



APPENDIX G

Cultural Resources Technical Report Volume 1: Overview and Effects Assessment December 2019



U.S. Department
of Transportation

**Federal Highway
Administration**

MDOT MARYLAND DEPARTMENT OF TRANSPORTATION
STATE HIGHWAY ADMINISTRATION

DRAFT

Project Updates

Update May 2020

The Cultural Resources Technical Report was produced in compliance with Section 106 of the National Historic Preservation Act. This report was provided to Section 106 Consulting Parties in January of 2020, in advance of the publication of the DEIS. The report is presented here as originally shared with consulting parties and does not reflect changes from comments received; the report will be updated and finalized as part of the FEIS. However, a number of key developments between January 2020 and March 2020 are summarized below.

The Commonwealth of Virginia Department of Historic Resources (DHR) completed the review of the Cultural Resources Technical Report, Volume 6. In a letter dated February 14, 2020, DHR concurred that Sites 44FX0374 and 44FX0379 are eligible for listing on the National Register of Historic Places (NRHP) under Criterion D. DHR also concurred that sites 44FX3160 and 44FX3900 are not eligible for listing on the NRHP. In addition, they also agreed that the portion of Site 44FX0373 located within the study area does not contribute to the site's overall potential eligibility for listing on the NRHP. Additionally, DHR concurred that Sites 44FX0322, 44FX0326 and 44FX0377 should remain unevaluated for NRHP eligibility and no further archaeological investigation is necessary in the project's limits of disturbance for these sites.

In the letter, DHR also informed MDOT SHA that they do not agree that Sites 44FX0381 and 44FX0389 are not eligible and recommended that both sites as individually eligible for listing on the NRHP under Criterion D. Additionally, DHR does not endorse the decision to list Sites 44FX0373, 44FX0374, 44FX0379, 44FX0381, 44FX0389, 44FX0380, 44FX0390, and 44FX0227 as an archaeological district. MDOT SHA will continue consultation with DHR, NPS, and other parties on resolving the disagreement regarding eligibility and the district.

The Maryland Historical Trust (MHT) completed the review of the six-volume Cultural Resources Technical Report. In a letter dated March 12, 2020, MHT concurred with MDOT SHA's evaluation determinations of the archaeological resources investigated in Maryland during the study. MHT also agreed that further Phase I and Phase II archaeological investigations are warranted in the specified areas stated in the Volume 4 of the Cultural Resources Technical Report. They further agreed that further consultation and coordination are needed to address the identification and treatment of cemeteries that may be impacted by the undertaking. Additionally, MHT concurred that significant submerged cultural resources are unlikely to be located within the corridor and underwater archaeological investigations are not warranted at this time.



In the letter, MHT also concurred with MDOT SHA's determination that proposed undertaking will have an adverse effect on historic properties in Maryland. In addition, MHT agreed with the specific findings stated in MDOT SHA's submittal letter dated January 10, 2020 and presented in Volume 1 of the Cultural Resources Technical Report.

Since the distribution of the draft Cultural Resources Technical Report, MDOT SHA completed additional site visits and consultation with the Cabin John Citizens Association and Gibson Grove AME Zion Church regarding Moses Hall and the associated cemetery. As a result, it is apparent the report currently undercharacterizes the extent of the resource, and more graves and archaeological foundation traces exist than are described in the report. In addition, multiple consulting parties provided additional information regarding the Moses Hall and Cemetery, also known as the Morningstar Tabernacle No. 88, as a result of the January 2020 distribution of the technical report. In response to these comments, MDOT SHA has conducted additional field and documentary research and believes sufficient information is available to make an eligibility determination on this property and evaluate effects as a historic property. MDOT SHA will complete a determination of eligibility and effect for this property in consultation with MHT and consulting parties, and continue consultation regarding avoidance, minimization, and treatment of the resource, including potential burials within the limits of disturbance. MDOT SHA will continue to consult, evaluate, and propose avoidance, minimization, and treatment measures on the Moses Hall-related resources.

On March 16, 2020, other consulting parties concluded their review of the six-volume Cultural Resources Technical Report. Consulting party comments have been received and will be reviewed and addressed via ongoing consultation.

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1 INTRODUCTION

1.1 Overview

The Federal Highway Administration (FHWA), as the Lead Federal Agency, and the Maryland Department of Transportation State Highway Administration (MDOT SHA), as the Local Project Sponsor, are preparing an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act (NEPA) for the I-495 & I-270 Managed Lanes Study (Study). The Study evaluates potential transportation improvements to portions of the I-495 and I-270 corridors in Montgomery and Prince George's Counties, Maryland, and Fairfax County, Virginia. MDOT SHA will be following a Public-Private Partnership (P3) Program delivery method by seeking a private concessionaire to design, build, finance, operate, and maintain the project.

The following six-volume cultural resources document was prepared in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations at 36 CFR Part 800. Section 106 requires federal agencies such as FHWA, to consider the effects of projects they carry out, approve, or fund on historic properties. Therefore, MDOT SHA and FHWA identified historic properties within the undertaking's area of potential effects (APE); assessed effects to those properties; and is consulting with the Maryland Historical Trust (MHT), representing Maryland's State Historic Preservation Officer, and additional consulting parties throughout the Section 106 process. In addition, the report has been prepared to support and inform the EIS.

Section 106 of the NHPA is a procedural requirement consisting of several steps for federal agencies to consider effects to historic properties resulting from undertakings. MDOT SHA, through delegated authority, assists in performing several of the steps on behalf of the FHWA. The process is initiated by determining the undertaking and identifying appropriate consulting parties. An APE is established in consultation with the State Historic Preservation Officer SHPO(s), wherein historic properties, should they exist, may be affected by the proposed undertaking. The MDOT SHA and FHWA then identify historic properties within the APE, and, if not previously evaluated, determine their eligibility for the National Register of Historic Places (NRHP), in consultation with consulting parties. Historic properties are districts, sites, buildings, structures, or objects meeting criteria for inclusion in the register. Effects to such properties resulting from the proposed undertaking are then assessed. Adverse effects occur where there is an expected diminishment of those qualities that qualify a property for the NRHP. If adverse effects are anticipated, resolution of effects can occur through a binding agreement document that stipulates

measures to avoid, minimize, and/or mitigate adverse effects to historic properties. Where undertakings are unusually complex, and/or effects cannot be fully determined, a programmatic agreement (PA) may be used to fulfill Section 106. Because of the Study's geographic scope, complexity, and limited design information, MDOT SHA and FHWA informed consulting parties of the intention to complete Section 106 via a PA resolving known anticipated adverse effects, and stipulating ongoing consultation requirements as design advances. Accordingly, this report documents the identification and evaluation efforts to date, but additional efforts and consultation are expected to occur under the anticipated PA terms being developed in consultation with participating consulting parties.

This report, entitled *Cultural Resources Technical Report*, is Volume 1 and consists of an overview of the status of Section 106 review for the project, and an assessment of effects to historic properties. Chapter 1 includes a description of the Study corridors, followed by a summary of the Purpose and Need, and a description of the alternatives evaluated. Chapter 2 presents a review of the consultation undertaken thus far as part of the Section 106 process. Chapter 3 is a summary of the effects assessment on historic properties located within the APE. Chapter 4 concludes with next steps for the Section 106 process consisting of additional archaeological investigations and the development of the Section 106 PA.

Volume 2 Consists of the *Archaeological and Historic Architectural Gap Analysis and Assessment* (Hutchins-Keim et. al. 2018) (Gap Analysis), a review of existing cultural resources information and studies of the APE, including a methodology for additional identification and evaluation of historic properties. At the time of the Gap Analysis development, cultural resources affected by the study in the Commonwealth of Virginia were assumed to be addressed separately by the Virginia Department of Transportation (VDOT) for their ongoing project to extend the American Legion Memorial Bridge High Occupancy Toll (HOT) Lanes to the George Washington Parkway, called the 495 Express Lanes Northern Extension (NEXT) Project.

Since the completion of the Gap Analysis, the APE in the Virginia area was revised in May 2019. Because the revised APE extends beyond the VDOT project APE, MDOT SHA considered additional effects from the Study on cultural resources in Virginia. The rest of the APE was subsequently updated in November 2019 to ensure the buffer of 250 feet on either side of the widest proposed limits of disturbance (LOD).

The Architectural Resources Evaluation Technical Report (Volume 3) documents architectural resources identification efforts. This study includes all "above-ground" (non-archaeological) resources including resource types such as parks and parkways. A total of 329 resources were identified within the APE. Of these, 328 were divided into multiple batches to facilitate review by MHT and additional consulting parties. The National Park Service (NPS) made a preliminary determination that Greenbelt Park (PG:67-69) was eligible for the purposes of Section 106 during a separate consultation process between the NPS and MHT. A total of 51 "above-ground" (non-archaeological, architectural) historic properties (NRHP-eligible or listed resources) are located within the APE.

Volume 4 consists of the *Phase I Archaeological Investigation for the I-495 & I-270 Managed Lanes Study, Montgomery and Prince George's County, Maryland and Fairfax County, Virginia*. Archaeological field evaluation was completed for 39 of the 54 areas identified in the Gap Analysis, along with three proposed stormwater management features. Of these, seven survey areas were found to contain a total of 12 archaeological sites, two sites were evaluated at the Phase II level (Volume 5), and an additional site

is recommended for further study. The results of the Phase I archaeological survey, as well as recommendations for additional Phase I and Phase II studies, are presented in Volume 4.

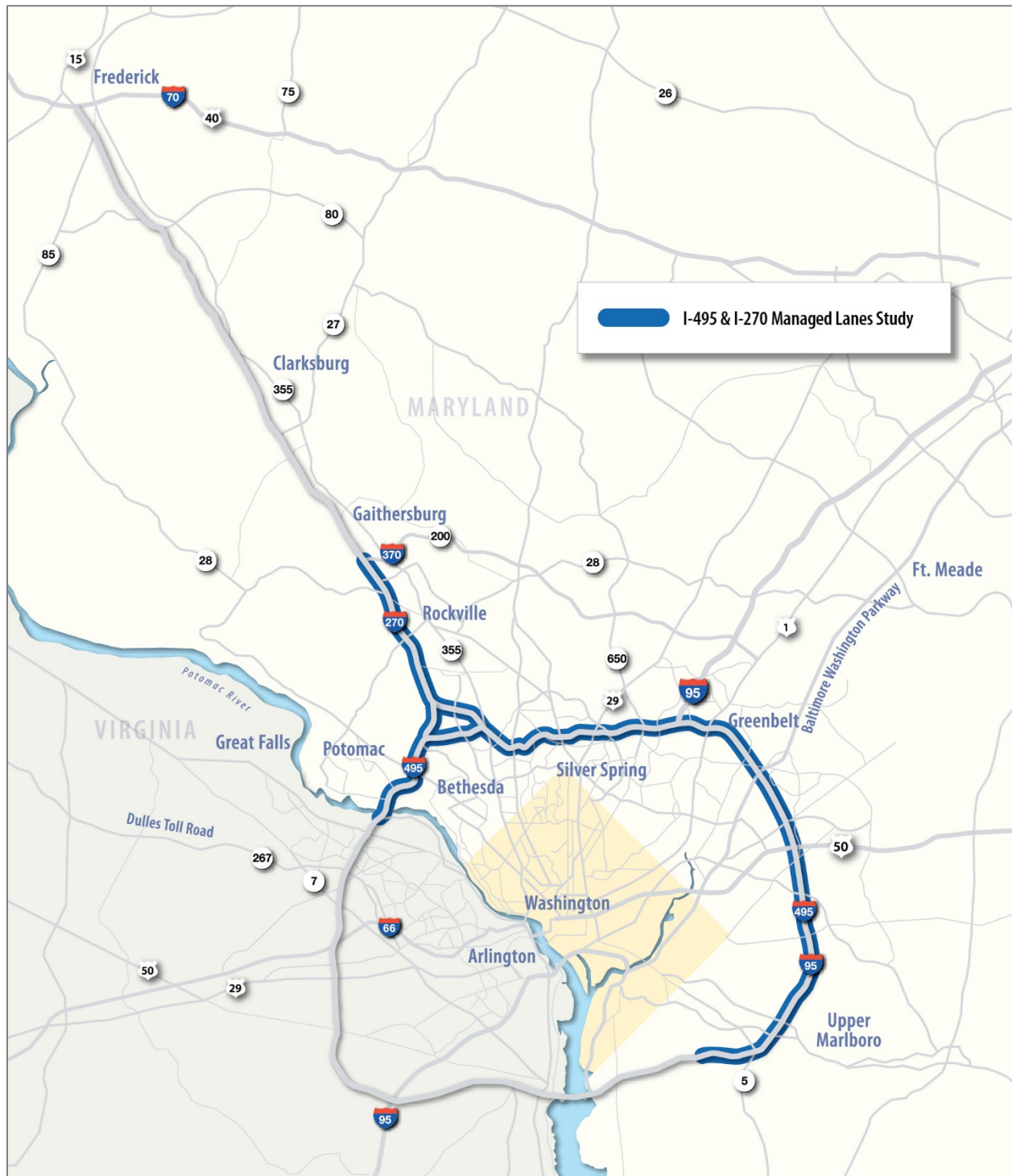
Volume 5 is the *Phase II Archaeological Evaluation at Sites 18PR750, 18MO749, and 18MO751 for the I-495 & I-270 Managed Lanes Study Project, Prince George's and Montgomery Counties, Maryland*, which presents the NRHP evaluation results for three sites within the APE. Site 18PR750 was identified by a prior study of the I-495 corridor, and sites 18MO749 and 18MO751, located within lands administered by NPS, were identified by the Phase I investigation included as Volume 4. The investigation recommended that site 18PR750 is not eligible for listing in the NRHP, and that sites 18MO749 and 18MO751 are eligible for listing in the NRHP.

Volume 6 is entitled *Phase I Archaeological Survey, Intensive Phase I Archaeological Survey of 44FX0373, and Phase II Archaeological Evaluation at Sites 44FX0374, 44FX0379, 44FX0381, 44FX0389, 44FX3160, and 44FX3900 Within the George Washington Memorial Parkway for I-495/I-270 Managed Lanes Study, Fairfax County, Virginia*. This volume presents the results of archaeological survey and evaluation of various sites that may be impacted by the Study in Virginia. The investigation concluded that significant archaeological resources are present, including a proposed NRHP-eligible archaeological district (Dead Run Ridges Archaeological District).

1.2 Study Corridors

I-495 and I-270 in Maryland are the two most heavily traveled freeways in the National Capital Region, each with Average Annual Daily Traffic volume up to 260,000 vehicles per day in 2018 (MDOT SHA, 2019). I-495 is the only circumferential route in the region that provides interregional connections to many radial routes in the region, such as I-270, US 29 (Colesville Road), I-95, MD 295 (Baltimore-Washington Parkway), US 50 (John Hanson Highway), and MD 5 (Branch Avenue). I-270 is the only freeway link between I-495 and the fast-growing northwest suburbs in northern Montgomery County and the suburban areas in Frederick County. In addition to heavy commuter traffic demand, I-495 provides connectivity along the East Coast, as it merges with I-95 in Maryland for 25 miles around the east side of Washington, D.C. (**Figure 1-1**).

Figure 1-1: Study Corridors



1.3 Study Purpose and Need

The purpose of the Study is to develop a travel demand management solution(s) that addresses congestion and improves trip reliability on I-495 and I-270 within the Study limits and enhances existing and planned multimodal mobility and connectivity. The Study will address the following needs:

- **Accommodate Existing Traffic and Long-Term Traffic Growth** - High travel demand from commuter, business, and recreational trips results in severe congestion from 7 to 10 hours per day on the Study corridors, which is expected to deteriorate further by the planning horizon year of 2040. Additional roadway capacity is needed to address existing and future travel demand and congestion, reduce travel times, and allow travelers to use the facilities efficiently.
- **Enhance Trip Reliability** - Congestion on I-495 and I-270 results in unpredictable travel times. Travelers and freight commodities place a high value on reaching their destinations in a timely and safe manner, and in recent years, the study corridors have become so unreliable that uncertain travel times are experienced daily. More dependable travel times are needed to ensure trip reliability.
- **Provide Additional Roadway Travel Choices** - Travelers on I-495 and I-270 do not have enough roadway options for efficient travel during extensive periods of congestion. Additional roadway management options are needed to improve travel choices, while retaining the general-purpose lanes.
- **Accommodate Homeland Security** - The National Capital Region is considered the main hub of government, military, and community installations related to homeland security. These agencies and installations rely on quick, unobstructed roadway access during a homeland security threat. Additional capacity would assist in accommodating a population evacuation and improving emergency response access should an event related to homeland security occur.
- **Improve Movement of Goods and Services** - I-495 and I-270 are major regional transportation networks that support the movement of passenger and freight travel within the National Capital Region. Existing congestion along both corridors increases the cost of doing business due to longer travel times and unreliable trips. The effects of this congestion on the movement of goods and services is a detriment to the health of the local, regional, and national economy. Efficient and reliable highway movement is necessary to accommodate passenger and freight travel, moving goods and services through the region.

Additional roadway capacity and improvements to enhance reliability must be financially viable. MDOT's traditional funding sources would be unable to effectively finance, construct, operate, and maintain improvements of this magnitude. Revenue sources that provide adequate funding, such as pricing options, are needed to achieve congestion relief and address existing high travel demand.

Given the highly constrained area surrounding the interstates in the Study corridors, MDOT SHA recognizes the need to plan and design this project in an environmentally responsible manner. MDOT SHA will strive to avoid and minimize community, natural, cultural, and other environmental impacts, and mitigate for any unavoidable impacts at an equal or greater value. MDOT SHA will work with our federal,

state, and local resource agency partners in a streamlined, collaborative, and cooperative way to meet all regulatory requirements to ensure the protection of significant environmental resources. Any build alternatives will offset unavoidable impacts while prioritizing and coordinating comprehensive mitigation measures in or near the study area, which are meaningful to the environment and the community.

1.4 Alternatives Evaluated

Seven alternatives are being evaluated and compared in the technical reports supporting the EIS. These Screened Alternatives include Alternatives 1, 5, 8, 9, 10, 13B, and 13C and are illustrated in the typical sections shown in **Figure 1-2**.

The following terms are used in the description of the alternatives.

- **General Purpose (GP) Lanes** are lanes on a freeway or expressway that are open to all motor vehicles.¹
- **Managed Lanes** are highway facilities, or a set of lanes, where operational strategies are proactively implemented and managed in response to changing conditions.²
- **High-Occupancy Toll (HOT) Lanes** are High-Occupancy Vehicle (HOV) facilities that allow lower-occupancy vehicles, such as solo drivers, to use the facilities in return for toll payments, which could vary by time of day and level of congestion.¹
- **Express Toll Lanes (ETL)** are dedicated managed lanes within highway rights-of-way that motorists may use by paying a variably priced toll.³
- **High-Occupancy Vehicle (HOV) Lanes** are any preferential lane designated for exclusive use by vehicles with two or more occupants for all or part of a day, including a designated lane on a freeway, other highway or a street, or independent roadway on a separate right-of-way.⁴
- **Reversible Lanes** are facilities in which the direction of traffic flow can be changed at different times of the day to match peak direction of travel, typically inbound in the morning and outbound in the afternoon.¹

A. Alternative 1: No Build

The No Build Alternative, often called the base case, includes all projects in the 2040 financially Constrained Long-Range Plan (CLRP) for the National Capital Region adopted by the Metropolitan Washington Council of Governments - Transportation Planning Board. This includes other projects impacting the facilities that are subject to this Study. Specifically, the CLRP reflects the Purple Line which is currently under construction (Spring 2019), and the extension of the I-495 Express Lanes in Virginia from north of the Dulles Toll Road interchange to the American Legion Bridge (Virginia's 495 Express Lanes Northern Extension [NEXT] Project). Alternative 1 also includes the I-270 Innovative Congestion Management Contracts, which are providing a series of construction projects to improve mobility and safety at key points along I-270 targeted to reduce congestion at key bottlenecks along the corridor. All

¹ *National Cooperative Highway Research Program, Research Report 835, Guidelines for Implementing Managed Lanes.* Transportation Research Board. 2016

² https://ops.fhwa.dot.gov/publications/managelanes_primer/index.htm

³ https://www.fhwa.dot.gov/ipd/tolling_and_pricing/defined/demand_mgmt_tool.aspx

⁴ <https://ops.fhwa.dot.gov/freewaymgmt/hovguidance/glossary.htm>

improvements are being implemented within the existing roadway right-of-way and are anticipated to be completed by the end of 2019. While these improvements will improve mobility and safety, they will not address the long-term roadway capacity needs for the I-270 corridor. Routine maintenance and safety improvements along I-495 and I-270 are included in the No Build Alternative, but it does not include new capacity improvements to I-495 and I-270. Consistent with NEPA requirements, Alternative 1 will be carried forward for further evaluation to serve as a base case for comparing the other alternatives.

B. Alternative 5: 1-Lane, High-Occupancy Toll Managed Lanes Network

This alternative consists of adding one HOT managed lane in each direction on I-495 and converting the one existing HOV lane in each direction to a HOT managed lane on I-270. Buses would be permitted to use the managed lanes.

C. Alternative 8: 2-Lane, Express Toll Lane Managed Lanes Network on I-495 and 1-Lane Express Toll Lane and 1-Lane HOV Managed Lanes Network on I-270

This alternative consists of adding two ETL managed lanes in each direction on I-495, retaining one existing HOV lane in each direction on I-270, and adding one ETL managed lane in each direction on I-270. Buses would be permitted to use the managed lanes.

D. Alternative 9: 2-Lane, High-Occupancy Toll Managed Lanes Network

This alternative consists of adding two HOT managed lanes in each direction on I-495, converting the one existing HOV lane in each direction on I-270 to a HOT managed lane, and adding one HOT managed lane in each direction on I-270, resulting in a two-lane, managed lane network on both highways. Buses would be permitted to use the managed lanes.

E. Alternative 10: 2-Lane, Express Toll Lane Managed Lanes Network and 1-Lane HOV Managed Lane Network on I-270 Only

This alternative consists of adding two ETL managed lanes in each direction on I-495, retaining one existing HOV lane per direction on I-270, and adding two ETL managed lanes in each direction on I-270. Buses would be permitted to use the managed lanes.

F. Alternative 13B: 2-Lane, High-Occupancy Toll Managed Lanes Network on I-495 and HOT Managed Reversible Lanes Network on I-270

This alternative consists of adding two HOT managed lanes in each direction on I-495 and converting the existing HOV lanes in both directions to two HOT managed, reversible lanes on I-270. Buses would be permitted to use the managed lanes.

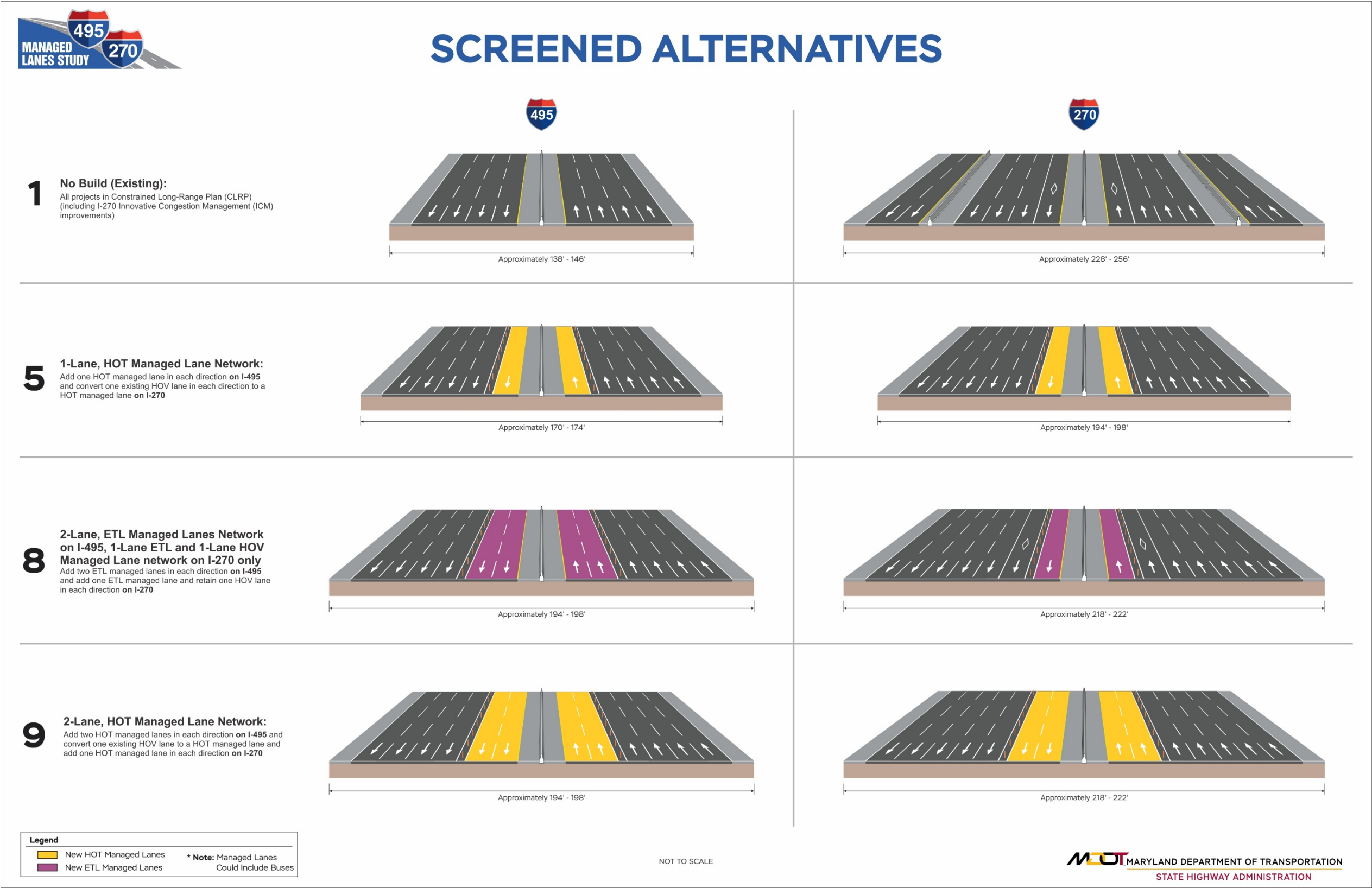
G. Alternative 13C: 2-Lane, ETL Managed Lanes Network on I-495 and ETL Managed, Reversible Lanes Network and 1-Lane HOV Managed Lane Network on I-270

This alternative consists of adding two ETL managed lanes in each direction on I-495 and retaining the existing HOV lanes in both directions and adding two ETL managed, reversible lanes on I-270. Alternative 13C would maintain the existing roadway network on I-270 with HOV lanes to allow for HOV travel while adding two managed, reversible lanes. Buses would be permitted to use the managed lanes.

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Figure 1-2: Typical Sections of Alternatives Considered

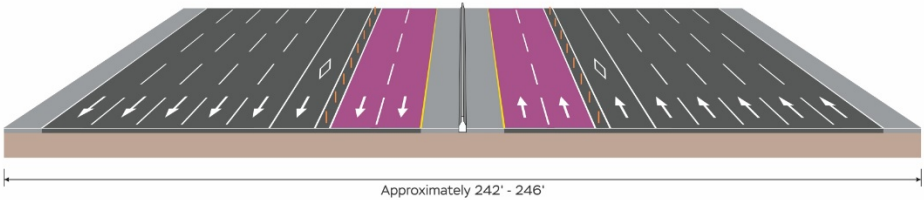
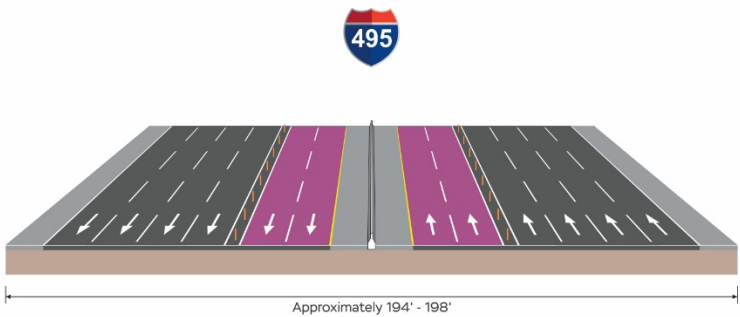




SCREENED ALTERNATIVES

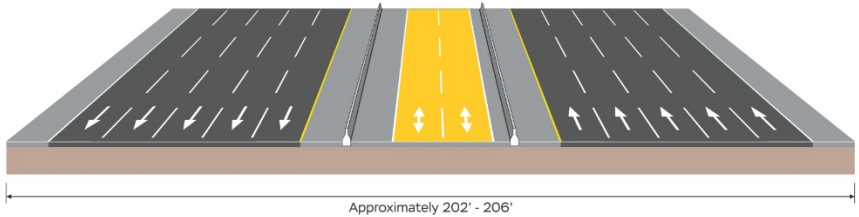
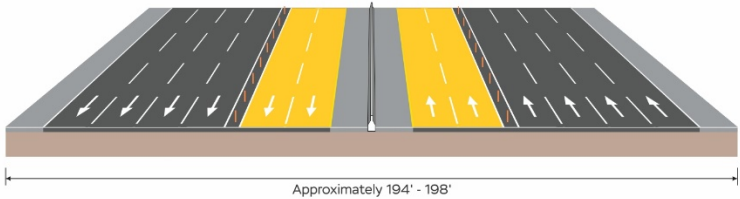
10

2-Lane, ETL Managed Lane Network and 1-Lane HOV Managed Lane Network on I-270 only
Add two ETL managed lanes in each direction on I-495 and on I-270 and retain one existing HOV lane in each direction on I-270 only



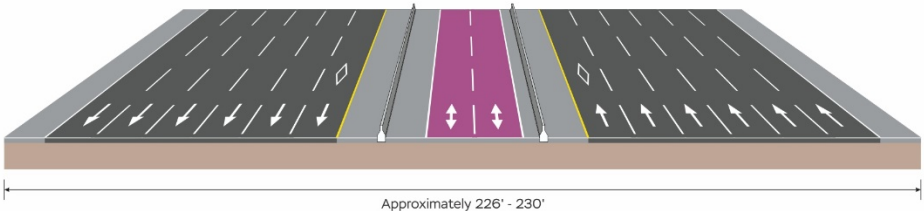
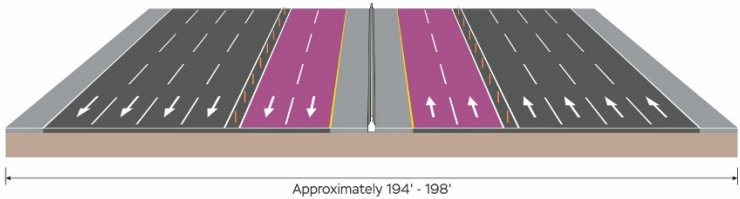
13B

2-Lane, HOT Managed Lane Network on I-495; HOT Managed, Reversible Lane Network on I-270:
Add two HOT managed lanes in each direction on I-495 and convert existing HOV lanes to two HOT managed reversible lanes on I-270 while maintaining GP lanes



13C

2-Lane, ETL Managed Lane Network on I-495; ETL Managed, Reversible Lane Network and 1-Lane HOV Managed Lane Network on I-270
Add two ETL managed lanes in each direction on I-495, maintain existing HOV managed lanes on I-270 and add two reversible ETL managed lanes on I-270



Legend

New HOT Managed Lanes

* **Note:** Managed Lanes Could Include Buses

New ETL Managed Lanes

NOT TO SCALE

2

2 SECTION 106 PROCESS

2.1 Section 106 Requirements and Procedures

The implementing regulations for Section 106, codified at 36 CFR Parts 800.3 through 800.7 identify four broad steps for Section 106 review, with numerous requirements at each step: Initiating the Process, Identification of Historic Properties, Assessment of Effects, and Resolution of Effects. Because of the complexity of the study, several aspects of these steps are occurring simultaneously and/or are at different stages of the process. The following discussion of consultation provides the current status of the Study's compliance with Section 106 requirements.

2.2 Consultation Initiation

The Study, as "a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency" and requiring multiple Federal "permits, license or approvals" is an undertaking as defined at 36 CFR Part 800.16(y). Because this undertaking may affect historic properties, it is subject to further review under Section 106.

FHWA notified the Advisory Council on Historic Preservation (ACHP) on March 26, 2018 of the Study. ACHP chose to participate in consultation in a letter dated May 22, 2018 (see **Appendix A of Volume 1** for consultation correspondence).

MDOT SHA, on behalf of and in coordination with FHWA, initiated the Section 106 process and presented the Study by letter to MHT, the Virginia Department of Historic Resources (DHR) and other consulting parties on April 12, 2018.

In 2018, MDOT SHA and FHWA continued invitation of additional parties to participate in the Section 106 compliance process for this undertaking (36 CFR Part 800.2[c][5] and 800.3[f]), including tribal, federal, state, and local governments, many of whom were included in the initial consultation letter. FHWA consulted with federally recognized tribes; this included sending letters on June 17, 2019 to Virginia tribes requesting their interests in both the States of Maryland and Virginia; MDOT SHA has an established notification procedure, coordinated with FHWA for federally recognized tribes who have already expressed an interest in Maryland. MDOT SHA also identified and invited additional parties in 2019. **Appendix B of Volume 1** lists all invited consulting parties who have either affirmatively responded, or who continue to be provided information as having clear property or jurisdictional relationship to the

Study regardless of participation. Additional consulting parties may be identified as the undertaking and Section 106 review process continues.

The Study involves multiple Federal Agencies, each of whom may have certain approval, permitting, or other actions subject to Section 106. 36 CFR Part 800.2(a)(2) allows that “some or all the agencies may designate a lead Federal agency” [to] “act on their behalf, fulfilling their collective responsibilities under section 106”. FHWA requested confirmation from the NPS, U.S. Army Corps of Engineers, U.S. Department of Agriculture, The U.S. Postal Service (USPS), The Federal Railroad Administration, The National Capital Planning Commission, the U.S. Coast Guard and the Department of Defense that FHWA could serve as the Lead Federal Agency for the Study. Each agency contacted confirmed that FHWA would serve as Lead Federal Agency. Ultimately the contacted agencies may or may not have a defined Section 106 undertaking that affects historic properties, due to evolving property and permitting needs, design advancement, or NRHP eligibility determinations of involved properties (i.e., if an involved agency’s required action would not affect historic properties, or the property affected by the study under their jurisdiction is not NRHP-eligible, such agencies would not have an undertaking with potential to affect historic properties).

Section 106 public involvement requirements (36 CFR Part 800.2[d][3]) are being fulfilled through the same processes used for general project outreach and NEPA compliance. Ongoing public outreach at Montgomery and Prince George’s County locations is providing Study and alternatives development information, including cultural resources information. The public also has opportunities to engage with the Study team and submit comments on the Study. Interested individuals, organizations, and public agencies provided input on the scope of the EIS during April 2018 open houses. Public workshops in July 2018 gathered comments and information to help inform the alternatives development process. Public workshops in April and May 2019 presented information about the seven Study Screened Alternatives, including the relationship of the study boundaries to previously identified historic properties. This information, along with an ArcGIS-based interactive map with historic property locations, is available to the public online on the project website (<https://495-270-p3.com>). Project hearings are planned in the Spring of 2020, and other public pop-up events are ongoing.

Three consulting parties meetings have taken place, on May 3 and November 13, 2018, and June 17, 2019, all attended by FHWA. The first meeting provided overviews of the Study and the Section 106 process for this undertaking. A draft schedule of activities was also presented. The second meeting provided general Study updates, an update on Section 106 efforts, and outlined the development of the proposed PA. The third meeting included general Study updates, historic properties status updates, a preliminary list of adversely affected properties, and the PA development outline. A fourth consulting parties meeting is anticipated in early 2020.

2.3 Identification Efforts

2.3.1 Area of Potential Effects

MDOT SHA, on behalf of and in coordination with FHWA, established the initial version of the Study’s APE by letter to MHT and other parties on April 12, 2018 (36 CFR Part 800.4[a][1]). MDOT SHA and consultant RK&K, LLP additionally met with MHT on April 18, 2018 to discuss the project, APE, and proposed Section 106 consultation process. The APE is the geographic area within which an undertaking may directly or indirectly cause alteration in the character or use of historic properties (36 CFR Part 800.16[d]). Because

the precise LOD were unknown at that time, FHWA and MDOT SHA developed a corridor study boundary (CSB), the envelope within which physical effects to historic properties were assumed to be possible. The CSB was defined as a line extending 300 feet from the centerline on either side of I-495 and I-270 within the study limits, expanding farther at certain interchanges. Within the CSB FHWA and MDOT SHA conducted archaeological survey to identify archaeological resources possibly subject to impact by the Study.

To capture anticipated visual, atmospheric, or audible effects, the APE generally encompassed an additional 250 feet on either side of the CSB. MHT accepted this APE without additional comments on May 17, 2018. DHR, which is the Virginia State Historic Preservation Office, indicated on April 17, 2018 their participation as a consulting party.

Since the original development of the APE, two modifications have been made. A revised APE in the Virginia area, along with summaries of MDOT SHA Section 106 responsibilities in Virginia, was presented to MHT, DHR, and additional consulting parties on May 14, 2019. Since completion of the Gap Analysis, MDOT SHA conducted additional constructability analysis for replacement of the American Legion Bridge and coordinated with VDOT and NPS on project evaluation needs. It was determined MDOT SHA would be responsible for certain project elements in Virginia to connect with VDOT's NEXT Project. As a result, the APE in the vicinity of the American Legion Bridge, Chesapeake and Ohio (C&O) Canal National Historical Park, and within Virginia, including within the George Washington Memorial Parkway NPS property was revised (**Appendix A of Volume 3**). Based on design evolution and in consideration of VDOT's NEXT project, the Study's APE in this area takes into account existing noise barriers and other factors that would shield adjacent properties from visual, atmospheric, or audible effects.

The APE was subsequently updated in November 2019 to ensure consistency of a 250-foot buffer of consideration on either side of the widest proposed alternative's LOD (Alt 10), to account for those areas where design advancement of the engineered LOD required this expansion of the APE. (**Appendix A of Volume 3**). MDOT SHA expects additional minor revisions to the APE going forward, as necessary to capture further design changes. MDOT SHA anticipates including a process for APE revisions in the project PA, as design advances under the concessionaire. **Table 2-1** summarizes the distinctions among "APE", "CSB" and "LOD" as used in this technical report.

Table 2-1: Comparison of APE, CSB, LOD terms

Term	Definition	Explanation
APE	Area of Potential Effects	The geographic boundaries where all effects to historic properties may occur, including effects to setting, feeling or viewshed that are not specific physical property impacts. This is the widest/most comprehensive boundary for evaluation of historic properties for the Study. The APE has been updated twice since initiation of the study. The initial APE consisted of the CSB (see below) plus an additional 250-foot buffer on either side of the CSB to evaluate atmospheric, non-physical potential effects. Architectural evaluation generally occurred within the APE. In May 2019 the APE was revised to reflect design advancement in the American Legion Bridge vicinity and in Virginia. The APE was again revised in November 2019

Term	Definition	Explanation
		to capture additional design advancement and where the LOD requires additional “buffer” to capture setting, feeling, and viewshed effects.
CSB	Corridor Study Boundary	Upon initiation of the Study, the CSB was used as an initial survey boundary in the absence of engineered alternatives. The CSB consists of a line extending 300 feet outside of centerline of I-495 and I-270 within the study limits. Prior to design advancement establishing an LOD (see below), it was assumed physical impacts may occur within the CSB. The CSB was generally used for the boundaries of archaeological study, with the exception of the American Legion Bridge and Virginia portions of the APE, where design development permitted greater accuracy.
LOD	Limits of Disturbance	Following engineering design advancement, MDOT SHA developed “limits of disturbance” for where physical construction impacts are likely to occur as a result of the alternatives under consideration. In general, the LOD is narrower than the CSB, and is a more accurate estimation of project impacts than the CSB. The LOD for Alternative 10, representing the widest “footprint” of the project under consideration was used to assess likely effects to properties.

2.3.2 Identification of Historic Properties within the APE

36 CFR Part 800.4 (a) and (b) requires consultation with the SHPO(s) regarding the scope of identification efforts for historic properties. To accommodate the large study area and number of properties requiring evaluation, including many post-World War II 20th Century properties expected to reach the 50 years of age consideration threshold during the course of the anticipated project, MDOT SHA developed Volume 2 of this report, the Gap Analysis (Hutchins-Keim et al. 2018) and submitted it to MHT for review and comment on August 8, 2018. The Gap Analysis presents a detailed analysis of the potential for Maryland archaeological and architectural historic properties that may be affected by the Study. The Gap Analysis was additionally shared with other consulting parties. The Gap Analysis includes an overview of previous surveys and recorded cultural resources within the APE; it evaluates the potential for encountering archaeological resources, provides for archaeological survey methodology, and includes recommendations for NRHP evaluations of historic architectural resources.

MHT responded with minor comments and agreed with the general approaches in the Gap Analysis on November 27, 2018 (**Appendix A of Volume 1**).

MDOT SHA, in consultation with MHT, committed to identify previously recorded and new resources constructed in or before 1978, to account for properties that may reach 50 years in age prior to the anticipated end of construction. Properties younger than 50 years in age are generally not considered for inclusion in the NRHP except in cases of exceptional significance.

2.4 Architectural Resources Evaluations

Because the APE identified a large number of post-World War II developments and property types associated with suburban development of the Washington, D.C. area, the Gap Analysis identified a need for additional historic context to consistently evaluate these resources. A draft *Suburbanization Historic Context Addendum (1961–1980), Montgomery and Prince George’s Counties, Maryland* (Suburbanization Context Addendum) was prepared and shared with consulting parties on October 19, 2018. The Suburbanization Context Addendum expands upon the coverage of suburbanization included in the *Suburbanization Historic Context and Survey Methodology: I-495/I-95 Capital Beltway Corridor Transportation Study, Montgomery and Prince George’s Counties, Maryland* (Volumes I and II) (November 1999, revised May 2000). The Suburbanization Context Addendum expands the time period covered by the original study, which originally ended in 1960. It includes historical trends, development patterns, suburban development systems, property types, and significance assessment considerations for suburban resources in Maryland, particularly in Montgomery and Prince George’s Counties. When relevant, the Study’s NRHP evaluations relied on these two contexts. MHT responded with minor comments on the Suburbanization Context Addendum and agreed with the general approach with their acceptance of the Gap Analysis on November 27, 2018. MHT and additional consulting party comments were addressed in a finalized Suburbanization Context Addendum in May 2019.

Of 329 resources identified, MDOT SHA submitted 328 architectural resource survey or evaluation forms to MHT and additional consulting parties for review and comment, a process begun on October 19, 2018. The NPS made its own preliminary eligibility determination for Greenbelt Park during the study efforts, and MDOT SHA defers to the NPS evaluation. Printed copies of each form and archival discs (with supporting files) were provided to MHT via rolling batch submittals, at which time the additional consulting parties received the forms for review and comment via links to an ArcGIS Online web map maintained by MDOT SHA, where full evaluation forms may be downloaded (<http://bit.ly/495-270-DOE>). The final batch was submitted on November 26, 2019. Comments were received from MHT and additional consulting parties and addressed as appropriate. MDOT SHA has completed eligibility evaluations of above-ground resources in the APE per the methodology described in the Gap Analysis; there are no eligibility findings where SHPO concurrence has not been obtained.

2.5 Archaeological Resources Evaluations

The Gap Analysis outlined an archaeological testing approach to those portions of the APE (i.e., the CSB) where direct physical impacts (specifically ground disturbance) were expected to occur. The corridor was divided into numerous survey areas, each with an assessment of archaeological potential and an associated methodology for investigations to identify archaeological historic properties, and to evaluate significance of known archaeological properties. Volume 4 of this report, the *Phase I Archaeological Investigation for the I-495 & I-270 Managed Lanes Study, Montgomery and Prince George’s County, Maryland and Fairfax County, Virginia* includes the results of these evaluations. Upon revision of the APE in May 2019 to include work in Virginia, MDOT SHA proposed additional archaeological methodologies for the Virginia portion of the APE to DHR. Archaeological evaluation in Virginia was not originally anticipated at the time the Gap Analysis was written. DHR responded on June 28, 2019, indicating no additional comments at this time on the scope as proposed by MDOT SHA. The work was additionally coordinated with NPS as part of an Archaeological Resources Protection Act (ARPA) permit for work within the George Washington Memorial Parkway property. While the majority of areas identified for

archaeological evaluation were surveyed in preparation of this technical report, a number of areas were not accessible, or require additional evaluation to determine the presence of NHRP-eligible sites (see Chapter 4 of this volume). Such areas will be identified for phased identification as part of the proposed PA, potentially as part of an archaeological treatment plan. The PA will additionally address archaeological evaluation requirements in response to design development and associated project activities (e.g. stormwater facilities, stream and wetland mitigation sites, etc.).

Approximately 67 archaeological resources are present within the APE. Fifty-seven of the resources were identified prior to the Study and an additional 10 newly identified sites were documented as a result of the Phase I archaeological investigation (see **Volume 4**). An intensive Phase I archaeological investigation and Phase II evaluations were conducted at seven resources in Virginia (**Volume 6**). In addition, Phase II evaluation studies were completed on one previously identified site (18PR750) and two newly identified sites (18MO749 and 18MO751) in Maryland (**Volume 5**). As a result of these investigations, three archaeological resources were recommended eligible for listing on the NRHP.

3

3 EFFECTS ASSESSMENT

MDOT SHA made an assessment for the effects of the undertaking on historic properties, located within the APE, by applying the criteria of adverse effect. An effect may occur when there is an alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the NRHP (36 CFR Part 800.16[1]). To be eligible for listing on the NRHP, historic properties (districts, sites, buildings, structures, and objects) must possess integrity of location, design, setting, materials, workmanship, feeling and association and meet at least one of the below four criteria:

- Criterion A – that are associated with events that have made a significant contribution to the broad patterns of our history; or
- Criterion B – that are associated with the lives of persons significant in our past; or
- Criterion C – that embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- Criterion D – that have yielded, or may be likely to yield, information important in prehistory or history.

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association (36 CFR Part 800.5[a][1]).

Examples of adverse effects (36 CFR Part 800.5[a][2]) include:

- (i) Physical destruction of or damage to all or part of the property;
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* (36 CFR Part 68) and applicable guidelines;
- (iii) Removal of the property from its historic location;

- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- (vii) Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

MDOT SHA has determined, on behalf of FHWA, that the screened alternatives, with the exception of Alternative 1: No Build, would have an adverse effect on historic properties. See below for a discussion of these findings for individual historic properties.

3.1 Historic Properties

A total of 51 known and newly determined-eligible architectural historic properties and three newly determined eligible archaeological historic properties were identified within the Study's current APE (**Table 2-2 and Appendix D of Volume 3; Volumes 5 and 6**). The LOD were used to assess potential physical effects, and potential visual, atmospheric, or audible effects were considered within the entire APE. The effect assessments found no adverse effect on 34 architectural historic properties, an adverse effect on 10 architectural historic properties and three archaeological historic properties. Effects cannot be fully determined on seven architectural historic properties and those properties will be subject to stipulations of the PA to avoid, minimize, or mitigate adverse effects as design advances.

3.1.1 Properties Experiencing Adverse Effect

Ten architectural historic properties (including parks and parkways) within the APE will be adversely affected by any alternative other than the no-build. All 10 architectural historic properties with an adverse effect fall within the widest proposed LOD (**Table 3-1** Error! Reference source not found.). No properties are proposed for complete demolition or destruction, but adversely affected properties will generally have contributing features of the property experiencing physical impacts of varying degrees. In addition, three archaeological historic properties will be adversely affected within the LOD of any alternative other than the no-build. None of the three archaeological historic properties would be completely destroyed but portions of each would likely be removed or destroyed. Adversely affected properties are discussed individually below.

Table 3-1: Historic Properties with Adverse Effect

MIHP#/DHR#	Name	Period of Significance	NRHP Criteria
PG:69-26	Baltimore-Washington Parkway	1942-1954	A, C
M: 12-46	Chesapeake and Ohio Canal National Historical Park	1828-1924	A, C, D

MIHP#/DHR#	Name	Period of Significance	NRHP Criteria
M: 35-61 and 029-0228 (Virginia)	George Washington Memorial Parkway/Clara Barton Memorial Parkway	1930-1966	B, C
PG:72-26 and PG:73-26	Glenarden Historic District	1939-1977	A
PG:67-69	Greenbelt Park	1945-1972 (for Mission 66 era)	A, C, D
M: 32-34	Indian Spring Club Estates and Indian Spring Country Club	1939-1957	A, B, C
M: 37-16	Metropolitan Branch, B&O Railroad	1866-1873	A, C
M: 36-1	National Park Seminary Historic District/Forest Glen/Walter Reed A.M.C. Annex	1894-ca. 1930	Unspecified
M: 36-87	Rock Creek Stream Valley Park, Units 2 and 3	1931-1970	A
M: 32-15	Sligo Creek Parkway	Unspecified	A, C
18MO749	C&O Canal Site 1*	Early Woodland	D
18MO751	C&O Canal Site 3*	1828-1924	A, C, D
(N/A)	Dead Run Ridges Archaeological District*	Late Archaic-Woodland	D

*Eligibility concurrence pending

A. Baltimore-Washington Parkway

The Baltimore-Washington Parkway, eligible under criteria A and C, will be adversely affected. The alternatives under consideration include modifications to contributing elements of the Parkway to accommodate a new interchange with I-495. Work is expected to include reconfiguring the existing interchange of I-495 and Baltimore-Washington Parkway; constructing direct access ramps to and from the managed lanes and the Baltimore-Washington Parkway; replacing the existing bridges carrying the parkway over I-495; constructing, operating, and maintaining stormwater management facilities; constructing a noise wall; and providing access for construction vehicles and materials.

LOD impacts are concentrated in two areas: a linear area along the Baltimore-Washington Parkway that extends approximately 3800 feet north of the interchange with I-495; and a linear area along the Baltimore-Washington Parkway that extends approximately 3000 feet south of the interchange with I-495. Activities in the LOD would consist of grading, tree removal, and landscape plantings; realigning the existing parkway to accommodate direct access ramps to and from the managed lanes; realigning the interchange with Southway and Greenbelt Road; replacing the bridge carrying Greenbelt Road over

Baltimore-Washington Parkway; constructing, operating, and maintaining stormwater management facilities; updating and installing signage; and access for construction equipment and materials.

Additional and/or elevated structure to accommodate managed lanes along I-495 at the Baltimore-Washington Parkway would likely diminish the integrity of the Parkway's setting and association as a designed scenic parkway.

B. Chesapeake and Ohio Canal National Historical Park

The C&O Canal National Historical Park, eligible under criteria A, C, and D, would be adversely affected.

Project activities at this location include access for construction vehicles and materials to build the new American Legion Bridge and remove the existing structure; the construction, operation, and maintenance of the realigned ramp from I-495 northbound to Clara Barton Parkway; the construction of a trail connection between a shared use path on the east side of the new American Legion Bridge and the C&O Canal towpath; the realignment of Rock Run; and the construction, operation, and maintenance of linear stormwater management features beneath the shoulders of I-495 mainline, south of the towpath.

The LOD are concentrated along the northbound and southbound lanes of the existing I-495 alignment and to the south of the C&O Canal towpath both west and east of the highway. In order to move construction vehicles and materials to and from the base of the American Legion Bridge, temporary bridge crossings would be built across the canal and towpath. The locations of these crossings as well as the access points on Clara Barton Parkway have been coordinated with NPS. Two bridges and access roads are necessary to provide safe movement of construction equipment to, from and around the construction site. Having two construction roads will also shorten the duration of construction. The temporary access road and temporary bridges would require the removal of trees, grading land, and placing quarry spalls to support the movement of heavy equipment. These activities would require the temporary closure of the canal towpath for the construction and removal of the grade separated crossings that would be in place during construction of the new American Legion Bridge, which is anticipated to last between four and five years.

The alternatives under consideration all include expansion of the American Legion Bridge within the park boundaries, increasing visual and physical intrusion into the setting of the park, resulting in diminishment of setting. Long-term construction access and staging is also required at the park, which will cause additional temporary diminishment of setting, feeling, and association for the duration of construction.

The park contains two archaeological historic properties that would also be adversely affected (C&O Canal Site 1 [18MO749] and C&O Canal Site 3 [18MO751]). Those sites are discussed separately in this section under "Archaeological Sites".

C. George Washington Memorial Parkway/Clara Barton Memorial Parkway

The George Washington Memorial Parkway/Clara Barton Memorial Parkway, eligible under criteria B and C, would be adversely affected.

Activities in Virginia include access for construction vehicles and materials to build the two new American Legion bridge structures and remove the existing structure; the construction, operation, and future maintenance of new direct access ramps to the managed lanes on I-495; and the installation, operation, and future maintenance of electrical conduit and signage to inform the traveling public of toll rates and operation of the facility. The LOD in Virginia are concentrated at two locations: in the quadrant southeast of the American Legion Bridge and along a small strip of land north of the westbound lanes of George Washington Memorial Parkway extending from west of the bridges at Dead Run to where the parkway approaches the existing interchange with I-495. Temporary lane closures during construction are possible.

The large area within George Washington Memorial Parkway southeast of the American Legion Bridge is needed to construct a switchback road that will be used to maneuver construction vehicles and materials up and down the steep grade along the bank of the Potomac River. To erect the new bridge, construction cranes will be placed in each of the four quadrants adjacent to the existing crossing. Construction barges in the river will reduce the need for additional impacts on land. Access to the construction area within George Washington Memorial Parkway will be from a temporary access road built within existing VDOT right-of-way.

Activities in Maryland consist of construction vehicle and material access beneath the grade-separated crossing with I-495 to accommodate the bridge replacement; the construction of a temporary access road to transport vehicles and materials to the American Legion Bridge construction site; and the construction, maintenance, and operation of a linear stormwater management feature that extends from the area currently maintained by MDOT SHA in a transportation use to an area within Clara Barton Parkway. The relocation of the I-495 interchange ramps is also required.

The LOD in Maryland are concentrated in three locations: extending approximately 1000 linear feet along the north side of Clara Barton Parkway east of the I-495 bridge; and two construction vehicle access locations to the American Legion Bridge. The linear impact north of Clara Barton Parkway would consist of tree removal, grading, and the installation of a stormwater management facility.

Both construction vehicle access locations are south of the parkway. One is approximately 1000 feet west of the I-495 bridge. The other is approximately 450 feet east of the bridge. These locations were coordinated with NPS. Having two construction access locations will shorten the duration of construction and provide safe movement of equipment and materials to and from the construction site. Impacts associated with the construction vehicle access consist of tree removal, land grading, and placing quarry spalls to support the movement of equipment and materials. Construction access would be required for the duration of construction of the new American Legion Bridge which is anticipated to last between four and five years.

In Virginia, the George Washington Memorial Parkway would be adversely affected by expansion of the American Legion Bridge within the park boundaries, causing increased visual and physical intrusion into the setting of the park, resulting in diminishment of setting and possibly landscape design and materials. In Maryland, the Clara Barton Memorial Parkway would experience temporary diminishment of setting and feeling for the duration of construction. Long-term construction access and staging is also required at

the parkway, which will cause additional temporary diminishment of setting and feeling for the duration of construction.

The park, in Virginia, contains archaeological historic properties, the proposed Dead Run Ridges archaeological district, and its contributing sites, that would also be adversely affected, and those are discussed separately in this section under “Archaeological Sites”.

D. Glenarden Historic District

Glenarden Historic District, eligible under criterion A, would be adversely affected. Activities at this location include widening I-495; replacing the Glenarden Parkway overpass; constructing, operating, and maintaining stormwater management facilities; and access for construction vehicles and materials. The LOD include:

- An area on a vacant lot at the northern end of the historic district east of the I-495 outer loop;
- A narrow linear area that extends 1600 feet along the eastern edge of the I-495 outer loop;
- A narrow linear area that extends approximately 3800 feet along the western edge of the I-495 inner loop;
- Narrow linear areas that extend approximately 1000 feet along the north and south sides of Glenarden Parkway; and
- A narrow linear area that extends approximately 400 feet along the east and west sides of 7th Street.

Although no dwellings would be physically affected, the LOD encompass significant portions of yards, including some outbuildings, of 24 dwellings that contribute to the district’s significance. These include the rear yards of 13 dwellings along the west side of 7th Street (1418, 1420, 1431, 1433, 1436, 1504, 1506, 1508, 1516, 1520, 1522, 1524, and 1526) and 4 on the east side of Reichter Street (8616, 8620, 8706, and 8708). Alterations tying a new bridge into existing streets are also proposed, and the LOD include portions of the front and rear yards of 4 contributing dwellings along Glenarden Parkway (8901, 8903, 8932, 9001) and 3 dwellings at 1501 4th Street, 1504 5th Street, and 1438 8th Street. Activities affecting contributing resources in the district consist of grading; tree removal; paving; removing and replacing an existing noise wall along I-495; constructing, operating, and maintaining stormwater management facilities; raising the height of the local roads to match the elevation of the new bridge carrying Glenarden Parkway across I-495; and access for construction vehicles and materials.

These actions would diminish the integrity of design, materials, and setting of the district and contributing properties. Construction of the new bridge within the district would also result in temporary diminishment of setting, feeling, and association of the district for the duration of construction.

E. Greenbelt Park

The NPS has made a preliminary determination of eligibility for Greenbelt Park under criteria A, C, and D, and the park would be adversely affected. Activities at this location include widening along I-495; the realignment of the ramp from eastbound Greenbelt Road to southbound Baltimore-Washington Parkway; augmentation and repair of an existing storm drain outfall; and access for construction vehicles and

materials. The LOD include three locations: a narrow strip approximately 1600 feet in length along the southern side of the ramp from eastbound Greenbelt Road to the southbound Baltimore-Washington Parkway; and two small rectangular areas south of the ramp from northbound Baltimore-Washington Parkway to the I-495 inner loop. Work within the park includes tree removal, grading, augmentation of storm drain outfall pipes, construction of a retaining wall, and access for construction equipment and materials. A portion of the perimeter trail may need to be relocated near the ramps from Greenbelt Road to the southbound Baltimore-Washington Parkway.

The park, significant for its recreational history, would experience some diminishment of setting, due to the visibility and proximity of an enlarged interchange at the Baltimore-Washington Parkway. The property may also experience some temporary diminishment of feeling during construction. The interchange is uniquely situated in comparison with other properties, in that Greenbelt Park has discontinuous portions bordering two quadrants of the interchange. Features within the park would not be physically affected.

F. Indian Spring Club Estates and Indian Spring Country Club

The Indian Spring Club Estates and Indian Spring Country Club, eligible under criteria A, B, and C, would be adversely affected. Activities at this location include widening I-495; relocating the on-ramp from northbound US 29 to the I-495 inner loop; and access for construction vehicles and materials. The LOD extend approximately 750 feet along the south side of the existing ramp and I-495. Work within the historic district consists of tree removal, grading, and realigning the ramp from northbound US 29 to the I-495 inner loop. These activities would displace indoor and outdoor swimming pools, including a wading pool, at the Silver Spring YMCA at 9800 Hastings Drive.

The main outdoor swimming pool, part of the original country club, is a contributing feature of the district. Demolition/removal of the swimming pool, and conversion of a portion of the property to highway use would diminish the integrity of design, materials, and workmanship of the property. Effects are confined to the original country club property, and the integrity of residences and other properties within the district would not be diminished.

G. Metropolitan Branch, B&O Railroad

The Metropolitan Branch of the B&O Railroad, eligible under criteria A and C, would be adversely affected. Activities at this location include realigning the railroad crossing to the west and replacing the existing bridge across I-495. The section of the railroad within the LOD consists of approximately 3500 linear feet of railroad, which extends approximately 1800 feet south of I-495 and 1700 feet north. Work within the historic boundary includes providing construction access for vehicles and materials, removing the existing rail and track bed, and constructing a new alignment. The railroad would be realigned in a manner that allows continued operation during construction of both I-495 and the active CSX railroad. The portion of the historic property that would experience an impact consists of the rails, rail prism, bridge across I-495, and Small Structure 15046X0, which contributes to the significance of the railroad. While the small structure would not be removed, it may be altered by extension to the west in a manner similar to when it was extended beneath Forest Glen Road in 1979. Alteration would result in a diminishment of integrity of design, materials, and workmanship of the property.

H. National Park Seminary Historic District/Forest Glen/Walter Reed Army Medical Center Annex

The National Park Seminary Historic District/Forest Glen/Walter Reed Army Medical Center Annex is listed in the NRHP, although the documentation does not specify under which eligibility criteria. The property would be adversely affected. Activities at this location include the replacement and realignment of two bridges across I-495: Linden Lane and the CSX railroad. The LOD are concentrated at two locations: the northwestern and northeastern corners of the historic property boundary. The bridge carrying Linden Lane would be constructed directly east of the existing alignment. Its length would be extended to accommodate the added width of the managed lanes on I-495. The Y-split of Linden Lane and Newcastle Avenue would also shift slightly into the boundary of the historic property. The realignment would result in the removal of trees and grading, as well as the construction, operation, and maintenance of the relocated Linden Lane and bridge over I-495 at the northwestern corner of the historic property.

The CSX railroad and bridge would be realigned to the west of the existing alignment. The realignment of the CSX railroad over I-495 to the west would result in the removal of trees and grading, as well as the construction, operation, and maintenance of the relocated CSX railroad and bridge at the northeastern corner of the property.

The landscape of the National Park Seminary Historic District is an element that contributes to its significance; because the LOD would expand into the existing landscape and convert a portion of the property to highway use, the project would diminish the integrity of design and setting of the historic district. The park also contains an additional archaeological resource within the LOD (18MO514) requiring additional investigation to determine eligibility for the NRHP (see Section 4).

I. Rock Creek Stream Valley Park, Units 2 and 3

The Rock Creek Stream Valley Park, Units 2 and 3, comprise a property eligible for the NRHP under Criterion A. The property would be adversely affected. Within the historic property, MDOT SHA has identified the need for a small, linear stormwater management facility east of the ramp from the outer loop of I-495 to northbound MD 355. This facility would require ground disturbance and the removal of trees from within this area of Unit 3 of Rock Creek Stream Valley Park. The repair and improvement, replacement, or augmentation of existing storm drain and stream conveyance pipes that traverse I-495 would require impacts to small, rectangular areas of the property, including ground disturbance and the removal of vegetation. At Unit 2, the LOD are concentrated along the I-495 outer loop, southwest of Jones Mill Road, consisting of the wooded area between the Rock Creek stream bank and I-495. Access to the Rock Creek Trail, which runs along the north side of I-495 through the corridor, would be maintained during construction with limited interruption.

A portion of the park would be converted to transportation use and/or associated stormwater management use, permanently diminishing integrity of design, materials, and setting of the property. Construction impacts may also temporarily diminish the integrity of setting and feeling of the property.

J. Sligo Creek Parkway

Sligo Creek Parkway is eligible under Criteria A and C and would be adversely affected. Activities include widening along I-495; augmenting an existing culvert beneath I-495, and the construction, operation, and maintenance of a stormwater management facility. The LOD are concentrated at three locations: a narrow area extending approximately 1400 linear feet along the I-495 outer loop; a narrow area extending approximately 2300 feet along the I-495 inner loop; and an oblong shape at the northeast corner of the Sligo Creek Golf Course. Work within the historic boundary includes tree removal; grading; bridge replacement; movement of construction vehicles and materials; and the construction, operation and maintenance of a stormwater management facility. The area of impact along the I-495 inner loop would require the relocation of two tee boxes parallel to their current distance from the hole in order to maintain play at the Sligo Creek Golf Course, a contributing resource within the parkway. A stormwater management facility on the golf course is necessary at this location owing to limited available space for the treatment of stormwater along this portion of I-495. Access to Sligo Creek Trail, another contributing resource, would be restricted during the bridge replacement at a construction laydown area on the north side of the outer loop and northwest of the trail.

A portion of the park would be converted to transportation use and/or associated stormwater management use, resulting in a minor loss of integrity of design, materials, and workmanship of a portion of the property. Construction impacts may also temporarily diminish the integrity of setting, feeling, and association of the property.

K. Archaeological Sites

a. C&O Canal Site 1 (18MO749)

Site 18MO749 is an Early Woodland archaeological site eligible under Criterion D. Because the site is within the LOD, the site would likely be partially or completely destroyed or significantly diminished in all aspects of integrity by construction of the project. NRHP eligibility of this site is pending SHPO concurrence.

b. C&O Canal Site 3 (18MO751)

Site 18MO751 is a historic period (circa 1828-1924) archaeological site eligible under Criteria A, C and D. Because the site is within the LOD, the site would likely be partially or completely destroyed or significantly diminished in all aspects of integrity by construction of the project. NRHP eligibility of this site is pending SHPO concurrence.

c. Dead Run Ridges Archaeological District

MDOT SHA evaluated a number of recorded precontact archaeological sites within the George Washington Memorial Parkway property in Virginia (Volume 6 of this report). MDOT SHA has determined that the majority of the investigated sites together constitute a NRHP-eligible archaeological district of related resources. Contributing sites or possible contributing sites within the proposed district boundary and inside the project LOD include 44FX0373, 44FX0374, 44FX0379, 44FX0381, and 44FX0389. Sites 44FX3160 and 44FX3900 were investigated and found neither individually eligible nor, in the case of 44FX3160, contributing to the district (44FX3900 is not part of the defined District). Because the district is partially within the LOD, portions of individual sites within the district would likely be destroyed, and

the district would likely be diminished in all aspects of integrity by construction of the project. NRHP eligibility of the Dead Run Ridges Archaeological District is pending SHPO concurrence.

As described in Volume 4, several areas within the APE require additional investigation to determine the presence of archaeological sites and/or NRHP eligibility of sites. If eligible sites are identified through these efforts, and adverse effects cannot be avoided, the PA will identify a process to minimize and/or mitigate adverse effects.

3.1.2 Properties Where Effects Cannot be Fully Determined

Based on current design information, effects cannot be fully determined on seven historic properties (Table 3-2). MDOT SHA would treat these historic properties under the PA for the Study to evaluate effects, and continue to avoid, minimize, or mitigate adverse effects, as design advances. The properties are discussed individually below.

Table 3-2: Historic Properties Where Effects Cannot Be Fully Determined

MIHP#/DHR#	Name	Period of Significance	NRHP Criteria
M: 31-7	Capitol View Park Historic District	1887-1941	A, C
M: 29-59	Carderock Springs Historic District	1962-1967	A, C
PG:73-36	Carsondale	1955-1962	A
M: 29-39	Gibson Grove A.M.E. Zion Church	1923	A
M: 32-5	Polychrome Historic District	1934-1935	A, C
PG:76A-22	Suitland Parkway	1942-1944	A, C
M: 29-49	Washington Aqueduct (NHL)	1853-1939	A, C

A. Capitol View Park Historic District

Capitol View Park Historic District is eligible for the NRHP under Criteria A and C. To accommodate the realignment of the Metropolitan Branch, Baltimore and Ohio Railroad, the LOD are concentrated along the west side of Capitol View Avenue, east of the railroad. Activities within the Capitol View Park Historic District would consist of tree removal, grading, and access for construction vehicles and materials to realign the railroad further west. The LOD include a noncontributing parking lot and retaining wall at 9710 Capitol View Avenue; the building itself is a contributing resource. South of the district, Linden Lane may be realigned as a result of the new Metropolitan Branch alignment. Although contributing elements are outside the LOD, the LOD are in close proximity to contributing stone walls surrounding the parking lot

for the Castle of Forest Glen at 10 Post Office Road. Impacts to these walls may diminish the integrity of the property's design, materials, workmanship, and setting. MDOT SHA proposes to include measures to avoid adverse effects in the PA, and if avoidance is not possible, a process to identify minimization and/or mitigation measures will be followed. Note that right-of-way is uncertain in this area, and mapping may show minor discrepancies between the parcel boundary and MDOT SHA's current right-of-way understanding, which will be resolved as the project moves forward.

B. Carderock Springs Historic District

Carderock Springs Historic District is eligible for the NRHP under Criteria A and C. The LOD avoids immediate physical impacts to contributing properties but may result in loss of tree and landscape buffer that could create a diminishment of the design and setting of contributing elements of the district. MDOT SHA proposes to include measures to avoid adverse effects in the PA, and if avoidance is not possible, a process to identify minimization and/or mitigation measures will be followed.

C. Carsondale

Carsondale is eligible for the NRHP under Criterion A. To accommodate widening along US 50 associated with realigning the US 50/I-495 interchange and replacement of the bridge carrying Whitfield Chapel Road over US 50, the LOD in Carsondale include: a narrow linear area that extends approximately 550 feet where the northern edge of the historic district meets US 50; and a narrow strip that extends 150 along the east side of Whitfield Chapel Road. Activities within Carsondale would consist of tree removal, grading, construction of a retaining wall, and access for construction vehicles and materials. Along Whitfield Chapel Road, the roadway height would be adjusted to meet the elevation of the new bridge across US 50. There are no physical impacts to contributing dwellings, but the LOD encompass minor portions of front or rear yards, including some secondary structures, of nine dwellings that contribute to the district's significance. These include the rear yards of seven dwellings along the north side of Wallace Road (9004, 9010, 9016, 9018, 9104, 9112, 9114) and the front yards of two dwellings on Whitfield Chapel Road (4907 and 4909). Dependent on design and construction needs, there may be diminishment of design and setting to contributing elements of the district. MDOT SHA proposes to include measures to avoid adverse effects in the PA, and if avoidance is not possible, a process to identify minimization and/or mitigation measures will be followed.

D. Gibson Grove A.M.E. Zion Church

Gibson Grove A.M.E. Zion Church is eligible for the NRHP under Criterion A. The LOD at this location represent above-grade impacts, and no physical impacts to the historic property are anticipated. The south side of the parcel is within the LOD, but the church itself occupies the north side of the parcel, across a small gully. The nearby segment of I-495 forms an overpass crossing Seven Locks Road southeast of the church. The LOD at the overpass extends along Seven Locks Road in front of the church; dependent on design and construction needs, there may be diminishment of the property's setting. Long-term construction access and staging may cause additional temporary diminishment of setting and feeling for the duration of construction. MDOT SHA proposes to include measures to avoid adverse effects in the PA, and if avoidance is not possible, a process to identify minimization and/or mitigation measures will be followed.

E. Polychrome Historic District

The Polychrome Historic District is eligible for the NRHP under Criteria A and C. While the LOD avoids immediate physical impacts to contributing properties, dependent on design and construction needs, there may be diminishment of design, materials, workmanship, and setting resulting from impacts to retaining walls along Colesville Road, or from other project elements. MDOT SHA proposes to include measures to avoid adverse effects in the PA, and if avoidance is not possible, a process to identify minimization and/or mitigation measures will be followed.

F. Suitland Parkway

Suitland Parkway is eligible for the NRHP under Criteria A and C. To accommodate widening I-495 at the bridges over Suitland Parkway and to provide access for construction vehicles and materials, small stormwater management facilities would be placed in vaults beneath the shoulders. The facilities are required to address a deficit in stormwater quantity treatment in this portion of the Build Alternatives. The LOD are concentrated in small irregularly shaped areas at the northwest and northeast quadrants of where I-495 passes over Suitland Parkway. Activities within Suitland Parkway would consist of grading, tree removal, landscape plantings; and access for construction vehicles and materials. The project will cross over the Parkway at the location of bridges currently undergoing replacement and is not expected to alter the character of the property; however, right of way needs and construction impacts are not fully determined; if contributing features are transferred out of federal control, an adverse effect may result. MDOT SHA proposes to include measures to avoid adverse effects in the PA, and if avoidance is not possible, a process to identify minimization and/or mitigation measures will be followed.

G. Washington Aqueduct

The Washington Aqueduct is eligible for the NRHP under Criteria A and C. The LOD at this location represent above-grade impacts, and no physical impacts to the historic property are anticipated. The project will cross an underground segment of the aqueduct at MacArthur Boulevard. Current project engineering is not expected to alter the character of the property, and ground disturbance will be limited to avoid effects to the aqueduct; however, construction impacts are not fully determined. MDOT SHA proposes to include measures to avoid adverse effects in the PA, such as restrictions on ground disturbance within this portion of the LOD, and if avoidance is not possible, a process to identify minimization and/or mitigation measures will be followed.

3.1.3 Properties Experiencing No Adverse Effect

Of the remaining 34 eligible or listed properties within the APE, none would be adversely affected by the project. These properties would either experience slight alteration of the characteristics that qualify them for inclusion in the NRHP, but there would be no diminishment of these characteristics, or there would be no appreciable alteration of the properties at all.

As context, the study corridor already includes substantial and congested highway facilities within the viewshed and audible setting of most properties. As such, increasing capacity and flow of the existing Beltway *in and of itself* would not generally result in substantive new audible, visual, or other adverse effects to the setting, feeling and association of these properties, because the existing setting already includes the I-495 and I-270 facilities. While the setting would be somewhat altered by the addition of

new lanes, these are not newly introduced visual, atmospheric or audible elements that would diminish the integrity of significant historic features of nearby properties. Adverse effects are generally found, as above, when there are specific contributing features of historic properties either within or in close proximity to the project LOD that would be physically impacted in a manner beyond the general increase in capacity of the highway facilities.

The properties experiencing no adverse effects fall into three general groupings.

1. Properties where there is a minor portion of the historic property boundary within the LOD, but there are generally no contributing elements of the property within the LOD. No diminishment of location, design, materials, association and workmanship would occur, and setting and feeling would be consistent with the existing highway facility.
2. Properties with no portion of the historic property boundary within the LOD but are adjacent to the LOD. No physical impacts would occur, and although some change may be perceptible, no visual, atmospheric, or audible elements that are substantially different from those that already exist, would be introduced. These properties are, or would be, screened by noise barriers and/or trees and vegetation.
3. Properties further removed from the LOD, that would experience no notable changes resulting from the proposed improvements.

Because individual discussion of these properties would be largely redundant, they grouped in Table 3-3, Table 3-4, and **Table 3-5** with any relevant property-specific information informing the effect determination captured as a note in the appropriate column.

Table 3-3: Category 1: Properties with Minor Elements within LOD

MIHP#	Name	Period of Significance	NRHP Criteria	Notes
M: 30-38	Academy Woods	1967-1974	C	The LOD include minor portions of rear yards at 7221, 7224, and 7225 Grubby Thicket Way. Rear yards are adjacent to the existing highway, and the greatest area of impact, at 7224 Grubby Thicket Way, occurs at a wooded corner of the parcel, far removed from the house.
PG:LAU-29	Baltimore & Ohio Railroad, Washington Branch	1835-1945	A, C	The railroad crosses the LOD, and the Greenbelt Station Road ramp over the railroad will be moved and widened; temporary construction impacts will be present within the property boundary, but no changes will occur to the railroad itself.
PG:71A-54	Baltimore & Potomac Railroad, Washington City Branch	1872-1945	A, C	The undertaking would potentially relocate two electric catenaries*, but there are numerous catenaries along the railroad corridor; therefore, the undertaking would not diminish integrity of location, design, materials, and workmanship.
PG:62-14	Beltsville Agricultural Research Center (BARC)	Unspecified	A, C	The LOD include small wooded areas along the highway designated for tree removal, grading,

MIHP#	Name	Period of Significance	NRHP Criteria	Notes
				and construction access; no contributing agricultural fields, buildings, or structures are within the LOD.
M: 35-121	Burning Tree Club	1922-1923	A, C	The LOD include a portion of wooded areas along the highway near the contributing golf course, but no impacts to the course itself.
M: 36-37	Calvary Evangelical Lutheran Church	1948, ca. 1950, ca. 1965	C	The LOD adjoin a parking lot along Georgia Avenue and include a sliver of the curved drive along the I-495 on-ramp; neither contribute to the property's significance.
M: 31-8	Forest Glen Historic District	1891-early 20th century	A, C	The LOD include portions of the large rear yards of contributing properties at 2418 and 2420 Forest Glen Road to accommodate grading, removal of trees planted after 1982, and replacement of the existing noise wall. The house at 2400 Forest Glen Road is noncontributing.
PG:67-4	Greenbelt Historic District (NHL)	1935-1941	Unspecified	See discussion in Section 3.1.4.
M: 35-120	Locust Hill Estates	1941-1949	A, C	LOD impacts are limited to noncontributing houses outside the district's period of significance.
PG:67-41	Maryland State Highway Administration (MDOT SHA) District 3 Headquarters Building	1967	C	The LOD include a small portion of the property's south corner near Kenilworth Avenue. This area is south of the property's fence line and screened by trees. Note that right-of-way is uncertain in this area, and mapping may show minor discrepancies between the parcel boundary and MDOT SHA's current right-of-way understanding, which will be resolved as the project moves forward.
PG:76A-39	Morningside	ca.1940-ca.1955	A, C	The LOD include a minor portion of the rear yard of 6928 Pickett Drive, along a chain-link fence separating the parcel from a raised segment of highway to the south. The Morningside boundary as mapped by MHT does not accurately reflect the property boundary. MDOT SHA has notified MHT of the mapping error, and an accurate boundary is shown in the appendices for Volume 3. Note that right-of-way is uncertain in this area, and mapping may show minor discrepancies between the parcel boundary and MDOT SHA's current right-of-way understanding, which will be resolved as the project moves forward.
PG:72-76	New Carrollton Metrorail Station and Yard	1978-1983	A, C	LOD impacts are limited to the northeast corner of the historic property, within a fenced grassy area. Contributing resources are well removed from the LOD. Note that right-of-way is uncertain in this area, and mapping may show minor discrepancies between the parcel boundary and MDOT SHA's current right-of-way understanding, which will be resolved as the project moves forward.

MIHP#	Name	Period of Significance	NRHP Criteria	Notes
M: 26-72-1	Ward Building	1978	C	The LOD include a grass berm at the edge of a parking lot along I-270, west of the building, which does not contribute to the significance of the property.
M: 30-15	Wild Acres (Grosvenor Estate)	1928-1966	A, B, C	The LOD extend west of an existing noise wall along the east side of the property, adjoining newly constructed townhouses and a forested area east of the contributing cottage at 5420 Grosvenor Lane. The cottage faces away from the noise wall and will retain a majority of the surrounding trees.
M: 26-71	Woodley Gardens	1960-1970	A, C	The LOD at the northwest corner of the property include a noncontributing trail and grassy area.

*Catenaries contribute to the significance of the Baltimore & Potomac Railroad, Washington City Branch

Table 3-4: Category 2: Adjacent to LOD, but no audible, atmospheric, or visual impacts to contributing features

MIHP#	Name	Period of Significance	NRHP Criteria	Notes
PG:70-95	Capitol Car Distributors	1965	C	The historic property boundary is adjacent to the LOD, but the building and designed landscape are outside APE.
M: 35-194	Carderock Springs South	1966-1971	C	The historic property boundary is adjacent to the LOD at Persimmon Tree Road, but the houses, designed landscapes, and entrance sign are outside the LOD.
M: 29-79	Congressional Country Club	1924-1978	A, C	The contributing 1978 golf course is across Eggert Drive from the LOD, but the buildings are substantially removed from the LOD
M: 35-38	In the Woods (David Fairchild Estate)	1906-1926	B, C	The LOD abut the historic property boundary; however, an existing noise wall screens the property from I-495
PG:72-3	Street Railway Service Building	Unspecified	A, C	The historic property boundary is adjacent to the LOD, but the property's significance is confined to the building itself, which will experience no impacts.

Table 3-5: Category 3: Substantially removed from LOD, No noticeable effects anticipated

MIHP#	Name	Period of Significance	NRHP Criteria
M: 31-72	Cedar Lane Unitarian Church	1958-1963	C
M: 31-8-5	Charles E. Brock Property	1908	C
M: 29-47	David W. Taylor Model Basin	1938-1970	A, C
M: 31-26	Greater Washington Boy's and Girl's Club, Silver Spring Branch (Harry F. Duncan Building)	ca. 1950	A, C

MIHP#	Name	Period of Significance	NRHP Criteria
PG:67-36	Greenbelt Maryland National Guard Armory	1955	C
M: 30-39	Grosvenor Park	1963-1966	A, C
M: 35-199	Hawley Estate (Federation of American Societies for Experimental Biology)	1929-1954	C
PG:78-39	Little Washington	1938-1969	A
M: 20-47	National Institute of Standards and Technology (NIST) Headquarters	1963-1969	A, C
M: 29-52	Naval Surface Warfare Center Carderock Division (NSWCCD) Historic District	1938-1958	A, C
PG:75A-35	Percy Benson Sansbury Property	ca. 1930	C
M: 35-162	Philip F. Gormley House/Gagarin Property	ca. 1912	C
M: 33-31	Washington Coca-Cola Bottling Plant (Silver Spring)	1969	C
M: 31-71	Washington, D.C. Temple (Church of Jesus Christ Latter-day Saints)	1971-1979	A, C

A. Archaeological Resources – No Adverse Effect

As noted in Section 3.1.1, MDOT SHA finds three archaeological properties are adversely affected: 18MO749 (C&O Canal Site 1), 18MO751 (C&O Canal Site 3), and the Dead Run Ridges Archaeological District in Virginia.

The Gap Analysis (**Volume 2, Table 3**) described multiple other previously recorded sites within the APE. The only site determined eligible for the NRHP within the APE was the Indian Creek V site, 18PR94. This site was previously mitigated and largely destroyed by the construction of a Washington Metropolitan Area Transit Authority facility. The Study will have no adverse effect to 18PR94. In Virginia there are eight sites outside of the LOD and not within the proposed Dead Run Ridges Archaeological District (44FX0214, 44FX0325, 44FX0346, 44FX0347, 44FX0348, 44FX3389, 44FX3795, and 44FX3816). Sites outside the LOD will experience no effect from the project.

No other known, eligible sites are within the LOD or APE, therefore there are no other archaeological sites that would be affected. However, as discussed in Chapter 4, several sites require additional evaluation, and the PA would describe these requirements, likely via an archaeological treatment plan. The PA would also include provisions for determining eligibility and effects findings in the event of an inadvertent archaeological discovery during construction.

3.1.4 National Historic Landmarks in the APE

Greenbelt Historic District

Activities near the Greenbelt Historic District involve augmenting existing drainage outfalls; realigning the interchange of Baltimore-Washington Parkway with Southway and Greenbelt Road; and construction, operation, and future maintenance of stormwater management facilities. The LOD within the historic district include: a rectangular area adjacent to the inner loop and outer loop at the southeastern end of the interchange with Kenilworth Ave; and two small areas north and east of the exit from MD 295 south to Southway. Work at these areas would include of tree removal, grading, installation of a stormwater augmentation pipe, and access for construction vehicles and materials.

The LOD include a small part of the discontinuous portion of the district containing the Walker Cemetery and Indian Springs, where anticipated work consists of a trenching pit related to the installation of the stormwater augmentation pipe beneath I-495; however, no features of the cemetery or springs are within the LOD. At the north side of the MD 295 interchange, the LOD extend to an existing fence line south of 7-9-11 Southway, a contributing apartment building. The impacts to 7-9-11 Southway are related to the reconfiguration of the I-495 interchange with the Baltimore-Washington Parkway, including replacing the bridge carrying Greenbelt Road over Baltimore-Washington Parkway to accommodate the ramp from southbound MD 295 to the I-495 outer loop. This alteration requires a minor realignment of the partial interchange between the Baltimore-Washington Parkway and Southway/Greenbelt Road. The LOD at this location are south of a parking lot in a vine-covered wooded area removed from the building. Elsewhere, the LOD include minor portions of Greenbelt Lake Park (now Buddy Attick Lake Park) on the northeast side of the beltway adjoining an existing utility line. These wooded areas are at existing drainage outfalls and would not affect recreational facilities associated with the park. As a result, the property would not be adversely affected, because no diminishment of location, design, materials, association or workmanship would occur to contributing features, and setting and feeling would be consistent with the existing highway facility.

The Washington Aqueduct

The Washington Aqueduct is eligible for the NRHP under Criteria A and C. The LOD at this location represent above-grade impacts, and no physical impacts to the historic property are anticipated. The project will cross an underground segment of the aqueduct at MacArthur Boulevard. Current project engineering is not expected to alter the character of the property, and the project would limit ground disturbance through a commitment in the PA to avoid effects to the aqueduct. As noted in Section 3.1.2., because avoidance will require this specific commitment, MDOT SHA has noted the Washington Aqueduct as a property where effects cannot be fully determined at this time. If for unforeseen reasons, avoidance is not possible, a process to identify minimization and/or mitigation measures in the PA will be followed.

Pursuant to the requirements of 36 CFR Part 800.10(c), FHWA will notify the Department of Interior that the consultation involves National Historic Landmarks and will invite participation in consultation.

3.1.5 Indirect and Cumulative Effects

36 CFR 800.5(1) notes that adverse effects “may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.”

The build alternatives, responding to an identified need for additional capacity, may be one factor in increased demand for residential or commercial development due to improved travel access along the study corridors – particularly in areas with undeveloped land such as northern Montgomery County and in the Frederick vicinity. Potential indirect effects could occur to historic properties resulting from increased population growth and development in the APE. However, these areas are subject to many greater economic and demographic pressures producing increased population and development that are not caused by the Study.

Past actions that have impacted historic properties include the numerous infrastructure and land development activities that have occurred in the APE. The APE has experienced substantial growth of population, housing, and employment since the mid twentieth century. This has resulted in destruction or degradation of historic properties, including demolition for new construction and/or changes in land use. Present and future actions, including transportation projects and land development activity, would likely continue to impact cultural resources in similar ways. For transportation projects, however, existing protective regulations and consultation requirements associated with Section 106 and Section 4(f) resources would minimize and mitigate for such effects, reducing the overall net effect to historic properties. Potential future impacts to cultural resources from non-transportation projects would also be subject to applicable federal, state, and local planning ordinances that protect many of these resources.

There are no planned developments within the APE that are dependent on completion of the build alternatives. The Study is responding to other large-scale pressures resulting in increased population and development that result in depleted capacity and congestion on I-495 and I-270; it is not the cause of generalized degradation of historic properties in the APE due to development. As a result, there are no indirect or cumulative adverse effects to historic properties specifically caused by the undertaking.

4

4 NEXT STEPS

Additional Archaeological Investigations: Ten survey areas identified during the Gap Analysis were not accessible during the Phase I archaeological investigation. A re-evaluation of the remaining survey areas was undertaken in light of information obtained from survey of adjacent areas, and five survey areas were determined to be either disturbed or otherwise retain no potential for intact archaeological resources. Supplemental Phase I archaeological investigations will be completed at the remaining five locations either when access is obtained or under the PA. Additional intensive archaeological investigations have been conducted on archaeological resources in Virginia, within the George Washington Memorial Parkway. The results of these investigations are included as Volume 6 of this technical report.

Seven identified archaeological sites are within the LOD that require additional evaluation to determine eligibility for the NRHP (Table 4-1). Sites 18MO752 (Cabin John Site 1), 18MO514 (Forest Glen), 18MO191 (Kavanagh XII), the possible location of Moses Hall, 18MO190 (Kavanagh XI), 18MO457 (Booze Creek) and 18MO510 are discussed in Volume 4. MDOT SHA would include commitments in the PA for phased evaluation of these sites, and provisions for avoidance, minimization, or mitigation of adverse effects should any of the resources be determined NRHP-eligible.

Table 4-1: Archaeological Resources Recommended for Additional Testing

Site Number	Name	Time Period	Comment
18MO190	Kavanagh XI	Historic (unknown)	Additional evaluation to be proposed under Programmatic Agreement
18MO191	Kavanagh XII	19 th -20 th Century Farmstead	Additional evaluation to be proposed under Programmatic Agreement
18MO457	Booze Creek	Precontact Camp	Additional evaluation to be proposed under Programmatic Agreement
18MO510	Rock Creek Hills #1	Precontact Lithic Scatter	Additional evaluation to be proposed under Programmatic Agreement

Site Number	Name	Time Period	Comment
18MO514	Forest Glen (at National Park Seminary)	Historic	Additional evaluation to be proposed under Programmatic Agreement
18MO752	Cabin John Site 1	Precontact (unknown)	Additional evaluation to be proposed under Programmatic Agreement
No Site Number	Moses Hall	19 th -20 th Century Lodge	Additional evaluation to be proposed under Programmatic Agreement

Volume 4 additionally describes and recommends additional evaluation for documented historic cemeteries within or adjacent to the LOD. The two cemeteries within the LOD, the Moses Lodge Cemetery and the Montgomery County Poor Farm Cemetery would be subject to additional evaluation and treatment under the PA. Should these cemeteries be located, found to have integrity, and also meet the criteria for the NRHP, MDOT SHA would make eligibility determinations after such investigations. Whether determined to be historic properties or not, MDOT SHA would first endeavor to avoid disturbance of human remains and remove and relocate any remains as a less preferred option. The remainder of the historic cemeteries would be subject to provisions of the PA should the LOD change to potentially impact their documented locations.

Volume 4 also describes multiple sites identified during this study (18MO750, 18MO753, 18MO754, 18MO755, 18MO756, 18PR425, and 18PR1131) that have been determined not eligible and no further investigation is recommended, pending SHPO concurrence with the eligibility determination. The two previously known archaeological sites (18MO22 and 18PR1133) are also determined not eligible and would require no further investigation pending SHPO concurrence with the eligibility determination.

Several other sites are within the APE, but outside the LOD, and are either unevaluated, or have been recommended not eligible for the NRHP, but lack a formal agency determination and concurrence on record (**Table 4-2**). Because no effects are anticipated to these resources, being outside the limits where ground disturbance may occur MDOT SHA has not made formal NRHP eligibility determinations. MDOT SHA would include provisions in the project PA to evaluate and treat these sites Should the LOD change in a way that would affect them. Several other unverified resources denoted in MHT's Quad files are reported within the APE and would be investigated as appropriate.

Table 4-2: Archaeological Resources within APE but outside LOD

Site Number	Name	Time Period
18MO63	Walter Johnson	Precontact Camp
18MO64	Backyard	Precontact Lithic Scatter
18MO65	Marywood	Precontact Camp
18MO332	Rock Creek Stream Valley	Precontact Lithic Scatter
18MO556	Site 2	Precontact Lithic Scatter

Site Number	Name	Time Period
18MO602	Fuster	Precontact Lithic Scatter
18PR87	Cherry Hill	Precontact (unknown)
18PR401	KCI-90-3	Precontact Camp
18PR402	KCI-90-4	18 th – 19 th Century House
18PR801	Toaping Castle	18 th – 20 th Century Plantation
18PR836	Woodmore #1	19 th – 20 th Century Farmstead
18PR861	Mount Calvary Baptist Church	19 th -20 th Century Church
44FX0214	unnamed	Precontact (unknown) --GWMP
44FX0325	Turkey Run Bridge	Precontact (unknown) --GWMP
44FX0346	unnamed	Precontact (unknown) --GWMP
44FX0347	unnamed	Precontact (unknown) --GWMP
44FX0348	unnamed	Precontact (unknown) --GWMP
44FX3389	Outfall #123	Woodland --GWMP
44FX3795	unnamed	Precontact (unknown) --GWMP
44FX3816	Little Toe Site	Precontact (unknown) --GWMP

Programmatic Agreement: Due to the complexity of the undertaking, the current state of design, and its uncertain effects to historic properties, MDOT SHA expects Section 106 review to be completed through the execution of a PA, documenting the assessment and resolution of effects to known historic properties and providing protocols for additional consultation, evaluations, and resolution of effects following advancement of design.

Additionally, it is known the Study will have mitigation development needs for stream, wetland, and other environmental impacts. A preliminary list of sites under consideration has been identified in the Draft EIS, **Appendix K**. MDOT SHA will include procedures to evaluate and assess effects to cultural resources for these sites and other expansions or revisions to the APE in the PA.

MDOT SHA has communicated the intent to complete Section 106 review via a PA to consulting parties since the inception of the PA. MDOT SHA shared a conceptual outline of the PA with consulting parties on June 17, 2019 (**Appendix C of Volume 1**). FHWA has notified ACHP of the proposed PA and ACHP has elected to participate in consultation, which will continue.

MDOT SHA will oversee implementation of the stipulations of the PA as the program continues into design and construction.

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Appendix A

ACHP and Consulting Parties Correspondence

- ACHP
- MHT and DHR
- Tribes
- Additional Consulting Parties

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DRAFT

ACHP



U.S. Department
of Transportation
**Federal Highway
Administration**

Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

March 26, 2018

In Reply Refer To:
HDA-MD

Mr. John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington DC 20001-2637

Dear Mr. Fowler:

The Federal Highway Administration (FHWA), in coordination with the Maryland Department of Transportation State Highway Administration (MDOT SHA), is preparing an Environmental Impact Statement (EIS) for the I-495 & I-270 Managed Lanes Study in accordance with the National Environmental Policy Act (NEPA). FHWA published a Notice of Intent to prepare the EIS in the Federal Register on March 16, 2018. The purpose of the I-495 & I-270 Managed Lanes Study is to accommodate existing traffic and long-term traffic growth, enhance trip reliability, and improve travel choice. The study will result in an EIS which will include: scoping, purpose and need development, corridor alternative analysis and screening, traffic and environmental analyses, and public and agency involvement. The study limits encompass approximately 55 miles on I-495 (Capital Beltway), from south of the American Legion Bridge in Virginia to east of the Woodrow Wilson Bridge and on I-270 (Dwight D. Eisenhower Memorial Highway) from I-495 to I-370, including the east and west I-270 spurs in Montgomery and Prince George's Counties, Maryland. The study will include a review of existing and future traffic, roadway, and environmental conditions to identify alternatives and assess potential impacts. The attached figure (**Attachment A**) depicts the extent of the study area.

Your agency has been identified as one that may have jurisdiction by law and an interest in this project; accordingly, FHWA and MDOT SHA invite your agency to become a participating agency in the environmental review process and preparation of the Draft EIS and Final EIS for the subject project in accordance with 40 CFR 1501.6. Pursuant to 23 U.S.C. § 139, participating agencies are responsible to identify issues of concern that could substantially delay or prevent an agency from granting a permit or other approval that is needed for a project.

As a participating agency, your agency would have the following responsibilities related to its jurisdiction:

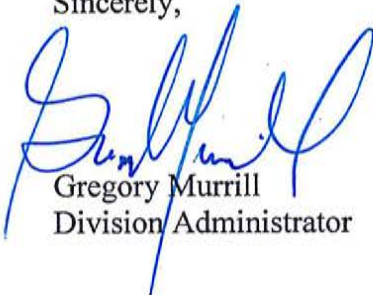
1. Identify, as early as practicable, any issues of concern regarding potential impacts on the natural or human environment.

2. Provide meaningful and early input on relevant issues such as the study purpose and need, the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
3. Participate in coordination meetings and field reviews with other environmental resource agencies as appropriate.
4. Adhere to timeframes for reviewing and commenting on administrative copies of environmental documentation, including the Draft and Final EIS.

If you are not the point of contact, please provide the appropriate contact information. Your agency may elect to accept or decline the invitation by checking the appropriate box and signing the attached agency response form (Attachment B). If your agency elects to decline this invitation, please include the reason for declining with your agency's response to the lead federal agency. The response may be transmitted electronically to the Environmental Program Manager, Ms. Jeanette Mar, at jeanette.mar@dot.gov.

Thank you in advance for your consideration, we look forward to receiving your response to our invitation to serve as a participating agency. Please respond to this invitation no later than **April 26, 2018**. If you have any questions or need additional information, please contact Ms. Mar via email at jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachments:

- A: Study Area Map
- B: Agency Response Form

cc: Ms. Caryn J. G. Brookman, MDOT SHA, P3 Environmental Manager
Ms. Lisa B. Choplin, DBIA, MDOT SHA, P3 Director
Mr. Jeff Folden, P.E, DBIA, MDOT SHA P3 Deputy Director
Ms. Sarah Stokely, ACHP, Program Analyst

Milford Wayne Donaldson, FAIA
Chairman

Leonard A. Forsman
Vice Chairman

John M. Fowler
Executive Director



Preserving America's Heritage

May 22, 2018

Ms. Brandye Hendrickson
Acting Administrator
Federal Highway Administration
1200 New Jersey Ave S.E.
Washington, D.C. 20590

Ref: *Environmental Impact Statement for the I-495 & I-270 Managed Lanes Study
Montgomery and Prince Georges County, Maryland
ACHPConnect Log Number: 12723*

Dear Ms. Hendrickson:

In response to a recent notification by the Federal Highway Administration (FHWA), in coordination with the Maryland Department of Transportation State Highway Administration (MDOT SHA), the Advisory Council on Historic Preservation (ACHP) will participate in consultation regarding the Section 106 review for the I-495 & I-270 Managed Lanes Study in Maryland. The ACHP understands that FHWA will finalize a Programmatic Agreement with the consulting parties once a preferred alternative is selected. Our decision to participate in this consultation is based on the *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, contained within the regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act. The criteria are met for this proposed undertaking because the project could have substantial impacts on important historic properties, and has the potential for presenting procedural problems.

Section 800.6(a)(1)(iii) of our regulations requires that we notify you, as the head of the agency, of our decision to participate in consultation. By copy of this letter, we are also notifying Mr. Gregory Murrill, FHWA Maryland Division Administrator, and Ms. Jeanette Mar, FHWA Maryland Division Environmental Program Manager.

Our participation in this consultation will be handled by Sarah Stokely who can be reached at 202-517-0224 or via e-mail at sstokely@achp.gov. We look forward to working with your agency and other consulting parties to consider alternatives to this undertaking that could avoid, minimize, or mitigate potential adverse effects on historic properties and to reach a resolution.

Sincerely,

John M. Fowler
Executive Director

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 • Washington, DC 20001-2637
Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

MHT and DHR

April 12, 2018

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

Introduction and Study Description

This letter serves to inform the Maryland Historical Trust (MHT) of the Maryland Department of Transportation State Highway Administration's (MDOT SHA) proposed Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The study is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland. The study limits of the initial phase, the I-495 & I-270 MLS, encompass I-495 from south of the American Legion Bridge in Fairfax County, Virginia, to east of the Woodrow Wilson Bridge and I-270 from I-495 north to I-370, including the east and west I-270 spurs along I-495. The preliminary purpose of the MLS is to accommodate existing traffic and long-term traffic growth, enhance trip reliability, and improve travel choice on I-495 and I-270, within the study limits.

As a P3 study, design and construction will be undertaken by private sector concessionaires, who will also be responsible for the ongoing operation of the improvements. Due to the nature of the P3 study delivery structure, the precise nature of the improvements will not be determined until the concessionaires have been selected and develop a solution that meets the goals of the study.

Due to the complexity of the undertaking and the design flexibility allowed by the P3 delivery method, MDOT SHA expects Section 106 review to be completed through execution of a Programmatic Agreement documenting assessment and resolution of effects to known properties and providing protocols for evaluation and resolution of effects following advancement of design. MDOT SHA will ask FHWA to notify the Advisory Council on Historic Preservation and invite their participation in the proposed Agreement.

Preliminary Area of Potential Effects

In developing a preliminary Area of Potential Effects (APE) for this study, MDOT SHA considered possible visual, audible, atmospheric and/or physical effects to historic properties,

both archaeological sites and standing structures, that would diminish the integrity of any characteristics that would qualify a property for the National Register of Historic Places (NRHP).

Because the precise limits of disturbance are unknown, MDOT SHA has developed a Corridor Study Boundary (CSB), the envelope within which improvements may occur. The CSB is defined as a line extending 300 feet from the centerline on either side of I-495 and I-270 within the study limits, as shown in Attachment 1. MDOT SHA makes the assumption at this point that the CSB represents the area where direct effects to historic properties, including archaeological resources, may occur.

To capture anticipated direct and indirect effects, the preliminary APE encompasses the CSB and extends an additional 250 feet on either side, expanding farther at certain interchanges. The CSB and APE are preliminary and subject to change as more information about the I-495 & I-270 MLS study becomes available.

Funding

Federal funds are anticipated for this study.

Identification Methods and Results

Potentially significant architectural and archaeological resources will be researched as part of the historic investigation instigated by the proposed I-495 & I-270 MLS.

Architecture: The study area is located along I-495 from south of the Potomac River to I-270 in Montgomery County, and along I-270 between its confluence with I-495 to I-370 South of Gaithersburg. Within the study limits, I-495 and I-270 are multilane divided highway that form multiple large interchanges with Maryland highways. The surrounding areas include a range of residential, commercial, and office and industrial buildings constructed from the early twentieth century up to the present. Residential dwellings include single-family houses, multi-family apartments, and townhouse communities. Commercial properties are primarily auto-oriented shopping centers, and office and industrial uses are present individually and concentrated in single-use developments. The majority of buildings are single-family houses within residential subdivisions developed between 1950 and 1980.

North, east, and south of Washington, D.C., I-495 mainly passes through and between preexisting suburban neighborhoods constructed following World War II and those built concurrently with the highway into the 1960s. Later development appears primarily in Montgomery County along the western section of the Beltway and along the I-270 corridor.

A preliminary review of MHT's Medusa database, the Maryland Inventory of Historic Properties (MIHP), the Virginia Department of Historic Resources' V-CRIS database, and property tax data has identified 35 NRHP listed or eligible properties within the APE. The APE also includes 18

properties that are listed in the MIHP but have not been evaluated for NRHP eligibility. One eligible property within the APE, the WMAL Transmittal Property (M: 30-24), was demolished in 2017. A list of eligible and unevaluated resources within the APE is provided as Attachment 2.

In addition, under Section 106 of the National Historic Preservation Act of 1966, buildings that are 50 years of age qualify to be considered for inclusion in the National Register of Historic Places (NRHP). In consideration of the study schedule, MDOT SHA intends to evaluate resources within the APE that were constructed in or prior to 1978 for NRHP eligibility to account for resources that may become eligible during the course of construction.

MDOT SHA will develop an addendum to the existing *Suburbanization Historic Context and Survey Methodology* (KCI Technologies, Inc., 2000) which covers suburban development in Montgomery and Prince George's counties up to 1960, to provide guidance for evaluating resources constructed after 1960.

As the study develops and details regarding the study limits and CSB are finalized, MDOT SHA will revise the APE accordingly and determine the extent of affected properties. MDOT SHA looks forward to coordinating with MHT and other consulting parties on this study.

Archaeology: The archaeology survey area is defined as the CSB, and is subject to change. MDOT SHA prepared a preliminary archaeological assessment, which identified 48 archaeological sites have been recorded in or within 250 m of the current archaeology survey area.

As part of the prior I-495 Capital Beltway Managed Lanes Project, the Capital Beltway was surveyed by Diamante et al. (2008), who tested two previously recorded sites and identified 9 archaeological sites and 10 isolated finds. One of two previously identified sites and one of nine newly identified archaeological sites were recommended for further archaeological investigations that did not occur at that time.

Within the archaeology survey area, the preliminary assessment identified at least 49 discrete areas that appear to be undisturbed and warrant additional archaeological investigation (including inaccessible parcels identified by Diamante et al. 2008). Stormwater, wetland, reforestation, and other environmental stewardship and mitigation sites have not yet been identified, and additional areas requiring archaeological survey may be identified as the study is refined. In addition, the following archaeological resources may require further archaeological investigations; MDOT SHA will consult with MHT and appropriate consulting parties as we develop the scope of work for these resources.

- Previously recorded Site 18MO514 is within the National Register listed National Park Seminary Historic District (M:36-01) and determination of the eligibility of its archaeological component was beyond the scope of the investigation by Diamante et al. (2008).

- Site 18PR750 may be eligible for the National Register of Historic Places and Phase II testing is warranted to evaluate significance.
- The Montgomery County Poor Farm (18MO514) along I-270 should be evaluated for the possible presence of human remains associated with the cemetery.
- The Walker Family Cemetery (PG:67-3), located along the Capital Beltway immediately south of MD 201, is part of the NRHP listed Greenbelt Historic District.
- The C&O Canal National Historic Park (NR-12), including Canal Locks 12 through 14, is a National Historic Landmark property.

MDOT SHA will continue to consult with MHT and other consulting parties as the study evolves.

Review Request

Please examine the attached APE map (**Attachment 1**). We request your comments by May 11, 2018 on MDOT SHA's proposed I-495 and I-270 MLS. By carbon copy, we are inviting the relevant agencies, local government representatives, and historic groups (Attachment 3) to provide comments and participate in the Section 106 process. Federally recognized tribes will also be invited to consult.

MDOT SHA also looks forward to coordination with the Virginia Department of Transportation and the Virginia Department of Historical Resources for the portion of the study within Virginia jurisdiction.

Pursuant to the requirements of the implementing regulations found at 36 CFR Part 800, MDOT SHA seeks the attached parties' assistance in identifying historic preservation issues as they relate to this specific study (see 36 CFR §800.2(c)(3) and (5), and §800.3(f) for information regarding the identification and participation of consulting parties, and §800.4, and §800.5 regarding the identification of historic properties and assessment of effects). For additional information regarding the Section 106 regulations, see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact MDOT SHA or MHT. If you do not wish to consult on this study, please notify MDOT SHA.

MDOT SHA proposes to hold a consulting parties kickoff meeting at 11 a.m. on May 3, 2018 at the P3 Study Office located at 601 N. Calvert Street in Baltimore and invites all consulting parties to attend. If you are unable to attend the meeting but wish to receive information, please feel free to contact MDOT SHA using the contact information below.

Please contact Cultural Resources Team Leader Steve Archer (410-545-8508 or email sarcher@sha.state.md.us) for general questions about the Section 106 process for this study. Matt Manning may be reached at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures, and Richard Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Five

Sincerely,



Digitally signed by Steve Archer
DN: cn=Steve Archer,
o=Maryland State Highway
Administration, ou=Cultural
Resources Section/
Environmental Planning
Division,
email=SArcher@sha.state.md.us,
c=US

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc:

Ms. Julie Langan, Virginia State Historic Preservation Officer
Ms. Jeanette Mar, Environmental Manager, FHWA
Lisa B. Choplin, DBIA, Director, I-495 & I-270 P3 Office, MDOT SHA
Jeffrey Folden, P.E., DBIA, Deputy Director, I-495 & I-270 P3 Office, MDOT SHA (w/
Attachments)
Ms. Caryn Brookman, Environmental Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD

201802131

F
FHWA
TJT/
EJC

**Concurrence with the MD State Highway Administration's
Area of Potential Effects**

Project Number: AW073A11 MHT Log No. 201802131
Project **I-495 & I-270 Managed Lanes Study**
County: **Montgomery and Prince George's**
Letter Date: April 16, 2018

The Maryland Historical Trust has reviewed the documentation attached to the referenced letter and concurs with the MD State Highway Administration's determinations as follows:

Appropriate Area of Potential Effects (Attachment 1)

☒ Concur
☐ Do Not Concur

Eligibility (as noted in the Eligibility Table [N/A]):

☐ Concur
☐ Do Not Concur

Effect (as noted in the Effects Table [N/A]):

☐ No Properties Affected
☐ No Adverse Effect
☐ Conditioned upon the following action(s) (see comments below)
☐ Adverse Effect

Comments:

By:

Jim Taubman
MD State Historic Preservation Office/
Maryland Historical Trust

Date

5/17/18

Return by U.S. Mail or Facsimile to
Dr. Julie M. Schablitsky, Assistant Division Chief, Environmental Planning Division,
MD State Highway Administration, P.O. Box 717, Baltimore, MD 21203-0717
Telephone: 410-545-8870 and Facsimile: 410-209-5046
A-Proj #x Ervin/Manning

Cc: Ervin
Manning
Brookman

August 8, 2018

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion the enclosed *Archaeological and Historic Architectural Gap Analysis and Assessment* (Gap Analysis) associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland. MDOT SHA notified MHT of the study in an initiation letter dated April 12, 2018.

The Gap Analysis provides an inventory of recorded historical resources within the study area and identifies unsurveyed areas requiring archaeological investigation and architectural resources constructed in or before 1978. The Gap Analysis does not include cultural resources along the Virginia segment of the I-495 & I-270 MLS. The Virginia Department of Transportation will address inventory of historic properties for both archaeology and historic architecture in Virginia as part of the agency's ongoing project to extend the American Legion Memorial Bridge High Occupancy Toll (HOT) Lanes to the George Washington Parkway.

MDOT SHA's archaeological gap analysis identified 54 previously unsurveyed areas totaling 268 acres. Of those areas, 37 are recommended for full Phase I archaeological survey, and 17 are recommended for limited archaeological survey to assess integrity.

The architectural analysis identified 33 previously recorded National Register of Historic Places (NRHP)-eligible historic properties, including 11 that are listed on the NRHP. A total of 288 newly identified resources encompassing buildings, districts, parks, and linear resources, require evaluation for NRHP eligibility. MDOT SHA will evaluate these properties using a combination of regular Determination of Eligibility (DOE) forms, short forms, and MIHP Addendum forms.

Although not addressed in the gap analysis, MDOT SHA will work with consulting parties to identify any additional historic property types such as traditional cultural properties (TCPs) or cultural landscapes, as the project moves forward.

Ms. Elizabeth Hughes
Page Two

In the interest of streamlining and reducing costs to the state in the documentation of the numerous architectural resources, MDOT SHA proposes using the I-495 & I-270 MLS as a pilot to submit DOE forms without archival prints. Digital photos will include labels generated in white space below the image, as shown in the attached example (Attachment 2). This format ensures the legibility of photo labels. This digital labeling method meets National Park Service standards and has been accepted by the Virginia and Delaware SHPOs. MDOT SHA will maintain the original digital photos in TIFF format should MHT later request archival prints.

Please examine the attached Archaeological and Historic Architectural Gap Analysis and Assessment (Attachment 1). We request your comments by September 8, 2018 on MDOT SHA's Gap Analysis for the I-495 & I-270 MLS, and MHT's response regarding photo standards and labeling. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Sincerely,

 Digitally signed by Steve Archer
DN: cn=Steve Archer, o=Maryland
State Highway Administration,
ou=Cultural Resources Section/
Environmental Planning Division,
email=SArcher@sha.state.md.us,
c=US

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Caryn Brookman, Environmental Manager, I-495 & I-270 P3 Office, MDOT SHA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

October 19, 2018

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion the enclosed *Suburbanization Historic Context Addendum (1961-1980), Montgomery and Prince George's Counties, Maryland* (Context Addendum) and Batch 1 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland. MDOT SHA provided MHT with the Gap Analysis and Area of Potential Effects (APE) associated with the study in a letter dated August 8, 2018.

The Context Addendum supplements the original 1999 *Suburbanization Historic Context and Survey Methodology* prepared by KCI Technologies, Inc., and describes historical trends, property types, and significance assessment considerations for properties dating from the 1960-1980 period in Montgomery and Prince George's counties.

Batch 1 of MDOT SHA's historic architecture evaluations includes 15 resources within the MLS Study APE that were previously identified in the Maryland Inventory of Historic Properties. These resources were evaluated using 11 Determination of Eligibility (DOE) forms and 4 MIHP Addendum forms. MDOT SHA has determined that none of the properties evaluated in Batch 1 is eligible for the National Register of Historic Places (NRHP).

DOE Forms

M: 26-10-56	Reiche Cottage Stone House
M: 26-52	626 Great Falls Road
M: 29-42	Stoneyhurst Quarries
M: 30-17	Montgomery Bean House
M: 36-38	Forest Grove Neighborhood
M: 36-71	Montgomery Hills Baptist Church
PG:69-000	New Carrollton
PG:76A-31	John and Marie Darcey Houses

Ms. Elizabeth Hughes
Page Two

PG:76A-30 Linda Holmes House
PG:71A-54 Baltimore and Potomac RR, Washington City Branch District
PG:LAU-29 Baltimore and Ohio RR, Washington Branch District


MIHP Addendum Forms

M: 30-24 WMAL Transmitter Property
PG:73-22 4509 Jefferson Street
PG:73-23 8906 Ardwick-Ardmore Road
PG:73-24 4403 Jefferson Street

The Batch 1 submittal includes printed forms for each resource and an archival DVD with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled between March and June 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Context Addendum (Attachment 1), Batch 1 (Attachment 2), and Eligibility Table (Attachment 3). We request your comments by November 24, 2018, on MDOT SHA's Context Addendum. We also request your concurrence with MDOT SHA's Batch 1 eligibility determinations. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Sincerely,

 Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30105

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility/Status Table

Attachment #3

Project Name:

October 18, 2018

Resource	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-10-56 Reiche Cottage Stone House	S	X	Req. 11/2018	2	DOE
M: 26-52 626 Great Falls Road	S	X	Req. 11/2018	2	DOE
M: 29-42 Stoneyhurst Quarries	S	X	Req. 11/2018	2	DOE
M: 30-17 Montgomery Bean House	S	X	Req. 11/2018	2	DOE
M: 36-38 Forest Grove Neighborhood	HD	X	Req. 11/2018	2	DOE
M: 36-71 Montgomery Hills Baptist	S	X	Req. 11/2018	2	DOE
PG:69-000 New Carrollton	HD	X	Req. 11/2018	2	DOE
PG:76A-31 John and Marie Darcey Houses	S	X	Req. 11/2018	2	DOE
PG:76A-30 Linda Holmes House	S	X	Req. 11/2018	2	DOE
M: 30-24 WMAL Transmitter Property	S	X	Req. 11/2018	2	Addendum – demolished; NR 2000
PG:73-22 4509 Jefferson Street	S	X	Req. 11/2018	2	Addendum
PG:73-23 8906 Ardwick-Ardmore Road	S	X	Req. 11/2018	2	Addendum
PG:73-24 4403 Jefferson Street	S	X	Req. 11/2018	2	Addendum

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

November 27, 2018

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Montgomery and Prince George's Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the draft *Archaeological and Historic Architectural Gap Analysis and Assessment* (Gap Analysis) and the draft *Suburbanization Historic Context Addendum (1961-1980)* (MDOT 2018) prepared for the above-referenced undertaking. We would like to acknowledge the vast amount of research and field work conducted to compile a thorough historical context for this complex project area. We believe this work will facilitate project planning, future intensive survey efforts and the eventual development of a Programmatic Agreement (PA). We are providing our specific comments on the two draft reports in accordance with Section 106 of the National Historic Preservation Act.

Comments on the Gap Analysis: Trust staff reviewed the following document, *Archaeological and Historic Architectural Gap Analysis and Assessment* (July 2018) prepared by RK&K for MDOT SHA. Also, we met with MDOT SHA staff on April 18, 2018 to discuss the project's methodology. In general, we believe that the document proposes a reasonable and appropriate level of effort to complete the identification of historic and archeological properties within the current area of potential effects (APE), given the project scope and concentration of possible resources in the area. We have a few minor comments on the identification strategy. For the archeology efforts, we encourage team to utilize the Maryland Archeological Synthesis Project data to assist in developing defensible evaluations of National Register eligibility and placing sites within a broader context by region or site type. For architecture, the Trust does not recommend the survey and evaluation of electrical infrastructure. There is no need to evaluate the two linear power transmission lines with the project's APE.

Comments on the Suburbanization Historic Context Addendum (1961-1980): As mentioned above, this historic context addendum provides valuable information and insight into mid-twentieth century development trends within Maryland and will serve as a useful tool in the evaluation of the historic built environment for this study.

The context presents a comprehensive discussion of overall mainstream suburban development trends. However, the context should include further analysis of national and local trends, such as the sweeping authority of federal housing regulations and the suburban experience of local historically marginalized populations. For example, we learned that much of Maryland's suburban built environment in the mid-twentieth century was shaped by increasing influence of government regulators and planners at the federal, state and local levels. This context report excels when discussing the specific governmental policies and programs that affected development trends and directly impacted the physical character and social composition of communities during the period. This discussion could benefit from additional

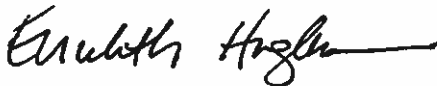
examination of how these laws directly influenced settlement patterns and the appearance of our suburban landscape. Most importantly, the report should include examples of how this phenomenon is expected to be represented in the local built environment.

The context addendum is a valuable tool for identifying historic properties within Maryland's ubiquitous mid-twentieth century suburban landscape. As additional knowledge is gained through fieldwork and research, we hope that the discussion of expected resource types and significance assessments can be further refined to provide examples and greater specificity. It would be helpful to identify the earliest examples of resource types and the anticipated construction date ranges for building types. Also, how is the suburban experience of historically excluded and marginalized groups manifested in the built environment? This information will aid in the identification of properties with the potential for representing important themes within this context report.

We look forward to ongoing coordination with MDOT SHA, FHWA, and the other consulting parties moving forward with implementation and review of the survey and evaluation efforts. Given the magnitude of survey efforts and level of consulting party involvement in the project, we strongly advocate that MDOT SHA provide the opportunity for consulting parties to view and provide input on the identification results concurrent with review by the Trust.

If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov / 410-697-9589 or Beth Cole (for archeology) at beth.cole@maryland.gov / 410-697-9541. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201804336&201805587

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

December 21, 2018

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 1”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 9 DOE forms and 4 MIHP Addenda represents the first batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study planning study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The following properties are not eligible for listing in the National Register:

MIHP No. M: 26-10-56 Reiche Cottage Stone House
MIHP No. M: 26-52 626 Great Falls Road
MIHP No. M: 29-42 Stoneyhurst Quarries
MIHP No. M: 30-17 Montgomery Bean House
MIHP No. M: 36-38 Forest Grove Neighborhood
MIHP No. M: 36-71 Montgomery Hills Baptist Church
MIHP No. PG:69-000 New Carrollton
MIHP No. PG:76A-31 John and Marie Darcey Houses
MIHP No. PG:76A-30 Linda Holmes House

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses.

If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov / 410-697-9589 or me (for archeology) at beth.cole@maryland.gov / 410-697-9541. Thank you for providing us this opportunity to comment.

Sincerely,



Beth Cole
Administrator, Project Review & Compliance

EH/BC/TJT/201805587

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

December 7, 2018

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 2 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

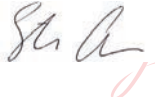
Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that 9 of the 16 properties evaluated in this submittal are eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled between March and June 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 2 eligibility determinations by January 7, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed by
Steve Archer
Adobe Acrobat
version:
2017.011.30106

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1

Project Name: I-495 & I-270 MLS - Batch 2

December 7, 2018

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 21-281	Londonderry Apartments and Towers	HD	X	Req. 1/2019	2	DOE
M: 26-71	Woodley Gardens	HD	NR	Req. 1/2019	2	DOE
M: 26-72	70-S Industrial Park	HD	X	Req. 1/2019	2	DOE
M: 26-72-1	Ward Building	S	NR	Req. 1/2019	2	DOE
M: 29-59-1	Greenfield House	S	X	Req. 1/2019	2	DOE
M: 29-69	Olde Carderock	HD	X	Req. 1/2019	2	DOE
M: 30-38	Academy Woods	HD	NR	Req. 1/2019	2	DOE
M: 30-39	Grosvenor Park	HD	NR	Req. 1/2019	2	DOE
M: 30-40	Marriott International Corporate Headquarters**	S	NR	Req. 1/2019	2	DOE
M: 31-71	Washington, DC Temple (Church of Jesus Christ of Latter-Day Saints)	S	NR	Req. 1/2019	2	DOE
M: 35-193	The Promenade	S	X	Req. 1/2019	2	DOE
PG:LAU-29	Baltimore and Ohio (B&O) Railroad, Washington Branch	S	NR	Req. 1/2019	2	DOE
PG:70-101	Gould Building	S	X	Req. 1/2019	2	DOE
PG:71A-54	Baltimore & Potomac Railroad, Washington City Branch (Pennsylvania Railroad, Baltimore and Potomac Division)	S	NR	Req. 1/2019	2	DOE
PG:72-26	Town of Glenarden	HD	NR	Req. 1/2019	2	DOE
PG:73-26	Town of Glenarden	HD	NR	Req. 1/2019	2	DOE
PG:76A-60	National Oceanic and Atmospheric Administration (NOAA) World Weather Building	S	X	Req. 1/2019	2	DOE

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

****Although construction began in 1978, Marriott HQ was not opened until early 1979. For the purposes of evaluation, MDOT SHA considers this building to fall within the 40 year period identified in the Gap Analysis.**

February 22, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 2”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 16 DOE forms represents the second batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following properties are eligible for listing in the National Register:

MIHP No. M: 26-71 Woodley Gardens
MIHP No. PG:LAU-29 Baltimore & Ohio Railroad, Washington Branch
MIHP No. PG:71A-54 Baltimore & Potomac Railroad, Washington City Branch
MIHP No. PG:72-26 Town of Glenarden

As you know, the National Register Criteria for Evaluation exclude properties that achieved significance within the past fifty years unless they are of exceptional importance, and therefore, meet National Register Criteria Consideration G. Several of the properties evaluated within Batch 2 of this study are less than fifty years old and do not meet the requirements of Criteria Consideration G. However, these properties will reach or surpass the fifty-year age threshold during the duration of the undertaking and they represent important themes identified in the *Suburbanization Historic Context Addendum (1961-1980)* (MDOT 2018). Therefore, we concur with MDOT SHA that the following properties will be treated as National Register-eligible solely for the purposes of the I-495 & I-270 Managed Lanes Study:

MIHP No. M: 26-72-1 Ward Building
MIHP No. M: 30-38 Academy Woods
MIHP No. M: 30-39 Grosvenor Park
MIHP No. M: 31-71 Washington DC Temple

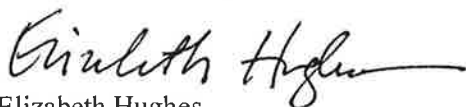
The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

MIHP No. M: 21-281 Londonderry Apartments and Towers
MIHP No. M: 26-72 70-S Industrial Park
MIHP No. M: 29-59-1 Greenfield House
MIHP No. M: 29-69 Olde Carderock
MIHP No. M: 35-193 The Promenade
MIHP No. PG:70-101 Gould Building
MIHP No. PG:76A-60 NOAA World Weather Building

MIHP No. M: 30-40 Marriott International Corporate Headquarters – The Trust does not concur with MDOT SHA's recommendation that this property is eligible for the National Register under Criterion C. The property primarily reflects an expansion of the facility during the mid-1980s. Since the majority of the property will not reach the fifty-year age threshold during the project planning study, it is the Trust's opinion that the property is not eligible for the National Register.

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov.
Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201806345

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

January 7, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 3 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that 4 of the 18 properties evaluated in this submittal are eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled between March and June 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 3 eligibility determinations by February 7, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed by
Steve Archer
Adobe Acrobat
version:
2017.011.30110

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1

Project Name: I-495 & I-270 MLS - Batch 3

January 2, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 21-282	Brighton Village East	HD	X	Req. 2/2019	2	DOE
M: 21-283	Brighton West Condominiums	HD	X	Req. 2/2019	2	DOE
M: 21-284	Fireside Condominiums	HD	X	Req. 2/2019	2	DOE
M: 26-73	Tracor Applied Sciences	S	X	Req. 2/2019	2	DOE
M: 31-72	Cedar Lane Unitarian Church	S	NR	Req. 2/2019	2	DOE
M: 31-73	Phillips House	S	X	Req. 2/2019	2	DOE
M: 33-31	Washington Coca-Cola Bottling Plant (Silver Spring)	S	NR	Req. 2/2019	2	DOE
M: 35-194	Carderock Springs South	HD	NR	Req. 2/2019	2	DOE
M: 35-195	Prelude	HD	X	Req. 2/2019	2	DOE
M: 37-35	Good Shepherd United Methodist Church	S	X	Req. 2/2019	2	DOE
PG:67-40-1	Maryland State Savings and Loan Association (Greenbelt)	S	X	Req. 2/2019	2	DOE
PG:72-26	New Carrollton Metrorail Station and Yard	HD	NR	Req. 2/2019	2	DOE
Short	722 W. Montgomery Avenue	S	X	Req. 2/2019	2	Short
Short	6940 Seven Locks Road	S	X	Req. 2/2019	2	Short
Short	7205 Longwood Drive	S	X	Req. 2/2019	2	Short
Short	10316 Fleming Avenue	S	X	Req. 2/2019	2	Short
Short	First Baptist Church of Rockville	S	X	Req. 2/2019	2	Short
Short	Rockville Christian Church	S	X	Req. 2/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

February 22, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 3”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 18 DOE forms represents the third batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following properties are eligible for listing in the National Register:

MIHP No. M: 31-72 Cedar Lane Unitarian Church
MIHP No. M: 33-31 Washington Coca-Cola Bottling Plant Silver Spring
MIHP No. M: 35-194 Carderock Springs South

As you know, the National Register Criteria for Evaluation exclude properties that achieved significance within the past fifty years unless they are of exceptional importance, and therefore, meet National Register Criteria Consideration G. One of the properties evaluated within Batch 3 of this study is less than fifty years old and does not meet the requirements of Criteria Consideration G. However, this property will reach or surpass the fifty-year age threshold during the duration of the undertaking and it represents important themes identified in the Suburbanization Historic Context Addendum (1961-1980) (MDOT 2018). Therefore, we concur with MDOT SHA that the following property will be treated as National Register-eligible solely for the purposes of the I-495 & I-270 Managed Lanes Study:

MIHP No. PG:72-76 New Carrollton Metrorail Station and Yard

The Trust concurs that the following properties are not eligible for listing in the National Register:

MIHP No. M: 21-282 Brighton Village East
MIHP No. M: 21-283 Brighton West Condominiums
MIHP No. M: 21-284 Fireside Condominiums
MIHP No. M: 26-73 Tracor Applied Sciences
MIHP No. M: 31-73 Phillips House
MIHP No. M: 35-195 Prelude
MIHP No. M: 37-35 Good Shepherd Methodist Church
MIHP No. PG:67-40-1 MD State Saving & Loan Association (Greenbelt)
Rockville Christian Church, 301 Adclare Road
First Baptist Church of Rockville, 55 Adclare Road
10316 Fleming Avenue, Bethesda
7205 Longwood Drive, Bethesda
6940 Seven Locks Road, Cabin John
722 W. Montgomery Avenue, Rockville

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov.
Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201806345

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)
Jim Ashe (WMATA)

February 7, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 4 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.


Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that one of the 28 properties evaluated in this submittal is eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled between March and June 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 4 eligibility determinations by March 7, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed by
Steve Archer
Adobe Acrobat
version:
2017.011.30113

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1

Project Name: I-495 & I-270 MLS - Batch 4

February 6, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-74	Briarglen	HD	X	Req. 3/2019	2	DOE
M: 26-75	Markwood	HD	X	Req. 3/2019	2	DOE
M: 26-77	Saddlebrook	HD	X	Req. 3/2019	2	DOE
M: 26-78	Roxboro	HD	X	Req. 3/2019	2	DOE
M: 29-70	Congressional Country Club Estates	HD	X	Req. 3/2019	2	DOE
M: 29-71	Seven Locks Hills	HD	X	Req. 3/2019	2	DOE
M: 29-72	Burning Tree Estates	HD	X	Req. 3/2019	2	DOE
M: 30-41	Fernwood Estates	HD	X	Req. 3/2019	2	DOE
M: 30-42	Georgetown Village	HD	X	Req. 3/2019	2	DOE
M: 30-43	North Bethesda Grove	HD	X	Req. 3/2019	2	DOE
M: 30-44	Ashburton	HD	X	Req. 3/2019	2	DOE
M: 35-196	Arrowood	HD	X	Req. 3/2019	2	DOE
M: 35-197	Bethesda Overlook	HD	X	Req. 3/2019	2	DOE
M: 35-198	Bradley Manor	HD	X	Req. 3/2019	2	DOE
M: 35-199	Hawley Estate	S	NR	Req. 3/2019	2	DOE
M: 35-200	Persimmon Tree	HD	X	Req. 3/2019	2	DOE
M: 35-201	St. Jane Frances de Chantal Church and St. Jane de Chantal School	S	X	Req. 3/2019	2	DOE
	Best Western Capital Beltway	S	X	Req. 3/2019	2	Short
	Best Western Plus Rockville Hotel and Suites	S	X	Req. 3/2019	2	Short
	Bethesda Fire Department 26	S	X	Req. 3/2019	2	Short
	Geico Materials Center	S	X	Req. 3/2019	2	Short
	Holiday Inn Washington College Park	S	X	Req. 3/2019	2	Short
	Red Lobster (Gaithersburg)	S	X	Req. 3/2019	2	Short
	Rockville Nursing Home	S	X	Req. 3/2019	2	Short
	Xerox Data Systems (BioMed Realty Trust)	S	X	Req. 3/2019	2	Short
	7401 Bradley Boulevard	S	X	Req. 3/2019	2	Short
	7415 Bradley Boulevard	S	X	Req. 3/2019	2	Short
	7330 Arrowood Road	S	X	Req. 3/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

March 26, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 4”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 28 DOE forms represents the fourth batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following property is eligible for listing in the National Register:
MIHP No. M: 35-199 Hawley Estate (Federation of American Societies for Experimental Biology)

The Trust concurs that the following properties are not eligible for listing in the National Register:

MIHP No. M: 26-74 Briarglen
MIHP No. M: 26-75 Markwood
MIHP No. M: 26-77 Saddlebrook
MIHP No. M: 26-78 Roxboro
MIHP No. M: 29-70 Congressional Country Club Estates
MIHP No. M: 29-71 Seven Locks Hills
MIHP No. M: 29-72 Burning Tree Estates
MIHP No. M: 30-41 Fernwood Estates
MIHP No. M: 30-42 Georgetown Village
MIHP No. M: 30-43 North Bethesda Grove
MIHP No. M: 30-44 Ashburton
MIHP No. M: 35-196 Arrowood
MIHP No. M: 35-197 Bethesda Overlook

MIHP No. M: 35-198 Bradley Manor
MIHP No. M: 35-200 Persimmon Tree
MIHP No. M: 35-201 St. Jane Frances de Chantal Church and St. Frances de Chantal School
7330 Arrowood Road
7401 Bradley Boulevard
7415 Bradley Boulevard
Best Western Capital Beltway
Best Western Plus Rockville Hotel & Suites
Bethesda Fire Department 26
Geico Materials Management Center
Holiday Inn Washington College Park
Red Lobster (Gaithersburg)
Rockville Nursing Home
Xerox Data Systems (BioMed Realty Trust)

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov.
Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201900558

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

March 8, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 5 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.


Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that none of the properties evaluated in this submittal are eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, expected around June 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 5 eligibility determinations by April 9, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30127

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1

Project Name: I-495 & I-270 MLS - Batch 5

March 8, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-76	Rockshire Village	HD	X	Req. 4/2019	2	DOE
M: 26-79	Fallswood	HD	X	Req. 4/2019	2	DOE
M: 26-80	North Farm	HD	X	Req. 4/2019	2	DOE
M: 26-81	West End Park Section 2	HD	X	Req. 4/2019	2	DOE
M: 29-73	Montgomery Mall (Westfield Montgomery)	HD	X	Req. 4/2019	2	DOE
M: 29-74	Seven Locks Manor	HD	X	Req. 4/2019	2	DOE
M: 29-75	Watkins Glen	HD	X	Req. 4/2019	2	DOE
M: 29-76	Wildwood Hills	HD	X	Req. 4/2019	2	DOE
M: 30-45	Alta Vista Gardens	HD	X	Req. 4/2019	2	DOE
M: 30-46	Windermere	HD	X	Req. 4/2019	2	DOE
M: 30-47	John Henry O'Neale House	S	X	Req. 4/2019	2	DOE
M: 30-48	Montrose Woods	HD	X	Req. 4/2019	2	DOE
M: 30-49	Stratton Commons	HD	X	Req. 4/2019	2	DOE
M: 30-50	Stratton Woods	HD	X	Req. 4/2019	2	DOE
M: 30-51	Tusculum and Grubby Thicket	HD	X	Req. 4/2019	2	DOE
M: 30-52	Wildwood Knolls	HD	X	Req. 4/2019	2	DOE
M: 30-53	Wildwood Manor	HD	X	Req. 4/2019	2	DOE
M: 33-32	Hillandale Shopping Center	HD	X	Req. 4/2019	2	DOE
M: 35-202	Tusculum Woods	HD	X	Req. 4/2019	2	DOE
M: 35-203	Linden Hill Towers	S	X	Req. 4/2019	2	DOE
PG:70-102	Dresden Green	HD	X	Req. 4/2019	2	DOE
PG:70-103	Whitfield Woods	HD	X	Req. 4/2019	2	DOE
PG:72-77	Ardwick Industrial District	HD	X	Req. 4/2019	2	DOE
	2406 Muskogee Street	S	X	Req. 4/2019	2	Short
	2407 Muskogee Street	S	X	Req. 4/2019	2	Short
	3315 Glenmoor Drive	S	X	Req. 4/2019	2	Short

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
	4 Choke Cherry Road	S	X	Req. 4/2019	2	Short
	Bowlmor Rockville	S	X	Req. 4/2019	2	Short
	Christman Park	S	X	Req. 4/2019	2	Short
	CIESBD Thrift Store and Office	S	X	Req. 4/2019	2	Short
	College Park Animal Hospital	S	X	Req. 4/2019	2	Short
	Comfort Zone	S	X	Req. 4/2019	2	Short
	Hillandale Center	S	X	Req. 4/2019	2	Short
	Hollywood Square	S	X	Req. 4/2019	2	Short
	Holy Cross Hospital	S	X	Req. 4/2019	2	Short
	Interstate Corporation	S	X	Req. 4/2019	2	Short
	Just Tires (Hyattsville)	S	X	Req. 4/2019	2	Short
	Life Time Athletic (Potomac)	S	X	Req. 4/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

April 17, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 5”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 38 DOE forms represents the fifth batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

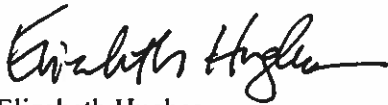
The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

MIHP No. M: 26-76 Rockshire Village
MIHP No. M: 26-79 Fallswood
MIHP No. M: 26-80 North Farm
MIHP No. M: 26-81 West End Park Section 2
MIHP No. M: 29-73 Montgomery Mall (Westfield Montgomery)
MIHP No. M: 29-74 Seven Locks Manor
MIHP No. M: 29-75 Watkins Glen
MIHP No. M: 29-76 Wildwood Hills
MIHP No. M: 30-45 Alta Vista Gardens
MIHP No. M: 30-46 Windermere
MIHP No. M: 30-47 John Henry O’Neale House
MIHP No. M: 30-48 Montrose Woods
MIHP No. M: 30-49 Stratton Commons
MIHP No. M: 30-50 Stratton Woods
MIHP No. M: 30-51 Tusculum and Grubby Thicket
MIHP No. M: 30-52 Wildwood Knolls

MIHP No. M: 30-53 Wildwood Manor
MIHP No. M: 33-32 Hillandale Shopping Center
MIHP No. M: 35-202 Tusculum Woods
MIHP No. M: 35-203 Linden Hill Towers
MIHP No. PG:70-102 Dresden Green
MIHP No. PG:70-103 Whitfield Woods
MIHP No. PG:72-77 Ardwick Industrial District
2406 Muskogee Street
2407 Muskogee Street
3315 Glenmoor Drive
4 Coke Cherry Road
Bowlmor Rockville
Christman Park
CIESBD Thrift Store and Office Building
College Park Animal Hospital
Comfort Zone
Hillandale Center
Hollywood Square
Holy Cross Hospital
Interstate Corporation
Just Tires (Hyattsville)
Life Time Athletic (Potomac)

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201901035

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

April 8, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 6 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.


Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that 1 of the 37 properties evaluated in this submittal is eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled for August 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 6 eligibility determinations by May 8, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30127

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1

Project Name: I-495 & I-270 MLS - Batch 6

April 8, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 20-50	Shady Grove Development Park, Parcel 2	S	X	Req. 5/2019	2	DOE
M: 26-82	Montgomery County Detention Center and Rockville Police Station (District 1)	S	X	Req. 5/2019	2	DOE
M: 29-77	Willerburn Acres	HD	X	Req. 5/2019	2	DOE
M: 30-54	Old Farm	HD	X	Req. 5/2019	2	DOE
M: 31-74	Forest Glen Knolls	HD	X	Req. 5/2019	2	DOE
M: 31-75	Forest Glen Road Houses	HD	X	Req. 5/2019	2	DOE
M: 31-76	Carolyn Hill Apartments	S	X	Req. 5/2019	2	DOE
M: 32-35	Argyle Forest South Section	HD	X	Req. 5/2019	2	DOE
M: 32-36	Franklin Knolls	HD	X	Req. 5/2019	2	DOE
M: 33-33	Hampshire Forest	HD	X	Req. 5/2019	2	DOE
M: 33-34	Holly Hall Apartments	S	X	Req. 5/2019	2	DOE
M: 33-35	Hillandale Forest	HD	X	Req. 5/2019	2	DOE
PG:65-54						
M: 35-204	Wolfe's Subdivision	HD	X	Req. 5/2019	2	DOE
M: 36-87	Rock Creek Stream Valley Park, Units 2 and 3	HD	NR	Req. 5/2019	2	DOE
M: 36-94	Forest Glen Park	HD	X	Req. 5/2019	2	DOE
M: 36-95	Northmont	HD	X	Req. 5/2019	2	DOE
M: 37-36	Greenwich Woods	HD	X	Req. 5/2019	2	DOE
PG:65-55						
PG:65-50	Adelphi Forest	HD	X	Req. 5/2019	2	DOE
PG:65-51	Holly Hill Manor	HD	X	Req. 5/2019	2	DOE
PG:65-52	Holly Hill Terrace	HD	X	Req. 5/2019	2	DOE
PG:65-53	Knollwood	HD	X	Req. 5/2019	2	DOE

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach	Remarks
M: 37-15	Oakview	S	X	Req. 5/2019	2	Addendum
-	9601 Parkwood Drive	S	X	Req. 5/2019	2	Short
-	9816 Riggs Road	S	X	Req. 5/2019	2	Short
-	10001-10013 Rhode Island Avenue	S	X	Req. 5/2019	2	Short
-	D & F Construction Warehouse	S	X	Req. 5/2019	2	Short
-	Former Amoco Gas and Service Station (Forest Glen)	S	X	Req. 5/2019	2	Short
-	Former Co-op Gas and Service Station (Greenbelt)	S	X	Req. 5/2019	2	Short
-	Holly View Apartments	S	X	Req. 5/2019	2	Short
-	Industrial Bank	S	X	Req. 5/2019	2	Short
-	Lanham Strip Center	S	X	Req. 5/2019	2	Short
-	Montgomery County Division of Facilities Management	S	X	Req. 5/2019	2	Short
-	Montgomery County Public Schools Transportation and Facilities Maintenance Bethesda Depot	S	X	Req. 5/2019	2	Short
-	Seven Locks Plaza (Potomac Woods Plaza)	S	X	Req. 5/2019	2	Short
-	Silver Spring Volunteer Fire Station 16	S	X	Req. 5/2019	2	Short
-	Strip Center, 9002 Lanham Severn Road	S	X	Req. 5/2019	2	Short
-	Texaco/Exxon Gas Station (Suitland)	S	X	Req. 5/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

May 30, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 6”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 37 DOE forms represents the sixth batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following property is eligible for listing in the National Register:
MIHP No. M: 36-87 Rock Creek Stream Valley Park, Units 2 and 3; This property is National Register-eligible under Criterion A, however, the B&O Railroad Trestle Bridge (MIHP No. M: 36-29) is unrelated to the development of the park and does not contribute to its significance.

The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

- MIHP No. M: 20-50 Shady Grove Development Park, Parcel 2
- MIHP No. M: 26-82 Montgomery County Detention Center and Rockville Police Station (District 1)
- MIHP No. M: 29-77 Willerburn Acres
- MIHP No. M: 30-54 Old Farm
- MIHP No. M: 31-74 Forest Glen Knolls
- MIHP No. M: 31-75 Forest Glen Road Houses
- MIHP No. M: 31-76 Carolyn Hill Apartments
- MIHP No. M: 32-35 Argyle Forest South Section
- MIHP No. M: 32-36 Franklin Knolls
- MIHP No. M: 33-33 Hampshire Forest
- MIHP No. M: 33-34 Holly Hall Apartments
- MIHP No. M: 33-35/PG:65-54 Hillandale Forest
- MIHP No. M: 35-204 Wolfe’s Subdivision
- MIHP No. M: 36-94 Forest Glen Park

MIHP No. M: 36-95 Northmont
MIHP No. M: 37-36/PG:65-55 Greenwich Woods
MIHP No. PG:65-50 Adelphi Forest
MIHP No. PG:65-51 Holly Hill Manor
MIHP No. PG:65-52 Holly Hill Terrace
MIHP No. PG:65-53 Knollwood
9601 Parkwood Drive
9816 Riggs Road
10001-10013 Rhode Island Avenue
D&F Construction Warehouse
Former Amoco Gas and Service Station (Forest Glen)
Former Co-op Gas and Service Station (Greenbelt)
Holly View Apartments
Industrial Bank
Lanham Strip Center
Montgomery County Division of Facilities Management
Montgomery County Public Schools Transportation and Facilities Maintenance Bethesda Depot
Seven Locks Plaza (Potomac Woods Plaza)
Silver Spring Volunteer Fire Station 16
Strip Center, 9002 Lanham Severn Road
Texaco/Exxon Gas Station (Suitland)

Finally, a portion of the Oakview community (MIHP No. M: 37-15) was previously surveyed and determined ineligible for the National Register in 2000. We agree with MDOT SHA that the survey boundary for this subdivision should be expanded to encompass additional associated residences and amenities that were omitted from the original documentation. The expanded geographic survey area was described and assessed using an MIHP Addendum Form. However, in order to formally evaluate the expanded survey area, we request the preparation of a DOE form containing the National Register evaluation to accompany the updated survey information supplied on the Addendum form.

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes

Director/State Historic Preservation Officer

EH/BC/TJT/201901808

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

May 8, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 7 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that one of the 37 properties evaluated in this submittal is eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled for July 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 7 eligibility determinations by June 7, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed by
Steve Archer
Adobe Acrobat
version:
2017.011.30140

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1 (2 pages)

Project Name: I-495 & I-270 MLS - Batch 7

May 7, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-83	Montgomery County Fleet Management	S	X	Req. 6/2019	2	DOE
M: 31-77	Forest Glen Tract (West Section)	HD	X	Req. 6/2019	2	DOE
M: 31-78	Rock Creek Hills Section 2	HD	X	Req. 6/2019	2	DOE
M: 31-79	Thomas W. Riley Estate Subdivision	HD	X	Req. 6/2019	2	DOE
M: 32-34	Indian Spring Club Estates and Indian Spring Country Club	HD	NR	Req. 6/2019	2	DOE
M: 35-205	Parkview	HD	X	Req. 6/2019	2	DOE
M: 35-206	Park View Estates	HD	X	Req. 6/2019	2	DOE
M: 35-207	Rolling Hills	HD	X	Req. 6/2019	2	DOE
M: 35-208	Spring Hill	HD	X	Req. 6/2019	2	DOE
PG:61-43	Powder Mill Estates	HD	X	Req. 6/2019	2	DOE
PG:61-85	Powder Mill Village	HD	X	Req. 6/2019	2	DOE
PG:65-56	White Oak Manor	HD	X	Req. 6/2019	2	DOE
PG:69-69	Carrollan Manor Apartments	HD	X	Req. 6/2019	2	DOE
PG:70-104	Addition to Lanham Acres	HD	X	Req. 6/2019	2	DOE
PG:70-105	Lanham Acres	HD	X	Req. 6/2019	2	DOE
M: 37-37/ PG:65-57	The Chateau	S	X	Req. 6/2019	2	DOE
-	4705 Edgewood Road	S	X	Req. 6/2019	2	Short
-	4933 Whitfield Chapel Road	S	X	Req. 6/2019	2	Short
-	6010 Princess Garden Parkway	S	X	Req. 6/2019	2	Short
-	7101 Greenbelt Road	S	X	Req. 6/2019	2	Short
-	9116-9120 Levelle Drive	S	X	Req. 6/2019	2	Short
-	9808 47th Place	S	X	Req. 6/2019	2	Short
-	9907 51st Avenue	S	X	Req. 6/2019	2	Short
-	Forestville Volunteer Fire Department	S	X	Req. 6/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
-	Former Amoco Gas and Service Station (Suitland)	S	X	Req. 6/2019	2	Short
-	Former Andrews Esso Gas and Service Station	S	X	Req. 6/2019	2	Short
-	Former Holiday Inn (Suitland)	S	X	Req. 6/2019	2	Short
-	Former Princess Garden Special Center	S	X	Req. 6/2019	2	Short
-	Former Sheraton of Washington Northeast	S	X	Req. 6/2019	2	Short
-	Indian Spring Terrace Park	S	X	Req. 6/2019	2	Short
-	K-Mart Plaza (Landover Crossing)	S	X	Req. 6/2019	2	Short
-	Marlo Furniture Warehouse and Showroom (Forestville)	S	X	Req. 6/2019	2	Short
-	Maryland State Police Barrack L Forestville	S	X	Req. 6/2019	2	Short
-	McDonald's (Suitland)	S	X	Req. 6/2019	2	Short
-	Sheehy Ford of Marlow Heights	S	X	Req. 6/2019	2	Short
-	Strip Center, 4767-4773 Allentown Road	S	X	Req. 6/2019	2	Short
-	Texaco-Shell Gas and Former Service Station (Suitland)	S	X	Req. 6/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

August 8, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 7”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 37 DOE forms represents the seventh batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following property is eligible for listing in the National Register:

MIHP No. M: 32-34 Indian Spring Club Estates and Indian Spring Country Club
This property is National Register-eligible under Criteria A, B and C as a planned suburban community by Jewish developers for the Jewish community utilizing mass-production techniques for the construction of architecturally distinctive homes targeted to the middle class.

The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

MIHP No. M: 26-83 Montgomery County Fleet Management
MIHP No. M: 31-77 Forest Glen Tract (West Section)
MIHP No. M: 31-78 Rock Creek Hills Section 2
MIHP No. M: 31-79 Thomas W. Riley Estate Subdivision
MIHP No. M: 35-205 Parkview
MIHP No. M: 35-206 Park View Estates
MIHP No. M: 35-207 Rolling Hills
MIHP No. M: 35-208 Spring Hill
MIHP No. PG:61-43 Powder Mill Estates
MIHP No. PG:61-85 Powder Mill Village
MIHP No. PG:65-56 While Oak Manor
MIHP No. PG:69-69 Carrollan Manor Apartments
MIHP No. PG:70-104 Addition to Lanham Acres

MIHP No. PG:70-105 Lanham Acres
MIHP No. M: 37-37 and PG:65-57 The Chateau
4705 Edgewood Road
4933 Whitfield Chapel Road
6010 Princess Garden Parkway
7101 Greenbelt Road
9116-9120 Levelle Drive
9808 47th Place
9907 51st Avenue
Forestville Volunteer Fire Department
Former Amoco Gas and Service Station (Suitland)
Former Andrews Esso Gas and Service Station
Former Holiday Inn (Suitland)
Former Princess Garden Special Center
Former Sheraton of Washington Northeast
Indian Spring Terrace Park
K-Mart Plaza (Landover Crossing)
Marlo Furniture Warehouse and Showroom (Forestville)
Maryland State Police Barrack L Forestville
McDonald's (Suitland)
Sheehy Ford of Marlow Heights
Strip Center, 4767-4773 Allentown Road
Texaco-Shell Gas and Former Service Station (Suitland)

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201902237

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

May 14, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville, MD 21032-2023

Ms. Julie Langan
State Historic Preservation Officer
Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Hughes and Ms. Langan:

This letter serves to inform the Maryland Historical Trust (MHT) and The Virginia Department of Historic Resources (VDHR) of an update to the Maryland Department of Transportation State Highway Administration (MDOT SHA) proposed Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The project is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland. The study limits of the I-495 & I-270 MLS encompass I-495 from south of the American Legion Bridge in Fairfax County, Virginia, to west of MD 5 and I-270 from I-495 north to I-370, including the east and west I-270 spurs along I-495.

On April 16, 2018, MDOT SHA submitted a preliminary Area of Potential Effects (APE) for the I-495 & I-270 MLS. MHT accepted MDOT SHA's APE definition on May 17, 2018 (MHT Log 201802131). At that time, MDOT SHA did not anticipate the need for substantial historic properties identification efforts within Virginia. Since that time, MDOT SHA has conducted additional constructability analysis for replacement of the American Legion Bridge, and coordinated with the Virginia Department of Transportation (VDOT) and the National Park Service (NPS) on project evaluation needs. As a result, the APE in the vicinity of the American Legion Bridge, C&O Canal National Historical Park, and within Virginia has changed. The MLS limits in Virginia overlap with the study area of VDOT's 495 Express Lanes Northern Extension (NEXT) study; MDOT SHA and VDOT are continuing to coordinate our historic properties inventory efforts and expect to use the results of each agency's architectural and archaeological surveys to support effect findings and/or development of Programmatic Agreements for the respective agency projects.

The revised I-495 & I-270 MLS APE is included as Attachment 1.

Architecture: VDOT is currently conducting survey and evaluation of historic architectural resources within the proposed MLS APE in Virginia, using the same survey cut-off date, 1978, established in MDOT SHA's Gap Analysis. Based on design evolution and in consideration of VDOT's NEXT project, MDOT SHA's APE is more precisely defined than the remainder of the corridor in Maryland, taking into account existing noise barriers and other factors that would shield adjacent properties from indirect effects. At this time MDOT SHA generally adopts VDOT's proposed architectural survey boundary along I-495 in Virginia and along the George Washington Memorial Parkway (GWMP) as sufficient for the MLS APE in Virginia. The GWMP and the Georgetown Pike are the only existing NRHP eligible or listed properties within the APE in Virginia. According to the Georgetown Pike NRHP nomination, the .53-mile section of the Georgetown Pike that provides access to I-495 within the APE does not contribute to the Georgetown Pike's significance. MDOT SHA believes that the results of VDOT's in-progress architectural history survey efforts will be sufficient to identify architectural resources potentially affected by the MDOT SHA MLS.

Archaeology:

Because design refinement has occurred since initiation of consultation, MDOT SHA's archaeological survey area is also more specifically defined in the Legion Bridge crossing vicinity and in Virginia, within and adjacent to the GWMP. As opposed to a general corridor survey boundary defined as an arbitrary distance from right-of-way, MDOT SHA is using the combined worst-case LOD of alternatives currently under consideration as the survey area for archaeology. For constructability, the LOD/archaeological survey area has been expanded within the C&O Canal property within Maryland. Additionally, potential conduit and signage needs have been identified along the GWMP. Several known archaeological resources and unsurveyed areas are known to be present along and adjacent to the GWMP in Virginia. MDOT SHA is coordinating with the National Park Service on an Archaeological Resources Protection Act (ARPA) permit and will coordinate with VDHR on the proposed survey and evaluation methods for archaeological resources in Virginia.

Review Request

Please examine the attached APE (**Attachment 1**). We request your comments by June 17, 2019 on MDOT SHA's revised I-495 & I-270 MLS APE in Maryland and Virginia in the general vicinity shown of the American Legion Bridge and along the GWMP. By email carbon copy, we are inviting the relevant agencies, local government representatives, and historic groups to provide comments and participate in the Section 106 process. Federally recognized tribes will also be invited to comment, including additional coordination with Federally Recognized Tribes in Virginia, as the previous APE definition and communication did not anticipate archaeological work by MDOT SHA within Virginia.

Ms. Elizabeth Hughes
Page Three

Pursuant to the requirements of the implementing regulations found at 36 CFR Part 800, MDOT SHA seeks the copied parties' assistance in identifying historic preservation issues as they relate to this specific project (see 36 CFR §800.2(c)(3) and (5), and §800.3(f) for information regarding the identification and participation of consulting parties, and §800.4, and §800.5 regarding the identification of historic properties and assessment of effects.

Please contact MDOT SHA Cultural Resources Team Leader Steve Archer at (410) 545-8508 or via email at sarcher@mdot.maryland.gov with any questions or information needs on this project.

Sincerely,



Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30140

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc:

Ms. Jeanette Mar, Environmental Manager, FHWA Maryland Division
Mr. Tony Opperman, VDOT
Ms. Sarah Clarke, VDOT
Ms. Lisa B. Choplin, DBIA, Director, I-495 & I-270 P3 Office, MDOT SHA
Mr. Jeffrey Folden, P.E., DBIA, Deputy Director, I-495 & I-270 P3 Office, MDOT SHA
(w/ Attachments)
Ms. Caryn Brookman, Environmental Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD



COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Matt Strickler
Secretary of Natural Resources

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

10 June 2019

Ms Julie M. Schablitsky
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Revised Area of Potential Effects for the I-495 and I-270 Managed Lanes Study
MDOT SHA Study No. AW073A11
DHR File No. 2018-0251

Dear Ms Schablitsky:

The Department of Historic Resources (DHR) has received for our review and comment the revised Area of Potential Effects (APE) as defined by the Maryland Department of Transportation State Highway Administration (MDOT SHA) for the proposed I-495 and I-270 Managed Lanes Study (MLS). The revised definition of the APE is a result of MDOT SHA's additional constructability analysis for replacement of the American Legion Bridge, and further coordination with the Virginia Department of Transportation (VDOT) and the National Park Service (NPS). As a result, the APE in the vicinity of the American Legion Bridge, C & O Canal National Historical Park, and within Virginia has changed. It is our understanding that the MLS limits in Virginia overlap with the VDOT study area for its I-495 Express Lanes Northern Expansion (NEXT) study. The MDOT SHA and VDOT plan to use the results of each other's architectural and archaeological surveys to support the respective agency's effect findings and/or development of a Programmatic Agreement.

The DHR, which in Virginia is the State Historic Preservation Office, was contacted by the NPS George Washington Memorial Parkway (GWMP) unit regarding the current MDOT SHA redefinition of the MLS APE. It expressed concern that the new APE does is not large enough to adequately address anticipated visual effects from tree clearing

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Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
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Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

Page 2
10 June 2019
Ms Julie M. Schablitsky

associated with the undertaking and temporary construction access. We were told that there is planned an estimated fourteen (14) acres of tree clearing on the Virginia side of the MLS, which includes both permanent and temporary vegetative loss. If this is the case, the DHR shares NPS GWMP's position that an expanded APE may be necessary to account for visual effects due to tree removal. Before DHR concurs with the new definition of the APE we request that the MDOT SHA respond to NPS GWMP and DHR regarding this issue.

If you have any questions about our comments, please contact me at (804) 482-6090.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Holma", written in a cursive style.

Marc Holma, Architectural Historian
Division of Review and Compliance

C: Ms Sarah Clarke, VDOT
Mr. Tony Opperman, VDOT
Mr. Matt Virta, NPS GWMP
Mr. Bradley Krueger, NPS GWMP

**Concurrence with the MD State Highway Administration's
Determination(s) of Eligibility and/or Effects**

Project Number: AW073A11 **MHT Log No.** 201902528
Project I-495 & I-270 Managed Lanes Study
County: Montgomery and Prince George's
Letter Date: May 15, 2019

The Maryland Historical Trust has reviewed the documentation attached to the referenced letter and concurs with the MD State Highway Administration's determinations as follows:

Appropriate Area of Potential Effects (Attachment 1)

☒ Concur
☐ Do Not Concur

Eligibility (as noted in the Eligibility Table [N/A]):

☐ Concur
☐ Do Not Concur

Effect (as noted in the Effects Table [N/A]):

☐ No Properties Affected
☐ No Adverse Effect
☐ Conditioned upon the following action(s) (see comments below)
☐ Adverse Effect

Comments:

By:

Jim Danahane
MD State Historic Preservation Office/
Maryland Historical Trust

6/13/19
Date

Return by U.S. Mail or Facsimile to:
Dr. Julie M. Schablitsky, Assistant Division Chief, Environmental Planning Division,
MD State Highway Administration, P.O. Box 717, Baltimore, MD 21203-0717
Telephone: 410-545-8870 and Facsimile: 410-209-5046
A-Proj #9690 Ervin/Manning

Cc: Ervin
Manning

May 28 2019

Ms. Julie Langan
State Historic Preservation Officer
Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Langan:

This letter provides the Virginia Department of Historic Resources (VDHR) with the proposed scope of archaeological investigations in Virginia for the Maryland Department of Transportation State Highway Administration (MDOT SHA) proposed Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS).

As indicated in our May 14, 2019 letter, MDOT SHA's proposed project design in Virginia now extends outside the proposed limits of disturbance of the Virginia Department of Transportation's (VDOT) 495 Express Lanes Northern Extension (NEXT) project in and near the George Washington Memorial Parkway.

In coordination with VDOT and the National Park Service (NPS), MDOT SHA proposes to conduct Phase I and Phase II archaeological investigations within lands administered by the National Park Service in the George Washington Memorial Parkway (GWMP). A map of the proposed MDOT SHA archaeological survey area for the MLS in Virginia is enclosed as **Attachment 1**.

MDOT SHA's archaeology survey area also encompasses proposed project impacts for the VDOT NEXT Project. Potential ramp locations and conduit and signage needs have been identified along the GWMP, and several known archaeological resources and unsurveyed areas are present within the LOD in Virginia. MDOT SHA is coordinating with the National Park Service on an Archaeological Resources Protection Act (ARPA) permit for the proposed survey and evaluation of archaeological resources in the GWMP, which is enclosed as Attachment 2.

Please examine the attached scope of work found within the ARPA permit application (**Attachment 2**). We request your comments by June 28, 2019 on MDOT SHA's proposed scope of archaeological investigations along the GWMP in Virginia.

Please contact MDOT SHA Cultural Resources Team Leader Steve Archer at (410) 545-8508 or via email at sarcher@mdot.maryland.gov with any questions or information needs on this

Ms. Elizabeth Hughes
Page Two

project, or MDOT SHA archaeologist Richard Ervin at (410) 545-2878 or via email at rervin@mdot.maryland.gov for concerns about archaeology.

Sincerely,



Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30142

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Elizabeth Hughes, Maryland State Historic Preservation Officer
Ms. Jeanette Mar, Environmental Manager, FHWA Maryland Division
Mr. Tony Opperman, VDOT
Ms. Sarah Clarke, VDOT
Ms. Lisa B. Choplin, DBIA, I-495 & I-270 P3 Office, MDOT SHA
Mr. Jeffrey Folden, P.E., DBIA, I-495 & I-270 P3 Office, MDOT SHA
Ms. Caryn Brookman, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD

Attachment # 2

May 15, 2019

[illegible]

Resource Types: S (Structure), A (Archaeological Site), HD (Historic District), NHL (National Historic Landmark)
 NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)
 Impact: None, No Adverse, Adverse
 Effect: NPA (No Properties Affected), NAE (No Adverse Effect), AE (Adverse Effect)
Bold rows indicate review action requested



COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Matt Strickler
Secretary of Natural Resources

Julie V. Langan
Director

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www.dhr.virginia.gov

28 June 2019

Ms Julie M. Schablitsky
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Proposed archaeological scope for the I-495 and I-270 Managed Lanes Study
MDOT SHA Study No. AW073A11
DHR File No. 2018-0251

Dear Ms Schablitsky:

The Department of Historic Resources (DHR) has received for our review and comment the Maryland Department of Transportation State Highway Administration's (MDOT SHA) proposed scope for archaeological investigations in Virginia associated with the proposed I-495 and I-270 Managed Lanes Study (MLS). The DHR understands that MDOT SHA proposes additional archaeological survey for portions of the planned limits of disturbance outside areas previously surveyed as part of the I-495 Express Lanes Northern Expansion project within lands administered by the National Park Service George Washington Memorial Parkway unit. The MDOT SHA proposes conducting a Phase I survey across all of the additional impact areas that do not exhibit extensive prior disturbance and Phase II evaluations on five archaeological sites (44FX0374, 44FX0379, 44FX0381, 44FX0389, and 44FX3160). Additionally, Site 44FX0373 will be subjected to close interval Phase I survey within the portion of the site which overlays the proposed limits of disturbance and a 150-foot buffer beyond the limit of disturbance. While DHR has no additional comments on the scope as proposed by MDOT SHA at this time, DHR recommends that MDOT SHA ensure all archaeological investigations be completed to meet or exceed DHR's *Guidelines for Conducting Historic Resources Survey in Virginia* (revised 2017).

If you have any questions about our comments, please contact me at (804) 482-6090.

Sincerely,

Marc Holma, Architectural Historian
Division of Review and Compliance

Administrative Services
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Northern Region Office
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Tel: (540) 868-7029
Fax: (540) 868-7033

C: Ms Sarah Clarke, VDOT
Mr. Tony Opperman, VDOT
Mr. Matt Virta, NPS GWMP
Mr. Bradley Krueger, NPS GWMP



United States Department of the Interior

NATIONAL PARK SERVICE
Greenbelt Park & Baltimore Washington Parkway
6565 Greenbelt Road
Greenbelt, Maryland 20770

IN REPLY REFER TO:
I. A.2. (NCR-NACE)

MAY 29 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Department of Housing and Community Development
100 Community Place
Crownsville, MD 21032

Dear Ms. Hughes:

As part of the I-495 and I-270 Managed Lanes Study Section 106 Process, National Capital Parks-East (NACE), a unit of the National Park Service (NPS), is seeking your preliminary concurrence that Greenbelt Park is potentially eligible for listing on the National Register of Historic Places. NACE recognizes that a Cultural Landscape Inventory will need to be prepared for the park in the near future in order to fulfill its Section 110 obligations of the National Historic Preservation Act of 1966.

Background:

Greenbelt Park was established in 1950 as part of a comprehensive and continuous development of the park system of the national capital region. The park provides high quality camping, picnicking, and hiking in wooded area and along stream corridors, preserving forests, and contributing to the protection of water quality in the Anacostia River watershed. This 1,100-acre park features a 174-site campground, nine (9) miles of trails, and three picnic areas.

The Historic Resources Study¹ done in 2006 for Greenbelt Park recognizes that the Park was initially constructed with funds from the Park Service's Mission 66 program, but did not find any of the building types or small-scale features of exceptional importance and pointed out that there was no established NPS nationwide or regional context at that time by which such construction at Greenbelt Park could be evaluated.²

In 2015, a Multiple Property Documentation (MPD) listing for NPS Mission 66 Era Resources (#65501248) was done to establish that nationwide context that was missing. The MPD notes that NPS Mission 66 resources are located nationwide in the national parks designated through 1972 and includes Greenbelt Park (est. 1950 and from the post- World War II era) as a park that potentially may have Mission 66 resources. The period of significance for Mission 66 era is from 1945-1972. Subsequently, a DRAFT NPS National Capital Region (NCR) Mission 66 MPD Form has added to the context by stating that Greenbelt Park received its initial development from the Mission 66 program, including the construction of the park maintenance building, U.S. Park Police sub-station, and additional parking, while

¹ Robinson & Associates, *Greenbelt Park, National Capital Parks –East, Historic Resources Study (Final)*. Prepared for the National Park Service, National Capital Region, May 31, 2006.

² Ibid, 117.

also pointing out that little additional development has taken place at Greenbelt Park since Mission 66 funding ended.³

Significance Statement:

Though it has not been formally nominated or listed, nor has a determination of eligibility been done, based on the MPD and draft NCR Mission 66 MPDF, the NPS considers Greenbelt Park potentially significant under National Register of Historic Places Criteria A, C, and D due to historic structures associated with the NPS Mission 66 era, cultural landscape, and potentially information-yielding prehistoric and historic archeological resources. Greenbelt Park is significant as a Property Type 3-Public Use District/Facility as the park includes a variety of contributing resources to the Mission 66 program, such as Greenbelt Park - Main Park Road (1961); Greenbelt Park Maintenance Building (ca. 1964); Greenbelt Park USPP Substation D-4 (ca. 1964); Greenbelt Park Picnic Areas (Sweetgum, Laurel, Holly Picnic Areas - ca. 1964); and Greenbelt Park Comfort Stations (ca. 1964).

Greenbelt Park is locally significant under Criterion A as the majority of the park was developed from the Mission 66 program and it fulfilled NCR's goal of providing a variety of recreational opportunities for DC's urban population after WWII. NCR was the main federal agency in the area with authority over substantial natural areas, watersheds, and urban reservations, and it planned and executed its Mission 66 program with an eye toward providing picnic and camping facilities, hiking trails, ball fields, golf courses, a boat center for local high schools and colleges, interpretation of natural and historic resources aimed at schoolchildren, and other facilities for local residents in addition to tourists visiting the nation's capital.

Greenbelt Park is also significant under Criterion C as it typifies the landscape design characteristics of the Mission 66 program, and the only park in the region where almost all of the landscape, roads, campsites, comfort stations, and buildings were constructed during this time. In particular, the campgrounds followed new Mission 66 standards, which included tightly confined developed areas within attractive natural settings, connected by one-way loop roads and hiking trails. Vegetation was also preserved to the greatest extent and the campgrounds featured modern comfort stations. Aside from following the "park service modern" style, the Greenbelt Park USPP Substation (ranger station) was sited at the park's entrance and served as the first official point of contact within the park boundaries for some visitors. Its relatively low profile also 'harmonized' with its setting through horizontality of massing, and color and texture of materials. Finally, the roads and trails were also designed and constructed following Mission 66 design principles including, the use of retaining walls to reduce the height and extent of cut-and-fill slopes, use of vegetation to blend ditches and shoulders to the adjacent landscape was a standard policy, and cut-and-fill slopes were rounded, warped at the end for a natural transition.

Thank you for your attention to this matter and we look forward to receiving your concurrence. Should any questions arise during your review, please do not hesitate to contact Mike Commisso, Acting Chief of Resource Management at (202) 690-5160 or by email at michael_commisso@nps.gov.

Sincerely,



Matthew D. Carroll
Superintendent

³ Robinson & Associates, *Mission 66-Era Visitor Centers, Administration Buildings, and Public Use Areas in the National Capital Region of the National Park Service*, NRHP Multiple Property Documentation Form (DRAFT), 2012.

On Jun 18, 2019, at 3:38 PM, Beth Cole - MHT <beth.cole@maryland.gov> wrote:

Mike,

Thank you for your recent letter providing NPS's views regarding the National Register eligibility of Greenbelt Park. Attached please find the MD SHPO's concurrence with NPS's findings that Greenbelt Park is potentially eligible for the NRHP under Criteria A and C. We have assigned inventory number PG:67-69 to Greenbelt Park and it will now be added to our GIS and inventory records. For purposes of Section 106, we will treat Greenbelt Park as an eligible historic property. We look forward to further coordination with NPS in its further study and documentation of Greenbelt Park. Let me know if you have questions or need further assistance.

Have a good afternoon,

Beth

Beth Cole

Administrator, Project Review and Compliance
Maryland Historical Trust
Maryland Department of Planning

100 Community Place

Crownsville, MD 21032

beth.cole@maryland.gov / 410-697-9541

MHT.Maryland.gov

[Please take our customer service survey](#)

Planning.Maryland.gov / Census.Maryland.gov



On Wed, May 29, 2019 at 5:04 PM Commisso, Michael <michael_commisso@nps.gov> wrote:

Good afternoon Beth,

As we discussed, as part of the I-495 and I-270 Managed Lanes Study Section 106 Process, National Capital Parks-East (NACE), a unit of the National Park Service (NPS), is seeking your preliminary concurrence that Greenbelt Park is potentially eligible for listing on the National Register of Historic Places (see attachment). NACE recognizes that a Cultural Landscape Inventory will need to be prepared for the park in the near future in order to fulfill its Section 110 obligations of the National Historic Preservation Act of 1966.

Let me know if you have any questions or concerns.

Mike

Please note, I am out of the office on detail to National Capital Parks-East. For National Mall and Memorial Parks related issues, please contact Catherine Dewey at (202) 245-4711. Thank you.

Michael Commisso

Acting Chief of Resource Management

National Capital Parks-East

1900 Anacostia Drive SE

Washington, DC 20020

202.690.5160 office

202.494.6905 cell

Cultural Resources Program Manager

National Mall and Memorial Parks

National Park Service

900 Ohio Drive, SW

Washington, DC 20024

<GreenbeltPark MDSHPO 06-18-19.pdf>

June 7, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 8 of the standing structures eligibility determinations associated with the Maryland Department of Transportation State Highway Administration (MDOT SHA) Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that one of the 48 properties evaluated in this submittal is newly eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled for July 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

The Batch 8 submittal also includes the finalized *Suburbanization Historic Context Addendum (1961-1980), Montgomery and Prince George's Counties, Maryland*. A hard copy and digital copy on CD are included for MHT's library.

Ms. Elizabeth Hughes
Page Two

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 8 eligibility determinations by July 8, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@mdot.maryland.gov) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@mdot.maryland.gov) with concerns regarding archaeology.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Schablitsky", with a stylized flourish at the end.

Julie M. Schablitsky
Chief Archaeologist/ADC
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1 (2 pages)

Project Name: I-495 & I-270 MLS - Batch 8

June 7, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-84	Julius West Junior High School (Julius West Middle School)	S	X	Req. 7/2019	2	DOE
M: 26-85	Washington National Pike Industrial Park, Block A	HD	X	Req. 7/2019	2	DOE
M: 29-78	Cabin John Regional Park	HD	X	Req. 7/2019	2	DOE
M: 29-79	Congressional Country Club	HD	NR	Req. 7/2019	2	DOE
M: 32-37	Argyle Local Park	HD	X	Req. 7/2019	2	DOE
M: 35-38	In the Woods	S	-	NR 10/2000	2	Rev. DOE
PG:66-38	Hollywood Addition	HD	X	Req. 7/2019	2	Rev. DOE
PG:66-41	Sunnyside and Sunnyside Knolls	HD	X	Req. 7/2019	2	Rev. DOE
PG:66-69	Hollywood	HD	X	Req. 7/2019	2	Rev. DOE
PG:66-82	Edgewood Knolls	HD	X	Req. 7/2019	2	DOE
PG:66-83	Sunnyside B	HD	X	Req. 7/2019	2	DOE
PG:67-70	Goddard Space Village	HD	X	Req. 7/2019	2	DOE
PG:67-71	Good Luck Estates	HD	X	Req. 7/2019	2	DOE
PG:67-72	Greenbriar Condominiums	HD	X	Req. 7/2019	2	DOE
PG:67-73	Hunting Ridge	HD	X	Req. 7/2019	2	DOE
PG:67-74	Schrom Hills	HD	X	Req. 7/2019	2	DOE
PG:69-70	Carrollan	HD	X	Req. 7/2019	2	DOE
PG:69-71	Princess Springs	HD	X	Req. 7/2019	2	DOE
PG:72-78	Washington Suburban Sanitary Commission (WSSC) Central Avenue Water Pumping Station	S	X	Req. 7/2019	2	DOE
PG:76A-61	Andrews Village	HD	X	Req. 7/2019	2	DOE
PG:76A-62	Forest Village Apartments	HD	X	Req. 7/2019	2	DOE
PG:76B-76	Allentowne Apartments	HD	X	Req. 7/2019	2	DOE
PG:76B-77	Andrews Manor	HD	X	Req. 7/2019	2	DOE
PG:76B-78	Andrews Manor Apartments	HD	X	Req. 7/2019	2	DOE

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
PG:76B-79	Andrews Manor Shopping Center	HD	X	Req. 7/2019	2	DOE
-	4305 Forestville Road	S	X	Req. 7/2019	2	Short
-	5401 Florist Place	S	X	Req. 7/2019	2	Short
-	Chevy Chase Recreation Association	S	X	Req. 7/2019	2	Short
-	Ephesians New Testament Church	S	X	Req. 7/2019	2	Short
-	Herc Rentals	S	X	Req. 7/2019	2	Short
-	Holy Cross Lutheran Church	S	X	Req. 7/2019	2	Short
-	Joint Base Andrews Water Tower	S	X	Req. 7/2019	2	Short
-	Kingdom Square	S	X	Req. 7/2019	2	Short
-	Morris Park	S	X	Req. 7/2019	2	Short
-	North Chevy Chase Local Park	S	X	Req. 7/2019	2	Short
-	Peterbilt	S	X	Req. 7/2019	2	Short
-	Ryder Truck Rental & Leasing	S	X	Req. 7/2019	2	Short
-	U-Haul Moving & Storage of Landover	S	X	Req. 7/2019	2	Short
-	Warehouse, 5000-5060 Beech Place	S	X	Req. 7/2019	2	Short
-	Warehouses, 8901-8961 D'Arcy Road	S	X	Req. 7/2019	2	Short
-	Whitfield Chapel Park	S	X	Req. 7/2019	2	Short
M: 20-15	Gaither-Howes House	S	X	Req. 7/2019	2	Addendum
M: 20-24	Mills House	S	X	Req. 7/2019	2	Addendum
M: 26-6	Poor Farm, Site and Cemetery	S	X	Req. 7/2019	2	Addendum
M: 36-36	Louis C. & Charlotte E. Dismer Property	S	X	Req. 7/2019	2	Addendum
PG:76A-25	L and R Lawnmower	S	X	Req. 7/2019	2	Addendum
PG:76A-26	Helen Knox House	S	X	Req. 7/2019	2	Addendum
PG:77-60	Hazard Storage (AAFB Building #1990)	S	X	Req. 7/2019	2	Addendum

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

August 8, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 8”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 41 DOE forms represents the eight batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following property is eligible for listing in the National Register:

MIHP No. M: 29-79 Congressional Country Club

This property is National Register-eligible under Criteria A and C for its association with the development of 20th century country clubs and the role of this club as a gathering place for the political and business elite of Washington, D.C. The property is also significant for the design of its distinctive clubhouse.

The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

MIHP No. M: 26-84 Julius West Junior High School (Julius West Middle School)

MIHP No. M: 26-85 Washington National Pike Industrial Park, Block A

MIHP No. M: 29-78 Cabin John Regional Park

MIHP No. M: 32-37 Argyle Local Park

MIHP No. PG:66-38 Hollywood Addition

MIHP No. PG:66-41 Sunnyside and Sunnyside Knolls

MIHP No. PG:66-69 Hollywood

MIHP No. PG:66-82 Edgewood Knolls

MIHP No. PG:66-83 Sunnyside B

MIHP No. PG:67-70 Goddard Space Village

MIHP No. PG:67-71 Good Luck Estates

MIHP No. PG:67-72 Greenbrier Condominiums

MIHP No. PG:67-73 Hunting Ridge
MIHP No. PG:67-74 Schrom Hills
MIHP No. PG:69-70 Carrollan
MIHP No. PG:69-71 Princess Springs
MIHP No. PG:72-78 WSSC Central Avenue Water Pumping Station
MIHP No. PG:76A-61 Andrews Village
MIHP No. PG:76A-62 Forest Village Apartments
MIHP No. PG:76B-76 Allentowne Apartments
MIHP No. PG:76B-77 Andrews Manor
MIHP No. PG:76B-78 Andrews Manor Apartments
MIHP No. PG:76B-79 Andrews Manor Shopping Center
4305 Forestville Road
5401 Florist Place
Chevy Chase Recreation Association
Ephesians New Testament Church
Herc Rentals
Holy Cross Lutheran Church
Joint Base Andrews Water Tower
Kingdom Square
Morris Park
North Chevy Chase Local Park
Peterbilt
Ryder Truck Rental & Leasing
U-Haul Moving & Storage of Landover
Warehouse, 5000-5060 Beech Place
Warehouses, 8901-8961 D'Arcy Road
Whitfield Chapel Park

The property known as In the Woods (MIHP No. M: 35-38) was previously evaluated and determined eligible for listing in the National Register in 2000. As part of the current study, MDOT SHA revisited the property to update its National Register boundary, period of significance and character-defining features. We concur with the revised documentation and historic boundary for this resource.

Finally, we acknowledge receipt of the final revised draft of the following report: Suburbanization Historic Context Addendum (1961-1980) (MDOT SHA 2019). This report has been accessioned into our library.

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer
EH/BC/TJT/201902893

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

July 8, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 9 of the standing structures eligibility determinations associated with the Maryland Department of Transportation State Highway Administration (MDOT SHA) Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that one of the 50 properties included in this submittal is newly eligible for the National Register of Historic Places (NRHP). Two other properties are eligible: the Glenarden Historic District (PG:72-26/PG:73-26) and the Philip F. Gormley House/Gagarin Property (M: 35-162). The Glenarden Historic District is a revised and expanded version of the Town of Glenarden Determination of Eligibility (DOE) form MDOT SHA submitted to MHT as part of Batch 2. New information based on additional survey and ongoing research in the area has resulted in an expansion of the previous boundary. MHT holds an easement on the Philip F. Gormley House/Gagarin Property, but the property had not been formally evaluated for the NRHP using MHT's DOE form.

MDOT SHA provided a review draft of the DOE form for the U.S. Postal Service (USPS) Southern Maryland Processing and Distribution Center to Mr. Daniel Delahaye, Federal Preservation Officer for the USPS. The included form for that facility reflects input from the USPS.

Also included is a Maryland Inventory of Historic Properties form for the Marriott International Corporate Headquarters in Bethesda. This form replaces the DOE form submitted to MHT as part of Batch 2.

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the

Ms. Elizabeth Hughes
Page Two

final batch submittal, anticipated in September 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 9 eligibility determinations by August 7, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@mdot.maryland.gov) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@mdot.maryland.gov) with concerns regarding archaeology.

Sincerely,



Digitally signed by
Steve Archer
Adobe Acrobat
version:
2017.011.30143

for Julie M. Schablitsky
Chief Archaeologist/Assistant Division Chief
Environmental Planning Division

Attachments

cc:

Ms. Jeanette Mar, FHWA
Mr. Daniel Delahaye, USPS
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1 (2 pages)

Project Name: I-495 & I-270 MLS - Batch 9

July 8, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-86	Potomac Valley Nursing Home (Potomac Valley Nursing and Wellness Center)	S	X	Req. 8/2019	2	DOE
M: 29-80	Cabin John Stream Valley Park	HD	X	Req. 8/2019	2	DOE
M: 29-81	Montgomery Country Club (Bethesda Country Club)	HD	X	Req. 8/2019	2	DOE
M: 33-36	Hillandale Swim and Tennis Association	S	X	Req. 8/2019	2	DOE
M: 33-37	Xaverian College (National Labor College)	HD	X	Req. 8/2019	2	DOE
M: 35-162	Philip F. Gormley House/Gagarin Property	S	NR	Req. 8/2019	2	DOE
M: 35-209	Old Georgetown Club	S	X	Req. 8/2019	2	DOE
PG:61-86	Powder Mill Elementary School (Frances Fuchs Early Childhood Center)	S	X	Req. 8/2019	2	DOE
PG:72-26 PG:73-26	Glenarden Historic District	HD	NR	Req. 8/2019	2	Rev. DOE
PG:72-79	Centennial Village	HD	X	Req. 8/2019	2	DOE
PG:72-80	Hanson-Beltway Industrial Center	HD	X	Req. 8/2019	2	DOE
PG:73-36	Carsondale	HD	NR	Req. 8/2019	2	DOE
PG:73-37	Cranmore Knolls	HD	X	Req. 8/2019	2	DOE
PG:73-38	Rambling Hills	HD	X	Req. 8/2019	2	DOE
PG:75A-78	USPS Southern Maryland Processing and Distribution Center	HD	X	Req. 8/2019	2	DOE
PG:75A-79	Badini's Addition to Ole Longfield	HD	X	Req. 8/2019	2	DOE
PG:76A-63	Andrews Park	HD	X	Req. 8/2019	2	DOE
PG:76A-64	Silver Valley	HD	X	Req. 8/2019	2	DOE
PG:76B-80	Old Branch Avenue Houses	HD	X	Req. 8/2019	2	DOE
PG:76B-81	Princeton	HD	X	Req. 8/2019	2	DOE
PG:76B-82	Temple Terrace	HD	X	Req. 8/2019	2	DOE
PG:76B-83	Woodlane	HD	X	Req. 8/2019	2	DOE
PG:76B-84	Yorkshire Village	HD	X	Req. 8/2019	2	DOE

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
	3220 Park View Road	S	X	Req. 8/2019	2	Short
	3231 Park View Road	S	X	Req. 8/2019	2	Short
	3724 Brightseat Road	S	X	Req. 8/2019	2	Short
	3900 Penn Belt Place	S	X	Req. 8/2019	2	Short
	4704 Medley Drive	S	X	Req. 8/2019	2	Short
	5612 Lanham Station Road	S	X	Req. 8/2019	2	Short
	8803 Ardwick Ardmore Road	S	X	Req. 8/2019	2	Short
	8808 Spring Avenue	S	X	Req. 8/2019	2	Short
	8819 Saunders Lane	S	X	Req. 8/2019	2	Short
	8820 Saunders Lane	S	X	Req. 8/2019	2	Short
	8904 Ardmore Road	S	X	Req. 8/2019	2	Short
	9017 Spring Hill Lane	S	X	Req. 8/2019	2	Short
	10020 Riggs Road	S	X	Req. 8/2019	2	Short
	The Classics	S	X	Req. 8/2019	2	Short
	Ebenezer United Methodist Church	S	X	Req. 8/2019	2	Short
	Episcopal Church of the Nativity	S	X	Req. 8/2019	2	Short
	Landover Center	S	X	Req. 8/2019	2	Short
	Lanham Sports Park	S	X	Req. 8/2019	2	Short
	McDonald Field	S	X	Req. 8/2019	2	Short
	Malcolm King Park	S	X	Req. 8/2019	2	Short
	Silver Cab of P.G. & Taxi Taxi Dispatch Center	S	X	Req. 8/2019	2	Short
	Snapbox Self-Storage	S	X	Req. 8/2019	2	Short
	Waste Management - Temple Hills	S	X	Req. 8/2019	2	Short
M: 29-59	Carderock Springs Historic District	HD	-	11/2008 NRL	2	Addendum
M: 31-7	Capitol View Park Historic District	HD	-	4/2001 NR	2	Addendum
PG:76A-33	Warren Ammann House	HD	ND	Req. 8/2019	2	Addendum
M: 30-40	Marriott International Corporate Headquarters	S	ND	Req. 8/2019	2	MIHP

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Secretary
Sandy Schrader, Deputy Secretary

August 12, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 9”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 47 DOE forms represents the ninth batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following property is eligible for listing in the National Register:

MIHP No. 73-36 Carsondale
This historic district eligible for the National Register of Historic Places under Criterion A as one of the earliest suburban developments advertised for African American WWII veterans.

The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

MIHP No. M:26-86 Potomac Valley Nursing Home (Potomac Valley Nursing and Wellness Center)
MIHP No. M: 29-81 Montgomery Country Club (Bethesda Country Club)
MIHP No. M: 33-36 Hillandale Swim and Tennis Association
MIHP No. M: 33-37 Xaverian College (National Labor College)
MIHP No. M: 35-209 Old Georgetown Club
MIHP No. PG:61-86 Powder Mill Elementary School (Frances Fuchs Early Childhood Center)
MIHP No. PG:72-79 Centennial Village
MIHP No. PG:72-80 Hanson-Beltway Industrial Center
MIHP No. PG:73-37 Cranmore Knolls
MIHP No. PG:73-38 Rambling Hills
MIHP No. PG:75A-78 USPS Southern MD Processing & Distribution Center
MIHP No. PG:75A-79 Badini’s Addition to Ole Longfield
MIHP No. PG:76A-63 Andrews Park
MIHP No. PG:76A-64 Siler Valley
MIHP No. PG:76B-80 Old Branch Avenue Houses
MIHP No. PG:76B-81 Princeton

MIHP No. PG:76B-82 Temple Terrace
MIHP No. PG:76B-83 Woodlane
MIHP No. PG:76B-84 Yorkshire Village
3220 Park View Road
3231 Park View Road
3724 Brightseat Road
3900 Penn Belt Place
4704 Medley Drive
5612 Lanham Station Road
8803 Ardwick Ardmore Road
8808 Spring Avenue
8819 Saunders Lane
8820 Saunders Lane
8904 Ardmore Road
9017 Spring Hill Lane
10020 Riggs Road
The Classics, 4591 Allentown Road
Ebenezer United Methodist Church, 4912 Whitfield Chapel Road
Episcopal Church of the Nativity, 5203 Manchester Drive
Landover Center, 1701 Brightseat Road
Lanham Sports Park, 7700 Good Luck Road
McDonald Field, 13 Southway
Malcolm King Park, 1200 West Side Drive
Silver Cab of P.G. & Taxi Taxi Dispatch Center, 8316 Ardwick Ardmore Road
Snapbox Self-Storage, 5061 Beech Place
Waste Management – Temple Hills, 4900 Beech Place

The property known as the Town of Glenarden (MIHP Nos. PG:72-26/73-26) was previously evaluated and determined eligible for listing in the National Register in 2018. Ongoing research conducted as part of this study has resulted in an expansion of the previously identified historic boundary. We concur with the revised documentation and historic boundary for the property now known as the Glenarden Historic District.

The Trust holds a perpetual preservation easement on the Philip F Gormley House/Gagarin Property (MIHP No. PG:35-162), however, a formal DOE was never completed. We appreciate MDOT SHA's preparation of a DOE for this resource and agree that it is National Register eligible.

The Trust agrees that the Cabin John Stream Valley Park (MIHP No. M: 29-80) is not eligible for listing in the National Register based on the existing analysis presented in MDOT SHA's DOE form. The property is a late example of park creation in the region and possesses minimal manmade improvements. However, we welcome future efforts to develop a comprehensive context or multiple property documentation of the Stream Valley Park system that could result in a re-evaluation of this property.

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes

Director/State Historic Preservation Officer

EH/BC/TJT/201903398

cc:

Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

November 26, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville, MD 21032-2023

Ms. Julie Langan
State Historic Preservation Officer
Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Hughes and Ms. Langan:

This letter serves to inform the Maryland Historical Trust (MHT) and the Virginia Department of Historic Resources (VDHR) of an update to the Area of Potential Effects (APE) and the completion of Batch 10 of the standing structures eligibility determinations associated with the Maryland Department of Transportation State Highway Administration (MDOT SHA) Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway) in Maryland, connecting into Virginia's portion of I-495, as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

MDOT SHA initially defined the APE in a letter to MHT dated April 16, 2018. In the absence of engineered alternatives, the APE at the time was established using a Corridor Study Boundary (CSB) as the initial survey boundary. The CSB, a 300-foot-wide area along the centerline of I-495 and I-270 within the project limits, was the area in which it was assumed physical impacts would occur. The APE extended an additional 250 feet along either side of the CSB and was entirely within Maryland. MHT accepted MDOT SHA's definition of the APE on May 17, 2018 (MHT Log 201802131).

On May 14, 2019, MDOT SHA submitted an updated APE for the I-495 & I-270 MLS encompassing parts of the Virginia Department of Transportation's 495 Express Lanes Northern Extension (NEXT) study in the vicinity of the American Legion Bridge. MHT accepted the updated APE definition on June 13, 2019 (MHT Log 201902528).

MDOT SHA received comments from the National Park Service and VDHR requesting clarification of visual effects considerations regarding the APE in the vicinity of the American Legion Bridge spanning Maryland and Virginia over the Potomac River. MDOT SHA notes that sizable historic properties are present at both landings of the bridge (George Washington Memorial Parkway in Virginia and The Chesapeake and Ohio Canal National Historical Park in Maryland). MDOT SHA will consider effects to these resources in their entirety. MDOT SHA believes the 250-foot buffer is consistent with the consideration to effects to viewshed, setting and feeling given to all other historic properties for the study and does not merit special extension in this area. As with all other historic properties, MDOT SHA considers effects to the property in total even if only a portion of the property falls within the APE. However, because the limits of disturbance (LOD) have expanded at the American Legion Bridge, the APE is accordingly shown 250 feet from the edge of LOD, resulting in a minor APE expansion within the Potomac River.

Since the APE update in May 2019, following design advancement and the establishment of engineered alternatives, MDOT SHA has developed LOD for the alternatives under consideration. Refinements to the LOD have resulted in an expanded APE in Maryland. MDOT SHA has revised the APE using the LOD for Alternative 10, which represents the broadest alternative for physical construction impacts. In general, the LOD is narrower than the CSB and is a more accurate estimation of project impacts. However, where the LOD is smaller than the CSB, the APE continues to use the larger limits of the CSB. Where the LOD extends beyond the CSB, the APE has expanded. As it did with the CSB, the APE extends 250 feet on either side of the Alternative 10 LOD. Within Virginia, particularly along the west side of I-495, the APE has a reduced buffer from the LOD in some areas for consistency with VDOT's NEXT project, taking into account the presence of noise barriers and where engineering design has been more refined. The APE within Virginia is unchanged from the May 2019 submittal.

Please see Attachment 2 for a list of the properties included in the Batch 10 submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that 2 of the 46 properties evaluated in this submittal, Capitol Car Distributors (PG:70-95) and Little Washington (PG:78-39), are eligible for the National Register of Historic Places (NRHP). Oakview (M: 37-15), which MDOT SHA originally submitted as an Addendum form with Batch 6, is included on a Determination of Eligibility (DOE) form at MHT's request to facilitate concurrence with the neighborhood's expanded boundaries.


Also included is a revised Addendum form for Carderock Springs (M: 29-59), which corrects a mapping error on the version submitted to MHT as part of Batch 9.

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. Following this submittal, MDOT SHA will provide MHT with an Access database that includes all properties evaluated for the I-495 & I-270 MLS through Batch 10.

Ms. Elizabeth Hughes
Page Three

Please examine the attached APE Map (Attachment 1), Eligibility Table (Attachment 2), and batch submittal (Attachment 3). We request comments from MHT and VDHR by December 26, 2019, on MDOT SHA's revised APE. By the same date, we request MHT concurrence with MDOT SHA's Batch 10 eligibility determinations. Please contact Matt Manning at 410-545-8560 (or via email at MManning@mdot.maryland.gov) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@mdot.maryland.gov) with concerns regarding archaeology.

Sincerely,

 Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30152

for Julie M. Schablitsky
Chief Archaeologist/Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, Environmental Manager, FHWA Maryland Division
Mr. John Simkins, FHWA Virginia Division
Mr. Tony Opperman, VDOT
Ms. Sarah Clarke, VDOT
Ms. Lisa B. Choplin, DBIA, Director, I-495 & I-270 P3 Office, MDOT SHA
Mr. Jeffrey Folden, P.E., DBIA, Deputy Director, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #2 (2 pages)

Project Name: I-495 & I-270 MLS - Batch 10

November 26, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 21-285	The Willows	HD	X	Req. 12/2019	3	DOE
M: 26-87	Fallsmead	HD	X	Req. 12/2019	3	DOE
M: 30-55	Martin Marietta Corporation Headquarters	S	X	Req. 12/2019	3	DOE
M: 31-80	Forest Grove Elementary School	S	X	Req. 12/2019	3	DOE
M: 32-38	Indian Spring Park	HD	X	Req. 12/2019	3	DOE
M: 35-210	Wyngate	HD	X	Req. 12/2019	3	DOE
M: 36-97	The Valley	HD	X	Req. 12/2019	3	DOE
M: 36-98	Woodside Forest	HD	X	Req. 12/2019	3	DOE
M: 36-99	Technical Service Park	S	X	Req. 12/2019	3	DOE
M: 37-15	Oakview (Batch 6 Addendum Revised to DOE)	HD	X	Req. 12/2019	3	DOE
PG:67-75	Lakecrest	HD	X	Req. 12/2019	3	DOE
PG:70-95	Capitol Car Distributors	S	NR	Req. 12/2019	3	DOE
PG:73-39	Spring Dale	HD	X	Req. 12/2019	3	DOE
PG:76B-85	Abbott Forest	HD	X	Req. 12/2019	3	DOE
PG:76B-86	Glenn-Hills	HD	X	Req. 12/2019	3	DOE
PG:76B-87	Manchester Estates	HD	X	Req. 12/2019	3	DOE
PG:78-39	Little Washington	HD	NR	Req. 12/2019	3	DOE
	223 University Boulevard	S	X	Req. 12/2019	3	Short
	1509 Forest Glen Road	S	X	Req. 12/2019	3	Short
	2410-26 Linden Lane	S	X	Req. 12/2019	3	Short
	5502 Old Branch Avenue	S	X	Req. 12/2019	3	Short
	6001 Auth Road	S	X	Req. 12/2019	3	Short
	6302 Princess Garden Parkway	S	X	Req. 12/2019	3	Short
	6314 Princess Garden Parkway	S	X	Req. 12/2019	3	Short
	6712 McKeldin Drive	S	X	Req. 12/2019	3	Short
	7100 Heatherhill Road	S	X	Req. 12/2019	3	Short
	7104 Heatherhill Road	S	X	Req. 12/2019	3	Short

Codes:

Resource Types: S (Structure), A (Archaeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
	7124 Greentree Road	S	X	Req. 12/2019	3	Short
	7601 Good Luck Road	S	X	Req. 12/2019	3	Short
	9001 Annapolis Road	S	X	Req. 12/2019	3	Short
	9001 Ardmore Road	S	X	Req. 12/2019	3	Short
	9011 Annapolis Road	S	X	Req. 12/2019	3	Short
	9075 Comprint Court	S	X	Req. 12/2019	3	Short
	Douglass E. Patterson Park	S	X	Req. 12/2019	3	Short
	Episcopal Church of Our Saviour	S	X	Req. 12/2019	3	Short
	Forestville Asphalt	S	X	Req. 12/2019	3	Short
	Grace Presbyterian Church	S	X	Req. 12/2019	3	Short
	James E. Duckworth School	S	X	Req. 12/2019	3	Short
	Knights of Columbus Prince George's Council	S	X	Req. 12/2019	3	Short
	Morningside Shell Service Station	S	X	Req. 12/2019	3	Short
	Museum Warehouse, Building 178, Forest Glen Annex	S	X	Req. 12/2019	3	Short
	Shell Gas and Service Station (Gaithersburg)	S	X	Req. 12/2019	3	Short
	Shell Gas and Service Station (Rockville)	S	X	Req. 12/2019	3	Short
	Shell Service Station and Strip Center	S	X	Req. 12/2019	3	Short
	Sheraton Potomac Inn	S	X	Req. 12/2019	3	Short
	Steuart Ford	S	X	Req. 12/2019	3	Short
M: 29-59	Carderock Springs Historic District (8124 Stone Trail Drive)	HD	-	11/2008 NRL	3	Addendum

Codes:

Resource Types: S (Structure), A (Archaeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested



COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Matt Strickler
Secretary of Natural Resources

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

23 December 2019

Ms Julie M. Schablitsky
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Update on APE and Batch 10 architectural properties for the I-495 and I-270
Managed Lanes Study
MDOT SHA Study No. AW073A11
DHR File No. 2018-0251

Dear Ms Schablitsky:

The Department of Historic Resources (DHR) has received your letter of 26 November 2019 regarding the above referenced project. The correspondence from the Maryland Department of Transportation State Highway Administration (MDOT SHA) is, in part, a response to DHR's letter of 10 June 2019 commenting on the revised Area of Potential Effects (APE) for the proposed I-495 and I-270 Managed Lanes Study (MLS). Specifically, we informed MDOT SHA that the National Park Service unit at George Washington Memorial Parkway (NPS GWMP) expressed to DHR that the revised APE did not take into consideration possible visual impacts caused by an estimated 14 acres of vegetative and tree clearing associated with the undertaking and temporary construction access. In our letter, we requested MDOT SHA address NPS GWMP's concerns concerning this topic.

As stated in MDOT SHA's letter of 26 November, it believes the 250-foot buffer extended along either side of the Corridor Study Boundary "is consistent with the consideration to effects to viewshed, setting, and feeling given to all other historic properties for the study and does not merit special extension" in the area of the George

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Washington Memorial Parkway. However, because the limits of disturbance (LOD) have expanded in the area of the American Legion Bridge the 250-foot buffer has expanded some as well. Additionally, MDOT SHA stated it is the agency's policy to "consider effects to the property in total even if only a portion of the property falls within the APE." With the knowledge that MDOT SHA has expanded the indirect APE in response to the larger LOD near the American Legion Bridge, and the fact it will assess the project effects along all of the George Washington Memorial Parkway, not just those portions within the APE, DHR has greater confidence in MDOT SHA's definition of the APE. Please note, however, that as part of the effect analysis DHR anticipates MDOT SHA to prepare visual simulations depicting the undertaking as seen at various points along the George Washington Memorial Parkway, to include locations outside the established APE.

With respect to the Batch 10 standing structures eligibility determinations, the properties covered in this submission fall entirely in Maryland and, therefore, are outside of DHR's purview. We have no comment on Batch 10.

If you have any questions about our comments, please contact me at (804) 482-6090.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Holma", written in a cursive style.

Marc Holma, Architectural Historian
Division of Review and Compliance

C: Mr. John Simkins, FHWA Virginia Division
Ms Sarah Clarke, VDOT
Mr. Tony Opperman, VDOT
Mr. Matt Virta, NPS GWMP
Ms Maureen Joseph, NPS GWMP



Maryland DEPARTMENT OF PLANNING MARYLAND HISTORICAL TRUST

December 30, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 10”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

The Maryland Department of Transportation State Highway Administration (MDOT SHA) defined in the undertaking’s original Area of Potential Effects (APE) in April 2018 and updated the APE in May 2019. Based on ongoing design development, the APE has been expanded within Maryland. The Trust agrees with the MDOT SHA’s current redefined APE.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group, RK&K LLP and the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 46 DOE forms represents the tenth batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following properties are eligible for listing in the National Register:

- MIHP No. PG:70-95 Capitol Car Distributors
This property is eligible for the National Register under Criterion C as an example of a New Formalist corporate office building of the 1960s.
- MIHP No. PG:78-39 Little Washington
This historic district is eligible for the National Register under Criterion A as an example of a mid-20th century auto-dependent African American subdivision from segregation-era Maryland.
- MIHP No. M: 29-59 Carderock Springs Historic District
The Trust agrees that the dwelling located at 8214 Stone View Trail Drive contributes to the historic significance of the National Register-listed Carderock Springs Historic District.

The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

- MIHP No. M: 21-285 The Willows
- MIHP No. M: 26-87 Fallsmead
- MIHP No. M: 30-55 Martin Marietta Corporation Headquarters

MIHP No. M: 31-80 Forest Grove Elementary School
MIHP No. M: 32-38 Indian Spring Park
MIHP No. M: 35-210 Wyngate
MIHP No. M: 36-97 The Valley
MIHP No. M: 36-98 Woodside Forest
MIHP No. M: 36-99 Technical Service Park
MIHP No. PG:67-75 Lakecrest
MIHP No. PG:73-39 Spring Dale
MIHP No. PG:76B-85 Abbott Forest
MIHP No. PG:76B-86 Glenn-Hills
MIHP No. PG:76B-87 Manchester Estates
223 University Boulevard East
1509 Forest Glen Road
2410-2426 Linden Lane
5502 Old Branch Avenue
6001 Auth Road
6302 Princess Garden Parkway
6314 Princess Garden Parkway
6712 McKeldin Drive
7100 Heatherhill Road
7104 Heatherhill Road
7124 Greentree Road
7601 Good Luck Road
9001 Annapolis Road
9001 Ardmore Road
9011 Ardmore Road
9075 Comprint Court
Douglass E. Patterson Park, 7001 Marianne Drive
Episcopal Church of Our Saviour, 1700 Powder Mill Road
Forestville Asphalt, 8700 D'Arcy Road
Grace Presbyterian Church, 5924 Princess Garden Parkway
James E. Duckworth School, 11201 Evans Trail
Knights of Columbus Prince George's Council, 9450 Cherry Hill Road
Morningside Shell Service Station, 6815 Suitland Road
Museum Warehouse, Building 178, Forest Glen Annex, Linden Lane at Smith Drive
Shell Gas and Service Station, 15730 Shady Grove Road
Shell Gas and Service Station, 1250 W. Montgomery Avenue
Shell Service Station and Strip Center, 10201-10203 New Hampshire Avenue
Sheraton Potomac Inn, 3 Research Court
Steuart Ford, 9020 Lanham Severn Road

The property known as Oakview (MIHP No. M: 37-15) was evaluated and determined not eligible for listing in the National Register in 2000. Ongoing research conducted as part of this study has resulted in an expansion of the previously documented resource to include additional associated residential buildings and amenities. The Trust accepts the revised documentation and boundary for the Oakview community, and we agree that it remains ineligible for listing in the National Register.

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer
EH/BC/TJT/201905523

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)



COMMONWEALTH of VIRGINIA

Department of Historic Resources

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Secretary of Natural Resources

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14 February 2020

Ms Julie M. Schablitsky
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Archaeological survey for the I-495 and I-270 Managed Lanes Study
MDOT SHA Study No. AW073A11
DHR File No. 2018-0251

Dear Ms Schablitsky:

The Department of Historic Resources (DHR) has received for our review and comment the report "Cultural Resources Technical Report, Volume 6: Phase I Archaeological Survey, Intensive Phase I Archaeological Survey of Site 44FX0373, and Phase II Archaeological Evaluation of Sites 44FX0374, 44FX0379, 44FX0381, 44FX0389, 44FX3160, and 44FX3900 within the George Washington Memorial Parkway for the I-495/I-270 Managed Lanes Study (Maryland Department of Transportation), Fairfax County, Virginia" (December 2019) prepared by TRC Environmental Corporation. We provide our comments to the Federal Highway Administration (FHWA) and Maryland Department of Transportation as assistance in meeting its responsibilities under Section 106 of the National Historic Preservation Act.

The investigations and report generally meet applicable standards and guidelines and DHR accepts the report as a reasonable and good faith effort to identify historic properties. The report documents Phase I survey efforts of previously unsurveyed portions of the project's limits of disturbance. The Phase I survey within the vicinity of sites 44FX0322 and 44FX0326 encountered no cultural materials. The Phase I survey expanded the boundary of site 44FX0377 but encountered a low density of non-diagnostic lithic artifacts within the limits of disturbance. The consultant investigated a portion of site 44FX0373 within the limits of disturbance for the project at Phase I "intensive" level. The consultant evaluated six (6) sites at a Phase II level within the project limits of disturbance. The report's findings recommend sites 44FX0322, 44FX0326, and 44FX0377 remain unevaluated for their National Register of Historic Places

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(NRHP) eligibility but no further work is necessary the vicinity of sites 44FX0322, 44FX0326, and 44FX0377. The consultant recommends sites 44FX0374 and 44FX0379 eligible for listing on the NRHP. The consultant further recommends sites 44FX0381, 44FX0389, 44FX3160 and 44FX3900 are not individually eligible for listing on the NRHP. The consultant believes additional Phase II testing would be necessary to assess NRHP eligibility of site 44FX0373, but that the portion of the site within the planned limits of disturbance does not contribute to the site's overall eligibility. Finally, the report concludes that a majority of the sites (44FX0373, 44FX0374, 44FX0379, 44FX0381, and 44FX0389), as well as three (3) sites not included in this investigation (44FX0380, 44FX0390, and 44FX0227) should be listed as the "Dead Run Ridges Archaeological District" with all the aforementioned sites would contribute to the overall eligibility of the district.

The DHR project review archaeologist presented report and its recommendations to the archaeological subcommittee of our department's National Register Evaluation Committee on 7 February 2020. Based on the information provided, the committee concurs that sites 44FX0374 and 44FX0379 are eligible for listing on the NRHP under Criterion D. The committee does not agree, however, that sites 44FX0381 and 44FX0389 are not eligible and recommends both sites as individually eligible for listing on the NRHP under Criterion D. Both sites exhibit similar horizontal and vertical integrity as well as a similar level of research potential as do sites 44FX0374 and 44FX0379. The committee noted Site 44FX0381 as having a greater diversity of stone tools and distinctly Late Woodland period diagnostic artifacts, making it a notable outlier from the surrounding Late Archaic to Early Woodland period sites with potential to improve our understanding of the Late Woodland occupation of the area. The committee concurs sites 44FX3160 and 44FX3900 are not eligible for listing on the NRHP. The committee also agrees the portion of site 44FX0373 within the study area does not contribute to the site's overall potential eligibility for listing on the NRHP. Additionally, DHR concurs sites 44FX0322, 44FX0326, and 44FX0377 should remain unevaluated for NRHP eligibility and no further archaeological investigation is necessary in the project's limits of disturbance for these sites.

Finally, regarding the proposed "Dead Run Ridges Archaeological District," the committee does not endorse the recommendation to list sites 44FX0373, 44FX0374, 44FX0379, 44FX0381, 44FX0389, 44FX0380, 44FX0390, and 44FX0227 as an archaeological district. Based on the information provided, it is DHR's opinion that listing the area as an archaeological district is not appropriate at this time. The boundary for the proposed district appears arbitrarily defined by the limits of the current investigation rather than unique cultural or topographic features related to the Early Archaic through Late Woodland period use of the landscape. While DHR agrees the identified sites are analogous with one another and represent lithic and resource extraction activities along the ridges above the Potomac River, other sites characterized by similar temporal and functional affiliations extend well beyond the boundaries of the proposed district along a large portion of the Potomac. The consultant even notes that the scope of the investigation has limited the definition of the district boundaries and that "While it is beyond the scope of this investigation to consider inclusion within the District of other, nearby archaeological resources...further research may refine the proposed District boundaries or define additional archaeological districts" (Page 171). Additional research and investigations throughout the

surrounding areas may lead to a potential archaeological district focused on Archaic and Woodland period quartz extraction along the Potomac River in this topographic region, but further analysis is necessary to understand the extent of these activities throughout the region.

However, DHR acknowledges the value of considering a landscape based approach to understanding these related sites with the study area. Mitigation and potential data recovery approaches that consider the relationships between and significance of these sites from a landscape perspective may be of value for this project.

If you have any questions about our comments, please contact me at (804) 482-6090.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marc Holma', written over the word 'Sincerely,'.

Marc Holma, Architectural Historian
Division of Review and Compliance

C: Ms Sarah Clarke, VDOT
Mr. William Moore, VDOT
Mr. Tony Opperman, VDOT
Ms Maureen Joseph, NPS GWMP
Mr. Matt Virta, NPS GWMP
Mr. Bradley Krueger, NPS GWMP
Mr. John Simkins, FHWA
Mr. Steven Archer, MDOT



Maryland DEPARTMENT OF PLANNING MARYLAND HISTORICAL TRUST

March 12, 2020

Dr. Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division
MDOT State Highway Administration
P.O. Box 717
Baltimore, MD 21203-0717

Re: I-495 & I-270 Managed Lanes Study (MLS)
Montgomery and Prince George's Counties, Maryland
MDOT SHA Project No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust) with the six-volume *Cultural Resources Technical Report* for the above-referenced project. The Maryland Department of Transportation State Highway Administration's (MDOT SHA) submittal represents ongoing consultation to assess the project's effects on historic properties, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the Maryland Historical Trust Act of 1985, as amended, State Finance and Procurement Article §§ 5A-325 and 5A-326 of the Annotated Code of Maryland. Trust staff have conducted a thorough review of the materials and we are writing to provide our comments and concurrence below and in an attachment to this letter.

Architectural Historic Properties Comments for Maryland Sections of the Area of Potential Effects (APE): MDOT SHA's extensive efforts to identify historic properties produced the well-written and effective *Suburbanization Historic Context Addendum (1961-1980), Montgomery and Prince George's Counties* (May 2019) and resulted in the survey and evaluation of 329 resources within the built environment. A total of 51 historic properties listed in or determined eligible for the National Register of Historic Properties were identified within the undertaking's APE, as noted in Table 2.2 of *Cultural Resources Technical Report Volume 3: Architectural Historic Properties Identification* (RK&K 2019). Our comments on the undertaking's effect on these historic properties are presented below.

Archeology Comments for Maryland Sections of the APE: Trust staff reviewed the following two draft reports included in the submittal:

1. *Cultural Resources Technical Report Volume 4: Phase I Archaeological Investigation for the I-495 & I-270 Managed Lanes Study, Montgomery and Prince George's County, Maryland and Fairfax County, Virginia* (Arnold et al. 2019) and
2. *Cultural Resources Technical Report Volume 5: Supplemental Phase I Archaeological Survey and Phase II Archaeological Evaluation of Sites 18PR750, 18MO749, and 18MO751 for the I-495/I-270 Managed Lanes Study Project, Prince George's County and Montgomery Counties, Maryland* (Millis et al. 2019).

The reports present detailed documentation on the goals, methods, results and recommendations of Phase I initial and supplemental archeological survey conducted within accessible portions of the corridor study boundary and Phase II evaluations of three sites. The drafts generally meet the reporting requirements of the Trust's *Standards and Guidelines for Archeological Investigations in Maryland*. Attachment 1 lists the Trust's specific comments on the two reports. We ask SHA to have the consultants address these issues, in addition to applicable comments provided by the other consulting parties, in the preparation of the final documents. We await two hard copies and one electronic copy on disk of each final report for our Library, when available.

Based on the information presented in the report, the Trust agrees with MDOT SHA's findings as follows:

- We concur with MDOT SHA's evaluations that the following sites do not meet the criteria for eligibility in the National Register of Historic Places: 18MO22, 18MO750, 18MO753, 18MO754, 18MO755, 18MO756, 18PR425, 18PR750, 18PR1131 and 18PR1133.
- We concur with MDOT SHA's determination that sites 18MO749 and 18MO751 are eligible for inclusion in the National Register of Historic Places.
- We agree that further Phase I and II archeological investigations are warranted in specified areas to which access was denied, for indicated previously inventoried sites once more detailed project plans are developed, and in areas recommended for deep testing as stated in the draft reports.
- Based on the underwater archeological assessment of the American Legion Bridge crossing presented in the draft Phase I report, we agree that significant submerged cultural resources are unlikely to be located within the corridor study boundary and underwater archeological investigations are not warranted at this time.
- We agree that further consultation and coordination are needed to address the appropriate identification and treatment of cemeteries that may be impacted by the undertaking.

Assessment of Effects on Historic Properties: Trust staff carefully reviewed the information presented in MDOT SHA's *Cultural Resources Technical Report Volume 1: Overview and Effects Assessment* (December 2019) and other materials accompanying the submittal. Based on the supporting documentation, the Trust concurs with MDOT SHA's determination that the proposed undertaking will have an adverse effect on historic properties, including archeological properties, in Maryland. Furthermore, the Trust agrees with the following specific findings stated in MDOT SHA's submittal letter dated January 10, 2020 and accompanying attachments:

- We agree that the undertaking will adversely affect the historic properties listed in Table 1 (Attachment #2) and will also adversely affect archeological historic properties 18MO749 and 18MO751.
- We agree that the undertaking may adversely affect the historic properties listed in Table 2 (Attachment #2) and further consultation will be needed during design development to consider and address effects.
- We concur that the undertaking will have no adverse effect on the historic properties listed in Table 3 (Attachment #2).
- We acknowledge that MDOT SHA intends to request that the Federal Highway Administration make a de minimis finding for the minor Section 4(f) use of nine properties listed in Table 4 (Attachment #2). We are also including a signed concurrence sheet to facilitate the de minimis approval process.
- MDOT SHA was not able to fully complete its efforts to identify and evaluate archeological sites that may be impacted by the project given access denial issues and lack of construction

engineering details regarding the full limits of disturbance. Thus, we agree that further Phase I and II investigations may be warranted as planning develops for the following: five survey areas (Areas S-8, S-37, S-44, S-53, S-54), areas recommended for deep testing, the six sites listed in Attachment #3 to the submittal letter (18MO190, 18MO191, 18MO457, 18MO510, 18MO514, and 18MO752), plus the Moses Hall property.

- We agree that further consultation and coordination are needed to address the appropriate identification and treatment of cemeteries that may be impacted by the undertaking.

We understand that MDOT SHA intends to negotiate a Programmatic Agreement (PA), pursuant to 36 CFR 800.14(b) for this undertaking. The PA will not only stipulate mitigation measures to resolve the undertaking's adverse effect on individual historic properties, but also establish a process for ongoing identification of historic properties that may be affected, consideration and resolution of effects on additional resources, and further coordination among the various parties involved in the Section 106 consultation for this complex undertaking. We look forward to a meeting of consulting parties to fully discuss the anticipated effects and begin negotiation of appropriate mitigation measures.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer
EH/BC/TJT/202000116

cc: Caryn Brookman (SHA)
Jeanette Mar (FHWA)
Julie Langan (VDHR)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

Tribes



**OFFICE OF PLANNING &
PRELIMINARY ENGINEERING**
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Environmental Planning Division

May 10, 2018

Good afternoon,

The Maryland Department of Transportation State Highway Administration (MDOT SHA) proposes improvements to I-495 (the Capital Beltway) and I-270 (Washington National Pike) in Montgomery and Prince George's Counties, Maryland, and Fairfax County, Virginia. The I-495 and I-270 Managed Lane Study (MLS) would add two lanes in each direction to both highways, and the study is being done as a Public-Private Partnership (P3).

On behalf of the Federal Highway Administration, we invite you to participate in consultation with MDOT SHA under Section 106 of the National Historic Preservation Act. A preliminary evaluation of the project corridor concluded that the project may impact significant historic properties, including archaeological sites and historic standing structures. Phase I archaeology is planned for the summer of 2018. The evaluation indicates that Phase II evaluation may be required for at least one prehistoric site along Paint Branch, a tributary of the Anacostia and Potomac Rivers, and for the Montgomery County Poor Farm and Cemetery near Rockville, MD, if they are impacted by the project.

Attached is our Section 106 Initiation Letter to the MD State Historic Preservation Officer (MD SHPO), along with the MDOT SHA Tribal Notification Form. We welcome any comments you may have, look forward to further consultation if you are interested.

Please feel free to contact me if you have questions about the project or the current status of planned field investigations.

Best Regards,
Rick

Richard Ervin
MDOT State Highway Administration
Senior Archaeologist
Cultural Resources Section
Environmental Planning Division
707 North Calvert Street, Mail Stop C-LL4
Baltimore, MD 21202
Telephone: (410) 545-2878
Rervin@sha.state.md.us



MD SHA Tribal Consultation: Project Notification Form

Project Name: I-495 and I-270 Multi Lane Study Date: May 2, 2018

FMIS No: AW073A11 A-Proj No: 11729 Master No: _____

County: Montgomery & Prince George's USGS Quadrangle: _____

Project Archeologist: Richard Ervin

Telephone: 410-545-2878 Email: RErvin@sha.state.md.us FAX: 410-209-5046

Brief Project Description (attach a map and detailed project description to this form):

Add two lanes in each direction to I-495 (the Capital Beltway) and I-270

Project Type:

☐ Minor Transportation
☐ Other Categorical Exclusion

☐ Environmental Assessment
☒ Environmental Impact Statement
☐ Other _____

Archeological Potential (pre-Contact or Contact Period Sites)

☒ Known pre-Contact sites in project area
☐ Known Contact sites in project area
☒ Likely to find pre-Contact sites in project area
☐ Likely to find Contact sites in project area

☐ Unlikely to find pre-Contact sites in project area
☐ Unlikely to find Contact sites in project area
☐ No expected ground disturbance
☐ Other _____

Comments:

Tribal Response (tribal use only)

Tribal Contact for this project: Ms. Erin Thompson
Title: Tribal Historic Preservation Officer
Address: 2025 S. Gordon Cooper Drive
City, State, Zip: Shawnee, Oklahoma 74801
Telephone: 405-275-4030 Ext. 6340 Fax: _____
Email: ethompson@astribe.com
Copies to: _____

Please provide any corrections to:
Carol A. Ebright, Senior Archeologist
Maryland State Highway Administration
707 N. Calvert St.
Baltimore, MD 21202
cebright@sha.state.md.us

Consulting Party Status

Do you wish to be a consulting party on this project? ☐ Yes ☐ No ☒ Unsure
If not a consulting party, do you wish to continue to receive information about this project? ☒ Yes ☐ No ☐ Unsure
(Note: If your answer is Unsure, SHA will continue to provide information.)

Areas of Concern (This information will be kept confidential)

Do you wish to inform SHA of any traditional religious and culturally important places in or near the project area? ☐ Yes ☒ No
If "Yes" please inform SHA how to proceed to address the tribe's concerns:

Name of person completing this form (please print): Erin Thompson

Signature: Erin Thompson

Digitally signed by Erin Thompson
DN: cn=Erin Thompson, email=ethompson@astribe.com
Date: 2018.06.14 14:12:41 -0500

Date: Jun 14, 2018

From: Kimberly Penrod <kpenrod@delawarenation.com>

Sent: Thursday, May 31, 2018 11:12 AM

To: Richard Ervin <RErvin@sha.state.md.us>

Subject: RE: MDOT SHA I-495 and I-270 Managed Lane Study (MLS) Public-Private Partnership (P3)

Richard,

The protection of our tribal cultural resources and tribal trust resources will take all of us working together.

We look forward to working with you and your agency.

With the information you have submitted we can concur at present with this proposed plan.

Our main concerns at the Delaware Nation on these types of projects are as follows:

1. Keeping a 50-100 ft (at least) area of protection around known sites.
2. Maintaining the buffer area and not allowing heavy equipment to impact these areas. Compression is an issue of concern for us. Be mindful of material staging/storage areas.
3. Protection of indigenous plants and/or re-introduction of the indigenous plants to the area is important to the Delaware Nation. Many of these are considered Traditional Cultural Properties for our people.
4. And if something is found, halting all work, contacting us within 48 hours and when work resumes discussion of a monitor if needed.

As with any new project, we never know what may come to light until work begins.

The Delaware Nation asks that you keep us up to date on the progress of this project and if any discoveries arise please contact us immediately.

Our department is trying to go as paper free as possible. If it is at all feasible for your office to send email correspondence we would greatly appreciate.

If you need anything additional from me please do not hesitate to contact me.

Respectfully,

*Kim Penrod
Delaware Nation
Director, Cultural Resources/106
Archives, Library and Museum
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Anadarko, OK 73005
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(405)-924-9485 Cell
kpenrod@delawarenation.com*

Unless someone like you cares a whole awful lot, nothing is going to get better. It's not. ~Dr. Seuss



MD SHA Tribal Consultation: Project Notification Form

Project Name: I-495 and I-270 Multi Lane Study Date: May 2, 2018

FMIS No: AW073A11 A-Proj No: 11729 Master No: _____

County: Montgomery & Prince George's USGS Quadrangle: _____

Project Archeologist: Richard Ervin

Telephone: 410-545-2878 Email: RErvin@sha.state.md.us FAX: 410-209-5046

Brief Project Description (attach a map and detailed project description to this form):

Add two lanes in each direction to I-495 (the Capital Beltway) and I-270

Project Type:

☐ Minor Transportation
☐ Other Categorical Exclusion

☐ Environmental Assessment
☒ Environmental Impact Statement
☐ Other _____

Archeological Potential (pre-Contact or Contact Period Sites)

☒ Known pre-Contact sites in project area
☐ Known Contact sites in project area
☒ Likely to find pre-Contact sites in project area
☐ Likely to find Contact sites in project area

☐ Unlikely to find pre-Contact sites in project area
☐ Unlikely to find Contact sites in project area
☐ No expected ground disturbance
☐ Other _____

Comments:

Tribal Response (tribal use only)

Tribes: Delaware Nation

Tribal Contact for this project: Kimberly Penrod

Title: Director, Cultural Preservation Department

Address: P.O Box 825, 31064 State Highway 281

City, State, Zip: Anadarko, OK 73005

Telephone: 405-247-2448, ext. 1403 Fax: 405 247-8905

Email: kpenrod@delawarenation.com

Copies to: _____

Please provide any corrections to:
Carol A. Ebright, Senior Archeologist
Maryland State Highway Administration
707 N. Calvert St.
Baltimore, MD 21202
cebright@sha.state.md.us

Consulting Party Status

Do you wish to be a consulting party on this project:

☒ Yes ☐ No ☐ Unsure

If not a consulting party, do you wish to continue to receive information about this project? ☐ Yes ☐ No ☐ Unsure

(Note: If your answer is Unsure, SHA will continue to provide information.)

Areas of Concern (This information will be kept confidential)

Do you wish to inform SHA of any traditional religious and culturally important places in or near the project area? ☐ Yes ☐ No

If "Yes" please inform SHA how to proceed to address the tribe's concerns:

Name of person completing this form (please print): Kim Penrod

Signature: Kim Penrod

Date: May 31, 2018

From: Jesse Bergevin <jbergevin@oneida-nation.org>
Sent: Thursday, May 31, 2018 12:36 PM
To: Richard Ervin <RErvin@sha.state.md.us>
Subject: RE: MDOT SHA I-495 and I-270 Managed Lane Study (MLS) Public-Private Partnership (P3)

Dear Mr. Ervin,

On May 10, 2018, Oneida Indian Nation (the “ Nation”) received an email and documentation from the Maryland Department of Transportation, State Highway Administration (MDOT), regarding the proposed I-495 and I-270 Improvements project (the “Project”) in Montgomery and Prince George’s Counties, Maryland. The Nation asks to be apprised of the results of the archaeological studies for the Project.

Please let me know if there are any questions.

Thank you,

Jesse Bergevin | Historic Resources Specialist
Oneida Indian Nation | 2037 Dream Catcher Plaza, Oneida, NY 13421-0662
jbergevin@oneida-nation.org | www.oneidaindiannation.com
315.829.8463 Office | 315.829.8473 Fax



MD SHA Tribal Consultation: Project Information Form

Project Name: I-495 and I-270 Multi Lane Study Date: May 14, 2019

FMIS No: AW073A11 A-Proj No: 11729 Master No: _____

County: Montgomery & Prince George's USGS Quadrangle: _____

Project Archeologist: Richard Ervin

Telephone: 410-545-2878 Email: rervin@sha.state.md.us FAX: 410-209-5046

Brief Project Description: Add up to 2 lanes to I-495 (Capital Beltway) & I-270, replace American Legion Bridge over Potomac

Project Status:

☐ Initial Notification

☒ Definition of APE

☐ Completion of Identification Studies (Phase 1)

☐ Determination of Eligibility (Phase 2)

☐ Determination of Effects

☐ Resolution of Adverse Effects

☐ Execution of MOA

☐ Conducting Mitigation (Phase 3)

☐ Other _____

Enclosures: May 14, 2019 letter to MD SHPO, with revised APE at the Potomac River Crossing, including Virginia

Comments: MDOT has identified additional potential impacts at the Potomac River, including Virginia

Tribal Response (tribal use only)

Tribe: The Delaware Nation

Tribal Contact for this project: Erin Thompson

Title: Historic Preservation Director

Address: PO Box 825, 31064 State Highway 281

City, State, Zip: Anadarko, OK 73005

Telephone: 405-247-2448 ext 1403 Fax: 405-247-8905

Email: ethompson@delawarenation-nsn.gov

Copies to: _____

Please provide any corrections to:
Carol A. Ebright, Senior Archeologist
Maryland State Highway Administration
707 N. Calvert St.
Baltimore, MD 21202
cebright@sha.state.md.us

Consulting Party Status

Do you wish to be a consulting party on this project: ☒ Yes ☐ No ☐ Unsure

If not a consulting party, do you wish to continue to receive information about this project? ☐ Yes ☐ No ☐ Unsure

(Note: If your answer is Unsure, SHA will continue to provide information.)

Comments on Enclosures if applicable (please add additional pages if necessary):

Do you agree with the findings of eligibility or effect? ☒ Yes ☐ No

If "No" please comment: _____

Do you have comments on the report or MOA: ☐ Yes ☒ No

If "Yes" please comment: _____

Areas of Concern (This information will be kept confidential)

Do you wish to inform SHA of any traditional religious and culturally important places in or near the project area? ☐ Yes ☒ No

If "Yes" please inform SHA how to proceed to address the tribe's concerns (please add additional pages if necessary):

Do you have any other concerns? ☐ Yes ☒ No

If "Yes" please inform SHA how to proceed to address the tribe's concerns:

Name of person completing this form (please print): Erin Thompson

Signature: Erin Thompson

Digitally signed by Erin Thompson
Date: 2019.07.02 12:35:54 -05'00'

Date: Jul 2, 2019



U.S. Department
of Transportation
**Federal Highway
Administration**

Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Stephen R. Adkins
7240 Adkins Road
King William, VA 23030

Dear Chief Adkins:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Chickahominy Indian Tribe wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



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**Federal Highway
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Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Gerald A. Stewart
1191 Indian Hill Lane
Providence Forge, VA 23140

Dear Chief Stewart:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Chickahominy Tribe Eastern Division wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



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**Federal Highway
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Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Dean Branham
P.O. Box 1136
Madison Heights, VA 24572

Dear Chief Branham:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Monacan Indian Nation wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Murrill", is written over the typed name and title.

Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



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Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Samuel Bass
1001 Pembroke Lane
Suffolk, VA 23434

Dear Chief Bass:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Nansemond Indian Tribe wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



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Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Robert Gray
1054 Pocahontas Trail
King William, VA 23806

Dear Chief Gray:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Pamunkey Indian Tribe wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

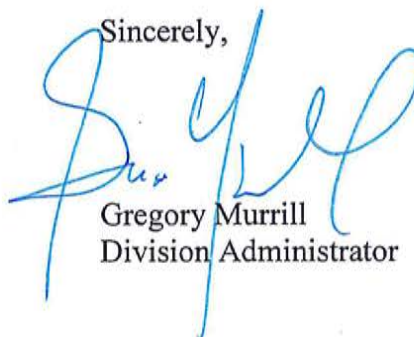
Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



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**Federal Highway
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Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Anne Richardson
5036 Indian Neck Road
Indian Neck, VA 23148

Dear Chief Richardson:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Rappahannock Tribe wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

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Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



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**Federal Highway
Administration**

Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief William F. Adams
5932 East River Road
King William, VA 23086

Dear Chief Adams:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Upper Mattaponi Indian Tribe wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources

Additional Consulting Parties

CITY OF GREENBELT, MARYLAND

OFFICE OF THE CITY MANAGER

25 CRESCENT ROAD, GREENBELT, MD. 20770

May 11, 2018



Nicole C. Ard
City Manager

Ms. Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division
Maryland Department of Transportation, SHA
707 North Calvert Street
Baltimore, MD 21202

Re: Study No. AW073A11
I-495 & I-270 Managed Lane Study
Section 106 Review

Dear Ms. Schablitsky:

The City of Greenbelt is in receipt of your letter dated, April 12, 2018, requesting comment on historic preservation issues as they relate to the I-495 & I-270 Managed Lane Study. The City appreciates the opportunity to comment and looks forward to being an active partner in the Section 106 process. This letter incorporates responses from the three consulting parties for the City of Greenbelt.

The Greenbelt City Council is on record in opposition to the proposed widening of I-495 and I-270 (letter attached). While the City's opposition extends beyond the Section 106 process, for the purpose of responding to your request, this letter will focus on issues relevant to the identification and protection of historically and culturally significant resources.

The City is very concerned about the impact that the proposed widening project will have on the historic character and integrity of Historic Greenbelt. Greenbelt is historically significant as one of three planned communities built through the Federal government's "Green Towns Program" during the Great Depression. Greenbelt is significant for its status as a national model for community planning and design. In November 1980, Greenbelt was listed as a Historic District in the National Register of Historic Places. The boundaries of the District were drawn to include areas of the City directly related to the establishment and expansion of the planned community between 1935 and 1941. In 1997, Historic Greenbelt was designated a National Historic Landmark. Within the "Area of Potential Effects" lay portions of the Greenbelt National Register Historic District, National Historic Landmark designated areas, the historic Walker Family Cemetery, Buddy Attick Lake Park, segments of the Baltimore Washington Parkway, portions of the United States Department of Agriculture's Beltsville Agricultural Research Center and portions of Greenbelt National Park.

A NATIONAL HISTORIC LANDMARK
PHONE: (301) 474-8000 www.greenbeltmd.gov



The proposed highway widening project's impact on Historic Greenbelt and significant historical resources is unacceptable. The resources listed above have significant value to the history and character of Greenbelt, as well as the State. These historic resources must be protected, as mandated under Federal Law. The City continues to strongly urge the State of Maryland to use its resources to improve alternative existing multi-modal transportation options (i.e., MARC, Metro service, bus transit and bike routes).

The proposed plan to widen the Capital Beltway infringes on Greenbelt's parkland, open space and Forest Preserve. These areas have been proven to be vitally important to a person's health and quality of life. The City has actively invested in the creation of forested open space. The City of Greenbelt's robust Recreation and Parks system is heavily used by Greenbelt residents, businesses and others from surrounding cities and counties. These award-winning, multigenerational and inclusive recreation programs, facilities and parks are of vital importance in a densely populated urban area. For these reasons, the Greenbelt Recreation Department opposes the proposed project.

Thank you for the opportunity to comment. The City looks forward to continued participation in the Section 106 process, as well as future planning processes. If you have any questions please contact Ms. Terri Hruby, Planning Director, at 240-542-2041 or by email at thruby@greenbeltmd.gov.

Sincerely,

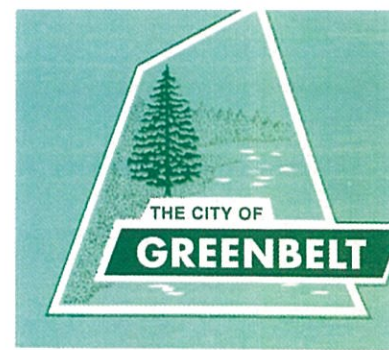


Nicole Ard
City Manager

cc: City Council
Terri Hruby, Planning Director
Julie McHale, Director of Recreation

CITY OF GREENBELT

25 CRESCENT ROAD, GREENBELT, MD. 20770-1886



October 23, 2017

The Honorable Lawrence Hogan, Jr.
Office of the Governor
100 State Circle
Annapolis, MD 21401

Re: Proposed Highway Widening Projects

Dear Governor Hogan:

CITY COUNCIL

Emmett V. Jordan, Mayor
Judith F. Davis, Mayor Pro Tem
Konrad E. Herling
Leta M. Mach
Silke I. Pope
Edward V.J. Putens
Rodney M. Roberts

The Greenbelt City Council is opposed to the proposed widening of I-270, the Capital Beltway (I-495) and the Baltimore-Washington Parkway (MD 295) to accommodate managed and/or toll lanes. These highway widening projects will not solve our region's road congestion problems.

Studies have shown that highway expansion projects ultimately do not relieve congestion. Instead research indicates that such projects encourage more driving, longer trips and increase suburban sprawl -which further stresses the environment, creates a greater maintenance burden to support an inefficient transportation network, and costs Maryland citizens time and money. In fact, the deficiency of this proposal was published in the 2012 Baltimore-Washington Parkway Widening Feasibility Study which concluded that:

"While a widened B-W Parkway will accommodate greater traffic volumes, the magnitude of increased travel demand on the facility generated by continuing anticipated regional population and employment growth will likely result in levels of traffic congestion similar to those experienced today."

The impact that the proposed highway widening projects will have on the natural, socioeconomic, cultural and built environments is unacceptable. Established neighborhoods adjacent to these highway corridors will be negatively impacted by a diminished quality of life, as will the users of the Parkway. Also, the natural and cultural significance of the Baltimore-Washington Parkway cannot be ignored. The Parkway is listed on the National Register of Historic Places, an indication of its significant value to the history and character of Maryland. This historic treasure deserves to be respected for its original function as a scenic byway. The segment of the Parkway that is owned by the National Park Service should be retained by the National Park Service. To transfer ownership to the State will threaten its historic designation, and most likely result in the byway being transformed by State of Maryland Highway standards, destroying its scenic and parkway setting.

In a time when communities are wrestling with environmental and socioeconomic challenges, proceeding with highway widening projects that do little to address the region's congestion, but have high environmental, human and financial costs, raises questions and concerns that need to be carefully considered. Before moving forward to construction of these projects, alternative congestion relief approaches should be studied and considered, including dedicating more funding to transit and other alternative modes of transportation. We need to allocate our limited resources to supporting the live, work and play philosophy by investing in transit oriented development and the infrastructure necessary to attract and sustain it.

The City strongly urges your administration to consider utilizing resources to expand and improve the existing alternative transportation routes. The MARC Train serves the Baltimore-Washington Corridor. Resources dedicated to improving MARC Train service hours would do more to relieve congestion on the Corridor while maintaining the unique beauty, and relief that the Parkway provides to the regional road network. The new economy cannot support a

A NATIONAL HISTORIC LANDMARK

(301) 474-8000 FAX: (301) 441-8248

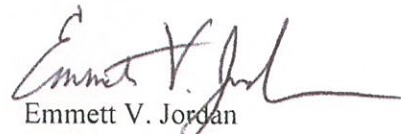
www.greenbeltmd.gov

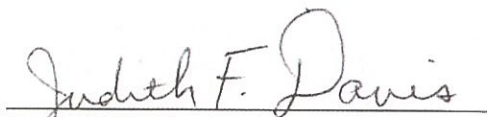


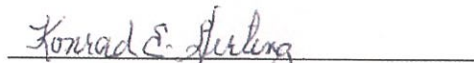
continued disconnect between transportation projects and land use development patterns that do little to support a sustainable future.

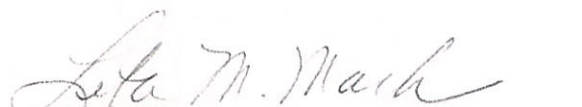
The City requests that you withdraw your support for the I-495 and I-295 widening projects, and allow an opportunity for the state transportation agencies to pursue other congestion relief approaches. We can collectively work together towards developing a plan that will relieve traffic congestion on our highways while minimizing impacts to the natural and built environment.

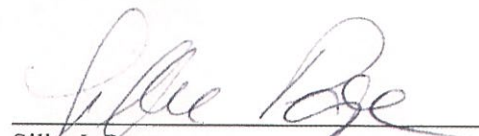
Sincerely,


Emmett V. Jordan
Mayor

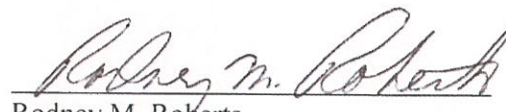

Judith F. Davis
Council Member


Konrad E. Herling
Council Member


Leta M. Mach
Council Member


Silke I. Pope
Council Member


Edward V.J. Putens
Council Member


Rodney M. Roberts
Council Member

Enclosure: Baltimore-Washington Parkway Widening Feasibility Study (November 2012)

cc: City Council
Senator Ben Cardin
Senator Chris Van Hollen
Congressman Steny Hoyer
Senator Paul Pinsky
Delegate Anne Healey
Council Member Derrick Davis
Council Member Dannielle Glaros
Council Member Andrea Harrison
Council Member Mary Lehman
Council Member Deni Taveras
Council Member Obie Patterson
Council Member Karen Toles
Council Member Mel Franklin
Four Cities Coalition
Nicole Ard, City Manager
Terri Hruby, Acting Director of Planning & Community Development



MONTGOMERY COUNTY DEPARTMENT OF PARKS
MARYLAND-NATIONAL CAPITAL PARK & PLANNING COMMISSION

May 18, 2018

Dr. Julie Shablitsky
Assistant Division Chief
Environmental Planning Division
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Dear Dr. Shablitsky,

The Maryland-National Capital Park and Planning Commission, Montgomery Parks (Parks) has (by carbon copy) received your letter dated April 12, 2018 to Ms. Elizabeth Hughes, State Historic Preservation Officer, Maryland Historical Trust (MHT), concerning the proposed Study No. AW073A11, the I-495 & I-270 Managed Lanes Study (MLS), inviting MHT and local agencies to comment on MDOT's preliminary Area of Potential Effects (APE) and participate in the Section 106 process. As you know, M-NCPPC is a Cooperating Agency in the Interagency Working Group (IAWG). Representatives from Montgomery Parks' Cultural Resources Stewardship Section also participated in the May 3, 2018 meeting held at SHA's Baltimore office on the Section 106 process for this project. At that meeting, Parks was asked to submit comments to SHA on the preliminary APE and preliminary identification of cultural resources. We expect to refine and supplement these comments as the project progresses and the actual project impacts are defined more accurately.

As both Interstates 495 and 270 transect some of the most important cultural resources in the County, archaeological resources, historic objects and structures, and cultural landscapes will be adversely affected by the project. The heart of the County's park system, which originates in 1927, are its stream valley parks; these are all impacted by the proposed project. Due to concern for the loss of cultural resources, any alternatives considered must include a package of environmental and community stewardship mitigation projects that adequately offset the breadth of this major public works project.

The Preliminary Area of Potential Effects (APE)

The April 12, 2018 letter to MHT identifies two APE boundaries – one for direct impacts to National Register listed or eligible resources (the 300-foot from centerline Corridor Study Boundary), and a larger one for direct and indirect impacts (the Corridor Study Boundary plus an additional 250 feet to either side). Due to the lack of clarity on where the boundary for direct impacts lies at this time, Parks expects that MDOT/SHA will use the larger APE (which is

approximately 550' from the centerline) for *both* archaeology and standing structures assessments.

Identified Historic Resources on Parkland

There are two identified historic resources in the Project Area:

- Rock Creek Park Montgomery County Survey Area (M: 36-87)
- Sligo Creek Parkway (M: 32-15)

Within these linear stream valley park systems there are numerous contributing elements, some of which are strictly in the preliminary APE, others that are immediately outside but should be considered, and others that are yet to be identified. Joseph's Park Boundary Marker from 1817, for example, is an object within Rock Creek Park Stream Valley Unit 2. The Sligo Creek Golf Clubhouse is a building along the Sligo Creek Parkway in its Stream Valley Unit 3. There are other cultural resources in the preliminary APE that should be identified by SHA's consulting architectural historians.

Archaeology on Parkland

Currently, there are five recorded archaeological sites within the preliminary APE on parkland. These include:

- 18M0191 – Kavanagh XII site (Cabin John Regional Park)
- 18M0332 – Rock Creek Stream Valley site (Rock Creek Stream Valley Unit 2)
- 18M0457 – Booze Creek site (Cabin John Stream Valley Unit 2)
- 18M0510 – Rock Creek Hills #1 (Rock Creek Stream Valley Unit 2)
- 18M0602 – Fuster site (Northwest Branch Stream Valley Unit 3)

Based on preliminary research, none of these have been evaluated for their eligibility for inclusion on the National Register. In addition, large sections of the APE cross parkland in areas that have not been systematically surveyed for the presence of archaeological sites. As noted in the April 12, 2018 letter to MHT, SHA has identified 49 discrete areas in the overall project that appear to be undisturbed and will require additional testing. Parks requests a map identifying these areas so that we can contribute to them based on our knowledge of potential archaeological resources on parkland.

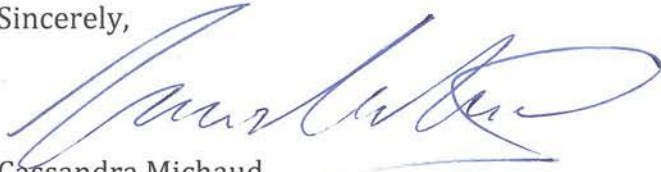
Additionally, Parks would like to inform SHA of a cemetery not currently noted on the maps provided in the April 12, 2018 letter to MHT. Gibson Grove Cemetery, which is not on parkland, lies within the preliminary APE on the west side of Seven Locks Road. The cemetery was divided from the Gibson Grove Church during the construction of I-495 years ago. It is listed as #105 on the Montgomery County Cemetery Inventory housed on the Planning Department website:

<http://montgomeryplanning.org/planning/historic/montgomery-county-cemetery-inventory/montgomery-county-cemetery-inventory-alphabetical/>

Parks encourages MDOT/SHA to consult this inventory regularly so as not to miss burial sites.

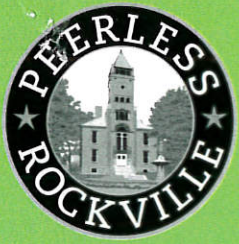
M-NCPPC, Montgomery Parks appreciates the opportunity to be a Cooperating Agency in the IAWG and specifically to consult with SHA on the Section 106 aspects of this project, which will have a significant impact to the cultural landscape of the county. We look forward to continuing to work with SHA on identifying and protecting cultural resources on parkland as the project moves forward.

Sincerely,



Cassandra Michaud
Senior Archaeologist, RPA

Cc: Beth Cole, Maryland Historical Trust
Jeanette Mar, Federal Highway Administration
Steve Archer, State Highway Administration
Jai Cole, M-NCPPC, Montgomery Parks, Acting Chief, Park, Planning and Stewardship
Matt Harper, M-NCPPC, Montgomery Parks, Natural Resources Manager
Doug Stephens, M-NCPPC, Montgomery Parks, Natural Resources
Joey Lampl, M-NCPPC, Montgomery Parks, Cultural Resources Stewardship
Julie Mueller, M-NCPPC, Montgomery Parks, Cultural Resource Stewardship
Rebecca Ballo, M-NCPPC, Montgomery Planning, Historic Preservation



Preserving Rockville's Heritage

August 27, 2018

Department of Transportation
State Highway Administration
707 North Calvert Street, Mail Stop P-601
Baltimore, MD 21202

To Whom It May Concern:

I write to you today on behalf of Peerless Rockville Historic Preservation's Board of Directors and members, concerning the proposed plans to expand interstate 270 and the harmful effects of the physical widening of I-270 will have on the historic resources and community fabric of the City of Rockville and Montgomery County.

Peerless Rockville is a nonprofit, community-based organization founded in 1974 to preserve buildings, objects, and information important to Rockville's heritage. We advance our goals through education, example, advocacy, and community involvement. As a historic preservation advocacy organization, we are deeply concerned about the potential impact of the I-270 expansion project on Rockville's historic resources as well as the identity of its unique neighborhoods that this project threatens.

The City of Rockville has many neighborhoods representing its development over time. The post-war years featured a boom in housing and construction that resulted in expansion and growth of the City and formed the modern communities that thrive today. Development and consideration of historic contexts should include a focus on the post-war, Mid-Century, and late 20th century built environment. Although not currently listed as historic, many communities within the area of potential effects meet National Register eligibility criteria.

For example, the neighborhood of New Mark Commons was recently added to the National Register of Historic Places as an exemplary illustration of "Situated Modernism," combining clustered and free-standing houses within a rolling, wooded landscape. Other neighborhoods like this exist all along the I-270 corridor. Many of Rockville's neighborhoods were constructed during this period to take advantage of the "new" highway infrastructure. We are gravely

concerned by any option for I-270 expansion that widens the footprint of the roadway in Rockville, threatening these long-standing communities, and we strongly urge you to choose alternate plans.

As a designated consulting partner to 106 Review, Peerless Rockville looks forward to working with SHA and other partners in protecting Rockville and Montgomery County's important historic resources throughout this study. As a community advocate, we stand strong in our desire to protect the rich heritage of our community.

Peerless Rockville Historic Preservation, Ltd. possesses an abundance of materials on Rockville's history, heritage, and historic homes and sites. We encourage all researchers and consultants documenting areas impacted by the I-270 expansion project to visit our office and utilize our archives and collections located in the historic Old Red Brick Courthouse in downtown Rockville.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Pickard". The signature is written in dark ink and is positioned above the printed name.

Nancy Pickard

Executive Director

CC:

City of Rockville Mayor & Council

City of Rockville Historic District Commission

Elizabeth Hughes, State Historic Preservation Officer

From: Sarah Rogers <director@heritagemontgomery.org>
Sent: Monday, September 24, 2018 3:21 PM
To: Steve Archer <SArcher@sha.state.md.us>
Subject: Re: MDOT SHA I-495/I-270 Managed Lanes Study Section 106 Update

Replying to MDOT SHA Managed lanes study – keep us on the list.
Sarah L. Rogers
Heritage Montgomery

From: David, Gail <Gail.David@montgomerycountymd.gov>

Sent: Wednesday, November 7, 2018 2:31 PM

To: Steve Archer <SArcher@sha.state.md.us>

Cc: Jeanette Mar, FHWA <jeanette.mar@dot.gov>; David Clarke, FHWA <david.clarke@dot.gov>; Caryn Brookman <CBrookman@sha.state.md.us>; Beth Cole, MHT <beth.cole@maryland.gov>; Tim Tamburrino, MHT <tim.tamburrino@maryland.gov>

Subject: Re: I 495/I-270 Managed Lanes Study Agenda and online/call-in information for Section 106 Consulting Party Meeting Tuesday, November 13

Hi Steve,

I apologize but I will not be able to attend this meeting. Please continue to keep me on the emails. Thank you!

Gail David

Deputy Warden, Operations

Department of Correction and Rehabilitation

22880 Whelan Ln.

Boys, Maryland 20841

240-773- 9928 (MCCF)

240-773-9975 (fax #)

240-777-9817 (MCDC)

gail.david@montgomerycountymd.gov

From: Jim Wasilak <jwasilak@rockvillemd.gov>

Sent: Monday, November 19, 2018 4:50 PM

To: Steve Archer <SArcher@sha.state.md.us>

Cc: Sheila Bashiri <sbashiri@rockvillemd.gov>; Ricky Barker <rbarker@rockvillemd.gov>

Subject: RE: I-495/I-270 MLS Section 106 Consultation: documents available and November 13 Consulting Party Meeting

Steve: The City of Rockville does not have comments on the Gap Analysis or Suburbanization Context Addendum at this time. However, the City does want to continue as a consulting party, so please keep Sheila Bashiri and myself on your list. I have let Matt Manning know that the City has development files on many of the properties listed in the Newly Identified Buildings and Districts chart within Rockville, and we will be forwarding that info to him over the coming weeks.

Thanks, Jim

R. James Wasilak, AICP
Chief of Zoning
Department of Community Planning and Development Services
City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
240-314-8211 (direct)
240-314-8200 (CPDS main)
jwasilak@rockvillemd.gov





MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

November 19, 2018

Steve Archer
Cultural Resources Team Leader
Environmental Planning
MDOT State Highways Administration
707 North Calvert Street
Baltimore, MD 21202

RE: I-495/I- 270 Managed Lanes Study, Section 106 Comments

Dear Mr. Archer:

Thank you for providing the opportunity to review and comment on the latest Section 106 review materials as part of the I-495/I-270 Managed Lanes Study. **These comments reflect the comprehensive comments from the Cultural Resources Sections of the M-NCPPC Montgomery County Parks and Planning Departments.**

Gap Analysis

The Gap Analysis and Suburban Context Addendum documents add significantly to the original context for this project and will be a useful tool in assessing the architectural and planning aspects of the sites that may be affected by the proposed project. While clearly a great deal of effort went into researching and writing it, we nonetheless find that it lacks certain crucial information, and the consultant did not tap certain sources, and local context is underrepresented, both in the sections on the built environment and archaeology. The Gap Analysis and Addendum lack substantive information on the social and cultural aspects of the potentially affected neighborhoods (Criterion A). While providing a thorough study of the transportation and mainstream developer-generated housing, the analysis to date also omits a discussion of those who lived in Montgomery County outside of majority-white neighborhoods. For instance, were any of the possibly affected neighborhoods associated with Montgomery County's African American history, or the history of the large influx of Asian and Latino communities into the County? Around 40% of Montgomery County's population was enslaved in the first half of the 19th century. After the Civil War, freedmen and women settled across Montgomery County, many in areas that are in proximity to the proposed project. These settlements were regularly omitted from the historical documents most commonly used by researchers and alternative methods for their identification are often required. Similarly, were any of the communities studied Jewish or representative of other excluded groups as a result of being shut out of communities due to restrictive covenants? These important historical aspects are not taken into consideration in the document or as part of the survey strategy.

Archaeological Context

There are four known or potential cemetery locations within the APE for the project: Gibson Grove AME Church Cemetery; Ball Family Cemetery; St. John the Evangelist Catholic Church Cemetery (Forest Glen Cemetery); and The Poor Farm site and cemetery (18MO266). The Gap analysis lacks the Ball Family burial ground, which included at least two interments dating to 1855 and 1862. The stones were removed from the vicinity of I-270 and Montrose Road in the 1950s prior to the construction of the interstate

highway. The stones survive and are stored nearby. Montgomery County Cemetery Inventory files contain leads regarding the original burial site location within the project APE.

The St. John the Evangelist Cemetery is referenced in the gap analysis indirectly as part of the Forest Glen historic district. The discussion in the gap analysis makes no mention of the cemetery, but focuses exclusively on late 19th-century suburban development. The cemetery comprises nearly half the physical area of the district, and the first interment (the mother of John Carroll, first catholic bishop in the United States) dates to 1796. There are several notable early 19th-century headstones made of Seneca Sandstone, the same striking red stone used to build the church. The cemetery boundary is very close to, and possibly within the corridor boundary. Approximately half the cemetery, including the original location of the 1770s church, are within the architecture APE.

Generally, the archaeological context appears to be largely derived from research conducted in environmental settings of the Coastal Plain, with little focus on the Piedmont, which comprises most of Montgomery County. This context should be corrected.

Requested Next Steps

We welcome the offer of MDOT/SHA to have locality/consulting party specific meetings. Montgomery County would like to host such a meeting, and would work with SHA to invite County-specific stakeholders to the discussion. At this meeting we could work with MDOT/SHA to introduce the team and consultants to our extensive research files. This would also be an ideal opportunity to provide information from the Montgomery County Cemetery Inventory so that the potential effect to cemetery sites within the APE are adequately considered.

We also request that as Determination of Eligibility forms (DOEs) are sent to MHT for review, that these forms be concurrently transmitted to M-NCPPC (both Montgomery Planning and Montgomery Parks) so that we may also review and provide comments. Handling the property-specific reviews in smaller batches will enable us to provide feedback and analysis on a rolling basis, instead of having to review the entire set of DOEs at once near the end of the documentation phase of the project.

We also request that future Consulting Parties meetings provide initial assessments and analysis of impacts to Cultural Resources under 4F and NEPA. Some resources may have more stringent protection requirements under 4F and it would be helpful to understand and review any analysis that may have informed decisions on choosing a Preferred Alternative at the next and at all future meetings.

We would also like to thank the MDOT/SHA project team for providing the requested archaeological survey information and GIS maps after the last Consulting Parties meeting on November 13th. Given that it is standard practice to allow 30-days of review of new information, M-NCPPC requests until COB Friday, December 14, 2018 to fully review this extensive material, including the archaeological survey areas that we have just received digitally. This is a large, complex project and, as such, requires adequate time to evaluate from the outset the framework for identifying and evaluating potential historic properties, as required under Section 106 of the National Historic Preservation Act. We also look forward to reviewing the final reports for the Phase I archaeological assessments currently underway.

Thank you again for the opportunity to comment. If you have any questions or need to discuss this matter, please feel free to contact us at 301-563-3404; Rebeccah.Ballo@montgomeryplanning.org, or 301-563-3414; Joey.Lampl@montgomeryparks.org.

Sincerely,



Rebecca Ballo
Historic Preservation Supervisor, Montgomery County Planning



Joey Lampl,
Cultural Resources Manager, Montgomery County Parks

cc: Jeannette Mar, FHWA
Jason Shellenhammer, RKK
Tim Tamborino, Maryland Historical Trust
Beth Cole, Maryland Historical Trust
Carol Rubin, Montgomery Planning
Matt Harper, Montgomery Parks
Doug Stevens, Montgomery Parks
Cassandra Michaud, Montgomery Parks

Post Office Box 4661
Rockville, MD 20849-4661
Web: www.montgomerypreservation.org
Email: mpi@montgomerypreservation.org

Montgomery Preservation Inc.

Promoting the Preservation, Protection and Enjoyment of Montgomery County's Rich Architectural Heritage and Historic Landscapes

November 19, 2018

Steve Archer, Cultural Resources Team Leader
Environmental Planning Division, State Highway Administration
Via email

Re: Section 106, 495/270 Managed Lanes Study

Dear Steve,

I write on behalf of Montgomery Preservation Inc. (MPI) to offer general comments about the referenced project. We are impressed by the scope of the study and its identification of resources, districts, and parks from which to pare down historic places that may be affected. Please know that MPI has a strong interest in this wide-ranging project, and we pledge to work with all parties to facilitate the process.

Of the 160 Montgomery County properties identified in all of the categories, many fall into the suburbanization context. We are pleased that the date was extended to 1978, as important planned communities are now included along with individually notable structures. Others pre-date this late 19th to mid-20th century era. Some are listed in the National Register and/or designated locally by Montgomery County or a municipality such as Rockville.

MPI is just completing its Montgomery County Cemetery Inventory Revisited project which, as it updated efforts from a decade ago, utilized advanced technology and additional data to better document 323 known burial sites throughout the County. Four sites (Ball Cemetery ID# 279, Gibson Grove #105, MoCo Poor Farm #196, and St. John the Evangelist #131) are appropriately identified in your study.

If the APE is enlarged at any point in this process, and you want to broaden the study to include farther north sites such as Comsat or Moneysworth farm (both in Clarksburg) and other burial sites (such as Scotland in Rockville), we will help to provide additional information.

Lastly, MPI encourages you to meet in the near future with Montgomery County Historic Preservation and Parks staff, and include MPI, to more specifically discuss our County resources and to coordinate efforts. There is no doubt that this highway project will have major effects on Montgomery County.

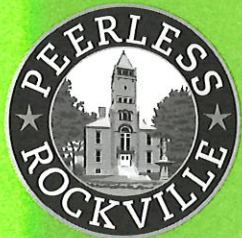
Sincerely yours,

/s/

Eileen McGuckian, president
Montgomery Preservation Inc.
Consulting Party

- General: The Gap Analysis only focuses on Maryland and does not look at Virginia, as it states: "Section 106 requirements for both archaeology and historic architecture in Virginia for this project are being addressed separately by the Virginia Department of Transportation for their ongoing project to extend the American Legion Memorial Bridge High Occupancy Toll (HOT) Lanes to the George Washington [Memorial] Parkway." Curious if this VDOT project covers the entirety of the MLS project area in Virginia. It would be helpful to see a graphic highlighting the two project areas to verify there will be complete coverage of the MLS project area within Virginia, as well as to ensure resources under the administration of the George Washington Memorial Parkway are properly identified (e.g., archeological sites).
- General: The Gap Analysis does not discuss underwater archeology or the potential for submerged cultural resources to exist within the project area. Given that a portion of the project area crosses the Potomac River at the American Legion Bridge, the potential for such resources to exist must be assessed. This includes expanding the historic context to include early maritime activities that took place within and adjacent to the project area and examine the potential for submerged cultural resources to be present.
- Section 1.1.1, p. 3: Please use the full, official name of the 'George Washington Memorial Parkway' in this report and subsequent project documentation (as opposed to the colloquial 'GW Parkway') - GLOBAL.
- Section 2.1 Background Research: There are other documentary sources related to CHOH that would be of use for a desktop survey of archaeological resources including Berger's 9-year study of the canal (Fiedel et al 2005). I realize that the survey did not include property within the MLS study area, but would provide a broader context. (Also applies to 4 Regional History).
- Section 2.3.2 Criteria for Archaeological Potential-- How are they determining "previous disturbance" in determining if an area has archaeological potential?
- Section 2.4.1 Previously Identified Historic Resources-- Text only references state data. Should include Federal (NPS) data from the parks.
- Section 4.1.1, p. 17. Recommend correcting the date in the section header from '1100 BC' to '11,000 BC.'
- Section 5.1.1 Previous Archaeological Surveys-- More survey needs to be done on the CHOH. Yes, agree. Fieldwork should be planned for the fall or winter when ground visibility is best. Nearby archaeological surveys have been unable to identify previously recorded sites due to vegetation (e.g. Kavanaugh 1981). Why did NPS deny survey applications for Diamanti et al. 2008? The reason should be stated.
- Section 5.1.2.B, p. 47. Recommend removing the underscore from the first paragraph.
- Section 6.2.1, p. 55. The text in the 'Significance' section for the Suitland Parkway appears gray, whereas the other text is black. Recommend correcting.
- Section 7.5.2, p. 104. There appears to be a random page break in the middle of the page.
- Section 7.6. I realize that the C&O Canal locks are mentioned several times and they appear in figures (e.g. Figure 19), but nowhere is there specific mention of Locks 12, 13, and 14, which are directly under the ALB and within the APE and project corridor.
- Section 7.6. Good, yes, survey is recommended at CHOH.
- Section 8.1, p. 112. In the second paragraph, numbers less than ten are provided numerically and are also spelled out.

- Section 9.2. List the National Park units as well. In addition, C&O Canal is a historic district (NR listed)
- Appendix D, Map 2. Survey area S-12 partially overlaps with site 18MO22 (Potter site), so it would therefore be beneficial for the survey team to do limited fieldwork at the site to determine if any portion of it remains undisturbed, especially since they will already be in the area (see Section 7.4, p. 93 for details/recommendations).
- Page 51. Location: Change to "Cumberland, MD."
- Page 51, Period of Significance: The 2015 update to the C&O Canal NHP Historic District National Register nomination included an extended period of significance. Prehistoric and historic resources begins and continues the period from 9000 BCE through the original 1828 to 1924 period of significance (when the canal was built and operated). After the canal ceased commercial operation in 1924, a noncontiguous period of significance takes in the New Deal-era years of 1938 to 1942 for the district's association with Civilian Conservation Corps activity, and 1965 for the district's association with the NPS Mission 66 program.
- Page 51, NRHP: In 2015, the C&O Canal NHP Historic District National Register nomination was updated and the boundary was increased.



Preserving Rockville's Heritage

Steve Archer
Maryland Department of Transportation State Highway Administration
Cultural Resources Team Leader
Cultural Resources Section
Environmental Planning Division
707 North Calvert St
Baltimore, MD 21202

November 19, 2018

To Whom It May Concern,

Peerless Rockville writes to you today regarding the numerous properties potentially impacted by expansion of the I-270/495. The area in question contains hundreds if not thousands of homes and neighborhoods, businesses, and other developed properties that make up the fabric of the community of the City of Rockville. We thank you for the opportunity to participate in the review of the landscape representing Rockville's important and varied development during the modern period.

The 1950s in Rockville are defined by explosive population (over 200% growth) and doubling in land size. Early communities representing this growth include parts of the **West End**, and **Roxboro**. It should be noted that tiny Roxboro also has 1940s growth, predating the intensity of the post-war period.

Rockville's transportation infrastructure improvement and plans around this time, including I-270, led to the development of the neighborhoods of **Woodley Gardens**, **New Mark Commons**, and **Rockshire**.

Woodley Gardens is a "modern" neighborhood that bears the distinction of being one of Rockville's earliest pre-planned communities. At Woodley Gardens Colonial-inspired brick houses and apartments sit on streets with floral names such as Azalea, Crocus, Lily and Carnation. The neighborhood with its mix of homes, townhouses and co-operative apartments also boasts recreational and community amenities not found in most earlier housing developments. Monroe Warren Sr. and Monroe Warren Jr. developed Woodley Gardens using an innovative planning approach, which combined multiple housing types, with open space for natural features and recreation, and added a community shopping area.

In the early 1960s, veteran builder Monroe Warren Sr., known for earlier apartment and housing

developments in Washington D.C. as well as the Rockcrest neighborhood in Rockville, began construction on the western edge of Rockville. Here he and his son strove to create a community of high quality “prestige” homes. The conventional architectural style of the homes extended throughout the community and with the inclusion of tennis courts, baseball fields and an Olympic-sized swimming pool. The community amenities proved attractive to homebuyers, many of whom located to Rockville to work at government agencies that expanded to Montgomery County.

New Mark Commons has recently been added to the National Register of Historic places as a superior example of mid-century architecture and development patterns representing the physical, social and economic fabric of Montgomery County and Rockville during this period of growth and change.

A “situated modernism” community, New Mark Commons was designed by homebuilder Edmund J. Bennett and the modernist architecture firm Keyes, Lethbridge & Condon to harmoniously integrate the various housing types and community amenities with preserved natural features. The specific design of each home was selected based on which model best fit the natural topography and modern homes were clustered on courts and cul-de-sacs. New Mark Commons was the first PRU (Planned Residential Unit development) in Rockville and retained high integrity as a significant modernist community.

Rockshire is the largest of the Planned Residential Units (PRU) zoned in Rockville, which permitted greater flexibility in the layout of the subdivision so that other community goals, such as open space, could be achieved. Single family homes, townhouses, churches, and schools are located in this community. Within Rockshire and its neighboring Fallsmead are approximately 150 acres of city-owned parkland. Rockshire illustrates how a modern community and 19th century structures can co-exist and be integrated within the natural environment.

Rockshire’s initial developers were Community Builders, led by Albert Small and Hermen Greenberg, whose *Southern Engineering* would eventually build more than 20,000 homes, condominiums, and office buildings throughout the DC metropolitan region. The planning for this neighborhood employed clustering, laying out smaller lots, conscious of the environmental features of the landscape.

The communities that developed alongside Watts Branch in the 1970s invited people to an environmentally sensitive watershed. Historically populated by farms near the early 19th century Wooton’s Mill that utilized Watts Branch in its operations, construction here met the challenge of being environmentally sensitive while building coherent neighborhoods combining large modern homes and community amenities.

The environmental work of Luna Leopold (1915-2006), famed American geologist and hydrologist, influenced the management of Watts Branch Stream Valley Park. Leopold’s ground-breaking 40-year study of Watts Branch revealed the effects of suburbanization on the environment.

These neighborhoods and the others that began in the 1960s and 1970s, including **Fallswood, Saddlebrook, Markwood, Briarglen, North Farm and Montrose Wood**, are intrinsically connected to the transit systems that enabled commuters to travel from to workplaces throughout the capitol region.

These residential developments were accompanied by an increasing need for schools, churches, shopping centers, office buildings, libraries, medical, health care, and recreation facilities. Virtually every aspect of life in suburbia – shopping, employment, education, recreation, religious worship – was geared to “Car Culture” and was designed to accommodate the family car and suburban mobility made possible by transportation infrastructure.

New school construction followed patterns of residential development throughout the area as planners and public officials struggled to keep pace with suburban growth. In all, 23 new elementary, middle, and high schools opened in Rockville between 1950 and 1971. **Julius West Middle School** (1961) was part of this pattern.

Similarly, the growing population needed more and larger religious institutions. By 1960, the number of churches and religious institutions in Rockville had more than doubled. Rockville’s established churches adapted to the population boom by enlarging existing church facilities or relocating and rebuilding on new sites, as did both the Rockville Christian Church and the First Baptist Church.

First Baptist Church (from Teresa Lachin’s *Recent Rockville*)

Established in 1821, the First Baptist Church (1908) was located near the center of Rockville on Jefferson and Washington Streets. An Education Building (today the Garza Building) for Sunday school classes was built in 1958, and two years later the congregation purchased an adjacent property on Washington Street for a Colonial-style sanctuary to house its growing membership.

Fund-raising and parking space for the new million dollar facility proved difficult, and in 1968, the congregation sold their properties in town and purchased nine acres of undeveloped land one mile west of the downtown area at the intersection of 70-S (today I-270) and Route 28. The new site offered room for future expansion, ample parking space, convenient access to major roads and new neighborhoods, and visibility along a well-traveled interstate corridor. In making a fresh start at the new location, the congregation abandoned plans for a traditional Colonial-style church and directed their architect, Russell Jenkins of McClean, Virginia, to design “something modern-looking,” a multi-purpose facility with a sanctuary, offices, meeting space, and classrooms.⁴² Jenkins’ preliminary design for a 1,500-seat sanctuary was reduced in scale to meet site requirements and budget restraints. A revised design for a modernist two-story brick building with a dramatic folded plate roof and broad sheltering canopy over the main entryway was approved and built. A spacious foyer leads into the fan-shaped sanctuary, which is illuminated by clerestory windows under the roofline and exposed wooden beams.

Anticipating demolition of the 1908 Church on Washington Street, the congregation salvaged two large stained glass windows and installed them in the entry hall of the new facility. In 1973,

the Church transferred ownership of its historic Baptist Cemetery near the old Church to the protection of the Montgomery County Historical Society. Ten years later, ownership and care of the Cemetery was transferred to Peerless Rockville Historic Preservation, Ltd.

Healthcare & Technology

Nursing homes and retirement communities opened during the 1970s near the burgeoning communities of Fallsmead and Rockshire west of 70-S (today I-270). The Collingswood Nursing and Rehabilitation Center on Hurley Avenue was completed in 1972; the Rockville Nursing Home in Roxboro in 1976, and Potomac Valley Nursing and Wellness Center in 1964.

Proximity to federal research institutions, such as the National Institutes of Health and Naval Medical Center, and long range City planning initiatives helped foster Rockville's impressive postwar development as a prime location for scientific endeavor.

Population growth brought increasing numbers of science professionals and college-educated residents to the area, creating imperatives for modern health care and state-of-the-art medical facilities. Equally important to this development were the availability of affordable building sites and a pool of trained architects, builders, developers, and labor force to plan, design, and construct medical and scientific properties. Commercial buildings in area should be evaluated for involvement in the Human Genome Project, which occupied numerous large-scale buildings in and around the Rockville area in the later part of the 20th century.

Commercial Retail, Offices, & Industry

Development along Rockville Pike and other major roads followed on the heels of residential and commercial development, drawing customers away from downtown Rockville to new strip malls and shopping centers, such as Seven Locks Plaza.

By the late 1950s, unprecedented numbers of new office buildings were being planned, completed, or under construction. Like new schools and churches, Rockville's commercial and institutional architecture was predominantly modernist in design, affording curtain wall construction, versatile open interior spaces, and use of technologically innovative building materials. By contrast, legal office buildings of the 1960s and 1970s were more generally more traditionally styled with brick construction and Colonial-inspired details.

Decentralization of federal agencies (e.g., National Bureau of Standards, Atomic Energy Commission) to the suburbs fostered a generation of consulting firms offering professional expertise in science, industry, communications, and emerging technologies.

Other:

Detention Center:

Examples of Brutalist architecture in Rockville include the **Montgomery County Detention Center**. The architectural style known as Brutalism originated during the postwar era and takes its name from *béton brut*, a French term used by Swiss architect Le Corbusier for unfinished, sometimes raw, concrete used on exterior facades of large-scale buildings. Brutalism emerged in part as a reaction to the skeletal profile of the Miesian grid and purist geometry of the International Style. Le Corbusier's *Unité d'Habitation* (1948-1954) in Marseille, France, is considered a landmark example of the style. Brutalist buildings are blocky and starkly geometric with heavy surfaces of exposed concrete that express the mass and construction of design. Doorways are placed within cavernous entry plazas; windows are recessed and fenestration is frequently minimal (Definition description from Teresa Lachin's Recent Rockville).

Poor Farm:

Construction of roads and buildings during the past 60 years has almost obliterated all traces of the Montgomery County Poor Farm and the Poor Farm Cemetery. Despite construction, and the removal of burials, the site has historic significance. During a site visit in September 2018 a trash pit, likely associated with the Poor Farm, was located next to an office building at 1101 Wootton Parkway. While the cemetery site has been heavily disturbed by decades of construction, it may still contain burials, or other subsurface objects of historic significance. Even a systematic excavation of a cemetery will often miss burials, and given the nature of this cemetery, with many unmarked graves, and the haphazard way in which it has been excavated, there is a possibility that intact graves remain on the site.

Note: Burials impacted by construction earlier transportation infrastructure, I-270, the expansion of I-270, and the construction of 1101 Wootton Parkway were most often removed by workers from Snowden Funeral Homes and relocated to Parklawn Cemetery. Some burials were removed by an archaeological crew working for the National Park Service (1987-88) and were sent for study, but appear to have been returned and reinterred, likely at Parklawn. All burials which were removed have not been confirmed to be re-interred at Parklawn, although that is what has been verbally reported by Snowden representatives on several occasions. Snowden has not granted access to its records to researchers. Parklawn has graciously opened records to researchers and accompanied us to the burial plot, which is marked.

11807 Dinwiddie Drive:

This structure contains part of the original 1918 two-story frame house belonging to the O'Neale family of planters who made a land claim in 1769, and willed the property including 68 acre farm to descendants. The farmhouse is likely one of few surviving structures from this early 20th century agricultural period.

Research Library & Other Resources

Peerless Rockville, a non-profit historic preservation advocacy organization, possesses a research library that contains information on the history of many of these modern properties. We invite you to visit us to learn more about many of the listed addresses.

The City of Rockville has engaged consultants to produce a study of Rockville's historic contexts which will be relevant to your interests. We also recommend Teresa Lachin's publication "Rockville's Recent Past" (2012), from which much of the subject of this letter is sourced, for more information on this time period.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Pickard". The signature is fluid and cursive, with a large, stylized "P" and "C".

Nancy Pickard

Executive Director

From: [Smith, Kathryn](#)
To: [Steve Archer](#)
Subject: Re: [EXTERNAL] I-495/I-270 MLS Section 106 Determination of Eligibility forms, Batch 4 Posted, comments requested by Feb. 28, and additional info
Date: Tuesday, February 26, 2019 6:25:37 PM

Steve,

The following are comments for your consideration as you prepare the documentation on historic properties within the APE:

First, I noticed that some of the DOE forms say they are just documenting earlier determinations done by MHT -- saying they are not eligible in 2000. Should these properties be re-evaluated in 2019 since nearly 20 years has passed? (examples: PG:73-24; PG:73-22; PG:73-23).

Also, I am wondering if the roadway and its alignment itself has been evaluated for NR eligibility? Records show that the Olmsted firm worked on the Beltway project, at least in the area where it crosses Rock Creek Park in Montgomery County (near Connecticut Ave.). Apparently the planners wanted it to be parkway-like in this segment and so they hired Olmsted. According to my colleague, there's a job- number and associated records in the Olmsted records. You can search the records here: https://www.nps.gov/frla/olmstedarchives.htm#CP_JUMP_4037582

Best,
Kathryn

Kathryn G. Smith
National Historic Landmarks & National Register Coordinator
National Capital Region, National Park Service

1100 Ohio Drive, SW
Washington, DC 20242
202.619.7180
202.401.0017 fax

kathryn_smith@nps.gov

NCR Website <https://www.nps.gov/RESSNCR>

NHL Website <http://www.nps.gov/nhl>

Facebook [National Historic Landmark Program - NPS](#)

Instagram [NationalHistoricLandmarkNPS](#) #NationalHistoricLandmark #FindYourPark

On Thu, Feb 7, 2019 at 2:56 PM Steve Archer <SArcher@sha.state.md.us> wrote:

Greetings Consulting Parties,

From: Eileen McGuckian <phileen3@verizon.net>

Sent: Tuesday, March 26, 2019 3:35 PM

To: Steve Archer <SArcher@sha.state.md.us>

Subject: comments for I-495/I-270 MLS Section 106 Consultation: comments on Batch 5

Hello Steve and all,

Thank you for posting Batch 5 of the determination-of-eligibility (DOE) forms for this project.

On behalf of Montgomery Preservation, I have a few comments.

In batch 5, 11807 Dinwiddie Drive in Rockville is listed as the John Henry O'Neale house and is briefly mentioned in the DOE form for Montrose Woods M 30-48.

However, although this individual property is in your batch list, there is no separate DOE form for it.

Full disclosure: This has been my home for 30+ years, and I did meet the surveyors when they visited one frosty day this winter, but have heard nothing further.

I have conducted research on this house, which I describe as the O'Neale-Prichard-Cantelon/McGuckian house for its three owners 1865-present, and would be happy to provide it to you in an appropriate format.

The other comment relates to the archaeological aspect of this consultation:

Shouldn't the identified burial sites be included with each batch?

Again, full disclosure: Two grave markers from Ball Cemetery (ID#279 on the Montgomery County Cemetery Inventory) are on my property (address above). They were moved from their original, nearby site by previous owner Ann Prichard in the late 1960s and are now safely indoors.

Again, I have conducted research on this burial site, including oral histories of individuals who recall the cemetery. And again, I would be happy to provide information to you in an appropriate format; best would be the Cemetery Inventory-Revisited survey form.

Lastly, other burial sites within the APO should be identified in the DOE process: Gibson Grove Cemetery ID#105, the Montgomery County Poor Farm Cemetery ID#196, and St. John the Evangelist Cemetery in Forest Glen ID#131.

Please confirm that you have received this communication.

Sincerely,

Eileen McGuckian, president
Montgomery Preservation Inc.



MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

March 28, 2019

Steve Archer
Cultural Resources Team Leader
Environmental Planning
MDOT State Highways Administration
707 North Calvert Street
Baltimore, MD 21202

RE: I-495/I- 270 Managed Lanes Study, Section 106 Determination of Eligibility Forms, Batch 5 Comments

Dear Mr. Archer:

Thank you for providing the opportunity to review and comment on the latest Section 106 Determination of Eligibility (DOE) forms as part of the I-495/I-270 Managed Lanes Study. Please see the below comment(s) on the following DOEs:

- 1) Property Name: Holy Cross Hospital
Address: 1500 Forest Glen Road, Silver Spring, 20910
Batch: 5

Holy Cross Hospital warrants a full DOE rather than a Short Form DOE for ineligible properties. The architecture firm of Faulkner, Kingsbury & Stenhouse, who specialized in modernist institutional buildings in the postwar era, designed the hospital. Architect Slocum Kingsbury, FAIA (1893-1987), graduated from Cornell University, served in World War I, and practiced architecture in New York City before moving to Washington, D.C. Kingsbury specialized in hospital design and the building received a Washington Board of Trade Award and AIA Potomac Valley Award in 1964.

While Holy Cross Hospital has had alterations/additions to the main building and though the determination may remain static, the complex should be re-evaluated within a full historic context. Please refer to the following book for more information: Clare Lise Kelly, *Montgomery Modern* (Silver Spring, MD: M-NCPPC, 2015).

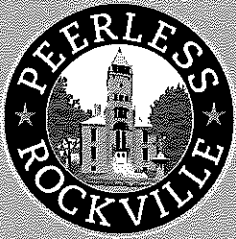
Thank you again for the opportunity to comment. If you have any questions or need to discuss this matter, please feel free to contact me at 301-563-3405 or John.Liebertz@montgomeryplanning.org.

Sincerely,

John Liebertz
Historic Preservation Specialist, Montgomery County Planning

cc: Rebecca Ballo, M-NCPPC, Planning HP Supervisor

Joey Lampl, M-NCPPC, Parks Cultural Resources Stewardship Manager
Julie Mueller, M-NCPPC, Parks Cultural Resources Stewardship Planner Coordinator
Cassandra Michaud, M-NCPPC, Parks Cultural Resources Archaeologist
Brian Crane, M-NCPPC, Planning Archaeologist
Jeannette Mar, FHWA
Tim Tamborino, MHT
Jason Shellenhammer, RKK
Beth Cole, MHT
Eileen McGuckian, President, Montgomery Preservation, Inc.
Nancy Pickard, Executive Director, Peerless Rockville



Preserving Rockville's Heritage

Maryland Department of Transportation State Highway Administration
Cultural Resources Team Leader
Cultural Resources Section
Environmental Planning Division
707 North Calvert St
Baltimore, MD 21202

March 28, 2019

To Whom It May Concern:

Peerless Rockville writes to you today regarding the numerous properties listed in Batch 5 of the Determination of Eligibility that are potentially impacted by expansion of the I-270/495. The area in question contains hundreds if not thousands of homes and neighborhoods, businesses, places of worship and other developed properties that make up the fabric of the community of the City of Rockville. We thank you for the opportunity to participate in the review of the landscape representing Rockville's important and varied development during the modern period.

Overall, we assert that greater investigation of potential association with significant individuals and events is required for the neighborhoods in and near Rockville before determined ineligible, particularly given the size and period of history represented in the area.

For instance, **4 Choke Cherry Road** is a Mid-twentieth century Brutalist-influenced building constructed in 1974 which retains much of its original character. Current occupants include the Montgomery County Public School Center for Technology Innovation, Project Reboot (providing computer systems to low income families). We note that no data is provided on its architects, builders, or past occupants. This information should be obtained and evaluated before eligibility can be determined.

The **West End Park Section 2** was platted in 1890 as part of West End Park. The community reflects a broad range of single-family residential development patterns, beginning in the 1890s and continuing until the present, with the largest periods of growth in the early 1950s and the 1960s. A variety of firms and architects were responsible for creating the area, including initial development by Henry Copp and Reuben Detrich, also known for their work in Garret Park and Kensington respectively. In the 1960s, development was primarily by James E. Cafritz, also known for Aspen Hill Park and Laurel Grove.

Rockshire Village is functionally part of Rockshire, the largest of the Planned Residential Units (PRU) zoned in Rockville, which permitted greater flexibility in the layout of the subdivision so that other community goals, such as open space, could be achieved. Single family homes, townhouses, churches, and schools are located in this community. Within Rockshire and its

neighboring Fallsmead are approximately 150 acres of city-owned parkland. Rockshire illustrates how a modern community and 19th century structures can co-exist and be integrated within the natural environment.

The planning for this neighborhood employed clustering, laying out smaller lots, conscious of the environmental features of the landscape. The communities that developed alongside Watts Branch in the 1970s invited people to an environmentally sensitive watershed. Historically populated by farms near the early 19th century Wooton's Mill that utilized Watts Branch in its operations, construction here met the challenge of being environmentally sensitive while building coherent neighborhoods combining large modern homes and community amenities.

The environmental work of Luna Leopold (1915-2006), famed American geologist and hydrologist, influenced the management of Watts Branch Stream Valley Park. Leopold's groundbreaking 40-year study of Watts Branch revealed the effects of suburbanization on the environment.

These residential developments were accompanied by an increasing need for schools, churches, shopping centers, office buildings, libraries, medical, health care, and recreation facilities. Virtually every aspect of life in suburbia – shopping, employment, education, recreation, religious worship – was geared to “Car Culture” and was designed to accommodate the family car and suburban mobility made possible by transportation infrastructure.

The John Henry O’Neale House is indeed one of the few extant dwellings representing the early twentieth century agricultural history of Montgomery County that preceded the mid-20th century population explosion. The absence of farm-related outbuildings and fields is reflective of the late 20th century development that encroached upon the property, representing the suburban transformation of the area.

Research Library & Other Resources

Peerless Rockville, a non-profit historic preservation advocacy organization, possesses a research library that contains information on the history of many of these modern properties. We invite you to visit us to learn more about many of the communities.

Sincerely,

A handwritten signature in cursive script, reading "Nancy Pickard".

Nancy Pickard

Executive Director

SAVE OUR
SEMINARY



AT FOREST GLEN

9615 Dewitt Drive #68
Silver Spring, MD 20910
301-589-1715
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www.saveourseminary.org

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Frank Riley, Secretary
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Toni Bailey
Anne Brockett
Pat Crawford
Ann Hall
Patti Horrall
Linda Lyons
Chris Maines

Executive Director
Bonnie Rosenthal

June 11, 2019

The Honorable Pete K. Rahn, Secretary
Maryland Department of Transportation
State Highway Administration
I-495 & I-270 P3 Office
707 North Calvert Street
Mail Stop P-601
Baltimore, MD 21202

Re: I-495 and I-270 P3 Program

Dear Mr. Rahn:

We are writing to express our position on the I-495 and I-270 P3 Program, especially the seven currently recommended Alternatives Retained for Detailed Study (ARDS).

Many of the proposed I-495 expansion routes would harm a woodland area with a tributary of Rock Creek flowing through it. This area, known as "the Glen," is deemed a critical natural resource by the Maryland-National Capital Park and Planning Commission and is protected by a Category I Conservation Easement that prohibits altering the natural landscape.

The Glen borders the southern edge (the "inner loop") of I-495 for over 800 linear feet. Close to that edge are historic and possibly archaeological features that include a bridge abutment and stone retaining wall that were once part of the network of paths, bridges, and trails used by students of the former National Park Seminary (NPS) in Silver Spring, Maryland. We are concerned that expansion of the highway likely will adversely affect these features as well as the landscape into which they were deliberately designed, and which currently provides green space to both residents and the public.

NPS, once an elite girls' school (from the late 1800s until the 1940s), was transferred to the United States Army for a military convalescence hospital in 1942. Today, the historic campus is a residential community providing single- and multi-family housing for all income levels and includes the offices of a charitable organization supporting homeless adults. NPS is designated as a Historic District in the National Register of Historic Places and is listed on the Maryland Inventory of Historic Properties. The Maryland Historic Trust finds NPS's historic assets so valuable and significant that it has placed the property within a Preservation Easement.

Our organization, Save Our Seminary (SOS), knows this landscape well. SOS is a nonprofit organization incorporated in 1989 to combat the neglect of the unique and historic buildings and landscape of NPS. SOS's ongoing mission is to communicate the history of the National Park Seminary and promote preservation of its buildings, artifacts, and landscape.

At this time, we do not know where the proposed expansion, if it occurs, will be located, but NPS's location makes it highly vulnerable. We ask that the MDOT take the time to study fully the potential effects of this action and explore every feasible avenue other than road expansion into this historic greenspace. We strongly urge you to avoid claiming historic and natural features to reduce traffic congestion.

Sincerely,

Bonnie Rosenthal
Executive Director



CARDEROCK SPRINGS

National Register of Historic Places

June 12, 2019

Governor Larry Hogan
100 State Circle
Annapolis, Maryland 21401-1925

Administrator Gregory Slater
Maryland State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202-36-01

Subject: Comments about alternatives retained for detailed study & concerns about planned Beltway expansion

I am the President of Carderock Springs Citizens' Association (CSCA) and write on behalf of the Carderock Springs community, a historic community located adjacent to the west side of Interstate 495 (the Beltway) and Carderock Springs South, a community located adjacent to the east side of the Beltway.

Our community was very disappointed to learn at the SHA public workshop on April 13, 2019 that despite our previous comments submitted to SHA on April 30, 2018 and October 1, 2018, SHA selected Alternatives that would add two lanes in each direction. As we have previously stated, adding 2 lanes in each direction would reduce the distance between the lanes of the Beltway where vehicles will travel and school and residences, resulting in increased noise and dangerous air pollution. That means, contrary to Governor Hogan's earlier promises to keep the Beltway expansion within the right-of-way (ROW), our community was shocked to learn on April 13 that:

1. Many homeowners might be losing parts of their yards (at least temporarily) should the alternatives that will be adding two lanes each direction be chosen. As previously noted in our comments, Carderock Springs has been designated a National Historic District that is listed in the National Register of Historic Places. A greater level of analysis and limitations on decision-making under Section 106 of the National Historic Preservation Act and Section 4 (f) of the Department of Transportation Act is warranted. Taking away these properties is not acceptable.
2. Traffic will be much closer to the Carderock Springs Elementary School (CSES), with a large area of the school and field exposed to noise of more than 66 dB and harmful pollution. In addition to previously cited research confirming the harmful effect of highway pollution on children's lung development, we also note that CSES has three classrooms for children with autism. Children on the autism spectrum are extremely sensitive to noise and we believe that their needs should be part of the on-going analysis of the ARDS and possible remediation if I-495 is expanded. Thus, not only will the effects of a beltway expansion be felt within a

Carderock Springs Citizens' Association
P.O. Box 237, Cabin John, MD 20818-0237

www.carderocksprings.net

sensitive population, but such effects will be felt by a sensitive population *within a sensitive population*. Action must be taken to mitigate noise impacts at this location.

3. Elevated ramps over the Beltway linking managed lanes and River Road are also included as part of the ARDS, which will expand significantly the area negatively affected by noise and air pollution. Placing such elevated ramps in a residential area is, to our knowledge, an approach that has been rejected in all other jurisdictions as its negative effect is multiplied.

While our concerns are closely linked to the adverse effects that expanding the Beltway would have on our community, we share the views expressed by Montgomery County and others requesting the environmental, fiscal, and traffic impacts of proposed plans. Alternatives 8, 9, 10, 13B and 13C will, according to the very preliminary analysis provided in the Managed Lanes Study, have unacceptable impacts. We request that SHA assesses more carefully and comprehensively traffic patterns than it has up to now as it plans road expansion.

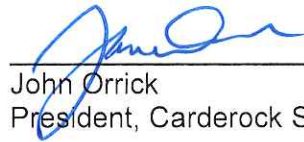
CSCA therefore requests that the SHA's environmental review and EIS specifically include the following:

- Conduct a new noise impact study to serve as the current baseline to measure the current level of Beltway noise in the vicinity of Carderock Springs given increased traffic over the last 17 years. If this study shows that current noise levels require a noise wall as abatement, any project alternative selected, even if limited only to traffic control measures, should include the building of a noise wall to specifications designed to ensure significant noise reduction.
- The traffic data used for the noise study to project future conditions should be conservative and be based on worst-case-scenarios in order to obtain true and correct traffic projections, both to determine the need for managed lanes, and to project actual traffic noise and emissions.
- In conducting the air pollution impact study to measure the current and projected levels of Beltway air pollutants in the vicinity of Carderock Springs, the health impacts of those current levels of pollutants, and the need for mitigation, the study must recognize and take into account the proximity of CSES and its athletic fields to the Beltway, and the potential for traffic to be even closer to these sensitive receptors if the ROW is expanded or if travel lanes are brought closer to the outside boundaries of the existing ROW.
- Evaluation of eligibility of Carderock Springs for Type I abatement under both existing conditions and future conditions.
- Include as a component of the alternatives (not as potential mitigation) a solid noise barrier along both sides of the Beltway in the vicinity of Carderock Springs
- Establish an I-495 & I-270 Community Working Group for community members, including Carderock Springs representation to actively participate in the development of the Draft Environmental Impact on I-495 & I-270 Managed Lanes Study and in any Section 106 Programmatic Agreement or

Governor Larry Hogan
Administrator Gregory Slater
June 12, 2019
Page 3

Memorandum of Agreement, so the input and comments of these important stakeholders can shape SHA's further planning, review, design, and mitigation, rather than having these uniquely-situated stakeholders being relegated to participating only in the post-Draft Environmental Impact Statement public comment period.

We trust that you will seriously consider these comments.



John Orrick
President, Carderock Springs Citizens' Association

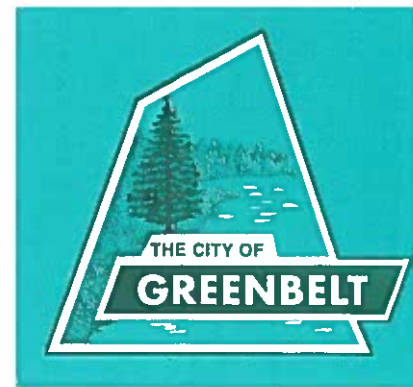
cc: Marc Korman, Delegate, District 16
Sara Love, Delegate, District 16
Susan Lee, Senator, District 16
Andrew Friedson, Councilmember, Montgomery County
Jack R. Smith, Superintendent, Montgomery County Public Schools

Carderock Springs Citizens' Association
P.O. Box 237, Cabin John, MD 20818-0237
www.carderocksprings.net

CITY OF GREENBELT, MARYLAND

DEPARTMENT OF PLANNING & COMMUNITY DEVELOPMENT

15 CRESCENT ROAD, SUITE 200, GREENBELT, MARYLAND 20770-1897



June 26, 2019

Steve Archer
Cultural Resources Team Leader
Maryland Department of Transportation State Highway Administration
Environmental Planning Division
707 North Calvert Street
Baltimore, MD 21202

RE: Preliminary List of Adversely and Potentially Adversely Affected Historic Properties

Dear Mr. Archer:

The City of Greenbelt has reviewed the preliminary list of adversely and potentially adversely affected historic properties as of June 17, 2019 and the City is concerned about the omission of certain properties from the list. The widening of the Capital Beltway (I-495) will have an impact on natural, socioeconomic, cultural, and built environment which would include Historic Greenbelt and its significant historical resources. These are resources that have significant value to the history and character of Greenbelt, as well as the State, and must be protected, as mandated by Federal law.

The City requests the following be added on the list:

- The Greenbelt Historic District, designated a National Historic Landmark (NHL) in 1997, whose boundaries encompass 756.8 acres in four discontiguous parcels. There are a large number of contributing resources which should be considered including the following ones.
 - The Turner Family Cemetery (now the Greenbelt City Cemetery) identified in 1937 government plans as the community's cemetery.
 - The Walker Family Cemetery/Indian Springs Park, a 1.3 acre site of springs, forest, and a burial ground is which was retained as an historical/recreational point of interest for the original community residents. This is a contributing resource.

In addition, the highway widening plans would include the Baltimore Washington Parkway, a scenic highway that was constructed to improve connectivity between Baltimore and

A NATIONAL HISTORIC LANDMARK

PHONE: (301) 345-5417 FAX: (301) 345-5418 TDD: (301) 474-2046

www.greenbeltmd.gov



Washington DC, first envisioned by Pierre L'Enfant in his original plan for the United States Capital in 1791. The widening runs counter to the protection of the Parkway's aesthetic underpinnings.

The City continues to strongly oppose the proposed widening of the Capital Beltway to accommodate managed and/or toll lanes. The City is not in favor of alternatives that would require widening and believes that the project should limit its consideration to the alternatives that seek to manage transportation capacity and demand using only the existing paved right-of-way. In addition, the City advocates for study and identification of alternatives for congestion relief and dedication of more funding to transit.

The City is also concerned that this project will lead to more vehicles on the road, more congestion, more greenhouse gas emissions and air pollution – impacts that are not included in the screening criteria.

Thank you for the opportunity to comment. If you have any questions please contact Terri Hruby, Planning Director at 301-345-5417.

Sincerely,



Terry S. Hruby

cc: City Council
Nicole Ard, City Manager

From: Ballo, Rebecca <rebeccah.ballo@montgomeryplanning.org>

Sent: Wednesday, July 3, 2019 3:47 PM

To: Steve Archer <SArcher@mdot.maryland.gov>

Cc: Jeanette Mar, FHWA <jeanette.mar@dot.gov>; Beth Cole, MHT <beth.cole@maryland.gov>; Tim Tamburrino, MHT <tim.tamburrino@maryland.gov>; Caryn Brookman <CBrookman@mdot.maryland.gov>; Matt Manning <MManning@mdot.maryland.gov>; Lampl, Joey <joey.lampl@montgomeryparks.org>; Rubin, Carol <carol.rubin@montgomeryplanning.org>; Crane, Brian <Brian.Crane@montgomeryplanning.org>; Liebertz, John <John.Liebertz@montgomeryplanning.org>

Subject: RE: I-495/I-270 MLS Section 106 DOE forms, Batch 8, Consulting Party Meeting reminder 6/17 1pm

Good afternoon Steve,

The following are the compiled comments from Montgomery County Park & Planning on the Batch 8 DOEs. We have also included preliminary comments on other items.

- The Batch 8 Determinations of Eligibility included reference to Maryland Historical Trust Site M: 26-6, The Poor Farm, site and Cemetery. The corresponding mapped location for this resource in the Maryland Historical Trust archaeological site files (Site 18MO33) and in the Montgomery County Burial Sites Inventory is on the opposite side of I 270, on the north side of Wootton Parkway nearly half a mile away from the location investigated for Batch 8. Archaeological investigations for the Managed Lanes project must include the location and surroundings of Site 18MO33.
- Montgomery Parks concurs that Cabin John Regional Park is not eligible for the National Register of Historic Places *based on the current Determination of Eligibility (DOE) form*. Montgomery Parks concurs that Argyle Local Park is not eligible for the National Register of Historic Places *based on the current DOE form*. Montgomery Parks concurs that North Chevy Chase Local Park is not eligible for the National Register of Historic Places *based on the current DOE form*.

We do want to note that in the absence of any thorough archaeological information and technical reports, these concurring statements are premature and preclude us from making a truly informed decision on these DOEs or the project as a whole. Should archaeological features or sites be found in any of the above sites or in those released in previous batches, our response would change.

We continue to await technical reports, an expanded Area of Potential Effect (APE) map for Alternative 10, and the Determination of Effect (DOE) forms that would result.

Our response to the items distributed for review at the June 17, 2019 Section 106 Consulting Parties meeting (e.g., the List of Adverse Effects, the Draft Programmatic Agreement) and to other big-picture questions or discussion items are predicated on receiving the forthcoming technical reports and above items and to be given the time and tools to appropriately review a significant amount of new information. In addition, we point out that SHA's objection to supplying the M-NCPPC with GIS shape files for the project seriously undermines our ability to accurately correlate and respond to the impact of the project.

We look forward in the future to putting forth a formal recommendation that seeks an evaluation of the M-NCPPC's stream valley park system *as a whole* starting with formation and up to its mature years (before the M-NCPPC ventured into the establishment of regional parks). Montgomery County Parks and Planning recommend taking a holistic approach to determining the eligibility of the stream valley parks under Criterion A across both Montgomery and Prince George's Counties instead of reviewing the individual stream valley parks (or sections of the parks) as distinct entities. We believe that under Criterion A, there should be a way to take an *integrated* look at the regional and environmental planning import of this stream valley park system across the entirety of the M-NCPPC. Should we put forth this recommendation formally, and should it lead to a National Register Determination of Eligibility under Criterion A, the Department of Parks for both Montgomery and Prince George's Counties will require a signed Programmatic Agreement among the M-NCPPC, NCPC, and MHT to allow the land-owning Agencies to be able to continue to operate the stream valley park system as we do now, for the benefit of the residents of both counties, and without any undue regulatory hardship.

Lastly, at our June 17th meeting your team had offered to work with us to hold separate coordination meetings in addition to the larger CP meetings. We will work within our agency to identify some dates and communicate those with you soon. Thank you for the opportunity to comment.

Sincerely,



Rebecca Ballo
Historic Preservation Program Supervisor | Montgomery County Planning Department
8787 Georgia Avenue | Silver Spring, Maryland 20910
Tel: 301-563-3404; Email: Rebecca.Ballo@montgomeryplanning.org



Ms. Joey Lampl
Cultural Resources Manager
The Maryland-National Capital Park and Planning Commission
9500 Brunett Avenue
Silver Spring, MD 20901
301-563-3414

From: Lampl, Joey <joey.lampl@montgomeryparks.org>
Sent: Thursday, August 1, 2019 4:18 PM
To: Steve Archer <SArcher@mdot.maryland.gov>
Cc: Ballo, Rebecca <rebecca.ballo@montgomeryplanning.org>; Mueller, Julie <julie.mueller@montgomeryparks.org>; Michaud, Cassandra <cassandra.michaud@montgomeryparks.org>; Rubin, Carol <carol.rubin@montgomeryplanning.org>; Harper, Matthew <Matthew.Harper@montgomeryparks.org>; Stephens, Douglas <Douglas.Stephens@montgomeryparks.org>; Cole, Jai <jai.cole@montgomeryparks.org>
Subject: Batch 9 Comments ML Study M-NCPPC, Montgomery Parks

Hello Steve,

Here is the response from M-NCPPC, Montgomery Parks on Batch 9 of the Managed Lane Study:

M-NCPPC, Montgomery Parks does *not* concur with the DOE finding that Cabin John SVP is ineligible for the National Register. Parks believes Cabin John SVP is eligible under Criterion A as a natural stream valley park within the broader park system that also includes Rock Creek Park and Sligo, which have been found eligible. All are part of the same cultural landscape system that M-NCPPC created to preserve the watersheds of the Anacostia and the Potomac. Even though Cabin John SVP was implemented later than Rock Creek or Sligo, its implementation in the early 1960s would simply mean that a period of significance might range from ca. 1929 to the early 1960s.

As I have mentioned in the past, these comments do not include anything we might add on the impact to archaeological resources as we would need to review the full archaeological technical report.

In addition, as you have asked for the identification of additional consulting parties, please remind me if the National Capital Planning Commission is a consulting party. As you know, many of the units in M-NCPPC's stream valley park system were purchased with Capper-Crampton funds that tie our history and ongoing park use to NCPC involvement.

Sincerely,
Joey

Ms. Joey Lampl
Cultural Resources Manager
The Maryland-National Capital Park and Planning Commission
9500 Brunett Avenue
Silver Spring, MD 20901
301-563-3414

From: Stabler, Jennifer <Jennifer.Stabler@ppd.mncppc.org>
Sent: Friday, August 2, 2019 2:40 PM
To: Steve Archer <SArcher@mdot.maryland.gov>
Subject: RE: I-495/I-270 MLS Section 106 DOE forms, Batch 9

Hi Steve,

The Prince George's County Historic Preservation Section has reviewed the Batch 9 DOE forms and we concur with the eligibility evaluations recommendations provided.

Please let me know if you have any questions or need any additional information.

Thanks,

Jennifer

Jennifer Stabler, Ph.D.
Archeology Planner Coordinator
Historic Preservation Section
The Maryland-National Capital Park & Planning Commission
14741 Governor Oden Bowie Drive
Upper Marlboro, MD 20772
301-952-5595 (Voice)
301-952-3799 (Fax)



CARDEROCK SPRINGS
National Register of Historic Places

October 9, 2019

Lisa B. Choplin
Maryland State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202-36-01

Subject: Carderock point-of-contact for the Section 106 process, Draft EIS

Dear Mrs. Choplin,

Thank you for your response of July 10, 2019 to our June 12, 2019 comment letter regarding the proposed Beltway widening project. There were some points raised in your letter that I wanted to respond to.

Our historic community as well as the children that attend the Carderock Springs Elementary School face significant community integrity, quality of life and learning impacts from the Beltway expansion. As our comment letter stated, adding 2 lanes in each direction would reduce the distance between the lanes of the Beltway where vehicles will travel and school and residences, resulting in an increased noise and dangerous air pollution. This approach wouldn't be compatible with our designation as a National Historic District and with a learning environment for the children in our community and elementary school that includes students with autism.

Given our National Historic Designation, our community looks forward to participating and providing its input during the Section 106 process. John Tiernan (jtier@verizon.net) will be representing Carderock in this process. Konstantin Gartvig (kgartvig@yahoo.com) and Elena Kazakova (elenawiz@gmail.com) will be alternates.

Our community is strongly interested in SHA's evaluation of noise mitigation through sound barriers construction and how these can address our concerns on sound and air quality impacts. Once this analysis is completed, we would like to invite SHA representatives to come to our community to discuss the findings.

Also, if public reviews of the Draft EIS are still planned for December 2019, our community would like to participate in the public hearings on the Draft EIS. Please alert us when these are to take a place so we can organize a community meeting to discuss these findings directly with our residents. We hope that our community concerns will be heard and addressed in the Draft EIS.

Thank you for your attention to this matter.



John Orrick
President, Carderock Springs Citizens Association

cc: The Honorable Andrew Friedson, Councilmember, Montgomery County Council
The Honorable Marc Korman, Maryland House of Delegates
The Honorable Susan C. Lee, Senate of Maryland
The Honorable Sara Love, Maryland House of Delegates
Mr. Jack R. Smith, Superintendent, Montgomery County Public Schools
Mr. Jeffrey T. Folden, P.E., DBIA, Deputy Director, I-495 and I-270 P3 Office, SHA
Mr. Gregory Slater, Administrator, MDOT SHA
John Tierman
Konstantin Gartvig
Elena Kazakova

From: Josh Tulkin <josh.tulkin@mdsierra.org>
Sent: Friday, October 25, 2019 5:37 PM
To: Steve Archer <SArcher@mdot.maryland.gov>
Subject: Response to request for consulting party status

Oct 25, 2019

To Steve Archer
Cultural Resources Team Leader
Maryland Department of Transportation State Highway Administration
Environmental Planning Division
707 North Calvert Street
Baltimore, MD 21202
Phone 410-545-8508
sarcher@mdot.maryland.gov

Re: Request for consulting party status on section 106 review of RCSVP Units #2,3

Dear Mr. Archer,

The Sierra Club is deeply concerned about proposed impact of the proposed expansion of highways 495 and 270 in Maryland, also known as the "Manager Lanes Project" and its potential effects on historic properties.

We understand that consultation has been initiated under Section 106 of the National Historic Preservation Act (NHPA) for the Manager Lanes Project, and that compliance with Section 4(f) of the Department of Transportation Act will/may also be required. Sierra Club would like to participate actively in the review process, both as a "consulting party" under Section 106 of the NHPA, pursuant to 36 C.F.R. § 800.2(c)(5), and by receiving and commenting on any documents prepared pursuant to Section 4(f).

Sierra Club's membership mission is to enjoy, explore, and protect the planet. Our outdoor programs bring people to hikes and outings across the country, from local parks, to areas of environmental and cultural significance. The Sierra Club has routinely over the years sought to protect areas for both their natural resource values and their cultural values.

For example, we recently supported national monument status for Stonewall Inn and the Cesar Chavez homestead. We just commissioned a study of the history of the John Muir Trail and its construction. Links to our press releases on several of these issues is below. Locally Sierra Club was a vocal advocate for the creation of the Harriet Tubman Underground Railroad National Historic Park and Trail.

Locally, Sierra Club has thousands of members who live around the proposed route, and our members utilize the Rock Creek Stream Valley Park and other local parks that would be impacted by the project. We are concerned about the potential impact on Rock Creek Stream Valley Park for both its ecological resources and cultural value. The creation and preservation of Rock Creek Stream Valley park was a key factor in the establishment of new institutions, such as the Maryland-National Capital Parks and Planning Commission, the establishment of the park marks a critical milestone in the land preservation movement of the time.

Because of Sierra Club's knowledge and concern about historic properties potentially affected by the project, we believe we can provide important information and a valuable perspective as a consulting party under Section 106 and in the review process under Section 4(f).

Please include Sierra Club in your distribution list for public notices of any meetings, and for the circulation of documents for comment.

We look forward to participating as the review and consultation process moves forward for the Manager Lanes process.

Sincerely,
Joshua Tulkin
Maryland Chapter Director

Links:

- Statement on creation of Stonewall National Monument
<https://content.sierraclub.org/press-releases/2016/06/sierra-club-praises-stonewall-national-monument>
- Statement on creation of Birmingham Civil Rights National Monuments: <https://www.sierraclub.org/press-releases/2017/09/sierra-club-applauds-new-national-monuments-commitments-increase-diversity>
- Blog on Pullman Historic Site: <https://blogs.sierraclub.org/layoftheland/2014/09/labor-day-2014-preserving-labors-pullman-legacy.html#more>
- Statement on [César E. Chávez National Monument](#).: <https://blogs.sierraclub.org/layoftheland/2012/10/monument-to-a-national-treasure.html>



Chesapeake & Ohio Canal Association Inc.

A citizens' association concerned with the conservation of the natural and historical environment of the C&O Canal and the Potomac River Basin

P.O. Box 366
Glen Echo, Maryland 20812
December 24, 2019

Mr. Steve Archer
Cultural Resources Team Leader
Maryland Department of Transportation
State Highway Administration
Environmental Planning Division
707 North Calvert Street
Baltimore, Maryland 21202

Dear Mr. Archer:

Thank you for including the Chesapeake & Ohio Canal Association as a consulting party in the planning for proposed changes to I-495 and I-270.

As you know, the project's Area of Potential Effects includes National Parks on both sides of the Potomac River. As our name implies, however, our primary mission is to protect the C&O Canal National Historical Park. Our attention therefore focuses on the American Legion Memorial Bridge and its approaches in Maryland. We foresee potential harm to the natural and historical values of the canal park if the project proceeds.

During the construction phase, there would be inevitable disturbance to the Park's viewsheds, tranquility, wetlands, and perhaps to its structures. We are concerned that such disturbances would be kept to a minimum if the project moves forward. During the initial construction of the Capital Beltway in the 1960s, canal Lockhouse #13, a fine stone structure dating to 1830, was razed. We and the public are even more sensitive to historical concerns today. It is our hope that complete restoration would follow any damage to structures or to the wetlands in the Potomac Valley, and that the Park would be left in at least as fine a state as before the project began.

We note in particular that preliminary plans include space for pedestrians on the new bridge. We do not see how this would connect to the neighborhoods and to the parks at either end of the bridge. It would certainly be easier to connect with the C&O Canal on the Maryland end of the bridge than to the Potomac Heritage Trail, given the difference in the vertical distances to the ground on the two ends. We look forward to seeing how park visitors might take advantage of new access points.

We also have concerns for buried resources, such as the all-too-fragile Potomac Interceptor sewage line, and hope that damage to such assets will be avoided.

The C&O Canal Association is an all-volunteer citizen organization established in 1954 to help conserve the natural and historical environment of the C&O Canal and the Potomac River Basin. The Association thanks the Maryland Department of Transportation for the opportunity to comment on this project and looks forward to an outcome that is historically, culturally, and ecologically appropriate.

Yours truly,



William R. Holdsworth
President

Appendix B

Consulting Parties List

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DRAFT

**I-495 & I-270 Managed Lanes Study
Section 106 Consulting Parties List**

Federally Recognized Tribes

- Absentee-Shawnee Tribe of Oklahoma
- Delaware Nation
- Delaware Tribe of Indians
- Chickahominy Indian Tribe
- Chickahominy Indians Eastern Division
- Eastern Shawnee Tribe of Oklahoma
- Monacan Indian Nation
- Nansemond Indian Tribe
- Oneida Indian Nation
- Onondaga Nation
- Pamunkey Indian Tribe
- Rappahannock Tribe, Inc.
- Saint Regis Mohawk Tribe
- Seneca-Cayuga Nation
- Shawnee Tribe
- Tuscarora Nation
- Upper Mattaponi Indian Tribe

State Recognized and Other Tribes

- Piscataway Conoy Tribe of Maryland (PCT)
- PCT - Cedarville Band of Piscataway
- PCT - Choptico Band of Piscataway
- Piscataway Indian Nation

Federal Agencies

- Department of Defense
- General Services Administration
- Federal Railroad Administration
- Federal Transit Administration
- National Capital Planning Commission
- National Institute of Standards and Technology
- National Park Service
- U.S. Army Corps of Engineers
- U.S. Department of Agriculture
- U.S. Postal Service

State Agencies and Organizations

- Maryland Commission on Indian Affairs
- MDOT Maryland Transit Administration
- MDOT Maryland Transportation Authority
- Maryland Historical Trust
- Preservation Maryland
- Virginia Department of Historic Resources
- Virginia Department of Transportation
- Washington Metropolitan Area Transit Authority

**I-495 & I-270 Managed Lanes Study
Section 106 Consulting Parties List**

County Agencies and Organizations

- Maryland Milestones/Anacostia Trails Heritage Area, Inc.
- Montgomery County Department of Correction and Rehabilitation
- Montgomery County Department of General Services
- Montgomery County Department of Transportation
- Montgomery County Heritage Area, Heritage Tourism Alliance of Montgomery County
- Maryland-National Capital Parks and Planning Commission – Montgomery County Planning – Historic Preservation
- Maryland-National Capital Parks and Planning Commission – Montgomery Parks
- Maryland-National Capital Parks and Planning Commission – Prince George's County Planning – Historic Preservation
- Maryland-National Capital Parks and Planning Commission – Prince George's County Department of Parks and Recreation
- Montgomery Preservation, Inc.
- Prince George's County Historic Preservation Commission
- Prince George's County Historical and Cultural Trust
- Prince George's Heritage, Inc.

Municipal Agencies and Organizations

- C&O Canal Association
- C&O Canal Trust
- Carderock Springs Citizens' Association
- City of College Park
- City of Glenarden
- City of Greenbelt
- City of Rockville
- Gibson Grove A.M.E. Zion Church
- Peerless Rockville
- Save Our Seminary at Forest Glen
- Sierra Club Maryland Chapter
- Village of North Chevy Chase

Appendix C

Programmatic Agreement Annotated Outline

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DRAFT

DRAFT – Pre-Decisional
CONCEPTUAL DISCUSSION OUTLINE
PROGRAMMATIC AGREEMENT

Among the
FEDERAL HIGHWAY ADMINISTRATION,
MARYLAND DEPARTMENT OF TRANSPORTATION STATE HIGHWAY
ADMINISTRATION,
MARYLAND STATE HISTORIC PRESERVATION OFFICER,
VIRGINIA STATE HISTORIC PRESERVATION OFFICER,
ADVISORY COUNCIL ON HISTORIC PRESERVATION

Implementing Section 106 of the National Historic Preservation Act for the
I-495 and I-270 Managed Lanes Study
Montgomery and Prince Georges Counties, Maryland and Fairfax County, Virginia

Recitals (Whereas Clauses)

This section will define the background of the project (“Undertaking”), and the intention of this agreement, including (but not limited to):

- Defining the Undertaking (the specific federal actions that may affect historic properties)
- FHWA is the lead federal agency, as designated by other agencies; execution of this agreement fulfills 106 responsibilities for the other federal agencies, etc.
- Involvement of Other Federal Agencies
- Defining the Public-Private Partnership (P3), and that the concessionaire will advance design under approval by the state.
- Review of completed steps in Section 106 process (consultation, APE, identification of properties, assessment of effect, etc.)
- Stating that historic properties will be adversely affected by the undertaking, however all effects to historic properties cannot be fully determined
- That the signatories, having involved consulting parties, have agreed that the PA and implementation of its terms of fulfill the requirements of Section 106 for the undertaking

Stipulations

1. Roles and Responsibilities

- a. **FHWA** (will describe that FHWA, as designated lead federal agency, is ultimately responsible for ensuring the terms of this agreement are carried out)
- b. **MDOT SHA** (Will describe that MDOT SHA will be responsible for implementation of stipulations of the agreement)
 - i. Concessionaire (because the Concessionaire is not selected at this time, stipulation will describe what requirements MDOT SHA will place on concessionaire through the procurement process)
 - ii. Will Retain qualified CR staff responsible for fulfilling their commitments
- c. **Other Federal Agencies** (to be determined related to level of involvement with adversely affected historic properties and mitigation implementation)
- d. **SHPOs** (will describe jurisdiction [Maryland, Virginia] and elements such as concurrence/comment decision points and anticipated review timelines)
- e. **ACHP** (will describe ACHP's role as providing policy guidance and dispute resolution/comment)
- f. **Concurring Parties/Public** (consulting parties invited to concur in the agreement may have ongoing opportunities to provide input, participate in mitigation projects, etc.; will describe mechanisms for how the general public not identified as consulting parties may engage in the future and addition of consulting/concurring parties in the future)
- 2. **Professional Standards** (will reference applicable Secretary of Interior qualifications, SHPO, National Register, ACHP and other applicable standards for evaluation and reporting for cultural resources studies)
- 3. **Project-wide Mitigation and Commitments** (may describe mitigation that addresses multiple properties, or logical groupings of affected properties, general provisions for avoidance through design refinements, context-sensitive solutions, etc.) MDOT SHA is seeking consulting party input on these measures.
- 4. **Property-Specific Mitigation and Commitments**
MDOT SHA is seeking input on potential mitigation for the properties currently identified as experiencing an adverse effect. This section will break out mitigation or other commitments specific to each property (see the preliminary list attached to this document)
- 5. **Archaeological Treatment Plan**
 - a. MDOT SHA will develop an archaeological treatment plan in consultation with relevant parties that identifies:
 - i. Areas presently inaccessible for study to be evaluated
 - ii. Treatment of determined/assumed eligible sites
 - iii. Known sites requiring further evaluation for NRHP eligibility (Phase II)

- iv. Monitoring Requirements
- v. Treatment of Cemeteries
- vi. Standardized evaluation and treatment process for newly-identified project elements, process (including consultation with relevant parties) for updates and revisions to treatment plan.

(MDOT SHA's goal is to have a comprehensive but flexible archaeological treatment plan that addresses the current LOD but can be revised and updated in response to project advancement)

6. Architectural Resources

- a. Will describe evaluation of inaccessible/unevaluated properties (MDOT SHA has to date not been granted access to the Martin-Marietta Headquarters, but anticipates evaluation of all other architectural resources identified in the Gap Analysis prior to PA completion)
- b. Will describe process for effects assessment to identified historic properties currently with "unknown" effects upon further design, or should design within the APE evolve to change effect determinations.

7. Revisions to APE in response to Design Advancement

- a. Will describe the process to revise the APE for minor changes with no potential to change or cause new effects to historic properties
- b. Will describe the consultation process on substantial APE revisions where historic properties may be additionally or differently affected.
- c. Will describe the evaluation and treatment of additional architectural resources in response to APE expansion.

8. Continued Consultation

In addition to the above, there may be ongoing consultation required for properties where effects cannot yet be fully determined, design of certain elements in proximity to historic properties (such as elevated structures), where consultation may be requested to achieve context-sensitive design and minimize effects. MDOT SHA is seeking input on those project elements where further consultation is requested and appropriate.

9. Inadvertent Discovery (Including Human Remains)

MDOT SHA has a standard procedure for all projects in the event of inadvertent discovery of human remains or archaeological resources, or inadvertent adverse effects to previously identified historic properties, that will be encapsulated here.

10. Monitoring of Performance

This section will describe how the parties will understand progress on implementation of commitments and mitigation, through regularly issued summary reports (such as annual or quarterly) and/or regularly scheduled meetings for consulting parties. MDOT SHA is seeking input on consulting party preferences for this stipulation.

11. Amendment

Will describe a standard process including consultation when amendments to the agreement are needed.

12. Dispute Resolution

Will describe a standard process for resolving objections and disputes among the parties, referencing the Amendment process if the agreement needs to be altered.

13. Termination

Will describe a standard process for termination of the agreement, and subsequent steps if termination occurs. Typically this involves a “waiting period” of consultation prior to termination, and a requirement to either negotiate a new agreement, follow the standard Section 106 process, and/or take Advisory Council comments into consideration prior to FHWA determining next steps.

14. Duration

Because of the anticipated duration of this project, and that there may be additional elements that continue, a 15 year duration may be appropriate, or until all terms of the agreement are fulfilled or the project becomes inactive; can include provisions for extension of the agreement.

Signature Pages

Signatory Parties: FHWA, MDOT SHA ACHP, MD SHPO, VA SHPO, Other Federal Agencies to Be Determined

Concurring Parties: To Be Determined

ACHP



U.S. Department
of Transportation
**Federal Highway
Administration**

Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

March 26, 2018

In Reply Refer To:
HDA-MD

Mr. John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington DC 20001-2637

Dear Mr. Fowler:

The Federal Highway Administration (FHWA), in coordination with the Maryland Department of Transportation State Highway Administration (MDOT SHA), is preparing an Environmental Impact Statement (EIS) for the I-495 & I-270 Managed Lanes Study in accordance with the National Environmental Policy Act (NEPA). FHWA published a Notice of Intent to prepare the EIS in the Federal Register on March 16, 2018. The purpose of the I-495 & I-270 Managed Lanes Study is to accommodate existing traffic and long-term traffic growth, enhance trip reliability, and improve travel choice. The study will result in an EIS which will include: scoping, purpose and need development, corridor alternative analysis and screening, traffic and environmental analyses, and public and agency involvement. The study limits encompass approximately 55 miles on I-495 (Capital Beltway), from south of the American Legion Bridge in Virginia to east of the Woodrow Wilson Bridge and on I-270 (Dwight D. Eisenhower Memorial Highway) from I-495 to I-370, including the east and west I-270 spurs in Montgomery and Prince George's Counties, Maryland. The study will include a review of existing and future traffic, roadway, and environmental conditions to identify alternatives and assess potential impacts. The attached figure (**Attachment A**) depicts the extent of the study area.

Your agency has been identified as one that may have jurisdiction by law and an interest in this project; accordingly, FHWA and MDOT SHA invite your agency to become a participating agency in the environmental review process and preparation of the Draft EIS and Final EIS for the subject project in accordance with 40 CFR 1501.6. Pursuant to 23 U.S.C. § 139, participating agencies are responsible to identify issues of concern that could substantially delay or prevent an agency from granting a permit or other approval that is needed for a project.

As a participating agency, your agency would have the following responsibilities related to its jurisdiction:

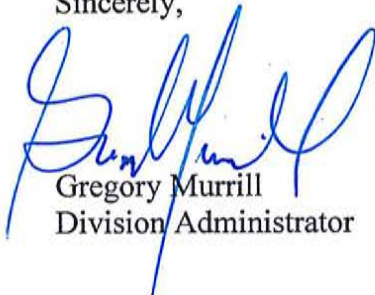
1. Identify, as early as practicable, any issues of concern regarding potential impacts on the natural or human environment.

2. Provide meaningful and early input on relevant issues such as the study purpose and need, the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
3. Participate in coordination meetings and field reviews with other environmental resource agencies as appropriate.
4. Adhere to timeframes for reviewing and commenting on administrative copies of environmental documentation, including the Draft and Final EIS.

If you are not the point of contact, please provide the appropriate contact information. Your agency may elect to accept or decline the invitation by checking the appropriate box and signing the attached agency response form (Attachment B). If your agency elects to decline this invitation, please include the reason for declining with your agency's response to the lead federal agency. The response may be transmitted electronically to the Environmental Program Manager, Ms. Jeanette Mar, at jeanette.mar@dot.gov.

Thank you in advance for your consideration, we look forward to receiving your response to our invitation to serve as a participating agency. Please respond to this invitation no later than **April 26, 2018**. If you have any questions or need additional information, please contact Ms. Mar via email at jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachments:

- A: Study Area Map
- B: Agency Response Form

cc: Ms. Caryn J. G. Brookman, MDOT SHA, P3 Environmental Manager
Ms. Lisa B. Choplin, DBIA, MDOT SHA, P3 Director
Mr. Jeff Folden, P.E, DBIA, MDOT SHA P3 Deputy Director
Ms. Sarah Stokely, ACHP, Program Analyst

Milford Wayne Donaldson, FAIA
Chairman

Leonard A. Forsman
Vice Chairman

John M. Fowler
Executive Director



Preserving America's Heritage

May 22, 2018

Ms. Brandye Hendrickson
Acting Administrator
Federal Highway Administration
1200 New Jersey Ave S.E.
Washington, D.C. 20590

Ref: *Environmental Impact Statement for the I-495 & I-270 Managed Lanes Study
Montgomery and Prince Georges County, Maryland
ACHPConnect Log Number: 12723*

Dear Ms. Hendrickson:

In response to a recent notification by the Federal Highway Administration (FHWA), in coordination with the Maryland Department of Transportation State Highway Administration (MDOT SHA), the Advisory Council on Historic Preservation (ACHP) will participate in consultation regarding the Section 106 review for the I-495 & I-270 Managed Lanes Study in Maryland. The ACHP understands that FHWA will finalize a Programmatic Agreement with the consulting parties once a preferred alternative is selected. Our decision to participate in this consultation is based on the *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, contained within the regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act. The criteria are met for this proposed undertaking because the project could have substantial impacts on important historic properties, and has the potential for presenting procedural problems.

Section 800.6(a)(1)(iii) of our regulations requires that we notify you, as the head of the agency, of our decision to participate in consultation. By copy of this letter, we are also notifying Mr. Gregory Murrill, FHWA Maryland Division Administrator, and Ms. Jeanette Mar, FHWA Maryland Division Environmental Program Manager.

Our participation in this consultation will be handled by Sarah Stokely who can be reached at 202-517-0224 or via e-mail at sstokely@achp.gov. We look forward to working with your agency and other consulting parties to consider alternatives to this undertaking that could avoid, minimize, or mitigate potential adverse effects on historic properties and to reach a resolution.

Sincerely,

John M. Fowler
Executive Director

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 • Washington, DC 20001-2637
Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

MHT and DHR

April 12, 2018

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

Introduction and Study Description

This letter serves to inform the Maryland Historical Trust (MHT) of the Maryland Department of Transportation State Highway Administration's (MDOT SHA) proposed Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The study is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland. The study limits of the initial phase, the I-495 & I-270 MLS, encompass I-495 from south of the American Legion Bridge in Fairfax County, Virginia, to east of the Woodrow Wilson Bridge and I-270 from I-495 north to I-370, including the east and west I-270 spurs along I-495. The preliminary purpose of the MLS is to accommodate existing traffic and long-term traffic growth, enhance trip reliability, and improve travel choice on I-495 and I-270, within the study limits.

As a P3 study, design and construction will be undertaken by private sector concessionaires, who will also be responsible for the ongoing operation of the improvements. Due to the nature of the P3 study delivery structure, the precise nature of the improvements will not be determined until the concessionaires have been selected and develop a solution that meets the goals of the study.

Due to the complexity of the undertaking and the design flexibility allowed by the P3 delivery method, MDOT SHA expects Section 106 review to be completed through execution of a Programmatic Agreement documenting assessment and resolution of effects to known properties and providing protocols for evaluation and resolution of effects following advancement of design. MDOT SHA will ask FHWA to notify the Advisory Council on Historic Preservation and invite their participation in the proposed Agreement.

Preliminary Area of Potential Effects

In developing a preliminary Area of Potential Effects (APE) for this study, MDOT SHA considered possible visual, audible, atmospheric and/or physical effects to historic properties,

both archaeological sites and standing structures, that would diminish the integrity of any characteristics that would qualify a property for the National Register of Historic Places (NRHP).

Because the precise limits of disturbance are unknown, MDOT SHA has developed a Corridor Study Boundary (CSB), the envelope within which improvements may occur. The CSB is defined as a line extending 300 feet from the centerline on either side of I-495 and I-270 within the study limits, as shown in Attachment 1. MDOT SHA makes the assumption at this point that the CSB represents the area where direct effects to historic properties, including archaeological resources, may occur.

To capture anticipated direct and indirect effects, the preliminary APE encompasses the CSB and extends an additional 250 feet on either side, expanding farther at certain interchanges. The CSB and APE are preliminary and subject to change as more information about the I-495 & I-270 MLS study becomes available.

Funding

Federal funds are anticipated for this study.

Identification Methods and Results

Potentially significant architectural and archaeological resources will be researched as part of the historic investigation instigated by the proposed I-495 & I-270 MLS.

Architecture: The study area is located along I-495 from south of the Potomac River to I-270 in Montgomery County, and along I-270 between its confluence with I-495 to I-370 South of Gaithersburg. Within the study limits, I-495 and I-270 are multilane divided highway that form multiple large interchanges with Maryland highways. The surrounding areas include a range of residential, commercial, and office and industrial buildings constructed from the early twentieth century up to the present. Residential dwellings include single-family houses, multi-family apartments, and townhouse communities. Commercial properties are primarily auto-oriented shopping centers, and office and industrial uses are present individually and concentrated in single-use developments. The majority of buildings are single-family houses within residential subdivisions developed between 1950 and 1980.

North, east, and south of Washington, D.C., I-495 mainly passes through and between preexisting suburban neighborhoods constructed following World War II and those built concurrently with the highway into the 1960s. Later development appears primarily in Montgomery County along the western section of the Beltway and along the I-270 corridor.

A preliminary review of MHT's Medusa database, the Maryland Inventory of Historic Properties (MIHP), the Virginia Department of Historic Resources' V-CRIS database, and property tax data has identified 35 NRHP listed or eligible properties within the APE. The APE also includes 18

properties that are listed in the MIHP but have not been evaluated for NRHP eligibility. One eligible property within the APE, the WMAL Transmittal Property (M: 30-24), was demolished in 2017. A list of eligible and unevaluated resources within the APE is provided as Attachment 2.

In addition, under Section 106 of the National Historic Preservation Act of 1966, buildings that are 50 years of age qualify to be considered for inclusion in the National Register of Historic Places (NRHP). In consideration of the study schedule, MDOT SHA intends to evaluate resources within the APE that were constructed in or prior to 1978 for NRHP eligibility to account for resources that may become eligible during the course of construction.

MDOT SHA will develop an addendum to the existing *Suburbanization Historic Context and Survey Methodology* (KCI Technologies, Inc., 2000) which covers suburban development in Montgomery and Prince George's counties up to 1960, to provide guidance for evaluating resources constructed after 1960.

As the study develops and details regarding the study limits and CSB are finalized, MDOT SHA will revise the APE accordingly and determine the extent of affected properties. MDOT SHA looks forward to coordinating with MHT and other consulting parties on this study.

Archaeology: The archaeology survey area is defined as the CSB, and is subject to change. MDOT SHA prepared a preliminary archaeological assessment, which identified 48 archaeological sites have been recorded in or within 250 m of the current archaeology survey area.

As part of the prior I-495 Capital Beltway Managed Lanes Project, the Capital Beltway was surveyed by Diamante et al. (2008), who tested two previously recorded sites and identified 9 archaeological sites and 10 isolated finds. One of two previously identified sites and one of nine newly identified archaeological sites were recommended for further archaeological investigations that did not occur at that time.

Within the archaeology survey area, the preliminary assessment identified at least 49 discrete areas that appear to be undisturbed and warrant additional archaeological investigation (including inaccessible parcels identified by Diamante et al. 2008). Stormwater, wetland, reforestation, and other environmental stewardship and mitigation sites have not yet been identified, and additional areas requiring archaeological survey may be identified as the study is refined. In addition, the following archaeological resources may require further archaeological investigations; MDOT SHA will consult with MHT and appropriate consulting parties as we develop the scope of work for these resources.

- Previously recorded Site 18MO514 is within the National Register listed National Park Seminary Historic District (M:36-01) and determination of the eligibility of its archaeological component was beyond the scope of the investigation by Diamante et al. (2008).

- Site 18PR750 may be eligible for the National Register of Historic Places and Phase II testing is warranted to evaluate significance.
- The Montgomery County Poor Farm (18MO514) along I-270 should be evaluated for the possible presence of human remains associated with the cemetery.
- The Walker Family Cemetery (PG:67-3), located along the Capital Beltway immediately south of MD 201, is part of the NRHP listed Greenbelt Historic District.
- The C&O Canal National Historic Park (NR-12), including Canal Locks 12 through 14, is a National Historic Landmark property.

MDOT SHA will continue to consult with MHT and other consulting parties as the study evolves.

Review Request

Please examine the attached APE map (**Attachment 1**). We request your comments by May 11, 2018 on MDOT SHA's proposed I-495 and I-270 MLS. By carbon copy, we are inviting the relevant agencies, local government representatives, and historic groups (Attachment 3) to provide comments and participate in the Section 106 process. Federally recognized tribes will also be invited to consult.

MDOT SHA also looks forward to coordination with the Virginia Department of Transportation and the Virginia Department of Historical Resources for the portion of the study within Virginia jurisdiction.

Pursuant to the requirements of the implementing regulations found at 36 CFR Part 800, MDOT SHA seeks the attached parties' assistance in identifying historic preservation issues as they relate to this specific study (see 36 CFR §800.2(c)(3) and (5), and §800.3(f) for information regarding the identification and participation of consulting parties, and §800.4, and §800.5 regarding the identification of historic properties and assessment of effects). For additional information regarding the Section 106 regulations, see the Advisory Council on Historic Preservation's website, www.achp.gov, or contact MDOT SHA or MHT. If you do not wish to consult on this study, please notify MDOT SHA.

MDOT SHA proposes to hold a consulting parties kickoff meeting at 11 a.m. on May 3, 2018 at the P3 Study Office located at 601 N. Calvert Street in Baltimore and invites all consulting parties to attend. If you are unable to attend the meeting but wish to receive information, please feel free to contact MDOT SHA using the contact information below.

Please contact Cultural Resources Team Leader Steve Archer (410-545-8508 or email sarcher@sha.state.md.us) for general questions about the Section 106 process for this study. Matt Manning may be reached at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures, and Richard Ervin may be reached at 410-545-2878 (or via email at rervin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Five

Sincerely,



Digitally signed by Steve Archer
DN: cn=Steve Archer,
o=Maryland State Highway
Administration, ou=Cultural
Resources Section/
Environmental Planning
Division,
email=SArcher@sha.state.md.us,
c=US

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc:

Ms. Julie Langan, Virginia State Historic Preservation Officer
Ms. Jeanette Mar, Environmental Manager, FHWA
Lisa B. Choplin, DBIA, Director, I-495 & I-270 P3 Office, MDOT SHA
Jeffrey Folden, P.E., DBIA, Deputy Director, I-495 & I-270 P3 Office, MDOT SHA (w/
Attachments)
Ms. Caryn Brookman, Environmental Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD

201802131

F
FHWA
TJT/
EJC

**Concurrence with the MD State Highway Administration's
Area of Potential Effects**

Project Number: AW073A11 MHT Log No. 201802131
Project **I-495 & I-270 Managed Lanes Study**
County: **Montgomery and Prince George's**
Letter Date: April 16, 2018

The Maryland Historical Trust has reviewed the documentation attached to the referenced letter and concurs with the MD State Highway Administration's determinations as follows:

Appropriate Area of Potential Effects (Attachment 1)

☒ Concur
☐ Do Not Concur

Eligibility (as noted in the Eligibility Table [N/A]):

☐ Concur
☐ Do Not Concur

Effect (as noted in the Effects Table [N/A]):

☐ No Properties Affected
☐ No Adverse Effect
☐ Conditioned upon the following action(s) (see comments below)
☐ Adverse Effect

Comments:

By:

Jim Taubman
MD State Historic Preservation Office/
Maryland Historical Trust

Date

5/17/18

Return by U.S. Mail or Facsimile to

Dr. Julie M. Schablitsky, Assistant Division Chief, Environmental Planning Division,
MD State Highway Administration, P.O. Box 717, Baltimore, MD 21203-0717
Telephone: 410-545-8870 and Facsimile: 410-209-5046

A-Proj #x Ervin/Manning

Cc: Ervin
Manning
Brookman

August 8, 2018

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion the enclosed *Archaeological and Historic Architectural Gap Analysis and Assessment* (Gap Analysis) associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland. MDOT SHA notified MHT of the study in an initiation letter dated April 12, 2018.

The Gap Analysis provides an inventory of recorded historical resources within the study area and identifies unsurveyed areas requiring archaeological investigation and architectural resources constructed in or before 1978. The Gap Analysis does not include cultural resources along the Virginia segment of the I-495 & I-270 MLS. The Virginia Department of Transportation will address inventory of historic properties for both archaeology and historic architecture in Virginia as part of the agency's ongoing project to extend the American Legion Memorial Bridge High Occupancy Toll (HOT) Lanes to the George Washington Parkway.

MDOT SHA's archaeological gap analysis identified 54 previously unsurveyed areas totaling 268 acres. Of those areas, 37 are recommended for full Phase I archaeological survey, and 17 are recommended for limited archaeological survey to assess integrity.

The architectural analysis identified 33 previously recorded National Register of Historic Places (NRHP)-eligible historic properties, including 11 that are listed on the NRHP. A total of 288 newly identified resources encompassing buildings, districts, parks, and linear resources, require evaluation for NRHP eligibility. MDOT SHA will evaluate these properties using a combination of regular Determination of Eligibility (DOE) forms, short forms, and MIHP Addendum forms.


Although not addressed in the gap analysis, MDOT SHA will work with consulting parties to identify any additional historic property types such as traditional cultural properties (TCPs) or cultural landscapes, as the project moves forward.

Ms. Elizabeth Hughes
Page Two

In the interest of streamlining and reducing costs to the state in the documentation of the numerous architectural resources, MDOT SHA proposes using the I-495 & I-270 MLS as a pilot to submit DOE forms without archival prints. Digital photos will include labels generated in white space below the image, as shown in the attached example (Attachment 2). This format ensures the legibility of photo labels. This digital labeling method meets National Park Service standards and has been accepted by the Virginia and Delaware SHPOs. MDOT SHA will maintain the original digital photos in TIFF format should MHT later request archival prints.

Please examine the attached Archaeological and Historic Architectural Gap Analysis and Assessment (Attachment 1). We request your comments by September 8, 2018 on MDOT SHA's Gap Analysis for the I-495 & I-270 MLS, and MHT's response regarding photo standards and labeling. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Sincerely,

 Digitally signed by Steve Archer
DN: cn=Steve Archer, o=Maryland
State Highway Administration,
ou=Cultural Resources Section/
Environmental Planning Division,
email=SArcher@sha.state.md.us,
c=US

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Caryn Brookman, Environmental Manager, I-495 & I-270 P3 Office, MDOT SHA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

October 19, 2018

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion the enclosed *Suburbanization Historic Context Addendum (1961-1980), Montgomery and Prince George's Counties, Maryland* (Context Addendum) and Batch 1 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland. MDOT SHA provided MHT with the Gap Analysis and Area of Potential Effects (APE) associated with the study in a letter dated August 8, 2018.

The Context Addendum supplements the original 1999 *Suburbanization Historic Context and Survey Methodology* prepared by KCI Technologies, Inc., and describes historical trends, property types, and significance assessment considerations for properties dating from the 1960-1980 period in Montgomery and Prince George's counties.

Batch 1 of MDOT SHA's historic architecture evaluations includes 15 resources within the MLS Study APE that were previously identified in the Maryland Inventory of Historic Properties. These resources were evaluated using 11 Determination of Eligibility (DOE) forms and 4 MIHP Addendum forms. MDOT SHA has determined that none of the properties evaluated in Batch 1 is eligible for the National Register of Historic Places (NRHP).

DOE Forms

M: 26-10-56	Reiche Cottage Stone House
M: 26-52	626 Great Falls Road
M: 29-42	Stoneyhurst Quarries
M: 30-17	Montgomery Bean House
M: 36-38	Forest Grove Neighborhood
M: 36-71	Montgomery Hills Baptist Church
PG:69-000	New Carrollton
PG:76A-31	John and Marie Darcey Houses

Ms. Elizabeth Hughes
Page Two

PG:76A-30 Linda Holmes House
PG:71A-54 Baltimore and Potomac RR, Washington City Branch District
PG:LAU-29 Baltimore and Ohio RR, Washington Branch District


MIHP Addendum Forms

M: 30-24 WMAL Transmitter Property
PG:73-22 4509 Jefferson Street
PG:73-23 8906 Ardwick-Ardmore Road
PG:73-24 4403 Jefferson Street

The Batch 1 submittal includes printed forms for each resource and an archival DVD with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled between March and June 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Context Addendum (Attachment 1), Batch 1 (Attachment 2), and Eligibility Table (Attachment 3). We request your comments by November 24, 2018, on MDOT SHA's Context Addendum. We also request your concurrence with MDOT SHA's Batch 1 eligibility determinations. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Sincerely,

 Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30105

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility/Status Table

Attachment #3

Project Name:

October 18, 2018

Resource	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-10-56 Reiche Cottage Stone House	S	X	Req. 11/2018	2	DOE
M: 26-52 626 Great Falls Road	S	X	Req. 11/2018	2	DOE
M: 29-42 Stoneyhurst Quarries	S	X	Req. 11/2018	2	DOE
M: 30-17 Montgomery Bean House	S	X	Req. 11/2018	2	DOE
M: 36-38 Forest Grove Neighborhood	HD	X	Req. 11/2018	2	DOE
M: 36-71 Montgomery Hills Baptist	S	X	Req. 11/2018	2	DOE
PG:69-000 New Carrollton	HD	X	Req. 11/2018	2	DOE
PG:76A-31 John and Marie Darcey Houses	S	X	Req. 11/2018	2	DOE
PG:76A-30 Linda Holmes House	S	X	Req. 11/2018	2	DOE
M: 30-24 WMAL Transmitter Property	S	X	Req. 11/2018	2	Addendum – demolished; NR 2000
PG:73-22 4509 Jefferson Street	S	X	Req. 11/2018	2	Addendum
PG:73-23 8906 Ardwick-Ardmore Road	S	X	Req. 11/2018	2	Addendum
PG:73-24 4403 Jefferson Street	S	X	Req. 11/2018	2	Addendum

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

November 27, 2018

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Montgomery and Prince George's Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the draft *Archaeological and Historic Architectural Gap Analysis and Assessment* (Gap Analysis) and the draft *Suburbanization Historic Context Addendum (1961-1980)* (MDOT 2018) prepared for the above-referenced undertaking. We would like to acknowledge the vast amount of research and field work conducted to compile a thorough historical context for this complex project area. We believe this work will facilitate project planning, future intensive survey efforts and the eventual development of a Programmatic Agreement (PA). We are providing our specific comments on the two draft reports in accordance with Section 106 of the National Historic Preservation Act.

Comments on the Gap Analysis: Trust staff reviewed the following document, *Archaeological and Historic Architectural Gap Analysis and Assessment* (July 2018) prepared by RK&K for MDOT SHA. Also, we met with MDOT SHA staff on April 18, 2018 to discuss the project's methodology. In general, we believe that the document proposes a reasonable and appropriate level of effort to complete the identification of historic and archeological properties within the current area of potential effects (APE), given the project scope and concentration of possible resources in the area. We have a few minor comments on the identification strategy. For the archeology efforts, we encourage team to utilize the Maryland Archeological Synthesis Project data to assist in developing defensible evaluations of National Register eligibility and placing sites within a broader context by region or site type. For architecture, the Trust does not recommend the survey and evaluation of electrical infrastructure. There is no need to evaluate the two linear power transmission lines with the project's APE.

Comments on the Suburbanization Historic Context Addendum (1961-1980): As mentioned above, this historic context addendum provides valuable information and insight into mid-twentieth century development trends within Maryland and will serve as a useful tool in the evaluation of the historic built environment for this study.

The context presents a comprehensive discussion of overall mainstream suburban development trends. However, the context should include further analysis of national and local trends, such as the sweeping authority of federal housing regulations and the suburban experience of local historically marginalized populations. For example, we learned that much of Maryland's suburban built environment in the mid-twentieth century was shaped by increasing influence of government regulators and planners at the federal, state and local levels. This context report excels when discussing the specific governmental policies and programs that affected development trends and directly impacted the physical character and social composition of communities during the period. This discussion could benefit from additional

examination of how these laws directly influenced settlement patterns and the appearance of our suburban landscape. Most importantly, the report should include examples of how this phenomenon is expected to be represented in the local built environment.

The context addendum is a valuable tool for identifying historic properties within Maryland's ubiquitous mid-twentieth century suburban landscape. As additional knowledge is gained through fieldwork and research, we hope that the discussion of expected resource types and significance assessments can be further refined to provide examples and greater specificity. It would be helpful to identify the earliest examples of resource types and the anticipated construction date ranges for building types. Also, how is the suburban experience of historically excluded and marginalized groups manifested in the built environment? This information will aid in the identification of properties with the potential for representing important themes within this context report.

We look forward to ongoing coordination with MDOT SHA, FHWA, and the other consulting parties moving forward with implementation and review of the survey and evaluation efforts. Given the magnitude of survey efforts and level of consulting party involvement in the project, we strongly advocate that MDOT SHA provide the opportunity for consulting parties to view and provide input on the identification results concurrent with review by the Trust.

If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov / 410-697-9589 or Beth Cole (for archeology) at beth.cole@maryland.gov / 410-697-9541. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201804336&201805587

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

December 21, 2018

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 1”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 9 DOE forms and 4 MIHP Addenda represents the first batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study planning study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The following properties are not eligible for listing in the National Register:

MIHP No. M: 26-10-56 Reiche Cottage Stone House
MIHP No. M: 26-52 626 Great Falls Road
MIHP No. M: 29-42 Stoneyhurst Quarries
MIHP No. M: 30-17 Montgomery Bean House
MIHP No. M: 36-38 Forest Grove Neighborhood
MIHP No. M: 36-71 Montgomery Hills Baptist Church
MIHP No. PG:69-000 New Carrollton
MIHP No. PG:76A-31 John and Marie Darcey Houses
MIHP No. PG:76A-30 Linda Holmes House

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses.

If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov / 410-697-9589 or me (for archeology) at beth.cole@maryland.gov / 410-697-9541. Thank you for providing us this opportunity to comment.

Sincerely,



Beth Cole
Administrator, Project Review & Compliance

EH/BC/TJT/201805587

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

December 7, 2018

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 2 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

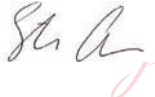
Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that 9 of the 16 properties evaluated in this submittal are eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled between March and June 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 2 eligibility determinations by January 7, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed by
Steve Archer
Adobe Acrobat
version:
2017.011.30106

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1

Project Name: I-495 & I-270 MLS - Batch 2

December 7, 2018

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 21-281	Londonderry Apartments and Towers	HD	X	Req. 1/2019	2	DOE
M: 26-71	Woodley Gardens	HD	NR	Req. 1/2019	2	DOE
M: 26-72	70-S Industrial Park	HD	X	Req. 1/2019	2	DOE
M: 26-72-1	Ward Building	S	NR	Req. 1/2019	2	DOE
M: 29-59-1	Greenfield House	S	X	Req. 1/2019	2	DOE
M: 29-69	Olde Carderock	HD	X	Req. 1/2019	2	DOE
M: 30-38	Academy Woods	HD	NR	Req. 1/2019	2	DOE
M: 30-39	Grosvenor Park	HD	NR	Req. 1/2019	2	DOE
M: 30-40	Marriott International Corporate Headquarters**	S	NR	Req. 1/2019	2	DOE
M: 31-71	Washington, DC Temple (Church of Jesus Christ of Latter-Day Saints)	S	NR	Req. 1/2019	2	DOE
M: 35-193	The Promenade	S	X	Req. 1/2019	2	DOE
PG:LAU-29	Baltimore and Ohio (B&O) Railroad, Washington Branch	S	NR	Req. 1/2019	2	DOE
PG:70-101	Gould Building	S	X	Req. 1/2019	2	DOE
PG:71A-54	Baltimore & Potomac Railroad, Washington City Branch (Pennsylvania Railroad, Baltimore and Potomac Division)	S	NR	Req. 1/2019	2	DOE
PG:72-26	Town of Glenarden	HD	NR	Req. 1/2019	2	DOE
PG:73-26	Town of Glenarden	HD	NR	Req. 1/2019	2	DOE
PG:76A-60	National Oceanic and Atmospheric Administration (NOAA) World Weather Building	S	X	Req. 1/2019	2	DOE

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

****Although construction began in 1978, Marriott HQ was not opened until early 1979. For the purposes of evaluation, MDOT SHA considers this building to fall within the 40 year period identified in the Gap Analysis.**

February 22, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 2”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 16 DOE forms represents the second batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following properties are eligible for listing in the National Register:

MIHP No. M: 26-71 Woodley Gardens
MIHP No. PG:LAU-29 Baltimore & Ohio Railroad, Washington Branch
MIHP No. PG:71A-54 Baltimore & Potomac Railroad, Washington City Branch
MIHP No. PG:72-26 Town of Glenarden

As you know, the National Register Criteria for Evaluation exclude properties that achieved significance within the past fifty years unless they are of exceptional importance, and therefore, meet National Register Criteria Consideration G. Several of the properties evaluated within Batch 2 of this study are less than fifty years old and do not meet the requirements of Criteria Consideration G. However, these properties will reach or surpass the fifty-year age threshold during the duration of the undertaking and they represent important themes identified in the *Suburbanization Historic Context Addendum (1961-1980)* (MDOT 2018). Therefore, we concur with MDOT SHA that the following properties will be treated as National Register-eligible solely for the purposes of the I-495 & I-270 Managed Lanes Study:

MIHP No. M: 26-72-1 Ward Building
MIHP No. M: 30-38 Academy Woods
MIHP No. M: 30-39 Grosvenor Park
MIHP No. M: 31-71 Washington DC Temple

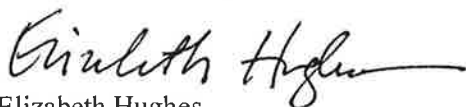
The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

MIHP No. M: 21-281 Londonderry Apartments and Towers
MIHP No. M: 26-72 70-S Industrial Park
MIHP No. M: 29-59-1 Greenfield House
MIHP No. M: 29-69 Olde Carderock
MIHP No. M: 35-193 The Promenade
MIHP No. PG:70-101 Gould Building
MIHP No. PG:76A-60 NOAA World Weather Building

MIHP No. M: 30-40 Marriott International Corporate Headquarters – The Trust does not concur with MDOT SHA's recommendation that this property is eligible for the National Register under Criterion C. The property primarily reflects an expansion of the facility during the mid-1980s. Since the majority of the property will not reach the fifty-year age threshold during the project planning study, it is the Trust's opinion that the property is not eligible for the National Register.

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov.
Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201806345

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

January 7, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 3 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that 4 of the 18 properties evaluated in this submittal are eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled between March and June 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 3 eligibility determinations by February 7, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed by
Steve Archer
Adobe Acrobat
version:
2017.011.30110

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1

Project Name: I-495 & I-270 MLS - Batch 3

January 2, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 21-282	Brighton Village East	HD	X	Req. 2/2019	2	DOE
M: 21-283	Brighton West Condominiums	HD	X	Req. 2/2019	2	DOE
M: 21-284	Fireside Condominiums	HD	X	Req. 2/2019	2	DOE
M: 26-73	Tracor Applied Sciences	S	X	Req. 2/2019	2	DOE
M: 31-72	Cedar Lane Unitarian Church	S	NR	Req. 2/2019	2	DOE
M: 31-73	Phillips House	S	X	Req. 2/2019	2	DOE
M: 33-31	Washington Coca-Cola Bottling Plant (Silver Spring)	S	NR	Req. 2/2019	2	DOE
M: 35-194	Carderock Springs South	HD	NR	Req. 2/2019	2	DOE
M: 35-195	Prelude	HD	X	Req. 2/2019	2	DOE
M: 37-35	Good Shepherd United Methodist Church	S	X	Req. 2/2019	2	DOE
PG:67-40-1	Maryland State Savings and Loan Association (Greenbelt)	S	X	Req. 2/2019	2	DOE
PG:72-26	New Carrollton Metrorail Station and Yard	HD	NR	Req. 2/2019	2	DOE
Short	722 W. Montgomery Avenue	S	X	Req. 2/2019	2	Short
Short	6940 Seven Locks Road	S	X	Req. 2/2019	2	Short
Short	7205 Longwood Drive	S	X	Req. 2/2019	2	Short
Short	10316 Fleming Avenue	S	X	Req. 2/2019	2	Short
Short	First Baptist Church of Rockville	S	X	Req. 2/2019	2	Short
Short	Rockville Christian Church	S	X	Req. 2/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Secretary
Sandy Schrader, Deputy Secretary

February 22, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 3”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 18 DOE forms represents the third batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following properties are eligible for listing in the National Register:

MIHP No. M: 31-72 Cedar Lane Unitarian Church
MIHP No. M: 33-31 Washington Coca-Cola Bottling Plant Silver Spring
MIHP No. M: 35-194 Carderock Springs South

As you know, the National Register Criteria for Evaluation exclude properties that achieved significance within the past fifty years unless they are of exceptional importance, and therefore, meet National Register Criteria Consideration G. One of the properties evaluated within Batch 3 of this study is less than fifty years old and does not meet the requirements of Criteria Consideration G. However, this property will reach or surpass the fifty-year age threshold during the duration of the undertaking and it represents important themes identified in the Suburbanization Historic Context Addendum (1961-1980) (MDOT 2018). Therefore, we concur with MDOT SHA that the following property will be treated as National Register-eligible solely for the purposes of the I-495 & I-270 Managed Lanes Study:

MIHP No. PG:72-76 New Carrollton Metrorail Station and Yard

The Trust concurs that the following properties are not eligible for listing in the National Register:

MIHP No. M: 21-282 Brighton Village East
MIHP No. M: 21-283 Brighton West Condominiums
MIHP No. M: 21-284 Fireside Condominiums
MIHP No. M: 26-73 Tracor Applied Sciences
MIHP No. M: 31-73 Phillips House
MIHP No. M: 35-195 Prelude
MIHP No. M: 37-35 Good Shepherd Methodist Church
MIHP No. PG:67-40-1 MD State Saving & Loan Association (Greenbelt)
Rockville Christian Church, 301 Adclare Road
First Baptist Church of Rockville, 55 Adclare Road
10316 Fleming Avenue, Bethesda
7205 Longwood Drive, Bethesda
6940 Seven Locks Road, Cabin John
722 W. Montgomery Avenue, Rockville

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov.
Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201806345

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)
Jim Ashe (WMATA)

February 7, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 4 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.


Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that one of the 28 properties evaluated in this submittal is eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled between March and June 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 4 eligibility determinations by March 7, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed by
Steve Archer
Adobe Acrobat
version:
2017.011.30113

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1

Project Name: I-495 & I-270 MLS - Batch 4

February 6, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-74	Briarglen	HD	X	Req. 3/2019	2	DOE
M: 26-75	Markwood	HD	X	Req. 3/2019	2	DOE
M: 26-77	Saddlebrook	HD	X	Req. 3/2019	2	DOE
M: 26-78	Roxboro	HD	X	Req. 3/2019	2	DOE
M: 29-70	Congressional Country Club Estates	HD	X	Req. 3/2019	2	DOE
M: 29-71	Seven Locks Hills	HD	X	Req. 3/2019	2	DOE
M: 29-72	Burning Tree Estates	HD	X	Req. 3/2019	2	DOE
M: 30-41	Fernwood Estates	HD	X	Req. 3/2019	2	DOE
M: 30-42	Georgetown Village	HD	X	Req. 3/2019	2	DOE
M: 30-43	North Bethesda Grove	HD	X	Req. 3/2019	2	DOE
M: 30-44	Ashburton	HD	X	Req. 3/2019	2	DOE
M: 35-196	Arrowood	HD	X	Req. 3/2019	2	DOE
M: 35-197	Bethesda Overlook	HD	X	Req. 3/2019	2	DOE
M: 35-198	Bradley Manor	HD	X	Req. 3/2019	2	DOE
M: 35-199	Hawley Estate	S	NR	Req. 3/2019	2	DOE
M: 35-200	Persimmon Tree	HD	X	Req. 3/2019	2	DOE
M: 35-201	St. Jane Frances de Chantal Church and St. Jane de Chantal School	S	X	Req. 3/2019	2	DOE
	Best Western Capital Beltway	S	X	Req. 3/2019	2	Short
	Best Western Plus Rockville Hotel and Suites	S	X	Req. 3/2019	2	Short
	Bethesda Fire Department 26	S	X	Req. 3/2019	2	Short
	Geico Materials Center	S	X	Req. 3/2019	2	Short
	Holiday Inn Washington College Park	S	X	Req. 3/2019	2	Short
	Red Lobster (Gaithersburg)	S	X	Req. 3/2019	2	Short
	Rockville Nursing Home	S	X	Req. 3/2019	2	Short
	Xerox Data Systems (BioMed Realty Trust)	S	X	Req. 3/2019	2	Short
	7401 Bradley Boulevard	S	X	Req. 3/2019	2	Short
	7415 Bradley Boulevard	S	X	Req. 3/2019	2	Short
	7330 Arrowood Road	S	X	Req. 3/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

March 26, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 4”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 28 DOE forms represents the fourth batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following property is eligible for listing in the National Register:
MIHP No. M: 35-199 Hawley Estate (Federation of American Societies for Experimental Biology)

The Trust concurs that the following properties are not eligible for listing in the National Register:

MIHP No. M: 26-74 Briarglen
MIHP No. M: 26-75 Markwood
MIHP No. M: 26-77 Saddlebrook
MIHP No. M: 26-78 Roxboro
MIHP No. M: 29-70 Congressional Country Club Estates
MIHP No. M: 29-71 Seven Locks Hills
MIHP No. M: 29-72 Burning Tree Estates
MIHP No. M: 30-41 Fernwood Estates
MIHP No. M: 30-42 Georgetown Village
MIHP No. M: 30-43 North Bethesda Grove
MIHP No. M: 30-44 Ashburton
MIHP No. M: 35-196 Arrowood
MIHP No. M: 35-197 Bethesda Overlook

MIHP No. M: 35-198 Bradley Manor
MIHP No. M: 35-200 Persimmon Tree
MIHP No. M: 35-201 St. Jane Frances de Chantal Church and St. Frances de Chantal School
7330 Arrowood Road
7401 Bradley Boulevard
7415 Bradley Boulevard
Best Western Capital Beltway
Best Western Plus Rockville Hotel & Suites
Bethesda Fire Department 26
Geico Materials Management Center
Holiday Inn Washington College Park
Red Lobster (Gaithersburg)
Rockville Nursing Home
Xerox Data Systems (BioMed Realty Trust)

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov.
Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201900558

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

March 8, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 5 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.


Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that none of the properties evaluated in this submittal are eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, expected around June 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 5 eligibility determinations by April 9, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30127

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1

Project Name: I-495 & I-270 MLS - Batch 5

March 8, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-76	Rockshire Village	HD	X	Req. 4/2019	2	DOE
M: 26-79	Fallswood	HD	X	Req. 4/2019	2	DOE
M: 26-80	North Farm	HD	X	Req. 4/2019	2	DOE
M: 26-81	West End Park Section 2	HD	X	Req. 4/2019	2	DOE
M: 29-73	Montgomery Mall (Westfield Montgomery)	HD	X	Req. 4/2019	2	DOE
M: 29-74	Seven Locks Manor	HD	X	Req. 4/2019	2	DOE
M: 29-75	Watkins Glen	HD	X	Req. 4/2019	2	DOE
M: 29-76	Wildwood Hills	HD	X	Req. 4/2019	2	DOE
M: 30-45	Alta Vista Gardens	HD	X	Req. 4/2019	2	DOE
M: 30-46	Windermere	HD	X	Req. 4/2019	2	DOE
M: 30-47	John Henry O'Neale House	S	X	Req. 4/2019	2	DOE
M: 30-48	Montrose Woods	HD	X	Req. 4/2019	2	DOE
M: 30-49	Stratton Commons	HD	X	Req. 4/2019	2	DOE
M: 30-50	Stratton Woods	HD	X	Req. 4/2019	2	DOE
M: 30-51	Tusculum and Grubby Thicket	HD	X	Req. 4/2019	2	DOE
M: 30-52	Wildwood Knolls	HD	X	Req. 4/2019	2	DOE
M: 30-53	Wildwood Manor	HD	X	Req. 4/2019	2	DOE
M: 33-32	Hillandale Shopping Center	HD	X	Req. 4/2019	2	DOE
M: 35-202	Tusculum Woods	HD	X	Req. 4/2019	2	DOE
M: 35-203	Linden Hill Towers	S	X	Req. 4/2019	2	DOE
PG:70-102	Dresden Green	HD	X	Req. 4/2019	2	DOE
PG:70-103	Whitfield Woods	HD	X	Req. 4/2019	2	DOE
PG:72-77	Ardwick Industrial District	HD	X	Req. 4/2019	2	DOE
	2406 Muskogee Street	S	X	Req. 4/2019	2	Short
	2407 Muskogee Street	S	X	Req. 4/2019	2	Short
	3315 Glenmoor Drive	S	X	Req. 4/2019	2	Short

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
	4 Choke Cherry Road	S	X	Req. 4/2019	2	Short
	Bowlmor Rockville	S	X	Req. 4/2019	2	Short
	Christman Park	S	X	Req. 4/2019	2	Short
	CIESBD Thrift Store and Office	S	X	Req. 4/2019	2	Short
	College Park Animal Hospital	S	X	Req. 4/2019	2	Short
	Comfort Zone	S	X	Req. 4/2019	2	Short
	Hillandale Center	S	X	Req. 4/2019	2	Short
	Hollywood Square	S	X	Req. 4/2019	2	Short
	Holy Cross Hospital	S	X	Req. 4/2019	2	Short
	Interstate Corporation	S	X	Req. 4/2019	2	Short
	Just Tires (Hyattsville)	S	X	Req. 4/2019	2	Short
	Life Time Athletic (Potomac)	S	X	Req. 4/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

April 17, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 5”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 38 DOE forms represents the fifth batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

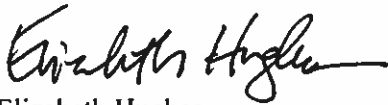
The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

MIHP No. M: 26-76 Rockshire Village
MIHP No. M: 26-79 Fallswood
MIHP No. M: 26-80 North Farm
MIHP No. M: 26-81 West End Park Section 2
MIHP No. M: 29-73 Montgomery Mall (Westfield Montgomery)
MIHP No. M: 29-74 Seven Locks Manor
MIHP No. M: 29-75 Watkins Glen
MIHP No. M: 29-76 Wildwood Hills
MIHP No. M: 30-45 Alta Vista Gardens
MIHP No. M: 30-46 Windermere
MIHP No. M: 30-47 John Henry O’Neale House
MIHP No. M: 30-48 Montrose Woods
MIHP No. M: 30-49 Stratton Commons
MIHP No. M: 30-50 Stratton Woods
MIHP No. M: 30-51 Tusculum and Grubby Thicket
MIHP No. M: 30-52 Wildwood Knolls

MIHP No. M: 30-53 Wildwood Manor
MIHP No. M: 33-32 Hillandale Shopping Center
MIHP No. M: 35-202 Tusculum Woods
MIHP No. M: 35-203 Linden Hill Towers
MIHP No. PG:70-102 Dresden Green
MIHP No. PG:70-103 Whitfield Woods
MIHP No. PG:72-77 Ardwick Industrial District
2406 Muskogee Street
2407 Muskogee Street
3315 Glenmoor Drive
4 Coke Cherry Road
Bowlmor Rockville
Christman Park
CIESBD Thrift Store and Office Building
College Park Animal Hospital
Comfort Zone
Hillandale Center
Hollywood Square
Holy Cross Hospital
Interstate Corporation
Just Tires (Hyattsville)
Life Time Athletic (Potomac)

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201901035

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

April 8, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 6 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

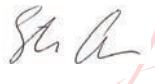
Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that 1 of the 37 properties evaluated in this submittal is eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled for August 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 6 eligibility determinations by May 8, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed
by Steve Archer
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version:
2017.011.30127

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1

Project Name: I-495 & I-270 MLS - Batch 6

April 8, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 20-50	Shady Grove Development Park, Parcel 2	S	X	Req. 5/2019	2	DOE
M: 26-82	Montgomery County Detention Center and Rockville Police Station (District 1)	S	X	Req. 5/2019	2	DOE
M: 29-77	Willerburn Acres	HD	X	Req. 5/2019	2	DOE
M: 30-54	Old Farm	HD	X	Req. 5/2019	2	DOE
M: 31-74	Forest Glen Knolls	HD	X	Req. 5/2019	2	DOE
M: 31-75	Forest Glen Road Houses	HD	X	Req. 5/2019	2	DOE
M: 31-76	Carolyn Hill Apartments	S	X	Req. 5/2019	2	DOE
M: 32-35	Argyle Forest South Section	HD	X	Req. 5/2019	2	DOE
M: 32-36	Franklin Knolls	HD	X	Req. 5/2019	2	DOE
M: 33-33	Hampshire Forest	HD	X	Req. 5/2019	2	DOE
M: 33-34	Holly Hall Apartments	S	X	Req. 5/2019	2	DOE
M: 33-35	Hillandale Forest	HD	X	Req. 5/2019	2	DOE
PG:65-54						
M: 35-204	Wolfe's Subdivision	HD	X	Req. 5/2019	2	DOE
M: 36-87	Rock Creek Stream Valley Park, Units 2 and 3	HD	NR	Req. 5/2019	2	DOE
M: 36-94	Forest Glen Park	HD	X	Req. 5/2019	2	DOE
M: 36-95	Northmont	HD	X	Req. 5/2019	2	DOE
M: 37-36	Greenwich Woods	HD	X	Req. 5/2019	2	DOE
PG:65-55						
PG:65-50	Adelphi Forest	HD	X	Req. 5/2019	2	DOE
PG:65-51	Holly Hill Manor	HD	X	Req. 5/2019	2	DOE
PG:65-52	Holly Hill Terrace	HD	X	Req. 5/2019	2	DOE
PG:65-53	Knollwood	HD	X	Req. 5/2019	2	DOE

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach	Remarks
M: 37-15	Oakview	S	X	Req. 5/2019	2	Addendum
-	9601 Parkwood Drive	S	X	Req. 5/2019	2	Short
-	9816 Riggs Road	S	X	Req. 5/2019	2	Short
-	10001-10013 Rhode Island Avenue	S	X	Req. 5/2019	2	Short
-	D & F Construction Warehouse	S	X	Req. 5/2019	2	Short
-	Former Amoco Gas and Service Station (Forest Glen)	S	X	Req. 5/2019	2	Short
-	Former Co-op Gas and Service Station (Greenbelt)	S	X	Req. 5/2019	2	Short
-	Holly View Apartments	S	X	Req. 5/2019	2	Short
-	Industrial Bank	S	X	Req. 5/2019	2	Short
-	Lanham Strip Center	S	X	Req. 5/2019	2	Short
-	Montgomery County Division of Facilities Management	S	X	Req. 5/2019	2	Short
-	Montgomery County Public Schools Transportation and Facilities Maintenance Bethesda Depot	S	X	Req. 5/2019	2	Short
-	Seven Locks Plaza (Potomac Woods Plaza)	S	X	Req. 5/2019	2	Short
-	Silver Spring Volunteer Fire Station 16	S	X	Req. 5/2019	2	Short
-	Strip Center, 9002 Lanham Severn Road	S	X	Req. 5/2019	2	Short
-	Texaco/Exxon Gas Station (Suitland)	S	X	Req. 5/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

May 30, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 6”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 37 DOE forms represents the sixth batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following property is eligible for listing in the National Register:
MIHP No. M: 36-87 Rock Creek Stream Valley Park, Units 2 and 3; This property is National Register-eligible under Criterion A, however, the B&O Railroad Trestle Bridge (MIHP No. M: 36-29) is unrelated to the development of the park and does not contribute to its significance.

The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

- MIHP No. M: 20-50 Shady Grove Development Park, Parcel 2
- MIHP No. M: 26-82 Montgomery County Detention Center and Rockville Police Station (District 1)
- MIHP No. M: 29-77 Willerburn Acres
- MIHP No. M: 30-54 Old Farm
- MIHP No. M: 31-74 Forest Glen Knolls
- MIHP No. M: 31-75 Forest Glen Road Houses
- MIHP No. M: 31-76 Carolyn Hill Apartments
- MIHP No. M: 32-35 Argyle Forest South Section
- MIHP No. M: 32-36 Franklin Knolls
- MIHP No. M: 33-33 Hampshire Forest
- MIHP No. M: 33-34 Holly Hall Apartments
- MIHP No. M: 33-35/PG:65-54 Hillandale Forest
- MIHP No. M: 35-204 Wolfe’s Subdivision
- MIHP No. M: 36-94 Forest Glen Park

MIHP No. M: 36-95 Northmont
MIHP No. M: 37-36/PG:65-55 Greenwich Woods
MIHP No. PG:65-50 Adelphi Forest
MIHP No. PG:65-51 Holly Hill Manor
MIHP No. PG:65-52 Holly Hill Terrace
MIHP No. PG:65-53 Knollwood
9601 Parkwood Drive
9816 Riggs Road
10001-10013 Rhode Island Avenue
D&F Construction Warehouse
Former Amoco Gas and Service Station (Forest Glen)
Former Co-op Gas and Service Station (Greenbelt)
Holly View Apartments
Industrial Bank
Lanham Strip Center
Montgomery County Division of Facilities Management
Montgomery County Public Schools Transportation and Facilities Maintenance Bethesda Depot
Seven Locks Plaza (Potomac Woods Plaza)
Silver Spring Volunteer Fire Station 16
Strip Center, 9002 Lanham Severn Road
Texaco/Exxon Gas Station (Suitland)

Finally, a portion of the Oakview community (MIHP No. M: 37-15) was previously surveyed and determined ineligible for the National Register in 2000. We agree with MDOT SHA that the survey boundary for this subdivision should be expanded to encompass additional associated residences and amenities that were omitted from the original documentation. The expanded geographic survey area was described and assessed using an MIHP Addendum Form. However, in order to formally evaluate the expanded survey area, we request the preparation of a DOE form containing the National Register evaluation to accompany the updated survey information supplied on the Addendum form.

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes

Director/State Historic Preservation Officer

EH/BC/TJT/201901808

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

May 8, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 7 of the standing structures eligibility determinations associated with Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that one of the 37 properties evaluated in this submittal is eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled for July 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 7 eligibility determinations by June 7, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@sha.state.md.us) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@sha.state.md.us) with concerns regarding archaeology.

Ms. Elizabeth Hughes
Page Two

Sincerely,

 Digitally signed by
Steve Archer
Adobe Acrobat
version:
2017.011.30140

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1 (2 pages)

Project Name: I-495 & I-270 MLS - Batch 7

May 7, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-83	Montgomery County Fleet Management	S	X	Req. 6/2019	2	DOE
M: 31-77	Forest Glen Tract (West Section)	HD	X	Req. 6/2019	2	DOE
M: 31-78	Rock Creek Hills Section 2	HD	X	Req. 6/2019	2	DOE
M: 31-79	Thomas W. Riley Estate Subdivision	HD	X	Req. 6/2019	2	DOE
M: 32-34	Indian Spring Club Estates and Indian Spring Country Club	HD	NR	Req. 6/2019	2	DOE
M: 35-205	Parkview	HD	X	Req. 6/2019	2	DOE
M: 35-206	Park View Estates	HD	X	Req. 6/2019	2	DOE
M: 35-207	Rolling Hills	HD	X	Req. 6/2019	2	DOE
M: 35-208	Spring Hill	HD	X	Req. 6/2019	2	DOE
PG:61-43	Powder Mill Estates	HD	X	Req. 6/2019	2	DOE
PG:61-85	Powder Mill Village	HD	X	Req. 6/2019	2	DOE
PG:65-56	White Oak Manor	HD	X	Req. 6/2019	2	DOE
PG:69-69	Carrollan Manor Apartments	HD	X	Req. 6/2019	2	DOE
PG:70-104	Addition to Lanham Acres	HD	X	Req. 6/2019	2	DOE
PG:70-105	Lanham Acres	HD	X	Req. 6/2019	2	DOE
M: 37-37/ PG:65-57	The Chateau	S	X	Req. 6/2019	2	DOE
-	4705 Edgewood Road	S	X	Req. 6/2019	2	Short
-	4933 Whitfield Chapel Road	S	X	Req. 6/2019	2	Short
-	6010 Princess Garden Parkway	S	X	Req. 6/2019	2	Short
-	7101 Greenbelt Road	S	X	Req. 6/2019	2	Short
-	9116-9120 Levelle Drive	S	X	Req. 6/2019	2	Short
-	9808 47th Place	S	X	Req. 6/2019	2	Short
-	9907 51st Avenue	S	X	Req. 6/2019	2	Short
-	Forestville Volunteer Fire Department	S	X	Req. 6/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
-	Former Amoco Gas and Service Station (Suitland)	S	X	Req. 6/2019	2	Short
-	Former Andrews Esso Gas and Service Station	S	X	Req. 6/2019	2	Short
-	Former Holiday Inn (Suitland)	S	X	Req. 6/2019	2	Short
-	Former Princess Garden Special Center	S	X	Req. 6/2019	2	Short
-	Former Sheraton of Washington Northeast	S	X	Req. 6/2019	2	Short
-	Indian Spring Terrace Park	S	X	Req. 6/2019	2	Short
-	K-Mart Plaza (Landover Crossing)	S	X	Req. 6/2019	2	Short
-	Marlo Furniture Warehouse and Showroom (Forestville)	S	X	Req. 6/2019	2	Short
-	Maryland State Police Barrack L Forestville	S	X	Req. 6/2019	2	Short
-	McDonald's (Suitland)	S	X	Req. 6/2019	2	Short
-	Sheehy Ford of Marlow Heights	S	X	Req. 6/2019	2	Short
-	Strip Center, 4767-4773 Allentown Road	S	X	Req. 6/2019	2	Short
-	Texaco-Shell Gas and Former Service Station (Suitland)	S	X	Req. 6/2019	2	Short

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

August 8, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 7”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 37 DOE forms represents the seventh batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following property is eligible for listing in the National Register:

MIHP No. M: 32-34 Indian Spring Club Estates and Indian Spring Country Club
This property is National Register-eligible under Criteria A, B and C as a planned suburban community by Jewish developers for the Jewish community utilizing mass-production techniques for the construction of architecturally distinctive homes targeted to the middle class.

The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

MIHP No. M: 26-83 Montgomery County Fleet Management
MIHP No. M: 31-77 Forest Glen Tract (West Section)
MIHP No. M: 31-78 Rock Creek Hills Section 2
MIHP No. M: 31-79 Thomas W. Riley Estate Subdivision
MIHP No. M: 35-205 Parkview
MIHP No. M: 35-206 Park View Estates
MIHP No. M: 35-207 Rolling Hills
MIHP No. M: 35-208 Spring Hill
MIHP No. PG:61-43 Powder Mill Estates
MIHP No. PG:61-85 Powder Mill Village
MIHP No. PG:65-56 While Oak Manor
MIHP No. PG:69-69 Carrollan Manor Apartments
MIHP No. PG:70-104 Addition to Lanham Acres

MIHP No. PG:70-105 Lanham Acres
MIHP No. M: 37-37 and PG:65-57 The Chateau
4705 Edgewood Road
4933 Whitfield Chapel Road
6010 Princess Garden Parkway
7101 Greenbelt Road
9116-9120 Levelle Drive
9808 47th Place
9907 51st Avenue
Forestville Volunteer Fire Department
Former Amoco Gas and Service Station (Suitland)
Former Andrews Esso Gas and Service Station
Former Holiday Inn (Suitland)
Former Princess Garden Special Center
Former Sheraton of Washington Northeast
Indian Spring Terrace Park
K-Mart Plaza (Landover Crossing)
Marlo Furniture Warehouse and Showroom (Forestville)
Maryland State Police Barrack L Forestville
McDonald's (Suitland)
Sheehy Ford of Marlow Heights
Strip Center, 4767-4773 Allentown Road
Texaco-Shell Gas and Former Service Station (Suitland)

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer

EH/BC/TJT/201902237

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

May 14, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville, MD 21032-2023

Ms. Julie Langan
State Historic Preservation Officer
Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Hughes and Ms. Langan:

This letter serves to inform the Maryland Historical Trust (MHT) and The Virginia Department of Historic Resources (VDHR) of an update to the Maryland Department of Transportation State Highway Administration (MDOT SHA) proposed Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The project is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland. The study limits of the I-495 & I-270 MLS encompass I-495 from south of the American Legion Bridge in Fairfax County, Virginia, to west of MD 5 and I-270 from I-495 north to I-370, including the east and west I-270 spurs along I-495.

On April 16, 2018, MDOT SHA submitted a preliminary Area of Potential Effects (APE) for the I-495 & I-270 MLS. MHT accepted MDOT SHA's APE definition on May 17, 2018 (MHT Log 201802131). At that time, MDOT SHA did not anticipate the need for substantial historic properties identification efforts within Virginia. Since that time, MDOT SHA has conducted additional constructability analysis for replacement of the American Legion Bridge, and coordinated with the Virginia Department of Transportation (VDOT) and the National Park Service (NPS) on project evaluation needs. As a result, the APE in the vicinity of the American Legion Bridge, C&O Canal National Historical Park, and within Virginia has changed. The MLS limits in Virginia overlap with the study area of VDOT's 495 Express Lanes Northern Extension (NEXT) study; MDOT SHA and VDOT are continuing to coordinate our historic properties inventory efforts and expect to use the results of each agency's architectural and archaeological surveys to support effect findings and/or development of Programmatic Agreements for the respective agency projects.

The revised I-495 & I-270 MLS APE is included as Attachment 1.

Architecture: VDOT is currently conducting survey and evaluation of historic architectural resources within the proposed MLS APE in Virginia, using the same survey cut-off date, 1978, established in MDOT SHA's Gap Analysis. Based on design evolution and in consideration of VDOT's NEXT project, MDOT SHA's APE is more precisely defined than the remainder of the corridor in Maryland, taking into account existing noise barriers and other factors that would shield adjacent properties from indirect effects. At this time MDOT SHA generally adopts VDOT's proposed architectural survey boundary along I-495 in Virginia and along the George Washington Memorial Parkway (GWMP) as sufficient for the MLS APE in Virginia. The GWMP and the Georgetown Pike are the only existing NRHP eligible or listed properties within the APE in Virginia. According to the Georgetown Pike NRHP nomination, the .53-mile section of the Georgetown Pike that provides access to I-495 within the APE does not contribute to the Georgetown Pike's significance. MDOT SHA believes that the results of VDOT's in-progress architectural history survey efforts will be sufficient to identify architectural resources potentially affected by the MDOT SHA MLS.

Archaeology:

Because design refinement has occurred since initiation of consultation, MDOT SHA's archaeological survey area is also more specifically defined in the Legion Bridge crossing vicinity and in Virginia, within and adjacent to the GWMP. As opposed to a general corridor survey boundary defined as an arbitrary distance from right-of-way, MDOT SHA is using the combined worst-case LOD of alternatives currently under consideration as the survey area for archaeology. For constructability, the LOD/archaeological survey area has been expanded within the C&O Canal property within Maryland. Additionally, potential conduit and signage needs have been identified along the GWMP. Several known archaeological resources and unsurveyed areas are known to be present along and adjacent to the GWMP in Virginia. MDOT SHA is coordinating with the National Park Service on an Archaeological Resources Protection Act (ARPA) permit and will coordinate with VDHR on the proposed survey and evaluation methods for archaeological resources in Virginia.

Review Request

Please examine the attached APE (**Attachment 1**). We request your comments by June 17, 2019 on MDOT SHA's revised I-495 & I-270 MLS APE in Maryland and Virginia in the general vicinity shown of the American Legion Bridge and along the GWMP. By email carbon copy, we are inviting the relevant agencies, local government representatives, and historic groups to provide comments and participate in the Section 106 process. Federally recognized tribes will also be invited to comment, including additional coordination with Federally Recognized Tribes in Virginia, as the previous APE definition and communication did not anticipate archaeological work by MDOT SHA within Virginia.

Ms. Elizabeth Hughes
Page Three

Pursuant to the requirements of the implementing regulations found at 36 CFR Part 800, MDOT SHA seeks the copied parties' assistance in identifying historic preservation issues as they relate to this specific project (see 36 CFR §800.2(c)(3) and (5), and §800.3(f) for information regarding the identification and participation of consulting parties, and §800.4, and §800.5 regarding the identification of historic properties and assessment of effects.

Please contact MDOT SHA Cultural Resources Team Leader Steve Archer at (410) 545-8508 or via email at sarcher@mdot.maryland.gov with any questions or information needs on this project.

Sincerely,



Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30140

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc:

Ms. Jeanette Mar, Environmental Manager, FHWA Maryland Division
Mr. Tony Opperman, VDOT
Ms. Sarah Clarke, VDOT
Ms. Lisa B. Choplin, DBIA, Director, I-495 & I-270 P3 Office, MDOT SHA
Mr. Jeffrey Folden, P.E., DBIA, Deputy Director, I-495 & I-270 P3 Office, MDOT SHA
(w/ Attachments)
Ms. Caryn Brookman, Environmental Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD



COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Matt Strickler
Secretary of Natural Resources

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

10 June 2019

Ms Julie M. Schablitsky
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Revised Area of Potential Effects for the I-495 and I-270 Managed Lanes Study
MDOT SHA Study No. AW073A11
DHR File No. 2018-0251

Dear Ms Schablitsky:

The Department of Historic Resources (DHR) has received for our review and comment the revised Area of Potential Effects (APE) as defined by the Maryland Department of Transportation State Highway Administration (MDOT SHA) for the proposed I-495 and I-270 Managed Lanes Study (MLS). The revised definition of the APE is a result of MDOT SHA's additional constructability analysis for replacement of the American Legion Bridge, and further coordination with the Virginia Department of Transportation (VDOT) and the National Park Service (NPS). As a result, the APE in the vicinity of the American Legion Bridge, C & O Canal National Historical Park, and within Virginia has changed. It is our understanding that the MLS limits in Virginia overlap with the VDOT study area for its I-495 Express Lanes Northern Expansion (NEXT) study. The MDOT SHA and VDOT plan to use the results of each other's architectural and archaeological surveys to support the respective agency's effect findings and/or development of a Programmatic Agreement.

The DHR, which in Virginia is the State Historic Preservation Office, was contacted by the NPS George Washington Memorial Parkway (GWMP) unit regarding the current MDOT SHA redefinition of the MLS APE. It expressed concern that the new APE does is not large enough to adequately address anticipated visual effects from tree clearing

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Eastern Region Office
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Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

Page 2
10 June 2019
Ms Julie M. Schablitsky

associated with the undertaking and temporary construction access. We were told that there is planned an estimated fourteen (14) acres of tree clearing on the Virginia side of the MLS, which includes both permanent and temporary vegetative loss. If this is the case, the DHR shares NPS GWMP's position that an expanded APE may be necessary to account for visual effects due to tree removal. Before DHR concurs with the new definition of the APE we request that the MDOT SHA respond to NPS GWMP and DHR regarding this issue.

If you have any questions about our comments, please contact me at (804) 482-6090.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Holma", written in a cursive style.

Marc Holma, Architectural Historian
Division of Review and Compliance

C: Ms Sarah Clarke, VDOT
Mr. Tony Opperman, VDOT
Mr. Matt Virta, NPS GWMP
Mr. Bradley Krueger, NPS GWMP

**Concurrence with the MD State Highway Administration's
Determination(s) of Eligibility and/or Effects**

Project Number: AW073A11 **MHT Log No.** 201902528
Project I-495 & I-270 Managed Lanes Study
County: Montgomery and Prince George's
Letter Date: May 15, 2019

The Maryland Historical Trust has reviewed the documentation attached to the referenced letter and concurs with the MD State Highway Administration's determinations as follows:

Appropriate Area of Potential Effects (Attachment 1)

☒ Concur
☐ Do Not Concur

Eligibility (as noted in the Eligibility Table [N/A]):

☐ Concur
☐ Do Not Concur

Effect (as noted in the Effects Table [N/A]):

☐ No Properties Affected
☐ No Adverse Effect
☐ Conditioned upon the following action(s) (see comments below)
☐ Adverse Effect

Comments:

By:

Jim O'Connell
MD State Historic Preservation Office/
Maryland Historical Trust

6/13/19
Date

Return by U.S. Mail or Facsimile to:
Dr. Julie M. Schablitsky, Assistant Division Chief, Environmental Planning Division,
MD State Highway Administration, P.O. Box 717, Baltimore, MD 21203-0717
Telephone: 410-545-8870 and Facsimile: 410-209-5046
A-Proj #9690 Ervin/Manning

Cc: Ervin
Manning

May 28 2019

Ms. Julie Langan
State Historic Preservation Officer
Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Langan:

This letter provides the Virginia Department of Historic Resources (VDHR) with the proposed scope of archaeological investigations in Virginia for the Maryland Department of Transportation State Highway Administration (MDOT SHA) proposed Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS).

As indicated in our May 14, 2019 letter, MDOT SHA's proposed project design in Virginia now extends outside the proposed limits of disturbance of the Virginia Department of Transportation's (VDOT) 495 Express Lanes Northern Extension (NEXT) project in and near the George Washington Memorial Parkway.

In coordination with VDOT and the National Park Service (NPS), MDOT SHA proposes to conduct Phase I and Phase II archaeological investigations within lands administered by the National Park Service in the George Washington Memorial Parkway (GWMP). A map of the proposed MDOT SHA archaeological survey area for the MLS in Virginia is enclosed as **Attachment 1**.

MDOT SHA's archaeology survey area also encompasses proposed project impacts for the VDOT NEXT Project. Potential ramp locations and conduit and signage needs have been identified along the GWMP, and several known archaeological resources and unsurveyed areas are present within the LOD in Virginia. MDOT SHA is coordinating with the National Park Service on an Archaeological Resources Protection Act (ARPA) permit for the proposed survey and evaluation of archaeological resources in the GWMP, which is enclosed as Attachment 2.

Please examine the attached scope of work found within the ARPA permit application (**Attachment 2**). We request your comments by June 28, 2019 on MDOT SHA's proposed scope of archaeological investigations along the GWMP in Virginia.

Please contact MDOT SHA Cultural Resources Team Leader Steve Archer at (410) 545-8508 or via email at sarcher@mdot.maryland.gov with any questions or information needs on this

Ms. Elizabeth Hughes
Page Two

project, or MDOT SHA archaeologist Richard Ervin at (410) 545-2878 or via email at rervin@mdot.maryland.gov for concerns about archaeology.

Sincerely,



Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30142

for Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Elizabeth Hughes, Maryland State Historic Preservation Officer
Ms. Jeanette Mar, Environmental Manager, FHWA Maryland Division
Mr. Tony Opperman, VDOT
Ms. Sarah Clarke, VDOT
Ms. Lisa B. Choplin, DBIA, I-495 & I-270 P3 Office, MDOT SHA
Mr. Jeffrey Folden, P.E., DBIA, I-495 & I-270 P3 Office, MDOT SHA
Ms. Caryn Brookman, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD

Attachment # 2

May 15, 2019

[illegible]

Resource Types: S (Structure), A (Archaeological Site), HD (Historic District), NHL (National Historic Landmark)
 NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)
 Impact: None, No Adverse, Adverse
 Effect: NPA (No Properties Affected), NAE (No Adverse Effect), AE (Adverse Effect)
Bold rows indicate review action requested



COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Matt Strickler
Secretary of Natural Resources

Julie V. Langan
Director

Tel: (804) 367-2323
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www.dhr.virginia.gov

28 June 2019

Ms Julie M. Schablitsky
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Proposed archaeological scope for the I-495 and I-270 Managed Lanes Study
MDOT SHA Study No. AW073A11
DHR File No. 2018-0251

Dear Ms Schablitsky:

The Department of Historic Resources (DHR) has received for our review and comment the Maryland Department of Transportation State Highway Administration's (MDOT SHA) proposed scope for archaeological investigations in Virginia associated with the proposed I-495 and I-270 Managed Lanes Study (MLS). The DHR understands that MDOT SHA proposes additional archaeological survey for portions of the planned limits of disturbance outside areas previously surveyed as part of the I-495 Express Lanes Northern Expansion project within lands administered by the National Park Service George Washington Memorial Parkway unit. The MDOT SHA proposes conducting a Phase I survey across all of the additional impact areas that do not exhibit extensive prior disturbance and Phase II evaluations on five archaeological sites (44FX0374, 44FX0379, 44FX0381, 44FX0389, and 44FX3160). Additionally, Site 44FX0373 will be subjected to close interval Phase I survey within the portion of the site which overlays the proposed limits of disturbance and a 150-foot buffer beyond the limit of disturbance. While DHR has no additional comments on the scope as proposed by MDOT SHA at this time, DHR recommends that MDOT SHA ensure all archaeological investigations be completed to meet or exceed DHR's *Guidelines for Conducting Historic Resources Survey in Virginia* (revised 2017).

If you have any questions about our comments, please contact me at (804) 482-6090.

Sincerely,

Marc Holma, Architectural Historian
Division of Review and Compliance

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Petersburg, VA 23803
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Fax: (804) 862-6196

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Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

C: Ms Sarah Clarke, VDOT
Mr. Tony Opperman, VDOT
Mr. Matt Virta, NPS GWMP
Mr. Bradley Krueger, NPS GWMP



United States Department of the Interior

NATIONAL PARK SERVICE
Greenbelt Park & Baltimore Washington Parkway
6565 Greenbelt Road
Greenbelt, Maryland 20770

IN REPLY REFER TO:
I. A.2. (NCR-NACE)

MAY 29 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Department of Housing and Community Development
100 Community Place
Crownsville, MD 21032

Dear Ms. Hughes:

As part of the I-495 and I-270 Managed Lanes Study Section 106 Process, National Capital Parks-East (NACE), a unit of the National Park Service (NPS), is seeking your preliminary concurrence that Greenbelt Park is potentially eligible for listing on the National Register of Historic Places. NACE recognizes that a Cultural Landscape Inventory will need to be prepared for the park in the near future in order to fulfill its Section 110 obligations of the National Historic Preservation Act of 1966.

Background:

Greenbelt Park was established in 1950 as part of a comprehensive and continuous development of the park system of the national capital region. The park provides high quality camping, picnicking, and hiking in wooded area and along stream corridors, preserving forests, and contributing to the protection of water quality in the Anacostia River watershed. This 1,100-acre park features a 174-site campground, nine (9) miles of trails, and three picnic areas.

The Historic Resources Study¹ done in 2006 for Greenbelt Park recognizes that the Park was initially constructed with funds from the Park Service's Mission 66 program, but did not find any of the building types or small-scale features of exceptional importance and pointed out that there was no established NPS nationwide or regional context at that time by which such construction at Greenbelt Park could be evaluated.²

In 2015, a Multiple Property Documentation (MPD) listing for NPS Mission 66 Era Resources (#65501248) was done to establish that nationwide context that was missing. The MPD notes that NPS Mission 66 resources are located nationwide in the national parks designated through 1972 and includes Greenbelt Park (est. 1950 and from the post- World War II era) as a park that potentially may have Mission 66 resources. The period of significance for Mission 66 era is from 1945-1972. Subsequently, a DRAFT NPS National Capital Region (NCR) Mission 66 MPD Form has added to the context by stating that Greenbelt Park received its initial development from the Mission 66 program, including the construction of the park maintenance building, U.S. Park Police sub-station, and additional parking, while

¹ Robinson & Associates, *Greenbelt Park, National Capital Parks –East, Historic Resources Study (Final)*. Prepared for the National Park Service, National Capital Region, May 31, 2006.

² Ibid, 117.

also pointing out that little additional development has taken place at Greenbelt Park since Mission 66 funding ended.³

Significance Statement:

Though it has not been formally nominated or listed, nor has a determination of eligibility been done, based on the MPD and draft NCR Mission 66 MPDF, the NPS considers Greenbelt Park potentially significant under National Register of Historic Places Criteria A, C, and D due to historic structures associated with the NPS Mission 66 era, cultural landscape, and potentially information-yielding prehistoric and historic archeological resources. Greenbelt Park is significant as a Property Type 3-Public Use District/Facility as the park includes a variety of contributing resources to the Mission 66 program, such as Greenbelt Park - Main Park Road (1961); Greenbelt Park Maintenance Building (ca. 1964); Greenbelt Park USPP Substation D-4 (ca. 1964); Greenbelt Park Picnic Areas (Sweetgum, Laurel, Holly Picnic Areas - ca. 1964); and Greenbelt Park Comfort Stations (ca. 1964).

Greenbelt Park is locally significant under Criterion A as the majority of the park was developed from the Mission 66 program and it fulfilled NCR's goal of providing a variety of recreational opportunities for DC's urban population after WWII. NCR was the main federal agency in the area with authority over substantial natural areas, watersheds, and urban reservations, and it planned and executed its Mission 66 program with an eye toward providing picnic and camping facilities, hiking trails, ball fields, golf courses, a boat center for local high schools and colleges, interpretation of natural and historic resources aimed at schoolchildren, and other facilities for local residents in addition to tourists visiting the nation's capital.

Greenbelt Park is also significant under Criterion C as it typifies the landscape design characteristics of the Mission 66 program, and the only park in the region where almost all of the landscape, roads, campsites, comfort stations, and buildings were constructed during this time. In particular, the campgrounds followed new Mission 66 standards, which included tightly confined developed areas within attractive natural settings, connected by one-way loop roads and hiking trails. Vegetation was also preserved to the greatest extent and the campgrounds featured modern comfort stations. Aside from following the "park service modern" style, the Greenbelt Park USPP Substation (ranger station) was sited at the park's entrance and served as the first official point of contact within the park boundaries for some visitors. Its relatively low profile also 'harmonized' with its setting through horizontality of massing, and color and texture of materials. Finally, the roads and trails were also designed and constructed following Mission 66 design principles including, the use of retaining walls to reduce the height and extent of cut-and-fill slopes, use of vegetation to blend ditches and shoulders to the adjacent landscape was a standard policy, and cut-and-fill slopes were rounded, warped at the end for a natural transition.

Thank you for your attention to this matter and we look forward to receiving your concurrence. Should any questions arise during your review, please do not hesitate to contact Mike Commisso, Acting Chief of Resource Management at (202) 690-5160 or by email at michael_commisso@nps.gov.

Sincerely,



Matthew D. Carroll
Superintendent

³ Robinson & Associates, *Mission 66-Era Visitor Centers, Administration Buildings, and Public Use Areas in the National Capital Region of the National Park Service*, NRHP Multiple Property Documentation Form (DRAFT), 2012.

On Jun 18, 2019, at 3:38 PM, Beth Cole - MHT <beth.cole@maryland.gov> wrote:

Mike,

Thank you for your recent letter providing NPS's views regarding the National Register eligibility of Greenbelt Park. Attached please find the MD SHPO's concurrence with NPS's findings that Greenbelt Park is potentially eligible for the NRHP under Criteria A and C. We have assigned inventory number PG:67-69 to Greenbelt Park and it will now be added to our GIS and inventory records. For purposes of Section 106, we will treat Greenbelt Park as an eligible historic property. We look forward to further coordination with NPS in its further study and documentation of Greenbelt Park. Let me know if you have questions or need further assistance.

Have a good afternoon,

Beth

Beth Cole

Administrator, Project Review and Compliance
Maryland Historical Trust
Maryland Department of Planning

100 Community Place

Crownsville, MD 21032

beth.cole@maryland.gov / 410-697-9541

MHT.Maryland.gov

[Please take our customer service survey](#)

Planning.Maryland.gov / Census.Maryland.gov



On Wed, May 29, 2019 at 5:04 PM Commisso, Michael <michael_commisso@nps.gov> wrote:

Good afternoon Beth,

As we discussed, as part of the I-495 and I-270 Managed Lanes Study Section 106 Process, National Capital Parks-East (NACE), a unit of the National Park Service (NPS), is seeking your preliminary concurrence that Greenbelt Park is potentially eligible for listing on the National Register of Historic Places (see attachment). NACE recognizes that a Cultural Landscape Inventory will need to be prepared for the park in the near future in order to fulfill its Section 110 obligations of the National Historic Preservation Act of 1966.

Let me know if you have any questions or concerns.

Mike

Please note, I am out of the office on detail to National Capital Parks-East. For National Mall and Memorial Parks related issues, please contact Catherine Dewey at (202) 245-4711. Thank you.

Michael Commisso

Acting Chief of Resource Management

National Capital Parks-East

1900 Anacostia Drive SE

Washington, DC 20020

202.690.5160 office

202.494.6905 cell

Cultural Resources Program Manager

National Mall and Memorial Parks

National Park Service

900 Ohio Drive, SW

Washington, DC 20024

<GreenbeltPark MDSHPO 06-18-19.pdf>

June 7, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 8 of the standing structures eligibility determinations associated with the Maryland Department of Transportation State Highway Administration (MDOT SHA) Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that one of the 48 properties evaluated in this submittal is newly eligible for the National Register of Historic Places (NRHP).

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the final batch submittal, scheduled for July 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

The Batch 8 submittal also includes the finalized *Suburbanization Historic Context Addendum (1961-1980), Montgomery and Prince George's Counties, Maryland*. A hard copy and digital copy on CD are included for MHT's library.

Ms. Elizabeth Hughes
Page Two

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 8 eligibility determinations by July 8, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@mdot.maryland.gov) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@mdot.maryland.gov) with concerns regarding archaeology.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Schablitsky", with a stylized flourish at the end.

Julie M. Schablitsky
Chief Archaeologist/ADC
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, FHWA
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1 (2 pages)

Project Name: I-495 & I-270 MLS - Batch 8

June 7, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-84	Julius West Junior High School (Julius West Middle School)	S	X	Req. 7/2019	2	DOE
M: 26-85	Washington National Pike Industrial Park, Block A	HD	X	Req. 7/2019	2	DOE
M: 29-78	Cabin John Regional Park	HD	X	Req. 7/2019	2	DOE
M: 29-79	Congressional Country Club	HD	NR	Req. 7/2019	2	DOE
M: 32-37	Argyle Local Park	HD	X	Req. 7/2019	2	DOE
M: 35-38	In the Woods	S	-	NR 10/2000	2	Rev. DOE
PG:66-38	Hollywood Addition	HD	X	Req. 7/2019	2	Rev. DOE
PG:66-41	Sunnyside and Sunnyside Knolls	HD	X	Req. 7/2019	2	Rev. DOE
PG:66-69	Hollywood	HD	X	Req. 7/2019	2	Rev. DOE
PG:66-82	Edgewood Knolls	HD	X	Req. 7/2019	2	DOE
PG:66-83	Sunnyside B	HD	X	Req. 7/2019	2	DOE
PG:67-70	Goddard Space Village	HD	X	Req. 7/2019	2	DOE
PG:67-71	Good Luck Estates	HD	X	Req. 7/2019	2	DOE
PG:67-72	Greenbriar Condominiums	HD	X	Req. 7/2019	2	DOE
PG:67-73	Hunting Ridge	HD	X	Req. 7/2019	2	DOE
PG:67-74	Schrom Hills	HD	X	Req. 7/2019	2	DOE
PG:69-70	Carrollan	HD	X	Req. 7/2019	2	DOE
PG:69-71	Princess Springs	HD	X	Req. 7/2019	2	DOE
PG:72-78	Washington Suburban Sanitary Commission (WSSC) Central Avenue Water Pumping Station	S	X	Req. 7/2019	2	DOE
PG:76A-61	Andrews Village	HD	X	Req. 7/2019	2	DOE
PG:76A-62	Forest Village Apartments	HD	X	Req. 7/2019	2	DOE
PG:76B-76	Allentowne Apartments	HD	X	Req. 7/2019	2	DOE
PG:76B-77	Andrews Manor	HD	X	Req. 7/2019	2	DOE
PG:76B-78	Andrews Manor Apartments	HD	X	Req. 7/2019	2	DOE

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
PG:76B-79	Andrews Manor Shopping Center	HD	X	Req. 7/2019	2	DOE
-	4305 Forestville Road	S	X	Req. 7/2019	2	Short
-	5401 Florist Place	S	X	Req. 7/2019	2	Short
-	Chevy Chase Recreation Association	S	X	Req. 7/2019	2	Short
-	Ephesians New Testament Church	S	X	Req. 7/2019	2	Short
-	Herc Rentals	S	X	Req. 7/2019	2	Short
-	Holy Cross Lutheran Church	S	X	Req. 7/2019	2	Short
-	Joint Base Andrews Water Tower	S	X	Req. 7/2019	2	Short
-	Kingdom Square	S	X	Req. 7/2019	2	Short
-	Morris Park	S	X	Req. 7/2019	2	Short
-	North Chevy Chase Local Park	S	X	Req. 7/2019	2	Short
-	Peterbilt	S	X	Req. 7/2019	2	Short
-	Ryder Truck Rental & Leasing	S	X	Req. 7/2019	2	Short
-	U-Haul Moving & Storage of Landover	S	X	Req. 7/2019	2	Short
-	Warehouse, 5000-5060 Beech Place	S	X	Req. 7/2019	2	Short
-	Warehouses, 8901-8961 D'Arcy Road	S	X	Req. 7/2019	2	Short
-	Whitfield Chapel Park	S	X	Req. 7/2019	2	Short
M: 20-15	Gaither-Howes House	S	X	Req. 7/2019	2	Addendum
M: 20-24	Mills House	S	X	Req. 7/2019	2	Addendum
M: 26-6	Poor Farm, Site and Cemetery	S	X	Req. 7/2019	2	Addendum
M: 36-36	Louis C. & Charlotte E. Dismer Property	S	X	Req. 7/2019	2	Addendum
PG:76A-25	L and R Lawnmower	S	X	Req. 7/2019	2	Addendum
PG:76A-26	Helen Knox House	S	X	Req. 7/2019	2	Addendum
PG:77-60	Hazard Storage (AAFB Building #1990)	S	X	Req. 7/2019	2	Addendum

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

August 8, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 8”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 41 DOE forms represents the eight batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following property is eligible for listing in the National Register:

MIHP No. M: 29-79 Congressional Country Club

This property is National Register-eligible under Criteria A and C for its association with the development of 20th century country clubs and the role of this club as a gathering place for the political and business elite of Washington, D.C. The property is also significant for the design of its distinctive clubhouse.

The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

MIHP No. M: 26-84 Julius West Junior High School (Julius West Middle School)

MIHP No. M: 26-85 Washington National Pike Industrial Park, Block A

MIHP No. M: 29-78 Cabin John Regional Park

MIHP No. M: 32-37 Argyle Local Park

MIHP No. PG:66-38 Hollywood Addition

MIHP No. PG:66-41 Sunnyside and Sunnyside Knolls

MIHP No. PG:66-69 Hollywood

MIHP No. PG:66-82 Edgewood Knolls

MIHP No. PG:66-83 Sunnyside B

MIHP No. PG:67-70 Goddard Space Village

MIHP No. PG:67-71 Good Luck Estates

MIHP No. PG:67-72 Greenbrier Condominiums

MIHP No. PG:67-73 Hunting Ridge
MIHP No. PG:67-74 Schrom Hills
MIHP No. PG:69-70 Carrollan
MIHP No. PG:69-71 Princess Springs
MIHP No. PG:72-78 WSSC Central Avenue Water Pumping Station
MIHP No. PG:76A-61 Andrews Village
MIHP No. PG:76A-62 Forest Village Apartments
MIHP No. PG:76B-76 Allentowne Apartments
MIHP No. PG:76B-77 Andrews Manor
MIHP No. PG:76B-78 Andrews Manor Apartments
MIHP No. PG:76B-79 Andrews Manor Shopping Center
4305 Forestville Road
5401 Florist Place
Chevy Chase Recreation Association
Ephesians New Testament Church
Herc Rentals
Holy Cross Lutheran Church
Joint Base Andrews Water Tower
Kingdom Square
Morris Park
North Chevy Chase Local Park
Peterbilt
Ryder Truck Rental & Leasing
U-Haul Moving & Storage of Landover
Warehouse, 5000-5060 Beech Place
Warehouses, 8901-8961 D'Arcy Road
Whitfield Chapel Park

The property known as In the Woods (MIHP No. M: 35-38) was previously evaluated and determined eligible for listing in the National Register in 2000. As part of the current study, MDOT SHA revisited the property to update its National Register boundary, period of significance and character-defining features. We concur with the revised documentation and historic boundary for this resource.

Finally, we acknowledge receipt of the final revised draft of the following report: Suburbanization Historic Context Addendum (1961-1980) (MDOT SHA 2019). This report has been accessioned into our library.

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer
EH/BC/TJT/201902893

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

July 8, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville MD 21032-2023

Dear Ms. Hughes:

This letter serves to inform the Maryland Historical Trust (MHT) of the completion of Batch 9 of the standing structures eligibility determinations associated with the Maryland Department of Transportation State Highway Administration (MDOT SHA) Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway), as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

Please see Attachment 1 for a list of the properties included in this batch submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that one of the 50 properties included in this submittal is newly eligible for the National Register of Historic Places (NRHP). Two other properties are eligible: the Glenarden Historic District (PG:72-26/PG:73-26) and the Philip F. Gormley House/Gagarin Property (M: 35-162). The Glenarden Historic District is a revised and expanded version of the Town of Glenarden Determination of Eligibility (DOE) form MDOT SHA submitted to MHT as part of Batch 2. New information based on additional survey and ongoing research in the area has resulted in an expansion of the previous boundary. MHT holds an easement on the Philip F. Gormley House/Gagarin Property, but the property had not been formally evaluated for the NRHP using MHT's DOE form.

MDOT SHA provided a review draft of the DOE form for the U.S. Postal Service (USPS) Southern Maryland Processing and Distribution Center to Mr. Daniel Delahaye, Federal Preservation Officer for the USPS. The included form for that facility reflects input from the USPS.

Also included is a Maryland Inventory of Historic Properties form for the Marriott International Corporate Headquarters in Bethesda. This form replaces the DOE form submitted to MHT as part of Batch 2.

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. MDOT SHA will provide an Access database with the

Ms. Elizabeth Hughes
Page Two

final batch submittal, anticipated in September 2019, that includes all properties evaluated for the I-495 & I-270 MLS.

Please examine the attached Eligibility Table (Attachment 1) and batch submittal (Attachment 2). We request your concurrence with MDOT SHA's Batch 9 eligibility determinations by August 7, 2019. Please contact Matt Manning at 410-545-8560 (or via email at MManning@mdot.maryland.gov) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@mdot.maryland.gov) with concerns regarding archaeology.

Sincerely,



Digitally signed by
Steve Archer
Adobe Acrobat
version:
2017.011.30143

for Julie M. Schablitsky
Chief Archaeologist/Assistant Division Chief
Environmental Planning Division

Attachments

cc:

Ms. Jeanette Mar, FHWA
Mr. Daniel Delahaye, USPS
Ms. Lisa B. Choplin, Project Manager, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #1 (2 pages)

Project Name: I-495 & I-270 MLS - Batch 9

July 8, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 26-86	Potomac Valley Nursing Home (Potomac Valley Nursing and Wellness Center)	S	X	Req. 8/2019	2	DOE
M: 29-80	Cabin John Stream Valley Park	HD	X	Req. 8/2019	2	DOE
M: 29-81	Montgomery Country Club (Bethesda Country Club)	HD	X	Req. 8/2019	2	DOE
M: 33-36	Hillandale Swim and Tennis Association	S	X	Req. 8/2019	2	DOE
M: 33-37	Xaverian College (National Labor College)	HD	X	Req. 8/2019	2	DOE
M: 35-162	Philip F. Gormley House/Gagarin Property	S	NR	Req. 8/2019	2	DOE
M: 35-209	Old Georgetown Club	S	X	Req. 8/2019	2	DOE
PG:61-86	Powder Mill Elementary School (Frances Fuchs Early Childhood Center)	S	X	Req. 8/2019	2	DOE
PG:72-26 PG:73-26	Glenarden Historic District	HD	NR	Req. 8/2019	2	Rev. DOE
PG:72-79	Centennial Village	HD	X	Req. 8/2019	2	DOE
PG:72-80	Hanson-Beltway Industrial Center	HD	X	Req. 8/2019	2	DOE
PG:73-36	Carsondale	HD	NR	Req. 8/2019	2	DOE
PG:73-37	Cranmore Knolls	HD	X	Req. 8/2019	2	DOE
PG:73-38	Rambling Hills	HD	X	Req. 8/2019	2	DOE
PG:75A-78	USPS Southern Maryland Processing and Distribution Center	HD	X	Req. 8/2019	2	DOE
PG:75A-79	Badini's Addition to Ole Longfield	HD	X	Req. 8/2019	2	DOE
PG:76A-63	Andrews Park	HD	X	Req. 8/2019	2	DOE
PG:76A-64	Silver Valley	HD	X	Req. 8/2019	2	DOE
PG:76B-80	Old Branch Avenue Houses	HD	X	Req. 8/2019	2	DOE
PG:76B-81	Princeton	HD	X	Req. 8/2019	2	DOE
PG:76B-82	Temple Terrace	HD	X	Req. 8/2019	2	DOE
PG:76B-83	Woodlane	HD	X	Req. 8/2019	2	DOE
PG:76B-84	Yorkshire Village	HD	X	Req. 8/2019	2	DOE

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
	3220 Park View Road	S	X	Req. 8/2019	2	Short
	3231 Park View Road	S	X	Req. 8/2019	2	Short
	3724 Brightseat Road	S	X	Req. 8/2019	2	Short
	3900 Penn Belt Place	S	X	Req. 8/2019	2	Short
	4704 Medley Drive	S	X	Req. 8/2019	2	Short
	5612 Lanham Station Road	S	X	Req. 8/2019	2	Short
	8803 Ardwick Ardmore Road	S	X	Req. 8/2019	2	Short
	8808 Spring Avenue	S	X	Req. 8/2019	2	Short
	8819 Saunders Lane	S	X	Req. 8/2019	2	Short
	8820 Saunders Lane	S	X	Req. 8/2019	2	Short
	8904 Ardmore Road	S	X	Req. 8/2019	2	Short
	9017 Spring Hill Lane	S	X	Req. 8/2019	2	Short
	10020 Riggs Road	S	X	Req. 8/2019	2	Short
	The Classics	S	X	Req. 8/2019	2	Short
	Ebenezer United Methodist Church	S	X	Req. 8/2019	2	Short
	Episcopal Church of the Nativity	S	X	Req. 8/2019	2	Short
	Landover Center	S	X	Req. 8/2019	2	Short
	Lanham Sports Park	S	X	Req. 8/2019	2	Short
	McDonald Field	S	X	Req. 8/2019	2	Short
	Malcolm King Park	S	X	Req. 8/2019	2	Short
	Silver Cab of P.G. & Taxi Taxi Dispatch Center	S	X	Req. 8/2019	2	Short
	Snapbox Self-Storage	S	X	Req. 8/2019	2	Short
	Waste Management - Temple Hills	S	X	Req. 8/2019	2	Short
M: 29-59	Carderock Springs Historic District	HD	-	11/2008 NRL	2	Addendum
M: 31-7	Capitol View Park Historic District	HD	-	4/2001 NR	2	Addendum
PG:76A-33	Warren Ammann House	HD	ND	Req. 8/2019	2	Addendum
M: 30-40	Marriott International Corporate Headquarters	S	ND	Req. 8/2019	2	MIHP

Codes:

Resource Types: S (Structure), A (Archeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Secretary
Sandy Schrader, Deputy Secretary

August 12, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 9”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group and RK&K LLP on behalf of the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 47 DOE forms represents the ninth batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following property is eligible for listing in the National Register:

MIHP No. 73-36 Carsondale
This historic district eligible for the National Register of Historic Places under Criterion A as one of the earliest suburban developments advertised for African American WWII veterans.

The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

MIHP No. M:26-86 Potomac Valley Nursing Home (Potomac Valley Nursing and Wellness Center)
MIHP No. M: 29-81 Montgomery Country Club (Bethesda Country Club)
MIHP No. M: 33-36 Hillandale Swim and Tennis Association
MIHP No. M: 33-37 Xaverian College (National Labor College)
MIHP No. M: 35-209 Old Georgetown Club
MIHP No. PG:61-86 Powder Mill Elementary School (Frances Fuchs Early Childhood Center)
MIHP No. PG:72-79 Centennial Village
MIHP No. PG:72-80 Hanson-Beltway Industrial Center
MIHP No. PG:73-37 Cranmore Knolls
MIHP No. PG:73-38 Rambling Hills
MIHP No. PG:75A-78 USPS Southern MD Processing & Distribution Center
MIHP No. PG:75A-79 Badini’s Addition to Ole Longfield
MIHP No. PG:76A-63 Andrews Park
MIHP No. PG:76A-64 Siler Valley
MIHP No. PG:76B-80 Old Branch Avenue Houses
MIHP No. PG:76B-81 Princeton

MIHP No. PG:76B-82 Temple Terrace
MIHP No. PG:76B-83 Woodlane
MIHP No. PG:76B-84 Yorkshire Village
3220 Park View Road
3231 Park View Road
3724 Brightseat Road
3900 Penn Belt Place
4704 Medley Drive
5612 Lanham Station Road
8803 Ardwick Ardmore Road
8808 Spring Avenue
8819 Saunders Lane
8820 Saunders Lane
8904 Ardmore Road
9017 Spring Hill Lane
10020 Riggs Road
The Classics, 4591 Allentown Road
Ebenezer United Methodist Church, 4912 Whitfield Chapel Road
Episcopal Church of the Nativity, 5203 Manchester Drive
Landover Center, 1701 Brightseat Road
Lanham Sports Park, 7700 Good Luck Road
McDonald Field, 13 Southway
Malcolm King Park, 1200 West Side Drive
Silver Cab of P.G. & Taxi Taxi Dispatch Center, 8316 Ardwick Ardmore Road
Snapbox Self-Storage, 5061 Beech Place
Waste Management – Temple Hills, 4900 Beech Place

The property known as the Town of Glenarden (MIHP Nos. PG:72-26/73-26) was previously evaluated and determined eligible for listing in the National Register in 2018. Ongoing research conducted as part of this study has resulted in an expansion of the previously identified historic boundary. We concur with the revised documentation and historic boundary for the property now known as the Glenarden Historic District.

The Trust holds a perpetual preservation easement on the Philip F Gormley House/Gagarin Property (MIHP No. PG:35-162), however, a formal DOE was never completed. We appreciate MDOT SHA's preparation of a DOE for this resource and agree that it is National Register eligible.

The Trust agrees that the Cabin John Stream Valley Park (MIHP No. M: 29-80) is not eligible for listing in the National Register based on the existing analysis presented in MDOT SHA's DOE form. The property is a late example of park creation in the region and possesses minimal manmade improvements. However, we welcome future efforts to develop a comprehensive context or multiple property documentation of the Stream Valley Park system that could result in a re-evaluation of this property.

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes

Director/State Historic Preservation Officer

EH/BC/TJT/201903398

cc:

Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

November 26, 2019

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville, MD 21032-2023

Ms. Julie Langan
State Historic Preservation Officer
Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Hughes and Ms. Langan:

This letter serves to inform the Maryland Historical Trust (MHT) and the Virginia Department of Historic Resources (VDHR) of an update to the Area of Potential Effects (APE) and the completion of Batch 10 of the standing structures eligibility determinations associated with the Maryland Department of Transportation State Highway Administration (MDOT SHA) Study No. AW073A11, I-495 & I-270 Managed Lanes Study (MLS). The MLS is the first element of a broader I-495 & I-270 Public-Private Partnership (P3) Program which considers improvements along the entire length of I-495 (Capital Beltway) in Maryland, connecting into Virginia's portion of I-495, as well as the entire length of I-270 (Dwight D. Eisenhower Memorial Highway) up to I-70 in Frederick County, Maryland.

MDOT SHA initially defined the APE in a letter to MHT dated April 16, 2018. In the absence of engineered alternatives, the APE at the time was established using a Corridor Study Boundary (CSB) as the initial survey boundary. The CSB, a 300-foot-wide area along the centerline of I-495 and I-270 within the project limits, was the area in which it was assumed physical impacts would occur. The APE extended an additional 250 feet along either side of the CSB and was entirely within Maryland. MHT accepted MDOT SHA's definition of the APE on May 17, 2018 (MHT Log 201802131).

On May 14, 2019, MDOT SHA submitted an updated APE for the I-495 & I-270 MLS encompassing parts of the Virginia Department of Transportation's 495 Express Lanes Northern Extension (NEXT) study in the vicinity of the American Legion Bridge. MHT accepted the updated APE definition on June 13, 2019 (MHT Log 201902528).

MDOT SHA received comments from the National Park Service and VDHR requesting clarification of visual effects considerations regarding the APE in the vicinity of the American Legion Bridge spanning Maryland and Virginia over the Potomac River. MDOT SHA notes that sizable historic properties are present at both landings of the bridge (George Washington Memorial Parkway in Virginia and The Chesapeake and Ohio Canal National Historical Park in Maryland). MDOT SHA will consider effects to these resources in their entirety. MDOT SHA believes the 250-foot buffer is consistent with the consideration to effects to viewshed, setting and feeling given to all other historic properties for the study and does not merit special extension in this area. As with all other historic properties, MDOT SHA considers effects to the property in total even if only a portion of the property falls within the APE. However, because the limits of disturbance (LOD) have expanded at the American Legion Bridge, the APE is accordingly shown 250 feet from the edge of LOD, resulting in a minor APE expansion within the Potomac River.

Since the APE update in May 2019, following design advancement and the establishment of engineered alternatives, MDOT SHA has developed LOD for the alternatives under consideration. Refinements to the LOD have resulted in an expanded APE in Maryland. MDOT SHA has revised the APE using the LOD for Alternative 10, which represents the broadest alternative for physical construction impacts. In general, the LOD is narrower than the CSB and is a more accurate estimation of project impacts. However, where the LOD is smaller than the CSB, the APE continues to use the larger limits of the CSB. Where the LOD extends beyond the CSB, the APE has expanded. As it did with the CSB, the APE extends 250 feet on either side of the Alternative 10 LOD. Within Virginia, particularly along the west side of I-495, the APE has a reduced buffer from the LOD in some areas for consistency with VDOT's NEXT project, taking into account the presence of noise barriers and where engineering design has been more refined. The APE within Virginia is unchanged from the May 2019 submittal.

Please see Attachment 2 for a list of the properties included in the Batch 10 submittal and a summary of MDOT SHA's eligibility findings. MDOT SHA has determined that 2 of the 46 properties evaluated in this submittal, Capitol Car Distributors (PG:70-95) and Little Washington (PG:78-39), are eligible for the National Register of Historic Places (NRHP). Oakview (M: 37-15), which MDOT SHA originally submitted as an Addendum form with Batch 6, is included on a Determination of Eligibility (DOE) form at MHT's request to facilitate concurrence with the neighborhood's expanded boundaries.


Also included is a revised Addendum form for Carderock Springs (M: 29-59), which corrects a mapping error on the version submitted to MHT as part of Batch 9.

This batch submittal includes printed forms for each resource and an archival disc with digital photographs and PDF copies of the forms. Following this submittal, MDOT SHA will provide MHT with an Access database that includes all properties evaluated for the I-495 & I-270 MLS through Batch 10.

Ms. Elizabeth Hughes
Page Three

Please examine the attached APE Map (Attachment 1), Eligibility Table (Attachment 2), and batch submittal (Attachment 3). We request comments from MHT and VDHR by December 26, 2019, on MDOT SHA's revised APE. By the same date, we request MHT concurrence with MDOT SHA's Batch 10 eligibility determinations. Please contact Matt Manning at 410-545-8560 (or via email at MManning@mdot.maryland.gov) with questions regarding standing structures for this project. Richard Ervin may be reached at 410-545-2878 (or via email at RErvin@mdot.maryland.gov) with concerns regarding archaeology.

Sincerely,

 Digitally signed
by Steve Archer
Adobe Acrobat
version:
2017.011.30152

for Julie M. Schablitsky
Chief Archaeologist/Assistant Division Chief
Environmental Planning Division

Attachments

cc: Ms. Jeanette Mar, Environmental Manager, FHWA Maryland Division
Mr. John Simkins, FHWA Virginia Division
Mr. Tony Opperman, VDOT
Ms. Sarah Clarke, VDOT
Ms. Lisa B. Choplin, DBIA, Director, I-495 & I-270 P3 Office, MDOT SHA
Mr. Jeffrey Folden, P.E., DBIA, Deputy Director, I-495 & I-270 P3 Office, MDOT SHA
Mr. Steve Archer, MDOT SHA-EPLD
Mr. Richard Ervin, MDOT SHA-EPLD
Mr. Matt Manning, MDOT SHA-EPLD
Dr. Julie Schablitsky, MDOT SHA-EPLD

Eligibility Table

Attachment #2 (2 pages)

Project Name: I-495 & I-270 MLS - Batch 10

November 26, 2019

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
M: 21-285	The Willows	HD	X	Req. 12/2019	3	DOE
M: 26-87	Fallsmead	HD	X	Req. 12/2019	3	DOE
M: 30-55	Martin Marietta Corporation Headquarters	S	X	Req. 12/2019	3	DOE
M: 31-80	Forest Grove Elementary School	S	X	Req. 12/2019	3	DOE
M: 32-38	Indian Spring Park	HD	X	Req. 12/2019	3	DOE
M: 35-210	Wyngate	HD	X	Req. 12/2019	3	DOE
M: 36-97	The Valley	HD	X	Req. 12/2019	3	DOE
M: 36-98	Woodside Forest	HD	X	Req. 12/2019	3	DOE
M: 36-99	Technical Service Park	S	X	Req. 12/2019	3	DOE
M: 37-15	Oakview (Batch 6 Addendum Revised to DOE)	HD	X	Req. 12/2019	3	DOE
PG:67-75	Lakecrest	HD	X	Req. 12/2019	3	DOE
PG:70-95	Capitol Car Distributors	S	NR	Req. 12/2019	3	DOE
PG:73-39	Spring Dale	HD	X	Req. 12/2019	3	DOE
PG:76B-85	Abbott Forest	HD	X	Req. 12/2019	3	DOE
PG:76B-86	Glenn-Hills	HD	X	Req. 12/2019	3	DOE
PG:76B-87	Manchester Estates	HD	X	Req. 12/2019	3	DOE
PG:78-39	Little Washington	HD	NR	Req. 12/2019	3	DOE
	223 University Boulevard	S	X	Req. 12/2019	3	Short
	1509 Forest Glen Road	S	X	Req. 12/2019	3	Short
	2410-26 Linden Lane	S	X	Req. 12/2019	3	Short
	5502 Old Branch Avenue	S	X	Req. 12/2019	3	Short
	6001 Auth Road	S	X	Req. 12/2019	3	Short
	6302 Princess Garden Parkway	S	X	Req. 12/2019	3	Short
	6314 Princess Garden Parkway	S	X	Req. 12/2019	3	Short
	6712 McKeldin Drive	S	X	Req. 12/2019	3	Short
	7100 Heatherhill Road	S	X	Req. 12/2019	3	Short
	7104 Heatherhill Road	S	X	Req. 12/2019	3	Short

Codes:

Resource Types: S (Structure), A (Archaeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested

MIHP	Resource Name	Type	SHA NR Det.	SHPO Opinion	Attach.	Remarks
	7124 Greentree Road	S	X	Req. 12/2019	3	Short
	7601 Good Luck Road	S	X	Req. 12/2019	3	Short
	9001 Annapolis Road	S	X	Req. 12/2019	3	Short
	9001 Ardmore Road	S	X	Req. 12/2019	3	Short
	9011 Annapolis Road	S	X	Req. 12/2019	3	Short
	9075 Comprint Court	S	X	Req. 12/2019	3	Short
	Douglass E. Patterson Park	S	X	Req. 12/2019	3	Short
	Episcopal Church of Our Saviour	S	X	Req. 12/2019	3	Short
	Forestville Asphalt	S	X	Req. 12/2019	3	Short
	Grace Presbyterian Church	S	X	Req. 12/2019	3	Short
	James E. Duckworth School	S	X	Req. 12/2019	3	Short
	Knights of Columbus Prince George's Council	S	X	Req. 12/2019	3	Short
	Morningside Shell Service Station	S	X	Req. 12/2019	3	Short
	Museum Warehouse, Building 178, Forest Glen Annex	S	X	Req. 12/2019	3	Short
	Shell Gas and Service Station (Gaithersburg)	S	X	Req. 12/2019	3	Short
	Shell Gas and Service Station (Rockville)	S	X	Req. 12/2019	3	Short
	Shell Service Station and Strip Center	S	X	Req. 12/2019	3	Short
	Sheraton Potomac Inn	S	X	Req. 12/2019	3	Short
	Steuart Ford	S	X	Req. 12/2019	3	Short
M: 29-59	Carderock Springs Historic District (8124 Stone Trail Drive)	HD	-	11/2008 NRL	3	Addendum

Codes:

Resource Types: S (Structure), A (Archaeological Site), HD (Historic District), NHL (National Historic Landmark)

NR Determination: ND (Not Determined), X (Not Eligible), NR (Eligible), NRL (Listed), NHL (Landmark)

SHPO Opinion: (B) designates opinion regarding boundary, Code following date signifies SHPO opinion

Bold rows indicate review action requested



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Matt Strickler
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

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23 December 2019

Ms Julie M. Schablitsky
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Update on APE and Batch 10 architectural properties for the I-495 and I-270
Managed Lanes Study
MDOT SHA Study No. AW073A11
DHR File No. 2018-0251

Dear Ms Schablitsky:

The Department of Historic Resources (DHR) has received your letter of 26 November 2019 regarding the above referenced project. The correspondence from the Maryland Department of Transportation State Highway Administration (MDOT SHA) is, in part, a response to DHR's letter of 10 June 2019 commenting on the revised Area of Potential Effects (APE) for the proposed I-495 and I-270 Managed Lanes Study (MLS). Specifically, we informed MDOT SHA that the National Park Service unit at George Washington Memorial Parkway (NPS GWMP) expressed to DHR that the revised APE did not take into consideration possible visual impacts caused by an estimated 14 acres of vegetative and tree clearing associated with the undertaking and temporary construction access. In our letter, we requested MDOT SHA address NPS GWMP's concerns concerning this topic.

As stated in MDOT SHA's letter of 26 November, it believes the 250-foot buffer extended along either side of the Corridor Study Boundary "is consistent with the consideration to effects to viewshed, setting, and feeling given to all other historic properties for the study and does not merit special extension" in the area of the George

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Stephens City, VA 22655
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Washington Memorial Parkway. However, because the limits of disturbance (LOD) have expanded in the area of the American Legion Bridge the 250-foot buffer has expanded some as well. Additionally, MDOT SHA stated it is the agency's policy to "consider effects to the property in total even if only a portion of the property falls within the APE." With the knowledge that MDOT SHA has expanded the indirect APE in response to the larger LOD near the American Legion Bridge, and the fact it will assess the project effects along all of the George Washington Memorial Parkway, not just those portions within the APE, DHR has greater confidence in MDOT SHA's definition of the APE. Please note, however, that as part of the effect analysis DHR anticipates MDOT SHA to prepare visual simulations depicting the undertaking as seen at various points along the George Washington Memorial Parkway, to include locations outside the established APE.

With respect to the Batch 10 standing structures eligibility determinations, the properties covered in this submission fall entirely in Maryland and, therefore, are outside of DHR's purview. We have no comment on Batch 10.

If you have any questions about our comments, please contact me at (804) 482-6090.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Holma", written in a cursive style.

Marc Holma, Architectural Historian
Division of Review and Compliance

C: Mr. John Simkins, FHWA Virginia Division
Ms Sarah Clarke, VDOT
Mr. Tony Opperman, VDOT
Mr. Matt Virta, NPS GWMP
Ms Maureen Joseph, NPS GWMP



Maryland DEPARTMENT OF PLANNING MARYLAND HISTORICAL TRUST

December 30, 2019

Dr. Julie M. Schablitsky
MDOT State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Re: I-495 & I-270 Managed Lanes Study
Historic Structures Investigations – Determination of Eligibility Forms (“Batch 10”)
Montgomery and Prince George’s Counties
MDOT SHA Study No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust), the Maryland State Historic Preservation Office, with an opportunity to review the Determination of Eligibility (DOE) Forms produced for the above-referenced undertaking. The Trust has reviewed the materials as part of our ongoing consultation for this undertaking, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We offer the following comments and recommendations regarding the historic structures investigations.

The Maryland Department of Transportation State Highway Administration (MDOT SHA) defined in the undertaking’s original Area of Potential Effects (APE) in April 2018 and updated the APE in May 2019. Based on ongoing design development, the APE has been expanded within Maryland. The Trust agrees with the MDOT SHA’s current redefined APE.

Trust staff reviewed the Determination of Eligibility (DOE) Forms prepared by Dovetail Cultural Resources Group, RK&K LLP and the Maryland Department of Transportation State Highway Administration (MDOT SHA). MDOT SHA’s submittal of 46 DOE forms represents the tenth batch of historic structure investigations for the current I-495 & I-270 Managed Lanes Study. Our comments regarding the eligibility of historic properties for listing in the National Register of Historic Places (National Register) are provided below.

The Trust concurs with MDOT SHA that the following properties are eligible for listing in the National Register:

- MIHP No. PG:70-95 Capitol Car Distributors
This property is eligible for the National Register under Criterion C as an example of a New Formalist corporate office building of the 1960s.
- MIHP No. PG:78-39 Little Washington
This historic district is eligible for the National Register under Criterion A as an example of a mid-20th century auto-dependent African American subdivision from segregation-era Maryland.
- MIHP No. M: 29-59 Carderock Springs Historic District
The Trust agrees that the dwelling located at 8214 Stone View Trail Drive contributes to the historic significance of the National Register-listed Carderock Springs Historic District.

The Trust concurs with MDOT SHA that the following properties are not eligible for listing in the National Register:

- MIHP No. M: 21-285 The Willows
- MIHP No. M: 26-87 Fallsmead
- MIHP No. M: 30-55 Martin Marietta Corporation Headquarters

MIHP No. M: 31-80 Forest Grove Elementary School
MIHP No. M: 32-38 Indian Spring Park
MIHP No. M: 35-210 Wyngate
MIHP No. M: 36-97 The Valley
MIHP No. M: 36-98 Woodside Forest
MIHP No. M: 36-99 Technical Service Park
MIHP No. PG:67-75 Lakecrest
MIHP No. PG:73-39 Spring Dale
MIHP No. PG:76B-85 Abbott Forest
MIHP No. PG:76B-86 Glenn-Hills
MIHP No. PG:76B-87 Manchester Estates
223 University Boulevard East
1509 Forest Glen Road
2410-2426 Linden Lane
5502 Old Branch Avenue
6001 Auth Road
6302 Princess Garden Parkway
6314 Princess Garden Parkway
6712 McKeldin Drive
7100 Heatherhill Road
7104 Heatherhill Road
7124 Greentree Road
7601 Good Luck Road
9001 Annapolis Road
9001 Ardmore Road
9011 Ardmore Road
9075 Comprint Court
Douglass E. Patterson Park, 7001 Marianne Drive
Episcopal Church of Our Saviour, 1700 Powder Mill Road
Forestville Asphalt, 8700 D'Arcy Road
Grace Presbyterian Church, 5924 Princess Garden Parkway
James E. Duckworth School, 11201 Evans Trail
Knights of Columbus Prince George's Council, 9450 Cherry Hill Road
Morningside Shell Service Station, 6815 Suitland Road
Museum Warehouse, Building 178, Forest Glen Annex, Linden Lane at Smith Drive
Shell Gas and Service Station, 15730 Shady Grove Road
Shell Gas and Service Station, 1250 W. Montgomery Avenue
Shell Service Station and Strip Center, 10201-10203 New Hampshire Avenue
Sheraton Potomac Inn, 3 Research Court
Steuart Ford, 9020 Lanham Severn Road

The property known as Oakview (MIHP No. M: 37-15) was evaluated and determined not eligible for listing in the National Register in 2000. Ongoing research conducted as part of this study has resulted in an expansion of the previously documented resource to include additional associated residential buildings and amenities. The Trust accepts the revised documentation and boundary for the Oakview community, and we agree that it remains ineligible for listing in the National Register.

We look forward to ongoing consultation with MDOT SHA and other involved parties to successfully complete the Section 106 review of the Managed Lanes Study as project planning progresses. If you have questions or need further assistance, please contact Tim Tamburrino (for historic structures) at tim.tamburrino@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer
EH/BC/TJT/201905523

cc: Caryn Brookman (SHA)
Jeanette Masr (FHWA)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)



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14 February 2020

Ms Julie M. Schablitsky
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Archaeological survey for the I-495 and I-270 Managed Lanes Study
MDOT SHA Study No. AW073A11
DHR File No. 2018-0251

Dear Ms Schablitsky:

The Department of Historic Resources (DHR) has received for our review and comment the report "Cultural Resources Technical Report, Volume 6: Phase I Archaeological Survey, Intensive Phase I Archaeological Survey of Site 44FX0373, and Phase II Archaeological Evaluation of Sites 44FX0374, 44FX0379, 44FX0381, 44FX0389, 44FX3160, and 44FX3900 within the George Washington Memorial Parkway for the I-495/I-270 Managed Lanes Study (Maryland Department of Transportation), Fairfax County, Virginia" (December 2019) prepared by TRC Environmental Corporation. We provide our comments to the Federal Highway Administration (FHWA) and Maryland Department of Transportation as assistance in meeting its responsibilities under Section 106 of the National Historic Preservation Act.

The investigations and report generally meet applicable standards and guidelines and DHR accepts the report as a reasonable and good faith effort to identify historic properties. The report documents Phase I survey efforts of previously unsurveyed portions of the project's limits of disturbance. The Phase I survey within the vicinity of sites 44FX0322 and 44FX0326 encountered no cultural materials. The Phase I survey expanded the boundary of site 44FX0377 but encountered a low density of non-diagnostic lithic artifacts within the limits of disturbance. The consultant investigated a portion of site 44FX0373 within the limits of disturbance for the project at Phase I "intensive" level. The consultant evaluated six (6) sites at a Phase II level within the project limits of disturbance. The report's findings recommend sites 44FX0322, 44FX0326, and 44FX0377 remain unevaluated for their National Register of Historic Places

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(NRHP) eligibility but no further work is necessary the vicinity of sites 44FX0322, 44FX0326, and 44FX0377. The consultant recommends sites 44FX0374 and 44FX0379 eligible for listing on the NRHP. The consultant further recommends sites 44FX0381, 44FX0389, 44FX3160 and 44FX3900 are not individually eligible for listing on the NRHP. The consultant believes additional Phase II testing would be necessary to assess NRHP eligibility of site 44FX0373, but that the portion of the site within the planned limits of disturbance does not contribute to the site's overall eligibility. Finally, the report concludes that a majority of the sites (44FX0373, 44FX0374, 44FX0379, 44FX0381, and 44FX0389), as well as three (3) sites not included in this investigation (44FX0380, 44FX0390, and 44FX0227) should be listed as the "Dead Run Ridges Archaeological District" with all the aforementioned sites would contribute to the overall eligibility of the district.

The DHR project review archaeologist presented report and its recommendations to the archaeological subcommittee of our department's National Register Evaluation Committee on 7 February 2020. Based on the information provided, the committee concurs that sites 44FX0374 and 44FX0379 are eligible for listing on the NRHP under Criterion D. The committee does not agree, however, that sites 44FX0381 and 44FX0389 are not eligible and recommends both sites as individually eligible for listing on the NRHP under Criterion D. Both sites exhibit similar horizontal and vertical integrity as well as a similar level of research potential as do sites 44FX0374 and 44FX0379. The committee noted Site 44FX0381 as having a greater diversity of stone tools and distinctly Late Woodland period diagnostic artifacts, making it a notable outlier from the surrounding Late Archaic to Early Woodland period sites with potential to improve our understanding of the Late Woodland occupation of the area. The committee concurs sites 44FX3160 and 44FX3900 are not eligible for listing on the NRHP. The committee also agrees the portion of site 44FX0373 within the study area does not contribute to the site's overall potential eligibility for listing on the NRHP. Additionally, DHR concurs sites 44FX0322, 44FX0326, and 44FX0377 should remain unevaluated for NRHP eligibility and no further archaeological investigation is necessary in the project's limits of disturbance for these sites.

Finally, regarding the proposed "Dead Run Ridges Archaeological District," the committee does not endorse the recommendation to list sites 44FX0373, 44FX0374, 44FX0379, 44FX0381, 44FX0389, 44FX0380, 44FX0390, and 44FX0227 as an archaeological district. Based on the information provided, it is DHR's opinion that listing the area as an archaeological district is not appropriate at this time. The boundary for the proposed district appears arbitrarily defined by the limits of the current investigation rather than unique cultural or topographic features related to the Early Archaic through Late Woodland period use of the landscape. While DHR agrees the identified sites are analogous with one another and represent lithic and resource extraction activities along the ridges above the Potomac River, other sites characterized by similar temporal and functional affiliations extend well beyond the boundaries of the proposed district along a large portion of the Potomac. The consultant even notes that the scope of the investigation has limited the definition of the district boundaries and that "While it is beyond the scope of this investigation to consider inclusion within the District of other, nearby archaeological resources...further research may refine the proposed District boundaries or define additional archaeological districts" (Page 171). Additional research and investigations throughout the

surrounding areas may lead to a potential archaeological district focused on Archaic and Woodland period quartz extraction along the Potomac River in this topographic region, but further analysis is necessary to understand the extent of these activities throughout the region.

However, DHR acknowledges the value of considering a landscape based approach to understanding these related sites with the study area. Mitigation and potential data recovery approaches that consider the relationships between and significance of these sites from a landscape perspective may be of value for this project.

If you have any questions about our comments, please contact me at (804) 482-6090.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marc Holma', written over the word 'Sincerely,'.

Marc Holma, Architectural Historian
Division of Review and Compliance

C: Ms Sarah Clarke, VDOT
Mr. William Moore, VDOT
Mr. Tony Opperman, VDOT
Ms Maureen Joseph, NPS GWMP
Mr. Matt Virta, NPS GWMP
Mr. Bradley Krueger, NPS GWMP
Mr. John Simkins, FHWA
Mr. Steven Archer, MDOT



Maryland DEPARTMENT OF PLANNING MARYLAND HISTORICAL TRUST

March 12, 2020

Dr. Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division
MDOT State Highway Administration
P.O. Box 717
Baltimore, MD 21203-0717

Re: I-495 & I-270 Managed Lanes Study (MLS)
Montgomery and Prince George's Counties, Maryland
MDOT SHA Project No. AW073A11

Dear Dr. Schablitsky:

Thank you for providing the Maryland Historical Trust (Trust) with the six-volume *Cultural Resources Technical Report* for the above-referenced project. The Maryland Department of Transportation State Highway Administration's (MDOT SHA) submittal represents ongoing consultation to assess the project's effects on historic properties, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the Maryland Historical Trust Act of 1985, as amended, State Finance and Procurement Article §§ 5A-325 and 5A-326 of the Annotated Code of Maryland. Trust staff have conducted a thorough review of the materials and we are writing to provide our comments and concurrence below and in an attachment to this letter.

Architectural Historic Properties Comments for Maryland Sections of the Area of Potential Effects (APE): MDOT SHA's extensive efforts to identify historic properties produced the well-written and effective *Suburbanization Historic Context Addendum (1961-1980), Montgomery and Prince George's Counties* (May 2019) and resulted in the survey and evaluation of 329 resources within the built environment. A total of 51 historic properties listed in or determined eligible for the National Register of Historic Properties were identified within the undertaking's APE, as noted in Table 2.2 of *Cultural Resources Technical Report Volume 3: Architectural Historic Properties Identification* (RK&K 2019). Our comments on the undertaking's effect on these historic properties are presented below.

Archeology Comments for Maryland Sections of the APE: Trust staff reviewed the following two draft reports included in the submittal:

1. *Cultural Resources Technical Report Volume 4: Phase I Archaeological Investigation for the I-495 & I-270 Managed Lanes Study, Montgomery and Prince George's County, Maryland and Fairfax County, Virginia* (Arnold et al. 2019) and
2. *Cultural Resources Technical Report Volume 5: Supplemental Phase I Archaeological Survey and Phase II Archaeological Evaluation of Sites 18PR750, 18MO749, and 18MO751 for the I-495/I-270 Managed Lanes Study Project, Prince George's County and Montgomery Counties, Maryland* (Millis et al. 2019).

The reports present detailed documentation on the goals, methods, results and recommendations of Phase I initial and supplemental archeological survey conducted within accessible portions of the corridor study boundary and Phase II evaluations of three sites. The drafts generally meet the reporting requirements of the Trust's *Standards and Guidelines for Archeological Investigations in Maryland*. Attachment 1 lists the Trust's specific comments on the two reports. We ask SHA to have the consultants address these issues, in addition to applicable comments provided by the other consulting parties, in the preparation of the final documents. We await two hard copies and one electronic copy on disk of each final report for our Library, when available.

Based on the information presented in the report, the Trust agrees with MDOT SHA's findings as follows:

- We concur with MDOT SHA's evaluations that the following sites do not meet the criteria for eligibility in the National Register of Historic Places: 18MO22, 18MO750, 18MO753, 18MO754, 18MO755, 18MO756, 18PR425, 18PR750, 18PR1131 and 18PR1133.
- We concur with MDOT SHA's determination that sites 18MO749 and 18MO751 are eligible for inclusion in the National Register of Historic Places.
- We agree that further Phase I and II archeological investigations are warranted in specified areas to which access was denied, for indicated previously inventoried sites once more detailed project plans are developed, and in areas recommended for deep testing as stated in the draft reports.
- Based on the underwater archeological assessment of the American Legion Bridge crossing presented in the draft Phase I report, we agree that significant submerged cultural resources are unlikely to be located within the corridor study boundary and underwater archeological investigations are not warranted at this time.
- We agree that further consultation and coordination are needed to address the appropriate identification and treatment of cemeteries that may be impacted by the undertaking.

Assessment of Effects on Historic Properties: Trust staff carefully reviewed the information presented in MDOT SHA's *Cultural Resources Technical Report Volume 1: Overview and Effects Assessment* (December 2019) and other materials accompanying the submittal. Based on the supporting documentation, the Trust concurs with MDOT SHA's determination that the proposed undertaking will have an adverse effect on historic properties, including archeological properties, in Maryland. Furthermore, the Trust agrees with the following specific findings stated in MDOT SHA's submittal letter dated January 10, 2020 and accompanying attachments:

- We agree that the undertaking will adversely affect the historic properties listed in Table 1 (Attachment #2) and will also adversely affect archeological historic properties 18MO749 and 18MO751.
- We agree that the undertaking may adversely affect the historic properties listed in Table 2 (Attachment #2) and further consultation will be needed during design development to consider and address effects.
- We concur that the undertaking will have no adverse effect on the historic properties listed in Table 3 (Attachment #2).
- We acknowledge that MDOT SHA intends to request that the Federal Highway Administration make a de minimis finding for the minor Section 4(f) use of nine properties listed in Table 4 (Attachment #2). We are also including a signed concurrence sheet to facilitate the de minimis approval process.
- MDOT SHA was not able to fully complete its efforts to identify and evaluate archeological sites that may be impacted by the project given access denial issues and lack of construction

engineering details regarding the full limits of disturbance. Thus, we agree that further Phase I and II investigations may be warranted as planning develops for the following: five survey areas (Areas S-8, S-37, S-44, S-53, S-54), areas recommended for deep testing, the six sites listed in Attachment #3 to the submittal letter (18MO190, 18MO191, 18MO457, 18MO510, 18MO514, and 18MO752), plus the Moses Hall property.

- We agree that further consultation and coordination are needed to address the appropriate identification and treatment of cemeteries that may be impacted by the undertaking.

We understand that MDOT SHA intends to negotiate a Programmatic Agreement (PA), pursuant to 36 CFR 800.14(b) for this undertaking. The PA will not only stipulate mitigation measures to resolve the undertaking's adverse effect on individual historic properties, but also establish a process for ongoing identification of historic properties that may be affected, consideration and resolution of effects on additional resources, and further coordination among the various parties involved in the Section 106 consultation for this complex undertaking. We look forward to a meeting of consulting parties to fully discuss the anticipated effects and begin negotiation of appropriate mitigation measures.

Sincerely,



Elizabeth Hughes
Director/State Historic Preservation Officer
EH/BC/TJT/202000116

cc: Caryn Brookman (SHA)
Jeanette Mar (FHWA)
Julie Langan (VDHR)
Rebecca Ballo (Montgomery County Planning)
Joey Lampl (Montgomery County Parks)
Sarah Rogers (Heritage Tourism Alliance of Montgomery County, Inc.)
Howard Berger (Prince George's County Planning Department)
Aaron Marcavitch (Anacostia Trails Heritage Area, Inc.)

Tribes



May 10, 2018

Good afternoon,

The Maryland Department of Transportation State Highway Administration (MDOT SHA) proposes improvements to I-495 (the Capital Beltway) and I-270 (Washington National Pike) in Montgomery and Prince George's Counties, Maryland, and Fairfax County, Virginia. The I-495 and I-270 Managed Lane Study (MLS) would add two lanes in each direction to both highways, and the study is being done as a Public-Private Partnership (P3).

On behalf of the Federal Highway Administration, we invite you to participate in consultation with MDOT SHA under Section 106 of the National Historic Preservation Act. A preliminary evaluation of the project corridor concluded that the project may impact significant historic properties, including archaeological sites and historic standing structures. Phase I archaeology is planned for the summer of 2018. The evaluation indicates that Phase II evaluation may be required for at least one prehistoric site along Paint Branch, a tributary of the Anacostia and Potomac Rivers, and for the Montgomery County Poor Farm and Cemetery near Rockville, MD, if they are impacted by the project.

Attached is our Section 106 Initiation Letter to the MD State Historic Preservation Officer (MD SHPO), along with the MDOT SHA Tribal Notification Form. We welcome any comments you may have, look forward to further consultation if you are interested.

Please feel free to contact me if you have questions about the project or the current status of planned field investigations.

Best Regards,
Rick

Richard Ervin
MDOT State Highway Administration
Senior Archaeologist
Cultural Resources Section
Environmental Planning Division
707 North Calvert Street, Mail Stop C-LL4
Baltimore, MD 21202
Telephone: (410) 545-2878
Rervin@sha.state.md.us



MD SHA Tribal Consultation: Project Notification Form

Project Name: I-495 and I-270 Multi Lane Study Date: May 2, 2018

FMIS No: AW073A11 A-Proj No: 11729 Master No: _____

County: Montgomery & Prince George's USGS Quadrangle: _____

Project Archeologist: Richard Ervin

Telephone: 410-545-2878 Email: RErvin@sha.state.md.us FAX: 410-209-5046

Brief Project Description (attach a map and detailed project description to this form):

Add two lanes in each direction to I-495 (the Capital Beltway) and I-270

Project Type:

☐ Minor Transportation
☐ Other Categorical Exclusion

☐ Environmental Assessment
☒ Environmental Impact Statement
☐ Other _____

Archeological Potential (pre-Contact or Contact Period Sites)

☒ Known pre-Contact sites in project area
☐ Known Contact sites in project area
☒ Likely to find pre-Contact sites in project area
☐ Likely to find Contact sites in project area

☐ Unlikely to find pre-Contact sites in project area
☐ Unlikely to find Contact sites in project area
☐ No expected ground disturbance
☐ Other _____

Comments:

Tribal Response (tribal use only)

Tribal Contact for this project: Ms. Erin Thompson
Title: Tribal Historic Preservation Officer
Address: 2025 S. Gordon Cooper Drive
City, State, Zip: Shawnee, Oklahoma 74801
Telephone: 405-275-4030 Ext. 6340 Fax: _____
Email: ethompson@astribe.com
Copies to: _____

Please provide any corrections to:
Carol A. Ebright, Senior Archeologist
Maryland State Highway Administration
707 N. Calvert St.
Baltimore, MD 21202
cebright@sha.state.md.us

Consulting Party Status

Do you wish to be a consulting party on this project? ☐ Yes ☐ No ☒ Unsure
If not a consulting party, do you wish to continue to receive information about this project? ☒ Yes ☐ No ☐ Unsure
(Note: If your answer is Unsure, SHA will continue to provide information.)

Areas of Concern (This information will be kept confidential)

Do you wish to inform SHA of any traditional religious and culturally important places in or near the project area? ☐ Yes ☒ No
If "Yes" please inform SHA how to proceed to address the tribe's concerns:

Name of person completing this form (please print): Erin Thompson

Signature: Erin Thompson

Digitally signed by Erin Thompson
DN: cn=Erin Thompson, email=ethompson@astribe.com
Date: 2018.06.14 14:12:41 -05'00'

Date: Jun 14, 2018

From: Kimberly Penrod <kpenrod@delawarenation.com>

Sent: Thursday, May 31, 2018 11:12 AM

To: Richard Ervin <RErvin@sha.state.md.us>

Subject: RE: MDOT SHA I-495 and I-270 Managed Lane Study (MLS) Public-Private Partnership (P3)

Richard,

The protection of our tribal cultural resources and tribal trust resources will take all of us working together.

We look forward to working with you and your agency.

With the information you have submitted we can concur at present with this proposed plan.

Our main concerns at the Delaware Nation on these types of projects are as follows:

1. Keeping a 50-100 ft (at least) area of protection around known sites.
2. Maintaining the buffer area and not allowing heavy equipment to impact these areas. Compression is an issue of concern for us. Be mindful of material staging/storage areas.
3. Protection of indigenous plants and/or re-introduction of the indigenous plants to the area is important to the Delaware Nation. Many of these are considered Traditional Cultural Properties for our people.
4. And if something is found, halting all work, contacting us within 48 hours and when work resumes discussion of a monitor if needed.

As with any new project, we never know what may come to light until work begins.

The Delaware Nation asks that you keep us up to date on the progress of this project and if any discoveries arise please contact us immediately.

Our department is trying to go as paper free as possible. If it is at all feasible for your office to send email correspondence we would greatly appreciate.

If you need anything additional from me please do not hesitate to contact me.

Respectfully,

Kim Penrod

Delaware Nation

Director, Cultural Resources/106

Archives, Library and Museum

31064 State Highway 281

PO Box 825

Anadarko, OK 73005

(405)-247-2448 Ext. 1403 Office

(405)-924-9485 Cell

kpenrod@delawarenation.com

Unless someone like you cares a whole awful lot, nothing is going to get better. It's not. ~Dr. Seuss



MD SHA Tribal Consultation: Project Notification Form

Project Name: I-495 and I-270 Multi Lane Study Date: May 2, 2018

FMIS No: AW073A11 A-Proj No: 11729 Master No: _____

County: Montgomery & Prince George's USGS Quadrangle: _____

Project Archeologist: Richard Ervin

Telephone: 410-545-2878 Email: RErvin@sha.state.md.us FAX: 410-209-5046

Brief Project Description (attach a map and detailed project description to this form):

Add two lanes in each direction to I-495 (the Capital Beltway) and I-270

Project Type:

☐ Minor Transportation
☐ Other Categorical Exclusion

☐ Environmental Assessment
☒ Environmental Impact Statement
☐ Other _____

Archeological Potential (pre-Contact or Contact Period Sites)

☒ Known pre-Contact sites in project area
☐ Known Contact sites in project area
☒ Likely to find pre-Contact sites in project area
☐ Likely to find Contact sites in project area

☐ Unlikely to find pre-Contact sites in project area
☐ Unlikely to find Contact sites in project area
☐ No expected ground disturbance
☐ Other _____

Comments:

Tribal Response (tribal use only)

Tribes: Delaware Nation

Tribal Contact for this project: Kimberly Penrod

Title: Director, Cultural Preservation Department

Address: P.O Box 825, 31064 State Highway 281

City, State, Zip: Anadarko, OK 73005

Telephone: 405-247-2448, ext. 1403 Fax: 405 247-8905

Email: kpenrod@delawarenation.com

Copies to: _____

Please provide any corrections to:
Carol A. Ebright, Senior Archeologist
Maryland State Highway Administration
707 N. Calvert St.
Baltimore, MD 21202
cebright@sha.state.md.us

Consulting Party Status

Do you wish to be a consulting party on this project:

☒ Yes ☐ No ☐ Unsure

If not a consulting party, do you wish to continue to receive information about this project? ☐ Yes ☐ No ☐ Unsure

(Note: If your answer is Unsure, SHA will continue to provide information.)

Areas of Concern (This information will be kept confidential)

Do you wish to inform SHA of any traditional religious and culturally important places in or near the project area? ☐ Yes ☐ No

If "Yes" please inform SHA how to proceed to address the tribe's concerns:

Name of person completing this form (please print): Kim Penrod

Signature: Kim Penrod

Date: May 31, 2018

From: Jesse Bergevin <jbergevin@oneida-nation.org>
Sent: Thursday, May 31, 2018 12:36 PM
To: Richard Ervin <RErvin@sha.state.md.us>
Subject: RE: MDOT SHA I-495 and I-270 Managed Lane Study (MLS) Public-Private Partnership (P3)

Dear Mr. Ervin,

On May 10, 2018, Oneida Indian Nation (the “ Nation”) received an email and documentation from the Maryland Department of Transportation, State Highway Administration (MDOT), regarding the proposed I-495 and I-270 Improvements project (the “Project”) in Montgomery and Prince George’s Counties, Maryland. The Nation asks to be apprised of the results of the archaeological studies for the Project.

Please let me know if there are any questions.

Thank you,

Jesse Bergevin | Historic Resources Specialist
Oneida Indian Nation | 2037 Dream Catcher Plaza, Oneida, NY 13421-0662
jbergevin@oneida-nation.org | www.oneidaindiannation.com
315.829.8463 Office | 315.829.8473 Fax



MD SHA Tribal Consultation: Project Information Form

Project Name: I-495 and I-270 Multi Lane Study Date: May 14, 2019

FMIS No: AW073A11 A-Proj No: 11729 Master No: _____

County: Montgomery & Prince George's USGS Quadrangle: _____

Project Archeologist: Richard Ervin

Telephone: 410-545-2878 Email: rervin@sha.state.md.us FAX: 410-209-5046

Brief Project Description: Add up to 2 lanes to I-495 (Capital Beltway) & I-270, replace American Legion Bridge over Potomac

Project Status:

☐ Initial Notification

☒ Definition of APE

☐ Completion of Identification Studies (Phase 1)

☐ Determination of Eligibility (Phase 2)

☐ Determination of Effects

☐ Resolution of Adverse Effects

☐ Execution of MOA

☐ Conducting Mitigation (Phase 3)

☐ Other _____

Enclosures: May 14, 2019 letter to MD SHPO, with revised APE at the Potomac River Crossing, including Virginia

Comments: MDOT has identified additional potential impacts at the Potomac River, including Virginia

Tribal Response (tribal use only)

Tribes: The Delaware Nation

Tribal Contact for this project: Erin Thompson

Title: Historic Preservation Director

Address: PO Box 825, 31064 State Highway 281

City, State, Zip: Anadarko, OK 73005

Telephone: 405-247-2448 ext 1403 Fax: 405-247-8905

Email: ethompson@delawarenation-nsn.gov

Copies to: _____

Please provide any corrections to:
Carol A. Ebright, Senior Archeologist
Maryland State Highway Administration
707 N. Calvert St.
Baltimore, MD 21202
cebright@sha.state.md.us

Consulting Party Status

Do you wish to be a consulting party on this project: ☒ Yes ☐ No ☐ Unsure

If not a consulting party, do you wish to continue to receive information about this project? ☐ Yes ☐ No ☐ Unsure

(Note: If your answer is Unsure, SHA will continue to provide information.)

Comments on Enclosures if applicable (please add additional pages if necessary):

Do you agree with the findings of eligibility or effect? ☒ Yes ☐ No

If "No" please comment: _____

Do you have comments on the report or MOA: ☐ Yes ☒ No

If "Yes" please comment: _____

Areas of Concern (This information will be kept confidential)

Do you wish to inform SHA of any traditional religious and culturally important places in or near the project area? ☐ Yes ☒ No

If "Yes" please inform SHA how to proceed to address the tribe's concerns (please add additional pages if necessary):

Do you have any other concerns? ☐ Yes ☒ No

If "Yes" please inform SHA how to proceed to address the tribe's concerns:

Name of person completing this form (please print): Erin Thompson

Signature: Erin Thompson

Digitally signed by Erin Thompson
Date: 2019.07.02 12:35:54 -05'00'

Date: Jul 2, 2019



U.S. Department
of Transportation
**Federal Highway
Administration**

Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Stephen R. Adkins
7240 Adkins Road
King William, VA 23030

Dear Chief Adkins:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Chickahominy Indian Tribe wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



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**Federal Highway
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Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Gerald A. Stewart
1191 Indian Hill Lane
Providence Forge, VA 23140

Dear Chief Stewart:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Chickahominy Tribe Eastern Division wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



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**Federal Highway
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Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Dean Branham
P.O. Box 1136
Madison Heights, VA 24572

Dear Chief Branham:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Monacan Indian Nation wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



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Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Samuel Bass
1001 Pembroke Lane
Suffolk, VA 23434

Dear Chief Bass:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Nansemond Indian Tribe wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



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Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Robert Gray
1054 Pocahontas Trail
King William, VA 23806

Dear Chief Gray:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Pamunkey Indian Tribe wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

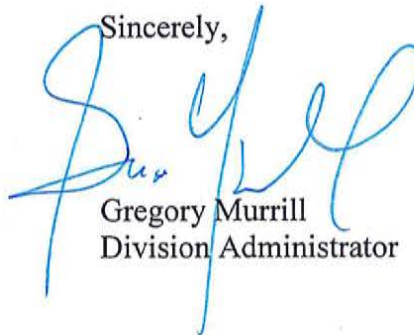
Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



U.S. Department
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**Federal Highway
Administration**

Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief Anne Richardson
5036 Indian Neck Road
Indian Neck, VA 23148

Dear Chief Richardson:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Rappahannock Tribe wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

Because the MLS project now has additional elements proposed in the Commonwealth of Virginia, the Federal Highway Administration Maryland Division respectfully requests your consultation on the project in accordance with 36 CFR 800.2(c)(2), regarding MDOT SHA's identification and evaluation of properties to which the tribe may attach religious or cultural significance.

FHWA respectfully requests your response by no later than **July 16, 2019** regarding consultation on MDOT SHA's I-495 and I-270 Managed Lanes Study, and any information needs or comments you may have at this time. Additionally, as noted in our letter of May 2018, FHWA's Maryland Division would like to confirm the tribe's interest and preferences regarding consultation on Federal-Aid projects in Maryland generally. If you would like additional information or to discuss these issues, please do not hesitate to contact Ms. Jeanette Mar, Environmental Program Manager, FHWA Maryland Division, by email to jeanette.mar@dot.gov or via phone at (410) 779-7152.

Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources



U.S. Department
of Transportation
**Federal Highway
Administration**

Maryland Division

31 Hopkins Plaza, Suite 1520
Baltimore, Maryland 21201
(410) 962-4440
(410) 962-4054

June 17, 2019

In Reply Refer To:
HDA-MD

Chief William F. Adams
5932 East River Road
King William, VA 23086

Dear Chief Adams:

In May of 2018, the Maryland Division of the Federal Highway Administration contacted you via letter to inquire if the Upper Mattaponi Indian Tribe wished to consult on Federal-Aid Highway Projects in Maryland under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. We wish to re-extend that invitation, as we did not receive a response on our earlier letter.

The letter sent in May 2018 also noted that FHWA was initiating consultation on the I-495 and I-270 Managed lanes Study (MLS), a Federal-Aid project of the Maryland Department of Transportation State Highway Administration (MDOT SHA). At that time, it was anticipated that all effects to historic properties and Section 106 consultation in Virginia for the MLS would be resolved by FHWA's Virginia Division and the Virginia Department of Transportation (VDOT), as VDOT's I-495 Northern Lanes Extension (NEXT) project footprint would account for effects to all historic properties requiring inventory and evaluation in Virginia.

Since that time, both MDOT SHA and VDOT have refined project design concepts and MDOT SHA will have proposed project elements in Fairfax County, Virginia, near the American Legion Bridge and George Washington Memorial Parkway.

In coordination with the Virginia Department of Historic Resources (VDHR), MDOT SHA has identified five additional pre-contact archaeological sites (44FX374, 44FX389, 44FX3160, 44FX381, and 44FX379) that are within the project's Area of Potential Effect. MDOT SHA is coordinating Phase II archaeological evaluation at these sites with the National Park Service, as they are located within park service property. This work is intended to determine if the sites are eligible for the National Register of Historic Places. Intensive Phase I archaeology will also be done on a sixth site, 44FX373. Additionally, MDOT SHA proposes to conduct Phase I survey within the project limits along the George Washington Memorial Parkway in Virginia, to identify any additional resources in this unsurveyed area. Three known pre-contact archaeological sites are recorded adjacent to the Phase I survey area. A map of the survey area and archaeological evaluation locations that MDOT SHA proposes in Virginia for the MLS is enclosed as part of the Area of Potential Effects update sent to the Maryland and Virginia State Historic Preservation Officers (Attachment 1).

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Sincerely,



Gregory Murrill
Division Administrator

Attachment

cc: Mr. John Simkins, FHWA Virginia Division, Planning and Environment Team Leader
Mr. Steve Archer, MDOT SHA, Cultural Resources Team Leader
Mr. Marc Holma, VA DHR, Architectural Historian
Mr. Tony Opperman, VDOT, Cultural Resources Program Manager
Ms. Sarah Clarke, VDOT, Environmental Program Planner, Cultural Resources

Additional Consulting Parties

CITY OF GREENBELT, MARYLAND

OFFICE OF THE CITY MANAGER

25 CRESCENT ROAD, GREENBELT, MD. 20770

May 11, 2018



Nicole C. Ard
City Manager

Ms. Julie M. Schablitsky
Assistant Division Chief
Environmental Planning Division
Maryland Department of Transportation, SHA
707 North Calvert Street
Baltimore, MD 21202

Re: Study No. AW073A11
I-495 & I-270 Managed Lane Study
Section 106 Review

Dear Ms. Schablitsky:

The City of Greenbelt is in receipt of your letter dated, April 12, 2018, requesting comment on historic preservation issues as they relate to the I-495 & I-270 Managed Lane Study. The City appreciates the opportunity to comment and looks forward to being an active partner in the Section 106 process. This letter incorporates responses from the three consulting parties for the City of Greenbelt.

The Greenbelt City Council is on record in opposition to the proposed widening of I-495 and I-270 (letter attached). While the City's opposition extends beyond the Section 106 process, for the purpose of responding to your request, this letter will focus on issues relevant to the identification and protection of historically and culturally significant resources.

The City is very concerned about the impact that the proposed widening project will have on the historic character and integrity of Historic Greenbelt. Greenbelt is historically significant as one of three planned communities built through the Federal government's "Green Towns Program" during the Great Depression. Greenbelt is significant for its status as a national model for community planning and design. In November 1980, Greenbelt was listed as a Historic District in the National Register of Historic Places. The boundaries of the District were drawn to include areas of the City directly related to the establishment and expansion of the planned community between 1935 and 1941. In 1997, Historic Greenbelt was designated a National Historic Landmark. Within the "Area of Potential Effects" lay portions of the Greenbelt National Register Historic District, National Historic Landmark designated areas, the historic Walker Family Cemetery, Buddy Attick Lake Park, segments of the Baltimore Washington Parkway, portions of the United States Department of Agriculture's Beltsville Agricultural Research Center and portions of Greenbelt National Park.

A NATIONAL HISTORIC LANDMARK
PHONE: (301) 474-8000 www.greenbeltmd.gov



The proposed highway widening project's impact on Historic Greenbelt and significant historical resources is unacceptable. The resources listed above have significant value to the history and character of Greenbelt, as well as the State. These historic resources must be protected, as mandated under Federal Law. The City continues to strongly urge the State of Maryland to use its resources to improve alternative existing multi-modal transportation options (i.e., MARC, Metro service, bus transit and bike routes).

The proposed plan to widen the Capital Beltway infringes on Greenbelt's parkland, open space and Forest Preserve. These areas have been proven to be vitally important to a person's health and quality of life. The City has actively invested in the creation of forested open space. The City of Greenbelt's robust Recreation and Parks system is heavily used by Greenbelt residents, businesses and others from surrounding cities and counties. These award-winning, multigenerational and inclusive recreation programs, facilities and parks are of vital importance in a densely populated urban area. For these reasons, the Greenbelt Recreation Department opposes the proposed project.

Thank you for the opportunity to comment. The City looks forward to continued participation in the Section 106 process, as well as future planning processes. If you have any questions please contact Ms. Terri Hruby, Planning Director, at 240-542-2041 or by email at thruby@greenbeltmd.gov.

Sincerely,

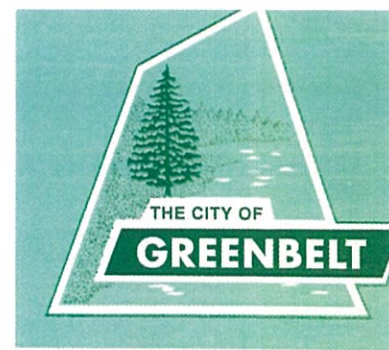


Nicole Ard
City Manager

cc: City Council
Terri Hruby, Planning Director
Julie McHale, Director of Recreation

CITY OF GREENBELT

25 CRESCENT ROAD, GREENBELT, MD. 20770-1886



October 23, 2017

The Honorable Lawrence Hogan, Jr.
Office of the Governor
100 State Circle
Annapolis, MD 21401

Re: Proposed Highway Widening Projects

Dear Governor Hogan:

CITY COUNCIL

Emmett V. Jordan, Mayor
Judith F. Davis, Mayor Pro Tem
Konrad E. Herling
Leta M. Mach
Silke I. Pope
Edward V.J. Putens
Rodney M. Roberts

The Greenbelt City Council is opposed to the proposed widening of I-270, the Capital Beltway (I-495) and the Baltimore-Washington Parkway (MD 295) to accommodate managed and/or toll lanes. These highway widening projects will not solve our region's road congestion problems.

Studies have shown that highway expansion projects ultimately do not relieve congestion. Instead research indicates that such projects encourage more driving, longer trips and increase suburban sprawl -which further stresses the environment, creates a greater maintenance burden to support an inefficient transportation network, and costs Maryland citizens time and money. In fact, the deficiency of this proposal was published in the 2012 Baltimore-Washington Parkway Widening Feasibility Study which concluded that:

"While a widened B-W Parkway will accommodate greater traffic volumes, the magnitude of increased travel demand on the facility generated by continuing anticipated regional population and employment growth will likely result in levels of traffic congestion similar to those experienced today."

The impact that the proposed highway widening projects will have on the natural, socioeconomic, cultural and built environments is unacceptable. Established neighborhoods adjacent to these highway corridors will be negatively impacted by a diminished quality of life, as will the users of the Parkway. Also, the natural and cultural significance of the Baltimore-Washington Parkway cannot be ignored. The Parkway is listed on the National Register of Historic Places, an indication of its significant value to the history and character of Maryland. This historic treasure deserves to be respected for its original function as a scenic byway. The segment of the Parkway that is owned by the National Park Service should be retained by the National Park Service. To transfer ownership to the State will threaten its historic designation, and most likely result in the byway being transformed by State of Maryland Highway standards, destroying its scenic and parkway setting.

In a time when communities are wrestling with environmental and socioeconomic challenges, proceeding with highway widening projects that do little to address the region's congestion, but have high environmental, human and financial costs, raises questions and concerns that need to be carefully considered. Before moving forward to construction of these projects, alternative congestion relief approaches should be studied and considered, including dedicating more funding to transit and other alternative modes of transportation. We need to allocate our limited resources to supporting the live, work and play philosophy by investing in transit oriented development and the infrastructure necessary to attract and sustain it.

The City strongly urges your administration to consider utilizing resources to expand and improve the existing alternative transportation routes. The MARC Train serves the Baltimore-Washington Corridor. Resources dedicated to improving MARC Train service hours would do more to relieve congestion on the Corridor while maintaining the unique beauty, and relief that the Parkway provides to the regional road network. The new economy cannot support a

A NATIONAL HISTORIC LANDMARK

(301) 474-8000 FAX: (301) 441-8248

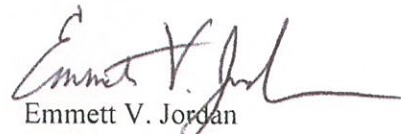
www.greenbeltmd.gov

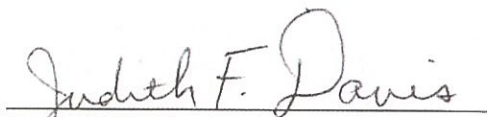


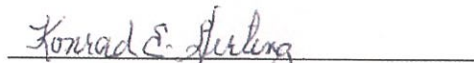
continued disconnect between transportation projects and land use development patterns that do little to support a sustainable future.

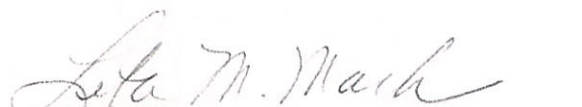
The City requests that you withdraw your support for the I-495 and I-295 widening projects, and allow an opportunity for the state transportation agencies to pursue other congestion relief approaches. We can collectively work together towards developing a plan that will relieve traffic congestion on our highways while minimizing impacts to the natural and built environment.

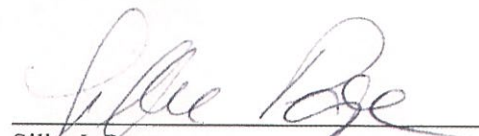
Sincerely,


Emmett V. Jordan
Mayor

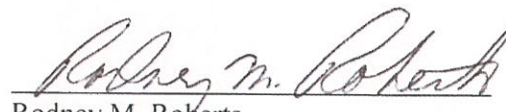

Judith F. Davis
Council Member


Konrad E. Herling
Council Member


Leta M. Mach
Council Member


Silke I. Pope
Council Member


Edward V.J. Putens
Council Member


Rodney M. Roberts
Council Member

Enclosure: Baltimore-Washington Parkway Widening Feasibility Study (November 2012)

cc: City Council
Senator Ben Cardin
Senator Chris Van Hollen
Congressman Steny Hoyer
Senator Paul Pinsky
Delegate Anne Healey
Council Member Derrick Davis
Council Member Dannielle Glaros
Council Member Andrea Harrison
Council Member Mary Lehman
Council Member Deni Taveras
Council Member Obie Patterson
Council Member Karen Toles
Council Member Mel Franklin
Four Cities Coalition
Nicole Ard, City Manager
Terri Hruby, Acting Director of Planning & Community Development



MONTGOMERY COUNTY DEPARTMENT OF PARKS
MARYLAND-NATIONAL CAPITAL PARK & PLANNING COMMISSION

May 18, 2018

Dr. Julie Shablitsky
Assistant Division Chief
Environmental Planning Division
Maryland Department of Transportation
State Highway Administration
707 North Calvert Street
Baltimore, MD 21202

Dear Dr. Shablitsky,

The Maryland-National Capital Park and Planning Commission, Montgomery Parks (Parks) has (by carbon copy) received your letter dated April 12, 2018 to Ms. Elizabeth Hughes, State Historic Preservation Officer, Maryland Historical Trust (MHT), concerning the proposed Study No. AW073A11, the I-495 & I-270 Managed Lanes Study (MLS), inviting MHT and local agencies to comment on MDOT's preliminary Area of Potential Effects (APE) and participate in the Section 106 process. As you know, M-NCPPC is a Cooperating Agency in the Interagency Working Group (IAWG). Representatives from Montgomery Parks' Cultural Resources Stewardship Section also participated in the May 3, 2018 meeting held at SHA's Baltimore office on the Section 106 process for this project. At that meeting, Parks was asked to submit comments to SHA on the preliminary APE and preliminary identification of cultural resources. We expect to refine and supplement these comments as the project progresses and the actual project impacts are defined more accurately.

As both Interstates 495 and 270 transect some of the most important cultural resources in the County, archaeological resources, historic objects and structures, and cultural landscapes will be adversely affected by the project. The heart of the County's park system, which originates in 1927, are its stream valley parks; these are all impacted by the proposed project. Due to concern for the loss of cultural resources, any alternatives considered must include a package of environmental and community stewardship mitigation projects that adequately offset the breadth of this major public works project.

The Preliminary Area of Potential Effects (APE)

The April 12, 2018 letter to MHT identifies two APE boundaries – one for direct impacts to National Register listed or eligible resources (the 300-foot from centerline Corridor Study Boundary), and a larger one for direct and indirect impacts (the Corridor Study Boundary plus an additional 250 feet to either side). Due to the lack of clarity on where the boundary for direct impacts lies at this time, Parks expects that MDOT/SHA will use the larger APE (which is

approximately 550' from the centerline) for *both* archaeology and standing structures assessments.

Identified Historic Resources on Parkland

There are two identified historic resources in the Project Area:

- Rock Creek Park Montgomery County Survey Area (M: 36-87)
- Sligo Creek Parkway (M: 32-15)

Within these linear stream valley park systems there are numerous contributing elements, some of which are strictly in the preliminary APE, others that are immediately outside but should be considered, and others that are yet to be identified. Joseph's Park Boundary Marker from 1817, for example, is an object within Rock Creek Park Stream Valley Unit 2. The Sligo Creek Golf Clubhouse is a building along the Sligo Creek Parkway in its Stream Valley Unit 3. There are other cultural resources in the preliminary APE that should be identified by SHA's consulting architectural historians.

Archaeology on Parkland

Currently, there are five recorded archaeological sites within the preliminary APE on parkland. These include:

- 18M0191 – Kavanagh XII site (Cabin John Regional Park)
- 18M0332 – Rock Creek Stream Valley site (Rock Creek Stream Valley Unit 2)
- 18M0457 – Booze Creek site (Cabin John Stream Valley Unit 2)
- 18M0510 – Rock Creek Hills #1 (Rock Creek Stream Valley Unit 2)
- 18M0602 – Fuster site (Northwest Branch Stream Valley Unit 3)

Based on preliminary research, none of these have been evaluated for their eligibility for inclusion on the National Register. In addition, large sections of the APE cross parkland in areas that have not been systematically surveyed for the presence of archaeological sites. As noted in the April 12, 2018 letter to MHT, SHA has identified 49 discrete areas in the overall project that appear to be undisturbed and will require additional testing. Parks requests a map identifying these areas so that we can contribute to them based on our knowledge of potential archaeological resources on parkland.

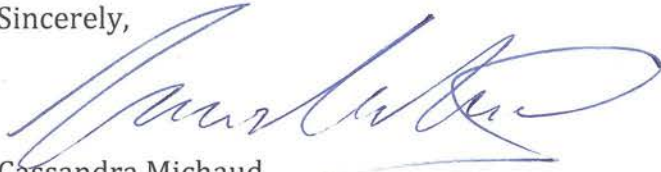
Additionally, Parks would like to inform SHA of a cemetery not currently noted on the maps provided in the April 12, 2018 letter to MHT. Gibson Grove Cemetery, which is not on parkland, lies within the preliminary APE on the west side of Seven Locks Road. The cemetery was divided from the Gibson Grove Church during the construction of I-495 years ago. It is listed as #105 on the Montgomery County Cemetery Inventory housed on the Planning Department website:

<http://montgomeryplanning.org/planning/historic/montgomery-county-cemetery-inventory/montgomery-county-cemetery-inventory-alphabetical/>

Parks encourages MDOT/SHA to consult this inventory regularly so as not to miss burial sites.

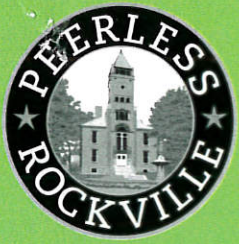
M-NCPPC, Montgomery Parks appreciates the opportunity to be a Cooperating Agency in the IAWG and specifically to consult with SHA on the Section 106 aspects of this project, which will have a significant impact to the cultural landscape of the county. We look forward to continuing to work with SHA on identifying and protecting cultural resources on parkland as the project moves forward.

Sincerely,



Cassandra Michaud
Senior Archaeologist, RPA

Cc: Beth Cole, Maryland Historical Trust
Jeanette Mar, Federal Highway Administration
Steve Archer, State Highway Administration
Jai Cole, M-NCPPC, Montgomery Parks, Acting Chief, Park, Planning and Stewardship
Matt Harper, M-NCPPC, Montgomery Parks, Natural Resources Manager
Doug Stephens, M-NCPPC, Montgomery Parks, Natural Resources
Joey Lampl, M-NCPPC, Montgomery Parks, Cultural Resources Stewardship
Julie Mueller, M-NCPPC, Montgomery Parks, Cultural Resource Stewardship
Rebecca Ballo, M-NCPPC, Montgomery Planning, Historic Preservation



Preserving Rockville's Heritage

August 27, 2018

Department of Transportation
State Highway Administration
707 North Calvert Street, Mail Stop P-601
Baltimore, MD 21202

To Whom It May Concern:

I write to you today on behalf of Peerless Rockville Historic Preservation's Board of Directors and members, concerning the proposed plans to expand interstate 270 and the harmful effects of the physical widening of I-270 will have on the historic resources and community fabric of the City of Rockville and Montgomery County.

Peerless Rockville is a nonprofit, community-based organization founded in 1974 to preserve buildings, objects, and information important to Rockville's heritage. We advance our goals through education, example, advocacy, and community involvement. As a historic preservation advocacy organization, we are deeply concerned about the potential impact of the I-270 expansion project on Rockville's historic resources as well as the identity of its unique neighborhoods that this project threatens.

The City of Rockville has many neighborhoods representing its development over time. The post-war years featured a boom in housing and construction that resulted in expansion and growth of the City and formed the modern communities that thrive today. Development and consideration of historic contexts should include a focus on the post-war, Mid-Century, and late 20th century built environment. Although not currently listed as historic, many communities within the area of potential effects meet National Register eligibility criteria.

For example, the neighborhood of New Mark Commons was recently added to the National Register of Historic Places as an exemplary illustration of "Situated Modernism," combining clustered and free-standing houses within a rolling, wooded landscape. Other neighborhoods like this exist all along the I-270 corridor. Many of Rockville's neighborhoods were constructed during this period to take advantage of the "new" highway infrastructure. We are gravely

concerned by any option for I-270 expansion that widens the footprint of the roadway in Rockville, threatening these long-standing communities, and we strongly urge you to choose alternate plans.

As a designated consulting partner to 106 Review, Peerless Rockville looks forward to working with SHA and other partners in protecting Rockville and Montgomery County's important historic resources throughout this study. As a community advocate, we stand strong in our desire to protect the rich heritage of our community.

Peerless Rockville Historic Preservation, Ltd. possesses an abundance of materials on Rockville's history, heritage, and historic homes and sites. We encourage all researchers and consultants documenting areas impacted by the I-270 expansion project to visit our office and utilize our archives and collections located in the historic Old Red Brick Courthouse in downtown Rockville.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Pickard". The signature is written in dark ink and is positioned above the printed name.

Nancy Pickard

Executive Director

CC:

City of Rockville Mayor & Council

City of Rockville Historic District Commission

Elizabeth Hughes, State Historic Preservation Officer

From: Sarah Rogers <director@heritagemontgomery.org>
Sent: Monday, September 24, 2018 3:21 PM
To: Steve Archer <SArcher@sha.state.md.us>
Subject: Re: MDOT SHA I-495/I-270 Managed Lanes Study Section 106 Update

Replying to MDOT SHA Managed lanes study – keep us on the list.
Sarah L. Rogers
Heritage Montgomery

From: David, Gail <Gail.David@montgomerycountymd.gov>

Sent: Wednesday, November 7, 2018 2:31 PM

To: Steve Archer <SArcher@sha.state.md.us>

Cc: Jeanette Mar, FHWA <jeanette.mar@dot.gov>; David Clarke, FHWA <david.clarke@dot.gov>; Caryn Brookman <CBrookman@sha.state.md.us>; Beth Cole, MHT <beth.cole@maryland.gov>; Tim Tamburrino, MHT <tim.tamburrino@maryland.gov>

Subject: Re: I 495/I-270 Managed Lanes Study Agenda and online/call-in information for Section 106 Consulting Party Meeting Tuesday, November 13

Hi Steve,

I apologize but I will not be able to attend this meeting. Please continue to keep me on the emails. Thank you!

Gail David

Deputy Warden, Operations

Department of Correction and Rehabilitation

22880 Whelan Ln.

Boys, Maryland 20841

240-773- 9928 (MCCF)

240-773-9975 (fax #)

240-777-9817 (MCDC)

gail.david@montgomerycountymd.gov

From: Jim Wasilak <jwasilak@rockvillemd.gov>

Sent: Monday, November 19, 2018 4:50 PM

To: Steve Archer <SArcher@sha.state.md.us>

Cc: Sheila Bashiri <sbashiri@rockvillemd.gov>; Ricky Barker <rbarker@rockvillemd.gov>

Subject: RE: I-495/I-270 MLS Section 106 Consultation: documents available and November 13 Consulting Party Meeting

Steve: The City of Rockville does not have comments on the Gap Analysis or Suburbanization Context Addendum at this time. However, the City does want to continue as a consulting party, so please keep Sheila Bashiri and myself on your list. I have let Matt Manning know that the City has development files on many of the properties listed in the Newly Identified Buildings and Districts chart within Rockville, and we will be forwarding that info to him over the coming weeks.

Thanks, Jim

R. James Wasilak, AICP
Chief of Zoning
Department of Community Planning and Development Services
City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
240-314-8211 (direct)
240-314-8200 (CPDS main)
jwasilak@rockvillemd.gov





MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

November 19, 2018

Steve Archer
Cultural Resources Team Leader
Environmental Planning
MDOT State Highways Administration
707 North Calvert Street
Baltimore, MD 21202

RE: I-495/I- 270 Managed Lanes Study, Section 106 Comments

Dear Mr. Archer:

Thank you for providing the opportunity to review and comment on the latest Section 106 review materials as part of the I-495/I-270 Managed Lanes Study. **These comments reflect the comprehensive comments from the Cultural Resources Sections of the M-NCPPC Montgomery County Parks and Planning Departments.**

Gap Analysis

The Gap Analysis and Suburban Context Addendum documents add significantly to the original context for this project and will be a useful tool in assessing the architectural and planning aspects of the sites that may be affected by the proposed project. While clearly a great deal of effort went into researching and writing it, we nonetheless find that it lacks certain crucial information, and the consultant did not tap certain sources, and local context is underrepresented, both in the sections on the built environment and archaeology. The Gap Analysis and Addendum lack substantive information on the social and cultural aspects of the potentially affected neighborhoods (Criterion A). While providing a thorough study of the transportation and mainstream developer-generated housing, the analysis to date also omits a discussion of those who lived in Montgomery County outside of majority-white neighborhoods. For instance, were any of the possibly affected neighborhoods associated with Montgomery County's African American history, or the history of the large influx of Asian and Latino communities into the County? Around 40% of Montgomery County's population was enslaved in the first half of the 19th century. After the Civil War, freedmen and women settled across Montgomery County, many in areas that are in proximity to the proposed project. These settlements were regularly omitted from the historical documents most commonly used by researchers and alternative methods for their identification are often required. Similarly, were any of the communities studied Jewish or representative of other excluded groups as a result of being shut out of communities due to restrictive covenants? These important historical aspects are not taken into consideration in the document or as part of the survey strategy.

Archaeological Context

There are four known or potential cemetery locations within the APE for the project: Gibson Grove AME Church Cemetery; Ball Family Cemetery; St. John the Evangelist Catholic Church Cemetery (Forest Glen Cemetery); and The Poor Farm site and cemetery (18MO266). The Gap analysis lacks the Ball Family burial ground, which included at least two interments dating to 1855 and 1862. The stones were removed from the vicinity of I-270 and Montrose Road in the 1950s prior to the construction of the interstate

highway. The stones survive and are stored nearby. Montgomery County Cemetery Inventory files contain leads regarding the original burial site location within the project APE.

The St. John the Evangelist Cemetery is referenced in the gap analysis indirectly as part of the Forest Glen historic district. The discussion in the gap analysis makes no mention of the cemetery, but focuses exclusively on late 19th-century suburban development. The cemetery comprises nearly half the physical area of the district, and the first interment (the mother of John Carroll, first catholic bishop in the United States) dates to 1796. There are several notable early 19th-century headstones made of Seneca Sandstone, the same striking red stone used to build the church. The cemetery boundary is very close to, and possibly within the corridor boundary. Approximately half the cemetery, including the original location of the 1770s church, are within the architecture APE.

Generally, the archaeological context appears to be largely derived from research conducted in environmental settings of the Coastal Plain, with little focus on the Piedmont, which comprises most of Montgomery County. This context should be corrected.

Requested Next Steps

We welcome the offer of MDOT/SHA to have locality/consulting party specific meetings. Montgomery County would like to host such a meeting, and would work with SHA to invite County-specific stakeholders to the discussion. At this meeting we could work with MDOT/SHA to introduce the team and consultants to our extensive research files. This would also be an ideal opportunity to provide information from the Montgomery County Cemetery Inventory so that the potential effect to cemetery sites within the APE are adequately considered.

We also request that as Determination of Eligibility forms (DOEs) are sent to MHT for review, that these forms be concurrently transmitted to M-NCPPC (both Montgomery Planning and Montgomery Parks) so that we may also review and provide comments. Handling the property-specific reviews in smaller batches will enable us to provide feedback and analysis on a rolling basis, instead of having to review the entire set of DOEs at once near the end of the documentation phase of the project.

We also request that future Consulting Parties meetings provide initial assessments and analysis of impacts to Cultural Resources under 4F and NEPA. Some resources may have more stringent protection requirements under 4F and it would be helpful to understand and review any analysis that may have informed decisions on choosing a Preferred Alternative at the next and at all future meetings.

We would also like to thank the MDOT/SHA project team for providing the requested archaeological survey information and GIS maps after the last Consulting Parties meeting on November 13th. Given that it is standard practice to allow 30-days of review of new information, M-NCPPC requests until COB Friday, December 14, 2018 to fully review this extensive material, including the archaeological survey areas that we have just received digitally. This is a large, complex project and, as such, requires adequate time to evaluate from the outset the framework for identifying and evaluating potential historic properties, as required under Section 106 of the National Historic Preservation Act. We also look forward to reviewing the final reports for the Phase I archaeological assessments currently underway.

Thank you again for the opportunity to comment. If you have any questions or need to discuss this matter, please feel free to contact us at 301-563-3404; Rebeccah.Ballo@montgomeryplanning.org, or 301-563-3414; Joey.Lampl@montgomeryparks.org.

Sincerely,



Rebecca Ballo
Historic Preservation Supervisor, Montgomery County Planning



Joey Lampl,
Cultural Resources Manager, Montgomery County Parks

cc: Jeannette Mar, FHWA
Jason Shellenhammer, RKK
Tim Tamborino, Maryland Historical Trust
Beth Cole, Maryland Historical Trust
Carol Rubin, Montgomery Planning
Matt Harper, Montgomery Parks
Doug Stevens, Montgomery Parks
Cassandra Michaud, Montgomery Parks

Post Office Box 4661
Rockville, MD 20849-4661
Web: www.montgomerypreservation.org
Email: mpi@montgomerypreservation.org

Montgomery Preservation Inc.

Promoting the Preservation, Protection and Enjoyment of Montgomery County's Rich Architectural Heritage and Historic Landscapes

November 19, 2018

Steve Archer, Cultural Resources Team Leader
Environmental Planning Division, State Highway Administration
Via email

Re: Section 106, 495/270 Managed Lanes Study

Dear Steve,

I write on behalf of Montgomery Preservation Inc. (MPI) to offer general comments about the referenced project. We are impressed by the scope of the study and its identification of resources, districts, and parks from which to pare down historic places that may be affected. Please know that MPI has a strong interest in this wide-ranging project, and we pledge to work with all parties to facilitate the process.

Of the 160 Montgomery County properties identified in all of the categories, many fall into the suburbanization context. We are pleased that the date was extended to 1978, as important planned communities are now included along with individually notable structures. Others pre-date this late 19th to mid-20th century era. Some are listed in the National Register and/or designated locally by Montgomery County or a municipality such as Rockville.

MPI is just completing its Montgomery County Cemetery Inventory Revisited project which, as it updated efforts from a decade ago, utilized advanced technology and additional data to better document 323 known burial sites throughout the County. Four sites (Ball Cemetery ID# 279, Gibson Grove #105, MoCo Poor Farm #196, and St. John the Evangelist #131) are appropriately identified in your study.

If the APE is enlarged at any point in this process, and you want to broaden the study to include farther north sites such as Comsat or Moneysworth farm (both in Clarksburg) and other burial sites (such as Scotland in Rockville), we will help to provide additional information.

Lastly, MPI encourages you to meet in the near future with Montgomery County Historic Preservation and Parks staff, and include MPI, to more specifically discuss our County resources and to coordinate efforts. There is no doubt that this highway project will have major effects on Montgomery County.

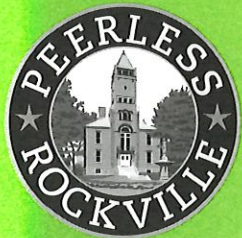
Sincerely yours,

/s/

Eileen McGuckian, president
Montgomery Preservation Inc.
Consulting Party

- General: The Gap Analysis only focuses on Maryland and does not look at Virginia, as it states: "Section 106 requirements for both archaeology and historic architecture in Virginia for this project are being addressed separately by the Virginia Department of Transportation for their ongoing project to extend the American Legion Memorial Bridge High Occupancy Toll (HOT) Lanes to the George Washington [Memorial] Parkway." Curious if this VDOT project covers the entirety of the MLS project area in Virginia. It would be helpful to see a graphic highlighting the two project areas to verify there will be complete coverage of the MLS project area within Virginia, as well as to ensure resources under the administration of the George Washington Memorial Parkway are properly identified (e.g., archeological sites).
- General: The Gap Analysis does not discuss underwater archeology or the potential for submerged cultural resources to exist within the project area. Given that a portion of the project area crosses the Potomac River at the American Legion Bridge, the potential for such resources to exist must be assessed. This includes expanding the historic context to include early maritime activities that took place within and adjacent to the project area and examine the potential for submerged cultural resources to be present.
- Section 1.1.1, p. 3: Please use the full, official name of the 'George Washington Memorial Parkway' in this report and subsequent project documentation (as opposed to the colloquial 'GW Parkway') - GLOBAL.
- Section 2.1 Background Research: There are other documentary sources related to CHOH that would be of use for a desktop survey of archaeological resources including Berger's 9-year study of the canal (Fiedel et al 2005). I realize that the survey did not include property within the MLS study area, but would provide a broader context. (Also applies to 4 Regional History).
- Section 2.3.2 Criteria for Archaeological Potential-- How are they determining "previous disturbance" in determining if an area has archaeological potential?
- Section 2.4.1 Previously Identified Historic Resources-- Text only references state data. Should include Federal (NPS) data from the parks.
- Section 4.1.1, p. 17. Recommend correcting the date in the section header from '1100 BC' to '11,000 BC.'
- Section 5.1.1 Previous Archaeological Surveys-- More survey needs to be done on the CHOH. Yes, agree. Fieldwork should be planned for the fall or winter when ground visibility is best. Nearby archaeological surveys have been unable to identify previously recorded sites due to vegetation (e.g. Kavanaugh 1981). Why did NPS deny survey applications for Diamanti et al. 2008? The reason should be stated.
- Section 5.1.2.B, p. 47. Recommend removing the underscore from the first paragraph.
- Section 6.2.1, p. 55. The text in the 'Significance' section for the Suitland Parkway appears gray, whereas the other text is black. Recommend correcting.
- Section 7.5.2, p. 104. There appears to be a random page break in the middle of the page.
- Section 7.6. I realize that the C&O Canal locks are mentioned several times and they appear in figures (e.g. Figure 19), but nowhere is there specific mention of Locks 12, 13, and 14, which are directly under the ALB and within the APE and project corridor.
- Section 7.6. Good, yes, survey is recommended at CHOH.
- Section 8.1, p. 112. In the second paragraph, numbers less than ten are provided numerically and are also spelled out.

- Section 9.2. List the National Park units as well. In addition, C&O Canal is a historic district (NR listed)
- Appendix D, Map 2. Survey area S-12 partially overlaps with site 18MO22 (Potter site), so it would therefore be beneficial for the survey team to do limited fieldwork at the site to determine if any portion of it remains undisturbed, especially since they will already be in the area (see Section 7.4, p. 93 for details/recommendations).
- Page 51. Location: Change to "Cumberland, MD."
- Page 51, Period of Significance: The 2015 update to the C&O Canal NHP Historic District National Register nomination included an extended period of significance. Prehistoric and historic resources begins and continues the period from 9000 BCE through the original 1828 to 1924 period of significance (when the canal was built and operated). After the canal ceased commercial operation in 1924, a noncontiguous period of significance takes in the New Deal-era years of 1938 to 1942 for the district's association with Civilian Conservation Corps activity, and 1965 for the district's association with the NPS Mission 66 program.
- Page 51, NRHP: In 2015, the C&O Canal NHP Historic District National Register nomination was updated and the boundary was increased.



Preserving Rockville's Heritage

Steve Archer
Maryland Department of Transportation State Highway Administration
Cultural Resources Team Leader
Cultural Resources Section
Environmental Planning Division
707 North Calvert St
Baltimore, MD 21202

November 19, 2018

To Whom It May Concern,

Peerless Rockville writes to you today regarding the numerous properties potentially impacted by expansion of the I-270/495. The area in question contains hundreds if not thousands of homes and neighborhoods, businesses, and other developed properties that make up the fabric of the community of the City of Rockville. We thank you for the opportunity to participate in the review of the landscape representing Rockville's important and varied development during the modern period.

The 1950s in Rockville are defined by explosive population (over 200% growth) and doubling in land size. Early communities representing this growth include parts of the **West End**, and **Roxboro**. It should be noted that tiny Roxboro also has 1940s growth, predating the intensity of the post-war period.

Rockville's transportation infrastructure improvement and plans around this time, including I-270, led to the development of the neighborhoods of **Woodley Gardens**, **New Mark Commons**, and **Rockshire**.

Woodley Gardens is a "modern" neighborhood that bears the distinction of being one of Rockville's earliest pre-planned communities. At Woodley Gardens Colonial-inspired brick houses and apartments sit on streets with floral names such as Azalea, Crocus, Lily and Carnation. The neighborhood with its mix of homes, townhouses and co-operative apartments also boasts recreational and community amenities not found in most earlier housing developments. Monroe Warren Sr. and Monroe Warren Jr. developed Woodley Gardens using an innovative planning approach, which combined multiple housing types, with open space for natural features and recreation, and added a community shopping area.

In the early 1960s, veteran builder Monroe Warren Sr., known for earlier apartment and housing

developments in Washington D.C. as well as the Rockcrest neighborhood in Rockville, began construction on the western edge of Rockville. Here he and his son strove to create a community of high quality “prestige” homes. The conventional architectural style of the homes extended throughout the community and with the inclusion of tennis courts, baseball fields and an Olympic-sized swimming pool. The community amenities proved attractive to homebuyers, many of whom located to Rockville to work at government agencies that expanded to Montgomery County.

New Mark Commons has recently been added to the National Register of Historic places as a superior example of mid-century architecture and development patterns representing the physical, social and economic fabric of Montgomery County and Rockville during this period of growth and change.

A “situated modernism” community, New Mark Commons was designed by homebuilder Edmund J. Bennett and the modernist architecture firm Keyes, Lethbridge & Condon to harmoniously integrate the various housing types and community amenities with preserved natural features. The specific design of each home was selected based on which model best fit the natural topography and modern homes were clustered on courts and cul-de-sacs. New Mark Commons was the first PRU (Planned Residential Unit development) in Rockville and retained high integrity as a significant modernist community.

Rockshire is the largest of the Planned Residential Units (PRU) zoned in Rockville, which permitted greater flexibility in the layout of the subdivision so that other community goals, such as open space, could be achieved. Single family homes, townhouses, churches, and schools are located in this community. Within Rockshire and its neighboring Fallsmead are approximately 150 acres of city-owned parkland. Rockshire illustrates how a modern community and 19th century structures can co-exist and be integrated within the natural environment.

Rockshire’s initial developers were Community Builders, led by Albert Small and Hermen Greenberg, whose *Southern Engineering* would eventually build more than 20,000 homes, condominiums, and office buildings throughout the DC metropolitan region. The planning for this neighborhood employed clustering, laying out smaller lots, conscious of the environmental features of the landscape.

The communities that developed alongside Watts Branch in the 1970s invited people to an environmentally sensitive watershed. Historically populated by farms near the early 19th century Wooton’s Mill that utilized Watts Branch in its operations, construction here met the challenge of being environmentally sensitive while building coherent neighborhoods combining large modern homes and community amenities.

The environmental work of Luna Leopold (1915-2006), famed American geologist and hydrologist, influenced the management of Watts Branch Stream Valley Park. Leopold’s ground-breaking 40-year study of Watts Branch revealed the effects of suburbanization on the environment.

These neighborhoods and the others that began in the 1960s and 1970s, including **Fallswood, Saddlebrook, Markwood, Briarglen, North Farm and Montrose Wood**, are intrinsically connected to the transit systems that enabled commuters to travel from to workplaces throughout the capitol region.

These residential developments were accompanied by an increasing need for schools, churches, shopping centers, office buildings, libraries, medical, health care, and recreation facilities. Virtually every aspect of life in suburbia – shopping, employment, education, recreation, religious worship – was geared to “Car Culture” and was designed to accommodate the family car and suburban mobility made possible by transportation infrastructure.

New school construction followed patterns of residential development throughout the area as planners and public officials struggled to keep pace with suburban growth. In all, 23 new elementary, middle, and high schools opened in Rockville between 1950 and 1971. **Julius West Middle School** (1961) was part of this pattern.

Similarly, the growing population needed more and larger religious institutions. By 1960, the number of churches and religious institutions in Rockville had more than doubled. Rockville’s established churches adapted to the population boom by enlarging existing church facilities or relocating and rebuilding on new sites, as did both the Rockville Christian Church and the First Baptist Church.

First Baptist Church (from Teresa Lachin’s *Recent Rockville*)

Established in 1821, the First Baptist Church (1908) was located near the center of Rockville on Jefferson and Washington Streets. An Education Building (today the Garza Building) for Sunday school classes was built in 1958, and two years later the congregation purchased an adjacent property on Washington Street for a Colonial-style sanctuary to house its growing membership.

Fund-raising and parking space for the new million dollar facility proved difficult, and in 1968, the congregation sold their properties in town and purchased nine acres of undeveloped land one mile west of the downtown area at the intersection of 70-S (today I-270) and Route 28. The new site offered room for future expansion, ample parking space, convenient access to major roads and new neighborhoods, and visibility along a well-traveled interstate corridor. In making a fresh start at the new location, the congregation abandoned plans for a traditional Colonial-style church and directed their architect, Russell Jenkins of McClean, Virginia, to design “something modern-looking,” a multi-purpose facility with a sanctuary, offices, meeting space, and classrooms.⁴² Jenkins’ preliminary design for a 1,500-seat sanctuary was reduced in scale to meet site requirements and budget restraints. A revised design for a modernist two-story brick building with a dramatic folded plate roof and broad sheltering canopy over the main entryway was approved and built. A spacious foyer leads into the fan-shaped sanctuary, which is illuminated by clerestory windows under the roofline and exposed wooden beams.

Anticipating demolition of the 1908 Church on Washington Street, the congregation salvaged two large stained glass windows and installed them in the entry hall of the new facility. In 1973,

the Church transferred ownership of its historic Baptist Cemetery near the old Church to the protection of the Montgomery County Historical Society. Ten years later, ownership and care of the Cemetery was transferred to Peerless Rockville Historic Preservation, Ltd.

Healthcare & Technology

Nursing homes and retirement communities opened during the 1970s near the burgeoning communities of Fallsmead and Rockshire west of 70-S (today I-270). The Collingswood Nursing and Rehabilitation Center on Hurley Avenue was completed in 1972; the Rockville Nursing Home in Roxboro in 1976, and Potomac Valley Nursing and Wellness Center in 1964.

Proximity to federal research institutions, such as the National Institutes of Health and Naval Medical Center, and long range City planning initiatives helped foster Rockville's impressive postwar development as a prime location for scientific endeavor.

Population growth brought increasing numbers of science professionals and college-educated residents to the area, creating imperatives for modern health care and state-of-the-art medical facilities. Equally important to this development were the availability of affordable building sites and a pool of trained architects, builders, developers, and labor force to plan, design, and construct medical and scientific properties. Commercial buildings in area should be evaluated for involvement in the Human Genome Project, which occupied numerous large-scale buildings in and around the Rockville area in the later part of the 20th century.

Commercial Retail, Offices, & Industry

Development along Rockville Pike and other major roads followed on the heels of residential and commercial development, drawing customers away from downtown Rockville to new strip malls and shopping centers, such as Seven Locks Plaza.

By the late 1950s, unprecedented numbers of new office buildings were being planned, completed, or under construction. Like new schools and churches, Rockville's commercial and institutional architecture was predominantly modernist in design, affording curtain wall construction, versatile open interior spaces, and use of technologically innovative building materials. By contrast, legal office buildings of the 1960s and 1970s were more generally more traditionally styled with brick construction and Colonial-inspired details.

Decentralization of federal agencies (e.g., National Bureau of Standards, Atomic Energy Commission) to the suburbs fostered a generation of consulting firms offering professional expertise in science, industry, communications, and emerging technologies.

Other:

Detention Center:

Examples of Brutalist architecture in Rockville include the **Montgomery County Detention Center**. The architectural style known as Brutalism originated during the postwar era and takes its name from *béton brut*, a French term used by Swiss architect Le Corbusier for unfinished, sometimes raw, concrete used on exterior facades of large-scale buildings. Brutalism emerged in part as a reaction to the skeletal profile of the Miesian grid and purist geometry of the International Style. Le Corbusier's *Unité d'Habitation* (1948-1954) in Marseille, France, is considered a landmark example of the style. Brutalist buildings are blocky and starkly geometric with heavy surfaces of exposed concrete that express the mass and construction of design. Doorways are placed within cavernous entry plazas; windows are recessed and fenestration is frequently minimal (Definition description from Teresa Lachin's Recent Rockville).

Poor Farm:

Construction of roads and buildings during the past 60 years has almost obliterated all traces of the Montgomery County Poor Farm and the Poor Farm Cemetery. Despite construction, and the removal of burials, the site has historic significance. During a site visit in September 2018 a trash pit, likely associated with the Poor Farm, was located next to an office building at 1101 Wootton Parkway. While the cemetery site has been heavily disturbed by decades of construction, it may still contain burials, or other subsurface objects of historic significance. Even a systematic excavation of a cemetery will often miss burials, and given the nature of this cemetery, with many unmarked graves, and the haphazard way in which it has been excavated, there is a possibility that intact graves remain on the site.

Note: Burials impacted by construction earlier transportation infrastructure, I-270, the expansion of I-270, and the construction of 1101 Wootton Parkway were most often removed by workers from Snowden Funeral Homes and relocated to Parklawn Cemetery. Some burials were removed by an archaeological crew working for the National Park Service (1987-88) and were sent for study, but appear to have been returned and reinterred, likely at Parklawn. All burials which were removed have not been confirmed to be re-interred at Parklawn, although that is what has been verbally reported by Snowden representatives on several occasions. Snowden has not granted access to its records to researchers. Parklawn has graciously opened records to researchers and accompanied us to the burial plot, which is marked.

11807 Dinwiddie Drive:

This structure contains part of the original 1918 two-story frame house belonging to the O'Neale family of planters who made a land claim in 1769, and willed the property including 68 acre farm to descendants. The farmhouse is likely one of few surviving structures from this early 20th century agricultural period.

Research Library & Other Resources

Peerless Rockville, a non-profit historic preservation advocacy organization, possesses a research library that contains information on the history of many of these modern properties. We invite you to visit us to learn more about many of the listed addresses.

The City of Rockville has engaged consultants to produce a study of Rockville's historic contexts which will be relevant to your interests. We also recommend Teresa Lachin's publication "Rockville's Recent Past" (2012), from which much of the subject of this letter is sourced, for more information on this time period.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Pickard". The signature is fluid and cursive, with the first name "Nancy" and last name "Pickard" clearly distinguishable.

Nancy Pickard

Executive Director

From: [Smith, Kathryn](#)
To: [Steve Archer](#)
Subject: Re: [EXTERNAL] I-495/I-270 MLS Section 106 Determination of Eligibility forms, Batch 4 Posted, comments requested by Feb. 28, and additional info
Date: Tuesday, February 26, 2019 6:25:37 PM

Steve,

The following are comments for your consideration as you prepare the documentation on historic properties within the APE:

First, I noticed that some of the DOE forms say they are just documenting earlier determinations done by MHT -- saying they are not eligible in 2000. Should these properties be re-evaluated in 2019 since nearly 20 years has passed? (examples: PG:73-24; PG:73-22; PG:73-23).

Also, I am wondering if the roadway and its alignment itself has been evaluated for NR eligibility? Records show that the Olmsted firm worked on the Beltway project, at least in the area where it crosses Rock Creek Park in Montgomery County (near Connecticut Ave.). Apparently the planners wanted it to be parkway-like in this segment and so they hired Olmsted. According to my colleague, there's a job- number and associated records in the Olmsted records. You can search the records here: https://www.nps.gov/frla/olmstedarchives.htm#CP_JUMP_4037582

Best,
Kathryn

Kathryn G. Smith
National Historic Landmarks & National Register Coordinator
National Capital Region, National Park Service

1100 Ohio Drive, SW
Washington, DC 20242
202.619.7180
202.401.0017 fax

kathryn_smith@nps.gov

NCR Website <https://www.nps.gov/RESSNCR>

NHL Website <http://www.nps.gov/nhl>

Facebook [National Historic Landmark Program - NPS](#)

Instagram [NationalHistoricLandmarkNPS](#) #NationalHistoricLandmark #FindYourPark

On Thu, Feb 7, 2019 at 2:56 PM Steve Archer <SArcher@sha.state.md.us> wrote:

Greetings Consulting Parties,

From: Eileen McGuckian <phileen3@verizon.net>

Sent: Tuesday, March 26, 2019 3:35 PM

To: Steve Archer <SArcher@sha.state.md.us>

Subject: comments for I-495/I-270 MLS Section 106 Consultation: comments on Batch 5

Hello Steve and all,

Thank you for posting Batch 5 of the determination-of-eligibility (DOE) forms for this project.

On behalf of Montgomery Preservation, I have a few comments.

In batch 5, 11807 Dinwiddie Drive in Rockville is listed as the John Henry O'Neale house and is briefly mentioned in the DOE form for Montrose Woods M 30-48.

However, although this individual property is in your batch list, there is no separate DOE form for it.

Full disclosure: This has been my home for 30+ years, and I did meet the surveyors when they visited one frosty day this winter, but have heard nothing further.

I have conducted research on this house, which I describe as the O'Neale-Prichard-Cantelon/McGuckian house for its three owners 1865-present, and would be happy to provide it to you in an appropriate format.

The other comment relates to the archaeological aspect of this consultation:

Shouldn't the identified burial sites be included with each batch?

Again, full disclosure: Two grave markers from Ball Cemetery (ID#279 on the Montgomery County Cemetery Inventory) are on my property (address above). They were moved from their original, nearby site by previous owner Ann Prichard in the late 1960s and are now safely indoors.

Again, I have conducted research on this burial site, including oral histories of individuals who recall the cemetery. And again, I would be happy to provide information to you in an appropriate format; best would be the Cemetery Inventory-Revisited survey form.

Lastly, other burial sites within the APO should be identified in the DOE process: Gibson Grove Cemetery ID#105, the Montgomery County Poor Farm Cemetery ID#196, and St. John the Evangelist Cemetery in Forest Glen ID#131.

Please confirm that you have received this communication.

Sincerely,

Eileen McGuckian, president
Montgomery Preservation Inc.



MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

March 28, 2019

Steve Archer
Cultural Resources Team Leader
Environmental Planning
MDOT State Highways Administration
707 North Calvert Street
Baltimore, MD 21202

RE: I-495/I- 270 Managed Lanes Study, Section 106 Determination of Eligibility Forms, Batch 5 Comments

Dear Mr. Archer:

Thank you for providing the opportunity to review and comment on the latest Section 106 Determination of Eligibility (DOE) forms as part of the I-495/I-270 Managed Lanes Study. Please see the below comment(s) on the following DOEs:

- 1) Property Name: Holy Cross Hospital
Address: 1500 Forest Glen Road, Silver Spring, 20910
Batch: 5

Holy Cross Hospital warrants a full DOE rather than a Short Form DOE for ineligible properties. The architecture firm of Faulkner, Kingsbury & Stenhouse, who specialized in modernist institutional buildings in the postwar era, designed the hospital. Architect Slocum Kingsbury, FAIA (1893-1987), graduated from Cornell University, served in World War I, and practiced architecture in New York City before moving to Washington, D.C. Kingsbury specialized in hospital design and the building received a Washington Board of Trade Award and AIA Potomac Valley Award in 1964.

While Holy Cross Hospital has had alterations/additions to the main building and though the determination may remain static, the complex should be re-evaluated within a full historic context. Please refer to the following book for more information: Clare Lise Kelly, *Montgomery Modern* (Silver Spring, MD: M-NCPPC, 2015).

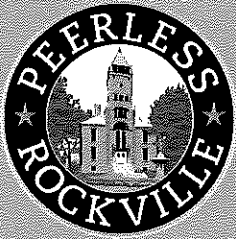
Thank you again for the opportunity to comment. If you have any questions or need to discuss this matter, please feel free to contact me at 301-563-3405 or John.Liebertz@montgomeryplanning.org.

Sincerely,

John Liebertz
Historic Preservation Specialist, Montgomery County Planning

cc: Rebecca Ballo, M-NCPPC, Planning HP Supervisor

Joey Lampl, M-NCPPC, Parks Cultural Resources Stewardship Manager
Julie Mueller, M-NCPPC, Parks Cultural Resources Stewardship Planner Coordinator
Cassandra Michaud, M-NCPPC, Parks Cultural Resources Archaeologist
Brian Crane, M-NCPPC, Planning Archaeologist
Jeannette Mar, FHWA
Tim Tamborino, MHT
Jason Shellenhammer, RKK
Beth Cole, MHT
Eileen McGuckian, President, Montgomery Preservation, Inc.
Nancy Pickard, Executive Director, Peerless Rockville



Preserving Rockville's Heritage

Maryland Department of Transportation State Highway Administration
Cultural Resources Team Leader
Cultural Resources Section
Environmental Planning Division
707 North Calvert St
Baltimore, MD 21202

March 28, 2019

To Whom It May Concern:

Peerless Rockville writes to you today regarding the numerous properties listed in Batch 5 of the Determination of Eligibility that are potentially impacted by expansion of the I-270/495. The area in question contains hundreds if not thousands of homes and neighborhoods, businesses, places of worship and other developed properties that make up the fabric of the community of the City of Rockville. We thank you for the opportunity to participate in the review of the landscape representing Rockville's important and varied development during the modern period.

Overall, we assert that greater investigation of potential association with significant individuals and events is required for the neighborhoods in and near Rockville before determined ineligible, particularly given the size and period of history represented in the area.

For instance, **4 Choke Cherry Road** is a Mid-twentieth century Brutalist-influenced building constructed in 1974 which retains much of its original character. Current occupants include the Montgomery County Public School Center for Technology Innovation, Project Reboot (providing computer systems to low income families). We note that no data is provided on its architects, builders, or past occupants. This information should be obtained and evaluated before eligibility can be determined.

The **West End Park Section 2** was platted in 1890 as part of West End Park. The community reflects a broad range of single-family residential development patterns, beginning in the 1890s and continuing until the present, with the largest periods of growth in the early 1950s and the 1960s. A variety of firms and architects were responsible for creating the area, including initial development by Henry Copp and Reuben Detrich, also known for their work in Garret Park and Kensington respectively. In the 1960s, development was primarily by James E. Cafritz, also known for Aspen Hill Park and Laurel Grove.

Rockshire Village is functionally part of Rockshire, the largest of the Planned Residential Units (PRU) zoned in Rockville, which permitted greater flexibility in the layout of the subdivision so that other community goals, such as open space, could be achieved. Single family homes, townhouses, churches, and schools are located in this community. Within Rockshire and its

neighboring Fallsmead are approximately 150 acres of city-owned parkland. Rockshire illustrates how a modern community and 19th century structures can co-exist and be integrated within the natural environment.

The planning for this neighborhood employed clustering, laying out smaller lots, conscious of the environmental features of the landscape. The communities that developed alongside Watts Branch in the 1970s invited people to an environmentally sensitive watershed. Historically populated by farms near the early 19th century Wooton's Mill that utilized Watts Branch in its operations, construction here met the challenge of being environmentally sensitive while building coherent neighborhoods combining large modern homes and community amenities.

The environmental work of Luna Leopold (1915-2006), famed American geologist and hydrologist, influenced the management of Watts Branch Stream Valley Park. Leopold's groundbreaking 40-year study of Watts Branch revealed the effects of suburbanization on the environment.

These residential developments were accompanied by an increasing need for schools, churches, shopping centers, office buildings, libraries, medical, health care, and recreation facilities. Virtually every aspect of life in suburbia – shopping, employment, education, recreation, religious worship – was geared to “Car Culture” and was designed to accommodate the family car and suburban mobility made possible by transportation infrastructure.

The John Henry O’Neale House is indeed one of the few extant dwellings representing the early twentieth century agricultural history of Montgomery County that preceded the mid-20th century population explosion. The absence of farm-related outbuildings and fields is reflective of the late 20th century development that encroached upon the property, representing the suburban transformation of the area.

Research Library & Other Resources

Peerless Rockville, a non-profit historic preservation advocacy organization, possesses a research library that contains information on the history of many of these modern properties. We invite you to visit us to learn more about many of the communities.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Pickard". The ink is dark and the signature is fluid, with a large loop on the 'P' and a trailing flourish at the end.

Nancy Pickard

Executive Director

SAVE OUR
SEMINARY



AT FOREST GLEN

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Eugene Rich, Vice President
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Frank Riley, Secretary
Cassandra Ashman
Toni Bailey
Anne Brockett
Pat Crawford
Ann Hall
Patti Horrall
Linda Lyons
Chris Maines

Executive Director
Bonnie Rosenthal

June 11, 2019

The Honorable Pete K. Rahn, Secretary
Maryland Department of Transportation
State Highway Administration
I-495 & I-270 P3 Office
707 North Calvert Street
Mail Stop P-601
Baltimore, MD 21202

Re: I-495 and I-270 P3 Program

Dear Mr. Rahn:

We are writing to express our position on the I-495 and I-270 P3 Program, especially the seven currently recommended Alternatives Retained for Detailed Study (ARDS).

Many of the proposed I-495 expansion routes would harm a woodland area with a tributary of Rock Creek flowing through it. This area, known as "the Glen," is deemed a critical natural resource by the Maryland-National Capital Park and Planning Commission and is protected by a Category I Conservation Easement that prohibits altering the natural landscape.

The Glen borders the southern edge (the "inner loop") of I-495 for over 800 linear feet. Close to that edge are historic and possibly archaeological features that include a bridge abutment and stone retaining wall that were once part of the network of paths, bridges, and trails used by students of the former National Park Seminary (NPS) in Silver Spring, Maryland. We are concerned that expansion of the highway likely will adversely affect these features as well as the landscape into which they were deliberately designed, and which currently provides green space to both residents and the public.

NPS, once an elite girls' school (from the late 1800s until the 1940s), was transferred to the United States Army for a military convalescence hospital in 1942. Today, the historic campus is a residential community providing single- and multi-family housing for all income levels and includes the offices of a charitable organization supporting homeless adults. NPS is designated as a Historic District in the National Register of Historic Places and is listed on the Maryland Inventory of Historic Properties. The Maryland Historic Trust finds NPS's historic assets so valuable and significant that it has placed the property within a Preservation Easement.

Our organization, Save Our Seminary (SOS), knows this landscape well. SOS is a nonprofit organization incorporated in 1989 to combat the neglect of the unique and historic buildings and landscape of NPS. SOS's ongoing mission is to communicate the history of the National Park Seminary and promote preservation of its buildings, artifacts, and landscape.

At this time, we do not know where the proposed expansion, if it occurs, will be located, but NPS's location makes it highly vulnerable. We ask that the MDOT take the time to study fully the potential effects of this action and explore every feasible avenue other than road expansion into this historic greenspace. We strongly urge you to avoid claiming historic and natural features to reduce traffic congestion.

Sincerely,

Bonnie Rosenthal
Executive Director



CARDEROCK SPRINGS

National Register of Historic Places

June 12, 2019

Governor Larry Hogan
100 State Circle
Annapolis, Maryland 21401-1925

Administrator Gregory Slater
Maryland State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202-36-01

Subject: Comments about alternatives retained for detailed study & concerns about planned Beltway expansion

I am the President of Carderock Springs Citizens' Association (CSCA) and write on behalf of the Carderock Springs community, a historic community located adjacent to the west side of Interstate 495 (the Beltway) and Carderock Springs South, a community located adjacent to the east side of the Beltway.

Our community was very disappointed to learn at the SHA public workshop on April 13, 2019 that despite our previous comments submitted to SHA on April 30, 2018 and October 1, 2018, SHA selected Alternatives that would add two lanes in each direction. As we have previously stated, adding 2 lanes in each direction would reduce the distance between the lanes of the Beltway where vehicles will travel and school and residences, resulting in increased noise and dangerous air pollution. That means, contrary to Governor Hogan's earlier promises to keep the Beltway expansion within the right-of-way (ROW), our community was shocked to learn on April 13 that:

1. Many homeowners might be losing parts of their yards (at least temporarily) should the alternatives that will be adding two lanes each direction be chosen. As previously noted in our comments, Carderock Springs has been designated a National Historic District that is listed in the National Register of Historic Places. A greater level of analysis and limitations on decision-making under Section 106 of the National Historic Preservation Act and Section 4 (f) of the Department of Transportation Act is warranted. Taking away these properties is not acceptable.
2. Traffic will be much closer to the Carderock Springs Elementary School (CSES), with a large area of the school and field exposed to noise of more than 66 dB and harmful pollution. In addition to previously cited research confirming the harmful effect of highway pollution on children's lung development, we also note that CSES has three classrooms for children with autism. Children on the autism spectrum are extremely sensitive to noise and we believe that their needs should be part of the on-going analysis of the ARDS and possible remediation if I-495 is expanded. Thus, not only will the effects of a beltway expansion be felt within a

Carderock Springs Citizens' Association
P.O. Box 237, Cabin John, MD 20818-0237

www.carderocksprings.net

sensitive population, but such effects will be felt by a sensitive population *within a sensitive population*. Action must be taken to mitigate noise impacts at this location.

3. Elevated ramps over the Beltway linking managed lanes and River Road are also included as part of the ARDS, which will expand significantly the area negatively affected by noise and air pollution. Placing such elevated ramps in a residential area is, to our knowledge, an approach that has been rejected in all other jurisdictions as its negative effect is multiplied.

While our concerns are closely linked to the adverse effects that expanding the Beltway would have on our community, we share the views expressed by Montgomery County and others requesting the environmental, fiscal, and traffic impacts of proposed plans. Alternatives 8, 9, 10, 13B and 13C will, according to the very preliminary analysis provided in the Managed Lanes Study, have unacceptable impacts. We request that SHA assesses more carefully and comprehensively traffic patterns than it has up to now as it plans road expansion.

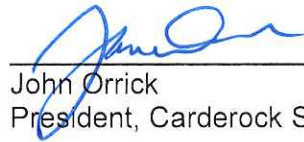
CSCA therefore requests that the SHA's environmental review and EIS specifically include the following:

- Conduct a new noise impact study to serve as the current baseline to measure the current level of Beltway noise in the vicinity of Carderock Springs given increased traffic over the last 17 years. If this study shows that current noise levels require a noise wall as abatement, any project alternative selected, even if limited only to traffic control measures, should include the building of a noise wall to specifications designed to ensure significant noise reduction.
- The traffic data used for the noise study to project future conditions should be conservative and be based on worst-case-scenarios in order to obtain true and correct traffic projections, both to determine the need for managed lanes, and to project actual traffic noise and emissions.
- In conducting the air pollution impact study to measure the current and projected levels of Beltway air pollutants in the vicinity of Carderock Springs, the health impacts of those current levels of pollutants, and the need for mitigation, the study must recognize and take into account the proximity of CSES and its athletic fields to the Beltway, and the potential for traffic to be even closer to these sensitive receptors if the ROW is expanded or if travel lanes are brought closer to the outside boundaries of the existing ROW.
- Evaluation of eligibility of Carderock Springs for Type I abatement under both existing conditions and future conditions.
- Include as a component of the alternatives (not as potential mitigation) a solid noise barrier along both sides of the Beltway in the vicinity of Carderock Springs
- Establish an I-495 & I-270 Community Working Group for community members, including Carderock Springs representation to actively participate in the development of the Draft Environmental Impact on I-495 & I-270 Managed Lanes Study and in any Section 106 Programmatic Agreement or

Governor Larry Hogan
Administrator Gregory Slater
June 12, 2019
Page 3

Memorandum of Agreement, so the input and comments of these important stakeholders can shape SHA's further planning, review, design, and mitigation, rather than having these uniquely-situated stakeholders being relegated to participating only in the post-Draft Environmental Impact Statement public comment period.

We trust that you will seriously consider these comments.



John Orrick
President, Carderock Springs Citizens' Association

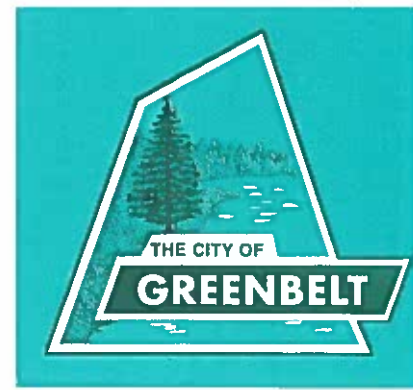
cc: Marc Korman, Delegate, District 16
Sara Love, Delegate, District 16
Susan Lee, Senator, District 16
Andrew Friedson, Councilmember, Montgomery County
Jack R. Smith, Superintendent, Montgomery County Public Schools

Carderock Springs Citizens' Association
P.O. Box 237, Cabin John, MD 20818-0237
www.carderocksprings.net

CITY OF GREENBELT, MARYLAND

DEPARTMENT OF PLANNING & COMMUNITY DEVELOPMENT

15 CRESCENT ROAD, SUITE 200, GREENBELT, MARYLAND 20770-1897



June 26, 2019

Steve Archer
Cultural Resources Team Leader
Maryland Department of Transportation State Highway Administration
Environmental Planning Division
707 North Calvert Street
Baltimore, MD 21202

RE: Preliminary List of Adversely and Potentially Adversely Affected Historic Properties

Dear Mr. Archer:

The City of Greenbelt has reviewed the preliminary list of adversely and potentially adversely affected historic properties as of June 17, 2019 and the City is concerned about the omission of certain properties from the list. The widening of the Capital Beltway (I-495) will have an impact on natural, socioeconomic, cultural, and built environment which would include Historic Greenbelt and its significant historical resources. These are resources that have significant value to the history and character of Greenbelt, as well as the State, and must be protected, as mandated by Federal law.

The City requests the following be added on the list:

- The Greenbelt Historic District, designated a National Historic Landmark (NHL) in 1997, whose boundaries encompass 756.8 acres in four discontiguous parcels. There are a large number of contributing resources which should be considered including the following ones.
 - The Turner Family Cemetery (now the Greenbelt City Cemetery) identified in 1937 government plans as the community's cemetery.
 - The Walker Family Cemetery/Indian Springs Park, a 1.3 acre site of springs, forest, and a burial ground is which was retained as an historical/recreational point of interest for the original community residents. This is a contributing resource.

In addition, the highway widening plans would include the Baltimore Washington Parkway, a scenic highway that was constructed to improve connectivity between Baltimore and

A NATIONAL HISTORIC LANDMARK

PHONE: (301) 345-5417 FAX: (301) 345-5418 TDD: (301) 474-2046

www.greenbeltmd.gov



Washington DC, first envisioned by Pierre L'Enfant in his original plan for the United States Capital in 1791. The widening runs counter to the protection of the Parkway's aesthetic underpinnings.

The City continues to strongly oppose the proposed widening of the Capital Beltway to accommodate managed and/or toll lanes. The City is not in favor of alternatives that would require widening and believes that the project should limit its consideration to the alternatives that seek to manage transportation capacity and demand using only the existing paved right-of-way. In addition, the City advocates for study and identification of alternatives for congestion relief and dedication of more funding to transit.

The City is also concerned that this project will lead to more vehicles on the road, more congestion, more greenhouse gas emissions and air pollution – impacts that are not included in the screening criteria.

Thank you for the opportunity to comment. If you have any questions please contact Terri Hruby, Planning Director at 301-345-5417.

Sincerely,



Terry S. Hruby

cc: City Council
Nicole Ard, City Manager

From: Ballo, Rebecca <rebeccah.ballo@montgomeryplanning.org>

Sent: Wednesday, July 3, 2019 3:47 PM

To: Steve Archer <SArcher@mdot.maryland.gov>

Cc: Jeanette Mar, FHWA <jeanette.mar@dot.gov>; Beth Cole, MHT <beth.cole@maryland.gov>; Tim Tamburrino, MHT <tim.tamburrino@maryland.gov>; Caryn Brookman <CBrookman@mdot.maryland.gov>; Matt Manning <MManning@mdot.maryland.gov>; Lampl, Joey <joey.lampl@montgomeryparks.org>; Rubin, Carol <carol.rubin@montgomeryplanning.org>; Crane, Brian <Brian.Crane@montgomeryplanning.org>; Liebertz, John <John.Liebertz@montgomeryplanning.org>

Subject: RE: I-495/I-270 MLS Section 106 DOE forms, Batch 8, Consulting Party Meeting reminder 6/17 1pm

Good afternoon Steve,

The following are the compiled comments from Montgomery County Park & Planning on the Batch 8 DOEs. We have also included preliminary comments on other items.

- The Batch 8 Determinations of Eligibility included reference to Maryland Historical Trust Site M: 26-6, The Poor Farm, site and Cemetery. The corresponding mapped location for this resource in the Maryland Historical Trust archaeological site files (Site 18MO33) and in the Montgomery County Burial Sites Inventory is on the opposite side of I 270, on the north side of Wootton Parkway nearly half a mile away from the location investigated for Batch 8. Archaeological investigations for the Managed Lanes project must include the location and surroundings of Site 18MO33.
- Montgomery Parks concurs that Cabin John Regional Park is not eligible for the National Register of Historic Places *based on the current Determination of Eligibility (DOE) form*. Montgomery Parks concurs that Argyle Local Park is not eligible for the National Register of Historic Places *based on the current DOE form*. Montgomery Parks concurs that North Chevy Chase Local Park is not eligible for the National Register of Historic Places *based on the current DOE form*.

We do want to note that in the absence of any thorough archaeological information and technical reports, these concurring statements are premature and preclude us from making a truly informed decision on these DOEs or the project as a whole. Should archaeological features or sites be found in any of the above sites or in those released in previous batches, our response would change.

We continue to await technical reports, an expanded Area of Potential Effect (APE) map for Alternative 10, and the Determination of Effect (DOE) forms that would result.

Our response to the items distributed for review at the June 17, 2019 Section 106 Consulting Parties meeting (e.g., the List of Adverse Effects, the Draft Programmatic Agreement) and to other big-picture questions or discussion items are predicated on receiving the forthcoming technical reports and above items and to be given the time and tools to appropriately review a significant amount of new information. In addition, we point out that SHA's objection to supplying the M-NCPPC with GIS shape files for the project seriously undermines our ability to accurately correlate and respond to the impact of the project.

We look forward in the future to putting forth a formal recommendation that seeks an evaluation of the M-NCPPC's stream valley park system *as a whole* starting with formation and up to its mature years (before the M-NCPPC ventured into the establishment of regional parks). Montgomery County Parks and Planning recommend taking a holistic approach to determining the eligibility of the stream valley parks under Criterion A across both Montgomery and Prince George's Counties instead of reviewing the individual stream valley parks (or sections of the parks) as distinct entities. We believe that under Criterion A, there should be a way to take an *integrated* look at the regional and environmental planning import of this stream valley park system across the entirety of the M-NCPPC. Should we put forth this recommendation formally, and should it lead to a National Register Determination of Eligibility under Criterion A, the Department of Parks for both Montgomery and Prince George's Counties will require a signed Programmatic Agreement among the M-NCPPC, NCPC, and MHT to allow the land-owning Agencies to be able to continue to operate the stream valley park system as we do now, for the benefit of the residents of both counties, and without any undue regulatory hardship.

Lastly, at our June 17th meeting your team had offered to work with us to hold separate coordination meetings in addition to the larger CP meetings. We will work within our agency to identify some dates and communicate those with you soon. Thank you for the opportunity to comment.

Sincerely,



Rebecca Ballo
Historic Preservation Program Supervisor | Montgomery County Planning Department
8787 Georgia Avenue | Silver Spring, Maryland 20910
Tel: 301-563-3404; Email: Rebecca.Ballo@montgomeryplanning.org



Ms. Joey Lampl
Cultural Resources Manager
The Maryland-National Capital Park and Planning Commission
9500 Brunett Avenue
Silver Spring, MD 20901
301-563-3414

From: Lampl, Joey <joey.lampl@montgomeryparks.org>
Sent: Thursday, August 1, 2019 4:18 PM
To: Steve Archer <SArcher@mdot.maryland.gov>
Cc: Ballo, Rebecca <rebecca.ballo@montgomeryplanning.org>; Mueller, Julie <julie.mueller@montgomeryparks.org>; Michaud, Cassandra <cassandra.michaud@montgomeryparks.org>; Rubin, Carol <carol.rubin@montgomeryplanning.org>; Harper, Matthew <Matthew.Harper@montgomeryparks.org>; Stephens, Douglas <Douglas.Stephens@montgomeryparks.org>; Cole, Jai <jai.cole@montgomeryparks.org>
Subject: Batch 9 Comments ML Study M-NCPPC, Montgomery Parks

Hello Steve,

Here is the response from M-NCPPC, Montgomery Parks on Batch 9 of the Managed Lane Study:

M-NCPPC, Montgomery Parks does *not* concur with the DOE finding that Cabin John SVP is ineligible for the National Register. Parks believes Cabin John SVP is eligible under Criterion A as a natural stream valley park within the broader park system that also includes Rock Creek Park and Sligo, which have been found eligible. All are part of the same cultural landscape system that M-NCPPC created to preserve the watersheds of the Anacostia and the Potomac. Even though Cabin John SVP was implemented later than Rock Creek or Sligo, its implementation in the early 1960s would simply mean that a period of significance might range from ca. 1929 to the early 1960s.

As I have mentioned in the past, these comments do not include anything we might add on the impact to archaeological resources as we would need to review the full archaeological technical report.

In addition, as you have asked for the identification of additional consulting parties, please remind me if the National Capital Planning Commission is a consulting party. As you know, many of the units in M-NCPPC's stream valley park system were purchased with Capper-Crampton funds that tie our history and ongoing park use to NCPC involvement.

Sincerely,
Joey

Ms. Joey Lampl
Cultural Resources Manager
The Maryland-National Capital Park and Planning Commission
9500 Brunett Avenue
Silver Spring, MD 20901
301-563-3414

From: Stabler, Jennifer <Jennifer.Stabler@ppd.mncppc.org>
Sent: Friday, August 2, 2019 2:40 PM
To: Steve Archer <SArcher@mdot.maryland.gov>
Subject: RE: I-495/I-270 MLS Section 106 DOE forms, Batch 9

Hi Steve,

The Prince George's County Historic Preservation Section has reviewed the Batch 9 DOE forms and we concur with the eligibility evaluations recommendations provided.

Please let me know if you have any questions or need any additional information.

Thanks,

Jennifer

Jennifer Stabler, Ph.D.
Archeology Planner Coordinator
Historic Preservation Section
The Maryland-National Capital Park & Planning Commission
14741 Governor Oden Bowie Drive
Upper Marlboro, MD 20772
301-952-5595 (Voice)
301-952-3799 (Fax)



CARDEROCK SPRINGS
National Register of Historic Places

October 9, 2019

Lisa B. Choplin
Maryland State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202-36-01

Subject: Carderock point-of-contact for the Section 106 process, Draft EIS

Dear Mrs. Choplin,

Thank you for your response of July 10, 2019 to our June 12, 2019 comment letter regarding the proposed Beltway widening project. There were some points raised in your letter that I wanted to respond to.

Our historic community as well as the children that attend the Carderock Springs Elementary School face significant community integrity, quality of life and learning impacts from the Beltway expansion. As our comment letter stated, adding 2 lanes in each direction would reduce the distance between the lanes of the Beltway where vehicles will travel and school and residences, resulting in an increased noise and dangerous air pollution. This approach wouldn't be compatible with our designation as a National Historic District and with a learning environment for the children in our community and elementary school that includes students with autism.

Given our National Historic Designation, our community looks forward to participating and providing its input during the Section 106 process. John Tiernan (jtier@verizon.net) will be representing Carderock in this process. Konstantin Gartvig (kgartvig@yahoo.com) and Elena Kazakova (elenawiz@gmail.com) will be alternates.

Our community is strongly interested in SHA's evaluation of noise mitigation through sound barriers construction and how these can address our concerns on sound and air quality impacts. Once this analysis is completed, we would like to invite SHA representatives to come to our community to discuss the findings.

Also, if public reviews of the Draft EIS are still planned for December 2019, our community would like to participate in the public hearings on the Draft EIS. Please alert us when these are to take a place so we can organize a community meeting to discuss these findings directly with our residents. We hope that our community concerns will be heard and addressed in the Draft EIS.

Thank you for your attention to this matter.



John Orrick
President, Carderock Springs Citizens Association

cc: The Honorable Andrew Friedson, Councilmember, Montgomery County Council
The Honorable Marc Korman, Maryland House of Delegates
The Honorable Susan C. Lee, Senate of Maryland
The Honorable Sara Love, Maryland House of Delegates
Mr. Jack R. Smith, Superintendent, Montgomery County Public Schools
Mr. Jeffrey T. Folden, P.E., DBIA, Deputy Director, I-495 and I-270 P3 Office, SHA
Mr. Gregory Slater, Administrator, MDOT SHA
John Tierman
Konstantin Gartvig
Elena Kazakova

From: Josh Tulkin <josh.tulkin@mdsierra.org>
Sent: Friday, October 25, 2019 5:37 PM
To: Steve Archer <SArcher@mdot.maryland.gov>
Subject: Response to request for consulting party status

Oct 25, 2019

To Steve Archer
Cultural Resources Team Leader
Maryland Department of Transportation State Highway Administration
Environmental Planning Division
707 North Calvert Street
Baltimore, MD 21202
Phone 410-545-8508
sarcher@mdot.maryland.gov

Re: Request for consulting party status on section 106 review of RCSVP Units #2,3

Dear Mr. Archer,

The Sierra Club is deeply concerned about proposed impact of the proposed expansion of highways 495 and 270 in Maryland, also known as the "Manager Lanes Project" and its potential effects on historic properties.

We understand that consultation has been initiated under Section 106 of the National Historic Preservation Act (NHPA) for the Manager Lanes Project, and that compliance with Section 4(f) of the Department of Transportation Act will/may also be required. Sierra Club would like to participate actively in the review process, both as a "consulting party" under Section 106 of the NHPA, pursuant to 36 C.F.R. § 800.2(c)(5), and by receiving and commenting on any documents prepared pursuant to Section 4(f).

Sierra Club's membership mission is to enjoy, explore, and protect the planet. Our outdoor programs bring people to hikes and outings across the country, from local parks, to areas of environmental and cultural significance. The Sierra Club has routinely over the years sought to protect areas for both their natural resource values and their cultural values.

For example, we recently supported national monument status for Stonewall Inn and the Cesar Chavez homestead. We just commissioned a study of the history of the John Muir Trail and its construction. Links to our press releases on several of these issues is below. Locally Sierra Club was a vocal advocate for the creation of the Harriet Tubman Underground Railroad National Historic Park and Trail.

Locally, Sierra Club has thousands of members who live around the proposed route, and our members utilize the Rock Creek Stream Valley Park and other local parks that would be impacted by the project. We are concerned about the potential impact on Rock Creek Stream Valley Park for both its ecological resources and cultural value. The creation and preservation of Rock Creek Stream Valley park was a key factor in the establishment of new institutions, such as the Maryland-National Capital Parks and Planning Commission, the establishment of the park marks a critical milestone in the land preservation movement of the time.

Because of Sierra Club's knowledge and concern about historic properties potentially affected by the project, we believe we can provide important information and a valuable perspective as a consulting party under Section 106 and in the review process under Section 4(f).

Please include Sierra Club in your distribution list for public notices of any meetings, and for the circulation of documents for comment.

We look forward to participating as the review and consultation process moves forward for the Manager Lanes process.

Sincerely,
Joshua Tulkin
Maryland Chapter Director

Links:

- Statement on creation of Stonewall National Monument
<https://content.sierraclub.org/press-releases/2016/06/sierra-club-praises-stonewall-national-monument>
- Statement on creation of Birmingham Civil Rights National Monuments: <https://www.sierraclub.org/press-releases/2017/09/sierra-club-applauds-new-national-monuments-commitments-increase-diversity>
- Blog on Pullman Historic Site: <https://blogs.sierraclub.org/layoftheland/2014/09/labor-day-2014-preserving-labors-pullman-legacy.html#more>
- Statement on [César E. Chávez National Monument](#).: <https://blogs.sierraclub.org/layoftheland/2012/10/monument-to-a-national-treasure.html>



Chesapeake & Ohio Canal Association Inc.

A citizens' association concerned with the conservation of the natural and historical environment of the C&O Canal and the Potomac River Basin

P.O. Box 366
Glen Echo, Maryland 20812
December 24, 2019

Mr. Steve Archer
Cultural Resources Team Leader
Maryland Department of Transportation
State Highway Administration
Environmental Planning Division
707 North Calvert Street
Baltimore, Maryland 21202

Dear Mr. Archer:

Thank you for including the Chesapeake & Ohio Canal Association as a consulting party in the planning for proposed changes to I-495 and I-270.

As you know, the project's Area of Potential Effects includes National Parks on both sides of the Potomac River. As our name implies, however, our primary mission is to protect the C&O Canal National Historical Park. Our attention therefore focuses on the American Legion Memorial Bridge and its approaches in Maryland. We foresee potential harm to the natural and historical values of the canal park if the project proceeds.

During the construction phase, there would be inevitable disturbance to the Park's viewsheds, tranquility, wetlands, and perhaps to its structures. We are concerned that such disturbances would be kept to a minimum if the project moves forward. During the initial construction of the Capital Beltway in the 1960s, canal Lockhouse #13, a fine stone structure dating to 1830, was razed. We and the public are even more sensitive to historical concerns today. It is our hope that complete restoration would follow any damage to structures or to the wetlands in the Potomac Valley, and that the Park would be left in at least as fine a state as before the project began.

We note in particular that preliminary plans include space for pedestrians on the new bridge. We do not see how this would connect to the neighborhoods and to the parks at either end of the bridge. It would certainly be easier to connect with the C&O Canal on the Maryland end of the bridge than to the Potomac Heritage Trail, given the difference in the vertical distances to the ground on the two ends. We look forward to seeing how park visitors might take advantage of new access points.

We also have concerns for buried resources, such as the all-too-fragile Potomac Interceptor sewage line, and hope that damage to such assets will be avoided.

The C&O Canal Association is an all-volunteer citizen organization established in 1954 to help conserve the natural and historical environment of the C&O Canal and the Potomac River Basin. The Association thanks the Maryland Department of Transportation for the opportunity to comment on this project and looks forward to an outcome that is historically, culturally, and ecologically appropriate.

Yours truly,



William R. Holdsworth
President

**I-495 & I-270 Managed Lanes Study
Section 106 Consulting Parties List**

Federally Recognized Tribes

- Absentee-Shawnee Tribe of Oklahoma
- Delaware Nation
- Delaware Tribe of Indians
- Chickahominy Indian Tribe
- Chickahominy Indians Eastern Division
- Eastern Shawnee Tribe of Oklahoma
- Monacan Indian Nation
- Nansemond Indian Tribe
- Oneida Indian Nation
- Onondaga Nation
- Pamunkey Indian Tribe
- Rappahannock Tribe, Inc.
- Saint Regis Mohawk Tribe
- Seneca-Cayuga Nation
- Shawnee Tribe
- Tuscarora Nation
- Upper Mattaponi Indian Tribe

State Recognized and Other Tribes

- Piscataway Conoy Tribe of Maryland (PCT)
- PCT - Cedarville Band of Piscataway
- PCT - Choptico Band of Piscataway
- Piscataway Indian Nation

Federal Agencies

- Department of Defense
- General Services Administration
- Federal Railroad Administration
- Federal Transit Administration
- National Capital Planning Commission
- National Institute of Standards and Technology
- National Park Service
- U.S. Army Corps of Engineers
- U.S. Department of Agriculture
- U.S. Postal Service

State Agencies and Organizations

- Maryland Commission on Indian Affairs
- MDOT Maryland Transit Administration
- MDOT Maryland Transportation Authority
- Maryland Historical Trust
- Preservation Maryland
- Virginia Department of Historic Resources
- Virginia Department of Transportation
- Washington Metropolitan Area Transit Authority

**I-495 & I-270 Managed Lanes Study
Section 106 Consulting Parties List**

County Agencies and Organizations

- Maryland Milestones/Anacostia Trails Heritage Area, Inc.
- Montgomery County Department of Correction and Rehabilitation
- Montgomery County Department of General Services
- Montgomery County Department of Transportation
- Montgomery County Heritage Area, Heritage Tourism Alliance of Montgomery County
- Maryland-National Capital Parks and Planning Commission – Montgomery County Planning – Historic Preservation
- Maryland-National Capital Parks and Planning Commission – Montgomery Parks
- Maryland-National Capital Parks and Planning Commission – Prince George's County Planning – Historic Preservation
- Maryland-National Capital Parks and Planning Commission – Prince George's County Department of Parks and Recreation
- Montgomery Preservation, Inc.
- Prince George's County Historic Preservation Commission
- Prince George's County Historical and Cultural Trust
- Prince George's Heritage, Inc.

Municipal Agencies and Organizations

- C&O Canal Association
- C&O Canal Trust
- Carderock Springs Citizens' Association
- City of College Park
- City of Glenarden
- City of Greenbelt
- City of Rockville
- Gibson Grove A.M.E. Zion Church
- Peerless Rockville
- Save Our Seminary at Forest Glen
- Sierra Club Maryland Chapter
- Village of North Chevy Chase

DRAFT – Pre-Decisional
CONCEPTUAL DISCUSSION OUTLINE
PROGRAMMATIC AGREEMENT

Among the
FEDERAL HIGHWAY ADMINISTRATION,
MARYLAND DEPARTMENT OF TRANSPORTATION STATE HIGHWAY
ADMINISTRATION,
MARYLAND STATE HISTORIC PRESERVATION OFFICER,
VIRGINIA STATE HISTORIC PRESERVATION OFFICER,
ADVISORY COUNCIL ON HISTORIC PRESERVATION

Implementing Section 106 of the National Historic Preservation Act for the
I-495 and I-270 Managed Lanes Study
Montgomery and Prince Georges Counties, Maryland and Fairfax County, Virginia

Recitals (Whereas Clauses)

This section will define the background of the project (“Undertaking”), and the intention of this agreement, including (but not limited to):

- Defining the Undertaking (the specific federal actions that may affect historic properties)
- FHWA is the lead federal agency, as designated by other agencies; execution of this agreement fulfills 106 responsibilities for the other federal agencies, etc.
- Involvement of Other Federal Agencies
- Defining the Public-Private Partnership (P3), and that the concessionaire will advance design under approval by the state.
- Review of completed steps in Section 106 process (consultation, APE, identification of properties, assessment of effect, etc.)
- Stating that historic properties will be adversely affected by the undertaking, however all effects to historic properties cannot be fully determined
- That the signatories, having involved consulting parties, have agreed that the PA and implementation of its terms of fulfill the requirements of Section 106 for the undertaking

Stipulations

1. Roles and Responsibilities

- a. **FHWA** (will describe that FHWA, as designated lead federal agency, is ultimately responsible for ensuring the terms of this agreement are carried out)
 - b. **MDOT SHA** (Will describe that MDOT SHA will be responsible for implementation of stipulations of the agreement)
 - i. Concessionaire (because the Concessionaire is not selected at this time, stipulation will describe what requirements MDOT SHA will place on concessionaire through the procurement process)
 - ii. Will Retain qualified CR staff responsible for fulfilling their commitments
 - c. **Other Federal Agencies** (to be determined related to level of involvement with adversely affected historic properties and mitigation implementation)
 - d. **SHPOs** (will describe jurisdiction [Maryland, Virginia] and elements such as concurrence/comment decision points and anticipated review timelines)
 - e. **ACHP** (will describe ACHP's role as providing policy guidance and dispute resolution/comment)
 - f. **Concurring Parties/Public** (consulting parties invited to concur in the agreement may have ongoing opportunities to provide input, participate in mitigation projects, etc.; will describe mechanisms for how the general public not identified as consulting parties may engage in the future and addition of consulting/concurring parties in the future)
2. **Professional Standards** (will reference applicable Secretary of Interior qualifications, SHPO, National Register, ACHP and other applicable standards for evaluation and reporting for cultural resources studies)
3. **Project-wide Mitigation and Commitments** (may describe mitigation that addresses multiple properties, or logical groupings of affected properties, general provisions for avoidance through design refinements, context-sensitive solutions, etc.) MDOT SHA is seeking consulting party input on these measures.
4. **Property-Specific Mitigation and Commitments**
MDOT SHA is seeking input on potential mitigation for the properties currently identified as experiencing an adverse effect. This section will break out mitigation or other commitments specific to each property (see the preliminary list attached to this document)
5. **Archaeological Treatment Plan**
- a. MDOT SHA will develop an archaeological treatment plan in consultation with relevant parties that identifies:
 - i. Areas presently inaccessible for study to be evaluated
 - ii. Treatment of determined/assumed eligible sites
 - iii. Known sites requiring further evaluation for NRHP eligibility (Phase II)

- iv. Monitoring Requirements
- v. Treatment of Cemeteries
- vi. Standardized evaluation and treatment process for newly-identified project elements, process (including consultation with relevant parties) for updates and revisions to treatment plan.

(MDOT SHA's goal is to have a comprehensive but flexible archaeological treatment plan that addresses the current LOD but can be revised and updated in response to project advancement)

6. Architectural Resources

- a. Will describe evaluation of inaccessible/unevaluated properties (MDOT SHA has to date not been granted access to the Martin-Marietta Headquarters, but anticipates evaluation of all other architectural resources identified in the Gap Analysis prior to PA completion)
- b. Will describe process for effects assessment to identified historic properties currently with "unknown" effects upon further design, or should design within the APE evolve to change effect determinations.

7. Revisions to APE in response to Design Advancement

- a. Will describe the process to revise the APE for minor changes with no potential to change or cause new effects to historic properties
- b. Will describe the consultation process on substantial APE revisions where historic properties may be additionally or differently affected.
- c. Will describe the evaluation and treatment of additional architectural resources in response to APE expansion.

8. Continued Consultation

In addition to the above, there may be ongoing consultation required for properties where effects cannot yet be fully determined, design of certain elements in proximity to historic properties (such as elevated structures), where consultation may be requested to achieve context-sensitive design and minimize effects. MDOT SHA is seeking input on those project elements where further consultation is requested and appropriate.

9. Inadvertent Discovery (Including Human Remains)

MDOT SHA has a standard procedure for all projects in the event of inadvertent discovery of human remains or archaeological resources, or inadvertent adverse effects to previously identified historic properties, that will be encapsulated here.

10. Monitoring of Performance

This section will describe how the parties will understand progress on implementation of commitments and mitigation, through regularly issued summary reports (such as annual or quarterly) and/or regularly scheduled meetings for consulting parties. MDOT SHA is seeking input on consulting party preferences for this stipulation.

11. Amendment

Will describe a standard process including consultation when amendments to the agreement are needed.

12. Dispute Resolution

Will describe a standard process for resolving objections and disputes among the parties, referencing the Amendment process if the agreement needs to be altered.

13. Termination

Will describe a standard process for termination of the agreement, and subsequent steps if termination occurs. Typically this involves a “waiting period” of consultation prior to termination, and a requirement to either negotiate a new agreement, follow the standard Section 106 process, and/or take Advisory Council comments into consideration prior to FHWA determining next steps.

14. Duration

Because of the anticipated duration of this project, and that there may be additional elements that continue, a 15 year duration may be appropriate, or until all terms of the agreement are fulfilled or the project becomes inactive; can include provisions for extension of the agreement.

Signature Pages

Signatory Parties: FHWA, MDOT SHA ACHP, MD SHPO, VA SHPO, Other Federal Agencies to Be Determined

Concurring Parties: To Be Determined