Draft Section 4(f) Evaluation

I-270/US 15 Multi-Modal Corridor Study
Montgomery and Frederick Counties

May 2009

I-270/US 15 Multi-Modal Corridor Study

Draft Section 4(f) Evaluation

The following Draft Section 4(f) Evaluation has been undertaken to evaluate the potential impacts of Alternatives 6A/B and 7A/B on Section 4(f) resources in the project area, including publicly-owned public parks and recreation areas and historic sites. This draft evaluation is summarized in the Alternatives Analysis/Environmental Assessment (AA/EA) for the I-270/US 15 Multi-Modal Corridor Study (May 2009).

A draft Section 4(f) Evaluation, completed for Alternatives 3A/B, 4A/B and 5A/B/C, was included in the 2002 Draft Environmental Impact Statement (DEIS) for the project.

Following the finalization and public review of the AA/EA, a Tier 1 Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) is anticipated to provide the basis for a Locally Preferred Alternative/Selected Alternative (LPA/SA). The final Section 4(f) Evaluation will detail the impacts of the LPA/SA on Section 4(f) resources, and complete the evaluation for avoidance and measures to minimize harm for unavoidable impacts. SHA and MTA intend to pursue *de minimis* findings for the following public parks: Malcolm King Park, Morris Park, Seneca Creek State Park, Middlebrook Hill Neighborhood Conservation Area, North Germantown Greenway, Black Hill Regional Park, Little Bennett Regional Park, Urbana Lake Fish Management Area, and Urbana Community Park.

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I. INTRODUCTION

Section 4(f) of the U.S. Department of Transportation Act of 1966, 49 USC 303(c), requires that the proposed use of land from any publicly-owned public park, recreation area, wildlife and/or waterfowl refuge, or any significant historic site, as a part of a federally funded or approved transportation project, is not permissible unless:

a) The Federal Highway Administration (FHWA) determines there is no feasible and prudent avoidance alternative to the use of land from the property, and the action includes all possible planning to minimize harm to the property resulting from such use (23 CFR 774.3(a)); or

b) The FHWA determines the use of the Section 4(f) property, including any measures to minimize harm (such as avoidance, minimization, mitigation, or enhancements measures) committed to by the applicant, will have a *de minimis* impact on the property (SAFETEA-LU Section 6009(P.L. 109-53) and 23 CFR 774.3(b)).

Final action requiring the taking of such land must also document and demonstrate that the proposed action includes all measures to minimize harm to the property as a result of such use. The I-270/US 15 Multi-Modal Study project team has continued on-going coordination with owners of Section 4(f) properties that may require such use as a result of the project. Copies of correspondence with owners of Section 4(f) properties are included in **Attachment A**.

This Section 4(f) evaluation is undertaken as a result of potential property acquisition from 13 publicly-owned public parks/recreation areas and seven historic properties which may be required for Alternatives 6A/B and 7A/B.

DEFINITIONS

Section 4(f) defines the use of property as:

- Land from a 4(f) site is permanently incorporated into a transportation facility,
- There is a temporary occupancy of land that is adverse in terms of the Section 4(f) statute's preservationist purposes,
- A constructive use, or
- A *de minimis* impact on the property, as defined in 23 CFR 774.17:
  (1) For historic sites, *de minimis* impact means that the Administration has determined, in accordance with 36 CFR part 800, that no historic property is affected by the project or that the project will have "no adverse effect" on the historic property in question.
  (2) For parks, recreation areas, and wildlife and waterfowl refuges, a *de minimis* impact is one that will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f).

Further, constructive use is only possible in the absence of permanent incorporation or temporary occupancy of the type that constitutes a use of 4(f) land. Constructive use only occurs where, including mitigation, the proximity impacts of a project on section 4(f) property are so severe

that the activities, features or attributes that qualify the property for protection under Section 4(f) are substantially impaired (diminished).

A. DESCRIPTION OF PROJECT

The Maryland State Highway Administration (SHA) and the Maryland Transit Administration (MTA) are proposing improvements to the I-270/US 15 Corridor from the Shady Grove Metrorail Station south of I-370 in Montgomery County, Maryland, to the US 15/Biggs Ford Road intersection north of the City of Frederick in Frederick County, Maryland. The project area is shown on ***Figure I-1***.

The project includes a Transportation System Management/Transportation Demand Management (TSM/TDM) component, a highway component (the addition of general purpose lanes, High Occupancy Vehicle (HOV) lanes or Express Toll Lanes^{SM} (ETLs^{SM}), auxiliary lanes, interchanges, and interchange improvements) a transit component (either Light Rail Transit (LRT) or Bus Rapid Transit (BRT) on the Corridor Cities Transitway (CCT) or Premium Bus Service on managed lanes and a transit operations and maintenance (O&M) facility, and a hiker-biker trail adjacent to the CCT. The components of the proposed improvements are detailed in **Section C**.

Nine alternatives, including the No-Build Alternative, a Transportation System Management/ Transportation Demand Management (TSM/TDM) Alternative, and build Alternatives 3A/B, 4A/B and 5A/B/C, were evaluated in the 2002 Draft Environmental Impact Statement (DEIS). Two additional alternatives, 6A/B and 7A/B, are introduced in the 2009 Alternatives Analysis/Environmental Assessment (AA/EA). This Section 4(f) Evaluation focuses on Alternatives 6A/B and 7A/B.

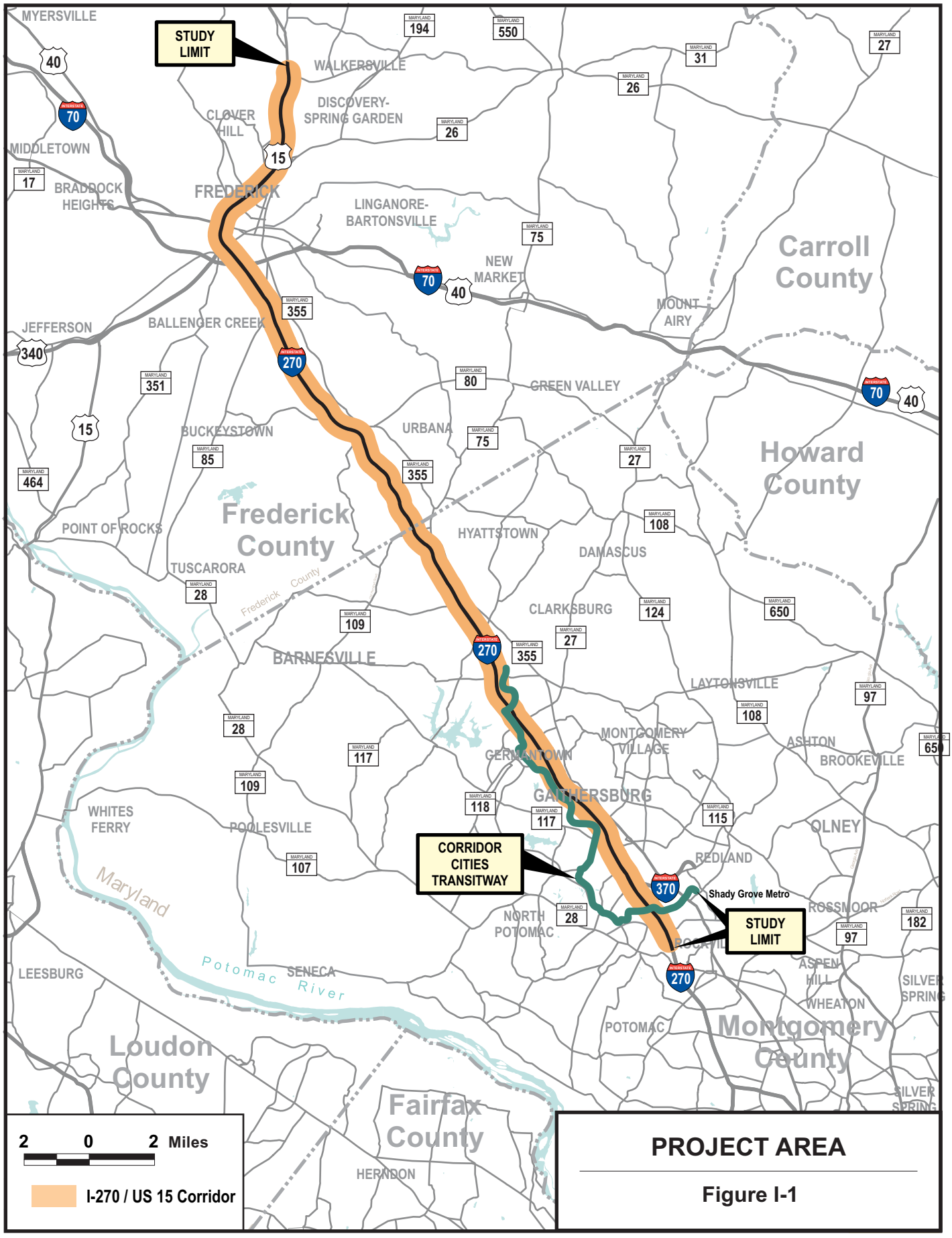
B. PURPOSE AND NEED

1. Project Purpose

The purpose of the I-270/US 15 Multi-Modal Corridor Study is to investigate options to address congestion and improve safety conditions along the I-270/US 15 Corridor. The I-270/US 15 Corridor provides an essential connection between the Washington, DC metropolitan area and both central and western Maryland and is an important corridor for carrying local and long distance trips, both within and beyond the Corridor.

2. Project Need

The need for the project results from the mobility challenges from the growing traffic congestion in the I-270 and US 15 corridors. Population and employment growth in Montgomery and Frederick Counties is expected to cause peak period traffic congestion along the I-270/US 15 Corridor to worsen. The lack of alternate, high-speed routes within the corridor also contributes to congestion on I-270 and US 15. Transit provides an alternative, but express and local bus service travels in mixed traffic in the study area and is subject to the same congestion as other vehicles. Rail services such as MARC and Metrorail provide fast, reliable travel options for


STUDY LIMIT
CORRIDOR CITIES TRANSITWAY
STUDY LIMIT
Shady Grove Metro
MYERSVILLE
WALKERSVILLE
DISCOVERY-SPRING GARDEN
CLOVER HILL
MIDDLETOWN
BRADDOCK HEIGHTS
FREDERICK
LINGANORE-BARTONSVILLE
NEW MARKET
Carroll County
MOUNT AIRY
JEFFERSON
BALLENGER CREEK
BUCKEYSTOWN
URBANA
GREEN VALLEY
Howard County
POINT OF ROCKS
Frederick County
HYATTSTOWN
DAMASCUS
TUSCARORA
CLARKSBURG
BARNESVILLE
LAYTONSVILLE
MONTGOMERY VILLAGE
ASHTON
BROOKEVILLE
GERMANTOWN
GAITHERSBURG
WHITES FERRY
POOLESVILLE
OLNEY
REDLAND
NORTH POTOMAC
ROSSMOOR
ASPEN HILL
WHEATON
SILVER SPRING
POTOMAC
Montgomery County
LEESBURG
SENECA
Maryland
Potomac River
Loudon County
Fairfax County
HERNDON
2 0 2 Miles
I-270 / US 15 Corridor
PROJECT AREA
Figure I-1

some residents of the study area. However, access to Metrorail is hampered by the same traffic congestion as other traffic and parking at some of the existing MARC and Metrorail stations is filled to capacity before the morning peak travel hours are over. Refer to the 2002 DEIS, Chapter I.D., for a more complete description of the capacity and safety problems of alternate routes including MD 355.

3. Project Goals

In order to more effectively evaluate the proposed transportation strategies and alternatives, the project team developed five goals for this project. These goals were developed in consultation with the I-270/US 15 Multi-Modal Corridor Study Focus Group, approximately 20 individuals representing business and community interests in the project area to review and offer input for the many transportation improvement options and evaluation measures. The five project goals are:

Support Orderly Economic Growth
Support the orderly economic development of the I-270/US 15 Corridor consistent with the local government land use plans and Maryland's Economic Growth, Resource Protection and Planning Act.

Enhance Mobility
Provide enhanced traveler mobility throughout the I-270/US 15 Corridor by: optimizing travel choices by destination, mode and route; minimizing delay; and improving the safety and overall efficiency of the transportation system.

Improve Goods Movement
Facilitate the movement of goods within and through the I-270/US 15 Corridor and improve the delivery of services in support of the regional and local economies.

Preserve and Protect the Environment
Deliver transportation services in a manner that preserves, protects and enhances the quality of life and social, cultural and natural environment in the I-270/US 15 Corridor.

Optimize Public Investment
Provide a transportation system in the I-270/US 15 Corridor that makes optimal use of existing transportation infrastructure while making cost effective investments in facilities and services that support other project goals.

C. PROJECT BACKGROUND

The I-270 Corridor has been the subject of transit service studies since 1970, conducted by local and state agencies to address transportation needs in the corridor. The I-270/US 15 Multi-Modal Corridor Study DEIS was approved by the FHWA, Federal Transit Administration (FTA), SHA, and MTA in May 2002 and published for review and comment.

Following publication of the DEIS in May 2002, Public Hearings were held to receive comments on the document on June 25, 2002 in Montgomery County and on June 27, 2002 in Frederick County. The public comment period ended on August 16, 2002.

In the fall of 2003, the Maryland Department of Transportation (MDOT) directed the SHA to consider the ETL concept as an alternative for the I-270/US 15 Corridor. Public Workshops were held on June 29 and 30, 2004, to introduce the ETL concept for the project. Written comments were received from 22 citizens. An almost equal number of comments focused on transit and highway concerns, and comments were fairly equally divided in favor of or against the ETL concept.

1. Master Plan Context

In general, the master plan context for improvements in the I-270/US 15 Corridor is based on the Frederick and Montgomery County master planning documents, including:

- Montgomery County's *On Wedges and Corridors* master plan and the area plans within which the I-270 Corridor lies the Gaithersburg Vicinity, Germantown, Clarksburg and Hyattstown area plans, and

- Frederick City and County comprehensive plans and the area plans for the Frederick and Urbana Regions.

Three of these master plans are currently being updated the *Gaithersburg Vicinity-Shady Grove Master Plan Amendment* (November 1996), the *Gaithersburg Vicinity Master Plan Amendment* (July 1990) and the *Germantown Master Plan* (1990). Master plans that have been updated since the 2002 DEIS include

- The *Frederick Region Plan* (update adopted July 2002) supports the selection of any of the alternatives in the DEIS (including highway widening, and interchange improvements) and identifies additional recommendations for intersections on US 15 and the preservation of a transitway into downtown Frederick.

- The *Urbana Region Plan* (update adopted June 2004) recommends that I-270 be widened to six or eight lanes, construction of a new interchange on I-270 at MD 75, improvements to the MD 80 interchange and consideration of an additional interchange at Park Mills Road. The *Urbana Region Plan* also supports the preservation of a transitway in Frederick County.

- The *City of Frederick Comprehensive Plan* (update adopted September 2004) recommends the implementation of the improvements in the I-270/US 15 Multi-Modal Corridor Study DEIS, supports direct transit service to Montgomery County and Washington, DC employment centers as well as reverse commute service, and identifies an extension of Maryland Rail Commuter (MARC) service through the City.

There are no updates available for the *Clarksburg Master Plan and Hyattstown Special Study Area* or the Frederick County Comprehensive Plan.

The MTA *MARC Master Plan/Strategic Plan* is used as an internal document by MTA as a guide to capital project planning.

In winter 2005, MDOT developed *Maryland's Statewide Express Toll Lanes Network Initiative*, which provides an overview of the state's vision for regional connectivity through the implementation of managed lanes (including ETL, HOV, and High Occupancy Toll (HOT)) on major transportation routes. The implementation of ETLs on I-270 between the Capital Beltway (I-495) and I-70 is included in MDOT's regional plan.

2. Programmed Improvements

Programmed improvements associated with and within the I-270/US 15 Corridor are identified in the Metropolitan Washington Council of Government (MWCOG) 2004 Constrained Long Range Transportation Plan (CLRP) and in the Maryland Consolidated Transportation Program 2006 – 2011 (CTP) and listed in ***Table I-1***.

Table I-1: Transportation Improvements Programmed for I-270/US 15 Corridor Included in 2030 Forecasts

Location	Description	Projected Completion Date
Highway Upgrade, Reconstruction, Extension and Widening Projects		
I-70 from Mt. Phillip Road to MD 144 (Baltimore National Pike)	Ramps EB I-70 to MD 355; relocated MD 85 at MD 355; widen MD 355 from S of I-70 for 2,000 feet	Under construction
	Extend MD 475 (East St) from South St to proposed Monocacy Blvd, including SWM ponds and new urban diamond interchange with I-70 and ramps to Walser Drive	2009
	Widen to 4-6 lanes, New Design Rd to Mt. Phillip Rd	2015
I-270 Interchange at Watkins Mill Rd	Widen and extend Watkins Mill Rd from 4-6 lanes; construct interchange; add 2-lane CD roads NB & SB on I-270	2025
MD 85 from English Muffin Way to N of Grove Rd	Upgrade, widen to 4 or 6 lanes	2025
MD 117 from Great Seneca Park to I-270	Improve roadway and reconstruct intersections to provide capacity and improve operations	2015
MD 118 from MD 355 to M-83/Watkins Mill Rd	Extend MD 118 as a 6-lane divided highway (includes bicycle/pedestrian accommodation)	2020
MD 355/MD 80 Urbana Bypass, east of I-270 north & south of Urbana	Construct to 4 lanes relocated east of I-270, from north of MD 80 to south of MD 80, including intersection (2 separate projects)	2005
Father Hurley Blvd from Wisteria Rd to MD 118 Relocated	Construct final link of Father Hurley as a 4- or 6-lane roadway (includes bridge over CSX; includes bicycle/pedestrian accommodation)	2010
Middlebrook Road Extended from MD 355 to M-83	Study to construct 6 lanes	2006
Intercounty Connector (ICC)	Construct toll freeway between I-270 and I-95/US1; engineering and row acquisition under way	2010

Table I-1: Transportation Improvements Programmed for I-270/US 15 Corridor Included in 2030 Forecasts

Location	Description	Projected Completion Date
TRANSIT EXTENSIONS AND PARKING EXPANSION PROJECTS		
Montgomery County	Construction of transit center at Olney	2010
Montgomery County	Construction of transit center at Silver Spring	TBD
Point of Rocks MARC Station	Parking lot expansion – construction to begin December 2006	2008

Sources: MWCOG 2004 CLRP (11/17/2004) Major Highway Improvements and Major HOV/Transit Improvements.

3. Project Changes

Since the 2002 DEIS, the following improvements have been completed in the Corridor

- I-270/MD 117 Interchange – An interchange improvement was completed that added a 368-space park and ride lot.
- US 15/MD 26 Interchange – An interchange improvement project was completed in 2006, adding a new northbound on-ramp to US 15 at this location.
- MD 124 from MD 28 to Longdraft Road – The roadway was reconstructed as a six-lane highway.
- MD 28 from Riffle Ford Road to Shady Grove Road – MD 28 was widened to a four-lane divided highway, with six lanes between Muddy Branch Road and Shady Grove Road.
- Shady Grove Metrorail Station Parking Garage – A second garage opened in May 2003, adding 2,140 additional spaces for a total parking capacity of 5,865 spaces.
- Montgomery County Transit Centers – A 5---space park and ride lot and town center was opened at US 29 and MD 198 in Burtonsville, and a 300-space park and ride lot was opened at Lakeforest Mall in Gaithersburg.
- Ride-On Express Bus from Germantown to Shady Grove – Bus Route 100 operates directly on I-270 and I-370 and was greatly expanded in 2006 to provide more frequent service in peak periods.
- US 15 Auxiliary Lane - An auxiliary lane was constructed in 2004 on US 15 southbound connecting the Rosemont Avenue southbound on-ramp with the US 40 southbound off-ramp deceleration lane.
- I-270 Auxiliary Lane – An auxiliary lane was constructed in 2007 on I-270 southbound connecting the I-70 eastbound on-ramp acceleration lane with the MD 85 southbound off-ramp deceleration lane.
- MD 355 at I-70 – New ramps were constructed from eastbound I-70 to MD 355, MD 85 was relocated at MD 355, and MD 355 was widened from south of I-70 for 2,000 feet.
- MD 27 was widened to six lanes from Observation Drive to MD 355.

Changes in the project's description since the 2002 DEIS include Express Toll Lanes, interchanges, and transit elements as described in the following sections.

a. Express Toll Lanes

Express Toll Lanes (ETLs) are generally new capacity tolled highway lanes which can be combined with existing highway lanes, providing motorists a choice to pay a fee for a relatively congestion-free trip when travel time is critical. Tolls, collected electronically, would vary based on demand, and would provide an additional source of funding for roadway construction and maintenance. ETLs, like HOV lanes, can be used by public buses to improve travel times for transit users. Two alternatives, 6A/B and 7A/B, would include the implementation of one or two ETLs and direct access ramps as part of the highway component. The addition of ETLs resulted in a change in the southern limit for mainline construction to approximately 2,000 feet south of the I-270/Shady Grove Road interchange to allow for transition between the ETLs and existing HOV lanes.

b. Residential Displacement Minimization

Proposed improvements shown in the DEIS and at the June 2002 Public Hearings identified 35 residential displacements in the Fox Chapel community. A minimization option was designed subsequent to the 2002 DEIS that would potentially avoid displacements in this community. Avoidance and minimization of residential displacements is continually being reviewed and shall continue as design proceeds.

c. Interchanges

The southbound ramps at the proposed interchange at I-270/Newcut Road have been reconfigured to the southwest quadrant based on environmental coordination with the US Army Corps of Engineers. The proposed interchange reconfiguration represents an alternative to be considered versus the configuration proposed in the DEIS.

The I-270/MD 121 interchange improvements have been broken out as a separate project, led by a private developer. The planning study investigated additional transportation movements that were not included in the DEIS, due to newly-approved development west of the existing interchange. The selected interchange improvements are under design for construction in 2009.

The I-270/MD 85 intersection has been reconfigured from the DEIS to address changes in traffic forecasts.

The US 15 interchange with Monocacy Boulevard/Christopher's Crossing has been broken out as a separate project planning study led by SHA, and project planning is nearly complete.

The I-270/I-370 direct access ramps have been reconfigured to reduce the number of residential displacements north of the interchange.

The I-270/MD 117 interchange has been modified from the DEIS configuration to accommodate potential ETL direct access to/from the south. The proposed southbound I-270 exit ramp has been eliminated due to a change in traffic projections.

The I-270/Watkins Mill Road HOV direct access ramps described in the DEIS have been relocated to a proposed Metropolitan Grove Road Extended interchange (between MD 124 and

the proposed Watkins Mill Road interchange). The Metropolitan Grove Road Extended interchange would provide access to/from the ETLs only and would provide access to the proposed Metropolitan Grove CCT station and the existing Metropolitan Grove MARC station.

The MD 118 bridge over I-270 is proposed to be relocated to accommodate the ETL direct access ramps.

d. Collector-Distributor (CD) Roadways

The existing northbound CD roadway system, signed as the "Local" lanes, would be removed from I-370 to north of MD 124 to accommodate the proposed ETL roadway alternatives. The CD roadway between Montrose Road and I-370 will remain in place.

e. Transit Elements

Since the publication of the 2002 DEIS, the MTA has dropped the proposed School Drive Station from further consideration. Montgomery County approved development in this area which, when built, prevented the use of the School Drive site for a station. Some of the proposed locations for the CCT O&M facilities have been eliminated through the screening process, and new sites have been added. As described in Chapter II of the AA/EA, of the eight sites retained in the DEIS for additional study, only one site is still being considered and four new sites have been identified. At this time, two sites in the Shady Grove area, two sites in the Metropolitan Grove area and one site in the COMSAT area are being studied. Some of these sites would be suitable for LRT or BRT only.

D. ALTERNATIVES CONSIDERED

The I-270/US 15 Multi-Modal Corridor Study is considering the addition of both highway and transit improvements. The study looks at several ways to add capacity to the highway, including the addition of general purpose (GP) lanes or managed lanes – either HOV lanes or ETLs. Other proposed highway improvements include the addition of collector/distributor (CD) lanes, acceleration/deceleration lanes, auxiliary lanes, new and improved interchanges, and park and ride lots.

The transit alternatives being considered are LRT or BRT on the CCT, Premium Bus service operating on the highway's managed lanes, and a shared use path for bicyclists and pedestrians.

The various transportation modes and system improvements under consideration are defined as are the alternatives evaluated in the 2002 Draft Environmental Impact Statement (DEIS). This Section 4(f) Evaluation analyzes the AA/EA Alternatives 6A/B and 7A/B. Descriptions of both the DEIS and AA/EA alternatives are provided to assist the reader in understanding the entire proposed project.

1. Highway Improvement Descriptions

The I-270/US 15 highway alternatives propose various types of improvements. A brief description of the various lane types includes:

- ***General Purpose*** (GP) lanes are regular traffic lanes designed to accommodate all motor vehicle traffic on interstate and state highways, generally posted at speeds of 55 miles per hour or higher.
- ***High-Occupancy Vehicle*** (HOV) lanes are dedicated lanes which can only be used by vehicles with two or more occupants or by motorcycles. They may be separated from the GP lanes by striping or by a barrier. HOV lanes are managed lanes which are designed to encourage carpooling. I-270 currently has one HOV lane, designated as HOV-2, in both the northbound and southbound directions. HOV-2 requires at least two persons per vehicle.
- ***Express Toll Lanes*** (ETLs) are another type of managed lanes designed to alleviate congestion in GP lanes and provide relatively free-flowing traffic. ETLs are limited-access, tolled interstate highway lanes that are usually barrier-separated from GP lanes. Motorists who wish to travel in the less congested ETLs pay a toll that is collected at highway speeds by an *E-ZPass*™ transponder.
- ***Collector/Distributor*** (CD) lanes are one-way roads next to the interstate that operate similar to frontage roads. CD lanes provide relatively free-flowing lanes for shorter trips and are used to collect entering and exiting traffic at interchanges. This helps to eliminate weaving traffic in the main lanes of the interstate. CD lanes are barrier-separated from GP lanes and access between the CD and GP lanes is limited. I-270 currently uses a CD lane system designated as the "Local" lanes.
- ***Direct Access*** ramps provide direct, barrier-separated access to/from managed lanes at a limited number of locations along the highway. The direct access ramps provide continuity of travel and eliminate the necessity of merging managed lane and GP lane traffic at exits and entrances.
- ***Acceleration/deceleration*** lanes extend the length of entry and exit ramps to provide adequate distance for entering vehicles to reach highway speeds before merging with through traffic or allow exiting vehicles to slow to appropriate ramp speeds.
- ***Auxiliary*** lanes are acceleration and deceleration lanes connected between consecutive interchange ramps, so that vehicles traveling from one interchange to the next do not have to merge with the through highway lanes. They may eliminate some weaving between interchanges and provide a longer distance for vehicles entering the roadway to reach highway speeds.

2. Transit Descriptions

The following terms describe important elements of the transit alternatives:

- ***Corridor Cities Transitway*** (CCT) is a reserved transit corridor that is identified in Montgomery County and Frederick County master plans. The CCT alignment extends from the Shady Grove Metrorail Station in Gaithersburg, Montgomery County, to downtown Frederick in Frederick County. For the I-270/US 15 Multi-Modal Corridor Study, transit is only being considered between Shady Grove and the COMSAT area in Clarksburg, Montgomery County.
- ***Light Rail Transit*** (LRT) is an electric railway system that can operate single cars or short trains. The LRT system proposed for this project would operate completely on a dedicated right-of-way, or guideway, separated from traffic on local streets.

- ***Bus Rapid Transit*** (BRT) is a mode of transit that has characteristics common to both conventional bus systems and LRT. BRT for this project would use rubber-tired transit vehicles, most likely articulated buses, along a reserved transit guideway. Vehicles would be similar to LRT vehicles in performance and appearance. However they would be able to leave the transit guideway to access local destinations using the local road network.
- ***Premium Bus*** service would provide bus service using dedicated (managed) highway lanes and direct access ramps to travel from station to station. Premium bus provides limited stop service and non-stop service between origins and destinations.
- ***Corridor Cities Transitway Bike Path***, as denoted in Montgomery County planning documents, is a shared-use, hiker/biker trail that is an integral part of both the I-270/US 15 Multi-Modal Corridor Study and Montgomery County's bikeway network.

3. Alternatives

The alternatives being considered for the I-270/US 15 Multi-Modal Corridor Study include those presented in the 2002 DEIS (Alternatives 1, 2, 3A/B, 4A/B and 5A/B/C), two new build alternatives (Alternatives 6A/B and 7A/B), and the alternatives required to complete the FTA Alternatives Analysis (Alternatives 6.1 and 6.2). Brief descriptions of the alternatives are presented below.

a. Alternatives Evaluated in the 2002 DEIS

Nine alternatives, listed in ***Table I-2,*** were retained and evaluated in the DEIS, including:

- Alternative 1: the No-Build Alternative;
- Alternative 2: TSM/TDM Alternative; and
- Build Alternatives 3A/B, 4A/B and 5A/B/C, each of which consisted of a highway component and a transit component.

Table I-2: Alternatives Retained in the 2002 DEIS

Alternative	Description
1	No-Build Alternative
2	TSM/TDM Alternative
3A	Master Plan[1] HOV/LRT Alternative
3B	Master Plan[1] HOV/BRT Alternative
4A	Master Plan[1] General-Purpose/LRT Alternative
4B	Master Plan[1] General-Purpose/BRT Alternative
5A	Enhanced[2] Master Plan HOV/General-Purpose/LRT Alternative
5B	Enhanced[2] Master Plan HOV/General-Purpose/BRT Alternative
5C	Enhanced[2] Master Plan HOV/General-Purpose/Premium Bus Alternative

1 Master Plan refers to proposed alignments along I-270 & US 15 included in the current Frederick and Montgomery County approved master plans.

2 Enhanced Master Plan refers to proposed improvements that are greater than called for in the Montgomery County Clarksburg Area Master Plan.

Alternative 1: No-Build Alternative

The No-Build Alternative (Alternative 1) serves as a basis for comparing all other alternatives. The No-Build Alternative does not provide any major changes to the existing transportation network. The No-Build Alternative includes minor repairs, maintenance, and safety improvements, as well as programmed improvements identified in the State's fiscally-constrained long range transportation plan, with the exception of the proposed improvements in this study. The existing I-270 roadway is a fully access-controlled highway that provides a combination of CD, GP and HOV lanes in the northbound direction and between two and four GP lanes in the southbound direction. US 15 is a fully access-controlled highway through the City of Frederick and has limited access north of Frederick. US 15 has two GP lanes in each direction.

Alternative 2: TSM/TDM Alternative

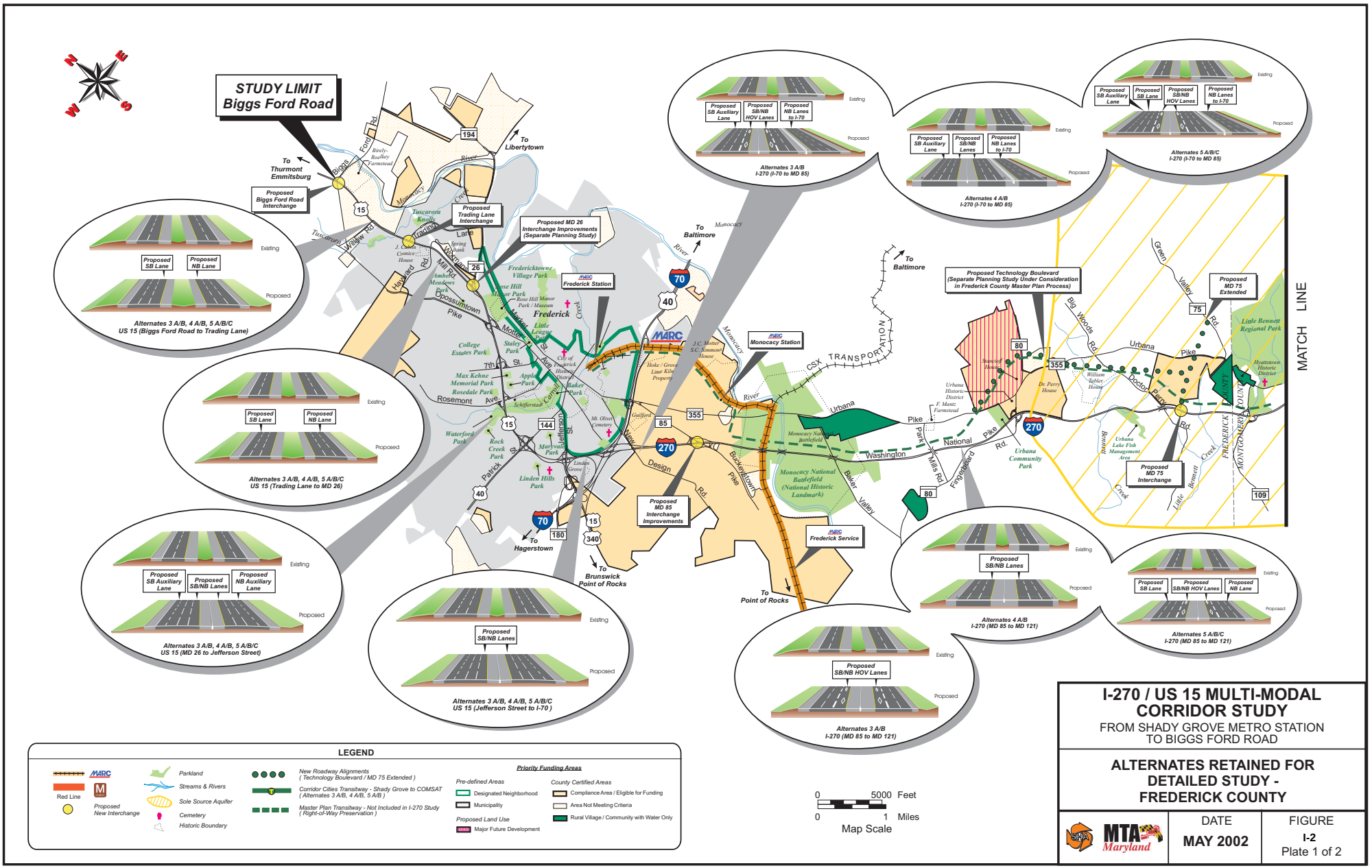
The TSM/TDM Alternative (Alternative 2) includes a number of relatively low-cost measures that are meant to improve the overall operation of the existing transportation system without major capacity improvements. TSM measures include increased local bus service, enhanced feeder bus service to existing fixed guideway transit, the addition of intelligent transportation systems to improve traffic flow and incident management on I-270, and interactive transit information made available at major employment centers. TDM measures include adding park and ride lots, rideshare programs, vanpool, pedestrian and bicycle programs, and telecommuting and flexible work hours programs. The TSM/TDM alternative also includes programmed improvements. The elements of the TSM/TDM alternative are also included as a component of each of the build alternatives.

Alternatives 3A and 3B

Alternatives 3A and 3B, as retained in the 2002 DEIS, would add GP lanes, HOV lanes, auxiliary lanes, and direct access ramps along I-270 and GP lanes and auxiliary lanes along US 15. Alternative 3A would provide LRT on the CCT from the Shady Grove Metrorail station to the COMSAT area in Montgomery County, while Alternative 3B would provide BRT service on the CCT between the same destinations. Alternatives 3A/B are shown on ***Figures I-2*** and ***I-3*** and can be reviewed in detail in the 2002 DEIS in Volume 2, Chapter XI.

The highway improvements would include the following:

- Between I-370 and Father Hurley Boulevard, I-270 would have three GP lanes and one HOV lane in each direction, barrier-separated from CD and auxiliary lanes as necessitated by projected traffic volumes. GP lanes would be separated from HOV lanes by striping.
- Between Father Hurley Boulevard and MD 121, I-270 would have four GP lanes and one HOV lane in each direction, with GP lanes separated from HOV lanes by striping.
- From MD 121 to MD 85, I-270 would have two GP lanes and one HOV lane in each direction, with GP lanes separated from HOV lanes by striping.



I-270 / US 15 MULTI-MODAL CORRIDOR STUDY

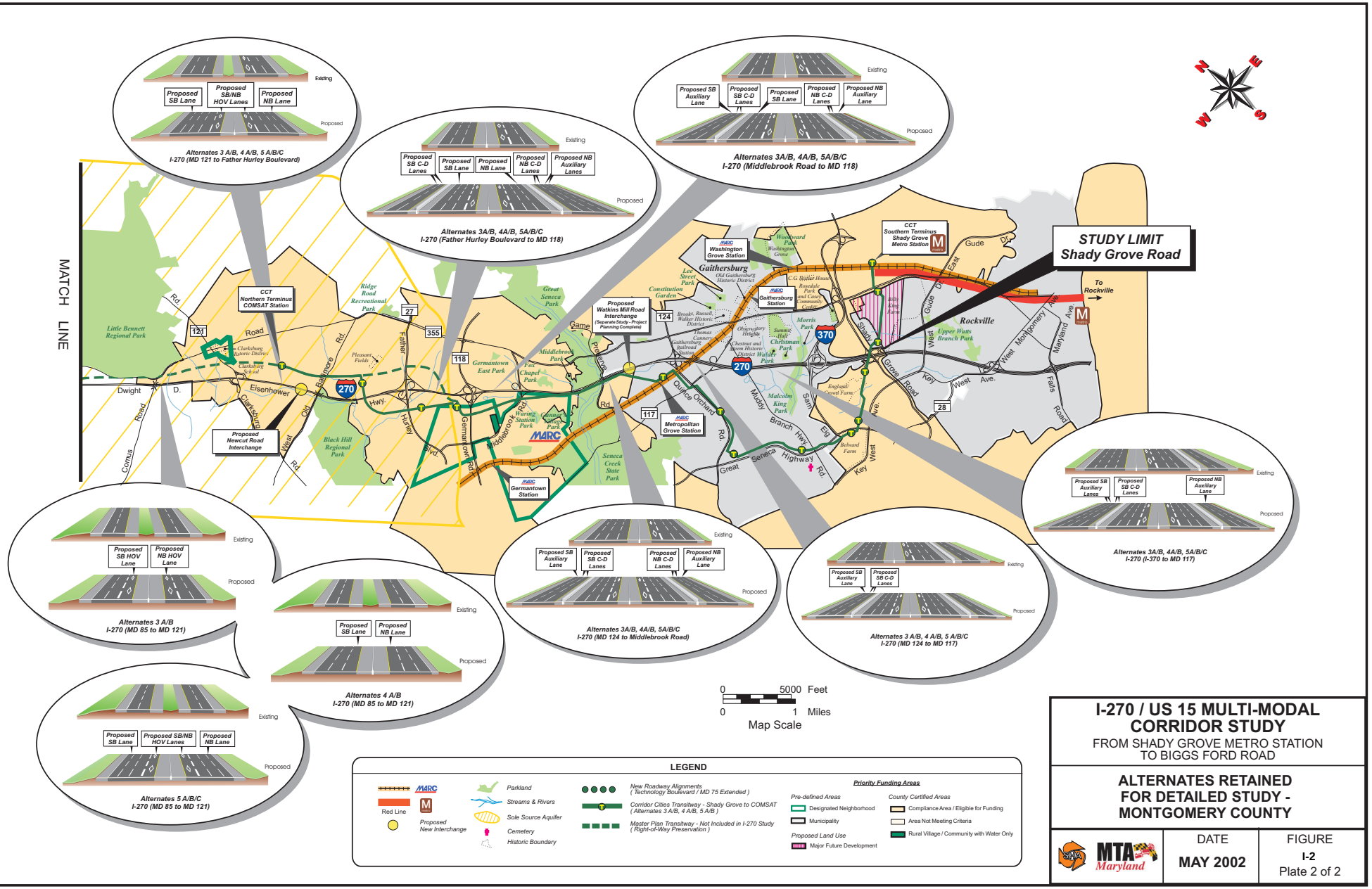
FROM SHADY GROVE METRO STATION TO BIGGS FORD ROAD

ALTERNATES RETAINED FOR DETAILED STUDY - FREDERICK COUNTY

MTA Maryland

DATE
MAY 2002

FIGURE
I-2
Plate 1 of 2



I-270 / US 15 MULTI-MODAL CORRIDOR STUDY

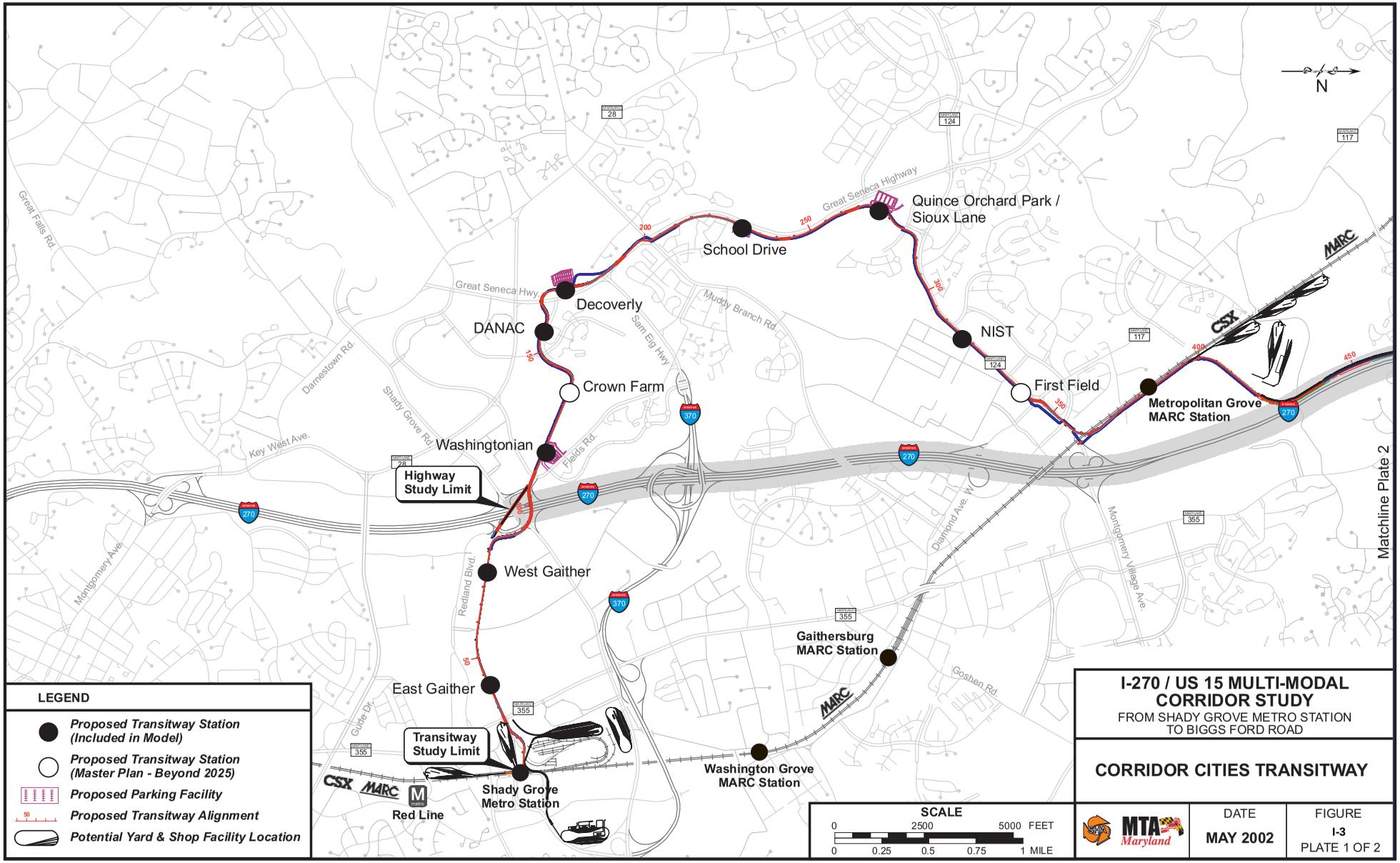
FROM SHADY GROVE METRO STATION TO BIGGS FORD ROAD

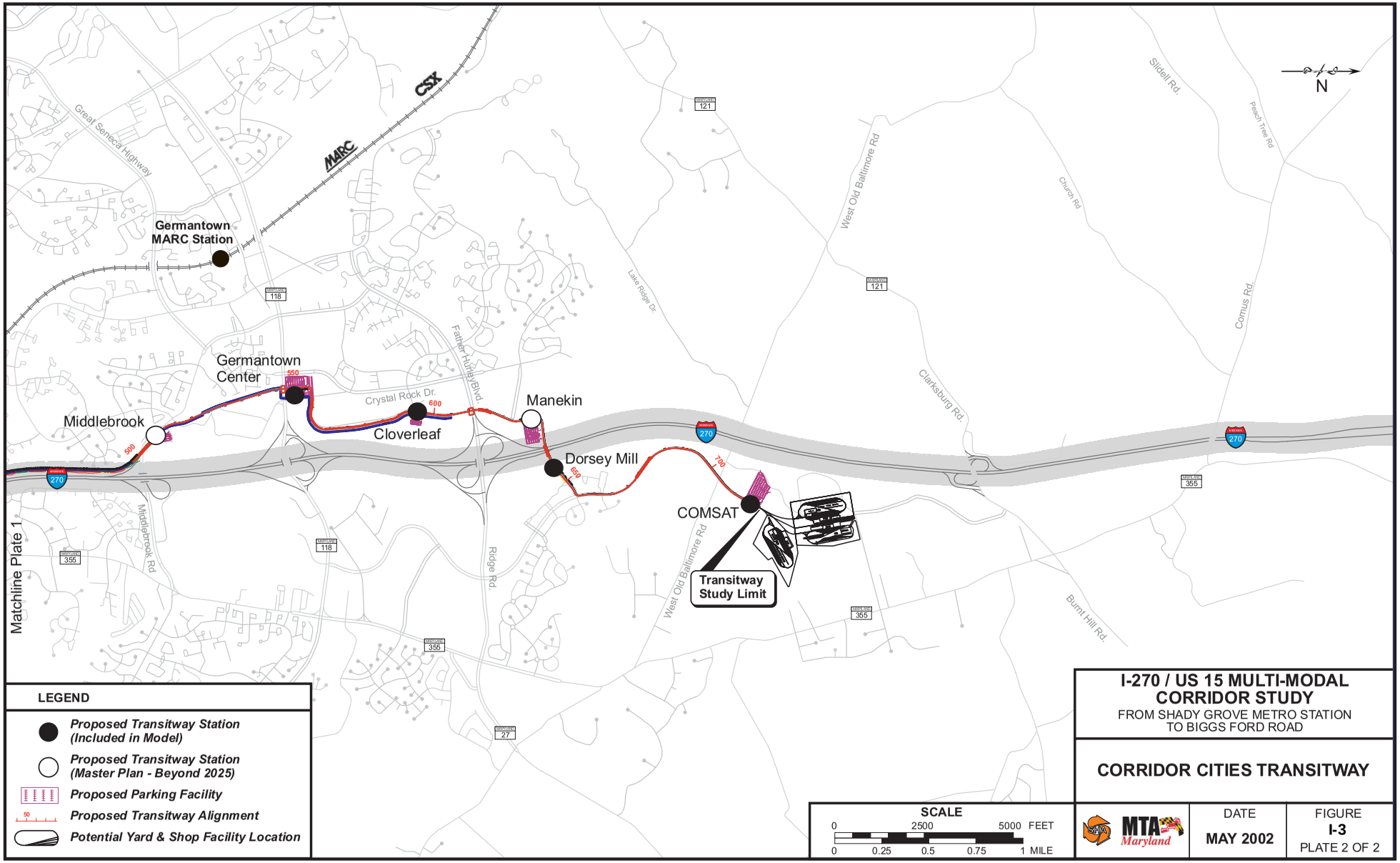
ALTERNATES RETAINED FOR DETAILED STUDY - MONTGOMERY COUNTY

MTA Maryland

DATE
MAY 2002

FIGURE
I-2
Plate 2 of 2


N
Great Seneca Highway
Quince Orchard Park / Sioux Lane
School Drive
Great Seneca Hwy.
Decoverly
DANAC
Crown Farm
Washingtonian
Highway Study Limit
West Gaither
East Gaither
Transitway Study Limit
Shady Grove Metro Station
Red Line
Washington Grove MARC Station
Gaithersburg MARC Station
NIST
First Field
Metropolitan Grove MARC Station
Muddy Branch Rd.
Sam Eig Hwy
Damestown Rd.
Shady Grove Rd.
Key West Ave.
Fields Rd.
Redland Blvd.
Diamond Ave. W.
Montgomery Village Ave.
Goshen Rd.
Gude Dr.
Great Falls Rd.
Montgomery Ave.
Matchline Plate 2
LEGEND
Proposed Transitway Station (Included in Model)
Proposed Transitway Station (Master Plan - Beyond 2025)
Proposed Parking Facility
Proposed Transitway Alignment
Potential Yard & Shop Facility Location
SCALE
0 2500 5000 FEET
0 0.25 0.5 0.75 1 MILE
I-270 / US 15 MULTI-MODAL CORRIDOR STUDY
FROM SHADY GROVE METRO STATION TO BIGGS FORD ROAD
CORRIDOR CITIES TRANSITWAY
MTA Maryland
DATE
MAY 2002
FIGURE
I-3
PLATE 1 OF 2



I-270 / US 15 MULTI-MODAL CORRIDOR STUDY

FROM SHADY GROVE METRO STATION TO BIGGS FORD ROAD

CORRIDOR CITIES TRANSITWAY

MTA Maryland

DATE: MAY 2002

FIGURE: I-3

PLATE 2 OF 2

- From MD 85 to I-70, I-270 would have two GP lanes and one HOV lane in each direction, with GP lanes separated from HOV lanes by striping. An auxiliary lane would be provided in the southbound direction, while a barrier-separated, three-lane ramp to I-70 would be provided in the northbound direction.
- Between I-70 and Biggs Ford Road, US 15 would have three GP lanes in each direction. An auxiliary lane would extend in both directions between Jefferson Street and MD 26.

Ramps providing direct access to the HOV lanes would be provided at the proposed Newcut Road and Watkins Mill Road interchanges to facilitate movements by buses and autos to transit stations at COMSAT and Metropolitan Grove.

New interchanges are proposed at I-270/Newcut Road, I-270/MD 75 Extended, US 15/ Trading Lane (now Monocacy Boulevard/Christopher's Crossing), and at US 15/Biggs Ford Road. Existing interchanges will be modified to accommodate all traffic movements and the improved highway section. Three park and ride lots are included in Alternatives 3A/B, located at US 15/MD 26, US 15/Monocacy Boulevard, and US 15/Biggs Ford Road.

The transit component of Alternatives 3A and 3B would provide either LRT or BRT on the CCT. Thirteen new station locations were initially identified for construction to service employment and mixed-use centers, with a proposed combined parking capacity of 4,500 to 5,150 spaces. Four additional future station locations were identified. Station locations include: Shady Grove Metrorail (existing station with over 5,800 parking spaces), East Gaither, West Gaither, Washingtonian, Crown Farm (future station), DANAC, Decoverly, School Drive *(dropped from consideration in 2007 due to property development)*, Quince Orchard Park/Sioux Lane, NIST, First Field (future station), Metropolitan Grove, Middlebrook (future station), Germantown Center, Cloverleaf, Manekin (future station), Dorsey Mill, and COMSAT.

An O&M facility for servicing light rail or bus rapid transit vehicles would be located in one of three identified areas: Shady Grove, Metropolitan Grove, or COMSAT. A shared use hiker/biker trail would also be constructed adjacent to the CCT.

Alternatives 4A and 4B

Alternatives 4A and 4B would add GP lanes, HOV lanes, auxiliary lanes, and direct access ramps along I-270 and GP lanes and auxiliary lanes along US 15. Alternative 4A would provide LRT on the CCT from Shady Grove to COMSAT, while Alternative 4B would provide BRT service on the CCT. Alternatives 4A/B are shown on ***Figures I-2*** and ***I-3*** and can be reviewed in detail in the 2002 DEIS in Volume 2, Chapter XI.

The highway component of Alternatives 4A/B would be the same for I-270 and US 15 as it is in Alternatives 3A/B, except for the section between MD 121 and MD 85. From MD 121 to MD 85, Alternatives 4A/B would have three GP lanes in each direction instead of two.

The transit component for Alternatives 4A/B is identical to the transit component for Alternatives 3A/B.

Alternatives 5A, 5B and 5C

Alternatives 5A, 5B, and 5C would add GP lanes, HOV lanes, auxiliary lanes, and direct access ramps along I-270 and GP lanes and auxiliary lanes along US 15. The highway component would be the same as Alternatives 3A/B, except for the section between MD 121 and I-70.

- Between MD 121 and MD 85, Alternative 5 would have three GP lanes and one HOV lane in each direction, with GP lanes separated from HOV lanes by striping. The HOV lanes would terminate at the proposed direct access ramps to/from MD 85.
- Between MD 85 and I-70, I-270 would have four GP lanes in each direction. An auxiliary lane would be provided in the southbound direction, while a barrier-separated, three-lane ramp to I-70 would be provided in the northbound direction.

Direct access ramps to HOV lanes would be provided at the proposed Watkins Mill Road (a separate SHA planning effort) and Newcut Road interchanges, as well as at the I-370, MD 118 and MD 85 interchanges.

Alternative 5A would provide LRT on the CCT from Shady Grove to COMSAT, while Alternative 5B would provide BRT service on the CCT. Alternative 5C would replace the CCT with Premium Bus service operating on the highway HOV lanes. Alternatives 5A/B/C are shown on ***Figures I-2*** and ***I-3*** and can be reviewed in detail in the 2002 DEIS In Volume 2, Chapter XI.

b. New Alternatives Being Evaluated in the EA

This Section 4(f) Evaluation has been prepared to analyze the AA/EA Alternatives 6A/B and 7A/B. An AA is used by FTA to evaluate the costs and benefits of a range of transportation alternatives to make an informed selection of a preferred transit mode and alignment. The EA is used to evaluate the environmental impacts of the proposed highway and transit improvements of the alternatives and to make an informed selection of a Locally Preferred Alternative. The alternatives being evaluated by the AA and EA are shown in ***Table II-2*****.** Seven alternatives are listed, and six of these meet the FTA guidelines for an AA. Two alternatives, Alternative 6.1: No-Build Transit and Alternative 6.2: Transit TSM, are included solely for the assessment of transit performance and are not evaluated for resource impacts. Four alternatives, Alternatives 6A, 6B, 7A and 7B, are being evaluated for resource impacts in this document. Alternatives 6A/B and 7A/B include ETLs instead of HOV lanes as the managed lane component, plus the LRT or BRT transit mode on the CCT as the transit component. Alternative 1: No-Build is carried forward from the 2002 DEIS and is updated to reflect the latest demographic forecasts from the Metropolitan Washington Council of Governments (MWCOG) and the latest planned transportation improvements in the MWCOG Constrained Long Range Plan (CLRP).

Table I-3: Alternatives Considered in the EA or AA

Alternative	Description	AA or EA
1: No-Build	No-Build Alternative carried from 2002 DEIS; includes latest Metropolitan Planning Organization (MPO) demographic forecasts	EA
6: No-Build Transit	Master Plan[1] ETL Alternative 6; no transit improvements beyond CLRP (with CCT removed)	AA
6-TSM: Transit TSM	Master Plan[1] ETL Alternative 6; with Transit TSM (enhanced bus service)	AA
6A	Master Plan[1] ETL/LRT Alternative	AA and EA
6B	Master Plan[1] ETL/BRT Alternative	AA and EA
7A	Enhanced[2] Master Plan ETL/LRT Alternative	AA and EA
7B	Enhanced[2] Master Plan ETL/BRT Alternative	AA and EA

1 Master Plan refers to alignments along I-270 & US 15included in current Frederick and Montgomery County approved master plans.

2 Enhanced Master Plan refers to proposed improvements that are greater than called for in the Montgomery County Clarksburg Area Master Plan.

Alternatives 6A and 6B

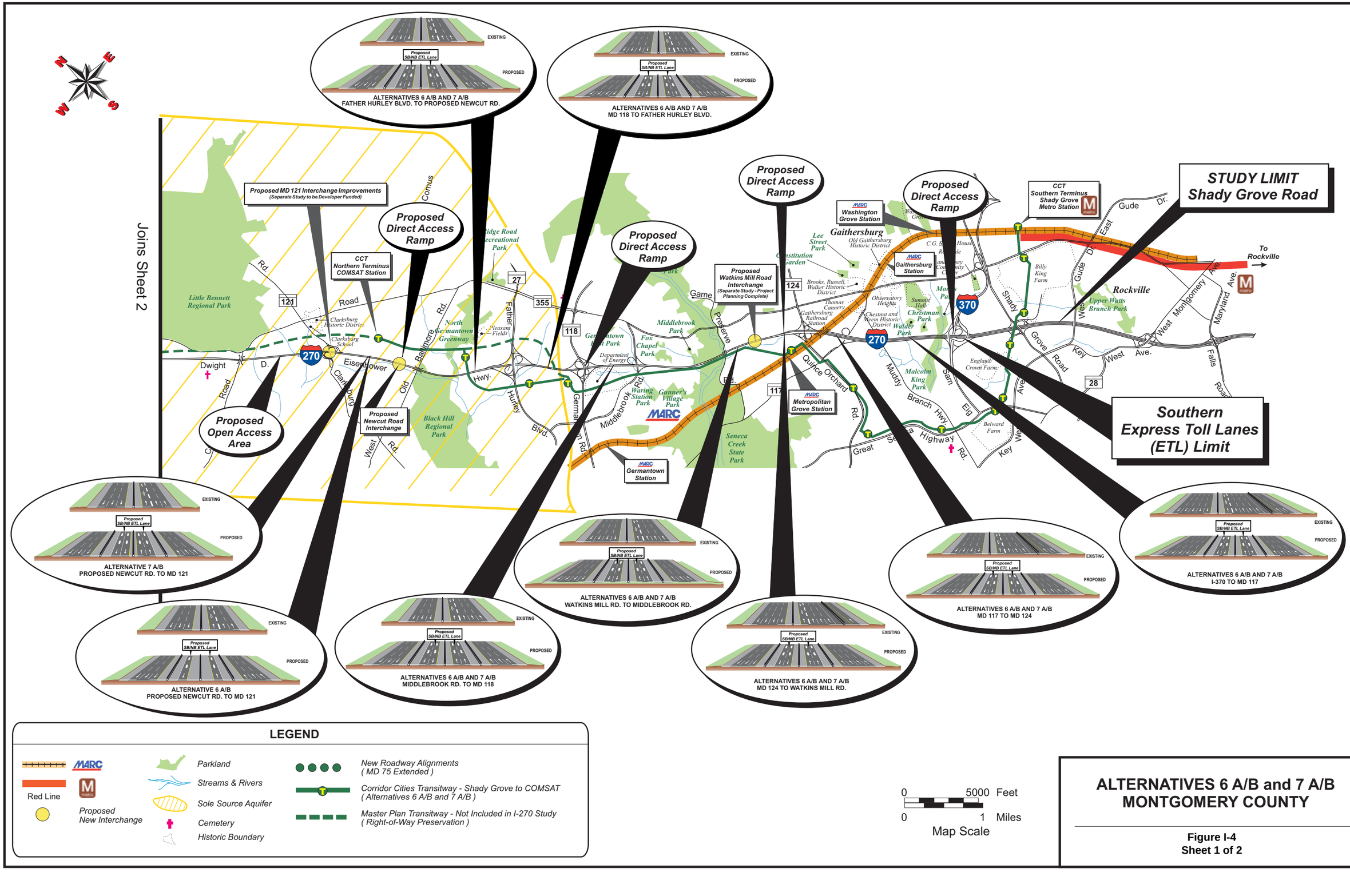
The highway component of Alternatives 6A and 6B would add GP lanes, ETLs, auxiliary lanes, and direct access ramps along I-270 and GP lanes and auxiliary lanes along US 15. ETLs would terminate north of MD 80 at the direct access ramps south of the Monocacy National Battlefield in Frederick County. Alternative 6A would provide LRT on the CCT from Shady Grove to COMSAT, while Alternative 6B would provide BRT service on the CCT. Alternatives 6A/B are shown on ***Figures I-4 (Sheets 1 and 2), I-5*** and ***I-6***.

Between I-370 and north of MD 80, Alternatives 6A and 6B would provide up to two ETLs in each direction in the median lanes, barrier-separated from highway GP lanes and served by direct access ramps at designated interchanges and open access areas. The highway component would provide:

- Four GP lanes and two ETLs each direction between Shady Grove Road and MD 124,
- Three GP lanes and two ETLs in each direction between MD 124 and proposed Newcut Road,
- Three GP lanes and one ETL in each direction between proposed Newcut Road and MD 121,
- Two GP lanes and one ETL in each direction between MD 121 and north of MD 80, where the ETLs will terminate in the vicinity of Park Mills Road , and
- Three GP lanes in each direction from north of MD 80 to Biggs Ford Road.

Auxiliary lanes would provide additional travel lanes between interchanges as needed to provide capacity. The typical sections are also shown on ***Figure I-4 (Sheets 1 and 2)***.

Direct access ramps for ETLs only would be provided south of I-370 and north of MD 80 at the ETL termini; at the interchanges of I-270 with I-370, MD 118, and proposed Newcut Road; from proposed Metropolitan Grove Road Extended; and via open access ramps between MD 121 and MD 109 and between MD 75 and MD 80.



LEGEND

- Red Line
- MARC
- Proposed New Interchange
- Parkland
- Streams & Rivers
- Sole Source Aquifer
- Cemetery
- Historic Boundary
- New Roadway Alignments (MD 75 Extended)
- Corridor Cities Transitway - Shady Grove to COMSAT (Alternatives 6 A/B and 7 A/B)
- Master Plan Transitway - Not Included in I-270 Study (Right-of-Way Preservation)

0 5000 Feet
0 1 Miles
Map Scale

ALTERNATIVES 6 A/B and 7 A/B
MONTGOMERY COUNTY

Figure I-4
Sheet 1 of 2

STUDY LIMIT
Biggs Ford Road

To Thurmont Emmitsburg

Proposed Biggs Ford Road Interchange

Biggs Ford Rd.

Birely-Roelkey Farmstead

15

Monocacy Creek

Tuscarora Knolls

Tuscarora

Willow Rd

Monocacy Blvd.

Spring Bank

Wormans Mill Rd.

Hayward Rd.

Meadows Park

Lambert

26

Opossumtown Pike

194

To Libertytown

River

Proposed Monocacy Blvd. Interchange (Separate Planning Study)

Proposed MD 26 Interchange Improvements (Separate Study - Under Construction)

Fredericktowne Village Park

Rose Hill Manor Park

Rose Hill Manor Park / Museum

Frederick

Market St.

Motter Ave.

Little League Park

Staley Park

College Estates Park

7th St.

Max Kehne Memorial Park

Rosedale Park

Apple Park

Carroll Baker Park

Schifferstadt

Rosemont Ave

Waterford Park

Rock Creek Park

Patrick St.

15

144

Jefferson St.

Maryvale Park

Mt. Olivet Cemetery

Linden Grove

Linden Hills Park

40

70

To Hagerstown

180

15

340

To Brunswick Point of Rocks

Guilford

85

355

New

270

Design

Rd.

Proposed MD 85 Interchange Improvements

Buckeystown Pike

MARC Frederick Station

MARC Monocacy Station

MARC Frederick Service

Monocacy National Battlefield

Monocacy National Battlefield (National Historic Landmark)

J.C. Motter S.C. Simmons House

Hoke / Grove Lime Kiln Property

City of Frederick Historic District

CSX TRANSPORTATION

To Baltimore

70

40

River

Monocacy

Baker Valley

Fingerboard Rd.

80

Mills Rd.

Park

National Pike

Washington

Urbana

Pike

F. Mantz Farmstead

Northern Express Toll Lanes (ETL) Limit

MD 355 Relocated (By Others)

Proposed Open Access Area

Big Woods

Stancioff House

Urbana Historic District

Urbana District Park

Dr. Perry House

William Tabler House

Doctor Perry Rd.

Urbana Community Park

Urbana Lake Fish Management Area

Proposed MD 75 Interchange

Green Valley Rd.

75

Proposed MD 75 Extended

Little Bennett Regional Park

Hyattstown Historic District

FREDERICK COUNTY

MONTGOMERY COUNTY

Little Bennett Creek

109

Proposed Open Access Area

Joins Sheet 1

ALTERNATIVES 6 A/B, 7 A/B
I-270 (I-70 to MD 85)
Existing
Proposed SB AUX
Proposed SB Lanes
Proposed NB Lanes
Proposed

Alternates 6 A/B
I-270 (North of MD 80 to MD 85)
Existing
Proposed SB/NB Lanes
Proposed

Alternates 7 A/B
I-270 (North of MD 80 to MD 85)
Existing
Proposed SB/NB Lanes
Proposed

Alternates 3 A/B, 4 A/B, 5 A/B/C, 6 A/B, 7 A/B
US 15 (Biggs Ford Road to Trading Lane)
Existing
Proposed SB Lane
Proposed NB Lane
Proposed

Alternates 3 A/B, 4 A/B, 5 A/B/C, 6 A/B, 7 A/B
US 15 (Trading Lane to MD 26)
Existing
Proposed SB Lane
Proposed NB Lane
Proposed

Alternates 3 A/B, 4 A/B, 5 A/B/C, 6 A/B, 7 A/B
US 15 (MD 26 to Jefferson Street)
Existing
Proposed SB/NB Lanes
Proposed NB Auxiliary Lane
Proposed

Alternates 3 A/B, 4 A/B, 5 A/B/C, 6 A/B, 7 A/B
US 15 (Jefferson Street to I-70)
Existing
Proposed SB/NB Lanes
Proposed

ALTERNATIVE 6 A/B
MD 121 TO ETL TERMINUS (NORTH OF MD 80)
Existing
Proposed SB/NB ETL
Proposed

ALTERNATIVE 7 A/B
MD 121 TO ETL TERMINUS (NORTH OF MD 80)
Existing
Proposed SB/NB ETL
Proposed

LEGEND

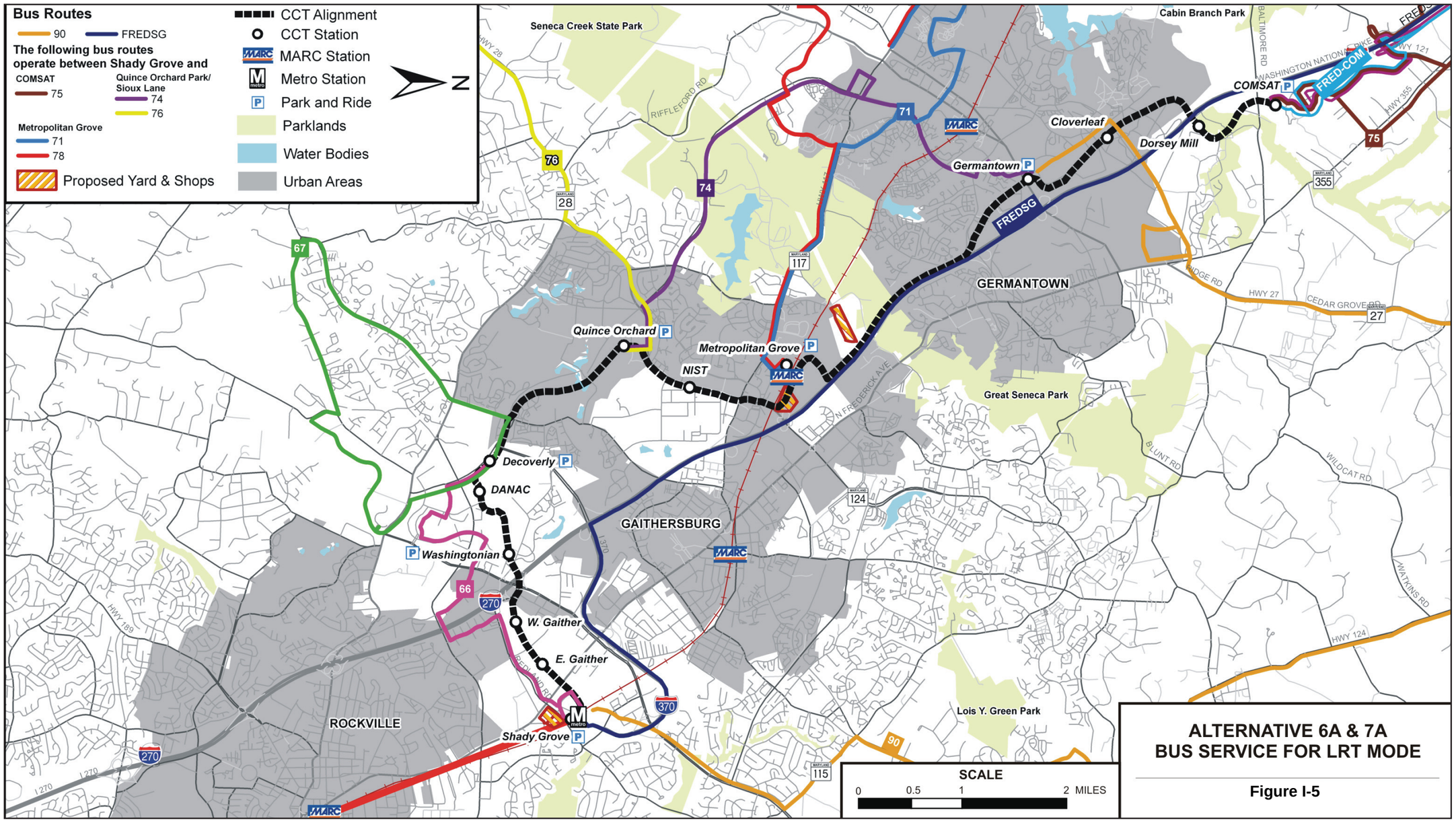
- Red Line
- MARC
- Metro
- Proposed New Interchange
- Parkland
- Streams & Rivers
- Sole Source Aquifer
- Cemetery
- Historic Boundary
- New Roadway Alignments (MD 75 Extended)
- Corridor Cities Transitway - Shady Grove to COMSAT (Alternatives 6 A/B and 7 A/B)
- Master Plan Transitway - Not Included in I-270 Study (Right-of-Way Preservation)

0 5000 Feet
0 1 Miles
Map Scale

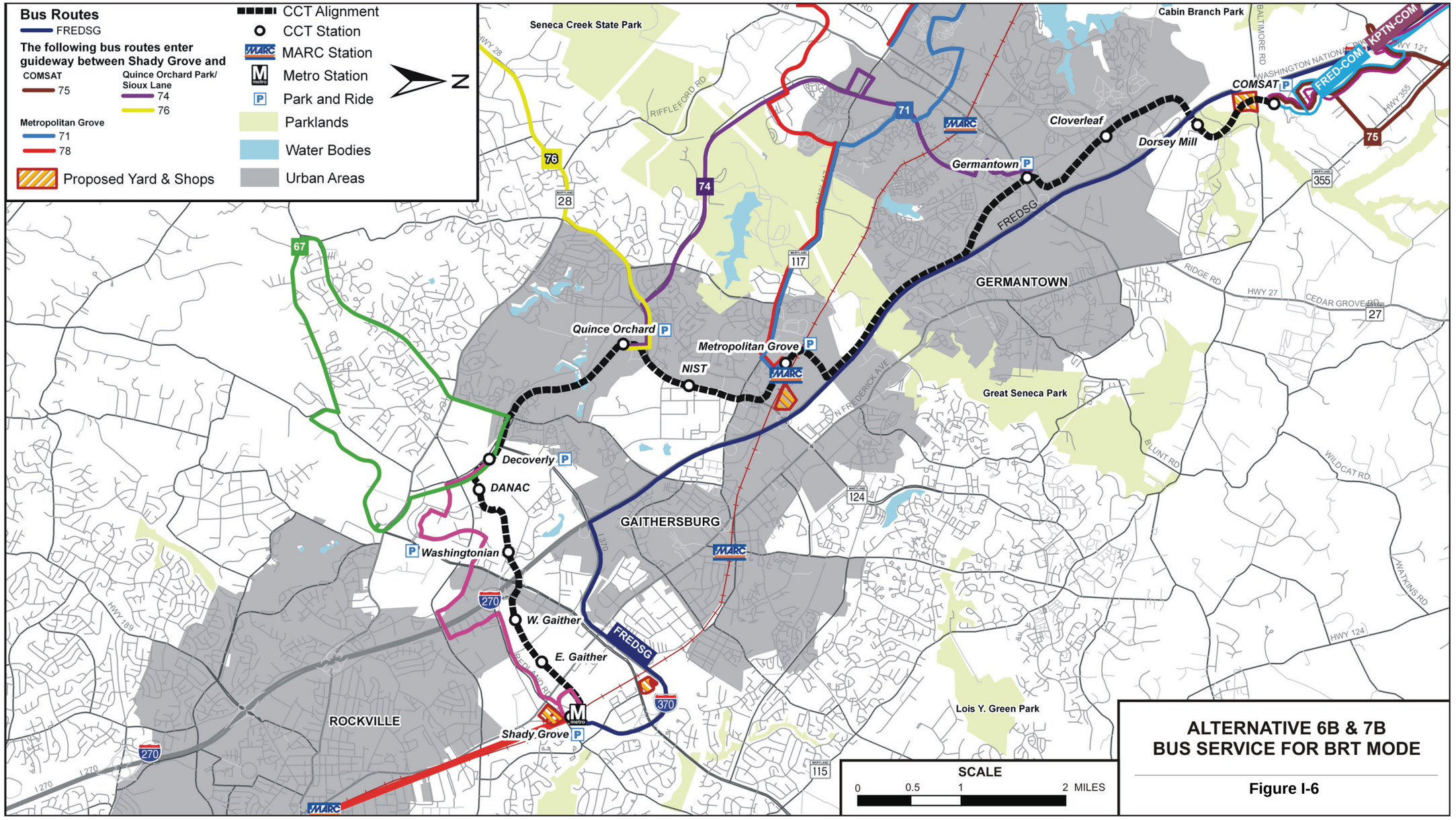
ALTERNATIVES 6 A/B and 7 A/B
FREDERICK COUNTY

Figure I-4
Sheet 2 of 2

Alternatives 6A & 7A Bus Service for LRT Mode



Alternatives 6B & 7B Bus Service for LRT Mode



ALTERNATIVE 6B & 7B
BUS SERVICE FOR BRT MODE

Figure I-6

New interchanges are proposed at I-270/Newcut Road, I-270/MD 75 Extended, and at US 15/Biggs Ford Road. Existing interchanges will be modified to accommodate all traffic movements and the improved highway section. Two interchanges, at I-270/Watkins Mill Road and at US 15/Monocacy Boulevard/Christopher's Crossing, are being developed by SHA as separate planning projects that should accommodate future changes in the I-270/US 15 roadway. One park and ride lot at US 15 and Biggs Ford Road is included in Alternatives 6A and 6B.

The transit component of Alternatives 6A and 6B would provide either light rail or bus rapid transit on the CCT. Twelve new station locations were identified for initial construction to service employment and mixed-use centers, with a proposed combined parking capacity of 4,700 spaces. Four additional future station locations were identified. Station locations include: Shady Grove Metrorail (existing station with over 5,800 parking spaces), East Gaither, West Gaither, Washingtonian, Crown Farm (future station), DANAC, Decoverly, Quince Orchard, NIST, First Field (future station), Metropolitan Grove, Middlebrook (future station), Germantown Center, Cloverleaf , Manekin (future station), Dorsey Mill, and COMSAT.

In addition to transit service on the CCT, transit measures include the following:

- New feeder bus routes to serve the CCT stations
- New premium bus routes from Frederick County serving major activity centers
- Park and ride facilities at key CCT stations
- Interactive transit information at major employment centers in the Corridor and at CCT stations

In addition to BRT or LRT service, Alternatives 6A and 6B will include Premium Bus service between Frederick County and corridor park and ride lots, major activity centers, and transit stations operating on the managed lanes of I-270. These include the FREDSG, FREDMGSG and KPTNMGSG routes that also appear in Alternative 6.2: Transit TSM.

An Operations and Maintenance (O&M) facility for servicing light rail or bus vehicles would be located in one of three identified areas: Shady Grove, Metropolitan Grove, or COMSAT. A shared use hiker/biker trail would also be constructed adjacent to the CCT.

Alternatives 7A and 7B

Alternatives 7A and 7B would add GP lanes, ETLs, auxiliary lanes, and direct access ramps along I-270 and GP lanes and auxiliary lanes along US 15. ETLs would terminate north of MD 80 at the direct access ramps south of the Monocacy National Battlefield in Frederick County. Alternative 7A would provide LRT on the CCT from Shady Grove to COMSAT, while Alternative 7B would provide BRT service on the CCT. Alternatives 7A/B are shown on ***Figures I-4 (Sheets 1 and 2), I-5*** and ***I-6***.

The highway typical section for Alternatives 7A/B is identical to the section for Alternatives 6A/B except between MD 121 and north of MD 80. In this section, Alternatives 7A/B would have two ETLs per direction, with a four-foot inside offset to the median barrier.

The transit component of Alternatives 7A and 7B is identical to the transit component of Alternatives 6A and 6B.

Alternative 6.1: No-Build Transit

The highway component of the No-Build Transit Alternative is identical to the highway improvements in Alternative 6A/B. The highway build is included as part of the No-Build Transit Alternative to facilitate the analysis of the transit alternatives. By using an identical highway network baseline in the travel demand modeling of the No-Build Transit, Transit TSM, and transit build alternatives, the analysis is able to isolate the benefits attributable solely to the transit components, without having to compensate for changes in the underlying traffic patterns.

The transit component of Alternative 6.1: No-Build Transit consists of the existing transit services in the corridor plus any improvements programmed in the fiscally constrained long-range transportation plan for the Metropolitan Washington Region. ***Table II-4*** summarizes the routes, termini, and frequency of transit services in Montgomery and Frederick Counties for the No-Build Transit Alternative.

Alternative 6.2: Transit TSM

The Transit TSM Alternative (***Figure I-7***) serves as the baseline for analyzing transportation performance among the transit alternatives, as required by the FTA. The Transit TSM Alternative represents the best transit service that can be achieved for the purposes of meeting the project Purpose and Need without investing in major capital improvements, such as the construction of an LRT or BRT fixed guideway. The Transit TSM Alternative is designed to provide comparable quality and levels of transit service at lower cost that Alternatives 6A/B, without major investment in a transit fixed guideway and using the same assumptions for the highway network as Alternatives 6A/B. Alternative 6.2 includes the operation of high quality transit service to a comparable level as the CCT, but without the construction of the exclusive transitway.

The highway component of Alternative 6.2 is identical to the highway improvements in Alternative 6A/B. The highway build is included in Alternative 6.2 to isolate the transit improvements and determine the benefits attributable solely to the transit components.

The transit TSM measures in this alternative include the following:

- New Premium Bus service operating on local roads and serving stops comparable to CCT transit stations
- New stations and park and ride facilities in the same locations as proposed for Alternatives 6A and 6B
- Premium bus service from Frederick County to major activity centers using managed lanes with direct access ramps to park and ride lots, major activity centers and transit stations.
- Enhanced feeder bus service to Metrorail and MARC stations
- Interactive transit information at major employment centers in the Corridor.

Table I-5: 2030 No-Build Transit Service

Route	Current Terminals		2006 Headways		Notes	Proposed 2030 No-Build Headways	
	Start	End	Peak	Off-Peak		Peak	Off-Peak
43	Travillah Transit Center	Shady Grove	15	20		15	20
54	Lake Forest	Rockville	20	30		15	30
55	Germantown Transit Center	Rockville	15	30		10	20
56	Lake Forest	Rockville	20	30		15	30
61	Germantown Transit Center	Shady Grove	30	30		15	30
63	Shady Grove	Rockville	30	30		20	30
66	Travillah Transit Center	Shady Grove	30	-	off-peak dir only	20	30
67	Travillah Transit Center	Shady Grove	30	-	peak direction only	20	30
70	Milestone	Bethesda Medical Center	15	-	not all stops	15	
71	Kingview Park and Ride	Shady Grove	30	-	peak direction only	20	
74	Germantown Transit Center	Shady Grove	30	30		20	30
75	Urbana	Germantown Transit Center	30	30	not all stops in off-peak	20	30
76	Poolesville	Shady Grove	30	-	not all stops in off-peak	20	30
78	Kingview P&R	Shady Grove	30	-	peak direction only	20	-
79	Milestone	Shady Grove	30	-	peak direction only	20	-
82	Clarksburg	Germantown Transit Center/DOE	30	-	peak direction only	20	-
83	Milestone	Germantown Transit Center	15	30	MARC station in peak	15	30
90	Milestone	Shady Grove	30	30	different routes throughout day	20	30
97	Germantown Transit Center	Germantown MARC	15	30	loop	15	30
98	Germantown Transit Center	Seabreeze Court	15	30	loop	15	30
100	Germantown Transit Center	Shady Grove	5	15	express via I-270	5	15
124	MD 124 Park and Ride (MD 117 Park and Ride)	Shady Grove	30	-	express via I-270	20	-
MTA 991	Hagerstown	Shady Grove/Rock Spring Park	15	-		15	-
FT10	Frederick Towne Mall	Francis Scott Key Mall	30	40		30	40
FT20	Francis Scott Key Mall	Frederick Transit Center	30	60		30	60
FT30	Frederick Towne Mall	Frederick Transit Center	30	60	loop	30	60
FT40	Frederick Towne Mall	Frederick Transit Center	30	60		30	60
FT50	Frederick Towne Mall	Frederick Transit Center	30	60	loop	30	60
FT60	Frederick Community College	Frederick Transit Center	30	60	loop	30	60
FT70	College Park Plaza	Frederick Transit Center	60	60	loop	60	60
FT80	Frederick Community College	Frederick Towne Mall	30	60		30	60
FT-EC Shuttle	Spring Ridge Apartments	Department of Aging			4 round trips/day		
FT-BJ Shuttle	Frederick Transit Center	Brunswick MARC Station	180	-	4 round trips/day	180	-
FT-ET Shuttle	Emmitsburg	Frederick Transit Center	120	-	2 round trips/day	120	-
FT-85 Shuttle	Bowmans Industrial Park	Frederick Transit Center			2 round trips/day		
FT-POR Shuttle	Frederick Shopping Center	Point of Rocks MARC Station	40		peak direction only	40	
FT-Fd/ MARC Shuttle	Frederick Towne Mall	Frederick Transit Center	60	-	peak direction only	60	-
FT-Walk/ MARC Shuttle	Walkersville	Frederick Transit Center	60	-	peak direction only	60	-
FT-Walk Shuttle	Walkersville	Frederick Transit Center	60	120		60	120

The primary improvement in Alternative 6.2 is the construction of new station facilities that are connected via a new limited stop bus route between the Shady Grove Metrorail station and COMSAT. This bus route would operate on existing streets at a peak headway of six minutes (busiest travel times) and a non-peak headway of 10 minutes. Headway is the interval of time between buses. In addition to the new limited stop bus route providing service to the proposed stations, new service is also proposed from Frederick County to the Shady Grove Metrorail station and to the CCT area in Gaithersburg. ***Table II-4*** describes the new bus routes, where they start and end, and their frequency of service for the Transit TSM Alternative.

Table II-4: 2030 Alternative 6.2 Additions to No-Build Transit Service

Route	Terminals		Proposed 2030 TSM Headways	
	Start	End	Peak	Off-Peak
FREDSG	Frederick Transit Center	Shady Grove	15	-
FREDMGSG	Frederick Transit Center	Shady Grove	20	30
KPTNMGSG	Kemptown	Shady Grove	30	-
COM-MGSG	COMSAT	Shady Grove	6	10

Alternative 6.2: Transit TSM Bus Service

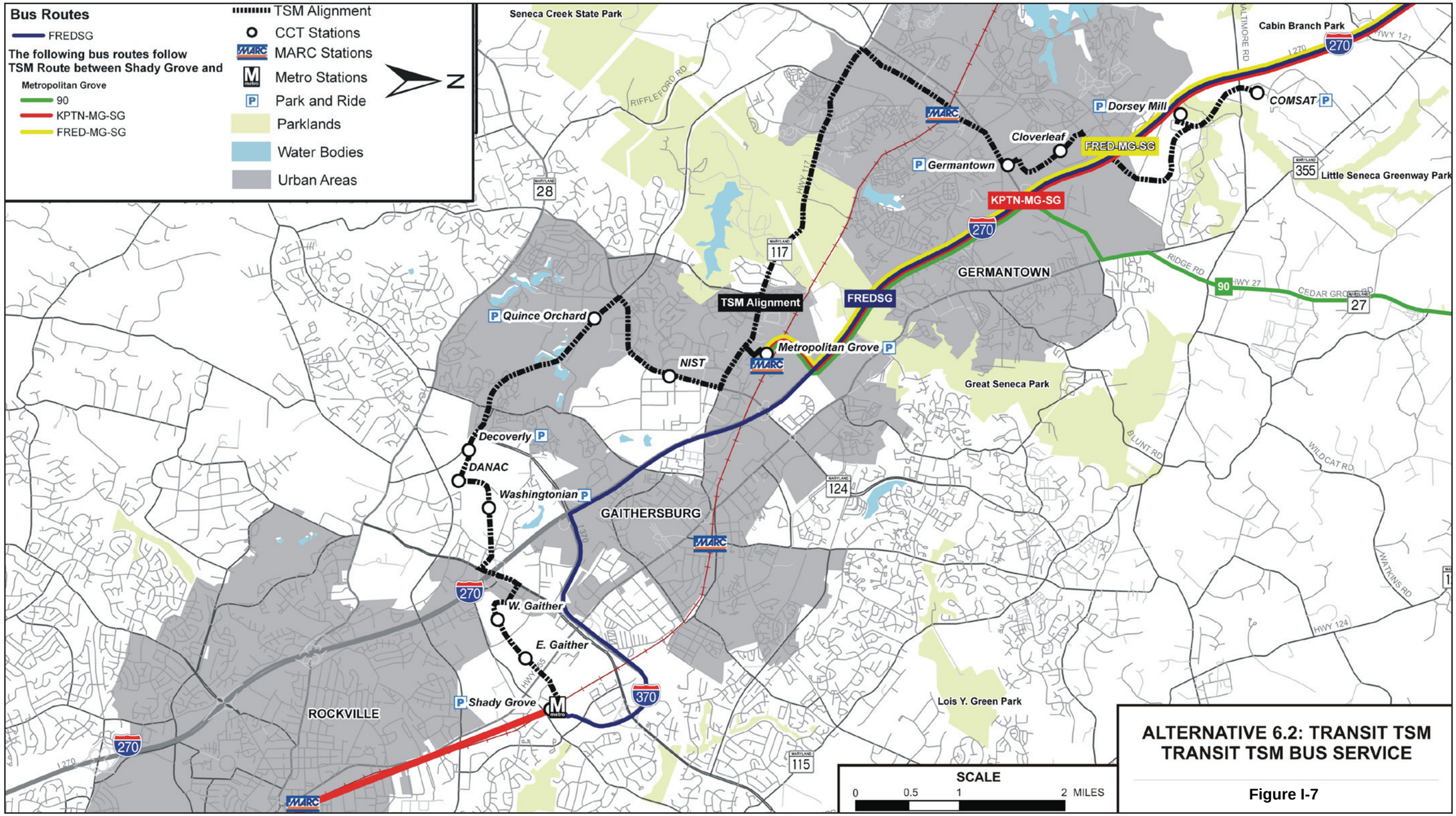


Figure I-7

II. SECTION 4(F) EVALUATION

A. DESCRIPTION OF SECTION 4(F) PROPERTIES

The No-Build Alternative 1 and the TSM/TDM Alternative 2 will not impact any public parks and recreation areas or any historic resources. Alternatives 6A/B and 7A/B would require right-of-way from 13 publicly-owned public parks and recreation areas and from seven historic properties.

1. Publicly-Owned Public Parks and Recreation Areas

The following publicly-owned public parks and recreation areas would be impacted by Alternatives 6A/B and 7A/B. A summary table (***Table II-1***) follows the descriptions of the parks/recreation areas and identifies the parks in the study area from south to north. The location of each park is shown on ***Figure II-1***. The park locations are also shown on the Plan Sheets in the 2009 AA/EA.

a. Malcolm King Park

Malcolm King Park is located in eastern Gaithersburg, northwest of the I-270/I-370/Sam Eig Highway interchange (see ***Figure II-2***), adjacent to a multi-unit residential community. Malcolm King Park was established with funds from Program Open Space and is owned by the City of Gaithersburg. The park occupies 72.9 acres and is bordered on the north, south, and west by residential properties and on the east by I-270. The majority of this park acreage remains in its natural wooded state. Park amenities include one basketball court, a 1¼-mile hiker-biker trail, fitness trail, picnic tables, playgrounds, two tennis courts, and tot lots. Future plans call for extending the hiker-biker trail.

b. Morris Park

Morris Park is located in eastern Gaithersburg, northeast of the I-270/I-370/Sam Eig Highway interchange (see ***Figure II-2***), adjacent to the Summit Hall Elementary School and multi-use residential communities. Morris Park was established with funds from Program Open Space and is owned by the City of Gaithersburg. The park occupies 37.2 acres and is bordered on the east by Summit Hall Elementary School, by I-270 on the west, I-370 on the south, and Summit Hall Road on the north. Park amenities include a football/soccer field, basketball court, three tennis courts, two baseball fields, playground areas, picnic tables, and grills. No future plans for additional development of this park were identified.

c. Seneca Creek State Park

Seneca Creek State Park is located in Montgomery County between Gaithersburg and Germantown (see ***Figure II-3***) and is traversed by existing I-270. The park was established with funds from the Land and Water Conservation fund and Program Open Space. The 6,290 acre park is under the jurisdiction of the Maryland Department of Natural Resources (MDNR).

Section 4(f) Resources

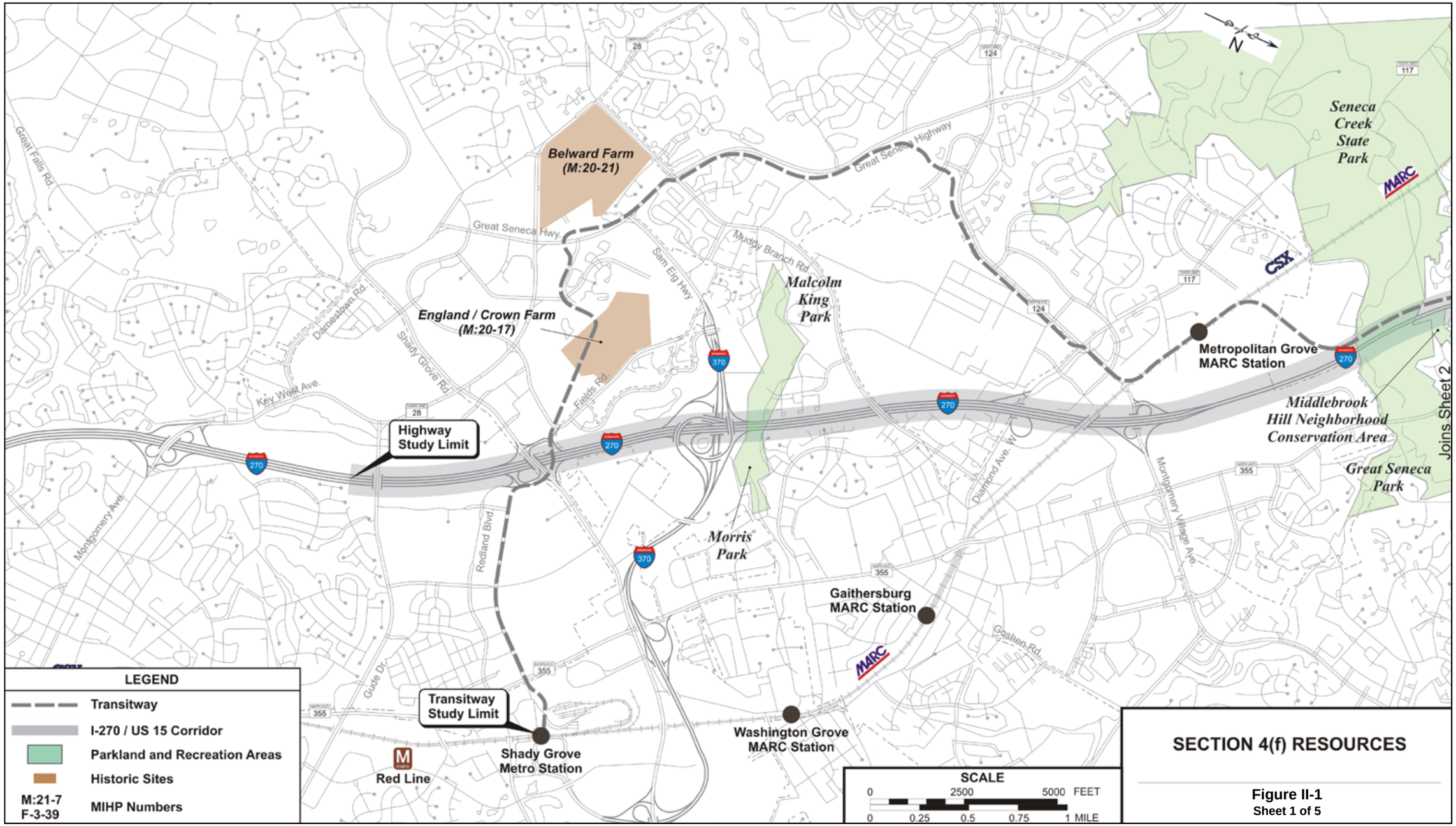


Figure II-1
Sheet 1 of 5

Section 4(f) Resources

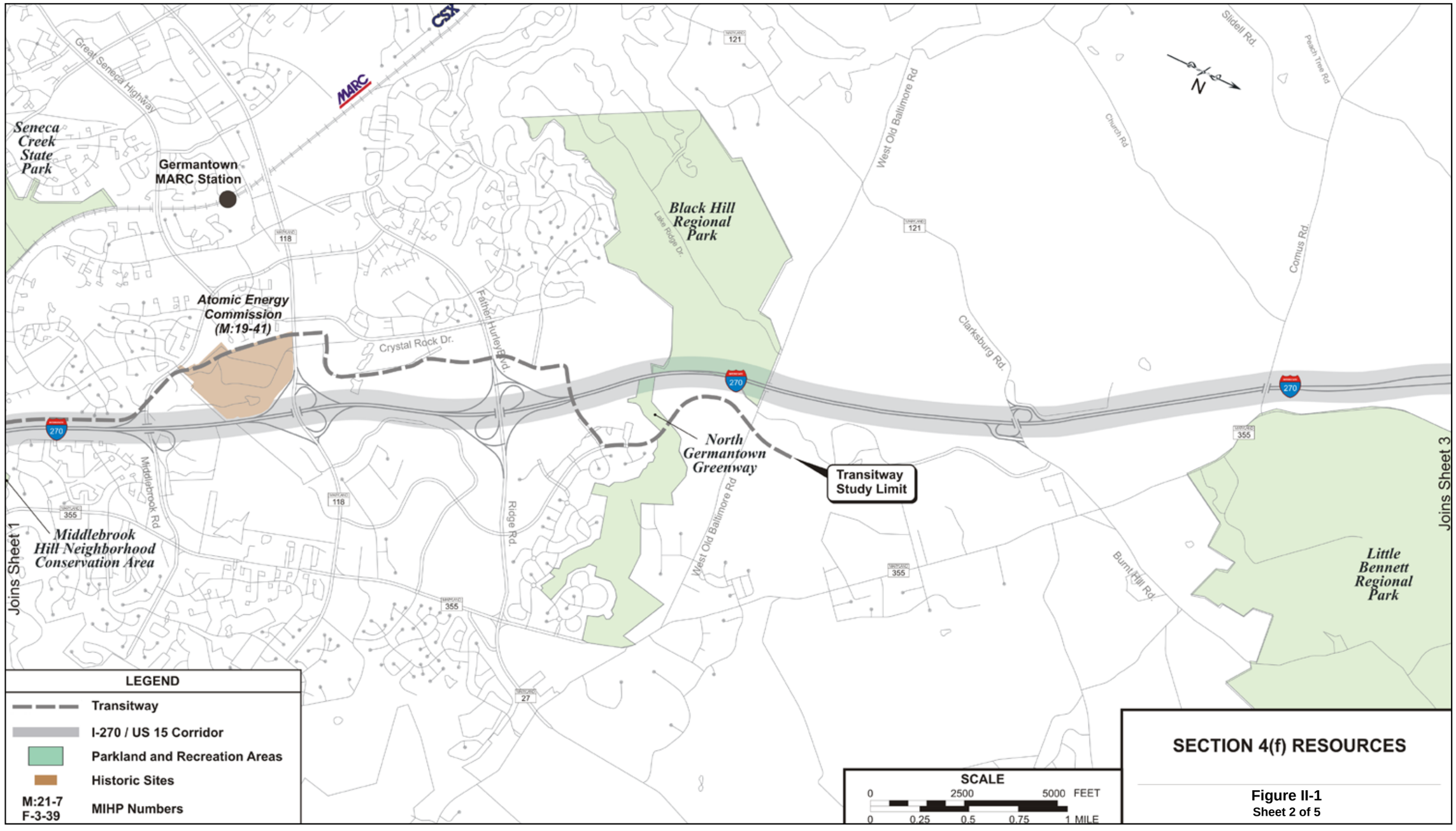


Figure II-1
Sheet 2 of 5

Section 4(f) Resources

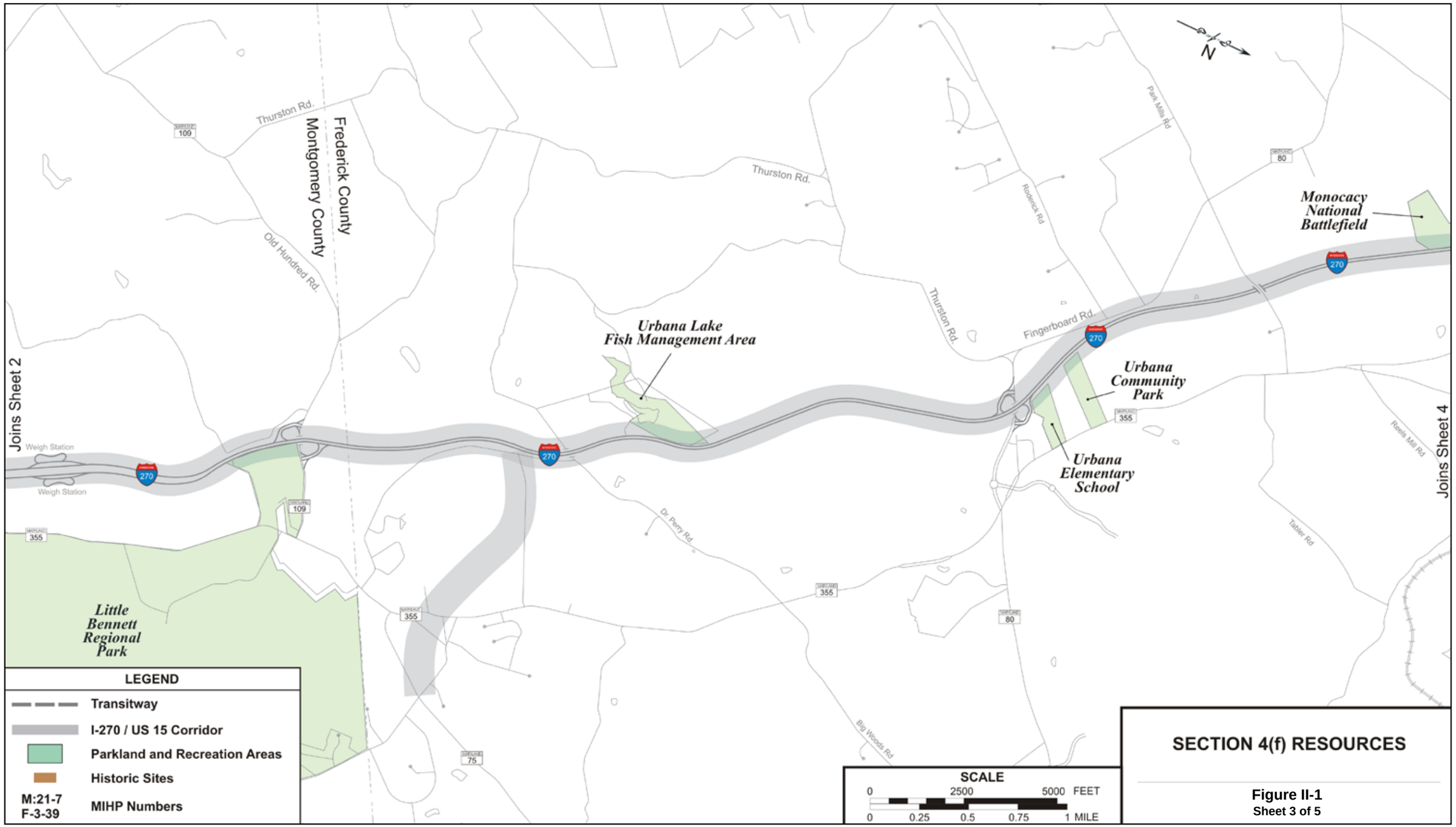
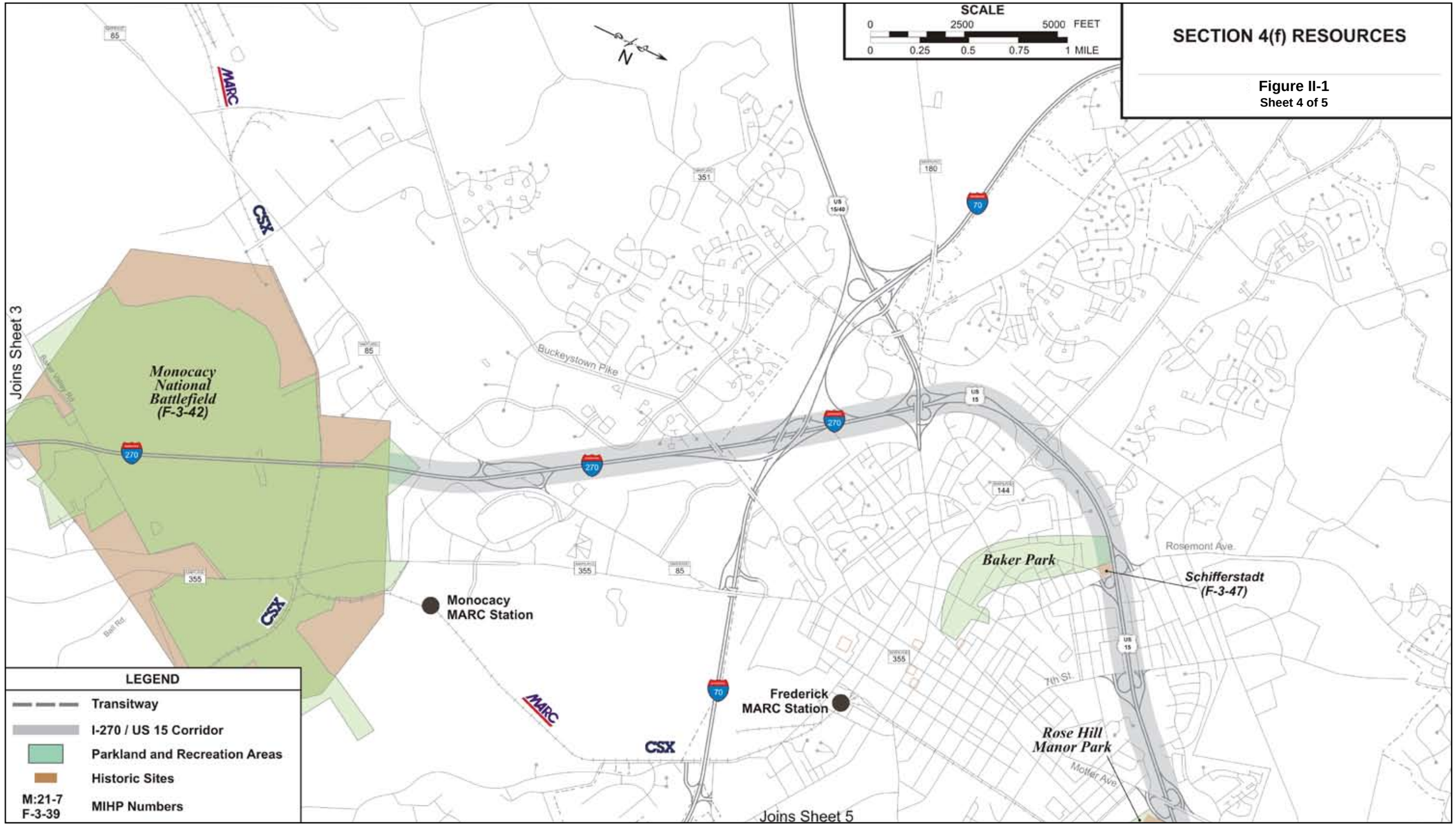
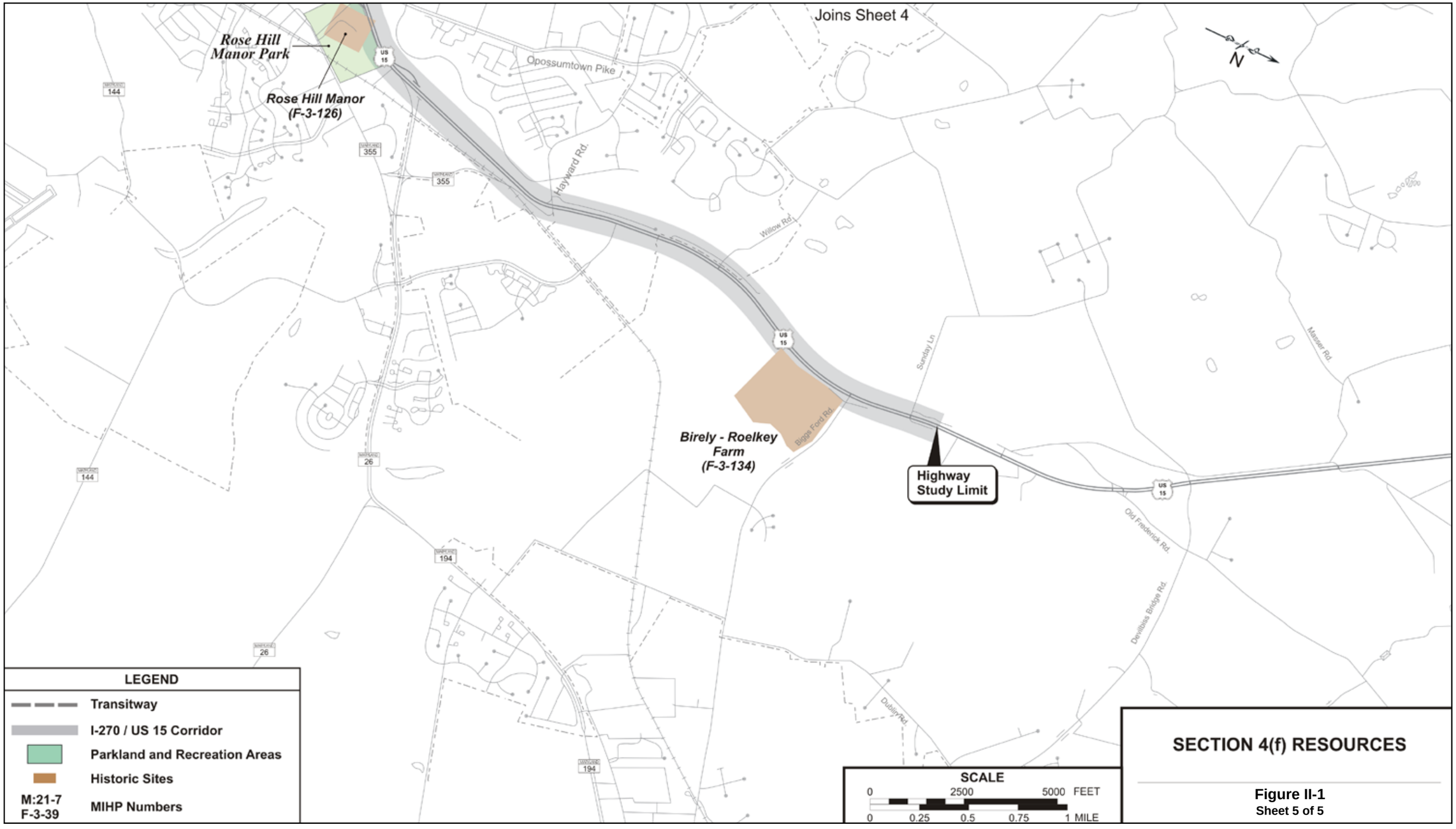


Figure II-1
Sheet 3 of 5

Section 4(f) Resources



Section 4(f) Resources



The park is bordered on the north by Schaeffer Road, South Germantown Recreational Park, open space and Clopper Road, to the south by open space and the Potomac River, to the east by open space, and the west by White Ground Road and open space. Park amenities include biking trails, boat rental, cross-country skiing, campfire programs, fishing, flat-water canoeing, hiking trails, hunting areas, a playground, a disc golf course, and riding trails. No future plans for additional development of this park were identified.

d. Middlebrook Hill Neighborhood Conservation Area

Middlebrook Hill Neighborhood Conservation Area is located in Montgomery County north of Seneca Creek State Park and adjacent to the existing I-270 corridor (see ***Figure II-3***). The Maryland-National Capital Parks and Planning Commission (M-NCPPC) owns the 11.5-acre park. This park was established with funds from Program Open Space. Staten Court, Rambling Road and High Point Drive lie to the park's north and east, and Abbottsford Circle lies northwest of the park. The park is a wooded, undeveloped parcel of land that is being managed as a conservation area and does not offer active recreational opportunities. Based on coordination with M-NCPPC, there are no future plans for the development of this park.

e. North Germantown Greenway

The North Germantown Greenway is a Stream Valley Park (SVP) located on several parcels of land between I-270 and Blunt Road in Montgomery County. The SVP is under the jurisdiction of M-NCPPC. The 300-acre park is located along portions of Little Seneca Creek east of I-270 between Father Hurley Boulevard and West Old Baltimore Road (see ***Figure II-4***), adjacent to Black Hill Regional Park. Coordination with M-NCPPC is ongoing to ascertain the funding source for the greenway. The SVP incorporates the Ridge Road Recreational Park east of MD 355, which is currently under construction and will include recreational facilities such as an athletic field, playground, picnic area, basketball court and a trail. The portion of the North Germantown Greenway adjacent to I-270 is undeveloped for active recreation and is composed of mature forest.

f. Black Hill Regional Park

Black Hill Regional Park is located west of I-270 between Germantown and Clarksburg (see ***Figure II-4***). The park's 1,843 acres includes the 505-acre Little Seneca Lake. Black Hill Regional Park is under the jurisdiction of the M-NCPPC. The park was established with funds from Program Open Space, Montgomery County Capital Program and Montgomery County bonds. The park is bordered by West Old Baltimore Road to the north, Waters Landing to the southeast, I-270 to the northeast, and Clopper Road to the west. Park amenities include fishing, boating, hiking, picnicking, a visitor/nature center, equestrian trails, a fishing pier and a dock. No future plans for additional development of this park were identified. The portion of the park adjacent to I-270 is mature forest.

g. Little Bennett Regional Park

Little Bennett Regional Park is located to the east of I-270 in northern Montgomery County, just south of the Frederick County line (see ***Figure II-5***), and is under the jurisdiction of the

M-NCPPC. This park was established with funds from Program Open Space and the Montgomery County Capital Program. The 3,648-acre park is bordered by Lewisdale Road on the north, by open space to the south, by Burnt Hill Road to the east, and by Frederick Road to the west. Little Bennett Regional Park amenities include a golf course, camping and picnic areas, hiking and equestrian trails. A concept plan includes more extensive camping areas, trails, and passive recreation facilities. The portion of the park adjacent to I-270 is undeveloped with no future plans. On January 30, 2007 M-NCPPC acquired an additional 59 acres adjacent to the I-270 corridor to be added to the park. The final park boundary is yet to be established by M-NCPPC but they have indicated land adjacent to I-270 right-of-way will not be included in the park boundary. Coordination is ongoing with M-NCPPC to determine the park boundary.

h. Urbana Lake Fish Management Area

The Urbana Lake Fish Management Area is located west of I-270 between Urbana and Hyattstown (see ***Figure II-6***) and is under jurisdiction of MDNR. The 70-acre area is bordered on the north, south, and west by open space, and to the east by I-270. The area's sole amenity is the opportunity to fish. There is also a Maryland Public Television broadcast tower on the site. No future plans for additional development of this area were identified.

i. Urbana Elementary School Recreation Area

Urbana Elementary School is located on 21 acres in northwestern Urbana (see ***Figure II-7***) and is under the jurisdiction of the Frederick County Board of Education. Coordination with the school is ongoing. The intramural field is open to public use and contains a ball field, soccer field, tennis/basketball courts and a playground. The intramural field is located west of the school building and is bordered by I-270 at its western edge.

j. Urbana Community Park

Urbana Community Park is a 20-acre park located in northwestern Urbana (see ***Figure II-7***) and is under the jurisdiction of Frederick County. This park was established with funds from Program Open Space. The park is bordered by MD 355 on the east, on the west by I-270, on the south by Urbana, and on the north by open space. Park amenities include ball fields, grills, horseshoe pits, picnic shelters, play equipment, soccer fields, tennis courts, and volleyball courts. No future plans for additional development of this park were identified.

k. Monocacy National Battlefield Park

Monocacy National Battlefield is a National Historical Landmark (NHL) in Frederick County and is under the jurisdiction of the National Park Service (NPS). The park's 1,647 acres are bisected by I-270 (originally constructed in the 1950s as US 240), running from the northwest to the southeast (see ***Figure II-8***). The battlefield was the location of an important Civil War battle, the Battle of Monocacy, as judged by its consequences: Union forces conducted a strong defense that delayed the advance of Confederate forces under General Jubal Early on July 9, 1864, buying the time necessary for the Union army to successfully fortify Washington, DC against Confederate capture..

The battlefield was established in part by an Act of Congress in 1934 that created the Monocacy National Military Park. Meetings with the NPS began in 1971 due to increasing development and urbanization in the area and the need to preserve the battlefield. These meetings led to the designation as a National Historic Landmark in 1973 and its listing in the National Register in 1975. By the 1980s, the NPS began acquiring and protecting the national battlefield lands through fee simple purchases and scenic easements. Additional lands have been acquired through deed transfers between private owners, land trusts and NPS. The NPS now owns all six of the battlefield's major component properties.

Open space and the I-270 Technology Business Park are situated to the north, open space to the south and east, and Omega Center, McKinney Industrial Park, and Dudrow Business Park to the west.

The battlefield, which receives more than 18,000 visitors each year, is a historic landscape that encompasses land valued and utilized for farming and transportation, retaining many of the traditional landscape features, such as farm fields, roads, drives, lanes, fords, bridges and road traces. Historical use by the military for troop encampments and one camp established during the Civil War also figure in the significance of the landscape and existing structures. Examples of the structures that are key features relative to the Civil War battle are Hermitage (a.k.a. Best Farm), Araby Mill, Edgewood, Thomas Farm, Lewis Farm, Gambrill Farm, Worthington Farm and Baker Farm. The battlefield landscape remains largely unchanged from when the Confederate and Union troops fought aside from the presence of I-270. NPS is proceeding with development of a General Management Plan that will include interpretive plans. The new Visitor Center at Best Farm opened on June 27, 2007.

l. Baker Park

Baker Park is located in the City of Frederick on 53 acres of land (see ***Figure II-9***) and is under the jurisdiction of the City. The park was established by the City of Frederick. The park borders West 2nd St. to the north, Carroll Parkway to the south, North Bentz Road to the east, and US 15 to the west. Park amenities include a band shell, playgrounds, a swimming pool, softball and baseball fields, tennis courts, a covered bridge, a lighted ice-skating area, and a picnic area with 10 pavilions. Some of the park's notable features are its bell tower, a gazebo, a lake with a boathouse, and a 1913 armory which has since been converted to a recreation center. In addition to the park features, the historic Schifferstadt home is located within the Baker Park boundaries. No future plans for additional development of this park were identified.

m. Rose Hill Manor Historic Park

Rose Hill Manor Historic Park lies in northern Frederick City, just east of Fort Detrick (see ***Figure II-10***). This park was established with funds from Program Open Space and is owned by Frederick County. The park's 43 acres are bordered on the north by a Coca-Cola distributor, utility substation and access road, to the south by Governor Thomas Johnson High School, to the east by MD 355, and to the west by US 15. The park amenities include museum facilities, picnic facilities, and open space. The park features the Frederick County Museum, former Maryland Governor Thomas Johnson's retirement home (Rose Hill Manor), and other historic buildings. No future plans for additional development of this park were identified.

Table II-1. Parks and Recreational Areas Impacted by Alternatives 6A/B and 7A/B

Park Name **Park Owner**	**Size**	**Amenities**
Malcolm King Park City of Gaithersburg	72.9 acres	Basketball court, hiking trail, fitness trail, picnic tables, playgrounds, tennis courts, tot lots
Morris Park City of Gaithersburg	37.2 acres	Football/soccer field, basketball court, tennis courts, baseball fields, playground areas, picnic tables, grills
Seneca Creek State Park MDNR	6,290 acres	Biking trails, boat rental, cross-country skiing, campfire programs, fishing, flat water canoeing, hiking trails, hunting, playground, disk golf course, riding trails
Middlebrook Hill Neighborhood Conservation Area M-NCPPC	11.5 acres	Neighborhood conservation area; undeveloped
North Germantown Greenway M-NCPPC	300 acres	Athletic field, playground, picnic area, basketball court, trail (construction in progress)
Black Hill Regional Park M-NCPPC	1,843 acres	Fishing, boating, hiking, picnicking and nature center, mooring sites and equestrian trails
Little Bennett Regional Park M-NCPPC	3,648 acres	Golf, camping, picnicking, hiking
Urbana Lake Fish Management Area MDNR	70 acres	Recreational fishing area
Urbana Elementary School Frederick County	21 acres	Ball fields, soccer field, tennis/basketball courts, and playground
Urbana Community Park Frederick County	20 acres	Ball fields, grills, horseshoe pits, picnic shelters, play equipment, soccer fields, tennis courts, volleyball courts
Monocacy National Battlefield National Park Service	1,647 acres	Landscape of historic Civil War battlefield; historic structures throughout battlefield area; interpretive exhibits and visitor center.
Baker Park City of Frederick	53 acres	Band shell, playgrounds, swimming pool, softball fields, a little league field, tennis courts, a covered bridge, a lighted ice-skating area, picnic area with 10 pavilions
Rose Hill Manor Historic Park Frederick County	43 acres	Picnic facilities; carriage museum; antique farm museum

2. Historic Properties

The Maryland State Historic Preservation Officer (MD SHPO) has concurred that 10 historic properties are within the project's area of potential effects. Of these properties, the project would potentially use land from seven properties that are in or eligible for inclusion in the National Register of Historic Places (NRHP). The following is a brief description of each of these seven properties, with their Maryland Inventory of Historic Places (MIHP) numbers. A summary table (***Table II-2***) follows the descriptions, and the locations of these properties are shown in ***Figure II-1***. Historic properties can also be seen on the Plan Sheets in Appendix A of the AA/EA.

a. England/Crown Farm, M:20-17

The England/Crown Farm, located within the Gaithersburg City limits, is eligible for listing in the NRHP under Criterion A for its association with the agrarian history of Montgomery County (see ***Figure II-11***). The dwelling is part of a well-preserved early to mid-twentieth century farm complex totaling approximately 131 acres of which approximately 76 acres are included in the National Register-eligible site, originating with the England family in the late nineteenth century. In addition, it exhibits architectural significance because of its detailing, and the presence of a log dwelling, possibly originating as a tenant house during the ownership by the Hunter family predating the England family ownership. The property is in the early stages of subdivision. The England/Crown farm has been identified as a rare link to the agrarian past of the Gaithersburg area, which is increasingly overrun by subdivision construction. The MD SHPO concurs that the project will have an adverse effect on this resource (see **Appendix A**).

b. Belward Farm, M:20-21

The Belward Farm, located on the north side of MD 28 west of Key West Avenue in the vicinity of Gaithersburg, is eligible for the NRHP (see ***Figure II-12***). It is significant under Criterion A for its strong association with the agrarian history of Montgomery County. The 107-acre historic site is a remnant of a dairy farm, continuously operated by members of the same family who established it in the mid-nineteenth century. In addition, the farmhouse is an excellent example of an 1890s Victorian frame dwelling. Since early 1998, a portion of the historic site located east of the farmstead building cluster has undergone office park/research development near the Great Seneca Highway/Key West Avenue intersection. The MD SHPO concurs that the project will have an adverse effect on this resource (see **Appendix A**).

c. Atomic Energy Commission Building, M:19-41

The Atomic Energy Commission (AEC) Building (Department of Energy) site is located in Montgomery County, southwest of the I-270/MD 118 interchange (see ***Figure II-13***). Situated on 109.2 acres, the building served as AEC headquarters from 1957 to 1975. Between 1946 and 1975, the AEC, an independent federal commission overseeing nuclear sciences, conducted research and development programs or regulated the research of nuclear weapons, propulsion reactors, and technology for scientific, medical and industrial purposes. The building is eligible for the NRHP under Criterion A for its association with the development of new nuclear sciences and as the first post-World War II government agency to be located outside of Washington, DC. The building is also eligible under Criterion C for its design by prominent architects Vorhees, Walker, Smith & Smith. The building exemplifies the well-planned office and laboratory buildings for which the firm was known. The AEC Building also meets Criterion Consideration G, as a building of extraordinary significance for the activities that occurred there, such as oversight of the planning and construction of over one hundred nuclear power plants in the United States. The MD SHPO concurs that the project will have an adverse effect on this resource (see **Appendix A**).

d. Monocacy National Battlefield, F-3-42

Monocacy National Battlefield National Historical Landmark (NHL) is located south of the City of Frederick (see ***Figure II-8***). See also previous description in **Section A.2**. The monocacy battlefield historic property boundary encompasses 1,920 acres and retains much of the rural character of the mid-nineteenth century when it gained significance under Criterion A as the location of an important Civil War battle and as a rural historic landscape. Within the pastoral landscape of this portion of the Monocacy River valley roads, railroad and river come together. It was the site of a July 9, 1864 engagement of Union and Confederate forces that bought the time necessary for the Union army to successfully fortify Washington, DC against Confederate capture. The MD SHPO concurs that the project will have an adverse effect on this resource (see **Appendix A**).

The NRHP boundary includes 1,920 acres, while the present-day park boundary includes 1,647 acres. The historic surveyed boundary is not coincident with the park boundary, but in the area surrounding I-270 the differences are not great (see ***Figure II-8***). These slight differences in boundary determinations provide for the differences in impacts. Adjacent to I-270 southbound at the southern boundary, park acreage extends for approximately 1,100 feet southward beyond the NHL boundary. At the northern boundary adjacent to I-270, the park and the historic survey boundaries are identical up to the crossing of the CSX railroad right-of-way. On the northbound side, the historic boundary extends approximately 1,730 feet beyond the railroad, and the park boundary extends approximately 2,330 feet, an additional 600 feet. On the southbound side of I-270, the historic boundary extends approximately 1,700 feet north from the railroad, while the park boundary extends from 1,000 feet north of the CSX railroad for approximately 1,550 feet to the north.

e. Schifferstadt, F-3-47

Schifferstadt is located on a 1.5-acre parcel in Baker Park in the City of Frederick (see ***Figure II-9***) and is listed on the NRHP under Criterion C because it embodies the distinctive characteristics of German building traditions transported to Maryland in the eighteenth century. The MD SHPO holds an historic preservation easement on Schifferstadt. This large stone house is outstanding architecturally as an exceptionally well-preserved example of a vernacular building tradition, providing a palpable link to the traditions and patterns of early German settlement in this region. The grounds of Schifferstadt are well groomed, with mature trees adjacent to existing roadways. The MD SHPO concurs that the project will have an adverse effect on this resource (see **Appendix A**).

f. Rose Hill Manor, F-3-126

Rose Hill Manor, located in the City of Frederick, is listed in the NRHP (see ***Figure II-10***). This large, imposing, porticoed country mansion built near the turn of the nineteenth century is significant architecturally under Criterion C for its late Georgian-Greek Revival transitional style. It is also significant under Criterion B as the home of Maryland's first elected governor, Thomas Johnson. The historic boundary encompasses 30 acres that do not coincide with modern property boundaries. The MD SHPO concurs that the project will have an adverse effect on this resource (see **Appendix A**).

g. Birely-Roelkey Farmstead, F-3-134

Birely-Roelkey Farmstead, eligible for listing on the NRHP, is a 110.3-acre parcel located in the southeast corner of the US 15/Biggs Ford Road intersection (see ***Figure VII-14***). It was built about 1851 by John W. Birely, a prominent local businessman and cashier of the Farmers and Mechanics National Bank in the late nineteenth century. The property constitutes an important link to the agrarian tradition of Frederick County and is eligible under Criterion A for its association with the broad patterns of American agricultural history. Most of the contributing outbuildings date from the periods of the Birely and Roelkey ownerships. It is also significant under Criterion C for the buildings, for the architectural style of the main dwelling and an increasingly rare type of agricultural outbuilding, the blacksmith shop. The MD SHPO concurs that the project will have an adverse effect on this resource (see **Appendix A**).

Table II-2: Historic Properties Impacted by Alternatives 6A/B and 7A/B

Resource ID Resource Name	Size	NRHP Status	Eligibility Criteria	Comments
M:20-17 England/Crown Farm	76 acres	eligible	A	Balance of property (75 acres) is in subdivision.
M:20-21 Belward Farm	107 acres	eligible	A	Portion of site east of farmstead is developed as an office park.
M:19-41 Atomic Energy Commission Building	109.2 acres	eligible	A,C	NR boundary is limited to tax parcel area.
F-3-42 Monocacy National Battlefield (National Historical Landmark)	1,920 acres	listed	A	NRHP boundary is not coincident with the boundary of the Monocacy National Battlefield Park.
F-3-47 Schifferstadt	1.5 acres	listed	C	NR boundary is located within the boundary of Baker Park.
F-3-126 Rose Hill Manor	30 acres	listed	B, C	NR boundary established in April 1971 (date of NR listing) is not coincident with the boundary of Rose Hill Manor Historic Park and was established prior to US 15 roadway construction
F-3-134 Birely-Roelkey Farmstead	110.3 acres	eligible	A,C	No additional comments

B. USES OF SECTION 4(F) PROPERTY

The No-Build Alternative will not use any Section 4(f) properties.

Analysis of Alternatives 6A/B and 7A/B has identified potential uses to Section 4(f) properties in the project area. Impacts to Section 4(f) properties are the result of right-of-way acquisition and impacts to existing facilities from the construction of the highway and transit components of the alternatives. The impacts of Alternatives 6A/B and 7A/B are identical, as the alternatives are proposed on an identical physical footprint. The Section 4(f) properties impacted and the impacts to these properties are summarized in ***Table II-3***. Impacts shown are the result of using a 2:1 slope design, rather than the conventional 6:1 slope, for all highway improvements. Transit impacts have already been minimized by narrowing the transitway typical section for railroad

design criteria and track center offsets and through the use of retaining walls and steeper slopes where possible.

Table II-3: Section 4(f) Impacts

Resource	Resource Size	Alternative 6A/B (using 2:1 slopes)	Alternative 7A/B (using 2:1 slopes)
Parks and Recreation Areas			
Malcolm King Park	72.9 acres	0.75 acre	0.75 acre
Morris Park	37.2 acres	0.21 acre	0.21 acre
Seneca Creek State Park	6,290 acres	H- 6.93 acres T- 5.16 acres	H- 6.93 acres T- 5.16 acres
Middlebrook Hill Park	11.5 acres	2.13 acres	2.13 acres
North Germantown Greenway	300 acres	0.78 acre	0.78 acre
Black Hill Regional Park	1,843 acres	8.61 acres	8.61 acres
Little Bennett Regional Park	3,648 acres	0.29 acre	0.29 acre
Urbana Fish Lake Management Area	70 acres	1.23 acres	1.23 acres
Urbana Elementary School	21 acres	1.78 acres	1.78 acres
Urbana Community Park	20 acres	0.44 acre	0.44 acre
Monocacy National Battlefield	1,647 acres	14.50 acres	14.50 acres
Baker Park	53 acres	0.26 acre	0.26 acre
Rose Hill Manor Historical Park	43 acres	1.04 acres	1.04 acres
Historic Properties			
England/Crown Farm	76 acres	T -3.60 acres	T -3.60 acres
Belward Farm	107 acres	T -0.64 acres	T -0.64 acre
Atomic Energy Commission Building (Department of Energy)	109.2 acres	H-2.97 acres T-7.87 acres	H-2.97 acres T-7.87 acres
Monocacy National Battlefield NHL	1,920 acres	12.52 acres	12.52 acres
Schifferstadt	1.5 acres	0.09 acre	0.09 acre
Rose Hill Manor	30 acres	0.19 acre	0.19 acre
Birely-Roelkey Farmstead	110.3 acres	13.42 acres	13.42 acres

Impacts represent use of 2:1 slope design for roadway embankment; all transit impacts are minimized.
All impacts are the result of right-of-way needs for highway alignment unless indicated as (H) for highway and/or (T) for transitway.

FHWA regulations in 23 CFR 771.135(p)(2) state that a Section 4(f) constructive use can occur when a transportation project does not incorporate land from a Section 4(f) resource into the project, but the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only when the protected activities, features or attributes of the resource are substantially diminished. The *FHWA Section 4(f) Policy Paper* (March 1, 2005) also defines constructive use. In part, it states, "Constructive use is only possible in the absence of permanent incorporation or temporary occupancy of the type that constitutes a use of 4(f) land by a transportation project." Alternatives 6A/B and 7A/B will require permanent incorporation of land from all of the public parks and historic sites in the vicinity of the proposed project, and, therefore, constructive use does not apply to these resources.

Further, SHA and MTA intend to pursue *de minimis* impact findings for some park properties, including Malcolm King Park, Morris Park, Seneca Creek State Park, Middlebrook Hill Neighborhood Conservation Area, North Germantown Greenway, Black Hill Regional Park,

Little Bennett Regional Park, Urbana Lake Fish Management Area, and Urbana Community Park. Per 23 CFR 774.3(b), an analysis of feasible and prudent avoidance alternatives is not required for properties that would incur a *de minimis* impact, as a *de minimis* impact determination inherently includes the requirement for all possible planning to minimize harm (23 CFR 774.17). As noted previously, SHA has already incorporated several steps to minimize harm, such as the inclusion of 2:1 slopes rather than the conventional 6:1 slopes and the shifting of the roadway centerline to the west through the Monocacy National Battlefield to avoid impacts to important resources adjacent to the east side of the roadway. Transit impacts have already been minimized by narrowing the transitway typical section for railroad design criteria and track center offsets and through the use of retaining walls and steeper slopes where possible.

Additional minimizations have been identified that could be employed during further studies and during design. Minimization measures such as retaining walls are available for all resources. Additional design measures, such as reducing the typical section of the highway, will be considered as design advances. Potential avoidance options have been evaluated for Malcolm King Park (retaining wall), Morris Park (retaining wall), Little Bennett Regional Park (centerline shift), Urbana Lake Fish Management Area (centerline shift), Belward Farm (design modification), Schifferstadt (retaining wall), and Birely-Roelkey Farm (design modification).

Table II-4 at the end of this section summarizes the impacts of the current design, how the current design reduced impacts that would have occurred using conventional 6:1 slopes, avoidance measures (where available) and additional engineering measures to minimize harm that are available for each resource. ***Figures II-2 through II-14***, showing the potential impacts of Alternatives 6A/B and 7A/B, are provided in **Appendix B**.

1. Public Parks and Recreation Areas

a. Malcolm King Park

In order to implement Alternative 6A/B or 7A/B, I-270 southbound would be widened on the outside to provide for an ETL direct access ramp, an additional southbound lane and an auxiliary lane to extend the acceleration-deceleration lanes between I-370 and MD 117 as the highway passes Malcolm King Park. This outside widening would require the acquisition of 0.75 acre from the 72.9-acre park. The impact would occur over approximately 700 linear feet of roadway embankment (see ***Figure II-2***), approximately 80 feet wide on the north and decreasing towards the southern limit of the impact. The impacted parkland consists of grasses, wildflowers, and a few woody trees (all less than eight inches in diameter at breast height (DBH)). The proposed alignment will impact the edge of the forested area. The forest is a mixed-mesophytic forest composed primarily of Virginia pine, red maple, and sycamore. Although the widening will partially impact the forested buffer, the general use of the park and its amenities will not be impacted.

Avoidance Options

Shifting the proposed widening eastward away from Malcolm King Park to avoid the use of land from the park would not be prudent, as this shift would only cause additional impacts to Morris Park, which is immediately opposite Malcolm King Park and adjacent to the northbound lanes of

I-270. Such a shift would also require the complete reconfiguration of the I-270/I-370/Sam Eig Highway interchange and the mainline of I-270 for approximately one-half mile north and south of the interchange. Cost estimates, expected to be substantial, were not prepared for this avoidance alternative, as it would increase impacts to another Section 4(f) property.

The construction of a retaining wall in this location would eliminate the impacts to Malcolm King Park. The retaining wall would be approximately 700 feet long, average between nine and 27 feet high above ground and cost an estimated $1,035,000.

Measures to Minimize Harm

The construction of Alternatives 6A/B or 7A/B with steeper side slopes (2:1, as included in the original design) rather than with conventional 6:1 side slopes have reduced the projected impacts to Malcolm King Park from 1.28 acres to 0.75 acre using this technique.

Impact Summary for Malcolm King Park							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
72.9 acres	1.28 acres	0.75 acre	0.53 acre	0 acres	1.28 acres	0.75 acre	$1,035,000

b. Morris Park

In the vicinity of Morris Park, improvements to I-270 with Alternatives 6A/B or 7A/B would not require widening of the highway mainline on the northbound side (see ***Figure II-2***). However, the ramp from I-370 westbound to I-270 northbound will be realigned to access the reconfigured outermost northbound lane, requiring the acquisition of 0.21 acre from Morris Park. The additional right-of-way would be required along approximately 200 feet of the park adjacent to I-270. The impacted area is less than 60 feet wide at its widest, tapering to approximately 20 feet wide. In this area, a mature oak forest is approximately 100 feet from the existing roadway. The tree canopy is dominated by White Oaks in the 14 inches to 28 inches DBH range, with red maple, black cherry, black willow, and sassafras trees in the understory. Although the right-of-way acquisition will partially impact the forest edge, the general use of the park and its amenities will not be impacted.

Avoidance Options

Shifting the proposed right-of-way acquisition outside (westward) of Morris Park to avoid the use of land from the park would not be prudent, as this shift would require complete reconfiguration of the I-270/I-370/Sam Eig Highway interchange and the mainline of I-270 for approximately one-half mile north and south of the interchange. Such a reconfiguration may also cause additional impacts to Malcolm King Park, located in the northwest quadrant of the interchange. Cost estimates were not prepared for such an undertaking as this avoidance alternative was determined not to be prudent or feasible.

The construction of a retaining wall in this location would eliminate the impacts to Morris Park. The retaining wall would be approximately 200 feet long and average 24 feet high. The estimated construction cost of the wall would be $405,000.

Measures to Minimize Harm

The construction of a standard 6:1 slope in this location would have required the acquisition of 0.23 acres of land from Morris Park. By incorporating a 2:1 slope in the design of the improvements, the projected impact is reduced to 0.21 acres. The design of Alternatives 6A/B or 7A/B with steeper 2:1 side slopes has reduced the projected impacts to Morris Park by 0.02 acre.

Impact Summary for Morris Park							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
37.2 acres	0.23 acre	0.21 acre	0.02 acre	0 acres	0.23 acre	0.21 acre	$405,000

c. Seneca Creek State Park

Existing I-270 bisects Seneca Creek State Park where the highway crosses Seneca Creek. Under the proposed Alternatives 6A/B and 7A/B, an additional lane will be added through outside widening in both the northbound and southbound directions between the proposed Watkins Mill Road and Middlebrook Road, thus providing two barrier-separated ETLs and three general-purpose lanes in each direction (refer to ***Figure II-3***). Auxiliary lanes will also be provided between Middlebrook Road and Watkins Mill Road in the northbound direction. In the northbound direction, outside widening will require 3.35 acres of land from Seneca Creek State Park's 6,290 acres as a result of incorporating steeper 2:1 slopes in the design. In the southbound direction, outside widening with 2:1 slopes will require the use of 3.58 acres. The total acreage required for the highway widening is 6.93 acres

The additional right-of-way from the park would occur over approximately 1,600 linear feet and is between 0 and 160 feet in width on the northbound side. On the southbound side, the impact would extend for approximately 2,000 linear feet and is approximately 60 feet in width. The proposed improvements will cause impacts to vegetation, including forested floodplains and upland forest. The highway improvements will impact a mixed-age oak forest and a floodplain forest. Dominant canopy trees include white oak, scarlet oak, and northern red oak. Understory and edge trees include red maple, Virginia pine, and black locust. The American sycamore dominates the forested floodplain adjacent to Seneca Creek. Additional forest exists on either side of I-270 as part of an extensive wooded stream valley beyond the impact area, so a portion of the aesthetic buffer between I-270 and Seneca Creek will remain.

The construction of the CCT would require an additional 5.16 acres from Seneca Creek State Park, as it traverses the park parallel to I-270 on the southbound side. The transitway would impact a linear strip of the park between 115 to 210 feet wide and approximately 2,025 feet long. The transitway alignment through the park includes a 1,000 linear foot bridge and a 1,225 linear foot retaining wall. The bridge spans over Seneca Creek and Game Preserve Road, and the retaining wall restrains the park slope from the proposed transitway alignment. The retaining wall would be a maximum height of 32 feet and would be visible from the transitway.

Avoidance Options

There are no prudent or feasible options to avoid impacts to Seneca Creek State Park, because I-270 bisects the park. A shift of the proposed highway widening to either east or west of the

existing alignment would continue to impact the park. A shift of the transit alignment to the east or west of the proposed master plan alignment would also continue to impact the park, as the master-planned alignment bisects the park as well.

Measures to Minimize Harm

Measures to minimize harm to Seneca Creek State Park include the use of steeper slopes and retaining walls along the highway alignment. On the northbound side, the use of a standard 6:1 slope would result in an impact of 7.41 acres, an additional 4.06 acres of impact over the 2:1 slope (impact of 3.35 acres) that is incorporated in the original design. The construction of a retaining wall along the northbound side of I-270 would decrease the impacts to 0.50 acre, a decrease of 6.91 acres from the standard 6:1 slope and a decrease of 2.85 acres over the use of the 2:1 slope technique. The retaining wall would be approximately 1,300 feet long and average 29 to 31 feet in height. The wall would be visible from the park and from I-270 and would have an estimated cost of $2,853,000.

On the southbound side, the use of a standard 6:1 slope would result in an impact of 6.86 acres, nearly twice (an additional 3.28 acres) the impact of the steeper 2:1 slope technique (3.58 acres) incorporated into the design. A retaining wall approximately 1,800 feet long in this location could reduce the impact from the highway improvements to 1.15 acres, representing a reduction of 5.71 acres from the standard 6:1 slope and a reduction of 2.43 acres from the steeper 2:1 slope technique. The retaining wall would be between 24 and 26 feet in height at the southern and northern ends, lowering to only six feet high near the northern boundary of the park. The estimated cost of the retaining wall would be $2,673,000.

Impact Summary for Seneca Creek State Park								
Area of Park	Impact Area	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
6,290 acres	Hwy SB	6.86 acres	3.58 acres	3.28 acres	1.15 acres	5.71 acres	2.43 acres	$2,673,000
	Hwy NB	7.41 acres	3.35 acres	4.06 acres	0.50 acre	6.91 acres	2.85 acres	$2,853,000
	Total Hwy	14.27 acres	6.93 acres	7.34 acres	1.65 acres	12.62 acres	5.28 acres	$5,526,000
	CCT SB	--	--	--	5.16 acres	--	--	--

The transitway alignment design already incorporates the least intrusive measures to limit impacts to the park, i.e. retaining wall and a bridge. Therefore, no additional measures to minimize harm are identified for the transitway alignment.

d. Middlebrook Hill Neighborhood Conservation Area

Middlebrook Hill Neighborhood Conservation Area (NCA) is adjacent to the northbound side of I-270, where outside widening in the northbound direction for Alternatives 6A/B and 7A/B will provide for three general-purpose lanes and two ETLs (shown on ***Figure II-3***). The proposed widening would require the use of 2.13 acres of land from the 11.5-acre park over a length of approximately 1,000 feet and varying in width between approximately 60 feet and 120 feet. The right-of-way needed includes open field and forest land cover. Impacts in this area are not anticipated to affect fully developed trees. A mixed-age hardwood forest stand begins approximately 150 feet outside of the existing alignment.

Avoidance Option

There are no prudent or feasible options to avoid impacts to Middlebrook Hill NCA. Because of the park's proximity to Seneca Creek State Park, a shift of the roadway alignment to the west away from Middlebrook Hill NCA would also result in a shift of the CCT alignment further to the west, and would cause increased impacts to Seneca Creek State Park on the west side of I-270. The costs for this shift, and the increased west side impacts of this shift, have not been calculated, as the shift would not eliminate impacts to all Section 4(f) resources.

Measures to Minimize Harm

Measures to minimize harm to Middlebrook Hill NCA include the use of steeper slopes and retaining walls along the northbound highway alignment. The use of a standard 6:1 slope would result in an impact of 2.86 acres, an additional 0.73 acre of impact over the 2:1 slope that is incorporated in the original design.

The construction of a retaining wall along the northbound side of I-270 would decrease the impacts to 0.21 acre, a decrease of 2.44 acres from the standard 6:1 slope and a decrease of 1.92 acres over the use of the 2:1 slope technique. The retaining wall would be approximately 1,000 feet long and between 33 and 34 feet in height at the southern and northern ends, lowering to approximately seven feet high near the mid-northern end of the park. The estimated cost of the retaining wall would be $2,280,000.

Impact Summary for Middlebrook Hill Neighborhood Conservation Area							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
11.5 acres	2.86 acres	2.13 acres	0.73 acre	0.21 acre	2.44 acres	1.92 acres	$2,280,000

e. North Germantown Greenway

The construction of proposed Alternatives 6A/B and 7A/B will include roadway widening to the outside in both the southbound and the northbound directions to accommodate the construction of barrier-separated ETLs between Father Hurley Boulevard and MD 121, as shown on ***Figure II-4***. This widening will require 0.78 acre of right-of-way from the 381-acre North Germantown Greenway SVP, and occur over approximately 400 feet in length by approximately 100 feet wide along the westernmost edge of the Greenway property. Land cover in the area of impact is hardwood forest. Dominant canopy trees include white oak, northern red oak, scarlet oak, black cherry, and tulip-poplar. Red maple, white ash, and black gum are also present. The forest extends beyond its border with I-270 for at least 100 feet into the greenway. The Greenway is undeveloped for active recreation in this area, and no facilities are planned in the area adjacent to I-270.

The transitway component of Alternatives 6A/B and 7A/B includes the implementation of a new alignment transit corridor within the median of proposed Observation Drive Extended between Dorsey Hall Road and West Old Baltimore Road east of I-270. Implementation of the transitway does not impact the boundaries of the North Germantown Greenway and acquires no property from the resource as a result of the reservation of the Observation Drive Extended right-of-way, including width for the transitway, through the Greenway.

Avoidance Alternative

There are no prudent or feasible options to avoid impacts to the North Germantown Greenway. Because I-270 is bounded on the west by Black Hill Regional Park and on the east by North Germantown Greenway, an alignment shift of the roadway away from the Greenway on the northbound side of I-270 would increase impacts to Black Hill Regional Park on the southbound side. The amount of impact to either park resulting from this shift has not been calculated, as it would not eliminate all impacts to Section 4(f) properties.

Measures to Minimize Harm

Two measures to minimize park impacts have been considered: using a steeper slope and construction of a retaining wall. The original highway design uses 2:1 slopes as a minimization measure; the use of 6:1 slopes would have resulted in 1.40 acres of impact. The use of the 2:1 slopes has reduced the impact to 0.78 acre. By incorporating a retaining wall, park impacts could be reduced from 0.78 acre to 0.28 acre. The retaining wall would have an average above ground height of 23 feet, total 400 feet long, and visible from the park. The estimated construction cost for the wall is $780,000.

Impact Summary for North Germantown Greenway Stream Valley Park							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
300 acres	1.40 acres	0.78 acre	0.62 acre	0.28 acre	1.12 acres	0.20 acre	$780,000

f. Black Hill Regional Park

The construction of proposed Alternatives 6A/B and 7 A/B will include roadway widening to the outside in both the southbound and the northbound directions to accommodate the construction of barrier-separated ETLs between Father Hurley Boulevard and MD 121 (see ***Figure II-4***). This widening will require the acquisition of right-of-way from Black Hill Regional Park. Improvements will also include the construction of a partial cloverleaf interchange for the proposed Newcut Road and I-270 at the northern end of the park. The southbound element of the partial cloverleaf interchange will be located in the southwest quadrant, south of the proposed Newcut Road and west of I-270, as a result of agency coordination, and will require additional right-of-way from Black Hill Regional Park.

The widening (northbound and southbound) and interchange ramps (southbound) require the acquisition of 8.61 acres (using the 2:1 slope technique) from the 1,843-acre park. This impact occurs over a length of approximately 700 linear feet on the northbound side and 3,800 linear feet on the southbound side. The linear strip of land required is an average of approximately 60 feet wide. Improvements to southbound I-270 in this area will impact a mature oak-poplar forest. Dominant canopy trees include white oak, northern red oak, scarlet oak, black cherry, and tulip-poplar. Red maple, white ash, and black gum are also present. The proposed roadway expansion on the northbound side of I-270 will impact the wooded area adjacent to I-270 and a wetland (W-49W). The forest extends for at least 100 feet into the park. The portion of the park that will be impacted is not improved for recreation and does not include any amenities.

Avoidance Option

There are no prudent or feasible options to avoid impacts to Black Hill Regional Park. Because I-270 is bounded on the west by Black Hill Regional Park and on the east by North Germantown Greenway and a portion of Black Hill Regional Park, an alignment shift of the roadway away from Black Hill Regional Park on the southbound side would increase impacts to Black Hill Park and North Germantown Greenway on the northbound side. Costs for this option were not calculated, as the option would not completely avoid parkland impacts.

Measures to Minimize Harm

Two design measures to minimize park impacts have been considered: constructing steeper slopes and installing retaining walls. On the northbound side of I-270, use of 6:1 slopes would have resulted in an impact of 4.24 acres, an additional 2.50 acres of impact; however, the use of 2:1 slopes reduces the impact to 1.74 acres. By incorporating a retaining wall, northbound park impacts could be reduced to 0.73 acre. The retaining wall would be 700 feet long and extend an average of 31 feet above ground for the first 600 feet and average 21 feet above ground for the northernmost 100 feet. The wall would be visible from both the park and the highway. The estimated total construction cost for the wall is $1,710,000.

In order to minimize impacts to Black Hill Regional Park on the southbound side of I-270, the use of steeper slopes and construction of a retaining wall have been considered. The use of 6:1 slopes would result in impacts of 15.26 acres, an increase of 8.39 acres of impact; using the 2:1 slope design has reduced the impacts to 6.87 acres. Slope reduction techniques are used in both the roadway widening and ramp configurations. By incorporating a retaining wall, the amount of park impacts on the southbound side could be reduced to 3.36 acres. The retaining wall would be 3,100 feet long and constructed in two segments. The northernmost segment would average 17 feet above ground for the first 700 feet, average three feet in height for the next 400 feet and average 22 feet high for the last 2,000 feet. The second segment would begin 300 feet south of the first and stand an average of 16 feet high on the north end and an average of 10 feet high on the southern end. The retaining wall segments would be visible from both the road and the park. The estimated construction cost for wall is $5,220,000.

Another minimization measure would involve further coordination with the US Army Corps of Engineers (USACE) and MDNR to relocate the southbound interchange ramps back to the northwest quadrant. This would eliminate approximately 0.70 acre of impacts related to the interchange ramps but would increase impacts to the wetlands north of the proposed Newcut Road. The southbound ramp configuration was moved to the southwest quadrant, following publication of the DEIS, at the request of USACE and MDNR.

Impact Summary for Black Hill Regional Park								
Area of Park	Impact Area	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
1,843 acres	Hwy SB	15.26 acres	6.87 acres	8.39 acres	3.36 acres	11.90 acres	3.51 acres	$5,220,000
	Hwy NB	4.24 acres	1.74 acres	2.50 acres	0.73 acre	3.51 acres	1.01 acres	$1,710,000

g. Little Bennett Regional Park

Existing I-270 passes the westernmost edge of Little Bennett Regional Park near the MD 109 interchange and Bennett Creek (see ***Figure II-5***). Proposed Alternatives 6A/B and 7A/B would be adding one or two ETLs, respectively, in each direction, through inside widening. The general purpose lanes would be reconstructed to the outside to accommodate the barrier-separated ETLs. Little Bennett Regional Park is a 3,648-acre park that features a golf course, camping and picnic areas. Highway widening for the addition of ETLs would require the acquisition of 0.29 acre of right-of-way from the park. The portion of the park nearest to I-270 is dominated by the Bennett Creek floodplain, forest and pasture, and does not have any existing or planned recreational facilities. The park would be impacted in two locations. The northernmost impact would occur over a length of approximately 500 linear feet and is less than 40 feet wide overall, and the southernmost impact would be a small, triangular-shaped piece of land approximately 250 linear feet on its longest edge and 50 feet at its widest point.

Avoidance Option

An avoidance option could be developed that would move the centerline of existing I-270 in two locations adjacent to Little Bennett Regional Park approximately 30 feet to the west. At the southern boundary of the park, a westward shift would eliminate the small impact area located there. The approximately 500-foot long impacted area at the northern park boundary could also be eliminated by shifting the centerline to the west. This shift, however, would require reconfiguration of the MD 109 southbound ramps and possibly the overpass bridge. The centerline shifts would increase impacts to the area west of I-270, impacting approximately 0.5 acre of forested land in this area and possibly requiring relocation of Peachtree Road on the southbound side of I-270. Costs to adjust the centerline are anticipated to be substantial and have not been estimated.

Measures to Minimize Harm

The original highway design in the vicinity of Little Bennett Regional Park incorporates a 2:1 slope design that limits park impacts to 0.29 acre. Use of a 6:1 slope design would increase park impacts to 1.13 acres. Two impact areas would occur over a length of approximately 700 linear feet. Alternatively, retaining walls could be considered in these two areas of impact. These walls would be approximately 600 and 200 feet long, respectively, and have an average height of five feet above ground. The retaining walls would reduce the impact from 0.29 acre to 0.05 acre and would be visible from the park. The estimated construction cost for the retaining wall is $480,000.

Impact Summary for Little Bennett Regional Park							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
3,648 acres	1.13 acres	0.29 acre	0.84 acre	0.05 acre	1.08 acres	0.24 acre	$480,000

h. Urbana Lake Fish Management Area

Urbana Fish Lake Management Area is adjacent to I-270 southbound, north of the proposed MD 75 interchange. In this segment of I-270, proposed Alternatives 6A/B and 7A/B would add

ETLs to the inside through inside widening, and the outside general-purpose lanes would be reconstructed to the outside to accommodate the ETL and barrier separation (see ***Figure II-6***). The improvements would require acquisition of 1.23 acres of land from the park using a 2:1 slope design. Impacts to the 70-acre park will occur over a length of approximately 1,000 linear feet. The impacted area consists of hardwood forest and wetlands. Dominant canopy trees include tree-of-heaven, tulip-poplar, and black locust (all species eight inches to 12 inches DBH). Understory trees include American elm and box elder. This forest area extends for at least 100 feet away from the existing right-of-way, and is part of an extensive forest area surrounding the Urbana Lake.

Avoidance Option

An avoidance measure would shift the I-270 alignment east by approximately 15 feet at its furthest point of shift. The total length of I-270 that would be affected is approximately 2,200 feet. The additional cost of shifting the highway, not including maintenance of traffic, right-of-way acquisition or wetland mitigation, is minimal since the proposed southbound roadway widening would be completed in the existing grass median and the proposed northbound roadway widening would be completed on the outside of existing roadway. The length of new pavement would remain approximately equal to the existing roadway. The shift would increase the impact to lands currently used for farming and would potentially impact approximately 0.3 acre of wetland W-173E.

Measures to Minimize Harm

To minimize impacts to the park, two measures have been considered: steeper slopes and a retaining wall. Use of a 6:1 slope would result in 2.42 acres of park impact; however, use of a 2:1 slope in the current design has reduced park impact to 1.23 acres. A retaining wall along the southbound side of I-270 would further minimize parkland impact. The retaining wall would reduce the impact to 0.41 acre. The retaining wall would be an average height above ground of four to six feet, 1,100 feet long, and would be visible from both the park and the highway. The estimated construction cost is approximately $697,500.

In addition to the retaining wall, reducing the inside shoulder width would reduce the parkland impact from 0.41 acre to less than 0.01 acre.

Impact Summary for Urbana Lake Fish Management Area							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall*	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
70 acres	2.42 acres	1.23 acres	1.19 acres	0.41 acre	2.01 acres	0.82 acre	$697,500

* Constructing a retaining wall and reducing inside shoulder widths could reduce the impact to less than 0.1 acre.

i. Urbana Elementary School Recreation Area

Urbana Elementary School is just to the north of the I-270/MD 80 interchange on the northbound side of I-270. In the area adjacent to the school property, the MD 80 ramp to I-270 northbound joins the mainline general-purpose lane. The proposed ramp improvements are shown on ***Figure II-7***. To construct Alternatives 6A/B or 7A/B, the general-purpose lanes would be reconstructed to the outside to accommodate construction of the ETL and barrier adjacent to the median. The

extension of the acceleration ramp from MD 80 to I-270 northbound will require 1.78 acres from the school property (using a 2:1 slope), consisting of a strip of land approximately 700 feet long, narrowing from the southern property boundary to the northern property boundary. This acquisition would impact public recreational activities that take place on the softball and soccer fields close to I-270. The school's staff has indicated that it would be important not to impact public recreational uses of school property, *e.g.*, the activities that take place on the field adjacent to I-270.

Avoidance Alternative

There are no prudent or feasible options to avoid impacts to Urbana Elementary School, due to the location of the recreation area just to the north of the I-270/MD 80 interchange. Shifting I-270 to the west and away from Urbana Elementary School would require some reconstruction of the MD 80 interchange and would further impact the twelve residential properties on Fingerboard Road.

Measures to Minimize Harm

Minimization in the form of a steeper 2:1 slope has already been included in the design of the interchange and ramp, incurring 1.78 acres of impact. Were a standard 6:1 standard slope to be used, the impacts would increase to 1.98 acres and would extend farther south and east, further impacting the westernmost softball field area of the school. By incorporating a 2:1 slope as a standard design feature for the improvements, the impact is reduced by 0.20 acre. However, the 2:1 slope design would still impact activities on the westernmost softball field. By incorporating a retaining wall and reducing the outside shoulder to 10 feet, the impact is reduced to 0.42 acre. The retaining wall would be approximately 700 feet long and 15 feet high above ground and cost approximately $945,000. Construction of the retaining wall, with reduced outside shoulders, would eliminate interference with activities on the westernmost softball field in the recreation area.

Impact Summary for Urbana Elementary School Recreation Area							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall*	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
21 acres	1.98 acres	1.78 acres	0.20 acre	0.42 acre	1.56 acres	1.36 acres	$945,000

* Impacts are calculated using a reduced outside shoulder width of 10 feet.

j. Urbana Community Park

On I-270 in the vicinity of Urbana Community Park, outside widening will continue north towards MD 85. As the roadway approaches the park, the acceleration ramp from the MD 80 entrance ramp ends and merges with the outside general purpose lane (see ***Figure II-7***). Construction of either Alternative 6A/B or 7A/B would require acquisition of 0.44 acres from the 20-acre park to widen the northbound roadway using a 2:1 slope technique included in the current design. The park impact is along the right-of-way with I-270 and is approximately 500 feet long and between 50 and 35 feet wide. The impacted area is grassland with minor shrub vegetation adjacent to the roadway. No recreational facilities are located in this area.

Avoidance Alternative

There are no prudent or feasible options to avoid impacts to Urbana Community Park, due to the location of the park just to the north of the I-270/MD 80 interchange. Shifting I-270 to the west and away from Urbana Community Park would require some reconstruction of the MD 80 interchange and would further impact the twelve residential properties on Fingerboard Road.

Measures to Minimize Harm

Using a reduced slope (2:1) in the current design has reduced the potential impacts to Urbana Community Park from the 0.55-acre impact that would occur if a 6:1 slope were used. Further reductions in impacts could be attained using a retaining wall in place of the 2:1 slope. The retaining wall would be approximately 500 feet in length and average 11 feet above ground. The retaining wall would reduce impacts to 0.01 acre, would cost an estimated $525,000, and would be visible from the road.

Impact Summary for Urbana Community Park							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
20 acres	0.55 acres	0.44 acre	0.11 acre	0.01 acre	0.54 acres	0.43 acre	$525,000

k. Monocacy National Battlefield

The existing I-270 roadway bisects the Monocacy National Battlefield, a 1,647-acre park that includes the Monocacy National Battlefield NHL (the boundary of the park and the historical boundary are not coincident). The proposed roadway improvements under Alternatives 6A/B and 7A/B would terminate the ETLs south of the battlefield. Alternatives 6A/B and 7A/B will add one or two additional general-purpose lanes in each direction between the ETL terminus and MD 85. The additional lane(s) would be constructed through inside widening on the northbound side and outside widening on the southbound side (see ***Figure II-8***). The roadway alternatives would share the identical impact footprint in this area. Following preliminary consultation with the NPS, the proposed roadway widening was shifted entirely to the west (southbound) side of I-270, with no right-of-way needs (pending further coordination and completion of a MOA for mitigation) on the east (northbound) side of the highway (see coordination and consultation in **Appendix A**). This westward shift in widening would reduce the overall right-of-way take within the battlefield and preserve cultural resources in the park on the eastern (northbound) side of the highway. Alternatives 6A/B and 7A/B improvements are designed using steeper 2:1 slopes on the southbound side of the roadway to reduce right-of-way acquisition. The improvements will result in the acquisition of 14.50 acres from the park. The impact will occur over a length of 12,200 feet and would vary in width between approximately 20 and 140 feet.

The impacted area of the battlefield contains hardwood forest, hedgerows, and farm fields and pasture land that are much the way the landscape appeared at the time of the Civil War battle fought here. Several layers of vegetation exist, with the canopy mainly comprised of silver maple, black locust, box elder, sassafras, and smooth sumac trees. The proposed improvements would require the taking of some vegetation. The hedgerow serves as a moderate-quality buffer between I-270 and the park, and will be completely removed in some southbound locations, based on the proposed design features. The existing Worthington Trail is in close proximity to

the southbound I-270 roadway north of Baker Valley Road. The proposed right-of-way may impact the Worthington Trail, requiring its relocation slightly to the west. There are no other impacts to existing or planned amenities.

Avoidance Option

There are no prudent or feasible options to avoid impacts to Monocacy National Battlefield, because existing I-270 bisects the park. The westbound shift, recommended by the NPS and considered in the above discussion, avoids impacts to important cultural resources located on the east side of the existing highway. Any shift of the proposed widening back to the east would have greater impacts to the park.

Measures to Minimize Harm

Several measures have been considered to minimize harm to the National Historical Landmark, and two have been implemented in the preliminary design of Alternatives 6A/B and 7A/B. The first minimization measure, as suggested during NPS/SHA consultation, is to shift the roadway centerline west thus requiring new right-of-way only west of existing I-270 and preserving more sensitive resources located east of the existing highway right-of-way. The second minimization measure is to employ 2:1 slopes along the southbound section of I-270, thereby minimizing the impacts that would occur with the use of a more standard 6:1 slope configuration (23.63 acres, or an additional 9.13 acres). The westward centerline shift and 2:1 slope combined design results in 14.50 acres of park impact.

After consulting with the NPS, a third measure to minimize harm may be considered that incorporates underground stormwater management for highway runoff occurring through the Monocacy National Battlefield boundaries. Stormwater management facilities are not included in this preliminary design.

Retaining walls were also evaluated as a minimization measure. The use of retaining walls on the southbound side would provide an additional reduction in impacts, from 14.50 acres with 2:1 slopes to 3.71 acres with retaining walls. Retaining walls on the southbound side of the highway would be constructed in four segments, with breaks at or near the southern boundary of the park, Baker Valley Road, the Monocacy River, and at the CSX Railroad right-of-way.

- The first segment would begin at the park boundary, south of the scenic overlook, and continue for approximately 500 linear feet, and be approximately four feet high above ground. The wall extends the next 800 feet at an average height of five feet above ground. North of the scenic overlook drive, the retaining wall would continue north for another 2,000 feet to Baker Valley Road. This portion of retaining wall would be between three feet and six feet high.
- North of Baker Valley Road, the retaining wall would extend another 4,300 linear feet north to the Monocacy River and be approximately four feet high near Baker Valley Road and extend to approximately seven feet high at the river.
- A 12-foot high wall would extend from the north bank of the Monocacy to the CSX Railroad right-of-way, a length of 1,300 linear feet.
- The final segment of retaining wall would extend from 1,000 feet north of the CSX Railroad right-of-way north to the park boundary just south of Shockley Drive. This

portion of the retaining wall would vary in height between nine feet and six feet, and extend for 1,600 linear feet.

The series of retaining walls would be visible from both the park and roadway and are estimated to cost $7,402,500. Through consultation with NPS, retaining walls are not desired due to the visual impacts these walls would introduce into the cultural landscape. However, further coordination on minimization design techniques is continuing between NPS and SHA and the use of retaining walls to reduce impacts at specific locations may be explored.

Impact Summary for Monocacy National Battlefield Park							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
1,647 acres	23.63 acres	14.50 acres	9.13 acres	3.71 acres	19.92 acres	10.79 acres	$7,402,500

l. Baker Park

Baker Park is located just south of the interchange of US 15 and Rosemont Avenue. The 53-acre park has an irregular border along US 15, due to an easement purchased by SHA from the City of Frederick. The construction of Alternatives 6A/B or 7A/B would require the widening of US 15 from two lanes in each direction to three lanes plus an auxiliary lane in each direction (see ***Figure II-9***). One of the two additional lanes would be added to the inside grass median of the roadway, and the other will be added on the outside. In order to widen the highway, 0.26 acre would need to be acquired from Baker Park. The design incorporates the use of 2:1 slopes that reduce impacts to the resource. The park impacts would occur at the southern (a small triangle of land) and northern (a strip taking measuring approximately 200 feet long and between 40 and 7 feet wide) edges adjacent to US 15, north and south of the SHA-owned easement parcel. The impacted land contains grassland and a hedgerow approximately 10 feet to 15 feet wide. The proposed impact area also includes the existing right-of-way and property within the Schifferstadt historic boundary. The hedgerow contains black locust, red maple, black walnut, and smooth sumac trees. A defined understory is vegetated with wineberry, box elder, and apple. This hedgerow serves as a low-quality wooded buffer between the homestead and US 15. US 15 is currently visible from most areas of the property. The majority of the proposed impact area is mowed and maintained as fescue, and sparse woody vegetation exists. One significant tree, which is situated in the proposed right-of-way, may be impacted. The tree is a mature weeping willow with poor form and structure, exhibiting a five-forked trunk. The largest trunk measures 27.9 inches in diameter at breast height (DBH).

The exclusion of the SHA parcel from the property of Baker Park would also affect the impact of DEIS Alternatives 3A/B, 4A/B and 5A/B/C. All of these alternatives would have the same footprint as they pass Baker Park.

Avoidance Option

There are no prudent or feasible options to avoid impacts to Baker Park, due to the location of Baker Park adjacent to the US 15/Rosemount Avenue interchange. Shifting US 15 west and away from Baker Park would require the interchange to be completely reconstructed. The reconstructed interchange would impact the surrounding residences and may potentially impact

another Section 4(f) resource, Waterford Park, located opposite Baker Park along southbound US 15.

Measures to Minimize Harm

Two measures have been considered to minimize impacts to Baker Park: steeper slopes and a retaining wall. Use of a 6:1 slope would have resulted in 1.08 acres of impact to Baker Park; however, the use of a 2:1 slope (as in the current design) has reduced park impacts to 0.26 acres (a difference of 0.82 acre). By incorporating a retaining wall for northbound US 15, impacts to the park would be reduced to 0.02 acre. The retaining wall would be an average height above ground of seven feet and 700 feet long. The wall would extend across the park boundary, the SHA easement, and through the Schifferstadt drainage easement and would be visible from the park and the historic Schifferstadt dwelling (approximately 200 feet of the wall would be located within the drainage and sewer easement on the Schifferstadt property (see **Section II.B.3 b.** following). The existing hedgerow would be impacted due to retaining wall construction. The estimated construction cost is approximately $525,000.

Impact Summary for Baker Park							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
53 acres	1.08 acres	0.26 acre	0.82 acre	0.02 acre	1.06 acres	0.24 acre	$525,000

m. Rose Hill Manor Historic Park

Construction of Alternatives 6A/B or 7A/B in the vicinity of Rose Hill Manor Historic Park would include widening US 15 from two lanes to three lanes plus an auxiliary lane in each direction (see ***Figure II-10***). One of the two additional lanes would be added to the inside grass median of the roadway, and the other will be added on the outside. In order to widen the highway, 1.04 acres would need to be acquired from the 43-acre park. The impact would occur along 1,850 feet long adjacent to US 50 and be approximately 50 feet wide at its widest point. The distance between the highway and the historic Rose Hill Manor mansion (see Section b. following) would remain over 500 feet. The length of parkland impacted from widening the northbound US 15 roadway would be between 1,200 linear feet and 1,600 linear feet along the park's western boundary. The proposed project will impact grasslands and a hedgerow that is approximately 10 feet to 30 feet wide. This grassed area is mowed regularly. The hedgerow currently exists within the existing highway right-of-way and clear zone and is dominated by early successional species, including red mulberry, tree-of-heaven, white pine, and smooth sumac. Larger white oaks (four inches to 12 inches DBH), scarlet oaks (eight inches to 12 inches DBH), and black walnuts (two inches to 14 inches DBH) exist in the hedgerow. The hedgerow serves as a low-quality wooded buffer between Rose Hill Manor Historic Park and US 15. This hedgerow buffer area will be almost completely removed by the proposed design.

Avoidance Option

There are no prudent or feasible options to avoid impacts to Rose Hill Manor Historical Park, due to its location immediately northeast of the US 15/Motter Avenue/Opossumtown Pike interchange. Shifting US 15 west and away from Rose Hill Manor would require reconstruction of the interchange. This reconstruction would potentially impact the Thomas Johnson High

School recreation area (another Section 4(f) resource), the Frederick Research Park and a nearby apartment complex.

Measures to Minimize Harm

Two measures have been considered to minimize park impacts: steeper slopes and a retaining wall. Use of a 6:1 slope would have resulted in 2.60 acres of impact to Rose Hill Manor Historical Park, an additional 1.56 acres compared to the 1.04-acre impact from using the 2:1 slope technique presented in the current design. A retaining wall would reduce park impacts to 0.16 acre. The retaining wall would be an average height of five to seven feet above ground, 1,800 feet long, and would be visible from both the park and the highway. The estimated construction cost is approximately $1,110,000.

Impact Summary for Rose Hill Manor Historic Park							
Area of Park	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
43 acres	2.60 acres	1.04 acres	1.56 acres	0.16 acre	2.44 acres	0.88 acre	$1,110,000

2. Historic Properties

Seven historic properties may be impacted by the construction of Alternatives 6A/B and 7A/B, as indicated in ***Table 4***. Details of each of these impacts are identified in the following text.

a. England/Crown Farm, M:20-17

Under Alternatives 6A/B and 7A/B, a transitway alignment would be constructed on a diagonal path through the England/Crown Farm (see ***Figure II-11***), based on the Montgomery County Master Plan CCT alignment. The transitway would accommodate the operation of either light rail or bus rapid transit vehicles in an exclusive right-of-way. The transitway alignment impacts approximately 3.60 acres of fallow farm field that is awaiting approval of development site plans. An approximately 7.98 acres of land would be separated from the remainder of the farm and the main farmhouse. The distance between the tracks at its nearest point and any historic structure is approximately 380 feet, and the distance between the tracks and the hiker/biker path is approximately 450 feet. The right-of-way required from the England/Crown Farm site is approximately 1,400 feet in length and approximately 120 feet wide. The January 10, 2008 Effects Determination letter from SHA to the MD SHPO (see **Appendix A**) determined that the Alternatives 6A/B and 7A/B would have an adverse effect on the England/Crown Farm.

Avoidance Option

There are no prudent or feasible options to avoid impacts to England/Crown Farm if Alternatives 6A/B or 7A/B are implemented as planned. The transitway is proposed to be located along the Montgomery County Master Plan alignment, and the alignment of the transitway is being incorporated into the development design for the Crown Farm property. An avoidance alignment was investigated that would begin after the CCT cleared the I-270/Shady Grove Road Interchange. The potential CCT avoidance alignment would follow the west side of Omega Drive to Key West Avenue (MD 28) then turn west and follow the north side of Key West Avenue to Diamondback Road where it would turn north until rejoining the CCT Master Plan

alignment at Decoverly Drive. This avoidance alignment to the south could avoid impacts to the England/Crown Farm, but would impact forested areas, a stream, traffic patterns on MD 28 and to several office building sites, and their associated parking areas, that were not planned for a transitway alignment and its right-of-way. In addition, the avoidance alignment would eliminate two proposed CCT transit stations that have been planned for adjacent land uses which would support transit oriented development. The potential impacts of this avoidance alignment have not been calculated.

Measures to Minimize Harm

The proposed transitway alignment located on the England/Crown Farm property is based on the Montgomery County Master Plan alignment reservation traversing the property in a generally east-west direction, and a new office building eliminates the possibility of a minor alignment shift away from the England/Crown Farm. The original design incorporates minimum railroad design criteria for typical section elements (*i.e.* side slopes, profile grades, level grade for station/platform areas and track center offsets). In addition, the alignment profile is roughly level with the surrounding topography (at-grade). An additional technique being considered, in consultation with the developer, would extend the CCT alignment more perpendicularly across the historic property (directionally southwest to northeast). The alignment would cross over I-270 and Shady Grove Road and extend along Fields Road approximately 2,500 feet before turning south to cross over the England/Crown Farm property for an estimated length of 1,600 feet and width of 50 feet and within the median of the proposed Decoverly Drive. This alignment would decrease the impacts from 3.60 acres to 2.10 acres. Consultation is ongoing to determine which alignment will be selected. Additional techniques to minimize harm to the historic resource may be considered as part of the on-going Section 106 consultation effort.

b. BelwardFarm, M:20-21

Under Alternatives 6A/B and 7A/B, the CCT alignment would traverse to the east of Belward Farm and not impact the resource. Impacts to Belward Farm would result from a proposed parking facility for the planned Decoverly Station and the hiker-biker trail that would be located on the west side of the transitway, impacting Belward Farm on its eastern boundary near Great Seneca Highway (see ***Figure II-12***) and the existing office complex located at Great Seneca Highway and Key West Avenue. The parking facility is initially proposed to accommodate approximately 250 vehicles. The station site, parking lot and hiker-biker trail would collectively impact 0.64 acre of the approximately 107-acre historic property on the edges adjacent to the cffice complex. The approximate distance between the historic structure and the transitway alignment at its nearest point is 2,170 feet, the parking lot is 1,730 feet away, and the hiker/biker path is 2,140 feet away. A large grove of trees in the intervening distance blocks the view from the historic farm house to the parking facility. The January 10, 2008 Effects Determination letter from SHA to the MD SHPO (see **Appendix A**) determined the proposed improvements would have an adverse effect on the Belward Farm as a result of the implementation of Alternatives 6A/B or 7A/B.

Avoidance Option

There are no options to avoid impacts to Belward Farm if Alternative 6A/B or 7A/B is implemented as proposed. This is due to the location of the Montgomery County Master Plan CCT alignment as well as the location of a proposed flyover ramp right-of-way associated with the Sam Eig Highway/Great Seneca Highway interchange. As noted in the minimization measures, narrowing the transitway typical section was incorporated into the original design for railroad design criteria and track center offsets. One potential avoidance option could involve the reconfiguration of the parking facility for the proposed Decoverly Station, and relocation of the hiker-biker trail as they become integrated into future land use in this area. Further study of parking requirements may indicate that a smaller parking facility could be sufficient in this location, thus allowing a smaller facility footprint that may avoid impacting the property.

Measures to Minimize Harm

The transitway improvements proposed to be located on the Belward Farm property are based on the Montgomery County Master Plan alignment for the CCT. Measures to minimize impacts would include reducing the parking facility footprint and/or reconfiguration of the station site to eliminate its property impact. The hiker-biker trail, the transitway alignment, and the proposed Decoverly Station are located outside of the historic property boundary. Due to alignment constraints from the proposed Sam Eig Highway/Great Seneca Highway flyover ramp right-of-way, the parking facility is located closest to the Belward Farm property and uses a portion of the property. To lessen the impacts, the transitway included a narrowed typical section in the original design and incorporated minimum railroad design criteria for typical section elements (i.e. slope grades) and track center offsets. Additional techniques to minimize harm to the historic resource may be considered as part of the on-going Section 106 consultation effort.

c. Atomic Energy Commission Building, M:19-41

With Alternatives 6A/B and 7A/B, project improvements for both transitway and highway alignments will impact the AEC (Department of Energy property; see ***Figure II-13***). Highway improvements in this area include outside widening, relocation of the ramp from MD 118 eastbound to I-270 southbound and adding ETL direct access ramps to the MD 118 overpass. The highway widening, ramp relocation and direct access ramps will require the acquisition of 2.97 acres along approximately 1,500 feet of the eastern site boundary adjacent to southbound I-270. The width of the right-of-way needed would vary and be approximately 100 feet at its widest.

The highway impact will not affect the current operations at the AEC building. The highway impact would require removal of the hedgerow from within the existing I-270 right-of-way. The highway impact would also require the removal of trees adjacent to I-270 from the large forest stand on the southeastern border of the property, but the removal of these trees would not be visible from the building.

The AEC site has been determined eligible for listing in the NRHP since the DEIS publication, and the impacts of Alternatives 3A/B, 4A/B and 5A/B/C were not determined at that time. Alternative 5C, described in the 2002 DEIS, would have approximately the same highway

impact (2.97 acres) as Alternatives 6A/B and 7A/B. The highway component of Alternatives 3A/B, 4A/B and 5A/B would have similar impacts to the AEC site, as the alternatives' alignments and typical sections are similar.

The proposed CCT will traverse along the western boundary of the AEC site from Middlebrook Road north to MD 118. After traversing the AEC property, the transitway would cross MD 118 to access the planned Germantown Transit Center station just north of MD 118. The transitway alignment is based on the Montgomery County Master Plan alignment. The transitway would impact the western edge of the AEC property, requiring the removal of a row of trees along the western edge of the property, and cross the Middlebrook Road entrance driveway (at the south end of the AEC site) via an at-grade crossing, affecting the rear parking area and secondary (non-public) site access to Middlebrook Road. The total impact of the transitway improvements is 7.87 acres of the AEC property, and extends for approximately 3,500 feet along the western edge of the property. The impact is between 110 feet and 200 feet wide.

The January 10, 2008 Effects Determination letter from SHA to the MD SHPO (see **Appendix A**) determined the proposed improvements would have an adverse effect on the AEC Building site as a result of Alternatives 6A/B or 7A/B.

Alternatives 3A/B, 4A/B and 5A/B are estimated to have the same transitway impact on the AEC site, 7.87 acres, as Alternatives 6A/B and 7A/B. Alternative 5C does not include the CCT alignment, and therefore would not impact the AEC site.

Avoidance Option

There are no prudent and feasible options to avoid impacts to the AEC site. Shifting the highway approximately 150 feet to the east would avoid impacts from the highway widening to the AEC site, but would impact approximately 16.60 acres to the east side of the highway (using a 2:1 slope). This represents an increase of approximately 13.63 acres of total impact and would require complete reconfiguration of the I-270/MD 118 interchange and reconfiguration of the I-270/Middlebrook Road exit loop ramp in the northeast quadrant. The additional impacted area to the east is forestland (approximately 3 acres). The centerline shift could cost an estimated $20 to $30 million.

Shifting the transitway slightly to the west, but still on the east side of Middlebrook Road, to avoid impacting the AEC site would impact an estimated 30 or more residences and possibly several businesses. Shifting the transitway to the west side of Middlebrook Road to avoid impacting the AEC property would also impact many (an estimated 60 or more) residential properties on both sides of Middlebrook Road. Both of these avoidance options would constitute an impact of extraordinary magnitude and thus may be considered not prudent. Shifting the transit BRT option onto Middlebrook Road could also avoid impacts of the transitway to the AEC site, but would impact the operating efficiency of the BRT due to mixing with local traffic, and is also considered not prudent.

Measures to Minimize Harm

Measures to minimize harm from the highway alignment include the use of steeper slopes and the construction of a retaining wall in this location. However, the use of 6:1 slopes would impact approximately 10.20 acres, 7.23 acres more than the use of 2:1 slopes. Construction of a retaining wall would further reduce the impact from 2.97 acres to 1.44 acres. The retaining wall would average 15 feet high above ground and extend approximately 2,000 feet along the AEC boundary. The estimated cost of the retaining wall would be $2,700,000. The retaining wall would be visible from the highway and would not obstruct the view of the highway from the building.

Highway Impact Summary for Atomic Energy Commission Site for Alternatives 6A/B and 7A/B							
Area of Resource	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
109.2 acres	10.20 acres	2.97 acres	7.23 acres	1.44 acres	8.77 acres	1.53 acres	$2,700,000

The transitway alignment, as shown in the original design, already includes minimization features such as narrowing the typical section by incorporating minimum railroad design criteria for typical section elements (*i.e.* slope grades and track center offsets). Shifting the alignment slightly to the west could lower impacts in the west side of the site, but such a shift would cause an estimated 30 or more residential impacts, as discussed in the avoidance section above. An additional minimization technique may include the incorporation of a retained cut typical section for the transitway at key impact areas to the property. The retained cut section may be employed using retaining walls outside the dynamic vehicle envelope as well as any needed width for drainage systems, emergency egress walkways, lighting (BRT), signal/communications and power (LRT) systems equipment. The retaining walls would not be visible from the historic office complex/buildings as most of the retaining wall length and height would be located along the east side of the CCT alignment with the tracks located below the existing ground. The resulting minimized impact to the historic property has not yet been calculated. Additional techniques to minimize harm to the historic resource may be considered as part of the on-going Section 106 consultation effort.

d. Monocacy National Battlefield, F-3-42

Alternatives 6A/B and 7A/B would widen I-270 in this area by the addition of one or two general purpose lanes in each direction. The additional lane(s) will be constructed through inside widening in the northbound direction and by outside widening in the southbound direction (see ***Figure II-8***), as noted earlier in **Section II.B.2.a**. Also note that the historic property boundary is not coincident with the park boundary. The highway improvement is designed using 2:1 slopes on only the southbound side of the roadway, as determined in consultation with the NPS (see coordination and consultation correspondence in **Appendix A**), and will require the acquisition of 12.52 acres from the Monocacy National Battlefield NHL on the southbound side. The impact will occur over a length of 12,200 linear feet, and varies in width up to approximately 140 feet. The January 10, 2008 Effects Determination letter from SHA to the MD SHPO (see **Appendix A**) determined the proposed improvements would have an adverse effect on the Monocacy National Battlefield as a result of Alternatives 6A/B or 7A/B.

Avoidance Option

There are no prudent or feasible options to avoid impacts to the Monocacy National Battlefield. Because I-270 bisects the park, the proposed shift of the highway to the west would continue to cause impacts in the western portion of the Battlefield.

Measures to Minimize Harm

Please refer the discussion in the parkland section (**II.B.2.a**) for more detail. The use of a 6:1 slope in this area would impact 20.01 acres, an increase of 7.49 acres over the 12.52 acres of impact that would occur with the 2:1 slope incorporated in the initial design. Installation of a retaining wall has been determined incompatible with the nature of the historic landscape of the resource; however, a retaining wall on the southbound side would provide an additional reduction in impacts, from 12.52 acres with 2:1 slopes to 3.50 acres with retaining walls. Review **Section II.B.3.a** for a description of the sections of the wall. Additional techniques to minimize harm to the historic resource may be considered as part of the on-going Section 106 consultation effort.

Impact Summary for Monocacy National Battlefield NHL							
Area of Resource	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
1,920 acres	20.01 acres	12.52 acres	9.02 acres	3.50 acres	17.51 acres	9.02 acres	$2,700,000

e. Schifferstadt, F-3-47

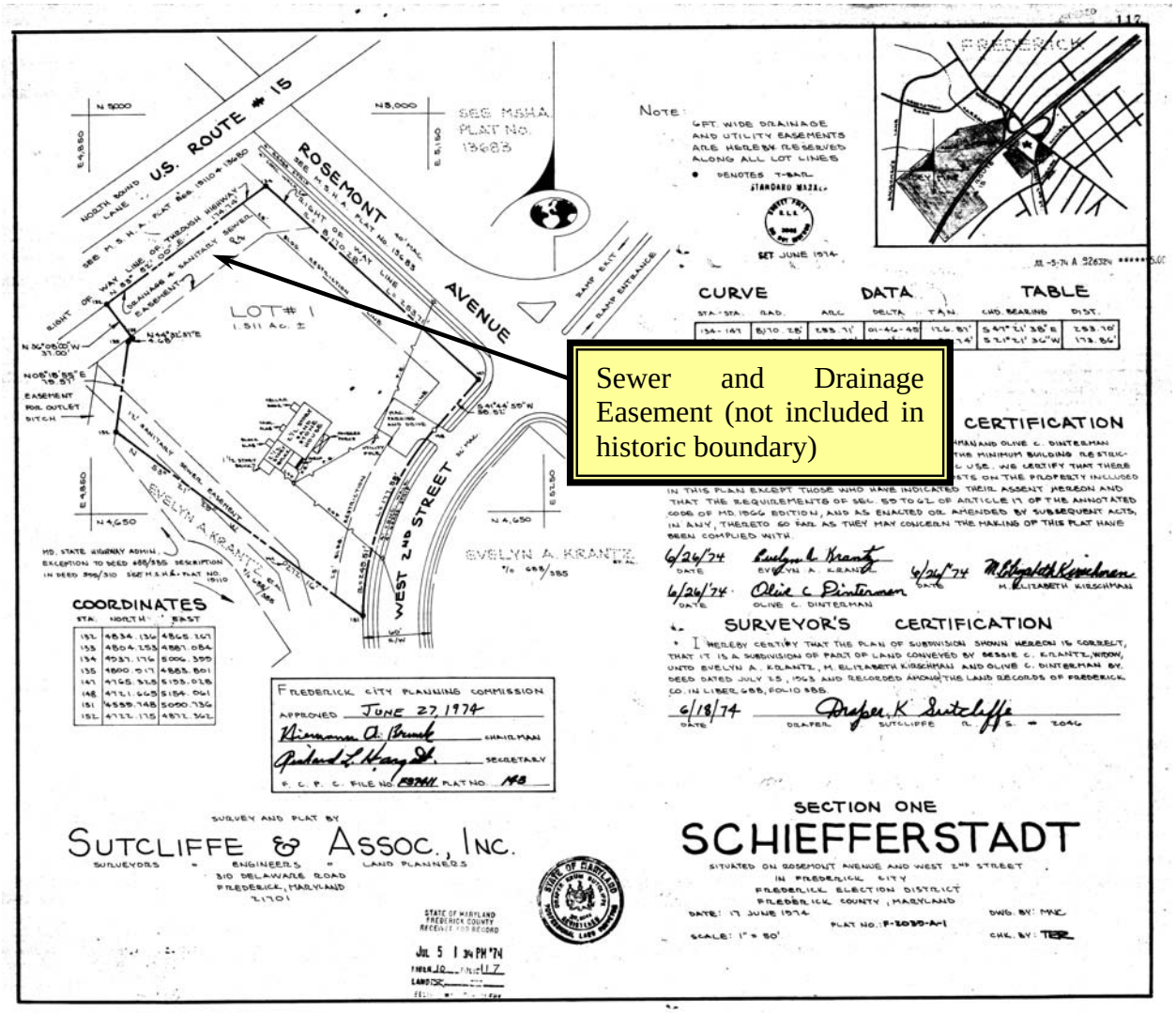
The construction of Alternatives 6A/B or 7A/B would require the widening of US 15 from two lanes in each direction to three lanes plus an auxiliary lane in each direction (see ***Figure II-9***). One of the two additional lanes would be added to the inside grass median of the roadway, and the other will be added on the outside. In order to widen the highway, 0.09 acre would need to be acquired from the Schifferstadt historical boundary. The design incorporates the use of 2:1 slopes to assist with resource impact minimization. The impact of the highway widening in this area will occur over approximately 200 linear feet along the resource's boundary with northbound US 15. The impacted land contains grassland and a hedgerow approximately 10 feet to 15 feet wide containing mature trees (see previous description of Baker Park). The January 10, 2008 Effects Determination letter from SHA to the MD SHPO (see **Appendix A**) determined the proposed improvements would have an adverse effect on Schifferstadt as a result of Alternates 6A/B or 7A/B.

Avoidance Option

Within the parcel boundary of the Schifferstadt property there is an approximately 37-foot wide drainage and sewer easement adjacent to US 15 that is excluded from the Schifferstadt historic boundary, as shown on ***Figure II-15***. By constructing a retaining wall within the bounds of the easement, impacts within the historic boundary could be avoided. However, the construction of a retaining wall may not be compatible with the nature of the historic landscape of the resource. Construction of the retaining wall would occur over approximately 200 feet and be approximately seven feet above ground. The estimated cost would be $150,000. The retaining wall would be contiguous with the retaining wall that would be constructed for Baker Park. An

alignment shift to the west would also eliminate impacts to Schifferstadt, but would require reconfiguration of the Rosemont Avenue interchange and could possibly impact Waterford Park on the west side of US 15 (see **Section II.B.2.a**, Baker Park).

Figure II-15: Schifferstadt



Measures to Minimize Harm

Two measures have been considered to minimize impacts to Schifferstadt, as described previously for Baker Park: steeper slopes and a retaining wall. Use of a 6:1 slope would have resulted in 0.67 acres of impact to the Schifferstadt property; however, the use of a 2:1 slope (as in the current design) has reduced impacts to 0.09 acre (a difference of 0.58 acres). By incorporating a retaining wall for northbound US 15 within the sewer and drainage easement, impacts to the historic resource would be eliminated (see avoidance discussion and **Section II.B.**).

Impact Summary for Schifferstadt							
Area of Resource	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
1.5 acres	0.67 acre	0.09 acre	0.58 acre	0.0 acres	0.67 acre	0.09 acre	$150,000

f. Rose Hill Manor, F-3-126

Construction of Alternatives 6A/B or 7A/B in the vicinity of Rose Hill Manor would include widening US 15 from two lanes to three lanes plus an auxiliary lane in each direction (see ***Figure II-10***). Outside widening would require the acquisition of 0.19 acres from within the property's historic boundary. The resource would be impacted for a distance of approximately 400 linear feet along the resource's western boundary, and, at its widest, the right-of-way sliver needed would be approximately 35 feet wide.. The January 10, 2008 Effects Determination letter from SHA to the MD SHPO (see **Appendix A**) determined the proposed improvements would have an adverse effect on Rose Hill Manor as a result of Alternates 6A/B or 7A/B.

Avoidance Option

There are no prudent or feasible options to avoid impacts to Rose Hill Manor, due to its location northeast of the US 15/Motter Avenue/Opossumtown Pike interchange. Shifting US 15 west and away from Rose Hill Manor would require reconstruction of the interchange which could potentially impact the Frederick Research Park and an apartment complex on the west side of US 15. Calculations of these impacts have not been completed, as the cost of reconfiguring the interchange would be substantial..

Measures to Minimize Harm

Measures to minimize impacts to the historic resource were discussed previously in **Section II.B.3.a** (Rose Hill Manor Historic Park) and include the use of steeper slopes and a retaining wall. Use of a 6:1 slope would have resulted in 0.58 acre of impact to Rose Hill Manor, an additional 0.39 acre over the 0.19-acre impact from using the 2:1 slope technique presented in the current design. The retaining wall option, discussed previously for the Rose Hill Manor Historic Park, would reduce park impacts to 0.01 acre. Installation of a retaining wall may not be compatible with the nature of the historic landscape of the resource. Additional techniques to minimize harm to the historic resource will be considered as part of the on-going Section 106 consultation effort.

Impact Summary for Rose Hill Manor							
Area of Resource	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost*
30 acres	0.58 acre	0.19 acre	0.39 acre	0.01 acres	0.57 acre	0.18 acre	$1,110,000
* Cost of wall is included in the retaining wall cost for Rose Hill Manor Historic Park.							

g. Birely-Roelkey Farmstead, F-3-134

Alternatives 6A/B and 7A/B would construct an interchange at US 15 and Biggs Ford Road, impacting the Birely-Roelkey Farmstead (see ***Figure II-15***). The interchange ramps and roadway connections will require a total of 13.42 acres from northeast corner of the farmstead.

The interchange configuration includes a northbound US 15 exit ramp and a northbound US 15 entrance loop ramp located in the southeast quadrant of the US 15 and Biggs Ford Road intersection; a new access driveway would be provided from Biggs Ford Road east of the proposed intersection. The area affected by the interchange is open field and pastureland located west of the farmstead home. The impacts occur along US 15 for approximately 1,300 feet prior to existing Biggs Ford Road and over 2,200 feet along Biggs Ford Road. The proposed roadway improvements would be located approximately 160 feet (northbound off ramp) and 620 feet (US 15 northbound) from the Birely-Roelkey Farmstead structure. Existing US 15 northbound is approximately 632 feet from the farmstead. The January 10, 2008 Effects Determination letter from SHA to the MD SHPO (see **Appendix A**) determined the proposed improvements would have an adverse effect as a result of Alternatives 6A/B or 7A/B.

Avoidance Option

One measure to avoid impacts to the Birely-Roelkey Farmstead involves reconfiguring the proposed US 15/Biggs Ford Road interchange northbound ramp locations to place both northbound ramps north of Biggs Ford Road in the northeast quadrant. This shift, however, would result in new impacts that would include the acquisition and relocation of four businesses and one residence currently located in the northeast quadrant. The avoidance option would be designed with similar pavement areas with the one exception being the increased length of access road. A residence located north of Sundays Lane would gain access via a driveway from Biggs Ford Road. The increased length of access road would increase the construction costs by $550,000.

Measures to Minimize Harm

Steeper slopes have been incorporated into the original design to reduce impacts of the US 15/Biggs Ford Road interchange. The original design incorporated the use of 2:1 slopes to minimize impacts to the farmstead to 13.42 acres. By utilizing 6:1 slopes, the impact to the farmstead would have been 14.71 acres. Installation of a retaining wall may not be visually compatible with the nature of the historic landscape of the resource and has not been designed. Additional techniques to minimize harm to the historic resource will be considered as part of the on-going Section 106 consultation effort.

Impact Summary for Birely-Roelkey Farmstead							
Area of Resource	Impact, 6:1 Slopes	Impact, 2:1 Slopes	Difference, 6:1 vs. 2:1	Retaining Wall	Difference, 6:1 vs. Wall	Difference, 2:1 vs. Wall	Wall Cost
30 acres	14.71 acres	13.42 acres	1.29 acres	--	--	--	--
-- Retaining wall was not considered because of the potential incompatibility with the historic farm.							

Table II-4: Avoidance Alternatives and Measures to Minimize Harm to Section 4(f) Resources

Resource	Resource Size	Alternatives 6A/B and 7A/B					
		Current Design (2:1 slope) Impacts	Avoidance Option	6:1 Slope Option	Retaining Wall	Figure Number	Map Sheet Location (AA/EA)
Parks and Recreation Areas							
Malcolm King Park	72.9 acres	0.75 acre	Ret. Wall	1.28 acres	0.0 acres	II-2	HWY-1
Morris Park	37.2 acres	0.21 acre	Ret. Wall	0.23 acre	0.0 acres	II-2	HWY-1
Seneca Creek State Park	6,290 acres	H- 6.93 acres T- 5.16 acres	None None	H-14.27 acres	H-1.65 acres	II-3	HWY-2+3 TRAN-4+5
Middlebrook Hill Park	11.5 acres	2.13 acres	None	2.86 acres	0.21 acres	II-3	HWY-3
North Germantown Greenway	300 acres	0.78 acre	None	1.40 acres	0.28 acres	II-4	HWY-4
Black Hill Regional Park	1,843 acres	8.61 acres	None	19.52 acres	4.09 acres	II-4	HWY-4+5
Little Bennett Regional Park	3,648 acres	0.29 acres	CL Shift	1.13 acres	0.05 acres	II-5	HWY-7
Urbana Fish Lake Management Area	70 acres	1.23 acres	CL Shift	2.42 acres	0.41 acres	II-6	HWY-8
Urbana Elementary School	21 acres	1.78 acres	None	1.98 acres	0.42 acres[1]	II-7	HWY-8
Urbana Community Park	20 acres	0.44 acre	None	0.55 acre	0.01 acre	II-7	HWY-9
Monocacy National Battlefield	1,647 acres	14.50 acres	None	23.63 acres	3.71 acres	II-8	HWY-9,10,11
Baker Park	53 acres	0.26 acre	None	1.08 acres	0.02 acre	II-9	HWY-13
Rose Hill Manor Historical Park	43 acres	1.04 acres	None	2.60 acres	0.16 acres	II-10	HWY-13,14
Historic Properties							
England/Crown Farm (M:20-17)	76 acres	T -3.60 acres	None	2.10 acres[2]	n/a	II-11	TRAN-2
Belward Farm (M:20-21)	107 acres	T -0.64 acres	Design mod.[3]	n/a	n/a	II-12	TRAN-3
Atomic Energy Commission Building (M:19-41)	109.2 acres	H – 2.97 acres T – 7.87 acres	None None	H-10.20 acres na	H-1.44 acres n/a	II-13	HWY-3 TRAN-5
Monocacy National Battlefield (F-3-42)	1,920 acres	12.52 acres	None	20.01 acres	3.50 acres	II-8	HWY-9,10,11
Schifferstadt (F-3-47)	1.5 acres	0.09 acre	Ret. Wall	0.67 acre	0.0 acre	II-9	HWY-13
Rose Hill Manor (F-3-126)	30 acres	0.19 acre	None	0.58 acre	0.01 acre	II-10	HWY-14
Birely-Roelkey Farmstead (F-3-134)	110.3 acres	13.42 acres	Design mod.[4]	14.71 acres	12.01	II-14	HWY-15

Impacts represent use of 1:2 slope design for roadway embankment.
All impacts are the result of right-of-way needs for highway alignment unless indicated as (H) for highway and (T) for transitway.
1 Using a retaining wall at Urbana Elementary School would eliminate interference with usual activities there.
2 A suggested design modification shifts the alignment to a less diagonal crossing of the Crown Farm and reduces impacts.
3 A shift in the location of the hiker-biker trail and a slight modification of the parking facility footprint would avoid all impacts to the resource.
4. Shifting the interchange design to the north would incur business relocations.

C. AVOIDANCE ANALYSIS

The No-Build Alternative (Alternative 1) completely avoids impacts to publicly owned public parks and recreation areas, and historic sites, but is not practical because it does not meet the project purpose and need.

Alternatives 6A/B and 7A/B will impact Section 4(f) properties as it provides improvements to an existing highway adjacent to that highway. To completely avoid Section 4(f) resources throughout the corridor, an avoidance alternative would (1) include the development of a new, parallel 32-mile highway corridor that serves the Montgomery and Frederick County communities currently served by I-270 and US 15 that avoids impacts to Section 4(f) resources, within the study limits, or (2) upgrade an existing parallel corridor, such as MD 355 to the east of I-270/US 15, without impacting Section 4(f) resources, in order to provide the safety and congestion improvements identified in the purpose and need. Upon initial review of these potential avoidance alternatives, it was noted that neither a new alignment nor an upgrade of the MD 355 alignment would be able to avoid the large parklands (Seneca Creek State Park, Black Hill Regional Park, Little Bennett Regional Park and Monocacy National Battlefield) that dominate the landscape of northern Montgomery and southern Frederick Counties. Moreover, new or improved alternative alignments through existing developed areas (such as Rockville, Gaithersburg, Germantown and Frederick) would cause massive impacts to the built environment that would result in severe problems of a magnitude that substantially outweigh the importance of protecting the Section 4(4) properties. Therefore, these total avoidance alternatives are not prudent or feasible due to the magnitude of new natural and socioeconomic impacts associated with their development when compared to the incremental impacts associated with widening the existing I-270/US 15 corridor.

On a resource-specific basis, slope adjustments, retaining walls and alignment shifts to avoid the use of land from individual Section 4(f) properties have been investigated where feasible and are presented in **Section B**.

D. LEAST OVERALL HARM ANALYSIS

SHA and MTA intend to pursue a *de minimis* finding for the following resources: Malcolm King Park, Morris Park, Seneca Creek State Park, Middlebrook Hill Neighborhood Conservation Area, North Germantown Greenway, Black Hill Regional Park, Little Bennett Regional Park, Urbana Lake Fish Management Area, and Urbana Community Park. The final Section 4(f) Evaluation will include the analysis of the alternatives included in the 2002 DEIS and those included in the 2009 AA/EA.

Measures to minimize harm have been investigated for the impacts of Alternatives 6A/B and 7A/B. The measures to minimize impacts to Section 4(f) resources for the highway components have included constructing steeper slopes or retaining walls to reduce property acquisition, reduced typical section widths (generally applied to shoulder widths), a combination of these measures, and shifting the highway centerline. The highway components include roadway widening and interchange improvements, which cannot be relocated to other areas in the corridor. An initial effort to minimize harm has been the incorporation of steeper slopes (2:1) into the highway design of the roadway and ramps. Estimates of retaining wall costs, as

provided in each resource discussion, are given in 2007 dollars. This information is included in **Section B**.

The measures to minimize impacts as a result of the transitway components also include the use of retaining walls to reduce property acquisition, relocation of or design refinements of transit facilities (i.e. stations, parking lots, ancillary facilities, etc.), and alternative alignment locations to reduce resource impacts. In sensitive areas, narrowing the transitway proposed typical section has already been incorporated into the original design for railroad design criteria and track center offsets.

Least overall harm does not only refer to the impacts/uses of Section 4(f) properties. A least overall harm analysis also includes the evaluation of impacts to natural and socioeconomic resources. A summary of the total impacts of the alternatives, including the alternatives evaluated in the 2002 DEIS, is shown in ***Table II-5***. ***Table II-6*** provides a summary of the preliminary least overall harm analysis for all of the alternatives. This analysis sets the framework for the presentation and analysis of all of the build alternatives, selection of a Locally Preferred Alternative, and completion of a Tier I Final Environmental Impact Statement and Section 4(f) Analysis that will culminate in a Record of Decision for the project.

Additional measures to minimize harm and/or to mitigate for both the highway and transit components of the alternatives may include:

- Providing replacement land of equal or greater natural resource and economic value as per Program Open Space and Section 6(f) funding requirements.
- Erosion and sediment control measures would be provided and strictly enforced to minimize water quality impacts.
- Use of stormwater management (SWM) Best Management Practices, including the potential use of underground SWM facilities, would be employed to control runoff.
- Impacted wetlands would be replaced.
- Vegetation mitigation, such as removal of non-native plant species and replanting of native plant species to create historic landscape buffer.
- Additional appropriate mitigation measures, such as landscaping with viewshed considerations (where applicable with respect to the resource), will be developed through coordination with the jurisdictional agency.
- Relocation of facilities or installation of new facilities within the resource boundaries, as appropriate, may be developed through coordination with the jurisdictional agency.

A Memorandum of Agreement (MOA) is being coordinated with the MD SHPO and the owners of the eight affected historic properties for adverse effects to cultural resources.

Some additional minimization/mitigation ideas have been discussed specifically with the NPS with regard to the impacts to the Monocacy National Battlefield. One such idea has been implemented - limiting the impacts to the west side of I-270 through a centerline shift, which is shown on the plan sheets and is included in this analysis. Other ideas discussed with the park service have included:

Table II-5: Impacts Comparison of All Build Alternatives

Alternative	Section 4(f) Resource Avoidance	Meets Purpose and Need	Wetland Impacts	Stream Impacts[1]	Floodplain Impacts	Farmland Soils Impacts	Forest Impacts	Property Impacts[2]	Historic Properties Adversely Effected[3]	Parks/ Recreation Areas Impacts
3A/B	No – Use of parks & historic properties	Yes	Yes – 10.7 acres	Yes – 14, 185 lf	Yes – 23 acres	Yes – 651.6 acres	Yes – 183 acres	Yes – 64-127 R; 4-11 B	7 properties	11 parks; 37 acres
4A/B	No – Use of parks & historic properties	Yes	Yes – 10.7 acres	Yes – 14, 185 lf	Yes – 23 acres	Yes – 651.6 acres	Yes – 183 acres	Yes – 64-127 R; 4-11 B	7 properties	11 parks; 37 acres
5A/B	No – Use of parks & historic properties	Yes	Yes – 11.6 acres	Yes - 16,331 lf	Yes – 24 acres	Yes – 682.1 acres	Yes – 199 acres	Yes – 64-128 R; 4-12 B	7 properties	12 parks; 44 acres
5C	No – Use of parks & historic properties	Yes	Yes – 10.7 acres	Yes - 13,407 lf	Yes – 21 acres	Yes – 547.3 acres	Yes – 180 acres	Yes – 127-385 R; 2-11 B	5 properties	13 parks; 48 acres
6A/B	No – Use of parks & historic properties	Yes	Yes – 15.6 acres	Yes - 24,204 lf	Yes – 28.4 acres	Yes – 1204.2 acres	Yes – 296 acres	Yes – 256-260 R; 13-43 B	7 properties; 43.28 acres	13 parks; 43 acres
7A/B	No – Use of parks & historic properties	Yes	Yes – 15.6 acres	Yes - 24,204 lf	Yes – 28.4 acres	Yes – 1204.2 acres	Yes – 296 acres	Yes – 256-260 R; 13-43 B	7 properties; 43.28 acres	13 parks; 43 acres

NOTES: *All impacts are based upon engineering designs with 2:1 slopes as shown on the Plan Sheets in the 2002 DEIS and 2009 AA/EA. Impacts do not include the transit O&M facilities, as they do not impact Section 4(f) properties.*

1. Stream impacts do not include ephemeral streams, as these were not identified for the DEIS alternatives. lf = linear feet

2. Numbers indicate relocations. R = residential; B = business

3. Number is based upon current evaluation, including newly evaluated resources. See Section B.

Table II-6: Preliminary Least Overall Harm Analysis

23CFR774.3(c)(1) Factor	Alternative 1 No-Build	Alternative 2 TSM/TDM	Alternatives Evaluated in the 2002 DEIS							AA/EA Alternatives			
			3A	3B	4A	4B	5A	5B	5C	6A	6B	7A	7B
i. The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property)	Least able to lower increasing noise impacts due to increasing congestion	Limited ability to lower increasing noise impacts due to increasing congestion	All build alternatives are mostly able to mitigate impacts through engineering minimizations, such as retaining walls and centerline shifts, and other measures, such as providing replacement land, enhancement of buffer areas, elimination of invasive species, re-vegetation of adjacent land. Alternative 5C may be slightly more able as it does not have transitway impacts. Appropriate measures will be considered as consultation with jurisdictional officer (JO) continues.										
ii. The relative severity of the remaining harm, after mitigation, to the protected activities, attributes or features that qualify each Section 4(f) property for protection	Not applicable	Not applicable	Because the locations of each alternative's impacts are substantially the same (the transitway alignment is identical for build Alternatives 3A/B, 4A/B, 5A/B, 6A/B and 7A/B, and the highway improvements are adjacent to the existing highway), the relative severity of remaining harm is similar for all alternatives except Alternative 5C, which would have less as it does not have transitway impacts.										
iii. The relative significance of each Section 4(f) property	Not applicable	Not applicable	The Monocacy National Battlefield is a National Historic Landmark, and, therefore is deemed more significant that the other resources because of its national significance. Most of the remaining resources have equal significance, and, therefore, the options are substantially equal for this analysis factor.										
iv. The views of the officials with jurisdiction over each Section 4(f) property	Not applicable	Not applicable	SHA and MTA are in continuing consultation with the jurisdictional officers of each resource, addressing issues as they are presented. Some of the views and issues already addressed are presented in the Consultation and Coordination section.										
v. The degree to which each alternative meets the purpose and need for the project	Does not meet purpose and need: continued and increasing congestion	Does not meet purpose and need: continued and increasing congestion	These build alternatives meet the project's purpose and need.										
vi. After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f)	Not applicable	Not applicable	Because the locations of each alternative's impacts are substantially the same (the transitway alignment is identical for build Alternatives 3A/B, 4A/B, 5A/B, 6A/B and 7A/B, and the highway improvements are adjacent to the existing highway), the relative magnitude of adverse impacts to resources not protected by Section 4(f) is similar for all alternatives except Alternative 5C, which would have less as it does not have transitway impacts. Regulated mitigation measures for natural resources will essentially mitigate all impacts to wetlands, streams, and forests. Relocations will be mitigated through the Federal relocation assistance program. Farmland soils impacts will not be mitigated and may be considered moderate.										
vii. Substantial differences in cost among the alternatives*	$0	$33	$2,662	$2,597	$2,662	$2,597	$2,955	$2,890	$2,519	$4,656	$4,329	$4,656	$4,329

NOTE: *Least overall harm analysis is not completed. This analysis sets the framework for the presentation and analysis of all of the build alternatives, selection of a Locally Preferred Alternative, and completion of a Tier 1 Final Environmental Impact Statement and Section 4(f) Analysis that will culminate in a Record of Decision for the project.*

** Capital costs are provided in millions of 2001 dollars for the DEIS alternatives and in millions of 2007 dollars for the AA/EA alternatives.*

- Removal of "waste" piles from the 1950s construction and the elimination of a borrow pit at the southwest corner of the I-270 bridge over the Monocacy River.
- Using underground stormwater management facilities to control runoff from I-270 through the battlefield.
- Installing boundary markers along the I-270 roadside that identify when one is passing through the battlefield.
- The use of noise-reducing paving on I-270 through the battlefield.
- Construction of a pedestrian bridge over I-270 to connect the two sections of the battlefield.

As coordination continues and the identification of a LPA draws nearer, additional suggestions may emerge for specific resources that may provide minimization or mitigation of the impacts to Section 4(f) properties.

E. CONSULTATION AND COORDINATION

Coordination and consultation has been ongoing with the NPS, MD SHPO, MDNR, M-NCPPC, the Frederick County Landmarks Foundation (FCLF), the Frederick County Department of Parks & Recreation, the Frederick County Historic Preservation Commission, the Frederick City Historic Preservation Commission, the General Services Administration (GSA) and the private owners of the properties that would be impacted by the project. Coordination has included requests for general information, submittal of cultural resources inventory, identification of park and cultural resource boundaries, and review of the proposed transportation improvements. Coordination will continue with these organizations throughout the National Environmental Policy Act (NEPA) and Section 106 processes that will extend through design and construction. Copies of coordination letters are included in **Appendix A** and descriptions of coordination meetings are summarized in the following. The correspondence chronicles the coordination activities of the project team with the Section 4(f) property owners.

Full Project Team coordination meetings are held on a quarterly basis to discuss current topics and to review the project's progress and issues. NPS, MD SHPO, M-NCPPC, and the City of Frederick are members of the Project Team and are invited to attend these regular quarterly meetings. In addition, individual meetings have been held with representatives of Section (9f) resources' owners to assure their continued involvement as impacts are identified and minimization/mitigation efforts continue.

The project team has conducted individual coordination with the NPS (Monocacy National Battlefield), MDNR (Seneca Creek State Park), M-NCPPC (Black Hill Regional Park), FCLF (Schifferstadt), GSA/DOE (Atomic Energy Commission Building), Johns Hopkins Real Estate (Belward Farm), Frederick County Division of Parks and Recreation (Rose Hill Manor), Spring Bank, LLC (Spring Bank), and Crown Farm Village (England/Crown Farm) regarding potential impacts to their facilities and to provide an overview of the transportation alternatives and potential impacts under consideration. ***Table II-5*** presents a list of coordination and consultation meetings that have taken place since publication of the 2002 DEIS. A number of these meetings include coordination for both the Section 106 and Section 4(f) process.

Table II-7: Section 106/Section 4(f) Coordination Meetings

Date	Attending	Issues Discussed
May 2, 2002	NPS, SHA	Potential impacts to Monocacy National Battlefield and potential minimization/mitigation efforts. NPS concerns are property acquisition and highway-generated noise. NPS suggested a pedestrian bridge over I-270 to link east and west portions of Park.
June 17, 2002	NPS, SHA	Potential impacts to Monocacy National Battlefield and potential minimization/mitigation efforts. NPS shared information regarding key vistas and sites for battlefield interpretation; potential impacts on the battlefield as a park and as a historic resource, and potential avoidance, minimization, and mitigation measures were discussed.
July 15, 2002	NPS, SHA	Potential impacts to Monocacy National Battlefield and potential minimization/mitigation efforts. Discussed additional ideas for mitigation, including westward shift of I-270.
July 31, 2002	NPS, SHA	Potential impacts to Monocacy National Battlefield and potential minimization/mitigation efforts. Discussed engineering feasibility of potential mitigation strategies.
October 3, 2002	NPS, SHA	SHA presented west shift of I-270; field walk to review four major areas of concern
December 10, 2002	NPS, SHA	Working meeting to develop consensus on suitable minimization/ mitigation plan
May 15, 2003	NPS, SHA	Discussed trailblazer signing
June 24, 2003	NPS, SHA	NPS reviewed their General Management Plan (GMP) with SHA and noted several issues.
June 22, 2004	NPS, SHA	Review of trailblazer signing, boundary issues, and other news
February 9, 2007	JHU, MTA	Discussions included a preview of development plans for Belward Farm and CCT optional route through the development A Community Planning Workshop was attended.
July 10, 2007	JHU, MTA	Continuing discussions of development plans for Belward Farm and CCT optional route through the development
October 1, 2007	JHU, MTA	Continuing discussions of development plans for Belward Farm and CCT optional route through the development
November 8, 2007	NPS, SHA	Potential impacts to Monocacy National Battlefield and potential minimization/mitigation efforts
December 11, 2007	NPS, SHA	Coordination meeting introducing ETL concept and restarting consultation process for AA/EA current effort. Discussions included pedestrian bridge over I-270, GMP, and tour of new Visitor Center.
February 15, 2008	NPS, SHA	Potential impacts to Monocacy National Battlefield and potential minimization/mitigation efforts
April 11, 2008	FCLF, SHA, MHT, City of Frederick, Frederick County	Discussions were held regarding the potential impacts to Schifferstadt, and possible minimization/mitigation; easements, acquisition and noise impacts were discussed.
May 9, 2008	M-NCPPC, MTA,	Johns Hopkins development of Belward campus
May 23, 2008	M-NCPPC, MTA, SHA	Johns Hopkins development of Belward campus
May 30, 2008	M-NCPPC, MTA	Johns Hopkins development of Belward campus
July 11, 2008	NPS, SHA	Potential impacts to Monocacy National Battlefield and potential minimization/mitigation efforts
July 18, 2008	JHU, MTA	Discussions included a preview of development plans for Belward Farm and CCT optional route through the development
July 18, 2008	England/Crown Farm, MTA	Discussions included a review of the development proposed for the property and potential alternative alignment of the CCT through the development

Table II-7: Section 106/Section 4(f) Coordination Meetings

Date	Attending	Issues Discussed
July 21, 2008	Spring Bank LLC, Birely-Roelkey, SHA	Discussions included potential impacts and potential minimization/mitigation efforts
July 25, 2008	Rose Hill Manor, SHA	Discussed potential impacts to Rose Hill Manor, including acquisition and noise impacts.
August 21, 2008	NPS, SHA	Potential impacts to Monocacy National Battlefield and potential minimization/mitigation efforts
September 5, 2008	Schifferstadt, Rose Hill Manor, SHA	Discussed potential impacts to Schifferstadt and Rose Hill Manor
September 24, 2008	NPS, SHA	Potential impacts to Monocacy National Battlefield and potential minimization/mitigation efforts
October 2, 2008	GSA/DOE, SHA, MTA	Discussed potential impacts to the Atomic Energy Commission Building, elements of the site that were important, and potential minimization/mitigation efforts.

Coordination with the NPS has occurred throughout the project. Coordination meetings were held on June 11, 2001 to review the proposed improvements through the battlefield and to discuss the potential impacts, and on November 1, 2001 to review NPS comments to the proposed improvements and their potential impacts to the battlefield.

The NPS, in their April 18, 2008 response to SHA's January 17, 2008 letter inviting the NPS to be a consulting party in the Section 106 process, indicated potential mitigation should include, among other suggestions, replacement lands contiguous to the battlefield, removal of non-native vegetation, and traffic noise reduction efforts. Traffic noise reduction suggestions included using a lower noise road surface, vegetative or hard sound barriers, and lowering speed limits through the battlefield. Viewsheds are also a concern of NPS and will be considered as the NEPA process continues.

Coordination with MDNR has occurred throughout the project with requests for information and verification of resource boundaries. On July 17, 2001, the Project Team met with MDNR to review the possible impacts to Seneca Creek State Park from the improvements. MDNR indicated that lands needed for the proposed improvements should be replaced on a 1:1 basis and the land should be contiguous to the state park.

Coordination with M-NCPPC has occurred throughout the project. A coordination meeting was held on September 5, 2001 to discuss potential impacts to Black Hill Regional Park. M-NCPPC indicated they would prefer equal right-of-way impacts to both the east and west sides of I-270 along the park boundary. M-NCPPC also commented that right-of-way mitigation should include replacement lands on a 1:1 basis contiguous to the park.

Coordination regarding impacts to the Schifferstadt museum and grounds has evaluated the issues of property ownership (a potential SHA easement) and noise impacts to both indoor and outdoor programs held there. Coordination regarding impacts to the Rose Hill Manor Historic Park and Rose Hill Manor have included meetings with the City of Frederick and with the MD SHPO regarding NRHP boundary considerations.

APPENDIX A

CONSULTATION LETTERS

List of Correspondence

Date	From	To	Subject	Page
6/13/02	Frederick County Dept. of Planning & Zoning	SHA	Historic preservation concerns with the project in Frederick County.	1
2/12/07	SHA MHT		Determinations of Eligibility for historic structures (AEC and 2 wetland mitigation sites) in the project area (with attachments 1, 2, and 4).	4
4/13/07 M	HT	SHA	Do Not Concur with February 12, 2007 determinations of eligibility. Concur with AEC (eligible) and 8374 Woodville Road (not eligible). Do not concur with 8435 Woodville Road (eligible)).	16
1/10/08	SHA MHT		Determination of adverse effect letter (with attachments 2, 3, 4 and 5)	18
6/26/08 M	HT	SHA	Concurs that the project will have an adverse effect on historic resources. Concurs with SHA's revised boundary for Belward Farm to 107 acres. Lists resources within the project APE.	55
1/17/08	SHA	NPS (Ms. Rust)	Determination of adverse effect to Monocacy National Battlefield (with attachments 4 and 5)	58
1/17/08	SHA	NPS (Ms. Trail)	Determination of adverse effect to Monocacy National Battlefield (with attachment 3)	65
3/18/08	SHA	USDI NPS National Capital Region	Apprising the USDI National Capital Region of adverse effects on Monocacy National Battlefield	72
4/18/08	USDI National Park Service	SHA	Response to finding of adverse effect on Battlefield; suggestions for possible mitigation of effects. Asks SHA to include additional consulting parties.	75
2/1/08	Frederick County Landmarks Foundation	SHA	Expressing concerns about the impacts to Schifferstadt	78
2/25/08	SHA	Frederick County Landmarks Foundation	Response to concerns over impacts on Schifferstadt.	80
2/7/08	Frederick County Historic Preservation Commission	SHA	Concurrence with adverse effect determinations; agree to join as consulting party.	83
2/8/08	City of Frederick Historic Preservation Commission	SHA	Historic preservation concerns with the project in the City of Frederick.	84
2/19/08	Frederick County Parks & Rec.	SHA	Concerns with historic preservation and park impacts to Rose Hill Manor and Historical Park.	85
4/17/08	GSA	SHA	Agree to join as consulting party for AEC adverse effect	88
6/20/08	SHA	Mr. May - Crown Village Farm LLC	Requesting consultation regarding adverse effect to England/Crown Farm (without attachments).	89

List of Correspondence

Date	From	To	Subject	Page
7/22/08	Crown Village Farm, LLC	SHA	Accepting the invitation to be a consulting party.	93
6/20/08	SHA	Mr. & Mrs. Thatcher – Birely-Roelkey Farm	Requesting consultation regarding adverse effect to Birely-Roelkey Farmstead (without attachments).	94
6/20/08	SHA	Mr. McDonough & Mr. Justus – JHU Belward Farm	Requesting consultation regarding adverse effect to Belward Farm (without attachments).	97
6/20/08	SHA Spri	ng Bank LLC	Requesting consultation regarding adverse effect to Spring Bank (without attachments).	101
7/25/08	Dan Ryan Builders (Spring Bank)	SHA	Regarding increased noise levels; expressing preference for a landscaped berm rather than a noise wall to lower noise impacts.	104
6/23/08	SHA	Frederick County Landmarks Foundation	Requesting consultation regarding adverse effect to Schifferstadt	105
7/11/08	FHWA	NPS (Ms. Rust)	Informing the National Historic Landmark Philadelphia Region that the project will adversely affect Monocacy National Battlefield and summarizing the consultation to date (without attachments).	108
9/22/08	Civil War Preservation Trust	SHA	Accepting the invitation to be a consulting party.	113
7/22/96	City of Gaithersburg	MDOT	Regarding parks within the City of Gaithersburg and their significance and funding; also talked about "Metropolitan Grove Road Park" and its significance as a part of planned development (TOD).	115
4/18/96	Fred Co DPW	SHA	Regarding the significance and usage of Rose Hill Manor Park and Urbana Community Park.	116
2/21/02 SH	A	SHA	Notes from the Project Team meeting with DNR on 7/17/01 to review potential impacts to Seneca Creek State Park and North Germantown Greenway and current schedule to completion of the DEIS.	117
2/21/02 SH	A	SHA	Notes from the Project Team meeting with M-NCPPC on 9/5/01 to review potential impacts to Black Hill Regional Park and current schedule for the DEIS.	119
3/22/02 M	DNR	SHA	Regarding the significance and uses of Urbana Lake Fish Management Area and Seneca Creek State Park.	121
4/8/02 M	-NCPPC	MDOT	Comments about project impacts on Middlebrook Hill NCA, Black Hill Regional Park, North Germantown Greenway and Little Bennett Regional Park; suggestions for potential mitigation efforts.	122

DEPARTMENT OF PLANNING AND ZONING
FREDERICK COUNTY, MARYLAND

Winchester Hall 12 East Church Street Frederick, Maryland 21701 (301) 694-1134

June 13, 2002

Ms. Cynthia D. Simpson, Deputy Director
Office of Planning and Preliminary Engineering
Maryland State Highway Administration
P. O. Box 717
Baltimore, Maryland 21203-0717

Re: Project No.FR 192B11
I270/US 15 Multi-Modal Corridor Study
Montgomery and Frederick Counties

Dear Ms. Simpson:

I am responding with comments on the subject project as Historic Preservation Planner in the Frederick County Planning Department. I also serve as staff to the Frederick County Historic Preservation Commission (HPC), but this project proposal has not been presented to the Commission for review at its regular monthly meetings due to scheduling conflicts. The project will be presented at the first available meeting, which may be the July or August HPC meeting. However, due to the scheduled meeting on June 17 at the Monocacy National Battlefield for a discussion of the impacts of the project on the Battlefield, I felt it was important to forward my own comments at this time and separately from the HPC. Ms. Mary Barse has informed me that these comments would be accepted, although well past the requested March 20 response date.

F-3-42 Monocacy National Battlefield

The State Highway Administration's (SHA) determination that Alternates 3 A/B, 4 A/B, and 5 A/B have adverse effects on the Battlefield is supported by the accompanying documentation. The mitigation measures suggested would have been easier to understand had there been concept drawings of what the retaining wall would look like. Given that it varies in height from 2 to 7 feet, this is a feature that would definitely have a visual impact on the Battlefield. Although it may result in less required acquisition of land, especially when combined with the reduced inside shoulder width and steeper slopes, the visual impact of such a structure in any material would, in my opinion, be so great a change over a long corridor through the National Historical Park, it would be unacceptable. I urge SHA to work closely with all interested parties to develop a better solution to the needs for the corridor in the vicinity of the Battlefield.

F-3-47 Schifferstadt

Although Schifferstadt, a non-profit-owned museum, is located within the City of Frederick and is not under the jurisdiction of this Planning Department, it is one of the defining architectural landmarks of Frederick County and a well-known architectural museum that is a highly visited tourism and educational destination. Its treatment in this project is therefore of interest to this office.

The elimination of the vegetative buffer and hedgerow is an adverse visual impact that requires replacement of the vegetation at a minimum. Have other alternatives using parts of the right of way on the west side of US 15 been considered? This would involve complicated engineering formulas to make this work with the existing Rosemont Avenue overpass. However, the significance of the resource and its strong economic role in tourism demand extraordinary measures.

F-3-43 Rose Hill Manor

Rose Hill Manor, a County-owned historical park, is located in the City of Frederick. Like Schifferstadt, it is one of the most visited historic sites in the vicinity of Frederick, and its setting is crucial to its recreational use and historical significance.

While the acquisition of right of way along the western edge of the park property would not impact historic structures, the visual setting of the manor house and its outbuildings as a group with an open space buffer is part of its interpretive value. The "grasslands" and the "low-quality wooded buffer" of the hedgerow may not be striking features to the observer from US 15, but they convey a measure of the original agricultural purpose and rural setting of the property. To not suggest that replacing a vegetative buffer as a mitigation action does no justice to the setting. The retaining wall of 2 feet, as at the Monocacy National Battlefield, is not a good alternative mitigation. More discussion is needed of other alternatives that would not impact the visual and significant features of Rose Hill Manor Park.

F-3-134 Birely-Roelkey Farmstead

The effect of Alternates 3A/B, 4A/B, and 5A/B/C on the setting of the farmstead is to place the ramp 160 feet from the principal dwelling of the farmstead group and to alter the historic entrance location to the farmstead from the west to a new access road from Biggs Ford Road on the north. In addition, a minimum of 13. 69 acres of the historic agricultural setting of the farmstead would be lost. In my opinion, this design is an unacceptable impact on the farmstead. The possible mitigation of a redesigned diamond interchange was not accompanied by drawings showing what this would look like. The second redesign mitigation suggestion of placing the ramp in the northeast quadrant of the intersection requiring the acquisition of three businesses does not seem an economically viable alternative. Further discussion with all interested parties to find other solutions is suggested.

I look forward to meeting with SHA's team members, the National Park Service representatives, and other interested parties on June 17 at the Monocacy National Battlefield. If you have questions or comments about the above statements, please contact me at 301-696-2958 or by Email at jdavis@fredco-md.net.

Yours very truly,

Janet L. Davis

Janet L. Davis
Historic Preservation Planner

Cc: G. Bernard Callan, Jr., Chair,
Frederick County Historic Preservation Commission
Jim Gugel, Transportation Planner, Frederick County Planning Department
Elizabeth J. Cole, Maryland Historical Trust
Mary F. Barse, SHA-PPD
Rita M. Suffness, SHA-PPD

Martin O'Malley, *Governor*
Anthony Brown, *Lt. Governor*

SHA State Highway Administration

John D. Porcari, *Secretary Designate*
Neil J. Pedersen, *Administrator*

MARYLAND DEPARTMENT OF TRANSPORTATION

February 12, 2007

Re: Project No. FR192B11
I-270/US 15 Multi-Modal Corridor Study
Montgomery and Frederick Counties, Maryland
USGS *Frederick, Urbana, Germantown* and *Rockville* 7.5" Quadrangles

Mr. J. Rodney Little
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Mr. Little:

Introduction and Project Description

This letter serves to inform the Maryland Historical Trust (MHT) of the Maryland State Highway Administration's (SHA) eligibility determinations for historic standing structures and to provide a progress report for the proposed Project No. FR192B11. The project involves SHA's multi-modal studies for highway improvements along I-270 and US 15 in Montgomery and Frederick Counties respectively, and for the construction of the Corridor Cities Transitway (CCT) consisting of either Bus Rapid Transit (BRT) or Light Rail Transit (LRT) on a separate alignment in Montgomery County. SHA has been in consultation with MHT about this project since the early 1990s. On February 15, 2002, SHA determined that the project would have an adverse effect on historic properties, including standing structures. The project was dormant for several years, but in 2006, SHA began new technical studies. The passage of time and the relocation of the CCT BRT/LRT line in several areas require that SHA identify historic standing structures that had not been previously evaluated.

SHA is also investigating several new wetland mitigation sites in Frederick County **(Attachment 1)**. Wetland mitigation Area 19 totals 52 acres, straddling Woodville Road on two branches of the North Fork of Linganore Creek. Area 20 totals 32 acres, and straddles Emerson Burrier Road on Talbot Branch of the North Fork of Linganore Creek. Although not yet clearly defined, work in both areas is expected to involve wetland mitigation, wetland enhancement, and stream restoration.

Funding

Federal funds are anticipated for this project.

Area of Potential Effects

In determining the Area of Potential Effects (APE) for this project, SHA considered possible visual, audible, and/or physical impacts to historic properties, including standing structures and archeological sites. The project will require additional right-of-way, as well as permanent and temporary easements. For archeology, the APE is defined by the anticipated limits of ground disturbance within proposed and existing right-of-way and/or easements. SHA has defined the APE for the historic standing structures by considering the current level of development in both Frederick and Montgomery Counties and the likely visual, physical and audible impacts that new highway and CCT BRT/LRT construction would have on identified standing historic properties, as indicated on the attached SHA quadrangle maps for Germantown and Libertyville (Attachment 2).

Identification Methods and Results

Potentially significant architectural and archeological resources were both researched as part of the historic investigation instigated by the proposed I-270/US 15 Multi-Modal Study.

Architecture: SHA Architectural Historian Anne E. Bruder consulted the SHA-GIS Cultural Resources Database, MIHP forms, county histories and photographs at the MHT, SHA and Enoch Pratt libraries, and conducted field visits on June 6, October 2, and November 14, 2006. SHA conducted a separate field visit on September 20, 2006 to survey the two wetland mitigation sites near Unionville in Frederick County. SHA has identified three historic standing structures through these investigations: the Atomic Energy Commission Building (MIHP No. M:19-41), 8374 Woodville Road (MIHP No. F-8-160) and 8435Woodville Road (MIHP No. F-8-161). We have included these historic standing structures because they stand within areas that are included in the project's APE. SHA has determined that the Atomic Energy Commission Building is eligible for inclusion in the National Register of Historic Places (NRHP), while 8374 Woodville Road and 8435 Woodville Road are not eligible for the NRHP.

The Atomic Energy Commission (AEC) Building served as the headquarters for the Atomic Energy Commission, an independent federal commission which oversaw the nuclear sciences, between 1957 and 1975. From 1946 until 1975, the AEC either conducted "research and development" programs, or regulated the research and development of nuclear weapons, propulsion reactors, and technology for scientific, medical and industrial purposes at private and government facilities throughout the country. The AEC Building was also the locus of President Dwight Eisenhower's "Atoms for Peace" program. One architecture and engineering firm had been associated with designing other facilities used by the Manhattan Project or the AEC. Voorhees, Walker, Smith & Smith, Architects and Engineers, designed the laboratory space at Columbia University for the Manhattan Project in 1942, and also designed two laboratories for

the AEC. In 1955 the AEC chose the firm to design the AEC headquarters building in Germantown, Maryland. The construction of the building provided a public face and a single location for the "Atoms for Peace" program, which provided peaceful uses of the atom for the American public. The attached MIHP and DOE forms fully explain and document the building's significance (Attachment 3).

As explained more fully in Attachment 3, SHA has determined that the AEC Building is eligible for the National Register of Historic Places (NRHP) under Criterion A because of its association with the development of new nuclear sciences from 1957 to 1975. Also, the AEC Building is eligible for the NRHP under Criterion A as the first post-World War II government agency to be located outside both Washington, DC's monumental core and the federal buildings that were constructed in suburban locations during the 1930s. The AEC Building is also eligible for the NRHP under Criterion C, as an example of a mid-twentieth century office building designed by Voorhees, Walker, Smith & Smith, a prominent architecture firm from New York City. Construction began in 1956 and was completed in 1958. The building's design exemplifies the well-planned office and laboratory buildings for which the firm was known.

The AEC Building also meets the requirements for Criterion Consideration G. Although the building itself is just fifty years of age, the significant activities that occurred within the building extend to 1975. During this period more than one hundred nuclear power plants were constructed or planned for construction in the United States. The United States Navy and Army also benefited from these developments, because the AEC assisted the services in designing nuclear power plants for military bases, as well as for powering submarines and aircraft carriers. Medical treatments for cancer were also developed and overseen by the AEC. Although not all of the technologies were as successful or well received as the scientists hoped, Americans benefited from military, utility and medical applications based on nuclear sciences. Additional research did not identify significance under NRHP Criterion B, while Criterion D was not investigated as part of this study. The historic boundary is confined to Tax Parcel 615 as found on Montgomery County Tax Map EU562.

8374 Woodville Road in Frederick County is a single family dwelling that may be associated with the Shrinerea Mill. The mill was destroyed in 1926 and the house has been altered. There are also two outbuildings associated with the dwelling, a barn and a machine shed. Due to alterations, 8374 Woodville Road lacks integrity of design, setting, materials, workmanship and association. Research conducted did not identify specific associations with events or persons of local, state or national significance and 8374 Woodville Road is not eligible under NRHP Criteria A or B. Due to the lack of integrity, 8374 Woodville Road is not eligible under NRHP Criterion C. Criterion D was not addressed as part of this study. The historic boundary is confined to Frederick County Tax Map 61, Parcel 126.

8435 Woodville Road in Frederick County began as a late eighteenth century agricultural property which continued to develop during the nineteenth and twentieth centuries. The property contains a house, slave quarters, a barn, a milk house and several mid-to-late twentieth century outbuildings. Due to alterations to the dwelling and the construction of noncontributing outbuildings, 8435 Woodville Road lacks integrity of design, materials, workmanship and association. Research conducted did not identify associations with events or persons of local, state or national significance and 8435 Woodville Road is not eligible under NRHP Criteria A or B. Due to the lack of integrity, 8435 Woodville Road is not eligible under NRHP Criterion C. Criterion D was not investigated as part of this study. The historic boundary is confined to Frederick County Tax Map 61, Parcel 166. Maryland Inventory of Historic Properties and DOE forms with photographs, negatives and maps are included as Attachment 3, while the Eligibility Table is included as Attachment 4.

SHA and MHT have previously agreed that the following historic standing structures are listed in or eligible for the NRHP:

England/Crown Farm (MIHP No. M:20-7)
Belward Farm (MIHP No. M:20-21)
Billy King Farm (MIHP No. M:20-32)
Monocacy Battlefield (MIHP No. F-3-42)
Spring Bank (MIHP No. F-3-22)
Rose Hill Manor (MIHP No. F-3-42)
Schiefferstadt (MIHP No. F-3-47)
Birely-Roelkey Farm (MIHP No. F-3-134)

Once the technical studies are completed, SHA will be prepared to identify impacts and assess project effects on these standing historic properties. We will also reopen the discussions with the previously identified consulting parties, including the National Park Service and the Advisory Council on Historic Preservation.

Archeology: SHA Archeologist Carol A. Ebright assessed the archeological potential of wetland mitigation Areas 19 and 20 through examination of the SHA-GIS Cultural Resources Database, historic and environmental mapping, aerial photographs, and various secondary sources. A field visit was made on September 6, 2006. Archeological re-assessment of the larger I-270 mainline and CCT BRT/LRT corridors remains to be completed.

There are no recorded archeological sites in either Area 19 or 20, nor has either area been previously surveyed. One nearby previously recorded site (18FR412) is located to the north along the North Fork of Linganore Creek and consists of a dense prehistoric rhyolite lithic scatter.

Both project areas are located in the Piedmont physiographic province and contain mixtures of well-drained to poorly drained soils. A metarhyolite source may occur in Area 19.

Nearby Unionville was in place by the late 1830s (Burr 1839), although Kenny (1984) suggests that a village with a stone tavern existed here as early as the late 1700s. Early roads into both areas appear to be mapped in 1808 (Varle). Ancestral Woodville Road and Emerson Burrier Road are clearly shown by the second quarter of the nineteenth century (Lucas 1836, 1841).

Area 19 contained the Shrinerea Mill, constructed in 1805 by Peter Shriner (Varle 1808, McGrain n.d.). A subsequent owner, Isaac Nicodemus, tore down the mill and built a new one (McGrain n.d.), which is shown with a long raceway on Weldon Branch in 1873. The mill burned in 1926 (McGrain n.d.). By 1945 (USGS), no structures are shown in Area 19.

In 1818, the Galloway tract on Talbots Branch, which probably included part of Area 20, contained a "dwelling house, barn, good springs and fencing." Two structures were in or near Area 20 in the later nineteenth century (Bond 1858, Lake 1873). One structure remained in 1945 (USGS) and last appears on a 1971 photorevision of the Libertytown quadrangle.

A field visit to Areas 19 and 20 was made on September 6, 2006 by SHA Archeologist Carol A. Ebright. A structure in the southwest quadrant of Woodville Road and Emerson Burrier Road (8374 Woodville Road) immediately adjacent to Area 19, is possibly the same residence mapped in 1858 and 1873. A pull-out adjacent to the residence has a stone wall embedded in the embankment, potentially the remnant of an earlier structure. No obvious surface evidence of former mill structures remain in Area 19, although silted-in raceways appear to be present both north and south of the stream. These races are well-defined on recent aerial photographs. The junction of the southern tailrace and Weldon Creek was mapped in 1873 to be immediately west of the bridge on Woodville Road. This area is now a wider pool within the stream bed.

The field visit showed that no residential structures remain in Area 20. The location of a structure shown east of the road in both 1858 and 1873 may be marked by a leveled off area near the base of a hill. A structure shown west of the road in 1858 through at least 1971 is no longer extant, although stonework visible through fencelines may indicate its former location on the property. A modern, metal, open-sided shed is currently present on this property. Numerous rock outcrops are visible.

Both Areas 19 and 20 have high potential for historic archeological remains related to nineteenth century residential occupation, and Area 19 is also likely to contain remnants of several early milling industries. Better drained soils in the project areas have high potential for

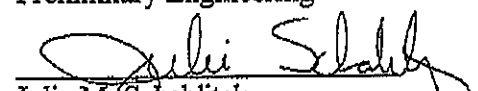
prehistoric archeological sites, especially near potential rhyolite sources in or near Area 19. Phase I archeological survey is recommended. This project will be re-assessed once specific wetland mitigation activities are known.

Review Request

Please examine the attached maps, forms and Eligibility Table. We request your concurrence by **March 13, 2007** that the Atomic Energy Commission Building is eligible for the NRHP, while 8374 Woodville Road and 8435 Woodville Road are not eligible for the NRHP. By carbon copy, we invite the U.S. Department of Energy, the General Services Administration, the Frederick County Historic Preservation Commission, the Montgomery County Historic Preservation Commission, Montgomery Preservation Inc., and the Frederick County Historical Trust, Inc. to provide comments and participate in the Section 106 process. Pursuant to the requirement of the implementing regulations found at 36 CFR Part 800, SHA seeks their assistance in identifying historic preservation issues as they relate to this specific project (see 36 CFR §800.2(c)(4) and (6), and §800.3(f) for information regarding the identification and participation of consulting parties, and §800.4, and §800.5 regarding the identification of historic properties and assessment of effects). For additional information regarding the Section 106 regulations, see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact the Maryland State Highway Administration or the Maryland Historical Trust). If no response is received by **March 13, 2007**, we will assume that these offices decline to participate. Please contact Ms. Anne E. Bruder at 410-545-8559 (or via email at abruder@sha.state.md.us) with questions regarding standing structures for this project. Ms. Carol A. Ebright may be reached at 410-545-2879 (or via email at cebright@sha.state.md.us) with concerns regarding archeology.

Very truly yours,

Bruce M. Grey
Deputy Director
Office of Planning and
Preliminary Engineering

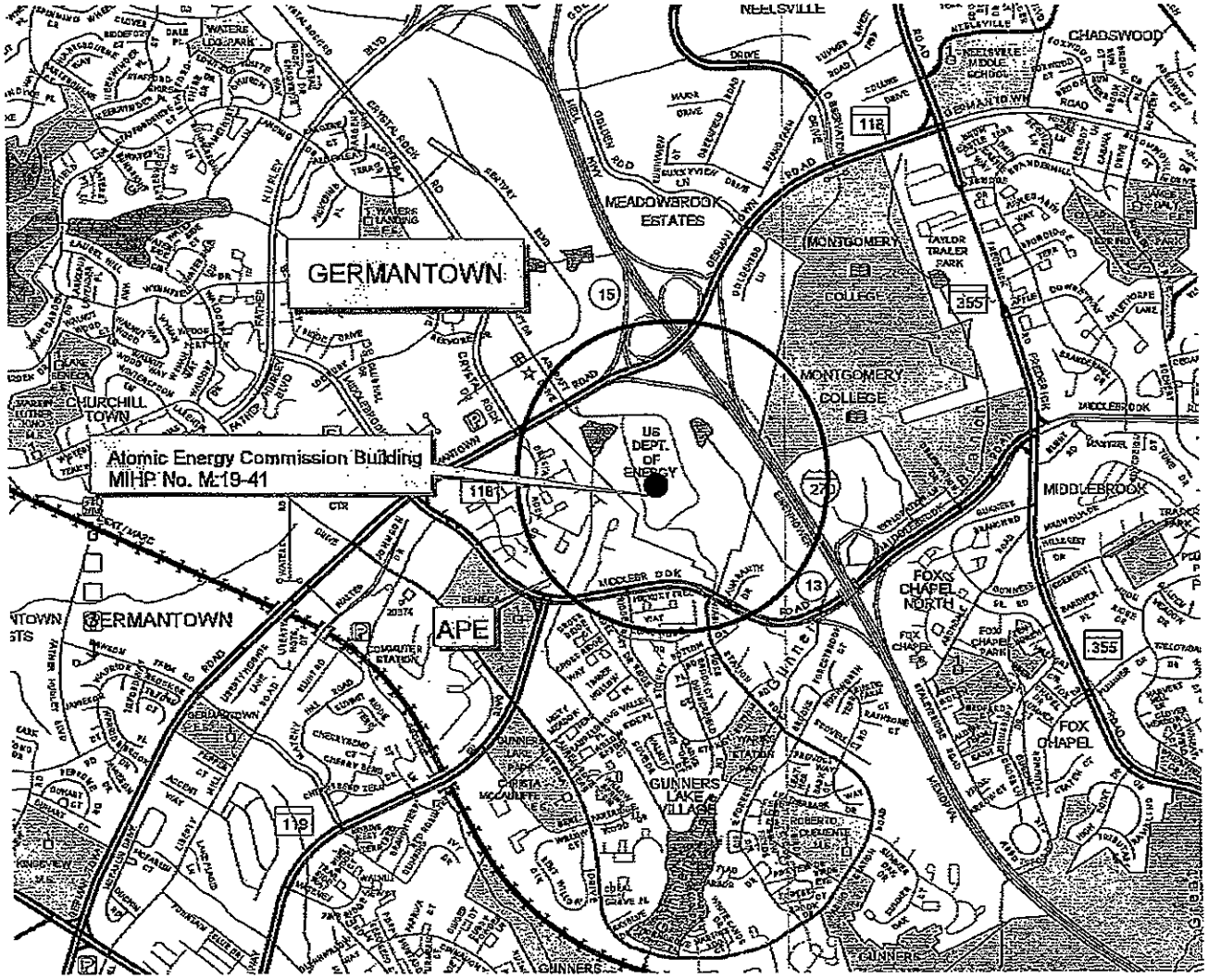
by: 
Julie M. Schablitsky
Cultural Resources Team Leader
Project Planning Division

Attachments: 1) Project Location Maps
2) APE Maps
3) MIHP and DOE Forms
4) Eligibility Table

cc: Ms. Anne E. Bruder, SHA-PPD (w/Attachments)
Mr. Ray Compton, Frederick County Historical Trust, Inc. (w/Attachment 3)
Ms. Janet Davis, Frederick County Historic Preservation Commission (w/Attachment 3)
Ms. Carol A. Ebright, SHA-PPD (w/Attachments)
Ms. Anne Elrays, SHA-PPD (w/Attachments)
Mr. Wayne Goldstein, Montgomery Preservation, Inc. (w/Attachment 3)
Mr. F. G. Gosling, U.S. Department of Energy (w/Attachment 3)
Mr. Brian Horn, RKK (w/Attachments)
Mr. Dan Johnson, FHWA (w/Attachments)
Mr. Rolando Rivas-Camp, AIA, General Services Administration (w/Attachment 3)
Dr. Julie Schablitsky, SHA-PPD (w/Attachment 4)
Mr. Russell Walto, SHA-PPD
Ms. Gwen Marcus Wright, Montgomery County Historic Preservation Commission (w/Attachment 3)

ATTACHMENT 1A

I-270/US 15 Multi-Modal Study
Location Map



USGS Topo Quad Index

Roads

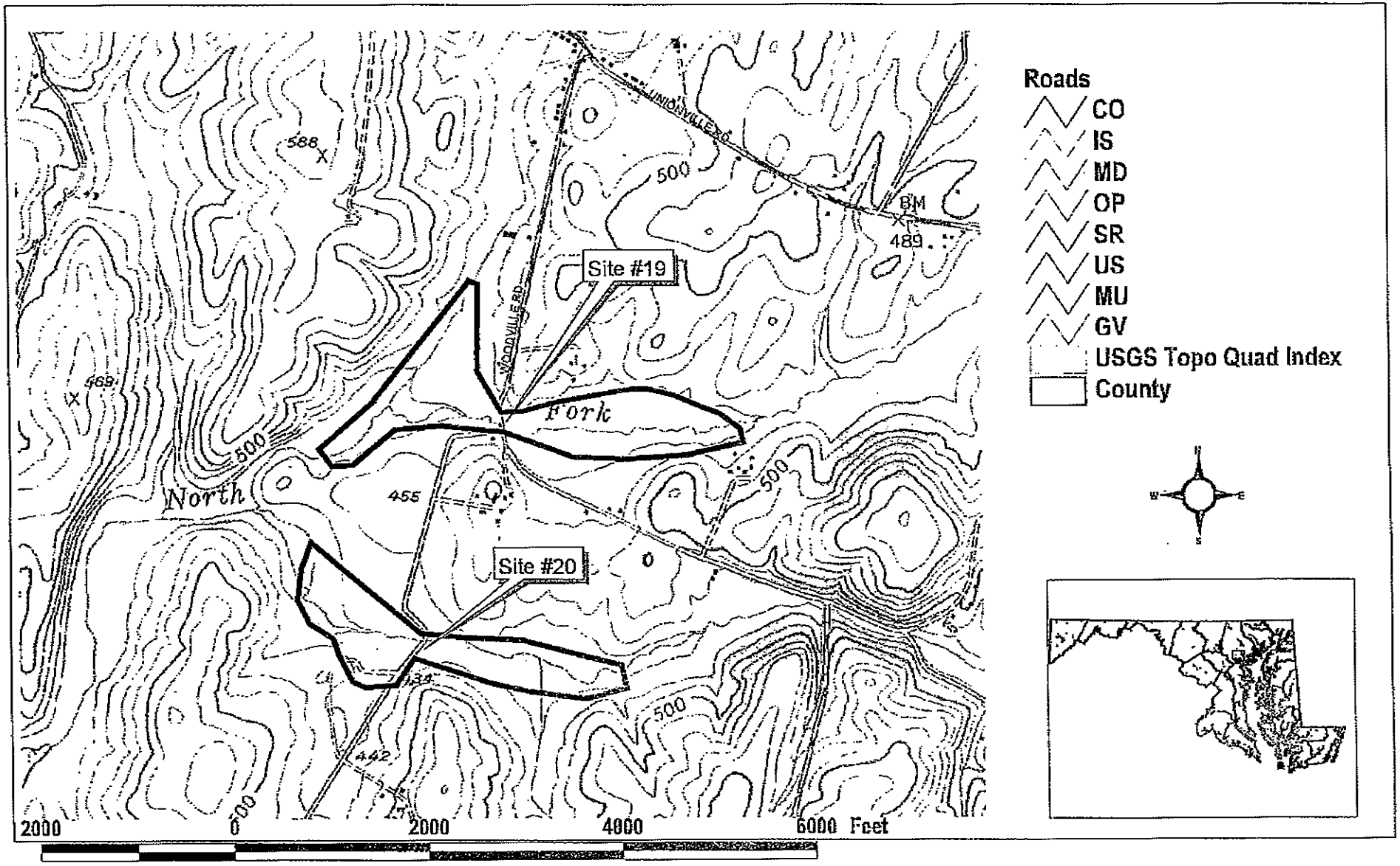
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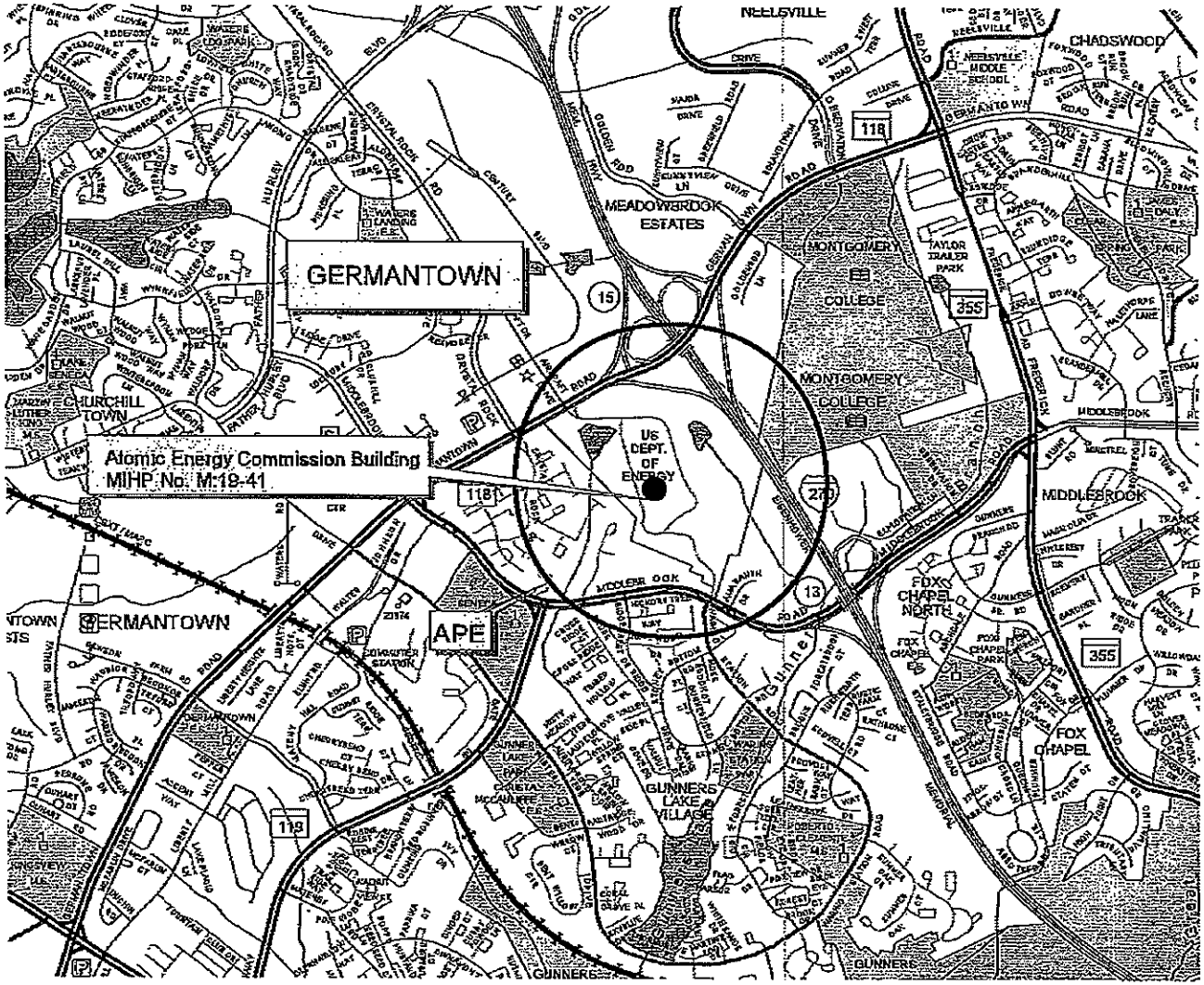
I-270/US 15 Multi-Modal Study
Wetland Mitigation Site #19 and Site #20

ATTACHMENT 1B



ATTACHMENT 2A

I-270/US 15 Multi-Modal Study
APE Map



USGS Topo Quad Index

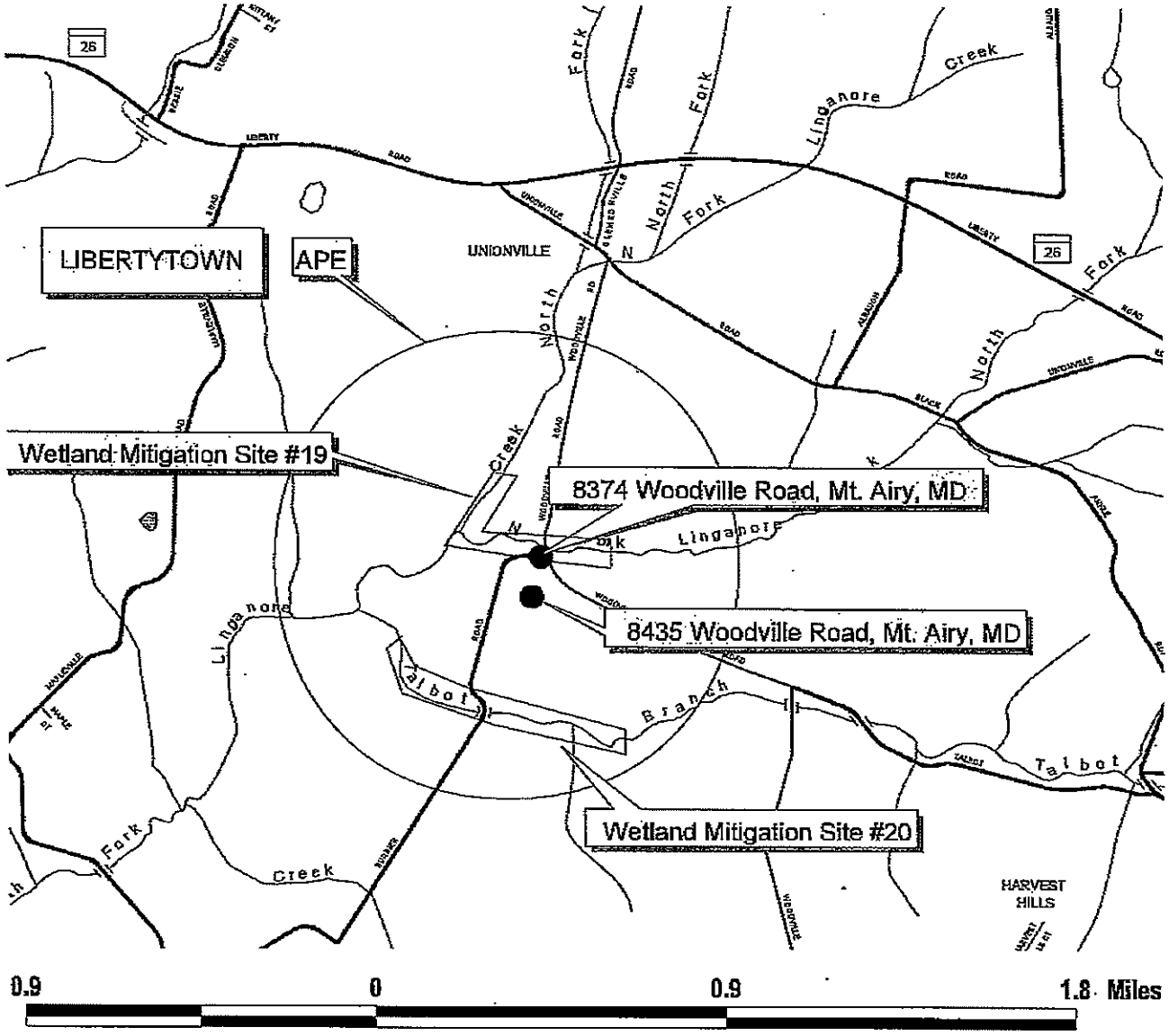
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ATTACHMENT 3

I-270/US 15 Multi-Modal Study
Wetland Mitigation Sites 19 and 20
APE Map



USGS Topo Quad Index

Roads
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Attachment 5: ***Eligibility/Status Table***

Project Name: I-270/US 15 Multi-Modal Study **February 5, 2007**

Resource	Type	SHA NR Determination	SHPO Opinion	Alternate	Attachment	Remarks
Atomic Energy Commission Building, MIHP No. M:19-41	**S**	**NR**	**Requested 2/2007**	**CCT and I-270 Mainline**	**3**	
8374 Woodville Road, MIHP No. F-8-160	**S**	**X**	**Requested 2/2007**	**Wetland Mitigation Site for I-270**	**3**	
8435 Woodville Road, MIHP No. F-8-161	**S**	**X**	**Requested 2/2007**	**Westland Mitigation Site for I-270**	**3**	

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)
NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)
SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion
Bold rows indicate review action requested

1160

Concurrence with the MD State Highway Administration's Determination(s) of Eligibility and/or Effects

Project Number: FR192B11 **MHT Log No.** 200700504
Project Name: I-270/US 15 Multi-Modal Corridor Study
County: Montgomery and Frederick Counties
Letter Date: February 12, 2007

The Maryland Historical Trust has reviewed the documentation attached to the referenced letter and concurs with the MD State Highway Administration's determinations as follows:

Eligibility (as noted in the Eligibility Table [Attachment 5):
- [ ] Concur
- [X] Do Not Concur

Effect (as noted in the Effects Table [N/A]):
- [ ] No Properties Affected
- [ ] No Adverse Effect
- [ ] Conditioned upon the following action(s) (see comments below)
- [ ] Adverse Effect

Agreement with FHWA's Section 4(f) criteria of temporary use (as detailed in the referenced letter, if applicable):
- [ ] Agree

Comments:
SEE ATTACHED CONTINUATION SHEET

By: _____ 4-13-07
MD State Historic Preservation Office/ Date
Maryland Historical Trust

Return by U.S. Mail or Facsimile to:
Dr. Julie Schablitsky, Cultural Resources Team Leader, Project Planning Division,
MD State Highway Administration, P.O. Box 717, Baltimore, MD 21203-0717
Telephone: 410-545-8870 and Facsimile: 410-209-5004

Concurrence with the MD State Highway Administration's Determination(s) of Eligibility and/or Effects

CONTINUATION SHEET #1
Maryland Historical Trust Comments

Project Number: FR192B11 **MHT Log No.** 200700504
Project Name: I-270/US 15 Multi-Modal Corridor Study

The Maryland Historical Trust (Trust) provides the following comments in addition to the concurrence indicated on the previous page:

- We concur with SHA that the following resource is eligible for listing in the National Register of Historic Places:

  Atomic Energy Commission (MIHP No. M: 19-41)

- We concur with SHA that the following resource is NOT eligible for listing in the National Register of Historic Places:

  8374 Woodville Road (MIHP No. F-8-160)

- We do not concur with SHA regarding the National Register eligibility of 8435 Woodville Road (MIHP No. F-8-161). This property contains a significant late eighteenth century farmhouse and slave quarters. The property represents early settlement and the evolution of agricultural practices in Frederick County. The property retains sufficient integrity to convey its historic associations. 8435 Woodville Road is eligible for listing in the National Register of Historic Places.

Martin O'Malley, *Governor*
Anthony G. Brown, *Lt. Governor*

SHA State Highway Administration

John D. Porcari, *Secretary*
Neil J. Pedersen, *Administrator*

Maryland Department of Transportation

January 10, 2008

Re: Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Montgomery and Frederick Counties, Maryland
USGS *Rockville, Gaithersburg, Germantown, Urbana* and *Frederick* 7.5' Quadrangles

Mr. J. Rodney Little
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Mr. Little:

Introduction and Project Description

This letter serves to inform the Maryland Historical Trust (MHT) of the Maryland State Highway Administration's (SHA) and the Maryland Transit Administration's (MTA) finding that proposed project FR192B11, the I-270/ US 15 Multi-Modal Study, would have an adverse effect on historic properties. The project involves the addition of travel lanes along I-270 and US 15, and construction of a bus or rail transit system (the Corridor Cities Transitway, or CCT). Several combinations of highway and transit strategies are under study for the overall project, including general-purpose lanes, high occupancy vehicle (HOV) lanes, express toll lanes (ETL), auxiliary lanes, and collector-distributor (C-D) lanes; the transit component of the project includes Light Rail Transit (LRT), Bus Rapid Transit (BRT), or Premium Bus Service. The four alternatives are identified as Alternative 6A (ETL/LRT), 6B (ETL/BRT), 7A (ETL/LRT) and 7B (ETL/BRT).

On February 15 and March 14, 2002, SHA coordinated effects for Build Alternatives 3A, 3B, 4A, 4B, 5A, 5B and 5C, each of which consist of a highway and a transit component. The highway component varies from the addition of one (1) High Occupancy Vehicle (HOV) lane in each direction (Alternative 3); one (1) general-purpose lane (GPL) in each direction (Alternative 4); or an "Enhanced Alternative" adding one HOV and one GPL in each direction (Alternative 5). In general, the Enhanced Alternative has greater right-of-way needs and impacts. The transit component involves either LRT or BRT on the CCT alignment (Alternatives A or B, respectively) or Premium Bus Service on the highway (only Alternative 5C).

SHA coordinated the undertaking's Area of Potential Effects (APE) and cultural resource eligibility on September 5, 2001, and received MHT's concurrence with the APE and our eligibility determinations on November 26, 2001. SHA coordinated revisions to the APE and the effect of the undertaking on February 15 and March 14, 2002, and received MHT's response on April 29, 2002. MHT indicated that it was premature to comment on the revised APE or the draft Memorandum of Agreement at that time, but concurred with SHA's determination that the proposed undertaking would have an adverse effect on "numerous historic properties," including the Monocacy National Battlefield, a National Historic Landmark. However, MHT did not provide comments about impacts to individual historic properties, or on the recommended boundary reduction for one historic property.

SHA has subsequently developed Alternatives 6A, 6B, 7A and 7B, and has made minor design changes to the CCT and to previously coordinated Alternatives. The two new alternatives involve Express Toll Lanes (ETL), tolled highway lanes intended to provide new capacity sooner than possible through traditional funding sources. Alternative 6 would add two ETLs in Montgomery County and one ETL in Frederick County. Alternative 7 would add two ETLs in Montgomery County and two ETLs in Frederick County. In Frederick County the alternatives are limited to ETL lanes south of the Monocacy Battlefield. Through the Monocacy Battlefield to MD 85, the highway will be widened to four general purpose lanes in each direction. This is also the case for US 15 from I-70 to Biggs Ford Road. The plans indicate areas where SHA is considering stormwater management (SWM) facilities. However, at this time, no decision has been made regarding location or design. SHA will stipulate coordination of these and other ancillary activities through the project's Memorandum of Agreement (MOA), and continue consultation with all parties as the designs become available.

Since our previous correspondence on the project, we have coordinated with the National Park Service (NPS) and MHT through a series of meetings held in 2002 and 2003. Our most recent meeting occurred on November 8, 2007, in order to re-initiate contact with NPS staff. SHA's discussions with the NPS focused on impacts to the Monocacy National Battlefield, and on previously discussed methods to avoid, minimize, or mitigate those impacts. We will contact NPS and MHT to resume formal coordination meetings in the near future.

Project plans for both the individual highway and CCT components are included as **Attachment 1**.

Funding:

Federal funds are anticipated for this project.

Area of Potential Effects

In determining the Area of Potential Effects (APE) for this project, SHA considered possible physical, visual, atmospheric and/or audible impacts to historic properties, both archeological sites and standing structures, that would diminish any National Register of Historic Places (NRHP) qualifying characteristic or the historic property's integrity. The project involves widening of I-270 and US 15, which will require right-of-way, as well as permanent and temporary easements. For the transit portion, both the CCT's LRT and the BRT will require new right-of-way, and permanent and temporary easements. However, because of the character of the built environment in both Montgomery and Frederick counties, SHA has limited the APE to those identified standing historic properties that are within 250 feet of the proposed I-270, US 15, or the CCT right-of-way lines. In areas where the historic property's boundary extends beyond 250 feet, SHA has included the entire property, such as Monocacy National Battlefield survey area within the APE is defined as the limits of construction where ground disturbance would occur. Because SHA is not coordinating effects of ancillary projects outside the proposed right-of-way limits, there are no discontiguous portions of the APE. Alternatives 3A, 3B, 4A, 4B, 5A, 5B, 5C, 6A, 6B, 7A and 7B fall within the same footprint and the defined APE also applies to historic properties associated with the earlier identified alternatives. The APE is indicated on the attached SHA quadrangle maps for Rockville, Gaithersburg, Germantown, Urbana and Frederick **(Attachment 2)**.

Identification Methods and Results

Potentially significant architectural and archeological resources were both researched as part of the historic investigation instigated by the I-270/ US 15 Multi-Modal Study, SHA Project No. FR192B11.

Architecture: SHA Architectural Historian Anne E. Bruder consulted project files, including previous correspondence, the project's 2002 Draft Environmental Impact Statement (DEIS), the SHA-GIS quadrangle mapping; and attended project meetings. Ms. Bruder made field visits on June 6, August 4, August 8, August 9, August 27 and October 2, 2006 and again on October 1 and October 9, 2007 to assess the potential for historic standing structures and project impacts.

Historic properties in the APE exemplify important events in central Maryland such as colonial settlements, the Civil War, the railroad, agriculture, and suburban Federal government facilities in both counties. Historic properties include the Atomic Energy Commission Building, U.S. Department of Energy (M:19-41), England/Crown Farm (M:20-7), Belward Farm (M:20-21), Monocacy National Battlefield (F-3-42), Spring Bank (F-3-22), Rose Hill Manor (F-3-126), Schifferstadt (F-3-47), Birely-Roelkey Farm (F-3-134), Harmony Grove Union Church (F-3-197) and Worman House (F-3-198), which SHA and/or MTA and MHT have previously agreed are eligible for or listed in the National Register of Historic Places. The Monocacy Battlefield is also a National Historic Landmark.

As explained more fully in the attached Impact Assessment Technical Report (IATR), SHA has determined that there will be adverse impacts to each of these historic properties caused by Alternatives 3A/B, 4A/B, 5A/B/C, 6A/B and 7A/B, including the HOV/LRT, HOV/BRT, GPL/LRT, GPL/BRT, HOV/GPL/LRT, HOV/GPL/BRT, ETL/LRT or ETL/BRT. With the exception of Spring Bank, Harmony Grove Union Church and the Worman House, SHA and MTA will take right-of-way from each historic property. These physical impacts meet the requirements of 36 CFR §800.5 (physical destruction of the historic property) because they will alter the integrity of setting, design, workmanship, feeling and association. SHA has also performed a noise analysis on each property contained in the technical report titled *Multi-Modal Corridor Study, Frederick and Montgomery Counties, Maryland, Noise and Vibration Technical Report, August 2007* prepared by Parsons Brinkerhoff (PB 2007). SHA has determined that there will be audible impacts of at least 76 decibels (dBA) at Monocacy Battlefield, 68 dBA at Schifferstadt, 75 dBA at Rose Hill Manor and 69 dBA at Spring Bank that meet the adverse effect criteria found at 36 CFR §800.5. SHA's noise abatement policy requires corrective action at 67 dBA. SHA did not conduct noise testing at either the Harmony Grove Union Chapel or at the Worman House, although a nearby site closer than Spring Bank was tested. SHA has determined that there will be no adverse impacts to these two historic properties because US 15 will be widened at the rear of the Harmony Grove Union Chapel, and the railroad stands between the highway and the chapel, while other buildings and the railroad stand between the Worman House and US 15. As a result, the impacts are to the historic properties' viewshed, but are not adverse. SHA's Effects Table also details our effect determination. The IATR and the Effects Table will be found in **Attachments 3** and **5** respectively.

SHA has noted that Schifferstadt is a MHT Easement Property and we request that the MHT Easement Committee provide comments regarding the impact of the project to this historic property by Alternatives 6 and 7. SHA anticipates taking 0.9 acres from within the preservation easement boundary. A copy of the plan sheet showing the impacts to the historic property is included as part of **Attachment 1**.

In our February 2002 letter, SHA requested MHT's concurrence with the revised boundary for Belward Farm (M:20-21), as a result of construction by Johns Hopkins University which created the Johns Hopkins Belward Research Campus. SHA used an aerial photo to demonstrate the reasons for the property's reduced boundary. Attachment VII of SHA's February 15, 2002 letter is a line of sight rendering showing the construction of the first phase of the campus then underway. In the past five years, the construction has continued. As a result, the former 124 acre parcel is now reduced to 107 acres. SHA again requests MHT's concurrence with this boundary reduction. **Attachment 6** contains an addendum and mapping showing the revised boundary.

Based on the current state of SHA's plans and the current built environment in Montgomery and Frederick counties, SHA believes that the following historic properties are outside the APE as defined above: Browningsville Historic District (M:10-13), Hyattstown Historic District (M:10-59), Clarksburg Historic District (M:13-10), the Clarksburg School (M:13-52), Pleasant Fields (M:19-1), Billy King Farm (M:20-32), Summit Hall (M:21-3), Washington Grove Historic District (M:21-5), C. G. Statler House (M: 21-7), Observatory Heights Historic District (M:21-136), Brookes, Russell and Walker Historic District (M:21-165), Thomas Cannery (M:21-168), Chestnut/Meem Historic District (M:21-178), Casey Barn (M:21-183), Linden Grove (F-1-80), Motter-Simmons Farm (F-2-144), Frederick Historic District (F-3-39), Guilford (F-3-40), Hoke-Grove Limestone Property (F-3-145), Urbana Historic District (F-7-73), Stancioff House (F-7-3), Dr. Perry House (F-7-35), Francis Mantz House (F-7-59), and H. William Tabler House (F-7-130). Some of these historic properties may be impacted by ancillary activities associated with the I-270/US 15 improvements, and SHA will include a stipulation in the project's Memorandum of Agreement (MOA) to address these activities as they occur. However, for Alternatives 3A, 3B, 4A, 4B, 5A, 5B, 5C, 6A, 6B, 7A and 7B, these historic properties lie beyond the 250 feet APE boundary, and SHA has determined that there will be no impacts to any of these historic properties.

Under separate cover, SHA has also notified each property owner, the Advisory Council on Historic Preservation, and the Secretary of the Interior about the new alternatives, the new adverse effect determination and requested comments regarding SHA and MTA's project.

Archeology: SHA archeologist Richard Ervin assessed the archeological potential of the referenced project based on examination of previous archeological studies, soils maps, historic maps, topographic maps, and the SHA-GIS Cultural Resources Database. The re-assessment follows the previous June 1, 2001 assessment by SHA archeologist Mary Barse. Field visits were made to the project area on July 20 and July 26, 2007.

The project crosses the Eastern and Western Piedmont Physiographic Provinces. Topography ranges from moderately to steeply rolling terrain with incised stream valleys in the south and east, to the broad, level terraces of the Monocacy River floodplain to the north and west. A total of 87 sites have been recorded on the USGS Germantown and Urbana quadrangles. This data shows that sites occur both on well-drained terrain near surface water, as expected, and on steep, rocky soils.

Kavanagh (1981) studied the I-270 corridor from the Spur north to MD 121 and recorded thirteen sites, all outside the present APE or destroyed prior to 2000. A number of other sites have been recorded in or near the APE, and numerous surveys of smaller areas near the APE have been conducted by various investigators. Fiedel's (2000) investigation of Alternatives 3, 4, and 5 considered the I-270 and US 15 mainlines, the CCT, new interchanges, improvements to existing interchanges, and park and ride locations. Fiedel's survey recorded eight archeological sites and examined six recorded sites. None of the investigated sites was considered eligible for listing on the NRHP, and MHT concurred with these determinations on November 26, 2001.

Alternative 6 differs from previously coordinated Alternative 3 primarily by the proposed use of ETL rather than HOV lanes, but proposed impacts are comparable. Enhanced Master Plan Alternative 7 (proposing the addition of two lanes where one is called for by the Montgomery County Master Plan) is comparable to previously coordinated Alternative 5. Therefore, impacts from Alternative 6 and 7 are generally similar to Alternatives 3 and 5 examined by Fiedel (2000). Minor design changes have been made over the last seven years, including a reconfigured ramp at the proposed New Cut Road interchange; a new Park & Ride lot at the Biggs Ford Road interchange; and a relocated stormwater management pond at the Monocacy Road interchange. Numerous additional stormwater management pond locations will be determined for the project in the future.

No further archeological investigations are recommended for Alternatives 6 and 7 at this time, because the APE was previously examined by Fiedel (2000). Additional archeological work will likely be required in the future as design details are developed. Current plans still lack specific design details, and identification of project elements such as stormwater management ponds has not yet been completed. SHA's September 5, 2001 letter noted the need for additional work at several locations that would be impacted by project design changes, and on November 26, 2001 MHT concurred with SHA's recommendation to defer that work. Archeological investigations are now underway at several of the referenced locations that will be impacted by breakout projects at interchanges, or by wetland mitigation work. Aside from break-out projects at these or other locations, SHA continues to recommend that additional archeological identification be conducted after design changes are resolved and the number of alternatives is reduced. At that time, SHA plans to resume negotiations with MHT and the NPS to begin to develop a Memorandum of Agreement stipulating that SHA shall undertake additional archeological identification of high potential areas not covered by our previous survey, together with evaluation and mitigation work, as warranted.

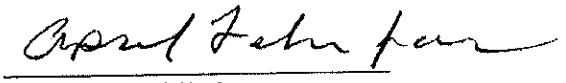
Attachment 4 provides the results of the archeological assessment indicating the areas that will require supplemental archeological identification studies for current design impacts. A number of these areas are identified in SHA's September 5, 2001 letter to MHT, while other locations reflect more recent design modifications. Additional work will also likely be needed for stormwater management pond locations that have not yet been identified.

Review Request

Please examine the attached maps, plans, and Effects Table. We request your concurrence by **February 4, 2008** that there would be adverse effects on historic properties by FR192B11, the I-270/ US 15 Multi-Modal Study. We also request your concurrence that the APE as defined by SHA is appropriate and that the identified historic properties are beyond the APE boundary. By carbon copy, we invite the Frederick County Historic Preservation Commission, Frederick City Historic District commission, Montgomery Preservation, Inc., the Montgomery County Historic Preservation Commission, U.S. Department of Energy, General Services Administration, Monocacy Battlefield, Schifferstadt Architectural Museum, and Rose Hill Manor Park, to provide comments and participate in the Section 106 process. Pursuant to the requirements of the implementing regulations in 36 CFR Part 800, SHA seeks their assistance in identifying historic preservation issues related to this project (see 36 CFR §§800.2(c)(4) and (6), and 800.3(f) for information on consulting parties, and §§800.4 and 800.5 for identification of historic properties and assessment of effects). For additional information regarding the Section 106 regulations, see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact the Maryland State Highway Administration or the Maryland Historical Trust. If no response is received by **February 4, 2008**, we will assume that these offices decline to participate. Please call Ms. Anne E. Bruder at 410-545-8559 (or via email at abruder@sha.state.md.us) with questions regarding standing structures for this project. Mr. Richard Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archeology.

Very truly yours,

Bruce M. Grey
Deputy Director
Office of Planning and
Preliminary Engineering

by: 

Julie S. Schablitsky
Cultural Resources Team Leader
Project Planning Division

Attachments:
1) Project Plans
2) Area of Potential Effects Map
3) Impact Assessment Technical Report
4) Areas Requiring Supplemental Archeological Survey
5) Effects Table
6) Belward Farm Addendum and Mapping

cc: Ms. Anne E. Bruder, SHA-PPD (w/Attachments 1-5)
Ms. Janet Davis, Frederick County Historic Preservation Commission (w/Attachments)
Ms. Anne Elrays, SHA-PPD
Mr. Richard Ervin, SHA-PPD
Mr. Wayne Goldstein, Montgomery Preservation, Inc. (w/Attachments)
Dr. F.G. Gosling, U.S. Department of Energy (w/Attachments)
Ms. Joann Ivancic, Schifferstadt Architectural Museum (w/Attachments)
Mr. Daniel Johnson, FHWA
Edward Bernard Justis, Esq., Associate General Counsel, Johns Hopkins University (w/Attachments)
The Hon. Dirk Kempthorne, Secretary, Department of Interior (w/Attachments)
Mr. Rick J. Kiegel, P.E., MTA (w/Attachments)
Mr. Don Klima/Ms. Carol Legard, ACHP (w/Attachments)
Mr. Joseph Kresslein, SHA-OPPE
Mr. Greg May, Crown Village Farm, LLC (w/Attachments)
Mr. David M. McDonough, Senior Director, Development Oversight, Johns Hopkins University (w/Attachments)
Mr. Rolando Rivas-Camp, FAIA, General Services Administration (w/Attachments)
Ms. Jennifer Roth, Rose Hill Manor Park (w/Attachments)
Dr. Julie Schablitsky, SHA-PPD
Ms. Elizabeth Schminke, MHT (w/Attachments)
Ms. Susan Trail, National Park Service – Monocacy Battlefield (w/Attachments)
Mr. Russell Walto, SHA-PPD (w/Attachments)
Mr. Michael Watkins, U.S. Department of Energy (w/Attachments)
Mr. Scott Whipple, Montgomery County Historic Pres Commission (w/Attachments)

Concurrence with the MD State Highway Administration's Determination(s) of Eligibility and/or Effects

Project Number: FR192B11 **MHT Log No._____**
Project Name: I-270/ US 15 Multi-Modal Study
County: Montgomery and Frederick Counties
Letter Date: January 4, 2008

The Maryland Historical Trust has reviewed the documentation attached to the referenced letter and concurs with the MD State Highway Administration's determinations as follows:

Eligibility (as noted in the Eligibility Table [NA]):

[ ] Concur
[ ] Do Not Concur

Effect (as noted in the Effects Table [Attachment 5]):

[ ] No Properties Affected
[ ] No Adverse Effect
[ ] Conditioned upon the following action(s) (see comments below)
[ ] Adverse Effect

Agreement with FHWA's Section 4(f) criteria of temporary use (as detailed in the referenced letter, if applicable):

[ ] Agree

Agreement with FHWA's de minimus impact finding (as detailed in the referenced letter, if applicable):

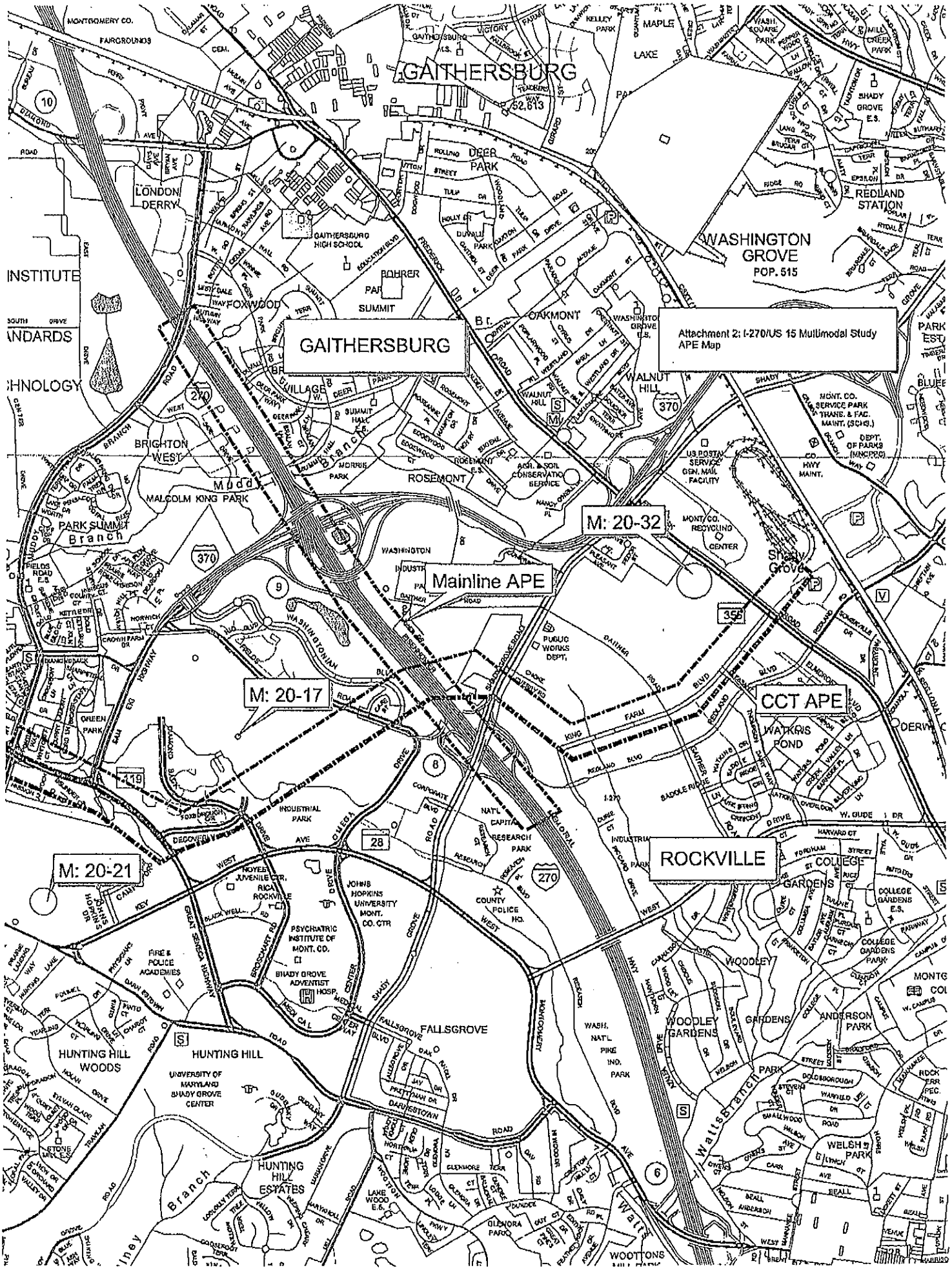
[ ] Agree

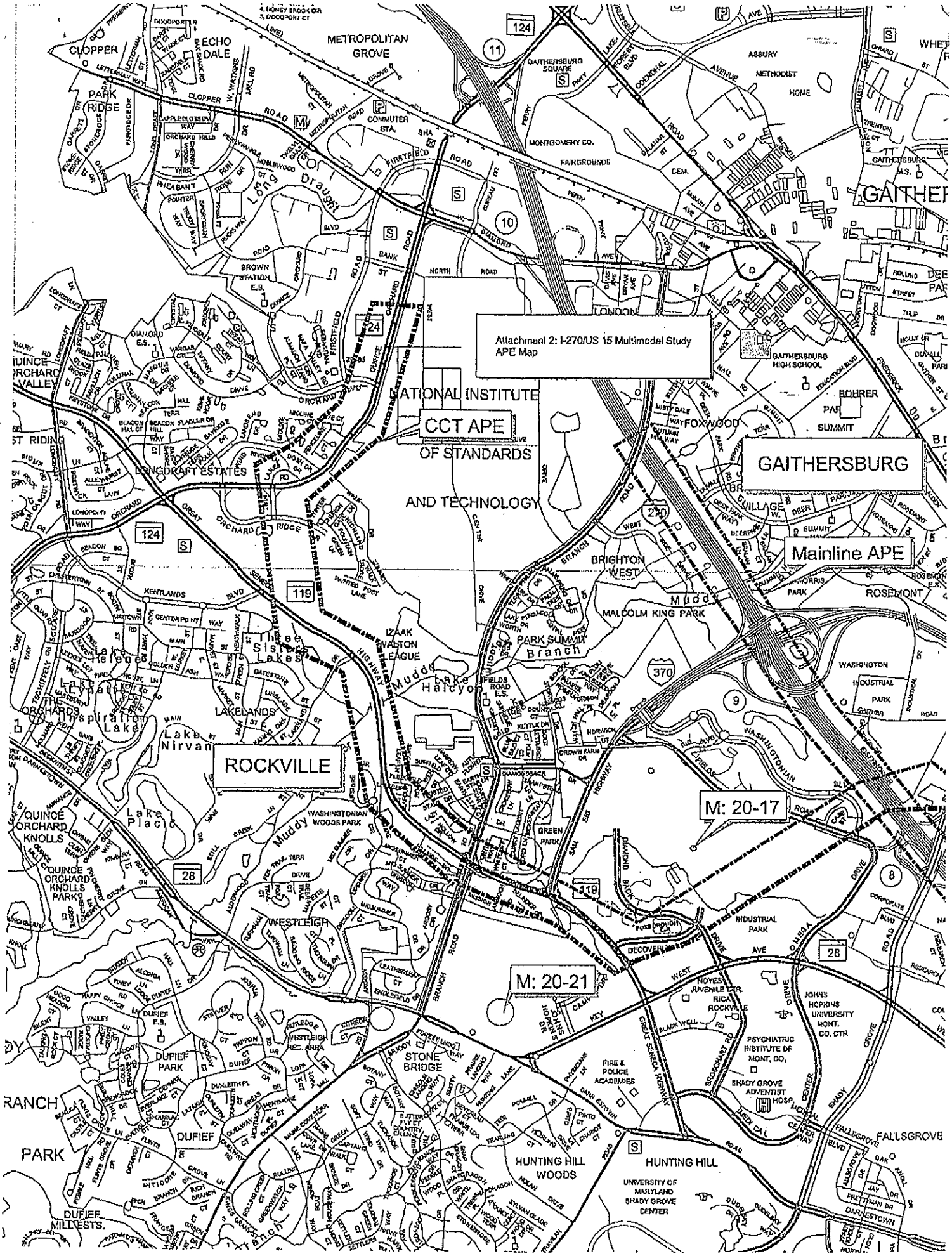
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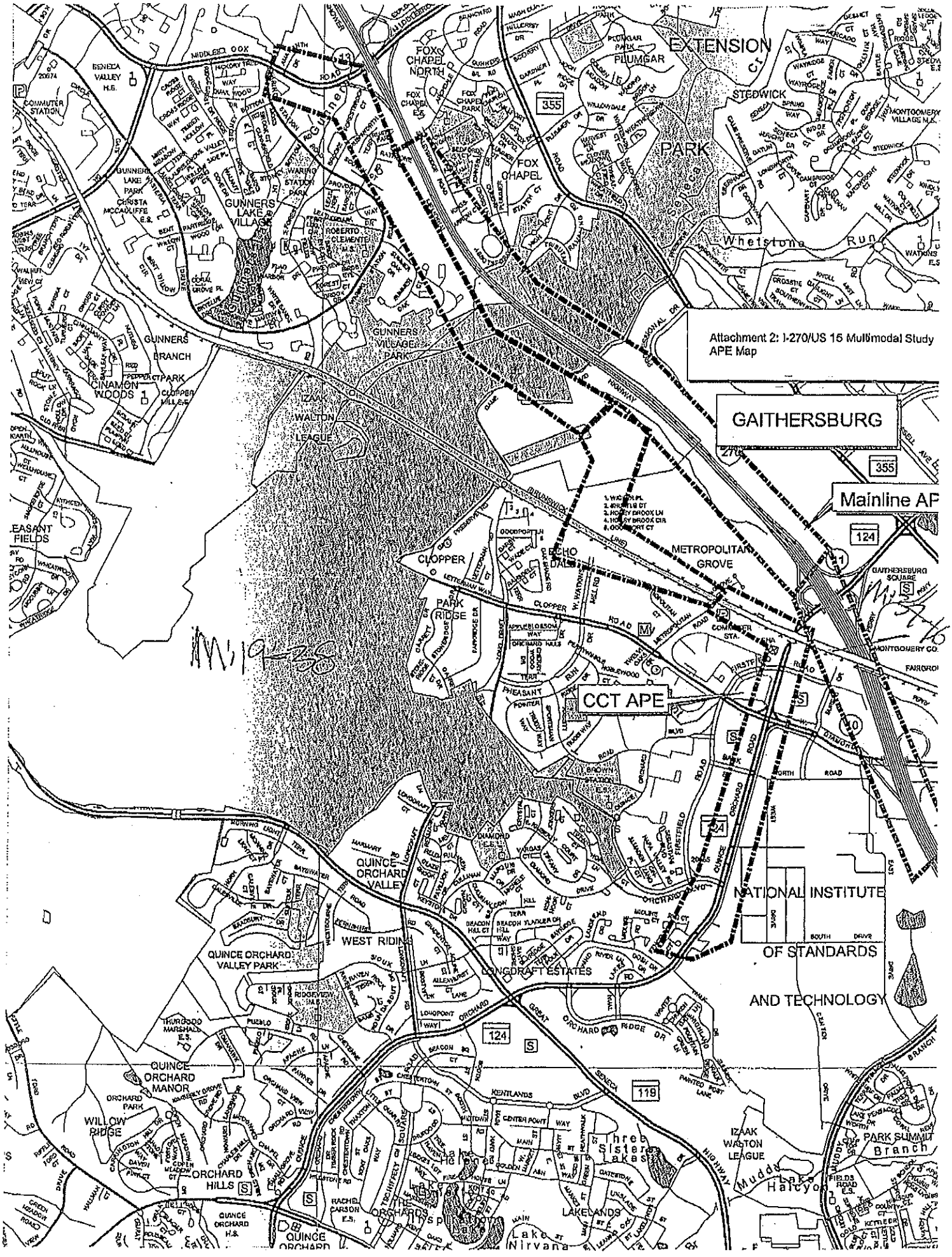
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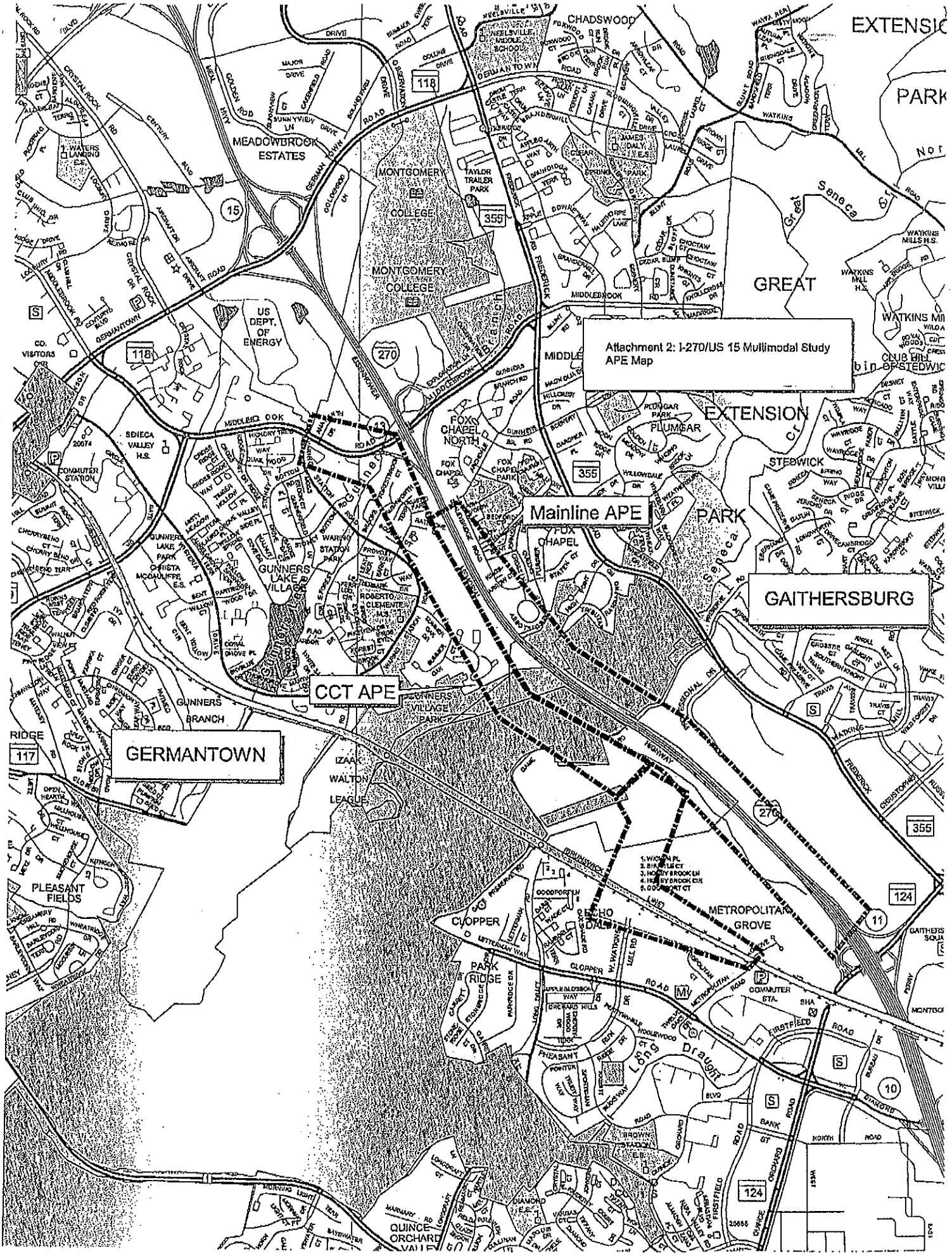
By: _____ _____
MD State Historic Preservation Office/ Date
Maryland Historical Trust

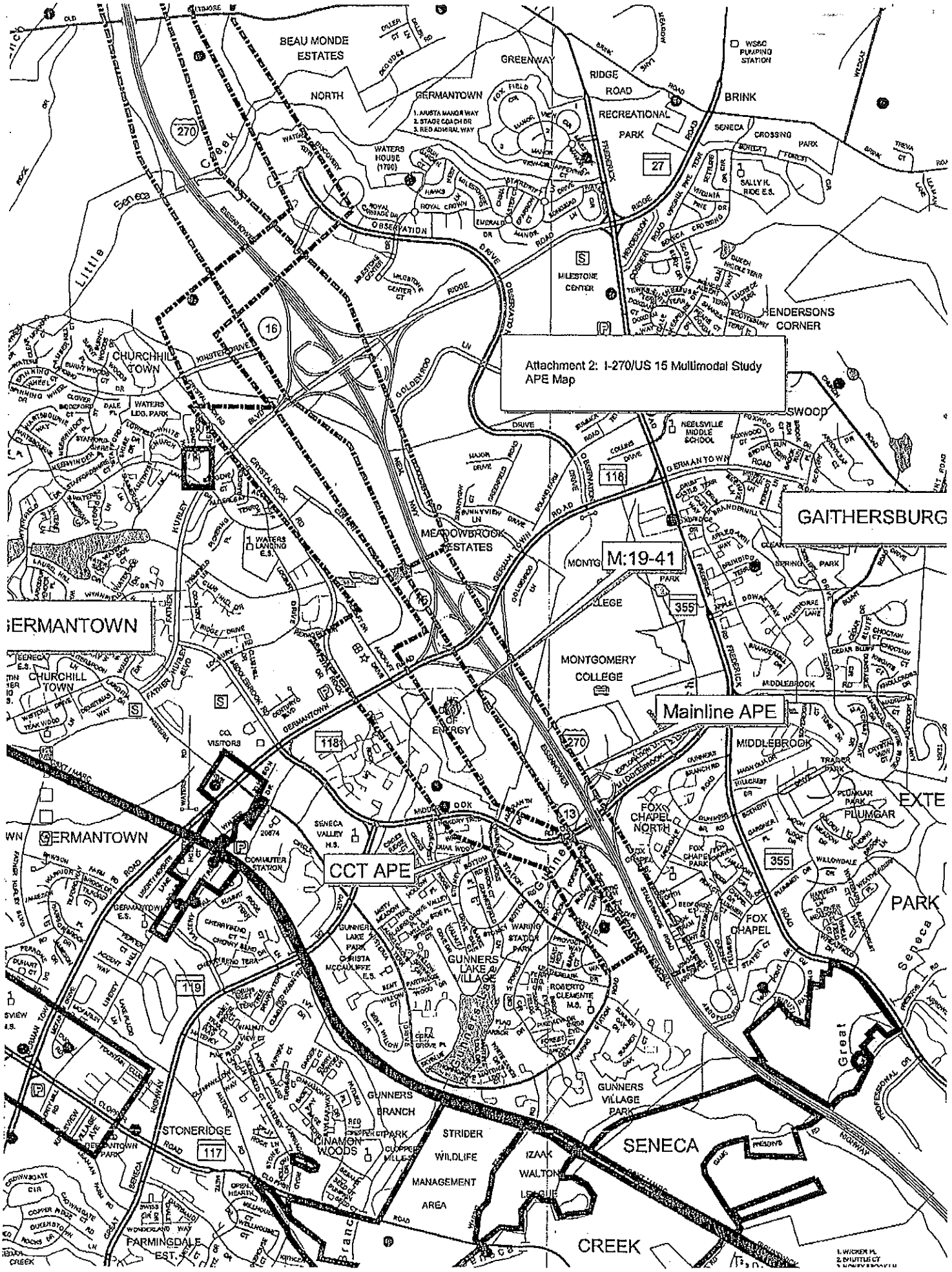
Return by U.S. Mail or Facsimile to:
Dr. Julie M. Schablitsky, Cultural Resources Team Leader, Project Planning Division,
MD State Highway Administration, P.O. Box 717, Baltimore, MD 21203-0717
Telephone: 410-545-8870 and Facsimile: 410-209-5004

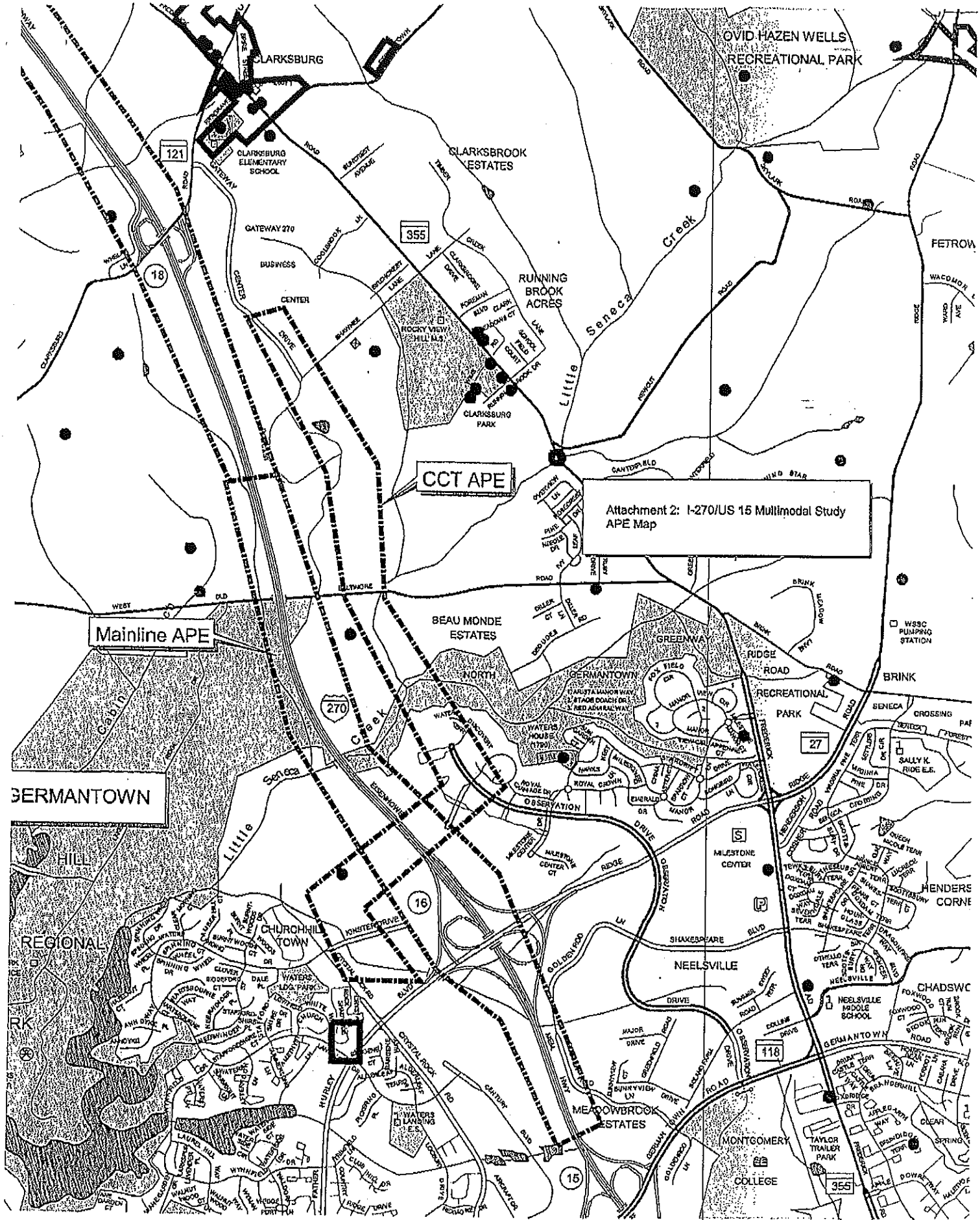

Attachment 2: I-270/US 15 Multimodal Study
APE Map
GAITHERSBURG
ROCKVILLE
WASHINGTON GROVE
POP. 515
Mainline APE
CCT APE
M: 20-17
M: 20-21
M: 20-32
GAITHERSBURG
ROCKVILLE
WASHINGTON GROVE
LONDON DERRY
INSTITUTE
BRIGHTON WEST
MALCOLM KING PARK
PARK SUMMIT
ROSEMONT
OAKMONT
WALNUT HILL
REDLAND STATION
SHADY GROVE
WATKINS POND
HUNTING HILL
HUNTING HILL WOODS
FALLSGROVE
WOODLEY GARDENS
COLLEGE GARDENS
ANDERSON PARK
WELSH PARK
HUNTING HILL ESTATES
WOOTTONS
PSYCHIATRIC INSTITUTE OF MONT. CO.
JOHNS HOPKINS UNIVERSITY MONT. CO. CTR
FIRE & POLICE ACADEMIES
UNIVERSITY OF MARYLAND SHADY GROVE CENTER
COUNTY POLICE HQ.
NAT'L CAPITAL RESEARCH PARK
WASH. NAT'L PIKE IND. PARK
INDUSTRIAL PARK
PUBLIC WORKS DEPT.
MONT. CO. RECYCLING CENTER
US POSTAL SERVICE GEN. MAIL FACILITY
MONT. CO. SERVICE PARK
DEPT. OF PARKS (MNCPPC)
ACR. & SOIL CONSERVATION SERVICE
GAITHERSBURG HIGH SCHOOL
ROBERER PARK SUMMIT
MORRIS PARK
DEER PARK
KELLEY PARK
MAPLE LAKE
WASH. SQUARE PARK
SHADY GROVE E.S.
WOODLEY GARDENS
COLLEGE GARDENS E.S.
LAKE WOOD E.S.
STONE MILL E.S.
MONTGOMERY CO. FAIRGROUNDS
GAITHERSBURG TEACHERS WAY
VICTORY TERR.
52,613
I-270
355
370
119
28
10
9
8
6

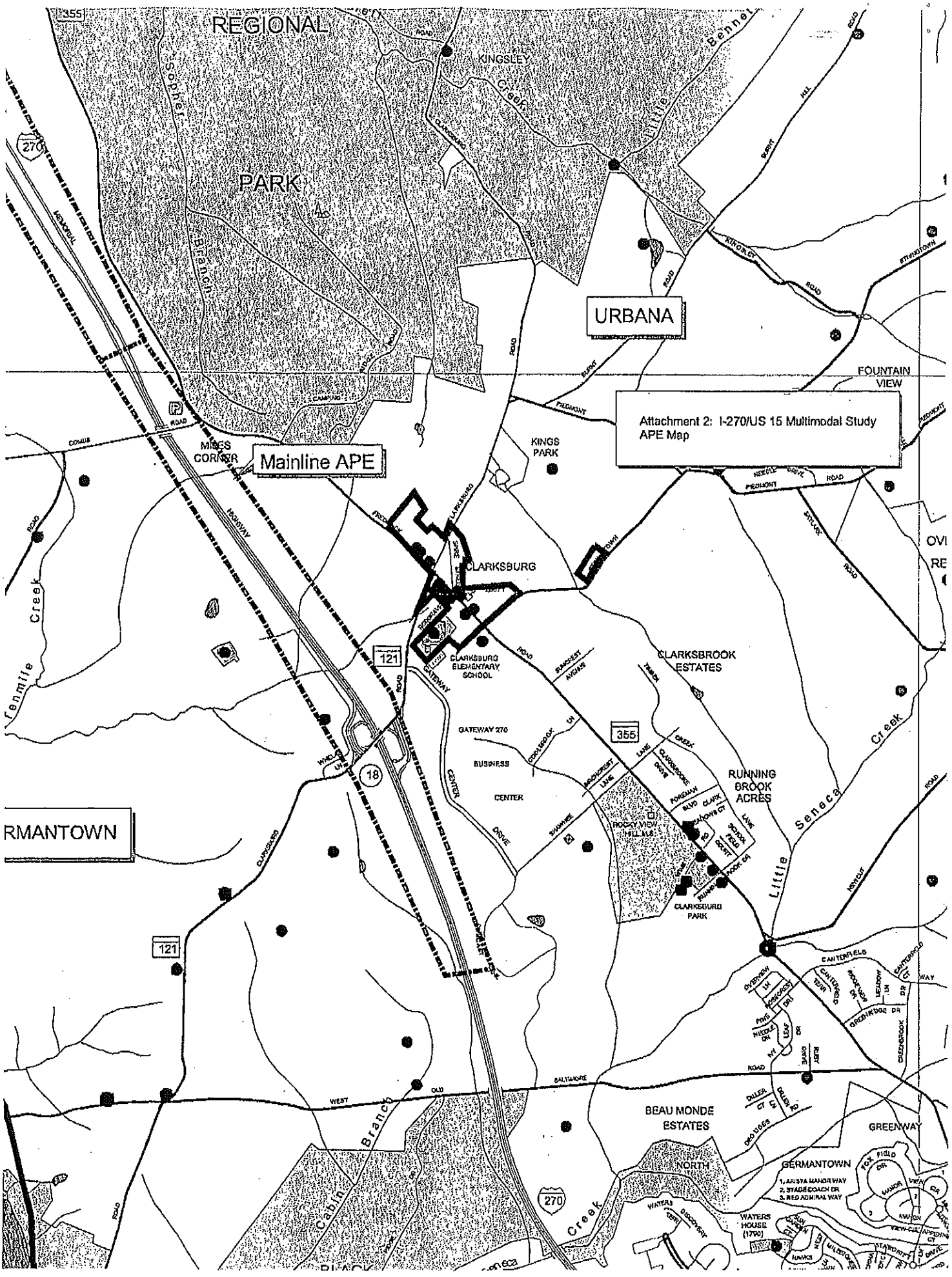

Attachment 2: I-270/US 15 Multimodal Study
APE Map
CCT APE
OF STANDARDS
AND TECHNOLOGY
Mainline APE
ROCKVILLE
GAITHERSBURG
M: 20-17
M: 20-21
METROPOLITAN GROVE
ECHO DALE
CLOPPER
PARK RIDGE
LONGDRAFT ESTATES
DIAMOND E.S.
BROWN STATION E.S.
GAITHERSBURG SQUARE
MONTGOMERY CO. FAIRGROUNDS
GAITHERSBURG HIGH SCHOOL
FOXWOOD
SUMMIT
VILLAGE
BRIGHTON WEST
ROSEMONT
MALCOLM KING PARK
IZAAK WALTON LEAGUE
FIELDS ROAD E.S.
WASHINGTONIAN WOODS PARK
WESTLEIGH
DUFIEF E.S.
DUFIEF PARK
DUFIEF MILLSTS.
STONE BRIDGE
HUNTING HILL WOODS
HUNTING HILL
FIRE & POLICE ACADEMIES
PSYCHIATRIC INSTITUTE OF MONT. CO.
SHADY GROVE ADVENTIST HOSP.
UNIVERSITY OF MARYLAND SHADY GROVE CENTER
FALLSGROVE
INDUSTRIAL PARK
WASHINGTONIAN INDUSTRIAL PARK
Muddy Branch
Lake Nirvana
Lake Placid
Lake Hallowell
Lake Halcyon
Lake Inspiration
Three Sisters Lakes
QUINCE ORCHARD KNOLLS
QUINCE ORCHARD KNOLLS PARK
QUINCE ORCHARD VALLEY
RANCH PARK

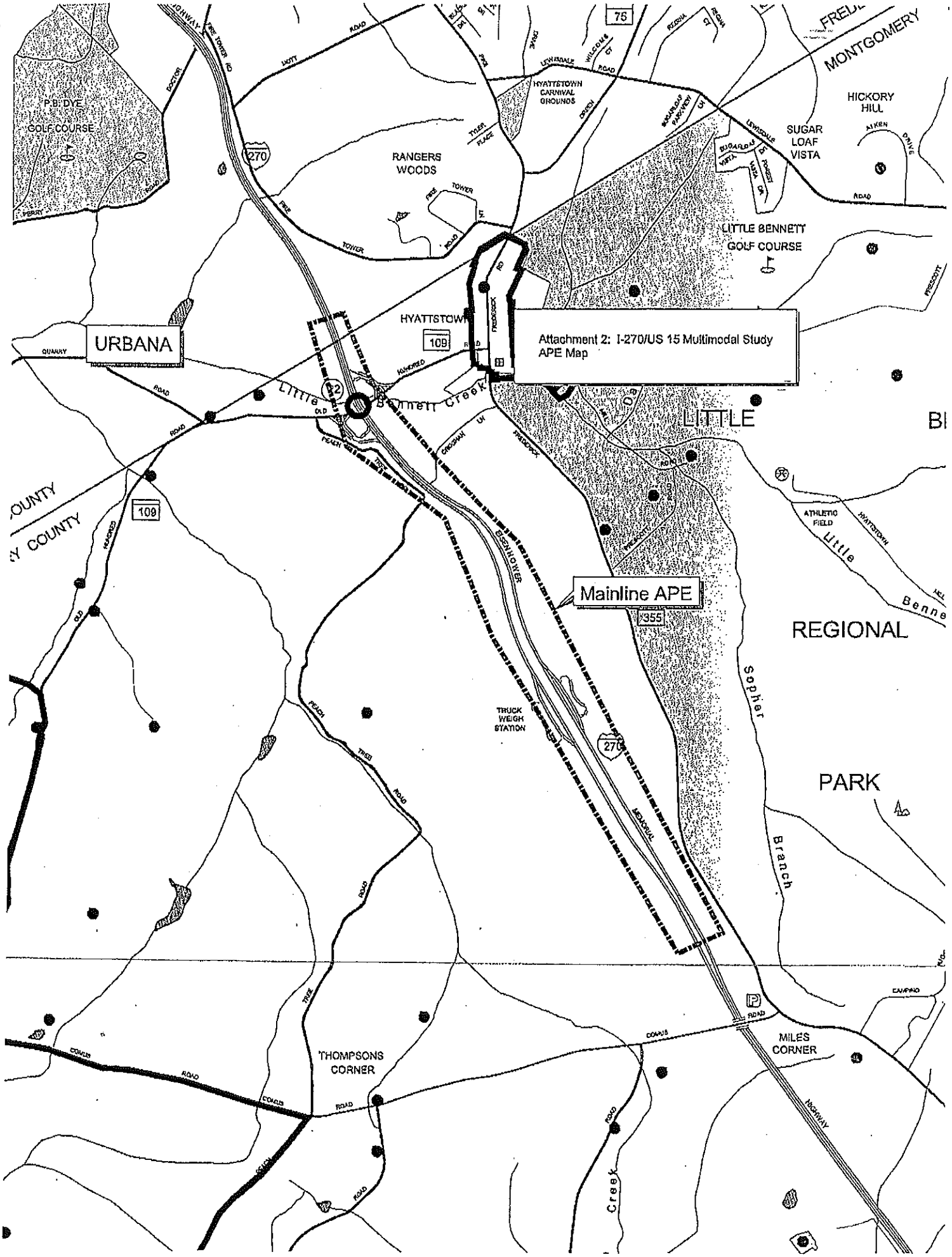

Attachment 2: I-270/US 15 Multimodal Study
APE Map
GAITHERSBURG
Mainline AP
CCT APE
EXTENSION
PARK
Whetstone Run
GUNNERS LAKE VILLAGE
GUNNERS VILLAGE PARK
GUNNERS BRANCH PARK
CINNAMON WOODS
WALTON LEAGUE
METROPOLITAN GROVE
CLOPPER ROAD
PARK RIDGE
QUINCE ORCHARD VALLEY
QUINCE ORCHARD VALLEY PARK
WEST RIDING
LONGDRAFT ESTATES
NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY
QUINCE ORCHARD MANOR
WILLOW RIDGE
ORCHARD HILLS
THE ORCHARDS
LAKELANDS
IZAAK WALTON LEAGUE
Three Sisters Lakes
Mudd Lake
Halcyon
Lake Nirvana
FOX CHAPEL
FOX CHAPEL NORTH
PLUMGAR PARK
STEDWICK
MONTGOMERY VILLAGE M.S.
BEECHVIEW ES
ROBERTO CLEMENTE M.S.
CRISTA MCCAULIFFE E.S.
CLOPPER MILL E.S.
PHEASANT FIELDS
ECHO DALE
GAITHERSBURG SQUARE
MONTGOMERY CO. FAIRGRO
BROWN STATION E.S.
DIAMOND E.S.
THURGOOD MARSHALL E.S.
RACHEL CARSON E.S.
WATKINS E.S.
FIELDS ROAD E.S.
PARK SUMMIT Branch
355
124
119
S
M
P

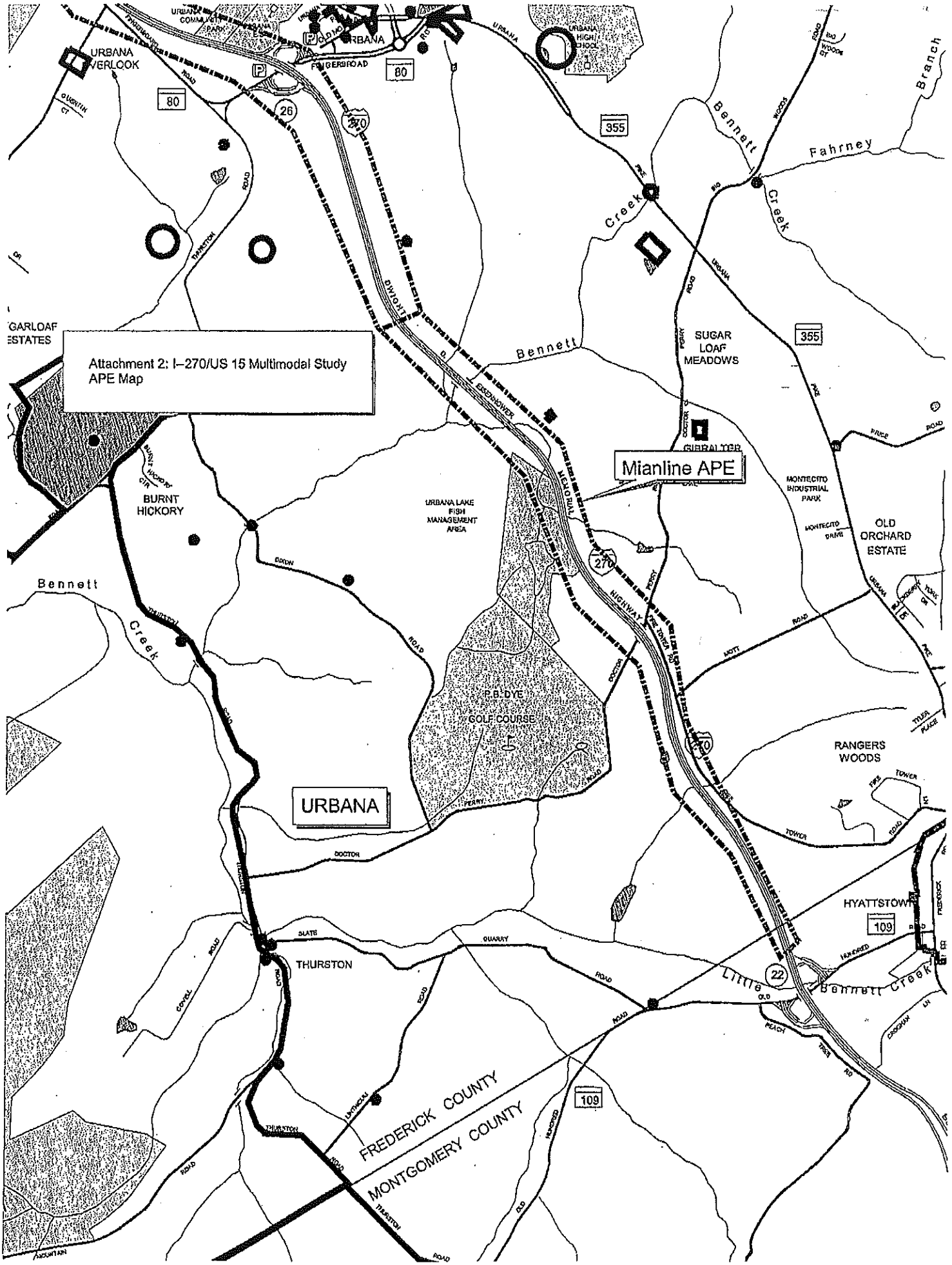

Attachment 2: I-270/US 15 Multimodal Study
APE Map
Mainline APE
CCT APE
GERMANTOWN
GAITHERSBURG
GREAT
EXTENSION
PARK
MONTGOMERY COLLEGE
MEADOWBROOK ESTATES
US DEPT. OF ENERGY
GUNNERS LAKE VILLAGE
FOX CHAPEL
PLUMGAR PARK
STEDWICK
METROPOLITAN GROVE
PARK RIDGE
PLEASANT FIELDS
CLOPPER
QUINCE ORCHARD VALLEY
SENECA VALLEY H.S.
MONTGOMERY BLAIR H.S.
WATKINS MILL H.S.
CHADSWOOD
CLUB HILL
GUNNERS BRANCH
IZAAK WALTON LEAGUE
Great Seneca Cr
Long Draught
Seneca
Clopper
Frederick
Germantown
Middlebrook
Watkins Mill
Fox Chapel
Gunners Lake
Stedwick
Plumgar
Metropolitan Grove
Park Ridge
Pleasant Fields
Quince Orchard Valley
Gunners Branch
Izaak Walton League
Montgomery College
Meadowbrook Estates
Chadswood
Extension
Great Seneca Cr
Long Draught
Seneca
Clopper
Frederick
Germantown
Middlebrook
Watkins Mill
Fox Chapel
Gunners Lake
Stedwick
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Montgomery College
Meadowbrook Estates
Chadswood
Extension

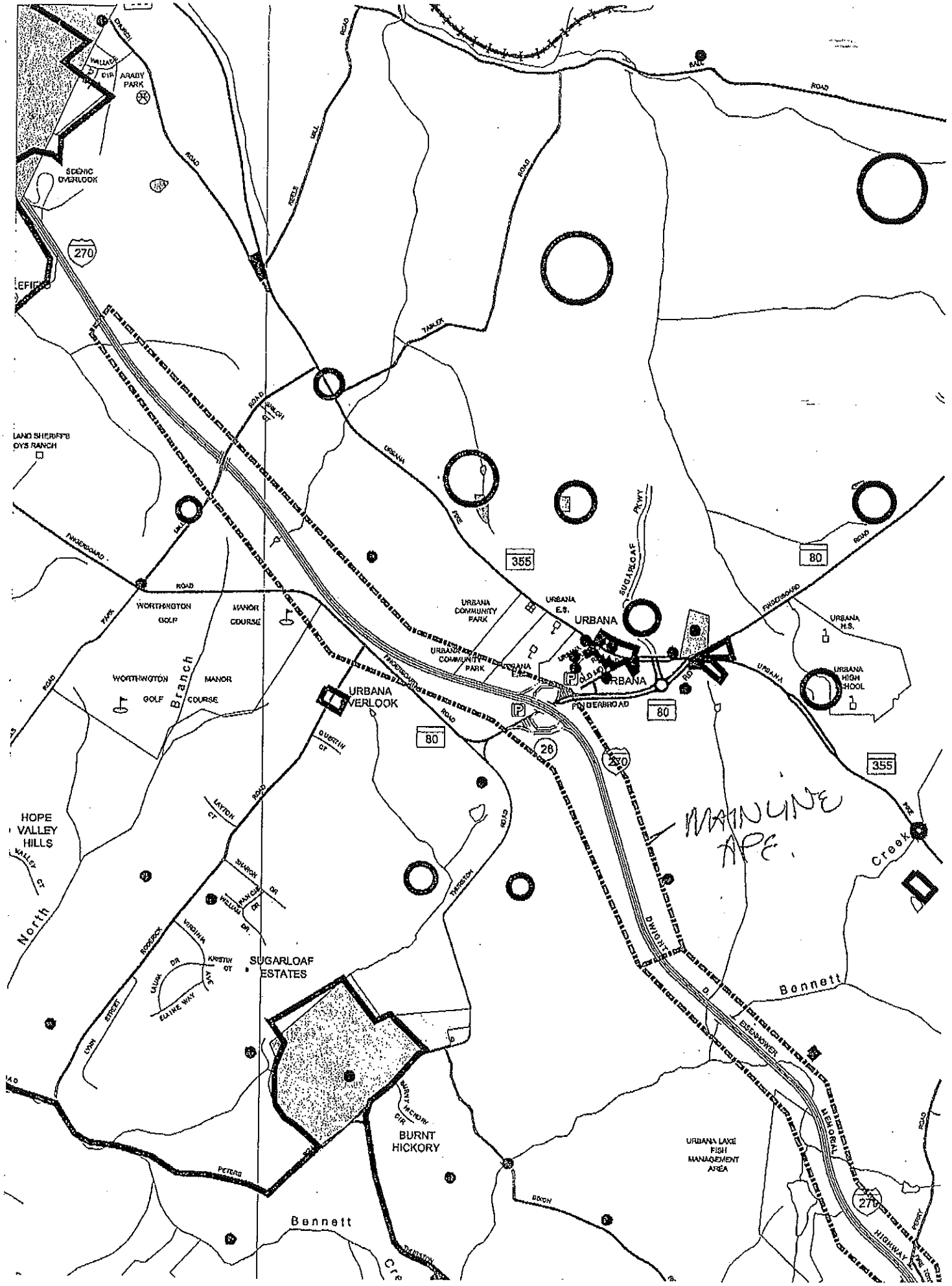

Attachment 2: I-270/US 15 Multimodal Study
APE Map
M:19-41
Mainline APE
CCT APE
BEAU MONDE ESTATES
NORTH
GREENWAY
GERMANTOWN
RIDGE ROAD
RECREATIONAL PARK
BRINK
SENECA CROSSING PARK
SALLY K. RIDE E.S.
WATERS HOUSE (1700)
MILESTONE CENTER
HENDERSONS CORNER
CHURCHILL TOWN
WATERS LDG. PARK
WATERS LANDING E.S.
NEELSVILLE MIDDLE SCHOOL
GAITHERSBURG
MEADOWBROOK ESTATES
MONTGOMERY COLLEGE
MIDDLEBROOK
FOX CHAPEL NORTH
FOX CHAPEL
PLUMGAR PARK
GERMANTOWN
SENECA VALLEY H.S.
COMMUTER STATION
GERMANTOWN E.S.
CHRISTA MCAULIFFE E.S.
GUNNERS LAKE PARK
GUNNERS LAKE VILLAGE
ROBERTO CLEMENTE M.S.
GUNNERS VILLAGE PARK
GUNNERS BRANCH
CINNAMON WOODS
STONERIDGE
STRIDER WILDLIFE MANAGEMENT AREA
IZAAK WALTON LEAGUE
SENECA
CREEK
FARMINGDALE EST.
Little Seneca Creek
Great Seneca Creek
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119
117
16
27
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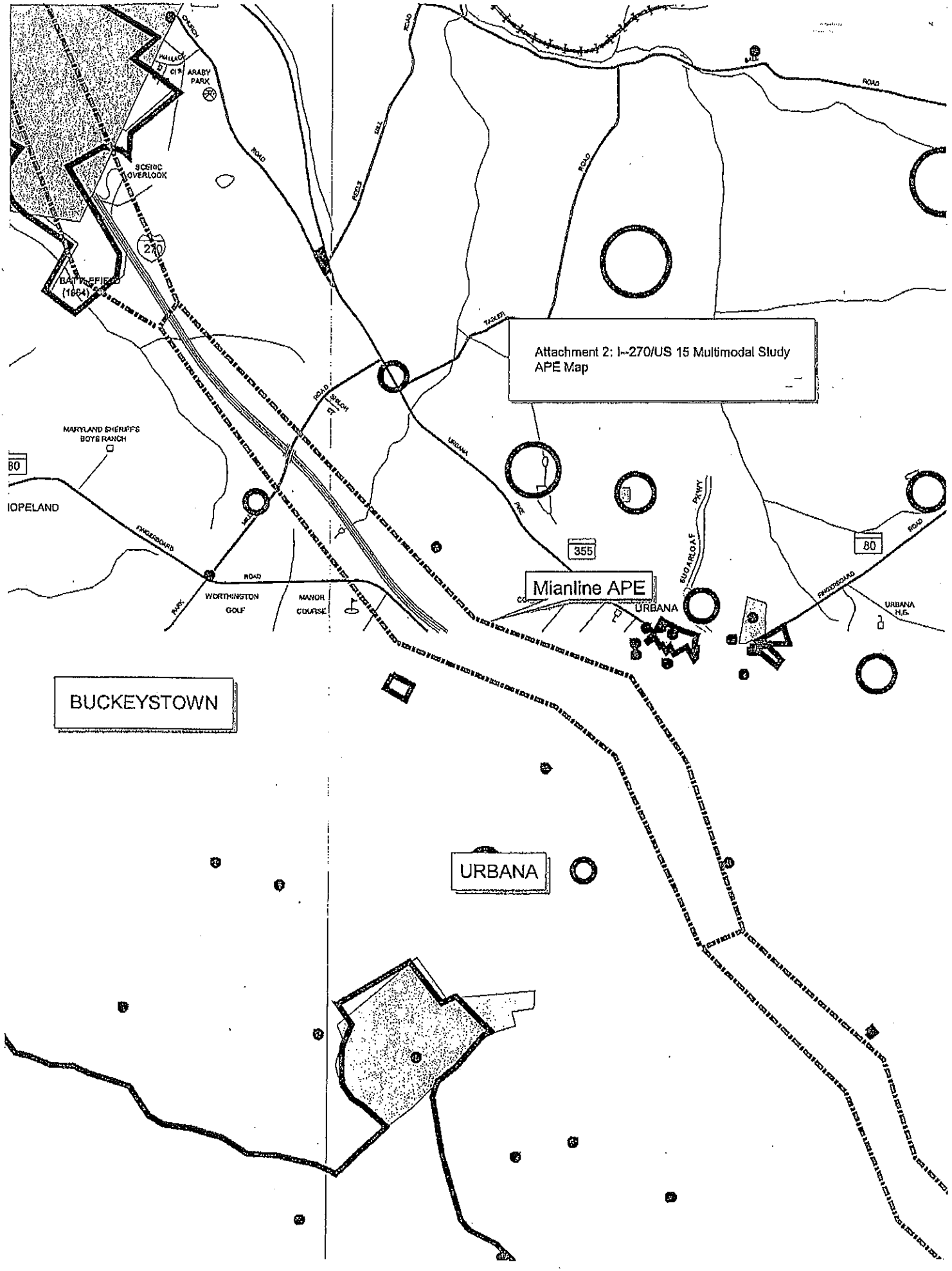

CLARKSBURG
OVID HAZEN WELLS RECREATIONAL PARK
CLARKSBURG ELEMENTARY SCHOOL
CLARKSBROOK ESTATES
GATEWAY 270 BUSINESS CENTER
RUNNING BROOK ACRES
ROCKY VIEW HILL M.S.
CLARKSBURG PARK
Little Seneca Creek
CCT APE
Attachment 2: I-270/US 15 Multimodal Study APE Map
Mainline APE
BEAU MONDE ESTATES
GERMANTOWN
NORTH GERMANTOWN
GREENWAY
RIDGE ROAD RECREATIONAL PARK
BRINK
WSSC PUMPING STATION
SENECA CROSSING
SALLY K. RIDE E.S.
WATERS HOUSE (1790)
OBSERVATION DRIVE
MILESTONE CENTER
CHURCHILL TOWN
REGIONAL
NEELSVILLE
NEELSVILLE MIDDLE SCHOOL
CHADSWORTH
WATERS LANDING E.S.
MEADOWBROOK ESTATES
MONTGOMERY COLLEGE
TAYLOR TRAILER PARK
121
355
18
270
16
15
27
118

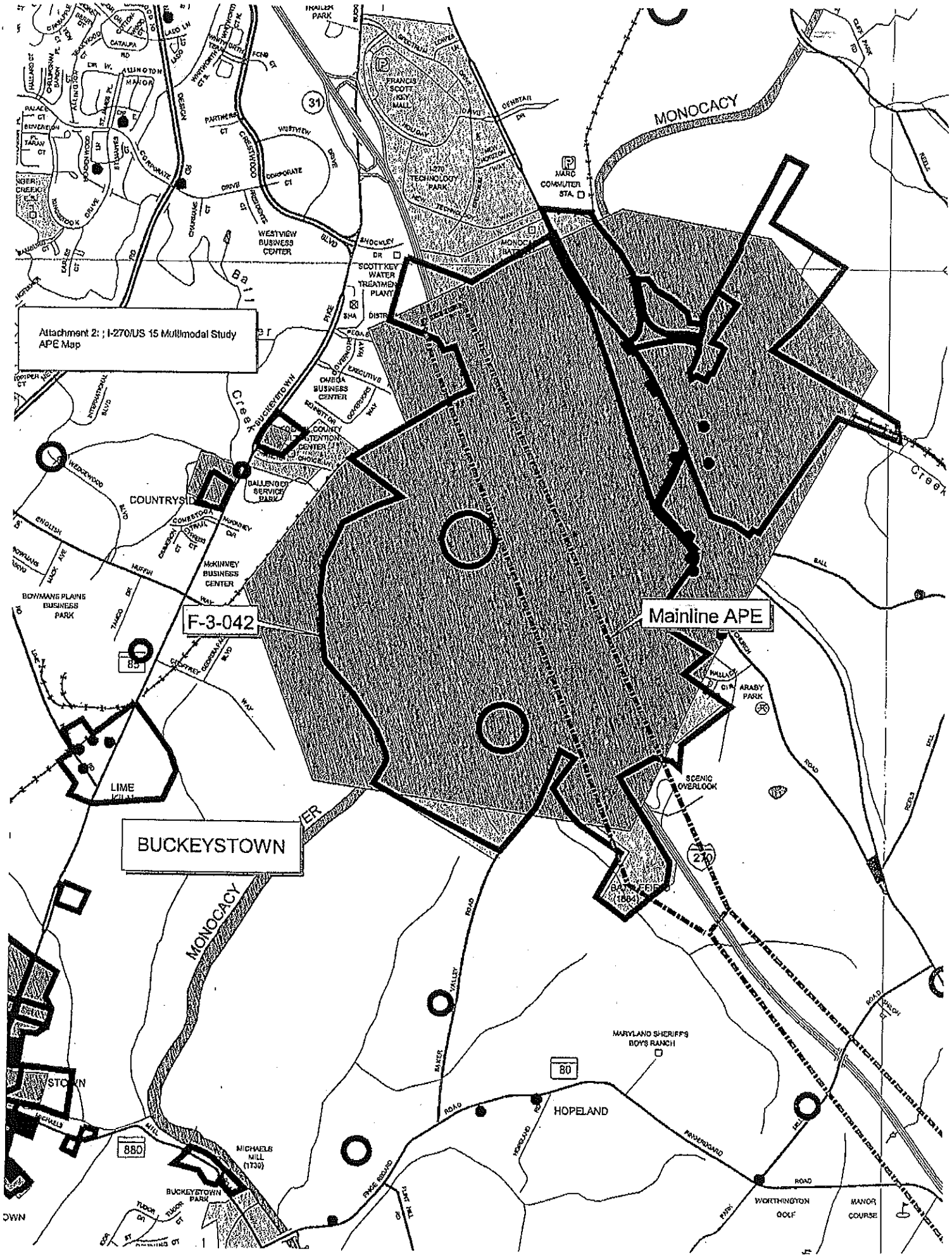

REGIONAL
PARK
KINGSLEY
URBANA
FOUNTAIN VIEW
Attachment 2: I-270/US 15 Multimodal Study
APE Map
Mainline APE
MILES CORNER
KINGS PARK
CLARKSBURG
CLARKSBURG ELEMENTARY SCHOOL
CLARKSBROOK ESTATES
GATEWAY 270 BUSINESS CENTER
RUNNING BROOK ACRES
CLARKSBURG PARK
RMANTOWN
BEAU MONDE ESTATES
GREENWAY
GERMANTOWN
WATERS HOUSE (1790)
Little Seneca Creek
Cabin Branch
Fenmile Creek
Bennett Creek
355
121
270
18

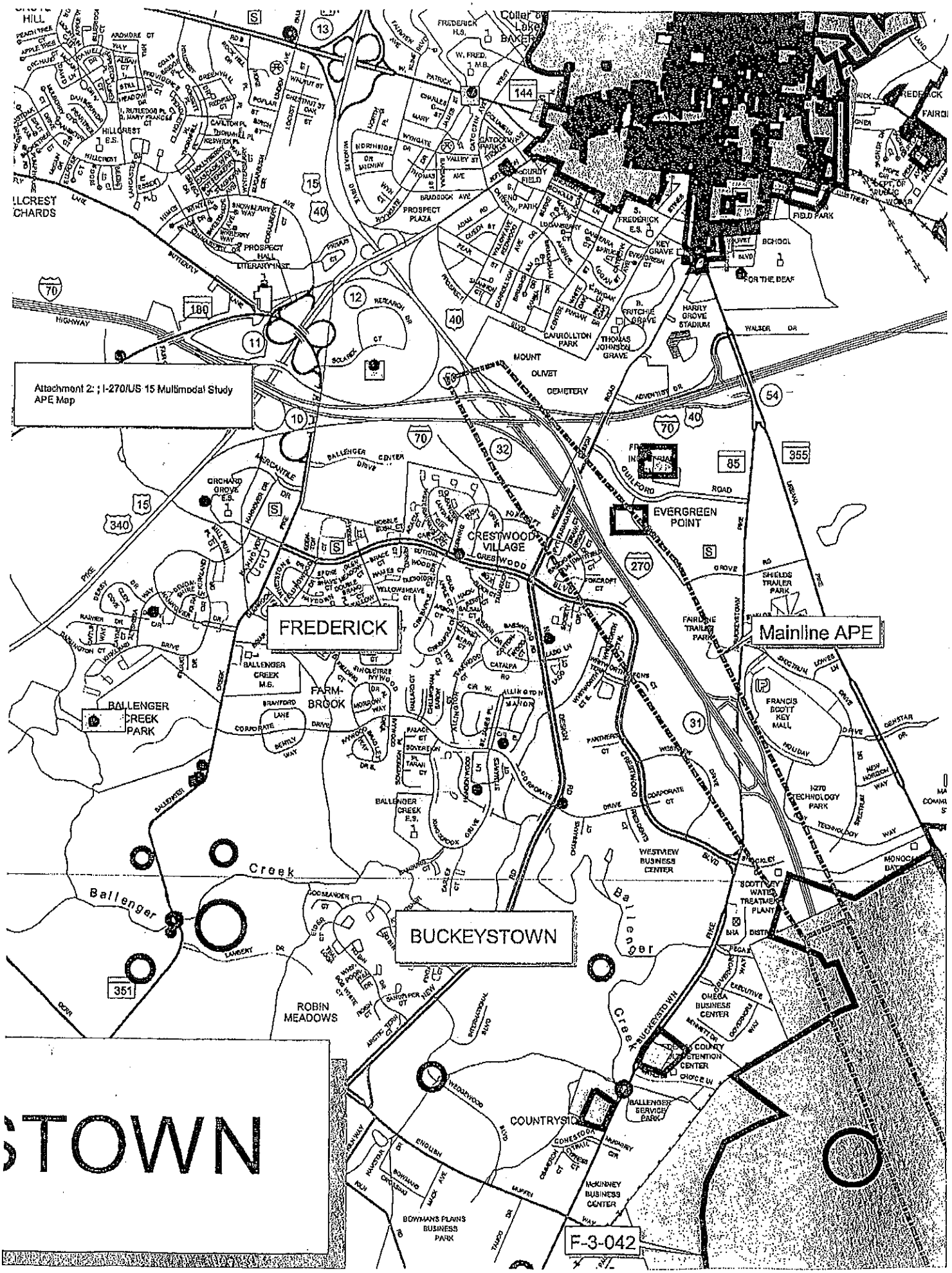

Attachment 2: I-270/US 15 Multimodal Study
APE Map
Mainline APE
URBANA
HYATTSTOWN
LITTLE
REGIONAL
PARK
MILES
CORNER
THOMPSONS
CORNER
RANGERS
WOODS
HICKORY
HILL
SUGAR
LOAF
VISTA
LITTLE BENNETT
GOLF COURSE
P.B. DYE
GOLF COURSE
HYATTSTOWN
CARNIVAL
GROUNDS
TRUCK
WEIGH
STATION
MONTGOMERY
Little Bennett Creek
Sopher
Branch
Creek
270
109
355
75

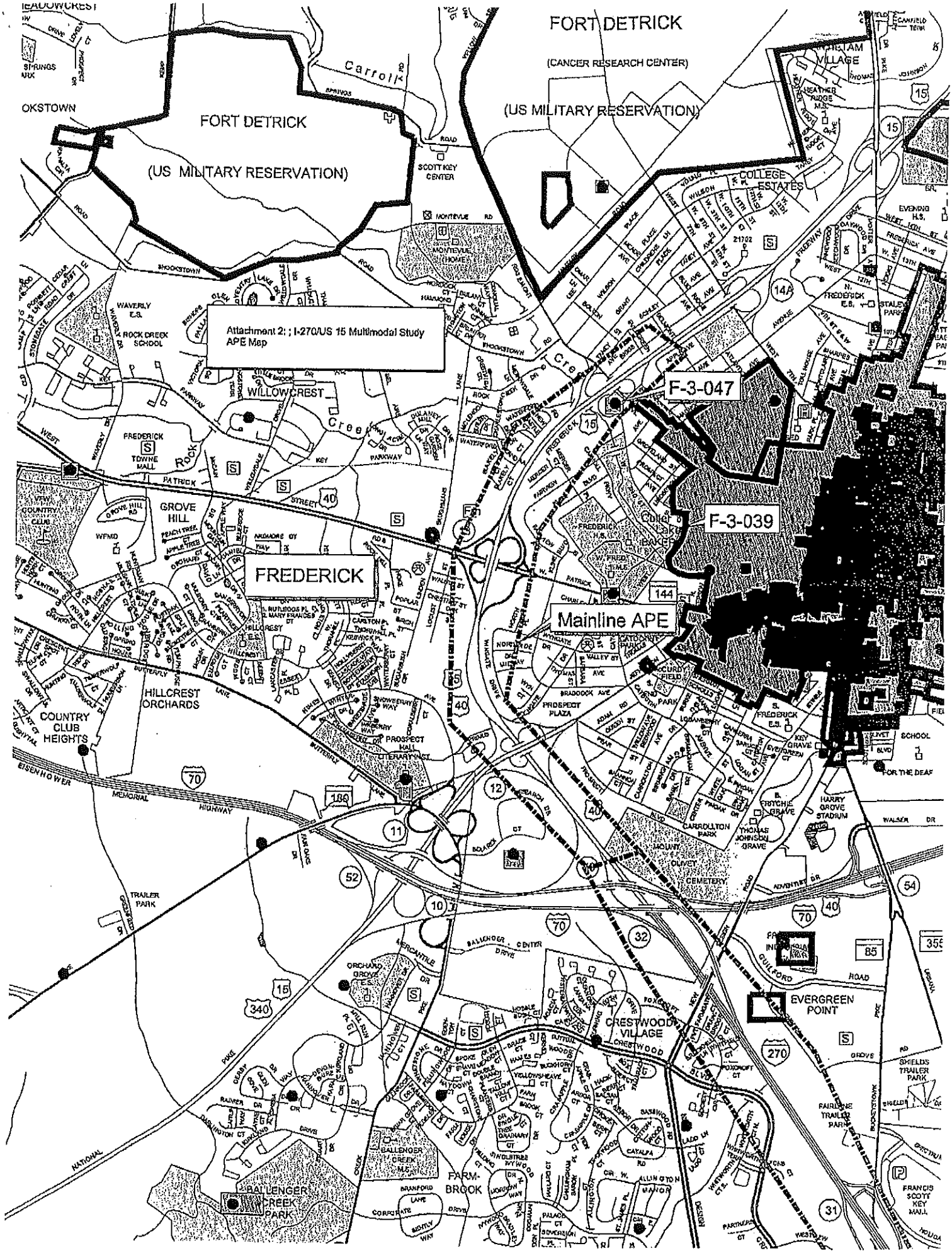

Attachment 2: I–270/US 15 Multimodal Study
APE Map
Mianline APE
URBANA
FREDERICK COUNTY
MONTGOMERY COUNTY
URBANA OVERLOOK
BURNT HICKORY
SUGAR LOAF MEADOWS
OLD ORCHARD ESTATE
RANGERS WOODS
HYATTSTOWN
THURSTON
P.B. DYE GOLF COURSE
URBANA LAKE FISH MANAGEMENT AREA
MONTECITO INDUSTRIAL PARK
Bennett Creek
Little Bennett Creek
Fahrney Branch
80
355
270
109
22
26

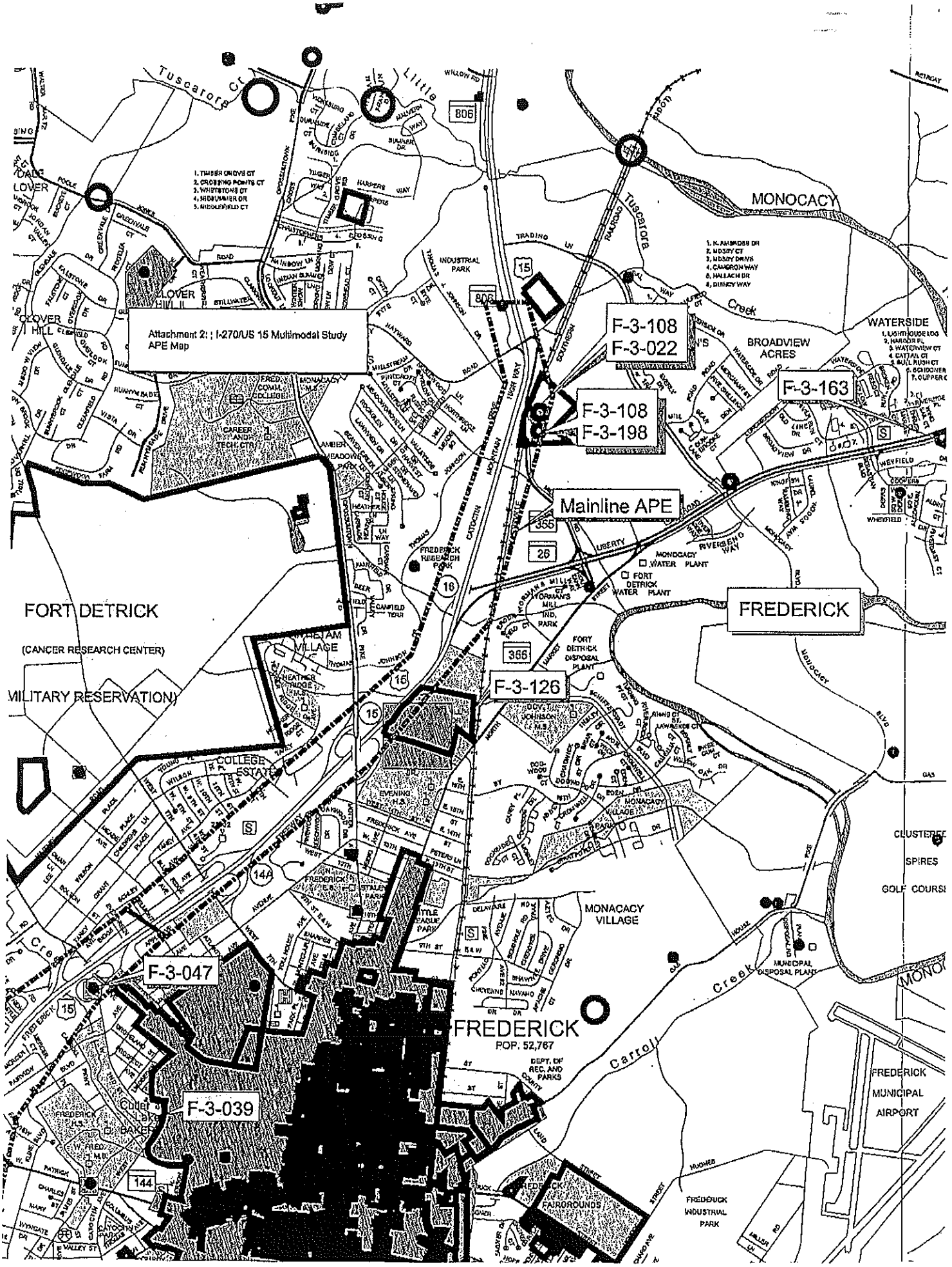

ARMORY PARK
SCENIC OVERLOOK
270
355
80
URBANA
URBANA COMMUNITY PARK
URBANA E.S.
URBANA H.S.
URBANA HIGH SCHOOL
WORTHINGTON GOLF COURSE
MANOR GOLF COURSE
Branch
URBANA OVERLOOK
HOPE VALLEY HILLS
SUGARLOAF ESTATES
BURNT HICKORY
URBANA LAKE FISH MANAGEMENT AREA
EISENHOWER MEMORIAL HIGHWAY
Bennett
North
Creek
FINGERBOARD ROAD
SUGARLOAF PKWY
MAINLINE APE

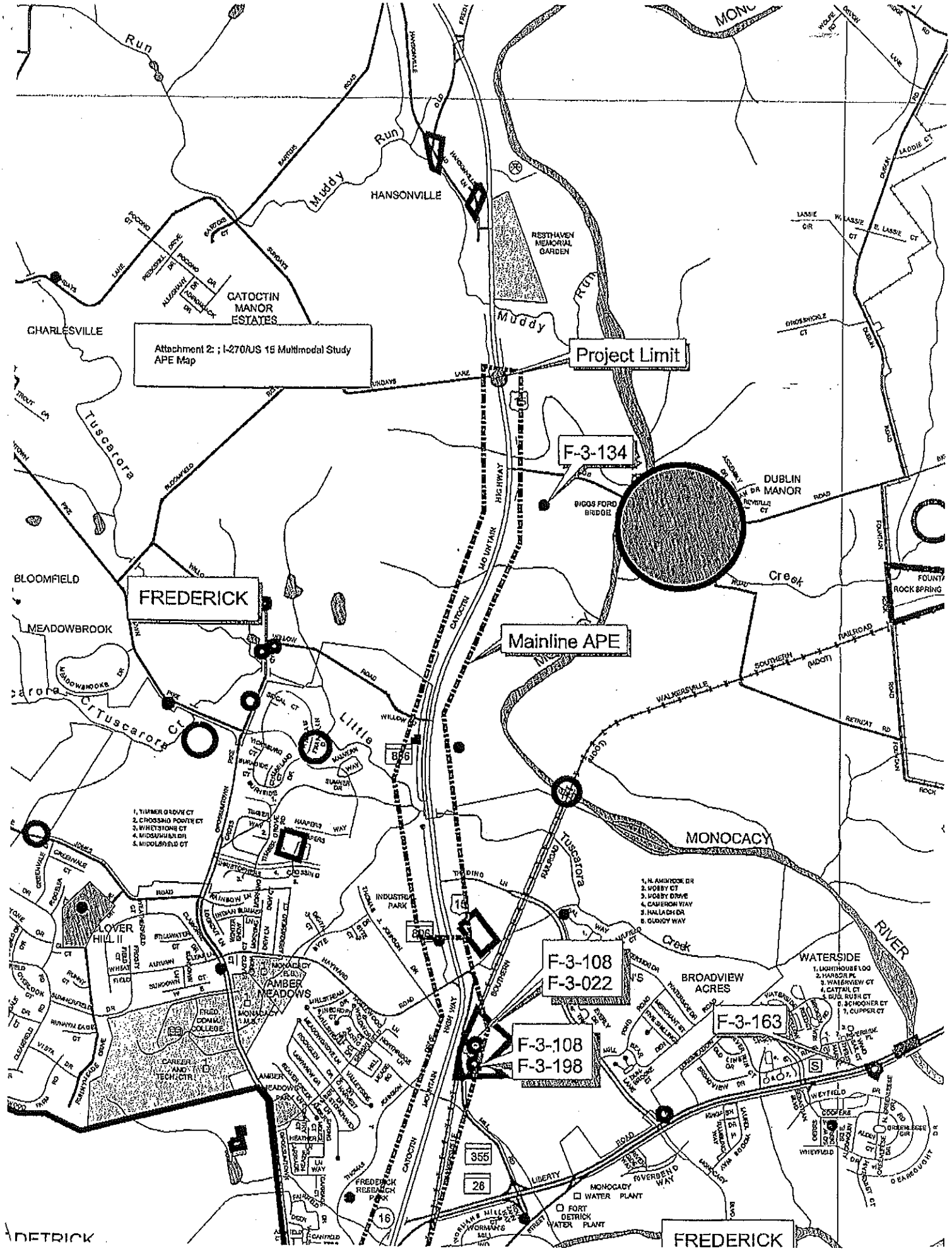

Attachment 2: I-270/US 15 Multimodal Study
APE Map
Mianline APE
BUCKEYSTOWN
URBANA
ARABY PARK
SCENIC OVERLOOK
MARYLAND SHERIFFS BOYS RANCH
WORTHINGTON GOLF
MANOR COURSE
URBANA
URBANA H.S.
355
80
270


Attachment 2: ; I-270/US 15 Multimodal Study APE Map
F-3-042
Mainline APE
BUCKEYSTOWN
MONOCACY
HOPELAND
LIME
COUNTRYSIDE
ARABY PARK
SCENIC OVERLOOK
MARYLAND SHERIFFS BOYS RANCH
MICHAELS MILL (1730)
BUCKEYSTOWN PARK
WORTHINGTON GOLF
MANOR COURSE
WESTVIEW BUSINESS CENTER
OMEGA BUSINESS CENTER
McKINNEY BUSINESS CENTER
BOWMANS PLAINS BUSINESS PARK
SCOTT KEY WATER TREATMENT PLANT
MARC COMMUTER STA.
270 TECHNOLOGY PARK
FRANCIS SCOTT KEY MALL
CHALLENGER SERVICE PARK
COUNTY DETENTION CENTER
SHA
31
85
80
880
270


Attachment 2: ; I-270/US 15 Multimodal Study
APE Map
FREDERICK
Mainline APE
BUCKEYSTOWN
F-3-042
CRESTWOOD VILLAGE
EVERGREEN POINT
BALLENGER CREEK PARK
BALLENGER CREEK M.S.
FARM-BROOK
BALLENGER CREEK E.S.
ROBIN MEADOWS
COUNTRYSIDE
FREDERICK H.S.
HILLCREST E.S.
ORCHARD GROVE E.S.
S. FREDERICK E.S.
PROSPECT PLAZA
PROSPECT HALL
CARROLLTON PARK
MOUNT OLIVET CEMETERY
HARRY GROVE STADIUM
THOMAS JOHNSON GRAVE
FRANCIS SCOTT KEY MALL
I-270 TECHNOLOGY PARK
WESTVIEW BUSINESS CENTER
OMEGA BUSINESS CENTER
FREDERICK COUNTY DETENTION CENTER
BALLENGER SERVICE PARK
MCKINNEY BUSINESS CENTER
BOWMANS PLAINS BUSINESS PARK
SCOTTS KEY WATER TREATMENT PLANT
SHIELDS TRAILER PARK
FAIRVIEW TRAILER PARK
Ballenger Creek
Ballenger Creek


Attachment 2: ; I-270/US 15 Multimodal Study
APE Map
F-3-047
F-3-039
Mainline APE
FREDERICK
FORT DETRICK
(US MILITARY RESERVATION)
FORT DETRICK
(CANCER RESEARCH CENTER)
(US MILITARY RESERVATION)
OKSTOWN
SCOTT KEY CENTER
COLLEGE ESTATES
WILLIAM VILLAGE
WAVERLY E.S.
ROCK CREEK SCHOOL
WILLOWCREST
FREDERICK TOWNE MALL
GROVE HILL
HILLCREST ORCHARDS
COUNTRY CLUB HEIGHTS
PROSPECT HALL
BAKER
N. FREDERICK E.S.
S. FREDERICK E.S.
PRIDESPECT PLAZA
CARROLLTON PARK
THOMAS JOHNSON GRAVE
HARRY GROVE STADIUM
MOUNT OLIVET CEMETERY
EVERGREEN POINT
CRESTWOOD VILLAGE
ORCHARD GROVE E.S.
BALLENGER CREEK PARK
FARM-BROOK
FAIRLANE TRAILER PARK
SHIELDS TRAILER PARK
FRANCIS SCOTT KEY MALL
EISENHOWER MEMORIAL HIGHWAY
BALLENGER CREEK


Attachment 2: ; I-270/US 15 Multimodal Study
APE Map
F-3-108
F-3-022
F-3-108
F-3-198
F-3-163
Mainline APE
F-3-126
F-3-047
F-3-039
FREDERICK
POP. 52,767
FORT DETRICK
(CANCER RESEARCH CENTER)
MILITARY RESERVATION)
MONOCACY
FREDERICK
WATERSIDE
BROADVIEW ACRES
MONACACY VILLAGE
COLLEGE ESTATE
CLOVER HILL
FREDERICK MUNICIPAL AIRPORT
SPIRES GOLF COURSE
Tuscarora Creek
Little Tuscarora Creek
Carroll Creek
Culler Lake
806
15
355
26
16
144
14A


Attachment 2: ; I-270/US 15 Multimodal Study
APE Map
Project Limit
F-3-134
Mainline APE
F-3-108
F-3-022
F-3-108
F-3-198
F-3-163
FREDERICK
HANSONVILLE
CATOCTIN MANOR ESTATES
CHARLESVILLE
BLOOMFIELD
MEADOWBROOK
DUBLIN MANOR
MONOCACY
BROADVIEW ACRES
WATERSIDE
AMBER MEADOWS
HOVER HILL II
FREDERICK RESEARCH PARK
MONOCACY WATER PLANT
FORT DETRICK WATER PLANT
RESTHAVEN MEMORIAL GARDEN
Muddy Run
Little Tuscarora Cr
Tuscarora Creek
Monocacy River
Catoctin Mountain
Southern Railroad
Walkersville Southern Railroad (MDOT)
Bigos Ford Bridge
Rock Spring
Fred. Comm. College
Career and Technical Ctr.
Industrial Park
355
26
15
16
85
806
806

I-270/US 15 Multi-Modal Study (Attachment 3)

SHA's Supplemental Impact Assessment Technical Report for Standing Historic Properties based on 2007 Plan Set for Alternatives 6A/B and 7A/B (Express Toll Lanes (ETL) and Corridor Cities Transitway (CCT)). In order to obtain comments from MHT about all the I-270/US 15 Multi-Modal Study alternatives that SHA is studying, this Technical Report also includes information about the impacts of Alternatives 3A/B, 4A/B and 5A/B/C on standing historic properties. Please note that neither Alternative 1 (No Build) nor Alternative 2 (TSM/TDM) would affect any standing historic property in the APE.

Atomic Energy Commission Building, U.S. Department of Energy, M:19-41
The Atomic Energy Commission Building, U.S. Department of Energy (AEC Building) is a 109 acre property in the southwest quadrant of the I-270/MD 118 interchange. It is eligible for the NRHP under Criterion A because of its association with the development of new nuclear sciences from 1957 to 1975. The AEC Building is also eligible for the NRHP under Criterion C, as an example of a mid-twentieth century office building designed by Voorhees, Walker, Smith & Smith, a prominent architecture firm from New York City. Voorhees, Walker, Smith & Smith were well known for creating this kind of scientific research office park. The AEC Building also meets the requirements for Criterion Consideration G because of the significant activities that occurred within the building extending to 1975. During this period more than one hundred nuclear power plants and ships were constructed or planned for construction in the United States. The historic boundary matches the property line boundary as shown on Montgomery County Tax Map EU562, Parcel 615 (2006). Its setting is contained within this parcel which provides a campus or park-like setting for the office building that is an important physical contrast with the scientific work that occurs inside the building.

Under the I-270/US 15 Multi-Modal Study Alternatives 3A/B, 4A/B, 5A/B/C, 6A/B and 7A/B, both SHA and MTA will require new right-of-way for both the I-270 highway widening and the Corridor Cities Transitway (CCT) alignment. For the southbound lanes of I-270, SHA will acquire 2.97 acres along approximately 1,500 feet of the eastern boundary of the historic property. This includes outside widening, relocation of the ramp from MD 118 eastbound to I-270 southbound and adding ETL direct access ramps. The CCT alignment will require 8.75 acres of right-of-way within the historic property near its southern and western boundaries. In addition, the AEC Building would also lose access to two remnant portions of the property which would be cut off from the main portion of the property by the placement of the CCT through the property. A CCT station is planned just south of the MD 118 crossing. The transitway alignment is based on the Montgomery County Master Plan alignment. The CCT will impact the western edge of the DOE property, and cross the Middlebrook Road entrance driveway via an at-grade crossing, and affect the rear parking area and secondary (non-public) access to Middlebrook Road.

SHA's noise level testing indicates that neither the highway widening nor the construction of the CCT will raise the noise levels to 67 decibels (dBA), which is the

amount that would require SHA and MTA to account for the noise impacts to the historic property. The physical and atmospheric impacts will alter the integrity of the setting, design, workmanship, feeling and association through the loss of the parking lot, lawn and woods surrounding the Atomic Energy Commission Building and the addition of a CCT station. These alterations meet the requirements of 36 CFR §800.5 and the I-270/US 15 Multi-Modal Study Alternatives 6A/B and 7A/B will have an adverse impact on the Atomic Energy Commission Building, U.S. Department of Energy.

The historic property did not meet the NRHP Eligibility Criteria in 2002 and SHA and MTA did not consider the impacts of Alternatives 3A/B, 4A/B, 5A/B/C in the DEIS. However, in order to account for them in the final EIS, SHA has evaluated the impacts of these Alternatives, using information from the 2002 DEIS. Based on the 2007 review of the 2002 DEIS, SHA and MTA have determined that Alternatives 3A/B, 4A/B, 5A/B/C will have similar physical and atmospheric impacts as Alternatives 6A/B and 7A/B to the historic property. We make this determination because SHA will require 2.97 acres, while MTA will require 8.75 acres for Alternatives 3A/B, 4A/B and 5A/B/C. As a result, the Adverse Effect Criteria found at 36 CFR §800.5 are met and the I-270/US 15 Multi-Modal Study Alternatives 3A/B, 4A/B, 5A/B/C will have an adverse impact on the Atomic Energy Commission Building, U.S. Department of Energy.

England/Crown Farm, M:20-7 The England/Crown Farm is a 75.80 acre parcel that was formerly a farm. Agricultural production included hay and dairying, which ceased in 1990. The historic standing structures on the property include a late nineteenth century dwelling and a single story log house. Frame barns demonstrate the dairy operations, and these date from the late nineteenth and early twentieth centuries. In 2006, the farm was sold to developers who will construct a mixed use, residential and commercial development in the near future. The developer has an agreement with the City of Gaithersburg to preserve certain buildings within the property. However, SHA continues to evaluate the historic property as a farm, eligible for the NRHP under Criteria A (Montgomery County agricultural history) and C (architecture).

The CCT alignment and hiker/biker trail will cross diagonally through the property from southeast to northwest and require 4.11 acres of land in order to accommodate the transit options for Alternatives 6A/B and 7A/B. As a result, the physical impacts resulting in loss of the England/Crown Farm property and alteration of its setting, design, feeling and association by Alternatives 6A/B and 7A/B meet the requirements of 36 CFR §800.5, and the I-270/US 15 Multi-Modal Study will have an adverse impact on the England/Crown Farm. On February 15, 2002, SHA and MTA determined that Alternatives 3A/B, 4A/B, 5A/B would have adverse physical impacts to the England/Crown Farm as discussed in the Adverse Effect Letter and 2002 DEIS. Based on SHA's 2007 review of the 2002 DEIS and Adverse Effect Letter, these alternatives continue to have the same impacts. However, the I-270 highway widening for Alternatives 3A/B, 4A/B, 5A/B, 6A/B and 7A/B will have no impact on the historic property because it is well removed from I-270. ,

SHA and MTA have investigated measures to minimize impacts by the CCT to England/Crown Farm. These are included in the design incorporating minimum railroad design criteria for typical section elements (i.e. 2:1 slopes, profile grades, level grade for station/platform areas) and track center offsets. In addition, the alignment profile is at-grade. An additional technique being considered, in consultation with the developer, would extend the CCT alignment more perpendicularly across the historic property, then extend the CCT along Fields Road approximately 2,500 feet before crossing over I-270 and Shady Grove Road This alignment would decrease the impacts to 3.43 acres..

Belward Farm, M:20-21 The Belward Farm is a 107 acre parcel that is eligible for the NRHP under Criteria A (Montgomery County agricultural history). It is a vernacular dwelling built by Ignatius Ward in 1891. The two-story, single pile, frame structure has a L-shaped footprint. The exterior is clad in weatherboard with a gable roof. The Belward Farm has been reduced from a larger parcel as a result of acquisition by Johns Hopkins University and construction of modern office buildings on the Johns Hopkins Belward Research Campus. Also along the northern boundary of the farm is a single family residential development, Mission Hills, which was constructed between 1991 and 1999. The farm is not in agricultural production nor used as a stock farm, although its house remains standing. SHA and MTA anticipate that 0.64 acres will be required for the construction of the CCT Decoverly Station parking facility and the hiker-biker trail. The land required does not occur in an important viewshed, but is in an area that has been altered through unsympathetic construction. As a result, SHA has determined that the requirements of 36 CFR §800.5 are met, and that there will be an adverse impact on the Belward Farm by the I-270/US 15 Multi-Modal Study Alternatives 6A/B and 7A/B. On February 15, 2002, SHA and MTA determined that Alternatives 3A/B, 4A/B, 5A/B would have adverse physical impacts to the Belward Farm as discussed in the Adverse Effects Letter and 2002 DEIS. MTA and SHA believe that the 0.64 acre impact can be reduced by MTA's avoidance and/or minimization of the historic property through redesign. Based on SHA's 2007 review of the 2002 Adverse Effect Letter and DEIS, these alternatives continue to have the same impacts.

Monocacy National Battlefield, F-3-42 The Monocacy National Battlefield is a 1,647 acre National Park which was the site of the 1864 battle between the Confederate Army and Union troops defending Washington, D.C. It was made a National Historic Landmark (NHL) in 1973 for its importance as a battlefield (NRHP Criterion A, events). SHA proposes to widen I-270 within the NHL. The I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7 will require widening of I-270 by four lanes in each direction. There is no transit planned for this portion of I-270. On February 15, 2002, SHA determined that Alternatives 3, 4, and 5 would have adverse physical impacts on the Monocacy National Battlefield NHL as discussed in the Adverse Effect Letter and 2002 DEIS. Each Alternative calls for widening of the highway. Three measures were considered to minimize the impacts: steeper slopes, retaining walls, and reduced inside shoulder width. Based on SHA's 2007 review of the 2002 DEIS and Adverse Effect Letter, these alternatives continue to have adverse impacts on the Monocacy National Battlefield. Avoidance of the NHL is not possible due to the location of I-270.

We previously consulted with the National Park Service (NPS) during 2002 and 2003 and intend to continue the consultation through meetings and correspondence. Most recently SHA met with the NPS on November 8, 2007. During the previous consultation, SHA proposed to reduce the physical impact of the highway by shifting the highway's centerline west to avoid any change in the existing east right-of-way location. By proposing highway widening only to the west, the eastern side of the park would not be impacted. The NPS agreed with this proposed minimization strategy. The centerline shift will require 14.50 acres from the historic property. At the same time, the traffic noise will also impact the historic landmark. The current noise levels are between 66 dBA and 67 dBA, and SHA's models indicate that the 2030 build options noise levels will rise to between 76 dBA and 77 dBA. Under the Federal Highway Administration's (FHWA) guidelines this amount of noise is considered an impact requiring abatement. However, previous discussions between SHA and the NPS concluded that noise barriers would not be appropriate in this location. SHA will continue to work with the NPS to find ways to avoid or reduce the noise impacts where possible. However, as now planned the I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7 through the Monocacy National Battlefield, and the attendant increase in traffic noise meet the requirements of 36 CFR §800.5 and will have an adverse impact on the historic landmark.

Spring Bank, F-3-22 Spring Bank is a large 2-1/2-story brick dwelling constructed in 1880, on the east side of Worman's Mill Road facing west. The railroad tracks lay between Spring Bank and US 15 in Harmony Grove. The historic property was listed in the NRHP in 1984 under Criterion C (architecture). SHA proposes to widen US 15 to 4 lanes in each direction. Under the I-270/US 15 Multi-Modal Study Alternatives 6 and 7 this widening of US 15 will not have physical impacts on the historic property. Also, there are no transit options for this portion of the highway. However, SHA's noise studies indicate that the current noise levels are 66 dBA, and by 2030, the noise will rise to 69 dBA. Because Spring Bank is the only building in this part of the APE that is listed or eligible for the NRHP, construction of a noise barrier is not considered cost effective. As a result, the increased noise impacts meet the requirements of 36 CFR §800.5 and will cause an adverse impact to Spring Bank under the I-270/US 15 Multi-Modal Study Alternatives 6 and 7. On February 15, 2002, SHA determined that Alternatives 3, 4, and 5 would have no adverse impacts on Spring Bank as discussed in the Adverse Effect Letter and 2002 DEIS. Based on SHA's 2007 review of the 2002 Adverse Effect Letter and DEIS, we have determined that these alternatives will continue to have no adverse impact on Spring Bank, because the noise levels do not exceed 66 dBA as shown in the 2002 DEIS, and there are no physical impacts..

Rose Hill Manor, F-3-42 Rose Hill is a 2-1/2-story brick house, five bays wide on the south facade of its main block. The design of the house is a transitional style, between the late Georgian of Tidewater Maryland, and the Greek Revival style, and the building is listed in the NRHP under Criterion C (architecture). Thomas Johnson (1732-1819), a former Governor of Maryland, was a close political associate, honored friend, and champion of George Washington, whose eulogy Johnson delivered. Governor Johnson chose Rose Hill as his retirement home during the end of the 18th century. Erected

during the mid-1790s by his daughter and son-in-law, the Governor retired there during the last years of his life.

Under the I-270/US 15 Multi-Modal Study Alternatives 6 and 7, SHA proposes to acquire 0.19 acres of property from the 30 acre parcel along the west tax parcel boundary of Rose Hill. Although Rose Hill's NRHP boundary extends west across US 15, Rose Hill Manor no longer controls any property west of its boundary with US 15. As a result, SHA has only assessed impacts to the property based on the direct construction impacts. SHA proposes to use a 2:1 slope to construct the new highway, and this will require 0.19 acres of the historic property for right-of-way. SHA is also considering using a retaining wall as a way to reduce the physical impacts, although it may increase the visual impacts. As additional information becomes available, SHA will provide it to MHT for your comments.

SHA's noise testing indicates that the current noise level is 70 dBA, and the 2030 build levels will rise to between 72 and 75 dBA. This noise level meets the requirements for FHWA's abatement criteria, but the construction of a noise barrier is not cost effective. SHA will work with Rose Hill Manor to find ways to avoid or reduce this noise impact. However, as now planned the I-270/US 15 Multi-Modal Study Alternatives 6 and 7 improvements meet the requirements of 36 CFR §800.5 and will cause an adverse impact to the historic property. On February 15, 2002, SHA determined that Alternatives 3, 4, and 5 would have an adverse impact on Rose Hill as discussed in the Adverse Effect Letter and 2002 DEIS. The highway widening requires 0.88 acres of right-of-way from Rose Hill Manor. Also, noise levels were not considered in 2002, and according to the DEIS, noise levels for Alternatives 3B and 5A were 71 dBA and 70 dBA in the morning and afternoon tests. These noise levels meet the requirements for adverse impacts under 36 CFR §800.5. Based on SHA's 2007 review of the 2002 Adverse Effect Letter and DEIS, we have determined that these alternatives will continue to have an adverse impact on Rose Hill.

Schifferstadt, F-3-47 Schifferstadt is a two-part composition, standing on 1.5 acres. Built in the eighteenth century, the main block, of fieldstone construction, is two stories in height and three bays in length. A two-story, two-bay, brick addition at the south end, recessed back from the east facade of the main block but flush to its west facade, was built in the early nineteenth century. It is both architecturally and historically important to Frederick City and County and to Western Maryland in general because of its indisputably close relationship to the early German settlement of this region and to the German traditions that are still in evidence today. MHT holds a preservation easement on the property, and it has been listed in the NRHP since 1974 NRHP under Criteria A (eighteenth century German settlement of Frederick) and C (mid-eighteenth century architecture).

SHA proposes to widen US 15 by two lanes in each direction, and the widening will require a 0.09 acre take from Schifferstadt within the historic boundary and preservation easement boundary. SHA's noise studies indicate that the current noise level is 66 dBA, and under both build scenarios, the noise will rise to 68 dBA. Because

this historic property is the only affected property in this portion of the APE, it does not meet the requirements for a noise barrier. As a result, SHA has determined that the physical and audible impacts of the I-270/US 15 Multi-Modal Study Alternatives 6 and 7 meet the requirements of 36 CFR §800.5 and will have an adverse impact on Schifferstadt. SHA has considered constructing a retaining wall in the area that is designated for a sewer easement. The wall would be at least 7 feet high and would extend 200 feet along the new US 15 alignment. There are several ways to place the retaining wall and as a result, several different potential impacts. In consideration of its size, SHA has determined that the result would be adverse visual impacts to the historic property.

On February 15, 2002, SHA determined that Alternatives 3, 4, and 5 would have no adverse impacts on Schifferstadt as discussed in the Adverse Effect Letter and 2002 DEIS. Based on SHA's 2007 review of the 2002 Adverse Effect Letter and DEIS, we have determined that these alternatives will have an adverse impact on Schifferstadt, because the noise levels will rise to between 68 and 70 dBA as shown in the 2002 DEIS. Furthermore, SHA did not identify the MHT historic preservation easement on Schifferstadt. A portion of the 1.25 acres right-of-way take from Baker Park includes right-of-way from within Schifferstadt's historic and easement boundaries. Since SHA currently requires 0.9 acres for right-of-way for Alternatives 6 and 7, SHA believes that that is the amount needed for Alternatives 3, 4 and 5.

Birely-Roelkey Farm, F-3-134 – The farm is a 114 acre parcel in active agricultural production. It is located north of Frederick and was built about 1851 by John Birely, a prominent local businessman. The farm is an important link to the agrarian tradition of Frederick County. Birely-Roelkey Farm is eligible for listing in the NRHP under Criteria A (Frederick County agricultural history) and C (architecture). SHA requires 13.46 acres in order to construct an interchange between US 15 and Biggs Ford Road. SHA's noise studies indicate that the noise levels are well below the required abatement levels. They are presently 58 dBA, and will rise to 61 dBA by 2030. Because the physical impact of the I-270/US 15 Multi-Modal Study Alternatives 6 and 7 project meets the requirements of 36 CFR §800.5, these proposed improvements will have an adverse impact on the historic property. SHA investigated reconfiguring the US 15/Biggs Ford Road interchange northbound ramp. However, it would increase the impacts to the commercial and residential properties that are northeast of US 15 and Biggs Ford Road. SHA is also considering including retaining walls to further reduce the impacts of the new interchange. However, the retaining walls may cause visual impacts that are greater than the physical impacts. SHA will continue to investigate the options and provide MHT with information for additional comments as they become available. On February 15, 2002, SHA determined that Alternatives 3, 4, and 5 would have an adverse impact on Birely-Roelkey Farm as discussed in the Adverse Effect Letter and 2002 DEIS. Based on SHA's 2007 review of the 2002 Adverse Effect Letter and DEIS, we have determined that these alternatives will continue to have an adverse impact on Birely-Roelkey, because of the physical impacts from the right-of-way required for the construction of the Biggs Ford Road interchange as discussed in the 2002 Adverse Effect Letter.

Harmony Grove Union Chapel (F-3-197) Harmony Grove Union Chapel is a one-story frame church on the west side of Worman's Mill Road. It has German siding and a gable façade with double entrances. The building is three bays long and has an interior chimney. The windows are six over six sash and some have louvered shutters. MHT determined the building to be eligible for the National Register of Historic Places under Criterion A because of its association with early Methodism and Criterion C as an example of a type of rural church. It stands on Parcel 264 as shown on Frederick County Tax Map 57 (2006). SHA will not require any right-of-way or temporary and permanent easements in order to construct the improvements to US 15. No noise testing was completed at the Harmony Grove Union Chapel, although a nearby site closer than Spring Bank was tested. SHA has determined that there will be no adverse impact to this historic property under I-270/US 15 Multi-Modal Study Alternatives 6 and 7 because the alterations to the highway occur at the rear of the property, outside of its historic boundary, and the noise impacts do not exceed 67 dBA.

Because the historic property did not meet the NRHP Eligibility Criteria in 2002, the impacts of Alternatives 3, 4, and 5 were not considered in SHA's February 15, 2002 Adverse Effect Letter or the 2002 DEIS. However, in order to account for the impacts in the final EIS, SHA has evaluated the impacts of these Alternatives, using information from the 2002 DEIS. SHA has determined that Alternatives 3, 4 and 5 will have no adverse impacts to the historic property. We make this determination because these alternatives have the same footprint as Alternatives 6 and 7, and also do not require right-of-way from the historic property, nor cause noise impacts that meet or exceed 67 dBA.

Worman House (F-3-198) The Worman House is a two-story brick main pile with a rear wing dwelling, dating from between 1850 to 1870 by the Frederick County Landmarks Foundation. Additional outbuildings, dating to ca. 1890 include a small frame barn, a frame privy, and garden shed all with vertical board and batten siding. The interior was not surveyed in either 1990 or 2002. The property also contains an unoccupied log building that is believed to have been a slave quarter. The Worman House retains excellent integrity and significant architectural distinction and is eligible for inclusion in the NRHP under Criterion A (architecture). Tax Parcel 109 as shown on Frederick County Tax Map 57 (2006) is the extent of the historic property. SHA did not conduct any noise testing at the Worman House, although a nearby site closer than Spring Bank was tested. SHA has determined that there will be no adverse impact to this historic property because the widening of US 15 will be obscured by the buildings that stand on the west side of Worman's Mill Road in front of US 15.

Because the historic property did not meet the NRHP Eligibility Criteria in 2002, the impacts of Alternatives 3, 4, and 5 were not considered in SHA's February 15, 2002 Adverse Effect Letter or the 2002 DEIS. However, in order to account for the impacts in the final EIS, SHA has evaluated the impacts of these alternatives, using information from the 2002 DEIS. SHA has determined that Alternatives 3, 4 and 5 will have no adverse impacts to the historic property.

•Attachment 4
Areas Requiring Supplemental Archeological Survey

- New ramp configuration at I-270/New Cut Rd intersection. This area is near a tributary of Little Seneca Creek, and parts of the original interchange design were assigned a high potential by Fiedel (2000). The ramp configuration has been modified, and parts of the redesigned ramp will require archeological study. It is recommended that this be deferred until Alternative Selection, or until this project segment moves into design.

- A new SWM pond at Monocacy Boulevard requires testing; other SWM pond locations will need to be reviewed for archeological potential as well. It is recommended that archeological fieldwork be deferred until Alternative Selection, or until this section of the project moves into design.

- The I-270/Biggs Ford interchange and new Park & Ride Lot 15-2. This project element is located on a terrace of Monocacy River, and was assigned a high prehistoric potential (Barse 2001). It is recommended that this work be deferred until Alternative Selection, or until this section of the project moves into design.

- Alignment shift on the England Crown Farm: This area of rolling terrain is largely undisturbed, and is considered to have a high historic archeological potential.

- Police Vehicle Impound Lot Operations-Maintenance Facility /Watkins Grove; and Pepco Transmission Line site: This area is partially disturbed and partially mature, undeveloped woodlands, and is located near a tributary of Great Seneca Creek. The Pepco site is close to Great Seneca Creek, and would only be used for Light Rail. The Police Vehicle Lot would be used for either Light Rail or Bus Rapid Transit. These locations are considered to have a high archeological potential.

- Observation Drive Operations / Maintenance Facility: This area would provide facilities for both Light Rail and Bus Rapid Transit, depending on the selected alternative. Site 18MO472 has been recorded nearby. The area overlooks Little Seneca Creek, and undisturbed portions of the proposed Facility and any alignment changes to the CCT are considered to have a high prehistoric archeological potential. A farmstead overlooking Little Seneca Creek is considered to have a high historic archeological potential.

- Note that the Comsat Station Park & Ride, previously assigned a high archeological potential, is far removed from surface water. At this time, the site is considered to have low potential based on the negative results of previous testing, but the site will need to be re-assessed when more refined design plans are available.

Attachment 5: Effects Table
Project Name: I-270/ US 15 Multi-Modal Study

January 4, 2008

				Alternate 3A/3B		Alternate 4A/4B		Alternate 5A/5B		Alternate 6A/6B		Alternate 7A/7B			
Resource	Type	SHA NR Det.	SHPO Opinion	Impact	SHPO Concur	Impact	SHPO Concur	Impact	SHPO Concur	Impact	SHPO Concur	Impact	SHPO Concur	Attachment	Remarks
Browningsville Historic District (M:10-13)	HD	NR	NR	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Possible impact from wetland creation. Will be re-coordinated at a later date
Hyattstown Historic District (M:10-59)	HD	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Clarksburg Historic District (M:13-10)	HD	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Clarksburg School (M:13-52)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Pleasant Fields (M:19-1)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Atomic Energy Commission Building, U.S. Department of Energy (M:19-41),	S	NR	NR 4/13/07	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	1/2008		Presumed Adverse for Alternatives 3A, 3B, 4A, 4B, 5A, 5B and 5C because of the right-of-way requirements for both the highway and the CCT components.
England Crown Farm (M:20-7)	S	NRE	NRE 9/24/1996	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008		
Belward Farm (M:20-21)	S	NRE	NRE 9/24/1996	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008		Request concurrence with revised boundary. Property take will be .64 acres.
Billy King Farm (M:20-32)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Summit Hall (M:21-3)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)

Washington Grove Historic District (M:21-5)	HD	NR	NR	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
C. G. Statler House (M:21-7)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Observatory Heights Historic District (M:21-136)	HD	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Brookes, Russell and Walker Historic District (M:21-165)	HD	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Thomas Cannery (M:21-168)	S	NR	NR	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Chestnut/Meem Historic District (M:21-178)	HD	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Casey Barn (M:21-183	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Linden Grove (F-1-80)	S	NRL	NRL	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Motter-Simmons Farm (F-2-144)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Spring Bank (F-3-22)	S	NR	NR	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008		Previous No Adverse Effect determination changed to Adverse based on Noise Study in the 2002 DEIS which shows adverse noise impacts that were not previously considered.
Frederick Historic District (F-3-39)	HD	NR	NR	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Guilford (F-3-40)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Monocacy Battlefield NHL (F-3-42)	NHL	NHL	NHL	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008		*No transit portion in Frederick County*
Monocacy Battlefield 18FR30	A	NHL	NHL	None	11/5/99	None	11/5/99	None	11/5/99	None	Requested 1/2008	None	Requested 1/2008		No Impacts to Archeological Site-NPS concurred (1999 testing found no resources within APE)

Schifferstadt (F-3-47)	S	NR	NR	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008		Previous No Adverse Effect determination changed to Adverse based on Noise Study in the 2002 DEIS which shows adverse noise impacts that were not previously considered. *No transit portion in Frederick County*
Rose Hill Manor (F-3-126)	S	NR	NR	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008		*No transit portion in Frederick County*
Birely-Roelkey Farm (F-3-134)	S	NRE	NRE 11/26/01	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008		*No transit portion in Frederick County*
Hoke-Grove Limestone Property (F-3-145)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Harmony Grove Union Church (F-3-197)	S	NRE	NRE 8/2002	No Adverse	Requested 1/2008	No Adverse	Requested 1/2008	No Adverse	Requested 1/2008	No Adverse	Requested 1/2008	No Adverse	Requested 1/2008		
Worman House (F-3-198)	S	NRE	NRE 8/2002	No Adverse	Requested 1/2008	No Adverse	Requested 1/2008	No Adverse	Requested 1/2008	No Adverse	Requested 1/2008	No Adverse	Requested 1/2008		
Stancioff House (F-7-3)	S	NR	NR	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Dr. Perry House (F-7-35)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Francis Mantz House (F-7-59)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
Urbana Historic District (F-7-73)	HD	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
H. William Tabler House (F-7-130)	S	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)
8435 Woodville Road (F-8-161)	S	NRE	NRE 4/13/07	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Possible impact form wetland creation. Will re-coordinate at a later date.
18FR106	A	ND	ND	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008		Anticipated impacts from Wetland Mit Site 23; If impacted, evaluation would be done as break-out project
18FR110	A	ND	ND	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008	None	Outside APE (1999 testing found no resources extending within APE)

18FR148A	A	NRE	NRE 11/5/99	None	11/5/99	None	11/5/99	None	11/5/99	None	Requested 1/2008	None	Requested 1/2008		No impacts anticipated under mainline alternatives; SHA will ensure avoidance through oversight of design plans
18FR178	A	ND	ND	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008		Anticipated impacts from Wetland Mit Site 23; If impacted, evaluation would be done as break-out project
18FR350	A	ND	ND	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008		Anticipated impacts from Wetland Mit Site 28; If impacted, evaluation would be done as break-out project
18FR351	A	ND	ND	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008		Anticipated impacts from Wetland Mit Site 28; If impacted, evaluation would be done as break-out project
18FR607	A	ND	ND	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008	Adverse*	Requested 1/2008		Anticipated impacts from Wetland Mit Site 25; If impacted, evaluation would be done as break-out project
Effect				AE	Requested 1/2008	AE	Requested 1/2008	AE	Requested 1/2008	AE	Requested 1/2008	AE	Requested 1/2008		

*** Impacts *may* be adverse if these archeological sites are determined NRHP eligible and the specified wetland mitigation site is constructed; an Adverse Impact is assumed for the purposes of Section 106 coordination.**

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)
NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)
SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion
Impact: None, No Adverse, Adverse
Effect: NPA (No Properties Affected), NAE (No Adverse Effect), AE (Adverse Effect)
Bold rows indicate review action requested

Concurrence with the MD State Highway Administration's Determination(s) of Eligibility and/or Effects

Project Number: FR192B11 **MHT Log No.** 200800113 & 200801047
Project Name: I-270/US 15 Multi-Modal Corridor Study
County: Montgomery and Frederick Counties
Letter Date: April 4, 2008

The Maryland Historical Trust has reviewed the documentation attached to the referenced letter and concurs with the MD State Highway Administration's determinations as follows:

Eligibility (as noted in the Eligibility Table [Attachment 5):

[X] Concur
[ ] Do Not Concur

Effect (as noted in the Effects Table [N/A]):

[ ] No Properties Affected
[ ] No Adverse Effect
[ ] Conditioned upon the following action(s) (see comments below)
[X] Adverse Effect

Agreement with FHWA's Section 4(f) criteria of temporary use (as detailed in the referenced letter, if applicable):

[ ] Agree

Agreement with FHWA's de minimus impact finding (as detailed in the referenced letter, if applicable):

[ ] Agree

Comments:

SEE ATTACHED CONTINUATION SHEET

By: _____ 6-26-08
MD State Historic Preservation Office/ Maryland Historical Trust — Date

Return by U.S. Mail or Facsimile to:
Dr. Julie Schablitsky, Cultural Resources Team Leader, Project Planning Division,
MD State Highway Administration, P.O. Box 717, Baltimore, MD 21203-0717
Telephone: 410-545-8870 and Facsimile: 410-209-5004

Concurrence with the MD State Highway Administration's Determination(s) of Eligibility and/or Effects

CONTINUATION SHEET #1
Maryland Historical Trust Comments

Project Number: FR192B11 **MHT Log No.** 200800113 & 200801047
Project Name: I-270 / US 15 Multi-Modal Study

The Maryland Historical Trust (Trust) provides the following comments in addition to the concurrence indicated on the previous page:

The Maryland Historical Trust concurs that the I-270 / US 15 Multi-Modal Study will adversely affect historic properties. We will work with SHA to finalize the undertaking's effect on specific historic properties upon the completion of avoidance and minimization efforts and in coordination with the other relevant consulting parties for this undertaking.

Comments on Eligibility & Property Boundaries:

- *Belward Farm* (MIHP No. M:20-21) – Due to recent residential and institutional development activities within the National Register boundary for Belward Farm, we concur with SHA's revised boundary. The acreage included with the NR-boundary has been reduced from 124 acres to 107 acres and corresponds to Tax Parcel N500 on Tax Map FS341.

- *SHA Bridge 1509600* (Part of MIHP No. M:37-16) – MHT concurs that this railroad bridge constructed in 1987 is not individually eligible and does not contribute to the significance of the Baltimore and Ohio Railroad Metropolitan Branch.

- *SHA Bridge No. 1514800* (Part of MIHP No. M:37-16) - MHT concurs that this railroad bridge constructed in 1956 is not individually eligible and does not contribute to the significance of the Baltimore and Ohio Railroad Metropolitan Branch.

MHT concurs that the following properties are located within the project's Area of Potential Effects:

- Atomic Energy Commission Building, U.S. Department of Energy (MIHP No. M:19-41)
- England-Crown Farm (MIHP No. M:20-17)
- Belward Farm (MIHP No. M:20-21)
- Monocacy Battlefield (MIHP No. F-3-42)
- Spring Bank (MIHP No. F-3-22)
- Schifferstadt (MIHP No. F-3-47)
- Rose Hill Manor (MIHP No. F-3-126)
- Birely-Roelkey Farm (MIHP No. F-3-134)
- Harmony Grove Union Church (MIHP No. F-3-197)
- Worman House (MIHP No. F-3-198)
- Browningsville Historic District (MIHP No. M:10-13) as a possible wetland mitigation site
- 8435 Woodville Road (MIHP No. F-8-161) as a possible wetland mitigation site
- Archeological sites 18FR106, 18FR178, 18FR350, 18FR351, 18FR607 as possible wetland mitigation sites

Archeology:
Based on the information presented in SHA's recent submittals, we acknowledge that SHA will need to complete further archeological investigations for this undertaking particularly for the proposed ancillary activities (storm water management facilities, wetland mitigation sites, reforestation areas, ancillary areas

related to the transit alternatives, etc.) as well as in response to further alignment modifications. We encourage SHA to complete these studies early in the design phases for these related activities to allow adequate time to consider and address any potential effects to significant archeological resources.

Consulting Parties:
Throughout SHA's project planning and consultation for this undertaking over multiple years, SHA has appropriately broadened its efforts to identify and invite various interested parties to participate in the Section 106 consultation efforts. The recent NPS letter, dated 18 April 2008, identified three additional parties (the Civil War Preservation Trust, Frederick Historic Sites Consortium, and American Battlefield Protection Program) that should be invited to participate and we concur with that request. We note that the Frederick Historic Sites Consortium serves as the administrative entity for the Certified Heritage Area located in the project APE, the Heart of the Civil War Heritage Area. Additional relevant parties may arise as the consultation process continues.

Resolution of Adverse Effects:
As documented in SHA's correspondence, the project alternatives under consideration will adversely affect multiple and varied historic properties located in Frederick and Montgomery Counties – including a National Historic Landmark as well as a property on which the Trust holds a perpetual historic preservation easement. The project will also likely affect additional archeological properties that have not yet been identified. While the nature of the undertaking itself (the widening of an existing transportation corridor) poses challenges for the avoidance of adverse effects, SHA should continue to vigilantly pursue further design modifications and solutions that would avoid and minimize the adverse effects on all identified historic properties.

We understand that SHA is scheduling meetings and site visits with Trust staff and consulting parties for each of the properties that may be adversely affected by the undertaking. These meetings/site visits are essential to provide a clear flow of information about the alternatives, see current conditions and constraints, understand resource significance and character defining features, exchange views, and facilitate consultation among the involved parties. We look forward to continuing our discussions with SHA and the consulting parties regarding avoidance and minimization efforts.

cc: Consulting parties

January 17, 2008

Re: Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Montgomery and Frederick Counties, Maryland
USGS *Urbana* and *Frederick* 7.5' Quadrangles

Ms. Marie Rust
NHL Program Director
National Park Service
NPS Northeast Region
200 Chestnut Street
Philadelphia, Pennsylvania 19106

Dear Ms. Rust:

Introduction and Project Description

This letter serves to inform the National Park Service (NPS) of the Maryland State Highway Administration's (SHA) finding that proposed project FR192B11, the I-270/ US 15 Multi-Modal Study, would have an adverse effect on historic properties, including the Monocacy National Battlefield, which is a National Historic Landmark (NHL). SHA has begun consultation with the Maryland State Historic Preservation Officer (MD SHPO or Maryland Historical Trust [MHT]), and a copy of the letter SHA sent to him as well as a copy of the letter sent to the Monocacy National Battlefield's Superintendent, Ms. Susan Trail, are included as **Attachments 1** and **2**. SHA invites the NPS and the Monocacy National Battlefield to consult with us and the MD SHPO regarding impacts of the project on the NHL.

The overall project involves the addition of travel lanes along I-270 and US 15, and construction of a bus or rail transit system (the Corridor Cities Transitway, or CCT). Several combinations of highway and transit strategies are under study for the overall project, including general-purpose lanes, high occupancy vehicle (HOV) lanes, express toll lanes (ETL), auxiliary lanes, and collector-distributor (C-D) lanes; the transit component of the project includes Light Rail Transit (LRT), Bus Rapid Transit (BRT), or Premium Bus Service. The four alternatives are Alternative 6A (ETL/LRT), 6B (ETL/BRT), 7A (ETL/LRT) and 7B (ETL/BRT).

On February 15 and March 14, 2002, SHA coordinated effects for Build Alternatives 3A, 3B, 4A, 4B, 5A, 5B and 5C, each of which consist of a highway and a transit component. The highway component varies from the addition of one (1) High Occupancy Vehicle (HOV) lane in each direction (Alternative 3); one (1) general-purpose lane (GPL) in each direction (Alternative 4); or an "Enhanced Alternative" adding one HOV and one GPL in each direction (Alternative

5). In general, the Enhanced Alternative has greater right-of-way needs and impacts. The transit component will not extend to the Monocacy National Battlefield.

SHA has subsequently developed Alternatives 6A, 6B, 7A and 7B, and has made minor design changes to the CCT and to previously coordinated Alternatives. The two new alternatives involve Express Toll Lanes (ETL), tolled highway lanes intended to provide new capacity sooner than possible through traditional funding sources. Alternative 6 would add two ETLs in Montgomery County and one ETL in Frederick County. Alternative 7 would add two ETLs in Montgomery County and two ETLs in Frederick County. In Frederick County the alternatives are limited to ETL lanes south of the Monocacy Battlefield. Through the Monocacy Battlefield to MD 85, the highway will be widened to four general purpose lanes in each direction, outside SHA's current right-of-way for I-270. SHA would not construct any transit options within the NHL's boundaries, or along US 15 from I-70 to Biggs Ford Road. The plans indicate areas where SHA is considering stormwater management (SWM) facilities. However, at this time, no decision has been made regarding location or design. SHA will stipulate coordination of these and other ancillary activities through the project's Memorandum of Agreement (MOA), and continue consultation with all parties as the designs become available.

Since our previous correspondence on the project, we have coordinated with you and MHT through a series of meetings held in 2002 and 2003. Our most recent meeting occurred on November 8, 2007, in order to re-initiate contact with NPS staff. SHA's discussions with the NPS focused on impacts to the Monocacy National Battlefield, and on previously discussed methods to avoid, minimize, or mitigate those impacts. We will contact NPS and MHT to resume formal coordination meetings in the near future.

Project plans for the highway component is included as **Attachment 3**.

Funding:

Federal funds are anticipated for this project.

Area of Potential Effects

In determining the Area of Potential Effects (APE) for this project, SHA considered possible physical, visual, atmospheric and/or audible impacts to historic properties, both archeological sites and standing structures, that would diminish any National Register of Historic Places (NRHP) qualifying characteristic or the historic property's integrity. The project involves widening of I-270 and US 15, which will require right-of-way, as well as permanent and temporary easements. For the transit portion, both the CCT's LRT and the BRT will require new right-of-way, and permanent and temporary easements. However, because of the character of the built environment in both Montgomery and Frederick counties, SHA has limited the APE to those identified standing historic properties that are within 250 feet of the proposed I-270, US 15, or the CCT right-of-way lines. In areas where the historic property's boundary extends beyond 250 feet, SHA has included the entire property, such as Monocacy National Battlefield NHL. The archeological survey area within the APE is defined as the limits of construction where ground disturbance would occur. Because SHA is not coordinating effects of ancillary projects outside the proposed right-of-way limits at this time, there are no discontiguous portions of the APE. Alternatives 3A, 3B, 4A, 4B, 5A, 5B, 5C, 6A, 6B, 7A and 7B fall within the same

abatement. However, previous discussions between SHA and the NHL concluded that noise barriers would not be appropriate in this location because they would visually intrude on the setting of the battlefield. SHA will continue to work with the NHL to find ways to avoid or reduce the noise impacts where possible. However, as now planned the I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7 through the Monocacy National Battlefield, and the attendant increase in traffic noise meet the requirements of 36 CFR §800.5 and will have an adverse impact on the historic landmark.

Archeology: SHA archeologist Richard Ervin assessed the archeological potential of the referenced project based on examination of previous archeological studies, soils maps, historic maps, topographic maps, and the SHA-GIS Cultural Resources Database. The re-assessment follows the previous June 1, 2001 assessment by SHA archeologist Mary Barse. Field visits were made to the project area on July 20 and July 26, 2007.

The project crosses the Eastern and Western Piedmont Physiographic Provinces. Topography ranges from moderately to steeply rolling terrain with incised stream valleys in the south and east, to the broad, level terraces of the Monocacy River floodplain to the north and west. A total of 87 sites have been recorded on the USGS Germantown and Urbana quadrangles.

Fiedel's (2000) investigation of Alternatives 3, 4, and 5 considered the I-270 and US 15 mainlines, the CCT, new interchanges, improvements to existing interchanges, and park and ride locations. Fiedel's survey, which included testing within the boundary of the NHL, recorded eight archeological sites and examined six recorded sites. None of these sites are within the NHL boundary, and none of the investigated sites were considered eligible for listing on the NRHP. The MHT concurred with these determinations on November 26, 2001.

Impacts from Alternative 6 and 7 are generally similar to Alternatives 3 and 5 examined by Fiedel (2000). Minor design changes have been made over the last seven years, including a reconfigured ramp at the proposed New Cut Road interchange; a new Park & Ride lot at the Biggs Ford Road interchange; and a relocated stormwater management pond at the Monocacy Road interchange. Numerous additional stormwater management pond locations will be determined for the project in the future.

No further archeological investigations are recommended for Alternatives 6 and 7 at this time, because the APE was examined by Fiedel (2000). Further archeological work will likely be required in the future as design details are developed. After design issues are resolved and the number of alternatives is reduced, SHA plans to resume negotiations with MHT and the NPS to begin to develop a Memorandum of Agreement stipulating that SHA shall undertake additional archeological identification of high potential areas not covered by our previous survey, together with evaluation and mitigation work, as warranted. In our November 8, 2007 meeting, previous suggestions for minimizing impacts to potential undiscovered archeological resources within the NHL boundary were summarized. SHA will continue coordination with MHT and the NHL to minimize all impacts to the Monocacy Battlefield NHL to the maximum extent possible.

Attachment 5 provides the results of the archeological assessment indicating the areas that will require supplemental archeological identification studies for current design impacts. A

footprint and the defined APE also applies to historic properties associated with the earlier identified alternatives. The APE is indicated on the attached SHA quadrangle maps for Urbana and Frederick (**Attachment 4**).

Identification Methods and Results

Potentially significant architectural and archeological resources were both researched as part of the historic investigation instigated by the I-270/ US 15 Multi-Modal Study, SHA Project No. FR192B11.

Architecture: SHA Architectural Historian Anne E. Bruder consulted project files, including previous correspondence, the project's 2002 Draft Environmental Impact Statement (DEIS), the SHA-GIS quadrangle mapping; and attended project meetings. Ms. Bruder made field visits on June 6, August 4, August 8, August 9, August 27 and October 2, 2006 and again on October 1 and October 9, 2007 to assess the potential for historic standing structures and project impacts.

Historic properties in the APE exemplify important events in central Maryland such as colonial settlements, the Civil War, the railroad, agriculture, and suburban Federal government facilities in both counties. Historic properties include the Monocacy National Battlefield (F-3-42), which is also a National Historic Landmark.

As you know, the Monocacy National Battlefield is a 1,647 acre National Park which was the site of the 1864 battle between the Confederate Army and Union troops defending Washington, D.C. It was made a National Historic Landmark (NHL) in 1973 for its importance as a battlefield (NRHP Criterion A). SHA proposes to widen I-270 within the NHL. The I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7 will require widening of I-270 by two lanes in each direction. There is no transit component proposed for this portion of I-270. On February 15, 2002, SHA determined that Alternatives 3, 4, and 5 would have adverse physical impacts on the Monocacy National Battlefield NHL as discussed in the Adverse Effect Letter and 2002 DEIS. Each Alternative calls for widening of the highway. Three measures were considered to minimize the impacts: steeper slopes, retaining walls, and reduced inside shoulder width. Based on SHA's 2007 review of the 2002 DEIS and Adverse Effect Letter, these alternatives continue to have adverse impacts on the Monocacy National Battlefield. Avoidance of the NHL is not possible due to the location of I-270.

We previously consulted with the NHL and NPS during 2002 and 2003 and intend to continue the consultation through meetings and correspondence. Most recently SHA met with the NHL on November 8, 2007. During the previous consultation, SHA proposed to reduce the physical impact of the highway by shifting the highway's centerline west to avoid any change to existing right-of-way to the east. By proposing highway widening only to the west, the eastern side of the park would not be impacted. The NPS agreed with this proposed minimization strategy. The centerline shift will require 14.50 acres from the historic property.

At the same time, the traffic noise will also impact the historic landmark. The current noise levels are between 66 dBA and 67 dBA, and SHA's models indicate that the 2030 build options noise levels will rise to between 76 dBA and 77 dBA. Under the Federal Highway Administration's (FHWA) guidelines this amount of noise is considered an impact requiring

number of these areas are identified in SHA's September 5, 2001 letter to MHT, while other locations reflect more recent design modifications. Additional work will also likely be needed for stormwater management pond locations that have not yet been identified.

Review Request

Please examine the attached maps, plans, and Effects Table. We request your concurrence by February 17, 2008 that there would be adverse effects on historic properties by FR192B11, the I-270/ US 15 Multi-Modal Study. Pursuant to the requirements of the implementing regulations in 36 CFR Part 800, SHA seeks your assistance in identifying historic preservation issues related to this project (see 36 CFR §§800.2(c)(4) and (6), and 800.3(f) for information on consulting parties, and §§800.4 and 800.5 for identification of historic properties and assessment of effects). For additional information regarding the Section 106 regulations, see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact the Maryland State Highway Administration or the Maryland Historical Trust. If no response is received by February 17, 2008, we will assume that the Monocacy National Battlefield declines to participate. Please call Ms. Anne E. Bruder at 410-545-8559 (or via email at abruder@sha.state.md.us) with questions regarding standing structures for this project. Mr. Richard Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archeology.

Very truly yours,

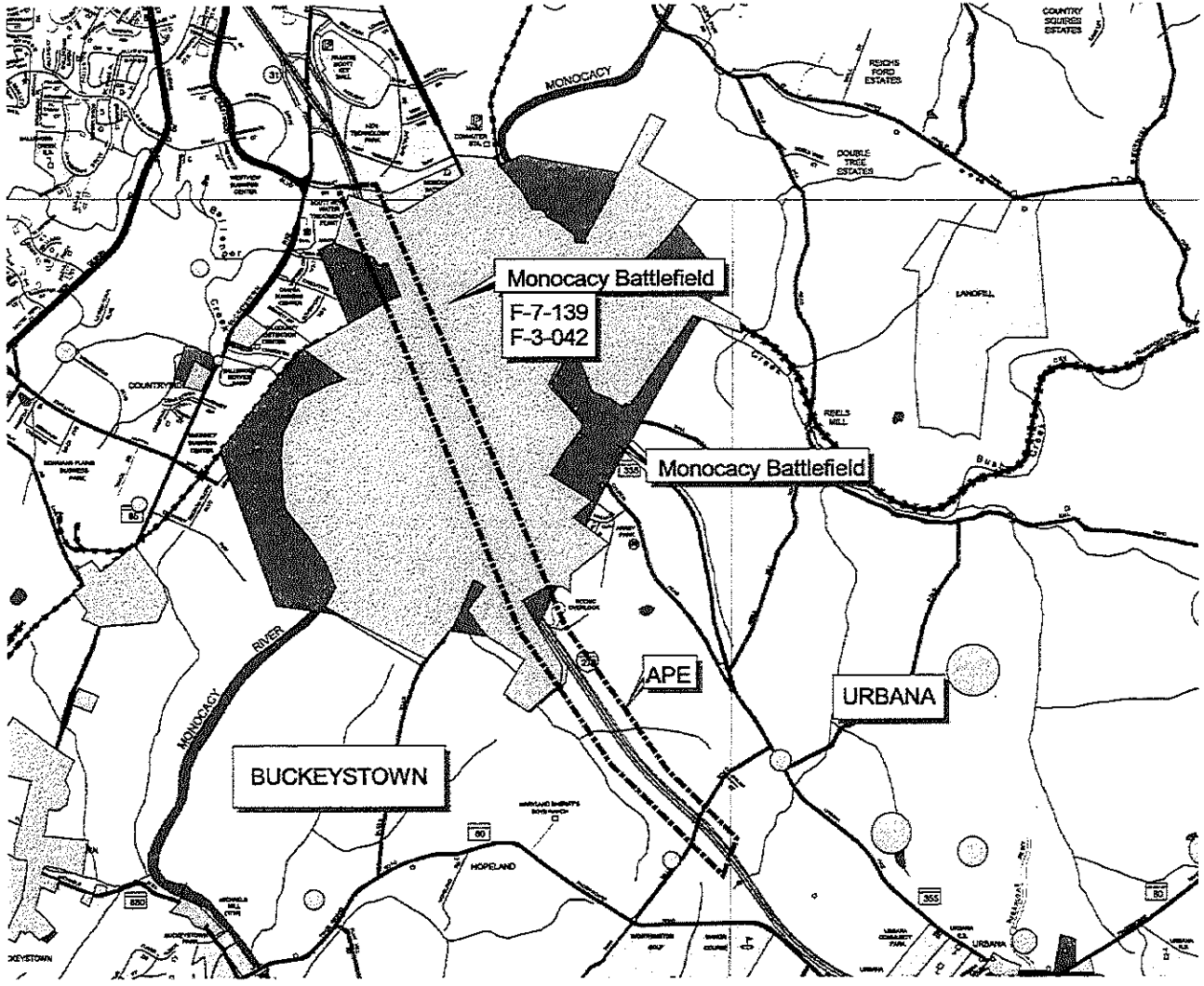
Bruce M. Grey
Deputy Director
Office of Planning and
Preliminary Engineering

by: for Julie S. Schablitsky
Cultural Resources Team Leader
Project Planning Division

Attachments:
1) SHA's January 10, 2008 effects letter to the MD SHPO
2) SHA's January 16, 2008 effects letter to the Monocacy National Battlefield
3) Project Plans
4) Area of Potential Effects Maps
5) Archeology Table

cc: Ms. Anne E. Bruder, SHA-PPD (w/Attachments 1-4)
Ms. Janet Davis, Frederick County Historic Preservation Commission
Ms. Anne Elrays, SHA-PPD (w/Attachments 1-4)
Mr. Richard Ervin, SHA-PPD
Mr. Dan Johnson, FHWA
Mr. Don Klima/Ms. Carol Legard, ACHP (w/Attachments)
Mr. Joseph Kresslein, SHA-OPPE
Dr. Julie Schablitsky, SHA-PPD
Ms. Susan Trail, Superintendent, Monocacy National Battlefield
Mr. Russell Walto, SHA-PPD (w/Attachments)

I-270/US 15 Multi-Modal Study
SHA Project No. FR192B11
APE Map



Swsdoe3m.shp
Maryland Historical Trust Easements
Maryland Inventory of Historic Places
National Register of Historic Places
USGS Topo Quad Index

Roads
CO
IS
MD
OP
SR
US
MU
GV

County

N
W
E
S

2 0 2 4 Miles

•Attachment 5
Areas Requiring Supplemental Archeological Survey

- New ramp configuration at I-270/New Cut Rd intersection. This area is near a tributary of Little Seneca Creek, and parts of the original interchange design were assigned a high potential by Fiedel (2000). The ramp configuration has been modified, and parts of the redesigned ramp will require archeological study. It is recommended that this be deferred until Alternative Selection, or until this project segment moves into design.

- A new SWM pond at Monocacy Boulevard requires testing; other SWM pond locations will need to be reviewed for archeological potential as well. It is recommended that archeological fieldwork be deferred until Alternative Selection, or until this section of the project moves into design.

- The I-270/Biggs Ford interchange and new Park & Ride Lot 15-2. This project element is located on a terrace of Monocacy River, and was assigned a high prehistoric potential (Barse 2001). It is recommended that this work be deferred until Alternative Selection, or until this section of the project moves into design.

- Alignment shift on the England Crown Farm: This area of rolling terrain is largely undisturbed, and is considered to have a high historic archeological potential.

- Police Vehicle Impound Lot Operations-Maintenance Facility /Watkins Grove; and Pepco Transmission Line site: This area is partially disturbed and partially mature, undeveloped woodlands, and is located near a tributary of Great Seneca Creek. The Pepco site is close to Great Seneca Creek, and would only be used for Light Rail. The Police Vehicle Lot would be used for either Light Rail or Bus Rapid Transit. These locations are considered to have a high archeological potential.

- Observation Drive Operations / Maintenance Facility: This area would provide facilities for both Light Rail and Bus Rapid Transit, depending on the selected alternative. Site 18MO472 has been recorded nearby. The area overlooks Little Seneca Creek, and undisturbed portions of the proposed Facility and any alignment changes to the CCT are considered to have a high prehistoric archeological potential. A farmstead overlooking Little Seneca Creek is considered to have a high historic archeological potential.

- Note that the Comsat Station Park & Ride, previously assigned a high archeological potential, is far removed from surface water. At this time, the site is considered to have low potential based on the negative results of previous testing, but the site will need to be re-assessed when more refined design plans are available.

Martin O'Malley, *Governor*
Anthony Brown, *Lt. Governor*

SHA Driven to Excel
State Highway Administration
Maryland Department of Transportation

John D. Porcari, *Secretary Designate*
Neil J. Pedersen, *Administrator*

January 17, 2008

Re: Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Montgomery and Frederick Counties, Maryland
USGS *Urbana* and *Frederick* 7.5' Quadrangles

Ms. Susan Trail, Superintendent
Monocacy National Battlefield
National Park Service
480 Urbana Pike
Frederick MD 21704

Dear Ms. Trail:

Introduction and Project Description

This letter serves to inform the Monocacy National Battlefield of the Maryland State Highway Administration's (SHA) finding that proposed project FR192B11, the I-270/ US 15 Multi-Modal Study, would have an adverse effect on historic properties, specifically the Monocacy National Battlefield, which is a National Historic Landmark (NHL). SHA has begun consultation with the Maryland State Historic Preservation Officer (MD SHPO or Maryland Historical Trust [MHT]), and a copy of the letter SHA sent to him is included as **Attachment 1**. SHA invites the Monocacy National Battlefield to consult with us and the MD SHPO regarding impacts of the project on the NHL.

The overall project involves the addition of travel lanes along I-270 and US 15, and construction of a bus or rail transit system (the Corridor Cities Transitway, or CCT). Several combinations of highway and transit strategies are under study for the overall project, including general-purpose lanes, high occupancy vehicle (HOV) lanes, express toll lanes (ETL), auxiliary lanes, and collector-distributor (C-D) lanes; the transit component of the project includes Light Rail Transit (LRT), Bus Rapid Transit (BRT), or Premium Bus Service. The four alternatives are identified as Alternative 6A (ETL/LRT), 6B (ETL/BRT), 7A (ETL/LRT) and 7B (ETL/BRT).

On February 15 and March 14, 2002, SHA coordinated effects for Build Alternatives 3A, 3B, 4A, 4B, 5A, 5B and 5C, each of which consist of a highway and a transit component. The highway component varies from the addition of one (1) High Occupancy Vehicle (HOV) lane in each direction (Alternative 3); one (1) general-purpose lane (GPL) in each direction (Alternative 4); or an "Enhanced Alternative" adding one HOV and one GPL in each direction (Alternative 5). In general, the Enhanced Alternative has greater right-of-way needs and impacts. The transit component will not extend to the Monocacy National Battlefield.

SHA has subsequently developed Alternatives 6A, 6B, 7A and 7B, and has made minor design changes to the CCT and to previously coordinated Alternatives. The two new alternatives involve Express Toll Lanes (ETL), tolled highway lanes intended to provide new capacity sooner than possible through traditional funding sources. Alternative 6 would add two ETLs in Montgomery County and one ETL in Frederick County. Alternative 7 would add two ETLs in Montgomery County and two ETLs in Frederick County. In Frederick County the alternatives are limited to ETL lanes south of the Monocacy Battlefield. Through the Monocacy Battlefield to MD 85, the highway will be widened to four general purpose lanes in each direction, outside SHA's current right-of-way for I-270. SHA would not construct any transit options within the NHL's boundaries, or along US 15 from I-70 to Biggs Ford Road. The plans indicate areas where SHA is considering stormwater management (SWM) facilities. However, at this time, no decision has been made regarding location or design. SHA will stipulate coordination of these and other ancillary activities through the project's Memorandum of Agreement (MOA), and continue consultation with all parties as the designs become available.

Since our previous correspondence on the project, we have coordinated with you and MHT through a series of meetings held in 2002 and 2003. We appreciated the opportunity for our most recent meeting on November 8, 2007. SHA found the meeting to be very useful, and we look forward to resuming our discussions. We will contact NPS and MHT to resume formal coordination meetings in the near future.

Project plans for the highway component is included as **Attachment 2**.

Funding:

Federal funds are anticipated for this project.

Area of Potential Effects

In determining the Area of Potential Effects (APE) for this project, SHA considered possible physical, visual, atmospheric and/or audible impacts to historic properties, both archeological sites and standing structures, that would diminish any National Register of Historic Places (NRHP) qualifying characteristic or the historic

property's integrity. The project involves widening of I-270 and US 15, which will require right-of-way, as well as permanent and temporary easements from the Monocacy National Battlefield. For the transit portion, both the CCT's LRT and the BRT will require new right-of-way, and permanent and temporary easements. However, because of the character of the built environment in both Montgomery and Frederick counties, SHA has limited the APE to those identified standing historic properties that are within 250 feet of the proposed I-270, US 15, or the CCT right-of-way lines. In areas where the historic property's boundary extends beyond 250 feet, SHA has included the entire property, such as Monocacy National Battlefield NHL. The archeological survey area within the APE is defined as the limits of construction where ground disturbance would occur. Because SHA is not coordinating effects of ancillary projects outside the proposed right-of-way limits at this time, there are no discontiguous portions of the APE. Alternatives 3A, 3B, 4A, 4B, 5A, 5B, 5C, 6A, 6B, 7A and 7B fall within the same footprint and the defined APE also applies to historic properties associated with the earlier identified alternatives. The APE is indicated on the attached SHA quadrangle maps for Urbana and Frederick (**Attachment 3**).

Identification Methods and Results

Potentially significant architectural and archeological resources were both researched as part of the historic investigation instigated by the I-270/ US 15 Multi-Modal Study, SHA Project No. FR192B11.

Architecture: SHA Architectural Historian Anne E. Bruder consulted project files, including previous correspondence, the project's 2002 Draft Environmental Impact Statement (DEIS), the SHA-GIS quadrangle mapping; and attended project meetings. Ms. Bruder made field visits on June 6, August 4, August 8, August 9, August 27 and October 2, 2006 and again on October 1 and October 9, 2007 to assess the potential for historic standing structures and project impacts.

Historic properties in the APE exemplify important events in central Maryland such as colonial settlements, the Civil War, the railroad, agriculture, and suburban Federal government facilities in both counties. Historic properties include the Monocacy National Battlefield (F-3-42), which is also a National Historic Landmark.

As you know, the Monocacy National Battlefield is a 1,647 acre National Park which was the site of the 1864 battle between the Confederate Army and Union troops defending Washington, D.C. It was made a National Historic Landmark (NHL) in 1973 for its importance as a battlefield (NRHP Criterion A, events). SHA proposes to widen I-270 within the NHL. The I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7

will require widening of I-270 by four lanes in each direction. There is no transit component
proposed for this portion of I-270. On February 15, 2002, SHA determined that Alternatives 3, 4, and 5 would have adverse physical impacts on the Monocacy National Battlefield NHL as discussed in the Adverse Effect Letter and 2002 DEIS. Each Alternative calls for widening of the highway. Three measures were considered to minimize the impacts: steeper slopes, retaining walls, and reduced inside shoulder width. Based on SHA's 2007 review of the 2002 DEIS and Adverse Effect Letter, these alternatives continue to have adverse impacts on the Monocacy National Battlefield. Avoidance of the NHL is not possible due to the location of I-270.

We previously consulted with the National Park Service (NPS) during 2002 and 2003 and intend to continue the consultation through meetings and correspondence. Most recently SHA met with the NPS on November 8, 2007. During the previous consultation, SHA proposed to reduce the physical impact of the highway by shifting the highway's centerline west to avoid any change to existing right-of-way to the east in the existing east right-of-way location. By proposing highway widening only to the west, the eastern side of the park would not be impacted. The NPS agreed with this proposed minimization strategy. The centerline shift will require 14.50 acres from the historic property. At the same time, the traffic noise will also impact the historic landmark. The current noise levels are between 66 dBA and 67 dBA, and SHA's models indicate that the 2030 build options noise levels will rise to between 76 dBA and 77 dBA. Under the Federal Highway Administration's (FHWA) guidelines this amount of noise is considered an impact requiring abatement. However, previous discussions between SHA and the NPS concluded that noise barriers would not be appropriate in this location, because they would visually intrude on the setting of the battlefield. SHA will continue to work with the NPS to find ways to avoid or reduce the noise impacts where possible. However, as now planned the I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7 through the Monocacy National Battlefield, and the attendant increase in traffic noise meet the requirements of 36 CFR §800.5 and will have an adverse impact on the historic landmark.

Archeology: SHA archeologist Richard Ervin assessed the archeological potential of the referenced project based on examination of previous archeological studies, soils maps, historic maps, topographic maps, and the SHA-GIS Cultural Resources Database. The re-assessment follows the previous June 1, 2001 assessment by SHA archeologist Mary Barse. Field visits were made to the project area on July 20 and July 26, 2007.

The project crosses the Eastern and Western Piedmont Physiographic Provinces. Topography ranges from moderately to steeply rolling terrain with incised stream valleys in the south and east, to the broad, level terraces of the Monocacy River floodplain to the

north and west. A total of 87 sites have been recorded on the USGS Germantown and Urbana quadrangles.

Fiedel's (2000) investigation of Alternatives 3, 4, and 5 considered the I-270 and US 15 mainlines, the CCT, new interchanges, improvements to existing interchanges, and park and ride locations. Fiedel's survey, which included testing within the boundary of the NHL, recorded eight archeological sites and examined six recorded sites within the APE. None of these sites are within the NHL boundary, and none of the investigated sites were considered eligible for listing on the NRHP. The MHT concurred with these determinations on November 26, 2001.

Impacts from Alternative 6 and 7 are generally similar to Alternatives 3 and 5 examined by Fiedel (2000). Minor design changes have been made over the last seven years, including a reconfigured ramp at the proposed New Cut Road interchange; a new Park & Ride lot at the Biggs Ford Road interchange; and a relocated stormwater management pond at the Monocacy Road interchange. Numerous additional stormwater management pond locations will be determined for the project in the future.

No further archeological investigations are recommended for Alternatives 6 and 7 at this time, because the APE was previously examined by Fiedel (2000). Additional archeological work will likely be required in the future as design details are developed. After design issues are resolved and the number of alternatives is reduced, SHA plans to resume negotiations with MHT and the NPS to begin to develop a Memorandum of Agreement stipulating that SHA shall undertake additional archeological identification of high potential areas not covered by our previous survey, together with evaluation and mitigation work, as warranted. In our November 8, 2007 meeting, previous suggestions for minimizing impacts to potential undiscovered archeological resources within the NHL boundary were summarized. SHA will continue coordination with MHT and the NHL to minimize all impacts to the Monocacy Battlefield NHL to the maximum extent possible.

Attachment 4 provides the results of the archeological assessment indicating the areas that will require supplemental archeological identification studies for current design impacts. A number of these areas are identified in SHA's September 5, 2001 letter to MHT, while other locations reflect more recent design modifications. Additional work will also likely be needed for stormwater management pond locations that have not yet been identified, and SHA will closely monitor the project design within the NHL boundaries for possible impacts to archeological resources.

Review Request

Please examine the attached maps, plans, and Effects Table. We request your concurrence by February 17, 2008 that there would be adverse effects on historic

properties by FR192B11, the I-270/ US 15 Multi-Modal Study. Pursuant to the requirements of the implementing regulations in 36 CFR Part 800, SHA seeks your assistance in identifying historic preservation issues related to this project (see 36 CFR §§800.2(c)(4) and (6), and 800.3(f) for information on consulting parties, and §§800.4 and 800.5 for identification of historic properties and assessment of effects). For additional information regarding the Section 106 regulations, see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact the Maryland State Highway Administration or the Maryland Historical Trust. If no response is received by February 17, 2008, we will assume that the Monocacy National Battlefield declines to participate. Please call Ms. Anne E. Bruder at 410-545-8559 (or via email at abruder@sha.state.md.us) with questions regarding standing structures for this project. Mr. Richard Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archeology.

Very truly yours,

Bruce M. Grey
Deputy Director
Office of Planning and
Preliminary Engineering

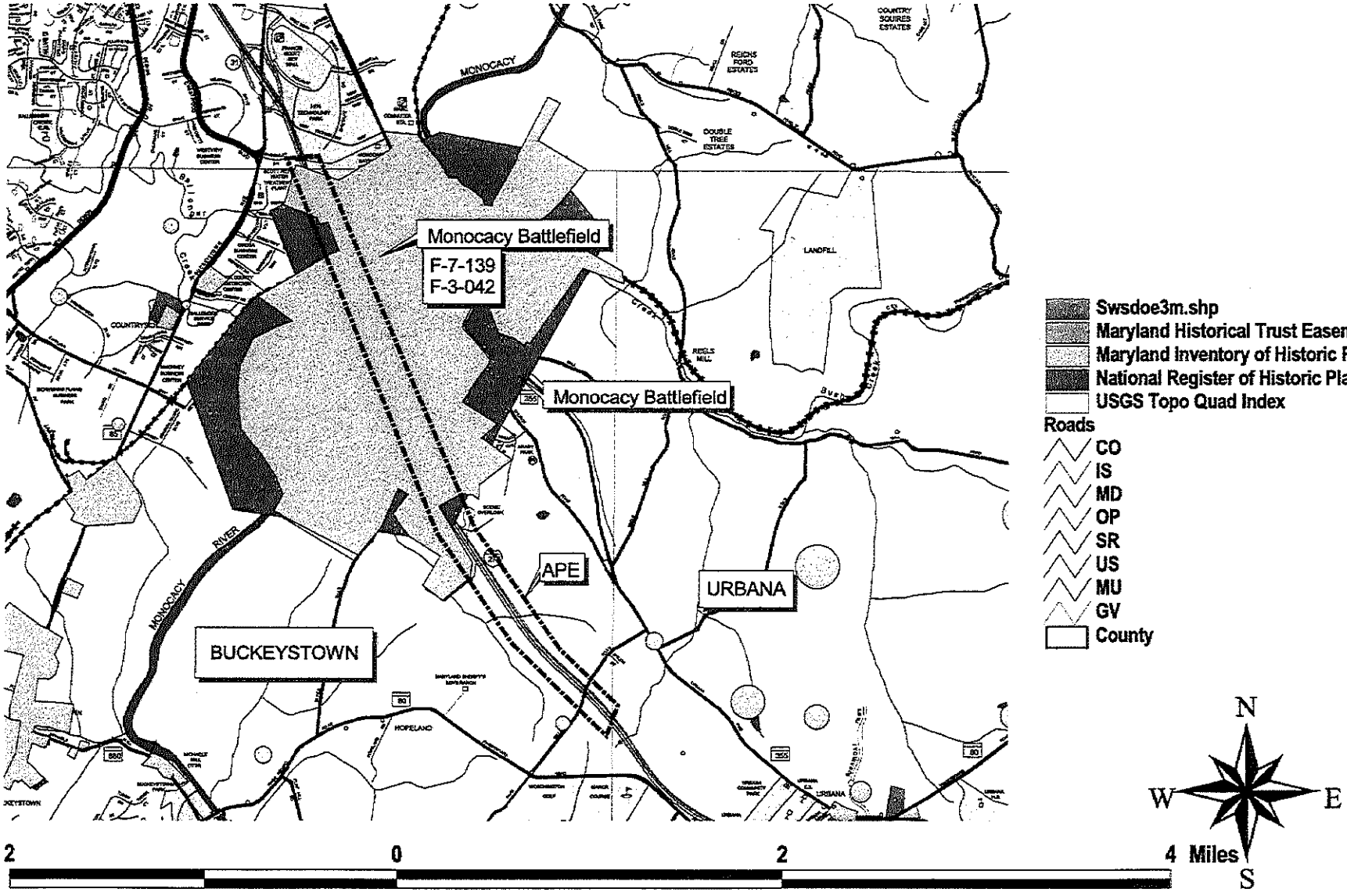
by: for Julie S. Schablitsky
Cultural Resources Team Leader
Project Planning Division

Attachments:
1) SHA's January 10, 2008 letter to the MD SHPO
2) Project Plans
3) Area of Potential Effects Map
4) Archeology Table

cc: Ms. Anne E. Bruder, SHA-PPD (w/Attachments 1-5)
Ms. Janet Davis, Frederick County Historic Preservation Commission
Ms. Anne Elrays, SHA-PPD
Mr. Richard Ervin, SHA-PPD
Mr. Dan W. Johnson, FHWA
Mr. Don Klima/Ms. Carol Legard, ACHP (w/Attachments)
Mr. Joseph Kresslein, SHA-OPPE
Ms. Marie Rust, National Park Service, NHL Program Director (w/Attachments)
Dr. Julie Schablitsky, SHA-PPD
Mr. Russell Walto, SHA-PPD (w/Attachments)

ATTACHMENT 3

I-270/US 15 Multi-Modal Study
SHA Project No. FR192B11
APE Map



Martin O'Malley, *Governor*
Anthony Brown, *Lt. Governor*

SHA Driven to Excel
State Highway Administration
Maryland Department of Transportation

John D. Porcari, *Secretary Designate*
Neil J. Pedersen, *Administrator*

March 18, 2008

Re: Project No. FR192B11
I-270/US 15 Multi-Modal Study
Frederick and Montgomery Counties, Maryland
USGS *Rockville, Gaithersburg, Germantown, Urbana* and *Frederick* 7.5' Quadrangle

CERTIFIED—RETURN RECEIPT REQUESTED

Mr. Joe Lawler
Regional Director
National Capital Region
1100 Ohio Drive, S.W.
Washington DC 20242

Attn.: Ms. Susan Hinton
Regional Transportation Liaison

Dear Mr. Lawler:

Introduction and Project Description

This letter serves to provide the National Park Service with copies of the letters the Maryland State Highway Administration (SHA) sent to the Maryland State Historic Preservation Officer (MD SHPO) as well as the Superintendent of the Monocacy National Battlefield (MNB) and the Philadelphia Regional Office of the National Historic Landmarks Office (NHL) (**Attachments 1, 2** and **3**). SHA is currently preparing an Environmental Assessment for Project No. FR192B11, I-270/US 15 Multi-Modal Study, following a hiatus of the project since the 2002 Draft Environmental Impact Statement. We prepared these letters pursuant to the requirements of 36 CFR Part 800. Ms. Susan Trail, Superintendent of the MNB, requested that we provide your office with copies regarding the adverse impact of SHA's proposed I-270 project on the National Historic Landmark.

SHA has not received comments from the MD SHPO, the MNB or the NHL Office, although we understand that the MNB has prepared a response to SHA. Please advise if your office will provide a separate response from MNB.

Review Request

Please examine the attached correspondence, map (**Attachment** 4), and plans (**Attachment 5**). We request your concurrence by April 20, 2008 that there would be adverse effects on historic properties, including the Monocacy National Battlefield by the widening of I-270 and US 15 from south of Shady Grove Road to north of Biggs Ford Road in Montgomery and Frederick Counties, Maryland. Pursuant to the requirement of the implementing regulations found at 36 CFR Part 800, SHA seeks your assistance in identifying historic preservation issues as they relate to this specific project (see 36 CFR §800.2(c)(4) and (6), and §800.3(f) for information regarding the identification and participation of consulting parties, and §800.4, and §800.5 regarding the identification of historic properties and assessment of effects). For additional information regarding the Section 106 regulations, see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact the Maryland State Highway Administration or the Maryland Historical Trust). If no response is received by April 20, 2008, we will assume that this office declines to participate. Please contact Ms. Anne E. Bruder at 410-545-8559 (or via email at abruder@sha.state.md.us) with questions regarding standing structures for this project. Mr. Richard G. Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archeology.

Very truly yours,

Bruce M. Grey
Deputy Director
Office of Planning and
Preliminary Engineering

by: for Julie M. Schablitsky
Cultural Resources Team Leader
Project Planning Division

Attachments:
1) SHA January 10, 2008 Letter to MD SHPO
2) SHA January 17, 2008 Letter to MNB
3) SHA January 17, 2008 Letter to NHL Philadelphia Office
4) Area of Potential Effects Map
5) Project Plans

cc: Ms. Anne E. Bruder, SHA-PPD (w/Attachments)
Ms. Elizabeth J. Cole/Mr. Tim Tamburrino, MHT
Ms. Anne Elrays, SHA-PPD
Mr. Richard G. Ervin, SHA-PPD
Mr. Brian Horn, SHA-PPD
Mr. Dan W. Johnson, FHWA
Dr. Julie M. Schablitsky, SHA-PPD
Mr. Donald H Sparklin, SHA-PPD
Ms. Susan Trail, Superintendent, Monocacy National Battlefield

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

L1417 (NCR-LRP)

APR 18 2008

Mr. Bruce M. Grey
Deputy Director
Office of Planning and Preliminary Engineering
Maryland State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

Dear Mr. Grey:

Subject: I-270 Multi-Modal Study

We are responding to your January 17, 2008, letter informing Monocacy National Battlefield of the Maryland State Highway Administration's finding that the proposed I-270/US15 Multi-Modal Study constitutes an adverse effect on the battlefield. We concur in this determination of adverse effect. In its analysis of the adverse effects, the letter focuses on adverse impacts from the physical taking and probable destruction of battlefield property and increased noise levels. We also would like to add that the proposed widening will diminish the integrity of the battlefield's historic landscape, including its setting, feeling and association, and that this needs to be taken into account during any discussions of potential mitigation actions.

In addition, your letter does not include proposed improvements to the Rt. 85 interchange as a potential adverse effect on Monocacy National Battlefield. It is my understanding that this project has been included as part of the I-270/US15 Multi-Modal Study and that it might include the physical taking of land on the historic Best Farm and the creation of visual intrusions. As a result, we would suggest including the proposed Rt. 85 interchange improvements as part of the determination of adverse effect. We suggest mitigation for this portion of the project to include shifting any widening that results from the interchange improvements away from the battlefield and not adding any new visual intrusions to the historic Best Farm.

I would like to point out that your January 17, 2008, letter states that Alternatives 3 through 7 "will require widening of I-270 by four lanes in each direction." This is not the case in the draft Environmental Impact Statement, as both Alternatives 3 and 4 presently call for one additional lane in each direction. The National Park Service has been, and continues to be, in favor of increasing the footprint of the existing road no wider than one lane in each direction through the battlefield.

The consultation and coordination meetings conducted to date between the National Park Service and the Maryland State Highway Administration to minimize impacts to Monocacy National Battlefield have been very productive and have resulted in a number of ideas that we would like to see carried forward and included in discussions leading to a Memorandum of Agreement. These include:

TAKE PRIDE IN AMERICA

1. Reducing the impact of traffic noise through road surfaces, sound barriers (hard or vegetative) where appropriate and reduction in speed limits. The goal is to create/maintain as contemplative environment as possible.

2. Preserving/enhancing historic viewsheds; possible measures include depressing the interstate; buffer plantings that hide interstate and traffic, but do not obscure significant viewsheds; contour grading; and enhancing viewsheds by selectively removing existing buffers that presently obscure significant views.

3. Preserving battlefield lands by minimizing the width of new roadway, which can include retaining walls and steeper shoulder slopes and shifting the roadway alignment to the south along previously disturbed ground. In addition, replace any park land lost due to ROW acquisition with an equivalent amount of land inside the park boundary but not under federal ownership.

4. Reducing impacts from exotic/invasive vegetation within the I-270 corridor. This would include removing exotic/invasive vegetation and replacing with native screening where required, and preparing and implementing a plan to maintain the corridor and preventing the return of exotic/invasive vegetation.

5. Reconnecting the two halves of the battlefield bisected by I-270. This would include a physical connection via a deck or bridge, visual connections through potential vista clearings, and cognitively through interpretive information such as signs along I-270 marking the boundaries of the national battlefield.

6. Assist with implementation of selected recommendations in the preferred alternative of Monocacy National Battlefield's draft General Management Plan, including:

    - Improving visitor circulation by constructing trails, such as along the historic road trace connecting the Thomas and Worthington farms; and
    - Reestablishing significant landscape features degraded by modern intrusions such as I-270, including removing the borrow pit on the Worthington Farm side of the interstate and restoring the historic agricultural field, restoring the fence line between the Worthington and Thomas farms, and reestablishing the presently overgrown field above the Monocacy River on the Thomas Farm side of the interstate.

At previous meetings we have discussed the possibility of forming a design review working group to address these issues. As part of the mitigation process, we would like to move ahead with the creation of this group.

We request that the State Highway Administration invite the following to serve as consulting parties on the Section 106 consultation for the I-270 project:

- O. James Lighthizer, President, Civil War Preservation Trust 1331 H Street, N.W., Suite 1001, Washington, D.C. 20005, (202) 367-1861

- Elizabeth Scott Shatto, Coordinator, Frederick Historic Sites Consortium, 19 East Church Street, Frederick, Maryland 21701, (301) 600-4042

- Paul Hawke, Chief, American Battlefield Protection Program, 1201 Eye Street, N.W., (2255), Washington, D.C. 20005, (202) 354-2023

Given Monocacy National Battlefield's status as a National Historic Landmark, we also want to ensure that the National Historic Landmark program and the Advisory Council on Historic Preservation become involved in this process at an early stage.

We appreciate the opportunity to review and comment on this study. If you have any questions or concerns about our comments, please contact Superintendent Susan Trail, Monocacy National Battlefield at (301) 694-3147.

Sincerely,

Regional Director, National Capital Region

cc:
Susan Trail, NPS, Superintendent, Monocacy National Battlefield
Bill Bolger, NPS, National Historic Landmark Program
Paul Hawke, NPS, American Battlefield Protection Program
Anne Bruder, Architectural Historian, Maryland State Highway Administration
Janet Davis, Frederick County Historic Preservation Commission
Brian Horn, Project Manager, Rummel, Klepper & Kahl, LLP
Daniel Johnson, Environmental Program, Federal Highway Administration
Don Klima, Advisory Council on Historic Preservation
O. James Lighthizer, President, Civil War Preservation Trust
J. Rodney Little, State Historic Preservation Officer, Maryland Historical Trust
Ms. Elizabeth Scott Shatto, Coordinator, Frederick Historic Sites Consortium

February 1st 2008

Re: Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Frederick County, Maryland
Schifferstadt Architectural Museum
1110 Rosemont Ave.
Frederick, MD 21701

Mr. Bruce M. Grey
Deputy Director
Office of Planning and Preliminary Engineering
707 North Calvert Street
Baltimore, Maryland 21202

Dear Mr. Bruce M. Grey:

In regards to the proposed project FR192B11, the following adverse effects to the Schifferstadt Architectural Museum (Schifferstadt) concern the Frederick County Landmarks Foundation (FCLF) as owner of the property and operator of the museum.

First, there is a substantial discrepancy of information in the letter of January 10th 2008 addressed to Mr. Rodney Little and attachment 3 of the I-270/US 15 Multi-Modal. The letter states in the second paragraph on page four that "SHA anticipates taking 0.9 acres from within the preservation easement boundary." Attachment 3, fourth paragraph of the fifth page, states that "the widening will require a 0.09 acre take from Schifferstadt within the historic boundary and preservation easement boundary." In this letter, we assume the correct amount of the loss is 0.09 acres. We reserve the right to amend this letter if the actual taking will amount to .9 acres. Either the letter or the materials need to reflect the proper loss of acreage.

The loss of acreage of .09 acres from the Schifferstadt property removes approximately 1/15 of total property acreage. The significance of the impact is substantial. The quality of outdoor activities, including educational events and colonial celebrations, will be affected adversely. We have little enough space to meet the goals and mission of this museum, so any encroachment on this limited property makes a big difference in our ability to operate effectively.

Our additional concerns include, but are not limited to the following:

Substantial proposed changes in the use and character of the SHA easement along Route 15, along with .09 additional acres, resulting in:

- Changes to the drainage pattern to the detriment of the Schifferstadt property including the buildings, heritage garden, heritage orchard, established trees, etc.
    - Currently, the Schifferstadt property relies on a drainage ditch that lies within the SHA easement and which apparently, would be filled in and inaccessible to water draining from the Schifferstadt property according to this plan.

- Increase in noise levels, currently estimated by SHA as noise level increase of 2 dBA, from 66 to 68 dBA.
    - This increase in sound pollution will impact the site adversely, by disrupting outdoor programs and activities, including musical festivities, historical demonstrations and educational programs.

- Damage due to construction work in this confined space that
    - will likely harm the heritage garden, heritage orchard, established trees and other plants;
    - will likely ruin the grading and landscaping overall.

- Construction of a 7-foot retaining wall.
    - If this is built it must meet the National Trust of Historic Preservation's historic requirements.
    - Appropriate vegetation with guaranteed growth must replace current vegetation, which would be removed by the Rt. 15 expansion and attendant construction.

FCLF is also concerned that other alternatives to the proposed plan have not been seriously considered, especially alternatives that do not impact Schifferstadt and the adjacent park as severely as the proposed plan. For example, a "no build" option would have no adverse impact on Schifferstadt; an option that concentrates the construction in this area to the West side of Route 15 would have less impact on Schifferstadt; the impact of the planned Monocacy Blvd. Bypass may make this expansion unnecessary, resulting in no adverse impact on Schifferstadt.

In summary, FCLF is against the proposed expansion of Route 15 as described in project FR192B11. Should the project be undertaken, at a minimum, the above-listed adverse impacts to Schifferstadt must be addressed, and all possible steps must be taken to minimize and compensate for any adverse impacts identified or not identified in this letter.

We look forward to continuing to participate in this process.

Sincerely,

Dean Fitzgerald
President
The Frederick County Landmarks Foundation

by: Joanne Ivancic

Joanne Ivancic
Executive Director
The Frederick County Landmarks Foundation

Martin O'Malley, *Governor*
Anthony G. Brown, *Lt. Governor*

SHA State Highway Administration

John D. Porcari, *Secretary*
Neil J. Pedersen, *Administrator*

Maryland Department of Transportation

February 25, 2008

Re: Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Montgomery and Frederick Counties, Maryland
USGS *Rockville, Gaithersburg, Germantown, Urbana* and *Frederick* 7.5' Quadrangles

Ms. Joanne Ivancic
Executive Director
The Frederick County Landmarks Foundation
49 S. Carroll Street
Frederick MD 21701

Dear Ms. Ivancic:

Thank you for your letter regarding the I-270/US 15 Multi-Modal Corridor Study. We appreciate your comments and concerns regarding the Schifferstadt Architectural Museum. This project is a jointly sponsored effort by the Maryland State Highway Administration (SHA) and the Maryland Transit Administration (MTA) investigating potential upgrades along I-270 and US 15.

As noted in your letter there was a discrepancy in the January 10, 2008 letter to the Maryland Historical Trust regarding the anticipated right-of-way needed within the preservation easement boundary on the Schifferstadt property. The correct figure is 0.09 acres. We apologize for the clerical error. This acreage is required for the proposed widening of US 15 to help relieve the severe congestion experienced throughout the I-270/US 15 corridor.

SHA has also noted your comments and concerns regarding drainage, noise impacts, construction impacts, and the proposed retaining wall. As the study proceeds, SHA will continue to look at ways to reduce or eliminate impacts to all properties along the corridor. SHA is dedicated to preserving valuable cultural resources such as Schifferstadt and is amenable to meeting with the Frederick County Landmarks Foundation.

At the present time, the I-270/US 15 Multi-Modal Corridor Study is only funded for project planning. The project team is conducting environmental impact studies along with evaluating engineering design options as part of this planning process. Before the project can move forward beyond planning, funding will need to become available for Final Design, Right-of-Way Acquisition and then Construction.

Thank you, again, for your correspondence. If you have any further questions or concerns regarding the I-270/US 15 Multi-Modal Corridor Study, please do not hesitate to contact Mr. Brian Horn, SHA Project Manager, toll-free 1-800-548-5026 or via email at bhorn@sha.state.md.us.

Very truly yours,

Anne Elrays

Anne Elrays
Environmental Manager
Project Planning Division

cc: Mr. J. Rodney Little, Maryland State Historic Preservation Officer
Ms. Emily Paulus, Historic Preservation Planner, Frederick City Historic District Commission

bcc: Ms. Anne Bruder, Architectural Historian, SHA Cultural Resources
Ms. Anne Elrays, Environmental Manager, SHA Project Planning Division
Mr. Richard Ervin, Archeologist, SHA Cultural Resources
Dr. Julie Schablitsky, Team Leader, SHA Cultural Resources
Mr. Donald Sparklin, Deputy Division Chief, SHA Project Planning

HISTORIC PRESERVATION COMMISSION
DIVISION OF PLANNING
FREDERICK COUNTY, MARYLAND

Winchester Hall 12 East Church Street Frederick, Maryland 21701 (301) 600-2958

February 7, 2008

Mr. Bruce M. Grey, Deputy Director
Office of Planning & Preliminary Engineering
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

Re: Project No. FR192B11: I-270/US 15 Multi-Modal Study
Montgomery and Frederick Counties, Maryland

Dear Mr. Grey:

The Frederick County Historic Preservation Commission considered at its regular meeting on Feb. 6, 2008, the request for concurrence that historic properties in the subject project area would be adversely affected by the project. By unanimous vote, the Commission concurred with SHA's determination of adverse effect.

The Commission looks forward to continued coordination opportunities on the Multi-Modal project as it progresses.

If you have questions about this concurrence, please contact me by email at jdavis@fredco-md.net or by phone at 301-600-2958.

Sincerely yours,

Janet L. Davis

Janet L. Davis
Historic Preservation Planner

Cc: J. Rodney Little, State Historic Preservation Officer
G. Bernard Callan, Jr., Chair, Historic Preservation Commission

William J. Holtzinger
Mayor

THE City OF Frederick

Aldermen
Marcia A. Hall
President Pro Tem
David "Kip" Koontz
Alan E. Imhoff
C. Paul Smith
Donna Kuzemchak Ramsburg

8 February 2008

Bruce M. Grey
Deputy Director
Office of Planning and Preliminary Engineering
Maryland State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: Section 106 review of I-270/US 15 Multi-Modal Corridor Study

Dear Mr. Grey:

Thank you for inviting the Frederick Historic Preservation Commission (HPC) to join in consultation pursuant to Section 106 of the National Historic Preservation Act, as amended, for the I-270/US 15 Multi-Modal Corridor Study. Upon review of the submitted information, the HPC can concur with SHA's determination that there would be adverse effects to historic resources in the City of Frederick, including Schifferstadt, Rose Hill Manor, Spring Bank, and Harmony Grove Union Chapel. While cognizant that the proposed sound walls are part of the project's long term scope of work, they are of particular concern to the HPC because of their potential adverse effects to the setting of Schifferstadt. We would appreciate additional information regarding the location of the walls in relation to all identified historic resources within the Area of Potential Effects (APE), in addition to any information on associated light impacts, at the appropriate time. The HPC can not make an informed comment on the appropriateness of the APE or the identification of historic properties at this time.

We look forward to providing comments and participating in the Section 106 review process as the project progresses. Please contact Emily Paulus, Preservation Planner, at 301-600-1831 (or via email at epaulus@cityoffrederick.com) with any questions or to provide us with additional information.

Sincerely,

Michael Spencer, Chairman
City of Frederick Historic Preservation Commission

cc: Emily Paulus, Preservation Planner, City of Frederick
Tim Davis, Transportation Planner, City of Frederick
Janet Davis, Historic Preservation Planner, Frederick County, Maryland

PARKS AND RECREATION DIVISION
FREDERICK COUNTY, MARYLAND

118 North Market Street • Frederick, Maryland 21701
301-600-1646 • Fax: 301-600-2595 • TTY: Use Maryland Relay
www.co.frederick.md.us

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Ronald A. Hart

DIVISION DIRECTOR

Paul Dial

February 19, 2008

Mr. Bruce M. Grey
Deputy Director
Office of Planning and Preliminary Engineering
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

Dear Mr. Grey:

The Frederick County Division of Parks and Recreation (FCDPR) appreciate the opportunity to comment on the proposed recommendations for the Project No. FR192B11 I-270/US 15 Multi Modal Study of Frederick County and in particular the projects impacts on Rose Hill Manor Park (F-3-126). Our comments are listed below.

The Area of Potential Effects

We agree that Alternatives 3A/3B, 4A/4B, 5A/5B, 6A/6B and 7A/7B would have lasting adverse effects on the historical integrity, view shed and sound levels at Rose Hill Manor Park. According to the maps provided, the setback or the SHA easement would place the boundary within approximately 50 feet of an exhibit building and 150 feet of the park shop/office currently on the property.

National Register Boundary

This assessment unfortunately was limited to the adverse effects within the current National Register boundary that due to the age and misinformation has several inaccuracies concerning the listed boundary and sites within the actual boundary of the park. Currently the FCDPR are working with Cultural Resources Inc. to amend the National Register form and correct, update and expand the information that was originally provided in 1969. The division foresees that this amendment will be submitted within the next two to three months to the Maryland Historical Trust for review. It is the view of FCDPR that SHA consult with the Maryland Historical Trust after the review of this amendment and make necessary changes and recommendations at that time.

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Additional Significant Archaeological Resources

Through the process of researching information for the National Register amendment, another possible site dating to the 1740's was discovered to be located at the Northwestern corner of the property. This may be the location of the homestead of the German immigrants who purchased the property in 1746. As well we know from records that this complex became a quartering during the occupation of the land by the Grahame family in the 1790-1820's. In a letter dated April 4, 2000 from John Milner and associates, related to excavations this company performed in association with the SHA, an artifact inventory listed several ceramics recovered in the vicinity of this northwestern portion of the area. Due to the recent discovery of this information and the possible association with early settlement and enslaved African occupation, as well as the width of disturbance in this area, FCDPR feels that SHA should conduct a supplemental archaeological survey in this area.

Decibel Impact

It should be noted that Park buildings are used for educational purposes. Classes are held in the various Park buildings along with historic displays replicating the nineteenth century. Currently one of the exhibit buildings is unusable for classes due to noise constraints. In addition, indoor and outdoor classes and/or festivals are extremely difficult to conduct due to the current volume of traffic noise, which according to the estimates, are already at an unacceptable level. Though the building is not a historic structure, this facility houses museum exhibits that are period and should receive special consideration by the SHA. According to the map, this structure will be 50 feet from the ROW boundary. Levels were estimated for 72-75 decibels by 2030, however it is likely that this building along with the log cabin which sits directly to the east of the aforementioned building, will reach much higher decibel levels than anticipated due to their proximity to the proposed highway alignment.

The FCDPR feels further consideration should be given to erecting a sound wall that could mitigate the sound impacts to these buildings. Because of the proposed proximity, there are few if any natural methods for mitigating the sound volume. We are concerned with the SHA determination that this wall is not a cost effective solution, and would like to receive more detailed information on the proposed alternatives the State Highway has in mind that they deem "Cost Effective".

Visual Aesthetics Impact

SHA's workshop pamphlet encouraged "Thinking Beyond the Pavement" in order to reflect the local character and the aesthetic desires of the community. As well, the National Scenic By-Way designation of US 15 along with initiatives such as 15 on 15, and the Journey through Hallowed Ground promote the unique visual character of this highway. The FCDPR is responsible for protecting the sensitive nature of preserving the historic integrity of the Rose Hill Manor historic structures and surrounding park property. The FCDPR believes it would be in SHA's best interest to make every possible consideration in how to protect the visual integrity of this Maryland historic treasure that provides a scenic view-shed along the by-way in the heart of Frederick City and County.

FCDPR has commented on these issues many times over the course of the last seven years and would like to work toward a resolution that will keep a high level of preservation, appropriate appearance, comfort and pleasant experience for our park users. Please be aware that visitors of Rose Hill Manor include Frederick County residents, and regional, national and international visitors as well. Thank you for your time and consideration in addressing FCDPR comments. Please feel free to contact me at 301-600-1652.

Sincerely,

Paul Dial
Division Director
Frederick County Division of Parks and Recreation

Cc: Jeremy Kortright
Jennifer Roth

GSA

APR 17 2008

GSA National Capital Region

Julie S. Schablitsky
Cultural Resources Team Leader
Project Planning Division
State Highway Administration
Maryland Department of Transportation
707 North Calvert Street
Baltimore, Maryland 21202

Re: Project No. FR192B11
I-270/US 15 Multi-Modal Study
Montgomery and Frederick Counties, Maryland
USGS *Rockville, Gaithersburg, Germantown, Urbana and Frederick* 7.5 Quadrangles

Dear Dr. Schablitsky:

This is in response to your letter of January 10, 2008, requesting comments and inviting participation of the U. S. General Services Administration (GSA) in the Section 106 process for the above-mentioned project. We apologize for this delayed response as the letter took some time to be routed to the appropriate office for response.

GSA's National Capital Region would like to participate in the Section 106 process regarding the Atomic Energy Commission Building complex, located at 19901 Germantown Road, Germantown, Maryland, which is under the custody and control of GSA. Based on a review of the documentation provided, we agree that this property appears to meet the National Register of Historic Places criteria for evaluation and that this proposed project will adversely affect the property.

We look forward to participating in the Section 106 process. I may be reached at beth.savage@gsa.gov or 202.205.2265.

Sincerely,

Beth L. Savage
Regional Historic Preservation Officer
Portfolio Management Division

U.S. General Services Administration
301 7th Street, SW
Washington, DC 20407-0001
www.gsa.gov

Martin O'Malley, *Governor*
Anthony G. Brown, *Lt. Governor*

SHA State Highway Administration

John D. Porcari, *Secretary*
Neil J. Pedersen, *Administrator*

Maryland Department of Transportation

June 20, 2008

Re: Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Montgomery and Frederick Counties,
Maryland
USGS *Rockville, Gaithersburg, and Germantown* 7.5' Quadrangles

Mr. Greg May
Crown Village Farm, LLC
c/o KB Home Mid-Atlantic Division
8219 Leesburg Pike
Suite 300
Vienna VA 22182

Dear Mr. May:

The Maryland State Highway Administration (SHA) plans to improve two highways, I-270 and US 15, in Montgomery County. SHA is also assisting the Maryland Transit Administration (MTA) with the development of the Corridor Cities Transitway (CCT), a light rail or bus rapid transit system. As a result, SHA and MTA have determined that our Project No. FR192B11, I-270/US 15 Multi-Modal Study, will have an adverse effect on standing historic properties, including the England/Crown Farm (MIHP No.M:20-17). The farm was determined to be eligible for inclusion in the National Register of Historic Places on September 24, 1996 by SHA and the Maryland State Historic Preservation Officer (MHT). A copy of the Maryland Inventory of Historic Properties Form with information about the eligibility determination can be found in **Attachment 1.** On January 10, 2008, SHA wrote to MHT about the project's adverse effect, and a copy of the letter is included as **Attachment 2.** SHA and MTA invite you to consult with SHA, MTA, the Federal Highway Administration (FHWA) and the MHT about the adverse impacts on the England/Crown Farm. If you choose to participate in this process as a Consulting Party, you would be able to provide input to SHA about our project, as explained below.

SHA and MTA have incorporated the requirements of the National Historic Preservation Act of 1966, as amended, and the implementing regulations found at 36 CFR Part 800, into the planning for this multi-modal improvement project. The federal historic preservation regulations require SHA and MTA to consult and to consider the views of the historic property owners before making any final decision about the design of the project. Through the consultation, you will assist SHA, MTA, FHWA and MHT in seeking ways to avoid or reduce the project's adverse impact to the England/Crown Farm. For additional information regarding the 36 CFR Part 800 regulations, please see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact the Maryland State Highway Administration or the Maryland Historical Trust. A copy of *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* is also included for your information in **Attachment 3**.

Our research shows that the England/Crown Farm is a 75.80 acre parcel that was formerly in agricultural and dairying production in Gaithersburg. Construction of the historic farm began in the early nineteenth century with the building of a log dwelling. The building campaign continued throughout the nineteenth and early twentieth centuries. The second dwelling is a cross gable I-house that is five bays wide. The hipped roof front porch is decorated with sawn scrollwork and the roof is supported by square porch supports, which demonstrates the Stick style of construction. Twentieth century barns and other outbuildings exemplify the small-scale dairying that occurred on the farm. The changing housing needs of the England and Crown families are demonstrated first by the use of the one-room log house and then the move to the more stylish I-house. England/Crown Farm is eligible for listing in the NRHP under Criteria A (Montgomery County dairying) and C (architecture). The land within the tax parcel is the England/Crown Farm's setting.

SHA and MTA are studying five alternatives for the CCT, but all alternatives follow the same design within the England/Crown Farm. We plan to construct a transit station and a hiker-biker trail, as well as the transit way through the historic property. Our planning study calculated that MTA would require 4.11 acres from the historic property for the current design. The physical impacts and right-of-way required for the I-270/US 15 Multi-Modal Study Alternatives 3A/B, 4A/B, 5A/B, 6A/B and 7A/B meet the criteria of 36 CFR §800.5, and will have an adverse impact on the England/Crown Farm. Project plans are included as **Attachment 3**.

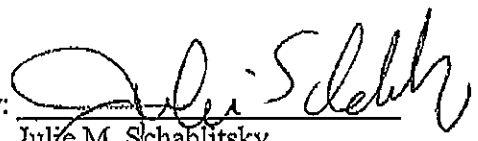
SHA anticipates that we will hold meetings, communicate by telephone, as well as correspond by letter and email, to further discuss this project's impacts on the historic property. If it is not possible to avoid or reduce the multi-modal project's adverse impact, we will look at ways to mitigate it. SHA has invited the City of Gaithersburg

Historic District Commission and Preservation Montgomery, Inc. to participate in the consultation and to provide additional advice to us.

Thank you for your assistance with this project. We ask that you review this letter and the attachments. If you are willing to participate as a Consulting Party, please provide SHA with a letter stating your agreement to be involved. SHA also requests that you indicate that SHA Project No. FR192B11, the I-270/US 15 Multi-Modal Study, will have an adverse effect on historic properties, including England/Crown Farm. Your involvement in SHA's project as a Consulting Party will not change any of your rights as a property owner. If you have questions regarding standing structures for this project, please feel free to call SHA Senior Architectural Historian Ms. Anne E. Bruder at 410-545-8559 (or via email at abruder@sha.state.md.us). SHA Senior Archeologist Mr. Richard Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archeology. Mr. Russell Anderson, SHA Project Manager, can be reached at 410-545-8839 (or via email at randerson2@sha.state.md.us) with questions regarding the I-270/US 15 Multi-Modal Study.

Very truly yours,

Bruce M. Grey
Deputy Director
Office of Planning and
Preliminary Engineering

by: 
Julie M. Schablitsky
Assistant Division Chief
Project Planning Division

Attachments: 1) MIHP Form
2) January 10, 2008 Adverse Effect Letter
3) ACHP Brochure
4) Project Plans

cc: Mr. Russell Anderson, SHA-PPD (w/Attachments)
Ms. Anne E. Bruder, SHA-PPD (w/Attachments)
Ms. Anne Elrays, SHA-PPD
Mr. Richard Ervin, SHA-PPD
Mr. Wayne Goldstein, Montgomery Preservation, Inc. (w/Attachments)
Mr. Brian Horn/Ms. Helen German, RKK (w/Attachments)
Mr. Daniel Johnson, FHWA
Mr. Rick J. Kiegel, P.E., MTA (w/Attachments)
Mr. Don Klima/Ms. Carol Legard, ACHP (w/Attachments)
Mr. Greg Ossont, Director, Gaithersburg City Planning and Code Administration (w/Attachments)
Dr. Julie M. Schablitsky, SHA-PPD

CROWN VILLAGE FARM, LLC

8219 Leesburg Pike
3rd Floor
Vienna, VA 22182-2625

July 22, 2008

Mr. Bruce Grey, Deputy Director
State Highway Administration
Office of Planning and Preliminary Engineering
707 N. Calvert Street, MS C-301
Baltimore, MD 21202

Re: Project No. FR192B11
I-270/US 15 Multi-Modal Study
Montgomery and Frederick Counties, Maryland
USGS *Rockville, Gaithersburg and Germantown* 7.5' Quadrangles

Dear Mr. Grey:

Thank you for arranging the meeting with us last Friday at the Crown Farm site. I believe it was a productive meeting and brought all of the attendees up to date with what is being planned for the project, including the proposed alternate alignment of the CCT.

Crown Village Farm, LLC does wish to participate in the process as a Consulting Party. I will be the point of contact for now, but in the future you may need to contact Bob Jansen at 703-663-6520 (bjansen@kbhome.com). In the event you are unable to reach either of us, please contact Gary Unterberg at Rodgers Consulting (301-948-4700 or GUnterberg@RODGERS.com), one of our consultants on the project.

Please feel free to contact me at 703-663-6518 if you have any questions.

Very truly yours,

CROWN VILLAGE FARM, LLC

Gregory C. May, P.E.
Crown Village Farm, LLC
c/o KB Home Mid Atlantic Division

cc: Bob Jansen
Gary Unterberg, Rodgers Consulting

Martin O'Malley, *Governor*
Anthony G. Brown, *Lt. Governor*

SHA State Highway Administration

John D. Porcari, *Secretary*
Neil J. Pedersen, *Administrator*

Maryland Department of Transportation

June 20, 2008

Re: Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Montgomery and Frederick Counties,
Maryland
USGS *Frederick* 7.5' Quadrangle

Mr. and Mrs. Gary J. Thatcher
7801 Biggs Ford Road
Frederick MD 21701

Dear Mr. and Mrs. Thatcher:

The Maryland State Highway Administration (SHA) plans to improve two highways, I-270 and US 15, in Frederick County. As a result, we have determined that our Project No. FR192B11, I-270/US 15 Multi-Modal Study, will have an adverse effect on standing historic properties, including the Birely-Roelkey Farmstead (MIHP No. F-3-134). Your farm was determined to be eligible for inclusion in the National Register of Historic Places on October 2, 1996 by SHA and the Maryland State Historic Preservation Officer (MHT). A copy of the Maryland Inventory of Historic Properties Form with information about the eligibility determination can be found in **Attachment 1**. On January 10, 2008, SHA wrote to MHT about the project's adverse effect, and a copy of the letter is included as **Attachment 2**. SHA invites you to consult with SHA, the Federal Highway Administration (FHWA) and the MHT about the adverse impacts on the Birely-Roelkey Farmstead. If you choose to participate in this process as a Consulting Party, you would be able to provide input to SHA about our project, as explained below.

SHA has incorporated the requirements of the National Historic Preservation Act of 1966, as amended, and the implementing regulations found at 36 CFR Part 800, into the planning for this highway improvement project. The federal historic preservation regulations require SHA to consult and to consider the views of the historic property owners before making any final decision about the design of the project. Through the consultation, you will assist SHA, FHWA and MHT in seeking ways to avoid or reduce the project's adverse impact to the Bireley-Roelkey Farmstead. For additional

information regarding the 36 CFR Part 800 regulations, please see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact the Maryland State Highway Administration or the Maryland Historical Trust. A copy of *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* is also included for your information in **Attachment 3.**

Our research shows that the Birely-Roelkey Farmstead is a 114 acre parcel in active agricultural production. It is located north of Frederick and was built about 1851 by John Birely, a prominent local businessman. The farm is an important link to the agrarian tradition of Frederick County and the brick dwelling is an example of the Italianate architectural style. Birely-Roelkey Farmstead is eligible for listing in the NRHP under Criterion C (architecture). The land within the tax parcel is the Birely-Roelkey Farmstead's setting.

SHA is studying five alternatives for improving. US 15, but all alternatives follow the same design near Birely-Roelkey Farmstead. We plan to widen US 15 to three lanes in each direction and create an interchange between US 15 and Biggs Ford Road. Our planning study calculated that SHA would require 13.46 acres from the historic property for the current design. The physical impacts and right-of-way required for the I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7 meet the criteria of 36 CFR §800.5, and will have an adverse effect on the Birely-Roelkey Farmstead. Project plans are included as **Attachment 4.**

SHA anticipates that we will hold meetings, communicate by telephone, as well as correspond by letter and email, to further discuss this project's impacts on the historic property. If it is not possible to avoid or reduce the highway project's adverse impact, we will look at ways to mitigate it. SHA has invited the Frederick County Historic Preservation Commission to participate in the consultation and to provide additional advice to us.

Thank you for your assistance with this project. We ask that you review this letter and the attachments. If you are willing to participate as a Consulting Party, please provide SHA with a letter stating your agreement to be involved. SHA also requests that you indicate that SHA Project No. FR192B11, the I-270/US 15 Multi-Modal Study, will

have an adverse effect on historic properties, including Birely-Roelkey Farmstead. Your involvement in SHA's project as a Consulting Party will not change any of your rights as a property owner. If you have questions regarding standing structures for this project, please feel free to call SHA Senior Architectural Historian Ms. Anne E. Bruder at 410-545-8559 (or via email at abruder@sha.state.md.us). SHA Senior Archeologist Mr. Richard Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archeology. Mr. Russell Anderson, SHA Project Manager, can be reached at 410-545-8839 (or via email at randerson2@sha.state.md.us) with questions regarding the I-270/US 15 Multi-Modal Study.

Very truly yours,

Bruce M. Grey
Deputy Director
Office of Planning and
Preliminary Engineering

by: _____
Julie M. Schablitsky
Assistant Division Chief
Project Planning Division

Attachments: 1) MIHP Form
2) January 10, 2008 Adverse Effect Letter
3) ACHP Brochure
4) Project Plans

cc: Mr. Russell Anderson, SHA-PPD (w/Attachments)
Ms. Anne E. Bruder, SHA-PPD (w/Attachments)
Ms. Beth Cole/Mr. Tim Tamburrino, MHT
Ms. Janet Davis, Frederick County Historic Preservation Commission (w/Attachments)
Ms. Anne Elrays, SHA-PPD
Mr. Richard Ervin, SHA-PPD
Mr. Brian Horn/Ms. Helen German, RKK (w/Attachments)
Mr. Daniel Johnson, FHWA
Mr. Rick J. Kiegel, P.E., MTA (w/Attachments)
Mr. Don Klima/Ms. Carol Legard, ACHP (w/Attachments)
Dr. Julie M. Schablitsky, SHA-PPD

Martin O'Malley, *Governor*
Anthony G. Brown, *Lt. Governor*

SHA State Highway Administration

John D. Porcari, *Secretary*
Neil J. Pedersen, *Administrator*

Maryland Department of Transportation

June 20, 2008

Re: Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Montgomery and Frederick Counties, Maryland
USGS *Rockville* 7.5' Quadrangle

Mr. David M. McDonough
Senior Director
Development Oversight
Johns Hopkins Real Estate
1101 East 33rd Street
Suite E100
Baltimore MD 21218

and

Edward Bernard Justus, Esq.
Associate General Counsel
Johnson Hopkins University
3400 North Charles Street
113 Garland Hall
Baltimore MD 21218

Gentlemen:

The Maryland State Highway Administration (SHA) plans to improve I-270 in Montgomery County. SHA is also assisting the Maryland Transit Administration (MTA) with the development of the Corridor Cities Transitway, a light rail or bus rapid transit system. As a result, SHA and MTA have determined that our Project No. FR192B11, I-270/US 15 Multi-Modal Study, will have an adverse effect on standing historic properties, including the Belward Farm (M:20-21). The farm was determined to be eligible for inclusion in the National Register of Historic Places on September 24, 1996 by SHA and the Maryland State Historic Preservation Officer (MHT). A copy of the Maryland Inventory of Historic Properties Form with information about the eligibility

determination can be found in **Attachment 1**. On January 10, 2008, SHA wrote to MHT about the project's adverse effect, and a copy of the letter is included as **Attachment 2**. SHA invites you to consult with SHA, MTA, the Federal Highway Administration (FHWA) and the MHT about the adverse impacts on the Belward Farm. If you choose to participate in this process as a Consulting Party, you would be able to provide input to SHA and MTA about our project, as explained below.

SHA and MTA have incorporated the requirements of the National Historic Preservation Act of 1966, as amended, and the implementing regulations found at 36 CFR Part 800, into the planning for this highway improvement project. The federal historic preservation regulations require SHA and MTA to consult and to consider the views of the historic property owners before making any final decision about the design of the project. Through the consultation, you will assist SHA, MTA, FHWA and MHT in seeking ways to avoid or reduce the project's adverse impact to the Belward Farm. For additional information regarding the *36 CFR Part 800* regulations, *Protection of Historic Properties*, please see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact the Maryland State Highway Administration or the Maryland Historical Trust. A copy of *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* is also included for your information in **Attachment 3**.

Our research shows that the Belward Farm is a 107 acre parcel that is not in active agricultural production. It is located northwest of Rockville and was built about 1891 by Ignatius Ward, a farmer and storekeeper. The house is a two-story frame L-shaped structure characterized by vernacular Queen Anne style massing and detailing including a two story polygonal bay and a two-story porch. Belward Farm is eligible for listing in the NRHP under Criterion C (architecture). The land within the tax parcel is the Belward Farm's setting.

SHA and MTA are studying five alternatives for the CCT, but all alternatives follow the same design near Belward Farm. We plan to construct a transit stop with a garage and a hiker-biker trail within the eastern boundary of the historic property. Our planning study calculated that MTA would require 0.64 acres from the historic property for the current design. The physical impact and right-of-way required for the I-270/US 15 Multi-Modal Study Alternatives 3A/B, 4A/B, 5A/B/C, 6A/B, and 7A/B meet the criteria of 36 CFR §800.5, and will have an adverse impact on the Belward Farm. Project plans are included as **Attachment 4**.

SHA anticipates that we will hold meetings, communicate by telephone, as well as correspond by letter and email, to further discuss this project's impacts on the historic property. If it is not possible to avoid or reduce the transitway project's adverse impact, we will look at ways to mitigate it. SHA has invited the Montgomery County Historic Preservation Commission and Montgomery Preservation, Inc. to participate in the consultation and to provide additional advice to us.

Thank you for your assistance with this project. We ask that you review this letter and the attachments. If you are willing to participate as a Consulting Party, please provide SHA with a letter stating your agreement to be involved. SHA also requests that you indicate that SHA Project No. FR192B11, the I-270/US 15 Multi-Modal Study, will have an adverse effect on historic properties, including Belward Farm. Your involvement in SHA's project as a Consulting Party will not change any of your rights as a property owner. If you have questions regarding standing structures for this project, please feel free to call SHA Senior Architectural Historian Ms. Anne E. Bruder at 410-545-8559 (or via email at abruder@sha.state.md.us). SHA Senior Archeologist Mr. Richard Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archeology. Mr. Russell Anderson, SHA Project Manager, can be reached at 410-545-8839 (or via email at randerson2@sha.state.md.us) with questions regarding the I-270/US 15 Multi-Modal Study.

Very truly yours,

Bruce M. Grey
Deputy Director
Office of Planning and
Preliminary Engineering

by: _____
Julie M. Schablitsky
Assistant Division Chief
Project Planning Division

Attachments: 1) MIHP Form
2) January 10, 2008 Adverse Effect Letter
3) *ACHP Brochure*
4) Project Plans

cc: Mr. Russell Anderson, SHA-PPD (w/Attachments)
Ms. Anne E. Bruder, SHA-PPD (w/Attachments)
Ms. Beth Cole/Mr. Tim Tamburrino, MHT
Ms. Anne Elrays, SHA-PPD
Mr. Richard Ervin, SHA-PPD
Mr. Wayne Goldstein, Montgomery Preservation, Inc. (w/Attachments)
Mr. Brian Horn/Ms. Helen German, RKK (w/Attachments)
Mr. Daniel Johnson, FHWA
Mr. Rick J. Kiegel, P.E., MTA (w/Attachments)
Mr. Don Klima/Ms. Carol Legard, ACHP (w/Attachments)
Dr. Julie M. Schablitsky, SHA-PPD
Mr. Scott Whipple, Montgomery County Historic Preservation Commission (w/Attachment)

Martin O'Malley, *Governor*
Anthony G. Brown, *Lt. Governor*

SHA State Highway Administration

John D. Porcari, *Secretary*
Neil J. Pedersen, *Administrator*

Maryland Department of Transportation

June 20, 2008

Re: Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Montgomery and Frederick Counties,
Maryland
USGS *Frederick* 7.5' Quadrangle

Spring Bank, L.L.C.
60 Thomas Johnson Drive
Frederick MD 21702

and

Mr. Barry Weiskopf
100 East Pratt Street
26th Floor
Baltimore MD 21202

Dear Sir or Madam:

The Maryland State Highway Administration (SHA) plans to improve two highways, I-270 and US 15, in Frederick County. As a result, we have determined that our Project No. FR192B11, I-270/US 15 Multi-Modal Study, will have an adverse effect on standing historic properties, including Spring Bank (MIHP No. F-3-22). Your historic house was listed in the National Register of Historic Places (NRHP) on September 7, 1984. A copy of the NRHP Nomination Form can be found in **Attachment 1.** On January 10, 2008, SHA wrote to the Maryland Historical Trust (MHT) about the project's adverse effect, and a copy of the letter is included as **Attachment 2.** SHA invites you to consult with SHA, the Federal Highway Administration (FHWA) and the MHT about the adverse impacts on Spring Bank. If you choose to participate in this process as a Consulting Party, you would be able to provide input to SHA about our project, as explained below.

SHA has incorporated the requirements of the National Historic Preservation Act of 1966, as amended, and the implementing regulations found at 36 CFR Part 800,

Protection of Historic Properties, into the planning for this highway improvement project. The federal historic preservation regulations require SHA to consult and to consider the views of the historic property owners before making any final decision about the design of the project. Through the consultation, you will assist SHA, FHWA and MHT in seeking ways to avoid or reduce the project's adverse impact to Spring Bank. For additional information regarding the 36 CFR Part 800 regulations, please see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact the Maryland State Highway Administration or the Maryland Historical Trust. A copy of *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* is also included for your information in **Attachment 3.**

Our research shows that Spring Bank is a 2-1/2 story brick dwelling constructed in 1880 east of the railroad tracks. It was listed in the NRHP under Criterion C (architecture) in 1984 as an excellent example of late nineteenth century domestic architecture. The dwelling retains a two-story gallery, lancet arch windows, a complex, multigabled slate roof and elaborate decorative trim which demonstrate Italianate and Gothic revival influences in the central part of Maryland. The NRHP boundary is 10.41 acres of land surrounding the house, and that is considered to be its historic setting.

SHA is studying five alternatives for improving US 15, but all alternatives follow the same design near Spring Bank. We plan to widen US 15 to three lanes. Our planning study calculated that no right-of-way would be required from the historic property, and no physical impact would occur. However, SHA's noise studies indicate that the current traffic noise levels are 66 decibels (dBA), and by 2030, the traffic noise will rise to 69 dBA. The audible impacts by the I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7 meet the criteria of 36 CFR §800.5, and will have an adverse impact on Spring Bank. Project plans are included as **Attachment 4.**

SHA anticipates that we will hold meetings, communicate by telephone, as well as correspond by letter and email, to further discuss this project's impacts on the historic property. If it is not possible to avoid or reduce the highway project's adverse impact, we will look at ways to mitigate it. SHA has invited the Frederick County Historic Preservation Commission to participate in the consultation and to provide additional advice to us.

Thank you for your assistance with this project. We ask that you review this letter and the attachments. If you are willing to participate as a Consulting Party, please provide SHA with a letter stating your agreement to be involved. SHA also requests that you indicate that SHA Project No. FR192B11, the I-270/US 15 Multi-Modal Study, will

have an adverse effect on historic properties, including Spring Bank. Your involvement in SHA's project as a Consulting Party will not change any of your rights as a property owner. If you have questions regarding standing structures for this project, please feel free to call SHA Senior Architectural Historian Ms. Anne E. Bruder at 410-545-8559 (or via email at abruder@sha.state.md.us). SHA Senior Archeologist Mr. Richard Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archeology. Mr. Russell Anderson, SHA Project Manager, can be reached at 410-545-8839 (or via email at randerson2@sha.state.md.us) with questions regarding the I-270/US 15 Multi-Modal Study.

Very truly yours,

Bruce M. Grey
Deputy Director
Office of Planning and
Preliminary Engineering

by: _____
Julie M. Schablitsky
Assistant Division Chief
Project Planning Division

Attachments: 1) MIHP Form
2) January 10, 2008 Adverse Effect Letter
3) ACHP Brochure
4) Project Plans

cc: Mr. Russell Anderson, SHA-PPD (w/Attachments)
Ms. Anne E. Bruder, SHA-PPD (w/Attachments)
Ms. Beth Cole/Mr. Tim Tamburrino, MHT
Ms. Janet Davis, Frederick County Historic Preservation Commission (w/Attachments)
Ms. Anne Elrays, SHA-PPD
Mr. Richard Ervin, SHA-PPD
Mr. Brian Horn/Ms. Helen German, RKK (w/Attachments)
Mr. Daniel Johnson, FHWA
Mr. Rick J. Kiegel, P.E., MTA (w/Attachments)
Mr. Don Klima/Ms. Carol Legard, ACHP (w/Attachments)
Dr. Julie M. Schablitsky, SHA-PPD

DAN RYAN BUILDERS

July 25, 2008

Ms. Anne E. Bruder, Architectural Historian
Office of Planning & Preliminary Engineering
STATE HIGHWAY ADMINISTRATION
707 North Calvert Street, MS C-301
Baltimore, Maryland 21202

Re: ***Spring Bank Property, Frederick, Maryland***

Dear Ms. Bruder,

Thank you for arranging the meeting that took place July 21 to discuss the noise impact of SHA's improvement to US Route 15 as it pertains to the Spring Bank property. Overall, I thought that the meeting was very productive and valued the discussions and the input by all parties.

It is my understanding that the only adverse effect the road improvements will have on the property is an increase in noise levels. With this letter, I would like to express my reservations regarding the option of building a wall along Route 15, facing the Spring Bank house in an effort to reduce the noise level. I believe such an option will have a negative visual effect on the surroundings and will lower property values of Spring Bank and the adjoining properties.

My preferred option is a berm and landscaping buffer combination as a means for noise reduction. I am aware that this option will not be as effective as a wall; however, it will reduce the noise to an acceptable level. I hope you will take into consideration my concerns and would like to be included if or when a design is proposed for the berm / landscaping buffer.

If I can be of any further assistance or should you require any information please feel free to contact me at 301-696-5502.

Sincerely,

Maher Kilajian
Managing Partner, Spring Bank, LLC

cc: Dr. Julie M. Schablitsky, SHA-PPD
Ms. Beth Cole / Mr. Tim Tamburrino, MHT
Ms. Janet Davis, Frederick Co. Historic Preservation Comm
Mr. Brian Horn/Ms. Helen German, RKK
Dan Ryan, Dan Ryan Builders, Inc.

Martin O'Malley, *Governor*
Anthony G. Brown, *Lt. Governor*

SHA State Highway Administration

John D. Porcari, *Secretary*
Neil J. Pedersen, *Administrator*

Maryland Department of Transportation

June 23, 2008

Re: Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Montgomery and Frederick Counties, Maryland
USGS *Urbana* and *Frederick* 7.5' Quadrangles

Mr. Dean Fitzgerald
President
Frederick County Landmarks Foundation
c/o Fitzgerald's Heavy Timber Construction
10801 Powell Road
Thurmont MD 21788

Dear Mr. Fitzgerald:

The Maryland State Highway Administration (SHA) plans to improve two highways, I-270 and US 15, in Frederick County. As a result, we have determined that our Project No. FR192B11, I-270/US 15 Multi-Modal Study, will have an adverse effect on standing historic properties, including Schifferstadt (MIHP No. F-3-47). Schifferstadt was listed in the National Register of Historic Places (NRHP) on October 22, 1974 by the Maryland State Historic Preservation Officer (MHT). On January 10, 2008, SHA wrote to MHT, and a copy of the letter about the project's adverse effect is included as **Attachment 1**. SHA invites the Frederick County Landmarks Foundation (FCLF) to consult with SHA, the Federal Highway Administration (FHWA) and the MHT about the adverse impacts on Schifferstadt. If FCLF chooses to participate in this process as a Consulting Party, you would be able to provide input to SHA about our project, as explained below.

SHA has incorporated the requirements of the National Historic Preservation Act of 1966, as amended, and the implementing regulations found at 36 CFR Part 800, into the planning for this highway improvement project. The federal historic preservation regulations require SHA to consult and to consider the views of the historic property

owners before making any final decision about the design of the project. Through the consultation, you will assist SHA, FHWA and MHT in seeking ways to avoid or reduce the project's adverse impact to Schifferstadt. For additional information regarding the 36 CFR Part 800 regulations, please see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact the Maryland State Highway Administration or the Maryland Historical Trust. A copy of *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* is also included for your information in **Attachment 2**.

Our research shows that Schifferstadt is a 1.25 acre parcel located in Frederick. Josef Brunner is presumed to have constructed the two-and-one-half story dwelling about 1750. It exemplifies German colonial settlement and building methods in western Maryland during the mid-eighteenth century. Schifferstadt is listed in the NRHP under Criterion C (architecture), and it appears to have statewide significance. The land within the tax parcel is Schifferstadt's setting.

SHA is studying five alternatives for improving US 15, but all alternatives follow the same design near Schifferstadt. We plan to widen US 15 to three lanes in each direction. Our planning study calculated that SHA would require .09 acres from the historic property for the current design. The physical impacts and right-of-way required for the I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7 meet the criteria of 36 CFR §800.5, and will have an adverse impact on Schifferstadt.

SHA also conducted noise tests on June 1, 2006 at 7:28 A.M. and on May 31, 2006, at 5:52 P.M. The A.M. noise level test measured 63 decibels (dBA), while the P.M. noise level test measured 62 dBA. Our noise test models indicate that by 2030, the noise levels will rise to between 67 and 68 dBA. These levels also meet the criteria of Adverse Effect found at 36 CFR §800.5, and will have an adverse effect on Schifferstadt.

SHA also holds the drainage easement at the rear of the historic property. To understand the limits of the drainage easement, SHA proposes to survey and mark the boundary lines. SHA will notify the museum staff prior to conducting the easement boundary survey. Project plans are included as **Attachment 3**.

SHA proposes to investigate the avoidance and minimization options which may reduce the 0.09 acre impact (beyond the SHA Drainage Easement) to Schifferstadt. The potential avoidance or minimization options that could be investigated include reducing shoulder widths, adjusting slopes, constructing full-height retaining walls, short retaining wall using traffic barrier, or toe of slope retaining wall, and reconstructing existing

drainage structures. Shifting the US 15 centerline west (away) from the Schifferstadt property is also a consideration, but it should be noted the shifted highway would impact another Section 4(f) property (Waterford Park) and possibly additional residences along Briggs Avenue (along Southbound US 15). SHA is committed to completing additional engineering studies and will share the information at a future date.

SHA anticipates that we will hold meetings, communicate by telephone, as well as correspond by letter and email, to further discuss this project's impacts on the historic property. If it is not possible to avoid or reduce the highway project's adverse impact, we will look at ways to mitigate it. SHA has invited the Frederick City Historic Preservation Commission to participate in the consultation and to provide additional advice to us.

Thank you for your assistance with this project. We ask that you review this letter and the attachments. If you are willing to participate as a Consulting Party, please provide SHA with a letter stating your agreement to be involved. SHA also requests that you indicate that SHA Project No. FR192B11, the I-270/US 15 Multi-Modal Study, will have an adverse effect on historic properties, including Schifferstadt. Your involvement in SHA's project as a Consulting Party will not change any of your rights as a property owner. If you have questions regarding standing structures for this project, please feel free to call SHA Senior Architectural Historian Ms. Anne E. Bruder at 410-545-8559 (or via email at abruder@sha.state.md.us). SHA Senior Archeologist Mr. Richard Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archeology. Mr. Russell Anderson, SHA Project Manager, can be reached at 410-545-8839 (or via email at randerson2@sha.state.md.us) with questions regarding the I-270/US 15 Multi-Modal Study.

Very truly yours,

Bruce M. Grey
Deputy Director
Office of Planning and
Preliminary Engineering

by: _____
Julie M. Schablitsky
Assistant Division Chief
Project Planning Division

U.S. Department of Transportation
Federal Highway Administration

DELMAR Division - Maryland

10 S. Howard St., Suite 2450
Baltimore, Maryland 21201

July 11, 2008

In Reply Refer To: HDA-MD

Ms. Marie Rust
NHL Program Director
National Park Service
NPS Northeast Region
200 Chestnut Street
Philadelphia, Pennsylvania 19106

Dear Ms. Rust:

This letter serves to inform the National Historic Landmark Philadelphia Region (NHL Office) of the Federal Highway Administration's (FHWA) finding that proposed Project No. FR192B11, the I-270/ US 15 Multi-Modal Study, would have an adverse effect on historic properties, including the Monocacy National Battlefield, which is a National Historic Landmark (Monocacy National Battlefield NHL). FHWA is assisting the Maryland State Highway Administration (SHA) with this highway improvement project in Montgomery and Frederick Counties, Maryland. FHWA and SHA have begun consultation with the Maryland State Historic Preservation Officer (MD SHPO or Maryland Historical Trust [MHT]), and a copy of the letter SHA sent to him as well as a copy of the letter sent to the Monocacy National Battlefield's Superintendent, Ms. Susan Trail, are included as Attachments 1 and 2. FHWA invites the NHL Office to consult with us and the MD SHPO regarding impacts of the project on the Monocacy National Battlefield NHL.

The overall project involves the addition of travel lanes along I-270 and US 15, and construction of a bus or rail transit system (the Corridor Cities Transitway, or CCT) in Montgomery County. Several combinations of highway and transit strategies are under study for the overall project, including general-purpose lanes, high occupancy vehicle (HOV) lanes, express toll lanes (ETL), auxiliary lanes, and collector-distributor (C-D) lanes; general-purpose lanes (GPL), the transit component of the project includes Light Rail Transit (LRT), Bus Rapid Transit (BRT), or Premium Bus Service.

On February 15 and March 14, 2002, SHA coordinated project effects with the MD SHPO for Build Alternatives 3A, 3B, 4A, 4B, 5A, 5B and 5C, each of which consist of a highway and a transit component. The highway component varies from the addition of one (1) HOV lane in each direction (Alternative 3); one (1) GPL in each direction (Alternative 4); or an "Enhanced Alternative" adding one HOV and one GPL in each direction (Alternative 5). In general, the Enhanced Alternative has greater right-of-way needs and impacts. In Frederick County, the

MOVING THE AMERICAN ECONOMY

alternatives are referred to as Alternatives 3, 4, 5, 6 and 7 because they lack the transit component. Alternatives 3 and 4 would add one lane through the battlefield in each direction, while Alternative 5 would add two lanes in each direction.

SHA has subsequently developed Alternatives 6A, 6B, 7A and 7B, and has made minor design changes to the CCT and to previously coordinated Alternatives. The two new alternatives involve Express Toll Lanes (ETL), tolled highway lanes intended to provide new capacity sooner than possible through traditional funding sources. Alternative 6 would add two ETLs in Montgomery County and one ETL in Frederick County. Alternative 7 would add two ETLs in Montgomery County and two ETLs in Frederick County. In Frederick County the alternatives are limited to ETL lanes south of the Monocacy Battlefield. Through the Monocacy National Battlefield NHL to MD 85, the highway will be widened to four general purpose lanes in each direction for Alternatives 6 and 7. This is also the case for US 15 from I-70 to Biggs Ford Road.

FHWA and SHA coordinated with the National Park Service (NPS) and MD SHPO through a series of meetings held in 2002 and 2003. Most recently, SHA met with NPS on November 8, 2007 and February 15, 2008, in order to re-initiate contact with NPS staff. SHA's discussions with the NPS focused on impacts to the Monocacy National Battlefield NHL, and on previously discussed methods to avoid, minimize, or mitigate those impacts. We will contact NPS and MD SHPO to resume formal coordination meetings in the near future.

Project plans for the highway component within the battlefield are included as Attachment 3.

Funding:
Federal funds are anticipated for this project.

Area of Potential Effects

In determining the Area of Potential Effects (APE) for this project, SHA considered possible physical, visual, atmospheric and/or audible impacts to historic properties, both archeological sites and standing structures, that would diminish any National Register of Historic Places (NRHP) qualifying characteristic or the historic property's integrity. The project involves widening of I-270 and US 15, which will require right-of-way, as well as permanent and temporary easements. SHA has limited the APE to those identified standing historic properties that are within 250 feet of the proposed I-270 and US 15 because of the character of the built environment in both Montgomery and Frederick Counties. In areas where the historic property's boundary extends beyond 250 feet, SHA has included the entire property, such as Monocacy National Battlefield. The archeological survey area within the APE is defined as the limits of construction where ground disturbance would occur. Because SHA is not coordinating effects of ancillary projects outside the proposed right-of-way limits, there are no discontiguous portions of the APE. Alternatives 3, 4, 5, 6, and 7 fall within the same footprint and the defined APE also applies to historic properties associated with the earlier identified alternatives. The APE is indicated on the attached SHA quadrangle maps for Urbana and Frederick (Attachment 4).

Identification Methods and Results

Potentially significant architectural and archeological resources were both researched as part of the historic investigation instigated by the I-270/ US 15 Multi-Modal Study, SHA Project No. FR192B11.

Architecture: SHA Architectural Historian Anne E. Bruder consulted project files, including previous correspondence, the project's 2002 Draft Environmental Impact Statement (DEIS), the SHA-GIS quadrangle mapping; and attended project meetings. Ms. Bruder made field visits on June 6, August 4, August 8, August 9, August 27 and October 2, 2006 and again on October 1 and October 9, 2007 to assess the potential for historic standing structures and project impacts.

Historic properties in the APE exemplify important events in central Maryland such as colonial settlements, the Civil War, the railroad, agriculture, and suburban Federal government facilities in both counties. Historic properties include the Monocacy National Battlefield (F-3-42), which is also a National Historic Landmark.

As you know, the Monocacy National Battlefield is a 1,647 acre National Park which was the site of the 1864 battle between the Confederate Army and Union troops defending Washington, D.C. It was made a National Historic Landmark (NHL) in 1973 for its importance as a battlefield (NRHP Criterion A, events). SHA proposes to widen I-270 within the NHL. The I-270/US 15 Multi-Modal Study Alternatives 3 and 4 will require widening of I-270 by three lanes in each direction, while Alternatives 5, 6 and 7 will require widening of I-270 by four lanes in each direction. There is no transit planned for this portion of I-270. On February 15, 2002, SHA determined that Alternatives 3, 4, and 5 would have adverse physical impacts on the Monocacy National Battlefield NHL as discussed in the Adverse Effect Letter and 2002 DEIS. Each Alternative calls for widening of the highway. Three measures were considered to minimize the impacts: steeper slopes, retaining walls, and reduced inside shoulder width. Based on SHA's 2008 review of the 2002 DEIS and Adverse Effect Letter, these alternatives continue to have adverse impacts on the Monocacy National Battlefield. Avoidance of the NHL is not possible due to the location of I-270 within the battlefield.

During the earlier consultations, SHA proposed to reduce the physical impact of the highway by shifting the highway's centerline west to avoid any change in the existing east right-of-way location. By proposing highway widening only to the west, the eastern side of the park would not be impacted. The NPS agreed with this proposed minimization strategy. The centerline shift will require 14.50 acres from the historic property.

At the same time, the traffic noise will also impact the historic landmark. The current noise levels are between 66 decibels (dBA) and 67 dBA, and SHA's models indicate that the 2030 build options noise levels will rise to between 76 dBA and 77 dBA. Under the Federal Highway Administration's (FHWA) guidelines this amount of noise is considered an impact requiring abatement. Previous discussions between SHA and the NHL had concluded that noise barriers would not be appropriate in this location; however, we intend to discuss the feasibility of an interpretive relief noise barrier as a mitigative measure. SHA will continue to work with the NHL to find ways to avoid or reduce the noise impacts where possible. However, as now planned the I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7 through the Monocacy National Battlefield NHL, and the attendant increase in traffic noise meet the requirements of 36 CFR §800.5 and will have an adverse impact on the historic landmark.

Archeology: SHA archeologist Richard Ervin assessed the archeological potential of the referenced project based on examination of previous archeological studies, soils maps, historic maps, topographic maps, and the SHA-GIS Cultural Resources Database. The re-assessment

follows the previous June 1, 2001 assessment by SHA archeologist Mary Barse. Field visits were made to the project area on July 20 and July 26, 2007.

The project crosses the Eastern and Western Piedmont Physiographic Provinces. Topography ranges from moderately to steeply rolling terrain with incised stream valleys in the south and east, to the broad, level terraces of the Monocacy River floodplain to the north and west. A total of 87 sites have been recorded on the USGS Germantown and Urbana quadrangles. This data shows that sites occur both on well-drained terrain near surface water, as expected, and on steep, rocky soils.

Kavanagh (1981) studied the I-270 corridor from the Spur north to MD 121 and recorded thirteen sites, all outside the present APE or destroyed prior to 2000. A number of other sites have been recorded in or near the APE, and numerous surveys of smaller areas near the APE have been conducted by various investigators. Fiedel's (2000) investigation of Alternatives 3, 4, and 5 considered the I-270 and US 15 mainlines, the CCT, new interchanges, improvements to existing interchanges, and park and ride locations. Fiedel's survey recorded eight archeological sites and examined six recorded sites. None of the investigated sites was considered eligible for listing on the NRHP, and MHT concurred with these determinations on November 26, 2001.

Alternative 6 differs from previously coordinated Alternative 3 primarily by the proposed use of ETL rather than HOV lanes, but proposed impacts are comparable. Enhanced Master Plan Alternative 7 (proposing the addition of two lanes where one is called for by the Montgomery County Master Plan) is comparable to previously coordinated Alternative 5. Therefore, impacts from Alternative 6 and 7 are generally similar to Alternatives 3 and 5 examined by Fiedel (2000). Minor design changes have been made over the last seven years, including a reconfigured ramp at the proposed New Cut Road interchange; a new Park & Ride lot at the Biggs Ford Road interchange; and a relocated stormwater management pond at the Monocacy Road interchange. Numerous additional stormwater management pond locations will be determined for the project in the future.

No further archeological investigations are recommended for Alternatives 6 and 7 at this time, because the APE was previously examined by Fiedel (2000). Additional archeological work will likely be required in the future as design details are developed. Current plans still lack specific design details, and identification of project elements such as stormwater management ponds has not yet been completed. SHA's September 5, 2001 letter noted the need for additional work at several locations that would be impacted by project design changes, and on November 26, 2001 MHT concurred with SHA's recommendation to defer that work. Archeological investigations are now underway at several of the referenced locations that will be impacted by breakout projects at interchanges, or by wetland mitigation work. Aside from break-out projects at these or other locations, SHA continues to recommend that additional archeological identification be conducted after design changes are resolved and the number of alternatives is reduced. At that time, SHA plans to resume negotiations with MHT and the NPS to begin to develop a Memorandum of Agreement stipulating that SHA shall undertake additional archeological identification of high potential areas not covered by our previous survey, together with evaluation and mitigation work, as warranted.

Attachment 4 provides the results of the archeological assessment indicating the areas that will require supplemental archeological identification studies for current design impacts. A number

of these areas were identified in SHA's September 5, 2001 letter to MHT, while other locations reflect more recent design modifications. Additional work will also likely be needed for stormwater management pond locations that have not yet been identified.

Thank you for your assistance in this matter. Please contact Mr. Dan Johnson of my staff at 410-779-7154, with questions regarding this submission.

Sincerely yours,

Daniel W. Johnson

for Nelson J. Castellanos
Division Administrator

Enclosures: 1) SHA Adverse Effect Letter to MD SHPO
2) SHA Adverse Effect Letter to NPS
3) Project Plans
4) APE Maps
5) Archeological Assessment

cc: Mr. Daniel W. Johnson, Federal Highway Administration
Mr. J. Rodney Little, Maryland State Historic Preservation Officer
Mr. Bruce Grey, Office of Planning and Preliminary Engineering, State Highway Administration
Mr. Joseph Kresslein, Project Planning Division, State Highway Administration
Dr. Julie M. Schablitsky, Project Planning Division, State Highway Administration
Mr. Donald H. Sparklin, Project Planning Division, State Highway Administration
Susan Hinton, NPS/Wash DC
Susan Trail, NPS/MNBNHL,
Carol Legard, ACHP

DJohnson:jeh 7-11-08 S:/DJohnson/LetterMD071108NPS.doc

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Saving America's Hallowed Ground

Theodore Sedgwick
Chairman

James Lighthizer
President

September 22, 2008

Anne E. Bruder
Architectural Historian
Maryland State Highway Administration
707 North Calvert Street
Mailstop C-301
Baltimore, MD 21202

FACSIMILE TRANSMISSION: 410-209-5004
Original document will follow by first class mail

Dear Ms. Bruder:

On behalf of the 65,000 members of the national Civil War Preservation Trust, I would like to thank you for inviting our organization to serve as a consulting party to the I-270 Multi-Modal Study. We accept your invitation and looking forward to working with the Maryland State Highway Administration (SHA), National Park Service (NPS), Maryland State Historical Preservation Office (SHPO), and the Advisory Council to discuss ways to minimize and mitigate the unavoidable impacts of the proposed widening. We understand that our role in this process will be to attend the meetings and voice our opinions and concerns; however, we will not be signing on to the Memorandum of Agreement.

We agree with SHA's determination that there will be adverse effects to the Monocacy Battlefield by the proposed widening of I-270, which bisects the battlefield. CWPT's position is that Alternative 1, "no build," or Alternative 2, maintaining the existing section, is preferred. However, if that is not possible, the only acceptable alternatives would be Alternative 3 or 4, which would increase the road's footprint by one additional lane in each direction through the battlefield, staying within the current right-of-way.

We find it disheartening that the two new proposed toll-lane alternatives—Alternatives 6 and 7—would both have the same footprint, equal to two additional lanes in each direction through the battlefield. We would prefer that one of the new alternatives have a footprint equal to Alternatives 3 or 4, with only one additional lane in each direction through the battlefield. While Alternative 6 calls for one additional lane in each direction, the plan also includes a wide shoulder that would allow for the addition of a fourth lane in the future if necessary. We believe this is poor policy and planning. Alternative 7 includes two additional lanes through the battlefield, with a narrow shoulder. Since Alternatives 6 and 7 have the same footprint, we strongly prefer neither of these alternatives be selected.

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An expansion of the size included in Alternatives 6 and 7 would result in the bulldozing of land associated with the decisive phase of the battle, a ferocious afternoon contest between 6,000 men in the divisions of Union General James B. Ricketts and his Confederate counterpart, General John B. Gordon. The Civil War Sites Advisory Commission classified Monocacy as a Priority I, Class B battlefield—one of its highest designations.

In addition, we suggest that SHA conduct an analysis of the adverse impacts to the battlefield as a cultural landscape. The current adverse impact analysis focuses solely on the physical taking of land and increased noise levels. Adverse impacts to the setting, feeling and association of the battlefield must also be considered in any minimization and mitigation discussions.

CWPT supports mitigation options including placement of berms or construction of a road cut with steep slopes to minimize sight and sound intrusions; plus, a pedestrian overpass or tunnel to physically connect the two halves of the battlefield. These combined actions would decrease noise and visual pollution, promote the kind of contemplative experience a national battlefield should inspire, and better knit together the two halves of the current park, allowing the safe passage of park visitors wishing to see the battlefield in its entirety.

Finally, although the proposed improvements to the Rt. 85 interchange are a separate study, we must state CWPT's fierce opposition to any HOV ramp and exit adjacent to the Best Farm. It is our understanding that these flyover ramps will be built 25 feet above I-270. These structures would be within the viewshed of the park and be a severe visual intrusion near the new Monocacy Battlefield visitors center.

Thank you for taking the time to consider our views on the ill-advised proposal to expand I-270 at the Monocacy National Battlefield.

Sincerely,

O. James Lighthizer, President

Gaithersburg

July 22, 1996

Joseph R. Kresslein
Assistant Division Chief
Project Planning Division
Maryland Department of Transportation
State Highway Administration
P.O. Box 717
Baltimore, MD 21203-0717

RE: Contract No. F 192-101-772
I-270 south of Shady Grove Road

Dear Mr. Kresslein,

In response to your inquiry, I am enclosing a complete chart of all City parks and facilities. The chart contains pertinent information about the parks including size, amenities and address. It appears to me from the map of the project area, that all of these parks and facilities are within the project study area. Each and every park and facility in the system is significant - either serving a City-wide function, or a particular neighborhood. The following parks were constructed with the assistance of Program Open Space funds: Diamond Farms Park, Kelley Park, Malcolm King Park, Morris Park, Robertson Park, Summit Hall Farm Park, Walder Park and Washingtonian Woods Park. Casey Community Center was also supported by POS funds.

In regard to your specific inquiry about the City-owned land that you have referred to as "Metropolitan Grove Road Park," it is our understanding that the open space was given to the City when the State Department of Transportation concluded that the land was not needed during the design and construction of the I-270/MD 124 Interchange. The property in question, which is also known as the Browns Station park, has not been developed as an active recreational facility. The property is zoned MXD Mixed Use Development and the City's Master Plan has given the westerly portion of the area a land use designation of Commercial-Office-Residential in conjunction with the proposal for high density mixed-use development centered

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MAYOR
W. Edward Bohrer, Jr.

COUNCIL MEMBERS
Stanley I. Alster
Geraldine E. Edens
Sidney A. Katz
Gertrude M. Kildee

CITY MANAGER
David B. Humpton

around the Metropolitan Grove MARC Station and the future Shady Grove-Clarksburg Transitway. The Master Plan designates the easterly portion of the property along I-270 as Open Space in recognition of the need to protect this environmentally sensitive landscape and to provide for a substantial buffer to remain in place along I-270 in anticipation of future development.

Please do not hesitate to contact me at 258-6356 if further information is required.

Sincerely,

Priscilla Chambers

Priscilla Chambers
Assistant Director
Department of Parks and Recreation

DEPARTMENT OF PUBLIC WORKS
Bureau of Parks and Recreation
Frederick County, Maryland
118 North Market Street • Frederick, Maryland 21701 • (301) 694-1646 • FAX (301) 694-1808

DIRECTOR
Robert M. Hoyt, P.E.

BUREAU CHIEF
Gilbert L. Kingsbury

April 18, 1996

Mr. Joseph Kresslein
Maryland Department of Transportation
State Highway Administration
P.O. Box 717
Baltimore, Md. 21203-0717

RE: SHA Project Planning Studies
Bureau of Frederick County Parks & Rec.

Dear Mr. Kresslein:

After reviewing your March 29, 1996 request for information on park facilities within the study area, I forwarded a copy of the letter and maps to Jim Schmersahl of Frederick City and John Howard of the NPS Monocacy National Battlefield on April 10th. There are two parks, Rose Hill Manor and Urbana Community Park, within the study area under the jurisdiction of the Frederick County Bureau of Parks and Recreation which are discussed below.

Rose Hill Manor Park

This 43 acre historical and cultural park located at 1611 North Market Street in Frederick was the home of, Maryland's first governor, Thomas Johnson. A Touch and See Children's Museum includes the Manor, Icehouse, Early American Garden and Orchard, Log Cabin, Blacksmith Shop and Summer Kitchen/Smokehouse. A Carriage Museum and Farm Museum are also located on the site. Various special events and interpretive programs are held throughout the year.

Program Open Space funds have been utilized in the past for park development. There are no funds scheduled in the County's six year Capital Improvements Program (CIP) for additional development.

This park's function is very significant is meeting the historical and cultural needs of all of Frederick County and even areas outside the County. The "Touch and See Children's Museum" is a unique interpretive facility in the State and the region. A brochure is enclosed for your reference. Should you need more specific information on the site or its programs you may contact Ms. Colin Clevenger at (301) 694-1648. The Park's address is 1611 North Market Street, Frederick, Md. 21701.

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Urbana Community Park

This 20 acre park is located on the west side of Urbana (Md. 355) in Urbana. Facilities include 3 little league fields, a soccer field, practice soccer fields, play equipment, grills, 3 lighted tennis courts, horseshoe courts, family picnicking, a small shelter and a walking trial. A second development phase is scheduled in the County's six year CIP for Fiscal 2001. Facilities to be developed are expected to include: extension of the park road, additional parking, group picnic shelters, a playground, a basketball court, installation of water utilities and restrooms. Refer to the enclosed master plan for additional information.

Program Open Space funds have been utilized in the past for park acquisition and development.

This park's function is also significant in meeting the recreational needs of the Urbana community. There is a shortage of recreation and park facilities in this rapidly growing area. A new high school recently opened in Urbana.

Let me know if you have any questions or need additional information. Thank you for your attention.

Sincerely,

Bob Failor

Bob Failor
Assistant Administrator

Enclosures (2)
cc: file
Gil Kingsbury
Colin Clevenger

MEMORANDUM

TO: Ms. Cynthia D. Simpson
Deputy Director
Office of Planning and
Preliminary Engineering

FROM: Steve Plano
Project Manager for
Project Planning Division

DATE: February 21, 2002

SUBJECT: Project Number FR192B11
I-270/US 15 Multi-Modal Corridor Study
Shady Grove Metro Station to Biggs Ford Road

RE: July 17, 2001 Department of Natural Resources Coordination Meeting

Members of the I-270/US 15 project team met with Maryland Department of Natural Resources (DNR) representatives on Tuesday, July 17, 2001 to review the possible impacts to Seneca Creek State Park from the proposed I-270 highway and transitway alternates. The following people were in attendance:

Jeremy Beck	SHA – PPD
Walter Brown	MD Department of Natural Resources
Angie Ehrhart	RK&K
Anne Elrays	SHA – PPD Environmental
Mark Epstein	RK&K
Derick Hallahan	RK&K
Dan Johnson	FHWA
Steve Plano	Parsons Brinckerhoff
Charlie Utermohle	McCormick, Taylor & Associates, Inc.

The meeting began at 9:00 AM with brief introductions. The following is a summary of the topics discussed.

Schedule/Status of Study
Steve Plano gave a brief overview of the study's upcoming activities, and distributed a sheet summarizing the study's major milestones (see attached). The Draft Environmental Impact Statement is expected to be completed in Spring 2002, and a Location/Design Public Hearing is

also anticipated in Spring 2002. The SHA expects to select a Preferred Alternate in Spring 2003. Location/Design approvals are expected in Summer/Fall 2003.

Park Boundary Confirmation
Steve Plano presented the I-270 alternates mapping and asked DNR to confirm the Seneca Creek State Park boundary as presented on the mapping for accuracy.

Walter Brown suggested that the Seneca Creek Greenway Trail should be displayed on the mapping. This narrow unpaved hiking trail extends through the park from MD 355 to the Potomac River. Although there are no plans to upgrade the trail to a multi-use facility, DNR suggested that this trail could eventually connect to the hiker-biker trail along the proposed Corridor Cities Transitway (CCT).

Alternates Being Evaluated
The I-270 build alternates include both highway and transit components. Within the area of the Seneca Creek State Park boundary, the highway components propose converting the existing inside southbound general-purpose lane on I-270 to an HOV lane, as well as constructing a two-lane Collector-Distributor (C-D) roadway and one auxiliary lane (between Watkins Mill Road and Middlebrook Road) in each direction. The highway widening alternates under consideration result in outside widening along I-270 within the park boundaries. In order to be consistent with the I-270/Watkins Mill Road interchange study, the I-270/US 15 Multi-Modal Corridor Study will incorporate the southbound painted C-D typical section and the eastern mainline alignment shift. This section will reduce impacts to the park; however, the I-270/US 15 Study will result in additional park impacts than stated in the Watkins Mill Road Study due to the C-D lanes being extended through the park, the proposed northbound and southbound auxiliary lanes, and the proposed transitway alignment to the west.

The transit components of the build alternates propose either Light Rail Transit (LRT) or Bus Rapid Transit (BRT) on the CCT alignment. The right-of-way requirements presented at the meeting included impacts associated with the CCT alignment, which runs parallel to and west of I-270 within the park boundary. Steve stated that the master planned CCT alignment is a long-term planning study with a 20 to 25 year time frame for construction and is based on a general master plan study by Montgomery County; detailed engineering work still needs to be completed.

Potential Impacts
The study team distributed a sheet summarizing potential right-of-way impacts to Seneca Creek State Park both with and without retaining walls.

Highway Impacts
The total *preliminary* pre-avoidance (no retaining walls) highway impact to Seneca Creek State Park is approximately 8.1 acres, based on a 25 foot buffer distance from the cut/fill line to the proposed right-of-way line. If retaining walls were provided along the length of the park, this would minimize park right-of-way impacts to approximately 3.2 acres. These retaining walls

would range in height from approximately 24 feet high on the northbound side to approximately 19 feet high on the southbound side, and would vary in visibility from the road and from the park, depending upon the topography. The walls would generally be visible from the park for approximately 700 to 900 feet north of the bridge over Seneca Creek. Walter Brown stated that DNR would most likely favor retaining walls over grading since retaining walls would reduce right-of-way impacts.

Transitway
The transitway right-of-way impact to Seneca Creek State Park is approximately 5.8 acres.

Highway and Transitway
The *preliminary* pre-avoidance (no retaining wall) combined highway and transitway right-of-way impact to the park is approximately 11.1 acres due to overlapping impacts between the highway and transit alternates. Please note that the design of both the highway and transitway in this section are preliminary and the right-of-way impacts may be refined as the study progresses.

Walter Brown stated that Seneca Creek State Park contains approximately 7,000 acres, and noted that the right-of-way impacts from the I-270 study seemed reasonable. For right-of-way impact mitigation, DNR would require a 1:1 replacement of land taken, and the replaced land should be contiguous to the park. Walter Brown noted that the park is a wildlife habitat, and that watershed and right-of-way impacts should be minimized. Walter Brown will consider the need to address any critical view shed impacts to the park.

Study team members explained that the storm water management pond on the east side of I-270, north of Great Seneca Creek, would most likely be impacted by the proposed highway widening. Steve stated that the study team will continue to review right-of-way impacts in this area to determine whether a portion of the pond will be impacted or if the entire pond will need to be taken. Walter Brown confirmed that DNR owns this storm water management pond.

Follow Up Items

- Subsequent to the meeting, Walter Brown has confirmed park boundaries and the location of the Seneca Creek Greenway Trail.
- Walter Brown to provide any view shed issues to Anne Elrays.
- RK&K/PB to continue evaluating the right-of-way impacts through the park based on the proposed highway and transitway alternates.

If you have any questions, please contact Steve Plano, the project manager for SHA, by telephone at 410-545-8547, by email at plano@pbworld.com, or the environmental manager, Anne Elrays at 410-545-8562.

Attachments
cc: File (with attachments)
Attendees

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MEMORANDUM

TO: Ms. Cynthia D. Simpson
Deputy Director
Office of Planning and
Preliminary Engineering

FROM: Steve Plano
Project Manager for
Project Planning Division

DATE: February 21, 2002

SUBJECT: Project Number FR192B11
I-270/US 15 Multi-Modal Corridor Study
Shady Grove Metro Station to Biggs Ford Road

RE: September 5, 2001 Maryland National Capital Park and Planning Commission Coordination Meeting

Members of the I-270/US 15 project team met with Maryland National Capital Park and Planning Commission (M-NCPPC) representatives on Wednesday, September 5, 2001 to review the possible impacts to Black Hill Regional Park from the proposed I-270 highway and transitway alternates. The following people were in attendance:

Jeremy Beck	SHA – PPD
Kathleen Dearstine	M-NCPPC
Sue Edwards	M-NCPPC
Angie Ehrhart	RK&K
Anne Elrays	SHA – PPD Environmental
Derick Hallahan	RK&K
John Hench	M-NCPPC – Countywide Planning
Dan Johnson	FHWA
Karen Kumm Morris	M-NCPPC – I-270 Corridor
Jim McMahon	M-NCPPC – Black Hill Region
Rosemary Nichols	M-NCPPC – Black Hill Region
Steve Plano	Parsons Brinckerhoff
Russell Walto	SHA - PPD

The meeting began at 10:30 AM with brief introductions. The following is a summary of the topics discussed.

Schedule/Status of Study
Steve Plano gave a brief overview of the study's upcoming activities, and distributed a sheet summarizing the study's major milestones (see attached). The Draft Environmental Impact Statement is expected to be completed in Spring 2002, and a Location/Design Public Hearing is also anticipated in Spring 2002. The SHA expects to select a Preferred Alternate in Spring 2003. Location/Design approvals are expected in Summer/Fall 2003.

Park Boundary Confirmation
Steve Plano presented the I-270 alternates mapping and asked M-NCPPC to confirm the Black Hill Regional Park boundary as presented on the mapping for accuracy.

M-NCPPC noted that the southernmost area on the east side of I-270 shown on the alternates mapping as part of Black Hill Regional Park is currently privately owned land. The area is designated to be part of the future Clarksburg Greenway, and M-NCPPC asked that it remain labeled as park property on the alternates mapping. M-NCPPC asked that consideration be given to providing larger extensions to the culvert in the southern portion of the park such that they may be able to provide a trail connecting the east and west sides of the park during dry conditions. Steve Plano asked that M-NCPPC provide the study team with a copy of their master plan for Black Hill Regional Park. M-NCPPC provided an overview of their development plans and surrounding development that they are aware of to the study team. M-NCPPC is planning a maintenance facility on the west side of I-270 in a clearing over 1,000 feet from the existing highway, as well as undergoing a study of an access road from Crystal Rock Drive as shown of the 1989 Germantown Master Plan. M-NCPPC also noted the status of the Clarksburg Triangle residential development on the west side of I-270 as being 10+ years and that the Crystal Rock pumping station is under construction on the west side of I-270.

Alternates Being Evaluated
The I-270 build alternates include both highway and transit components. Within the area of the Black Hill Regional Park boundary, the highway components propose converting the existing southbound inside general-purpose lane to an HOV lane and adding two general-purpose lanes to the outside in both the northbound and southbound directions. Approximately 900 feet north of the northern boundary of Black Hill Regional Park (West Old Baltimore Road), the I-270/US 15 Multi-Modal Corridor Study proposes a new interchange, I-270/Newcut Road, as shown on the Clarksburg Master Plan. This new interchange will have direct access ramps (ramps from the median carrying traffic directly from the HOV lanes to the proposed Newcut Road) to serve the proposed transitway's Comsat Station. Due to these direct access ramps, no widening to the inside can occur throughout the Black Hill Regional Park.

The transit components of the build alternates propose either Light Rail Transit (LRT) or Bus Rapid Transit (BRT) on the CCT alignment. Within the Black Hill Regional Park vicinity, the transitway is proposed to run along the median of the Observation Drive (a proposed roadway not part of the I-270/US 15 Multi-Modal Corridor Study). Steve Plano stated that the master planned CCT alignment is a long-term planning study with a 20 to 25 year time frame for

construction and is based on a general master plan study by Montgomery County; detailed engineering work still needs to be completed.

Potential Impacts
The study team distributed a sheet summarizing potential right-of-way impacts Black Hill Regional Park both with and without retaining walls.

Highway Impacts
The total *preliminary* pre-avoidance (no retaining walls) highway impact to Black Hill Regional Park is approximately 7.5 acres, based on a 25 foot buffer distance from the cut/fill line to the proposed right-of-way line. If retaining walls were provided along the length of the park, this would minimize park right-of-way impacts to approximately 4.2 acres. These retaining walls would range in height from approximately 4 feet to 17 feet high on the northbound side to approximately 20 feet high on the southbound side, and would vary in visibility from the road and from the park, depending upon the topography. The walls would generally be visible from the park. M-NCPPC gave no indication on their preference for retaining walls over grading, but instead asked for time to review the areas within the proposed right-of way for large trees and animal habitats.

Transitway
There are no transitway right-of-way impacts to Black Hill Regional Park.

Dan Johnson suggested a shifting the centerline of the highway to the east such that all widening would occur to the east of the existing highway, therefore eliminating or at least reducing the impacts to the park property on the west side of I-270. Karen Kumm Morris stated that due to the zoning of the Linthicum Farm on the east side of I-270, they would prefer an equal balance of widening on both sides of I-270. M-NCPPC noted that for right-of-way impact mitigation, they would require a 1:1 replacement of land taken, and the replaced land should be contiguous to the park. M-NCPPC asked the time frame under which SHA would begin to purchase land. Study team members stated that the earliest time at which land could begin to be purchased is 5 years. M-NCPPC asked whether noise issues were being studied in the Black Hill Regional Park. Study team members explained that noise was being studied at sensitive locations in the I-270/US 15 corridor, however Black Hill Regional Park was not one of the locations being studied. M-NCPPC questioned how widening to the outside would affect the stream on the west side of I-270. The study team replied that relocation of the stream and wetland replacement is being studied.

Follow Up Items
- M-NCPPC to confirm park boundaries and provide the master plan for Black Hill Regional Park.
- M-NCPPC to provide vegetation and habitat concerns to Anne Elrays.
- RK&K/PB to continue evaluating the right-of-way impacts through the park based on the proposed highway and transitway alternates.

If you have any questions, please contact Steve Plano, the project manager for SHA, by telephone at 410-545-8547, by email at plano@pbworld.com, or the environmental manager, Anne Elrays at 410-545-8562, by email at aelrays@sha.state.md.us.

Attachments
cc: File (with attachments)
Attendees

Parris N. Glendening
Governor

J. Charles Fox
Secretary

Maryland Department of Natural Resources

Kathleen Kennedy Townsend
Lt. Governor

Tawes State Office Building
580 Taylor Avenue
Annapolis, Maryland 21401

Karen M. White
Deputy Secretary

March 22, 2002

Ms. Anne Elrays
Project Planning Division
State Highway Administration
P.O. Box 717
Baltimore, MD 21203

Re: Widening of I-270, Urbana Lake FMA, (2002-DNR-032)
Widening of I-270, Seneca Creek SP, (1996-DNR-030)

Dear Ms. Elrays,

Thank you for providing the requested mapping needed for our review of this project. The information is currently being reviewed within DNR and we will provide you with any comments that result from that process. The information you requested in your January 29, 2002 letter is included below.

Urbana Lake Fish Management Area

Please find enclosed the requested map of the Urbana Lake FMA. The facility consists of a managed fishing area and a public parking area. Due to the remote nature of the facility, public use figures are not kept. However, the volume of public use can be quite high at times, for instance, after the lake has recently been stocked. The Urbana Lake Fish Management Area is a unique local resource of considerable significance to the area residents. However, if State Highway Administration's plans are implemented in accordance with input from DNR in such a way that they do not create negative impacts to the use of the facility, it will be possible to avoid compromising the facility's significance. No Program Open Space or Land and Water Conservation funds were used for the acquisition of Urbana Lake FMA. However, Sport Fish Restoration money from the U.S. Department of the Interior is regularly used for management and maintenance activities for the facility.

Seneca Creek State Park

Facilities at Seneca Creek State Park provide a wide variety of day use opportunities, including hiking and nature study, bicycling and mountain biking, equestrian use, boating and fishing, picnicking, playgrounds, disc golf, baseball and multi-use athletic fields. There have been no

DNR TTY for the Deaf: (410) 260-8835
Toll Free#: 1-877-620-8DNR

significant changes in the master planning goals or site plans for the facility since the information in our 1996 letter was provided. Although several parcels of Seneca Creek State Park were acquired with Program Open Space and Land and Water Conservation funds, the entire park is currently considered 'federalized,' which eliminates the segmentation of funding requirements for individual parcels within the park, in cases where their uses are converted. Recent use figures for Seneca Creek SP have been requested and I will forward those to you when I receive them.

I look forward to continuing to work with you as the project progresses. Feel free to call me at (410) 260-8410 if you need any further information.

Sincerely,

Amber Widmayer
Associate Planner for the Central Region

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

April 8, 2002

Cynthia D. Simpson
Deputy Director
Office of Planning and Preliminary Engineering
Maryland Department of Transportation
P.O.Box 717
Baltimore, MD 21203-0717

Dear Ms. Simpson:

Please find attached comments from the Park Planning and Resource Analysis Unit on the widening of I-270 and Corridor Cities Transitway implementation evaluated in the I-270/US15 Multi-Modal Corridor Study and the anticipated impacts to Middlebrook Hill Neighborhood Conservation Area, Black Hill Regional Park, North Germantown Greenway and Little Bennett Regional Park in Montgomery County. This is in response to your letter of January 29, 2002 and your request, which was clarified in our meeting at the Historical Preservation Unit. We trust that we responded accordingly.

Summary of Recommendations

Further to our review of the October 19, 2001 version of the Draft Environmental Impact Statement (DEIS), we have identified primary and secondary impacts to the affected parklands. We have also begun identifying mitigation measures that the Maryland State Highway Administration (SHA) and the Maryland Transit Administration (MTA) might consider in preparing the Final Environmental Impact Statement. These measures include: replacement parkland, noise mitigation, stream stabilization, stormwater management, wetlands mitigation, reforestation, and safe trail crossings of the I-270 roadway.

This Unit believes that the I-270 project presents the opportunity to fulfill a Countywide Park Trails Plan objective for safe crossings of the I-270 roadway. This might best be done at the Ten Mile Creek crossing just south of Comus Road as well as at other locations shown on the attached Countywide Park Trails Plan, approved by the Planning Board in 1998. Consideration might also be given to improving the existing I-270 crossing at Seneca Creek to make it a safe, grade-separated crossing suitable for hiking and equestrian use. In that regard SHA and MTA should coordinate the I-270 crossing of Seneca Creek State Park, as well as potential trail crossings in other areas, with appropriate State Park and Montgomery County Department of Park and Planning staff, respectively.

We look forward to reviewing the signed edition of the DEIS when it is available. We expect that these or similar mitigation measures will be incorporated in the Planning Board comments on the DEIS this summer. In the interim, please feel free to contact Michael Zamore at 301-650-4362 if you have any questions regarding this material.

Sincerely,

Jeff Zyontz
Chief, County-Wide Planning Division

JZ/MZ:ss\D:\Letters\LtrSimpson
Attachment

pc: John E. Hench
Rick Hawthorne
Daniel Hardy
Rob Gibbs
Lyn Coleman
Jim Sorenson
Gordon Rosenthal
Jamie Christianson
Jim McMahon
Wendy Hanley

G:\DATA\Middlebrook.doc

ATTACHMENT 1

PROPOSED WIDENING OF I-270 AND ANTICIPATED IMPACTS TO MIDDLEBROOK HILL NEIGHBORHOOD CONSERVATION AREA, BLACK HILL REGIONAL PARK, NORTH GERMANTOWN GREENWAY AND LITTLE BENNETT REGIONAL PARK

1. MIDDLEBROOK HILL NEIGHBORHOOD CONSERVATION AREA

Primary and Secondary Functions

The Middlebrook Hill Neighborhood Conservation Area contributes to the green space of Montgomery County and serves the functions of recreation, stream protection, and wildlife habitat. The stormwater management pond for nearby housing on High Point Drive and Tributary Lane is located on the facility. There is a mid-nineteenth century (Ricketts family) cemetery located on the northern part of the area, and forested knolls overlooking the small stream at the northern and southern corners of the property might be Native American archaeological sites.

The southern half of the site contains a high quality mixed oak forest. White oak (*Quercus alba*), chestnut oak (*Quercus prinus*) and tulip-poplar (*Liriodendron tulipifera*) are the most common species with dominant trees ranging from 16 to 31 inches in diameter at breast height (dbh). Other tree species noted included red maple (*Acer rubrum*), red oak (*Quercus rubra*), and black cherry (*Prunus serotina*). Due to its proximity to Seneca Creek State Park, its location and the high quality forest that it contains, the area plays a particularly significant role in meeting the immediate outdoor recreation and aesthetics needs of the nearby community.

Anticipated Impacts to Middlebrook Hill Neighborhood Conservation Area

The widening of I-270 as proposed, will have the following environmental and other impacts:

Primary Impacts

1. Loss of approximately 2 acres of mixed hardwood forest that might include some of the largest trees on the site.
2. Increased noise impact (following northward relocation of the existing noise walls).
3. Quantity and quality impacts to the tributary and headwater seep of Seneca Creek along the northwestern edge of the site (shown on the attached map).

4 Reduction in available space for outdoor recreation (particularly by neighborhood children)

Secondary Impacts

1. Erosion impact to parts of the area not previously exposed to stormwater impacts from the I-270 roadway.

2. Quality and quantity impacts to a small spring near the I-270 road right-of-way (R-O-W) (shown on attached map).
3. Increased white-tailed deer contact/impact with residents of the area.

Recommendations

1. Lands taken from Middlebrook Hill Neighborhood Conservation Area should be replaced with equivalent acreage of equivalent natural value, preferably at or near the Ten Mile Creek crossing of the I-270 roadway. SHA and MTA should coordinate with Montgomery County Department of Park and Planning staff to determine how best to use the opportunity presented by the I-270 project to fulfill a Countywide Park Trails Plan objective for safe, grade-separated trail crossings of the I-270 roadway.
2. In the event that the road widening project develops as planned, it is recommended that SHA should consider the following site improvements for Middlebrook Hill Neighborhood Conservation Area:
   - Repairs to, and landscaping of, the stormwater management (SWM) pond and outlet near High Point Drive
   - Construction of a bridge over the creek at the north-western edge of the property to facilitate access to Middlebrook Hill Neighborhood Conservation Area and Seneca Creek State Park for Abbotsford Circle and Plummer Drive/High Point Drive residents.
   - Exploratory archeological/cultural work to determine whether the two forested knolls overlooking the creek are Native American archeological sites.

2. BLACK HILL REGIONAL PARK AND NORTH GERMANTOWN GREENWAY

Observations

1. The portion of Black Hill Regional Park on the western side of Interstate 270 contains a relatively high quality mixed oak forest. Chestnut oak, white oak, and red oak are the most common oak species with dominant trees ranging from 16 to 28 inches in diameter. Other tree species noted included red maple, black cherry, American beech (*Fagus grandifolia*), hickory (*Carya glabra* and *C. tomentosa*), and tulip-poplar. Understory trees and shrubs noted include dogwood (*Cornus florida*), mountain laurel (*Kalmia latifolia*), high-bush blueberry (*Vaccinium corymbosum*), low-bush blueberry (*Vaccinium vacillans*), and American chestnut (*Castanea dentata*).

   A preliminary recording of large trees on the road R-O-W revealed several significant-sized trees. These included 25", 26" and 29" diameter at breast height (dbh) red oaks, a 22", a 21", and a 21½" dbh white oak, two 28", a 29", a 30" dbh tulip-poplar, and a 26½" dbh American beech (in perfect condition).

   The forest is relatively free of non-native invasive species and, despite the obvious signs of deer browse, there is good regeneration of hardwood species, especially chestnut oak,

in the understory. The forest floor is covered with leaf and woody litter. There are many ferns of different species including cinnamon fern (*Osmunda cinnamomea*), Christmas fern (*Polystichum acrostichoides*), rattlesnake fern (*Botrychium virginianum*), interrupted fern (*Osmunde claytonia*), lady fern (*Athyrium filix-femina*), ebony spleenwort (*Asplenium platyneuron*), maidenhair fern (*Adiantum pedatum*), and hay-scented fern (*Dennstaedtia punctilobula*).

There is one area of palustrine wetlands towards the main stem of Little Seneca Creek, one small area of wetlands within the road R-O-W immediately south of West Old Baltimore Road, and several wet communities of skunk cabbage (*Symplocarpus foetidus*) and Jack-in-the-pulpit (*Arisaema triphyllum*), throughout the length of the R-O-W between West Old Baltimore Road and Little Seneca Creek (see attached map).

If the area were to be assessed as to priority for a Forest Stand Delineation study, it would be rated a "1" – High Priority.

2. There is evidence of heavy erosion from drainage pipes and past erosion control work along approximately 400 feet of the R-O-W (Area "B" on attached map) on Black Hill Regional Park. This has resulted in some localized movement of undersized or poorly placed rip-rap boulders, severe flooding and silt deposition towards the main stem of Little Seneca Creek (Area "B" on attached map), and further modification of the stream channel. Some tree mortality has also occurred in that area. Erosion control work needs to be initiated in those areas.

3. The proposed transitway between Observation Drive and Newcut Road (proposed) on the eastern side of I-270 bisects the North Germantown Greenway (through existing R-O-W) and crosses wetlands and a tributary of Little Seneca Creek.

4. There will be wetlands impact at North Germantown Greenway within the road R-O-W.

5. Stormwater management facilities are not shown on the plan.

Anticipated Impacts to Black Hill Regional Park and North Germantown Greenway

Widening of both eastern and western sides of Interstate 270 (between West Old Baltimore Road and Little Seneca Creek) will result in the following:

Primary Impacts

1. Loss of a high quality stand of hardwood forest with significant-sized trees and associated biodiversity along the western road R-O-W.

2. Loss of palustrine wetlands and wetland buffers at Black Hill Regional Park and North Germantown Greenway.

3. The loss of approximately 2 acres from North Germantown Greenway and an estimated 17 acres from Black Hill Regional Park. (Widening on the eastern side only will result in the loss of 2-3 acres from North Germantown Greenway and approximately 7 acres from Black Hill Regional Park).

4. Westward relocation of the small tributary of Little Seneca Creek (at the point 'C' on the attached map). Given the existing slope, relocation will have high cost and high impact.

5. The loss of an informal trail in Black Hill Regional Park immediately west of I-270, near Old Baltimore Road.

Cumulative Impacts

Hook up of the Regional Park sewer line to the new WSSC sewer line will result in forest loss. Earth movement during the pipe laying operation will lead initially to some erosion and siltation of Little Seneca Creek that will persist until the situation stabilizes.

Secondary/Cumulative Impacts

1. There is potential for groundwater loss (along the gravel bed of the proposed WSSC sewer system) and subsequent impact on Little Seneca Creek.

2. The project is likely to cause further introduction and spreading of non-native invasive plants into Black Hill Regional Park.

3. The combination of westward widening of Interstate 270 and construction of the proposed sewer line (to WSSC's Crystal Rock Pumping Station) will magnify the impact of forest fragmentation on that part of Black Hill Regional Park.

4. Increased storm water from road widening will impact negatively on fish and macroinvertebrates in Little Seneca Creek (impact is always greatest if storm water management facilities are not properly built).

5. Forest interior dwelling birds (FIDBs), amphibians, reptiles and small mammals, will migrate westward away from new forest edge created by the road widening operations. FIDBs in particular, might become more susceptible to nest predation by species such as raccoons and foxes, and to nest parasitism by brown-headed cow-birds. These predatory species are commonly found along forest edges.

Recommendations

1. Loss of lands from Black Hill Regional Park and North Germantown Greenway should be replaced with equivalent acreage of equivalent natural value, preferably at or near the Ten Mile Creek crossing of the I-270 roadway.SHA and_MTA should coordinate with Montgomery County Department of Park and Planning staff to determine how best to use the opportunity presented by the I-270 project to fulfill a Countywide Park Trails Plan objective for safe, grade-separated trail crossings of the I-270 roadway.

2. Section 4(f) of the U.S. DOT Act should apply for the area.

3. Consideration should be given to having the entire road widening operation confined to the eastern side of Interstate 270, between the main stem of Little Seneca Creek and West Old Baltimore Road (Area "D" on attached map). Among other things, this option will:

    a. Limit all impact of road construction to the less sensitive eastern road R-O-W,

b. Eliminate the need for relocating the tributary of Little Seneca Creek that flows parallel to, and just west of Interstate 270,

c. Result in the loss of fewer acres of forest and,

d. Ensure that there is no loss of wetlands on the western side of I-270.

4. Following from '1' above, part of the Linthicum property immediately east of Interstate 270 should be purchased for road R-O-W. The property should be purchased now while it is still undeveloped and relatively inexpensive. This purchase would accommodate construction staging areas for the Interstate 270 project.

5. In the event that a decision is taken to widen both eastern and western sides of Interstate 270 where it runs between West Old Baltimore Road and Little Seneca Creek, then;

   a. A retaining wall along the western road R-O-W is preferable since it will, among other things, result in the loss of fewer acres of forest;

   b. All storm water management facilities should be located within the less sensitive eastern road R-O-W;

   c. The tributary of Little Seneca Creek will need to be relocated westward. During this operation, care should be taken to maintain the natural stream channel to the extent possible. Piping is not recommended.

3. LITTLE BENNETT REGIONAL PARK

Observations

Little Bennett Regional Park is an important component of the stream valley greenway connecting the Monocacy River watershed in Frederick County to nearby Damascus Recreational Park and the Magruder Branch Stream Valley Park. There are no facilities in the part of Little Bennett Regional Park that will be affected by widening of I-270. The area consists of mixed hardwood forest dominated by sycamore (*Platanus occidentalis*), American beech, white oak, red oak and tulip-poplar. There is an understory of dogwood, red maple and hornbeam, and a shrub layer of blueberry and spicebush. Some multiflora rose (*Rosa multiflora*) is present.

The entire area to be impacted by the proposed I-270 widening is within the stream buffer of either Little Bennett Creek or its tributary (Soper Branch). There is evidence of heavy erosion and channeling from three 14-inch pipes draining the I-270 roadway (shown as 1, 2 and 3 on the attached map), as well as silt deposition into the small tributary of Little Bennett Creek. Erosion control work needs to be initiated in those areas as a matter of some urgency.

There are signs of very high white-tailed deer usage of the area. Also, there is a gas pipeline within the stream buffer on the northern side of the tributary.

Anticipated Impacts to Little Bennett Regional Park

Widening of I-270 and northward relocation of the roadway will have the following environmental and other impacts:

Primary Impacts

1. Loss of 1½ acres of forest and direct stream buffer impact.

2. Possible modification of part of the small tributary to Little Bennett Creek flowing roughly parallel to the I-270 roadway.

3. Stressing of aquatic life (fish and macroinvertebrates) in Little Bennett Creek and its tributary by accelerated silt loads from I-270 roadway storm water.

Secondary Impacts

1. Further introduction and spreading of non-native invasive plants into Little Bennett Regional Park.

Recommendations

1. Lands taken from Little Bennett Regional Park should be replaced with equivalent acreage of equivalent natural value, preferably at or near the Ten Mile Creek crossing of the I-270 roadway. SHA and MTA should coordinate with Montgomery County Department of Park and Planning staff to determine how best to use the opportunity presented by the I-270 project to fulfill a Countywide Park Trails Plan objective for safe, grade-separated trail crossings of the I-270 roadway.

2. Due care should be taken during stream restoration work undertaken in Little Bennett Regional Park given its designation as nontidal wetlands of special State concern (as listed in COMAR 26.23.06.01).

APPENDIX B

FIGURES

The aerial photography source:
- The Montgomery County & Frederick County digital aerial photography was flown in 2005. Mapping provided by SHA.

THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.

MALCOLM KING PARK
HIGHWAY IMPACT
0.75 ACRE

MORRIS PARK
HIGHWAY IMPACT
0.21 ACRE

Malcolm King Park
Morris Park
Morris Park
Christman Park
Summit Hall Park and Historic Property (M21/3)

INTERSTATE 370
INTERSTATE 270

I-270 HIGHWAY
MUDDY BRANCH
MUDDY BRANCH
MUDDY BRANCH
MUDDY BRANCH ROAD
WEST SIDE DRIVE
DEER PARK ROAD
SAM EIG

Brighton West
Deer Park Place
Brighton East
Foxwood
Brighton Highlands

National Institute of Standards and Technology (N.I.S.T.)
CITY OF GAITHERSBURG
WASHINGTONIAN INDUSTRIAL PARK
DEPARTMENT OF HEALTH AND HUMAN SERVICES
SUMMIT HALL ELEMENTARY SCHOOL

W-196W
W-66W
W-65W
H-1
H-2
H-3
B-1
B-2
R-6
R-7
R-8
R-10
R-12
R-16
RW

105 110 115 120 125 130 135 140 145 150

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) (W-#)
- Wetland Area (DNR Nontidal Wetland Areas)
- Existing Right-of-Way
- 2006 ETL Proposed Right-of-Way
- Proposed Retaining Wall
- Proposed General-Purpose Lanes (GPL)
- Proposed Express Toll Lanes (ETL)
- Separate Planning Study
- I-270 Corridor Cities Transitway (Shady Grove to COMSAT)
- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'
0 100' 200' 300' 400' 500' FEET
0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION

MALCOLM KING PARK & MORRIS PARK

EXPRESS TOLL LANES
ALTERNATIVES 6 A/B, 7 A/B

SHA State Highway Administration
MTA Maryland

Figure II-2

K:\projects\197-17\ETL\d\dgn\4f\impacts\d01ETL_4f.dgn

The aerial photography source:
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THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.

POTENTIAL CCT OPERATION/MAINTENANCE FACILITIES

PEPCO LINE

Caulfield

Seneca Creek State Park

SENECA CREEK

SENECA CREEK HIGHWAY IMPACT (SB) 3.56 ACRES

SENECA CREEK CCT IMPACT (SB) 5.16 ACRES

SENECA CREEK HIGHWAY IMPACT (NB) 3.36 ACRES

MIDDLEBROOK HILL PARK HIGHWAY IMPACT 2.13 ACRES

Wetland extends beyond study area

SAINT LACYS CEMETERY

W-GP8 W-GP7 W-102 W-B63W W-190W W-105 W-A63W T-8 W-62 W-62A H-6 R-1 W-189W W-187W W-B61W H-7 T-9 W-188W W-A61W W-183E W-62 W-62C W-61E H-8 10

INTERSTATE 270

SUMMER OAK DR.

ABBOTSFORD CIRCLE

Middlebrook Hill

Middlebrook Hill Park

HIGHPOINT DRIVE

PLUMMER DRIVE

JOHNSBURY LANE

CROWN POINTE CORPORATE CENTER

PFA - County Compliance Area CITY OF GAITHERSBURG

GREAT SENECA CREEK Greenway Trail

N

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
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- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'

0 100' 200' 300' 400' 500' FEET

0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION
SENECA CREEK STATE PARK & MIDDLEBROOK HILL PARK
EXPRESS TOLL LANES ALTERNATIVES 6 A/B, 7 A/B

SHA State Highway Administration | MTA Maryland

Figure II-3

K:\projects\197-17\ETL\d6\dgn\4f-impacts\sd02ETL_4f.dgn

The aerial photography source:
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THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.

BLACK HILL REGIONAL PARK TOTAL IMPACT 8.61 ACRES

BLACK HILL REGIONAL PARK

BLACK HILL REGIONAL PARK HIGHWAY IMPACT 6.64 ACRES

BLACK HILL REGIONAL PARK HIGHWAY IMPACT 0.23 ACRE

BLACK HILL REGIONAL PARK

W-52W

W-51W

W-51W

W-50W

W-53W

Wetland extends beyond study area

Wetland extends beyond study area

Wetland extends beyond study area

INTERSTATE 270

18

ROAD

W-49W

NEWCUT ROAD (PROPOSED)

W-49W

W-52E

NORTH GERMANTOWN GREENWAY HIGHWAY IMPACT 0.78 ACRE

W-54E

H-13

W-OD2

North Germantown Greenway

W-100

W-OD9

H-12

POTENTIAL CCT OPERATION/MAINTENANCE FACILITIES

T-15

BLACK HILL REGIONAL PARK

BALTIMORE

BLACK HILL REGIONAL PARK HIGHWAY IMPACT 1.74 ACRES

W-55E

COMSAT DRIVE

OLD

W-OD3

W-OD4

COMSAT

COMSAT STATION

The Vistas At Milestone

WEST

OBSERVATION DRIVE EXTENDED (PROPOSED)

NEWCUT ROAD (PROPOSED)

GATEWAY CENTER DRIVE EXTENDED (PROPOSED)

PARK AND RIDE FACILITY SUBJECT TO CHANGE; TO BE INTEGRATED WITH FUTURE LAND USE: AREA PROGRAMMED TO ACCOMMODATE 4 BUS BAYS AND 1,000 PARKING SPACES

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) (W-#)
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- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'

0 100' 200' 300' 400' 500' FEET

0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION
BLACK HILL REGIONAL PARK &
NORTH GERMANTOWN GREENWAY
EXPRESS TOLL LANES
ALTERNATIVES 6 A/B, 7 A/B

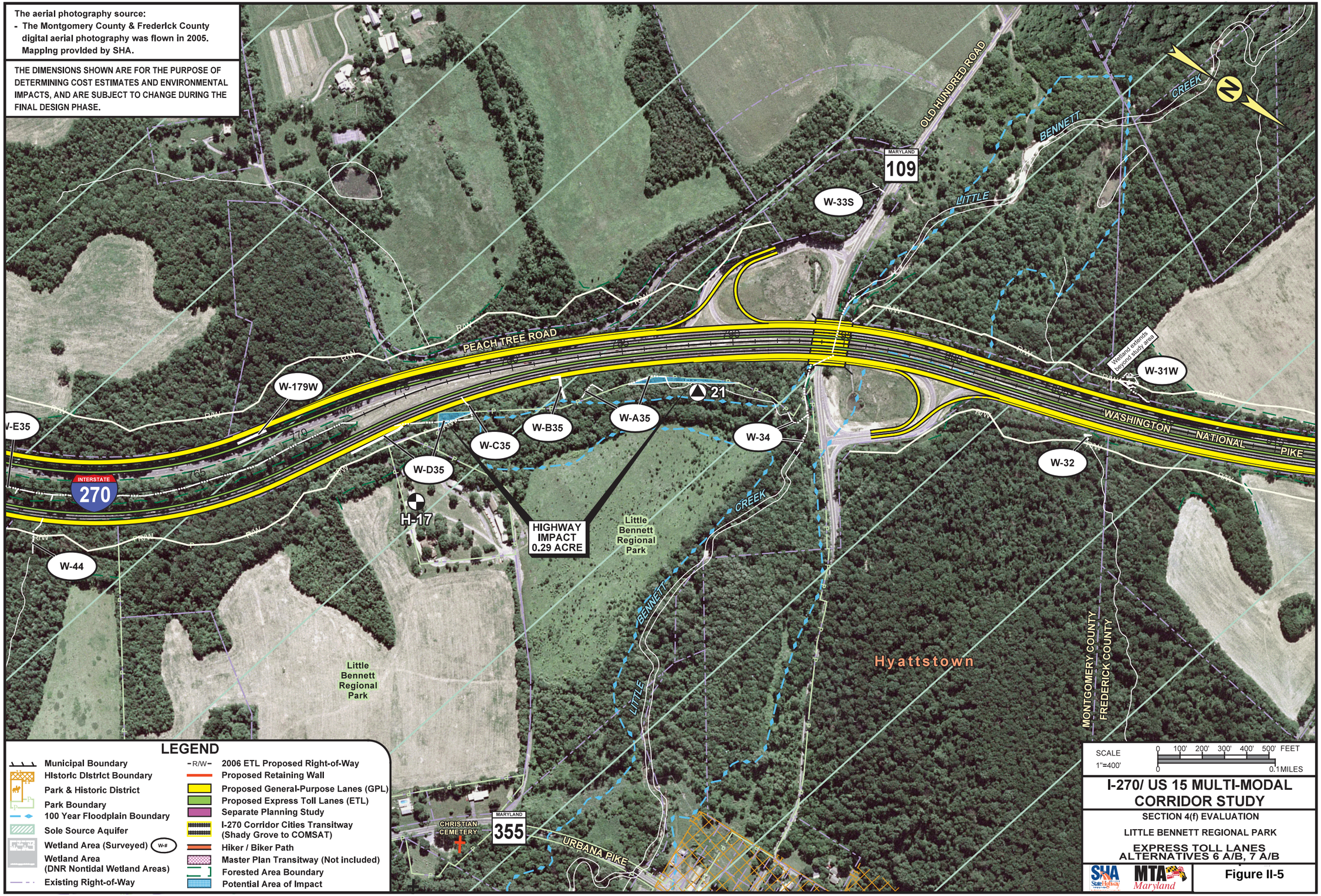
SHA State Highway Administration | MTA Maryland

Figure II-4

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The aerial photography source:
- The Montgomery County & Frederick County digital aerial photography was flown in 2005. Mapping provided by SHA.

THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.



LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) (W-#)
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- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'
0 100' 200' 300' 400' 500' FEET
0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION

LITTLE BENNETT REGIONAL PARK

EXPRESS TOLL LANES ALTERNATIVES 6 A/B, 7 A/B

SHA MTA Maryland

Figure II-5

K:\projects\197-17ETLv8\dgn\4f\impacts\dl0ETL_4f.dgn

The aerial photography source:
- The Montgomery County & Frederick County digital aerial photography was flown in 2005. Mapping provided by SHA.

THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.

Urbana Lake Fish Management Area

HIGHWAY IMPACT 1.23 ACRES

W-27W

W-27E

W-B26W

W-177W

W-A26E

W-174E

W-173E

W-26E

W-176E

W-175E

W-25W

W-25E

W-25E

W-178E

W-24W

W-24

W-24N

W-24E

Wetland extends beyond study area

Wetland extends beyond study area

Wetland extends beyond study area

H-19

N

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) (W-#)
- Wetland Area (DNR Nontidal Wetland Areas)
- Existing Right-of-Way
- R/W 2006 ETL Proposed Right-of-Way
- Proposed Retaining Wall
- Proposed General-Purpose Lanes (GPL)
- Proposed Express Toll Lanes (ETL)
- Separate Planning Study
- I-270 Corridor Cities Transitway (Shady Grove to COMSAT)
- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'

0 100' 200' 300' 400' 500' FEET

0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION

URBANA LAKE FISH MANAGEMENT AREA

EXPRESS TOLL LANES ALTERNATIVES 6 A/B, 7 A/B

SHA State Highway Administration

MTA Maryland

Figure II-6

K:\projects\197-17ETL\6\dgn\4f-impacts\di05ETL_4f.dgn

The aerial photography source:
- The Montgomery County & Frederick County digital aerial photography was flown in 2005. Mapping provided by SHA.

THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.

W-19S
W-20W
W-18W
W-17W
W-19N
W-18E
W-18E
W-20E
H-21
H-22
H-23
H-22
H-23
H-24
MARYLAND 80
MARYLAND 355
INTERSTATE 270
FINGERBOARD ROAD
FINGERBOARD
HIGHWAY IMPACT 1.78 ACRES
HIGHWAY IMPACT 0.44 ACRE
Wetland extends beyond study area
Wetland extends beyond study area
Urbana Community Park
Urbana Overlook
Urbana Historic District (F7/63 to F7/68)
ST. IGNATIUS OF LOYOLA CHURCH
OLD URBANA CHURCH RUINS CEMETERY
URBANA ELEMENTARY SCHOOL
URBANA FIRE AND RESCUE SERVICE
URBANA PIKE
URBANA PIKE
N

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) (W-#)
- Wetland Area (DNR Nontidal Wetland Areas)
- Existing Right-of-Way
- R/W – 2006 ETL Proposed Right-of-Way
- Proposed Retaining Wall
- Proposed General-Purpose Lanes (GPL)
- Proposed Express Toll Lanes (ETL)
- Separate Planning Study
- I-270 Corridor Cities Transitway (Shady Grove to COMSAT)
- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'
0 100' 200' 300' 400' 500' FEET
0 0.1 MILES

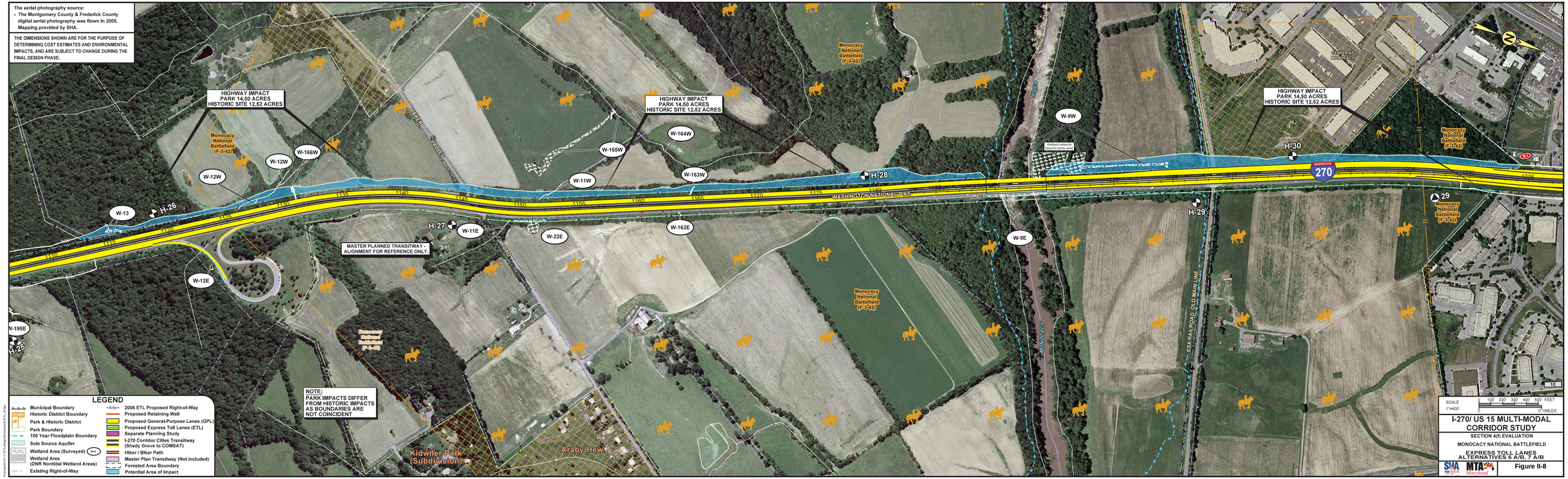
I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION
URBANA COMMUNITY PARK &
URBANA ELEMENTARY SCHOOL
EXPRESS TOLL LANES
ALTERNATIVES 6 A/B, 7 A/B

SHA State Highway Administration
MTA Maryland

Figure II-7

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The aerial photography source:
- The Montgomery County & Frederick County digital aerial photography was flown in 2005. Mapping provided by SHA.
THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.
HIGHWAY IMPACT PARK 14.50 ACRES HISTORIC SITE 12.52 ACRES
HIGHWAY IMPACT PARK 14.50 ACRES HISTORIC SITE 12.52 ACRES
HIGHWAY IMPACT PARK 14.50 ACRES HISTORIC SITE 12.52 ACRES
Monocacy National Battlefield (F-3-42)
Monocacy National Battlefield (F-3-42)
Monocacy National Battlefield (F-3-42)

The aerial photography source:
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Rock Creek Estates
Waterford Park
Wetland extends beyond study area
ROSEMONT AVENUE
Villa Estates
PFA - Municipality
GRANT PLACE
Rosedale Park
BELMONT AVENUE
BLUE RIDGE AVENUE
WEST 7TH STREET
SCHLEY AVENUE
FREDERICK POST OFFICE
SUNRISE ASSISTED LIVING
Waterford
W-7W
31
34
TANEY AVENUE
H-38a
33
15
RW
R-1
BIGGS AVENUE
H-42
35
32
H-38
Fairfield Park
H-39
H-40
Schifferstadt (F3/47)
W-7E
HIGHWAY IMPACT (BAKER PARK) 0.26 ACRE
HIGHWAY IMPACT (SCHIFFERSTADT) 0.09 ACRE
APPLE AVENUE
H-41
FAIRFIELD 128 RESIDENTIAL UNITS APPROVED
Baker Park
CULLER AVENUE
EVERGREEN AVENUE
Apple Park
Max Kehne Memorial Park
H-37
FAIRVIEW AVENUE
CARROLL PARKWAY
CARROLL
Ck.
2ND STREET
Westbrook
Rosedale
PFA - Municipality
City of Frederick Historic District (F3/39)
ST. PETER AND PAUL GREEK ORTHODOX
HOOD COLLEGE

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) (W-#)
- Wetland Area (DNR Nontidal Wetland Areas)
- Existing Right-of-Way
- R/W – 2006 ETL Proposed Right-of-Way
- Proposed Retaining Wall
- Proposed General-Purpose Lanes (GPL)
- Proposed Express Toll Lanes (ETL)
- Separate Planning Study
- I-270 Corridor Cities Transitway (Shady Grove to COMSAT)
- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'
0 100' 200' 300' 400' 500' FEET
0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION

BAKER PARK & SCHIFFERSTADT

EXPRESS TOLL LANES ALTERNATIVES 6 A/B, 7 A/B

SHA State Highway Administration | MTA Maryland

Figure II-9

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The aerial photography source:
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THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.

Antietam Village
HEATHER RIDGE ELEMENTARY SCHOOL
PFA - Municipality
TANEY AVENUE
Applegate
OPOSSUMTOWN PIKE
FREDERICK RESEARCH PARK
HIGHWAY IMPACT ROSE HILL MANOR 0.19 ACRE
HIGHWAY IMPACT ROSE HILL MANOR PARK 1.04 ACRES
W-5W
W-4W
W-4E
W-5E
H-44
H-45
H-46
H-47
36
15
FREDERICK FREEWAY
PINEWOOD DRIVE
Spring Valley
MOTTER AVENUE
OAKWOOD DRIVE
Rose Hill Manor Historic Park
Rose Hill Manor (F-3-126)
PFA - Municipality
GOVERNOR THOMAS JOHNSON HIGH SCHOOL
RW
P
H

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) W-#
- Wetland Area (DNR Nontidal Wetland Areas)
- Existing Right-of-Way
- 2006 ETL Proposed Right-of-Way
- Proposed Retaining Wall
- Proposed General-Purpose Lanes (GPL)
- Proposed Express Toll Lanes (ETL)
- Separate Planning Study
- I-270 Corridor Cities Transitway (Shady Grove to COMSAT)
- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'
0 100' 200' 300' 400' 500' FEET
0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION
ROSE HILL MANOR HISTORIC PARK &
ROSE HILL MANOR
EXPRESS TOLL LANES
ALTERNATIVES 6 A/B, 7 A/B

SHA State Highway Administration
MTA Maryland

Figure II-10

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The aerial photography source:
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THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.

KEY WEST AVENUE
DECOVERLY HALL (NASDAQ) • OFFICE PARK
DIAMONDBACK ROAD
DANAC STATION
GREAT SENECA HIGHWAY
DECOVERLY STATION
W-154
W-155
Decoverly Adventure
SHADY GROVE EXECUTIVE CENTER
OMEGA DRIVE
W-153
Shady Grove Adventist Adult Day Care / Nursing Center
Mission Hills
ALIGNMENT, STATION PROGRAM, AND LOCATION SUBJECT TO CHANGE; TO BE INTEGRATED WITH FUTURE LAND USE DEVELOPMENT
CROWN FARM STATION (FUTURE BEYOND 2025)
CCT IMPACT 3.60 ACRES
WASHINGTONIAN STATION
PFA - County Compliance Area
England/ Crown Farm (M20/17)
PFA - Municipality
WASHINGTONIAN
FIELDS ROAD
CITY OF GAITHERSBURG
INTERSTATE 270
SAM EIG HIGHWAY

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) (W-#)
- Wetland Area (DNR Nontidal Wetland Areas)
- Existing Right-of-Way
- 2006 ETL Proposed Right-of-Way
- Proposed Retaining Wall
- Proposed General-Purpose Lanes (GPL)
- Proposed Express Toll Lanes (ETL)
- Separate Planning Study
- I-270 Corridor Cities Transitway (Shady Grove to COMSAT)
- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'
0 100' 200' 300' 400' 500' FEET
0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION

ENGLAND/CROWN FARM

EXPRESS TOLL LANES ALTERNATIVES 6 A/B, 7 A/B

SHA State Highway Administration | MTA Maryland

Figure II-11

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THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.

N

Washingtonian Woods

MUDDY BRANCH ROAD

Mill Creek South

Belward Farm (M20/21)

CITY OF GAITHERSBURG

Mission Hills

W-211

W-156

Warther

PARK AND RIDE FACILITY SUBJECT TO CHANGE; TO BE INTEGRATED WITH FUTURE LAND USE:
AREA PROGRAMMED TO ACCOMMODATE 7 BUS BAYS AND 250 PARKING SPACES

CCT IMPACT 0.64 ACRE

DECOVERLY STATION

KEY WEST AVENUE

GREAT SENECA SAM EIG HIGHWAY

PFA - County Compliance Area

PFA - Municipality

GREEN PARK

W-155

Decovery Adventure

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) (W-#)
- Wetland Area (DNR Nontidal Wetland Areas)
- Existing Right-of-Way
- 2006 ETL Proposed Right-of-Way
- Proposed Retaining Wall
- Proposed General-Purpose Lanes (GPL)
- Proposed Express Toll Lanes (ETL)
- Separate Planning Study
- I-270 Corridor Cities Transitway (Shady Grove to COMSAT)
- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'

0 100' 200' 300' 400' 500' FEET

0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION

BELWARD FARM

EXPRESS TOLL LANES ALTERNATIVES 6 A/B, 7 A/B

SHA State Highway Administration | MTA Maryland

Date: JULY 2008

Figure II-12

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The aerial photography source:
- The Montgomery County & Frederick County digital aerial photography was flown in 2005. Mapping provided by SHA.

THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.

N

WARING STATION RD

ROAD

Middlebrook Commons

The Colony

W-103

CCT IMPACT 7.87 ACRES

MIDDLEBROOK

MIDDLEBROOK STATION

DEPARTMENT OF ENERGY NRE M:19/41

HIGHWAY IMPACT 2.97 ACRES

W-192W

W-59W

W-60W

MIDDLEBROOK INDUSTRIAL PARK

W-59E

W-60E

Middlebrook

GERMANTOWN STATION

AIRCRAFT DRIVE

GERMANTOWN POLICE STATION

GERMANTOWN FIRE COMPANY #29

Germantown

MARYLAND 118

14

CENTURY BOULEVARD

W-197

W-58W

W-58E

Wetland extends beyond study area

SENECA MEADOWS CORPORATE CENTER INDUSTRIAL PARK; RESIDENTIAL MIXED USE; TDR 5 ACRES)

GERMANTOWN ROAD

INTERSTATE 270

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) (W-#)
- Wetland Area (DNR Nontidal Wetland Areas)
- Existing Right-of-Way
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- Proposed Retaining Wall
- Proposed General-Purpose Lanes (GPL)
- Proposed Express Toll Lanes (ETL)
- Separate Planning Study
- I-270 Corridor Cities Transitway (Shady Grove to COMSAT)
- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'

0 100' 200' 300' 400' 500' FEET

0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION
ATOMIC ENERGY COMMISSION/ DEPARTMENT OF ENERGY
EXPRESS TOLL LANES ALTERNATIVES 6 A/B, 7 A/B

SHA State Highway Administration | MTA Maryland

Figure II-13

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The aerial photography source:
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THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF DETERMINING COST ESTIMATES AND ENVIRONMENTAL IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE FINAL DESIGN PHASE.

PROPOSED US 15 / BIGGS FORD ROAD INTERCHANGE

MASTER PLANNED INTERCHANGE- CONFIGURATION MAY BE MODIFIED AS STUDY PROGRESSES BASED ON FEDERAL/STATE/LOCAL COORDINATION

PROPOSED PARK-AND-RIDE LOT

MEDIAN OPENING TO BE CLOSED

HIGHWAY IMPACT 13.42 ACRES

H-52

H-53

Birely-Roelkey Farmstead (F3/134)

CATOCTIN MOUNTAIN HIGHWAY

MIDDLE RIDGE LANE

BIGGS FORD ROAD

SUNDAYS LANE

TURN STILE LANE

15

N

LEGEND

- Municipal Boundary
- Historic District Boundary
- Park & Historic District
- Park Boundary
- 100 Year Floodplain Boundary
- Sole Source Aquifer
- Wetland Area (Surveyed) W-#
- Wetland Area (DNR Nontidal Wetland Areas)
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- Proposed General-Purpose Lanes (GPL)
- Proposed Express Toll Lanes (ETL)
- Separate Planning Study
- I-270 Corridor Cities Transitway (Shady Grove to COMSAT)
- Hiker / Biker Path
- Master Plan Transitway (Not included)
- Forested Area Boundary
- Potential Area of Impact

SCALE 1"=400'

0 100' 200' 300' 400' 500' FEET

0 0.1 MILES

I-270/ US 15 MULTI-MODAL CORRIDOR STUDY

SECTION 4(f) EVALUATION

BIRELY-ROELKEY FARMSTEAD

EXPRESS TOLL LANES ALTERNATIVES 6 A/B, 7 A/B

SHA State Highway Administration

MTA Maryland

Figure II-14

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