



FRIENDS
OF
TEN MILE CREEK
&
LITTLE SENECA RESERVOIR

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

Date: January 21, 2026

To: Montgomery County Council President and Councilmembers

From: Friends of Ten Mile Creek and Little Seneca Reservoir

Subject: Testimony on the Planning Board Draft of The Clarksburg Gateway Sector Plan

Dear Council President and Councilmembers,

Friends of Ten Mile Creek and Little Seneca Reservoir (FoTMC) owns 52-acres of property, entirely in a forest conservation easement, on either side of Ten Mile Creek. Being landowners and caretakers in this special watershed has amplified our mission to protect the health of ALL the streams that flow into Little Seneca Reservoir, the back-up drinking water supply for 5 million people in the Washington D.C. region, as well as an important recreational and waterfowl resource.

Ten Mile Creek is a major tributary that flows into Little Seneca Reservoir. The Ten Mile Creek watershed abuts, and is part of, the Little Seneca Watershed, where the Clarksburg Gateway Sector plan developments would occur. Little Seneca Creek, which flows through the Clarksburg Sector plan area, is the other major tributary that flows into Little Seneca Reservoir.

The developments proposed in the Clarksburg Gateway Sector Plan (CGSP) will have an impact on Little Seneca Creek and its tributaries. To ensure that the Reservoir remains a clean drinking water supply, as well as a high quality recreational and waterfowl resource, the Sector Plan must **preserve the remaining forests, limit the extent of development, and utilize existing roads.**

HOW TO ACHIEVE THESE GOALS: FoTMC's CLARKSBURG SECTOR PLAN RECOMMENDATIONS

The following are fundamental to protecting water quality and the health of streams in the Sector plan that flow to the Little Seneca Reservoir:

- Preserve the remaining 285 acres of forest occurring within the 969-acre sector plan boundary.
- Safeguard water quality in the two main tributaries that originate in the Sector Plan area and flow to the Little Seneca Creek, and into the Reservoir, the region's back-up drinking water supply.
- Avoid the construction of new roadways through forests, parks, streams, stream valleys, and wetlands
- Preserve additional land through parkland dedication and conservation easements.
- Limit development on the COMSAT property to the existing open spaces and the building footprint (should it be demolished).
- Enhance safeguards to achieve the goal of the Special Protection Area – “to protect and maintain high-quality of sensitive water resources.” The Clarksburg sector plan is located within the Clarksburg Special Protection Area.

WEAKENED ENVIRONMENTAL PROTECTIONS IN THE PLANNING BOARD DRAFT

FoTMC has participated in all phases of the development of the CGSP since the kickoff in July 2023. Throughout the process, we have shared our concerns and recommendations with staff. The culmination of this 2-year process was the September 2025 Draft Clarksburg Gateway Sector Plan to the Planning Board. While there certainly were aspects of the Public Hearing Draft that we did not agree with, the current version of the Plan (i.e., the Planning Board Draft) that was sent to the Council in December 2025 reflected Planning Board comments that critically worsened the Plan's environmental protections for streams, wetlands, forests, and consequently, Little Seneca Reservoir. The weakened environmental changes that were made because of the Planning Board's comments include: (1) putting the I-270 Interchange back into the Plan (p.45), (2) discounting the importance of conserving Priority Urban Forests (p.68, 71) and (3) eliminating the 200-foot building setback from I-270.

We discuss these key concerns, and others, in the remainder of the testimony.

3 KEY CHANGES IN THE PLANNING BOARD DRAFT THAT WORSENE ENVIRONMENTAL IMPACTS

I-270 INTERCHANGE ADDED BACK INTO PLAN

Originally the Staff's Public Hearing Draft recommended removing the I-270 Interchange from the Sector Plan based on minimal travel time saved and severe environmental impacts. The I-270 Interchange is the most environmentally damaging alternative for access to the sector plan due to its destructive impacts to forests, wetlands, and streams. Also, an I-270 Interchange is not in keeping with the vision of compact and walkable communities, nor is it needed as two interchange access points, to the north and south, already provide this access. However, because of the Planning Board's comments, the Planning Board Draft now calls for establishing "a new interchange with I-270 at Little Seneca Parkway Extended." (p.45)

Recommendation: Remove the I-270 Interchange from the plan

PRIORITY URBAN FORESTS ARE NO LONGER PRIORITIZED FOR PROTECTION

The State of Maryland has designated nearly all of the forests in this plan area as **Priority Urban Forests**. Maryland DNR defines **Priority Urban Forests** as those "forests in urban areas that are most important for providing wildlife habitat or mitigating flooding, high temperatures, or air pollution."¹ The State considers these forests a **priority for retention and protection**. This designation prioritizes forest and tree retention over disturbance or removal and provides the foundation to choose alternatives that cause the least damage to the environment. The July 2025 Public Hearing Draft concurred with this designation and recommended "maximizing the retention of Priority Urban Forest areas" (p.67). But the December 2025 Planning Board Draft eviscerated the preservation of Priority Urban Forests with the language, "where practicable and consistent with envisioned development in the Plan Area, and consistent with applicable regulatory guidance." (p.71)

The following **Priority Urban Forests** areas are of particular concern:

- **The four largest forested areas on the COMSAT property:** (1) the forest at the northern property boundary, which abuts 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 forest 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.

Recommendation: Preserve the state-designated Priority Urban Forest areas throughout the sector plan, and particularly on the 200-acre COMSAT property where development pressure is greatest.

200-FOOT BUILDING SETBACK REMOVED

The original Public Hearing Draft contained the following language: "Maintain a minimum 200-foot building setback from the I-270 right-of-way for all residential uses to minimize noise and air pollution impacts on residents from the highway." This language was entirely removed from the Planning Board Draft and not replaced with anything. However, numerous studies show harmful effects of air pollution at even greater distances.

Recommendation:

Put the 200-foot building setback back into the Plan to help minimize noise and air pollution impacts on residents from the highway, while continuing to retain the requirement for a native tree buffer at least 50 feet in width between new development and I-270.

ADDITIONAL ROAD-BUILDING AND DEVELOPMENT CONCERNS IN THE PLANNING BOARD DRAFT

GATEWAY CENTER DRIVE EXTENDED

The existing Comsat Drive provides north-south connectivity that can serve as a neighborhood connector for any development on the COMSAT property. However, the Draft Plan does not intend to use the existing Comsat Drive roads

¹ [State of Maryland 2024 FCA Technical Manual v.4.2, Appendix B – 6](#) (pdf p. 99)

for the southward extension of Gateway Center drive. Instead, the Plan indicates a new road to be built east of the COMSAT building, which would intrude into and damage the tree-covered area.

Recommendation: To provide connectivity from the southern terminus of Gateway Center Drive at Shawnee Lane, heading south to West Old Baltimore Road, choose the least environmentally damaging alternative – use Comsat Drive’s existing north-south roads on the COMSAT campus. If a **new** road must be built on this alignment, avoid the taking of trees and forest cover by utilizing the open areas to the maximum extent possible.

WESTWARD EXTENSION OF LITTLE SENECA PARKWAY

We agree with Planning Staff’s earlier choice to eliminate the I-270 interchange from the plans, as explained on p. 2 above. However, the Little Seneca Parkway extension that the Draft Plan recommends for achieving east-west connectivity, even without an interchange, would also severely impact the streams, wetlands, and forests as it crosses the Cool Brook Tributary and the Unnamed Tributary along I-270. West Old Baltimore Road already serves 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 cyclists, and it can be further widened.

Recommendation: Rather than building additional roadways that devastate the remaining natural areas, utilize the existing East-West transportation infrastructure that West Old Baltimore Rd already provides.

OBSERVATION DRIVE

The Planning Board Draft plan to extend Observation Drive north to connect with Gateway Center Drive would have severe and permanently damaging environmental impacts. The northward extension of Observation Drive would fragment and destroy upland forests, cross floodplains, traverse wetlands and steep slopes, and sever both the Little Seneca and North Germantown Greenway stream valley parks. All of this devastation would seriously degrade the mainstream of Little Seneca Creek as it flows to Little Seneca Reservoir. In addition, the plan shows this northward extension cutting through the forest abutting I-270 on the Linthicum property rather than traversing the open field, which is the existing Master Plan alignment and is a far less destructive route. Furthermore, the money is not likely to be available given the costliness of the bridge and road construction.

Recommendation: Eliminate consideration of the northward extension of Observation Drive south of West Old Baltimore Road due to the extreme environmental impacts to the forests, streams, and, ultimately, to Little Seneca Lake Reservoir. Follow the primary guiding principle in formulating this Master Plan – **Avoid Forest Impacts**.

HISTORIC COMSAT BUILDING

The Planning Board Draft does not recommend preservation of the COMSAT building. Consequently, the 34-acre environmental setting, as well as a large percentage of the rest of the COMSAT property, are likely to be developed. Spatially extensive redevelopment of this site would entail considerable additional impervious cover and the loss of Priority Urban Forests, as well as the loss of 50 to 75-year old tree-covered landscape. **We urge you to prioritize the preservation of the four Priority Urban Forest areas in this part of the sector plan.** (See earlier discussion, p.2, 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, further undermining stream health and water quality. There is sufficient open space on this property such that any development plans (roads, houses, etc) can avoid impacting the COMSAT forest groves.

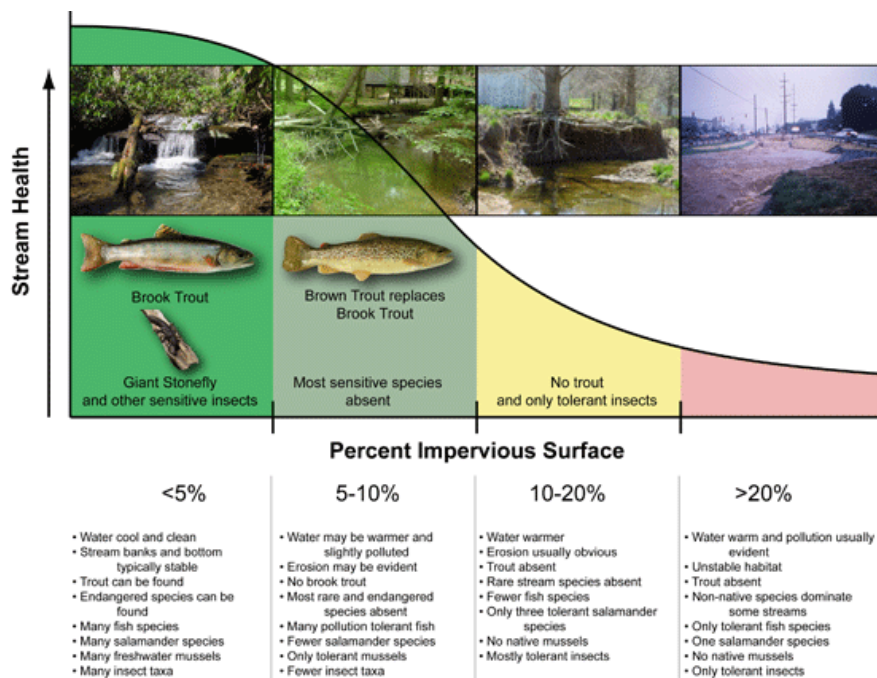
Regardless of whether the COMSAT building is preserved, we do not support turning the COMSAT Property into a regional destination hub with an excessive amount of housing, retail, dining and additional roads. Such extensive development would destroy forests, substantially increase impervious surface cover in the Clarksburg SPA, in which the sector plan is located, 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 the Plan’s vision of a compact community, not a regional hub. Scaling back will also contribute to reducing congestion on the roads.

Recommendation: 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 at the extent that it can be supported with existing roads into and out of the Sector Plan area. In addition, prioritize preservation of the four Urban Priority Forest areas in this part of the sector plan.

WATER PROTECTION, IMPERVIOUSNESS, AND THE CLARKSBURG SPECIAL PROTECTION AREA

Scientific evidence has established the 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](#)”)



Impervious surfaces had already covered 21% of the Plan area according to the staff's 'Existing Conditions' presentation to the Planning Board on November 30, 2023.

The *Countywide Stream Protection Strategy* shows that, pre-development (1994-1998), the streams in the Clarksburg Special Protection Area were rated 'good' and 'excellent' (the Clarksburg Sector Plan is located within the Special Protection Area). However, despite the best intentions of the 1994 Clarksburg Plan and the SPA, stream health ratings have since declined due to intensive development within the Clarksburg SPA. **Now, none of the streams are rated excellent. They have all deteriorated and are listed at 'good,' 'fair,' and 'poor' condition.**

More development in the watershed means more impervious surface area, which means more polluted urban runoff into the streams, larger volumes and rates of stormwater runoff, increased streambank erosion, and more sediment and pollution released into Little Seneca Reservoir. That degradation includes the damaging impact on stream ecosystem health due to increases in water temperature, which compromises the health of sensitive aquatic species – fish, amphibians, macroinvertebrates – and leads to a decline in the type, richness, and the diversity of species present.

Given the decline in the health condition of the streams in the Clarksburg SPA since 1998, it is apparent that the Clarksburg SPA has failed to protect the health of the streams. If the County is to salvage the Special Protection Area goal, which is "to protect and maintain high-quality of sensitive water resources," expanded buffers are imperative to protect the forests which, in turn, protect sensitive water resources. 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).

Recommendation: (1) Expand stream buffers, beyond what the SPA requires, along all waterways in the Clarksburg Sector plan area, which lies within the Clarksburg SPA. (2) Preserve the state-designated Priority Urban Forest areas. (3) Limit development to open areas on the COMSAT and Linthicum properties.

CONCLUSION

The best way to protect streams and water quality is to preserve forests, limit the extent of development, and utilize existing roads.

We urge you to carry out the goals and objectives as laid out for the Clarksburg SPA, which are to **protect water quality, stream valleys, conserve forests, and promote biological diversity**. These environmental protections are critical to safeguarding water quality, improving air quality, combatting climate extremes, fostering native biodiversity, and improving human health and the quality of life for all.

Thank you for considering our recommendations.

Respectfully submitted,

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