



CARDEROCK SPRINGS
National Register of Historic Places

June 12, 2019

Governor Larry Hogan
100 State Circle
Annapolis, Maryland 21401-1925

Administrator Gregory Slater
Maryland State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202-36-01

Subject: Comments about alternatives retained for detailed study & concerns about planned Beltway expansion

I am the President of Carderock Springs Citizens' Association (CSCA) and write on behalf of the Carderock Springs community, a historic community located adjacent to the west side of Interstate 495 (the Beltway) and Carderock Springs South, a community located adjacent to the east side of the Beltway.

Our community was very disappointed to learn at the SHA public workshop on April 13, 2019 that despite our previous comments submitted to SHA on April 30, 2018 and October 1, 2018, SHA selected Alternatives that would add two lanes in each direction. As we have previously stated, adding 2 lanes in each direction would reduce the distance between the lanes of the Beltway where vehicles will travel and school and residences, resulting in increased noise and dangerous air pollution. That means, contrary to Governor Hogan's earlier promises to keep the Beltway expansion within the right-of-way (ROW), our community was shocked to learn on April 13 that:

1. Many homeowners might be losing parts of their yards (at least temporarily) should the alternatives that will be adding two lanes each direction be chosen. As previously noted in our comments, Carderock Springs has been designated a National Historic District that is listed in the National Register of Historic Places. A greater level of analysis and limitations on decision-making under Section 106 of the National Historic Preservation Act and Section 4 (f) of the Department of Transportation Act is warranted. Taking away these properties is not acceptable.
2. Traffic will be much closer to the Carderock Springs Elementary School (CSES), with a large area of the school and field exposed to noise of more than 66 dB and harmful pollution. In addition to previously cited research confirming the harmful effect of highway pollution on children's lung development, we also note that CSES has three classrooms for children with autism. Children on the autism spectrum are extremely sensitive to noise and we believe that their needs should be part of the on-going analysis of the ARDS and possible remediation if I-495 is expanded. Thus, not only will the effects of a beltway expansion be felt within a

Carderock Springs Citizens' Association
P.O. Box 237, Cabin John, MD 20818-0237

www.carderocksprings.net

**L&B 7550828v1/09999.0357

sensitive population, but such effects will be felt by a sensitive population *within a sensitive population*. Action must be taken to mitigate noise impacts at this location.

3. Elevated ramps over the Beltway linking managed lanes and River Road are also included as part of the ARDS, which will expand significantly the area negatively affected by noise and air pollution. Placing such elevated ramps in a residential area is, to our knowledge, an approach that has been rejected in all other jurisdictions as its negative effect is multiplied.

While our concerns are closely linked to the adverse effects that expanding the Beltway would have on our community, we share the views expressed by Montgomery County and others requesting the environmental, fiscal, and traffic impacts of proposed plans. Alternatives 8, 9, 10, 13B and 13C will, according to the very preliminary analysis provided in the Managed Lanes Study, have unacceptable impacts. We request that SHA assesses more carefully and comprehensively traffic patterns than it has up to now as it plans road expansion.

CSCA therefore requests that the SHA's environmental review and EIS specifically include the following:

- Conduct a new noise impact study to serve as the current baseline to measure the current level of Beltway noise in the vicinity of Carderock Springs given increased traffic over the last 17 years. If this study shows that current noise levels require a noise wall as abatement, any project alternative selected, even if limited only to traffic control measures, should include the building of a noise wall to specifications designed to ensure significant noise reduction.
- The traffic data used for the noise study to project future conditions should be conservative and be based on worst-case-scenarios in order to obtain true and correct traffic projections, both to determine the need for managed lanes, and to project actual traffic noise and emissions.
- In conducting the air pollution impact study to measure the current and projected levels of Beltway air pollutants in the vicinity of Carderock Springs, the health impacts of those current levels of pollutants, and the need for mitigation, the study must recognize and take into account the proximity of CSES and its athletic fields to the Beltway, and the potential for traffic to be even closer to these sensitive receptors if the ROW is expanded or if travel lanes are brought closer to the outside boundaries of the existing ROW.
- Evaluation of eligibility of Carderock Springs for Type I abatement under both existing conditions and future conditions.
- Include as a component of the alternatives (not as potential mitigation) a solid noise barrier along both sides of the Beltway in the vicinity of Carderock Springs
- Establish an I-495 & I-270 Community Working Group for community members, including Carderock Springs representation to actively participate in the development of the Draft Environmental Impact on I-495 & I-270 Managed Lanes Study and in any Section 106 Programmatic Agreement or

Governor Larry Hogan
Administrator Gregory Slater
June 12, 2019
Page 3

Memorandum of Agreement, so the input and comments of these important stakeholders can shape SHA's further planning, review, design, and mitigation, rather than having these uniquely-situated stakeholders being relegated to participating only in the post-Draft Environmental Impact Statement public comment period.

We trust that you will seriously consider these comments.



John Orrick
President, Carderock Springs Citizens' Association

cc: Marc Korman, Delegate, District 16
Sara Love, Delegate, District 16
Susan Lee, Senator, District 16
Andrew Friedson, Councilmember, Montgomery County
Jack R. Smith, Superintendent, Montgomery County Public Schools

Carderock Springs Citizens' Association
P.O. Box 237, Cabin John, MD 20818-0237
www.carderocksprings.net

**L&B 7550828v1/09999.0357