



IN REPLY REFER TO:  
NCPC File No. 6958

**DEC 16 2010**

Ms. Diane Ratcliff  
Director  
Office of Planning  
Maryland Transit Administration  
6 Saint Paul Street, Suite 902  
Baltimore, MD 21202-1614

Dear Ms. Ratcliff:

Thank you for the opportunity to participate in the review of the Supplemental Environmental Assessment (SEA) concerning the proposed Corridor Cities Transitway (CCT) and its modifications in the vicinity of West Gaithersburg, Maryland. The SEA is being prepared, as a federal regulation requirement, in response to Federal Transit Administration specifications as well as the land use plans and policies of Montgomery County and the State of Maryland (Maryland Department of Transportation and the Maryland Transit Administration (MTA)). The MTA planning efforts on the CCT have been attempting to respond to both the general public and various government interests.

The comments that are provided below are focused to the National Capital Planning Commission's (NCPC) role as the central planning agency for the federal government in the National Capital Region and express staff's general views on adequacy of the environmental evaluation and its potential planning effects to federal interest. Staff's comments on the SEA document address four issues regarding the assessment information.

The details in the SEA regarding parkland and the Stream Valley Parks within Montgomery County at the proposed project area have been found to be adequate to establish that no NCPC jurisdictional interest exists in connection with the Capper-Cramton Act of May 29, 1930, or pertaining necessary approvals to secure final parkland revisions affected by any potential light rail (LRT) or rapid bus (BRT) transitway alignments.

Staff notes, however, the proposed LRT and BRT alternatives and their respective alignments would affect federal lands as specified by both the General Services Administration (GSA) and the National Institute of Standards and Technology (NIST) within the SEA.

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The GSA has noted, and NCPC staff concurs, that the potential impact of the CCT alignment to the U.S. Department of Energy (DOE) site in Germantown, Maryland may impact federal property. The Commission staff with this letter requests that the MTA provide a full submission to the NCPC, coordinated with the GSA and DOE, pursuant to the Commission's authority. The documentation for review consultation should include preliminary project analysis on existing or proposed project easements on the property (if any) and any construction or operational impacts the CCT project would impart to this federal facility property, including security measures for any transitway alignment through the federal property. GSA also noted that final project environmental impact statement (FEIS) should address impacts and resources on the site, stormwater management issues, access, floodplains, historic buildings, and noise impacts to the DOE property.

Regarding the NIST federal property impacts, the NCPC staff finds that NIST comments and review have highlighted issues including the amount of NIST property required for any transitway alignment, impact on access at property gates, vibration and sound, and location of the CCT station proposed at NIST. Again, NCPC further observes transitway security characteristics adjacent to NIST federal property will be paramount. NCPC staff notes none of these topics were addressed for this federal property in the SEA in response to the earlier federal comments, but will be expected by NCPC to be analyzed in the FEIS. Coordination through NIST to the NCPC must occur regarding preliminary and final project design development.

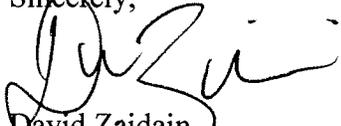
A concluding point to the NCPC review is the issue of continuity of transit usage involving other State of Maryland projects as they relate to the CCT operations at Shady Grove or other CCT connecting transit centers. Within the legally enforceable Record of Decision (ROD) on the Inter-County Connector Project (ICC), at page 9, this staff notes that the State of Maryland highlighted; "provision of express bus service has been committed to as part of the Selected Alternative. [The] SHA commits to fund capital and/or operational improvements based on the conclusions of a transit service planning study that will be initiated soon..." Furthermore, the ROD continues ... "The Selected Alternative includes a budget of \$20 million to fund this transit service planning study and the capital and operational improvements resulting from the transit study." The NCPC staff requests conclusions involving any connectivity and coordination for express bus service to and from the CCT transit center at Shady Grove, or other locations, to be discussed within the FEIS regarding ICC and CCT express bus operations, relationships, and cumulative effects.

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Your consideration of our comments at this stage of the environmental review is most appreciated. Please place the Commission on the distribution list pertaining to all further environmental considerations of the CCT project as it progresses.

Sincerely,



David Zaidain

Acting Director, Policy and Research Division

cc: Mr. Rick J. Kiegel, P.E.  
Maryland Transit Administration

Mr. Gregory Slater Director  
State Highway Administration

Mr. John Newton  
Maryland Transit Administration