



DEPARTMENT OF TRANSPORTATION

Isiah Leggett
County Executive

Arthur Holmes, Jr.
Director

November 29, 2010

Mr. Joe DaVia
US Army Corps of Engineers
CENAB-OP-RMN
Post Office Box 1715
Baltimore, Maryland 21203-1715

**Re: Midcounty Corridor Study
Alternatives Retained for Detailed Study (ARDS)
Modified ARDS Recommendations**

Dear Mr. DaVia,

This letter is to obtain your concurrence on the Montgomery County Department of Transportation's (MCDOT) Midcounty Corridor Study (MCS) Alternatives Retained for Detailed Study (ARDS).

MCDOT is requesting formal concurrence from the United States Army Corps of Engineers (USACE), US Environmental Protection Agency (USEPA) and Maryland's Department of the Environment (MDE) on the alternatives below:

Alternatives recommended for detailed study (see enclosed map):

- Alternative 1, No Build;
- Alternative 2, Transportation Systems Management/Travel Demand Management;
- Alternative 4 Modified, Brink-Wightman-Goshen-Snouffer School-Muncaster Mill;
- Alternative 5, MD 355 with Service Roads;
- Alternative 8, Master Plan Alignment truncated at Watkins Mill Road;
- Alternative 9, Master Plan Alignment; and
- Master Plan Alignment Northern Terminus Options A, B, and D.

Enclosed in more detail is a chronological summary of discussions and meetings that lead to the above set of final alternatives, a map depicting the FINAL recommended ARDS and a matrix capturing all the ARDS comments received and MCDOT's responses.

We appreciate the time and expertise you have provided on the Midcounty Corridor Study and look forward to working together in developing the environmental document.

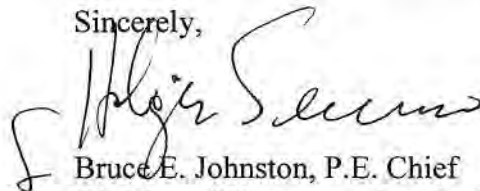
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A concurrence form is enclosed for your signature. Should you have any questions regarding the study, please feel free to contact Mr. Greg Hwang, the Project Manager, at 240-777-7279. Thank you for your continuing support and participation in the MCS.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Johnston", written over the word "Sincerely,".

Bruce E. Johnston, P.E. Chief
Division of Transportation Engineering

BEJ:mwc

Enclosures

cc: Greg Hwang, MCDOT
Rick Adams, RK&K

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

___ **Concurs (without comments)** ___ **Concurs (w/ minor comments)** ___ **Does Not Concur**

Comments / Reasons for Non-Concurrence:

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: _____

November 29, 2010

Montgomery County Department of Transportation

Midcounty Corridor Study (MCS)
Alternatives Retained for Detailed Study (ARDS)

THE MODIFICATIONS TO THE JUNE 2010 ARDS RECOMMENDATIONS

This document supplements the June 2010 *Draft Alternatives Retained for Detailed Study* (ARDS) document to provide the following modifications to the recommendations presented in the June 2010 ARDS document:

- (1) Retain Alternative 4 Modified (Brink-Wightman-Snouffer School-Goshen-Muncaster Mill) and drop Alternative 4 (Goshen-Wightman-Brink).
- (2) Retain Master Plan Alignment Northern Terminus Options A, B and D and drop Option C.

These modifications reflect the consensus that were reached in the discussions with the environmental agencies, beginning with the circulation of the June 2010 ARDS document, and followed by ARDS comments from agencies and stakeholders, a September 15, 2010 meeting and the revised ARDS recommendations dated October 15, 2010 and November 5, 2010.

The following discussion summarizes the progression from the original recommendations contained in the June 2010 ARDS document to the final suite of the Alternatives Retained for Detailed Study presented herein

The June 2010 ARDS Recommendations

The original recommendations, contained in the June 2010 ARDS document, consisted of the following:

Alternatives recommended for detailed study:

- Alternative 1, No Build;
- Alternative 2, Transportation Systems Management/Travel Demand Management;
- Alternative 4, Goshen-Wightman-Brink;
- Alternative 5, MD 355 with Service Roads;
- Alternative 8, Master Plan Alignment from Watkins Mill Road Northward;
- Alternative 9, Master Plan Alignment; and
- Master Plan Alignment Northern Terminus Options A and C.

Alternatives NOT recommended for detailed study:

- Alternative 3, Montgomery Village-Wightman-Brink;
- Alternative 6, MD 355-Lower & Upper Watkins Mill- Master Plan Alignment;
- Alternative 7, MD 355-Middlebrook-Master Plan Alignment;
- Alternative 10, Muncaster Mill-Snouffer School-Wightman-Brink;
- Alternative 11, Montgomery Village-Stedwick-Upper Watkins Mill-Master Plan Alignment; and
- Master Plan Alignment Northern Terminus Option B.

Modifications to the ARDS Recommendations

Alternative 4 (Goshen-Wightman-Brink)

As presented in the June 2010 ARDS document, Alternative 4 and Alternative 10 both propose a (4) four-lane highway along their entire length. Alternative 4 and Alternative 10 would improve the horizontal and vertical geometry of Brink Road and Wightman Road to satisfy MCDOT's design guidelines, and widen the corridor to four lanes. These proposed improvements are identical under both alternatives. Alternative 4 and Alternative 10 both assume the following three roadway improvements that are programmed as separate Montgomery County Capital Improvement Projects (CIP):

- (1) Approved CIP 501107 – Widening of Goshen Road to four lanes divided between Snouffer School Road and Midcounty Highway,
- (2) Approved CIP 501109 – Widening of Snouffer School Road to (5) five lanes undivided between Centerway Road and Woodfield Road (MD 124), and
- (3) Pending CIP 501119 - Widening of Snouffer School Road to (4) four lanes divided between Alliston Hollow Way and Centerway Road.

The only improvements that are not common to both alternatives include the addition of auxiliary lanes on the 0.3-mile portion of existing Midcounty Highway between Goshen Road and Montgomery Village Avenue with Alternative 4, and an one-mile dualization of Muncaster Mill Road between Woodfield Road and Shady Grove Road with Alternative 10.

In the June 2010 ARDS document, MCDOT recommended retaining Alternative 4 and dropping Alternative 10. Since the improvements proposed under these two alternatives were very similar, MCDOT did not consider it necessary to carry both alternatives forward. Additionally, there was a concern that the retention of two alternatives along Brink-Wightman would create the perception that we were stacking the deck in favor of a Brink-Wightman solution. Out of the two alternatives, we preferred Alternative 4 over Alternative 10 because Alternative 4 would better satisfy the purpose and need (fewer conflict points, shorter travel time), would have no conflicts with traffic at Montgomery County Airpark Industrial Park, would result in fewer environmental impacts in almost every category, and would affect fewer properties.

In response to the circulation of the June 2010 ARDS document and the October 15, 2010 response letter modifying the original ARDS recommendations, several environmental agencies expressed a concern that Alternative 10 should be retained for detailed study in addition to Alternative 4. The rationale for this request included:

- (1) Alternative 10 results in fewer stream impacts than Alternative 4;
- (2) The proposed improvements along Alternative 10 could help further achieve the transportation needs of the project;
- (3) Retaining both alternatives would ensure that Alternative 10 could serve as a back-up in the event that Alternative 4 was subsequently found to have a fatal flaw.

One agency recommended that portions of the two alternatives be combined, and some agencies concurred in retaining Alternative 4 while dropping Alternative 10.

After careful consideration of these requests, MCDOT modified the ARDS recommendations as follows:

- Combine Alternative 4 and Alternative 10 into a single alternative (new **Alternative 4 Modified, Brink-Wightman-Goshen-Snouffer School-Muncaster Mill**) which is recommended for detailed study.
- Drop Alternative 4 and Alternative 10.

With the combined alternative, traffic on the Brink-Wightman-Snouffer School-Muncaster Mill corridor will have multiple options to access other major corridors such as I-270, the ICC, MD 355 and MD 115. By diverting traffic to multiple corridors, Alternative 4 Modified has the potential to result in less congestion on Snouffer School Road than would have occurred with Alternative 10, and less congestion on Goshen Road than would have occurred with Alternative 4, potentially making this alternative superior to both Alternative 4 and Alternative 10 in terms of accommodating the projected traffic growth. The environmental and property impacts of Alternative 4 Modified is expected to be comparable to Alternative 10 because Alternative 4 Modified differs from Alternative 10, by the addition of widening a 0.3-mile section of existing Midcounty Highway between Goshen Road and Montgomery Village Avenue. In retaining Alternative 4 Modified, there is no need to also retain Alternative 4 or Alternative 10 because Alternative 4 Modified provides additional transportation benefits with only an incremental increase in impact and cost compared to Alternative 10. Retaining Alternative 4 Modified would give us added flexibility to recombine portions of the alternative in the unlikely event fatal flaws are subsequently identified along individual segments of the alternative. Alternative 4 Modified also meets objectives of fairness and streamlining by having only one alternative in the Brink-Wightman corridor.

Master Plan Alignment Northern Terminus Options

The Master Plan Alignment Northern Terminus Options presented in the June 2010 ARDS document include three options for connecting Alternatives 8 and 9 to the future Snowden Farm Parkway, which will be built by the developers of Clarksburg Village and Arora Hills that is scheduled to be open to traffic by the end of 2011. Option A follows the Master Plan alignment which has been reserved through the All Souls Cemetery and Seneca Crossing Local Park. Option B was developed to minimize impacts to Dayspring Creek and parkland by incorporating a direct crossing of North Germantown Greenway Stream Valley Park and then following existing Brink Road and Ridge Road. Option C was intended to reduce the acreage of impact to North Germantown Greenway Stream Valley Park by shifting the alignment to the western edge of the Park.

MCDOT originally recommended retaining Options A and C and dropping Option B. Option B was not recommended for detailed study because the alignment does not result in a direct connection to Snowden Farm Parkway, contains numerous driveways along Brink Road resulting in conflicts between local and through traffic, requires traffic from two different highway corridors to share a 1.4-mile portion of Brink Road and a 0.5-mile portion of Ridge Road, is more circuitous than either Option A or Option C, and impacts 14 residential properties, potentially displacing one of them.

The Maryland National Capital Park and Planning Commission (M-NCPPC) subsequently advised that Option C would result in the greatest impact to high quality park resources, including state rare plant species, Dayspring Creek headwaters, and forest interior dwelling species habitat. M-NCPPC also recommended two additional options, Option B Modified and Option D. Option B Modified would improve the operational characteristics of Option B by providing a direct link to Snowden Farm Parkway which is the same as Option C and eliminating the dog-leg movement along Ridge Road. Option D (see enclosed map) was recommended as a means to reduce park impacts by crossing North Germantown Greenway Stream Valley Park on a crossing that is furthest removed from Dayspring Creek, while preserving a consistent level of access control along the entire alignment.

After further evaluation, MCDOT concluded Option C be dropped due to its great impact to high quality park resources and also developed Option A Modified and Option C Modified with intension to reduce the impact on North Germantown Greenway Stream Valley Park and Dayspring Creek by shifting the alignment to the eastern edge of the park toward the rear of the Brink Road residential properties. These options were presented at a September 15, 2010 meeting with the environmental agencies. Option B Modified was recommended to not be retained at the same meeting due to community impacts, traffic conflicts resulting from driveways, and two highway corridors sharing the 1.4-mile portion of Brink Road. Option B Modified and Option C Modified were subsequently determined infeasible due to conflicts with the proposed Orchard Run subdivision on the west side of Ridge Road, and MCDOT's October 15, 2010 letter to the environmental agencies recommended they will not be retained for detailed study.

MCDOT's ARDS recommendations for the Master Plan Alignment Northern Terminus Options are modified as follows:

- Drop Option C for the reasons noted above.
- Retain Option A, which will include evaluation of Option A Modified within North Germantown Greenway Stream Valley Park to reduce park impacts.
- Retain Option B and Option D since both options follow the least objectionable crossing of North Germantown Greenway Stream Valley Park, and both options received support from the environmental agencies.

The Final ARDS Recommendations

With the revisions discussed in this document, the final suite of alternatives recommended by MCDOT are as follows:

Alternatives recommended for detailed study (see enclosed map):

- Alternative 1, No Build;
- Alternative 2, Transportation Systems Management/Travel Demand Management;
- Alternative 4 Modified, Brink-Wightman-Goshen-Snouffer School-Muncaster Mill;
- Alternative 5, MD 355 with Service Roads;
- Alternative 8, Master Plan Alignment truncated at Watkins Mill Road;
- Alternative 9, Master Plan Alignment; and
- Master Plan Alignment Northern Terminus Options A, B, and D.

Alternatives NOT recommended for detailed study:

- Alternative 3, Montgomery Village-Wightman-Brink;
- Alternative 4, Goshen-Wightman-Brink;
- Alternative 6, MD 355-Lower & Upper Watkins Mill- Master Plan Alignment;
- Alternative 7, MD 355-Middlebrook-Master Plan Alignment;
- Alternative 10, Muncaster Mill-Snouffer School-Wightman-Brink;
- Alternative 11, Montgomery Village-Stedwick-Upper Watkins Mill-Master Plan Alignment; and
- Master Plan Alignment Northern Terminus Option C.

Montgomery County Department of Transportation (MCDOT)
Midcounty Corridor Study (MCS), Alternatives Retained for Detailed Study (ARDS)

Agency Comments and MCDOT Responses

November 29, 2010

Agency	Reviewer	Comment	MCDOT Response
M-NCPPC	Dan Hardy 8/31/10 letter	Support retention of Alts 1, 2, 4, 5, 8 & 9. Support dropping Alts 3, 6, 7, 10 & 11.	We appreciate your support of our recommendations.
M-NCPPC	Dan Hardy 8/31/10 letter	Recommend modifications to Northern Terminus Option B and a new Northern Terminus Option D.	Option B Modified has not been retained. M-NCPPC recently approved a subdivision west of Ridge Road that would block a portion of the Option B Modified alignment. However, original Option B has been retained. Option D has also been retained.
M-NCPPC	Dan Hardy 8/31/10 letter	The study team should consider value pricing (i.e., toll collection) to reduce reliance on auto travel.	Tolling will be evaluated, but it is dependent on having sufficient access control to limit access to a few points where toll collection would be feasible and equitable.
M-NCPPC	Dan Hardy 9/24/10 email	Concur with dropping Option C. We favor Option D over Option B as it would reduce resource impacts to Dayspring Creek while providing a reasonable resolution of the study team concerns regarding additional traffic and driveway conflicts associated with the portion of Option B along Brink Road. Staff available to assist with resource identification along Option D.	Option C has been dropped. Both Option B and Option D have been retained. The study team will seek M-NCPPC input on Option D during detailed studies.
M-NCPPC	Doug Redmond 8/30/10 memo to Dan Hardy	Option C would have less park impact than Option A, but more impact to Dayspring Creek, Forest Interior Dwelling species habitat, state rare plants, and Dayspring Silent Retreat.	Option C has been dropped.
M-NCPPC	Doug Redmond 8/30/10 memo to Dan Hardy	An easterly option such as Option B or D would avoid the Dayspring Creek headwaters and is recommended for further study.	Both Options B and D have been retained for detailed study.
M-NCPPC	Doug Redmond 8/30/10 memo to Dan Hardy	The upper portion of Dayspring Creek stream valley contains an exceptional bedrock stream with low rock outcrops, waterfalls, and plunge pools uncharacteristic of other county streams, as well as seeps and wetlands which support diverse flora.	The quality of the Dayspring Creek stream valley has been noted. As a result, Options B and D have been retained, and Option C has been dropped.

Montgomery County Department of Transportation (MCDOT)
Midcounty Corridor Study (MCS), Alternatives Retained for Detailed Study (ARDS)

Agency Comments and MCDOT Responses

November 29, 2010

Agency	Reviewer	Comment	MCDOT Response
M-NCPPC	Doug Redmond 9/15/10 meeting	The Option B/D crossing of North Germantown Greenway Park is the only alignment which reduces the impacts of the Master Plan alternatives on the Park.	Both Option B and Option D have been retained.
M-NCPPC	Mary Dolan and Tina Schneider 8/30/10 memo to Dan Hardy	Of Northern Terminus Options A, B, and C, Option B would have the least impact on high quality and unique natural resources in the Park.	Option B has been retained for detailed study.
M-NCPPC	Mary Dolan and Tina Schneider 8/30/10 memo to Dan Hardy	Recommend modifications to Option B and new Option D.	Modified Option B has not been retained because M-NCPPC recently approved a subdivision that would block a portion of the alignment. Option D has been retained.
State Highway Administration	Mary Deitz and Reena Mathews 9/2/10 letter	Agrees with ARDS recommendations.	Thank you for your concurrence.
State Highway Administration	Mary Deitz and Reena Mathews 9/2/10 letter	For alternatives that impact state roads, SHA requests detailed analysis of right-of-way and operational impacts.	Both issues will be addressed in the forthcoming environmental document.
State Highway Administration	Mary Deitz and Reena Mathews 9/2/10 letter	Low-cost transit improvements should be included with all alternatives.	Transit function will be investigated for all retained alternatives.
City of Gaithersburg	Greg Ossont 7/14/10 letter	This is a much needed project. The City has no objection to retaining Alts 1, 2 & 4.	Thank you for your continued involvement in the study.
City of Gaithersburg	Greg Ossont 7/14/10 letter	Concerned with retention of Alt 5 which would direct more traffic to the already failing Montgomery Village Ave/MD 355 intersection, and may impact development plans within City limits.	During detailed study, the study team will give attention to these concerns.

Montgomery County Department of Transportation (MCDOT)
Midcounty Corridor Study (MCS), Alternatives Retained for Detailed Study (ARDS)

Agency Comments and MCDOT Responses

November 29, 2010

Agency	Reviewer	Comment	MCDOT Response
City of Gaithersburg	Greg Ossont 7/14/10 letter	Concerned that Alt 8 would direct additional traffic to Montgomery Village Ave, MD 355, and Watkins Mill Road; create potential cut-through traffic on Christopher Ave and Russell Ave; and impact neighborhoods and natural resources for the widening of existing Midcounty Highway from Goshen to Montgomery Village Ave.	During detailed study, the study team will give attention to these concerns.
City of Gaithersburg	Greg Ossont 7/14/10 letter	Concerned that Alt 9 would impact City neighborhoods, natural resources, and Blohm Park. Look forward to reviewing results of further studies.	During detailed study, the study team will give attention to these concerns, and will coordinate subsequent studies with the City.
USACE	Steve Elinsky 8/31/10 letter	Recommend retaining Alt 10 due to lower impact on aquatic resources.	Alternative 4 Modified, which is a combination of Alt 4 and Alt 10, is being retained.
USACE	Steve Elinsky 8/31/10 letter	Portions of Alt 4 can be combined with Alt 10.	Alt 4 has been combined with Alt 10 to produce Alternative 4 Modified. The impacts will be comparable to the impacts of Alt 10.
USACE	Steve Elinsky 8/31/10 letter	Northern Terminus Options A and C impact higher quality aquatic resources than Option B, with Option C impacting the highest quality resources. Recommend retaining Options A and B, and eliminating Option C.	Option A has been retained because it is shown on the County Master Plan. Option B has been retained at the request of the environmental agencies because it is the least objectionable crossing of North Germantown Greenway Park. Option C has been dropped.
USACE	Steve Elinsky 8/31/10 letter	USACE continues to have concerns about Alts 8 and 9. USACE is confident that other alternatives, or combinations, would satisfy the need.	The study team will evaluate the benefits and detriments of all alternatives retained for detailed study, including the degree to which they satisfy the purpose and need.
USACE	Steve Elinsky 9/15/10 meeting	Could the emergency exit from Montgomery Airpark Industrial Park to Woodfield Road be improved to reduce the number of turning movements to and from the Industrial Park on the Snouffer School Road portion of Alt 10?	Allowing traffic to use this exit would route industrial park traffic through the parking lot of a small, existing shopping center, causing safety and economic impacts (see page 79 of the ARDS document).

Montgomery County Department of Transportation (MCDOT)
Midcounty Corridor Study (MCS), Alternatives Retained for Detailed Study (ARDS)

Agency Comments and MCDOT Responses

November 29, 2010

Agency	Reviewer	Comment	MCDOT Response
USACE	Steve Elinsky 10/22/10 email	Alt 10 should be retained. USACE believes any concerns about congestion at the industrial park can be addressed.	Alt 10 has been incorporated into Alternative 4 Modified, and traffic conflicts at the industrial park will be studied under this alternative.
EPA	Barbara Rudnick 8/30/10 email	EPA has serious concerns about impacts to Great Seneca Creek.	Avoidance/minimization techniques such as bridging, retaining walls, and narrowing the cross section will be evaluated along all alternatives.
EPA	Barbara Rudnick 8/30/10 email	EPA would like to retain Alt 10 as a fall-back solution, should Alt 4 be found to have fatal flaws.	Alternative 4 Modified is a combination of Alt 4 and Alt 10. The combined alternative could be scaled back if fatal flaws are identified along individual segments of the alternative.
EPA	Barbara Rudnick 8/30/10 email	Alt 7 will be analyzed through the study of other alternatives (i.e. Alts 8 and 9). It should be noted that alternatives can be combined to avoid a segment of an alternative having a fatal flaw.	Alt 7 will not be studied as a stand-alone alternative, but the environmental document will note that the Master Plan Alignment could be truncated at Middlebrook Road.
EPA	Barbara Rudnick 8/30/10 email	Recommend dropping Northern Terminus Option C. Recommend retaining Options A and B, provided only existing roads are utilized north of Brink Road.	Option C has been dropped. Option B has been retained and will utilize existing Brink Road and Ridge Road. Option A has been retained, but incorporates an alignment on new location through All Souls Cemetery. This alignment has been reserved by its designation on the County Master Plan.
EPA	Barbara Rudnick 9/15/10 meeting	If Alt 10 has potential problems concerning the number of turns at the industrial park, incorporate the improvements needed to address this concern into the County's capital improvement project for Snouffer School Road.	With Alternative 4 Modified, the turning movements at the industrial park will be studied and appropriate measures proposed to reduce conflicts between local traffic and regional through traffic.
EPA	Barbara Rudnick 10/22/10 email	Supports USACE's 10/22/10 email, in which USACE recommended retaining Alt 10.	Alt 10 has been incorporated into Alternative 4 Modified.

Montgomery County Department of Transportation (MCDOT)
Midcounty Corridor Study (MCS), Alternatives Retained for Detailed Study (ARDS)

Agency Comments and MCDOT Responses

November 29, 2010

Agency	Reviewer	Comment	MCDOT Response
MDE	Paula Carlson 9/1/10 letter	No objection to dropping Alts 3, 6, & 11. Recommend dropping Option C.	Thank you for your concurrence in dropping these alternatives.
MDE	Paula Carlson 9/01/10 letter	Recommend retaining Alts 7, 10, and Northern Terminus Option B.	Alt 7 will not be a stand-alone alternative, but the environmental document will note that the Master Plan Alignment could be truncated at Middlebrook Road. Alt 10 has been incorporated into Alternative 4 Modified. Option B has been retained.
MDE	Paula Carlson 9/15/10 meeting	Several alternatives are being retained which would widen existing highways. Why then does MCDOT have concerns with including the widening of a portion of Brink Road under Option B?	Option B is one of several Northern Terminus Options to the Master Plan Alternatives (Alts 8 & 9). Alts 8 and 9 would have no driveways or entrances anywhere else along the alignment. Therefore, the 1.4-mile segment with driveways would not be as safe as the remainder of the alternative. Furthermore, it is desirable to have consistency in the design, cross section, and access control throughout a major highway corridor to promote appropriate driver speed and response to the conditions that are likely to be encountered.
MDE	Paula Carlson 10/01/10 letter	Recommend retaining Alts 7, 10, and Option B. Would like to see further study of Option D.	Alt 7 will not be a stand-alone alternative, but the environmental document will note that the Master Plan Alignment could be truncated at Middlebrook Road. Alt 10 has been incorporated into Alternative 4 Modified. Options B and D have been retained.

Midcounty Corridor Study
Modified Alternatives Retained for Detailed Study (ARDS) Recommendations

DISTRIBUTION LIST

November 29, 2010

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