



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

January 14, 2011

Mr. Gwo-Ruey Hwang, P.E.  
Montgomery County Department of Transportation  
Division of Transportation Engineering  
100 Edison Park Drive, 4<sup>th</sup> Floor  
Gaithersburg, Maryland 20878

Re: Midcounty Corridor Study Alternatives Retained for Detailed Study (ARDS) Modified ARDS Recommendations, Montgomery County, Maryland November 29, 2010

Dear Mr. Hwang,

The U.S. Environmental Protection Agency (EPA) Region III has received copy of the above referenced document and the request for concurrence on the ARDS recommendations for the Midcounty study. EPA tries to maintain involvement and understanding of the Montgomery County project because of the threatened significant impact to natural resources posed by some alternatives being considered in the study. EPA looks forward to a continued involvement in the study as work is done to analyze alternatives to address transportation needs of the area, identify natural and cultural resources, and measures and designs to avoid impacts to these resources.

EPA appreciates the County's continued work to solicit input on the project from the public and government agencies, and for the consideration given to the comments made by resource and permitting agencies. EPA is comfortable with the range of alternatives retained for the environmental impact study. It is important for these alternatives to be evaluated in a complete and fair manner. As the area's transportation network is a complex mixture of modes and infrastructure, it is understood the study is a large undertaking. EPA looks forward to an analysis which investigates the complexities and seeks ways to improve infrastructure function across the study area and preserves the County's critical natural resources. Comparison of alternatives will need to be sophisticated, as different termini are being considered, movement in multiple corridors are of interest, various modes of transportation (transit, truck, vehicular, bicycle and pedestrian) will be analyzed along local and regional paths, and as an alternative such as 4 Modified which combine analysis of alignments may obviously have a larger number of intersections, driveways, property impacts, etc. (though benefit may be realized over existing conditions).

EPA supports inclusion of Alternative 4 Modified. We believe it is understood with all alternatives, as study progresses, the alternative can be adapted to take advantage of findings, to

minimize impacts and enhance transportation service. For example, there could be reason to suggest the truncation of the Master Plan alignment at Middlebrook Road in the Master Plan Alternatives (8 or 9); there may be suggestions for resource avoidance in the design of the Master Plan Northern Terminus Options. Since Alternative 4 Modified combines ideas from two previous suggested alternatives, it will need to be viewed for the best options within these alignments to meet purpose and need, for instance the alternative may need flexibility in the conceptual design of the connection to Shady Grove and improvements of flow by the airpark for local and regional traffic. If it is determined that portions will not benefit from more than the planned upgrades (MCDOT Capital improvements), impacts may not need to be considered as part of the Midcounty project (or can be segregated when presenting comparison impacts). It should be made clear if both Options 10A and 10B will be studied in Alternative 4 Modified.

Thank you for the opportunity to provide comment on the project. If you have any questions or would like to discuss comments further, please feel free to contact me at your convenience, at 215-814-3322 or [rudnick.barbara@epa.gov](mailto:rudnick.barbara@epa.gov).

Sincerely yours,



Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs

Enclosure

cc: Army Corps of Engineers  
Maryland DNR



## Alternatives Retained for Detailed Study

**Project Name: Midcounty Corridor Study (MCS), Montgomery County, Maryland**

**Having reviewed the June 2010 draft Alternatives Retained for Detailed Study (ARDS) document and the November 29, 2010 supplement letter, (by signing this document) the following agency:**

U.S. Environmental Protection Agency       U. S. Army Corps of Engineers

Maryland Department of the Environment

Concur (without comments)     Concur (w/ minor comments)     Does Not Concur

Comments / Reasons for Non-Concurrence: *attached*

*Note: Please do not provide "conditional" concurrence. You should either concur with the information as provided (without comments or with minor comments) or non-concur until revisions are made or additional information is provided.*

Additional Information Needed:

Signature: \_\_\_\_\_



Date: 1/14/11