I-270 / US 15 Multi-Modal Corridor Study

Project Correspondence Technical Report

- > Agencies
- > Communities
- > Elected Officials
- Selected 2002 DEIS Agency Correspondence



1. Agency Correspondence



1. Agency Correspondence

Agency Correspondence

DATE	FROM	ТО	SUBJECT	PAGE
2/13/06	DNR	SHA	Finfish species in the project vicinity.	
5/8/06	DNR	SHA	Environmental Review of project.	
9/19/06	USFWS	SHA	Endangered and threatened species in project area.	
10/2/06	USFWS	SHA	Coordination on federally listed or proposed to be listed endangered or threat- ened species in the project area.	
1/22/07	Frederick County Fire & Rescue	SHA	Project impacts on fire and rescue services.	
5/21/07	SHA	M-NCPPC	Coordination on the Park Potomac development.	
6/13/02	Frederick County Dept. of Planning & Zoning	SHA	Historic preservation concerns with the project in Frederick County.	
4/26/04	SHA	MHT	Determination of Eligibility for Bridge Numbers 10078, 10079, and 10080 Finding that no historic properties will be affected by project number FR382B21.	
5/27/04	MHT	SHA	Concur with April 26, 2004 determinations that bridges are ineligible.	
2/12/07	SHA	МНТ	Determinations of Eligibility for historic structures (AEC and 2 wetland mitigation sites) in the project area (with attachments 1, 2, and 4).	
4/13/07	МНТ	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)).	
3/12/07	Frederic County Historic Preserva- tion Commission	SHA	Coordination on historic resources in the vicinity of Wetland Mitigation Areas 19 and 20.	
1/10/08	SHA	MHT	Determination of adverse effect letter (with attachments 2, 3, 4 and 5)	
4/4/2008	SHA	МНТ	Determinations of eligibility of CSX bridges and discussion of Seneca Creek State Park (without attachments)	
6/26/08	МНТ	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.	
6/2/08	SHA	FHWA	Asking them to notify ACHP of adverse effect of project (without attachments).	
1/17/08	SHA	NPS (Ms. Rust)	Determination of adverse effect to Monocacy National Battlefield (with attachments 4 and 5)	
1/17/08	SHA	NPS (Ms. Trail)	Determination of adverse effect to Monocacy National Battlefield (with attachment 3)	
3/18/08	SHA	USDI NPS National Capital Region	Apprising the USDI National Capital Region of adverse effects on Monocacy National Battlefield	
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.	

DATE	FROM	то	SUBJECT	PAGE
3/18/08	SHA	National Park Service — National Capital Region	Forwarding letters sent to MD SHPO, MNB and NHL Philadelphia Region that identify impacts to Monocacy National Battlefield and requesting comments (without attachments)	
2/1/08	Frederick County Landmarks Foun- dation	SHA	Expressing concerns about the impacts to Schifferstadt	
2/25/08	SHA	Frederick County Land- marks Foundation	Response to concerns over impacts on Schifferstadt.	
2/7/08	Frederick County Historic Preserva- tion Commission	SHA	Concurrence with adverse effect determinations; agree to join as consulting party.	
2/8/08	City of Frederick Historic Preserva- tion Commission	SHA	Historic preservation concerns with the project in the City of Frederick.	
2/19/08	Frederick County Parks & Rec.	SHA	Concerns with historic preservation and park impacts to Rose Hill Manor and Historical Park.	
4/17/08	GSA	SHA	Agree to join as consulting party for AEC adverse effect	
6/20/08	SHA	Mr. May - Crown Vil- lage Farm LLC	Requesting consultation regarding adverse effect to England/Crown Farm (without attachments).	
7/22/08	Crown Village Farm, LLC	SHA	Accepting the invitation to be a consulting party.	
6/20/08	SHA	Mr. & Mrs. Thatcher — Birely-Roelkey Farm	Requesting consultation regarding adverse effect to Birely-Roelkey Farmstead (without attachments).	
6/20/08	SHA	Mr. McDonough & Mr. Justus — JHU Belward Farm	Requesting consultation regarding adverse effect to Belward Farm (without attachments).	
6/20/08	SHA	Spring Bank LLC	Requesting consultation regarding adverse effect to Spring Bank (without attachments).	
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.	
6/23/08	SHA	Frederick County Land- marks Foundation	nd- Requesting consultation regarding adverse effect to Schifferstadt	
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).	
7/11/08	FHWA	ACHP	Notifying the ACHP that the project will have an adverse effect on historic properties, and noting the consultation that has taken place to date (without attachments).	
7/29/08	ACHP	FHWA	ACHP will participate in the consultation to develop an MOA.	
9/22/08	Civil War Preserva- tion Trust	SHA	Accepting the invitation to be a consulting party.	



APR-28-2886 89:27 FROM:SHA PPD

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P.275

APR-28-2006 09:27 FROM:SHA PFO

418 209 5004

TO:614109568566

P.3/5



Robert L. Ehrlich, Jr., Governor Michael S. Steele, LL Governor C. Ronald Franks, Secretary

February 13, 2006

Mr. Joseph Kresslein
Project Plasming Division
Maryland Department of Transportation
State Highway Administration
P.O. Box 717
Bultimore, Maryland 21203-0717

Dear Mr. Krusslein:

This letter is in response to your letter of request, dated February 8, 2006, for information on the presence of finfish species in the vicinity of the Maryland Department of Transportation's Project No. FR192B11: I-270 from north of Shady Grove Road to north of Biggs Ford Road in Frederick and Montgomery Counties.

The following streams are in the vicinity of your project area (note that some streams may have two or more reaches managed under different Use classifications). Only the classifications of reaches near your study area have been listed:

WASHINGTON METROPOLITAN AREA SUB-BASIN

Muddy Branch and tributaries (Use I-P)

Long Draught Branch and tributaries (Use I-P)

Great Seneca Creek, unnamed tributaries, and Gunners Branch (Use I-P)

Little Seneca Creek and tributaries (Use IV-P above Little Seneca Lake)

Little Seneca Lake, unnamed tributaries, Cabin Branch, and Teamile Creek (Use I-P)

MIDDLE POTOMAC RIVER SUB-BASIN

Little Bennett Creek, urnamed tributaries, Sopers Branch and Wildest Branch (Use III-P for Little Bennett Creek mainstern upstream of MD 355 and tributaries entering this reach; Use I-P for Little Bennett Creek mainstern downstream of MD 355 and tributaries entering this reach).

Bennett Creek, unnamed tributaries, Urbana Branch, and North Branch (Use I-P).

Monocacy River (below US 40), unnamed tributuries to this reach of the Monocacy River, Tabler Run and Bush Creek (Use I-P).

Ballenger Creek, unnamed tributuries, and Pike Branch, King Branch, Arundel Branch, Quarry Branch (Use III-P).

Critroll Creek, unnamed tributaries, and Rook Creek (Use III-P for Carroll Creek mainstern downstream of US 15 and tributaries entering this reach).

Monocacy River (above US 40) and unnamed tributaries to this reach of the Monocacy River (Use IV-P).

Tuscarora Creek, unramed tributaries, and Little Tuscasrora Creek (Use III-P). Glade Creek (Use IV-P).

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410.260.8DNR or toll free in Maryland 877,620.8DNR • www.dnr.maryland.gov • "T"Y users call via Maryland Relay

Generally, no instream work is permitted in Use 1 streams during the period of March 1 through June 15, inclusive, during any year. No instream work is permitted in Use III streams during the period of October 1 through April 30, inclusive, during any year. No instream work is permitted in Use IV streams during the period of March 1 through May 31, inclusive, during any year.

Of the streams listed above, Little Tuscarora Creek and tributaries to upper reaches of Tuscarora Creek support self-sastaining wild populations of brook trout upstream from US 15. Ballenger Creek supports a self-sustaining wild population of brown trout in reaches upstream from I-270. Little Bennett Creek supports wild and stocked brown trout in reaches upstream from I-270. Individual trout may be present in the lower reaches of these streams from time to time.

Adult rainbow front are stocked by the State for recreational fishing in Lake Needwood (on Rock Creek), Great Seneca Creek downstream from I-270, Urbana Lake (on a tributary to Bennett Creek), and Carroll Creek in the vicinity of US 15.

Populations of warmwater gamefish that provide notable recreational fisheries can be found in Lake Needwood, Great Seneca Creek, Little Seneca Lake, Urbana Lake, and the Monococy River. Gamefish species that may be found in one or more of these areas include largemouth bass, smallmouth bass, various sunfish species, catfish, and tiger musicy.

The perennial portions of the streams in your study area also support resident populations of non-game fish species. Tables IV-2 and V-2 (attached) list fish species documented by our Pisheries Service in the Middle Potomac River sub-basin and the Washington Metropolitan Area sub-basin, respectively. Many of these species could be found in the streams listed for your study area.

Anadromous fish species do not access any of the streams in your study area due to the presence of natural barriers located downstream. The spawning periods for the fish species likely to reside and spawn near your project site will be adequately protected by the instream work prohibition periods mentioned above and by sediment and erosion control methods and other Best Management Practices typically used for the protection of stream resources.

If you have any questions concerning these comments, you may contact me at 410-260-8331.

Sincerely,

Ray C. Dentaman, Jr., Director Environmental Review Unit

RCD Attachment

2



Tobte 1v-2.: Fish Species Collected in the Hiddle Porosuc River Busto, 1974-1984.

Salmonidae	
Brook trout	Selvelinus fontinelis (Mitchill)
Brown trout	Salmo trutto Linnanus
Roinbow crout	Salmo gairdneri Richardson
Cyprinidae	Name of the second
Sconeroller	Compostoma annualum (Refinesque)
Diocknose dace	Rhinichthys atratulus (Hormonn)
Longnose dace	Rhinichthys cataractse (Valenciennes
Cutlips minnov	Exoglossum maxillingua (Lesueur)
Creek chub	Senotilus atronsculatus (Mitchill)
River chub	Nocomis micropogon (Cope)
Fellfish	Semotilus corporalis (Mitchill)
Rosyside duce	Clinostonus' funduloides Girard
Common shiner	Motropis cornutus (Mitchill)
Bluntnose minnov	Piniplahes notatus (Rafinesque)
* Peal dace	Semotilus margerita (Cope)
Catostomidae	SALES STATES
Morthern hogsucker	Hypentelium nigricans (Lesueur)
White sucker	Catostonus consersoni (Lacepade)
Ictaluridan	
Murgined madtom	Moturus insignia (Richarson)
Brown bullhead	Ictalurus nebulosus (Lesueur)
Cottidne	
Mottled sculpin	Cottus heirdi Girard
Centrarchidae	Access to the second se
Rlwogill sunfish	Lepomis macrochirus (Rafinesque)
Smallmouth bass	Micropterus dolomieui Lacepede
fargomouth bass	Micropterus salmoides Lacepede
Rock bass	Ambloplites rupestris (Rafinesque)
Pumpkinseed aunfish	Leponis gibbosus (Linnaeus)
Longeur sunfish	Lepomis megalotis (Rafinesque)
Percidse	The state of the s
Tessellated darker	Etheostoma olmstedi Storer
Greenside durter	Etheostoma blennioides Rafinesque
Fantail darter	Etheostoma flabellare Rafinesque
Anguillidue	
American sel	Anguilla rostrata (Lesueur)

a Additional fish species collected, 1980-1984.

Table V-2. Fish Species Collected in the Washington Notropolitan Area Bharay 1974 through 1984. (New species collected in 1980 to 1984 study designated by *.)

And the second second	
Salmonidae	
Brook trout	Salvelinus fontinalis (Mitchill)
Brown trout	Salmo trutta Linnaeus
Rainbow trout	Salmo gairdneri Richardson
Cyprinidae	
Stoneroller	Compostoma soomalum (Rafinesque)
Blacknose dace	Rhinichthys atratulus (Hermann)
Longnose dace	Rhinichthys cataractae (Valencienne
Cutlips minnow	Excelossum maxillingum (Lesueur)
Creek chub	Senotilus atronsculatus (Mitchill)
River chub	Nocemia micropogon (Cope)
Fallfish	Semotilus corporalis (Mitchill)
Rosyside dace	Clinostomus funduloides Girard
Common shiner	Notropis cornutus (Mitchill)
Bluntnose minnow	Pimephales sototus (Refinesque)
Colden shiner	Notesigonus crysoleucas (Mitchill)
Spotfin shiner	Notropis spilopterus (Cope)
Spottail shiner	Notropis hudsonius (Clinton)
Silverjay minnov	Ericymba buccata Cope
Swallowtail shiner	Notropis protne (Cope)
Satinfin shiner	Notropis analostanus (Mitchill)
Catoscomidse	
Northern hogsucker	Hypentelium migricans (Lesueur)
White sucker	Catostonus conmersoni (Lacepede)
Croek chubaucker	Erimyzon oblongum (Mitchill) *
lctoluridoe	
Margined madtom	Noturus insignis (Richardson)
Brown bullhead	Ictalurus nebulosus (Lesueur)
Yellow bullhead	Ictalurus natalis (Lesueur)
Cottidae	Service Committee Committe
Mottled sculpin	Cottus beirdi Girard
Percidae	
Tessellated darter	Etheostona olmstedi Storer
Greenside darter :	Etheostoma blennioides Rafinosque
Fentail darter	Etheostoma flabellare Rafinesque
Centrarchidae	[: [: [: [:]]] [:] [:] [:] [:] [
Bluegill sunfish	Lepomis macrochirus (Rafinesque)
Smallmouth bass	Micropterus dologieui Lacepede
Largemouth bass	Micropterus salmoides (Lecepade)
Greenside sunfish	Lepomis cyanellus Rafinesque
Pumpkinseed sunfish	Lepomis gibbosus (Linnasus)
Red breasted sunfish	Lepomis auritis (Linnaeus)
Rock bass	Ambloplites rupestris (Rafinesque)
Anguillidae	444 mark===4444;==44, 10 44
American eel	Anguilla rostrata (Lasueur)

V-



MAY-15-2006 12:44 FROM: SHA PPD

418 289 5884

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P.2-5

MAY-15-2006 12:44 FRON: SHA PPD

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P.3/5

ATURAL RESOURCES

Robert L. Ehrlich, Jr., Governor Michael S. Steele, Lr. Governor C. Ronald Franks, Secretary

May 8, 2006

Mr. Bruce M. Grey State Highway Administration Maryland Department of Transportation 707 North Calvert Street Baltimore, MD 21202

RE: Environmental Review for Project No. FR192B11, I-270: from North of Shady Grove Read to North of Biggs Ford Road, Frederick and Montgomery Countles, Maryland.

Dear Mr. Grey:

The Wildlife and Heritage Service has determined that there is a Bald Eagle nest known to occur within the study area as delineated. The bald eagle is listed as a threatened species by the state and the federal government. State law requires that appropriate protection measures be incorporated into actions by state agencies. The approximate location of the eagle nest is indicated on the attached map. To protect this nest site the following guidelines should be implemented:

- Establish a protection area of 1/4 mile radius around the nest tree. Within this area, establish three zones of protection: Zone 1 extends from the nest tree to a radius of 330 feet, Zone 2 extends from 330 feet to 660 feet in radius, and Zone 3 extends from 660 feet to 1/4 mile (1320 ft.)
- No land use changes, factuding development or timber harvesting should occur in Zone 1.
- Construction activities, including clearing, grading, building, etc., should not occur within Zones 1 and 2 and ideally no closer than 750 feet from the nest.
- No construction or timber harvesting activities should occur within the 1/4 mile protection zone during the eagle nesting season, which is from December 15 through June 15.

These general guidelines are used by our biologists for baid eagle nest site protection. Specific protection measures depend on the site conditions, planned activities, nest history and other factors. For more specific technical assistance regarding your project relative to bald eagle protection contact the WHS.

Also within the study area is a site known as Germantown Bog, which is located in between I-270, Route 27, Route 118 and Route 355 in the Germantown area. This wetland is designated in state regulations as a Nontidal Wetland of Special State Concern (NTWSSC) and regulated by Maryland Department of the Environment. This wetland and its adjacent 100' upland buffer are regulated as an NTWSSC. Your project may need to be reviewed by Maryland Department of the Environment for any necessary wetland permits associated with the NTWSSC.

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This bog habitat is known to support:

Scientific Name	Common Name	State Status
Carex buxbaumil	Buxbaum's Sedge	Threatened
Sanguisorba canadensis	Canada Burnet	Threatened
Spenophilis pensylvanica	Swamp-cats	Threatened

Another site known to support RT&E species is a site known as Travilah Woods which is located in between Travilah Road, Shady Grove Road, Damestown Road and Piney Meetinghouse Road in the Gaithersburg area. This serpentine barren habitat is known to support state-listed endangered Potato Dandelion (Krigia dandelion).

There is another site known as Hoyles Mill Diabase Complex which is located along Clopper Road/Route 117 and is known to support the following RT&E species:

Scientific Name	Common Name	State Status
Juglans cinerea	Butternut	Rare
Gentiana andrewsti	Fringe-tip Closed Gentian	Threatened
Carex meadii	Mead's Sedge	Endangered
Polygala senega	Seneca Snakeroot	Threatened
Papilia cresphontes	Giant Swallowtail	In Need of Conservation
Zanthoxylum americanum	Northern Prickly-ash	Endangered
Scirpus verecundus	Bushful Bulrush	Rare
Scutellaria nervosa	Veined Skullcap	Endangered
Phlox glaberrima	Smooth Phlox	Endangered
Krigia dandelion	Poteto Dandelion	Endangered
Quercus shumardit	Shumard's Onk	Threatened
Melica mutica	Narrow-leaved Mellograss	Threatened
	경기 이번 사람들은 그림드라면 모든 사람이 그렇지요 없었다.	

There is a site known as Chick Road Springs that is located between the C&O Canal National Historic Park, Route 28 and Nolands Road in the Tuscarors area within the study area. This spring habitat is known to support the Roundtop Amphipod (Stygobromus sp. 14) and the Pizzini's Amphipod (Stygobromus pizzinii), both state rare subterranean invertebrate species. There is also a site along Mouth of Monocacy Road near the Frederick/Montgomery County Line that is known as Monocacy Spring that also is known to support these two subterranean invertebrates.

The site known as Nolands Ferry Floodplain which is located along the Potomac River is known to support the following RT&E species:

Scientific Name	Common Name	State Status
Overeus shumardii	Shumard's Oak	Threatened
Carex davisti	Davis' Sedge	Endangered
Agalinis auriculata	Auricled Gerardia	Endangered
		2072070

Our analysis of the information provided suggests that the forested area on or adjacent to the study area contains Forest Interior Dwelling Bird habitat. Populations of many Forest Interior Dwelling Bird Species (FIDS) are declining in Maryland and throughout the eastern United States. The conservation of FIDS habitat is strongly encouraged by the Department of Natural Resources. The following guidelines will help minimize the project's impacts on FIDS and other native forest plants and wildlife:

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MAY-15-2006 12:44 FROM: SHA PPD

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P.4/5

Page 3 May 8, 2006

- Avoid placement of new roads or related construction in the forest interior. If forest loss or disturbance is absolutely unavoidable, restrict development to the perimeter of the forest (i.e., within 300 feet of the existing forest edge), and avoid road placement in areas of high quality FIDS habitat (e.g., old-growth forest).

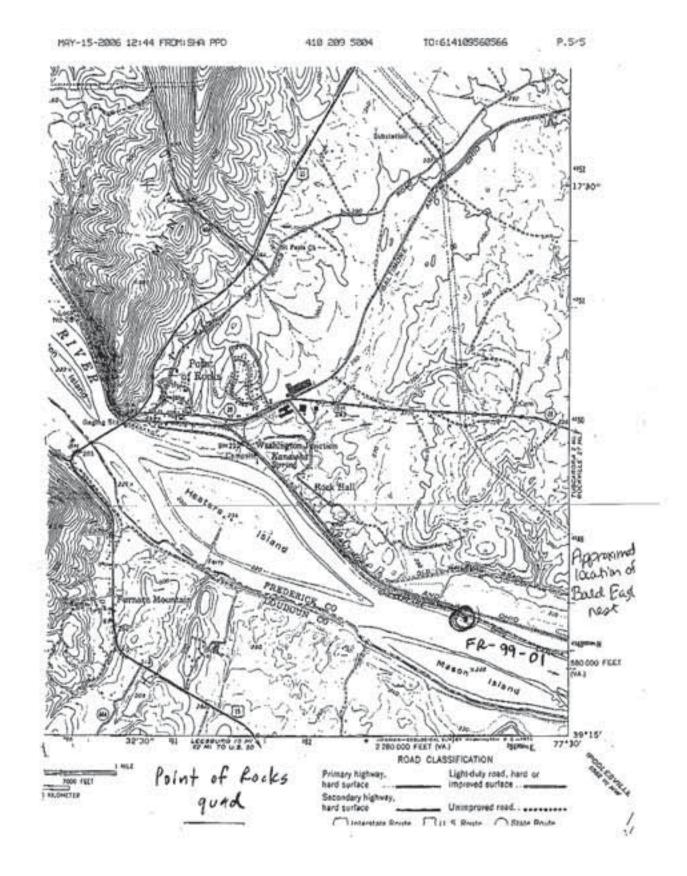
 Maximize the amount of remaining contiguous forested habitat.
- Do not remove or disturb forest habitat during May-August, the breeding season for most FIDS. This seasonal restriction may be expanded to February-August if certain early nesting FIDS (e.g., Barred Owl) are present.
- Maintain forest habitat as close as possible to the road, and maintain canopy closure where possible.
- Maintain grass height at least 10° during the breeding season (May-August).

Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at (410) 260-8573.

Lori A. Byrne, Environmental Review Coordinator Wildlife and Heritage Service MD Dept, of Natural Resources

#2006.0371.ft/mo R. Dintaman, ERU

D. Brinker, WHS



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United States Department of the Interior



FISH AND WILDLIFE SERVICE Chesapeake Bay Field Office 177 Admiral Cochrane Drive Annapolis, MD 21401

September 19, 2006

State Highway Administration Maryland Department of Transportation 707 North Calvert Street Baltimore, Maryland 21202

ATTN: Mary F. Barse

RE: Project No. FR 192B11 I-270 from North of Shady Grove RD Frederick and Montgomery Counties MD

Dear Ms. Barse

This responds to your letter, received June 20, 2006, requesting information on the presence of species which are federally listed or proposed for listing as endangered or threatened within the vicinity of the above referenced project area. We have reviewed the information you enclosed and are providing comments in accordance with section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

Except for occasional transient individuals, no federally proposed or listed endangered or threatened species are known to exist within the project impact area. Therefore, no biological assessment or further section 7 consultation is required with the U.S. Fish and Wildlife Service. Should project plans change, or if additional information on the distribution of listed or proposed species becomes available, this determination may be reconsidered.

This response relates only to federally protected threatened or endangered species under our jurisdiction. It does not address the Service's concerns pursuant to the Fish and Wildlife Coordination Act or other legislation. For information on the presence of other rare species, you should contact Ms. Lori Byrne of the Maryland Heritage and Wildlife Division at (410) 260-8573.

We appreciate the opportunity to provide information relative to fish and wildlife issues, and thank you for your interest in these resources. If you have any questions or need further assistance, please contact Devin Ray at (410) 573-4531.

Sincerely,

Mary J. Ratnaswamy, Ph.D.

Program Supervisor, Threatened and Endangered Species



410 209 0832

Fax Line

03:25:05 p.m. 10-02-2006 22/23

410 260 0832

Fax Line

03:25:20 p.m. 10-02-2005 23



United States Department of the Interior

FISH AND WILDLIFE SERVICE Chesapeake Bay Field Office 177 Admiral Cochrane Drive Annapolis, MD 21401

October 2, 2006

Mr. Bruce M. Grey Deputy Director Office of Planning and Preliminary Engineering State Highway Administration P.O. Box 717 Baltimore, MD 21203-0717

RE: Project No. FR192B11 1-270: From North of Shady Grove Rd to North of Biggs Ford Rd. Frederick and Montgomery Counties, MD

Dear Mr. Grey:

This responds to your letter, received , September 28 2006, requesting information on the presence of species which are federally listed or proposed for listing as endangered or threatened within the vicinity of the above referenced project area. We have reviewed the information you enclosed and are providing comments in accordance with section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

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We appreciate the opportunity to provide information relative to fish and wildlife issues, and thank you for your interest in these resources. If you have any questions or need further assistance, please contact Devin Ray at (410) 573-4531.

Sincerely,

Mary Ratneswamy Mary J. Ratnaswamy, Ph.D.

Program Supervisor, Threatened and Endangered Species



Jan 22 07 05:05p

Fire Rescue

301-694-2592

p. 1



COMMISSIONERS

Provident

David F. Gray Vine President

Kni J. Hagen. Charles A. Jozkins

John L. Thompson, In.

FIRE AND RESCUE

Walter P. Museny Director Phone 301-600-3467 Fax 301-600-3467

Watern E. Stevens Deputy Director Phone 301-600-6905 Fax 391-600-6467

COMMUNICATIONS Phose 351-500-1503 Fea 301-500-4037

> OPERATIONS Floor 301-600-1479 For 301-606-2592

EMBRGENCY MANAGEMENT Phone 301-600-1740 Fax 240-625-6105

TRAINING Phowe 301-500-2282 Pas 301-610-2284

SUPPORT SERVICES Phote 301-600-2507 Ptx 301-600-3465



FIRE AND RESCUE SERVICES DIVISION FREDERICK COUNTY, MARYLAND

340 Montevue Lane Frederick, Maryland 21702-8214 www.co.frederick.md.us TDD 301-600-1672

January 22, 2007

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

Re: Project No. FR192B11 I-270/US 15: from South of Shady Grove Road To North of Biggs Ford Road Frederick and Montgomery Counties, Maryland

Dear Mr. Grey:

In response to your letter of December 20, 2006, regarding the above project, the Division of Fire and Rescue Services has the following concerns:

- If, during the improvements, permanent concrete structures are erected to divide the North and Soutabound lance, we would certainly request consideration on emergency vehicle access to and from the same.
- With regard to the closure of at-grade intersections at various locations, we would hope that the proposed interchanges would be in place before the intersections are closed, i.e., Hayward Road and Willow Road.

Thank you very much for the opportunity to comment on this Project. Should you wish to contact me, I can be reached at (301) 600-2035, or (240) 674-4778.

Sincerely,

Douglas W. Brown, Battalian Chief Frederick County DFRS

DWB:cjw

ec: Marc B. McNeal, Bureau Chief of Operations Warren E. Stovens, Deputy Director



John D. Purcuri, Secretary Neil J. Pedecsen, Administrati

Maryland Department of Transportation

May 21, 2007

Montgomery County I-270 General File Park Potomac

Mr. Shahriar Etemadi Transportation Coordinator M-NCPPC 8787 Georgia Avenue Silver Spring, Maryland 20910

Dear Mr. Etemadi:

Thank you for the opportunity to review the Traffic Impact Study Report by The Traffic Group, Inc. dated April 11, 2007 (received by the EAPD on April 23, 2007) that was prepared for the proposed Park Potomac mixed-use development in Montgomery County, Maryland. The major report findings and the Maryland State Highway Administration (SHA) comments and conclusions are as follows:

- Access to the development that includes 570,000 square feet of Office Development, 145,000 square feet of Retail Development, 450 Condominium Units, 150 Townhouse Units, and a 156-room Hotel is proposed from one (1) grade separated interchange on Montrose Road and one (1) full movement site access driveway on Seven Locks Road (both County roadways).
- The traffic consultant included funded County widening improvements along Montrose Road and a westbound Tuckerman Road left turn lane improvement funded by the Montgomery Mall at the Seven Locks Road at Tuckerman Road intersection.
- The traffic consultant determined that the proposed development would negatively impact the Tower Oaks Boulevard at Montrose Road and Seven Locks Road at Tuckerman Road intersections. Therefore, the following mitigating roadway improvements were proposed:

Street Address: 707 North Calvert Street - Bultimore, Maryland 21202 - Phone: 410.545.0300 - www.marylandroads.com

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Mr. Shahriar Etemadi Page 2 of 2

- Tower Oaks Boulevard at Montrose Road Modify southbound Tower Oaks Boulevard approach from the existing 2 left turn lanes and 1 right turn lane –to- 1 left turn lane, 1 left/right lane, and 1 right turn lane.
- Seven Locks Road at Tuckerman Road Widen northbound Seven Locks Road approach to provide exclusive right turn lane.
- As previously requested by SHA, the weaving section between I-270 and the Site Access Drive along Montrose Road was examined. The roadway section was determined to function adequately with the proposed development traffic.

SHA concurs with the proposed improvements at the intersections identified above to mitigate the site traffic impact. Therefore, SHA recommends that the M-NCPPC condition the applicant to design and construct the roadway improvements identified above. SHA also recommends that the M-NCPPC condition the developer to reserve enough right-of-way to facilitate the ultimate I-270 configuration. SHA's Project Planning Division's February 7, 2007 comments and mapping for the I-270 Express Toll Lane (ETL) Feasibility Study is attached.

Unless specifically indicated in SHA's response on this report, the comments contained herewith do not supersede previous comments made on this development application. If there are any questions on any issue requiring a permit from SHA on this application, please contact Raymond Burns at (410) 545-5592 or rburns1@sha.state.md.us. If you have any questions or comments regarding the enclosed traffic report comments, please contact Larry Green at (410) 995-0090 x20.

Sincerely,

Steven D. Foster, Chief

Engineering Access Permits Division

Mr. Ed Axler, M-NCPPC Montgomery County

Mr. Raymond Burns, SHA EAPD

Mr. Robert French, SHA Office of Traffic & Safety

Mr. Larry Green, Daniel Consultants, Inc.

Mr. Wes Guckert, The Traffic Group, Inc.

Mr. Morteza Tadayon, SHA Travel Forecasting Section

Mr. Errol Stoute, SHA Traffic Development & Support Division

VIKA Inc. / 20251 Century Boulevard, Suite 400, Germantown, Maryland 20874

MinBus Waite Sura Office of Planning and Preliminary Engineering

Mr. Jeff Wentz, SHA District 3 Office



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

1270/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 idavis@fredco-md.net.

Yours very truly,

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



State Highway

Robert L. Ehrlich, Jr., Governor Michael S. Steele, Lt. Governor Robert L. Flanagan, Secretary Nell J. Pederson, Administrator

MARYLAND DEPARTMENT OF TRANSPORTATION

April 26, 2004

Re:

Project No. FR382B21 1-270, Bridge Nos. 10078, 10079, 10080 Frederick County, MD USGS Urbana Quadrangle

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 our finding that no historic properties would be affected by proposed Project No. FR382B21 and that the three referenced bridges are not eligible for the National Register of Historic Places (NRHP). The project consists of replacing or re-decking these three bridges on I-270. Bridge No. 10078 (I-270 over MD 80) would be replaced and Bridge No. 10079 (I-270 over Bennett Creek) and Bridge No. 10080 (I-270 over Dr. Perry Road) would have deck replacements. No outside widening is planned and no right-of-way impacts are anticipated at this time. The planned improvements for these bridges are consistent with the I-270/US 15 Multi Modal Planning Study. A project location map is included as Attachment 1 and the Urbana Quadrangle with historic properties noted is provided as Attachment 2.

Bridge No. 10078 on I-270 over MD 80 is a dual span steel beam bridge built in 1950. The proposed replacement structure will be either a steel or concrete girder bridge with two 12-foot lanes, a 10-foot outside shoulder and a 17-foot inside shoulder. The length of the bridge will be approximately 106 feet, which will accommodate the future widening of MD 80 to six lanes under the bridge. The existing profile of I-270 may be raised or MD 80 may be lowered in order to provide increased clearance.

Bridge No. 10079 on I-270 over Bennett Creek is a one span steel beam bridge built in 1950. The existing deck is deteriorated. The proposed structure will have a typical section consisting of two 12-foot lanes, a 10-foot outside shoulder and a 17-foot inside shoulder. The structure will require substructure rehabilitation work and the beams will be painted.

My telephone number/tell-free number is

Maryland Belay Service for Impaired Hearing or Speech: 1.800.735.2258 Statewide Tall Free

Street Address: 707 North Calvert Street Baltimore, Maryland 21202 Phone: 410.545.0800 www.marylandroads.com

Mr. J. Rodney Little I-270, Bridge Nos. 10078, 10079, 10080 Page Two

Bridge No. 10080 on I-270 over Dr. Perry Road is a dual span, steel beam bridge built in 1950. The existing deck is deteriorated. The proposed structure will have a typical section consisting of two 12-foot lanes, a 10-foot outside shoulder and a 17-foot inside shoulder. This structure will require some substructure rehabilitation work and the beams will be painted. All of the bridges will be widened into the existing I-270 median in order to maintain two lanes of traffic during construction.

Funding

Federal funds will be used for this project.

Area of Potential Effects

The area of potential effects (APE) for this project is defined as the area of direct construction impacts as well as areas into which the project would likely introduce elements that would affect characteristics that qualify resources for inclusion in the NRHP should these changes constitute major departures from the existing conditions. Because all of the improvements and changes relate to a major transportation facility (I-270) that has transformed the landscape, there is little potential that the proposed alterations to I-270 in the form of bridge replacements and/or re-deckings would introduce changes in the conditions and physical settings of historic properties that are significantly different from the current situation, or would affect historic characteristics and the integrity of historic properties. The APE is confined to the bridge structures themselves and the immediate environs within the existing right-of-way. The APE also includes I-270 where the bridges are located, as indicated on the attached Urbana USGS quadrangle map (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 deck or bridge replacements along I-270 in Frederick County.

Architecture: SHA Architectural Historian Rita M. Suffness consulted the historic sites inventory maintained by the MHT, SHA-GIS Cultural Resources Database, quadrangle mapping and project files. There are no previously identified historic resources within the APE. Potentially historic standing structures that are at least fifty years old have been identified within the APE. These are: Bridge No. 10078 (I-270 over MD 80), Bridge No. 10079 (I-270 over Bennett Creek) and Bridge No. 10080 (I-270 over Dr. Perry Road), all built in 1950. None of these bridges is considered eligible for the NRHP because each lacks integrity, adequate historical association, or the necessary architectural or engineering distinction to meet the criteria for eligibility. These findings are documented in the Determination of Eligibility Forms provided in Attachment 3.



Mr. J. Rodney Little I-270, Bridge Nos. 10078, 10079, 10080 Page Three

Archeology: SHA Archeologist Mary Barse assessed the archeological potential of the referenced project based on review of the SHA-GIS Cultural Resources Database. Bridge No. 10078 over MD 80 at Urbana is proposed for replacement. There are no recorded archeological sites in the project area. The MD 80 southwestern approach to the I-270 overpass was previously surveyed by Curry (1978), but his investigation did not extend to the bridge itself. However, the APE has been disturbed by previous construction of I-270 and the I-270/MD 80 interchange. It is not likely that intact areas are present in existing SHA right-of-way. No further archeological investigations are recommended for the replacement of Bridge No. 10078 over MD 80.

Bridge No. 10079 crosses Bennett Creek and is slated for a deck replacement. The project area was covered by two prior surveys, with Ballweber (1988) covering the western stream bank, and Wesler et. al. (1981) covering the eastern bank. One previously recorded archeological site, 18FR746, is located in the general vicinity, but outside the APE. Replacement of the bridge deck would cause no new ground disturbance and is unlikely to impact any intact, significant archeological resources. No further archeological work is recommended for Bridge No. 10079 based on the current project scope.

Bridge No. 10080 over Dr. Perry Road is slated for a deck replacement. There are no recorded archeological sites in the project area, nor has it been previously surveyed. Replacement of the bridge deck would cause no new ground disturbance, and is unlikely to impact any intact, significant archeological resources. No further archeological work is recommended for Bridge No. 10078 based on the current project scope.

Review Request

Please examine the attached maps, plans, and Eligibility and Effects Table (Attachment

4). We request your concurrence by May 27, 2004 that there would be no historic properties
affected by this project and that the three bridges are not eligible for the NRHP. By carbon copy,
we invite the Frederick County Historic Preservation Commission, 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.aclp.gov, or
contact the Maryland State Highway Administration or the Maryland Historical Trust.). If no
response is received by May 27, 2004, we will assume that these offices decline to participate.

Mr. J. Rodney Little I-270, Bridge Nos. 10078, 10079, 10080 Page Four

Please call Ms. Rita M. Suffness at 410-545-8561 (or email rsuffness@sha.state.md.us) with questions regarding standing structures for this project. Ms. April Fehr may be reached at 410-545-8848 (or email afehr@sha.state.md.us) with concerns regarding archeology.

Very truly yours,

Cynthia D. Simpson Deputy Director Office of Planning and Preliminary Engineering

by:

Bruce M. Grey Deputy Division Chief Project Planning Division

Attachments: 1) Project Location Map

- USGS Urbana Quadrangle Map with Inventoried Resources and APE Indicated
- 3) Determination of Eligibility Forms

4) Eligibility/Effects Table

cc: Ms. Mary F. Barse, SHA-PPD

(w/Attachment 4) (w/Attachment 3)

Ms. Anne Bruder, SHA-PPD

Ms. Danelle Bernard, SHA-OBD (w/Attachment 4)

Mr. Ray Compton, Frederick County Historical Trust, Inc (w/Attachments)

Ms. Janet Davis, Frederick County Historic Preservation Commission (w/Attachments)

Ms. Anne Elrays, SHA-PPD

Ms. April Fehr, SHA-PPD

(w/Attachments 1-4) (w/Attachments)

Mr. Gary Green, SHA-PPD

Ms. Cynthia D. Simpson, SHA-OPPE

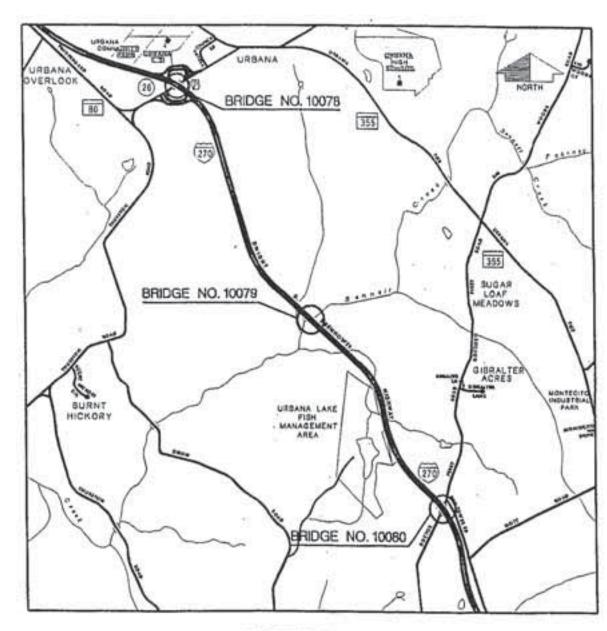
Mr. Donald H. Sparklin, SHA-PPD

Ms. Rita Suffness, SHA-PPD

(w/Attachments 1-2, 4)



Attackment 1



FREDERICK COUNTY

SCALE : 1"=2000'

Mr. J. Rodney Little I-270, Bridge Nos. 10078, 10079, 10080 Page Five

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

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Project Number: Project Name: County:		FR382B21				
		I-270. Bridge Nos. 10078, 10079, 10080				
		Frederick				
Letter Date	¢	April 26, 2004				
The Marylar and concurs	nd Histo with the	rical Trust has revie mD State Highwa	ewed the documentation attached to the referenced letter y Administration's determinations as follows:			
Eligibility (as noted	in the Eligibility T	able [Attachment 4]):			
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Effect (as n	oted in t	he Effects Table [A	ttachment 4]);			
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Return by U.S. Mail or Facsimile to:

Mr. Bruce M. Grey, Deputy Division Chief, Project Planning Division,
MD State Highway Administration, P.O. Box 717, Frederick, MD 21203-0717
Telephone: 410-545-8540 and Facsimile: 410-209-5004



Martin O'Malley, Governor Anthony Breen, Lt. Governor John D. Perceri, Scoretary Designate No. 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.

My telephone uumbentoli-free cumber ta Maryland Being Service for Jugained Hearing or Speech 1,800,756 2228 Statewide Tell Free Street Address: 707 North Culvert Street + Baltimore, Maryland 21202 + Fitour 410.545.0805 + www.marylandroads.com

Mr. J. Rodney Little I-270/US 15 Multi-Modal Corridor Study Page Two

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



Mr. J. Rodney Little I-270/US 15 Multi-Modal Corridor Study Page Three

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.

Mr. J. Rodney Little I-270/US 15 Multi-Modal Corridor Study Page Four

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.



Mr. J. Rodney Little I-270/US 15 Multi-Modal Corridor Study Page Five

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 (Varie). 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 Mr. J. Rodney Little I-270/US 15 Multi-Modal Corridor Study Page Six

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

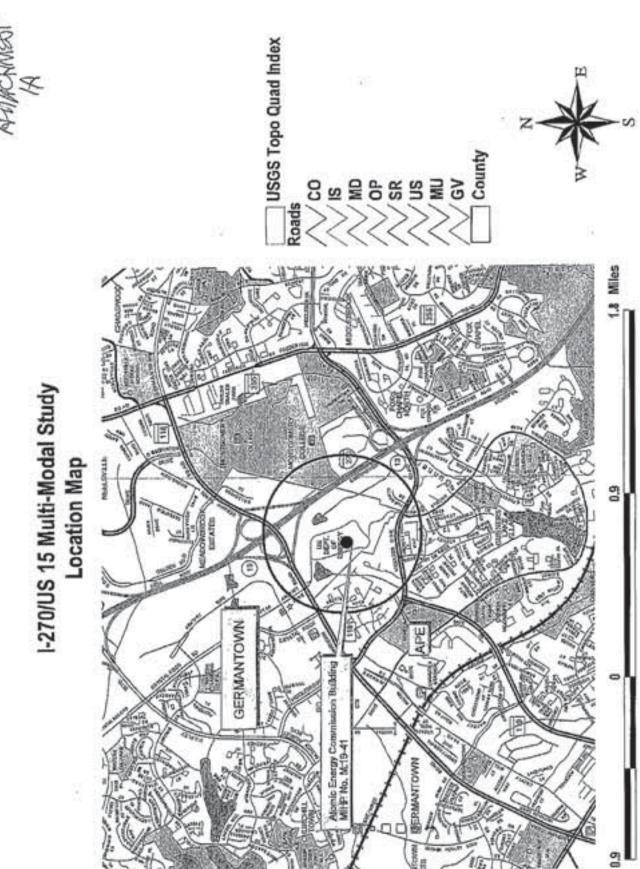


Mr. J. Rodney Little 1-270/US 15 Multi-Modal Corridor Study Page Seven

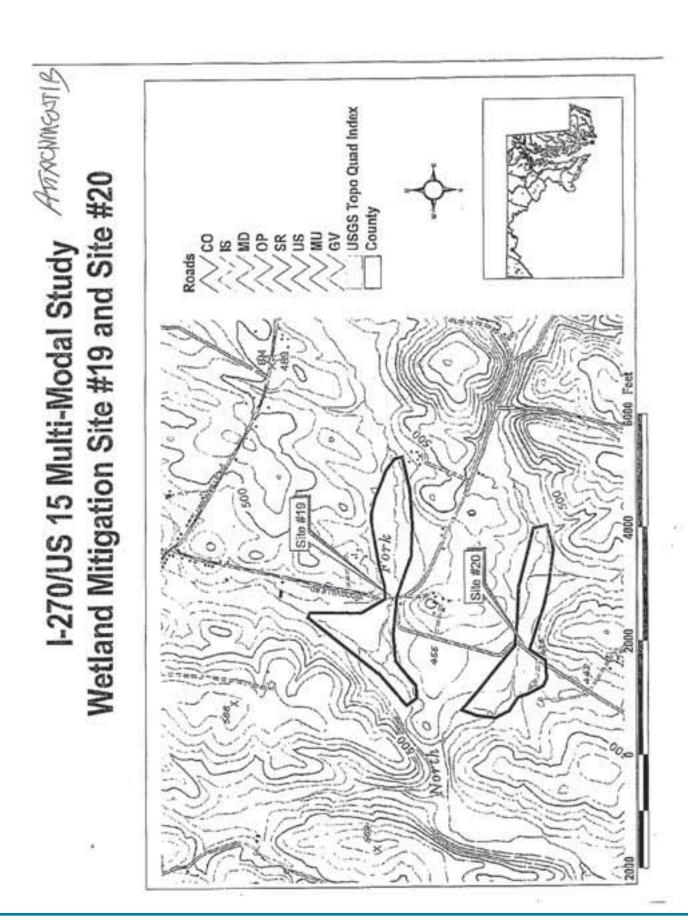
- Attachments: 1) Project Location Maps

 - APE Maps
 MIHP and DOE Forms
 - 4) Eligibility Table
- 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)

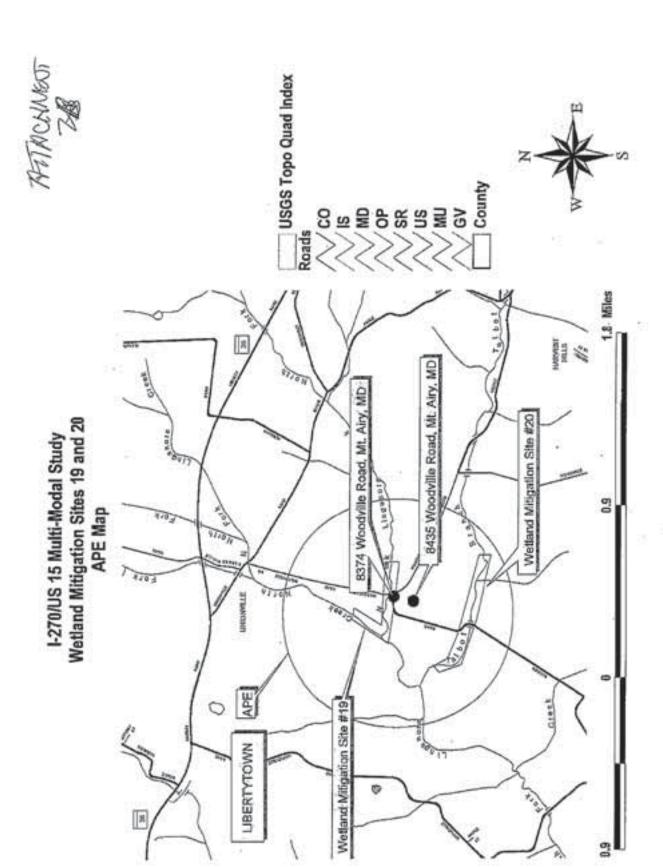






USGS Topo Quad Index I-270/US 15 Multi-Modal Study APE Map





Attachment 5: Eligibility/Status Table

Project Name: 1-270/US 15 Multi-Modal Study

February 5, 2007

Remarks Attachment Wetland Mitigation Site for 1.270 Westland Mitigation Site for 1.270 Alternate CCT and I-270 Mainline SHPO.
Opinion
Requested
2/2007 Requested 2/2007 SHANR Determination NR Type 00 00 MIHP No. M:19-41 8374 Woodville Road, MIHP No. F-8-160 8435 Woodville Road, MIHP No. F-8-161 Atomic Energy Commission Building,

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



1168

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

		aber: FR192B11	MHT Log No.	200700504
		ie: I-270/US 15 Multi-Modal Corr		
		ontgomery and Frederick Countie	S	
Lette	r Date:	February 12, 2007		
The N	Aarylan us with	d Historical Trust has reviewed the the MD State Highway Administrat	documentation attach tion's determinations	ed to the referenced letter an as follows:
Eligi	bility (a	s noted in the Eligibility Table [Atta	nchment 5):	
	11	Concur		
	[X]	Do Not Concur		
Effec	t (as no	ted in the Effects Table [N/A]):		
	11	No Properties Affected		
	1.1	No Adverse Effect		
	11	Conditioned upon the following a	ction(s) (see commen	its below)
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		with FHWA's Section 4(f) criteria licable):	of temporary use (a	s detailed in the referenced
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	ments:	THED CONTINUATION SHEET		
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By:	4	Mosse	4-1:	3-07
1		State Historic Preservation Office/ dand Historical Trust	Date	
		Return by U.S. M	all or Facsimile to:	Wild and
		Dr. Julie Schublitsky, Cultural Resources	1 Dam France, Linbort Linusted	Littlebon,

Or. Julie Schablitsky, Cultural Resources Team Leader, Project Planning Division, 3dD State Highway Administration, P.O. Box 717, Bultimore, MD 21203-0717 Telephone: 410-545-8870 and Facairrile: 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: 1-270/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.



I-270/US 15 MULTI-MODAL CORRIDOR STUDY



HISTORIC PRESERVATION COMMISSION DIVISION OF PLANNING FREDERICK COUNTY, MARYLAND



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

March 12, 2007

Mr. Bruce M. Grey, Deputy Director 9
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 Corridor Study Frederick County portion: Wetland Mitigation Areas 19 and 20

Dear Mr. Grey:

The Frederick County Historic Preservation Commission (HPC) considered the subject request for comments at its regular meeting of March 7, 2007. The Commission voted to concur that no adverse effects would occur to standing historic properties and that a Phase I archeological study should be done in the Area of Potential Effects of Wetland Mitigation Areas 19 and 20. Further, the Commission points out the following corrections:

- Your letter refers to the USGS quadrangle name as "Libertyville". The correct name is "Libertytown", and the Determination of Eligibility (DOE) forms state the name correctly.
- The name of Emerson Burrier Road is consistently misspelled as "Barrier" throughout the DOE form for 8374 Woodville Road.
- 3) The identification of the stone outbuilding associated with 8435 Woodville Road as a "slave quarter" is not confirmed by the research presented and a qualifier term such as "possible" should be inserted before the phrase throughout the DOE form.

The Commission was unable to conclude that the Woodville Road properties are ineligible for the National Register, based on inadequate information and photographs. For future requests for comments involving an evaluation by SHA that properties are ineligible, the HPC recommends that the accompanying photographs and supporting information more clearly address how the properties do not meet the National Register criteria.

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

Very truly yours,

Unet L. Davis

A-D-22

Historic Preservation Planner

Cc: J. Rodney Little, State Historic Preservation Officer

G. Bernard Callan, Jr., Chair, Historic Preservation Commission



John D. Parcari, Secretary Neil J. Pedersen, Administrator

Maryland Department of Transportation

January 10, 2008

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

Martin O'Malley, Governor

Authory G. Brown, Lt. Governor

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).

d Callan, Jr., Charl, Historic Preservation Continuession



Mr. J. Rodney Little Page Two

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.

Mr. J. Rodney Little Page Three

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 rightof-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.



Mr. J. Rodney Little Page Four

ACCORDANGE AND ACCORD

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.

Mr. J. Rodney Little Page Five

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.



Mr. J. Rodney Little Page Six

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 1-270 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.

Mr. J. Rodney Little Page Seven

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

Julie S. Schablitsky

Cultural Resources Team Leader Project Planning Division

april tehn for

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



Mr. J. Rodney Little Page Eight

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)

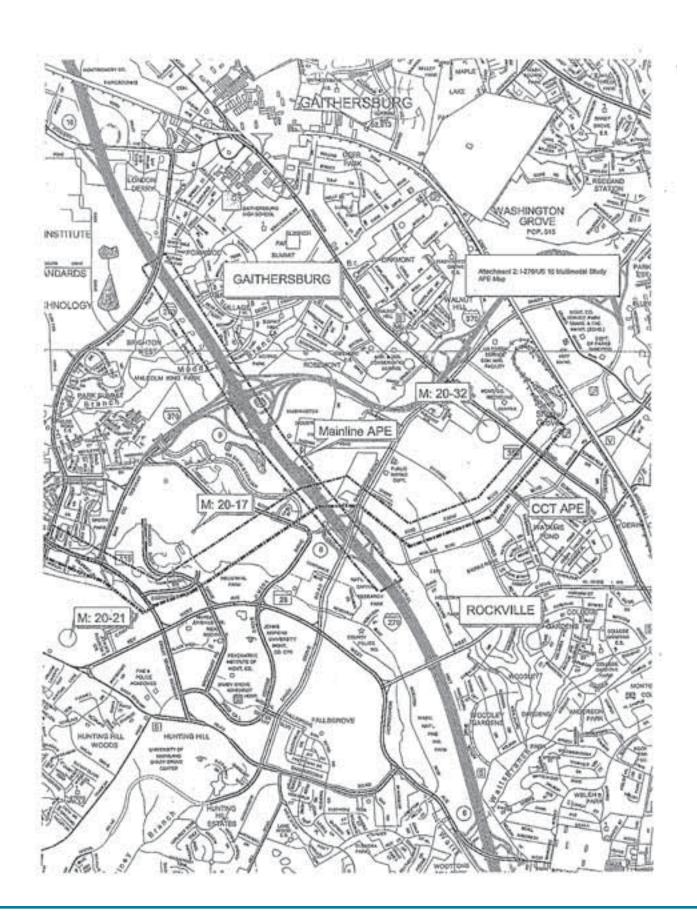
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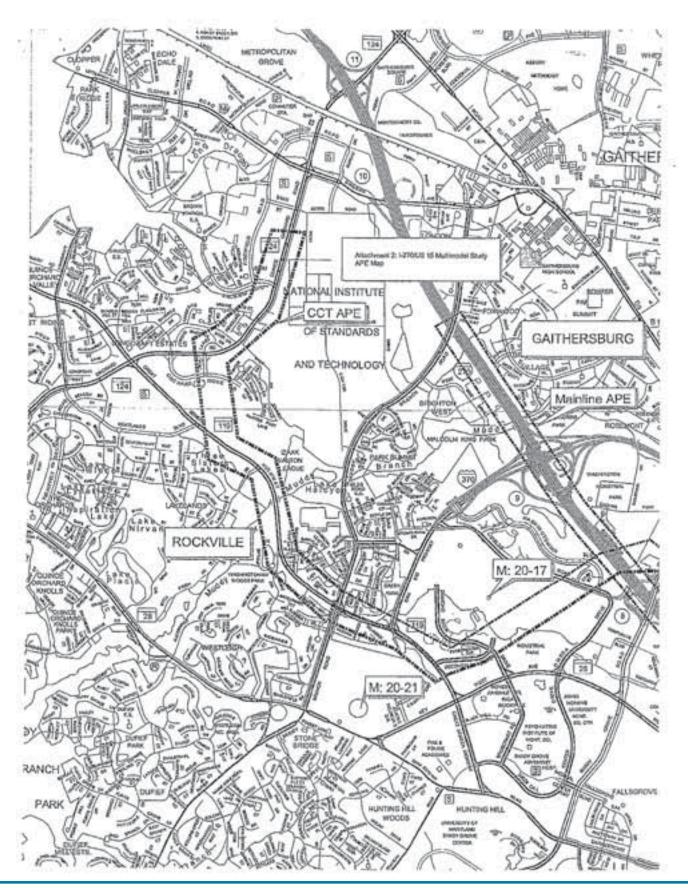
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	as noted in the Eligibility Table	
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1101011	Do Not Concur	
Effect (as no	oted in the Effects Table [Attack	ment 5]):
[]	No Properties Affected	
ii	No Adverse Effect	
11	Conditioned upon the follow	ing action(s) (see comments below)
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Agreement applicable):		pact finding (as detailed in the referenced letter, if
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Return by U.S. Mail or Facsimile to:

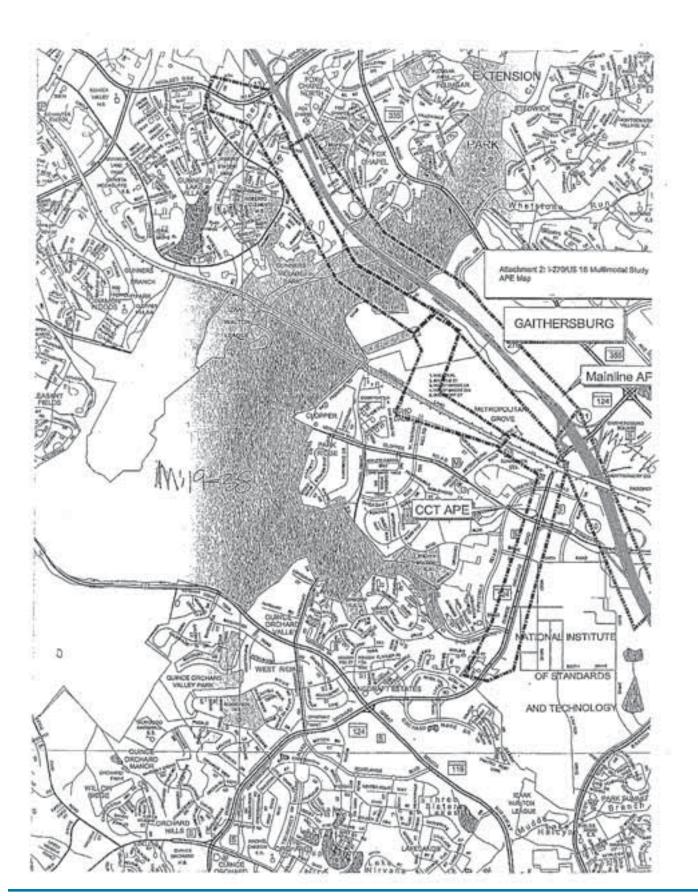
Dr. Julie M. Schublitsky, Cultural Resources Tram Leader, Project Planning Division,
MD State Highway Administration, P.O. Box 717, Baltimore, MD 21203-0717
Telephone: 410-545-8870 and Facsimile: 410-209-5004

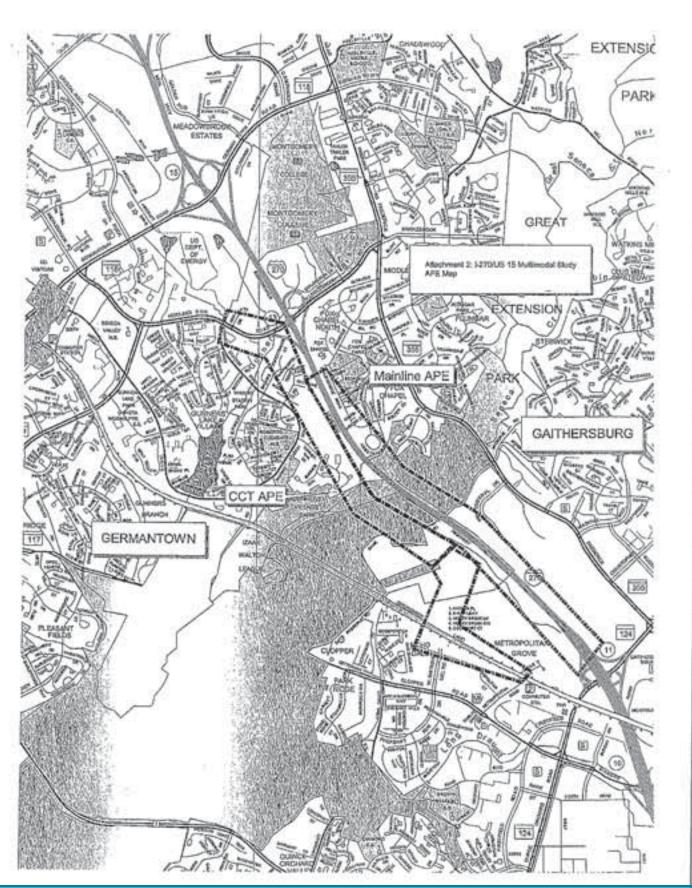




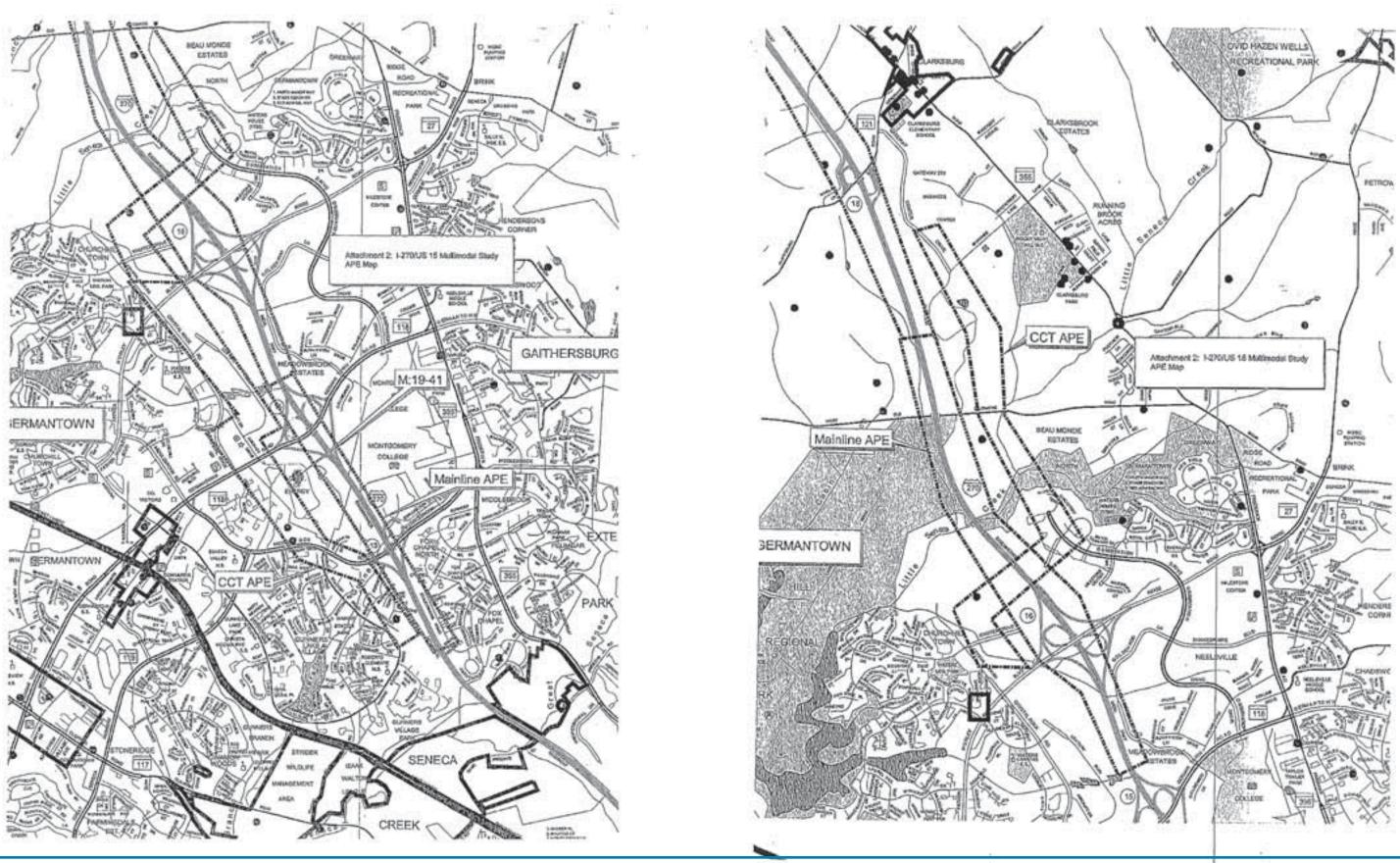
















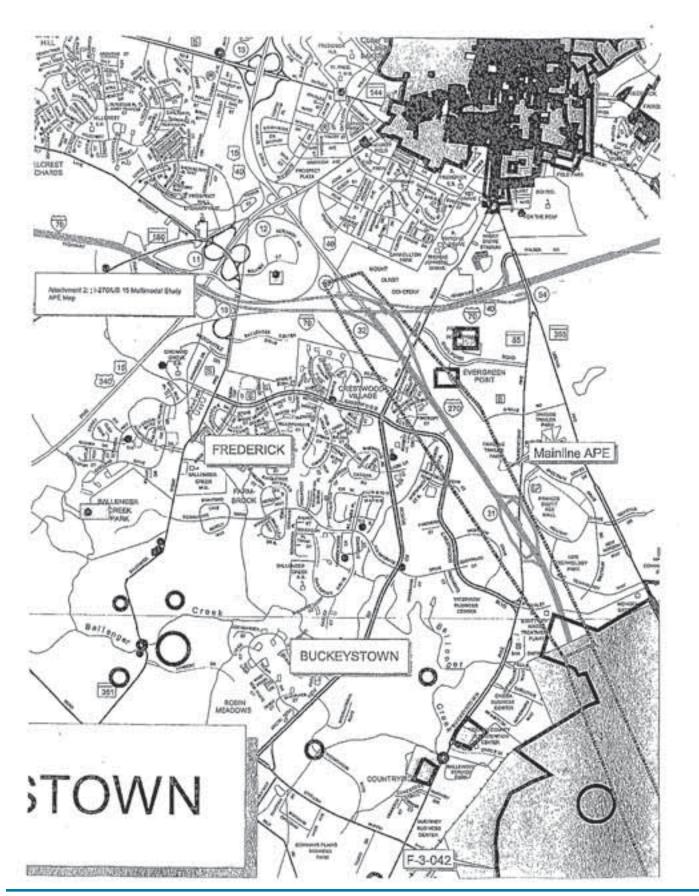


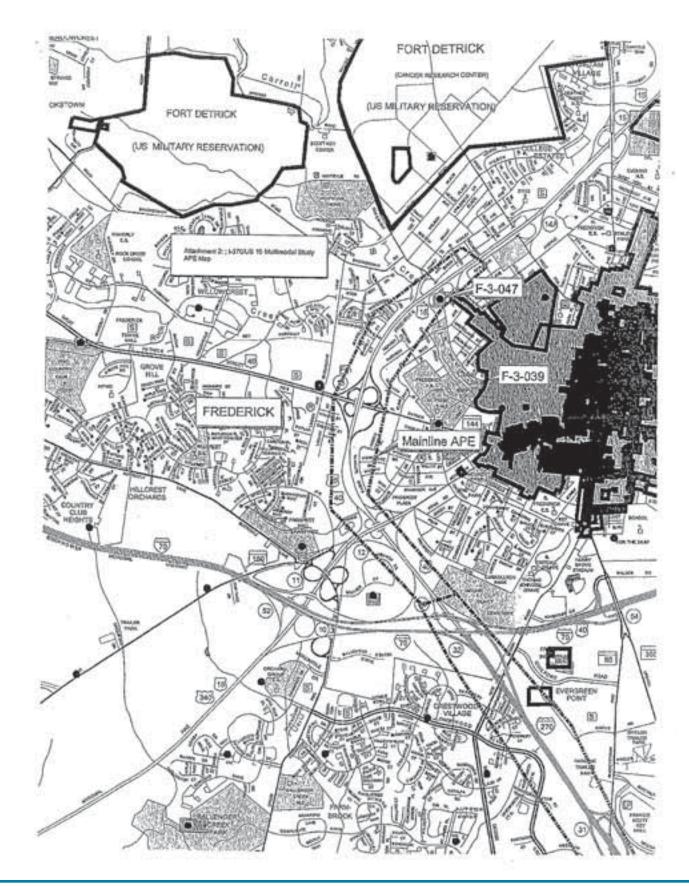


















Attachment 3

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

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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.



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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 atgrade. 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 1-270 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.

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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 deliveréd. Governor Johnson chose Rose Hill as his retirement home during the end of the 18th century. Erected



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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

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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 1-270/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.



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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 1-270/New Cut Rd intersection. This area is near a tributary of Little Senoca 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 pend at Menocacy Boulevard requires testing; other SWM pend 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 Monocscy 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 Comset 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 Profess Name 1,370 (18 Moles Model States

et Namer 1-27th US 15 Multi-Modal Study

			4.0000000	Alterna	Alternate 3A3B	Abern	Abernate 4A/4B	Altera	Alternate SA/SB	Altera	Alternate 6A/6B	Altera	Alternate 7A/7B	The second second	
Resource	150	Type SHA NR Det.	Surpo	Impact	Concur	Impact	SHPO	Empact	SHPO	Impact	SHPO	Impact	SHPO	Attachment	Remarks
Brewningwille Ristoric HD	B	NR	NR	Nene	fag.	None	Requested	None	Requested Nane	None	Requested	None	Requested		Possible impact from wedged
District (M:10-13)					1/2008		1/2008		1/2008		1/2008		1/2008	1	creation. Will be re-coordinated at a later date
Hystotewa Historic District (M:10-59)	AD.	NRE	NRE 11/25/01	Nepe	Requested 1/2008	None	Requested 1/2068	None	Requested 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Eav doc)
Clarksburg Historic District (M:13-10)	QH.	NRC	NR.E 11/26/01	Nesse	Requested? 1/2008	Nane	Requested 1/2088	None	Requested 1/2008	Neae	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Eav dec)
Clarksharg School (M13-52)	ю	NRE	NRE 11/26/01	None	Requested 1/2008	None	Requested 1/2088	Nune	Requested 1/2008	Nane	Requested 1/2008	None	Requested 3/2008		Outside APE* (according to the Eav doc)
Peasant Fields (M:19- 1)	00	NRE	NRE 11/26/01	Nene	Requested)	None	Requested 1/2008	None	Requested 1/2008	Nege	Requested 1/2608	None	Requested 1/2008		Outside APE* (according to the Eav doc)
Atomic Energy Commission Building, U.S. Department of Energy (M:19-41),	90	a a	NR 4/13/07	Афчегъе	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2068	Афети	1/2008		Presumed Adverse for Alberta SA, 4B, 5A, 5B and 5C because of the right-of-way requirements for both telebilishway and the CCT components.
England Crown Farm (M:20-7)	sa.	NRE	NRE 9/24/1996	Adverse	Requested 1/2068	Adverse	Requested 3/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008	Adverse	Requested 1/2008		
Bebeard Farm (Mc20-21)	90	NRE	NRE 9/24/1996	Авчетне	Requested/ 1/2068	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)	M.	NRE	NRE 11/26/01	Nege	Requested 1/2008	None	Requested 1/2008	None	Requested None 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Eav doc)
Sammit Hall (M-21-3)	vo.	NRE	NRE 11/26/91	None	Requested 1/2008	None	Requested 1/2008	None	Requested None 1/2008	None	Requested 1/2008	None	Requested 1/2008		Outside APE* (according to the Env doc)

Outside APE* (according to the Eav doc)	Outside APE* (according to the Env dec)	Outside APE* (according to the Env doc)	Outside APE* (according to the Eav doc)	Outside APE+ (according to the Eav dec)	Outside APE* (according to the Eav dec)	Outside APE* (according to the Eav doc)	Outside APE* (according to the Env dec)	Ounide AFE* (according to the Eav doc)	Previous No Adverse Effect determination changed to Adverse based on Noise Study in the 2002 DEIS which shows adverse noise impacts that were net previously considered.	Outside APE* (according to the Eav doc)	Outside APE* (seconding to the Eav doc)	No transit parties in Frederick County	No Impacts to Archeological Site-NPS concurred (1999 testing found no resources within APE)
Requested 0 1/2068 E	Requested 0	ted	led	Requested 0	per	Requested 0 1/2008 E	Requested 0	Requested 0	par	Requested 0	Requested 0 17008 E	Requested //	1
None Re-	Name Req	None Require	None Reques	None Rec	Neste Res	Nesse Re-	None Red	None Res	Adverse Res	Note Rec	Vone Res	Adverse Res	Nane Res
Requested 2	Requested 7	Requested 1/2008	Requested 5 1/2008	Requested 2	per	Requested 2	Requested 1/2008	Requested 1/2308	Requested //	Requested 7	Requested 7	Requested 1/2008	Requested 7 1/2008
	None	None	Nette	None	-	Nene	None	None		None	None	Adverse	None
Requested None	Requested 1/2068	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested None 3/2008	Requested Nene 1/2008	Requested None 1/2008	Requested None 1/2008	Requested Adverse L'2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	11/5/99
None	Neme	Nene	Neme	None	Nene	Name	None	Name	Adverse	Nane	None	Adverse	None
Requested 1/2008	Requested 1/2008	Requested 1/2008 -	Requested 1/2008	Requested 1/2008	Requested 1/2068	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2908	Requested 1/2008	11,599
None	Kone	None	None	auoxp	None	None	None	None	Adverse	None	dNear	#WATER	Near
Requested N 1/2008	Requested/No 1/2008	Requested N 1/2908	Requested 1/2008	Requested N	Requested No.	Requested N	Requested N	Requested None 1/2008	Requested Adverse	Requested?\	Requested 1/7608	Requested.A	665/11
None	Nene	None	Neme	None	None	None	None	None	Adverse	None	None	Adverse	None
S. S.	NRE 11/2601	NRE 11/26/01	NRE 11/2601	N.	NRE 11/26/01	NRE 11/26/01	NRT	NRE 11/26/01	X X	NR	NRE 11/26/81	NHI.	NIII.
× ×	NRE	NRE	NRE	N.	NRE	NRE	NRT	NRE	×	N.	NRE	NHLNFIL	NRI,
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Washington Grove Historic District (M:21- S)	C. G. Statler House (M:21-7)	Observatory Heights Historic District (M:21- 136)	Brookes, Russell and Walker Historic District (M:21-165)	Thomas Camery (M:21-168)	Chestnut/Meem Bistoric District (M:2): 178)	Casey Barn (M:21-183	Linden Grave (F-1-80) S	Motter-Simmons Farm S (F-2-144)	Spring Bank (F-3-23)	Frederick Historic District (F-3-39)	Gulford (F-3-40)	Menocacy Battlefield NHL (F-3-42)	Monecacy Bartleffeld 18FR30



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 rountil portion in Frederick County	No transit partion in Frederick County	No transit partion in Frederick County	Outside APE* (according to the Env doc)			Outside APE* (according to the Env doc)	Outside APE* (according to the Env &cc)	Outside APE* (according to the Eav 60c)	Outside APE* (according to the Env doc)	Outside APE* (according to the	Possible impact form wedand grazion. Will re-coordinate at a laster date.	Astitipated impacts from Wetland Mit Site 23; If impacted, evaluation would be done as break-out project	Outside APE (1999 testing found no resources extending within APE)
													None
Requested L/1088	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1.2608	Requested 1/2008	Requested 1/2008	Requested 1/2008
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1/2008	Requested 1/2068	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2003	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2065	7	Requested 1/2008	Requested 1/2008
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No impacts anticipated under- maiolise abternatives; SHA wall ensure avoidance through oversight of design plans	Anticipated impacts from Werland Mit Site 23; If impacted, evaluation would be done as break-out project	Anticipated impacts from Wetland Mit Site 28; If impacted, evaluation would be done as break-out project	Anticipated impacts from Wetland Mit Site 28; If impacted, evaluation would be done as betak-out project	Anticipated impacts from Wetland Mit Site 25; If impacted, evaluation world be done as break-not project	
Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008
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Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2008	Requested 1/2608	Requested 1/2008
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Martin O'Mulley, Governor | Anthony Brown, Lt. Governor | State Highway

John D. Potouri, Secretary Designate Nell J. Pedessen, Administrator

Maryland Department of Transportation

April 4, 2008

Re

Project No. FR192B11
I-270/ US 15 Multi-Modal Study
Montgomery and Frederick Counties, Maryland
USGS Rockville, Galthersburg, 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. SHA previously made the determination on January 10, 2008. Since that time we have identified several additional historic standing structures in the Area of Potential Effects (APE) including two bridges, SHA Bridge Nos. 1509600 and 1514800. As explained below, SHA has determined that the bridges are not eligible for inclusion in the National Register of Historic Places (NRHP). The project is unchanged from the previous description included in SHA's January 10 letter, but we have included a project description below and plan sheets for two newly identified consulting parties, Maryland Department of Natural Resources (DNR) and CSX Transportation (CSXT) (Attachment 1). All other Consulting Parties should refer to I-270/US 15 Multi-Modal Study Plan Sheets 2 of 15 and 3 of 15, which show the project impacts to the Baltimore & Ohio Railroad Metropolitan Branch and the Seneca Creek State Park. A location map showing the newly-identified historic standing structures' locations is included as Attachment 2.

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 (GPL), high occupancy vehicle (HOV) lanes, express toll lanes (ETL), auxiliary lanes, and

Mr. J. Rodney Little I-270/US 15 Multi-Modal Study Page Two

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, 2002, SHA coordinated 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. 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, agreeing that the proposed undertaking would have an adverse effect on "numerous historic properties." SHA's most recent letter on January 10, 2008 again found that the I-270/US 15 project would have an adverse effect on historic properties.

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 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.

Funding:

Federal funds are anticipated for this project.

Area of Potential Effects

As noted in SHA's January 10 letter, we 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 to determine the APE for this project. 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, permanent and temporary easements. However, because of the character of the built environment in both Montgomery and Frederick counties, SHA has limited



Mr. J. Rodney Little I-270/US 15 Multi-Modal Study Page Three

the APE to those identified standing historic properties that are within 250 feet of the proposed I270, 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 and the Atomic Energy Commission, U.S. Department of Energy building. The
archeology study 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. Also,
Alternatives 6A/B and 7A/B fall within the same footprint as Alternatives 3A/B, 4A/B and
5A/B/C and the defined APE would also apply to historic properties associated with the earlier
identified alternatives. The APE is indicated on the attached SHA quadrangle map for
Gaithersburg (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 Cultural Resources Database; and attended project meetings. Ms. Bruder made field visits on January 31 and February 22, 2008 to assess the potential for historic standing structures and project impacts. Based on current plans which were provided to MHT on January 10, 2008, SHA and/or MTA will impact two railroad bridges that are part of the Baltimore & Ohio Railroad Metropolitan Branch (MIHP No. M:37-16). The two bridges are SHA Bridge No. 1509600, CSXT over I-270, and Bridge No. 1514800, CSXT over MD 124 in Gaithersburg, Montgomery County. I-270 and the CCT alignment also pass through the Seneca Creek State Park (SCSP) (MIHP No. M:19-38)

The Baltimore & Ohio Metropolitan Branch was constructed after the end of the Civil War, starting in 1866. It extended from Washington, DC to Point of Rocks, Maryland, where it connected to the mainline of the railroad which began in Baltimore. The periods of significance for the Baltimore & Ohio Railroad Metropolitan Branch are 1866 to 1873 and 1901 to 1928. During the earlier period, the Metropolitan Branch was fully constructed, while between 1901 and 1928, the Baltimore & Ohio made capital improvements to its infrastructure, including replacing older bridges with through or deck metal plate girder bridges throughout the system. In 1908 the plate girder bridges became the Baltimore & Ohio Railroad's standard bridge type. This bridge design continued to be the standard type during the late twentieth century. SHA Bridges Nos. 1509600 and 1514800 are examples of through and deck metal-plate girder bridges, respectively. Bridge No. 1514800 dates from 1955 and belongs to the SHA. The

Mr. J. Rodney Little I-270/US 15 Multi-Modal Study Page Four

Maryland State Roads Commission (SRC) designed and constructed the bridge when Brown's Station Road was bypassed and the SRC made MD 124 a state highway. The highway crossed I-270 following its construction in 1955. SHA Bridge No. 15096 was initially constructed in 1955, but was lengthened in 1987 in conjunction with the widening of I-270. Although it retains the through plate girder design of earlier Baltimore & Ohio Railroad bridges, its substructure design has been modified slightly and reflects the SHA design, rather than the Baltimore & Ohio Railroad's standard design.

SHA has determined that SHA Bridge Nos. 1509600 and 1514800 are not eligible for inclusion in the NRHP either individually or as contributing resources to the Metropolitan Branch, Baltimore & Ohio Railroad. Our agencies concurred that the Montgomery County portion of the Metropolitan Branch, Baltimore & Ohio Railroad is eligible for the NRHP in 2000 for its association with the transportation industry, as well as Montgomery County's agricultural and residential development during the late nineteenth and early twentieth centuries. However, SHA Bridge Nos. 1509600 and 1514800 were constructed in 1955 and Bridge No. 1509600 was lengthened in 1987, which is after the Baltimore & Ohio Railroad's period of significance ended so that they do not reflect the importance of the Metropolitan Branch to Montgomery County's residential and agricultural history. As a result, SHA has determined that the bridges are not eligible for inclusion in the NRHP under Criterion A (events). In addition, research did not identify persons of local, state or national significance, and the bridges are not eligible for inclusion in the NRHP under Criterion B. Because the bridges are standard designs that date to the early twentieth century, they are ubiquitous resources and are not eligible for the NRHP under Criterion C (engineering). Criterion D was not included in this study. SHA has provided Determination of Eligibility forms for the two bridges, with photographs and mapping in Attachment 4.

Based on the foregoing discussion, SHA has determined that the I-270/US 15 MultiModal Study improvements will have no impact on SHA Bridge No. 1509600 because we have
determined that the bridge is not eligible. Likewise, because SHA Bridge No. 1514800 is not
eligible for inclusion in the NRHP, the I-270/US 15 Multi-Modal Study improvements, including
construction of the CCT, will have no impact on this bridge. The CCT will parallel the
Baltimore & Ohio Railroad Metropolitan Branch tracks for a short distance north of MD 124,
and MTA plans to construct a station near the MD 124-CXS Transportation intersection.

Despite their close proximity to the historic property, SHA has determined that construction of
these facilities will not alter the significance of, and will have no impact on the Baltimore &
Ohio Railroad Metropolitan Branch. We make this determination because the transit alignment
is a compatible transportation use of the area parallel to the railroad tracks. A copy of the Hybrid
Eligibility and Effects Table is included as Attachment 6 showing SHA's eligibility and effect
determinations.



Mr. J. Rodney Little I-270/US 15 Multi-Modal Study Page Five

The Seneca Creek State Park is a 6,290 acre resource that stretches along the Great Seneca Creek Valley in Montgomery County. The park, which the State created beginning in 1955 on the land surrounding the creek south of Clopper Road (MD 117), shows evidence of the two different land uses during the historical occupation of the county since the eighteenth century. The first uses were agricultural and industrial, best exemplified by the NRHP-listed Seneca Historic District (M:17-63) and the Seneca Stone Quarry (M:17-52). These historic properties are at the southern end of the park, near the Potomac River and well removed from the 1-270 corridor and APE where SHA and MTA plan to make the highway and transit improvements. The second land use began when the Maryland Board of Natural Resources (now the Department of Natural Resources or DNR) acquired 255 acres south of Clopper Road. Since the middle of the twentieth century, DNR has developed the park for conservation and recreation purposes, as well as supporting the historic built environment within the park's boundaries. Improvements to the park include trails, visitor center, shelters, and Clopper Lake, all south of Clopper Road (MD 117). Between 1960 and 1989, DNR increased the park area by acquiring additional lands.

In 1969, DNR purchased Parcel 284 as shown on Montgomery County Tax Map FT123. The parcel consisted of 213 acres on either side of I-270 which DNR planned to use in order to extend the park to the north from Clopper Road. SHA held a right-of-way buffer through the park along I-270 following the highway's construction in 1954 and 1955. The area south of Clopper Road has been developed as a park with trails, structures, visitor amenities and two historic districts, but the park lands in the I-270 and CCT APE north of Clopper Road consist of the creek and second growth forest with a few open areas. There are no buildings, trails or visitor amenities in this part of the park, and no NRHP-listed standing historic properties. Seneca Creek State Park's 6,290 Acre area far exceeds SHA's project right-of-way requirements and 250-foot APE. In consideration of the large size of the park and SHA's comparatively nominal right-of-way requirements, SHA did not complete a Determination of Eligibility form because such a determination is beyond the scope of SHA's project.

Under I-270 Alternatives 3A/B, 4A/B, 5A/B and 5C, SHA and MTA will require 10.47
Acres of right-of-way for the first three alternatives and 8.49 Acres under Alternative 5C from
the SCSP. Under I-270 Alternatives 6A/B and 7A/B, SHA and MTA will require 12.09 Acres
from the SCSP to widen the highway and construct the LRT or BRT options for the CCT. For
all of the I-270/US 15 Multi-Modal Study alternatives, SHA and MTA will require less than
1/100th of an acre from the Park. This area is outside the most significant portion of the Park
because it does not represent either the nineteenth and twentieth century agricultural and
industrial history or the mid-twentieth century recreational and conservation history following
the Park's establishment. The impact will be very minor and will not change the character of the
Park. As a result of the foregoing, SHA has determined that the I-270/US 15 Multi-Modal Study
will have no impact on the Seneca Creek State Park. SHA's impact determination is included in
the Hybrid Eligibility and Effects Table in Attachment 6.

Mr. J. Rodney Little I-270/US 15 Multi-Modal Study Page Six

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 project APB has not changed since our previous correspondence. The investigation by Fiedel and others (2000) 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 is eligible for listing on the NRHP.

No further archeological work is warranted for the project, as scoped, at SHA Bridge Nos. 1509600 and 1514800, based on prior construction disturbance, or at the Seneca Creek State Park. The latter segment of the project was assigned an assessment of no archeological probability by Fiedel and others, based on prior negative survey and construction disturbance.

No archeological investigations are recommended for the project at this time. Additional archeological work will be required in the future as the project design is more fully developed. Current plans still lack many specific design details, and identification of project elements such as stormwater pond locations has not yet been completed. SHA foresees the need for additional work at several locations that would be impacted by project design changes made subsequent to Fiedel and others (2000) study, including individual breakout projects at interchanges; wetland mitigation or stormwater work; and the specific project elements on both the I-270/US 15 roadway and the CCT alignment indicated on Attachment 5. SHA recommends that this additional Phase I archeology be conducted after design changes are resolved and the number of alternatives is reduced.

Review Request

Please examine the attached maps, plans, and Effects Table. We request your concurrence by May 7, 2008 that SHA Bridge Nos. 1509600 and 1514800 are not eligible for inclusion in the NRHP, and that there would be adverse effects on historic properties by FR192B11, the I-270/ US 15 Multi-Modal Study. By carbon copy, we invite the Montgomery Preservation, Inc., the Montgomery County Historic Preservation Commission, the Maryland Department of Natural Resources and the CSX Transportation 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 May 7, 2008, we will assume that these offices decline to participate. Please call Ms. Anne E. Bruder at



Mr. J. Rodney Little I-270/US 15 Multi-Modal Study Page Seven

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

Julie S. Schablitsky

Cultural Resources Team Leader Project Planning Division

Attachments: 1) Project Plans

2) Location Map

3) Area of Potential Effects Map

4) Determination of Eligibility Forms, Photographs and Mapping

Areas Requiring Supplemental Archeological Survey
 Hybrid Eligibility and Effects Table

Ms. Anne E. Bruder, SHA-PPD (w/Attachments 1-5)

Ms. Anne Elrays, SHA-PPD (w/Attachments)

Mr. Richard Ervin, SHA-PPD

Mr. Wayne Goldstein, Montgomery Preservation, Inc. (w/Attachments)

Mr. Brian Horn, SHA-PPD (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. Joseph Kresslein, SHA-OPPE

Mr. Carl Roe, CSX Transportation

Dr. Julie Schablitsky, SHA-PPD

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. 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) 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

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

Ma State Historic Preservation Office/

Maryland Historical Trust

6-26-08



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: 1-270 / 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.
- SIIA 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

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

CONTINUATION SHEET #2 Maryland Historical Trust Comments

Project Number: FR193B11 MHT Log No. 200800113 & 200801047

Project Name: 1-270 / US 15 Multi-Modal Study

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



State Highway

Martin O'Malley, Governor Anthony G. Beown, Lt. Governor John D. Poccari, Secretary Neil J. Pedersea, Administrator

Maryland Department of Transportation

June 2, 2008

RE.

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

Mr. Nelson J. Castellanos Division Administrator Federal Highway Administration City Crescent Building – Suite 2450 10 South Howard Street Baltimore MD 21211

Attn.: Mr. Dan Johnson

Dear Mr. Castellanos:

Please notify the Advisory Council on Historic Preservation (ACHP) of the determination that the proposed State Highway Administration (SHA) and Maryland Transit Administration (MTA) highway and transit improvements on I-270, US 15 and the Corridor Cities Transit corridor will have an adverse effect on historic properties. The Maryland State Historic Preservation Officer (MD SHPO) was notified concerning the effects of this project on January 10, 2008 and April 4, 2008, but has not replied to our letter. We are providing you with a draft letter conforming to the documentation requirements cited at 36 CFR 800.11(e) for your use in notifying the ACHP (Attachment 1). SHA previously transmitted documentation to your office regarding the project for the ACHP on April 1, 2002. The new alternatives developed since 2002 require SHA to provide information about these and the potential impacts to all the historic properties within the project's Area of Potential Effects (APE).

In addition to consulting with the MD SHPO, SHA also invited the National Park Service (NPS) and the National Historic Landmark (NHL) Office, Philadelphia Region, to consult with us regarding impacts to the Monocacy National Battlefield, which is a National Historic Landmark. Copies of these letters, as well as other consulting party letters are included in the ACHP package in Attachment 2. SHA has not received a response from the NHL Office. We request that PHWA resend the notification letter to that agency to invite their participation. A draft copy is included as Attachment 3.

Mr. Nelson Castellanos I-270/US 15 Multi-Modal Study Page Two

There are seven affected historic properties in addition to the Monocacy National Battlefield. SHA invited property owners to be consulting parties and received responses from the following:

Historic Property	MIHP Number	Property Owner or Consulting Party	Responses Received from Consulting Party
Atomic Energy Commission Building ,U.S. Department of Energy	M:19-41	General Services Administration	According to SHA- GSA discussions, GSA responded, but response not received by SHA
England/Crown Farm	M:20-7	Crown Village, LLC	No response received as of 5/28/2008.
Belward Farm	M:20-21	Johns Hopkins Real Estate	No response received as of 5/28/2008,
Spring Bank	F-3-22	Spring Bank, LLC	No response received as of 5/28/2008.
Monocacy National Battlefield NHL	F-3-42	National Park Service	NPS responded 4/18/2008
Schifferstadt	F-3-47	Frederick County Landmarks Foundation	FCLF responded 2/1/2008
Rose Hill	F-3-126,	Frederick County Parks and Recreation Department	Frederick County Parks and Recreation Department responded 2/19/2008
Birely-Roelkey Farm	F-3-134	Mr. and Mrs. Gary J. Thatcher	No response received as of 5/28/2008.

SHA has also received concurrence from the Frederick County Division of Planning, Historic Preservation Commission and the City of Frederick [MD] Historic Preservation Commission on the adverse impacts to resources in the County and the City. SHA has not received comments from the Montgomery County Historic Preservation Commission or Montgomery Preservation, Inc. Furthermore, we have not received comments from the abovelisted property owners as noted in the table.

SHA has held preliminary meetings to discuss project impacts and possible mitigation with the National Park Service regarding Monocacy Battlefield, and with the Frederick County Landmerks Foundation regarding Schifferstadt on November 8, 2007 and February 15, 2008.



Martin O'Malley, Governor Anthony Brown, Lt. Governor State Highway
Administration

John D. Poetati, Secretary Designate Neil J. Pedersen, Administrator

Maryland Department of Transportation

January 17, 2008

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

Mr. Nelson Castellanos I-270/US 15 Multi-Modal Study Page Three

We also met with the Frederick County Landmarks Foundation on April 11, 2008. We anticipate conducting additional meetings to complete our studies. The MD SHPO has requested a tour of the impacted historic properties and SHA will schedule it in the near future. Once we receive the MD SHPO's concurrence with the project's adverse effect determination, we will draft the Memorandum of Agreement.

Thank you for your assistance with the I-270/US 15 Multi-Modal Study. Please contact Ms. Anne Bruder at 410-545-8559 or abruder@sha.state.md.us with questions regarding historic standing structures for this project. Mr. Richard Ervin may be reached at 410-545-2878 or rervin@sha.state.md.us.

Sincerely,

Raja Veeramachaneni Director

by

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

410-545-0412

Attachments (3)

Ms. Anne E. Bruder, Architectural Historian, Project Planning Division, SHA (w/Attachments)

Ms. Anne Elrays, Environmental Manager, Project Planning Division, SHA (w/Attachments)

Mr. Richard Ervin, Archeologist, Project Planning Division, SHA (w/Attachments)

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

Mr. Brian Horn, Project Manager, Project Planning Division, SHA (w/Attachments)

Mr. Rick Kiegel, Project Manager, MTA (w/Attachment)

Mr. J. Rodney Little, MD State Historic Preservation Officer, MHT (w/Attachments)

Dr. Julie Schablitsky, Assistant Division Chief, Project Planning Division, SHA

Mr. Donald Sparklin, Division Chief, Project Planning Division, SHA



Ms. Marie Rust I-270/US 15 Multi-Modal Study Page 2

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

The state of the s

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 1-270. 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

Ms. Maric Rust I-270/US 15 Multi-Modal Study Page 4

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 1-270 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.

270 15 Multi-Modal Corridor Study

Ms. Marie Rust I-270/US 15 Multi-Modal Study Page 3

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

Ms. Marie Rust I-270/US 15 Multi-Modal Study Page 5

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 Preuminary Engineering

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

e: 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 Logard, ACHP (w/Attachments)

Mr. Joseph Kresslein, SHA-OPPE

Dr. Julie Schablitsky, SHA-PPD

Ms. Susan Trail. Superintendent. Monocacy National Battlefield

I-270/US 15 MULTI-MODAL CORRIDOR STUDY



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

Ms. Marie Rust I-270/US 15 Multi-Modal Study Page 6

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 pend at Monocacy Boulevard requires testing; other SWM pend 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



John D. Psecari, Secretary Designate Neil J. Pedersen, Administrator

Maryland Department of Transportation

January 17, 2008

Ret

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).

Ms. Susan Trail I-270/US 15 Multi-Modal Study Page Two

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



Ms. Susan Trail I-270/US 15 Multi-Modal Study Page Three

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 1-270 within the NHL. The I-270/US 15 Multi-Modal Study Alternatives 3, 4, 5, 6 and 7

Ms. Susan Trail I-270/US 15 Multi-Modal Study Page Four

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 reassessment 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



Ms. Susan Trail I-270/US 15 Multi-Modal Study Page Five

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

Ms. Susan Trail I-270/US 15 Multi-Modal Study Page Six

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

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)

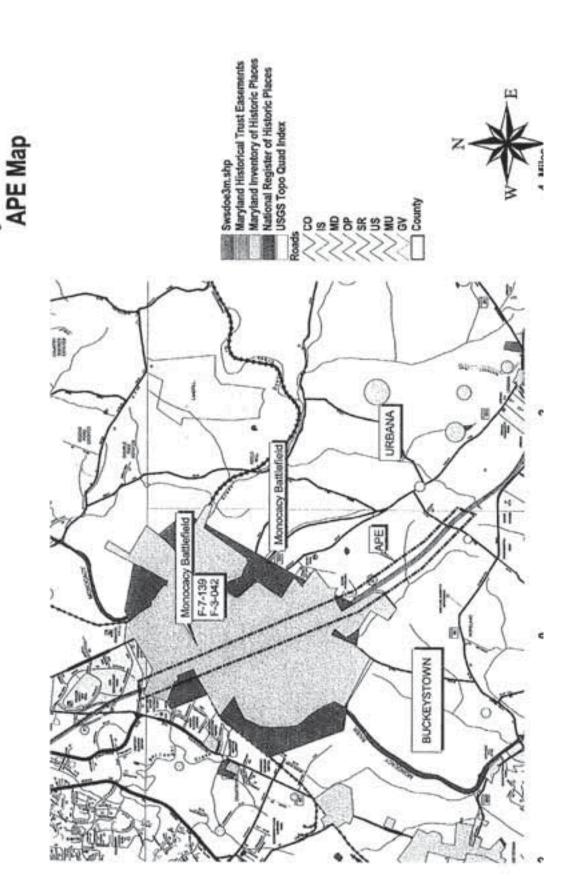
Dr. Julie Schablitsky, SHA-PPD

Mr. Russell Walto, SHA-PPD (w/Attachments)

I-270/US 15 MULTI-MODAL CORRIDOR STUDY



1-270/US 15 Multi-Modal Study SHA Project No. FR192B11





Martin O'Malley, Governor | Anthony Brown, Lt. Governor eHenvay John D. Poccari, Secretary Derignate
Neil J. Pedersen, Administrator

Maryland Department of Transportation

March 18, 2008

Re: Project No. FR192B11

I-270/US 15 Multi-Modal Study

Frederick and Montgomery Counties,

CERTIFIED-RETURN RECEIPT REQUESTED

Maryland

USGS Rockville, Gaithersburg,

Germantown, Urbana and Frederick 7.5'

Quadrangle

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.



Mr. Joe Lawler 1-270/US 15 Multi-Modal Study Page Two

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

Julie M. Schablitsky

Cultural Resources Team Leader Project Planning Division

Attachments: 1) SHA January 10, 2008 Letter to MD SHPO

- SHA January 17, 2008 Letter to MNB
- SHA January 17, 2008 Letter to NHL Philadelphia Office
- Area of Potential Effects Map
- 5) Project Plans

Mr. Joe Lawler 1-270/US 15 Multi-Modal Study Page Two

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





IN REPLY REFER TO

L1417 (NCR-LRP)

United States Department of the Interior

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

APR 1 8 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 Bautefield of the Maryland State Highway Administration's finding that the proposed I-270/US 5 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. \$5 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. \$5 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:

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.

 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.
- 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.
- 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 festures degraded by modern intrusions such as I-270, including removing the borrow pit on the Worthington Ferm 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 Freservation 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

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04/18/08 13:09 FAX 2024010017

LANDS RESOURCES PLAN

 Paul Hawke, Chief, American Battlefield Protection Program, 1201 Eye Street, N.W., (225) Washington, D.C. 20005, (202) 354-2023

Given Monocacy National Battlefield's status as a National Historic Landmark, we also want to ensu that the National Historic Landmark program and the Advisory Council on Historic Preservation bec 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, Monoccoy National Battle at (301) 694-3147.

Sincerely,

Regional Director, National Capital Region

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, Rummal, 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. Grev 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 abovelisted 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

Joanne Ivancic

Executive Director

Panne

The Frederick County Landmarks Foundation



John D. Porcori, Secretary Neil J. Pedessen, Administrator

Maryland Department of Transportation

February 25, 2008

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

Martin O'Melley, Governor

Anthony G. Brown, Lt. Governor

Dear Ms. Ivancie:

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.



Ms. Joanne Ivancie I-270/US 15 Multi-Modal Study Page Two

Thank you, again, for your correspondence. If you have any further questions or concern regarding the I-270/US 15 Multi-Modal Corridor Study, please do not hesitate to contact 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

Environmental Manager Project Planning Division

anne Eleage

cc: Mr. J. Rodney Little, Maryland State Historic Preservation Officer Ms. Emily Paulus, Historic Preservation Planner, Frederick City Historic District Commission Ms. Joanne Ivancic I-270/US 15 Multi-Modal Study Page Three

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



1.6

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: 1-270/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,

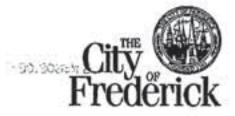
Janet L. Davis

Historic Preservation Planner

Cc: J. Rodney Little, State Historic Preservation Officer

G. Bernard Callan, Jr., Chair, Historic Preservation Commission

William J. Holtringer Mayor



Aldermen
Marcia A. Hell
President Pro Tem
David "Kip" Koonta
Alan E. Imhoff
C. Paul Smith
Donna Kuzemchak Ramaburg

I-270/US 15 MULTI-MODAL CORRIDOR STUDY

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

torize a trace and a second

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

PLANNING DEPARTMENT

Municipal Office Annex * 140 W. Patrick St. * Frederick, MD * 21701-5415 * 301-600-1499 * Fax: 301-600-1837 www.ciryoffrederick.com





COMMISSIONERS

Jan H. Gudner President

David P. Gray Vice President

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DIVISION DIRECTOR

Paul Dist

CHARACTER COUNTS!

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

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.

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



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

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





Martin O'Malloy, Governor Anthony G. Brown, Lt. Governor John D. Puresri, Secretary Neil J. Pederson, 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.

Mr. Greg May 1-270/US 15 Multi-Modal Study Page Two

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



Mr. Greg May I-270/US 15 Multi-Modal Study Page Three

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 B. 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

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

Mr. Greg May I-270/US 15 Multi-Modal Study Page Four

o: 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



John D. Porcuri, Secretory Neil I. Pedersen, Administrator

Maryland Department of Transportation

June 20, 2008

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



Mr. and Mrs. Gary J. Thatcher I-270/US 15 Multi-Modal Study Page Two

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

Mr. and Mrs. Gary J. Thatcher I-270/US 15 Multi-Modal Study Page Three

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 B. 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

Julie M. Schablitsky
Assistant Division Chief
Project Planning Division

Attachments: 1) MIHP Form

- 2) January 10, 2008 Adverse Effect Letter
- ACHP Brochure
 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 Hom/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)

De Julia M Cakabiteler CHA DDD





John D. Poresri, Secretary Neil J. Pederson, Administrator

Maryland Department of Transportation

June 20, 2008

Re

Project No. FR192B11 1-270/ 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

Mr. David M. McDonough I-270/US 15 Multi-Modal Study Page Two

determination can be found in Attachment 1. On January 10, 2008, SHA wrote to Mi 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 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 desig of the project. Through the consultation, you will assist SHA, MTA, FHWA and MH7 seeking ways to avoid or reduce the project's adverse impact to the Belward Farm. Fo 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 Marylan 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 act agricultural production. It is located northwest of Rockville and was built about 1891 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 includin 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 propert 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. Proj plans are included as Attachment 4.



Mr. David M. McDonough 1-270/US 15 Multi-Modal Study Page Three

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

ACHP Brochure
 Project Plans

Mr. David M. McDonough I-270/US 15 Multi-Modal Study Page Four

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 John D. Potessi, Secretary Neil J. Pedersen, Administrator

Maryland Department of Transportation

June 20, 2008

Re: P

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,

Spring Bank LLC I-270/US 15 Multi-Modal Study Page Two

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 CPR §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



Spring Bank LLC I-270/US 15 Multi-Modal Study Page Three

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 Brvin 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



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.

Sinceraly

Maher Kilajian

Managing Partner, Spring Bank, LLC





Martin O'Mallay, Governor
Anthony G. Brown, Lt. Governor

John D. Porcati, Socretary
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

Mr. Dean Fitzgerald I-270/US 15 Multi-Modal Study Page Two

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



Mr. Dean Fitzgerald I-270/US 15 Multi-Modal Study Page Three

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

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 245 Baltimore, Maryland 2120

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



270 15
Multi-Modal Corridor Study

2

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 Iane 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.

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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

I-270/US 15 MULTI-MODAL CORRIDOR STUDY
A-D-73

3



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 poncs 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

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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,

Nelson J. Castellanos Division Administrator

Diniel W. Johnson

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

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

A-D-74 I-270/US 15 MULTI-MODAL CORRIDOR STUDY



U.S. Department of Transportation Federal Highway

DELMAR Division - Maryland

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

July 11, 2008

In Reply Refer To: HDA-MD

Mr. Donald L. Klima
Director, Office of Federal Agency Reviews
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW, Suite 809
Old Post Office Building
Washington, DC 20004
Phone: (202) 606-8503

Attention: Ms. Carol Legard

Dear Mr. Klima:

In accordance with 36 CFR §800.6, the Federal Highway Administration (FHWA) wishes to notify you that the I-270/US 15 Multi-Modal Corridor Study in Montgomery and Frederick Counties, Maryland will have adverse effects on historic properties. FHWA will assist the Maryland State Highway Administration (SHA) with improvements to I-270 and US 15 in Montgomery and Frederick Counties, Maryland, while the Federal Transit Administration (FTA) will assist the Maryland Transit Administration (MTA) to construct the Corridor Cities Transit in Montgomery County. The ACHP previously participated in the project's consultation from 2002 to 2004 by attending meetings sponsored by SHA, FHWA and the National Park Service at the Monocacy National Battlefield National Historic Landmark (NHL). FHWA again requests that the ACHP participate in the consultation with the MD SHPO and the NPS to resolve the adverse impact on the Monocacy National Battlefield NHL.

The following historic properties will be adversely affected by the proposed project under the I270/US 15 Alternatives 6A, 6B, 7A, and 7B: 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 NHL (F-3-42) [Monocacy Battlefield NHL or Historic
Landmark], Spring Bank (F-3-22), Schifferstadt (F-3-47), Rose Hill Manor (F-3-126), and
Bireley-Roelkey Farm (F-3-134). The project will require new right of way and/or have adverse
noise impacts that meet or exceed 67 decibels (dBA) on the eight historic properties. Under
FHWA regulation, noise impacts which meet or exceed 67 dBA warrant abatement
consideration. The Harmony Grove Union Church (F-3-197) and the Worman House (F-3-198)
would incur no adverse impacts from Alternative 6 and Alternative 7. Neither alternative
requires right-of-way or permanent and temporary easements from the Harmony Grove Union
Church or the Worman House, nor will the noise levels meet or exceed 67 dBA. There is no
transit option planned in the Frederick County portion of the I-270/US 15 Multi-Modal project.



The project plans and a copy of SHA's January 10, 2008 and April 4, 2008 adverse effect letters to the Maryland State Historic Preservation Officer (MD SHPO) are included as Attachment 1 and Attachment 2. The letters and attachments contain a description of the undertaking, steps taking to identify historic properties, a description of the affected properties, a description of the undertaking's effects, and an explanation of why the adverse effect criteria apply.

In addition to consulting with the MD SHPO, SHA also invited the National Park Service (NPS) and the National Historic Landmark (NHL) Office, Philadelphia Region, to consult with us regarding impacts to the Monocacy Battlefield NHL. Copies of these letters, as well as other consulting party letters are included in Attachment 3. SHA invited historic property owners and federal, county and local governments and historic preservation groups to be consulting parties and received responses from the following:

- The U.S. General Services Administration for the U.S. Department of Energy (Atomic Energy Commission Building, Germantown, MD)
- The City of Frederick [MD] Historic Preservation Commission for Schifferstadt, Rose Hill and Spring Bank (these properties are within the Frederick city limits, but are not owned or controlled by the City);
- Frederick County Parks and Recreation Department for Rose Hill (it is a Frederick County park, but within the Frederick city limits);
- The Frederick County Landmarks Foundation for Schifferstadt; and
- The Frederick County Division of Planning, Historic Preservation Commission.

Correspondence between SHA and the consulting parties is also included in Attachment 3.

SHA also invited Mr. and Mrs. Gary J. Thatcher (owners of Birely-Roelkey Farm), Spring Bank,

LLC (owners of Spring Bank), Montgomery Preservation, Inc., Johns Hopkins University and

Johns Hopkins Real Estate, Crown Village, LLC, and the Montgomery County Historic

Preservation Commission to participate in the consultation, but to date has not received a

response from these parties. Once the MD SHPO's concurrence is received, we will continue

discussions regarding mitigation with the consulting parties and drafting the Memorandum of

Agreement.

I-270/US 15 MULTI-MODAL CORRIDOR STUDY



Thank you for your assistance in this matter. Please contact Mr. Dan Johnson of my staff at 410-779-7154 or danw.johnson@dot.gov, with any questions regarding this submission.

Sincerely yours,

Nelson J. Castelianos Division Administrator

Daniel W. Tohnson

Enclosures: 1) Project Plans

2) SHA Adverse Effect Letters

3) Consulting Parties Correspondence

Ms. Gail McFadden-Roberts, Federal Transit Administration

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

Cc: Don Sparklin, MD SHA Julie Schablitsky, MD SHA Rodney Little, MHT

John L. Nau, III Chairman

Susan S. Barnes Vice Chairman

John M. Fowler Executive Director



Preserving America's Heritage

July 29, 2008

Honorable James D. Ray Acting Administrator Federal Highway Administration 1200 New Jersey Avenue, SE., Room E87-314 Washington, DC 20590

Ref: 1-270 and US 15 Highway Improvements

Montgomery and Frederick Counties, Maryland

Dear Mr. Ray:

In response to a notification by the DELMAR Division-Maryland, Federal Highway Administration (FHWA), the Advisory Council on Historic Preservation (ACHP) will participate in the consultation to develop a memorandum of agreement to resolve the adverse effects to historic properties resulting from the proposed improvements to I-270 and US 15 in Montgomery and Frederick Counties, Maryland, Our decision to participate in this consultation is based on the Criteria for Council Involvement in Reviewing Individual Section 106 Cases, contained within our regulations, "Protection of Historic Properties" (36 CFR Part 800), implementing Section 106 of the National Historic Preservation Act. The criteria are met for this proposed undertaking because of the complexity of the project, as a multi-modal corridor study, and its potential to have substantial impacts on important historic properties, including the Monacacy Battlefield National Historic Landmark.

Section 800.6(a)(1)(iii) of our regulations requires that we notify you, as the head of the agency, of our decision to participate in consultation. By copy of this letter, we are also notifying Nelson J. Castellanos, DELMAR Division Administrator, of this decision.

Our participation in this consultation will be handled by Carol Legard, FHWA liaison at the ACHP. She can be reached at 202-606-8522 or clegard@achp.gov. We look forward to working with the FHWA and other consulting parties to consider alternatives to this undertaking that could avoid, minimize, or mitigate the adverse effects to historic properties and to reach a memorandum of agreement.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvanie Avenue NW, Suito 803 • Washington, DC 20004 Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

A-D-76 I-270/US 15 MULTI-MODAL CORRIDOR STUDY



CIVIL WAR PRESERVATION TRUST

Saving America's Hallowed Ground

Theodore Sedgwick Clarinum 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

4 20000 024 114 205 1 1000

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 1-270, 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.

WASHINGTON OFFICE

1331 H Street NW • Suite 1001 • Washington, DC 20005 Phone: (202) 367-1861 or (800) 298-7878 • Fax: (202) 367-1865 HAGERSTOWN OFFICE 11 Public Square * Seite 200 * Hagerstown, MD 21740 Phone: (201) 665-1400 or (888) 606-1400 * Fax: (201) 665-1416 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, Presiden

I-270/US 15 MULTI-MODAL CORRIDOR STUDY





2. Community Coordination

I-270/US 15 MULTI-MODAL CORRIDOR STUDY



I-270/US 15 MULTI-MODAL CORRIDOR STUDY

B. Community Coordination

Community Coordination

DATE	FROM	то	SUBJECT	PAGE
12/13/06	SHA	Public	Requesting assistance in identifying outreach efforts to low-income and minority populations	47
12/13/06	SHA	Public	Requesting assistance is disseminating information about the project and informing your community	48



Robert L. Flatagan, Secretary Neil J. Potersen, Administrator

Administration O

Maryland Department of Transportation

December 13, 2006

RE: Project No. FR192B11

I-270/US 15 Multi-Modal Corridor Study Shady Grove Metro Station to Biggs Ford Road Frederick and Montgomery Counties, Maryland

Dear Sir/Madam:

The Maryland Department of Transportation (MDOT), through the State Highway Administration (SHA) and the Mass Transit Administration (MTA), is currently evaluating several transportation improvement strategies for the I-270/US 15 corridor. The study area extends from the Shady Grove Metro Station along I-270 in Montgomery County, north to Biggs Ford Road on US 15 in Frederick County. A Public Workshop for this project is currently anticipated during 2007.

The purpose of this letter is to request your assistance in our outreach efforts to involve minority and low-income populations in planning activities within the I-270/US 15 corridor. Please post the attached project informational sheet and map on your community bulletin board, or other readily accessible location. Additional project information may also be obtained by reviewing the SHA website located at http://www.marylandroads.com/WebProjectLifeCycle/ProjectHome.asp.

Thank you for you time and consideration. If you have any questions or concerns please contact the SHA Project Manager, Mr. Russell Walto, at 410-545-8547, or the Environmental Manager, Ms. Anne Elrays, at 410-545-8562. Both the Project Manager and Environmental Manager may be reached toll-free at 1-800-548-5026.

Very truly yours,

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

Joseph R. Kresslein

Assistant Division Chief Project Planning Division

Enclosure

Street Address: 707 North Calvert Street 1 Baltimore, Maryland 21202 2 Phone: 410.545.0000 1 www.marylandroads.com



Robert L. Ehrlich, Jr., Governor Michael S. Steele, Lt. Governor



Robert L. Flamagan, Secretary Neil I. Pederson, Administrator

Maryland Department of Transportation

December 13, 2006

Re:

Project No. FR192B11 I-270/US 15 Multi-Modal Corridor Study Shady Grove Metro Station to BiggsFord Road Frederick and Montgomery County

Dear Sin Madam:

The Maryland State Highway Administration (SHA) and Mass Transit Administration are currently conducting Project Planning Studies to improve the I-270/US 15 Corridor. The study area extends from the Shady Grove Metro Station along I-270 in Montgomery County, north to Biggs Ford Road on US 15 in Frederick County (see attached map and project information sheet).

We would appreciate your assistance in informing your community about the project and potential impacts. The SHA would like to offer the opportunity for a meeting with you and other representatives of your organization to address any questions and concerns they may have regarding the project. Additional project information can be found by going to: http://www.marylandroads.com/WebProjectLifeCycle/ProjectHome.asp. A Public Workshop for this project is anticipated during 2007.

Thank you for your time and consideration. If you wish to schedule a meeting with SHA representatives, or simply be placed on our mailing list, please contact the SHA Project Manager, Mr. Russell Walto, at 410-545-8547, or the Environmental Manager, Ms. Anne Elrays, at 410-545-8562 or toll-free at 1-800-548-5026.

Very truly yours,

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

hv:

Joseph R. Kresslein Assistant Division Chief

Project Planning Division

Enclosures

-63

Street Address: 707 North Calvert Street + Baitimore, Maryland 21202 - Phone: 410:545.0306 + www.marylandreads.com

DISCOVERY. SERING GARDEN CLOVER. Carroll County Howard County Frederick County Montgomery County Loudon 1-270 / US 15 MULTIMODAL CORRIDOR STUDY From Shady Grove Metro Station To Biggs Ford Road County Fairfax, County Legend mendit Algorit - Parantisticomo Project Area - Rock Care burning FIGURE 10:000 \$0:000 \$0:000 PLANE'S AT

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I-270/US 15 MULTI-MODAL CORRIDOR STUDY

A-D-81





15 I-270/US 15 Multi-Modal Corridor Study



Project Summary - December 2006

The I-270/US 15 Multi-Modal Corridor Study is a joint project between SHA and MTA. The project extends from the Shady Grove Metro Station in Montgomery County north to the US 15/Biggs Ford Road intersection area in Frederick County (approximately 30 miles). The transit component, known as the Corridor Cities Transitway (CCT), extends 14 miles from the Shady Grove Metro Station in Rockville through Gaithersburg and Germantown where it terminates at the COMSAT facility just south of Clarksburg.

The I-270/US 15 Study Team completed the Draft EIS and Public Hearing phase of the NEPA/Project Development Process in June 2002 and conducted Public Informational Open Houses, in both Montgomery and Frederick Counties, in June 2004 to update the public and introduce the Express Toll Lane (ETL) option. The Study Team is currently preparing an Environmental Assessment (EA); per the direction of FHWA and FTA, on the project changes since the public hearings. The EA will include detailed environmental technical analyses of any resources affected by the proposed ETL. It will also provide the ETL effects on CCT ridership, I-270 mainline traffic operations, traffic/environmental effects south of the study area (I-270 to the Capital Beltway), and will also display results of the public input

Also, an extensive modeling effort is under way involving MWCOG, MDOT, WMATA and local jurisdictions to determine CCT mode choice and potential combinations with the ETL option. This process requires significant transit model refinements necessary to evaluate the transit alternates using SUMMIT, as required by FTA. The goal is to develop ridership numbers that meet the rigors of SUMMIT. Results are expected Fall/Winter 2006/07. After the results are in, the remaining analyses can be preformed and thus complete the EA.

Current Action Items and Activities:

- Obtaining updated ETL travel demand and LOS information. Also computing estimated CCT ridership projections.
- Prepare the necessary land use and financial documentation for the FTA New Starts submittal.
- Extensive developer coordination in both counties.
- Evaluating a potential location for a CCT Operations and Maintenance facility.
- Investigating project needs for stormwater management, station development, and hiker/biker trail.
- · Preparing EA, including traffic models and environmental technical analyses.
- · Public Meeting tentatively scheduled for Fall/Spring 2007

Contact Information:

Mr. Russell Walto SHA Project Manager 410-545-8547 Toll-free 800-548-5026 Via email at rwalto@sha.state.md.us

Mr. Rick Kiegel MTA Project Manager 410-767-1380 Via email at rkiegel@mtamaryland.com

A-D-82 I-270/US 15 MULTI-MODAL CORRIDOR STUDY



3. Correspondence with Elected Officials

I-270/US 15 MULTI-MODAL CORRIDOR STUDY



C. Correspondence with Elected Officials

Correspondence with Elected Officials

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8/1/02	MD Senate — Senator Roesser	MTA	CCT service to Frederick.	52
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9/5/02	MTA	MD Senate — Sena- tor Roesser	Response regarding CCT service to Frederick.	56
9/24/02	MTA	Montgomery County Council	Response to Councilmember Dacek's transit comments.	59
12/10/02	SHA	Frederick County Board of Commis- sioners	Response to Commissioner Grey's comments on the project.	61
12/17/02	SHA	City of Frederick Mayor Dougherty	Response to City of Frederick's Resolution and Staff Report on the project based on the DEIS.	64
9/25/03	MTA	MD House of Del- egates - Represen- tative Cryor	Response to comments on Middlebrook Station and the potential for an on-site DOE station.	67
10/22/04	SHA	MD Senate - Senator Forehand	Response to proposal for redesigning Gude Drive in Rock-ville as MD 28.	69
7/12/07	SHA	City of Frederick - Alderman Smith	Response to proposal for construction of an exit ramp from southbound US 15 to westbound Opossumtown Pike.	72

JEAN W. ROESSER 15th Legislative District Montgomery County

Finance Committee
Joint Committee on Legislative Ethics

Co-Chairman

Joint Committee on Welfare Reform



THE SENATE OF MARYLAND Annapolis, Maryland 21401-1991 Annapolis Office
437 Miller Senare Building
Annapolis, Maryland 11400-0991
301-878-3169 - 410-841-3169
1-800-491-7121 Est 3169
Fax 300-858-3607 - 410-841-3607
E-Mail jum, romant@mente man.rod.

Home Address 10830 Fox Hunt Lane Potomac, Maryland 20854 301-259-9046 For 301-259-9105

August 1, 2002

Mr. Henry M. Kay, Director Office of Planning Maryland Transit Administration 6 Saint Paul Street Baltimore MD 21202-1614

Dear Mr. Kay:

I am most appreciative to you and Lorenzo Bryant for sending to me copies of the current plan for the Corridor Cities Transitway (CCT) for either light rail or a busway from Shady Grove to COMSAT. I have forwarded the copies that you sent me to several interested constituents who live in Germantown. While the CCT plan calls for it to end at COMSAT, I am convinced that it should extend to Frederick because future development will be intense in Urbana and northward. It would be wise to make definite plans for this extension to Frederick.

Would you please advise me of the Mass Transit Administration's position on CCT service to Frederick. With best wishes -

Sincerely.

Jean W. Roesser

JWR:elw

cc: Mr. Lorenzo Bryant, Project Manager, Maryland Transit Administration

Mr. Calbert Bowden

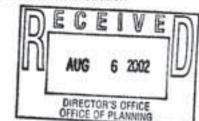
Mr. and Mrs. John Hickman

Mr. and Mrs. Michael Biggs

Mr. Paul Delgedillo

Ms. Krista Hughes

Mr. and Mrs. Barry Lyons







Parris N. Glendening Governor John D. Porcari Secretary Parker F. Williams Administrator

September 3, 2002

The Honorable Nancy H. Dacek Montgomery County Council Stella B. Werner Office Building 100 Maryland Avenue Rockville MD 20850

Dear Councilmember Dacek:

Thank you for your recent letter regarding the I-270/US 15 Multi-Modal Corridor Study. Your interest in the transit issues associated with this project and your support for light rail are appreciated.

The State Highway Administration (SHA) and the Maryland Transit Administration (MTA) are completing project planning studies for transportation improvements along the I-270/US 15 Corridor, as part of Maryland's I-270/US 15 Multi-Modal Corridor Study. The project team, which enjoys representation from Federal, State, and local governmental agencies, has been evaluating both transit and highway strategies. These evaluations focus on improving safety and relieving current and projected congestion along the I-270/US 15 Corridor in Frederick and Montgomery Counties.

The SHA and MTA are preparing detailed engineering studies to refine the alternates. As they do so, they will attempt to avoid or minimize impacts to the environment and surrounding communities. No alternate has yet been selected. This project is not funded for final design, right-of-way acquisition, or construction at this time.

Tentatively, we anticipate identifying a preferred SHA and MTA Alternate in Winter 2002/2003. The SHA and MTA will then prepare a Final Environmental Impact Statement and request approval of the document from the Federal Highway Administration and Federal Transit Administration in Fall 2003.

Please note that a copy of your letter has been forwarded to Mr. Henry Kay, MTA's Director of Planning. Mr. Kay will respond in more detail to your questions concerning the Corridor Cities Transitway.

RECEIV

SEP 0 4 2002

My telephone number is 410-545-0400 or 1-800-206-0770

RUMMEL, KLEPPER & KALL

Maryland Relay Service for Impaired Hearing or Speech 1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717 Street Address: 707 North Calvert Street • Baltimore, Maryland 21202 The Honorable Nancy H. Dacek Page Two

Thank you again for your interest in this study and for bringing your concerns to our attention. I trust that you will remain involved in this study and continue to offer comments. If you have any questions, please do not hesitate to contact Mr. Russell Walto, SHA's Project Manager, at 410-545-8547, 1-800-548-5026, or <a href="mailto:cwalto:cw

Sincerel

Parker F. Williams Administrator

e: Mr. Henry Kay, Director of Planning, Maryland Transit Administration

Mr. Lorenzo Bryant, Project Manager, Maryland Transit Administration (w/incoming)

Mr. Russell Walto, Project Manager, State Highway Administration (w/incoming)

I-270/US 15 MULTI-MODAL CORRIDOR STUDY
A-D-85



The Honorable Nancy H. Dacek Page Three

bcc: Ms. Kim Booker, Administrative Assistant, State Highway Administration OPPE5348

Mr. Brian Horm Rummel, Klepper & Kahl, LLC

Mr. Rick Kiegel, McCormick, Taylor & Associates

Mr. Steve Plano, Parsons Brinckerhoff, Quade and Douglas

Ms. Nanette Schieke, State Legislative Officer, Maryland Department of Transportation

Mr. Douglas H. Simmons, Director of Planning and Preliminary Engineering, State Highway Administration

Ms. Cynthia D. Simpson, Deputy Director of Planning and Preliminary Engineering, State Highway Administration

Richard Woo, Ph.D., Director of Policy and Research, State Highway Administration



MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION

Parris N. Glendening, Governor • Kathleen Kennedy Townsend, Lt. Governor

John D. Porcari, Secretary • Beverley K. Swaim-Staley, Deputy Secretary • Robert L. Smith, Administrator

RECEIVED

The Honorable Jean W. Roesser Senate of Maryland 437 Miller Senate Office Building Annapolis MD 21401-1991

SEP 0 5 2002

RUMMEL, KLEPPER & KAHL, LLP

Dear Senator Roesser:

Thank you for your recent letter supporting the extension of the current Corridor Cities Transitway (CCT) from the COMSAT site in Clarksburg to Frederick as part of the I-270/US 15 Multi-Modal Corridor Study. I would like to share with you the current status of the CCT plan and the Maryland Transit Administration's (MTA) position in this regard.

We agree that the CCT should extend to Frederick and accordingly maintain our recommendation in the study that the transitway continue to be preserved all the way to Frederick within the Washington metropolitan regions' Long-Range Plan and local master plans so the service could be extended in the future. Although the physical aspect of the transitway is no longer being considered north of COMSAT in this project, the master plan preservation would facilitate the implementation of the transitway beyond 2025 and help to support the intense development planned for the areas north of COMSAT.

The CCT alignment from COMSAT to Frederick was dropped at the end of the first phase, the Major Investment Study portion of the I-270/US 15 Multi-Modal Corridor Study. During this earlier stage of the project, the study results showed that for the nominal gain in ridership versus the capital construction, operational and maintenance costs expended, the CCT alignment to Frederick would not represent a prudent investment of transportation funds.

Our experience is that terminal stations that provide major parking capacity greatly improve the service effectiveness of a transit system. For this reason, we continue to propose COMSAT for the northern terminus since the parking proposed there will serve as a catchment point for the majority of commuters accessing the transitway from points north. According to our year 2025 travel demand forecasts, a significant number of morning transitway riders will gain access to the transitway at this location, and travel through to Shady Grove where they will connect with Metrorail.

Additionally, we have identified the COMSAT location as a candidate site for a transit vehicle maintenance yard and shop. This site therefore serves as a potential location for a critical component of the CCT that is necessary to support and address the operational requirements in extending the transitway north of COMSAT to Frederick in the long-term.



The Honorable Jean W. Roesser Page Two

At this time we are continuing to address public and agency comments on the Draft Environmental Impact Statement and from the June 25 and June 27 public hearings. The conclusion of the project planning study is anticipated in 2003 with the completion and distribution of a Final Environmental Impact Statement for the preferred alternate and final approval sought from the Federal Highway Administration and Federal Transit Administration. At this point the project will become a candidate for funding final design, right-of-way acquisition and construction.

We will focus on ways that the Clarksburg Town Center can be served by the CCT within the 2025 timeframe during the detailed engineering phase of the project. This allows us to competitively move forward with other national rail projects and adhere to the current project schedule for federal and state Location/Design approvals, while establishing the initial groundwork for any ultimate extension to the City of Frederick.

Thank you for your interest in this project and the opportunity for us to clarify our position regarding the CCT northern terminus in the I-270/US 15 planning study. If you should have any questions, please do not hesitate to contact me at 410-767-3787.

Sincerely

Henry M. Kay, Director Office of Planning

1000

Mr. Lorenzo Bryant, Project Manager, Maryland Transit Administration

Mr. Steve Plano, Project Manager, State Highway Administration

Mr. Robert L. Smith, Administrator, Maryland Transit Administration

The Honorable Jean W. Roesser Page Three

bcc: Mr. Tony Brown, MTA

Mr. Robert Hellauer, MTA

Mr. Brian Horn, RK&K

Mr. Douglass Simmons, SHA

Ms. Kelly Tyler, MTA

Mr. Russell Walto, SHA

I-270/US 15 MULTI-MODAL CORRIDOR STUDY
A-D-87





MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION

Parris N. Glendening, Governor • Kathleen Kennedy Townsend, Lt. Governor John D. Porcari, Secretary • Beverley K. Swaim-Staley, Deputy Secretary • Robert L. Smith, Administrator

September 24, 2002

The Honorable Nancy H. Dacek Montgomery County Council Stella B. Werner Office Building 100 Maryland Avenue Rockville MD 20850

Dear Councilwoman Dacek:

Thank you for your letter supporting light rail as the transit mode for the Corridor Cities Transitway (CCT). We appreciate your continued involvement and interest in the I-270/US 15 Multi-Modal Corridor Study and related transit issues. I know you have already received a letter from State Highway Administrator Parker Williams, and I would like to take the opportunity to respond in more detail to your comments on the transit alternatives.

The purpose of the CCT is to accommodate both local and through trips of all purposes while supporting transit oriented land uses in the county. Our use of home-based work trips to derive total daily ridership is consistent with the Metropolitan Washington Council of Government's modeling procedures to which we are required to adhere in our planning activities when Federal funding is anticipated for construction. However, we agree with your belief that a transit service such as the CCT can attract non-work trips from land uses along its route. This has certainly been our experience with the Baltimore Light Rail Line. Accordingly, we will take your concerns into careful consideration as we recommend which transit mode would best serve the communities.

With regard to your concern about the Focus Group's preference for a six-minute peak frequency for light rail, although the Draft Environmental Impact Statement (DEIS) indicates eight minutes, a range of six to eight minutes was tested in the ridership model. The DEIS is supported by a minimal level of operational analyses. There will be many opportunities to revisit and find ways to optimize the operational aspects for increased ridership both in the Final Environmental Impact Statement as well as the final design phase if the project is subsequently funded. At this time, the project is funded through the project planning stage only.

Thank you for bringing your concerns to our attention and we trust that you will remain involved in this study and continue to offer comments. If you have any questions, please do



The Honorable Nancy H. Dacek Page 2

not hesitate to call Mr. Russell Walto, SHA's Project Manager, at 410-545-8547, or Mr. Lorenzo Bryant, MTA's Project Manager, at 410-767-3754.

Sincerely

Henry M/Kay, Directo Office of Planning

Mr. Lorenzo Bryant, Project Manager, Maryland Transit Administration

Mr. Robert Smith, Administrator, Maryland Transit Administration

Mr. Russ Walto, Project Manager, State Highway Administration

Mr. Parker Williams, Administrator, State Highway Administration





Parris N. Glendening Governor Joths D. Porcari Secretary Parker F. Williams Agents after

December 10, 2002

The Honorable David P. Gray Frederick County Board of County Commissioners Winchester Hall 12 East Church Street Frederick MD 21701

Dear Commissioner Gray:

Thank you for your letter regarding the I-270/US 15 Multi-Modal Corridor Study currently underway by the State Highway Administration (SHA) and Maryland Transit Administration (MTA), and for sharing your support to build Alternate 3 and Bus Rapid Transit (BRT) as the transit mode. We appreciate your comments and offer the following information in response.

The Board of County Commissioners indicates that Frederick County would support the selection of Alternate 3, with modifications. These would include the direct access to high occupancy vehicle (HOV) ramps from the proposed Shockley Road-Spectrum Drive Bridge as included in Alternate 5C. Your comments have been noted and will be considered during the Alternate selection process. If a Build Alternate is selected, SHA will continue to work with Frederick County to develop typical sections and design elements along US 15 that are community sensitive and that meet the needs of the project.

A high quality transit system is critical for both the success of the transitway and for the communities it serves. As stated in your letter, you prefer the mode that does not require a passenger transfer at Comsat. It appears that your decision to select BRT is based on the assumption that Frederick County transit riders would continue on to Shady Grove, via the Corridor Cities Transit (CCT), using the same bus that picked them up at their point of origin. This is true, however, only in a few cases. Several feeder bus routes are proposed in Frederick County to serve the CCT and points south. They would use a combination of I-270, the CCT, or local streets to reach their destination. Bus service in the Light Rail Transit (LRT) option would give Frederick County riders several options for a one seat ride to Shady Grove or to other Metro stations. Commuter bus service from Francis Scott Key Mall would continue to provide express service. This service is expected to improve with the new I-270 HOV lanes. MARC service of Frederick County would also continue in both BRT and LRT options. The project team will take your comments into consideration as it decides which transit mode would best serve the communities in a safe, environmentally friendly, and economical manner.

E RECEIVED

410-545-0400 or 1-800-206-0770 FEB 2 0 200 2

Maryland Relay Service for Impaired Hearing or Speech 1-800-735-2258 Statewide Toll Free

My telephone number is

MEPPER & KAHL, LL

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-9717 Street Address: 707 North Calvert Street • Baltimore, Maryland 21202 The Honorable David P. Gray Page Two

The SHA and MTA are preparing detailed engineering studies to refine the alternates. They will attempt to avoid or minimize impacts to the social, economic, natural, and cultural resources, including the communities adjacent to I-270 and US 15. Detailed environmental studies, including coordination with appropriate federal, state, and local interested parties and agencies will be conducted in accordance with NEPA for the Selected Alternate. This project is not funded for final design, right-of-way acquisition, or construction at this time.

Tentatively, we anticipate identifying a preferred SHA and MTA Alternate in Winter 2002/2003. The SHA and MTA will then prepare a Final Environmental Impact Statement and request approval of the document from the Federal Highway Administration and Federal Transit Administration in Fall 2003.

Thank you again for your interest in this study and for bringing your recommendations to our attention. We will ensure that you will remain involved in this study. If you have any questions or concerns, please do not hesitate to contact Mr. Russell Walto, SHA's Project Manager, at 410-545-8547, 1-800-548-5026, or rwalto@sha.state.md.us or Mr. Lorenzo Bryant, MTA's Project Manager, at 410-767-3754, or lbryant@mta.state.md.us. Either will be happy to assist you. Of course, please do not hesitate to contact mo-directly, if you prefer.

Parker F. Williams Administrator

cc: Mr. Lorenzo Bryant, Project Manager, Maryland Transit Administration (w/incoming) The Honorable Jennifer P. Dougherty, Mayor, City of Frederick Mr. Henry Kay, Director of Planning, Maryland Transit Administration

Mr. Russell Walto, Project Manager, State Highway Administration (w/incoming)

I-270/US 15 MULTI-MODAL CORRIDOR STUDY





Parris N. Glendening Governor John D. Porcari Secretary Parker F. Williams

Agmin strator

December 17, 2002

The Honorable Jennifer P. Dougherty Mayor, City of Frederick 101 North Court Street Frederick MD 21701

Dear Mayor Dougherty:

Thank you for sending the City of Frederick's Resolution and Staff Report, which was generated from the review of the I-270/US 15 Multi-Modal Corridor Study Draft Environmental Impact Statement (DEIS). Your interest in the transit issues associated with this project and your support for Alternates 3A and 3B are appreciated. We offer the following information in response.

The State Highway Administration (SHA) and the Maryland Transit Administration (MTA) are preparing detailed engineering studies to refine the alternates. As they do so, they will attempt to avoid and minimize impacts to social, economic, natural and cultural resources. This would include the communities adjacent to 1-270/US 15, such as the area between Rosemont Avenue and Patrick Street. Detailed environmental studies of the selected alternate, including coordination with interested parties and appropriate agencies at the federal, state, and local levels, will be conducted in accordance with the National Environmental Policy Act (NEPA).

Transportation System Management (TSM) and Transportation Demand Management (TDM) strategies are considered under all "build" alternates, throughout the study area. These include intersection/interchange improvements, additional park-and-ride spaces/lots, hiker/biker trails, improved telecommuting programs, encouragement of flexible work hours, and Intelligent Transportation Systems (ITS) Technology.

Based on the level of service (LOS) analyses developed for the freeway links within the City of Frederick, US 15 fails under the Baseline and TSM/TDM alternate, Alternate 2 (specifically in the southbound direction in both morning and evening peak travel periods). All of the other "build" alternates operate at a satisfactory LOS on the mainline freeway segments. Please also note that all of the proposed "build" alternates include continuous auxiliary lanes between interchanges, including the Rosemont Avenue and Patrick Street interchanges along US 15.

Your comments about access to Fort Detrick have been forwarded to Mr. John Concannon, Assistant District Engineer for this area, for a traffic signal study at the US 15 southbound exit ramp at 7th Street. If you have any questions pertaining to this issue, please feel free to contact Mr. Concannon directly. He can be reached at 301-624-8141.

JAN 0 7 2003

410-545-0400 or 1-800-206-0770 My telephone number is __

Maryland Relay Service for Impaired Hearing or Speech 1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717 Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

The Honorable David P. Gray Page Three

bcc: Ms. Kim Booker, Administrative Assistant, State Highway Administration OPPE5348

Mr. Robert Fisher, District Engineer, State Highway Administration

Mr. Brian Horn, Rummel, Klepper & Kahl, LLC

Mr. Rick Kiegel, McCormick, Taylor & Associates

Mr. Steve Plano, Parsons, Brinckerhoff, Quade, and Douglas

Ms. Nanette Schieke, State Legislative Liaison, Maryland Department of Transportation

Mr. Douglas H. Simmons, Director of Planning and Preliminary Engineering, State Highway Administration

Ms. Cynthia D. Simpson, Deputy Director of Planning and Preliminary Engineering, State Highway Administration



The Honorable Jennifer P. Dougherty Page Two

A high-quality transit system is critical, both for the success of the transitway and for the community. The system must prove to be a fast and reliable alternative to driving and must be accomplished in a cost-effective manner, as funding sources are limited. The northern terminus for the Corridor Cities Transitway (CCT) is planned for Comsat, where parking facilities are planned to handle the expected needs of the CCT station. We agree that the CCT should ultimately extend to Frederick, and we maintain our recommendation that the transitway continue to be preserved all the way to Frederick within local master plans so that service could be extended in the future.

Your comments concerning the proposed interchange improvements to the Monocacy Boulevard and Biggs Ford Road interchanges along US 15 have been noted. The SHA will continue to work with the City of Frederick and Frederick County during the planning phase. If a "build" alternate is selected, SHA will continue to coordinate with the City of Frederick and with Frederick County during the design phase, to develop typical sections and design elements along US 15 that are community sensitive and meet the need of the project.

Tentatively, we anticipate identifying a preferred SHA and MTA alternate in Winter 2002/2003. The SHA and MTA will then prepare a Final Environmental Impact Statement and request approval of the document from the Federal Highway Administration and Federal Transit Administration in Fall 2003. This project is not funded for final design, right-of-way acquisition, or construction at this time.

Thank you again for your letter. If you have any questions, please do not hesitate to contact Mr. Russell Walto, SHA's Project Manager, at 410-545-8547, 1-800-548-5026, or <a href="mailto:rwa

Parker F. Williams Administrator

Mr. Lorenzo Bryant, Project Manager, Maryland Transit Administration (w/incoming)
 Mr. Russell Walto, Project Manager, State Highway Administration (w/incoming)

The Honorable Jennifer P. Dougherty Page Three

c: Ms. Kim Booker, Administrative Assistant, State Highway Administration

Mr. Brian Horn, Rummel, Klepper & Kahl, LLC

Mr. Henry Kay, Director of Planning, Maryland Transit Administration

Mr. Rick Kiegel, McCormick, Taylor & Associates

Mr. Steve Plano, Parsons Brinckerhoff, Quade and Douglas

Ms. Nanette Schieke, State Legislative Liaison, Maryland Department of Transportation

Mr. Douglas H. Simmons, Director of Planning and Preliminary Engineering, State Highway Administration

Ms. Cynthia D. Simpson, Deputy Director of Planning and Preliminary Engineering, State Highway Administration

Mr. James Wynn, Assistant Division Chief, Project Planning Division, State Highway Administration

I-270/US 15 MULTI-MODAL CORRIDOR STUDY
A-D-91





MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION

Robert L. Ehrlich, Jr., Governor • Robert L. Ranagan, Secretary • Robert L. Smith, Administrator

September 25, 2003

The Honorable Jean B. Cryor The Maryland House of Delegates 226 Lowe House Office Building Annapolis MD 21401-1991

Dear Delegate Cryor:

I am sending this letter on behalf of Maryland Transportation Secretary Robert F.

Flanagan as follow-up to his August 15, 2003 letter regarding the proposed Corridor Cities
Transitway (CCT) Middlebrook Station and your suggestion for the Department of Energy
(DOE) campus as a more suitable, alternative station location. Since that initial response, project
team representatives from the Maryland Transit Administration, the State Highway
Administration and Montgomery County, as well as Montgomery County Council staff, met with
officials from the DOE to discuss the viability of this site for a CCT station.

DOE representatives remain generally opposed to an on-site station and have ongoing concerns regarding the proximity of the transitway to its facilities, citing issues similar to those raised during past meetings such as security, access and aesthetics. However, they are willing to share the project and raise these issues with their senior staff and the General Services Administration, owners of the facility. In order to facilitate their discussions, we are sending preliminary engineering plans of the CCT alignment showing the possible right-of-way implications and representative illustrations/photographs of typical light rail and bus rapid transit systems. We will continue to share the outcome of all coordination efforts regarding this issue with you.

If you have any questions, please do not hesitate to call me at 410-767-3787, toll-free at 1-888-218-2267.

Sincerely,

Henry M Kay, Director Office of Planning

Mr. Robert L. Smith, Administrator, MTA

The Honorable Jean B. Cryor Page 2

bcc: Lorenzo Bryant, Maryland Transit Administration

Steve Plano, Parsons Brinkerhoff

Russell Walto, State Highway Administration

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SKA State Highway Administration S

Robert L. Flansgan, Secretary
Neil J. Pedersen, Administrator

Maryland Department of Transportation

October 22, 2004

The Honorable Jennie M. Forehand Senate of Maryland 223 James Senate Office Building 110 College Avenue Annapolis, Maryland 21401-1991

Robert L. Ehrlich, Jr., Governor

Michael S. Steele, Lt. Governor

Dear Senator Forehand:

At the briefing for Montgomery County elected officials on the draft 2005-2010 Consolidated Transportation Program (CTP) earlier this month, you asked me about the possibility of redesignating Gude Drive in Rockville as MD 28. I appreciate the opportunity to respond to you on this matter.

While this proposal makes sense from a regional and functional standpoint, there are several issues that would need to be addressed in order to implement this suggestion.

- Based on an earlier request from you, SHA undertook a study in Fall 2000 to determine the feasibility of an interchange at I-270 and Gude Drive, and whether it would alleviate traffic congestion along MD 28 at I-270. The study included HOV median ramps as well as a traditional urban diamond interchange. The HOV ramps would provide minimal diversion, and the urban diamond would be very costly and may adversely impact adjacent businesses.
- Without an interchange at I-270 and Gude Drive, there is no access for regional traffic to use Gude Drive. An interchange at this location is not included in the CTP or on the County's transportation priorities list.
- Support would be needed from both the City of Rockville and the County, and the project would need to be placed on the County's priority list.
- Approval from the Federal Highway Administration (FHWA) for a new interchange at this location would be required. The I-270/Shady Grove Road interchange is 4,000 feet north of Gude Drive. Although the FHWA typically requires a one mile interchange spacing on the interstate system, this is not expected to be an insurmountable obstacle because the interchange ramps would be to and from collector-distributor roads on I-270.
- If Gude Drive was to become part of the State's highway system, an agreement with the County to bring the road to state standards would need to be reached.

The Honorable Jennie M. Forehand Page Two

Thank you again for your interest in this matter. If you need further assistance, please do not hesitate to contact Mr. Raja Veeramachaneni, our Director of Planning and Preliminary Engineering, at 410-545-0412, 1-888-204-4828, or reveramachaneni@sha.state.md.us. He will be pleased to assist you. Of course, you should never hesitate to contact me directly, if you prefer.

Sincerely,

Riel & Person

Neil J. Pedersen Administrator

Mr. Raja Veeramachaneni, Director of Planning and Preliminary Engineering, SHA Mr. Charlie K. Watkins, District Engineer, SHA

I-270/US 15 MULTI-MODAL CORRIDOR STUDY



The Honorable Jennie M. Forehand Page Three

bcc: Mr. Michael J. Haley, Chief of Regional and Intermodal Planning, State Highway Administration

Ms. Marlyn D. Hill, Administrative Assistant, State Highway Administration
Ms. Nanette Schieke, State Legislative Officer, State Highway Administration

Mr. Douglas H. Simmons, Deputy Administrator for Planning and Engineering, State Highway Administration

Ms. Linda Singer, Legislative Liaison, State Highway Administration Mr. Glen A. Smith, Regional Planner, State Highway Administration Marries O'Malley, Governor | State Highway Administration S

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

Maryland Department of Transportation

July 12, 2007

Alderman C. Paul Smith City of Frederick 101 North Court Street Frederick MD 21701-5415

Dear Alderman Smith:

Thank you for your letter sharing your suggestion that State Highway Administration (SHA) consider the construction of an exit ramp from US 15 southbound to westbound Opossumtown Pike.

As indicated during our telephone conversation, I agree that the construction of the ramp would improve operations at this location but the project would impact the Veterinary Clinic on Opossumtown Pike and would make the project cost prohibitive to add into our current Motter Avenue Bridge replacement project that is currently funded for design. Additionally, an exit ramp at this location would introduce a weave on southbound US 15 between MD 26 and Opossumtown Pike that may be problematic given the short distance between the interchange ramps. We believe that additional capacity proposed for the new bridge, coupled with the construction of the City of Frederick's proposed project to extend the proposed bridge typical section of six lanes westward to the intersection of Thomas Johnson Drive, will improve the operations in this area. We will continue to monitor traffic operations at this location once the new bridge is constructed to evaluate if additional opportunities exist to improve operations.

Thank you again for your suggestion to improve operations along US 15 and its intersection with Opossumtown Pike. Please do not hesitate to contact me if you have any questions or require any additional information. I will be happy to assist you.

> David J. Coyne District Engineer

Mr. John Communes, Assistant District Engineer Teaffin

Mr. John Concannon, Assistant District Engineer-Traffic, SHA
Mr. Mark Crampton, Assistant District Engineer- Project Development, SHA

Aldermen Marcia A. Hall, City of Frederick

The Honorable William J. Holtzinger, Mayor City of Frederick

Alderman Alan E. Imhoff, City of Frederick Alderman David Koontz, City of Frederick

Mr. John Narer, Bridge Design, SHA

Alderman Donna Kuzemchak Ramsburg, City of Frederick

Mr. Russell Walto, Project Manager, SHA



4. Select Agency Correspondence from 2002 Draft Environmental Impact Statement

I-270/US 15 MULTI-MODAL CORRIDOR STUDY



D. Selected Agency Correspondence from the 2002 Draft Environmental Impact Statement

Select Agency Correspondence from 2002 DEIS

DATE	FROM	то	SUBJECT
10/8/96	USACE	FHWA	Responding affirmatively to invitation to be a cooperating agency.
6/17/97	EPA.	FHWA	Responding affirmatively to invitation to be a cooperating agency.
6/17/97	SHA	M-NCPPC	Detailing the retention of Combination Alternates A and B for further study.
7/22/96	City of Gaithers- burg	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).
4/18/96	Fred Co DPW	SHA	Regarding the significance and usage of Rose Hill Manor Park and Urbana Community Park.
2/21/02	SHA	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.
2/21/02	SHA	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.
3/22/02	MDNR	SHA	Regarding the significance and uses of Urbana Lake Fish Management Area and Seneca Creek State Park
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.
11/6/96	NPS	SHA	Providing MNB information.
3/17/98	SHA	NPS	Responding to the NPS email of 10/29/98.
10/29/98	NPS	SHA	Comments on related 106 process review.
1/27/99	NPS	SHA	Comments on interagency scoping presentation.
2/12/99	SHA	NPS	Responding to NPS comments.
3/25/02	NPS	SHA	Commenting on the preliminary DEIS (not in DEIS).
4/17/02	SHA	NPS	Responding to NPS 3/25/02 letter.

1-270/US 15 MULTI-MODAL CORRIDOR STUDY





DEPARYMENT OF THE ARMY THE TIMENE INSTRUCT U.S. ARMY COMPS OF ENGINEERS P.O. AGE 1715 BALTIMORE, MD 21200-1715

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Operations Division

Scholent: (CENAN-OP-RX (MD SMA(1-270)US 15 Multimodel Study from Shady Grove Motro Stanion to (liggs Ford Road) 95-30674-2

Mo. Susan Binder Division Administrator C.S. Department of Themsportation Federal Highway Administration The Motonda- Suite 220 711 West 40th Street Baltimore, Maryland 21211-2167

Dear Ms. Bunder:

This is in response to your letter dared only 31, 1996, requesting the Daltimore District, C.S. Army Corps of Engineers (Corps) to participate as a compensating agency in the preparation of the Environmental Impact Statement to: the I-270/HS (Smiltimodal Transportation Study in Frederick and Montgomery Constitut, Maryland.

The District will be pleased to serve as a cooperating agency in the development of the document. If you have any questions on the motion please call make My Meg Caffney Smith of this obtained (410) 962 1841.

Simpulely.

Maith A Bacris / Chief. Special Pronests Permit Education This page intentionally left blank.

VII -A-104

I-270/US 15 MULTI-MODAL CORRIDOR STUDY
A-D-97





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION SI
BA1 Chemistry Building
Philodophia, Pennsylvania 18107-4431
AUM | 7 1997

Mrs. Sutan 1 Binder
Division Administrator
Federal Highway Administrator
The Rosenda Saint 720
711 West 40th Street
Baltimore, 4fD 21211

Detr Mrt. Bester

This better is in response to your request for the Envisormental Protection Agency (CPA) to produce the a Cooperation Agency is the proporation of an Enveronmental Impact Statement for the L-27BAU S 15 Modifi-Modal Study, Shady Grove Metro Station to Begin Ford Road.

We welcome the opportunity to puritupate as a Cooperating Agency in the development of the project. Our role as a Cooperating Agency will consult of providing expended ecopoing comments on general National Environmental Folicy Act (NEPA) compliants and Section 404 issues. Generally, BPA is requested as a Cooperating Agency due to one Special Empirity in the season NEPA compliance and the Section 404 (B) (1) Guidelines. BPA site has discretifying your authority for the Section 404 permit under Section 404 (e) of the Clean Water Act. Our responsibilities and a Cooperating Agency do not precently our regulatory and coview inspectabilities under Section 309 of the Clean Air Act and Section 404 of the Clean Water Act.

Thank you for your requen and if you have any questions on this maner planted exempt me or 715-566-2721 or Durintle Algusi of my staff in 215-566-2722

Sec.

Roy E. Dennett, Jr., Depart Chief Environmental Programs Breech

relia, P.OL

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VII -A-38





Partis M. Carri to ding Commun David U. We stood Accept History III To Lights Accept them

June 10, 1997.

Mr. John Majibage Painning Coordinator Tak Maryland-Maiional Capital Park and Planning Commission 8787 Georgia Avenue Salver Spring AID (20910-8786)

Dear Mr. Matthiay:

Teach you for your letter and comments on the I 250/US 15 Multi-Model Corridor Study recommendations from March 26. Experience your involvement in the U270/US 15 Mudy.

Since the Magali 26 deaft recommondations, the Sindy Team has refined these startions non-mineralizations further said they now include carrying both Combination Alternate B, along sigh the Baseline Alternate, forward for further analysis. This clinitates the section conformation were the separations of the Corridor Cutter Transaction for the rest of the study, as well as abilting funding lattered SEA and Aff A for this Major Investment Study (AIS) phase of the study.

Combination Alternate B includes the premium has service along the 1970 High Occupancy Vehicle (HOV) thest, with special slip ramps into intermedal trainer statistics that the corridor at Warkins Mill Road, Gormantown Road, MD 125, MD 75 Incended and MD 55. While the impacts to the HOV and but bely slip ramps for this premium has service takenot; yet been quantified, the Study Team believes that this trainer service serves a different marker than the Councy's Contrator Cities Transitives and should be derived forward for further analysis. In addition, while the public was able to review and consecut on this promoter has service per secural at both the March public directions and the between From George receiving, they will have additional opportunities as accomeny on the study. Throughout the internaces development, newspecture, Focus George meetings, Verbandorer association markings and a Public Hearing wall all the growhead.

Minjand Pelag Sist, to be individed the study of Speech 5 300 735-3554 Septembrilla Factor

Mailing Address - A.O. Bbc /17 - Sellimore, ND 7/203-6717 Street Address: 707 Most? Entred - Ballingra Maryland 1/262 Mr. John Mathias Page Two

In the next several meanths, additional mayed demand analyses will be constanted to evaluate these Constantation Attentions, as well as to run a teamit-based sensitivity test. Transit is an imagen, overgonate of the 1-270008-15 MethoMedal Socky and we remain continuited, that various tryits strategies, such as 2007, has service and a transitivity, will be estaded for designal sody. In addition, we are recommended that the eight-of-way he preserved for the Contidur Chies Transitivity tested and Evaluation that the eight-of-way he preserved for the Contidur Chies Transitivity tested and alternates are recommended for detailed study, a full originating and environmental assessment will be undertaken. Each of the alternates will be evaluated based on the study goals, which are to enhance each lift preserve/protest/enhance the devironment, support orderly and decomming growth, improve goods movement and optimize public measurems.

Thank you again and I look forward to your involvement throughout the study. If you have any additional conserver, please feel free to call the at (410) 545-8547 or (cd) free in Mary and at (800) 548-9026.

Very guly years,

Louis H. Ege, Jr., Deputy Director Office of Plantang and Pretiminary Engineering

Metrillo D. Seriesan
Project Menager
Project Pauring Division

 Mr. Subhir Alkhaith, Profest Manager, Mess Traces Administration (North automorg)

Mr. Lauss M. Rge, Ir.: Deputy Director, State Highway Administration Mr. Harvey Flockner, Planning Director, Mass Transic Administration (with registrang)

Mr. Richard Hawthorne, Transportation Section Chief, Maryland National Capital Park and Planning Commission

Mr. Michelle U. Boffman, Project Manager, State Highway Administration.

Mr. Neil J. Pedersen, Director, State Highway Admirastration.

Mr. Alan H. Straus, Project Manager, State Highway Administration

I-270/US 15 MULTI-MODAL CORRIDOR STUDY





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

City of Carthenburg + 102 South Frederick Avenue, Carthenburg, Manifold 20577-2325 (301) 258-6350 + FAX (301) 948-6364 + TDO (301) 258-6353

marine.

Styries I, 454a Carabbar E, Essa Hillery A, Essa Compute M, Bilder DEVENAGED DESCRIPTION

around the Metropolitan Grove MARC Station and the future Shady Grove-Clarksburg Transitway. The Master Plan designates the easterly portion of the property along 1-270 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 1-270 in anticipation of future development.

Please do not hesitate to contact me at 258-6356 if further information is required.

Sincerely,

Priscilla Chambers Assistant Director

Department of Parks and Recreation

VII-A-32





DEPARTMENT OF PUBLIC WORKS Bureau of Parks and Recreation Frederick County, Maryland

DB Nink Marker Street * Federal, Marsland 21701 * CRU 199-1640 * SAX CRU 199-1640.

DENETOR DESIGNATION

BORDAU CHIEF Other L. Kinghan

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.

and as Knowled Stew

"Serving with Pride Countywide"

Page 2

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

Assistant Administrati

Enclosures (2) cc: file Gil Kingsbury Colin Clevenger

VII -A-98

I-270/US 15 MULTI-MODAL CORRIDOR STUDY
A-D-101



E. Minutes - Interagency Review & Coordination Meetings

MEMORANDUM

TO Ms. Cynthia D. Sampson.

Dejuty Director
Office of Planning and
Peclinumary Engineering

1/ROM: Steve Plune

Project Managet for Project Planning Division

DATE: February 20, 2002

SCBJECT. Project Number #8:192811.

1-270/US 15 Multi-Modal Comdon Study Shady Grove Metro Station to Biggs Ford Road

RF Toly 17, 2001 Department of National Retification Consideration Meeting.

Members of the U270/US 15 project from their with Maryland Department of Natural Resources (DNR) representatives on Turnday, July 17, 2001 to review the possible impacts to Senseca Creek. State Park from the proposed I-270 highway and translaway alternates. The following people were in alternative:

Jeremy Book SHA - PPD

Waylor Brown MD Department of Natural Resources

Angie Elichart R.K.&.K.

Abno Elrays SHA - PPD Environmental

Mark Epstein RKAR Denck Harlahan RKAR Dan Johnson FHWA

Stave Plano Parsons Brindverhoff

Charlie Citemphie McConnack, Taylor & Associates, Inc.

The presting began at 9 00 AM with basel introductions. The following at a summary of the topics $6000\,\mathrm{MeV}$

Schedule/Status of Study

Steve Plano pavo a brief overview of the study's opcoming activities, and distributed a sheet summarizing the study's exagor indestroes (see attached). The Deaft Environmental impact Statement is expected to be completed in Spring 2002, and a Listabilian/Design Public Hearing is

Ms. Cyathia D. Simpron Department of Natural Resources Coordination, Meeting Page 2

Elsa Entocipieted in Spring 2002. The SHA expects to volcate Preferred Afternate in Spring 2003. Lenation/Design appearable are expected in Surrainer/Fuil 2003.

Pack Boundary Confirmation

Seeve Plano presented the 1-270 alternates mapping and asked DNR to conform the Source Creek. Since Park boundary as presented on the mapping for workness.

Walter Brown suggested that the Senet's Corek Covernway Tearl should be couplayed on the magning. Thus nations unpassed halong trail extends through the park from MD 355 to the Potomac River. Although there are no plans to upgrade the trul to a multi-ose facility. DNR suggested that thus that park to upgrade the trul to a multi-ose facility. DNR suggested that thus that the trul story that the proposed Complet Count Transitivity (CCT).

Alternates Bring Evolution

The 1-270 hand alternates include both highway and transit components. Within the area of the School Cleck State Pack boundary, the highway components propose convening the explaing mode southbound general purpose lane on 3.270 to an BOV lane, as well as constructing a two-lane Collector Distributes (C-D) readway and one autothary lane (between Whites Mill Read and Middlebrook Road) in each discussor. The highway widening alternates under consideration toyle in outside widening along 1.270 within the park boundaries. In order to be consistent with the 1-2700W.ckins Mill Road interchange study, the 1-2700US 15 Multi Middle Corticor Study will paragraphents the winhbound painted C D typical section and for eastern mainline alignment; the Trips section will addition impacts to the park, however, the 1-2700US 15 Study will could in additional park impacts than stated in the Washins Mill Road Study due to the C-D lane, being extended through the park, the proposed not become study could be suitable and unclearly lates, and the proposed teans toway alignment to the west.

The transaction potential of the build alternates propose either light Raid Transit (LRT) or Busic Rapid Transit (BRT) on the CCT diagrammit. The arghetor-way requirements pursented in the metering included imports associated with the CCT diagrammit, which runs parallel to and would 1,276 within the park boundary. Sieve stated that the master planning clock provides a 20 to 25 year time frame for construction and its board on a general master plan study by Meetgomery County, detailed angustrang work stall adds to be completed.

Potential Jimpacco

The study team distributed a speed summar sing potential eight-of-way imputes to Senece Creek. State Park both with and withour retaining walls.

fighway Impacti

The total prenominary pre-avaidance (as retaining wolfs) highway tenport to Seneta Creek State. Park is appropriately 8.1 ages, based on a 25 foor buffer distance from the cultiful line to the proposed tight of easy line. If remaining walls were provided along the length of the park, this would min more park right-of-way impacts to approximately 3.2 cores. These remaining walls



E. Minutes - Interagency Review & Coordination Meetings

Ms. Cyrithia D. Simpson Department of Natural Resources Coordination Meeting Page 3

would range in height from approximately 24 feet high on the northlyhead side to approximately 19 feet high on the southhound ande, and would vary in visibility from the soud 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 Scorea Greek. Walter Brown stated that DNR would most likely favor retaining walls over grading since retaining walls would reduce tight-of-way impacts.

Iransmery

The transitivity right-of-way impact to Seneca Creek State Park is approximately 5.8 acres.

Highway and Transitwa

The preliminary pre-avoidance (no retaining wall) combined highway and transitivaly right-of-way impact to the park is approximately 1.1.1 series due to overlapping impacts between the highway and transit alternates. Please note that the design of both the highway and transitivaly is this acction are preliminary and the right-of-way impacts may be refined as the study progressor.

Walter Brown stated that Seneral Creek State Park contains approximately 7,000 acres, and noted that the right-of-way impacts from the 1-270 study seemed reasonable. For right-of-way impact integration, DNR would require a 1:1 replacement of land taken, and the replaced hand should be contiguous to the park. Walter Brown noted that the park is a widdle substat, and that whitershed and right-of way impacts should be nationabled. Walter Brown will consider the nord to address any cultural view sheel impacts to the juris.

Study from members explained that the stone water management pond on the cast side of 1.270, month of Caret Sepress Crock, would most likely be impacted by the proposed highway widening. Stave stated that the study team will continue to review right-of-way impacts in this area to determine whether a partition of the pood will be impacted or if the tribite pood will need to be taken. Walter Howe confirmed that DNR owns this states water many general pood.

Follow Up Jurgo

- Subsequent to the meeting. Walter Brown has confirmed park boundaries and the location of the Senera Creek Greenway Trail
- Watter Brown to provide any view shed assess to Anno Blows.
- RK6K//B to continue evaluating the right of way impacts through the park based on the proposed highway and transitively oftenues.

If you have any questions, please contact Steve Plane, the project manager for SHA, by telephone at 410-545-5547, by enoul or plane@phworld.com, or the environmental managet.

Anne Eleays at 410-545-8587

Autobasens

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1/11 17 24

I-270/US 15 MULTI-MODAL CORRIDOR STUDY
A-D-103

A-D-104



I-270/US 15 MULTI-MODAL CORRIDOR STUDY

E. Minutes - Interagency Review & Coordination Meetings

MEMORANDUM

My Cyethia D. Simpson.

Deputy Director Office of Planning and Preliminary Engineering

FROM Sieve Plano

> Project Manages for Project Planting Division.

February 21, 2002 DATE

Project Number FR192B11 50080ECT

> 1-970/08 13 Midd-Modat Comdor Study Shady Grave Metro Station to Biggs Ford Road

September 5, 2004 Maryland National Capital Park and Planning Commission.

Coordination Meeting

Members of the I-2700CS, 15 project team that with Maryland National Capital Park and Planning Commission (M. NCPPC) representatives up Wodnesday, September 5, 2001 to review the possible explacts to Black Hell Regional Park from the proposed 1,270 highway and transitivaly alternates. The following people were in attenuable.

SHA - PPD Jesemy Beck Nathleen Dearstone M-NCPPC M-NCPPC See Edwards Angle Etrhart RK&K

SILA - PPD Environmental Apper Elegys

M-NCPPC - Countywide Planning John Heach

Dan Johnson

Derick Hallahan

M-NCPPC = 1-270 Cartidati Kases Kumm Morris M-NCPPC - Black Iffil Region Jins McMahon MINCPPC - Black Hill Region Rosemary Nichols

Parsons Hornokernoff Steve Plano SIIA - PPD Russell Walter

The meeting began as 10 10 AM with brief introductions. The following is a sentimary of the (ppick discussed.

My Cynthia D. Simpson

Maryland National Copital Purk and Planning Commission Coordination Meeting.

Schedule/Status of Study

Sieve Plane gave a hitef overview of the study's appending activities, and distributed a sheet summarizing the study's major milesiones (see adsolved). The Orah Heviconmental Impact Statement is expected to be completed in Spring 2002, and a Location/Design Public Bearing is also enticipated in Spring 2002. The SHA expensives select a Professed Alternate in Spring 2003. Execution/Design approvals are expected an Summer/Pall 2003

Park Boundary Confirmation

Steve Plano presented the 1-200 alternates mapping and asked M-NCPPC to confirm the Blank Hall Regional Park boundary as presented on the mapping for accuracy

MINOPPO noted that the couthernmost area on the cast side of 1-270 shown on the allegators. mapping as part of Black Bill Regional Park is currently privately owned land. The area is designated to be part of the future Clarksburg Governway, and M-NCPPC asked that at rentain Jaboled as park groperty on the alternates mapping. MINCPPC asked that consideration be given to providing larger extensions to the polyert in the southern portion of the park such that they may be able to provide a few consenting the east and west sides of the park thirting dry conditions. Steve Plant asked that M-NCPPC provide the slody team with a copy of their master plan for Black Hill Regional Park. M-NCPPC provided an overview of their development plans. and corrounding development that they are aware of to the airdy team. M-NCPPC is planning a maintenance facility on the west side of \$4370 in a clearing over 1,000 ferr from the reinting linghway, as well as undergoing a study of an access road from Crystal Rock Drive as shown of the 1989 Germanown Master Plan M-NCPPC also noted the status of the Clarksburg Triangle residential development on the west with of 1-270 as being 10+ years and that the Crystal Rock pumping station is under construction on the west side of 1.270.

Aiternales Being Englanted

The 1-270 basid afternates include both highway and transit components. Within the area of the Black If it Regional Park boundary, the highway components propose easivening the existing southbound invole general purpose lane to an HOY lane and whiting two general purpose lanes to the outside in both the northbound and southbound directions. Appeaximately 900 feet north of the northern boundary of Black Hall Regional Park (West Old Haltimore Road), the I-220/US [5] Mislis-Model Chinder Study proposes a new interchange, 1-2700Newcut Road, as shown on the Clarkylving Master Plan. This new interchange will have direct access ramps from the medium carrying traffic directly from the HOV lands to the proposed Newcot Road) to serve the proposed transferoy's Control Station. Due to these affect access tumps, no widening to the inside one owner throughout the Black Hill Regional Park.

The transit components of the build Clemates propose either Light Rail Transit (CRT) or Bus Rapid Transit (DRT) on the CCT alignment. Within the Black Hill Regional Park vicinity, the transitively as proposed to run along this movifum of the Observation Drave (a proposed road-44) not part of the I 270/US 15 Molt. Media Committe Study). Sieve Plano staind that the master planned CCT alignment is a long-term planning study with a 20 to 25 year time feather far.

VII F 25



E. Minutes - Interagency Review & Coordination Meetings

Ms. Cynthia D. Simpson.

Maryland Nutional Capital Pack and Planning Commission Coordination Meeting, Page 3

construction and is based on a general master plan slody by Montgomery County; detailed in generating work still needs to be completed.

Potential Impacts

The study team distributed a sheet summarizing polyhetal right-of-way unputs Black Hill. Regional Park both with and without retaining walls.

Highwan Impects

The total prehiminary pre-avoidance (no retaining walls) highway import to Black Hill Regional Park is approximately 7.5 acres, based on a 25 foot buffer distance from the culfill little to the proposed eight of way line. If retaining walls were provided along the length of the park, this would minimize park eight of way impacts to approximately 4.2 Aires. These retaining walls which range in height from approximately 4 decision 17 fort high on the northhound side to approximately 20 feet high on the southbound side, and would very in vivibility from the road and from the park, depending upon the topography. The walls would generally be visible from the park. MINIPPO gave no indication in their preference for without walls over grading, but instead asked for time to review the areas within the proposed eight of way for large reces and animal hebitats.

Transitiva)

There are no transitively right of-way impacts to Black Hall Region 2 Park.

Day Johnson suggested a shafting the controlling of the highway to the east such that all widowing would occur to the east of the existing highway, therefore eliminating or at least reducing the impacts to the part property on the west side of 1-270. Karen Komm Mortis stated that due to the zoning of the Limibic one Farm on the west side of 1-270, they would prefer an equal balance of widoning on both sides of 3-270. McNOPPC noted that for regional-prefer an equal balance of widoning on both sides of 3-270. McNOPPC noted that for regional-park maps implications, they would acquire a 1-1 replacement of fault taken, and the replaced land should be contiguous to the park. McNOPPC asked that the earliest time at which SNA would begin to purchase land Study team members stated that the earliest time at which land could begin to be purchased as 5 years. McNOPPC asked whether acts were being studied in the Block HOI Regional Park. Study team intendeds explained that noise was being studied at sensitive locations in the 120AUS 15 entirities, however Black Hoil Regional Park was not one of the incations being studied. McNOPPC questioned how widening so the outside would affect the stirain on the west sign of 1-270. The study team replied that relocation of the stirain and well and replacement is poing studied.

Follow Co Hems

- M-NCPPC to confirm park houndaries and provide the inaster plan for Black Mill Regions?
 Park
- M-NCPPC to provide vegetation and habitat concerns to Anno Birays.
- RKWK/PR to commute evaluating the right-of-way impusit through the park based on the
 peopased highway and transitively abornates

Mc Cyralia D. Seupson

Maryland National Capital Park and Planning Commission Chordination Meeting Page 4

If you have any goostons, please contact Steve Plane, the project manager for SHA. By retephone at 410-545-8547, by email at plane@playerid com, or the environmental manager. Anne Elrays at 650-544-8562, by email of adjuga@class.ate.mc.us

Assertments

cc File (with attachments)
Attendees

1/11 F 1/

I-270/US 15 MULTI-MODAL CORRIDOR STUDY
A-D-105





Fairly N. Gerberney Colombia

Maryland Department of Natural Resources

Kashiwa Kumedy (washed Tanas State Office Budding to Greener SEP Taylor A count Amosphilis, Maryland 11401 J. Charles For. Jeography

Kana M. Wigie Grandenian

March 22, 2002

Ms. Aprie Eirays Project Planning Division State ILghway Administration P.O. Hot, 717 Baltimore, MD 21203

Re. Wadming of 2270, Orbana Lake FMA, (2002-DNR-032) Wildoning of 1-270, Seneca Creek, SP, (1996-DNR-030)

Dear Ms. Erraya.

Thank you for providing the requested mapping needed for our review of this project. The appendix of a currently being reviewed within DNR and we will provide you with any comments that much from that process. The information you requested in your January 29, 2002 letter is included below.

Urbana Lake From Management Area

Please field enclosed the requested map of the Litbana Lake PMA. The facility question 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 votume 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 secondance with input from DNR in such a way that they do not create negative imparts to the use of the tability, it will be possible to avoid compromising the famility's significance. No Program: Open Space or Land and Water Conservation foods were used for the acquisition of lisbana Lake FMA. However, Sport Fish Remoration money from the U.S. Department of the letterior is regularly used for management and maintenance activities for the Sacility.

Scriego Cheek State Park

Familians at Senera Cheek State Park provide a undo variety of day use opportunities, including hiking and nature study, bicycling and mountain biking, equestrian use, busing and fishing, pich kiking, playgrounds, due golf, haseball and mutil-use athletic fields. There have been no

OCAR TTY for the Dead; (476) 260 年度) Total freed: (472 Add (20代) Lirays Ann Much 37, 2002 Page 2

significant changes in the master planning goals or sile plans for the facility pince the information in our 1996 letter was provided. Although several particle of Sereca Creek State Park were acquired with Program Open Space and Land and Water Conservation funds, the restire park is currently considered "Ederatical" which eliminates the expression of tending requirements for individual parcels within the park, in cases where their uses are converted Resent use figures for Seriesa Creek SP have been requested and I will forward those to you when faceling ibour.

Clock forward to comprising to work with you as the project progresses. Feel free to call the all (410) 260-8410 if you need any further information.

Sincerely,

Amber Widmayer

Associate Planeas for the Control Region

VII-A-81





Apr. 5, 2002

Cynthia D. Simpton. Deputy Director Office of Planning and Pre-minary Engineering Maryland Department of Transportation Bat.-ere, MD 21203-0717

Dear Ms. 80трарті

Please find attached comments from the Park Planning and Resource Analysis unit on The wideling of 1-270 and Confider Class Transitivity implementation evaluated in the 1-273-US15 Mula-Model Corneo Study and the anticipated imparts to Modlebrook Hu Neighborhood Conservation Area, black -till Regional Park, North Companioner Grandway and Long Bernatt Regional Park in Vonlgomory County. This care response to your elling of privary 29, 2002 and your request, which was clarified in our moving at the toxic ica Stressiver on it, not level trust that we responded accordingly.

Summary of Representations

Further to our remain of the October 19, 2001 version of the Unit: Environmental Purchase to our remain of the October 19, 2001 version of the Unit Environment to the officered mount Statement (DE.S), we have identified primary and secondary impacts to the affected partients. We have also begun ferrifying mulgation measurer, that the Wirlyand State highway Administration (SHA) and the Mary'and Franch Administration (MTA) might conduct in preparing the Final Environmental Impact Statement. These measures include replacement papaland, no se mégalion, afream stablization, stormwater management, wellands in ligation, referestation, and safe trac crossings of the 1,270 markway

This Chit be leves that the 1-270 project presents the apportunity to lived a Countywide Park Trails Plan objective for onfe excessings of the 1974 readway. This might be stone at the Ten Mile Creek crosking test south of Compa Read as yet as in other toget and shown on the affaction Countywise Perk Trains Plant, approved by the Planting Board in 1995. Count detailed might who be given to immoving the executing 1-270 crossing at Seneral Crossing. make a display gradu pagistraled crosping sublibbe for thising and equiest An user in this logged SPA and MCA shall a coordinate the 1.270 constituted Seneral Craux State Park, 45 Well as coverted that crossings in other areas, with appropriate State Pers, and Managamery County Department of Park and Purroing staff, respectively

www.compgocoegg

We have forward to reviewing the signed of ten in the DEIS when the available. We caped that these or similar modulion measures will be incorporated in the Planning Board. comments on the Orlis one summer. In the morim please treathee to contact Michael Zamore at 301-050-4362 if you have any quasi and regarding this mineral

Sincerely.

Class, County Wide Numbing Division

JOHNEY STATEMENT OF THE CO. APACOMent.

> John E. Herich Rick Phydrone Dan & Mardy Rob Globs дуп (Эржилл um Screbson Gordon Ruserthal Jamie Chretienson Jim McMabani Wesdy Hosley

G/DATAMENT AND AND AND

VII -A-18



ATTACKMENT 1

PROPOSED WIDENING OF 1-276 AND ANTICIPATED IMPACTS TO MIDDLEBROOK HILL NEIGHBORMOOD CONSERVATION AREA BLACK HILL REGIONAL PARK, NORTH GERMANTOWN GREENWAY AND LITTLE BENNETT REGIONAL PARK

1 MODOLEBROOK HILL HILIGHBORHOOD CONSERVATION AREA

Primary and Secondary Functions:

The handlebrook hill Neighborhood Conservation June combibates to the green speck of Monigomery County and serves the functions of reduction, stream probability, and writing Hazital. The sourcester manages and pond for nearby box and on High Point Dime and Inturgry Lane. I learned on the foci by. Them is a methodeteenin tenting (Backets family), correctly observed on the northwin part of the area, and forester knowledge of the Nutrie American probability should overflowing the many greater at the northwin and southern corners of the property might be Nutrie American unchaecogical dides.

The southwin naw of the sile contains a high quality exted one forest. White cas (Guerous etcs), chestriut sub (Querous encus) and telip-pooler (Linedmenter) telipidical) are this misst common species with dominant trees ranging from to to 3.1 factives in a ameliar of broadship give (doh). Other tree species noted included real matrix (Acres in a ameliar of broadship better the past past (Guerous rubid), and black diagrap (Promiss personal). But to its promisity of Senetia Creek State Pieck, to location and the high quality levest that a contains, the area plays a particularly expiritually rate increasing with increasing we increasing each of the reservoir of the contains.

Autoputed Inigacts to Middlobrook Hill Neighborhood Conservation Area

The widening of 1,270 hs proposed, will have the following environments, and other miguets.

Primary Impacts

- they of approximately 2 makes of mixed narrowood forest that might include some of the argues some on the sile.
- 2. Introgram mass or pact (following narrhward relocation of the estating noise ways).
- Quartery and quoity imposes to the tributary and population scop of Seneca Greek (1919) the rightny extern edge of the site (shown on the apached (#22)).
- 4. Reduction in available apade for outdoor reproation (particularly by religh companiabilities).

Secondary Impacts

 Eros on impact to cans of the view out previously exposed to stormwelet engages from the 1,270 readway.

- Quality and quantity impacts to a small spring near the 1970 load right of way (R.O.W), proved on attached map).
- 3. Increased white-talled user conflict/impact with replantic of the area

Recommendations

- Lands taken from (N.64 nations toll recigitost food Conservation Area should be replaced with equivalent acreage of equivalent natural value, preferably at or near the Len Mile Crook crossing of the N.775 regardly ShiA and MFA should cook hate with the tigoriary County Department at Plant, Area Hanning shalf to determine how Deal to use the opportunity previously by the N.270 project to fulfill a CountyWide Park Trails Plantobaction for spile, grade-regardled trail crossings of the N.270 stationary.
- in the event that the road widening project develops as planned. It is recommended that SHA should consider the following a to improvements for Auditorbook H 1 Neighborhook Consensation Area.
 - Resains to, and landscaping of the storniwaler transferrent (SWM) pond and callet rear tigh Point Dave
 - Construction of a triage over the creek of the rath wastern edge of the property to facultate agrees to Mediatriack Ht. Neighborhood Connectation Area and Sensitive Crock, State Park, for Abbotsford Circle and Pronvers Onve/filigh Forn). Other residents.
 - Exploratory, archeological publical work to determine whether the two foliested shorts great daying the critick are Native American archeological vibra.
 - 2. BLACK HILL REGIONAL PARK AND NORTH GERMANTOWN GREENWAY

Observations

1. The portion of Black Mill Hegian's Plank on the western side of Interstate 270 utinals a religiously tugh quit by mustal ask fotest. Chestout tack white call, suctified cak are the most common ank appeads with dominant trees ranging from 16 to 28 inches in demolor. Other tree species notice includes not make, buck shetry. American beeth (Fagus grandfoss), hickory (Carya glature and C tomentodo), and turp poplar. Understaty trees and shrubs noted include dogwood (Carrier flands), mountain laure. (Kalmis Indials), high-cush bluebetry (Vacchium coryenbosum), kneepish bluebetry (Vacchium vacchias), and Arrenda onestrut (Castania dentate).

A preimmary legarding of large trees on the road R O/W three-hig services specificants and been. These included 25°, 28° and 20° numbers of breast higher food red case, a 20°, a 21°, and a 21°0° above the case, two 25°, a 24°, and a 21°0° above the case, two 25°, a 24°, a 30° ask for a separation of a 25°0° above the perfect to not only.

the forest is neutrally been at non-nature (missive species and, doop to the domous AGPS of deed browner, there is good regeneration of handworld species, dispecially they're! Oak,

Z

VII-A-19



A-D-109

A. Agency Correspondence

In the understory. The forest floor is covered with limit and woody file? These are many terms of different species including denarron fero (Oserboda prinagramas), Christmas fero (Potystichum perustichoides), radiovake ferr (Botystichum virginianum), interrupted fero (Osmunda strycthia), tady ferr (Athyrium blix termina), ebony spicerwich (Asplemum phyricutron), maldenna? ferr (Advantum penatum), and hay-trianted form (Dennylandha purchibbula).

There is one mea of palinstrine wedgeds towards the main stem of Little Seneca Creek, one area of wedness within the load RiO W immediately south of West Cid Batterior Road, and sovers) well communities of skunk cabbage (Symplocarpus fooddas) and godwicktherpulp (Sameema Imphythum), throughout the length of the RiC W between West (I'd Batteriore Road and Tittle Seneca Creek (see attached man).

if the area were to be assessed as to phoney for a Horest Stand Durincation study, it would be rated a 111 – Migh Priority

- 7 There is evidence of nearly eroxion from drainage pipes and past erosion control work along approximating 450 feet of the R-Q-W (Area 18) on analyted map) on Black Hill Regional Park. This has resulted in some localized movement of undersided or portly propeding up providers, severe flooding and oil deposition towards the main stem of unite Skineto Creak (Area 18) on attached map), and further modification of the stroom channel Some size modality has also occurred in that area. Erosion control work needs to be inspetted in these areas.
- The proposor transitively between Observation Drive and Newcol Road (proposes) on the
 eastern side of 1-270 bitteds the North Cermantown Greenway (through easting R. D.W)
 and prospic wetanos and airthurary of the Senecu Creek
- There will be welfands impact at North Germanister. Grondway 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

wiscoung of both easiers and wekners sizes of interstate 270 (botwood West Old Selt more Road and Little Seneca Crook) will result in the following

Primary Impacis

- 1 lines of a high quality stand of nardwood folest with significants sed frees and associated high veisity along the westor rose R-D VV
- 2 Loss of pelosythe wedands and wettend buffers at Black Aut Regional Park and North Gennyrhown Greenway.
- 3 The loss of approximately 2 vicins from North Germantown Greenway and an ostimated 17 acres from Black Hill Regions, Park. (Widening on the eastern side only will result in the tops of 2-3 scres from North Germantown Graenway and approximately 7 acres from Black Hill Regional Park.)

4. Westward re-ecation of the small inbutary of Little Strieds Creek (at the point IC) on the attached resp). Given the existing skepts, (a coation will have high east and righ impact.

 The loss of an informal (rg1.c Black Hu) Regional Park immodiately west of I-270, near Old Batteriore Road.

Cumulative Impacts

Hook up of the Regional Park seven (he to the new WSSC seventine will result in forest less. Earth movement during the pipe laying deerstion will lead triffle by to same erosion and situation of Little Sential Check that will persist until the situation stabilizes.

Secondary/Cumulative impacts:

- There is potential for groundwater loss (along the grave) bed of the proposed WSSC selver system) and subsequent impact on Little Seneral Creek
- The project is likely to cause further introduction and spikelying of con-native invusive clarity into Black Hill Regional Park
- The combination of wastward widening of inferenting 270 and construction of the processed senser time (in WASC's Crystal Rook Pumping Station) will magnify the copact of forest fragmentation on that part of Black Mt. Regional Park
- Increased storm water from road widening will impact hegatively on first and magnetive-sectates in Little Service (Prock (Impact is always gleatest if storm water management factors as are not properly \$100).
- 5. Ferest intenor dwelfing birds (FIDRs), emphibians, repairs and small (nammals, withingrate washnard away from new forest eage created by the road widening operations FIDRs in particular, might become more suppopilitie to rest predation by species such as reactions and foliast and to rest parasitism by bithwis-headed cow-birds. These predatory species are commonly found along forest edges.

Recomme<u>ndations</u>

- 1 Loss of lands from Stack Hip Regional Park and North Germantown Greenway should be replaced with equivalent acreage of equivalent refund value, protocobly at or near the first kills. Creek creating of the "27D readway SHA and MTA should coordinate with Montgomery County Ceparathent of Park and Planning staff to determine how best to use the experiency gressiated by the 1-27D ground to fulfill a Countywide Park Trans Planting grave for cafe, gradeway apparated tim i crossings of the 1-27D relevaly.
- 2. Seesign 4(8) of the U.S. DOT Act should apply for the area.
- 3 Consideration should be given to having the entire load widening operation confined to the eastern and left interaction 270, between the main arem of Little Senece Creek and West Old Bartimore Most (Acco "O" on anathed map). Among other things this option We.
 - (iiii) at impact of read donatruction to the less sensitive quaternized R-OAV.

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I-270/US 15 MULTI-MODAL CORRIDOR STUDY



- 5 Siminate the need for relocating the tributing of Sittle Senecal Creek that flows paralleling, and just west of interstate 270.
- Respiring the loss of fewer acres of forest and.
- d. Ensure that more is no loss of waterns on the western side of 1-270.
- 4 For every from it above, part of the Lintistron property around ately eart of Interactio 275 should be purchased for road Richey. The property should be purchased now white out styll undeveloped, and irrelately in expensive. This purchase would accommodate construction slogging areas for the Interaction 270 project.
- 5 In the event that a decition is taken to wiser both eastern and wastern access of felerstate 270 where it runs between Wingt Obi Balamore Road and Utile Seneca Creek. One.
 - A rejig thing with along the western road R-0.4V is preferable since if will, among aging things, rosult in the loss of fewer acres of forest.
 - All storm, water numerowers facilities should be located within the less sensitive costem road R-O-W;
 - c. The inbusiny of Little Senage Critics will need to be relocated westward. During this operation, care should be fatter to marrian the natural stream channel to the extent park sile. Enging a not recommended.

3. LITTLE GENNETT REGIONAL PARK

Observations

Intel Bernett Regental Park is an imparant component of the stream valley global convecting the Monopasty River watershed in Friedrick County to newby Damascus Representations Park and the Magnight Branch Street Valley Park. There are no facilities in the part of Lidie Bennett Regional Park that will be adjusted by watering of 1-270. The latek consists of moted narowand forest deminated by systems (Philanus occidentals). American specify white pak, rad dak and bilip-poplar. There is an understory of degewood, red maple and northead, and a shrub layer of busberry and specifish. Some histolicia rose (Rose of MARCH) is present.

The entire area to be impacted by the proposed 1-270 widening is within the stream buffer of either 1, the Bennett Creek or its rubusary (Seper Branch). There is by denote of hoursy size and channeling from three 14 inch alous draining the 1-270 handway (shows as 1, 2 and 3 At the anaphed map), as well as sit enposition that the size inhalary of Unite Branch Creek. Frosion control work needs to be initiated in those private the Amelier of some prightney.

There are signs of very night white-tailed devil usage of the area. Also, there in 0 gas pipeline within the stream bulber on the northern side of the offscarry

Assicipated Impacts to Little Bennett Regional Park

wrighning of 1-270 and combward relocation of the readway will have the lollowing solution medial and other respects:

Primary Imposts

- boss of 1M waters of forest and street stream buffer impact.
- Possible map feation of part of the simplimisatory to Little Bennett Creek Sawing roughly parallel to the in270 roadway.
- 3 Spressing of adultio (fish and magnetive rietrates) in gible Bermott Croek and its inbutary by accelerated articada from 1-270 loadway storm water

Soundary Impacts

 Further introduction and appearing of non-native envasive plants into Little Bennett. Regrated Park

Recommendation*

- 1 Lands taken from Little Benneh Regional Mark should be replaced with equivalent beroage of equivalent indical value, preferably at or near the Ten Mile Greek crossling of the 1270 regionary. SetA and VTA should coordinate with Monopertery County Department of Park and Planning staff to determine now best to use the opportunity presented by the 1-276 project to faith, a Countywide Park Trails Plan objective for sofe, grade-separated trail crossings of the 1-276 receiver.
- 2 Due care should be taken during stream restoration work undertaken in Light Bernett. Regional Park given its designation as nontidal wat ands of special State concern (as listed in COMAR 28 73.06 01).

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United States Department of the Interior

NATIONAL PARK SERVICE

Antietam National Battlefield Monocacy National Battlefield P.O. Box 158 Sharpsburg, MD 21782-0158

November 6, 1996

Mr. Louis Ege Maryland Department of Transportation State Highway Administration P.O. Box 717 Baltimore, MD 21202

Mr. Ege,

At the request of Ms. Anne Ellray of your staff we are forwarding a variety of planning documents and general information concerning Monocacy National Battlefield. This information will hopefully assist you and your staff in the evaluation of potential alternatives and impacts of the I-270 Corridor Study.

As I am sure you are aware Interstate 270 passes directly through the center of the National Battlefield, and any of the alternatives identified in your planning work will impact this national historic area in a negative fashion. If we can provide additional information on the battlefield, or possibly a site visit using one of our Historians to provide additional information please feel free to contact me.

I have provided the following information as requested:

- a. Monocacy NB Segment/Lands Map
- b. Interpretive Plan for Monocacy NB
- c. Wayside Exhibit Plan-Monocacy NB
- d. 1976 General Management Plan (Outdated)
- e. Historic Battle Action Map (Copy)

We have recently completed a vegetation study of the areas north of Route 355 within the Battlefield, and have contracted this year for a study of the Areas south of Interstate 270(Worthington Farm/Brooks Hill). We hope for a report from this study by March or April 1997. This work is being conducted by the Maryland Department of Natural Resources- Natural Heritage Commission.

I hope this information is helpful in your work, if we may be of further assistance please feel free to contact me on 301-432-7648.

Sincerely

J.W. Howard Superintendent





Maryland Department of Transportation State Highway Administration

Partis N. Glendening Governor

Devid L. Winstead Secretary Parker F. Williams

March 17, 1998

Mr. John W. Howard United States Department of the Interior National Park Service P. O. Box 158 Sharpsburg MD 21782-0158

Dear Mr. Howard:

Thank you for your interest in the I-270/US 15 Multi-Modal Corridor Study and for sharing your concerns regarding the historical and archeological considerations. I want to assure you that the State Highway Administration (SHA) will be sensitive of the environmental surroundings, including historic sites, throughout the development of this study.

The purpose of the I-270/US 15 Multi-Modal Corridor Study, from the Shady Grove Metro Station to Biggs Ford Road, is to relieve congestion within the Corridor due to existing and projected growth. Since the I-270/US 15 Multi-Modal Corridor Study is currently in the preliminary planning stage and no single strategy could solve the transportation needs in the I-270/US 15 Corridor, the Study Team is considering combination elternates. These Combination Alternates A and B are in addition to a Baseline, or No-Build, Alternate and a potential stand alone transit option. Both Combination Alternates A and B include enhanced express/feeder bus services, additional park and ride lots, the extension of High Occupancy Vehicle (HOV) lanes, a light rail transitury or busway between Shady Grove and Metropolitan Grove (with an option to extend further north), additional general use lanes, the extension of the local or Collector/Distributor (C/D) lanes, new and/or improved interchanges and structures throughout the Corridor, and a new roadway alignment option in Urbana called Technology Boulevard.

The letter you received was mailed to all residents within 150 feet on both the east and west side of 1-270 and US 15. The purpose of that letter is to inform the property owners that the SHA and its staff will be in the 1-270/US 15 Corridor to collect environmental data. These environmental data include identification of wetlands, floodplains, and archeological sites, as well as any endangered plants or animals. The SHA will not need to enter everyone's property; only a select few will need to be investigated. At most, a few small soil samples will be taken, and the SHA and its staff will return the land to its original condition. This minimally invasive process will further aide in the development of the alternates. The SHA appreciates your reply and will be applying for a permit in the near future and will coordinate with the Monocacy Battlefield through Charlie Hall, the SHA's archeological representative. As per your request, SHA will give you 2 weeks notification prior to entry onto the Monocacy Battlefield.

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech 1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717 Street Address: 707 North Calvert Street • Baltimore, Maryland 21202 Mr. John W. Howard Page Two

As the study progresses to the more detailed planning stage, alternates and impacts will be examined to a greater level of detail. Information on the development of these alternates, including impacts, benefits, and costs, will be presented in an Environmental Document at a Public Hearing, tentatively scheduled for late in 1999.

Thank you again for your interest in the I-270/US 15 Multi-Modal Corridor Study. Please feel free to call me at (410) 545-8547 or toll-free in Maryland, at (800) 548-5026, or Suhair Alkhatib of the Mass Transit Administration at (410) 767-3751, if you should have any further questions or comments.

Very truly yours,

Louis H. Ege, Jr. Deputy Director Office of Planning and Preliminary Engineering

By

Michelle D. Hoffman C. Project Manager Project Planning Division

LHE:MDH:rt

(File) (with incoming) Mrs. Betty Geisbert Ms. Anne Elrays, SHA Mr. Charles Hall, SHA Mr. James L. Wyan, SHA

270 15

A. Agency Correspondence

To:

internet:Susan Trail@nps.gov

Date: Subject: 10/29/98 10:58am NPS Comments -Reply

Susan - Thank you for the comments.

Michelle

>>> Susan Trail <Susan_Trail@nps.gov> 10/23/98 09:19am >>> Michelle and Ann:

Thank you again for the opportunity to comment on the draft I-270/US 15 Multi-Modal Corridor Study. I would like to emphasize again the points that I raised the other day:

- Given that Monocacy National Battlefield is both a National Historic Landmark and a National Park, it should be given a higher level of Section 106 review, and should be put in a separate category from other sites listed on or eligible for the National Register.
- Given the fact that I-270 effectively bisects the park, our concerns extend beyond the limits of the ROW corridor to include visual and audio impacts. We are particularly concerned about any impacts widening would have upon the overall battlefield cultural landscape.
- 3. On page 15, Monocacy NB needs to be added to the list of cultural resources to be studied for potential Section 4(f) impacts.
- 4. For any archeological assessments conducted within the park, we would like the opportunity to review the scope of work before any contract is awarded. We have found that traditional archeological surveys are not effective for recovering materials associated with battles, and would like to see a metal-detector survey added. We can talk more about this later.
- 5. As we had expressed in our meeting with you several months ago, we continue to be concerned about the potential pressure that construction of Technology Blvd. in Urbana will have toward widening Rt. 355 through the park. We would like to see this addressed as a potential impact in the EIS when it is prepared.

I contacted the National Register office concerning a map showing the NHL boundaries for Monocacy. They were going to check and send it to me if they had one. The nomination was done a number of years ago, and there may not even be a map associated with it. For the time being, I would use the present NPS boundary to define the NHL boundary. I will let you know next week if there are any differences.

If you have any questions, please call me at (301) 432-7648. Thanks.

Susan Trail

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United States Department of the Interior

NATIONAL PARK SERVICE Antictom National Battlefield

Monocacy National Battlefield P.O. Box 158 Sharpsburg, MD 21782-0158

January 27, 1999

Ms. Gay Olsen
Project Planning Division
Maryland Dept. of Transportation
State Highway Administration
P.O. Box 717
Baltimore, MD 21203-0717

Dear Ms. Olsen:

We have completed our review of the map and justification for the Secondary and Cumulative Effects Analysis and have the following comments to offer:

- Monocacy National Battlefield is not shown on the SCEA Boundary Area map. It definitely should be included as a Park/Conservation Area and its exclusion is a serious oversight.
- In the written justification for the geographic boundaries, it is unclear to what extent Monocacy National Battlefield is included within this boundary. Although its inclusion is implied on the map, it should be stated in the document.
- 3. As written, the document is confusing and difficult to follow. Some areas appear to be included because of proposed development (i.e., the area of proposed growth in Urbana between ND 355 and I-270), while others seem to be included because no development is proposed (i.e., the area between I-270 and the Sugarloaf Mountain natural area). It would be helpful if justifications for inclusion/exclusion were clarified.

Finally, though not a part of the document review, it would be very helpful if all correspondence in the future was sent to Antietam National Battlefield, P.O. Box 158, Sharpshurg, MD, 21782, rather than to our regional office in Washington, D.C. We thank you for the opportunity to comment on this document, and would like to reiterate our continued interest in all environmental analyses pertaining to the I-270/U.S. 15 corridor project.

Sincerely,

John W. Howard Superintendent

Sum W. Trail

Susan W. Trail Assistant Superintendent





Maryland Department of Transportation State Highway Administration

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Parris N. Glendening

Parker F. Williams

Administrator

Governor John D. Porcari

February 12, 1999

Project No. FR192B11 I-270/US 15 Multimodal Project from the Shady Grove Metro Station to North of Biggs Ford Road Frederick and Montgomery Counties

Mr. John Howard National Park Service Antietam National Battlefield P.O. Box 158 Sharpsburg MD 21782

Dear Mr. Howard:

Thank you for your comments (see enclosure) regarding the map showing the preliminary Secondary and Cumulative Effects Analysis (SCEA) boundary and written justification for the time frame and geographic parameters to be used in the analysis for the I-270/US 15 Multimodal Project.

We have provided the following responses to your comments in the same order discussed in your letter:

- The purpose of the map is to review the location and extent of the SCEA boundary. Only
 parks whose boundaries were used to define the SCEA boundary area are shown on this map.
 The mapping in the Environmental Impact Statement will include the Monocacy National
 Battlefield as a Park/Conservation Area.
- The entire Monocacy National Battlefield is included within the SCEA boundary. This information will be illustrated and included in the environmental document.
- 3. The SCEA boundary extends east of I-270 to include proposed development located within the Urbana Planning Area between MD 355 and I-270. You are correct in noting that generally, the SCEA boundary was extended as much as six miles east/west of I-270 to include areas where the potential for future proposed development is expected based on current 20-year projections. The SCEA boundary does not include large conservation areas such as Sugarloaf Mountain Natural Area where the potential for development is limited.

My telephone number is .

Maryland Relay Service for Impaired Hearing or Speech 1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 - Baltimore, MD 21203-0717 Street Address: 767 North Calvert Street - Baltimore, Maryland 21202 Mr. John Howard I-270/US 15 Multimodal Project From the Shady Grove Metro Station to North of Biggs Ford Road Page 2

Should you have any questions, please feel free to call the Project Manager, Ms. Michelle Hoffman at 410-545-8547 or the Environmental Manager, Ms. Anne Elrays at 410-545-8562, or toll free in Maryland at (800) 548-5026.

Very truly yours,

Louis H. Ege, Jr. Deputy Director Office of Planning and Preliminary Engineering

Joseph R. Kressleh-Assistant Division Chief Project Planning Division

LHE:AE Enclosure

N.C.

Mr. Terry Clark, MDE

Mr. Ray Dintaman, DNR

Mr. Louis H. Ege, Jr.

Mr. Steve Elinsky, COE

Ms. Anne Elrays

Mr. Elder Ghigiarelli, MDE

Ms. Michelle D. Hoffman

Mr. William Hoffman, EPA

Mr. Joseph R. Kresslein

Mr. J. Rodney Little, MHT

Ms. Diane Rateliff, MTA

Mr. Robert Sanders

Ms. Pamela stephenson, FHWA

Mr. David Sutherland, USFWS

Ms. Bihui Xu, MOP





Maryland Department of Transportation State Highway Administration

Parris N. Glendening John D. Porcari Secretary

Parker F. Williams

April 17, 2002

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

Mr. J. W. Howard Superintendent US Department of the Interior National Park Service P.O. Box 158 Sharpsburg MD 21782-0158

Dear Mr. Howard:

Thank you for your letter of March 25, 2002 to Ms. Cynthia Simpson. The State Highway Administration (SHA) appreciates your thoughtful comments and suggestions for improving our Draft Environmental Impact Statement and Section 4(f) Evaluation (DEIS/4(f)) for the I-270/US 15 Multi-Modal Study, and facilitating our Section 106 consultation. We look forward to working with you in a meaningful manner to address your concerns and develop measures that will mitigate the impact of our widening of I-270 on the Monocacy Battlefield. National Historic Landmark.

SHA is currently refining our consideration of the range of types of additional effects that our project might have on the battlefield, and further assessing ways in which these may be addressed in a constructive manner. Toward that goal, we will be convening a meeting of our respective offices, the Federal Highway Administration, the Advisory Council on Historic Preservation, State Historic Preservation Office (SHPO) and other interested parties, to consider these effects and strategies with which they may be mitigated.

We are cognizant that the Monocracy National Battlefield properties form a significant cultural resource reflecting three centuries of occupation of a cohesive historic landscape, occupied by diverse groups that blended and interacted on the five farms that make up the Battlefield. Onto this rural landscape was overlaid the travails of the Civil War, played out over three successive summers in 1862, 1863 and climaxing with the battle that interrupted and stymied the Confederate march on the capital of the United States, thus saving Washington DC in 1864

> My telephone number is _ Maryland Relay Service for Impaired Hearing or Speech 1-800-735-2256 Statewide Yoll Free

Mailing Address: P.O. Box 717 - Baltimore, MD 21203-0717 Street Address: 707 North Calvert Street - Baltimore, Maryland 21202

Mr. J. W. Howard I-270/US 15 Multi-Modal Study Page Two

To allay your concerns, SHA is well aware that the Monocacy Battlefield National Historic Landmark is indeed a precious historic resource and a sublime cultural landscape. Because of its outstanding landscape values, comprising an easis inviting contemplation and true appreciation of the significance of the battle and the concomitant loss of life, it has immeasurable meaning for the American public. Certainly we do not debase the beauty of this grand sweep of land by thinking of it merely as empty "undeveloped" acres lacking existing or planned amenities. We are very respectful that its lack of "development," in the common meaning of the word, provides the outstanding integrity that enables people to associate with the events that occurred there and with the lifeways that were interrupted on that fateful day in July, 1864.

In response to your comments regarding archeological resources, we agree that 18FR30 (Monocacy National Battlefield) is a highly significant archeological resource. However, we do not believe the current project will alter the site's ability to provide important information in

SHA conducted Phase I Archeological Identification investigations within the Area of Potential Effects (APE) on the Monocacy National Battlefield property in 1999. No archeological resources were identified within the APE. Prior to the initiation of this work, Dr. Stephen Potter and Mr. Bob Sonderman of your staff were consulted in 1998 regarding the project's research design. We subsequently obtained a permit from the National Park Service (NPS) to conduct identification investigations in compliance with The Archeological Resources Protection Act (P.L. 96-95). Dr. Stephen Potter and Dr. Susan Trail reviewed the resulting technical report detailing the findings and recommendations of the survey that included the Monocacy National Battlefield (Attachment 1). Comments on the report by the NPS are provided as Attachment 2. Please note that Dr. Susan Trail commented that the fieldwork was adequate for the area in question, and followed provisions of the NPS permit. SHA believes appropriate consultation was conducted with your agency for this aspect of the project.

The extent of the project's APE within the Monocacy National Battlefield has not changed substantially since the Phase I Archeological Identification survey. Extremely minor changes in the proposed right of way are apparent in a few places, but we do not believe this affects the efficacy of our previous Section 106 Identification efforts. The minor nature of these changes are evident when Figure 23 of the attached report indicating the APE surveyed in 1999, is compared to alternates mapping provided in the January 14, 2002 version of the DEIS/4(f). As the APE has not changed sufficiently to warrant additional investigations, we believe the results remain valid. The project will have no impacts on archeological sites 18FR30 (Monocacy National Battlefield) or 18FR110. However, we acknowledge that there are deficiencies in the project's current documentation that are being addressed.

Mr. J. W. Howard I-270/US 15 Multi-Modal Study Page Three

The SHPO reviewed and concurred in the findings and recommendations of the Phase I archeological survey in a letter of November 5, 1999 (Attachment 3). We failed to adequately address SHPO comments regarding the Monocacy National Battlefield (18FR30) in the project's final report. As instructed by the SHPO, we are amending Table 2 of the final report (Attachment 1), to include 18FR30. In addition, we will revise the report's Summary and Recommendations chapter to clearly state the significance of 18FR30, and a recommendation for temporary fencing during construction to ensure avoidance of archeological deposits beyond the limits of the previously surveyed APE. The draft Memorandum of Agreement (MOA) will be revised to include 18FR30 in Stipulation VIII - Identified Archeological Resources, with provisions for monitoring and oversight of the design of the selected alternate by qualified personnel meeting qualifications set forth in 36 CFR 61, and temporary fencing during construction to ensure protection of archeological resources in areas beyond the previously surveyed APE.

We appreciate the information transmitted in your letter regarding the ongoing archeological identification and evaluation efforts by the NPS at the Best Farm. The documentation provided on your investigations indicates that Confederate artillery was recorded by Hotchkiss (1864) in the vicinity of the APE. Although your scaling of the map appears extremely precise, it is difficult to determine the exactness with which Hotchkiss implemented its placement on the original map. As is evident from Figure 4 in the attached report, the project's research design did consider this feature's proximity to the APE. Shovel testing and metal detector swipes were conducted within the APE in that area as Transect E. No artifacts or features were identified. Given the results of our prior survey, we do not believe the project will impact the Confederate artillery placement indicated by Hotchkiss' (1864) map.

Testing was also implemented during our Phase I archeological survey within the APE south of the CSX rail line where 18FR110 was previously recorded, and where recent surveys have identified resources associated with the Best Farm. Transect E extended over the area of 18FR110 and also the area recently identified by your staff south of Best Farm, within the APE. The 2001 field walkover conducted by NPS recovered diagnostic artifacts at densities ranging from 3 to 24 artifacts per acre. However, shovel testing and metal detector sweeps within this portion of the APE failed to recover any artifacts and no subsurface features were noted. Given this data, it is evident that the significant archeological deposits identified in the NPS walkover will be avoided by the undertaking as planned.

SHA looks forward to continued consultation with your office, and the resolution of cultural resources issues illuminated by your letter. Please feel free to contact Ms. Rita M. Suffness at 410-545-8561 (rsuffness@sha.state.md.ut) or Ms. Mary F. Barse at



Mr. J. W. Howard I-270/US 15 Multi-Modal Study Page Four

410-545-2883 (mbarse@sha.state.md.us) of our Cultural Resources staff with any questions or concerns.

Very truly yours,

Cynthia D. Simpson Deputy Director Office of Planning and Preliminary Engineering

by:

Donald H. Sparklin Assistant Division Chief Project Planning Division

Attachments (3)

Ms. Mary F. Barse, SHA-PPD

Mr. Terry Carlstrom, NPS

Ms. Anne Elrays SHA-PPD (w/Attachments)

Mr. Dan Johnson, FHWA (w/Attachments 1 through 3)

Mr. Don Klima, ACHP (w/Attachments 1 through 3)

Mr. J. Rodney Little, MD SHPO (w/Attachments 1 through 3)

Senator Barbara Mikulski, Hagerstown Office Senator Paul Sarbanes, Western Maryland Field Office

Mr. Neil J. Pedersen, SHA-OPPE

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Ms. Rita M. Suffness, SHA-PPD

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