

July 8, 2004

MEMORANDUM

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SUBJECT: ICC Comments

The Maryland State Highway Administration recently prepared maps that delineate two options for the ICC including Corridor I – Master Plan Alignment and Corridor II – Northern Alignment. The purpose of this memorandum is to provide comments from the Community-Based Planning Division concerning the recently prepared corridor options for the ICC.

SUMMARY OF COMMENTS

The following items summarize the comments from the review of this stage of the planning for the ICC.

1. In Corridor 1, grading for the highway at the interchanges and storm water management facilities extends beyond the 300-foot right-of-way.
2. Corridor 2 changes the function of the MD 28/198 connector into a limited access six-lane highway (the ICC).

3. In the Corridor 2, the Spencerville D Option is the least disruptive of the four sub-options because it does not cross MD 198, and it does not cut off local road access. In the Corridor II Option, the combinations of the three groups, Spencerville, Burtonsville and Fairland, have differing impacts depending on which options are connected. A combined alignment of Spencerville D, Burtonsville B, and Fairland B has the fewest impacts of any other combination in terms of property acquisition, displacements and the least amount of relocation of local roads, including MD 198.
4. SHA should include an option for an urban-diamond interchange (or a similar alternative with a smaller footprint) for the Georgia Avenue interchange so that the ICC crosses MD 97 below grade rather than above grade.
5. Corridor 2 has significant community impacts in the southeast quadrant of Olney. The most severe community impact is located in the area north of Norbeck Road and east of Georgia Avenue. The southeast quadrant has low densities, a large-lot development pattern, and sensitive headwaters.
6. Option C in the Upper Rock Creek area passes through two existing communities, Cashell Estates and Winters Run. This route would effectively eliminate Cashell Estates, one of the oldest residential communities in the planning area, as an intact residential neighborhood.
7. Connections between communities need to be substantially improved and incorporated into the final ICC alignment. Specifically bikeways have been omitted in the Shady Grove and Fairland areas.
8. The impact of noise from the ICC should be incorporated as soon as possible in the design of the ICC. As an example, communities along Shady Grove Road are already impacted by roadway noise and there are land use and grading constraints to constructing noise barriers.

GENERAL COMMENTS

The ICC Corridor Study is a work in progress. Our previous memorandum dated May 2004, commented on options contained in the *Draft Preliminary Socio-Economic and Land Use Technical Report* dated May 2004. The comments in this memorandum are based on review of 1" to 300' scale, colored maps dated June 2004. The June maps are different from the May maps. For example, in some of the Spencerville options, the May maps had "local" bridges in Corridor 2 over the ICC to facilitate local circulation. The June maps have fewer bridges in the Spencerville options.

Corridor I is the Master Plan Alignment shown in the Fairland, Cloverly and White Oak Master Plans. Impacts to the local communities should be minimal, because the highway preceded development, whereas impacts would be greater in Corridor II where a six-lane limited access highway passes through existing communities not planned to accommodate the ICC. Development along Corridor I, because the alignment and

interchanges were established on area master plans, was setback an appropriate distance from the 300-foot right-of-way. Development built along the master plan right-of-way was assumed to be setback sufficiently so there would be little or no impact from the future highway. The road network serving subdivisions was planned so that none crossed the highway right-of-way.

Analysis of the maps indicates that the premise of minimal impact is not necessarily correct. Grading for the highway at the interchanges and storm water management facilities extends beyond the 300-foot right-of-way. There are impacts to the adjacent communities, such as homeowner's common open space containing storm water management facilities, and along the back yards of houses parallel to the highway. In every case where the grading occurs on homeowners' open space, the Homeowners Association and individual homeowners are affected. Another impact of Corridor I occurs along proposed interchanges, such as Briggs Chaney Road, that were not shown on master plans.

SPECIFIC COMMENTS – EASTERN COUNTY AREA

Corridor 1 – Master Plan Alignment

Corridor I is located in the Cloverly, Fairland and White Oak Master Plans, and it was shown in the previous 1981 Eastern County and 1968 Fairland-Beltsville Master Plans. In general, development approved after the 1960s is setback from the right-of-way and no local streets cross the right-of-way. Local traffic is not disrupted by the alignment except at interchanges.

Interchanges: Briggs Chaney - There are problems and community impacts at two interchanges in the Fairland Master Plan area, US 29 and Briggs Chaney. The Briggs Chaney interchange was not shown either in the 1981 Eastern County Master Plan or the 1997 Fairland Master Plan. SHA had been considering an interchange during the previous (1993-97) ICC study. The Cross Creek development, which traverses the County line, contains a substantial segment of the Master Plan Alignment including the proposed Briggs Chaney interchange. During the subdivision approval process for Cross Creek (1997-98), the SHA requested that land be placed in reservation for both the interchange and the main section of the ICC.

The 1997 Fairland Master Plan did not show an interchange, but it did show a local park north of Briggs Chaney Road and south of the proposed highway. During the subdivision process, the applicant agreed to locate and dedicate parkland along Briggs Chaney Road where the facility would be accessible to existing and new communities. The Planning Board, in setting aside the reservation for the interchange and road during the subdivision process, agreed to an alternative location for the local park based on the interchange design at that time. The developer agreed to place the needed land in reservation for the interchange. Subsequent to the Planning Board's approval, SHA decided to drop the interchange, and acquired needed land from the developer for the right-of-way not including the interchange and approximately 20 acres landlocked by the proposed highway. SHA then released land in the vicinity of the interchange from

reservation. The Planning Board approved a revised development plan including adjustments to the local road network and park. The parkland was to be dedicated to the M-NCPPC.

The SHA is again proposing an interchange. This interchange isolates and cuts the dedicated local park in half. The interchange design cuts off an older road, Dogwood Lane, and forces development that currently has direct access to Briggs Chaney Road to exit the community and reach Briggs Chaney Road in a roundabout way by way of reconstructed local roads. It is unclear from the drawing if SHA is proposing to construct the interior road connections as part of the ICC project.

Interchanges: US 29 - The design of the US 29/ICC interchange (Fairland Master Plan area) must accommodate the US 29/Briggs Chaney Road interchange, which is currently under construction. Because of the closeness between the US 29/ICC interchange with two other US 29 interchanges, Briggs Chaney and Fairland, the ICC interchange has to accommodate weaving movements on and off all three interchanges. The plan indicates a multilevel ramping system measuring from fifty to sixty feet in the air. Much more land is being taken than was considered earlier this year. SHA has advised that it is still less than footprint shown on the reserved area.

A Pre-preliminary Plan of subdivision went before the Planning Board in May 2004. The applicant consulted SHA and used the interchange design current as of March. A few weeks after the Planning Board session, the SHA informed the applicant that the interchange required more land. The interchange shown in the June maps takes more than half of the property.

Cut and fill lines indicate the extent to which disturbance will intrude into lots and common open space in the Avonshire and Tanglewood communities. The cut and fill line along Avonshire needs to be further verified, as it appears to run through townhouses, yet there is no indication of any property acquisition. Avonshire lost all the trees in their common open space and required retaining walls to accommodate grades associated with the US 29/Briggs Chaney Road interchange. More grading and retaining walls will be necessary to accommodate the expanded ICC/US 29 interchange.

Grading outside the Right-of-Way - Grading outside the right-of-way will impact houses in Tanglewood that back up to the ICC segment between US 29 and Briggs Chaney Road. Staff notes that the businesses in the Autopark on the opposite side of the right-of-way are less affected than the residential properties along this segment. The grading does not affect a regional storm water management facility on the Autopark side, but affects the back of houses as well as adding a storm water management facility adjacent to houses.

North Sherwood Forest, approved in the 1980s, is located along the segment between New Hampshire Avenue and Layhill Road (Cloverly Master Plan area). The development specifically placed community open space and storm water management facilities between houses and the right-of-way to provide additional buffering against the

ICC. The grading from the highway now affects these areas. The grading proposes using the existing storm water management facilities to mitigate impacts of the road. It is unclear if the reconstructed existing storm water management facilities will treat runoff from the existing residential development and the proposed highway.

Other Comments - The proposed highway segments separate the natural/hard surface trail network in the Paint Branch Stream Valley Park located in Fairland, Cloverly and White Oak Master Plan areas, thereby reducing public access to the parks.

The June maps note Fairland Elementary School (Fairland Master Plan area) as a closed school. The school is currently leased to a private school and will be necessary again after the lease is ended.

Corridor 2 – Northern Alignment

Option II is not a planned option and crosses through existing and planned communities in the Cloverly and Fairland Master Plan areas. There are segments of the road through the Eastern County where the multiple options address the various impacts. In general, the options that run south of MD 198 are the most damaging to the existing communities.

Layhill Road to New Hampshire Avenue - This segment is located in the Cloverly Master Plan area and follows the alignment of the recently constructed MD 28/198 connector. This design changes the function of MD 28/198 into a limited access six-lane highway (the ICC). There are two communities, Hampshire Greens and Llewelyn Fields, both built in the 1990s for which the developer was required to dedicate road right-of-way for the MD 28/198 connector. Both communities have direct access to the connector and to a regional bike path system built along MD 28/198 and New Hampshire Avenue. The change in road function to a limited access highway requires the removal of all access points along the proposed ICC. The southern portion of Llewelyn Fields had one access point to the MD 28/198 connector. A note on the June maps states that SHA has acquired the entire portion since the homes would not be allowed access to a limited access highway and there were no other points of access.

Access for Hampshire Greens is also eliminated. The new cul-de-sacs deny access to the highway and to the existing bikeway system.

Eastern County between New Hampshire Avenue to County Line - There are three groups of options in Eastern County, east of New Hampshire Avenue: the Spencerville Options, the Burtonsville Options and the Fairland Options. These three groups can be combined in various ways to connect the segment of the ICC between New Hampshire Avenue and the County line.

There is a difference between the design of the options in the May and June maps. In the May maps, some local roads were bridged over the ICC. The June maps indicate that the options provide local access differently to minimize impacts or reduce costs (acquisitions and bridges). The following chart compares the May and June maps with respect to the Spencerville and Burtonsville combinations.

Spencerville Group (Cloverly Master Plan area) - All the Spencerville options address the relationship between the ICC and MD 198. Some run parallel, some cross MD 198 and some relocate MD 198 south or north. The options that cross or relocate MD 198 create a dislocated local road network. Many of the Spencerville options involve various solutions for dealing with Good Hope Road as a primary local road (6 alternatives in May, 3 in June). Bridges alleviate some of the impacts to the local roads and houses. The relocation of Good Hope Road alleviates other impacts and changes local access to the road network.

Thompson Road is broken into two culs-de-sac in some of the options, forcing the southern community to travel further to reach a through road or the Briggs Chaney Elementary School. The other community affected by the relocation of MD 198 is Parrs Ridge. Where MD 198 is left intact or bridged, Parrs Ridge suffers less impact. When MD 198 is relocated or the local roads are not bridged, the local road network serving Parrs Ridge is rerouted forcing residents to take a longer route to reach a through road.

Spencerville D is the least disruptive of the four options because it does not cross MD 198 and does not cut off local road access.

May	June
Spencerville A to Burtonsville A Good Hope Road over ICC	DROPPED
Spencerville A to Burtonsville A Good Hope Road under ICC	Spencerville A to Burtonsville A Good Hope Road under ICC ICC south of MD 198
Spencerville A to Burtonsville B Good Hope Road under ICC	This option not shown, but a note states study is still looking at Spencerville A to Burtonsville A ICC over Good Hope
Spencerville A to Burtonsville B Good Hope Road Relocated	Spencerville A to Burtonsville B Good Hope Road Relocated
Spencerville B to Burtonsville A Good Hope Road under ICC	Spencerville B to Burtonsville A Good Hope Road under ICC
Spencerville B to Burtonsville A Good Hope Road over ICC	DROPPED
Spencerville B to Burtonsville B	Spencerville B to Burtonsville B
Spencerville C to Burtonsville A	Spencerville C to Burtonsville A
Spencerville C to Burtonsville B	Burtonsville C to Burtonsville B
Spencerville D to Burtonsville B	Spencerville D to Burtonsville B

Burtonsville Group (Fairland Master Plan area) - There are two options in the Burtonsville Group, Burtonsville A and B that connect to Spencerville near Thompson Road. The major difference between these two options is the number of property acquisitions between the US 29/ICC interchange and the connection to the Spencerville options.

Burtonsville A runs south of MD 198, crosses MD 198 east of Peach Orchard Road (Peach Orchard/Allnut subdivision owned by the State) and then swings south of MD 198. There are 17 acquisitions along this segment. Burtonsville B stays north of MD 198, crosses Batson Road and connects to the US 29 interchange north of the PEPCO right-of-way and MD 198. The B Option never crosses MD 198 and therefore affects far fewer properties. Options A and B connect to the US 29/ICC interchange at the same location.

In comparison to the property acquisitions in Option A, Option B involves four acquisitions. Option B also provides bridging of all local roads and does not disrupt the local road network. Burtonsville B has a lesser impact than Burtonsville A in terms of property acquisition, grading and dislocation of local roads.

The interchange proposal for the ICC and US 29 is the same for both Burtonsville options. Although there are a number of property acquisitions around the interchange, those involving businesses affect properties already partially taken for the US 29 interchange, such as Shemin's Nursery, and the Beaver and Yang Properties. The proposed combination ramp and access to Bell Road on the west side of the interchange may not work well for the Bell Road community and the very large nursery operation, Bell's Nursery, that serves a regional market via tractor-trailers.

Fairland Group (Fairland Master Plan area) - There are two Fairland Options, A and B. The major difference between A and B are the number of property acquisitions. Fairland A and B have slightly different alignments through the proposed Fairland Golf Course Community project. One alignment runs south of the PEPCO right-of-way and would take more of the proposed houses, as well as affecting the lots within the Birmingham Manor subdivision. Option B runs north of the PEPCO right-of-way and affects fewer houses as shown in the design of the Fairland Golf Course Community. The Golf course is unaffected.

The combinations of the three groups, Spencerville, Burtonsville and Fairland, have differing impacts depending on which options are connected. A combined alignment of Spencerville D, Burtonsville B, and Fairland B has the fewest impacts of any other combination in terms of property acquisition, displacements and the least amount of relocation of local roads, including MD 198.

SPECIFIC COMMENTS - GEORGIA AVENUE AREA

Olney Comments

In the Georgia Avenue Team area, the ICC Master Plan Alignment passes through three master plan areas: Upper Rock Creek, Olney and Aspen Hill, while Corridor 2 – Northern Alignment follows the same alignment as the Corridor 1 between Shady Grove and Georgia Avenue (MD 97) but starts to deviate from the Master Plan Alignment east of Georgia Avenue. Corridor 2 does not pass through the Aspen Hill Master Plan area.

Corridor I - Master Plan Alignment

Since most of the right-of-way for Corridor 1 had been preserved through dedication or purchase, there are fewer instances of severe disruptions and unexpected community impacts. Generally, the most significant adverse impacts occur where housing developments were built before the ICC master plan right-of-way was reserved and the proposed route cuts through existing communities. When the proposed route shifts from the centerline of the reserved right-of-way, generally to avoid some stream or environmentally sensitive area, the impact is heightened on the adjoining community where the road shift reduces the expected buffer while the community on the other side gains a bigger buffer than was expected.

Georgia Avenue Interchange - The proposed ICC passes over Georgia Avenue in both Corridor 1 and Corridor 2 within the master plan ROW preserved for this interchange.

Both the 1980 Olney Master Plan and the current Draft Plan envision the area north of Norbeck Road in Olney as a gateway to the more rural areas of northern Olney. Norbeck Road is the boundary between the more densely developed areas to the south and the suburban low-density character of Olney to the north. The Draft Olney Master Plan emphasizes incorporation of landscaping and other features along the road that would screen the view of residential developments from the road to maintain a green Corridor 1 in this stretch. The Draft Plan recommends seeking “features that enhance the rural gateway concept for southern Georgia Avenue approaching Olney.”

The proposed ICC includes a modified cloverleaf interchange at Georgia Avenue with the ICC passing over Georgia Avenue. The visual impact of such an interchange with associated ramps raised above Georgia Avenue may not be compatible with the Master Plan’s objective to keep this section of Georgia Avenue more in keeping with the low-density, semi-rural character of the area around this interchange.

MD 97 is a ridge road that generally forms the boundary between the Rock Creek and Northwest Branch watersheds. During the development of the MD 97 interchange with MD 28, SHA determined that depressing Relocated MD 28 beneath MD 97 was less expensive than constructing a new bridge above existing MD 97. The depressed option also met with substantially greater community acceptance. SHA should include a diamond interchange option (or a similar alternative with a smaller footprint) for the Georgia Avenue interchange so that the ICC crosses MD 97 below grade rather than above grade.

Corridor 2 – Northern Alignment

Corridor 2 is the new northern route for the ICC starting east of the Georgia Avenue overpass. Its most severe community impact in the Olney area is in the Southeast Quadrant (SEQ) of Olney—the area north of Norbeck Road and east of Georgia Avenue—in the Olney Master Plan. The SEQ has very low densities (a mix of one unit per two to five acres) and a large-lot development pattern that serves as a buffer and transition between the Olney Town Center and the Sandy Spring/Ashton area to the east.

Corridor 2 has two options between Georgia Avenue and the Norbeck Knolls area around Barn Ridge Drive: Norbeck Option A; and Norbeck Option B. Corridor 2 has significant community impacts in the SEQ.

Corridor II has 13 residential displacements in the SEQ area while Option B shows 14. In addition to these displacements, both options will have significant impacts on the adjoining properties during construction and the number of displacements may increase as the plans are finalized. The maps and the Draft EIS also need to be updated to show subdivisions in the proposed alignment that have been approved by the Planning Board, but construction of houses has not started.

Corridor 2 will eliminate the current direct connections from Barn Ridge Drive and Whitehaven Road to Norbeck Road and replace them with a single, more circuitous access via a bridge over the proposed ICC. This would impact more than 30 houses in Norbeck Knolls (Barn Ridge Drive) and close to 40 houses in Norwood Farms (Whitehaven Road).

Corridor II (the most northerly alignment) would adversely impact (visual, noise) the rustic character of Batchellors Forest Road, which is designated as an interim rustic road and recommended for rustic road status in the Draft Olney Master Plan. This option would also severely impact two other properties: 1) Willow Grove, a historic property whose current, at grade access through more than 500 feet of wooded area would be modified to include a bridge over the six-lane ICC; and 2) the Gandel property, which is mostly wooded and is proposed to house the Washington Christian Academy's future home. The proposed Norbeck Option B bisects the Gandel property precluding the possibility of its use as a future site for the Washington Christian Academy. Corridor 2 will also have significant visual and noise impacts in the SEQ area, and therefore severely erode the quality of life in this enclave of quiet residential developments with significant environmental resources on private land.

Upper Rock Creek Comments

Corridor 1 and Corridor 2 are identical in the Upper Rock Creek Master Plan area. The ICC traverses the Upper Rock Creek Master Plan area on an alignment depicted on the Upper Rock Creek Master Plan. There are two options, Option A and Option C. Option A runs east from Shady Grove Road through parkland in the Mill Creek stream valley. The crossing of North Branch is within parkland and bisects an area identified in the Legacy Open Space Plan as the North Branch Buffer Area, which includes a significant biodiversity area. There are no interchanges with existing roads in the Upper Rock Creek Master Plan area. There are grade separations at Redland Road, Needwood Road and Muncaster Mill Road. A connection to Midcounty Highway is also planned.

Redland Road – Both options require grading along Redland Road in front of Shady Grove Presbyterian Church to facilitate a grade separation carrying Redland Road over the ICC. The grading appears to eliminate the vehicular entrance to the church as well as disrupting a landscaped area.

Option A – Upper Rock Creek

Needwood Road – Option A is shown traversing the Woodlawn property away from a portion of the property that has been in reservation for a road right-of-way and in an area assumed by the owners of the property to be developable. The portion of the property traversed by the ICC is recommended in the Plan for public acquisition, to be used for a connecting trail between Needwood Road and the ICC trail.

Option C – Upper Rock Creek

Option C is a variation that avoids the extensive parkland impacts. From Redland Road, the proposed right-of-way swings sharply northward, through the Cashell Estates community, to use the alignment proposed for the Midcounty Highway Extended. Option C crosses Rock Creek at a point where the park is significantly narrower than in the Mill Creek vicinity. It traverses private property in the vicinity of Needwood Road, and it then rejoins the Master Plan Alignment just west of Muncaster Mill Road. Like Option A, there are no interchanges. There are grade separations at Redland Road, Olde Mill Run and Needwood Road.

Option C is not shown in the Upper Rock Creek Area Master Plan. The Plan recommends retaining the existing rights-of-way and lane configurations for the ICC and the Midcounty Highway Extended (M-83). The Plan also recommends completing the federal Environmental Impact Statement process for the ICC and states that two options evaluated in the Transportation Policy Report can be considered consistent with the Plan, if the ICC cannot be built as envisioned. Neither of those options considers a six-lane road on the M-83 alignment. Option C passes through two existing communities, Cashell Estates and Winters Run. No six-lane road has been shown through Winters Run. No road has ever been planned through Cashell Estates.

Cashell Estates – Option C requires the taking of 17 homes and a business in Cashell Estates, along Garrett, Overhill and Nedham roads. This route would effectively eliminate Cashell Estates - one of the oldest residential communities in the planning area - as an intact neighborhood. While no property takings are shown in Winters Run, maps show significant amounts of grading to the backyards of properties on Heatherford Court, Pilgrims Cove and Farmingdale Court. In some cases this grading is shown on a significant portion of the yard.

Winters Run Culs-de-sac at Olde Mill Run - The map indicates with a note that this option is under study. Because it eliminates Olde Mill Run as a through street in Winters Run, this option has the most significant community impacts of any option in the Upper Rock Creek Master Plan Area. The failure to show it is therefore particularly problematic. The creation of culs-de-sac on either side of the highway eliminates access to Muncaster Mill Road for a large segment of the Winters Run community. Residents now able to walk to schools and churches on Muncaster Mill Road would be forced to use their cars in order to reach those same destinations. More importantly, this option would permanently divide Winters Run into two enclaves, with no connection between them. The impact on this cohesive community would be severe.

SPECIFIC COMMENTS – I-270 CORRIDOR AREA

The proposed ICC traverses portions of the Shady Grove Sector Plan and the Gaithersburg Vicinity Master Plan. A new mixed-use community is recommended for the area surrounding the Shady Grove Metro Station in the vicinity of the I-370/ICC/Shady Grove Road interchange. Residential communities including Redland Station, Parkside Estates and parts of Mill Creek are affected by the alignment. The Corridor I - Master Plan Alignment and the Corridor II - Northern Alignment are in the same location in each of these planning areas. The following comments apply to both corridor options.

Shady Grove Sector Plan - Redland Station and parts of Mill Creek are currently bordered by Shady Grove Road and I-370. The proposed alignment will create a third barrier for these communities by cutting off their access to the rest of Mill Creek to the northwest and to the existing middle school, the future elementary school and a future neighborhood park. The ICC will create an isolated community surrounded by major highways and freeways.

The second community impacted by the ICC is Parkside Estates. This community is using the Mill Creek Stream Valley Park via a series of trails to access Redland Park and the Redmill Shopping Center. Redland Road and Shady Grove are the bordering streets that do not invite pedestrian access due to heavy traffic volumes and lack of continuous sidewalks. The corridor options do not indicate pedestrian connections at several stream valley crossings.

The pending Shady Grove Sector Plan recommends several pedestrian crossings to be provided in conjunction with stream crossings. These crossings are proposed in order to connect the west side communities to parks and schools on the east side of the ICC. Redland Station and parts of Mill Creek have two pedestrian connections shown under the ICC. The one closest to the I-370 interchange provides access to a future elementary school, a future neighborhood park and to the existing middle school.

The pedestrian crossing within Parkside Estates located between Shady Grove Road and Redland Road is recommended in order to provide community access to Redland Park and to give a safe and pedestrian-friendly connection within the community. Providing the community an alternative access through the stream valley versus walking along the heavily traffic volumes of Shady Grove Road and Redland is important.

Homeowner Association Open Space - Impacts to Homeowner Association open spaces are shown adjacent to Tupelo Drive and within Parkside Estates and Park Overlook. The significant loss of open space may require offsets for Homeowner Association open space.

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