



Protecting a clean water source
for the Washington D.C. region

Date: September 25, 2025

To: Montgomery County Planning Board Commissioners

From: Friends of Ten Mile Creek and Little Seneca Reservoir

Subject: The Draft Clarksburg Gateway Sector Plan - Concerns & Recommendations

Dear Commissioners,

The Friends of Ten Mile Creek and Little Seneca Reservoir (FOTMC) are grateful for the many opportunities we've had to work with staff in the formulation of the Clarksburg Gateway Sector Plan (CGSP). FOTMC has actively engaged in all phases of the CGSP. We participated in the CGSP Kickoff in July 2023 as well as the subsequent listening sessions in October 2023. We reviewed the June 2023 Scope of Work and the Existing Conditions Report presented to the Planning Board on November 30, 2023. We participated in the May-June 2024 Community Visioning Workshops, where we reviewed the various scenarios presented and engaged in discussions with staff. We attended the staff's presentation at Rocky Hills Middle School on January 14, 2025. And most recently, we viewed the Staff's presentation to the Planning Board on July 31, 2025. We shared our concerns and recommendations with staff during each of these sessions, which we formalized in previous letters sent to CGSP staff in January and July of 2024 and February 2025. This testimony summarizes where we agree with the planning staff's decisions, as well as our ongoing concerns and recommendations.

AREAS OF AGREEMENT

FOTMC is aligned with the sector plan's goal: "This plan seeks to protect existing forested and natural areas to the greatest extent possible..." (p. 64) In this vein, we support the following elements of the Draft plan:

- The elimination of the Master Plan Alignment for the extension of Observation Drive south to West Old Baltimore Road. This decision will preserve many acres of forest and avoid substantial environmental impacts on the Cool Brook Tributary and, consequently, on Little Seneca Creek.
- The removal of the Clarksburg/355 Bypass from the plan. This means the elementary school will remain and the headwaters, forests and wetlands of both Ten Mile Creek and the Cool Brook Tributary can be spared additional insults.
- The removal of the I-270 Interchange from the plan. The I-270 Interchange was the most destructive alternative for access to the sector plan area and unnecessary as two interchange access points, to the north and south, already provide this access.
- Turning the Cool Brook forested area into Cool Brook Stream Valley Park, with all natural surface trails.
- Preservation of an additional 8 to 10 acres of parkland to serve the community with a variety of uses such as a local park, community gardens and other community-oriented activities.
- The recommendation for a **minimum** 200-foot building setback from I-270, including a **minimum** 50-foot native tree buffer, to help minimize noise and air pollution impacts on residents from the highway. (FOTMC encourages an even greater setback based on studies that show harmful effects of air pollution at much greater distances.)
- The narrowing of roadways, if new roads are built.

FOTMC'S PRIMARY CONCERNS AND OBJECTIVES

As we have expressed in previous letters, FOTMC's primary concerns are to protect and restore the health of the streams, conserve the forests, and ensure a clean drinking water supply.

This requires that the Clarksburg Sector Plan:

- Safeguards water quality in the two main tributaries that originate in the Sector Plan area and flow to the Little Seneca Reservoir, which serves as a reservoir that provides additional water flow to the Potomac River, a public water supply, during drought periods.
- Conserves the remaining 285 acres of forest occurring within the 969-acre sector plan boundary

- Avoids the construction of new roadways through forests, parks, streams, stream valleys, and wetlands
- Limits development, and hence limits impervious surfaces, on the site of the historic COMSAT building, and
- Protects the health of the Little Seneca Reservoir by protecting Little Seneca Creek, which is the largest tributary feeding into Little Seneca Lake Reservoir.

Consistent with the Draft plan's guiding principle of choosing alternatives that pose the least damage to the environment, we offer the following comments and recommendations for you to consider as you evaluate this plan:

FOREST PROTECTION

Priority Urban Forest Preservation. The State of Maryland has designated nearly all of the forests in this plan area as Priority Urban Forests. These are forests that the State considers *priorities for retention and protection*. This designation provides the foundation to choose alternatives that cause the least damage to the environment. **But unless these forested areas are actually preserved, the goal of the Priority Urban Forest designation will not be achieved.**

In addition to preservation of the forests within the stream buffer along the Cool Brook Tributary, we recommend the following **Priority Urban Forests** areas be preserved:

- **The four largest forested areas on the COMSAT property:** (1) the forest at the northern property boundary, which is part of another forest area that is already in a Category 1 conservation easement; (2) all the forests alongside the Cool Brook Tributary; (3) all the forested area at the southern end of the COMSAT building (abutting the parking lot), which could be impacted by the southern extension of Gateway Center Drive; (4) the forest strip along the southeastern property border (abutting the Linthicum property) leading to West Old Baltimore Road, which could be impacted by the extension of the north/south Gateway Center Drive.
- The forests within the proposed alignment of the northern **extension of Observation Drive, east of Little Seneca Creek, is also a Priority Urban Forest**, and it needs to be preserved. The northward extension of Observation Drive would devastate this forest.

Additional Forest Preservation

- **We advocate for the preservation of the forest abutting I-270 on the Linthicum property.** The Plan designates a new alignment for the northward extension of Observation Drive that would cut through the forest abutting I-270. While the Plan states that the re-alignment of Observation Drive closer to the western property line of the Linthicum Farm Property would “minimize potential adverse impacts to stream valley buffers” (p.39), it does not appear that this re-alignment really has any impact on the Little Seneca stream buffer. However, the new alignment would devastate the forest abutting I-270, which for some inexplicable reason was not designated as a Priority Urban Forest.

Stream Buffer Expansion in the Clarksburg Special Protection Area (SPA)

In the vein of forest and protection of the sensitive water resources, **we support the expansion of stream buffers, beyond what the SPA requires, along all waterways in the sector plan area**, which lies entirely within the Clarksburg SPA. The health condition of the streams in the Clarksburg SPA has been in decline since 1998 due to intensive development within the Clarksburg SPA. Expanded buffers are imperative if the County is to salvage the Special Protection Area goal, which is “to protect and maintain high-quality or sensitive water resources.” Any development that takes place will impact the tributaries that feed into Little Seneca Creek, which empties into Little Seneca Lake Reservoir, which in turn flows to the Potomac River and contributes to the regional water supply. The adjacent Ten Mile Creek Special Protection Area offers a good model to follow. That SPA requires that buffers “on both sides of both perennial and intermittent streams, and adjacent to springs and seeps” must be a minimum of 200 feet. ([Ten Mile Creek 2014 Amended Master Plan](#), p.19).

Additionally, on the Linthicum properties north and south of West Old Baltimore Road, we urge the County to get more land preserved either through private conservation easements or public parkland dedication in the following locations to provide better stream protection:

- All along the western edge of Little Seneca Creek, and
- Along the western edge of the Cool Brook Tributary, above its confluence with Little Seneca Creek.

ROADWAYS

Gateway Center Drive Extended

Staff has indicated that they do not intend to use the existing Comsat Drive roads for the southward extension of Gateway Center drive. Instead, the Plan suggests a new road to be built east of the main COMSAT building. If a road is built on this alignment, we recommend utilizing the open areas to the maximum extent possible to avoid the taking of any Priority Urban Forest.

We support a less environmentally damaging alternative, which is to utilize the existing roads on the COMSAT campus to provide connectivity from the southern terminus of Gateway Center Drive at Shawnee Lane, heading south to West Old Baltimore Road. This existing north-south connectivity would serve as a neighborhood connector for any development on the COMSAT property and would avoid the environmentally damaging impact to the tree-covered areas.

Westward Extension of Little Seneca Parkway

We wholeheartedly concur with the decision to eliminate the I-270 interchange from the sector plan. An I-270 interchange would be extremely environmentally destructive and does not align with the 'local community' vision, nor is the money to build an interchange likely to be available.

However, the Little Seneca Parkway extension that you recommend for east-west connectivity between Route 355 (Frederick Road) and Lake Ridge Drive (on the west side of I-270), even without an interchange, would also severely impact the streams, wetlands, and forests as it crosses the Cool Brook Tributary and the Unnamed Tributary alongside I-270.

Rather than extending Little Seneca Parkway through forests and wetlands, our recommendation is to utilize the existing East-West transportation infrastructure – West Old Baltimore Road – that already links Route 355 to Lake Ridge Drive. West Old Baltimore Road has long-served East-West connectivity for automobile transportation into and out of the Sector Plan area. The road is wide enough to add bus stops and a shared-use path for pedestrians and bicyclists, and it can be further widened.

Observation Drive

Staff's plan to extend Observation Drive north to connect with Gateway Center Drive would have devastating environmental impacts on an area designated for **Priority Urban Forest** preservation. The northward extension of Observation Drive would cut through and destroy upland forests, cross floodplains, traverse wetlands and steep slopes, and sever the greenway park – all of which would seriously degrade the mainstream of Little Seneca Creek. In addition, staff's current alignment shows this northward extension cutting through the forest on the Linthicum property rather than traversing the open field, which is a far less destructive route.

We strongly urge the planners to forego consideration of the northward extension of Observation Drive south of West Old Baltimore Road due to the extensive environmental impacts as well as the costliness of the bridge and road construction.

DEVELOPMENT ON THE HISTORIC COMSAT BUILDING SITE

As the Clarksburg Sector Plan does not recommend preservation of the COMSAT building, the 34-acre environmental setting, as well as a large percentage of the rest of the 200-acre COMSAT property, could be developed. Spatially extensive redevelopment of this site would entail considerable additional impervious cover and the loss of Priority Urban Forests as well as other tree cover. **We urge you to prioritize the preservation of the four main forest areas in this part of the sector plan.** (See earlier discussion re: the 4 forest groves on the COMSAT site, which the State has designated as Priority Urban Forest.)

Since the COMSAT property drains into the Cool Brook Tributary and the Unnamed Tributary flowing alongside I-270, the loss of these forests would degrade these tributaries and undermine the County's Climate Action Plan goals. There is sufficient open space on this property such that any development plans (roads, houses, etc) can avoid impacting the COMSAT forest groves.

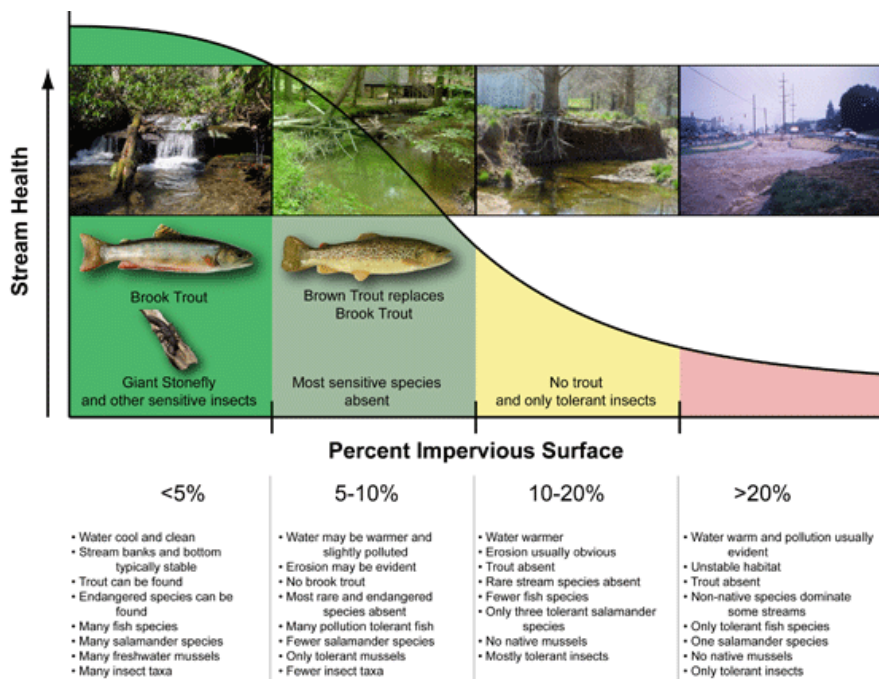
Regardless of whether the COMSAT building is preserved, we do not support turning the COMSAT Property into a major regional destination point with an excessive amount of housing, retail, dining and additional roads. Such extensive development would destroy forests, substantially increase impervious surface cover in the Clarksburg SPA, and lead to stream degradation that would further harm the water quality of Little Seneca Reservoir. We support scaling back development of the COMSAT property to harmonize with your vision of a compact community, not a regional hub. Scaling back will also contribute to reducing congestion on the roads.

While a thoughtful redevelopment of the COMSAT property centered around a preserved and adaptively re-used COMSAT building would be the best way to avoid and minimize damaging impacts to the forests, streams, and treed landscape, the sector plan does not support this. Therefore, **we recommend the next best alternative, which is to place development on the COMSAT property in open areas and capped to the extent that it can be supported with existing roads into and out of the Sector Plan area.**

We also support the proposal to set aside 8 to 10 acres of open area of the COMSAT property for community use, such as a local park, community gardens and other community-oriented facilities to support educational, recreational, and cultural activities.

IMPERVIOUSNESS, STREAM HEALTH, AND THE LONG-TERM HEALTH OF LITTLE SENECA LAKE RESERVOIR

Scientific evidence has established this basic relationship: *The greater the level of imperviousness, the greater the harm to the health of the watershed.* According to the [Maryland Department of Natural Resources](#), stream ecosystems deteriorate as a watershed’s imperviousness approaches 10%. The sensitive macroinvertebrates -- such as stoneflies and some mayflies and caddisflies – disappear. As imperviousness climbs beyond 10%, trout disappear, there are fewer fish species and only a few tolerant amphibian and insect species remain. Beyond watershed imperviousness of 20%, stream ecosystems no longer support a diversity of native aquatic life. Some tolerant native species can survive but non-native species dominate. (See DNR graphic below, “[How Impervious Surface Impacts Stream Health](#)”)



According to the [working draft plan](#) (p.63), “As of 2020, impervious surfaces covered roughly 21% of the Plan Area,” which is located entirely within the Clarksburg Special Protection Area.

Current data (from [MC ATLAS](#)) presents impervious percentage data for three points in the Clarksburg SPA: 32%, 31%, and 24%, respectively. The sector plan area occupies the majority of the 24% portion of the SPA, but also includes the drainage from outlet mall west of I-270, which flows into the unnamed Tributary that flows alongside I-270. According

to [Montgomery County Environmental Guidelines \(2021\)](#), “*The County’s goal in special protection areas is to protect and maintain high-quality or sensitive water resources and related environmental features in identified geographic areas where proposed land uses threaten those resources and a higher level of environmental protection is needed*” (p.24).

[The Countywide Stream Protection Strategy](#) shows that, pre-development (1994-1998), all the streams in the Clarksburg Special Protection Area were rated ‘good’ and ‘excellent’ (pdf p.155, II.12.4). However, the most recent DEP data (2020-DEP detailed maps) shows that, due to intensive development within the Clarksburg SPA, the condition of the majority of the streams has deteriorated. Despite the best intentions of the 1994 Clarksburg Plan and the SPA, stream health ratings are now listed in ‘good,’ ‘fair,’ and ‘poor’ condition. None are rated excellent anymore .

More development in the watershed means more impervious surface area, which means more polluted urban runoff into the streams, larger volumes and greater velocity of stormwater runoff, increased streambank erosion, and more sediment and pollution released into Little Seneca Reservoir, the region’s back-up water supply.

The 2014 Ten Mile Creek Amendment to the Clarksburg Master Plan called for a study of the long-term health of the Reservoir (p.47), but to date, a comprehensive, long-term study, including “the land use impacts from all watersheds draining into the reservoir,” has not been done. This is especially important because WSSC’s October 2020 Water Quality Evaluation of Little Seneca Reservoir (rec’d from Clark Larson) was limited in its scope and predated the intensive development in the Cabin Branch watershed and the developments that have recently begun in the Ten Mile Creek watershed. Furthermore, a December 14, 2020 Montgomery County Parks Department PowerPoint Presentation, “Algae Blooms and Our Local Lakes,” reported finding microcystin toxin in Little Seneca Lake and the Cabin Branch Forebay of Little Seneca Lake in August 2020. Given the ongoing developments in the Little Seneca Reservoir watershed, it’s important to know what impact the Clarksburg Gateway Sector Plan will have on the Little Seneca Reservoir.

Moreover, other jurisdictions in Maryland have stringent zoning protections for their water supply. The Little Seneca Reservoir does not. With no other zoning protections in place to restrict development, what will this plan do to protect the region’s back-up drinking water supply?

CONCLUSION

To achieve the SPA’s goal of watershed and stream protection, we urge you to carry out the SPA goals to “protect and maintain high-quality or sensitive water resources and related environmental features.” Preserving forests, limiting the extent of development, and utilizing existing roads are the least expensive and most effective ways to protect streams and water quality. These Earth-friendly environmental actions are critical to safeguarding water quality, improving air quality, combatting climate extremes, fostering native biodiversity, and protecting human health and the quality of life for all. Protecting a place is the same as protecting a part of ourselves.

Thank you for thoughtfully studying our comments and recommendations.

“What we have left is not enough. But it’s all we’ve got, and nothing less than all of it will do.”

Most Sincerely,

Anne Cinque, President
Friends of Ten Mile Creek & Little Seneca Reservoir

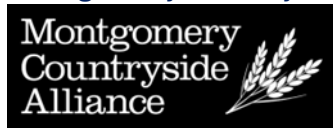


The following organizations have endorsed our testimony:

- Coalition to Stop Stream Destruction
- Conservation Montgomery



- Montgomery Countryside Alliance



- Sugarloaf Citizens Association



- TAME Coalition

