

## Montgomery County Department of Transportation

### Response to U.S. Army Corps of Engineers Letter, Dated November 19, 2013 February 4, 2014

#### 1. Please submit your responses to the enclosed public/agency comments.

Response: In the body of the USACE letter, the USACE has summarized in a few short pages the types of comments and nature of comments provided by the general public. In addition, the USACE references letters from agencies that include comments regarding the Draft Environmental Effects Report (DEER) for this project and the public hearing documents, these include:

- Maryland Department of the Environment (MDE) dated December 12, 2013
- U.S. Environmental Protection Agency (EPA) dated August 20, 2013
- The City of Gaithersburg dated July 17, 2013

Separate responses to each of the EPA letter and the City of Gaithersburg letter are enclosed. By carbon copy, USACE will also be forwarded a copy of responses to the MDE letter. Additionally, a response to the August 23, 2013 letter from Montgomery County Public Schools is included in response #11 of our responses to the MDE letter. General comments from the public were summarized in the USACE letter and will be considered in the selection of a preferred alternative.

The MCDOT has reviewed the copy of public comments provided by USACE and MDE. MCDOT agrees with the USACE summary, provided in their November 19, 2013 letter. This summary adequately and appropriately captures the breadth of commenters and the nature/content of the comments received from the public. In addition, specific concerns raised by the general public were expanded upon in detailed comments number 1 through 18 in the USACE letter and number 1 through 8 in the MDE letter.

The USACE indicated that some reviewers commented that the DEER is biased toward the Master Plan Alignment (a new road build alternative) and does not consider transit options or consider the benefits of combining non-new alignment options with other road improvements and transit options in the area. MCDOT has considered these “alternatives” and provided additional information in our detailed responses and will include a discussion of these non-ARDS “alternatives” in the PA/CM report.

As with other high profile projects in Montgomery County, many of the letters received are repetitive/form letters from members of active community groups. All comments from the public and groups have been considered and will be responded to within the context for the Final EER.

In November, 2013, the Montgomery County Planning Board conducted an additional advertised public meeting regarding the Midcounty Corridor Study specifically to hear from the M-NCPPC and MCDOT staff regarding the alternatives and to allow the public to comment (provide testimony regarding the proposed project and alternatives) during the meeting. Subsequently, the Planning Board provided a position on behalf of MNCPPC regarding a preferred alignment based on all of the testimony and record/information compiled to date. The Planning Board considered input from the public at the meeting, the public comments from the USACE/MDE public meeting, and presentations from their technical staff in making a recommendation for a preferred alternative for this project. A copy of the Montgomery County Planning Board letter which documents their recommendation for a preferred alternative is attached (**Attachment A**).

- 2. Please include an evaluation of the Alternative 4 Modified alignment limited to the currently reserved right-of-way in an analysis of other possible combinations with the alternatives (e.g., Alternatives 4 Modified alignment with 80' ROW combined with Alternative 5 and 2).**

Response: Limiting the typical section of Alternative 4 Modified to an 80' ROW would require elimination of key elements such as bike lanes, sidewalk, shared use path, buffer strips and/or medians that are essential for the roadway to meet the project purpose and need. For instance, we would not eliminate or reduce the width of the bike lanes, sidewalk and/or shared use path since they are critical to providing safe and effective pedestrian and bicycle travel along the corridor. Buffer strips between the curb and sidewalk/bikepath are already at a minimal width of 3.5 feet. The 5 foot buffer width behind the bikepath/sidewalk could potentially be reduced to 2-3 feet but this would have a very minor effect on impacts while reducing the viability of sustaining healthy street trees along the corridor. In addition, reducing the right of way would not enhance the operational and safety concerns associated with the numerous driveways, increased potential for vehicular incidents, and the potential conflicts with school children who will need to cross four to six lanes of traffic to reach their school bus stop. In summary, we do not feel a reduced Alternative 4 Modified typical section is a viable alternative since it would not adequately meet the purpose and need of the project. We do not recommend it as a stand-alone alternative or in combination with other alternatives.

- 3. Please respond to the Woodland Hills Home Owners Association and other citizens concerns regarding air quality and Alternative 9's close proximity to Watkins Mill Elementary School by addressing if there is any increase in respiratory-related health issues in school children in similarly situated schools (e.g., those located along Great Seneca Parkway and the Intercounty Connector). Please describe which air pollutants would be most likely to affect an adjacent school and children and, if possible, evaluate each of the alternatives likelihood to pose such an air quality health risk.**

Response: We are unaware of any data that can answer the question if there are any increases in respiratory-related health issues in school children in similarly situated schools along transportation improvements such as those on Great Seneca Parkway and Inter County Connector. Additionally, we are not aware of any conclusive studies conducted regarding increases in respiratory-related health issues from air quality changes resulting from transportation improvements adjacent to schools in general.

Air pollutants that would be most likely to affect children at schools adjacent to highways were evaluated and described in detail in the DEER in Section 6. We refer you to the discussion in the chapter on the various pollutants regulated according to the Clean Air Act, the assessments made for this project and the results. Pollutants of concern assessed are contained in Table 6-1 and Table 6-2 including current attainment status and concentrations in Montgomery County. As described in this section of the DEER, neither the current condition nor the proposed condition of the alternatives studied generate exceedances of the National Ambient Air Quality Standards (NAAQS) air quality standards. Refer to Table 6-3 through Table 6-10.

The Air Quality assessments were conducted following standard NEPA/CAA protocols with the following general basis of understanding:

### **Risk Assessment**

- Federal and state agencies agree that air pollution from vehicles can affect the health of individuals and have implemented NEPA, the Clean Air Act (CAA/CAA90) and Federal Regulations.
- CAA/CAA90 requires EPA to establish National Ambient Air Quality Standards (NAAQS) for criteria pollutants based on substantial research to protect public health and welfare, including "sensitive" populations such as asthmatics, children and the elderly.
- 40 CFR 1502.22 provides requirements concerning unavailable or incomplete information, such as the health effect risks on residents adjacent to highways.
- The Midcounty Corridor Study air quality analyses were completed in conformance with NEPA, CAA/CAA90 and 40 CFR 1502 per EPA and FHWA guidance.

In summary, air quality studies conducted for pollutants of concern to asthmatics and children (such as CO and PM2.5) demonstrated that NAAQS will not be exceeded at communities and schools adjacent to the project for all alternatives considered.

- 4. Please address comments concerns about bridge elevations, shading, and conversion of wetlands, streams, and riparian areas located below any proposed bridges. Also, please address any construction best management practices (e.g., timber matting, grubbing but no clearing, additional mulch layers) to help assure construction activities do not permanently impact access areas. Please be advised that the Corps would require inspection and confirmation that all temporary impacts associated with construction are fully restored as part of any authorization compliance.**

Response: MCDOT understands that bridges over the wetland crossings may induce conversion impacts, particularly where the alternatives are crossing forested wetlands. Our engineers and scientists have been sensitive to the potential impacts at the proposed bridge crossings and have provided substantial vertical clearance at the majority of the crossings in an effort to reduce shading impacts. Of course, where proposed bridges span forested wetlands, impacts to the forests cannot be completely avoided and conversion impacts have been included and accounted for in the wetland impact area computations. However, we feel the clearances provided during the preliminary engineering of the alternatives are reasonable and provide opportunity to sustain newly converted emergent wetlands. Of course, we realize the "right vertical clearance" is not an exact science, and we will collaborate with the agencies during the final design of the preferred alternative to further refine the proposed bridge layouts and profiles to provide a design that enhances the ability to sustain wetlands and riparian buffer below the proposed bridges. These efforts will include follow up monitoring of effects for possible adjustments.

A wide variety of construction best management practices, including matting, mulching, limited clearing/grubbing, specialized equipment, and specific construction sequencing/phasing will be investigated and implemented during final design of the preferred alternative to minimize construction impacts and ensure that the construction activity impacts are temporary, rather than permanent. Temporary impact limits will be identified in greater detail for the preferred alignment once selected, and MCDOT will identify appropriate best management practices for construction in environmentally sensitive areas such as streams, wetlands, and riparian areas for the preferred alignment. We will also investigate recent experiences and successes on other transportation improvement projects and evaluate their potential application on this project. MCDOT acknowledges that

full restoration of the temporary construction impacts is a primary objective and will be required by the Corps, and the County is prepared to respond cooperatively to those requirements.

- 5. Please provide additional information on the transit options already being implemented by the county within the study area. In addition, please provide any additional information about a possible BRT system along MD 355 and Alternatives 8 and 9. Please address the comments that combining Alternative 2 with other alternatives or adding transit like a BRT system to other alternatives could reduce the amount of travel capacity necessary for Alternative 9. Also, please update transit options within the study area respective to the recently approved State funding approvals for projects in Montgomery County.**

Response: The County Executive and County Council have expressed in writing to the State Delegation and the MDOT Secretary that their transit priorities consist of continued support for the operation and funding of the Metro System, the construction of the Purple Line and the Corridor Cities Transitway (CCT). The Purple Line and CCT are currently being developed by the Maryland Transit Administration (MTA) within Montgomery County. The Purple Line is a proposed 16-mile light rail line extending from Bethesda in Montgomery County to New Carrollton in Prince George's County. The line will provide a direct connection to the Metrorail Red, Green and Orange Lines; at Bethesda, Silver Spring, College Park, and New Carrollton. The Purple Line will also connect to MARC, AMTRAK, and local county bus services. The Purple Line is located southeast of the study area but is connected to the study area by the Red Line route which terminates at the Shady Grove Metro Station. The project is planned to start construction in 2015 with service to begin in 2020. The project is funded for final design and right-of-way acquisition and MTA is currently pursuing federal funding for construction. Current total cost estimate for the project is \$2.4 Billion, which are not yet secured.

The second major transit improvement being developed at the western limits of the study area along I-270 is the Corridor Cities Transitway, a proposed 15-mile bus rapid transit (BRT) system between the Shady Grove Metro Station and the COMSAT facility near Clarksburg (**Attachment B**). The project has two phases. Phase I is the initial 9 miles from Shady Grove to Metropolitan Grove; this Phase is currently under development and is proceeding with engineering and environmental analysis and is funded for formal environmental documentation, final design, and right-of-way acquisition. Phase II is the future extension from Metropolitan Grove to the COMSAT facility, and will be completed with planned development and the availability of additional transportation funding. Neither phase is currently funded for construction. Estimated total cost for phase 1 is \$ 545 Million and an additional \$285 Million for phase 2.

In addition to the two MTA led projects described above, M-NCPPC has recently completed the Countywide Transit Corridors Functional Master Plan (CTCFMP), which identifies a planned 80 mile BRT network comprising 10 corridors and the Corridor Cities Transitway (**Attachment B**). The CTCFMP was just recently approved and adopted by the County Council on November 26, 2013. Two of the ten proposed corridors in the network are located along MD 355 and are identified as MD 355 North and MD 355 South. MD 355 South is located south of the study area and extends 8 miles along the MD 355 corridor between the Bethesda Metro Station and the Rockville Metro Station. The Master Plan generally recommends separate dedicated lanes for this Corridor, which is south and outside the study area.

MD 355 North extends approximately 12 miles from the Rockville Metro Station to Redgrave Place in Clarksburg; the portion located north of Shady Grove Road is located within the study area. The northern segment of the transitway between Redgrave Place and Shakespeare Boulevard is master planned to operate within mixed traffic on existing travel lanes. South of Shakespeare Boulevard, the system is generally master planned as a separate dedicated two-lane median transitway comprised of 4 travel lanes and 2 transit lanes. The planned lane configurations for portions of the MD 355 North corridor are typically based on repurposing 2 of the existing 6 travel lanes on MD 355 as dedicated transit lanes. However, it is important to note that the lane configurations are preliminary and the final lane determinations would be based on a detailed assessment of estimated ridership, operations, traffic analysis and potential environmental and community impacts.

Current county funding is supporting preliminary studies of BRT along the Georgia Avenue and Veirs Mill Road corridors by MTA/SHA. The County also plans to initiate studies of the "high priority" corridors along MD 355 South, Randolph Road and US 29 with \$10M in state funds made available from the new state gas tax revenues.

While various residents, coalitions and agency representatives have suggested that BRT be studied as an alternative to the roadway improvement alternatives currently included in the MCS, the County Master Plan does not view BRT as a substitute alternative to the proposed roadway improvements but as a transit improvement that should further enhance travel in the study area.

It is important to note that Midcounty Highway (Alternative 9A) remains within the County master plans as a key transportation element to support planned growth within the study area. The proposed roadway improvement alternatives in the MCS provide numerous transportation benefits that cannot be solely provided by MD 355 BRT alone including additional capacity, improved safety, accommodation of planned growth, improved travel times and improved mobility for all. Of special importance for the safety and security of the community is the improved response time for police services and emergency vehicles.

The capacity of MD 355 BRT, for example, cannot replace the capacity provided by a new 4-lane arterial highway (the Master Planned Alternative 9). Furthermore, a significant portion of the MD 355 BRT corridor is intended to be implemented by repurposing 2 of the existing 6 travel lanes, which of course will reduce automobile capacity within the study area. Consequently, BRT would potentially need to provide capacity and attract ridership that is equivalent to the 2 repurposed lanes on MD 355 as well as the 4 lanes associated with the Master Planned Midcounty Highway. The daily ridership estimates (approximately 21,500) for the MD 355 North BRT are less than one half the estimated daily traffic volumes on the proposed Mid County Highway by 2040. Furthermore, half of the estimated ridership on MD 355 BRT will be people who are currently using existing transit facilities, clearly indicating that the BRT cannot meet the estimated traffic demand of the proposed project.

Finally, the ability to fund and implement MD 355 BRT North would be highly unlikely in the near future due to its location beyond the County's urban core since the initial high priority corridors have been identified as US 29, Randolph Road and MD 355 South. Implementation of the MD 355 North BRT would likely take many years to fund since it is located behind miles of other stated higher priority corridors that will require many years and several hundred million dollars in funding to design, construct and operate. So in summary,

MD 355 BRT is a long term transit improvement that will further enhance transportation in the study area but that will not serve as a substitute for the master planned roadway improvements.

- 6. Please provide additional information about the current and proposed future status of the Shady Grove Metro station. Specifically, address comments that the station is already at capacity (parking and train) and does not offer a transit solution for travelers who would utilize a build alternative to take transit from the Shady Grove metro.**

Response: WMATA recently outlined their plan to increase station access in the Shady Grove Station Access Improvement Study Final Report, July 2011. The report indicates that Metro anticipates a 45% increase in ridership at the station over the next 20 years. Furthermore, Metro owns approximately 60 acres of land with development potential at the Shady Grove station and anticipates that this land will be developed in partnership with the County and the State under the joint development program. The goals of the proposed improvements would include creating transit oriented development that is comprised of walkable mixed used communities and which integrate the transit facilities to reduce auto dependency. Implementing this plan will also require redevelopment of Metro's property including reconfiguring the Metro bus, Kiss and Ride and parking facilities to meet the demands of the proposed development and future growth in station ridership.

- 7. Please update information concerning the Watkins Mill interchange at I-270 and any potential ramification for the study area and proposed project.**

Response: The Watkins Mill Road / I-270 Interchange project is fully funded for construction by SHA and is currently scheduled to be built between Winter 2016 and Fall 2018. The project's Preliminary Investigation (30% design) was held in November 2012 and a Value Engineering study was completed in January 2013. SHA is currently proceeding towards completion of Semi Final Plans (65% Design) in May 2014. While we have not specifically studied the effects of this project on the study area, we would anticipate that it will help to reduce traffic volumes on the adjacent east-west roadways – Quince Orchard Road and Montgomery Village Avenue – and will, therefore, help reduce congestion at the intersections of Quince Orchard Road and Montgomery Village Avenue with MD 355 and improve operations of the existing Interchange of I-270 at Quince Orchard Road.

- 8. Please clarify if M-83 would be a state or county controlled road if constructed. Please provide additional information about MD SHA control roads in the study area (e.g., I-270 and MD 27) and future improvements requested by the County.**

Response: M-83 would be paid with 100 percent County funds and therefore, it will be a county designed, built, maintained and operated roadway if constructed. Programmed improvements for other local roadways in the study area are identified under the No-Build Alternative on page 2-13 of the Draft EER. In regard to local SHA roadways:

- I-270 is planned to be widened to six lanes (a single HOV lane in each direction) between MD 121 in Clarksburg and MD 85 in Frederick. This project is currently on hold and is not funded for design, right of way acquisition or construction by SHA.
- MD 355 is not programmed for any further improvements by SHA.
- MD 27 is programmed to be widened to six lanes between Brink Road and Snowden Farm Parkway as a condition of development within Clarksburg. Completion of this project is expected within the next five years.
- MD 124 (Woodfield Road) is programmed to be widened to six lanes between Midcounty Highway and Airpark Road (Phase 2) and from Fieldcrest Road to Warfield Road (Phase 3). Design-build documents for Phase 2 are scheduled for completion by Summer 2015. Montgomery County has committed \$5M towards this project for design and right-of-way acquisition. The project is not funded for construction.
- Phase 2 of the Corridor Cities Transitway along the western side of MD 355 has been under study by the MTA. Design, right of way acquisition and construction has not yet been programmed by the County or the State.
- It is important to note that the traffic modelling for the Midcounty Highway project considered that all of these projects will be completed by 2040. If there is not sufficient funding for their implementation, the need for the M-83 project would be even greater.

**9. Please address the environmental justice concerns raised in EPA's comment letter.**

Response: A separate response to the EPA's comment letter dated August 20, 2013 is enclosed. This response addresses the environmental justice concerns raised by EPA.

**10. Please address the concerns raised by citizens in the Fetrows neighborhood, Wacomor Drive, and Ward Avenue regarding traffic concerns and Alternative 9.**

Response: Wacomor Drive and the Fetrows neighborhood are located on the east side of Ridge Road approximately 1 mile north of the proposed intersection of Midcounty Highway and Ridge Road. The community has expressed concern with difficult access from Wacomor Drive as a result of high traffic volumes on Ridge Road. This issue is an existing intersection access issue that could potentially be improved through supplemental intersection improvements (such as left turn lanes, medians, signing, signalization, etc.). Since Ridge Road is a state roadway (MD 27), this issue should be addressed separately by the community through the Maryland State Highway Administration (SHA) District 3 Office.

**11. Please address the City of Gaithersburg comments.**

Response: A separate responses to the City of Gaithersburg comment letter dated July 17, 2013 is enclosed.

**12. Please include aspects of community disruption and fragmentation in the quality of life analysis for each alternative.**

Response: The DEER contains discussion on community disruption and fragmentation for each alternative. The information is "threaded" throughout the document in various sections. The information will be consolidated into a quality of life analysis section of the FEER if desired by the USACE. Inherent in the Montgomery County Master Plan development process is the goal to prevent/avoid community disruption and fragmentation in the quality life. Infrastructure improvements are identified in the plan and must be approved

in the plan before implementation. Infrastructure improvements, such as roads/highways, in the plan are based on serving the needs of the development identified in the plan. Road improvements in Montgomery County therefore are meant to provide the cohesion necessary for the plan elements to work and to avoid unexpected disruptions in the community.

**13. Please clarify if impact fees are collected from development in Clarksburg and if any are dedicated to transportation projects. Please clarify what type of development is allowed within the Agricultural Preserve, parkland, and Special Protection Areas within the study area.**

Response: By *Montgomery County Code, Chapter 52, Article 7*, Montgomery County imposes "development impact **taxes**" on new development to help pay for transportation and public school improvements necessitated by the new development, including the Clarksburg area. Under the law, developers can get "impact tax credits" in lieu of paying the tax, if they build transportation infrastructure that meets certain criteria. For example, impact tax credits have been instrumental in completing the construction of Snowden Farm Parkway in Clarksburg Village by Elm Street Development and the Artery Group. The extent to which impact taxes may be used to fund the design and construction of the proposed Midcounty Highway project have not yet been determined. All school impact taxes are devoted to school construction.

The undeveloped properties north of Brink Road located within the Agricultural Reserve are currently zoned Rural Density Transfer (RDT), as are the Woodfield Farm and Benson-Sibley Farm. Types of potential development that are permissible for RDT zoning are presented within Section 7.1 of the Draft EER. The Montgomery County Planning Department has indicated that Alternative 4 Modified or a master plan alternative that includes Northern Terminus Option D could result in some development pressure within the Agricultural Reserve. However, the likelihood of significant additional development being approved appears remote when considering the stringent state and county regulations that affect development within the Agricultural Reserve. Further, land use and development in the Agricultural Reserve and in greenways and land to be dedicated for Parks (Dept. of Parks) is strictly regulated and limited by specific land use and zoning provisions. Any development of parkland, for instance, must be consistent with Vision 2030; Strategic Plan for Park and Recreations in Montgomery County, MD (2011).

Within Special Protection Areas, special measures - especially around construction sites - are implemented to protect natural resources and features that may be affected by the construction. As outlined on page 7-4 of the Draft EER, these measures include:

- Establishing and enforcing imperviousness restrictions on future development within the SPA.
- Providing compensating BMPs for increased imperviousness in sensitive watersheds and SPAs; and
- Expanded wetland buffers in SPAs of up to 150 feet for wetlands on first and second order streams in Use III watersheds, 75 feet on first and second order streams in Use IV watersheds, and 50 feet on first and second order streams in Use I watersheds.

Further, all development, including county road projects, taking place in Special Protection Areas must develop a water quality plan to be approved by the Planning Department and Department of Permitting Services. The water quality plan addresses environmental

sensitive design, minimization of imperviousness and forest conservation while maximizing sediment control and stormwater management.

**14. Please clarify if the proposed project will include environmental stewardship projects.**

Response: Upon selection of a preferred alternative, MCDOT will begin working with other Montgomery County agencies and departments to identify potential environmental stewardship projects associated with the proposed improvements. As the project is 100 percent locally funded, the extent of the stewardship will be based on the funding appropriations approved by the County Council. Extensive coordination has already occurred with the MNCPPC, Corps, and MDE regarding potential mitigation and stewardship projects on parklands for park, wetlands, stream, forest and FIDS resource enhancement in the area. MCDOT will continue this effort as outlined by MNCPPC in its November 25 letter supporting continued discussion on appropriate environmental stewardship projects within this project corridor.

**15. Please correct labeling errors on maps in the DEER as noted in citizen's comments.**

Response: Labeling errors on maps will be corrected in future submittals including the PA/CM and FEER.

**16. Please provide information of the alternative potential impacts to Green Infrastructure (e.g., hubs and corridors) within the study area and forest interior dwelling bird habitat.**

Response: Green Infrastructure and FIDS impacts occur in the Great Seneca Creek and Cabin Branch stream valley corridors for some of the ARDS. Alternative 2 contains no impacts to Green Infrastructure or FIDS habitat. Alternative 4 impacts Green Infrastructure where widening the existing roadway crosses the corridor of Cabin Branch Stream Valley Park (Snouffer School Road) and the hub of Great Seneca Stream Valley Park (Wightman Road). Green infrastructure impacts for Alternative 4 total 6.23 acres, including 2.17 acres of FIDS impacts. These impacts occur along the existing FIDS buffer at Cabin Branch (774 sf), Great Seneca (13,241 sf), and the forest area east of Woodfield Road (80,671 sf). Alternative 5 will not impact Green Infrastructure or FIDS since no road widening will occur at the existing bridge crossing of Great Seneca Stream Valley Park (Frederick Road – MD 355).

Alternatives 8 and 9 impact Green Infrastructure at the proposed alignment crossing of Great Seneca Creek (hub) and northeast of Middlebrook Road in the Brandermill Tributary area totaling 25.9 acres. In addition, Alternatives 8 and 9 Northern Terminus Options will have the following Green Infrastructure impacts:

- Northern Terminus A: Great Seneca Stream Valley Park (hub) along Dayspring Creek at North Germantown Greenway Stream Valley Park -- 23.6 acres.
- Northern Terminus B: Great Seneca Stream Valley Park (hub) along Dayspring Creek at North Germantown Greenway Stream Valley Park -- 15.9 acres.
- Northern Terminus D: Great Seneca Stream Valley Park (hub) along Dayspring Creek at North Germantown Greenway Stream Valley Park -- 15.7 acres.

Alternatives 8 and 9 impact FIDS and FIDS buffer at the crossing of Great Seneca Creek and northeast of Middlebrook Road in the Brandermill Tributary area (921,511 sf) and at Whetstone Run, NW of the PEPCO property (78,185 sf), resulting in FIDS and FIDS buffer

impacts of nearly 23 acres. In addition the Alternatives 8 and 9 Northern Terminus Options will have the following FIDS and FIDS buffer impacts:

- Northern Terminus A: Great Seneca Stream Valley Park along Dayspring Creek at North Germantown Greenway Stream Valley Park – 60.6 acres.
- Northern Terminus B: Great Seneca Stream Valley Park along Dayspring Creek at North Germantown Greenway Stream Valley Park – 42.19 acres.
- Northern Terminus D: Great Seneca Stream Valley Park along Dayspring Creek at North Germantown Greenway Stream Valley Park and the Wilson Property– 46.7 acres.

**17. Please clarify whether roadway intersections on the alignments are viewed as increased transportation system connectivity or traffic delay points for each alternative.**

Response: Roadway intersections on the alignments represent opportunities for connectivity to the surrounding roadway network but also act as conflict points which can cause traffic delay. The objective in transportation design is to provide a network of different roadway classifications (expressways, arterials, collectors, and local roads) that have varying degrees of access control (driveways to homes and businesses), varying numbers of intersections and distance between intersections. A properly balanced roadway network, with different road classifications, will allow for safe and efficient travel for all modes of traffic for various types of trips throughout the study area.

**18. Please note that in accordance with the Corps/EPA Compensatory Mitigation Rule, prior to a permit decision, the Corps must approve a final mitigation plan to compensate for the permanent impacts to waters of the U.S., including jurisdictional nontidal wetlands. In addition, permanent conversion of waters of the U.S., including jurisdictional nontidal wetlands, may also require compensatory mitigation. Functional assessments will be required for all proposed impacts to waters of the U.S. and any compensatory mitigation requirements will be based upon full replacement of permanently impacted (including conversion) aquatic resources.**

Response: MCDOT understands that a final mitigation plan will be required prior to a final permit decision. We anticipate completing the mitigation plan upon selection of a preferred alternative when final impacts to jurisdictional waters including wetlands can be determined for the preferred alternative. MCDOT will continue to work with USACE and MDE to confirm compensatory mitigation requirements based on impact calculations and the applicable functional assessments.

Since functional assessments are required for all proposed impacts to Waters of the US, including wetlands -- we propose that functional assessments be carried out according to *The Highway Methodology Workbook Supplement* by the USACE New England District.

MCDOT's Response to  
USACE's November 19, 2013 Letter  
February 4, 2014

## **ATTACHMENT A**





**MONTGOMERY COUNTY PLANNING BOARD**  
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

November 25, 2013

Arthur Holmes, Jr.  
Director, Montgomery County Department of Transportation  
Executive Office Building (EOB)  
101 Monroe Street, 10th Floor Conference Room  
Rockville, Maryland 20850

RECEIVED  
DOT

DEC 01 2013

DIVISION OF TRANSPORTATION  
ENGINEERING

RE: Midcounty Corridor Study  
May 2013 Draft Environmental Effects Report

Dear Director Holmes:

Staff from the Departments of Planning and Transportation briefed the Planning Board on the May 2013 Draft Environmental Effects Report (MCDOT EER) during the Board's regularly scheduled meeting on November 21, 2013. Following the briefing by the Planning staff and MCDOT staff, the Board received public testimony and discussed the MCDOT EER Alternatives Retained for Detailed Study and the proposal for a parkland mitigation strategy.

During that discussion, the Board supported continued coordination between MCDOT and M-NCPPC Parks Department to develop mitigation for park impacts of a selected alternative that combines park replacement, recreational facilities (e.g. trails) and environmental stewardship projects (e.g. stream restoration, wetland creation, and/or stormwater retrofits). The replacement land should be of equal or greater natural, cultural, and recreational value to that lost due to construction of the road.

After consideration of the staff briefing and public testimony, the Board passed a motion, 3-2, to support the MCDOT EER Alternative 9A, the Master Plan Alignment of Midcounty Highway.

Thank you for the opportunity to provide a recommendation on this study. If you have any questions or comments concerning our review, please feel free to contact me directly or to contact Mary Dolan, Chief of the Functional Planning & Policy Division, at 301-495-4552.

Sincerely,

Françoise M. Carrier  
Chair, Montgomery County Planning Board

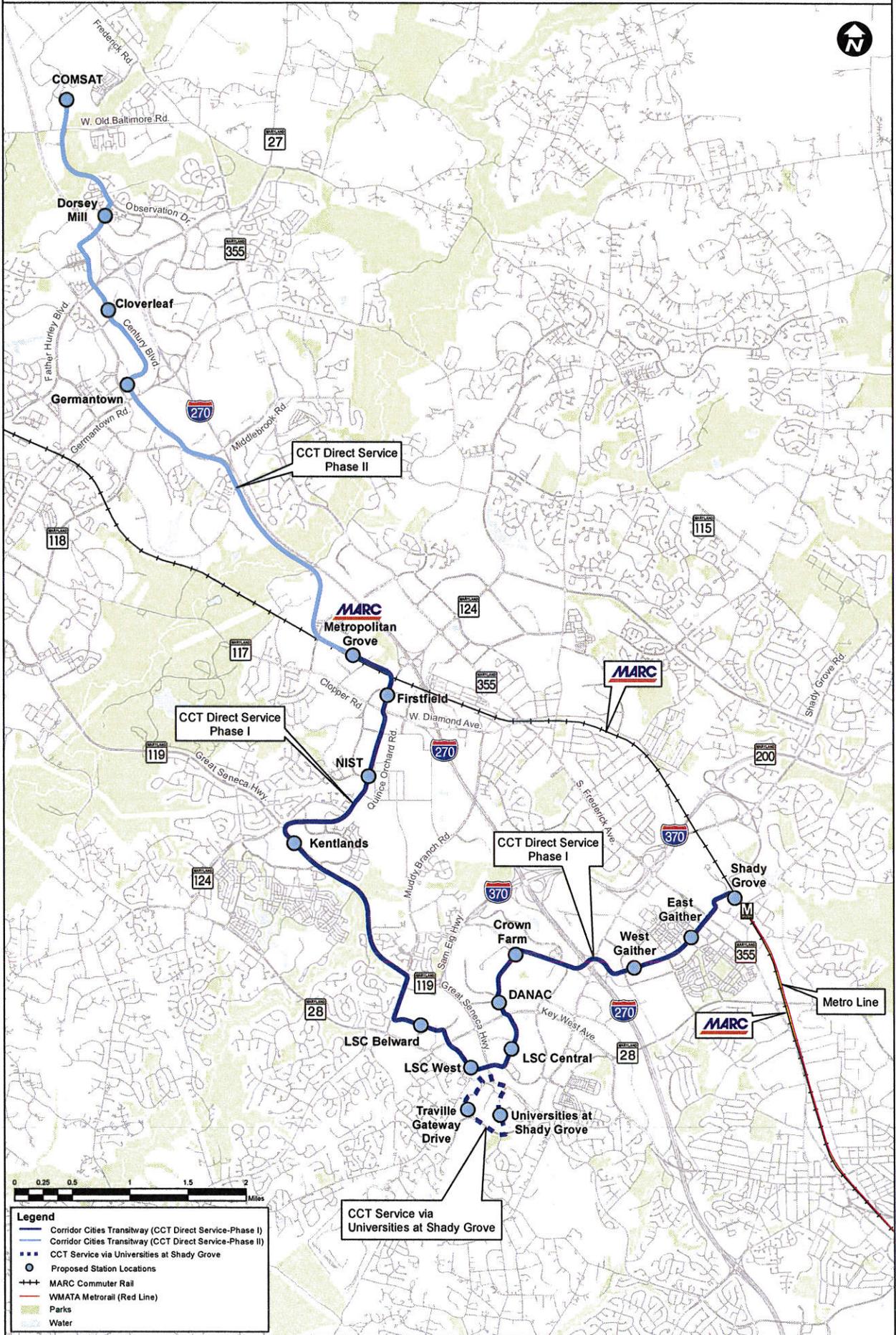
cc: Glenn Orlin, Ph.D., Deputy Chief of Staff, Montgomery County Council  
Edgar Gonzalez, Deputy Director for Transportation Policy – MCDOT  
Aruna Miller, Planning Manager – MCDOT  
Greg Hwang, Project Manager – MCDOT



MCDOT's Response to  
USACE's November 19, 2013 Letter  
February 4, 2014

## **ATTACHMENT B**

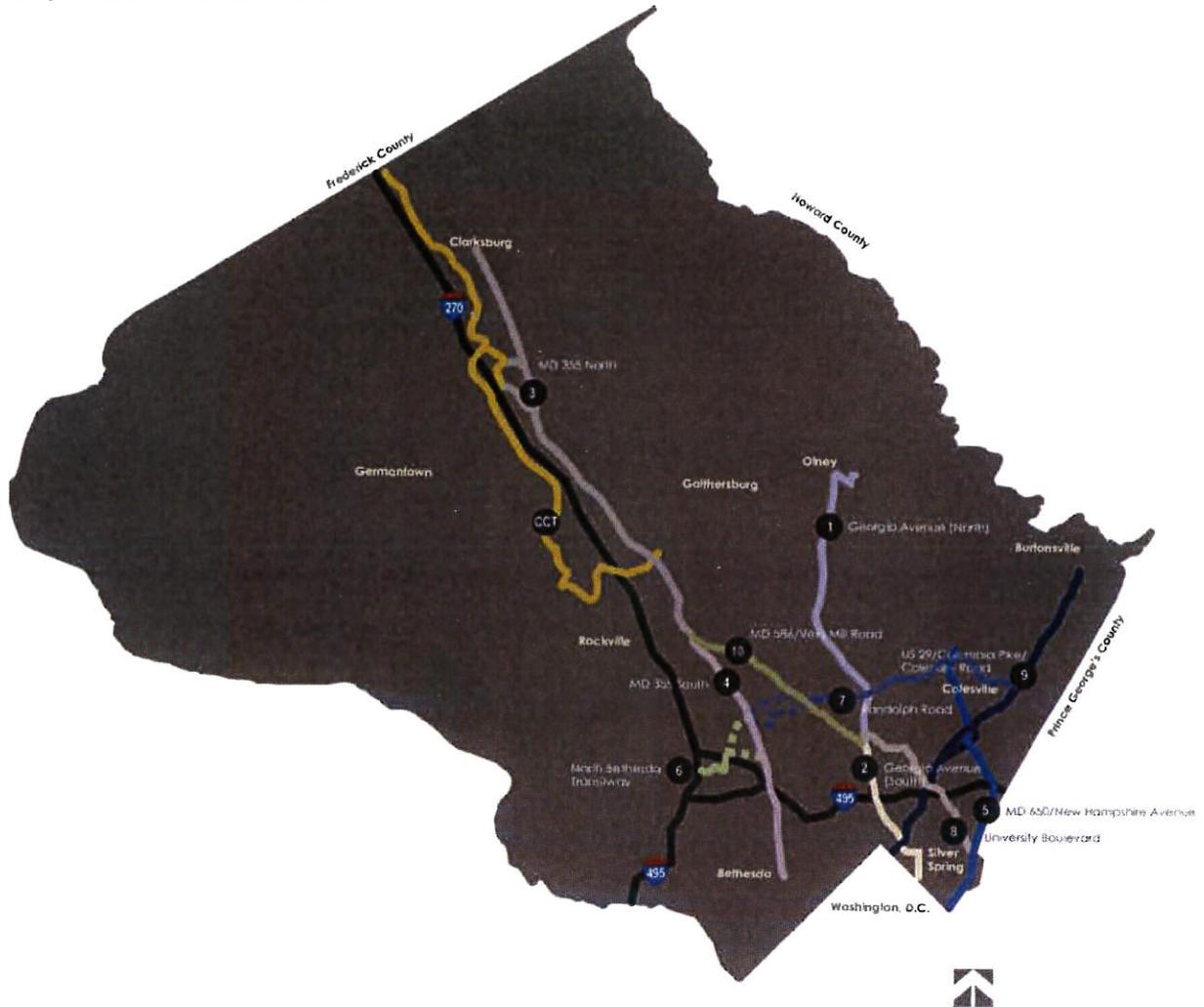




- Legend**
- Corridor Cities Transitway (CCT Direct Service-Phase I)
  - Corridor Cities Transitway (CCT Direct Service-Phase II)
  - CCT Service via Universities at Shady Grove
  - Proposed Station Locations
  - +—+— MARC Commuter Rail
  - WMATA Metrorail (Red Line)
  - Parks
  - Water

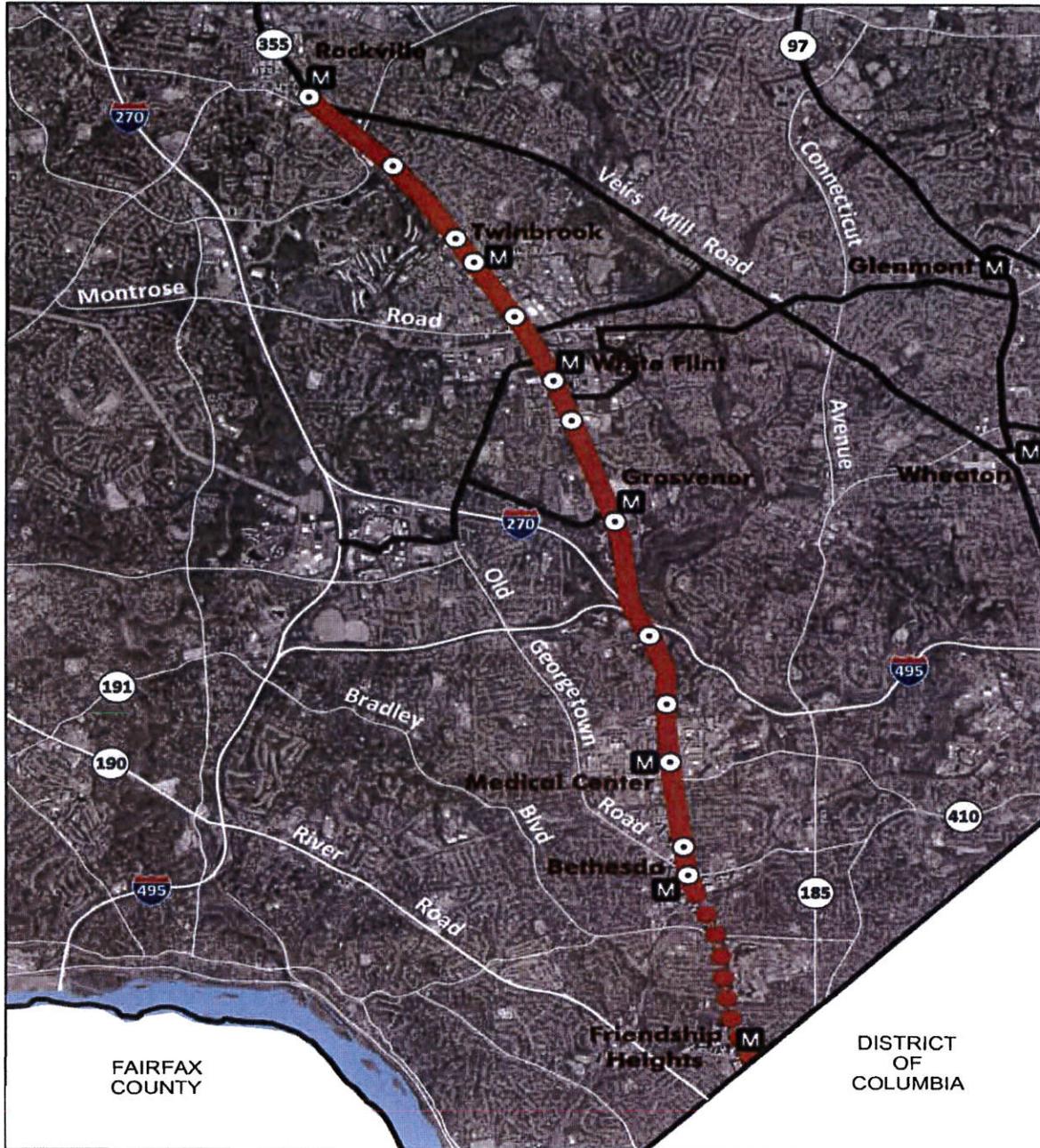
CCT Service via Universities at Shady Grove

Map 1 Recommended BRT Corridors



- Corridor 1: Georgia Avenue North
- Corridor 2: Georgia Avenue South
- Corridor 3: MD 355 North
- Corridor 4: MD 355 South
- Corridor 5: New Hampshire Avenue
- Corridor 6: North Bethesda Transitway
- Corridor 7: Randolph Road
- Corridor 8: University Boulevard
- Corridor 9: US 29
- Corridor 10: Veirs Mill Road
- Corridor CCT: Corridor Cities Transitway

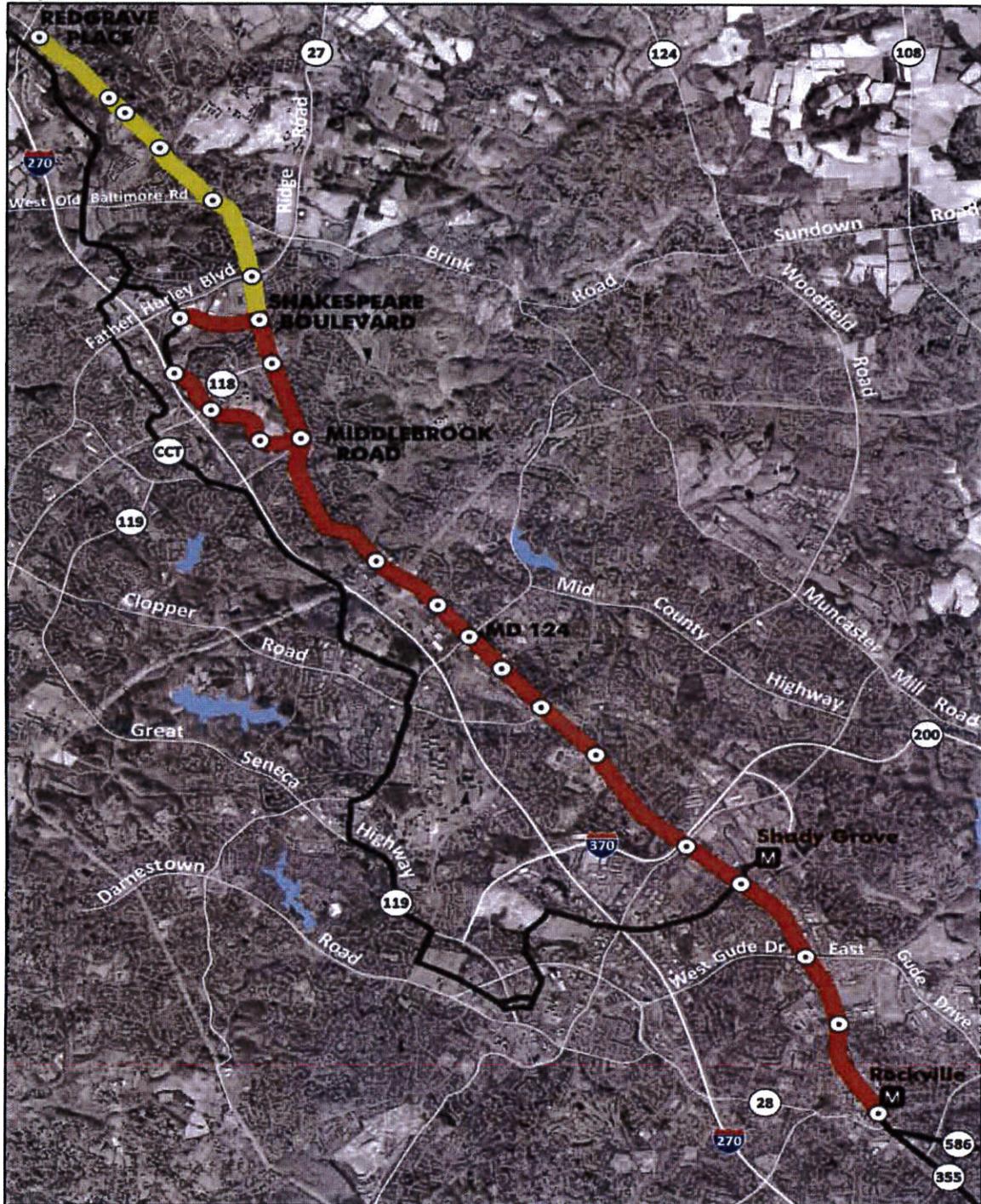
Map 6 MD 355 South Corridor



- County Line
- Other BRT Corridors
- Dedicated Lane(s)
- BRT Station
- Potential Dedicated Lanes (see text)
- M Metro Station



Map 5 MD 355 North Corridor



-  Dedicated Lane(s)
-  Mixed Traffic

-  Other BRT Corridors
-  BRT Station
-  Metro Station

