



7005

Montgomery County Government

July 18, 1997

Mr. Louis H. Ege, Jr., Deputy Director
Office of Planning and Preliminary Engineering
State Highway Administration
707 North Calvert Street, Mail Stop C-301
Baltimore, MD 21202

Dear Mr. Ege,

The Montgomery County Historic Preservation Commission has a number of concerns, both philosophical and specific, regarding the four "build" alternative routes being proposed for the InterCounty Connector (ICC). We also have a number of comments regarding the Draft Environmental Impact Statement/Major Investment Study (DEIS).

Montgomery County, until after World War II and well into the last twenty-five years, has been, for the most part, an agricultural area. The setting for substantially all of our historic resources north of the streetcar suburbs around Washington is farmland punctuated by farmsteads and crossroad towns. The historic property boundaries and migratory trails are the basis for most of the road alignments in the area. Although much of the land in the eastern county between Route 495 and Maryland 198 is now being developed as suburban housing served by new commercial centers, there remain large areas of undeveloped woods and rolling fields in the northeast quadrant of the county. The historic continuity of this area, and with it the quality of life that the citizens of the county value, will be irretrievably lost with the changes to the historic roadways in the area and, more importantly, with the increased noise levels, added impervious surfaces and unsightly visual impact of a large highway through this region.

Our specific comments on the DEIS are as follows:

1. All four of the "build" alternatives will negatively impact both standing and archaeological historic sites. The Historic Preservation Commission would strongly encourage the avoidance of the sites that are indicated for displacement or serious right-of-way incursion. These are specifically:

UERA:	Cashell Tenant Houses and Edgewood II;
MM198:	Edgewood II, Holland Store and Residence, Willow Grove, and Columbia Primitive Baptist Church;

Historic Preservation Commission

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Northern Alignment: Edgewood II, Holland Store and Residence, and Willow Grove;
All four alternatives: The displacement of prehistoric and/or historic archaeological sites
(both potential and identified).

All the standing structures can be avoided by alignment shifts. We would ask that these invaluable historic resources that represent irreplaceable components of our county's heritage be preserved.

2. Our concerns regarding the *Master Plan Alternative* relate to the loss of both identified and potential stream valley prehistoric archaeological sites. The decision-making process must factor in the serious loss of archaeological resources along this alignment.

3. The mitigation efforts considered in the DEIS for cultural resources (both standing structures and archaeological sites) were woefully inadequate. We understand that more detailed mitigation efforts will not be investigated until an alternative has been chosen, but we are concerned that the ability to mitigate should be considered as an important variable in the evaluation process.

4. We would note that the DEIS survey of cultural resources was, for the most part, to be commended. We were concerned that three National Register Eligible properties, **Woodlawn, Holland Store and Residence, and Snowden Manor**, were omitted from the survey, but the omission was expeditiously corrected. The use of the twenty year old Gardner predictive model that uses only a 20% sampling for archaeological sites was questioned by some members of our Commission as being a minimal investigative process, but was accepted by them, 1) as being a standard survey methodology and, 2) with the understanding that field inspection of identified sites and detailed review of mitigation and avoidance recommendations would be included in the final EIS. The final EIS should also provide maps of the areas sampled for archaeological resources in support of the EIS and a discussion of the location and acreage of the sampled areas.

Our more general concerns about the construction of the InterCounty Connector, particularly the northern alignments, are as follows:

5. Upon examining the design for the proposed highway construction, the Commission is concerned that the roadways, although characterized as four or six lanes, appear to be ten or more lanes wide. Turning lanes, Busway/HOV, bus only ramps, multi-use trails, and access controls all add to the width of the various alignments.

6. The Historic Preservation Commission's greatest concern, however, is that the construction of a major highway on the southern edge of this relatively untouched open space will negatively impact the growth patterns in the northeast quadrant. The Commission's concerns are about both the deleterious effects this will have on the ecology of that area and the loss to the quality of life of the county as a whole if development is encouraged by new road construction.

7005-3

The Historic Preservation Commission understands the purpose and need for an InterCounty Connector, but asks that an InterCounty Connector not be constructed if the negative environmental, cultural, and land use impacts, both real and potential, that are delineated in or alluded to in the DEIS cannot be adequately mitigated or avoided. None of the ICC Alternatives studied in the DEIS, in the opinion of the Commission, should be considered as potential candidates for construction based on their adverse effects as described in the DEIS. The Commission encourages SHA to work with the other branches of MDOT to design a new proposal that is in keeping with the current transportation and quality of life requirements of this county.

Sincerely,



George Kousoulas
Chair

cc: The Honorable Parris Glendening
The Honorable Marilyn Praisner
The Honorable Douglas Duncan