



CARDEROCK SPRINGS
National Register of Historic Places

April 14, 2022

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 and I-270 Managed Lanes Study, Comments from CSCA about Section 106 Materials and Draft 3 of the Programmatic Agreement

Dear Mr. Archer,

Thank you for the opportunity to provide you with our comments, as a Consulting Party to the NHPA Section 106 process, to Draft 3 of the Programmatic Agreement and the accompanying letter dated March 31, 2022.

Consistent with our previous comments to the SHA, we continue to disagree strongly with SHA's determination that the project will not adversely affect the Carderock Springs Historic District (CSHD) and with SHA's previous statement that "these actions will not disturb the original topography and natural vegetation within Carderock Springs." We assert that there will be visual, atmospheric and audible effects as a result of the Project. We have summarized our previous comments below and have provided additional comments based on the latest information provided:

Noise barriers

We agree that, should the Preferred Alternative, or any Alternative for that matter, move forward, that noise barriers be included in the design to reduce the noise levels in the properties bordering the Beltway. Given the history of previous commitments to provide noise barriers falling through, we expect a new commitment from SHA to provide noise barriers adjacent to CSHD and Carderock Springs South as part of the Project.

Due to the architectural character and natural setting of CSHD, we continue to request that careful consideration should be given to the appropriate design and materials for the noise barriers to provide a context-sensitive design. We do not agree with SHA's response that a "standard noise barrier would not be incompatible with the Carderock Springs Historic District." As a precedent, we are aware that the National Register listed Fairlington community in Arlington also had an agreement with FHWA and VDOT several years ago as part of that managed lanes/hot lanes project and received a context-sensitive design. We are asking for similar treatment as Fairlington



received. The PA includes language regarding context-sensitive design considerations for the George Washington Memorial Parkway, the C&O Canal, and the Morningstar Tabernacle No. 88 Moses Hall and Cemetery, and opportunities for review and comment regarding the design. We request that similar language be included for our community.

Tree canopy / buffer zone

The current Limits of Disturbance (LOD) border the CSHD and the Area of Potential Effects (APE) extends into the CSHD and Carderock Springs South. As noted previously, in addition to the CSHD's significance under Criterion A, it is also significant under Criterion C "for its distinctive examples of modernist houses in a carefully planned and landscaped development designed to have a 'natural' appearance by retaining most of the original vegetation and topography." This original vegetation includes large areas of mature trees, including in the areas bordering the Beltway, which contribute to the visual aesthetic and also provide an additional measure of noise damping. The LOD includes a ten-foot offset behind the proposed noise wall, which will undoubtedly affect the mature trees that are either directly within the LOD or whose root systems extend into the LOD, and any other existing landscape buffer within the LOD.

We understand that MDOT SHA is obligated to provide reforestation mitigation for the Project pursuant to the Maryland Reforestation Law and that reforestation must occur within 2 years or 3 growing seasons of completion of construction. However, per SHA's responses to our previous comments regarding reforestation, "the developer should avoid and minimize impacts to forest within the ROW and replant within the ROW to the extent practicable." If construction activities and installation of the new sound barriers affect tree roots within the LOD that belong to trees that are not within the ROW but rather within the boundaries of the adjacent private properties, we expect that SHA will make a commitment to reforest those boundary areas as well should those trees be adversely affected by the Project.

Fly-over Ramps

We understand that the current design incorporates fly-over ramps in several locations to allow traffic to access the managed lanes. We have reviewed the on-line interactive map for the MLS which indicates locations of fly-over ramps in plan and believe we have identified several fly-over ramp locations adjacent to the CSHD and Carderock South, including southeast of the Carderock Springs Elementary School near Carderock South and at the Cabin John Parkway / River Road (MD 190) interchange. Since elevations and/or three-dimensional renderings of these ramps are not currently available, we cannot fully evaluate their overall visual impact; however, given that the current elevation of the Beltway is fairly level with the school fields and yards of the Stone Trail / Tomlinson Avenue / Osage Lane houses, it would appear that the presence of one of these raised structures would have a dramatic visual and sound impact.

We continue to recommend lowering the ramps, or allowing on-grade access to the managed lanes, to avoid both visual and audible negative impacts. It remains unknown what further impacts there may be from the placement of new signage for these entrance ramps, and their placement relative to the viewshed and property lines of the community and residential streets. Further



information and consultation is requested as the project continues past the ROD so that CSHD will be consulted on these items to assess any as yet undefined visual impacts.

Atmospheric Effects

To date we have not seen a discussion of potential atmospheric effects, including air quality for the homes directly adjacent to the Beltway and at the Carderock Springs Elementary School. We request that air quality issues be addressed and discussed as part of the review process.

Programmatic Agreement

Without the determination of adverse effects, it appears that no specific language is currently included for Carderock Springs in the Programmatic Agreement.

1. As a Consulting Party, we request that the following language be added to the PA:

MDOT SHA will continue property-specific Design-Review consultation with Carderock Springs Citizens Association to ensure a context-sensitive design for new facilities, and, through the ongoing design process, minimize, to the extent practicable, impacts to character-defining features and resources that contribute to the Carderock Springs Historic District as a historic property. Key elements for CSCA review include the noise barriers, fly-over ramps, signage and lighting. MDOT SHA will provide CSCA a comment opportunity on plans at a draft level of design and a second opportunity prior to finalization of design for elements within the APE adjacent to property within the Carderock Springs Historic District; for each review there will be minimum 30-day review period. In the event of objections relating to the final design from CSCA that cannot be resolved, MDOT SHA and FHWA will follow Stipulation XIII of this PA.

2. We also request that language be added to the Programmatic Agreement regarding specific reforestation commitments both in the ROW and in the bordering areas within the private properties where tree roots and therefore adjacent mature trees are affected by the Project.
3. We request that the Programmatic Agreement allow for continued consultation should any unexpected discoveries or changes to the design be found necessary within the portion of the APE adjacent to CSHD and Carderock South.

The name and title of the person to sign for our consulting/concurring party is as follows:

John Orrick

President, Carderock Springs Citizens Association



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Thank you for consideration of these comments.

John Orrick

President, Carderock Springs Citizens Association

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4857-1922-3836, v. 1