



**CARDEROCK SPRINGS**  
National Register of Historic Places

April 12, 2021

**VIA EMAIL**

Larry J. Hogan, Jr., Governor ([governor.mail@maryland.gov](mailto:governor.mail@maryland.gov))  
Peter V.R. Franchot, Comptroller ([pfranchot@comp.state.md.us](mailto:pfranchot@comp.state.md.us))  
Nancy K. Kopp, Treasurer ([nkopp@treasurer.state.md.us](mailto:nkopp@treasurer.state.md.us))  
Maryland Board of Public Works ([bpw@maryland.gov](mailto:bpw@maryland.gov))  
Louis L. Goldstein Treasury Building  
80 Calvert Street  
Annapolis, MD 21401

**Re: I-495/I-270 Phase P3 Agreement - Stakeholder Recognition Request for CSCA;  
Impacted Community Peer Review Cost Reimbursement Request**

Dear Governor Hogan, Comptroller Franchot, and Treasurer Kopp:

The Carderock Springs community is one of several neighborhoods in Montgomery County that are directly adjacent to I-495 and, as such, we will be disproportionately impacted by the I-495 Managed Lanes Project. Carderock Springs has been designated on the National Register of Historic Places and is a Consulting Party in the NHPA Section 106 Process. We continue to have serious concerns regarding the Project planning, the effects on our historic neighborhood, and the long-term implications for our community. As you consider the approval of the P3 Agreement, we request that you (1) include Carderock Springs Citizens Association as a stakeholder in the I-495/I-270 Managed Lanes Project upcoming design phase, (2) provide direction to the P3 Developer to seriously explore design alternatives for the managed lanes at the MD 190 interchange and for access to the Cabin John Parkway, and (3) provide resources for communities like ours to engage consultants to assist us in responding to the NHPA Section 106 process and commenting on design proposals for the Project.

**Stakeholder Status:** Carderock Springs Citizens Association, on behalf of the residents of Carderock Springs and Carderock South, Montgomery County, Maryland, hereby requests to be recognized as a concurring party for the I-495/I-270 P3 - "Phase I South" Managed Lanes Project for the purposes of providing design input and actively participating in consultation with MDOT SHA and the Phase I South P3 Contractor during the design process, including the pre-development design process.

We understand that the Phase P3 Agreement requires the Developer to actively engage "stakeholders." Further, we note that the Developer is being selected by the Board of Public Works prior to the completion of the NEPA environmental impacts analysis and NHPA Section

106 process, and much work remains to be done in order to evaluate the comments provided by us and other affected communities to the Draft Environmental Impact Statement issued last fall and ultimately arrive at a design for the Project. In our role as stewards of the Carderock Springs Historic District, we have been a Consulting Party to the Section 106 process and will be seeking Concurring Party status under the Programmatic Agreement. Our entire neighborhood is affected by the Project on subjects that extend beyond the purview of Section 106. Therefore, we are very interested in this official designation so that we can work directly with the Phase P3 Contractor to better understand the range of issues on which the P3 Project will impact our community, and to work collaboratively to reach some mutually acceptable design options that will best protect our community.

**MD 190 and Cabin John Parkway Interchange Design:** We remain very concerned that the Project includes multiple flyover ramps connecting the proposed managed lanes with the MD 190/Cabin John Parkway interchange. These multiple levels of elevated ramps are out of character with our residential community and the residential (non-commercial) nature of the surrounding area, threaten to harm property values and quality of life, and are not needed to meet the Project's goals and to provide local access. We request that the Board require the P3 Developer to further evaluate alternative strategies at this location, such as on-grade access to the managed lanes.

**Concerns about Noise Barriers and the LOD:** As the current version of the MDOT I-495 and I-270 Managed Lane Study Interactive Map indicates that the extent of the indicated Limits of Disturbance will be extended to the border of the property lines of many properties in Carderock Springs, and that noise barriers are to be constructed at the edge of the indicated LOD, we are concerned about whether the final design of the Project will maintain the actual LOD within the public right-of-way and still provide for tree preservation and placement of noise barriers along this right-of-way without encroachment onto private properties. We note that there have been recent alternative proposals advanced on the location of the Project in order to mitigate the impacts on the Moses Hall Cemetery that appear to have the effect of shifting the roadway to the northwest from the location indicated on the interactive map published in June 2020.

**Community Support:** Furthermore, given the significant resources being devoted by the State and the contracting parties to this Project, the community as a party to this effort will need to do its fair share of work as well. Accordingly, it has been necessary for us to contract subject matter experts for peer review of, and assistance with, such design consultation, and for consultation related to the NHPA Section 106 process. Since our community, as well as other disproportionately impacted communities, will in fact bear costs directly related to this State supported Project that other taxpayers will not, we also respectfully request that the Board of Public Works stipulate that a small portion of the Project's pre-development funds that the Phase P3 Developer has agreed to reimburse the State for costs related to the Project be dedicated to reimburse our and similar communities, for actual costs we will bear associated with i) the peer review that we have incurred to submit substantive comments to the DEIS, ii) the anticipated



expert fees necessary for design consultation, and iii) the anticipated expert fees necessary for as to meaningfully participate as consulting parties in the Section 106 process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jack Orrick".

Jack Orrick, President  
Carderock Springs Citizens Association  
Email: [jack.orrick@offitkurman.com](mailto:jack.orrick@offitkurman.com)

cc: John Gontrum, Executive Secretary- [John.gontrum@maryland.gov](mailto:John.gontrum@maryland.gov)

County Executive Marc Elrich

Councilmembers Andrew Friedson, Gabe Albornoz, Evan Glass, Will Jawando, and Hans Riemer

Senator Susan Lee and Delegates Ariana Kelly, Marc Korman, and Sara Love

Carol Rubin, Maryland National Capital Park and Planning Commission

Rebecca Ballo, Montgomery County Planning Department