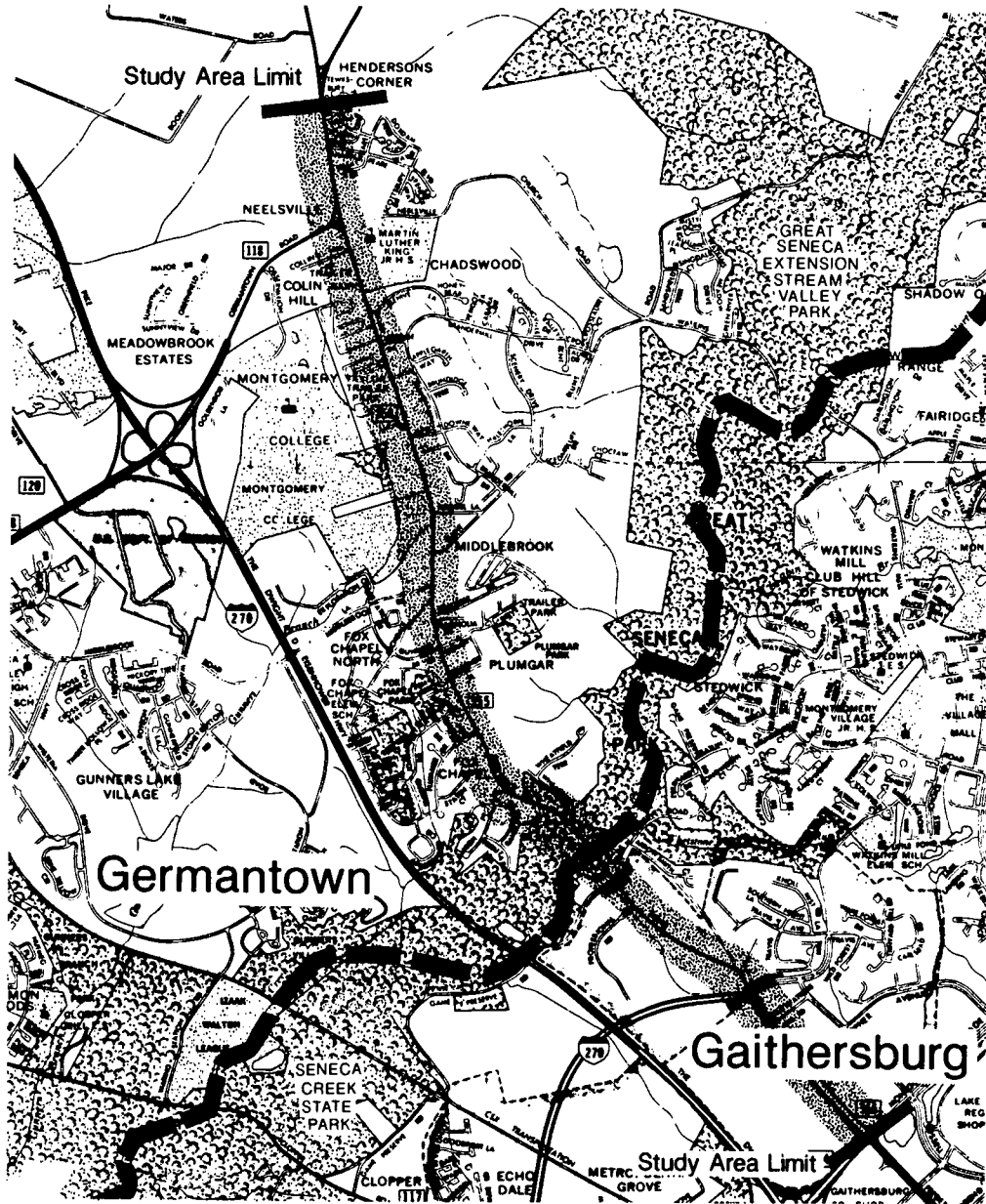


# INDICATING OF NO SIGNIFICANT IMPACT SECTION 4(f) EVALUATION

Contract No. M611-151-371

## RYLAND ROUTE 355

From MD 27 (Ridge Road) to MD 124 (Montgomery Village Avenue)  
Montgomery County, Maryland



Prepared by:  
Maryland Department of Transportation  
Federal Highway Administration

Maryland Department of Transportation  
State Highway Administration

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**FEDERAL HIGHWAY ADMINISTRATION  
REGION III**

**FINDING OF NO SIGNIFICANT IMPACT**

**MARYLAND ROUTE 355  
FROM MARYLAND ROUTE 27 TO MARYLAND ROUTE 124**

**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
AND  
STATE OF MARYLAND  
DEPARTMENT OF TRANSPORTATION  
STATE HIGHWAY ADMINISTRATION**

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The FHWA has determined that the Build Alternative, the widening of MD Route 355 from MD 27 (Ridge Road) to MD 124 (Montgomery Village Avenue), a six-lane staged construction for the length of the project (approximately four miles) with a bridge crossing of Great Seneca Creek, will have no significant impact on the human environment. This FONSI is based on the Environmental Assessment and the attached documentation which summarizes the assessment and documents the selection of the selected alternate. This FONSI 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.

12/20/93  
Date

  
FEDERAL HIGHWAY  
ADMINISTRATION  
DIVISION ADMINISTRATOR

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**MARYLAND ROUTE 355 IMPROVEMENTS  
FROM MD 27 TO MD 124  
CONTRACT NO. M611-151-371**

**FINDING OF NO SIGNIFICANT IMPACT**

**I. RECORD OF DECISION**



**Maryland Department of Transportation  
State Highway Administration**

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

**MEMORANDUM**

**TO:** Neil J. Pedersen, Director  
Office of Planning and  
Preliminary Engineering

**FROM:** Louis H. Ege, Jr. *[Signature]*  
Deputy Director  
Office of Planning and  
Preliminary Engineering

**DATE:** March 31, 1993

**SUBJECT:** MD 355 from MD 27 to MD 124  
Administrator's Selection Meeting

A meeting was held on February 25, 1993 to discuss the proposed improvements to MD 355. The purpose of the meeting was the selection of an alternative by the Administrator that would move forward into final design. Those in attendance were:

Hal Kassoff	Administrator
Neil Pedersen	Director, OPPE
Creston Mills	District #3 Engineer
Robert Douglass	Deputy Chief Engineer, Hwy Dev
Charles Adams	Director, OED
Louis Ege	Deputy Director, OPPE
Cynthia Simpson	Deputy Division Chief, PPD
Douglas Simmons	Assistant Division Chief, PPD
George Walton	Project Manager, PPD
Wanda Brocato	Project Engineer, PPD
Barbara Allera-Bohlen	Environmental Manager, PPD
Mark Duvall	Environmental Manager, PPD
Mona Dave	Traffic Forecaster, PPD
Steve Drumm	Chief, HDD
Earl Schaefer	Senior Engineer, HDD
Ed Schatz	Project Engineer, HDD
Glenn Vaughan	Bridge Engineer, BDD
Yelena Berenzon	Bridge Engineer, BDD
Wendy Wolcott	Landscape Architect, OED
Karen Coffman	Landscape Architect, OEP
Heidi Van Luven	Regional Planner, RIPD
Charles Rose	Engineer, EAPD
Greg Cooke	Engineer, EAPD
Eric Tabacek	Traffic Engineer, OOTS
Dilip Patel	Traffic Engineer, OOTS
Randall Scott	Traffic Engineer, Dist. #3
Matt Kalb	Materials Engineer, OMR

My telephone number is 333-1130

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 565-0451 D.C. Metro - 1-800-492-5062 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717



Mr. Neil J. Pedersen  
Page Two

David Martin	Geologist, OMR
Robert Merryman	Montgomery County DOT
Robert Simpson	Montgomery County DOT
Patricia Willard	M-NCPPC
William Barkley	Parsons Brinckerhoff
Steve Plano	Parsons Brinckerhoff
Richard Hebert	Greenhorne & O'Mara
Ernie Anderson	Greenhorne & O'Mara
Irene Mendoza	Greenhorne & O'Mara

The meeting opened with a brief background of the project history and a discussion of developer participation in the project. An area developer will be constructing the portion of MD 355 between MD 27 (Ridge Road) and Middlebrook Road to a four-lane divided and a five-lane facility. This work has been considered part of the No-Build Alternative in the State Highway Administration (SHA) project planning study since it will be in place prior to any state work.

Following is the outcome of the discussions and what was selected by the Administrator as the alternative to improve MD 355.

The selected alternative, Alternative #3, consists of widening the existing two lanes and the developer's section to a six-lane divided roadway. The design speed is 40 MPH. Included are a five-foot sidewalk on the east side of the roadway and an eight-foot hiker/biker trail on the west side. Landscaping will be placed between the sidewalks and the roadway, where there is available space, and along the median.

Retaining walls will be provided to reduce the number of relocations. All walls are approximately three to five feet in visible height and are approximately 100 feet long. The locations are:

Address

19110 Frederick Road  
19221 Frederick Road  
11401 Millport Circle  
20516 Frederick Road  
20524 Frederick Road  
20540 Frederick Road

Retaining walls in the parks are not recommended by the environmental agencies due to the passive nature of the parks, the cost and the minor amount of land they would save.

Due to fiscal restraints, the project would be stage constructed. The initial construction would only upgrade the section between Middlebrook Road and Watkins Mill Road. This includes the construction of a four-lane divided facility with the sidewalks. The design is such to allow the future fifth and sixth lanes to

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Page Three

be constructed in the median. By constructing the road in this way, local residences will be disturbed only once for roadway construction. The roadway would be in its ultimate "footprint."

A 53" dbh White Oak Tree was identified just north of Chapel Gate Road. Two alignments were developed, shifting to the east or the west, to avoid removal of the tree; however, between five and ten residences would have to be relocated with the shifts. Due to the impacts associated with saving the tree, it was decided to remove the tree.

During the course of the study, several bridge length options were developed for the Great Seneca Creek crossing. At the time of the Location/Design Public Hearing, the options were narrowed to a 100-foot bridge length that matches the existing length and a 400-foot bridge length. The actual length was subject to hydrological and hydraulic analyses. Upon completion, a bridge length of 320 feet was selected. The length and its height of 13 feet ± meets agencies' approval since it provides sufficient length to allow for a wildlife corridor and sufficient height to allow an equestrian underpass.

Great Seneca State Park and Great Seneca Extension Stream Valley Park (county park) are both located where MD 355 crosses Great Seneca Creek. The state park is located to the west of MD 355 and the county park is to the east. Also, wetlands can be found in all four quadrants of the creek and roadway intersection. The higher quality wetlands are on the west side. In order to avoid and/or minimize impacts to parkland and wetlands, two alignment shifts were developed, an east and west shift. Coordination took place between the environmental agencies and Montgomery County and it was determined that the east shift was preferred. This is what was selected by SHA.

A hazardous waste site has been identified in the northwest quadrant of the MD 355/Great Seneca Creek intersection. The preferred eastern shift impacts this location. Apparently, the site was previously used as an automobile repair/junk yard. An analysis was performed to determine type and extent of contamination. The results have been compiled and coordination with the Maryland Department of Environment (MDE) is occurring. If remediation is required, MDE will determine the method. The financing of the remediation has not yet been established.

A cross-section was developed in front of the Cider Barrel, a Maryland Inventory Site with Local Significance, that provides a six-lane facility with a sidewalk. This option does not require the relocation of the Cider Barrel. The section calls for the reduction of lane widths and the median to fit the six lanes into the "footprint" established by developer construction.

Mr. Neil J. Pedersen  
Page Four

During the course of the planning process, the project team met with most of the communities along MD 355 within the study limits. It was brought to their attention that construction would impact neighborhood signs and a school bus stop. The relocation of these features is being provided as part of the improvement.

This is the writer's interpretation concerning the decisions made by the Administrator at the selection meeting. If you have any questions, comments or additions, please contact George Walton at 333-1139.

I concur with the above.

Neil J. Pedersen  
Neil J. Pedersen, Director  
Office of Planning and  
Preliminary Engineering

4/11/93  
Date

cc: Attendees  
Ms. Jareene Barkdoll  
Mr. Bruce Grey  
Mr. William Hellmann  
Mr. Richard Ravenscroft

**MARYLAND ROUTE 355 IMPROVEMENTS  
FROM MD 27 TO MD 124  
CONTRACT NO. M611-151-371**

**FINDING OF NO SIGNIFICANT IMPACT**

**II. COMPARISON OF ALTERNATIVES**

## **Decision by State Highway Administration**

- The Maryland State Highway Administration (SHA) has selected to seek Location/Design Approval for the widening of MD Route 355 from MD 27 (Ridge Road) to MD 124 (Montgomery Village Avenue).

## **Description of Selected Build Alternative**

- Construct Alternate 3, a six-lane staged construction for the length of the project (approximately four miles) with a bridge crossing of Great Seneca Creek. The initial phase of construction consists of building a four-lane divided roadway with open median and closed outside shoulders from Middlebrook Road to Watkins Mill Road. The typical section includes two 11-foot travel lanes in each direction, exclusive left turn lanes at median openings and a 44-foot-wide open median with provision for adding the fifth and sixth lanes in the future. The design speed for this alternative is 40 miles per hour.
- Alignment Option: This option shifts the alignment east of the existing roadway through Great Seneca Extension Stream Valley Park, avoiding Seneca Creek State Park to the west.
- Bridge Option: This bridge option proposes a new dual bridge with three travel lanes each and a span length of approximately 320 feet. The existing bridge will be removed.

## **Actions to Address Concerns Raised Through the Study Process**

In order to address as many of the concerns raised through the study process as possible, the following actions will be taken:

- Retaining walls in the parks are not recommended by the environmental agencies due to the passive nature of the parks, the cost and the minor amount of land they would save.
- A hiker/biker trail, for the distance of the widening, will be included as part of the roadway construction project. This will allow both pedestrians and bicyclists to travel alongside this portion of MD 355.
- Any neighborhood signs which are impacted by construction will be replaced.
- The wooden bus stop for Middlebrook Mobile Home Park will be replaced upon completion of the project.
- A southbound left turn lane into businesses at Professional Drive will be included in the design.
- In order to avoid up to ten residential displacements, the 53-inch (diameter) oak tree avoidance option has been dropped from consideration and the tree will be removed.
- At a time when access to Cider Barrel Mobile Home Park may be built in conjunction with the open median at Oxbridge Drive (relocation of MD 118), SHA will be actively involved in the negotiations.

**Summary of Alternatives**

A summary of the three alternatives and their respective environmental consequences appears on the following page. The matrix serves to highlight the relative differences among the three options, detailing number and type of displacements, number and types of properties affected, amount and type of right-of-way required, and costs.

## SUMMARY OF ALTERNATIVES

Alternates	Number of Displacements					Number of Properties Affected					Right-of-way Required (acres)					Cost (Millions)										
	length of improvement (miles)	residential	business	churches/schools	total	residential	business	churches/schools	parklands	total	historic/archaeological sites	wetlands	floodplain	residential	commercial	churches/schools	parklands	total	historic/archaeological sites	woodland	wetlands	floodplain	preliminary engineering	right-of-way	construction	total
Alternate 1 (No-build)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Alternate 2	2.0	4	1	—	5	46	18	—	2	66	—	3	1	9.9	4.6	—	**3.2 to 4.1	**17.7 to 18.6	—	4.6	**1.1 to 1.7	**1.5 to 2.7	2.2	10.7	27.3	40.2
Alternate 3	3.7	8	4	—	12	86	39	—	2	127	—	3	1	16.2	10	—	**4.4 to 4.7	**30.6 to 30.8	—	8.4	**1.3 to 2.0	**1.9 to 2.6	3.4	20.7	42.5	66.6

\*\*Range includes east and west shift options

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**MARYLAND ROUTE 355 IMPROVEMENTS  
FROM MD 27 TO MD 124  
CONTRACT NO. M611-151-371**

**FINDING OF NO SIGNIFICANT IMPACT**

**III. SUMMARY OF ACTIONS AND RECOMMENDATIONS**



**A. BACKGROUND**

**1. Project Location and Description**

The MD 355 (Frederick Road) study area is located in the northwestern part of Montgomery County, Maryland (Figure 1). It extends approximately four miles through the Gaithersburg (including the City of Gaithersburg) and Germantown areas, from MD 27 (Ridge Road) on the north to MD 124 (Montgomery Village Avenue) on the south (Figure 2).

MD 355 is classified under Maryland Department of Transportation, State Highway Administration's Highway Development Manual (HDM) as an arterial. Access is uncontrolled along the two-to-four-lane roadway and consists of residential and commercial driveways, entrances to public facilities and signalized and unsignalized intersections. The roadway serves as a distributor for the many local county collector roads that intersect along its north-south alignment. MD 355 provides access to Shady Grove Metro station in Gaithersburg and serves as a collector to Interstate 270. Within the study area, MD 355 connects to I-270 at MD 124, Middlebrook Road, MD 118 and eventually just north of the existing MD 27:

**2. Purpose and Need**

The purpose of this study is to investigate ways to increase traffic capacity and improve safety along existing MD 355, from MD 27 to MD 124. MD 355 links the communities within the Gaithersburg vicinity and Germantown areas, aids in the transportation of goods and services, and serves as an important commuter route for local and through traffic. The objective of the proposed action is to alleviate existing and projected traffic congestion and provide continued safe and efficient operation into the future.

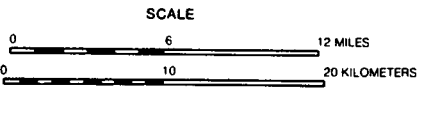
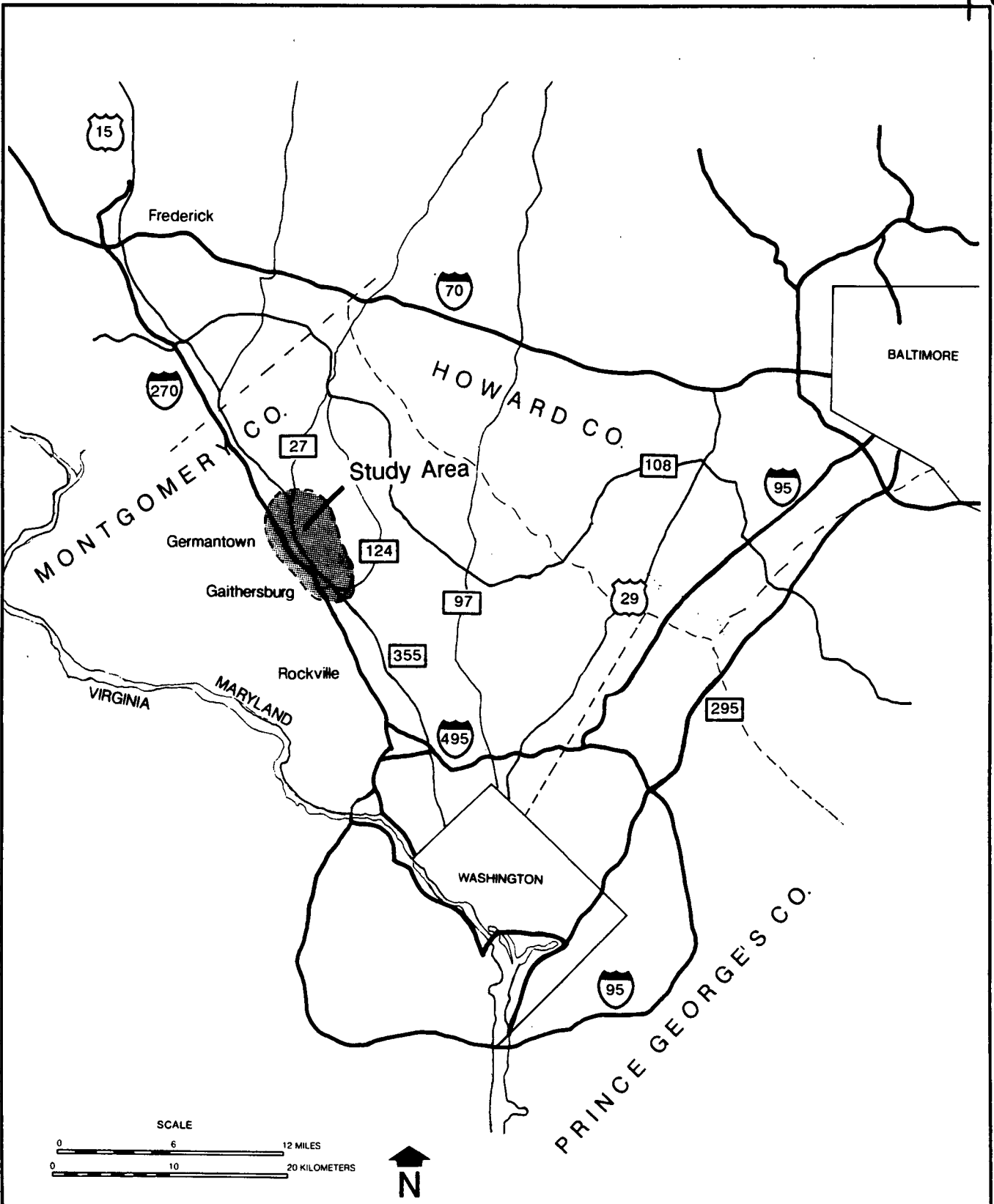
**Existing Facility**

The existing facility has a number of geometric and operational deficiencies. According to current design parameters, several sections of MD 355 have undesirable design characteristics:

- Poor geometrics are found in the vicinity of Great Seneca Creek. At this location, the roadway wanders through an "S" turn, coupled with a relatively steep vertical grade that provides very short sight distance.
- An existing steep earth embankment near the creek obstructs sight lines.
- The embankment does not allow for any shoulder area which would serve as a breakdown and/or recovery area.

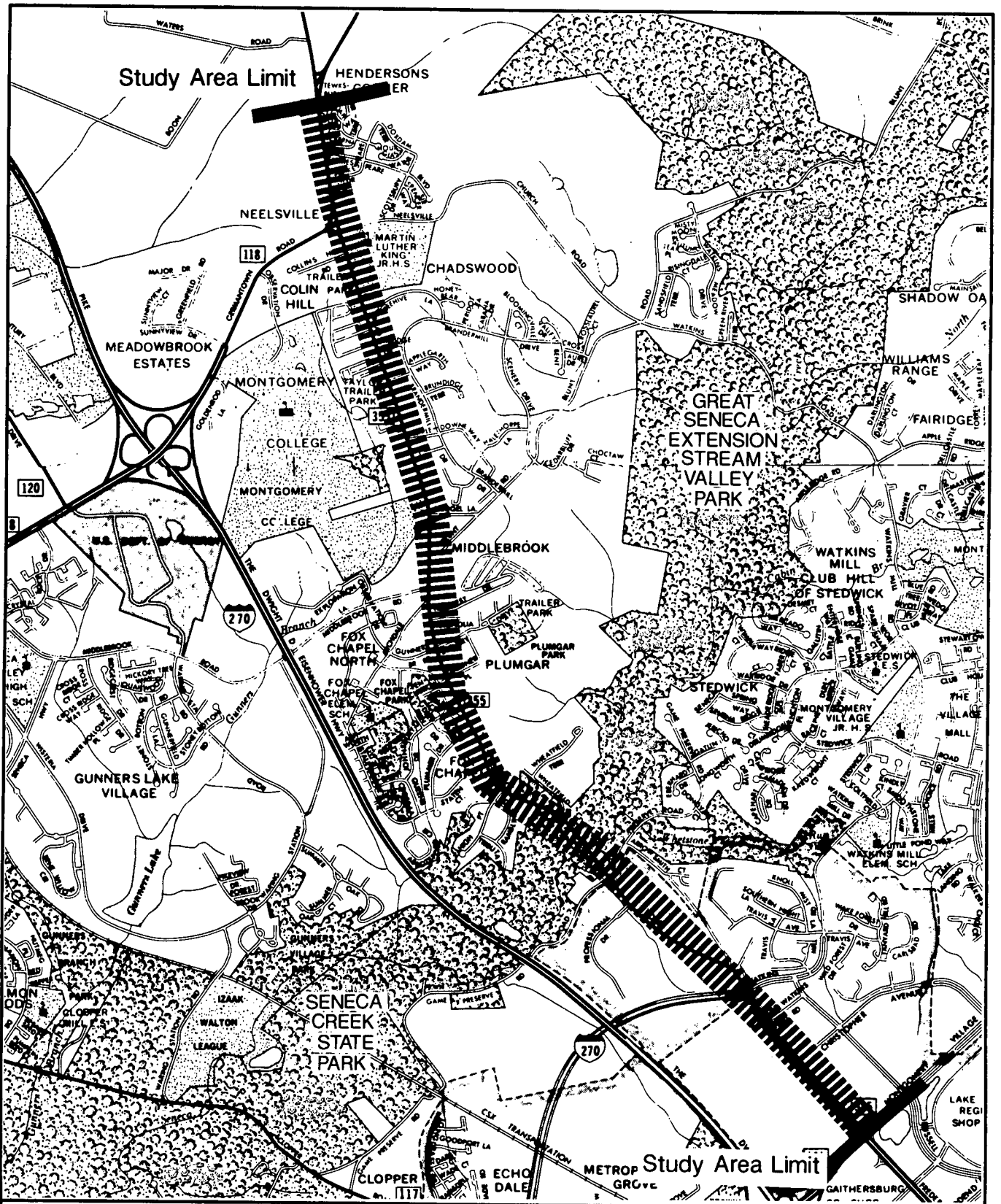
Operationally, MD 355 experiences severe congestion and safety problems:

- Commercial and residential development along this corridor has become a significant source of localized traffic.
- Commuter traffic queues in the morning peak often extend from the MD 355/MD 124 intersection to south of Middlebrook Road.
- Segments of MD 355 experience significantly higher accident rates than the state-wide average.



**Maryland Route 355**  
 MD 27 to MD 124  
 MARYLAND STATE HIGHWAY ADMINISTRATION

Figure 1  
 Location Map



# Maryland Route 355

MD 27 to MD 124

MARYLAND STATE HIGHWAY ADMINISTRATION

Figure 2

# Project Study Area

0 2000 4000 FT.



### 3. Project History

Plans to improve the traffic flow between MD 124 and MD 27 were included in the MD Department of Transportation's Secondary Construction Program of the Consolidated Transportation Program (CTP) (FY 1993-1998); a change from FY 1992-1997 CTP. The project was added to the Construction Program from the Development and Evaluation Program based upon recent revenue increases. The project is contained in Montgomery County's 1989 Germantown Master Plan and 1985 Gaithersburg Vicinity Master Plan. Improvements to MD 355 are consistent with other major county transportation improvements that are programmed for planning, design and/or construction. They include:

- Montgomery County M-83 (Germantown-Montgomery Village Connector);
- Montgomery County M-27 (Father Hurley Boulevard);
- MD 118;
- Middlebrook Road;
- Watkins Mill Road; and
- Travers Avenue.

### B. ALTERNATIVES CONSIDERED

Alternatives considered include a No-Build (Alternate 1), a four/five-lane alternative (Alternate 2), and a six-lane alternative (Alternate 3). The design year for all three alternates is 2015.

#### 1. Alternate 1 (No-Build)

The No-Build alternative assumed that there would be no major improvements to increase capacity on existing MD 355 within the study limits although normal highway maintenance and safety improvements would still occur. Alternate 1 included proposed MD 355 improvements by a private developer, consisting of widening MD 355 from two lanes to a four/five-lane roadway from Middlebrook Road to the northern project study limit. Existing planned and programmed improvements to the transportation network in the study area were also included in the No-Build alternative (see below).

- Montgomery County M-83 (Germantown-Montgomery Village Connector);
- Montgomery County M-27 (Father Hurley Boulevard);
- MD 118;
- Middlebrook Road;
- Watkins Mill Road; and
- Travers Avenue.

#### 2. Alternate 2 (Four/Five Lanes)

Alternate 2 consisted of widening the existing two-lane roadway to a four/five-lane curbed roadway. A four-lane divided roadway segment was proposed from Scenery Drive to Game Preserve Road and consisted of two 12-foot travel lanes in each direction; a 20-foot-wide raised median; exclusive left turn lanes at median openings; and a 40 mile per hour (mph) design speed. The five-lane undivided roadway segment was proposed from Game Preserve Road to Watkins Mill Road and Middlebrook Road to Scenery Drive and would consist of two 12-foot travel lanes in each direction; a 13-foot center lane for left turns from either direction; and a 40 mph design speed.

The proposed alignment for the four/five-lane alternative generally followed the existing alignment but was improved to achieve safer operating characteristics for the present posted speed limit. The segment of MD 355 from MD 27 to Middlebrook Road was assumed to have been upgraded to a four/five-lane roadway by a private developer, as previously described under the No-Build alternative. This improvement and the other planned and programmed transportation improvements were common to all three alternates under study.

**Alignment Sub-options**

Several options involving mainline alignment shifts were evaluated to minimize the proposed roadway's effects on existing wetlands, parkland and the Great Seneca Creek floodplain:

- East Shift: The alignment would shift east of the existing centerline through Great Seneca Extension Stream Valley Park, affecting this park instead of both this park and Seneca Creek State Park; and
- West Shift: The alignment would shift west of the existing centerline through Seneca Creek State Park affecting this park instead of both this park and Great Seneca Extension Stream Valley Park.
- Tree Avoidance: An alignment shift was also investigated to determine the feasibility of retaining the 53-inch (diameter) white oak located just north of Chapelgate Road.

**Bridge Options**

Several bridge heights and lengths for the Great Seneca Creek crossing through the parklands were considered for the build alternatives.

- Low Bridge: This option proposed a new dual bridge with three travel lanes in each direction and a span length of approximately 100 feet. The existing low bridge would be removed.
- High Bridge: This option proposed a new dual bridge with three travel lanes in each direction and a span length of approximately 400 feet. The existing low bridge would be removed.

**Shoulder Areas and Retaining Walls**

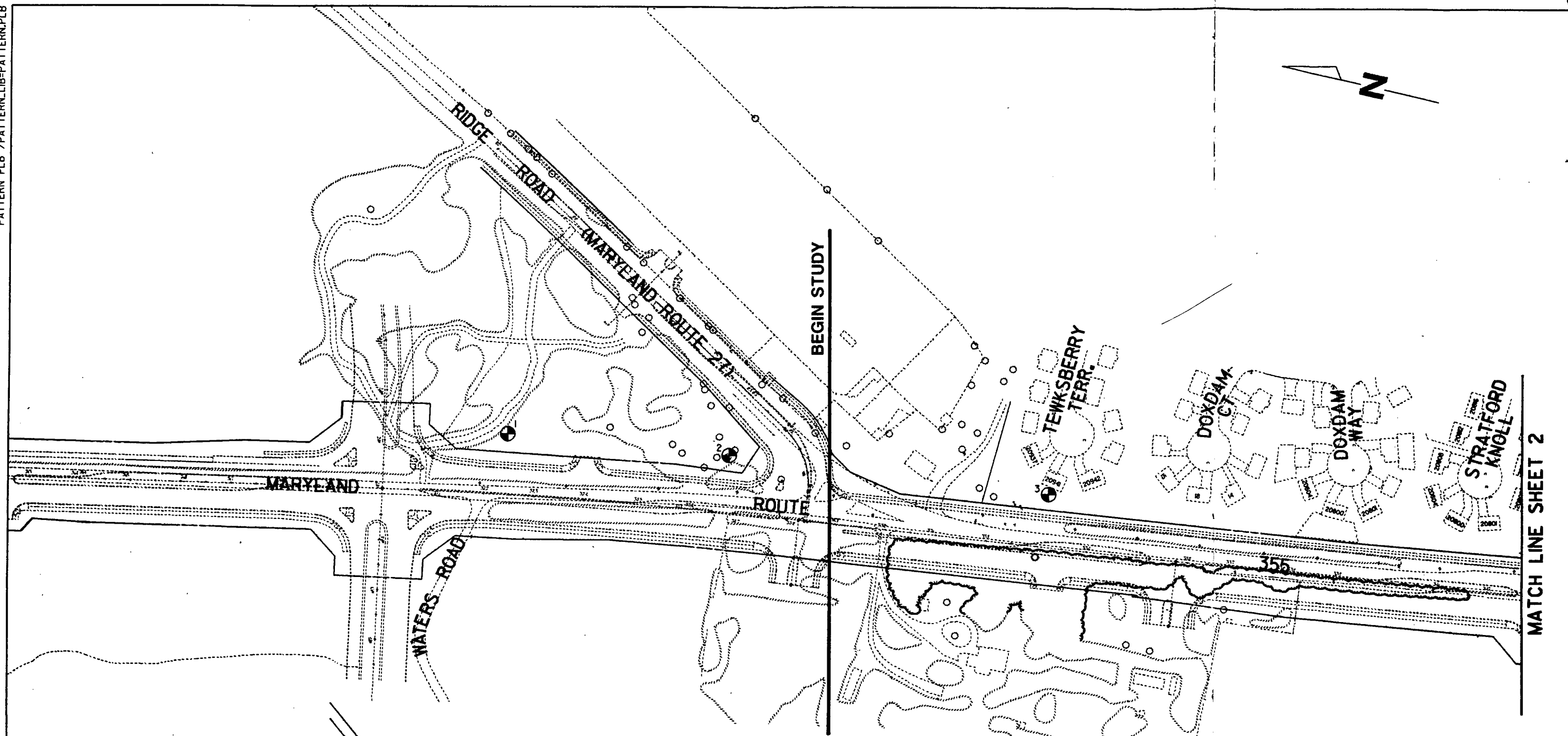
Varying shoulder area widths were considered at certain locations for the purpose of increasing pedestrian safety and bicycle compatibility, or providing additional landscape buffer along the proposed right-of-way. Retaining walls were also considered and evaluated at critical locations to minimize displacements and impacts to wetlands and parkland in the vicinity of Great Seneca Creek.

**3. Selected Build Alternative**

**Alternate 3 Staged Construct**

The selected build alternative is a staged construction Alternate 3, with an east shift and a 320-foot bridge over Great Seneca Creek (see Figures 3 to 14). Alternate 3 consists of widening the existing two-lane roadway by phasing construction of six lanes. The limits of the initial staged construction are between Middlebrook Road and Watkins Mill Road. Initially, a four-lane divided roadway with open median and closed outside shoulders would be constructed; at a later date the construction of the fifth

LEVEL LEGEND:  
ALTERNATE 3  
ALN LEVEL OFF: 1-28,33-63  
ROW LEVEL OFF: NONE  
TOPO LEVEL OFF: 14-17,34-41-63  
COLOR CTB (IGR:IPS:PROIGSHADE  
PEN TBL (PLOTS)MD355.TBL  
PATTERN PLB /PATTERN.LIB=PATTERN.PLB



MATCH LINE SHEET 2

"PROPOSED MARRIOTT MILESTONE DEVELOPMENT"

LEGEND:

- ROADWAY
- WETLAND BOUNDARY
- FLOODPLAIN LIMIT
- WOODLAND BOUNDARY
- NOISE RECEPTOR SITE
- RELOCATION
- EXISTING RIGHT-OF-WAY
- PROPOSED RIGHT-OF-WAY
- PARK BOUNDARY LINE

AQUIFER

STAGED CONSTRUCTION

**MARYLAND ROUTE 355**  
MD ROUTE 27 TO MD ROUTE 124

**ALTERNATE 3**

**SIX LANE DIVIDED ALTERNATIVE**

DRAWING No  
MD355PI-00

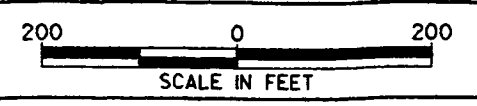
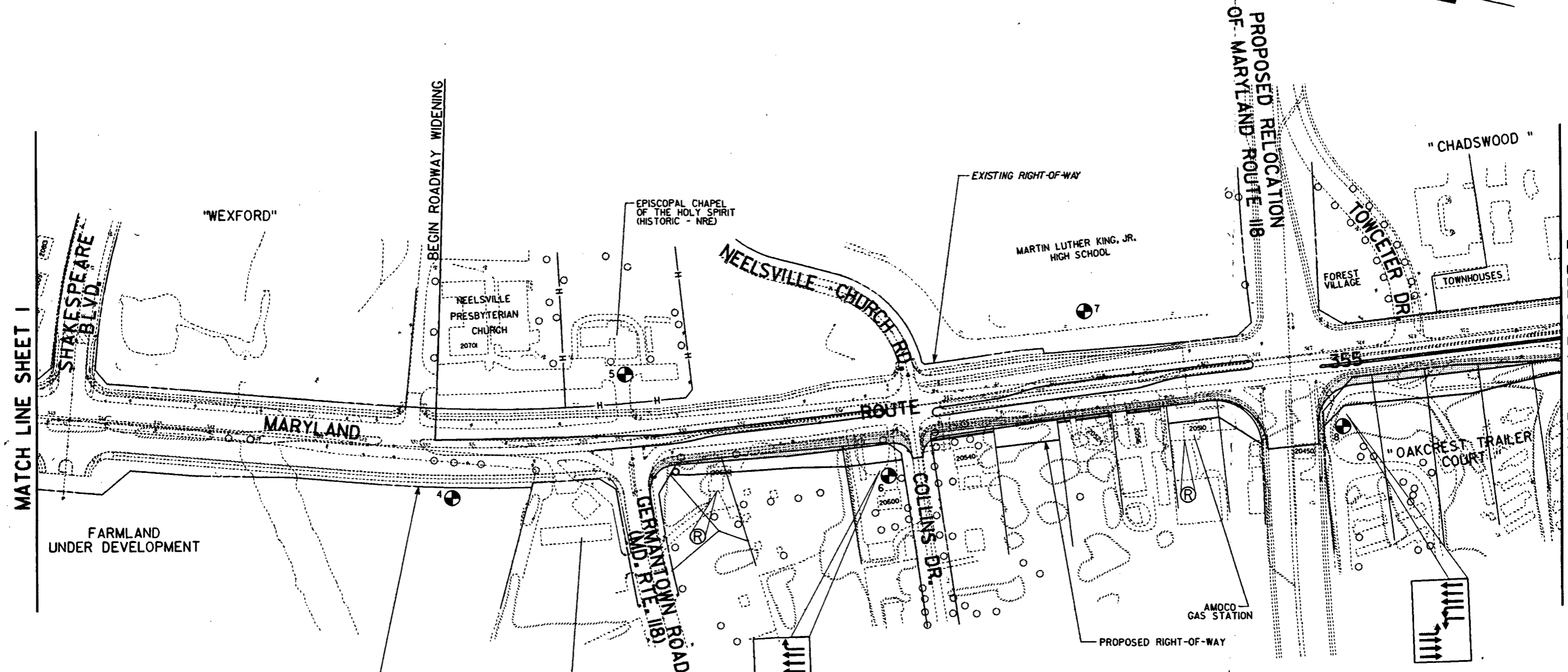


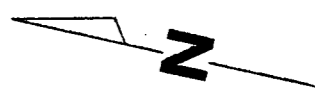
Figure 3  
SHEET 1 of 8

LEVEL LEGEND:  
 ALTERNATE 3  
 ALN LEVEL OFF: 1-28.33  
 ROW LEVEL OFF: NONE  
 TOPO LEVEL OFF: 14-17.34  
 COLOR CTB: IGR,IPS,PROIGSHADE  
 PEN: TBL (PLOTS)MD355.TBL  
 PATTERN: PLB /PATTERN\_LIB=PATTERN.PLB



MATCH LINE SHEET 1

MATCH LINE SHEET 3



LEGEND:

- ROADWAY
- WETLAND BOUNDARY
- FLOODPLAIN LIMIT
- WOODLAND BOUNDARY
- NOISE RECEPTOR SITE
- RELOCATION
- EXISTING RIGHT-OF-WAY
- PROPOSED RIGHT-OF-WAY
- PARK BOUNDARY LINE
- HISTORIC PROPERTY
- PROPOSED RETAINING WALL

STAGED CONSTRUCTION

**MARYLAND ROUTE 355**  
**MD ROUTE 27 TO MD ROUTE 124**

**ALTERNATE 3**

**SIX LANE DIVIDED ALTERNATIVE**

DRAWING No  
 MD355P2-00

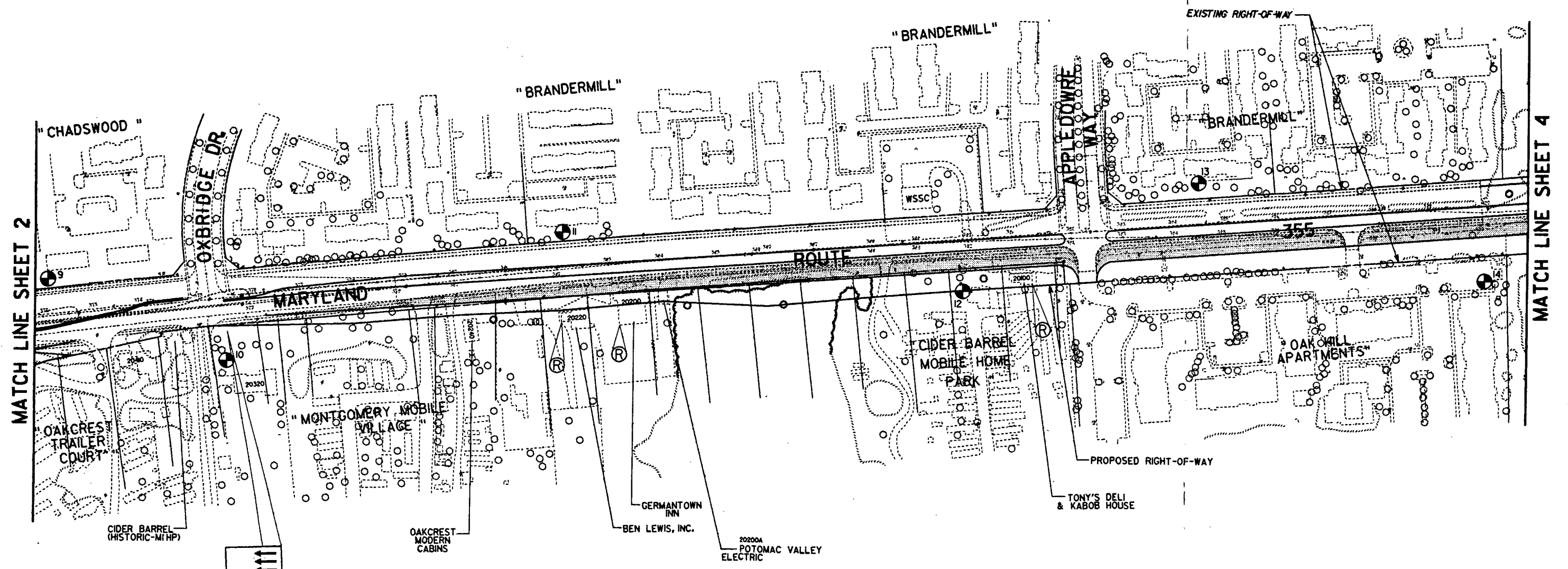
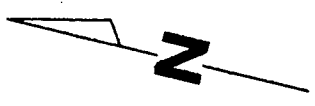


Figure 4  
 SHEET 2 of 8

23-MAR-1995 10:00  
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 355H428.TTN  
 DESIGN SURF

ALTERNATE 3  
 ALN LEVEL OFF: 1-2-63  
 ROW LEVEL OFF: NONE  
 TOPO LEVEL OFF: 14-17-34-35-61-63  
 COLOR CTB: IGR.IPS.PROJCSHADE  
 PEN TBL MD395  
 PATTERN PLB /PATTERN.LIB=PATTERN

24



MATCH LINE SHEET 2

MATCH LINE SHEET 4

**LEGEND:**

- ROADWAY
- WETLAND BOUNDARY
- FLOODPLAIN LIMIT
- WOODLAND BOUNDARY
- NOISE RECEPTOR SITE RELOCATION
- RELOCATION
- EXISTING RIGHT-OF-WAY
- PROPOSED RIGHT-OF-WAY
- PARK BOUNDARY LINE

STAGED CONSTRUCTION

**MARYLAND ROUTE 355**  
 MD ROUTE 27 TO MD ROUTE 124

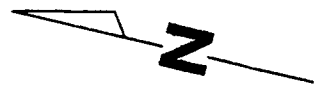
**ALTERNATE 3**  
**SIX LANE DIVIDED ALTERNATIVE**

DRAWING No MD355P3-00	200  200 SCALE IN FEET	Figure 5 SHEET 3 of 8
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DESIGN: 355H428.TTN

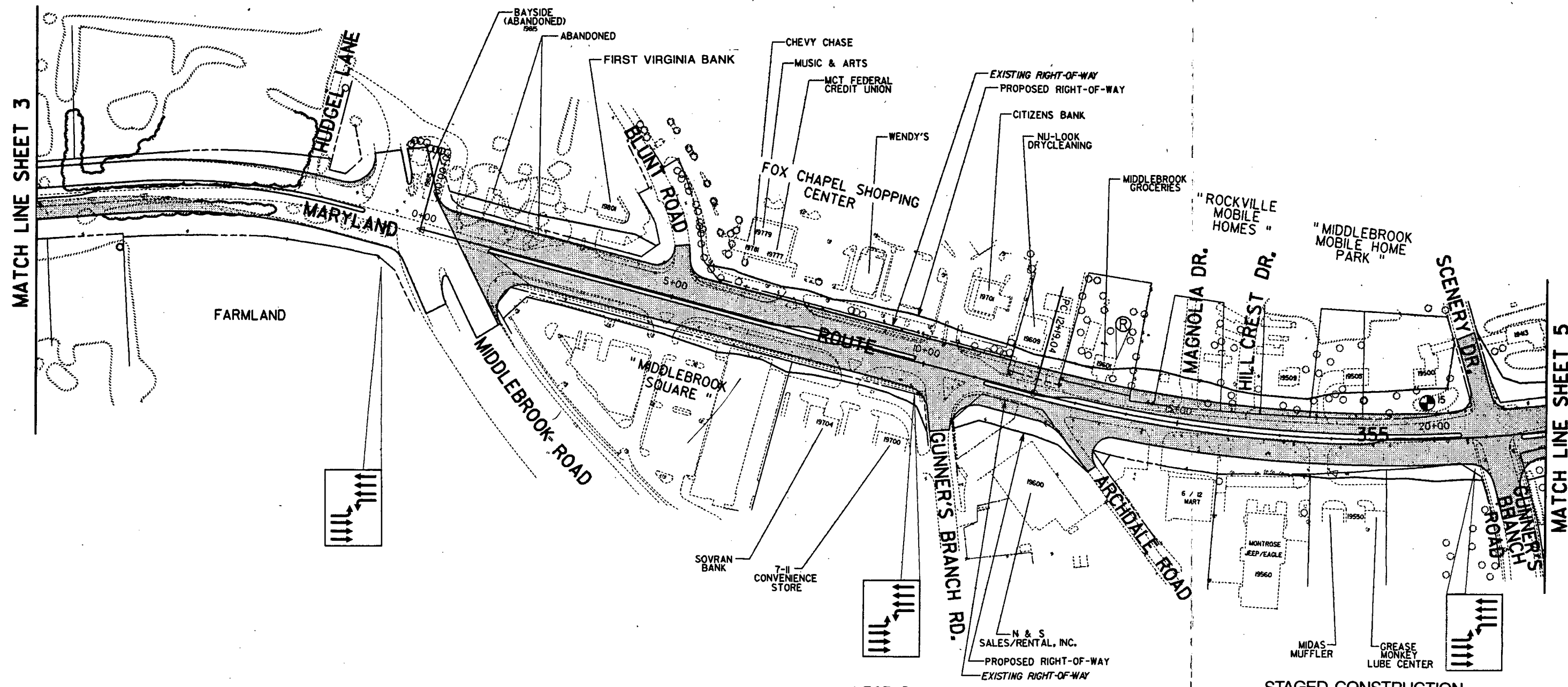


ALTERNATE 3  
ALN LEVEL OFF: 1-28.33-63  
ROW LEVEL OFF: NONE  
TOPO LEVEL OFF: 14-17.34-35.61-63  
COLOR CTB: IGR.IPS.PROTGS.HADE  
PEN TBL MD355  
PATTERN PLB /PATTERN.LIB=PATTERN.PLB



MATCH LINE SHEET 3

MATCH LINE SHEET 5



**LEGEND:**

- ROADWAY
- WETLAND BOUNDARY
- FLOODPLAIN LIMIT
- WOODLAND BOUNDARY
- NOISE RECEPTOR SITE
- RELOCATION
- EXISTING RIGHT-OF-WAY
- PROPOSED RIGHT-OF-WAY
- PARK BOUNDARY LINE

**MARYLAND ROUTE 355**  
**MD ROUTE 27 TO MD ROUTE 124**

**ALTERNATE 3**

**SIX LANE DIVIDED ALTERNATIVE**

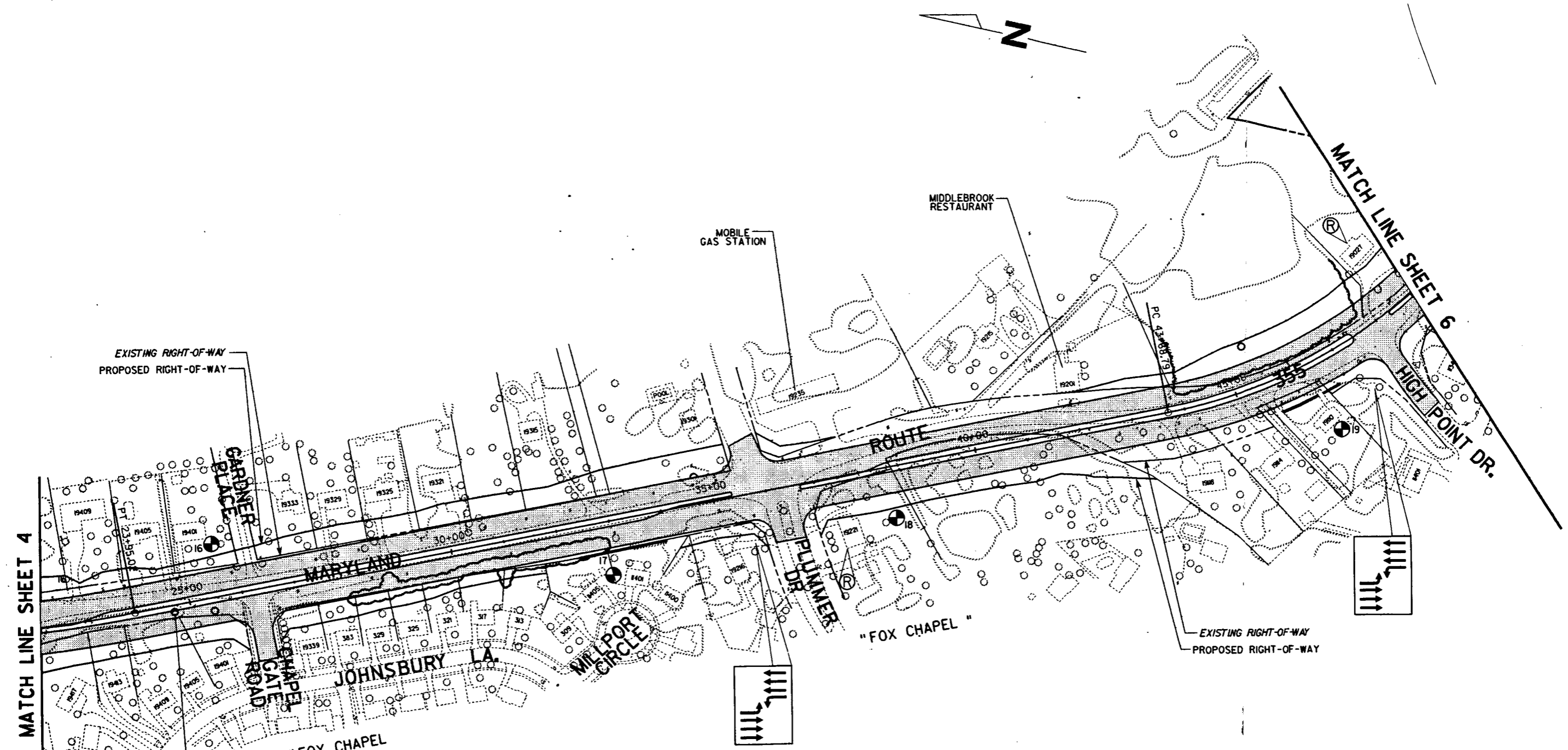
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DRAWING No MD355P4-00

200 0 200  
SCALE IN FEET

Figure 6  
SHEET 4 of 8

ALTERNATE 3  
 OFF: 1-28,33-63  
 ALN LEVEL OFF: NONE  
 ROW LEVEL OFF: NONE  
 TOPO LEVEL OFF: 14-17,34  
 COLOR CTB: IGR.IPS.PROJGSHADE  
 PEN TBL: MD355  
 PATTERN PLB: /PATTERN.LIB=PATTERN.PLB



- LEGEND:**
- ROADWAY
  - WETLAND BOUNDARY
  - FLOODPLAIN LIMIT
  - WOODLAND BOUNDARY
  - NOISE RECEPTOR SITE
  - RELOCATION
  - EXISTING RIGHT-OF-WAY
  - PROPOSED RIGHT-OF-WAY
  - PARK BOUNDARY LINE
  - PROPOSED RETAINING WALL

STAGED CONSTRUCTION

**MARYLAND ROUTE 355**  
 MD ROUTE 27 TO MD ROUTE 124

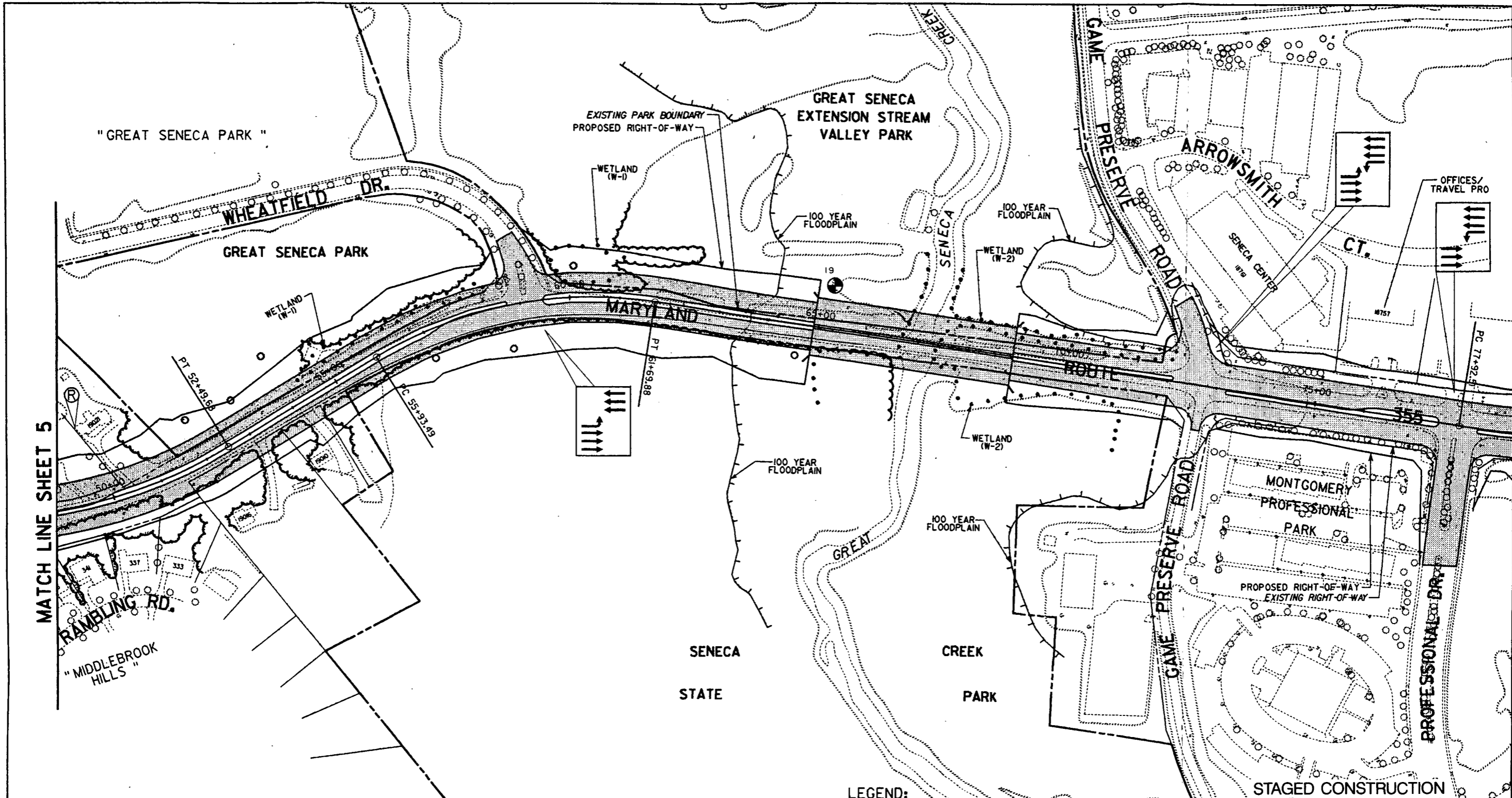
**ALTERNATE 3**  
 SIX LANE DIVIDED ALTERNATIVE

DRAWING No MD355P5-00	<p>SCALE IN FEET</p>	Figure 7 SHEET 5 of 8
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






LEVEL: LEVELNAME  
 ALTERNATE 3  
 ALN LEVEL OFF: 1'-28.3"  
 ROW LEVEL OFF: NONE  
 TOPO LEVEL OFF: 14'-17.34'-35.61'-63"  
 COLOR CTB: IGR.IPS.PROJCSHADE  
 PEN TBL: MD355  
 PATTERN: PLB 7/PATTERN\_LIB=PATTERN.PLB

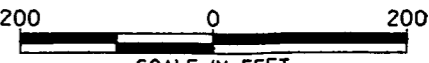
MATCH LINE SHEET 5

MATCH LINE SHEET 7



**LEGEND:**

-  ROADWAY
-  WETLAND BOUNDARY
-  FLOODPLAIN LIMIT
-  WOODLAND BOUNDARY
-  NOISE RECEPTOR SITE
-  RELOCATION
-  EXISTING RIGHT-OF-WAY
-  PROPOSED RIGHT-OF-WAY
-  PARK BOUNDARY LINE

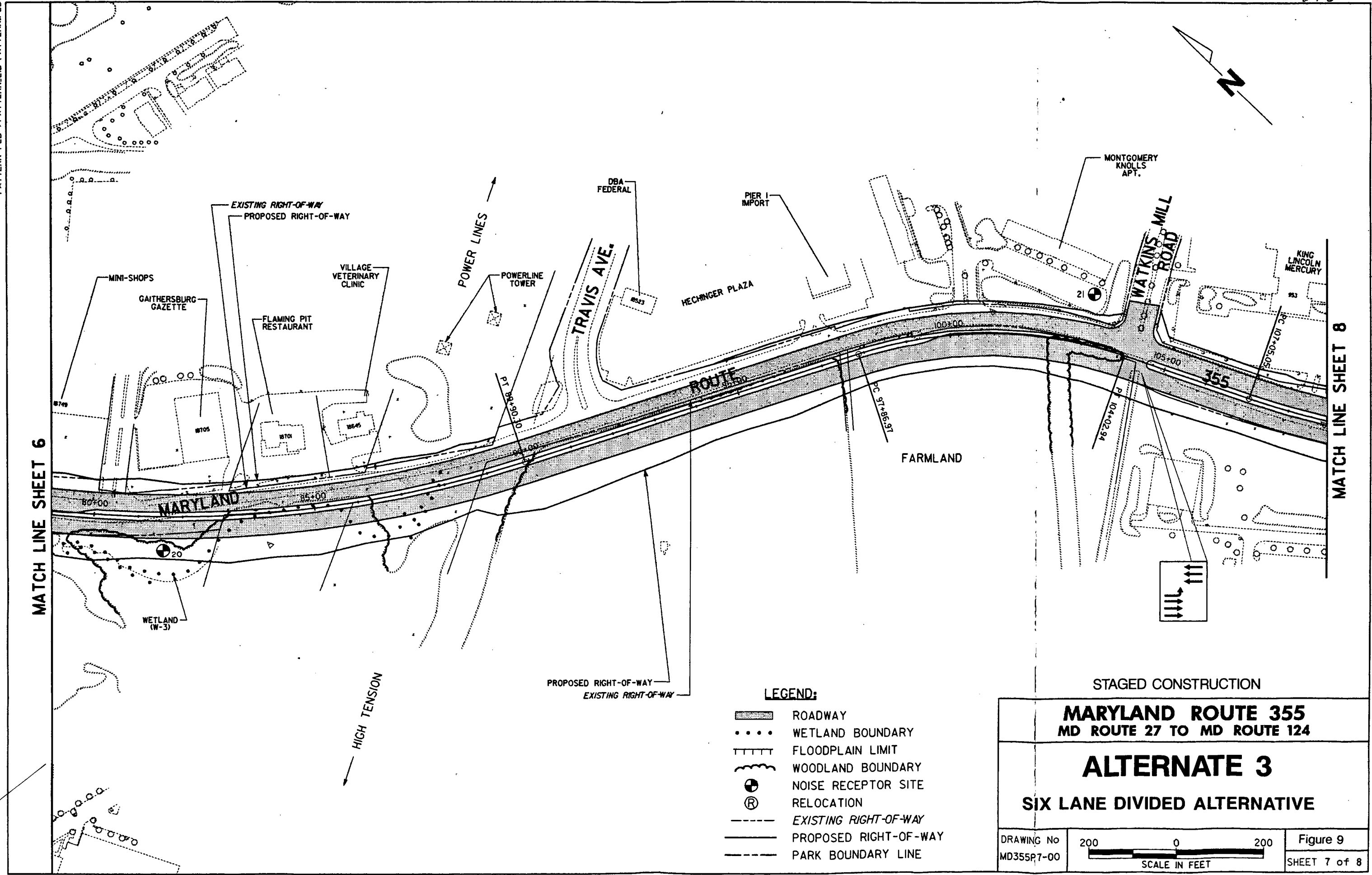
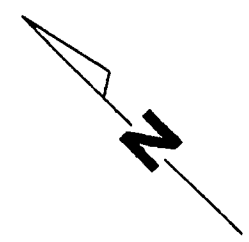
<b>MARYLAND ROUTE 355</b> MD ROUTE 27 TO MD ROUTE 124		
<b>ALTERNATE 3</b>		
<b>SIX LANE DIVIDED ALTERNATIVE</b>		
DRAWING No MD355P6-00	 200 0 200 SCALE IN FEET	Figure 8 SHEET 6 of 8

DESIGN: /usr2/md355/md355p6.dgn  
 TCE: 355HA28.TTN



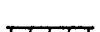






ALTERNATE 3  
ALN LEVEL OFF: 1-28.5  
ROW LEVEL OFF: NONE  
TOPO LEVEL OFF: 14-17.34-35.61-63  
COLOR CTB: ICR.IPS.PROJCSHADE  
PEN TBL MD355  
PATTERN PLB /PATTERN\_LIB-PATTERN.PLB

MATCH LINE SHEET 6

MATCH LINE SHEET 8



**LEGEND:**

-  ROADWAY
-  WETLAND BOUNDARY
-  FLOODPLAIN LIMIT
-  WOODLAND BOUNDARY
-  NOISE RECEPTOR SITE
-  RELOCATION
-  EXISTING RIGHT-OF-WAY
-  PROPOSED RIGHT-OF-WAY
-  PARK BOUNDARY LINE

STAGED CONSTRUCTION

**MARYLAND ROUTE 355**  
MD ROUTE 27 TO MD ROUTE 124

**ALTERNATE 3**  
**SIX LANE DIVIDED ALTERNATIVE**

DRAWING No  
MD355P7-00

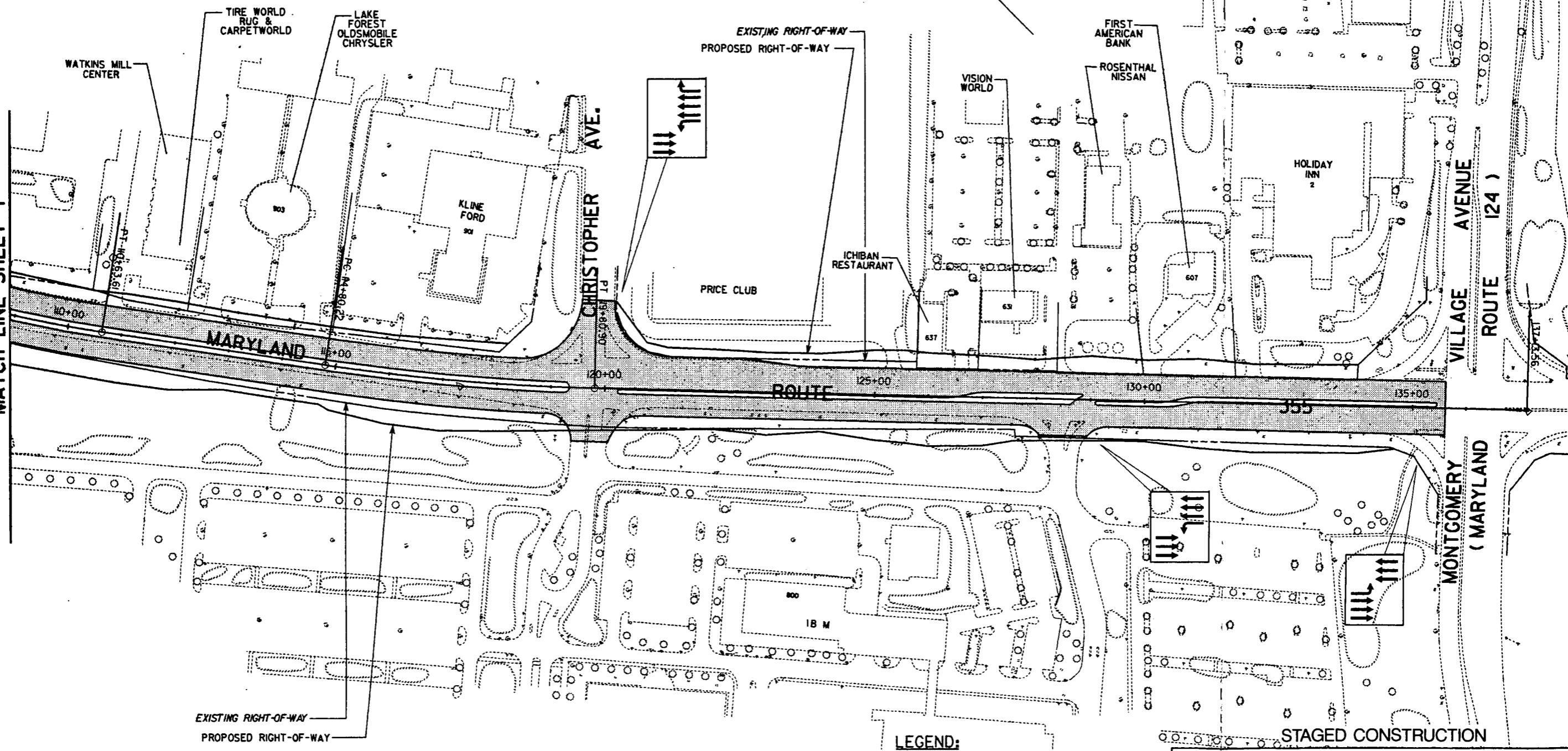
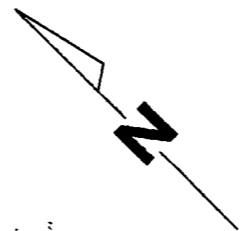


Figure 9  
SHEET 7 of 8

ALTERNATE 3  
 ALN LEVEL OFF: 1-28  
 ROW LEVEL OFF: NONE  
 TOPO LEVEL OFF: 14-17, 34-35, 61-63  
 COLOR CTB (IGR, IPS, PROJ, SHADE)  
 PEN TBL MD355  
 PATTERN PLB /PATTERN.LIB=PATTERN.PLB

MATCH LINE SHEET 7

END OF STUDY



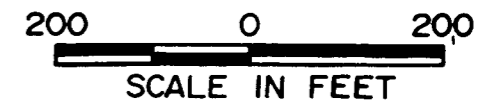
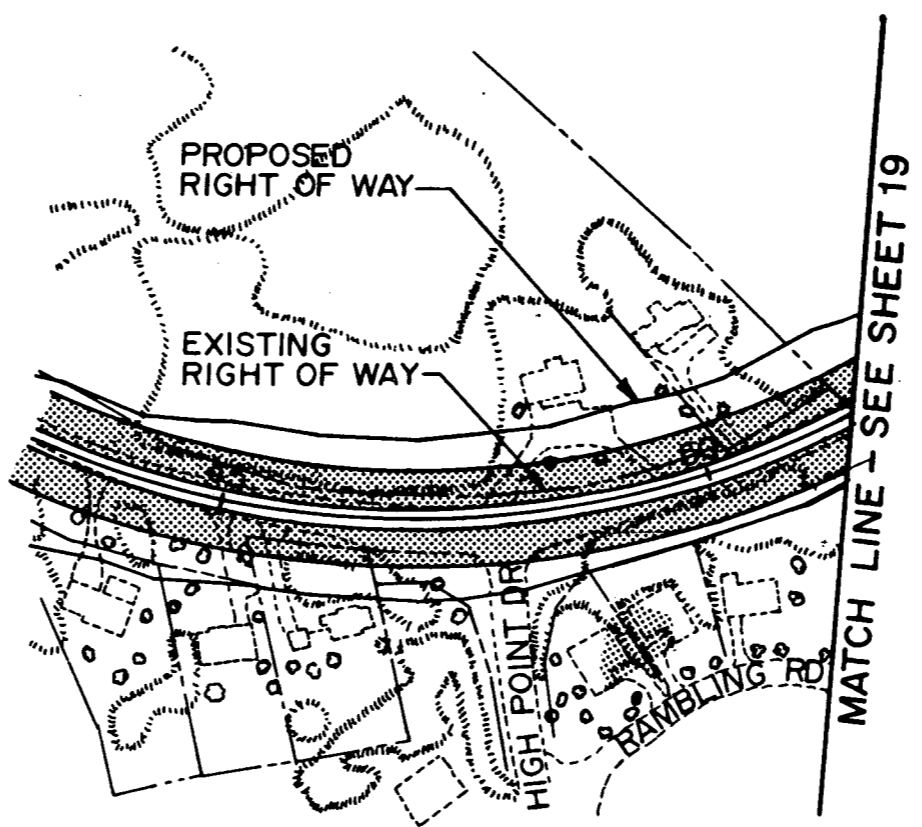
**LEGEND:**

- ROADWAY
- WETLAND BOUNDARY
- FLOODPLAIN LIMIT
- WOODLAND BOUNDARY
- NOISE RECEPTOR SITE
- RELOCATION
- EXISTING RIGHT-OF-WAY
- PROPOSED RIGHT-OF-WAY
- PARK BOUNDARY LINE

<b>MARYLAND ROUTE 355</b> MD ROUTE 27 TO MD ROUTE 124		
<b>ALTERNATE 3</b>		
<b>SIX LANE DIVIDED ALTERNATIVE</b>		
DRAWING No MD355P8-00	 SCALE IN FEET	Figure 10 SHEET 8 of 8



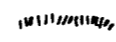
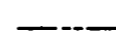
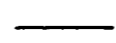
DESIGN DATE: 3/5/84 28.TTN

GREAT SENECA EXTENSION  
STREAM VALLEY PARK



STAGED CONSTRUCTION

LEGEND

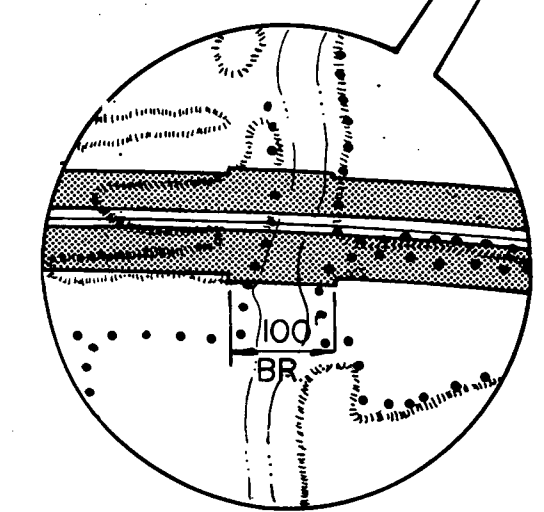
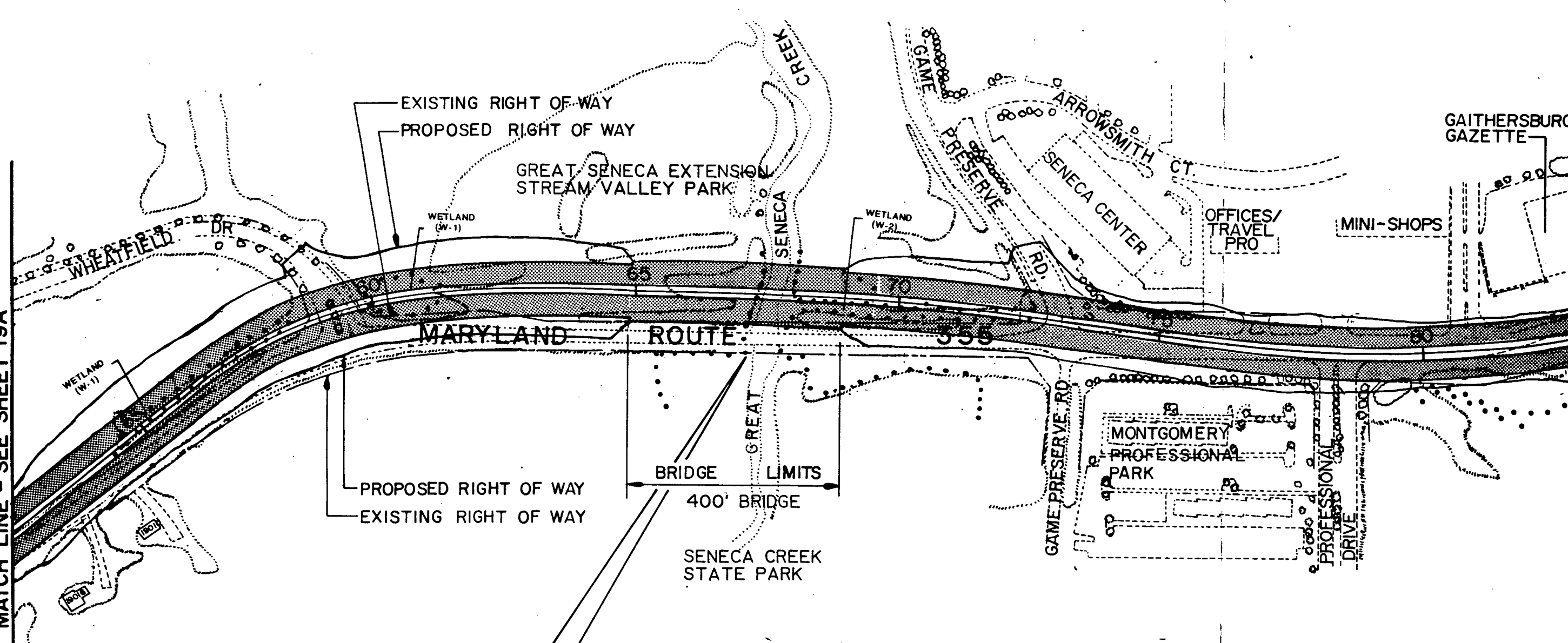
-  ROADWAY
-  WETLAND BOUNDARY
-  FOREST BOUNDARY
-  EXISTING RIGHT OF WAY
-  PROPOSED RIGHT OF WAY

<b>MARYLAND ROUTE 355 EAST SHIFT</b>		
<b>ALTERNATE 3 6 LANE DIVIDED ALTERNATE</b>		
DWG NO	DATE	Figure 11
		SHEET NO 19A



MATCH LINE - SEE SHEET 19A

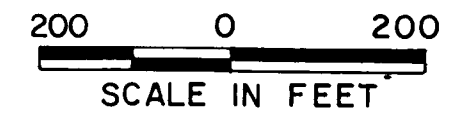
MATCH LINE - SEE SHEET 19B



SHORT BRIDGE CROSSING OPTION

LEGEND

- ROADWAY
- WETLAND BOUNDARY
- FOREST BOUNDARY
- EXISTING RIGHT OF WAY
- PROPOSED RIGHT OF WAY

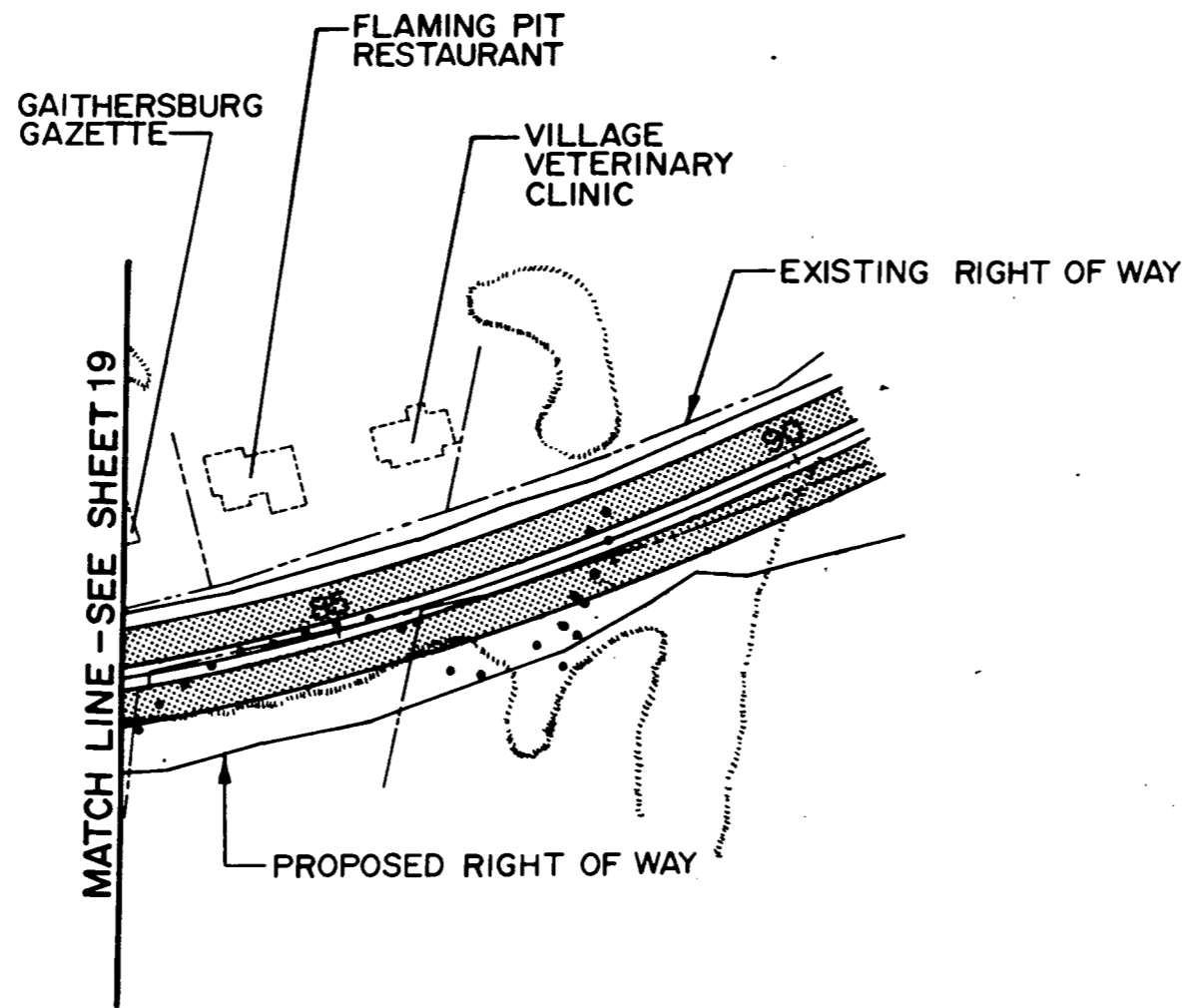


STAGED CONSTRUCTION






**MARYLAND ROUTE 355  
EAST SHIFT**

**ALTERNATE 3'  
6 LANE DIVIDED ALTERNATE**

DWG NO	DATE	Figure 12
		SHEET 19



**LEGEND**

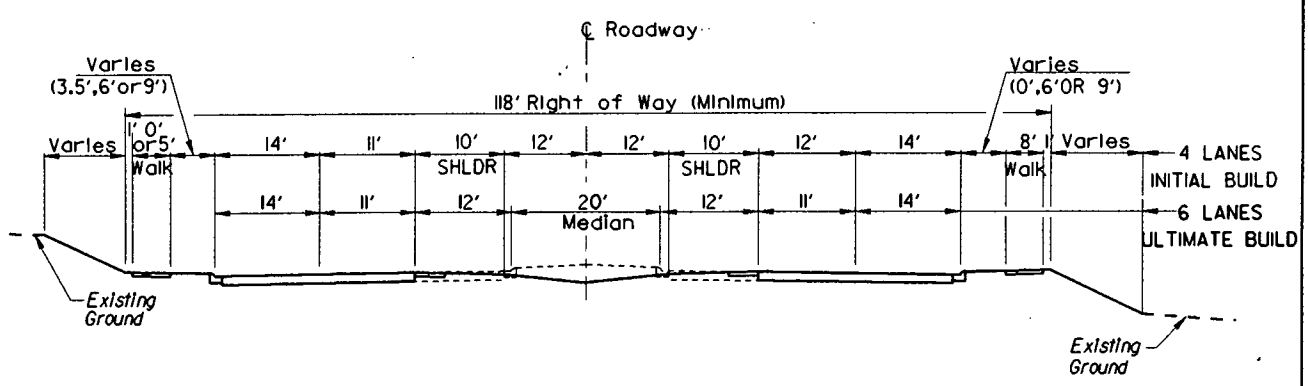
-  ROADWAY
-  WETLAND BOUNDARY
-  FOREST BOUNDARY
-  EXISTING RIGHT-OF-WAY
-  PROPOSED RIGHT OF WAY

STAGED CONSTRUCTION

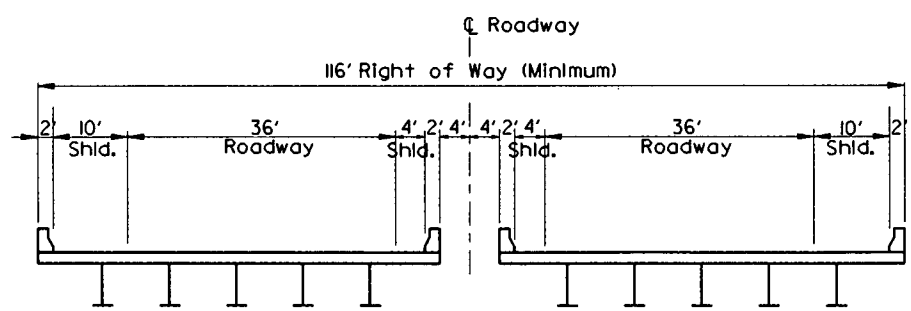
<b>MARYLAND ROUTE 355 EAST SHIFT</b>		
<b>ALTERNATE 3 6 LANE DIVIDED ALTERNATE</b>		
DWG NO	DATE	Figure 13
		SHEET NO 19B



### PROPOSED TYPICAL SECTIONS



### STAGED CONSTRUCT TYPICAL SECTION



### BRIDGE TYPICAL SECTION OVER GREAT SENECA CREEK

The dimensions shown are for the purpose of determining cost estimates and environmental impacts, and are subject to change during the final design phase.

MARYLAND ROUTE 355
ALTERNATE 3 TYPICAL SECTIONS
NOT TO SCALE

Figure 14

and sixth lanes with curb and gutter would be added to the median. Mainline features of Alternate 3 include three 11-foot travel lanes in each direction; a 20-foot-wide raised median; exclusive left turn lanes at median openings; and a 40 mph design speed.

- **East Shift:** This option shifts east of the existing centerline through county administered Great Seneca Extension Stream Valley Park, affecting this park instead of additionally impacting Seneca Creek State Park. This shift also avoids the higher quality wetlands on the west side of MD 355.
- **High Bridge:** This option proposes a new dual bridge with three travel lanes in each direction and a span length of approximately 320 feet. Based on preliminary hydraulic and hydrologic analyses, a high bridge of approximately this size can handle a 100-year storm event. The 320-foot structure has a 13.5-foot clearance to accommodate an equestrian underpass. In addition, there are 140 to 150 feet between the bridge abutment and the creek on the south side, and approximately 50 feet on the north side, creating a wildlife corridor. The existing low bridge will be removed.
- **Shoulder Widths:** This area is composed of an eight-foot sidewalk on the west side of the bridge only, to minimize park impacts, and graded areas of varying widths on both sides of the bridge.

The proposed alignment for the staged six-lane alternative generally follows the existing alignment but was improved to achieve safer operating characteristics for the present posted speed limit including upgrading the segment of the four/five-lane roadway between MD 27 and Middlebrook Road assumed to be constructed by an area developer, as well as the other planned and programmed improvements in the area.

**C. SERVICE CHARACTERISTICS OF THE SELECTED BUILD ALTERNATIVE**

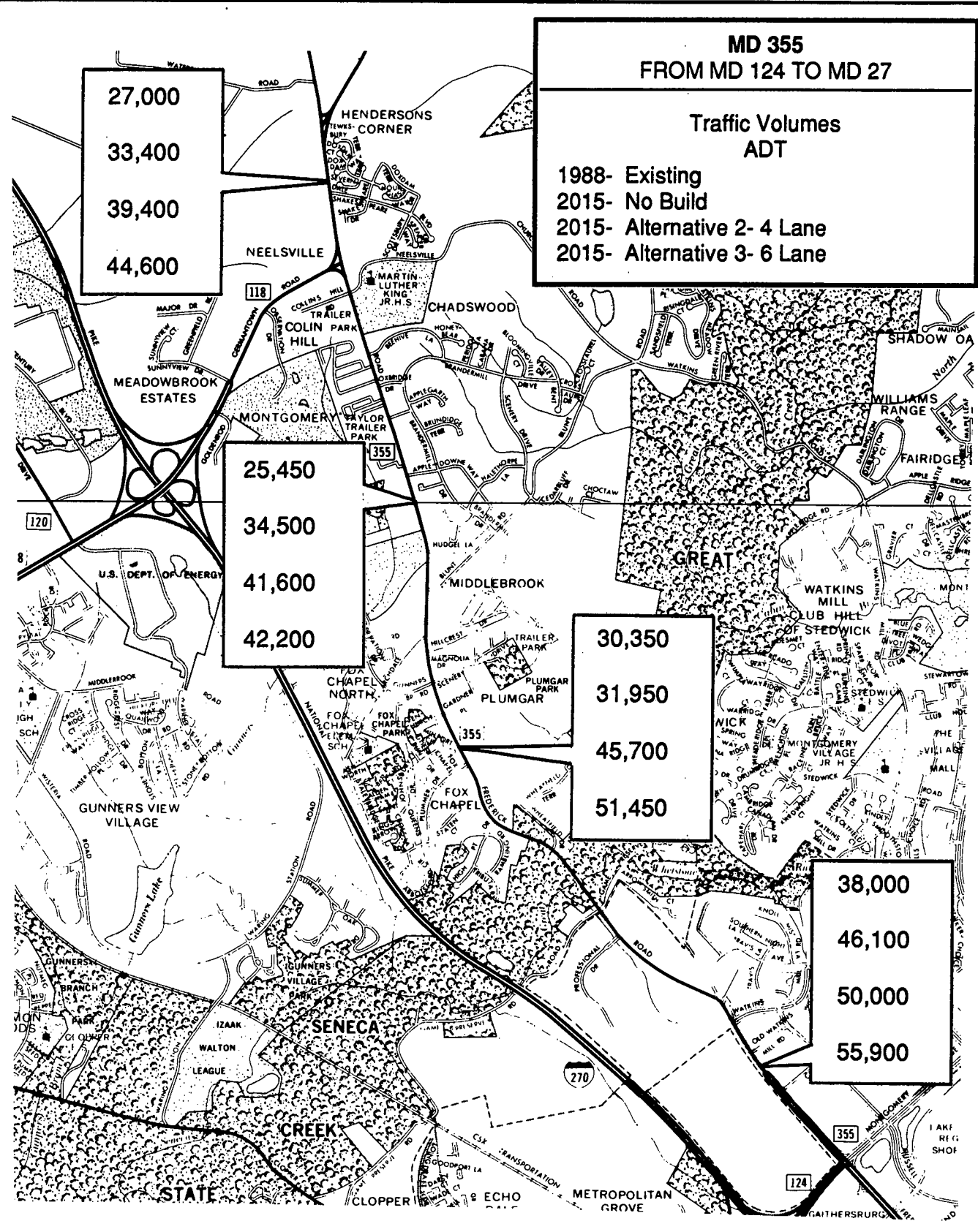
**1. Traffic**

For the MD 355 study area, current daily traffic volumes and peak hour volumes in both the A.M. and P.M. peak periods are shown below in Table 1. Figures 15 - 17 illustrate existing and Design Year 2015 traffic conditions in the study corridor at key intersections and along the major roadway segments.

**TABLE 1  
1988 TRAFFIC VOLUMES**

<u>Segment</u>	Daily Volumes	Peak Hour Traffic	
	<u>(ADT)</u>	<u>A.M.</u>	<u>P.M.</u>
Between MD 124 and Watkins Mill Road	38,000	1935	2175
Between Watkins Mill Road and Middlebrook Road	30,350	1655	2020
Between Middlebrook Road and MD 118	25,450	825	1235
Between MD 118 and MD 27	27,000	1395	1625

Projected 2015 design year daily traffic volumes and A.M. and P.M. peak period volumes for Alternate 3 are shown in Table 2. The traffic volumes shown assume M-83 will not be built.



### Maryland Route 355

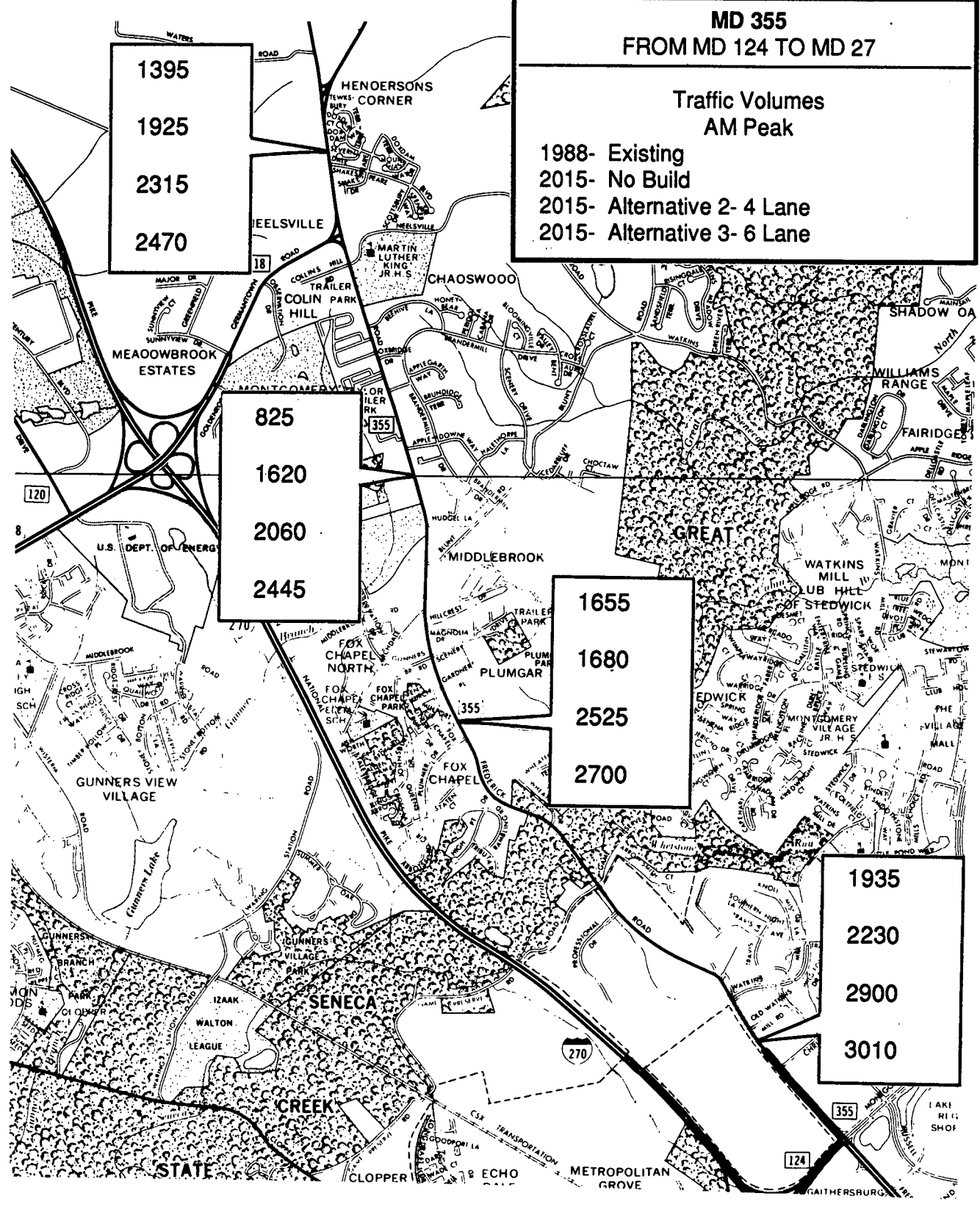
MD 27 TO MD 124

MARYLAND STATE HIGHWAY ADMINISTRATION

Figure 15

Existing and Projected  
Average Daily Traffic





**MD 355**  
**FROM MD 124 TO MD 27**

**Traffic Volumes**  
**AM Peak**

1988- Existing  
 2015- No Build  
 2015- Alternative 2- 4 Lane  
 2015- Alternative 3- 6 Lane

1395  
 1925  
 2315  
 2470

825  
 1620  
 2060  
 2445

1655  
 1680  
 2525  
 2700

1935  
 2230  
 2900  
 3010

**Maryland Route 355**

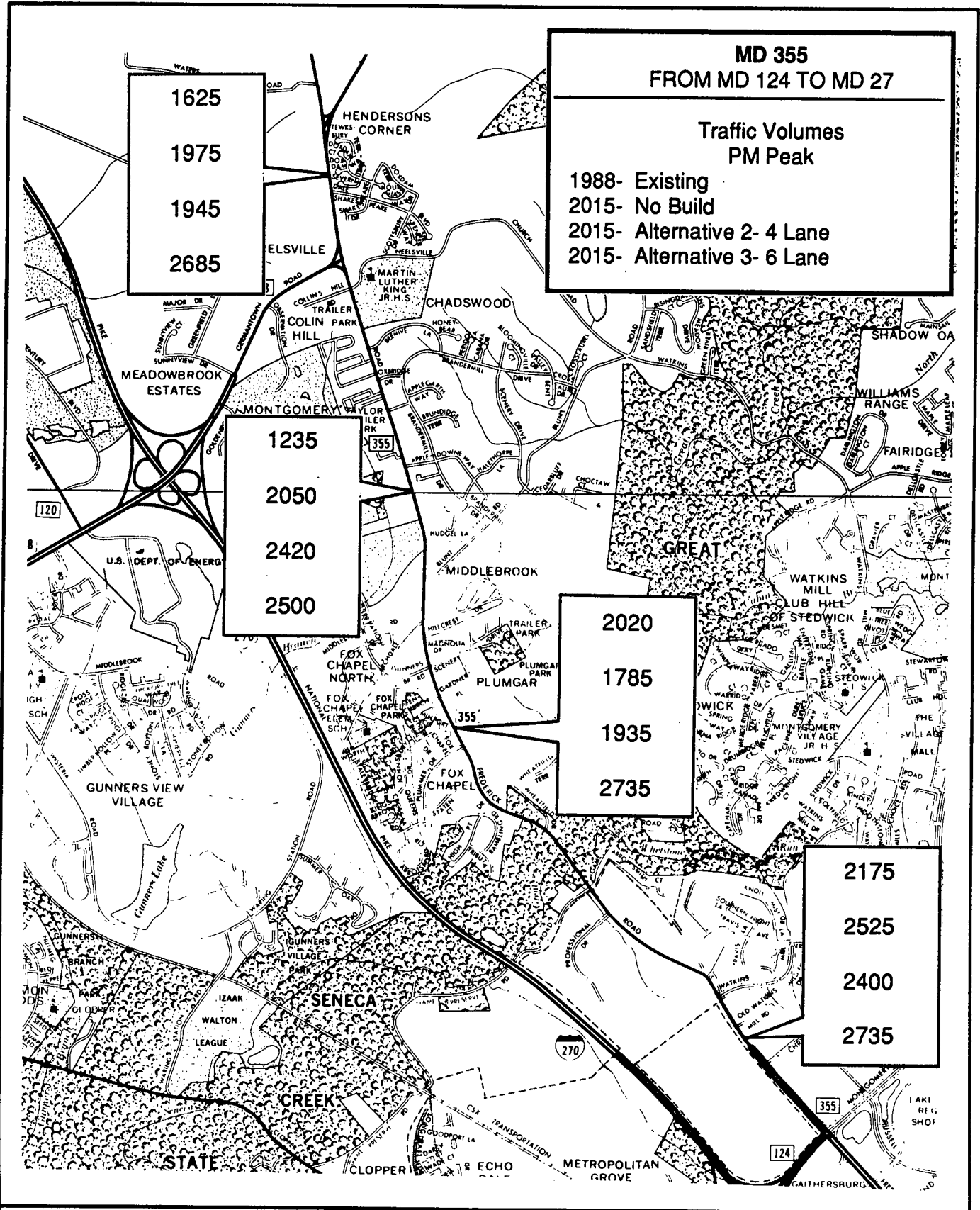
MD 27 TO MD 124

MARYLAND STATE HIGHWAY ADMINISTRATION

Figure 16

2015 A.M. Peak Hour  
 Traffic Volume for Each Alternate





**MD 355**  
**FROM MD 124 TO MD 27**

**Traffic Volumes**  
**PM Peak**

1988- Existing  
 2015- No Build  
 2015- Alternative 2- 4 Lane  
 2015- Alternative 3- 6 Lane

1625  
 1975  
 1945  
 2685

1235  
 2050  
 2420  
 2500

2020  
 1785  
 1935  
 2735

2175  
 2525  
 2400  
 2735

**Maryland Route 355**

MD 27 TO MD 124

MARYLAND STATE HIGHWAY ADMINISTRATION

Figure 17

2015 P.M. Peak Hour  
 Traffic Volume for Each Alternate

↑

**TABLE 2  
2015 TRAFFIC VOLUMES ALTERNATE 3**

<u>Segment</u>	<u>Daily Volumes (ADT)</u>	<u>Peak Hour Traffic</u>	
		<u>A.M.</u>	<u>P.M.</u>
Between MD 124 and Watkins Mill Road	55,900	3010	2735
Between Watkins Mill Road and Middlebrook Road	51,450	2700	2735
Between Middlebrook Road and MD 118	42,200	2445	2500
Between MD 118 and MD 27	44,600	2470	2685

Trucks currently compose 4 percent of the average daily traffic (ADT) and 2 percent of the design hour volume. These percentages are expected to remain basically the same for the design year of 2015.

Quality of traffic flow along a roadway is measured in terms of levels-of-service (LOS). Level-of-service is dependent upon highway geometry, highway capacity, and traffic characteristics and volumes. The Transportation Research Board's *Highway Capacity Manual*, defines LOS as follows:

- LOS A: Free Flow
- LOS B: Stable flow; the presence of others in the traffic stream begins to be noticeable
- LOS C: Stable flow; the presence of others in the traffic stream begins to significantly affect interactions
- LOS D: High density, stable flow; the presence of others in the traffic stream begins to severely affect speed and freedom to maneuver.
- LOS E: Operating conditions at or near the capacity level. All speeds are reduced to a low, but relatively uniform value.
- LOS F: Forced or breakdown flow.

Table 3 lists the signalized intersections along MD 355 with their corresponding LOS for both the A.M. and P.M. peak periods for the current level of traffic (1988). Table 4 lists the year 2015 intersection LOS for the No-Build and Alternate 3. Level-of-service for signalized intersections is defined in terms of an average 15 minute delay per vehicle.

LOS for intersections at roadways that intersect with MD 355, illustrated in Table 4, are improved under the selected alternative.

39

**TABLE 3  
MD 355 INTERSECTION LOS EXISTING TRAFFIC VOLUMES**

<u>intersecting Road W/MD 355</u>	LOS	
	<u>A.M.</u>	<u>P.M.</u>
MD 124 (Montgomery Village Avenue)	F	F
Christopher Avenue	F	D
Watkins Mill Road	F	F
Game Preserve Road	F	F
Middlebrook Road	B	D
MD 118	D	B
MD 27 (Ridge Road)	F	E

**TABLE 4  
MD 355 INTERSECTION LOS 2015 TRAFFIC VOLUMES**

<u>Intersecting Road W/MD 355</u>	No-Build		Alternate 3	
	<u>A.M.</u>	<u>P.M.</u>	<u>A.M.</u>	<u>P.M.</u>
MD 124 (Montgomery Village Avenue)	F	F	F	F
Christopher Avenue	F	F	E	C
Watkins Mill Road	F	F	E	E
Middlebrook Road	F	F	E	D
MD 118	F	F	F	E
MD 27 (Ridge Road)	F	F	E	E

Tables 5 and 6 indicate the LOS from roadway segments between signalized intersections for the No-Build and Alternate 3 in the Design Year 2015.

**TABLE 5  
LINK ANALYSIS LOS (NO-BUILD) 2015 TRAFFIC VOLUMES**

<u>Location</u>	A.M. LOS		P.M. LOS	
	<u>NB</u>	<u>SB</u>	<u>NB</u>	<u>SB</u>
South of MD 124	B	E	C	D
Between Christopher & Watkins Mill Road	B	D	E	C
Between Game Preserve Road & Middlebrook Road	F	F	F	F
Between MD 118 & MD 27	B	D	D	B

**TABLE 6  
LINK ANALYSIS LOS (ALTERNATE 3) 2015 TRAFFIC VOLUMES**

<u>Location</u>	A.M. LOS		P.M. LOS	
	<u>NB</u>	<u>SB</u>	<u>NB</u>	<u>SB</u>
South of MD 124	B	C	C	C
Between Christopher & Watkins Mill Road	B	D	C	B
Between Game Preserve Road & Middlebrook Road	B	C	C	B
Between MD 118 & MD 27	B	C	C	B

### Effects on Traffic Operations

Alternate 1 (No-Build) provides no major improvements to MD 355. As traffic volumes continue to grow, traffic delays and the length of peak hours will expand. It can be expected that if congestion increases over time, the rate of accidents will also increase.

As indicated in Table 4, all intersections will fail in the design year under the No-Build alternative. For Alternate 3 most intersections will still be at unacceptable levels of service (i.e., below LOS D). Tables 5 and 6 indicate the mainline links for several locations along MD 355 which generally show slight improvement under Alternate 3, especially between Game Preserve and Middlebrook Roads.

### 2. Transit

Transit within the study area will not be adversely affected by the selected alternative. Since this is a roadway project, rail transit such as WMATA and MARC will not be directly affected by the improvements, while bus services (Ride-On), ridesharing and paratransit will benefit from the addition of lanes to MD 355. Improved traffic flow, better road capacity and generally improved road conditions will have a positive affect on travel on MD 355.

### 3. Safety

The study area experienced a total of 547 accidents during the study period of 1988 through the fall of 1991. These accidents resulted in a rate of 332.3 accidents per every one hundred million vehicle miles of travel (acc/100 mvm) for the study period. This rate is higher, but not significantly so, than the state-wide average accident rate of 314.1 acc/100 mvm for all similarly designed highways under state maintenance. The accident cost to the motoring public from these accidents is estimated at approximately \$3.2 million/100 mvm.

The total accident experience is listed in Table 7 by year and severity. The weighted state-wide average rates for this type of design highway are also listed for comparison purposes. The accident rate and state-wide average are based on 100 mvm.

**TABLE 7  
TOTAL ACCIDENT EXPERIENCE**

<u>Severity</u>	<u>1988</u>	<u>1989</u>	<u>1990</u>	<u>1991</u>	<u>Total</u>	<u>Rate</u>	<u>State-wide Average Rate</u>
Fatal Accidents	0	0	1	2	2	1.2	2.1
Number killed	0	0	1	1	2		
Injury Accidents	90	98	81	45	314	*190.7	166.3
Number injured	141	148	140	64	493		
Property Damage Only	67	78	49	37	231	145.7	140.3
Total Accidents	157	176	131	83	547	332.3	314.1

*\*Significantly higher than state-wide average 1991; data are through October only.*



Accidents by collision type and conditions experienced within the study area, in comparison to their respective state-wide average rates for this type of highway (based on 100 mvm), are listed in Tables 8 and 9.

**TABLE 8  
COLLISION TYPES AND NUMBER**

<u>Collision Type</u>	<u>Total Number</u>	<u>Accident Rate</u>	<u>State-wide Average</u>
Angle	94	57.1	54.5
Rear End	175	106.3*	84.9
Fixed Object	51	31.0	40.6
Opposite Direction	24	14.6	13.0
Sideswipe	30	18.2	22.2
Left Turn	107	65.0*	36.9
Pedestrian	14	8.5	8.6
Parked	1	0.6	8.6
Other	51	31.0	38.0

*\*Significantly higher than state-wide average*

**TABLE 9  
ACCIDENT CONDITIONS**

	<u>1988 to Oct. 1991</u>	<u>% of Total Accidents</u>	<u>State-wide %</u>
Nighttime Accidents	170	31.1	33.3
Wet Surface Accidents	185	33.8*	22.6
Alcohol Related Accidents	54	9.9	10.4

*\*Significantly higher than state-wide percentage*

Rear-end and left-turn accidents occurred at a significantly high rate. Angle and opposite-direction accident rates were high, but not significantly so. Also, a disproportionate number of accidents took place during wet surface conditions. Middlebrook Road (13 accidents in 1988) and MD 355 at Gunners Branch/Scenery Drive (12 accidents in 1989) qualified as high accident intersections.

Under the No-Build alternative, previously mentioned conditions would be expected to continue. The addition of lanes and medians under Alternate 3 will generally lower the overall accident rate. The projected accident rate for this alternative is 317.3/100 mvm, which would generate an estimated accident cost of \$3.2 million/100 mvm. Compared to the existing geometrics, this should create a decrease in the accident rate of 15.0 acc/100 mvm, while accident costs should remain comparable.

**D. ENVIRONMENTAL CONSEQUENCES OF THE SELECTED ALTERNATE**

An Environmental Assessment was signed and approved by the Federal Highway Administration on August 27, 1992.

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The following section discusses the potential environmental impacts associated with the Selected Build Alternative. Minimization of impacts has been a primary goal in the development of Alternate 3 staged construction.

### **1. Socioeconomic And Land Use Issues**

The social and economic environment will be improved generally as a result of increased capacity and safer roadway and pedestrian conditions. In localized areas, however, access may be changed or hindered. Residential and commercial displacements will occur under the build alternative although retaining walls have been used to reduce this number. Alternate 3 results in a total of 12 displacements; eight residences and four businesses. If comparable replacement dwellings are not available within the usual monetary limits, additional amounts will be provided through Replace Housing of Last Resort in order to assure that comparable replacement homes will be affordable to displaced persons. Businesses are more difficult to relocate, however, there are sufficient replacement sites available. To avoid undue disruption to residences and businesses in the study area, all relocation and right-of-way acquisition will occur at one time. The length of the project will eventually be widened to six lanes. Although specific house to house occupancy data are not available, it is believed that several elderly families may be affected by the selected alternative and appropriate relocation advisory services will be offered to displaced elderly and handicapped individuals.

Approximately 26.2 acres of additional right-of-way will be needed to accommodate the selected build alternative. Specific land use impacts include an adverse affect (approximately 0.28 acres) to the Seneca Center Business Development, which lies just south of Great Seneca Extension Stream Valley Park on the east side of MD 355. Alternate 3 impacts 22 parking spaces at Seneca Center, for a total cost of \$33,000. Further, a berm placed in front of the Brandermill development on SHA property in recent years will be displaced. The developer may replace the berm with a wooden fence.

Traffic patterns for area residents will be significantly changed by the selected build alternative through the introduction of mainline medians, limited access points to the mainline, and "U" turns for use by residents needing roadway crossovers. While there will be an initial adjustment to this changed traffic pattern, the long term benefits of improved traffic flow and reduced accident rates outweigh the short-term effects.

This project is consistent with the transportation elements of the Montgomery County master plans governing this project area: specifically the Germantown Master Plan, 1989; and the Gaithersburg Vicinity Master Plan, 1985.

#### Growth Management Act Consistency Determination

The selected alternative, Alternate 3, was evaluated for consistency with the Economic Growth, Resource Protection and Planning Act of 1992 (Growth Management Act). In accordance with the Growth Management Act, a Consistency Report was filed with the Maryland Office of Planning in September, 1993. The project was found to be consistent.

a. Relocation

Relocation of any individuals, families, or businesses displaced by this project will be accomplished in accordance with the Uniform Relocation Assistance and Land Acquisition Policies Act of 1970, as amended by the Surface Transportation and Uniform Relocation Assistance Act, of 1987, and would be affected in a timely and humane fashion. State and Federal laws require that before commencing an action which will cause displacements, the State Highway Administration will scope the complexity of the displacing activity and resources available to carry out timely and orderly relocations. The State Highway Administration, Office of Real Estate will need 18 months from receipt of approved right-of-way plats to accomplish the acquisitions and relocations on this project.

In the event comparable replacement housing is not available within the monetary limits for displaced owners and tenants, or available replacement housing is beyond their financial means, Replacement Housing of Last Resort will be utilized. A summary of *The Relocation Assistance Program of the State of Maryland* is given in the appendix of this document.

**Title VI Statement**

**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 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 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 Equal Opportunity Section of the Maryland State Highway Administration for investigation.

b. Parklands

Public parkland adjacent to the Great Seneca Creek bridge crossing will be affected by the build alternative. Alternate 3, with an east shift into Great Seneca Extension Stream Valley Park will require approximately 4.7 acres of right-of-way from the park. The build alternative accommodates pedestrian/bicycle access which will connect the State and County parks, as well as equestrian movement and a wildlife corridor underneath the bridge.

All right-of-way from the parkland would be acquired in fee simple. A more detailed discussion of impacts to these parklands, including the comparative analysis of required right-of-way and effects on the natural resources of these parklands is included in the Section 4(f) Evaluation, Section III.

**c. Historic and Archaeological Resources**

The State Historic Preservation Officer has determined that one historic site (Neelsville Presbyterian Church) which is eligible for the National Register of Historic Places is located in the project area. Right-of-way will not be required from the Neelsville site. The SHA has received a determination of no adverse effect on this historic site from the Maryland Historical Trust (MHT) (see letter dated 8/20/92 on, page VI-47). A Phase I archaeological survey has been completed and three archaeological sites were identified. MHT has determined that the sites do not have the potential to yield important information and concurs that they are not eligible for inclusion on the National Register (see letter dated 6/18/92, page VI-45).

**d. Pedestrian/Bicycle Facilities**

Alternate 3 includes, as part of the design, allowance for pedestrians and bicycles. There will be an eight-foot hiker/biker trail on the west side of the alignment and a five-foot sidewalk on the east side. This is consistent both with the Montgomery County Comprehensive Plan and developer improvements to MD 355 in the northern portion of the study area.

**2. Natural Environment**

**a. Geology, Topography, and Soils**

The build alternative will not substantially change the existing topographic conditions nor impact the underlying geological structures along the MD 355 corridor. There will be some disturbance of soils, noticeably erosion and sedimentation during construction. Measures to mitigate these effects include structural, vegetative and operational methods which will be developed as part of a Soil Erosion and Sediment Control Plan for the project, to be prepared in accordance with the *Maryland Standards and Specifications for Soil Erosion and Sediment Control*. Long term soil impacts will be negligible.

**b. Surface Water**

No portions of Great Seneca Creek will be relocated as a result of the road widening.

**c. Floodplains**

Construction will partially occur within the 100-year floodplain of Great Seneca Creek and will require the filling of approximately 2.0 acres. Additional hydraulic and hydrologic analyses were undertaken to determine structure design to minimize impacts to the floodplain and water quality. This resulted in the selection of a 320-foot bridge which will cause a water surface increase upstream of less than one-tenth of one foot.

**d. Wetlands**

Pursuant to Executive order 11990 and Section 404 of the Clean Water Act, wetland areas potentially affected by the proposed project have been identified. Federal, state and local regulations require mitigation and/or compensation for loss of wetland habitats. A joint federal and state Section 404 Corps of Engineers permit will be required for any disturbance to wetlands associated with Alternate 3. In addition, Executive Order 11990 requires that efforts be made to avoid or minimize harm to wetlands in

the project corridor. Replacement wetlands will be created as close to the disturbed wetlands as possible at the specified replacement ratio.

The selected alternative, Alternate 3, affects approximately 1.34 acres of non-tidal wetlands in the study corridor (see Table 10). Of these, the east shift over Great Seneca Creek includes encroachment on 0.7 acres of wetlands. The difference in wetland impacts between crossing Great Seneca Creek with a 320-foot bridge or a 400-foot bridge is approximately 0.07 acres.

Wetlands Minimization and Avoidance

Wetlands avoidance and minimization for Alternate 3 will be achieved by keeping the widening as close as possible to the roadway's existing centerline. Because parts or all of the three wetlands are perpendicular to MD 355, avoidance is impossible under the build alternative. Alignment shifts were considered through Seneca Creek State Park and Great Seneca Extension Stream Valley Park on the west and east sides of MD 355 respectively.

Minimization has been achieved by exploring a number of alternatives through this area to provide horizontal and vertical designs that tie into existing MD 355 right-of-way as soon as possible and minimize cut/fill slopes. Retaining walls were also considered at critical locations to reduce impacts to wetlands in the vicinity of Great Seneca Creek; these have since been dropped from consideration upon consultation with the environmental agencies. Upon examination, it was discovered that impacts to W1 and W2 were only reduced by less than 0.1 acres to 0.6 acres with the retaining walls and the cost of retaining walls ranged between approximately 0.6 million dollars to 1.3 million dollars.

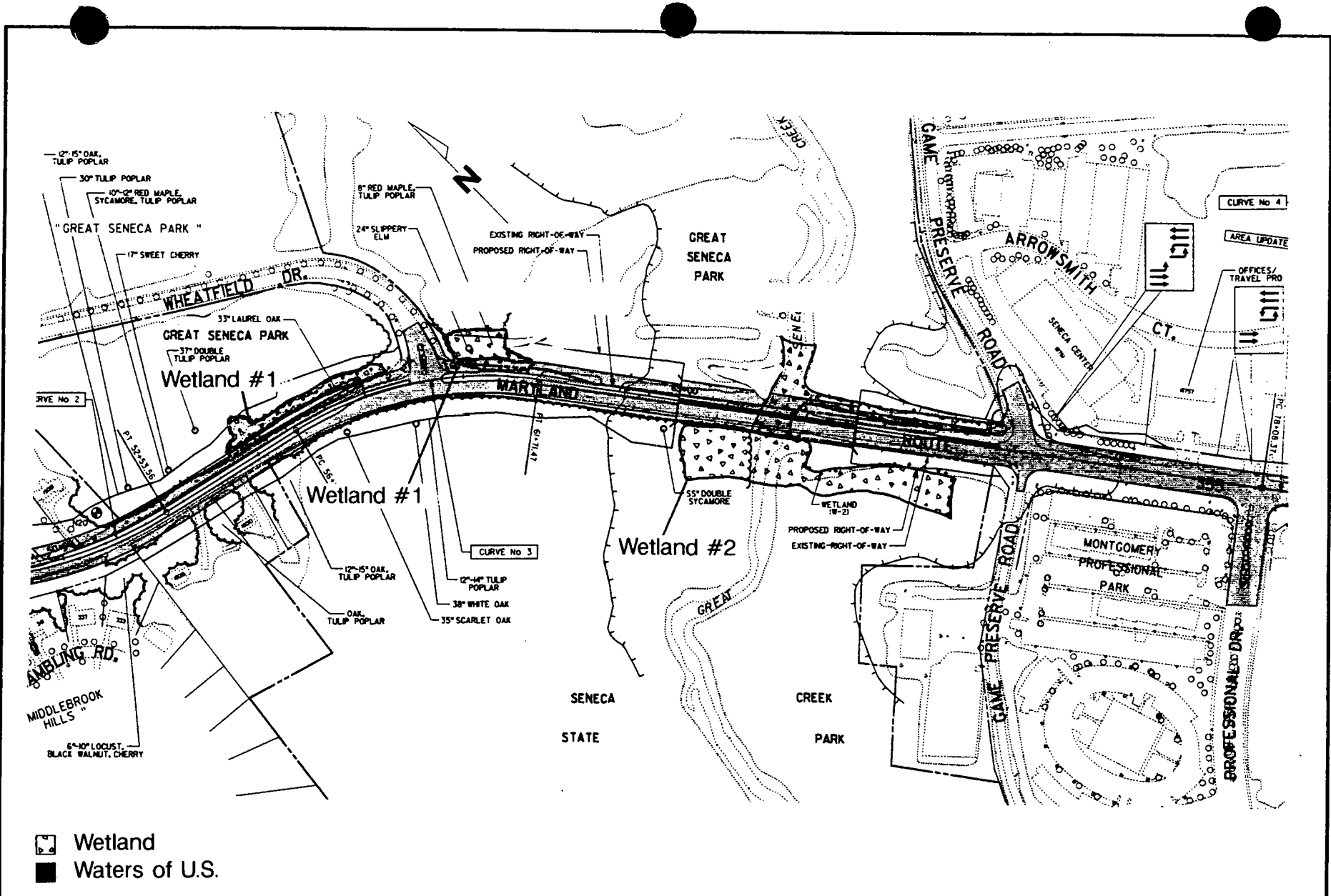
**TABLE 10  
AFFECTED WETLANDS**

Alternative	Geographical Location	East W1	East W2	West W3	Total
6 Lane, East Park Cut/Fill Slopes	shifts east into Great Seneca Extension Stream Valley Park	0.33	0.36	0.65	1.34

WETLAND W1

Wetland 1 (W1), a palustrine forested wetland (PF01A), is located on the east side of MD 355 (see Figure 18a). It begins in a swale north of Wheatfield Road, and runs south beneath Wheatfield Road towards Great Seneca Creek and consists of swales and an intermittent stream. The dominant vegetation found includes tulip poplar, spice bush, arrowwood, multi-floral rose and jewelweed. Other species found were slippery elm, ironwood, and carex species. The soil is saturated and has a low chroma. This wetland performs the function of short-term sediment trapping.

Alternate 3 affects 0.33 acres of W1.



- Wetland
- Waters of U.S.

**Maryland Route 355**  
 MD 27 TO MD 124  
 MARYLAND STATE HIGHWAY ADMINISTRATION

Figure 18a  
**Project Wetlands**

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Avoidance

For Alternate 3, alignment shifts were considered through Great Seneca Extension Stream Valley Park on the east side of MD 355 and Seneca Creek State Park on the west side of MD 355. The east park shift through the Great Seneca Extension Stream Valley Park, results in the loss of all of W1, as its entire 0.33 acres falls within cut and fill limits of this option. A west shift option would avoid any impact to W1. This shift, however, results in the following impacts: 2.02 acres of wetlands in W2 and W3 which are of higher functional value than W1; 4.4 acres of woodlands and floodplain impacts of 2.6 acres.

Minimization

Alternate 3 will use a 40 mile per hour (mph) instead of a 50 mph design speed, which is a more desirable design speed. The 40 mph design speed minimally reduces overall impacts throughout the design. Additional minimization techniques that will be undertaken during construction will:

- Utilize design and construction techniques to minimize disturbance of the wetland and to minimize erosion and sedimentation;
- Narrow the roadway section through bridge crossing to minimize wetland encroachment.
- Retaining walls in the park at W1 were considered. A retaining wall would reduce impacts by 0.1 to 0.6 acres at a cost of \$0.6 million to \$1.3 million dollars. However, the environmental agencies requested that SHA not pursue any retaining walls in the park locations because of the passive nature of the area and the high cost and low savings of wetlands (see Department of Natural Resources letter dated 10/13/92 on page VI-49).

**WETLAND W2**

Wetland 2 (W2) includes Great Seneca Creek, its floodplain and the narrow rock-lined roadside ditches that carry seepage and stormwater from MD 355 (see Figure 18a). The creek and floodplain are classified as a palustrine forested (PF01A) wetland, while the roadside ditches are palustrine emergent (PEM1A). Dominant vegetation include: box elder, green ash, black willow, silky dogwood, arrowwood, false nettle, jewelweed, and soft rush. The alluvial soils are gleyed and mottled. The wetland functions as active and passive recreation, habitat for aquatic wildlife and fisheries, flood desynchronization, long-term nutrient retention and removal and long term sediment trapping.

Impacts to W2 under Alternate 3 equals 0.36 acres with the high bridge option.

Avoidance

A west park shift of Alternate 3 is an avoidance option for W2. However, this shift will impact 1.04 acres of the greater valued wetlands within Seneca Creek State Park on the west side. The east shift through Great Seneca Extension Stream Valley Park minimally decreases impacts to W2, with an impact of approximately 0.36 acres.

Minimization

The crossing of W2 at Great Seneca Creek was designed to minimize the length of the impacted area by crossing the stream on the perpendicular. In addition, the width of the selected bridge was specifically

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designed to reduce the projected area of impact for W2. It is eight feet narrower than the adjacent typical section which has a 20-foot median that accommodates left turn lanes; these left turn lanes are not necessary at the creek crossing. Alternate 3 uses a 40 mph (versus 50 mph) design speed to minimally reduce overall impacts throughout the design. Other measures include utilizing design and construction techniques to minimize disturbance of the wetland and to minimize erosion and sedimentation.

**WETLAND W3**

Wetland 3 (W3), an intermittent stream and small floodplain located on the west side of MD 355 south of Professional Drive, is classified as both a palustrine emergent (PEM3A) and a palustrine forested (PF01A) system (see Figure 18b). Dominant vegetation includes red maple, black willow, spice bush, joe pye weed, ironweed, false nettle, and narrow-leaved boneset. The soils are alluvial and mottled with low chroma. This wetland functions as flood desynchronization, long-term nutrient retention and removal, and long-term sediment trapping. Alternate 3 affects 0.65 acres of W3.

Avoidance

The impacts to W3 occurring under the Alternate 3, east shift are approximately 0.65 acres. The east shift and straight options minimize impacts to the forested portions of W2 and W3. Comparatively, the wooded wetlands on the west side of MD 355, within Seneca Creek State Park, occupying the more intact floodplains forest, are of greater quality than the wetlands on the east side of MD 355 within Great Seneca Extension Valley Park, primarily occupying a riprap channel.

Retaining walls have no additional impact on W3 than the cut/fill slopes under all the options. Due to the location of W3, a shift through Seneca Creek State Park on the west would have greater impacts to W3 than the east shift (0.98 acres versus 0.65 acres). On the other hand, although a shift through Great Seneca Extension Stream Valley Park would reduce impacts to W3, the reduction would be too minimal to justify additional land use impacts to the Seneca Center Business Development, which lies just south of Great Seneca Extension Stream Valley Park to the east of MD 355. The approximate 0.28 acres affected under Alternate 3 will displace 22 parking spaces at Seneca Center, for a total cost of \$33,000.

Minimization

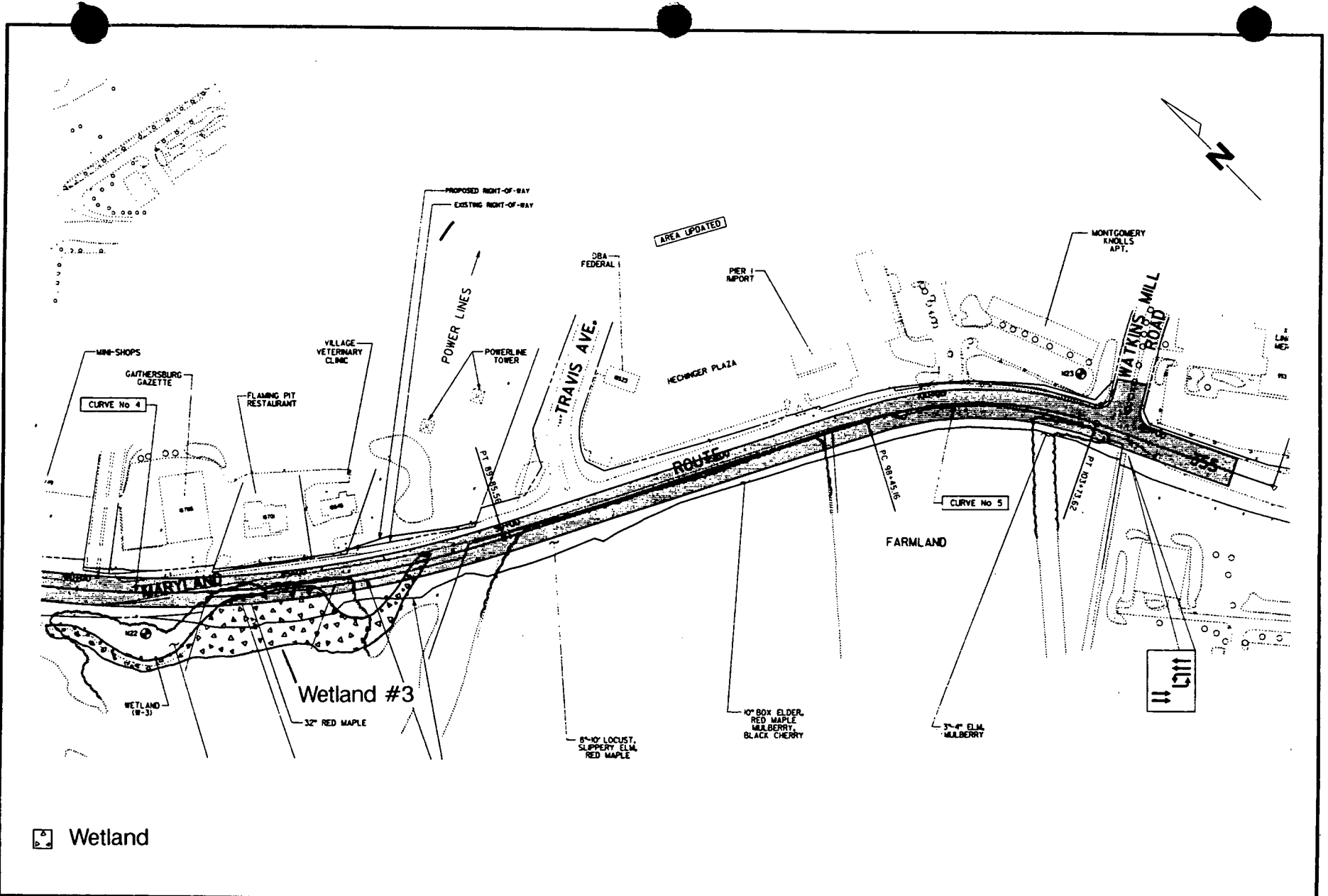
For Alternate 3, the use of 40 mph versus 50 mph for design speed, minimally reduces overall impacts through the design. Additional measures to minimize impacts to W3 that will be undertaken during final design and construction of the selected alternate are discussed under Wetland 1 (W1) above.

Wetland Mitigation

Replacement of impacted wetland acreage will be implemented as directed by federal and state regulations. Avoiding or minimizing potential alterations to the wetlands identified along the project corridor will be necessary during project construction.

The following wetland replacement site will be used as compensatory mitigation to offset wetland impacts permanently lost due to construction of the project (see Figures 19 and 20). The Hawkins site has had a Section 106 review, an environmental inventory and has been cleared by the state





**Maryland Route 355**

MD 27 TO MD 124

MARYLAND STATE HIGHWAY ADMINISTRATION

Figure 18b

**Project Wetlands**

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environmental agencies and the FHWA (see Wetland Mitigation Comments and Coordination section, on pages VI-107 to VI-115).

**HAWKINS SITE**

Location: Northwest of Goshen Branch Park, Montgomery County  
 Topography: Agricultural grassland  
 Soils: Hatboro silt loam, Baile silt loam  
 Hydrology: Fluctuating water table (2-4 feet below ground surface)  
 Acreage: 30 acres

The Hawkins property is approximately two miles west of the Town of Laytonville, which is approximately four miles east of the project area. MD 355 and the Hawkins site are both in the Seneca Creek Drainage segment of the Washington Metropolitan Area sub-basin watershed. The site includes 30± acres of agricultural grassland within the 100-year floodplain of Goshen Branch, which is a Class I stream. The contributing watershed of Goshen Branch at the mitigation site is approximately 2,460 acres and is characterized by agricultural uses and single-family dwelling units. Land uses surrounding the Hawkins property include residential, agricultural, open space for a developer's project and a park. SHA owns the site and intends to create wetlands on it.

Two unnamed tributaries of Goshen Branch enter the mitigation site from the north. Tributary 1, located just northeast of Huntmaster Road, appears to have been channelized for agricultural drainage. It is incised approximately four to six feet and is eight to ten feet wide at the top of the bank. Tributary 1 has an upstream drainage area of approximately 108 acres. Tributary 2 is located in the far northeast end of the site and is generally incised two to four feet, and is three to four feet wide. The upstream drainage area for Tributary 2 is approximately 207 acres.

Soils on the mitigation site are mapped in the *Soil Survey of Montgomery County* (1990 update) as Hatboro silt loam (Typic Fluvaquent) and Baile silt loam (Typic Ochraquult). Both soils are poorly drained and are classified as hydric, however, on-site soil investigation revealed that the floodplain is generally characterized by moderately well drained soils. A typical soil profile in the mitigation area is dark yellowish brown (10YR 4/4) silt loam to a depth of eight inches, underlain by yellowish brown (10YR 5/4) silt loam to twenty inches. The upper part of the subsoil from twenty to thirty-two inches is brown (10YR 5/3) silt loam, with common, fine, distinct yellowish red (5 R 5/6) mottles. The lower part of the subsoil to a depth of forty-two inches is yellowish brown (10 YR 5/6) gravelly clay loam, with few, moderate, distinct brownish yellow (10 YR 6/8) mottles. In general, soils on the mitigation site more closely resemble Codorous silt loam, a moderately well drained floodplain soil mapped in Montgomery County in similar fluvial landscape positions.

Water table investigations revealed a fluctuating water table from two to four feet below the ground surface. These water table observations support the findings of moderately well drained soils on most of the site.

**e. Threatened and Endangered Species**

No known federal or state listed threatened or endangered species exist within the project area.

f. **Prime and Unique Farmland**

Prime farmland soils and soils of state-wide importance are located in the project study area. Approximately 14 acres will be affected under the selected build alternative. However, this acreage is zoned for residential or commercial development.

g. **Terrestrial Habitat**

The destruction of naturally existing vegetation -- hedgerows, forest and fields -- will amount to a total of 8.4 acres of affected woodland/forest affected under Alternate 3. The project will abide by the rules and regulations concerning reforestation in accordance with The Forest Conservation Act of 1991 which includes Section 2 (the "Reforestation Act"). Under the Reforestation Act of 1989, SHA is required to replace, one for one, any impacted forest greater than one acre. As a last resort, if there are no reforestation sites within the County or the watershed, SHA may pay into a fund for reforestation activities.

h. **Stormwater Management**

The use of Best Management Practices (BMPs) and sound stormwater management will be implemented with the project, both during construction when sedimentation may occur due to clearing and excavation, and in the operation of the completed roadway.

Stormwater runoff for the project will be managed in accordance with the State of Maryland Department of the Environment's *Stormwater Management Guidelines for State and Federal Projects*.

i. **Air Quality**

The objective of this air quality analysis is to compare the carbon monoxide (CO) concentrations estimated to result from the traffic configurations and volumes of the build alternative with the State and National Ambient Air Quality Standards (SAAQS/NAAQS). These standards are not exceeded under Alternate 3. An Air Quality Technical Report was prepared as part of the Environmental Assessment (EA) for this project. Additional information is found in Section IV.g of the EA document.

The construction phase of the project has the potential for impacting the ambient air quality through such means as fugitive dust from grading operations and materials handling. The SHA has addressed this possibility by establishing *Standard Specifications for Construction and Materials*. These procedures will be followed during construction.

j. **Noise**

The noise analysis was completed in accordance with FHWA Noise Abatement Criteria and 23 CFR, Part 772. The factors considered in identifying noise impacts are: identification of noise sensitive land uses, existing noise levels, prediction of future design year noise levels, and potential traffic increases.

The projected noise levels under the build alternative will equal or exceed the Federal Highway Administration (FHWA) Noise Abatement Criteria (67 dBA) at 16 of the 21 identified noise sensitive areas, therefore, five noise sites are not mitigated.

Feasibility of Noise Abatement

Abatement measures were evaluated for Alternate 3 in terms of their feasibility and reasonableness in substantially reducing the predicted design year noise levels. These alternative abatement measures include:

- Traffic management procedures;
- Alteration of roadway horizontal or vertical alignments;
- Acquisition of undeveloped property for use as buffer zones; and
- Installation of noise barriers/berms within the right-of way.

The only reasonable abatement measure available consists of erecting noise barriers within the right-of way. Noise abatement should provide a substantial reduction in noise levels, should be cost effective, and should be implemented in a practical manner without limiting accessibility.

Noise Barrier Analysis

This analysis, considered for the 16 noise receptors exceeding FHWA criteria, determines the reduction of noise obtainable through the construction of noise barriers of various lengths and heights located at the shoulder of MD 355 at impacted areas where barrier construction is reasonable and feasible. A total of seven noise barriers ranging from 350 feet to 1400 feet in length are recommended for further consideration along portions of MD 355 in the project study area.

- Receptor N-2 lies on the right-of-way to the undeveloped land just north of Ridge Road. Mitigation is not warranted for this land use.
- Receptor N-3 represents the eight homes adjacent to MD 355 between MD 27 and Shakespeare Blvd which are impacted by the project. A 1,400-foot-long noise barrier was modelled along the eastern shoulder of the proposed roadway. A height of ten feet effectively reduces noise levels for all eight residences by 11 dBA. The total cost of the barrier is \$224,000 with a cost of \$28,000 per impacted residence protected and will be studied further during design. This barrier would also provide some noise attenuation to the other houses in this area which are not included in the number of impacted properties since noise levels at these residences are predicted to fall below 67 dBA.
- Receptor N-4 lies on the right-of-way to the undeveloped land just north of Germantown Road. Mitigation is not warranted for this land use.
- Receptor N-6 represents five homes along the west side of MD 355 between Germantown Road and relocated MD 118. A series of short barriers along the shoulder of the proposed roadway with gaps between them will not be acoustically effective, reducing noise levels by 3 to 5 dBA. Such gaps are necessary to provide access to the driveways and to local streets intersecting MD 355. Barrier construction in this area is not feasible for this reason.
- A barrier was tested along relocated MD 118 to mitigate noise impacts to residences in the Oakcrest Trailer Court (N-8). The barrier does not substantially reduce noise levels since traffic on MD 355 is the dominant noise source. Also, driveway intersections do not permit barrier construction along MD 355 in this area.



- ⊙ Receptor N-9 represents the 12 townhouses in the three buildings on the east side of the proposed roadway between Towncenter and Oxbridge Drives. A 500-foot-long barrier, 12 feet high, would effectively reduce noise levels by 11 dBA. The barrier is cost effective at a total cost of \$96,000, \$8,000 per residence protected, and will be studied further during design.
- ✦ Receptor N-10 represents the Cider Barrel building situated along the west side of MD 355. Barrier construction in this area is not acoustically effective due to driveway intersections with MD 355. A segmented barrier would only reduce levels by 3 dBA. The barrier is not considered reasonable.
- ⊙ Receptor N-11 represents the 33 townhouse units in the eight buildings nearest MD 355 between Oxbridge Drive and Appledowre Way. A 1250-foot barrier of varying heights was tested along the east side of the proposed roadway. A 10-foot-high barrier was found to effectively mitigate noise by 11 dBA at 32 of the 33 residences impacted. The cost of the barrier is \$200,000, \$6,250 per impacted residence protected and will be studied further during design.
- ⊙ Receptor N-12, on Frederick Road, along the west side of the proposed roadway is the only impacted property in this area. A 300-foot-long, ten-foot-high barrier was tested between Appledowre Way and the entrance to the Cider Barrel Mobile Home Park. The barrier reduced noise levels at the property by 7 dBA. Barrier construction for this residence is not cost effective with the cost of the barrier being \$48,000.
- ⊙ Receptor N-13 represents 18 townhouses in the six buildings adjacent to MD 355 in the Brandermill Community between Appledowre Way and Hudgel Lane. An 800-foot-long, 10-foot-high barrier effectively mitigates noise by 10 dBA from the proposed roadway for all 18 residences. The barrier is cost effective at \$128,000, \$7,111 per impacted residence protected, and will be studied further during design.
- ✦ Receptor N-15 represents the three residences on the east side of MD 355 between Hillcrest Drive and Scenery Drive. The intersections of driveways and local streets with the proposed roadway prevent the construction of an acoustically effective noise barrier. A segmented barrier would only reduce levels from 2 to 5 dBA at the three homes. This barrier is not considered reasonable.
- ✦ Receptor N-16 represents the eight residences to the north and south of Gardner Place on the east side of MD 355. Local streets and driveway intersections prevent the construction of a continuous and acoustically effective barrier reducing noise levels by only 2 to 5 dBA at the residences. This barrier is not considered reasonable.
- ⊙ Receptor N-17 represents the ten first row houses between Chapel Gate Road and Millport Circle along the west side of MD 355. Receptor N-17A (see Table 11) represents the five residences between Gunner's Branch Road and Chapel Gate Road. Barriers of varying heights were tested in both areas. An 800-foot-long, 14-foot-high barrier is needed to reduce noise levels by 10 dBA between Chapel Gate and Millport Circle. The cost of this barrier is \$179,200. A 12-foot-high, 350-foot-long barrier between Gunner's Branch and Chapel Gate reduces noise levels by 10 dBA. The cost of this barrier is \$67,200. Both barriers are cost effective at \$17,000 and \$13,440 per impacted residence, respectively, and will be studied further during design.
- ✦ <sup>N-17A?</sup> Receptor N-18 represents the three houses north of High Point Drive and Receptor N-18A represents the six houses south of Highpoint Drive on Rambling Road. Driveway access to the north of Highpoint Drive prevents the construction of an acoustically effective barrier, reducing noise levels by only 1 dBA. This barrier is not considered reasonable. A 450-foot-long barrier, for the residences on Rambling Road, was modelled and found to reduce noise levels by 10 dBA at a height of 12 feet. The cost of the barrier is \$86,400, \$17,280 per impacted residence protected, and will be studied further during design.

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- Noise impacts at Great Seneca Park (N-19) due to the proposed roadway would be effectively mitigated with two 1100-foot-long barriers, one on the northbound side and one on the southbound side of the proposed roadway. A four-foot-high structural barrier is recommended on both sides of the 400-foot bridge span along with eight-foot-high barriers for the rest of the length of the park. The total cost of all barriers at the Park is \$224,000. Since every 125 feet of linear impact to a park is considered one impacted property, the two barriers are cost effective at \$12,444 per impacted property protected. Both barriers would have been studied further during design, however, due to the passive nature of the park, the environmental agencies requested that noise barriers not be used at this location.
- Receptor N-20 lies on the right-of-way to the undeveloped land south of Professional Drive. Mitigation is not warranted for this land use.

**TABLE 11  
SUMMARY OF NOISE MITIGATION ANALYSIS**

Receptor (Mitigation)	Land Use	Ambient Levels $L_{eq}$ (dBA)	2015 Build	Barrier Length (feet)	Barrier Height <sup>1</sup> (feet)	Mitigated Noise Levels	Total Cost of Barrier	Number of Properties Protected	Cost of Barrier/Residence
N-1 (A)	Undeveloped	62	66						
N-2 (A)	Undeveloped	69	72						
N-3	Residential	59	67	1400	10	56	\$224,000	8	\$28,400
N-4 (A)	Undeveloped	69	74						
N-5 (A)	Church	61	64						
N-6 (B)	Residential	68	72						
N-7 (C)	School/play field	63	66						
N-8 (B)	Residential	55	67						
N-9	Residential	62	69	500	12	58	\$96,000	12	\$8,000
N-10 (B)	Historic Building	67	70						
N-11	Residential	59	71	1250	10	60	\$200,000	32	\$6,250
N-12 (D)	Residential	68	69						
N-13	Residential	58	70	800	10	60	\$128,000	18	\$7,111
N-14 (A)	Residential	57	62						
N-15 (B)	Residential	63	67						
N-16 (B)	Residential	67	70						
N-17	Residential	64	68	800	14	58	\$179,200	10	\$17,920
N-17A <sup>2</sup>	Residential	68	68	350	12	58	\$67,200	5	\$13,440
N-18 (B)	Residential	69	71						
N-18A <sup>3</sup>	Residential	68	68	450	12	58	\$86,400	5	\$17,280
N-19	Park	64	70	2200 <sup>4</sup>	8	56	\$224,000 <sup>5</sup>	18 <sup>6</sup>	\$12,444
N-20 (A)	Undeveloped	64	70						
N-21 (E)	Residential	60	66						

**Mitigation**

- (A) Mitigation not required.
- (B) Barrier not acoustically effective.
- (C) Barrier not recommended.
- (D) Barrier not cost effective for residence.
- (E) Barrier not acoustically effective due to local streets.

**Notes**

- <sup>1</sup>Recommended barrier height reduces noise levels by 10 dBA
- <sup>2</sup>Homes between Gunner's Branch Road and Chapel Gate Road.
- <sup>3</sup>Homes south of Highpoint Drive
- <sup>4</sup>Length represents barrier on both side of roadway
- <sup>5</sup>Cost reflects a 4-foot barrier on the 400-foot bridge and 8-foot
- <sup>6</sup>Every 125 feet of linear impact to a park equals 1 barrier elsewhere impacted property

**Construction Noise and Impacts**

Construction impacts will include noise, dust, sedimentation, and minor neighborhood and business access disruption. Mitigation through careful construction timing, revegetation, erosion and sediment control, placement of construction staging areas, and implementation of effective maintenance of traffic plans will minimize both short term and long term impacts of this improvement project.



Noise mitigation measures include scheduling of construction operations to minimize interferences with noise sensitive activities, restricting heavy truck access to certain streets and to time of day, and ensuring that all construction equipment has mufflers and other noise reduction devices.

**k. Hazardous Materials**

Soil and water contamination from a former commercial site occur along a portion of the proposed right-of-way under Alternate 3. The 6.19 acre parcel, formerly part of Beahm's Auto Park from the 1950's to 1980's, is located on Great Seneca Extension Stream Valley Park property (on the north side of MD 355) approximately 350 feet west of Great Seneca Creek.

Upon completion of an Initial Site Assessment in the spring 1992, a Phase II Preliminary Site Investigation was conducted to determine the extent of contamination at the site. The report found concentrations of benzene, ethylbenzene and 1,2-dichloroethane, possibly from an underground storage tank (UST) removed in 1973, greatly exceeding U.S. EPA Maximum Contaminant Levels. No contamination was evident downgradient from the monitoring wells.

Results of the hydrogeologic investigation indicate shallow groundwater flows in the direction of Great Seneca Creek. The low potential yields estimated from a pump and treat system at the site, and the low risk to the public and surrounding environment suggest a no remedial action alternative. However, groundwater monitoring may still be required.

**E. SUMMARY OF PUBLIC INVOLVEMENT**

The public was informed about the purpose of this study at both a public hearing and numerous informal meetings with neighborhood representatives during which they were briefed on the range of alternatives and methods of evaluation used for the project.

Comments received at the Combined Location/Design Public Hearing held October 8, 1992 at Martin Luther King, Jr. Intermediate School are found in Sections V and VI of this report. At that meeting, attended by over 150 people, there were 18 commentors, eight of whom preferred Alternate 3, while four preferred the No-Build alternative. Those options that were favored include: the 400 foot high bridge, the east shift, bikeway and sidewalks, and an even number of persons in favor of saving and not saving the 53' tree.

Sections V and VI include verbal and written comments received at and subsequent to the public hearing. The project was also presented to the Montgomery County Planning Board several times and most recently on October 1, 1992.

**MARYLAND ROUTE 355 IMPROVEMENTS  
FROM MD 27 TO MD 124  
CONTRACT NO. M611-101-371**

**FINDING OF NO SIGNIFICANT IMPACT**

**IV. SECTION 4(F) EVALUATION**

**A. INTRODUCTION**

Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 U.S.C. 303 (c)) requires that the proposed use of any land from a significant publicly owned public park or recreation area, wildlife or waterfowl refuge, or from an historic site considered eligible for, or on the National Register of Historic Places, be given particular attention. Final action requiring the taking of such land must document that there are no feasible and prudent alternatives to its use and that the project includes all possible measures to minimize harm to such resources.

**B. DESCRIPTION OF PROPOSED ACTION**

This project involves the reconstruction and widening of MD 355 (Frederick Road) from MD 27 (Ridge Road) south to MD 124 (Montgomery Village Avenue) in Montgomery County, Maryland. A portion of the project area lies between Great Seneca Extension Stream Valley Park and Seneca Creek State Park. Three alternatives were considered: No-Build; Alternate 2 (4/5 lanes); and Alternate 3 (6 lanes). The selected build alternative is Alternate 3 staged construction.

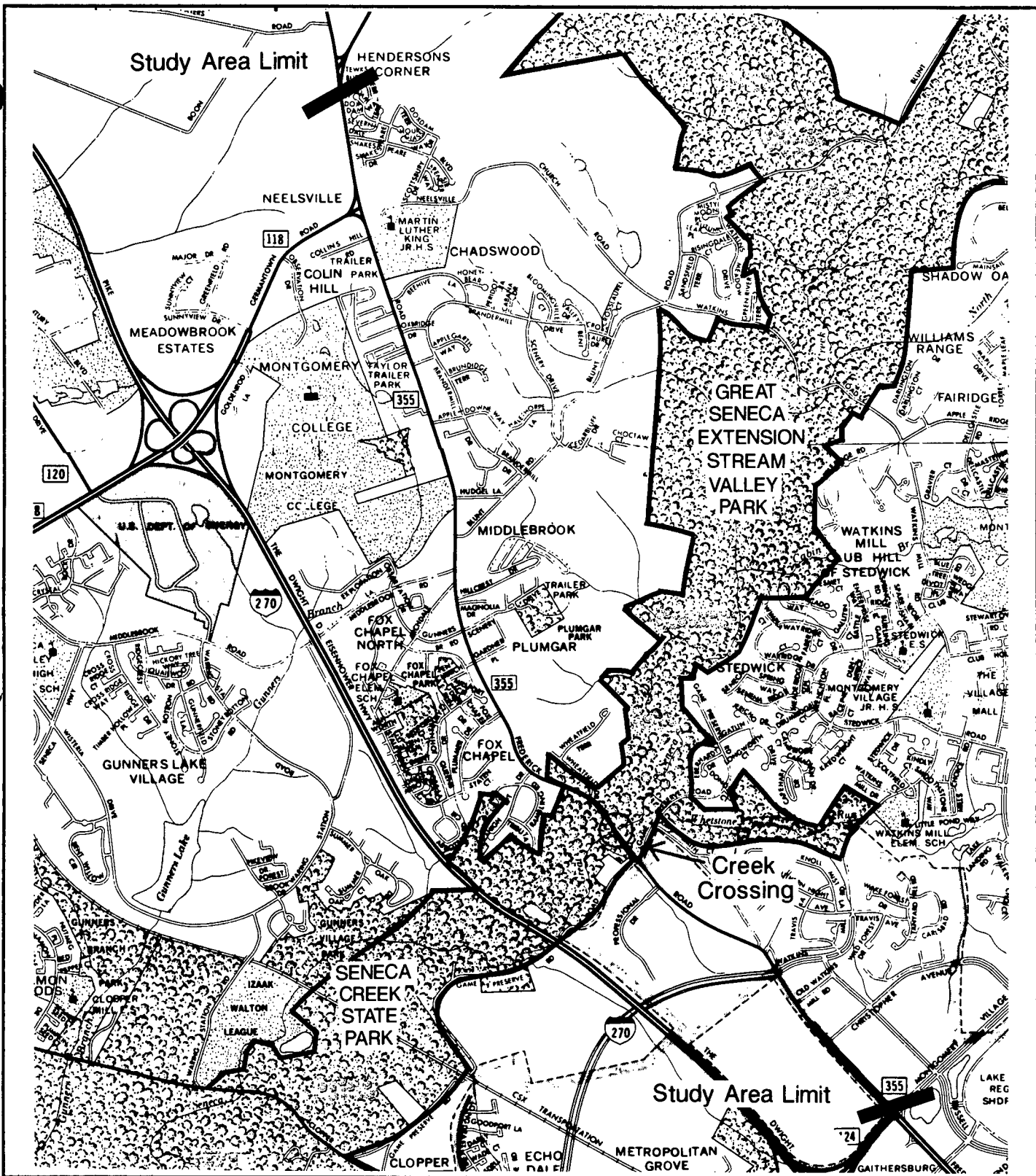
At the time of the Environmental Assessment/Section 4(f) Evaluation which was approved in August 1992, the anticipated build alternatives included a new crossing of Great Seneca Creek which flows through two Section 4(f) resources: Seneca Creek State Park and Great Seneca Extension Stream Valley Park (Figure 21). Several bridge options and mainline alignment shifts for the build alternatives were considered as part of the project planning study for the Great Seneca Creek crossing. These included high and low bridge crossings, the use of the existing bridge and/or new dual bridge structures, and centerline shifts of the mainline either to the east or west of the existing centerline to avoid or minimize right-of-way takes from one or the other of the parks.

The proposed improvements include a new crossing of Great Seneca Creek which flows through two parks (Figure 21). The existing creek crossing consists of a two-lane concrete bridge structure: a 22-foot roadway with no shoulders, contained within 60 feet of right-of-way. The existing structure is approximately 100 feet in length and lies within the 100-year floodplain of Great Seneca Creek. The existing approach roadways along the park property are two lanes with minimal shoulders, contained within a 60-foot right-of-way. Current grade of the approach roadways is 6 percent north of the crossing and 1 percent south of the crossing. There is no vehicular or formal pedestrian access to the parks from MD 355.

Operationally, this portion of MD 355 experiences severe congestion during the morning and evening peak hours of traffic. The intersection of Game Preserve Road, located just south of the bridge crossing currently operates at Level-of-Service (LOS) F during both the A.M. and P.M. peak periods, indicating that volumes are well above capacity. This condition only worsens by the Design Year 2015.

The No-Build alternative would not directly impact or require the acquisition of property from either of the Section 4(f) parklands.

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# Maryland Route 355

MD 27 to MD 124

MARYLAND STATE HIGHWAY ADMINISTRATION

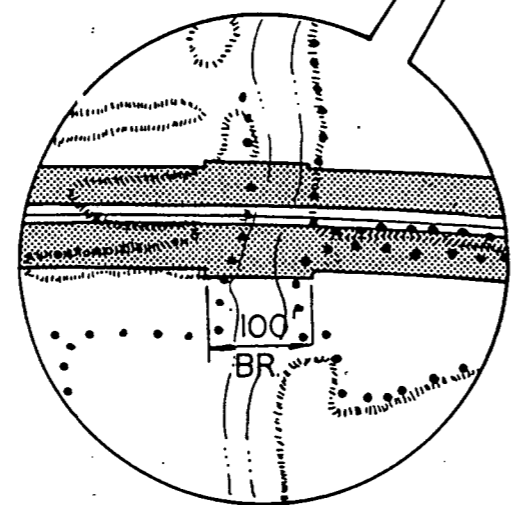
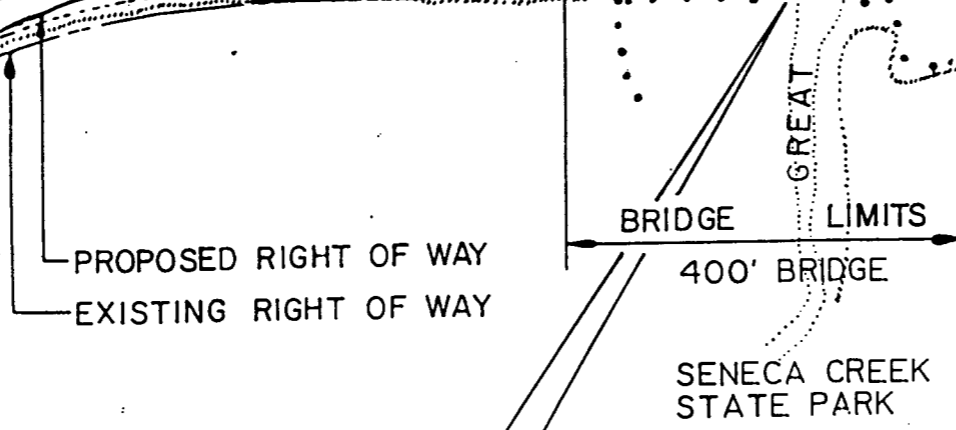
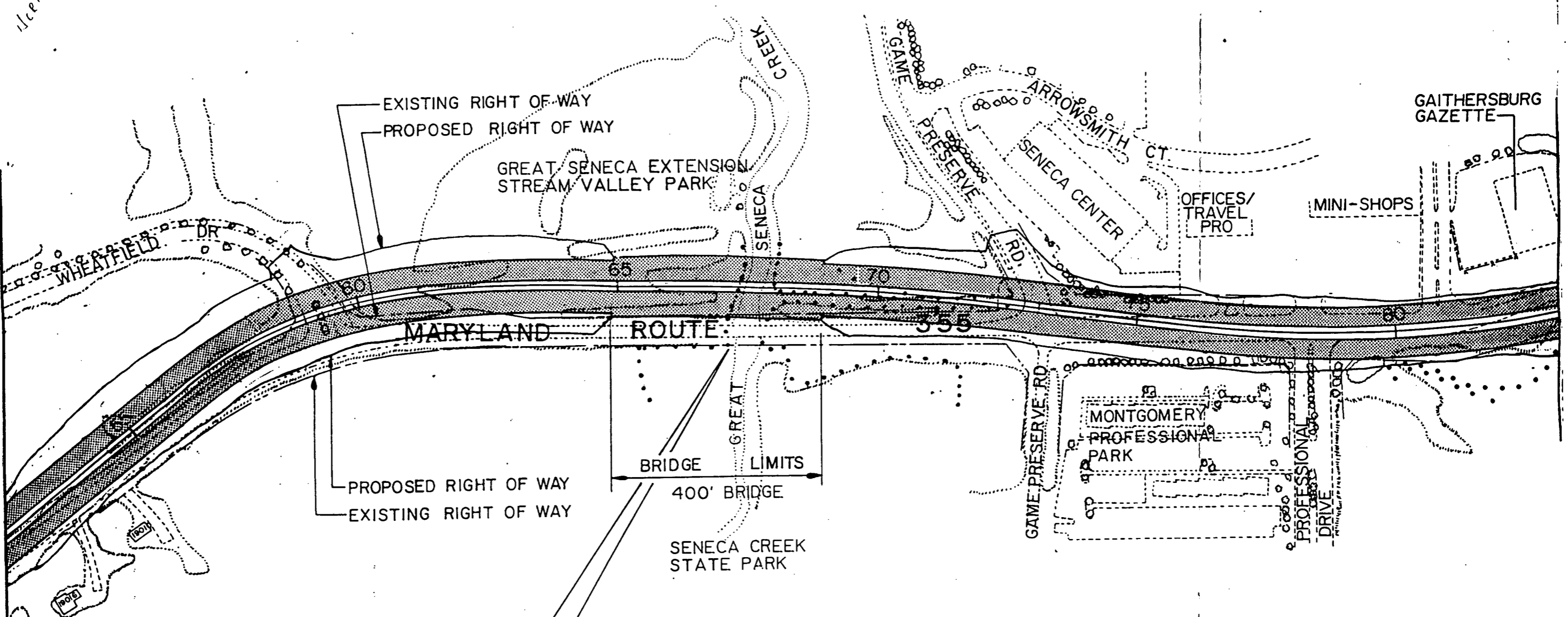
# Affected Section (4f) Parklands

scale 1" = 2000'

Figure 21



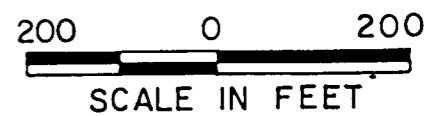
11/2/94



SHORT BRIDGE CROSSING OPTION

LEGEND

- ROADWAY
- WETLAND BOUNDARY
- FOREST BOUNDARY
- EXISTING RIGHT OF WAY
- PROPOSED RIGHT OF WAY



<b>MARYLAND ROUTE 355</b>		
<b>EAST SHIFT</b>		
<b>ALTERNATE 3'</b>		
<b>6 LANE DIVIDED ALTERNATE</b>		
DWG NO	DATE	<b>Figure 22</b>
		SHEET OF

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Alternate 2, with an east shift through Great Seneca Extension Stream Valley Park would affect 4.1 acres of that park, while a west shift would impact approximately the same amount (4.0 acres) of parkland on the west side of MD 355, in Seneca Creek State Park.

Alternate 3, with a west shift, would affect 4.4 acres of Seneca Creek State Park and avoid Great Seneca Extension Stream Valley Park. The selected build alternative, *Alternate 3 staged construction*, includes an eastern shift with a 320-foot bridge over Great Seneca Creek, affecting approximately 4.7 acres of Great Seneca Extension Stream Valley Park while avoiding impacts to Seneca Creek State Park.

**C. DESCRIPTION OF 4(F) RESOURCES**

**Seneca Creek State Park**

Seneca Creek State Park, which follows Great Seneca Creek west of the MD 355 crossing, is owned by the State of Maryland, and is administered by the Maryland Department of Natural Resources, Greenways and Resource Planning (Figure 20). Great Seneca Creek has its origin northeast of the study corridor near MD 108 and flows in a southwest direction. Funds from the U.S. Department of the Interior's Land and Water Conservation Fund and the Maryland Open Space Program were used to purchase portions of this public parkland.

The park, extending west from MD 355 along the western edge of the roadway to the Potomac River, is comprised of 5800 acres and includes a 90 acre lake, Lake Clopper, located approximately 2 miles southwest of the MD 355 crossing. Recreational facilities include hiking trails, boating facilities and picnic areas. Current use of the park in the vicinity of the MD 355 crossing is passive and there are no formal recreational facilities, including vehicular and pedestrian access or parking for the park along MD 355. No new recreational facilities are planned that will affect the MD 355 right-of-way.

**Great Seneca Extension Stream Valley Park**

Great Seneca Extension Stream Valley Park, located east (upstream) alongside the MD 355 crossing of Great Seneca Creek, is comprised of 1,430 acres. The park boundaries are situated on both sides of Great Seneca Creek and the park is considered a stream valley/conservation park. The park property is owned by Montgomery County and was purchased with Montgomery County general obligation bonds. It is managed by the Maryland-National Capital Park and Planning Commission (M-NCPPC), Montgomery County Department of Parks. No federal or state grant monies were used to acquire any park property or facilities.

The intended use of the stream valley park is passive recreation including hiking, bicycling, nature study, horseback riding and fishing. The park is presently undeveloped in keeping with its intended conservation purpose. Public use primarily comes from adjoining residential subdivisions whose residents are within walking distance of the park. Park visitation is not recorded by M-NCPPC. There are no parking facilities for park users who may come to the area by motor vehicle, and none are planned.

**D. DESCRIPTION OF IMPACTS**

This section discusses impacts to Great Seneca Creek Extension Stream Valley Park, it being the Section 4(f) resource affected by the selected build alternative.

**Alternates Considered and Dropped**

**Alternate 1 (No-Build)**

The No-Build Alternate will not require right-of-way from Great Seneca Extension Stream Valley Park on the east side of MD 355. The roadway through this section will, however, experience increased traffic congestion and possibly, increased traffic accidents, given existing sight distance problems and deficient roadway design.

**Alternate 2: Four-Five Lanes**

Two options for Alternate 2 were assessed for parkland impacts; 1) retention of the existing bridge plus the construction of a new low bridge (100-foot length) immediately east of the existing bridge; and 2) the construction of a new high dual bridge (400-foot length) to accommodate the four lanes. Table 12 summarizes the parkland impacts.

**Effects on Parkland Right-of-Way and Natural Resources**

Alternate 2, low bridge option, will require approximately 2.3 acres of right-of-way from Great Seneca Extension Stream Valley Park (east of MD 355) with the use of cut/fill slopes (see Table 12). This bridge option requires approximately 1.2 acres of right-of-way with the use of retaining walls. The low bridge option will fill approximately 2.7 acres (with cut/fill slopes) and 2.2 acres (with retaining walls) of the Great Seneca Creek floodplain along both sides of MD 355.

The high bridge option affects approximately the same amount of right-of-way, 2.3 acres, within Great Seneca Extension Stream Valley Park. Total impact to the parkland under this option with retaining walls is approximately 1.2 acres. The high bridge has similar right-of-way impacts because its longer span reduces the length needed for bridge embankments, however, this is offset by the greater width needed for bridge embankments. Side slopes are calculated using a 2:1 ratio. Under the right soil conditions and with certain slope treatments, the side slopes could be made steeper in order to reduce impacts.

Both the 100-foot and 400-foot bridge under Alternate 2 would provide vertical clearance (approximately ±8 feet) underneath the bridge to accommodate pedestrian and bicycle access and serve as a wildlife corridor. At present, passage under the bridge is not possible and park users are forced to cross the roadway at grade. Floodplain fill for the high bridge option will be less, totalling approximately 2.1 acres with cut/fill slopes and 1.4 acres with retaining walls (see Table 12).

Wetland encroachment is approximately 0.7 acres using cut/fill slopes for the low bridge option; these affected wetlands are located within the Great Seneca Extension Stream Valley Park. Wetland encroachment for the high bridge option is approximately 0.6 acres with cut/fill slopes. The affected wetlands perform the function of long term and short term sediment trapping, long term nutrient

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retention and removal, and habitat for aquatic wildlife and fisheries. While cut/fill slopes affect a total of 0.6 and 0.7 acres of wetlands under high and low bridge options, retaining walls affect a negligible amount of wetlands in the park, 0.5 acres.

Parkland was also assessed for noise impact associated with the project. Under both build alternatives, an approximate 50-foot strip, along the edge of the park, running parallel to MD 355 will be impacted by traffic noise levels exceeding 67 dBA. An insignificant difference in noise levels between Alternate 2 and Alternate 3 is seen. Compared to the No-Build with a predicted traffic noise level of 66 dBA in the design year (2015) the build alternative noise levels are predicted at 70 dBA in the design year. The noise levels for the 100-foot and 400-foot bridge options for both alternatives are also nearly identical.

Noise impacts at Great Seneca Extension Stream Valley Park (N-19) due to the proposed roadway could be effectively mitigated with two 1,100-foot-long barriers, one on the northbound side and one on the southbound side of the proposed roadway. A four-foot-high structural barrier is recommended on both sides of the 400-foot bridge span along with eight-foot-high barriers for the rest of the length of the park. The total cost of all barriers at the park is \$224,000. Since every 125 feet of linear impact to a park is considered one impacted property, the two barriers are cost effective at \$12,000 per impacted property protected. Both barriers would have been studied further during design, however, due to the passive nature of the park, the environmental agencies requested that noise barriers not be used at this location.

Construction activities in the park will result in noise impacts to areas immediately adjacent to the construction site. Noise impacts are generally greatest during the clearing and site preparation phases. Noise levels from heavy earth-moving equipment are typically 80 to 90 dBA at a distance of 50 feet. Noise mitigation measures that will be considered include the scheduling of construction operations to minimize interference with noise sensitive activities, restricting heavy truck access to certain streets and to time of day of operations, and ensuring that all construction equipment has mufflers and other appropriate noise reduction devices. Application of these measures will substantially reduce expected impacts.

There are no long-term air quality impacts on parkland associated with Alternate 2. However, the construction phase of the project has the potential for temporarily increasing the amount of fugitive dust in the immediate vicinity. Appropriate procedures are outlined in the *Standard Specifications for Construction and Materials* established by the State Highway Administration and will be followed to minimize impact. These procedures have been found to be consistent with Code of Maryland Regulations (COMAR) 26.11.06.03 (Regulations Governing the Control of Air Pollution in the State of Maryland) by the Maryland Air Management Administration and have proven effective in minimizing adverse air quality impacts during this type of construction. These same noise and air conditions exist under Alternate 3, as discussed below.

**Alternate 3: Six Lanes Staged Construction (Selected Alternative)**

The selected build alternative, Alternate 3 staged construction, includes widening of MD 355 into Great Seneca Extension Stream Valley Park with a high bridge option and an east shift (see **Description of Selected Build Alternative** on page II-1 and Figure 22). The 320-foot bridge provides adequate vertical clearance (approximately 13.5 feet) underneath the bridge to accommodate pedestrian, equestrian and bicycle access and serves as a wildlife corridor. The MD DNR Greenways and Resource Planning is



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interested in developing a future trail along Great Seneca Creek to connect the Seneca Creek State parkland on the west of MD 355 with the Great Seneca Extension Stream Valley Park. At present, passage under the bridge is not possible and park users are forced to cross the roadway at grade. However, no formal plans to construct the trail are being advanced at this time.

Based on the estimated impacts and current uses of the affected 4(f) resource, Alternate 3 staged construction does not adversely affect the function of the park. Passive recreation will actually be improved with the bridge clearance that allows equestrian and pedestrian passage under the bridge.

**Effects on Parkland Right-of-Way and Natural Resources**

Alternate 3, with a high bridge east shift requires approximately 4.7 acres of right-of-way with cut/fill slope from Great Seneca Extension Stream Valley Park (see Table 12 below and Figure 21). The use of retaining walls would not save any additional parkland over that impacted with the use of cut/fill slopes. As previously noted, they have been dropped from consideration.

**TABLE 12  
EFFECTS OF BUILD ALTERNATIVES ON  
GREAT SENECA EXTENSION STREAM VALLEY PARK**

	Encroachment Into Park (Ac)	Encroachment Into wetlands (Ac)	Area of Fill In Floodplain
<b>Alternate 2</b>			
<b><u>4 Lanes, 100' Bridge</u></b>			
Cut/fill slopes	2.30	0.71	2.74
Retaining walls	1.23	.50	2.19
<b><u>4 Lanes, 400' Bridge</u></b>			
Cut/fill slopes	2.31	0.63	2.08
Retaining walls	1.13	0.46	1.44
<b>Alternate 3 west shift</b>			
<b><u>6 Lanes, 320' Bridge</u></b>			
Cut/fill slopes	4.38	2.02	2.56
Retaining walls	n/a	1.80	2.20
<b>Alternate 3 staged construction east shift</b>			
<b><u>6 Lanes, 320' Bridge</u></b>			
Cut/fill slopes	4.66	0.76	2.00

**Notes:**

- A. Effects are based on alignments and cut/fill limits (plus 10 feet) generated between 8/28 and 9/3. All roadside grading widths are 12 feet.
- B. Wetland limits are based on the 8/91 field survey and field confirmation in 12/91. Wetland area effects include water surfaces and areas under bridges.
- C. The park limits are based on the tax map property lines. General park limits were identified using plans from M-NCPPC and Germantown Master Plans.

Effects on the natural resources within the park include the filling of approximately 2.0 acres of the Great Seneca Creek floodplain which extends along both sides of MD 355. Wetland encroachment is approximately 0.8 acres within the Great Seneca Extension Stream Valley Park (east of MD 355). These wetlands function as long and short term sediment trapping, long term nutrient retention and removal and habitat for aquatic wildlife and fisheries.

Noise impacts at Great Seneca Extension Stream Valley Park (N-19) due to the proposed improvements could be effectively mitigated with two 1100-foot-long barriers, one on the northbound side and one on the southbound side of the proposed roadway. A four-foot-high structural barrier was recommended on both sides of the 320-foot bridge span along with eight-foot-high barriers for the rest of the length of the park. The total cost of all barriers at the park is \$224,000. Since every 125 feet of linear impact to the park is considered one impacted property, the two barriers are cost effective at \$12,000 per impacted property protected. However, the environmental agencies have recommended during coordination efforts with SHA that noise walls not be used due to the high public cost and passive use of the park. Therefore, these barriers will not be studied further during design.

Construction activities in the parklands will result in noise impacts to areas immediately adjacent to the construction site. Noise impacts are generally greatest during the clearing and site preparation phases. Noise levels from heavy earth-moving equipment are typically 80 to 90 dBA at a distance of 50 feet. Noise mitigation measures to be considered include the scheduling of construction operations to minimize interferences with noise sensitive activities, restricting heavy truck access to certain streets and to time of day of operations, and ensuring that all construction equipment has mufflers and other appropriate noise reduction devices. Application of these measures will substantially reduce expected impacts.

There are no long-term air quality impacts on parkland associated with the selected build alternative. However, the construction phase of the proposed project has the potential for temporarily increasing the amount of fugitive dust in the immediate vicinity. Appropriate procedures are outlined in the *Standard Specifications for Construction and Materials* established by the State Highway Administration and will be followed to minimize impact. These procedures have been found to be consistent with Code of Maryland Regulations (COMAR) 26.11.06.03 (Regulations Governing the Control of Air Pollution in the State of Maryland) by the Maryland Air Management Administration and have proven effective in minimizing adverse air quality impacts during this type of construction.

#### **E. AVOIDANCE ALTERNATES**

Alternate 1 (No-Build) is a park avoidance alternate and does not require right-of-way from either Great Seneca Extension Stream Valley Park on the east or the Seneca Creek State Park on the west. However, the No-Build alternative will not provide improved traffic capacity and safety. This will result in increased traffic congestion and possibly more traffic accidents, given existing sight distance problems and deficient roadway design. Alternate 1, therefore, is not a feasible and prudent alternative because it fails to provide the needed traffic capacity in the design year (2015).

Seneca Creek State Park and Great Seneca Extension Stream Valley Park are linear stream valley parks, which extend six miles to the southwest and three miles to the northeast, respectively, from the MD 355 study corridor. A shift, therefore, in the alignment of MD 355 which runs between the two parks, will not entirely avoid the taking of park property. A shift in either direction will avoid one of the parks, but not the other.

For Alternate 3, two options were developed to determine if parkland property and natural resource impacts can be avoided or minimized: 1) an alignment shift to the east into Great Seneca Extension Stream Valley Park, using high and low bridge options; and 2) an alignment shift to the west into Seneca Creek State Park, using high and low bridge options.

Shifting the horizontal alignment to the west was evaluated for any benefits. This option affected approximately 4.4 acres of Seneca Creek State Park and no right-of-way from the Great Seneca Extension Stream Valley Park (see Table 12). Approximately 2.6 acres (with cut/fill slopes) of fill will be placed in the floodplain within the Seneca Creek State Park. Wetland encroachment totals slightly more than 2.0 acres of which most are located within the Seneca Creek State Park. Retaining walls will have a negligible impact: 2.2 acres of floodplain and 1.8 acres of wetlands encroachment. The same wetlands are affected by either the east or west shifts and the straight alignment.

The shift would result in a straighter alignment which is beneficial, however the shift would also result in two additional residential takes and an undesirable skewed bridge crossing over Great Seneca Creek. The vertical alignment would also be affected by the shift and would require either a cut into the hillside or several undesirable vertical curves along the roadway just north of the bridge crossing.

**Comparative Analysis of Parkland Impacts**

Based on a comparative analysis of the east and west shift options and the straight alignment, there are no substantial differences regarding the total acreage of parkland and natural resources impacted (see Table 13). There are, however, differences between which parklands, floodplains and wetlands will be affected depending on the alignment shift, and between the two build alternatives. For example, the Alternate 3, east shift through Great Seneca Extension Stream Valley Park will require the most parkland acreage but encroach less on the wetlands and floodplain of Great Seneca Creek than the Alternate 3 west shift through Seneca Creek State Park. The value and quality of the wooded wetlands on the west side of MD 355 occupying the more intact floodplain forest, are of greater quality and functional value than the wetlands on the east side of MD 355 and therefore are more important to protect. Further, a shift to the west would require the displacement of two residences to avoid less parkland. Therefore, the overall impact of Alternate 3, east shift, which requires more parkland right-of-way, is less than Alternate 2 which requires less parkland right-of-way but has greater socioeconomic and natural resource impacts.

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**TABLE 13  
EFFECTS OF ALIGNMENT SHIFT OPTIONS ON SECTION 4(F)  
PARKLANDS AT GREAT SENECA CREEK CROSSING**

Alternate	Encroachment into Parks (Ac)			Encroachment into Wetlands (Ac)			Area of Fill In Floodplain (Ac)
	East <sup>1</sup>	West <sup>2</sup>	Total	East	West	Total	
<b>*4 Lanes, east shift</b> (400' Long High Bridge) Sta 64+90 - 68+90 With Cut/Fill Slopes	4.11	--	4.11	0.68	0.53	1.21	1.52
<b>*4 Lanes, west shift</b> (400' Long High Bridge) Sta 64+90 - 68+90 With Cut/Fill Slopes	--	4.04	4.04	--	1.66	1.66	2.22
<b>6 Lanes, east shift</b> (320' Long High Bridge) Sta 64+90 - 68+90 With Cut/Fill Slopes	4.66	--	4.66	0.76	0.65	1.34	2.00
<b>6 Lanes, west shift</b> (400' Long High Bridge) Sta 64+90 - 68+90 With Cut/Fill Slopes	--	4.38	4.38	0.04	1.98	2.02	2.56

<sup>1</sup>Parkland east of MD 355 is within the Great Seneca Extension Stream Valley Park.

<sup>2</sup>Parkland west of MD 355 is within the Seneca Creek State Park.

\*Retaining walls not calculated.

**Notes:**

- A. Effects are based on alignments and cut/fill limits (plus 10 feet) generated between 8/28 and 9/3. All roadside grading widths are 12 feet.
- B. Wetland limits are based on the 8/91 field survey and field confirmation in 12/91. Wetland area effects include water surfaces and areas under bridges.
- C. Low bridge options for 4- and 6-lane alternates through east and west parks will have negligible differences in impacts (as compared to high bridge options).

**F. MEASURES TO MINIMIZE HARM**

The use of retaining walls was investigated at critical locations to minimize parkland impacts (see Table 12). For a number of reasons including cost ineffectiveness, adverse visual impact, and minimal reduction in parkland impacts, retaining walls are no longer being considered. DNR staff attended an SHA parks meeting on 12/16/91 where they stated that retaining walls would be aesthetically displeasing although landscaping could be used to offset the visual disturbance. The implementation of a reduced typical section through the parks would compromise safety and is therefore not being considered.

Other measures explored to minimize affects to parkland include:

- Widen MD 355 on the east side to avoid the taking of Seneca Creek State Park land; and in so doing, avoid or minimize the loss of wetlands on the west side occupying the more intact floodplain forest which are of greater quality than the wetlands on the east side primarily occupying a riprap channel;

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- Utilize construction techniques and engineering design criteria to minimize disturbance of the wooded wetlands on the south side of Great Seneca Creek and the creek itself;
  - Utilize design and construction techniques to minimize erosion, sedimentation or other disturbance of the creek, given that Great Seneca Creek provides unusually good habitat for fish;
  - Use of 2:1 cut slopes to minimize the amount of right-of-way;
  - Use of curb and gutter to reduce cross section and thus minimize right-of-way;
  - Use of 40 mph design speed instead of 50 mph design speed and thus minimize right-of-way and;
  - Eliminate the hiker/biker trail while maintaining a five-foot sidewalk through the park to minimize right-of-way.

Most of these mitigation measures will be undertaken during final design and construction based on additional engineering studies and the hydraulic and hydrologic analyses.

#### **G. MEASURES TO MITIGATE IMPACTS**

In consultation with the Maryland DNR and the M-NCPPC, the following mitigation measures have been developed for the Great Seneca Creek crossing and will be considered during final design for Alternate 3 staged construction:

- Utilize existing right-of-way as much as practicable to minimize park property takes.
- Bridge construction/location precludes need to realign/modify Great Seneca Creek.
- Construction sequencing precludes need for temporary widening (disturbance) to maintain traffic.
- Develop conceptual studies of stormwater management and mitigation needs early in the final design of Alternate 3 so impacts on the park and the park's natural resources are considered as part of the total project;
- Provide approximately 13'.5" clearance under the bridge to provide for possible equestrian trail in the future;
- Provide approximately 200' wide area at bridge crossing to accommodate a wildlife passage;
- Bridge design allows for pedestrian use with a sidewalk on one side of the bridge;
- Roadway design allows for wide outside lanes to accommodate bicyclists and;
- Continue coordination with DNR and M-NCPPC concerning project design through park property.

## H. COORDINATION

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Coordination with the DNR and M-NCPPC regarding possible impacts to Seneca Creek State Park and Great Seneca Extension Stream Valley Park respectively, has been ongoing throughout the planning process. In the initial stages of planning, both DNR and M-NCPPC recognized the need to acquire land for this project, however, M-NCPPC has agreed to accept fee simple payment for the affected parkland property at Great Seneca Extension Stream Valley Park (see M-NCPPC letter dated 4/20/93 on page VI-110).

January 20, 1993 - Interagency Meeting

SHA discussed the results of its recent Hydraulic and Hydrologic study regarding the Great Seneca Creek crossing. The investigation yielded a 320-foot-long bridge which provides a 13' .5" clearance and approximately 200 feet of width. There is approximately 0.10 feet of back water increase with this size structure. It was pointed out that wetlands in the area of the crossing include a riprap side ditch. The agencies present concurred with the selected 320 foot bridge with the option to modify the size if necessary.

April 21, 1993 - Interagency Meeting

SHA reported that the preliminary site investigation of the hazardous waste study for the site on the east side of MD 355 on M-NCPPC property was complete and SHA had sent the findings to the Maryland Department of Environment. SHA Soils and Foundation were to continue investigation and consider a gas survey. SHA reported that the Administrator had selected Alternate 3 (a six-lane facility from MD 27 to MD 124). It would be a staged construction. The Administrator also agreed to the 320-foot bridge length as discussed at the last Interagency Meeting. Pending the hazardous waste study findings, SHA reported that it would be preferred to go with an east park shift. The 53-inch (diameter) oak tree will be affected by the project as any shift to avoid the tree would affect approximately 7 to 10 residences.

SHA requested agency agreement to proceed getting concurrence on the selected alternate and to bypass purpose and need concurrence. The agencies agreed to this.

SHA would like to drop the east side as a mitigation site and proceed with the Hawkins property. US Fish and Wildlife Service wants some restoration done on the Wetland 3, downstream from the project site. SHA has not ruled that out, but mitigation for that site has not yet been developed. U.S. FWLS suggested that SHA discuss the matter with DNR's Non-Tidal Wetlands division.

December 2, 1992 - Pre-recommendation Meeting

Specific details of the project were discussed at this meeting, including the 53-inch (diameter) oak tree shift, park shift alignments and hazardous waste, typical sections and bridge size. Other minor amenities are specified in the meeting minutes in Section V. Final recommendations of the December meeting were:

- The tree avoidance option displaces up to 10 residences and was therefore not recommended.
- The east shift is the preferred alignment.

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- A potential hazardous waste site was identified in the east alignment. The site is undergoing further investigation.
  - The selected typical section is a six-lane divided staged construction; its limits are between Watkins Mill Road and Middlebrook Road.
  - The bridge structure will be 320 feet long and have a 13'.5" foot clearance.
  - Retaining walls were investigated and none are recommended in the parks due to the passive nature of these areas and the cost.

February 4, 1993 - Pre-recommendation Meeting

The February meeting specified a typical section to include a hiker/biker trail and sidewalk. It also highlighted the source of hazardous waste on the east side of Great Seneca Creek that may need to be cleaned up. The meeting concluded that the east shift through the vicinity of the creek can go forward with lab analysis of the hazardous material to be completed prior to the final Recommendation meeting.

April 19, 1991 - DNR letter to SHA

This letter confirms that the two parcels adjacent to MD 355 which are part of Seneca Creek State Park were acquired with money provided by the U.S. Department of the Interior through the Land and Water Conservation Fund, and Maryland State Program Open Space Funds. As required by the Land and Water Conservation Fund Act, parkland, acquired with Section 6(f) funds and used in a proposed action, must be replaced by land of equivalent fair market and of equivalent usefulness and location.

Maryland SHA, DNR and M-NCPPC met to discuss parkland impacts associated with the MD 355 widening. In addition, the U.S. Fish and Wildlife Service (U.S. FWLS) and the U.S. Army Corps of Engineers (ACOE) have been involved in discussions concerning the natural resources located on park property that would be affected by the proposed action. Key points discussed at these coordination meetings are as follows:

May 15, 1991 - SHA Interagency Review Meeting for the MD 355 Project

- DNR wanted to address the option of studying an intermediate bridge length between 100 feet and 1200 feet.
- DNR wanted the project to maximize wetland impact avoidance in the crossing and parkland areas. Further, DNR wanted to see interplay of natural resources between east and west side of crossing maximized.
- DNR requested that the integrity of existing bridge be evaluated to see if it is cost effective to build a new structure with greater span length and higher elevation.
- DNR stated that the parkland along the west side of MD 355 at the Great Seneca Creek crossing, Seneca Creek State Park, was purchased in part by the state's Program Open Space and federal Land and Water Conservation funds.
- DNR requested continued involvement in future discussions of the bridge crossing.

November 15, 1991 - SHA-Sponsored Agency Field Review to Delineate Wetlands Affected by the Project.

- U.S. FWLS would like to see a longer, higher bridge across the Great Seneca Creek within the parklands, to provide better wildlife clearance.
- Wetland delineation in the parklands was modified by consensus of the DNR, COE, USFWS.
- The potential location for a wetland replacement site along the east side of MD 355 within the Great Seneca Extension Stream Valley Park boundary was identified for further investigation. A portion of this site is also under study as a potential hazardous waste site from a former auto wrecking shop. Results of a site assessment will be necessary to assess compatibility as a wetland mitigation site.

December 16, 1991 - SHA-sponsored agency meeting to discuss parkland impacts along Great Seneca Creek crossing.

- USFWS wanted to establish a wildlife corridor under the bridge at a minimum length of 150 feet; and to study both 200- and 400-foot bridge options.
- DNR felt that retaining walls would not be aesthetically pleasing and suggested that landscaping be used to mitigate disturbance.
- DNR stated that additional coordination would be required if impacts occur to the state-owned park because some of the parcels were acquired with federal funds and would require Department of the Interior review.
- DNR suggested that the height of the bridge include equestrian clearance, if bridge height increase is necessitated by the hydraulic and hydrologic study to be conducted for the project.
- DNR will evaluate the alternatives based on mitigation. Requested a field review meeting to consider other environmental impacts associated with the project.
- M-NCPPC stated that even though Great Seneca Creek is a Class I stream they want to consider it high quality.

February 12, 1992 - SHA-sponsored agency field review of parkland impacts along Great Seneca Creek.

- DNR indicated that an intermediate bridge length between 100 and 400 feet may be acceptable; and that a vertical clearance of 12 feet beneath the bridge is desired for wildlife, pedestrian and equestrian passage between both parks.
- DNR also advised coordinating any utility relocations early to avoid delays in right-of-way entry agreements.
- M-NCPPC would like to keep as close to the existing right-of-way as possible to maximize its reuse and minimize park effects. M-NCPPC would require replacement of any parkland with equal or comparable land. Hydraulic information of flows through the riprap channel on the east side of MD 355 is also requested.
- DNR and M-NCPPC stated their general consensus that an alignment shift east along MD 355 which avoids Seneca Creek State parkland and natural resources but requires parklands and impacts wetlands within the Great Seneca Extension Stream Valley Park is preferred over a western shift or a straight alignment that requires both east and west park right-of-way and wetland loss on both sides of MD 355.



February 21, 1992 - Letter from DNR, Water Resources Administration, Non-tidal Wetlands Division, summarizing the Non-tidal Wetlands Division's comments, following the February 12, 1991 field review meeting:

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- Widening the road to the west, and/or widening the road along both sides of the creek would impact wetlands with the highest functional value. The wetland channel on the east side of the road has been disturbed by heavy riprap and sedimentation, and the overall functional values of the wetlands on the east are lower than those on the west. Also, the area of potential jurisdictional wetland loss is less on the east side.
- If the road widening can be done on the east side of the road as preferred, WRA - Non-tidal Wetlands Division will specifically request efforts to minimize impacts to the wooded wetlands further to the north in order to protect beneficial water quality functions. Portions of the riprap channel may not be jurisdictional under State Non-tidal Wetlands Regulations.
- WRA - Non-tidal Wetlands Division agrees that a retaining wall on the west side may not be feasible and effective if the road is widened on the west side.

February 24, 1992 - Letter from DNR commenting on the conclusions of the February 12, 1992 field review.

- DNR recommends that SHA eliminate from consideration those alternates that would widen the road on the west side, into Seneca Creek State Park. An eastern shift would not require the approval of the DOI; it would not require the removal of occupied residences in the immediate vicinity; the wetlands along the eastern side are of lesser functional value than those on the west side.
- DNR requests that every effort to minimize impacts to public parkland, non-tidal wetlands and floodplains be considered for the selected alternative.

April 3, 1992 - Letter from the M-NCPPC commenting on the general consensus reached at the February 12, 1992 agency field meeting that the east shift at the crossing of Great Seneca Creek was preferred.

- M-NCPPC concurs that the least environmentally damaging alternative would be to widen to the east side.
- M-NCPPC stated their approval of the conceptual design of the east alignment shift and provided the following recommendations:
  - Minimize the amount of right-of-way required;
  - Minimize disturbance of the wooded wetlands south of the stream;
  - Minimize sedimentation and other stream disturbances during bridge and approach road construction to minimize impacts to water quality and fish habitat in Great Seneca Creek;
  - Coordinate with M-NCPPC regarding stormwater management;
  - Continue to involve M-NCPPC in the design process of the selected alternative.

## **I. CONCLUDING STATEMENT**

Based upon the above considerations, it is determined that there is no feasible and prudent alternative to the use of land from Great Seneca Extension Stream Valley Park and that the proposed action includes all possible planning to minimize harm to Great Seneca Extension Stream Valley Park resulting from such use.

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**MARYLAND ROUTE 355 IMPROVEMENTS  
FROM MD 27 TO MD 124  
CONTRACT NO. M611-101-371**

**FINDING OF NO SIGNIFICANT IMPACT**

**V. PUBLIC HEARING COMMENTS**

**A. COMBINED LOCATION/DESIGN PUBLIC HEARING**

A combined Location/Design Public Hearing for proposed MD 355 capacity expansion was held on Thursday, October 8, 1992 at Martin Luther King, Jr. Intermediate School in Germantown, Maryland. The purpose of the hearing was to present the results of the engineering and environmental studies, and to receive public comments on the project.

**B. PUBLIC HEARING COMMENTS**

A total of 18 people testified at the public hearing. A summary of the responses is as follows:

- Ten people testified that they wanted to see MD 355 widened.
- Eight people testified in favor of Alternate 3.
- Five people testified that they hope there will be noise abatement in various locations throughout the study area.
- Four people are against improving MD 355
- Three people testified that they hoped to see the 53-inch (diameter) oak tree spared.
- Three people testified in favor of sidewalks and/or bikeways being incorporated into the road plans.

**1. Delegate Gene Counihan, Maryland State Legislator**

Comment/Question: Delegate Counihan felt that there has been much anticipation about this project and people are anxious that it get underway. "I believe you're going to hear overwhelming support for the six-lane Alternate 3. We have expectations about it being a safe road that will handle the (projected) volume of traffic. We also have considerable expectation that it be environmentally sound. I want to be perfectly clear in my support for Alternate 3." He does not believe that Alternative 2 will meet the future needs of the area. He stressed the importance that, during the two or three years of construction, traffic continue to move through the area in a safe and efficient manner so that at no period of time will the road be completely closed to through traffic. He also stated that local businesses need to be fully accessible to their customers during construction.

SHA Response: When SHA develops its maintenance of traffic plans, all of the concerns raised by Delegate Counihan will be given consideration - maintaining the lanes, keeping traffic open during the peak hours, and maintaining daily access to the businesses.

**2. Mr. Jay Persensky, Gaithersburg City Councilman**

Comment/Question: "The City of Gaithersburg wishes to go on the record as being opposed to the planned reconstruction of MD 355, due to the uncertain status of companion road projects. Of particular concern to the city is the questionable status of M-83, as well as the significant delay experience over the timing of Watkins Mill Road Extended." He suggested that SHA coordinate these projects to interface with the MD 355 project. Once the construction of these projects has been assured, Councilman

Persensky said that the city would support Alternate 3. "We should like to conduct a more detailed review of the environmental assessment and further evaluate the operational aspects . . . of Alternate 3." 76

**SHA Response:** Both M-83 and Watkins Mill Road Extended are county road projects and SHA is not able to delay work on MD 355 in spite of delays with these other projects. There is a present need for greater capacity on MD 355 and SHA is proceeding with the roadway improvement project. It should be noted that all roadway projects, both state and local, are coordinated through the Montgomery County Department of Transportation.

This Finding of No Significant Impact document (FONSI) includes a detailed environmental assessment of Alternate 3; see Section II.

**3. Ms. Patricia Willard, Maryland-National Capital Park and Planning Commission**

**Comment/Question:** Ms. Willard explained that the M-NCPPC Planning Board endorses the project with certain conditions, which are submitted in written testimony. "The Board finds Alternate 3 to be consistent with the Master Plan recommendations. We want a Class I bike path on the west side of the road for the length of the project. We support the 400-foot bridge across Great Seneca Creek and . . . are pleased that the Cider Barrel has been avoided in this design." M-NCPPC also wants to coordinate with SHA on the park issues. She requested, on behalf of the Board, that streetscape elements to be identified in the Germantown Streetscape Plan be provided as part of this project. The remaining Board comments are found in the written testimony.

**SHA Response:** Design of Alternate 3 allows for a bicycle/pedestrian trail. An eight-foot hiker/biker trail will be provided on the west side of MD 355. In addition, a five-foot sidewalk will be built on the east side of the roadway except at the bridge crossing where a structure of minimal width is planned.

Improvements to MD 355 will have no direct impact on the Cider Barrel which falls within the developer's portion of the roadway.

The SHA has come to an agreement with M-NCPPC for fee-simple purchase of affected portions of Great Seneca Creek Stream Valley Park (see M-NCPPC letter dated 4/20/93 on VI-110).

The Germantown Streetscape Plan is a county administered document and therefore comes under county jurisdiction. A hiker/biker trail will be included as part of the design for the selected build alternative.

**4. Ms. June Bogan, Brandermill Homeowners Association**

**Comment/Question:** Ms. Bogan thanked both the SHA and RK&K (developers of the north segment of the project) for including the Brandermill Community in the project's planning stages. She mentioned the disputed berm in front of Brandermill on MD 355 which will be removed under the widening. Despite substantial impacts of the project on several Brandermill residents, the community is aware that MD 355 needs to be widened. "We would probably suggest the five-lane alternative because it has the least impacts. She reiterated Brandermill's satisfaction with the proposed sound barrier and landscaping that RK&K and the developers proposed. She also wanted assurance by SHA "that they will work with Brandermill to make construction inconveniences as few as possible and that the issue of a traffic signal either at Oxbridge or Appledowre is still a viable part of the final project design."

SHA Response: SHA will continue to work with the Brandermill community.

Noise barriers of various lengths and heights, built on the shoulder of MD 355 have been tested at 3 noise receptor sites (N-9, N-11 and N-13) adjacent to Brandermill. The reduction in noise resulting from the barriers ranges from 10 to 11 dBA, bringing noise levels below FHWA noise abatement criteria. The barriers will be further studied during final design.

A traffic signal at either Oxbridge or Appledowre is still being considered as part of final design.

**5. Mr. Frank Heary, Fox Chapel resident**

Comment/Question: A long-time resident of Fox Chapel, Mr. Heary spoke about the difficulties in getting onto MD 355 due to the heavy traffic, especially during rush hour. He also mentioned the fact that Gunner's Branch no longer connects to Middlebrook Road allowing access to MD 355 from Fox Chapel.

SHA Response: Congestion and traffic flow on MD 355 will improve as a result of this widening project.

**6. Mr. Darah Kehnemuyi, UpCounty Citizens Advisory Board**

Comment/Question: The UpCounty CAB supports the widening of MD 355. "It is clear to us that the project should receive the highest priority. We believe that Alternate 3 with five to six lanes is the preferred alternative." The Board does not have a position on the bridge options, however, it is in favor of protecting both the Cider Barrel and the 53-inch (diameter) oak tree. "We ask you to move forward with this project as rapidly as possible."

SHA Response: See response to Comment 3.

In order to avoid up to ten residential displacements, the 53-inch (diameter) oak tree avoidance option has been dropped from consideration and the tree will be removed.

**7. Mr. Jules Korner, Fox Chapel resident**

Comment/Question: It is Mr. Korner's belief that the projected traffic for MD 355 will not necessitate the proposed widening; recent improvements to Middlebrook Road/I-270 have meant fewer cars on MD 355. He suggested the following actions to improve traffic flow: "finish widening [MD] 355 north of Middlebrook Road . . . at the bottleneck, and straighten the road in sections which are hazardous." Mr. Korner believes future work trends, such as telecommuting, flexible work hours, and increased part-time work will result in fewer people commuting at peak hours. He went on to say that "the cost-effectiveness of well-planned and -executed mass transit systems has been shown to far outweigh that of highway systems. Why not pursue more vigorously the light-rail option from Shady Grove metro station as set out in the Germantown Master Plan?"

SHA Response: Projections indicate that despite improvements to other area roadways, including I-270 and Middlebrook Road, there is a need to increase capacity on MD 355.

Though mass transit options were not specifically addressed as part of this project, they were included in an earlier study for the area. The 1990 Maryland State-wide Commuter Assistance Study investigated transit alternatives for the I-270 corridor including MD 355, concluding that mass transit in the area would be associated with the interstate and not MD 355 which is primarily a collector route for I-270.

**8. Mr. John Belding, Montgomery Village Foundation Board of Directors**

Comment/Question: The Board of Directors feels "that the [MD] 355 corridor needs to be expanded and, in fact, we support Alternate 3, with six lanes." The organization also supports major improvements at Montgomery Village Avenue and MD 355 and a number of other road projects. He asked that "due deliverance be taken as far as noise abatement and environmental concerns thought the area."

SHA Response: No response necessary.

**9. Mr. Richard Wilder, Potomac Valley Environmental Group**

Comment/Question: After years of testifying against environmentally destructive road projects, this group is happy to learn that this road project is in the planning/design stage. Mr. Wilder stated that the group preferred a six-lane road with a long bridge, and that the alignment should shift to save the hundred-year-old 53-inch (diameter) oak. The group prefers a bridge size eight feet narrower than the corresponding typical section, and a 40 mile-per-hour design speed. The alignment should shift to the east "to protect the wooded wetlands on the west side within Seneca Creek [State] Park."

SHA Response: See response to Comment 6.

Regarding the width of the bridge, the bridge is actually two freestanding structures with three travel lanes in each direction, an eight-foot divided median and the requisite shoulder areas. The median is a minimal, standard size to ensure safe transition from the bridge to the divided roadway at either end. Allowances have also been made for a hiker/biker trail throughout the project, while the five-foot sidewalk on the east side has been eliminated from the bridge.

Alternate 3 includes an east shift through the park resulting in an avoidance of the wetlands on the west side of the creek.

**10. Ms. Jane Wilder, Citizens to Save South Valley Park and Whetstone Run**

Comment/Question: The citizens group is very happy to see this project moving ahead. The group's principal concern is with the 53-inch (diameter) oak, and would endorse the eastern shift that has been described as an attempt to preserve the tree. In the stream valley area Ms. Wilder would endorse the eastern shift, and she believes a narrow bridge with a minimal median would have the least impact on the stream valley. Ms. Wilder remarked on the natural beauty of the area, and expressed hopes that the best stormwater management practices will be enforced.

SHA Response: See response to Comment 6.

See response to Comment 9.

The use of Best Management Practices (BMPs) in conjunction with the stream crossing, will be implemented with the project, both during construction when sedimentation may occur due to clearing and excavation, and in the operation of the completed roadway.

**11. Ms. Jan Watson, Montgomery Village Citizens Coalition**

Comment/Question: The coalition is in favor of the widening of MD 355, believing that "the people who use the road have suffered long enough and that only Alternate 3 would make it up to them." The group would like to see a higher bridge to protect the stream, and substantial noise abatement for the Brandermill community. It is hoped that "the county and the state would never again allow a community to be built that close to a proposed highway."

SHA Response: A long bridge over Great Seneca Creek results in increased stream protection since it spans a greater distance than a shorter bridge. Alternate 3 includes a 320-foot bridge with a 13.5 foot clearance for both wildlife and recreation passage. Section II further describes the environmental impacts of this structure.

See response to Comment 4.

**12. Mr. Al Lukas, Cider Barrel Mobile Home Park**

Comment/Question: Mr. Lukas spoke on behalf of William Cross who owns the Cider Barrel Mobile Home Park and adjacent property on Frederick Road. Mr. Lukas noted that the project planning drawings and the environmental impact statement make incorrect references to the Cider Barrel Mobile Home Park, confusing it with Oakcrest Trailer Court. Mr. Cross is concerned that the proposed project would limit access to the Mobile Home Park and the Cider Barrel historic structure by restricting turning movements on MD 355. Mr. Lukas noted that this inconvenience could become a difficulty when transporting mobile homes, or for an emergency vehicle. The driveway being constructed in connection with the MD 118 relocation project does not align with Oxbridge Road and is too steep for use with mobile homes. "Mr. Cross very strongly requests that full access to the property be retained by providing a median cut at the present driveway location to the property." Additionally, he would like to see appropriate steps taken to mitigate anticipated higher noise levels along MD 355 to bring them within acceptable FHWA standards.

SHA Response: Corrections to the EA document drawings have been made.

The relocation of MD 118 will have an affect on MD 355 in the vicinity of Cider Barrel Mobile Home park. Full access to the mobile home park would be associated with the Oxbridge Drive median opening. SHA will play an important role in any future coordination for development of full access to the site.

Noise mitigation for this location was investigated and found not to be justified (see Section II, Noise Barrier Analysis, receptor site N-8) Both the presence of existing noise at the site that would not be adequately mitigated and the physical constraints of the driveway, preclude the construction of a noise wall.

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**13. Mr. Kirk Patton, Citizen**

Comment/Question: Mr. Patton is very concerned about the potential effects of the widening of MD 355 upon his yard and house. Depending on the alternative, the road could severely affect his yard, or eliminate his house. He questioned the need to improve MD 355 if the county has already purchased right-of-way for M-83. While Mr. Patton and his family also admire the 53-inch (diameter) oak tree, he questions the community's priorities for trees over people, and asks "at what cost are we protecting the environment, both in dollars and in peoples' lives affected?" If MD 355 is widened, Mr. Patton believes it should be to the minimum width, as in Alternative 2.

SHA Response: Any personal property takes, for which there will be fair and just compensation, will not be determined until the final design phase at which time a Right-of-way Agent will notify the affected parties. Design for the project is scheduled to begin in the spring of 1993. You may request a booklet entitled *Your Land and Your Highways, Your Rights and Benefits* from SHA at 707 North Calvert Street, Baltimore, MD 21203-0717.

M-83 is a county project specified in the County Master Plan. A comparative study between these two roadways was conducted which determined that in the future, both M-83 and MD 355 will be needed and there is a more pressing need to improve MD 355 at this time.

See response to Comment 6.

Only a six-lane improvement as in Alternate 3 will provide sufficient capacity anticipated for the future development of the area.

**14. Mr. Paul Duenas, Citizen**

Comment/Question: Mr. Duenas is Mr. Patton's neighbor, and shares many of his concerns for his own property. Mr. Duenas questions the need for such a wide alignment, including the 20-foot median. He is also concerned with the potential noise and disruption anticipated with the construction project, wanting to know the proposed hours of construction. In addition, Mr. Duenas wanted to know why MD 355 is being widened at all before I-270 is widened north of MD 118. In the event the houses and yards are spared, Mr. Duenas would like to see large fencing and noise abatement shield his home from the wider MD 355.

SHA Response: See response to Comment 13.

See response to Comment 9.

Construction noise mitigation measures include scheduling of construction operations to minimize interferences with noise sensitive activities, restricting heavy truck access to certain streets and to time of day, and ensuring that all construction equipment has mufflers and other noise reduction devices.

Despite programmed improvements to I-270, MD 118 and other area roadways, there is still a need to increase capacity on MD 355. Therefore, SHA is proceeding with this project.



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A noise barrier was investigated at this location (see Section II, Noise barrier analysis, receptor N-16). It is not justified due to the presence of driveways and local streets and the fact that abatement would only be 2 to 5 dBA.

**15. Ms. Betty Rogers, Citizen**

Comment/Question: Ms. Rogers' parents recently moved out of a house on MD 355 at Plummer Drive. She is concerned about trying to sell a property which is affected by the pending road project. Ms. Rogers attended the hearing to plead that the project move ahead as quickly as possible so that she and her elderly parents can deal with the sale of the house.

SHA Response: In light of the hardship anticipated for this property, early right-of-way acquisition has been initiated.

**16. Mr. Tony Santangelo, Germantown Citizens Association**

Comment/Question: The association believes widening MD 355 is for the betterment of Germantown and the whole upcounty community, but the GCA asks that sidewalks and/or bike paths be liberally included in the final design. The GCA also requested that a careful examination for the environmental impacts crossing Seneca Creek be taken into consideration. "The GCA calls on elected officials . . . to bring this road improvement to its fruition as soon as possible."

SHA Response: See response to Comment 3.

Options to cross Great Seneca Creek have been weighed for their environmental impacts. See response to Comment 11, and Section II for further discussion of environmental consequences.

**17. Mr. Timothy Dugan, Greater Gaithersburg Chamber of Commerce**

Comment/Question: The Chamber of Commerce supports Alternate 3, believing it to be a safe, environmentally sound road design, and they believe it will be good for the development of the area.

SHA Response: No response necessary.

**18. Ms. Susan Dyszel, Citizen**

Comment/Question: Ms. Dyszel advocates the inclusion of sidewalks in the MD 355 project, and she believes safe sidewalks should be a "prime consideration regardless of what the ultimate width of the highway is."

SHA Response: See response to Comment 3.

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**MARYLAND ROUTE 355 IMPROVEMENTS  
FROM MD 27 TO MD 124  
CONTRACT NO. M611-101-371**

**FINDING OF NO SIGNIFICANT IMPACT**

**VI. CORRESPONDENCE**

The following presents the written comments received during or subsequent to the Combined Location/Design Public Hearing. Originals of this correspondence are available for review in the Project Development Division offices, State Highway Administration, 707 N. Calvert Street, Baltimore, MD 21202. Oral comments received during the hearing are presented in Section IV of this document.

**A. Written Comments Received During And Subsequent To The Combined Location/Design Public Hearing**

- 1. Community Association and Citizen Letters
- 2. Elected Officials Letters

A total of 24 community written responses were received during the Combined/Location Design Public Hearing comment period. A summary of the comments follows.

- Nine people wrote in favor of widening MD 355 under Alternate 3, the six-lane alternative.
- Seven people are concerned with access and/or the lack of traffic signals at various intersections along the project including Shakespeare, MD 118/Neelsville Church, Fox Chapel and Game Preserve Road. Additionally, two people wrote concerning access to the Cider Barrel Mobile Home Park and North Gaithersburg Shopping Center.
- Six people wrote in favor of minimizing adverse impacts of the widening to the environment, specifically Great Seneca Creek, its associated wetlands and forest, through the use of state-of-the-art mitigation.
- Six people commented about the 53-inch (diameter) oak tree. Three people wrote in favor of saving the tree and 3 people wrote against spending the money to save the tree.
- Five people feel that improvements to other roadways should preclude the widening of MD 355.
- Five people are concerned about air pollution and noise impacts to the area, including specific personal properties.
- Three people are concerned about the cost of the project in light of the tight fiscal times. One person felt that the expenditure is not warranted if the level-of-service for MD 355 is the same under both the No-Build and build alternatives.
- Three people wrote in favor of the east shift option across Great Seneca Creek.
- Three people are in favor of pedestrian/bike trails and access throughout the project corridor.
- Two people are concerned about access to and takes of personal property. A third person is concerned about property devaluation with the expected increased traffic on MD 355.
- Two people are concerned about the lack of public transportation associated with improvements to MD 355.
- Two people wrote in favor of minimizing impact to the Cider Barrel historic site.

**B. AGENCY COORDINATION**

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**1. Letters**

<u>DATE</u>	<u>AGENCY</u>
9/23/92	Maryland Department of Natural Resources
9/23/92	Maryland Department of the Environment
6/18/92	Maryland Historical Trust
8/20/92	Maryland Historical Trust
9/17/92	Maryland Historical Trust
10/13/92	Maryland Department of Natural Resources
10/14/92	MD DNR - Resource Conservation Service
10/22/92	U.S. Environmental Protection Agency
9/17/92	U.S. Department of Transportation
10/28/92	U.S. Army Corps of Engineers
11/2/92	U.S. Department of the Interior
9/17/92	Maryland Office of Planning
12/16/92	MD Office of Planning - Clearinghouse
12/1/92	City of Gaithersburg
10/21/92	Audubon Naturalist Society
12/2/92	Montgomery County
10/19/92	Sierra Club
10/1/92	Maryland Department of the Environment
10/26/92	Maryland Department of the Environment
6/16/93	Maryland Department of the Environment
6/1/93	Advisory Council on Historic Preservation
8/16/93	Coastal Resources

Concurrence

6/15/93	Request to Federal Highway Administration
7/12/93	FHWA concurrence
7/13/93	Request to National Park Service
7/21/93	NPS concurrence
6/16/93	Request to U.S. EPA
7/28/93	U.S. Environmental Protection Agency
6/16/93	Request to Army Corps of Engineers
8/17/93	U.S. ACOE response
8/16/93	Request to U.S. Fish & Wildlife Service
8/24/93	Internal memo re: U.S. FWLS
6/16/93	Request to MD Office of Planning
7/26/93	MD OP response
8/6/93	MD Department of Environment
6/16/93	Request to MD Dept. Natural Resources
8/12/93	MD DNR response
6/16/93	Request to Maryland Historical Trust
6/28/93	MHT concurrence

**2. Meeting Minutes**

<u>Date</u>	<u>Agencies</u>
12/14/92 Pre-recommendation Meeting	Maryland SHA Montgomery County DOT Parsons Brinckerhoff RK&K
1/20/93 Interagency Meeting	Maryland SHA Maryland DNR US ACOE US EPA US FWS MHT
2/16/93 Follow-up Pre-recommendation Meeting	Maryland SHA Montgomery County DOT M-NCPPC Parsons Brinckerhoff RK&K Greenhorne & O'Mara
4/21/93 Interagency Meeting	Maryland SHA Maryland DNR Maryland Office of Planing NMFS FHWA US FWS US EPA US ACOE

**C. WETLANDS MITIGATION**

<u>DATE</u>	<u>AGENCY</u>
2/26/92	Maryland Historical Trust
4/29/92	State Highway Administration
7/29/92	Federal Highway Administration
4/20/93	Maryland-National Capital Park and Planning Commission
5/12/93	SHA - Environmental Program Division
8/23/93	SHA - Property Deed
8/4/93	SHA - wetlands mitigation
9/8/93	MD Department of the Environment

**VI. CORRESPONDENCE**

**A. Community Association and Citizen Letters**

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COMMENTS

RESPONSES

11809 Collins Drive  
Germantown, MD 20876

October 15, 1992

Governor William D. Schaefer  
State House  
Annapolis, MD 21401

Dear Governor Schaefer:

For two evenings I have listened to your representatives from the State Highway Administration (SHA) describe your project to widen Route 355 from Germantown to Gaithersburg. Their talks were very general and provided no details. They used maps with roads located incorrectly and properties that were mislabeled. They used graphics filled with misspelled words. One elementary school teacher was heard to remark that she would fail any fifth grader who did such sloppy homework. Having worked in engineering for more than thirty years and taught graduate school engineering courses for many of these years, I have found that professionals with this degree of carelessness in their presentations are consistently even less careful in their detailed engineering and cost calculations. This has left me confused.

I am even more confused after listening to your series of presentations concerning the several fiscal crises in the State of Maryland. If the fiscal crisis is real, I do not understand how you can permit this massive expenditure. It will mean disruption to a large number of citizens. It will cause the loss of homes, jobs, and park land, and it will provide no traffic relief. Prior to one of the briefings I was told by your staff that the "level of service" for the roadway after your proposed massive expenditure of tax dollars would be exactly the same -- level-of-service F -- as the no-build option. Why waste tax dollars?

Germantown deserves better from SHA. I request that you direct the SHA staff to provide details, not fluff, to interested citizens of Germantown. Specifically, I request that your staff provide to us:

Mr. Edgar H. Neal  
11809 Collins Drive  
Germantown MD 20876

Dear Mr. Neal:

Thank you for your recent letter regarding the proposed widening of MD 355, between Germantown and Gaithersburg. I am sorry that you feel that you have not been able to obtain the detailed information you would like to see. I have asked State Highway Administration (SHA) staff to contact you to set up a meeting to address your specific questions and to discuss any errors you feel were contained in their presentation information.

With regard to justification for the project, the Germantown area is planned to be a major growth center during the next ten to 20 years. Traffic will increase dramatically and it will be necessary to provide additional roadway capacity to serve trips between Germantown and Gaithersburg. For this reason, the state has been supportive of Montgomery County initiatives to upgrade this section of MD 355.

I hope that by meeting with you personally SHA can provide you with the detailed answers to your questions that you are asking, and that you will be able to help SHA staff understand specific concerns that you have about the project so they can try to address those issues.

Thank you again for sharing your concerns with me. If you have any questions in the meantime, please feel free to contact Mr. Neil Pedersen, Director of SHA's Office of Planning and Preliminary Engineering. Mr. Pedersen can be reached at (410) 333-1111.

Sincerely,

Governor

cc: Mr. Neil J. Pedersen

bcc: Mr. Hal Kasoff  
Secretary O. James Lightizer  
Mr. George Walton

Prepared by George Walton, SHA, 333-1129

VI-4

47

COMMENTS

RESPONSES

LAW OFFICES  
CONROY, BALLMAN & DAMERON  
CHARTERED  
SIX MONTGOMERY VILLAGE AVENUE  
SUITE 402  
GAITHERSBURG, MARYLAND 20879

PROJECT  
DEVELOPMENT  
DIVISION

Oct 2 10 14 AM '92

JOHN M. CONROY 844-8900  
R. GEORGE GULLMAN  
J. MICHAEL GORRUP, JR.  
THOMAS D. SHROCK  
DOUGLAS M. SHAWLISH  
ROBERT C. SAMBLER  
ROBERT W. SHARLAWAN  
CHARLES M. COOKERILL  
R. BRADLEY RUFFIN  
MARK L. CORWALD  
WENDY D. HULLAND  
GLENN C. ETELSON  
JEFFREY H. LEBAN  
HECTY R. BOWMAN  
MICHAEL RUPPOLZ  
ELLEN M. A. WHITE  
RONALD A. BUTTS  
STEPHEN A. HEBBY

September 28, 1992

OF COUNSEL  
JAMES L. DAMERON

ROCKVILLE, MD  
(301) 584-3900

BETHESDA, MD  
(301) 884-8840

BOWIE, MD  
(301) 308-1400

VIENNA, VA

WASHINGTON, D.C.

\* MARYLAND AND D.C.  
\* MARYLAND, VIRGINIA AND D.C.  
\* MARYLAND, D.C. AND FLORIDA



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

October 19, 1992

Mr. Glenn C. Etelson  
Law Offices  
Conroy, Ballman & Dameron  
Six Montgomery Village Avenue  
Suite 402  
Gaithersburg MD 20879

Dear Mr. Etelson:

Thank you for your comments regarding our MD 355 project planning study. Your input in the planning process is both appreciated and encouraged.

As you requested, I have placed your name on our project mailing list. We will keep you informed as the project progresses.

If you have any further questions or comments, please feel free to contact the writer in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by: *George W. Walton*  
George W. Walton  
Project Manager  
Project Planning Division

LHE:GWW:es

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
303-7555 Baltimore Metro - 565-0451 D.C. Metro - 1-800-492-5062 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

9-1A

Mr. George Walton, Project Manager  
Project Planning Division  
P.O. Box 717  
Baltimore, Maryland 21203-0717  
  
Re: Greater Gaithersburg Chamber of Commerce  
Transportation Committee

Dear Mr. Walton:

I am the Chairman of the Greater Gaithersburg Chamber of Commerce's Transportation Committee. As you must be aware, the Greater Gaithersburg Chamber of Commerce has a tremendous interest in the expansion of Route 355 from Route 124 to Route 27. I would greatly appreciate your placing me on the project mailing list so that we may receive any future notices or other information in regards to this project.

Very truly yours,

*Glenn C. Etelson*

Glenn C. Etelson

GCE/gmg  
cc: Timothy Dugan, Esquire  
Mr. Gerry Groves  
Ms. Maggie LaMonda  
Mr. James Dauch

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COMMENTS

RESPONSES

We can go via Newville Church Road to 355 but meet with the same traffic flow problems. The only difference is that cars cannot get up a great deal of speed from the light and someone

This form is for your use to enroll your name on the project mailing list and/or for entering written comments. To do so, remove form, fold, and close by stapling or taping before mailing. All postage will be paid by the State Highway Administration

is usually already stopped making an opening (hopefully) because of the light. There has been 1 death at 355 and Shakespear. Please don't let there be another! We need a traffic light NOW!  
shakespear. 1 at 355

VI-8

89

COMMENTS

RESPONSES

Certified Mail P 377 260 373

William B. Montano  
5309 Wehewken Road  
Bethesda, Maryland 20816-3137  
October 12, 1992

PROJECT  
DEVELOPMENT  
DIVISION  
Oct 16 3 43 PM '92

State Highway Administration  
Office of Planning and  
Preliminary Engineering  
Box 717  
Baltimore, MD 21203

Subject: Questions and Comments on Contract No. M 611-151-371,  
Location/Design Public Hearing, MD 355, MD 27 to MD 124  
Held October 8, 1992 at Martin Luther King, Jr. School

Dear Ladies and Gentlemen;

Thank you for the opportunity to comment on your subject hearing. Per your request, I am submitting these questions and/or comments before October 22, 1992.

I own the property on the northwest corner of the intersection of MD 355 and Plummer Drive at the entrance to Fox Chapel, the address there is 19216 Plummer Drive. I have the following comments:

1. Noise Impacts

After studying the Noise Impacts section of your Environmental Assessment/Section 4(f) Evaluation beginning on page IV-23 and listed on Table IV-12, I conclude that you have considered the noise levels affecting the ten properties to the north of mine and have chosen to mitigate them with a barrier 800 ft by 14 ft. Your discussion and tables show no consideration for the noise levels on my property. In fact, the proposed barriers stop at my property line.

Since you will be removing the trees and arbor vines that currently stand between my property and MD 355 and be moving the road closer to my house (an in fact taking some of my property) as well as widening my exposure to noise from the southeast via the wider roadway, I think it is obvious that noise levels at my house will far exceed those reaching the ten houses to the north of me when they are protected by your proposed sound barrier.

I think it is also very obvious that the increased noise levels will severely impact on my ability to sell or rent my property to prospective occupants. This will result in a substantial financial hardship to me for which I will have to be compensated.

Based on the lack of discussion of my property with respect to noise levels, I believe you have not given this problem adequate consideration. I urge you to do so and to consider either providing the additional sound barriers necessary to protect my property or give consideration to purchasing the entire property and using it as a buffer zone as you are doing with the house directly across the street from mine.



Maryland Department of Transportation  
State Highway Administration

O. James Lightizer  
Secretary  
Hal Kassoff  
Administrator

November 10, 1992

Mr. William B. Montano  
5309 Wehewken Road  
Bethesda MD 20816-3137

Dear Mr. Montano:

Thank you for your comments regarding our MD 355 project planning study. Your input in the planning process is both appreciated and encouraged.

As part of our project planning study, a noise analysis was completed and prepared for the Environmental Assessment/Section 4(f) Evaluation. Part of the analysis is to locate areas where the Federal Highway Administration Noise Abatement Criteria of 67 dBA is approached or exceeded in the design year of the project. The design year for MD 355 is 2015. These areas were identified in the environmental document. Recaptor N-17 represents the ten houses which were identified for possible mitigation along the MD 355 roadway between Chapel Gate Road and Plummer Drive and your house was included. There were two houses further back on Millport Circle that were not included.

The noise levels for both Build Alternates exceed the Federal Highway Administration's 67 dBA criteria by 1 dBA. A barrier would reduce the noise levels by 10 dBA between Chapel Gate and Millport Circle at the ten houses and leave enough room for slight distance at the intersections. Barriers at this location will be evaluated further in the final design phase of the project.

Your comments concerning access to Middlebrook Road will be investigated. If it turns out to be feasible, it may be included as part of the recommendation for the project.

Your comments will be considered as our decision making process continues and will be entered as part of our official records.

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 565-0461 D.C. Metro - 1-800-492-5062 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

VI-1A

92

COMMENTS

RESPONSES

State Highway Administration  
Office of Planning and Preliminary Engineering  
October 12, 1992, page two

I request your earliest possible response to my comments on the noise level problem.


2.0 "54 inch Oak Tree Between Chapel Gate Road and Scenery Dr.

I love trees! I have always been opposed to residential developers who remove trees from areas they are developing to ease in their construction efforts. However, I must say that during the more than ten years that I lived at my Plummer Drive property and frequently drove north on MD 355, I never gave significant notice to the subject 54" oak tree. While I admire your efforts in trying to preserve some of the significant areas near MD 355 and your efforts to mitigate impacts on the wetlands around Sanaca Creek to the south of my property, I consider efforts to save this particular tree by altering the path of the proposed highway and the subsequent displacement of (destruction of) several residences to save one old oak tree of little significance to be an outrageous waste of the public funds! You have my verbal, moral and voting support in removing the tree.

3.0 Access to Middlebrook Road from Fox Chapel (North).

I agree with the (not so eloquently stated) senior citizen's comments at the October 8th meeting vis a' vis the access to Middlebrook Road from Fox Chapel. You have already muddled up a significant avenue of egress from Fox Chapel by altering the path of Gunnar's Branch Road. I recommend returning Gunnar's Branch access to Middlebrook road via the existing traffic light intersection at Observation Drive. (About where it used to be!) This should significantly alleviate the hardship many commuting residents of Fox Chapel will have in trying to get to Middlebrook Road and I-270 by first having to fight their way onto a newly widened, six lane, MD 355, surrounded by shopping centers and other retail activities.

Thanks again for the opportunity to comment on these matters.

Sincerely,  
  
William B. Montano

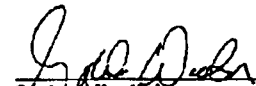
Mr. William B. Montano  
Page Two

If you have any further questions or comments, please feel free to contact the writer in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by:

  
George W. Walton  
Project Manager  
Project Planning Division

LHE:GWN:as

cc: Ms. Barbara Allera-Bohlen

VI-11

21

COMMENTS

RESPONSES

STATE HIGHWAY ADMINISTRATION  
QUESTIONS AND/OR COMMENTS

CONTRACT NO. # 611-151-371  
LOCATION/DESIGN PUBLIC HEARING  
MD 355  
MD 27 TO MD 124  
THURSDAY, OCTOBER 9, 1992 @ 7:30 P.M.  
MARTIN LUTHER KING, JR. IMMEDIATE SCHOOL  
PONS NO. 153397

NAME STEPHEN G. PETERSON DATE 10/17/92

PLEASE PRINT ADDRESS 16628 S. WESTLAND DRIVE

CITY/TOWN GEITHORESBURG STATE MD ZIP CODE 20877

I/We wish to comment or inquire about the following aspects of this project:

I would like to see a second air support of  
the construction of this project in accordance  
with the presentation of the subject hearing.  
Among the alternatives, the six-lane divided design  
is the most practical and realistic for the long  
term. Anything less will simply set up the area for  
further disruption at a later date. Having been able  
to compare highway improvements in both MD & VA, the  
MD design for six-lane facilities yields a superior  
facility with excellent operating characteristics and long

Please add my/our name(s) to the Mailing List.

Please delete my/our name(s) from the Mailing List. due to unavailability

\*Persons who have received a copy of this brochure through the mail are already on the project Mailing List.

*[Handwritten signature]*



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hel Kassoff  
Administrator

November 4, 1992

Mr. Stephen G. Petersen  
16628 S. Westland Drive  
Geithoreburg MD 20877

Dear Mr. Petersen:

Thank you for your comments regarding our MD 355 project planning study. Your input in the planning process is both appreciated and encouraged.

Your support for Alternative 3 (6-lane divided roadway) will be considered as our decision making process continues and will be entered as part of the official records. As you requested, your name will be added to the project mailing list and we will keep you informed as the project progresses.

If you have any further questions or comments, please feel free to contact the writer in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by: [Signature]  
George W. Walton  
Project Manager  
Project Planning Division

LHE:GWW:ea

My telephone number is \_\_\_\_\_

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383-7555 Baltimore Metro - 868-0451 D.C. Metro - 1-800-982-5082 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

VI-12

02

COMMENTS

RESPONSES

STATE HIGHWAY ADMINISTRATION  
QUESTIONS AND/OR COMMENTS

CONTRACT NO. R 411-151-171  
LOCATION/DESIGN PUBLIC HEARING  
MD 355

MD 27 TO MD 124  
THURSDAY, OCTOBER 8, 1992 @ 7:30 P.M.  
HARPER LUTHER KING, JR. ELEMENTARY SCHOOL  
PMS NO. 153397

NAME Fox Chapel Comm. Assn. of Chuck Smith DATE 10/10/92

PLEASE PRINT ADDRESS 19101 Plummer Drive

CITY/TOWN Germentown STATE MD ZIP CODE 20876

I/We wish to comment or inquire about the following aspects of this project:

What will happen with the white brick entrance walls on Plummer Drive? Neighborhood identity will suffer if they go. Would completion of M-83 reduce traffic on 355 enough to obviate widening? Since the 270-Middlebrook link was completed I've not seen a traffic queue on 355 on my daily commute. Are more signals planned for intersections? As it stands, a traffic light at Plummer & 355 would meet the needs of Fox Chapel residents. Perhaps a northbound turning lane would ease congestion.  
The proposed ablet to save an example of a non-endangered species of oak tree is ludicrous when compared to the cost of acquiring numerous properties and relocating many people. Most people didn't even know that tree was there!  
If eliminating a landscaped median would save on relocating homes why not do it? Coupled with Alternate 2, cost would be drastically curtailed. Overall, less could wind up being more. For nearly 25 years Fox Chapel has been a landmark community on 355 and its citizens deserve to have their mark of distinction. If the walls must

- Please add my/our name(s) to the Mailing List.  
 Please delete my/our name(s) from the Mailing List.

\*Persons who have received a copy of this brochure through the mail are already on the project Mailing List.  
be removed they should be rebuilt and landscaped as they were originally. Thank you for your attention.  
PRES. Chuck Smith - FCCA.



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

October 30, 1992

Mr. Chuck Smith  
President  
Fox Chapel Community Association  
19101 Plummer Drive  
Germentown MD 20876

Dear Mr. Smith:

Thank you for your comments and for requesting information regarding the MD 355 project and how the proposed widening will effect the community. Your input in the planning process is both appreciated and encouraged.

You expressed concern with the widening affecting the brick walls at the entrance of Plummer Drive. The widening will effect that portion of the property. Please be assured that every effort will be made to either replace the walls or to make a payment for the taking. An actual take of the property will not be determined until the final design phase is underway. At that time, a Right-of-Way Agent from our District #3 Office of Real Estate will notify the affected property owners. The design phase of this project is scheduled to begin in the Spring of 1993. To assist you in understanding the land acquisition process, I am sending you a booklet entitled, "Your Land And Your Highways Your Rights And Benefits".

In reference to your question on M-83 vs. MD 355 widening, I have enclosed for your information, a Comparative Study Report (February, 1991) prepared by our office. This report explains the issue of whether both roadways are needed. Based on current projected rates of development in the Germentown and Clerksburg areas, both M-83 and a six-lane MD 355 will be needed by 2010.

Traffic signals have been looked into at various intersections during our project planning study. Further investigations and traffic signal analyses will be done during the final design phase.

Your comments will be considered as our decision making process continues and will be entered as part of our official records. We will keep you informed as the project progresses.

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
303-7666 Baltimore Metro - 585-0451 D.C. Metro - 1-800-482-8062 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

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COMMENTS

RESPONSES

Mr. Chuck Smith  
Page Two

If you have any further questions or suggestions please feel free to contact the writer in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by: *George W. Welton*  
George W. Welton  
Project Manager  
Project Planning Division

LHE:GW:es  
Enclosures (2)

cc: Mr. Richard Revenecroft (w/incoming)  
Mrs. Wendy Wolcott

VI-14

*GW*

COMMENTS

RESPONSES

STATE HIGHWAY ADMINISTRATION  
QUESTIONS AND/OR COMMENTS

CONTRACT NO. # 611-151-372  
LOCATION/DESIGN PUBLIC HEARING  
MD 355  
RD 27 TO RD 124  
THURSDAY, OCTOBER 8, 1992 @ 7:30 P.M.  
MARTIN LUTHER KING, JR. ELEMENTARY SCHOOL  
FORM NO. 153397

NAME Fred C. Smith DATE 10/19/1992

PLEASE PRINT ADDRESS 19114 N. Frederick Road

CITY/TOWN Gaithersburg STATE Maryland ZIP CODE 20879

I/We wish to comment or inquire about the following aspects of this project:

As stated in my conversation with Mr. Walton on 10/15/92,  
I am concerned regarding the Right of Way in front of my home  
at the address noted above on North Frederick Road. According  
to the drawing exhibited at the hearing on 10/8/1992, the two  
houses on both sides of me are listed to be relocated. I  
can't understand why my house is eliminated from the relocation,  
since all three houses complied with the required set back  
according to Montgomery County Building Code at the time of  
construction.

During the 32 years I have lived here, the highway has  
been black-topped three or four times, which has resulted  
in all the water from the present 355 being turned down my  
driveway, causing me quite a lot of water damage.

I have seen quite a number of deaths in front of my  
house during these 32 years. Just last week a driver failed  
to make the curve and split the large electric pole in half  
and was hospitalized. I am eager to see the final six lanes  
in progress. Believe me, this is at least 20 years too late.

Please add my/our name(s) to the Mailing List.\*

Please delete my/our name(s) from the Mailing List.

\*Persons who have received a copy of this brochure through the mail are already on the project Mailing List.



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

November 5, 1992

Mr. Fred C. Smith  
19114 N. Frederick Road  
Gaithersburg MD 20879

Dear Mr. Smith:

Thank you for your letter concerning our MD 355 project planning study. Your comments are appreciated and will be considered during the remainder of the study.

In the next phase of the study, a detailed analysis will be completed that will outline specifically what properties are impacted and what is the extent of the impact. At the time of the public hearing, estimates were made based on the information available. At that time, we presented your two neighboring houses as full takes. As we move into more detail, these may not be full takes; likewise, your property may become a full take. This information will be developed and included in the final environmental document which is scheduled to be completed by the Spring of 1993. We will keep you informed of the decisions.

If you have any further questions or comments, feel free to contact me in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by: George W. Walton  
George W. Walton  
Project Manager  
Project Planning Division

LHE:GWW:ee

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 588-0451 D.C. Metro - 1-800-422-5042 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

VI-15

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COMMENTS

RESPONSES



MONTGOMERY VILLAGE FOUNDATION, INC.

10120 APPLE RIDGE ROAD
P.O. BOX 2130
MONTGOMERY VILLAGE, MARYLAND 20886-2130
(301) 948-0110 FAX (301) 990-7071

October 8, 1992

Mr. Neil J. Pedersen, Director
Office of Planning and Preliminary Engineering
State Highway Administration
Box 717
Baltimore, MD 21203

Dear Mr. Pedersen:

The Montgomery Village Foundation, the homeowners' association representing the more than 32,000 residents of Montgomery Village, once again welcomes the opportunity to comment on the Maryland Route 355 project. This is a project which the Foundation has encouraged and supported for many years.

Following the first Public Hearing in the spring of 1991, the Foundation studied the considered alternatives and developed a position in support of the six-lane, 40 mph alternative. We continue to support this alternative since we feel it is the choice which will meet the traffic needs of the Gaithersburg/Montgomery Village/Germantown corridor as defined by area Master Plans and the original "Wedges and Corridors" planning study of the early 1960's.

The Foundation is aware that all design alternatives impact wetlands and parklands along the alignment. We ask that careful consideration be given to the environmental impact of the project and that state-of-the art mitigation measures be applied.

We anxiously await this needed highway improvement. Not only will safety be improved along this highly traveled route, we feel certain that an improved six-lane Route 355 will relieve traffic congestion and delay or negate the need for M-83.

Sincerely,
Walter A. Braun
Walter A. Braun
President

PROJECT DEVELOPMENT DIVISION
OCT 14 2 51 PM '92

25 YEARS OF SERVICE TO THE COMMUNITY



Maryland Department of Transportation
State Highway Administration

O. James Lighthizer
Secretary
Hal Kassoff
Administrator

November 2, 1992

Mr. Walter A. Braun
President
Montgomery Village Foundation, Inc.
10120 Apple Ridge Road
P.O. Box 2130
Montgomery Village MD 20886-2130

Dear Mr. Braun:

Thank you for your recent letter commenting on our MD 355 project planning study. Your input in the planning process is both appreciated and encouraged.

Your support for Alternative 3 will be considered during our decision-making process. We will keep you informed as the project progresses.

If you have any further questions or comments, please feel free to contact me or the project manager, Mr. George Walton. George can be reached in Baltimore at (410) 333-1139 or toll free in Maryland at 1-800-548-6028.

Very truly yours,

Neil J. Pedersen

Neil J. Pedersen, Director
Office of Planning and
Preliminary Engineering

cc: Mr. Louis H. Ege, Jr.
Mr. George Walton

My telephone number is (410) 333-1110

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382-7555 Baltimore Metro - 585-0451 D.C. Metro - 1-800-482-8082 Statewide Toll Free
707 North Calvert St., Baltimore, Maryland 21203-0717

VI-16

Handwritten initials



COMMENTS

RESPONSES

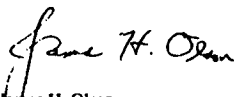
WRITTEN COMMENTS

Dear Sir:

I have some comments to make regarding the MD SHA Project to widen MD Route 355:

- I support Alternative 3 (6-lane highway).
- I have no opinion on the bridge option over Great Seneca Creek, but I do have a suggestion as to the bridge's deck layout. Specifically, I suggest that at least on one side (if not both), the normal concrete barrier erected as a guardrail be moved 5 to 8 feet from the edge. This would separate bicycle and pedestrian path(s) from the main traffic flow. The attached diagram depicts how this was done on both sides of the Wyoming Avenue Bridge over Tacony Creek (Philadelphia, PA). That bridge has a 4.5' handrail mounted along the edge for safety, but it is not high enough for bicycle riders. I suggest using the same style of fencing used throughout Maryland, i.e. fencing that is curved at the top (make sure it is 8' tall below the curve - bicyclists could stand while on their bikes).
- The design speed of both proposed Alternatives (except the on-build) is 40 M.P.H. That speed is unrealistic. Besides reducing the roadway speed from the current 45 MPH (no-build), most drivers move at safe speeds regardless of posted limits. The prevailing speed on 355 is now 40, but with the planned improvements, the safe speed on 355 will increase to 50 or 55 MPH. I strongly suggest that, since drivers will be moving at these speeds regardless of the (newly reduced) posted limit of 40, this project should be designed for real-world speeds.
- If roadway width is a problem in constrained areas, consider eliminating a sidewalk path along one side of the highway in those areas. Currently there are no sidewalks, and having one instead of none is a lot better than can suffice.
- If a design alternative is used to save the 54" tree, consider placing the tree in the new median of the highway. This would minimize impacts to neighboring houses as well as providing a nice drive under the tree (which would never spread the new road). This option would allow one roadway of the two to use the existing right-of-way, thus minimizing impact on the tree roots.
- No break in the median is provided for traffic moving straight-ahead from existing MD 118 to Neelsville Church, nor for left turns. The Church needs to keep the traffic signal at that intersection. Many colleagues of mine who work at TTC must drive to MD 27 when going home from work. They would be inconvenienced by not being able to go out from the TTC lot on existing 118 and making a left turn at 355. Since no entrances or exits to new 118 have been provided, these people would have to go through 2 additional signal-controlled intersections (the long way around). That would make traffic congestion worse on new 118 especially at 5 PM, right when rush hour traffic in Germantown peaks. Besides TTC, this also affects residents of existing 118, Fox Run Apartments, and exit access from the Germantown Medical building at Observation Drive and 118.
- I have heard that many bicyclists prefer riding in regular traffic lanes rather than using provided bike paths. The main reason for this preference is simple: the bike paths are too bumpy! If they were graded the same way as the main road, and advertised as being just as smooth, bikers will be glad to get out of traffic lanes where they risk life and limb. On this project, with 355 being the major North-South artery in this region, we have the best chance to get bikers off the road where they are in danger. I'm also suggesting a change in bridge layout to allow bikes to get across Great Seneca Creek without having to ride next to high-speed traffic.

Sincerely,



James H. Olson  
P.O. Box 1238  
Germantown, MD 20874



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

October 30, 1992

Mr. James H. Olson  
P.O. Box 1238  
Germantown MD 20874

Dear Mr. Olson:

Thank you for your letter concerning our MD 355 project planning study. Your comments are appreciated and will be considered during the remainder of the study.

I have forwarded a copy of your bridge layout to our Bridge Design Division. They will review it and consider it as an alternative.

The design speed for the project is 40 MPH. The anticipated posted speed for the roadway is 35 MPH. This is a "real-world" speed for a facility of this type. With the character that not only exists but is planned for the corridor, the design is complimentary to those features.

The idea of providing a sidewalk on only one side of MD 355 in order to reduce property impacts will be considered as part of the final recommendation.

The widening of the median to save the 54" White Oak tree was considered. It is not preferred for two reasons. First, the tree needs approximately a 100' radius of clear space around it to survive. Surrounding the tree with roadway does not provide adequate space for the root system to function properly. Second, for obvious safety reasons, it is not desirable to have such a large fixed object in the median of a roadway.

The traffic signal at the existing intersection of MD 355 and MD 118 will be moved as part of the MD 118 Relocation construction. The entrance to the church at this location is also planned to be removed as part of developer construction scheduled for next year. Agreements have been reached between the church, the developers, the county and the state to provide a new church entrance off Neelsville Church Road in the rear of the church site. Further, with construction of Shakespeare Boulevard, Observation Drive and other roadways, existing MD 118 will only serve as a collector road and not a through road. It will be cul-de-sac just west of where future Observation Drive connects to it.

The comments concerning cyclists and bikepaths will be further investigated as the study continues.

My telephone number is \_\_\_\_\_

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707 North Calvert St., Baltimore, Maryland 21203-0717

VI-17

22

COMMENTS

RESPONSES

Proposed MD Route 355 Bridge Over Greate Seneca Creek

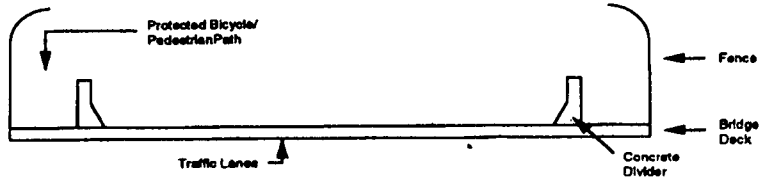
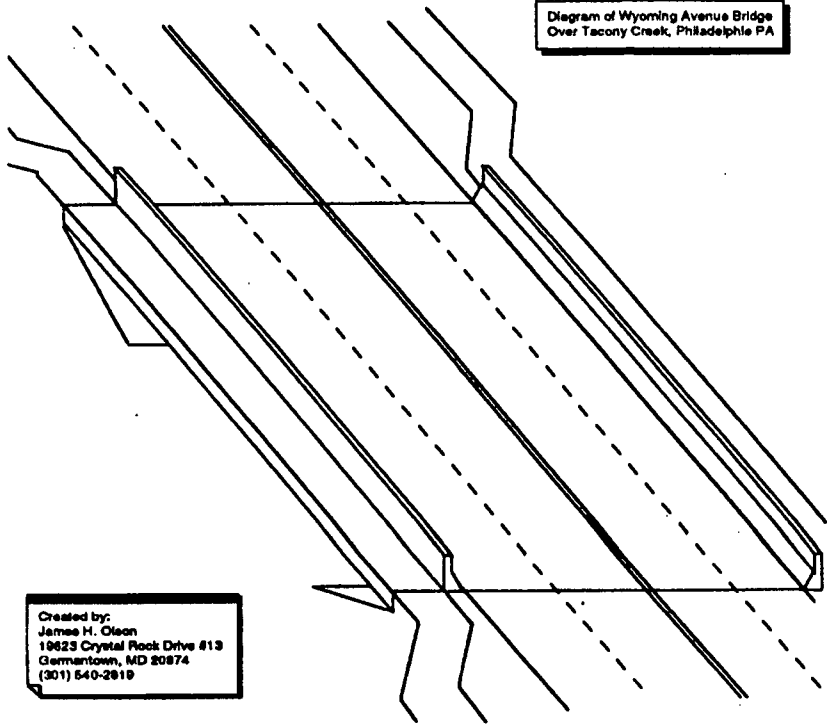


Diagram of Wyoming Avenue Bridge Over Tacony Creek, Philadelphia PA



Created by:  
 James H. Olan  
 18623 Crystal Rock Drive #19  
 Germantown, MD 20874  
 (301) 540-2619

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Mr. James H. Olan  
Page Two

Once again, thank you for your comments. If you have any further questions, feel free to contact me in Baltimore at (410) or 333-1139 or toll free, in Maryland only, 1-800-548-5026.

Very truly yours,

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

by:

*George W. Walton*  
 George W. Walton  
 Project Manager  
 Project Planning Division

LNE/GWW/ss

88

COMMENTS

RESPONSES

**SIERRA**

103 North Adams Street  
Rockville, MD 20850



**CLUB**

Montgomery County Group  
Phone (301) 294-0466

Please reply to:

James W. Clarke  
1916 Dundee Road  
Rockville, MD 20850

October 19, 1992

Mr. George Walton, Project Manager  
Project Planning Division  
P.O. Box 717  
Baltimore, MD 21203-0717

Ref: Contract No M 611-151-371, PDMS 153397

Dear Mr. Walton:

Please enter this letter as part of the record of the Location/Design Hearing held on October 8, 1992, for increasing the capacity of MD 355 between MD 27 (Ridge Road) and MD 124 (Montgomery Village Avenue).

We are very much concerned that no mass transit options were included in any of the documents we saw relating to this project. Were any type of dedicated bus lanes considered? If not why not? We see that center turn lanes were considered. Were bus pull offs also considered in the project design? If not why not?

How are pedestrians going to cross any of the design options proposed? We feel very strongly that when you design improvement to major highways like MD 355 transit options must be considered and that you must give consideration as to how pedestrians will cross any of these options, especially divided highways.

Under the recently passed federal transportation act (ISTEA) money is available for mass transit options. If Montgomery County is ever going to meet the goals of the federal Clean Air Act the feasibility of mass transit must be a major consideration in all projects of this type.

Our specific comment on the project follow. Since park land that was acquired by Program Open Space and the Land and Water Conservation Fund will be taken for this project, federal and state laws and regulations require that any land taken must be replaced with comparable land, one for one basis, we would like to know the specific parcels of land that will be purchased for replacement.

We feel very strongly that there must be a one for one replacement

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Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

October 30, 1992

Mr. James W. Clarke  
Sierra Club  
1916 Dundee Road  
Rockville MD 20850

Dear Mr. Clarke:

Thank you for your recent letter concerning our MD 355 project planning study. Your comments are appreciated and will be considered during the remainder of the study. As you requested, your letter will be included as part of the official record from the October 8, 1992 Location/Design Public Hearing.

Though mass transit options were not specifically addressed as part of this project planning study, they were included in an earlier study for the area. The 1990 Maryland Statewide Commuter Assistance Study investigated transit alternatives for the I-270 corridor between Frederick and Washington, D.C. Included in the study corridor was MD 355. I have enclosed the chapter of the Commuter Assistance Study for the I-270 corridor. It discusses the alternatives tested and the subsequent recommendations.

The center turn lanes that were considered as part of Alternative 2 are intended to handle left turn movements. By having this turn lanes, we are able to provide continuous access to properties. Bus pull outs were not considered in this study. We have found that bus drivers do not like them. They tend not to pull in since they have a difficult time in pulling out and merging into traffic.

Protected pedestrian movements will be provided at all signalized intersections. At this point of the study process, we have not determined specifically which intersections will be signalized. This is part of the final design process.

The replacement of wetlands is based on their type. In the case of MD 355, the wetlands that would be impacted are forested. This type of wetland requires a two for one replacement ratio. In regards to the location of replacement sites, every effort is made to locate within the same watershed as the original wetland. At this time, we are in the process of locating the sites for replacement wetlands. Final determinations will be made prior to submittal for any permits from the environmental regulation agencies.

My telephone number is \_\_\_\_\_

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707 North Calvert St., Baltimore, Maryland 21203-0717

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bb

COMMENTS

RESPONSES

of all perk lend taken. It is not sufficient to state that one for one replacement will be considered as is stated in Section F "Measures to Mitigate Harm" on page V-9.

Even though Seneca Creek is a close one stream there are indication that the water quality has improved and we would like to see monitoring required before, during and after construction to measure the impacts on water quality and insure that the best management practices (BMPs) used are the ones that are best for this situation. We want to make sure that after the completion of this project there is no decline in water quality in the creek.

We agree that as much as possible the project should be constructed on the east side of the existing bridge over Seneca Creek as the wetlands on the east side are of low quality.

For the wetlands to be taken, our concern is with the migration proposal. We have not yet had an opportunity to visit the proposed mitigation sites but are troubled by the indications that wetlands will be "created" as part of the migration process. The business of wetlands creation is far ahead of the science of wetlands creation and we would feel much more comfortable if the migration sites proposed were degraded wetlands in the Seneca Creek watershed that could be restored.

Where will the reforestation efforts that are now required under state law take place? We would like to see sites identified and for the reforestation to take place as construction proceeds thus giving any reforestation effort an early start.

Enclosed is a copy of our letter to the Corps of Engineers on the wetlands issue.

Thank you for the opportunity to present our views on this project.

Sincerely,

*James W. Clarke*

James W. Clarke  
Conservation Chair  
Montgomery County Group  
Sierra Club

cc: Senator Laurence Leviten  
Delegated Gene Counihan  
Richard LaVay  
Jean Roseer

VI-20

Mr. James W. Clarke  
Page Two

As part of the permitting process, we are required to coordinate with the Maryland Department of Environment (DOE). As part of this process, water quality and potential impacts are discussed. DOE will review our proposals and determine if they are adequate. DOE will also be present on the construction site to enforce the permit agreements.

As with wetland replacement, woodland replacement is desired in the vicinity of the impact. Once again, we are in the process of locating suitable sites for replacement.

If you have any further questions or comments concerning the study, feel free to contact me in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by: *George W. Walton*  
George W. Walton  
Project Manager  
Project Planning Division

LHE/GWW/es  
Attachment

cc: Ms. Barbara Allere-Bohlen  
Ms. Linde Kelbaugh (w/ incoming)

*11*

COMMENTS

RESPONSES

SIERRA

103 North Adams Street  
Rockville, MD 20850



CLUB

Montgomery County Group

Phone (301) 794-0486  
Please Reply to:

Jane W. Clerke  
1916 Dundee Road  
Rockville, MD 20850

October 19, 1992

Mr. Paul Wettiauffer  
Corpe of Engineers  
CENAB-OB-RX  
P.O. Box 1715  
Baitimore, MD 21203-1715

Dear Mr. Wettiauffer:

This letter is the Sierra Club comment on the Maryland State Highway Administration's request for a wetlands permit under Section 404 of the Clean Water Act and/or Section 10 of the River and Harbors Act 1899 to increase the capacity of Maryland 355 between MD 27 (Ridge Road) to MD 124 (Montgomery Village Avenue).

We agree that the project should be constructed on the east side of the existing bridge over Seneca Creek as the wetlands on the east side are of low quality.

One of our wetlands concerns is with the migration proposal. We have not yet had an opportunity to visit the proposed mitigation sites but are troubled by the indications that wetlands will be "created" as part of the mitigation process. The business of wetlands creation is far ahead of the science of wetlands creation and we would feel much more comfortable if the mitigation sites proposed were degraded wetlands in the Seneca Creek watershed that could be restored.

We are also concerned with a statement that appears on page IV-21 in the Environmental Assessment/Section 4(f) evaluation report that says "Construction methods could include measures to control sediment and other run-off as these swales carry stormwater to an emergent wetland system reported to contain unique plants species approximately 700 feet to the west of the project boundary." We feel that the construction methods must include measures to protect this emergent wetlands system and look to the Corps to protect this wetland as part of its responsibility under Section 404 of the Clean Water Act.

Even though Seneca Creek is a class one stream there are indications that the water quality has improved and we would like to see

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See previous response

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COMMENTS


RESPONSES

monitoring required before, during and after construction to measure the impact on water quality and insure that the best management practices (BMPs) used are the ones that are best for this situation. We want to make sure that after the completion of the project there is no decline in water quality and we ask that the Corps do what it can to insure that there is no degradation of water quality in Seneca Creek.

I request that I be kept informed of the permit process for this wetlands permit at my address on Dundas Road as shown at the top of this letter.

Thank you for the opportunity to present our views on this project.

Sincerely,



James W. Clarke  
Conservation Chair  
Montgomery County Group  
Sierra Club

cc: Senator Laurence Levitan  
Delegates Gene Counihan  
Richard LaVay  
Jean Roeseer  
Mr. George Walton, SHA

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COMMENTS

RESPONSES

STATE HIGHWAY ADMINISTRATION  
QUESTIONS AND/OR COMMENTS

CONTRACT NO. H 611-151-371  
LOCATION/DESIGN PUBLIC HEARING  
RD 355  
RD 27 TO RD 121  
THURSDAY, OCTOBER 8, 1992 @ 7:30 P.M.  
MARTIN LUTHER KING, JR. THEREDLATE SCHOOL  
PMS NO. 153397

NAME Gale Quist, Caregiver, Dayspring Church DATE 10/6/92  
PLEASE PRINT ADDRESS 11301 Neelsville Church Rd.  
CITY/TOWN Germantown STATE MD ZIP CODE 20876

1/We wish to comment or inquire about the following aspects of this project:  
Due to scheduled church classes, we may not be represented at the 10th meeting. We of course strongly support a project to improve Route 355. Our only concern is impacts on the intersection of Neelsville Church Road (NCR hereafter). NCR is becoming ever more heavily trafficked. Stratford Knolls traffic also uses NCR for improved access to 355 during rush hours. When relocated HR is complete, traffic on 355 at NCR will be much heavier.

We are therefore concerned that the design of the 355/NCR intersection will make turning into and out of NCR reasonably possible, both to and from north and south.

Future plans for a light at Shobergon Blvd @ 355, and for extension of Shobergon Blvd. to HR Extended may help in the future, but please don't build a design that counts on this before it happens! Similarly, termination of NCR in a cul-de-sac before Blunt Rd, also in the future, will help. Again, this is very tentative since it depends on construction of H-83. Please look at the whole picture as 355 is designed! Thank you.

Please add my/our name(s) to the Mailing List.\*

Please delete my/our name(s) from the Mailing List.

\*Persons who have received a copy of this brochure through the mail are already on the project Mailing List.



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

October 27, 1992

Mr. Gale Quist  
Caregiver  
Dayspring Church  
11301 Neelsville Church Road  
Germantown MD 20876

Dear Mr. Quist:

Thank you for your comments regarding our MD 355 project planning study. Your input in the planning process is both appreciated and encouraged.

You expressed concerns about the traffic at the Neelsville Church Road/MD 355 intersection. The developer's proposed 4/5 lane construction and our Alternate 3 proposal (6 lane divided) will provide for all turning movements at that intersection. This includes a median break for traffic crossing over MD 355 and turn lanes for northbound and southbound traffic at Neelsville Church Road.

Your comments will be considered as our decision making process continues and will be entered as part of our official records. We will keep you informed as the project progresses.

If you have any further questions or comments, please feel free to contact the writer in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by: George W. Welton  
George W. Welton  
Project Manager  
Project Planning Division

LHE:GWN:es

cc: Mr. William Hellmenn

My telephone number is \_\_\_\_\_

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707 North Calvert St., Baltimore, Maryland 21203-6717

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COMMENTS

RESPONSES

STATE HIGHWAY ADMINISTRATION  
 QUESTIONS AND/OR COMMENTS

CONTRACT NO. H 611-151-371  
 LOCATION/DISTRICT PUBLIC HEARING  
 MD 355  
 MD 27 TO MD 124  
 THURSDAY, OCTOBER 8, 1992 @ 7:30 P.M.  
 MARTIN LUTHER KING, JR. ELEMENTARY SCHOOL  
 PERS. NO. 153397

NAME JOHN V. BORDEN DATE 10-5-92

PLEASE PRINT ADDRESS 3815 Chanel Rd  
 CITY/TOWN Anndale STATE Va. ZIP CODE 22003

I/We wish to comment or inquire about the following aspects of this project:

I own 2 plus acres fronting on 355 above Seneca Park and adjacent the Middlebrook Inn. (see plat). I would appreciate information regarding the "take" by the Highway Adm. and the anticipated compensation.  
 I am also concerned about access to my property from the new highway.

Your prompt replay would be appreciated.

Sincerely,

*J. V. Borden*  
 John V. Borden, owner

Please add my/our name(s) to the Mailing List.\*

Please delete my/our name(s) from the Mailing List.

\*Persons who have received a copy of this brochure through the mail are already on the project Mailing List.



Maryland Department of Transportation  
 State Highway Administration

O. James Lighthizer  
 Secretary  
 Hal Kassoff  
 Administrator

Mr. John V. Borden  
 3815 Chanel Road  
 Anndale Va 22003

Dear Mr. Borden:

Thank you for your recent letter requesting information regarding the MD 355 project and how the proposed widening will affect your property. I have enclosed copies of the mapping that was on display at the October 8th Public Hearing for Alternate 2 (4 lanes divided) and Alternate 3 (6 lane divided). Your property is highlighted in yellow. The area between the existing and proposed right-of-way lines is what is proposed as needed for widening MD 355. Access to your property will not be affected by these improvements.

An actual take of your property will not be determined until the final design phase is underway. At that time, a Right-of-Way Agent from our District #3 Office of Real Estate will notify you. The design phase of this project is scheduled to begin in the Spring of 1993. To assist you in understanding the land acquisition process, I am sending you a booklet entitled, "Your Land And Your Highways Your Rights And Benefits".

If you have any further questions or comments, please feel free to contact the writer in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by: *W. J. Walton*  
 George W. Walton  
 Project Manager  
 Project Planning Division

LHE:GWW:ss  
 Enclosures

cc: Mr. Richard Ravenscroft (w/incoming)

My telephone number is \_\_\_\_\_

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COMMENTS

RESPONSES

STATE HIGHWAY ADMINISTRATION PROJECT  
QUESTIONS AND/OR COMMENTS DIVISION

CONTRACT NO. H 611-151-371  
LOCATION/DESIGN/PUBLIC HEARING  
MD 105  
RD 27 TO MD 124  
THURSDAY, OCTOBER 8, 1992 @ 7:30 P.M.  
MARTIN LUTHER KING, JR. THROBSPATE SCHOOL  
PONS NO. 153397

OCT 5 12 02 PM '92

NAME Ronnie M. Maxson, Jr. DATE 9-29-92

PLEASE PRINT ADDRESS PO Box 1622

CITY/TOWN Rockville STATE MD ZIP CODE 20849-1622

1/We wish to comment or inquire about the following aspects of this project:

please add my name to all project mailing  
lists for Montgomery + Frederick County  
projects.  
Thank you

Please add my/our name(s) to the Mailing List.

Please delete my/our name(s) from the Mailing List.

\*Persons who have received a copy of this brochure through the mail are already on the project Mailing List.



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

October 19, 1992

Mr. Ronnie M. Maxson, Jr.  
P.O. Box 1622  
Rockville MD 20849-1622

Dear Mr. Maxson:

Thank you for your recent request to be placed on all project mailing lists for Montgomery and Frederick Counties projects. Unfortunately, due to our procedures and primarily cost constraints, we do not place names on a county-wide project listing. In order to be placed on mailing lists, it must be done for each specific project for which you may have an interest. Therefore, I have placed your name on our MD 355 mailing list.

If you have any further questions or comments, please feel free to contact the writer in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by: George W. Walton  
George W. Walton  
Project Manager  
Project Planning Division

LHE:GWW:aa

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
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707 North Calvert St., Baltimore, Maryland 21203-0717

VI-26

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COMMENTS

RESPONSES

SENeca WHETSTONE  
 HOMEOWNERS ASSOCIATION, INC.  
 Post Office Box 3715 • Gaithersburg, MD. 20885

PROJECT PLANNING  
 Oct 2 10 14 AM '92

President  
 PETER SMITH  
 (301) 926-8242

Vice President  
 B.J. MOERSEN  
 (301) 330-5032

Secretary  
 AMY PIKE  
 (301) 253-9276

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 EILEEN LEFFLER  
 (301) 330-4193

Arch. Control  
 BOB RUDNICK  
 (301) 869-8328

JOE McCALLION  
 (301) 990-1455

ELLIE DARBY  
 (301) 963-9160

Mr. George Walton  
 Project Manager  
 Project Planning Division  
 P.O. Box 717  
 Baltimore, Maryland 21203-0717

Re: Md. Rt. 355 Study

On behalf of Seneca Whetstone Homeowners Association, which is located off of the intersection of Rt. 355 and Game Preserve Road, we, as an association have encouraged and supported the widening of Md. Rt. 355, due to the fact of traffic congestion and unsafe roads and intersections.

Over the past decades we have seen many accidents which have occurred resulting in both personal injury and loss of personal property. We have petitioned every other year the Md. State Highway Administration for a traffic signaling device; however, it has always been denied.

The key issues which our homeowners association will be concerned about are as follows:

1. A traffic signaling device to provide a safe means of entry and egress through this intersection.
2. A means of walking path (sidewalk) south of Game Preserve Road to Watkins Mill Road and north to Middlebrook Road.
3. Adequate guard rails between Md. Rt. 355 and sidewalk.
4. The alignment of Md. Rt. 355 to have fewer turns and more evenly distributed inclines. (Ex. - the steep incline and turns at Rt. 355 from Game Preserve Road north to Plummer Drive, and from Game Preserve Road south to Travis Road.

Seneca Whetstone Homeowners Association would like this information entered as a written statement in lieu of an oral presentation, at this time, until we have had the opportunity to view the proposed findings from the Md. Dept. of Transportation and the State Highway Admin. at October 9, 1992 meeting.

Sincerely,

*Paul E. Jacobson*  
 Paul E. Jacobson,  
 S.W.H.A. Past President



Maryland Department of Transportation  
 State Highway Administration

O. James Lighthizer  
 Secretary  
 Hal Kassoff  
 Administrator

October 19, 1992

Mr. Paul E. Jacobson  
 S.W.H.A. Past President  
 Seneca Whetstone  
 Homeowners Association, Inc.  
 Post Office Box 3715  
 Gaithersburg MD 20885

Dear Mr. Jacobson:

Thank you for your comments regarding our MD 355 project planning study. Your input in the planning process is both appreciated and encouraged.

Your comments will be considered as our decision making process continues and will be entered as part of our official records. We will keep you informed as the project progresses.

If you have any further questions or comments, please feel free to contact the writer in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by: *George W. Walton*  
 George W. Walton  
 Project Manager  
 Project Planning Division

LHE:GWW:ds

My telephone number is 410-333-1139

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 707 North Calvert St., Baltimore, Maryland 21203-0717

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COMMENTS

RESPONSES



KÖRNER ASSOCIATES

Jules G. Körner, RPA  
President

September 12, 1992

Mr. Neil Pederson, Director  
Office of Planning and Preliminary Engineering  
Maryland Department of Transportation  
State Highway Administration  
707 North Calvert Street, Room #401  
Baltimore, Maryland 21203-0717

RE: Changes to Route 335 from Route 124 to Middlebrook Road

Dear Mr. Pederson:

As a homeowner in the Fox Chapel development, which is along the above-referenced section of highway, I would like to register my opposition to the proposed widening of this arterial. I am fully aware that the State has the easements and that this project may have been in some earlier master plan. However, just because this widening may have been part of some plan does not mean that it is a fait accompli. This section of road services several communities that have been established for twenty years or longer. In addition, there are homes that predate these developments that have their sole egress directly onto Route 335. Therefore, I strongly urge you and your staff to consider the interrelated economic and safety impacts of the proposed road widening on this area.

**Economic Impacts.** Widening Route 335 will devalue adjacent residential property, in an already depressed real estate market, because of the difficulty of egress from their communities and increased noise levels. The widening will stimulate an increase in the number and size of vehicles, which in turn will increase the noise from this road. As the use of private vehicles increases, the use of public transportation decreases, which increases the public subsidy that this service requires or causes the service to be eliminated entirely. Decreasing the availability of public transportation adversely affects the economic welfare of those who rely on public transportation.

**Safety Impacts.** At the current level of traffic it is extremely difficult and dangerous for pedestrians to cross any portion of route 335 that does not have a traffic control device in order to reach a bus stop. Widening the road will encourage drivers to travel at higher rates of speed, which will make traversing this road even more

19217 Plummer Drive ♦ Germantown, MD 20876 ♦ (301) 972-2247



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

Mr. Jules Korner  
Korner Associates  
19217 Plummer Drive  
Germantown MD 20876

Dear Mr. Korner:

Thank you for your recent letter concerning our MD 335 project planning study. Citizen participation in our process is both encouraged and appreciated. Please be assured that your comments will be considered during the remainder of our study.

We have prepared an Environmental Assessment/Section 4(f) Evaluation document, which is on display at local libraries. This document details the findings of the study to date and elaborates on several of the topics that concern you.

One of your concerns is that the project will devalue property since the access to communities will be more difficult. Although the project proposes medians along MD 335, there will be median breaks to allow access to all communities and almost all state, county and local roadways that intersect MD 335. Further, we do not plan to deny any access to the future roadway. All driveways and entrances should remain as they exist today. However, with a median, some residences and business entrances will only be accessible via U-turns at the median breaks.

The project noise levels under the build will equal or exceed the Federal Highway Administration (FHWA) Noise Abatement Criteria (67dBA) or increase by 1 to 6.5 dBA over ambient noise levels at 16 of the 21 noise sensitive areas. Under the No-Build Alternate, noise level increases of up to 11 dBA are predicted at four, and up to 12 dBA at one, of the 21 noise sensitive areas. This is considered a significant increase according to FHWA criteria.

(410) 333-1110

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
303-7555 Baltimore Metro - 503-0431 D.C. Metro - 1-800-482-5002 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

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COMMENTS

RESPONSES

Pederson, SHA  
Sept. 12, 1992

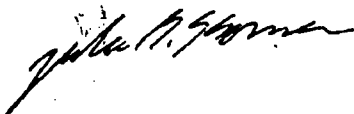
hazardous. As mentioned before, widening will also likely increase the number of vehicles on this road, which will further increase the danger of crossing.

As a resident of Fox Chapel for the past ten years, I have observed that the level of traffic on this section of route 355 has substantially decreased since the recent opening of the interchange with Interstate 270 on Middlebrook Road. Therefore, the traffic studies that were conducted prior to 1992 can no longer be valid, because they did not have any hard data as to the impact of this new interchange.

In addition, it would seem that with hundreds of millions of dollars being cut from the State budget, particularly from education, the tens of millions of dollars this widening will cost could be put to better use. Even if the money for this road project is coming from future budgets, the impact of the current budget reductions will have repercussions for those affected areas for years to come.

In summary, it appears to me that this widening project is one whose time has not come.

Sincerely,



VI-29

Mr. Jules Korner  
Page Two

The noise impacts of this project are based on the relationship of the projected noise levels to the FHWA noise abatement criteria are approached or exceeded or when the predicted noise levels are substantive or exceed the existing noise levels. SHA uses a 10 dBA increase to define a substantive noise increase. Noise abatement measures or mitigation will be evaluated in a latter portion of the study. I have enclosed the page from the environmental assessment for this study that illustrates the noise levels (Attachment #1).

You are correct in saying that the proposed improvements will attract traffic; however, traffic volumes will increase regardless of construction. I have provided you with the pages from the environmental assessment that show the projected traffic volumes for MD 355 (Attachment #2). I would also like to point out that there will not be a significant increase in trucks on this facility. Currently, trucks comprise about 4% of the traffic. This percentage is expected to remain constant under the projected conditions.

Along with the proposed roadway widening, we are proposing two alternative treatments both for pedestrians and bicyclists. The first is a five-foot sidewalk for pedestrians only. Bicycles would share the outermost roadway lane with vehicles. The second alternative is to provide an eight-foot hiker/biker trail. The goal is to have continuous sidewalks from MD 124 to MD 27.

The addition of sidewalks obviously does not affect the crossing situation you mentioned. It is preferred that pedestrians cross under the protection of traffic signals; however, where signals are not provided, pedestrians will still want to make the crossing movement. The benefit of having a dual roadway with a median is that a pedestrian only has to contend with vehicles approaching from one direction. The pedestrian can also use the median as a refuge or waiting area before completing the crossing movement.

I have also enclosed for your information the latest traffic counts at Middlebrook Road (Attachments #3 and #4). These numbers were developed after the opening of the middlebrook Road interchange with I-270. There is not a significant difference in the 1988 and the 1992 traffic volumes along MD 355; however, the 1992 numbers are 12-hour volumes. In order to make the numbers comparable, a 1.35 factor must be applied to increase the 12-hour count to a 24-hour volume. The number in red on the 1992 count shows the 24-hour number so you can compare these numbers to the 1988 numbers.

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COMMENTS

RESPONSES



KÖRNER ASSOCIATES

Jules G. Körner, RPA  
President

September 25, 1992

Mr. George Walton, Project Manager  
Project Planning Division  
Maryland Department of Transportation  
State Highway Administration  
P.O. Box 717  
Baltimore, Maryland 21203-0717

RE: Changes to Route 335 from Route 124 to Middlebrook Road

Dear Mr. Walton:

As a homeowner in the Fox Chapel development, which is along the above referenced section of highway, I would like to register my opposition to the proposed widening of this arterial. I am fully aware that the State has the easements and that this project may have been in some earlier master plan. However, just because this widening may have been part of some plan does not mean that it is a fait accompli. This section of road is service to several communities that have been established for twenty years or longer. In addition, there are homes that predate these developments which have their sole egress directly on to Route 355. Therefore, I strongly urge you and your staff to consider the interrelated economic and safety impacts that the proposed road widening will have in this area.

**Economic impacts.** Widening Route 355 will devalue adjacent residential property, in an already depressed real estate market, due to the difficulty of egress from individual homes and businesses. The widening will also stimulate an increase in the number and size of vehicles, which in turn will increase the noise from this road. As the use of private vehicles increases the use of public transportation decreases, which increases the public subsidy that this service requires or the service is eliminated, which adversely affects the economic welfare of those who rely on public transportation.

**Safety impacts.** At the current level of traffic it is extremely difficult and dangerous for pedestrians to cross any portion of route 355 that does not have a traffic control device in order to reach a bus stop. Widening the road will encourage drivers to travel at higher rates of speed, which will make traversing this road even more hazardous. As mentioned before, widening will also likely increase the number of vehicles on this road, which will further increase the danger of crossing.

Mr. Jules Körner  
Page Three

If you have any further questions or comments, please feel free to contact me or the project manager, Mr. George Walton. George can be reached in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

*Neil J. Pedersen*

Neil J. Pedersen, Director  
Office of Planning and  
Preliminary Engineering

Attachments

cc: Mr. Louis H. Ege, Jr.  
Mr. George Walton

VI-30

110

COMMENTS

RESPONSES

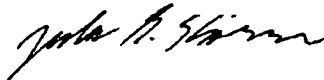
George Walton  
Sept. 25, 1992  
Page 2

As a resident of Fox Chapel for the past ten years, I have observed that the level of traffic on this section of route 355 has substantially decreased, since the recent opening of the interchange with Interstate 270 on Middlebrook Road. Therefore, the traffic studies that were conducted prior to 1992 can no longer be valid, because they did not have any hard data as to the impact on the traffic pattern that this new interchange would have.

In addition, it would seem that with hundreds of millions of dollars being cut from the State budget, particularly from Education, that the tens of millions of dollars this widening will cost could be put to better use. Even if the money for this road project is coming from future budgets the impact of the current budget reductions will have repercussions for those affected budget areas for years to come. Therefore, it would seem to me that this future project budget could be better spent in other areas like Education or illegal drug interdiction.

In summary, it appears to me that this widening project is one whose time has not come.

Sincerely,



VI-31

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COMMENTS

RESPONSES

URSA MAJOR Investment Partnership

P.O. Box 2885  
Gaithersburg, Maryland 20886-2885  
(301) 921-2570  
FAX (301) 840-5965

TTI Investment, Inc.  
Managing General Partner

CANIS MAJOR Limited Partnership  
General Partner

October 8, 1992

Mr. George W. Walton, Project Manager  
Project Planning Division  
MD State Highway Administration  
707 N. Calvert Street  
Baltimore, Maryland 20770

Re: MD Rt. 355 Reconstruction  
Contract No. M 611-151-371  
Location/Design Public Hearing

Dear Mr. Walton:

Upon reviewing the Environmental Impact Statement for the proposed widening of MD 355, we have noted that the proposed six lane section (Alternative 3) will adversely affect the operations of the North Gaithersburg Shopping Center and the adjacent office complex which are located on the east side on MD 355, opposite Professional Drive. At present, there is a traffic signal at this intersection permitting all turning movements from and to Professional Drive as well as the shopping center. Under the proposed widening scheme the intersection will be affected as follows:

Alternate 2

No adverse impact is apparent on the subject properties. All turning movement will be permitted as at present.

Alternate 3

It appears, from Figure III-12, that the southbound left turn lane has been inadvertently omitted which would prevent the southbound vehicles from turning left (eastbound) to the shopping center. With an opposing left turn lane and a traffic signal at that location we see no reason why the southbound left turn should not be provided. We request that it be included in this Alternate. With the inclusion of the southbound left turn lane, we would support the construction of Alternate 3 as shown on III-12.

Alternate 3

In Figure III-17 there is a continuous median shown along MD 355 through the subject area. It is not clear whether it is intended that no median breaks be included under this alternate or



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

October 21, 1992

Mr. Arie Mardiroseian  
URSA MAJOR Investment Partnership  
P.O. Box 2885  
Gaithersburg MD 20886-2885

Dear Mr. Mardiroseian:

Thank you for your comments regarding our MD 355 project planning study. Your input in the planning process is both appreciated and encouraged.

In your letter you expressed concern with the turning movements at the MD 355/Professional Drive intersection as shown in the Environmental Document (Figure III-12). Although our mapping did not show a left turn for southbound MD 355 turning left (eastbound) into the shopping center, we can provide that turning movement. We will revise our mapping to add this turning movement and include this as part of our recommendations for Alternate 3 (six lanes divided alternative).

You were also concerned with the mapping (Figure III-17) for Alternate 3 (six lane section) where it shows a continuous median along MD 355 through the subject area at Professional Drive. Median breaks will be provided at various locations for Alternate 3 (six lanes divided alternative) as shown in Figure III-7 through Figure III-14.

If you have any further questions or comments, please feel free to contact the writer in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

Louie H. Egs, Jr.  
Deputy Director  
Office of Planning and  
Preliminary Engineering

by:

*George W. Walton*  
George W. Walton  
Project Manager  
Project Planning Division

LHE:GNW:ss

cc: Mr. William J. Richardson

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 383-0451 D.C. Metro - 1-800-492-5662 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

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PROJECT DEVELOPMENT DIVISION  
Oct 13 1 59 PM '92

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COMMENTS

RESPONSES

**URSA MAJOR Investment Partnership**

P.O. Box 2885  
Galthersburg, Maryland 20886-2885  
(301) 921-2570  
FAX (301) 840-5965

TTT Investment, Inc.  
Managing General Partner

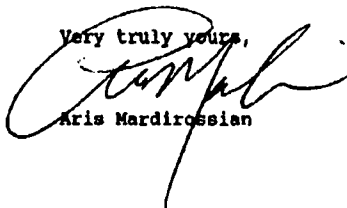
CANIS MAJOR Limited Partnership  
General Partner

Mr. George W. Walton, Project Manager  
Page Two  
October 6, 1992

whether they were inadvertently omitted in this Figure. We object to any alternate that would deny full access to the shopping center and the adjacent office buildings which are served by the driveway opposite Professional Drive.

We hope that the Maryland State Highway administration will note the above comments and amend its proposed plans to include full turning movements, in all directions, at the Professional Drive intersection.

Very truly yours,



Aris Mardirossian

cc: Senator Larry Levitan  
Senator Mary Boergers

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COMMENTS

RESPONSES

STATE HIGHWAY ADMINISTRATION  
QUESTIONS AND/OR COMMENTS

CONTRACT NO. B 611-151-171  
LOCATION/DESIGN PUBLIC HEARING  
NO 355  
MD 27 TO MD 124  
THURSDAY, OCTOBER 8, 1992 @ 7:30 P.M.  
HARVEY LOFTIS KING, JR. ELEMENTARY SCHOOL  
PHONE NO. 153397

NAME Mr. & Mrs. Wen C. Ko DATE 10/9/92

PLEASE PRINT ADDRESS 5415 Harwood Road

CITY/TOWN Bethesda STATE MD. ZIP CODE 20814

I/We wish to comment or inquire about the following aspects of this project:

*As German owners property owners, we favor:  
(1) Alternative #3; (2) Shift Great Seneca  
Park eastward to minimize the environ-  
mental impacts; and (3) lowest profile  
of the bridge on Seneca Stream.  
I thank you for your consideration.*

*Respectfully,  
Wen C. Ko*

Please add my/our name(s) to the Mailing List.\*

Please delete my/our name(s) from the Mailing List.

\*Persons who have received a copy of this brochure through the mail are already on the project Mailing List.



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

October 21, 1992

Mr. and Mrs. Wen C. Ko  
5415 Harwood Road  
Bethesda MD 20814

Dear Mr. and Mrs. Ko:

Thank you for your comments regarding our MD 355 project planning study. Your input in the planning process is both appreciated and encouraged.

Your comments will be considered as our decision making process continues and will be entered as part of our official records. We will keep you informed as the project progresses.

If you have any further questions or comments, please feel free to contact the writer in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by: *Walter J. Brodeur*  
George W. Walton  
Project Manager  
Project Planning Division

LHE:GWW:ee

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7556 Baltimore Metro - 563-0451 D.C. Metro - 1-800-492-5082 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

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COMMENTS

RESPONSES

VI-35

Per phone conversation.



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

October 30, 1992

Mr. Ken Gould  
Robert Management Inc.  
12250 Rockville Pike  
Suite 250  
Rockville MD 20852

Dear Mr. Gould:

As you requested in our October 27th telephone conversation, I am providing you with copies of mapping in the vicinity of Middlebrook Road. This is the same mapping that was presented at the October 8, 1992 MD 355 Location/Design Public Hearing. I hope this information is useful in answering your questions.

If you have any further questions or comments, please feel free to contact me in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by:

George W. Walton  
Project Manager  
Project Planning Division

LHE:GWW:as  
Attachment

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7858 Baltimore Metro - 585-8451 D.C. Metro - 1-800-482-5082 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

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COMMENTS

RESPONSES

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Per phone conversation.



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

October 30, 1992

Mr. Cherlee Pankey  
19926 Sweet Gum Circle  
Apt. 23  
Germantown MD 20874

Dear Mr. Pankey:

As you requested in our October 28th telephone conversation, I am providing you with copies of the MD 355 mapping in the Wexford area. This is the same mapping that was presented at the October 8, 1992 Location/Design Public Hearing. I hope it is useful in answering your questions.

If you have any further questions or comments, please feel free to contact me in Baltimore at (410) 333-1139 or toll free, in Maryland only, at 1-800-548-5026.

Very truly yours,

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

by:

George W. Walton  
Project Manager  
Project Planning Division

LHE:QWV:as  
Attachment

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 565-0451 D.C. Metro - 1-800-492-5082 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

file

COMMENTS

RESPONSES



Montgomery County Government

Position of  
Upcounty Citizens Advisory Board  
Location/Design for Maryland Route 355  
From MD. RTE. 27 to MD. RTE. 124  
October 8, 1992

The Upcounty Citizens Advisory Board supports the widening of MD 355 from MD 124 to MD 27. This improvement will address a transportation need long recognized not only in day-to-day congestion but in our master plans for Germantown and Gaithersburg. This project is also a logical extension of our recent comments in support of the widening of MD 27 from Damascus to Germantown and will clearly be necessary if Clarksburg is to become our next "Wedges and Corridor" community. It is clear that this project should receive the highest priority to add capacity in this transportation corridor.

The Board believes that Alternative 3, with 5-6 lanes, probably makes the most sense in light of the growth of traffic volumes we have experienced in the Upcounty. We appreciate your consideration of alternative Alignment Options and support protection of the Cider Barrel, a long term cultural resource to the Upcounty, as well as the proposed protection of the 53" diameter oak tree near Chapelgate Road. We take no position on the Bridge Options.

We urge that this project proceed as rapidly as possible. The widening of MD 355, the extension of MD 27 with the new interchange with I-270, and the reconstruction of MD 118, both east and WEST are all vital pieces to solve the transportation problem in the Germantown/Gaithersburg area.

Thank you for your efforts.

0145U

Upcounty Citizens Advisory Board

17900 Middlebrook Road, Germantown, Maryland 20874, 301/217-3400

No response necessary. This group commented during the public hearing. See comment 6. on page V-3.

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COMMENTS

RESPONSES

**LUKAS  
ASSOCIATES**

Transportation Planning and Engineering Consultants  
451 Hungerford Drive • Suite 302 • Rockville, Maryland 20850 • Tel. 301-340-9166 • Fax 301-340-0865

October 8, 1992

Mr. George W. Walton, Project Manager  
Project Planning Division  
MD State Highway Administration  
707 N. Calvert St.  
Baltimore, Maryland 20770

Re: MD Rt. 355 Reconstruction  
Contract No. M 611-151-371  
Location/Design Public Hearing

Dear Mr. Walton:

On behalf of Mr. William E. Cross, owner of the Cider Barrel Mobile Home Park, the Cider Barrel and the adjacent property at 20320 Frederick Road, I wish to submit the following comments and concerns in regard to the proposed reconstruction of MD 355.

1. The Affected Properties

- a) The references to "Cider Barrel Mobile Home Park" and the "Oak Crest Trailer Court" are reversed on the project planning drawings and in the Environmental Impact Statement. The "Cider Barrel Mobile Home Park" occupies the southwest quadrant of the intersection between relocated MD 118 and MD 355. Incorrect references to this property throughout the EIS as "Oak Crest Trailer Court" should be corrected to read "Cider Barrel Mobile Home Park"
- b) "The Cider Barrel Mobile Home Park" occupies about 17 acres and has permits for 120 mobile home sites. The land is zoned as R-60/TDR, with a recommended density of 15 units per acre. The potential development of the land would yield about 255 residential units. In addition the "Cider Barrel" site, about 1.5 acres, is zoned C-4 (Retail).

2. Site Access

- a) Full access to these properties will be denied from MD 355 by the elimination of the present driveway serving the site which has all turning movements permitted at MD 355. The proposed MD 355 widening project would construct a median which would restrict this driveway to only right turns entering and exiting the site. Such a driveway is inadequate to serve the needs of the current residents of the 120 mobile

No response necessary. Mr. Lukas commented during the public hearing. See comment 12. on page V-5.

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PA 8

COMMENTS

RESPONSES

**LUKAS  
ASSOCIATES**

Page 2  
Re: MD Rt. 355 Reconstruction

home sites who will be forced to make U-turns at the MD 355/MD 118 intersection when approaching the site from the south. Leaving the site to travel north on MD 355 will also require U-turns on MD 355. The difficulty of entering the site will be even greater when transporting the mobile homes or for emergency vehicles.

- b) The recently adopted Germantown Master Plan recommends that an access road be constructed, directly opposite Oxbridge Road to serve these properties.
- c) The driveway that is being constructed at that location, in connection with the MD 118 relocation project, does not align with Oxbridge Road and is being built with dangerously steep down grades. The mobile homes will not be able to use this driveway because of the steep grade. The driveway, as built, does not accommodate the needs of the current mobile home park and does not conform to the adopted Germantown Master Plan.
- d) In order to provide full access to the "Cider Barrel Mobile Home Park", the "Cider Barrel" and the adjacent property, it is requested that MD SHA construct a standard 36 ft. entrance driveway, opposite Oxbridge Drive, with proper grades which would accommodate emergency and other large vehicles. Such a driveway would serve the present needs of the mobile home park and the future needs of a 255 home community. A standard driveway aligning with Oxbridge Road would make traffic control at the intersection easier and safer. Left turn lanes are shown at this intersection for both southbound and northbound MD 355 traffic on the SHA MD 355 widening plans.

3. Noise Impacts

- a) Additional noise will be generated by the new six lane configuration of MD Rt. 355. The EIS report shows that at noise receptor locations M-8 and M-10, noise levels will increase more than 10 dBA above the ambient levels or exceed the FHWA Noise Abatement Criteria. This is a major concern, which has been previously identified by the Cider Barrel properties and previously reported to the State and County authorities.
- b) A noise study was undertaken several years ago on behalf of the Cider Barrel. That study demonstrated that the mobile home park will be adversely impacted by increased traffic associated with the relocation

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COMMENTS

RESPONSES

**LUKAS  
ASSOCIATES**

Page 3  
October 8, 1992  
Re: MD Rt. 355 Reconstruction

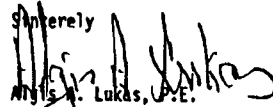
of MD Rt. 118 and the widening of MD Rt. 355.

- b) The Cider Barrel Mobile Home Park is a residential use and it is anticipated that the property will remain in that type of use for an indefinite period of time. That use will be jeopardized by the increased noise from relocated MD 118 and the proposed widening of MD 355. Appropriate steps should be taken to mitigate the MD 355 noise levels to bring them within acceptable norms as specified by FHWA standards.

For your information we are including the following attachments:

- 1. Germantown Master Plan (1989)
  - Zoning and highway plan
  - Land use plan
- 2. Minor Amendments to the Germantown Master Plan
  - Amendment 10, p.40 and p.41
- 3. Sketch of proposed location of driveway to serve the Cider Barrel properties.

We are hopeful that the Maryland State Highway Administration will note the above comments and concerns and will incorporate appropriate design features in its MD 355 widening plans to accommodate the present needs of the Cider Barrel Mobile Home Park and establish the proper conditions and environment for the future development of the properties as envisioned by the approved Germantown Master Plan.

Sincerely  
  
William E. Lukas, P.E.  
Principal

cc William E. Cross  
William J. Chen, Jr., Esq.  
Arthur B. Brisker, Esq.  
Thomas R. Brown  
Gwen Marcus, M-NCPPC

VI-40

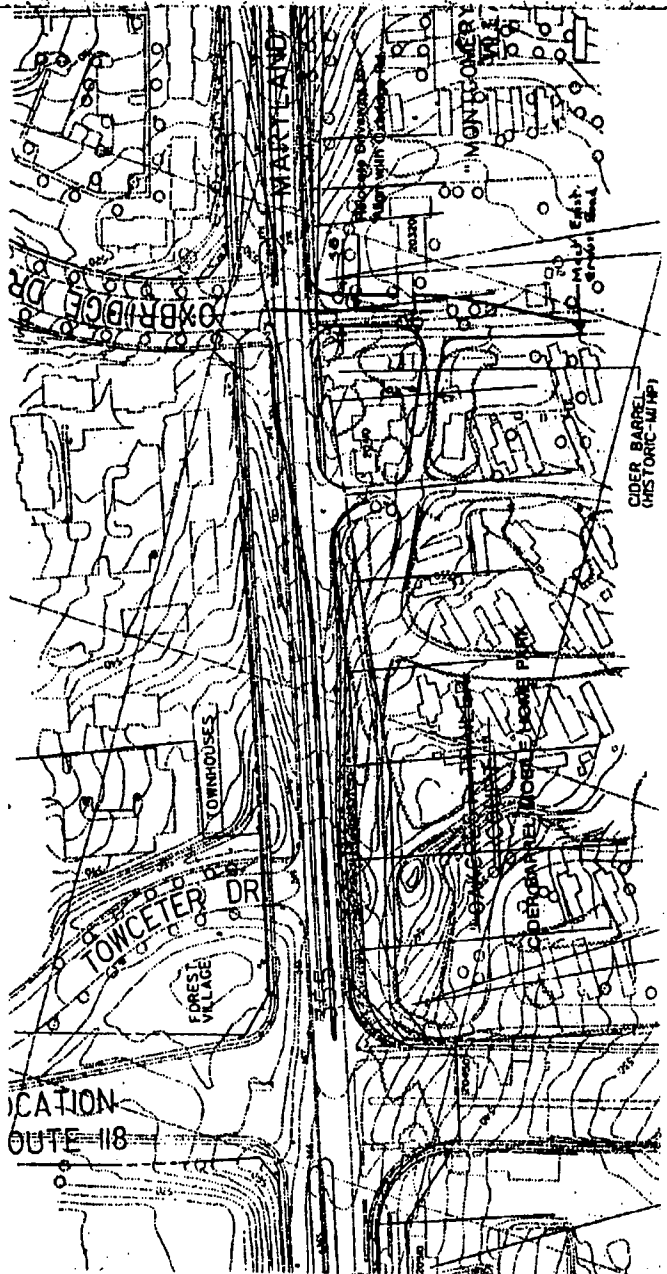
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COMMENTS

RESPONSES

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COMMENTS

RESPONSES

B:\MD355LD

10-8-92

MD Route 355 Location/Design Public Hearing Testimony  
(US Army Corps of Engineers Baltimore District Permit Application  
CENABOP\*RX(MD SHA - MD RT 355)92-00631-1)

I am Richard D. Wilder testifying for the Potomac Valley  
Environmental Group.

After years of testifying for improving existing roads  
instead of building environmentally destructive ones like the  
Germantown-Montgomery Village Connector (M-83), we are happy to  
learn that this project is now in the planning/design stage where  
it should have been a couple of years ago if the State and County  
had not pushed so hard to get M-83 constructed instead. A number  
of citizen and environmental activists and groups have shown that  
the monetary and environmental cost of constructing M-83 will far  
exceed that of improving MD 355 and have helped to get the MD 355  
project back on schedule.

We would like to present our list of preferred project  
alternatives based upon our analysis and consideration of traffic  
capacity, safety, business, residential and environmental  
impacts. These are as follows:

- \* 6 instead of 4 or 5 lanes to provide the desired traffic  
capacity. (Alternative 3).
- \* Long instead of the short bridge to impact less trees and  
wetlands even though the monetary cost will be more.
- \* Alignment shift to save the several hundred year old 53"  
diameter white oak just north of Chapelgate Rd.
- \* Bridge size 8 ft narrower than a corresponding typical  
section to reduce the projected area of impact for  
palustrine forested wetland area (W2).
- \* 40 mph instead of 50 mph design speed to reduce overall  
impacts throughout the design.
- \* East roadway alignment shift to protect the wooded  
wetlands on the west side within Seneca Creek State Park  
occupying the more intact floodplains forest which are of  
greater quality than the wetlands on the east side within  
Great Seneca Extension Valley Park, primarily occupying a  
riprap channel.

Thank you for giving us the opportunity to express our  
choice of alternatives for this much needed project.

*Richard D. Wilder*  
Richard D. Wilder

No response necessary. Mr. Wilder commented during  
the public hearing. See comment 9. on page V-4.

VI-42

**B. Agency Coordination**

**1. Letters**

COMMENTS

RESPONSES



SEP 25 1992

William Donald Schaefer  
Governor

Maryland Department of Natural Resources

Tidewater Administration  
Power Plant and Environmental Review Division  
Tawes State Office Building  
Annapolis, Maryland 21401

Torrey C. Brown, M.D.  
Secretary

Peter M. Dunbar, Ph.D., P.E.  
Director

September 23, 1992

Memorandum

To: Bob Miller, Water Resources Administration  
Dave Burke, Greenways and Resources Planning  
Janet McKeeg, Natural Heritage Program  
J. Rodney Little, Maryland Historical Trust  
RCD

From: Ray C. Dintaman, Jr., Chief, Project Review Program

Subject: NABOP 92-00631-1, MD SHA - MD Rt 355, Environmental  
Assessment/Section 4f Evaluation, Montgomery County

RECEIVED  
SEP 25 1992  
DNR

No response necessary.

Enclosed please find a public notice from the Army Corps of Engineers for the Phase I permit review for the above referenced project. This review constitutes the first phase of the NEPA/404 permit review process established by the Army Corps of Engineers and the State Highway Administration. The enclosed notice includes excerpts from the Environmental Assessment compiled for the MD 355 project. The full document is available from this office. Please review the submitted information and provide comments to this office by October 15, 1992. Your comments will be utilized for the development of the formal Departmental position on the project, including the selection of a preferred alternate.

If you have any questions regarding the review process or the proposed project, please contact Sean Smith of my staff at X-2788.

RCD:SMS  
Enclosure

Telephone: (410) 974-2788  
DNR TTY for the Deaf: 301-974-3683

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COMMENTS

RESPONSES



STATE OF MARYLAND  
DEPARTMENT OF THE ENVIRONMENT  
2500 Broening Highway Baltimore, Maryland 21224  
(301) 631-

PROJECT DEVELOPMENT  
DIVISION

William Donald Schaefer  
Governor

SEP 31 9 48 AM '92 Robert Perciasepe  
Secretary

September 23, 1992

Mr. George Walton  
Maryland State Highway Administration  
Office of Planning & Preliminary Engineering  
P.O. Box 717  
Baltimore, Maryland 21203

RE: Public Notice RX (MDSHA-MD Rt. 355) 92-00631-1  
WQC #92-WQ-0256

Dear Mr. Walton:

I have received and reviewed the above-referenced public notice from the U.S. Army Corps of Engineers. Based on the preliminary information provided in the public notice, the following comments are provided.

- 1. The alternatives which appear to leave the least impacts to water and wetlands are Alternate #2 4/5 Lane, High Bridge and 4 Lane, East Park and are, therefore, preferred. However, other issues, such as avoidance of private property, historical preservation and endangered species may be sufficient to justify some additional impacts to water and wetlands. If such justification exists, we will work with relevant parties to affect an acceptable compromise.
- 2. Once avoidance and minimization have been addressed and resolved, an acceptable mitigation plan shall be provided in accordance with the requirements of the Nontidal Wetland Division, Maryland Department of Natural Resources.
- 3. The proposed alignment must include an acceptable stormwater quality management plan which effectively treats the first one half inch of runoff from impervious surfaces prior to release into waters or wetlands.

Thank you for the opportunity to comment. If you have any questions, please contact me at 410/631-3609.

Sincerely,

*Andrew T. Der*  
Andrew T. Der  
Standards & Certification

ATD:lah  
cc: Paul Wettlaufer, Corps

VI-44

- 1. Wetland mitigation will be accomplished on the Hawkins site, a 30 acre property located approximately 4 miles east of the project. The mitigation plan complies with the requirements of the Nontidal Wetland Division, MD DNR. See Wetland Mitigation section of this document, on page III-4 and the Wetland Mitigation Coordination/Correspondence section, SHA letter dated 5/12/93 on page VI-107.
- 2. Stormwater runoff for the project will be managed in accordance with the State of Maryland Department of the Environment's "Stormwater Management Guidelines for State and Federal Projects".

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COMMENTS

RESPONSES



William Donald Schneider  
Governor

Jacqueline M. Rogers  
Secretary, DHCD

June 18, 1992

Office of Preservation Services

Ms. Cynthia D. Simpson  
Deputy Division Chief  
Project Planning Division  
State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21203-0717

RE: Contract No. M 611-101-171  
MD 355 from MD 27 to MD 124  
Montgomery County, Maryland

Dear Ms. Simpson:

Thank you for your letter, dated 28 May 1992 and received by the Trust on 3 June 1992, providing our office with a copy of the draft report on the Phase IB archeological survey SRA conducted for the above-referenced project.

The report presents a thorough description of the survey's goals, methodology, results and recommendations. The detailed maps of the study area greatly enhance the report's usefulness. The document is consistent with the standards of the "Guidelines for Archeological Investigations in Maryland."

The survey identified three new historic period archeological sites (18MO361, 18MO362 and 18MO363) within the project area, and the study confirmed the destruction of previously inventoried site 18MO179. All three newly identified sites represent the remains of rural farmsteads occupied from the late 19th through middle 20th centuries. The sites have all been disturbed by grading, erosion and/or plowing. The survey demonstrated that the sites do not have the potential to yield important information. Given the sites' lack of integrity and limited information potential, we concur that 18MO361, 18MO362 and 18MO363 are not eligible for inclusion in the National Register of Historic Places under Criterion D. Further archeological investigations are not warranted for this project.

No response necessary.

*Maryland*

Division of Historical and Cultural Programs  
Department of Housing and Community Development  
100 Community Plaza, Crownsville, Maryland 21032-2021 (410) 514-2688

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COMMENTS

RESPONSES

Ms. Cynthia D. Simpson  
June 18, 1992  
Page 2

We look forward to receiving a copy of the final report and completed NADB form, when available. If you have questions or require additional information, please call Ms. Elisabeth Hannold (for structures) or me (for archeology) at (410) 514-7631. Thank you for your cooperation.

Sincerely,



Elizabeth J. Cole  
Administrator, Archeological Services

EJC/EAN  
9201315

cc: Dr. Ira Beckerman  
Dr. Thomas F. King  
Mr. Mike Seabold

VI-46

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COMMENTS

RESPONSES



William Donald Schaefer  
Governor

Jacqueline H. Rogers  
Secretary, DHCD

August 20, 1992

Office of Preservation Services

Ms. Cynthia D. Simpson  
Deputy Division Chief  
Project Planning Division  
State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21203-0717

Re: Contract No. M 611-151-371  
MD 355 from MD 124 to MD 27  
Montgomery County, Maryland

Dear Ms. Simpson:

Thank you for your July 16, 1992 letter, received July 22, 1992, providing the additional information we had requested concerning the proposed undertaking as it relates to the Neelsville Presbyterian Church (M-19-5). Based on the information provided, we concur that the undertaking, which consists of a developer project, which is reviewed and coordinated by the State Highway Administration (SHA) through its Access Permits Division, and Alternates 1, 2 and 3 of SHA's MD 355 project planning study, will have no adverse effect on the Neelsville Presbyterian Church.

Should you have any questions or require additional information, please contact Ms. Elizabeth Hannold at (410) 514-7636.

Sincerely,

*Jo Ellen Freese*  
Jo Ellen Freese  
Administrator

Project Review and Compliance

JEF/EAH  
9202036

cc: Ms. Rita Suffness  
Dr. Ira Beckerman  
Dr. Thomas F. King  
Mr. Mike Seebold

*Maryland*

Division of Historical and Cultural Programs  
Department of Housing and Community Development  
100 Community Place, Crownsville, Maryland 21032-2023 (410) 514-7600

No response necessary.

VI-47

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COMMENTS

RESPONSES

MARYLAND  
HISTORICAL



TRUST

William Donald Schafer  
Governor

Jacqueline H. Rogers  
Secretary, DHCD

September 17, 1992

Office of Preservation Services

Ms. Abigail Hopkins, Acting Chief  
Special Projects Section  
U.S. Army Corps of Engineers  
Baltimore District  
P.O. Box 1715  
Baltimore, Maryland 21203-1715

Re: CENABOP-RX (MD SHA - MD 355)  
92-00631-1  
Montgomery County, Maryland

Dear Ms. Hopkins:

Thank you for your recent public notice, received by the Trust on 3 September 1992, requesting our comments on the above-referenced project.

The Maryland State Highway Administration (SHA) has been consulting with the Trust regarding the project's potential effects on historic properties. As noted in the enclosed correspondence (dated 18 June 1992 and 20 August 1992), the Trust concurs with SHA's determination that the proposed project will have no adverse effect on National Register eligible historic properties, including archeological sites and standing structures.

If you have questions or require additional information, please call Ms. Elizabeth Hannold (for structures) or me (for archeology) at (410) 514-7631. Thank you for providing us this opportunity to comment.

Sincerely,

Elizabeth J. Cole  
Administrator, Archeological Services

EJC/9202624

Enclosure

cc: Ms. Cynthia D. Simpson  
Dr. Thomas F. King  
Mr. Mike Seebold  
Ms. Gwen Marcus

Division of Historical and Cultural Programs  
Department of Housing and Community Development  
100 Community Place, Crownsville, Maryland 21032-2023 (410) 514-7600

No response necessary.

VI-48

be 1

COMMENTS

RESPONSES



William Donald Schaefer  
Governor

Maryland Department of Natural Resources

Tawes State Office Building  
Annapolis, Maryland 21401

Torrey C. Brown, M.D.  
Secretary

John R. Griffin  
Deputy Secretary

October 13, 1992

Mr Louis H. Ege  
Office of Planning and Preliminary Engineering  
State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21202

Re: Environmental Assessment/Section 4(f) Evaluation, MD Route 355 From MD 27 to MD 124 in Montgomery County, Maryland.

Dear Mr. Ege:

Thank you for the opportunity to review this document. Since our primary concern is impact to public parkland and open space, our comments will be limited to those issues. Since public parkland abuts both sides of existing Route 355 at the Seneca Creek crossing, it will not be possible to widen the roadway without converting parkland. Although the environmental document and the brochure prepared for the Location/Design Public Hearing present a bewildering array of acreages for various alternatives (varying due to differing combinations of design details and alignment shifts) we agree with the State Highway Administration that using retaining walls to reduce the conversion of parkland is unwarranted due to significantly increased project cost and aesthetic impact. The document also shows that construction of a 4-5 Lane roadway (Alternate 2) instead of a 6 lane roadway (Alternate 3) would slightly reduce the amount of parkland required. However, if, as the environmental document indicates, the 6 lane Alternate would provide increased safety and much better traffic service, its selection by SHA could be justified.

At this time, we feel that the most important decision to be made by SHA is the choice of a specific Alignment Shift Option, as described in the Section 4(f) Evaluation. The West Shift would move the widened roadway into Seneca Creek State Park (owned and managed by the State of Maryland), while the East Shift would move it into the Great Seneca Extension Stream Valley Park (owned and managed by the Maryland-National Capital Park and Planning Commission). Although the amount of parkland that would be required for the East Shift would be slightly greater under either Alternates 2 (4.11 verses 4.04 acres) or Alternate 3 (4.61 versus 4.38 acres), the environmental impact would be

Telephone: \_\_\_\_\_  
DNR TTY for the Deaf: 301-974-3683

No response necessary.

VI-49

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COMMENTS

RESPONSES

Ege, Louis H.  
October 13, 1992  
Page 2

greater. For instance, while the total acreage of parkland would be greater for the East Shift, the West Shift (see page V-9) would require more wetland of "greater quality and functional value", the floodplain on the west side is more intact, the forested habitat on that side is of higher quality, and the West Shift would result in the destruction of two residences. We should also note that parkland along the west side of the roadway was acquired with assistance from the U.S. Department of the Interior (DOI) through the Land and Water Conservation Fund, while the parkland along the east side was not.

Considering this, our recommendation is that the State Highway Administration select an East Shift Alternate, and make every reasonable effort to minimize impact to public parkland when future design stages are undertaken. Obviously, if the West Shift Option were to be selected, DOI would not necessarily agree with the previous comments made by DNR concerning the use of retaining walls and the choice of the roadway cross section

If you have any questions, please do not hesitate to contact me or Arnold Norden at (410) 974-3589.

Sincerely,



Gene F. Cheers  
Chief, Environmental Review and Evaluation

GFC:awn  
cc: Ray Dintaman, TWA  
Pat Haphey, Seneca Creek SP  
John Wilson, GRP

VI-50

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COMMENTS

RESPONSES



Maryland Department of Natural Resources

Resource Conservation Service  
Tawes State Office Building  
Annapolis, Maryland 21401

William Donald Schaefer  
Governor

Torrey C. Brown, M.D.  
Secretary

October 14, 1992

James W. Peck  
Assistant Secretary

Mr. Louis H. Ege, Jr.  
STATE HIGHWAY ADMINISTRATION  
707 North Calvert Street  
Baltimore, Maryland 21203-0717

Attn: Cynthia D. Simpson

RE: MD 355 from MD 27 to MD 124, Contract No. M 611-151-371

Dear Mr. Louis H. Ege, Jr.:

This is in response to your request for information regarding the above referenced project. This project was originally reviewed on August 16, 1988 and Cynthia Sibrel rechecked our data bases to see if there were any records of Federal or State threatened or endangered plant or wildlife species present in the proposed route, but nothing has been reported within this study area.

Sincerely,

*Janet McKegg*

Janet McKegg, Director  
Natural Heritage Program

JN:cbs

cc: Cynthia Sibrel  
Bob Miller  
Elder Ghigiarelli  
Ray Dintaman  
ER# 92.642/614

PROJECT  
DEVELOPMENT  
DIVISION  
Oct 19 2 28 PM '92

No response necessary.

(410) 974-2870

Telephone: \_\_\_\_\_  
DNR TTY for Deaf: 301-974-3683

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COMMENTS

RESPONSES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION III DEVELOPMENT DIVISION  
 841 Chestnut Building  
 Philadelphia, Pennsylvania 19107

OCT 27 11 20 AM '92

OCT 22 1992

Mr. Louis H. Ege, Jr.,  
 Deputy Director  
 Office of Planning and Preliminary Engineering  
 Maryland State Highway Administration  
 707 North Calvert Street  
 Baltimore, Maryland 21203-0717

RE: Maryland Route 355 Environmental Assessment (EA)/Section  
 4(f) Evaluation

Dear Mr. Ege:

In accordance with the National Environmental Policy Act (NEPA), as amended, section 309 of the Clean Air Act, and section 404 of the Clean Water Act, EPA is responding to your request for comments on the above referenced project.

Overall, the document provides a thorough analysis of the impacts and clear explanations of the concepts and assessment methods used. As a public information document, the content and clarity of this EA is exemplary. The following specific comments are provided for your consideration.

Environmentally Preferable Alternative

EPA recommends Alternative 2 or Alternative 2 (east alignment shift) as the environmentally preferable alternative because they propose to minimize adverse impacts to the environment. Alternative 2 also appears to be the wetland avoidance option. In addition, EPA recommends that a minimum 400' bridge be placed at the Great Seneca Creek crossing. The west alignment shift alternatives may impact additional wetlands and therefore are not recommended.

Carbon Monoxide Modeling

Carbon monoxide (CO) concentrations at the intersections affected by the project which have the greatest traffic volumes and poorest Level of Service (LOS) should be assessed using the CAL3QHC model or another acceptable model. Addressing the 5 or 6 worst case intersections should suffice. The CALINE 3 air dispersion model is acceptable for estimating ambient CO concentrations due to line sources such as highway segments, but it will underestimate concentrations in the vicinity of traffic congestion locations. Generally, the highest CO concentrations occur close to traffic congestion locations where significant traffic slowdowns or queuing occur.

Page 4 of the Air Quality Technical Report mentions the use of the CAL3QHC model, however, this statement contradicts the EA on page IV-31 which specifies the use of the CALINE 3 model.

1.

1. Caline 3 and Cal3QHC discrepancies have been corrected.

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COMMENTS

RESPONSES

Thank you for the opportunity to review and comment on this document. With consideration of the above comments, EPA will concur with the U.S. Army Corps of Engineers 404 (b)(1) guidelines analysis. However, further analysis of the wetland mitigation sites identified in the EA and further coordination with EPA on these sites is needed. If you have any questions regarding EPA's comments, please contact either Pete Stokely, of my staff, at 215-597-9922, or Peter Claggett at 215-597-0765.

Sincerely,



for Richard V. Pepino, Chief  
Environmental Assessment Branch

cc: P. Wettlauffer, U.S. Army Corps of Engineers, Baltimore District

2.

2. A wetland mitigation plan has been identified. See comment 1. on page VI-44.

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U.S. Department  
of Transportation  
Federal Highway  
Administration

# Memorandum

Subject: Maryland - Draft EA/4(f)  
MD Route 355: from MD 27 to MD 124  
Montgomery County  
FHWA-MD-EA-92-03-D

Date: September 17, 1992

From: Regional Environmental  
Protection Specialist

To: Baltimore, Maryland

Reply to  
Attn. of: HPP-03.4

Mr. A. Porter Barrows (HDA-MD)  
Division Administrator  
Baltimore, Maryland

Attached is a copy of the legal Memorandum of Review for your consideration in developing the final document for the subject project. It will be necessary to submit the final document to this office for legal sufficiency.

Upon selection of an alternate, the draft may be finalized by revision or attachment to reflect the commitments for the minimization of harm and the mitigation measures that will be carried out for this project.

*W. I. Hall, Jr.*  
W. I. Hall, Jr.

Attachment

See responses on following page.

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PROJECT  
DEVELOPMENT  
DIVISION  
SEP 23 1 54 PM '92

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COMMENTS

RESPONSES

Memorandum of Revision  
Environmental Assessment/Draft Section 4(f) Evaluation  
Maryland Route 355; Montgomery County, Maryland  
Report No. FHWA-MD-EA-92-03-D  
Reviewed as of September 13, 1992

We have reviewed the above-referenced Environmental Assessment/Draft Section 4(f) Evaluation for the upgrading of Maryland Route 355 (Frederick Road) between Maryland Routes 27 and 124 in Montgomery County, Maryland. There are two upgrading proposals, one to four/five lanes and one to six lanes.

The Environmental Assessment/Draft Section 4(f) Evaluation adequately discusses environmental impacts of this project. The Draft Section 4(f) Evaluation adequately describes the section 4(f) resources--Seneca Creek Park and Great Seneca Extension Stream Valley Park. The impacts of various design alternatives are discussed. However, sufficient information as to various design alternatives of crossing Great Seneca Creek (which would maximize minimization of harm to the park resources) is not provided in the draft. The final statement will have to provide sufficient information to demonstrate that the design/location alternate to be chosen, includes all possible mitigation and has the least impact on section 4(f) resources. Noise walls will have to be considered in reference to mitigation or lack of mitigation to park resources. The length and height of the crossing of Great Seneca Creek will have to be reviewed in detail with reference to planned park resources, possible park enhancements and aesthetic impacts to the parks. We are, therefore, unable at this juncture to find that the final document will be legally sufficient, and we will need to review the final document for legal sufficiency.

  
Francis J. Locke  
Regional Counsel

- 1.
- 2.
- 3.

- 1. Section III.C.4 of the Environmental Assessment (EA) includes information and descriptions of creek crossings. See Comment 1. under Montgomery Cty. letter of 12/2/92 on page VI-70.
- 2. The agencies reviewing the EA concluded that they did not want any unsightly and obtrusive noise or retaining walls in the park. See DNR letter on page VI-49.
- 3. The 320 foot bridge will improve the wildlife and recreation corridor within the park by allowing pedestrian and equestrian passage under a 13.5 foot clearance. The selected bridge length has been reduced from 400 feet, resulting in even less visual and physical impact to the park. Materials for the bridge abutments have yet to be decided.

VI-55

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COMMENTS

RESPONSES



DEPARTMENT OF THE ARMY  
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS  
P.O. BOX 1718  
BALTIMORE, MD 21203-1718

REPLY TO  
ATTENTION OF

OCT 28 1982

Operations Division

Subject: CENAB-OP-RX(MD SHA/MD RT 355, FROM MD 27 TO MD 124,  
#N611-101-371)92-00631

Maryland State Highway Administration  
Attn: Ms. Cynthia Simpson  
707 North Calvert Street  
Baltimore, MD 21203-0717

Dear Ms. Simpson:

I am replying to your application for a Department of the Army (DA) permit which you submitted in accordance with the procedure for merging NEPA and Section 404, for the subject project in Montgomery County, Maryland.

Enclosed is correspondence which this office received in connection with your application. In accordance with DA regulations and the procedure for merging NEPA and Section 404, this office provides applicants the opportunity to furnish proposed resolutions or rebuttals of all objections and comments received in response to the public notice. Therefore, in order for this office to continue with the evaluation of your application and to balance the concerns expressed for aquatic resources against the public need for the project, we request your analysis of these concerns.

In addition to the concerns expressed in the enclosed correspondence, the Corps has the following concerns:

- a. The Corps opposes the western alignment shift at Great Seneca Creek because it would maximize wetland and stream impacts as compared to the eastern shift and the straight alignment. There has not been sufficient information presented to date to conclude that the eastern shift is not practicable. The eastern shift is our preferred alignment since it minimizes wetland impacts. The eastern shift could also prove easier to construct than the straight alignment since it would allow traffic to continue using the existing facility during construction. If information is subsequently submitted to show that the eastern shift is not practicable, and the Corps concurs, thereby resulting in your selection of the straight alignment, we recommend that any required discharge of fill for a temporary roadway occur on the east side rather than the west side.

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b. The Corps is not opposed to construction of the six-lane facility as this may relieve the need for constructing additional roadway on new location (i.e., M-83). The analysis of intersection level of service (on page II-4) shows that the intersections operate better under the four-lane alternative than under the six-lane alternative. If SHA is leaning toward selecting the four-lane alternative based on the analysis of intersection congestion, we recommend that, prior to making a selection, SHA study the impacts of the improvements which would be needed to make the six-lane intersections operate at an adequate level of service. While these improvements may impact heavily on existing residences and businesses, the impacts to the natural environment would be much less if construction could be confined to the 355 corridor as opposed to constructing on new location in the M-83 corridor. This balancing of the people impacts of one corridor against the environmental impacts of an alternative corridor on new location is reminiscent of the decision process undertaken for the National Freeway project.

c. The Corps prefers selection of a longer bridge than exists today. In addition to eliminating the roadway flooding, a longer bridge could provide a wildlife corridor beneath the structure, enhancing not only wildlife, but recreation as well. A 400-foot structure is longer than is needed to accommodate wildlife passage, but an underclearance of only 8 feet may prove somewhat intimidating to deer. Therefore, if it would satisfy your hydraulic requirements, we recommend consideration of a shorter length structure (one that provides at least a 50-foot wide shelf for wildlife movement on each side of the stream) but with a greater vertical underclearance. This might also prove less expensive. If this results in an incremental increase in wetland impacts, we believe it could be justified in the interest of enhancing wildlife movement.

d. A statement in the next to last paragraph on page V-3 states that both the 100-foot and 400-foot bridge under Alternate 2 would provide adequate vertical clearance for bicycle or wildlife access. However, this fails to recognize that with Alternate 2, 100-foot bridge, the existing 2-lane bridge (which according to page V-5 forms a barrier to passage) would remain in place, thus negating any improvement in access beneath the bridge. Similarly, if an alternate is selected which calls for removing the existing bridge, but the existing embankment is left in place to limit downstream flood increases, any improvement in access under the bridge is again negated. The FONSI should document whether any existing barriers to access will remain in place as part of the selected alternate.

1.

1. The selected bridge is a 320 foot structure with a 13.5 foot clearance for pedestrian and equestrian passage. In addition the design includes a wildlife corridor with 140 to 150 feet between the bridge abutment and the creek on the east side and approximately 50 feet of clearance on the west side. The existing bridge spans the stream channel and banks with only a portion of the distance under water. Construction of a higher and longer bridge will allow greater vertical passage and retain horizontal passage with or without the existing embankment in-place.

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RESPONSES

-3-

e. We wish to conduct a site visit of the proposed mitigation sites. We question whether any County road improvements are proposed which might have a future impact on the proposed mitigation sites. We also question whether either of the two proposed sites currently has nature vegetation. The final document should address any potential environmental impacts of constructing the mitigation.

3.

f. In accordance with our August 12, 1992 letter commenting on the preliminary draft, the boundary of Wetland 1 must be added to Figures III-15, 16, 17, and 18.

4.

g. In accordance with our August 12, 1992 letter commenting on the preliminary draft, the area identified on Figure I-10 as an area subjected to flooding should be field checked for the presence of wetlands. Merely checking the NWI inventory will not give a reliable indication of the presence or absence of jurisdictional wetlands.

5.

h. If the existing riprap ditch located east of MD 355 should be impacted by the selected alternats, we recommend that the ditch be relocated, as opposed to piped, since the riprap provides velocity dissipation of this stormwater outfall.

6.

i. Please provide information as to the reported location of the unique plant Canadian Burnet so that we may take measures to ensure this area is protected from the impacts of construction.

7.

j. Please provide a copy of the public hearing transcript when it becomes available.

We will forward the correspondence from the other environmental agencies when it is received. If you have any questions, please contact Mr. Paul Wettlaufer of this office at (410) 962-1843.

Sincerely,

*Paul R. Wettlaufer*

*for* Keith A. Harris  
Acting Chief, Special Projects

Enclosures

85-1A  
VI-58

3. A wetland site has been selected, see comment 1. on page VI-44. No county road improvements are scheduled to affect the Hawkins site. A developer-built acceleration/decceleration lane will be built adjacent to the property. A 30 foot r.o.w. and an additional 50 feet for wild flowers (for a total of 80 feet) will separate the road from the Hawkins site.

4. The changes have been made.

5. In December, 1992, a field check was made of the subject flooding problem area; no wetlands or wetlands vegetation were present.

6. The existing rip rap ditch on the east side will be relocated as opposed to piped.

7. See EA Section IV.E.5.a. Canadian Burnett (*sanguisorba canadensis*) has not been verified in the field; its location is out of the project impact area. See letter dated 8/16/93 on page VI-81.

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COMMENTS

RESPONSES



United States Department of the Interior

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

L76(FWP-774)  
ER-92/0844

NOV 2 1992

Mr. A. Porter Barrow  
Division Administrator  
Federal Highway Administration  
711 East 45th Street, Suite 220  
Baltimore, Maryland 21211

Dear Mr. Barrow:

This is in response to the request for the Department of the Interior's comments on the supplemental draft environmental assessment/Section 4(f) evaluation for SR-355 (SR-27 to SR-124), Montgomery County, Maryland.

SECTION 4(f) STATEMENT COMMENTS

We concur that, if transportation objectives are to be achieved, there is no feasible and prudent alternative to the use of some park and recreation land with the alternatives under consideration.

We concur that the mitigation measures described are appropriate, and that coordination and consultation with the Maryland Department of Natural Resources (DNR) and the Maryland National Capital Park and Planning Commission (M-NCPPC) should continue in order to resolve the replacement of lands to be taken from either of the two parks for project purposes. The lands taken should be replaced with lands of reasonably equivalent park and recreation utility and location. The final Section 4(f) statement should reflect the results of that coordination.

We also concur with site-specific mitigation measures for the provision of a bikeway along MD 355, and a bridge design to allow for pedestrian/equestrian bikeway passage along the stream beneath the bridge. A measure worthy of consideration as part of the project, should access to Seneca Creek be needed, would be the provision of a canoe launching area in accordance with Section 147 of the Federal Highway Act of 1976 (Public Law 94-280). This possibility should be explored with DNR and M-NCPPC.

It appears from the document that there are no significant archaeological sites impacted by the project. However, we recommend continued coordination and consultation with the Maryland State Historic Preservation Officer in the event of the discovery of any unknown sites.

Wolter

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FBI - BALTIMORE	

\* ✓

VI-59

1. SHA has coordinated with M-NCPPC on parkland mitigation. A fee sample acquisition of the property has been arranged (see letter dated 4/20/93 on page VI-110).

2. A canoe launch site has not been considered for this project since there will be no changes to existing passive recreation uses in the parks. The project, however, does not preclude the launching of a canoe.

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COMMENTS

RESPONSES

SECTION 6(f) COMMENTS

As acknowledged in the draft, Seneca Creek State Park was provided financial assistance from the Land and Water Conservation Fund (LAWCF) and thus Section 6(f) of the LAWCF is applicable should the project use land from the Park. Discussions between the Maryland Department of Natural Resources and the National Park Service regarding the replacement of park land to be used for highway purposes should be initiated concerning replacement of the property acceptable to all concerned parties. The results of negotiations should be documented in the final statement. Please note that the National Park Service will consider a land replacement package under Section 6(f) only after a Section 4(f) approval by the Department of Transportation.

3.

ENVIRONMENTAL STATEMENT COMMENTS

Fish and Wildlife Resources

Three non-tidal wetlands will be impacted by the proposed highway construction alternatives. Wetland W1 is a forested wetland dominated by red maple (Acer rubrum) and a dense shrub layer of southern arrowwood (Viburnum dentatum). Jewelweed (Impatiens capensis) is the most common ground cover plant. This wetland is adjacent to Route 355 and provides several beneficial functions. These include: wildlife habitat, sediment capture, stormwater detention, toxicant retention, and nutrient removal and transformation.

Wetland W3 is separated into forested and emergent components. This wetland is adjacent to Route 355 and originates at a stormwater management outfall. This outfall is creating a severely eroding emergent wetland channel which is presently three to six feet deep and up to 40 feet wide. This erosion is alternately filling and scouring the downstream forested component of this wetland.

The emergent portion of wetland W3 is dominated by broad-leaf cattail (Typha latifolia) and sedges (Carex sp.). The forested portion of this wetland is dominated by red maple. Southern arrowwood is the major shrub species and common greenbrier (Smilax rotundifolia), the major ground cover. The emergent area is providing some habitat to wildlife, but erosion of this area is also causing substantial water quality problems. The forested area is trapping some sediments from the emergent area, providing habitat to wildlife, retaining toxicants and removing and transforming nutrients.

Wetland W2 encompasses a short reach of the Great Seneca Creek floodplain which is immediately upstream and downstream of the existing Route 355. This wetland system is classified as palustrine forested and riverine low perennial. The forested portion for this wetland system is dominated by red maple, sycamore (Platanus occidentalis) and green ash (Fraxinus pennsylvanica). Boxelder maple (Acer negundo) is the dominant species in the suppressed tree canopy layer. Scattered southern arrowwood and silky dogwood (Cornus amomum) are the major species in the sparse shrub layer. Wetland W2 provides the following high value functions: flood flow attenuation, groundwater recharge and discharge, sediment and toxicant retention, nutrient removal and transformation, food chain support, passive recreation opportunities and fish and wildlife habitat to a large diversity of species (Tables 1, 2, 3 and 4).

3.

There will be no encroachment into park property at Seneca Creek State Park and therefore Section 6(f) compliance is not required at this park location.

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COMMENTS

RESPONSES

Wetland W2 is a small part of the 6650 acres of forested uplands and wetlands and field habitat that extends along the length of Great Seneca Creek. This wetland is part of a habitat corridor for fish and wildlife populations both upstream and downstream of Route 355. An upgraded Route 355 would create a wider and more hazardous (increased speeds and vehicle usage) corridor crossing to terrestrial wildlife movement than the existing road. This project would increase wildlife mortality and could affect wildlife population levels in the vicinity of Route 355. In addition, traffic accidents could increase as a result of people hitting deer or trying to avoid deer and other wildlife.

It is recommended that Maryland State Highway Administration (SHA) provide at least 150 feet of horizontal corridor for wildlife (as measured between the top-of-slopes of the spill-through bridge protection structures) beneath the Great Seneca Creek Bridge. We are also requesting that SHA provide a minimum of 12 feet of vertical clearance (as measured from the top of the stream bank to the bottom of the bridge superstructure) to encourage deer passages under the bridge.

To minimize the impacts to wetland W2 and its associated floodplain, it is recommended that the new bridge and road embankment use the present crossing and road alignment and portions of the floodplain that are upstream of the existing bridge. The downstream segment of floodplain should be avoided because it would increase impacts to wetlands and to more frequently flooded forested upland. The downstream floodplain area provides some water quality benefits to Great Seneca Creek than the higher, narrower upstream segment of floodplain. Therefore, we request that the new alignment avoid the downstream floodplain.

The U.S. Fish and Wildlife Service recommends that SHA compensate for the unavoidable losses to the palustrine forested wetlands W1 and W2 at 2:1 ratio. The 2:1 replacement ratio for these forested wetlands will help compensate for the time lag of 40 to 50 years which is required for planted seedlings to grow into mature trees. This ratio also helps compensate for the risk associated with attempting to create forested wetlands. The creation of forested wetlands still remains an inexact science.

SHA is proposing to fill between 0.45 to 0.98 acres of wetland W3. This wetland is eroding badly due to the discharge of unmanaged stormwater from a concrete outfall. If SHA upgrades Route 355 it will increase the acreage of impervious surface which will increase the volume of stormwater. In addition, there will be less acreage of wetland W3 to detain this stormwater. More stormwater in fewer acres will only increase the erosion of wetland W3. It is recommended that SHA build a stormwater management pond below the concrete outfall to manage the stormwater flowing into this wetland. This stormwater management system will save the forested portion of wetland W3 and increase the quality of the water flowing out of this wetland.

FISH AND WILDLIFE COORDINATION ACT COMMENTS

The Fish and Wildlife Service is recommending denial of this permit until the following issues are resolved:

1. SHA selects a bridge length and height for crossing Great Seneca Creek that will facilitate wildlife movement along the floodplain.

4.

5.

6.

7.

8.

4.

5.

6.

7.

8.

See response 1. to Army Corps of Engineers letter dated 10/28/92 on page VI-58.

The selected build alternative includes an east shift over Great Seneca Creek which retains the existing stream crossing and puts the new structure on the upstream side of MD355.

A wetland mitigation plan has been identified (see comment 1. on page VI-44). Wetlands replacement is done on a 2:1 basis. See SHA response to the Sierra Club letter of 10/19/92 on page VI-19.

Stormwater management will be designed and sized during subsequent phases of design. There will be continuing coordination on stormwater management issues (see SHA letter dated 8/4/93 on page VI-114).

See response 4. above (ACOE letter 10/28/92 on page VI-57).

VI-61

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COMMENTS

RESPONSES

- 4
- 2. SHA selects an alignment that avoids the Great Seneca Creek floodplain that is downstream from the existing Route 355 bridge. | 9.
  - 3. SHA submits an acceptable preliminary mitigation plan for a wetland creation site that has been approved by the Service, Baltimore Corps of Engineers, Environmental Protection Agency and National Marine Fisheries Service. | 10.

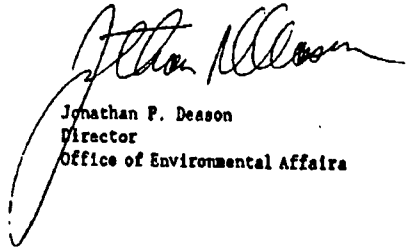
Once these issues are resolved, the Service will re-evaluate the 404 permit application, and most likely recommend no objection to issuance of a permit.

SUMMARY COMMENTS

The Department of the Interior offers no objection to Section 4(f) approval of Alternative 2, provided the measures mentioned above are included and documented in the final statement. | 11.

As this Department has a continuing interest in the project, we are willing to cooperate and coordinate with you on a technical assistance basis in further project evaluation and assessment. For matters pertaining to recreational and cultural matters, please contact the Regional Director, National Park Service, Mid-Atlantic Region, 143 South Third Street, Philadelphia, Pennsylvania 19106 (telephone (215) 597-7013). For matters dealing with fish and wildlife resources, please contact the U.S. Fish and Wildlife Service, Division of Ecological Services, 1825 Virginia Street, Annapolis, Maryland 21401, (telephone (410) 269-5448).

Sincerely,



Jonathan P. Deason  
 Director  
 Office of Environmental Affairs

cc:  
 Mr. Neil J. Pederson  
 Director, Office of Planning  
 and Preliminary Engineering  
 State Highway Administration  
 707 North Calvert Street, Room 506  
 Baltimore, Maryland 21202

Mr. Michael J. Nelson  
 Deputy Assistant Secretary, Public Lands  
 Department of Natural Resources  
 580 Taylor Ave  
 Tows State Building E3  
 Annapolis, Maryland 21401

- 9. See response 5. above.
- 10. A wetland mitigation plan has been identified. See comment 1. on page VI-44.
- 11. Alt. 2 was not the selected alternative. Please refer to the Section Section 4(f) evaluation on pages IV-1 to IV-7 for a full discussion on the selected alternative.

VI-62

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COMMENTS

RESPONSES



MARYLAND Office of Planning

PROJECT DEVELOPMENT DIVISION

SEP 22 4 13 PM '92

Ronald M. Knutner  
Director

William Donald Schafer  
Governor

September 17, 1992

Mr. Louis H. Ege  
Maryland Department of Transportation  
State Highway Administration  
707 North Calvert Street  
Baltimore, MD. 21202

Reply Due Date: October 15, 1992

State Application Identifier: MD920917-0877

State Clearinghouse Contact: Larry Fogelson

RE: Environmental Assessment/ Section 4(f)  
Evaluation - MD Route 355 From MD Route 27 to  
MD Route 124

No response necessary.

Dear Mr. Ege:

This is to acknowledge receipt of the referenced project. We have initiated the Maryland Intergovernmental Review and Coordination Process as of this date. You can expect to receive review comments and recommendations on or before the reply date indicated. If you have questions concerning this review, please contact the staff member noted above.

The State Application Identifier (SAI) must be placed on any financial assistance application form and used in future correspondence.

We are interested in the referenced project and will make every effort to ensure a prompt review. Thank you for your cooperation.

Sincerely,

Mary J. Abrams  
Chief, Maryland State Clearinghouse  
for Intergovernmental Assistance

MJA:LP:nds

cc: Fred Rappe - MDOT

VI-63

hh



COMMENTS

RESPONSES



MARYLAND Office of Planning

William Donald Schaefer  
Governor

Ronald M. Krebner  
Director

December 16, 1992

RECEIVED

JAN - 7 1993

PB - BALTIMORE

PROJECT  
DEVELOPMENT  
DIVISION  
DEC 28 3 11 PM '92

Mr. Louis H. Ege  
State Highway Administration  
Maryland Department of Transportation  
707 N. Calvert Street  
Baltimore, Maryland 21202

**SUBJECT: REVIEW AND RECOMMENDATION**  
State Application Identifier: MD920917-0877  
Description: Environmental Assessment/Section 4(f) Evaluation - MD Route 355 from MD Route 27 to MD Route 124  
Applicant: Maryland Department of Transportation/State Highway Administration  
Location: Montgomery County/City of Geithersburg  
Approving Authority: U.S. Department of Transportation/Federal Highway Administration  
Recommendation: Endorsement Subject to Comments

Dear Mr. Ege:

In accordance with Presidential Executive Order 12372 and Code of Maryland Regulation 14.26.04, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter constitutes the State process review and recommendation. This recommendation is valid for a period of three years from the date of this letter.

Review comments were requested from the Maryland Departments of Housing and Community Development including the Maryland Historical Trust, Natural Resources, Environment, and Economic and Employment Development, Metropolitan Washington Council of Governments, Maryland National Capital Parks and Planning Commission-Montgomery, Montgomery County, and the Maryland Office of Planning. All reviewers found this project to be consistent with their plans, programs, and objectives.

The Maryland Departments of Economic and Employment Development, Public Safety and Correctional Services, and Housing and Community Development including the Maryland Historical Trust, Maryland National Capital Parks and Planning Commission-Montgomery County, Montgomery County, and the Maryland Office of Planning found this project to be consistent with their plans, programs, and objectives.

The Maryland Departments of Natural Resources and Environment found this project to be generally consistent with their plans, programs, and objectives, but included certain qualifying comments.

Summary of Comments:

The Department of Natural Resources stated that "the above referenced environmental assessment is under review by the Department in conjunction with the newly established NEPA/404 phased permit review initiated by the State Highway Administration and Army Corps of Engineers. The Department of Natural Resources is reviewing this document pursuant to Section 307 (c) (3) (A) of the Federal Coastal Zone Management Act. As required by law, the Coastal Zone Consistency determination, when completed, will be forwarded to the Corps of Engineers and the State Highway Administration. A copy of this determination will be forwarded to the Office of Planning."

The Maryland Historical Trust has determined that the project has "no effect" on any known archaeological or historic resources and that State and/or federal requirements have been met.

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COMMENTS

RESPONSES

Mr. Louis H. Ege  
December 16, 1992  
Page 2

The Department of the Environment in their attached letter, addressed issues relating to stormwater management, soil erosion, debris, wetlands, waterways and air quality.

Montgomery County stated that information on floodplain management was not addressed in the report.

The Maryland National Capital Parks and Planning Commission-Montgomery County stated that alternative 3 is consistent with the Montgomery County Master Plan of Highways. They provided their attached testimony, from the October 8, 1992 public hearing on this project.

The City of Gaithersburg stated that they will forward their comments directly to the State Highway Administration at a later date.

Any statement of consideration given to the comments and recommendations should be submitted to the approving authority, with a copy to the State Clearinghouse. Additionally, the State Application Identifier Number must be placed on any correspondence pertaining to this project. The State Clearinghouse must be kept informed if the recommendation cannot be accommodated by the approving authority.

Please remember, you must comply with all applicable state and local laws and regulations. If you have any questions about the comments contained in this letter or how to proceed, please contact the State Clearinghouse at (410) 225-4490. Also please complete the attached form and return it to the State Clearinghouse as soon as the status of the project is known. This will ensure that our files are complete.

We appreciate your attention to the intergovernmental review process and look forward to your continued cooperation.

Sincerely,

Mary J. Abrams  
Chief, Maryland State Clearinghouse  
for Intergovernmental Assistance

Enclosures

MJA:LP:dx

- cc: Rappe-MDOT
- Hartman-DHCD/MHT
- Brown-MDE
- Rappe-MDOT
- Mack-MTGM
- Marrion-MNCPPC-MTGM
- English-OPC
- Shesfor-OPL
- Middleton-DEED
- Dunbar-DNR
- Bezanson-DPSCS
- Langford-MWCOG
- Russell-City of Gaithersburg

1. SHA will continue to preform hydraulic and hydrologic studies to address floodplain issues as they relate to the creek crossing.

VI-65

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COMMENTS

RESPONSES



December 1, 1992

Mr. Larry Fogelson  
Maryland Office of Planning  
301 W. Preston Street  
Baltimore, Maryland 21201

Dear Mr. Fogelson:

As I indicated to you previously by phone, the City of Gaithersburg staff is continuing to review the details associated with the Environmental Assessment/Section 4(f) Evaluation for Maryland Route 355 From Maryland Route 27 to Maryland Route 124. As a point of information, the two and a half week period originally allotted for the review would not have been sufficient for such a voluminous document. However, since the time has long since elapsed for a response to the State Clearinghouse, we intend to forward our detailed comments regarding the document directly to the State Highway Administration.

Thank you for your patience in this matter.

Sincerely,

Jennifer Russel  
Planning Director

JR/pw

No response necessary.

VI-66

City of Gaithersburg • 31 South Summit Avenue, Gaithersburg, Maryland 20877-2098  
City: 285-6300 • FAX: 301-948-6149

MAYOR  
W. Edward Baker, Jr.

BOUNCE MEMBERS  
Stanley A. Alder  
Edney A. Hite  
Gordon M. Kibbe  
Julius J. Peropetsky  
Mary E. Ward

CITY MANAGER  
Catherine W. Dohy

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COMMENTS

RESPONSES



October 21, 1992

Mr. Paul Wattleufer  
Corps of Engineers  
CENAB-OP-RK  
Post Office Box 1715  
Baltimore, MD 21203-1715

Dear Mr. Wattleufer:

RE: MD 355  
MD 27 to MD 124

Thank you for the opportunity to comment on the roadway alignment for Maryland 355 between Maryland 27 and 124.

In general, my organization supports improving existing rights-of-way as alternatives to building new highways. Specifically, we support the widening of MD 355 as less environmentally damaging than the proposed M-83.

We also ask that every step be taken to avoid or minimize impacts to the Great Seneca Creek watershed. We support long span bridges to reduce impacts on wetlands and flood plains. We also support shifting the roadway alignment to the east to avoid the wooded wetlands on the west within Seneca Creek State Park. Has a baseline study of the aquatic organisms in Great Seneca Creek been conducted so that some comparison could be made after road construction has been completed?

Two major concerns we have are how stormwater management for the widened road surface will be achieved and where mitigation sites that provide the same wetland function are located.

We question the assertion, made at the public hearing, that the proposed widening of MD 355 would have no impact on air quality. As you know, the Washington metropolitan area already exceeds the national ozone standard. Most of the ozone problem comes from vehicle emissions. Adding road capacity is not moving in the right direction.

Sincerely,

*Neal Fitzpatrick*

Neal Fitzpatrick  
Conservation Director

cc: Daphne Gemmill

A U D U B O N N A T U R A L I S T S O C I E T Y  
Regional • Independent  
8940 Jones Mill Road, Chevy Chase, Maryland 20815 • 301 652-9188 • Fax 301 951-7179

D-1012 (10/92)

VI-67

1.  
2.  
3.

1. A baseline aquatic study is not a requirement for an Environmental Assessment and therefore was not conducted. Best Management Practices (BMPs) and sound stormwater management will be implemented during construction to ensure that stream quality is not adversely affected.
2. See response 1. and 2. to Maryland Department of the Environment letter dated 9/23/92 on page VI-44.
3. By adding more lanes to MD355, traffic will flow easier and the number of cars queuing up, due to congestion will be diminished. Air quality, therefore, should not get any worse and may in fact improve due to increased traffic flow.

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COMMENTS

RESPONSES

Chief  
Maryland State Clearinghouse  
for Intergovernmental Assistance  
301 West Preston Street  
Baltimore, Maryland 21201-2365

Date: October 9, 1992

SUBJECT: REVIEW AND RECOMMENDATION

State Application Identifier: MD920917-0877

Applicant: Maryland Department of Transportation/State Highway Administration

Description: Environmental Assessment/ Section 4(f) Evaluation - MD Route 355  
From MD Route 27 to MD Route 124

Responses must be returned to the State Clearinghouse on or before October 12, 1992. Based on a review of the notification information provided, we have determined that:

Check One:

1. Consistent. It is consistent with our plans, programs and objectives.

(MHT only)  a. It has been determined that the project has "no effect" on any known archeological or historic resources and that requirements of Section 106 of the National Historic Preservation Act and 36 CFR 800 have been met.

(DNR only)  b. It has been determined that the requirements of Maryland Coastal Zone Management Program have been met for the project in accordance with 16 USC 1456, Section 307 (c) (1) and (2).

2. Consistent - Qualifying Comments. It is generally consistent with our plans, programs and objectives, but the attached qualifying comment is submitted for consideration.

3. Contingent Upon Certain Actions. It is generally consistent with our plans, programs and objectives contingent upon certain actions being taken as noted in the attached comment.

4. Not Consistent. It raises problems concerning compatibility with our plans, programs or objectives; or it may duplicate existing program activities, as indicated in the attached comment.

5. Additional Information Requested. Additional information is required to complete the review. The information needed is identified below. If an extension of the review period is requested, please check here .

Brief Comments: Montgomery County Master Plan of Highways identifies this highway as a major highway to be divided air lane facility. Alternative 7 was selected.

If additional comments are attached, please check here. Testimony

Signature: Robert M. Winick  
Name: Robert Winick  
Organization: M-NCPPC  
Address: 8787 Ge. Ave., Silver Spring, MD  
20910-3760

No response necessary.

VI-68

bhl



COMMENTS

RESPONSES

MONTGOMERY COUNTY DEPARTMENT OF TRANSPORTATION  
 COMMENTS ON THE MARYLAND ROUTE 355 (MD 27 to MD 124) PROJECT  
 INCLUDING ENVIRONMENTAL ASSESSMENT/SECTION 4 (f) EVALUATION  
AND THE LOCATION/DESIGN PUBLIC HEARING

1. MCDOT supports the implementation of Alternate J - the six lane divided roadway from MD 27 to MD 124 because it improves traffic service to acceptable levels for all roadway segments, and provides the master plan ultimate roadway now in one project, rather than necessitating additional disruption in the future with a widening project. We believe the continuity of a six lane facility with median for the entire project length (including locations where a wider, but undivided highway, may already exist such as from MD 118 to Middlebrook Road) is an important positive feature of this project. We recognize the need for selected reductions to the overall roadway section in locations such as in the vicinity of the Cider Barrel.
2. MCDOT prefers the "East Shift" alignment option in the vicinity of the Great Seneca Creek flood plain crossing, because it encroaches on less wetlands and flood plain than the "West Shift", and because it avoids taking right-of-way from the federally (Lead and Water Conservation Fund) and state (Program Open Space) funded Seneca Creek State Park.
3. Due to the potential negative impact on as many as ten additional residences, MCDOT does not feel the alignment options to avoid the 53" diameter White Oak located just north of Chapelgate Road are desirable.
4. MCDOT supports SHA's proposal to implement a reduced six lane roadway section so that there is no negative impact to the Cider Barrel site.
5. MCDOT prefers the high bridge 400 feet long span for the Great Seneca Creek crossing, but recognizes the need for additional hydraulic and hydrologic analyses to determine engineering feasibility of the different bridge options. This preference is based on our understanding that a higher bridge with wider span allows more light under it, thereby minimizing negative wetlands impacts, and because it allows more clearance to accommodate potential equestrians riding underneath.
6. There are several related roadway improvement projects currently under either construction or design which impact MD 355 directly within the MD 27 to MD 124 limits. A summary of the status of each project follows:
  - o MD 118 Relocated, Phase II is under construction and over 50% complete. Included in this project is an interim widening of MD 355 to a five lane undivided cross section from Collins Drive to the trailer park entrance driveway at the Cider Barrel.

1.

1. SHA conducted additional hydraulic and hydrologic studies which resulted in the recommendation to cross Great Seneca Creek using a 320 foot bridge with 13.5 feet of clearance.

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COMMENTS

RESPONSES

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- o MD 355 developer improvements are currently being designed from south of Brink Road to north of Middlebrook Road. When constructed this project would widen MD 355 to various cross sections, in the following segments:
    - transition from the existing two lane road to a four lane divided roadway from south of Brink Road to Ridge Road relocated;
    - a four lane divided roadway (with additional auxiliary or through lanes in various locations) from Ridge Road relocated to Oxbridge Drive, including the Ridge Road Relocated Intersection;
    - a five lane undivided roadway from Oxbridge Drive to north of Middlebrook Road.
  - o Watkins Mill Road Extended from MD 355 to MD 117 is being designed as a County project with final plans expected in early 1993. It envisions adding some turning lanes to MD 355 north and south of the Watkins Mill Road Intersection.
  - o Father Hurley Boulevard/Ridge Road Extended from MD 27 to Crystal Rock Drive. Although the actual intersection of this road with MD 355 will be constructed by the MD 355 developer improvements project listed above, construction of Ridge Road Extended on each side of the intersection will be done as a separate developer project slated to begin construction in the very near future.
  - o Germantown Montgomery Village Connector (M-83) from MD 27 to Montgomery Village Avenue. Essentially the only activity going on currently pertaining to this project is the completion of Grade Establishment Plans. No other work is programmed for this project at this time.
  - o Middlebrook Road Extended from MD 355 to M-83. This road will be constructed by developers in the future, and will impact the existing MD 355 roadway.
7. MCDOT supports the provision of a Class I bikeway (separate bike path) for the length of the project on the west side of MD 355. | 2.

2. An eight foot hiker/biker trail will be provided on the west side of MD355. This is consistent with the Montgomery County Comprehensive Plan and the portion of the roadway being improved by a developer. In addition, a five foot sidewalk will be built on the east side of the roadway.

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COMMENTS

RESPONSES

8. Other MCOOT concerns basically center around our desire to remain involved in the review process of detailed design plans as they progress for the MD 355 project. This includes our Traffic Engineering Division for striping, signing, and street lighting, our Transit Services Division for the location of bus stops and design consideration of bus stop pads (or passenger shelters if warranted), and the Planning and Project Development Office for pedestrian and bicycling issues.

3.

3.

There will be continued coordination between SHA and Montgomery County Department of Transportation.

MCOOT/OPPD  
December 1992

RWS/jmc  
8939U

VI-72

153

COMMENTS

RESPONSES

SIERRA

103 North Adams Street  
Rockville, MD 20850



CLUB

Montgomery County Group  
Phone 301 784-0666  
Please reply to:

James W. Clarke  
1916 Dundee Road  
Rockville, MD 20850

October 19, 1992

Mr. Paul Wettlauffer  
Corps of Engineers  
CENAB-OB-RX  
P.O. Box 1715  
Baltimore, MD 21203-1715

Dear Mr. Wettlauffer:

This letter is the Sierra Club comments on the Maryland State Highway Administration's request for a wetlands permit under Section 404 of the Clean Water Act and/or Section 10 of the River and Harbors Act 1899 to increase the capacity of Maryland 355 between MD 27 (Ridge Road) to MD 124 (Montgomery Village Avenue).

We agree that the project should be constructed on the east side of the existing bridge over Seneca Creek as the wetlands on the east side are of low quality.

One of our wetlands concern is with the migration proposal. We have not yet had an opportunity to visit the proposed mitigation sites but are troubled by the indications that wetlands will be "created" as part of the migration process. The business of wetlands creation is far ahead of the science of wetlands creation and we would feel much more comfortable if the migration sites proposed were degraded wetlands in the Seneca Creek watershed that could be restored.

We are also concerned with a statement that appears on page IV-21 in the Environmental Assessment/Section 4(f) evaluation report that says "Construction methods could include measures to control sediment and other run-off as these swales carry stormwater to an emergent wetland system reported to contain unique plants species approximately 700 feet to the west of the project boundary." We feel that the construction methods must include measures to protect this emergent wetlands system and look to the Corps to protect this wetland as part of its responsibility under Section 404 of the Clean Water Act.

Even though Seneca Creek is a class one stream there are indication that the water quality has improved and we would like to see

... To explore, enjoy, and protect the nation's scenic resources...

Printed with Soy-based Ink on 100% Recycled Paper (15% post-consumer)

See written response in Community Comments on pages VI-19 and VI-20.

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COMMENTS

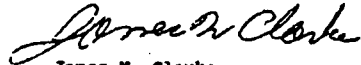
RESPONSES

monitoring required before, during and after construction to measure the impact on water quality and insure that the best management practices (BMPs) used are the ones that are best for this situation. We want to make sure that after the completion of the project there is no decline in water quality and we ask that the Corps do what it can to insure that there is no degradation of water quality in Seneca Creek.

I request that I be kept informed of the permit process for this wetlands permit at my address on Dundee Road as shown at the top of this letter.

Thank you for the opportunity to present our views on this project.

Sincerely,



James W. Clarke  
Conservation Chair  
Montgomery County Group  
Sierra Club

cc: Senator Laurence Levitan  
Delegates Gene Coughlin  
Richard LaVay  
Jean Roesser  
Mr. George Walton, SHA

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COMMENTS

RESPONSES



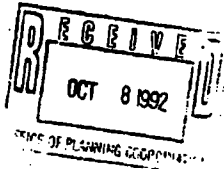
STATE OF MARYLAND  
DEPARTMENT OF THE ENVIRONMENT  
2500 Broening Highway Baltimore, Maryland 21224  
(410) 631- 3583

William Donald Schafer  
Governor

Robert Percinsepe  
Secretary

MEMORANDUM

TO: Susan Scotto  
THRU: J. L. Hearn *WV*  
Angelo Bianca *OB*  
Charlotte Holland *ch*  
FROM: Ray Anderson *ML (for REA)*  
SUBJECT: WMA Environmental Review Comments  
State Clearinghouse Project  
RE: State Application Identifier: MD 920917-0877  
DATE: October 1, 1992



.....  
This memo presents our comments on the Environmental Assessment Maryland Route 355 from Route 27 to Route 124.

When the site preparation, or the building-debris removal involves either construction (the placement of any outfall, pipe, riprap, or any other fill material) in an adjacent waterway or wetlands, a Section 404 Permit is required from the U.S. Army Corps of Engineers and a 401 Water Quality Certification is needed from the Maryland Department of the Environment. Section 404 of the Clean Water Act prohibits the discharge of dredged or fill material into waters of the U.S. without a permit from the Corps of Engineers.

Under Section 401 of the Clean Water Act, the State of Maryland is required to issue a Water Quality Certification for any federally permitted activity which may result in a discharge of dredged or fill material to State waters or wetlands. This Water Quality Certification confirms that the activity will not cause a violation of the State water quality standards or limitations.

Section 8-803 of the Natural Resources Article of the Annotated Code of Maryland requires that a person shall obtain a non-tidal waterway construction permit from the DNR for any construction in the 100 year floodplain which alters the course, current or cross-section of a stream or body of water within the State.

1.

1. All permits including Section 404, 401 Water Quality Certification will be applied for by SHA.

2.

2. A Section 8-803 permit for .07 acres of altered 100 year floodplain will be applied for by SHA.

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COMMENTS

RESPONSES

Ms. Susan Scotto - Memorandum  
Page 2 Identifier MD920917-0877

Please contact Mr. Keith Harris, Chief, River Basin Permits Section, Operations Division, U.S. Army Corps of Engineers at (410) 962-3477 for more details concerning the Section 404 permit. Mr. Andrew Der, Biologist, Standards, Regulations and Policy Development Section, Standards and Certification Division, Water Management Administration should be contacted at (410) 631-3609 for more details concerning the Section 401 Certification. Please contact Mr. Charles Wheeler, Director, Resource Protection Program, DNR at (410) 974-3877 for more information concerning the permits issued by them. One permit application must be filed with DNR to obtain all of these approvals.

REA:lp

VI-76

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COMMENTS

RESPONSES



STATE OF MARYLAND  
DEPARTMENT OF THE ENVIRONMENT  
2500 Broening Highway Baltimore, Maryland 21224  
(301) 631-

William Donald Schafer  
Governor

Robert Perciasepe  
Secretary

October 26, 1992

Ms. Mary J. Abrams  
Chief, Maryland State Clearinghouse  
for Intergovernmental Assistance  
301 W. Preston Street  
Baltimore MD 21201-2365

Dear Ms. Abrams:

RE: State Application Identifier: MD920917-0877.  
Environmental Assessment/Section 4(f) Evaluation-MD. Rte. 355 from  
MD. Rte. 27 to MD. Rte 124  
Montgomery County

Thank you for the opportunity to provide review of the above referenced Clearinghouse project. Copies of the documents were circulated throughout the Maryland Department of the Environment (MDE) for review, and the attached comments (pages 1-4) are offered for your consideration.

If you have any questions or need additional information, please call me or have a member of your staff contact, Mr. Nathaniel Brown, MDE's Clearinghouse Coordinator at (410) 631-3114.

Sincerely,

Susan Scott  
Director, Office of Strategic Planning and Policy

SS:nkb

Attachments

No response necessary.

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COMMENTS

RESPONSES

Ms. Mary J. Abrams  
Identifier# MD920917-0877

Additional Comments:

Construction and/or demolition of buildings and roadways must be performed in conformance with State regulations pertaining to "Particulate Matter from Materials Handling and Construction" (COMAR 26.11.06.03D)..... referencng that during any construction and/or demolition work, reasonable precaution must be taken to prevent particulate matter, such as fugitive dust, from becoming airborne.

1.

1.

Mitigation measures during construction will include minimizing furtive dust and particulates.

VI-78

15A

COMMENTS

RESPONSES



MARYLAND DEPARTMENT OF THE ENVIRONMENT  
2500 Broening Highway • Baltimore, Maryland 21224  
(410) 631-3000

JUN 22 5 10 AM '93

William Donald Schaefer  
Governor

Robert Perciasepe  
Secretary

June 16, 1993

Mr. Bruce Grey, Assistant Chief  
Project Planning Division  
State Highway Administration  
707 North Calvert St.  
Baltimore, Maryland 21203-0717

Attn: Ms. Barbara Allora-Bohlen

Dear Mr. Grey:

This is in response to your letter dated March 29, 1993 in reference to the property formerly occupied by Beahm's Auto Park along MD 355 between MD 124 and MD 27 in Montgomery Co. Enclosed with your letter was a report on a Preliminary Site Investigation (PSI) undertaken to determine the limits of contamination by hazardous materials. You requested our review of the report and comments as to the level of regulatory action that may be required.

The PSI describes contamination of limited extent presenting no significant risk to the public health or the surrounding environment. The report concludes that no action may be the preferred course of action. It also recommends further evaluations of the fate of the contaminants, and investigation of the potential human and environmental receptors. The soil gas survey recommended by your Office of Materials & Research may reveal other areas of contamination not detected by the monitoring well data included in the report. The results of these studies must be submitted before we can complete our assessment of the level of regulatory action required by the Hazardous Waste Program for this site.

The monitoring of the ground water should continue on a quarterly basis using the established procedures for collecting representative samples. This information will be helpful in the selection of the preferred remediation alternative. Copies of the results of the laboratory analyses of the groundwater samples should be transmitted to us for review as they become available.

1.

1. SHA will continue to monitor the wells according to MDE criteria. If remediation is required by MDE, SHA will make a determination during final design and/or make a permit request from MDE.

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COMMENTS

RESPONSES

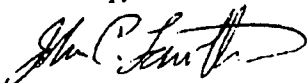
Mr. Bruce Grey  
Page 2

Other remediation alternatives should be evaluated by your consultant. For example, techniques such as sparging, soil vapor extraction and steam injection may be more suitable for the conditions at the MD355 site than the pump and treat alternative discussed in the report. It may prove desirable to combine several of these techniques in order to complete remediation within acceptable time and money constraints.

You should also be aware that this Department may have additional comments on this project, at a later date, through the 401 Water Quality Certification review process in conjunction with the U.S. Corps of Engineers wetlands permit. For further information concerning this process, you should call Mr. Andy Der of the Water Management Administration. His telephone number is (410) 631-3551.

Thank you for your efforts to address the environmental issues at this site. If you have any questions, please contact me at (410) 631-3343.

Sincerely,



John C. Lawther, Chief  
Groundwater Support  
Hazardous Waste Program

JCL:dif

cc: Mr. Richard Collins  
Mr. Andy Der

VI-80

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AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

June 15, 1993

RE: Contract No. M 611-151-371  
MD 355: MD 124 to MD 27  
Montgomery County, Maryland  
PDMS No. 153397

Mr. A. Porter Barrows  
Division Administrator  
Federal Highway Administration  
The Rotunde - Suite 220  
711 West 40th Street  
Baltimore MD 21211

Attn Mr. David Lawton

Dear Mr. Barrows:

In accordance with the combined environmental/regulatory process, the State Highway Administration (SHA) requests your concurrence on the Selected Alternate, Alternate J, for the MD 355 project. Enclosed is a copy of the mapping which shows the selected alternate.

At the April 21, 1993 Interagency Meeting, SHA requested concurrence on the Selected Alternate for this project. The attending agencies agreed that it is not necessary to obtain formal written concurrence on Purpose and Need or the Alternates Selected for Detailed Study for this project. It was their belief that the Environmental Assessment Section 4(f) Evaluation approved August 27, 1992, contained sufficient information to address the need for the project and that a reasonable range of alternates was considered.

My telephone number is (410) 333-1110

Teletypewriter for Impaired Hearing or Speech  
303-7555 Baltimore Metro - 866-0451 D.C. Metro - 1-800-482-5062 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

Mr. A. Porter Barrows  
Page Two

Please provide us with your concurrence with the Selected Alternates by July 15, 1993 and indicate such on the signature line below. Please return your response to Attn: Mr. Jeffrey H. Smith. Should you require additional information, please contact Mr. Bruce Grey at 333-1186.

Very truly yours,

Hal Kassoff  
Administrator

by:

*Neil J. Pedersen*

Neil J. Pedersen, Director  
Office of Planning and  
Preliminary Engineering

LHE:BMG:sjc  
Enclosure

cc: Ms. Jereene Barkdoll  
Mr. Louis H. Ege, Jr.  
Mr. Bruce Grey  
Mr. Jeffrey Smith  
Ms. Cynthia D. Simpson  
Mr. George Walton  
Mr. James Wynn

Concurrence:

*David P. Lawton*  
Federal Highway Administration

7-12-93

Date

VI-82

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AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

July 13, 1993

RE: Contract No. N 611-151-371  
MD 355: MD 124 to MD 27  
Montgomery County, Maryland  
PDMS No. 153397

Mr. Robert Gift  
Mid-Atlantic Regional Office  
National Park Service  
U.S. Customs House, Room 502  
2nd & Chestnut Streets  
Philadelphia PA 19116

Dear Mr. Gift:

In accordance with the combined environmental/regulatory process, the State Highway Administration (SHA) requests your concurrence on the Selected Alternate, Alternate 3, for the MD 355 project. According to the July 6th memorandum, this project was discussed with you by Mr. Jeffrey Knoedler as one of the exceptions that would be handled by your office.

Enclosed is a copy of the mapping which shows the selected alternate.

At the April 21, 1993 Interagency Meeting, SHA requested concurrence on the Selected Alternate for this project. The attending agencies agreed that it is not necessary to obtain formal written concurrence on Purpose and Need or the Alternates Selected for Detailed Study for this project. It was their belief that the Environmental Assessment Section 4(f) Evaluation approved August 27, 1992, contained sufficient information to address the need for the project and that a reasonable range of alternates was considered.

Jul 20 1993  
Office of Planning and Preliminary Engineering



My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 685-0451 D.C. Metro - 1-800-492-5052 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

Mr. Robert Gift  
Page Two

Please provide us with your concurrence with the Selected Alternate by September 10, 1993 or sooner and indicate such on the signature line below. Please return your response to Attn: Mr. Jeffrey H. Smith. Should you require additional information, please contact Mr. Bruce Gray at 333-1186.

Very truly yours,

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

by:   
Bruce M. Gray  
Assistant Division Chief  
Project Planning Division

LHE:BMG:sjc

Enclosure

cc: Ms. Jareana Barkdoll  
Mr. Louis H. Ege, Jr.  
Mr. Jeffrey H. Smith  
Ms. Cynthia D. Simpson  
Mr. Georgia Walton  
Mr. James Wynn

Concurrence:

National Park Service

7/21/93  
Date

SECTION 6(f) COMMENTS - MD 355: MD 124 TO MD 27

As acknowledged in the draft, Seneca Creek State Park was provided financial assistance from the Land and Water Conservation Fund (L&WCF) and thus Section 6(f) of the L&WCF is applicable should the project use land from the Park. Discussions between the Maryland Department of Natural Resources and the National Park Service regarding the replacement of park land to be used for highway purposes should be initiated concerning replacement of the property acceptable to all concerned parties. The results of negotiations should be documented in the final statement. Please note that the National Park Service will consider a land replacement package under Section 6(f) only after a Section 4(f) approval by the Department of Transportation.

VI-83

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AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Mal Kassoff  
Administrator

June 16, 1993

RE: Contract No. M 611-151-371  
MD 355: MD 124 to MD 27  
Montgomery County, Maryland  
PDMS No. 153397

Mr. Roy Denmark  
NEPA Compliance Section  
Environmental Protection Agency  
Region III  
841 Chestnut Avenue  
Philadelphia PA 19107

Dear Mr. Denmark:

In accordance with the combined environmental/regulatory process, the State Highway Administration (SHA) requests your concurrence on the Selected Alternate, Alternate 3, for the MD 355 project. Enclosed is a copy of the mapping which shows the selected alternate.

At the April 21, 1993 Interagency Meeting, SHA requested concurrence on the Selected Alternate for this project. The attending agencies agreed that it is not necessary to obtain formal written concurrence on Purpose and Need or the Alternates Selected for Detailed Study for this project. It was their belief that the Environmental Assessment Section 4(f) Evislution approved August 27, 1992, contained sufficient information to address the need for the project and that a reasonable range of alternates was considered.

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
303-7555 Baltimore Metro - 505-0481 D.C. Metro - 1-800-492-5082 Statewide Toll Free

Mr. Roy Denmark  
Page Two

Please provide us with your concurrence with the Selected Alternate by July 30, 1993 and indicate such on the signature line below. Please return your response to Attn: Mr. Jeffrey M. Smith. Should you require additional information, please contact Mr. Bruce Grey at 333-1186.

Very truly yours,

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

by: Bruce M. Grey  
Bruce M. Grey  
Assistant Division Chief  
Project Planning Division

LHE:BMG:sjc

Enclosure

cc: Ms. Jsreene Barkdoll  
Mr. Louis H. Ege, Jr.  
Mr. Jeffrey Smith  
Ms. Cynthia D. Simpson  
Mr. George Welton  
Mr. James Wynn

Concurrence:

U.S. Fish and Wildlife Service

Date \_\_\_\_\_

VI-84

105

AGENCY COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

PROJECT  
DEVELOPMENT  
AUG 10 1992  
JUL 28 1992

Mr. Louis Edge, Jr.  
Deputy Director  
Office of Planning and  
Preliminary Engineering  
State Highway Administration  
707 North Calvert St.  
Baltimore, Maryland 21203-0717

Re: MD 355 Selected Alternate  
Attn: Jeffery H. Smith

Dear Mr. Edge:

In accordance with the combined NEPA/404 process EPA has reviewed the referenced documentation on the selected alternate for MD 355 and offers the following comments and recommendations. Our comments will address the selected alternate and the documentation supporting the selection.

From the documentation provided with this concurrence request and that contained in the Environmental Assessment/Section 4(f) Evaluation dated August 27, 1992, EPA conditionally approves with the selected alternate, alternate 3. Alternate 3 meets the previously agreed upon purpose and need for the project without causing significantly more impacts to the natural environment when compared to the alternate 2. Alternate 2 does not meet the purpose and need. The selected alternate impacts 4.61 acres of parkland, 1.34 acres of wetlands and 1.90 acres of floodplain as compared to alternate 2 which has impacts of 4.11 acres, 1.21 acres and 1.52 acres respectively. Residential relocations are similar with five for alternate 3 and four for alternate 2.

EPA is providing conditional concurrence because, as per the NEPA/404 process, final mitigation sites are to be identified along with the selected alternate for concurrence. No sites have been identified in the concurrence request documentation. EPA will be happy to provide final concurrence on the selected alternate when a wetland mitigation site(s) has been agreed upon.

The concurrence on the selected alternate is the last concurrence point in the NEPA/404 process. Because of the long time interval for project development, EPA believes that each concurrence request should include summaries and conclusions from past concurrence points and coordination efforts. In this manner the documentation is a building block process with each concurrence building on the foundation laid by the previous

concurrence point.

For future projects (projects without existing environmental documents) EPA requests the following information be sent with the selected alternate concurrence request. A summary of purpose and need and its adoption date, the summary of impacts tables and alternates mapping, mitigation site locations and site information including any existing agreements on site acceptability by the resource agencies.

Thank you for this opportunity to comment. If you have any questions please do not hesitate to call Mr. Peter Stokely at 215-597-9922.

Sincerely,

*Peter M. Stokely for*  
John Forren, Acting Chief  
Wetlands Protection Section

VI-85

16/92

AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

June 16, 1993

RE: Contract No. M 611-151-371  
MD 355: MD 124 to MD 27  
Montgomery County, Maryland  
PDMS No. 153397

Mr. Keith Harris  
Special Projects Section  
U.S. Army Corps of Engineers  
P.O. Box 1715  
Baltimore MD 21201

Attn: Mr. Paul Wettlaufer

Dear Mr. Harris:

In accordance with the combined environmental/regulatory process, the State Highway Administration (SHA) requests your concurrence on the Selected Alternate, Alternate 3, for the MD 355 project. Enclosed is a copy of the mapping which shows the selected alternate.

At the April 21, 1993 Interagency Meeting, SHA requested concurrence on the Selected Alternate for this project. The attending agencies agreed that it is not necessary to obtain formal written concurrence on Purpose and Need or the Alternates Selected for Detailed Study for this project. It was their belief that the Environmental Assessment Section 4(f) Evaluation approved August 27, 1992, contained sufficient information to address the need for the project and that a reasonable range of alternates was considered.

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 565-0451 D.C. Metro - 1-800-492-5082 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

Mr. Keith Harris  
Page Two

Please provide us with your concurrence with the Selected Alternate by July 30, 1993 and indicate such on the signature line below. Please return your response to Attn: Mr. Jeffrey H. Smith. Should you require additional information, please contact Mr. Bruce Grey at 333-1186.

Very truly yours,

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

by: Bruce M. Grey  
Bruce M. Grey  
Assistant Division Chief  
Project Planning Division

LHE:BMG:sjc

Enclosure

cc: Ms. Jareene Barkdoll  
Mr. Louis H. Ege, Jr.  
Mr. Jeffrey H. Smith  
Ms. Cynthia D. Simpson  
Mr. George Walton  
Mr. James Wynn

Concurrence:

\_\_\_\_\_  
U.S. Army Corps of Engineers

\_\_\_\_\_  
Date

VI-86

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AGENCY COMMENTS



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

AUG 17 1993

Subject: CENAB-OP-RX(MD SHA/MD RT 355, FROM MD 27 TO MD 124,  
#M611-101-371)92-00631

Mr. George Walton  
Maryland State Highway Administration  
707 North Calvert Street  
Baltimore, MD 21203-0717

Dear Mr. Walton:

This is in reply to your June 16, 1993 request for our concurrence in Selected Alternate 3 with East Shift. We concur with the following understandings:

a. The Corps intends to issue a permit for this project based on the SHA's decision to construct a 320-foot bridge with 13-foot underclearance. If the dimensions of the bridge should be revised significantly during design, the Corps will likely require a full-blown public interest review (i.e., a protracted permit process) in Phase II.

b. The Corps concurs in the need to reduce the stormwater velocity which is eroding the channel of wetland W-3, and is amenable to providing some amount of mitigation credit for the construction of an impoundment to slow the discharge, and plantings to provide quality management. The amount of mitigation credit to be given will be decided at a later date, in consultation with DNR Nontidal Wetlands and the Corps. Corps approval to use the Hawkins mitigation site will be provided under separate cover, from our mitigation staff person.

c. The riprap channel on the east side of MD 355 in Great Seneca Extension Valley Park carries stormwater which is discharged at the head of this channel from a culvert under Game Preserve Road. When this outfall and channel are filled, the channel shall be relocated, rather than piped, so that there will be an opportunity to dissipate the velocity of the stormwater discharge before it reaches Great Seneca Creek.

If you have any questions, please call Mr. Paul Wettlaufer of this office at (410)962-1844.

Sincerely,

for Keith A. Harris  
Acting Chief, Special Projects  
Permit Section

VI-87

108



AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

MEMORANDUM

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

FROM: George Walton  
Assistant Division Chief  
Project Planning Division

DATE: August 16, 1993

SUBJECT: Contract No. M 611-151-371  
MD 355: MD 124 to MD 27  
PDMS No. 153397  
Concurrence on Selected Alternate

In accordance with the combined environmental/regulatory process, the State Highway Administration (SHA) requested U.S. Fish and Wildlife Service's concurrence on the Selected Alternate, Alternate 3, for the MD 355 project.

Mr. William Schultz was contacted on August 11, 1993 to provide SHA with his concurrence with Alternate 3 East Shift Option and he indicated his verbal concurrence.

by: Barbara Allera-Bohlen  
Barbara Allera-Bohlen  
Environmental Manager  
Project Planning Division

GW: BAB:dab

cc: Mr. William Schultz  
Mr. Jeffery Smith  
Mr. George Walton

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 Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

MEMORANDUM

TO: Ms. Linda A. Kelbaugh, Chief  
Environmental Programs Division

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

DATE: August 24, 1993

SUBJECT: Contract No. M 611-151-371  
MD 355, from MD 124 to MD 27  
Montgomery County, Maryland  
PDMS No. 153397

I am writing to clear up a misunderstanding about the U.S. Fish and Wildlife Service's (USFWS) comments on potential mitigation at wetland site W-3. I spoke with Mr. Bill Schultz of the USFWS about their comments on the wetland mitigation for this project.

The USFWS does support the construction of a SWM pond or rip-rap of the entire channel to slow the velocity of water currently eroding wetland W-3. They do not support the restoration of wetland W-3 without efforts to slow the velocity of water entering it.

If efforts to slow the velocity of water entering wetland W-3 are determined to not be feasible during the design phase than the USFWS recommends that all mitigation be done at the Hawkins wetland mitigation site.

by: Jeffery H. Smith  
Jeffery H. Smith, Assistant  
to Deputy Chief  
Project Planning Division

LHE/JHS/es

cc: Ms. Barbara Allera-Bohlen  
Mr. Stephen F. Drumm  
Mr. William Schultz  
Ms. Cynthia D. Simpson  
Mr. George Walton

My telephone number is \_\_\_\_\_

Maryland Relay Service for Impaired Hearing or Speech  
1-800-735-2258 Statewide Toll Free  
707 North Calvert Street, Baltimore, Maryland 21202

VI-88

169

AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

June 16, 1993

RE: Contract No. M 611-151-371  
MD 355: MD 124 to MD 27  
Montgomery County, Maryland  
PDMS No. 153397

Mr. James Noonan  
Maryland Office of Planning  
Office of the Director  
301 W. Preston Street  
Baltimore MD 21201

Attn: Ms. Christine Wells

Dear Mr. Noonan:

In accordance with the combined environmental/regulatory process, the State Highway Administration (SHA) requests your written comments on the Selected Alternate, Alternate 3, for the MD 355 project. Enclosed is a copy of the mapping which shows the selected alternate.

At the April 21, 1993 Interagency Meeting, SHA requested concurrence on the Selected Alternate for this project. The attending agencies agreed that it is not necessary to obtain formal written concurrence on Purpose and Need or the Alternates Selected for Detailed Study for this project. It was their belief that the Environmental Assessment Section 4(f) Evaluation approved August 27, 1992, contained sufficient information to address the need for the project and that a reasonable range of alternates was considered.

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 585-0451 D.C. Metro - 1-800-492-5082 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

Mr. James Noonan  
Page Two

Please provide us with your comments with the Selected Alternate by July 30, 1993 and indicate such on the signature line below. Please return your response to Attn: Mr. Jeffrey H. Smith. Should you require additional information, please contact Mr. Bruce Grey at 333-1186.

Very truly yours,

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

by: Bruce M. Grey  
Bruce M. Grey  
Assistant Division Chief  
Project Planning Division

LHE:BMG:sjc

Enclosure

cc: Ms. Jareene Barkdoll  
Mr. Louis H. Ege, Jr.  
Mr. Jeffrey H. Smith  
Ms. Cynthia D. Simpson  
Mr. George Walton  
Mr. James Wynn

VI-89

170

AGENCY COMMENTS



MARYLAND Office of Planning

DEVELOPMENT

JUL 26 12 11 1993

William Donald Schaefer  
Governor

Ronald M. Kuttner  
Director

Louis H. Ege, Jr.  
Deputy Director  
Office of Planning and  
Preliminary Engineering  
State Highway Administration  
707 North Calvert Street  
Baltimore, MD 21203-0717

Attn: Mr. Jeffrey H. Smith

Dear Mr. Ege:

The Maryland Office of Planning has reviewed the document Selected Alternate, Alternate 3, for the MD 355 project. The selected alternate is in keeping with our standards for managed growth and transportation. The information included to compare it to the "Alternates Considered But Not Selected" was sufficient. These are our comments on the selected alternate.

It is important to note that the selected alternate is consistent with local comprehensive plans. This project supports development within a designated growth area, the I-270 Corridor.

The higher and longer bridge included in the selected alternate has a clearance sufficient for a hiker/biker trail and an equestrian path. This is important in the effort to accommodate and encourage alternative transportation modes in all types of projects.

We are pleased to have this opportunity for comment on the Selected Alternate, Alternate 3, for the MD 355 project. Please contact us if you wish to discuss our comments in more detail.

Sincerely,

*James T. Noonan*  
James T. Noonan

JN\AMI\ami

cc: Gary Schlerf, OP

301 West Preston Street - Baltimore, Maryland 21201-2365  
Comprehensive Planning: (301) 225-4562 Fax: 225-4480 TTY: 383-7555



STATE OF MARYLAND  
DEPARTMENT OF THE ENVIRONMENT  
2500 Broening Highway Baltimore, Maryland 21224  
(301) 631-

William Donald Schaefer  
Governor

Robert Perciasepe  
Secretary

August 6, 1993

Mr. Louis H. Ege, Jr., Deputy Director  
Office of Planning and Preliminary Engineering  
Maryland Department of Transportation  
State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21203-0717

Attn.: Mr. Jeffery H. Smith

Re: Contract No. M 611-151-371  
MD 355: MD 124 to Md 27  
Montgomery County, Maryland  
PDMS No 153397

Dear Mr. Ege:

The Administration has received and Reviewed the June 21, 1993 transmittal for the above referenced project. The review, as requested, was limited to the Selected Alternate, Alternate 3, with the "east shift". The following comments are a result of that review:

Based upon the information presented, the Administration concurs with the east alignment shift in order to avoid and/or minimize impacts to wetlands. It is stated that the east alignment shift will impact 1.34 acres of wetlands. What would be the extent of wetlands impact with the west alignment shift?

The project will require stormwater management, quantity and quality, and erosion and sediment control.

The Administration appreciates the opportunity to provide comments on this Selected Alternate. If you have any questions regarding the above comments, please call.

Sincerely,

*James K. Tracy*  
James K. Tracy, P/E,  
Water Resources Engineer  
Water Management Administration

06-1A

111

AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

RECEIVED

JUN 22 1993

POWER PLANT &  
ENVIRONMENTAL REVIEW DIVISION

June 16, 1993

RE: Contract No. M 611-151-371  
MD 355: MD 124 to MD 27  
Montgomery County, Maryland  
PDMS No. 153397

Mr. Elder Ghigiarelli  
Maryland Department of Natural Resources  
Water Resources Administration  
Tawes State Office Building  
Annapolis MD 21401

Dear Mr. Ghigiarelli:

In accordance with the combined environmental/regulatory process, the State Highway Administration (SHA) requests your concurrence on the Selected Alternate, Alternate 3, for the MD 355 project. Enclosed is a copy of the mapping which shows the selected alternate.

At the April 21, 1993 Interagency Meeting, SHA requested concurrence on the Selected Alternate for this project. The attending agencies agreed that it is not necessary to obtain formal written concurrence on Purpose and Need or the Alternate Selected for Detailed Study for this project. It was their belief that the Environmental Assessment Section 4(f) Evaluation approved August 27, 1992, contained sufficient information to address the need for the project and that a reasonable range of alternates was considered.

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 565-0451 D.C. Metro - 1-800-492-5082 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

Mr. Elder Ghigiarelli  
Page Two

Please provide us with your concurrence with the Selected Alternate by July 30, 1993 and indicate such on the signature line below. Please return your response to Attn: Mr. Jeffrey H. Smith. Should you require additional information, please contact Mr. Bruce Grey at 333-1186.

Very truly yours,

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

by: Bruce M. Grey  
Bruce M. Grey  
Assistant Division Chief  
Project Planning

LHE:BMG:sjc  
Enclosure

cc: Ms. Jareene Barkdoll  
Mr. Louis H. Ege, Jr.  
Mr. Bruce Grey  
Mr. Jeffrey Smith  
Ms. Cynthia D. Simpson  
Mr. George Walton  
Mr. James Wynn

Concurrence:

Elder P. Ghigiarelli  
Maryland Department of Natural Resources

8/12/93  
Date

Note: 8/12/93 letter

VI-1A

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AGENCY COMMENTS



William Donald Schaefer  
Governor

Maryland Department of Natural Resources  
Water Resources Administration

Tawes State Office Building  
Annapolis, Maryland 21401

Torrey C. Brown, M.D.  
Secretary  
Robert D. Miller  
Director

"A Commitment to Excellence in Managing Maryland's Water Resources"  
August 12, 1993

Mr. Jeffrey Smith  
State Highway Administration  
707 North Calvert Street  
Baltimore, MD 21203-0717

RE: MD 355: MD 124 to MD 27, Montgomery County -  
Concurrence on Selected Alternate

Dear Mr. Smith:

The Department of Natural Resources (DNR) has reviewed the State Highway Administration (SHA) information package and associated request for concurrence on the selected alternate for the above referenced project. SHA has selected Alternate 3 (six lane) with an alignment shift to the east and a 320 foot bridge span at the Great Seneca Creek crossing.

During our review of the Environmental Assessment for this project, we recommended the adoption of Alternate 2 because it required the least impact to aquatic resources. This alternate was not selected because of its inability to meet the capacity demand in the design year (2015). The proposed six lane facility (Alt. 3) is to be a phased construction, with an initial construction of a four lane roadway and the provision of an expansion area in the median. Although the additional impacts (i.e., approximately 0.13 acre) associated with the construction of a six lane facility are not justified at this time, we agree to accept the alternative if the future expansion is inevitable in the near term. However, we note that most of the intersections along the study reach are estimated to have a lower level of service under Alternate 3 than Alternate 2. The ability of the reconstructed roadway to maintain adequate capacity under Alternate 3 appears questionable considering the low levels of service at the intersections. This issue should be addressed.

The proposed eastern shift in the alignment to minimize impacts to wetlands and parkland associated with Great Seneca Creek State Park is consistent with our previous recommendations. In addition, the 320 foot bridge over Great Seneca Creek now proposed

Telephone: (410) 974-2156  
DNR TTY for the Deaf: 301-974-3683

Mr. Jeffrey Smith  
August 12, 1993  
Page 2

was previously agreed to by DNR at the January 20, 1993, interagency meeting. However, we maintain our concerns regarding the amount of area under the structure which will actually be usable for wildlife passage. We request that SHA provide information for DNR's review on the amount of area left for passage under the structure after factoring out the spill-through abutments, piers, and scour protection, to ensure agreement on this issue.

If you have any questions, please contact me.

Sincerely,

Elder A. Ghigiali, Jr.  
Chief, Coastal Zone Consistency Unit

EAGJr:cma

cc: Sean Smith, TID  
Michele Huffman, WRA  
Paul Wettlaufer, USCOE

VI-92

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AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

*E SHH EOC/EAH*

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

*9301292*

June 16, 1993

RE: Contract No. M 611-151-371  
MD 355: MD 124 to MD 27  
Montgomery County, Maryland  
PDMS No.-153397

**RECEIVED**

JUN 18 1993

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

Dear Mr. Little:

In accordance with the combined environmental/regulatory process, the State Highway Administration (SHA) requests your written comments on the Selected Alternate, Alternate 3, for the MD 355 project. Enclosed is a copy of the mapping which shows the selected alternate.

At the April 21, 1993 Interagency Meeting, SHA requested concurrence on the Selected Alternate for this project. The attending agencies agreed that it is not necessary to obtain formal written concurrence on Purpose and Need or the Alternates Selected for Detailed Study for this project. It was their belief that the Environmental Assessment Section 4(f) Evaluation approved August 27, 1992, contained sufficient information to address the need for the project and that a reasonable range of alternates was considered.

*Section 156 completed 6/1/93  
ACMP concurred  
Anker - dia  
Shutro - H2na  
no need to object 6/28/93  
EAT 6/28/93*

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 565-8451 D.C. Metro - 1-800-492-6062 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

Mr. J. Rodney Little  
Page Two

Please provide us with your comments with the Selected Alternate by July 30, 1993 and indicate such on the signature line below. Please return your response to Attn: Mr. Jeffrey H. Smith. Should you require additional information, please contact Mr. Bruce Grey at 333-1186.

Very truly yours,

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

by: *B M Grey*  
Bruce M. Grey  
Assistant Division Chief  
Project Planning Division

LHE:BMG:sjc

Enclosure

cc: Ms. Jareene Barkdoll  
Mr. Louis H. Ege, Jr.  
Ms. Cynthia D. Simpson  
Mr. Jeffrey Smith  
Mr. George Walton  
Mr. James Wynn

No objection to the Selected Alternate

*Elyse J. Cole*  
State Historic Preservation Office

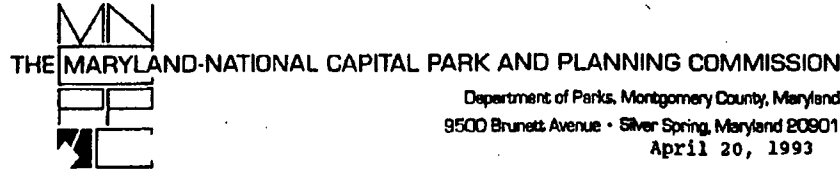
Date

*6/28/93*

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AGENCY COMMENTS



Mark Duvall, Group Leader  
 Environmental Planning Division  
 State Highway Administration  
 707 North Calvert Street  
 Baltimore, Maryland 21203-0717

Re: Contract No. M 611-151-371  
 MD 355 from MD 124 to MD 27 in  
 Montgomery County, Maryland

Dear Dave:

In response to your letter of April 7 regarding the above referenced matter, I am advising that the fee simple acquisition of County owned parkland as right-of-way required for this project will be acceptable to this Commission with the understanding that this taking will be kept to a minimum. While this Commission is not the fee simple owner of this property, we do have management and maintenance responsibility for it. Your direct inquiry to us in this regard is therefore very much appreciated.

You indicated in your letter that the District 3 Right-of-Way Office will be in contact with us and perform the appropriate property appraisals and deed preparations. Any communications in these regards should be made directly with George Mosburger in the Office of Property Acquisition for Montgomery County DOT. Mr. Mosburger will keep us informed along the way, solicit our comments on any issues that may arise and advise of all final determinations as they are made. The final conveyance of real property from the County to the State will have to be coordinated through his office.

Thank you for your working with us on this important road improvement project. If I can be of any further assistance, please do not hesitate giving me a call at (301) 650-2861.

Sincerely,  
*William E. Gries*  
 William E. Gries  
 Land Acquisition Specialist

WEG/bg  
 cc: George Mosburger

*Yonas for life*  
 \_\_\_\_\_  
 MONTGOMERY COUNTY PARKS

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**B. Agency Coordination**

**2. Meeting Minutes**



MEETING MINUTES

MEETING MINUTES



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

RECEIVED

DEC 18 1992

PARSONS BRINCKERHOFF  
BALTIMORE OFFICE

MEMORANDUM:

TO: Mr. Neil J. Pedersen, Director  
Office of Planning and  
Preliminary Engineering

FROM: Mr. Louis H. Egs, Jr.  
Deputy Director  
Office of Planning and  
Preliminary Engineering

DATE: December 14, 1992

SUBJECT: Pre-Recommendation Meeting Minutes  
MD 355 M 611-151-371 N  
from MD 27 to MD 124  
PDMS No. 153397

The Pre-Recommendation Meeting for the subject project was held Wednesday, December 2, 1992 in room 506A of the 707 N. Calvert Street Building, Baltimore, Maryland. Those in attendance were:

- |                           |                                   |
|---------------------------|-----------------------------------|
| Mr. Neil J. Pedersen      | Director, OPPE                    |
| Mr. Robert Olsen          | Chief Engineer                    |
| Mr. Creston Mills         | District Engineer, District #3    |
| Mr. Charlea Adams         | Director, OED                     |
| Mr. John Contestabile     | Chief, EAPD                       |
| Mr. Douglas Simmons       | Assistant Division Chief, PPD     |
| Mr. George Walton         | Project Manager, PPD              |
| Ms. Carmen Harria         | Project Engineer, PPD             |
| Ms. Wanda Brocato         | Project Engineer, PPD             |
| Mr. Bruce Grey            | Chief Environmental Planning, PPD |
| Ms. Barbara Allers-Bohlen | Environmental Manager, PPD        |
| Mr. Earl Schasfer         | Senior Engineer, HDD              |
| Mr. Ed Schatz             | Project Engineer, HDD             |
| Mr. Dan Uebersax          | Landscape Architect, OED          |
| Ms. Karen Coffman         | Landscape Architect, OED          |
| Ms. Susan Jacobs          | Highway Engineer, HDD             |
| Mr. John Logan            | Assistant Division Chief, BDD     |
| Mr. Andy Kosicki          | Assistant Division Chief, BDD     |
| Ms. Yelena Berenson       | Bridge Engineer, BDD              |
| Mr. Eric Tabacek          | Directors Staff, OTS              |
| Mr. Mike Jones            | Assistant Chief, District #3 R/W  |
| Mr. Robert Merryman       | Montgomery County DOT             |
| Mr. Bob Simpson           | Montgomery County DOT             |
| Mr. Dan Walsh             | M-NCPPC                           |
| Mr. Stephen Plano         | Parsons Brinckerhoff              |
| Mr. Romy Dels Cruz        | Parsons Brinckerhoff              |
| Mr. William Hellmann      | Rummel, Klapper & Kahl            |

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 568-0451 D.C. Metro - 1-800-492-5082 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

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The meeting began with Ms. Barbara Allers-Bohlen giving a brief overview of the environmental constraints associated with the study corridor. She briefly described the wetlands, parklands, historic sites and hazardous waste site. Following are the items that were discussed in detail:

♦ Tree Shift

Two alternatives were developed to avoid a 53" DBH White Oak tree just north of Chapel Gate Road. They consisted of shifting the alignment either east or west of the tree. By doing this up to 10 residential displacements would be required. The consensus reached was to take the tree to avoid residential displacements.

♦ Overlay between Watkins Mill Road and MD 124

If this area is not affected by the staged construction, then it was recommended to provide a slurry seal overlay and provide new lane markings. This may become a district project.

♦ Park Shift Alignments

Two alignment options were developed to avoid and/or minimize impacts to wetlands, parklands and a potential hazardous waste site in the vicinity of the Great Seneca Creek crossing. Parkland is located on both sides of MD 355 in the vicinity of Great Seneca Creek. County administered parkland is located on the east side and state administered parkland is on the west side of MD 355. Wetlands are also located on both sides MD 355. Those of higher quality are located on the west side. Through previous negotiations with environmental agencies and the county, the east shift is the preferred alignment.

A potential hazardous waste site, however, has been identified in the northeast quadrant of the MD 355/Great Seneca Creek crossing. Further investigations are ongoing to determine whether or not contamination is leaching into state owned park on the west side of MD 355. As part of this analysis, remediation measures, including cost, will be determined. A final recommendation on the alignment in the vicinity of Great Seneca Creek will be based on the results of these analyses.

♦ Typical Section

Several typical sections were developed during the course of the study. They were:

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**Mainline**

Alternative #2 four-lane divided in residential areas and five-lane closed in commercial areas\*

Alternative #3 six-lane divided, including widening of developer's portion\*

\* Note: Both build alternatives consist of 11' travel lanes with an additional 3' on the outside lane for bicycle compatibility.

**Backing**

Option #1 6' planting area, 5' sidewalk

Option #2 9' planting area, 5' sidewalk

Option #3 9' planting area, 8' hiker/biker trail

There were also three (3) stage construction options associated with Alternative #3 that were investigated. They included:

Option #1 Inside Widening construct a 4-lane divided closed section roadway initially; for ultimate, remove inside curb and add 5th and 6th lanes in the median

Option #2 Outside Widening construct a 4-lane divided closed median and open outside shoulders initially; add 5th and 6th lanes to outside and construct curb and gutter

Option #3 Inside widening construct a 4-lane divided open median and closed outside shoulders initially; add 5th and 6th lanes to median and construct curb and gutter

The team recommended Alternative #3, 6-lane divided facility, with Option #3 for stage construction. The limits of the stage construction will be revised to be between Watkins Mill Road and Middlebrook Road. No recommendation was made concerning the backing options. Additional studies will be done to determine if a hiker/biker trail can be included on the west side only for the section between Middlebrook Road

and MD 124. Also, sections will be developed in detail in areas of restricted right-of-way to determine the amount of planting area that is feasible.

♦ **Bridge Size**

Based on preliminary hydrological and hydraulic analyses, the size of the structure has been determined to be 320' long with a 13.5' under clearance. This size accommodates the various agency comments concerning under clearance for an equestrian underpass and opening width for a wildlife corridor.

Due to the location of the hazardous waste site, various options on the bridge typical section will be investigated to reduce impacts to the site. One option is to remove the sidewalk from the eastside through the park area. Also, other bridge sizes will be explored to minimize impacts to the site. M-NCPPC Parks Department representatives will be included in developing the information.

♦ **Retaining Walls**

Retaining walls were developed in several locations to reduce the number of relocations. Following are the locations and associated costs for the walls. The costs shown are for the walls only. The right-of-way cost to provide the sidewalk is not included. All walls are approximately 3 to 5 feet in visible height and are approximately 100 feet long.

Address	Wall Cost	R/W & Relocation Cost
19110 Frederick Road	\$59,000	\$160,000
19118 Frederick Road	\$0	\$210,000 **
19221 Frederick Road	\$30,000	\$190,000
11401 Millport Circle	\$37,000	\$190,000
20516 Frederick Road	\$35,000	\$230,000
20524 Frederick Road	\$35,000	\$170,000
20540 Frederick Road	\$53,000	\$190,000

\*\* Note: No wall is necessary to reduce impacts here. The reduction can be obtained by using a sideslope ratio of 2:1.

Retaining walls in the parks are not recommended by the environmental agencies due to the passive nature of the parks, the cost and the minor amount of land they would save.

♦ **Minor Amenities**

During the course of the project planning study, the project team met with several of the community groups in the corridor. Some of the key points from these meetings are:

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- Replace neighborhood signs if impacted
- Replace a wooden bus stop for the Middlebrook Mobile Home Park on east side of MD 355 just north of Scenery Drive
- Provide southbound left turn lane into businesses at Professional Drive

• Additional items for follow-up

- Determine when four lanes on MD 355 would not provide sufficient capacity
- Review bridge sizes with environmental agencies
- Review hazardous waste issues with environmental agencies
- Coordinate with MCDOT concerning bus stop locations
- Discuss easements and associated costs with District #3 Right-of-Way personnel
- Coordinate with M-NCPPC concerning streetscape elements in the Middlebrook vicinity; elements to include special lighting, pavers, street furniture, etc.

A follow up to this Pre-Recommendation Meeting will be scheduled to review information prior to the final recommendation. The Recommendation Meeting with the Administrator is being rescheduled for late January, 1993. You will be notified of the exact date as it becomes available.

These are the happenings as understood by the writer. If you have any additions or corrections, please contact me at (410) 333-1139.

by: George W. Walton  
George W. Walton  
Project Manager  
Project Planning Division

LHE:GWW:as  
Attachments

- cc: Attendees
- Mr. William Barkley
  - Ms. Mona Dave
  - Mr. John Schultz
  - Ms. Heidi VanLuven
  - Mr. Glenn Vaughan
  - Ms. Patricia Willard

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MARYLAND STATE HIGHWAY ADMINISTRATION

INTERAGENCY REVIEW MEETING

January 20, 1993

9:30 A.M.

State Highway Administration

211 E. Madison Street

Baltimore, Maryland 21202

Project Update: MD 355, Montgomery County  
Project Manager: George Walton  
Environmental Manager: Barbara Allera-Bohien

MR. GEORGE WALTON, SHA-PPD:

Stated that SHA is here to update a couple issues associated with the Great Seneca Crossing and the bridge lengths on the MD 355 project. Back at the time SHA had the Alternate Meeting which has been about two years ago, we had proposed that an original bridge crossing of 1200 feet in length and to span the creek and all it's associated floodplains. In subsequent Interagency Meetings, we had general discussions about what would be more appropriate as proposed alternatives for the Great Scenic Creek Crossing. SHA came up with two bridge lengths, one was the 100 foot structure which matches what exists today and the other was an approximate 400 foot bridge. SHA is the discussions here and with what work had been done through our hydraulics departments, that 400 seem to be a reasonable answer. At the time, SHA wanted to go back and do more H&H work to determine the length of the bridge. What we're here to talk about what we discovered as far as the H&H analysis at the structure.

At the time of the public hearing this past fall, SHA was still carrying a 400 foot bridge. SHA distributed our draft environmental assessment on the project stating the 400 foot bridge was the long "bridge length", and SHA received comments back from all the environmental agencies on that. The specific comments were focused on two major issues. One is bridge clearance as far as a vertical height there was discussion about whether we could provide equestrian/pedestrian trail underneath the bridge. The second major issue was the bridge vertical clearance, could we provide a wide enough under clearance for a wildlife passage. Now, one of the things associated with the wildlife passage, SHA was not completely sure what would have been an appropriate width.

What's shown on the top of map is the bridge structure and the underlying ground profile with that. On the top is the 400 foot bridge, on the bottom is the 320 foot bridge. Quickly, what we've done with our H & H work is we've come up and done the studies and the 320 foot bridge seems to be an adequate answer for the flow rates up underneath the bridge and what is necessary to handle the 100 year storm. We were originally talking 400 foot bridge width a plus or minus. SHA wanted to do the H & H work, we've done it, at least to this point and 320 foot bridge is the answer that we're coming up with. The two issues were vertical clearance, whether or not we could provide a hiker/biker pedestrian/equestrian underpass. With the 320 structure, there would be about 13 1/2 foot under clearance, which is adequate. The discussions previously, the heights were anywhere between 10 and 12 feet, so meet that requirement.

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The other concern was the wildlife corridor. On one particular side this area is approximately 140 to 150 feet between the abutment and the creek itself. On the other side, you have somewhere in the order of maybe 50 feet. So it seems there is adequate under clearance for both requirement that were somewhat mandated to us. That's the update.

COMMENT/QUESTION:

MR. BILL SCHULTZ, US FWS:

Asked if SHA is going to build a 320 foot bridge.

RESPONSE:

MR. GEORGE WALTON, SHA-PPD:

The 320' is probably the structure size. Where before we we're saying the 400 foot, we're going to just bring that down to 320 foot in 320 range. When they finalize the H & H work, let me point this out, 320' may change. But to the level of detail that we're at now, 320 foot seems to be a reasonable answer.

COMMENT/QUESTION:

MR. PETER CLAGGETT, EPA:

Asked what area under the bridge is within the hundred year floodplain.

RESPONSE:

MR. JOHN SCHULTZ, SHA HYDRAULICS:

The hundred year flood has not actually been established. We have some various hydrology models. SHA is using MNCPPC's study hundred year flow which is for ultimate run-off. The hundred year floodplain is actually wider than your picture, so the entire width of the bridge will be active flow in a hundred year flood. The difference here is the 400 foot bridge is about a foot a half lower than the 320 foot bridge, that's why we can get away with a narrower bridge. The water surface for this hundred year flood that we're using is essentially at the bottom of the 320 foot bridge and it's submerging the bottom of the 400 foot bridge.

COMMENT/QUESTION:

MR. SEAN SMITH, DNR:

Asked if that's because of the with the depth of the beams.

RESPONSE:

MR. JOHN SCHULTZ, SHA HYDRAULICS:

Responded yes. SHA started out with 12 foot under clearance design and that's what the 400 foot bridge represents, it just turns out that that's somewhat in the water. That's why we prefer the 320 foot bridge, it's a little higher, we get a little more than 12 foot under clearance, but we can make it smaller.

COMMENT/QUESTION:

MR. PAUL WETTLAUFER, A.C.O.E.:

Asked John if this result in zero increase in back water up to a foot.

RESPONSE:

MR. JOHN SCHULTZ, SHA HYDRAULICS:

This results in about a tenth of a foot of increase right at the structure. SHA would call it a tenth of an increase in the energy line. SHA looks strictly at the water surface at that location, the water surface actually goes down a little bit because you're constricting flow on a mild slope. Upstream a little ways, there is a water surface increase. It's less than a tenth of a foot, and that was what we're designing for. There's parkland upstream, SHA wanted to keep the water surface increase down so the water surface upstream is less than a tenth of a foot, it's about .07.

COMMENT/QUESTION:

MR. PAUL WETTLAUFER, A.C.O.E.:

Said the fact that the land use upstream is undeveloped, do you think there's going to be a push or an effort to reduce cost. Asked if there is going to be a push to go for the one foot waiver in back water increase.

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RESPONSE:

MR. JOHN SCHULTZ:

Said no, he didn't think so. The other concern SHA has in our hydraulic design is there's a tributary stream that enters about 500 feet upstream. It's Wetstone Run, which drains through Gaithersburg. It has a FEMA floodway associated with it and we don't want to impact that and get into all those difficulties. We are trying to keep that water surface increase less than a tenth of a foot. SHA understands that a large water surface increase would travel very far upstream. We'd have difficulty mitigating that. SHA is pretty well fixed on our allowable water surface increase and that's less than a tenth.

COMMENT/QUESTION:

MR. SEAN SMITH, DNR:

Asked if the 12 foot clearance is the maximum under the center of the water.

RESPONSE:

MR. GEORGE WALTON, SHA-PPD:

Basically it all through this area. It remains about to 12 foot just because the ground profile basically parallels with the bottom of the structure.

COMMENT/QUESTION:

MR. SEAN SMITH, DNR:

Asked if one side is about six foot.

RESPONSE:

MR. GEORGE WALTON, SHA-PPD:

Said yes.

COMMENT/QUESTION:

MR. SEAN SMITH, DNR:

Asked on the 320 foot bridge, what's the distance of that pier through to the stream bank.

RESPONSE:

MR. GEORGE WALTON, SHA-PPD:

Said it's about 16 feet.

COMMENT/QUESTION:

MR. PETER STOKELY, EPA:

Asked if both of these options completely span the wetland area.

RESPONSE:

MR. JOHN SCHULTZ:

Said they span the wetland areas associated with the stream channel. There is a side ditch type wetland associated with the existing roadway and we're impacting that because presently we're considering an alignment which is upstream from the existing roadway. So the new bridge fill will be impacting that side ditch and the difference between the 400 foot bridge and a 320 foot bridge is about .02 acres, the 320 impact is a little bit more. But it's a side ditch wetland, the impact.

COMMENT/QUESTION:

MR. PETER STOKELY, EPA:

Asked if the side ditch is where the increase of wetland impacts are.

RESPONSE:

MR. JOHN SCHULTZ:

Responded yes, that's correct.

RESPONSE:

MR. GEORGE WALTON, SHA-PPD:

Said there is one thing he did want to elaborate on regarding John's points is that the side ditch that is being called a wetland today it's a stone rip rap ditch.

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MEETING MINUTES

COMMENT/QUESTION:

MR. PETER STOKELY, EPA:

Asked what is the other wetland impact and besides that increase on these two and is there approach fills in wetland.

RESPONSE:

MS. BARBARA ALLERA-BOHLEN, SHA-PPD:

Said yes.

RESPONSE:

MR. PAUL WETTLAUFER, A.C.O.E.:

Said with either alternative the wetland impact is approximately the same.

COMMENT/QUESTION:

MR. PETER STOKELY, EPA:

Asked if the approach fill, is what has been shaded in.

RESPONSE:

MR. GEORGE WALTON, SHA-PPD:

Said yes.

COMMENT/QUESTION:

MR. PETER STOKELY, EPA:

Asked if the actual wetland is wider.

RESPONSE:

MR. GEORGE WALTON, SHA-PPD:

Said, yes. The way the wetlands are established is that the wetland is the channel itself. The wetlands here would basically be moved. So the way the wetlands come into the creek is they would build basically tucked down into it because of the nature of the topography in the area.

COMMENT/QUESTION:

MR. PAUL WETTLAUFER, A.C.O.E.:

Stated the Corps would propose then under this new process for merging NEPA/404 to issue a permit that spells out this bridge length with recognizing the possibility that it could fluctuate a little bit. Asked the other agencies if that is agreeable with everyone. We won't get into having to revisit the bridge length during final design.

RESPONSE:

MR. GREY, SHA - PPD:

Asked if that is agreeable to the other environmental agencies.

COMMENT/QUESTION:

MR. BILL SCHULTZ, US FWS:

A 320 foot bridge is sufficient for a wildlife corridor. We have no complaints with that. That's more than we even requested. USFWS is very happy with that and a 13 foot clearance is sufficient too.

COMMENT/QUESTION:

MR. GREY, SHA - PPD:

Asked if Sean Smith was agreeable.

MR. SEAN SMITH, DNR:

Said yes.

RESPONSE:

MR. GREY, SHA - PPD:

Asked if Michelle was agreeable.

COMMENT/QUESTION:

MS. MICHELLE HUFFMAN, MHT:

Said yes, as long as it'll carry the floods.

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MEETING MINUTES

MEETING MINUTES

RESPONSE:

MR. GREY, SHA - PPD:

Asked if Pete was agreeable.

COMMENT/QUESTION:

MR. PETER STOKELY, EPA:

Said yes. It appears from what you presented that 320 feet would be okay from the wetlands standpoint.

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MEETING MINUTES

MEETING MINUTES



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

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FEB 22 1993

MEMORANDUM:

TO: Mr. Neil J. Pedersen, Director  
Office of Planning and  
Preliminary Engineering

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

DATE: February 16, 1993

SUBJECT: M 611-151-371 (N)  
MD 355 from MD 27 to MD 124  
PDMS No. 153397

PB - BALTIMORE

A follow-up Pre-Recommendation Meeting for the subject project was held February 4, 1993. The purpose of the meeting was to provide additional information on certain portions of the project. The following were in attendance:

Neil Pedersen	Director, OPPE
Louia Ege	Deputy Director, OPPE
Cynthia Simpson	Deputy Division Chief, PPD
Joe Finkle	Assistant Division Chief, PPD
Bob Houst	Assistant Division Chief, PPD
Douglas Simmona	Assistant Division Chief, PPD
George Walton	Project Manager, PPD
Wanda Brocato	Project Engineer, PPD
Carman Harris	Project Engineer, PPD
Barbara Allera-Bohlen	Environmental Manager, PPD
Tate Jackson	Regional Planner, RIPP
Robert Dougless	Deputy Chief Engineer, Hwy Dev
Steve Drumm	Chief Highway Design, HDD
Ed Schatz	Project Engineer, HDD
John Contestabile	Chief, Access Permits
Greg Cooke	Engineer, Access Permits
Charles Adams	Chief, OED
Dan Uebersax	Landscape Architect, OED
Wendy Wolcott	Landscape Architect, OED
Glenn Vaughan	Project Engineer, BDD
Dilip Patel	Traffic Engineer, OOTS
Richard Ravenacraft	District Chief, Dist #3 R/W
Robert Merryman	Deputy Director, MCDOT
Robert Simpson	Planner, MCDOT
Dan Welsh	Planner, N-NCPPC
William Barkley	Parsons Brinckerhoff
Steve Plano	Parsons Brinckerhoff
Jim Zito	Rummel, Klapper & Kahl
Ernie Anderson	Greenhorne & O'Hara

My telephone number is \_\_\_\_\_

Teletypewriter for Impaired Hearing or Speech  
383-7556 Baltimore Metro - 565-0481 D.C. Metro - 1-800-492-5062 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

Mr. Neil J. Pedersen  
Page Two

Irene Mendoza Greenhorne & O'Hara

The meeting began with a brief overview of the previous Pre-Recommendation Meeting. Discussions then focused on the following topics:

- An alignment was developed that displays the location of the 8 foot hiker/biker trail on the west side of MD 355 and the 5 foot sidewalk on the east side. The impacts associated with the alignment were discussed, particularly the inclusion of retaining walls. Consideration needs to be given to the final alignment of the trail/sidewalk. The sharp angles displayed need to be reduced.
- Cost estimates were prepared that show the difference between initial stage construction and the ultimate construction.
- The preliminary hazardous waste information was reported. It was determined that the hazardous waste site was located on the east side only and that the source of contamination, an underground storage tank, was removed approximately 20 years ago. The early results demonstrate a low level of contamination; however, clean up efforts could still be required. This could consist of a pump system in which ground water would be filtered through charcoal in order to clean it. It could take about three years, or longer, before the site is considered clean. At this time, the approximate cost for clean up, which includes initial cost and a yearly operating cost, is \$1 million.

Based on the level of information prepared, it is feasible to move forward with the east shift through the Great Seneca Creek vicinity.

The next step in this investigation will be to finish data collection and analysis. Lab results from well samples are expected in the next week as well as the completion of the aquifer analysis. This is to be completed prior to the February 25th meeting with the Administrator.

These are the minutes as understood by the writer. If there are any additions or corrections, please contact me. I can be reached in Baltimore at (410) 333-1139.

by: George W. Walton  
George W. Walton  
Project Manager  
Project Planning Division

LHE:GMW:es  
cc: Attendees  
Mr. Creston Mills  
Mr. William Hellmann

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MEETING MINUTES

MARYLAND STATE HIGHWAY ADMINISTRATION

INTERAGENCY REVIEW MEETING

April 21, 1993

9:30 A.M.

State Highway Administration

211 E. Madison Street

Baltimore, Maryland 21202

INTERAGENCY REVIEW MEETING

APRIL 21, 1993

<u>NAME</u>	<u>AGENCY</u>	<u>PHONE #</u>
Barbara Allera-Bohlen	SHA-PPD	333-6745
Dennis Atkins	SHA-PPD	333-6748
Jerry Barkdoll	FHWA	962-4440
Carl Blalock	SHA-PPD	333-1138
Keith Blecher	SHA-PPD	333-1109
David Boellner	SHA-EPD	333-4169
Bill Branch	SHA-EPD	333-8063
Ann Catlin	FHWA	962-4440
Bob Cooper	DNR	974-3841
Art Coppola	A.C.O.E.	962-1843
Prakash Dave	SHA-Bridge Hydraulics	333-1164
Wayne Drury	SHA-PPD	333-1139
Mark Duvall	SHA-PPD	333-1175
Anne Eirays	SHA-PPD	333-6747
Thomas Folsie	SHA-PPD	333-1109
Michele Gomez	A.C.O.E.	962-1843
Bruce Grey	SHA-PPD	333-1186
Dan Guy	SHA-EPD	333-8429
Beth Hannold	MHT	514-7636
John Hayter	Greiner Engineers	561-0100
Jack Hett	SHA-EPD	333-8079
Scott Holcomb	SHA-PPD	333-1180
Michele Huffman	DNR-Tidewater	974-3841
Prasad Inmala	SHA-Bridge	333-1163
Victor Janata	SHA-PPD	333-1105
Howard Johnson	SHA-PPD	333-1179
Linda Kelbaugh	SHA-EPD	333-8078
Vaghan Lewis	SHA-PPD	333-1138
Ralph Manna	SHA-Bridge	333-2833
Chris Minick	SHA-Bridge Design	333-1156
John Nichols	NMFS	226-5771
Jim Noonan	MOP	225-4562
Leonard Podell	SHA-Bridge	333-8030
Suenette Pope	SHA-EPD	333-8717
Monte Rahman	SHA-PPD	333-6437
Sue Rajan	SHA-PPD	333-1138
Bill Schultz	US Fish & Wildlife	269-5448
John Schultz	SHA-Bridge Hydraulics	333-8029

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MEETING MINUTES

NAME	AGENCY	PHONE #
Douglas Simmons	SHA-PPD	333-1189
Cynthia Simpson	SHA-PPD	333-1177
Jeff Smith	SHA-PPD	333-8513
Sean Smith	DNR-Tidewater	874-2788
Alex Soutar	SHA-EPD	333-6413
Alan Straus	SHA-PPD	333-1190
Peter Stokely	EPA-Wetlands	(215) 597-9922
Karl Teikt	SHA-PPD	333-6437
Jane Wegner	SHA-EPD	333-4148
George Walton	SHA-PPD	333-1139
Paul Wettlaufer	A.C.O.E.	962-1843
Richard Woo	SHA-Bridge	333-3008

Maryland Route 355  
 Presentation Focus: Update & NEPA/404  
 Project Manager: George Walton, x1139  
 Environmental Manager: Barbara Allera-Bohlen, x6745

**MS. BARBARA ALLERA-BOHLEN, SHA-PPD:**

Stated that SHA wanted to update the agencies on the hazardous waste study for the site on the east side of Maryland 355 at Maryland National Capital Park and Planning Property.

The preliminary site investigation, that's the Phase 2 investigation of the hazardous waste study is completed and SHA has sent that to the Maryland Department of Environment and for their review. In the meantime SHA's Soils and Foundation people are looking at the report and recommended a gas survey, the results of which should be sent to MDE when it's available.

**MR. GEORGE WALTON, SHA-PPD:**

The alternate selection meeting with the Administrator was held. The Administrator selected what was called Alternative 3 which was the six-lane facility which ran all the way from Maryland 27 down to Maryland 124. However, due to financial constraints it would be a staged constructed facility where SHA would build the first four lanes of the six. SHA would build it in such a way that we would have a wide median and then at some future time provide the fifth and sixth lanes, there would be inside widening.

The other issues basically presented at the last Interagency Meeting were the bridge lengths and everyone concurred on the 320 foot bridge length, likewise the Administrator agreed to that and that was selected. The other issues associated with are the east and west park shifts. Excluding any discussion about the hazardous waste it's preferred to go with an east park shift but that's going to be dependent on what comes out of this final hazardous waste study and the final coordination with MDE.

**COMMENT/QUESTION:**

**MR. BILL SCHULTZ, US FWS:**

Asked if the hazardous site is up or down stream.

VI-1A

187

MEETING MINUTES

MEETING MINUTES

31

RESPONSE:

MR. GEORGE WALTON, SHA-PPD:

Replied upstream, in the county park. The other issue was we had identified during the course of the study a 53 inch diameter tree and SHA went through coordination on this and developed alternatives to avoid the tree. Either the east or west shift to avoid the tree the road would impact approximately 7 to 10 residences and through coordination SHA decided to not take the residences but to go ahead and impact the 53 inch tree.

MS. BARBARA ALLERA-BOHLEN, SHA-PPD:

Stated that Maryland 355 is one of these pipeline projects as far as the NEPA/404 process. SHA wants to know if it is acceptable to proceed on just getting concurrence on the selected alternate and bypass purpose and need and alternates for detailed study concurrence.

COMMENT/QUESTION:

MR. BILL SCHULTZ, US FWS:

Replied that US Fish and Wildlife Service thinks it should proceed.

COMMENT/QUESTION:

MS. CYNTHIA SIMPSON, SHA-PPD:

Asked if Mr. Coppola wants SHA to go back and re-visit purpose and need.

RESPONSE:

MR. ART COPPOLA, A.C.O.E.:

Replied no, that's fine. Stated that he's not handling this project.

MS. BARBARA ALLERA-BOHLEN, SHA-PPD:

SHA would like to drop the east side as a mitigation site and go with the Hawkins property which is an off-site mitigation, it's already been cleared environmentally. Depending on what happens with this hazardous waste study, there might be additional monitoring while it's going in on the east side and if there is disturbance SHA doesn't think that would be a good place for mitigation.

32

COMMENT/QUESTION:

MR. BILL SCHULTZ, US FWS:

Stated that US Fish and Wildlife Service wants some restoration on that Wetland 3, of that eroded wetland system. It's on the down stream side, up towards the developed area.

RESPONSE:

MS. BARBARA ALLERA-BOHLEN, SHA-PPD:

Replied that she doesn't think that's been ruled out yet but mitigation has not been developed for that yet.

RESPONSE:

MR. BILL SCHULTZ, US FWS:

Stated that SHA will have to check with Non-tidal wetlands to find out if you should proceed. Maybe they have to be brought up to speed in terms of where SHA is in the review process.

VI-106

184

**C. Wetlands Mitigation**  
**Coordination and Correspondence**

**AGENCY COMMENTS**



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

July 29, 1992

IN REPLY REFER TO:

I-270/I-370 Hawkins Property  
Wetland Mitigation Site  
Montgomery County  
(Env. File #)

Administrator	
Chief Engineer	
Dir. Office of Admin. File	✓
Dir. Office of Plan. & PE	✓
Dir. Office of Real Estate	
Dir. Office of Finance	
Spec. Asst. Atty. Gen.	
District Engr. - Dist.	
Federal Aid Section	✓

Mr. Hal Kassoff  
State Highway Administrator  
State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21202

Dear Mr. Kassoff:

We have reviewed your July 7, 1992 letter which transmitted a Final Review Reevaluation for the subject proposed wetland mitigation project. This project, I-370 from west of I-270 to Shady Grove Road, received FHWA approval August 4, 1982, with Location Approval granted September 23, 1982. It is one of the backlog wetland mitigation projects.

This particular project required the replacement of twenty acres of palustrine forested wetlands. All but nine acres were replaced on site. This proposed project will provide mitigation for those remaining nine acres and will consist of clearing, grubbing, topsoil salvaging, erosion and sediment control, planting of scrub-shrub and emergent wetland plants, upland afforestation, stream bank planting and general clean up to property that is currently grassed mowed fields. Appropriate erosion and sedimentation controls will be included in the proposed project. There are no known or foreseeable negative environmental impacts associated with the proposal.

Based on the information submitted and our knowledge of the proposed project, we concur that the proposed wetland mitigation project is consistent with the approved Final Environmental Impact Statement for I-270/I-370 and does not result in any new or different significant environmental impacts. Therefore, no further environmental documentation is required.

-more-

AG 9  
Region 2  
Maryland  
CHIEF ENGR  
Mr. P.B. Adams  
FYI  
CRG 8/18/92  
The Ronalds  
Suite 220  
711 West 40th Street  
Baltimore, Maryland 21211-2187

2.  
We would appreciate receiving a copy of the State Historic Preservation Officer's (SHPO) February 26 and April 29, 1992 letters regarding the historic and archeological resources for our files. Should you have any questions, please contact this office.

Sincerely yours,  
*Jain L. Laster*  
for  
A. P. Barrows  
Division Administrator

The Hawkins site is a wetlands mitigation bank property which is being used to mitigate a number of projects, including MD 355.

VI-107

cbf

AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

MEMORANDUM

TO: Barbara Allera-Bohlen  
Environmental Planning

FROM: Susan Jacobs, Team Leader  
Environmental Program Division

DATE: May 12, 1993

SUBJECT: Contract No. M 611-101-371  
MD 355 Wetland Mitigation Write-up for EIS Document

Mitigation for the MD 355 wetland impacts (approximately 2.02 acres maximum anticipated impacts) will be accomplished on the Hawkins Property. This site is located in north central Montgomery County, approximately two miles west of the Town of Laytonsville (see location map). MD 355 and the Hawkins site are both in the same watershed -- the Seneca Creek Drainage segment of the Washington metropolitan Area sub-basin.

The Hawkins site mitigation design is final and ready for construction. The design includes unassigned mitigation acreage that will accommodate mitigation for several road projects within this watershed sub-basin.

Existing Site Features

The Hawkins property includes 30+ acres of agricultural grassland within the 100-year floodplain of Goshen Branch which is a Class I stream. The contributing watershed of Goshen Branch at the mitigation site is approximately 2,460 acres and is agricultural and single family dwelling land use.

Two unnamed tributaries of Goshen Branch enter the mitigation site from the north. Tributary 1, located just northeast of Huntmaster Road, appears to have been channelized for agricultural drainage. It is incised approximately four to six feet and is eight to ten feet wide at the top of the bank. Tributary 1 has an upstream drainage area of approximately 108 acres. Tributary 2 is located in the far northeastern end of the site and is generally incised two to four feet and is three to four feet wide. The upstream drainage area for Tributary 2 is approximately 207 acres.

Soils on the mitigation site are mapped in the Soil Survey of Montgomery County (1990 update) as Hatboro silt loam (Typic Fluvaquent) and Baila silt loam (Typic Ochraquilt). Both soils are

poorly drained and are classified as hydric; however, on-site soil investigations reveal that the floodplain is generally characterized by moderately well-drained soils. A typical soil profile in the mitigation area is dark yellowish brown (10YR 4/4) silt loam to a depth of eight inches, underlain by yellowish brown (10YR 5/4) silt loam to twenty inches. The upper part of the subsoil from 20 to 32 inches is brown (10YR 5/3) silt loam, with common, fine, distinct yellowish red (5YR 5/6) mottles. The lower part of the subsoil to a depth of 42 inches is yellowish brown (10YR 5/6) gravelly clay loam, with few, medium, distinct brownish yellow (10YR 6/8) mottles. In general, soils on the mitigation site more closely resemble odoriferous silt loam, a moderately well-drained floodplain soil mapped in Montgomery County in similar fluvial landscape positions.

Water table investigations revealed a fluctuating water table from two to four feet below the ground surface. These water table observations support the findings of moderately well-drained soils on most of the site.

Mitigation Design

The design for the Hawkins Property wetland mitigation includes mitigation for I-270/I-370 with additional unassigned mitigation banking acreages. Table 1 shows the breakdown of wetland mitigation created at the Hawkins site. The total acreage of the created wetlands is 21.08 acres. Of this acreage, 10.5 acres are mitigation for I-270/I-370 impacts. The remaining acreage, 10.58 acres, will be designated for MD 355 and other road project mitigation in the future.

The mitigation plan and sections are shown in figures 1 and 2. Hydrology will be provided by intercepting groundwater discharge at the toe of slope and by capturing overflow from Tributaries 1 and 2. Additionally, a number of depressional areas will be excavated throughout the mitigation area. The mitigation plan in Figure 1 also lists the plants to be installed upon completion of excavation.

VI-108

My telephone number is \_\_\_\_\_  
Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 685-0451 D.C. Metro - 1-800-492-5082 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

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AGENCY COMMENTS



Office of Preservation Services

PROJECT DEVELOPMENT DIVISION  
MAR 2 2 25 PM '92

William Donald Schaefer  
Governor

Jacqueline H. Rogers  
Secretary, DHCD

February 26, 1992

Ms. Cynthia D. Simpson  
Deputy Division Chief  
Project Planning Division  
State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21203-0717

Re: Hawkins Wetland Mitigation Site  
Contract No. M 248-503-370  
I-270/I-370  
Montgomery County

Dear Ms. Simpson:

Thank you for your letter of January 22, 1992, received January 28, 1992. We will be unable to concur with State Highway Administration's determination of no effect for this project without additional information.

Your January 22 letter did not provide sufficient information to assess the affect of the project on standing structures. Our inventory indicates that Green Hills Farm (N-14-42), a circa 1880s dairy farm is in the immediate vicinity of the proposed Hawkins Wetland Mitigation Site. While it does not appear that any buildings are located within the boundaries of the wetland mitigation area, the setting of the farmstead could be significantly altered by the project. Please confirm whether the wetland mitigation site is located on Green Hills Farm. Please explain what the creation of this wetland mitigation site will entail (ie. grading, flooding, planting). How will the appearance of the property be changed? Please provide photographs showing the farmstead, the proposed mitigation area and the relationship between the two areas. Is the proposed mitigation area currently used for farming purposes?

*Maryland*

Division of Historical and Cultural Programs  
Department of Housing and Community Development  
100 Community Place, Crownsville, Maryland 21032-2023 (410) 514-7600

Ms. Cynthia D. Simpson  
February 26, 1992  
Page 2

We will be happy to complete the review once we have received the information requested above. Should you have any questions, please contact Ms. Elizabeth Hannold at (410) 514-7636.

Sincerely,

*Elizabeth Hannold*

Elizabeth Hannold  
Preservation Officer  
Project Review and Compliance

EAH/EJC  
9200181

cc: Ms. Rita Suffness  
Dr. Ira Beckerman  
Dr. Thomas F. King  
Mr. Mike Seebold  
Mr. Jared B. Cooper

VI-109

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AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

19201038 F  
SHA  
EJC/EAM  
MAY 14 2 54 PM '92

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

April 29, 1992

Re: Contract No. M 248-503-370  
Hawkins Wetland Mitigation Site  
Montgomery County, Maryland

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

RECEIVED

MAY 4 1992

Dear Mr. Little:

CHSCP  
DIVISION OF HISTORIC  
AND CULTURAL RESOURCES

In response to your February 26, 1992 letter, we are providing the information concerning the Green Hills Farm (M14-42). The Green Hills Farm property is currently in the subdivision process, and the property is being subdivided into eight (8) residential lots of two (2) acres or more. It is anticipated that the subdivision process will be finalized in September, 1992.

Attached are photographs and the proposed subdivision plat showing the farmhouse and its relationship to the proposed wetland area.

The mitigation site is located on the 100 year floodplain of Goshen Branch, which also overlaps the property of the Green Hills Farm. The project will consist of clearing and grubbing, topsoil salvaging, erosion and sediment control, planting of scrub-shrub and emergent wetland plants, streambank planting and general clean-up. The property where this would occur is presently a mowed grass field adjacent to Goshen Branch, and is not used for farming. After the wetland creation it will be a forested, scrub-shrub and emergent wetland with expansion of the existing vegetation along the stream.

We seek your signature on the concurrence line below documenting your agreement with our determination that this wetland project will not affect significant cultural resources. Please return

Mr. J. Rodney Little  
Page Two

this signed correspondence by May 29, 1992 and call Ms. Suffness on 333-1183 should you have any questions.

Very truly yours,

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

by: Bruce M. Simpson  
Cynthia D. Simpson  
Deputy Division Chief  
Project Planning Division

Concurrence:

Ira Beckerman  
State Historic Preservation Office

Date 5/12/92

LHE:RMS:ih

Attachments (2)

cc: Dr. Ira Beckerman  
Mr. William Branch  
Mr. Howard Johnson

VI-110

Arhus: IA BC 5/7/92  
prior review on file.

Structural IA 5/11/92

My telephone number is 333-1177

Teletypewriter for Impaired Hearing or Speech  
383-7655 Baltimore Metro - 545-0451 D.C. Metro - 1-800-492-5062 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

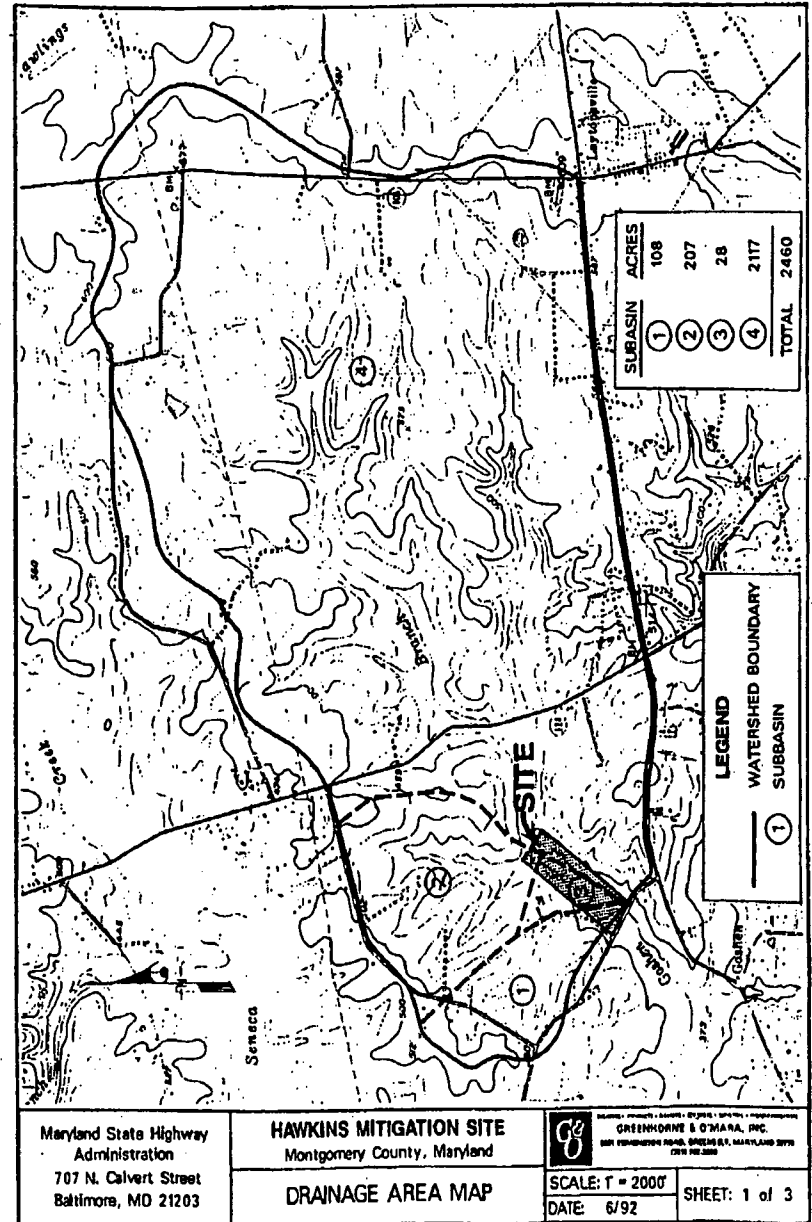
193

**AGENCY COMMENTS**

VI-111

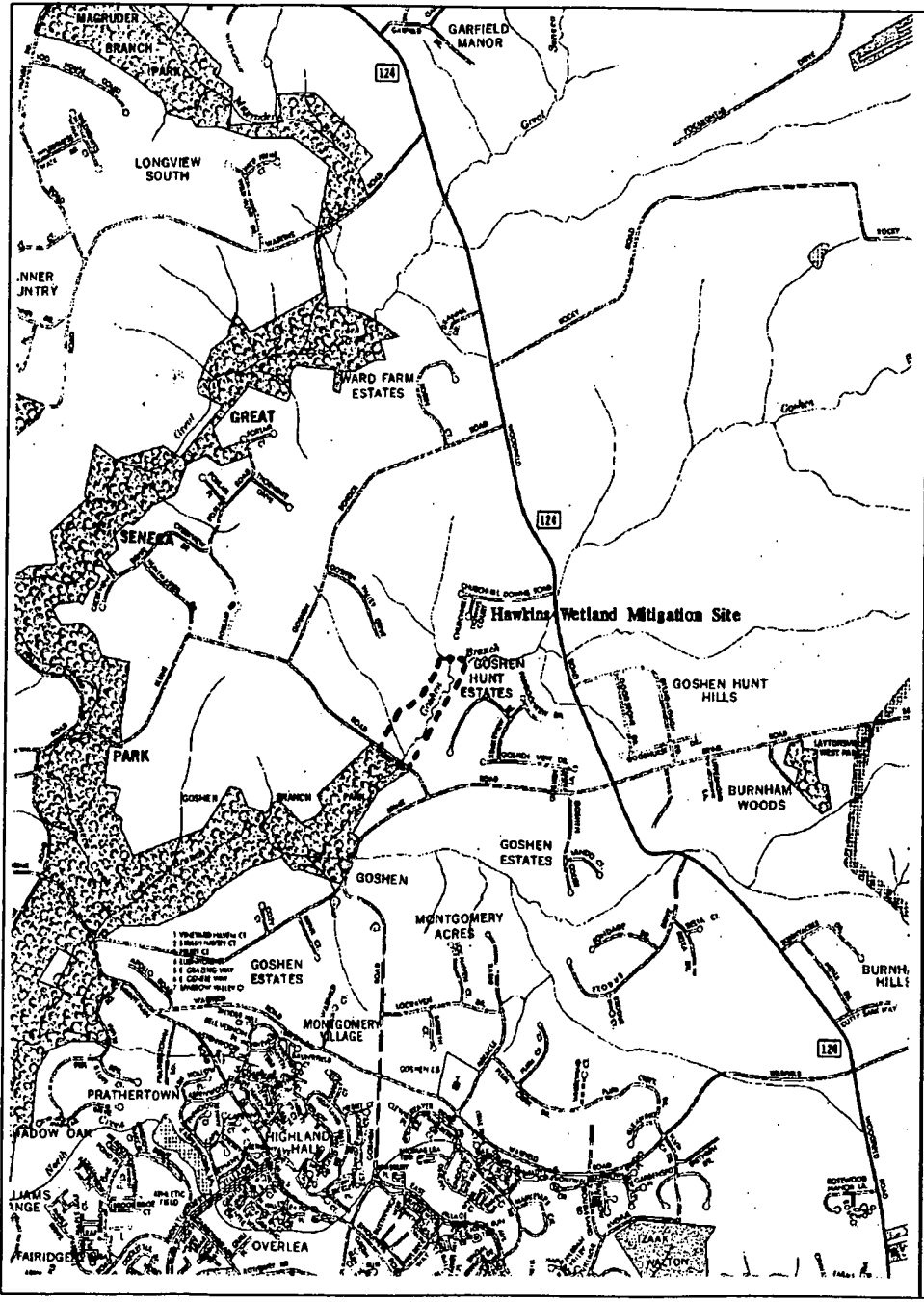
**Table 1. Hawkins Wetland Mitigation**

Description	Size
<b>Wetlands:</b>	
Palustrine Forested	15.5 acres
Palustrine Emergent	2.47 acres
Successional Wetlands	3.11 acres
<b>Total Wetland Mitigation Acreage</b>	<b>21.08 acres</b>
Upland Meadow	0.57 acres
Goshen Branch and Buffer Areas	8.35 acres
<b>Total Non-wetland Acreage</b>	<b>8.92 acres</b>
<b>Total Site Acreage</b>	<b>30.00 acres</b>



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AGENCY COMMENTS



VI-112

AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

MEMORANDUM

TO: Ms. Cynthia Simpson, Chief  
Environmental Management Division

Attn: Ms. Barbara Allera-Bohlen

FROM: Linda A. Kelbaugh, Chief *Linda A. Kelbaugh*  
Environmental Programs Division

DATE: August 23, 1993

SUBJECT: Hawkins Wetland Mitigation Site

As requested by your office this letter serves as a discussion on the above site.

Assuming that Huntmaster Road runs in a north/south direction the surrounding land use is as follows:

To the north of the site there are two subdivisions. The one closest to Huntmaster Road is zoned residential and houses are being built. The back one is zoned agricultural and is to be changed to residential.

To the east of the site is open space.

To the south of the site there is a subdivision with existing houses, zoned residential.

To the west of the site, across Huntmaster Road, is Goshen Branch Park.

A copy of the deed and plat for the Hawkins site are attached.

If you have any questions or need additional assistance please contact Chris Jednorski on extension 4169.

LAK/CJ

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

DEED

PAGE 1  
Right of Way Item No.  
82854  
SHA Contract No.  
M 248-333-372

SHA 03.11-25 3/1/90  
Mailing Address:  
Records and Research Section  
Room 605  
707 North Calvert Street  
Baltimore, Maryland 21202

TO  
THE STATE OF MARYLAND  
TO THE USE OF  
THE STATE HIGHWAY ADMINISTRATION  
OF THE  
DEPARTMENT OF TRANSPORTATION

This Deed, made this 30th day of October in the year 1993  
From MARY RIGGS STINSON, WILLIAM H. STINSON, JOYCE RIGGS HAWKINS, STANLEY B. STILES and BARBARA RIGGS STILES, his wife, and DANIEL LIGON and HAZEL R. LIGON, Trustees of the Hazel R. and Daniel Ligon Grandchildren's Truste, Grantors, to the State of Maryland to the use of the State Highway Administration of the Department of Transportation, Grantee

(A) WHEREAS, the State Highway Administration of the Department of Transportation, acting for and on behalf of the State of Maryland, finds it necessary to acquire the land, easements, rights and/or controls, shown and/or indicated on State Highway Administration's Plats numbered 53339

which are duly recorded, or intended to be recorded, among the Land Records of

MONTGOMERY County(ies) in the State of Maryland in order to lay out, open, establish, construct, extend, widen, straighten, grade and improve as a part of the State Roads System of Maryland, a highway and/or bridge, together with the appurtenances thereto belonging, under its Contract Number M 248-503-370 and known as

Wetland Mitigation

and to thereafter use, maintain and/or further improve said highway and/or bridge, as a part of the Maryland State Roads System.

(B) NOW, THEREFORE, THIS DEED AND RELEASE WITNESSETH: That for and in consideration of the above premises, One Dollar (\$1.00) and other good and valuable considerations, the grantors whereof is hereby acknowledged, we do hereby grant and convey unto the STATE OF MARYLAND, TO THE USE OF THE STATE HIGHWAY ADMINISTRATION OF THE DEPARTMENT OF TRANSPORTATION, its successors and assigns, FOREVER IN FEE SIMPLE, all our right, title and interest, free and clear of all liens and encumbrances, in and to

(C) ALL THE LAND, together with the appurtenances thereto belonging, or in anywise appertaining, lying between the outermost lines designated "Right of Way Line," as shown and/or indicated on the hereinbefore mentioned plats, all of which plats are made a part hereof, so far as our property and/or our rights may be affected by the said proposed highway and/or bridge, and the appurtenances thereto belonging, or in anywise appertaining.

ESTABLISHED  
 92 OCT 13 11 00 AM '93  
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 11/1

VI-113

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AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

Aug 11 '93

93027.SHA

August 4, 1993

TO: Linda Kelbaugh, Chief  
Environmental Programs Division  
FROM: Karen Coffman *Karen Coffman*  
COPIES TO : See Distribution  
SUBJECT: Contract No. M-611-101-371  
MD 355 (Wetland #3) from MD 124 to MD 27

A field meeting was held on July 22, 1993 to address the suggestion by US FWS that SHA investigate the possibility of upgrading wetland #3 as on-site mitigation for wetland impacts incurred in the realignment and widening of MD 355. Those attending the meeting were:

- Paul Wetlaufer, US COE
- Jill Reichert, MD DNR
- Sean Smith, MD DNR
- Karen Coffman, SHA.

Karen Coffman explained that SHA will not propose a mitigation concept at this time. The wetland degradation is due to both untreated storm water runoff entering the wetland from a shopping center across MD 355 and highly erodible soils around the wetland (see attached soils map and soils descriptions). SHA will continue investigating the feasibility of controlling the shopping center runoff and incorporating this control into the design of the roadway stormwater management. These investigations will continue through the design phase of the road project and the decision as to whether this mitigation is feasible will be made at that time. *-why?*

It was suggested by Paul Wetlaufer that SHA build a stormwater management facility on the PEPCO easement that runs south of the wetland (see sketch). Sean Smith stated that SHA should plan to control the first 1/2 inch of runoff in that area or manage the 2 year frequency (or more frequent) storm. Paul Wetlaufer also suggested that the use of weirs to allow the velocity of the storm runoff instead of a stormwater management pond would also be considered.

Paul Wetlaufer also expressed concern for the existing, rip-

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-114

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AGENCY COMMENTS



STATE OF MARYLAND  
DEPARTMENT OF THE ENVIRONMENT  
2500 Broening Highway Baltimore, Maryland 21224  
(410) 631- 3609

William Donald Schaefer  
Governor

David A.C. Carroll  
Secretary

September 8, 1993

Mr. Louis H. Ege, Jr., Deputy Director  
Office of Planning and Preliminary Engineering  
Maryland Department of Transportation  
State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21203-0717

Attn.: Mr. Jeffery H. Smith

Re: Contract No. M 611-151-371  
MD 355; MD 124 to MD 27  
Montgomery County, Maryland  
PDMS No 153397

Dear Mr. Smith:

The Administration has received and Reviewed the August 11, 1993 transmittal for the above referenced project. The review, as requested, was for the Proposed Wetland Mitigation Site/Strategy for the MD 355 project. The following comments are a result of that review:

Based upon the information presented, the Administration concurs with the strategy to investigate the possibility of designing a stormwater facility that would result in the restoration of "Wetland 3" through the elimination and correction of damage caused by untrseted runoff entering "Wetland 3" and its tributary from a developed area.

All MD 355 impacts to be mitigated on the proposed Hawkins property mitigation site must be accomplished in Zones 1 and/or 2 as shown on figure 19.

The Administration appreciates the opportunity to provide comments on this element of the project. If you have any questions regarding the above comments, please call.

Sincerely,

James K. Tracy, P.E.  
Water Resources Engineer  
Water Management Administration

JKT

VI-115

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AGENCY COMMENTS



DEPARTMENT OF THE ARMY  
BALTIMORE DISTRICT, CORPS OF ENGINEERS  
P.O. BOX 1719  
BALTIMORE, MARYLAND 21203-1715

SEP 21 1993

REPLY TO ATTENTION OF:  
Operations Division

Subject: CENAB-OP-RX (MD SHA/MD RT 355, FROM MD 27 TO MD 124)  
#M611-101-371)92-00631

Mr. George Walton  
Maryland State Highway Administration  
707 North Calvert Street  
Baltimore, MD 21203-0717

Dear Mr. Walton:

This is in reply to your August 5, 1993 request for the Corps' concurrence in the use of the Hawkins Mitigation Site to accomplish off-site mitigation for the subject project. This letter supplements our August 17, 1993 letter which previously approved your proposal to accomplish some portion of the mitigation on-site at wetland W-3.

In consideration of the fact that on-site mitigation opportunities are not available at Great Seneca Creek, and that the Hawkins Mitigation Site is in the same subwatershed, we concur in the proposal to accomplish the remainder of the mitigation off-site at Hawkins. Because this site is also to be used for the mitigation of other specific projects (I-270/I-370 and Baltimore County's Watkins Mill Road) as well as undesignated future projects, we request that you delineate on the enclosed map of the site the portion of the site which is to be earmarked for the MD Route 355 project, and the portion of the site which has been earmarked for I-270/I-370 and Watkins Mill Road. In this manner, we will be able to maintain an accounting of the acreage which has been allocated and the acreage which remains to be used.

If you have any questions, please contact Mr. Paul Wettlaufer (962-1844) or Ms. Julie Metz (962-6086) of this office.

Sincerely,

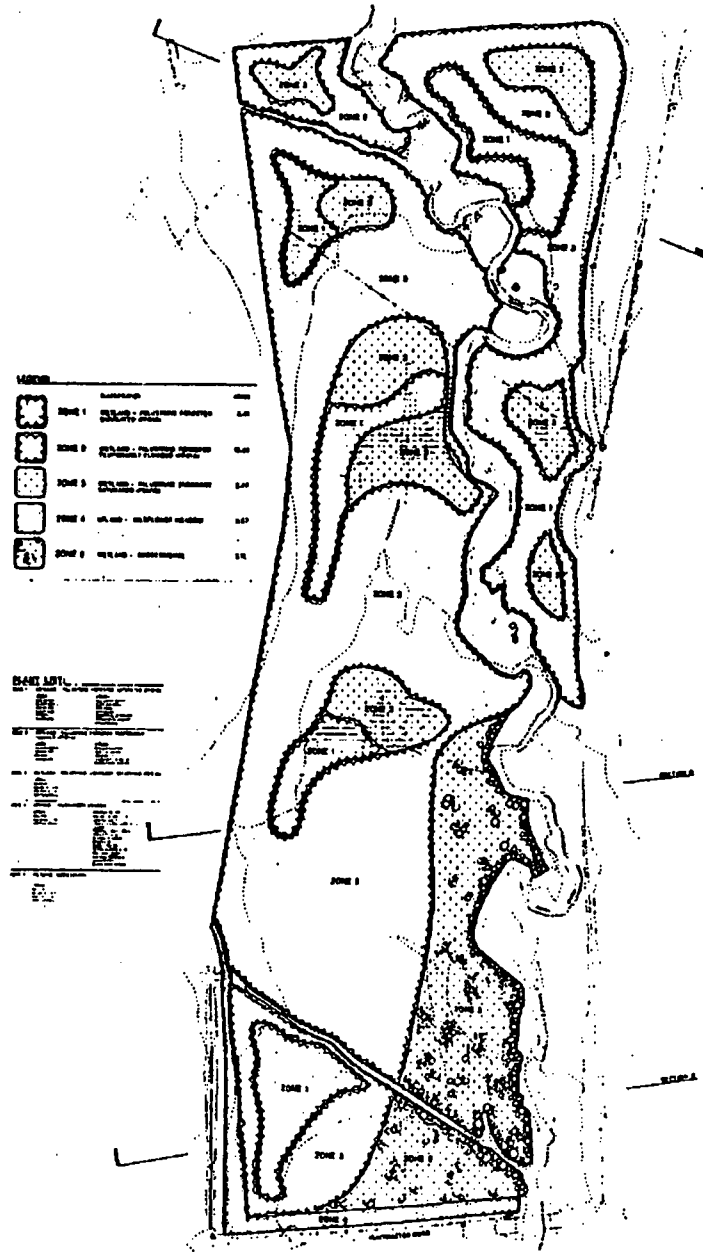
Keith A. Harris  
Acting Chief, Special Projects

Encl

Maryland Route 355  
MD 27 TO MD 124  
MARYLAND STATE HIGHWAY ADMINISTRATION

Wetlands Mitigation Site  
(Hawkins Property)

Figure 18



VI-116

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AGENCY COMMENTS



Post-It® brand fax transmittal memo 7671		# of pages 1	
To: Jeff Smith	From: E. Ghigiarulli	cc: DNR-WRA	
cc: SNA		Phone: 410-974-2156	
Dept:		Fax: 410-974-3907	
Fax: 333-1095			

William Donald Schaefer  
Governor

Maryland Department of Natural Resources  
Water Resources Administration

Tawes State Office Building  
Annapolis, Maryland 21401

Torrey C. Brown, M.D.  
Secretary

Robert D. Miller  
Director

"A Commitment to Excellence in Managing Maryland's Water Resources"

September 21, 1993

Mr. Jeffrey H. Smith  
State Highway Administration  
707 North Calvert Street  
Baltimore, MD 21202

RE: MD 355: MD 124 to MD 27  
Proposed Wetland Mitigation Strategy  
Montgomery County

Dear Mr. Smith:

The Department of Natural Resources has reviewed the proposed wetland mitigation strategy for the MD 355 project. At the field meeting held on July 22, 1993, the resource agencies recommended that the potential for a stormwater quantity management retrofit be investigated to address the uncontrolled runoff currently discharging to the wetland. The resource agencies agreed that the impacts to Wetland 3 after the required minimum of 1:1 in-kind replacement was completed. We strongly encourage the continued investigation of the retrofit.

In general, we concur with a mitigation strategy which incorporates the above described out-of-kind activities and completion of the remaining mitigation with in-kind creation at the Hawkins Property. Also, we recommend that the Hawkins Property be reviewed by the Interagency Mitigation Task Force to ensure no future difficulties with its use as a wetland bank site.

If you have any questions, please contact me.

Sincerely,

*Elder A. Ghigiarulli, Jr.*  
Elder A. Ghigiarulli, Jr.  
Chief, Coastal Zone Consistency Unit

EAGJr:cma  
cc: Sean Smith, TID  
Kevin Smith, WRA/MTW

Telephone: (410) 974-2156  
DNR TTY for the Deaf: 301-974-3683

VI-117

200



AGENCY COMMENTS



Maryland Department of Transportation  
State Highway Administration

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

August 5, 1993

RE: Contract No. M 811-151-371  
MD 355: MD 124 to MD 27  
Montgomery County, Maryland  
PDMS No. 163397

Mr. Roy Denmark  
NEPA Compliance Section  
Environmental Protection Agency  
Region III  
841 Chestnut Avenue  
Philadelphia PA 19107

Dear Mr. Denmark:

In accordance with the combined environmental/regulatory process, the State Highway Administration (SHA) requests your concurrence on the Proposed Wetland Mitigation Site/Strategy for the MD 355 project.

The MD 355 project will impact approximately 1.34 acres of non-tidal palustrine forested wetlands. The anticipated mitigation ratio for these impacts is 2:1 which brings our mitigation requirement to 2.68 acres.

At the April 21, 1993 Interagency Meeting, it was suggested by the environmental agencies that SHA send out the letters for concurrence on the Selected Alternate without the proposed mitigation sites in that letter. Additionally at that meeting, it was requested by the U.S. Fish and Wildlife Service that SHA consider restoration to Wetland 3 as part of the mitigation for this project and to inform the Maryland Department of Natural Resources Non-tidal Wetland Division of where SHA is, in terms of the review process.

My telephone number is 410-333-3439  
Maryland Relay Service for Impaired Hearing or Speech  
1-800-735-2258 Statewide Toll Free  
707 North Calvert Street, Baltimore, Maryland 21202

Mr. Denmark  
Page Two

Since that time, a field meeting was held on July 22, 1993 in which the restoration of Wetland 3 was discussed with the agencies. It was agreed that SHA will investigate the possibility of designing the stormwater runoff facilities for the section near Wetland 3 to incorporate additional runoff currently entering the site from east of MD 355 through a culvert. The intention is to eliminate and correct damage to Wetland 3 and its tributary caused by untreated runoff entering the site from a developed area. This investigation will include the possibility of locating a storm water management facility in the vicinity of the site to correct for past erosion and sedimentation. The placement of the mitigation credit will be worked out between this site and the Hawkins property as SHA gains more information during the design phase about the actual characteristics of the runoff. Agency input and direction will play a role in this process.

The remainder of the impacts not mitigated at Wetland 3 will be mitigated on the Hawkins property, a wetland bank site. The mitigation design for the Hawkins property is final and ready for construction, and the design includes unassigned mitigation acreage that will accommodate mitigation for several road projects within this sub-basin.

The Hawkins property is an off site mitigation area for the MD 355 project. It is located in north central Montgomery County, approximately two miles west of the town of Laytonsville (see location map). The MD 355 property and the Hawkins site are both in the same watershed which is the Seneca Creek Drainage segment of the Washington Metropolitan Area sub-basin.

The design for the Hawkins property wetland mitigation includes mitigation for the I-270/I-370 project with additional unassigned mitigation banking acreages. The Hawkins property received approval as a mitigation site from the Federal Highway Administration on July 29, 1992. Enclosed is a copy of the approved mitigation plan for the Hawkins property. The total acreage of the created wetlands is 21.08 acres. Of this acreage, 10.6 acres are mitigation for the I-270/I-370 impacts. The remaining acreage, 10.58 acres, will be designated for MD 355 and other future road projects.

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AGENCY COMMENTS


Mr. Denmark  
Page Three

Please provide your concurrence with the wetland mitigation site/strategy by August 30, 1993 and indicate such on the signature line below. Please return your response to Attn: Mr. Jeffrey H. Smith. Should you require additional information, please contact Mr. George W. Walton at 333-3439.

Very truly yours,

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

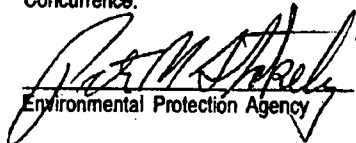
by:

  
George W. Walton  
Assistant Division Chief  
Project Planning Division

LHE:BA-B:sjc  
Enclosure

- cc: Ms. Jareene Barkdoll
- Mr. Louis H. Ege, Jr.
- Ms. Linda Kelbaugh
- Mr. Earl Schaefer
- Mr. Ed Schatz
- Mr. Jeffrey H. Smith
- Ms. Cynthia D. Simpson
- Mr. James Wynn

Concurrence:

  
Environmental Protection Agency

9-14-93  
Date

611-1A

lol

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**MARYLAND ROUTE 355 IMPROVEMENTS  
FROM MD 27 TO MD 124  
CONTRACT NO. M611-151-371**

**FINDING OF NO SIGNIFICANT IMPACT**

**VII. APPENDIX**

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**SUMMARY OF THE RELOCATION ASSISTANCE PROGRAM  
OF THE STATE HIGHWAY ADMINISTRATION OF MARYLAND**

All State Highway Administration projects must comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 USC 4601) as amended by Title IV of the Surface Transportation & Uniform Relocation Assistance Act of 1987 (P.L. 100-17), the Annotated Code of Maryland entitled "Real Property Article" Section 12-112 and Subtitle 2, Sections 12-201 to 12-212. The Maryland Department of Transportation, State Highway Administration, Office of Real Estate administers the Transportation Relocation Assistance Program in the State of Maryland.

The provisions of the Federal and State laws require the State Highway Administration to provide payments and services to persons displaced by a public project. The payments include replacement housing payments and moving costs. The maximum limits of the replacement housing payments and moving costs. The maximum limits of the replacement housing payments are \$22,500 for owner-occupants and \$5,250 for tenant-occupants. Certain payments may also be made for increased mortgage interest costs and/or incidental expenses. In order to receive these payments, the displaced person must occupy decent, safe and sanitary replacement housing. In addition to these payments, there are also moving expense payments to persons, businesses, farms and non-profit organizations. Actual but reasonable moving expenses for residences are reimbursed for a move of up to 50 miles or a schedule moving payment of up to \$1,300 may be used.

In the event comparable replacement housing is not available within the monetary limits for owners and tenants displaced by public projects or available replacement housing is beyond their financial means, Replacement Housing of Last Resort will be utilized. Detailed studies must be completed by the State Highway Administration before Relocation Housing of Last Resort can be utilized.

The moving cost payments to businesses are broken down into several categories, which include actual moving expense payments, reestablishment expenses limited to \$10,000 or fixed payments "in lieu of" actual moving expenses of \$1,000 to \$20,000. Actual moving expenses may also include actual direct losses of tangible personal property and expenses for searching for a replacement site up to \$1,000.

The actual reasonable moving expenses may be paid for a move by a commercial mover or for a self-move. Payments for the actual reasonable expenses are limited to a 50-mile radius unless the State determines a longer distance is necessary. The expenses claimed for actual cost moves must be supported by firm bids and receipted bills. An inventory of the items to be moved must be prepared in all cases. In self-moves, the State will negotiate an amount for payment, usually lower than the lowest acceptable bid. The allowable expenses of a self-move may include amounts paid for equipment hired, the cost of using the business vehicles or equipment, wages paid to persons who participate in the move, the cost of actual supervision of the move, replacement insurance for the personal property moved, costs of licenses or permits required and other related expenses.

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In addition to the actual moving expenses mentioned above, the displaced business is entitled to receive a payment for the actual direct losses of tangible personal property that the business is entitled to relocate but elects not to move. These payments may only be made after an effort by the owner to sell the personal property involved. The costs of the sale are also reimbursable moving expenses.

If the business elects not to move or to discontinue the use of an item, the payment shall consist of the lesser of: the fair market value of the item for continued use at the displacement site, less the proceeds from its sale; or the estimated cost of moving the item.

If an item of personal property which is used as part of a business or farm operation is not moved and is promptly replaced with a substitute item that performs a comparable function at the replacement site, payment shall be of the lesser of: the cost of the substitute item, including installation costs at the replacement site, minus any proceeds from the sale or trade-in of the replaced item; or the estimated cost of moving and reinstalling the replaced item.

In addition to the moving payments described above, a business may be eligible for a payment up to \$10,000 for the actual reasonable and necessary expenses of reestablishing at the replacement site. Generally, reestablishment expenses include certain repairs and improvements to the replacement site, increased operating costs, exterior signing, advertising the replacement location and other fees paid to reestablish. Receipted bills and other evidence of these expenses are required for payment. The total maximum reestablishment payment eligibility is \$10,000.

In lieu of all moving payments described above, a business may elect to receive a fixed payment equal to the average annual net earnings of the business. This payment shall not be less than \$1,000 nor more than \$20,000. In order to be entitled to this payment, the State must determine that the business cannot be relocated without a substantial loss of its existing patronage; the business is not part of a commercial enterprise having more than three other establishments in the same or similar business that are not being acquired; and the business contributes materially to the income of a displaced owner during the two taxable years prior to the year of the displacement. A business operated at the displacement site solely for the purpose of renting to others is not eligible. Considerations in the State's determination of loss of existing patronage are the type of business conducted by the displaced business and the nature of the clientele. The relative importance of the present and proposed locations to the displaced business and the availability of suitable replacement sites are also factors.

In order to determine the amount of the "in lieu of" moving expenses payment, the average annual net earnings of the business is to be one-half of the net earnings, before taxes during the two taxable years immediately preceding the taxable year in which the business is relocated. If the two taxable years are not representative, the State may use another two-year period that would be more representative. Average annual net earnings include any compensation paid by the business to the owner, owner's spouse, or dependents during the period. Should a business be in operation less than two years, the owner of the business may still be eligible to receive the "in lieu of" payment. In all cases, the owner of the business must provide information to support its net earnings, such as income tax returns, or certified financial statements, for the tax years in question.

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Displaced farms and non-profit organizations are also eligible for actual reasonable moving costs up to 50 miles, actual direct losses of tangible personal property, search costs up to \$1,000 and reestablishment expenses up to \$10,000 or a fixed payment "in lieu of" actual moving expenses of \$1,000 to \$20,000. The State may determine that a displaced farm may be paid a minimum of \$1,000 to a maximum of \$20,000, based upon the net income of the farm, provided that the farm has been relocated or the partial acquisition caused a substantial change in the nature of the farm. In some cases, payments "in lieu of" actual moving costs may be made to farm operations that are affected by a partial acquisition. A non-profit organization is eligible to receive a fixed payment or an "in lieu of" actual moving cost payment, in the amount of \$1,000 to \$20,000 based on gross annual revenues less administrative expenses.

A more detailed explanation of the benefits and payments available to displaced persons, businesses, farms and non-profit organizations is available in the "Relocation Assistance" brochure that will be distributed at the public hearing for this project and be given to displaced persons.

Federal and state laws require that the State Highway Administration shall not proceed with any phase of a project which will cause the relocation of any persons, or proceed with any construction project, until it has furnished satisfactory assurances that the above payments will be provided, and that all displaced persons will be satisfactorily relocated to comparable decent, safe and sanitary housing within their financial means, or that such housing is in place and has been made available to the displaced person.