



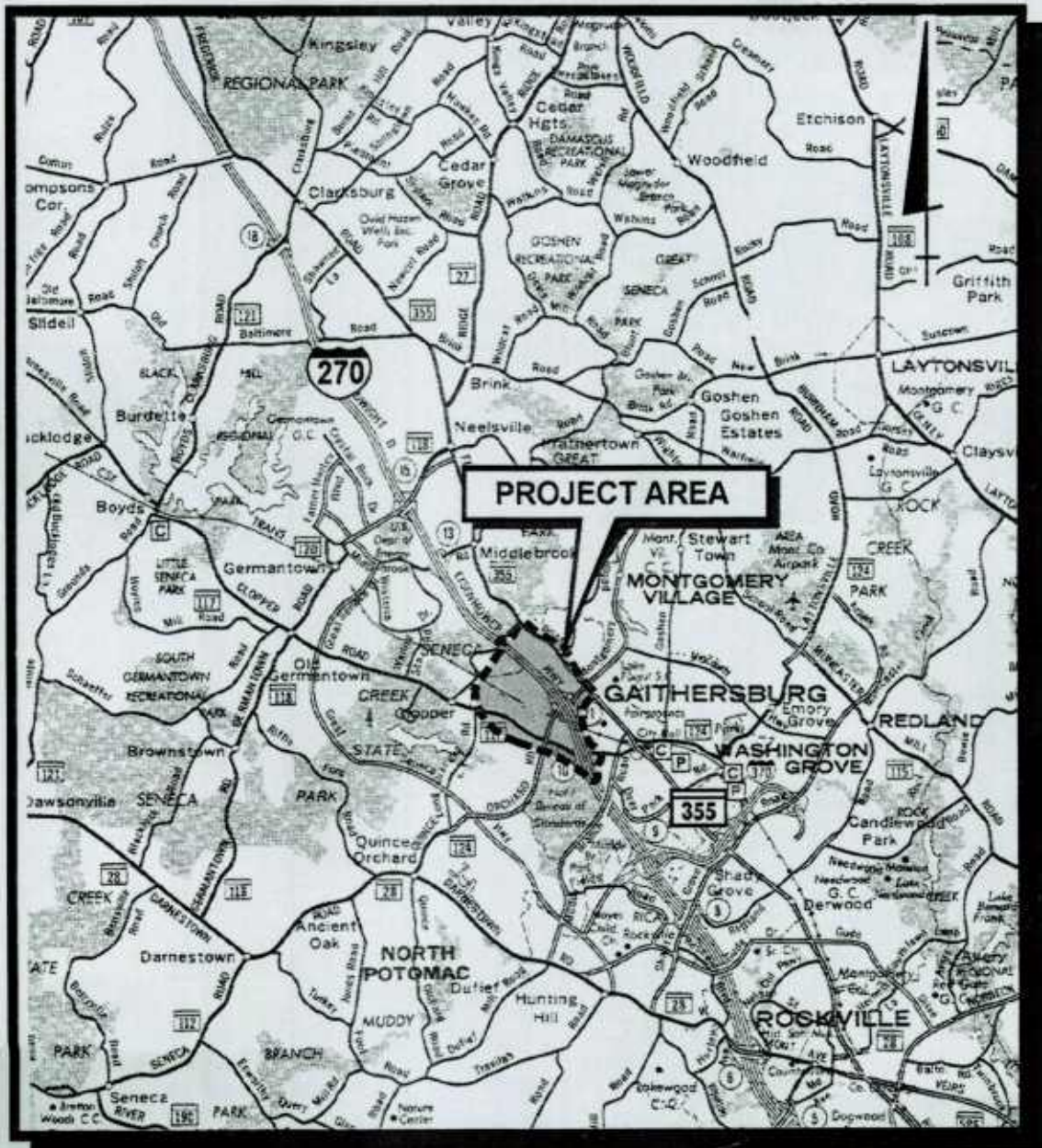
FINDING OF NO SIGNIFICANT IMPACT

Section 4(f) Evaluation

For Contract M0839B11

I-270 at Watkins Mill Road Extended

Montgomery County, Maryland



prepared by:

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION
STATE HIGHWAY ADMINISTRATION

FEDERAL HIGHWAY ADMINISTRATION
REGION III

FINDING OF NO SIGNIFICANT IMPACT
SECTION 4(f) EVALUATION

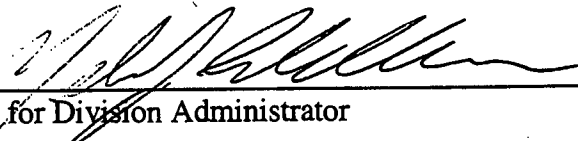
I-270 AT WATKINS MILL ROAD EXTENDED

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

and

STATE OF MARYLAND
DEPARTMENT OF TRANSPORTATION
STATE HIGHWAY ADMINISTRATION

The FHWA has determined that the Build Alternate 3 Revised, consisting of the construction of a new full diamond interchange north of MD 124 to provide access and mobility to I-270 at the proposed extension of Watkins Mill Road between MD 117 and MD 355, will have no significant impact upon the environment. The Selected Action is located in a serious ozone non-attainment area, but is not in a non-attainment area for carbon monoxide. The Selected Action conforms to the State Implementation Plan as it originates from a conforming Transportation Improvement Program and transportation plan. This FONSI/4(f) has been independently evaluated by the FHWA and determined to adequately and accurately discuss the need, environmental issues, and impacts of the proposed project and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an EIS is not required. The FHWA takes full responsibility for the accuracy, scope, and contents of the Environmental Assessment and attached documentation.


for Division Administrator

12/10/01
Date

I-270 AT WATKINS MILL ROAD EXTENDED

FINDING OF NO SIGNIFICANT IMPACT

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I. RECORD OF DECISION



**Maryland Department of Transportation
State Highway Administration**

10
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

MEMORANDUM

TO: Mr. Douglas H. Simmons
Director
Office of Planning and
Preliminary Engineering

FROM: Cynthia D. Simpson
Deputy Director *CD*
Office of Planning and
Preliminary Engineering

DATE:

SUBJECT: Project Number MO839B11
I-270/Watkins Mill Road Extended (WMRE) Study
Montgomery County

RE: April 3, 2001 Recommended Alternate Meeting With Administrator

The Project Team met with the SHA Administrator, Deputy Administrator for Planning and Engineering and the Director of the Office of Planning and Preliminary Engineering on Tuesday, April 3, 2001 to present the team's Recommended Alternate to the Administrator. The following people were in attendance:

Jeremy Beck	SHA – PPD	410-545-8518
Nelson Castellanos	FHWA	410-962-4440
Jean Chait	Montgomery County DPW&T	240-777-7197
Jon Chamberlin	SHA – District #3 ROW	301-513-7457
Joe Dement	The Wilson T. Ballard Co.	410-363-0150
Anne Elrays	SHA – PPD	410-545-8562
Dan Hardy	M-NCPPC	301-495-4530
Joe Harrison	SHA – PPD	410-545-8506
Kameel Holmes	SHA – PPD Travel Forecasting	410-545-5648
Dan Johnson	FHWA	410-962-4342 x145
Chris Kilgore	SHA – OED Landscape Architecture	410-560-2226
Joe Kresslein	SHA – PPD	410-545-8550
Mark Lotz	The Wilson T. Ballard Co.	410-363-0150
Ken McDonald	SHA – EAPD	410-545-5601

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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

Harvey Muller	SHA – RIPD Bicycle Coordinator	410-545-5656
Neil Pedersen	SHA – Deputy Administrator	410-545-0411
Nadia Pimentel	SHA – PPD	410-545-8533
Douglas Simmons	SHA – OPPE	410-545-0412
Cynthia D. Simpson	SHA – PPD	410-545-8500
Glen Smith	SHA – RIPD	410-545-5675
Esther Strawder	FHWA	410-962-4342 x134
Mona Sutton	SHA – PPD Travel Forecasting	410-545-5643
Lyn Waterhouse	SHA – RIPD	410-545-5675
Charlie Watkins	SHA – District #3 Engineer	301-513-7311
Parker F. Williams	SHA – Administrator	410-545-0400
Denise Winslow	FHWA – Maryland Division	410-962-4342 x116
Jim Wynn	SHA – PPD	410-545-8520

The meeting began at 10:00 AM with brief introductions. The following is a summary of the topics discussed.

Review of Purpose & Need and Alternates Presented at Public Hearing

Mark Lotz first briefly defined the project's purpose and need. The purpose of the project planning study at I-270 and Watkins Mill Road Extended is to provide improved access (vehicular, pedestrian, bicycle and transit) to and from the transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas (Priority Funding Areas) of northern Gaithersburg. In addition, it is important to improve access to the Metropolitan Grove MARC Station to facilitate increased transit use. Exhibits showing the extensive level of development planned both in and surrounding the study area were reviewed.

The alternates that were presented at the January 16, 2001 Location/Design Public Hearing were then described by Mark. He also distributed an environmental summary table that compares all of the alternates and options, which are as follows:

- Alternate 1 (No-Build) consists only of routine maintenance, minor construction projects and developer-based improvements associated with new developments.
- Alternate 2 (Partial Cloverleaf Interchange) consists of a diamond configuration on the east side of I-270 and a partial cloverleaf on the west side of I-270, with no ramps being constructed in the environmentally sensitive southwest quadrant of the interchange. Alternate 2A is the same as Alternate 2, but includes HOV direct access ramps.
- Alternate 3 (Full Diamond Interchange) consists of a diamond configuration, with braided ramps in the southwest quadrant of the interchange.
- Alternate 4 consists of a partial diamond configuration, allowing only movements from Watkins Mill Road to northbound I-270 and from southbound I-270 to Watkins Mill Road. Alternate 4A is the same as Alternate 4, but includes HOV direct access ramps.

- Alternate 6 (Watkins Mill Road Extended Without Interchange) consists of only the extension of Watkins Mill Road across I-270 with no interchange. Alternate 6A is the same as Alternate 6, but includes HOV direct access ramps.

Please note that all of the alternates presented at the Public Hearing, except Alternate 3, are compatible with southbound I-270 C-D lanes.

In addition, three Avoidance/Minimization Options were presented at the Public Hearing, to minimize impacts to Great Seneca Creek and Seneca Creek State Park:

- The Western C-D Shift Option consists of a full diamond interchange that includes a shift of the southbound I-270 C-D lanes 500-800 feet west of existing I-270.
- The Mainline Eastern Shift Option consists of a partial cloverleaf interchange that includes a shift of the entire I-270 mainline 45 feet to the east.
- The Northbound Braided Ramps Option consists of braided northbound ramps between MD 124 and Seneca Creek State Park.

Three Access Options, that could be considered in conjunction with any build alternate, were also presented at the Public Hearing:

- Access Option A consists of HOV direct access ramps from Watkins Mill Road to the median of I-270, separate from the general-purpose traffic.
- Access Option B consists of an extension of Metropolitan Court to Watkins Mill Road just west of the CSX tracks.
- Access Option C consists of an access ramp from MD 124 to the planned economic development on the east side of the CSX tracks and the transit stations.

Review of Public and Agency Coordination

Jeremy Beck next briefly described some of the recent community and agency coordination meetings that have occurred since the January 16, 2001 Public Hearing and handed out a summary sheet of accomplishments and issues resulting from those meetings. At the January 29 Gaithersburg City Council Work Session, the majority of residents that spoke were in favor of Alternates 1 and 6, and some developers were opposed to Access Option B because parking impacts to their properties may violate their lease agreements. At that meeting, the Mayor of Gaithersburg was neutral toward the interchange, but wanted more traffic information before making a recommendation. At the February 6 presentation to the Montgomery Village Foundation, the majority of Montgomery Village residents were strongly opposed to the construction of an interchange at Watkins Mill Road and felt that an interchange would accommodate large developments at the expense of local residents. At the March 1 Focus Group meeting, the developer of the Casey Tract suggested MD 355/Watkins Mill Road intersection improvements that would prevent traffic from crossing MD 355. Parker stated that he is not interested in preventing movements across MD 355 because it is not consistent with the project's purpose of increasing access to the interstate. In addition, the study team explained at that meeting that based on revised traffic projections, Watkins Mill Road traffic levels within Montgomery Village are not projected to be as high as at I-270. At the March 27 Montgomery Village Foundation meeting, the Montgomery Village representatives said that they want the

City of Gaithersburg to commit to traffic calming even before interchange construction takes place. At the February 12 Gaithersburg City Council worksession, the City Council had voted in a straw poll in favor of Alternate 3 Revised, and Mayor Katz unofficially endorsed Alternate 3 Revised. Eric Soter added that he has since drafted a resolution for the City of Gaithersburg in support of a full interchange, as well as traffic calming measures.

The results of recent agency coordination meetings were also presented by Jeremy. At the January 25 Army Corps of Engineer (ACOE) coordination meeting, ACOE stated that Alternate 2 as presented at the public hearing was significantly flawed because of stream impacts. At the February 8 meeting with FHWA, Mark had presented Alternate 3 Revised, which includes southbound painted I-270 C-D lanes in conjunction with retaining walls to minimize right-of-way and environmental impacts. Esther Strawder concurred at that meeting that the revised typical section and the 1,500 foot gore spacing are adequate and meet FHWA standards. At the ACOE and FHWA follow-up meeting on February 28, ACOE approved the geometrics and stream relocation concepts developed for Alternate 3 Revised, and felt that it was the most favorable full interchange alternate. FHWA also had concerns about the legal sufficiency for not selecting Alternate 4 or Alternate 6 based on their Section 4(f) avoidance and public support. Based on subsequent coordination with legal staff, FHWA thought they would be able to defend the selection of an alternate that has Section 4(f) impacts because avoidance alternates are not prudent and Section 4(f) impacts would likely occur anyway to the same resource area as a result of improvements constructed as part of the I-270/US 15 Multi-Modal Corridor Study. At the March 19 meeting with DNR, they unofficially stated that they would most likely not be interested in annexing the stream tributary corridor west of I-270 into Seneca Creek State Park because it is of poor quality and is not contiguous with the parkland. Parker asked if this project directly impacts Seneca Creek State Park, and Mark responded that the build alternates could avoid park impacts with retaining walls if no C-D lanes are constructed on I-270.

Review of Recent Key Issues

Mona Sutton presented the preliminary results of ongoing traffic studies and handed out to the group a summary sheet. The Travel Forecasting section is refining the no-build ADT projections and clarifying various data in response to citizen requests. The I-270/US 15 Study did not include these numbers because the extension of Watkins Mill Road is in the Constrained Long Range Plan. Also, additional traffic analysis is being performed at several locations along existing Watkins Mill Road in the Montgomery Village community. The study area has been expanded to address the concerns of these residents and obtain additional traffic information for possible traffic calming analysis. Traffic calming measures are under consideration by the City of Gaithersburg and Montgomery County DPW&T. Additional intersection analysis was performed at the interchange terminals on MD 124 and Watkins Mill Road to more directly identify the effects of the alternates at the I-270 interchanges. The study team is also coordinating the land use assumptions with both the City of Gaithersburg and Montgomery County.

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The land use within the study area was presented by Mark. He pointed out that the number of households northeast of the Montgomery Village community is expected to increase by 2020, which is primarily responsible for the projected increase in traffic on existing Watkins Mill Road within Montgomery Village. Although the most recent traffic forecasts show that the projected 2020 ADT level of 20,400 vehicles on Watkins Mill Road just east of MD 355, it drops to 12,800 vehicles at Seneca Creek. At the Public Hearing, many Montgomery Village residents had thought that the projected traffic levels on Watkins Mill Road at the interchange would remain constant over the road's entire length. Jean Chait stated that Montgomery County is in support of a full interchange at I-270 and Watkins Mill Road Extended, and is coordinating with the Montgomery Village Foundation regarding traffic calming measures within Montgomery Village. Neil feels that SHA will need a firm commitment from the City of Gaithersburg and Montgomery County regarding traffic calming measures on Watkins Mill Road and Pheasant Run Drive before Location/Design approvals. Parker asked if existing Watkins Mill Road is currently used as a cut-through route, and Mark answered that it is often used as a shortcut for drivers reaching Montgomery Village Avenue. Parker also asked where this project falls on the County's priority list, and Jean answered that it is a high priority project for the County.

Mark also discussed the proposed development activity in the project area. Development proposed near Watkins Mill Road Extended includes the IBM property redevelopment, the Casey Tract development, the Bennington Corporation redevelopment and the Metropolitan Grove Park redevelopment. Mark stated that the developers' intent is to develop their property even under no-build conditions. Mark added that the study team will need to be careful about coordinating with the Casey Tract developer because he may attempt to tie his access roads directly into the southbound I-270 off-ramp. Neil asked what portion of the right-of-way cost we should expect to have donated by developers. Mark responded that the developer of the Monument property would most likely dedicate some right-of-way. Neil asked why the team did not expect all of the right-of-way to be donated on the west side of I-270, and Mark explained that the developer does not yet have control of the entire property even though they assume eventual control. Neil added that SHA would need right-of-way donation from the property owners who most benefit from the project. Neil asked what percentage of interchange traffic would be headed to or from the proposed development, and Dan responded that the MWCOG models anticipate approximately 30-50% of interchange traffic being development oriented.

Presentation of Revised Build Alternates

Alternate 2 Revised and Alternate 3 Revised, the study team's two full interchange options, were explained by Mark. He handed out to the group an environmental and cost summary sheet that compares both alternates. Alternate 2 Revised includes painted southbound I-270 C-D lanes in conjunction with a western C-D shift. Alternate 3 Revised includes painted southbound I-270 C-D lanes, southbound retaining walls to minimize stream impacts, and a realigned ramp to minimize impacts to the Caulfield community. Parker asked what portion of the Watkins Mill Road extension would be constructed by SHA. Mark responded that developers would build the Watkins Mill Road extension, but not the bridge or interchange. Parker added that SHA might

consider having the developer construct the interchange ramps because they benefit most from the ramps.

A brief summary of the costs of the alternates was presented by Mark. The Wilson T. Ballard Company has developed cost estimates for various interchange staging scenarios. The cost estimates break out the cost of the extension, bridge and C-D lanes, all of which may be built by others or by SHA in other projects. Alternate 3 Revised has an estimated cost of \$59 million if the cost of the C-D lanes is broken out. Neil said that the revised cost estimate is more reasonable than the higher original cost estimate that included the long-term C-D lane construction. Denise Winslow asked if the interchange ramps were constructed as part of this project and the C-D lanes were constructed later as part of the I-270/US 15 Study, how much money would be wasted. Mark responded that approximately \$5 million would be wasted because of the need to reconstruct the ramps to make them compatible with C-D lanes.

Mark also discussed the possibility of staged construction, which would allow for the construction of a temporary partial interchange if a full interchange is too expensive to construct at one time. Denise said that FHWA still has concerns about staged construction because it would result in I-270 temporarily having four partial interchanges in a row. She asked how long it would take to complete the interchange if construction is completed in stages. Neil answered that the remaining ramps would be constructed as part of the I-270/US 15 Study, at least ten years from now, although no exact date has been set. Neil stated that the study team should continue the process of receiving NEPA approval of full build out, but should consider staged construction.

Parker asked how close the proposed Watkins Mill Road Extended interchange would be from the existing MD 124 interchange. Mark responded that the two interchanges were approximately 3500' apart, with 2000' of weaving distance. Parker asked if there are currently any weaving problems at existing interchanges that are so close together, and Mark said that the C-D lanes would improve the traffic flow at this area. Parker asked why the southbound Watkins Mill Road Extended ramps are braided, and Mark answered that it is to decrease right-of-way impacts and remove a weave area.

Draft SHA Recommended Alternate

The study team's rationale for preferring a full interchange concept at I-270 and Watkins Mill Road was explained by Mark. A full interchange is the only option that is consistent with the City of Gaithersburg master plan. A full interchange also provides the necessary traffic operational improvements that would decrease traffic volumes at the I-270/MD 124 and I-270/MD 117 interchanges. Mark then discussed the study team's recommendation of Alternate 3 Revised as the SHA Recommended Alternate. He handed out to the group a copy of the Draft Recommended Alternate package. Alternate 3 Revised is the study team's Recommended Alternate because it best provides the benefits of a full interchange and is compatible with future I-270 C-D lanes. This alternate limits wetland impacts to less than one acre and does not require the displacement of any residences within the Caulfield community on Game Preserve Road or

any business displacements. Both the City of Gaithersburg and the Montgomery County DPW&T endorse Alternate 3 Revised, provided that traffic and safety impacts to the local schools on Watkins Mill Road in the Montgomery Village community are addressed. Neil has requested that written documentation be obtained from FHWA confirming their previous verbal statement that there are no prudent and feasible means of achieving Section 4(f) avoidance.

A briefing was made to the Montgomery County Planning Board on April 26, 2001 that consisted of a staff recommendation to support the construction of a full-movement interchange on I-270 at Watkins Mill Road Extended with six associated comments. The briefing was delivered by Daniel Hardy of M-NCPPC's Transportation Planning, County-wide Planning Division, based on a briefing memo he wrote, dated April 20, 2001. Neil Pedersen and Mark also made brief presentations on behalf of SHA and answered various questions from Planning Board members. Public testimony was provided by two Montgomery Village residents opposed to the project or recommending postponement of the project until certain transit and county road improvements County are made. The Planning Board voted unanimously to support the recommendation for implementation of the full interchange with consideration of the citizen input. Parker had stated at the Administrator's Recommendation Meeting that he would wait to endorse an SHA recommended alternate until after the presentation to the Montgomery County Planning Board was made.

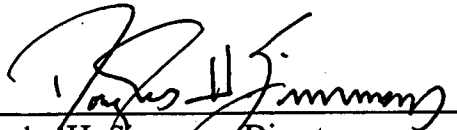
Follow-Up Items

Parker and the group then discussed the necessary follow-up activities that must be completed before the next meeting. Doug and Kirk will meet to discuss the preliminary engineering cost estimate. Neil said that the team needs to coordinate further discussion with the City of Gaithersburg and the developers regarding right-of-way donations before SHA could fund the project. Glen will check up on the status of this project's interstate access point approval. Dan will meet with the Montgomery Village Foundation to discuss land use.

Upcoming Schedule

The Interagency handout of the SHA Draft Selected Alternate is to be distributed on May 16, 2001, and the Interagency Presentation of the SHA Draft Selected Alternate will be on June 20, 2001. The next project newsletter will be distributed in Summer 2001. The FONSI submission to FHWA is expected in September 2001 and Location/Design approvals are anticipated in December 2001.

I concur that the above accurately represents direction provided by the Administrator at the April 3, 2001 Alternate Recommendation Meeting, where Alternate 3 Revised was presented as the recommended alternative at I-270 and Watkins Mill Road.



Douglas H. Simmons, Director
Office of Planning and Preliminary Engineering

5/17/01

Date

II. COMPARISON OF ALTERNATES

TABLE 1
SUMMARY OF IMPACTS
SELECTED ALTERNATE

Analysis Item	Alternate 1 (No Build)	Selected Alternate Alternate 3 Revised
<u>Socio-Economic Environment</u>		
1. Displacements		
a. Residential	0	0
b. Business/Commercial	0	0
TOTAL	0	0
2. No. of Properties & Resources Affected		
a. Residential	0	12
b. Business/Commercial	0	24
c. Parkland or Recreation Area	0	2*
d. Church/School	0	0
e. Historic/Archeological	0	0/0
TOTAL	0	38
3. Right of Way Required - Acres		
a. Residential	0	3.9
b. Business/Commercial	0	58.2
c. Parkland or Recreation Area	0	5.45
d. Church/School	0	0
e. Historic/Archeological	0	0/0
TOTAL	0	67.55
4. Consistent With Area Land Use Plans		Yes
<u>Natural Environment</u>		
1. Number of Stream Crossings	0	9
2. 100-Year Floodplain Affected (Acres)	0	6.4
3. Wetlands Affected (Acres)	0	0.76
4. Waters of the U.S. Affected - Other Than Wetlands (LF)	0	1730
5. Woodlands Affected (Acres)	0	30.9
6. Stream Relocations - LF	0	175
7. Affected Threatened or Endangered Species	0	0
8. Area of Prime Farmland Affected	0	0
Noise		
Number NSAs Exceeding Abatement Criteria or Increasing 10 dBA or More Over Ambient	0	2
Air Quality		
CO Violations of 1-Hour or 8-Hour Standards	0	0
COST (x \$1,000,000)	0	142.2

*The Selected Alternate would impact only one park, Seneca Creek State Park, which is traversed by I-270. The Selected Alternate would impact Seneca Creek State Park on both the east side and west side of I-270.

TABLE 2

SUMMARY OF IMPACTS

ALTERNATES PRESENTED AT THE LOCATION/DESIGN PUBLIC HEARING ON JANUARY 16, 2001

	ALTERNATE								EASTERN SHIFT	C-D WESTERN SHIFT	NORTHBOUND BRAIDED RAMP	ACCESS OPTION	
	NO-BUILD 1	2	2A	3	4	4A	6	6A				B	C
Socio-Economic Environment													
1. Displacements													
a. Residential	0	1	1	0	0	0	0	0	1	1	0	0	0
b. Business/Commercial	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	1	1	0	0	0	0	0	1	1	0	0	0
2. No. of Properties & Resources Affected													
a. Residential	0	8	8	8	8	8	7	7	8	8	8	0	5
b. Business/Commercial	0	31	31	26	22	23	14	22	31	31	26	4	5
c. Parkland or Recreation Area	0	3	3	2	0	1	0	1	3	3	0	0	0
d. Church/School	0	0	0	0	0	0	0	0	0	0	0	0	0
e. Historic/Archeological	0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
TOTAL	0	42	42	36	30	32	21	30	42	42	34	4	10
3. Right-of-Way Required - Acres													
a. Residential	0	16.3	16.3	15.5	15.6	15.6	0.4	0.4	16.3	7.7	15.5	0	1.8
b. Business/Commercial	0	45.5	49.7	49.2	31.8	37.7	25.8	32.6	46.0	74.4	48.5	2.9	11.3
c. Parkland or Recreation Area	0	6.3	6.3	4.0	0	0.8	0	0.8	6.3	6.3	0	0	0
d. Church/School	0	0	0	0	0	0	0	0	0	0	0	0	0
e. Historic/Archeological	0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
TOTAL	0	68.1	72.3	68.7	47.4	54.1	26.2	33.8	68.6	88.4¹	64.0	2.9	13.1
4. Consistent With Area Land Use Plans		YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES

TABLE 2

**SUMMARY OF IMPACTS
ALTERNATES PRESENTED AT THE LOCATION/DESIGN PUBLIC HEARING ON JANUARY 16, 2001**

(continued)

	ALTERNATE							MAINLINE EASTERN SHIFT	C-D WESTERN SHIFT	NORTHBOND BRAIDED RAMPS	ACCESS OPTION	
	NO- BUILD 1	2	2A	3	4	4A	6	6A			B	C
Natural Environment												
1. Number of Stream Crossings	0	10	10	9	7	7	3	5	10	8	0	0
2. 100-Year Floodplain Affected - Acres	0	7.84	7.87	6.44	0.90	2.10	0.40	1.60	6.22	6.30	0	0
3. Wetlands Affected - Acres	0	1.08	1.12	0.70	0.34	0.54	0.32	0.52	1.08	1.08	0	1.01
4. Water of the U.S. Affected - Other Than Wetlands - LF	0	2930	2940	3205	1455	1675	840	1060	2430	1870	0	0
5. Woodlands Affected - Acres	0	31.3	33.1	25.0	19.8	21.8	12.0	15.6	31.0	28.1	0.1	5.8
6. Stream Relocations - LF	0	1640	1640	1840	160	320	0	160	940	460	0	0
7. Affected Threatened or Endangered Species	0	0	0	0	0	0	0	0	0	0	0	0
8. Area of Prime Farmland Affected	0	0	0	0	0	0	0	0	0	0	0	0
Noise												
Number NSAs Exceeding Abatement Criteria or Increasing 10 dBA or More Over Ambient	0	2	2	2	2	2	2	2	2	2	0	0
Air Quality												
CO Violations of 1-Hour or 8-Hour Standards	0	0	0	0	0	0	0	0	0	0	0	0
Cost (x \$1,000,000)	0.0	111	141	94	49	78	34	66	117	142	3.8	9.0

¹C-D Western Shift includes right-of-way for more undevelopable land than any other alternate

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III. SUMMARY OF ACTIONS AND RECOMMENDATION

III. SUMMARY OF ACTIONS AND RECOMMENDATION

A. Background

1. Project Location

The I-270 at Watkins Mill Road Extended project area is located in the northern portion of the City of Gaithersburg in Montgomery County, Maryland. The project area encompasses the I-270 corridor, from south of Seneca Creek Park to the interchange of MD 124 (Quince Orchard Road/Montgomery Village Avenue)/MD 117 (Clopper Road); Watkins Mill Road, from MD 355 on the east to MD 117 on the west; and their environs (see Figures 1 and 2). Existing Watkins Mill Road is a discontinuous collector road, which extends east from MD 355 (0.6 mile north of MD 124) for approximately 2.7 miles, 500 feet of which are within the project area. It also includes a 1,200-foot long segment, known as West Watkins Mill Road, that extends east from MD 117 (0.75 mile north of MD 124) and dead ends just west of the CSX rail lines. The resulting gap in Watkins Mill Road is approximately 1.0 mile long, across I-270.

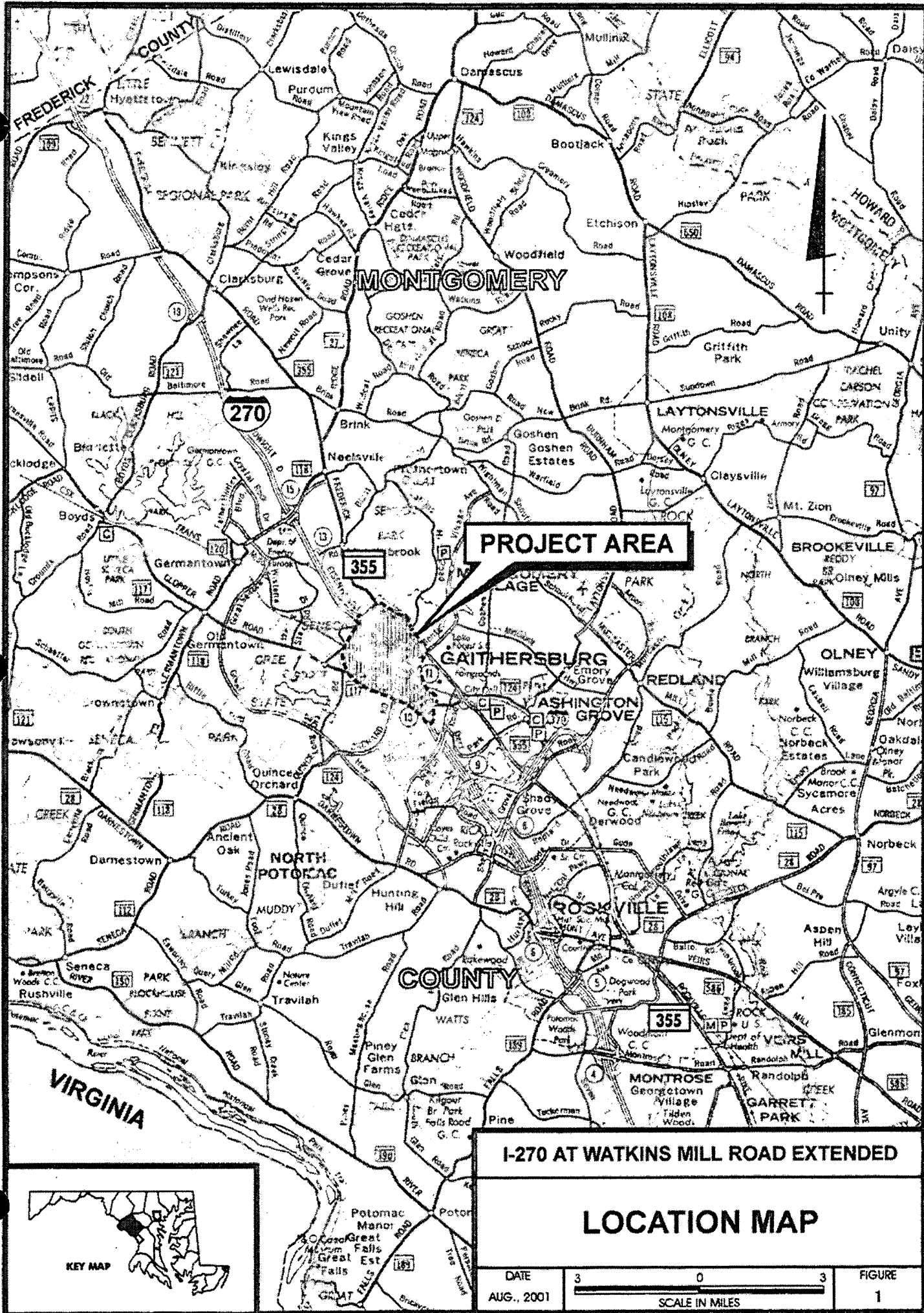
The entire project area is located within Montgomery County's priority funding area (PFA). PFA's are existing communities and other areas designated for growth by local jurisdictions in accordance with the criteria outlined in the Smart Growth legislation. The Smart Growth Areas Act was enacted in October, 1997 with the intent to direct state funding for growth-related projects to areas designated as PFA's. The Smart Growth Areas Act directs development to existing towns, neighborhoods and business areas by directing state infrastructure improvements to those places.

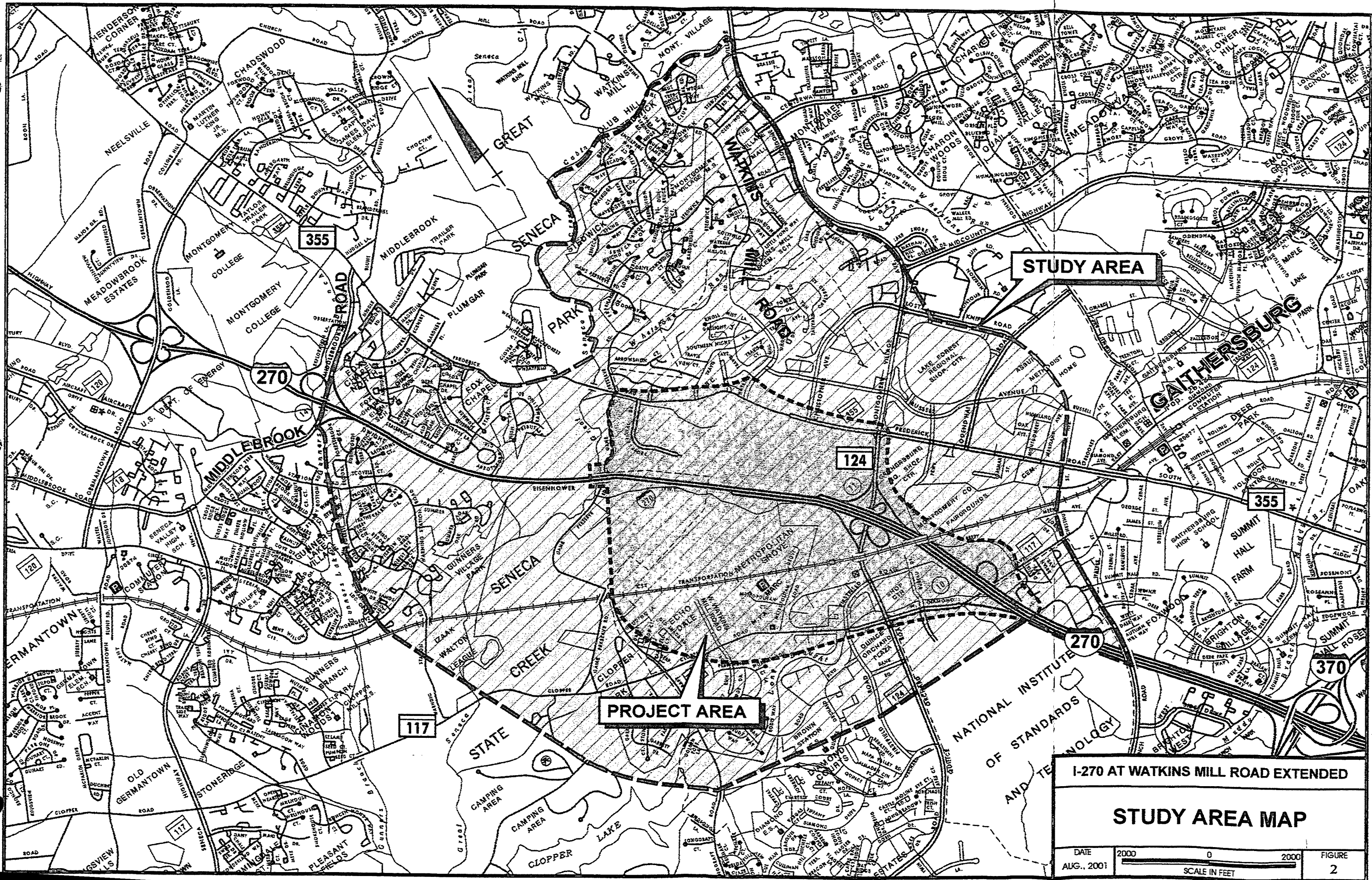
Existing Watkins Mill Road is functionally classified as a collector road, MD 124 is functionally classified as another principal arterial, and I-270 is functionally classified as an interstate highway and is part of the National Highway System. In addition, MD 355 is functionally classified as an other principal arterial and MD 117 is classified as a minor arterial.

The existing typical section on I-270 in the study area is eight lanes with a 30-foot median and 10-foot outside shoulders. The inside northbound lane operates as a high occupancy vehicle (HOV) lane during the evening rush hour.

2. Purpose and Need for the Project

The purpose of the I-270 at Watkins Mill Road Extended project is to provide improved access (vehicular, pedestrian, bicycle and transit) to and from the transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas (Priority Funding Areas) of northern Gaithersburg. In addition, it is





STUDY AREA

PROJECT AREA

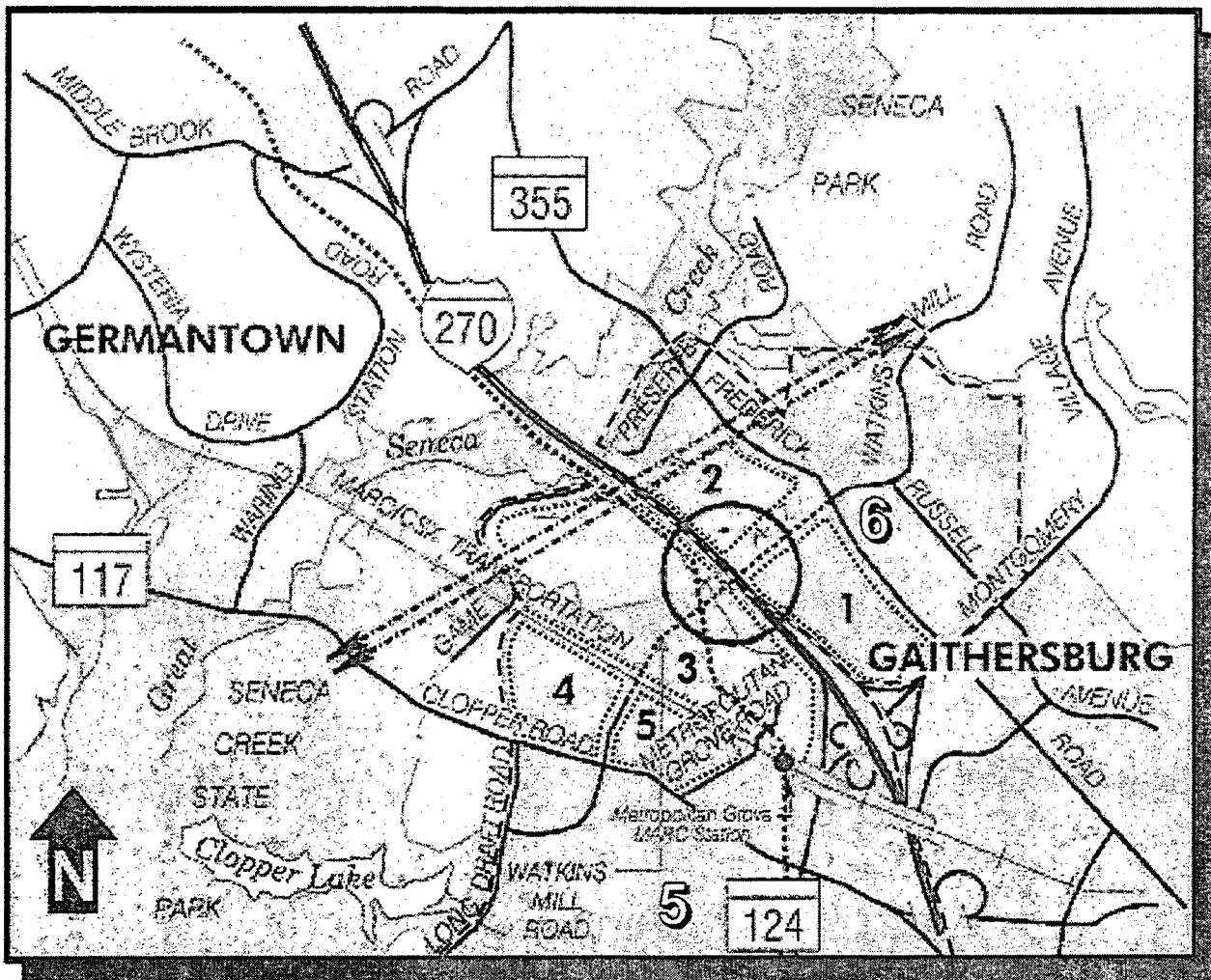
I-270 AT WATKINS MILL ROAD EXTENDED			
STUDY AREA MAP			
DATE AUG., 2001	2000 0 2000 SCALE IN FEET		FIGURE 2

important to improve access to the Metropolitan Grove MARC Station to facilitate increased transit use (see Figure 3).

As indicated in a previous feasibility study prepared by the City of Gaithersburg and Montgomery County, improved access in northern Gaithersburg to I-270, such as from proposed Watkins Mill Road extended, would provide several benefits. The City of Gaithersburg and Montgomery County have made this project a priority in order to accommodate critical office and commercial development for northern Gaithersburg. Representatives of the City of Gaithersburg have indicated that several development plans have been on hold for over two years pending this project. Prior to the initiation of this study, the city and the county jointly conducted a feasibility study of an interchange of Watkins Mill Road Extended with I-270. The city and county recommended a partial cloverleaf interchange with I-270 and Watkins Mill Road extended as part of their feasibility study, completed in August of 1998.

The need for this project is to provide a sufficient level of access and mobility to support economic development efforts in designated growth areas of northern Gaithersburg, as identified in the 1997 adopted City of Gaithersburg Master Plan. The City of Gaithersburg has designated several parcels in northern Gaithersburg for economic development, where both employment growth and residential growth are planned to occur. These planned developments would accommodate 2.3 million square feet of new office/research space development and 2.3 million square feet of office/research space re-development within northern Gaithersburg, located within the designated City of Gaithersburg municipality. Several of these developments are awaiting additional determination on master plan alignments of transportation infrastructure. Full build out of this area is not possible without the additional transportation infrastructure. However, accessibility and mobility will need to be addressed for 94% of the office/research development and 57% of the residential development, which is being approved assuming the master plan infrastructure.

The planned economic development in northern Gaithersburg (see Figure 3) projects or anticipates 2.3 million square feet of new office/research development space with 1,500 residential units and 2.3 million square feet of re-developed office/research space. It is noted that the square footage caps set forth by the land use plans are target numbers, which means that the 4.6 million square feet of economic development should be viewed as the ultimate development potential for this area. Furthermore, since the development potential in this area is based on approved Master Plans for these planning sectors, the development assumes that the master planned infrastructure will occur. Based on this ultimate development potential, the 4.6 million square feet of economic development would equate to approximately 73,051 new trips, the majority of which will occur regardless of the I-270 project at Watkins Mill Road Extended. The



- Study Area
- City of Gaithersburg Boundary
- Parks
- PEPCO Power Lines
- City of Gaithersburg Master Plan Watkins Mill Road Extended
- City of Gaithersburg Master Plan I-270/Watkins Mill Road Extended Interchange
- Montgomery County Master Plan Corridor Cities Transitway (CCT) Alignment
- Master Plan - Designated Neighborhoods

Planned Study Area Development

- 1 IBM (and Lockheed-Martin) Property (re-development)
1.1 million s.f. office/research space
- 2 Casey Tract East (undeveloped)
600,000 s.f. office/research space
- 3 Casey Tract West (undeveloped)
1.7 million s.f. office/research space + 1,500 residential units
- 4 Bennington Corporation (re-development)
800,000 s.f. office/research space
- 5 Metropolitan Grove Park (re-development)
400,000 s.f. office/research space

I-270 AT WATKINS MILL ROAD EXTENDED

PLANNED STUDY AREA DEVELOPMENT

DATE
AUG., 2001

3000± 0 3000±
SCALE IN FEET

FIGURE
3

majority of future development within the study area does not depend on any specific infrastructure improvements; however, based on traffic and access in the area, the City of Gaithersburg and Montgomery County have deemed infrastructure improvements important to handle existing, as well as this approved and pending development. The City of Gaithersburg has developed considerable detail concerning the amount of development that can occur in the study area for various levels of roadway improvement.

The City of Gaithersburg has subdivided Gaithersburg into six neighborhoods for planning purposes. Neighborhoods 5 and 6 (see Figure 3), in the northern portion of the city, comprise most of this project's study area and have been slated in the Master Plan as areas for economic development. The Master Plan goal in these neighborhoods is to provide transit accessible, pedestrian-friendly town centers with access to other employment and residential areas. The City of Gaithersburg views these neighborhoods as having the greatest potential for a mixed-use development of high quality. The undeveloped land on both sides of I-270 are the last large parcels within the Gaithersburg's Priority Funding Area. This land could support the emergence of a dynamic development due to the presence of the road network, the MARC rail station and the future light rail or busway stop.

The IBM (and Lockheed Martin) site is planned for 1.1 million square feet of office/research space (re-development) along with the following new development: 440,000 square feet of retail space; an 80,000 square foot theater complex with 4,000 to 4,500 seats; and a hotel with 250 to 350 rooms. The Casey Tract is planned for 2.3 million square feet of new office/research space and 1,500 to 2,000 residential dwelling units. Additional re-development is also planned for several sites along MD 117 and MD 355 (Bennington Corporation at 800,000 square feet and Metropolitan Grove Park at 400,000 square feet), as shown on Figure 3. The jobs projected for this area would serve to assist in balancing the housing and jobs within the City of Gaithersburg and along the I-270 Corridor. Table 3 shows the projected employment and residential populations for this area.

TABLE 3
PLANNED DEVELOPMENT

	Potential Space	Projected Jobs	New Population
<u>Re-Development</u>			
IBM/Lockheed Martin	1.1 M SF office/research	628	NA
Bennington Corporation	800,000 SF office/research	2,460	NA
Metropolitan Grove Park	400,000 SF office/research	1,142	NA
<u>New Development</u>			
Casey Tract East	600,000 SF office/research	2,400	NA
Casey Tract West	1.7 M SF office/ research + 1,500 residential units	6,800	4,050

Traffic Conditions

I-270 is experiencing traffic congestion in the study area. In addition, the existing roads within the study area lack the capacity and continuity to provide adequate accessibility to the planned development area. Full development as proposed by the City of Gaithersburg and the Montgomery County governments would overload the existing local transportation network. In 1998, the Average Daily Traffic (ADT) volume along I-270 in the study area was 119,600 vehicles, with failing levels of service (LOS) in the peak hours at the I-270/MD 124 interchange, as shown on Figure 4 and on Table 4.

NOTES:

1. The existing 1999 and 2020 No-Build volumes **DO NOT** include Watkins Mill Road Extended between MD 117 and MD 355.
2. The 2020 Build volumes include Watkins Mill Road Extended in place as a 4-lane roadway between MD 117 and I-270 and a 6-lane roadway between I-270 and MD 355, with a full interchange at I-270.

LEVELS OF SERVICE

INTERSECTION	1999 Existing ¹		2020 Build ²		2020 No-Build	
	AM	PM	AM	PM	AM	PM
MD 355 / MD 124	F (1.15)	F (1.38)	F (1.23)	F (1.58)	F (1.49)	F (1.84)
MD 117 / MD 124	C (0.75)	F (1.01)	F (1.00)	E (0.91)	F (1.04)	F (1.28)
Watkins Mill Rd/MD 365	C (0.78)	C (0.79)	E (0.99)	E (0.98)	F (1.36)	F (1.22)
Watkins Mill Rd/MD 117	F (1.27)	B (0.65)	D (0.88)	E (0.99)	D (0.86)	E (0.94)
Middlebrook Rd/MD 365	F (1.41)	F (1.35)	F (1.34)	F (1.70)	F (1.38)	F (1.84)

**PROPOSED
WATKINS
MILL ROAD
EXTENDED**

**Proposed Master Plan
location of Watkins Mill
Road Interchange at I-270**

**These volumes apply
only to Watkins Mill Road
directly east of MD 355**

LEGEND

- 10,000 = Existing 1999 Average Daily Traffic
- 10,000** = 2020 Build Average Daily Traffic
- 10,000 = 2020 No-Build Average Daily Traffic
(Without interchange or extension of Watkins Mill Road)

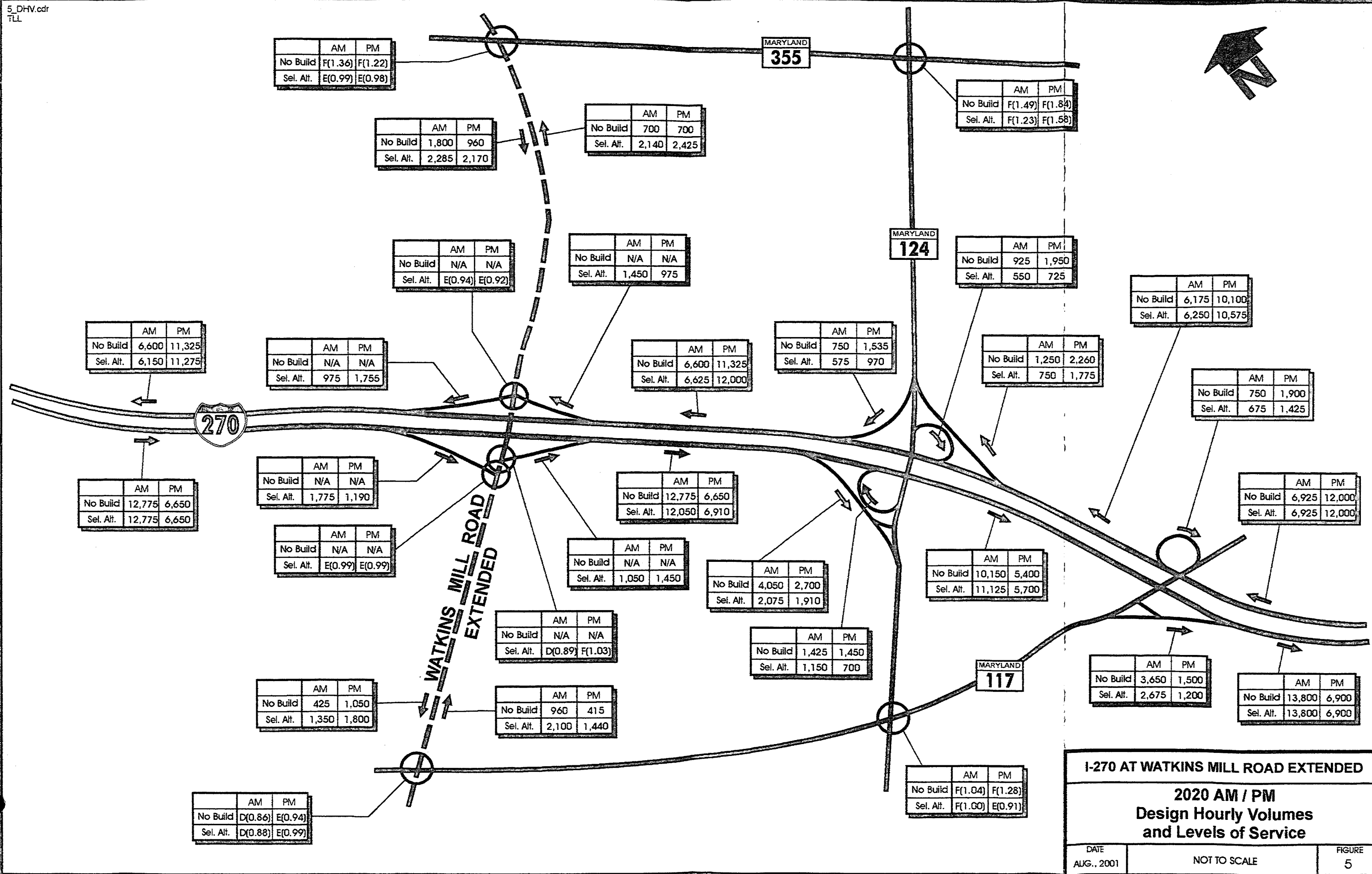
I-270 AT WATKINS MILL ROAD EXTENDED

**TRAFFIC VOLUMES AND
LEVELS OF SERVICE**

DATE
SEPT., 2001

NO SCALE

FIGURE
4



I-270 AT WATKINS MILL ROAD EXTENDED

2020 AM / PM Design Hourly Volumes and Levels of Service

DATE AUG., 2001	NOT TO SCALE	FIGURE 5

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TABLE 4
I-270 AVERAGE DAILY TRAFFIC (ADT) VOLUMES AND LEVELS OF SERVICE (LOS)

1999 Existing Traffic Conditions					
Location	ADT Volume	LOS Northbound		LOS Southbound	
		AM	PM (Peak Direction)	AM (Peak Direction)	PM
I-270 (North of Middlebrook Road)	86,100	B	D	E	B
I-270 (Between Middlebrook Road & MD 124)	119,600	B	E	E	B
I-270 (Between MD 124 & MD 117)	130,300	B	D	E	B
Projected 2020 Traffic Conditions					
I-270 (North of Middlebrook Road)	181,300	C	F	F	D
I-270 (Between Middlebrook Road & MD 124)	222,200	C	F	F	D
I-270 (Between MD 124 & MD 117)	203,650	C	F	F	C

TABLE 5
INTERSECTION LOS
AND VOLUME-TO-CAPACITY (V/C) RATIOS

INTERSECTION	1999 Existing LOS		2020 LOS No-Build		2020 LOS¹ W/Selected Alternate	
	AM	PM	AM	PM	AM	PM
MD 355/MD 124 ^{2,3}	F 1.15	F 1.38	F 1.49	F 1.84	F 1.23	F 1.58
MD 117/MD124 ³	C 0.75	F 1.01	F 1.04	F 1.28	F 1.00	E 0.91
Watkins Mill Road/ MD 355 ²	C 0.78	C 0.79	F 1.36	F 1.22	E 0.99	E 0.98
Watkins Mill Road/ MD 117	F 1.27	B 0.65	D 0.86	E 0.94	D 0.88	E 0.99
Middlebrook Road/ MD 355	F 1.41	F 1.35	F 1.38	F 1.84	F 1.34	F 1.70

¹Includes a full movement interchange between I-270 and Watkins Mill Road Extended with Watkins Mill Road Extended in place as a 4-lane roadway between MD 117 and I-270 and a 6-lane roadway between I-270 and MD 355.

²Includes improvements recently completed as part of the MD 355 project.

³Includes improvements proposed as part of the separate Congestion Relief Study (CRS).

LOS is a measure of the congestion experienced by drivers and ranges from A (free flow with little or no congestion) to F (failure with stop-and-go conditions). LOS is normally computed for the peak periods of the typical day, with LOS D (approaching unstable flow) or better generally considered acceptable for highways in urban and suburban areas. At LOS E, volumes are near or at the capacity of the highway. LOS F represents conditions in which there are operational breakdowns with stop-and-go traffic and extremely long delays at signalized intersections. The V/C Ratio is the volume of a roadway/intersection divided by the capacity of a roadway/intersection. When a roadway or intersection is at capacity, the V/C ratio is at 1.0, which means that the roadway or intersection is failing.

As indicated by the above level of service summaries, the existing roads throughout the study area are deficient in that they lack the capacity and continuity to provide adequate future accessibility and intermodal connections for employee, customer, and residential access to the planned economic development area.

As part of the economic development of northern Gaithersburg, intermodal connectivity to the existing MARC Service, the planned Corridor Cities Transitway (CCT) alignment, the feeder/local bus service and the existing and proposed roadway network is critical. Currently, the eastern half of the planned economic development center in northern Gaithersburg (IBM/Lockheed Martin and the Casey Tract East) cannot access I-270 or the transit station directly. In addition, the undeveloped western half of the planned economic development area in northern Gaithersburg is currently locked between the railroad tracks and I-270 without any access to any of the transportation network.

Accident Statistics

The accident history has been researched for the three year time period from 1996 through 1998 for the five major roadways in the Study Area - I-270, MD 117, MD 124, MD 355 and Watkins Mill Road. The number of accidents, severity of accidents (e.g., fatalities, injuries, property damage), and types of accidents (e.g., rear end, sideswipe, left turn, angle, pedestrian, etc.) were catalogued and compared to statewide averages for similar facilities. Notable findings from the accident data are as follows:

I-270 from MD 117 to Middlebrook Road

- The only type of accident significantly higher than the statewide average was rear end.
- High Accident sections occurred in:
1996 - - from 0.23 mi. S. to 0.27 mi. N. of Middlebrook Road

1997 - - from 0.12 mi. S. to 0.38 mi. N. of MD 124 and

1998 (2) - - from 0.22 mi. S. to 0.28 mi. N. of MD 124 and from 0.50 mi. S. of Middlebrook RD to Middlebrook Road

MD 117 from Great Seneca Highway to I-270

- Injury, property damage and total accidents were significantly higher than the statewide average.
- The types of accidents that were significantly higher than the statewide average included rear end, left turn, angle and fixed object.
- High Accident Intersections consisted of:
1996 - - MD 117 at Great Seneca Highway
1998 - - MD 117 at First Field Road
- High Accident Sections consisted of:
1996 - - from 0.02 miles east of Waring Station Road to 0.06 miles west of Game Preserve Road (west).

MD 124 from MD 117 to MD 355

- The only type of accident significantly higher than the statewide average was rear end.
- This segment contained no High Accident Intersections or High Accident Sections

MD 355 from MD 117 to Middlebrook Road

- Injury, property damage and total accidents were significantly higher than the statewide average.
- The types of accidents that were significantly higher than the statewide average included rear end, sideswipe, left turn, angle and pedestrian.
- Highway Accident Sections consisted of :
1998 (2) - - from 0.22 mi. S. to 0.28 mi. N. of MD 124 and from 0.50 mi. S. of Middlebrook Road to Middlebrook Road

Watkins Mill Road Entire Length (0.88 Mile)

- The only type of accident significantly higher than the statewide average was rear end.

- 34
- It is noted that average accident rates for county-maintained roads are not available. Therefore, the statewide average rates used here are derived from state-maintained highways designed similarly to Watkins Mill Road.

Intermodal Connectivity

As part of the economic development of northern Gaithersburg, intermodal connectivity to the existing MARC Service, the planned Corridor Cities Transitway (CCT) alignment, the feeder/local bus service and the existing and proposed roadway network is critical. Currently, the eastern half of the planned economic development center in northern Gaithersburg (IBM/Lockheed Martin and the Casey Tract East) cannot access I-270 or the transit station directly. In addition, the undeveloped western half of the planned economic development area in northern Gaithersburg is currently locked between the railroad tracks and I-270 without any access to any of the transportation network.

The study area is served by several transit agencies, including the Mass Transit Administration (MTA), the Washington Metropolitan Area Transit Authority (WMATA) and Montgomery County. These agencies provide the MTA Express Commuter Bus Service (#991), the Montgomery County Ride-On bus routes along MD 117 and MD 355 to the Shady Grove Metrorail Station, as well as regional Metrobus routes to Bethesda.

Commuter rail service is provided on the MARC Brunswick/CSX Transportation rail line. This rail line runs parallel to, and to the west of, I-270, and the line services areas between Martinsburg, West Virginia and Washington, D.C. Service is also provided to the City of Frederick via a "Meet the MARC" express bus connection at the Point of Rocks. The Metropolitan Grove MARC Station is within the study area, approximately 2,200 feet west of I-270, and includes a 353 space parking lot. Currently, the Metropolitan Grove Station is underutilized with only 138 average daily riders and 37% daily usage of the existing Metropolitan Grove MARC Station parking lot. This is low for a MARC Station, when compared to other MARC Stations. The Maryland MTA attributes the under-utilization of the Metropolitan Grove MARC Station to several issues, including:

- Low densities around the Metropolitan Grove MARC Station (37% of the 353 spaces used) compared to the Olde Towne Gaithersburg MARC Station (95% of the 280 spaces used) or the Germantown Station (50% of the 657 spaces used).
- Difficult road accessibility to the Metropolitan Grove MARC Station. This can be attributed to indirect access between the station and the interstate system, as well as

heavy congestion surrounding the interstate and arterial roadways, such as MD 117 and MD 124, in the vicinity of the station.

- The Olde Towne Gaithersburg MARC Station is closer to and in the general direction of morning MARC travelers with a more direct southern access.

In addition, this station is planned to serve the locally proposed Metropolitan Grove Corridor Cities Transitway (CCT) Station (same location), which is on both the city and county master plans, as well as part of the I-270/US 15 Multi-Modal Corridor Study. The provision of improved access or relocation is necessary to achieve optimum utilization of the mass transit system to accommodate the planned economic development area.

As indicated by the above level of service summaries, the existing roads throughout the study area are deficient in that they lack the capacity and continuity to provide adequate future accessibility and intermodal connections for employee, customer, and residential access to the planned economic development area.

3. Project History

The I-270 at Watkins Mill Road extended interchange was previously included in the I-270/US 15 Multi-Modal Corridor Study and was shown as such in the Development and Evaluation Program of previous Consolidated Transportation Programs (CTP). The I-270/Watkins Mill Road Extended project comprises a 2-mile long segment along I-270 within the project limits for the I-270/US 15 Multi-Modal Corridor Study, which covers 30 miles along I-270 and US 15 extending from Shady Grove Metrorail Station to Biggs Ford Road. At the request of Montgomery County and the City of Gaithersburg, the I-270/Watkins Mill Road Extended project is included as a separate project in the Development and Evaluation Program of the 1999 - 2004 CTP. The I-270 at Watkins Mill Road extended interchange study can function with or without the I-270/US 15 Corridor Study and therefore has independent utility. The purpose and need, as well as the study area, for these two projects are different, with the I-270/US 15 study addressing mainline corridor capacity issues and this project addressing primarily local access issues.

The I-270/US 15 Multi-Modal Study is considering several combinations of transit and highway strategies within the I-270 at Watkins Mill Road project area. The highway component of each of the build alternates includes a two-lane Collector-Distributor (C-D) roadway in each direction, outside the existing I-270 mainline roadways. The left lane in each direction of the main line would be for High Occupancy Vehicles (HOV). The Selected Alternate for the I-270

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at Watkins Mill Road Extended project planning study has been developed with full consideration of the Corridor Study's proposed typical sections.

Within this project's study area, there are several transportation improvements by the State Highway Administration (SHA) that are in various stages of design or construction. This includes the recently completed widening of MD 355 (Frederick Road) between MD 124 and Game Preserve Road from a four-lane undivided roadway to a six-lane median divided roadway, similar to MD 355 south of MD 124. In addition, the interchange of MD 124 and I-270 is under construction for improvements to the ramps on the west side of the existing interchange to eliminate weaving conflicts along southbound I-270. These improvements include the addition of ramp lanes from I-270 southbound to MD 124 westbound and eastbound, as well as the removal of the loop ramp in the southwest quadrant of the interchange. As part of this project, the land in the southwest quadrant, where the existing loop ramp will be removed, will be utilized to implement a 400+ space park and ride lot, with an informational kiosk and bus connections. Finally, just south of the study area, final design is underway for interchange improvements to MD 117 and I-270 to add a missing interchange movement and a park and ride lot. SHA is also implementing minor widening of the MD 355/MD 124 and MD 124/MD 117 intersections to improve capacity.

Traffic Calming

In response to comments received at the project's public workshop and from the Focus Group, traffic calming measures are under consideration for Watkins Mill Road, from the City limits to Russell Avenue, and for Pheasant Run, from MD 117 to Longdraft Road. These sections of local roadways extend beyond the project limits and fall under the responsibility of local jurisdictions, namely Montgomery County and the City of Gaithersburg. The following is a summary of possible traffic calming measures proposed by the city and county.

City of Gaithersburg

The following mitigation measures have been provided as a starting point for staff and residents to discuss their advantages and disadvantages on traffic flow, speeds, circulation and accessibility.

Watkins Road (City Limits to Russell Avenue)

- Landscaped medians where current striped median exist to narrow down the road width, potentially reducing speeds.

- Incorporate a traffic signal, roundabout or raised crosswalks with textured pavement and pedestrian refuge areas at the Travis Avenue intersection.
- The Russell Avenue intersection may incorporate signalization, raised crosswalks, textured pavement and pedestrian refuge areas in the median.

Pheasant Run Drive (Clopper Road to Longdraft Road)

- Raised crosswalk textured pavement and pedestrian refuge areas at Perrywinkle Lane and Tech Park 270 entrance.
- Raised crosswalks, textured pavement and pedestrian refuge areas at Rabbit Road.
- Chokers, mid-block narrowings or yield points could be constructed along some stretches of the entire length of the road to reduce roadway widths. Sometimes on-street parking is lost with mid-block narrowings.
- Consideration should be given to restricting through traffic from Watkins Mill Road onto Pheasant Run Road. Traffic that wanted to continue through to Longdraft Road could bypass this street entirely and be directed to the intersection of MD 117 and Longdraft Road. This could be done either through signal timing, channelization or through signage.

Montgomery County Department of Transportation and Public Works

On Watkins Mill Road, from the City of Gaithersburg limits to Great Seneca Creek, the following represents a list of potential applications which will be studied in more detail once a final I-270/Watkins Mill Road Interchange alternate is selected, designed, and constructed:

- Residents would be encouraged to participate in the Speed Watch program, and DPWT will schedule periodic deployment of the SMART (Speed Monitoring Awareness Radar Trailer - a portable, self-operating radar and speed display unit that can be used to promote speed awareness).
- DPWT will conduct speed studies and an engineering evaluation to determine whether traffic calming devices or other traffic safety measures are justified, after new traffic patterns and operations are normalized. Resident and citizen association input will be critical and will be used to develop a plan.
- Enforcement will be enhanced in coordination with the above actions and where specific safety problems are identified.

Other traffic calming which will be reviewed for application to Watkins Mill Road are:

- Traffic Circles (if designed to accommodate full movement by trucks and buses)
- Curb Extensions;
- Median or Pedestrian Refuge Islands (where not currently employed);
- Pavement Edgelines to narrow wide roadway to create parking lane or shoulder (already employed in vicinity of schools along A-17); and
- Chokers and Chicanes.

Both the City of Gaithersburg and Montgomery County have designated the I-270 project at Watkins Mill Road Extended as a transportation priority. Funding is currently programmed only for the project-planning phase. Funds for final engineering, right-of-way acquisition and construction are not programmed at the present time.

B. Alternates

1. Alternates Presented at the Location/Design Public Hearing on January 16, 2001.

a. Alternate 1: No-build Alternate

The No-Build Alternate would have consisted only of routine maintenance, minor construction projects and developer-based improvements associated with new developments. These minor improvements would not be expected to improve roadway capacity, safety or accessibility to the growth areas of northern Gaithersburg.

The No-Build Alternate was not selected because it would have provided no transportation improvements to the project area and therefore, would not satisfy the project's purpose and need of providing improved vehicular, pedestrian, bicycle and transit access to and from the transportation network and improving access to the Metropolitan Grove MARC Station.

Build Alternates

All of the following build alternates presented at the public hearing included the extension of Watkins Mill Road between MD 117 and MD 355 with an overpass of I-270. However, the Watkins Mill Road extension east and west of I-270, but not the overpass, would likely be constructed by others in conjunction with the planned development of the area. Also,

all of the build alternates presented require improvements to the Watkins Mill Road Extended intersections with MD 117 and MD 355 which include additional turn lanes and enough storage space in all of the lanes to provide an acceptable level of service at these intersections. In addition, the build alternates were developed with full consideration of the I-270/US 15 Multi-Modal Corridor Study's proposed typical sections.

b. Alternate 2: Partial Cloverleaf Interchange

Alternate 2 was similar to the concept developed as part of Montgomery County's 1998 engineering feasibility study. It would have provided an interchange at Watkins Mill Road Extended that consisted of a diamond configuration on the northbound (east) side of I-270 and a partial cloverleaf on the southbound (west) side of I-270. Alternate 2 used a two-lane Collector-Distributor (C-D) roadway system on each side of I-270 to handle local traffic weaving on and off of I-270. No ramps would have been built in the environmentally sensitive southwest quadrant of the interchange. Under Alternate 2, Watkins Mill Road was proposed as a four lane divided roadway from MD 117 to approximately 1,500 feet west of I-270 and a six lane divided roadway from that point to MD 355.

Alternate 2 was not selected because of the extent of the environmental impacts that would result. Alternate 2 would have impacted 6.3 acres of parkland and 1.08 acres of wetlands and would have displaced one residence. In addition, Alternate 2 would have required extensive grading and stream relocation due to the loop ramp configuration in the northwest quadrant. The Corps of Engineers (COE) maintained serious permitting concerns for Alternate 2 because other practical alternates existed that would be less damaging to local aquatic resources.

c. Alternate 2A: Partial Cloverleaf Interchange with Median HOV Ramps

Alternate 2A would have been the same as Alternate 2, with direct HOV access ramps to the Watkins Mill Road Extended bridge over I-270. This combination would have provided a full movement general use interchange with separate interchange ramps for HOV.

Alternate 2A was not selected because of the extent of the environmental impacts that would result, similar to Alternate 2.

d. Alternate 3: Full Diamond Interchange (Selected with revisions - See Sections III.B.2 and III.B.3)

Alternate 3 consists of a diamond configuration on both the northbound (east) and southbound(west) sides of I-270 at Watkins Mill Road Extended. It would have used a two-lane

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C-D system on the northbound side of I-270 only. Braided ramps which require additional right-of-way would be used in the southwest quadrant of the interchange because of inadequate weaving distance along southbound I-270. Under Alternate 3, Watkins Mill Road is proposed as a four-lane divided roadway from MD 117 to approximately 1,500 feet west of I-270 and a six-lane divided roadway from that point to MD 355.

e. Alternate 4: Partial Interchange

Alternate 4 would have consisted of a partial diamond interchange at I-270 and Watkins Mill Road Extended. Movements would only have been allowed from Watkins Mill Road Extended to northbound I-270 and from southbound I-270 to Watkins Mill Road Extended. No access would have been provided from northbound I-270 to Watkins Mill Road Extended or from Watkins Mill Road Extended to southbound I-270. Under Alternate 4, Watkins Mill Road was proposed as a four-lane divided roadway for the entire length between MD 117 and MD 355. This alternate would have resulted in close signal spacing on Watkins Mill Road Extended.

Alternate 4 was not selected because it would not provide all of the traffic movements between I-270 and Watkins Mill Road and therefore, would not adequately address the project's purpose and need of providing improved vehicular, pedestrian, bicycle and transit access to and from the existing and planned development transportation network and improving access to the Metropolitan Grove MARC Station. The traffic operational benefits with regard to interstate accessibility and reduced congestion would be significantly less with this alternate as compared to a full movement interchange. Traffic projections indicated that the traffic not carried by the missing ramps would divert to MD 117 and MD 124, increasing traffic congestion on these road segments, which are expected to have failing levels of service in 2020. In addition, FHWA and area citizens registered concerns about constructing another partial interchange on I-270 so close to the three other partial interchanges located at Middlebrook Road, MD 124 and MD 117.

f. Alternate 4A: Partial Interchange with Median HOV Ramps

Alternate 4A would have been the same as Alternate 4, with direct HOV access ramps to the Watkins Mill road Extended bridge over I-270. This combination would have provided a partial general use interchange with a full movement HOV interchange.

Alternate 4A was not selected because, similar to Alternate 4, it would not provide all of the traffic movements between I-270 and Watkins Mill Road and therefore, would not adequately address the project's purpose and need of providing improved vehicular, pedestrian, bicycle and transit access to and from the existing and planned development transportation network and improving access to the Metropolitan Grove MARC Station.

cll

g. Alternate 6: Watkins Mill Road Extended without Interchange

Alternate 6 would have consisted of the extension of Watkins Mill Road from MD 117 east across I-270 and connecting to MD 355. It is included in the "no-build" or "baseline" scenario for the Metropolitan Washington Council of Government's travel demand model for the Washington region in the Constrained Long Range Plan (CLRP). This alternate did not include a conventional interchange of Watkins Mill Road and I-270 with access for general use traffic. Under Alternate 6, Watkins Mill Road was proposed as a four-lane divided roadway for the entire length between MD 117 and MD 355.

Alternate 6 was not selected because it would not provide general-purpose traffic access from Watkins Mill Road to I-270 and therefore, would not adequately address the project's purpose and need of providing improved vehicular, pedestrian, bicycle and transit access to and from the existing and planned development transportation network and improving access to the Metropolitan Grove MARC Station. In addition, although Alternate 6 might minimize traffic congestion at the Watkins Mill Road tie-in points on MD 117 and MD 355 compared to the other build alternates, it would not address traffic congestion at other points in the study area overall.

h. Alternate 6A: Watkins Mill Road Extended with Median HOV Ramps

Alternate 6A would have been the same as Alternate 6, with direct HOV access ramps to the Watkins Mill Road Extended bridge over I-270. This combination would have provided a full movement HOV interchange at Watkins Mill Road Extended, with no general use interchange.

Alternate 6A was not selected because, similar to Alternate 6, it would not provide general purpose traffic access from Watkins Mill Road to I-270 and therefore, would not adequately address the project's purpose and need of providing improved vehicular, pedestrian, bicycle and transit access to and from the existing and planned development transportation network and improving access to the Metropolitan Grove MARC Station.

Avoidance/Minimization Options

The following three avoidance/minimization options were presented at the public hearing to minimize impacts to Seneca Creek State Park and the wetlands and stream tributary of the Great Seneca Creek parallel and west of I-270.

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i. Western C-D Shift Option

The Western C-D Shift Option would have consisted of the same basic interchange design as Alternate 2 but it included a shift of the southbound I-270 C-D lanes 500 - 800 feet west of existing I-270 (to the west side of the stream and wetland system running parallel to I-270). The Western C-D Shift Option would have provided a full diamond, full access interchange at I-270 and Watkins Mill Road Extended.

The Western C-D Shift Option was not selected because it would have the highest right-of-way acquisition required from business/commercial properties of all the alternates, it would have the highest total right-of-way impacts of all the alternates, and traffic operations would be inferior under this alternate as a result of the weave section on the southbound C-D roadway between Watkins Mill Road and MD 124. This alternate would have displaced one residence. In addition, the C-D Western Shift Option would not be consistent with the proposed master planned Town Center on the Casey West tract. This alternate also would have the highest cost of all the build alternates.

j. Mainline Eastern Shift Option

The Mainline Eastern Shift Option was similar to Alternate 2 but it included a shift of the entire mainline of I-270 as much as 45 feet east to preclude any highway widening west of existing I-270 in the vicinity of the wetland/stream system. The Mainline Eastern Shift Option would have provided a partial cloverleaf, full access interchange at I-270 and Watkins Mill Road Extended.

The Mainline Eastern Shift Option, an option to Alternate 2 developed to minimize impacts to aquatic resources, was not selected because, overall it would still affect the same amount of wetlands (1.08 acres). In addition, this alternate would have displaced one residence.

k. Northbound Braided Ramps Option

The Northbound Braided Ramps Option would have applied only to northbound I-270 between MD 124 and Seneca Creek State Park, under either Alternate 2 or 3. It would have provided a means by which westbound MD 124 traffic destined for northbound I-270 would not need to weave with northbound I-270 traffic destined for Watkins Mill Road or eastbound MD 124 traffic destined for northbound I-270. The ramp from Watkins Mill Road to northbound I-270 would then merge onto mainline I-270 prior to the crossing of the Seneca Creek State Park which would avoid Section 4(f) impacts in the northbound direction at Great Seneca Creek Park.

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The Northbound Braided Ramps Option, an option developed to minimize impacts to Great Seneca Creek Park, was not selected because it would affect the largest amount of linear feet of Waters of the U.S. of all the alternates and would require the greatest amount of stream relocation of all the alternates. In addition, this option would not be compatible with ultimate northbound C-D roadways, if selected.

Access Options

The following three access options, that could be considered in conjunction with any build alternate, were also presented at the public hearing. As per local master plans, the access options were developed in order to allow for pedestrian, bicycle and vehicular access to transit, such as MARC, bus and the master planned Corridor Cities Transitway.

I. Access Option A: HOV Direct Access

Access Option A would have allowed high occupancy vehicles direct access between I-270 and Watkins Mill Road Extended via a median interchange at Watkins Mill Road Extended, separate from the general use traffic. This option would have been viable with Alternates 2, 4 and 6.

Access Option A was not selected because of operational concerns that would be associated with three signalized intersections in close proximity on the bridge over I-270, the impacts that would be associated with widening the I-270 median given the mainline shifts that would also be necessary in the interchange area, and the fact that consideration of median HOV connections along I-270 are being undertaken as part of the I-270/US 15 Corridor Study.

m. Access Option B: Metropolitan Court Extended

Access Option B would have provided improved access from I-270 and Watkins Mill Road Extended for general use traffic to the Metropolitan Grove MARC Station. Access would have occurred through a northern extension of Metropolitan Court to Watkins Mill Road just west of the CSX tracks. This option would have provided bicycle and pedestrian accommodation alongside Metropolitan Court extended. Access Option B would have been viable with Alternates 2, 3, 4 and 6.

Access Option B was not selected because of the impacts that would result to properties through which the roadway extension would have been located. Over 100 parking spaces that serve the various biotechnology firms in the area would be eliminated, placing the buildings in non-compliance with established long-term lease agreements. In lieu of Access Option B and separate from this project, the City of Gaithersburg is supporting a recreational trail, with no

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vehicular access, that would connect Watkins Mill Road with the MARC station and would be located along the Option B alignment.

n. Access Option C: MD 124 Access Ramp

Access Option C would have provided direct access from I-270 to the Master Planned Corridor Cities Transitway (light rail or bus) Station, as well as a relocated Metropolitan Grove MARC Station on the east side of the CSX tracks, via the I-270/MD 124 Interchange. This option would also have provided an access road for the planned economic development on the east side of the CSX tracks to the transit station(s). Option C would have provided bicycle and pedestrian access on the northern part of the new access road between the relocated MARC Station and Watkins Mill Road Extended. The Corridor Cities Transitway (CCT) Station is being addressed as part of the I-270/US 15 Multi-Modal Study. Access Option C would have been viable with Alternates 2, 3, 4 and 6.

Access Option C was not selected because of operational concerns that would result from the additional traffic volumes that would be placed on the MD 124 exit ramp from southbound I-270 with the MARC/CCT station connection. (The Selected Alternate, described in Section III.B.3, includes a modified version of Option C which consists of a roadway connection, possibly integrated with the proposed Town Center planned development roadway network, to provide direct access from Watkins Mill Road to the MARC/CCT station between I-270 and the MARC tracks.)

2. Alternates Revised Following the Location/Design Public Hearing

Several alternates were revised subsequent to the Location/Design Public Hearing to address public concerns, to provide compatibility with preliminary I-270/US 15 Study findings, to address U.S. Army Corps of Engineers stream impact concerns and to limit increases in costs and impacts.

a. Alternate 2 - Western C-D Shift

As presented at the public hearing, the Western C-D Shift, which was developed as an option to Alternate 2 to minimize impacts to aquatic resources, would result in extensive right-of-way impacts affecting a large number of business/commercial properties. In addition, one residential displacement would occur. In order to lessen the right-of-way impacts and eliminate the residential displacement, the following revisions were implemented: provide painted southbound I-270 C-D lanes rather than barrier-separated C-D lanes and shift the C-D alignment slightly east to the south of Watkins Mill Road and incorporate a closed section. This variation

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of Alternate 2 - Western C-D Shift, referred to as Alternate 2 Revised, was under consideration subsequent to the public hearing and is shown on Figure 6.

Alternate 2 Revised was not selected because it would result in inferior traffic operations as a result of the weave section on the southbound C-D roadway between Watkins Mill Road and MD 124.

b. Alternate 3

In response to comments concerning Alternate 3, several revisions were undertaken, subsequent to the public hearing, to provide the following:

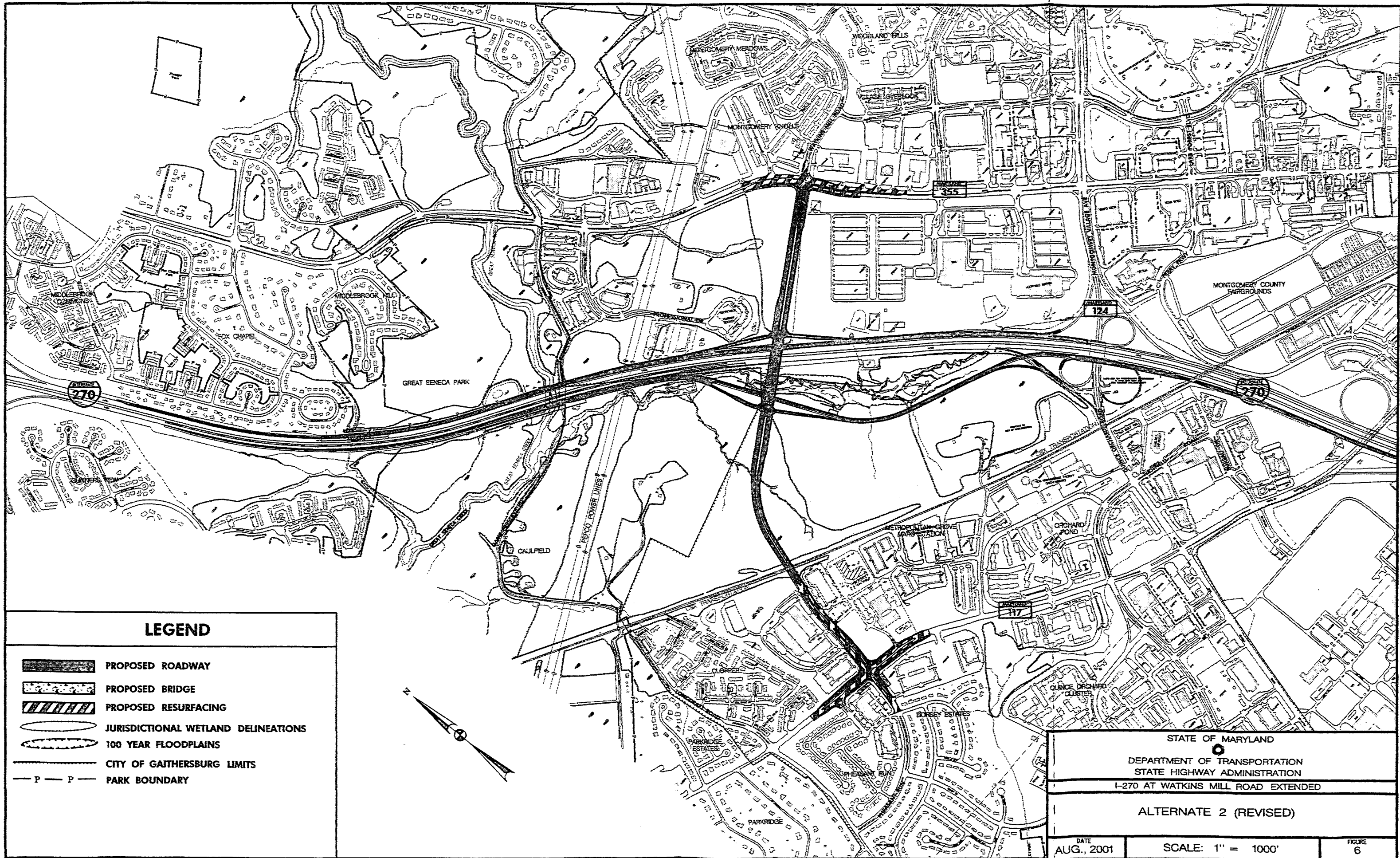
- painted southbound I-270 C-D lanes (Previously no southbound C-D lanes were included with Alternate 3, only an additional southbound lane.)
- a mainline eastern shift of up to 19-feet in combination with a 675-linear feet retaining wall between the southbound C-D lanes and the stream tributary on the west side of I-270 to minimize the relocation of the stream tributary and utilities.
- a realigned ramp from southbound I-270 to minimize impacts to the Caulfield community, a combination of retaining wall and stream relocation near the ramp's diverge point, and a bridge at the ramp's crossing of the stream tributary.

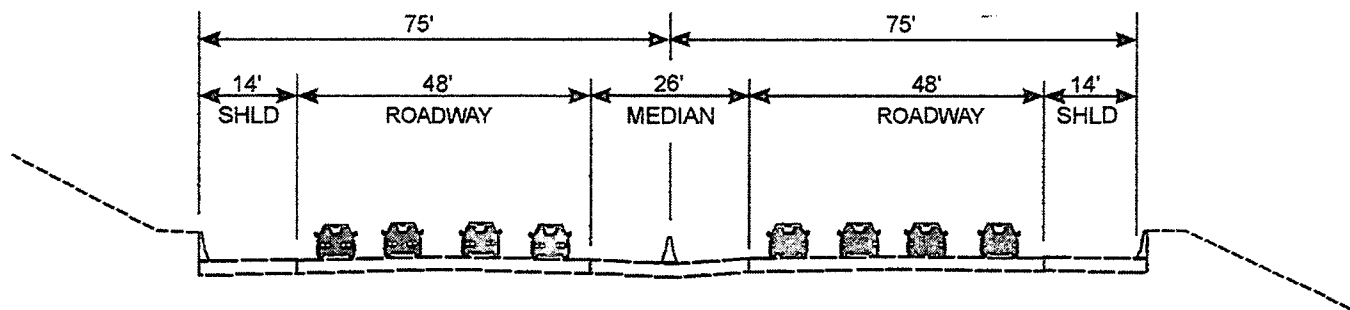
These revisions would provide compatibility with the I-270/US 15 Multi-Modal Corridor Study and would minimize impacts to aquatic resources. Also, right-of-way impacts would be reduced. The full movement provided by the full diamond configuration of this alternate's interchange would maintain consistency with the City of Gaithersburg master plan and would provide the necessary traffic operation improvements that would decrease traffic volumes on the MD 124 and MD 117 interchanges with I-270.

3. The Selected Alternate: Alternate 3 Revised (Figures 9 - 16)

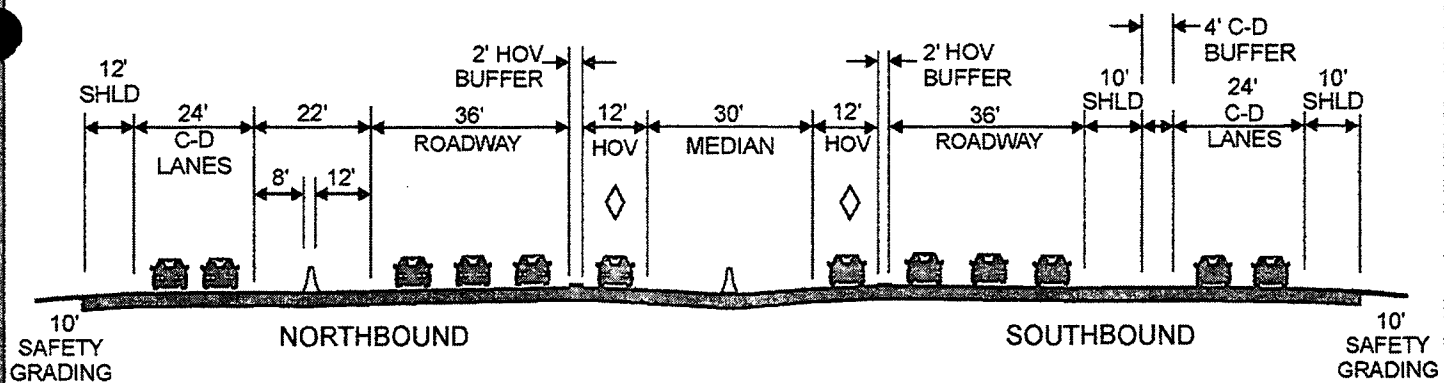
Alternate 3 Revised consists of a full diamond interchange to minimize right-of-way impacts and allow flexibility in avoiding stream impacts. It incorporates all the revisions made subsequent to the public hearing, as discussed above, providing painted southbound I-270 C-D lanes and barrier-separated northbound I-270 C-D lanes, along with the three through lanes and HOV lane, in each direction, as shown on Figure 7.

Watkins Mill Road Extended would consist of a four-lane divided roadway from MD 117 to approximately 1,000 feet west of I-270 and a six-lane divided roadway from that point to MD





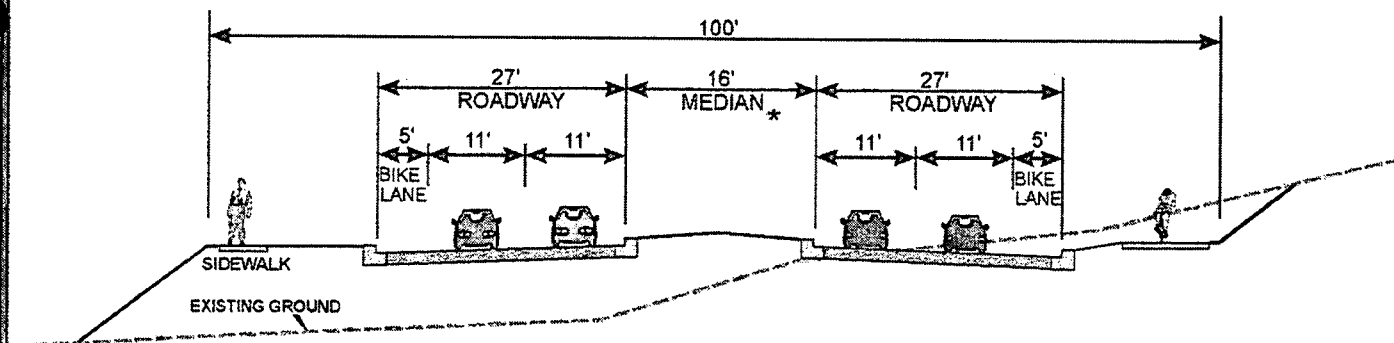
I-270 NORMAL SECTION - EXISTING



ULTIMATE I-270 TYPICAL SECTION WITH ALT. 3 REVISED - SELECTED ALTERNATE

NOTE:
THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF
DETERMINING COST ESTIMATES AND ENVIRONMENTAL
IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE
FINAL DESIGN PHASE.

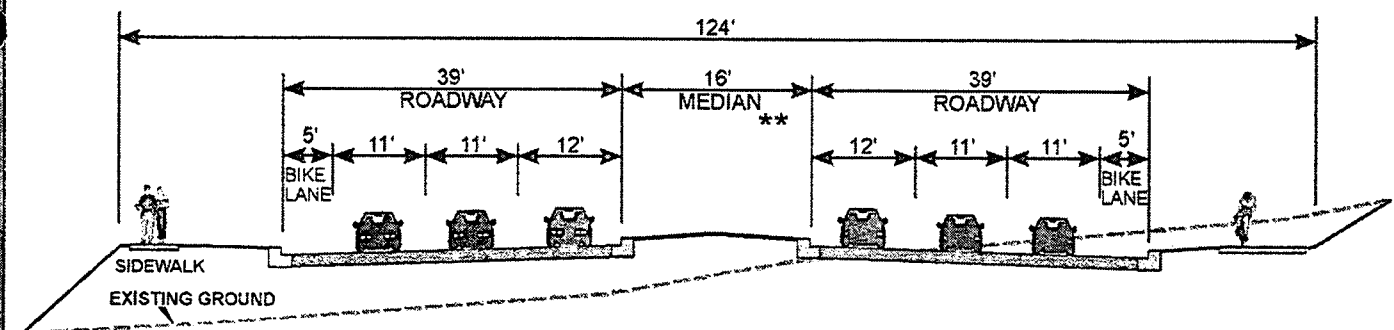
I-270 AT WATKINS MILL ROAD EXTENDED		
TYPICAL SECTIONS		
I-270 MAINLINE		
SELECTED ALTERNATE		
BETWEEN MD 117 AND MIDDLEBROOK ROAD		
DATE AUG., 2001	NO SCALE	FIGURE 7



NORMAL SECTION - 4 LANE DIVIDED ARTERIAL HIGHWAY
Watkins Mill Road Extended

Applies from MD 117 to 2,000 feet± west of I-270

* Median would be widened to 28 feet to provide double left turns at MD 117



NORMAL SECTION - 6 LANE DIVIDED ARTERIAL HIGHWAY
Watkins Mill Road Extended

Applies from 2,000 feet± west of I-270 to MD 355

**Median would be widened to 28 feet to provide double left turns at I-270 interchange ramps, and to 40 feet to provide triple left turns at MD 355

NOTE:
THE DIMENSIONS SHOWN ARE FOR THE PURPOSE OF
DETERMINING COST ESTIMATES AND ENVIRONMENTAL
IMPACTS, AND ARE SUBJECT TO CHANGE DURING THE
FINAL DESIGN PHASE.

I-270 AT WATKINS MILL ROAD EXTENDED

**TYPICAL SECTIONS
WATKINS MILL ROAD EXTENDED
SELECTED ALTERNATE**

DATE
SEPT., 2001

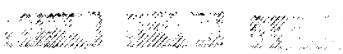
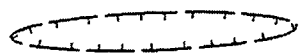
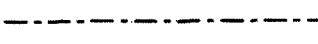
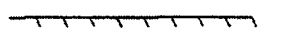
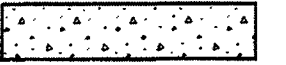
NO SCALE

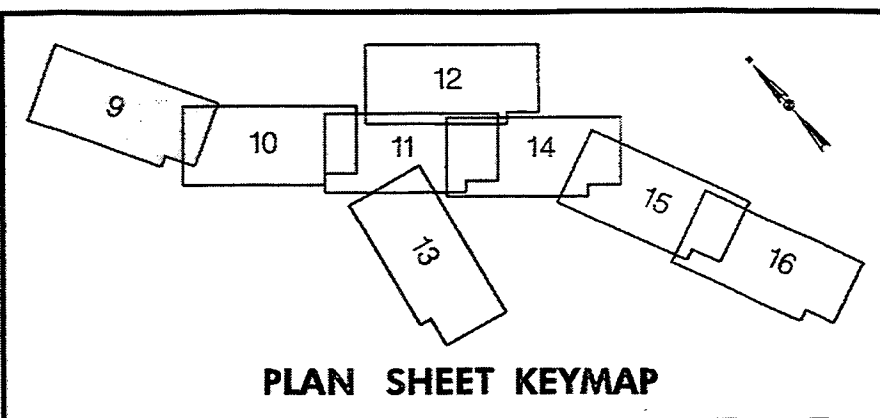
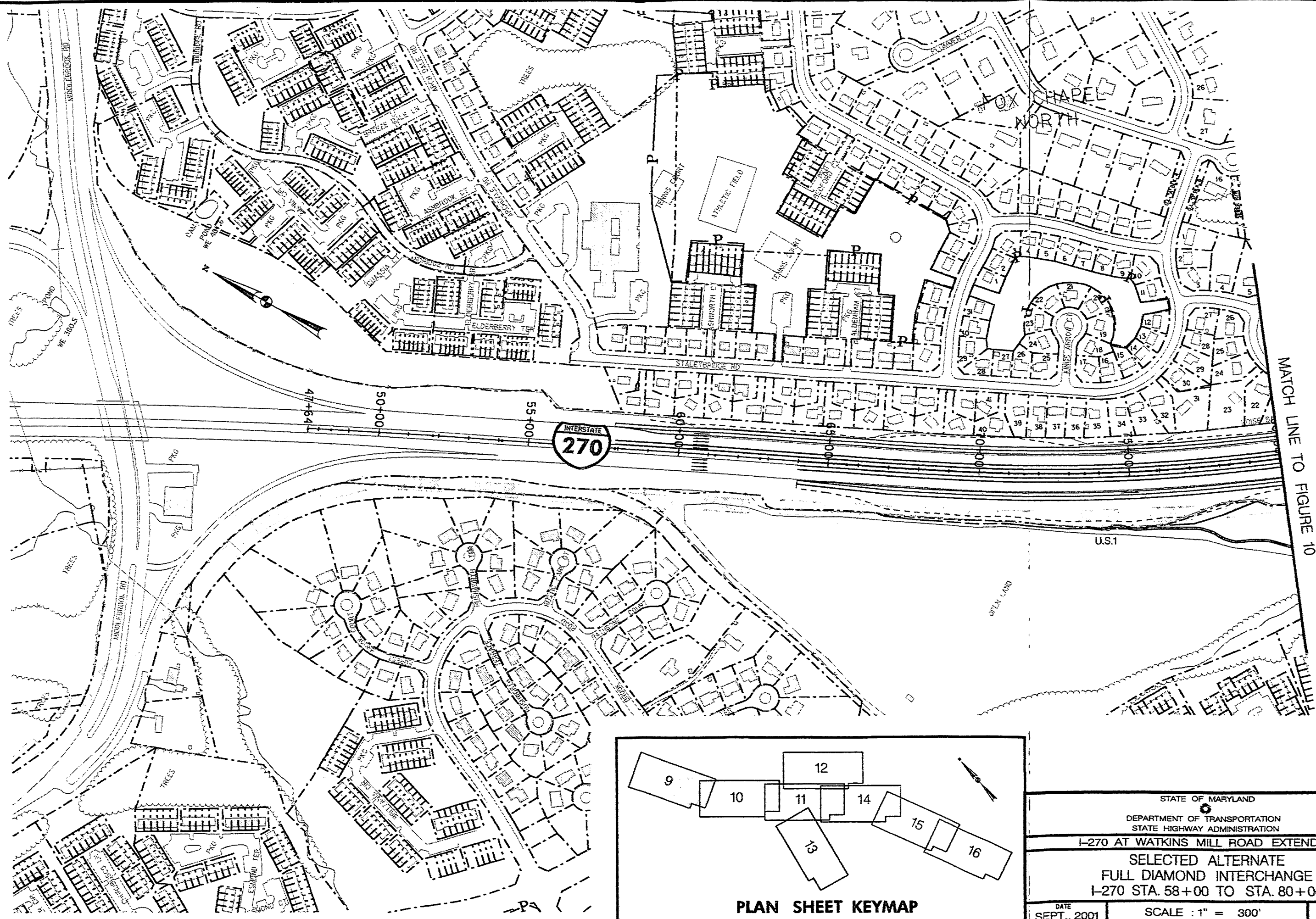
FIGURE
8

LEGEND

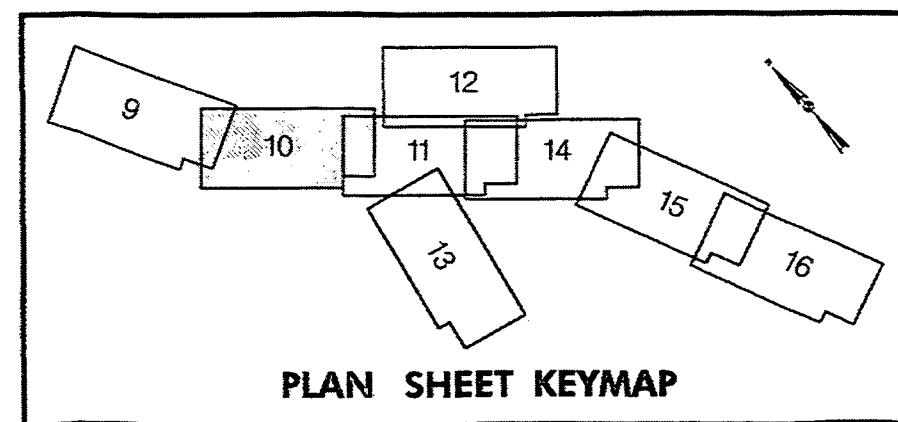
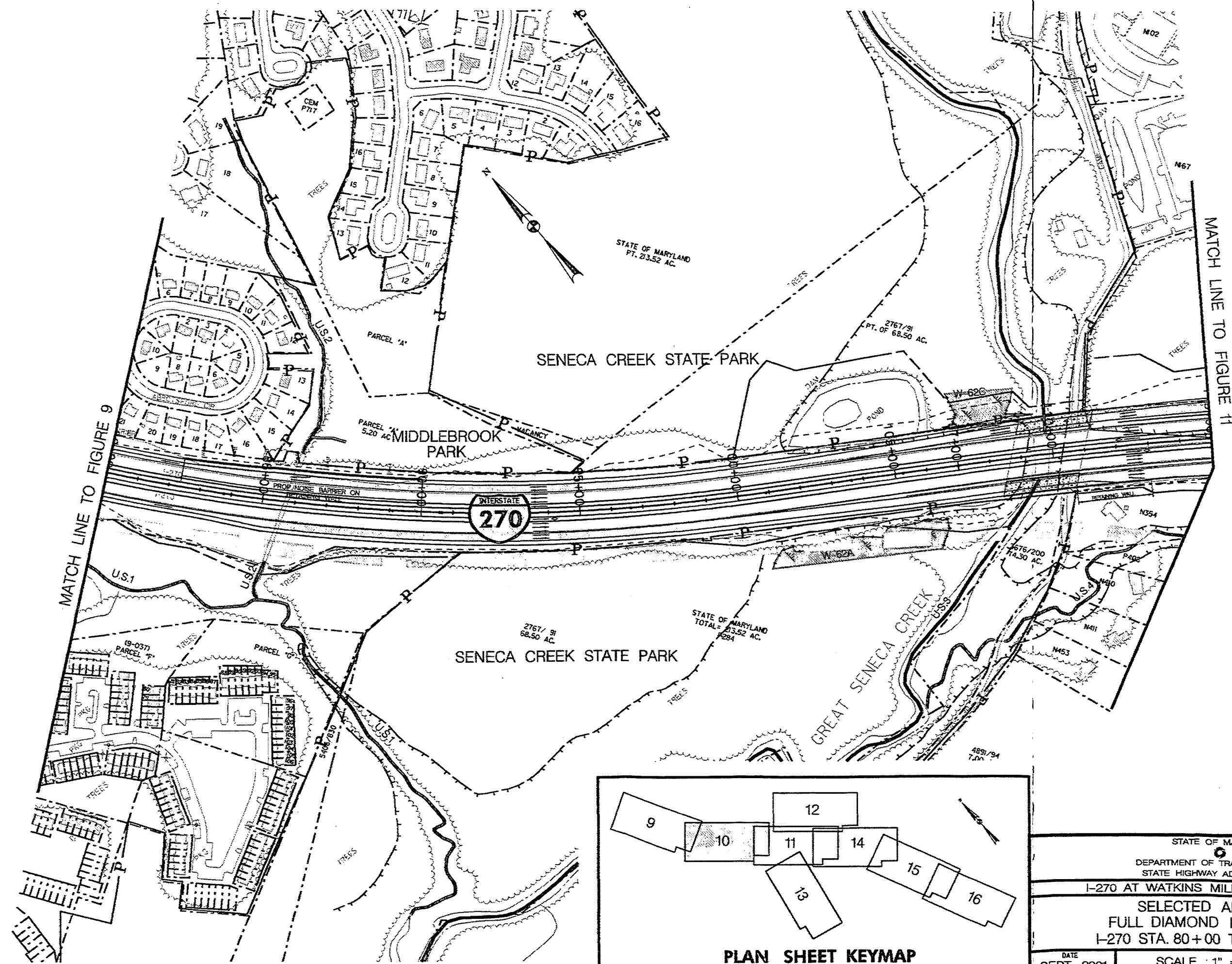
SELECTED ALTERNATE PLAN SHEETS

FIGURES 9-16

-  MASTER PLANNED CORRIDOR CITIES
TRANSITWAY ALIGNMENT (SUBJECT TO
REFINEMENT UNDER I-270 / US 15 MULTI-
MODAL CORRIDOR STUDY)
-  JURISDICTIONAL WETLAND DELINEATIONS
-  100 YEAR FLOODPLAINS
-  WATERS OF THE U.S.
-  TREE LINE
-  PROPERTY LINES
-  PARK BOUNDARY
-  CITY OF GAITHERSBURG LIMITS
-  EXISTING RETAINING WALL
-  PROPOSED ROADWAY
-  PROPOSED STRUCTURE
-  LANE CONFIGURATION

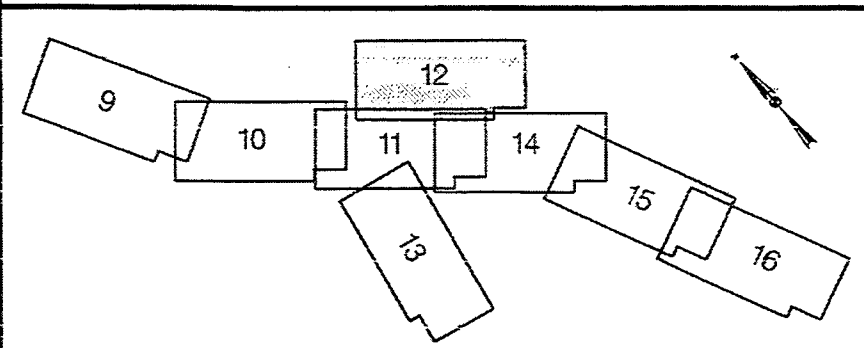
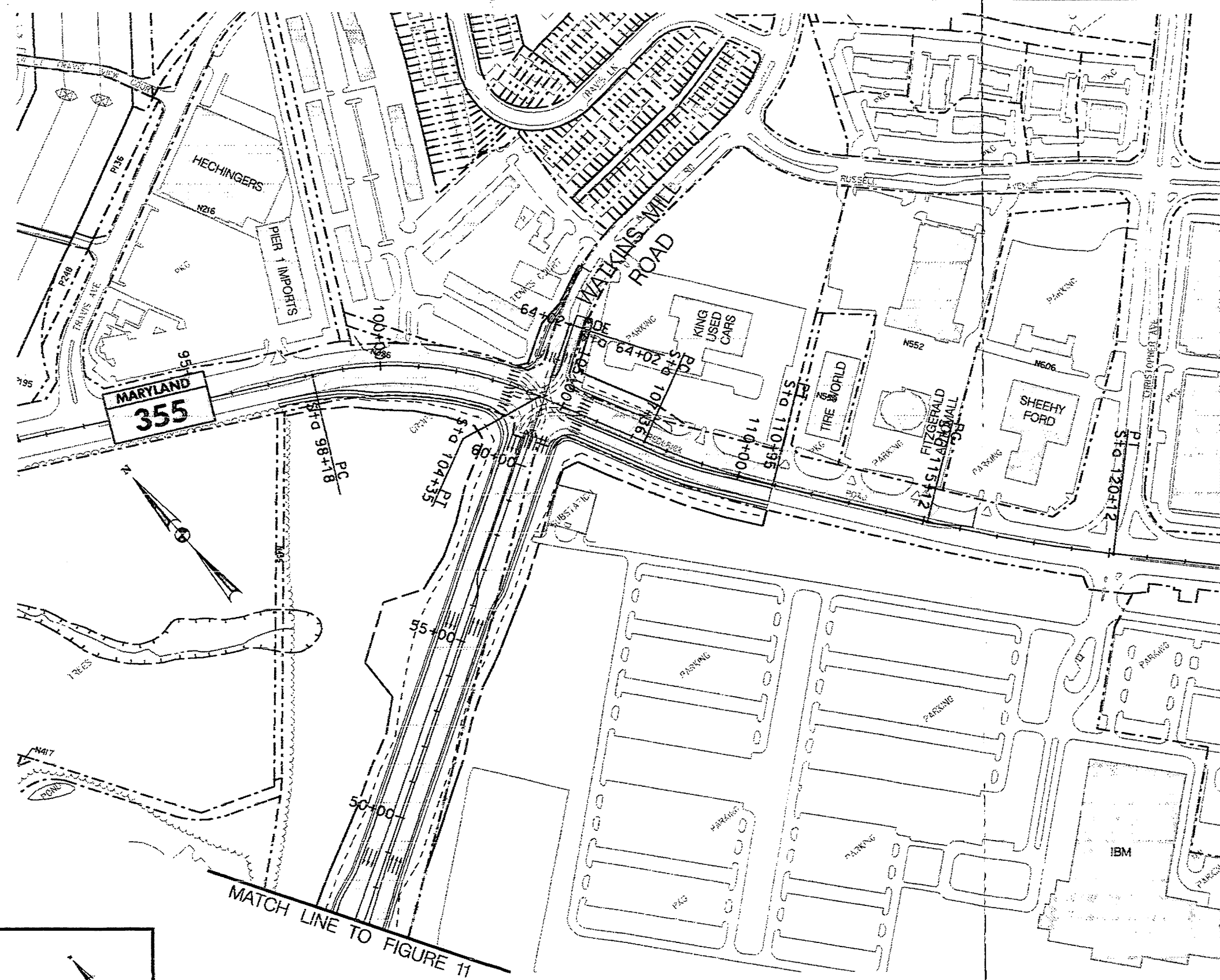


STATE OF MARYLAND		
DEPARTMENT OF TRANSPORTATION		
STATE HIGHWAY ADMINISTRATION		
I-270 AT WATKINS MILL ROAD EXTENDED		
SELECTED ALTERNATE		
FULL DIAMOND INTERCHANGE		
I-270 STA. 58+00 TO STA. 80+00		
DATE	SCALE : 1" = 300'	FIGURE
SEPT., 2001		9



STATE OF MARYLAND		
DEPARTMENT OF TRANSPORTATION STATE HIGHWAY ADMINISTRATION		
I-270 AT WATKINS MILL ROAD EXTENDED		
SELECTED ALTERNATE FULL DIAMOND INTERCHANGE I-270 STA. 80+00 TO STA. 115+00		
DATE SEPT., 2001	SCALE : 1" = 300'	FIGURE 10

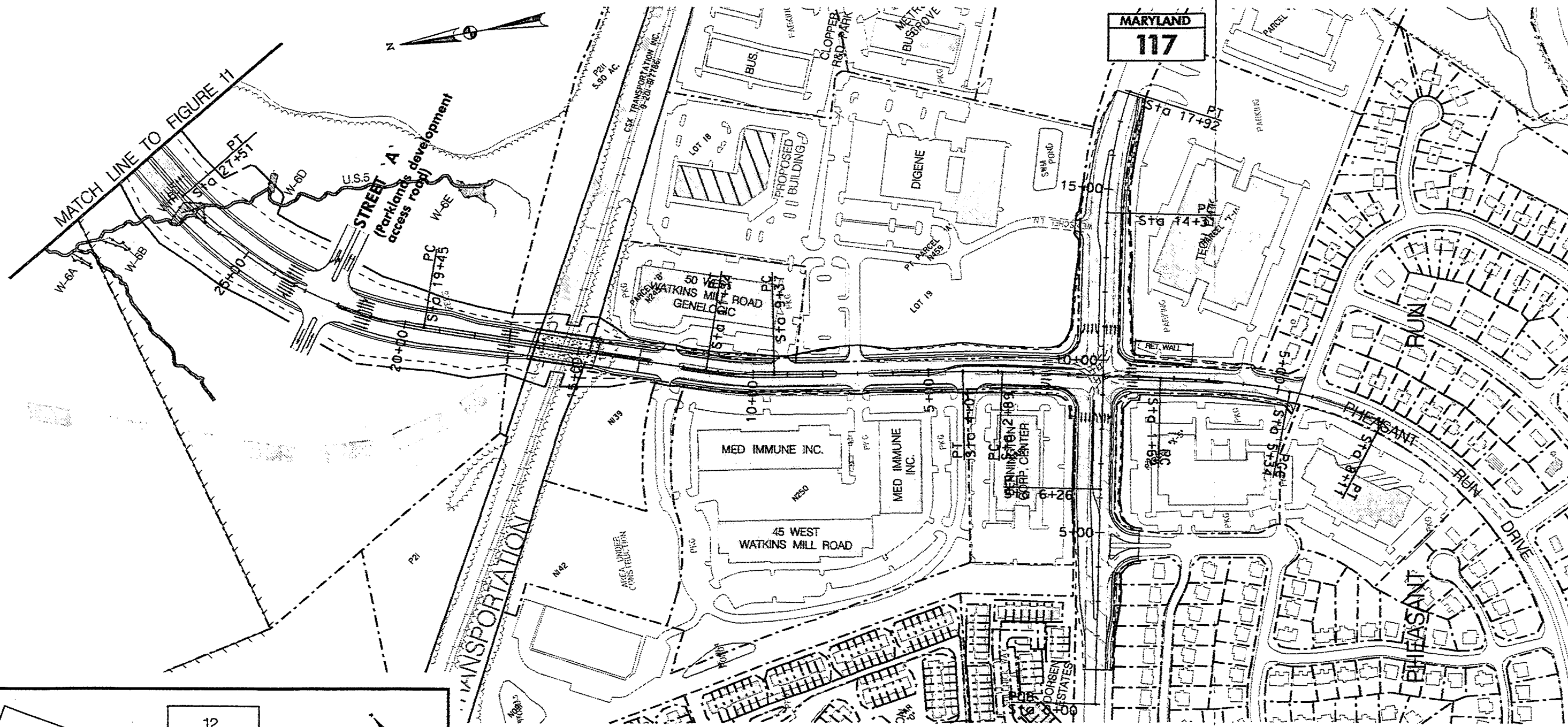
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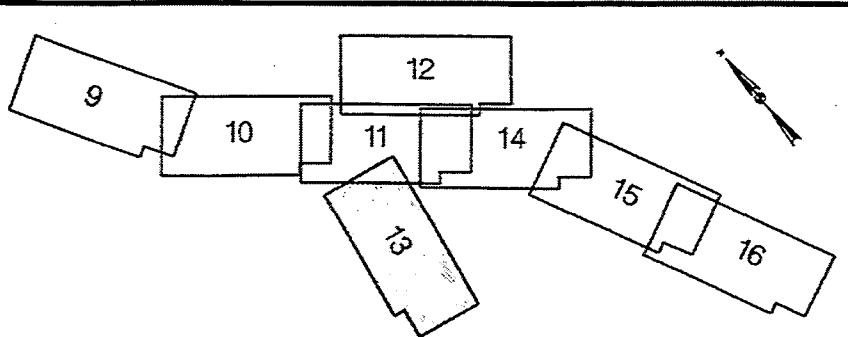
PLAN SHEET KEYMAP

STATE OF MARYLAND		
DEPARTMENT OF TRANSPORTATION STATE HIGHWAY ADMINISTRATION		
I-270 AT WATKINS MILL ROAD EXTENDED		
SELECTED ALTERNATE FULL DIAMOND INTERCHANGE WATKINS MILL ROAD STA. 47+00 TO STA. 64+02		
DATE NOV., 2001	SCALE : 1" = 300'	FIGURE 12

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MARYLAND
117



PLAN SHEET KEYMAP

STATE OF MARYLAND		
DEPARTMENT OF TRANSPORTATION STATE HIGHWAY ADMINISTRATION		
I-270 AT WATKINS MILL ROAD EXTENDED		
SELECTED ALTERNATE FULL DIAMOND INTERCHANGE WATKINS MILL ROAD STA. 0+00 TO STA. 29+00		
DATE SEPT., 2001	SCALE : 1" = 300'	FIGURE 13

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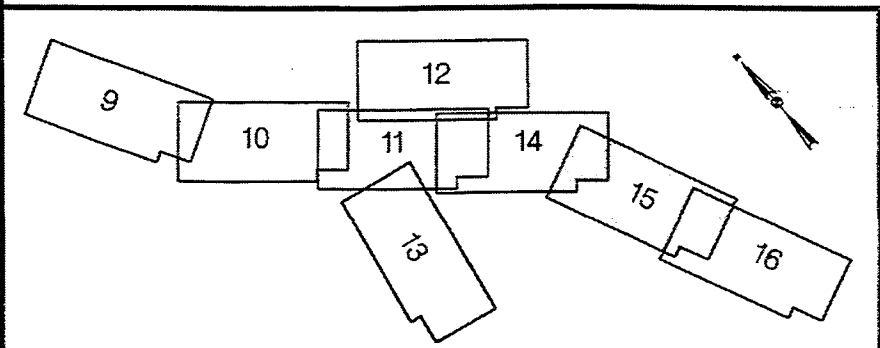
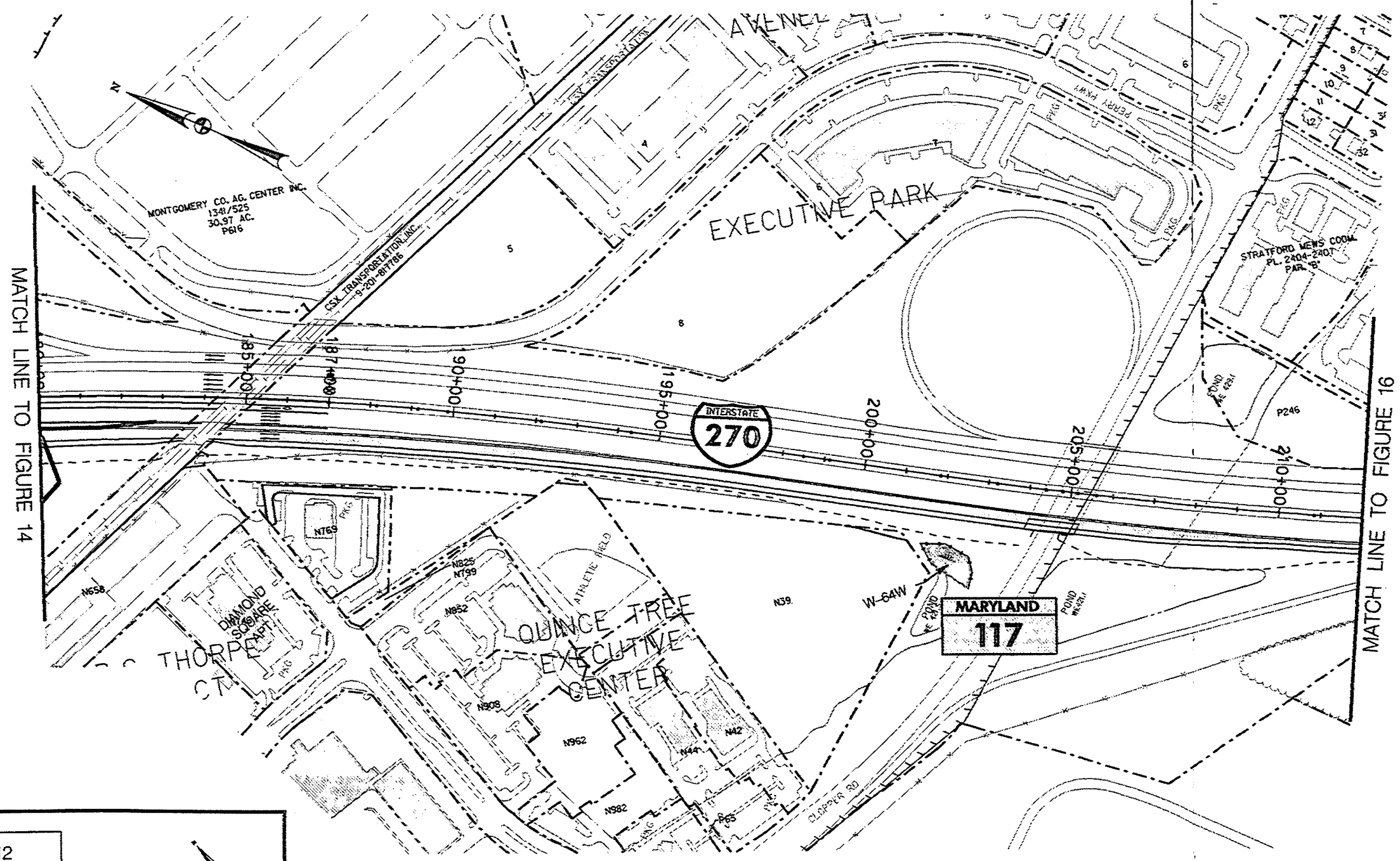


STATE OF MARYLAND
DEPARTMENT OF TRANSPORTATION
STATE HIGHWAY ADMINISTRATION
I-270 AT WATKINS MILL ROAD EXTENDED
SELECTED ALTERNATE
FULL DIAMOND INTERCHANGE
I-270 STA. 149+00 TO STA. 180+00

DATE
SEPT., 2001

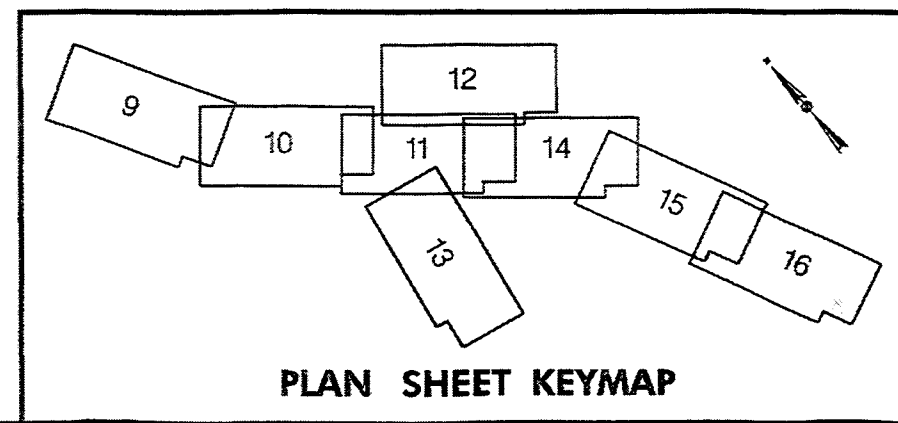
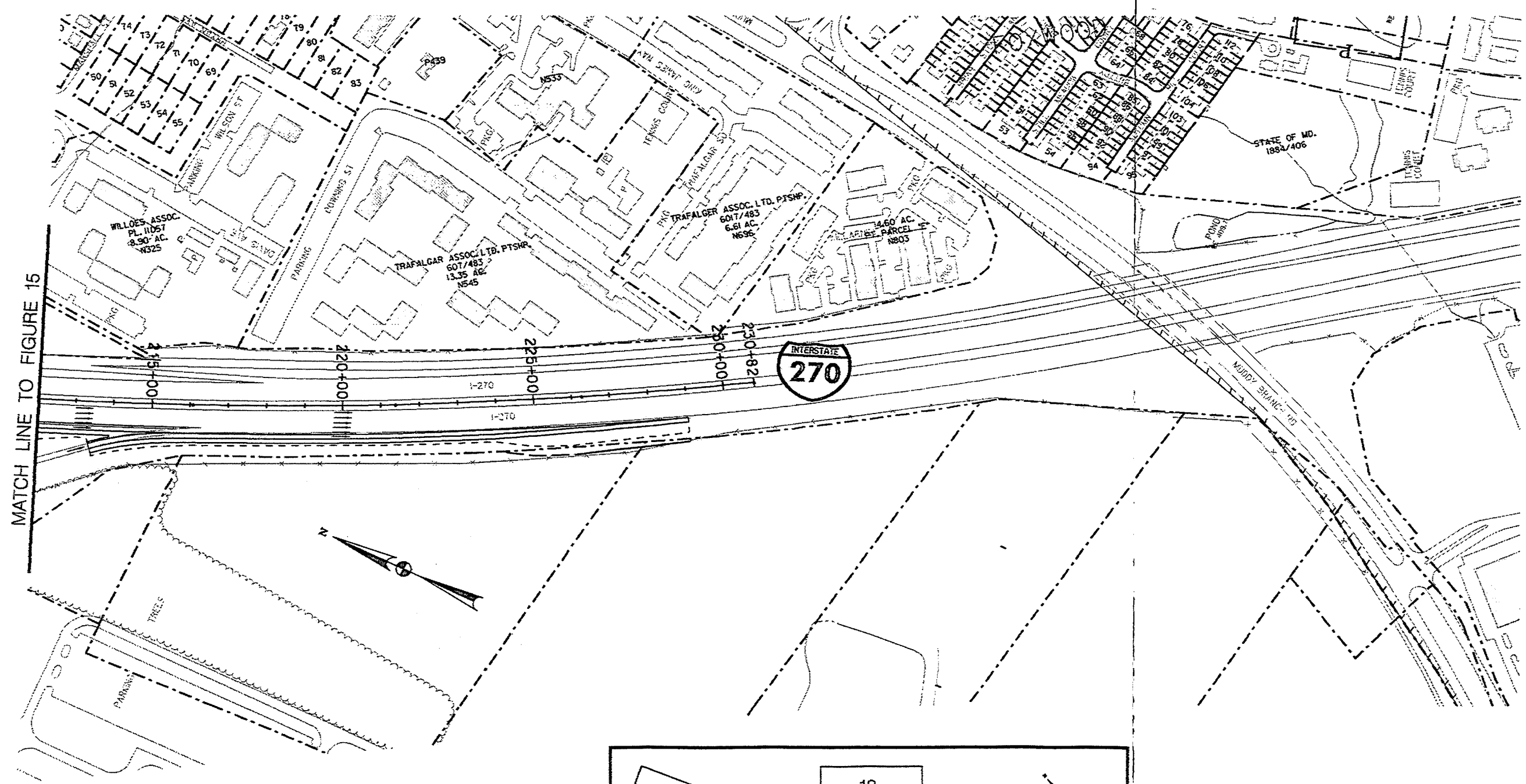
SCALE : 1" = 300'

FIGURE
14



PLAN SHEET KEYMAP

STATE OF MARYLAND		
DEPARTMENT OF TRANSPORTATION		
STATE HIGHWAY ADMINISTRATION		
I-270 AT WATKINS MILL ROAD EXTENDED		
SELECTED ALTERNATE		
FULL DIAMOND INTERCHANGE		
I-270 STA. 180+00 TO STA. 212+00		
DATE	SCALE : 1" = 300'	FIGURE
SEPT., 2001		15



PLAN SHEET KEYMAP

STATE OF MARYLAND		
DEPARTMENT OF TRANSPORTATION		
STATE HIGHWAY ADMINISTRATION		
I-270 AT WATKINS MILL ROAD EXTENDED		
SELECTED ALTERNATE		
FULL DIAMOND INTERCHANGE		
I-270 STA. 212+00 TO STA. 229+00		
DATE	SCALE : 1" = 300'	FIGURE
SEPT., 2001		16

355 (Figure 8). The Watkins Mill Road extension between MD 117 and MD 355, but not the bridge over I-270, would likely be constructed by others in conjunction with the planned development of the area. These Watkins Mill Road extensions would tie into the proposed interchange on the east and west sides of I-270. The extension of Watkins Mill Road between MD 117 and MD 355 was previously considered an integral part of all of the build alternates as presented in the Environmental Assessment for this project and is included in the assessment of impacts and cost of the Selected Alternate as presented in this document.

Alternate 3 Revised would use braided ramps in the southwest quadrant of the interchange because of inadequate weaving distance along southbound I-270.

Alternate 3 Revised would have the maximum extent of traffic operational benefits of all the build alternates. Alternate 3 Revised would have no residential or business/commercial displacements. It would affect a lower number of properties and would have lower right-of-way impacts than some of the other build alternates. Also, Alternate 3 Revised would have lower 100-year floodplain and wetland impacts than some of the other build alternates. Alternate 3 Revised is the least environmentally damaging practicable alternate that meets the project purpose and need. Alternate 3 Revised is located entirely within Montgomery County's priority funding area (Figure 23).

As part of the project planning process, staged construction of Alternate 3 Revised has been under consideration, realizing that Watkins Mill Road Extended, the bridge over I-270 and the C-D lanes may be built by others or by SHA in other projects. Conceivably, for budgetary purposes, a temporary partial interchange could be constructed prior to completing the full interchange.

The typical section for Watkins Mill Road Extended with the Selected Alternate (Alternate 3 Revised) includes 11-foot wide through lanes with a five-foot wide striped bicycle lane within the roadway. Beyond the curb, an eight-foot wide bicycle/pedestrian trail will be included on one side of the roadway, and a five-foot wide sidewalk will be provided on the other. Watkins Mill Road is functionally classified as a collector road. Including bicycle lanes and a bicycle/pedestrian trail as described above is recommended practice for this roadway classification in Montgomery County. The segments of Watkins Mill Road Extended outside of the proposed interchange area between MD 117 and MD 355 are proposed to be constructed by developers. Coordination is ongoing between SHA, the City of Gaithersburg planning staff and the developer to implement developer-constructed portions of Watkins Mill Road in a manner consistent with both the SHA Selected Alternate and the City of Gaithersburg guidelines for pedestrian/bicycle facilities.

The Parklands is a proposed transit-oriented development to be located in the southwest quadrant of proposed interchange. The developer of the Parklands is committed to constructing a direct access roadway from Watkins Mill Road, opposite the southbound I-270 exit ramp, into future parking lots/garages to support the existing MARC and future Corridor Cities Transitway stations. This access serves the same function as Access Options B and C, which were presented in the Environmental Assessment. Access Option B was dropped following the Public Hearing based on strong opposition from the West Watkins Mill Road business community, which objected to property and parking impacts that would have resulted. Separate from this project, the City of Gaithersburg is planning to implement a bicycle/pedestrian trail along the Access Option B alignment to connect from West Watkins Mill Road to the Metropolitan Grove MARC Station.

Measures to promote safe bicycle and pedestrian crossings at proposed Watkins Mill Road crossings of I-270 ramps, MD 355 and MD 117, including appropriate sidewalk connections, will be developed during the final design stage in accordance with current criteria and ADA standards.

4. Environmental Consequences of the Selected Alternate

a. Social/Economic

1) Displacements and Relocations

The Selected Alternate would not result in any business or residential displacements.

2) Right-of-Way Requirements

The Selected Alternate requires the acquisition of right-of-way from residential, commercial and park properties as summarized in Table 6 below.

TABLE 6
RIGHT-OF-WAY REQUIRED

LAND USE	NO. OF PROPERTIES AFFECTED	ACREAGE
Residential	12	3.9
Business/Commercial	24	58.2
Parkland	2*	5.45
TOTAL	38	67.55

*The Selected Alternate would impact only one park, Seneca Creek State Park, which is traversed by I-270. The Selected Alternate would impact Seneca Creek State Park on both the east side and west side of I-270.

3) Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations issued on February 11, 1994, requires federal agencies "to identify and address as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low income populations..." Minority is defined as "individual(s) who are members of the following population groups: American Indian or Alaskan Native, Asian or Pacific Islander, Black, not of Hispanic origin, or Hispanic." Also, low income populations should be identified as the median income below the Department of Health and Human Services poverty guidelines. These populations are to be provided access to public information and an opportunity to participate in matters relating to the environment.

The purpose of environmental justice is to identify and address "disproportionately high and adverse impacts" on minority populations and low income populations resulting from a project and to provide the opportunity for these populations to be involved in the public participation process.

The potential social impacts relating to low income and minority populations for the Selected Alternate in terms of direct effects from land acquisition or displacement are minimal. The Selected Alternate would not result in any business or residential displacements. Also, the Selected Alternate is located on land that is largely vacant and undeveloped, and therefore would result in minimal residential and business impacts.

An indirect effect of the Selected Alternate would be in the form of changes in accessibility and traffic patterns. Traffic volumes for Watkins Mill Road east of MD 355 are projected to increase over time, regardless of construction of the interchange. This portion of Watkins Mill Road is a county arterial which serves Montgomery Village, a community with a substantial minority presence. The Montgomery Village community is represented on the Focus Group, which consists of approximately ten members of business and community representatives in the project area. The Montgomery Village Foundation represents the Montgomery Village community. SHA has met with the Montgomery Village Foundation to discuss traffic issues on the following dates: February 6, March 27, April 5 and June 19, 2001 (See Appendix for minutes of these meetings). The increase in projected volumes for Watkins Mill Road east of MD 355 reflects primarily additional route choice within Montgomery Village itself. Residents who now use MD 124 to access I-270 and points west would be able to use Watkins Mill Road for the same purpose. Congestion levels would be reduced under the Selected Alternate at various existing intersections serving Montgomery Village. Traffic calming measures are under

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consideration by the City of Gaithersburg and Montgomery County Department of Public Works and Transportation to mitigate the adverse effects of increased traffic volumes in the community and promote safety and pedestrian accessibility (Section III.A.3). Such measures would serve the purposes of maintaining posted speeds through the neighborhood and school crossing areas and discouraging cut-through traffic on residential streets.

Another indirect effect of the Selected Alternate is the support of economic development areas and improved accessibility to those areas. Under the Selected Alternate, the number of signalized intersection through which I-270 traffic oriented to and from the proposed development areas would need to travel would be reduced, as would travel distances and times. Also, there would be reduced interaction between traffic to and from the local communities and traffic to and from the proposed development areas. With the proposed development planned adjacent to I-270, a new access point would substantially limit the need for development-oriented traffic to use the existing facilities such as MD 355, MD 117, and MD 124. This in turn, would free up capacity on these routes for the local communities. The improved accessibility to the proposed development areas helps ensure that the economic development benefits will be evenly distributed to surrounding communities, interstate travelers, and transit users through improved ability to get to jobs.

Based on this information there would not be disproportionately high and adverse impacts on minority or low-income populations with the Selected Alternate.

4) Title VI Statement

It is the policy of the Maryland State Highway Administration to ensure compliance with the provisions of Title VI of the Civil Rights Act of 1964, and related civil rights laws and regulations which prohibit discrimination on the grounds of race, color, sex, national origin, age, religion, physical or mental handicap or sexual orientation in all State Highway Administration program projects funded in whole or in part by the Federal Highway Administration. The State Highway Administration will not discriminate in highway planning, highway design, highway construction, the acquisition of right-of-way, or the provision of relocation advisory assistance. This policy has been incorporated into all levels of the State Highway Administration's highway planning process in order that proper consideration may be given to the social, economic, and environmental effects of all highway projects. Alleged discriminatory actions should be addressed to the Office of Equal Opportunity Section of the Maryland SHA, 707 North Calvert Street, Baltimore, MD 21202 for investigation.

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5) Community Disruption

Since I-270 is an existing interstate facility, proposed improvements incorporated in the Selected Alternate that would widen the footprint of I-270 would not disrupt community cohesion or impact access to community facilities and services, nor produce any adverse changes in social interaction. No new divisions of neighborhoods would occur. The extension of Watkins Mill Road from MD 117 to MD 355 including improvements to existing intersections and an interchange of Watkins Mill Road and I-270 are features of the Selected Alternate that would have an effect on the neighborhoods and communities. However, these effects would still be minimal since the area that would be traversed by the interchange and new roadway extension is largely vacant and undeveloped at the present time. This is particularly evident on the west side of I-270. The vacant parcel on the east side of I-270 is slated for development with up to 600,000 square feet of office/research space. On the west side of I-270 up to 1.7 million square feet of office/research space plus 1,500 residential units are planned.

East of MD 355, traffic forecasts indicate that Watkins Mill Road would experience an increase in average daily traffic volume in the design year 2020 for the Selected Alternate as compared to the No Build Alternate. Recognizing that this increased volume may create a disruption to the Montgomery Village community, the Montgomery County Department of Public Works and Transportation and the City of Gaithersburg are investigating the implementation of one or more of the traffic calming measures outlined in Section III.A.3.

6) Effects on Parks and Recreation Facilities

The Selected Alternate would require 5.45 acres of right-of-way from a publicly owned public park located in the immediate project area. The park that would be affected is Seneca Creek State Park, a Maryland Department of Natural Resources facility, which is traversed by I-270. Seneca Creek State Park extends from the Potomac River to MD 355, a distance of approximately 15 miles and encompasses over 6,200 acres. Seneca Creek State Park is comprised of multiple parcels of land. Two parcels adjacent to I-270 were acquired with funds from the Land and Water Conservation Fund. The impacted area is contained within these parcels that are adjacent to I-270. Other parcels were acquired using Program Open Space (POS) funds.

The Selected Alternate would require right-of-way from Seneca Creek State Park in the following amounts: 4.32 acres (east side of I-270) and 1.13 acres (west side of I-270). The proposed right-of-way is required to accommodate the C-D roadway footprint on both sides of I-270, as well as the possible expansion of the existing open water impoundment on the east side

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of I-270, which is within park boundaries and believed to currently provide stormwater quantity and/or quality management.

Also, the Selected Alternate would require relocating a set of wooden steps and a small portion of a hiking trail that are associated with Seneca Creek State Park and located within the existing SHA right-of-way for I-270. This is the result of extending the pier for widening southbound I-270 structure over Great Seneca Creek.

In accordance with the Department of Transportation Act, 49 U.S.C. 303 (c), a Section 4(f) Evaluation of this project's use of land from Seneca Creek State Park is presented in Section IV. The U.S. Department of the Interior (DOI) has concurred that there is no prudent and feasible avoidance alternative to Section 4(f) impacts to Seneca Creek State Park, which consist of the use of 5.45 acres of parkland. The exact amount, shape and location of the impacted area are substantially dependent on stormwater management design, which will be determined during final design following detailed hydrologic and hydraulic studies. The use of Land and Water Conservation funding or POS funding directs the DOI to assure that replacement lands of equal value, location and usefulness are provided as conditions to approvals of land conversion. Therefore, replacement land will be required since it has been determined that park impacts are unavoidable.

Coordination is on-going between SHA, Maryland Department of Natural Resources (DNR) and park officials regarding impacts to Seneca Creek State Park and mitigation thereof. SHA met with the Seneca Creek State Park jurisdictional officer in March, 2001. Subsequent to that meeting, it was determined through further coordination with DNR that the jurisdictional officer would not prefer to annex wetlands adjacent to proposed development as preliminary mitigation for proposed impacts. It was further agreed that coordination with DNR would continue through final design to determine suitable park replacement. (Section VI.A. Correspondence - Agency Coordination and Section VII. Appendices). Mitigation will include complete acre per acre replacement of all impacted park area.

7) Accessibility to Existing Services and Facilities

The Selected Alternate would improve overall access and mobility in the project area.

Access to existing community services and facilities would be impacted in the vicinity of the intersection of MD 117 and West Watkins Mill Road as a result of improvements to accommodate left turn movements requiring median construction. The new median construction would create a right-in/right-out situation at the entrance on the west side of MD 117, north of the intersection, which provides access to the Pheasant Run community and the industrial-

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research-office development (Figure 13). Since left-turn movements to this entrance would be prohibited, traffic making a left-turn to access these sites would be required to use an alternate access point, utilizing Pheasant Run Drive, which would require approximately 1,200 feet of additional travel to enter the Pheasant Run area.

To accommodate bicyclists, the typical section for Watkins Mill Road Extended includes a five-foot wide striped bicycle lane within the roadway. Beyond the curb, an eight-foot wide bicycle/pedestrian trail will be included on one side of the roadway, and a five-foot wide sidewalk will be provided on the other. Measures to promote safe bicycle and pedestrian crossings at proposed Watkins Mill Road crossings of I-270 ramps, MD 355 and MD 117, including appropriate sidewalk connections, will be developed during the final design stage in accordance with current criteria and ADA standards.

8) Regional and Local Economic Impacts

The I-270 corridor is a vital, growing extension of the Washington Metropolitan regional economy. The interstate continues to be a focal point of major commercial development.

The Selected Alternate would provide improved access and mobility in the area. It is envisioned that projected development as identified in the 1997 adopted City of Gaithersburg Master Plan will be associated with large corporate companies who are seeking high visibility sites which are accessible from I-270. The City of Gaithersburg has designated several parcels in northern Gaithersburg for economic development, where both employment growth and residential growth are planned to occur. The Selected Alternate proposes a full movement interchange and would fully address the growth needs of the city and county, having a positive effect on regional business activities.

Several development plans have been awaiting a determination of master plan improvements to the transportation network. Planned developments would accommodate 2.3 million square feet of new office/research space development and 2.3 million square feet of office/research space re-development. The Selected Alternate would provide improved levels of access and mobility to serve planned economic development in designated growth areas.

The Selected Alternate would not result in any business displacements.

The Selected Alternate would require a total of 58.2 acres of right-of-way acquisition from 24 local businesses. Relocation of parking to accommodate the proposed right-of-way requirements may be required at three of the area businesses. One of the businesses, Gaithersburg North Research and Development Center, is located along the east side of I-270 on

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Professional Drive. The other two businesses are located adjacent to Watkins Mill Road. They are: King Used Cars, located in the southeast quadrant of the intersection of MD 355 and Watkins Mill Road, and the business west of Genellogic, located between the CSX rail lines and MD 117 on the south side of West Watkins Mill Road. The number of parking spaces that would be impacted at each of the businesses would not be a significant percentage of the total number of parking spaces to put the business out of operation. Coordination is on-going with the business owners to locate replacement parking on site at each business.

b. Land Use and Growth Management

The 1997 City of Gaithersburg Master Plan and the 1990 Amended Gaithersburg Vicinity Master Plan recognize the need for the transportation network to accommodate planned future development. Both master plans recommend the extension of Watkins Mill Road between MD 117 and MD 355. The City of Gaithersburg Master Plan also recommends an interchange at I-270 and Watkins Mill Road Extended. Future land use and development densities planned in designated growth areas in northern Gaithersburg are based on the provision of these transportation linkages. The Selected Alternate, therefore, would not alter the ultimate intensity or pattern of land use development and re-development envisioned in these Master Plans.

The Selected Alternate is consistent with the local master plans since it proposes the extension of Watkins Mill Road between MD 117 and MD 355 (included in the Gaithersburg Vicinity Master Plan and the City of Gaithersburg Master Plan) and an interchange at Watkins Mill Road Extended and I-270 (included in the City of Gaithersburg Master Plan).

The Selected Alternate facilitates new access to designated growth areas and it is not expected that it would place additional development pressure on any low growth areas in the general vicinity, nor cause or encourage land uses that are not compatible with area master plans.

The project is located in a Montgomery County Priority Funding Area (PFA). The Maryland Department of Planning has evaluated the County's PFA designation and found it meets the criteria provided in the Smart Growth legislation (see Section VI. Correspondence, pages VI D-6 and 29). The Selected Alternate would significantly improve accessibility to the PFA's in northern Gaithersburg where development/redevelopment is planned. Provision of the transportation facilities to support growth in PFA's is consistent with the intent of the Maryland Economic Growth, Resource Protection, and Planning Act of 1992.

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c. Cultural Resources

Concurrence in a no effect determination to significant cultural resources including historic standing structures and archeological sites was received on October 16, 2000, from the Maryland Historical Trust (see Section V. Correspondence). Concurrence in a no effect determination was received because there are no significant historic standing structures or archeological resources in the project area.

d. Natural Environment

1) Topography, Geology and Soils

a) Topography and Geology

The Selected Alternate would change the overall existing topographic conditions within the Watkins Mill Road Extended project area. None of the grades of the Selected Alternate would exceed 6.0 percent, however, cutting and filling would be involved. The Selected Alternate would involve a maximum cut of 42 feet. Although the depth to bedrock within the study area is generally between two and nine feet, deep cutting and grading will not impact the underlying geology of the study area. The maximum fill associated with the Selected Alternate would be 44 feet.

b) Soils

The Selected Alternate would result in the disturbance of soils, including erosion and increased runoff, due to construction activities and loss of vegetation in the area. Areas with steep slopes would be modified by cut and fill activities, and soil profiles would change within the construction zones. Urban land soils (disturbed) would become more common throughout the study area, due to an increase in pavement and impervious surfaces.

The following matrix presents the mapped soil types for that portion of the study area that would be affected by the construction of the proposed Watkins Mill Road Extension and the I-270 interchange, and the reported erosion hazard associated with each of these soil types.

<u>Soil Series</u>	<u>K - Value*</u>	<u>Depth to Bedrock (in.)</u>
Gaila silt loam, 3-8% slopes (1C)	0.37	>60
Glenelg silt loam, 3-8% slopes (2B)	0.49	>60
Baile silt loam, 0-3% slopes (6A)	0.43	>60
Brinklow-Blocktown channery silt-loam, 15-25% slopes (16D)	0.24	25-30 (soft); >35 (hard phyllite)
Occoquan loam, 3-8% slopes (17B)	0.37	40 to 60
Occoquan loam, 8-15% slopes (17C)	0.37	40 to 60
Hatboro silt loam, 0-3% slopes (54A)	0.49	>60
Blocktown channery silt loam, 15-25% slopes (116D)	0.24	10 to 20

* K-value is a measure of the soil's erodibility based on a scale of 0.05 to 0.69. A K-value greater than 0.35 indicates that a severe potential for erosion exists for the corresponding soil series. For each soil series the maximum K-value for the profile was reported.

Source: USDA Soil Survey for Montgomery County, Maryland, 1995.

A majority of the soils in the study area occur on moderate and steep slopes and have a severe erosion hazard classification. Measures to protect soils from erosion would be implemented in accordance with an approved Erosion and Sediment Control Plan prepared in accordance with the 1991 Maryland Standards and Specifications for Soil Erosion and Sediment Control. Control measures would include: utilizing vegetation to stabilize sediment, reducing the amount of time and the area of a surface exposed to erosion; and utilizing appropriately sized sediment traps and sediment basins. Additional protection of surface water quality from impacts due to soil erosion are required for highway construction projects in Maryland due to the designation of construction contractors as co-permittees on the National Pollutant Discharge Elimination System (NPDES) Permit that is issued under Maryland's General Permit for construction activities, and implementation of a regular inspection program for construction site sediment control devices that includes penalties for inadequate maintenance.

Review of the Soil Survey of Montgomery County, Maryland (USDA, 1995) indicates that soils of statewide and local importance are not found in the area, but prime farmland soils, including the Gaila and Glenelg soil series, are found in a farm field and a forested area located west of I-270 and east of the Baltimore and Ohio rail line. However, these areas are zoned for residential and commercial development; thus, a Farmland Conversion Impact Rating Form AD 1006 was not completed for this project and the project is not subject to the Farmland Protection Policy Act. Therefore, prime farmland soils would not be impacted as a result of the Selected Alternate.

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2) Water Resources

a) Surface Water

The project area is located within the Great Seneca Creek watershed. Water resources within the project area include: Great Seneca Creek which flows through the western portion of the project area, one unnamed tributary to Great Seneca Creek which flows through the project area in a southeast to northwest direction parallel to I-270, one intermittent stream which flows in a west to east direction toward the unnamed tributary to Great Seneca Creek previously described, and Long Draught Branch which flows through the southern portion of the project area.

The Selected Alternate would not impact Long Draught Branch, but would impact the other three water resources described above. The stream impacts would occur as a result of bridging, relocation and culverts. Table 7 summarizes the stream impacts that would result from the Selected Alternate.

TABLE 7
SELECTED ALTERNATE STREAM IMPACTS
(LINEAR FEET)

Stream	Bridge	Culvert	Relocation	Total
Great Seneca Creek	125	0	0	125
Great Seneca Creek Tributary	490	420	175	1,085
Intermittent Tributary of Great Seneca Creek Tributary	0	520	0	520

A stream resource area that is particularly vulnerable, due to its location, lies just to the north of the proposed Watkins Mill Road Extended crossing of I-270. The Great Seneca Creek tributary in this area has already been substantially altered by the construction of I-270 and the installation of water and sewer lines. The stream flows roughly parallel to I-270 in this area, and has been channelized along the toe of slope of the highway for approximately 300 feet. A 48" water line and 18" sewer line are located in the stream valley, and also are oriented in a parallel direction. The Selected Alternate employs a 675 feet $\pm$ long by 18 feet $\pm$ (average height) retaining wall in this area to avoid impacting the stream and utilities at this location.

There are a variety of stream channel types that would be impacted by the Selected Alternate as a result of grading near streams and constructing roadway fill slopes that would require relocation and culverting of streams as indicated above, and these stream types will exhibit varied responses to disturbance. The geomorphology of the Great Seneca Creek tributary was investigated using the techniques outlined in Applied River Morphology (Rosgen 1996). A

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Level II geomorphic assessment was conducted through 2,942 feet of this tributary. The Level II assessment provides sufficient information to determine the stream type in the Rosgen Classification System. Stream type can then be utilized to assess the condition of the stream and provide insights into the past and future evolutionary progression of the stream channel. The stream baseline information collected for the area described above has been used to develop the preliminary proposed stream mitigation concepts discussed in Section III.B.4.d.5.c.

For the Selected Alternate, highway runoff is a potential source of pollutants to surface water resources. The long-term effects on water quality from the Selected Alternate would be related to the increase in impervious area created, and the potential changes to stream channel dimensions, pattern and profile that would accompany stream relocations, culvert and bridge construction. Changes to stream channel dimensions, pattern and profile result in long-term changes in water quality by changing natural sediment transport and biologic function. The Selected Alternate would require only one stream relocation: 175 linear feet of the Great Seneca tributary, west of the proposed ramp from southbound I-270 to Watkins Mill Road Extended. Impacts to stream channels that would result from bridge and culvert construction required for the Selected Alternate are summarized in Table 7. Preliminary proposed stream mitigation concepts are outlined in Section III.B.4.d.5.c.

The Great Seneca Creek watershed consists of approximately 35 square miles of land with approximately 21 percent impervious land cover. The construction of Watkins Mill Road Extended and the associated interchange with I-270 would increase impervious area within the watershed by less than one percent. Additionally, the construction of stormwater management facilities designed to control post-construction stormwater runoff to pre-developed (pervious site) conditions would minimize the potential long-term effects on water quality associated with the impervious area. Current stormwater management regulations require both stormwater quality and quantity control measures. Stormwater management facilities that would be considered for implementation include infiltration devices, bioretention areas, retention ponds, extended detention ponds, vegetated swales and natural depressions.

All stream waters in the study area are designated Use 1-P by the Maryland Department of the Environment (MDE). Therefore, in-stream construction will be prohibited from March 1st to June 15th, inclusive. A Waterway Construction Permit will be required from the MDE, Water Management Administration.

Best Management Practices (BMP's), to control stormwater runoff, and sediment and erosion control measures would be applied to protect stream quality. BMP's which would be considered for use include extended detention, infiltration, ponds and grassed swales. If necessary, any increased runoff to the streams caused by the increase in impervious area due to additional pavement would be addressed with quantity control stormwater management.

The increase in runoff of pollutants such as soils, nutrients, organics, heavy metals, lead, petroleum, and other highway salts resulting from the increase in traffic would be addressed with quality control stormwater management. The increase in impervious surface area resulting from the proposed improvements will produce a proportionate increase in the amount of roadway runoff carrying vehicle generated pollutants (i.e., oil, coolants, braking lining, rubber, etc.). Infiltration of stormwater runoff would be investigated as a means to provide quality control by filtering the runoff through the soil.

Water quality indices (e.g., parameters that quantify sediment, nutrients, bacteria, oxygen demand, etc.) for all streams affected should remain in the permissible range. The use of BMP's to provide sound stormwater management would be implemented where any disturbance could affect water quality in the corridor.

Stormwater runoff for the project will be managed in accordance with the MDE's "Stormwater Management Guidelines for State and Federal Projects". These regulations will require stormwater management practices in the following order of preference:

- On-site infiltration;
- Flow attenuation by open vegetated swales and natural depressions;
- Stormwater retention structures; and
- Stormwater detention structures.

It has been demonstrated that these measures can substantially reduce pollutant loads and control runoff. Stormwater management areas will be identified during the final design phase.

To minimize water quality impacts, final design for the proposed improvements will include plans for grading, sediment and erosion control, and stormwater management, in accordance with State and Federal laws and regulations. Final plans require review and approval by the MDE, Water Management Administration. Sediment and erosion control measures will be designed and implemented in accordance with the "1991 Maryland Standards and Specifications for Soil Erosion and Sediment Control". Typical temporary sediment control measures which are installed in a project of this type include straw bale structures, slope silt fence, sediment traps, rip-rap linings, fiberglass erosion stops, dikes and swales, soil stabilization matting and stabilized construction entrances. The area disturbed by the construction will be held to a minimum and revegetated promptly after grading to minimize the potential for erosion and sedimentation.

Potential changes to stream channel dimensions, pattern and profile caused by stream relocations, culverts and bridges would be addressed in the design process to minimize the

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potential for long-term channel instability. (See Section III.B.4.d.5.c. for a discussion of preliminary proposed stream mitigation concepts.)

b) Groundwater Effects

The Selected Alternate has the potential to affect groundwater in proportion to the conversion of existing pervious land cover (forests, open fields) to impervious surface created by the construction. Highway construction influences aquifer recharge areas by:

- direct conversion of permeable surfaces to impermeable surfaces,
- increased stormwater runoff rates, and
- potential introduction of highway derived stormwater contaminants to aquifers.

It is not anticipated that the Selected Alternate would result in long-term adverse effects on groundwater. Although the conversion to impermeable surfaces reduces groundwater recharge, the amount of impervious surface represented by the Selected Alternate is insignificant in terms of the total recharge area of the underlying aquifers. Additionally, existing stormwater management regulations require the control of post-construction stormwater to pre-construction pervious conditions through the use of Best Management Practices that address both the quantity and quality. Finally, the depth to the shallowest aquifer, based upon well records for the project area generally exceeds one hundred feet in depth, and the project is located outside the sole source aquifer area.

3) Floodplains

The construction of the Selected Alternate would require the crossing and encroachment of the Great Seneca Creek tributary 100-year floodplain in various locations on the west side of I-270 and would require widening the existing I-270 bridge over Great Seneca Creek as well as, encroachment of the 100-year floodplain. The Selected Alternate would impact 4.5 acres of the 100-year floodplain of Great Seneca Creek and 1.9 acres of the 100-year floodplain of the Great Seneca Creek tributary.

Pursuant to the Flood Hazard Management Act of 1976 and in accordance with the Executive Order 11988, Floodplain Management, federal funds may not be used to support incompatible floodplain development unless no practical alternative exists.

The estimated impacts to 100-year floodplains are associated with bridge, culvert, stormwater management and retaining wall construction and stream relocation activities. Because of the need to extend the existing crossing of Great Seneca Creek and to cross the unnamed tributary of Great Seneca Creek with the interchange ramps, impacts to the 100-year

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floodplains cannot be avoided. Long-term impacts to 100-year floodplains are not expected to occur, because final designs will be based on detailed hydraulic studies to verify FEMA's 100-year floodplain elevations and determine appropriate culvert sizes. By incorporating these results into the final design plans, SHA would be able to avoid long-term floodplain impacts and maintain existing floodplain functions.

The estimated floodplain impacts are based on preliminary structure lengths and estimates of the required stormwater management. Final determination of structure type and length as well as, detailed stormwater management studies will be made during the design phase of the project.

The State Highway Administration will prepare a detailed hydrologic and hydraulic study for the Selected Alternate during final design to identify the existing 100-year storm discharge and floodplain. Stormwater management will be provided and all hydraulic structures will be designed to accommodate the 100-year storm without causing substantial impact.

The use of standard hydraulic design techniques for all waterway openings which limit upstream flood level increases and approximate existing downstream flow rates will be utilized where feasible.

Use of state-of-the-art sediment and erosion control techniques and stormwater management controls will ensure that none of the encroachments would result in risks or impacts to the beneficial floodplain values or provide direct or indirect support to further development within the floodplain.

In accordance with the requirements of FHPM 6-7-3-2, which is a FHWA guideline for ensuring compliance with Executive Order No. 11988, the impacts of each encroachment have been evaluated to determine if it is a significant encroachment. A significant encroachment would involve one of the following:

- a significant potential for interruption or termination of a transportation facility which is needed for emergency vehicles or provides a community's only evacuation route,
- a significant risk, or
- a significant adverse impact on natural and beneficial floodplain values.

Preliminary analyses indicate that no significant floodplain impacts or encroachments are expected to occur as a result of the Selected Alternate.

4) Hazardous Materials/Waste Sites

Visual inspection of the project area and a review of federal and state hazardous waste site databases reveals that underground storage tank facilities, nuclear materials handlers, Resource Conservation and Recovery Act generator facilities, and a Comprehensive Environmental Response, Compensation, and Liability Act, No Further Remediation Planned facility are located on-site and adjoining the study area. However, none of these facilities are located within the alignment of the Selected Alternate, and all of these facilities are currently in compliance with state and federal regulations. Therefore, these facilities do not pose an environmental threat to the project at this time.

5) Terrestrial and Aquatic Habitat

a) Terrestrial

The forested land within the study area provides habitat for deer, rabbits, fox, various species of birds, and other native wildlife. New road construction, increased noise, and clearing of forests for the Selected Alternate would reduce the quality of these habitats. Species diversity and populations would be impacted proportionally to the amount of habitat that is disturbed by the proposed construction. The Selected Alternate would impact a total of 30.9 acres of woodland.

In addition to direct loss of habitats and deterioration of remaining habitats, the Selected Alternate would increase fragmentation of ecosystems within the study area. Fragmentation disrupts ecosystem structure and function and would be detrimental to those species requiring a large home range. Loss of habitat for forest interior dwelling species (FIDS) due to fragmentation is of special concern in Maryland. The Selected Alternate will reduce habitat for forest interior dwelling birds from 80 acres to 53 acres. FIDS habitat is usually greater than 100 acres and consists of the interior core of a forest. The impact of 27 acres of forest interior occurs at the edge of the forest stand leaving the largest portion of FIDS habitat intact.

The Selected Alternate would result in the separation of a large portion of upland forest from the nearby floodplain and water resources. In addition to habitat fragmentation, the Selected Alternate would create barriers to wildlife migration both within and between habitat types. Barriers to wildlife movement would be undesirable if areas used for forage are separated from nesting or roosting areas. The Selected Alternate includes two bridges with bottom openings of sufficient size to allow for wildlife movement. It is also important to note that much of the undeveloped land in the project area is already planned for economic development. The City of Gaithersburg has designated several parcels in northern Gaithersburg where both employment growth and residential growth are planned to occur (Figure 3).

The Maryland Forest Conservation Act (FCA) enacted in 1991 mandates that one acre of reforestation must be provided for each acre cleared. The Selected Alternate would comply with regulations set forth in the FCA.

Coordination with the USFWS and the MDDNR indicates that no state or federally listed rare, threatened, or endangered species are known to exist within the study area and therefore, would not be affected by the Selected Alternate. However, correspondence with MDDNR indicated that two species of state concern (which is a lower and unregulated ranking than Rare) could potentially occur in the vicinity of the study area; American bittern (*Botaurus lentiginosus*), and Opelousus smartweed (*Polygonum opelousanum*). The American bittern primarily inhabits areas of open marshland and lakes that do not occur within the study area. The American bittern may transiently use the wetlands and water within the study area. Opelousus smartweed is a variation of Water-pepper (*P. hydropiperoides*) that occurs in shallow water and wet soils along coastal plains (Brown, 1984). Neither of these species was located during the field work that was conducted as part of the current study. The study area is located in the Piedmont physiographic province and has no open marshlands or lakes. Detailed surveys were not conducted for either of these species due to a lack of suitable habitat.

b) Aquatic (Wetlands)

A wetland delineation, conducted in February 1998 and April 1999, identified ten wetlands within the study area. Wetlands were identified based on the Corps of Engineers (COE) *Wetland Delineation Manual* (Environmental Laboratory, 1987). This method includes the identification of three wetland parameters, hydrophytic vegetation, hydric soils, and hydrology. Wetland classifications were based on the USFWS Cowardin system (Cowardin, et al., 1979). The Jurisdictional Determination (JD) of the wetland boundaries was completed in two separate field reviews. The first wetland JD was conducted for the I-270/US 15 multi-modal corridor study in Dec./Nov. 1998 and covered an approximate 150-foot wide zone from the edge of pavement on either side of I-270 (see minutes letter dated 10/10/98 in Section VI.A. - Agency Coordination). The second wetland JD was conducted in July, 1999 for both the proposed Transitway (from Shady Grove Metro Station to MD 75 Extended) and proposed interchange at Watkins Mill Road Extended. This wetland JD covered the remainder of the project area not included in the first wetland JD (see minutes in letter dated 07/09/99 in Section VI.A.).

Prior to conducting a field investigation, possible wetlands were identified using preliminary wetland mapping completed during previous planning studies for the project, National Wetland Inventory (NWI) maps prepared by the U.S. Fish and Wildlife Service (US FWS), Soil Survey maps for Montgomery County, and topographic maps.

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A summary of the wetlands, in the vicinity of the Selected Alternate, listing the locations, quality and classifications of the wetlands is shown in Table 8 followed by a discussion of the impacted wetlands. The impacted wetlands are shown on Figures 10, 11, 13 and 14.

In accordance with Executive Order 11990, Protection of Wetlands, the Selected Alternate has been designed with the intention of avoiding or minimizing harm to these wetlands. Approximately 0.76 acre from five wetlands will be unavoidably impacted by the Selected Alternate. As discussed below, due to the geometric requirements of the Selected Alternate and the shape and location of the wetlands in relation to existing I-270 and the proposed improvements, total avoidance of wetlands was not feasible or reasonable. A Section 404 Permit (U.S. Army Corps of Engineers) and Nontidal Wetlands Permit (MD Department of the Environment) will be required for all wetland impacts. Federal, state and local regulations require the mitigation and/or compensation for the unavoidable loss of wetland habitats. Advanced mitigation for 0.32 acre of wetland impact has occurred for the I-270/WMRE project on the Hawkins mitigation site located on the east side of I-270 north of the project area (see letter dated November 4, 1999 in Section VI.A.). This site was originally set aside by Montgomery County as a one acre site for the construction of Watkins Mill Road Extended; however, 0.68 acre was transferred for the Father Hurley Boulevard project, as approved by MDE in November, 1999. Additional acreage for wetland replacement is available from an approved mitigation site plan on the Linthicum site located at 13100 West Old Baltimore Road, approximately 5,000 feet west of MD 355 and 1,750 feet east of I-270. The Linthicum site has a Categorical Exclusion for the creation of approximately 20 acres of nontidal wetlands, as well as, stream restoration for mitigation of impacts associated with the proposed widening of Riffle Ford Road and improvements to I-270 interchanges (see letter dated February 21, 2001 in Section VI.A.).

TABLE 8
WETLANDS SUMMARY

WETLAND SYSTEM	LOCATION	SITE DESCRIPTION	COWARDIN CLASSIFICATION	DOMINANT VEGETATION
W-6A	1,200 feet $\pm$ west of I-270 and 2,100 feet $\pm$ south of Great Seneca Creek, along a Great Seneca Creek tributary (U.S. 5)	Drainage Swale	Palustrine emergent, with a seasonally flooded/saturated water regime (PEM1C/E)	Skunk Cabbage, Christmas Fern, Stout Woodreed
W-6B	1,300 feet $\pm$ west of I-270 and 2,200 feet $\pm$ south of Great Seneca Creek, along a Great Seneca Creek tributary (U.S. 5)	Bank of unnamed stream	Palustrine scrub-shrub/emergent, with a seasonally saturated water regime (PSS/PEM1C)	Skunk Cabbage, Winterberry, Black Gum, Highbush Blueberry
W-6C	1,400 feet $\pm$ west of I-270 and 2,300 feet $\pm$ south of Great Seneca Creek, along a Great Seneca Creek tributary (U.S. 5)	Forested floodplain	Palustrine forested, with a seasonally flooded/saturated water regime (PFO1C/E)	Sycamore, Red Maple, Winterberry, Spicebush, Stout Woodreed
W-6D	1,500 feet $\pm$ west of I-270 and 2,500 feet $\pm$ south of Great Seneca Creek, along a Great Seneca Creek Tributary (U.S. 5)	Forested floodplain	Palustrine emergent, with a seasonally flooded water regime (PEM2C)	(Site visit occurred prior to the start of the growing season)

TABLE 8
WETLANDS SUMMARY (continued)

WETLAND SYSTEM	LOCATION	SITE DESCRIPTION	COWARDIN CLASSIFICATION	DOMINANT VEGETATION
W-6E	2,000 feet ± west of I-270 and 2,900 feet ± south of Great Seneca Creek, along a Great Seneca Creek tributary (U.S. 5)	Headwaters of unnamed stream	Palustrine scrub-shrub, with a seasonally flooded/saturated water regime (PSS1C/E)	Winterberry, Spicebush, Stout Woodreed, Cinnamon Fern, Skunk Cabbage
Wetland 102	300 feet ± west of I-270 and 1,400 feet ± south of Great Seneca Creek, along a Great Seneca Creek tributary (U.S. 5)	Forested floodplain	Palustrine forested, with a temporary/seasonally saturated water regime (PFO1A/E)	Red Maple, Tulip Poplar, Spicebush, New York Fern, Jewelweed, Ground Ivy, Poison Ivy
			and palustrine forested/scrub-shrub, with a saturated/seasonally saturated water regime (PFO/PSS1B/E)	Red Maple, Tulip Poplar, Black Gum, Spicebush, Winterberry, Black Willow, White Grass, Grass Species, False Nettle

TABLE 8
WETLANDS SUMMARY (continued)

WETLAND SYSTEM	LOCATION	SITE DESCRIPTION	COWARDIN CLASSIFICATION	DOMINANT VEGETATION
W-B63W	400 feet ± west of I-270 and 2,400 feet ± south of Great Seneca Creek, along the Great Seneca Creek tributary (U.S. 4 and U.S. 8)	Stream and associated floodplain.	Palustrine forested, with a seasonally flooded/saturated water regime (PFO1C/E)	Red Maple, Green Ash, Spicebush, Skunk Cabbage, False Nettle, Fowl Manna Grass
			Palustrine forested, with a temporary/seasonally flooded water regime (PFO1A/C)	Red Maple, Black Gum, Spicebush, Skunk Cabbage, Ground Ivy
			Palustrine emergent, with a seasonally flooded water regime (PEM2C)	Skunk Cabbage
			Palustrine emergent, with a seasonally saturated water regime (PEM1/2E)	Skunk Cabbage, Arrow-leaved Tearthumb, Big-leaved Arrowhead, Halbred-leaved Tearthumb, False Nettle
W-C63E	East side of I-270, 2,800 feet ± north of MD 124	Outfall of stormwater management pond and stream	Palustrine emergent, with a temporary water regime (PEM1A)	Blue Vervain, Arrow-leaf Tearthumb, Soft Rush, Nutsedge, Jewelweed.

TABLE 8
WETLANDS SUMMARY (continued)

WETLAND SYSTEM	LOCATION	SITE DESCRIPTION	COWARDIN CLASSIFICATION	DOMINANT VEGETATION
W-62A	West side of I-270, 500 feet ± north of Game Preserve Road	Floodplain	Palustrine emergent, with a temporarily flooded water regime (PEM1A)	Common Reed, Arrow-leaf Tearthumb, Soft Rush, Rice-Cut Grass, Barnyard Grass
			Palustrine, forested, broad-leaved deciduous, with a temporarily flooded water regime (PF01A)	Green Ash, Red Maple, Box Elder, Winterberry, Arrow-Wood, Skunk Cabbage, White Grass
W-62C	East side of I-270, 300 feet ± north of Game Preserve Road	Floodplain	Palustrine emergent, with a temporarily flooded water regime (PEM1A)	Soft Rush, White Grass

Note: A wetland functional assessment was conducted for the wetlands associated with the Great Seneca Creek tributary, west of I-270 and north of MD Route 124 (see minutes dated 11/23/99 in Section V.A.). The wetlands within this system have generally similar vegetation composition and hydrogeomorphic setting; therefore, all forested wetlands were assessed as one forested wetland and all emergent wetlands were assessed as one emergent wetland system.

The US Army Corps of Engineers (COE) recommended that the wetland systems within the study area be assessed using the *Evaluation for Planned Wetlands* (EPW) and *The Highway Methodology Workbook Supplement – Wetland Functions and Values: A Descriptive Approach*, also known as the New England Approach. Both methodologies show that the principle or primary functions and values of the wetlands include: sediment stabilization, water quality, wildlife habitat, fish and shellfish habitat, and are valued for their Uniqueness and Heritage. Other functions and values exist to a lesser degree.

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Wetland W-B63W

Wetland W-B63W is located along the Great Seneca Creek tributary from Wetland 102 to the intersection of the Great Seneca Creek tributary and I-270 (Figures 11 and 14). This wetland includes several palustrine forested and palustrine emergent wetlands with the largest being approximately 1.80 acres in size.

A palustrine forested wetland with a seasonally flooded/saturated water regime (PFO1C/E) is located south of the proposed Watkins Mill Road extension. Hydrologic indicators include inundation, saturated soils, drainage patterns, and oxidized rhizospheres. The wetland is dominated by red maple (*Acer rubrum*), green ash (*Fraxinus pennsylvanica*), spicebush (*Lindera benzoin*), skunk cabbage (*Symplocarpus foetidus*), false nettle (*Boehmeria cylindrica*), and fowl manna grass (*Glyceria striata*). Soils exhibited low chroma colors and mottles.

Two intermittent streams drain into the Great Seneca Creek tributary south of the forested wetland. A palustrine-forested wetland with a temporarily/seasonally flooded water regime (PFO1A/C) is located in the Great Seneca Creek tributary floodplain, approximately 100 feet south of these intermittent streams. Hydrologic indicators include drainage swales and oxidized rhizospheres. The wetland is dominated by red maple (*Acer rubrum*), black gum (*Nyssa sylvatica*), spicebush (*Lindera benzoin*), skunk cabbage (*Symplocarpus foetidus*), and gill-over-the-ground (*Glechoma herderacea*). Soils exhibited low chroma colors, gleying, and mottles.

A palustrine emergent wetland with a seasonally flooded water regime (PEM2C) is located along a narrow drainage swale, which parallels the west side of the Great Seneca Creek tributary and flows into the tributary approximately 150 feet south of the forested wetland. The wetland receives hydrology from groundwater seeps and overbank flooding. Additionally, drainage patterns were observed. Dominant vegetation includes skunk cabbage (*Symplocarpus foetidus*). Soils exhibited low chroma colors, gleying, and mottles.

A palustrine emergent wetland with a seasonally saturated water regime (PEM1/2E) is located on the east side of the Great Seneca Creek tributary, north of its intersection with I-270. Hydrologic indicators include saturated soils, water marks and drainage patterns. Dominant vegetation includes skunk cabbage (*Symplocarpus foetidus*), arrow-leaved tearthumb (*Polygonum sagittatum*), big-leaved arrowhead (*Sagittaria latifolia*), half-bred-leaved tearthumb (*Polygonum perfoliatum*), and false nettle (*Boehmeria cylindrica*). Soils exhibited low chroma colors, mottles, and gleying.

The Selected Alternate would impact 0.23 acre of W-B63W as a result of roadway and associated grading in the vicinity of the Watkins Mill Road Extended bridge over I-270.

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Avoidance of W-B63W could be accomplished by lengthening the proposed Watkins Mill Road structure over I-270 by approximately 50 feet, at a cost of \$1,130,000. This option is not considered feasible due to excessive cost.

The impact to W-B63W could be minimized to a 0.15 acre impact by reducing the slope ratio of the supporting slope for the abutment. It is proposed to be a 2:1 slope and could possibly be steepened to 1:1 with the use of geotextiles to mechanically stabilize the embankment. The feasibility of steepening the supporting slope and using geotextiles will be determined during the final design stage of the project.

Wetland W-C63E

Wetland W-C63E is located east of I-270 and south of Game Preserve Road, on the southwestern boundary of the IBM property (Figure 11). The wetland was classified as palustrine emergent with a temporarily flooded water regime (PEM1A). The wetland receives hydrology from the stormwater management pond and a rising groundwater table. Dominant vegetation includes blue vervain (*Verbena hastata*), arrow-leaf tearthumb (*Polygonum sagittatum*), soft rush (*Juncus effusus*), nutsedge (*Cyperus esculentus*), and jewelweed (*Impatiens capensis*). Soils were identified in the Soil Survey for Montgomery County (USDA, 1995) as Baile silt loam, which is listed as hydric (State of Maryland, 1990). Wetland W-C63E is 0.02 acre in size.

The Selected Alternate would impact 0.02 acre of W-C63E as a result of roadway and associated grading near the diverge point of the ramp from northbound I-270 to Watkins Mill Road Extended.

Avoidance of W-C63E could be accomplished with the construction of a 100 feet $\pm$ long by 30 feet $\pm$ wide cantilevered structure at a cost of approximately \$500,000. This option is not considered feasible due to excessive cost.

The impact to W-C63E could be minimized to 0.01 acre by reducing the overall width of the proposed typical section for I-270. This could be accomplished by incorporating a painted collector distributor road in the northbound direction in lieu of the proposed barrier separated facility. The painted collector-distributor road would cost less than the barrier separated facility but would not be as safe. This option is not considered reasonable since safety would be jeopardized while only a 0.01 acre reduction in wetland impact would be realized.

Wetland W-62A

Wetland W-62A is located west of I-270 and north of Great Seneca Creek, outside of the study area (Figure 10). A portion of the wetland was classified as palustrine emergent with a

temporarily flooded water regime (PEM1A). This wetland was dominated by common reed (*Phragmites australis*), arrow-leaf tearthumb (*Polygonum sagittatum*), soft rush (*Juncus effusus*), rice-cut grass (*Leersia oryzoides*), and barnyard grass (*Echinochloa muricata*). A portion of the wetland was classified as palustrine, forested, broad-leaved deciduous, with a temporarily flooded water regime (PFO1A). This wetland is dominated by green ash (*Fraxinus pennsylvanica*), red maple (*Acer rubrum*), box elder (*Acer negundo*), winterberry (*Ilex verticillata*), arrow-wood (*Viburnum dentatum*), skunk cabbage (*Symplocarpus feotidus*), and whitegrass (*Leersia virginica*). Soils were identified in the Soil Survey for Montgomery County (USDA, 1995) as Hatboro silt loam, which is listed as hydric (State of Maryland, 1990). The delineated portion of Wetland W-62A is 0.92 acre in size. The total size of the wetland is not known since it extends westward beyond the limits of our study.

The Selected Alternate would impact 0.08 acre of W-62A as a result of roadway and associated grading on the southbound side of I-270, north of Great Seneca Creek.

Avoidance of W-62A could be accomplished by the construction of an 800 feet $\pm$ long by 19.5 feet $\pm$ (average height) retaining wall at a cost of approximately \$1,030,000. This option is not considered feasible due to the excessive cost.

The impact to W-62A could be minimized to a 0.04 acre impact by reducing the slope ratio of the roadway supporting slope. It is proposed to be a 2:1 slope and could possibly be steepened to 1:1 with the use of geotextiles to mechanically stabilize the embankment. The feasibility of this option will be determined during the final design stage of the project.

Wetland W-62C

Wetland W-62C is located east of I-270 and north of Great Seneca Creek, outside of the study area (Figure 10). The wetland was classified as palustrine emergent with a temporarily flooded water regime (PEM1A). The wetland is dominated by soft rush (*Juncus effusus*) and whitegrass (*Leersia virginica*). Soils were identified in the Soil Survey for Montgomery County (USDA, 1995) as Hatboro silt loam, which is listed as hydric (State of Maryland, 1990). The delineated portion of Wetland W-62C is 0.45 acre in size. The total size of this wetland is not known since it extends eastward beyond the limits of our study.

The Selected Alternate would impact 0.34 acre of W-62C as a result of roadway and associated grading on the northbound side of I-270, north of Great Seneca Creek.

Avoidance of W-62C could be accomplished by the construction of a 300 feet $\pm$ long by 45 feet $\pm$ wide cantilevered structure at a cost of \$2,200,000. This option is not considered feasible due to the excessive cost.

The impact to W-62C could be minimized to 0.27 acre by reducing the overall width of the proposed typical section for I-270. This could be accomplished by incorporating a painted collector-distributor road in the northbound direction in lieu of the proposed barrier separated facility. The painted collector-distributor road would cost less than the barrier separated facility but would not be as safe. This option is not considered reasonable since safety would be jeopardized while only a 0.07 acre reduction in wetland impact would be realized.

Wetland W-6C

Wetland W-6C is 0.09 acre in size and is located along the extension of Watkins Mill Road approximately 1,100 feet east of the CSX railroad tracks (Figure 13). Wetland 6-C is classified as a palustrine forested wetland with a seasonally flooded/saturated water regime (PF01C/E). The dominant vegetation in the canopy layer consists of *Platanus occidentalis* (sycamore) and *Acer Rubrum* (red Watkin maple). The shrub layer contains dominant vegetation that includes *Ilex verticillata* (winterberry) and *Lindera benzoin* (spicebush). The dominant vegetation in the herbaceous layer is *Cinna arundinacea* (stout woodreed). Soils in the wetland are mapped as Gaila silt loam, which is listed as highly erodible land by NRCS. An inclusion of Baile silt loam is also located within this area and is listed as hydric by NRCS.

The Selected Alternate would impact 0.09 acre of W-6C as a result of roadway and associated grading for Watkins Mill Road Extended.

Avoidance of W-6C could be accomplished by the construction of a 150 feet long by 90 feet wide bridge at a cost of \$2,000,000. This option is not considered feasible due to the excessive cost.

Due to the proximity of the wetland in relation to the extension of Watkins Mill Road, there is no practical minimization option. A bridge that is shorter in span length than the 150-foot bridge described under the Avoidance section above could minimize impacts, but would cost in excess of \$1 million and would not be practical given that the wetland is less than 0.1 acre in size. Since the entire wetland is under the proposed road bed, a shift in the alignment is the only possible minimization measure. However, there are four wetlands (W-6A, W-6B, W-6C and W-6D) somewhat evenly spaced, perpendicular to Watkins Mill Road, and shifting would only result in impacts to another wetland. It is not possible to shift enough to miss all four wetlands given the CSX railroad crossing and connecting to existing West Watkins Mill Road. In addition, this is the alignment as described in both the City of Gaithersburg Master Plan and the Gaithersburg Vicinity Master Plan .

c) Waters of the U.S.

The Selected Alternate would result in a total of 1,730 linear feet of impact to Waters of the U.S. as summarized below in Table 9. The impacted Waters of the U.S. are shown on Figures 11, 13 and 14.

TABLE 9
WATERS OF THE U.S. IMPACTS - SELECTED ALTERNATE

WATER RESOURCE	LOCATION	IMPACT
Great Seneca Creek	I-270 bridge over Great Seneca Creek	125 L.F. - bridge widening
U.S. 4	Ramp from SB I-270 to Watkins Mill Road Extended (WMRE)	175 L.F. - stream relocation
	Ramp from SB I-270 to WMRE	70 L.F. - new bridge crossing
	WMRE bridge over I-270	240 L.F. - new bridge crossing
	Existing culvert under I-270, 1,200 feet ± north of MD 124	20 L.F. - upstream existing culvert extension 160 L.F. - downstream existing culvert extension
U.S. 5	Ramp from SB I-270 to WMRE	130 L.F. - new culvert crossing
	WMRE, 1,100 feet ± east of CSX lines	390 L.F. - new culvert crossing
U.S. 6	Existing culvert under I-270, 900 feet ± south of WMRE	60 L.F. - upstream existing culvert extension 80 L.F. - downstream existing culvert extension
	Ramp from SB C-D road to MD 124	100 L.F. - new culvert crossing
U.S. 8	WMRE bridge over I-270	180 L.F. - new bridge crossing

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Preliminary proposed stream mitigation concepts have been developed as described below. These concepts are based on the Rosgen analysis completed during the detailed environmental analysis stage.

Conceptual Mitigation

Approximately 175 linear feet of a tributary to Great Seneca Creek will be relocated and restored to a stable condition as part of the mitigation requirements for this project (Figure 17). The relocation is necessary due to the extended meander that has been migrating towards the I-270 embankment, and the future placement of the exit ramp to Watkins Mill Road. Impacts have been significantly minimized with the proposed construction of a 25-foot high retaining wall to limit stream and floodplain impacts.

The proposed stream relocation will eliminate two actively eroding meanders with vertical outer streambanks of 3 - 6 feet in height. The reduction in stream length and the concurrent increase in stream slope will necessitate the use of boulder grade control structures throughout the relocated and restored stream reach. Boulder armoring will protect the outer meander with a floodplain bench created between the stream and the retaining wall to be constructed. Floodplain width, area and capacity will be maintained.

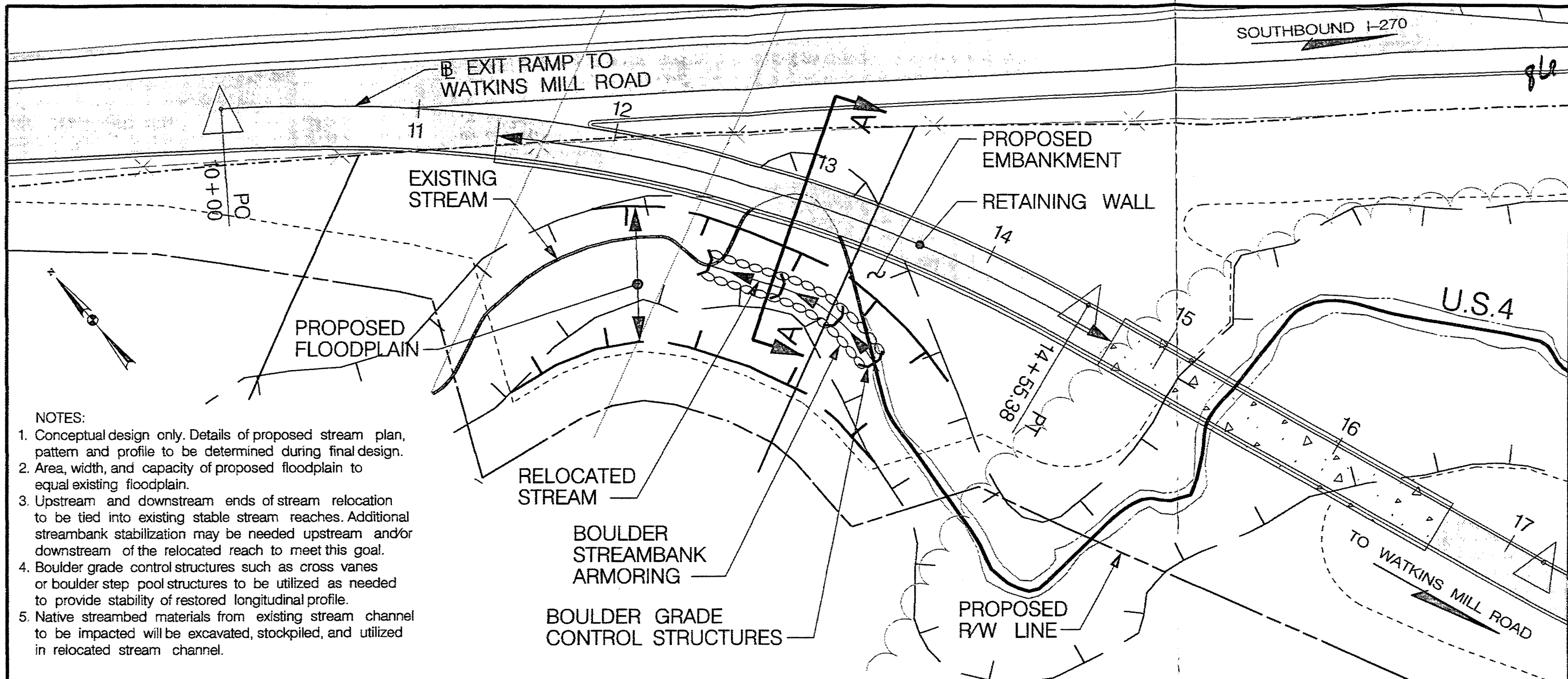
Extensive riparian plantings will be specified along the restored streambanks, in the new floodplain, and along the slope below the proposed retaining wall. A native seed mix held in place with natural erosion control fabric will provide soil stabilization. Due to the location of the relocated reach in a power line corridor, no trees will be specified. A self-sustaining shrub community with herbaceous components will be specified and installed to provide long-term vegetative stabilization.

The proposed stream relocation and restoration will be designed to connect upstream and downstream stable reaches with a stable restored channel using natural channel design principles. The existing unstable reach that is threatening the existing I-270 embankment will be eliminated, with a more stable overall stream system resulting.

e. Air Quality

A detailed air quality analysis of the No-build and Selected Alternate have been performed in accordance with the U.S. Environmental Protection Agency (US EPA), the Federal Highway Administration (FHWA), and the Maryland State Highway Administration (MD SHA) guidelines. The air quality analysis indicates that carbon monoxide (CO) impacts resulting from the implementation of the Selected Alternate would not result in a violation of the 1-hour or 8-hour State and National Ambient Air Quality Standards (S/NAAQS) in the analysis years 2010 or 2020 (Table 10).

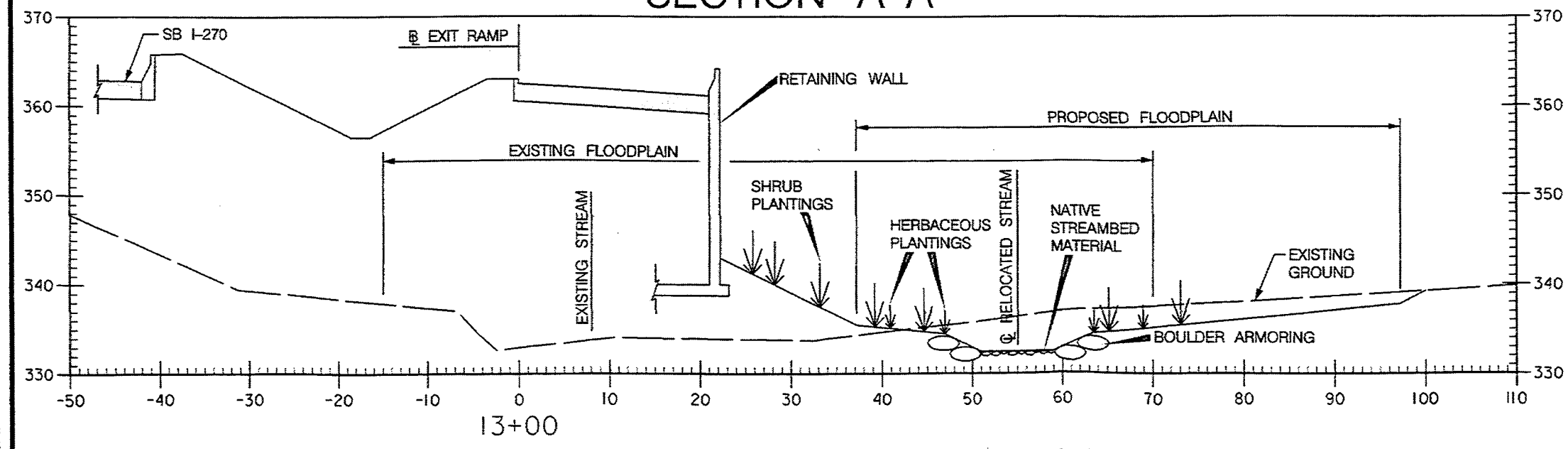
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NOTES:

1. Conceptual design only. Details of proposed stream plan, pattern and profile to be determined during final design.
2. Area, width, and capacity of proposed floodplain to equal existing floodplain.
3. Upstream and downstream ends of stream relocation to be tied into existing stable stream reaches. Additional streambank stabilization may be needed upstream and/or downstream of the relocated reach to meet this goal.
4. Boulder grade control structures such as cross vanes or boulder step pool structures to be utilized as needed to provide stability of restored longitudinal profile.
5. Native streambed materials from existing stream channel to be impacted will be excavated, stockpiled, and utilized in relocated stream channel.

SECTION A-A



NOTES (Cont.):

6. Streambanks to be stabilized with boulder armoring with interstitial plantings.
7. All newly created floodplain and embankment surfaces to be seeded with an appropriate native seed mix and covered with natural erosion control fabric.
8. Extensive riparian plantings to be utilized using appropriate native species to provide long-term stability and restore and improve ecological functions and values.

STATE OF MARYLAND		
DEPARTMENT OF TRANSPORTATION STATE HIGHWAY ADMINISTRATION		
I-270 AT WATKINS MILL ROAD EXTENDED		
SELECTED ALTERNATE STREAM RELOCATION AND ENHANCEMENT PRELIMINARY PLAN		
DATE SEPT., 2001	SCALE: 1" = 50'	FIGURE 17

The Watkins Mill Road Extended project is located in Montgomery County, Maryland, which is designated as serious non-attainment for ozone (O₃). Montgomery County is not designated as non-attainment for CO and particulate matter (PM₁₀). The proposed project is included in the FY 2001 - 2006 Transportation Improvement Plan (TIP) and the 2000 Washington Area Constrained Long Range Plan (CLRP). The TIP and CLRP have undergone conformity analysis and a new Mobile Emissions Budget has been established for the Washington, D.C.-Maryland-Virginia Nonattainment Area. Therefore, the Selected Alternate is in conformity with regional air quality plans.

TABLE 10
CO CONCENTRATION SUMMARY
FOR THE NO-BUILD AND SELECTED ALTERNATE
PARTS PER MILLION (PPM)

Receptor	2010		2020			
	Selected Alternate		No-Build		Selected Alternate	
	1-hr	8-hr	1-hr	8-hr	1-hr	8-hr
R-1	9.8	7.0	7.8	4.0	11.0	7.7
R-2	7.0	4.7	7.0	4.2	10.0	5.9
R-3	7.2	4.8	8.8	5.4	10.6	6.3
R-4	7.3	4.9	8.6	4.6	10.9	6.2
R-5	5.7	3.3	7.4	3.8	8.3	4.2
R-6	5.4	3.5	4.2	2.6	6.5	3.7
R-7	5.2	3.2	4.0	2.5	6.2	3.8
R-8	9.1	5.7	9.1	5.6	12.2	6.6
R-9	10.6	7.1	8.3	5.1	11.6	7.6
R-10	7.0	4.7	10.5	6.1	9.6	5.4
R-11	7.4	5.1	8.7	5.4	9.6	6.4

Note: 1-hour average CO concentrations include a 5.0-ppm background concentration. Worst case a.m. or p.m. is shown.

8-hour average concentrations include a 3.0-ppm background concentration.

The S/NAAQS for the 1-hour average is 35.0 ppm.

The S/NAAQS for the 8-hour average is 9.0 ppm.

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f. Noise Impacts

1) Noise Prediction Methodology

**a) Federal Highway Administration Standards/
SHA Guidelines**

The effects of noise from the proposed roadway extension and interchange are judged in accordance with the Federal Highway Administration as established by 23 Code of Federal Regulations (CFR) Part 772, *Procedures for Abatement of Highway Traffic Noise and Construction Noise*. According to the procedures described in 23CFR, Part 772, Table 11; noise impacts occur when predicted traffic noise levels for the design year approach or exceed the noise abatement criteria (NAC) prescribed for a particular land use category, or when the predicted noise levels are substantially higher than the existing ambient noise levels. The Md SHA and FHWA defines approach as 66 dBA and uses a 10 dBA increase to define a substantial increase. All locations within the study area are of land use category B, which has an exterior design noise level of 67 dBA.

For this analysis, the Watkins Mill Road and I-270 improvements are considered a Type I project because the proposed construction will alter the traffic patterns in the study area. The Type I study also requires that no build and all build alternates be evaluated for existing noise receptors 20 years into the future. Future noise levels are predicted for the design-year using an FHWA-approved noise prediction model.

The predicted noise levels are presented for the No Build Alternate and the Selected Alternate, both with and without barriers. Noise mitigation was only considered for noise sensitive areas that would be impacted by the Selected Alternate. Watkins Mill Road Extended will be constructed by Montgomery County and/or local developers. The interchange with I-270 will be designed and constructed using Federal and State funds.

The Maryland State Highway Administration's (SHA) policy is applicable to projects funded with Federal and/or State funds. Sound barriers are evaluated in two separate categories. The first category (Type I) is for the construction of new highways or through lane capacity additions to existing highways. The second category (Type II) is for existing highways not being expanded.

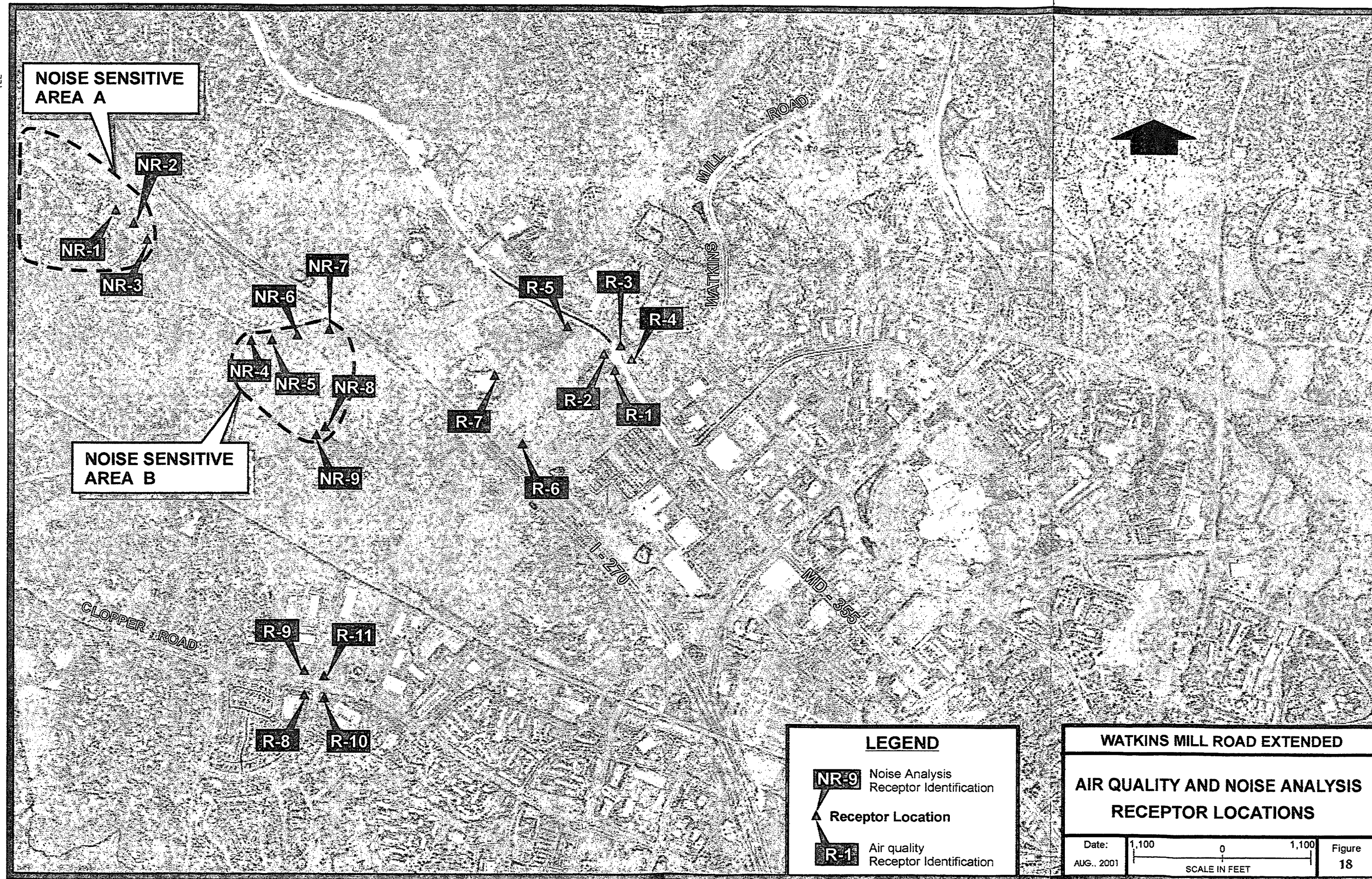


TABLE 11
FEDERAL HIGHWAY ADMINISTRATION (FHWA)
TITLE 23 OF THE CODE OF FEDERAL REGULATIONS, PART 772
NOISE ABATEMENT CRITERIA (NAC)

Activity Category	L _{eq} (1-hour) (dBA)	Description of Activity Category
A	57 Exterior	Lands on which serenity and quiet are of extraordinary significance and serve an important public need, and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B	67 Exterior	Picnic areas, recreation areas, playgrounds, active sports areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals.
C	72 Exterior	Developed lands, properties, or activities not included in Categories A or B.
D	--	Undeveloped land.
E	52 Interior	Residences, motels, hotels, public meeting rooms, schools, churches, libraries, hospitals, and auditoriums.

Noise is often described as unwanted sound. In this report, noise and sound will be used interchangeably. Sound is a result of rapid variations of sound pressure above and below atmospheric pressure. Sound pressures are described in terms of "sound pressure levels" and are called *decibels* and denoted as dB. When sound pressure levels are measured or estimated, a filter called the "A-Weighting Network" is used to reduce the magnitude of low and very high frequency sounds, much like a human ear does. Sound pressure levels are reported in terms of an A-weighted sound level and expressed in dBA. The A-weighted rating of noise sources corresponds to the human ear's reduced sensitivity to low-frequency sound and correlates well with human perceptions of the annoying aspects of noise, particularly from traffic noise sources.

Moving traffic produces sound levels that vary as vehicles approach and then pass by an observer. The easiest way to quantify the changing sound is to measure or calculate an *average*

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sound level over some period of time. This single number representation of a variable sound level is called the "*equivalent sound level* (L_{eq})" and contains the same amount of sound energy as the varying sound level measured over a specified time period. For this analysis, the hourly L_{eq} are reported.

Generally, the annoyance associated with noise varies with the magnitude of the noise level, the source of the noise, and the individual's attitude toward the noise and its source. Although the human ear is sensitive, people barely perceive noise level changes of 2-3 dB. People readily perceive a change of 5 dB, and a 10 dB increase in noise level is perceived as a doubling of sound loudness. The following sound level measurements provide context for the noise levels commonly reported in highway noise studies. A quiet rural night is approximately 35 dBA. A quiet suburban night is approximately 40 dBA. A noisy urban day is approximately 75 dBA. A gasoline-engine powered lawn mower at 100 feet is approximately 70 dBA, and a diesel truck at 50 feet is approximately 85 dBA.

Under the current SHA Noise Policy, several factors are evaluated to determine whether noise abatement is feasible and reasonable. These factors are listed below:

Feasibility

Sound barrier feasibility is defined as the engineering and acoustical ability to provide effective noise reduction. Sound barrier feasibility will be based upon the following:

- If noise levels cannot be reduced by at least 3 decibels at impacted receptors, a noise barrier will not be considered feasible. The noise reduction goal for receptors with the highest noise levels (first row receivers) is 7 - 10 decibels. If a noise reduction of 7 - 10 decibels cannot be achieved, the barrier will be considered not to be feasible.
- If the placement of a sound barrier will restrict pedestrian or vehicular access or would cause a safety problem, such as limiting sight distance or reduction of a vehicle recovery area, the barrier will not be considered feasible.
- If the construction of a sound barrier will result in significant utility impacts, the barrier will not be considered feasible. Significant utility adjustment can have a major impact on barrier design options and construction costs.
- If construction of a sound barrier will have an impact upon existing drainage, it could be considered not to be feasible. Drainage is an important element in the location and design of a sound barrier. The potential for impact to drainage

patterns and systems and flooding will be considered in the overall decision on whether construction is feasible and reasonable.

Only barriers that are determined to be feasible will be approved.

Reasonableness

Each individual impact area will also be evaluated to determine if construction of a sound barrier is reasonable. Reasonableness will be based upon the following:

- If 75% of the impacted residents do not approve the proposed sound barrier, the barrier could be considered not to be reasonable.
- If existing noise levels are expected to increase by 10 decibels or more, but will be less than 57 decibels, a sound barrier will be considered not to be reasonable.
- If a change over no-build levels of less than 3 decibels would result from a build condition, a sound barrier could be considered not to be reasonable. In the assessment of the no-build to build noise level change, consideration will be given to the cumulative effects of highway improvements made after the original highway construction. If the cumulative increase in design year build noise levels at noise sensitive receivers that existed when prior improvements were made is equal to or greater than 3 decibels, noise abatement could be considered reasonable.

If noise levels equal or exceed 72 decibels at impacted noise sensitive receivers, SHA will consider a sound barrier reasonable for any proposed highway expansion that will increase noise levels provided that other feasibility and reasonableness criteria are met.

- If the cost of a sound barrier will exceed \$50,000 per benefited residence, the barrier will be considered not to be reasonable. The cost/residence is determined by dividing the cost of a sound barrier by the total number of benefited residences. The total number of benefited residences will be the sum of the following:
 - a. The number of impacted residences that would receive a 3 decibel or greater noise reduction.

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- b. The number of non-impacted residences (noise levels below 66 dBA Leq) that would receive a 5 decibel or greater noise reduction.
 - c. The number of impacted and non-impacted non-residential noise sensitive receivers (schools, churches, etc.) that would benefit from a sound barrier.

SHA will look at both the cost/residence for individual noise sensitive areas and the average cost/residence for the entire project in determining reasonableness. Noise sensitive areas with a cost/residence of less than \$100,000 would be included in the project cost averaging. If the average cost/residence for the project is less than \$50,000, sound barriers will be considered reasonable.

- If a very tall sound barrier would have to be located close to the impacted receptors, and would have a negative visual impact, construction of the barrier could be considered not to be feasible. The relationship of the location of a sound barrier to the receptors to be protected will be considered in making a reasonableness determination.
- If the construction of a sound barrier will result in an impact to a Section 4(f) resource, it could be determined not to be reasonable. Section 4(f) resources include publicly owned recreation areas and parks, wildlife areas, conservation areas and historic sites that are either on or considered eligible for the National Register of Historic Places.

Reasonableness will consider the significance of impact and the feasibility of avoidance. A 4(f) document will be prepared as required by federal regulations and consultation and coordination with those responsible for the resource will be carried out and documented.

- The control of new development adjacent to state highways in high noise zones at the local level is critical to the overall abatement of highway noise. Sound barrier reasonableness will consider the local priority on approving new development adjacent to state highways in the determination of providing noise abatement for highway construction or reconstruction project.

**b) Noise Prediction/Barrier Analysis Methodology
Using the FHWA Noise Model**

A sound barrier analysis was performed following a multi-step, analytical approach to identify noise impacts and evaluate potential mitigation measures. This approach includes the

collection of field noise measurements, which are used to validate the noise impacts predicted by FHWA's Traffic Noise Model (TNM) Version 1.0b. The TNM model was developed by FHWA to assess highway traffic noise levels and mitigation for a specific site. It uses an experimentally and statistically determined reference sound level for each class of vehicle (e.g., automobiles, medium-duty trucks, heavy-duty trucks, buses, and motorcycles), and it incorporates input from traffic data (i.e., volume, truck percentages, speeds) and site characteristics including topography, buildings, and roadway configuration.

The analytical approach to sound barrier analysis is summarized in the following five steps.

Field Data Collection

Ambient noise levels in the study area are measured using the procedures identified in the most recent guidance available.¹ Noise measurement data are collected at receptor locations throughout the study area during a 24-hour period. The 24-hour record for each location is analyzed to identify the one-hour period with the highest noise levels. During the noise data collection, field technicians note non-traffic-related noise sources that could influence background noise levels, such as aircraft overflight or other community noise sources. One-hour classified vehicle counts are also obtained during noise measurement activities.

Model Validation

The TNM model is used to calculate traffic-related noise levels in the project area. The classified traffic count data collected in the field are used as model input for the initial model run. The model results are compared with the field noise measurements to determine whether the model realistically characterizes the acoustic environment within the study area. Model results within 3 dB of field measurements indicate that the model presents a reasonable representation of existing conditions. Differences greater than 3 dB indicate that the model inputs require re-evaluation, potential adjustment or require additional field noise measurements.

Impact Assessment

The validated model of the study area and peak traffic volumes are used to determine the sound levels at locations for each alternate approach or those that exceed the NAC. A Sound Barrier Feasibility Analysis is performed for locations where impacts are predicted.

¹ US Department of Transportation, Federal Highway Administration, *Measurement of Highway-Related Noise*, May 1996. Washington, DC.

Sound Barrier Feasibility Analysis

The TNM model is used to determine whether a sound barrier could be constructed in the study area to provide a 7 to 10 dB reduction for impacted residences. The analytical results are used to define the required location, length, and height of the sound barrier to achieve this noise reduction.

2) Noise Prediction Results

Existing noise levels and predicted noise levels for the year 2020 without barriers for the no build condition and the Selected Alternate are presented in Table 12. At noise sensitive areas (NSAs) impacted (66 dBA or greater) by traffic on Watkins Mills Road and I-270, a barrier analysis was conducted. Results of the barrier analysis, including feasibility and cost-effectiveness, are shown in Tables 13 and 14.

The highway currently identified as I-270 was originally constructed circa 1960 as a limited access highway with two lanes in each direction. A third lane was added in each direction in 1971 and the road was further widened to create four lanes in each direction in 1990. The residences and other facilities identified in the study area as noise-sensitive receptors were constructed over many years. The construction dates for these residences and facilities were compared to the dates of previous roadway improvements, and many of the construction dates associated with the receptors preceded certain I-270 improvements.

An analysis of the cumulative effects of highway noise was performed to determine whether the effects of these previous improvement projects would meet SHA's Policy Reasonableness Criterion for noise mitigation. The results of the cumulative effects noise analysis is incorporated into the discussion below.

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**TABLE 12
PREDICTED NOISE LEVELS (L_{EQ})**

Receptor	Existing Measured Ambient Noise Levels (dBA)	Predicted No-Build Noise Level (dBA)	Predicted Selected Alternate Noise Level (dBA)
NSA A – Gunners View			
1	- ^a	68	70
2	- ^a	67	69
3	60	66	68
NSA B – Caulfield			
4	- ^a	68	70
5	- ^a	68	70
6	65	67	69
7	68	75	74
8	- ^a	64	65
9	54	59	59

^a Receptor location added for analysis with no ambient measurement.

Note: Shaded areas represent noise levels that exceed the Noise Abatement Criteria.

Noise Sensitive Area A

Noise Sensitive Area A consists of receptors R1, R2, and R3 which represent 79 attached townhouses in the Gunners View Community, which is west of I-270 and adjacent to the north side of Seneca Creek State Park. The Selected Alternate 2020 noise levels range from 68 dBA to 70 dBA. Therefore, all receptors meet the “impacted” SHA criterion of 66 dBA and require that a barrier analysis be performed. From the TNM model, predicted noise levels associated with the no-build condition and the Selected Alternate indicate that traffic noise at some receptor locations will increase by 1 to 2 dB compared to the no build conditions. This predicted increase is primarily a result of the change in traffic speed and traffic volume. Under the no-build condition, traffic speed is reduced because of congestion. Under the Selected Alternate, free-flowing traffic conditions with higher speeds produce higher predicted noise levels as a result of the additional capacity provided.

The barrier evaluated to mitigate noise impacts at NSA A for the Selected Alternate would:

- Be constructed along the west side of I-270;
- Be approximately 2,305 feet long and extend north from the north side of Seneca Creek State Park;

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- Reduce noise levels approximately 10 to 11 dB at all 79 residences in the community;
 - Incur a total cost of \$683,300; and
 - Incur a cost per benefited residence of \$8,650.

As shown in Table 14, all of the receptors in NSA A have undergone a cumulative increase in noise levels of approximately 3 dBA or greater, which indicates that they meet SHA's reasonableness criteria. The barrier evaluated for NSA A is considered reasonable and feasible. Table 13 provides characteristics of the barrier evaluated for NSA A.

Noise Sensitive Area B

Noise Sensitive Area B consists of receptors R4, R5, R6, R7, R8, and R9, which represent six single-family residences in the Caulfield community, which is west of I-270 and adjacent to the south side of Seneca Creek State Park. The Selected Alternate 2020 noise levels range from 59 dBA to 74 dBA. Receptors R8 and R9 do not meet or exceed SHA's 66 dBA noise impact level for the No Build or the Build Alternates. Therefore, only four of the six receptors are impacted.

Mitigation of noise impacts in NSA B for the Selected Alternate would:

- Be constructed along the west side of I-270.
- Be approximately 2,150 feet long and extend from the proposed bridge carrying the southbound exit ramp over the Great Seneca Creek tributary to approximately 1,500 feet north of Game Preserve Road.
- Reduce noise levels by approximately 10 to 12 dBA at four receptors and 1 to 2 dBA at the remaining two residences.
- Incur a cost of \$765,200; and
- Incur a cost per benefited residence of \$191,300.

As shown in Table 14, the majority of receptors in NSA B have undergone a cumulative increase in noise levels of approximately 3 dBA or greater. However, as shown in Table 13, the barriers evaluated for NSA B did not satisfy the \$50,000 per residence cost criteria for the Selected Alternate. Therefore, mitigation is not considered reasonable at NSA B since barriers do not meet cost criteria.

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TABLE 13

**CHARACTERISTICS OF SOUND BARRIERS
ANALYZED WITH SELECTED ALTERNATE**

Location	Height (feet)	Length (feet)	Total Cost	Benefited Residences	Cost Per Residence	2020 Build Noise Level w/Barrier	Insertion Loss (dBA)
NSA A	6-26	2,305	\$683,300	79	\$8,650	58-60	10-11
NSA B	14-26	2,150	\$765,200	4	\$191,300	58-63	1-12

**TABLE 14
NOISE ANALYSIS SUMMARY**

Receptor	Estimated Date Built	Off-Peak Ambient Noise Level (dBA)	Model Validated Noise Level (dBA)	2020 Selected Alternate Noise Level (dBA)	Baseline Noise Level (dBA)	Change Over Baseline (dBA)	2020 No-Build Noise Level (dBA)	Change Over 2020 No-Build (dBA)	2020 Build Noise Level With Barrier (dBA)	Insertion Loss (dBA)
NSA A - GUNNERS VIEW										
1	1980	NA	63	70	66	4	68	2.0	60	10
2	1980	NA	63	69	65	4	67	2.0	58	11
3	1980	60	62	68	64	4	66	2.0	58	10
NSA B - CAULFIELD										
4	1978	NA	63	70	67	3	68	2.0	58	12
5	1976	NA	63	70	67	3	68	2.0	58	12
6	1964	65	62	69	64	5	67	2.0	59	10
7	1969	68	70	74	73	1	75	1.0	62	12
8	prior to 1980	NA	60	65	62	3	64	1.0	63	2
9	prior to 1980	54	55	59	57	2	59	1.0	58	1

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g. Secondary and Cumulative Effects

In compliance with the National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ) regulations (40 CFR 1508.25(c)), the following analysis examines the secondary and cumulative effects on the environment which may result from this project. The CEQ regulations and guidelines entitled "Considering Cumulative Effects Under the National Environmental Policy Act" define secondary and cumulative effects as follows:

Secondary (Indirect) Effects: "Effects which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." (40 CFR 1508.8(b))

Cumulative Impacts: "Impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." (40 CFR 1508.7)

This secondary and cumulative effects analysis (SCEA) was prepared to evaluate secondary effects and cumulative impacts associated with the improvements proposed by the I-270/Watkins Mill Road Extended project.

1) Scoping for the SCEA

a) Description of the Resources Addressed by the SCEA

An initial step in the SCEA process is to identify the resources for which secondary and cumulative effects are to be assessed. The list of resources considered in this SCEA is primarily based on those resources which would be directly impacted by the project and includes parklands, surface waters, 100-year floodplains, wetlands and woodlands. In addition, the SCEA contains discussions on historic sites, protected agricultural land and agricultural land under development pressure. The Selected Alternate would not result in direct impacts to National Register eligible historic resources or prime farmland. Effects to threatened or endangered species are not considered in the SCEA because coordination with the US Fish and Wildlife Service and the Maryland Department of Natural Resources indicates that there are no known Federal or State listed threatened or endangered plant or animal species or anadromous fish species located in the project area. There are records for species of concern known to occur

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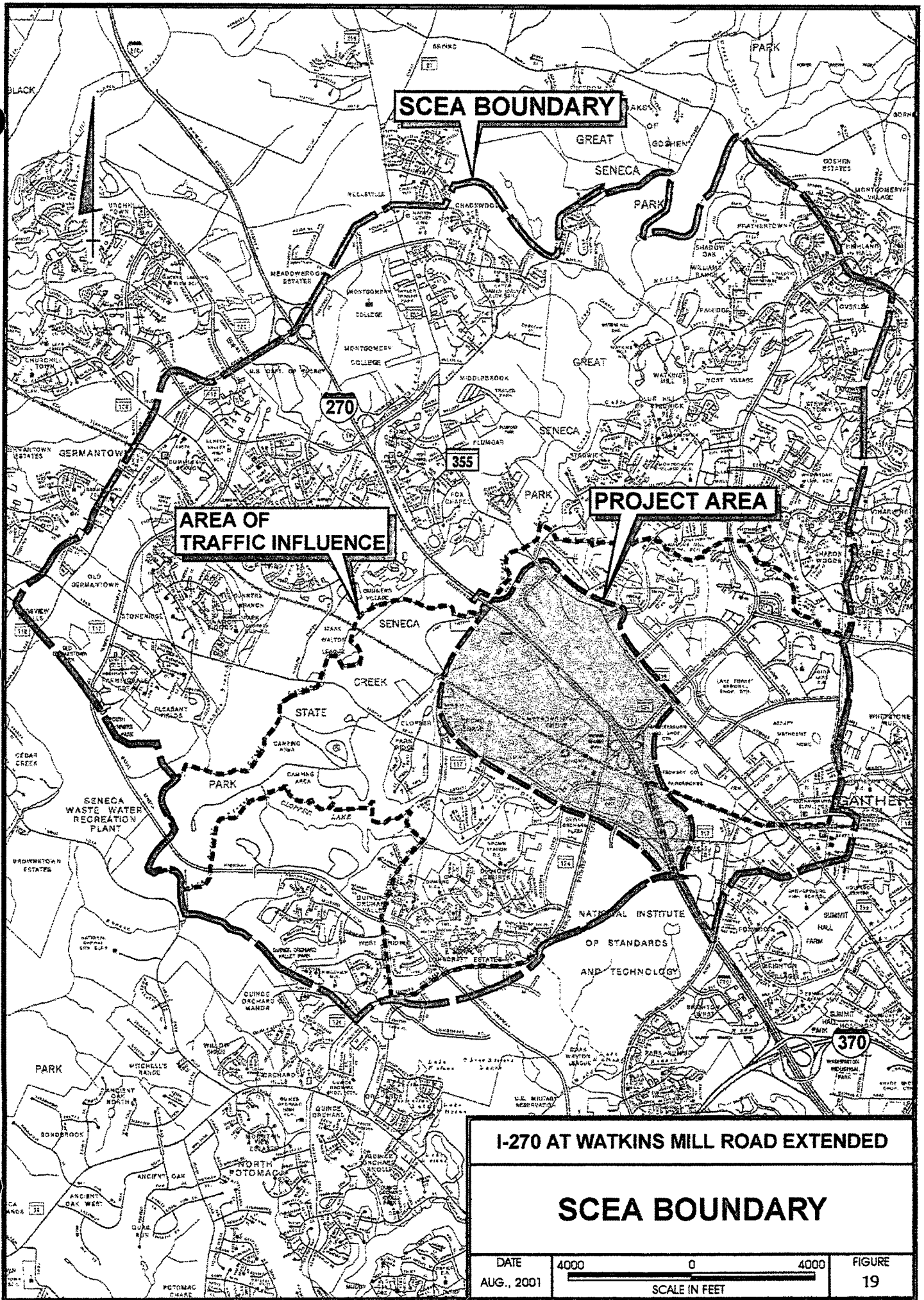
within the project site. However, as these species are unlikely to occur, it is not likely that direct or secondary impacts to these species would occur, and therefore no cumulative impacts would result.

b) Description of the SCEA Boundary

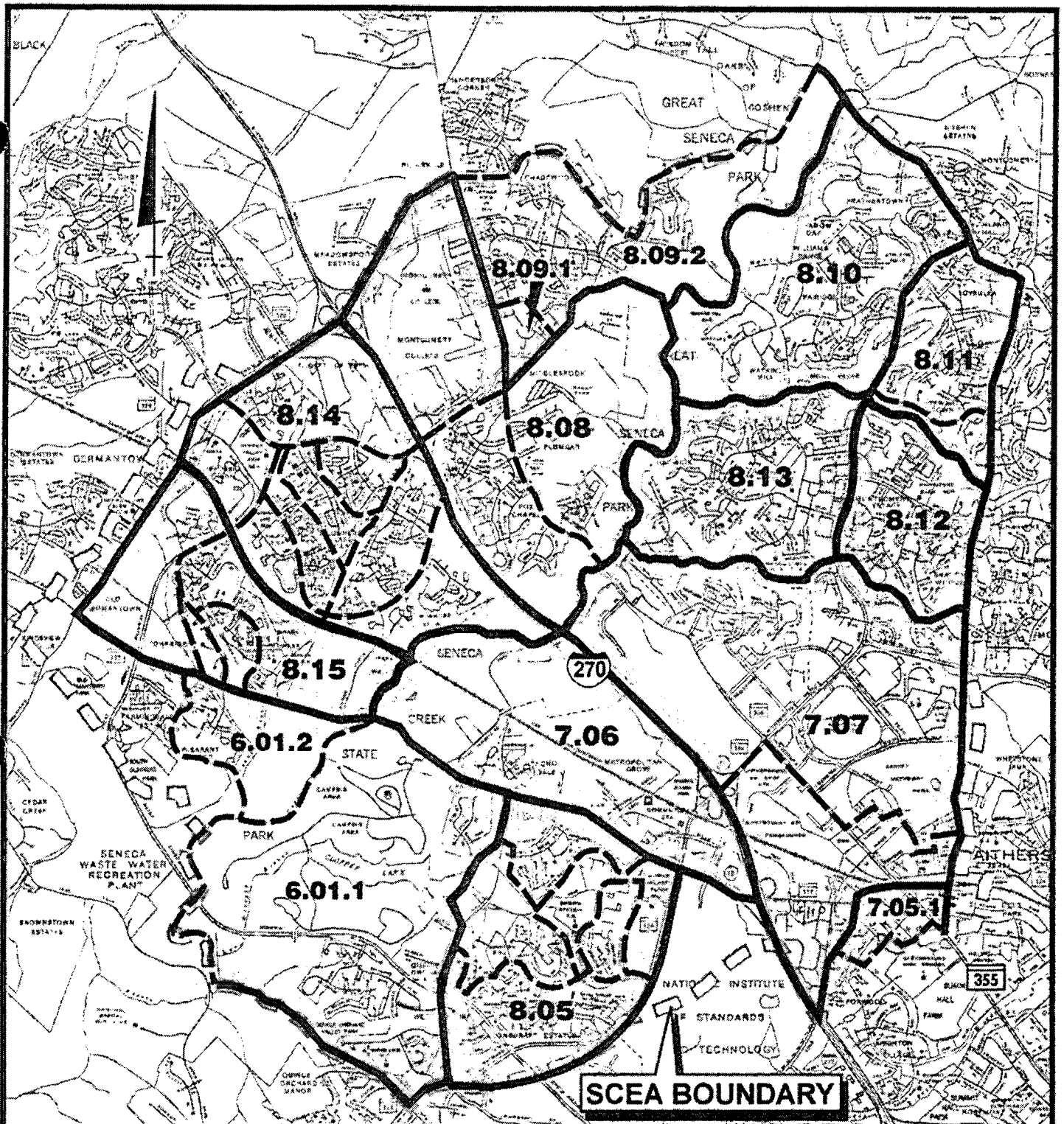
The geographic boundary for secondary and cumulative effects analyses, referred to as the SCEA boundary, is based on a number of sub-boundaries as shown on Figures 19 to 21 along with the project's SCEA boundary. The following sub-boundaries were considered in establishing the SCEA boundary: the extent of the improvements proposed by the project, the area of traffic influence, census tracts and block groups, planning areas, watersheds and sub-watersheds. In addition, the SCEA boundary for the I-270/US 15 Multi-Modal Corridor Study was considered in determining the overall extent of the SCEA boundary for the I-270/Watkins Mill Road Extended project since the project limits for the corridor study encompass the I-270/Watkins Mill Road Extended project area.

The overall SCEA boundary is a synthesis of the aforementioned sub-boundaries. The project's SCEA boundary encompasses the extent of the proposed improvements, as well as, the area of traffic influence which is the geographic extent to which the I-270/Watkins Mill Road Extended project would affect traffic levels on the nearby roadways. The watershed and sub-watershed delineations used in determining the SCEA boundary are based on the watershed/sub-watershed designations contained in Montgomery County's Countywide Stream Protection Strategy, which provides detailed watershed assessments and descriptions of these sub-watersheds. The project's SCEA boundary is described in detail below (Refer to Figures 20 and 21). The SCEA boundary lies within three planning areas - City of Gaithersburg, Gaithersburg Vicinity and Germantown and Vicinity.

- Beginning at the southern extremity of the SCEA boundary, at I-270, the SCEA boundary runs northeasterly along the 1990 census tract boundary between tracts 7007.07 and 7007.05 to the watershed boundary between Great Seneca Creek and Muddy Branch.
- It then follows the watershed boundary, easterly, to the sub-watershed boundary of Upper Long Draught.
- The SCEA boundary follows the Upper Long Draught sub-watershed boundary to the Whetstone Run sub-watershed boundary.



I-270 AT WATKINS MILL ROAD EXTENDED		
SCEA BOUNDARY		
DATE AUG., 2001	4000 0 4000 SCALE IN FEET	FIGURE 19



LEGEND

— SCEA Boundary

8.05 Census Tract Boundary (1990)

6.01.1 Census Block Group Boundary (1990)

NOTE:
All Census Tracts are 7000 Series for Montgomery County.

I-270 AT WATKINS MILL ROAD EXTENDED

SCEA CENSUS TRACTS AND BLOCK GROUPS

DATE
AUG., 2001

4000 0 4000
SCALE IN FEET

FIGURE
20

270

**Little Seneca Creek
Watershed**

**Great Seneca Creek
Watershed**

SCEA BOUNDARY

**Middle
Great
Seneca**

**Cabin
Branch**

**Gunners
Branch**

**Whetstone
Run**

**I-270
Tributary**

**Upper
Long
Draught**

**Lower
Long
Draught**

**Rock
Creek
Watershed**

**Muddy Branch
Watershed**

I-270 AT WATKINS MILL ROAD EXTENDED

SCEA SUB-WATERSHEDS

DATE
AUG., 2001

5000 0 5000
SCALE IN FEET

FIGURE
21

- The SCEA boundary runs northerly along the Whetstone Run sub-watershed boundary to the boundary of Census Tract 7007.07.
- It then runs northerly along the census tract boundary of tracts 7007.07, 7008.12 and 7008.11.
- The SCEA boundary then turns northwesterly and follows the census tract boundary of tracts 7008.11 and 7008.10 to the planning area boundary between Gaithersburg Vicinity and Goshen, Woodfield, Cedar Grove and Vicinity.
- It then runs northwesterly, then southwesterly, along the planning area boundary to the Germantown and Vicinity Planning Area.
- The SCEA boundary then turns northerly and follows the planning area boundary between Germantown and Vicinity and Goshen, Woodfield, Cedar Grove and Vicinity to the boundary of Census Block Group 7008.09.2.
- It then runs westerly along the boundary of Census Block Group 7008.09.2 to the Great Seneca Creek watershed boundary.
- The SCEA boundary runs southwesterly along the watershed boundary between Little Seneca Creek and Great Seneca, follows the boundary of Census Tract 7008.08 for a short distance and then continues along the watershed boundary to the I-270/US 15 SCEA boundary.
- It then turns southeasterly and follows the I-270/US 15 SCEA boundary to the sub-watershed boundary between Gunners Branch sub-watershed and Lower Long Draught-Quince Orchard sub-watershed.
- The SCEA boundary follows the sub-watershed boundary between Gunners Branch sub-watershed and Lower Long Draught-Quince Orchard sub-watershed to the Middle Great Seneca sub-watershed.
- The SCEA boundary runs southeasterly for a short distance along the sub-watershed boundary between Middle Great Seneca sub-watershed and Lower Long Draught-Quince Orchard sub-watershed and then follows the boundary of Census Block Group 7006.01.1 to the boundary of Census Tract 7006.01.

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- It then runs southeasterly along the boundary of Census Tract 7006.01 and then turns northeasterly and follows along the census tract boundaries of tracts 7006.01 and 7008.05 to the watershed boundary between Great Seneca Creek and Muddy Branch.
 - The SCEA boundary follows the watershed boundary, northeasterly, to the census tract boundary of tract 7007.07 and follows the census tract boundary southeasterly to the beginning point.

c) Temporal Limits of the SCEA

As part of the scoping process, a time frame is defined for the analysis of secondary and cumulative effects. The following events were considered in establishing the time frame for the SCEA which begins in 1980 and is projected through the design year 2020.

I-270 Chronology

- 1950's - The currently designated MD 355 was then called US 240 and in 1950, the construction of US 240 relocated, currently designated I-270, was begun.
- By 1960 - The original US 240 was redesignated as MD 355 and US 240 relocated was designated I-70S and US 240. The currently designated I-270Y (West Spur) was built and designated I-270.
- 1971 - The 3rd lanes were added in each direction between the Y-split and MD 118.
- 1975 - I-70 S was redesignated I-270.
- 1990 - The widening of I-270 to 8-lanes from the Y-split to Middlebrook Road was completed. This included new interchanges at MD 124, Middlebrook Road and I-370. Also, 2-lane CD roads were added to the portion from Montrose Road to the CSX bridge.
- 1996 - I-270 was widened to 3-lanes in each direction from MD 118 to MD 121 and HOV lanes were opened to I-495.

Major events that have occurred within the SCEA boundary include the following:

- The US Department of Energy, located in the northern extremity of the SCEA area, was established in 1977.

- Lakeforest Mall, the largest retail center in the Upcounty area located in the southern portion of the SCEA area, was built in 1978.
- Montgomery Village, a large residential community located in the southeastern portion of the SCEA area, was developed between 1966 and 1999, but underwent its most substantial growth in the 1980's.

In addition, rapid growth was experienced in the following areas:

- Gaithersburg, south of the project area, underwent rapid development in the 1970's making the City of Gaithersburg the fastest growing city in the state at that time.
- Germantown, north of the project area, experienced rapid residential development between 1980 and 1987 when more than 6,570 housing units were constructed which represented more than 60 percent of the entire residential housing stock in existence at that time.

Countywide data from the US Bureau of the Census show that the population in Montgomery County increased much greater during the period 1980 - 1990 than during the previous decade 1970 - 1980. As summarized below, the county experienced a 10.8 percent growth in population during the period 1970 - 1980 while the countywide population grew by 30.7 percent during the period 1980 - 1990.

Population In Montgomery County

			% Change 1970-1980	% Change 1980-1990
1970	1980	1990		
522,809	579,053	757,027	+10.8	+30.7

According to information from the Maryland Office of Planning (MDP), the total amount of developed land in Montgomery County grew by 8.8 percent during the period 1973 - 1981 and then grew by 23.7 percent during the period 1981 - 1990. Total development in Montgomery County during the period 1973 - 1990 is summarized below.

Developed Land In Montgomery County (Acres)

			% Change 1973-1981	% Change 1981-1990
1973	1981	1990		
87,996	95,703	118,376	+8.8	+23.7

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In light of the above information and taking into consideration that the analysis of secondary and cumulative effects is to be performed using existing readily available data, the past time frame for the project's SCEA is 1980. The future time frame for the SCEA is the year 2020 which is the design year for the I-270/Watkins Mill Road Extended project.

2) Analysis

a) Methodologies

A combination of methodologies is used to assess secondary and cumulative effects to each SCEA resource considered. Quantified data is used if readily available but for the most part, the SCEA is presented qualitatively.

Separate discussions are provided for secondary effects and cumulative impacts to the SCEA resources considered. Secondary effects are discussed based on information contained in area master plans regarding potential development subject to staging constraints in conjunction with transportation improvements to Watkins Mill Road. For cumulative impacts from past actions, information is provided on past impacts to the resource and trends, if available. Various data sources were used to gather this information, including published literature and mapping from local, state and federal government offices, as well as, interviews with key personnel in these offices. Past land uses are compared to present land uses and related to impacts to a particular resource over time. For cumulative effects from future actions, a qualitative discussion of impacts to resources based on the future land use scenario within the SCEA boundary is provided in the context of the current regulatory framework.

b) Past, Present and Future Land Use Within the SCEA Boundary

Within the SCEA time frame (1980-2020), past, present and future land use within the SCEA boundary is identified. Based on available land use/land cover data from the Maryland Office of Planning (MDP), land use within the SCEA boundary in 1981 and 1997 is used to represent the past and present land use scenarios, respectively. Land use in 1990 is also identified to provide an intermediate condition between the past and present. Information from the land use plans contained in the area master plans for City of Gaithersburg, Gaithersburg Vicinity and Germantown and Vicinity is used to depict the future time frame (2020) for the SCEA. Land uses within the SCEA boundary include the following: residential, commercial, industrial, institutional, employment, mixed use, open space/parkland, open urban land, agriculture and forest. Countywide land use in 1981 and 1990 is also identified based on information from the MDP publication, "Maryland's Land, 1973-1990, A Changing Resource".

Table 15 depicts land use in Montgomery County and Table 16 summarizes land use within the SCEA boundary. Present (1997) land use in the SCEA is shown on Figure 22.

TABLE 15
LAND USE IN MONTGOMERY COUNTY

Land Use	1981 (Acres)	1990 (Acres)	% Change
Low Density Residential	29,528	39,056	+32.3
Medium/High Density Residential	39,592	48,927	+23.6
Commercial/Industrial	8,817	10,521	+19.3
Institutional/Open	15,797	16,072	+ 1.7
Bare Ground	1,969	3,800	+93.0
Agriculture	122,713	107,654	-12.3
Forest	97,564	89,318	- 8.5
Extractive/Barren	592	752	+27.0
Wetland	172	172	0
Water	7,780	8,252	+ 6.1
Total	324,524	324,524	

Source: "Maryland's Land, 1973-1990, A Changing Resource", Maryland Office of Planning

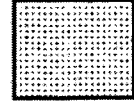
LEGEND



Residential



Institutional



Commercial



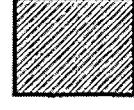
Industrial



Forest



Open Urban
Land



Agriculture



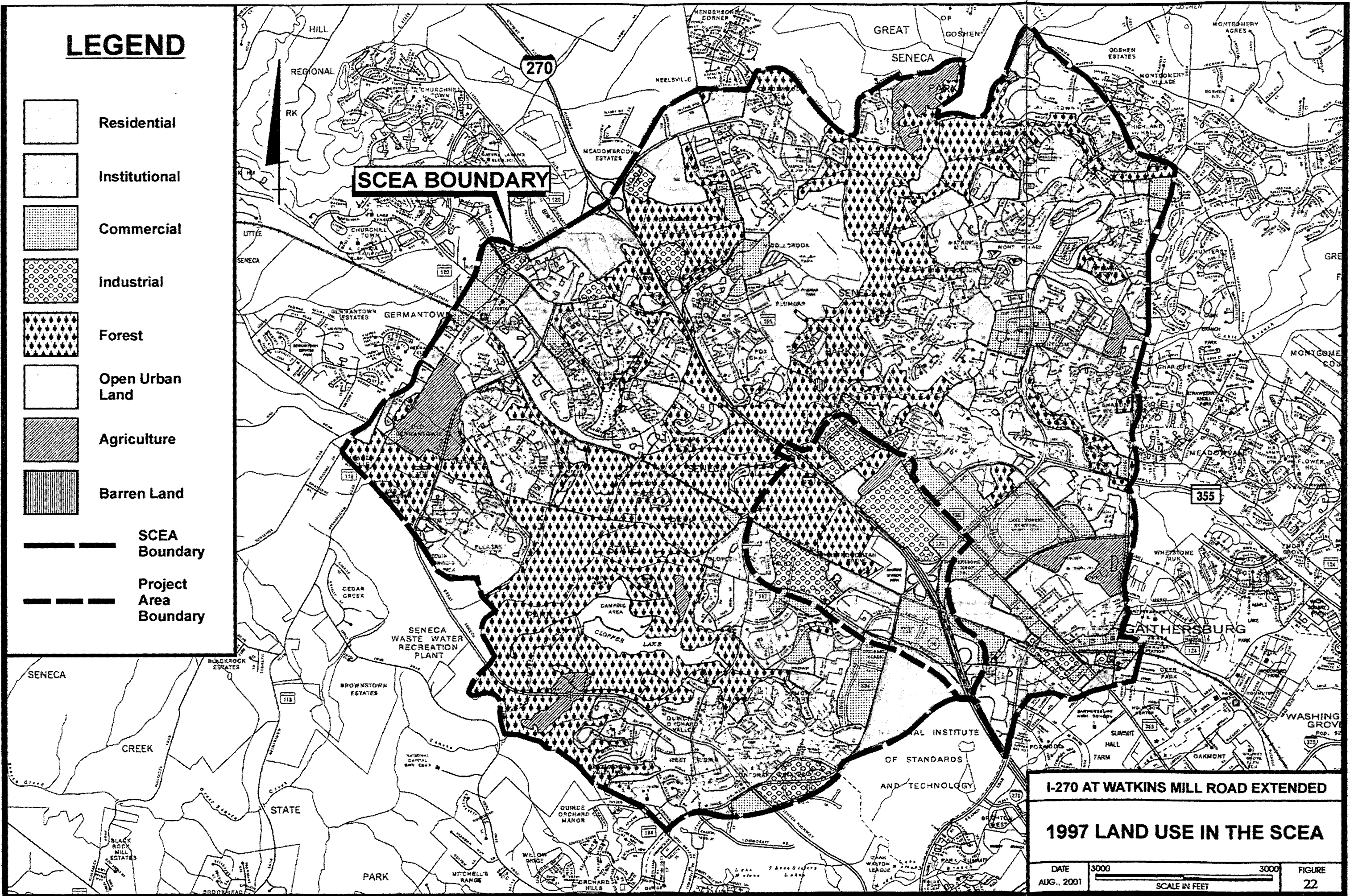
Barren Land



SCEA
Boundary



Project
Area
Boundary



I-270 AT WATKINS MILL ROAD EXTENDED

1997 LAND USE IN THE SCEA

DATE	3000	3000	FIGURE
AUG., 2001	SCALE IN FEET		22

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TABLE 16
LAND USE WITHIN THE SCEA BOUNDARY

Land Use¹	1981 (Acres)	1990 (Acres)	1997 (Acres)	2020 (Acres)
Residential	2,956	4,291	5,000	5,321
Commercial	828	1,107	1,131	1,102
Industrial	0	50	521	294
Institutional	556	670	962	908
Employment	not categorized	not categorized	not categorized	238
Mixed Use	not categorized	not categorized	not categorized	97
Open Space/Parkland	not categorized	not categorized	not categorized	2,777
Open Urban Land	496	580	575	not categorized
Utility	not categorized	not categorized	not categorized	195
Private Conservation	not categorized	not categorized	not categorized	531
Agriculture	2,668	1,478	437	not categorized
Forest	4,280	3,591	3,457	not categorized
Barren Land	129	263	10	not categorized
Total²	11,913	12,030	12,093	11,463

Source: 1981, 1990 and 1997 Land Use – Land Use/Land Cover Maps, Maryland Office of Planning
 2020 Land Use – City of Gaithersburg Master Plan, 1997
 Gaithersburg Vicinity Master Plan, Amended 1990
 Germantown Master Plan, 1989

¹The various data sources identify specific land uses as differing categories.

²Totals vary due to the following: differences in the level of detail provided by the various data sources, and water resources are not included.

Based on the above data for land use within the SCEA boundary, developed land (residential, commercial, industrial, institutional) increased by 75 percent (3,274 acres), from 4,340 to 7,614 acres, during the period 1981-1997. The 2020 developed land (residential, commercial, industrial, institutional, employment, mixed use) totals 7,960 acres. Although different data sources are used for 1997 and 2020 land uses, a comparison of developed land projects an increase of 5 percent (346 acres), from 7,614 to 7,960 acres, during the period 1997-2020.

According to local planners and information contained in the area master plans, the amount of development within the SCEA boundary that is dependent on improvements associated with the I-270/Watkins Mill Road Extended project represents a small portion of the potential development within the entire SCEA boundary. Most of the development can occur regardless of having an interchange at I-270 and Watkins Mill Road. The portion of the

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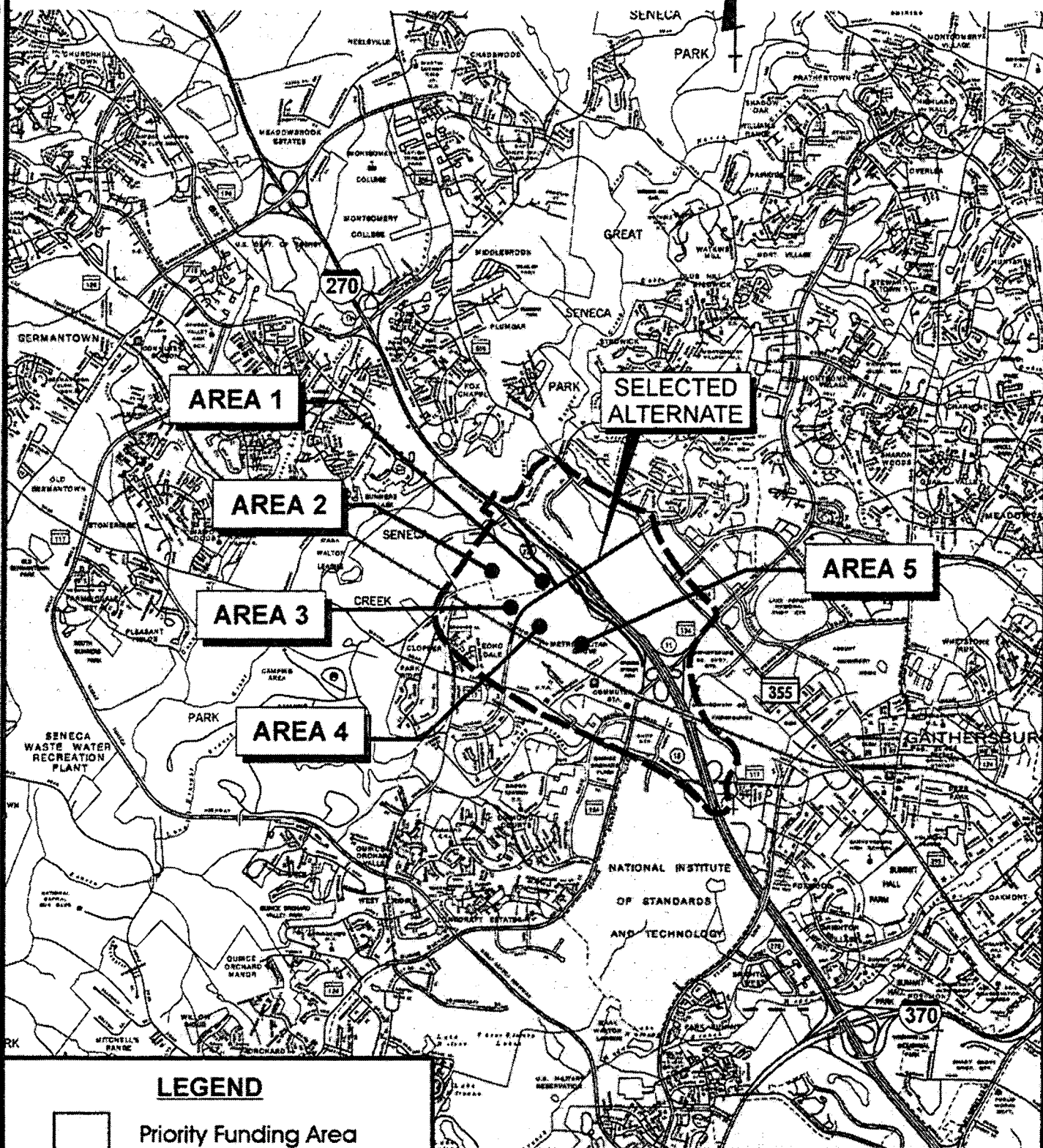
Germantown planning area that is included within the SCEA boundary contains land that is either developed or planned for development that is not dependent on the improvements proposed by the I-270/Watkins Mill Road Extended project. For the most part, the land in the Gaithersburg Vicinity planning area that is included within the SCEA boundary is developed. The City of Gaithersburg, within the SCEA boundary, contains vacant land that is planned for development, as well as, properties planned for re-development. As outlined in the City of Gaithersburg Master Plan, certain roadway improvements must occur before all development can be completed in some of these areas. Development that is dependent on improvements associated with the project is discussed further in Section III.B.4.g.3. These development areas are located in the Priority Funding Area (Figure 23) designated in Montgomery County.

As part of the assessment of cumulative effects, a number of other projects within the SCEA time frame (1980 - 2020), which have been completed, are currently underway, or are planned in the reasonably foreseeable future are identified within the SCEA boundary. This information is largely based on the Maryland State Highway Administration's (SHA) Constrained Long Range Plan (CLRP) and Consolidated Transportation Program (CTP) and Montgomery County's capital construction program. Existing readily available information was used to identify projects and obtain information about them. Some projects had more information readily available than others. Direct impacts from these projects in combination with the impacts from the I-270/Watkins Mill Road Extended project add to the cumulative effects within the SCEA boundary. The identified projects are discussed below and indicated on Figure 24.

Other Projects Within the SCEA Boundary

- **I-270, Shady Grove Road to Y-Split, Multi-Lane Reconstruction:** Construction began on this SHA project in 1987 and was completed in 1992. It included 2-lane collector-distributor (C-D) roads from Montrose Road to the CSX bridge south of MD 124, only the northern portion of which are located within the SCEA boundary. (See note below for information on environmental impacts.)
- **I-270, South of MD 118 to Shady Grove Road, Eight Lane Reconstruction:** Construction began on this SHA project in 1989 and was completed in 1992. Excluding the southern portion of the project, the remaining portion is located within the SCEA boundary. (See note below for information on environmental impacts.)
- **I-270 (HOV Lanes):** This project was completed by SHA in 1996 and provided widening improvements from Middlebrook Road to north of MD 121, widening the facility (from 4 to 6-lanes). The southern portion of the overall improvements

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LEGEND



Priority Funding Area



Project Area Boundary

AREA 1 Development linked to infrastructure Improvements - See Section III.B.4.g.3.

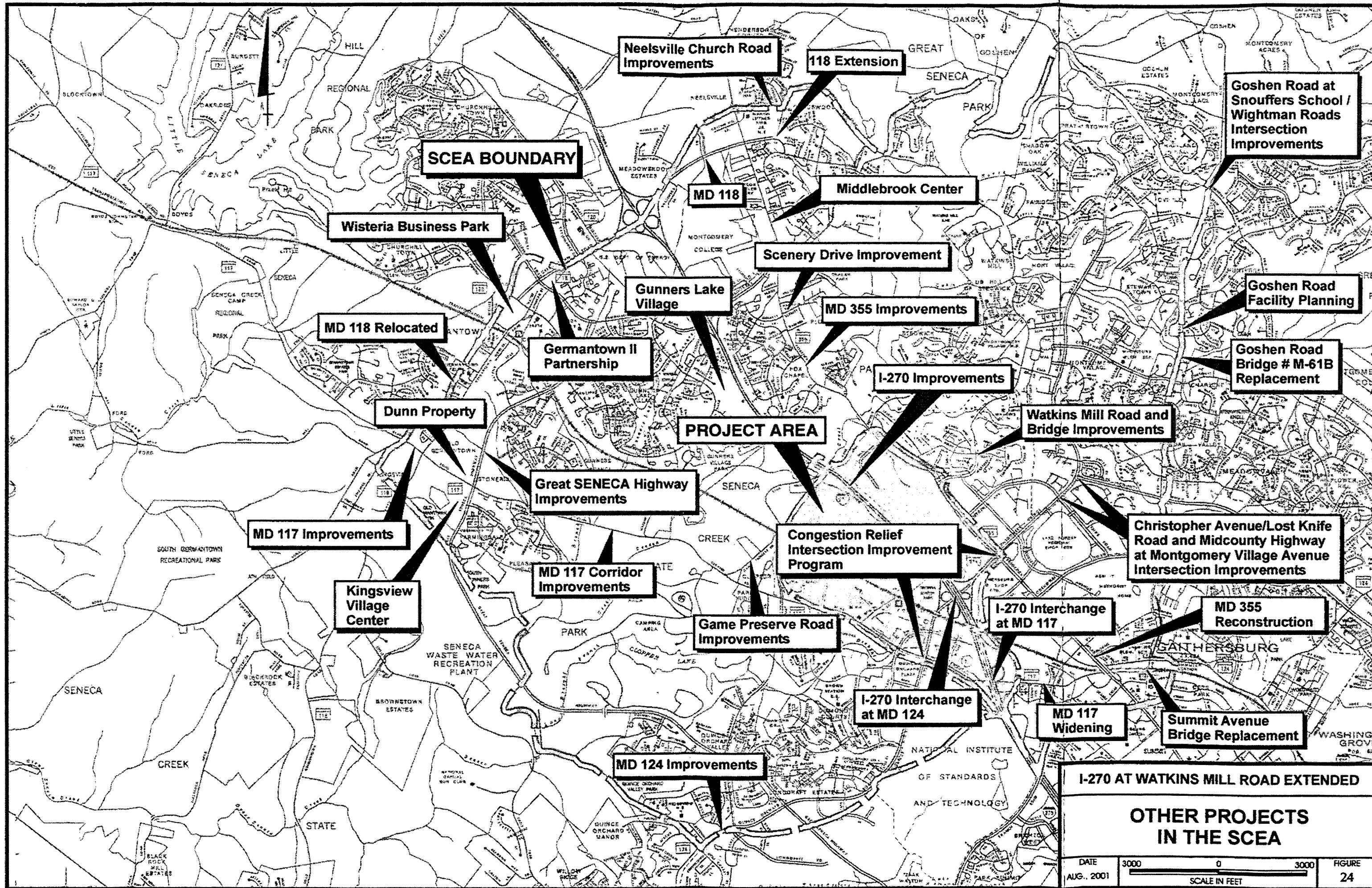
I-270 AT WATKINS MILL ROAD EXTENDED

MONTGOMERY COUNTY PRIORITY FUNDING AREA

DATE
AUG., 2001

4000 0 4000
SCALE IN FEET

FIGURE
23



provided by the project is located within the northern extremity of the SCEA area. (See note below for information on environmental impacts.)

- **I-270 NB (HOV Lane):** This work was completed by SHA in 1996 and consisted of two separate projects that provided modification improvements from south of Montrose Road to MD 124 and from MD 124 to Middlebrook Road. Only the northern portion of the first-listed project limits are located within the SCEA boundary while the second listing of improvement limits is wholly within the SCEA boundary. (See note below for information on environmental impacts.)
- **I-270 SB (HOV Lane):** This project was completed by SHA in 1996 and provided modification improvements from south of MD 118 to I-370. Excluding the southern portion of the project, the remaining portion is located within the SCEA boundary. It should be noted that the HOV lane added between I-370 and MD 121 has not been converted to HOV use but functions as a general use lane. (See note below for information on environmental impacts.)

(Note: The FONSI for I-270, from the Y-split to MD 121 lists the selected alternate as an eight-lane main line flanked by parallel C-D roads with a minimum of two lanes in each direction. The environmental summary includes the following impacts from the selected alternate: water quality - negligible effect, aquatic life - slight decrease in diversity, loss of habitat - 74 acres, wetlands affected - 4.5 acres, floodplains affected - 6 acres, parks - minor).

- **I-270 Interchange at MD 124:** Construction of this project by SHA began July 1999 and is approximately 30 percent completed. Construction is to be completed Spring, 2001. Improvements include closing the I-270 southbound to MD 124 eastbound loop ramp, providing a park and ride lot and modifying the I-270 southbound to MD 124 westbound ramp to accommodate movements to westbound and eastbound MD 124, as well as movements to the new 400 space park and ride lot. This work is contained within the existing right-of-way. This project will eliminate a hazardous weave situation on southbound I-270 and provide needed park and ride spaces in the Gaithersburg area. Impacts with this project were extremely minor, as all improvements were contained within existing right-of-way.
- **MD 117 Corridor Improvements:** SHA Project Planning is underway for improvements to existing intersections on MD 117 from Seneca Creek State Park to I-270. This project has a completion date of 2010 and includes intersection capacity improvements that are needed to relieve existing congestion and provide for approved

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and planned development in Germantown. (The draft Categorical Exclusion for this project includes the following environmental impacts: 100-year floodplains - 1.8 acres, wetlands - 0.04 acre, streams - 54 linear feet, 3 significant trees.)

- **MD 124:** The first phase of this project was completed by SHA in 1997 and provided widening improvements (from 2 to 4-lanes) from MD 28 to Longdraft Road. The next phase has a completion date of 2020 and provides widening improvements (from 4 to 6-lanes) within the same limits. Only the eastern portion of this project is located on the extreme western end of the SCEA area. This roadway was originally designed as a six-lane facility and approved under a 1988 FEIS in combination with MD 28 improvements. Widening impacts to four lanes were extremely minor, as they will be when expansion to six lanes occurs.
- **MD 355:** The initial section of this project was completed by SHA in 1996 and provided widening improvements (from 2 to 4-lanes) from Middlebrook Road to MD 27. Excluding the northern portion of this initial section, the remaining portion of the section is located within the SCEA boundary. A subsequent section of this project was completed in 1999 and provided widening improvements (from 2 to 6-lanes) from MD 124 to Middlebrook Road in order to relieve congestion on MD 355. Another phase of widening improvements (from 4 to 6-lanes) for the section of MD 355 from Middlebrook Road to MD 27 is scheduled for completion in 2010. (The Environmental Assessment for MD 355, from MD 27 to MD 124, lists Alternate 3 as providing 6-lanes. The summary of impacts includes the following impacts from Alternate 3: wetlands - 1.34 to 2.02 acres, floodplains - 1.90 to 2.56 acres, parklands - 4.38 to 4.61 acres, woodlands - 8.4 acres).
- **Goshen Road Facility Planning:** In the planning stage, this project by Montgomery County will provide widening improvements (from 2 to 4-lanes) from Girard Street to Warfield Road. Excluding the eastern portion of the project, the remaining portion is located along the southern end of the SCEA area. Information on environmental impacts was not readily available from Montgomery County.
- **Great Seneca Highway:** Not currently under construction, this project by Montgomery County will provide widening improvements (from 4 to 6-lanes) from Middlebrook Road to MD 124. Excluding a small segment centrally located within the project, the remaining portion is located within the SCEA boundary. Information on environmental impacts was not readily available from Montgomery County.

- **MD 117:** This project was completed by Montgomery County in 1999 and provided reconstruction and widening improvements (from 2 to 6-lanes) from existing MD 118 to relocated MD 118, approximately 600 feet. Information on environmental impacts was not readily available from Montgomery County.
- **MD 118 Relocated:** This work was completed by Montgomery County in 1999 and consisted of two separate projects which relocated MD 118 to the north of the existing alignment from south of MD 117 to MD 117 and from MD 117 to Wisteria Drive, a total of approximately 1.2 miles. The new roadway is a 6-lane facility. Information on environmental impacts was not readily available from Montgomery County.
- **MD 118:** This project has been completed by Montgomery County. It provided a 6-lane facility on a new alignment to the south of the existing MD 118 from MD 355 to I-270, approximately 0.8 mile. Information on environmental impacts was not readily available from Montgomery County.
- **MD 118 Extension (Germantown Road):** The initial section of this project has been completed by Montgomery County. It provided a 3-lane facility which extended MD 118 Relocated from MD 355 to Scenery Drive. A subsequent section, currently in the detailed design stage, will extend MD 118 as a 3-lane facility from Scenery Drive to Watkins Mill Road and is scheduled for completion in 2004. Information on environmental impacts was not readily available from Montgomery County.
- **Watkins Mill Road and Bridge:** This project was completed by Montgomery County in 1998 and provided widening improvements (from 1 or 2-lanes to 4-lanes) from north of Travis Avenue to Watkins Mill Drive. Information on environmental impacts was not readily available from Montgomery County.
- **I-270 Interchange at MD 117:** Final engineering and right-of-way acquisition by SHA are underway for construction of a new I-270 northbound to MD 117 eastbound ramp, a park and ride facility inside the loop ramp in the northeast quadrant, and the widening of MD 117 to allow it to operate at an acceptable level of service. This project will provide needed park and ride spaces in the Gaithersburg area and will provide access to Olde Town Gaithersburg. Construction is scheduled to begin Fall 2001 and be completed Fall 2002. This project is covered under the MD 117, I-270 to Muddy Branch Road, Categorical Exclusion discussed below.

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- **Congestion Relief Intersection Improvement Program:** This SHA program provides improvements to a number of intersections in northern Montgomery and western Prince George's Counties. The improvements will provide relief to traffic congestion and improve east/west travel between I-270 and US 1. Final engineering and right-of-way acquisition/construction are underway at various locations. Of the intersections included in the program, two are located within the SCEA boundary. At the intersection of MD 355 and MD 124, construction was scheduled to begin Spring 2000 to add an eastbound through lane, add northbound and southbound left-turn lanes, and change the westbound right-turn lane to a right/through lane. Improvements at the intersection of MD 117 and MD 124 that will add eastbound and westbound through lanes with no split phasing are scheduled to be advertised for construction in 2003. Impacts will be extremely minor for these intersection widening projects.
 - **MD 355, South Summit Avenue to Chestnut Street:** This SHA project received Location Approval in 1980. It provided for the reconstruction of five lanes. Information on environmental impacts was not readily available.
 - **Summit Avenue Bridge over CSX:** This SHA project provided for replacement of the Summit Avenue Bridge over the CSX rail lines. A Categorical Exclusion was completed in 1990, based on extremely minor impacts.
 - **MD 117, I-270 to Muddy Branch Road:** This SHA project includes widening, for 0.35 miles, on the north side of MD 117 to provide an additional through lane and five foot wide sidewalk, an eight foot wide hiker/biker trail on the south side of MD 117, and a park and ride lot. This project is in conjunction with the park and ride project at the I-270/MD 117 interchange. A Categorical Exclusion was completed in December, 1999. (The Final Categorical Exclusion for this project includes the following environmental information: two residential relocations are required; no wetlands or waters of the US are present in the project area; the project may impact the 100-year floodplain of Long Draught Branch.)
 - **Neelsville Church Road:** This Montgomery County project is in the detailed design stage and is part of the public facilities roads project which reimburses developers for street construction that abuts County schools, M-NCPPC parks or other County facilities. Information on environmental impacts was not readily available from Montgomery County.

- **Scenery Drive:** Detailed design has been completed by Montgomery County for this project from east of MD 355 to south of Middlebrook Road. It is part of the public facilities roads project which reimburses developers for street construction that abuts County schools, M-NCPPC parks or other County facilities. Information on environmental impacts was not readily available from Montgomery County.
- **Game Preserve Road:** This Montgomery County project in the vicinity of Saint Rose of Lima Church on MD 117 has been completed and is open to traffic. It is part of the subdivision roads participation project that provides for the design, review and construction of roads or utility work that jointly benefits new subdivisions and the public-at-large. Information on environmental impacts was not readily available from Montgomery County.
- **Goshen Road Bridge No. M-61B:** This Montgomery County project is in the detailed design stage and will provide a new 2-lane bridge with increased hydraulic capacity to replace the existing deteriorated 2-lane bridge over Cabin Branch. Information on environmental impacts was not readily available from Montgomery County.
- **Christopher Avenue/Lost Knife Road and Midcounty Highway at Montgomery Village Avenue:** This Montgomery County project provides intersection improvements to relieve congestion and improve the level of service at each intersection. Notice to proceed with construction was issued in May, 2000. Information on environmental impacts was not readily available from Montgomery County.
- **Goshen Road at Snouffer School/Wightman Roads:** Intersection improvements for congestion mitigation are being studied by Montgomery County at this location as part of the intersection and spot improvements project. Information on environmental impacts was not readily available from Montgomery County.

In addition, through M-NCPPC, developer's projects within the SCEA boundary that have obtained approvals for site plans or subdivision plans have been identified and include the following:

- **Kingsview Village Center:** Located at MD 117 and Great Seneca Highway, 114,000 square feet of commercial/office space is proposed on 46.6 acres. Plans also include park dedication and a park and ride lot. Site plans have been approved. Information on environmental impacts was not readily available.

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- **Middlebrook Center:** Located at MD 355 and Hudgel Lane, plans propose three commercial lots providing 53,083 square feet. The subdivision plans for this project have been approved. Information on environmental impacts was not readily available.
 - **Wisteria Business Park:** Located on the south side of Wisteria Drive, approximately 200 feet west of Old Germantown Road, plans propose three lots for office use. Approval of subdivision plans is pending. Information on environmental impacts was not readily available.
 - **Germantown II Partnership:** Located on the south side of MD 118 near Middlebrook Road, plans propose two commercial lots on six acres. Subdivision plan approval has been extended for this project. Information on environmental impacts was not readily available.
 - **Dunn Property:** Located in the northwest quadrant of Clopper Road and Great Seneca Highway, plans propose 46 townhouse units on six acres. Subdivision plan approval has been extended for this project. Information on environmental impacts was not readily available.
 - **Gunners Lake Village:** Located at I-270 and Waring Station Road, plans propose a 1,200 seat facility (New Covenant Fellowship Church) on 34 acres. Subdivision plans have been approved. Information on environmental impacts was not readily available.

3) Secondary Effects

According to information contained in the area master plans, the amount of development that is dependent on improvements associated with the I-270/Watkins Mill Road Extended project represents a small portion of the potential development within the entire SCEA boundary. The majority of planned development can occur under the No Build scenario, which includes minor construction projects and developer-based improvements associated with new developments. Development that is subject to staging constraints in conjunction with improvements to Watkins Mill Road, including an interchange with I-270, is defined in the City of Gaithersburg Master Plan and is concentrated in an area of almost entirely vacant land located between I-270, the MARC/CSX rail lines, Game Preserve Road and MD 124. The City of Gaithersburg Master Plan does not differentiate between types of interchanges with regard to secondary development in the area but merely outlines the development that is dependent on "an interchange" at I-270/Watkins Mill Road Extended. The Selected Alternate would provide a full

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diamond interchange. The City's Master Plan also defines the development, in the previously described area, that can be supported at various stages of the extension of Watkins Mill Road from MD 117 to MD 355. Much of this development can occur under the No Build scenario through developer-based improvements, however, development that is dependent on Watkins Mill Road Extended crossing over I-270, with an interchange, is secondary development linked to the Selected Alternate. Development that can occur with the No Build and secondary development linked to transportation improvements that correspond to the Selected Alternate is described below based on the information in the City of Gaithersburg Master Plan. Figure 23 indicates the location of these areas of planned development that are defined in the City's Master Plan.

Area 1 - The master plan land use designated for this area is commercial-industrial-research-office. Area 1 is located on a portion of the Casey Tract West (Planned Development Area 3 in Figure 3). This area could be developed for an office or a hotel conference center at varying densities depending on the following:

- The extension of West Watkins Mill Road to the edge of the I-270 right-of-way would support an office building or hotel equaling 300,000 square feet.
- The extension of West Watkins Mill Road from the CSX rail line over I-270 to intersect with Frederick Avenue would support an office building and hotel to include a maximum of 600 rooms or an 80,000 square foot conference center also to include 40,000 square feet of commercial/retail space.
- The extension of West Watkins Mill Road from the CSX rail line over I-270 with direct access from I-270 by way of an interchange would support an office building, hotel and additional conference center. (Note: This corresponds to the Selected Alternate and indicates secondary development linked to it.)

Area 2 - The master plan land use designated for this area is mixed residential. Area 2 is located on a portion of the Casey Tract West (Planned Development Area 3 in Figure 3). The extension of West Watkins Mill Road over the CSX rail line would support the development of this area to provide a maximum of 300 housing units with 50 percent being single-family detached and 50 percent being single-family attached units equaling seven units per acre.

Area 3 - The master plan land use designated for this area is commercial-industrial-research-office. Area 3 is located on a portion of the Casey Tract West (Planned Development Area 3 in Figure 3). The extension of West Watkins Mill Road over the CSX rail line into the

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site would support commercial development in this area. A retail center of 150,000 square feet could be developed following an approved traffic study.

Area 4 - The master plan land use designated for this area is commercial-office-residential. Area 4 is located on a portion of the Casey Tract West (Planned Development Area 3 in Figure 3). The extension of West Watkins Mill Road over the CSX rail line to provide access to the site would support the development of this area for a highway oriented use, such as a bank, service station or other convenience shopping use. This area could also contain a transit related parking structure.

Area 5 - The master plan land use designated for this area is commercial-office-residential. As stated in the City's Master Plan, certain infrastructure improvements must occur before development can proceed. Development of the area could occur in phases after a traffic study is approved by the City traffic engineer. The density of residential and commercial development is subject to the following:

Residential Development

- The extension of West Watkins Mill Road across the CSX rail line into the site would support a base density of 600 residential units.
- If West Watkins Mill Road is further extended to I-270, an additional 250 units could be developed.
- If an interchange is in place at I-270 and West Watkins Mill Road, an additional 400 units could be developed. (Note: This corresponds to the Selected Alternate and indicates secondary development linked to it.) An additional 250 units could be developed if a transit-way (light rail or busway) is constructed.

Commercial Development

- The extension of West Watkins Mill Road from the CSX rail line to I-270 with two access points into the area would support a mixed use development not to exceed 700,000 square feet of office/retail space.
- The extension of West Watkins Mill Road from the CSX rail line over I-270 and intersecting with MD 355, and a grade separated crossing at Metropolitan Grove Road and the CSX rail line with an internal access link to West Watkins Mill Road would support an additional 500,000 square feet of office/retail space.

- An interchange at I-270 and West Watkins Mill Road would support an increase in density of an additional 300,000 square feet of office/retail space. (Note: This corresponds to the Selected Alternate and indicates the secondary development linked to it.)
- If right-of-way dedicated for the Shady Grove/Clarksburg Transitway for light rail or busway is conveyed to Montgomery County and construction begun, an additional 200,000 square feet of office/retail space could be developed.

Following is a discussion of the secondary effects on SCEA resources that would result based on the potential development linked to the Selected Alternate.

a) Surface Waters

The Selected Alternate could have secondary effects on surface waters within the SCEA boundary. Secondary development linked to the Selected Alternate, as discussed above, would be located in the I-270 Tributary sub-watershed of the Great Seneca Creek. The secondary development associated with the Selected Alternate would result in replacing natural land cover with impervious areas which would increase stormwater runoff that could cause erosion and sedimentation in waterways and impact stream habitat conditions and aquatic life. The loss of natural land cover would also reduce groundwater infiltration which is detrimental to natural stream hydrology. These secondary effects caused by the Selected Alternate would be mitigated through compliance with stormwater management and sediment and erosion control requirements administered by the Maryland Department of the Environment (MDE). Sediment and erosion control measures in place during construction would limit the sediment reaching the waterways and long-term stormwater management would control the runoff from new development. Also, best management practices utilized in stormwater management facilities would improve the water quality of the stormwater runoff.

b) Floodplains

Secondary development linked with the Selected Alternate would be located in the vicinity of the 100-year floodplain associated with the I-270 Tributary. As indicated on Flood Insurance Rate Maps from the Federal Emergency Management Agency (FEMA), the 100-year floodplain extends between 50 and 100 feet, approximately, on either side of the I-270 Tributary which extends south of Game Preserve Road along the west side of I-270. Current Maryland, federal and local regulations discourage development in floodplains and a Waterways Construction Permit is required for any floodplain encroachment. Also, the City of Gaithersburg Master Plan contains recommendations that portions of the area around the tributary be

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designated open space, the exact boundaries of the open space to depend on a schematic development plan of the area, as well as, a natural resources inventory. Given this and the current federal and state regulatory framework, it is unlikely that any major floodplain encroachment would occur as a secondary effect of the Selected Alternate.

c) Wetlands

Secondary development, previously described, that is linked with the Selected Alternate would be located in the vicinity of wetland systems associated with the I-270 Tributary. The wetlands identified include the following types: palustrine forested, palustrine emergent and palustrine scrub-shrub. Wetlands are regulated through the requirements of Section 404 of the Clean Water Act, the Maryland Nontidal Wetlands Protection Act and the "no net loss" wetlands policies. The footprint of the secondary development associated with the Selected Alternates is not known at this time, however, given the current federal and state regulatory framework, it is likely that the secondary effects to wetlands from the Selected Alternate would be minimal.

d) Woodlands

The Maryland State Forest Conservation Technical Manual defines a forest stand as a forested area greater than 10,000 square feet and with a minimum width of 35 feet. Secondary development linked with the Selected Alternate would be located in the vicinity of several forest stands identified between I-270 and the MARC/CSX rail lines, south of Game Preserve Road. Of the forest stands identified, the smallest measures approximately 1.5 acres and the largest approximately 72.2 acres. These forest stands also contain numerous "significant trees", which are defined as trees with a diameter at breast height (DBH) of 24 inches or greater, and "specimen trees", which exhibit a DBH of 30 inches or greater.

As discussed previously at the beginning of Section III.B.4.g.3., areas of planned development linked to infrastructure improvements associated with the I-270/Watkins Mill Road Extended project are shown on Figure 23, labeled as Areas 1 through 5. The majority of this development can be supported at various stages of the extension of Watkins Mill Road up to the I-270 right-of-way, which can occur under the No-Build scenario through developer-based improvements. This development would therefore, not be linked to the Selected Alternate. As defined in the City of Gaithersburg Master Plan, some of these areas could develop further if an interchange is in place at I-270/Watkins Mill Road Extended such as would be provided by the Selected Alternate. This development could result in secondary effects to woodlands. The amount of woodlands present in Areas 1 through 5 is as follows: a total of approximately 79.5 acres of woodlands north of Watkins Mill Road Extended in the vicinity of Areas 1, 2 and 3, and a total of approximately 60.1 acres of woodlands south of Watkins Mill Road Extended in the

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vicinity of Areas 4 and 5. While the potential exists, no major impacts to woodlands from secondary development are expected since the majority of development in Areas 1 through 5 can occur under the No-Build, not as a secondary effect of the Selected Alternate. Also, the regulations of the Maryland Forest Conservation Act of 1991, through restrictions on forest clearing and requirements for reforestation, provide a strong incentive for forest conservation. However, the footprint of the secondary development is not known at this time.

e) Parklands

There are no parklands identified in the immediate area of the secondary development that is linked to the Selected Alternate. Therefore, secondary effects to parklands are not anticipated.

f) Historic Resources

An inventory of historic resources within the SCEA boundary was compiled based on previous SHA coordination with the Maryland Historical Trust that was conducted for the I-270/US 15 Multi-Modal Corridor Study. The inventory includes listings from the National Register of Historic Places (NRHP) and the Maryland Inventory of Historic Places (MIHP). The historic resources are indicated on Figure 25 and their names are listed with their corresponding mapping identification number in Section III.B.4.g.4.f. and the Appendix.

The inventory does not identify any NRHP resources in the area of secondary development associated with the Selected Alternate but does identify two MIHP resources bordering the area of secondary development - the B&O Railroad Underpass and the Metropolitan Branch B&O Railroad, indicated on Figure 25, as numbers 36 and 37, respectively. Given their location, it is not expected that the planned development dependent on the Selected Alternate would result in impacts to these historic resources and therefore, secondary effects are not anticipated. However, the footprint of the secondary development is not known at this time.

g) Agricultural Land

Although the agriculturally zoned land in Montgomery County lies outside the SCEA boundary, some agricultural uses are taking place on land within the SCEA boundary that is zoned other than agriculture. Active agricultural land is located in the area of secondary development linked with the Selected Alternate. The active agricultural land measures approximately 49.8 acres in area, stretching between I-270 and the CSX rail lines, midway between Game Preserve Road and MD 124. Although the footprint of the secondary development is not known at this time, secondary effects to the active agricultural land from the

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LEGEND

-  MIHP District
-  MIHP Site
-  NRHP District
-  NRHP Site

For a list of the Historic Resources in the SCEA, with their corresponding mapping identification number, see Section III.B.4.g.4) f) and the Appendix

SCEA BOUNDARY

PROJECT AREA

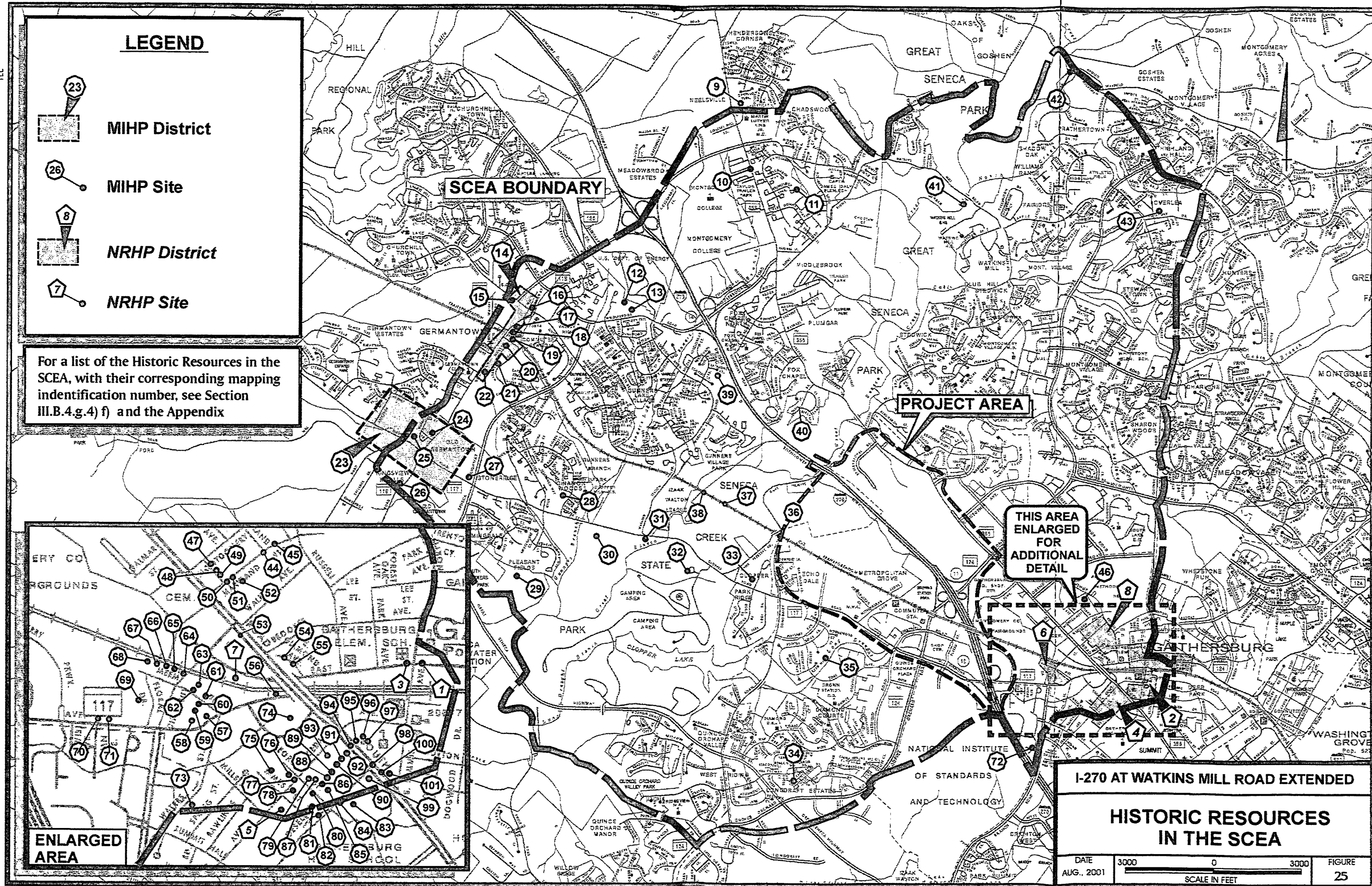
THIS AREA
ENLARGED
FOR
ADDITIONAL
DETAIL

ENLARGED
AREA

I-270 AT WATKINS MILL ROAD EXTENDED

HISTORIC RESOURCES IN THE SCEA

DATE AUG., 2001
3000 0 3000
SCALE IN FEET
FIGURE 25



Selected Alternate are expected to be substantial. However, this land is not zoned for agriculture and is planned for development in the City of Gaithersburg Master Plan.

4) Cumulative Impacts

a) Surface Waters

Surface waters included in the SCEA are located in the Great Seneca Creek watershed, the largest watershed located entirely within Montgomery County. The sub-watersheds associated with the SCEA surface waters are Middle Great Seneca, Gunners Branch, Cabin Branch, Whetstone Run, I-270 Tributary, Upper Long Draught and Lower Draught (Figure 20). Whetstone Run, Gunners Branch and Upper Long Draught each have instream impoundments, Lake Whetstone, Gunners Lake and Clopper Lake, respectively.

Montgomery County has conducted an assessment of existing stream resource conditions in its 1,500 miles of streams based on aquatic life, stream channel habitat indicators and stream chemistry measurements. The results of the countywide assessment are contained in the document entitled, "Countywide Stream Protection Strategy" (CSPS), for which data was compiled during the Summer of 1997. Much of the following discussion on SCEA surface waters is based on information contained in the CSPS.

Over time, the county's landscape has experienced several cycles of change, from extensive land clearing, farming, abandonment and natural reforestation to rapid growth, transforming the county into its present urbanized status. The early agrarian practices which resulted in deforestation and sedimentation often had severe impacts on county streams, but time and nature's resiliency permitted many streams to recover. More recent impacts to stream resources have resulted from the development of watersheds to suburban and urban land uses and the inadequately controlled or uncontrolled stormwater from the developed areas which changes the natural stream flow and causes erosion and sedimentation. As reported in the CSPS, the dominant impacts to habitat conditions and aquatic life in Montgomery County's streams were from stream erosion and sedimentation. Also, it was noted that "the severity of stream habitat loss and biological community impairment in a sub-watershed appears generally related to the extent that developed land has replaced natural land cover with impervious areas". This loss of natural land cover results in increased stormwater runoff and reduced groundwater infiltration which is detrimental to the natural stream hydrology. It is evident from the data presented earlier in this section that residential, commercial, industrial and institutional land uses increased during the period 1981 to 1997 within the SCEA boundary while agricultural and forest land have decreased. Thus, there has been a trend to convert land within the SCEA boundary to developed uses, thereby increasing the impervious area draining to streams. This trend is expected to

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continue into the future based on 2020 land use data, however, the rate at which developed land within the SCEA boundary increases is expected to slow dramatically from 75 percent during the period 1981 - 1997 to 5 percent projected for the period 1997 - 2020 (Section III.B.4.g.2.b.). The CSPS, which was compiled during the Summer of 1997, reported the following existing impervious area percentages, based on aerial photos, for the SCEA sub-watersheds.

<u>Sub-watershed</u>	<u>% Impervious</u>
Middle Great Seneca	21
Gunners Branch	23
Cabin Branch	23
Whetstone Run	33
I-270 Tributary	30
Upper Long Draught	28
Lower Long Draught	11

According to the CSPS, nearly all Montgomery County streams comply with Maryland water quality standards and criteria for dissolved oxygen, temperature and pH. Historically, this has been the case, however, the extent and diversity of biological life and stream habitat conditions vary significantly in county streams. Based on data collected through Summer 1997 and using biological indicators for fish and benthic macroinvertebrates, the CSPS has rated stream resources in the county as being in excellent, good, fair or poor condition. The SCEA sub-watersheds are rated as follows:

<u>Sub-watershed</u>	<u>Stream Biological Condition (CSPS)</u>
Middle Great Seneca	Good
Gunners Branch	Fair
Cabin Branch	Fair
Whetstone Run	Fair
I-270 Tributary	Poor
Upper Long Draught	Fair
Lower Long Draught	Good

Many areas within the SCEA boundary were developed prior to State requirements to provide stormwater management. According to the CSPS, stormwater management appears to be having positive effects mitigating, although not eliminating, impacts to streams from

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increased runoff from developing watersheds. In developed areas, stream draining areas without stormwater management appear to be more impaired than streams that are protected by stormwater management. As reported in the CSPA, "this general conclusion is most apparent in sub-watersheds having high degrees of development and corresponding levels of watershed imperviousness".

Cumulative impacts to surface waters within the SCEA boundary result from the addition of the direct impacts and secondary effects resulting from the Selected Alternate to the impacts to surface waters from other past, present and future actions. Future planned development indicated in Section III.B.4.g.2.b. would add to past and current surface water impacts through increased impervious areas and stormwater runoff. However, effects to surface waters under the future land use scenario are expected to be minor due to the current regulatory framework for stormwater management and sediment and erosion control requirements administered by the Maryland Department of the Environment (MDE).

Although not yet available for all sub-watersheds, the CSPA provides some projected percentages of sub-watershed imperviousness (the ratio of paved area to total sub-watershed area). The projected impervious area percentages are based on generalized zoning information for the sub-watersheds at the time the CSPA was compiled in the Summer of 1997. The CSPA projects the impervious area percentage of Upper Long Draught to be in the range of 30 to 55 percent and that of Lower Long Draught to be in the range of 15 to 25 percent which represent increases over their existing impervious area percentages which are 28 percent and 11 percent, respectively, based on actual ground cover from aerial photos. This provides an indication of the change in sub-watershed imperviousness between the present and future time frames. Mitigation for increased stormwater runoff would be provided through stormwater management and sediment and erosion control regulations. In addition, the CSPA has assigned a watershed management category to each sub-watershed based upon stream conditions, existing watershed development and projected land use changes. For each category, "a set of management tools is identified to address the stream conditions and levels of development anticipated. The management categories and tools provide a basis for targeting interagency resources to address stream quality problems using a focused, watershed-based approach." The CSPA is intended to provide program guidance and public awareness for improving stream resource protection and working toward achieving the County's adopted stream protection goals which include the following as listed in the Montgomery County Code:

- "Protect, maintain, and restore high quality chemical, physical, and biological conditions in the waters of the state in the county;

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- Reverse the past trends of stream deterioration through improved water management practices;
 - Maintain physical, chemical, biological, and stream habitat conditions in County streams that support aquatic life along with appropriate recreational, water supply, and other water uses;
 - Restore county streams damaged by inadequate water management practices of the past, by reestablishing the flow regime, chemistry, physical conditions, and biological diversity of natural stream systems as closely as possible."

b) Floodplains

The 100-year floodplains within the SCEA boundary occurring along Great Seneca Creek, Cabin Branch, Whetstone Run, Gunners Branch, I-270 Tributary and Long Draught Branch are indicated on Flood Insurance Rate Maps from the Federal Emergency Management Agency (FEMA).

Past stresses to floodplains within the SCEA boundary have occurred. Any unregulated encroachments on the 100-year floodplain from development would have occurred prior to the passing of the Non-Tidal Wetlands Act in 1989 which affords protection to floodplains. As indicated in Section III.B.4.g.2)b), during the period 1981-1990, substantial increases occurred in residential, commercial, industrial and institutional land uses which included roadway construction associated with the development. Montgomery Village, a large residential community located in the southeastern portion of the SCEA area, was developed in the 1980's. Current Maryland, federal and local regulations discourage development in floodplains and a Waterways Construction Permit is required for any floodplain encroachment which includes grading, filling or placing structures in the 100-year floodplain. According to information from the US Army Corps of Engineers (COE), during the period from January 1, 1980 to June 27, 2000, a total of 834 permits were requested under Section 404 of the Clean Water Act for work conducted in vegetated and non-vegetated Waters of the US throughout Montgomery County. This list includes stream impacts, wetlands and shore erosion permits. Although the COE could not provide an exact number, it was indicated that the majority of the permits likely represent stream impacts, mostly for road crossings and restoration work associated with other approved land use changes.

Past alterations to floodplains within the SCEA boundary has eliminated or reduced some of the valuable functions associated with floodplains. Since 1927, over 27,000 acres of stream valley parkland has been acquired throughout the county which has helped mitigate impacts on

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many stream floodplains. Of the floodplains associated with the streams within the SCEA boundary, substantial portions of the floodplains of Great Seneca Creek, Cabin Branch and Gunners Branch are located in parkland.

Direct impacts to the 100-year floodplain are quantified in Section III.B.4.d.3. for the Selected Alternate and total 6.4 acres. Cumulative impacts to the 100-year floodplain within the SCEA boundary result from the addition of the direct impacts and secondary effects resulting from the Selected Alternate to the impacts to 100-year floodplain from other past, present and future actions. Future development anticipated within the SCEA boundary, as indicated in Section III.B.4.g.2.b., would add to past and present impacts to the 100-year floodplain. However, effects to floodplains under the future land use scenario are expected to be minimal as a result of the current regulatory framework and given that portions of the floodplains within the SCEA boundary are located in parkland.

c) Wetlands

Based on National Wetland Inventory (NWI) mapping, the wetlands located within the SCEA boundary include the following types: palustrine forested, palustrine emergent, palustrine open water, palustrine scrub-shrub, palustrine unconsolidated shore and lake. Ecological functions provided by wetlands include filtering pollutants in surface runoff, maintaining base flow in streams and slowing flood waters.

The United States Fish and Wildlife Service (USFWS), for areas within the Chesapeake Bay Watershed, has determined that Maryland experienced a net loss of 4,810 acres of wetlands during the period 1982-1989 (Tiner et. al. 1994). According to the MDP publication, "Maryland's Land, 1973-1990, A Changing Resource", the area of wetlands in Montgomery County totaled 172 acres in 1981 and also in 1990, indicating no net change. Information obtained from the COE showed a total of 834 permit requests under Section 404 of the Clean Water Act for work conducted in vegetated and non-vegetated Waters of the US throughout Montgomery County during the period from January 1, 1980 to June 27, 2000. Permits requested include stream impacts, wetlands and shore erosion permits. Although the COE could not provide an exact number, it was indicated that the majority of the permits likely represent stream impacts with some wetland impacts. It was further indicated that in the last eight years, there have been few wetland impacts in Montgomery County, as reviewed by the COE, and most of the impacts were under one acre. Wetland trends data for the area within the SCEA boundary is not readily available.

Direct impacts to wetlands that would result from the Selected Alternate are quantified in Section III.B.4.d.5. and total 0.76 acre. Cumulative impacts to wetlands within the SCEA

boundary result from the addition of the direct impacts and secondary effects resulting from the Selected Alternate to the impacts to wetlands from other past, present and future actions. Future development within the SCEA boundary, indicated in Section III.B.4.g.2.b., would add to past and present impacts to wetlands. However, given the current federal and state regulatory framework contained in Section 404 of the Clean Water Act, the Maryland Nontidal Wetlands Protection Act and the "no net loss" wetlands policies, impacts to wetlands under the future land use scenario are expected to be minimal.

d) Woodlands

Forested areas within the SCEA boundary identified by 1997 MDP Land Use/Land Cover mapping includes deciduous, evergreen and mixed forests, as well as, brush areas. The forested areas are primarily located along the Great Seneca Park and Seneca Creek State Park.

According to the MDP publication, "Maryland's Land, 1973-1990, A Changing Resource", the area of forests in Montgomery County decreased by 8.5 percent, from 97,564 to 89,318 acres, during the period 1981-1990. Within the SCEA boundary, based on MDP mapping, the area of forests decreased by 19.2 percent, from 4,280 to 3,457 acres, during the period 1981-1997. As indicated in Section III.B.4.g.2.b., during the period 1981-1997, there were substantial increases in residential, commercial, industrial and institutional land uses within the SCEA boundary. A loss of forest area results in a loss of the valuable ecological functions associated with forests which include stabilizing soils, filtering nutrients and sediment, and regulating stormwater and stream flow.

The Maryland Forest Conservation Act of 1991 regulates forest resource impacts. Under the Act, for every 1 acre of forest cleared above a particular threshold for forest conservation, which is set depending on the zoning, 2 acres of forest must be replaced. Also, when non-forested land is developed a percentage of the land must be planted with trees. These restrictions on forest clearing and the requirements for reforestation provide a strong incentive for forest conservation.

Direct impacts to woodlands that would result from the Selected Alternate are quantified in Section III.B.4.d.5. and total 30.9 acres. Cumulative impacts to woodlands within the SCEA boundary result from the addition of direct impacts and secondary effects resulting from the Selected Alternate to the impacts to woodlands from other past, present and future actions. Future development within the SCEA boundary, indicated in Section III.B.4.g.2.b., would add to past and present impacts to woodlands. Given the current regulatory framework for forest conservation and reforestation and the fact that much of the forested area within the SCEA boundary is located in parkland, however, no major impacts to woodlands under the future land

use scenario are anticipated, particularly in light of past trends in forest loss before and after the enactment of the Maryland Forest Conservation Act in 1991. According to information from MDP, forest losses within the SCEA boundary totaled 689 acres during the period 1981-1990 while forest losses during the period 1990-1997 were reduced to a total of 134 acres within the SCEA boundary.

e) **Parklands**

Parklands and recreation areas identified within the SCEA boundary are listed below. The Selected Alternate would result in direct impacts to Seneca Creek State Park, requiring right-of-way from the publicly owned public park. The Selected Alternate would require 5.5 acres of right-of-way from parkland which represents 8.2 percent of the total right-of-way required for the Selected Alternate. In addition, the Selected Alternate would require relocation of a small portion of a hiking trail associated with Seneca Creek State Park, on the west side of I-270, due to extending a bridge pier to widen the existing bridge at this location. Impacts to parklands within the SCEA resulting from other future actions, including future development, are expected to be minimal since it would be extremely rare, if at all, that development would be permitted on public parkland. Also, use of land from a significant publicly owned public park or recreational area as part of a federally funded or approved transportation project would require a Section 4(f) evaluation to document that there are no feasible and prudent alternatives to the use of land from the park, and that the project includes all possible planning to minimize harm to the park.

Parklands and Recreation Areas Within the SCEA Boundary

Centerway Park	Izaak Walton League
City Hall Park/	Lee Street Park
Sanford W. Daily Municipal Center	Middlebrook Hill (Neighborhood Conservation Area)
Clear Spring Park	Montgomery Village Golf Course
Constitution Garden	Old Germantown Park
Diamond Farms Park	Plumgar Park
Fox Chapel Park	Robertson Park
Gaithersburg Upcounty Senior Center	Seneca Creek State Park
Germantown East Park	South Gunners Branch Park
Great Seneca Park	Stewartown Park
Gunners Branch Park	Waring Station Park
Gunners Lake Park	
Gunners Village Park	

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f) Historic Resources

An inventory of historic resources located within the SCEA boundary was compiled based on previous SHA coordination with the Maryland Historical Trust that was conducted for the I-270/US 15 Multi-Modal Corridor Study. The inventory includes listings from the National Register of Historic Places (NRHP) and the Maryland Inventory of Historic Places (MIHP). MIHP listings that also appear in the NRHP files are inventoried only once as a NRHP resource. A total of 101 historic resources (8-NRHP and 93-MIHP), which includes historic districts, are identified within the SCEA boundary and are indicated on Figure 25. NRHP resources are listed below and MIHP resources are listed in the Appendix along with their corresponding mapping identification number and MIHP number.

NRHP

<u>Map</u> <u>I.D. No.</u>	<u>Name of Historic Resource</u>	<u>MIHP No.</u>
1	Gaithersburg B&O Railroad Station and Freight	21-151
2	Old Gaithersburg Historic District	21-002
3	J.A. Belt Building	21-135
4	Observatory Heights Historic District	
5	Gaithersburg Latitude Observatory	21-141
6	Chestnut and Meem Historic District	21-178
7	Thomas and Company Cannery	21-168
8	Brookes, Russell and Walker Historic District	21-165

The Selected Alternate would not result in direct impacts to National Register or National Register eligible historic resources. Future development within the SCEA boundary could add to cumulative impacts to historic resources. However, this development would be within planned areas consistent with the local master plans and thus, any impacts to historic resources would be expected to be minimal. As a result, the Selected Alternate is not expected to influence the loss of historic properties within the SCEA boundary or accelerate the loss of historic resources as a result of cumulative development.

g) Agricultural Land

The amount of land used for farming in Maryland has been declining. The 1992 Census of Agriculture reports that 2,223,000 acres were being farmed at that time which signified a decline of more than 350,000 acres in ten years. According to "Maryland's Land: 1973 - 1990", a publication of the Maryland Office of Planning, agricultural land use in Montgomery County

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dropped to 107,654 acres in 1990, a decline of 21,108 acres during the period 1973 - 1990. The Atlas of Agricultural Land Preservation in Maryland (AALPM) indicates that many large areas of Maryland's prime and productive agricultural land are being fragmented by development.

Based on information contained in the AALPM, the agriculturally zoned land in Montgomery County is located outside of the SCEA area in the western, northern and northeastern parts of the county. Within the SCEA boundary, the land is either developed, planned for development or publicly owned land such as parks. The agricultural zoning in Montgomery County is rated "most protective", the highest category with regard to level of protection for preserving farmland based on the number of residential units that are permitted to be built on the property. Agricultural zoning that only permits one unit per 20 acres or more is rated "most protective". In Montgomery County, agriculturally zoned land permits one unit per 25 acres. The agricultural zoning in four of the 23 Maryland counties is classified as "most protective", generally the counties that have been or are subject to significant development pressure.

The AALPM reports that as a result of the Maryland Agricultural Land Preservation Foundation (MALPF) and a number of county easement programs, there has been more farmland preserved in Maryland than in any other state. Statewide, during the period 1974 - 1994, MALPF preserved over 128,000 acres of farmland. Through its local purchase of development rights (PDR) and transfer of development rights (TDR) programs, Montgomery County saved 43,314 acres which ranked the best of any local jurisdiction in America. In addition to MALPF easements and County easements, there are Maryland Environmental Trust (MET) easements and private conservation easements that protect land in Montgomery County's agricultural zone which is located outside the SCEA boundary. However, most of the easements in Montgomery County were acquired through local programs with a large percentage of the easement acquisition in the western part of the county achieved through TDR's which utilize private funds to support preservation.

The AALPM indicates development pressure on land zoned for agriculture based on the number of new dwelling units a county expects to be built between 1995 and 2020. In Montgomery County, development pressure is determined using growth projections and planning data for transportation analysis zones (TAZ) within the county. By dividing the number of acres zoned to allow residential subdivision in each TAZ by the number of dwelling units expected for that TAZ, an estimate is produced of the number of acres available to absorb each new dwelling. Using this information, the development pressure on agriculturally zoned land that is not permanently preserved is rated using one of four categories ranging from high development pressure (fewer than 5 acres available per projected dwelling unit) to minimal development

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pressure (over 50 acres available per projected dwelling unit). The agriculturally zoned land in Montgomery County is located outside the SCEA boundary and all four of the development pressure categories are present in the agricultural zone. However, there are large areas with minimal development pressure and there is much more farm land with minimal development pressure than high development pressure.

Although there have been accomplishments in agricultural preservation in Maryland, MALPF reports, based on agricultural transfer tax receipts from 1987 through 1996, that 213,762 acres of farm land were converted to other uses. According to the AALPM, in the five years from 1992 through 1996, MALPF saved 29,607 acres which represents 49 percent of the 60,019 acres lost in the state. The preservation program in Montgomery County has been certified by the Office of Planning and MALPF. The AALPM reports that protective zoning and easement acquisition appear to have combined in a timely fashion to protect much of the agricultural zone in the western portion of Montgomery County from development.

Although the agriculturally zoned land in Montgomery County lies outside the SCEA boundary, some agricultural uses are taking place on land within the SCEA boundary that is zoned other than agriculture. According to estimates contained in the AALPM for Montgomery County, approximately 25,600 acres are in agricultural use on land not zoned for agriculture. Within the SCEA boundary and the heavily urbanized county as a whole, land used for agriculture that is not zoned for agriculture appears as small fragmented areas surrounded by development zones. Few of these areas appear in the agricultural reserve of Montgomery County where preservation efforts have been taking place and there is a heavy concentration of easements.

The Selected Alternate would not result in direct impacts to prime farmland. Also, the agriculturally zoned land in Montgomery County lies outside the SCEA boundary. However, the Selected Alternate would directly impact active agricultural land that is zoned other than agriculture in two locations - between I-270 and MD 355, south of Professional Drive, and between I-270 and the CSX rail lines, north of MD 124. Direct impacts to active agricultural land from the Selected Alternate would total approximately 10.5 acres. Cumulative impacts to agricultural land within the SCEA boundary result from the addition of the direct impacts and secondary effects resulting from the Selected Alternate to the impacts to agricultural land from other past, present and future actions. However, land within the SCEA boundary is either developed, planned for development or publicly owned land such as parks. Thus, agricultural land within the SCEA boundary that would be impacted by future development or directly impacted by the Selected Alternate is land that is not zoned for agriculture and is already planned for development.

5) Conclusions

Direct impacts on the environment from the Selected Alternate are added to other past, present and future actions to arrive at cumulative impacts. The Selected Alternate would result in direct impacts to surface waters, 100-year floodplains, wetlands, woodlands and parkland. Direct impacts to National Register or National Register eligible historic resources would not result from the Selected Alternate. Prime farmland would not be directly impacted by the Selected Alternate, however, active agricultural land would be impacted. A description of direct impacts to the SCEA resources has been included in the previous discussion of cumulative impacts. Direct impacts have been quantified in detail in Section III.B.4.d.

Secondary effects to natural resources are expected to result from the Selected Alternate. Potential development in an area located south of Game Preserve Road between I-270 and the MARC/CSX rail lines is linked to transportation improvements associated with the I-270/Watkins Mill Road Extended project as described in the City of Gaithersburg Master Plan. Secondary effects to surface water in this area that could result from increased impervious area from development would impact the I-270 Tributary. This stream resource is currently rated as having a poor biological condition based on stream assessments by Montgomery County. Secondary effects to floodplains and wetlands are expected to be minimal. While the potential exists, no major impacts to woodlands from secondary development are expected since the majority of development in the above described area can occur under the No-Build scenario, not as a secondary effect of the Selected Alternate. Secondary effects to parklands and historic resources are not anticipated. Secondary effects to active agricultural land that is planned for development are expected to be substantial.

Cumulative effects to natural resources within the SCEA boundary are the result of impacts to resources from other past, present and future actions in addition to the direct impacts that would result from the Selected Alternate. Surface waters, floodplains, wetlands and woodlands have all historically been impacted by development within the SCEA boundary and would be further impacted by the Selected Alternate. Impacts to these resources from other future actions within the SCEA boundary would add to the overall cumulative effect. Impacts to surface waters from other future actions are expected to be minor, partly due to the Countywide Stream Protection Strategy, which provides a means of managing watersheds to address stream conditions and levels of development anticipated, as well as, increasing public awareness on issues concerning stream resources. Floodplain impacts from other future actions within the SCEA boundary are expected to be minimal since major portions of the floodplains are located in parklands. Impacts to wetlands from other future actions are expected to be minimal as a result of the current regulatory framework and "no net loss" policies". No major impacts to

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woodland from other future actions are expected since much of the forested area within the SCEA boundary is located in parklands and forest losses have declined in light of conservation requirements. Impacts to parklands from future development within the SCEA boundary are expected to be minimal. Impacts to historic resources from other future actions are expected to be minimal. Agricultural land within the SCEA boundary that would be impacted by future development is land that is not zoned for agriculture and is already planned for development.

Overall, in the context of the current federal, state and local regulatory framework, future cumulative effects to resources are expected to be minor. Protection of natural and cultural resources would be facilitated through permitting, planning and zoning, and approval processes that are conducted by those agencies that regulate potential effects to resources.

C. Summary of Public Involvement

The State Highway Administration has met with citizens to discuss the I-270 Watkins Mill Road Extended Project on several occasions in the form of workshops, focus group meetings that were open to the public and a public hearing. There were also several meetings of a less formal nature, where SHA representatives met with local citizens that SHA knew were likely to be affected by alternates that had been developed.

- SHA has sponsored one public workshop thus far for this project. An Alternates Public Workshop was held at the Activity Center at Bohrer Park in Gaithersburg, Maryland on November 23, 1999 where 50 people attended. The purpose of this workshop was to familiarize citizens with the study by presenting the purpose and need for the project, publicly presenting the preliminary alternates under consideration, and to also provide an opportunity for public participation in the planning process. Preliminary Alternates 2, 2-I, 3, 3-I, 4 and 5 were presented along with Access Options A, B and C. The discussion concentrated on traffic and safety concerns, environmental concerns, accessibility, and suggestions for the alternates. Some of the traffic and safety concerns included the traffic impacts on Montgomery Village streets, on Thomas Farm, and to Game Preserve Road, as well as traffic safety implications near the schools. Environmental concerns included impacts on noise abatement, trees and stream flow. The public raised interest in pedestrian and bicycle accessibility with recommendations for safety modifications and landscaping.
- There have been six Focus Group Meetings held for this project. The Focus Group consists of approximately ten members of business and community representatives in the project area. At the meetings, there were representatives from the State Highway Administration, The Wilson T. Ballard Company, the City of Gaithersburg,

Montgomery County, Woodland Hills Home Owners Association (HOA), Montgomery Meadows Home Owners Association, Orchard Hills Civic Association, Montgomery Village Foundation, IBM, Wells and Associates, Gaithersburg Planning Commission, and Casey Management.

- On November 10, 1999 the Focus Group met to discuss the project development process, the project purpose and need, environmental issues, the preliminary alternates under consideration, and the upcoming Alternates Public Workshop. The mission of the focus group, the composition of the group and the tentative project schedule was also included in the discussion.
- On February 8, 2000, the Focus Group met to discuss the comments from the Alternates Public Workshop, the alternates recommended to be retained for detailed study, the environmental issues, the traffic analyses, and the upcoming steps in the study. The discussion included a summary of general feedback from the citizens that attended the November 23, 1999 Alternates Public Workshop. However, the main purpose of the meeting was to gain an understanding of the project alternates that have been recommended to be retained for detailed study. To address environmental issues, a summary of each alternate and the impacts associated with each, was provided. Right-of-way, wetlands, floodplains, and stream relocations were among the primary environmental concerns. An overview of the traffic issues and a comparison of traffic volumes at key locations with each alternate were also included in the discussion. It was concluded that the next steps in the study would include detailed traffic analyses, air and noise analyses, archeology studies and detailed engineering studies.
- On May 9, 2000, the Focus Group met to review issues associated with a few of the alternates that were retained for detailed study, and to discuss ongoing and upcoming project activities. Alternates 1, 2, 3, 4, and 6, along with Access Options A, B, and C, were displayed for discussion. The discussion focused on the environmental issues raised by the federal and state regulatory agencies. In order to avoid or minimize impacts to streams and wetlands, Alternates 2-1 and 5 will be further investigated as options to Alternates 2 and 3. In discussing traffic and engineering issues, the group reviewed the typical sections and intersection proposals based on level of service analysis for the design year of 2020. It was noted that, for the alternates, the secondary and cumulative effects analysis would be completed in time for the next Focus Group Meeting (September 2000).

- On September 26, 2000 the Focus Group met to review all of the detailed alternates and options, to review the traffic and environmental benefits and impacts including secondary and cumulative effects, and to discuss ongoing and upcoming project activities such as the December Public Hearing. Detailed engineering plans were presented for Alternates 1, 2, 2A, 3, 4, 4A, 6 and 6A. Access Options A, B and C and Avoidance/Minimization Options - Western C-D Shift and Mainline Eastern Shift were also discussed. An overview of the upcoming public hearing was given, informing everyone that displays will be available for review and there will be opportunity to provide comments. The Focus Group stressed that traffic calming is critical. The group also discussed the importance of the city and county making a commitment to the traffic calming measures if a build alternate is selected.
- On March 1, 2001, the Focus Group met to discuss the recent public hearing and follow-up community involvement activities, to review revisions to the alternates and present the results of additional traffic studies, to evaluate the benefits and impacts of the alternates, and to continue the process of selecting a preferred alternate. It was pointed out that the majority of speakers at the public hearing were local residents in favor of Alternate 1 or Alternate 6. A brief summary was given of the January 29, 2001 Gaithersburg City Council Work Session and the February 6, 2001, presentation to the Montgomery Village Foundation. At both meetings, many local residents spoke against an interchange. Montgomery Village residents felt that an interchange would accommodate large developments at the expense of local residents. Some focus group members felt that the proposed interchange would encourage drivers to use Watkins Mill Road east of MD 355 as a through street which might increase traffic near the schools, encourage speeding and result in Watkins Mill Road being widened in the Montgomery Village neighborhood. It was explained that traffic calming measures along Watkins Mill Road and Pheasant Run Drive are under consideration by the City of Gaithersburg. Also, Watkins Mill Road traffic levels are expected to drop east of MD 355 and Watkins Mill Road would only be widened for a few hundred feet east of the MD 355 intersection as part of the intersection improvements. It was suggested to study measures at the Watkins Mill Road/MD 355 intersection to prevent through movements across MD 355 in both directions. Focus group members felt this might discourage drivers east of Montgomery Village from using the residential segment of Watkins Mill Road as a through street to gain access to the interstate. It was pointed out that

Montgomery Village residents would therefore trade their fast interstate access at the Watkins Mill Road interchange in exchange for lower traffic levels in their neighborhood. Also, increased traffic and delays may result at the MD 355/MD 124 intersection and the I-270/MD 124 interchange, which are already experiencing failing levels of service. A presentation was made of the alternates and access options under consideration by SHA, pointing out that some have been revised since the public hearing to reduce environmental, right-of-way and traffic impacts to local communities. Alternate 3 Revised was presented to the Focus Group as the alternate that would most likely be the SHA preferred alternate, pending further coordination with the City of Gaithersburg and Montgomery County and a decision by the Deputy Administrator. It was pointed out that Alternate 3 Revised is compatible with C-D lanes, does not require any residential displacements and has less than one acre of wetland impacts. However, due to its high cost, Alternate 3 Revised would probably have to be constructed in stages. It was explained that SHA was in the process of selecting a preferred alternate to present to the SHA Administrator and the study team feels Alternate 3 Revised is the best overall alternate, but the cost issues and City of Gaithersburg issues would need to be addressed.

- On April 5, 2001, the Focus Group met to review recent activities regarding traffic analysis and to continue discussion regarding the selection of an SHA recommended alternate. A brief summary was given of the study team's most recent public and agency involvement efforts as described below. At the March 12 Gaithersburg City Council worksession, many local residents spoke against an interchange but local business owners and developers strongly supported a full interchange. At the worksession, the Mayor of Gaithersburg unofficially endorsed Alternate 3 Revised and the City Council voted 4 - 1 in a straw poll in favor of Alternate 3 Revised. At the March 19 DNR coordination meeting, DNR representatives unofficially stated that they were not interested in annexing the stream tributary corridor along southbound I-270 into Seneca Creek State Park because it is of poor quality and is not contiguous with the parkland. At the March 27 Montgomery Village Foundation meeting, representatives wanted the City of Gaithersburg to commit to traffic calming even before interchange construction takes place. At the March 27 meeting with Montgomery County Department of Public Works and Transportation officials, County representatives expressed concerns about the local developers' proposed access points on Watkins Mill Road Extended and how these access points worked in relation to the interchange configuration. On April 5, study team members toured

the four Montgomery Village schools on or near Watkins Mill Road with Montgomery Village Foundation and School Board representatives to study the afternoon traffic patterns at the schools' dismissal times. Results of the study team's most recent traffic studies were presented to the Focus Group showing that traffic levels are expected to drop on Watkins Mill Road east of MD 355. It was explained that the Watkins Mill Road traffic levels displayed at the public hearing only applied to the segment near the interchange. Study team members reinforced to the Focus Group that traffic calming measures along Watkins Mill Road and Pheasant Run Drive are under consideration by the City of Gaithersburg to reduce traffic and discourage speeding. Many focus group members stated that the city should install some traffic calming measures now as short-term improvements before the extension or interchange is constructed, instead of waiting for traffic in Montgomery Village to worsen as a result of the future construction. The alternates and access options that are under consideration by SHA were briefly discussed with the focus group. It was noted that the Montgomery Village Foundation, the Caulfield community and many local residents continue to support Alternate 1. It was explained to the Focus Group that on April 3, the study team presented Alternate 3 Revised to the SHA Administrator as the Draft SHA Recommended Alternate. The study team feels Alternate 3 Revised is the best overall alternate. A brief overview was given of the upcoming milestones in the project's schedule.

- A Location/Design Public Hearing was held on January 16, 2001, at the Activity Center at Bohrer Park in Gaithersburg, Maryland. The following were presented to the public for review and formal testimony: seven build alternates for the extension of Watkins Mill Road between MD 355 and MD 117, including an overpass of I-270, with five of the seven alternates providing general use interchanges; three avoidance/minimization options to minimize impacts to Great Seneca Creek and Seneca Creek State Park, and three access options that could be considered in conjunction with any build alternate. Comments included: support of Alternate 6 or Alternate 1, opposition to Access Option B, support of Alternate 4, a request for striped bike lanes on Watkins Mill Road Extended and concern that an I-270/Watkins Mill Road interchange will greatly increase traffic on Watkins Mill Road within Montgomery Village and decrease safety at four schools in Montgomery Village.

D. Positions Taken

Approximately 60 citizens attended the public hearing. Nineteen individuals gave testimony, including an elected official and representatives of businesses and civic groups. The comments that were received are summarized below:

Elected Officials

Delegate Paul Carlson, Maryland House of Delegates indicated that he attended the public hearing to listen to the concerns of the community.

Businesses

Shulman, Rogers, Gandal, Pordy and Ecker, P.A. indicated that the local genetics companies that they represent supported a full interchange and did not support Access Option B (Metropolitan Court Extended) because of its adverse impacts on parking at several of these companies.

DiGene Corporation opposed Access Option B because of impacts to their property including possibly eliminating 122 of their 266 parking spaces and this option would prevent any future expansion of their company. The corporation also opposed widening of West Watkins Mill Road because of right-of-way impacts to their property.

Civic Groups

The Montgomery County Bicycle Action Group supported the off-road hiker-biker facility and requested provision of striping on Watkins Mill Road Extended for on-road bicycle lanes because experienced cyclists prefer to ride in the street.

The Montgomery Village Citizens Coalition indicated that an interchange of I-270 at Watkins Mill Road Extended will greatly increase traffic on existing Watkins Mill Road within the Montgomery Village community and decrease safety at four schools in Montgomery Village. They also indicated that Montgomery Village was not included in the study area. They requested that the Corridor Cities Transitway be constructed and local roads improved before the area around the proposed interchange is developed. The coalition was in favor of the No-Build Alternate or Alternate 6.

The Montgomery Meadows Homeowners Association indicated satisfaction that the public has been adequately informed and the environmental concerns of the study have been

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addressed. They requested studying traffic calming measures, such as islands, on Travis Avenue because of speeding problems on Watkins Mill Road.

The Windbrook Condominium Association supported the No-Build Alternate. They indicated that drivers already speed on Watkins Mill Road within Montgomery Village and an interchange of I-270 at Watkins Mill Road Extended will worsen the problem. They were concerned about safety at the four schools on Watkins Mill Road in Montgomery Village. Also, the association indicated that Watkins Mill Road Elementary School contains a large minority population.

The Citizens to Save West Valley Park indicated that construction of an interchange is not compliant with Smart Growth policies. They felt that the environmental impact from the build alternates is too great and suggested that the land west of I-270 that is slated for development be used instead as an expansion of Seneca Creek State Park. They questioned the meaning of a streamlined environmental process and indicated that other local roads should be improved instead. They favored the No-Build Alternate.

Citizens

Two individuals were concerned about impacts to the Caulfield community on Game Preserve Road, stating that the community has been impacted by previous projects, such as I-270 widening, PEPCO transmission lines and Seneca Creek State Park.

Three individuals were concerned that the Caulfield community has not been represented on the study's focus group.

One individual felt that the proposed Watkins Mill Road Extended alignment does not follow the master plan.

Two individuals questioned the need for improvements to the Metropolitan Grove MARC Station with one individual stating that the station is ineffective while the other individual felt that there is no proof that improved access to the station is needed or that the interchange will increase MARC usage.

One individual indicated that the Metropolitan Grove MARC Station is underutilized because MARC rail service is inconvenient, not because the station is inaccessible, but felt that better access to the station could be provided through the SHA maintenance facility.

One individual indicated that an interchange is not necessary to serve the Metropolitan Grove MARC Station because Montgomery Village Avenue can be used to access the station.

One individual suggested that a full interchange at Watkins Mill Road Extended may not be necessary because most commuters using the Metropolitan Grove MARC Station are coming from the north.

One individual suggested that the existing partial interchanges at I-270/MD 124 and I-270/MD 117 should be made into full interchanges instead of providing an interchange at I-270/Watkins Mill Road.

Four individuals supported the No-Build Alternate.

One individual indicated that a full interchange at Watkins Mill Road would increase traffic on existing Watkins Mill Road and it would not decrease traffic on other local roads, such as Montgomery Village Avenue or at intersections, such as MD 355/MD 124.

Seven individuals were concerned that the increased traffic on Watkins Mill Road from an interchange at I-270/Watkins Mill Road Extended will decrease safety at (four) schools in Montgomery Village. Two of the individuals opposed any interchange at I-270/Watkins Mill Road Extended and stated that speeding on Watkins Mill Road is already a problem, especially since the speed limit was raised from 25 mph to 35 mph.

One individual supported Alternate 4.

One individual felt that the purpose of the project is to serve developers, at the expense of local residents and proposed using the land in the northwest quadrant of the interchange currently proposed for development as an extension of Seneca Creek State Park. It was suggested that a build alternate would increase ambient noise, decrease property values and cause drainage problems.

One individual suggested that Montgomery Village should be included in the study area and also questioned whether stormwater management has been addressed.

One individual was concerned about the project's environmental impacts to local wildlife, especially bluebirds, in the vicinity of Game Preserve Road.

Two individuals supported Alternate 6.

One individual indicated that a full movement interchange would require the displacement of his family.

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IV. SECTION 4(f) EVALUATION

IV. SECTION 4(f) EVALUATION

A. Introduction

Section 4(f) of the Department of Transportation Act of 1966, now codified (49 U.S.C. 303(c)), essentially states that the U.S. Secretary of Transportation shall not approve any program or project which requires the use of land from a publicly owned public park, recreation area, wildlife or waterfowl refuge (as determined by the officials having jurisdiction over the resource) or historic site unless there is no feasible and prudent alternative to the use of the project resource and that the proposed action includes all possible planning to minimize harm to the property. This documentation has been prepared in accordance with 23CFR771.135 and is consistent with the criteria for a Section 4(f) Evaluation discussed therein.

This evaluation discusses proposed impacts to a publicly owned public park - Seneca Creek State Park. The impacts to the park would occur as a result of proposed improvements included in the Selected Alternate which consists of the extension of Watkins Mill Road and a full diamond interchange with I-270. The proposed improvements would improve traffic operations and accommodate planned growth in the project area. Seneca Creek State Park is traversed by I-270 and is located in the northern extremity of the project area.

B. Description of Proposed Action

The I-270 at Watkins Mill Road Extended project area is located in the northern portion of the City of Gaithersburg in Montgomery County, Maryland. Existing Watkins Mill Road is a discontinuous collector road which extends east from MD 355 (0.6 mile north of MD 124). It also includes a 1,200 foot long segment, known as West Watkins Mill Road, that extends east from MD 117 (0.75 mile north of MD 124) and dead ends just west of the CSX rail lines. The resulting gap in Watkins Mill Road is approximately 1.0 mile long, across I-270.

The purpose of the I-270 project at Watkins Mill Road Extended is to provide improved access (vehicular, pedestrian, bicycle and transit) to and from the transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas (Priority Funding Areas) of northern Gaithersburg. In addition, it is important to improve access to the Metropolitan Grove MARC Station to facilitate increased transit use.

Full build out of properties along Watkins Mill Road in the project area is not possible without the extension of Watkins Mill Road between MD 355 and MD 117. However, much of this development is being approved and will need improved access and mobility within the

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existing transportation system. This development includes: office/research development (2.3 million square feet of new development and 2.3 million square feet of re-development), commercial development (440,000 square feet of retail space, an 80,000 square foot theater complex, and a hotel), and residential development (1,500 units) are planned for the northern portion of the City of Gaithersburg. Both the City of Gaithersburg and Montgomery County have designated this project as a transportation priority.

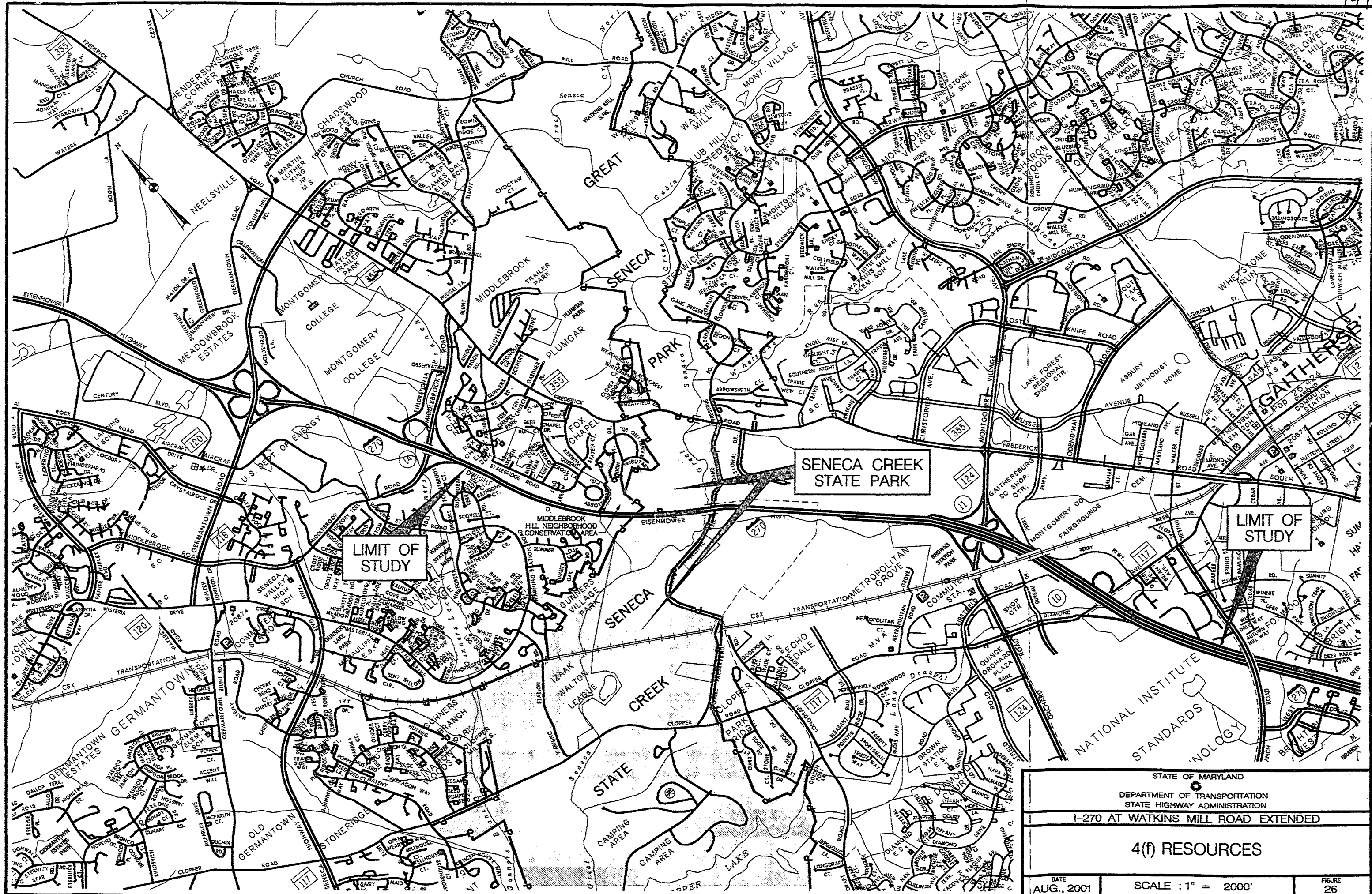
In 1997, the segment of I-270 in the project area experienced failing levels of service in the peak hours, particularly at the I-270/MD 124 interchange. In addition, the existing roads within the project area lack the capacity and continuity to provide adequate accessibility to the planned development area. Full development as proposed by the City of Gaithersburg and the Montgomery County governments would overload the existing local transportation network. In addition, the accident rate along I-270, in the vicinity of MD 124, is significantly higher than the statewide average for similar roadways and is expected to worsen as congestion increases.

The Selected Alternate would improve traffic operations for locally oriented traffic in the project area. The proposed improvements, including the extension of Watkins Mill Road and a full diamond interchange with I-270, address safety and capacity requirements in order to alleviate existing deficiencies while accommodating projected traffic increases resulting from planned growth in the area. A detailed description of the Selected Alternate can be found in Section III of this document.

C. Description of 4(f) Resources

Seneca Creek State Park

Seneca Creek State Park is located in the northern extremity of the project area and is traversed by I-270 in the vicinity of Game Preserve Road (Figure 26). A Maryland Department of Natural Resources owned facility, Seneca Creek State Park is a public recreational resource considered to be of major regional significance. The facilities provide a wide diversity of day use recreational opportunities that include hiking and nature study, bicycling and mountain biking, equestrian use, boating and fishing, picnicking, playgrounds, disc golf, baseball and multi-use athletic fields. DNR is considering developing a hiker/biker trail that will pass under I-270 along Seneca Creek to connect the state park with M-NCPPC property upstream. Depending on the demand, additional recreational development in the future in the vicinity of I-270 is possible such as, providing day use facilities on parkland adjacent to the Middlebrook Hill and Fox Chapel communities. Seneca Creek State Park is comprised of multiple parcels of land. Two parcels adjacent to I-270 were acquired with funds from the Land and Water Conservation Fund. Other parcels were acquired using Program Open Space funds. (See Section VI.



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Correspondence, pages VI A-71 through VI A-75.) Seneca Creek State Park extends from the Potomac River to MD 355, a distance of approximately 15 miles and encompasses over 6,200 acres.

It should be noted that Middlebrook Hill Neighborhood Conservation Area, an M-NCPPC facility which is approximately 115 acres in size, located on the east side of I-270 adjacent to and north of Seneca Creek State Park (Figure 26), is a 4(f) property, but it is not impacted by the Selected Alternate.

D. Impacts to 4(f) Property

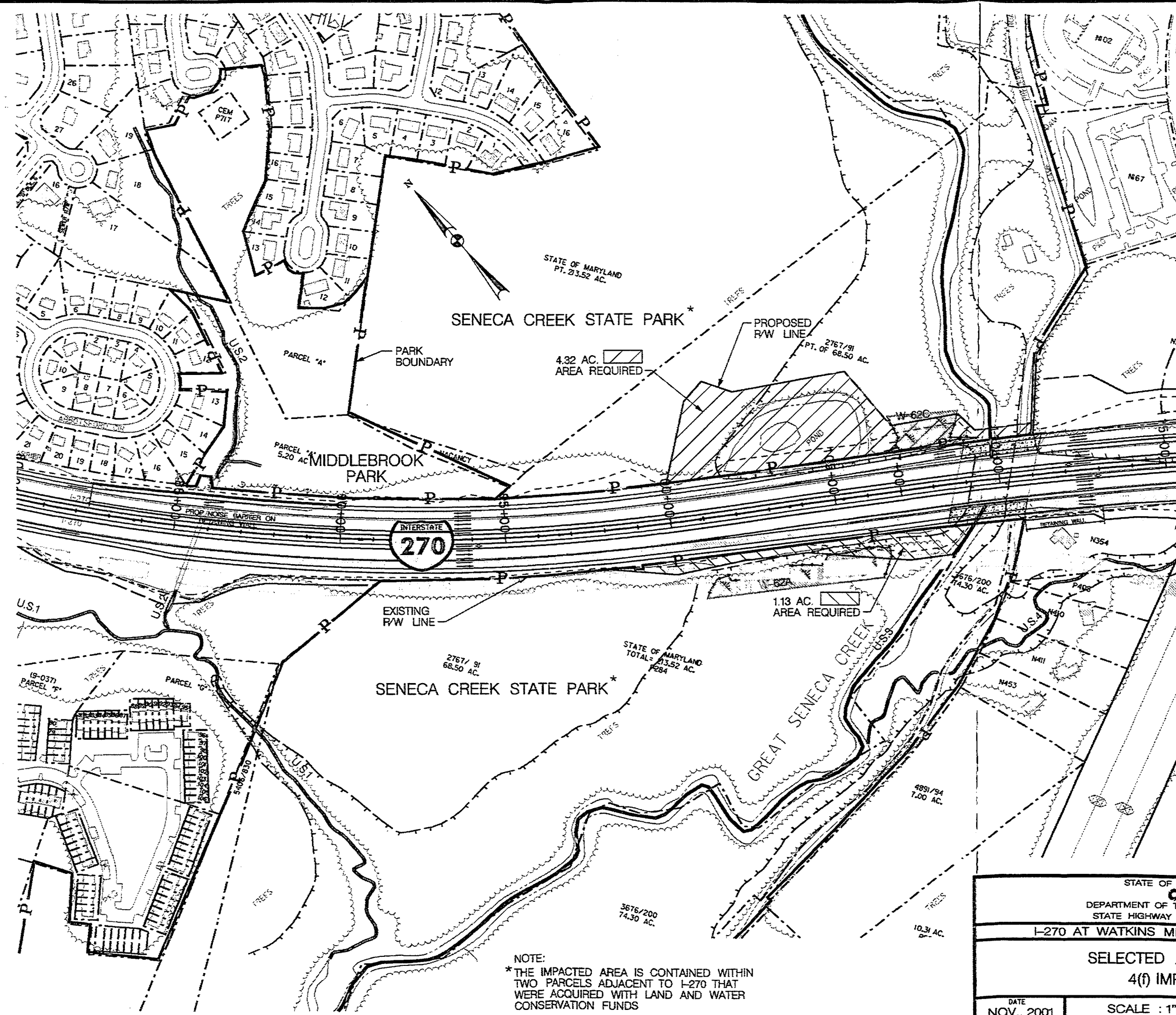
The Selected Alternate includes the extension of Watkins Mill Road between MD 117 and MD 355 and a full diamond interchange with I-270. The proposed extension of Watkins Mill Road does not impact any 4(f) properties. Impacts to Seneca Creek State Park, a 4(f) property, that would result from the Selected Alternate are described below.

The only impacted amenity associated with Seneca Creek State Park is a set of wooden steps leading to a hiking trail. The wooden steps traverse rip rap supporting Game Preserve Road and are located within the existing SHA right-of-way for I-270, along the southbound side of I-270 (west side) next to the pier for the I-270 structure over Seneca Creek/Game Preserve Road. The Selected Alternate requires this structure to be widened in the southbound direction (west side) and will likely require relocating the steps and a small portion of the hiking trail.

The Selected Alternate would not cause a major increase in noise or visually impact the Seneca Creek State Park. The noise analysis confirms that there is less than a 3 decibel (dBA) increase in build vs. no-build noise levels for the design year 2020. Furthermore, the topography of this area is such that the park is lower than I-270; so widening I-270 would result in the same visual impact as existing, only the footprint of the roadway embankment would be up to 50 feet wider on each side of I-270.

The Selected Alternate proposes a diamond configuration on both sides of I-270 and would use a two-lane barrier separated C-D roadway system on the east side of I-270 and a two-lane painted C-D roadway system on the west side of I-270. Braided ramps would be used in the southwest quadrant of the interchange because of inadequate weaving distance along southbound I-270. Construction of the Selected Alternate would require the acquisition of right-of-way from within the park boundaries of Seneca Creek State Park, on the east and west sides of I-270 (Figure 27). The right-of-way required would consist of the following areas adjacent to I-270:

Seneca Creek State Park	-	4.32 acres (east side of I-270)
	-	1.13 acres (west side of I-270)



NOTE:
* THE IMPACTED AREA IS CONTAINED WITHIN TWO PARCELS ADJACENT TO I-270 THAT WERE ACQUIRED WITH LAND AND WATER CONSERVATION FUNDS

STATE OF MARYLAND		
DEPARTMENT OF TRANSPORTATION STATE HIGHWAY ADMINISTRATION		
I-270 AT WATKINS MILL ROAD EXTENDED		
SELECTED ALTERNATE 4(f) IMPACTS		
DATE NOV., 2001	SCALE : 1" = 300'	FIGURE 27

The right-of-way required from Seneca Creek State Park on the east side of I-270 would use land from the park to provide the proposed two-lane C-D road, mostly for an area for stormwater management, as well as the necessary roadway supporting slopes. It is anticipated that the existing stormwater management pond along northbound I-270 would require reconstruction and possibly enlargement with the Selected Alternate. On the west side of I-270, the right-of-way required from Seneca Creek State Park would use land from the park to provide the proposed two-lane C-D road, mostly for the necessary roadway supporting slopes.

E. Avoidance Measures

Introduction

Avoidance measures were considered and are presented herein in two general categories: stand-alone alternates and modifications to the Selected Alternate. As presented below, among the Alternates Retained for Detailed Study, four stand-alone alternates -- No-Build, Alternate 3 with Northbound Braided Ramps, Alternate 4 and Alternate 6 -- could avoid Section 4(f) impacts.

In addition, Section 4(f) avoidance was evaluated from the standpoint of design modifications to the Selected Alternate.

It has been demonstrated, through traffic analyses associated with this study as well as the I-270/U.S. 15 Multi-Modal Corridor Study, that a two-lane C-D road is necessary in both directions of I-270 in the study area in combination with the existing eight lane mainline section. The basic footprint of such a section exceeds the width of the existing right of way despite any practicable measures to reduce the roadway width. Therefore, modifications to the Selected Alternate are presented in this document only for the purposes of minimizing harm to Section 4(f) resources.

No-Build Alternate

This alternate consists of routine maintenance, minor construction projects and developer-based improvements associated with new developments. These minor improvements would not be expected to affect roadway capacity, safety, or accessibility to the growth areas of northern Gaithersburg.

The No-Build Alternate would provide no transportation improvements to the project area and therefore, would not satisfy the project's purpose and need of providing improved vehicular, pedestrian, bicycle and transit access to and from the transportation network and improving access to the Metropolitan Grove MARC Station.

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**Alternate 3 w/Northbound Braided Ramps Alternate
(Figure 28)**

This alternate would be identical to Alternate 3 (Full Diamond Interchange - See Section III.B.1.d.) for the southbound (west) side of I-270. The northbound (east) side of I-270 for this alternate consists of three successive entrances to I-270. The first entrance would be from MD 124, and would require a grade separation from the C-D road. The second entrance would be from the C-D road and the third from the extension of Watkins Mill Road. All entrance ramps would consist of an 800-foot acceleration lane and 300-foot taper.

This is the only avoidance interchange alternate that would provide a full range of movements to and from I-270. However, while this alternate would avoid impacts to 4(f) property, it would require a substantially greater amount of stream relocation and would affect a larger linear footage of Waters of the U.S. as compared to the Selected Alternate or the other avoidance/minimization measures (see Table 17). In addition, this alternate would not include Collector-Distributor (C-D) roadways and therefore, would not be compatible with the I-270/U.S. 15 Multi-Modal Corridor Study's typical section providing C-D roadways in each direction.

**Alternate 4: Partial Interchange
(Figure 29)**

The partial interchange concept (See Section III.B.1.e) consists of a partial diamond interchange at I-270 and Watkins Mill Road Extended. Movements would only be allowed from Watkins Mill Road Extended to northbound I-270 and from southbound I-270 to Watkins Mill Road Extended. As part of the I-270/U.S. 15 Corridor Study, an additional general use lane on the I-270 would be required for capacity reasons on the southbound (west) side if no southbound C-D lanes are added. That additional general use lane is assumed as part of this alternate.

Alternate 4 would not provide all of the traffic movements between I-270 and Watkins Mill Road and therefore, would not adequately address the project's purpose and need of providing improved vehicular, pedestrian, bicycle and transit access to and from the existing and planned development transportation network and improving access to the Metropolitan Grove MARC Station. The traffic operational benefits with regard to interstate accessibility and reduced congestion would be substantially less with this alternate as compared to a full movement interchange. Traffic projections indicated that the traffic not carried by the missing ramps would divert to MD 117 and MD 124, increasing traffic congestion on these road segments, which are expected to have failing levels of service in 2020. In addition, FHWA and area citizens registered concerns about constructing another partial interchange on I-270 so close to the three other partial interchanges located at Middlebrook Road, MD 124 and MD 117.

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TABLE 17
I-270 AT WATKINS MILL ROAD EXTENDED
SUMMARY OF IMPACTS - SELECTED ALTERNATE
AND
POTENTIAL AVOIDANCE/MINIMIZATION ALTERNATES

	ALTERNATE						
	NO-BUILD 1	SELECTED ALT. 3 REV.	NORTH-BOUND BRADED RAMPS	4	4A	6	6A
Socio-Economic Environment							
1. Displacements							
a. Residential	0	0	0	0	0	0	0
b. Business/Commercial	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
2. No. of Properties & Resources Affected							
a. Residential	0	12	8	8	8	7	7
b. Business/Commercial	0	24	26	22	23	14	22
c. Parkland or Recreation Area	0	2*	0	0	1	0	1
d. Church/School	0	0	0	0	0	0	0
e. Historic/Archeological	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Total	0	38	34	30	32	21	30
3. Right-of-Way Required - Acres							
a. Residential	0	3.9	15.5	15.6	15.6	0.4	0.4
b. Business/Commercial	0	58.2	48.5	31.8	37.7	25.8	32.6
c. Parkland or Recreation Area	0	5.45	0	0	0.8	0	0.8
d. Church/School	0	0	0	0	0	0	0
e. Historic/Archeological	0	0/0	0/0	0/0	0/0	0/0	0/0
Total	0	67.55	64.0	47.4	54.1	26.2	33.8
4. Consistent With Area Land Use Plans	0	Yes	Yes	Yes	Yes	Yes	Yes
Natural Environment							
1. Number of Stream Crossings	0	9	9	7	7	3	5
2. 100-Year Floodplain Affected - Acres	0	6.4	3.21	0.90	2.10	0.40	1.60
3. Wetlands Affected - Acres	0	0.76	0.36	0.34	0.54	0.32	0.52
4. Water of the U.S. Affected - Other Than Wetlands - LF	0	1800	3585	1455	1675	840	1060
5. Woodlands Affected - Acres	0	28.5	21.8	19.8	21.8	12.0	15.6
6. Stream Relocations - LF	0	175	2290	160	320	0	160
7. Affected Threatened or Endangered Species	0	0	0	0	0	0	0
8. Area of Prime Farmland Affected	0	0	0	0	0	0	0
Noise							
Number NSAs Exceeding Abatement Criteria or Increasing 10 dBA or More Over Ambient	0	2	2	2	2	2	2
Air Quality							
CO Violations of 1-Hour or 8-Hour Standards	0	0	0	0	0	0	0
Cost (x \$1,000,000)	0.0		78	49	78	34	66

*The Selected Alternate would impact only one park, Seneca Creek State Park, which is traversed by I-270. The Selected Alternate would impact Seneca Creek State Park on both the east side and west side of I-270.

Alternate 6: Watkins Mill Road without Interchange (Figure 30)

This alternate (See Section III.B.1.g.) consists of the extension of Watkins Mill Road from MD 117 east across I-270 and connecting to MD 355 as a 4-lane arterial. It is included in the "no-build" or "baseline" scenario for the Metropolitan Washington Council of government's travel demand model for the Washington region in the Constrained Long Range Plan (CLRP). This alternate does not include a conventional interchange of Watkins Mill Road and I-270 with access for general use traffic.

Alternate 6 would not provide any vehicular access from Watkins Mill Road to or from I-270 and therefore, would not adequately address the project's purpose and need of providing improved vehicular, pedestrian, bicycle and transit access to and from the existing and planned development transportation network and improving access to the Metropolitan Grove MARC Station. In addition, although Alternate 6 might minimize traffic congestion at the Watkins Mill Road tie-in points on MD 117 and MD 355, it would not address traffic congestion at other points in the study area overall, such as the I-270/MD 124 interchange, the MD 355/MD 124 intersection or the MD 117/MD 124 intersection.

F. Measures to Minimize Harm

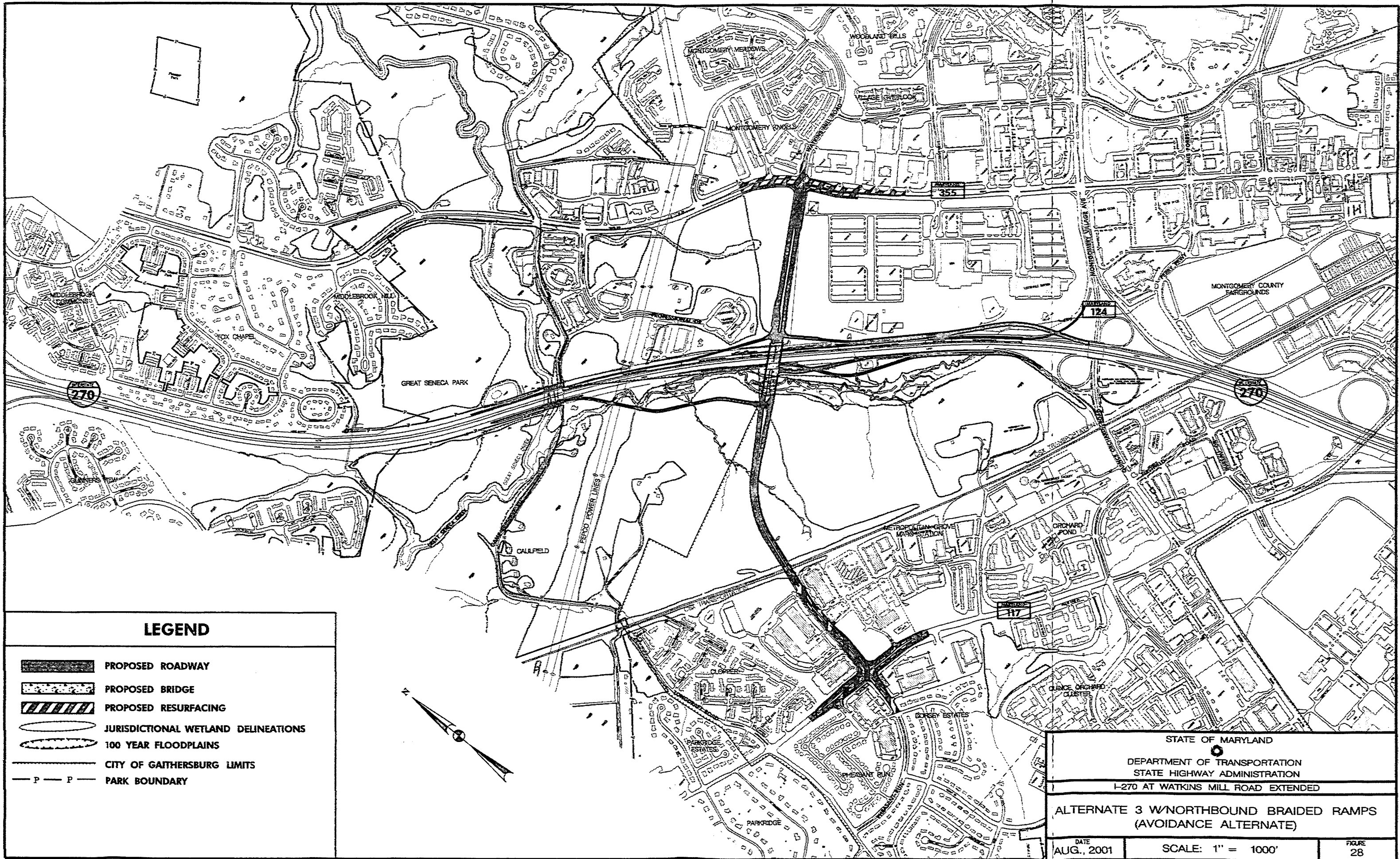
Introduction

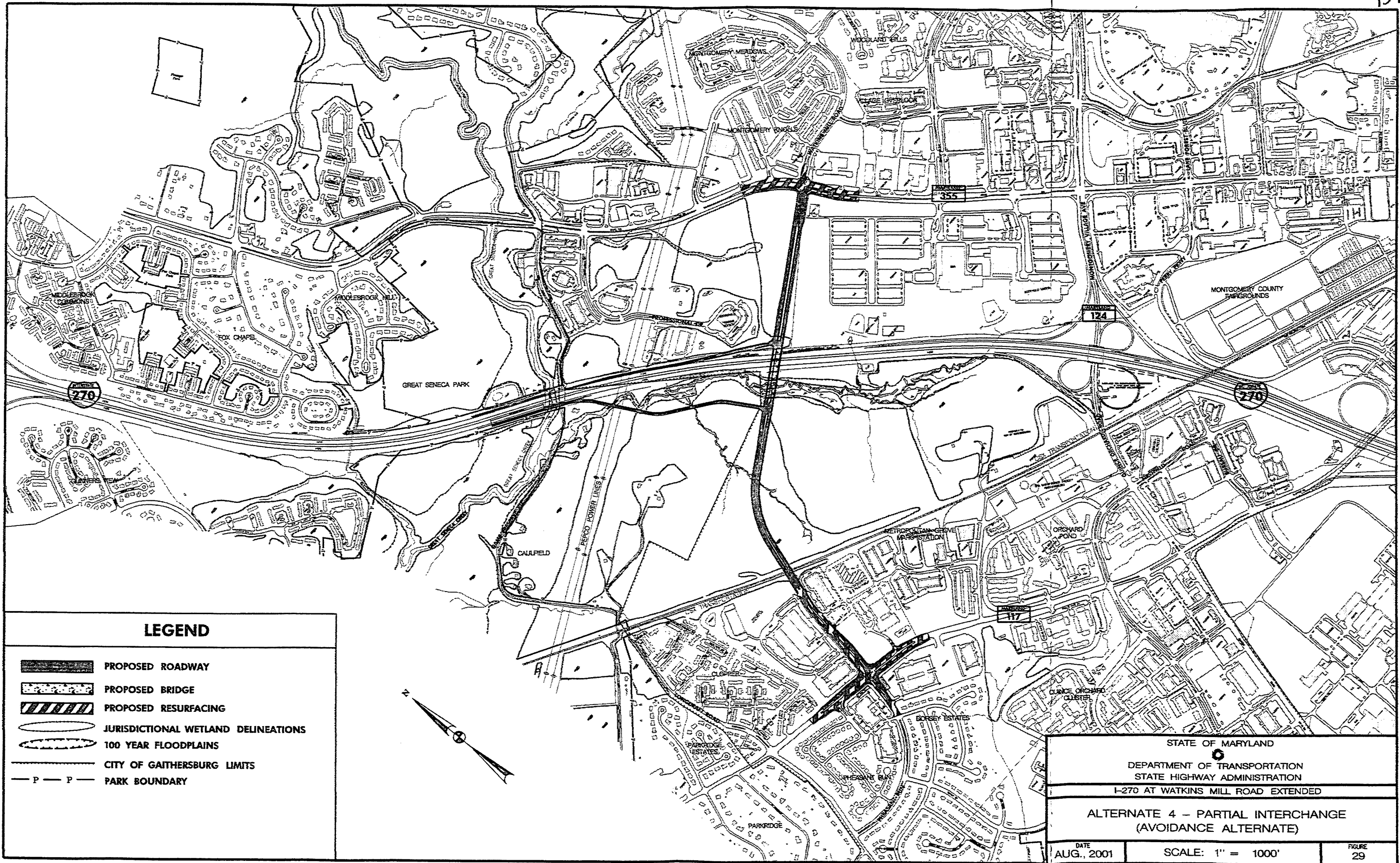
Measures to minimize harm to Section 4(f) Resources were considered and are presented herein in two general categories: stand-alone alternates and Measures Considered for Inclusion with the Selected Alternate. As presented below, among the Alternates Retained for Detailed Study, two stand-alone alternates -- Alternate 4A and Alternate 6A would have lower Section 4(f) impacts, as compared to the Selected Alternate. Following the discussion of these two alternates is a discussion of measures to minimize harm to Section 4(f) Resources that have been considered with the Selected Alternate.

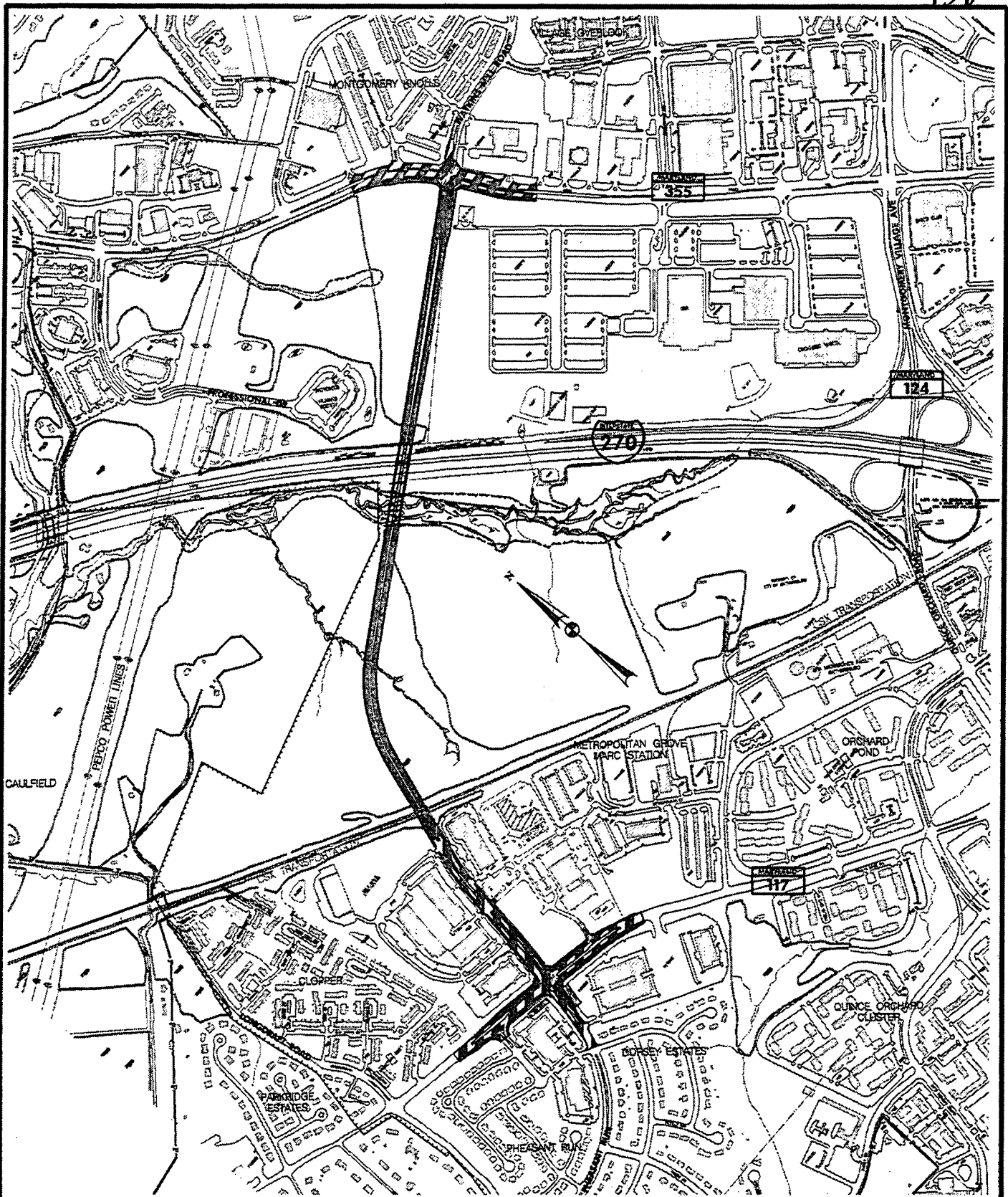
Alternate 4A

Alternate 4A would be the same as Alternate 4 (Partial Interchange - See Section III.B.1.e.), with direct high occupancy vehicle (HOV) access ramps to the Watkins Mill Road Extended bridge over I-270. This combination would provide a partial general use interchange with a full movement HOV interchange.

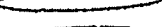
The preliminary design of Alternate 4A includes a retaining wall along the southbound (west) side of I-270, 650 feet long by 8 feet (average height) that would cost approximately







LEGEND

-  PROPOSED ROADWAY
-  PROPOSED BRIDGE
-  PROPOSED RESURFACING
-  JURISDICTIONAL WETLAND DELINEATIONS
-  100 YEAR FLOODPLAINS
-  CITY OF GAITHERSBURG LIMITS
-  PARK BOUNDARY

STATE OF MARYLAND

DEPARTMENT OF TRANSPORTATION
STATE HIGHWAY ADMINISTRATION

I-270 AT WATKINS MILL ROAD EXTENDED

ALTERNATE 6 - WATKINS MILL ROAD EXTENDED
(AVOIDANCE ALTERNATE)

DATE
AUG., 2001

SCALE: 1" = 1000'

FIGURE
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\$380,000. This retaining wall, which is just north of Great Seneca Creek, reduces the impact to Seneca Creek State Park by one acre, avoiding impacts to Seneca Creek State Park on the west side of I-270. Alternate 4A would require 0.8 acre of right-of-way from Seneca Creek State Park on the east side of I-270.

While this alternate would minimize impacts to 4(f) property, Alternate 4A, similar to Alternate 4, would not provide all of the traffic movements between I-270 and Watkins Mill Road and therefore, would not adequately address the project's purpose and need of providing improved vehicular, pedestrian, bicycle and transit access to and from the existing and planned development transportation network and improving access to the Metropolitan Grove MARC Station.

Alternate 6A

Alternate 6A would be the same as Alternate 6 (Watkins Mill Road Extended without Interchange - See Section III.B.1.g.), with direct HOV access ramps to the Watkins Mill Road Extended bridge over I-270. This combination would provide a full movement HOV interchange at Watkins Mill Road Extended, with no interchange ramps for general use (non-HOV) traffic.

Alternate 6A would require 0.8 acre of right-of-way from Seneca Creek State Park on the east side of I-270.

While this alternate would minimize impacts to 4(f) property, Alternate 6A, similar to Alternate 6, would not provide access for non-High Occupancy Vehicles to/from Watkins Mill Road to I-270 and therefore, would not adequately address the project's purpose and need of providing improved vehicular, pedestrian, bicycle and transit access to and from the existing and planned development transportation network and improving access to the Metropolitan Grove MARC Station.

Measures Considered for Inclusion with Alternate 3 Revised (Selected Alternate)

The preliminary design of the Selected Alternate includes an extended height (Type D) concrete barrier, as opposed to standard concrete barrier, along the northbound (east) and southbound (west) sides of I-270 to the north of Great Seneca Creek. The higher concrete barrier, which is approximately five feet, as compared to the standard three feet, avoids impacting Middlebrook Hill Neighborhood Conservation Area, eliminating a 0.29 acre impact to this 4(f) property, located along the east side of I-270 adjacent to Seneca Creek State Park. The Type D barrier is an SHA standard barrier which serves as a retaining wall for the adjacent graded area sloping down toward the highway. The Type D barrier also reduces the impacts to

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Seneca Creek State Park along the east and west sides of I-270. On the west side of I-270, the impact is reduced by 0.36 acre from 1.49 acres to 1.13 acres. On the east side, a 0.56 acre impacted area is eliminated, however, 4.32 acres of right-of-way from Seneca Creek State Park would still be required, mostly for an area for stormwater management, as well as, the necessary roadway supporting slopes. With the conditions present along the segments of I-270 that are below the adjacent ground, a higher barrier would not result in any further reductions in parkland required.

The impacts to Seneca Creek State Park could be further minimized by the construction of retaining walls along the east and west sides of I-270, along the I-270 segments that are above the adjacent ground. On the northbound side of I-270, the construction of a 200 feet $\pm$ long by 30 feet $\pm$ (average height) retaining wall could reduce the impact by 0.63 acre, from 4.32 acres to 3.69 acres, at a cost of approximately \$690,000. On the southbound side of I-270, the construction of a 1,000 feet $\pm$ long by 9 feet $\pm$ (average height) retaining wall could avoid impacting Seneca Creek State Park on the west side of I-270, eliminating a 1.13 acre impact to the 4(f) property at a cost of approximately \$790,000. These retaining walls would be located in the vicinity of wetlands, W-62C on the east side of I-270 and W-62A on the west side of I-270. These retaining walls have not been included in current Selected Alternate plans based on several concerns. First, these walls could pose problems in constructing the foundations of the retaining walls in the form of unforeseen expense of muck removal, select backfill placement and additional temporary wetland impact by construction equipment traversing the area. Secondly, there are potential maintenance, water quality and aesthetics concerns associated with open water impoundments in direct contact with the walls.

A final determination of the area required for stormwater management cannot be made until detailed hydrologic and hydraulic studies are completed during the final design stage. However, it appears likely that stormwater management to provide water quality control (and possibly quantity control, depending upon waiver applicability) would be required for the Selected Alternate. The proposed area of right-of-way acquisition designated within the park boundary is comprised substantially of area anticipated to be needed for stormwater management.

Based on an evaluation of size and location, new impervious area and the proposed drainage patterns with the Selected Alternate, preliminary studies indicate that the best location to provide stormwater management is at the site of an existing stormwater management pond on the east side of I-270 just north of Great Seneca Creek. This location, or the west side of I-270 just north of Great Seneca Creek, are ideal locations for stormwater management since areas to the north that would be disturbed by constructing the Selected Alternate naturally drain to these

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locations. Shifting the stormwater management location to the west side of I-270, near the logical drainage outfall points would also result in impacts to 4(f) property. Providing stormwater management at a location outside of the park was considered as a possible minimization measure. However, this appears imprudent given that the existing pond, or the west side of I-270, are currently at the location of the low point in the I-270 profile, generally where stormwater management pond locations are most prudent. Also, there is no vacant land along I-270 outside the park. Existing single family housing is located west of the park, and a high rise building is under construction in the parcel between Great Seneca Creek and the PEPCO right-of-way. Therefore, providing stormwater management outside the park area would likely involve the potentially prohibitive expenses of piping substantial amounts of stormwater against natural roadway grade and acquisition of improved properties.

G. Coordination

The U.S. Department of the Interior (DOI) has concurred (by letter dated February 13, 2001 - see Section VI) that there is no prudent and feasible avoidance alternate to 4(f) impacts to Seneca Creek State Park. The Selected Alternate park impact consists of the use of approximately 5.45 acres of Seneca Creek State Park property for right-of-way, mostly for stormwater management and the necessary roadway supporting slopes. The only impacted amenity associated with Seneca Creek State Park is a set of wooden steps leading to a hiking trail. The wooden steps, which traverse riprap supporting Game Preserve Road, are located within the existing SHA right-of-way for I-270, along the southbound (west) side of I-270. The wooden steps and a small portion of the hiking trail will likely require relocation resulting from the widening of the I-270 structure over Great Seneca Creek as part of the Selected Alternate.

DOI also concurs with the proposed measures to minimize harm, as presented in the Section 4(f) Evaluation of the Environmental Assessment. Such measures included retaining walls along both northbound and southbound I-270 adjacent to the park. The shape of the area proposed to be acquired from Seneca Creek State Park has been revised slightly from that associated with the DOI concurrence. However, the overall area and basic footprint shown in this document is the same as that agreed upon.

Seneca Creek State Park is comprised of multiple parcels of land. Two parcels adjacent to I-270 were acquired with funds from the Land and Water Conservation Fund. The impacted area is contained within these parcels that are adjacent to I-270. Other parcels were acquired using Program Open Space funds. The use of Land and Water Conservation funding or Program Open Space funding directs the DOI to assure that replacement lands of equal value, location and

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usefulness are provided as conditions to approvals of land conversion. Therefore, replacement land will be required since it has been determined that park impacts are unavoidable.

Coordination was undertaken with MD DNR Land and Water Conservation Service, who has jurisdiction over the Seneca State Park. This coordination has concerned the development of alternates, the assessment of impacts to Section 4(f) resources, and mitigation thereof. SHA met with the Seneca Creek State Park jurisdictional officer in March, 2001. Subsequent to that meeting, it was determined through further coordination with DNR that the jurisdictional officer would not prefer to annex wetlands adjacent to proposed development as preliminary mitigation for proposed impacts. It was further agreed that coordination with DNR would continue through final design to determine suitable park replacement since impacts are unavoidable (see Section VI.A. Correspondence - Agency Coordination and Section VII. Appendices). Mitigation will include complete acre per acre replacement of all impacted park area, the exact amount, shape and location of which will be determined following detailed analyses.

Based on this evaluation, it has been determined that the Selected Alternate is the only prudent and feasible alternate which minimizes impacts to Section 4(f) property and that the proposed action includes all possible planning to minimize harm.

V. PUBLIC HEARING COMMENTS

V. PUBLIC HEARING COMMENTS

The following is a summary of the testimony provided at the January 16, 2001 Location/Design Public Hearing and the responses subsequently developed by the State Highway Administration. The purpose of the hearing was to present the results of the engineering and environmental studies and to receive public comments on the project. Eighteen people spoke at the hearing, and one person provided private testimony.

A complete transcript of all comments made at the hearing is available for review at the Project Planning Division offices, State Highway Administration, 707 North Calvert Street, Baltimore, Maryland 21202. Written comments received subsequent to the Public Hearing are included in the Public Hearing Comments Section.

Elected Officials

1. Paul Carlson, Maryland House of Delegates
Indicated that he was in attendance to listen to the concerns of the local community.

SHA Response

No response required.

Organizations

2. David Freishtat, Shulman, Rogers, Gandal, Pordy & Ecker, P.A.
The local genetics companies he represents support a full interchange. They do not support Access Option B (Metropolitan Court Extended) because it has adverse impacts on parking at several of these companies.

SHA Response

Right-of-way impacts to businesses as a result of the proposed alternates will be considered as part of this study. Alternate 3 Revised, a full interchange alternate, is the SHA Selected Alternate.

3. Alan Migdall, Montgomery County Bicycle Action Group
Supports the off-road hiker-biker facility. Requests provision of striping on Watkins Mill Road Extended for on-road bicycle lanes, because experienced cyclists prefer to ride in the street.

SHA Response

The build alternates include both a 5-foot bicycle lane on Watkins Mill Road Extended and a multi-purpose trail adjacent to the roadway.

4. Martha Cadle, Montgomery Village Citizens Coalition

An interchange of I-270 at Watkins Mill Road Extended will greatly increase traffic on existing Watkins Mill Road within the Montgomery Village community and decrease safety at four schools in Montgomery Village. Montgomery Village was not included in the study area. Requested that the Corridor Cities Transitway be constructed and local roads improved before the area around the proposed interchange is developed. In favor of the No-Build Alternate or Alternate 6.

SHA Response

Traffic volumes are expected to increase over the next 20 years regardless of the outcome of this project, based on the projected growth and planned development within northern Gaithersburg. Montgomery County and the City of Gaithersburg are considering traffic calming measures along Watkins Mill Road between the City limits and Russell Avenue. These measures may include landscaped medians to narrow road width, raised crosswalks, signage or traffic signals in order to reduce vehicle speeds and decrease cut-through traffic on residential streets within the project area. Upgrades to numerous County roadways are included in the Montgomery County master plan. Construction of the Corridor Cities Transitway is being further evaluated as part of the I-270/US 15 Multi-Modal Corridor Study. Alternate 3 Revised is the SHA Selected Alternate.

5. Anne Lee, Montgomery Meadows Homeowners Association

Is satisfied that the public has been adequately informed and that the environmental concerns of the study have been addressed. Requests the study of traffic calming measures, such as islands, on Travis Avenue because of speeding problems on Watkins Mill Road.

SHA Response

Travis Avenue is within the area being evaluated for traffic calming measures, which may include landscaped medians to narrow road width, raised crosswalks, signage or traffic signals in order to reduce vehicle speeds and decrease cut-through traffic on residential streets within the project area.

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6. Larry Wellman, DiGene Corporation

Opposes Access Option B because of impacts to their property, including the possible elimination of 122 of their 266 parking spaces. In addition, this option would prevent any future expansion of their company. Also opposes widening of West Watkins Mill Road because of right-of-way impacts to their property.

SHA Response

Right-of-way impacts to businesses as a result of the proposed alternates will be considered as part of this study. Alternate 3 Revised is the SHA Selected Alternate.

7. Cathy McCarthy, Windbrook Condominium Association

Supports the No-Build Alternate. Drivers already speed on Watkins Mill Road within Montgomery Village, and an interchange of I-270 at Watkins Mill Road Extended will worsen the problem. Is concerned about safety at the four schools on Watkins Mill Road in Montgomery Village. Indicated that Watkins Mill Road Elementary School contains a large minority population.

SHA Response

Montgomery County and the City of Gaithersburg are considering traffic calming measures along Watkins Mill Road between the City limits and Russell Avenue. These measures may include landscaped medians to narrow road width, raised crosswalks, signage or traffic signals in order to reduce vehicle speeds and decrease cut-through traffic on residential streets within the project area. Alternate 3 Revised is the SHA Selected Alternate.

8. Richard Wilder, Citizens to Save West Valley Park

Construction of an interchange is not compliant with Smart Growth policies. Feels that the environmental impact from the build alternates is too great, and suggests that the land west of I-270 that is slated for development be used instead as an expansion of Seneca Creek State Park. Questions the meaning of a "streamlined environmental process". Other local roads should be improved instead. Favors the No-Build Alternate.

SHA Response

The purpose of this study is to improve vehicular, pedestrian and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Improved roadway accessibility is necessary to promote an intermodally-linked

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development center in northern Gaithersburg. The purpose of the streamlined process is to implement close coordination with appropriate Federal, State and local agencies and the public throughout the project development process. Environmental impacts as a result of the proposed alternates will be considered as part of this study. Upgrades to numerous County roadways are included in the Montgomery County master plan. Alternate 3 Revised is the SHA Selected Alternate.

Citizens

9. Daniel Reeder

Is concerned that the McGown family, who have lost a sizeable amount of land for various projects over the years (I-270, PEPCO transmission lines, Seneca Creek State Park), will lose even more land from this project. Believes that the Caulfield community on Game Preserve Road is not represented on the study's focus group. The proposed Watkins Mill Road Extended alignment does not follow the master plan, and is not explained in the environmental assessment document. Because a MARC utilization survey was not completed, there is no proof that improved access to the Metropolitan Grove MARC Station is needed or that the interchange will increase MARC usage. The existing partial interchanges at I-270/MD 124 and I-270/MD 117 should instead be made into full interchanges. Supports the No-Build Alternate.

SHA Response

Right-of-way impacts as a result of the proposed alternates are being considered as part of this study. Mr. Ed Jordan has been invited to represent the Caulfield community on the study's focus group. Currently, the utilization of the Metropolitan Grove MARC Station, 42% daily usage of the existing parking lot, is low for a MARC station. Improved roadway accessibility is necessary to promote an intermodally-linked development center in northern Gaithersburg. Although it is important to improve access to the Metropolitan Grove MARC Station in order to facilitate increased transit use, this is not the primary focus of this study. Alternate 3 Revised is the SHA Selected Alternate.

10. Saul Schepartz

Because most commuters using the MARC Metropolitan Grove Station are coming from the north, a full interchange at Watkins Mill Road Extended may not be necessary. Although a full interchange would increase traffic on existing Watkins Mill Road, it would not decrease traffic on other local roads, such as Montgomery Village Avenue, or

at intersections, such as MD 355/MD 124. Increased traffic on Watkins Mill Road will decrease safety at four schools in Montgomery Village. Supports Alternate 4.

SHA Response

Although traffic to and from Watkins Mill Road at I-270 is projected to be primarily north-oriented, the entrance ramp to southbound I-270 and the exit ramp from northbound I-270 are each projected to carry traffic that would otherwise need to use the MD 124 interchange. Currently, the utilization of the Metropolitan Grove MARC Station, 42% daily usage of the existing parking lot, is low for a MARC station. Improved roadway accessibility is necessary to promote an intermodally-linked development center in northern Gaithersburg. Although it is important to improve access to the Metropolitan Grove MARC Station in order to facilitate increased transit use, this is not the primary focus of this study. Traffic volumes are expected to increase over the next 20 years regardless of the outcome of this project, based on the projected growth and planned development within northern Gaithersburg. Montgomery County and the City of Gaithersburg are considering traffic calming measures along Watkins Mill Road between the City limits and Russell Avenue. Alternate 3 Revised is the SHA Selected Alternate.

11. Jon Rogers

Opposes any interchange of I-270 at Watkins Mill Road Extended because the resulting increased traffic on Watkins Mill Road in Montgomery Village will decrease safety at four schools in Montgomery Village. Speeding on Watkins Mill Road has been a problem ever since the speed limit was raised from 25 mph to 35 mph. The extension of MD 118 to Watkins Mill Road at the northern end of Montgomery Village will also increase traffic.

SHA Response

Traffic volumes are expected to increase over the next 20 years regardless of the outcome of this project, based on the projected growth and planned development within northern Gaithersburg. Montgomery County and the City of Gaithersburg are considering traffic calming measures along Watkins Mill Road between the City limits and Russell Avenue. These measures may include landscaped medians to narrow road width, raised crosswalks, signage or traffic signals in order to reduce vehicle speeds and decrease cut-through traffic on residential streets within the project area. Alternate 3 Revised is the SHA Selected Alternate.

12. Ed Jordan

Is a resident of the Caulfield community on Game Preserve Road west of I-270, and is concerned that his community was not represented on the focus group, despite his earlier requests to join. His community has been impacted by previous projects, such as I-270 widening, PEPCO power lines and Seneca Creek State Park. Favors the No-Build Alternate because the State has been insensitive to his concerns. Feels the purpose of the project is to serve developers, at the expense of local residents. Proposes using the land in the northwest quadrant of the interchange, currently proposed for development, as an extension of Seneca Creek State Park. A build alternate would increase ambient noise, decrease property values, cause drainage problems and decrease safety at four schools in Montgomery Village. The Metropolitan Grove MARC Station is underutilized because MARC rail service is inconvenient, not because the station is inaccessible. Better access to the MARC station could be provided through the SHA maintenance facility.

SHA Response

Mr. Jordan has been invited to represent the Caulfield community on the study's focus group. Right-of-way and environmental impacts of the proposed alternates are being considered as part of this study. The purpose of this study is to improve vehicular, pedestrian and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Although it is important to improve access to the Metropolitan Grove MARC Station in order to facilitate increased transit use, this is not the primary focus of this study. Montgomery County and the City of Gaithersburg are considering traffic calming measures along Watkins Mill Road between the City limits and Russell Avenue. Alternate 3 Revised is the SHA Selected Alternate.

13. John Kraus

Is concerned about the impact of Watkins Mill Road traffic on schools in Montgomery Village if an interchange is constructed. Montgomery Village should be included in the study area. An interchange is not necessary to serve the Metropolitan Grove MARC Station because Montgomery Village Avenue can be used to access the station. Wonders whether stormwater management has been addressed.

SHA Response

Traffic volumes are expected to increase over the next 20 years regardless of the outcome of this project, based on the projected growth and planned development within northern Gaithersburg. Montgomery County and the City of Gaithersburg are considering traffic

calming measures along Watkins Mill Road between the City limits and Russell Avenue. These measures may include landscaped medians to narrow road width, raised crosswalks, signage or traffic signals in order to reduce vehicle speeds and decrease cut-through traffic on residential streets within the project area. Currently, the utilization of the Metropolitan Grove MARC Station, 42% daily usage of the existing parking lot, is low for a MARC station. Improved roadway accessibility is necessary to promote an intermodally-linked development center in northern Gaithersburg. Although it is important to improve access to the Metropolitan Grove MARC Station in order to facilitate increased transit use, this is not the primary focus of this study. Environmental impacts as a result of the proposed alternates are being considered as part of this study.

14. Gerard Hurley

Lives on Game Preserve Road. Is concerned that his community has not been represented on the focus group. Questions the need for improvements to the Metropolitan Grove MARC Station, and suggests that the station is ineffective. In favor of the No-Build Alternate.

SHA Response

Mr. Ed Jordan has been invited to represent the Caulfield community on the study's focus group. Currently, the utilization of the Metropolitan Grove MARC Station, 42% daily usage of the existing parking lot, is low for a MARC station. Improved roadway accessibility is necessary to promote an intermodally-linked development center in northern Gaithersburg. Although it is important to improve access to the Metropolitan Grove MARC Station in order to facilitate increased transit use, this is not the primary focus of this study. Alternate 3 Revised is the SHA Selected Alternate.

15. Mary Hurley

Lives on Game Preserve Road. Is concerned about the project's environmental impacts to local wildlife, especially bluebirds.

SHA Response

Mr. Ed Jordan has been invited to represent the Caulfield community on the study's focus group. Wildlife impacts as a result of the proposed alternates are being considered as part of this study.

16. Richard Wright

Is a member of the Montgomery Village Board, and is concerned about traffic impacts to the schools on Watkins Mill Road within the Montgomery Village community. Supports Alternate 6.

SHA Response

Traffic volumes are expected to increase over the next 20 years regardless of the outcome of this project, based on the projected growth and planned development within northern Gaithersburg. Montgomery County and the City of Gaithersburg are considering traffic calming measures along Watkins Mill Road between the City limits and Russell Avenue. These measures may include landscaped medians to narrow road width, raised crosswalks, signage or traffic signals in order to reduce vehicle speeds and decrease cut-through traffic on residential streets within the project area. Alternate 3 Revised is the SHA Selected Alternate.

17. Jan Watson

Is a member of the Montgomery Village Foundation Transportation Committee. Opposes any interchange of I-270 and Watkins Mill Road Extended because of environmental impacts and safety concerns at the schools on Watkins Mill Road in Montgomery Village. Speeding on Watkins Mill Road is already a problem in Montgomery Village, especially since the speed limit was raised from 25 mph to 35 mph.

SHA Response

Environmental impacts as a result of the proposed alternates are being considered as part of this study. Traffic volumes are expected to increase over the next 20 years regardless of the outcome of this project, based on the projected growth and planned development within northern Gaithersburg. Montgomery County and the City of Gaithersburg are considering traffic calming measures along Watkins Mill Road between the City limits and Russell Avenue. These measures may include landscaped medians to narrow road width, raised crosswalks, signage or traffic signals in order to reduce vehicle speeds and decrease cut-through traffic on residential streets within the project area. Alternate 3 Revised is the SHA Selected Alternate.

18. Howard Precoris

Lives on Game Preserve Road next to I-270. A full movement interchange would require the displacement of his family. Favors the No-Build Alternate.

SHA Response

Mr. Ed Jordan has been invited to represent the Caulfield community on the study's focus group. In addition to the No-Build Alternate, Alternate 4 and Alternate 6 have fewer right-of-way impacts than the full-movement interchange alternates, and would not be expected to require displacement of this property. Alternate 3 Revised is the SHA Selected Alternate. This alternate differs from Alternate 3, which was presented at the Public Hearing, in that the ramp alignment in the northwest quadrant of the interchange and the C-D typical section have been refined and a retaining wall has been incorporated into the design to avoid displacing this residence.

19. Polly Rogers

An interchange of I-270 at Watkins Mill Road Extended will decrease safety at four schools in Montgomery Village. Supports Alternate 6.

SHA Response

Montgomery County and the City of Gaithersburg are considering traffic calming measures along Watkins Mill Road between the City limits and Russell Avenue. These measures may include landscaped medians to narrow road width, raised crosswalks, signage or traffic signals in order to reduce vehicle speeds and decrease cut-through traffic on residential streets within the project area. Alternate 3 Revised is the SHA Selected Alternate.

VI. CORRESPONDENCE

VI. CORRESPONDENCE

A. Interagency Meetings/Agency Coordination

Interagency Review Meetings

The I-270 project planning study at Watkins Mill Road Extended was discussed at ten Maryland State Highway Administration Interagency Review Meetings.

The March 17, 1999 Interagency Review meeting included a project introduction and overview on the Purpose and Need Statement for the project, along with the distribution of a draft copy of the Purpose and Need Statement. In attendance were representatives from the State Highway Administration (SHA), Federal Highway Administration (FHWA), US Environmental Protection Agency (EPA), Maryland Department of Transportation (MDOT), Maryland Historical Trust (MHT), Maryland Department of the Environment (MDE), US Corps of Engineers (COE), Maryland Department of Natural Resources (DNR), National Park Service (NPS), National Marine Fisheries (NMF), US Fish and Wildlife Service (USFWS), and the Maryland Office of Planning (MOP), which is now the Maryland Department of Planning (MDP). The project was preliminarily identified as a pilot project for environmental streamlining under the Transportation Equity Act for the 21st Century (TEA-21). It was requested that the agencies provide any feedback on questions regarding environmental streamlining and interagency coordination to the project team and to the Environmental Streamlining Steering Committee.

The purpose of the April 21, 1999 Interagency Review meeting was to discuss comments, suggestions, and revisions to the draft Purpose and Need Statement as well as efforts to streamline this pilot project. In attendance were representatives from SHA, MDP, Montgomery County Department of Public Works and Transportation (MCDPWT), Maryland-National Capital Park and Planning Commission (M-NCPPC), MHT, DNR, MDE, FHWA, EPA, and the Wilson T. Ballard Company. A copy of a Draft Purpose and Need Statement and draft Environmental Streamlining procedures were distributed to the group. General comments raised included addressing transit services at the MARC Station, expanding the discussion on planned development, and looking into neighboring projects.

At the May 19, 1999 Interagency Review meeting, the project team met with the Interagency Review Group to discuss purpose and need including segmentation issues. In attendance were representatives from SHA, EPA, FHWA, DNR, MDP, and COE. Agency review of a draft segmentation paper handout was requested. It was noted that SHA would not proceed with the Purpose and Need Statement until the segmentation issues were addressed.

At the June 16, 1999 Interagency Review meeting, comments on the segmentation paper and milestones were reviewed. In attendance were representatives from SHA, EPA, FHWA, DNR, MDP, MDOT, and COE. Comments and questions concerning the segmentation paper were addressed and copies were distributed to those who had not previously received it. The meeting also included a brief environmental overview and a review of the revised Purpose and Need Statement, which included changes made in response to agency and team comments. The revised one page Summary/Concurrence Form for the project Purpose and Need Statement was distributed. It was requested that an alternates scoping meeting be held at the next Interagency Review meeting, and that a field review take place the next day, if needed. Subsequent to the June 16, 1999 meeting, MDE was to provide wording revisions for the segmentation paper and an alternates field/office review meeting was to be scheduled after receiving concurrence on the purpose and need. The Purpose and Need Statement summary was submitted to the agencies on June 23, 1999 along with a request for their formal concurrence within 15 days.

The purpose of the July 21, 1999 Interagency Review meeting was to initiate scoping of preliminary alternates with the agencies, which would continue at the August 26, 1999 Interagency Field Review meeting. In attendance were representatives from SHA, EPA, FHWA, DNR, MDP, MDOT, COE and the Wilson T. Ballard Company.

It was noted that concurrence from all agencies had been received on the project Purpose and Need Statement. In addition to the five alternates developed and presented by SHA, the COE suggested three new alternates. It was suggested that all eight alternates be plotted and sent to the agencies for review prior to the August 26, 1999 Interagency Field Review meeting. Subsequent to the July 21, 1999 meeting, SHA sent copies of the mapping with the suggested alignments to the agencies for the August 26, 1999 Interagency Field Review Meeting.

At the October 20, 1999 Interagency Review meeting, the project team presented the alternates recommended to be dropped prior to the Alternates Public Workshop. In attendance were representatives from SHA, FHWA, DNR, MDP, MDE, COE, and the Wilson T. Ballard Company. It was noted that all of the build alternates include the four- to six-lane extension of Watkins Mill Road between MD 355 and MD 117, an HOV lane in both directions and various access options. Bicycle/Pedestrian access was discussed and noted that it would be highlighted at the workshop. A summary of the environmental impacts and an overview of the build traffic conditions were provided for the agencies.

The purpose of the January 19, 2000 Interagency Review meeting was to get agency comments on the draft alternates retained for detailed study. In attendance were representatives from SHA, FHWA, M-NCPPC, MHT, DNR, MDP, MDE, and COE.

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It was noted that the Alternates Workshop was well attended and that most of the comments regarded traffic and safety concerns. As an addition to the alternates retained presentation, it was mentioned that the alternates were grouped into four categories for travel forecasting purposes; also that more detailed traffic information would be provided as the project proceeds into Stage II. Tributaries of Great Seneca Creek are located within the project area and were noted as being designated as Use 1 Water by DNR. At the request of the COE to minimize impacts to aquatic resources, bridges and structures have been included into the preliminary design. It was recommended that SHA maintain coordination with the liaison for the Great Seneca Park property. SHA has continued to coordinate with park officials located within the project area.

A July 19, 2000 Interagency Review meeting was held to present crossing options of Great Seneca and to discuss stream impacts resulting from those options. In attendance were representatives from SHA, the Wilson T. Ballard Company, COE, MDP, DNR and MDE. The COE agreed to drop one ramp crossing. In addition, the COE suggested additional Rosgen studies. The COE, MDP, DNR and MDE requested review of the preliminary draft Environmental Assessment/4(f) document.

The purpose of the March 21, 2001 Interagency Review meeting was to update the agencies on the project schedule and to present the modifications included in the Preferred Alternate 3 Revised prior to the Administrator's review. In attendance were representatives from SHA, The Wilson T. Ballard Company, FHWA, MDP, DNR, COE, and MDE. The modifications included in the Preferred Alternate were made to accommodate Collector/Distributor lanes consistent with the I-270 Corridor and eliminate a proposed residential displacement. It was noted that SHA is continuing to coordinate with representatives of Seneca Creek State Park to provide mitigation for proposed park impacts.

At the June 20, 2001 Interagency Review meeting, the project team met with the Interagency Review Group to present the Selected Alternate and mitigation measures. In attendance were representatives for SHA, EPA, FHWA, MDP, DNR, COE, Baltimore Metropolitan Council (BMC), and MDE. In response to comments received from the public and agencies and to provide compatibility with the I-270/US 15 project, Alternate 3 was revised to include painted Collector/Distributor lanes southbound; a mainline shift to the east to minimize stream and utility relocations; and a realigned ramp from southbound I-270 with a combination of retaining wall and stream relocation near the ramp's diverge point, and a bridge at the ramp's crossing of the stream tributary.

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The Selected Alternate 3 Revised impacts Seneca Creek State Park, a Section 4(f) resource. NPS has concurred that there is no prudent and feasible alternate to the impacts to the park and has concurred with mitigation measures as presented in the EA. Preliminary stream mitigation has been developed based on a Rosgen analysis and will continue to be refined through final design. The mitigation concepts include relocation in eroding areas using boulder armoring and vegetated overbanks. Advanced wetland mitigation has been completed through Maryland's State-Wide Banking Agreement. DNR noted that SHA should continue to coordinate with Seneca Creek State Park. MDP requested that direct access to MARC be provided as part of this project. This is an option that was dropped as a result of comments presented at the Public Hearing including impacts due to an existing parking lot expansion. SHA indicated that future development would provide direct access to the MARC station. MDP also requested traffic volumes on Watkins Mill Road east. SHA has provided this additional traffic data. MDP expressed concern regarding pedestrians crossing Watkins Mill Road east as it is proposed to be widened to six lanes. SHA will address this concern during final design. MDP also requested that the final environmental document include a map showing the Priority Funding Area with the Selected Alternate 3 Revised.

Interagency Field Review Meetings

Several Maryland State Highway Administration Interagency Field Review Meetings were held for the I-270 and Watkins Mill Road Extended project. Enclosed is a summary of various field meetings including field minutes.

Subsequent to a March 17, 1999 Interagency Review Meeting, a memorandum was drafted to discuss the possibility of the project becoming an environmental streamlining pilot project. Environmental streamlining efforts had been suggested to facilitate the merged National Environmental Policy Act (NEPA) process. The memorandum suggested strategies to achieve streamlining and discussion to prepare for the next Interagency Review Meeting. Preliminary discussions proposed a sequence of events for concurrence points on the project, including:

- the submittal of a draft document package to the agency members 15 - 30 days in advance of the upcoming monthly Interagency Review Meetings,
- meeting with agency members to discuss comments/suggestions on draft documents,
- discussing potential concurrence issues as they arise,
- submitting concurrence request letters immediately following the Interagency Review Meeting to achieve a 15 - 30 day concurrence timeframe,

- pre-scheduling Interagency Field Review Meetings at the beginning of the project, and
- identifying the criteria that could be used in eliminating alternates from further consideration.

On Friday, June 11, 1999, an Interagency Field Review Meeting was held to discuss segmentation issues, purpose and need issues, an environmental overview and to review the project area. In attendance were representatives from MCDPWT, MDE, COE, DNR, M-NCPPC, City of Gaithersburg, EPA, FHWA, USFWS, MDP and The Wilson T. Ballard Company. Upon reviewing the project area, the group outlined and revised a one page Purpose and Need Statement Summary Overview, which would also be used for concurrence.

On Thursday, August 26, 1999, an Interagency Field Review Meeting was held to scope and discuss preliminary alternates and review alignments in the field. In attendance were representatives from SHA, MCDPWT, MDE, COE, FHWA, USFWS, City of Gaithersburg, EPA, MDP, The Wilson T. Ballard Company and Straughan Environmental Services. The group discussed the project background, preliminary alternates, and a preliminary Secondary and Cumulative Effects Analysis boundary. In discussing preliminary alternates, it was concluded that some shift be investigated with the alignment for what is now Alternate 2-I. The COE suggested a more favorable ramp alignment stream crossing of the Great Seneca Tributary. In addition, the group agreed to drop the Left-Hand Exit, the Double-Decker and the Urban Diamond Scenarios, largely due to driver expectancy, redundancy with other preliminary alternates or environmental constraints.

On Wednesday, September 29, 1999, an Interagency Field Review Meeting was held to review the functional assessments performed for the Watkins Mill Road Interchange wetlands with the purpose of reaching interagency consensus on the derived values of these areas. In attendance were representatives from SHA, COE, USFWS, DNR, Montgomery County, Straughan Environmental Services, Coastal Resources Inc. and The Wilson T. Ballard Company. Functional assessments were completed using both the Evaluation for Planned Wetlands (EPW) and New England methodologies. Consensus on the functional assessment was reached and a wetland delineation report was prepared.

On Friday, April 7, 2000, an Interagency Field Review Meeting was held to discuss and review in the field issues associated with Alternates 2 and 3 as they impact the stream tributary of the Great Seneca Creek and the wetland system adjacent to I-270. In attendance were representatives from SHA, COE, USFWS, The Wilson T. Ballard Company and Straughan Environmental Services. It was agreed that Alternates 2-I and 5 will be reviewed in more

engineering detail as avoidance/minimization options to Alternates 2 and 3. Options for stream impact, stream relocations and ramps crossing the stream tributary were also discussed.

AGENCY COORDINATION
(GENERAL)



MONTGOMERY COUNTY DEPARTMENT OF PARK & PLANNING

THE MARYLAND-NATIONAL CAPITAL
PARK AND PLANNING COMMISSION

8787 Georgia Avenue
Silver Spring, Maryland 20910-3760

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August 20, 2001

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

Re: Project No. M0839B11

Cynthia
Dear Ms. Simpson:

I am responding to your August 9 letter addressed to Arthur Holmes, Chairman of the Montgomery County Planning Board, asking for a determination of consistency of the Watkins Mill Road Extended project with Smart Growth. The I-270 Interchange at Watkins Mill Road Extended is consistent with Smart Growth and neighborhood conservation programs.

The project is within the County's priority funding area. It is within the corporate limits of Gaithersburg and is an element of their Master Plan. The project increases the accessibility of the existing Metropolitan Grove MARC station among other attributes.

With regard to neighborhood conservation issues, the project does not require taking any existing structures. The proposed project is bounded by commercial structures none of which are of historic significance. The project is consistent with neighborhood conservation.

If you have further questions on this matter, please address them to Sue Edwards, I-270 Corridor Team Leader, who can be reached at 301-495-4518.

Sincerely,

Charles R. Loehr
Director

CRL:JZ:ss\G:\Watkins Mill Road ext.doc

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THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

8787 Georgia Avenue • Silver Spring, Maryland 20910-3760

(301) 495-4605

Montgomery County Planning Board
Office of the Chairman

May 16, 2001

Neil J. Pedersen
Deputy Administrator for Planning and Preliminary Engineering
State Highway Administration
707 North Calvert Street
Baltimore, MD 21203-0717

Dear Mr. Pedersen:

Thank you for your briefing of April 26 to the Planning Board regarding the I-270/Watkins Mill Road interchange project planning study. The Planning Board supports the construction of a full-movement interchange as proposed in Alternate 3 Revised, and concurred with the staff recommendations contained in the six statements below:

1. Further design must ensure that the feasibility of alternatives being examined in the I-270/US 15 Multimodal Study are not adversely affected.
2. Traffic mitigation tools or programs need to be developed to address the adverse effects of increased traffic passing by the four public schools along Watkins Mill Road within Montgomery Village.
3. Access to the Metropolitan Grove MARC station must be ensured by specifying appropriate design parameters for station facilities and access to be provided by private sector development.
4. Additional documentation regarding traffic operations at interchange ramp terminals and the expected intensity of land use adjacent to the interchange needs to be completed to clarify questions raised and confirm design adequacy.
5. Further design should incorporate the recommendations of the 1990 I-270 Master Planting Plan Design Guidelines.
6. The State Highway Administration should provide an update on these activities to the Planning Board prior to completion of the environmental documentation this autumn.

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Neil J. Pedersen
May 16, 2001
Page Two

I appreciate your continuing coordination with our staff on this project. The Planning Board briefings being conducted at this stage in the planning process will provide valuable context for the subsequent Mandatory Referral review..

Additional transportation projects are needed in the I-270 corridor to support the transit-oriented developments rapidly being built. The land use changes in the corridor fulfill both Master Plan and Smart Growth visions for the corridor; improvements to the transportation system, including additional fixed-guideway transit, must keep pace. The Planning Board urges the State Highway Administration to accelerate the I-270/US 15 Multi-modal Study so that additional projects can move swiftly toward implementation.

Sincerely,



William H. Hussmann
Chairman

WHH:DKH:cmd

letter to pedersen re I-270 at watkins mill.doc



**Maryland Department of Transportation
State Highway Administration**

FM030101-388
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Parris N. Glendening
Governor
John D. Porcari
Secretary
Parker F. Williams
Administrator

February 21, 2001

Re: Project No. MO895B21
MD 28 and I-270 Offsite Wetland
Mitigation, Linthicum Property
Montgomery County, Maryland

Mr. Nelson J. Castellanos
Division Administrator
Federal Highway Administration
711 West 40th Street
The Rotunda – Suite 220
Baltimore, Maryland 21211

Attention: Ms. Esther Strawder

Dear Mr. Castellanos:

In accordance with the CEQ Regulations and 23 CFR 771, the Maryland State Highway Administration (SHA) requests your concurrence that the proposed offsite wetland mitigation project in Montgomery County, for unavoidable impacts associated with the proposed widening of MD 28 from Riffle Ford Road to Great Seneca Highway and improvements to the I-270 Interchanges at Democracy Boulevard and MD 187, be appropriately classified as a Categorical Exclusion (CE). This mitigation project proposes to create approximately 20 acres for both nontidal wetland creation and stream restoration. On October 6, 1999, the U.S. Army Corps of Engineers (ACOE) granted concurrence on the acceptability of the Linthicum site as mitigation for both referenced projects. The Maryland Department of the Environment (MDE) concurred on December 3, 1999.

The proposed mitigation site (C.T. Linthicum Property) is located at 13100 West Old Baltimore Road, approximately 5,000 feet west of Frederick Road (MD 355) and 1,750 feet east of Interstate 270 (I-270). The portion of the site under consideration as mitigation acreage (study area) consists of an approximately 800-foot wide floodplain area along the main stem of Little Seneca Creek, which traverses the center of the property. The study area is further divided into a northern area totaling approximately 16 +/- acres on the north side of the road, and a southern area totaling approximately 22 +/- acres on the south side of the road. An existing sewer line that traverses the site from north to south along the western edge of Little Seneca Creek and an AT&T underground cable paralleling the south side of west Old Baltimore Road will need to be considered in the design of the wetland mitigation site.

My telephone number is 410-545-0412

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. Nelson J. Castellanos
MD 28 and I-270 Wetland Mitigation
Page Two

Little Seneca Creek which flows in a southerly direction through the site, appears to be a third order stream, based upon USGS 7.5 Minute Series Topographic Quadrangle mapping. The floodplain area along the creek is currently utilized as an active cattle pasture in both the northern and southern portions of the site. There are numerous areas along the stream where the banks have become heavily eroded due to trampling by the cattle. The drainage area to the point where Little Seneca Creek enters the northern portion of the site is approximately 2,757 acres, while the drainage area to the point where the creek leaves the study area is approximately 4,336 acres. The majority of the land cover within the drainage area to the site consists of various types of agricultural cover/pasture, with some areas of forested cover, and a few areas featuring rural residential land uses.

The National Wetland Inventory map indicates that the study area features zones of palustrine emergent and forested wetlands adjacent to the west side of the stream throughout the northern portion, and in one smaller location in the southern portion of the study area.

Soils underlying the study area include soils predominantly from the Hatboro silt loam series (80% of the total area). Hatboro soils are listed as a primary hydric soil on the National and State Hydric Soil lists. Small portions of the site, along the western edge of the southern area are underlain by soils from the Codorus silt loam (9 %) and Glenville silt loam series (7%). Soils in these series are both considered secondary hydric soils that may potentially contain small inclusions of soils on the National and State Hydric Soil lists. Other soil types that are not considered primary or secondary hydric soils combine to underlie approximately 4% of the site.

Although the soil borings were conducted during a period of rather severe drought conditions, groundwater was reached between a depth of two to three feet in seven of the ten borings (Borings 2-4, 6-8, & 10) on the south side of the site. For the three borings in which groundwater was not reached (Borings 1, 5, & 9), the gravel or rock layer was reached at three feet or less, causing refusal of the auger. The water surface level in the stream in this area ranged from two to four feet below the top of the bank.

For the northern portion of the site, groundwater was reached within 18 inches in two of four borings (Borings 12 & 13). Rock was reached at between three and four feet at the other two borings (Borings 11 & 14). The water surface level in the stream in the northern area ranged from three to four feet below the top of the bank.

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Mr. Nelson J. Castellanos
MD 28 and I-270 Wetland Mitigation
Page Three

An environmental assessment was completed for this proposed wetland mitigation study area. Based on a review of the Federal Emergency Management Agency (FEMA) mapping for Montgomery County, no FEMA designated 100-year floodplains occur within the study area. Should there be any modifications to the existing drainage structures within the wetland or stream areas, permits, including water quality certification approval from the Maryland Department of the Environment (MDE), a U.S. Army Corps of Engineers Section 404 permit, and a Maryland Department of Natural Resources (DNR) Waterway Construction Permit may be required. A grading and sediment control plan will be prepared to minimize the potential for erosion and sedimentation and adverse effects to water quality and should be submitted to the MDE for review and approval.

A review of the historic sites mapping, supplemented by a field visit to the project area failed to identify any significant historic standing structures in the project area. An archeological assessment of potential (AOP) completed for the project, recommended that given the project area's marginal ecological setting and absence of historic structures within the area of potential effect (APE), the project area had a low potential to yield significant archeological resources. Accordingly, the Maryland Historical Trust (MHT) concurred in a determination of no effect on significant cultural resources on October 20, 1999 (attached).

Little Seneca Creek and its tributaries have been designated as Use I (Water Contact Recreation, Protection of Aquatic Life) waters by the DNR. Should in-stream construction be proposed, a Waterway Construction Permit and time of year restrictions from March 1 through June 15, inclusive may be required, for protection of aquatic resources. Coordination with the Maryland DNR and the U.S. Fish and Wildlife (attached) indicates that there are no known federal or state rare, threatened, or endangered plant or wildlife species in the study area. Additionally, the DNR Environmental Review indicates that there are no anadromous fish species located in the project area.

The Linthicum site provides opportunities to mitigate impacts through a combination of creation of new wetland areas, enhancement and/or restoration of existing/former wetlands, and preservation of existing wetlands, all on the same site. The northern portion of the site (16 +/- acres) would likely include all of the above options, while the southern portion (22 +/- acres) would likely require more wetland creation to meet the mitigation needs. In addition, opportunities exist on the site to meet potential stream restoration and reforestation needs associated with the projects.

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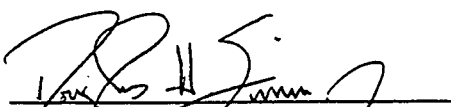
Mr. Nelson J. Castellanos
MD 28 and I-270 Wetland Mitigation
Page Four

Based on the information and conclusions presented above, we are now requesting your concurrence that this project meets the criteria for classification as a Categorical Exclusion. If you agree with this determination, please indicate your approval on the signature line below.

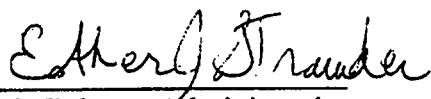
Sincerely,

Parker F. Williams
Administrator

by:


Douglas H. Simmons, Director
Office of Planning and
Preliminary Engineering

Concurrence:


Federal Highway Administration
Division Administrator

3/21/01
Date

Enclosure (1)

cc: Mr. William Branch, SHA-OED
Mr. Steve Ches, SHA-OHD
Ms. Anne Elrays, SHA-PPD
Mr. Bruce Grey, SHA-PPD
Ms. Susie Jacobs, SHA-OED
Ms. Cheryl Jordan, SHA-OED
Mr. Joseph Kresslein, SHA-PPD
Ms. Cynthia Simpson, SHA-PPD
Ms. Lorraine Strow, SHA-PPD
Mr. Charlie Watkins, SHA-District 3



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

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ER 00/859

FEB 13 2001

Ms. Cynthia D. Simpson
Deputy Director
Office of Planning and Engineering
Mailstop C-301
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

Dear Ms. Simpson:

This is in response to the request for the Department of the Interior's comments on the Draft Environmental Assessment and Section 4(f) Evaluation for **I-270 at Watkins Mill Road Extended {Project No. MO839B11}**, City of Gaithersburg, Montgomery County, Maryland.

We concur that there is no prudent and feasible alternative to the proposed project, if project objectives are to be met. We also concur with the proposed measures to minimize harm to Section 4(f) resources which may be affected by the proposed project.

The Department of the Interior has no objection to Section 4(f) approval of this project by the Department of Transportation.

We appreciate the opportunity to provide these comments.

Sincerely,

Willie R. Taylor
Director, Office of Environmental Policy
and Compliance



**Maryland Department of Transportation
State Highway Administration**

February 7, 2001

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
City of Gaithersburg
Montgomery County, Maryland

189
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

Mr. Paul R. Wettlaufer
Transportation Program Manager
U.S. Army Corps of Engineers
Baltimore District
CENAB-OP-RMN
P.O. Box 1715
Baltimore, MD 21203-1715

Dear Mr. Wettlaufer:

Thank you for your letter dated January 16, 2001, providing comments on the Environmental Assessment/Section 4(f) Evaluation for the at I-270/Watkins Mill Road Extended project. This response addresses the concerns outlined in your letter.

Alternates 2 and 2A

The construction of the exit ramp from southbound I-270 to Watkins Mill Road Extended would require the relocation of at least a small segment of water and sewer pipe paralleling I-270. However, it is unlikely that these pipes would be placed back in the stream channel.

A range of potential minimization and avoidance measures are discussed in Section V. E. 2. of the document for these and all other build alternates. The State Highway Administration (SHA) recognizes the sensitivity of the segments of the Great Seneca Creek tributary that would be impacted with these alternates. However, due to the complex range of combined alignments, culvert/bridge treatments and stream relocations possible to minimize stream impacts, a detailed presentation of every possible scenario was beyond what could concisely be presented in this document. The Rosgen analysis that was performed at the request of the U.S. Army Corps of Engineers (Corps) sets the framework for working with the Corps and other agencies in refinement of alignments, determination of hydraulic structures and determination of possible stream relocations and enhancements during the process of selecting a preferred alternate.

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Alternates 3, 4 and 4A

SHA acknowledges that previous commitments were made regarding the bridging of certain crossings of the Great Seneca Creek tributary during the Alternates Retained for Detailed Study discussions. However, with the wide range of optional northwest quadrant ramp alignments that are under consideration, yielding many potential stream crossing locations/structure types, we felt that it was premature to specify this information in this Environmental Assessment. The preliminary hydraulic analysis indicated that the flow within the tributary channel is well within the levels for which culverts are normally constructed by SHA. In this case, a 10-foot by 10-foot box culvert would likely be sufficient, hydraulically, recognizing that additional cells may be necessary for wildlife passage. Therefore, for purposes of consistency between all alternates and options, and to show the worst case impact, culverts were assumed in all locations with all alternates (except the loop ramp with Alternate 2, where a culvert did not appear feasible). With this approach, the cost and benefit of using bridge(s) instead of box culverts can be fully documented as the selection of an alternate is made and the various details concerning its design are resolved.

In the development of the referenced off-ramp alignment, SHA has taken into account previous Corps and other agency comments, property owner concerns and right-of-way unit costs. In particular, SHA interpreted from the April, 2000 field review meeting that the Corps may be amenable to stream relocation at the referenced location (300-feet south of the first crossing) depending upon the results of the Rosgen analysis. If stream relocation is not permissible at this location the cost of a bridge on the same alignment will need to be compared to the right-of-way cost on a shifted alignment. SHA requests that any direction to modify alignments be deferred until a combined discussion of the public hearing comments, the Rosgen analysis results and other issues addressed herein can be held between SHA and representatives of the Corps.

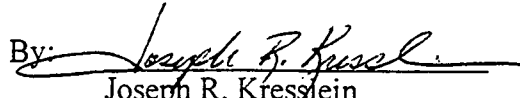
SHA recognizes that the proposed 550 feet of stream relocation is not desirable; however, based on the Rosgen analysis, it appears feasible to provide a relocation that maintains or possibly enhances the quality of this portion of the stream under Alternate 3. SHA agrees that AASHTO minimum criteria allows a shorter deceleration lane length than the 800 feet used in the current Alternate 3 design, which is an SHA desirable criteria. SHA Highway Design Division staff is currently analyzing this issue and will be prepared to respond to the Corps as part of the upcoming coordination to select an alternate.

We will continue to evaluate a full range of stream crossing options for presentation and discussion with you individually, as well as at the upcoming Interagency Meeting scheduled for March 21. Thank you again for your comments and for your continued interests in this project. If you should have any questions, please feel free to call me at 410-545-8500 or 1-800-548-5026.

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Very truly yours,

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

By: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

cc: Transcript (with incoming)

Ms. Caryn Brookman, FHWA
Mr. Prakash Dave, OBD
Mr. Steve Elinsky, COE
Ms. Anne Elrays, PPD
Mr. Elder Ghigiarelli, MDE
Mr. Greg Golden, DNR
Mr. Joseph Kresslein, PPD
Mr. J. Rodney Little, MHT
Mr. Mark Lotz, W.T. Ballard Co.
Ms. Melinda Peters, OHD
Ms. Denise Rigney, EPA
Ms. Denise Winslow, FHWA
Mr. James Wynn, PPD
Ms. Bihui Xu, MDP



DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS
P.O. BOX 1715
BALTIMORE, MD 21203-1715

REPLY TO
ATTENTION OF

Operations Division

JAN 16 2001

Subject: CENAB-OP-RMN(MD SHA/I-270 @ WATKINS MILL ROAD
EXTENDED/EA COMMENTS)99-00838-12

Maryland Department of Transportation
State Highway Administration
Attn: Ms. Cynthia D. Simpson, Deputy Director
Office of Planning and Engineering
Mailstop C-301
707 North Calvert Street
Baltimore, Maryland 21202

Dear Ms. Simpson:

The Baltimore District of the U.S. Army Corps of Engineers (Corps) has completed its review of the Environmental Assessment (EA) for the I-270 at Watkins Mill Road Extended project and offers the following comments and recommendations:

- (a). Alternatives 2 & 2A – The construction of the proposed off-ramp, from I-270 SB to Watkins Mill Road, would require the placement of a pipe in the stream in addition to a stream relocation. The loop ramp to I-270 SB would also result in impacts to the stream system. The overall impacts associated with Alternatives 2 and 2A, with or without minimization measures, are considered to be excessive by this office. Section V of the EA indicates that wetland impacts could be reduced through minimization measures. However, no minimization measures or alternate designs for the previously mentioned ramps have been included in the EA. Should the Maryland State Highway Administration (SHA) decide to pursue either alternative as the preferred, this office strongly recommends that the ramps be relocated or redesigned to avoid or significantly reduce stream impacts.
- (b). Alternatives 3, 4, and 4A – Figures IV-14, IV-18, and IV-31 all indicate that the first crossing associated with the off-ramp from I-270 SB would consist of a pipe that would necessitate the need for a stream relocation. In previous meetings, both in the field and office, SHA committed to a bridge in this location. This office recommends that all pertinent plans be modified to correct the errors.

In those figures referenced above, the alignment for the off-ramp (approximately 300-feet south of the first crossing) is in very close proximity to the stream. This was also noted in our review of the Alternatives Retained for Detailed Studies package in addition to the Draft EA. In comment letters pertaining to the aforementioned documents, we recommended that the alignment should be relocated to the southwest to

avoid impacts to the stream and its floodplain in this area. The Corps reiterates its recommendation that the alignment should be relocated to the southwest to avoid stream impacts.

The overall stream impacts associated with each alternative are excessive, especially Alternative 3. Figure IV-14 (Alt. 3) indicates that approximately 550-feet of stream relocation would be required to accommodate the deceleration ramp from I-270 SB to the MD 124 interchange. We have researched the recommended lengths for deceleration ramps (found on page 949/Table X-6 in AASHTO's A Policy on Geometric Design of Highways and Streets, '94) and discovered that the minimum length for a deceleration ramp in the applicable setting would be 591-feet in length. The deceleration ramp depicted on figure IV-14 is greater than 900-feet in length. We therefore recommend that SHA should give consideration to the reduction of the ramp's length if doing so enables the stream relocation to be avoided.

Pages IV-6 and 7 in the EA state that the designs of Alternatives 3 and 4 would allow some flexibility in the avoidance of stream impacts. The design flexibility should be incorporated to further reduce stream impacts. Additional avoidance and/or minimization could be achieved through the use of bridges rather than culverts and the previously mentioned ramp realignment.

(c). Alternatives 6 and 6A – The impacts associated with Alternatives 6 and 6A for both wetlands and streams are reasonable, further avoidance and minimization measures are recommended.

If you have any questions regarding this matter, please contact Mr. Steve Elinsky of this office at 410.962.4503.

Sincerely,



Paul R. Wettlaufer
Transportation Program Manager

cc: Ms. Jamie Stark, EPA/Region 3
Mr. Daniel Johnson, FHWA/Maryland Division
Mr. Bob Zepp, USFWS/CBFO
Mr. John Nichols, NMFS
Mr. Elder Ghigiarelli, MDE
Mr. Greg Golden, DNR/ERU
Mr. J. Rodney Little, MHT

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THE WILSON T. BALLARD COMPANY

TELEPHONE MEMORANDUM

PROJECT: I-270/Watkins Mill Road Extended **DATE:** 1/9/01
FILE NO.: 100-225.01 **TIME:**
CALL TO: Mark Lotz
CALL FROM: Paul Wettlaufer and Steve Elinsky - Corps of Engineers
TELEPHONE NO.:

SUBJECT: Deceleration lane design for MD 124 Exit Ramp with Alternate 3

Paul and Steve called to discuss Alternate 3 and possible design revisions that could avoid the need to relocate the stream along southbound I-270. They asked if the ramp gore could be shifted further south. I responded that it would be very difficult to shift further south because of the already sharp skew of the Watkins Mill Road entrance ramp crossing over top the exit ramp.

They then asked if the deceleration lane could be shortened since it appears that AASHTO only requires 500 feet. We provided 800 feet based on what I recalled to be an SHA general directive. Table X-6 in AASHTO does indicate 510 feet as the minimum deceleration lane length for a 70 mph highway speed and 30 mph ramp speed, which is conservatively what we have in this case. A reduction in deceleration length to approximately 500 feet would substantially reduce, if not eliminate, the need to relocate the stream.

We will confer with SHA regarding how much, if any, the deceleration lane length can be reduced.

By Mark D. Lotz

cc: Ms. Michelle Hoffman
File



Natural Resources Conservation Service

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John Hanson Business Center
339 Busch's Frontage Road, Suite 301
Annapolis, MD 21401

Phone 410-757-0861
Fax 410-757-0687

December 12, 2000

Ms. Cynthia D. Simpson
Deputy Director
Office of Planning and Engineering
Mailstop C-301
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Project No. MO839B11

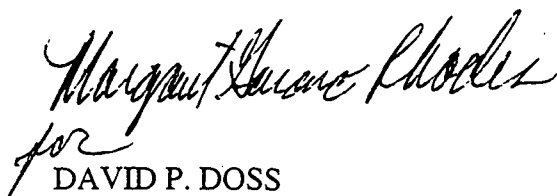
Dear Ms Simpson:

Thank you for the opportunity to review the Environmental Assessment Section 4(f) Evaluation for the I-270 Watkins Mill Road Extended project.

There are two segments of the project area currently used for agricultural production. Both contain prime farmland soils. However, those segments are currently zoned for commercial /industrial research office and/or residential development. Since the project area is essentially within the city limits of Gaithersburg and the entire project area is zoned for residential and/or commercial/industrial research office, the project is exempt from the Farmland Policy Protection Act. Therefore, a Farmland Conversion Impact Rating, Form AD-1006, is not necessary.

If you have questions, please contact JG Warfield, District Conservationist in Montgomery County, at 301-590-2855

Sincerely,

A handwritten signature in cursive script that reads "Margaret Anne Rhodes".

for
DAVID P. DOSS
State Conservationist

cc:

M. Rhodes, ASTC, USDA-NRCS, Annapolis, MD
J. Warfield, DC, USDA-NRCS, Derwood, MD



**Maryland
Department of
Housing and
Community
Development**

*Division of Historical and
Cultural Programs*

100 Community Place
Crownsville, Maryland 21032

410-514-7600

1-800-756-0119

Fax: 410-987-4071

Maryland Relay for the Deaf:

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<http://www.dhcd.state.md.us>

Parris N. Glendening
Governor

Raymond A. Skinner
Secretary

Marge Wolf
Deputy Secretary

October 16, 2000

Mr. Bruce Grey
Deputy Division Chief
Project Planning Division
State Highway Administration
707 North Calvert Street
P.O. Box 717
Baltimore, Maryland 21203-0717

RE: Project No. MO839A11, I-270 at Watkins Mill Road Extended, Montgomery County, Maryland

Dear Mr. Grey:

Thank you for your recent letter, dated 13 September 2000 and received by the Trust on 18 September 2000, regarding the above-referenced project.

IDENTIFICATION AND EVALUATION

Archeology: Your September 13th letter included a draft of the following report for our review: *Phase IB Archeological Survey, I-270 at Watkins Mill Road Extended, Montgomery County, Maryland* (August 2000). John Milner Associates, Inc., prepared the document.

The report comprehensively describes the survey's goals, methods, and results. It is clearly written and addresses the *Standards and Guidelines for Archeological Investigations in Maryland* (Shaffer and Cole 1994). In our opinion, the background research and fieldwork were sufficient to identify the full range of archeological properties in the area of potential effects. The survey discovered two archeological sites and several isolated prehistoric and historic artifacts. The isolated artifacts lack important research potential, are ineligible for the National Register of Historic Places, and warrant no further study. The Casey site (18MO553) measured approximately 15 x 5 m and evidenced five stone flakes. The consultant found no temporally diagnostic artifacts at this prehistoric property. The core of the McGown site (18MO554) was about 50 m in diameter. Shovel testing and unit excavation recovered 159 lithic artifacts, primarily flakes. Milner also found several tools, one of which was a projectile point from the Late Archaic period.

Both sites 18MO553 and 18MO554 are low density lithic scatters from tool reduction. We concur that they have little important research potential and are ineligible for the National Register. Consequently, no further archeological studies are warranted for this project.

We request that the consultant revise the report to include a reference for Wading River projectile points (p. 23).



Mr. Bruce Grey
October 16, 2000
Page 2

Architecture: On October 6, 1999, the Trust concurred with SHA's determination that no standing structures eligible for or listed in the National Register of Historic Places are located in the APE. We continue to concur in that opinion and additional architectural investigations are not warranted.

ASSESSMENT OF EFFECTS

Based on the information provided, the construction of the roadway improvements will have *no effect* on historic properties eligible for or listed in the National Register of Historic Places.

If you have questions or require additional information, please call Ms. Anne Bruder (for structures) at (410) 514-7636 or Dr. Gary Shaffer (for archeology) at (410) 514-7638.

Thank you for your cooperation and assistance.

Sincerely,

Elizabeth J. Cole
Administrator
Project Review and Compliance

EJC/GDS

cc: Dr. Charles Hall (SHA)
Ms. Denise Winslow (FHWA)
Ms. Rita Suffness (SHA)



**Maryland Department of Transportation
State Highway Administration**

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Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

September 13, 2000

RE: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, Maryland
USGS Gaithersburg 7.5" 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 of our finding that there will be no historic properties affected by the proposed project No. MO839A11. The project proposes to provide improved vehicular, pedestrian, bicycle, and transit access to and from the existing transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas of northern Gaithersburg. In addition to roadway improvements, modifications are planned at the Metropolitan Grove MARC Station to facilitate increased transit use. The existing station is underutilized due in part to poor access to the station from I-270, MD 117, and MD 124. This station will also serve the planned Corridor Cities Transitway (CCT) previously investigated during the I-270/US 15 Multi-Modal Study. As a result of preliminary planning analyses and public comment, the following alternates have been retained for detailed study:

No Build:

This alternate consists of routine maintenance, minor construction projects, and developer-based improvements associated with new developments.

Baseline Alternate (Alternate 6) with Options A, B, and C (Watkins Mill Road Extended):

This alternate includes the extension of Watkins Mill Road from MD 117 east across I-270 and connecting to MD 355.

Alternate 2 with Options A, B, C, Mainline Shift Option, Western C-D Shift Option, Braided Ramp Option (Partial Cloverleaf Interchange):

The partial cloverleaf interchange concept consists of a diamond configuration on the northbound

My telephone number is _____

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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

Mr. J. Rodney Little
IS 270 at Watkins Mill Road Extended
Page 2

Alternate 3 with Options B, C, and Braided Ramp Option (Full Diamond Interchange):

The full diamond interchange concept consists of a diamond configuration on both the northbound (east) and southbound (west) sides of I-270. This alternate would use a two-lane C- (east) side of I-270 and a partial cloverleaf configuration on the southbound (west) side of I-270. It would use a two-lane Collector-Distributor (C-D) lane system on each side of I-270 to handle local traffic weaving on and off of I-270.

D lane system on the northbound side of I-270 only. Braided ramps would be used in the southwest quadrant of the interchange due to inadequate weaving distance along southbound I-270.

Alternate 4 with Options A, B, and C (Partial Diamond Interchange):

The partial diamond interchange concept consists of a partial diamond configuration with movements allowed only from Watkins Mill Road Extended to northbound I-270 and from southbound I-270 to Watkins Mill Road Extended. No access would be provided from northbound I-270 to Watkins Mill Road Extended or from Watkins Mill Road Extended to southbound I-270. The I-270 median would be widened to accommodate an elevated HOV interchange with Watkins Mill Road under Option A. An additional general use lane on the southbound (west) side of I-270 may be required.

Access Options:

Option A: HOV Direct Access

This option would provide special access for HOV users to and from Watkins Mill Road Extended in order to reach the Metropolitan Grove MARC Station and future economic development. The inside lane in each direction of I-270 would be an HOV lane. HOV's would have direct access to Watkins Mill Road Extended via a median interchange at Watkins Mill Road Extended separate from the general use traffic.

Option B: Metropolitan Court Extended

This option provides for improved access from I-270 and Watkins Mill Extended for general use traffic to the Metropolitan Grove MARC Station. Access would be through extending Metropolitan Court to Watkins Mill Road just west of the CSX tracks. Bicycle and pedestrian access would be provided alongside Metropolitan Court Extended.

Option C: MD 124 Access Ramp

This option would provide direct access from I-270 to the Corridor Cities Transitway (bus or light rail) Station, as well as a relocated Metropolitan Grove MARC Station on the east side of the CSX tracks, via MD 124. It would also provide an access road for planned economic development on the east side of the CSX tracks to transit. Bicycle and pedestrian access would be provided on the north part of the new access road between the relocated MARC Station and Watkins Mill Road Extended.

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Mr. J. Rodney Little
IS 270 at Watkins Mill Road Extended.
Page 3

Mainline Shift Option

This option applies only to Alternate 2 and proposes to shift the I-270 centerline as much as 45 feet to the east to minimize impacts to the natural environment and wetlands on the west side of I-270. A two-lane C-D system would be used on the northbound side and southbound side of I-270. Additional right of way would be required beyond what is required for Alternate 2.

Western C-D Shift

This option applies only to Alternate 2 and proposes a western C-D lane system shift on both the northbound (east) and southbound (west) sides of I-270. The two-lane C-D lane system for southbound I-270 would be physically separated from mainline I-270 by approximately 500 to 820 (north to south) feet. This should minimize the impacts to the natural environment and wetlands on the west side of I-270.

Braided Ramp Option

The braided ramp option applies only to northbound I-270 between MD 124 and Great Seneca Creek Park, under either Alternate 2 or 3. This option provides a means by which westbound-MD 124 traffic destined for northbound I-270 would not need to weave with northbound I-270 traffic destined for Watkins Mill Road or eastbound MD 124 traffic destined for northbound I-270. This option would take the existing northbound I-270 C-D road, just north of its crossing of MD 124, and shift its alignment to the east in order to cross over top the MD 124 ramp entering northbound I-270. The shifted C-D road would then curve back to the west (limits of disturbance skirt the edges of the two ponds in the Lockheed Martin property) and split, with one lane continuing to Watkins Mill Road and the other merging with I-270 at the proposed Watkins Mill Road bridge. The ramp from Watkins Mill Road to northbound I-270 could then merge onto mainline I-270 prior to the crossing of the Great Seneca Creek Park.

Project plans are included for your review as Attachment I.

Funding

Federal funds are anticipated for this project.

Area of Potential Effects

The area of potential effects (APE) for this project is defined broadly enough to encompass worst case impacts anticipated under all alternatives and options. It anticipates direct and indirect construction, viewshed, and landuse impacts, and is indicated on the attached USGS 7.5" *Gaithersburg, MD*, quadrangle map (Attachment II).

Identification Methods and Results

Potentially significant architectural and archeological resources were both researched as part of the historic investigation instigated by the proposed transportation improvements at Watkins Mill Road.

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Mr. J. Rodney Little
IS 270 at Watkins Mill Road Extended
Page 4

Architecture: SHA Architectural Historian Rita M. Suffness consulted the SHA-GIS quadrangle mapping, and conducted a historic sites reconnaissance. Prior coordination with MHT resulted in a determination that the William Caulfield Farm (M20/38) – the only historic architectural property within the APE – is not eligible for listing on the National Register of Historic Places (Attachment III).

Archeology: SHA archeologist Mary F. Barse assessed the potential of the project area through consultation of SHA GIS mapping, historic mapping, and prior studies, and made a field visit on April 20, 2000. Given the favorable ecological setting of the project area and positive historic map review results, the APE was considered to have high archeological potential for historic and prehistoric resources. Consequently, the archeological consulting firm of John Milner Associates, Inc. was contracted to conduct a Phase I Archeological Identification survey for the project.

Enclosed for your review and comment is one copy of the resulting draft technical report entitled **Phase IB Archeological Survey, I-270 at Watkins Mill Road Extended, Montgomery County, Maryland** (Attachment IV), and a completed NADB Reports Recording Form (Attachment V). Two prehistoric archeological sites (18MO553 and 18MO554) and numerous isolated finds collectively designated 18MOX100 were identified. Site 18MO553 is impacted only by the Western C-D Shift Option. Site 18MO554 is impacted by Alternates 2, 3, 4, the Western C-D Option, the Mainline Shift Option, and the Braided Ramp Option. However, both sites are considered not eligible for inclusion on the National Register of Historic Places by virtue of their low research potential and absence of integrity.

The report has been reviewed by SHA and we believe it clearly conveys that sufficient work was conducted to ascertain an absence of significant historic and prehistoric archeological resources within the APE. We agree with the consultant's recommendation for no additional archeological investigations. Overall, we are pleased with the report's presentation. However, in addition to addressing your comments in the forthcoming final report, we will instruct our consultant to include a discussion of potential impacts from each of the alternatives and options.

Review Request

Please examine the attached maps, plans, and other supporting documentation including a Project Eligibility and Effects Table (Attachment VI). We request your concurrence by October 13, 2000 that there should be no historic properties affected by the proposed transportation improvements at Watkins Mill Road Extended. By carbon copy, we invite the Montgomery County Historic Preservation Commission and Montgomery Preservation, Inc. to provide comments and participate in the consultation process. Pursuant to the requirements 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 © (4) and (6), and 800.3 (f) for information regarding the identification and participation of consulting parties,

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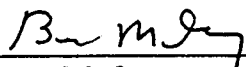
Mr. J. Rodney Little
IS 270 at Watkins Mill Road Extended
Page 5

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, or contact the Maryland State Highway Administration or the Maryland Historical Trust. If no response is received by October 13, 2000, we will assume that these offices decline to participate. Please call Ms. Rita M. Suffness at 410-545-8561 with questions regarding standing structures for this project. Ms. Mary F. Barse can be reached at 410-545-2883 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

CONCURRENCE:

State Historic Preservation Office

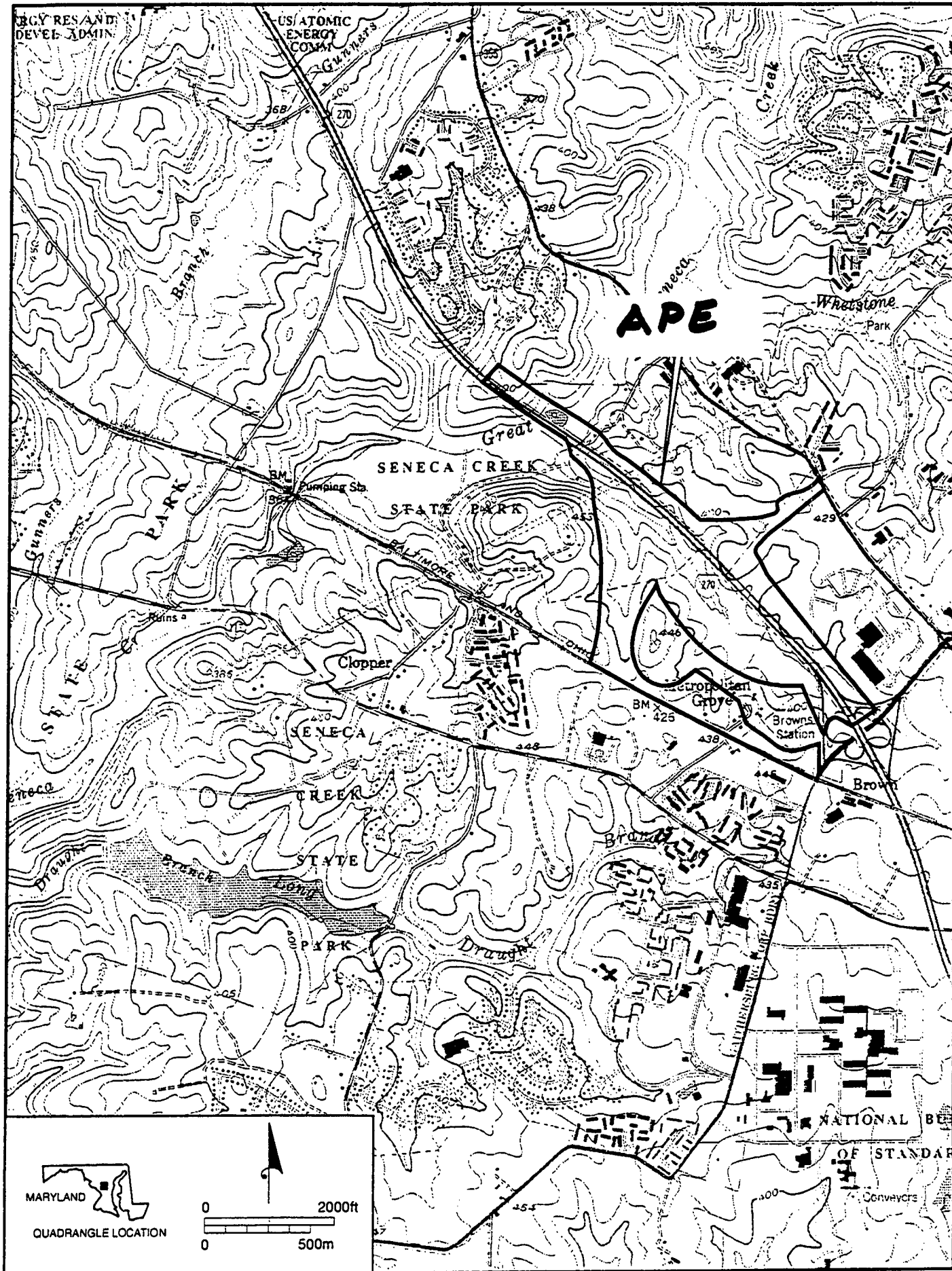
Date

BMG:MFB:lc

Attachments: I) Project Plans
II) USGS 7.5" Gaithersburg, MD quadrangle with APE
III) Previous Coordination Documentation
IV) Phase I Archeological Report
V) NADB Reports Recording Form
VI) Project Eligibility and Effects Table

Mr. J. Rodney Little
IS 270 at Watkins Mill Road Extended
Page 6

cc: Ms. Mary F. Barse (w/ Attachments II and IV)
Ms. Judy Christensen (Montgomery Preservation, Inc.)
(w/ Attachments I through III, and Attachment VI)
Ms Anne Elrays (w/ Attachments II, Attachment IV and Attachment VI)
Dr. Charles Hall
Ms. Michelle D. Hoffman (w/ Attachments I through IV, and Attachment VI)
Mr. Donald H. Sparklin
Ms. Rita Suffness (w/ Attachments II and IV)
Ms. Gwen Marcus Wright (Montgomery County Historic District Commission)
(w/ Attachments I through III, and Attachment VI)



Project area depicted on USGS Gaithersburg, MD. 7.5 minute quadrangle (1945, photorevised 1979).

Mr. J. Rodney Little
IS 270 at Watkins Mill Road Extended
Attachment VI

Hybrid Eligibility/Effect Table

Project Name IS 270 At Watkins Mill Road Extended

September 12, 2000

Resource	Type	SHA NR Det.	SHPO Opinion	Alternate #6 Baseline		Alternate 2#		Alternate #3		Alternate #4		Attachment	Remarks
				Impact	SHPO Concur	Impact	SHPO Concur	Impact	SHPO Concur	Impact	SHPO Concur		
William Caulfield Farm (M20/38)	S	X	10/06/99 (NE)	N/A		N/A		N/A		N/A		IV	Impacted by Western C- D Shift Option; Alternates 2, 3, and 4
18MO553	A	X	Requested 09/11/00	None	Requested 09/11/00	None	Requested 09/11/00	None	Requested 09/11/00	None	Requested 09/11/00		Impacted by Western C- D Shift Option
18MO554	A	X	Requested 09/11/00	None	Requested 09/11/00	None	Requested 09/11/00	None	Requested 09/11/00	None	Requested 09/11/00		Impacted by Western C- D Shift Option; Mainline Shift Option, Alternates 2, 3, and 4
Effect				NPA	Requested 09/11/00	NPA	Requested 09/11/00	NPA	Requested 09/11/00	NPA	Requested 09/11/00		

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Impact: None, No Adverse, Adverse

Effect: NPA (No Properties Affected), NAE (No Adverse Effect), AE (Adverse Effect)

Bold rows indicate review action requested



Maryland Department of Transportation
State Highway Administration

July 25, 2000

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

RE: Project No. MO 839B11
Watkins Mill Road Extended and
I-270 Interchange Project
Montgomery County, Maryland

Ms. Diane Franks
Air and Radiation Management Administration
Maryland Department of the Environment
2500 Broening Highway
Baltimore MD 21224

Dear Ms. Franks:

Enclosed for your review and comment is a copy of the Air Quality Analysis for the Watkins Mill Extended and the I-270 Interchange project. Your comments are requested by August 28, 2000.

Please respond to:

Donald H. Sparklin
Assistant Division Chief
Project Planning Division
Mailstop C-301
Maryland State Highway Administration
707 North Calvert Street
Baltimore MD 21202
Attn: Mr. Gary Green

Very truly yours,

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

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

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Ms. Diane Franks
Watkins Mill Road Extended
Page Two

by: Donald H. Sparklin
Donald H. Sparklin
Assistant Division Chief
Project Planning Division

Enclosure

cc: Ms. Anne Elrays
Mr. Gary Green
Mr. Joseph Kresslein
Mr. Greg Wolf

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THE WILSON T. BALLARD COMPANY

TELEPHONE MEMORANDUM

PROJECT: I-270@WATKINS MILL ROAD EXTENDED DATE: MARCH 30, 2000
FILE NO.: 0100-225.06 TIME: 2:25
CALL TO: PAT HEAPHY (Seneca Creek State Park Manager)
CALL FROM: GEORGE FLEAGLE
TELEPHONE NO.: 1-301-924-2127

SUBJECT: IMPACTS TO SENECA CREEK STATE PARK

As per a request from Anne Elrays, Pat Heaphy was contacted to discuss the impacts to Seneca Creek State Park resulting from the Alternates Retained for Detailed Study (ARDS).

The mapping provided in the ARDS Package concentrated on the Watkins Mill Road interchange area and did not show the area just north of Seneca Creek where the Park is located. I described the proposed improvements and resulting impacts to the Park for each of the ARDS. Pat understood the impacts to the Park resulting from the ARDS.

Pat informed us that the Seneca Creek State Park extended from the Potomac River to MD 355, a distance of approximately 15 miles and encompassed over 6200 acres. North of MD 355 it is Great Seneca Park and run by the Maryland-National Capital Park and Planning Commission. WTB will update our mapping to show "Seneca Creek State Park" south of MD 355 and "Great Seneca Park" north of MD 355.

By George Fleagle

cc: Ms. Hoffman
Ms. Elrays



Parris N. Glendening
Governor

Maryland Department of Natural Resources
Forest, Wildlife and Heritage Service
Tawes State Office Building
Annapolis, Maryland 21401

Sarah J. Taylor-Rogers
Secretary

Stanley K. Arthur
Deputy Secretary

February 11, 2000

Mr. Jason A. McNees
Straughan Environmental Services, Inc.
3905 National Drive, Suite 105
Burtonsville, MD 20866

RE: Watkins Mill Road/I-270 Interchange, Environmental Assessment,
Montgomery County.

Dear Mr. McNees:

The Wildlife and Heritage Division has no records for Federal or State rare, threatened or endangered plants or animals within this project site. This statement should not be interpreted as meaning that no rare, threatened or endangered species are present. Such species could be present but have not been documented because an adequate survey has not been conducted or because survey results have not been reported to us.

However, the Wildlife and Heritage Division's Natural Heritage database indicates that there are records for species of concern known to occur within the vicinity of the project site. These species could potentially occur on the project site itself, especially if the appropriate habitat exists. They are:

<u>Scientific Name</u>	<u>Common Name</u>	<u>State Status</u>
<i>Botaurus lentiginosus</i>	American Bittern	In Need of Conservation
<i>Polygonum opelousanum</i>	Opelousus Smartweed	Uncertain

Also, the forested area on the project site 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 this 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:

1. Concentrate development to nonforested areas.

- 210
2. If forest loss or disturbance is absolutely unavoidable, concentrate or restrict development to the perimeter of the forest (i.e., within 300 feet of the existing forest edge), particularly in narrow peninsulas of upland forest less than 300 feet wide.
 3. Limit forest removal to the "footprint" of houses and to that which is absolutely necessary for the placement of roads and driveways.
 4. Wherever possible, minimize the number and length of driveways and roads.
 5. Roads and driveways should be as narrow and short as possible; preferably less than 25 feet and 15 feet, respectively.
 6. Maintain forest canopy closure over roads and driveways.
 7. Maintain forest habitat up to the edges of roads and driveways; do not create or maintain mowed grassy berms.
 8. Maintain or create wildlife corridors (for details, see Critical Area Commission's Guidance Paper on Wildlife Corridors).
 9. 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.
 10. Afforestation efforts should target (1) riparian or streamside areas that lack woody vegetation, (2) forested riparian areas less than 300 feet, and (3) gaps or peninsulas of nonforested habitat within or adjacent to existing FIDS habitat.

For additional assistance, please contact David Brinker, Central Regional Ecologist for the Wildlife and Heritage Division, at (410) 744-8939, or write: 1200 Frederick Road, Catonsville, MD 21228.

Sincerely,

Michael E. Slattery
MS

Michael E. Slattery,
Director,
Wildlife & Heritage Division

ER# 2000.0084.mo



211
RECEIVED
TRAVEL FORECASTING SECTION

00 JAN -7 11 1:01

JOB NO.

January 6, 2000

Mrs. Mona Sutton
Travel Forecasting Section
Project Planning Division
State Highway Administration
707 North Calvert Street
Baltimore, Maryland

Mona,

I have pulled out the sections of the Gaithersburg Master Plan that discusses the staging of the development activity within the "Study Area" for West Watkins Mill Road Extended. There wasn't a real easy way to put this in a chart and I know you would like to develop some traffic numbers as soon as possible. I think the Master Plan does a good job of explaining the various staging. As we have indicated previously, most of the development within the entire "Study Area" can occur regardless of the interchange. I have highlighted the "Map Designations" (as they are referred to in our Master Plan) that have some type staging activity in conjunction with the transportation improvements to Watkins Mill Road. As you will see, the amount of development subject to the staging constraints is a small portion of the potential development for the entire study area.

If you have any further questions please feel free to contact me by phone (301) 258-6330 or by email esoter@ci.gaithersburg.md.us.

Sincerely,

Eric E. Soter
Planner

Cc: File

City of Gaithersburg • 31 South Summit Avenue, Gaithersburg, Maryland 20877-2098
301-258-6300 • FAX 301-948-6149 • TTY 301-258-6430 • cityhall@ci.gaithersburg.md.us • www.ci.gaithersburg.md.us

MAYOR
Sidney A. Katz

COUNCIL MEMBERS
Stanley J. Alster
Sharon B. Bohrer
Charles F. Davis
Geraldine E. Edens
Ann T. Somerset

CITY MANAGER
David B. Hampton

VI A-31

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INTRODUCTION TO STUDY AREA 11 AND 12

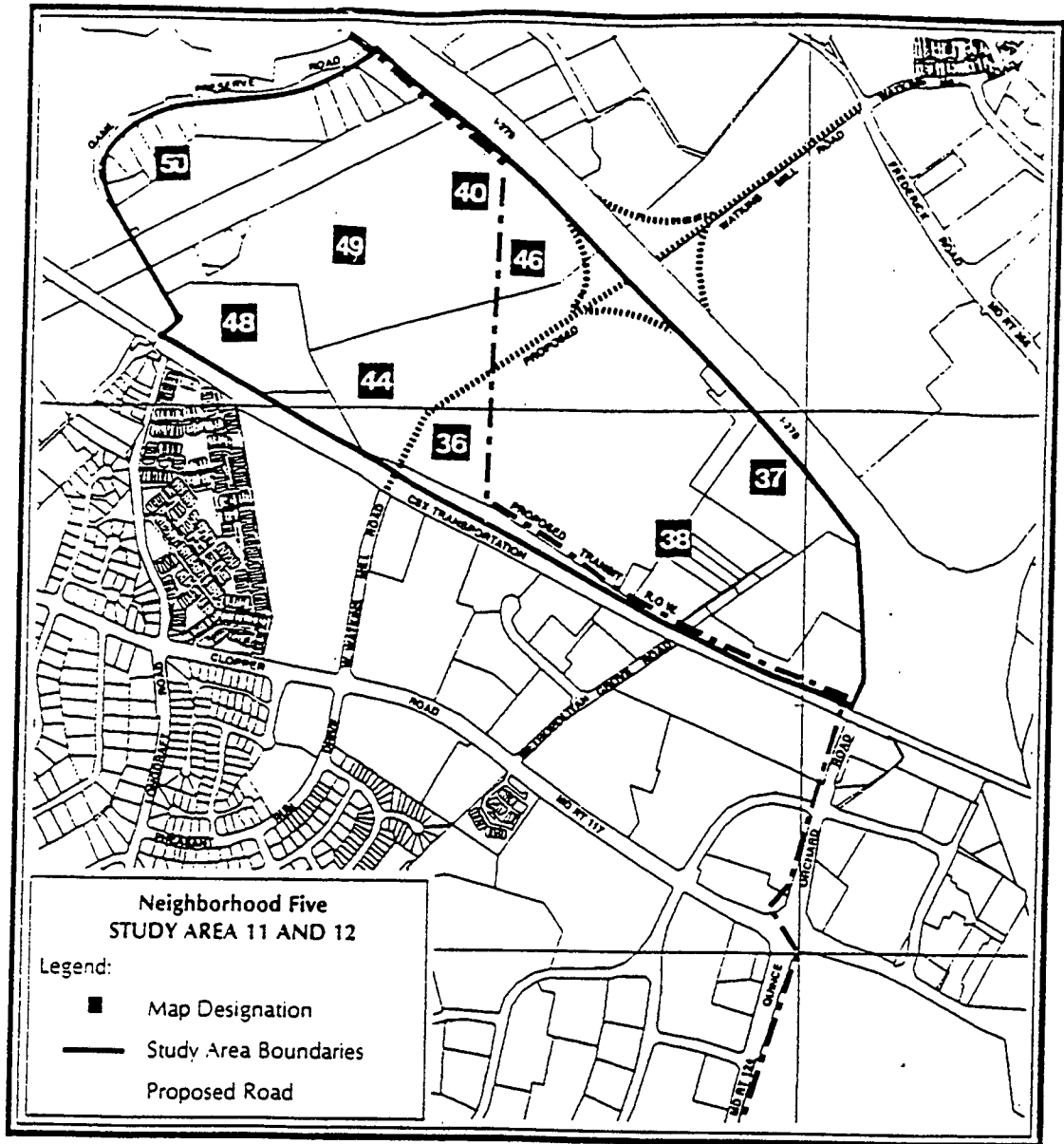
The following two study areas, Study Areas 11 and 12, offer the greatest opportunity for future development in Neighborhood Five. Both of these study areas are almost entirely made up of vacant land waiting to be developed. The draft report on these two study areas reflects the recommendation of the Gaithersburg planning staff to cluster high density in and around an existing and planned transit stop.

There are certain assumptions that must be made while studying these two areas. The first is that West Watkins Mill Road would be constructed from the current intersection of Watkins Mill Road and Frederick Avenue, across Interstate 270 and the CSX rail line to meet up with the existing terminus of West Watkins Mill Road. Another assumption is the dedication of right-of-way and construction of a busway or light-rail line through these two study areas.

The original staff draft release, dated July 1994, contained three scenarios for Study Area 11 with map designation numbers 28 through 38, and for Study Area 12, five scenarios, with map designation numbers 39 through 51. These scenarios presented all possible options of land use for both study areas. However, it became evident from public hearings and work sessions that a combination of all the scenarios would be more advantageous for the City. The full text of the staff draft report, dated July 1994, for these scenarios, which include map designations 28 through 51, is available at the Planning and Code Administration in City Hall. To view a summary of all scenarios in Study Areas 11 and 12 see table titled *Adopted Land Use Designations and Comprehensive Rezoning* beginning on page 42.

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STUDY AREA 11 AND 12



Total Area: 155.0 Acres
 Predominant Land Use: Vacant land

This study area is bounded by Interstate 270 to the north and east, the CSX rail line right-of-way to the south, and the proposed right-of-way for Watkins Mill Road Extended to the west. Study Area 11 contains several large pieces of property. The largest, part of P910, owned by the Casey Trust, is roughly 100 acres. The City of Gaithersburg and Montgomery County own a total of 31 acres. There are several smaller one-acre lots with individual owners located just north of the unimproved portion of Metropolitan Grove Road north of the CSX tracks. The Montgomery County property and several of the smaller lots are being used for automobile storage. The rest of this study area including the City-owned land is vacant.

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The parcels owned by Montgomery County (P435) and City of Gaithersburg (P138, P404) contain a covenant that limits development to a public use. The covenant states that the parcels are to be used solely for a public use approved by the Board of Public Works of Maryland. This covenant is recorded in Montgomery County Land Records, Liber 5765 and Folio 508 (see Appendix). The board of Public Works would have to amend the covenant to allow private development.

The following map designations will list the language for each specific land use proposal. For historical purposes the original staff proposal is summarized in the Land Use Plan Table on page 40 of this text.

Land use options, identified by map designation numbers on the Study Area 11 and 12 map on page 34, and listed in the chart beginning on page 42, are described below. A sketch plan for the proposed development in Study Areas 11 and 12 can be found in the Neighborhood Five Exhibit File located in the Planning and Code Administration in City Hall.

Land Use Options

28-35 **Eliminated.** These map designations were eliminated through the public hearing and work session process and are not part of the final adopted plan.

36 **Redesignate** part of P910 from industrial-research-office to **commercial-office-residential** (Map Designation 36). This designation may include a highway-oriented use, such as a bank, service stations, or other convenience shopping use, only after construction of the West Watkins Mill Road over the CSX rail line to provide access to the site. This parcel could also contain a transit related parking structure possibly utilizing both public and private funds.

Land Use and Zoning Actions

- Adopted commercial-office-residential designation
- Parcel rezoned to MXD

37 **Redesignate** part of parcels P910, P138, P404, P33, and P435 from industrial-research-office to **open space** (Map Designation 37). The open space designation on these 40 acres will be linked to any development in Study Area 11. The exact delineation of the boundaries for the open space will be determined at the time of a submission of a schematic development plan for neighboring Map Designation 38.

Land Use and Zoning Actions

- Adopted open space designation
- Parcels rezoned to MXD

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- 38** Redesignate part of parcels P910, P435, P33, and P138, plus all of parcels, P310, P211, P238, P241, P304, P305, P342, P398, P295, N301, and N396 from industrial-research-office to **commercial-office-residential** (Map Designation 38). This designation will be affixed to this map designation to allow the following development to occur in phases only after a traffic study is deemed acceptable to the City traffic engineer. This plan reflects the desire of the City to cluster density around the proposed transit station in this map designation relative to high-rise residential development. Density will decrease outward from the transit stop.

It is the intent of this land use plan to allow 600 base residential units in this map designation. However, certain infrastructure improvements must occur before development can proceed. West Watkins Mill Road must be extended across the CSX rail line into the site to achieve this base density. An additional 250 units will be permitted if West Watkins Mill Road is completed to Interstate 270. An increase of 400 additional units will be permitted if an interchange at West Watkins Mill Road and Interstate 270 is in place, and an additional 250 units if a transitway (light rail or busway) is constructed.

In regards to commercial activity, development will be allowed to occur if the following are constructed:

- West Watkins Mill Road extended from the CSX rail line to Interstate 270 with two access points into the study area will permit a mixed use development with a FAR of .4 not to exceed 700,000 square feet of office/retail space.
- West Watkins Mill Road must be open to traffic from the CSX rail line over Interstate 270 to intersect with Frederick Avenue (MD Route 355), and a grade separated crossing for Metropolitan Grove Road with internal access link to West Watkins Mill Road for an additional 500,000 square feet of office/retail space.
- An interchange at West Watkins Mill Road and Interstate 270 will allow for an increase in density of an additional 300,000 square feet of office/retail space.
- The dedication of right-of-way must be conveyed to Montgomery County for the Shady Grove/Clarksburg Transitway for light rail or busway and construction begun before an additional 200,000 square feet of office/retail space is permitted.

Land Use and Zoning Actions

- Adopted commercial-office-residential designation with the above stated housing, and office/retail square footage caps, and infrastructure improvements.
- Parcels rezoned to MXD

- 39** **Eliminated.** This map designation was eliminated through the public hearing and work session process and is not part of the final adopted plan.

- 40** **Designate** part of parcels P910, and P707, plus all of parcels P561, P715, P717, P800, and property owned by the State of Maryland as **open space** (Map Designation 40). Reserve 27 acres as open space to preserve wetlands, steep slopes, and heavily forested areas. Exact boundaries will be determined by way of a natural resources inventory.

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Land Use and Zoning Actions

- Adopted open space designation
- Parcels within the City limits rezoned MXD

41-43 **Eliminated.** These map designations were eliminated through the public hearing and work session process and are not part of the final adopted plan.

44 **Designate** part of parcels P910, and P21 as **commercial-industrial-research-office** (Map Designation 44). This designation will allow commercial development to occur if West Watkins Mill Road is constructed over the CSX rail line into the site. A retail center of 150,000 square feet may be constructed following acceptance of a traffic study.

Land Use and Zoning Actions

- Adopted commercial-industrial-research-office designation as proposed
- Parcels within the City limits rezoned MXD

45 **Eliminated.** This map designation was eliminated through the public hearing and work session process and is not part of the final adopted plan.

46 **Redesignate** part of parcels P910, and P707 as **commercial-industrial-research-office** (Map Designation 46). This designation could allow an office or a hotel conference center on approximately 5 acres at varying densities depending on the following:

- An office building or hotel equaling 300,000 square feet would be allowed only if West Watkins Mill Road is extended to the edge of the Interstate 270 right-of-way.
- An office building and hotel to include a maximum of 600 rooms, an 80,000 square foot conference center also to include 40,000 square feet of commercial/retail space would be permitted after West Watkins Mill Road is extended from the CSX rail line over I-270 to intersect with Frederick Avenue.
- The development of an office building, hotel and additional conference center will be permitted only after West Watkins Mill Road is extended from the CSX rail line over Interstate 270 with direct access from Interstate 270 by way of an interchange at the bridge of West Watkins Mill Road.

Land Use and Zoning Actions

- Adopted commercial-industrial-research-office designation with the above stated square footage caps and phasing plan.
- Parcels within the City limits rezoned to MXD

47 **Eliminated.** This map designation was eliminated through the public hearing and work session process and is not part of the final adopted plan.

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- 48&49** Designate part of parcels P707, and P21 and parcel P880 as **mixed residential** (Map Designations 48 and 49). Development may occur only after West Watkins Mill Road is constructed over the CSX rail line. The maximum housing unit count on this 44-acre parcel for all dwellings will be 300 with 50 percent being single-family detached and 50 percent single-family attached units equaling 7 units per acre.

Land Use and Zoning Actions

- Adopted mixed residential designation with above stated unit cap and dwelling unit mix
- Parcels to be zoned MXD if annexed into the City

- 50** Designate parcels P582, P408, P477, P695, N354, N410, N411, N453, N475, N531, N532, N534, N546, and N601 as **low density residential** (Map Designation 50). Single-family detached units on one-acre lots would be permitted with access from Game Preserve Road.

Land Use and Zoning Actions:

- Adopted low density residential if annexed into City
- Parcels to be zoned R-90 if annexed into the City

- 51** **Eliminated.** These map designations were eliminated through the public hearing and work session process and are not part of the final adopted plan.

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STAGING PLAN

The development envisioned in this land use plan is not currently expected to build out in the next ten years and, to avoid piecemeal development, one amended sketch plan including all public improvements and approximate siting of buildings should be submitted according to the staging elements below.

The implementation of staging elements for this plan will be controlled by the approval process for the Mixed Use Development (MXD) Zone through the schematic development plan (SDP) approval process. This process requires the Mayor and City Council, and the Planning Commission to approve all final decisions on SDP's. Any development in Study Areas 11 and 12 will subsequently be reviewed by the Planning Commission subject to the site development review process required for all types of development in the City. Phasing of development and the total square footage and number of housing units for each phase will not be approved until a traffic impact study is submitted to the Department of Planning and Code Administration and its conclusions acceptable to the City traffic engineer. A traffic impact study must demonstrate that critical intersections and links of roads (existing and planned) will operate at acceptable levels of service. The traffic generated by the proposed development, plus all approved subdivisions and all other current uses, shall operate at a mid-point level of service E; an acceptable level of service. The level of service standard assumes that it is the level at which the transportation facilities will operate satisfactorily at maximum capacity. The traffic impact study should be prepared utilizing: (1) the standard ITE trip generation rates, (2) local trip distribution patterns based on good traffic engineering practices, and (3) the Critical Lane Analysis method to determine acceptable levels of service or any other method readily acceptable.

MASTER PLAN TRANSPORTATION LINKAGES

With respect to the master planned roads, transit options, bike paths, and pedestrian walkways, a detailed evaluation of rights-of-way and paving widths, road classifications, and design criteria will be conducted during the anticipated update of the city-wide transportation element of the master plan. However, during the course of review of various map designations, recommendations relative to certain existing and proposed master planned roadways were necessary within the context of the planned land use decisions. The following conclusions were reached:

Study Areas 11 and 12

West Watkins Mill Road, as an arterial roadway with 120 feet of right-of-way, will be a maximum six-lane roadway with pedestrian and bicycle capacity. Two access points will be reserved along West Watkins Mill Road for ingress/egress of Study Areas 11 and 12.

Metropolitan Grove Road is proposed as an improved street with a grade separated crossing over the CSX rail line with an internal access road linking to West Watkins Mill Road.

The reservation of right-of-way for the construction of a transitway along the CSX railroad and the Metropolitan Grove MARC Rail Station, to traverse the Casey Property, and continue north along Interstate 270 must be executed. This transportation improvement is crucial to accommodate the levels of development recommended in this plan, and the Montgomery County Master Plans for Shady Grove and Germantown.

Direct access from Interstate 270, by way of an interchange, to link with West Watkins Mill Road is an important part of the transportation linkages.

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NEIGHBORHOOD FIVE SUMMARY OF ESTIMATED POPULATION

Study Area	Existing Population	Population Added With Committed Units	Population Added With Future Units	Total
1	260	0	-	260
2	9	0	-	9
4	1,843	-	-	1,843
5	422	95	-	517
6	1,279	-	35	1,314
7	673	286	-	959
8	3,191	86	-	3,277
9	1,610	-	-	1,610
10	1,024	-	38	1,062
11	-	-	6,203	6,203
12	-	-	717	717
TOTAL	10,311	467	6,993	17,771

Note: Population estimates have been derived by utilizing the following standards:

- 3.15 persons/dwelling unit for single family detached
- 2.89 persons/dwelling unit for single family attached
- 2.17 persons/dwelling unit for multifamily

LAND USE CLASSIFICATION HIERARCHY

Low Density Residential
 Medium-Low Density Residential
 Medium Density Residential
 High Density Residential
 Mixed Residential
 Residential-Office
 Commercial-Office-Residential
 Mixed Use
 Commercial
 Commercial-Industrial-Research-Office
 Industrial-Research-Office
 Industrial
 Institutional
 Institutional-Residential
 Open Space

ZONING CATEGORIES

R-A	Low Density Residential (maximum density: 2 units per acre)
R-90	Medium Density Residential (maximum density: 3.5 units per acre)
R-6	Medium Density Residential (maximum density: 6 units per acre)
RP-T	Medium Density Residential (maximum density: 9 units per acre)
R-18	Medium Density Residential (maximum density: 18 units per acre)
R-20	Medium Density Residential (maximum density: 21.5 units per acre)
R-H	High Density Residential (maximum density: 54 units per acre)
R-O	Planned Residential
R-B	Residential Buffer
C-B	Commercial Buffer
C-1	Local Commercial
C-2	General Commercial
C-3	Highway Commercial
CBD	Central Business District
C-P	Commercial Office Park
MXD	Mixed Use Development
E-1	Urban Employment
E-2	Moderate Intensity Industrial Park
I-1	Light Industrial
I-3	Industrial and Office Park
I-4	General Industrial

NEIGHBORHOOD FIVE

LAND USE PLAN DESIGNATIONS AND COMPREHENSIVE REZONING
1996

MAP DESIG	STUDY AREA	SUBDIVISION/ PARCEL/LOT	ACRES	PROPERTY OWNERS	1994 ZONING	1974 LAND USE DESIGNATION	1994 DRAFT PLAN LAND USE DESIGNATION	PLANNING COMMISSION RECOMMENDATION	MAYOR & COUNCIL ADOPTION	ADOPTED ZONING
1	1	N746	2.23	City of Gaithersburg, Mont Co.	C-2	Comm	High Den Res	Inst	Inst	C-2
2	1	Part of N770 Lot 10	1.06	McDonald Corporation	C-2	Comm	Comm	Comm	Comm	C-2
3	1	N962, N904	2.21	Quince Tree Assoc. Partnership	C-2	Comm	Comm	Comm	Comm	C-2
4	1	N39	6.46	Quince Tree Assoc. Partnership	C-2	Ind-Rsch-Off	Comm	Comm	Comm	C-2
5	2	P15, P41, P67	2.60	Craig Dart Howard M. Mills	R-200 (County)	Low Den Res (County)	Low Den Res (Opt A) Res-Off (Opt B) Comm-Off-Res (Opt C) Comm (Option D)	Comm-Off-Res	Comm-Off-Res	
6	3	Lot 1 Block C	2.20	One Bank St. Ltd. Partnership	E-1	Ind-Rsch-Off Comm (Opt B)	Ind-Rsch-Off (Opt A)	Comm	Comm	C-2
7	3	Part of Lot 2 Block C	3.30	Watkins-Johnson	E-1	Ind-Rsch-Off	Ind-Rsch-Off (Opt A) Comm (Opt B)	Comm	Comm	C-2
8	3	P551	1.84	United States Postal Service	E-1	Ind-Rsch-Off	Inst	Inst	Inst	E-1

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MAP DESIG	STUDY AREA	SUBDIVISION/ PARCEL/LOT	ACRES	PROPERTY OWNERS	1994 ZONING	1974 LAND USE DESIGNATION	1994 DRAFT PLAN LAND USE DESIGNATION	PLANNING COMMISSION RECOMMENDATION	MAYOR & COUNCIL ADOPTION	ADOPTED ZONING
9	4	P105	6.30	Diamonds Farms HOA	R-A	Open Space	Med Den Res	Med Den Res	Med Den Res	RP-1
10	4	P106, P107	9.00	Montgomery County Players	R-A	Open Space	Inst	Inst	Inst	R-A
11	4	N56, N60, N78 N128, N131 N135, Outlot A	13.87	Quadrangle Developement	MXD	-	Ind-Rsch-Off	Comm-Ind-Rsch-Off	Ind-Rsch-Off	MXD
12	4	Fernshire Farms Subdivision	100.00	Multiple Owners	RP-T	-	Med Den Res	Med Den Res	Med Den Res	RP-1
13	4	Hidden Orchard Subdivision	9.30	Multiple Owners	R-90	-	Low Den Res	Low Den Res	Low Den Res	R-90
14	5	Bridlewood Subdivision	50.00	Multiple Owners	R-90	Res	Low Den Res	Low Den Res	Low Den Res	R-90
15	5	N355, N399	4.63	Madison Homes	RP-T	-	Med Den Res	Med Den Res	Med Den Res	RP-1
16	6	P458, P461 State Parcel	7.86	HCM Investments State of Maryland	R-90 (County)	Low Den Res (County)	Low Den Res Open Space	Low Den Res/ Open Space	Low Den Res/ Open Space	R-90 Cluster
17	6	Hunter's Trace Subdivision	9.55	Multiple Owners	R-90	High Den Res	Low Den Res	Low Den Res	Low Den Res	R-90

Abbreviations: *Comm* = Commercial
 Den = Density

Ind = Industrial
Inst = Institutional

Med = Medium
Off = Office

Opt = Option
Rec = Recreational

Res = Residential
Rsch = Research

* Map Designations without a Planning Commission recommendation in Study Areas 11 and 12 have been eliminated through the public hearing and work session process and are not part of the final adopted plan.

NOTE: Map Designations with Planning Commission recommendation but without adopted zoning are parcels outside the City limits.

2/2/22

MAP DESD.	STUDY AREA	SUBDIVISION/ PARCEL/LOT	ACRES	PROPERTY OWNERS	1994 ZONING	1974 LAND USE DESIGNATION	1994 DRAFT PLAN LAND USE DESIGNATION	PLANNING COMMISSION RECOMMENDATION	MAYOR & COUNCIL ADOPTION	ADOPTED ZONING
18	7	Orchard Hills Subdivision	22.00	Centex Homes	R-6	Med Den Res	Med-Low Den Res	Med-Low Den Res	Med-Low Den Res	R-6
19	7	Parcels X-1, X-2 Y-1 and Y-2	24.00	Tech Park 270 Partnership (Mulligan & Griffin)	E-1	Med Den Res	Ind-Rsch-Off	Ind-Rsch-Off	Ind-Rsch-Off	E-1
20	8	P750	5.00	Madison Homes	RPT	-	Med Den Res	Med Den Res	Med Den Res	R-6
21	8	Parcel B	17.00	City of Gaithersburg	R-A	Open Space Med Den Res	Inst	Inst	Inst	R-A
22	8	201 Lot 1, Block D	5.00	Diamond Farms Enclave Partnership	C-1	Med Den Res	Comm	Comm	Comm	C-1
23	9	P564, N368	22.24	State of Maryland Montgomery County	I-3	Vacant Farm	Inst	Inst	Inst	R-A
24	9	N459, N243	21.0	Weinschel Co. Clopper Road Assoc.	I-3	-	Ind-Rsch-Off	Ind-Rsch-Off	Ind-Rsch-Off	I-3
25	10	N250	28.83	Clopper Road Assoc.	I-3	-	Ind-Rsch-Off	Ind-Rsch-Off	Ind-Rsch-Off	I-3
26	10	Game Preserve Woods Subdivision	3.54	Built Form Homes	R-90	-	Low Den Res	Low Den Res	Low Den Res	R-90
27	10	Dorsey Estates Subdivision	3.50	Multiple Owners	R-10	-	Med Den Res	Med Den Res	Med Den Res	R-10
28	11	P435, P138 P404	32.00	City of Gaithersburg Montgomery County	R-A	Open Space	Open Space	Eliminated*		
29	11	P398, P396, P295, P305, P304 P241, P238, P33 N396, N301	24.5	See Map Designation 38	I-1	Ind-Rsch-Off	Ind-Rsch-Off	Eliminated*		

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MAP DESIG	STUDY AREA	SUBDIVISION/ PARCEL/LOT	ACRES	PROPERTY OWNERS	1994 ZONING	1974 LAND USE DESIGNATION	1994 DRAFT PLAN LAND USE DESIGNATION	PLANNING COMMISSION RECOMMENDATION	MAYOR & COUNCIL ADOPTION	ADOPTED ZONING
30	11	P211, P33 part of P910	100.00	Casey Trust	I-3	Ind-Rsch-Off	Ind-Rsch-Off	Eliminated*		
31	11	P138 part of P404	17.00	City of Gaithersburg Casey Trust	R-A I-3	Open Space Ind-Rsch-Off	High Den Res	Eliminated*		
32	11	P33, part of P910	21.00	Casey Trust	I-3	Ind-Rsch-Off	Med Den Res	Eliminated*		
33	11	part of P910	60.00	Casey Trust	I-3	Ind-Rsch-Off	Ind-Rsch-Off	Eliminated*		
34	11	P230, P241 P304, P305 N396, N301 P295, part of P404	47.00	See Map Designation 38	F-1 R-A	Open Space Ind-Rsch-Off	Comm	Eliminated*		
35	11	part of P910	27.80	Casey Trust	I-3	Ind-Rsch-Off	Ind	Eliminated*		
36	11	part of P910	4.00	Casey Trust	I-3	Ind-Rsch-Off	Comm	Comm-Off-Res	Comm-Off-Res	MXD
37	11	P435, P138 P33, P211 part of P404 and P910	122.00	City of Gaithersburg Montgomery County Casey Trust	R-A I-3	Open Space Ind-Rsch-Off	Mixed Res	Open Space	Comm-Off-Res	MXD

Abbreviations: *Comm* = Commercial *Ind* = Industrial *Med* = Medium *Opt* = Option *Res* = Residential
 Den = Density *Inst* = Institutional *Off* = Office *Rec* = Recreational *Rsch* = Research

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NOTE: Map Designations with Planning Commission recommendation but without adopted zoning are parcels outside the City limits.

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MAP DESIG	STUDY AREA	SUBDIVISION/ PARCEL/LOT	ACRES	PROPERTY OWNERS	1994 ZONING	1974 LAND USE DESIGNATION	1994 DRAFT PLAN LAND USE DESIGNATION	PLANNING COMMISSION RECOMMENDATION	MAYOR & COUNCIL ADOPTION	ADOPTED ZONING
38	11	P305, P304 P241, P238 N396, N301 P295, part of P910 P398, P310, P342	75.00	William Lee Sovran Bank Montgomery County William Busche Charles Vaughn Conrad Mills Richard Howard Gertrude Stevenson	F-1 F-3	Ind-Rsch-Off	Comm/Ind-Rsch-Off	Comm-Off-Res	Comm-Off-Res	MXD
39	12	part of P910 P880, P21	40.00	Casey Trust	F-3	Ind-Rsch-Off	Ind-Rsch-Off	Eliminated*		
40	12	Part of P910	5.00	Casey Trust	F-3	Ind-Rsch-Off	Open Space	Open Space	Open Space	R - A
41	12	Part of P910	15.00	Casey Trust	F-3	Ind-Rsch-Off	Comm	Eliminated*		
42	12	P21, P880 Part of P910	20.00	Casey Trust	F-3	Ind-Rsch-Off	Ind-Rsch-Off	Eliminated*		
43	12	Part of P910	5.00	Casey Trust	F-3	Ind-Rsch-Off	Open Space	Eliminated*		
44	12	Part of P910 Part of P21	15.00	Casey Trust Devlin Lumber	F-3	Ind-Rsch-Off	Comm	Comm/ Ind-Rsch-Off	Comm/ Ind-Rsch-Off	MXD
45	12	Part of P910 P880	10.00	Casey Trust	F-3	Ind-Rsch-Off	Ind-Rsch-Off	Eliminated*		
46	12	Part of P910	24.00	Casey Trust A.B. McGown	F-3	Ind-Rsch-Off	Open Space	Comm/ Ind-Rsch-Off	Comm/ Ind-Rsch-Off	MXD
47	12	Part of P910	15.00	Casey Trust	F-3	Ind-Rsch-Off	Comm	Eliminated*		
48	12	P21, P880, P800 P717, P707 part of P910 P715, Part of P21	40.00	Casey Trust A.B. McGown Devlin Lumber	F-3	Ind-Rsch-Off	Ind-Rsch-Off	Mixed Res	Mixed Res	MXD

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MAP DESIG	STUDY AREA	SUBDIVISION/ PARCEL/LOT	ACRES	PROPERTY OWNERS	1994 ZONING	1974 LAND USE DESIGNATION	1994 DRAFT PLAN LAND USE DESIGNATION	PLANNING COMMISSION RECOMMENDATION	MAYOR & COUNCIL ADOPTION	ADOPTED ZONING
49	12	Part of P707	40.00	A.B. McGown	I-3	Off/Light Ind (County)	Med Den Res	Mixed Res	Mixed Res	MIX1
50	12	P582	17.00	A.B. McGown	R-200 (County)	Low Den Res (County)	Low Den Res	Low Den Res	Low Den Res	R 90
51	12	Game Preserve Road (12 lots)	12.00	A.B. McGown	R-200 (County)	Low Den Res (County)	Low Den Res	Eliminated*		
52	12	Part of P910	25.00	Casey Trust A.B. McGown	I-3	Ind-Rsch-Off	Ind-Rsch-Off	Eliminated*		

Abbreviations: *Comm* = Commercial
 Den = Density

Ind = Industrial
Inst = Institutional

Med = Medium
Off = Office

Opt = Option
Rec = Recreational

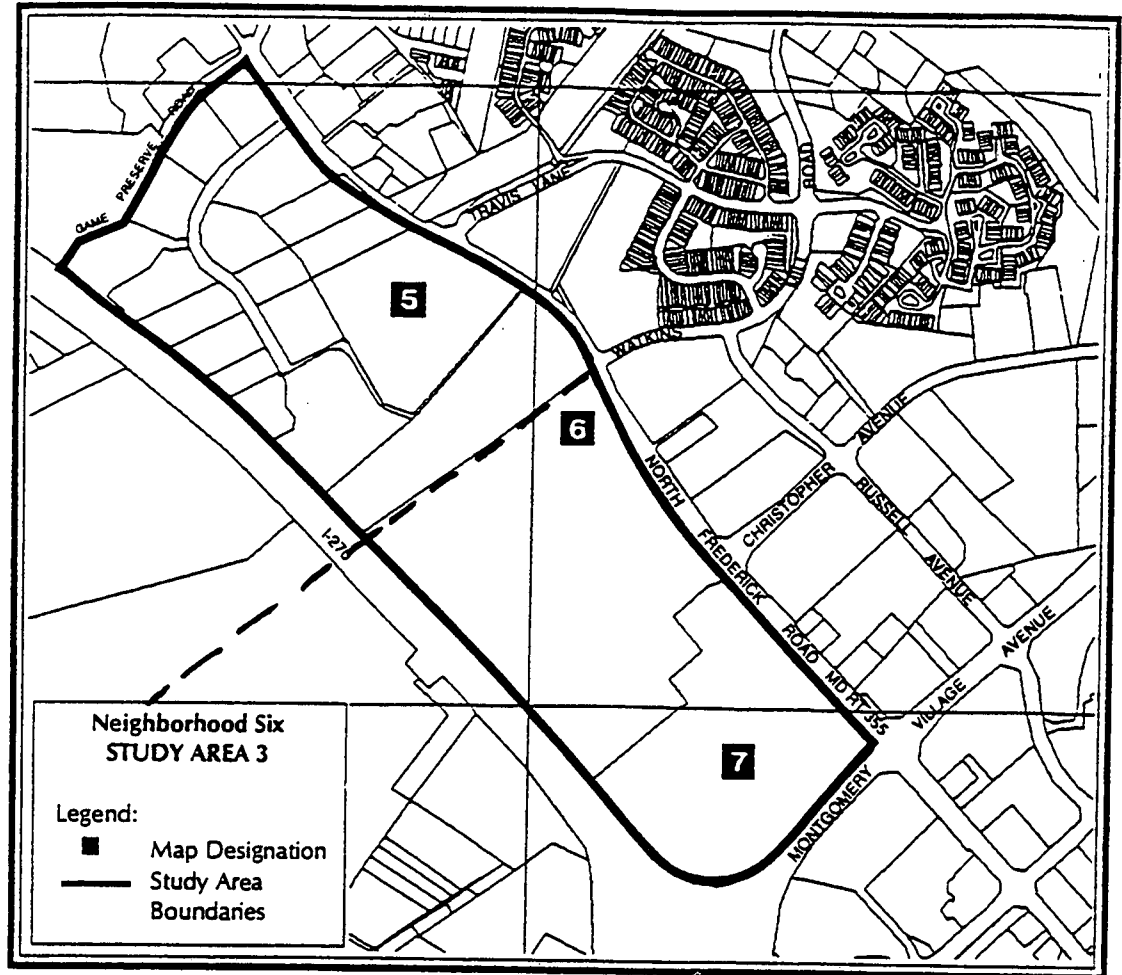
Res = Residential
Rsch = Research

* Map Designations without a Planning Commission recommendation in Study Areas 11 and 12 have been eliminated through the public hearing and work session process and are not part of the final adopted plan.

NOTE: Map Designations with Planning Commission recommendation but without adopted zoning are parcels outside the City limits.

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STUDY AREA 3



Neighborhood Six
STUDY AREA 3

Legend:

- Map Designation
- Study Area Boundaries

Total Area	104
Estimated Population	0
Housing Units	0
Predominant Land Use	Industrial-Research-Office
Vacant Land	108 acres

Study Area 3 is bounded on the north by Game Preserve Road which is the northern boundary of the City, on the east by Maryland Route 355 (North Frederick Road), on the south by Montgomery Village Avenue, and on the west by Interstate 270. Since the time of the 1986 master plan evaluation in this neighborhood, 121 acres of land owned by Lockheed Martin/I.B.M. has been annexed (1991) into the corporate limits and is now included in the subject study area.

The current land use in the neighborhood is dominated by industrial-research-office uses and has not changed significantly over the past ten years during which time not much significant development has taken place. North of the Lockheed Martin/I.B.M. holdings there are approximately 68 acres of vacant land, which represents 61 percent of all the vacant land available for development in this neighborhood.

Land use options, identified by map designation numbers on the Neighborhood Six Study Area 3 map on page 12, and listed in the accompanying chart beginning on page 16, are described as follows:

Land Use Options

- 5** Redesignate parcels within Crown Pointe as **commercial/industrial-research-office** (Map Designation 5), to allow for expansion of office and research and development uses under the most flexible zoning options available. This map designation is a good location for signature buildings situated on sites within Study Area 3 where high visibility from Interstate 270 will create an attractive visual image for the City of Gaithersburg. All buildings should be required to front on Maryland Route 355 with parking to be located behind the buildings in order to camouflage large concentrated parking areas. This designation will permit greater zoning flexibility, higher level of design control, and a wider range of uses, particularly along Maryland Route 355. Additional flexibility in terms of permissible uses would be tempered by the controls typically exercised within the tenets of the MXD zone to control the quality of development therein.

Land Use and Zoning Actions:

- Adopted **commercial/industrial-research-office** land use designation
- Parcel rezoned to **MXD**

- 6** Designate the 73-acres of I.B.M. and N417, owned by the Casey Trust, as **commercial/industrial-research-office** (Map Designation 6) which equates to the Mixed Use development (MXD) Zone. Development of this site for commercial retail facilities could possibly include a hotel: expansion of office and research and development uses would be permitted. The City is currently evaluating the feasibility of constructing a new interchange at Watkins Mill Road Extended over Interstate 270 to link Neighborhoods Five and Six and provide alternative transportation options to the interchange of North Frederick Avenue and Montgomery Village Avenue. The location of any development on the vacant 33-acre parcel on the northern portion of the I.B.M. property should take into consideration the placement of a new interchange. The main emphasis of the siting of new buildings will be towards Watkins Mill Road Extended. Watkins Mill Road Extended should be designed so that it is compatible with surrounding uses and the design of the interchange incorporating, where feasible, appropriate traffic calming measures more in keeping with the City's design standards emphasizing pedestrian access. Access to the vacant 33 acres will be from Watkins Mill Road Extended and an additional access point from North Frederick Avenue.

Land Use and Zoning Actions:

- Adopted **commercial/industrial-research-office** land use designation
- Zoning remains **I-3**

- 7** Redesignate the 47-acre parcel owned by Lockheed/Martin as **commercial/industrial-research-office** (Map Designation 7). This parcel was annexed into the City as part of the larger I.B.M. annexation in 1991. This map designation will affix a land use to the property and the parcel should be rezoned to MXD.

Land Use and Zoning Actions:

- Adopted **commercial/industrial-research-office** land use designation
- Parcel rezoned to **MXD**

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Study Area 3 would benefit from the adoption of design guidelines to control the visual appearance and location of buildings fronting on Maryland Route 355 and Watkins Mill Road Extended. Wherever possible, parking shall not be permitted to be located so as to front on Maryland Route 355 or Watkins Mill Road Extended. Inasmuch of the land fronting on Route 355 is vacant, tremendous visual impact can be attained through the adoption of such guidelines. Additionally, guidelines must attempt to control the appearance of buildings proximate to Interstate 270.

**PROJECTIONS FOR STUDY AREA 1
WITH CURRENT DEVELOPMENT**

Office Development

Crown Pointe	318,523 sq. ft.
Russell Office Park	115,000 sq. ft.
Montgomery Executive Center	122,522 sq. ft.
I.B.M.	422,051 sq. ft.
Lockheed/Martin	520,850 sq. ft.
TOTAL	1,498,946 sq. ft.

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LAND USE CLASSIFICATION HIERARCHY

Low Density Residential
Medium-Low Density Residential
Medium Density Residential
High Density Residential
Mixed Residential
Residential-Office
Commercial-Office-Residential
Mixed Use
Commercial
Commercial-Industrial-Research-Office
Industrial-Research-Office
Industrial
Institutional
Open Space

ZONING CATEGORIES

R-A	Low Density Residential (maximum density: 2 units per acre)
R-90	Medium Density Residential (maximum density: 3.5 units per acre)
R-6	Medium Density Residential (maximum density: 6 units per acre)
RP-T	Medium Density Residential (maximum density: 9 units per acre)
R-18	Medium Density Residential (maximum density: 18 units per acre)
R-20	Medium Density Residential (maximum density: 21.5 units per acre)
R-H	High Density Residential (maximum density: 54 units per acre)
R-O	Planned Residential
R-B	Residential Buffer
C-B	Commercial Buffer
C-1	Local Commercial
C-2	General Commercial
C-3	Highway Commercial
CBD	Central Business District
C-P	Commercial Office Park
E-1	Urban Employment
E-2	Moderate Intensity Industrial Park
I-1	Light Industrial
I-3	Industrial and Office Park
I-4	General Industrial

NEIGHBORHOOD SIX

LAND USE PLAN DESIGNATIONS AND COMPREHENSIVE REZONING 1997

MAP DESIG	STUDY AREA	SUBDIVISION/ PARCEL/LOT	ACRES	PROPERTY OWNERS	1996 ZONING	1983 LAND USE DESIGNATION	1996 DRAFT PLAN LAND USE DESIGNATION	PLANNING COMMISSION RECOMMENDATION	MAYOR & COUNCIL ADOPTION	ADOPTED ZONING
1	1	N903, N956	4.00	Sports Pavllion, Inc.	I-3	Ind-Rsch-Off	Comm (Opt A) Comm/Ind- Rsch- Off (Opt B)	Comm	Comm	C-2
2	2	Pt Parcel "A" (portion of N441)	1.03	Conrad V. Aschenbach	C-2	Ind-Rsch-Off	Ind-Rsch-Off (Opt A) Comm-Off (Opt B)	Ind-Rsch-Off	Comm-Off	C-2
3	2	N616	5.24	Price Enterprises, Inc.	C-2	Comm-Rsch-Off	Comm-Off	Comm-Off	Comm-Off	C-2
4	2	N727	1.90	Montgomery County Teachers Federal Credit Union	C-2	Comm	Comm	Comm	Comm	C-2
5	3	N102, N167 N260, N273 N329, N391 N526, N530 P1151, P206 P424, P443 Lot 1	58.00	Crown Pointe	I-3	Ind-Rsch-Off	Ind-Rsch-Off (Opt A) Comm/Ind- Rsch-Off (Opt B)	Comm/Ind-Rsch-Off	Comm/Ind-Rsch-Off	MXD
6	3	Northerly Portion of N860, N417	221.89	I.B.M. Casey Trust	I-3	Ind-Rsch-Off	Comm/Ind-Rsch-Off	Comm/Ind-Rsch-Off	Comm/Ind-Rsch-Off	I-3
7	3	-	47.00	Lockheed/Martin	I-3	Ind-Rsch-Off	Ind-Rsch-Off	Comm/Ind-Rsch-Off	Comm/Ind-Rsch-Off	MXD

Abbreviations:

Comm - Commercial
Den - Density

Ind - Industrial
Inst - Institutional

Med - Medium
Off - Office

Opt - Option
Rec - Recreational

Res - Residential
Rsch - Research



Maryland Department of Transportation
State Highway Administration

December 28, 1999

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

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Mr. Craig N. Capen, President
Board of Directors
Montgomery Village Foundation, Inc.
10120 Apple Ridge Road
P.O. Box 2130
Montgomery Village MD 20886-2130

Dear Mr. Capen:

Thank you for your interest in the project planning study at I-270 and Watkins Mill Road extended. Your comments in support of detailed study for alternate 6 and regional transit improvements are appreciated.

As you know, the purpose of this study is to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have placed a high priority on this project in order to support designated economic development areas.

Your concern that improvements would increase traffic on Watkins Mill Road in your neighborhood will be taken into account. Detailed travel demand studies are underway to evaluate how improvements would effect the traffic patterns throughout the local area. We appreciate your personal and neighborhood-wide concerns with regard to additional traffic near the schools and on local streets.

At this point, the study team has compiled the public and agency comments from the Alternates Public Workshop and is assessing the impacts and benefits of each alternate in order to determine which concepts to carry forward for the more detailed engineering, traffic and environmental studies. It is possible that alternates will be refined to avoid or minimize impacts to the surrounding communities. Those alternates carried forward will be evaluated and presented in a draft environmental document and displayed at a public hearing for formal comment, tentatively scheduled for fall 2000. The conclusion of this study is anticipated in fall 2001, with the recommendation of a selected alternate and receipt of Location and Design approvals.

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

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Mr. Craig N. Capen
Page Two

Thank you again for your interest and bringing to our attention your important community concerns. I hope that you and the Montgomery Village Foundation remain involved in this study and continue to offer comments as we progress. If you should have any questions or would like for us to meet with the foundation, please feel free to contact me at 410-545-8547 or 1-800-548-5026.

Very truly yours,

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

By: Michelle D. Hoffman
Michelle D. Hoffman
Project Manager
Project Planning Division



MONTGOMERY VILLAGE FOUNDATION, INC.

10120 APPLE RIDGE ROAD

P.O. BOX 2130

MONTGOMERY VILLAGE, MARYLAND 20886-2130

(301) 948-0110 FAX (301) 990-7071 www.mvf.org

December 14, 1999

Michelle D. Hoffman, Project Manager
State Highway Administration
Office of Planning and Preliminary Engineering
Mail Stop C-301
Box 717
Baltimore, MD 21203-0717

Dear Ms. Hoffman:

The Montgomery Village Foundation wishes to inform you that its Transportation Policy supports Alternative 6: Watkins Mill Road Extended Without I 270 Connection and asks that it be retained as one of the alternatives for detailed study. The Foundation supports the construction and extension of mass transit alternatives, such as the Corridor Cities Transitway, along the I 270 corridor from Shady Grove to Germantown and eventually out to Frederick.

The community's primary concern is safety and the adverse impact of additional traffic on what we consider to be our local street – Watkins Mill Road. As you may be aware, there are two elementary schools and one middle school along a short stretch of Watkins Mill Road in Montgomery Village.

The Foundation asks SHA to expand the study area to include the intersections along Watkins Mill Road up to Stedwick Road north (taking in the three schools) and along Montgomery Village Avenue (Rt. 124) to MidCounty Highway. Expanding the study area in this manner would provide the necessary information for both Montgomery Village and Gaithersburg residents to fairly assess the effect of a new interchange on traffic levels in the neighborhoods adjoining the proposed roadway modifications.

Thank you for the opportunity to comment. We look forward to the next phase of the project and an opportunity to review the results of a more detailed analysis.

Sincerely,


Craig N. Capen, President
Board of Directors

cc: Members of the Project Planning Team

RECEIVED

NOV 12 1999

NONTIDAL WETLANDS & WATERWAYS
WATER MANAGEMENT ADMIN., MDE



DEPARTMENT OF PUBLIC WORKS
AND TRANSPORTATION

RECEIVED

FEB 28 2000

THE WILSON T. HALLARD
BY

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Douglas M. Duncan
County Executive

Albert J. Genetti, Jr., P.E.
Director

November 4, 1999

can buy perhaps

Mr. David Walbeck
MDE Nontidal Wetlands and Waterways Division
2500 Broening Highway
Baltimore, Maryland 21224

may be able to get preservation credit for balance of impact

RE: Father Hurley Boulevard Wetland Mitigation
Tracing #9X-NT-1260/199261006

Dear Mr. Walbeck:

The purpose of this letter is to request a transfer of mitigation credit at the Hawkins mitigation site that was purchased by Montgomery County from the Maryland State Highway Administration (MSHA) for \$58,708.40. The one-acre credit was originally intended to satisfy the mitigation requirement for impacts associated with improvements to Watkins Mill Road.

The Watkins Mill Road project was never completed, and the County requests that 0.68 acres of this one-acre credit be applied to satisfy the mitigation requirement for Father Hurley Boulevard. The remaining 0.32 acres of credit would be reserved for future use on the Watkins Mill Road project, which is currently being designed by the MSHA.

As described in monitoring reports submitted to MDE by Coastal Resources, Inc., the Father Hurley mitigation site did not meet the minimum hydrology standards for wetland creation during the growing seasons of 1997 and 1998. Wetland impacts authorized for Father Hurley Boulevard include 15,470 sq. ft (0.36 acres) of forested nontidal wetlands, and 840 sq. ft. (0.02 acres) emergent nontidal wetlands. The mitigation requirement for these impacts is 0.76 acres using a replacement ratio of 2:1 for forested wetlands, and 1:1 for emergent wetlands.

The existing mitigation site for Father Hurley Boulevard provides 0.8 acres of riparian habitat at the confluence of two tributaries to Little Seneca Creek. The County intends to retain this area in a perpetual conservation easement, and requests that preservation credit be applied to

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the mitigation debt using a 10:1 ratio (i.e., credit of 0.08 acres). If preservation credit is acceptable to MDE, the outstanding mitigation debt for the project would be 0.68 acres as summarized below:

Planting and preservation of forested riparian habitat	- 0.08 acre credit
Wetland creation at the Hawkins mitigation site	- 0.68 acre credit
Total mitigation proposal	- 0.76 acre

A signature block for MDE approval is provided below for your convenience. If you need any additional information to approve this mitigation proposal for Father Hurley Boulevard, please to call Gary Johnson of my staff at 240-777-7265, or Gary Jellick at 410-956-9000.

Sincerely,


Edgar A. Gonzalez, Chief
Division of Engineering Services

EAG/ja

cc: Susan Jacobs (SHA-Environmental Programs Division)
Bill Branch (SHA- Environmental Programs Division)
Rick Adams (Rummel, Klepper & Kahl)
Gary Jellick (Coastal Resources, Inc.)

TRANSFER OF MITIGATION CREDIT APPROVED:

David Walbeck 11/24/99
David Walbeck Date
Maryland Dept. of the Environment

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**Maryland Department of Transportation
State Highway Administration**

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

October 5, 1999

Re: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. Nelson J. Castellanos
Division Administrator
Federal Highway Administration
711 West 40 Street
The Rotunda-Suite 220
Baltimore MD 21211

Attention: Ms. Pamela Stephenson

Dear Mr. Castellanos:

The State Highway Administration (SHA) is writing to request your concurrence with a determination of the non-applicability of Section 4(f) of the US DOT Act of 1966 (49 U.S.C. Section 303), regarding property located within the I-270/Watkins Mill Road Extended project area known as Brown Station or Metropolitan Grove Park.

SHA is currently conducting a Project Planning study at I-270 and Watkins Mill Road Extended to provide improved access to and from the transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas. An Alternates Public Workshop has been scheduled for November 23, 1999.

Recent correspondence (attached) with representatives of the City of Gaithersburg, the agency with jurisdiction over the property, indicates that while the property is designated for public use, it is not currently being used as parkland or for recreational purposes and is not intended or proposed to be used as parkland or for recreational purposes in the foreseeable future. Also attached is a Zoning and Master Plan map of the area.

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Mr. Nelson J. Castellanos
I-270 at Watkins Mill Road Extended
Page Two

In accordance with the Federal Highway Administration guidance on the applicability of Section 4(f), we request your concurrence on the signature line below, that the Brown Station or Metropolitan Park is not subject to the requirements of Section 4(f) of the US DOT Act of 1966.

Very truly yours,

Parker F. Williams
Administrator

by: Cynthia D. Simpson
Neil J. Pedersen, Director
Office of Planning and
Preliminary Engineering

Concurrence:

Pamela S. Stephenson
Federal Highway Administration
Division Administrator

April 26, 2000
Date

NJP:AE:lc

Attachments

cc: Ms. Anne Elrays
Ms. Michelle Hoffman
Mr. Joseph Kresslein
Ms. Gay Olsen
Ms. Melinda Peters
Ms. Cynthia Simpson
Ms. Pamela Stephenson

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EX-100-111-1

DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, CORPS OF ENGINEERS
POST OFFICE BOX 1715
BALTIMORE, MARYLAND 21203-1715

REPLY TO
ATTENTION OF:

SEP 0 8 1999

Operations Division

Subject: CENAB-OP-RMN (MD SHA/I-270 @ WATKINS MILL RD INTERCHANGE/
JD) 99-00838-12

CENAB-OP-RMN (MD SHA/I-270/US 15 SHADY GROVE METROSTATION
TO BIGGS FORD ROAD/CCT ALIGNMENT/JD)
95-00876-12

Mr. Joseph R. Kresslein, Assistant Division Chief
Maryland State Highway Administration
Project Planning Division
707 North Calvert Street
Baltimore, Maryland 21202

Dear Mr. Kresslein:

I am replying to your request for a jurisdictional determination (JD) and verification of the delineation of waters of the United States, including jurisdictional wetlands, for the proposed subject projects.

The JD was conducted on July 7th and 8th, 1999. During those dates, minor changes were made to the delineation. The meeting minutes pertaining to the JD dated July 9, 1999, accurately reflected those changes. Therefore, this office considers the delineations for the subject projects to be accurate and complete.

Those areas that were determined to be jurisdictional are regulated by this office pursuant to Section 404 of the Clean Water Act. This verification is valid for five years from the date of this letter, unless new information warrants a revision before the expiration date.

You are reminded that any grading or filling of waters of the United States, including jurisdictional wetlands, is subject to Department of the Army authorization. Other state and local authorizations may also be required. In addition, the Interstate Land Sales Full Disclosure Act may require that prospective buyers be made aware, by the seller, of the Federal authority over any waters of the United States, including jurisdictional wetlands, being purchased.

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If you have any questions concerning this matter, please call Mr. Steve Elinsky of this office at (410) 962-4503.

Sincerely,

Daniel L. Small

Daniel L. Small
Acting Chief, Maryland Section Northern



**Maryland Department of Transportation
State Highway Administration**

RECEIVED
SEP - 7 1999

September 2, 1999

Project No. MO839A11
I-270: Watkins Mill Road Extended
Montgomery County, Maryland

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

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

Dear Mr. Little:

On May 4 we conveyed the results of our historic sites reconnaissance. The purpose of this letter is to respond to your June 16 letter, notify you of a slightly expanded Area of Potential Effect (APE) for our project (I-270 at Watkins Mill Road Extended) and again seek your concurrence in our determination that the William Caulfield Farm (M20/38), the only historic structure within the APE for this project, would not meet the criteria for inclusion in the National Register of Historic Places.

Status—Expanded Area of Potential Effect

This project basically calls for interchange construction in close proximity to the Seneca Creek State Park in a highly developed area with intense commercial and residential development. We have expanded the preliminary area of potential effect (APE), as shown on Attachment 1, which is coterminous with the area of possible roadway improvements and extent of the viewsheds, where appropriate, from the roadway. It is likely, given the fact that the location of the Watkins Mill Road extended interchange would be confined to an area between the two spur roads, that the APE would be reduced at a later date.

Status—Architecture

In your June 16 letter you stated "Your letter does not explain why no other architectural investigation were conducted within SHA's APE" (See Attachment 2). We wish to inform you that the APE, located within an area heavily developed with commercial, housing and government structures in Gaithersburg, was carefully investigated. As shown on Attachment 3, the area that your reference as "Metropolitan Grove," based on a 1945 USGS Gaithersburg Quadrangle, has been totally obliterated—it is now the location of office parks, public facilities, such as MVA offices, the Metropolitan Police vehicle impoundment lots, Gaithersburg

hee: 2pm BC 9/20/99
Waiting SHA's action. ADP

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

HA - CAULFIELD FARM
NOT ELIGIBLE
10/6/99
JES

241

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Mr. J. Rodney Little
I-270: Watkins Mill Road Extended
Page 2

Maintenance Yard, plus privately owned impoundment facilities and junkyards, and very large garden apartment complexes, etc. Although we were not allowed to access the entirety of the huge, privately held junkyard/impoundment facility, we were informed that the only structure on site was the office trailer which was in view. Much of the area that was called Metropolitan Grove is the location of Brown's Station Park.

Methods and Results of Identification of Historic Properties

Both architectural and archeological resource databases were investigated for the proposed project. The expanded APE was investigated for architectural resources

Architecture

No additional historic properties were identified in the expanded areas of the APE.

Archeology

The undertaking will be reviewed again when plans and an engineering description are available in order to ascertain the need for archeological identification investigations.

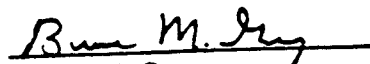
Review Request

We request your concurrence in our determination that the William Caulfield Farm (M20/38) would not meet the criteria for listing in the National Register by October 8. Should you have any questions or require clarification, please feel free to phone Ms. Rita M. Suffness on 410-545-8561 (or by E-Mail, RSuffness@sha.md.state.us) for historic standing structures or Ms. Mary F. Barse on 410-321-3232 (or by E-Mail, MBarse@sha.md.state.us) concerning archeology.

Very truly yours,

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

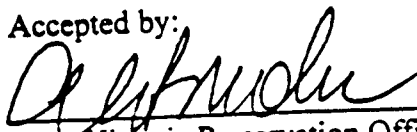
by:


Bruce M. Grey
Assistant Division Chief
Project Planning Division

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Mr. J. Rodney Little
I-270: Watkins Mill Road Extended
Page 3

Accepted by:


State Historic Preservation Office

10/6/99
Date

CDS:RMS

Attachments (3)

cc: Ms. Mary F. Barse (w/attachments)
Ms. Anne Elrays (w/attachments)
Mr. Bruce M. Grey
Dr. Charles Hall
Mr. Joseph Kresslein
Ms. Pam Stephenson



**Maryland
Department of
Housing and
Community
Development**

*Division of Historical and
Cultural Programs*

100 Community Place
Crownsville, Maryland 21032

410-514-7600

1-800-756-0119

Fax: 410-987-4071

Maryland Relay for the Deaf:

1-800-735-2258

<http://www.dhcd.state.md.us>

Parris N. Glendening
Governor

Raymond A. Skinner
Secretary

Marge Wolf
Deputy Secretary

June 16, 1999

Mr. Bruce M. Grey
Assistant Division Chief
Project Planning Division
Maryland Department of Transportation
State Highway Administration
P.O. Box 717
707 North Calvert Street
Baltimore, MD 21202

RE: Project No. MO839A11
I-270: Watkins Mill Road Extended, Montgomery County, Maryland
(Section 106 Review - FHWA)

Dear Mr. Grey:

Thank you for your letter of May 4, 1999, which the Maryland Historical Trust received on May 12, 1999, regarding the above-referenced project. The letter requested the Trust's concurrence that only one property in the area of potential effect retains sufficient significance to be considered for inclusion in the National Register of Historic Places. Trust staff have reviewed the package and below are our comments.

SHA's letter indicates that "the scope of the project is poorly defined and it is impossible to establish the area of potential effects based on the current documentation (Grey, May 4, 1999, page 2). Although this paragraph deals specifically with the archeological investigations for the project, it appears to be pertinent to the architectural investigations as well. The coordination package included a copy of the USGS Quadrangle for Gaithersburg, and an APE boundary is marked. The Caulfield Farm's property boundary extends into the APE and therefore was investigated. However, your letter does not explain why no other architectural investigations were conducted within SHA's defined APE. Based on a 1945 USGS Quadrangle for Gaithersburg (see Attachment 1), it appears that there are several buildings in the area identified as "Metropolitan Grove" which are at least fifty years of age. The Trust has no information regarding the nature of the buildings at Metropolitan Grove. However, since it is near the old B&O Railroad line, there is reason to believe the buildings are either railroad related structures or dwellings possibly related to a nearby Methodist Meeting Camp at Washington Grove. The Trust would appreciate receiving additional information regarding Metropolitan Grove before we concur that the Caulfield Farm is the only site which retains significance.



Mr. Bruce M. Grey
June 16, 1999
Page 2

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We will await the assessment of archeological potential until the plans for the project have been determined.

Thank you for providing us this opportunity to comment. Should you have any questions, please call Ms. Anne Bruder (for structures) at 410-514-7636 or me (for archeology) at 410-514-7631.

Sincerely,

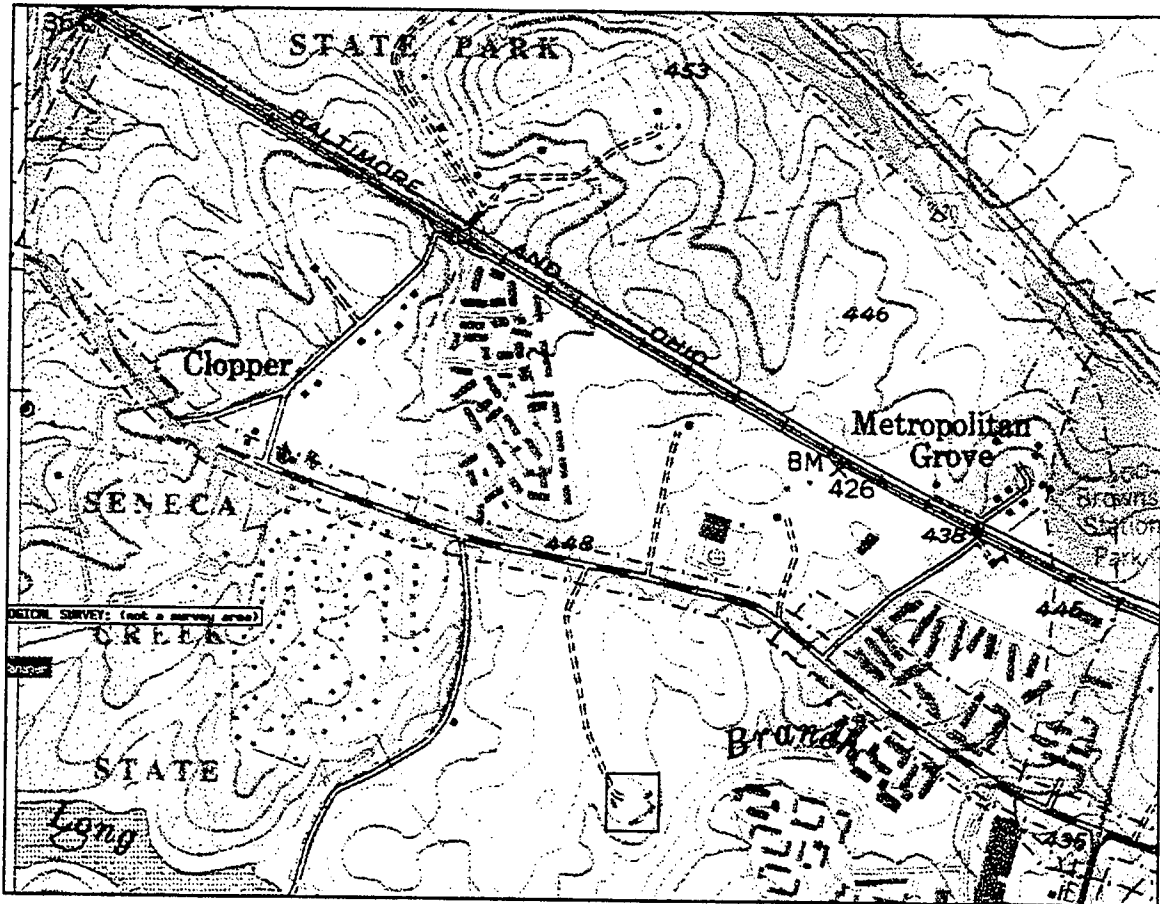


Elizabeth J. Cole
Administrator, Archeological Program

EJC:AEB:199901283
Attachment

cc: Dr. Charles Hall (SHA)
Ms. Rita Suffness (SHA)
Ms. Pam Stephenson (FHWA)

ATTACHMENT 1 246



USGS QUAD FOR GATTNEBURG
MNT GRAPHIC PREPARED JUNE 10, 1999



United States Department of the Interior

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



April 2, 1999

Mr. Parker F. Williams
Administrator
State Highway Administration
707 N. Calvert St.
Baltimore, MD 21203-0717

ATTN: Mr. Mark D. Duvall

RE: Project No. MO839A11; I-270 at
Watkins Mill Road Extended;
Montgomery County, MD

Dear Mr. Williams:

This responds to your March 18, 1999, request for information on the presence of species which are federally listed or proposed for listing as endangered or threatened within 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.*).

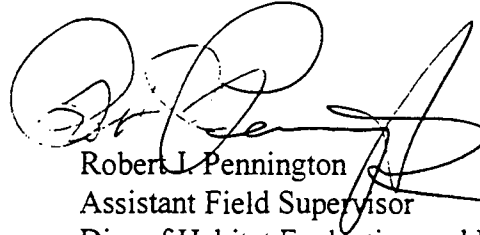
Except for occasional transient individuals, no federally proposed or listed endangered or threatened species are known to exist within the project impact area. Therefore, no biological assessment or further Section 7 consultation is required with the U.S. Fish and Wildlife Service. Should project plans 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) 260-8570.

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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 Andy Moser at (410) 573-4537.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Pennington", is written over the typed name and title.

Robert J. Pennington
Assistant Field Supervisor
Div. of Habitat Evaluation and Protection



249

Parris N. Glendening
Governor

Maryland Department of Natural Resources

ENVIRONMENTAL REVIEW

Tawes State Office Building
Annapolis, Maryland 21401
March 26, 1999

John R. Griffin
Secretary

Carolyn D. Davis
Deputy Secretary

Joseph R. Kresslein
Project Planning Division
Maryland Department of Transportation
State Highway Administration
P.O. Box 717
Baltimore, Maryland 21203-0717

Dear Mr. Kresslein:

This letter is in response to your letter of request, dated March 18, 1999, for information on the presence of finfish species in the vicinity of the Maryland Department of Transportation's Project No: MO839A11: I-270 @ Watkins Mill Road Extended in Montgomery County.

The subject project site is within the Great Seneca Creek (Washington Metropolitan Area) drainage area. Great Seneca Creek and all tributaries near your site are classified as Use I-P waters (Water Contact Recreation, Protection of Aquatic Life, and Public Water Supply). Generally, no instream work is permitted in Use I streams during the period of March 1 through June 15, inclusive, during any year.

Anadromous fish species are not present in Great Seneca Creek due to natural barriers located downstream on the Potomac River. However, downstream of your project site, adult trout are stocked during the spring season in the mainstem of Great Seneca Creek. The spring stocking season will be protected by the Use I instream work restriction period referenced above. Note that trout may also be stocked in the mainstem during the fall season, but no restriction period will be required in the fall. Thermal impacts are of concern in this watershed, despite the Use I classification, and should be addressed by your project plans. In addition to stocked trout in Great Seneca Creek mainstem, it is expected that the perennial reaches of streams in this area support resident populations of several fish species typically found in the region. Table A2-4 (attached) lists fish species documented by our Maryland Biological Stream Survey project in the Potomac Washington Metro Basin. Many of these species could potentially be found near your project site. These species should be adequately protected by the Use I instream work prohibition period, sediment and erosion control methods, and other Best Management Practices typically used for protection of stream resources.

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

Sincerely,

A handwritten signature in dark ink that reads "Ray C. Dintaman, Jr.".

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

RCD
Attachment

Telephone: _____
DNR TTY for the Deaf: (410) 974-3683

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Table A2-4. Fish species found in 1994 MBSS project sampling vs supplemental sampling, Potomac Washington Metro Basin

Fish Species	MBSS Study	Supplemental Sampling
AMERICAN EEL	X	X
BANDED KILLIFISH	X	X
BLACK CRAPPIE		X
BLACKNOSE DACE	X	X
BLUEGILL	X	X
BLUESPOTTED SUNFISH		X
BLUNTNOSE MINNOW	X	X
BROWN BULLHEAD	X	X
BROWN TROUT		X
CENTRAL STONEROLLER	X	X
CHAIN PICKEREL	X	X
CHANNEL CATFISH		X
COMMON CARP		X
COMMON SHINER	X	X
CREEK CHUB	X	X
CREEK CHUBSUCKER	X	X
CUTLIPS MINNOW	X	X
EASTERN MUDMINNOW	X	X
EASTERN SILVERY MINNOW	X	X
FALLFISH	X	X
FANTAIL DARTER	X	X
FATHEAD MINNOW	X	X
GIZZARD SHAD	X	X
GOLDEN REDHORSE	X	
GOLDEN SHINER	X	
GOLDFISH	X	X
GREEN SUNFISH	X	X
GREENSIDE DARTER	X	X
LAMPREY	X	X
LARGEMOUTH BASS	X	X
LEPOMIS HYBRID	X	X
LONGEAR SUNFISH		X
LONGNOSE DACE	X	X
MOSQUITOFISH	X	X
MOTTLED SCULPIN	X	X
NORTHERN HOGSUCKER	X	X
NOTROPIS SP.		X
POTOMAC SCULPIN	X	X
PUMPKINSEED	X	X



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APR 29 9 53 AM '96

Parris N. Glendening
Governor

Maryland Department of Natural Resources
Public Lands and Forestry
Tawes State Office Building
580 Taylor Avenue
Annapolis, Maryland 21401

John R. Griffin
Secretary
Ronald N. Young
Deputy Secretary

April 24, 1996

Mr. Joseph Kresslein
Project Planning Division
State Highway Administration
P.O. Box 717
Baltimore, MD 21203

Re: Improvements to I-270 in Vicinity of Seneca Creek State Park and Urbana Lake Fish Management Area (96-GRP-30, 96-GRP-31).

Dear Mr. Kresslein:

The following information concerning Seneca Creek State Park and the Urbana Lake Fish Management area are being provided in response to your March 29, 1996 letter informing us of your study of possible improvements to I-270 in Frederick and Montgomery counties, Maryland. I look forward to working with you to ensure that necessary improvements to this roadway do not adversely impact these public recreation areas.

Seneca Creek State Park- The Department of Natural Resources considers Seneca Creek SP to be a public recreational resource of major regional significance. At the present time, facilities at Seneca Creek provide a wide diversity of day use opportunities, including hiking and nature study, bicycling and mountain biking, equestrian use, boating and fishing, picnicking, playgrounds, disc golf, baseball and multi-use athletic fields. In 1995, 369,808 persons visited this park. Although a formal Master Plan has not been approved, current plans call for development of a hiker biker trail that will pass beneath I-270 along Seneca Creek to connect the state park with the Maryland-National Capital Park and Planning Commission property upstream. Additional future recreational development in the I-270 vicinity can not be ruled-out at this time. For instance, it is possible that future demand will result in consideration of day use recreation on parkland north-west of I-270, adjacent to the Middlebrook Hill and Fox Chapel North Subdivisions. In addition to these recreational uses, Seneca Creek State Park is rich in cultural resources having historic significance, and valuable natural resources (wetlands, floodplains, contiguous forest, high quality aquatic habitat, etc.). Management activities at Seneca Creek SP make protection for these resources a high priority.

Telephone: _____

DNR TTY for the Deaf: 301-974-3683

VI A-71

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Kresslein, Joseph
April 24, 1996
Page 2

Two parcels adjacent to I-270 (159 and 166, shown on attached map) were acquired with money from the Land and Water Conservation Fund. The other parcels were acquired with funds from Program Open Space.

Urbana Lake Fish Management Area- Urbana Lake is a managed fishing area with a lake and public parking area. A portion of the site is also leased to Maryland Public Television, which maintains a broadcasting tower and equipment building on the site. Urbana Lake provides year around warmwater gamefishing, and spring trout fishing. The Department of Natural Resources stocks trout each year and introduces bass when our surveys indicate that the predator-forage fish ratio is becoming unbalanced. Although visitor numbers are not recorded, this facility receives constant use that may be quite heavy at times (following trout stocking dates, for instance). We consider this public fishing area to be a unique local recreational resource of considerable significance to area residents.

Urbana Lake was purchased by the Department of Natural Resources from the State Roads Commission in July of 1961. At this time, we have not identified the source of the funds used for that acquisition. However, Sport Fish Restoration money from the U.S. Department of the Interior is regularly used for management and maintenance activities at Urbana Lake.

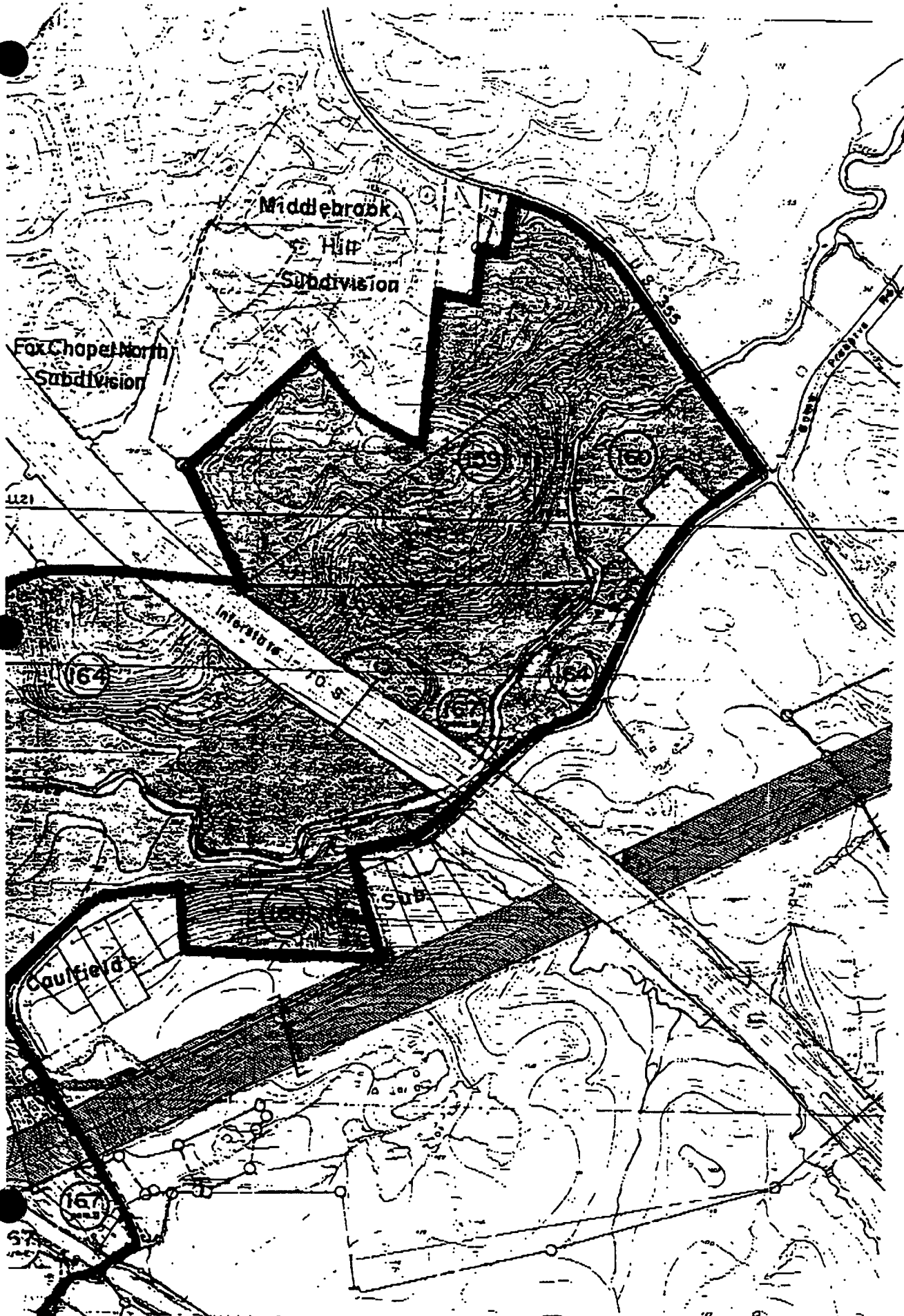
Should you have any additional questions please feel free to call me or Arnold Norden at (410) 974-3654.

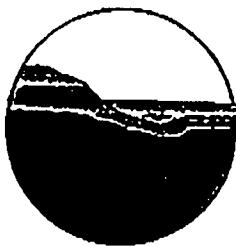
Sincerely,



Gene F. Cheers
Chief, Project Review

cc: Neal Welch
Robert Lunsford





PROJECT
Maryland Department of Natural Resources

Capital Programs Administration
2012 Industrial Drive
Annapolis, Maryland 21401

MAR 25 10 51 AM '90

William Donald Schaefer
Governor

Torrey C. Brown, M.D.
Secretary

Michael J. Nelson
Assistant Secretary
for Capital Programs

March 22, 1990

Cynthia D. Simpson
Assistant Division Chief
Project Planning Division
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21203-0717

Re: Contract No. F 192-101-772 I-270: Md.
124 to I-70 to north of Biggs Ford Road
in Frederick and Montgomery Counties.

Dear Ms. Simpson:

This is in response to your letter of February 1, 1990 requesting current information on Seneca Creek State Park for the above referenced I-270 project.

Seneca Creek State Park is operated and maintained by the Maryland Forest, Park and Wildlife Service. All planning, acquisition and development activities are administered by the Capital Programs Administration.

The current acreage (as of January 20, 1990) is 6102 acres, including a 90 acre lake. The fund source for acquiring land was both Program Open Space and Land and Water Conservation Funds (LWCF). Federal LWCF was also used for development of facilities.

The existing facilities at Seneca Creek State Park include: the 90 acre recreation lake; boating and canoeing facilities; picnic areas, including shelters; childrens play areas including play equipment; multi-purpose play fields; hiking trails; horse trails; and Visitors Center/Park Headquarters.

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Page 2
Cynthia D. Simpson
March 22, 1990

Plans for the development of the section of the park between Cloppers Road and Md. Rte. 355 are not complete. However, it is anticipated that development and use of this section in the future will include a hiker/biker/horse trail system extending from the Potomac River, through Seneca Creek State Park to lands owned by Monthomery County north of Md. Rte. 355; picnic areas; nature interpretation; and canoeing.

The 1989 attendance information for Seneca Creek State Park is provided on the attached sheet.

If you have any questions or need additional information, please contact me.

Sincerely



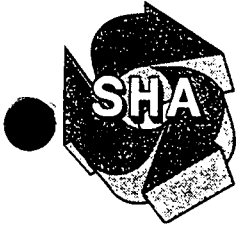
Gene F. Cheers
Chief, Capital Improvements
Planning & Environmental Review

GFC:sab

cc: George Forlifer

enclosure

B. ELECTED OFFICIALS



**Maryland Department of Transportation
State Highway Administration**

257
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

July 2, 2001

The Honorable Blair G. Ewing, President
Montgomery County Council
100 Maryland Avenue
Rockville MD 20850

Dear Council President Ewing: *Blair*

Thank you for your recent letter regarding the project planning study at I-270 and Watkins Mill Road Extended, and for the Montgomery County Council's prompt consideration and support of Alternate 3 Revised. I also appreciate your comments about traffic calming on Watkins Mill Road and the County's commitment to address this important issue. The following is some information on the remaining steps in our process.

Alternate 3 Revised was presented to the agencies at the Interagency Review Meeting on June 20, as the State Highway Administration's (SHA) draft selected alternate. Agency concurrence on this alternate is expected soon. The SHA will then prepare a final environmental document for approval by the Federal Highway Administration in Fall/Winter 2001. This document will contain information that summarizes the engineering and environmental analyses conducted on the selected alternate, as well as public and agency comments and correspondence.

The I-270/Watkins Mill Road Extended project is funded for project planning only. Following Location and Design approvals, the project will become eligible to proceed into the design stage when funding becomes available. Design usually takes 2-3 years for a project of this magnitude. Following the design stage, if funding is identified, right-of-way acquisition and construction could take place.

Thank you again for your letter. If you have any questions or comments, please do not hesitate to contact Mr. Neil J. Pedersen, Deputy Administrator for Planning and Engineering, at 410-545-0411 or, by email, at npedersen@sha.state.md.us.

Sincerely,

Parker F. Williams
Administrator

cc: The Honorable Kumar Barve, Chair, Montgomery County House Delegation
The Honorable Douglas M. Duncan, Montgomery County Executive
Mr. Neil J. Pedersen, Deputy Administrator for Planning and Engineering, State Highway Administration
The Honorable Ida Ruben, Chair, Montgomery County Senate Delegation

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

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

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The Honorable Blair G. Ewing
Page Two

bcc: Mr. Arthur Holmes, Acting Chair, Montgomery County Planning Board
Mr. Mark Lotz, Project Manager, The Wilson T. Ballard Company (with incoming)
Mr. Jeremy Beck, Project Engineer, State Highway Administration (with incoming)
Ms. Linda Strack, Administrative Assistant, State Highway Administration #01jun54



MONTGOMERY COUNTY COUNCIL
ROCKVILLE, MARYLAND

OFFICE OF THE COUNCIL PRESIDENT

June 21, 2001

Mr. Parker F. Williams, Administrator
Maryland State Highway Administration
Post Office Box 717
Baltimore, Maryland 21203-0717

Dear Mr. Williams:

On June 19 the County Council reviewed the plans for the proposed interchange of I-270 and Watkins Mill Road Extended and we prefer Alternative 3 Revised among the alternates studied. The interchange will result in significant congestion relief to nearby intersections and will provide direct access from to I-270 to the Metropolitan Grove MARC station and the future Corridor Cities Transitway station at that location.

The Council is committed to the development and implementation of a traffic mitigation plan to calm traffic and improve pedestrian safety along the residential portion of Watkins Mill Road in Montgomery Village, with special attention to the safety of school children attending the four schools along this road. We intend for the County to develop such a mitigation plan and to begin to implement it before the interchange goes under construction.

We appreciate the assistance of your staff and consultants during our review of this project, especially Dennis Atkins and Mark Lotz.

Sincerely,

A handwritten signature in cursive script, reading "Blair G. Ewing".

Blair G. Ewing, President
County Council

BE/go

Copies: The Honorable Kumar Barve, Chair, Montgomery County House Delegation
The Honorable Ida Ruben, Chair, Montgomery County Senate Delegation
The Honorable Douglas M. Duncan, County Executive
Mr. Arthur Holmes, Acting Chair, Montgomery County Planning Board



Maryland Department of Transportation
State Highway Administration

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

260

June 16, 2000

Mr. David Hondowicz
Policy Analyst
Office of Councilmember Phil Andrews
Montgomery County Council
100 Maryland Avenue
Rockville MD 20850

Dear Mr. Hondowicz:

Thank you for your continued interest in the planning study at I-270 and Watkins Mill Road Extended. You raise a very good question about which alternates are still under consideration. I apologize for any confusion and hope that this letter helps to clarify your concern.

Since the November, 1999 Alternates Public Workshop, we have reviewed agency and public comments and sought concurrence from the environmental regulatory agencies on four alternates to carry forward into the detailed planning stage for traffic, engineering and environmental studies, including the following:

- No Build (Alternate 1) – Consists of routine maintenance only.
- Baseline (Alternate 6) – Watkins Mill Road would be extended, but without interstate access for the general use traffic. (Options A, B, C)
- Alternate 2 – Watkins Mill Road would be extended and would have a partial cloverleaf interchange at I-270 with full interstate access. (Options A, B, C)
- Alternate 3 – Watkins would be extended and would have a full diamond interchange at I-270 with full interstate access. This alternate does not include the HOV direct access ramp. (Options B, C)

It was further requested by the Federal Highway Administration that Alternate 4 be retained for detailed study. Alternate 4 includes the extension of Watkins Mill Road with a partial diamond interchange at I-270 with access only to and from the north, including options A, B and C. The reason for retaining Alternate 4, even though the partial access may not fully address the purpose and need for this study, is because at the time, it was the only alternate, besides the No-Build Alternate and the Baseline Alternate, that did not impact the Great Seneca Park, a resource protected by Section 4(f).

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

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Mr. David Hondowicz
Page Two

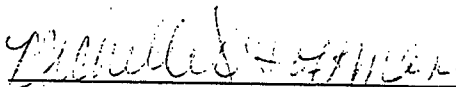
Alternates 2-I, 3-I and 5 were not retained for detailed study. Please note; however, that the US Army Corps of Engineers and the US Fish and Wildlife Service felt that any impacts to the stream along the west side of I-270 (a tributary to the Great Seneca Creek) should be avoided or minimized by any transportation improvements. Therefore, as part of Alternate 2, both Alternate 2-I (the eastern shift of mainline I-270 with the same interchange configuration) and Alternate 5 (a full diamond with the southbound Collector-Distributor, or local, lanes on the west side of the Wetland/Stream area) should be further evaluated as options to Alternate 2. Therefore, while not being carried forward as alternates on their own, Alternates 2-I and 5 will be further evaluated for comparison purposes to avoid or minimize any impacts to the tributary of Great Seneca Creek on the west side of I-270. This does mean, that as options to Alternate 2, these design concepts could be pursued.

Thank you again and I look forward to your continued involvement in the planning study at I-270 and Watkins Mill Road Extended. Please feel free to call me at 410-545-8547 or 1-800-548-5026.

Very truly yours,

Cynthia D. Simpson
Deputy Director
Office of Planning and Engineering

By:


Michelle D. Hoffman
Project Manager
Project Planning Division

cc: Ms. Jean Chait, Transportation Planner, Montgomery County Department of Public Works and Transportation,
Mr. Clark Wagner, Urban Design Director, City of Gaithersburg
Ms. Anne Elrays, Environmental Manager, State Highway Administration



Maryland Department of Transportation
State Highway Administration

262
Parris N. Glendening
Governor
John D. Porcari
Secretary
Parker F. Williams
Administrator

April 12, 2000

The Honorable Douglas M. Duncan
Montgomery County Executive
2nd Floor
101 Monroe Street
Rockville MD 20850

Dear County Executive Duncan:

Thank you for your recent letter responding to our inquiries on project planning studies at I-270 and Watkins Mill Road extended, particularly regarding Alternate 4. This letter provides some background information on Alternate 4.

Alternate 4, the partial diamond interchange that only provides access to and from the north along I-270, was initially proposed to be dropped from further consideration. This was as a result of concerns with traffic and the alternate's ability to satisfy the purpose and need of this study, which is to provide improved access to and from the transportation network to serve planned economic development in the designated growth areas of northern Gaithersburg. We have similar concerns over whether Alternate 6 could adequately address the purpose and need of this planning study.

Based on the preliminary environmental analysis, however, it appears that Alternate 4 is the only "build" alternate, other than Alternate 6, that avoids Section 4(f) impacts to the publicly owned Great Seneca Park. As per section 4(f) requirements, it is necessary that any impact to a 4(f) resource, such as the Great Seneca Park, be mitigated through avoidance, minimization, or compensation, with avoidance as the primary objective. Based on this fact, the Federal Highway Administration required that Alternate 4 be retained for detailed study. We anticipate that, as required, a thorough analysis of Section 4(f) avoidance, minimization, and mitigation measures will be undertaken during detailed studies of Alternates 2 and 3. Impacts to the Great Seneca Park may be avoided with these full interchange alternates, which may more adequately address the purpose and need of this study.

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

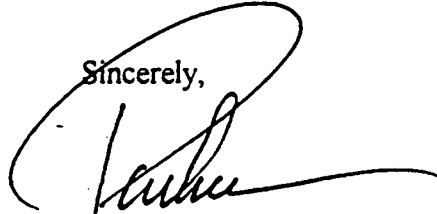
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The Honorable Douglas M. Duncan
Page Two

Thank you again for your letter. If you have any questions, please feel free to call me or Mr. Neil Pedersen, our Director of Planning and Preliminary Engineering, who may be reached at 410-545-0411 or 1-888-204-4828.

Sincerely,



Parker F. Williams
Administrator

cc: Ms. Pamela Stephenson, Environmental Analyst, Federal Highway Administration
Mr. Neil J. Pedersen, Director of Planning and Preliminary Engineering, State Highway Administration



Maryland Department of Transportation
State Highway Administration

264
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

March 10, 2000

The Honorable Douglas M. Duncan
Montgomery County Executive
101 Monroe Street
2nd Floor
Rockville MD 20850

Dear County Executive Duncan:

The State Highway Administration (SHA) has completed initial project planning studies at I-270 and Watkins Mill Road Extended, Project Number MO839B11, to provide improved access to and from the transportation network to serve planned economic development in the designated growth areas of northern Gaithersburg. Several build alternates were analyzed, each of which included the extension of Watkins Mill Road between MD 355 and MD 117 as either four or six lanes. With the exception of Alternate 6, all of the preliminary build alternates included a partial or full interchange connecting I-270 and Watkins Mill Road Extended. The preliminary alternates consisted of the following:

- Alternate 1 (No Build)
- Alternate 2 (Partial Cloverleaf Interchange)
- Alternate 2-I (Partial Cloverleaf Interchange with Eastern Shift of I-270)
- Alternate 3 (Full Diamond Interchange)
- Alternate 3-I (3/4 Diamond Interchange)
- Alternate 4 (1/2 Diamond Interchange)
- Alternate 5 (Full Diamond Interchange with Western Collector-Distributor Lane Shift)
- Alternate 6 (Watkins Mill Road Extended between MD 355 and MD 117 with no general-purpose or mixed-flow interstate access)

Early in the planning stages, we developed concepts and prepared an environmental inventory of the area to identify social, economic, natural and cultural resources. We considered these resources in the development of alternates. On November 23, 1999, an Alternates Public Workshop was held at the Activity Center at Bohrer Park in Gaithersburg, where we presented the findings of the initial project planning evaluations to interested citizens and business representatives. A copy of the brochure distributed at the workshop is enclosed for your reference.

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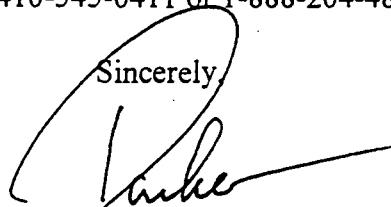
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Subsequent to the Alternates Public Workshop, the public and agency comments were evaluated and several alternates were selected for the more detailed traffic, engineering, and environmental evaluations. These alternates include:

- Alternate 1 (No Build)
- Alternate 2 (Partial Cloverleaf Interchange)
- Alternate 3 (Full Diamond Interchange)
- Alternate 4 (1/2 Diamond Interchange)
- Alternate 6 (Watkins Mill Road Extended between MD 355 and MD 117 with no general-purpose or mixed-flow interstate access)

In accordance with Transportation Article 8-612 of the Maryland Code Annotated (1993 Repl. Vol.), we request the Montgomery County Council's concurrence to proceed with final project planning studies for I-270 at Watkins Mill Road Extended. If you have any questions, please feel free to call me or Mr. Neil Pedersen, our Director of Planning and Preliminary Engineering, who may be reached at 410-545-0411 or 1-888-204-4828.

Sincerely,



Parker F. Williams
Administrator

Enclosure

cc: Mr. Neil J. Pedersen, Director of Planning and Preliminary Engineering, Maryland State Highway Administration

266

The Honorable Douglas M. Duncan
Page Three

bcc: The Honorable Sidney A. Katz, Mayor, City of Gaithersburg
Ms. Jean Chait, Montgomery County Department of Public Works and Transportation
Mr. John Clark, Montgomery County Department of Public Works and Transportation
Mr. Albert Gennetti, Director, Montgomery County Department of Public Works and Transportation
Mr. David B. Humpton, City of Gaithersburg
Dr. Glenn Orlin, deputy Staff Director, Montgomery County Council
Mr. Eric Soter, City of Gaithersburg
Mr. Clark Wagner, City of Gaithersburg
Ms. Anne Elrays, Environmental Analyst, State Highway Administration
Mr. Bruce M. Grey, Deputy Division Chief, State Highway Administration
Ms. Michelle D. Hoffman, Project Manager, State Highway Administration
Mr. Joseph Kresslein, Assistant Division Chief, State Highway Administration
Mr. Douglas Simmons, Division Chief, State Highway Administration
Ms. Cynthia D. Simpson, Deputy Director, State Highway Administration
Mr. Dennis Simpson, Assistant Division Chief, State Highway Administration
Mr. Glen Smith, Regional Planner, State Highway Administration
Mr. James Wynn, Assistant Division Chief, State Highway Administration



**Maryland Department of Transportation
State Highway Administration**

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

267

March 10, 2000

The Honorable Kumar P. Barve
Chairman, Montgomery County Delegation
Maryland House of Delegates
222 Lowe House Office Building
6 Governor Bladen Boulevard
Annapolis MD 21401-1991

Dear Delegate Barve:

The State Highway Administration (SHA) has completed initial project planning studies at I-270 and Watkins Mill Road Extended, Project Number MO839B11, to provide improved access to and from the transportation network to serve planned economic development in the designated growth areas of northern Gaithersburg. Several build alternates were analyzed, each of which included the extension of Watkins Mill Road between MD 355 and MD 117 as either four or six lanes. With the exception of Alternate 6, all of the preliminary build alternates included a partial or full interchange connecting I-270 and Watkins Mill Road Extended. The preliminary alternates consisted of the following:

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The Honorable Kumar P. Barve
Page Two

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In accordance with Transportation Article 8-612 of the Maryland Code Annotated (1993 Repl. Vol.), we request the Montgomery County Council's concurrence to proceed with final project planning studies for I-270 at Watkins Mill Road Extended. If you have any questions, please feel free to call me or Mr. Neil Pedersen, our Director of Planning and Preliminary Engineering, who may be reached at 410-545-0411 or 1-888-204-4828.

Sincerely,



Parker F. Williams
Administrator

Enclosure

cc: Mr. Neil J. Pedersen, Director of Planning and Preliminary Engineering, Maryland State
Highway Administration



Maryland Department of Transportation
State Highway Administration

269
Parris N. Glendening
Governor
John D. Porcari
Secretary
Parker F. Williams
Administrator

March 10, 2000

The Honorable Ida G. Ruben
Chairperson, Montgomery County Senate Delegation
Senate of Maryland
100 James Senate Office Building
110 College Avenue
Annapolis MD 21401-1991

Dear Senator Ruben:

The State Highway Administration (SHA) has completed initial project planning studies at I-270 and Watkins Mill Road Extended, Project Number MO839B11, to provide improved access to and from the transportation network to serve planned economic development in the designated growth areas of northern Gaithersburg. Several build alternates were analyzed, each of which included the extension of Watkins Mill Road between MD 355 and MD 117 as either four or six lanes. With the exception of Alternate 6, all of the preliminary build alternates included a partial or full interchange connecting I-270 and Watkins Mill Road Extended. The preliminary alternates consisted of the following:

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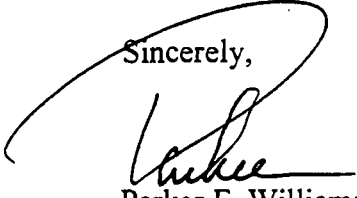
The Honorable Ida G. Ruben
Page Two

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In accordance with Transportation Article 8-612 of the Maryland Code Annotated (1993 Repl. Vol.), we request the Montgomery County Council's concurrence to proceed with final project planning studies for I-270 at Watkins Mill Road Extended. If you have any questions, please feel free to call me or Mr. Neil Pedersen, our Director of Planning and Preliminary Engineering, who may be reached at 410-545-0411 or 1-888-204-4828.

Sincerely,



Parker F. Williams
Administrator

Enclosure

cc: Mr. Neil J. Pedersen, Director of Planning and Preliminary Engineering, Maryland State Highway Administration



**Maryland Department of Transportation
State Highway Administration**

271
Parris N. Glendening
Governor
John D. Porcari
Secretary
Parker F. Williams
Administrator

March 10, 2000

The Honorable Michael L. Subin
Chairman, Montgomery County Council
100 Maryland Avenue
Rockville MD 20850

Dear Chairman Subin:

The State Highway Administration (SHA) has completed initial project planning studies at I-270 and Watkins Mill Road Extended, Project Number MO839B11, to provide improved access to and from the transportation network to serve planned economic development in the designated growth areas of northern Gaithersburg. Several build alternates were analyzed, each of which included the extension of Watkins Mill Road between MD 355 and MD 117 as either four or six lanes. With the exception of Alternate 6, all of the preliminary build alternates included a partial or full interchange connecting I-270 and Watkins Mill Road Extended. The preliminary alternates consisted of the following:

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272

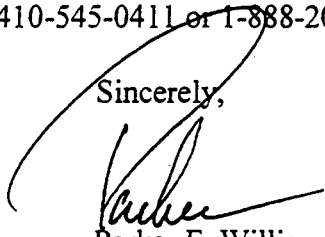
The Honorable Michael L. Subin
Page Two

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Sincerely,

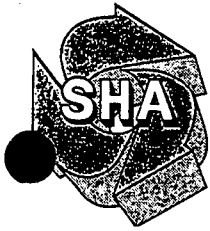


Parker F. Williams
Administrator

Enclosure

cc: Mr. Neil J. Pedersen, Director of Planning and Preliminary Engineering, Maryland State Highway Administration

C. CITIZENS COMMENTS RECEIVED SUBSEQUENT TO PUBLIC HEARING



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

274

June 28, 2001

Ms. Linda J. Gore
60 Oak Shade Road
Gaithersburg MD 20878
Email: lindagore@juno.com

Dear Ms. Gore:

Thank you for your recent e-mail requesting information regarding the approval process for the I-270/Watkins Mill Road Extended project planning study.

Alternate 3 Revised has been identified as the State Highway Administration (SHA) Draft Selected Alternate. Alternate 3 Revised was presented as such on June 20, 2001 to the group of environmental resource agencies concerned with the project. Agency concurrence on this alternate is expected soon, after which Alternate 3 Revised will become the SHA Selected Alternate. The SHA will then prepare a final environmental document based on the SHA Selected Alternate and request approval of the document and Location Approval from the Federal Highway Administration in Fall/Winter 2001. Design Approval from the SHA Administrator is anticipated following Location Approval.

The I-270/Watkins Mill Road Extended project is currently funded for project planning only. Following Location and Design approvals, the project will become eligible to proceed into the design stage when funding becomes available. The design process usually takes 2-3 years for a project of this magnitude. Following the design stage, again if funding is identified, right-of-way acquisition and construction could take place.

The SHA works very closely with local elected officials in determining what projects will be advanced in the Consolidated Transportation Program (CTP). Each Fall, the Secretary of Transportation visits every county to present the CTP. The counties prepare a priority list of projects they want advanced in the CTP. The Montgomery County projects must compete for funding with the other 22 Maryland counties.

My telephone number is _____

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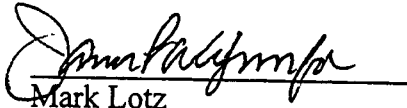
275

Ms. Linda J. Gore
Page Two

Thank you again for your interest in this study. If you have any additional questions, please feel free to contact Mark Lotz, the project manager, by telephone at 410-545-8547 or toll-free at 1-800-548-5026, or by email at mlotz@wtbco.com.

Very truly yours,

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

By: 
Mark Lotz
Project Manager for
Project Planning Division

cc: File (with incoming)
Ms. Anne Elrays, Environmental Manager, State Highway Administration
Mr. Mark Lotz, Project Manager, The Wilson T. Ballard Co. (with incoming)
Mr. James Wynn, Assistant Division Chief, State Highway Administration

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From: Linda J Gore <lindagore@juno.com>
To: <jbeck@sha.state.md.us>
Date: 6/17/01 3:57PM
Subject: Re: I-270/Watkins Mill Road Extended Interchange

Dear Mr. Beck,

I would appreciate a quick update on where the I-270/Watkins Mill Road Extended Interchange is now in the approval process. Once it is approved, when would the process to acquire funding begin?

Thank you in advance for your help.

Linda Gore

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**Maryland Department of Transportation
State Highway Administration**

April 18, 2001

277
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

Mr. Kevin D. Mack, RLA
Vice President
Watkins Mill Home Owner's Association
P.O. Box 8205
Gaithersburg MD 20898-8205

Dear Mr. Mack:

Thank you for your recent letter regarding the project planning study at I-270 and Watkins Mill Road Extended. Your comments about your support for a full-movement interchange are appreciated.

As you may already know, the purpose of this study is to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support designated economic development areas.

Traffic issues are a critical concern with the I-270 at Watkins Mill Road Extended study. Traffic volumes are expected to increase over the next 20 years regardless of the outcome of this project, based on the projected growth and planned development within northern Gaithersburg. This project aims to provide a transportation solution that works within the existing environment to provide better accessibility, congestion relief and a safer transportation network. The proposed build alternates improve traffic in the project area by reducing travel distances and travel times for I-270 traffic going to and from existing and proposed development areas, as well as reducing the number of signalized intersections through which I-270 traffic must travel to reach areas adjacent to the interstate.

We appreciate your comments regarding the other needed transportation improvements in the area. The I-270/US 15 Multi-Modal Corridor Study is entering the Detailed Studies stage of project planning for various improvement alternatives, including the Corridor Cities Transitway and the upgrading of the I-270/MD 117 and I-270/Middlebrook Road interchanges. The State Highway Administration (SHA) also recognizes that the Congestion Relief Study improvement to the MD 124/MD 355 intersection, soon to be constructed, is only an interim solution. The SHA is committed to working with local area officials to prioritize the study of grade separation at this heavily congested intersection.

Your concerns about school safety on Watkins Mill Road have been noted. The City of Gaithersburg has determined that Watkins Mill Road from the City limits to Russell Avenue is a candidate for consideration of traffic calming measures. Along Watkins Mill Road within these limits, traffic calming measures under consideration include landscaped medians to narrow the

My telephone number is _____

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Kevin D. Mack
Page Two

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road width; a traffic signal, roundabout or raised crosswalk at the Travis Avenue intersection; and signalization, raised crosswalks or pedestrian refuge areas at the Russell Avenue intersection. In addition, the projected traffic growth along Watkins Mill Road east of MD 355 in the vicinity of the schools, independent from interchange construction and planned development, is being evaluated and will be presented in the final environmental document.

As you may know, impacts to the natural environment have been considered as part of this study. Detailed stormwater management and sediment and erosion control plans will be developed in compliance with permitting agency requirements during final design for the selected alternate. We will continue to actively pursue coordination efforts with the agencies to address avoidance, minimization and mitigation requirements for environmental impacts throughout the project.

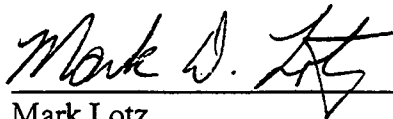
Thank you for explaining the reasons you support a full interchange alternate. At this point, we are currently evaluating the comments received as a result of the public hearing held on January 16, 2001. Once this information is reviewed, including an assessment of the impacts and benefits of each alternate, the SHA will select a preferred alternate. Since the public record for the transcript closed on February 16, 2001, we anticipate identifying a preferred SHA alternate later this Spring. The SHA will then prepare a final environmental document and request approval of the document from the Federal Highway Administration in Fall/Winter, 2001.

Again, thank you for your support and bringing to our attention your concerns. I hope that you remain involved in this study and continue to offer comments. If you should have any questions, please feel free to call Mark Lotz, the project manager, at 410-545-8547 or toll-free at 1-800-548-5026, or email him at mlotz@wtbco.com

Very truly yours,

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

By:



Mark Lotz
Project Manager for
Project Planning Division

cc: File (w/incoming)
The Honorable Parris N. Glendening, Governor
The Honorable Sidney Katz, Mayor, City of Gaithersburg
Mr. John D. Porcari, Secretary of Transportation
City of Gaithersburg Planning Commission
Montgomery County Planning Board
Mr. Mark Lotz, The Wilson T. Ballard Company (w/incoming)

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Mr. Kevin D. Mack
Page Three

bcc: Ms. Anne Elrays, Environmental Manager, State Highway Administration
Mr. James Wynn, Assistant Division Chief, State Highway Administration

Watkins Mill Home Owner's Association

c/o Affiliated Property Management, Inc. P.O. Box 8205 Gaithersburg, MD 20898-8205
Phone: (301) 670-0220 Fax: (301) 548-9044



280

April 6, 2001

Ms. Michelle Hoffman
Project Manager
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Watkins Mill Road Extended

Dear Ms. Hoffman,

At the regularly scheduled Annual Meeting of the Watkins Mill Home Owner's Association held on March 28, 2001, the Board of Directors voted in favor of supporting the proposed Watkins Mill Road Extension and a full interchange with I-270 and the Metropolitan Grove Station as vital elements toward the completion of both the local and regional transportation network.

The Watkins Mill Home Owner's Association represents 317 townhomes located on Watkins Mill Road, near its intersection with Apple Ridge Road. It is the view of the Board that the current disjointed and overburdened road network in the northern Gaithersburg/Montgomery Village area has long been a prime cause of concern for safety and a hindrance to increased property values and quality of life for those of us living in this area. The City of Gaithersburg Master Plan, the Montgomery County General Plan and Master Plan, and the Governor's "Smart Growth" Policy all strongly encourage the completion of existing networks within already developed areas along the I-270 corridor instead of further growth into the green, rural wedges. Additionally, the need for alternatives to roads for long-distance commuting is of paramount importance in controlling and improving the region's growing congestion. The Board feels that this Project will go a long way toward addressing these issues.

It is the opinion of the Board that the three most important issues which this Project faces are Neighborhood access and safety, Multi-modal and mass transit access, and Environmental integration. The Board has daily observed over the past several years that the primary factor constraining safe and effective access within the Project study area is the reliance on the inadequate and overburdened intersection of MD124 and MD355 to provide access out of the Montgomery Village area. This problem was recognized by the City of Gaithersburg in its Master Plan as long ago as 1974. Current national planning thought has recognized the inherent failures of the old curvilinear and cul-de-sac road designs, such as exists here, and has returned to the more logical, efficient, and effective grid system for major streets. In the specific case of the intersection of MD124 and MD355, the most troublesome problem is the conflict between traffic

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flowing on MD124 and traffic turning north onto MD355 from Quince Orchard Road and I-270. The vast majority of these trips can be observed travelling to either the businesses on MD355 between Watkins Mill Road and MD124 or to destinations further north. During the morning rush hour, many of these trips go to the IBM/Lockheed complex. During evening rush hour, these trips are mostly traffic from I-270 with destinations between Watkins Mill Road and Middlebrook Road. The creation of a full interchange at Watkins Mill Road and I-270 would allow for the relief of a significant volume of trips through the MD124/MD355 intersection, as well as the elimination of many double left-turn movements in favor of right-turn movement along this stretch of MD355. Likewise, the intersection of MD117 and MD124 would see significant relief as the large trip volumes from each of these two roads could be spread to two interchanges.

Watkins Mill Road, in its current configuration, suffers from poor traffic control and there is grave concern within the neighborhood for the safety of our children, especially near the schools. The Board has observed that traffic volume on the road is not the main issue; speed and recklessness is. The road is designated in Montgomery County's Gaithersburg Vicinity and Germantown Master Plans as an urban arterial road and was built with four lanes and a center left-turn lane within an 80 foot right of way. The result, especially north of Stedwick Road, has been constant speeding and reckless driving by almost every vehicle using this road. To address safety issues, the Board asks that consideration be given to including within this Project a study and construction of traffic calming measures along the road in order to bring it into character with the neighborhood it serves. Such measures should include removal of the center left-turn lane in favor of a tree-lined median and dedicated left turn lanes at the intersections, neck-down intersections, and pedestrian safety zones and brick crosswalks near the schools.

Access to the MARC station is currently severely limited, but direct access from all four directions to this vital element is essential to its growth as a primary transit stop. Development of integrated mass transit in the form of the MARC, the proposed Corridor Cities Transitway, and other systems is the key to long-term reduction of the regional dependence on I-270 for long-distance commuting. Existing (and future) mass transit depends on access from neighborhoods to the transit stations. Accordingly, the integration of business, commercial, and residential uses nearby and accessible to transit stops is vital to breaking the long unidirectional commutes through the county in favor of shorter omni-directional travel between nearby communities. By shortening and redirecting daily trips, overall trip volume can be reduced. The County's Growth Policy and Master Plan are focused on this goal, but the first step must be in getting viable access to these transit centers.

Finally, the question of Environmental Integration must be addressed whenever there is a project of this scope and magnitude. Nature and Man must coexist in all aspects and the needs of one balanced with the

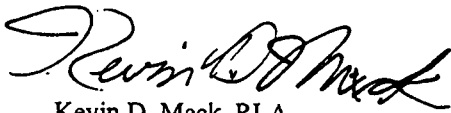
Ms. Michelle Hoffman
RE: Watkins Mill Road Extended
April 6, 2001
Page 3 of 3

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cost to the other; environment impact must be weighed in a long term, global spectrum. The Board recognizes that the temporary disturbance of a small area of wetland habitat does not necessarily mean its destruction, while the continued depletion and burning of limited natural resources is permanent and results in a broad spectrum of pollutions and environmental degradation on a regional, national and global level. Wetland mitigation, reforestation, and other programs have proven effective in the restoration and replacement of past environmental disturbance and will be effective for this Project as well, while a shift to mass transit and the reduction of gridlock will foster a reduction in global pollution and resource depletion.

The Board sees this Project as having this potential and therefore supports its continued study and timely implementation.

Very Truly Yours,



Kevin D. Mack, RLA

Vice President

Watkins Mill Home Owner's Association

Cc: Governor Paris Glendening

Secretary of Transportation John Porcari

Mayor Sidney Katz

City of Gaithersburg Planning Commission

Montgomery County Planning Board



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

April 10, 2001

Miriam W. Daniel, Esquire
109 North Adams Street
Rockville MD 20850

Dear Ms. Daniel:

Thank you for forwarding your client's concerns about noise levels as a result of Maryland's I-270 at Watkins Mill Road Extended project planning study. Your participation in the study is appreciated.

Your concerns, and the reasons that Mr. Popores supports the construction of sound barriers along southbound I-270 at the Caulfield community, are understood. The State Highway Administration (SHA) has evaluated the need for noise abatement based on the existing and projected noise levels for both the build and no-build alternates. For your reference I have enclosed a brochure entitled "Community Resource Guide On Sound Barriers" which provides information on how sound barriers are implemented by SHA. We want to clarify that this project is currently in the planning phase and that final design will not begin until location and design approvals are obtained at the end of this calendar year. As you correctly noted, final decisions on the construction of Type I sound barriers will not be made until the final design stage is underway.

As you know from conversations with SHA representatives on the project team, there have been several modifications to the design of the build alternates since the Location/Design Public Hearing. These revisions, such as the addition of a proposed retaining wall along the eastern edge of Mr. Popores' property, warrant reanalysis of the noise impacts. This reanalysis is soon to be underway. We would like to point out, however, that SHA's policy for combining mitigation costs associated with two noise-sensitive areas (NSAs) applies only to NSAs with an estimated mitigation cost of less than \$100,000 per residence; therefore, the Caulfield NSA may not be eligible for the application of this policy.

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

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

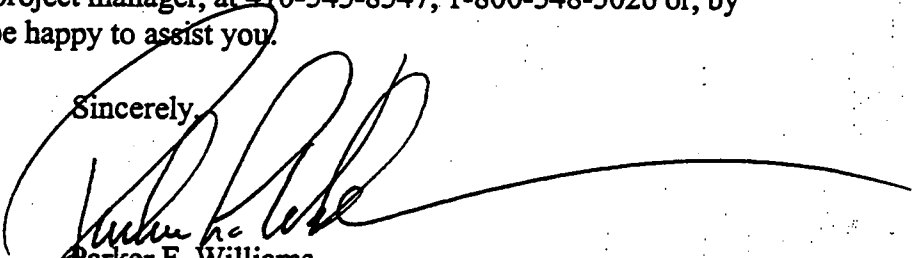
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Ms. Miriam W. Daniel
Page Two

Upon completion of the noise reanalysis, the results along with other environmental impact assessments will be published in the project's final environmental document. This document is scheduled for completion in late Fall of this year. The other concern relative to landscaping will be considered during the design phase.

Thank you again for your participation in this study and for bringing to our attention your client's important concerns. I trust that you will remain involved in this study and continue to offer comments as we progress. If you have any additional questions or concerns, please do not hesitate to contact Mr. Mark Lotz, the project manager, at 410-545-8547, 1-800-548-5026 or, by email, at mlotz@wtbco.com. He will be happy to assist you.

Sincerely,



Parker F. Williams
Administrator

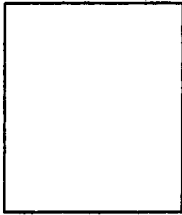
Enclosure

cc: The Honorable Kumar P. Barve, Maryland House of Delegates
The Honorable Jennie M. Forehand, Senate of Maryland
The Honorable Michael R. Gordon, Maryland House of Delegates
The Honorable Cheryl C. Kagan, Maryland House of Delegates

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Ms. Miriam W. Daniel
Page Three

bcc: File (with incoming)
Ms. Anne Elrays, Environmental Manager-PPD, State Highway Administration
Mr. Mark Lotz, Consultant/Project Manager, PPD, State Highway Administration
(with incoming)
Mr. James Wynn, Assistant Division Chief-PPD, State Highway Administration

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STATE HIGHWAY ADMINISTRATION
Project Planning Division

TRANSMITTAL

DATE: March 6, 2001		PROJECT: I-270 and Watkins Mill Extended Project	
DATE ACTION DUE: N/A			
TO: Miriam Daniel		FROM: Anne Elrays	
	FOR YOUR INFORMATION		FOR YOUR APPROVAL
	TAKE APPROPRIATE ACTION		DISCUSS WITH ME
X 1	AS YOU REQUESTED		OTHER:
	FOR YOUR COMMENT		
<u>REMARKS:</u> <u>Thank You for your interest in the project.</u>			
<u>MATERIAL TRANSMITTED:</u>			
1	Environmental Document (Environmental Assessment Section 4(f))		

cc: Lotz

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LAW OFFICES

Miriam W. Daniel

109 North Adams Street
Rockville, Maryland 20850(301) 251-4001
Fax (301) 251-4003Member of MD
& D.C. Bars

March 19, 2001

Parker F. Williams
Administrator of the State Highway Administration
P.O. Box 717
Baltimore Md. 21203-0717
Attn. Mark Lotz

Re: I - 270 at Watkins Mill Road Extended Study

Dear Mr. Williams:

I have been retained by Harry Popores who lives at 11200 Game Preserve Road, Gaithersburg, Maryland 20878. The plans for the I - 270 at Watkins Mill Road Extended Study will have a significant impact on Mr. Popores's home, located in the Caulfield Community, west of I - 270 and adjacent to the south side of Seneca Creek State Park. All four residents of the Caulfield Community, including Mr. Popores, have participated actively in the public meetings conducted by the State Highway Administration. They all support this request for the installation of sound barriers.

The major concern of Mr. Popores and his neighbors is with the noise impact of the expansion at I - 270. The Environmental Assessment Section 4(f) Evaluation of I - 270 at Watkins Mill Road Extended determined that the noise levels at Mr. Popores' home after construction of the roadway will exceed the State Highway Administration's noise impact levels. The predicted noise level at Mr. Popores' residence (receptor R7 in Noise Sensitive Area B - the Caulfield Community) is 77 decibels, far exceeding the Highway Administration's standard noise impact level of 66 decibels. (See page V-36 of Environmental Assessment).

Sound Barriers would certainly be appropriate to protect Mr. Popores' and his neighbors' homes from noise were it not for the issue of cost. The Environmental Assessment concluded that noise mitigation is not warranted for the Caulfield Community because the cost per residence for noise mitigation will be more than \$50,000.00 per residence.

March 19, 2001

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I am writing to request the State Highway Administration to reconsider its initial decision to deny sound barriers to the homes in the Caulfield Community and particularly to Mr. Popores. It is the State Highway Administration's policy to make final decisions on the construction of Type 1 sound barriers during the final design phase of project development. Final project engineering on this project is now taking place and a new plan to construct a retaining wall south of Game Preserve Road and adjacent to the homes of the Caulfield Community is under serious consideration. The new retaining wall changes the project sufficiently so as to justify serious reconsideration of the decision to deny sound barriers to the homes in the Caulfield Community.

According to the Sound Barrier Policy of the Maryland Department of Transportation State Highway Administration (May 11, 1998). "sound barrier cost is based upon the estimated cost of the barrier system, i.e. posts, panels, foundations, and retaining walls required solely to support the sound barrier." (See page 5) Because the retaining wall contemplated at Game Preserve Road is independent of the sound barriers, the State Highway Administration should recompute the cost of the sound barrier per residence for the Caulfield Community and subtract the cost of the construction of the retaining wall from the cost of the construction of the noise barrier.

The State Highway Administration should also recompute the cost/residence for the sound barriers in the Caulfield Community so as to include the entire project. The Sound Barrier Policy provides that for Type 1 projects, it is necessary to look at both the cost/ residence for individual noise sensitive areas and the average cost/ residence for the entire project in determining reasonableness. (See page 5) The State Highway Administration studied the noise levels in two areas, Noise Sensitive Area A, which consists of 79 attached townhouses in the Gunners View Community, west of I - 270 and adjacent to the north side of Seneca Creek State Park and Noise Sensitive Area B, the Caulfield Community, described above, in which Mr. Popores resides. The Environmental Assessment did not examine the average cost/residence for both Area A and Area B combined, but rather examined each area separately. It is now appropriate for the State to re-examine the cost per residence for sound barriers for the Caulfield Community using the new costs for sound barriers discussed above and to average these costs with the costs generated by the Gunners View Community. Moreover, it may be appropriate to include consideration of other residences and community facilities which exist in the

March 19, 2001

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project area when computing an average cost per residence for sound barriers for the Caulfield Community.

Finally, Mr. Popores' residence will directly abut the new roadway structures. Landscape screening may mitigate some of the impact of the new highway construction. I respectfully request the State Highway Administration to give serious consideration to installation of extensive landscaping where the new road abuts the home of Mr. Popores.

I hope that the State Highway Administration will exercise its discretion in this matter so as to give full scope to the intent of the State to protect its citizens from the adverse impact of noise resulting from the construction of state highways.

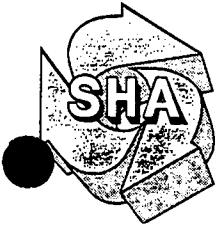
I appreciate your attention to this letter and look forward to your prompt response. Please contact me if you have any questions.

Sincerely,

Miriam Daniel

Miriam Daniel

cc: The Honorable Kumar P. Barve
The Honorable Jennie M. Forehand
The Honorable Michael R. Gordon
The Honorable Cheryl C. Kagan



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

290

April 2, 2001

Mr. A. Benjamin Gore
60 Oak Shade Road
Gaithersburg MD 20878

Dear Mr. Gore:

Thank you for your recent email regarding the project planning study at I-270 and Watkins Mill Road Extended. I appreciate your comments and would like to respond to your questions about this study.

The purpose of this study is to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support designated economic development areas.

In accordance with the National Environmental Policy Act, The State Highway Administration (SHA) has coordinated resource identification, impacts and mitigation with appropriate agencies. That information is included in the environmental document for this project. If you would like to see a copy of the document please contact the following locations during normal business hours:

County Libraries

Gaithersburg Regional Branch
18330 Montgomery Village Avenue
Gaithersburg, MD 20879-3599
Phone: 301-840-2515

Germantown Branch
12900 Middlebrook Road
Germantown, MD 20874-2672
Phone: 301-217-3320

State Highway Administration

District 3 Greenbelt Office
9300 Kenilworth Avenue
Greenbelt, MD 20770
Phone: 301-513-7300

Library - Room C-603
707 North Calvert Street
Baltimore, MD 21202
Phone: 410-545-5573

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

VI C-17

Mr. A. Benjamin Gore
Page Two

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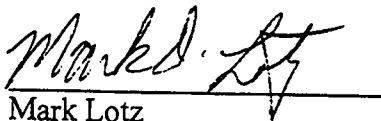
Thank you for explaining your reasons you support Alternate 1 (No-Build). At this point, we are currently evaluating the comments received as a result of the public hearing held on January 16, 2001. Once this information is reviewed, including an assessment of the impacts and benefits of each alternate, the SHA will select a preferred alternate. Since the public record for the transcript closed on February 16, 2001, we anticipate identifying a preferred SHA alternate later this Spring. The SHA will then prepare a final environmental document and request approval of the document from the Federal Highway Administration in Fall/Winter, 2001. For your reference, I have enclosed a copy of the public hearing brochure which provides information on the alternates under consideration in this study.

Again, thank you for bringing to our attention your important concerns. I hope that you remain involved in this study and continue to offer comments. Please also note that your name has been added to the project's mailing list to keep you informed of future developments. If you should have any questions, please feel free to call Mark Lotz, the project manager, at 410-545-8547 or toll-free at 1-800-548-5026, or email him at mlotz@wtbco.com

Very truly yours,

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

By:



Mark Lotz
Project Manager for
Project Planning Division

Enclosure

cc: File (w/incoming)
Ms. Anne Elrays, Environmental Manager, State Highway Administration
Mr. James Wynn, Assistant Division Chief, State Highway Administration

292

From: "A. Benjamin Gore" <thebravecowboy@juno.com>
To: <planning@sha.state.md.us>
Date: 3/27/01 2:21PM
Subject: Proposed extension of Watkins Mill Rd.

To whom it may concern:

I am writing you today to adamantly oppose the connection of Watkins Mill Rd and West Watkins Mill Road as well as new interchange with I270 in Gaithersburg. Any expansion of this road will open up a major green space for development. This development is both unnecessary and unwanted. If the interchange is built, as many as 1,000 new houses may be built. This will increase traffic and air pollution.

I grew up in the area proposed for development it provides important shelter for both wildlife and residents of the surrounding communities. That land is my history.

The extension of Watkins Mill Road does not serve any public interest, only the private interest of developers out to make a dollar. I am very concerned about the extreme developments being planned for this area. I am an extremely informed citizen and I hadn't heard about any proposals until today. When are public hearings being scheduled for, I, and I'm sure many others, would love to comment on this.

Also I would like to request that you send me a copy of the Draft Environmental Impact Statement for this proposed road.

Thank you,

A. Benjamin Gore

60 Oak Shade Road
Gaithersburg, Maryland 20878
301.990.7168

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**Maryland Department of Transportation
State Highway Administration**

March 23, 2001

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Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

Ms. Mary D. Hurley
11230 Game Preserve Road
Gaithersburg MD 20878

Dear Ms. Hurley:

Thank you for your recent letter regarding the project planning study at I-270 and Watkins Mill Road Extended. Your comments about the possible construction of an interchange are appreciated.

A cost/benefit analysis has been completed as part of this study. Currently, the utilization of the Metropolitan Grove MARC Station, based on license plate surveys conducted in March-May, 2000 (144 daily riders and 42% daily usage of the existing parking lot) is low for a MARC station. However, although it is important to improve access to this MARC Station in order to facilitate increased transit use, this is not the primary focus of the study. The adequacy of public facilities (such as fire, police and schools) is addressed at the City and County levels. The land use assumptions used for this project are contained in the approved and adopted Round 6A Constrained Long Range Plan cooperative forecast developed by the Metropolitan Washington Council of Governments (MWCOG). Based on the MWCOG forecast, up to 95% of the maximum build-out is expected to occur regardless of the outcome of this project. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support these designated economic development areas.

In addition, thank you for expressing your concerns about the impacts that construction of an interchange may have on the environment. Detailed stormwater management and sediment and erosion control plans will be developed in compliance with permitting agency requirements during final design in order to minimize impacts on local streams. We will continue to actively pursue coordination efforts with the agencies to meet avoidance, minimization and mitigation requirements for environmental impacts throughout the project. Impacts to local wildlife have also been considered by the study team as part of the alternates evaluation process.

Thank you for explaining the reasons you support Alternate 1 (No-Build). At this point, we are evaluating comments as a result of the public hearing. Once all of this information is reviewed, including an assessment of the impacts and benefits of each alternate, the State Highway Administration (SHA) will select a preferred alternate. Since the public record for the transcript closed on February 16, 2001, we anticipate identifying a Selected SHA Alternate later this Spring. The SHA will then prepare a final environmental document and request approval of the document from the Federal Highway Administration in Fall/Winter, 2001.

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

294

If you would like to see a copy of the Environmental Assessment please contact the following locations:

County Libraries

Gaithersburg Regional Branch
18330 Montgomery Village Avenue
Gaithersburg, MD 20879-3599
Phone: 301-840-2515

Germantown Branch
12900 Middlebrook Road
Germantown, MD 20874-2672
Phone: 301-217-3320

State Highway Administration

District 3 Greenbelt Office
9300 Kenilworth Avenue
Greenbelt, MD 20770
Phone: 301-513-7300

Library - Room C-603
707 North Calvert Street
Baltimore, MD 21202
Phone: 410-545-5573

Again, thank you for your interest and participation in this study. I hope that you remain involved in this study and continue to offer comments as we progress. If you should have any questions, please feel free to call Mark Lotz, the project manager, at 410-545-8547 or toll-free at 1-800-548-5026, or email him at mlotz@wtbco.com.

Very truly yours,

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

By: Jeremy L. Baek Sr.
Mark Lotz
Project Manager for
Project Planning Division

cc: File (w/incoming)
Mr. Lorenzo Bryant, Mass Transit Administration
Ms. Anne Elrays, State Highway Administration
Mr. James Wynn, State Highway Administration

February 13, 2001

Ms. Cynthia D. Simpson, Deputy Director
Office of Planning and Preliminary Engineering
Maryland Department of Transportation
P.O. Box 717
Baltimore, Maryland 21203

Dear Ms. Simpson:

We have yet to hear the approximate costs for the Watkins Mill Road study. My questions:

- ▲ Has there been a cost/benefit analysis done?
- ▲ It seems that the several millions of dollars cost is extremely high for an increase in ridership of 201 people on the MARC.
- ▲ Have the costs to the City of Gaithersburg as a result of more development been considered (such as fire, police, schools)? How does the income from anticipated development offset the costs of such development?
- ▲ What are to environmental costs? Construction during a three year period will certainly drive away the current birds and animals which now consider this area home. The stream feeding into Great Seneca will certainly be affected. What are the consequences to Great Seneca?
- ▲ What has been the finding of the Environmental Assessment?

I have never been an advocate of "no growth," but this seems not to be a case of "smart growth." Do we really want that 80+- acres to be destroyed?

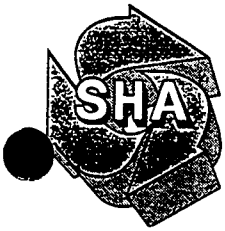
Would the residents of Montgomery County be better served by (if the state has money for such a project) buying the land for an extension of Seneca Park?

I continue to support Alternate 1 (the no-build alternate).

Sincerely,



Mary D. Hurley
11230 Game Preserve Road
Gaithersburg, Maryland 20878
301/417-2870



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

March 22, 2001

Mr. Edward L. Jordan
11220 Game Preserve Road
Gaithersburg MD 20878

Dear Mr. Jordan:

Thank you for your recent comments regarding the project planning study at I-270 and Watkins Mill Road Extended, and for expressing your concern over the possible construction of an interchange. In addition, thank you for submitting a written copy of your public hearing comments. Your comments and our earlier response, dated January 31, 2001, have been added to the public record for this study.

Traffic is a critical concern in the I-270 at Watkins Mill Road study. Traffic volumes are expected to increase over the next 20 years regardless of the outcome of this project, based on the projected growth and planned development within northern Gaithersburg. This project aims to find a transportation improvement that works within the existing environment to provide better accessibility, congestion relief, and a safer transportation network. The proposed build alternates improve traffic in the project area by reducing travel distances and travel times for I-270 traffic going to and from development areas, reducing the number of signalized intersections through which I-270 traffic must travel to reach development areas and reducing traffic volumes at existing signalized intersections, such as the MD 117 and MD 124 intersections with MD 355. Modifications to the I-270/Middlebrook Road interchange are being considered as part of the I-270/US 15 Multi-Modal Corridor Study. For questions about this interchange please contact Steve Plano, the project manager of the Corridor Study, at 410-545-8547 or by email at plano@pbworld.com.

A design similar to your suggestion for more direct access to the Metropolitan Grove MARC Station was considered as Access Option C in this study. This option will not be selected because of the additional traffic that would be placed on the MD 124 exit ramp from southbound I-270. Providing access through the State Highway Administration (SHA) maintenance facility was not considered because it would promote even higher volumes and turning movements on an already congested segment of MD 124.

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 land use assumptions for this study were based on the land use contained in the Round 6A Constrained Long Range Plan cooperative forecast developed by the Metropolitan Washington Council of Governments (MWCOC). Based on the City of Gaithersburg's approved land use, up to 95% of the maximum build-out is expected to occur even if no roadway improvements are made. Montgomery County and the City of Gaithersburg are currently reviewing these land use forecasts in order to confirm that they are consistent with the MWCOC model. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support these designated economic development areas.

As you know from the March 1 focus group meeting, Alternate 3 has been revised by shifting the I-270 mainline slightly to the east, and realigning the northwest ramp of the interchange so that it ties into I-270 further south. These changes decrease the right-of-way impacts to the Caulfield community and remove the need for the one proposed residential displacement from that community. In addition, noise impacts to the Caulfield community have been studied as part of this project. The results of a detailed noise analysis for noise sensitive area "B", in closest proximity to this community, indicates that a sound barrier is not warranted as a result of this project. Further analysis will be completed if required, and included in the final environmental document.

Detailed stormwater management and sediment and erosion control plans will be developed in compliance with permitting agency requirements during final design in order to minimize impacts on local streams. We will continue to actively pursue coordination efforts with the agencies to meet avoidance, minimization and mitigation requirements for environmental impacts throughout the project.

Thank you for explaining the reasons you do not support a full interchange. At this point, we are evaluating comments as a result of the public hearing. Once all of this information is reviewed, including an assessment of the impacts and benefits of each alternate, the SHA will select a preferred alternate. Since the public record for the transcript closed on February 16, 2001, we anticipate identifying a Selected SHA Alternate later this Spring. The SHA will then prepare a final environmental document and request approval of the document from the Federal Highway Administration in Fall/Winter, 2001.

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Again, thank you for your interest in this study and for sharing your concerns on the build alternates, traffic and school safety. The study team will consider your comments. I hope that you remain involved in this study and continue to offer comments as we progress. If you should have any questions, please feel free to contact Mark Lotz, the project manager, at 410-545-8547 or toll-free at 1-800-548-5026, or by email at mlotz@wtbco.com.

Very truly yours,

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

By: Jeremy L Beck for
Mark Lotz
Project Manager for
Project Planning Division

cc: Transcript (with incoming)
Ms. Anne Elrays, State Highway Administration
Mr. Steve Plano, Parsons Brinckerhoff
Mr. James Wynn, State Highway Administration

299
Feb 14, 2001

Summary of Caulfield Community Comments

Represented by Edward L Jordan

11220 Game Preserve Rd

Gaithersburg MD 20878

301-977-2241

ed@xselling.com

We have provided written and oral comments at the Nov 23, 1999 workshop, the Jan 16, 2001 Public Hearing and the Jan 29, 2001 Gaithersburg City Council meeting. Copies of my written statements are attached for completeness. I would like to summarize our concerns for consideration in making a recommendation relating to Watkins Mill road extension and any interchange with I-270:

1. Any interchange with I-270 would constitute a self-fulfilling prophecy for traffic congestion particularly in conjunction with over-development of the land between Watkins Mill extension and the CSX tracks.
2. Alternatives which assume a need for further southbound egress from I-270 didn't consider completing the nearest I-270 interchange at Middlebrook Rd which curiously didn't include a Southbound egress in its construction. Building an exit at Middlebrook would be a much simpler task with less environmental impact and no effect on nearby residences or businesses.
3. Alternatives which assume a need for more direct access from I-270 to Metropolitan Grove MARC failed to consider a much simpler, less expensive and direct pathway through existing State Highway Administration maintenance property on the South side of CSX railway at the I-270 to Montgomery Village intersection.
4. No consideration was given to a no-development option which would purchase the land for parkland green space. The cost would be much less especially when you recognize no need for added school, police, utility etc and the projected increase in traffic would not occur. Many communities are considering the no-development alternative as preferred

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and I believe this virgin woodland and wetland is one Gaithersburg, the county and State should preserve for future generations.

5. No effort was found in the study to minimize impact on the Caulfield residences by shortening the proposed I-270 Southbound egress ramps and by promising construction of acoustic barriers. Widening I-270 adjacent to the Caulfield residences would destroy the remaining natural sound barrier of the hill opposite the nearest point on I-270. That failure to recognize the severe impact of destroying one homesite and leveling of a hillside that is a natural acoustic barrier indicates a lack of consideration personal impact as well as elevations of the land.
6. The alternatives also failed to recognize the elevations of wetland and roadways that would destroy the creek bed wetland where it passes through the PEPCO right-of-way. The extensive development would destroy the absorption of water into the woodlands that form the basis for springs that feed the creek. That same development would create a flushing action from runoff of rain that would turn the lovely wetland and creek into a drainage ditch. I seriously question whether anyone who is studying the alternatives has walked the land under review.

The Caulfield residents object to any alternative that creates an interchange with I-270 and Watkins Mill Road. The residents question the need for an expensive extension of Watkins Mill Rd but recognize we would benefit from reduced traffic on Game Preserve Rd that would result.


Edward L. Jordan



**Maryland Department of Transportation
State Highway Administration**

301
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

March 15, 2001

Dr. Thomas F. McKinney
19669 Brassie Place
Montgomery Village MD 20886

Dear Dr. McKinney:

Thank you for your recent letter regarding Maryland's project planning study at I-270 and Watkins Mill Road Extended. Your comments about why you support Alternate 1 (No-Build) and this project's compliance with the National Environmental Policy Act (NEPA) are appreciated.

The purpose of this study is to improve vehicular, pedestrian and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support these designated economic development areas.

In accordance with NEPA policy, the State Highway Administration (SHA) has coordinated with the Federal Highway Administration (FHWA) to determine the required level of environmental documentation, including Section 4(f) requirements for this project. FHWA agreed that the Environmental Assessment was the appropriate level of documentation. At the preliminary alternates stage, the anticipated range of possible impacts to all resources was presented to various state and federal agencies. These agencies are integral parties in our project development process as required under NEPA.

At this stage of alternates analysis and comparison, detailed drainage evaluations are not performed; however, allowances for stormwater management facility costs and right-of-way impacts have been made. Multiple potential stormwater management facility locations have been identified for each alternate. Detailed hydrologic and hydraulic studies and stormwater management and sediment and erosion control plans will be developed in compliance with permitting agency requirements during final design for the selected alternate. We will continue to actively pursue coordination efforts with the agencies to address avoidance, minimization and mitigation requirements for environmental impacts throughout the project.

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

VI C-28

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Traffic impacts and safety are critical concerns in the I-270 at Watkins Mill Road Extended study. The City of Gaithersburg has determined that Watkins Mill Road from the City limits to Russell Avenue is a traffic calming study road. Along Watkins Mill Road within these limits, traffic calming measures under consideration include landscaped medians to narrow the road width; a possible traffic signal, roundabout or raised crosswalk at the Travis Avenue intersection; and signalization, raised crosswalks or pedestrian refuge areas at the Russell Avenue intersection. Additional traffic studies are currently underway along Watkins Mill Road east of MD 355 and will be presented in the final environmental document.

The land use assumptions used for this project are contained in the approved and adopted Round 6A Constrained Long Range Plan cooperative forecast developed by the Metropolitan Washington Council of Governments (MWCOC). Based on the City of Gaithersburg's approved land use, up to 95% of the maximum development is expected to occur regardless of the outcome of this project. Because of the small difference between "less than full" and "full" build out, one land use assumption is sufficient for application to all alternates. Montgomery County and the City of Gaithersburg are currently reviewing the land use forecasts in order to verify that they are consistent with the MWCOC model.

Thank you for explaining the reasons that you support the No-Build Alternate. At this point, we are compiling all of the comments received as a result of the public hearing. Once this information is reviewed, the SHA will select a preferred alternate. Since the public record for the transcript closed on February 16, 2001, we anticipate having a Selected SHA alternate later this spring. The SHA will then prepare a final environmental document and request approval of the document from the FHWA in Fall/Winter, 2001.

Again, thank you for your interest in this study and for sharing your concerns about this project's NEPA compliance. I hope you remain involved in this study and continue to offer comments as we progress. If you have any questions, please feel free to reach Mark Lotz, the project manager, at 410-545-8547, toll-free at 1-800-548-5026, or by email at mlotz@wtbco.com.

Very truly yours,

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

By:

Jeremy L. Beck for
Mark Lotz
Project Manager for
Project Planning Division

303

cc: File (w/incoming)
Ms. Anne Elrays, State Highway Administration
Ms. Mona Sutton, State Highway Administration
Mr. James L. Wynn, State Highway Administration

304

Thomas F. Mc Kinney
19669 Brassie Place
Montgomery Village, MD 20886-1911
February 20, 2001

Ms. Nadia Pimentel, Project Engineer
State Highway Administration
Maryland Department of Transportation
Project Planning Division
707 N. Calvert Street
Baltimore, MD 21202

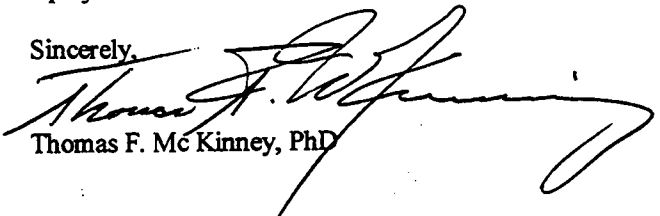
Re: I-270 at Watkins Mill Road
Project No. MO839B11 – Comments on the Environmental
Assessment

Dear Ms. Pimentel:

I concur with the decision by the Montgomery Village Board of Directors to support the "no build" alternate, following the recommendation of the TD&PE committee. I have reviewed the EA and would like to add the following comments in support of this decision:

- It is not clear why a full Environmental Impact Assessment (EIS) was not conducted given the magnitude of the impacts outlined.
- As noted by the Board, the EA ignores the potential impacts on safety along Watkins Mill Road in Montgomery Village where four schools and a park will be impacted.
- The EA does not comply with the National Environmental Policy Act (NEPA) in its analysis of alternates. As pointed out in the EA in a number of places, this proposed project is driven by plans for "full" or "maximum" build out or development in northern Gaithersburg area for the IBM/Lockheed Martin, Bennington Corp., and Casey Tracts. While it is stated that full development in this area is not possible without the additional transportation infrastructure, aside from the "no build" alternate, analysis was not conducted on less-than-full development alternates for these tracts, thus violating NEPA alternates analysis requirements.
- In a similar fashion the requirements of Section 4(f) of the Department of Transportation Act of 1966 are not met by the EA. Section 4(f) indicates that the Department shall not approve any project which requires the use of land from a publicly owned public park, recreation area, wildlife or waterfowl refuge site unless there is no feasible and prudent alternate to the use of the project resources. It also requires that alternates include all possible planning to minimize harm to the property. Seneca Creek State Park and Middlebrook Hill Neighborhood Conservation Area will be affected by all the build alternates except Alternate 3, which has other substantial impacts. The lack of less-than-full development alternates evaluation as noted above for NEPA is also clearly in violation of Section 4(f) considerations where only maximum development is considered.
- The EA indicates that drainage areas, including Seneca State Park, will be impacted by increased runoff and related flooding and sediment impacts due to various build alternates. However, a detailed analysis is not provided to indicate the magnitude of these impacts and the size and location of mitigative measures which may be required. It is thus not known whether the necessary measures such as storm water management basins or ponds can be feasibly located and sized in this area, given the proposed maximum development which drives the project.

Sincerely,


Thomas F. Mc Kinney, PhD

Cc: Montgomery Village News



Maryland Department of Transportation
State Highway Administration

305
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

March 15, 2001

Ms. Martha L. Cadle
Montgomery Village Citizens Coalition
9533 Tippet Lane
Montgomery Village MD 20886

Dear Ms. Cadle:

Thank you for your recent letter regarding the project planning study at I-270 and Watkins Mill Road Extended, as well as for expressing your concern over the possible construction of an interchange. Your comments are appreciated and have been added to the public record for this study.

Your concern about the possible effects that construction of an interchange at I-270 and Watkins Mill Road may have on traffic and school safety in the Montgomery Village area has been noted. In coordination with the City of Gaithersburg and the Maryland-National Capital Park and Planning Commission (M-NCPPC), the study area has been expanded to evaluate in more detail the traffic implications of the alternates under consideration on segments of Watkins Mill Road between MD 355 and Great Seneca Creek. We will be reporting the results of these supplemental studies as they become available in March and early April. The City of Gaithersburg has determined that Watkins Mill Road from the City limits to Russell Avenue is a traffic calming study road. Along Watkins Mill Road within these limits, traffic calming measures under consideration include landscaped medians to narrow the road width; a possible traffic signal, roundabout or raised crosswalk at the Travis Avenue intersection; and signalization, raised crosswalks or pedestrian refuge areas at the Russell Avenue intersection.

Many of the issues raised in your letter pertain to roadways that are owned and maintained by Montgomery County. Your letter has been forwarded to the Montgomery County Department of Public Works and Transportation staff for their consideration.

We appreciate your comments regarding the other needed transportation improvements in the area. The I-270/US 15 Multi-Modal Corridor Study is entering the Detailed Studies stage of project planning for various improvement alternatives, including the Corridor Cities Transitway and the upgrading of the I-270/MD 117 and I-270/Middlebrook Road interchanges. The State Highway Administration (SHA) also recognizes that the Congestion Relief Study improvement to the MD 124/MD 355 intersection, soon to be constructed, is only an interim solution. The SHA is committed to working with local area officials to prioritize the study of a grade separation at this heavily congested intersection.

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
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Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717
Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

306

Thank you for explaining the reasons you support Alternate 1 (No-Build). At this point, we are evaluating comments as a result of the public hearing. Once all of this information is reviewed, including an assessment of the impacts and benefits of each alternate, SHA will select a preferred alternate. Since the public record for the transcript closed on February 16, 2001, we anticipate identifying a Selected SHA Alternate later this Spring. The SHA will then prepare a final environmental document and request approval of the document from the Federal Highway Administration in Fall/Winter, 2001.

Again, thank you for your interest in this study and for sharing your concerns on the build alternates, traffic and school safety. The study team will consider your comments. I hope that you remain involved in this study and continue to offer comments as we progress. If you should have any questions, please feel free to contact Mark Lotz, the project manager, at 410-545-8547 or toll-free at 1-800-548-5026, or by email at mlotz@wtbco.com.

Very truly yours,

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

By: Jeremy L. Beck
Mark Lotz
Project Manager for
Project Planning Division

cc: Transcript (with incoming)
Ms. Jean Chait, Montgomery County Department of Public Works & Transportation
(w/incoming)
Ms. Anne Elrays, Environmental Manager, State Highway Administration
Mr. James Wynn, Assistant Division Chief, State Highway Administration

MONTGOMERY VILLAGE
CITIZENS' COALITION

February 13, 2001

307

Mr. Mark Lotz, Project Manager
I-270 Watkins Mill Road Extended
State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

RE: I-270 Watkins Mill Road Extended Project

Dear Mr. Lotz:

We Support Alternate 1: No Build

We never envisioned as much traffic on Watkins Mill Road (our inner Village road) as the study projects for all the other alternatives. That's 20,400 to 25,100 vehicles a day in 2020.

Four schools are located along Watkins Mill Road. Village students are not bused. They walk along and across this road every school day.

This is a dangerous situation. We cannot tolerate or support that kind of traffic.

None of our concerns about this traffic have been addressed; not those listed in our December 9, 1999 letter to the State Highway Administration (SHA) nor those expressed at the recent hearing January 16, 2001 nor at your presentation February 6, 2001 at the meeting of the Montgomery Village Foundation (MVF) Board and its Transportation, Development and Public Facilities (TD&PF) Committee.

Some of our concerns:

- The Village and the roads within the Village, back to Wightman and Snouffer School Roads, were not included in the study.
- The study area should have been extended to include I-270 from Shady Grove Road to Germantown, west to Great Seneca Highway, and east to Brink, Wightman and Snouffer Roads.

- 308
- The County representatives at the February 6, 2001 meeting were not responsive to our safety issues on Watkins Mill Road in the Village.

They stated the County would do nothing until the extension was built and we had a bad traffic problem. They stated that Watkins Mill Road is an arterial road which was built for 4 lanes so they couldn't do much anyway. Eventually it would be striped for 4 lanes which would not improve the safety.

- Concerns about the environment; damage to wetlands, wildlife, trees and air quality were not adequately addressed, including pollution from all that traffic in the Village.

Before we would support a Watkins Mill Road Extension the County would have to do several things to take traffic off of MVAvenue and Watkins Mill Road.

- The County would have to widen Goshen, Brink, Wightman and Snouffer School Roads to 4 lanes.
- The County Council would need to change the designation of Watkins Mill Road in the Master Plan to a primary road in the Village because of the 4 schools on this road.

The SHA working with the Federal Highway Administration (FHA) and the County Government would have to do several things to improve traffic for the Village and for the \$4.6 million dollar new development in northern Gaithersburg which is the reason for this Watkins Mill Road Extended project. See page 2 of the November 1999 and page 3 of the December 2000 brochures "PURPOSE OF THE STUDY."

- The State should have the final planning phase completed for the Corridors Cities Transitway to Comsat.
- The State should have begun planning a grade separated interchange at MVAve (MD 124 and MD 355).
- The State should have completed a **maximum** upgrade of the interchanges at both MD 117 and Middlebrook Road on I-270.
- The State would widen Muncaster Mill Road to 4 lanes.

When these State projects are nearing construction or finished and the County has widened our roads and declared Watkins Mill Road a primary road, we will reconsider our support for Watkins Mill Road Extended.

309

Sincerely,

Montgomery Village Citizens Coalition Board Members:

Martha L. Cadle
Martha L. Cadle
9533 Tippet Lane
Montgomery Village, MD 20886
301-869-7755

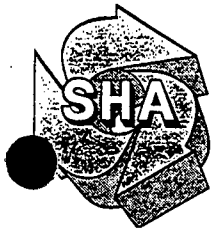
Janice M. Watson
Janice M. Watson
19169 Roman Way

Anne B. Swain
Anne B. Swain
20653 Beaver Ridge Rd.

Robert E. LaVilla *Sara L. LaVilla*
Robert E. LaVilla Sara L. LaVilla
19164 Roman Way 19164 Roman Way

Jane Ann S. Wilder *Richard D. Wilder*
Jane Ann S. Wilder Richard D. Wilder
9969 Lake Landing 9969 Lake Landing

cc: Blair Ewing, President and Council Members
Douglas Duncan, County Executive
Sue Edwards, I-270 Team Leader, MNCPPC
Joan Stern, Paul Carlson, Charles Barkley, Delegates D-39
Patrick J. Hogan, Senator D-39
Craig Capen, President and MVF Board Members
Sharon Levine, MVF Director of Government Relations for TD&PF Members



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

February 12, 2001

Mr. G. Thomas Waite, III
Humane Society of the United States
700 Professional Drive
Gaithersburg MD 20879

Dear Mr. Waite:

Thank you for your interest in the I-270 at Watkins Mill Road Extended study. We have received your letter regarding the alternates under consideration for this project planning study. Your comments are appreciated and have been added to the public record.

As you know, the purpose of this study is to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support designated economic development areas.

Thank you for expressing your concerns regarding possible right-of-way impacts to your property's stormwater retention pond and parking lot. Although all of the impacts still need to be quantified to better understand the effects that each proposed alternate will have, right-of-way impacts are being considered as part of this study.

At this point, we are still receiving comments as a result of the public hearing held on January 16, 2001 and availability of the Environmental Assessment. Once the public record for the transcript closes on February 16, 2001, we anticipate identifying a preferred State Highway Administration (SHA) Alternate later this Spring. The SHA will then prepare a final environmental document and request approval of the document from the Federal Highway Administration in Fall/Winter, 2001.

My telephone number is _____

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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

VI C-37

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Mr. G. Thomas Waite, III
Page Two

Again, thank you for your interest in this study and for sharing your concerns. I hope that you remain involved in this study and continue to offer comments as we progress. If you should have any questions, please feel free to call me at 410-545-8547 or toll-free at 1-800-548-5026 or by email at mloetz@wtbco.com.

Very truly yours,

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

By: Nadia Pimentel for
Mark Lotz
Project Manager for
Project Planning Division

cc: Transcript (with incoming)
Ms. Anne Elrays, State Highway Administration (with incoming)
Mr. James L. Wynn, State Highway Administration

Mr. G. Thomas Waite, III
Page Three

312

bcc: Mr. Brian Horn, RK&K (with incoming)
Mr. Mark Lotz, The Wilson T. Ballard Company (with incoming)

313

From: Thomas Waite
To: mhoffman@sha.state.md.us
Subject: Re: I-270 Watkins Mill Road Extended Planning Study

By Mail and E-mail

Ms. Michelle Hoffman
Project Director
Project Planning Division, Mail Stop C-301
State Highway Administration
P.O. Box 717
Baltimore, MD 21203-0717

Dear Ms. Hoffman:

The Humane Society of the United States, located at 700 Professional Drive, Gaithersburg, MD 20879, has serious concerns about the proposed extension of Watkins Mill Road to I-270 and the planned interchange with I-270. Accordingly, we note that our storm water retention pond and a large number of parking spaces will be "taken" as a part of this improvement. Additionally, we have concerns that the land area taken as part of this improvement may severely impact the land area left to further develop our property.

The Society has a responsibility to its donors and constituents to protect the value of its property and we will seek the appropriate means to do so. We urge that our interests be considered and protected in these and future development plans.

Should you have questions, please call me at 301-258-3018 or, e-mail me at the above address or, write me at 700 Professional Drive, Gaithersburg, MD 20879. I thank you for your assistance in this matter.

Very truly yours,

G. Thomas Waite, III
Treasurer, CFO
The Humane Society of the United States
January 16, 2001

cc. Alfred Blumberg, AICP
Robert Dalrymple, Esq.
Nathan Greenbaum, Esq.

CC: Al Blumberg; Bob Dalrymple; Carolyn Wandless; N...

314

From: "Thomas Waite" <twait@hsus.org>
To: <mhoffman@sha.state.md.us>
Date: 1/16/01 2:10PM
Subject: Re: I-270 Watkins Mill Road Extended Planning Study

By Mail and E-mail

Ms. Michelle Hoffman
Project Director
Project Planning Division, Mail Stop C-301
State Highway Administration
P.O. Box 717
Baltimore, MD 21203-0717

Dear Ms. Hoffman:

The Humane Society of the United States, located at 700 Professional Drive, Gaithersburg, MD 20879, has serious concerns about the proposed extension of Watkins Mill Road to I-270 and the planned interchange with I-270. Accordingly, we note that our storm water retention pond and a large number of parking spaces will be "taken" as a part of this improvement. Additionally, we have concerns that the land area taken as part of this improvement may severely impact the land area left to further develop our property.

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Should you have questions, please call me at 301-258-3018 or, e-mail me at the above address or, write me at 700 Professional Drive, Gaithersburg, MD 20879. I thank you for your assistance in this matter.

Very truly yours,

G. Thomas Waite, III
Treasurer, CFO
The Humane Society of the United States
January 16, 2001

cc. Alfred Blumberg, AICP
Robert Dalrymple, Esq.
Nathan Greenbaum, Esq.

CC: <cwandless@hsus.org>, <crd@linowes-law.com>, <njg@linowes-law.com>,
<asb@sitesolutionsinc.net>



**Maryland Department of Transportation
State Highway Administration**

315
Parris N. Glendening
Governor
John D. Porcari
Secretary
Parker F. Williams
Administrator

February 6, 2001

Mr. David D. Freishtat
Shulman, Rogers, Gandal, Pordy & Ecker, P.A.
11921 Rockville Pike
Rockville MD 20852-2743

Dear Mr. Freishtat:

Thank you for your letter regarding the alternates being considered for the I-270/Watkins Mill Road Extended project planning study. We appreciate your views regarding the potential impacts to the ARE properties, and we have added your comments to the public record.

As you know, this study seeks to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support designated economic development areas.

At this point, we are still receiving comments from the public as a result of the public hearing held on January 16, 2001, as well as from the environmental regulatory agencies. Once all of this information is collected and the impacts and benefits of each alternate have been assessed, the State Highway Administration (SHA) will select a preferred alternate. Because the public record for the transcript will close on February 16, 2001, we expect SHA to select an alternate later this Spring. The SHA will then prepare a final environmental document for the preferred alternate and will request approval of the document and preferred alternate from the Federal Highway Administration sometime this Fall or next Winter.

As noted at the public hearing, the design and impacts of Access Option B (Metropolitan Court Extended) will need to be reevaluated in light of the recently constructed roadway and parking improvements, the revised parcel layout in the West Watkins Mill Road area, and other information that you recently provided to us. This reevaluation is underway, and we will contact you with our findings prior to the selection of a preferred alternate.

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

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1-800-735-2258 Statewide Toll Free

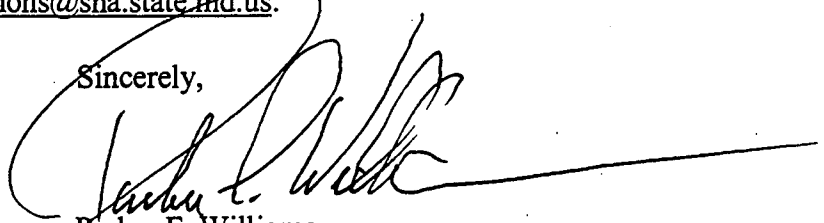
Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717
Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

Mr. David D. Freishtat
Page Two

3/10

Thank you again for your letter and for sharing your information about Option B impacts. I trust that you will remain involved in this study and continue to offer comments as we progress. If you have any additional questions or concerns, please do not hesitate to contact Mr. Douglas Simmons, SHA's Director of Planning and Preliminary Engineering, at 410-545-0411, 1-888-204-4828 or, by email, at dsimmons@sha.state.md.us.

Sincerely,



Parker F. Williams
Administrator

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

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Mr. David D. Freishtat
Page Three

bcc: Ms. Anne Elrays, Environmental Manager, State Highway Administration (w/incoming)
Mr. Mark Lotz, The Wilson T. Ballard Company (w/incoming)
Mr. Charlie K. Watkins, District Engineer, State Highway Administration
Mr. James L. Wynn, Assistant Division Chief, State Highway Administration

SHULMAN ROGERS GANDAL PORDY & ECKER, P.A.

Lawrence A. Shulman
Donald R. Rogers
Larry N. Gandal
Karl L. Ecker†
David A. Pordy+
David D. Freishtat
Martin P. Schaffer
Christopher C. Roberts
Jeffrey A. Shane
Edward M. Hanson, Jr.
David M. Kochanski
James M. Kefauver
Rebecca Oshway
Robert B. Canter
Daniel S. Krakower
Kevin P. Kennedy

Alan B. Sternstein
Nancy P. Regelin
Samuel M. Spiritos+
Martin Levine
Bahman Z. Lotfi+
Leonard R. Goldstein
Worthington H. Talcott, Jr.+
Fred S. Sommer
Morton A. Faller
Alan S. Tilles
James M. Hoffman
Michael V. Nakamura
Jay M. Eisenberg+
Ashley Joel Gardner
Michael J. Froehlich
Douglas K. Hirsch

William C. Davis, III
Paul A. Bellegarde+
Kim Viti
Ross D. Cooper
Patrick M. Martyn+
Karl J. Protil, Jr.+
Elizabeth A. White
Sandy David Baron
Christine M. Sorge
Sean P. Sherman+
Barry P. Miller+
Gregory D. Grant+
Karl W. Means
Debra S. Friedman+
Dwayne M. Toliver

Simon M. Nadler
Pariss M. Afshari+
Jeffrey W. Rubin
Fern J. Brodney
Matthew M. Moore
Daniel H. Handman+
Deborah L. Moran
Geoffrey A. Davis
Robert S. Tanner+
Martin J.A. Yeager+
Jack Kuffel+
Eric J. von Vorys
Jack M. Ross+
Michelle R. Curtis+
Gary I. Horowitz+
Jason M. Kerben+

Of Counsel
Richard P. Meyer+
Glenn C. Etelson
Robert B. Ostrom+
William Robert King
David E. Weisman
Lawrence Jay Eisenberg

Maryland and D.C.
except as noted:
+ Virginia also
• Maryland only
• D.C. only
† Retired
◊ D.C. & Virginia only

Writer's Direct Dial Number:

301/230-5206

dfreishiat@srgpe.com

January 16, 2001

Mr. Parker F. Williams, Administrator
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

Re: ARE-Metropolitan Grove I, LLC/ I-270 at Watkins Mills Road Extension Project
Our File No.: 029.424.00006

Dear Mr. Williams:

This Firm represents ARE-Metropolitan Grove I, LLC; ARE-25/35/45 W. Watkins Mill Corp.; and ARE-50 West Watkins Mill, LLLC, (hereinafter referred to collectively as "ARE"), the owner of Lots 17, 18, 19, 25, 35, 45 and 50, located in the vicinity of West Watkins Mill Road and Metropolitan Court.

We have been advised by SHA, that they propose to build West Watkins Mill Road to connect Clopper Road (Md. Rte. 117) with Watkins Mill Road and Frederick Road (Md. 355), over I-270 and the CSX tracks, in the vicinity of the Metropolitan Grove MARC rail station. The purpose of this letter is to identify for the State Highway Administration the impact that the plans will have on the above captioned property owned by ARE.

We have reviewed plans that show Access Option B, Metropolitan Court Extended, includes a roadway identified on the plans as Metropolitan Court, extending from West Watkins Mill Road to the Metropolitan Grove MARC Station. It is this alternate that most seriously impacts the subject property.

The building on Lot 17 consists of approximately 110,560 square feet, and is currently occupied by Digene, Inc. a company engaged in biotech research and development. ARE has submitted final plans to the Planning Commission for the development of a building consisting of approximately 202,200 square feet on Lot 19, and is in lease discussions with a prospective tenant.

ARE currently has a driveway which exists from West Watkins Mill Road, extending between Lot 17 and Lot 19. On either side of the driveway exists parking spaces used by both Lots 17 and 19. The location of the proposed Metropolitan Court is situated directly on top of the current driveway and

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Mr. Parker Williams, Administrator
January 16, 2001
Page 2

parking location, effectively reducing the number of valuable parking spaces available to both lots. Attached please find a copy of a plan indicating the location of the existing driveway and parking, with the proposed Metropolitan Court shown as an overlay.

ARE has concerns about a public roadway located in the middle of its property due to the sensitive nature of the research and development activities which take place on Lot 17 and which are proposed on Lot 19. A public road would be incompatible with the existing use of Lot 17. The prospective tenant for Lot 19 also would be unable to use the building and property if the public road was located as shown on Option B.

Tenants on the lots owned by ARE strongly oppose being situated on a public right of way because of the increased visibility and access to their property. ARE invests in and develops buildings specifically designed for research and development activities. These activities are by their nature extremely proprietary and confidential. ARE therefore invests in properties which are adequately screened and distanced from public roads, because their tenants cannot risk the public being in such close proximity to their buildings.

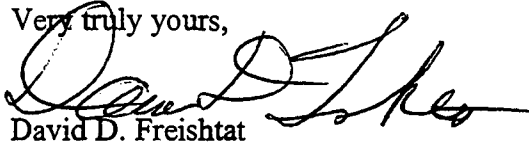
Also due to the highly sensitive nature of biotech research and development, the increased vibration resulting from automobile traffic will disrupt the activities in the buildings. For the above stated reasons, the adoption of Option B and the construction of a public roadway through the properties owned by ARE will preclude many possible tenants for these properties currently and in the future.

Additionally, any takings which may be required for the widening of West Watkins Mill Road easterly of Clopper Road (Md. Rte. 117) could have an equally negative impact on ARE's ability to lease its property in the area. Should the proposed widening result in the loss of any parking spaces, or if the main public thoroughfare encroaches closer to their facilities, ARE will experience a substantial loss in value to each of the lots located along West Watkins Mill Road.

We are aware that the purpose of the State Highway Administration is to increase transportation access to Gaithersburg area and the Metropolitan Grove Marc Station. However, there are many other options which would not impact existing and proposed business. As noted, the impact to the owner of these properties will certainly be devastating.

If you have any further questions or concerns, please do not hesitate to contact me.

Very truly yours,



David D. Freishtat

c: ARE-Metropolitan Grove I, LLC



Maryland Department of Transportation
State Highway Administration

320
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

February 2, 2001

Charles M. Fleischman, President
Digene Corporation
1201 Clopper Road
Gaithersburg MD 20878

Dear Mr. Fleischman:

Thank you for your recent letter regarding the project planning study at I-270 and Watkins Mill Road Extended. Your comments are appreciated and have been added to the public record.

The purpose of this study is to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Please also note that improving accessibility to the Metropolitan Grove MARC Station is an important consideration, but not the projects' main concern. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support designated economic development areas.

Traffic is a critical concern in the I-270 at Watkins Mill Road study. Traffic volumes are expected to increase over the next 20 years regardless of the outcome of this project, based on the projected growth and planned development within northern Gaithersburg. This project aims to find a transportation improvement that works within the existing environment to provide better accessibility, congestion relief, and a safer transportation network. The proposed "build" alternates improve traffic operations in the project area by reducing travel distances and travel times for I-270 traffic going to and from development areas, reducing the number of signalized intersections through which I-270 traffic must travel to reach those areas, and reducing traffic volumes at existing signalized intersections and ramps. As an aside to this study, Montgomery County and the City of Gaithersburg are considering various traffic calming measures, such as raised crosswalks, channelization, and signage, in order to reduce vehicle speeds and decrease cut-through traffic on residential streets within the project area.

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

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

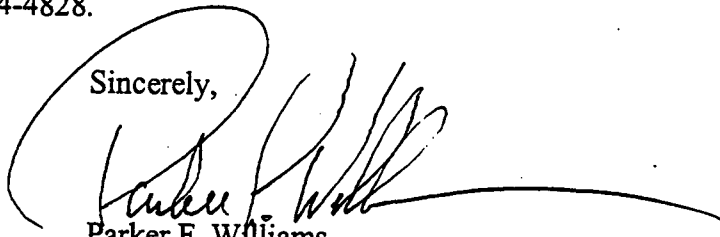
321

Mr. Charles M. Fleischman
Page Two

At this point, we are still receiving comments from the public (as a result of the public hearing held on January 16, 2001), and from the environmental regulatory agencies. Once all of this information is collected, and the impacts and benefits of each alternate have been assessed, the State Highway Administration (SHA) will select a preferred alternate. Since the public record for the transcript will close on February 16, 2001, we anticipate having a selected SHA alternate later this Spring. The SHA will then prepare a final environmental document for the preferred alternate and request approval of the document and preferred alternate from the Federal Highway Administration next Fall/Winter, 2001.

Thank you again for your interest in this study and for sharing your concerns on the Access Option B and the widening of West Watkins Mill Road. The study team will consider your comments. I trust that you will remain involved in this study and continue to offer comments as we progress. If you should have any questions, please feel free to call me or Mr. Douglas H. Simmons, our Director of Planning and Preliminary Engineering, who may be reached at 410-545-0411 or 1-888-204-4828.

Sincerely,



Parker F. Williams
Administrator

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

322

Mr. Charles M. Fleischman
Page Three

bcc: Ms. Anne Elrays, State Highway Administration (with incoming)
The Honorable Sidney Katz, Mayor, City of Gaithersburg
Mr. Mark Lotz, The Wilson T. Ballard Company (with incoming)
Mr. Neil Pedersen, Deputy Administrator, State Highway Administration
Ms. Cynthia D. Simpson, Deputy Director of Planning and Preliminary Engineering,
State Highway Administration
Mr. James L. Wynn, State Highway Administration



1201 Clapper Road
Gaithersburg, Maryland 20878
(301) 944-7000

323
January 12, 2001

Mr. Parker F. Williams, Administrator
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

Re: I-270 at Watkins Mills Road Extension Project

Dear Mr. Williams:

I am writing to you on behalf of Digene Corporation. We have been made aware that the State Highway Administration is proposing to modify West Watkins Mill Road to connect Clopper Road (Md. Rte. 117) with Watkins Mill Road and Frederick Road (Md. 355), over I-270 and the CSX tracks, in the vicinity of the Metropolitan Grove MARC rail station. The purpose of this letter is to communicate to the State Highway Administration the negative impact such plans will have on the property that we lease, and Digene's current and future business activities conducted on that property.

Digene currently leases approximately 111,000 square feet of space located at 1201 Clopper Road, Gaithersburg, Maryland also known as Lot #17 in the immediate area of West Watkins Mill Road and Metropolitan Court. We relocated to this site during calendar 2000 in order to expand our rapidly growing biomedical diagnostics business from several locations in Silver Spring and Beltsville, Maryland. Currently, we have over 150 employees at the new location. This is an increase of more than 20% in the past year, a trend we expect to continue in the foreseeable future. In the next several years, we expect to grow the company to several hundred employees producing several hundred million dollars of important biotechnology-based medical device and diagnostic products.

We have reviewed plans for Access Option B, Metropolitan Court Extended, which include a roadway identified as Metropolitan Court, extending from West Watkins Mill Road to the Metropolitan Grove MARC Station. Because this alternate seriously and adversely impacts the property we occupy as well as our current and future business opportunities, we wish to go on record with our formal objections to any adoption of Access Option B.

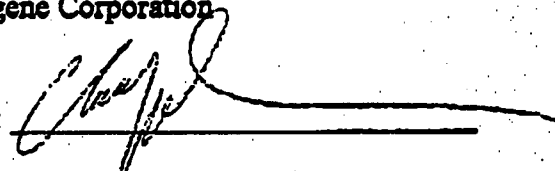
Our company is engaged in life science research, development, and manufacturing activities, which, by their nature, are extremely proprietary and confidential. Because there are a number of reasons we do not wish the public to be in close proximity to our buildings and operations, we specifically selected a property that is reasonably distant from public roads. As tenants located on Lot #17, we vehemently oppose Access Option B, which would place us directly on a busy public right of way.

Digene also selected the Clopper Road site because of the opportunity to expand the facility without the potential of moving out of the Gaithersburg area. Currently, Digene has the ability to remain at the current location by expanding the existing buildings, both to the north and to the east on the same plot of land. The State Highway Administration's taking of necessary parking spaces, combined with placing us squarely in a public thoroughfare, in effect destroys our ability to do business at this location and certainly forecloses expansion. Access Option B would eliminate the possibility of future expansion at the Clopper Road location and will force us to look for other locations, potentially outside the state of Maryland, for expansion opportunities or future relocation.

The proposed location of the access road under Option B would also eliminate over 30% of Digene's valuable usable employee parking spaces essential to successfully operating our business. In addition, given the already congested intersection at Clopper Road and West Watkins Mill Road, Digene's parking lot would by default become a connecting road placing our employees in harm's way. Similarly, any widening of West Watkins Mill Road eastward from Clopper Road (Md. Rte. 117) will have an equally negative impact on our business operations should the widening result in the loss of parking spaces, or if the main public thoroughfare encroaches closer to our facility.

We ask that the State Highway Administration consider the devastating impact Access Option B and the widening of West Watkins Mill Road would have on Digene's ability to conduct our regular business activities, and consider other alternatives which would not result in such adverse consequences for Digene Corporation and others in the area.

Digene Corporation

By: 

Charles M. Fleischman
President

c: Mr. Sidney Katz, Mayor
City of Gaithersburg



**Maryland Department of Transportation
State Highway Administration**

325
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

January 2, 2001

Mr. Peter Henry
BP Realty Investments, LLC
6723 Whittier Avenue
Suite 306C
McLean VA 22101

Dear Mr. Henry:

Thank you for your interest in the I-270 at Watkins Mill Road Extended study. We have received your letter regarding the alternates under consideration for this project planning study. Your comments are appreciated and have been added to the public record.

As you know, the purpose of this study is to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support designated economic development areas.

At this point, we are still awaiting comments from the public at the public hearing that has been rescheduled for January 16, 2001, as well as from the environmental regulatory agencies. Once all of this information is collected, including assessing the impacts and benefits of each alternate, the State Highway Administration (SHA) will select a preferred alternate. Since the public record for the transcript will close on February 16, 2001, we anticipate having a selected SHA alternate later this Spring, 2001. The SHA will then prepare a final environmental document for the preferred alternate and request approval of the document and preferred alternate from the Federal Highway Administration next Fall, 2001.

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

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Mr. Peter Henry
Page Two

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Again, thank you for your interest in this study and for sharing your support for further consideration of Alternates 2, 2A, and 3; the Mainline Eastern Shift option; and the Northbound Braided Ramps option. The study team will consider your comments, as well as your suggestion for an HOV connection to the east only at an extension of Metropolitan Grove Road. This may be further evaluated as part of this project or as part of the I-270/US 15 Multi-Modal Corridor Study. I hope that you remain involved in this study and continue to offer comments as we progress. If you should have any questions, please feel free to call me at 410-545-8547 or toll-free at 1-800-548-5026.

Very truly yours,

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

By: Michelle D. Hoffman
Michelle D. Hoffman
Project Manager
Project Planning Division

cc: Transcript (with incoming)
Ms. Anne Elrays, State Highway Administration (with incoming)
Mr. Mark Lotz, The Wilson T. Ballard Company (with incoming)
Mr. James L. Wynn, State Highway Administration

BP REALTY INVESTMENTS, LLC

December 18, 2000

Ms. Michelle Hoffman, Project Manager
Project Planning Division
Mail Stop C-301
State Highway Administration
Maryland Department of Transportation
707 N. Calvert Street
Baltimore, Maryland 21202

RE: Comment to proposed alternatives for I-270 Watkins Mill Road
Extended Planning Study

Dear Michelle;

Thanks to you and your group for having taken the time to visit with us and discuss the I-270/Watkins Mills planning study. As promised, we have completed the review of the various alternatives proposed. Since the Casey Parcels that we will be acquiring will be playing a very important role in the both the viability of the MARC station, the interchange and the future proposed town center, we have the following comments which we wish to be considered and included in the record.

The master plan for the City of Gaithersburg calls for a very high density "Town Center" to be built on the west side of I-270 basically located upon the Casey West parcel. This density would support the existing underutilized MARC station, the proposed Shady Grove/Clarksburg Transit way, as well as the I-270 interchange improvements at Watkins Mills Road that are the subject of your study.

Development of the contemplated density of the Town Center will support and will provide the important transit base necessary to justify such extensive public improvements. These transportation improvements will work to allow the Town Center to grow and to achieve an economic base while working to improve the existing community's quality of life and mitigate increases in traffic. This is the goal that can be achieved using a "smart growth" approach, for which both the City of Gaithersburg and the State of Maryland are recognized as national leaders. One of the City's planners captured this interdependence in stating that "...density supports transit, and makes transit viable."

Given this interdependence, we would have the following comments on the various options proposed:

Figure F - (Alternative 2) - Partial Cloverleaf interchange -- This proposed alternative approach would allow the Town Center to proceed and be developed.

Figure G - (Alternative 2a) - Partial Cloverleaf interchange with HOV -- This proposed alternative approach would allow the Town Center to proceed and be developed.

Figure H - (Alternative 3) - Full Diamond Interchange -- This proposed alternative approach would allow the Town Center to proceed and be developed. Since this alignment apparently has less environmental impact than that of Figures F or G, we have revised our plans to reflect Figure H, with a slight shift to the point of connection with Watkins Mills Road as previously discussed to avoid the requirements for multiple points of entrance and exits from the freeway off ramp and the Town Center. Please note that we have also added an HOV access point that avoids any streams and aligns with Metropolitan Grove Road in our revised plan, and would be willing to discuss aligning the HOV access internal to our site.

6723 Whittier Avenue, Suite 306C, McLean, Virginia 22101
(703) 848-8300 ♦ Fax (703) 848-8295

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Figure I - (Alternative 4) - Partial interchange -- In conversations with the City of Gaithersburg officials, the ability to develop the dense portion of the Town Center (that portion that would support the transit way and MARC station) will be conditioned upon the installation of the full interchange. This proposed partial interchange alternative is new and not in the current master plan. Accordingly, this approach of a partial interchange would not allow the Town Center to proceed and be developed.

Figure J - (Alternative 4A) - Partial interchange with HOV access -- For the same reasons as stated for Figure I, this approach of a partial interchange would not allow the Town Center to proceed and be developed.

Figure K - (Alternative 6) -- Watkins Mill Road Extended -- For the same reasons as stated for Figure I and J, this approach of a partial interchange would not allow the Town Center to proceed and be developed.

Figure L - (Alternative 6a) -- Watkins Mill with HOV access -- For the same reasons as stated for Figure I, J and K, this approach of a partial interchange would not allow the Town Center to proceed and be developed.

Figure M -- (Alternative 2) -- Western C-D shift with HOV access-- This design takes the minimal impact Figure G and adds HOV access directly at the proposed interchange. The addition of HOV access at this interchange creates several significant issues. First, there would be many more points of entrance and exit along Watkins Mill road -- four to service the HOV entrances and exits, four for the freeway on and off ramps, and two for the entrance and exit to the project. These would all be within 1,100 feet of each other, each attempting to merge onto or off of the new Watkins Mill road. These are many more movements that we see at the I-270/Falls Road interchange, and we believe would be confusing and difficult at best.

A second issue is the impact to the density of the proposed Town Center. As part of the desire to maintain a high quality of life, the City of Gaithersburg has determined that not less than half of the housing in new projects be detached, single family residential, including the Town Center. Again, this is not in the existing master plan (but is in a separate housing policy adopted by the City). This means that the high density portion of the Town Center is concentrated in a relatively small area. Unfortunately, the Figure M proposed alignment would eliminate a one half of the hotel space, more than 90% of office space, as well as the theater and most of the community's support retail, thus "gutting" much of the mixed-use character of the Town Center.

This would leave a Town Center of less than 140,000 square feet of office, which would not be viable to support the proposed transit way. However, the solution of providing HOV access at a point other than the proposed interchange does seem quite viable, and we have included one such possible alternative location in our revised plan since we would also like to see provision for HOV to the MARC station and Town Center as part of an overall transportation package.

Figure N-- Mainline Eastern Shift Option -- This proposed alternative approach would allow the Town Center to proceed and be developed.

Figure O - Northbound braided Ramps Option - This proposed alternative approach would allow the Town Center to proceed and be developed.

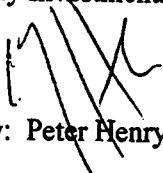
Access Options -- Figure C -- Access Option C calls for a large "New Carrolton" type of parking garage and dedicated transit facility. This approach has been proven to be the antithesis of the integrated approach of Traditional Neighborhood Design as is required under the City of Gaithersburg's master plan

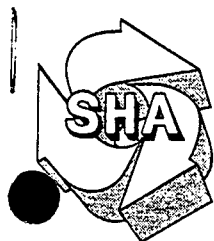
and ordinance for the development of the Casey West tract. This hostile approach to pedestrians will significantly damage the opportunity to build a cohesive Town Center.

Perhaps a better model for the Town Center than New Carrollton is Bethesda, where the homes come right up next to the higher density development, and the transportation facilities are weaved into the fabric of the entire project, thereby encouraging its use and pulling the community more tightly together. The revised plan for the Town Center accommodated the proposed parking facilities and transportation facilities, but in a more user friendly, "smart growth" way.

If there are any questions, please do not hesitate to call.

BP Realty Investments, LLC


By: Peter Henry



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

December 22, 2000

330

Ms. Lynne Rosenbusch
26517 Aiken Drive
Clarksburg MD 20871
Email: ljtandem@erols.com

Dear Ms. Rosenbusch:

Thank you for your interest in the project planning study at I-270 and Watkins Mill Road extended. We have received your email regarding this study. Your comments on the alternates are appreciated and will be incorporated into the public record for this study.

As you know, the purpose of this study is to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support designated economic development areas.

Thank you for providing your comments regarding marked bicycle lanes on Watkins Mill Road extended between MD 355 and MD 117. We have developed Watkins Mill Road extended to be a 27 or 39 foot roadway, depending on the alternate. This typical section allows for two 11-foot lanes with a 5-foot bicycle lane for a 27 foot roadway; and for a 39 foot roadway, this allows for a 12-foot outside lane and two 11-foot lanes with a 5-foot bicycle lane. This typical section would enable bicycle use, and the lane would be striped. The City and County call for the adjacent (8-10 foot) bikeway on the south side of Watkins Mill Road extended, and there will also be a pedestrian-oriented sidewalk on the north side of Watkins Mill Road extended. All of these measures will provide for safe and enhanced accessibility for pedestrians, recreational bicycles, and commuter bicycles.

We will be receiving comments from the public at the public hearing which has been rescheduled for January 16, 2001, as well as from the environmental regulatory agencies. Once all of this information is collected, including assessing the impacts and benefits of each alternate, the State Highway Administration (SHA) will select a preferred alternate. Since the public record for the transcript will close on February 16, 2001, we anticipate having a selected SHA alternate later this Spring, 2001. The SHA will consequently prepare a final environmental document for the selected alternate and request approval of the document from the Federal Highway Administration Fall, 2001.

My telephone number is _____

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

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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

VI C-57

Ms. Lynne Rosenbusch
Page Two

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Thank you again for your interest in this study and for bringing to our attention your important concerns. I hope that you remain involved in this study and continue to offer comments as we progress. If you should have any questions, please feel free to call me at 410-545-8547 or 1-800-548-5026.

Very truly yours,

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

By:

Michelle D. Hoffman
Michelle D. Hoffman
Project Manager
Project Planning Division

cc: Transcript (with incoming)
Ms. Anne Elrays, Environmental Manager, State Highway Administration
Mr. Harvey Muller, Bicycle Coordinator, State Highway Administration
Mr. James Wynn, Assistant Division Chief, State Highway Administration

From: NEIL PEDERSEN
To: "ljtandem@erols.com".GWIA.MDSHAHQ
Date: 12/18/00 8:21AM
Subject: Re: Watkins Mill Rd. Project

Ms. Rosenbusch,

Thank you for forwarding a copy of your comments that were addressed to Michelle Hoffman. We will consider them as we are making decisions on the project.

Neil Pedersen

CC: Harvey MULLER; MICHELLE HOFFMAN

333

From: Lynne Rosenbusch <ljtandem@erols.com>
To: <mhoffman@sha.state.md.us>
Date: 12/16/00 1:58PM
Subject: Watkins Mill Rd. Comments

26517 Aiken Dr.
Clarksburg, Md. 20871
Dec.15, 2000

State Highway Administration
Project Planning Division
707 N. Calvert St.
Baltimore, Md. 21202

Dear Ms. Hoffman:

Thank you for giving me this opportunity to comment on the Watkins Mill Rd. Extended project.

I wish to comment on the bike facility. I am an experienced adult cyclist who rides on the road. In fact most adult cyclists prefer to ride on the road. Due to the high volume of traffic predicted on this road, a stripped on road bike lane is preferable. This can be easily done by having the curb lane be 16' wide and stripping the lane 11' for cars and 5' for a shoulder.

Additionally a bike lane would also meet the requirements of the bike/ped access 2001 law requiring SHA to use best engineering practices.

The off road bikeway that you are proposing has been used on several roads in Germantown and has had numerous safety problems. For instance, the trail is 8 feet wide and this is not wide enough to accomodate multi users of the trail and bicyclists going both directions on the trail. Additionally turning cars don't yielding at intersections where the bike has the right of way. Also bicyclists attempting to cross the I-270 cloverleaf intersection can not cross safely due to the fact that cars are picking up speed as they approach the ramp. Finally off road bikeways collect glass and debris that does not get swept.

While the proposed off road bikeway seems to be the state highway standard for new roads, it would be innovative and progressive of SHA to design on road bike lanes for encouraging Gaithersburg residents to use their bicycles instead of a car for transportation. The Maryland Bicycle and Pedestrian Advisory Committee has been requesting bike lanes on other state highways in Prince Georges and Anne Arundel counties. Bike lanes on Watkins Mills Road would dove tail nicely with these other designs and show that the state can accomodate transportation bicyclists in Montgomery County. Additionally on road bike lanes can be thought of as a demonstration project in the I-270/US15 corridor.

In conclusion, I encourage the SHA to step out of the box and design a real on road bike facility.

Thank you for your time,

334

Lynne Rosenbusch
ljtandem@erols.com

cc:
Neil Pederson
Watkins Mill Team Members
Montgomery Co. Bicycle Action Group
Maryland Bicycle and Pedestrian Advisory Committee
Michael Jackson



**Maryland Department of Transportation
State Highway Administration**

December 22, 2000

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

335

Mr. Richard M. Floyd
700 North Frederick Avenue
Gaithersburg MD 20879
Email: richar.floyd@lmco.com

Dear Mr. Floyd:

Thank you for your interest in the project planning study at I-270 and Watkins Mill Road extended. We have received your email regarding this study. Your comments on the alternates are appreciated and will be incorporated into the public record for this study.

As you know, the purpose of this study is to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support designated economic development areas.

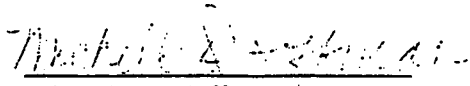
We will be receiving comments from the public at the public hearing, which has been rescheduled for January 16, 2001, as well as from the environmental regulatory agencies. Once all of this information is collected, including assessing the impacts and benefits of each alternate, the State Highway Administration (SHA) will select a preferred alternate. Since the public record for the transcript will close on February 16, 2001, we anticipate having a selected SHA alternate later this Spring, 2001. The SHA will then prepare a final environmental document for the selected alternate and request approval of the document from the Federal Highway Administration Fall, 2001.

Thank you again for your interest and participation in this study and for bringing to our attention your important concerns. I hope that you remain involved in this study and continue to offer comments as we progress. If you should have any questions, please feel free to call me at 410-545-8547 or 1-800-548-5026.

Very truly yours,

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

By:


Michelle D. Hoffman
Project Manager
Project Planning Division

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

VI C-62

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From: "Floyd, Richar" <richar.floyd@lmco.com>
To: "mhoffman@sha.state.md.us" <mhoffman@sha.state.md.us>
Date: 12/15/00 11:57AM
Subject: I270 Watkins Mill Road Extension

Lockheed Martin-Mission Systems of Gaithersburg would like to thank you very much for making us a part of this project and for providing us with copies of the proposed plans for the subject road study and for keeping us informed as they progress. We offer the following recommendation:

"After reviewing all the proposed options we feel that the "Western C-D Shift" is the best approach as it meets all the needs and will provide a minimal environmental impact. There were several others that meet the needs but would create severe to moderate impacts on the environment and were ruled out for these reasons."

Again thanks for including us in this study.

Sincerely,
Richard M. Floyd
ESH Program Manager
Lockhed Martin Mission Systems
Gaithersburg, Maryland

CC: "Kruse, Milt" <milt.kruse@lmco.com>, "Hoagland, Doug" <doug.hoagland@lmco.com>



**Maryland Department of Transportation
State Highway Administration**

December 21, 2000

337
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

Dr. Jonathan Balcombe
13518 Ansel Terrace
Germantown MD 20874
Email: pumilla@juno.com

Dear Dr. Balcombe:

Thank you for your interest in the project planning study at I-270 and Watkins Mill Road extended. We have received your email regarding this study. Your comments on the alternates are appreciated and will be incorporated into the public record for this study.

The purpose of this study is to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support designated economic development areas.

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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202
VT 6-644

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Dr. Jonathan Balcombe
Page Two

Thank you again for your interest in this study and for bringing to our attention your important concerns. I hope that you remain involved in this study and continue to offer comments as we progress. If you should have any questions, please feel free to call me at 410-545-8547 or 1-800-548-5026.

Very truly yours,

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

By:

Michelle D. Hoffman
Michelle D. Hoffman
Project Manager
Project Planning Division

cc: Transcript (with incoming)
Ms. Anne Elrays, Environmental Manager, State Highway Administration
Mr. Harvey Muller, Bicycle Coordinator, State Highway Administration
Mr. James Wynn, Assistant Division Chief, State Highway Administration

339

From: <pumilla@juno.com>
To: <mhoffman@sha.state.md.us>
Date: 12/21/00 11:16AM
Subject: cyclists and Watkins Mill Road Extension project

Michelle Hoffman, Project Manager

Dear Ms. Hoffman:

This brief note is to urge the inclusion of a clearly demarcated on-road bicycle lane on the Watkins Mill Rd. Extension project. Such a lane would provide optimal transportation for the growing number of cyclists and bicycle commuters in Montgomery County.

The off-road path currently being proposed, while certainly better than nothing (as was once so typical of road developments), is more dangerous for cyclists because they are harder to see by motorists. This past July, during my cycle commute home from work, I was knocked off my bicycle by a motorist who failed to yield to me at a stopsign. I was riding along the bikepath on Great Seneca Highway just south of Clopper Road (intersection with Dairymaid).

Thank you for your consideration, and for giving me this opportunity to comment on the Watkins Mill Rd. Extension project.

Sincerely,

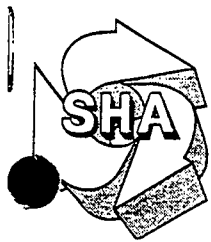
Jonathan Balcombe, Ph.D.
13518 Ansel Terrace
Germantown, MD 20874
301-916-2231
pumilla@juno.com

cc:

Neil Pedersen, Deputy Administrator for Planning and Engineering
Harvey Muller, SHA bicycle/ped coordinator
Micheal Jackson, MDOT Director of Bicycle/Ped affairs,
Eric Soter, City of Gaithersburg Planner
Jean Chait, Planner for Mont Co. DPWT
Charlie Watkins, District Engineer
Ki Kim, Transportation Coordinator, MNCPPC
Randy Madres, Md. Bike/Ped Committee

ZAPWORLD.COM - zap@zapworld.com
Zero Air Pollution vehicles ... where transportation is going.
<http://www.zapworld.com/cgi-bin/zap/af/b.cgi/194/>

CC: <npedersen@sha.state.md.us>, <hmuller@sha.state.md.us>,
<kim@mncppc.state.md.us>, <rmardres@juno.com>, <mjackson3@mdot.state.md.us>,
<esoter@ci.gaithersburg.md.us>, <jean.chait@co.mo.md.us>, <cwatkins@sha.state.md.us>



**Maryland Department of Transportation
State Highway Administration**

340
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

December 21, 2000

Mr. Alan Migdall
11736 Owens Glen Way
Gaithersburg MD 20878
Email: alan.migdall@eudoramail.com

Dear Mr. Migdall:

Thank you for your interest in the project planning study at I-270 and Watkins Mill Road extended. We have received your email regarding this study. Your comments on the alternates are appreciated and will be incorporated into the public record for this study.

The purpose of this study is to improve vehicular, pedestrian, and transit access to and from the transportation network in order to accommodate and provide sufficient capacity to serve economic development in the designated growth areas of northern Gaithersburg. Both the City of Gaithersburg and Montgomery County have prioritized this project in order to support designated economic development areas.

Thank you for providing your comments regarding marked bicycle lanes on Watkins Mill Road extended between MD 355 and MD 117. We have developed Watkins Mill Road extended to be a 27 or 39 foot roadway, depending on the alternate. This typical section allows for two 11-foot lanes with a 5-foot bicycle lane for a 27 foot roadway; for a 39 foot roadway, this allows for a 12-foot outside lane and two 11-foot lanes with a 5-foot bicycle lane. This typical section would enable bicycle use, and the lane would be striped. The City and County call for the adjacent (8-10 foot) bikeway on the south side of Watkins Mill Road extended, and there will also be a pedestrian-oriented sidewalk on the north side of Watkins Mill Road extended. All of these measures will provide for safe and enhanced accessibility for pedestrians, recreational bicycles, and commuter bicycles.

We will be receiving comments from the public at the public hearing, which has been rescheduled for January 16, 2001, as well as from the environmental regulatory agencies. Once all of this information is collected, including assessing the impacts and benefits of each alternate, the State Highway Administration (SHA) will select a preferred alternate. Since the public record for the transcript will close on February 16, 2001, we anticipate having a selected SHA alternate later this Spring, 2001. The SHA will consequently prepare a final environmental document for the selected alternate and request approval of the document from the Federal Highway Administration Fall, 2001.

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

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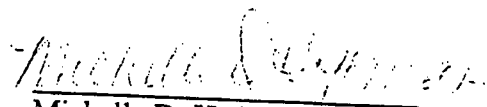
Mr. Alan Migdall
Page Two

Thank you again for your interest in this study and for bringing to our attention your important concerns. I hope that you remain involved in this study and continue to offer comments as we progress. If you should have any questions, please feel free to call me at 410-545-8547 or 1-800-548-5026.

Very truly yours,

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

By:



Michelle D. Hoffman
Project Manager
Project Planning Division

cc: Transcript (with incoming)
Ms. Anne Elrays, Environmental Manager, State Highway Administration
Mr. Harvey Muller, Bicycle Coordinator, State Highway Administration
Mr. James Wynn, Assistant Division Chief, State Highway Administration

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From: "Alan L Migdall" <alan.migdall@eudoramail.com>
To: <mhoffman@sha.state.md.us>
Date: 12/19/00 9:58PM
Subject: (No Subject)

11736 Owens Glen Way
Gaithersburg, MD 20878

Dec.18, 2000
State Highway Administration
Project Planning Division
707 N. Calvert St.
Baltimore, Md. 21202

Dear Ms. Hoffman:

I am a bicycle commuter and a member of the Gaithersburg City Bicycle Pedestrian Committee and the Montgomery County Bicycle Action Group and I have few comments on the Watkins Mill Rd. Extended project. I understand that this project calls for a 27 foot cross section for two travel lanes. I encourage you to stripe these lanes with due consideration to bicyclists. I propose simply that you stripe the lanes to include a right side shoulder, for example 11-11-5. This would be the ideal arrangement for encouraging cycling as a truly viable means of transportation. This dovetails with several of SHAs existing policies. This striping configuration provides what the SHA calls a recovery area for cars that enhances safety for motorists. I believe that Tom Hicks of SHA has supported this configuration in other projects. In addition the slightly narrowed travel lanes will provide a traffic calming effect to help keep car speeds from becoming excessive. This configuration would also fit with the legislative goals of the Bike/Ped 2000 and the Bike/Ped 2001 bills passed by the Maryland legislature to work to increase the number of trips by alternative means of transportation. I also note that this modification does not add more asphalt, so its additional cost should be negligible.

Please understand that the sidewalks or side paths along this road do not mitigate the need for on road bicycle accommodation. As current the AASHTO guide notes, there are differing skill levels of the cycling public - advanced, basic, and children. Basic cyclists and children tend to use the sidewalks and side paths for biking (as well as of course pedestrians), while the advanced cyclist uses the roads as they understand that the roads are typically safer than sidewalks for fast cycling. This is now becoming standard thinking and has been picked up in new planning documents such as the Gaithersburg City Master Plan of Bikeways. The existence of these differing skill levels requires both on road and side path accommodations, as there can be no advanced cyclists if there are no children and basic cyclists.

So in summary I ask that you stripe the lanes as 11, 11, and 5, and if possible label the curb lane as a bike lane. (I note that any width curb lane is helpful, even a 3 foot lane is better than nothing if 5 feet is for some reason not possible.)

Sincerely

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Alan Migdall

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D. STREAMLINED REGULATORY AGENCY COORDINATION

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Project Name & Limits: I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

Having reviewed the attached SHA Selected Alternative and Conceptual Mitigation concurrence/comment package and the summary presented above, the following agency (by signing this document):

☐ Federal Highway Administration	☐ Fish and Wildlife Service	☐ MD Dept. of Natural Resources
☐ Environmental Protection Agency	☐ National Park Service	☒ MD Dept. of the Environment
☐ Corps of Engineers	☐ National Marine Fisheries Service	

☒ Concurs (without comments) ☐ Concurs (w/ minor comments) ☐ Does Not Concur

Comments / Reasons for Non-Concurrence:

Note: Do not provide "conditional" concurrence. You should either concur with the information as provided (without comments or with minor comments) or not concur until revisions are made or additional information is provided.

☐ MD Historical Trust ☐ MD Department of Planning ☐ Metropolitan Planning Organization

☐ Provides Comments (below or attached) ☐ Has No Comments

Comments:

Additional Information Needed:

Signature: Elder A. Thigpen

Date: 11/7/01

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SHA'S SELECTED ALTERNATIVE AND CONCEPTUAL MITIGATION

Project Name & Limits: I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

Project Description:

The project involves a study of transportation access and mobility improvements to I-270 in the vicinity of the locally proposed extension of Watkins Mill Road between MD 355 and MD 117.

Project Purpose Statement:

The purpose of the project is to provide improved access (vehicular, pedestrian, bicycle, and transit) to and from the transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas (Priority Funding Areas) of northern Gaithersburg. In addition, it is important to improve access to the Metropolitan Grove MARC Station to facilitate increased transit use.

Purpose of Package:

The purpose of this package is to request concurrence on the Selected Alternate and Conceptual Mitigation plan for the project planning study at I-270 and Watkins Mill Road Extended.

SHA's Selected Alternate:

The SHA Selected Alternate is Alternate 3 Revised. This alternate consists of a full movement diamond configuration to minimize right-of-way impacts and allow flexibility in avoiding stream impacts. Revisions to Alternate 3 were undertaken subsequent to the Public Hearing to address public concerns, to provide compatibility with preliminary I-270/US 15 Study findings, to address US Army Corps of Engineers stream impact concerns and limit increases in costs and impacts. The revisions to Alternate 3 include providing:

- painted C-D lanes southbound (previously no southbound C-D was included with Alt. 3, only an additional southbound lane. It is noted that a barrier-separated C-D roadway remains part of this alternate in the northbound direction.)
- a mainline eastern shift of up to 19 feet in combination with a 675 LF retaining wall between the C-D lanes and the stream tributary to minimize the relocation of the stream tributary and utilities.
- a combination of retaining wall and stream relocation near the diverge point and bridge at the stream tributary crossing.

The SHA is recommending a revised Alternate 3 that includes a C-D lane system to provide consistency with the I-270/US 15 Multi-Modal Corridor Study. This alternate has no residential or business/commercial displacements and has lower right-of-way impacts than Alternate 2A or the C-D Western Shift Option. Alternate 3 Revised also affects a lower number of properties than the other full interchange alternates. In addition, Alternate 3 Revised has lower 100-year floodplain and wetlands impacts than the other full interchange alternates. In summary, Alternate 3 Revised is the least environmentally damaging practicable alternate that meets the project purpose and need.

The SHA recommends a full movement interchange concept at Watkins Mill Road Extended and I-270. A full movement interchange would maintain consistency with the City of Gaithersburg master plan and would provide the necessary traffic operation improvements that would decrease traffic volumes on the MD 124 and MD 117 interchanges with I-270. Alternate 3 Revised has the maximum extent of traffic operational benefits of all the build alternates.



**Maryland Department of Transportation
State Highway Administration**

June 29, 2001

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. Elder Ghigiarelli
Maryland Department of the Environment
Water Management Administration
Non-Tidal Wetlands and Waterways Division
2500 Broening Highway
Baltimore MD 21401

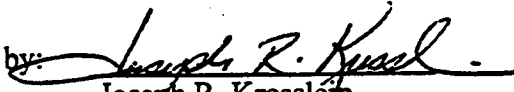
Dear Mr. Ghigiarelli:

In accordance with Maryland's Streamlined Environmental and Regulatory Process, the Maryland State Highway Administration (SHA) seeks your concurrence on the signature line below indicating your agreement with SHA's Selected Alternate and Mitigation for the I-270/Watkins Mill Road Extended project. SHA's Selected Alternate and Mitigation was presented at the Interagency Review meeting held on June 20, and is documented in the attached summary.

Please provide us with your concurrence by July 30, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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

by: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is VI D-1B

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

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Mr. Elder Ghigiarelli
I-270 at Watkins Mill Road Extended
Page Two

Please check one:

- ☐ Concur (without comments)
- ☐ Concur (comments attached)
- ☐ Do not concur (comments attached)

MDE

Date

CDS:AE
Attachment

cc: Mr. Jeremy Beck, SHA
Ms. Anne Elrays, SHA
Ms. Susie Jacobs, SHA
Mr. Mark Lotz, W. T. Ballard Co.
Ms. Gay Olsen, SHA
Ms. Cynthia Simpson, SHA
Mr. Jim Wynn, SHA



**Maryland Department of Transportation
State Highway Administration**

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

August 28, 2001

Mr. David T. Whitaker
Maryland Department of Planning
301 West Preston Street, Suite 1101
Baltimore MD 21201-2305

Dear Mr. Whitaker:

Thank you for your recent letter regarding the I-270/Watkins Mill Road Extended project planning study, as well as your consideration of Alternate 3 Revised as the State Highway Administration (SHA) Selected Alternate. Pedestrian, bicycle and transit access has been an important consideration in this study, and various measures to meet these needs have been incorporated into the Selected Alternate and/or will be facilitated by developer-constructed improvements.

The typical section for Watkins Mill Road Extended with the Selected Alternate (Alternate 3 Revised) includes 11-foot-wide through lanes with a five-foot-wide striped bicycle lane within the roadway. Beyond the curb, an eight-foot-wide bicycle/pedestrian trail will be included on one side of the roadway, and a five-foot-wide sidewalk will be provided on the other. The segments of Watkins Mill Road Extended outside of the proposed interchange area between MD 117 and MD 355 are proposed to be constructed by developers. Coordination is ongoing between SHA, the City of Gaithersburg planning staff and the developer to implement developer-constructed portions of Watkins Mill Road in a manner consistent with both the SHA Selected Alternate and the City of Gaithersburg guidelines for pedestrian/bicycle facilities.

The developer of the Parklands, which is being touted as transit-oriented development, is committed to constructing a direct access roadway from Watkins Mill Road, opposite the southbound I-270 exit ramp, into future parking lots/garages to support the existing MARC and future Corridor Cities Transitway stations. This access serves the same function as Access Options B and C, which were presented in the Environmental Assessment. Access Option B was dropped following the Public Hearing based on strong opposition from the West Watkins Mill Road business community, which objected to property and parking impacts that would have resulted. Separate from this project, the City of Gaithersburg is planning to implement a bicycle/pedestrian trail along the Access Option B alignment to connect from West Watkins Mill Road to the Metropolitan Grove MARC Station.

Descriptions of pedestrian/bicycle amenities and transit access improvements associated with the Selected Alternate and/or the adjacent developments will be included in the FONSI.

My telephone number is _____

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1-800-735-2258 Statewide Toll Free

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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

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Mr. David T. Whitaker
Page Two

Measures to promote safe bicycle and pedestrian crossings at proposed Watkins Mill Road crossings of I-270 ramps, MD 355 and MD 117, including appropriate sidewalk connections, will be developed during the final design stage in accordance with current AASHTO and SHA criteria and ADA standards.

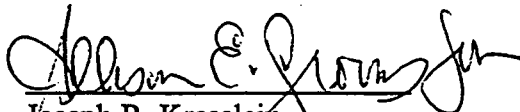
The I-270/Watkins Mill Road Extended project is funded for project planning only. Following Location and Design approvals, the project may become eligible to proceed into the final design stage when funding becomes available. For a project of this magnitude, the design usually takes 2 or 3 years to complete. Following the design stage, if funding is identified, right-of-way acquisition and construction could take place.

Thank you again for your letter. If you have any questions or need additional information, please call the Environmental Manager, Ms. Anne Elrays, at 410-545-8562, or the Project Manager, Mr. Mark Lotz, at 410-363-0150.

Very truly yours,

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

By:


Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

cc: Mr. Nelson Castellanos, Federal Highway Administration
Mr. Michael Day, Maryland Historical Trust
Mr. Ray Dintaman, Department of Natural Resources
Mr. Elder Ghigiarelli, Maryland Department of the Environment
Mr. Don Halligan, Maryland Department of Transportation
Ms. Fatimah Hasan, Maryland Department of Transportation
Ms. Barbara Rudnick, Environmental Protection Agency
Mr. Eric Soter, City of Gaithersburg
Mr. Paul Wettlaufer, Army Corps of Engineers
Mr. Jeremy Beck, State Highway Administration
Ms. Anne Elrays, State Highway Administration ✓
Ms. Gay Olsen, State Highway Administration

Mr. David T. Whitaker
Page Three

bcc: Mr. Joseph Kresslein, State Highway Administration
Mr. Mark Lotz, The Wilson T. Ballard Company
Ms. Cynthia D. Simpson, State Highway Administration



Maryland Department of Planning

Parris N. Glendening
Governor

Kathleen Kennedy Townsend
Lt. Governor

Harriet Tregoning
Secretary

Ronald N. Young
Deputy Secretary

August 3, 2001

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

Attention: Ms. Gay L. Olsen

**Re: SHA's Selected Alternate and Mitigation for the I-270/Watkins Mill Road
Extended Project**

Dear Ms. Simpson:

The Maryland Department of Planning has reviewed the information provided in the package of SHA's Selected Alternate and Mitigation for the I-270/Watkins Mill Road Extended Project. Overall, we support the SHA's selection of Alternate 3 Revised as the selected alternate for the I-270/Watkins Mill Road project. We believe that Alternate 3 Revised generally meets the Purpose and Need for the project. Alternate 3 is within the Montgomery County Priority Funding Area (PFA) and will support the mixed-use and transit-oriented developments proposed in the immediate area east and west of I-270. Through use of a full diamond interchange with I-270, Alternate 3 will help to reduce traffic congestion at key locations on local roadways. It will also provide improved transportation access to the Metropolitan MARC Station and a future Corridor Cities Transitway (CCT) Station.

Please note that improvements to pedestrian, bicycle and transit access have not been thoroughly addressed or documented in this project study. Pedestrian and bicycle movements, as well as transit access should be fully addressed to meet the stated Purpose of this project. We ask that you consider the following comments related to this issue:

As mentioned in the third paragraph of page 2, a modified version of Option C, a direct access from Watkins Mill Road Extended to the MARC/CCT Stations, would be included in the recommended alternate. The information is not found in the discussion of "Alternate Recommended by SHA" on page 4 and 5, and nor on the "Alternative 3 Revised Full Diamond Interchange" map. We believe that a direct connection from Watkins Mill Road Extended to the MARC and CCT Stations will greatly improve access and use of these transit Stations. Also, a direct access way to the MARC and CCT Stations should fully accommodate pedestrian and bicycle.

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travel. Information on pedestrian, bicycle, and transit access, including conceptual mapping, should be included in the Draft FEIS.

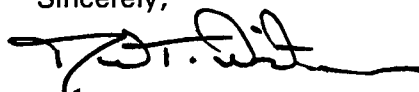
Designing pedestrian-friendly crossings of key intersections is a particularly important component of improving pedestrian movements and overall access to the MARC and CCT Stations. We are particularly concerned with the pedestrian unfriendly crossing designs shown at the intersection of Watkins Mill Road with MD 117 and at the intersection of Watkins Mill Road and MD 355 (i.e., Figure P). It appears that a portion of the median islands would be eliminated in order to facilitate vehicle-turning movements at these two major intersections. We strongly suggest that SHA review these two intersections at the detailed design stage and incorporate safe and effective pedestrian safety crossing features at both intersections to allow for pedestrian movements to and from the MARC and CCT Stations from the surrounding communities.

The project study should recommend safe pedestrian/bicycle crossings along Watkins Mill Road Extended east and west of I-270 to be integrated into future mixed-use and transit-oriented developments that are proposed in this area of Gaithersburg.

Are there existing sidewalks along MD 117 near the Watkins Mill Road intersection? If not, sidewalks should be included along with the intersection improvements at Watkins Mill Road and MD 117.

We greatly appreciate the opportunity to review and comment on this important project. Should you have any questions with regard to these comments, please do not hesitate to contact me at 410-767- 4564 or Bihui Xu at 410-767-4567.

Sincerely,



David T. Whitaker, AICP
Manager – Transportation
Planning Unit

cc: Nelson Castellanos, FHWA
Barbara Rudnick, EPA
Paul Wettlaufer, COE
Ray Dintaman, DNR
Attention: Greg Golden
Elder Ghigiarelli, MDE
Don Halligan, MDOT
Fatimah Hasan, MDOT
Michael Day, MHT
Attention: Ms. Ann Bruder
Ms. Beth Cole
Eric Soter, City of Gaithersburg



**Maryland Department of Transportation
State Highway Administration**

June 29, 2001

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

Re: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. David Whitaker, AICP
Principal Planner
Maryland Department of Planning
301 West Preston Street
Baltimore MD 21201

Attn: Ms. Bihui Xu

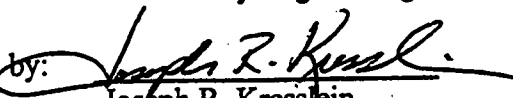
Dear Mr. Whitaker:

In accordance with Maryland's Streamlined Environmental and Regulatory Process, the Maryland State Highway Administration (SHA) seeks your comments on SHA's Selected Alternate and Mitigation for the I-270/Watkins Mill Road Extended project. SHA's Selected Alternate and Mitigation was presented at the Interagency Review meeting held on June 20, and is documented in the attached summary.

Please provide us with your comments by July 30, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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

by: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

Mr. David Whitaker
I-270 at Watkins Mill Road Extended
Page Two

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CDS:AE
Attachment

cc: Mr. Jeremy Beck, SHA
Ms. Anne Elrays, SHA
Ms. Susie Jacobs, SHA
Mr. Mark Lotz, W. T. Ballard Co.
Ms. Gay Olsen, SHA
Ms. Cynthia Simpson, SHA
Mr. Jim Wynn, SHA



**Maryland Department of Transportation
State Highway Administration**

August 14, 2001

Re: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

Mr. Ray Dintaman, Director
Environmental Review Unit
Maryland Department of Natural Resources
Tawes State Office Building, B-3
Annapolis MD 21401

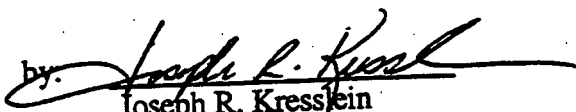
Dear Mr. Dintaman:

Thank you for your concurrence on July 30, and comments with the Maryland State Highway Administration (SHA) Selected Alternate and Mitigation for the I-270/Watkins Mill Road Extended project. You have indicated that because certain functions of a proposed stream relocation associated with Seneca Creek will be lost for a period of time, compensatory stream mitigation for the relocated stream would be required in some negotiated amount above and beyond the creation of the new stream channel. We believe that the minimal proposed stream relocation of approximately 175 linear feet will create a stable geomorphology within the historic floodplain that should regain its full ecological functions in a relatively short time frame. In addition, the stream reach to be abandoned exhibits a small radius of curvature in its meander, and steep eroding streambanks. Careful consideration of appropriate stream mitigation measures in accordance with permit requirements will be coordinated with your agency during final design.

Again, thank you for your comments and suggestions. We will continue to make every effort to minimize impacts to this important resource. Should you have any questions, please contact the environmental manager, Ms. Anne Elrays, at 410-545-8562 or the project manager, Mr. Mark Lotz, at 410-363-0150.

Very truly yours,

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

by: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

VI-D-10

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Mr. Ray Dintaman
I-270 at Watkins Mill Road Extended
Page Two

cc: Mr. Jeremy Beck, SHA
Mr. Steve Elinsky, USCOE
Ms. Anne Elrays, SHA
Mr. Elder Ghigiarelli, MDE
Ms. Susie Jacobs, SHA
Mr. Ron Kirby, MWCOG
Mr. J. Rodney Little, MHT
Mr. Mark Lotz, W. T. Ballard Co.
Ms. Gay Olsen, SHA
Mr. John Parsons, NPS
Ms. Barbara Rudnick, EPA
Ms. Cynthia D. Simpson, SHA
Ms. Denise Winslow, FHWA
Mr. Jim Wynn, SHA
Ms. Bihui Xu, MDP
Mr. Robert Zepp, FWS



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Parris N. Glendening
Governor

Kathleen Kennedy Townsend
Lt. Governor

Maryland Department of Natural Resources
ENVIRONMENTAL REVIEW

Tawes State Office Building
Annapolis, Maryland 21401

Sarah J. Taylor-Rogers, Ph.D.
Secretary

Stanley K. Arthur
Deputy Secretary

July 30, 2001

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

Dear Ms. Olsen:

This letter is in reply to Joseph Kresslein's letter of request, dated June 29, 2001, for Maryland Department of Natural Resources (DNR) concurrence with SHA's Selected Alternate and Mitigation for the I-270/Watkins Mill Road Extended project (Project No. MO839B11) in Montgomery County.

The Department participated in discussions of this project at the Interagency Meetings and attended field meetings at the project site. We concur with SHA's Selected Alternate and Conceptual Mitigation plan. We also offer the following comment on the Conceptual Mitigation plan:

In the Wetland and Section 4(f) Impact Mitigation section on page 6, the third paragraph references that preliminary proposed stream mitigation concepts include relocation in currently eroding areas using boulder armoring and vegetated overbanks. We caution that relocation of a stream channel which is ultimately for the purpose of filling the original natural channel should not be considered as fully mitigated, even if the new channel has improvements and stabilization measures added. Most of the new channel design measures are necessary requirements to provide for a stable channel with basic stream features. The improvements of the relocated channel should certainly be taken into consideration and partially credited, but there are many natural processes, functions, and values of natural streams which are fine-tuned to their exact historic location in the landscape, including their precise interactions with ground water and their provision of habitat for not only macro-biota but also micro-biota, that may be hard to quantify or even identify. A relocated channel may be designed to replicate a natural stream on the macro level, but technology is not available to identify or address most of the micro-level parameters. Because of this, certain processes, functions and values will be lost in a relocated stream, at least for some period of time. For this reason, we generally request that compensatory stream mitigation be required in some negotiated amount above and beyond the creation of the new stream channel. This is similar in concept to certain 2:1 and 3:1 vegetated wetland compensatory mitigation requirements, although we recommend that

VI D-12

Telephone: (410) 260-8330
DNR TTY for the Deaf: (410) 260-8835
Toll Free #: 1-877-620-8DNR

359
Gay Olsen
July 30, 2001
Page 2

individual site characteristics of stream relocations be carefully considered to factor in credit that can be given to any positive environmental features which are gained through the channel relocation process.

Note that this concurrence on Selected Alternate and Conceptual Mitigation as part of Maryland's Streamline Environmental and Regulatory Process does not fulfill or supersede Department review requirements regarding the use of DNR-owned property (Seneca State Park) for this project. The coordination regarding the use of these lands should continue with our Resource Planning unit (contact person: Arnold Norden, at 410-260-8406).

We advocate and support your continued efforts to optimize protection of natural resources during future planning and implementation phases for this project. If you have any questions concerning these comments, you may contact Greg Golden of my staff at 410-260-8334.

Sincerely,



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

cc: Arnold Norden, Resource Planning

360

Project Name & Limits: I-270 at Watkins Mill Road Extended Project Planning Study City of Gaithersburg, Montgomery County		
Having reviewed the attached SHA Selected Alternative and Conceptual Mitigation concurrence/comment package and the summary presented above, the following agency (by signing this document):		
☐ Federal Highway Administration ☐ Environmental Protection Agency ☐ Corps of Engineers	☐ Fish and Wildlife Service ☐ National Park Service ☐ National Marine Fisheries Service	☒ MD Dept. of Natural Resources ☐ MD Dept. of the Environment
☐ Concur (without comments) ☒ Concur (w/ <u>minor</u> comments) ☐ Does Not Concur		
Comments / Reasons for Non-Concurrence:		
<i>Note: Do <u>not</u> provide "conditional" concurrence. You should either concur with the information as provided (without comments or with <u>minor</u> comments) or not concur until revisions are made or additional information is provided.</i>		
☐ MD Historical Trust	☐ MD Department of Planning	☐ Metropolitan Planning Organization
☐ Provides Comments (below or attached) ☐ Has No Comments		
Comments:		
Additional Information Needed:		
Signature: <u>Ray C. Distenfeld</u>		Date: <u>7-30-01</u>



**Maryland Department of Transportation
State Highway Administration**

June 29, 2001

Re: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

Mr. Ray Dintaman, Director
Environmental Review Unit
Maryland Department of Natural Resources
Tawes State Office Building, B-3
Annapolis MD 21401

Dear Mr. Dintaman:

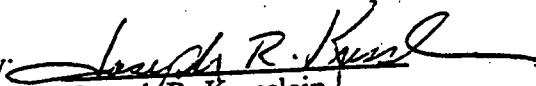
In accordance with Maryland's Streamlined Environmental and Regulatory Process, the Maryland State Highway Administration (SHA) seeks your concurrence on the signature line below indicating your agreement with SHA's Selected Alternate and Mitigation for the I-270/Watkins Mill Road Extended project. SHA's Selected Alternate and Mitigation was presented at the Interagency Review meeting held on June 20, and is documented in the attached summary.

Please provide us with your concurrence by July 30, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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

by:


Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

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
Baltimore, Maryland 21202

VI D-155

362

Mr. Ray Dintaman
I-270 at Watkins Mill Road Extended
Page Two

Please check one:

- ☐ Concur (without comments)
- ☒ Concur (comments attached)
- ☐ Do not concur (comments attached)

Ray C. Dintaman, Jr.
DNR

7-30-01
Date

CDS:AE
Attachment

cc: Mr. Jeremy Beck, SHA
Ms. Anne Elrays, SHA
Ms. Susie Jacobs, SHA
Mr. Mark Lotz, W. T. Ballard Co.
Ms. Gay Olsen, SHA
Ms. Cynthia Simpson, SHA
Mr. Jim Wynn, SHA



**Maryland Department of Transportation
State Highway Administration**

June 29, 2001

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

363

Re: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. Robert Zepp
U.S. Department of the Interior
Fish and Wildlife Service
Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis MD 21401

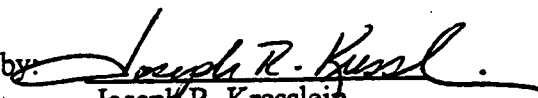
Dear Mr. Zepp:

In accordance with Maryland's Streamlined Environmental and Regulatory Process, the Maryland State Highway Administration (SHA) seeks your concurrence on the signature line below indicating your agreement with SHA's Selected Alternate and Mitigation for the I-270/Watkins Mill Road Extended project. SHA's Selected Alternate and Mitigation was presented at the Interagency Review meeting held on June 20, and is documented in the attached summary.

Please provide us with your concurrence by July 30, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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

by: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

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

VI D-17

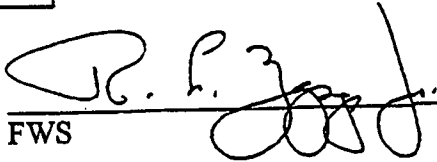
364

Mr. Robert Zepp
I-270 Watkins Mill Extended Project
Page Two

Please check one:

No Action

- ☒ ~~Concur (without comments)~~
- ☐ Concur (comments attached)
- ☐ Do not concur (comments attached)


FWS

8-7-01
Date

CDS:AE
Attachment

cc: Mr. Jeremy Beck, SHA
Ms. Anne Elrays, SHA
Ms. Susie Jacobs, SHA
Mr. Mark Lotz, W. T. Ballard Co.
Ms. Gay Olsen, SHA
Ms. Cynthia Simpson, SHA
Mr. Jim Wynn, SHA

To:

Anne
Elrays



**Maryland Department of Transportation
State Highway Administration**

June 29, 2001

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

Mr. John Parsons
National Park Service
1100 Ohio Drive
Room 220
SW Washington D.C. 20242

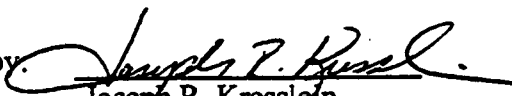
Dear Mr. Parsons:

In accordance with Maryland's Streamlined Environmental and Regulatory Process, the Maryland State Highway Administration (SHA) seeks your concurrence on the signature line below indicating your agreement with SHA's Selected Alternate and Mitigation for the I-270/Watkins Mill Road Extended project. SHA's Selected Alternate and Mitigation was presented at the Interagency Review meeting held on June 20, and is documented in the attached summary.

Please provide us with your concurrence by July 30, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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

by. 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

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

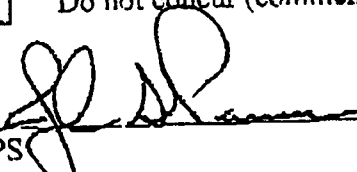
VI D-19

365

366

Mr. John Parsons
I-270 at Watkins Mill Road Extended
Page Two
Please check one:

- ☒ Concur (without comments)
☐ Concur (comments attached)
☐ Do not concur (comments attached)


NPS8/6/01
Date

CDS:AE
Attachment

cc: Mr. Jeremy Beck, SHA
Ms. Anne Elrays, SHA
Ms. Susie Jacobs, SILA
Mr. Mark Lotz, W. T. Ballard Co.
Ms. Gay Olsen, SHA
Ms. Cynthia Simpson, SHA
Mr. Jim Wynn, SHA



**Maryland Department of Transportation
State Highway Administration**

June 29, 2001

Re: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

367
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

Mr. J. Rodney Little
Office of Preservation Services
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

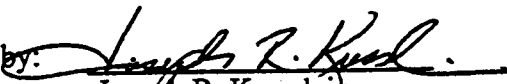
Dear Mr. Little:

In accordance with Maryland's Streamlined Environmental and Regulatory Process, the Maryland State Highway Administration (SHA) seeks your comments on SHA's Selected Alternate and Mitigation for the I-270/Watkins Mill Road Extended project. SHA's Selected Alternate and Mitigation was presented at the Interagency Review meeting held on June 20, and is documented in the attached summary.

Please provide us with your comments by July 30, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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

by: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

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

368

Mr. J. Rodney Little
I-270 at Watkins Mill Road Extended
Page Two

CDS:AE
Attachment

cc: Mr. Jeremy Beck, SHA
Ms. Anne Elrays, SHA
Ms. Susie Jacobs, SHA
Mr. Mark Lotz, W. T. Ballard Co.
Ms. Gay Olsen, SHA
Ms. Cynthia Simpson, SHA
Mr. Jim Wynn, SHA

369

Project Name & Limits: I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

Having reviewed the attached SHA Selected Alternative and Conceptual Mitigation concurrence/comment package and the summary presented above, the following agency (by signing this document):

☐ Federal Highway Administration ☐ Fish and Wildlife Service ☐ MD Dept. of Natural Resources
☐ Environmental Protection Agency ☐ National Park Service ☐ MD Dept. of the Environment
☐ Corps of Engineers ☐ National Marine Fisheries Service

☐ Concurs (without comments) ☐ Concurs (w/ minor comments) ☐ Does Not Concur

Comments / Reasons for Non-Concurrence:

Note: Do not provide "conditional" concurrence. You should either concur with the information as provided (without comments or with minor comments) or not concur until revisions are made or additional information is provided.

☒ MD Historical Trust ☐ MD Department of Planning ☐ Metropolitan Planning Organization

☐ Provides Comments (below or attached) ☒ Has No Comments

Comments:

Additional Information Needed:

Signature: *E. J. Cole*

Date: 7/20/2001



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

June 29, 2001

Re: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. Nelson J. Castellanos
Division Administrator
Federal Highway Administrator
The Rotunda-Suite 220
711 West 40th Street
Baltimore MD 21211

Attn: Ms. Denise Winslow

Dear Mr. Castellanos:

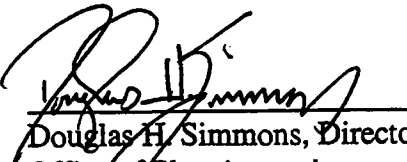
In accordance with Maryland's Streamlined Environmental and Regulatory Process, the Maryland State Highway Administration (SHA) seeks your concurrence on the signature line below indicating your agreement with SHA's Selected Alternate and Mitigation for the I-270/Watkins Mill Road Extended project. SHA's Selected Alternate and Mitigation was presented at the Interagency Review meeting held on June 20, and is documented in the attached summary.

Please provide us with your concurrence by July 30, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Sincerely,

Parker F. Williams
Administrator

by:


Douglas H. Simmons, Director
Office of Planning and
Preliminary Engineering

My telephone number is _____

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

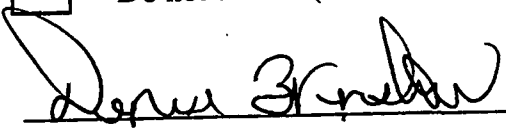
Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717
Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

371

Mr. Nelson J. Castellanos
I-270 Watkins Mill Extended Project
Page Two

Please check one:

- ☒ Concur (without comments)
☐ Concur (comments attached)
☐ Do not concur (comments attached)



FHWA

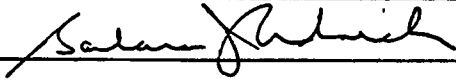
7/19/01
Date

CDS:AE
Attachment

cc: Mr. Jeremy Beck, SHA
Ms. Anne Elrays, SHA
Ms. Susie Jacobs, SHA
Mr. Mark Lotz, W. T. Ballard Co.
Ms. Gay Olsen, SHA
Ms. Cynthia Simpson, SHA
Mr. Jim Wynn, SHA

372

Environmental Protection Agency

Project Name & Limits: I-270 at Watkins Mill Road Extended Project Planning Study City of Gaithersburg, Montgomery County		
Having reviewed the attached SHA Selected Alternative and Conceptual Mitigation concurrence/comment package and the summary presented above, the following agency (by signing this document):		
☐ Federal Highway Administration	☐ Fish and Wildlife Service	☐ MD Dept. of Natural Resources
☒ Environmental Protection Agency	☐ National Park Service	☐ MD Dept. of the Environment
☐ Corps of Engineers	☐ National Marine Fisheries Service	
☒ Concurs (without comments) ☐ Concurs (w/ <u>minor</u> comments) ☐ Does Not Concur		
Comments / Reasons for Non-Concurrence:		
<i>Note: Do <u>not</u> provide "conditional" concurrence. You should either concur with the information as provided (without comments or with <u>minor</u> comments) or not concur until revisions are made or additional information is provided.</i>		
☐ MD Historical Trust	☐ MD Department of Planning	☐ Metropolitan Planning Organization
☐ Provides Comments (below or attached) ☐ Has No Comments		
Comments:		
Additional Information Needed:		
Signature: <u></u>		Date: <u>5/30/01</u>

373

U.S. Army Corps of Engineers

Project Name & Limits: I-270 at Watkins Mill Road Extended Project Planning Study City of Gaithersburg, Montgomery County		
Having reviewed the attached SHA Selected Alternative and Conceptual Mitigation concurrence/comment package and the summary presented above, the following agency (by signing this document):		
☐ Federal Highway Administration	☐ Fish and Wildlife Service	☐ MD Dept. of Natural Resources
☐ Environmental Protection Agency	☐ National Park Service	☐ MD Dept. of the Environment
☒ Corps of Engineers	☐ National Marine Fisheries Service	
☒ Concur (without comments) ☐ Concur (w/ <u>minor</u> comments) ☐ Does Not Concur		
Comments / Reasons for Non-Concurrence:		
<i>Note: Do <u>not</u> provide "conditional" concurrence. You should either concur with the information as provided (without comments or with <u>minor</u> comments) or not concur until revisions are made or additional information is provided.</i>		
☐ MD Historical Trust	☐ MD Department of Planning	☐ Metropolitan Planning Organization
☐ Provides Comments (below or attached) ☐ Has No Comments		
Comments:		
Additional Information Needed:		
Signature: <u>SM [Signature]</u>		Date: <u>5-21-01</u>



**Maryland Department of Transportation
State Highway Administration**

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

374

April 18, 2000

Mr. David Whitaker, AICP
Principal Planner
Maryland Office of Planning
301 West Preston Street
Baltimore MD 21202-2305

Dear Mr. Whitaker:

Thank you for your letter regarding the Alternates Retained for Detailed Study (ARDS) on the project planning study if I-270 and Watkins Mill Road Extended Study. In addition, we appreciate your review of the Planning Act Review Checklist for this project.

Throughout the Stage II detailed studies, we look forward to working with you and Bihui Xu of your staff as well as the other agency representatives, to refine the alternatives and learn more about traffic and environmental impacts. All of the pedestrian and bicycle improvements will be designed in accordance with both AASHTO and SHA standards. Enclosed, as you requested is the traffic information, showing the need for Watkins Mill Road Extended as four-lanes between MD 117 and I-270 and four lanes with two auxillary lanes, or a total of six lanes between I-270 and MD 355. Much of this need is derived from the development planned and approved on the east side of I-270. Please note that both the City of Gaithersburg and Montgomery County are imposing the need for developers to accommodate pedestrian and bicycle access within and to their developments. In addition, SHA will be working with the local jurisdictions, as part of this study to promote traffic calming, where appropriate in and around this study area.

Thank you again for your letter. If you have any questions, please feel free to contact Michelle Hoffman, the project manager, at 410-545-8547, or Anne Elrays, the Environmental Manager, at 410-545-8562. Both can be reached toll free at 1-800-548-5026.

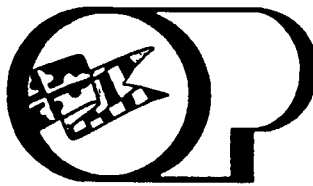
Very truly yours,

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

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



MARYLAND *Office of Planning*

Parris N. Glendening
Governor

Ronald M. Kreitner
Director

April 3, 2000

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

Attention: Ms. Gay L. Olsen

Re: I-270/Watkins Mill Road Extended Project;
Alternates Retained for Detailed Study

Dear Ms. Simpson:

This is in response to your request for OP's comments on the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended Project. We have reviewed the information provided in the Alternates Retained for Detailed Study package and the Planning Act Project Review Checklist completed by SHA and provide our comments as follows.

Smart Growth Areas Act Implications

The I-270/Watkins Mill Road Extended Project and its Alternates Retained for Detailed Study are located in a Montgomery County Priority Funding Area (PFA). OP has evaluated the County PFAs' designation and found it meets the criteria provided by the PFA law. When a preferred alternative is selected, Montgomery County would have to certify to SHA that it is located within a Priority Funding Area.

No Build Alternate

Under the No Build Alternate, transportation accessibility would not be improved to support planned development within the Priority Funding Areas in northern Gaithersburg since there is no provision of any major transportation facility improvements. Therefore, the No Build Alternate by virtue of it fails to meet the purpose and need of the project and would not be consistent with the Maryland Economic Growth, Resource Protection, and Planning Act of 1992 and the State's Smart Growth policy.

Alternate 6 - Option A, B & C

Alternate 6-A, B & C would provide the proposed Watkins Mill Road extension between MD 355 and MD 117 as well as transit station, HOV lane, and pedestrian/bicycle access improvements. Alternate 6-A, B & C, however, would not provide access to/from I-270 through

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the Watkins Mill Road extension, so that transportation accessibility in the northern Gaithersburg may not be improved to the extent that supports full development potential in the Priority Funding Areas. At this point, however, there is no sufficient information on how or whether transportation accessibility would be improved and how this alternate would fulfill the purpose and needs of the project. As stated in the Alternate Retained for Detailed Study package, SHA will further evaluate the effectiveness of the alternate at the detailed study stage. Upon receiving this information, we can then assess the consistency of Alternate 6-A, B & C with the Planning Act.

Alternate 2-A, B, & C and Alternate 3-B, & C

Both alternates would provide the Watkins Mill Road extension and a full interchange at Watkins Mill Road Extended / I-270, as well as transit station, HOV lane, and pedestrian/bicycle access options. Based on the traffic volume information provided in the Alternate Retained document, it seems that these two alternatives would provide better relief to traffic congestion on the area roadways, except on Watkins Mill Road, than the other build alternatives. Provision of direct access to/from I-270 through the Watkins Mill Road Extended would significantly improve accessibility to the Priority Funding Areas in northern Gaithersburg where development/redevelopment is planned. Provision of transportation facilities to support growth in PFAs is consistent with the intent of the Maryland Economic Growth, Resource Protection, and Planning Act of 1992. We note that both alternatives would have adverse environmental impacts. We also recognize that in coordination with resource and local agencies, SHA will continue to address strategies to minimize such impacts as the project study proceeds.

Alternate 4-A, B & C

Alternate 4-A, B & C would provide the Watkins Mill Road extension and a partial interchange at Watkins Mill Road Extended / I-270, as well as transit station, HOV lane, and pedestrian/bicycle access options. According to SHA, Alternate 4 - A, B & C does not fully meet the project purpose of improving accessibility in northern Gaithersburg since the proposed partial interchange at Watkins Mill Road Extended / I-270 would not provide access to/from I-270 south of Watkins Mill Road Extended. However, it is unclear how provision of a partial interchange would affect the development potential in the Priority Funding Areas. We expect that SHA will further the detailed study to clarify the effect of development potential in PFAs under Alternate 4-A, B & C.

Other Comments

We commend SHA's effort to accommodate pedestrian and bicycle facility improvements in the project. Under all build alternatives, pedestrian and bicycle access between east and west of I-270 and to/from transit stations would be improved. We assume that all proposed pedestrian and bicycle facilities would be built to meet the new AASHTO or SHA standards since such information has not been provided in the document for review.

We would like to have more information on the need for a 6-lane option for the proposed Watkins Mill Road extension. We are concerned that in a cumulative way, additional and widened highways could invite more automobile travel and less transit and other transportation mode usages. The 6-lane highway option could implicate a less pedestrian/bicycle friendly

377

environment for the areas it cuts through.

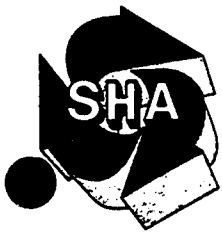
Should you have any questions regarding our comments, please do not hesitate to contact me or Bihui Xu at 410-767-4551.

Sincerely



David Whitaker, AICP
Principal Planner

cc: Ron Young, OP
Nelson Castellanos, FHWA
Attention: Pam Stephenson
Denise Rigney, EPA
Attention: Jamie Stark
Keith Harris, COE
Attention: CENB-OP-R, Paul Wettlaufer
Bob Pennington, USFWS
Timothy Goodger, NMFS
Attention: John Nichols
Jeffrey Knoedler, NPS
Ray Dintaman, DNR
Elder Ghigiarelli, MDE
Michael Day, MHT
Fatimah Hasan, MDOT



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

April 14, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
City of Gaithersburg
Montgomery County, Maryland

Mr. Paul R. Wettlaufer
Transportation Program Manager
U. S. Army Corps of Engineers
Baltimore District
CENAB-OP-RMN
P.O. Box 1715
Baltimore MD 21203-1715

Dear Mr. Wettlaufer:

Thank you for reviewing and providing comments on the Alternates Retained for Detailed Study (ARDS) package for the planning study at I-270 and Watkins Mill Road Extended and for attending the April 7th conflict resolution field review. The purpose of this letter is to address your comments on Alternate 2, Alternate 3, and Option C as discussed at the field review. Please also refer to the attached field review minutes.

Alternate 2

The study team will investigate the potential of an eastern shift of mainline I-270 in the vicinity of stations 125 through 130 for engineering and cost feasibility in order to avoid or minimize impacts to the adjacent wetlands as an option to Alternate 2. This shift will be evaluated incrementally from the current alignment to the 45-foot eastern shift of mainline I-270, which is Alternate 2-I.

Alternate 3

The study team will evaluate the possibility of beginning the exit ramp from southbound I-270 to MD 124 further south. However, as discussed at the field review the feasibility of this shift will be determined from traffic data, which mandates necessary ramp approach lengths for design and safety considerations. As discussed, initial review shows that it may not be possible to shift this ramp without substantial design exceptions.

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

VI: D-32

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Option C

Option C alone, or with dropped Alternate 3-I (i.e., no exit ramp from southbound I-270 to Watkins Mill Road Extended), would indeed overload the MD 124 interchange; however, this option is being evaluated as a component of the Alternatives. It is being evaluated to determine if Option C (in conjunction with any of these Alternates) could increase accessibility in the vicinity of the Metropolitan Grove Station without adversely impacting traffic and safety operations at the MD 124 interchange.

If you have any questions, please call Ms. Michelle Hoffman, the project manager at 410-545-8547, or Ms. Anne Elrays, the environmental manager at 410-545-8562. Michelle and Anne can be reached toll-free at 1-800-548-5026.

Very truly yours,

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

By:


Michelle D. Hoffman
Project Manager
Project Planning Division

Attachments

cc: Ms. Elizabeth Cole, MHT
Mr. Andrew Der, MDE
Mr. Ray Dintaman, DNR
Mr. Steve Elinsky, COE
Ms. Anne Elrays, SHA
Mr. Elder Ghigiarelli, MDE
Mr. Greg Golden, DNR
Mr. John Howard, NPS
Mr. Joseph Kresslein, SHA
Mr. Jeff Knoedler, NPS
Mr. Raymond Li, USFWS
Ms. Gay Olsen, SHA
Ms. Denise Rigney, EPA
Mr. Brian Smith, FHWA
Mr. Donald Sparklin, SHA
Ms. Jamie Stark, EPA
Ms. Pam Stephenson, FHWA
Mr. David Whitaker, MOP
Mr. James Wynn, SHA
Ms. Bihui Xu, MOP

380

I-270/Watkins Mill Road Extended – Project Planning Study – April 18, 2000
CONCURRENCE FORM FOR ALTERNATES RETAINED FOR DETAILED STUDY

Definition of Concurrence:

“Written determination by the agency that information to date is adequate and the agency agrees that the process can be advanced to the next stage. Agencies agree not to revisit the previous process steps unless conditions change.”

Project Description:

The project involves a study of transportation access and mobility improvements to I-270 in the vicinity of the locally proposed extension of Watkins Mill Road between MD 355 and MD 117.

Project Purpose Statement:

The purpose of the project is to provide improved access (vehicular, pedestrian, bicycle, and transit) to and from the transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas (Priority Funding Areas) of northern Gaithersburg. In addition, it is important to improve access to the Metropolitan Grove MARC Station to facilitate increased transit use.

Purpose of Package:

The purpose of this package is to request concurrence on the alternates retained for detailed study for the project planning study at I-270 and Watkins Mill Road.

Alternates Dropped Prior to the Alternates Public Workshop:

Three alternates were dropped at the August 26, 1999 Interagency Field Review, prior to the Alternates Public Workshop, due to structure costs, pavement issues, driver expectancy and natural environmental impacts. These alternates include the following:

- Left Hand Exit (dropped since it violated driver expectancy and contradicted the HOV system).
- Single Point Urban Diamond (dropped since it had a high structure cost, structure related impacts to the natural environment and contradicts driver expectancy).
- Double Decker (dropped since it added a lot of pavement and destroyed the wetland canopy).

Preliminary Alternates Evaluated:

Several alternates were evaluated in the preliminary planning phase. All of the alternates included the extension of Watkins Mill Road between MD 355 and MD 117 as either 4-lanes or 6-lanes and the potential of access options. The three access options include:

- *Option A – HOV Direct Access* from I-270 (inside lanes) to Watkins Mill Road (structure).
- *Option B – Metropolitan Court Extended* from the existing MARC Station to Watkins Mill Road, just west of the CSX tracks.
- *Option C – MD 124 Access Ramp* from southbound I-270 to the master planned Corridor Cities Transitway and a relocated MARC Station on the east side of CSX tracks.

The alternates considered included:

- Alternate 2 (Partial Cloverleaf Interchange – County Feasibility Study)
- Alternate 2-I (Partial Cloverleaf Interchange with Eastern Shift)
- Alternate 3 (Full Diamond Interchange)
- Alternate 3-I (3/4 Diamond Interchange) – Missing movement from southbound I-270 to Watkins Mill Road and MARC Station.
- Alternate 4 (Partial Interchange) – Movements only to/from the north.
- Alternate 5 (Full Diamond Interchange with Western Collector-Distributor Lane Shift)
- Baseline (Alternate 6 - Watkins Mill Road Extended between MD 355 and MD 117 with no interstate access, consistent with the Constrained Long Range Plan)

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Alternates Dropped Subsequent to the Alternates Public Workshop:

Several alternates were dropped as a results of the preliminary planning phase and public comments generated from the November 23, 1999 Alternates Public Workshop. These alternates were dropped since they did not adequately address the project's purpose and need in the most efficient way or were not the most environmentally sensitive transportation improvement. These alternates include:

- Alternate 2-I Options A, B & C (dropped since this alternate is functionally redundant to Alternate 2, providing little environmental relief with higher costs and right-of-way impacts.)
- Alternate 3 Option A (dropped since direct HOV access with this alternate is not geometrically and operationally feasible)
- Alternate 3-I Options A, B & C (dropped since this alternate is functionally redundant to Alternate 3, providing little environmental relief and missing a critical movement.)
- Alternate 5 Options A, B & C (dropped since this alternate is functionally redundant to Alternate 3, providing little environmental relief with higher costs and right-of-way impacts and isolating the wetlands.)

Alternates Retained for Detailed Study:

The following lists the alternates that we would like to carry into the more detailed planning analysis:

- No-Build Alternate
- Baseline CLRP (Alternate 6) - Options A, B & C (Watkins Mill Road Extended)
- Alternate 2 - Options A, B & C (Partial Cloverleaf Interchange)
- Alternate 3 - Options B & C (Full Diamond Interchange)
- Alternate 4 - Options A, B & C (Partial Interchange)

Having discussed the I-270 at Watkins Mill Road Extended alternates retained for detailed study presented above, the following agency (by signing this document):

☐ Federal Highway Administration	☐ National Park Service
☐ Environmental Protection Agency	☐ National Marine Fisheries Service
☒ Corps of Engineers	☐ MD Department of Natural Resources
☐ US Fish and Wildlife Service	☐ MD Department of the Environment

☐ Concurs (without comments) ☒ Concurs (with minor comments) ☐ Does Not Concur

Comments / Reasons for Non-Concurrence: Provided that an eastern shift of the I-270 mainline, and a western C-D road similar to Alt. 5, are analyzed as an avoidance/minimization measure during this study.

☐ MD Historical Trust	☐ Metropolitan Planning Organization
☐ MD Office of Planning	

☐ Provides Comments (below or attached) ☐ Has No Comments

Comments: _____

Additional Information Needed: _____

Signature: Paul W. [Signature] Date: 5/15/00



**Maryland Department of Transportation
State Highway Administration**

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

382

March 20, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
City of Gaithersburg
Montgomery County, Maryland

Mr. Paul R. Wettlaufer
Transportation Program Manager
U. S. Army Corps of Engineers
Baltimore District
CENAB-OP-RMN
P.O. Box 1715
Baltimore MD 21203-1715

Dear Mr. Wettlaufer:

Thank you for reviewing and providing comments on the Alternates Retained for Detailed Study (ARDS) package for the planning study at I-270 and Watkins Mill Road Extended. The purpose of this letter is to address your comments on Alternate 2, Alternate 3, and Option C.

Alternate 2

The study team will investigate the potential of an eastern shift of mainline I-270 in the vicinity of stations 125 through 130 for engineering and cost feasibility in order to avoid or minimize impacts to the adjacent wetlands. This shift will be evaluated incrementally from the current alignment to the 45-foot eastern shift of mainline I-270, which is Alternate 2-I.

Please recall, as a result of preliminary planning analysis and public comments generated from the November 23, 1999 Alternates Public Workshop, Alternate 2-I was dropped. Alternate 2-I was not carried forward because it did not adequately address the project's purpose and need in the most efficient way, and was redundant, geometrically and operationally, to Alternate 2. While Alternate 2-I has 0.2 acres of wetland impacts and approximately 700 LF of Waters of the US impacts less than Alternate 2, the cost (\$3 million +/-), difficulties associated with maintenance of traffic during construction and right-of-way required for a 45 foot mainline shift are impractical. In addition at the Alternates Public Workshop, public comments ~~from~~ were not in favor of this alternate due to the extensive right-of-way impacts.

My telephone number is _____

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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

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If you would like to sit down and discuss this issue further, it may be helpful. Please feel free to call me, or I will contact you once we have evaluated the effectiveness and magnitude this shift.

Alternate 3

The study team will evaluate the possibility of beginning the exit ramp from southbound I-270 to MD 124 further south. Feasibility of this shift will be determined from traffic data, which mandates necessary ramp approach lengths for design and safety considerations.

Option C

Option C alone, or with dropped Alternate 3-I (i.e., no exit ramp from southbound I-270 to Watkins Mill Road Extended), would indeed overload the MD 124 interchange; however, this option is being evaluated as a component of the Alternatives. It is being evaluated to determine if Option C (in conjunction with any of these Alternates) could increase accessibility in the vicinity of the Metropolitan Grove Station without adversely impacting traffic and safety operations at the MD 124 interchange.

If you have any questions, please call Ms. Michelle Hoffman, the project manager at 410-545-8547, or Ms. Anne Elrays, the environmental manager at 410-545-8562. Michelle and Anne can be reached toll-free at 1-800-548-5026.

Very truly yours,

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

By:

Michelle D. Hoffman
Michelle D. Hoffman
Project Manager
Project Planning Division

Attachments

cc: Ms. Elizabeth Cole, MHT
Mr. Andrew Der, MDE
Mr. Ray Dintaman, DNR
Mr. Steve Elinsky, COE
Ms. Anne Elrays, SHA
Mr. Elder Ghigiarelli, MDE
Mr. Greg Golden, DNR



DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS
P.O. BOX 1715
BALTIMORE, MD 21203-1715

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REPLY TO
ATTENTION OF

MAR 09 2000

Operations Division

Subject: CENAB-OP-RMN(MD SHA/I-270 @ WATKINS MILL ROAD
EXTENDED/ALTERNATIVES RETAINED)99-00838-12

Maryland State Highway Administration
Project Planning Division
Attn: Ms. Gay L. Olsen
707 North Calvert Street
Baltimore, Maryland 21202

Dear Ms. Olsen:

The Baltimore District of the U.S. Army Corps of Engineers (Corps) has reviewed the Alternatives Retained for Detailed Study package for the I-270/Watkins Mill Road Extended project and offers the following comments. The Corps concurs with the alternatives to be carried forward provided that SHA incorporate the following modifications to Alternatives 2 and 3.

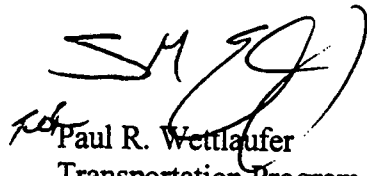
Alternative 2 – An eastern shift of I-270 should be incorporated into this alternative. The shift would serve to reduce the need for a stream relocation and a retaining wall in the vicinity of Stations 125 through 130 on I-270 thereby minimizing impacts to the aquatic environment that are associated with this alternative.

Alternative 3 – The beginning of the exit ramp from I-270 Southbound to the MD 124 interchange should be moved to the south. This would also serve to reduce the need for stream relocations and a retaining wall in the vicinity of Stations 125 through 130 on I-270.

Option C (any alternative) – This option utilizes the MD 124 interchange to provide access to the western portion of the development area from I-270 Southbound. The utilization of Option C in any alternative would reduce impacts to the aquatic environment while providing cost savings to SHA. This office has been informed in past discussions that the utilization of this option combined with any alternative is inadvisable due to projected overloading of the MD 124 interchange. Why is Option C still on the table?

If you have any questions concerning this matter, please contact Mr. Steve Elinsky of this office at 410.962.4503.

Sincerely,


Paul R. Wettlaufer
Transportation Program Manager

Copy Furnished:

Denise Rigney, EPA/Region 3
Pamela Stevenson, FHWA/Maryland Division
Bob Zepp, USFWS/CBFO
Greg Golden, DNR/ERU
Andy Der, MDE/WMA

SHA

**Maryland Department of Transportation
State Highway Administration**

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

386

February 8, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. Paul Wettlaufer
Transportation Program Manager
U.S. Army Corps of Engineers
Baltimore District
CENAB-OP-R
P.O. Box 1715
Baltimore MD 21201

Dear Mr. Wettlaufer:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended project. The Alternates Retained for Detailed study were presented at the January 19 Interagency Review meeting. Attached is a copy of the Alternates Retained for Detailed Study informational package, which has been updated since the Interagency presentation, as well as a summary statement for concurrence.

Please provide your concurrence on the Alternates Retained for Detailed Study summary statement by March 13, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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


Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

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

Mailing Address: P.O. Box 747 • Baltimore, MD 21203-0747
Street Address: 797 North Calvert Street • Baltimore, Maryland 21202



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Chesapeake Bay Field Office

177 Admiral Cochrane Drive

Annapolis, MD 21401



387

March 22, 2000

Ms. Cynthia Simpson
Deputy Director
Maryland State Highway Administration
Office of Planning and Preliminary Engineering
707 North Calvert St.
Baltimore, MD 21203-0717

Attn: Ms. Gay L. Olsen

Re: I-270 at Watkins Mill Road
Extended

Dear Ms. Simpson:

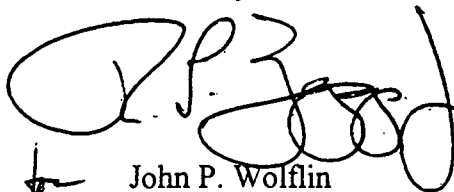
The U.S. Fish and Wildlife Service (Service) has reviewed the proposed Alternates Retained for Detailed Study for I-270/Watkins Mill Extended. The Service recommends retaining Alternates 2-I and 5, Options A, B & C for further study.

Alternate 2-I: Partial Cloverleaf Interchange with Eastern Shift has been proposed for abandonment due to the costs and ROW requirements associated with the eastern shift. However, total costs and ROW acquisition requirements would be comparable to other alternatives retained for further study. For instance, Alternate 2 would require 80-84 acres of acquisition (as compared to 67-72 acres for Alternate 2-I). Another issue concerning the eastern shift is the difficulties associated with maintenance of traffic during construction. The Service believes the temporary disruptions to traffic during construction is justified in the avoidance and minimization of impacts to natural resources, including the protection of 1000 linear feet of stream.

Although Alternate 5: Diamond Interchange with Western C-D Shift would require high levels of right-of-way acquisitions, the Service recommends retaining this alternate for further detailed analysis. The Service favors this alternate because impacts to natural resources are fully minimized, while providing a full access interchange to Watkins Mill Road.

The Service concurs with the elimination of Alternate 3, Option A and Alternate 3-I, Options A, B & C without comment. If you have any questions regarding our comments please contact Raymond Li of my staff at (410)573-4531.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'J. P. Wolflin'.

John P. Wolflin
Supervisor
Chesapeake Bay Field Office



**Maryland Department of Transportation
State Highway Administration**

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

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February 8, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. Robert Zepp
U.S. Department of the Interior
Fish and Wildlife Service
Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis MD 21401

Dear Mr. Zepp:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended project. The Alternates Retained for Detailed study were presented at the January 19 Interagency Review meeting. Attached is a copy of the Alternates Retained for Detailed Study informational package, which has been updated since the Interagency presentation, as well as a summary statement for concurrence.

Please provide your concurrence on the Alternates Retained for Detailed Study summary statement by March 13, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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


Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
1-800-735-2259, Statewide Toll Free

Mailing Address: P.O. Box 117, Baltimore, MD 21203-0117
Street Address: 707 North Calvert Street, Baltimore, Maryland 21202



390

Parris N. Glendening
Governor

Kathleen Kennedy Townsend
Lt. Governor

Maryland Department of Natural Resources

ENVIRONMENTAL REVIEW

Tawes State Office Building
Annapolis, Maryland 21401

Sarah J. Taylor-Rogers
Secretary

Stanley K. Arthur
Deputy Secretary

March 13, 2000

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

Dear Ms. Olsen:

This letter is in reply to Joseph Kresslein's letter of request, dated February 8, 2000, for Maryland Department of Natural Resources (DNR) concurrence with the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended Project (Project No. MO839B11), Montgomery County.

The Department participated in discussions of this project at the Interagency Meetings and at several site visits. The information provided in the recently submitted project package has been reviewed. The Department of Natural Resources concurs with the Alternates Retained for Detailed Study, with the following comments:

1. We support continued avoidance and minimization efforts to protect natural resources in the project Study Area. Because the tributary on the west side of I-270 has a quality forested riparian zone associated with it, a wildlife corridor and terrestrial habitat complex exists in this area. Minimization of forest vegetation loss is an important consideration. It appears that there are still opportunities to incorporate or consider design features and minor alignment shifts within the current Alternatives to minimize both terrestrial and aquatic resource impacts.
2. There is a reach of a tributary that is currently adjacent and parallel to southbound I-270. This stream reach remains relatively stable despite its very straight nature and confinement/loss of floodplain on the east bank. Efforts should be made to avoid further channelization or relocation of this stream reach as well as all other reaches of the stream.
3. We advocate minimization of tributary crossings for the project as feasible. Stream crossings should be made as close to perpendicular as possible and bridges should be considered for the necessary crossings to protect aquatic habitat.

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Gay Olsen
March 13, 2000
Page 2

As planning progresses, please continue to coordinate as necessary with Arnold Norden of our Resource Planning Unit (410-260-8406) regarding any potential impacts to DNR lands. Our review of wetland and waterway impacts through the Maryland Streamlined Environmental and Regulatory Process is a separate review and does not fulfill DNR's requirements to review impacts to DNR property.

If you have any questions concerning these comments, you may contact Greg Golden of my staff at 410-260-8334.

Sincerely,



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

SHA

**Maryland Department of Transportation
State Highway Administration**

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

392

February 8, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. Ray Dintaman, Director
Environmental Review Unit
Maryland Department of Natural Resources
Tawes State Office Building, B-3
Annapolis MD 21401

Dear Mr. Dintaman:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended project. The Alternates Retained for Detailed study were presented at the January 19 Interagency Review meeting. Attached is a copy of the Alternates Retained for Detailed Study informational package, which has been updated since the Interagency presentation, as well as a summary statement for concurrence.

Please provide your concurrence on the Alternates Retained for Detailed Study summary statement by March 13, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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


Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
1-800-335-2258 Statewide Toll Free

Mailing Address: P.O. Box 737 • Baltimore, MD 21203-0737
Street Address: 787 North Calvert Street • Baltimore, Maryland 21202



**Maryland Department of Transportation
State Highway Administration**

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

February 18, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Ms. Tanya K. Schmieler
Planning Supervisor
Maryland-National Capital Park and Planning Commission
Department of Parks
9500 Brunett Avenue
Silver Spring, MD 20901

Dear Ms. Schmieler:

The Maryland State Highway Administration is writing to request your comments on the attached Alternates Retained for Detailed Study informational package for the I-270/Watkins Mill Road Extended project. The Alternates Retained for Detailed Study were presented at the January 19 Interagency Review meeting. Please note that up to two acres of Middlebrook Hill Conservation Area adjacent to I-270 may be required with Alternate 2 Options A, B, and C and with Alternate 3 Options B and C.

Please provide your comments on the Alternates Retained for Detailed Study by March 20, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Sincerely,

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

by:


Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

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: 701 North Calvert Street, Baltimore, Maryland 21202



**Maryland Department of Transportation
State Highway Administration**

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

394

February 10, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. Nelson J. Castellanos, Jr.
Division Administrator
Federal Highway Administration
The Rotunda-Suite 220
711 West 40th Street
Baltimore MD 21211

Attn: Ms. Pamela Stephenson

Dear Mr. Castellanos:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended project. The Alternates Retained for Detailed Study were presented at the January 19 Interagency Review meeting. Attached is a copy of the Alternates Retained for Detailed Study informational package, which has been updated since the Interagency presentation, as well as a summary statement for concurrence.

Please provide your concurrence on the Alternates Retained for Detailed Study summary statement by March 6, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Sincerely,

Parker F. Williams
Administrator

by: Caroline D. Thompson
Neil J. Pedersen, Director
Office of Planning and
Preliminary Engineering

395

Alternates Dropped Subsequent to the Alternates Public Workshop:

Several alternates were dropped as a results of the preliminary planning phase and public comments generated from the November 23, 1999 Alternates Public Workshop. These alternates were dropped since they did not adequately address the project's purpose and need in the most efficient way or were not the most environmentally sensitive transportation improvement. These alternates include:

- Alternate 2-I Options A, B & C (dropped since this alternate is functionally redundant to Alternate 2, providing little environmental relief with higher costs and right-of-way impacts.)
- Alternate 3 Option A (dropped since direct HOV access with this alternate is not geometrically and operationally feasible)
- Alternate 3-I Options A, B & C (dropped since this alternate is functionally redundant to Alternate 3, providing little environmental relief and missing a critical movement.)
- Alternate 5 Options A, B & C (dropped since this alternate is functionally redundant to Alternate 3, providing little environmental relief with higher costs and right-of-way impacts and isolating the wetlands.)

Alternates Retained for Detailed Study:

The following lists the alternates that we would like to carry into the more detailed planning analysis:

- No-Build Alternate
- Baseline CLRP (Alternate 6) - Options A, B & C (Watkins Mill Road Extended)
- Alternate 2 - Options A, B & C (Partial Cloverleaf Interchange)
- Alternate 3 - Options B & C (Full Diamond Interchange)
- Alternate 4 - Options A, B & C (Partial Interchange)

Having discussed the I-270 at Watkins Mill Road Extended alternates retained for detailed study presented above, the following agency (by signing this document):

☒ Federal Highway Administration	☐ National Park Service
☐ Environmental Protection Agency	☐ National Marine Fisheries Service
☐ Corps of Engineers	☐ MD Department of Natural Resources
☐ US Fish and Wildlife Service	☐ MD Department of the Environment

☒ **Concurs (without comments)** ☐ **Concurs (with minor comments)** ☐ **Does Not Concur**

Comments / Reasons for Non-Concurrence: _____

☐ MD Historical Trust	☐ Metropolitan Planning Organization
☐ MD Office of Planning	

☐ **Provides Comments (below or attached)** ☐ **Has No Comments**

Comments: _____

Additional Information Needed: _____

Signature: *Lamela S. Stephenson* Date: *2/23/00*



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

391a

February 3, 2000

Re: Contract Number MO839B11
I-270 at Watkins Mill Road Extended
Alternates Retained for Detailed Study

Mr. Nelson J. Castellanos
Division Administrator
Federal Highway Administration
The Rotunda - Suite 220
711 West 40th Street
Baltimore MD 21211

Attn: Ms. Pamela Stephenson

Dear Mr. Castellanos:

This letter serves to address comments contained in your e-mail message dated January 18, 2000 to Ms. Michelle Hoffman regarding the Alternates Retained for Detailed Study (ARDS) package for the referenced project. Your comments were in reference to Alternate 4 and Alternate 6.

Alternate 4

The reasons for recommending that Alternate 4 not be retained for detailed study are primarily traffic-related, which calls into question whether this alternate can adequately address the purpose and need for this project of improving accessibility in northern Gaithersburg. Since this alternate is currently the only alternate, besides the No-Build (Alternate 1) and the Baseline (Alternate 6) Alternates, that provides avoidance of impacts to Section 4(f) resources (Great Seneca Park), we will carry this alternate forward for a more detailed analysis. In addition, I would like to provide the following traffic evaluations to better clarify why SHA has concerns with Alternate 4 addressing the project's purpose and need.

Traffic projections and analysis performed subsequent to initial drafts of the ARDS package reveal the following, as presented at the January 19, 2000 Interagency Meeting:

- Each of the ramps to be eliminated under Alternate 4 would carry 1,075 vehicles per hour (vph) during the AM Peak Period in 2020, were they provided. Most, if not all, of this traffic would divert to the I-270 interchanges with MD 124 and MD 117, thereby increasing congestion on MD 124, MD 117, and MD 355, which are projected to have failing level of service conditions in 2020. Specific traffic volume increases in the design year of 2020 with

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the partial access ramps (only to and from the north), as compared to alternates providing a full range of movements, are as follows:

1. The volume on the northbound I-270 ramp onto MD 124 would increase from 750 vph to 1,025 vph in the AM Peak Period and from 1,775 vph to 2,400 vph in the PM Peak Period.
 2. The volume on the westbound MD 124 ramp connecting to southbound I-270 would increase from 1,150 vph to 1,775 vph in the AM Peak Period and from 825 vph to 1,150 vph in the PM Peak Period.
 3. The volume on the eastbound MD 117 ramp to southbound I-270 would increase from 2,625 vph to 3,075 vph in the AM Peak Period and from 1,400 vph to 1,625 vph in the PM Peak Period.
 4. Average Daily Traffic (ADT) volumes on MD 124 would increase by approximately 10% east of I-270 and 20% west of I-270.
 5. ADT volumes on MD 117 would increase by 25% between MD 124 and I-270.
 6. ADT volumes on MD 355 would increase by 14% north of MD 124.
- As you can see, Alternate 4 will cause significant increases in vehicles per hour on the surrounding intersections and interchanges. This is largely due to the lack of full movements provided by Alternate 4.
 - Travel times could be significantly longer for motorists in the study area with Alternate 4, as compared to the full interchange alternates. For example, a motorist on northbound I-270 desiring to go to the planned development area on the east side of I-270 at Watkins Mill Road would need to travel 1.2 miles through heavy congestion at the I-270/MD 124 interchange and on MD 124 and MD 355, including four signalized intersections, rather than simply exit I-270 directly at Watkins Mill Road.
 - Therefore, this alternate does not fully address the purpose and need statement for the project to improve accessibility in northern Gaithersburg.
 - Elimination of these ramps also results in motorists exiting southbound I-270 at Watkins Mill Road not being able to directly reenter the southbound roadway, a condition generally discouraged by FHWA on Interstate interchanges.

We agree that the statement in the ARDS package that, "...this alternate does not provide any [environmental] improvements..." is not entirely correct. We believe it would be more accurate to say that environmental improvements offered by Alternate 4 do not likely offset the many traffic operational disadvantages that would result in comparison to the full interchange alternates. Furthermore, the volumes outlined above on various ramps and roadway segments with Alternate 4 would likely require additional lane(s) on at least some of those segments for satisfactory operations in 2020, beyond what would be required for the full interchange alternates. Therefore, pending detailed studies to analyze the need and develop plans for additional ramp and roadway widening, current assessments of costs and environmental impacts for Alternate 4 may be understated.

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Based on preliminary alternates analysis, it does appear that Alternate is 4 the only "build" alternate, other than Alternate 6, that avoids Section 4(f) impacts. However, we anticipate that, as required, a thorough analysis of Section 4(f) avoidance minimization on and mitigation measures will be undertaken during detailed studies for Alternates 2 and 3. One measure that will likely be considered is the braiding of the MD 124 entrance and Watkins Mill Road exit ramps on the northbound side of I-270. This would allow reduction or elimination of the northbound Collector-Distributor (C-D) road, at and north of, Watkins Mill Road, thereby allowing a shorter taper for the Watkins Mill Road ramp onto northbound I-270 and a reduced footprint across the Great Seneca Park (similar to that with Alternate 4). Traffic, right-of-way and environmental issues associated with this, or similar, Alternate 2/3 variation will be considered during detailed studies, as will further evaluations of Alternate 4.

Alternate 6

Alternate 6 reflects a "Baseline" condition (as modeled in the Metropolitan Washington Council of Government's (MWCOC) Regional Travel Demand Model for 2020) in the Constrained Long Range Plan for the Washington region. This alternate is a "no-build" for the traffic models since the extension of Watkins Mill Road between MD 355 and MD 117, which is included in the current version of both the Gaithersburg Area Master Plan and the City of Gaithersburg Master Plan, is programmed in the region's CLRP. This no-build or baseline scenario is not a "true" no-build like Alternate 1, because it does not represent current conditions and has not undergone environmental analyses or approvals. In addition, extension of Watkins Mill Road includes the consideration of Access Options A, B, and C, which would enhance HOV and transit mode accessibility. Furthermore, retention of Alternate 6 as the "Baseline" alternate in this study maintains consistency with terminology used in the overall I-270 Corridor Study. This Baseline Alternate is recommended for detailed studies, not only for comparison purposes, but also because it has strong public favor from Montgomery Village community representatives.

This alternate is included in the current local master plans, has the lowest environmental impact of the "build" alternates, and is favored by some local area residents. Therefore, this study would be remiss in not carrying Alternate 6 forward. In addition, traffic operations (level of service) at the intersections of the Watkins Mill Road tie-in points with MD 117 and MD 355 could be better with Alternate 6 since interstate access is not directly utilizing this locally extended roadway. Please note that while Alternate 6 could enhance traffic operations at these two intersections over "build" alternates, traffic congestion and delay could deteriorate in other parts of the study area. This will need to be more fully evaluated in the detailed study stage to ensure that this improvement would satisfy the purpose and need in achieving improved accessibility and mobility in northern Gaithersburg.

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Mr. Nelson J. Castellanos
I-270 at Watkins Mill Road Extended
Page 4

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If you have any questions, please feel free to contact me at 410-545-8547.

Sincerely,

Parker F. Williams
Administrator

By: Cynthia D. Simpson for
Neil J. Pedersen, Director
Office of Planning and
Preliminary Engineering



**Maryland Department of Transportation
State Highway Administration**

400
Parris N. Glendening
Governor
John D. Porcari
Secretary
Parker F. Williams
Administrator

February 8, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. Elder Ghigiarelli
Maryland Department of the Environment
Water Management Administration
Non-Tidal Wetlands and Waterways Division
2500 Broening Highway
Baltimore MD 21401

RECEIVED

FEB 11 2000

**WATER MANAGEMENT ADMIN.
WETLANDS & WATERWAYS PROGRAM**

Dear Mr. Ghigiarelli: *See Attached*

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended project. The Alternates Retained for Detailed study were presented at the January 19 Interagency Review meeting. Attached is a copy of the Alternates Retained for Detailed Study informational package, which has been updated since the Interagency presentation, as well as a summary statement for concurrence.

Please provide your concurrence on the Alternates Retained for Detailed Study summary statement by March 13, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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

by:

Joseph R. Kresslein
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

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E. H. [Signature]
421

I-270/Watkins Mill Road Extended - Project Planning Study - February 2, 2000
CONCURRENCE FORM FOR ALTERNATES RETAINED FOR DETAILED STUDY

Definition of Concurrence:

"Written determination by the agency that information to date is adequate and the agency agrees that the process can be advanced to the next stage. Agencies agree not to revisit the previous process steps unless conditions change."

Project Description:

The project involves a study of transportation access and mobility improvements to I-270 in the vicinity of the locally proposed extension of Watkins Mill Road between MD 355 and MD 117.

Project Purpose Statement:

The purpose of the project is to provide improved access (vehicular, pedestrian, bicycle, and transit) to and from the transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas (Priority Funding Areas) of northern Gaithersburg. In addition, it is important to improve access to the Metropolitan Grove MARC Station to facilitate increased transit use.

Purpose of Package:

The purpose of this package is to request concurrence on the alternates retained for detailed study for the project planning study at I-270 and Watkins Mill Road.

Alternates Dropped Prior to the Alternates Public Workshop:

Three alternates were dropped at the August 26, 1999 Interagency Field Review, prior to the Alternates Public Workshop, due to structure costs, pavement issues, driver expectancy and natural environmental impacts. These alternates include the following:

- Left Hand Exit (dropped since it violated driver expectancy and contradicted the HOV system).
- Single Point Urban Diamond (dropped since it had a high structure cost, structure related impacts to the natural environment and contradicts driver expectancy).
- Double Decker (dropped since it added a lot of pavement and destroyed the wetland canopy).

Preliminary Alternates Evaluated:

Several alternates were evaluated in the preliminary planning phase. All of the alternates included the extension of Watkins Mill Road between MD 355 and MD 117 as either 4-lanes or 6-lanes and the potential of access options. The three access options include:

- *Option A - HOV Direct Access* from I-270 (inside lanes) to Watkins Mill Road (structure).
- *Option B - Metropolitan Court Extended* from the existing MARC Station to Watkins Mill Road, just west of the CSX tracks.
- *Option C - MD 124 Access Ramp* from southbound I-270 to the master planned Corridor Cities Transitway and a relocated MARC Station on the east side of CSX tracks.

The alternates considered included:

- Alternate 2 (Partial Cloverleaf Interchange - County Feasibility Study)
- Alternate 2-I (Partial Cloverleaf Interchange with Eastern Shift)
- Alternate 3 (Full Diamond Interchange)
- Alternate 3-I (3/4 Diamond Interchange) - Missing movement from southbound I-270 to Watkins Mill Road and MARC Station.
- Alternate 4 (Partial Interchange) - Movements only to/from the north.
- Alternate 5 (Full Diamond Interchange with Western Collector-Distributor Lane Shift)
- Baseline (Alternate 6 - Watkins Mill Road Extended between MD 355 and MD 117 with no interstate access, consistent with the Constrained Long Range Plan)

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Alternates Dropped Subsequent to the Alternates Public Workshop:

Several alternates were dropped as a results of the preliminary planning phase and public comments generated from the November 23, 1999 Alternates Public Workshop. These alternates were dropped since they did not adequately address the project's purpose and need in the most efficient way or were not the most environmentally sensitive transportation improvement. These alternates include:

- Alternate 2-I Options A, B & C (dropped since this alternate is functionally redundant to Alternate 2, providing little environmental relief with higher costs and right-of-way impacts.)
- Alternate 3 Option A (dropped since direct HOV access with this alternate is not geometrically and operationally feasible)
- Alternate 3-I Options A, B & C (dropped since this alternate is functionally redundant to Alternate 3, providing little environmental relief and missing a critical movement.)
- Alternate 5 Options A, B & C (dropped since this alternate is functionally redundant to Alternate 3, providing little environmental relief with higher costs and right-of-way impacts and isolating the wetlands.)

Alternates Retained for Detailed Study:

The following lists the alternates that we would like to carry into the more detailed planning analysis:

- No-Build Alternate
- Baseline CLRP (Alternate 6) - Options A, B & C (Watkins Mill Road Extended)
- Alternate 2 - Options A, B & C (Partial Cloverleaf Interchange)
- Alternate 3 - Options B & C (Full Diamond Interchange)
- Alternate 4 - Options A, B & C (Partial Interchange)

Having discussed the I-270 at Watkins Mill Road Extended alternates retained for detailed study presented above, the following agency (by signing this document):

☐ Federal Highway Administration	☐ National Park Service
☐ Environmental Protection Agency	☐ National Marine Fisheries Service
☐ Corps of Engineers	☐ MD Department of Natural Resources
☐ US Fish and Wildlife Service	☒ MD Department of the Environment

☒ **Concurs (without comments)** ☐ **Concurs (with minor comments)** ☐ **Does Not Concur**

Comments / Reasons for Non-Concurrence: _____

☐ MD Historical Trust	☐ Metropolitan Planning Organization
☐ MD Office of Planning	

☐ **Provides Comments (below or attached)** ☐ **Has No Comments**

Comments: _____

Additional Information Needed: _____

Signature: Elder A. Higginbotham Date: 4/13/00

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**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

February 8, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Ms. Denise Rigney
NEPA Compliance Section
Environmental Protection Agency
Region III - 3ES30
1650 Arch Street
Philadelphia PA 19103-2029

Attn: Ms. Jamie Stark

Dear Ms. Rigney:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended project. The Alternates Retained for Detailed study were presented at the January 19 Interagency Review meeting. Attached is a copy of the Alternates Retained for Detailed Study informational package, which has been updated since the Interagency presentation, as well as a summary statement for concurrence.

Please provide your concurrence on the Alternates Retained for Detailed Study summary statement by March 13, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

Very truly yours,

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

by 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

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

410-209-5003 404
Attn: Anne Elrags

Alternates Dropped Subsequent to the Alternates Public Workshop:

Several alternates were dropped as a results of the preliminary planning phase and public comments generated from the November 23, 1999 Alternates Public Workshop. These alternates were dropped since they did not adequately address the project's purpose and need in the most efficient way or were not the most environmentally sensitive transportation improvement. These alternates include:

- Alternate 2-I Options A, B & C (dropped since this alternate is functionally redundant to Alternate 2, providing little environmental relief with higher costs and right-of-way impacts.)
- Alternate 3 Option A (dropped since direct HOV access with this alternate is not geometrically and operationally feasible)
- Alternate 3-I Options A, B & C (dropped since this alternate is functionally redundant to Alternate 3, providing little environmental relief and missing a critical movement.)
- Alternate 5 Options A, B & C (dropped since this alternate is functionally redundant to Alternate 3, providing little environmental relief with higher costs and right-of-way impacts and isolating the wetlands.)

Alternates Retained for Detailed Study:

The following lists the alternates that we would like to carry into the more detailed planning analysis:

- No-Build Alternate
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- Alternate 2 - Options A, B & C (Partial Cloverleaf Interchange)
- Alternate 3 - Options B & C (Full Diamond Interchange)
- Alternate 4 - Options A, B & C (Partial Interchange)

Having discussed the I-270 at Watkins Mill Road Extended alternates retained for detailed study presented above, the following agency (by signing this document):

☐ Federal Highway Administration
☒ Environmental Protection Agency
☐ Corps of Engineers
☐ US Fish and Wildlife Service

☐ National Park Service
☐ National Marine Fisheries Service
☐ MD Department of Natural Resources
☐ MD Department of the Environment

☒ Concur (without comments) ☐ Concur (with minor comments) ☐ Does Not Concur

Comments / Reasons for Non-Concurrence: _____

☐ MD Historical Trust
☐ MD Office of Planning

☐ Metropolitan Planning Organization

☐ Provides Comments (below or attached) ☐ Has No Comments

Comments: _____

Additional Information Needed: _____

Signature: _____

Date: 4/13/00



**Maryland Department of Transportation
State Highway Administration**

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

February 8, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. Ronald S. Kirby
Director of Department of Transportation Planning
Maryland Washington Council of Governments
777 N. Capital Street, N.E.
Suite 300
Washington D.C. 20002-4239

Dear Mr. Kirby:

In accordance with the merged Environmental/Regulatory process, the Maryland State Highway Administration requests your comments on the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended project. Attached is a copy of the Alternates Retained for Detailed Study informational package and summary statement for comments.

Please provide your comments on the Alternates Retained for Detailed Study summary statement by March 13, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

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

by: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

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

Mailing Address: P.O. Box 777, Baltimore, MD 21203-0777
Street Address: 307 North Calvert Street, Baltimore, Maryland 21202

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Alternates Dropped Subsequent to the Alternates Public Workshop:

Several alternates were dropped as a results of the preliminary planning phase and public comments generated from the November 23, 1999 Alternates Public Workshop. These alternates were dropped since they did not adequately address the project's purpose and need in the most efficient way or were not the most environmentally sensitive transportation improvement. These alternates include:

- Alternate 2-I Options A, B & C (dropped since this alternate is functionally redundant to Alternate 2, providing little environmental relief with higher costs and right-of-way impacts.)
- Alternate 3 Option A (dropped since direct HOV access with this alternate is not geometrically and operationally feasible)
- Alternate 3-I Options A, B & C (dropped since this alternate is functionally redundant to Alternate 3, providing little environmental relief and missing a critical movement.)
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The following lists the alternates that we would like to carry into the more detailed planning analysis:

- No-Build Alternate
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- Alternate 3 - Options B & C (Full Diamond Interchange)
- Alternate 4 - Options A, B & C (Partial Interchange)

Having discussed the I-270 at Watkins Mill Road Extended alternates retained for detailed study presented above, the following agency (by signing this document):

☐ Federal Highway Administration
☐ Environmental Protection Agency
☐ Corps of Engineers
☐ US Fish and Wildlife Service

☐ National Park Service
☐ National Marine Fisheries Service
☐ MD Department of Natural Resources
☐ MD Department of the Environment

☐ Concurs (without comments) ☐ Concurs (with minor comments) ☐ Does Not Concur

Comments / Reasons for Non-Concurrence: _____

☐ MD Historical Trust
☐ MD Office of Planning

☒ Metropolitan Planning Organization

☒ Provides Comments (below or attached) ☐ Has No Comments

Comments: Selection of alternates retained for detailed study should include
reference to region's policy goals, as adopted by the TPB
in October 1998.

Additional Information Needed: _____

Signature: _____

Date: 3/29/00



**Maryland Department of Transportation
State Highway Administration**

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

February 8, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. John Parsons
National Park Service
1100 Ohio Drive
Room 220
SW Washington D.C. 20242

Dear Mr. Parsons:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended project. The Alternates Retained for Detailed study were presented at the January 19 Interagency Review meeting. Attached is a copy of the Alternates Retained for Detailed Study informational package, which has been updated since the Interagency presentation, as well as a summary statement for concurrence.

Please provide your concurrence on the Alternates Retained for Detailed Study summary statement by March 13, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

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

Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

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

Mailing Address: P.O. Box 747, Baltimore, MD 21203-0747
Street Address: 707 North Calvert Street, Baltimore, Maryland 21202

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Alternates Dropped Subsequent to the Alternates Public Workshop:

Several alternates were dropped as a results of the preliminary planning phase and public comments generated from the November 23, 1999 Alternates Public Workshop. These alternates were dropped since they did not adequately address the project's purpose and need in the most efficient way or were not the most environmentally sensitive transportation improvement. These alternates include:

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Having discussed the I-270 at Watkins Mill Road Extended alternates retained for detailed study presented above, the following agency (by signing this document):

☐ Federal Highway Administration
☐ Environmental Protection Agency
☐ Corps of Engineers
☐ US Fish and Wildlife Service

☒ National Park Service
☐ National Marine Fisheries Service
☐ MD Department of Natural Resources
☐ MD Department of the Environment

☒ **Concurs (without comments)** ☐ **Concurs (with minor comments)** ☐ **Does Not Concur**

Comments / Reasons for Non-Concurrence: _____

☐ MD Historical Trust
☐ MD Office of Planning

☐ Metropolitan Planning Organization

☐ **Provides Comments (below or attached)** ☐ **Has No Comments**

Comments: _____

Additional Information Needed: _____

Signature: _____

Sara Cumenthal

Date: 3/6/00



**Maryland Department of Transportation
State Highway Administration**

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

February 8, 2000

RE: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County, MD

Mr. J. Rodney Little
Office of Preservation Services
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Mr. Little:

In accordance with the merged Environmental/Regulatory process, the Maryland State Highway Administration requests your comments on the Alternates Retained for Detailed Study for the I-270/Watkins Mill Road Extended project. The Alternates Retained for Detailed Study were presented at the January 19 Interagency Review meeting. Attached is a copy of the Alternates Retained for Detailed Study informational package, which has been updated since the Interagency presentation, as well as a summary statement for comments.

Please provide your comments on the Alternates Retained for Detailed Study summary statement by March 13, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph R. Kresslein at 410-545-8550.

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

Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
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Mailing Address: P.O. Box 747 Baltimore, MD 21203-0747
Street Address: 707 North Calvert Street Baltimore, Maryland 21202

Alternates Dropped Subsequent to the Alternates Public Workshop:

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- Alternate 4 - Options A, B & C (Partial Interchange)

Having discussed the I-270 at Watkins Mill Road Extended alternates retained for detailed study presented above, the following agency (by signing this document):

☐ Federal Highway Administration
☐ Environmental Protection Agency
☐ Corps of Engineers
☐ US Fish and Wildlife Service

☐ National Park Service
☐ National Marine Fisheries Service
☐ MD Department of Natural Resources
☐ MD Department of the Environment

☐ **Concurs (without comments)** ☐ **Concurs (with minor comments)** ☐ **Does Not Concur**

Comments / Reasons for Non-Concurrence: _____

☒ MD Historical Trust
☐ MD Office of Planning

☐ Metropolitan Planning Organization

☐ **Provides Comments (below or attached)** ☒ **Has No Comments**

Comments: *We look forward to completing the Section 106 process.*

Additional Information Needed: _____

Signature: *E. J. [unclear]*

Date: *2/17/2000*



**Maryland Department of Transportation
State Highway Administration**

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

July 23, 1999

Re: Project No. MO839B11
I-270 at Watkins Mill Road Extended
Montgomery County MD

Mr. John P. Wolflin
United States Department of the Interior
Fish and Wildlife Service
Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis MD 21401

Dear Mr. Wolflin:

The Maryland State Highway Administration (SHA) has received the Fish and Wildlife Service's concurrence with comments on the revisions to the Purpose and Need Statement for the I-270 at Watkins Mill Road Extended Project Planning Study, dated May 28, 1999. I would like to respond to the comments attached to your concurrence letter.

The SHA is aware of the sensitive nature of environmental resources of the Watkins Mill Road Extended study area and will seek to minimize potential impacts to streams, wetlands, and forested uplands within the Great Seneca Creek Watershed early in the Project Planning process. Measures we will investigate to reduce environmental impacts include spanning the wetlands with longer bridges and overpasses, as well as shifts in the alignment and footprint, as suggested by you and your staff. By utilizing bridge structures for crossings of sensitive areas, many of the concerns associated with wetland disturbance, such as crossing and fill, will be minimized. In addition, the use of structures should minimize the loss of riparian cover as well as reduce increases in the peak discharge.

During the design stage of this project, the SHA will evaluate the implementation of sediment traps and stormwater retention basins for any build alternative selected. Through the use of sediment traps during construction, the amount of sediment discharged into surrounding waters can be controlled so as to minimize effects to fish passages as well as to minimize induced sediment aggradation or degradation. Following construction, sediment traps can be converted into stormwater retention basins in order to reduce the impacts of a new roadway to the surrounding waters. Due to increased roadway cover, effects to rates of infiltration, percolation, interception, evaporation, transpiration and elevated levels of surface water are inevitable during a storm event, however, stormwater retention basins prove effective in minimizing such impacts. It will be necessary to complete more detailed engineering studies

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VI-D-651

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before locations for sediment traps and stormwater retention basins can be determined for optimum effectiveness.

The SHA is studying the crossing of Watkins Mill Road Extended in the location stipulated by the Montgomery County and City of Gaithersburg Master Plans. Your recommendation for a 250 foot northern shift in the alignment will be explored through the alternates scoping to determine its engineering viability. Approximately 2.3 million square feet of new office/research space and 1,500 residential units are also part of the City's Master Plan. Please note that this development will occur independent of the extension of Watkins Mill Road since the city approval is based on the Master Plan infrastructure. In addition, the Corridor Cities Transitway (CCT) Study, which is on both the Montgomery County and City of Gaithersburg Master Plans is a separate study being undertaken by the SHA and MTA. We will consider the transit alignment concerns in the I-270/US 15 Multi-Modal Corridor Study.

Please feel free to call Michelle Hoffman, the project manager, at 410-545-8547 or Anne Elrays, the environmental manager, at 410-545-8562 if you should have any questions. Both Ms. Hoffman and Ms. Elrays can also be reached toll-free within Maryland at 1-800-548-5026.

Very truly yours,

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

by: 
Joseph Kresslein
Assistant Division Chief
Project Planning Division

cc:

Ms. Elizabeth Cole, Maryland Historic Trust
Mr. Andrew Der, Maryland Department of the Environment
Mr. Steve Elinsky, US Army Corps of Engineers
Ms. Anne Elrays, Maryland State Highway Administration
Mr. Joe Finkle, Maryland State Highway Administration
Mr. Elder Ghigiarelli, Maryland Department of the Environment
Mr. Greg Golden, Maryland Department of Natural Resources
Ms. Michelle Hoffman, Maryland State Highway Administration
Ms. Susie Jacobs, Maryland State Highway Administration



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401



July 15, 1999

Ms. Cynthia Simpson
Deputy Director
Maryland State Highway Administration
Office of Planning and Preliminary Engineering
707 North Calvert St.
Baltimore, MD 21203-0717

Attn: Ms. Gay L. Olsen

Re: I-270 at Watkins Mill Road
Extended

Dear Ms. Simpson:

The U.S. Fish and Wildlife Service (Service) has reviewed the draft: "Purpose and Need Statement for the I-270 at Watkins Mill Road Extended" dated May 28, 1999, and we are providing concurrence. (enclosed). The proposed Watkins Mill Road Extended is located on the northern limits of the City of Gaithersburg. The alignment has been identified between MD 355 and MD 117, and runs approximately 1600 feet south of and parallel with the PEPCO power lines located on the southern periphery of Seneca Creek State Park. We would like to take this opportunity to provide early comments on impacts to fish and wildlife resources resulting from the proposed Watkins Mill Road Extended project. Impacts identified by the Service within this report have been categorized as *primary*, *secondary*, and *cumulative effects*.

Due to the region's close proximity and easy access to Washington D.C., the project area is highly urbanized. With the exception of lands protected in public parks (Seneca Creek State Park and Brown's Station Park), limited fish and wildlife habitats remain in the area. The proposed project is anticipated to result in impacts to numerous streams, wetlands, and forested uplands within the Great Seneca Creek watershed.

Primary Effects

The identified alignment will directly impact several streams and wetlands within the Great Seneca Creek (Use IV) watershed. Specifically, Watkins Mill Road Extended is anticipated to

cross two streams and disturb several wetland systems.

Located immediately west of I-270, an unnamed tributary of the Great Seneca Creek watershed will be impacted by the I-270/Watkins Mill Road interchange. Further west, an unnamed tributary of Great Seneca Creek will be crossed by Watkins Mill Road extended. These stream crossings could possibly result in barriers to fish passage and accelerated rates of erosion to banks and streambeds.

Impacts to area wetlands are also anticipated. Palustrine forested and scrub-shrub wetlands have been identified adjacent to the unnamed tributary along I-270. Disturbances to these wetlands such as crossings and fill, would destroy many of the functions associated with these critical landscapes including wildlife habitat, groundwater recharge and water quality enhancement. Disturbances to these wetlands are also expected to increase the severity of peak discharge and further augment the erosion of instream habitats.

To avoid these impacts, the Service recommends reducing stream and wetland crossings. Minimizing the footprint of Watkins Mill Road Extended may be accomplished through limitations of lane widths, and eliminating shoulders and medians. The Service also recommends shifting the I-270/Watkins Mill Road interchange 250 feet north, thereby reducing road-crossings over jurisdictional wetlands. To maintain these system's hydrological integrity, the Service encourages the use of expanded bridges and overpasses to protect wetlands and floodplains.

Secondary Effects

The conversion of forested upland habitats to impervious roadway surfaces resulting from the Watkins Mill Road Extended project will further increase the severity of peak discharge. The increased roadway cover will affect rates of infiltration, percolation, interception, evaporation and transpiration, and result in elevated levels of surface runoff during storm events.

Other concerns of the Service include losses of riparian cover. The benefits of riparian cover to wildlife resources have been well documented. Riparian areas buffer many of the pollutants entering waters, including sediments and roadway contaminants. Riparian vegetation also act to moderate water temperature, provide cover, and is a source of organic detrital matter and woody debris.

To avoid these impacts, the Service recommends the construction of a storm water management pond in uplands located within the stream's watershed. The design of the pond should specifically address the increased severity of peak discharges and act to filter sediments and contaminants from the waters. A forested buffer should be developed around the pond to compensate for upland habitats impacted by Watkins Mill Road Extended.

Cumulative Effects

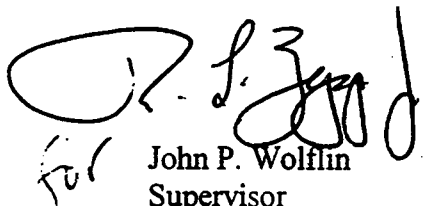
Limited development currently exists within Casey Tracts West and East. However, Watkins Mill Road Extended will facilitate a projected 2.3 million square feet of office/research space and 1,500 residential units. This conversion of forested uplands to impervious surfaces (rooftops, parking facilities, access roads, walkways) will eliminate the tract's remaining terrestrial habitats and significantly impact area streams and wetland resources.

Due to its down-gradient location and sources of hydrology, Great Seneca Creek will also exhibit increased rates of erosion and sedimentation. Increases in impervious cover, and disturbances to wetlands and streams located in the watershed will cumulatively increase peak flows and sediment transport. Particularly, increases in peak flows are expected to result in the erosion of creek banks and beds and generate elevated levels of sedimentation.

The designated alignment of the proposed Corridor Cities Transitway (CCT) is also anticipated to affect area resources. The CCT in conjunction with Watkins Mill Road extended has been identified as critical to the economic development of northern Gaithersburg. However, the designated alignment of the CCT would take Seneca Creek Park lands for highway construction. Located within the identified right-of-way is the mainstem of Great Seneca Creek and associated wetlands and floodplains; consequently, the development of the CCT could severely degrade aquatic and terrestrial habitats within the park.

Due to the highly urban environment and limited wildlife habitats remaining in the study area, the Service considers these impacts to be significant. We hope these impacts will be reduced as we develop alternatives in the next plan of this project. If you have any questions regarding our comments please contact Raymond Li of my staff at (410)573-4531.

Sincerely,



for

John P. Wolflin
Supervisor
Chesapeake Bay Field Office

Enclosure

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CONCURRENCE FORM FOR PROJECT PURPOSE AND NEED

I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

June 16, 1999

Definition of Concurrence:

"Written determination by the agency that information to date is adequate and the agency agrees that the process can be advanced to the next stage. Agencies agree not to revisit the previous process steps unless conditions change."

Project Description:

The project involves a study of transportation access and mobility improvements to I-270 in the vicinity of the locally proposed extension of Watkins Mill Road.

Project Purpose Statement:

The purpose of the project is to provide improved access (vehicular, pedestrian, bicycle, and transit) to and from the transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas (Priority Funding Areas) of northern Gaithersburg. In addition, it is important to improve access to the Metropolitan Grove MARC Station to facilitate increased transit use.

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- In 1997, I-270 in the study area experienced failing levels of service in the peak hours at the I-270/MD 124 interchange. Full development as proposed by the City of Gaithersburg and the Montgomery County governments would overload the existing local transportation network.

Request for Concurrence:

Having discussed the project purpose and needs presented above, the following agencies, by their signature to this document, signify concurrence with the I-270 at Watkins Mill Road Extended Project Planning Study Purpose and Need.

Concur as Presented ☒ Concur with Comments ☐ Do Not Concur ☐

Comments / Reasons for Non-Concurrence: _____

Additional Information Needed: _____

Signature: [Signature] Agency: USFWS Date: 7-15-99



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

June 25 1999

RE: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, MD
PDMS No. 151170

Mr. Robert Zepp
U.S. Department of the Interior
Fish and Wildlife Service
Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis MD 21401

Attn: Mr. David Sutherland

Dear Mr. Zepp:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Purpose and Need for the I-270/Watkins Mill Road Extended project. Attached is a copy of the Purpose and Need informational package and summary statement for concurrence.

Please provide your concurrence on the Purpose and Need summary statement by July 12, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph Kresslein at 410-545-8550.

Very truly yours,

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

By 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

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

Mailing Address: P.O. Box 747, Baltimore, MD 21203-0747
Street Address: 707 North Calvert Street, Baltimore, Maryland 21202



**Maryland Department of Transportation
State Highway Administration**

408
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

July 20, 1999

RE: I-270 @ Watkins Mill Road Extended

Ms. Christine Wells
Principal Planner
Maryland Office of Planning
301 W. Preston Street, Suite 1101
Baltimore MD 21201

Dear Ms. Wells:

Thank you for your coordination on the Maryland State Highway Administration (SHA) project planning study to improve access and mobility at I-270 and Watkins Mill Road Extended in Montgomery County, Maryland. As you know, this project is the SHA pilot project for environmental streamlining under the Transportation Equity Act for the 21st Century (TEA-21). The concurrence/summary sheet was one such strategy to investigate environmental streamlining for the development of this project.

I have received your signed concurrence form and thank you for a timely response with your concurrence and comments. In response to your comment, the SHA will update all of the figures drafted to date for the Purpose and Need Statement to reflect the correct location of the Metropolitan Grove MARC Station. These figures will be included in the environmental document.

The development of this project planning study includes an Alternates Public Workshop this Fall/Winter (1999/2000) and a Public Hearing tentatively scheduled for the Fall of 2000. The conclusion of this study is anticipated by the Winter/Spring of 2001, with the recommendation of a selected alternate and Location and Design approvals.

Thank you again for your coordination. If you have any questions, please feel free to call Michelle Hoffman, the project manager, at 410-545-8547 or Anne Elrays, the environmental manager, at 410-545-8562. Both Michelle and Anne can be reached at 1-800-548-5026.

Very truly yours,

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

By:

Michelle D. Hoffman
Project Manager
Project Planning Division

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



**Maryland Department of Transportation
State Highway Administration**

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

June 25, 1999

RE: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, MD
PDMS No. 151170

Ms. Christine Wells
Principal Planner
Maryland Office of Planning
PAND
301 West Preston Street
Baltimore MD 21201

Attn: Ms. Bihui Xu

Dear Ms. Wells:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Purpose and Need for the I-270/Watkins Mill Road Extended project. Attached is a copy of the Purpose and Need informational package and summary statement for concurrence.

Please provide your concurrence on the Purpose and Need summary statement by July 12, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph Kresslein at 410-545-8550.

Very truly yours,

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

By: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
1-800-735-2259 (Statewide TOLL Free)

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

420

CONCURRENCE FORM FOR PROJECT PURPOSE AND NEED

I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

June 16, 1999

Definition of Concurrence:

"Written determination by the agency that information to date is adequate and the agency agrees that the process can be advanced to the next stage. Agencies agree not to revisit the previous process steps unless conditions change."

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Project Needs:

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Request for Concurrence:

Having discussed the project purpose and needs presented above, the following agencies, by their signature to this document, signify concurrence with the I-270 at Watkins Mill Road Extended Project Planning Study Purpose and Need.

Concur as Presented _____ Concur with Comments ☒ Do Not Concur _____

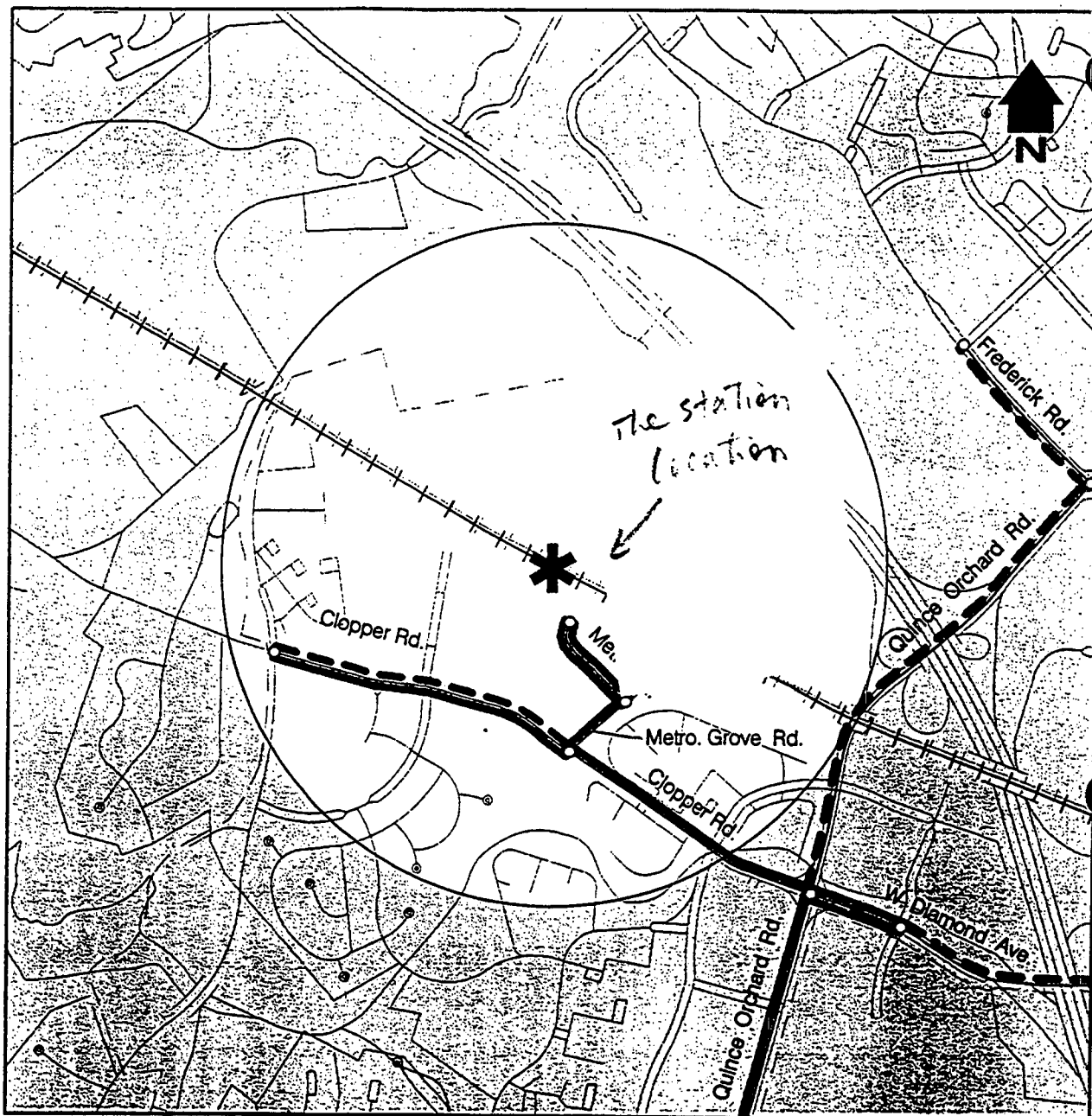
Comments / Reasons for Non-Concurrence: The correct location for the Metropolitan Grove MARC station must be shown on each figure in the Purpose + Need Information package.

Additional Information Needed: _____

Signature: Christine A Wells Agency: MD. Office of Planning Date: 7/8/99

Metropolitan Grove Station MARC Brunswick Line Pedestrian Access Routes

420



0.6 Mile Radius

0 750 1500 3000

Scale: 1" = 1500'

Base map source: MD State Highway
Administration, Grid Map Series.

LEGEND	
	Rail Station
	Adjacent Rail Station
	Inventory Route
	Route Segment End Points
	Rail Transit Line
	Pedestrian Accidents
	Sidewalk
	Partial Sidewalk



422

Parris N. Glendening
Governor

Kathleen Kennedy Townsend
Lt. Governor

Maryland Department of Natural Resources
ENVIRONMENTAL REVIEW

Tawes State Office Building
Annapolis, Maryland 21401

John R. Griffin
Secretary

Stanley K. Arthur
Deputy Secretary

July 15, 1999

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

Dear Ms. Olsen:

This letter is in reply to Joseph Kresslein's letter of request, dated June 25, 1999, for Maryland Department of Natural Resources (DNR) comments on the Purpose and Need Statement for Project No. MO839A11, I-270 at Watkins Mill Road Extended, Montgomery County; PDMS No. 151170.

The Department has been participating in discussions of this project at the monthly Interagency Meetings and at the field meeting. Following the recent discussion of certain items within the Statement and minor changes made as a result of these discussions, we have no comments on the Purpose and Need Statement. In the upcoming review phases, we will advocate optimized protection of the natural resources located in the vicinity of the project study area.

If you have any questions concerning these comments, you may contact Greg Golden of my staff at 410-260-8334.

Sincerely,

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

72

CONCURRENCE FORM FOR PROJECT PURPOSE AND NEED

I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

June 16, 1999

Definition of Concurrence:

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Request for Concurrence:

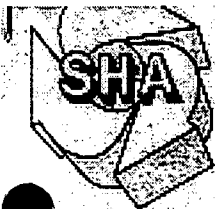
Having discussed the project purpose and needs presented above, the following agencies, by their signature to this document, signify concurrence with the I-270 at Watkins Mill Road Extended Project Planning Study Purpose and Need.

Concur as Presented ☒ Concur with Comments ☐ Do Not Concur ☐

Comments / Reasons for Non-Concurrence: _____

Additional Information Needed: _____

Signature: Ray C. Distamen Agency: Department of Natural Resources Date: 7-15-99



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

June 25, 1999

RE: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, MD
PDMS No. 151170

Mr. Ray Dintaman, Director
Environmental Review Unit
Maryland Department of Natural Resources
Tawes State Office Building, B-3
Annapolis MD 21401

Dear Mr. Dintaman:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your comments on the Purpose and Need for the I-270/Watkins Mill Road Extended project. Attached is a copy of the Purpose and Need informational package and summary statement.

Please provide your comments on the Purpose and Need by July 12, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph Kresslein at 410-545-8550.

Very truly yours,

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

By: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

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: 107 North Calvert Street • Baltimore, Maryland 21202



Maryland Department of Transportation
State Highway Administration

✓
Parris N. Glendening 425
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

June 28, 1999

RE: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, MD
PDMS No. 151170

Mr. Nelson J. Catellanos
Division Administrator
Federal Highway Administration
The Rotunda-Suite 220
711 West 40th Street
Baltimore MD 21211

Attn: Ms. Pamela Stephenson

Dear Mr. Castellanos:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Purpose and Need for the I-270/Watkins Mill Road Extended project. Attached is a copy of the Purpose and Need informational package and the summary statement for your concurrence.

Please provide your concurrence on the Purpose and Need summary statement by July 12, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph Kresslein at 410-545-8550.

Sincerely,

Parker F. Williams
Administrator

By:


Neil J. Pedersen, Director
Office of Planning and
Preliminary Engineering

My telephone number is 1-888-204-4828

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

VI D-79
VI D-79

CONCURRENCE FORM FOR PROJECT PURPOSE AND NEED

426

I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

June 16, 1999

Definition of Concurrence:

"Written determination by the agency that information to date is adequate and the agency agrees that the process can be advanced to the next stage. Agencies agree not to revisit the previous process steps unless conditions change."

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Request for Concurrence:

Having discussed the project purpose and needs presented above, the following agencies, by their signature to this document, signify concurrence with the I-270 at Watkins Mill Road Extended Project Planning Study Purpose and Need.

Concur as Presented ☒ Concur with Comments _____ Do Not Concur _____

Comments / Reasons for Non-Concurrence: _____

Additional Information Needed: _____

Signature: Pamela S. Stephenson Agency: Federal Highway Administration Date: 7/8/99



**Maryland Department of Transportation
State Highway Administration**

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

June 25 1999

RE: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, MD
PDMS No. 151170

Ms. Denise Rigney
NEPA Compliance Section
Environmental Protection Agency
Region III - 3ES30
1650 Arch Street
Philadelphia PA 19103-2029

Dear Ms. Rigney:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Purpose and Need for the I-270/Watkins Mill Road Extended project. Attached is a copy of the Purpose and Need informational package and summary statement for concurrence.

Please provide your concurrence on the Purpose and Need summary statement by July 12, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph Kresslein at 410-545-8550.

Very truly yours,

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

By: Joseph R. Kresslein
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

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

428

CONCURRENCE FORM FOR PROJECT PURPOSE AND NEED

I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

June 16, 1999

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Request for Concurrence:

Having discussed the project purpose and needs presented above, the following agencies, by their signature to this document, signify concurrence with the I-270 at Watkins Mill Road Extended Project Planning Study Purpose and Need.

Concur as Presented _____ Concur with Comments _____ Do Not Concur _____

Comments / Reasons for Non-Concurrence:

We also concur with logical termini and independent
utility of this project

Additional Information Needed:

Signature: James G. Hart Agency: EPA Date: 7/13/99



**Maryland Department of Transportation
State Highway Administration**

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

June 25, 1999

RE: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, MD
PDMS No. 151170

Mr. Elder Ghigiarelli
Maryland Department of the Environment
Water Management Administration
Non-Tidal Wetlands and Waterways Division
2500 Broening Highway
Baltimore MD 21401

Dear Mr. Ghigiarelli:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your comments on the Purpose and Need for the I-270/Watkins Mill Road Extended project. Attached is a copy of the Purpose and Need informational package and summary statement.

Please provide your comments on the Purpose and Need by July 12, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph Kresslein at 410-545-8550.

Very truly yours,

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

By: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

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

Mailing Address: P.O. Box 3717, Baltimore, MD 21203-0717
Street Address: 707 North Calvert Street, Baltimore, Maryland 21202

430

CONCURRENCE FORM FOR PROJECT PURPOSE AND NEED

I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

June 16, 1999

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Request for Concurrence:

Having discussed the project purpose and needs presented above, the following agencies, by their signature to this document, signify concurrence with the I-270 at Watkins Mill Road Extended Project Planning Study Purpose and Need.

Concur as Presented ☒ Concur with Comments _____ Do Not Concur _____

Comments / Reasons for Non-Concurrence: _____

Additional Information Needed: _____

Signature: Edu A. Whigiamella Agency: MDE Date: 7/9/99



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

June 25, 1999

RE: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, MD
PDMS No. 151170

Mr. J. Rodney Little
Office of Preservation Services
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Mr. Little:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your comments on the Purpose and Need for the I-270/Watkins Mill Road Extended project. Attached is a copy of the Purpose and Need informational package and summary statement.

Please provide your comments on the Purpose and Need by July 12, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph Kresslein at 410-545-8550.

Very truly yours,

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

By 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

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

Mailing Address: P.O. Box 747, Baltimore, MD 21203-0747
Street Address: 107 North Calvert Street, Baltimore, Maryland 21202

432

CONCURRENCE FORM FOR PROJECT PURPOSE AND NEED

I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

June 16, 1999

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Request for Concurrence:

Having discussed the project purpose and needs presented above, the following agencies, by their signature to this document, signify concurrence with the I-270 at Watkins Mill Road Extended Project Planning Study Purpose and Need.

Concur as Presented _____ Concur with Comments _____ Do Not Concur _____ No Objection X

Comments / Reasons for Non-Concurrence: _____

Additional Information Needed: _____

Signature: Erin Cole Agency: MHT Date: 7/9/99



**Maryland Department of Transportation
State Highway Administration**

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

June 25, 1999

RE: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, MD
PDMS No. 151170

Mr. Richard Spencer
U.S. Army Corps of Engineers
CENAB-OP-RX
P.O. Box 1715
Baltimore MD 21201

Attention: Mr. Steve Elinsky

Dear Mr. Spencer:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your concurrence with the Purpose and Need for the I-270/Watkins Mill Road Extended project. Attached is a copy of the Purpose and Need informational package and summary statement for concurrence.

Please provide your concurrence on the Purpose and Need summary statement by July 12, addressed to the attention of Ms. Gay L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph Kresslein at 410-545-8550.

Very truly yours,

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

By: Joseph R. Kresslein
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

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

434

CONCURRENCE FORM FOR PROJECT PURPOSE AND NEED

I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

June 16, 1999

Definition of Concurrence:

"Written determination by the agency that information to date is adequate and the agency agrees that the process can be advanced to the next stage. Agencies agree not to revisit the previous process steps unless conditions change."

Project Description:

The project involves a study of transportation access and mobility improvements to I-270 in the vicinity of the locally proposed extension of Watkins Mill Road.

Project Purpose Statement:

The purpose of the project is to provide improved access (vehicular, pedestrian, bicycle, and transit) to and from the transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas (Priority Funding Areas) of northern Gaithersburg. In addition, it is important to improve access to the Metropolitan Grove MARC Station to facilitate increased transit use.

Project Needs:

- Office/research, commercial, and residential development is planned for the northern portion of the City of Gaithersburg within the designated Priority Funding Area (PFA). Achieving the maximum zoning levels of this area is not possible without improvements to the transportation network. Approximately 6% of the office/research development and 43% of the residential development will not occur without these transportation improvements. Therefore, the approved development (94% of the office/research development and 57% of the residential development) further defines the need to address mobility and access within the existing transportation system to the planned economic development.
- The current Metropolitan Grove MARC Station is underutilized since there is poor access to the station from the interstate and arterial roadways surrounding the station. The provision of improved access or relocation is necessary to achieve optimum utilization of the mass transit system to accommodate the planned economic development area.
- In 1997, I-270 in the study area experienced failing levels of service in the peak hours at the I-270/MD 124 interchange. Full development as proposed by the City of Gaithersburg and the Montgomery County governments would overload the existing local transportation network.

Request for Concurrence:

Having discussed the project purpose and needs presented above, the following agencies, by their signature to this document, signify concurrence with the I-270 at Watkins Mill Road Extended Project Planning Study Purpose and Need.

Concur as Presented ☒ Concur with Comments ☐ Do Not Concur ☐

Comments / Reasons for Non-Concurrence: _____

Additional Information Needed: _____

Signature: SM [Signature] Agency: USACE Date: 7.8.99



**Maryland Department of Transportation
State Highway Administration**

435
Parris N. Glendening
Governor
John D. Porcari
Secretary
Parker F. Williams
Administrator

June 25, 1999

RE: Project No. MO839A11
I-270 at Watkins Mill Road Extended
Montgomery County, MD
PDMS No. 151170

Mr. John W. Howard
Superintendent
National Park Service
Antietam & Monocacy National Battlefields
P.O. Box 158
Sharpsburg MD 21782

Dear Mr. Howard:

In accordance with the merged Environmental/Regulatory Process, the Maryland State Highway Administration requests your comments on the Purpose and Need for the I-270/Watkins Mill Road Extended project. Attached is a copy of the Purpose and Need informational package and summary statement.

Please provide your comments on the Purpose and Need by July 12, addressed to the attention of Ms. Gay-L. Olsen in the Project Planning Division. Should you have any questions, please contact Mr. Joseph Kresslein at 410-545-8550.

Very truly yours,

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

By: 
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is _____

Maryland Relay Service for Impaired Hearing or Speech
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Mailing Address: P.O. Box 717, Baltimore, MD 21203-0717
Street Address: 707 North Calvert Street, Baltimore, Maryland 21202

VF B-8862 7-1-96

CONCURRENCE FORM FOR PROJECT PURPOSE AND NEED

I-270 at Watkins Mill Road Extended Project Planning Study

City of Gaithersburg, Montgomery County

June 16, 1999

Definition of Concurrence:

"Written determination by the agency that information to date is adequate and the agency agrees that the process can be advanced to the next stage. Agencies agree not to revisit the previous process steps unless conditions change."

Project Description:

The project involves a study of transportation access and mobility improvements to I-270 in the vicinity of the locally proposed extension of Watkins Mill Road.

Project Purpose Statement:

The purpose of the project is to provide improved access (vehicular, pedestrian, bicycle, and transit) to and from the transportation network to accommodate and provide sufficient capacity to serve planned economic development in designated growth areas (Priority Funding Areas) of northern Gaithersburg. In addition, it is important to improve access to the Metropolitan Grove MARC Station to facilitate increased transit use.

Project Needs:

- Office/research, commercial, and residential development is planned for the northern portion of the City of Gaithersburg within the designated Priority Funding Area (PFA). Achieving the maximum zoning levels of this area is not possible without improvements to the transportation network. Approximately 6% of the office/research development and 43% of the residential development will not occur without these transportation improvements. Therefore, the approved development (94% of the office/research development and 57% of the residential development) further defines the need to address mobility and access within the existing transportation system to the planned economic development.
- The current Metropolitan Grove MARC Station is underutilized since there is poor access to the station from the interstate and arterial roadways surrounding the station. The provision of improved access or relocation is necessary to achieve optimum utilization of the mass transit system to accommodate the planned economic development area.
- In 1997, I-270 in the study area experienced failing levels of service in the peak hours at the I-270/MD 124 interchange. Full development as proposed by the City of Gaithersburg and the Montgomery County governments would overload the existing local transportation network.

Request for Concurrence:

Having discussed the project purpose and needs presented above, the following agencies, by their signature to this document, signify concurrence with the I-270 at Watkins Mill Road Extended Project Planning Study Purpose and Need.

Concur as Presented X Concur with Comments _____ Do Not Concur _____

Comments / Reasons for Non-Concurrence: None

Additional Information Needed: None

Signature: J. W. Howard
J.W. Howard

Agency: Antietam/Maryland
NATIONAL BATTLEFIELD

Date: 7/1/99

VII. APPENDICES



**Maryland Department of Transportation
State Highway Administration**

438
Parris N. Glenn
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

MEMORANDUM

TO: Ms. Marsha Kaiser, Director
Office of Systems Planning and Evaluation
Maryland Department of Transportation

FROM: Ms. Cynthia Simpson
Deputy Director
Office of Planning and
Preliminary Engineering

DATE: November 7, 2001

SUBJECT: Project No. MO839B11
I-270/Watkins Mill Road Extended

Enclosed are the Project Consistency Report and Project Review Checklist with comment sheets for the I-270/Watkins Mill Road Extended project in Montgomery County. Please submit them to the Maryland Department of Planning. This will ensure consistency with the Maryland Economic, Growth, Resource Protection and Planning Act of 1992.

Enclosures (2)

cc: Ms. Anne Elrays, SHA-PPD
Mr. Bruce Grey, SHA-PPD
Mr. Joseph Kresslein, SHA-PPD
Ms. Melinda Peters, SHA-OHD
Mr. Douglas H. Simmons, SHA-OPPE
Mr. Glen Smith, SHA-RIPD
Mr. Russell Walto, SHA-PPD

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

VII-1

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**I-270 at Watkins Mill Road Extended
Selected Alternate 3 Revised**

Project Review Checklist Comments

TIER 1

1. Does the project add capacity to an existing facility or provide new capacity?

Yes. Selected Alternate 3 Revised will allow conversion of the existing inside lane on mainline I-270 to an HOV lane in each direction, along with provision of a new Collector-Distributor (C-D) lane system on each side of I-270 which will facilitate new access. New capacity would be created with construction of a new interchange and the extension of Watkins Mill Road.

2. Does the project facilitate changes in the existing pattern of growth?

No. According to the 1997 City of Gaithersburg Master Plan, a mixture of commercial, office and residential land uses are planned for the remaining vacant parcels in the study area. Almost all development proposed in the study area is either approved or under construction. Although the rate at which the planned development occurs may be affected by construction of the interchange, the type and location of the development are independent of the improvements selected at I-270 and Watkins Mill Road Extended.

TIER 2

1. Is the project consistent with the local comprehensive plan?

Yes. This project alternate is consistent with local Master Plans since it proposes the extension of Watkins Mill Road between MD 117 and MD 355 (included in the Gaithersburg Vicinity Master Plan and the City of Gaithersburg Master Plan) and the interchange between Watkins Mill Road Extended and I-270 (included in the City of Gaithersburg Master Plan).

2. Does the project support development in a suitable area, a designated development area, or a redevelopment area?

Yes. The Selected Alternate does support development and redevelopment in designated growth areas.

3. Can the project be designed to prevent adverse impacts to sensitive area: "

No. The Selected Alternate will require less than 6 acres of impacts to Great Seneca Creek State Park, slightly more than 6 acres of impact to 100-year floodplains, less than 1 acre of wetland impact, approximately 175 feet of stream relocation and approximately 30 acres of woodland impacts. Through coordination with the public and various resource agencies during the NEPA process, Selected Alternate 3 Revised incorporates several avoidance and minimization measures for impacts to streams, Seneca Creek State Park, 100-year floodplains and residences abutting the project area. Those measures include the use of retaining walls and bridging of wetlands/streams. In addition, mitigation would be provided in accordance with MD Reforestation Law, and in adherence to US Army Corps of Engineers and Maryland Department of the Environment aquatic resource permit requirements including stormwater management and sediment and erosion control plans.

4. If in a rural area, does the project promote compact growth in population centers?

N/A

5. Does the project provide opportunities to conserve resources?

Yes. The analysis of the Selected Alternate included all transportation infrastructure improvements contained in the Washington Metropolitan region's Constrained Long Range Plan (CLRP) as well as existing interstate access and options to improve access to the Metropolitan Grove MARC Station. The Selected Alternate encourages use of existing facilities as well as alternatives to single-occupant automobiles by accommodating HOV lanes on the mainline and facilitating improved access to the existing MARC and future Corridor Cities Transitway stations. The Selected Alternate will help relieve traffic congestion and delays at the existing I-270/MD 124 and I-270/MD 117 interchanges and the existing MD 124/MD 117 and MD 124/MD 355 intersections. The resulting improvements in level of service and reduced queue lengths lead to improved overall air quality, improved fuel efficiency and reduction of air pollutants.

6. Does the project promote economic growth and development in accord with the other elements of the State's Growth Policy?

Yes. The Selected Alternate promotes planned economic development in the Priority Funding Areas (PFA's) of Northern Gaithersburg.

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 Inconsistent with extraordinary circumstances



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Project Review Checklist:

Project Title: I-270 at Watkins Mill Road Extended
Project Location: I-270 from Great Seneca Creek/Game Preserve Road to MD 117 Interchange and the area between MD 117 and MD 355 (Northern Gaithersburg, Montgomery County).

Project Description: Selected Alternate 3 Revised proposes a full movement diamond interchange to and from I-270 at Watkins Mill Road Extended, including C-D roads from north of MD 117 to south of Middlebrook Road and the extension of Watkins Mill Road between MD 355 and MD 117.

Approximate Funding Share

STATE	LOCAL	FEDERAL	OTHER
\$24.3 Million+		\$97.4 Million+	\$20.5 Million*

Costs are based on 80% Federal and 20% State and Cost and include right-of-way acquisition.

+State and Federal portions do not include deductions for anticipated developer right-of-way dedication.

*Anticipated developer participation beyond any right-of-way dedication for interchange ramps

Tier 1

Yes	No	
X		1. Does the project add capacity to an existing facility or provide new capacity for an area not currently served by the facility?
	X	2. Does the project facilitate changes in the existing pattern of growth?

If answer to either question is "yes" proceed to Tier 2

Tier 2

Yes	No	
X		1. Is the project consistent with the local comprehensive plan?
X		2. Does the project support development in a suitable area, a designated development area, or a redevelopment area?
	X	3. Can the project be designed to prevent adverse impacts to sensitive areas?
N/A		4. If in a rural area, does the project promote compact growth in existing population centers
X		5. Does the project provide opportunities to conserve resources?
X		6. Does the project promote economic growth and development in accordance with other elements of the State's Growth Policy?

Explain "no" answers on reverse. If determination is that project is "inconsistent," proceed to Tier 3

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THE WILSON T. BALLARD COMPANY

TELEPHONE MEMORANDUM

PROJECT: I-270/Watkins Mill Road Extended DATE: 11/02/01
FILE NO.: 100-225.01 TIME:
CALL TO: Arnold Norden and Walt Brown – Maryland DNR
CALL FROM: Mark Lotz
TELEPHONE NO.: 410-260-8406 and 301-924-2127

SUBJECT: Coordination Regarding Seneca Creek State Park Impacts

The undersigned conducted separate phone conversations with Arnold Norden and Walt Brown on October 25, 2001 and November 2, 2001, respectively. The conversations were in reference to the extent and nature of Seneca Creek State Park impacts resulting from the Selected Alternate (Alternate 3 Revised) for the referenced project. Mr. Norden initially thought that a meeting may be necessary to discuss the impacts, but reconsidered following our conversation.

I explained that the Selected Alternate, as depicted in the final environmental document, includes various design amenities (e.g., alignment, bridges, retaining walls) and assumptions for stormwater management areas in the vicinity of the park, that are based on best engineering judgment at this stage of the project. There may be further refinements in the final design stage based on detailed topographic surveys, borings and hydrologic/hydraulic studies.

Mr. Norden had thought the project was in design, and based on this explanation, agreed that a meeting and/or further input from DNR was not necessary at this time as long as coordination regarding park impacts and interchange design continued into the design stage. Mr. Brown concurred that a meeting or other further discussion was not immediately necessary, based on the direction from Mr. Norden.

By Mark D. Lotz 

cc: Ms. Anne Elrays
File

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STATE HIGHWAY ADMINISTRATION

Project Planning Division

TRANSMITTAL

DATE: October 17, 2001		PROJECT: I-270/WME	
DATE ACTION DUE: N/A			
TO: Arnold Norden		FROM: Anne Elrays	
☐	FOR YOUR INFORMATION	☐	FOR YOUR APPROVAL
☐	TAKE APPROPRIATE ACTION	☐	DISCUSS WITH ME
X	AS YOU REQUESTED	☐	OTHER:
☐	FOR YOUR COMMENT	☐	
REMARKS: <u>Thank you for your comments. I understand that replacement will be required should impacts to the Seneca Creek State Park be unavoidable, and that coordination will continue with the Park jurisdictional officer regarding impacts/replacement throughout project development.</u>			
MATERIAL TRANSMITTED:			
1	Selected Alternate Package		
1	4(f) impacts section		
	Accompanying mapping		
1	Meeting Minutes with Park (3/19), COE, FHWA (2/28), with FHWA (2/8), with COE (1/25).		

cc: File

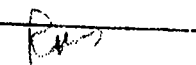


MONTGOMERY VILLAGE FOUNDATION, INC.

10120 APPLE RIDGE ROAD
MONTGOMERY VILLAGE, MARYLAND 20886-1000
(301) 948-0110 FAX (301) 990-7071 www.mvf.org

July 3, 2001

RECEIVED
JUL - 6 2001

THE WILSON T. BALLARD CO
BY 

Mark Lotz
Wilson T. Ballard Company
17 Gwynns Mill Court
Owings Mills, MD 21117

Dear Mark:

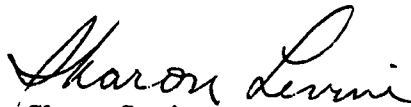
Thank you for participating in the June 19 meeting of the Montgomery Village Foundation (MVF) Sub-committee to study Watkins Mill Road Extended@ I-270 traffic issues. Your input and ideas are very much appreciated.

I am enclosing a copy of my notes from the June 19 meeting. Please check it over, paying particular attention to the points on which we agreed. If my notes are not accurate or if you wish to make additions, please feel free to do so. One point on which we had agreed, that MVF would solicit a memorandum of understanding between the Foundation and the County, in which the County would promise to get MVF input prior to proceeding with projects on County roads within Montgomery Village, is already in place. I have omitted that item.

We look forward to future meetings with you.

Thank you again for sending the *Ultimate Revised Alternate 3* plan. Please keep me posted, and I will do likewise.

Sincerely,



Sharon Levine
Director of Government Relations

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**Notes from June 29 Meeting of MVF Sub-Committee on the Watkins Mill Rd.
Extended @ I-270 Project**

A meeting of the Montgomery Village Foundation Sub-committee to study options for traffic calming and pedestrian and vehicular safety as it relates to the Watkins Mill Road Extended @I-270 project (now known as Revised Alternate 3) was held on June 19, 2001. Please keep in mind that these are my notes; they are not minutes.

Members Present

Dick Wright, MVF Board President
Saul Schepartz, MVF Board Member
Frank Mondell, TD&PF Committee member
Sharon Levine, Director of Government Relations

Others Present

Dan Hardy, Master Plan Coordinator M-NCPPC
Mark Lotz, Wilson T. Ballard Company representing State Highway Administration (SHA)
Jeremy Beck, State Highway Administration
Dave Loughery, Senior Planning Specialist, Montgomery County Traffic Safety, Investigations and Planning

Mark Lotz of SHA presented a map of Revised Alternate 3 and provided reasons for going ahead with the project: (1) the need to mitigate projected traffic congestion, particularly when considering the already approved development that will be going in around the MV area, (2) the need to provide access to and from the two Casey Tract developments, (3) the desire for an expanded MARC station, particularly in light of the possibility that MARC could become the last stop on metro's Red Line, (4) Village residents who want to get to the other side of I-270 to the job corridor could easily do so via Watkins Mill Road Extended.

Mr. Lotz stated that the developer of the Casey Tracts will build the extensions of Watkins Mill Road during the next 15 months or so. However, the developer will not connect the two ends of Watkins Mill Road; that is the responsibility of SHA. He stated that the extensions of Watkins Mill Road would likely include one intersection between Rt. 355 and I-270 and two intersections between I-270 and Rt. 117.

Mr. Lotz stated that the Revised Alternate 3 project is currently not funded. He stated, however, that the project will likely to go forward in two phases, the first to be completed by '07. Phase one would consist of building the full ramps and the necessary CD lanes to make the intersection work. Phase two would consist of completing 2 or more miles of CD roads when the overall Corridor improvements are made.

Mr. Lotz stated that the functional grading of intersections, from highest to lowest, is as follows:

- 447
1. Freeway
 2. State Highway
 3. Arterial road (no speed humps, mixture of residential and business, need for people to make a longer distance trip)
 4. Primary
 5. Secondary
 6. Residential streets

Dan Hardy, Master Plan Coordinator, M-NCPPC, discussed the benefits of building Revised Alternate 3. He stated that a congestion relief study showed that the Rt. 124 at Rt. 355 intersection is one of the most congested intersections in the County and that it is projected to be in deep failure by 2020 unless relief is provided by Revised Alternate 3. Mr. Hardy also presented the results of a recent State traffic study for Watkins Mill Road which showed that even without the proposed Revised Alternate 3 interchange, traffic would increase on Watkins Mill Road at Stedwick Road from 9,000 to 15,000 cars per day by 2020. The study also showed that with the Watkins Mill@I-270 intersection, the volume would be 17,000 cars per day by 2020 on Watkins Mill Road. While the proposed interchange would add an additional 2000 cars per day on Watkins Mill Road in 2020, it would also provide freeway access for those cars.

Mr. Hardy stated that the County ^{is in the process of developing} has a Transportation Policy Report and that it addresses services, infrastructure, land use policy, 25-year projections and 50-yr projections.

Mr. Hardy stated that the County might look at widening roads that currently are not in the Constrained Long-Range Plan but are in the Gaithersburg Vicinity Master Plan. He stated that M-83 could provide a relief valve for Watkins Mill Road. A Board member stated that that would be unacceptable to MVF. Mr. Hardy next discussed the current schedule for widening Goshen Road (2015), Snouffer School Road (2020) and Brink and Wightman Roads (2025). At present, all of those widening projects are in the Constrained Long Range Plan, but only Goshen Road is presently identified in the County CIP as a likely new project planning study within the Facility Planning process for '01-'02 and beyond. A sub-committee member suggested that the schedule for widening those roads be moved forward. Mr. Hardy stated that it was unlikely the County would move the schedule forward at this time for all of the roads, but that MVF may wish to consider advocating now for a study of the widening of Snouffer School Road. Mr. Hardy stated that the Gaithersburg Vicinity Master Plan would be revisited in '02 and that traffic policy would define the priorities.

Dave Loughery, Montgomery County's traffic calming expert, has a desire to work with MVF on traffic calming for Watkins Mill Road. He stated that there is a need to create a pedestrian-friendly environment there, particularly during the two daily school arrival and dismissal peaks. Mr. Loughery offered several thoughts about traffic calming:

- Roundabouts are very effective
- Traffic signals cause speeding (people anticipate the light turning red and so speed up, hoping to avoid the long delay)

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- 4-way stops are an excellent traffic calming device
 - Speed humps currently are prohibited on arterial roads
 - Watkins Mill Road within M.V. is calmed up to Apple Ridge Road

Mr. Loughery was asked to provide more details about his thoughts on traffic calming. When asked what the effect is of flashing lights in school zones, he stated that they are not very effective. Double fines are a plus if the police will enforce them, he stated. He believes roundabouts are excellent but that there is always a problem to make sure there is enough right-of-way. He feels that there may not enough right-of-way on Stedwick Road and Watkins Mill Road to create a roundabout. He further stated that roundabouts can be very pedestrian-friendly, that they use deflection, that they minimize the delays and calm people. He stated that roundabouts are entered slowly, which forces drivers to slow down. Mr. Loughery stated that possible sites for roundabouts are: Watkins Mill Road at Stedwick Road, Watkins Mill Road at Club House Road, or possibly directly in front of the new entrance to Montgomery Village Middle School (MVMS). Mr. Loughery also stated that another idea for pedestrian safety is the use of pedestrian refuge islands, which do not regiment pedestrians. He stated that attractive fencing can be used to direct pedestrians where not to cross a street.

Mr. Mondell stated that the traffic calming on Watkins Mill Road should be coordinated with City of Gaithersburg. Mr. Mondell further stated that it is not MVF's intent to shut down traffic on Watkins Mill Road, but to reduce speed. He emphasized the need to maintain the serpentine curve in Watkins Mill Road north of Apple Ridge Road, the need for more medians and the overall need to make sure there are enough traffic calming devices on Watkins Mill Road.

Mr. Wright stated that he would like to see the County develop a letter committing to certain steps regarding the monitoring of traffic flow and the desire to continue to meet with this subcommittee to study traffic. He further stated that MVF wishes to be in the position of having a say in future traffic calming plans. Mr. Wright stated that he urges the County and State to make traffic counts both before and after the connection of MD Rt. 118 to confirm the effects on Montgomery Village traffic.

Mr. Loughery stated that the serpentine curves north of Apple Ridge Road were put there to discourage people traveling south from entering the Village at high speeds. He stated that it is possible the S curve is slated to be straightened and that he would find out whether this is true. Mr. Loughery stated that traffic calming should occur on Watkins Mill Road beyond Apple Ridge Road toward Germantown.

A Sub-committee member suggested the possibility of putting a roundabout at the Apple Ridge Road and Watkins Mill Road intersection. This would bring to three the number of possible roundabout sites for Watkins Mill Road within Montgomery Village that were suggested at this meeting.

A Sub-committee member questioned whether MVF should take a new position on Revised Alternate 3.

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The sub-committee members and the invited government agency representatives agreed upon the following points:

- aggressive action will be taken to encourage Montgomery County Public Schools to actively participate in advocating for traffic calming that is necessary along Watkins Mill Road in front of MVMS prior to its re-opening in '03;
- it is essential that new traffic calming measures be in place in front of MVMS prior to its re-opening in '03 to ensure pedestrian and vehicular safety;
- MVF will pursue lobbying the County to move the dates forward for the widening of Goshen, Snouffer School, Brink and Wightman Roads with special emphasis on encouraging the County to do the Snouffer School road study now;
- MVF will lobby the County and State to commit to: performing traffic counts before and after the connection of MD Rt. 118 to confirm the effects on our traffic and continuing to meeting with this sub-committee to discuss traffic issues, agreeing that if traffic volumes increase on Watkins Mill Road, traffic monitoring will be performed on a regular basis.
- County officials will consider presenting a plan for the possible enhancement of the intersection at Apple Ridge Road with Watkins Mill Road.

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MEMORANDUM

TO: Ms. Cynthia Simpson
Deputy Director
Office of Planning and
Preliminary Engineering

FROM: Mark D. Lotz
Project Manager for
Project Planning Division *Mark D. Lotz*

DATE: July 6, 2001

SUBJECT: Project Number MO839B11
I-270/Watkins Mill Road Extended Study
Montgomery County

RE: June 19, 2001 Montgomery Village Foundation Meeting

A meeting was held on Tuesday, June 19, 2001 with representatives of the Montgomery Village Foundation (MVF) to update the group on the progress of the I-270/Watkins Mill Road Extended study and discuss possible traffic calming measures within Montgomery Village that could be implemented by Montgomery County. Attached are minutes that were prepared by the MVF. These minutes as written by MVF accurately reflect the meeting. A clarification to the minutes is that the I-270/Watkins Mill Road Extended project schedule is dependent on funding and, as presented in the minutes, reflects a best-case scenario.

If you have any questions, please feel free to contact me by telephone at 410-545-8547 or by email at mlotz@wtbco.com.

Attachment
cc: File

451

MEMORANDUM

TO: Ms. Cynthia Simpson
Deputy Director
Office of Planning and
Preliminary Engineering

FROM: Mark D. Lotz *Mark D. Lotz*
Project Manager for
Project Planning Division

DATE: April 6, 2001

SUBJECT: Project Number MO839B11
I-270/Watkins Mill Road Extended Study
Montgomery County

RE: April 5, 2001 Montgomery Village Foundation Subgroup and Montgomery
County Public Schools Transportation Meeting

A meeting was held in the field on Thursday, April 5, 2001 with representatives of the Montgomery Village Foundation (MVF) and Montgomery County Public Schools to review traffic operations associated with Watkins Mill High School, Montgomery Village Middle School, Stedwick Elementary School and Watkins Mill Elementary School. Dismissal and bus egress was reviewed at each location. Pedestrian activities were also observed. Discussions were tied in to the on-going analysis of potential traffic calming measures within Montgomery Village that could be implemented by Montgomery County.

If you have any questions, please feel free to contact me by telephone at 410-545-8547 or by email at mloetz@wtbco.com.

cc: File

**SUMMARY OF I-270/WATKINS MILL ROAD MEETING WITH
THE MONTGOMERY VILLAGE FOUNDATION
TUESDAY, MARCH 27, 2001**

A meeting was held with the City of Gaithersburg and representatives of the Transportation, Development and Public Facilities Committee of the Montgomery Village Foundation on Tuesday, March 27, 2001 at the North Creek Community Center in Gaithersburg to discuss the I-270/Watkins Mill Road Extended study. Mark Lotz (The Wilson T. Ballard Co.); Jeremy Beck (SHA – Project Planning); Ollie Mumpower (City of Gaithersburg); and Eric Soter (City of Gaithersburg) represented the I-270/Watkins Mill Road Extended study team. The Montgomery Village community requested this meeting and asked that it focus on possible traffic calming measures along Watkins Mill Road in the Montgomery Village community and the prevention of access to the community along Watkins Mill Road at MD 355.

The group first discussed Peter Henry's suggestion to prevent Watkins Mill Road traffic from crossing MD 355. Sharon Levine (Montgomery Village Foundation) felt that drivers on Watkins Mill Road who could not directly cross MD 355 would instead turn into Montgomery Village at Travis Avenue or Christopher Avenue. Ollie explained that many drivers who wanted to cross MD 355 would instead either turn left or right onto MD 355, and then make a U-turn and double back to Watkins Mill Road. This type of turning movement would greatly increase traffic on an already congested segment of MD 355. Montgomery Village representatives asked about putting up "no U-turn" signs on MD 355, and Ollie said that it would only move the problem further away, not solve it.

Next, the group discussed possible traffic calming measures on Watkins Mill Road within the Montgomery Village community. Mark explained that because Watkins Mill Road is within the City of Gaithersburg limits, the City would study traffic calming, not SHA. Ollie explained that because Watkins Mill Road is an arterial, the types of traffic calming methods that can be used are limited. In addition, he explained that the purpose of traffic calming is not to prevent through traffic, but to slow it down to increase safety. Sharon reiterated her statement that the community is primarily concerned about school safety as a result of traffic. She said that she would like to see traffic calming measures studied over the entire length of Watkins Mill Road east of MD 355.

Sharon then said that the Montgomery Village Foundation board of directors continues to support the No-Build Alternate, but that the board must make the final decision of what alternate to support. She added that the Montgomery Village Foundation still feels that roads north of the community should be included in the I-270/Watkins Mill Road Extended study.

Detailed minutes of this meeting will be available from the Montgomery Village Foundation.



**Maryland Department of Transportation
State Highway Administration**

453
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

MEMORANDUM

TO: Ms. Cynthia Simpson
Deputy Director
Office of Planning and
Preliminary Engineering

FROM: Mark D. Lotz
Project Manager for
Project Planning Division *Mark D. Lotz*

DATE: April 2, 2001

SUBJECT: Project Number MO839B11
I-270/Watkins Mill Road Extended Study
Montgomery County

RE: March 19, 2001 subgroup meeting with Department of Natural Resources

A subgroup meeting was held on Monday, March 19, 2001 with representatives of the Department of Natural Resources (DNR) to discuss Section 4(f) impacts to Seneca Creek State Park associated with the subject interchange and to propose mitigation locations. The following people were in attendance:

Jeremy Beck	SHA-PPD	410-545-8518
Walt Brown	DNR	301-924-2127
Anne Elrays	SHA-Environmental	410-545-8562
Peter Henry	BP Realty/Casey Property	301-299-5315
Mark Lotz	The Wilson T. Ballard Company	410-363-0150

The meeting began at 10:00 AM with brief introductions. The following is a summary of the topics that were discussed.

Park Impacts/Alternates Under Consideration

Mark Lotz first provided an overview of Alternate 3 Revised and discussed the potential right-of-way impacts to Seneca Creek State Park as part of the I-270/Watkins Mill Road Extended study and the I-270/US 15 Multi-Modal Corridor Study. Alternate 3 Revised incorporates southbound I-270 C-D lane compatibility to be consistent with preliminary findings from the I-270/US 15 Multi-Modal Corridor Study.

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

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A painted southbound C-D roadway has been proposed along with a mainline eastern shift (up to 19 feet) and a retaining wall along the west side immediately north of the proposed Watkins Mill Road crossing of I-270. Section 4(f) impacts can be avoided in the southbound direction on I-270 with Alternate 3 Revised, but impacts to Seneca Creek State Park would still occur in the northbound direction. However, even though park impacts can be avoided by the Watkins Mill Road Extended study, all build alternates under consideration as part of the I-270/US 15 Multi-Modal Corridor Study would have right-of-way impacts to the Seneca Creek State Park. Mark then stated that SHA is currently in the process of selecting a preferred alternate to present to the SHA Administrator for the Watkins Mill Road Extended study. While the study team feels Alternate 3 Revised is the best overall alternate, SHA will not choose it as the preferred alternate until traffic and cost issues are addressed.

Section 4(f) Issues

Mark explained that at previous meetings with the US Army Corps of Engineers, they requested that the stream and wetland system running parallel and adjacent to southbound I-270 in this area be set aside as some type of park or nature preserve. This area is currently part of the Casey Tract, which has been zoned for development. A plot of land west of I-270 and north of the proposed Watkins Mill Road alignment is currently owned by the City of Gaithersburg as a deferred development zone, but Peter Henry, the developer of the Casey Tract, is interested in purchasing that property. In accordance with the US Army Corps of Engineers suggestion and as agreed with FHWA, Mark suggested that the DNR should consider annexing the stream and wetland into Seneca Creek State Park as part of the Watkins Mill Road study's Section 4(f) mitigation.

Peter indicated that his development plans for the Casey Tract west of I-270 have tentatively been approved by the City of Gaithersburg. He has a meeting with the City of Gaithersburg Planning Commission on April 4, 2001 to request official approval of his development plans. He stated that the City of Gaithersburg had preferred a park at that location, but the cost was too high to make a park feasible for the City. The Casey Tract has therefore proposed the City's second choice, which is low density housing, and Peter presented to the group a development plan showing low density residential housing for the tract. Peter explained that the wetland and stream tributary system that runs across the tract, as well as a buffer area, would not be developed. He added that the Casey Tract is being developed in such a way that the wetlands along I-270 would be important visually for the development, but would not be easily accessible and would not be used as a recreation area. Peter said that he would like to see the wetland strip along I-270 preserved as a wildlife corridor. He then said that he would most likely need to retain ownership of the undeveloped wetland in order to comply with his required green space calculation, as well as for its tax benefits.

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Next, the group discussed the current state of the stream and wetlands area. Anne asked if anybody currently uses the stream or wetlands for hiking or fishing, and Peter said that they do not. The stream and wetlands are on private property. Also, the stream's meanders and the generally muddy ground in the wetland are not conducive to public use as a recreation area. Peter also said that the stream tributaries that run across the Casey Tract currently have severe bank erosion because rainwater flows too quickly through them. As a result, Peter said that the tributaries do not currently support any significant plant life. He said that when the Casey Tract is developed, he could probably take measures to improve the quality of the stream by constructing stormwater management ponds and slowing down the flow of water in the tributaries. However, the stream itself does support fish. In addition, the wetlands on the Casey Tract are not contiguous with Seneca Creek State Park; they also cross several residential properties on Game Preserve Road and the Pepco power lines.

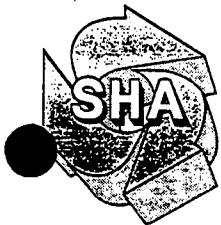
Walt said that DNR will most likely not be interested in pursuing the annexation of the stream and wetlands because it will not be contiguous with the rest of Seneca Creek State Park. DNR usually does not prefer to own land in close proximity to development because of maintenance difficulties, such as cleaning up trees on the parkland that have fallen into developed areas. Walt also stated that land adjacent to development usually tends to collect trash that is discarded by the nearby developed areas. Walt said that even if precautions are taken, the increase in impervious land area caused by development will degrade the stream quality, even though the developer would construct stormwater management ponds. Walt indicated that mitigation for impacts to Great Seneca Park could be completed through the State banking agreement at a later point in time. However, Walt explained to the group that the DNR environmental review section will have to make the final decision on whether to take the stream and wetland. He said that the environmental review section would need a copy of the alternates mapping and the Casey Tract development plan before they can make a decision.

Follow-Up Issues

Mark and Anne will send copies of the Alternate 3 Revised mapping, the Casey development plan and a copy of these minutes to Arnold Norden of the DNR Environmental Review Section for him to consider annexing the wetland into Seneca Creek State Park.

If you have any questions, please feel free to contact me by telephone at 410-545-8547 or by email at mloetz@wtbco.com.

cc: File
Attendees
Project Team



**Maryland Department of Transportation
State Highway Administration**

456
Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

MEMORANDUM

TO: Ms. Cynthia Simpson
Deputy Director
Office of Planning and
Preliminary Engineering

FROM: Mark D. Lotz
Project Manager for
Project Planning Division

DATE: March 15, 2001

SUBJECT: Project Number MO839B11
I-270/Watkins Mill Road Extended (WMRE) Study
Montgomery County

RE: February 28, 2001 Project Meeting with The U.S. Army Corps of Engineers and
Federal Highway Administration

*Jeremy J. Beck
for*

A meeting was held on Wednesday, February 28, 2001 to follow-up on issues discussed at the January 25, 2001 meeting regarding design and environmental issues, including Section 4(f), associated with the subject interchange. The following people were in attendance:

Jeremy Beck	SHA-PPD	410-545-8547
Joe DeMent	The Wilson T. Ballard Company	410-363-0150
Steve Elinsky	Corps	410-962-6024
Anne Elrays	SHA-Environmental	410-545-8562
Mark Lotz	The Wilson T. Ballard Company	410-363-0150
Melinda Peters	SHA-HDD	410-545-8772
Jim Scouten	FHWA, Asst. Chief Council	410-962-4342
Denise Winslow	FHWA	410-962-4342
Jeff Wolinski	Jeff Wolinski, Consult. Ecologist	410-329-2277

The meeting began at 9:00 AM with brief introductions. The following is a summary of the topics that were discussed.

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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

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Stream Impact/Design Issues

Mark Lotz provided an update of several key issues. Following the January 25, 2001 meeting, a team meeting was held at which it was decided to incorporate southbound I-270 C-D road compatibility into Alternate 3 to be consistent with preliminary findings from the I-270/US 15 Multi-Modal Corridor Study. Based on that meeting and a subsequent February 8, 2001 meeting with FHWA, a painted C-D roadway has been incorporated into along with a mainline eastern shift (up to 19 feet) and a retaining wall along the southbound roadway to include the C-D roadway without necessitating any stream relocation for the straight segment of stream tributary immediately north of the proposed Watkins Mill Road crossing of I-270. The resulting design has been renamed Alternate 3 Revised. It has been confirmed with greater certainty that a retaining wall can be constructed along this segment of southbound I-270 without impacting the stream.

Alignment studies for the southbound I-270 exit ramp to Watkins Mill Road have also been undertaken following the January 25th Corps meeting to provide a 50 mph design speed, minimize impacts to Game Preserve Road properties, and minimize stream and wetland impacts. The result of these studies was two options which were presented to Mr. Elinsky.

The first option consists of a southbound exit ramp alignment that includes a gore location within the PEPCO power line right-of-way, then continues perpendicularly across the tributary (bridged) and remains completely west of wetland W-102. This option requires a 40 mph design speed curve for the segment just north of the intersection with Watkins Mill Road. Melinda Peters did not object to the use of a 40 mph curve at this location as long as 50 mph criteria is used for the first curve after exiting the Interstate.

Option 1 would require approximately 100 linear feet of stream relocation at a sharp elbow in the existing stream within the PEPCO right-of-way in combination with retaining wall to minimize the extent of stream relocation. Mr. Elinsky and Mr. Wolinski concurred that the relocation is proposed in a segment of stream that is significantly degraded; however, Mr. Elinsky expressed concern that cutting off the elbow in the stream will increase its gradient resulting in velocity increases. Mr. Wolinski stated that, consistent with Rosgen parameters, energy could be dissipated adequately using vertical undulations. He added that benching could be provided to replicate the existing floodplain width, bolder armoring could be provided to prevent migration of the bend towards I-270 (which is occurring today), and shrubs could be planted to provide habitat enhancement and stabilization of the stream banks.

A second option was presented which included a bridge just south of the gore to avoid stream relocation with a culvert for the tributary crossing. Mr. Elinsky requested that Option 2 be dropped and stated his support for Option 1, provided that necessary coordination is undertaken with PEPCO to ensure that stream relocation and plantings can take place within their right-of-way. A copy of the Alternate 3 Revised plan will be forwarded to Mr. Elinsky.

Mr. Elinsky restated his previous request that the stream and wetland system running parallel and adjacent to southbound I-270 in this area be set aside as some type of park or nature preserve. He also inquired as to the status of available wetland mitigation for the project. Anne Elrays responded that it appears that the previously identified Linthicum and Hawkins sites will likely be ample for mitigation.

Section 4(f) Issues

Jim Scouten, FHWA Assistant Chief Council for Eastern Legal Services, was asked to attend this meeting and provide a preliminary assessment of the legal sufficiency of not picking a 4(f) avoidance (Seneca Creek State Park avoidance) alternate for this project. The concern has been that, given the public opposition to the full interchange and the availability of 4(f) avoidances, legal sufficiency may be lacking for the selection of Alternate 3. With the Northbound Braided Ramps Option, which has been reviewed by FHWA staff and found to be acceptable geometrically, Alternate 3 does not have Section 4(f) impacts. However, Alternate 3 would not be compatible with C-D roads that are a part of all build alternates being considered with the I-270/U.S. 15 Corridor Study. All build alternates under consideration in the Corridor Study would impact the Seneca State Park.

Hearing all the issues, Mr. Scouten stated that there are sufficiently strong arguments for selecting Alternate 3 Revised, based on the following:

- Although the Northbound Braided Ramps Option is feasible based on the FHWA judgement that it is adequate geometrically, it is not prudent because a substantial portion of the improvement would be wasted when C-D roads, which are well into the formal planning process, are built. Therefore, the braided ramps would be inconsistent with improvements that are part of a formal plan. The C-D roads would have 4(f) impact at the same resource that the Northbound Braided Ramps Option avoids.
- The braided ramps are vastly inferior to the basic Alternate 3 Revised design from an operational standpoint since they would result in three closely spaced merges of high volume ramps onto the congested mainline of I-270.
- There is an attractive mitigation package available with the Great Seneca Creek tributary riparian corridor along southbound I-270. Mr. Scouten stressed the importance of incorporating the creation of this park annexation as part of this project.

If you have any questions please feel free to contact me by telephone at 410-545-8547 or by email at Mlotz@wtbco.com.

Ms. Cynthia D. Simpson
I-270/Watkins Mill Road Extended
Project Team Meeting with COE and FHWA
Page 4

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Attachments

cc: File (with attachments)
Project Team (attachments upon request)



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

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MEMORANDUM

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

FROM: Mark D. Lotz
Project Manager for
Project Planning Division

Jeremy Beck for

DATE: February 20, 2001

SUBJECT: Project Number MO839B11
I-270/Watkins Mill Road Extended (WMRE) Study
Montgomery County

RE: February 8, 2001 Project Meeting with FHWA Representatives

A meeting was held on Thursday, February 8, 2001 at FHWA offices to provide a general update on project issues and discuss the process for formulating an SHA preferred alternate resolving 4(f) issues and to complete the Interstate Access Point Approval process. The following people were in attendance:

Dan Johnson	FHWA	410-962-4342
Esther Strawder	FHWA	410-962-4342
Denise Winslow	FHWA	410-962-4342
Anne Elrays	SHA-Environmental	410-545-8562
Joe DeMent	The Wilson T. Ballard Company	410-363-0150
Mark Lotz	The Wilson T. Ballard Company	410-363-0150

The meeting began at 9:00 AM with brief introductions and greetings. The following is a summary of the topics discussed:

Background Issues:

Anne Elrays and Mark Lotz briefly summarized key project issues and public comments from the January 16, 2001 Public Hearing. The need for the project is based on general congestion at the MD 124 and MD 117 interchanges with I-270, overall regional growth and the extensive levels of proposed development in the largely vacant parcels in the immediate project area.

My telephone number is _____

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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

4/6/01

Several surrounding residential communities, such as Montgomery Village are strongly opposed to the project's build alternates, particularly those alternates that include an interchange at Watkins Mill Road and I-270. Traffic growth on Watkins Mill Road east of MD 355 is the primary concern, as there are three schools directly fronting the road within two miles of the proposed interchange. These communities may have the misperception that the planned development in the Casey Tract, Monument and IBM parcels would be substantially reduced without a build alternate, whereas the Gaithersburg Master Plan indicates that as much as 95% of the planned development may occur without an interchange.

The City of Gaithersburg will hold a Work session on February 12th to consider reducing the levels of allowable development in Neighborhood Five (Casey Tract).

There are several environmental issues of concern with the proposed alternates, the most noteworthy of which are the Seneca State Park (4(f) resource) crossing at I-270 and the associated stream and wetland system on the west side of I-270.

Recent findings from the I-270/US 15 Study indicate that a two-lane C-D road with auxiliary lanes at proposed interchanges along I-270 is needed along both northbound and southbound I-270 throughout the proposed Watkins Mill Road interchange study area. As presented at the hearing, of the full interchange alternates, I-270/Watkins Mill Alternate 2 (various options) was compatible with C-D roads southbound, but Alternate 3 was not.

A meeting was held with the U.S. Army Corps of Engineers on January 25, 2001 at which some of the design and environmental issues were discussed in detail. The meeting resulted in a consensus that Alternate 3 is the most favorable full interchange alternate, and that Alternate 2 has significant flaws with regard to stream impacts. It was also decided that the exit ramp from southbound I-270 to Watkins Mill Road should have a 50 mph design speed, a 1,500-foot minimum gore spacing should be maintained between the successive southbound exit ramps and a retaining wall should be considered as needed to avoid relocating the stream tributary immediately adjacent to I-270.

Design Modifications:

Based on the increased certainty that C-D roads are needed in the long term, the I-270/Watkins Mill Road Team has reevaluated Alternate 3 and found that it can be adapted for use with a southbound C-D roadway provided a painted C-D typical section with a 10-foot shoulder adjacent to the mainline, a four-foot buffer, a 24-foot C-D roadway and a 10-foot shoulder adjacent to jersey barrier is permissible. Alternate 3 with the painted C-D has been renamed Alternate 3 Revised. FHWA Area Engineer, Esther Strawder concurred that this proposed revised section is adequate, as is the 1,500-foot gore spacing.

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Similar modifications could be made to the partial interchange Alternate 4 to allow it to be compatible with C-D roads. However, FHWA representatives did not favor Alternate 4, as it would introduce another partial interchange into a portion of interstate that already has three partial interchanges within close proximity.

4(f) Involvement

Some additional analysis needs to be completed to determine the Section 4(f) impacts with Alternate 3 Revised. On initial inspection, it appears that 4(f) impacts can be avoided in the southbound direction with Alternate 3 Revised, but it would still impact Seneca State Park in the northbound direction. Section 4(f) impacts could be avoided northbound with Alternate 3 Revised only with implementation of the Northbound Braided Ramps Option. This option was reviewed. The general consensus was that traffic operations would be a significant concern with the Northbound Braided Ramps Option, given that it would introduce three successive high traffic volume merges with mainline I-270 at AASHTO minimum gore spacing. This option would also not be compatible with the ultimate corridor C-D system, if selected.

Dan Johnson stated that, based on all information presented, it would be hard not to select Alternates 4 or 6, based on their 4(f) avoidance and more favorable public support. Denise Winslow stated that alternate selection will be very sensitive from a legal sufficiency viewpoint, given the subjective nature of the purpose and need (lack of detailed traffic data), the 4(f) involvement and the public controversy. She will invite FHWA legal personnel to become involved in the project as soon as possible, probably at the February 28th follow-up meeting with the Corps.

Preferred/Selected Alternate Development Process

Key upcoming project meetings/milestones include the following:

Meeting	Date	Time	Place
Project Team Meeting	Feb. 26 th	10:00 AM	SHA - PPD Conference Room (Rm. 346)
Core Team Meeting with Corps of Engineers	Feb. 28 th	9:00 AM	SHA - Rm. 310
Project Team Meeting with Deputy Administrator and Planning Director with Draft Preferred Alternate (s)	March 1 st	10:30 AM - 12:00 PM	SHA - Rm. 400
Focus Group Meeting	March 1 st	6:30 - 8:30 PM	City Hall - Gallery City of Gaithersburg
IAR Meeting to Present Preferred Alternate	March 21 st	9:00 AM	SHA - Training Room 1
Admin. Meeting Draft Selected Alternate	April 3 rd	10:00 AM	SHA - Rm. 400
IAR Meeting - Handout SHA Selected Alternate	May 16 th	9:00 AM	SHA - Training Room 1
IAR Meeting - Presentation SHA Selected Alternate	June 29 th	9:00 AM	SHA - Training Room 1

Initially, Denise Winslow requested an advance copy of the preferred alternate package one month before the March interagency. In a subsequent discussion with Anne Elrays, Denise agreed that it would be sufficient to receive a preliminary draft package approximately March 1st, at the same time as the Deputy Administrator/Planning Director Meeting.

This package will include the results of various on-going engineering and traffic analyses, to the extent they are complete. Some of the follow-up traffic analyses, including a breakout of the proposed development traffic at the study area intersections, will not be available until mid-March.

Interstate Access Point Approval (IAPA) Process

Esther Strawder will be reviewing the IAPA report. She approved of the scenario of preparing the IAPA report strictly on the Selected Alternate, which will be determined approximately in May, allowing an IAPA report submission approximately in late June.

If you have any questions please feel free to contact me at Mlotz@wtbco.com.

cc: Attendees
File
Project Team

4/12/01

**SUMMARY OF I-270/WATKINS MILL ROAD PRESENTATION
BEFORE THE MONTGOMERY VILLAGE FOUNDATION ON
TUESDAY, FEBRUARY 6, 2001**

A presentation of the I-270/Watkins Mill Road project was made before the Transportation, Development and Public Facilities Committee of the Montgomery Village Foundation on Tuesday, February 6, 2001 at the North Creek Community Center in Gaithersburg. Mark Lotz (The Wilson T. Ballard Co.); Mona Sutton (SHA - Travel Forecasting); Bob Simpson (Montgomery County DPW&T); Dan Hardy and Nellie Maskal (M-NCPPC); and Eric Soter (City of Gaithersburg) represented the I-270/Watkins Mill Study Team. The Montgomery Village community requested this presentation and asked that it focus on how each alternate would impact traffic on Watkins Mill Road and Montgomery Village Avenue. Approximately 30-40 people were in attendance who were either members of the Committee or area residents.

Mark Lotz gave a brief PowerPoint presentation, which included the following:

- An overview of the travel forecasting process
- An overview of household and job growth in the MWCOG TAZ's surrounding the project area
- A review of the planned development in the immediate vicinity of the proposed Watkins Mill Road interchange (i.e., IBM, Casey, etc.)
- A review of the alternates
- A summary of ADT's, peak hour volumes and levels of service at ramps, links and intersections related to Watkins Mill Road and Montgomery Village Avenue

Following the presentation, an hour-long comment/question/answer period took place. Approximately 20-25 attendees provided comments and/or questions. All but one of the speakers was opposed to the interchange, many of which favored the No-Build over Alternate 6. One Montgomery Village resident strongly supports a full interchange to relieve area traffic. Opposition centered around the projected traffic growth on Watkins Mill Road, east of MD 355, in the vicinity of four public schools. The consensus was that a project that accommodates large developments and negatively impacts the Montgomery Village residents is not desirable. The perception is that the proposed development adjacent to I-270 is the driving force behind this project and is the source of projected traffic growth. The SHA representatives attempted to reinforce that a portion of the development will happen regardless of the development, in accordance with the Gaithersburg Master Plan. The study team, in response to comments from the Gaithersburg City Council, is currently performing additional analysis of the traffic projections to determine the amount of traffic contributed to the network from the proposed northern Gaithersburg developments versus the amount contributed by other growth in the County. The projections and levels of service for the No-Build alternate are also being reevaluated.

Detailed minutes of this meeting will be available from the Montgomery Village Foundation.



**Maryland Department of Transportation
State Highway Administration**

Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

4/5

MEMORANDUM

TO: Ms. Cynthia Simpson
Deputy Director
Office of Planning and
Preliminary Engineering

FROM: Mark D. Lotz
Project Manager for the
Project Planning Division *Jeremy L. Beck for*

DATE: March 2, 2001

SUBJECT: Project Number MO839B11
I-270/Watkins Mill Road Extended (WMRE) Study
Montgomery County

RE: January 25, 2001 Project Meeting with The U.S. Army Corps of Engineers

A meeting was held on Thursday, January 25, 2001 to discuss design and environmental issues associated with the subject interchange, as outlined in the letter from the U.S. Army Corps of Engineers (Corps) to SHA, dated January 16, 2001 and the corresponding response dated January 30, 2001. The following people were in attendance:

Jeremy Beck	SHA-PPD	410-545-8547
Steve Elinsky	Corps	410-962-6024
Anne Elrays	SHA-Environmental	410-545-8562
Michelle Hoffman	SHA-PPD	410-545-8547
Mark Lotz	The Wilson T. Ballard Co.	410-363-0150
Melinda Peters	SHA-HDD	410-545-8772
Glen Smith	SHA-RIPD	410-545-5675
Jeff Wolinski	Jeff Wolinski, Consult. Ecologist	410-329-2277
Jim Wynn	SHA-PPD	410-545-8530

The meeting began at 9:00 AM with brief introductions. The following is a summary of the topics discussed:

My telephone number is _____

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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

4/6/06

Design Issues

Given the serious environmental impact concerns regarding Alternate 2 registered by the Corp in their previous correspondence, as well as other issues such as cost, SHA is considering Alternate 3 to be the most likely preferred alternate at this point in the study. Alternate 3 was therefore the focus of this meeting's discussion.

Mark Lotz summarized some of the design issues of concern, which are primarily related to the proposed ramps that would be servicing southbound I-270 under Alternate 3. Alternate 3 calls for one new exit ramp off of southbound I-270 for Watkins Mill Road and modification of another exit ramp, further south, for MD 124. These are both projected to be high volume ramps (1,775 vehicles per hour (vph) to Watkins Mill Road and 2,075 vph to MD 124 in the a.m. peak) in close succession; therefore, gore spacing and deceleration lane length are a primary concern.

MD 124 Exit Ramp

The deceleration lane for the MD 124 ramp could, depending on its length, have lateral impacts to the Great Seneca Creek tributary running parallel to southbound I-270. The current design shows an 800-foot deceleration lane length, which is desirable to SHA, but would necessitate about 500 feet of stream relocation. The Corps opposes this stream relocation and suggested consideration of AASHTO minimum criteria of approximately 400-500 feet to minimize or avoid stream relocation. Melinda Peters stated that the reduced deceleration lane length would not be acceptable to SHA because of the high ramp volumes and speeds. The gore of the MD 124 exit ramp cannot be shifted further to the south because of the constraint caused by the braided entrance ramp from Watkins Mill Road to southbound I-270 crossing over the MD 124 exit ramp.

Mr. Elinsky then suggested cantilevering the lane out over the stream to avoid impacts. This would require a costly, complicated structure. As an alternative, a retaining wall was suggested. The retaining wall would be located under the jersey barrier, outside the floodplain. The Wilson T. Ballard Company (WTB) will further investigate the feasibility of constructing the retaining wall on the existing steep slope adjacent to I-270 and perform a study comparing the cost of the wall versus the combined cost of stream and utility relocations necessary if the wall were not built. Previous research has indicated that the 48-inch water main is estimated to cost \$600 per linear foot to relocate. Jeff Wolinski suggested \$150 per linear foot for stream relocation. In addition to constructibility, the wall will be evaluated in terms of both temporary and permanent impacts.

Gore Spacing

AASHTO requirements for successive exit ramps from an Interstate call for a minimum of 1,000 feet between gores. It was agreed that, given the high ramp volumes, 1,500 feet would be the desirable minimum gore spacing based on Highway Capacity Manual guidelines. Saed Rahwanji (SHA-OOTS) will be consulted regarding the gore spacing and deceleration lane length issue.

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Watkins Mill Road Exit Ramp

The location and design of the southbound I-270 exit ramp onto Watkins Mill Road, which must cross the Great Seneca Creek tributary at at least one location, has been the subject of extensive coordination with the Corps. Multiple alignments and stream crossing locations are possible with Alternate 3. Several were drawn up and reviewed. Generally the further north the departure from I-270, the greater the environmental impacts and impacts to the Game Preserve Road community, but the better the gore spacing. An alignment that would depart from the mainline at approximately the PEPCO right-of-way, and splits the difference between the northernmost and southernmost alignments seemed to have consensus as the best location. Such an alignment would cross the tributary at Reach 5, as designated by the Rosgen analysis, which is one of the better reaches in the study segment of the tributary. A 40 mph design speed would be necessary to avoid lateral impacts to the stream and impacts to wetland W-102 without retaining wall. Ms. Peters requested that a 50 mph design speed be used. It was decided to develop this ramp alignment in more detail, with costs at 50 mph design speed, and provide retaining walls as necessary to avoid the need for stream relocation at the elbow within Reach 7 and wetland W-102. A cost and impacts comparison will also be made to evaluate a bridge versus box culvert at the tributary crossing. SHA recognizes that they made a commitment to a bridge at this location previously in the study, but would like a full evaluation of both types of structures at this crossing. A cost and impacts comparison between bridge, retaining wall and stream relocation will also be performed at the Reach 7 stream elbow location.

In addition to the direction discussed above, follow-up concerning these issues will include discussion at the next project team meeting on January 26, 2001. A follow-up meeting to discuss the results of the above studies with the Corps is scheduled for February 28, 2001 at SHA Room 310 at 9:00 a.m. If you have any questions please feel free to contact me at 410-545-8547 or Mlotz@wtbco.com.

Attachments

cc: File (with attachments)
Project Team (attachments upon request)

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**THE WILSON T. BALLARD COMPANY
17 GWYNNS MILL COURT
OWINGS MILLS, MARYLAND 21117**

OFFICE MEMORANDUM

DATE TYPED: June 12, 2000

PROJECT: I-270 at Watkins Mill Road Extended

FILE: 100-225.01

SUBJECT: Meeting held on June 8, 2000 at M-NCPPC, Silver Spring, Maryland

PRESENT:

Mr. Ki Kim	M-NCPPC, Transportation
Ms. Jean Chait	Montgomery County, DPWT/OPD
Ms. Seekey Cacciatore	M-NCPPC
Ms. Nellie Maskal	M-NCPPC
Mr. Eric Soter	City of Gaithersburg
Mr. Mark Lotz	The Wilson T. Ballard Company
Mr. Jerry Karczeski	The Wilson T. Ballard Company

The purpose of the meeting was to obtain information concerning environmental resources, land use and development issues related to the project's secondary and cumulative effects analysis (SCEA). After a brief description of the project's SCEA boundary, time frame, SCEA resources and the Alternates Retained for Detailed Study (ARDS), a discussion followed which is summarized below:

- Ms. Cacciatore offered to produce mapping showing parklands and information regarding recent development in the SCEA boundary, including development in the pipeline. She requested a digital file of the SCEA boundary in Arcview format referenced to the 1983 Maryland State Coordinate System. The Wilson T. Ballard Company will provide the required digital file of the SCEA boundary.
- Mr. Soter requested a digital copy of the SCEA boundary in Arcview format.
- Ms. Maskal offered to provide information in the form of a summary description of the developments (name, type of development-residential or commercial, size, square footages, etc.) that are referenced in the aforementioned Arcview mapping. Additional environmental information for a particular development will be made available at M-NCPPC by requesting the development's file.
- M-NCPPC has a website, M-NCPPC.org, which contains population projections and other types of information that could possibly be useful in performing the project's SCEA.
- Mr. Soter offered to provide a copy of the summary of environmental impacts for the proposed development of the IBM property based on the preliminary plans submission.

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- Two M-NCPPC manuals, Environmental Guidelines (January, 2000) and Trees-Approved Technical Manual (September, 1992), were provided to The Wilson T. Ballard Company through Mr. Kim. The manuals provide information on the environmental management of development and the forest conservation program in Montgomery County, respectively.
- Ms. Chait stated that the Department of Permitting Services at Montgomery County Department of Public Works could provide information on the number of stream crossing permits issued. The contact person for this information is Mr. Daryl Porterfield (240-777-6351).
- Ms. Maskal agreed that the land use plans contained in the master plans for the SCEA area would provide a good representation of 2020 land use within the SCEA boundary.
- Mr. Soter offered to provide information, possibly a write-up, indicating what development could occur with the No-Build Alternate, what development is dependent on Alternate 6 which would provide Watkins Mill Road Extended over I-270 without interstate access, and what development is dependent on the construction of Watkins Mill Road Extended with an interchange at I-270 as provided in Alternates 2, 3 and 4. (It was agreed that the type of interchange or Access Option A, B, or C would not have a major influence on secondary development since the main factor to consider is whether or not there would be an interchange at I-270.)
- Ms. Cacciatore provided the name of a contact person at the U.S. Army Corps of Engineers, Ms. Marion Gall (410-962-5682), who could provide information about wetland permits issued.
- Mr. Kim stated that the portion of the Germantown and Vicinity planning area that is included within the SCEA boundary contains land that is either developed or approved for development and therefore, the development in this area is not dependent on the ARDS.

By Jerry Korlzeski/MDL

GEK/kld

cc: Attendees

Ms. Michelle Hoffman, SHA Project Planning Division

Ms. Anne Elrays, SHA Project Planning Division

File

FAX TRANSMITTAL SHEET

PARK PLANNING & DEVELOPMENT DIVISION

(301) 585-1921 fax

(301) 495-2535 tel.

DATE: <u>MAY 22, 2000</u>	
TO: <u>ANN ELRAYS</u>	FAX #: <u>410-209-5003</u>
FROM: <u>BILL GRAES</u>	PHONE #: <u>301-650-2861</u>
NUMBER OF PAGES, INCLUDING THIS ONE: <u>1</u>	
COMMENTS	
<u>PER YOUR REQUEST, TRANSMITTED ARE</u>	
<u>STAFF COMMENTS REGARDING THE SHA</u>	
<u>PROJECT @ I-270 AND WATKINS MILL ROAD</u>	
<u>(MIDDLEBROOK NEIGHBORHOOD CONSERVATION AREA)</u>	

As a result of a site visit with Wendy Hanley and Art Nelligan, area park managers, on May 4, 2000, Environmental Planning/Natural Resources staff has the following comments with regard to SHA's proposed acquisition of a portion of Middlebrook NCA.

The area delineated for acquisition by SHA is approximately 56,100 s.f. immediately adjacent to the existing I-270 right-of-way (ROW) and varies from apx. 50' to 150' wide. This acquisition is proposed as a part of Alternates 2 and 3 for improvements to Watkins Mill Road. As you stated, the park was acquired by dedication and therefore could be sold on "fee simple" basis to SHA. Due to these circumstances, staff would concur with the proposal.

The existing conditions of the area include a mature hardwood forest dominated by White and Chestnut Oaks and a tributary and headwater seep of Seneca Creek. Any disturbance to the tributary would be regulated and permitted through the state and the US Army COE.

Should this alternate be chosen in the future which would probably mean the clearing of all forest, Parks will have an additional opportunity to look at the park impacts as adjacent neighbors. And, should SHA require additional easements for construction or ROW, Parks will have a chance to look at mitigation at that time.

If you have any questions please call me at 301-495-4541.

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MEETING MINUTES

2988 Solomons Island Road
Edgewater, MD 21037
410-956-9000
410-956-0566 (Fax)

Date: 11/23/99
To: Attendees
From: David Raleigh Smith
Purpose: Watkins Mill Road Functional Assessment Review
Location: Metropolitan Grove Station, Gaithersburg
Attendees: Anne Elrays, SHA-PPD ✓
Bill Branch, SHA-EPD ✓
Steve Elinsky, USACOE ✓
Greg Golden, MD DNR ✓
Ray Li, USFWS ✓
Jean Chait, Montgomery County
Eileen Straughan, Straughan Environmental
George Fleagle, Wilson T. Ballard
David Raleigh Smith, CRI
Bridgette Grillo, CRI

The purpose of this meeting was to review the functional assessments performed for the Watkins Mill Road Interchange wetlands with the purpose of reaching interagency consensus on the derived values of these areas. CRI previously completed draft functional assessments of the wetlands using both the Evaluation for Planned Wetlands (EPW) and New England methodologies.

The attendees met at Metropolitan Grove Station at 9:30 a.m. on September 29, 1999. David Smith explained to the group that the Watkins Mill Road alignment spans wetlands that are part of a large riparian system that are broadly similar in plant composition and hydrogeomorphic setting. For this reason the functions for all of the forested wetlands were assessed as a single forested wetland and all emergent wetlands were assessed as a single emergent wetland. When this was carried out using the New England method no differences were observed in the principal functions for emergent or forested wetlands. Therefore, emergent and forested wetlands were combined into a single wetland assessment.

The attendees agreed to first walk the entire Watkins Mill Road alignment in order to familiarize everyone with this wetland system and then regroup to review the functional assessments. The group started at the northern end of the alignment, just south of the Pepco overhead transmission right-of-way. Greg Golden of MD DNR asked about an apparent cleared area along the waterway

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that was evident on an aerial photograph taken from the early 1990s. George Fleagle explained that there was both a water and sewer line that parallels the stream corridor and crosses the main stem within the proposed Watkins Mill Road Interchange. The utility alignment has not been maintained recently, as evidenced by 20-foot-tall saplings growing within the formerly cleared area.

The initial discussion centered on the proposed interchange alignment with respect to the existing wetland and waterway boundaries. George Fleagle, of Wilson T. Ballard, explained that the proposed southbound ramp to Watkins Mill Road crosses the intermittent stream (Transitway Wetland 102) that drains east to the main stem from the vicinity of the Metropolitan Grove Marc Station. The ramp would continue through the uplands west of the wetland system. Bill Branch stated that a 50-75' buffer should be maintained from the ramp's limit of disturbance to the wetland in order to minimize right of way requirements. George Fleagle also discussed the relocation of 600 feet of the main stem (wetland B63W) as part of alternates considering a collector-distributor road adjacent to southbound I-270.

As the group reached the largest portion of the forested wetland (B63W), several concerns about protecting this area were expressed. George Fleagle explained that the Watkins Mill Road Extended bridge would be 600' in length and would span the extensive forested wetland associated with wetland B63W. Steve Elinsky of USACOE proposed moving the bridge south over the incised portion of the wetland in an attempt to reduce the impacts to this system.

The field assessment ended at a small forested wetland swale located south of the larger system, and included an intermittent, riprap-lined stream that drains a stormwater management pond east of I-270. The attendees decided that it was not necessary to walk the rest of the alignment, as the wetlands are very similar in vegetation composition and hydrogeomorphic setting. In the original wetland delineation of the Watkins Mill Road alignment, a much larger study area was assumed. However, after reviewing the plans presented by George Fleagle it became apparent that the southern portion of the wetland system is located outside of the limits of disturbance for the preliminary alternates. This modification does not discount any of the functional assessments associated with the system because the planning process is still ongoing.

After viewing the wetlands within the proposed Watkins Mill alignment, the group reviewed the proposed alignment alternatives presented by George Fleagle. Following this discussion, the group reviewed the draft functional assessments completed by CRI. Steve Elinsky commented that the overall score seemed low for the wildlife functions involved in the EPW method. The group reevaluated each question and altered a few of the individual scores associated with this function. The results were only slightly higher than the initial overall score assigned to this function. While the EPW assessment for the wildlife function only ranked an intermediate score, the team agreed that wildlife habitat was a principal function of the site. David Smith explained that the EPW method acts as a guideline during the mitigation process, during which the wildlife function for the planned wetland can be increased by adding certain wildlife attractors to the design of a wetland.

Mr. Elinsky was concerned that neither groundwater recharge/discharge and floodflow alteration were included as principal functions using the New England method. He commented that groundwater is the main source of hydrology for the Watkins Mill wetland system. During the

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field review, signs of groundwater discharge were present and were providing a base flow to the perennial and intermittent streams within the system. The group agreed that these reasons support the need to make groundwater discharge/recharge a principal function. The floodflow alteration function was also determined to be a principal function because the forested riparian buffer associated with the stream slows the flow velocities during flooding, therefore, reducing flood damage. Recently deposited drift lines and debris within the riparian zone of the stream were observed during the field review.

Greg Golden felt that nutrient removal is a function being provided by the wetland system, and was concerned that it did not show up as occurring using the New England method. The list of qualifiers for this function were reviewed and a few were added. The additional qualifiers increased the total so that at least half of the qualifiers were observed, making nutrient removal an occurrence within the wetland.

The group also wanted to review the uniqueness/heritage function in both the EPW and New England methods. Furthermore, this area should not be considered parkland when evaluating the uniqueness/heritage function. The New England method assesses the function based on the effectiveness of the wetland to provide habitat for various types of animals typically associated with wetlands, not whether the area is a designated park. In comparison, the EPW method considers the rarity of the wetland and any other unique features. Using EPW, most of the elements were not applicable to the site, however, the element that relates to a wetland's connection to wild and scenic rivers does apply. The Watkins Mill wetland system drains to the Montgomery County portion of the Potomac River, which is a State-designated scenic river. Therefore, the uniqueness/heritage function still applies.

CRI agreed to make the necessary changes to the functional assessment data sheets and insert them into the wetland delineation report being prepared. If there are any changes or corrections to these minutes please submit them to me as soon as possible. A final copy will be distributed once all the edits are made.

cc: Attendees



2988 Solomons Island Road
Edgewater, MD 21037
410-956-9000
410-956-0566 (Fax)

MEETING MINUTES

Date: July 9, 1999

To: Anne Elrays

From: David Raleigh Smith

Subject: I-270 Transitway from Shady Grove Metro Station to Comsat, Watkins Mill Road Interchange, MD 75 Extended
Project No. FR 192B11

Purpose: Wetland Jurisdiction Determination

JD Date: July 7-8, 1999

Location: Metropolitan Grove Station, Montgomery County

Attendees: Anne Elrays, MSHA-PPD
Bill Branch, MSHA-EPD
Melissa Kosenak, MSHA-PPD
Steve Elinsky, USACOE
Joseph DaVia, USACOE
Bill Seiger, MDE
Matt Radcliffe, MDE
George Fleagle, Wilson T. Ballard
David Raleigh Smith, CRI
Bridgette Grillo, CRI

The purpose of the meeting was to conduct a jurisdictional determination (JD) on remaining wetlands associated with the I-270 project. The JD included the proposed Transitway from Shady Grove Metro Station to Comsat, MD 75 Extended, and Watkins Mill Road Extended. Coastal Resources, Inc. identified and flagged seventeen wetlands within the alignment of the Transitway. For the proposed Watkins Mill Road interchange, wetland flagging was extended along two streams that are tributaries of Great Seneca Creek. Portions of these stream systems were flagged within the Transitway alignment and I-270 corridor. The field review was completed in two days.

The attendees met at the Metropolitan Grove Station at 10:00 a.m. on July 6, 1999 and at 9:30 a.m. on July 8, 1999. On both days the group split into two teams. Each team was comprised of one ACOE and one MDE representative, with at least one consultant from CRI. On July 6, 1999, each team had at least one representative from MSHA. A single representative from MSHA was present during the subsequent visit. On the first day, George Fleagle of Wilson T. Ballard addressed questions regarding the design and engineering of the Watkins Mill Road interchange. It was reiterated that the project is in a preliminary design stage. Steve Elinsky of the COE expressed concern that the proposed interchange was located within an area with considerable wetlands of potentially high quality. To obtain an assessment of wetland functions and values, Mr. Elinsky requested that CRI complete the functional

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assessment of the Watkins Mill Road interchange wetlands using the EPW method, as has been done for the rest of the I-270 project. However, he would like CRI to supplement this information by also completing an assessment of these wetlands using the New England method. Mr. Elinsky also suggested that an interagency field meeting be held to review the functional assessment results and reach consensus on the value of the Watkins Mill Road interchange wetlands. He indicated that he would take the lead on contacting the U. S. Fish and Wildlife Service, Maryland Department of Natural Resources and other interested agencies and would try to schedule the meeting sometime this summer. CRI agreed to complete the functional assessments by July 31, 1999. The following information summarizes the wetland JD results of both teams for Transitway wetlands 1-17 and Watkins Mill Road wetlands 102, 105, and B63W.

Transitway

For the Transitway wetlands, it was noted that the 17 wetlands were renumbered from the original flagging for convenience. The new wetland numbers correspond to wetland numbers on the flagging as follows: 1 = 100, 2 = 101, 3 = 103, 4 = 104, 5 = 105, 6 = 102, 7 = 106, 8 = 107, 9 = 108, 10 = 109, 11 = 156, 12 = 155, 13 = 154, 14 = 153, 15 = 152, 16 = 151, 17 = 150.

Wetland 1	Accepted as flagged.
Wetland 2	Accepted as flagged.
Wetland 3	Flag 103-2B was moved downslope about 12'. Flags 103-8A to 103-11A were missing. Flags 103-8A and 103-11A were retied and should connect to one another. The remainder of the wetland flags were accepted as flagged.
Wetland 4	Accepted as flagged.
Wetland 5	Wetland 5 is located along a tributary of Great Seneca Creek and was accepted as flagged. The agencies noted that the Transitway alignment crosses this portion of the stream.
Wetland 6	Wetland 6 is part of the same wetland system as Wetland 5 and was accepted as flagged. The agencies noted that the Transitway alignment spans the entire stream valley of Wetland 6 and shifting the alignment would protect the hydrology of this area. The agencies and George Fleagle of Wilson T. Ballard discussed an alternative to the proposed Transitway, which entails moving the alignment north of the stream and into the adjacent uplands. The alternate alignment would extend south to the west side of Wetland B63W and join I-270 south of Browns Station Park. The COE suggested that if a rail line is proposed for the Transitway alignment that it should parallel the Marc Line to avoid Wetlands 6, 102, and B63W.
Wetland 7	Accepted as flagged.

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- Wetland 8 Flags W8-3A through W8-5A were moved approximately fifteen feet west from their original location along the stream. This area was broadened in order to include a narrow floodplain wetland. The remainder of the wetland flagging was accepted by the agencies.
- Wetland 9 Accepted as flagged.
- Wetland 10 Accepted as flagged.
- Wetland 11 Moved flags 156-18 and 156-19 back to the stream channel, as the floodplain in this vicinity was determined to be dry. It was noted by both MDE and COE that the forested area west of the stream and floodplain was wetland, but is currently outside the proposed Transitway alignment. New flags 156-20 to 156-23 were tied along the west side of the stream. Flag 156-23 should connect to flag 156-0 at the culvert beneath Muddy Branch Road.
- Wetland 12 Accepted as flagged.
- Wetland 13 Accepted as flagged.
- Wetland 14 Retied missing flag 153-1 and added a flag (153-1.5) between 153-1 and 153-2. Moved flags 153-5 and 153-6 down the swale about 25'. The remainder of the wetland was accepted as flagged.
- Wetland 15 The COE and MDE classified the downstream portion of the wetland (between flags 152-10 and 152-14) as riverine (waterway) only. The upstream portion includes palustrine forested habitat. The agencies noted that the stream is presently being diverted through twin 18" corrugated plastic pipes for an apparent temporary stream crossing. The original channel on the downstream side was dry between the crossing and the temporary outfall further downstream.
- Wetland 16 The riprap stream channel on the downstream side of the culvert was not flagged. This area should be shown on mapping as waters of the U. S. by surveying the top of bank along the stream out to the Transitway study limits. The agencies concurred that the vegetated stream channel on the upstream side of the culvert should be labeled as a waterway only (R2UB).
- Wetland 17 Accepted as flagged.

Watkins Mill Road Interchange

- Wetland 102 This wetland is an extension of flagging for Wetland 6. This area was verified as flagged. Bill Branch of MSHA suggested protecting this system (both Wetland 6 and Wetland 102) by retaining the forested buffer associated with the stream. All agencies suggested that an alternative for the Transitway should include avoiding this system.
- Wetland 105 Wetland 105 is an extension of flagging for Wetland 5. This area was verified as flagged.

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Wetland B63W

A jurisdictional determination has previously been performed on the portion of the wetland that extends from the end of the flagging for Wetland 105 until it crosses proposed Watkins Mill Road extended. At this point, the flagging resumes for Wetland B63W and incorporates several vegetated and riverine wetlands. Flags B63W-103 through B63W-105 were moved approximately 25 feet to the edge of the swale due to the lack of hydric soil indicators. The remainder of the wetland flagging for Wetland B63W was accepted as flagged. Bill Branch suggested maintaining the forested riparian buffer that already exists along this system by acquiring an easement that would prevent further development of this area. He also commented that the establishment of this buffer could serve as a riparian corridor between Great Seneca Creek and Brown's Station Park. George Fleagle discussed a bridge that would span Wetland B63W with potential ramps to I-270. Steve Elinsky of the COE suggested that the bridge needs to be high enough to allow clearance for the forested buffer. Bill Branch commented that the pillars for the wetland need to be strategically placed in order to minimize impacts. The COE did not agree with the location of the interchange and would like to see viable alternatives to avoid impacting Wetland B63W. Issues pertaining to the Marc Station were discussed, as the Corps would like to see the Marc Station relocated to Brown Stations Park.

MD 75 Extended

No wetlands were identified within the study area for the MD 75 extended alignment. The COE indicated that if the highway alignment were to shift north in the vicinity of the rubble land fill west of MD 355, MSHA would need to delineate the instream stormwater management pond and stream. These wetlands are presently outside the study area for MD 75 extended.

These minutes are in draft form and are being submitted to MSHA for review and comment.



**Maryland Department of Transportation
State Highway Administration**

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Parris N. Glendening
Governor

John D. Porcari
Secretary

Parker F. Williams
Administrator

MEMORANDUM

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

FROM: Michelle D. Hoffman
Project Manager *Michelle D. Hoffman*
Project Planning Division

DATE: June 24, 1999

SUBJECT: June 11 Interagency Meeting and Field Review

RE: Project Number MO839A11
I-270/Watkins Mill Road Extended
Montgomery County

On Friday, June 11, 1999, several representatives of the Project Team met to discuss issues related to the project Purpose and Need Statement. In particular, the discussion focused on the Segmentation Paper and the Purpose and Need Statement. The following people attended:

Jeremy Beck, SHA-PPD
Peter Campanides, SHA-D3
Jean Chait, Mont. Co. DPW&T
Jon B. Chamberlin, SHA-D3 R/W
Andrew Der, MDE
Steve Elinsky, USACE
Anne Elrays, SHA-PPD
Greg Golden, DNR-Env. Res.
Michelle Hoffman, SHA-PPD
Ki Kim, M-NCPPC

Melissa Kosenak, SHA-PPD
Mark Lotz, The Wilson T. Ballard Co.
Glenn Mlaker, City of Gaithersburg
Dan Putman, SHA-Plats & Surveys
Jamie Stark, EPA
Pam Stephenson, FHWA
Matt Storck, STV for SHA-D3
Paul Wettlaufer, USACE
David Sutherland, USFWS
Bihui Xu, MOP

My telephone number is _____

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INTRODUCTION

Michelle Hoffman began the meeting with introductions and an overview of the purpose of the meeting, which included a field review for the purpose of understanding the proposed project study area and the purpose and need issues, followed by discussions of the Purpose and Need Statement and the environmental streamlining process.

Prior to beginning the field review, Michelle provided a brief overview of the project. This planning study will follow a "pilot" process for environmental streamlining. An interagency committee that holds regular meetings is developing the framework for this process. The committee suggested this purpose and need interagency field review as one of its first revisions to the traditional process.

Recent interagency involvement on the project has included the following:

- March 17, 1999: Draft Purpose and Need Statement first distributed
- April 21, 1999: Purpose and Need Statement discussed and need for Segmentation Paper identified
- May 9, 1999: Draft Segmentation Paper first distributed
- May 28, 1999: Latest revision of the Purpose and Need Statement and Segmentation Paper distributed (This represents the latest version except for deletion of references to "proper segmentation" on the first and last pages of the Segmentation Paper.)

The purpose of this meeting was not to request concurrence on purpose and need. This request will formally occur at the June 16, 1999 Interagency Meeting. Andrew Der stated that all agencies have not concurred on segmentation (i.e., I-270 at Watkins Mill Road separated from the I-270/US 15 Multi-Modal Corridor Study). Concerns regarding segmentation could be further addressed at the June 16th Interagency Meeting, if desired.

FIELD REVIEW

The field review lasted approximately two hours and included a drive along northbound I-270 to Middlebrook Road, MD 355 south, Watkins Mill Road at MD 355, the IBM property, westbound MD 124, northbound MD 117, Brown's Station Park, the Metropolitan Grove MARC Station, Watkins Mill Road at MD 117, Game Preserve Road and southbound I-270. Several stops were made along the way.

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The following is a summary of discussions that took place during the field review:

- Glenn Mlaker gave an overview of the development planned on each side of I-270. East of I-270, south of the master plan location of Watkins Mill Road Extended, the IBM property is planned for the removal of its ball fields and part of its parking lot followed by construction of 1.1 million square feet of office/research space, including a multiplex theater and a hotel. Following the development of conceptual alternatives, IBM will be provided a worst case right-of-way line to allow them to plan their development. Also east of I-270, but north of the master plan alignment for Watkins Mill Road Extended, the Casey East Tract is planned for 600,000 square feet of office/research space. Included in the plans for this area is the extension of Professional Drive to loop back to the east to intersect MD 355 at an additional location south of its current intersection. West of I-270, the parcel known as the Casey West Tract covers both sides of the master plan location for Watkins Mill Road Extended. The development planned for this parcel includes 1.7 million square feet of office/research space and 1,500 residential units.
- Other development proposals related directly to the project purpose and need include the Bennington Corporation's redevelopment of a parcel in the northeast quadrant of MD 117/Watkins Mill Road to provide 800,000 square feet of additional office/research space and the Metropolitan Grove Park re-development to create 400,000 square feet of additional office/research space. Both of these areas are currently under construction.
- Conceptual plans for several of the above developments were reviewed along with conceptual plans for a proposed Watkins Mill Road Extended interchange with I-270, developed several years ago as part of a County Feasibility Study, which is referenced in the Purpose and Need Statement.
- Jean Chait reported that prior to developing a feasibility study for a Watkins Mill Road Extended interchange with I-270, Montgomery County completed 90 percent design plans for Watkins Mill Road Extended between MD 117 and MD 355 solely as an overpass of I-270. This included the submission of a wetland permit application to the US Army Corps of Engineers. This application was dated May 21, 1992, and included 0.5 acre of impact, based on a delineation verified in August, 1990. The application was also submitted to MDE which provided comments back to Montgomery County which were never responded to, and the file was therefore closed. The Corps permit has since expired because it was a Maryland General Permit. The JD associated with the permit has expired also, but may still be used as a reference for this study.

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- Brown's Station Park is a publicly owned (joint County/City) parcel acquired as part of a land swap included as part of a highway project several years ago. The parcel is not currently used nor is it planned for any active or passive recreational uses. It is zoned mixed-use and not planned for inclusion in the parks and recreation system. Pending additional research related to funding sources for the acquisition of the property, it appears that this land does not qualify as a Section 4(f) resource.
- David Sutherland requested information concerning the total amount of woodland within the study area.
- The Metropolitan Grove MARC Station was included as a stop on the field review. The parking lot was less than half full which is considered to be typical every day use of this location. Parking lots at adjacent stations on the MARC line are known to be much more heavily utilized, which has led to the theory that poor accessibility and congestion on the surrounding road network leads to under-utilization of this station. Access to this station off of I-270 requires five-to-six turns through intersections that are heavily congested at rush hour. One of the detailed alternates in the I-270/US 15 Multi-Modal study is the Corridor Cities Transitway, parallel to I-270, which includes shared use of this MARC Station. The extent to which poor accessibility contributes to low MARC station utilization was questioned by several attendees. Michelle will contact MTA to gather more data on utilization (please see the revised Purpose and Need Statement). Steve Elinsky and Peter Campanides suggested moving the station to the Brown's Station Park location, which could be more easily accessed from the MD 124 interchange. Michelle stated that this could be considered when conceptual alternatives are developed.
- Paul Wettlaufer suggested consideration of extending Long Draft Road east of MD 117 as the east-west connector across to MD 355 rather than Watkins Mill Road because it may have fewer wetland impacts. From brief inspection in the field, it appeared that an extension of Long Draft Road east of MD 117 would result in extensive impacts to residential communities; however, this concept could also be identified during the alternates scoping process.
- Some potential conceptual designs were discussed at the request of the Corps of Engineers, including the use of braided ramps along southbound I-270 which would provide a grade separation for southbound traffic from Watkins Mill Road Extended to cross over traffic exiting onto MD 124, thereby averting the weaving of high volumes of exiting and merging traffic on the I-270 mainline or future collector-distributor (C-D) roads. C-D roads will likely be considered along both northbound and southbound I-270. Paul Wettlaufer requested a commitment that would result in no widening to the west side of I-270. Michelle responded that such a commitment could not be made since build traffic volumes and conceptual alternates have not yet even been determined.

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OFFICE MEETING

Following the field review, discussion of purpose and need issues continued back at the Montgomery County Executive Office Building. Discussion included the following:

Project History

Michelle highlighted key points in the history of the project:

- The I-270/US 15 Corridor Study has included the Watkins Mill Road interchange in conceptual form.
- Independently from the I-270/US 15 Corridor Study, Montgomery County developed 90% design plans for a Watkins Mill Road connection between MD 117 and MD 355, without an I-270 interchange, as designated in the Northern Gaithersburg Area Montgomery County Master Plan. Wetland permit applications were submitted to the Corps of Engineers and MDE, but subsequently lapsed since the County did not pursue the project.
- Montgomery County and the City of Gaithersburg jointly conducted a feasibility study for an I-270 interchange with Watkins Mill Road Extended.
- The interchange was placed on the City of Gaithersburg Master Plan.
- The study was added to the CTP.
- SHA initiated the I-270/Watkins Mill Road Extended study in early 1999 at the request of the City and County.

Study Area Boundary

The study area boundary should be increased slightly to include the following:

- The MD 355/MD 124 intersection.
- The MD 355/Professional Drive intersection.
- Several hundred feet of Watkins Mill Road, east of MD 355.
- The Great Seneca Creek crossing of I-270.

Agency members requested that the boundary for Secondary and Cumulative Effects Analysis include portions of Montgomery Village.

Segmentation

- Paul Wettlaufer acknowledged that the Corps has signed-off on the decision to separate this project from the I-270 Corridor Study; however, he expressed concern that the two studies be carefully coordinated to avoid wasted construction (i.e., C-D roads or ramps that are built for Watkins Mill and need to be removed/relocated later for the corridor improvements). The Watkins Mill study should be performed with worst case mainline scenario.

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- Andrew Der's concerns over segmentation will be discussed at the June 16 interagency meeting once he has spoken with Elder Ghigiarelli.

Environmental Overview

Anne Elrays summarized the environmental assessment that has been completed for the project:

- DNR/Fish & Wildlife coordination has been completed, indicating no rare, threatened or endangered species in the Study Area.
- There are no anadromous fish in the Study Area.
- Portions of the Study Area have been taken through the wetland JD process. The remainder of the Study Area will be covered as part the wetland JD to be completed on July 7-9 as part of the I-270/US 15 Corridor Study. Wetland delineations, flagging and functional assessment will be completed prior to this field review.
- Historic resources consist only of one Maryland inventory site--the William Caulfield House.
- Phase I archeology will need to be performed on the west side of I-270 in the Study Area. The east side of I-270 is much more extensively developed, but some Phase I will still be necessary.
- Although all streams are currently considered Use I, Greg Golden stated that Use IV should probably be assumed for Great Seneca Creek and its tributaries since it is a stocked trout stream. The process to officially reclassify the streams will take some time, but is likely underway.

Miscellaneous Issues

- A possible inconsistency was noted in the Purpose and Need Statement's forecast of 6,920 additional residents in the Study Area based on 1,500 new residential units (4.6 persons per household seems high).
- There was inquiry concerning the status of M-83. M-83, the Mid-County Highway, is a planned major highway parallel and to the east of MD 355. It remains in the County Master Plan, but it is not in the CLRP and no work is currently being pursued.
- Several agency members requested that local intersection improvements be included in the scope of alternatives considered, if needed.

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- The Purpose and Need should more clearly state what development in the area is directly dependent upon I-270 access enhancements to be built. Glenn Mlaker has previously reported that all proposed development in the area (listed above) can proceed independent of access improvements except for 800,000 SF of commercial space and 650 residences. Perhaps this can be expressed as a percentage of the total planned development (please refer to the revised Purpose and Need Statement).
- Minor changes were proposed to the Draft Concurrence Form for Project Purpose and Need to be distributed at the June 16 Interagency Meeting. Sentences in the Project Needs section should read as follows: "Improved access to *mass transit* is needed..."; and "The planned economic development will overload the existing *local* transportation network."

FOLLOW-UP ITEMS/ADDITIONAL INFORMATION

- Any major changes that agency members believe are needed to the Purpose and Need, Segmentation or Concurrence documents should be faxed to Michelle by June 14th. A 15-day concurrence period will be requested at the Interagency Meeting on June 16th.
- If Purpose and Need issues can be resolved, the July 21 Interagency Meeting will be used to scope preliminary alternates.
- A field review will be held in July to continue the alternates scoping and walk the riparian corridor parallel to I-270.
- In a conversation with Bill Branch (SHA Environmental Programs) held subsequent to the June 11th meeting, it was determined that SHA acquired 1.0 acre of land for the purpose of mitigating the 0.5 acre impact that would have resulted from the County's Watkins Mill Road Extended project. This mitigation site remains available for use with this project.

This summarizes the discussion of topics at the June 11, 1999 Interagency Review Meeting. If you have any questions or comments, please advise Michelle Hoffman, the Project Manager at 410-545-8547, or Anne Elrays, the Environmental Manager, at 410-545-8562. Both of them can be reached at 1-800-548-5026.

cc: Mr. Neil J. Pedersen
File
Attendees
Project Team



2988 Solomons Island Road
Edgewater, MD 21037
410-956-9000
410-956-0566 (Fax)

MEETING MINUTES

Date: November 10, 1998
To: Anne Elrays
From: David Raleigh Smith
Subject: Interstate 270 from Shady Grove Metro Station to Biggs Ford Road
Project No. FR 192B11
Purpose: Wetland Jurisdiction Determination
JD Date: October 22-23 and November 4 and 10, 1998
Location: Urbana Park and Ride, Frederick County
Attendees: Anne Elrays, SHA-PPD
Bill Branch, SHA-EPD
Peter Keke, SHA-PPD
Julia Dietz, SHA-PPD
Steve Elinsky, USACOE
Joseph DaVia, USACOE
Rich Bulavinetz, USACOE
Bill Seiger, MDE
Matt Radcliffe, MDE
David Raleigh Smith, CRI
Ricardo Gonzales, CRI
Bridgette Grillo, CRI

The purpose of the meeting was to conduct a jurisdictional determination (JD) on the southern half of the I-270 project from MD 80 (Urbana) to Shady Grove Road. Forty-six wetlands were identified and flagged within the southern half of the project study area by Coastal Resources, Inc. It was agreed that the project study area be reduced for the southern portion of the I-270 corridor, to include from the edge of pavement on either side of the interstate out to the proposed right-of-way (ROW). This area averaged about 50 feet in width. It also included expanded areas in the vicinity of proposed new interchanges at MD 75 extended, New Cut Road, and Watkins Mill Road. The field review was completed in three days.

The attendees met at the Urbana Park and Ride at 9:00 a.m. on all three days. On the first day, questions regarding project scope, design, and engineering were addressed by Anne Elrays, Peter Keke, and Julia Dietz of MDSHA. It was reiterated that the project is in a preliminary stage. The ACOE also reiterated that alternatives utilize the median where practical, rather than expanding beyond existing ROW and that side slopes be maximized to further reduce impacts to wetlands and streams. The ACOE also noted that the wetland JD would only be valid to the proposed ROW. If it is later necessary to expand the project beyond the proposed ROW, additional wetlands would need to be flagged and verified. Anne

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Elrays of MDSHA noted that upon completion, a copy of the wetland delineation and report should be sent to the National Park Service for wetlands south of Biggs Ford Road to Urbana. On all three days the group split into two teams. Each team was comprised of one ACOE and one MDE representative, with at least one consultant from CRI. On October 22, each team had at least one representative from MDSHA. A single representative from MDSHA was present during the subsequent visits. The following information summarizes the wetland JD results of both teams, for Wetland 6, 10, and 22-66.

- Wetland 6E & 6W Wetland 6W was accepted as Waters of the U.S. A note was made regarding the lack of fish passage below the culvert, as there is a 3' drop from the culvert outfall to the stream. Wetland 6E was accepted as flagged.
- Wetland 10 Wetland 10 was determined to be ephemeral and was not taken as Waters of the U.S.
- Wetland 22E & 22W The Wetland 22W boundary was accepted as flagged. However, the agencies indicated that both sides of the stream should be surveyed between flags 17 and 53. A note will be made to the surveyors to survey the top of bank on the west side of the stream in this location. A small tributary stream enters the main stream from the west between flags 44 and 45. Surveyors should also locate the top of bank of this tributary upstream approximately 30 feet. The agencies identified a seep wetland adjacent to the stream opposite flag 51 to 53. The seep is outside the ROW, however, if the alignment changes the seep will need to be flagged. The culvert at flag 28 is 4' above the water surface, excluding fish passage. Wetland 22E was verified as flagged.
- Wetland 23E & 23W Wetland 23W and 23E were accepted as flagged.
- Wetland 24E & 24W Wetland 24 (Bennett Creek) was accepted as flagged. Bill Branch of MdSHA noted that the vegetated bar under the I-270 bridge provides good wildlife passage.
- Wetland 25E & 25W Wetland 25W was accepted as flagged. A 10-12" drop from the culvert to the water surface was acting as a blockage to fish passage. A vehicle was observed driving through the box culvert, raising a question about ROW issues. Within the PEM portion of Wetland 25E, flags 25E-26 through 25E-37 and flag 25E-39 were removed. The wetland boundary was tightened so that flag 25E-25 connects to 25E-38 and 25E-38 connects to 25E-40. Along the stream portion of Wetland 25E, flags 25E-2 and 25E-3 were removed. This area was considered to be road runoff only. A new flag 25E-2 was tied on the perennial portion of the stream opposite flag 25E-4.
- Wetland 26E & 26W The portion of Wetland A26W flagged as PFO was considered non-wetland by the agencies. The stream channel was re-flagged A26W-1 to A26W-6. The area identified as intermittent stream of Wetland B26W was determined to be ephemeral road runoff. The perennial stream was re-flagged B26W-1 to B26W-7. Bill Branch noted that the ephemeral channel and pipe outfall from the median were failing and in need of repair. Fish passage was blocked at the I-270 culvert by a 2-3' drop to the water surface. Wetland 26E was accepted as flagged. Several missing flags were retied. An approximately 50' X 150' emergent seep connects to the stream just outside the ROW. The area is enclosed in an electric fence and was not flagged. If the alignment extends out in this location, the area will need to be flagged and verified.
- Wetland 27E & 27W Wetland flags 27E-13 to 27E-27 were removed. Connect flags 27E-12 to 27E-26. Flag 27E-11 was moved approximately 8' further away from the stream. Wetland 27W was accepted as flagged.
- Wetland 28 The channel was determined to be non-jurisdictional. Nontidal emergent wetlands were identified along the fringe of the pond out to about 8'. A note will be made to the survey team to survey the edge of pond and locate a wetland line 8' from the edge.
- Wetland 29 The waterway was not determined to be jurisdictional. The emergent wetland was re-flagged as 29W-1 to 29W-6. The wetland connects downstream and outside the ROW to an intermittent stream channel.

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Wetland 30 Flags 30W-1 to 30W-6 were removed along a small stream channel determined to be ephemeral by the agencies. The perennial stream and PFO were verified as flagged (30W-7 to 30W-16). The box culvert drops 6" to the water surface of the stream creating a blockage to fish passage.

Wetland 31 Wetland flags 31W-17 and 31W-18 were removed, as the agencies did not take jurisdiction on the channel. The verified boundary includes flags 31W-1 to 31W-16 and 31W-19 to 31W-25. The culvert is undercut and water drops 3' to the stream, creating a blockage to fish passage.

Wetland 32E & 32W This stream channel was considered to be ephemeral and was not determined to be jurisdictional.

Wetland 33 The Corps verified all flags associated with wetland 33.

Wetland 34 Wetland 34 is associated with Little Bennett Creek. Flagging was verified. Bill Branch noted that the existing bridge allows good wildlife passage.

Wetland A35 This wetland was verified as flagged.

Wetland B35 This stream was determined to be ephemeral and non-jurisdictional.

Wetland C35 This wetland was verified as flagged.

Wetland D35 This wetland was verified as flagged.

Wetland E35 Wetland flags E35-62.1S to E35-62.5S were removed. The new boundary connects E35-62 to E35-63. Wetland flags E35-102N to E35-108N were moved. The new boundary connects flags E35-101N to E35-109N. Wetland flags E35-116N to E35-119N were removed. The new boundary connects flags E35-115N to E35-120N. The remainder of the wetland flagging was accepted by the agencies.

Wetland F35 This wetland was verified as flagged.

Wetland G35 This wetland was verified as flagged.

Wetland H35 This wetland was verified as flagged.

Wetland 36 Wetland 36 was accepted as flagged.

Wetland 37 This roadside ditch was determined to be non-jurisdictional; hydrology supported by road runoff.

Wetland 38 This wetland was verified as flagged.

Wetland 39 This wetland was verified as flagged.

Wetland 40 This stream channel was considered ephemeral and non-jurisdictional.

Wetland 41 This wetland was verified as flagged.

Wetland 42 This wetland was verified as flagged.

Wetland 43 This wetland was verified as flagged.

Wetland 44 This wetland was verified as flagged.

Wetland 45E & 45W Wetland 45E was verified as flagged. Wetland flags 45W-2 and 45W-3 were moved to the top of bank. The remaining flags were accepted as flagged.

Wetland 46E This wetland was verified as flagged. The agencies noted fish in the stream. If impacts are planned for the this wetland, the agencies would like to see deeper pools created in the stream for fish.

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Wetland A46E	This wetland was verified as flagged.
Wetland B46E	This stream channel was determined to be ephemeral and non-jurisdictional. The agencies noted a wetland just outside the ROW. If the alignment expands in this area, the wetland would need to be flagged.
Wetland 47	This wetland was verified as flagged.
Wetland 48E & 48W	Wetland 48W was accepted as flagged. Wetland 48E was accepted as flagged. However, the agencies noted that the stream channel flows out of an instream pond.
Wetland 49	Wetland 49 was accepted as flagged up through flags 49W-00 to 49W-69 and from 49W-150 to 49W-197. Wetland flags 49W-70 to 49W-149 were outside of the proposed ROW and were not assessed at this time. It was noted that the wetland was actually flagged as Wetland 47W by mistake. A note will be made to the surveyors prior to the location of these flag points.
Wetland 50	This wetland was verified as flagged. MDE noted that it would be difficult to relocate the stream in this location.
Wetland 51	This wetland was verified as flagged. ACOE does not want to see the stream piped if impacts can not be avoided.
Wetland 52E & 52W	Wetland 52E and 52W were accepted as flagged.
Wetland 53	This wetland was verified as flagged.
Wetland 54	Wetland 54 was accepted as flagged.
Wetland 55	Wetland 55 was accepted as flagged.
Wetland 56	Wetland 56 was accepted as flagged. The eastern boundary of the wetland was not flagged, as it lies just outside the ROW. If the alignment expands in this location, the wetland boundary east of the stream will need to be flagged.
Wetland 57E & 57W	Wetland 57E was accepted as flagged. This wetland is associated with the Germantown Bog, a Nontidal Wetland of Special State Concern. None of the three state-listed plant species were observed during our delineation or JD. Wetland 57W was also accepted as flagged.
Wetland 58E & 58W	Wetland 58E and 58W were accepted as flagged.
Wetland 59E & 59W	The agencies did not take jurisdiction on Wetland 59E, indicating that it was an ephemeral stream channel. Wetland 59W was accepted as flagged.
Wetland 60E, 60W & 60N	Wetland 60E was accepted as flagged. The ACOE noted that the unflagged, created wetland east of Wetland 60E would need to be replaced if impacted. CRI and MDSHA will look into this mitigation site so that its limits can be located on the mapping. Wetland 60W was accepted as flagged. The ACOE noted that a forested wetland extends upslope from the stream, but just outside of the ROW. If the alignment is extended in this area, the PFO will need to be flagged. Wetland 60N was accepted as flagged.
Wetland A61W	This wetland was verified as flagged.
Wetland B61W	This wetland was verified as flagged.
Wetland 61	Wetland 61E was accepted as flagged. The stream enters a culvert that lies beyond the limits of a sound wall and outside of the proposed ROW.

Wetland A62W	Wetland A62W was determined to be non-jurisdictional by the ACOE because it was determined to be isolated from Great Seneca Creek. However, MDE did take jurisdiction on the wetland. The wetland boundary flags were verified by MDE.
Wetland B62E	Wetland B62E was determined to be non-jurisdictional. It is an old SWM pond created within an upland portion of the floodplain to Great Seneca Creek.
Wetland C62E	Wetland C62E was accepted as flagged. It was noted that the wetland ends on the east side of flag 1.
Wetland 62E & 62W	Wetland flagging for 62E & 62W was accepted. The boundary lies along the banks of Great Seneca Creek.
Wetland A63W	This wetland was verified as flagged.
Wetland B63W	Flags B63W-4 through B63W-9 were removed, as this floodplain area was determined to be non-wetland. Flag B63W-3 will now connect to flag B63W-10. The remaining flags were verified. The ACOE noted that a detailed alternatives analysis for the proposed Watkins Mill Road interchange in the vicinity of flag B63W-20A16 will be required, as this wetland is of high quality.
Wetland C63W	This stream channel was determined to be ephemeral and non-jurisdictional.
Wetland D63W	This wetland was verified as flagged.
Wetland A63E	This stream channel was accepted as flagged. Wetland stick flags, placed along a riprap channel extending south from the stream upslope to a ditch along MD 124, were not put there by CRI. The agencies did not take jurisdiction on this ephemeral channel. A note will be given to the surveyors not to locate the stick flags.
Wetland B63E	This portion of the stream channel was accepted as flagged. However, the ACOE indicated that if the adjacent SWM pond was built in uplands, that they would not take jurisdiction on the outlet channel (flags B63E-1, B63E-2 and B63E-7). After investigating the Montgomery County Soil Survey, it appears that this SWM pond was built in uplands. Therefore, we will notify the surveyors not to locate the flags along the pond outlet channel.
Wetland C63E	Wetland C63E was accepted as flagged. The ACOE indicated that if the SWM pond, from which the flagged outlet swale drains, was constructed in uplands that they would not take jurisdiction on the wetland. After consulting the Montgomery County Soil Survey, the pond appears to have been constructed in the headwaters of a first order stream that drains to Great Seneca Creek. Therefore, this wetland will be considered jurisdictional.
Wetland 64	This wetland was verified as flagged.
Wetland 65	This wetland was verified as flagged.
Wetland 66	This wetland was verified as flagged.

These minutes are in draft form and are being submitted to MDSHA for review and comment.

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APPENDIX

SCEA Historic Resources from the Maryland Inventory of Historic Places (MIHP)
(See Figure 25)

<u>Map</u>			
<u>I.D. No.</u>	<u>Name of Historic Resource</u>	<u>MIHP No.</u>	
9	Neelsville Presbyterian Church	19-05	
10	Cider Barrel	19-33	
11	E.G. Ward Farm	19-08	
12	Log Cabin – demolished	19-12	
13	Crawford - Lippart House	19-31	
14	Germantown Historic District	19-13	
15	Madeline V. Waters House	19-13-01	
16	Bungalows	19-13-04	
17	Pumphrey - Mateney House	19-13-05	
18	Pumphrey Store	19-13-02	
19	Liberty Milling Company	19-13-03	
20	Suburban Bank Building (Germantown Railroad Station)	19-32	
21	Wallich - Heimer House	19-13-07	
22	Upton Bowman House	19-13-06	
23	Old Germantown	19-17	
24	Old M.E., Church, South (The Medical Clinic)	19-17-03	
25	Old Trinity M.E. Church, site and cemetery	19-17-02	
26	Snyder - King Barn #1 - demolished	19-18	
27	F. Gusendorf Log House (Dunn Log House)	19-19	
28	William Musser House, site and barn	19-20	
29	William Cromwell House	19-23	
30	Joseph A. Taney Farm (Strider Log Meathouse)	19-22	
31	Clopper Mill Ruins (Maccubbin's Mill, Woodlands Mill)	19-21	
32	Woodlands, site and smokehouse	20-29	
33	St. Rose of Lima Roman Catholic Church (St. Rose's Church & Cemetery)	20-28	
34	Briggs Farm #2	20-26	
35	Locust Grove Farm (Rabbitt Farm)	21-001	
36	B&O Railroad Underpass	20-30	
37	Metropolitan Branch, B&O Railroad	0	

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MIHP

<u>Map</u>			
<u>I.D. No.</u>	<u>Name of Historic Resource</u>		<u>MIHP No.</u>
38	Waring Viaduct		19-10
39	Waring - Crawford Farm		19-11
40	Ricketts Cemetery		19-09
41	Watkins Mill, site		19-07
42	William Thompson House		14-53
43	Waters - Dorsey House (and Cemetery) - demolished, 1972		20-02
44	Early 20 th Century Bungalow		21-090
45	Stone and Frame House		21-091
46	Colonial Revival Frame House-Office		21-045
47	Foster & Rosalie Summers House		21-169
48	Garrison W. Beall House		21-167
49	Henry H. Fraley House		21-155
50	Lewis Reed Residence		21-154
51	Late Victorian Frame House		21-088
52	Late Victorian Frame House		21-089
53	Late Victorian Barn		21-105
54	Big A Auto Parts (Lyric Theater)		21-147
55	Late Victorian Stucco House - demolished		21-131
56	Oscar Fulks/William Harding House (Mathias Service Center)		21-173
57	WSSC Water Plant (WSSC Pump Houses & Water Tank)		21-177
58	Early 20 th Century Bungalow		21-104
59	Charles and Nan Fox House (Fox House)		21-171
60	Charles Beall, Jr. House (Elizabeth Gaither House)		21-170
61	House with Shingled Gable		21-012
62	House with Bargeboards		21-011
63	Frame House		21-010
64	Early 20 th Century Bungalow		21-115
65	Early 20 th Century Bungalow		21-116
66	Colonial Revival Frame House		21-117
67	Cole-Ward House		21-172
68	Colonial Revival Frame House		21-119
69	First Baptist Church Property (Crawfordtown)		21-174
70	Gartner - Patterson House (Crawfordtown)		21-176
71	Fletcher House (Crawfordtown)		21-175

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MIHP

<u>Map</u>			
<u>I.D. No.</u>	<u>Name of Historic Resource</u>	<u>MIHP No.</u>	
72	Mills House	20-24	
73	Colonial Revival Frame House	21-160	
74	R. Dorsey House	21-163	
75	Late Victorian Frame House	21-114	
76	Late Victorian Frame House	21-113	
77	Late Victorian Frame House	21-112	
78	Late Victorian House	21-146	
79	Colonial Revival Frame House	21-095	
80	Early 20 th Century Bungalow	21-094	
81	Gothic Revival House	21-145	
82	Gothic Revival Frame House	21-111	
83	Late Victorian Frame House	21-112	
84	Colonial Revival Frame House	21-109	
85	Late Victorian Frame House	21-110	
86	Late Victorian Frame House	21-143	
87	Late Victorian Frame House	21-144	
88	Early 20 th Century Bungalow	21-093	
89	Early 20 th Century Bungalow	21-092	
90	Early 20 th Century Bungalow	21-102	
91	Early 20 th Century Bungalow	21-100	
92	Late Victorian Frame House	21-098	
93	Colonial Revival Frame House	21-099	
94	Early 20 th Century Bungalow	21-097	
95	Late Victorian Frame House	21-096	
96	Inns of Court	21-125	
97	Ballet 106	21-126	
98	St. Martin's Parish House	21-140	
99	Late Victorian Frame House	21-108	
100	T-Shaped Frame House - DeSellum and Francis Avenues	21-009	
101	Thomas Fulks House	21-129	