



CARDEROCK SPRINGS
National Register of Historic Places

October 8, 2021

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, letter to MHT and VDHR from State Highway Administration dated September 8, 2021 (“SHA Letter”)

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 the SHA letter referenced above, including the revision of the Area of Potential Effects (APE) and the updated Limits of Disturbance (LOD). It is our understanding that the Preferred Alternative represented in the current design is Alternative 9, which adds two HOT managed lanes in each direction to I-495 and I-270 in the current, reduced project area (Phase 1 South). This is consistent with the previous iteration of the design presented to us for the areas bordering the Carderock Springs Historic District (CSHD) and Carderock Springs South, although the APE and the LOD have shifted to minimize impacts on the Morningstar Tabernacle 88 Moses Hall and Cemetery and to incorporate changes due to the advancement of the design.

Consistent with our previous comments to the SHA, we request that the preferred alternative be modified so that only one lane be added to each side on I-495 to minimize negative impacts on our community and the adjacent Gibson Grove Church while continuing to minimize adverse effects on the Moses Hall Cemetery.

The currently introduced design includes an increase in impact on the CSHD from that indicated on the DEIS issued last fall due to the design refinements. These include design modifications at the Cabin John Parkway Interchange to minimize impacts to Morningstar Tabernacle No. 88 Moses Hall and Cemetery, resulting in shifting the centerline of I-495 towards the north (towards the CSHD) compared to existing conditions, as well as revisions to the locations of exchange ramps, construction of retaining and noise walls along the outer loop, and clearing and erosion and sediment control measures.

We disagree with SHA’s determination that “the project will not adversely affect the Carderock Springs Historic District” and with SHA’s statement that “these actions will not disturb the original topography and natural vegetation within Carderock Springs.” Per SHA’s letter, both physical effects and potential visual, atmospheric or audible effects within the APE were considered in this determination. SHA is also

requesting from the Maryland Historic Trust (MHT) that they concur with the “no adverse effects” determination for the Carderock Springs Historic District should the Preferred Alternative be selected and that they acknowledge FHWA’s intent to make a *de minimis* impact finding for the district. It is our understanding that a *de minimis* impact finding signifies that, after taking into account avoidance, minimization, mitigation and enhancement measures, no adverse effect to the activities, attributes or features of our historic site under Section 4(f) protection is found.

Physical Effects: It is noted in the letter that the Preferred Alternative would result in impacts of less than 0.1 acre of the Carderock Springs Historic District, including permanent and temporary impacts. This represents an increase from the no impact reported in the DEIS. Furthermore, it is stated that the LOD adjoining Carderock Springs Historic District will impact approximately 3.2 square feet of the rear yard at 7610 Hamilton Spring Road, a contributing resource within the district. Based on our review of Map 7 in Appendix D of the SDEIS, which contains the Environmental Resource Mapping, it appears that this impact occurs at 7608 Hamilton Spring Road, not at the adjacent property at 7610 Hamilton Spring Road. This should be verified and amended as appropriate and as needed in the Final EIS. This LOD impact is in part due to the shifting of the centerline of I-495 noted above in combination with the construction of the new noise barrier walls and the 10-foot offset of the LOD behind the proposed walls. While we consider the noise barrier walls an important part of this project if the Preferred Alternative moves forward, we still consider this physical effect to have a negative impact on the CSHD and specifically on the property at 7608 Hamilton Spring Road.

Visual and Audible Effects: The SHA letter states that “the proposed noise wall will further screen the district from visual and audible effects already present along I-495.” It is true that there are audible and visual effects already present at the properties bordering I-495, including numerous residences and the Carderock Springs Elementary School. There is a long history of noise levels that exceed the 66 dBA limits provided in the Noise Abatement Criteria (NAC) for Category B and Category C properties, resulting in letters to SHA and to our elected officials from affected residents, the Carderock Springs Citizens Association and the Carderock Springs Elementary School PTA Board requesting action to resolve these issues. These efforts date back to 1985 and have continued into the present with renewed energy every time the Beltway is widened or elevations are modified. Previous commitments to provide noise barriers following a 2001 SHA Sound Barrier Analysis fell through due to lack of funding. The results of that analysis showed noise levels reaching 80 dBA in properties adjoining the Beltway, and these noise levels still exist today. This is not an acceptable condition.

We have reviewed the proposed noise barrier information provided in the Supplemental Draft Environmental Impact Statement (SDEIS) Appendix E, the Noise Technical Report Addendum. Per this report, noise barriers that are typically 24 feet tall, but could reach 32 feet in some instances, are being proposed for the area that affects the CSHD and Carderock Springs South (NSA 1-03, NSA 1-04 and NSA 2-01). For the Preferred Alternative, estimated maximum noise levels were noted to be 78 dBA without noise barriers; these levels would be reduced to a maximum of 67 dBA with the proposed noise barriers. We agree that, should the Preferred Alternative, or any Alternative for that matter, move forward, that these noise barriers be included in the design to reduce the noise levels in the properties bordering the Beltway.

Regarding the visual effects of the Alternative 9, we do not agree that the proposed project does not have an adverse visual impact on the CSHD. As noted in the SHA letter, 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. In addition to their contribution to the visual aesthetic and historic natural setting, the existing mature, tall trees 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 have not seen in any of the materials developed in connection the proposed I-495/I-270 Managed Lane Project, including the DEIS and the SDEIS, any specific information on the number and location of mature trees that are within the APE that will need to be removed. We believe that until a survey of the existing conditions of mature trees has been completed and an analysis of the number of trees that will need to be removed has been conducted the SHA cannot make a determination on the lack of visual impacts to the CSHD.

Our preferred course of action is to further limit the final width of the Beltway to minimize the impact on the historic landscape and mature trees in the CSHD. Where the landscape inevitably will be affected by the widening of the highway and the installation of the noise barriers, careful consideration should be given to the appropriate design for a noise barrier and the visual impact it will have on the area. Placing a tall barrier adjacent to our community's low-profile homes can impede the view and negatively impact the aesthetic dynamic. Additional discussions regarding potential mitigation of the visual impact of the noise barriers and the impact to the native vegetation will be an important part of the design process as it moves forward. This should include consideration of wall height, wall materials, and replacement of native vegetation and appropriate landscape elements to the foreground to reduce the barrier's visual impact. Please note that even replanting native trees adjacent to the noise walls will not immediately replace them due to the time it will take for their growth.

In addition to the visual effects from the noise barrier walls, we also understand that the current design incorporates fly-over ramps in several locations adjacent to the CSHD and Carderock South to allow traffic to access the managed lanes. While this design does not appear to have been presented in detail to date, we believe that these ramps will result in both a negative impact on the visual quality of our community due to their elevation and an increase in noise generated from the traffic utilizing these ramps, and 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.

In summary, we contend that the project will adversely affect the Carderock Springs Historic District and disagree with SHA's statement that "these actions will not disturb the original topography and natural vegetation in Carderock Springs." In addition, we disagree with FHWA's intent to make a *de minimis* impact finding for the district for our historic site under Section 4(f) protection. We reiterate that the anticipated adverse effects will include property loss, loss of mature trees and landscape buffer, changes to the historic settings and feeling due to tree loss and highway encroachment, visual and sound impacts from the proposed fly-over ramps, and a potential increase in air pollution.

As part of the Programmatic Agreement, we request the following as a Consulting Party:

- to continue to search for creative design solutions that prioritize avoidance of adverse effects per Section 106, which would require no encroachment of the LOD on Carderock Springs Historic District, Carderock Springs South, Gibson Grove Church or Moses Hall and Cemetery, or adverse impacts on their visual and environmental qualities;
- that quarterly meetings be held to inform our communities of the status of the proposed project and any changes to the current design and to allow the community to voice concerns and ask questions;
- that we be a part of the design review process for the road, sound walls, and associated signage and lighting with the P3 partner, and be given the opportunity to provide formal comments in response to the proposed design at the 30% / 50% / 90% design phases; and
- 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.

Thank you for consideration of these comments.

John R. Orrick

John Orrick

President, Carderock Springs Citizens Association

cc Elizabeth Hughes, State Historic Preservation Officer, Maryland Historical Trust
Julie Langan, State Historic Preservation Officer, Virginia Department of Historic Resources