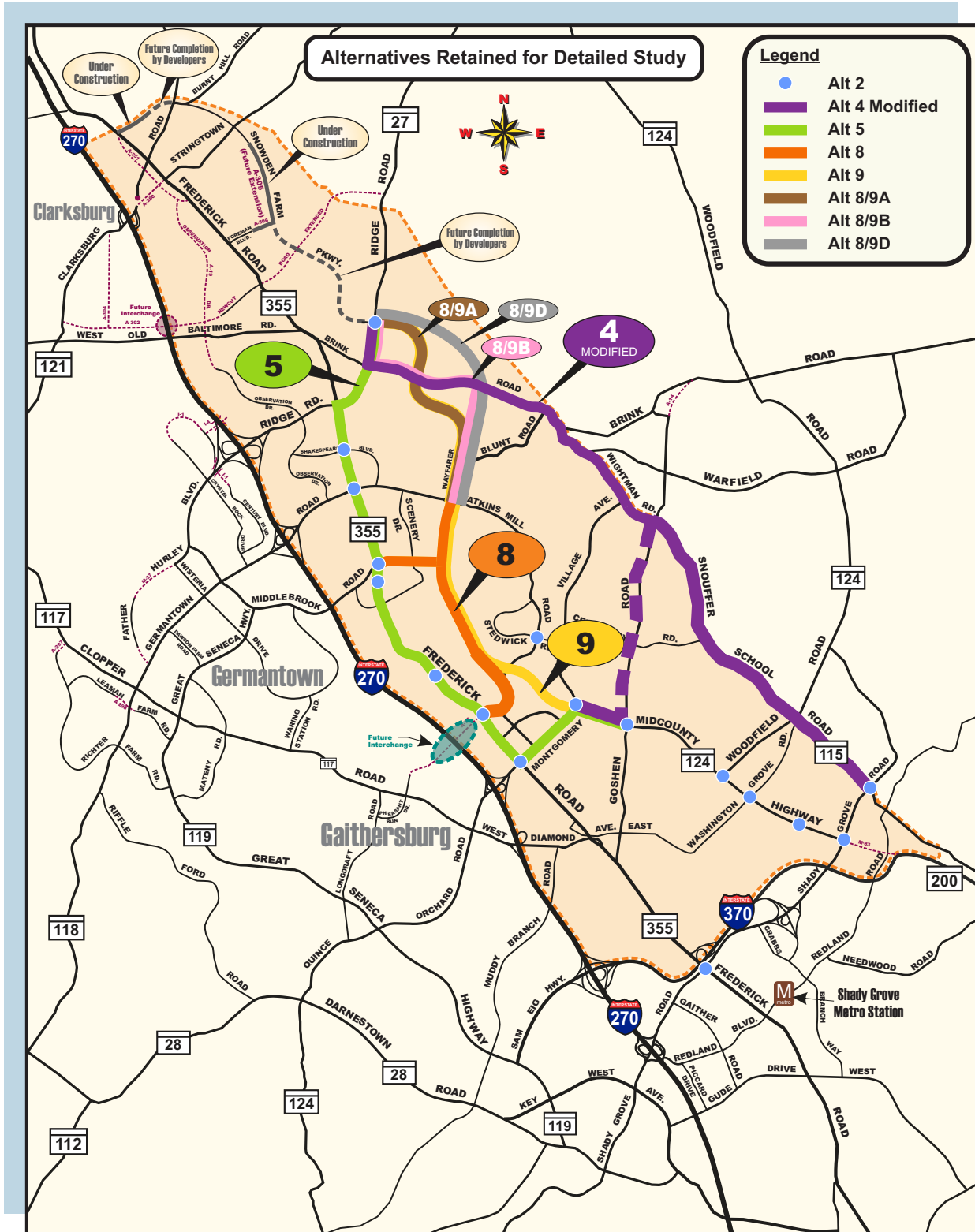


ADDITIONAL IMPACT ANALYSIS SINCE THE DRAFT EER





V. ADDITIONAL IMPACT ANALYSIS SINCE THE DRAFT EER

As is customary on project planning studies, analysis of the alternatives has continued since the circulation of the *Draft EER*. Impacts have been further quantified and refined during agency coordination and in response to comments from the public. Following is a summary of these additional studies.

A. Parks and Forest

Many of the parcels that currently comprise the North Germantown Greenway Stream Valley Park located south of Brink Road were purchased by the County in the late 70s and early 80s, after the roadway alignment was adopted in the County's Master Plan of Highways in the 1960s (**Figure V-1**). Aerial photography from 1979 (**Figure V-2**) shows that a significant portion of this current parkland was being utilized for agricultural practices prior to its purchase by the County. However, after the land was incorporated into the County's park system, the area was allowed to naturally regenerate into woodlands (**Figure V-3**).

The 1979 aerial photo shows that agricultural land uses and immature forest dominated the land use along the Alternative 8/9D alignment, while the mature forest was limited to a portion (the dark shaded areas) of the Alternative 8/9A alignment running parallel to Dayspring Creek. Field review recently performed for the Draft EER confirmed that the more mature forests and higher quality natural resources are located along the old growth habitat along Alternative 8/9A while the forest located along the Alternative 8/9D alignment is characterized by younger, lower quality. Consequently, one of the advantages of Option 8/9D is its avoidance of the mature forest and higher quality resources that are prevalent in the older growth forest illustrated in the 1979 aerial photograph. Disadvantages to Option 9D include community impacts, additional forests impacts, farmland and agricultural reserve impacts and master plan nonconformance that are further discussed in **Section VII**.

B. Section 106 Coordination

To distinguish between the effects of the Alternative 8/9 three northern terminus Options A, B, and D on historic properties, MCDOT coordinated with the Maryland Historical Trust (MHT) for the National Register of Historic Places (NRHP) evaluation of five individual properties and districts located within the historic architectural area of potential effects (APE) (36 CFR Part 800.4(b)).

On July 8, 2013, MCDOT recommended to MHT the NRHP eligibility of the Woodbourne/Blunt House (M: 14-51) and Wildcat Road/Davis Mill Road Rural Historic District (M: 14-68); the Dayspring Retreat (M: 19-6), 21401 Davis Mill Road, and the Burton Woods District (M: 19-42) were determined not eligible. MHT concurred with the findings by letter dated August 26, 2013, except for the Wildcat Road/Davis Mill Road Rural Historic District which the agency found to

Alignment 8A/9A

26 Nov 1980

12 Jan 1980

22 Jan 1982

07 Aug 1981

M-83 Alignment

02 Aug 1979

18 May 1979

24 Sep 1973

Continues South on ROW dedicated 4 Feb 1983 Plat 20385

Dayspring Creek



Montgomery County Department of
Transportation
Planning

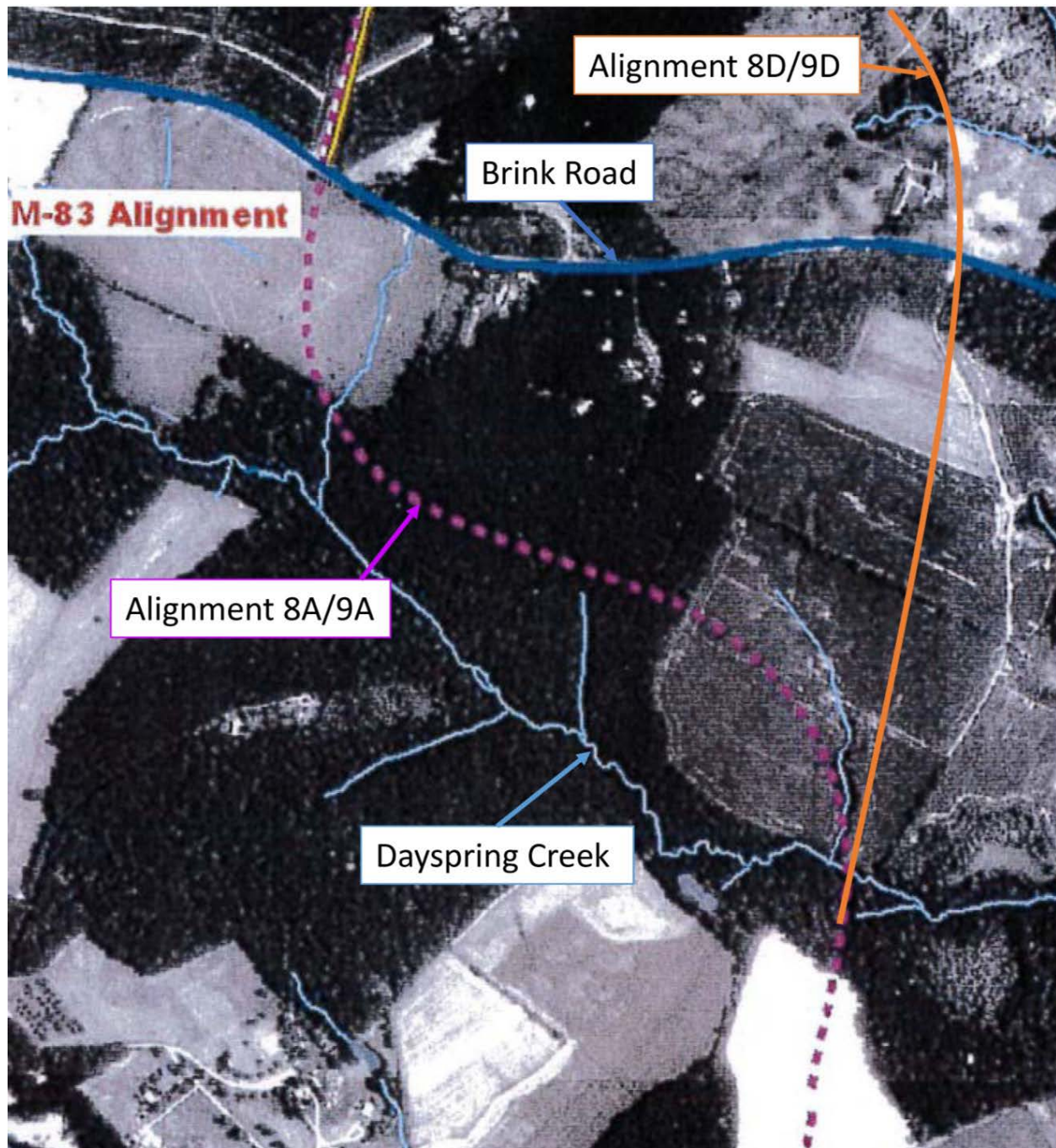


Figure V-2: 1979 Aerial Photo with Alignment Overlay

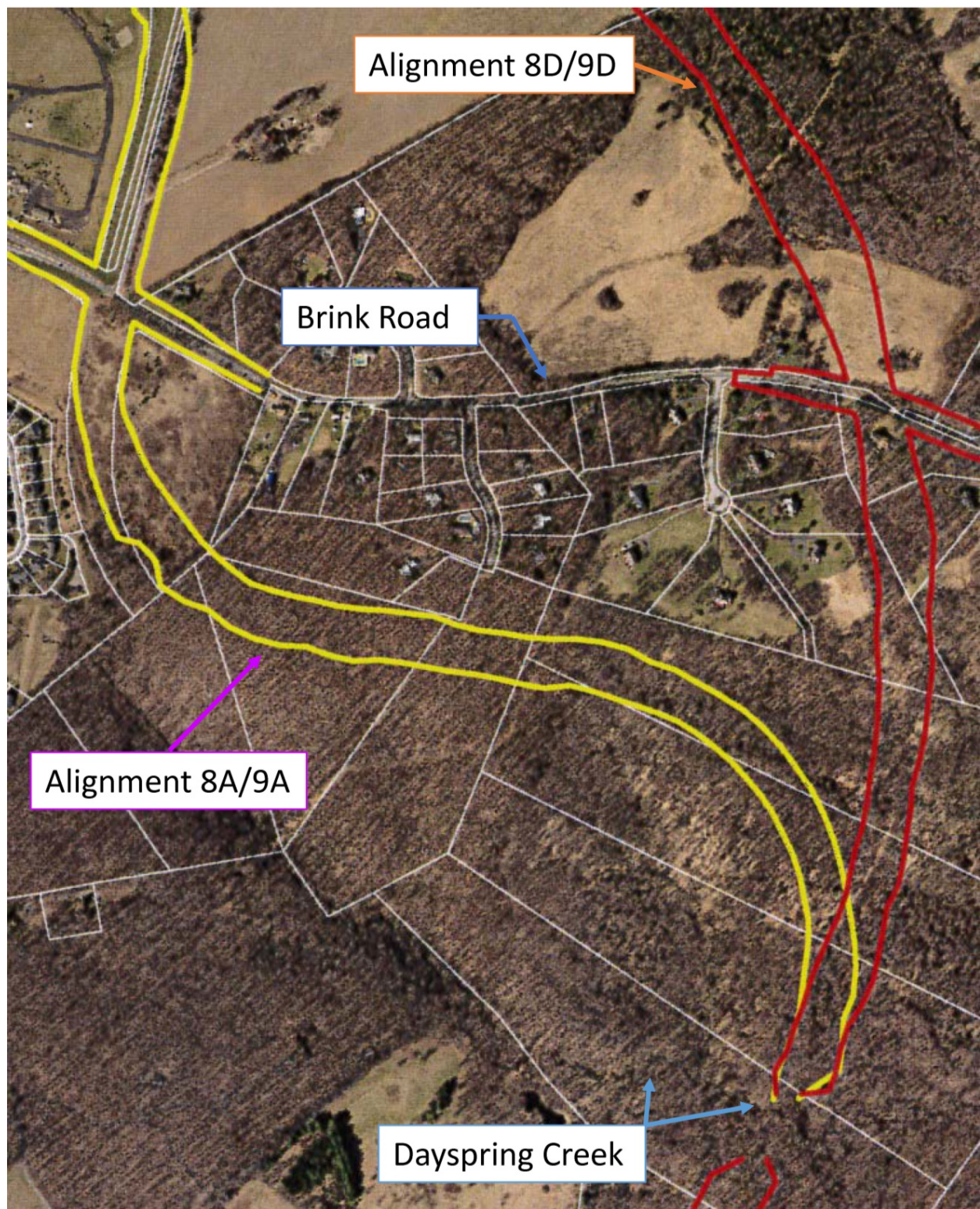


Figure V-3: 2013 Aerial Photo with Alignment Overlay

not be eligible for the NRHP. Additional consulting parties, namely Bethel City of Hope, the City of Gaithersburg, the Goshen Historical Preservation Society, the Greater Goshen Civic Association, The M-NCPPC, Montgomery Preservation, Inc., and Ms. Royal Wilson, were also consulted but no comments were received.

MCDOT will refine the historic architectural APE to reflect their selection of Alternative 9A as the preferred alternative. Should Butler's Orchard Log House (M: 14-47) remain within the APE, evaluation for eligibility for the NRHP would be required, per comments received from MHT in their August 26, 2013 letter. Upon completion of the refined APE and additional NRHP evaluation, including coordination with the consulting parties, MCDOT will assess the effects of the undertaking on historic properties (36 CFR Part 800.4(d)(2) and 800.5(a)). The assessment will include the Butler's Orchard Log House, if it is found to be eligible for the NRHP. While the Woodbourne/Blunt House is a historic property, it is located northeast of the Alternative 9A alignment and is, therefore, unlikely to be within the Alternative 9A APE. Additional information regarding the effects of the undertaking on historic properties will be included in the *Final EER*.

C. Forest Interior Dwelling Species (FIDS)

After discussions with the M-NCPPC Parks Department, it was decided that FIDS impacts in the *Draft EER* needed to be expanded to include indirect impacts, i.e., the 300-foot wide portion of interior forest located adjacent to the planned limits of disturbance of the build alternatives that would be converted to buffer. The updated direct and indirect FIDS impacts for each of the build alternatives would result in indirect impacts to FIDS habitat as outlined in **Table III-8**, page III-25 and **Table V-1** below. Mitigation opportunities for both direct and indirect FIDS impacts are discussed later in this report.

Table V-1: FIDS Habitat Impacts

FIDS HABITAT IMPACT	BUILD ALTERNATIVES								
	2	4 MOD	5	8A	8B	8D	9A	9B	9D
Direct (ac)	0	0	0	16.7	11.2	11.2	16.7	11.2	11.2
Indirect (ac)	0	2.2	0	66.8	54	58.4	66.8	54	58.4