

MEMORANDUM

TO: Ms. Barbara Solberg
Division Chief
Highway Design Division

ATTN: Ms. Denila Deliallisi
Project Manager
Highway Design Division

FROM: Mr. Donald H. Sparklin
Division Chief
Environmental Planning Division



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Date: 2015.05.15 16:13:24 -0400

DATE: May 15, 2015

RE: Project No.: PG624B21
Project: US 1 College Park Phase 1: College Avenue to University Boulevard (MD 193)
Prince George's County, Maryland
Environmental Reevaluation Consultation

An environmental reevaluation consultation was held with representatives of the Federal Highway Administration (FHWA) on Thursday, January 15, 2015 for *Phase 1: College Avenue to University Boulevard*. This project currently has a production-advertisement date of November 15, 2016.

Meeting attendees included:

Ms. Jeannette Mar	Federal Highway Administration – Maryland Division
Ms. Joy Liang	Federal Highway Administration – Maryland Division
Ms. Keilyn Perez	Federal Highway Administration – Maryland Division
Ms. Allison Grooms	State Highway Administration – Environmental Planning Division
Mr. Dennis Atkins	State Highway Administration – Environmental Planning Division
Mr. Joseph Kresslein	State Highway Administration – Environmental Planning Division
Mr. Donald Sparklin	State Highway Administration – Environmental Planning Division
Mr. Michael P. Sybert	State Highway Administration – Environmental Planning Division
Ms. Deni Deliallisi	State Highway Administration – Highway Design Division

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Project Background

Allison Grooms (co-environmental manager) provided the following background information about the project, supported by information on the project Fact Sheet and attachments.

The US 1 College Park project is located in Prince George's County and extends along US 1 from College Avenue to I-95/I-495 (Capital Beltway) in Prince George's County. This project was initiated to improve safety and traffic operations, while enhancing aesthetics and transit accessibility. A Finding of No Significant Impact (FONSI) was approved by FHWA on July 17, 2005, documenting the selection of Alternative 4: The Four-Lane Divided Alternative. Since transitioning to design the project was broken into the following three design/construction phases for funding reasons: (**See Fact Sheet & Coordination Package**).

- Phase 1: College Avenue to University Boulevard (MD 193)
- Phase 2: University Boulevard (MD 193) to Hollywood Road
- Phase 3: Hollywood Road to I-95/I-495

Phase 1 currently funded for design and Right-of-Way (ROW) acquisition; the other phases are not actively funded. Phase 1 is included in the National Capital Region Transportation Planning Board (TPB) Transportation Improvement Program (TIP) (ID# 3108, 2013-2015). The production-advertisement date for Phase 1 of the project is November 15, 2016, with the construction Notice to Proceed date yet to be determined.

Deni Deliallisi (project manager) presented the existing conditions on US 1, a description of the FONSI Selected Alternate, and the Current Design of US 1 College Park Phase 1.

Existing Conditions

Currently, US 1 within the Phase 1 study limits is a four-lane divided roadway with a raised median and no shoulders from College Avenue to Lakeland Avenue and a five-lane undivided roadway with a two-way left-turn lane and no shoulders from Lakeland Avenue to University Boulevard.

2005 FONSI Selected Alternative – Alternative 4: The Four-Lane Divided Alternative

The FONSI selected alternative proposes the reconstruction of US 1 as a 4-lane divided roadway with a raised median and accommodations for bicyclists and pedestrians. The typical section consists of two 11-foot inside travel lanes and two 16-foot outside travel lanes to accommodate on-street bicyclists. The travel lanes will be divided by a 16-foot wide, raised grass median that will narrow to four feet at intersections to accommodate left and U-turning vehicles. The selected alternative will also include landscaped grassy panel areas with street trees or in some areas a 2-foot paved panel area.

2015 Current Design

Consistent with the FONSI selected alternative, the Current Design proposes widening along US 1 to include two 11-foot inside travel lanes and two 16-foot outside travel lanes to accommodate on-street bicyclists. The existing 5-lane section between Lakeland Road and MD 193 will be converted to a 4-lane section with a raised landscaped median, varying in width between 6 and 16 feet. The Current Design will maintain turn lanes at each intersection. All sidewalks, pedestrian ramps, driveway entrances, and bicycle facilities comply with Americans with Disabilities Act (ADA) requirements. Design changes since the approved FONSI Selected Alternative (2005) include:

- New Storm Water Management (SWM) facilities including underground vaults along US 1 as part of Environmental Site Design (ESD).
- Minor shifts in the alignment (for a maximum of eight feet) within the existing footprint to accommodate SWM facilities, utilities, and ESD, as well as avoid impacts to new development. Changes in the impacts to specific resources are discussed in further detail in the Fact Sheet (See **Fact Sheet & Coordination Package**).
- New SWM facilities within the median of MD 193.

Public Involvement

Approximately 350 copies of the project newsletter were mailed on study area residents on October 29, 2014. Emails and letters received from the public primarily focused on requests for further informational/status updates and specific information about the bicycle facilities. Some responses from the public expressed concern that the bicycle lanes may be unsafe and suggested a separated, protected lane. A bicycle lane behind the curb was considered during the Value Engineering study, but was ultimately not supported by the design team since SHA's *Bicycle Policy and Design Guidelines* requires the provision of on-road bicycle accommodations.

A small number of responses expressed opposition to the project on the grounds that eliminating the two-way left-turn lane accommodations and installing a raised median would create traffic back-ups and dangerous lane changes. This was further evaluated by the project team, which ultimately determined that a raised median is needed for improved access management

Environmental Summary (See Impact Summary Table)

Michael Sybert [co-environmental manager], discussed the environmental impacts associated with Phase 1 as compared to the 2005 FONSI. The Current Design impacts right-of-way, business displacements, streams, and floodplains (See **Fact Sheet & Coordination Package**).

Updated coordination was initiated with the Maryland Historical Trust (MHT) regarding the current design of Phase 1 of the project. MHT concurred with SHA's finding of no adverse effect and acknowledged the FHWA's intent to make a de minimis impact finding on July 22, 2014. FHWA subsequently concurred with the de minimis finding on September 12, 2014. On December 2, 2014, SHA sent an updated finding of no adverse effect to MHT due to changes in the project scope requiring new signal equipment and the interconnect to the signals.

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In addition, there were miscellaneous design changes that have been made to the drainage pipes, the underground stormwater management vaults and the curb layouts that have caused shifts in the fee/easement lines. MHT again concurred with SHA's finding of no adverse effect the *de minimis* finding on December 23, 2014. A request was then sent to FHWA for concurrence on the *de minimis* impact finding on January 9, 2015 and FHWA subsequently concurred on January 23, 2015 (See **Fact Sheet & Coordination Package**).

Differences in impacts between the Current Design and 2005 FONSI can mainly be attributed to the identification and design of specific stormwater management facilities. The new storm drain outfalls will increase impacts to streams and the floodplain. The Current Design would increase the impacts to floodplains from 0.7 acre to 4.36 acres and would result in 40 linear feet of impacts to streams whereas the 2005 FONSI had none. Like the 2005 FONSI, the Current Design will not result in any impacts to wetlands or rare, threatened, and endangered species. Air quality and noise analyses were not required as the project proposes no increase in through traffic capacity.

Ultimately, the minor impacts associated with the Current Design will not result in any additional significant negative effects on the surrounding community. The Current Design will not substantially increase property acquisitions, as the number of businesses displaced in the Phase I limits decreases from four to two. This reduction is due to the fact that two of the previously displaced properties have since been removed by other development in the area. Right-of-way increased slightly from approximately 5.324 acres in the 2005 FONSI to 4.77 acres fee simple, 1.42 acres perpetual easement, and 1.95 acres temporary easement (8.14 acres total) under the Current Design (the 2005 FONSI did not divide the right-of-way into fee simple, perpetual easement, or temporary easement). The increase in right-of-way is due to minor shifts in the alignment and updated SWM and ESD needs and regulations. Richard Custom Tailors [also know as Tuxedo Shop] is now considered a newly identified displacement, however, the former Amoco Station (currently a BP station) is no longer a displacement due to shifts in the alignment to avoid impacting this business.

Jenkins Garage and Richard Custom Tailor are identified in the 2005 FONSI as high risk and low risk sites, respectively for potential hazardous materials. MDE records show that the Jenkins Garage was investigated for hazardous materials in 1999, but no further monitoring was required. The property is still an active garage that may contain environmental risks. Richard Custom Tailors offers dry-cleaning services; however, the dry-cleaning is done offsite. The two displacements under the current design will require a pre-demolition HAZMAT survey to be conducted by the Office of Materials and Technology once purchased.

Mitigation and Permits

All of the required permits and approvals will be obtained prior to the November 15, 2016 advertisement date. Mike Sybert discussed the mitigation requirements for this project.

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Stream and Floodplain Mitigation: A non-tidal wetland and waterways permit from the Maryland Department of the Environment will be required. A JPA will be submitted by November, 2015.

Right-of-Way: Right of way negotiations with affected the property owners in accordance with the “Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, amended June 10, 2005”.

Forest/ Aesthetics: A Memorandum of Understanding (MOU) between SHA and the University of Maryland College Park signed October 27, 2014 for median and roadside planting. The MOU established that the final plant selection, species, and placement will be mutually agreed upon and coordinated with the University of Maryland College Park.

The following updates (*below in italics*) are also provided to supplement discussion at the consultation meeting:

- The Fact Sheet stated that the project was state-funded for Final Design; **UPDATE:** The Fact Sheet has been updated to indicate that the project will use state-funds for right-of-way; federal funds are being used for the design.
- SHA is in the processes of procuring concurrence from UMD regarding the use of their recreational field for an underground stormwater vault and will update the consultation memo with any additional information. **UPDATE:** *Subsequent to the January meeting, further coordination with UMD determined that the proposed underground vault beneath the recreational field was not preferable. New design plans relocated the SWM to north of Paint Branch Road on the east side of US 1 (see See Fact Sheet & Coordination Package Attachment 10). SHA contacted MHT, who concurred that the new vault is located outside of the historic district and would not affect historic resources. MHT concurred that the project will continue to have no adverse effects (see See Fact Sheet & Coordination Package Attachment 11). Additionally, the site had previously been the location of a landfill; SHA coordinated with the EPA and the UMD Department of Environmental Safety regarding this landfill. The landfill was used to dispose of general construction materials. Neither the EPA nor UMD view the site as a risk for contamination, nor do they monitor the groundwater any longer. The proposed drilling and excavation for the vault poses no additional health issues for the workers, or a risk of spreading contamination. Therefore, there should not be any hazardous materials issues related to the new SWM vault.*

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Project Background

- A Finding of No Significant Impact (FONSI) was approved on July 17, 2005 for US 1 from College Avenue to I-95/I-495.
- Project is currently state funded for Right-of-Way (ROW). Federal funds are being used for design.
- The advertisement date is November 15, 2016 and the Notice to Proceed is yet to be determined.
- For funding reasons, this project has three construction phases:
 - Phase 1: College Ave. to University Blvd.
 - Phase 2: University Blvd and Hollywood Rd. [not active]
 - Phase 3: Hollywood Rd to I-95/I-495 [not active]

Project Description

- The 2005 FONSI reported:
 - The project includes US 1 from College Avenue to I-95/I-495 (Capital Beltway) in Prince George's County (Attachment 1).
 - The 2005 FONSI Selected Alternative, Alternative 4: The Four-Lane Divided Alternative, includes reconstructing US 1 as a four-lane divided roadway with a raised median and accommodations for bicyclists and pedestrians.
 - The typical section consists of two 11-foot inside travel lanes and two 16-foot outside travel lanes to accommodate on-street bicyclists.
 - The four travel lanes will be divided by a 16-foot, raised grass median; the median would narrow to four feet at intersections to accommodate left and U-turning vehicles.
 - Additional features of the alternative include either a six-foot landscaped grassy panel area with street trees in some locations or a two-foot paved panel area (panel type varies to minimize property impacts). Five-foot sidewalks and a three-foot utility easement will be included for either panel area along each side of the roadway.
- Current design (including minor refinements):
 - Current design is for Phase 1 from College Avenue to University Boulevard (MD 193) (Attachment 2). This phase is approximately 1.4 miles.
 - Consistent with the FONSI, widening along US 1 includes two 11-foot inside travel lanes and two 16-foot outside travel lanes to accommodate on-street bicyclists.
 - The existing five-lane section between Lakeland Road and MD 193 will be converted to a four-lane section with a raised landscaped median, varying in width between six and 16-feet.
 - Turn lanes will be maintained at each intersection.
 - All sidewalks, pedestrian ramps, driveway entrances, and bicycle facilities will be compliant with the Americans with Disabilities Act (ADA).

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- Other improvements include pavement resurfacing, landscaping, drainage system upgrades, stormwater management facilities, signage and pavement markings, intersection lighting and associated utility relocations.
- New design changes since FONSI approval include:
 - Storm Water Management (SWM) facilities along US 1 and within the median of MD 193 have been included as part of Environmental Site Design (ESD).
 - Minor shifts in the alignment (for a maximum of eight feet) within the existing footprint to accommodate SWM facilities, utilities, and ESD, as well as avoid impacts to new development.

Environmental Summary

Residential Relocations/Property Impacts

- The 2005 FONSI reported no residential relocations and 16 business displacements and 14.9 acres of new right of way required. Two of the 16 displacements are of abandoned buildings. These included Amoco Gas Station, Jenkins Garage and two abandoned buildings.
- Current design includes:
 - Two business displacements – Jenkins Garage and Richard Custom Tailors [also known as Tuxedo Shop].
 - No residential relocations.
 - 4.77 acres of Fee Simple right-of-way, 1.42 acres of perpetual easement, and 1.95 acres of temporary easement.
- The amount of businesses displaced in the Phase I limits decreases from four to two. This is due to the fact that two of the previously displaced properties have since been removed by other development in the area. The increase in right-of-way is due to shifts in the alignment and updated SWM and ESD needs and regulations. Richard Custom Tailors [as know as Tuxedo Shop] is now considered a newly identified take and the Amoco Station (currently a BP station) is no longer a take due to shifts in the alignment.

Cultural Resources

- The 2005 FONSI indicated that the Maryland Historical Trust (MHT) concurred with SHA's finding that the project would have no adverse effect on historic properties. There were no archaeological resources identified within the limits of the study; concurrence with the determination was received on November 24, 1998 from MHT.
- For Current design:
 - MHT concurred with SHA's finding of no adverse effect and acknowledged the FHWA's intent to make a *de minimis* impact finding on July 22, 2014 (Attachment 3).

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- MHT noted that it wished to receive more detailed landscape plans as they become available.
- FHWA provided concurrence on the *de minimis* impact finding on September 12, 2014.
- SHA sent an updated finding of no adverse effect to MHT on December 2, 2014 due to changes in the project scope requiring new signal equipment and the interconnect to the signals. In addition, there were miscellaneous design changes that have been made to the drainage pipes, the underground stormwater management vaults and the curb layouts that have caused shifts in the fee/easement lines. The previously requested landscape plans were provided as well. MHT concurred on December 23, 2014 (Attachment 4).
- SHA sent a request to FHWA for concurrence on the *de minimis* impact finding on January 9, 2014. FHWA provided concurrence on January 23, 2015 (Attachment 4).
- SHA contacted MHT regarding new design plans of the relocated SWM to the other of Paint Branch Road on the east side of US 1 (Attachment 1). MHT concurred that the new vault is located outside of the historic district and would not affect historic resources and that the project will continue to have no adverse effects (Attachment 11).
- The current design is consistent with the No Adverse Effect finding stated in the FONSI.

Streams

- The 2005 FONSI identified Paint Branch as the only Waters of the U.S. (WUS) within the study area. The FONSI Selected Alternative would result in no direct impacts to Paint Branch or other WUS.
- Current design impacts:
 - 40 linear feet (lf) and 550 square feet (sq.ft.) of impacts occur at the existing and proposed storm drain outfalls at US 1 over Paint Branch.
 - Nontidal Wetlands and Waterways Permit and Maryland State Programmatic General permit are required. Joint Permit Application (JPA) is anticipated to be submitted approximately in November, 2015. A JPA will be required for both the utility and boring permits. The permit will be approved prior to the ad date.
- This new impact is due to changes in storm drain outfalls in the FONSI as a result of revisions to storm drain design, as well as potential impacts from borings done as part of a scour analysis.

Wetlands/Wetland Buffer Impact

- The 2005 FONSI stated that the Selected Alternative would not result in any direct impacts to any wetlands.

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- Current design plans would not impact to wetlands and is consistent with the FONSI.

Floodplain Impact

- The 2005 FONSI stated that the Selected Alternate would require less than two acres of pervious surfaces be converted to impervious surfaces for roadway widening, which may have an impact on groundwater recharge in the immediate vicinity of the project. There is also minor grading and filling of approximately 0.7 acre required within the 100-year floodplain of Paint Branch. The FONSI stated that the Selected Alternative would not affect the natural and beneficial value of the floodplain, but a Maryland Department of Environment (MDE) non-tidal wetlands and waterways permit may be required.
- Current design will impact 4.36 acres (190,000 square feet) to the 100-year floodplain of Paint Branch. There is also a small area of impact due to the median bio-swales along MD 193. US 1 will be widened on both sides of the roadway; consequently, the sidewalks will not be replaced in existing locations.
- This new impact is due to the shift in alignment and new SWM and ESD regulations, including changes in storm drain outfalls as a result of revisions to storm drain design.

Rare, Threatened, and Endangered Species

- FONSI reported:
 - Coordination with the Maryland Department of Natural Resources (DNR) Wildlife Division and the U.S. Fish and Wildlife Service (USFWS) indicated that there are no records of any threatened, endangered, or special concern species within the study area.
- Current design:
 - Re-coordination with the DNR Environmental Review Unit (ERU), DNR Wildlife & Heritage Service, and USFWS was received on July 11, 2012, July 5, 2012, and May 9, 2012, respectively (Attachments 5-7). An updated online certification letter was obtained from USFWS utilizing the Information, Planning, and Conservation System (Attachment 8). No impacts are anticipated to rare, threatened, or endangered plant or animal species. Coordination will be updated in the spring to insure the information remains valid.

Air Quality

- The 2005 FONSI reported :
 - The mainline portion of the Selected Alternative is in conformity with the regional air quality plans and proposed improvements were designed to improve operation and safety without increasing through traffic capacity in the corridor.

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Therefore, air quality micro-scale carbon monoxide (CO) analyses were not required corridor wide.

- Prince George's County is not designated as non-attainment for CO, Nitrogen Dioxide (NO₂), Sulfur Dioxide (SO₂), Lead (Pb) or particulate matter (PM₁₀), but is designated as a serious nonattainment area for ozone (O₃).
- Project is in conformity with the State Implementation Plan (SIP) as it was analyzed as part of the SHA Statewide Transportation Improvement Program (STIP).
- A detailed micro-scale air quality analysis was performed during the preparation of the Environmental Reevaluation to determine the local CO impact of the proposed Cherry Hill Road At-Grade Options. The concentrations are all below the State and National Ambient Air Quality Standards (S/NAAQS) of 35 parts per million (ppm) in the one-hour and 9 ppm in the eight hour analyses.
- Current design:
 - The project is not located in a nonattainment or maintenance area for CO.
 - The Current Design project is included in the 2013 – 2018 National Capital Region Transportation Planning Board TIP, as TIP ID# 3108.
 - There will be no change in the number of through travel lanes along US 1; therefore, no change in travel demand, including the number of diesel vehicles, would occur as a result of the project.
 - The project will not result in changes in traffic volumes, vehicle mix, basic project location, or any other factor that would cause an increase in Mobile Source Air Toxics (MSAT) impacts of the project from that of the No-Build Alternative.
 - The Current Design projects would be considered as: "*Projects with No Meaningful MSAT Effects, or Exempt Projects,*" as described in the FHWA December 6, 2012 memorandum "Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA."

Noise

- The 2005 FONSI:
 - Because the alternatives were designed to improve operation and safety without providing additional capacity, an analysis of noise impacts and the identification of the need for sound barriers were not required.
- Current design:

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- With the addition of turn-lanes and median improvements only, the project would not be classified as a Type I project and thus, no noise analysis is required. The noise impacts discussed in the FONSI are not associated with Phase 1.

Hazardous Materials

- The 2005 FONSI stated four high risk properties, two medium-high risk properties, and one property with a medium risk for contaminants that will be replaced.
- The current design will displace Jenkins Garage and Richard Custom Tailor (also known as the tuxedo shop), listed in the 2005 FONSI as high risk and low risk, respectively. Jenkins Garage has had one MDE case but it was closed in 1999 with no further monitoring required. The property is still an active garage that may contain environmental risks. Richard Custom Tailors offers dry-cleaning services; however, the cleaning is done offsite. The two displacements under the current design will require a pre-demolition HAZMAT survey once purchased.
- The proposed SWM vault located north of Paint Branch Road on the east side of US 1 (Attachment 10) is located on a site that was previously the location of a landfill. SHA coordinated with the EPA and the UMD Department of Environmental Safety regarding this landfill. The landfill was used to dispose of general construction materials. Neither the EPA nor UMD view the site as a risk for contamination, nor do they monitor the groundwater any long. The proposed drilling and excavation for the vault poses no additional health issues for the workers, or a risk of spreading contamination. Therefore, there should not be any hazardous materials issues related to the new SWM vault.

Mitigation / Permits

Streams

- A non-tidal wetland and waterways permit issued by the Maryland Department of the Environment will be required.
- A JPA will be submitted in November, 2015.

Floodplains

- A non-tidal wetland and waterways permit issued by the Maryland Department of the Environment will be required.
- A JPA will be submitted in November, 2015.

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Right-of-Way

- ROW Negotiations are required with the property owners. All relocations will be completed in accordance with the “Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, amended June 10, 2005”.

Forest

- SHA will obtain a Roadside Tree Permit through MD DNR. There are no woodland impacts, only impacts to individual trees; mitigation efforts will be conducted on site.

Aesthetics

- A Memorandum of Understanding (MOU) between SHA and the University of Maryland College Park signed October 27, 2014 for median and roadside planting. The MOU established that the final plant selection, species, and placement will be mutually agreed upon and coordinated with the University of Maryland College Park.

Local Involvement

- On April 11, 2014, a project progress meeting was held and representatives from the City of College Park, the University of Maryland, and Prince George’s County attended.
- A meeting between SHA and the City of College Park was held on May 8, 2014 to discuss traffic circulations and U-turn restrictions.
- A coordination meeting between the hotel developer, University of Maryland, and SHA was held on June 20, 2014.
- On July 9, 2014, a coordination meeting between SHA and the University of Maryland was held to discuss miscellaneous items related to the project.

Public Involvement

- A project newsletter was mailed on October 29, 2014 (Attachment 9). 367 copies were distributed in an area bounded by MD 201 to the West, MD 410 to the South, Adelphia Road to the East, and Sunnyside Avenue to the North.
- Emails and letters received from the public primarily focused on requests for further informational/status updates and specific information about the bicycle facilities. Some responses from the public expressed concern that the bicycle lanes may be unsafe and suggested a separated, protected lane. A bicycle lane behind the curb was considered during the Value Engineering study, but was ultimately not supported by the design team since SHA’s *Bicycle Policy and Design Guidelines* requires the provision of on-road bicycle accommodations.
- Other correspondence expressed opposition to the project on the grounds that eliminating the two-way left-turn lane accommodations and installing a raised median would create

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traffic back-ups and dangerous lane changes. However, a raised median is needed for better access management.

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Summary of Impacts

Environmental Resources	2005 FONSI (11 miles)	2005 FONSI Phase I Limits*	Current Design Plans (Phase I – from College Ave. to University Boulevard) (1.4 Miles)
Socioeconomic Resources			
Right-of-Way (acres)	14.9	5.324	4.77 <i>Fee Simple</i> 1.42 <i>Perpetual Easement</i> 1.95 <i>Temporary Easement</i>
Residential Relocations (no.)	0	0	0
Business Displacements (no.)	14(16)**	2(4)***	2
Parks	0	0	0
Environmental Justice Communities	1	1	1
Consistent with area land use plans?	Yes	Yes	Yes
Cultural Resources			
Archaeological Sites	No adverse effect	No adverse effect	No adverse effect
Standing Structures	No adverse effect	No adverse effect	No adverse effect
Natural Resources			
Stream impact (lf)	0	0	40
100-Year Floodplain (acres)	0.7	0.7	4.36
Wetlands (acres)	0	0	0
Woodland/Forest (acres)	0	0	<1
RTE	0	0	0
Air Quality			
Violations of CO S/NAAQS (number)	0	0	0
Noise			
Impacted NSAs	N/A	N/A	N/A
Hazardous Waste Sites			
Potential site(s) affected (no.)	7	4	2

*Numbers for Phase I estimated from FONSI LOD.

**Of the 16 displacements, two were abandoned buildings

***Of the 4 displacements, two were abandoned buildings

