



CARDEROCK SPRINGS
National Register of Historic Places

March 3, 2021

Steve Archer
Cultural Resources Team Leader
Maryland Department of Transportation State Highway Administration
Environmental Planning Division
707 North Calvert Street
Baltimore, MD 21202

RE: I-495/I-270 Managed Lane Study Programmatic Agreement Development

Dear Mr. Archer:

The Carderock Springs Citizens Association (CSCA) has followed the I-495/I-270 Managed Lanes Study environmental process closely and has been pleased to participate as a Consulting Party in the Section 106 consultation process. We understand that MDOT SHA recommends that a modified Alternative 9 be identified as the Preferred Alternative in the FEIS and that there will be an online/virtual meeting to discuss advancing Programmatic Agreement development on March 10, 2021. This letter provides a summary of our central concerns related to the process of developing the Programmatic Agreement as well of the impacts and effects of the Project on the Carderock Springs community, many of which have been discussed in greater detail in our previous responses to the DEIS and the Draft Cultural Resource Study, and which we feel need to be addressed as part of Programmatic Agreement.

We have concerns about the current level of information regarding the Programmatic Agreement and the process ahead. The opportunity for Consulting Parties to have meaningful input into the process is not explained, and the proposed processes to avoid and minimize impacts are similarly not described. Our community needs more clarity on the proposed next steps to address these, and other issues, in the Programmatic Agreement. We hope that the meeting next week can begin to clarify this process.

In order to be able to evaluate the proposed preliminary design and its impact on our community fully, we will require additional information on the modified Preferred Alternative 9 to confirm any adjustments made in response to comments from stakeholders. As part of the Section 106 process, we understand that we should have sufficient information for design review and to help

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suggest context-sensitive approaches to design around Section 106 resources. Specifically, we are interested in the following issues:

Impacts to Setting and to Property

Carderock Springs is designated as a National Historic District as a notable example of “situated modernism,” and Carderock Springs South is indicated in the *Cultural Resources Technical Report* (Appendix G) as an eligible historic district. The *Report* (Appendix G) identifies that the potential adverse effects to Carderock Springs Historic District cannot be fully determined (Table 3-2), while acknowledging that the Project “may result in loss of tree and landscape buffer that could create a diminishment of the design and setting of contributing elements of the district” (Pg. 27). We believe that this loss *would* have an adverse effect as trees are a character-defining feature of the Historic District. Avoidance measures must be taken to reduce the number of trees affected by the Project and these measures should be documented in detail in the Programmatic Agreement.

In addition, the LOD indicated on the Environmental Resource Mapping (DEIS Appendix D) appears to be overly optimistic with noise barriers being located essentially at the LOD limit. At the current level of planning, at least 10-15 feet of LOD should be assumed, in order to capture potential slope and grading issues. This may result in additional potential for property takings and additional tree loss in these areas. We request that SHA review the appropriate LOD in this corridor and provide further documentation of whether the indicated LOD is reasonable and attainable. Where property impacts are shown, particularly along Thornley Court, Hamilton Spring Road, Stone Trail Drive, and on the Carderock Springs Elementary School property, the Final EIS should include, as mitigation, the direction that SHA take practicable steps to eliminate the need for property acquisition in this section of the Project.

Noise Analysis and Barriers

Our community is particularly concerned about noise impacts associated with the Project. Past promises to provide barriers along I-495 in our vicinity have not been kept. The noise barrier design should be advanced to provide sufficient information to our community about the location, height, grading, tree takings, design and acoustical effectiveness of the noise barrier and should incorporate “barrier optimization guidance” to provide adequate information to the P3 contractor to design and build an acceptable noise barrier. The noise study should also evaluate whether noise barriers would be appropriate along the MD 190/Clara Barton Parkway entrance ramp on the west side of I-495, and whether the change in the nature of that ramp to an elevated flyover of the roadway may alter the noise impacts to the detriment of those who live along Seven Locks Road.

The design, placement, and aesthetics of the noise barriers must be considered as part of the mitigation process in relation to their compatibility with the design character of the neighborhood. The proximity of a large wall to existing homes, when combined with potential tree loss, could have a negative visual impact on properties and should be addressed through design refinements committed to in the Final EIS. The statement of likelihood provided in the Draft EIS does not address whether and how further analysis of the feasibility and reasonableness of the barrier extension will be conducted during the final design of the project given that it is expected to be procured using a

public-private partnership (P3) project delivery. The construction of an appropriate noise wall must be committed to as a mitigation in the Final EIS and Record of Decision and incorporated into the P3 Concessionaire's designs with the cost of the wall included within the construction budget at no cost to the community.

River Road Flyover

While we understand that transportation engineering arguments for this flyover ramp may exist, there are other sensitive areas where at-grade exits from the toll lanes have been chosen, including at Clara Barton Parkway. We request that a similar accommodation at River Road be considered and fully evaluated even if it is less desirable from an engineering perspective. In addition to the noise study noted above, a Visual Impact Assessment for the flyover ramps should be performed to understand better the visual impacts of the raised roadway. We believe that the use of elevated flyover ramps in a primarily residential community, as opposed to a commercial area such as Tysons Corner, will have a detrimental impact on the esthetics of the neighborhood and depress property values.

Traffic and Construction Impacts

The *Environmental Resource Mapping* (DEIS Appendix D) appears to indicate replacement of three bridges in the vicinity as well as substantial reconstruction of the MD 190/I-495 interchange (Exit 39). The Final EIS should provide more information regarding the construction-period impacts on Persimmon Tree Road, Seven Locks Road, and MD 190. As mitigation for the expected disruption, any impacts to these roadways should be mitigated through appropriate construction communication and coordination activities documented in a Construction Management Plan.

The *Traffic Analysis Technical Report* (DEIS Appendix C) indicates impacts to local roadways in the vicinity of Carderock Springs (Figure 5-73). According to the information provided, both River Road (MD 190) and Clara Barton Parkway would see a greater than 10% increase in delay due to the implementation of two managed lanes. This increase in delay represents a major adverse impact for Carderock Springs and are not documented in the Draft EIS. Rather, the Draft EIS only notes the regional positive impacts to local road traffic (Pg. 4-17). The impacts to these local roads must be further discussed in the Final EIS and must be mitigated, either through improvements to these roadways or policies to reduce their levels of traffic congestion.

Alternatives Analysis

Due to the impacts that the Project would have on our community, both during the operational and construction periods, Carderock Springs Citizens Association is unable to support Alternative 9, which adds two lanes in each direction to I-495 in the vicinity of our community. We continue to recommend that the State Highway Administration (SHA) re-evaluate the Purpose and Need for the Project, and alternatives in light of the fundamental shifts in travel demand due to COVID-19 and work from home trends. Should the Project move forward, we would see Alternative 5 as a viable compromise approach that could ease some of our concerns about the detrimental effects of this

Project. These fundamental issues with the analysis of the alternatives must be addressed in a Supplemental Draft EIS that should affect how SHA seeks to make a decision in this project.

Thank you for your consideration of our community's comments and concerns. We look forward to learning more about the Programmatic Agreement process during next week's meeting.

Sincerely,



Jack Orrick
CSCA President