REPORT NUMBER: FHWA-MD-EA-80-04(F)
REGION III

Contract No. M 971-000-370
F.A.P. No. F 120-1 (1)
Interstate 270/
Maryland Route 124 Interchange
In Montgomery County, Maryland
March, 1981



# FEDERAL HIGHWAY ADMINISTRATION FINDING OF NO SIGNIFICANT IMPACT

FOR

INTERSTATE 270 AND MARYLAND 124 INTERCHANGE MONTGOMERY COUNTY, MARYLAND

The FHWA has determined that this project will not have any significant impact on the environment. This finding of no significant impact is based on the environmental assessment and the attached information, which summarizes the assessment and documents the selection of Alternate 3/2. The environmental assessment has been independently evaluated by the FHWA and determined to adequately and accurately discuss the environmental issues and impacts of the proposed project. It provides sufficient evidence and analysis for determining that an environmental impact statement is not required.

3/6/8/

Date

Emil Elinsky Division Administrator



#### TABLE OF CONTENTS

Record of Decision

Cost Effective Analysis

Summary of Action and Recommendation

Public Hearing Comments

Correspondence

RECORD OF DECISION



James J. O'Donnell Secretary M. S. Caltrider Administrator

October 31, 1980

#### MEMORANDUM

TO:

Mr. Wm. I. Slacum, Secretary

State Roads Commission

FROM:

Hal Kassoff, Director

Office of Planning and Preliminary Engineering

SUBJECT:

Contract No. M 971-151-372

I-270/Maryland 124 Modified Interchange

The Bureau of Project Planning through its consultant, HDR, Inc., is completing environmental tasks in preparation for the submittal of a "Finding Of No Significant Impact" (FONSI) to the Federal Highway Administration (FHWA) requesting Location Approval for the proposed I-270/Maryland 124 interchange project. It is anticipated that the applicable environmental documentation will be ready to submit to the Federal Highway Administration by the end of November, 1980. The decision to recommend that Location Approval be requested for the initial construction of Alternate 3 and the ultimate construction of Alternate 2 was made by Administrator Caltrider at a meeting held on October 24, 1980.

Attached for your information and use are copies of the following memorandums:

- -October 28, 1980, summarizing the October 24th meeting with the Administrator;
- -October 23, 1980, Project Summary and Staff Recommendations.

This information is being sent to you as part of the procedure by which you submit the action to Mr. Caltrider, receive his approval, and formally record and file this action.

I concur with the above information.

11/12/80 Date

M. S. Caltrider

State Highway Administrator

HK:mcr Attachments

Mr. Frederick Gottemoeller

Mr. Wm. K. Lee, III
Mr. Wm. F. Lins, Jr.
Mr. Eugene T. Camponeschi
Mr. Paul A. Milash
Mr. Wm. F. Schneider, Jr.

COST EFFECTIVE ANALYSIS

#### COST EFFECTIVE ANALYSIS

G
•

Impact Category	SELECTED 2	ALTERNATE 3	Alternate 4	No Build
Houses displaced	0	0	0	0
Estimated number of persons affected	0	0	0	0
Businesses displaced	0	0	. 0	0
Unimproved property affected	0	0	0	0
Historical sites affected	0	0	0	0
Noise level impact (sites exceeding design noise levels)	2	2	2	3
Air quality impact (sites exceeding standards)	0 ·	0	0	0
Floodplain areas affected	Yesl	Yes; 4.4 ac.	Yes; 3.8 ac.	No
Wetland areas affected	No	No	No	No
Add'l acres of right-of-way req'd	8.8	5.8	5.6	0
Residential	0	0	0	0
Commerical	8.8	5.8	5.6	0
Public Recreation Lands	0	0	0	0
Archeological Sites	0	.0	0	0
Endangered or threatened species	0	0	0	0
Cost				
Estimated construction cost	\$7,350,000 <sup>2</sup> ,3	\$5,155,000	\$5,530,000	0
Estimated Right-of-Way Cost	\$2,160,000 <sup>2</sup> ,3	\$1,010,000	\$990,000	0

<sup>1</sup> Acreage would vary depending on improvement selected at MD 924.

<sup>2</sup> Costs for Alternate 2 do not include area at MD 924; to get total costs, add costs for Alternate 2 to the costs for either Alternate 3 or 4.

<sup>3</sup> Costs for Alternate 2 include construction at MD 924/MD 117 intersection (\$450,000).

SUMMARY OF ACTION AND RECOMMENDATION

# Maryland Department of Transportation

James J. O'Donnell Secretary

M. S. Caltrider Administrator

State Highway Administration October 23, 1980

#### MEMORANDUM .

TO:

Mr. M. S. Caltrider

State Highway Administrator

FROM:

Hal Kassoff, Director
Office of Planning and

Preliminary Engineering

SUBJECT:

Contract No. M 971-151-372

I-270/Maryland 124 Interchange

The following is a summary of the status of the I-270/Maryland 124 interchange project to date including the Combined Location/Design Public Hearing held on August 28, 1980 and subsequent comments. This information is for your use in the evaluation of the staff recommendations prior to our meeting in your office scheduled for October 24, 1980 at 9:30 a.m. in solicitation of your concurrence.

### I. Background

A. The existing I-270/Maryland 124 tight cloverleaf interchange is inadequate to serve current traffic demands. Due to heavy weaving movements along the I-270 and Maryland 124 mainlines, major back-ups occur on a regular basis along the I-270 mainline. Frequently a double line queue develops on I-270 northbound, in effect limiting the mainline to two lanes of through traffic movement. These conditions contribute to a serious safety hazard on the Interstate System. The Project Planning Study was conducted to determine means to relieve these undesirable conditions and to provide a safer facility to serve existing and projected traffic needs.

# B. Project Planning History:

1. Documents supporting improving the I-270/Maryland 124 interchange include: the 1973 COG Long Range Transportation Plan, the 1975 City of Gaithersburg's Corridor City Master Plan, and the MDOT 1978 Maryland Transportation Plan. Reconstruction of this interchange appears in the State Highway Administration's 1979-1998 Twenty

Year Highway Needs Study (Interstate line 41) and the 1980-1985 Interstate Program (I-270), with Project Planning scheduled for fiscal years 1980 and 1981, and Design beginning in fiscal year 1981. No other activities are included in the current program.

### 2. Project schedule:

- -Project Planning studies initiated in February, 1980.
- -Announcement regarding start of studies was made at the March 11, 1980 I-370 Alternates Public Meeting.
- -A report entitled "Justification for Reconstruction of of I-270/Maryland 124 Interchange in Montgomery County, Maryland" was forwarded to the Federal Highway Administration by letter dated April 16, 1980. This letter also requested approval of Interstate access points and approval to utilize Federal Aid Interstate funds to modify the interchange. Federal Highway Administration approval for additional access points on I-270 was received by letter dated September 19, 1980. However, approval for Interstate funding is pending additional documentation as to existing safety deficiencies at I-270/Maryland 124.
- -A public informational display was held on July 1, 1980.
- -The Environmental Assessment document was placed on public display on July 29, 1980 and forwarded to reviewing agencies on July 30, 1980.
- -A Combined Location-Design Public Hearing was held on August 28, 1980.
- -Complete Final Environmental Document -- November 24, 1980.
- -Obtain Federal Highway Administration Location Approval-- December, 1980.

#### 3. Consultants involved:

- -HDR, Inc. -- Engineering and Environmental Documents
- -AMV, Inc. -- Traffic analysis.

# 11. The Alternates (see attached brochure for additional information)

### A. Description:

- 1. Alternates studied but dropped:
  - -Alternate #1 proposed all reconstruction to take place at the existing interchange site. This alternate was eliminated due to adverse environmental impacts and high costs. Its construction would have displaced a lumber yard and a proposed hotel, and would have restricted access to several other businesses and a State Highway Administration facility.
  - -Alternate #5 (TSM) proposed reconstructing the north-bound off-ramp from I-270 to eastbound Maryland 124 to two lanes, and installing a traffic signal at its intersection with Maryland 124. This alternate was dropped when it was determined that this proposal would only be useful for two to three years, and that this short term improvement would not alleviate the other operational problems at the interchange.
- 2. Alternates presented at Public Hearing:
  - -No-Build--No major improvements would be made to the existing highway and interchange. Normal maintenance would continue and spot improvements would be undertaken where possible within the existing right of way.
  - -Alternate #2--Proposes major reconstruction of the existing interchange which would include relocating two ramps to Maryland 924 (recently redesignated as Maryland 117), and construction of collector-distributor roads. The two ramps proposed to be relocated to Maryland 117 would be the northbound I-270 to westbound Maryland 124, and the eastbound Maryland 124 to southbound I-270. These two ramps would be as proposed for Alternate 3 or 4 as described herein.
  - -Alternate #3--Proposes relocating the above two ramps to Maryland 117 and constructing a northbound collector-distributor road. Under this alternate, the two existing ramps at Maryland 124 would be closed.

-Alternate #4--Also proposes relocating two ramps to Maryland 117 and closing two existing ramps at Maryland 124. However, with Alternate 4, the northbound I-270 to westbound Maryland 117 off-ramp is proposed to be a directional ramp over I-270 in lieu of a conventional loop under I-270 as proposed for Alternate 3.

-All proposed build alternates propose reconstruction of the Maryland 124/Maryland 117 intersection to provide additional through and turning lanes, and the widening of Maryland 117 to four lanes from west of I-270 to the Maryland 124/Maryland 117 intersection to provide for four through lanes.

#### B. Service Characteristics:

1. Current and Forecast Traffic (ADT)

I-270	S/Md. 117	S/Md. 124	N/Md. 124
1980	76,850	76,850	47,000
2005 (No Build)	114,400	114,400	84,000
2005 (Build)	114,400	86,700	84,000
Md. 124	W/Md. 117	W/I-270	E/I-270
1980	15,450	30,250	37,700
2005 (No Build)	29,200	53,800	55,400
2005 (Build)	29,200	26,100	55,400
Md. 117 1980 2005 (No Build)	N/Md. 124 23,700 39,350 39,350	W/I-270 14,800 24,550 52,150	W/Md. 355 10,600 21,000 21,000

2. Current and Forecast Level of Service (Peak Hours)

۷.	Current and Foreca	ast hevel of betvice (reak ind	1.09	1980	2005
		I-270 northbound to Maryland	- '	F	F
•	124 westbound. Proposed Ramp - 117 westbound.	I-270 northbound to Maryland	-	X	С
	Existing Ramp - I-270 southbound.	Maryland 124 westbound to	-	С	D
	Proposed Ramp - I-270 southbound.	Maryland 117 westbound to	-	Χ	D

Projected Levels of Service for all other locations within the Study Area will generally not be affected whether or not the proposed I-270/Maryland 124 interchange modifications are implemented.

3. Accident Information (I-270 @ Md. 124 interchange):

Severity	10 ½ months 1979	Projected Completed 1979	1978	<u> 1977</u>
Fatal Accidents	-	-	-	-
Injury Accidents	12	13	5	12
Property Damage Only	9	17	22	27
Total Accidents	21	30	27	39

Peak period ramp studies indicate substantial increases in the accident rates for Md. 124 eastbound to I-270 southbound, and I-270 northbound to Maryland 124 westbound. Also, the Maryland 124 intersections at Maryland 355 and at Maryland 117 are classified as High Accident Intersections.

- 4. Other Current and Forecast Service Characteristics:
  - -I-270 peak traffic periods are between 7 and 9 a.m., and 4 and 6 p.m. Maryland 124 peak traffic periods are between 7 and 9 a.m., and 5 and 7 p.m.
  - -Double line back-ups occur daily on northbound I-270 at Maryland 124. The I-270 northbound to Maryland 124 eastbound ramp back-up sometimes extends to the Muddy Branch overpass which is 6000' south of Maryland 124. The I-270 northbound to Maryland 124 westbound ramp back-up frequently extends to the B & O Railroad overpass which is 1,400' south of Maryland 124.
- C. Environmental Consequences:
  - 1. Natural Environment:
    - -No environmentally significant areas were identified.
  - -Alternates 3 and 4 would disturb 4.4 and 5.8 acres, respectively, of the upper limits of the 100-year flood-plain of Long Draught Branch.

#### 2. Socio-economic:

- -No homes or businesses would need to be acquired by any of the current study alternates (No-Build and Alternates 2, 3, and 4).
- -Alternate 2 would require the acquisition of approximately 14.5 acres of right of way which would involve approximately 20 separate properties. If alternate 4 is selected as part of this alternate, a State Highway Administration salt storage facility would have to be relocated.
- -Alternate 3 would require the acquisition of approximately 5.8 acres of right of way. No improvements would need to be relocated with this alternate.
- -Alternate 4 would require the acquisition approximately 5.6 acres of right of way and the relocation of a State Highway Administration salt storage facility.

# 3. Environmental Mitigation Commitments:

- -If during construction, archeologically significant artifacts at a previously unknown site are discovered in concert with the policy of the State Highway Administration, all construction would cease. Construction would be permitted to continue only after all data collection has been completed by a qualified archeologist.
- -Landscaping treatments will be used to help integrate all new improvements into the existing environment.
- -Any proposed highway improvements which encroach on the 100-year floodplain at Long Draught Branch will be designed so that there will be no significant risks or impacts to the beneficial floodplain values and will not provide direct or indirect support to further development within the floodplain. Also, they will be designed to assure that there would be no significant risk of property loss, hazard to life or potential for interruption of the transportation facility.
- -Noise abatement measures will be studied for areas along I-270 where noise levels in excess of design levels are indicated.

#### D. Attributes of each Build Alternate:

- -Alternate 2--Maximum improvements to safety and congestion problems and would allow for proposed ramps at Maryland 117 to be developed independently.
- -Alternate 3--Lower costs than Alternates 2 and 4.
- -Alternate 4--Least maintenance of traffic problems during construction.

#### E. Costs:

-No-Build--Normal maintenance only.

-Alternate 2--Right of Way
Construction
Sub-total

\$2,156,800
7,350,000
\$9,506,800\*

\*For Total Cost, the cost of Alternate 3 or 4 must be added to Alternate 2.

-Alternate 3--Right of Way
Construction
Total

\$1,011,000
4,575,000
\$5,586,000

-Alternate 4--Right of Way
Construction
Total

\$1,194,300\*\*
5,530,000
\$6,724,300

\*\*Includes cost to relocate State Highway Administration Salt Storage Facility.

#### III. Positions Taken:

#### A. Elected Officials:

- -Montgomery County Executive Charles W. Gilchrist by letter dated May 27, 1980 to Federal Highway Administration Division Administrator, Emil Elinsky, noted that he strongly supported this much needed and long overdue improvement.
- -City of Gaithersburg Mayor Bruce A. Goldensohn testified at the August 28, 1980 Public Hearing that he and the City Council wished to go on record as advocating that the State proceed with Alternate 3 albeit with several modifications.

These would include additional connections at Maryland 117 to provide convenient access for traffic going to or coming from Maryland 355 (Gaithersburg). He urged that consideration be given to signalizing these left turn ramp connections. Also, consideration should be given to the link-up of I-270 with Perry Parkway.

#### B. Citizens and Associations:

- -Watkins Mill Home Owners Association representatives noted strong support for anything that will improve the existing exit ramp problems at northbound I-270 to eastbound Maryland 124, and request that these improvements be implemented before any ramps are relocated to Maryland 117. They also support the proposed northbound collector-distributor road, but request that we re-evaluate the proposed southbound collector-distributor road since they envision capacity and merge problems. This organization also supports the construction of Alternate 2 now rather than constructing Alternate 3 or 4 now and Alternate 2 later.
- -Only two private citizens commented on this project. Both indicated support for Alternate 3. However, one further indicated that he also supported the modifications requested by the Mayor and Council of Gaithersburg. He also recommended that all existing ramps be kept open at the I-270/Maryland 124 interchange after the new I-270/Maryland 117 ramps are opened to traffic.
- -Six local business representatives also indicated support for proposed Alternate 3 with the modifications suggested by Gaithersburg officials.
- -Two local developers indicated support for Alternate 3. One also noted that he supported the additions proposed by Gaithersburg officials, and further recommended that no existing ramps at the I-270/Maryland 124 interchange be closed after the new ramps at I-270/Maryland 117 are completed. The other developer requested that additional through and turning lanes be provided at the Maryland 124/Maryland 117 intersections, and recommended that proposed Alternate 2 be staged as part of a continuing upgrading of I-270.

#### C. Agencies:

- -The National Capital Planning Commission in concert with the National Bureau of Standards indicated support for the ultimate construction of Alternate 2-3, and the initial construction of Alternate 3, and the signalization of the Maryland 117/Bureau Drive intersection.
- -The Maryland-National Capital Park and Planning Commission-Montgomery County indicated support for Alternate 2-3, and further requested that provisions be made for staging additional Maryland 124/Maryland 117 intersection improvements as traffic volumes increase.
- -Montgomery County Department of Transportation indicates a preference for Alternate 3, but with additional improvements to assure that the P.M. queue will not back-up beyond the proposed northbound collector-distributor road. They further recommend that the southbound collector-distributor road be eliminated and that two separate merge points be established since they fear the collector-distributor road could not handle the projected high volumes of traffic. They also recommended that the State Highway Administration should coordinate with the City of Gaithers-burg provisions for the Perry Parkway connection, and provide for additional through and turning lanes at the Maryland 124/Maryland 117 intersection.
- -All elected officials and agency representatives at the January 16, 1980 Executive Meeting concerning the proposed GEISCO development, indicated support for I-270/Maryland 124 interchange improvements.

# IV. Recommendations:

-The staff recommends that Federal Highway Administration Location Approval be requested for initial construction of Alternate 3 (including the additions and modifications noted below), and ultimate construction of Alternate 2 (including additions noted below). This recommendation is based on the superior operational characteristics of Alternate 3, the lack of support for Alternate 4, and the fact that proposed Alternate 2 improvements at I-270/Maryland 124 cannot all be finalized until the I-270 mainline study is completed.

> -Staff recommendations for Alternate 3 additions and modifications are:

- . Construct the proposed I-270 northbound collector-distributor road as a two lane facility, widen the existing 1-270 northbound to Maryland Route 124 eastbound ramp to two lanes, and if there are no right of way conflicts, carry the ramp widening along Maryland 124 to Maryland 355. This will insure that queues on the collector-distributor road will not back-up onto the I-270 mainline, and will provide a through lane on Maryland 124 for I-270 off-ramp traffic that turns south at Maryland 355.
- . Provide for signalization at the Maryland 117/Bureau Drive intersection, and construct Maryland 117 with four through lanes (two in each direction) plus a center left turn lane through this intersection. This recommendation was submitted by the Traffic Division and is favored by the Study Team.
- Provide for two through lanes in all directions plus applicable left and right turn lanes at the Maryland 124/Maryland 117 intersection. Locations where separate right turn and/or dual left turn lanes are needed, are currently being reviewed by the Traffic Division.
- -Staff recommendations for Alternate 2 additions and modifications are:
  - Eliminate the proposed I-270 southbound collector-distributor road and provide two separate ramp merge points at Maryland 124 and at Maryland 117. This will eliminate the possibility that the collector-distributor road would become overcrowded during peak periods. The southbound collector-distributor road had previously been proposed since it was felt that the Federal Highway Administration might object if these two interchange areas where not tied together. However, in recognition that the previously proposed southbound collector-distributor road could create capacity problems, and the now proposed separate merge points would be over 3000' apart and function superior to the collector-distributor road, it is felt that the Federal Highway Administration will concur with this modification.

> . Detail design of the new I-270 northbound to Maryland 124 eastbound ramp should include investigating the possibility of providing a three lane ramp and signalization at Maryland 124 to increase optimum traffic movements through this area.

#### HK: cmb Attachment

Mr. William K. Lee, III Mr. William F. Lins, Jr.

Mr. Thomas Hicks Mr. Eugene T. Camponeschi Mr. Wm. F. Schneider, Jr.

Mr. Paul A. Milash

Mr. Johnathan G. Willis Mr. Charles R. Anderson

Mr. Jerry L. White Mr. Robert J. Finck

Mr. William C. Krieger

Mr. J. Thomas Neukam

Mr. Robert J. Houst

Mr. Richard S. Krolak

Mr. C. David Feske

PUBLIC HEARING COMMENTS

#### HEARING SUMMARY

A Combined Location/Design Public Hearing was held for the project on August 28, 1980 at 7:30 p.m. in the South Lake Elementary School located at 18201 Contour Road in Gaithersburg, Maryland. The purpose of the meeting was to present information relative to the engineering and environmental analysis and to receive public comments on the project.

Five individuals made statements following the presentation by State Highway Administration personnel. The following is a summary of the statements made:

Mr. Bruce Goldensohn - Mayor City of Gaithersburg
Mr. Goldesohn expressed support for the project and
urged that it be completed as soon as possible. He went
onto review the existing inadequate traffic movements and
the related traffic problems. Mayor Goldensohn proceeded to
review the alternates and stated the City of Gaithersburg
prefered Alternate 3 with some modifications.

He stated that consideration be given to inclusion of a traffic signal at that intersection. Another addition should be the inclusion of a westbound Route 117 movement onto the ramp to eastbound I-270. That would be an entry near the proposed ramp entry by the Bureau of Standards. There should also be consideration given to the link-up of I-270 with Perry Parkway, a local road which will feed into Route 117 as well.

#### RESPONSE:

The modifications suggested would require more extensive studies and funding which would either slow down implementation of the improvements signficantly or delay the project indefinitely. Some of the problems the city's proposed modifications would encounter are greater impacts to existing local roads and development along these roads, the need to widen three local roads to serve the increased traffic with resulting greater impacts to adjoining development, and conflicts with Federal Highway Administration policies regarding Interstate access to local roads.

Mr. John Clarke - Acting Director of Planning for the Montgomery county Department of Transportation spoke on behalf of County Executive.

Mr. Clark stated that Montgomery County supports the proposed improvements and prefers Alternate 3. Stated that Alternate 2 is needed in all cases and the County, strongly supports it. Mr. Clark expressed concern that to construct Alternate 3 without improving the existing interchange could have a negative impact on the off ramp of Alternate 3 because of the traffic queues which extend beyond the I-270/Maryland 924 overpass. He suggested that a two-lane off bound ramp at Maryland 124 and/or traffic control devices at the intersection of the offbound ramp and Maryland 124 be investigated.

#### RESPONE:

Improvements at I-270/Maryland 124 cannot be finalized until the I-270 mainline study is completed. However, when Alternate 3 is constructed a two-lane off ramp will be constructed at Maryland 124. When Alternate 2 is constructed a three lane ramp and a traffic control device will be investigated.

Mr. Edgar Gonzales - Representing Watkins Mill Homeowners Association.

Mr. Gonzales expressed concern about the safely aspects of building either Alternate 3 or 4, prior to improving the northbound off-ramp of I-270 to Montgomery Village Avenue.

Mr. Gonzales stated his Civic Association only found out the details of the project the night before the meeting and requested the public hearing record be kept open for three weeks.

#### **RESPONSE:**

The ramp in questions will be constructed as two-lane to improve its capacity and safety characteristics. The transcript was left open in accordance with Mr. Gonzales' request.

Mr. John Griffin - Representing Mulligan, Griffin and Associates.

Recommended the selection of Alternate 3 and supported the statements of Mayor Goldensohn and Montgomery County.

Mr. Dual Miller - Private Citizen

Recommended a build alternate be constructed as soon as possible.

CORRESPONDENCE

September 18,1980

Mr. Richard S. Krolak, Chief Environmental Evaluation Bureau of Project Planning State Highway Administration 300 West Preston Street Baltimore, Maryland 21201

Re.: I-270 - Md 124 Interchange.

Dear Sir:

The Watkins Mill Subdivision is located about two miles east of I-270 and just north of Montgomery Village Avenue. Our development presently has approximately 225 dwelling units, and in the near future this number will increase to approximately 310 units. We, therefore, represent a population in excess of 1,000 individuals.

We have reviewed the State Highway Administration proposals for the improvement of the I-270 - Maryland 124 Interchange and have the following comments:

- 1.- We strongly support the prompt improvement of the existing interchange of I-270 and Maryland 124, Alternate 2.
- 2.- We urgently recommend that the State improve the exit ramp on northbound I-270 to eastbound Montgomery Village Avenue, prior to opening a new interchange at I-270 and Clopper Road (Md 117).
- 3.- We support either alternate 3 or 4, without major preference, provided the ramp improvements urged in (2.-) above are implemented in advance.
- 4.- We support the collector-distributor lane concept in the northbound direction of I-270, coupled with the improvements mentioned in item 2 above.
- 5.- We recommend that the State re-evaluate the proposed collector distributor road concept for the southbound direction of I-270 in alternate 2. We believe there should be separate merging points in this direction at Maryland 124 and at Maryland 117.

6.- We urgently request that the State gives high priority to the proposed improvements, in view of the existing traffic volumes, unsafe operations, and immediate and long-range population growth in this area of I-270.

We respectfully request that due consideration is given to our proposals, and wish to take this opportunity to thank you for keeping the hearing record open to allow our home owners association an opportunity to present our views.

If you need any clarification on our comments, please contact Mr. Edgar Gonzalez, at 19907 Wheelwright Dr., Gaithersburg MD 20760.

Sincerely,

Alan Gonberg Board of Directors

Watkins Mill H.O.A.

Gines Built

Janice Bracht Board of Directors Watkins Mill H.O.A.

cc. Mr. Eugene Camponeschi
District Engineer, District 3
State Highway Administration
9300 Kenilworth Avenue
Greenbelt, Maryland 20770

Mr. George Grandy, Jr. Project Manager Bureau of Project Planning 300 W. Preston Street Baltimore, Maryland 21201

Alternate 3 has been selected for initial construction, with Alternate 2 as the ultimate. A third lane has been added to the ramp discussed in Comment #2. This will increase its capacity and safety characteristics. The collector-distributor concept discussed in comment #5 has been revised to establish separate merging points.

#### NATIONAL CAPITAL PLANNING COMMISSION

STATE HWY ADM

1325 G STREET NW.

SEP 19 9 48 AH '80

WASHINGTON, D.C. 20576

In Reply Refer To: NCPC File No. 2041

SEP 11 1980

Mr. M. S. Caltrider
State Highway Administrator
Maryland Department of Transportation
300 West Preston Street
Baltimore, Maryland 21201

RETTYED

SEP 1980

PLANSING & PROUMS ANY COLLECTIONS

Dear Mr. Caltrider:

The National Capital Planning Commission, at its meeting on September 4, 1980, commented to the Maryland Department of Transportation on the proposed improvement of the interchange at Interstate Route I-270 and Maryland Route 124, Montgomery County, Maryland, as described in the Environmental Assessment (Report No. FHWA-MD-EA-80-04-(D), dated July 1980) prepared by the U.S. and Maryland Departments of Transportation, as follows:

- 1. The optimum improvement would be Alternate 2, with the ramps to be constructed at the interchange of I-270 and Maryland Route 924 in accordance with Alternate 3, and the signalization of the intersection of MD924 and Bureau Drive, as the preferred ultimate improvement of the interchange;
- 2. The minimum improvement should be Alternate 3, and the signalization of the intersection of MD924 and Bureau Drive; and
- 3. If developed in accordance with either of the above recommendations, the proposed improvement of the I-270/Maryland Route 124 interchange would have a beneficial impact on the Federal establishment and other Federal interests in the National Capital Region; and
- 4. The Maryland State Highway Administration should coordinate with the National Bureau of Standards and the Commission right-of-way requirements on Federal land for the widening of MD924 and the construction of a ramp at the I-270/MD924 interchange.

A copy of the Executive Director's Recommendation, as approved by the Commission, is enclosed for your information.

Sincerely,

Reginald W. Griffith
Reginald W. Griffith

Executive Director

**RESPONSE:** 

Enclosure

Alternate 3 has been selected for initial construction with Alternate 2 for the ultimate. Coordination will be maintained with the National Bureau of Standards.

# **B. F. SAUL REAL ESTATE**

Investment Trust

8401 CONNECTICUT AVENUE, CHEVY CHASE, MARYLAND 20015

(301) 986-6000

RECEIVED

August 22, 1980

AUG 26 1980

Mr. Hal Kassoff, Director Office of Planning and Preliminary Engineering 300 West Preston Street Baltimore, Maryland 21201

DIRECTOR, OFFICE OF PLANNING & PRELIMINARY ENGINEERING

Dear Mr. Kassoff:

We have had an opportunity to review the suggested alternates for the Interstate Route 270 - Maryland Route 124 Interchange in Montgomery County.

We would like to support Alternate No. 3 with some suggested modifications. These modifications are in agreement with the City of Gaithersburg's recommendations which will be presented at the August 28th meeting. These modifications are:

- Referencing the suggested northbound exit ramp, we feel it would be advantageous to design a double ramp - such that users could turn left onto West Diamond Avenue. A double ramp would provide adequate stacking during periods of heavy use. We would also suggest a traffic light be proposed to facilitate users making this left turn.
- 2. We would also suggest that vehicular traffic be allowed to turn left and have egress to the suggested south ramp which provides ingress to I-270. The Muddy Branch study, and the proposed new bridge at Route 355, suggest that vehicular traffic flowing from these areas will proceed on West Diamond toward I-270.
- 3. We would also recommend that the ramp feeding into and incorporating Perry Parkway be reconsidered. This ramp has been included in both the State and City's master vehicular plan for many years, and would provide another reasonable means of ingress into the City of Gaithersburg.

Mr. Hal Kassoff August 22, 1980 Page 2

4. We find it very difficult to understand why any of these alternates would include the elimination of ramps at the intersection of I-270 and Montgomery Village Avenue. In the long run, the elimination of these ramps may prove necessary, but since they are already in place it is only common sense that they should be given a chance to work within these alternates. We strongly object to any ramp elimination at this time.

In conclusion, we support the recommendations brought forward by the City of Gaithersburg and call upon the State of Maryland to approve Alternate No. 3 with the addition of the suggested modifications. This appears to be the least expensive of a sorely needed improvement. We also urge that the State move with all possible haste to begin the work on these new installations.

Very truly yours,

Michael F. Johnson

Vice President - Real Estate

MFJ/cb

#### RESPONSE:

Alternate 3 has been selected for initial construction with Alternate 2 as the ultimate. See the following letter, dated September 9, 1980, from Mr. Kassoff to Mr. Johnson for explanations to comments 1 through 4. See the response to the Giant Food Inc. letter dated August 22, 1980 for a response to the comment concerning modifications to Alternate 3.

#### GIANT FOOD INC.

BOX 1804, WASHINGTON, D. C. 20013 (301) 341-4878

E. TILDEN KELBAUGH, JR. SENIOR VICE PRESIDENT REAL ESTATE AND CONSTRUCTION

August 22, 1980

Mr. Hal Kassoff, Director Office of Planning and Engineering State Highway Administration 300 West Preston Street Baltimore, Maryland 21201

> Re: I-270/Maryland 124 Interchange Montgomery County, Maryland

Dear Mr. Kassoff:

This letter is to inform you that we support SHA Alternate 3 with modifications as proposed by the City of Gaithersburg in reference to the additional interchange at I-270 and Maryland Route 124. We believe that this additional interchange will relieve the already congested existing interchange and create a more orderly flow of traffic in this general vicinity. This additional interchange is needed as soon as possible due to the increase in office building taking place in Gaithersburg including the General Electric Information Services Company corporate headquarters to be located near the Bureau of Standards.

Therefore, we hope you will act positively on Alternate 3 with the modifications proposed by the City of Gaithersburg.

Sincerely,

. Tilden Kelbaugh, Jr

Senior Vice President

ETK/mh

RECEIVED

AUG 28 1980

DIRECTOR, OFFICE OF PRANNING & PRELIMINARY ENGINEERING

#### RESPONSE TO GIANT FOOD, INC.:

Alternate 3 has been selected for initial construction with Alternate 2 as the ultimate. With reference to the modifications suggested by the City of Gaithersburg, it should benoted that they would require more extensive studies and funding which would either slow down implementation of the improvements significantly or delay the project indefinitely. Some of the problems the city's proposed modifications would encounter are greater impacts to existing local roads and development along these roads, the need to widen these local roads to serve the increased traffic with resulting greater impacts to adjoining development, and conflicts with Federal Highway Administration policies regarding Interstate access to local roads.



# Maryland Department of Transportation

State Highway Administration

James J. O'Donnell Secretary

M. S. Caltrider Administrator

September 9, 1980

RE: Contract No. M 971-151-372
Interstate Route 270/
Maryland Route 124 Interchange

Mr. Michael F. Johnson Vice President-Real Estate B. F. Saul Real Estate 8401 Connecticut Avenue Chevy Chase, Maryland 20015

Dear Mr. Johnson:

Reference is made to your letter dated August 22, 1980 indicating support for proposed Alternate 3 for improving the I-270/Maryland Route 124 interchange; also, your endorsement of various additional modifications suggested by the city of Gaithersburg.

Your comments are being forwarded to the Project Study Team and will be considered before a decision is made concerning this project. However, with reference to the suggested modifications, I would like to point out the following:

- 1. Any ramp modifications which would encourage additional traffic to use West Diamond Avenue would overload this road and the proposed improvements at the Maryland Route 355 intersection during peak traffic periods. Also, even with a double ramp, the recommended signal at West Diamond Avenue would most likely force traffic to back-up onto the Interstate mainline.
- 2. Widening of West Diamond Avenue between I-270 and Maryland Route 355 to accommodate increased traffic would heavily impact existing development along this road, and would require funding which is not likely to be available in the near future.
- 3. Any connection to Perry Parkway would also encourage additional traffic to use West Diamond Avenue to and from Gaithersburg. Also, previous discussions with the Federal Highway Administration regarding this proposed connection have revealed that they are opposed to this concept on the basis that Interstate Routes and Interchanges are not intended to directly feed into local street networks.

Mr. Michael F. Johnson September 9, 1980 Page Two

4. Should Alternate 3 be constructed, the decision on whether or not to close any of the corresponding existing ramps at the I-270/Maryland 124 interchange would probably hinge on whether or not traffic continued to queue onto the Interstate mainline. If this should happen, then the ramps would definitely be closed for safety reasons. Ultimately, should Alternate 2 be constructed, these two ramps would be removed since they are not included in the proposed interchange design.

Hopefully, the above helps to clarify the State's present thinking regarding this project. Thank you for making us aware of your recommendations. Via the project mailing list you will be kept aware of future developments.

Very truly yours,

Hal Kassoff, Director Office of Planning and Preliminary Engineering

HK: cmb

cc: Mr. Eugene T. Camponeschi (w/attach.)

Mr. C. David Feske



# Standard Federal Savings and Loan Association

481 North Frederick Avenue • Gaithersburg, Maryland 20760

MARVIN R. LANG PRESIDENT August 25, 1980

Phone: 840-8700

Mr. Hal Kassoff, Director Office of Planning and Engineering State Highway Administration 300 West Preston Street Baltimore, Maryland 21201

Dear Mr. Kassoff:

Please be advised that the main office of Standard Federal Savings and Loan Association, which is located at 481 North Frederick Avenue, Gaithersburg, (corner of Perry Parkway and North Frederick Avenue), is in favor of Alternate 3 with modifications for the new interchange at Montgomery Village Avenue and West Diamond Avenue, Gaithersburg, Maryland. We strongly support the City of Gaithersburg's position for improving the dangerous over-crowding of the I-270/Montgomery Village Avenue exit. We believe that the construction of Alternate 3 with modifications will alleviate the over-crowding of that exit northbound in the peak hours of the morning and evening, going to and returning from work.

If you have any questions, please do not hesitate to contact

RESPONSE: Alternate 3 has been selected for initial construction with Alternate 2 for the ultimate. See the response to the Giant Food Inc, letter, dated August 22, 1980 relative to the modification of Alternate 3 comment.

Very truly yours,

STANDARD FEDERAL SAVINGS & LOAN ASSOCIATION

Marvin R. Lang

President

RECEIVED

AUG 27 1980

DIRECTOR, OFFICE OF PLANNING & PRELIMINARY ENGINEERING

cc: Ms. Jennifer Russel

**MEMBER** 

MRL/ms

Enclosure

me.

m FSLIC
fedical Serves & Labor House Acc Corp.
Tour Serving: finance (c) 560, 000



INTERNATIONAL HEADQUARTERS

Marriott Drive Washington, D.C. 20058 John Bacanskas Vice President – Development 301/897-1264

August 28, 1980

Mr. Hal Kassoff Director Office of Planning and Engineering State Highway Administration 300 West Preston Street Baltimore, Maryland 21201

Dear Mr. Kassoff:

We understand that the State Highway Administration is proposing certain changes at the interchange of Montgomery Avenue and West Diamond Avenue.

Marriott Corporation will manage a hotel to be constructed in the vicinity of the southeast quadrant of Maryland Route 124 and I-270, and as an interested party does hereby express its support for scheme SHA Alternate 3 with modifications as proposed and supported by the City.

Sincerely,

John Bacanskas

JB/sjh

#### RESPONSE:

Alternate 3 has been selected for initial construction with Alternate 2 as the ultimate. See the Giant Food, Inc. letter dated August 22, 1980 relative to the modification of Alternate 3 comment.

## QUESTIONS AND/OR COMMENTS

Contract No. M 971-151-372 I-270/Md. Rte. 124 (Montgomery Village Avenue) Interchange Modifications

Combined Location/Design Public Hearing
'Thursday, August 28, 1980
South Lake Elementary School, Gaithersburg

16 m 19533 Addist 1951,80

	NAME: Montgomery County Chamber of Commerce c/o Laurence S. Courtney	_
PLEASE	ADDRESS: 622 Hungerford Drive, Suite 20	<del>-</del>
PRINT	CITY/TOWN: Rockville STATE: Maryland ZIP CODE: 20850	<del></del>
XX/We wi	vish to comment xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	ject.
	tgomery County Chamber of Commerce is extremely interested in the timely econor	
growth of	of Montgomery County. In order for Montgomery County to enjoy orderly and time	ely
economic	c growth, expansion of the highway systems to meet the master plan requirements	<u>s</u>
is essent	ntial. In order for industry and business to be attracted to Montgomery Count	у,
we must p	provide support facilities in the form of housing, recreation and the like.	In
order to	to provide housing and recreation, we must build the master plan transportation	
systems t	that will provide reasonable access to this needed residential development an	d
eliminate	ate the probability of a moratorium on much needed development resulting from o	ver-
crowded 1	d roads and highways.	
In	the interest of promoting economic development in Montgomery County, the	,
Montgome	mery County Chamber of Commerce urges the Maryland Department of Transportation	,
State Hi	lighway Administration to take meaningful and expeditious action to ensure the	
planning	ng, design and construction of the I-270/Maryland Route 124 (Montgomery Village	<u> </u>
Avenue)	) Interchange modifications. These modifications will lead to the betterment o	f
the I-27	270 Corridor and provide another small step forward to the alleviation of the	
transpor	ortation problems that now face Montgomery County and severely threaten growth	and
the econ	onomic well being of the County.	
	I am currently on the Mailing List.	
XX P	Please add my/our name(s) to the Mailing List.	
SHA 61.3	.3-9-35 (Rev. 10/10/79) DATE: 8/25/80	7

RESPONSE TO MONTGOMERY COUNTY CHAMBER OF COMMERCE C/O LAURENCE S. COURTNEY

Alternate 3 has been selected for initial construction with Alternate 2 for the ultimate. The project has been given a high priority by the Maryland Department of Transportation and will be kept on schedule to the fullest extent possible.

# The Montgomery County Agricultural Center, Inc.

16 CHESTNUT STREET GAITHERSBURG, MARYLAND 20760

PRESIDENT Thompson H. Butz 15330 Darnestown Rd. Germantown 20767 VICE PRESIDENT Harold Morris

26 N. Summit Ave. Gaithersburg 20760 SECRETARY

Hazel Staley 23520 Woodfield Rd. Gaithersburg 20760 **TREASURER** 

James Tessier 7011 Brink Rd. Laytonsville 20760 THREE YEAR DIRECTORS Robert Reall

13220 Lewisdale Rd. Clarksburg 20734 Diane Geary

107 Méem Ave. Gaithersburg 20760 Fred Lechlider 23200 Laytonsville Rd. Gaithersburg 20760

Steve Martin 16520 Comus Rd. Comus 20753

Norman Mills 1028 Quince Orchard Rd. Gaithersburg 20760 Fred Root

4724 Bolling Brook Pkwy. Rockville 20850 WO YEAR DIRECTORS

rank Allnutt P.O. Box 413 Barnesville 20703 Robert Gladhill 26550 Ridge Rd. Damascus 20750 Harold Morris

26 N. Summit Ave. Gaithersburg 20760 Mrs. Gladys King

22341 Goshen School Rd. Gaithersburg 20760 Mrs. Elsie Pyles Barnesville 20703

James Tessier 7011 Brink Rd. Laytonsville 20760 ONE YÉAR DIRECTORS

Thompson Butz 15330 Darnestown Rd. Germantown 20767

Robert Evans Box 182 Clarksburg 20734 Donald Hobbs, Jr. 9303 Gue Rd. Damascus 20750

Edward Mayne Vo. Ag. Dept Boonsboro High School Boonsboro 21713

Mrs. Charles J. Savage 19301 Goshen Rd. Gaithersburg 20760 Washington White, Jr. 22529 Wildcat Rd.

Germantown 20767 4-H REPRESENTATIVES Eddie Stubbs 16408 Henry Dr.

Gaithersburg 20760 erry Suddath 7373 Damascus Rd. Gaithersburg 20760 **TELEPHONE: 926-3100** 

September 9, 1980

Mr. Hal Kassoff, Director Office of Planning and Engineering State Highway Administration 300 West Preston Street Baltimore, Maryland 21201

Dear Mr. Kassoff,

I am in receipt of a letter from Charles E. Vaughn of DANAC Associates, Incorporated apprising me of the alternatives to interchanges at Montgomery Village Avenue and West Diamond Avenue in Gaithersburg, Maryland.

In his letter, Mr. Vaughan suggested that I write you a letter of support of the City's position in regard to the Montgomery County Agricultural Center, Incorporated being affected by the decision involving Montgomery Village Avenue and West Diamond Avenue.

On behalf of the Montgomery County Agricultural Center, Incorporated, I would like to go on record in support of the City's position pertaining to the proposed alternatives to interchanges involving the above mentioned avenues.

I would appreciate being apprised further of any decisions made that would involve relocation of the interchanges.

Sincerely,

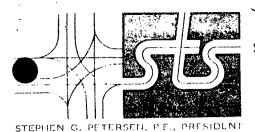
THOMPSON H. BUTZ

President

THB: mwm

RESPONSE: Alternate 3 has been selected for initial construction with Alternate 2 as the ultimate. See the Giant Food Inc. letter dated August 22, 1980, relative to the modification of Alternate 3 comment provided by the City of Gaithersburg.

PLANNING & PRELIMINARY ENGINEERING



STREET TRAFFIC STUDIES, LTD.

September 10, 1980

Mr. Hal Kassoff, Director Office of Planning & Preliminary Engineering Maryland State Highway Administration 300 West Preston Street Baltimore, Maryland 21201

> Re: Combined Location Design Public Hearing Interstate 270/Maryland 124 Interchange Montgomery County, Maryland

Dear Mr. Kassoff:

Since I was unable to attend the public hearing on the above referenced project on August 28, 1980 I would like to put my written comments in the record. The comments are based first on my observations as a citizen of the Gaithersburg area and secondly on the results of recent traffic studies I have conducted for a client who proposes to build office space along Clopper Road (the Thorpe Tract).

As a user of West Diamond Avenue, I-270 and I-270/Md.124 interchange I am well aware of the increasing congestion on I-270 as a result of the interchange deficiencies. Therefore, I believe the proposed improvements are important and should be constructed as soon as funding is available.

Based on my observations I would further urge that Alternative 3 be selected for immediate implementation with Alternative 2 to be staged as part of a continuing upgrading of I-270. My reason for recommending Alternative 3 for the W. Diamond Avenue ramps over Alternative 4 is to provide sufficient weaving distance between the ramp terminal and the Bureau of Standards Driveway at Firstfield Road. It is important from the point of view of the overall operation of the Md.124/Md.924 road network that the components of NBS traffic that would be served by the W. Diamond Avenue (Md.924) ramps be allowed to enter NBS from Md.924. appears that the ramp terminal in Alternative 4 would be too close to this intersection to permit such access to NBS thereby causing a major component of traffic from this large generator to remain in the Md.124/Md.924-Md.117 intersection. One objective of the new ramps should be to divert a portion of the traffic flow from this intersection.

Mr. Hal Kassoff September 10, 1980 Page Two

While Alternative 3 is best for Md.924, the proposal to close the two ramps at the existing interchange could also adversely affect the Md.124/Md.924-Md.117 intersection during this first stage improvement unless considerable improvements are also planned for this intersection. A more viable interim scheme would be to leave the ramps in place to serve the traffic component that has origins/destinations west on Md.117. This traffic will soon have a bypass to the above intersection in the form of an extension of Firstfield Road to Clopper Road (Md.117) as a city project. To make full use of this roadway improvement the existing I-270/Md.124 ramps could be useful for bleeding off a portion of the traffic that would otherwise be forced to use the Md.124/Md.924/Md.117 intersection if the ramps are closed thereby making better use of available capacity.

A copy of a memorandum report that I have prepared and which was submitted to the city is enclosed. This report was prepared for a 15 acre parcel on the south side of Md.117 west of Metropolitan Grove Road. The analyses do not take account of the change in distribution which would come about as a result of the new ramps but does show a redistribution of traffic due to the Firstfield Road extension.

The analysis shows that with restriping, the Md.124/Md.924-Md.117 intersection can be maintained at an E Level of Service when GEISCO and Thorpe and other development is completed. The opening of Firstfield Road also helps to balance morning peak hour conditions at the Md.124/Firstfield intersection. (Signal design plans are now being prepared for this intersection by our firm.) However, in the evening peak hour, without a change in the present road conditions an F Level of Service results because there is no advantage capacitywise to using Firstfield Road. My analysis suggests that this condition could be alleviated by extending the 56 foot wide pavement section on Md.124 north of Md.924-Md.117 through the Firstfield intersection and then running out the extra lane north of the Shell Station. For southbound traffic, a right turn lane between the SHA maintenance yard driveway and Firstfield Road would remove a substantial volume from the southbound through providing additional relief.

In my judgment, the Md.924 ramps are an important part of a first stage package of improvements required in the Md.124-Md.924-I-270 triangle but must be coupled with the following elements:

- a) Retention of the existing ramps at I-270/Md.124.
- b) Restriping the Md.124/Md.924-Md.117 intersection as suggested in Exhibit 5 of the attached report.

Mr. Hal Kassoff September 10, 1980 Page Three

c) Construction short sections of additional widening on Md.124 through the Firstfield Road intersection to provide three lanes northbound and a right turn lane southbound.

This package of improvements would, in my opinion, produce the time necessary to further evaluate traffic patterns by getting O-D data for trips into this area and to design further interchange and intersection improvements to meet the needs of the area.

Sincerely,

Stephen G. Betersen, P.E.

Pre**s**ident

SGP:bf Enclosures

#### **RESPONSE:**

Alternate 3 has been selected for initial construction, with Alternate 2 being implemented when traffic mandates.

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

September 12, 1980

8787 Georgia Avenue • Silver Spring, Maryland 20907

Mr. George W. Grandy, Jr. Project Manager Bureau of Project Planning Room 403, State Highway Building 300 West Preston Street Baltimore, Maryland 21201

### Dear George:

We wish to make the following comments regarding the location/design of the Interstate 270/Maryland 124 interchange. As you are aware, we have submitted comments previously on this project regarding areas of possible environmental sensitivity and consistency with overall county plans.

Our Environmental Planning Division has reviewed the Environmental Impact Assessment and has developed the following remarks:

#### "Recommendations

Alternative 2/3 is preferred if a build alternative is selected. Further study is needed to:

- evaluate aesthetically desirable noise abatement alternatives (berm, with a low wall and plantings) for Sites\_3,5, and Londonderry; and
- re-evaluate carbon monoxide impacts for worst case meteorology (cold weather temperatures) and specify distances used (should be nearest residential units).

#### "Water Resources

Alternatives 2/3 and 2/4 both involve construction in the 100 year floodplain of Long Draught Creek. Alternative 2/3 disturbes less area (4.4 acres), and is preferred over alternative 2/4 (5.8 acres).

In either case, it is assumed that normal state and county stormwater and stream protection requirements will be met. Where possible, it is preferable to have bridges that span the floodplain and to minimize clearing and grading near the stream.

#### "Noise Levels

2

The report states that further studies of Site 5 will be conducted, but that an exception may be sought to barrier construction due to aesthetic consideration. The responsibility for mitigating noise impacting on Site 1 is not clearly stated.

The facility will lead to undesirable increases in noise levels at two or more residential locations in the area. Noise levels at Site 3 and Site 5 exceed 65 dBA and increase over existing levels by 8 dBA and 5 dBA respectively. The levels (for build alternatives) are 68 dBA (Site 3) and 74 dBA (Site 5). Residential uses between Site 5 and Muddy Branch Road ("Londonderry") were not even evaluated. A recent report\* issued by the U.S. Department of Transportation (and others) identifies levels exceeding 65 dBA as being a significant exposure to noise.

The abatement alternatives stated in the report should be evaluated for Sites 3,5 and for Londonderry, including one which emphasizes aesthetics (i.e. a berm with a low wall and plantings). The State has already expressed its intentions to construct a noise barrier for townhouse units south of I-270 and east of Muddy Branch Road in the same general area. There should be consistency in the evaluation and provision of noise barriers in the area. The residents of these residential areas should be fully consulted prior to final noise abatement decisions.

Alternative 2/3 places an exit ramp further from residents at Site 5 and is therefore preferred over Alternative 2/4.

<sup>\*</sup>Federal Interagency Committee on Urban Noise, "Guidelines for Considering Noise in Land Use Planning and Control", May 1980..



## "Air Quality

5

6

The report summarizes the results of a draft air quality analysis. No violations are predicted for 1985 and 2005. However, the following is noted concerning the analysis.

- Worst case meteorology was not used. CO emissions are less during warm weather (75° F assumed). 39° F has been used by COG and ourselves to represent ambient winter temperatures when CO emissions are greatest.
- The specific distance of the receptor to the CO source is not given. Since CO disperses with increased distance, it is essential that CO levels be calculated for the nearest residential units.

These items prevent us from concurring that no violations may occur with any of the alternatives."

Regarding the intersection improvement contained in the April 1980 SHA report entitled "Justification for Reconstruction of I-270/MD 124 Interchange in Montgomery County, Maryland," we note that the critical lane volumes for the Rte. 124/117 intersection calculated in figure 4 using projected 2005 traffic fall within our D/E LOS range. However, we question carrying only two Rte. 124 southbound lanes through the intersection when there are three lanes for through movement on the northern approach. The Rte. 124/117 intersection improvement shown in figure 5 associated with alternatives 2,3, and 4 results in a critical lane volume calculated to fall within the LOS E range.

In our review of this intersection in connection with the GEISCO preliminary subdivision plan, we determined that the intersection of Rte. 124/117 (with the intersection improvement recommended in that study) would operate at LOS "C" when full use were made of the programmed Great Seneca Highway. We recognize that our analysis included only existing and platted traffic as compared to projected 2005 traffic, but we mention this point because the scope of the intersection improvement in the Interchange Report

differs from that presented in the GEISCO consultant analysis. Since Route 124 construction improvements are included in the County's 1981-1986 adopted CIP (with SHA participation), we assume that provisions for staging intersection improvements required to accommodate projected traffic volumes along with access to major employers (NBS, GEISCO, Quince Orchard Plaza) will be considered when an alternative is selected.

Thank you for the opportunity to present our comments.

Sincerely,

Robert M. Winick, Chief

Robert M. Wind

Transportation Planning Division

RMW:CH:bap

cc: Don Downing

Gerald Cichy

Alternate 3 has been selected for the initial construction, with Alternate 2 as the ultimate.

- 1. Drainage and storm water control would be incorporated into the construction activities of the project. Care would be taken during construction to prevent signficant siltation or other blockage of local drainage ditches, pipes, culverts, etc. Sediment traps would be utilized to trap sedimentladened water before it leaves the construction site.
- 2. The feasibility of a noise barrier will be further analyzed during the final design of the selected alternate. Current studies indicate that to be effective a barrier would have to be exceedingly high (30 feet) which would block the general view of the residences and would be aesthetically unpleasing. A combination berm and barrier at this location would not be practical because of the limited space available between the proposed collector-distributor road and the noise sensitive area.

Partial abatement measures, such as landscaping, will be investigated during final design. Any landscaping implemented will be done only after coordination and consultation with surrounding land owners.

If noise mitigation is warranted at Site 1 it would be the responsibility of the State Highway

Administration to implement the mitigation measures. Partial mitigation in the form of landscaping will be considered at this site. Site 1 is an undeveloped park. A copy of the noise report will be sent to the owners of the park for their use in planning park activities.

- 3. The noise analysis was completed in accordance with Federal-Aid Highway Program Manual 7.7.3 That manual establishes specific noise levels that have to be considered when analyzing the impact of a highway on the surrounding land use. The technical noise analysis prepared satisfies all requirements of FHPM 7.7.3. Noise Sensitive Areas closet to the facility were selected for analysis.
- A. Equal consideration will be given to all areas where noise mitigation may be required. A variety of factors are considered when determining the viability of noise mitigation. Some of these factors include cost, size of barrier, effectiveness of barrier and number of noise sensitive locations affected. It is the policy of the State Highway Administration to consult and coordinate with affected property owners prior to the selection of appropriate mitigation measures.

- 5. The technical report was revised to use 39°F. There are no violations of the National Ambient Air Quality Standards using that temperature. A copy of the report will be sent to MNCPPC. The distance to each sensitive receptor was also added to the report.
- 6. There is currently only two through lanes on Md.

  Route 124 on the northern approach. The proposed improvement will have two through lanes with a left turning lane.



#### OFFICE OF ENVIRONMENTAL PROGRAMS

## DEPARTMENT OF HEALTH AND MENTAL HYGIENE

201 WEST PRESTON STREET • BALTIMORE, MARYLAND 21201 • Area Code 301 • 383-3245

Harry Hughes, Governor

Charles R. Buck, Jr., Sc.D. Secretary

February 17, 1981

Mr. Richard S. Krolak, Chief

Environmental Management

Bureau of Project Planning (Room 404)

State Highway Administration

300 West Preston Street

Baltimore, Maryland 21201

Dear Mr. Krolak:

RE: Contract No. M 971-151-372 F.A.P. No. F 120-1 (1) I-270/Maryland Route 124 Interchange Montgomery County

We have reviewed the Draft Air Quality Analysis for the above subject project and have found that it is not inconsistent with the Administration's plans and objectives.

Thank you for the opportunity to review this analysis.

The Clean M. Bonto- Ruch

William K. Bonta, Chief

Division of Program Planning & Analysis

Air Management Administration

WKB: bab