

From: [Leslie Saville](#)
To: [Johnson, Nana](#)
Subject: CU 23-11, Worldshine Homes
Date: Thursday, February 1, 2024 10:56:30 AM

[EXTERNAL EMAIL]

Dear Ms. Byrnes,

I am a former planner from Montgomery Planning, and I worked on the team that included Clarksburg from 2003 to 2021. In reading the technical staff report, I would like to add information to three findings.

- The findings of conformance with the master plan indicates that having 120 residents and 75 employees on a site that was master planned and zoned for no more than 10 single family homes hasn't been justified
- The analysis of the Clarksburg Special Protection Area and the site's impervious levels is inaccurate. Staff states that 15-19 percent impervious is to be expected in the R-200 zone, then they make findings in support of the proposed 34.7 percent impervious levels because the R-200/TDR zone averages 35 percent. Those zones are not the same and this property is not in the R-200/TDR zone, so this makes no sense. If a property were eligible to purchase TDRs to increase density, then there would be a public purpose (farmland preservation) being fulfilled in exchange for the greater density. That isn't happening on this site, and it didn't happen on the adjacent site. The adjacent site, which was zoned R-200/TDR-4, was eligible to build up to 4 units to the acre, but they did not. The density is about 2.44 units to the acre, and appears to have been approved under the R-200 MPDU cluster guidelines.
- Last, staff finds no non-inherent characteristics of the site. The location of the property within the Clarksburg SPA is a non-inherent characteristic. The adverse effects of the proposed impervious levels are not even analyzed in the staff report.

For these reasons, I ask that this application be denied. Should the applicant choose to revise the application to conform to the master plan and the R-200 impervious range, I ask that the case be remanded to technical staff for a full analysis.

Thank you very much for considering my comments.

/s/

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Exhibit 22 (l)
OZAH Case No: 23-11