



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

MEMORANDUM

September 22, 2025

TO: Artie Harris, Chair
Montgomery Planning Board

FROM: Marc Elrich, County Executive

SUBJECT: County Executive Comments regarding Clarksburg Gateway Sector Plan

Pursuant to Sec. 33A-5 of the County Code, I am submitting Executive Branch comments on the Clarksburg Sector Plan in advance of the public hearing to be held on September 25, 2025. Attached are memos I have received from the Department of Environmental Protection (DEP), Department of Permitting Services (DPS), Department of Transportation (DOT), Department of Housing and Community Affairs (DHCA), and the Montgomery County Police Department (MCPD). The departments are available to answer any questions you may have and look forward to working with you and your staff throughout the review process.

Here are my general concerns about the proposed plan, many of which are reinforced by the comments in the departmental memos.

- The boundaries of the draft plan include part of the land in the 2014 Ten Mile Creek Plan “for the purpose of reconsidering previous plan recommendations there” (page 2). **I recommend removing all recommendations that would affect that land.** The recommendations in the 2014 Plan were adopted by a previous County Council after years of careful scientific study and public debate about the importance of protecting Ten Mile Creek and the land use restrictions necessary to accomplish that. Loosening those protections in any way, under any plan, will undermine the clear intent to draw a line in the sand regarding development in this area. **The land use recommendations in the 2014 Plan were made with the expectation that future plans would respect them, and they are even more important today considering the environmental degradation that has occurred because of ongoing development in other areas of Clarksburg.**

Despite conversations with Executive departments during the development of the Public Hearing Draft, **the Plan ignores the serious consequences of adding 4,000 new housing units in an area that already has a significant shortfall in adequate public facilities.** The memo from the Department of Environmental Protection points out that proposed changes to land cover would have a major impact on the health of an already vulnerable high-quality stream system that is part of an essential water-supply network. Furthermore, the Plan's focus on rezoning employment uses for additional housing offers no guarantee that new development will meet the need for housing that is affordable to a range of income levels. And based on an analysis of four scenarios provided in Appendix K of the Plan, the Department of Transportation concludes that even with the full buildout of the BRT/Corridor Connector network, areawide connectivity and travel time will degrade significantly. Conclusion: conditions will worsen – for both current and future residents. Even the Montgomery County Police Department cautions about its potential inability to meet the service demands of the proposed population growth. It defies logic to substantially increase the population in an area with inadequate public facilities, an overtaxed transportation network, and poor access to jobs. - with no plan to address the shortfalls.

Here is a summary of comments from the Executive Departments:

- 1. The Department of Transportation concludes that the Draft's transportation recommendations will not support the recommended population growth.** To quote from their memo, "The Plan's transportation metrics (Appendix K) move notably in the wrong direction." It points out that the Plan will reduce overall job accessibility, increase travel time, and increase vehicle miles traveled (VMT) in an area of the county that already experiences "some of the longest travel times across all modes and experiences significant job and services accessibility challenges." It states that the growth proposed in the Plan "runs a high risk of not meeting Adequate Public Facilities requirements."
- 2. The memo from the police department expresses similar concerns,** pointing out that the anticipated population growth is expected to result in a higher volume of calls for service, which would likely impact response times unless there are increases in staffing levels and resource allocation., and.
- 3. According to the Department of Environmental Protection (DEP), the Draft Plan area lies almost entirely within the Little Seneca Creek watershed with a small portion in the Ten Mile Creek watershed. It also lies entirely within two Special Protection Areas. DEP points out that since 2017, the Little Seneca Creek watershed has had the greatest increase in the percentage of impervious surfaces of any watershed in the County. Additionally, while forest cover Countywide has increased, it has declined in the Plan area by several percentage points. These are red flags that should be addressed unless you are willing to accept continued degradation of the water**

supply and some of the most pristine watersheds in the County. The DEP memo emphasizes that reconsideration of elements of the Plan “presents a timely and important opportunity to reverse these trends and demonstrate how development can be aligned with ecological restoration and protection.”

Please review the memo from the Department of Permitting Services for comments on energy code compliance and the memo from the Department of Housing and Community Affairs for comments on the housing recommendations, emphasizing the importance of accommodating all income and accessibility levels. Please note that the Executive Branch does not comment on the potential impact on schools.

The departmental comments, taken together, reinforce the point that focusing solely on producing more housing ultimately does a disservice to both current and future residents. The Draft’s recommendations are inconsistent with Thrive’s vision for complete communities and 15-minute living. **Any plan for the future of Clarksburg must consider its distance from regional activity and employment centers and make recommendations that do not exacerbate existing deficiencies. It should also respect the decisions we made to protect the extraordinarily important environmental features of the area. Accordingly, the Draft Plan should be amended to address the serious concerns we have raised.**

Thank you for your consideration.

Enclosures

cc: Jeffrey Seltzer, Acting Director, Department of Environmental Protection
Chris Conklin, Director, Department of Transportation
Scott Bruton, Director, Department of Housing and Community Affairs
Rabbiah Sabbakhan, Director, Department of Permitting Services
Captain Eric M. Stancliff, Director, MCPD Policy and Planning Division
Haley Peckett, Deputy Director, Department of Transportation
Jenny Snapp, Deputy Director, Department of Housing and Community Affairs
Debbie Spielberg, Special Assistant to the County Executive
Dale Tibbitts, Special Assistant to the County Executive
Claire Iseli, Special Assistant to the County Executive
Meredith Wellington, Land Use Planning Policy Analyst to the County Executive
Kara Olsen Salazar, Planning Specialist, Department of General Services



DEPARTMENT OF ENVIRONMENTAL PROTECTION

Marc Elrich
County Executive

Jeff Seltzer
Acting Director

MEMORANDUM

September 10, 2025

TO: Kara Olsen Salazar, Planning Specialist
Department of General Services

FROM: Amy Stevens, Chief, Watershed Restoration Division *AS*
Department of Environmental Protection

SUBJECT: Clarksburg Gateway Sector Plan Amendment, Public Hearing Draft – Executive Branch Comments

As requested, the Department of Environmental Protection (DEP) has reviewed the Clarksburg Gateway Sector Plan, Public Hearing Draft. We greatly appreciate the opportunity to provide comments.

Additionally, DEP greatly appreciates the collaboration with Planning prior to the release of the public hearing draft. We would like to thank Planning for incorporating some of our comments and suggestions, particularly those relating to the alignment of Observation Drive and limiting impervious surface when compared to the previous plan. While we appreciate the opportunity to provide input during plan development, we have additional comments on the Public Hearing Draft. As noted below in our specific comments, this Sector Plan has invaluable mature and old age forest that is in jeopardy of being removed through development. Montgomery Planning and County Council has a unique opportunity to protect these vital resources by putting in place strong requirements that will prevent the removal as development concepts and plans are being reviewed and approved.

DEP is submitting the following comments and analysis:

General Comments

Land cover has a major impact on the health of streams. Imperviousness, forest cover, and tree canopy are significant cover types that influence stream health. The Clarksburg Gateway Sector Plan area lies almost entirely within the Little Seneca Creek watershed, with a small portion in the Ten Mile Creek watershed. Between 2017 and 2023 the Little Seneca creek watershed had the greatest increase in the percentage of impervious surfaces of any watershed in the County. In the Sector Plan area, the

impervious surface has already increased from 19.9% to 22.3% over that period and will increase substantially under the suggested development scenario. Additionally, between 2008 and 2023, forest cover Countywide increased, but within the Sector Plan area it declined by several percentage points. Over that same period, tree canopy remained steady across the County but declined by several percent in the Sector Plan area (Table 1).

Table 1. Clarksburg Gateway Sector Plan Land Cover Changes, 2003 to 2025

Land Cover	Percentage of	Percentage	Net Change (Result)
	Plan Area, Early 2000s	Area, 2020s of Plan	
Impervious Surface	19.9	22.3	2.4 Substantial Increase in impervious
Forest Cover	27.9	25.3	-2.6 Substantial Loss of Forest
Tree Canopy	39.3	37	-2.3 Substantial Loss of Tree Canopy

The Clarksburg Gateway Sector Plan area lies entirely within two Special Protection Areas (SPAs), with the majority located in the Clarksburg SPA. Despite this designation, it appears that the SPAs are not effectively safeguarding key land cover elements that influence stream and environmental health. As noted, all three previously discussed indicators have worsened—both from a stream health perspective and in terms of broader ecological integrity.

While some increase in impervious surfaces is expected with development, the loss of forest cover and tree canopy is not inevitable. With thoughtful planning and design, it is possible to accommodate growth while maintaining—or even increasing—these critical natural resources. It is essential that forest cover and tree canopy in the plan area do not continue to decline. In fact, they must increase to support long-term environmental resilience.

The Clarksburg Gateway Sector Plan presents a timely and important opportunity to reverse these trends and demonstrate how development can be aligned with ecological restoration and protection.

Planning must have realistic expectations for the impact of this plan on water quality in Little Seneca Creek and Little Seneca Reservoir. The increased impervious surface, reduction of tree canopy and reduction in forest cover will result in negative impacts to water quality. Research in Clarksburg has consistently shown that while stormwater management reduces the impacts, it is not sufficient to prevent degradation.

Specific Comments

- The Natural Environment, Page 7: The plan notes that “Others are identified as Targeted Ecological Areas... These areas must be carefully considered for protection and enhancement within the master planning process.” In addition to this, Maryland has also identified BioNET Areas Significant for Biodiversity Conservation and Forest Interior Dwelling Species (FIDS) habitat within the plan area. These areas warrant the same level of careful consideration for protection and enhancement.

Recent developments—such as Garnkirk Farms and Dowden’s Station—were constructed almost entirely within forested areas that were identified as “*Areas Significant for Biodiversity Conservation*” and *FIDS habitat*. These projects resulted in the loss of approximately 92 acres of forest, nearly half of which consisted of mature forests over 75 years old. To avoid similar losses and the continued decline of critical habitat, the plan should include more specific mechanisms and strategies to ensure meaningful protection and enhancement of these ecologically valuable areas.

- Section 2, B. Concept Framework Plan Figure 4: Concept Framework Plan, Page 20: Recommend identifying areas for forest protection, including forested area upstream of Shawnee Ln (which includes a Targeted Ecological Area) and upland forest area just south of COMSAT building.
- Section 3, D. Community Design, Page 62, Figure 24: It is strongly recommended that the large, forested area directly south of the COMCAST building be prioritized for preservation. This area consists primarily of mature to old age forest—over 75 years in age—which is typically of higher ecological quality. Although it is not riparian, it still provides substantial water quality and environmental benefits. Its non-riparian status may also make it more vulnerable to removal during development.

Old age forests offer unique ecological functions that younger forests cannot replicate and given the current challenges and long timelines associated with reforestation, this forest is, for all practical purposes, irreplaceable. The current design concept, which depicts the complete removal of this forest, is concerning. It would be preferable to omit a design concept altogether than to present one that suggests total deforestation.

Alternatively, revising the concept to incorporate preservation of this forest could serve as a compelling example of how development can coexist with more complex conservation goals—transforming a challenge into a central amenity and asset for the site and community.

- Section 3, E. Environment, Pages 64/65: Much of the forest in the plan area is also BioNET Areas Significant for Biodiversity Conservation and FIDS habitat.
- Section 3, E. Environment, Page 66: Recommend preserving forest areas along Coolbrook Tributary for preservation upstream of Shawnee Ln in addition to the area downstream. To maintain established forest and prevent forest cover loss it is important to protect areas outside of stream buffer widths as well as the areas within buffers.
- Section 3. E. Environment, Environment Recommendations, starting page 67. This section presents a strong set of environmental recommendations. Many align with existing requirements in the Maryland Stormwater Design Manual and other regulatory frameworks. However, several go beyond baseline standards—particularly those that include specific, measurable targets—which are likely to be the most effective in advancing environmental protection and enhancement.

For example, proposed requirements such as 50% tree canopy coverage over parking lots and 35% site green space represent meaningful strategies for mitigating environmental impacts. Given that the entire plan area lies within Special Protection Areas (SPAs) and continues to experience tree canopy and forest loss, there is a strong case for incorporating additional, more ambitious measures.

Additional recommendations to consider include:

- Requiring 50% overall tree canopy coverage per site
- Identifying and preserving key forest areas through conservation easements
- Preserving all mature forests (75+ years old) that are at least 1 acre in size, and at least 75% of mature forests that are 2 acres or larger
- Prohibiting stormwater management waivers within SPAs, consistent with the heightened environmental sensitivity of these areas

These enhancements would strengthen the plan's environmental integrity and demonstrate a proactive approach to long-term ecological resilience.

We appreciate the opportunity to comment on the Clarksburg Gateway Sector Plan, Public Hearing Draft and look forward to continuing to partner with Planning staff on future plans.

cc: Claire Iseli, CEX
Meredith Wellington, CEX
Jeff Seltzer, DEP



DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

Marc Elrich
County Executive

Scott Bruton
Director

MEMORANDUM

September 16, 2025

TO: Kara Olsen Salazar, Planning Specialist
Department of General Services

FROM: Jenny R. Snapp, Deputy Director *JRS*
Department of Housing and Community Affairs

SUBJECT: Clarksburg Gateway Sector Plan Amendment, Public Hearing Draft Comments

Please accept this Memorandum as the Department of Housing and Community Affairs (DHCA) review of the Clarksburg Gateway Sector Plan, Public Hearing Plan. Thank you for the opportunity to provide comments.

As the plan states, over 97% of the housing units in the area are built after the year 2000, and tend to be newer, larger and with a higher median sale price. Given this, consideration needs to be given to ensuring the following:

Supporting the Plan recommendations:

- Attention should be given to a diversity of housing types for a range of incomes. A majority of units in Clarksburg are admittedly Single-Family. A mix of unit types, which include work force housing, multi-family, apartments, duplexes, multiplexes, and accessory dwelling units should be added to accommodate all income and opportunity levels. This should include accessible units for the ageing and differently abled populations. Small micro units should be added as well as larger 3 bedrooms and above.
- As the plan states, supportive housing should be developed for those at risk or experiencing homelessness.
- DHCA fully supports the recommendation in the plan to increase the addition of income restricted affordable units as well as providing 15% or more total residential units set aside as MPDUs.
- Work with developers to create units that reduce energy demands for the residents/consumers and create units that are accessible and sustainable.
- Create more walkable communities that offer proximity to commercial corridors.

Office of the Director

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Additional recommendations not in the Clarksburg Gateway Sector Plan:

- Private developers should be encouraged to collaborate with non-profit organizations as well as DHCA to reach maximum affordability.
- Encourage "active" play space for children in developing new housing.
- While Clarksburg is different in that the majority of housing in the community is newer, all efforts should be made to also reinvest in older units to ensure safety and non-displacement of current residents, while maintaining a "no net loss" approach.

Thank you for the opportunity to comment on this Plan.

cc: Claire Iseli, CEX
Meredith Wellington, CEX



DEPARTMENT OF PERMITTING SERVICES

Marc Elrich
County Executive

Rabbiah Sabbakhan
Director

MEMORANDUM

September 10, 2025

To: Karen Olsen Salazar
From: Rabbiah Sabbakhan, Director *Rabbiah Sabbakhan*
Subject: **Clarksburg Gateway Sector Plan – Department of Permitting Services Comments**

The Department of Permitting Services submits the following comments regarding energy code compliance. Beginning in 2025, new construction over 20,000 square feet must provide 33% of its energy needs through renewable energy, which is often met with photovoltaic systems. In the coming code cycles, this number will increase to 66% and ultimately 100%. As of now, we allow projects to procure off-site renewable energy at a 1:1 ratio, but it should not be expected to be that way in the future.

We anticipate lowering the “value” of offsite renewable energy to promote onsite renewable energy by reducing that ratio to as low as .5:1. It is critical to inform future developers of these requirements, as they will impact rooftop space, and potentially push developers to install ground-mounted solar arrays (potentially over parking). Consideration should be given to allow public and shared spaces to “host” development solar installations in which projects can participate, helping them meet their energy code requirements.

Additionally, all new residential zones need to be oriented to maximize solar exposure. The residential energy code will continue to advance towards net-zero energy-ready goals, which will require significant roof space and more importantly, roof orientation (ESE, SE, S, SW, WSW, with South being optimal). When roadways and neighborhoods are being developed, it is critical for building plots to have a more solar-oriented design and a less “flowing” design. This information should also be provided in any design guidelines to avoid conflict between planning desires and code requirements.

Rabbiah Sabbakhan
Director

C: Claire Iseli
Meredith Wellington



Marc Elrich
County Executive

Christopher R. Conklin
Director

DEPARTMENT OF TRANSPORTATION

MEMORANDUM

September 12, 2025

TO: Artie Harris, Chair
Montgomery County Planning Board

FROM: Haley Peckett, Deputy Director for Transportation Policy
Department of Transportation

SUBJECT: Clarksburg Gateway Sector Plan
Public Hearing Draft – MCDOT Agency Comments

Thank you for the opportunity to review the July 2025 Public Hearing Draft of the Clarksburg Gateway Sector Plan. We support the overall goal of expanding travel options and accessibility through the Clarksburg area, including the development of a denser grid network of streets, proposals for new bike and pedestrian connections, and continued emphasis on the growth of the Bus Rapid Transit (BRT) and express bus network. However, we want to express our concern that the proposed level of growth may lead to significant negative impacts on the transportation network, even with new transit and road investment. Additionally, we offer the following comments on the Observation Drive realignment, removal of the proposed Little Seneca Parkway interchange, and proposal for BRT service.

- 1) **TRANSPORTATION METRICS:** The Plan's transportation metrics (Appendix K) move notably in the wrong direction. *MCDOT expresses concern that, based on the results of the travel model, the Plan will reduce overall job accessibility, increase travel time and increase vehicle miles traveled (VMT)* as compared to the existing Plan as well as to present conditions. This is an area of the county that already experiences some of the longest travel times across all modes and experiences significant job and services accessibility challenges. Clarksburg residents frequently lead with concerns about traffic congestion and accessibility during public engagement events.

Across all three infrastructure scenarios, residents will have access to fewer jobs within 45 minutes of vehicle travel (between 20,000 to 40,000 fewer jobs, as compared with the baseline scenario). Average vehicle travel time increases roughly by one minute in the

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three scenarios, compared to baseline, and two minutes compared to present day conditions. Transit travel time increases by roughly an additional three minutes (to between 66-67 minutes total), even with significant additional transit infrastructure and service assumed. Buses will travel slower due to increased congestion, while still having to travel long distances to desired destinations. With these lengthening transit times, the model shows that transit cannot reasonably serve as an alternative for most trips. Quality of service across all modes will be degraded.

As the analysis concludes, the transportation metrics perform poorly due to proposed changes to land use. The Plan expects to result in an additional 8,800 new residents and 2,500 new jobs. As a transportation agency, we are not the experts on housing or job needs for the County. However, we can see that the growth proposed in the Clarksburg Plan runs a high risk of not meeting Adequate Public Facilities requirements, even if we were to invest in all infrastructure envisioned in the Plan. Given the distance between Clarksburg and regional activity and employment centers, we are concerned that the level of population growth proposed will exacerbate current levels of congestion.

We would request that Planning share results of modeling scenarios using lower future growth levels to better determine the sensitivity and performance of the three proposed infrastructure scenarios. MCDOT is concerned that, as proposed, there is not adequate transportation capacity and multimodal transportation options to accommodate the proposed land use changes. However, we would be interested in exploring options at lower levels of growth.

- 2) **OBSERVATION DRIVE BRIDGE LOCATION AND ALIGNMENT:** The Plan proposes to shift the alignment of Observation Drive to the west to intersect with Gateway Center Drive in the north. This will remove the alignment from the Little Seneca Creek and Coolbrook Tributary stream valleys. *MCDOT supports the revised recommended alignment*, including retaining the Little Seneca bridge alignment, as this will reduce environmental impacts, reduce construction constraints, and support proposed new communities. However, the new alignment will increase the overall project schedule, as much of the prior planning and design work underway prior to the Master Plan process will not be applicable.

As proposed in the Plan, *MCDOT recommends that the Plan maintain the existing Little Seneca bridge crossing alignment* to limit design changes to current bridge plans, environmental impacts, and property needs. The remainder of the alignment north of the bridge should respect topography, natural resources, property boundaries, and redevelopment potential while providing a direct path of travel to minimize VMT and transit travel time.

- 3) **OBSERVATION DRIVE CROSS SECTION:** The Plan proposes to limit the cross section of Observation Drive to two travel lanes and two dedicated bus lanes (one travel lane and one bus lane in each direction). The prior configuration included four travel lanes (two in each direction). The reduced capacity of Observation Drive may limit its utility as a bypass of MD 355, as prior plans had imagined. With this recommended capacity reduction for Observation Drive, *MCDOT recommends that the Plan include parallel north-south road connectivity through the proposed street grid* to provide additional capacity and redundancy for this area. This concept appears to be implicit in the proposed framework,

but a secondary corridor is not explicitly identified. We suggest that multiple smaller roads are more effective than one larger road to provide network redundancy.

As an interim condition, Planning Staff is recommending that the bus lanes be used as general-purpose lanes until BRT/express bus operations are initiated, at which time the lanes could be switched to dedicated bus lanes. MCDOT supports this approach based on similar approaches implemented in the Crown area of Gaithersburg on Fields Road (a County road) and Decoverly Drive (a City street). In both cases, development fronts the road and additional width for on-street parking is provided. The resulting sections have worked well for repurposing of the rightmost travel lane as a bus-only lane. However, MCDOT acknowledges challenges with assuming lane repurposing, given that the future context is unknown to planners today.

Given plans to convert a travel lane to a bus lane, MCDOT recommends that the Plan include additional width for on-street parking and loading where development is proposed to front the road. In our observations, the parking lane reduces conflicts with the bus lane, including loading, drop-off, and parking and stopping maneuvers. A parking lane is not needed in areas where adjacent land use does not induce curbside demand.

- 4) **LITTLE SENECA PARKWAY INTERCHANGE:** The Plan proposes to remove the interchange between Little Seneca Parkway and I-270. Instead, the Plan proposes to extend Little Seneca Parkway as a two-lane bridge to the Cabin Branch community. ***MCDOT does not support this recommendation; instead, we suggest that the Plan maintain the interchange recommendation*** and explore a range of interchange options that can work with present and future conditions. We recognize that the interchange would only be feasible with state or federal funding. While neither is likely in the short term, the interchange could be integrated into future I-270 improvements, but only if it remains in the Master Plan.

The Plan's transportation analysis finds that the interchange (as studied in Scenario 2) would increase job accessibility by car by 20,000 in comparison to scenarios without the interchange. Additionally, neighborhoods near the interchange would experience drive time improvements of up to 3.3 minutes. Recognizing the travel model shows that improvements are limited to a few Traffic Analysis Zones (TAZs), MCDOT hypothesizes that travel time savings would extend to additional TAZs, based on our understanding of travel and land use patterns.

Maintaining the interchange recommendation is important to support potential commercial use in this Plan area. The additional connectivity to I-270 will reduce pressure on the MD 121 interchange to the north and the Father Hurley Boulevard interchange to the south. It will also reduce north-south travel on Observation Drive, reinforcing the preliminary recommendation to reduce its cross-section.

The bridge-only alternative would come at a high cost for little benefit. A non-interchange connection across I-270 already exists 1,000 feet to the south using West Old Baltimore Road. MCDOT believes that the cost of constructing the overpass without an interchange is not justified.

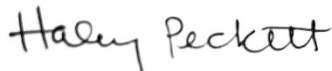
The Plan should recommend that any future interchange configuration support the goals of compact design, urban character, and significantly reduced environmental impact. For instance, the footprint of the interchange should be minimized to avoid impacts to adjacent streams, forest and developable areas. The reduced-footprint interchange should convey a “local road” character for Little Seneca Parkway to serve the planned new community and existing Cabin Branch community. Options should consider a minor realignment of southbound I-270 within its right-of-way to increase the space available. The Plan should also recommend that any major adjacent development provide support for the interchange, including producing initial designs and providing necessary land dedication.

- 5) **PROPOSED BRT/PARK AND RIDE:** The Plan reimagines the Milestone/COMSAT East Clarksburg Corridor Connector as a full BRT with dedicated lanes and stations, travelling from Clarksburg Town Center in the north to Germantown Town Center in the south. ***MCDOT recommends that the Corridor Connector designation remain without specifying a service type.*** We recommend a flexible approach to bus infrastructure along the corridor. We do not want to make a commitment to any specific design or service (eg, BRT vs. express bus) until additional study and/or preliminary designs have been completed. Maintaining a flexible recommendation will accommodate an operational needs-based analysis in the future to determine the type of service.

MCDOT recommends that the Plan consider a location(s) for a regional intercept park-and-ride facility. There are few, if any, locations for such a facility elsewhere along I-270. Such a facility would allow greater access to transit for riders beyond station walksheds in Clarksburg. A parking facility would also reduce the burden on small park-and-ride lots in Germantown, which route regional traffic through Town Centers. The Little Seneca Parkway interchange area or the northern extent of Observation Drive may be useful intercept locations for long distance commuters from the north, reducing traffic impacts to town centers and residential areas.


Thank you again for opportunity provide comment on this important Plan. If you have any questions, please feel free to reach out to me.


Sincerely,




Haley Peckett
Deputy Director for Transportation Policy
Montgomery County Department of Transportation



cc: Chris Van Alstyne, MCDOT
Corey Pitts, MCDOT
Andrew Bossi, MCDOT
Clark Larson, MNCPPC
Richard Brockmyer, MNCPPC

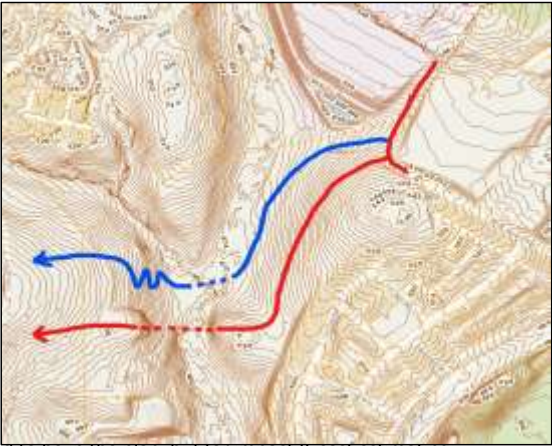

0		Team	Commenter	Page	Section	Summary	Comment
1		Policy	CVA	37	Overall	Critical Comment	MCDOT recommends that the plan maintain the existing Little Seneca bridge crossing alignment to limit design changes to current bridge plans, to environmental impacts, and to property needs. The remainder of the alignment north of the bridge should respect topography, natural resources, property boundaries, and redevelopment potential while providing a direct path of travel to minimize vehicle-miles-traveled and transit travel time.
2		Policy	CVA	43	Overall	Critical Comment	Observation Drive Cross Section: The Plan proposes to limit the cross section of Observation Drive to two travel lanes and two dedicated bus lanes (one travel lane and one bus lane in each direction). The prior configuration included four travel lanes (two in each direction). The reduced capacity of Observation Drive may limit its utility as by-pass of MD 355, as prior plans had imagined. MCDOT will await traffic analysis to ensure this lane reduction will not result in a meaningful degradation in area-wide through movement. With this recommended capacity reduction for Observation Drive, MCDOT recommends that the plan include parallel north-south road connectivity through the proposed street grid to provide additional capacity and redundancy for this area. This concept appears to be implicit in the proposed framework, but a secondary corridor is not explicitly identified. We suggest that multiple smaller roads are more effective than one larger road.
3		Policy	CVA	43	Overall	Critical Comment	As an interim condition, Planning Staff is recommending that the bus lanes be used as general-purpose lanes until BRT/express bus operations are initiated, at which time the lanes could be switched to dedicated bus lanes. MCDOT supports this approach based on our experience with lane repurposing elsewhere. A similar approach was implemented in the Crown area of Gaithersburg both on Fields Road (a County road) and Decoverly Drive (a City street). In both of these cases, development fronts the road and additional width for on-street parking is provided. The resulting sections have worked well for repurposing of the rightmost travel lane as a bus-only lane.
4		Policy	CVA	39	5-D	Critical Comment	<p>The Plan proposes to remove the interchange between Little Seneca Parkway and I-270. Instead, Little Seneca Parkway is proposed to extend as a two-lane bridge to the Cabin Branch community. MCDOT does not support this recommendation at this time; instead, we suggest that the plan maintain the interchange recommendation and explore a range of interchange options that can work with present and future constrained conditions. Additionally, a connection across I-270 is already possible a short distance to the south using West Old Baltimore Road. The cost of constructing the overpass without an interchange does not appear justified if it does not facilitate connectivity to I-270.</p> <p>Maintaining the interchange is important to support potential commercial use in this plan area. The additional connectivity to I-270 will also reduce traffic pressure on the MD 121 interchange to the north and the Father Hurley Boulevard interchange to the south and will reduce north-south travel on Observation Drive, reinforcing the preliminary recommendation to reduce its cross-section. Increased connectivity to I-270 will also reduce vehicle-miles traveled through residential and proposed town center areas both within and outside this plan area, resulting in improved safety and reduced negative impacts from through traffic flow.</p> <p>The plan should consider a range of configuration options for this interchange that aim to maximize benefit while minimizing impacts and costs. The footprint of the interchange should be minimized to avoid impacts to adjacent streams, forest and developable areas. The reduced-footprint interchange should convey a “local road” character for Little Seneca Parkway to serve the planned new community and existing Cabin Branch community. Options should consider a minor realignment of southbound I-270 within its right-of-way to increase the space available. A compact diamond interchange, possibly with roundabout ramp terminals may be appropriate. A partial example of this type of interchange can be found at Old Columbia Pike and US 29, just to the north of Burtonsville.</p>


0		Team	Commenter	Page	Section	Summary	Comment
5		Policy	RT	34	Transportation	Critical Comment	the only proposal to reduce imperviousness is to remove travel lanes. The number of residential dwelling units should also be considered to be reduced so that the roads don't become congested. The suggested notion that having transit will make people take it, won't work as you will never achieve the level of congestion and the area is too far out of where people work.
6		Policy	RT	39	Transportation	Critical Comment	1-270 interchange should be left in the plan to allow for future development. Without it, all you get are homes with no way to get around due the existing roads being congested. No one wants to build a bridge that doesn't bring additional economic prosperity. The ramps should remain. (HP - Concur and also note that unlike other roadway capacity improvements, this would likely only advance if funded by MD or FHWA as part of the I-270 Phase 2 improvements. Additionally, this interchange would transfer VMT from local roads to the interstate and therefore allow local roads to be safer and more hospitable to transit/walking.)
7		Transit	BM	19-20	Transportation	Critical Comment	The Plan refers to BRT and Enhanced Stations along Observation Drive. This is unlikely to be BRT, but instead some sort of express bus. The term 'BRT' should be removed from the text and framework graphic as it not actually going to be Flash BRT. The planned MD 355 Flash service will operate along Stringtown Road.
8		Policy	HP	K 18	Travel Analysis	Critical Comment	Planning notes that Scenarios 1-3 perform very similarly, and "land use changes alone generally drive the direction of metric differences between the baseline 2045 and the scenarios." The magnitude of land use changes makes it difficult to compare between the scenarios. MCDOT would like to see how the scenarios perform in an interim or reduced growth outlook. We'd be interested in understanding how the various scenarios perform in the event of 25% or 50% of buildout.
9		Policy	HP	K 16-17	Travel Analysis	Critical Comment	<p>Overall, all metrics move significantly in the wrong direction. The number of jobs accessible goes down by 20K-40K from baseline. Transit travel time <i>increases</i>, even with significant additional transit service assumed, meaning buses are stuck in traffic. MCDOT is concerned that there is not transportation capacity to accommodate the proposed land use changes. Given the distance of Clarksburg from other destinations in the region and the jobs/housing imbalance in the Clarksburg area, we are concerned that the level of population growth proposed will lead to unacceptable levels of congestion for many key routes. Even with growth focused on transit corridors, transit cannot reasonably accommodate the growth due to limited capacity of buses and large distances between O/D.</p> <p>The only metric that appears to be driven by transportation infrastructure assumptions is the auto accessibility, which performs significantly better under Scenario 2, likely due to the added interchange.</p>
10		Policy	ADB	Appx K: p16-17 p24	Master Plan Adequacy Performance Metrics Impact of Removing I-270 / Little Seneca Parkway Interchange	Worsening Results	<p>Compared to the Baseline all scenarios:</p> <ul style="list-style-type: none"> - Worsen auto job accessibility - Worsen transit job accessibility - Worsen auto travel times - Worsen transit travel times - Worsen VMT per capita <p>The only metric that appears to improve is NADMS, which is somewhat moot alongside the increases in VMT.</p> <p>Furthermore, Scenario 1 (the Recommended Scenario) appears to fare the worst of all the scenarios.</p> <p>This implies that this current plan does not meet the transportation adequacy goals established by Council.</p>
11		Policy	CVA	42	Street Classification and Right-of-Way Recommendations	Critical Comment	While curbside and shared streets are an interesting concept we want to advance, it seems unlikely Street A would work as such. Being the continuation of a significant street and providing access to the commercial core, this is likely to be quite heavily trafficked. Without dedicated bike facilities, it will likely be a very high stress environment.


0		Team	Commenter	Page	Section	Summary	Comment
12		Policy	CVA	43	3-B	Normal Comment	We recommend that additional width for on-street parking and loading be provided where development is proposed to front Observation drive. The parking lane reduces loading/drop-off and bus lane obstructions and the bus lane reduces conflicts with parking and stopping maneuvers. In other areas, where this additional space for parking and loading is not provided, we have observed greater conflicts with the repurposed bus lanes. A parking lane is not needed in areas where this interaction with adjacent land use does not occur.
13		Policy	RT	34	Transportation	Normal Comment	most of this area is newly built. MCDOT or any other developer will not rebuild any of these streets and most already meet complete streets. New roads should be constructed to enhance people's mobility until more transit options are funded and operational.
14		Policy	RT	37	Transportation	Normal Comment	Observation Drive should be considered an alternative to MD 355 and should be designed to be economical where it does not represent something that is infeasible to be built due to environment or construction costs.
15		Policy	HP	38	Transportation	Normal Comment	A Circulator type route may infeasible to operate unless there is clear demand from Clarksburg residents. This simply may not connect enough residents to destinations. There should be a caveat, such as "if further study warrants this service".
16		Policy	HP	39	Transportation	Normal Comment	Consider adding a goal to street network "Efficiently and safely direct vehicles traveling outside of Clarksburg to I-270 and major arterials to reduce traffic volumes on local roads."
17		Policy	HP	52	Transportation	Normal Comment	We can expand a dockless service area but it's not clear there's a viable business model for dockless in Clarksburg, given the distance for vendors to maintain. The County may prefer to prioritize location incentives to areas with greater equity needs.
18		Policy	HP	K 25	Travel Analysis	Normal Comment	MCDOT questions some of the O/D assumptions, in that we believe that Scenario 2 should pull traffic off of local roads and onto 270. The Gateway Center/Stringtown intersection shows much better performance under Scenario 2 (we don't know what the mitigation is for Scenario 1).
19		Policy	HP	K 27	Travel Analysis	Normal Comment	MCDOT believes that the Cabin Branch area (and potentially other TAZ) would have travel time savings from the interchange.
20		Policy	HP	K 20	Travel Analysis	Normal Comment	We assume that the NADMS goals are driven by greater pedestrian and bike connectivity, as well as increased transit? It would be interesting to learn more about how this changes from current.
22		Policy	CVA	40	Street Network	Normal Comment	It's not really clear what the bold letters on the Master Planned Roadways Network Map refer to
23		Policy	ADB	39	Transportation	Growth Corridor Limits	RE: #7 "Designate Observation Drive as a Growth Corridor, instead of Frederick Road" Consider providing a map to show how exactly this would work. Does this imply that the MD 355 Growth Corridor ends abruptly at MD 118, where it shifts over to continue on Observation?
24		Policy	ADB	39	Transportation	Growth Corridor Classification	RE: #7 "Designate Observation Drive as a Growth Corridor, instead of Frederick Road" Just to confirm: is this only a "Growth Corridor" insofar as a Thrive designation, and now a street classification? The map on p40 shows Observation as a Town Center Boulevard.


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25		Policy	ADB	42 46	Transportation	Commercial Shared Street	<p>While the Code does use Residential & Commercial Shared Street as placeholders, since the publication of the Curbless & Shared Streets Design Guide (and also in the pending Ch.49 Regs about to be published in the Register) we are going to be using "Curbless Street" and "Shared Street" into the future.</p> <p>Consider changing all references of "Commercial Shared Street" to "Curbless Street", which appears to correspond to the size, alignment, traffic loading, and target speed of the roadway.</p>
26		Policy	ADB	44	Transportation	Cross-Sections	<p>RE: Cross-Section D, Little Seneca Pkwy Ext</p> <p>Consider whether a median is necessary.</p> <p>If it is: the 4' median should be shown as monolithic concrete, as that is what would be constructed in such a narrow width. If greenery is desired within the median it needs to be at least 6' wide.</p>
27		Policy	ADB	45	Transportation	Cross-Sections	<p>RE: Cross-Section F, W Old Baltimore Rd</p> <p>7' parking lanes are substandard and not acceptable for a master planned facility such as this.</p> <p>Either identify a means of widening to 8', or consider the need for the parking lanes in the first place.</p>
28		Policy	ADB	45	Transportation	Cross-Sections	<p>RE: Cross-Section G, New Street A</p> <p>The Bike Master Plan (and reaffirmed by Complete Streets and the Ch.49 regs about to be published in the Register) specify that bikeways should be within the Active Zone; not the Street.</p> <p>As this is essentially a greenfield site we should not be planning for substandard facilities.</p>
29		Policy	ADB	47	Transportation	Cross-Sections	<p>RE: Cross-Section A/B, Observation Dr Interim</p> <p>The text notes on p46 constructing the Active Zone facilities along Observation Dr in their ultimate location, but the interim cross-section does not reflect this.</p> <p>The interim has an 8' Street Buffer on the west side, and a 7' Street Buffer on the east side. The 105' Typical has an 8.5' Street Buffer on the west, and a 6.5' Street Buffer on the east.</p> <p>It's an easy fix: just move 0.5' from one side to the other. I suggest moving it in the Interim from the east side to the west side.</p>
30	*	Policy	ADB	47	Transportation	Street Names	<p>RE: #20, renaming portions of the old Observation alignment</p> <p>Consider at some point also, for consistency, renaming Gateway Center Dr to Observation Dr.</p>

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31	** *	Policy	ADB	49-50	Transportation	<p>Additional Trail Connections</p> <p>Consider extending Roberts Tavern Dr as a trail to Gateway Center Dr (approx 750')</p> 
32	** *	Policy	ADB	49-50	Transportation	<p>Additional Trail Connections</p> <p>Consider extending the existing north section of Observation Dr as a trail southeastward from the Clarksburg Square community to Brick Haven Way, linking the area to the schools -- something frequently requested during community meetings. This may also double as a recreational trail within the forested area. This might be implemented by MCDOT or by Parks.</p>  <p>This detail does not need to be in the plan, but for impact & cost estimating: This would be a length of approx 2450' and include one bridge across the Coolbrook Stream, likely spanning from the steep west bank directly to the top of the east bank by the high school's athletic fields (a 400' long gap).</p>

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33	** *	Policy ADB	49-50	Transportation	Additional Trail Connections	<p>Consider extending Wims Rd as a trail westward from Brick Haven Way to the new Observation Dr alignment to link the schools and the new activity center -- something frequently requested during community meetings. This may also double as a recreational trail within the forested area. This might be implemented by MCDOT or by Parks.</p>  <p>This detail does not need to be in the plan, but for impact & cost estimating: This would be a length of approx 1800' and include one or two bridges across the Coolbrook Stream. It might generally follow existing grades on the east bank, either crossing with a bridge of about 380' to the west bank or using a shorter bridge over the stream and using switchbacks on the west bank.</p>
34	** *	Policy ADB	49-50	Transportation	Additional Trail Connections	<p>Consider extending Shawnee Ln as a trail westward across I-270 to Petrel St &/or the Outlets parking lots, more directly linking this plan area with Cabin Branch. This would be implemented by a mixture of new development (the east side) and MCDOT/SHA (structures & west side)</p>  <p>This detail does not need to be in the plan, but for impact & cost estimating: This would be a length of approx 1850'-2500' and include between 1 to 3 structures across I-270, Cabin Branch, and Little Seneca Creek. The above image shows three segments (the lower segment with two different potential alignments), of which only 1 or 2 segments would be necessary for connectivity.</p>

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35		Policy	ADB	50	Transportation	Show Trail Connections	Show the trail connections from p49 also on the map on p50.
36		Policy	ADB	50	Transportation	Bicycle Parking Stations	Figure 13 shows several Bicycle Parking Stations, but there is no accompanying narrative describing these. Pull info for these from the Bike Master Plan and add into this section.
37		Policy	ADB	54	Community Design	On-Street Parking Priority	RE: S4, "All new streets should accommodate on-street parking, where possible" Consider whether this is intended to affect Complete Streets' Prioritization, which generally assigns Parking (Curbside Zone) a Low or Medium Priority. Parking areas are often among the first to be cut from a cross-section when necessary to achieve other purposes, such as larger Active Zones. Is it the intent of the plan that in such cases: parking be preserved & Active Zone elements be narrowed?
38		Policy	ADB	58	Community Design	Alley Landscaping	RE: K4c, "Incorporate landscaping within alleys to help soften their utilitarian purpose" Is it the intent that alleys have landscaping *within* their cross-section, or *along* their cross-section? I suggest changing this to "along" If it is indeed within: note that the 16' Residential and 20' Non-Residential Alley cross-sections do not allow any space for landscaping. Additional ROW will need to be dedicated to implement this recommendation.
39		Policy	CVA	100	Capital Improvements Program	Blank table	The CIP table is empty; this should include all new large-scale projects (particularly the little seneca extension, large bike/ped projects, and wildlife bridges)
40		Policy	ADB	General	General	Glossary	Consider including a Glossary of Terms. Previous master plans have done some good work drafting these; consider copying from examples such as the Veirs Mill Plan and updating as needed with any new terms.
41		VZ	WH	49	21	Traffic Calming	In general, master plans should not be recommending operational studies or interim facilities. Recommendations need to conform with Planning's role.
42		VZ	WH	52	25	Brick Pavers	Brick pavers are not recommended due to accessibility and maintenance concerns.
43		Policy	ADB	77	Parks, Open Spaces, and Recreation	Wildlife Passage Separation	RE: "Wherever possible, the roadway should be separated from the wildlife passage by fencing or jersey barriers" Consider rephrasing this to "The roadway should be separated from the wildlife passage, such as with fencing or jersey barriers" Rationale - There may be many different means of separation, and jersey barriers might be consider both unsightly as well as rather ineffective at wildlife separation. Also removing a use of "possible"

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44		Policy	ADB	General	General	Possible vs Feasible	<p>Review all uses of the word "possible".</p> <p>The word "possible" implies something that is fiscally unconstrained. Consider replacing with the word "feasible" which more clearly establishes bounds.</p> <p>Some specific examples to consider are:</p> <ul style="list-style-type: none"> - p57, #S4 - "All new streets should accommodate on-street parking, where possible" - p68, #7 - "exceed standards where possible" - p77, left column, last paragraph - "Bridges should be as long as possible" - p77, right column, top paragraph - "culverts should be as large as possible" - p77, right column, top paragraph - "Open-bottom culverts with natural substrate should be utilized when possible." - p77, right column, last paragraph - "Where a 150-foot buffer is not possible"
45		Policy	ADB	Appx K, p23, 33-95	Impact of Removing I-270 / Little Seneca Parkway Interchange	Observation & Ridge	<p>How is traffic being distributed without the interchange? What are is heading south toward Observation/Ridge as compared to north toward Clarksburg/Stringtown?</p> <p>It's a surprise that Observation/Ridge is functioning at D/D. Confirm the traffic distribution doesn't disproportionately weight toward the Clarksburg/Stringtown, minding that travelers may be pre-disposed to go south toward Ridge if their ultimate destination is southward.</p>
46		Policy	ADB	Appx K, p27-29	Impact of Removing I-270 / Little Seneca Parkway Interchange	Cabin Branch Travel Time Deltas	<p>In the figures showing the change in travel times with/without and interchange: why doesn't Cabin Branch benefit? Given their proximity it is a surprise that they show no changes.</p> <p>Is it due to the Transportation Analysis Zone being too large & encompassing all of Cabin Branch?</p>
47		Policy	ADB	27, 34, 63, 67	General	Impervious Surfaces	<p>Consider how impervious limits are tallied insofar as planned infrastructure.</p> <p>These limits should not restrict the implementation of master planned infrastructure, noting past difficulties with building new bikeways within the Ten Mile Creek area.</p>
48		Policy	HP	K 4	Travel Analysis	Normal Comment	Agree with long-term project assumptions listed on page 4.
49		Policy	ADB	36	Transportation	PLOC Map	Consider resizing Figure 9 (the PLOC Map) onto its own page to improve legibility.
50	*	Policy	ADB	38	Transportation	Lakewood Dr	Is Lakewood Dr the correct street? I'm not recalling where this is nor finding it online, but I'm guessing it's either Lake Ridge Drive, or the future extension of Cabin Branch Ave?
51		Policy	ADB	39	Transportation	Reference Errors	RE:#\$8 - Fix the two reference errors
52		Policy	ADB	73	Parks, Open Spaces, and Recreation	State Highway Assc	Under #8, change "State Highway Association" to "State Highway Administration"
53		VZ	WH	88	Telecommunications	Recommendations	The plan notes that residents expressed concerns about spotty cell phone service. Is this something that is regularly in a master plan? If so, should the plan recommend areas for additional towers?
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MCPD Impact Report: Clarksburg Gateway Sector Plan

Overview

The Clarksburg Gateway Sector Plan presents a transformative vision for approximately 969 acres on the eastern side of I-270. The plan anticipates a population increase to over 30,000 residents, representing an estimated 2.5% growth in Montgomery County's overall population. The proposed development includes mixed-use housing, expanded transit infrastructure, commercial and recreational amenities, and significant environmental and community design enhancements.

While the plan projects that public safety and patrol services will remain "adequate" over the 20-year planning horizon, the Montgomery County Police Department (MCPD) recognizes that the scale and nature of the proposed development will likely result in a proportional increase in calls for service. This is particularly expected as the population grows and new commercial, residential, and transit nodes are activated.

MCPD Impact Considerations

1. Population Growth and Service Demand

The anticipated population increase is expected to result in:

- A higher volume of both emergency and non-emergency calls for service.
- Increased demand for traffic enforcement, patrol coverage, and investigative resources.
- Potential impacts on response times, depending on future staffing levels and resource allocation within the 5th District.

2. Transit-Oriented Development and Crime Patterns

The introduction of the Clarksburg-Germantown Corridor Connector (BRT) and enhanced bus routes may:

- Increase transient populations, particularly around transit hubs and park-and-ride facilities.
- Require enhanced patrol visibility and presence at key transit nodes.
- Present opportunities for crime displacement or importation from other jurisdictions, as improved connectivity may allow individuals from outside the area to more easily access Clarksburg.

3. Community Outreach and Engagement

As new residential and commercial developments emerge, there will be a growing need for:

- Expanded community policing initiatives to build trust and familiarity with new residents and business owners.
- Proactive outreach programs to address safety concerns, educate the public on crime prevention, and foster collaboration between law enforcement and the community.
- Increased presence at public meetings, HOA gatherings, and business forums to ensure that police services are responsive to evolving community needs and expectations.