



**FEDERAL AVIATION ADMINISTRATION**

**EASTERN REGION**  
AIRPORTS DIVISION

**Short Environmental  
Assessment Form  
for  
AIRPORT DEVELOPMENT  
PROJECTS**



Airport Name: Baltimore/Washington International Thurgood Marshall Airport Identifier: BWI

Proposed Project: Proposed Demolition of Sheraton Four Points Hotel at BWI Marshall

This Environmental Assessment becomes a Federal document when evaluated, signed, and dated by the Responsible FAA official.

  
\_\_\_\_\_  
Responsible FAA Official

28 AUG 2014  
Date

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**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
FINDING OF NO SIGNIFICANT IMPACT**

Baltimore/Washington International Thurgood Marshall Airport  
Anne Arundel County, Maryland

Demolition of Sheraton Four Points Hotel

- 1. Introduction.** This document is a Finding of No Significant Impact (FONSI) on the environment as a result of the proposed hotel demolition project by the Maryland Aviation Administration (MAA), owner and operator of Baltimore/Washington International Thurgood Marshall Airport (BWI Marshall). The proposed hotel complex demolition project footprint is approximately 8 acres.

Federal Aviation Administration (FAA) must comply with the National Environmental Policy Act of 1969 (NEPA) before being able to take the federal action of further processing of an application for Federal assistance in funding various airport development and for approval of the Airport Layout Plan (ALP) that depicts the proposed airport development projects. Approval of the ALP is authorized by the Airport and Airway Improvement Act of 1982, as amended (Public Laws 97-248 and 100-223). The issuing of this FONSI does not constitute a commitment by the FAA to provide federal financial assistance for these actions.

- 2. Project Purpose and Need.** The proposed action is to eliminate potential safety hazards and financial obligations associated with the aging hotel by demolishing the structures and outdoor swimming pool included in the project site. The added expense to maintain and provide security for the unoccupied hotel impacts the operating budget and therefore by removing the aging building complex it will also allow for future use of this land.
- 3. Proposed Project.** The proposed project consists of the demolition and removal of all five hotel building structures totaling 135,000 square feet and the outdoor swimming pool, followed by grading and seeding of the disturbed areas. Because of the potential use of the parking lot in the future, there will be no pavement removal.
- 4. Reasonable Alternatives Considered.** As described in Section 5 of the attached Environmental Assessment (EA), alternatives, to include the no action alternative, were evaluated for the proposed project.
- 5. Assessment.** The attached EA addresses the effect of the proposed project on the quality of the human and natural environmental, and is made a part of this finding. The following impact analysis highlights the more thorough analysis presented in the EA prepared in April 2014.

**Air Quality.** The airport is located within the U.S. Environmental Protection Agency's (EPA) designated nonattainment area for the pollutants of ozone (O3) and particulate matter equal to or less than 2.5 micrometers (fine particulates or PM2.5). Therefore, the EPA's General Conformity Rule applies and an air quality analysis must be prepared for the proposed hotel development project. The emission levels do not exceed any applicable de minimis threshold levels for the proposed project area (EA-Attachment 1 and Table 1).

**Coastal Resources.** The project area falls within the Maryland Coastal Zone Management area and therefore must comply with Federal and State Coastal Zone regulations. A Federal Consistency review was submitted as part of the draft EA. Maryland Department of the Environment concurred that the proposed action is consistent with the Maryland Coastal Zone Management Program (EA-Attachment 2).

**Hazardous Material.** The hotel complex contains hazardous materials, including asbestos-containing materials (ACM), lead based paint (LBP), Polychlorinated biphenyls (PCB) light ballasts/electrical equipment, mercury-containing lighting/thermostats/devices and stored chemicals. No aboveground or visual evidence of underground storage tanks were observed on the property. The remediation of hazardous materials was expected to commence in April 2014 and will take approximately six weeks to complete. In June of 2012, a Phase I Environmental Site Assessment (ESA) was performed by an Environmental Professional (EP) as defined in 40 CFR §312.10 in conformance with the scope and limitations of ASTM Practice E 1527-05. In accordance with these federal statutes, federal regulations under 29 CFR Parts 1910 and 1926, 40 CFR Parts 61 and 761, 49 CFR Parts 171-173, and Code of Maryland Regulations (COMAR) 26.11.21 and 26.13.10, remediation of all hazardous materials will be conducted prior to demolition of the hotel buildings, therefore no release or exposure of hazardous materials is anticipated (EA-Attachment 3).

**Historic, Architectural, Archeological and Cultural Resources.** The Section 106 Consultation was initiated in March 2014 and based upon the review of information provided, the Maryland Historic Trust determined that the project will have "no effect" on historic properties and that the federal and/or state historic preservation requirements have been met for the proposed demolition project (EA-Attachment 2).

6. **Public Participation.** The Draft EA was made available for public review from June 3, 2014 to July 3, 2014 (EA-Attachment 4).
7. **Mitigation Measures.** The FAA requires that Maryland Aviation Administration implement the following conservation measures, if it decides to pursue the proposed project:
  - a. Develop and implement erosion and sediment control measures in accordance with the latest version of the Maryland Standards and

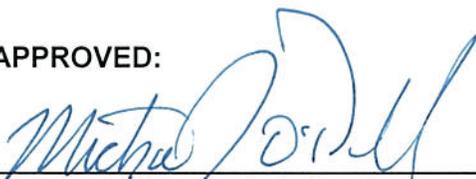
Specifications for Erosion and Sediment Control Handbook and Maryland Stormwater Management Laws and Regulations.

- b. Best management practices (BMPs) will be followed to avoid and minimize any potential impacts to the environment.
- c. All required permits and approved plans for the proposed project must be obtained prior to construction.
- d. Construction contract provisions must contain the provisions of FAA AC 150/5370-10E, *Standards for Specifying Construction of Airports* item P-156, temporary air, water pollution, soil erosion and siltation control and FAA AC 150/5320-5C, *Airport Drainage*.

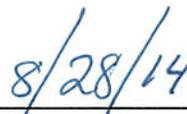
**Finding of No Significant Impact**

I have carefully and thoroughly considered the facts contained in the attached EA. Based on that information I find that the proposed Federal action is consistent with existing national environmental policies and objectives as set forth in section 101(a) of the National Environmental Policy Act of 1969 (NEPA). I also find the proposed Federal Action, with the required mitigation referenced above will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to section 102 (2)(C) of NEPA. As a result, FAA will not prepare an EIS for this action.

**APPROVED:**



Michael J. O'Donnell, Acting Manager  
Washington Airports District Office



Date

**DISAPPROVED:**

\_\_\_\_\_  
Michael J. O'Donnell, Acting Manager  
Washington Airports District Office

\_\_\_\_\_  
Date

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- Attachment 1: Air Quality Emissions Inventory and Construction Assumptions
- Attachment 2: Agency Consultation and Response to Comments
- Attachment 3: Hazardous Materials Reports
- Attachment 4: Notice of Availability
- Attachment 5: Maryland Environmental Assessment Form

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*This form is to be used only for limited types of projects. It is strongly recommended that you contact your local Environmental Protection Specialist (EPS) before completing this form. See instructions page.*

## APPLICABILITY

This Form can be used if the proposed project meets the following criteria:

- 1) It is not categorically excluded (see paragraphs 303 and 307-312 in FAA Order 1050.1E) or
- 2) It is normally categorically excluded but, in this instance, involves at least one extraordinary circumstance that may significantly impact the human environment (see paragraph 304 and the applicable section in Appendix of 1050.1E) or
- 3) The action is one that normally requires an EA at a minimum (see paragraph 506 in FAA Order 5050.4B) and
- 4) The proposed project must fall under one of the following categories of Federal Airports Program actions:
  - (a) Approval of a project on an Airport Layout Plan (ALP).
  - (b) Approval of federal funding for airport development.
  - (c) Requests for conveyance of government land.
  - (d) Approval of release of airport land.
  - (e) Approval of the use of Passenger Facility Charges (PFC).
  - (f) Approval of development or construction on a federally obligated airport.

**If you have questions as to whether the use of this form is appropriate for your project, contact your local EPS BEFORE using this form.**

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**Complete the following information:**

**Project Location**

Airport Name: Baltimore/Washington International Thurgood Marshall Airport      Identifier: BWI

Airport Address: P.O. Box 8766

City: BWI Airport      County: Anne Arundel      State: MD      Zip: 21240-0766

**Airport Sponsor Information**

Point of Contact: Robin M. Bowie, Manager, Division of Environmental Planning

Address: P.O. Box 8766

City: BWI Airport      State: MD      Zip: 21240

Telephone: 410-859-7103      Fax: 410-859-7082

Email: [rbowie@bwiairport.com](mailto:rbowie@bwiairport.com)

**Evaluation Form Preparer Information**

Point of Contact: HNTB Corporation

Address: 2900 S. Quincy Street, Suite 200

City: Arlington      State: VA      Zip: 22206

Telephone: 703-824-5100      Fax: 703-671-6210

Email: [cpinegar@hntb.com](mailto:cpinegar@hntb.com)

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**1. Introduction/Background:**

The Maryland Aviation Administration (MAA) proposes to demolish the Sheraton Four Points Hotel, located on BWI Marshall property at 1 Scott Drive, Baltimore, Maryland (alternate address: 7032 Elm Road). For reference, a general location map of BWI Marshall is provided on **Exhibit 1**. The proposed project is not specifically identified as one that can be categorically excluded in FAA Order 1050.1E paragraphs 307 through 312; therefore the MAA is preparing this Short Environmental Assessment (EA) Form to fulfill the legal requirements of the National Environmental Policy Act of 1969 (NEPA) and FAA Order 1050.1E.

Built in 1965-1970, the hotel is owned by the MAA and was being leased to the BWI Inn Associates D/B/A Sheraton International Hotel for hotel operations. The two-story hotel totals approximately 135,000 square feet and consists of 201 guest rooms, 9,000 square feet of flexible banquet space, a full service restaurant, business center, and fitness facilities. The BWI Inn Associates D/B/A Sheraton International Hotel did not renew the lease with the MAA upon its expiration in 2013, likely due to the investment needed to update and renovate the aging hotel. As a result, ownership reverted back to the MAA following the expiration of the lease contract and the hotel was vacated on December 1, 2013.

The hotel is currently vacant and access to the hotel and associated parking lot are sectioned off in order to restrict access to the public. The demolition of the hotel is identified on the BWI Marshall Airport Layout Plan (ALP) as a project anticipated to occur during the 2021-2025 timeframe. However, because the vacant hotel buildings and outdoor swimming pool are a safety concern and financial liability in their current condition, the MAA desires to demolish the hotel and pool in 2014 and has already received FY 2014 State funding to accomplish this work.

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**2. Project Description** (List and clearly describe ALL components of project proposal including all connected actions). **Attach a map or drawing of the area with the location(s) of the proposed action(s) identified:**

The hotel (project site) is located between Interstate 195 and a parking garage, approximately 200 feet southeast of the intersection of Terminal Road and Aviation Boulevard. **Exhibit 2** provides an overview of the project location in relation to airport property and the surrounding area. The project site consists of approximately eight (8) acres of land and includes five buildings, a pool and onsite surface parking (See **Exhibit 3**). The four buildings that surround the pool (Buildings A, C, D, E) were constructed in 1965, and the additional building to the southwest (Building B) was constructed in 1970.

As shown on **Exhibit 4**, the Proposed Action consists of the demolition and removal of all five hotel building structures and the outdoor swimming pool, followed by grading and seeding of the disturbed areas. The existing paved roadways and parking areas serving the hotel site will remain. Due to the expense of pavement removal and the potential reuse of the parking lot in the future, the parking areas would not be demolished and access to the parking area would remain unchanged. The short term use of the parking area has not been decided; however possible options include a cell phone parking lot or a bus or taxi staging area. A perimeter security fence with appropriate fire rescue vehicle access would be installed on the site during and after the hotel's demolition.

**3. Project Purpose and Need:**

**Purpose**

The purpose of the Proposed Action is to eliminate potential safety hazards and financial obligations associated with the aging hotel by demolishing the structures and outdoor swimming pool associated with the project site.

**Need**

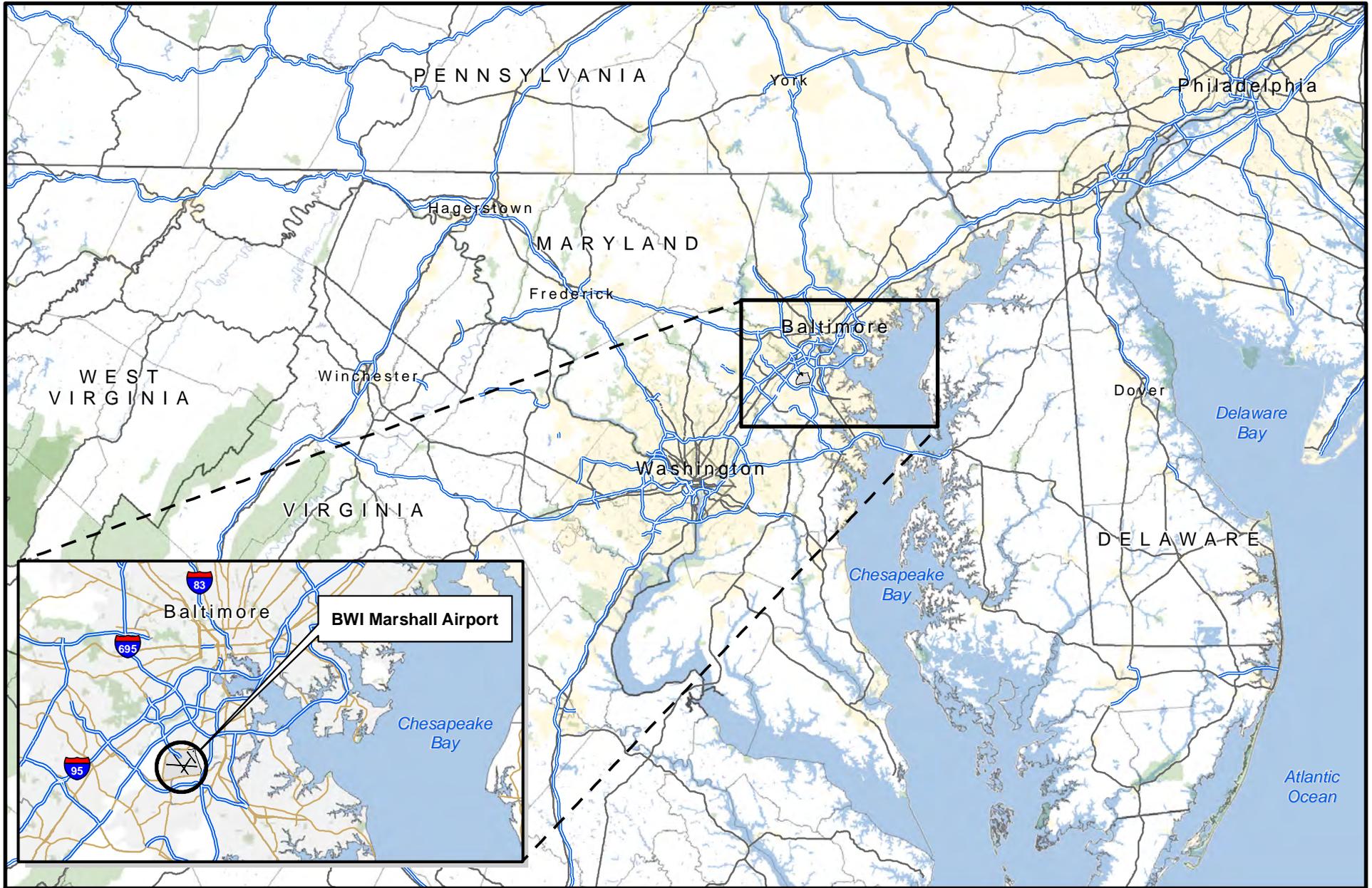
The need for the Proposed Action includes the following:

- There are public safety hazards on the site, including an outdoor swimming pool;
- The vacant hotel building structures present increased liability exposure for the airport;
- The added expense to maintain and provide security for the unoccupied hotel is impacting the airport's operating budget; and
- Removing the aging building complex will allow for the future use of this land.

**4. Describe the affected environment (existing conditions) and land use in the vicinity of project:**

The project site is located on BWI Marshall property in Anne Arundel County, Maryland. The Airport is bounded on the west, north, and east by Aviation Boulevard and on the south by Dorsey Road. BWI Marshall property is identified as "Government" land use in the 2009 *Anne Arundel County Land Use Plan*. A general location map of BWI Marshall is shown on Exhibit

# BWI Marshall Four Points Sheraton Hotel Demolition **Environmental Assessment**



## LEGEND

-  Interstate
-  Highway / Major Road
-  Park / Wilderness Area / Recreation Area

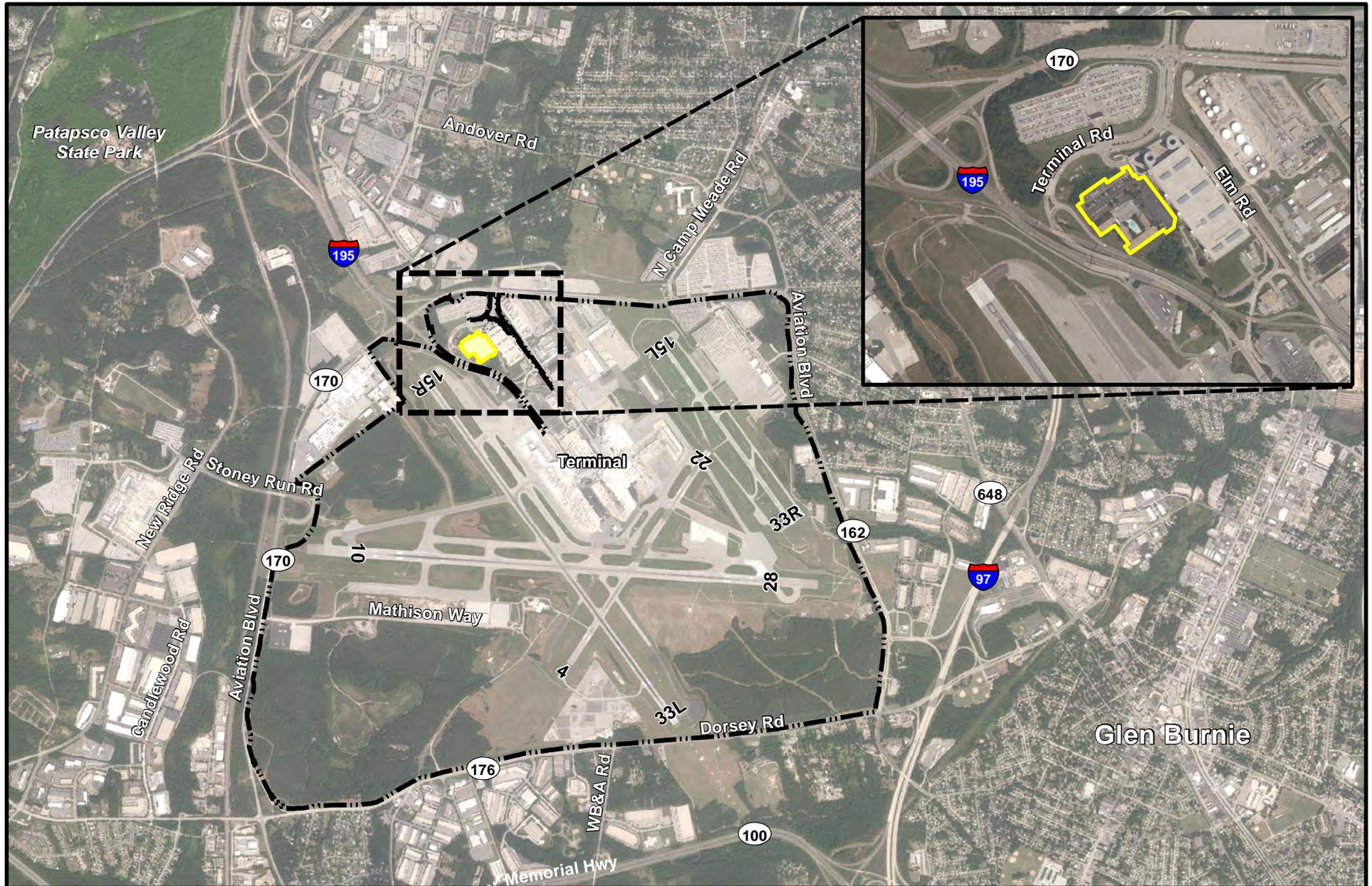
Exhibit 1  
Location Map



0 5 10 20 Miles

Source: ESRI

# BWI Marshall Four Points Sheraton Hotel Demolition Environmental Assessment



## LEGEND

-  Proposed Project Area
-  Airport Property Boundary

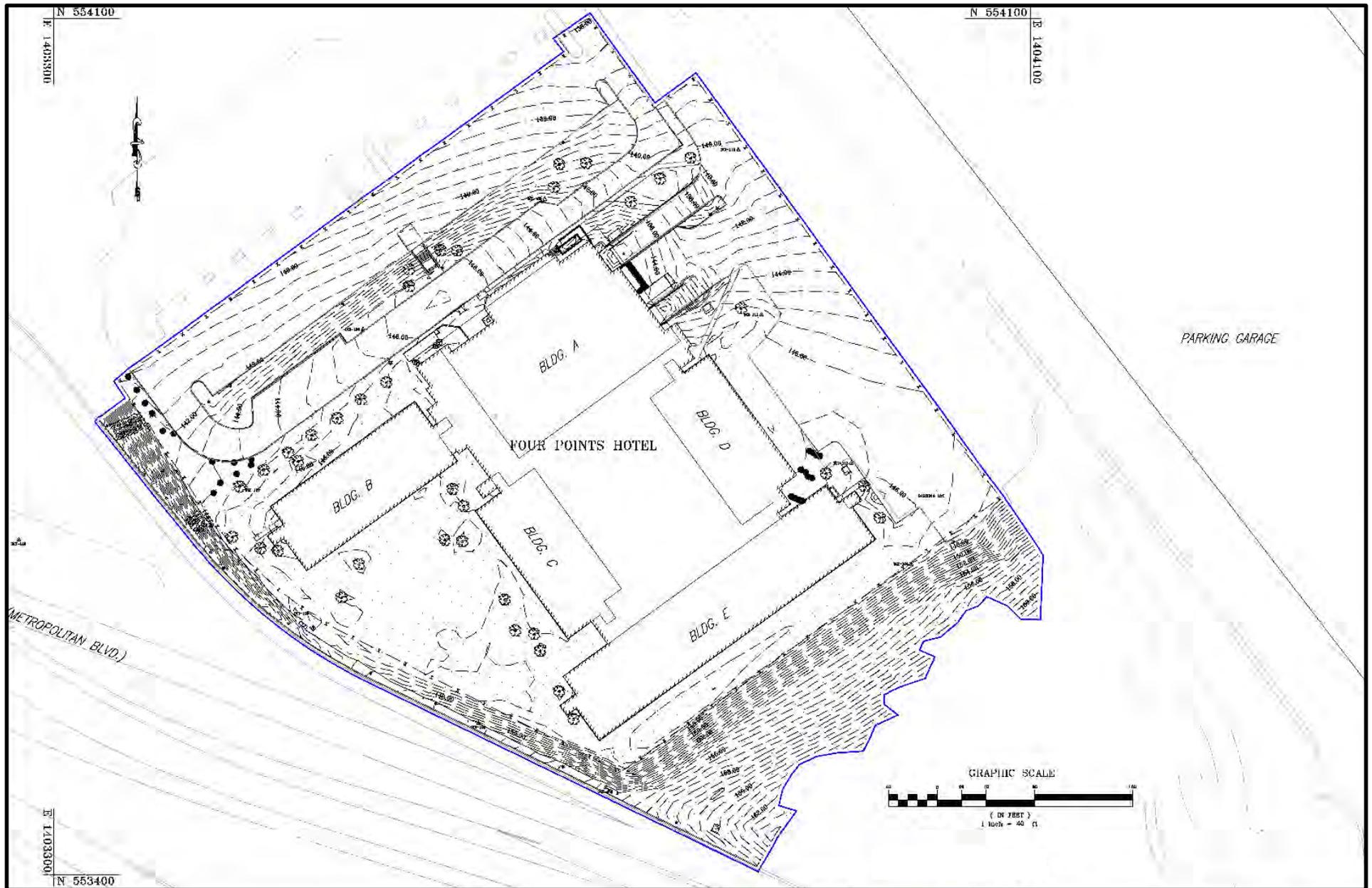
Exhibit 2  
Vicinity Map



0 750 1,500 3,000 Feet

Source: BWI ALP (August 2012)

# BWI Marshall Four Points Sheraton Hotel Demolition Environmental Assessment

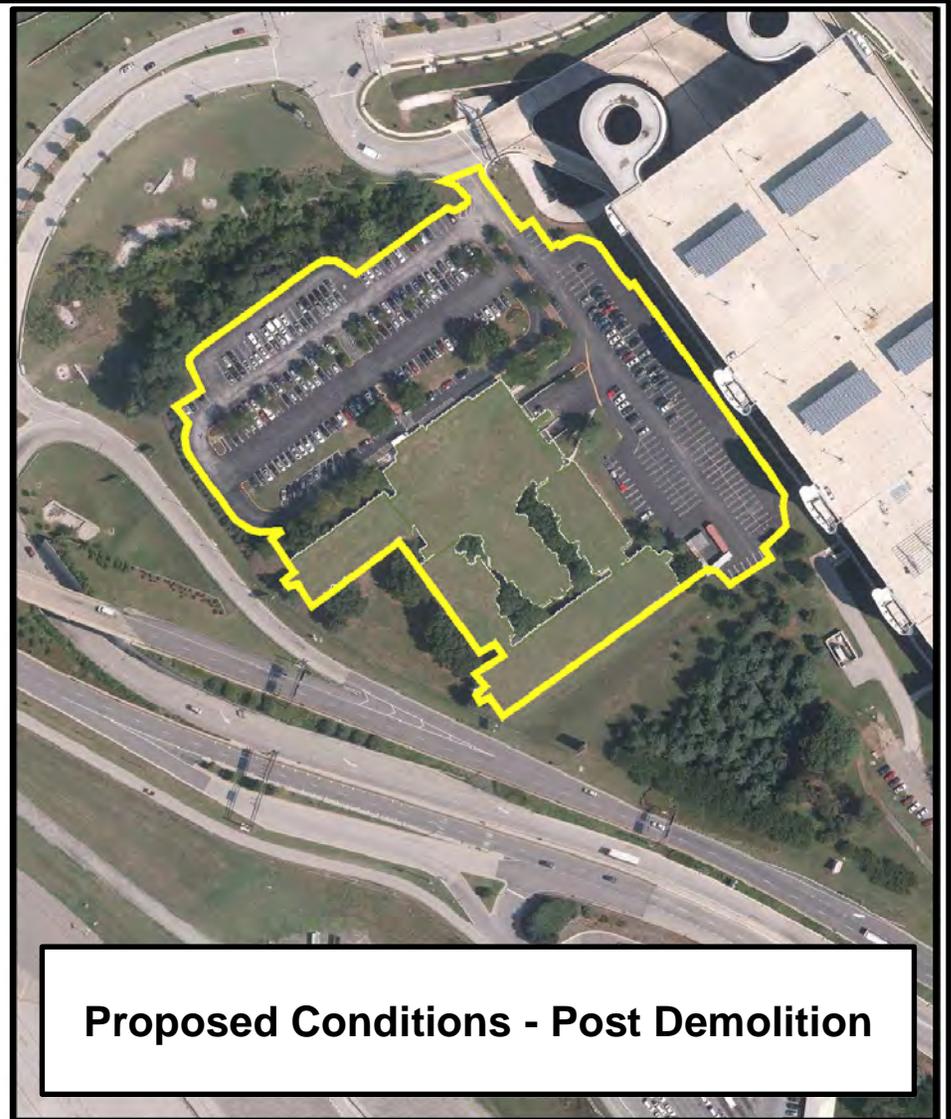


## LEGEND

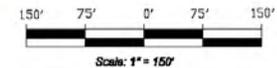
— Survey Limits

Exhibit 3  
Survey Limits





**ALP Pen-and-Ink Request (December 2013)**



**LEGEND**

— Site Location

Exhibit 4  
Proposed Action



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1, and Exhibits 2 and 3 provide an overview of the project location in relation to the airport vicinity and the project site, respectively.

The project site is surrounded by airport-related land uses and roadways in a commercial/ industrial area of the airport. The project site is bordered to the north by Terminal Road and a surface parking lot (Express Parking and Cell Phone Lot), beyond which is Aviation Boulevard. A parking garage (Daily Garage) is located immediately to the east of the project site, beyond which is Southwest Airlines' Fuel Tank Farm, previously BWI Fuel Farm (1001 Air Cargo Drive). To the south and the west of the project site is Interstate 195, beyond which is an airport runway. The project site is identified as Retail land use in the 2003 BWI/Linthicum Small Area Plan.

The Proposed Action is located completely within the landside area of the Airport and there are no sensitive populations within the project area. The nearest residential areas, schools, daycare centers, or places of public assembly are located off of BWI Marshall property, approximately ¾- miles or more from the project area.

Anne Arundel County, Maryland is located within a coastal zone, therefore MAA is required to comply with the regulations set forth and administered by the Maryland Department of the Environment (MDE) and Maryland Department of Natural Resources (MDNR) for this project, as discussed in *Section (C) Coastal Resources*. Anne Arundel County is also presently designated by the Environmental Protection Agency (EPA) as nonattainment for the pollutants of ozone (O<sub>3</sub>) and particulate matter equal to or less than 2.5 micrometers (fine particulates or PM<sub>2.5</sub>). Therefore, the EPA's General Conformity Rule applies to the Proposed Action and an air quality analysis was prepared and is presented in *Section (A) Air Quality*.

There are no nearby water bodies, publicly-owned and used parks, recreational areas, wildlife or waterfowl refuges, federally- or state-listed threatened or endangered species or critical habitats, wetlands, floodplains, or cultural resources on or within the immediate vicinity of the project site.

**5. Alternatives to the Project: Describe any other reasonable actions that may feasibly substitute for the proposed project, and include a description of the “No Action” alternative. If there are no feasible or reasonable alternatives to the proposed project, explain why** (attach alternatives drawings as applicable):

Proposed Action Alternative

The Proposed Action Alternative includes the demolition and removal of all five hotel building structures and the outdoor swimming pool, followed by grading and seeding of the disturbed areas. The existing paved roadways and parking areas serving the hotel site will remain.

No changes to roadways or surface transportation are included as part of the Proposed Action Alternative; however, due to the expense of pavement removal and the potential use of the hotel's parking lot in the future, the associated parking area will not be demolished. Access to the parking area will remain unchanged. The short term use of the parking area has not been decided; however possible options include a cell phone parking lot or a bus or taxi staging area.

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A perimeter security fence with appropriate fire rescue vehicle access will be installed on the site during and after the hotel's demolition.

The Proposed Action Alternative survey limits and a graphic rendering of the Proposed Action are depicted on Exhibits 3 and 4, respectively.

#### No Action Alternative

Under the No Action Alternative, no demolition would occur at the project site and the hotel would remain in its current condition, to include the five buildings and outdoor swimming pool. As a result, the vacant buildings and outdoor pool would remain a liability for the MAA and a safety risk to the public. In order to keep the hotel from becoming a visual eyesore in the area, the MAA would have to continue devoting money and resources into securing and maintaining the hotel.

The No Action Alternative does not meet the purpose and need described in *Section 3, Project Purpose and Need*.

#### No Additional Alternatives - Explanation

When the BWI Inn Associates D/B/A Sheraton International Hotel lease was not renewed by the hotel, MAA initially tried to procure another hotel operator, but was not successful (likely due to the age and condition of the hotel and the investment needed to renovate and upgrade the hotel to sustain a competitive hotel operation). Subsequently, MAA completed a study to identify alternative (non-hotel) uses for the 48-year old hotel, however none were deemed to be viable options. Without the prospect of leasing the hotel to another tenant, the expenditure of MAA resources necessary to renovate the building or retrofit the building to another use for the airport was not considered feasible or reasonable. Furthermore, demolition of the hotel in the 2021-2025 timeframe was the MAA's intention (as shown on the August 2012 ALP). However, MAA now desires the hotel demolition be completed in 2014 given the vacant project site, and has already received FY 2014 State funding to accomplish the demolition work.

Due to the reasons above and because there are no unresolved conflicts concerning alternative uses of available resources, the alternatives for the project are limited to the Proposed Action and No Action alternatives.

**6. Environmental Consequences – Special Impact Categories (refer to the Instructions page and corresponding sections in Appendix A of 1050.1E and the Airports Desk Reference for more information and direction. The analysis under each section must comply with the requirements and significance thresholds as described in the Desk Reference).**

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**(A) AIR QUALITY** (Please note this analysis must meet requirements for both NEPA review and Clean Air Act (CAA) requirements).

**Clean Air Act**

(a) Is the proposed project located in a nonattainment or maintenance area for the National Ambient Air Quality Standards (NAAQS) established under the Clean Air Act and does it result in direct emissions (including construction emissions)?(If **Yes**, go to (b), **No**, go to the NEPA section below.

The project site is located in Anne Arundel County in Maryland, which is presently designated by the EPA as nonattainment for the pollutants of ozone (O<sub>3</sub>) and particulate matter equal to or less than 2.5 micrometers (fine particulates or PM<sub>2.5</sub>). Therefore, the EPA's General Conformity Rule applies to the Proposed Action and an air quality analysis was prepared. Emissions of nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOC) – the two primary precursors to O<sub>3</sub> formation – as well as PM<sub>2.5</sub> are the focus of the air quality analysis. For this Proposed Action, the applicable *de minimis* thresholds are 100 tons per year of VOC, NO<sub>x</sub>, and PM<sub>2.5</sub>. For completeness, the emissions inventory also included carbon monoxide (CO), particulate matter equal to or less than 10 micrometers (coarse particulates or PM<sub>10</sub>), and sulfur dioxide (SO<sub>2</sub>).

(b) Is the proposed project an “exempted action,” under the General Conformity Rule or Presumed to Conform (See FRN, vol.72 no. 145, pg 41565)? (If **Yes**, cite exemption and go to NEPA section below; **No**, go to (c)).

No, the proposed project is not an “exempted action” under the General Conformity Rule.

(c) Would the proposed project result in a net total of direct and indirect emissions that exceed the threshold levels of the regulated air pollutants for which the project area is in non-attainment or maintenance? (Attach emissions inventory). (If **Yes**, consult with ADO).

Construction emissions associated with the Proposed Action are presented and compared to *de minimis* thresholds, where applicable, in **Table 1**. Construction emissions include combustion exhaust from equipment and fugitive dust from soil disturbance and demolition activities. Construction is expected to occur during an 18 week period in 2014. As shown, the maximum annual emissions are estimated to be 1.1 tons of CO, 0.9 tons of NO<sub>x</sub>, 7.9 tons of PM<sub>10</sub>, 0.9 tons of PM<sub>2.5</sub>, less than 0.1 ton of SO<sub>2</sub>, and 0.1 ton of VOC. Importantly, the maximum annual emissions of VOC, NO<sub>x</sub>, and PM<sub>2.5</sub> do not exceed *de minimis* thresholds, and hence, construction emissions conform to the applicable State Implementation Plan (SIP) designed to attain the NAAQS. ***Attachment 1: Air Quality Emissions Inventory and Construction Assumptions*** contains the assumptions and methodologies used for the construction emissions inventory.

**Table 1**  
**Project-Related Construction Emissions Inventory**

Pollutant	2014	<i>de minimis</i>	Conforms?
Carbon Monoxide (CO)	1.11	-	Yes
Nitrogen Oxides (NO <sub>x</sub> )	0.87	100	Yes
Particulate Matter 10 micrometers (PM <sub>10</sub> )	7.93	-	Yes
Particulate Matter 2.5 micrometers (PM <sub>2.5</sub> )	0.85	100	Yes
Sulfur Dioxide (SO <sub>2</sub> )	<0.01	-	Yes
Volatile Organic Compounds (VOC)	0.07	100	Yes

Source: United States Environmental Protection Agency NONROAD2008a and United States Environmental Protection Agency Motor Vehicle Emission Simulator MOVES2010b.

**NEPA**

(a) Is the airport’s activity levels below the FAA thresholds for requiring a NAAQS analysis? (If **Yes**, document activity levels and go to Item 2, **No**, go to (b)).

Based on FAA guidance, even though airport activity levels exceed FAA thresholds, because the project’s direct emissions are below *de minimis* thresholds and there is no consequent increase in the volume of aircraft operations, a NAAQS assessment is not necessary.

(b) Do pollutant concentrations exceed NAAQS thresholds? (Attach emissions inventory).

No. See *Attachment 1: Air Quality Emissions Inventory and Construction Assumptions*.

(c) Is an air quality analysis needed with regard to state indirect source review?

No. Indirect source review requirements are state specific, and Maryland is not one of the states that require such reviews.

**(B) BIOTIC RESOURCES**

Describe the potential of the proposed project to directly or indirectly impact plant communities and/or the displacement of wildlife. (This answer should also reference Section S, Water Quality, if jurisdictional water bodies are present).

There is no known potential to directly or indirectly impact plant communities and/or to displace wildlife due to the Proposed Action; the Proposed Action would demolish five vacant buildings and an outdoor pool on the project site. Although there is not substantial vegetation on the project site, the MAA intends to preserve the trees and landscaping that currently exist. The Proposed Action includes the grading and seeding of the disturbed areas.

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## **(C) COASTAL RESOURCES**

(a) Would the proposed project occur in a coastal zone, or affect the use of a coastal resource, as defined by your state's Coastal Zone Management Plan (CZMP)? Explain.

Yes, BWI Marshall is in Anne Arundel County, which is part of Maryland's Coastal Zone. As such, MAA is required to comply with the regulations set forth and administered by MDE and MDNR. However the proposed project would not affect the use of a coastal resource and would not impact wetlands, waterways or forest, as defined by the Maryland CZMP.

(b) If **Yes**, is the project consistent with the State's CZMP? (If applicable, attach the sponsor's consistency certification and the state's concurrence of that certification).

Yes. In correspondence dated February 6, 2014 the Federal Consistency Coordinator stated, "the proposed demolition is consistent with the Maryland Coastal Zone Management Program, as required by Section 307 of the CZMA." See *Attachment 2: Agency Consultation* for correspondence with the Federal Consistency Coordinator.

(c) Is the location of the proposed project within the Coastal Barrier Resources System? (If **Yes**, and the project would receive federal funding, coordinate with the FWS and attach record of consultation).

No.

## **(D) COMPATIBLE LAND USE**

(a) Would the proposed project result in other (besides noise) impacts that have land use ramifications, such as disruption of communities, relocation of residences or businesses, or impact natural resource areas? Explain.

No. The project site is entirely within the Terminal core area of the Airport, surrounded by airport-related uses (a parking garage and roadways). The project would not disrupt communities or require relocation of residences or businesses, or impact any natural resource areas.

(b) Would the proposed project be located near or create a wildlife hazard as defined in FAA Advisory Circular 150/5200-33, "Wildlife Hazards On and Near Airports"? Explain.

No. Due to the project site location (within the BWI Marshall Air Operations Area [AOA boundary]), the project site will be subject to wildlife hazard considerations during demolition and the subsequent grading and seeding of the disturbed areas. In accordance with the *BWI Wildlife Hazard Management Plan* (WHMP) (Updated May 2013), habitat management control efforts will be implemented to actively reduce wildlife attractions to the project site. Once the site is graded and seeded, vegetation management practices will be adhered to as discussed in the WHMP to minimize bird and wildlife hazards.

## **(E) CONSTRUCTION IMPACTS**

Would construction of the proposed project increase ambient noise levels due to equipment operation; degrade local air quality due to dust, equipment exhausts and burning debris;

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deteriorate water quality when erosion and pollutant runoff occur; and/or disrupt off-site and local traffic patterns? Explain.

The demolition would result in temporary impacts to ambient noise levels, air quality, and potentially localized water quality if runoff occurs.

Noise impacts during construction are expected, but noise impacts would be localized in the vicinity of the construction site. Construction equipment and vehicles would create localized increases in noise levels, but these temporary noise impacts would not disrupt normal airport operations.

As shown in *Section (A) Air Quality*, the maximum annual construction emissions are estimated to be 1.1 tons of CO, 0.9 tons of NO<sub>x</sub>, 7.9 tons of PM<sub>10</sub>, 0.9 tons of PM<sub>2.5</sub>, less than 0.1 ton of SO<sub>2</sub>, and 0.1 ton of VOC. Importantly, the maximum annual emissions of VOC, NO<sub>x</sub>, and PM<sub>2.5</sub> do not exceed *de minimis* thresholds, and hence, construction emissions conform to the applicable SIP designed to attain the NAAQS.

Although construction-related emissions associated with the Proposed Action are considered to be *de minimis* under the CAA General Conformity Rule and are temporary in duration (i.e., 18 weeks), these emissions can be further reduced by employing the following measures. Importantly, the fugitive dust calculations prepared in support of this air quality analysis account for implementation of these measures as they relate to dust control (i.e., periodic watering):

- Reduction of exposed erodible surface area through appropriate materials and equipment staging procedures;
- Cover of exposed surface areas with pavement or vegetation in an expeditious manner;
- Reduction of equipment idling times;
- Ensure contractor knowledge of appropriate fugitive dust and equipment exhaust controls;
- Soil and stock-pile stabilization via cover or periodic watering;
- Use of low- or zero-emissions equipment;
- Use of covered haul trucks and conveyors during materials transportation;
- Reduction of electrical generator usage, wherever possible;
- Suspension of construction activities during high-wind conditions;
- Creation of dust, odor and nuisance reporting system;
- Daily watering of exposed surfaces and demolition activities;
- Reduction of vehicles speeds onsite; and
- Prohibition of open burning for waste disposal.

If uncontrolled, construction activities have the potential to cause erosion and sedimentation that can impact water quality. Short-term construction impacts would be minimized by strict adherence to erosion and sediment control procedures.

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Overall, the Proposed Action is expected to create minor and temporary impacts during construction at the project site and in the surrounding area. These impacts would be short-term in nature, lasting for the duration of construction activities. Temporary contractor staging areas would be required throughout the demolition process to store construction equipment and materials. All impacts associated with construction of the Proposed Action would be temporary and below significance thresholds. Permit requirements will be adhered to and will minimize or mitigate any potential temporary impacts due to construction.

#### **(F) SECTION 4(f) RESOURCES**

Does the proposed project have an impact on any publicly owned land from a public park, recreation area, or wildlife or waterfowl refuge of national, state, or local significance, or an historic site of national, state, or local significance? (If **Yes**, contact FAA, contact appropriate agency and attach record of consultation).

No. The project site is on BWI Marshall property and would not impact any Section 4(f) resources. MAA received concurrence from the Maryland Historic Trust (MHT) dated 3/12/14 confirming that there are no historic properties affected by the Proposed Action. See *Attachment 2: Agency Consultation*.

#### **(G) ENDANGERED AND THREATENED SPECIES**

(a) Would the proposed project impact any federally or state-listed or proposed, endangered, or threatened species (ESA) of flora and fauna, or impact critical habitat? (Attach record of consultation with federal and state agencies as appropriate).

No. Activities from the implementation of the Proposed Action would occur within the built-up Terminal core area of the Airport, which is well out of range of any threatened or endangered species. The Proposed Action would not have an impact on any known or suspected threatened or endangered species or critical habitat. The U.S. Fish and Wildlife Service Information, Planning, and Conservation System (IPaC) tool was used to confirm that there are no State or Federal records for rare, threatened or endangered species in the vicinity of the project site.

(b) Would the proposed project affect species protected under the Migratory Bird Act? (If **Yes**, contact FAA).

No.

#### **(H) ENERGY SUPPLIES, NATURAL RESOURCES AND SUSTAINABLE DESIGN**

What effect would the proposed project have on energy or other natural resource consumption? (Attach record of consultations with local public utilities or suppliers if appropriate)

The Proposed Action would not require any activities that would have a measurable effect on local supplies of energy or natural resources. The Proposed Action would require fuel for the construction vehicles and equipment during the demolition of the project site and grading and seeding of the disturbed areas; however, the anticipated energy consumption required for the Proposed Action would not amount to a significant percent of total airport energy use, and current energy supplies at the Airport could meet the additional demand.

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The Proposed Action would not involve the use of any unusual or scarce materials and would not cause a demand for the use of any unusual natural resource or the use of any resource that is in short supply. There are no known deposits of valuable natural resources located on or in the vicinity of the project site that would be affected by the Proposed Action.

### *Sustainable Design*

The Proposed Action does not include design or construction of new infrastructure; therefore sustainable design was not considered.

### **(I) ENVIRONMENTAL JUSTICE**

Would the proposed project have a disproportionate impact on minority and/or low-income communities? Consider human health, social, economic, and environmental issues in your evaluation. Explain.

The Proposed Action would occur on Airport property within the Terminal core area and would not impact the economic development or health and safety of the communities near the Airport. No neighborhoods or populations would be impacted by the Proposed Action and no disproportionately high and adverse impacts on minority and low-income populations with respect to human health and environment would occur.

### **(J) FARMLANDS**

Does the project involve acquisition of farmland, or use of farmland, that would be converted to non-agricultural use and is protected by the Federal Farmland Protection Policy Act (FPPA)? (If **Yes**, attach record of coordination with the Natural Resources Conservation Service (NRCS), including form AD-1006.)

No.

### **(K) FLOODPLAINS**

(a) Would the proposed project be located in, or would it encroach upon, any 100-year floodplains, as designated by the Federal Emergency Management Agency (FEMA)?

No.

(b) If Yes, attach the corresponding FEMA Flood Insurance Rate Map (FIRM) and describe the measures to be taken to comply with Executive Order 11988.

Not Applicable.

### **(L) HAZARDOUS MATERIALS**

Would the proposed project involve the use of land that may contain hazardous materials or cause potential contamination from hazardous materials? (If **Yes**, attach record of consultation with appropriate agencies). Explain.

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The hotel complex currently contains hazardous materials, including asbestos-containing materials (ACM), leadbased paint (LBP), Polychlorinated biphenyls (PCB) light ballasts/electrical equipment, mercury-containing lighting/thermostats/devices and stored chemicals. No aboveground or visual evidence of underground storage tanks were observed on the property. The three federal statutes most applicable are the Resource Conservation and Recovery Act (RCRA), as amended by the Federal Facilities Compliance Act of 1992, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, and the Toxic Substances Control Act (TSCA). RCRA governs the generation, treatment, storage, and disposal of hazardous wastes. CERCLA provides remedies for uncontrolled and abandoned hazardous waste sites. In Maryland, the regulation of toxic substances falls under the purview of the TSCA (under the EPA) and by MDE. In accordance with these federal statutes, federal regulations under 29 CFR Parts 1910 and 1926, 40 CFR Parts 61 and 761, 49 CFR Parts 171-173, and Code of Maryland Regulations (COMAR) 26.11.21 and 26.13.10, remediation of all hazardous materials will be conducted prior to demolition of the hotel buildings; therefore no release or exposure of hazardous materials is anticipated. The MDE also recommends that any contract specifying “lead paint abatement” must comply with COMAR 26.16.01 - Accreditation and Training for Lead Paint Abatement Services.

Contract specification reports have been prepared for ACM, LBP and PCB abatement specifying the procedures that will be used and adhered to for the proper removal of these materials. Tasks include: (1) pre-abatement activities including inspection, notifications, permits, submittals and approvals, work area preparations (removal of equipment from the work area), emergency arrangements, and standard operating procedures; (2) Abatement activities including removal and disposal of hazardous materials, contaminated waste, recordkeeping, security, and inspection and monitoring; and (3) Cleaning, encapsulation, and decontaminating activities including final inspection, testing, and certification. The Contractor, job supervisors, foremen, and abatement workers must be certified and licensed as required by the State of Maryland. The remediation of hazardous materials is expected to commence in April 2014 and will take approximately six weeks to complete.

In June of 2012, a Phase I Environmental Site Assessment (ESA) was performed by an Environmental Professional (EP) as defined in 40 CFR §312.10 in conformance with the scope and limitations of ASTM Practice E 1527-05. The ESA was conducted in advance of the tenant’s lease expiration and reverting of the title to MAA, in order to provide the MAA with information for use in evaluating recognized environmental conditions (RECs) associated with the property. The *Phase I Environmental Site Assessment, Four Points by Sheraton, 1 Scott Drive, Baltimore, Maryland* is included as Attachment 3A in **Attachment 3: Hazardous Materials Reports**.

In support of the identification and removal/remediation effort, MAA contracted to develop a Hazardous Materials Report and specifications in support of the planned demolition of the Sheraton Four Points Hotel to serve as a guide and summary of known hazardous materials. Information found in this report is based on observations and sampling conducted during a Hazardous Materials (HAZMATs) intrusive survey that took place from January 13 through January 17, 2014. The HAZMAT survey, associated report and specifications were conducted and developed by accredited health, safety and environmental professionals. The *DRAFT Hazardous Materials Report in Support of the Upcoming Alterations at the Four Points Sheraton Hotel, BWI Airport* (January 2014) is included as Attachment 3B in **Attachment 3: Hazardous Materials Reports**.

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Pollution prevention and control will be conducted in accordance with EO 12088, *Federal Compliance with Pollution Control Standards*. BWI Marshall has developed an *Airport Integrated Contingency Plan (ICP)* and *Spill Prevention, Control and Countermeasure (SPCC) Plan*. The ICP describes the actions that should be taken in the event of a release of hazardous materials or a spill that threatens to enter the stormwater management system. The ICP also includes emergency contacts and reporting procedures. This ICP, and other applicable documents such as tenant-specific plans, should be considered when preparing for hazardous or emergency situations. In addition, a separate SPCC plan has been developed for BWI Marshall, in accordance with regulatory requirements.

**(M) HISTORIC, ARCHITECTURAL, ARCHEOLOGICAL OR CULTURAL PROPERTY**

(a) Describe any impact the proposed project might have on any properties in or eligible for inclusion in the National Register of Historic Places. (Include a record of your consultation and response with the State or Tribal Historic Preservation Officer (S/THPO)).

There would be no impacts to historic, architectural, archeological, or cultural property. In 1996, MAA prepared a Historic Preservation Plan (HPP) with input and coordination from MHT that provided an overview of the history and prehistory of BWI Marshall, including an inventory of all recorded archeological and historical resources located on Airport property as well as a planning manual/action plan component. Part of the HPP planning manual/action plan details the coordination required for project review and development. Specifically, for projects that fall within areas designated in the HPP as previously evaluated/no additional study is required, MAA is able to move forward with the proposed project without any further coordination with MHT.

The project site is located in a “previously evaluated/no additional study required” area of the Airport. The hotel buildings are not 50 years old and are not exceptionally important to be considered eligible for listing. Additionally the hotel demolition is not in a location that could affect other nearby historic, architectural, archaeological or cultural resources. The MAA received concurrence from the MHT dated 3/12/14 confirming that no further coordination or historic preservation review is warranted for the proposed demolition of the former Four Points Hotel at BWI Marshall.” Furthermore, in response to the Draft EA, the MHT commented that they had “determined that the project will have ‘no effect’ on historic properties and that the federal and/or State historic preservation requirements have been met.” See *Attachment 2: Agency Consultation*.

(b) Describe any impacts to archeological resources as a result of the proposed project. (Include a record of consultation with persons or organizations with relevant expertise, including the S/THPO, if applicable).

No impacts. Refer to (M)(a) above.

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## **(N) INDUCED SOCIOECONOMIC IMPACTS**

Would the proposed project cause induced, or secondary, socioeconomic impacts to surrounding communities, such as change business and economic activity in a community; impact public service demands; induce shifts in population movement and growth, etc.? Explain.

The Proposed Action would occur on Airport property within the Terminal core area and would not cause any impacts to surrounding communities or shift any business or economic activity or population movement or shifts in a community. The hotel buildings are currently vacant and are no longer functioning as a hotel operation or as any business.

## **(O) LIGHT EMISSIONS AND VISUAL EFFECTS**

Would the proposed project have the potential for airport-related lighting impacts on nearby residents? Explain.

No impacts to light emissions would result from implementing the Proposed Action. Any work area lighting needed during demolition would be temporary and minimal in comparison to the existing light emissions from security lighting and the surrounding highways and local roads that are illuminated by street lights around the Airport property. Therefore, any addition or temporary light during the demolition would not significantly change the light emissions from or within the Airport.

The removal of the hotel buildings and outdoor swimming pool and grading/seeding of the disturbed areas would not detract from the area's visual quality. The hotel is surrounded by a parking garage, landscaping (grass and trees), and roadways. The change in visual appearance would be an improvement over the vacant hotel, which consists of an aging building complex and is not architecturally notable or significant. Additionally, because the hotel is no longer occupied, the site has the potential to have a negative visual impact on the surrounding area if the hotel is not removed.

The area surrounding BWI Marshall is an urban landscape and there are no nearby residents that would be impacted by any temporary work area light emissions or the absence of the hotel once demolition is completed.

## **(P) NOISE**

Will the project, when compared to the No Action alternative for the same timeframe, cause noise sensitive areas located at or above DNL 65 dB to experience a noise increase of at least DNL 1.5 dB? (Use AEM as a screening tool and INM as appropriate. See Airports Desk Reference, Chapter 17, for further guidance).

No. The Proposed Action would not increase aircraft operations or surface traffic. Construction equipment and vehicles would create localized increases in noise levels, but these temporary noise impacts would not disrupt normal airport operations. All proposed construction activities would take place inside the airport boundary.

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## **(Q) SOCIAL IMPACTS**

Would the proposed project cause an alteration in surface traffic patterns, or cause a noticeable increase in surface traffic congestion or decrease in Level of Service?

The existing roadways and parking areas serving the hotel site would remain in their existing condition; no changes to traffic patterns or increases in surface traffic congestion are anticipated as a result of the Proposed Action.

## **(R) SOLID WASTE**

Would the operation and/or construction of the project generate significant amounts of solid waste? If **Yes**, are local disposal facilities capable of handling the additional volumes of waste resulting from the project? Explain.

MAA's non-hazardous solid wastes are removed for disposal by licensed and approved private contractors. In accordance with COMAR 26.04.07, BWI Marshall uses contracted permitted commercial waste haulers to dispose of wastes and ensure wastes are disposed of in properly permitted facilities. Additionally, MAA uses best management practices (BMPs) for waste management and is involved in waste minimization and recycling programs at BWI Marshall, which requires special handling of materials and reporting. As part of this, MAA will recycle and reuse salvaged building materials as feasible with the use of segregated dumpsters in order to minimize construction and demolition debris waste from entering the landfills. In accordance with MDE recommendations, any solid waste including demolition and land clearing debris will be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible.

MAA will advise the selected contractor to consider Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, during implementation of the Proposed Action. The Order sets forth Federal energy requirements in several areas and states that Federal agencies should enhance efforts toward sustainable buildings and communities.

## **(S) WATER QUALITY**

(a) Does the proposed project have the potential to impact water quality, including ground water, surface water bodies, and public water supply system or federal, state or tribal water quality standards? (If **Yes**, contact appropriate agency and include record of consultation).

Short-term impacts to water quality during the demolition, grading and seeding involved in the Proposed Action would be minimized by strict adherence to erosion and sediment control procedures. An Erosion and Sediment Control Plan would be developed in accordance with MDE guidelines, and implemented to avoid and/or minimize erosion and sedimentation. Appropriate drainage, infiltration, and sediment control measures would be planned and implemented to minimize disturbance to the area and reduce the risk of contamination to water resources.

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In the long term, the Proposed Action would result in a decrease in impervious cover at the project site, which would reduce stormwater runoff. Any treatment requirements at the project site could therefore be met through a combination of stormwater management practices and impervious removal and no significant water quality impacts are anticipated as a result of the Proposed Action.

(b) Is the project to be located over a designated Sole Source Aquifer? (If **Yes**, attach record of consultation with EPA).

No.

### **(T) WETLANDS**

(a) Does the proposed project involve federal or state regulated or non-jurisdictional wetlands? (Contact USFWS or state agency if protected resources are affected) (Wetlands must be delineated using methods in the US Army Corps of Engineers 1987 Wetland Delineation Manual. Delineations must be performed by a person certified in wetlands delineation).

No. There are no federal or state regulated wetlands or non-jurisdictional wetlands in the area of the project site.

(b) If yes, does the project qualify for an Army Corps of Engineers General permit? (Document coordination with the Corps).

Not applicable.

### **(U) WILD AND SCENIC RIVERS**

Would the proposed project affect a river segment that is listed in the Wild and Scenic River System or National Rivers Inventory? (If **Yes**, coordinate with the jurisdictional agency and attach record of consultation).

No.

### **(V) CUMULATIVE IMPACTS**

Discuss impacts from past, present, and reasonably foreseeable future projects both on and off the airport. Would the proposed project produce a cumulative effect on any of the environmental impact categories above? Consider projects that are connected and may have common timing and/or location. For purposes of this Form, generally use 3 years for past projects and 5 years for future foreseeable projects.

A review of several information sources was conducted to determine past, present, and reasonably foreseeable development actions at BWI Marshall and the surrounding area. The April 2012 *Final EA for Proposed Airport Improvements at BWI Marshall* contains an analysis of cumulative impacts that remains applicable to the Proposed Action in this EA. The information sources used in the *Final EA* included the BWI Marshall Airport Master Plan (2010), BWI Marshall ALP, BWI Marshall 2011 Construction Update, and Maryland's FY 2011-2016 Consolidated Transportation Program.

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The analysis of cumulative impacts in this EA considers the potential impacts of the Proposed Action and other development actions, both on and off the airport, that are related in terms of time (three years for past projects and five years for future foreseeable projects) or proximity.

**On-Airport Projects:**

MAA is responsible for the planning, design and construction of various airport projects on BWI Marshall property intended to improve the functionality of the Airport as well as maintain its economic vitality. The BWI Marshall Airport Master Plan, which addresses the long-term facility needs of the airport through 2030 and beyond, is categorized by Airfield projects, Terminal projects, Support facilities and Private investments. **Table 2**, modified from the *Final EA for Proposed Airport Improvements at BWI Marshall*, contains a list of recently completed, current and future projects that occur between 2011 and 2020, in order to qualitatively assess potential cumulative impacts. The table was updated with more recent information available in the 2011 Master Plan Update and the August 2012 ALP.

**Table 2**  
**BWI Marshall On-Airport Cumulative Projects**

<b>Time</b>	<b>Project Name (Type of Project*)</b>	<b>Year</b>
<b>Recently Completed (3 years)</b>	Reconstruct the C and D aprons (A)	2009 - 2011
	ASDE-X Installations	2010 - 2011
	Consolidated Rental Car Facility Improvements (S)	2010 - 2011
	Gate G Improvements (S)	2010 - 2011
	Ramp Paving Project (A)	2011
	Enclosures for US Airways and American Airlines (T)	2011
	Apron Reconstruction (A)	2011
	Comprehensive Interior/Exterior Modifications (T)	2011
	Comprehensive Paving Improvements (A)	2011 - 2014
	Noise Zone Land Acquisition Program (M)	2012 - 2013
Hazardous Remediation at Sheraton Hotel Complex	April 2014	
<b>Current</b>	Homeowner Assistance Program (M)	2012 - 2016
<b>Future (5 years)</b>	Hotel and Parking (T)	2015**
	Runway 15L-33R FAA Standards Compliance (A)	2015**
	Expansion of CUP (S)	2015**
	On-Airport Roadway Improvements (S)	2015**
	Relocation of Electrical vault (S)	2016
	Development of a new Northrop Grumman Hangar (P)	2016
	Snow Removal Equipment Storage Facility (S)	2016
	Co-Generation Facility (S)	2016-2020**
	Connecting Terminal Taxiways and Apron Fill-in (A)	2017
	Construction of a second Fixed Based Operator (S)	2017
	ARFF Expansion (S)	2017
	Demolition of Commuter Concourse for "Remain Overnight" (RON) Aircraft Parking (A)	2018
	Construction of Concourse E RON Pad (A)	2019
New Fire Training Facility (S)	2019	

Source: *Final Environmental Assessment: Proposed Airport Improvements at BWI Marshall*, April 2012, Table 4.16-1. (MAA Capital Program FY 2011-2016; BWI Marshall ALP Narrative, 2010; BWI Marshall Construction Update, April 12, 2011)

**Notes:**

\*Type of Project: (A) – Airfield project; (T) – Terminal area project; (S) – Support facility project; (P) – Private investment project; (M) – MAA project

\*\*Indicates Project Name and/or Year updated based on ALP Update (August 2012). Discussion is ongoing.

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The demolition of the hotel is identified on the BWI Marshall ALP as a project anticipated to occur during the 2021-2025 timeframe. However, as stated previously, because the vacant hotel buildings and outdoor swimming pool are a safety concern and financial liability in their current condition, the MAA desires to demolish the hotel and pool in 2014 and has already received FY 2014 State funding to accomplish this work. The hotel's demolition would not interfere or preclude any identified ALP facilities or developments in the near term or ultimate future.

### **Off-Airport Projects:**

In considering cumulative impacts, off-airport projects that are planned for implementation in proximity to the BWI Marshall spatial boundary were also evaluated. The spatial boundary encompasses portions of Anne Arundel County, Hanover, Linthicum, and Ferndale. Projects discussed in this section are limited to those within the spatial boundary that are included within the approved local growth management plans for the BWI Marshall area. The projects listed are reasonably foreseeable based on state and local planning documentation.

The discussion is presented in terms of significant surface transportation improvements and proposed land development projects. To identify major transportation and development projects for the assessment of cumulative impacts, a variety of information sources were reviewed. The Anne Arundel County General Development Plan, BWI/Linthicum Small Area Plan, Baltimore Metropolitan Council Transportation Outlook, Maryland's FY 2011-2016 Consolidated Transportation Program and the Baltimore Region Transportation Improvement Program 2011-2014 were reviewed to identify projects that were included for capital improvement funding.

### **Surface Transportation**

- MD 295 (i.e., Baltimore Washington Parkway) -- currently being widened from four lanes to six lanes from I-195 northward to I-695.
- BWI Marshall Airport Rail Station – MTA has proposed station improvements and a Fourth Track Project. This includes construction of a new platform, improvements to the current station with possible multi-level transit oriented development, the addition of nine miles of fourth track along the Northeast Corridor Line and modifications to an interlocking just north of the West Baltimore MARC station. The general project area is defined as a 500-foot linear corridor centered on the existing rail line between the Odenton Station and Halethorpe Station, for a distance of approximately 10 miles. It is anticipated that all of the improvements would be made within the existing railroad and station rights-of-way.

### **Land Development**

- BWI/Linthicum Small Area Plan – Proposed land use changes and land development projects in various phases, including:
  - Airport Square Business Park in Linthicum is a business park along West Nursery Road that is planned for Employment Mixed land use to create more live/work opportunities along this employment corridor.
  - The Ridge Road Area of Hanover, located near the BWI Amtrak Station, is designated for Transit Mixed Use to allow office, retail, and high density residential uses near major employers around the airport and near AMTRAK and MARC transit/multi-modal opportunities.

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- Anne Arundel County General Development Plan, 2009:
    - Developers have been interested in pursuing an “aerotropolis” concept that would incorporate airport- oriented uses, employment, hospitality, entertainment and residential uses in a transit-oriented development. The development would be planned within the area bordered by MD-295, Hanover Road, and Aviation Boulevard.

### **Potential Cumulative Impacts:**

The following is a qualitative assessment of impact categories in which the potential for cumulative impact associated with the projects described previously, when considered along with the Proposed Action.

#### Hazardous Materials

The remediation of hazardous materials at the project site (hotel buildings), as discussed in *Section (L) Hazardous Materials*, is expected to occur in April 2014 (past project). Because there are no impacts to hazardous materials as a result of the Proposed Action (all hazardous materials will have been remediated), the hazardous materials remediation project, when combined with the Proposed Action, will not result in cumulative impacts. Therefore no cumulative impacts would be associated with hazardous materials as a result of the Proposed Action.

#### Construction

Overall, the construction phase of this project is expected to create minor and temporary impacts at the project site. These impacts would be short-term in nature, lasting for the duration of construction activities (i.e., 18 weeks). Construction of the Proposed Action would result in temporary impacts to ambient noise levels, air quality, and potentially localized water quality.

As shown in *Section (A) Air Quality*, the maximum annual construction emissions do not exceed any applicable *de minimis* thresholds, and hence, construction emissions conform to the applicable SIP designed to attain the NAAQS. These emissions can be further reduced by employing the BMPs and by incorporating the provisions of *FAA Advisory Circular 150/5370 – 10E, Standards for Specifying Construction of Airports*. The construction emissions are minimal and would not cause a significant cumulative impact when combined with any other projects.

If uncontrolled, construction activities have the potential to cause erosion and sedimentation that can impact water quality. Short-term construction impacts would be minimized by strict adherence to erosion and sediment control procedures. It is expected that runoff from construction projects would be minimized by BMPs that would limit sediment transport. Any short term impacts to water quality during construction would be minimal and would not cause a significant cumulative impact when combined with any other projects.

All impacts associated with construction of the Proposed Action would be temporary and below significance thresholds. Permit requirements would be adhered to and would minimize or mitigate any potential temporary impacts due to construction. Temporary pollution controls employed by MAA would include limiting work activities to normal business hours; restricting open burning; wetting of active equipment work areas; covering of all trucks hauling loose

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materials; stabilizing materials, mulch, sandbags, slope drains, sediment checks, artificial covering, and berms.

All applicable local, state, and Federal environmental construction controls would be incorporated into the demolition plans. These controls would help minimize temporary construction impacts related to the Proposed Action and any other projects that may have common timing and/or location. Therefore, significant cumulative impacts are not anticipated as a result of the Proposed Action.

### Summary of Potential Cumulative Impacts

The only project that will have occurred in the immediate vicinity of the project site in the past three years or in the foreseeable future (5 years) is the hazardous materials remediation expected to occur in April 2014. Because there are no impacts to hazardous materials as a result of the Proposed Action (all hazardous materials will have been remediated), the hazardous materials remediation project, when combined with the Proposed Action, will not result in cumulative impacts. There are no other projects that are connected or have common timing with the Proposed Action at this location and there are no projects anticipated to occur in the foreseeable future in the immediate vicinity of the project site.

Resources affected by the cumulative projects, most of which are land development projects, are different than the resources affected by the Proposed Action. The government agency responsible for the development of each cumulative project will be responsible for obtaining all necessary approvals and permits to minimize impacts. Based on the types of cumulative projects planned for the area surrounding BWI Marshall, MAA has concluded that the implementation of the Proposed Action along with the cumulative projects would not result in a significant cumulative impact.

## **7. PERMITS**

List all required permits for the proposed project. Has coordination with the appropriate agency commenced and what is the expected time frame of receiving a permit?

It is anticipated that permits will be needed for erosion and sediment control and demolition. The MAA will obtain all necessary permits and coordinate with the appropriate agencies for the permits needed for the Proposed Action.

## **8. MITIGATION**

Describe those mitigation measures to be taken to avoid creation of significant impacts to a particular resource as a result of the proposed project, and include a discussion of any impacts that cannot be mitigated.

No significant impacts are anticipated as a result of the Proposed Action. However, BMPs would be used to avoid and minimize any potential impacts to the environment during demolition. Proposed measures to ensure minimal environmental impacts are included under the relevant impact category, if applicable.

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## 9. PUBLIC INVOLVEMENT

Describe the public review process and any comments received.

The MAA submitted information regarding the Proposed Action to the MDE Federal Consistency Coordinator and the MHT (Maryland's SHPO). The Federal Consistency Coordinator responded on February 6, 2014 that the proposed demolition is consistent with the Maryland Coastal Zone Management Program (CZMP). The MAA received concurrence from the MHT dated 3/12/14 confirming that no further coordination or historic preservation review is warranted for the proposed demolition of the Sheraton Four Points Hotel at BWI Marshall. See *Attachment 2: Agency Consultation*, for agency correspondence.

The public and agencies were provided an opportunity to review and comment on the Draft Short EA Form during a 30-day review period from June 3 to July 3, 2014. A Notice of Availability (NOA) was published in *The Baltimore Sun* on Tuesday, June 3 and Sunday, June 8, 2014 (Refer to *Attachment 4: Notice of Availability*). Notice of availability of the draft and links to the Draft EA document were also available on the MAA website. Hard copies of the document were made available to the public during the review period at FAA Washington Airports District Office, MAA offices and two public libraries in Anne Arundel County. No comments were received from the public in response to the Draft EA.

The Draft EA was submitted to the Maryland Department of Planning (MDP) State Clearinghouse for distribution to relevant agencies. Review comments were requested via the State Clearinghouse from the Maryland Department(s) of Business and Economic Development, Natural Resources, Transportation, the Environment, Anne Arundel County and the MDP, including the Maryland Historical Trust. The State Clearinghouse forwarded comments received by agencies during the Draft EA review period to the MAA on July 22, 2014. The State Clearinghouse recommendation letter, along with agency recommendations, comments, and consistency determinations are included in *Attachment 2: Agency Consultation*.

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## **10. LIST OF ATTACHMENTS**

- Attachment 1: Air Quality Emissions Inventory and Construction Assumptions
- Attachment 2: Agency Consultation
- Attachment 3: Hazardous Materials Reports
- Attachment 4: Notice of Availability
- Attachment 5: Maryland Environmental Assessment Form

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**Project Title:** Proposed Demolition of Sheraton Four Points Hotel at BWI Marshall  
**Identifier:** BWI

**11. PREPARER CERTIFICATION**

I certify that the information I have provided above is, to the best of my knowledge, correct.

Caroline E. Pinegar  
Signature

April 23, 2014  
Date

Caroline E. Pinegar, A.I.C.P.  
Name

Environmental Project Manager  
Title

MAA Consultant / HNTB Corporation  
Affiliation

703-824-5100  
Phone #

**12. AIRPORT SPONSOR CERTIFICATION**

I certify that the information I have provided above is, to the best of my knowledge, correct. I also recognize and agree that no construction activity, including but not limited to site preparation, demolition, or land disturbance, shall proceed for the above proposed project(s) until FAA issues a final environmental decision for the proposed project(s), and until compliance with all other applicable FAA approval actions (e.g., ALP approval, airspace approval, grant approval) has occurred.

Paul L. Shank  
Signature

April 23, 2014  
Date

Paul L. Shank, P.E., C.M.  
Name

Chief Engineer  
Title

Maryland Aviation Administration  
Affiliation

410-859-7061  
Phone #

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## LIST OF PREPARERS

### MARYLAND AVIATION ADMINISTRATION

<b>Personnel</b>	<b>Title</b>	<b>Years of Experience</b>	<b>Project Responsibilities</b>
Robin Bowie	Manager, Division of Environmental Planning	25	Project Manager

### HNTB

<b>Personnel</b>	<b>Title</b>	<b>Years of Experience</b>	<b>Project Responsibilities</b>
Caroline Pinegar, AICP	Environmental Project Manager	10	Project Manager
Kim Hughes, PE	Manager of Environmental Services	28	Program Manager; Quality Assurance, Quality Control
Kent Miller	Senior GIS Analyst	15	GIS; Graphics
Michael Niez	Project Controls Analyst II	7	Construction Schedule and Assumptions
Ryan Carey, EIT	Environmental Planner	3	Document Development

### KB ENVIRONMENTAL SCIENCES, INC.

<b>Personnel</b>	<b>Title</b>	<b>Years of Experience</b>	<b>Project Responsibilities</b>
Mike Ratte	Senior Air Quality Scientist	25	Air Quality Assessment

## LIST OF AGENCIES AND PERSONS CONSULTED

- Anne Arundel County
- Maryland Department of Business and Economic Development
- Maryland Department of the Environment
- Maryland Department of the Environment, Wetlands and Waterways Program
- Maryland Department of Natural Resources
- Maryland Department of Planning
- Maryland Department of Planning, Maryland Historical Trust
- Maryland Department of Planning, State Clearinghouse
- Maryland Department of Transportation