in vehicular traffic during the period of the greatest activity:



ENVIRONMENTAL IMPACT STATEMENT CITY OF BALTIMORE: THE LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT

FIGURE 5–2

REGIONAL DIRECTION OF APPROACH

SOURCE: BARTON–ASCHMAN ASSOC., INC.

TABLE 5-I

EXPECTED TIME AND MODE OF ARRIVAL/DEPARTURE PATTERN (WEEKDAY)

TIME OF DAY		% OF DAILY ONE-WAY TRIPS	MODE (% OF DAILY ONE-WAY TRIPS)			
			CAR	TRANSIT	WALK	OTHER
Before 10 A.M.	Arrive	4 1/	0.8	2.4	0.4	0.4
	Depart	1 2/	0.3	0.3	0.4	•
10 - 12 Noon	Arrive	14	8.4	2.8	1.4	1.4
	Depart	10	4.0	4.0	2.0	•
12 - 2 P.M.	Arrive	25	2.5	3.8	18.8	•
	Depart	30	4.5	3.0	22.5	•
2 - 4 P.M.	Arrive	17	11.0	2.6	1.7	1.7
	Depart	10	4.0	3.0	2.0	1.0
4 - 6 P.M.	Arrive	15	3.8	2.3	4.5	4.5
	Depart	18	7.2	5.4	1.8	3.6
6 - 8 P.M.	Arrive	17	11.0	2.6	1.7	1.7
	Depart	9	6.6	2.8	0.6	1.1
8 - Closing	Arrive	8	7.2	0.8	•	•
	Depart	22	18.0	2.0	•	•
Total	Arrive	100	44.7	17.3	28.5	9.7
	Depart	100	44.6	20.5	29.3	5.7

1/ Employees

2/ Residents

Source: Robert J. Harmon & Associates, Inc.

2-4 p.m.	arrivals:	.25* x 4,600 =	1,150
	departures:	.09 x 4,600 =	414
			1,564
	average of	763 vehicles per hour	
4-6 p.m.	arrivals:	.09 x 4,600 =	414
	departures:	.16 x 4,600 =	736
			1,150
	average of	575 vehicles per hour	
6-8 p.m.	arrivals:	.25 x 4,600 =	1,150
	departures:	.15 x 4,600 =	690
			1,840
	average of	920 vehicles per hour	
8-11 p.m.	arrivals:	.16 x 4,600 =	736
	departures:	.40 x 4,600 =	1,846
			2,576
	average of	860 vehicles per hour	

* Time span's percentage of total arrivals via car (11% ÷ 44.7% = .246%)

Thus, while the baseline P.M. peak hour (4:30-5:30) traffic amounts to 10-20% of the total study area ADT (some 20,000 cars), the project-related traffic increase during that same hour is only about 575 cars (6% of the project total and an increase of less than 3% over the baseline peak hour).

In contrast, the project will generage its highest traffic volumes, 860-920 cars per hour during the 6-8 p.m. and 8-10 p.m. time periods. This evening peak is due to: evening shopping activity; restaurant and entertainment patronage; and the cluster of shopper and employee departures that will take place as retail stores close. At that time, the baseline traffic throughout the study area is only 2-3% of the ADT volume (about 4,000 vehicles per hour).

During the evening hours, the project related traffic would represent an increment of some 25% over baseline conditions in the study area - yet the overall impacts are not considered significant, inasmuch as the combined (baseline + Baltimore Gardens) traffic volume during the late evening hours is still only about one-fourth of the baseline peak and 3% of the total baseline ADT.

Determination of the specific arterials and local streets most directly affected by Baltimore Gardens traffic must consider the proportional splits in direction of approach, the feeder road and local circulation networks and the location of parking entrances/exits. Based on these factors, the anticipated distribution of inbound shopper traffic to the study area perimeter is shown on Figure 5-3. This distribution assumes completion of City Boulevard, but without a direct linkage to I-83 (Jones Falls Expressway).

As it approaches the perimeter of the study area, traffic would use a variety of local streets to approach the site and its parking facilities. The major approach roads to the study area perimeter would be Mulberry and Baltimore Streets (from the west), Eutaw and Howard Streets (from the north), Saratoga and Fayette Streets (from the east) and Paca Street (from the south). Given the small incremental volumes and off-setting peaks discussed above, no significant congestion or capacity problems are envisioned on these links.

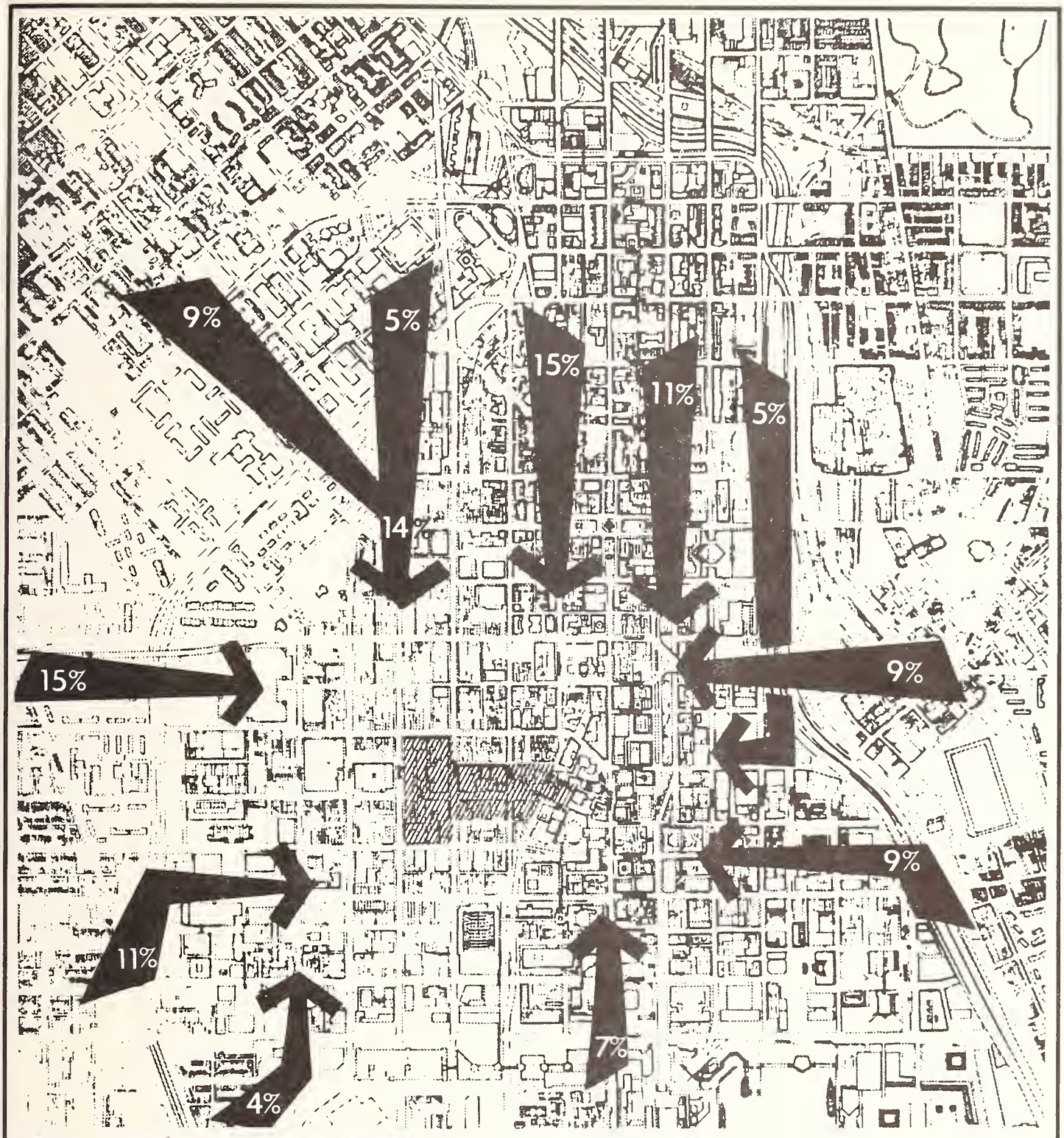
Eventually, most of this traffic would funnel into Saratoga, Eutaw or Paca Streets near the site to enter one of the parking facilities, and it is at these points that the most noticeable localized impacts will occur, especially on peak activity days. The worst traffic peak would probably occur at the time of store closing on such a day, when as many as 1,000 cars may attempt to leave the garages within a short time span. During that 30-40 minute period, traffic on Saratoga and Eutaw Streets would be at the same level as during the 4:30-5:30 peak. Adverse impacts in the vicinity of parking access/exit points will be minimized via detailed location planning and design of multiple lane facility entrances/exits, limitations on left turn movements, signing and signalization programs. The air quality impacts resulting from this peak period and mitigating measures are addressed in Section 5.5.

The two-block Lexington Street Mall extension would close the street to all vehicular traffic save for service and delivery vehicles. Lexington Street between Howard and Paca Streets (the portion of the street to be converted to an extension of the existing Mall) carries primarily local traffic with through traffic utilizing Fayette Street (westbound), Mulberry Street (eastbound), and Saratoga Street (two-way). For local circulation, traffic could continue to use Saratoga, Howard, Fayette, Paca and Eutaw Streets.

Parking

The Baltimore City Department of Planning and the City of Baltimore's Off-Street Parking Commission have prepared an updated study of Metro Center parking needs for the 1980 and 1985 time periods.[15]

[15] Joseph P. McGee and Associates, Inc., Baltimore Metro Center Parking Study, Phase I Report, Parking Inventory and Demand Analysis, prepared for the Baltimore Department of Planning, Oct. 1977.



ENVIRONMENTAL IMPACT STATEMENT
CITY OF BALTIMORE:
THE LEXINGTON MARKET STATION
JOINT DEVELOPMENT PROJECT

FIGURE 5-3

DISTRIBUTION OF INBOUND SHOPPERS TRAFFIC

SOURCE: BARTON-ASCHMAN ASSOC.

The findings of this study, as noted in Chapter 2 of this EIS, indicated a current surplus of long-term parking spaces in the study area. However, the parking survey also indicated a significant current deficit of short-term spaces within the study area. Including consideration of the impact of the closing of Stewart's Department Store, the 1979 deficit of short-term parking has been estimated at approximately 1,000 spaces. As also noted in Chapter 2, approximately 70% of the existing inventory of 4,200 long-term spaces in the study area are located in parking structures which evidence a high degree of functional obsolescence, as these structures cannot be structurally adapted to public self-parking operation for either short or long term parking.

The projected 1980-82 relationship between long-term parking supply and demand in the study area is consequently viewed as being in effective balance, after consideration of functional obsolescence and the opening of the new Social Security Administration Office Complex in 1979.

The 1979 estimated deficit of approximately 1,000 short-term spaces has been projected under the No-action alternative, to be reduced to an effective deficit of 800 spaces by 1982, due to continued decline of retailing activity in the study area.

Under the Proposed Action, but without consideration of the effect of transit on parking requirements, the incremental parking demand in the study area (e.g., Proposed Action versus No Action) is projected to increase by some 1,300 spaces (800 short-term shopper/visitor spaces, 300 long-term spaces for employees, and 200 spaces for residential use).[16]

Existing zoning regulations applicable to the study area and project site require one parking space per each 1,000 square feet of office floor area, above the first 50,000 square feet of floor area. There is no minimum zoning requirement for parking for retail facilities in the study area. One parking space is required for each new residential dwelling unit.

Within the limitations of existing data and experience, the potential effect of transit in significantly reducing parking demand has been considered. It is important to note that the Section A/Phase I Baltimore Region Rapid Transit System will serve only the Northwest Corridor of Baltimore City. Consequently, it can be viewed as offering a "transit alternative" to 15-25% of the shoppers, visitors, and employees travelling to the study

[16] Based on a weekday peak demand of 2.2 spaces per 1,000 square feet of commercial floor area, one space per dwelling unit and .4 space per full-time equivalent employee.

area from outlying locations. In addition, it has been assumed that expanded and improved bus service to the study area will effectively offer this alternative to an additional 25% of future users. In view of previous national experience, the effect of transit is anticipated to be more significant in reducing the need for long-term spaces than in reducing the need for short-term spaces. A potential for reducing long-term space requirements by 50% and short-term space requirements by 25% has been considered. The effect of transit as an alternative is also greatest within walking distance of a transit station, which has been given additional consideration in terms of parking within the proposed project site.

However, failure to provide parking adequate to meet minimum levels of generated demand would be totally unacceptable from the standpoint of both the City and the private developer investing equity capital in the project. No developer would undertake a retail project of this magnitude without assurance that sufficient, dedicated parking was available on-site or directly adjacent to the site.

The Proposed Action thus provides for the development of 400 new parking spaces within the proposed project site area, including provision for both short-term (approximately 200-250) and long-term (approximately 150-200) spaces. These requirements represent, respectively, 50% and 30% reductions in the long and short-term additions to supply expected for the project site prior to consideration of transit. Final decision on the design and location of parking facilities on the project site have not been made. Consideration has been given to the development of an air rights parking structure above the northwest quadrant of the project site, and to the development of a continuous below-grade parking structure both north and south of Clay Street. Final decisions on the precise location and distribution of parking facilities will be made jointly by the City and the developer during the final design period. It is important that the joint development project site have sufficient parking to mitigate against significant spill-over demand upon surrounding parking facilities. In addition, existing parking structures in the study area will be given additional evaluation for feasible renovation particularly the Lexington Market Parking Garage, in order to provide sufficient overall parking within the study area.

Parking facilities will be designed and located so as to minimize negative effects on vehicle or pedestrian movements on the interaction of such movements.

Public Transit

Table 5-K indicates that 17.3% of arrivals and 20.5% of departures will be via public transit. This mode-split translates into some 3,400 new daily transit arrivals and 4,000 new daily transit boardings at/near the site (not including transit riders employed in downtown who may stop at the complex during the day). Applying the results of recent MTA studies, 20% of these transit patrons would be expected to use the rapid transit system (Section A). The increase in boardings at the Lexington Market Station would amount to 800 riders per day (a 6% increase over the baseline boarding volume which is projected at 14,200 daily station boardings).[17] The remaining 3,200 new transit patrons would ride transit buses.

In view of the off-peak nature of most of this transit ridership, the impact on public transit will be positive. The increased patronage will yield higher revenue without generating offsetting cost increases. Given the distribution of bus patrons throughout the day, the number of routes passing within two blocks of the site and the frequency of service (see Figure 2-13) it is anticipated that the additional bus passengers can be accommodated without expansion of service or capacity (the increased volume is equivalent to some 160 additional riders per day on each route serving the area).

[17] Station by station patronage forecast developed by the MTA (1975)

5.5 Natural and Physical Impacts

Analysis of the proposed joint development project in comparison with existing conditions and the "no-action" baseline option indicates that the proposed project would have certain impacts on the natural and physical environment. The magnitude of such impacts is minimized due to: (1) the existing urbanized nature of the project area and its environs; (2) the fact that the project would replace larger existing structures; (3) the relatively modest magnitude of the development within the context of MetroCenter activity; and (4) the overlap of proposed project construction with MTA's ongoing rapid transit construction. Specific impact dimensions of concern are described below.

Storm Water, Drainage and Water Resources

The proposed project site is totally developed and thus neither preferred alternative would involve creation of additional run-off areas or the elimination of natural drainage areas. Site grades will require consideration of collection and channelization of storm waters in project design, but this poses no unique or special problems. The proposed site is served by an extensive storm sewer network (separate from the sanitary sewers) and this system has historically been adequate to handle flows from the existing site use and no capacity problems or requirements for upgrading are envisioned. None of the storm sewer mains cross the project site; thus, construction would not require relocation of existing network links or interruption of service beyond any required for the transit system. The cumulative surface flow of water along Eutaw Street towards the Lexington Street Mall (extension) from the south side of Saragtoa Street would be a maximum of 27.2 feet 3/second (12,208 gallons/minute) during a 50-year storm. The transit system facilities are designed to handle a 50-year storm.

The site is not in a flood hazard area as defined by the Federal Flood Insurance Program and has never experienced a flood problem.

During demolition, excavation, and construction, erosion of exposed soil and materials presents a potential source of siltation and debris which could clog storm sewers and/or increase pollutant levels in the outfall. Safeguards against such occurrences, in the form of an erosion control program and requirements for on-site sedimentation, trash and debris control are mandated and monitered by State and City ordinances[18] and

[18] City of Baltimore, Ordinance #1013, as amended, March 29, 1971; Paragraph 2203 of Chapter 22 of Article 32 of the Baltimore City Code.

will be imposed upon developers and their construction contractors. Applicable measure include: channelization of run-off, retention basins and sedimentation traps, ground stabilization, and construction scheduling.

There would not be any significant water-related impacts as a result of the proposed action. The project would not have any impacts on existing or potential sources of water supply, or demand rates. The project would require some 100,000 gallons per day which is about twice that required in 1975, when all existing structures on the block were occupied, but negligible in contrast to the 110.6 million gallon per day demand which the water distribution system for the project zone handles without difficulty. The project area is served by a main located under Saratoga Street. This segment is part of the First Zone of the Baltimore Water Distribution System which has ample capacity to meet the project needs as well as the expected CBD demand through the year 2000. (See Chapter 2 of this statement).

No recent on-site boring data to permit precise determination of ground water levels is available. However, the presence of tunnels and conduits under existing foundations on the site and borings taken for subway tunnel construction adjacent to the site, both indicate ground water level is well below 80 feet and therefore dewatering will not be necessary for this project.

Project construction would not require relocation or disruption of significant elements of the water distribution system at any point outside of the joint development project site. Relocation and connections within the block itself will be dictated by final design and will be scheduled in terms of the MTA construction schedule and implemented so as to prevent temporary interference with existing users or contamination of supply.

Wastewater Collection and Treatment

Based on City-wide usage patterns and projections, the anticipated waste water generation rate would be in the range of 100,000 gallons per day (30-40% of this from the residential units and the rest from retail/entertainment and

public space). This rate is negligible when compared to the current 40 million gallon per day flow rate to the Eastern Avenue Pump Station servicing the area. This rate is still some 30 million gallons per day below the Station's capacity. The main sewer line in the vicinity of the site is a 15-inch line under Howard Street branching to the east under Clay Street. This line also has sufficient excess capacity to handle the projected flows with ample reserves. It is not expected that any unusual or problem pollutants would be discharged into the City's sewer system as a result of this project.

Since no major sewer lines cross the site and relocation of local connections will be coordinated with the MTA's rapid transit construction program, the off-site impacts of construction activity and sewer tie-ins should be minimal.

Disposal of Excavation, Demolition and Construciton Materials

The excavation of the site and demolition of existing structures will generate approximately 77,300 cubic yards of excavated material (primarily reddish brown, moist, fine to medium gravel and fine to coarse sand) and approximately 37,000 cubic yards of demoliton debris. Some of the materials, e.g. structural steel, piping, etc., may be recyclable and the rest will be disposed of in approved landfill areas. No City Ordinances cover the transport of such materials, but the terms of construction contracts and excavation and building permits and permits issued by the City's Department of Traffic and Transit will establish constraints on truck routes, use of covered vehicles, time of shipments and approved disposal locations so as to mitigate any adverse impacts on the environment or adjacent activities.

Vegetation and Animal Life

The site of the proposed project is currently devoid of any vegetation. The extension of Lexington Mall and creation of the Southeast Entrance Plaza would incorporate an extensive landscaping plan with ample opportunities for plantings of flowers, shrubs and trees, and,thus, would provide a positive impact. The only animal life in the area consists of pigeons, starlings and other birds indigenous to urbanized areas, and probably a population of rodents and insects of various types. The replacement of old buildings with unused upper stories by new structures should reduce the available habitats for such species and can be considered a positive impact.

Noise

The anticipated passenger vehicle traffic increases associated with the proposed joint development project amounts to an increment of 5% of total daily volume within the study area. This is not sufficient to generate any measurable or perceivable change in the overall ambient noise environment.

Similarly, the project is not expected to significantly increase the frequency of bus operations or to generate requirements for delivery trucks which are significantly greater than those servicing current and recent retail operations on the block. This negligible area-wide impact, together with the small (less than 1%) projected increase in study area traffic between 1977 and 1982 indicates that the general noise levels described in Chapter 2 of this Statement will not be affected over the long-term by the "no-action" option or either of the preferred schemes.

The offsetting relationship between existing periods of peak traffic and the patterns associated with the proposed project serve to further reduce any potential noise impacts. The joint development employee traffic will arrive in the area after the morning peak period and disperse at varying times during the day and evening (depending on working schedules, proportion of part-time employees, etc.). The shopper and visitor traffic is expected to peak in the late morning, mid-afternoon and evening hours (after 6 P.M.). In addition, the project elements will likely serve as focal points for after-work activities by downtown office employees, which will serve to further smooth the current peaking pattern.

Depending upon the circulation and parking access/egress configurations emerging from the final design, larger project-related increments of traffic may occur at certain times of day along Eutaw, Paca and Saratoga Streets in the vicinity of the site. This traffic could raise the noise levels in the immediate vicinity slightly; approximately 1dB during the afternoon peak and by no more than 2-3dB during later (early evening) hours. (See Chapter 2.7 for a discussion of measured noise levels in and around the project site area). Such increases are still below the threshold of perception in an urbanized environment and within the error limits of the accepted measurement procedures.

The primary noise-sensitive receptor impacted by evening ambient noise levels (with L10 levels of 76-78 dBA for short periods) would be the residential units atop the joint development project. The adverse impacts would be attenuated inasmuch as even the lowest floor of the residential units would be elevated some 3-4 floors above street level and by the use of sound insulation materials in the construction of the units.

A noise-sensitive land use in the vicinity of the project site is St. John's Church and Parochial School at the corner of Paca and Saratoga Streets. This complex is on the fringes of the area of any potential noise increase and the effects projected would be minimal since any increased traffic noise would occur when the school is not in session (after normal school hours and on Saturdays and Holidays).

During the construction of the facility, noise will be generated by the various pieces of construction equipment and operations. Table 5-J shows typical construction equipment and associated noise levels.

TABLE 5-J
A-WEIGHTED LEVELS AT 15 METERS (49.20 ft.) FROM TYPICAL CONSTRUCTION EQUIPMENT

Equipment	Range of A-weighted levels (db)
Earth movers	
Front loaders	72-84
Backhoes	72-93
Tractors	76-96
Scrapers, graders	80-93
Pavers	86-88
Trucks	82-94
Material handlers	
Concrete mixers	75-88
Concrete pumps	81-83
Cranes (movable)	75-86
Cranes (derrick)	86-88
Stationery	
Pumps	69-71
Generators	71-82
Compressors	74-86
Impact	
Pneumatic wrenches	83-88
Jack hammers and rock drills	81-98
Pile drivers (peaks)	95-105

SOURCE: Environmental Noise Control, Magrab, 1975.

In view of the high noise levels and vibration associated with pile driving operations, the MTA has specified that all tunnel and station contractors in this area must use augers rather than pile drivers. The joint development project construction would operate under the same restrictions and thus eliminate the worst potential noise hazard. Faulty and ineffective mufflers on construction equipment are a major cause of excessive noise due to construction operations. Many stock mufflers are available for construction equipment that can provide significant reduction of exhaust noise emission levels. Construction contractors would be required to inspect and maintain engine exhaust mufflers on all construction equipment on a regular basis to minimize extraneous noise.

Hauling of materials would be handled in such a way that noise sensitive areas such as hospitals, schools, and residential areas are avoided. The routes to be used for hauling and the permitted hours for such operations would be designated and controlled by the City. Given the absence of existing residential land use in the immediate vicinity of the site, it may prove beneficial to schedule demolition in the evening hours when adjacent activity is at a minimum.

A more detailed evaluation of construction noise impacts will require specific information on construction techniques, staging and schedules, which in turn will depend on the final design. The City has adopted a noise ordinance[19] which establishes maximum sound levels permitted in various land use zones and provides for modification and enforcement of these standards. The provisions of this ordinance do not apply to the construction or demolition of a structure or to individual motor vehicles until specific standards for such sources are established by the City Health Commissioner. Preparation of such standards is in process and, when completed, would apply to the proposed project.

The demolition and construction noise impacts of the development project would partially overlap the Mass Transit Administration's construction activity in the area. The net result of this overlap would be to raise the overall ambient noise levels slightly, but to diminish the perceptibility of the incremental noise created. The impacts of construction noise would be felt primarily by the merchants fronting on Howard, Lexington, and Eutaw Streets adjacent to the project site and by shoppers and pedestrians in the immediate vicinity.

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[19] Ordinance No. 108; Sections 271-285 (Noise Control), Article II, (Health) of the Baltimore City Code.

Air Quality

Overview and Methodology

The projection of air quality impacts is based on modeling and analysis emphasizing two factors: (1) the anticipated background emissions from mobile and stationary sources at the time the proposed project would be in full operation and (2) the incremental impact of the higher density development on air quality in the region and the project site and its immediate environs.

The proposed action is compared with the "no-action" option to represent the "worst case" from the standpoint of air pollution potential. Similarly, the base years chosen for air quality analysis were 1985 for direct impacts of the project itself and 1995 for induced (secondary) development effects. These years represent periods of full-scale operation and, thus, the points of maximum possible impact.

The analyses were performed on two spatial scales: (1) a citywide macroscale analysis of emissions of carbon monoxide (CO), hydrocarbons (HC) and nitrogen oxides (NOx) from mobile and stationary sources: and (2) a localized analysis of carbon monoxide concentrations at monitoring stations closest to the project vicinity.

A computer program (VEHEMI)[20] was utilized to calculate motor vehicle emission rates. VEHEMI is designed to compute the emission rate (grams CO/vehicle mile) for a specified motor vehicle model year or mix.[21] In this study, a mix typical of Baltimore City was used.[22] The program also allows for explicit input of the ratio of light-to-heavy-duty vehicles and peak and off-peak speeds for each primary link in the study area. The emission factors used incorporate such considerations as emission control systems deterioration and speed adjustment factors. Also, recent legislation by the U.S. Congress extending the 1977 automobile emission standards has been incorporated into VEHEMI. Traffic parameter information for the Baltimore area, as used in the emission factor calculations, is summarized in Table 5-K.

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[20] Developed by the Walden Division of Abcor, Inc. Wilmington, Mass., the firm which assisted in preparation of this section.

[21] Travel and Environmental Changes through 1985- An extra polation of Past Trends, Special Report #3, Baltimore Region 3-C Transporation Process, Maryland Department of Transportation, Regional Planning Council, Dec., 1976.

[22] Light-duty vehicles are rated at 6000 lbs. gross vehicle weight or less; heavy-duty vehicles exceed 6000 lbs.

TABLE 5-

TRAFFIC PARAMETER INFORMATION FOR BALTIMORE CITY

Alternative	Year	24-Hour Vehicle Mix (%)	24-Hour VMT	Peak Vehicle Mix (%)	Peak VMT	24-Hour Speed (mi/hr)	Peak Speed (mi/hr)
Existing Conditions	1975	LVD 92.5	5,701,700	93.5	1,301,500	22.4	19.9
		HDV 7.5	462,300	6.5	83,500	22.4	19.9
"No-Build" (Baseline)	1985	LVD 92.4	6,214,000	93.2	1,304,000	23.0	20.9
		HDV 7.5	504,000	6.8	88,400	23.0	20.9
	1985	LVD 92.6	6,294,000	93.7	1,302,000	23.0	20.8
		HDV 7.4	505,000	6.3	88,400	23.0	20.8

VMT: Vehicle miles traveled
LDV: Light duty vehicles
HDV: Heavy duty vehicles

SOURCE: Baltimore City Planning Department, Regional Planning Commission and Robert J. Harmon and Associates, Inc.

The resulting emissions factors obtained by this methodology are summarized in Table 5-L. Emissions factors for each pollutant are distributed by calendar year and vehicle speed. These factors reflect vehicle mix by model year, weighted travel by age of vehicle and the deterioration of control devices as a function of model year and age. Also included are the split between light and heavy-duty vehicles on each roadway and the comparative effect of the proposed Transportation Control Plan which contains inspection and maintenance program and heavy-duty gasoline vehicle retrofit.

A decrease in automobile emissions can be expected between 1975 and 1985 for several reasons:

- Newer models with emissions controls will increasingly replace the older (uncontrolled) vehicles. As an example, CO emissions for controlled vehicles are approximately 96 percent less than those for uncontrolled vehicles.

- Additional transportation controls will be imposed as part of a state Transportation Control Plan (TCP). As discussed in Chapter 2, (Section 2.6), elements of the proposed plan which are expected to be retained in the approved plan, include: (1) an inspection and maintenance (I/M) program to insure that the engines and control devices of vehicles are maintained in proper order and (2) retrofitting pre-1978 heavy-duty gasoline vehicles with additional control devices. I/M is expected to decrease CO and HC emissions by ten percent for all vehicles and NOx emissions of post-1977 vehicles by three percent. Retrofitting will reduce heavy-duty vehicle emissions by 40-70 percent depending upon the control devise used.

Stationary sources in the Baltimore area contribute only seven percent of the total amount of carbon monoxide emitted into the atmosphere.[23] Most of this contribution comes from manufacturing industries. Due to controls imposed on emissions from industrial process heating, solvent usage, and gasoline storage and handling promulgated by the EPA and the Maryland

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[23]Maryland Dept. of Health and Mental Hygiene, Environmental Health Administration, Bureau of Air Quality and Noise Control, 1975 Emissions Inventory Report, March, 1976.

TABLE 5-L

POLLUTANT EMISSION FACTORS (GRAMS/VEHICLE-MILE) FOR CALENDAR YEARS 1975 and 1985 FOR BALTIMORE CITY

Year	Speed (mi/hr)		Percent LDV*	Percent HDV**	Pollutant Emission Factor (grams/vehicle mile)					
					Carbon Monoxide+		Hydrocarbons++		Nitrogen Oxides	
					LDV	HDV	LDV	HDV	LDV	HDV
1975	Average:	22.4	92.5	7.5	46.7	83.4	6.8	12.3	5.0	17.8
	Peak:	19.9	93.5	6.5	52.2	92.4	7.2	13.3	4.9	17.1
1985	Average:	23.0	92.5	7.5	6.6	58.8	1.6	6.2	2.2	18.4
	Peak:	20.9	93.2	6.8	7.8	67.7	1.7	6.8	2.1	17.6

* LDV: Light Duty Vehicles
** HDV: Heavy Duty Vehicles
\+ Includes effects of typical TCP controls; inspection/maintenance program and heavy-duty gasoline vehicle retrofit.
++ Includes exhaust, crank case, and evaporative emissions.

SOURCE: Walden Division of Abcor, Inc.

Bureau of Air Quality Control for the metropolitan Baltimore Intra-State Air Quality Control Region (AQCR), stationary source pollution in the City of Baltimore is assumed to remain at the base year (1975) level until 1985.[24]

Marcroscale Analysis

The macroscale analysis examined changes in mobile source emissions alone, and the incremental relationship of these changes to the total of mobile and stationary source emissions. The quantity of each pollutant released from motor vehicles within the project's area of influence for each alternative was estimated through the application of the motor vehicle emissions factors to the projected traffic volumes. Daily and 8-hour vehicular emissions of carbon monoxide, hydrocarbons, and nitrogen oxides were calculated for the various alternatives by this procedure. Table 5-M presents the average daily and peak (3-hr.) emissions from mobile sources for each alternative. The results are based on the specific traffic estimates, road speeds, and emissions factors appropriate to each case.

In comparing the "no-action" alternative to the (1975) existing conditions, the emissions data indicates that total mobile source emissions for all three pollutants will decrease significantly between 1975 and 1985. Comparison of the most recent data with the data projected for 1985 indicates that the daily average mobile emissions for CO will decrease by almost 77 percent. Hydrocarbon and nitrogen oxide emissions decrease by 71 and 37 percent, respectively. Peak 3-hour emissions also decrease approximately by the same amount as the 24-hour emissions. Thus the overall air quality in the City by 1985 will be significantly improved over the present conditions.

Table 5-N presents average daily total (mobile and stationary) emissions of carbon monoxide, hydrocarbons and nitrogen oxide, 1-and 8-hour emissions for CO, 3-hour emissions for HC and annual emmissions for NOx for each alternative. Comparison of the proposed action with the "no-action" case indicates a projected 0.4 percent increase in CO emissions during a 24-hour period in the year 1985. The corresponding increases in HC and NOx emissions are 0.1 and 0.3 percent, respectively.

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[24] Ibid.

TABLE 5-M

SUMMARY AVERAGE DAILY AND PEAK 3-HR EMISSIONS FROM MOBILE SOURCES FOR EACH ALTERNATIVE AND DESIGN YEAR

Alternative	Year	Pollutant Emissions: Carbon Monoxide (tons/24 hrs)	Carbon Monoxide (tons/3 hrs)	Hydrocarbons (tons/24 hrs)	Hydrocarbons (tons/3 hrs)	Nitrogen Oxides (tons/24 hrs)	Nitrogen Oxides (tons/3 hrs)
Existing	1975	670.1	154.8	97.8	21.5	80.8	16.0
No-Action	1985	156.2	36.0	28.6	6.2	50.6	9.7
Proposed Action	1985	158.1	36.0	29.0	6.2	50.0	9.6

Note: Emissions are reported in tons (short).
SOURCE: Walden Division of Abcor, Inc. and Robert J. Harmon & Associates, Inc.

TABLE 5-N

SUMMARY OF TOTAL EMISSIONS (MOBILE AND STATIONARY) FOR EACH ALTERNATIVE AND DESIGN YEAR

Alternative	Year	Pollutant Emissions: Carbon Monoxide (tons/hr)	Carbon Monoxide (tons/24 hrs)	Carbon Monoxide (tons/8 hurs)	Hydrocarbons (tons/24 hrs)	Hydrocarbons (tons/3 hrs)	Nitrogen Oxides (tons/24 hrs)	Nitrogen Oxides (tons/year)
Existing	1975	53.6	717.0	310.0	161.4	29.4	127.5	46,537
No-Action	1985	14.2	203.1	84.7	92.3	14.4	97.2	35,491
Proposed Action	1985	14.2	205.0	85.0	92.7	14.5	97.6	35,724

SOURCE: Walden Division of Abcor Inc. and Robert J. Harmon & Associates, Inc.

Projected Ambient Concentrations at Nearby Monitoring Stations

Projected concentrations of carbon monoxide were computed at the two monitoring stations in the Baltimore City area closest to the proposed site (See Chapter 2,Figure). Of these monitoring stations, AIRMON 1 and 200 Read Street are located within half a mile from the Lexington Market Station in a southwesterly and northerly direction, respectively. Projected air quality at these stations is presented in Tables 5-Q and 5-R and reveals the following:

- Under "no-action" conditions, CO concentrations in the City will decrease by approximately 73 percent by the year 1985 compared to the base year of 1975.

- As a result of the construction of the proposed new development, the CO concentration would be about 7 percent higher in 1985 compared to the "no-action" case (under the proposed action, the 1975-1985 improvement in CO concentrations would decrease from 73% to 72% of 1975 levels).

Site Adjacent Emission Concentrations

The peak project-related traffic volumes would occur sometime between 6 p.m. and closing time (between 9 and 11 p.m. for various facilities in the complex) when a projected average of between 860 and 920 cars per hour would be found at or near the site. From an air quality standpoint, the major concern would be the peak of 800-900 cars exiting from on-site and adjacent garages at store closing times. Because of cold starts and possible periods of idling while waiting to exit the garage these vehicles would generate somewhat higher emission levels than moving traffic.

The precise analysis of CO emissions generated by such vehicle activity would require relatively detailed information on the physical configuration of the parking structure(s) - including the number and square footage of floors, the locations and throughput capacity of entry and exit points, and the

characteristics of the ventilation and circulation system, none of which are available at the present time. However, it is possible to arrive at a very gross estimate of the "worst case" on the basis of certain assumptions.

In terms of the CO emissions generated at the criterion point (10 meters horizontal distance from exterior wall and 2 meters vertical distance above the street level), the worst case would be a single one-story street level garage with minimum vertical ventilation. If it is assumed that 50% of all vehicles departing from the garage are subjected to "cold start" conditions (parked for at least three (3) hours prior to ignition) and that the average car requires five (5) minutes from start-up until it merges with the street traffic flow , applying EPA's indirect source analysis procedures, this "worst case" design would yield maximum carbon monoxide emissions on the order of 7-8 parts per million (ppm) per hour. A multi-story parking structure with efficient vertical ventilation would create some 3-4 ppm per hour at the same criterion point. Thus, with reasonable design, the expected level of localized CO emissions attributable to the project during its peak hour activity is the range of 4 - 5 mg/m^3. The average localized level over the entire 2 pm - closing period is estimated to be 3 - 4 mg/m^3. If it is assumed that the average of the background levels at the two monitoring stations closest to the project site reflect a reasonable approximation of the localized background emssion level, the maximum 1 - hour background level would be in the range of 6 - 7 mg/m^3 (see Table 5-O) and the maximum 8 - hour background level would be about 4 mg/m^3 (see Table 5-P).

Imposing the estimated localized CO emissions upon these background levels results in a projected maximum 1 - hour concentration of 10 - 12 mg/m^3; a level well below the EPA standard of 40 mg/m^3. The projected maximum 8 - hour concentration resulting from the addition of localized emissions to background levels is estimated at 7 - 8 mg/m^3; a level which is also below the EPA's 8 - hour standard of 10 mg/m^3. Thus, the proposed project would not yield concentration levels in excess of EPA standards either locally or in the downtown area.

Mitigating measures with respect to emissions at or near parking facilities would include: location and design of exits to minimize queueing problems and facilitate rapid dispersion of departing traffic; implementation of a fare collection/ parking validation system which minimizes exit delays; and design of ventilation systems to prevent build-up of pollutants inside the structure or at the exterior street level and which vent exhaust fumes in the most efficient manner.

Given the relatively short duration of peak traffic periods, the dispersal capacity of the street network (especially during evening hours), the relatively low baseline pedestrian and vehicular traffic volumes at these hours, and the absence of street-level residential land use in the immediate vicinity, the overall impacts are expected to be minimal.

TABLE 5-O

SUMMARY OF AMBIENT AIR QUALITY
FOR EACH ALTERNATIVE(1-HOUR CO CONCENTRATION)

Receptor Location	ALT: / YEAR:	Maximum 1-Hour CO Concentration (mg/m3) Existing 1975	No-Build 1985	Proposed Action 1985
1. AIRMON 1		24	6.2	6.4
2. 200 Read Street		27	6.9	7.1

Note: 1-hour primary/secondary standard for carbon monoxide in 40 mg/m3

Source: Walden Division of Abcor, Inc.

TABLE 5-P

SUMMARY OF AMBIENT AIR QUALITY
FOR EACH ALTERNATIVE (8-HOUR CO CONCENTRATION)

Receptor Location	ALT: / YEAR:	Maximum 8-Hour CO Concentration (mg/m3) Existing 1975	No-Build 1985	Proposed Action 1985
1. AIRMON 1		12.0	3.2	3.4
2. 200 Read Street		18.0	4.8	5.0

Note: 8-hour primary/secondary standard for carbon monoxide is 10 mg/m3

Source: Walden Division of Abcor Inc.

Construction Air/Quality Impacts

The air quality impacts associated with the construction of the proposed development are anticipated to consist principally of fugitive dust emissions associated with demolition activities and exhaust from construction vehicles. Air pollution control regulations in effect for the State of Maryland require fugitive emission controls by the following methods:

- Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the guarding of roads or the clearing of land;

- Application of asphalt, oil, water or suitable chemicals on dirt roads, materials stockpiles and other surfaces which can create airborne dusts;

- Installation and use of hoods, fans and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations;

- Covering, at all times all open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same result as would covering the materials;

- Paving of roadways and their maintenance in clean condition;

- Prompt removal from paved streets of earth or other material which has been transported thereto by trucks, by earth moving equipment or by erosion.

Effect of Development on Attainment and Maintenance of Ambient Air Quality Standards

As noted in earlier sections, the combined intent of Federal new car emission standards and the proposed Transportation Control Plan for the Baltimore region is to reduce ambient concentrations below the Federal Air Quality Standards, and to maintain these levels once achieved. Predictions of 1985 CO concentrations for various alternatives indicate that, although 8-hour CO standards were exceeded during 1975 and 1976, no excesses will occur in 1985.

The 1-hour CO standard was not exceeded in 1975 or 1976, as evidenced by the most recent monitoring data. Because of the projected reduction in emissions, the standard is not expected to be exceeded in 1985 in the city. The primary/secondary standard for NOx (annual arithmetic mean of 100 ug/m3) was not exceeded in 1975 or 1976 and is not expected to be exceeded in 1985.

Because of the complexity of atmospheric photochemical processes involving hydrocarbons, nitrogen oxides and oxidants, and the current limitations in prediction technology, no quantitative assessment was made of attainment or maintenance of the standards of these pollutants. However, due to the projected decrease in hydrocarbon emissions for the year 1985, a corresponding reduction in the ambient oxidant concentrations is expected to maintain the current air quality.

Air Quality Impact of Induced Development

The air quality impact of long-term secondary development in MetroCenter induced by Baltimore Gardens cannot be forecast with any accuracy as it will be dependent upon the precise nature of such development and unresolved issues such as possible rapid transit extensions and downtown-people-mover systems. However, given the projections of continuing declines in Citywide air pollution levels between 1985 and 1995 (the time at which the full impact of induced development might be anticipated) adverse impacts should not be significant.

Specifically, projections[26] indicate that between 1985 and 1995 daily average Citywide emissions of CO, HC and Nox will decrease by 31%, 35% and 11%, respectively, From these values it can be seen that even a major induced redevelopment of the City's retail/commercial core, relying heavily on vehicular access, would not begin to reverse the continued improvement in air quality.

Energy

The precise energy requirements of the proposed project can only be determined when the final plans and specifications for the new development have been prepared. In the absence of such data it is possible to develop generalized measures of energy consumption based on prototypical averages for individual elements. The estimated energy requirements for individual components of the proposed action in B.T.U.'s (British Thermal Units) are as follows:

Element	Area (Sq. Ft.)	Annual B.T.U.'s per sq. ft.	Annual Consumption in B.T.U.'s
Enclosed Public Plaza	20,000-30,000	190,000-205,000*	3.8 - 6.2 billion
Specialty Retail	131,000	104,000	13.6 - billion
Department Stores	200,000	114,000	22.8 - billion
Restaurant/ Entertainment	60,000	131,000	7.9 - billion
Residential	200,000	55,000	11.0 - billion
Parking	500,000	6,000	3.0 - billion
		Total	62.1 - 64.5billion

*Assumes overage ceiling height of 40 ft.; range depends on opaque vs. transparent roof.

26 By Walden Division of Arcor, Inc.

These estimates are based on the following assumptions regarding operating hours: public plaza - 18 hours/day, 7 days/week; retail department store and restaurants - 12 hours/day, 6 days/week; parking facility and residential - continuous operation. The project's energy requirements can be examined in terms of both its absolute consumption rate (shown above) and its relative energy demands compared to the pre-1976 demands of the site (i.e. when the Hochschild-Kohn store was in full operation).

While it has not been possible to obtain historical data for on-site energy requirements pre-1976, this value can be estimated:

Total pre-1976 floor space:	477,000 sq. ft.
Less allowance for unused space:	-75,000 sq. ft.
Total space consuming energy:	402,000 sq. ft.
Pre-1976 B.T.U.'s per sq. ft.	x157,000*
	63.114 billion B.T.U.'s
Allowance for shorter operating hours:	x .67
Estimated Annual On-Site Energy Consumption, re-1976:	42.29 billion B.T.U.'s

*Based on estimated possible energy savings in new vs. old pre-1940 construction of 30-35% if energy efficient standards of the Engineers (ASHRAC) are followed. SOURCE: "Energy Conservation in New Building Design: An Impact Assessment of ASHRAC standards 90-75", by Arthur D. Little, Inc., Cambridge, Mass., for the Federal Energy Administration, 1976.

be in the range of 62-65 billion B.T.U.'s per year, a value which represents an increase of 20-23 billion B.T.U.'s (50%) in the energy demands of the site in the pre-1976 period. This level of energy demand can be translated into various source equivalents in the following manner:

Energy Source	Measure	Relation to B.T.U.*	Annual Project Requirements Total	Annual Project Increment vs. Pre-1975
Electricity	kwhr	3,413 B.T.U.'s = 1 kwhr	18.6 million kwhr	6.2 million kwhr
Coal	Ton	23 million B.T.U.'s = 1 ton	2,760 tons	920 tons
Oil	Barrel	5.8 million B.T.U.'s= 1 barrel	10,948 barrels	3,610 barrels
Heating Oil(#2)	Gallon	14,000 B.T.U.'s = 1 gallon	453,600 gallons	151,200 gallons

*SOURCE: "Development of Community Energy Conservation Program", Urban Systems Research and Engineering, Inc. for the Federal Energy Administration, November, 1976.

In addition, approximately 39,000 additional vehicle miles of travel per day in the region, attributable to the project, would result in the consumption of an additional 650,000 gallons of gasoline per year (based on 1982 average 19 miles/gallon in city driving).

The project developer and representatives of the City and utility firm(s) must make a decision as to the energy source(s) to be employed. The final choice of a single source or combination of sources will be based on a variety of factors including: availability, installation, and equipment costs, annual operating costs, reliability of continuing supplies, incentives for energy conservation, and cannot be predicted at this time. The availability of an extensive network of steam lines along the perimeter of the project site provides additional opportunities for energy conservation which will be explored to the fullest during final design.

While energy is becoming an increasingly scarce and expensive commodity, there do not appear to be any problems or adverse impacts in terms of adequacy of supply or the residual capacity of existing supply and distribution systems in the project area. This holds true even in the event that all energy requirements are obtained from a single source; the total project demand would still be substantially less than 1% of MetroCenter demand.

6.0 HISTORICAL AND CULTURAL RESOURCES: SECTION 106 and SECTION 4(f) ANALYSIS

6.1 Legal and Administrative Requirements

Section 106 of the National Historic Preservation Act of 1966, as amended, directs Federal agencies to take into account the effect of their undertakings on any district, site, building, structure, or object (hereinafter "properties" or "resources") which is included in the National Register of Historic Places. The 1970 amendments to the Act extend this consideration to properties which are eligible for the National Register of Historic Places. Federal agencies must obtain the review and comment of the Advisory Council on Historic Preservation prior to the approval of undertakings which affect such properties. The Advisory Council, an independent agency created to advise the President and Congress on matters involving historic preservation, has established procedures for protecting historic and cultural properties included in or eligible for inclusion in the National Register of Historic Places

Section 4(f) of the Department of Transportation Act of 1966 establishes a national policy that special effort be made to preserve the natural beauty of the countryside, public parks, recreational lands, wildlife refuges, and historic sites. The intent of Section 4(f) is to avoid the use of these lands. Any program or project which requires the use of land from a public park, recreation area, or wildlife refuge of National, State or local significance, as determined by the official having jurisdiction thereof, or any land from an historic site of National, State or local significance will not be approved unless a determination can be made that: (1) there is no feasible and prudent alternative to the use of such land, and (2) the program or project includes all possible planning to minimize harm to the 4(f) land.

The Draft and Final Environmental Impact Statements for the Lexington Market Station Joint Development Project contain the Section 106 and Section 4(f) analyses. With respect to Section 106, the Draft EIS served as a preliminary case report, describing the project's effect on historical properties and evaluating alternatives that would avoid or mitigate adverse effects. This Final EIS contains a Memorandum of Agreement approved by UMTA, the Advisory Council on Historic Preservation, and the Maryland State Historic Preservation Officer, which stipulates measures that will be taken to mitigate adverse effects on certain historic properties. This Final EIS also contains the determinations required by Section 4(f) of the Department of Transportation Act.

6.2 Identification of Historic and Cultural Resources

A survey of the area of the project's potential environmental impact, entitled: Inventory of Potential Historical, Architectural, and Cultural

Resources for the Baltimore Gardens: Lexington Market Station Joint Development Project, dated February 1978, was prepared as an adjunct to the draft environmental impact statement and has been broadly distributed to interested historic preservation groups, individuals, and agencies.

A significant basis for the Inventory was provided by The CBD West: An Historic and Architectural Perspective, a staff survey prepared for the Baltimore City Commission for Historic and Architectural Preservation in March 1976. The CBD West report was based on the Baltimore City Neighborhood Preservation Survey conducted by the Baltimore City Planning Department and the staff of the Commission for Historic and Architectural Preservation in 1975. The CBD West report is also available for inspection. It includes a review of the historical development of the larger CBD West area, early photographs and lithographs of major buildings and sites, a selective inventory of existing buildings and streetscapes, and general recommendations for the course of future development.

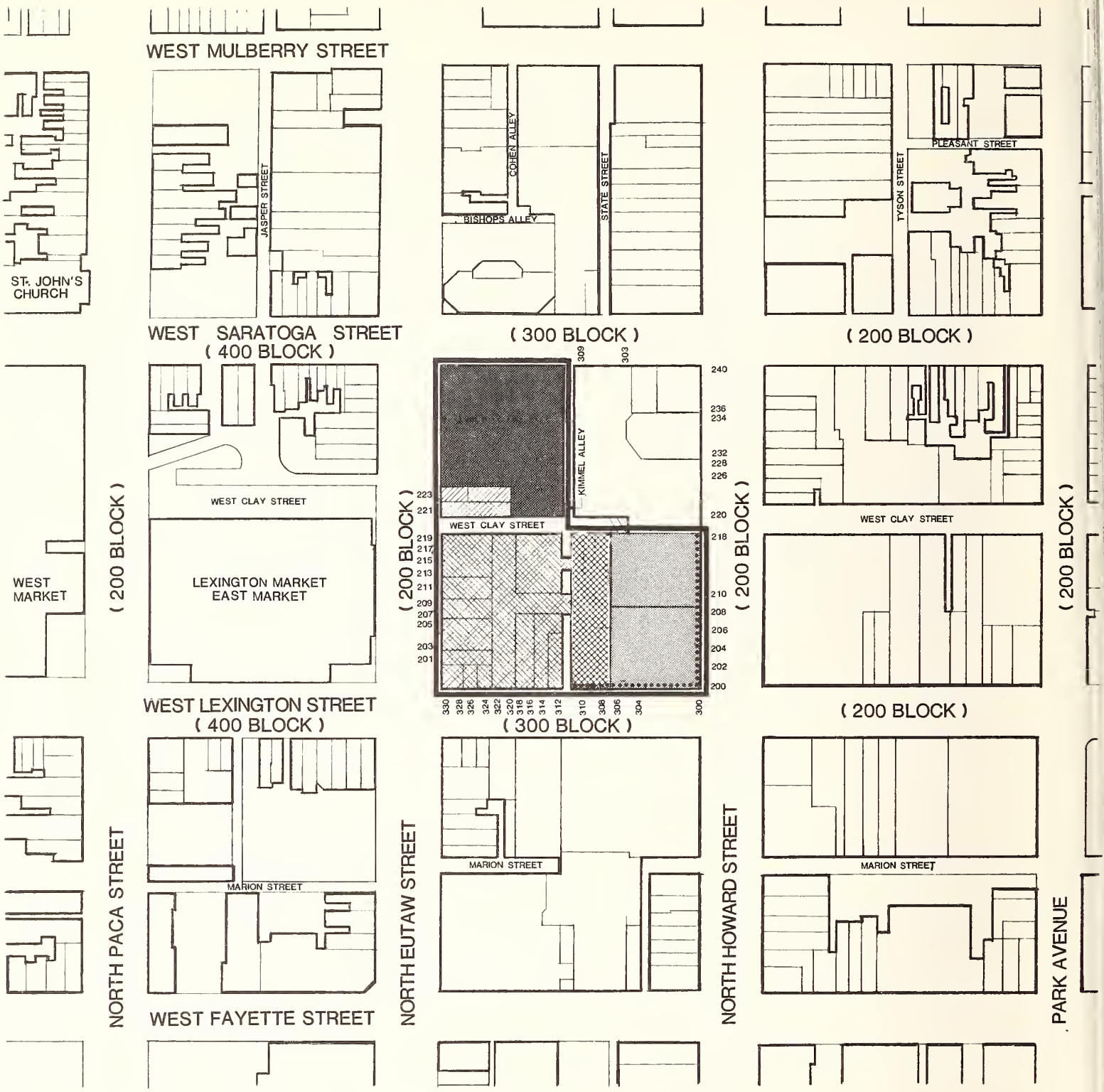
The Inventory of Potential Historical, Architectural, and Cultural Resources has also drawn upon the advice of the staff of the Commission for Historic and Architecural Preservation, the State Historic Preservation Officer and the Baltimore City Committee of the Maryland Historical Trust, specialized architectural and historic research performed by an expert consultant selected upon the recommendation of the Maryland Historical Trust, specialized architectural and historic research performed by an expert consultant selected upon the recommendation of the Maryland Historical Trust, interviews with persons familiar with the development of the project site and surrounding area, department store archival materials, and published nineteenth century historical accounts of the growth and development of Baltimore.

Mr. Russell Wright served as the Historic Preservation Consultant in the preparation of the historic preservation survey. Arthur Cotton Moore and Associates serviced as the Architectural and Planning Consultant.

Two area definitions have been used in the identification of properties of architectural, historical, and cultural significance. The Core Study Area is the overall survey area employed in the Inventory of Potential Architectural, Historical, and Cultural Resources. It corresponds to the primary definition of "the entire area of potential environmental impact" used throughout this EIS. It is bounded by Franklin Street, Greene Street, Baltimore Street and on the east, Cathedral and Liberty Streets. The Core Study Area, illustrated in Figure 2-1, includes 24 city blocks and approximately 590 buildings. The area definition which is relevant for assessing the proposed project's impact on historic and cultural resources is the Project Site Area and Environs, which contains the project site area and its adjacent block faces (See Figure 6-1).

The survey ratings given to each building and site within the Core Study Area were reviewed with the staff of the Baltimore City Commission for Historic and Architectural Preservation, and with the State Historic Preservation Officer and staff and Baltimore City Committee of the Maryland Historical Trust. The area definitions were also reviewed with these groups.

The Draft Environmental Impact Statement identifies one structure adjacent to the project site which is listed in the National Register of Historic Places (the Howard Street Tunnel of the B&O Railroad) and six buildings on or adjacent to the project site which were potentially eligible for the National Register. Documentation on the six buildings was submitted to the Department of the Interior on August 22, 1978 for a determination of eligibility. On October 13, 1978, the six buildings were determined to be eligible for the National Register. The Department of the Interior also requested that documentation be submitted to determine whether or not the six buildings lie within a potentially eligible historic district. On March 15, 1979, the Department of the Interior determined that a nine square block area, bounded by Paca Street on the west, Fayette Street on the south, Park Avenue on the east, and Mulberry Street on the north, is part of a retail area historic district eligible for inclusion in the National Register of Historic Places. Study of a larger area will be undertaken at a later date to determine the exact boundaries of the Retail Historic District.



IMPACT OF THE PROPOSED ACTION WITHIN THE HISTORIC DISTRICT

- BUILDINGS TO BE DEMOLISHED
- BUILDINGS TO BE RELOCATED
- BUILDINGS WHICH MAY BE RETAINED (THE REMOVAL OF THE PRESENT FLOORS AND THE RESTRUCTURING OF THE BUILDINGS WITHIN THE NORTH HOWARD AND WEST LEXINGTON STREET FACADES WOULD BE A PERMITTED OPTION TO THE SELECTED DEVELOPER.)
- TEMPORARY CONTRACTOR'S WORK AND STORAGE AREA
- ..... FACADES TO BE RETAINED

BALTIMORE RETAIL HISTORIC DISTRICT

CITY OF BALTIMORE: THE LEXINGTON MARKET STATION JOINT DEVELOPMENT PROJECT

FIGURE 6-1

Figure 6-2. The west side of the 200 block of North Howard Street

Figure 6-3. The North side of the 300 block of West Lexington Street

Figure 6-4. The east side of the 200 block of North Eutaw Street

Figure 6-5. The south side of the 300 block of West Saratoga Street

6.3 Impact of the Proposed Action on the Historic District

The Lexington Market Station Joint Development Project would be constructed within City Block 596, which is bounded by Eutaw Street on the west, Lexington Street on the south, Howard Street on the east, and Saratoga Street on the north, and is adjacent to and would be directly connected to the Lexington Market Rapid Transit Station, which is now under construction. The project block lies within the nine square block area which has been determined to be eligible for the National Register. It is divided into quadrants of approximately equal size by Kimmel Alley and Clay Street. Within the northwest quadrant of City Block 596, all of the buildings were acquired and demolished by the Maryland Department of Transportation's Mass Transit Administration with the exception of the buildings located at 221 North Eutaw Street and 223 North Eutaw Street (Arthur's Bakery). The joint development project would result in the demolition of the building at 221 North Eutaw Street and the relocation of the historically significant front section of Arthur's Bakery to an appropriate relocation site within the immediate vicinity. Implementation of the joint development project would result in clearing the southwest quadrant of Block 596. Within the southeast quadrant, the developer to be selected by the City of Baltimore will evaluate the feasibility of adopting a preservation treatment for the interior of the Hutzler's Palace Building (210-218 North Howard Street) and will be encouraged to employ a treatment that retains the interior of the Hochschild-Kohn main building complex (200-208 North Howard Street/300-306 West Lexington Street). If a preservation treatment is not feasibile and prudent, the interiors of these buildings may be restructured. The building facades at 200-218 North Howard Street and 300-310 West Lexington Street will be retained. The northeast quadrant of City Block 596 would not be physically affected by the joint development project. The Draft EIS stated that there would be no adverse effect on the Howard Street Tunnel of the B&O Railroad. Further discussions with the Maryland State Historic Preservation Officer have resulted in a finding that the proposed action would have no effect on the Howard Street Tunnel.

6.4 Alternatives to the Proposed Action

The proposed Lexington Market Station Joint Development Project would encompass property acquisition, business relocation, demolition, site preparations, and public improvements in preparation for the development of a privately-sponsored, multi-level shopping, commercial and entertainment complex to be located between the Lexington Market Rapid Transit Station and the northwest corner of Howard and Lexington Streets at the heart of the downtown retail district. The proposed action would have an adverse effect on a portion of an historic district, which is eligible for inclusion in the National Register of Historic Places.

Alternatives Which Avoid Adverse Effects

Under the No-Action alternative, it is projected that the proposed project site area and the larger surrounding retail district will continue to decline, both in terms of rapidly declining retail sales volumes, loss of jobs, continuing erosion of the tax base, loss of major stores, and a general deterioration of the public and private environment. In addition, the ridership potential of the Lexington Market Rapid Transit Station will not be fully realized, thereby jeopardizing the Federal and State investment made in the Section A rapid transit line. The expected consequences of the No-Action alternative are described more fully in Chapter 3, Section 3.5.

The physical relocation of the proposed joint development project to another block within the retail district would not avoid adversely affecting properties of comparable historic and cultural significance. Both the CBD West report and the Inventory of Potential Historical, Architectural, and Cultural Resources document the number of properties of potential national, state, and local significance located throughout the retail district of downtown Baltimore. Furthermore, it would not be prudent to relocate the proposed project, in light of the two principal reasons for locating it at its present site:

1. The proposed project site area is located immediately adjacent to the approved construction site for the Lexington Market rapid transit station. It directly abuts the location of the east wall of the station structure. Since 1968, final design planning for the transit facility has incorporated an upper mezzanine level within the station structure, supported from its east wall, and has provided a continuous arcade of knock-out panel openings within this wall. The vertical location of mezzanine level and knock-out panel opening thresholds is 26-28 feet below the existing grade of the Eutaw Street sidewalk. This elevation is approximately the same as the existing elevation of the Howard and Lexington Street intersection at the southeast corner of the project site. The Lexington Market station will be constructed by cut-and-cover construction methods involving total excavation of the bed of Eutaw Street adjacent to the proposed project site. The joint development project must be located at this site in order to achieve the goal of public and private development integrally related to the design, construction, and operation of the transit station.

2. The proposed project site area is strategically located between the traditional "100% corner" of the downtown retail

district, the Lexington Market facilities (East and West market buildings, and Lexington Market parking garage) west of Eutaw Street, major existing downtown department stores along the north, east, and south edges of the site, the existing and future segments of the Lexington Street pedestrian mall, and the site of the Lexington Market rapid transit station. Within the larger context of Downtown Baltimore, the proposed project site area is also strategically located between the Charles Center and Financial District office complex to the east, and the new Social Security Administration downtown office center, now under construction, and growing University of Maryland professional schools campus to the west. To the south of the Project site lies the City's Loft Building and Warehouse District, where handsome loft buildings constructed during the last quarter of the nineteenth century are being recycled for residential use, and Baltimore's Inner Harbor Area, which is being successfully redeveloped for a variety of residential and mixed commercial uses. Comprehensive economic development and urban design planning conducted over the past decade has indicated that the redevelopment of the proposed project site area is necessary in order to serve as a catalyst for the overall revitalization of the City's older shopping district and to fulfill the goals of Baltimore's larger downtown development program.

Alternatives Which Mitigate the Adverse Effects

Inasmuch as a number of buildings of potential historic and architectural significance were identified within the project site area and its immediate environs, a range of specific development alternatives have been prepared with historic preservation as a major objective. Summarized here, these alternatives are described in greater detail in Chapter 3.

Scheme A - Illustrates the maximum retention of existing structures within the project site area (with the exception of structures previously demolished independently by the Maryland Mass Transit Administration pursuant to the approved environmental impact statement for the Phase I/ Section A Baltimore Region Rapid Transit project; and with the exception of the existing structures at 320-323 West Clay Street, and the rear portions of 316-318 West Lexington Street, which would be demolished in order to provide a central pedestrian and shopping concourse and circulation plaza for tying together the remaining existing structures). Scheme A has not been selected as a preferred alternative because:

(a) the extraordinary cost, engineering and construction complexity, and time requirements to reconstruct the building support systems of 324-330 West Lexington Street and 201-219 North Eutaw Street, and retain these existing eight buildings in place above the proposed southeast public entrance plaza, was not prudent in view of the findings with respect to the architectural, historic, or cultural values of these buildings;

(b) the retention of these buildings above the transit entrance was infeasible, as the underpinning columns required to support the buildings would have directly blocked the knock-out panel openings in the wall of the station structure;

(c) the fullest possible provision of internal connecting ramps and walkways, and new mechanical vertical circulation facilities within these existing structures, and between them and the new pedestrian and circulation concourse illustrated for development at the center of the project site, could not feasibly overcome the fundamental problem of cut-up and physically and vertically divergent floor areas within the upper levels of these existing structures west of Kimmel Alley. Given the infeasibility of adequately reconstructing existing upper floors for active retail or office use, the economic consequences of Scheme A were identical to those of the No-Action alternative.

During the course of the consultation process with the Advisory Council on Historic Preservation and the Maryland State Historic Preservation Officer, the feasibility of retaining the four buildings located at 312, 314, 316-318 and 320-322 West Lexington Street was investigated. The feasibility of retaining the facades of these buildings was also investigated.

The retention of these buildings or their facades would entail: an extensive engineering investigation of the structural condition of the

buildings; the design of an underpinning system for the buildings; the installation of columns, needles, and post tension beams; removal of the existing first floors; excavation beneath the buildings to allow for the eastward extension of the pedestrain plaza connecting the mezzanine level of the subway station with the portion of the joint development site east of Kimmel Alley; reconstruction of the first floors of the buildings; and installation of new vertical circulation elements to make the upper floors fully accessible to the elderly and handicapped. Retention of these buildings or facades would also necessitate a redesign by the MTA of the Southeast Entrance Plaza to the Lexington Market Station, a redesign which could not commence until the City had completed its structural analysis of the existing buildings. The redesign of the entrance plaza would delay construction of the plaza by a minimum of 13 months. The underpinning, excavation, reconstruction sequence required to retain the four buildings would cost more than $2.4 million (see Exhibit A); retention of the four facades and approximately 30 feet of the buildings to assure their stability would cost more than $1.3 million (see Exhibit B). These costs would have to be borne entirely by the public sector (UMTA, City of Baltimore) as a priviate developer would regard them as infrastructure costs, above and beyond the normal development costs he would be willing to assume.

If either the buildings or building facades at 312 to 322 West Lexington Street were to be retained, it would take an engineering consultant, whom the City would have to select, six months to analyze the buildings and design an underpinning support system. The MTA could then undertake its redesign which would take a minimum of five months.

Securing UMTA approval of the redesign and negotiating a change order to the Station contractor would take an additional three months. At such time, construction of the entrance plaza could begin; the delay occasioned by the redesign would be at least 13 months if facades were to be retained and at least 15 months if the buildings were retained.

In addition to the increased expense and the delays which the retention of these buildings or facades would occasion, the redesigned Southeast Entrance Plaza would be in serious conflict with the design objectives of both the MTA and the joint development project. The eastward extension of the pedestrian plaza would not only require expensive excavation beneath the buildings to be preserved, but the underpinning system would result in large columns and massive post tension beams to support the buildings. For both aesthetic and security reasons, the plaza has been envisioned as a column free space, which would not be possible with retention of the buildings or facades.

EXHIBIT A

BUILDING PRESERVATION
312-322 West Lexington Street

ITEM		COST
Construct Underpinning Piers		$1,100,000
Construct Underpinning Spandrel Beams		300,000
Design Underpinning - City		120,000
Entrance Redesign - MTA		170,000
Contractor Delay Costs		710,000
	TOTAL	$2,400,000

EXHIBIT B

FACADE PRESERVATION
312-322 West Lexington Street

ITEM		COST
Construct Underpinning Piers		$ 408,000
Construct Underpinning Spandrel Beams		78,000
Design Underpinning - City		51,000
Entrance Redesign - MTA		100,000
Contractor Delay Costs		572,000
Increased Demolition Costs		45,600
Weatherproofing North Wall		15,600
Facade Bracing		51,600
	TOTAL	$1,300,000

In summary, the retention of the buildings or facades at 312 to 322 West Lexington Street is not feasible or prudent due to : (1) the cost and major redesign which their retention would entail; (2) the delays to the schedule for constructing the Southeast Entrance Plaza and for completing the Lexington Market Station; (3) the economic infeasibility of creating fully accessible and leasable space above the first floor level; (4) the negative aesthetic character of the resulting transit station entrance plaza.

Scheme B - Illustrates new construction and development within the portion of the project site area bounded by Eutaw Street, Saratoga Street, Kimmel Alley, and Lexington Street (with provision for the physical relocation of the original front portion of Arthur's Bakery, at 223 North Eutaw Street, to one of two recommended appropriate relocation sites identified in the 400 block of West Saratoga Street; and provision for the possible retention of the Lexington Street facades of 316-318 and 320-322 West Lexington Street). This alternative also provides for the retention of all or substantial portions of the structures at 300-306 West Lexington Street/200-208 North Howard Street (the former Hochschild-Kohn and Company Department Store "Main" building complex) and 210-218 North Howard Street (the Hutzler's Department Store South or "Palace" building). Scheme B has not been selected as a preferred alternative because:

(a) retention of the Lexington Street facades of 316-318 and 320-322 West Lexington Street was analyzed and has been found to be both imprudent and infeasible as noted under the Scheme A discussion.

(b) retention of the existing structures included within the former Hochschild-Kohn main building complex cannot be assured due to the functional obsolescence of this complex for contemporary retailing use. However, the developer selected for the project will be encouraged to employ a treatment that retains the interior of the Hochschild-Kohn complex.

(c) retention of the interior of the Hutzler's Palace Building is dependent upon a feasibility study to be undertaken by the developer whom the City selects for the project.

A sub-alternative under Scheme B, identified as Scheme B-1, would retain all or substantial portions of the existing building at

210-218 North Howard Street, the Hutzler's Department Store South or "Palace" building, for incorporation in the final development plan for the project site area (with provision for the retention of the Lexington and Howard Street facades of the former Hochschild-Kohn "Main" building complex, 300-306 West Lexington and 200-208 North Howard Streets; with possible retention of the facades of 316-318 and 320-322 West Lexington Street; and with the physical relocation of the original portions of Arthur's Bakery at 223 North Eutaw Street to an appropriate relocation site). Scheme B-1 has been identified as a valid sub-alternative, but only contingent upon final design and development feasibility studies to be conducted jointly by the City and the future developer to be selected by the City, because:

(a) the Historic Preservation Consultant identified the 210-218 North Howard Street building as possessing the highest degree of architectural and historic significance among all the existing buildings located within the project site area;

(b) the building at 210-218 North Howard Street has some potential for serving as a connecting retailing link between Hutzler's Department Store complex north of Clay Street and the new retail facilities to be developed within the project site;

(c) in view of the need to ensure the final development feasibility of the private development components of the proposed project, no final determination can be made at this time as to the retention of the interior of this structure, or its final incorporation in the final development plans for the project site.

The Draft Environmental Impact Statement refers to both Scheme C, "medium density new development", and Scheme D, "higher intensity new development", as preferred alternatives for the joint development project.

Scheme C illustrates new construction and development throughout the project site area, proposes demolition of all structures west of Kimmel Alley (with the exception of the possible retention of the facades of 316-318 and 320-322 West Lexington Street and the relocation of the front section of 223 North Eutaw Street, (Arthur's Bakery) and also proposes the demolition of the former Hochschild-Kohn main building complex at 200-208 North Howard Street and the Hutzler's Palace building at 210-218 North Howard Street (with provision for the possible retention of these buildings' facades).

Scheme D, the other preferred alternative described in the Draft EIS, also proposes new construction and development throughout the project site area. As in Schemes B and C, the original front section of Arthur's Bakery would be moved to an appropriate relocation site within the immediate vicinity. Scheme D, like Scheme C, proposes demolition of all other existing buildings within the project site area but, unlike Scheme C, does not make provision for any on-site facade retention along Howard and Lexington Streets.

The proposed action, described in detail in Chapter 4, combines elements of the two preferred alternatives, Schemes C and D. The historical front section of Arthur's Bakery would be moved to an appropriate relocation site. The facades of 200-218 North Howard Street and 300-310 West Lexington Street would be retained. The proposed action also provides for possible reuse of the interior spaces of the Hutzler's Palace Building and the Hochschild-Kohn main building complex.

6.5 MEMORANDUM OF AGREEMENT

In consultations involving the City of Baltimore, the Maryland State Historic Preservation Officer, the Urban Mass Transportation Administration, and the Advisory Council on Historic Preservation, the following Memorandum of Agreement has been reached by the aforementioned parties.

Advisory Council On Historic Preservation

1522 K Street NW.
Washington D.C.
20005

MEMORANDUM OF AGREEMENT

WHEREAS, the Urban Mass Transportation Administration (UMTA), Department of Transportation, proposes to assist the City of Baltimore (City) in the implementation of the Lexington Market Joint Development Project on City Block 596, Baltimore, Maryland; and,

WHEREAS, UMTA, in consultation with the Maryland State Historic Preservation Officer (SHPO), has determined that this undertaking will cause the relocation of the Lexington Market Subway Station entrance and will have an adverse effect upon the Retail Historic District, Baltimore, Maryland, a property eligible for the National Register of Historic Places; and,

WHEREAS, pursuant to Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f, as amended, 90 Stat. 1320) and Section 800.4(d) of the regulations of the Advisory Council on Historic Preservation (Council), "Protection of Historic and Cultural Properties" (36 CFR Part 800), UMTA has requested the comments of the Council; and,

WHEREAS, it is agreed that because of the established schedule for the subway project and the advanced stage of the plan for this project, retention of the Murphy Building at 320-322 West Lexington Street would cause undue delay and added cost; and,

WHEREAS, pursuant to Section 800.6 of the Council's regulations, representatives of the Council, UMTA, the Maryland SHPO, and the City have consulted and reviewed the undertaking to consider alternatives to avoid or mitigate the adverse effects;

NOW, THEREFORE, it is mutually agreed that the undertaking will proceed in accordance with the following stipulations to mitigate the undertaking's adverse effects.

Stipulations

UMTA will insure that the following measures are carried out.

1. Northwest Quadrant (area bounded by W. Clay Street, N. Eutaw Street, W. Saratoga Street, and Kimmel Alley) and

   Southwest Quadrant (area bounded by W. Clay Street, W. Lexington Street, N. Eutaw Street, and Kimmel Alley).

   a. Prior to the demolition of Numbers 201-221 N. Eutaw Street and Numbers 312-330 W. Lexington Street, the City will record these buildings in accordance with the standards of the Historic American Buildings Survey (HABS) so that there will be a permanent record of their existence. To accomplish this, the City will first contact HABS (Heritage Conservation and Recreation Service, Department of the Interior, Washington, D.C. 20243, 202-343-6217) to determine the level of documentation required. All documentation must be accepted by HABS prior to demolition.

   b. The open space that results from this demolition will be landscaped as soon as possible after it is vacated by the Maryland Mass Transit Administration contractor until permanent site development occurs. The landscaping plans will be submitted to the Maryland SHPO for review and comment.

2. Arthur's Bakery (Number 223 N. Eutaw Street).

   a. Prior to the demolition of the two rear additions of the building, the City will record the building in accordance with the procedure set forth in Stipulation 1(a).

b. The City will then relocate Arthur's Bakery to a new site in the immediate vicinity of the Lexington Market for transfer to an owner. Prior to the move, the new site will be approved by the Maryland SHPO and UMTA. The Maryland SHPO will evaluate the new site for any archeological resources and, if appropriate, a data recovery program will be undertaken in accordance with the Council's "Guidelines for Making 'Adverse Effect' and 'No Adverse Effect' Determinations in Accordance with 36 CFR Part 800" (Guidelines) (Attachment 1).

c. The City will rehabilitate Arthur's Bakery in accordance with the Secretary of the Interior's "Standards for Rehabilitation" (Standards) (Attachment 2). These Standards will be applied in consultation with the Maryland SHPO. Final plans and specifications for the work will be submitted to the Maryland SHPO for review and concurrence.

d. In the event that the City cannot reach a satisfactory agreement with the present owners of Arthur's Bakery for transfer of the property, the City will prepare a marketing brochure for the disposal of Arthur's Bakery that will include the following:

(1) Photographs,

(2) Information on Section 2124 of the Tax Reform Act of 1976 and its amendments,

(3) Information on public and private funding sources for preservation, and

(4) A description of the preservation covenants of Attachment 3.

e. Should the preparation of a marketing brochure be required, the City will advertise the availability of Arthur's Bakery until an owner is found. The Maryland SHPO will assist the City in publicizing the offer by contributing to the advertising list.

f. In the event that Arthur's Bakery is transferred by the City to a new owner, the City will transfer it in accordance with the preservation covenants of Attachment 3.

g. Within 120 days of relocation, the Maryland SHPO will, if appropriate, nominate Arthur's Bakery to the National Register.

3. Southeast Quadrant (area bounded by Kimmel Alley, W. Lexington Street, Clay Street, and N. Howard Street).

The City will ensure that the facades of the Palace Building, the Hochschild-Kohn Main Building, and Numbers 308-310 W. Lexington Street are cleaned, repointed, and repaired, as appropriate, in accordance with the Standards (Attachment 2). These Standards will be applied in consultation with the Maryland SHPO who will review and concur in the plans for the work.

4. Interior of the Palace Building.

a. An investigation of the interior of this building to determine the condition of original building fabric will be undertaken, in consultation with the Maryland SHPO.

b. The City will ensure that the selected developer will give thorough consideration to the retention of the interior of this building as part of the total development scheme. The City and the developer will investigate and document the feasibility of restoration, preservation, and rehabilitation as defined by the "Secretary of the Interior's Standards for Historic Preservation Projects" (36 CFR Part 1207). A treatment that best satisfies historic preservation concerns and is economically feasible will be selected. The documentation requirements of a historic structures report, as defined in the Grants Manual of the Secretary of the Interior, will be used in making the analysis of the building (Attachment 4).

Documentation of the feasibility of each of the three alternative treatments for the building will be submitted by the City to the Maryland SHPO for review. The Maryland SHPO will respond within 10 working days after receipt. If the Maryland SHPO concurs in the adequacy of the documentation, the work on the interior space will proceed only after there is HABS documentation of these spaces, in accordance with Stipulation 1(a), and salvage. All possible items will be salvaged. Should the City of Baltimore Salvage Depot refuse any items, the City will contact the Maryland SHPO for alternative disposal.

5. Interior of Hochschild-Kohn Main Building.

The developer will be encouraged to retain the interior of the Hochschild-Kohn Main Building as part of the new development scheme.

6. In any formal negotiations that the City has with prospective developers for the project, the following materials will be made available.

a. Information on public and private funding sources for rehabilitation of the buildings on the project site,

b. Information on Section 2124 of the Tax Reform Act of 1976 and its amendments,

c. Information describing the preservation covenants of Attachment 5, and

d. Design guidelines for the new construction on the site that take into account the scale, massing, texture, color, and fenestration pattern. These guidelines will be submitted to the Maryland SHPO, who will review them and provide comments to the City within 10 working days. The City will respond to the comments of the Maryland SHPO prior to proceeding.

The Maryland SHPO will assist the City in publicizing the offer and contribute to the list of potentially interested parties.

7. The City will evaluate the proposal(s) received against the design guidelines of Stipulation 5(d). The Maryland SHPO will participate in such review and evaluation.

8. All property transferred to the selected developer will contain the preservation covenants of Attachment 5.

9. During the construction phase of the project, the City will ensure that an archeologist meeting the qualifications of 36 CFR Part 66, Appendix C, "Professional Qualifications" (Attachment 6), and having specific training in historical archeology, will monitor all activities, including demolition. Should significant resources, as defined in 36 CFR Part 66, Appendix B, "Guidelines for the Location and Identification of Historic Properties Containing Scientific, Prehistoric, Historic, and Archeological Data" (Attachment 6), be found, a data recovery plan will be undertaken in accordance with the requirements of the Council's Guidelines (Attachment 1). Provisions in the construction contract documents will include the requirement that construction be shifted to other areas while data recovery is undertaken.

11. The City, acting through its Commission for Historical and Architectural Preservation (CHAP) and in consultation with the Maryland SHPO, will undertake a study to determine if there is an historic district and/or individual properties within the area of Baltimore bounded by W. Franklin Street, Greene Street, W. Baltimore Street, and on the east Cathedral and Liberty Streets that may be eligible for the National Register of Historic Places and/or City of Baltimore Historic and Architectural Preservation designation. The study will be undertaken within 6 months and completed within 18 months of ratification of this Agreement.

Robert R. Little (date) 6/4/79
Deputy Executive Director
Advisory Council on Historic Preservation

(date) 6/26/79
Urban Mass Transportation Administration

(date) 6-6-79
Maryland State Historic Preservation Officer

(date)
Chairman
Advisory Council on Historic Preservation

Concur:

(date) 6/6/79
Physical Development Coordinator
City of Baltimore

6.6 Section 4(f) Determinations

Based on the documentation contained in this Final Environmental Impact Statement, it has been determined that no location or design alternatives to the proposed action are feasible or prudent. In consideration of the City of Baltimore's goals and objectives for the revitalization of its retail district, as expressed in the Retail District Urban Renewal Plan and Ordinance (City Council Ordinance 579, approved November 16, 1977) and taking into account the planning to protect historic properties adversely affected by the project and the commitments made to mitigate adverse effects on certain buildings contained in this document, it has been determined that all possible planning to minimize harm to the historic district has been undertaken. The measures agreed to by the Advisory Council on Historic Preservation, the Maryland State Historic Preservation Officer, and the Urban Mass Transportation Administration satisfy to the fullest extent practicable the concerns of the U. S. Department of the Interior that an alternative be selected "which is economically viable and which retains the greatest amount of the historical and architectural integrity of the properties involved." (Nov. 1, 1978, letter from Department of the Interior to Urban Mass Transportation Administration).

7.0 UNAVOIDABLE ADVERSE ENVIRONMENTAL EFFECTS

7.1 Long-Term Adverse Impacts

Transportation

The adverse long-term transportation impacts of the proposed action primarily relate to vehicular traffic and circulation in the immediate vicinity of the site. Traffic forecasts prepared by the Baltimore City Planning Department compare the "no-action" alternative with the proposed action.

On the major arteries and local streets in the study area, the net daily traffic increments associated with the upper limit of development intensity (the worst case in terms of traffic impact) would be about 5%. The total volume in 1982 would be no greater than the volume which existed as late as 1975 (when the downtown Hochschild-Kohn Department Store was still in operation) and is not viewed as being significant in terms of street or intersection capacities.

Water Resources

Under the proposed action, a possible new residential component would represent a small net increase in water resource demand (under 50,000 gallons per day). This new demand, however, would not peak at the same time as the demands of the predominant commercial users in the area, and would, therefore, not alter peak hour water resource demand requirements. Given that the structures to be replaced are equipped with sprinkler systems, the on-site water volume and pressure demands related to fire flows would not be increased significantly.

The proposed action does not require the paving over of any natural drainage runoff areas since the entire project area is already completely urbanized. No increase in run-off volumes or problems with storm sewer capacity are projectd as a result of the proposed action.

Air Quality

There would be no significant adverse impacts on air quality as a result of the proposed action. Predicted overall future concentration of Carbon Monoxide, Hydrocarbons, and Nitrogen Oxides in the impact area are expected to yield improved air quality as a result of per vehicle emission

reductions and the implementation or Regional Air Quality Maintenance and Control Plans. The very minor increase in regional VMT (some 0.5%) is not nearly sufficient to offset this improvement. Localized traffic increases during peak hours would also not be sufficient to yield significant deterioration in air quality. It is not projected that either the maximum one-hour or eight-hour standards will be exceeded.

Careful attention to design of the project's parking facilities will ensure adequate ventilation and air circulation to prevent inordinate accumulations or polluting emissions resulting from cold starts or exit queues. Parking access and egress will be planned, located, and sized so as to minimize the length of queues at peak periods and ensure efficient dispersion of this traffic without degradation of localized air quality.

Noise

There would be a slight increase in the overall ambient noise level as a result of the Lexington Market Station Joint Development Project. Additional automobile traffic generated by the project could raise the noise level in the immediate vicinity slightly (the greatest increase in the noise level, no more than 2-3 dB, would occur in the early evening hours). Such increases, however, are still below the threshold of perception in an urbanized environment and would not be significant.

Historical Resources and Features

The Lexington Market Station Joint Development Project would be constructed within an historic district determined to be eligible for the National Register of Historic Places. Project implementation would necessitate the demolition of fourteen structures because of their location within the project construction limits.

7.2 Short-Term Adverse Impacts

Transportation

Construction activity would create a number of adverse effects on vehicular and pedestrian traffic. Among them would be temporary roadway and sidewalk detours, constricted capacities, and access problems. As Baltimore Gardens construction would overlap with that of transit station construction itself, the net additional impacts attributable to the proposed project would be relatively minor.

Development Impacts

One possible adverse development impact which might occur is the potential increase in vacancies in older and less desirable store locations outside of the immediate environs of the project site. To the extent that the project attracts tenants from these existing buildings, it could parti ally diminish the net economic stimulus to the Baltimore CBD. This potential loss would only be temporary, however, as the overall project is expected to be a catalyst that would stimulate new private investment in upgrading and modernizing adjacent facilities.

Displacement and Employment

Property acquisition for the proposed project would require the relocation of nine active commercial establishments which are currently in operation within the project site area. The remaining properties on the three impacted quadrants of City Block 596 are vacant or have been cleared by the MTA.

The Hutzler operation could be consolidated into the remaining Hutzler buildings on the northeast quadrant of the block. The other businesses in the project site area would have the options of relocating to a desired location elsewhere downtown (dislocated tenants will be given a right of first refusal to occupy space in the new facility), moving to an outlying community shopping district, or ceasing operations.

The adverse impacts resulting from displacement and relocation would be: any business losses and interruptions experienced by the relocated stores and losses (temporary and/or permanent) in employment (currently employment levels on the project site are approximately 120-150, not including Hutzler's).

Municipal Services and Revenues

During the short-term construction period, the proposed project would adversely impact the City in terms of lost tax revenues. The short-term revene losses, based on current (1977) assessments and rates would total $121,200 per year, but this loss must be viewed in the context of a potential annual tax revenue of between $.35-.8 million dollars from the project (at current rates) once it is fully operational.

Since significant parts of project construction would overlap with MTA subway construction activity, no significant additional demands on City services (e.g. police for traffic control duties) would be generated by Baltimore Gardens during this phase. Once the project is operational, the expanded activity hours and the number of off-street stores and pedestrian pathways may require an increase in police patrols to provide security.

Noise

Noise impacts during construction of the proposed facility would be generated by the equipment used in construction of the project and by the trucks required to move the materials and equipment to and from the site. The large compressors, paving breakers, drills, tractors, and blasting that would be required for the job can create high noise levels.

8.0 RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The proposed project would have the long-term effect of stimulating the revitalization of the retail district of downtown Baltimore. Completion of the project would provide a direct source of new transit system ridership and act as a catalyst and stimulus for additional related development within the context of the approved downtown master plan. These conditions would all serve to increase the City's tax base, reverse the prior trend of downtown deterioration, and thus significantly enhance downtown. The project would also increase productive use of the transit system by increasing patronage without adding to capacity requirements or operating costs.

In comparison with this stimulus to long-term productivity, the existing and potential short-term uses of the area without the project are anticipated to be of marginal and declining productivity. Conditions in the City's retail core have been deteriorating over the past several years. Sales volumes, activity levels, physical conditions, and tax revenues have all been declining and would almost certainly continue to do so. One of the major department stores in the region closed its downtown store last year. The four remaining department stores have expressed their concern with the retail district's deteriorating conditions.

Some of the existing small retail establishments (particularly those along the Lexington Street Mall) appear to be operating at reasonable levels, but others have deteriorated and vacancy rates are beginning to rise. Without the proposed project, little stimulus would exist for upgrading of existing shops or merchandising practices and the short-term productive use of the area would continue to diminish.

9.0 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

9.1 Commitments of Natural Resources

Construction of the project would commit various materials used for site preparation, and concrete, steel or other materials used in structures. It is not expected that any of the materials used will severely deplete resources that are currently in short supply either in the study area or in other parts of the country. A certain (but as yet undetermined) amount of energy would be consumed during construction. This consumption should be at least partially offset by the fact that the new facilities to be constructed would be more energy-efficient and would contain less total floor space, under the higher intensity of development scheme, than the old buildings they are replacing.

9.2 Commitments of Human Resources

Construction of the project and the manufacture of materials used in construction would commit many hours of human labor (on the order of 400-600 man-years). However, with the present high unemployment rates (especially in the construction sector) labor is a plentiful resource, and the use of workers in productive employment would be seen as a positive impact.

9.3 Commitments of Community and Financial Resources

The proposed project would require the commitments of the following resources:

- the loss of the structures to be acquired and razed. These consist of: up to 14 structures currently occupied by 10 first-floor retail establishments; a vacant large 6-story complex and 3 other buildings which formerly housed a department store and another 5-story structure currently occupied by a portion of a second department store. Some of the noteworthy facades of these structures may be retained to prevent loss of historic resources. The structures involved would require structural upgrading and/or reworking in order to retain continuing functional utility.

- the temporary loss of annual tax revenues in the amount of $121,200 (at current values and rates) from the land and structures to be acquired. This loss would be incurred for a period of about five years, until the project is completed. This temporary loss would be more than offset by a net increase in annual tax revenues (at current rates) from the project properties in the amount of $346,000 (Scheme C) or $479,000 (Scheme D).

- the expenditure of an estimated $20-35 million in public and private sector capital costs.

- secondary (induced) development impacts on abutting properties and/or other sections of the core study area ultimately could require further financial and property resource commitments of a similar nature to upgrade existing establishments and accomplish the overall revitalization of the City's downtown retail sector.

10.0 COMMENTS AND RESPONSES ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

10.1 Introduction

The circulation period for the Draft EIS began on August 25, 1978 and ended on October 23, 1978. Ten commenting letters were received from federal, state, and local agencies, and from concerned organizations. A public hearing on the DEIS was held on September 26, 1978 at the Central Branch of the Enoch Pratt Free Library, 400 Cathedral Street, Baltimore, Maryland. Testimony was taken on this date before an appointed hearing officer. At the hearing a total of 37 persons presented oral testimony. The transcript of the public hearing may be inspected at the offices of the Urban Mass Transportation Administration in Washington, D.C. and at the offices of the Baltimore City Transit Corridor Development Program, Suite #1444 World Trade Center, Baltimore, Maryland. All substantive comments are included in this chapter with a response provided for each comment. Notations identifying the source of the comments appear after each comment. The material provided in the DEIS has been revised as necessary in this Final EIS in order to adequately address the comments. Changes in the text are identified by a vertical bar in the left margin.

The following agencies, organizations, and individuals commented on the Draft Environmental Impact Statement for the Lexington Market Station Joint Development Project during the circulation period:

American Institute of Architects - Baltimore Chapter

Boucher, William
Baltimore Heritage, Inc.

Charles Center-Inner Harbor Management, Inc.
Clarke, Mary Pat (Hon.)

Dellospedale, Albert
Devine, Bill
Downtown Merchants Association

Egorin, Ted

Gann, David
Greater Baltimore Committee
Greig, Martyn

Hecht's
Herman, Robert
Hess, George
Hochschild-Kohn & Company
Hutzler's

Irby, Nathan

Levi, Julius
Lexington Market Authority

Manekin, Bernard
Manger, Alvin
Maryland Department of Economic & Community Development
Maryland Historical Trust
Maryland Department of Health & Mental Hygiene
Environmental Health Administration
Maryland Department of State Planning
Maryland Department of Transportation
Mass Transit Administration
Maryland Historical Trust - Baltimore City Committee
Max, Jordan
Monaghan, Kathleen
Mt. Royal Improvement Association
Merchants' Committee for Downtown

Pearlstone, Jack

Reich, Larry
Regional Planning Council
Retail District Project Area Committee
Retail Merchants Association

Schafer, Douglass
Schafer, Harry
Serio, Gloria
Soistman, Charles
Spero, Constantine
Stewart's
U.S. Department of Agriculture
Soil Conservation Service
U. S. Department of the Interior
U. S. Environmental Protection Agency
U. S. Department of Transportation
Office of the Secretary

10.2 Comments and Responses

Comment 1:

One of the preferred alternatives, Scheme D, set forth in the Draft EIS is not consistent with the programs of the Maryland State Historic Preservation Office. (Maryland Department of Economic & Community Development, Maryland Historical Trust)

Response 1:

The Scheme D alternative provided for the demoliton of all buildings within the project site area with the single exception of the building at 223 North Eutaw Street (Arthur's Bakery), the historic front part of which would be moved to an appropriate relocation site in the immediate vicinity. The overall demolition characteristic of Scheme D has been rejected in the selection of the Proposed Action. Mitigation measures to protect historic properties are set forth in Chapter 6.

Comment 2:

The retention of the building at 316-318 West Lexington Street (Leon Levi), or its facade, and/or the building at 320-322 West Lexington Street (Murphy Building), or its facade, as proposed under Alternatives A, B, and C, would cause serious construction problems, increase construction costs considerably, and delay the start of the Lexington Market Station southeast public entrance. (Maryland Mass Transit Administration).

Response 2:

The retention of the buildings or facades at 316-318 and 320-322 West Lexington Street has not been included in the Proposed Action due to the negative impact such retention would have on Mass Transit Administration construction plans for the southeast public entrance. In addition, the height and scale characteristics of the two buildings made their successful integration into the proposed development infeasible.

Comment 3:

Maximizing the preservation of the buildings in Baltimore's retail district will maximize the success of the revitalization of the area. (Maryland Historical Trust - State Historic Preservation Officer.

Response 3:

Other individuals and groups testifying at the public hearing, and providing written comment on the draft Environmental Impact Statement, expressed the view that significant demolition in the retail district area, and particularly within the proposed project site, was urgently necessary for the successful revitalization of the area. It should be noted that the proposed project area includes three-quarters of one developed block in a 24 block downtown retail district. While there is broad agreement on the principle of maximizing the preservation of buildings within the overall retail district, the Proposed Action represents an effective compromise between demolition and preservation within the specific project block. The Proposed Action seeks the preservation of those historic attributes of enduring value, while proposing the demolition of structures where necessary for public and private construction and development feasibility. Specific historic preservation mitigation measures for the project site area are set forth in the Memorandum of Agreement (Chapter 6).

Comment 4:

Sediment control had not been addressed with regard to the approximately 77,300 cubic yards of excavated material which must be disposed of at one or more landfill areas. (U.S. Department of Agriculature, Soil Conservation Service).

Response 4:

Baltimore City Ordinance #1013, which provides for an erosion control program and requires sedimentation, trash, and debris control, applies both to on-site construction areas and off-site disposal sites within the City. There is ample capacity at sites in Baltimore to accommodate the excavated material from the project site area.

Comment 5:

As part of a noise attenuation program, augering should be employed in lieu of pile driving and consideration should be given to the use of portable loaded vinyl screens when jack hammers and rock drills are used. (Maryland Department of Health & Mental Hygiene, Environmental Health Administration).

Response 5:

Augering would be used instead of pile driving to eliminate the worst potential noise hazard and consideration will be given to using portable loaded vinyl screens when jack hammers and rock drills are used.

Comment 6:

The Metropolitan Clearinghouse received comments on the Draft EIS from the following jurisdictions: Anne Arundel County, Baltimore City, Baltimore County, Carroll County, Harford County, and Howard County. All of the jurisdictions found the Lexington Market Staion Joint Development Project to be either consistent with or contributing to the fulfillment of local comprehensive plans, goals, and objectives, or they had no comment on the particular project. (Baltimore Regional Planning Council).

Response 6:

No response required.

Comment 7:

Baltimore's retail district requires major revitalization and redevelopment on an appropriate scale to reverse the current downward trends in retail sales and to arrest the physical deterioration of the downtown retail area. Of the various alternatives set forth in the Draft EIS, only Scheme D offers a developer the degree of flexibility and the higher intensity of new development which are the prerequisites for a successful undertaking. (William Boucher, III). Similar comments endorsing Scheme D were received from the following individuals and organizations:

Albert Dellospedale

Bill Devine
Ted Egorin
Greater Baltimore Committee
Martyn Greig
Hecht's
George Hess
Hochschild-Kohn & Company
Hutzler's
Lexington Market Authority
Bernard Manekin
Alvin Manger
Maryland Department of Transportation
Mass Transit Administration
Jack Pearlstone
Retail Merchants Association
Douglas Schafer
Harry Schafer
Gloria Serio
Charles Soistman
Constantine Spero
Stewart's

Response 7:

The proposed action provides for new development in every portion of the project site area, and incorporates the higher intensity of development as set forth in Scheme D, including the possible creation of up to 200,000 square feet of new office and/or residential space at higher levels within the project site.

Comment 8:

Of the alternatives set forth in the Draft EIS, Scheme C allows for much-needed major new development within the project site area while preserving the existing facades on the site which have recognized architectural and historical value. Scheme C would also maintain the pedestrian activity and street ambience of the area. (Retail District Project Area Committee). Scheme C was endorsed by the following individuals and organizations:

Baltimore Heritage, Inc.
Downtown Merchants Association
Julius Levi
Jordan Max
Merchants Committee for Downtown

Response 8:

Significant elements of Scheme C have been retained in the proposed action (see Chapter 6).

Comment 9:

One of the stated reasons for relocating the subway entrance is to enhance ridership potential (DEIS, page 3-39). Furthermore, page 3-27 states that the no-action alternative is viewed as inconsistent with national and local public policies which seek to encourage public transit ridership in urban areas, and the fullest utilization of the transit installation now under construction. Yet on pages 5-31 thru 5-34, the DEIS talks of providing several parking facilities which could conceivably include 2100 or more spaces. We agree that failure to provide parking to meet generated demand is not desirable, but we further believe that providing parking in excess of demand is contradictory to the same national and local public policies with which the no-action alternative was deemed inconsistent. Since the preliminary findings of the study being undertaken by the Baltimore Planning Department and the Baltimore Off-Street Parking Commission reveals a surplus of 1200 spaces in 1982, and since the incremental parking demand in the study area with Scheme D is projected to be only 1300 spaces, we believe that the proposal to provide such a great amount of parking may serve only as a disincentive to transit ridership. (United States Environmental Protection Agency and Department of Transportation, Office of the Secretary).

Response 9:

The projected 1982 surplus of 1,200 parking spaces within the Core Study Area does not take into account either the distinction between demand for short-term vs. long-term parking or the functional obsolescence of the existing parking facilities. The Metro-Center Parking Study noted that 94% of the Core Study Area's parking spaces are long-term spaces (4,200 out of a total of 4,500). By 1980, the Study projected a deficit of 1,000 short-term spaces within the area. The projected surplus consists entirely of long-term spaces and 90% of these surplus spaces exist within parking structures which are considered functionally obsolete for short-term parking use. Furthermore, the new Social Security Administration facilities will open in late 1979, and it is projected that SSA employees will utilize the existing surplus long-term parking within the Core Study Area (the SSA is providing only 500 parking spaces for its 5,800 employees). The Proposed Action would provide 400 parking spaces on site to meet the project-generated parking demand.

Comment 10:

We also believe that there should be a more detailed study of alternatives which would reduce regional VMT and mobile source emissions. Such alternatives might include reducing the number of proposed parking spaces, and the encouragement of carpooling and vanpooling. Furthermore, the final EIS should discuss the proposed parking facilities in terms of regional Transportation Improvement Programs and Transportation Control Plans. Specifically, how will the provision of parking in this area conform with the Baltimore Transportation Control Plan. (United States Environmental Protection Agency).

Response 10:

As noted in the previous response, the Proposed Action includes only 400 parking spaces on-site, to meet project generated parking demand. The

management of parking supply is an element of both the TCP and the State Implementation Plan. The transportation Control Plan specifies initiation or continuation of action in the following areas by 1982:

1) park-and-ride lots
2) encouragement of carpooling
3) encouragement of vanpooling
4) preferential parking for ridesharing vehicles

In addition, the TCP makes a commitment to study, for implementation feasibility and effectiveness, the following parking-related issues:

1) staggered or flexible hours
2) increased parking fees.

With respect to parking management, the focus of the TCP is on the reduction of parking demand (and thus trips and VMT) associated with the all-day work trip. This is appropriate given a pattern of travel in which the work trip constitutes a high percentage of the peak-period trips and VMT, and it is believed to be the most effective means of using parking-related management tools to achieve air quality improvements.

The City and the region have considerable experience in the use of park-and-ride and carpool/vanpool preference parking programs. The City Council has approved a commitment to maintaining the current carpool preference parking program (which makes use of metered spaces on temporary parking lots developed on vacant urban renewal disposition lots). It should be emphasized that the role of the proposed garage is to provide convenient, relatively low-cost parking for the shopping patron. All the market analyses to date, as well as discussions with potential developers, make it clear that convenient parking is an essential component of any kind of retail redevelopment project.

Comment 11:

In light of the existing air quality in the Baltimore Region, which is in excess of National Ambient Air Quality Standards (NAAQS) for several of the mobile source related pollutants, every effort should be made to reduce Vehicle-Miles-Of-Travel (VMT) and mobile source emissions. (United States Environmental Protection Agency)

Response 11:

The revised State Implementation Plan (and the Transportation Control Plan which is a part thereof) indicates that even before the relaxation of the oxidant standards, the Baltimore Region would be in compliance with the National Ambient Air Quality Standards by the year 1987, the deadline established by law.

It should be noted that an important aspect of all of the City's downtown revitalization efforts -- including the Proposed Action -- is the concentration of activities in a tight geographic area in which shoppers, workers, and visitors can easily move about among activity centers, either by walking or by using the bus or the rapid transit line.

Comment 12:

While we acknowledge that the results of the air quality analysis indicate no violations of 1 or 8 hour carbon monoxide standards, further information must be included in the final EIS in order for EPA to evaluate whether these results are actually worst case concentrations. The final EIS should indicate what reference document was utilized in computing emission factors. Supplement No. 8 to EPA's publication AP-42 is the most recent source and should be used in future air quality analyses. Furthermore, we are interested in knowing the methodology used in determining the microscale concentrations. Worst case carbon monoxide concentrations are generately found at low wind speeds (1 m/s), during winter temperatures, and at Stability Class E or F. These inputs and a model endorsed by EPA should be used in worst case modeling. If this has not been the case, then the air quality analysis presented in the draft EIS should be revised. (United States Environmental Protection Agency)

Response 12:

Emission factors for the Baltimore Region were computed using the VEHMI program developed by Walden Research, which is based on Supplement No. 5 to EPA Document AP-42, the applicable reference document at the time the analysis was undertaken in early 1978. Microscale concentrations for the worst case (peak traffic exiting from the parking garage at store closing) were analyzed on the basis of procedures contained in Vol. 9, "Guidelines for Air Quality Planning and Analysis," dated January 1975. The assumptions with respect to the proportion of vehicles subject to cold-start conditions and departure patterns are presented on page 5-48 of the DEIS. The precise quantification of CO emissions is primarily a function of garage size and peaking characteristics, given an assumed vehicle mix within the fleet. The adjustment noted above to the size of the proposed garage implies a proportional reduction in CO emissions during the PM peak.

Comment 13:

As a final point, we must note that while the analysis in the DEIS projects CO concentrations when traffic levels generated by the project are highest, it does not project CO levels when traffic on the adjacent streets is at it's peak. Therefore, the final EIS should also project the CO concentrations along the adjacent streets during their peak traffic periods for both build and no build situations. Background levels should be added to the modeling results. (United States Environmental Protection Agency)

Response 13:

The analysis in the DEIS employed CO concentration measurements taken at AIRMON I, the closest air monitoring station to the project site, located at Lombard and Penn Streets in Downtown Baltimore. Both average daily traffic (ADT) and peak-hour volumes were higher at AIRMON I than on the streets which bound the proposed project site. Thus, adding background concentrations measured at AIRMON I to project-generated air pollution overstates the worst case condition which could be expected with project implementation.

Comment 14:

"The Department would not concur with the selection of Alternative D. It appears that Alternative C, and possibly Alternatives B and B-1, are feasible and prudent alternatives that meet both the requirements of Section 4(f) and meet the objectives of the mass transit proposal. This Department strongly recommends the selection of the alternative which is economically viable and which retains the greatest amount of the historical and architectural integrity of the properties involved." (United States Department of the Interior).

Response 14:

The alternative which has been selected -- the Proposed Action described in chapter 4.0 of this final EIS -- has been chosen as one which is both economically viable and retains the greatest degree of historical and architectural integrity of the properties involved. Specific historic preservation measures to safeguard and maintain the historical and architectural integrity of this built environment are described in the executed Memorandum of Agreement included in chapter 6.0 of this EIS.

Comment 15:

Arthur's Bakery should remain in place at 223 North Eutaw Street. The draft Environmental Impact Statement does not explain why it is necessary to move it or how it would be moved. (Baltimore Heritage, Inc.; Hon. Mary Pat Clarke).

Response 15:

The Proposed Action is consistent with the two preferred alternatives described in the draft EIS (Page 6-22) in requiring the relocation of the historic front part (approximately 18 x 35) of Arthur's Bakery above the basement level and the demolition of the newer, rear portion. The purpose of the relocation is twofold: 1) to remove the historic structure from its present location at the midpoint of the Eutaw St. edge of the joint development project area, where its size, style, and scale render any compatibility with planned new construction infeasible; and 2) conversely, to place Arthur's Bakery in a harmoniously scaled building row. The historic front part of Arthur's Bakery would be moved using conventional house-moving techniques.

Comment 16:

The facades of the Murphy and Leon Levi Buildings at 316-318 and 320-322 West Lexington Street should be retained. (Baltimore Heritage, Inc.).

Response 16:

Consistent with the provisions of the executed Memorandum of Agreement for this project (chapter 6.0), the Proposed Action requires the demolition of these structures, including their facades. It was found to be both imprudent and infeasible to retain these facades at their present locations due to the impact such retention would have on the MTA's

construction of the Southeast Public Entrance facilities for the Lexington Market Transit Station. The height and scale characteristics of the two buildings and their facades make their successful integration into the proposed development infeasible. Relocation of the facades to an alternative location was found to be technically and economically infeasible.

Comment 17:

There should be no acquisition or demolition of buildings referred to in the draft Environmental Impact Statement until money for new development is available and a developer is under contract. (Baltimore Heritage, Inc.; Hon. Mary Pat Clarke

Response 17:

This has been adopted as City policy for this project. Current acquisition and demolition has been limited to the portion of the project site area necessary for the immediate construction of the Southeast Public Entrance facilities by the Mass Transit Administration.

Comment 18:

"Scheme D does allow for a mixed-use, higher density of development pattern for the project which our department feels to be highly desirable at a major downtown subway station. We find this higher intensity of development pattern preferable both from the viewpoint of revitalizing the retail district and encouraging transit ridership. Therefore, while we advocate Scheme C with respect to the desired retention of facades, we also advocate some flexibility in terms of mixed-use, higher intensity development which will result in a more viable commercial product." (Mr. Larry Reich, Director of Planning, City of Baltimore).

Response 18:

The Proposed Action incorporates the desired retention of facades described under Scheme C in the draft EIS with the mixed-use, higher intensity of development features described under Scheme D in that document.

Comment 19:

We recommend that the City..."Allow the important buildings, particularly the Hutzler's Palace and Hochschild Kohn Building and Arthur's Bakery to remain standing where they are. Encourage the selected developer or developers to use the buildings as a design guide for new construction if there must be new construction." (Maryland Historical Trust - Baltimore City Committee).

Response 19:

Design guidelines for the joint development project will be developed by the City and reviewed by the Maryland State Historic Preservation Officer.

Although we are anxious to see new development take place, we are disturbed by the larger scale development projected by Scheme D. Assuming either minimum or maximum development, Scheme D projects from thirty-five to fifty per cent more speciality store area as Scheme C and from twenty-five to thirty-five per cent more department store space. We believe that in view of the excess department store space presently existing in the area -- one department store has announced it may close; the others have reduced the number of floors they operate -- the greater amount of new department store space envisioned by Scheme D is unnecessary and unlikely to find tenants. We also feel that although new specialty store space is needed in the area, the existance of a large amount of specialty store space in the area now and the likelihood that one or more department stores may close and those buildings will be available for speciality store development argues that the smaller development of Scheme C has greater chances for success itself and a better chance for helping in the rehabilitation of the general area. (Mr. Jordan Max).

Response 20:

The higher intensity of development features described under Scheme D in the draft EIS have been incorporated in the Proposed Action in order to provide greater flexibility to the developer to be selected by the City, as well as to provide a stronger basis for the revitalization of the City's Downtown Retail District. Economic feasibility analyses conducted by Halcyon in late 1978 for the project have indicated that the larger amounts of specialty and department store floor area described under Scheme D can be successfully absorbed within the retail space inventory of the Downtown Retail District, based on the phased implementation of a major revitalization program for this area.

Comment 21:

"Another major advantage of Scheme C over Scheme D is better preservation of the existing patterns of street activity. This pedestrian activity has served to nourish the existing specialty retailing and, of course, the Lexington Market." (Mr. Jordon Max).

Response 21:

A major goal of the Proposed Action is the preservation and enhancement of existing patterns of pedestrian activity within and around the project site. To this end, the project includes a two-block extension of the Lexington Street Mall, the orientation of the Southeast Public Entrance escalator and stair facilities outward toward existing Lexington Street shops, and provision for the development of active, supporting retailing uses along the Howard, Lexington, Eutaw, and Saratoga Street edges of the joint development site.

Comment 22:

The Maryland Mass Transit Administration has agreed not to acquire the properties at 401-03-05 West Lexington Street through condemnation as part of its current lease for temporary use of those properties. (Mr. H. David Gann, Esq.).

Response 22:

The Proposed Action includes the environmental impact analysis necessary for possible future public acquisition of the properties at 401-03-05 West Lexington Street for the purpose of constructing a future southwest public entrance to the Lexington Market Transit Station. Such acquisition, if it occurs, would be by the City of Baltimore and not by the State of Maryland's Mass Transit Administration, as part of the Lexington Market Station Joint Development Project.

Comment 23:

"I would be opposed to any future development of downtown which would any more cut down traffic. We have a terrible traffic pattern in Baltimore right now. We simply cannot get the people to take the mass transit system, irrespective of the subway, a blessed memory; but I'm telling you people want to drive their cars to downtown Baltimore, and the people who are supporting downtown Baltimore, the professional set, the lawyers, the insurance people, the stockbrokers, those people drive their cars, and they have secretaries who drive their cars. The more streets you block off with malls, and the more streets that you block off with development, the worse traffic is going to be, and it is going to be an ever cycling problem that is just going to create less and less opportunities for people to come down to Baltimore for retail purposes." (Mr. H. David Gann, Esq.).

Response 23:

The Proposed Action includes a two block extension of the existing Lexington Street Mall, from Howard to Paca Street. These portions of Lexington Street do not carry significant volumes of traffic, and are not major arterial facilities in the downtown street system. Major public support for this extension of the Lexington Street Mall was indicated by an RTKL Associates public opinion survey conducted in 1975, and again by voter approval of a $2.5 million bond issue for the downtown retail district in November, 1978. It is anticipated that the remainder of the streets within and around the project site will be improved as major traffic/transit circulation facilities.

Comment 24:

"... Moving the (Arthur's Bakery) building, I think, would take away from the value of the building itself, preservation-wise. It would not be as valuable on another site as it is on its original site, moving the facade, you know, or even if they want to move the building, am I going to be in the building? They could preserve my building and say, "We will now relocate your business." (Mrs. Kathleen Monaghan).

Response 24:

The Proposed Action includes the relocation of the historic front portion of Arthur's Bakery to an appropriate relocation site in the immediate vicinity of its present location, with provision for approval of the selected site by the Maryland State Historic Preservation Officer. The EIS indicates two possible alternative sites in the 400 block of West Saratoga Street, where the relocated structure would be compatibly sited with row buildings of harmonious size and scale. It is the intention of the City to undertake every feasible and prudent measure to assist the Arthur's Bakery business to continue to be located within its historic building at a new location. City Commercial Revitalization assistance will be made available to achieve this goal.

Comment 25:

Arthur's Bakery would suffer as a business if it were moved away from the Lexington Market. (Mrs. Kathleen Monaghan).

Response 25:

The Proposed Action requires the relocation of the historic front portion of Arthur's Bakery within the immediate proximity of the Lexington Market.

Comment 26:

"The demolition of the Hochschild-Kohn Building on the corner of Saratoga and Eutaw, and the required demolition of the buildings in the southwest corner of Lexington and Eutaw for the transit station entrance already open substantial opportunities for the necessary reconfiguration. However, expansion of new building beyond these two quadrants requires a detailed evaluation by the City and the project developers as to the exact nature of the new activity centers, and how well these activities and their physical enclosures relate to and perpetuate the area's present urban fabric.

Many cities, including Baltimore, should learn from the past that wholesale demolition of structures without a planned, orderly, progressive growth factored into their replacement can result in new urban cure that is a far too bitter pill to swallow.

We recommend that detailed evaluation be given to preservation of those structures deemed rehabitable, particularly along the Howard Street corridor, and that we minimize the effort to retain facades as a skin to cover unrelated or unresolved uses behind it. Full consideration should begiven to restoring those buildings that meet the economic objectives of the developer, and which have significance both to the history and progress of Baltimore as one of the country's first retail centers." (Mr. James R. Grieves).

Response 26:

The Proposed Action, and the detailed Inventory of Historic, Cultural, and Architectural Resources of February, 1978, has included detailed evaluation of all structures within the project site area and its environs. In the development of the Proposed Action, special attention has been given to structures viewed as rehabitable, including the major structures along the Howard Street edge of the site. Full consideration will be given to retention, restoration, rehabilitation, and recycling of the buildings specified in the executed Memorandum of Agreement for the project (see chapter 6.0). The City will work closely with the selected developer toward these goals.

Comment 27:

"It should be noted that we strongly object, most vigorously oppose, and question the wisdom of the secondary development concepts as indicated by Section 4.3 and Figure 4.1 suggesting: The possible future treatment of adjacent blocks of North Howard Street as a transit mall; and, too, the possible future construction of connecting second level linkages between the specialty retailing development within the project site and other major retailing uses surrounding the Howard and Lexington Street corner.

By adoption of these possible secondary concepts, those retailers who reside along the Howard Street corridor, are effectively isolated and removed from normal pedestrian traffic. In creating pedestrian walkways, the deterioration and eventual termination of Howard Street retailing is assured." (Downtown Merchants Association).

Response 27:

The illustrative future, or "secondary" development concepts were identified in the draft EIS in order to provide reasonable anticipation of the types of additional public and private actions which might occur within and around the project site as indirect results of implementing the proposed project. All of the illustrative secondary development actions require separate funding, official approvals, or private development initiatives not included in the current joint development project. All planning efforts by the City will be directed toward full inclusion of retailers along the Howard Street corridor, and no plans for developments of the types mentioned will be undertaken by the City without extensive prior consultation with all affected merchants.

Comment 28:

"It appears that a sensitive combination of Schemes B and C would best meet the requirements of Sections 4 (f) and 106, while also serving transit and urban development needs." (U. S. Department of Transportation, Office of the Secretary).

Response 28:

The proposed action incorporates elements of both Schemes B and C. It provides for the relocation of the original portion of Arthur's Bakery and for the retention of all or substantial portions of the buildings located at 200-218 North Howard Street and 300-306 West Lexington Street. It also provides for the retention of the facades of the Hutzler's Palace Building (210-218 North Howard Street) and the Hochschild-Kohn complex (200-208 North Howard Street/300-310 West Lexington Street). (See Section 6.4, Alternatives to the Proposed Action A, for a further discussion.)