

From: [Celeste Torio](#)
To: [MCP-Chair](#)
Subject: Testimony on the Clarksburg Gateway Sector Plan
Date: Monday, September 8, 2025 3:50:10 PM

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Dear Chair Harris,

My name is Celeste Torio, and I am a resident of Clarksburg living in the Clarksburg Square area. I appreciate the opportunity to provide testimony on the Clarksburg Gateway Sector Plan Update. While I support thoughtful growth for our community, I have serious concerns about the proposed zoning and housing changes and their potential impacts.

First, shifting large areas from employment-focused zoning to commercial-residential (CR/CRT) raises questions about balance. Clarksburg already struggles with traffic congestion, limited infrastructure, and overcrowded schools. Allowing higher-density residential development without guaranteed transportation and school capacity improvements could worsen these problems and reduce quality of life for current residents.

Second, while I support the goal of affordable housing, the plan's blanket requirement for 15% MPDUs and incentives for larger family units could lead to significantly denser projects than our infrastructure can handle. These changes may also affect property values in existing communities, especially townhome neighborhoods like mine, by introducing large-scale developments that alter the character of our area.

Third, redevelopment of the COMSAT site as a mixed-use activity center deserves careful scrutiny. If the zoning changes create unchecked residential growth, we risk creating another overbuilt corridor without the transit, road capacity, or green space protections needed to support it.

I urge the Planning Board to:

- Tie any new residential zoning to firm commitments for infrastructure, including road upgrades, public transit expansion, and school capacity.
- Limit the scale of high-density housing near established neighborhoods to prevent incompatibility and property devaluation.
- Ensure that environmental protections and open space preservation are not compromised by zoning flexibility.

Clarksburg deserves growth that enhances our community, not one that overwhelms it. I respectfully ask you to revisit the zoning and housing recommendations to ensure they truly reflect the long-term sustainability and livability of our community.

Thank you for your consideration.

Sincerely,

Celeste Torio, PhD, MPH

September 18, 2024

Jason Sartori, Planning Director
Montgomery County Planning Department
2425 Reedie Drive, Floor 14
Wheaton, MD 20902

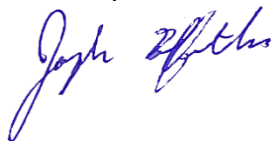
Re: Public Hearing Draft Clarksburg Gateway Sector Plan
Amendment to Thrive 2050

Dear Director Sartori:

The Maryland Department of Planning (MDP) received the above referenced public hearing Draft Plan as part of the distribution in an email dated August 28, 2025, from Clark Larson (on your behalf) to Secretary Rebecca L. Flora. MDP recognizes the significant and thoughtful effort that Montgomery County Planning Department, the Montgomery County Planning Board, and stakeholders applied to the development of the Draft Plan. We understand that a public hearing is scheduled for September 25, 2025.

MDP sent this Draft Plan to the Maryland Department of Transportation. Attached is their analysis as well as our check list of the elements required under the Land Use Article for your use as a self assessment integrated into our analysis of the Draft Plan.

Sincerely,



Joe Griffiths, AICP
Director, Planning Best Practices

cc: Marin Hill, Montgomery County Planning Department
Clark Larson, Montgomery County Planning Department
Susan Llareus, Planning Supervisor, Maryland Department of Planning



Maryland Department of Planning
Public Hearing Draft Clarksburg Gateway Sector Plan
Amendment to Thrive Montgomery County 2050
September 2025

The Maryland Department of Planning (MDP) offers the following as suggestions to improve the Draft Plan and better address the statutory requirements of the Land Use Article. The Maryland Department of Transportation, as noted below, has contributed comments.

2025 Legislation Impacting Local Planning

MDP identified the following bills, adopted by the General Assembly during the 2025 session, that may impact local planning, implementation, and reporting. MDP cannot determine at this time how they may impact your jurisdiction. In partnership with other state agencies, MDP is analyzing the bills and will be developing guidance. Other bills have been noted in reference to the required elements of the plan

Local Land Use Reporting

- [HB 1193](#) - Maryland Housing Data Transparency Act

Energy

- [SB 931/HB 1036](#) - Renewable Energy Certainty Act
Natural Resources and Comp Plans, effective July 1, 2025

Housing

- [HB 1466/SB 891](#) Accessory Dwelling Units - Requirements and Prohibitions, effective October 1, 2025

Plan Analysis

MDP commends Montgomery County Department of Planning for effectively incorporating the new Sustainable Growth Planning Principles, adopted by the General Assembly with 2025's HB 286, signed by Governor Moore into law on April 8, 2026, and effective October 1, 2025. The Draft Plan addresses the 8 Planning Principles. MDP intends to share this draft as an example with other jurisdictions desiring to similarly address these new planning principles.

Maryland's Land Use Article Sections 1-406(a) and (b) require the inclusion of certain elements within the general plan. The following checklist provides for each required plan elements for a Charter County and the Maryland Code reference. This check list is intended to help the county determine consistency with the Land Use Article.

Checklist of Maryland Code (Land Use Article)-Charter County Division I, Title 1, Subtitle 4 Required Elements Division II, Section 21-104(a) Required elements.		
State Comprehensive Plan Requirements	MD Code Reference and Additional MD Code Reference	
(1) The planning commission for a charter county shall include in the comprehensive or general plan the visions under § 1-201 of this title and the following elements:	L.U. § 1-406 (a)	
(i) a development regulations element	L.U. § 1-406 (a) (1) (i) L.U. § 1-407 -- Development Regulations Element	
(ii) a housing element	L.U. § 1-406 (a) (1) (ii) L.U. § 1-407.1 -- Housing Element	
(iii) a sensitive areas element	L.U. § 1-406 (a) (1) (iii) L.U. § 1-408 -- Sensitive Areas Element	
(iv) a transportation element	L.U. § 1-406 (a) (1) (iv) L.U. § 1-409 -- Transportation Element	
(v) a water resources element	L.U. § 1-406 (a) (1) (v) L.U. § 1-410 -- Water Resources Element	
(2) a mineral resources element, IF current geological information is available	L.U. § 1-406 (a) (2) L.U. § 1-411 -- Mineral Resources Element	
(b) A comprehensive plan for a charter county MAY include a priority preservation area (PPA) element	L.U. § 1-406 (b) For PPA Requirements, see § 2-518 of the Agriculture Article	
(4) Visions -- A county SHALL through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201*	L.U. § 1-414 L.U. § 1-201 -- Visions	
(5) Growth Tiers -- If a county has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the county's comprehensive plan	L.U. § 1-509	

*SB266, Local Comprehensive Planning and State Economic Growth, Resource Protection, and Planning Policy - Planning Principles passed with an effective date of October 1st, 2025. This bill overhauls the State's Economic Growth, Resource Protection, and Planning Policy (Policy) by consolidating the Policy's 12 Visions into 8 Planning Principles that will guide and inform state and local planning practices. The new Planning Principles are Land, Transportation, Housing, Economy, Equity, Resilience, Place, and Ecology, and collectively they are intended to foster a high quality of life for all residents by creating sustainable communities and protecting the environment. As noted above, MDP is please to see that this Draft Plan includes a discussion of the new 8 Planning Principles.

Conformance with Section 3-102 of the Land Use Article

The following analyzes how the Draft Plan meets the requirements of municipal comprehensive plan elements, in accordance with the Land Use Article.

1. Development Regulations Element – Synopsis

The element is required to include the planning commission's recommendations for land development regulations to implement the plan. Regulations are required to be flexible to promote innovative and cost saving site design, protect the environment and identify areas of growth. The areas identified for growth are required to encourage flexible regulations, which should further promote economic development using innovative techniques, streamlining the review of applications, including permit review and subdivision processing.

Plan Analysis

HB538, Housing Expansion and Affordability Act passed in 2024 with an effective date of January 1, 2025. The Maryland Department of Housing and Community Development drafted [Frequently Asked Questions](#) to help local governments understand and implement the Act. This state mandate may override local zoning density for multifamily, and unit types where single-family detached dwellings are permitted, in certain circumstances and only for qualified projects.

Housing Element - Synopsis

The housing element is required to address the need for housing within the jurisdiction that is affordable to low-income and workforce households. The housing element is also required to assess fair housing and ensure that a jurisdiction is affirmatively furthering fair housing through its housing and urban development programs.

Plan Analysis

MDP reminds Montgomery County about [HB 1466's](#) requirement that all jurisdictions adopt a local law meeting accessory dwelling unit provisions by October 1, 2026. MDP is aware of the county's ADU legislation but has not analyzed the current local ADU legislation to determine if it is consistent with HB 1466. MDP suggests that the planning department complete such an analysis.

Sensitive Areas Element – Synopsis

The sensitive areas element is required to include the goals, objectives, principles, policies, and standards designed to protect sensitive areas from the adverse effects of development (more recently referred to as climate change impacts). The Land Use Article also assigns sensitive areas element data

provision and review responsibilities to the Maryland Departments of the Environment (MDE) and Natural Resources (DNR).

Plan Analysis

MDP notes that there may be an opportunity to address this new legislation: [HB 731](#) - Wildlife - Protections and Highway Crossings, effective July 1, 2025.

Transportation Element - Synopsis

The transportation element is required to reasonably project into the future the most appropriate and desirable location, character, and extent of transportation facilities to move individuals and goods, provide for bicycle and pedestrian access and travelways, and estimate the use of proposed improvements.

Plan Analysis

MDP is pleased to note that Montgomery County plans to create “a more complete, connected, and sustainable” community (page 19) for the Clarksburg Gateway Sector Plan Area. The Draft Plan supports a complete, connected, and sustainable land use pattern, prioritizing “higher-capacity transit services over single-occupancy vehicle infrastructure” (page 34) and including a planned Complete Streets network, which will promote alternative transportation, e.g., taking transit, walking, biking, and rolling, to travel by single-occupancy vehicle. These policies are consistent with the Maryland Transportation Planning Principle.

With the proposed land use and zoning changes to the area east of I-270, from employment/office/industrial oriented uses to mixed commercial and residential uses, the county recommends removing a formally planned interchange with I-270 and replacing it with an east-west Little Seneca Parkway over I-270 to help form a connected local roadway network. MDP supports this recommendation. We recognize that this aligns with the sector plan’s vision and the transportation goals, as discussed above.

MDP provides the following suggestions relating to the Draft Plan

- If feasible, it would be helpful to provide a map to illustrate the proposed public transportation recommendations (pages 37 and 38) if feasible.
- The Draft Plan promotes “safe routes to school” and includes recommendations for improving pedestrian and bicycle crossing at several intersections near Rocky Hill Middle School and Clarksburg High School. MDP staff suggests the county consider the following to further enhance walking and biking to schools
 - Include an additional illustrative map (see page 49) that depicts a potential publicly accessible trail(s)/connection(s) to Rocky Hill Middle School and Clarksburg High School from the area west of the schools.

- o Consider improving the existing pedestrian and bicycle facilities connecting to the high and middle schools along Frederick Road, since Figure 9 (page 36) shows either “Undesirable” or “Uncomfortable” for the pedestrian level of comfort on the segment of Frederick Road.

Water Resources Element – Synopsis

The water resource element is required to consider available data provided by the Maryland Department of the Environment (MDE) to identify drinking water that will be adequate for the needs of existing and future development proposed in the plan, as well as suitable receiving waters and land areas to meet stormwater management and wastewater treatment and disposal needs. MDE and MDP are available to provide technical assistance to prepare the water resources element, ensuring consistency with MDE programs and goals. MDE and MDP jointly developed WRE guidance to demonstrate how local governments can ensure compliance with the WRE requirements. Local jurisdictions are expected to implement the most important aspects of the [MDE/MDP WRE guidance](#).

Plan Analysis

The County Council approved the [Water Resources Plan](#) (WRP) in July 2010, which was adopted by the full Commission in September 2010, and states the following:

“The Plan provides information on County water and sewer service capacity in light of planned growth to 2030, summarizes an estimate of nutrient loadings on watersheds for existing and future conditions, and identifies the policies and recommendations to amend the General Plan that are needed to maintain adequate drinking water supply and wastewater treatment capacity to 2030, and meet water quality regulatory requirements as the County continues to grow. It is meant to satisfy the requirements of House Bill 1141.” (Abstract of the Approved and Adopted Water Resources Functional Plan)

This suggests that an amendment to the general plan would address policies and recommendations relating to maintaining an adequate drinking water supply and wastewater treatment capacity to 2030, continuing to meet the needs of the county. Thrive did not include the policies suggested in the 2010 WRP but instead adopted it by reference. The WRP used pre-2010 data to examine Montgomery County’s land use, growth, and stormwater management capabilities, as related to adequate drinking water supplies, wastewater treatment capacity, water quality regulatory requirements, and inter-jurisdictional commitments. As redevelopment occurs, the increases in density proposed in this Draft Plan, and in other master plans, will likely impact the waters of the state and existing water, sewer and stormwater infrastructure capacities.

The Montgomery County Department of Environmental Protection (DEP) should review the WRP and determine if it accounts for the Draft Plan’s revised development capacities. This analysis should consider stormwater infrastructure, water and sewer capacity analysis, and finally, upgrading old systems that may be failing or improperly sized for increased development. MDP encourages updating the WRP since it impacts all master plans and the Montgomery County Ten-Year Comprehensive Water Supply and Sewerage Systems Plan.

**Maryland Department of Planning Review Comments
Draft Plan**

STATE AGENCY COMMENTS

The following are state agency comments in support of MDP's review of the draft plan. Comments not included here may be submitted under separate cover, or via the State Clearinghouse. If comments from other agencies are received by MDP, the department will forward them to [Name of jurisdiction] as soon as possible.

Attachments

Page #7: Maryland Department of Transportation

September 17, 2025

Ms. Susan Llareus
c/o Rita Pritchett
Maryland Department of Planning
120 E. Baltimore Street, Suite 2000
Baltimore MD 21202

Dear Ms. Llareus:

Thank you for coordinating the State of Maryland's comments on the 2025 Clarksburg Gateway Sector Plan (the Plan) in Montgomery County, Maryland. The Maryland Department of Transportation (MDOT) offers the following comments on the Plan for consistency with the State of Maryland and MDOT's goals and objectives:

General Comments

- In general, the Plan is consistent with MDOT plans and programs. The MDOT supports the goals of the Plan, including the vision of a multi-modal transportation future for Clarksburg that is characterized by safe streets and human-centered design that serves a Complete and Compact Community and supports environmentally responsible growth.
- Shifting transportation mode choice towards transit and active transportation, shortening automobile trips, and increasing carpooling and vanpooling, are critical components to building efficient, equitable, and sustainable places, and is also essential to accommodating Maryland's changing demographic composition. The MDOT manages several active transportation programs:
 - Transportation Alternatives (TA) Program: a reimbursable, federally funded program for local sponsors to complete community projects designed to strengthen the intermodal transportation system. The program provides funding for projects that enhance the cultural, aesthetic, historic, and intermodal transportation system. The program can assist with projects that create bicycle and pedestrian facilities, restore historic transportation buildings, convert abandoned railway corridors to pedestrian trails, mitigate highway runoff, and other transportation-related enhancements. Project sponsors are required to provide a minimum 20 percent of the total project as a match.

- Recreational Trails Program: a federally funded program that the State Highway Administration (SHA) administers on a reimbursement basis. Like the TA Program, the Recreational Trails Program may reimburse a local project sponsor up to 80 percent of the project's total eligible costs to develop community-based, motorized, and non-motorized recreational trail projects.
- The MDOT's Kim Lamphier Bikeways Network Program: a program that allocates State transportation funds administered by the MDOT Secretary's Office to promote biking as an alternative transportation mode.
- For more information on MDOT's active transportation planning and programming efforts, please see our Maryland's Bicycle and Pedestrian Plans and Programs web page:
<https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=24>.
- Commuter Choice Maryland is MDOT's Travel Demand Management (TDM) program, and it could be incorporated into the Plan as a strategy to support the Plan. The program offers an extensive menu of commuter transportation services, such as ridesharing and incentives. Please visit the Commuter Choice Maryland web site at <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=29> for more information.
- The MDOT supports continued improvements to expand and enhance transit options. Please coordinate with the Maryland Transit Administration (MTA) Office of Statewide Planning for any coordination regarding regional transit and the coordination of MDOT supported locally-operated transit services (LOTS). The MTA also supports park and ride (with SHA), demand response services, paratransit, medical services, and senior-center transportation options. For regional transit planning, please contact Mr. Stephen Miller, Chief of Strategic Planning, via email at SMiller6@mdot.maryland.gov or phone at 410-767-3869. For local transit service planning, please contact Mr. Jason Kepple, MTA Regional Planner, via email at Jkepple@mdot.maryland.gov.
- A Transit Oriented Development (TOD) Program was established within MDOT to provide services including identifying potential TOD opportunities and evaluating existing and future needs of public transportation facilities. For TOD related data resources please visit the Transit-Oriented Development in Maryland web page: <https://data-maryland.opendata.arcgis.com/pages/tod>
- Relative to MDOT implementing resilience strategies and initiatives to withstand the impacts of climate change on transportation infrastructure, please review the MDOT SHA Climate Change Vulnerability Viewer online ArcGIS web application map: <https://www.arcgis.com/apps/webappviewer/index.html?id=86b5933d2d3e45ee8b9d8a5f03a7030c>. The map showcases geospatial data products related to climate change and the potential impacts on State transportation infrastructure. The purpose of this application is to support efforts to avert and mitigate potential impacts of sea-level rise that result from global climate change on State roadway and bridge infrastructure. To review other MDOT Climate Change programs and to access this information please visit: <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PageId=169>.

Chapter 2: Plan Vision and Framework

- p. 19-21. Consider bike-ability for both short- and long-term trips in the concept framework plan. Consider walking, biking, and rolling needs on connectors that prioritize travel through the Plan Area.

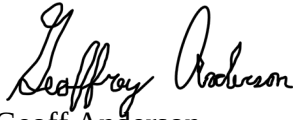
Chapter 3 B: Transportation Comments

- p. 48, 19. The MDOT supports the County's vision to pursue complete streets design that encourages the efficient use of land and transportation resources. Such planning is in line with MDOT's emphasis on improving connectivity, access, and mobility for all users as emphasized by SHA's Context Driven initiative, which focuses transportation practitioners on implementing context-appropriate improvements to emphasize safety, access, and mobility for all users, especially those more vulnerable such as pedestrians and bicyclists.
- Consider incorporating bicycle and pedestrian connectivity to and pedestrian-friendly amenities at local bus stops, in addition to major transit stations.
- Use MDOT's Bicycle Level of Traffic Stress typology to support the Plan's data-driven approach to active transportation improvements and complement the County's Pedestrian Level of Comfort analysis.
- Clarify the County's policy or approach to improving walking conditions on existing roadways. If the County anticipates certain right-of-way needs, MDOT encourages the County to discuss this in the recommendations.
- Consider future context-sensitive countermeasures, particularly at intersections and crossings, to expand on the Plan's typical sections.
- Upon implementation, please share any new sidewalk or shared-use path data with MDOT.
- Consider the ongoing maintenance needs of bicycle and pedestrian facilities throughout the Plan area. Coordinate maintenance needs with the planned MD 355 Bus Rapid Transit (BRT) corridor.
- Continue to prioritize Safe Routes to School (SRTS) engineering improvements to the three schools located in the Plan area in the Plan's implementation and through the County's SRTS program.
- The MDOT recommends coordinating with Luis Gonzalez, Chief of the SHA Active Transportation Division for pedestrian and bicycle accommodations along MD 355 (Frederick Road).

Ms. Susan Llareus
Page Four

Thank you again for the opportunity to review the Plan. If you have any additional questions or concerns, please do not hesitate to contact Ms. Nicole Condol, Transportation Planner, MDOT Office of Planning, Programming, and Project Delivery (OPPPD) at 410-230-6614, or via email at ncondol@mdot.maryland.gov. Ms. Condol will be happy to assist you.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoff Anderson". The signature is fluid and cursive, with the first name "Geoff" and last name "Anderson" clearly distinguishable.

Geoff Anderson
Chief, OPPPD, MDOT

cc: Ms. Nicole Condol, Transportation Planner, OPPPD, MDOT
Mr. Luis Gonzalez, Division Chief, SHA
Mr. Jason Kepple, Regional Planner, MTA
Mr. Stephen Miller, Chief of Strategic Planning, MTA
Ms. Kari Snyder, Regional Planner, OPPPD, MDOT

From: [Shamim, Saif](#)
To: [Harris, Artie](#); [MCP-Chair](#)
Cc: mitra.pedoeem@mncp-pc.org; [Hedrick, James](#); [Bartley, Shawn](#); [Linden, Josh](#); [Sartori, Jason](#); [Kronenberg, Robert](#); [Hartman, Ken](#); [Wellington, Meredith](#); [Iseli, Claire](#); [Tibbitts, Dale](#); [Spielberg, Debbie](#); [Swanson, Tricia](#); [Seltzer, Jeffrey](#); [Conklin, Christopher](#); [Bruton, Scott](#); [Sabbakhan, Rabbiah](#); [Stancliff, Eric](#); [Peckett, Haley](#); [Snapp, Jenny](#); [Olsen Salazar, Kara](#)
Subject: County Executive Comments regarding Clarksburg Gateway Sector Plan
Date: Monday, September 22, 2025 6:25:54 PM
Attachments: [County Executive Comments regarding Clarksburg Gateway Sector Plan.pdf](#)

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Dear Chair Harris,

On behalf of the County Executive, attached please find comments regarding the Clarksburg Gateway Sector Plan. In addition, after the County Executive's memorandum, please find memoranda from various Executive Branch departments.

Thank you,

SAIF SHAMIM

Senior Executive Administrative Aide
Office of the County Executive
Montgomery County, Maryland
240-777-2594
saif.shamim@montgomerycountymd.gov





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 Plan Area, Early 2000s	Percentage of Plan Area, 2020s	Net Change (Result)
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.

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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



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Marc Elrich
County Executive

Christopher R. Conklin
Director

DEPARTMENT OF TRANSPORTATION

M E M O R A N D U M

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.

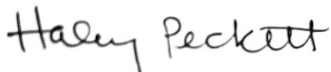
The Plan should recommend that any future interchange configuration support the goals of compact design, urban character, and significantly reduced environmental impact. For instance, the footprint of the interchange should be minimized to avoid impacts to adjacent streams, forest and developable areas. 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	 ID	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 Discovery 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	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. 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. 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.

0	12	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	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.
							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.
10		Policy	ADB	Appx K: p16-17 p24	Master Plan Adequacy Performance Metrics	Worsening Results	Compared to the Baseline all scenarios: - Worsen auto job accessibility - Worsen transit job accessibility - Worsen auto travel times - Worsen transit travel times - Worsen VMT per capita The only metric that appears to improve is NADIMS, which is somewhat moot alongside the increases in VMT. Furthermore, Scenario 1 (the Recommended Scenario) appears to fare the worst of all the scenarios.
11		Policy	CVA	42	Street Classification and Right-of-Way Recommendations	Critical Comment	This implies that this current plan does not meet the transportation adequacy goals established by Council. While curbless 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	 ID	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 RE: #7 "Designate Observation Drive as a Growth Corridor, instead of Frederick Road"
23		Policy	ADB	39	Transportation	Growth Corridor Limits	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? RE: #7 "Designate Observation Drive as a Growth Corridor, instead of Frederick Road"
24		Policy	ADB	39	Transportation	Growth Corridor Classification	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.

0	 ID	Team	Commenter	Page	Section	Summary	Comment
25		Policy	ADB	42 46	Transportation	Commercial Shared Street	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. 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. RE: Cross-Section D, Little Seneca Pkwy Ext
26		Policy	ADB	44	Transportation	Cross-Sections	Consider whether a median is necessary. 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. RE: Cross-Section F, W Old Baltimore Rd
27		Policy	ADB	45	Transportation	Cross-Sections	7' parking lanes are substandard and not acceptable for a master planned facility such as this. Either identify a means of widening to 8', or consider the need for the parking lanes in the first place. RE: Cross-Section G, New Street A
28		Policy	ADB	45	Transportation	Cross-Sections	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. As this is essentially a greenfield site we should not be planning for substandard facilities. RE: Cross-Section A/B, Observation Dr Interim
29		Policy	ADB	47	Transportation	Cross-Sections	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. 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. 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. RE: #20, renaming portions of the old Observation alignment
30	*	Policy	ADB	47	Transportation	Street Names	Consider at some point also, for consistency, renaming Gateway Center Dr to Observation Dr.

0	 ID	Team	Commenter	Page	Section	Summary	Comment
	31	** *	Policy ADB	49-50	Transportation	Additional Trail Connections	Consider extending Roberts Tavern Dr as a trail to Gateway Center Dr (approx 750') 
	32	** *	Policy ADB	49-50	Transportation	Additional Trail Connections	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.  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).

0	 ID	Team	Commenter	Page	Section	Summary	Comment
							Consider extending Wyrns 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.
	33	** *	Policy ADB	49-50	Transportation	Additional Trail Connections	 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.
	34	** *	Policy ADB	49-50	Transportation	Additional Trail Connections	 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) 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.

0	 Team	Commenter	Page	Section	Summary	Comment
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. RE: S4, "All new streets should accommodate on-street parking, where possible"
37		Policy ADB	54	Community Design	On-Street Parking Priority	Consider whether this is intended to affect Complete Streets' Prioritization, which generally assigns Parking (Curb-side 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? RE: K4c, "incorporate landscaping within alleys to help soften their utilitarian purpose"
38		Policy ADB	58	Community Design	Alley Landscaping	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 considered both unsightly as well as rather ineffective at wildlife separation. Also removing a use of "possible"

0	 ID	Team	Commenter	Page	Section	Summary	Comment
44		Policy	ADB	General	General	Possible vs Feasible	Review all uses of the word "possible". The word "possible" implies something that is fiscally unconstrained. Consider replacing with the word "feasible" which more clearly establishes bounds. Some specific examples to consider are: - p57, #54 - "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	How is traffic being distributed without the interchange? What are is heading south toward Observation/Ridge as compared to north toward Clarksburg/Stringtown? 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.
46		Policy	ADB	Appx K, p27-29	Impact of Removing I-270 / Little Seneca Parkway Interchange	Cabin Branch Travel Time Deltas	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. Is it due to the Transportation Analysis Zone being too large & encompassing all of Cabin Branch?
47		Policy	ADB	27, 34, 63, 67	General	Impervious Surfaces	Consider how impervious limits are tallied insofar as planned infrastructure. These limits should not restrict the implementation of master planned infrastructure, noting past difficulties with building new bikeways within the Ten Mile Creek area.
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:#58 - Fix the two reference errors
52		Policy	ADB	73	Parks, Open Spaces, and Recreation	State Highway Assoc	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.

From: [Robins, Steven A.](#)
To: [Harris, Artie](#); [MCP-Chair](#)
Cc: [Pedoeem, Mitra](#); [Linden, Josh](#); [Bartley, Shawn](#); [Hedrick, James](#); [Bob Elliott](#); [Mike Alexander](#); [Casey Blair Anderson \(canderson@rodgers.com\)](#); [gunterberg@rodgers.com](#); [Sartori, Jason](#); [Kronenberg, Robert](#); [Butler, Patrick](#); [Zeigler, Donnell](#); [Larson, Clark](#); [Ballo, Rebecca](#); [marilyn.balcolmbe@montgomerycountymd.gov](#); [Brockmyer, Richard](#); [Christopher R. Conklin \(christopher.conklin@montgomerycountymd.gov\)](#)
Subject: Clarksburg Gateway Sector Plan - Testimony for the September 25, 2025 Public Hearing
Date: Tuesday, September 23, 2025 2:49:01 PM
Attachments: [River Falls Hearing Submission.pdf](#)
Importance: High

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Dear Chair Harris and Members of the Planning Board:

Please find attached a letter from me along with attachments that I would like to submit into the Official Public Record for the Clarksburg Gateway Sector Plan. As you know, the public hearing is scheduled for September 25, 2025. On behalf of the River Falls LLC team (formerly Lantian Development), we greatly appreciate your consideration of our position. Bob Elliott will be testifying at the hearing, and we are likely to submit additional documents into the record (including but not limited to a copy of Mr. Elliott's testimony and the accompanying slide deck) before the record closes, which we have been advised by Staff may be October 3, 2025.

Thank you very much.

Steven Robins

Steven A. Robins, Attorney
Lerch, Early & Brewer, Chtd. rising to every challenge for 75 years
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Attention: This message is sent from a law firm and may contain information that is privileged or confidential. If you received this communication in error, please notify the sender by reply e-mail and delete this message and any attachments. Thank you.
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September 23, 2025

By Electronic Mail

Artie Harris, Chair
and Members of the Montgomery County Planning Board
Maryland-National Capital Park & Planning Commission
2425 Reedie Drive, 14th Floor
Wheaton, Maryland 20902

Re: Clarksburg Gateway Sector Plan – Public Hearing on Working Draft
September 25, 2025, Written Testimony for the Clarksburg Gateway Sector Plan –
River Falls LLC (formerly Lantian Development), Owner of the Comsat Site

Dear Chair Harris and Members of the Planning Board:

On behalf of River Falls Investments LLC, formerly known as Lantian Development LLC (now jointly, “River Falls”), and the current owner of the Comsat Site in Clarksburg, Maryland, we respectfully submit this letter and accompanying materials for inclusion in the official record of the Clarksburg Gateway Sector Plan.

Included in this submission are previously submitted written materials, which remain highly relevant to the Planning Board’s deliberations:

- A. Letter dated July 31, 2025, from Robert Elliott commenting on the Working Draft of the Sector Plan.
- B. Letter dated June 4, 2025, from Robert Elliott addressing the Preliminary Recommendations and briefing before the Planning Board.
- C. Email from Steven A. Robins, counsel for River Falls, dated March 26, 2025, commenting on the Sector Plan’s Emerging Ideas Briefing.
- D. Letter from Steven A. Robins and Elizabeth C. Rogers, counsel for River Falls, dated January 21, 2025, to Karen Burditt, Chair of the Montgomery County Historic Preservation Commission, forwarding written testimony from Robert Elliott, Kathryn Kuranda, Senior Vice President of Goodwin & Associates, and a letter dated January 21, 2025, from CBRE discussing the potential reuse of the property. All these materials relate to the HPC hearing on January 22, 2025, concerning the property. We stand by this testimony and fully support the findings made by Historic Preservation Technical Staff as referenced herein.
- E. Letter dated February 13, 2024, from Steven A. Robins, counsel for River Falls, to Artie Harris, Chair, and Patrick Butler, Chief Upcounty, regarding the County Executive’s FY 25 Capital Budget and FY 25–FY 30 CIP – Transportation Elements.

- F. Letter dated January 30, 2024, from Robert Elliott to Patrick Butler and Christopher Conklin, Director MCDOT regarding the proposed alignment of the Observation Drive Extension and Phase 1 design timing.

River Falls plans to submit copies of Robert Elliott's testimony and the accompanying slide deck he will present at the September 25, 2025, hearing, along with supplemental memoranda, analyses, and other materials before the public record closes, which we have been advised will likely be October 3, 2023.

We thank the Planning Staff for the time and effort they have dedicated over the past few years to meet regularly with our team to discuss the Comsat property and its potential within the Sector Plan. The attention given to this Sector Plan shows how important it is, not only for the Upcounty but also for Montgomery County as a whole, to get it right so the Plan can meet the County's economic development and housing goals.

We especially commend the Historic Preservation Staff for their expertise and for hiring a professional consultant to evaluate the Comsat building, which ultimately led to the decision not to designate it or the property as historic. By removing this obstacle, the Plan can now unlock the property's potential to support the County's economic development and housing goals. However, despite this progress, the current draft of the Plan still does not fully meet the goal of advancing those priorities. We now need to find ways to address the remaining issues, of which there are many, so the Comsat property can fulfill its potential to create jobs, housing, and opportunities for Montgomery County residents.

In our view, the Plan has two main problems: (1) the Comsat site needs direct access to I-270 (via Exit 17) to reach its full potential, and (2) the Staff's proposed requirements result in huge land constraints significantly reducing the available land for development to less than one-quarter of the property. The details are complex, but the key points are clear. Also, without the possibility of the interchange, River Falls will struggle to market the site to major commercial, retail, and life science tenants, and without more land, there will be limited opportunities to meet the desired levels of development and economic growth that the Plan aims for and needs to achieve. The Plan must dial back the amount of land constrained because every acre we lose to these constraints results in housing that does not get built, priority economic development that goes elsewhere, transit riders who forego riding public transportation, and jobs that, once again, are not created.

Collectively, the materials we are submitting emphasize a key and urgent theme: the Clarksburg Gateway Sector Plan offers a unique—and once-in-a-lifetime—opportunity to shape the future of the Comsat property in a way that fully encourages economic development. This rare chance can lead to a plan for transformative mixed-use growth, positioning the site to compete for a Fortune 100 company and promoting regional expansion. If crafted properly, this Plan will help Montgomery County regain a competitive edge with its neighboring jurisdictions.

Instead of seizing the rare opportunity of a 200-acre site under the control of a single owner, the Plan pares down the development acreage to just under 50 acres. This is more than a technical adjustment – it represents a lost opportunity. The Plan stacks overly ambitious environmental, transportation, urban design, and recreational goals on top of each other, leading to a substantial loss

of developable land, from over 200 acres to less than 50 acres, as mentioned earlier. This overly restrictive approach undermines the very economic potential the Plan should promote.

The recommendation to eliminate the long-planned Exit 17 interchange off I-270 presents a major obstacle to achieving the Plan's goals for a "complete community" that can attract retail, jobs, and housing. This interchange is not just about convenience—it is a key element for regional connectivity and economic health. Its removal would limit access, hinder growth, and diminish the strategic importance of the Comsat Site. As Mr. Elliott's testimony states, removing this interchange would be devastating for attracting tenants who can bring jobs and retail to the area. Eliminating the possibility of an interchange would also put unnecessary stress on the local road network, require costly and disruptive intersection widening that could jeopardize Vision Zero goals, and potentially jeopardize the prospects for dedicated bus lanes on Observation Drive.

The issues outlined in this correspondence and Mr. Elliott's testimony are the most critical problems we have identified. Other impactful restrictions are presented as single sentences or brief paragraphs throughout the Draft Plan. Given the time for public testimony, our silence on these points should not be interpreted as agreement with them. We plan to address these in a supplemental filing and/or during the Board's work sessions.

In summary, here are the solutions we endorse for our main points:

1. Do not designate the property historic.
2. Keep Exit 17 as a potential alternative. Do not remove it from the plan.
3. Limit and rationalize excessive land takes and restrictions.
4. Implement the Constellation Parks String of Pearls concept.
5. Create a plan for market-ready development types. Include surface parking and horizontal formats that can succeed and enable a more vertical typology to develop over time.
6. Maintain visibility for jobs and retail while establishing the framework for economic development as a top priority.

We appreciate the opportunity to testify before the Board and would be happy to answer any questions the Board may have during the hearing and in upcoming work sessions. We have invested significant time, effort, and funds into this sector planning effort and welcome the chance to share our work with the Board during its work sessions. We come before the Board with a spirit of unwavering cooperation. Our goal is to seize this generational opportunity and position the Clarksburg Gateway and the property to deliver a transformative project that promotes substantial economic development, expands our much-needed housing stock, and, just as importantly, helps restore Montgomery County's reputation as a highly desirable, dynamic, and vibrant place to live and work.

September 23, 2025

Page 4 of 4

Sincerely,

LERCH, EARLY & BREWER, CHARTERED

Steven A. Robins

By: _____

Steven A. Robins
7600 Wisconsin Avenue, Suite 700
Bethesda, MD 20814
301-657-0747
sarobins@lerchearly.com

cc : Robert Elliott
Mike Alexander
The Honorable Marilyn Balcombe
Jason Sartori
Robert Kronenberg
Christopher Conklin
Patrick Butler
Donnell Ziegler
Clark Larson
Rebeccah Ballo
Richard Brockmyer
Gary Unterberg
Casey Anderson

July 31, 2025

By Electronic Mail

Mr. Artie Harris, Chair
and Members of the Montgomery County Planning Board
Maryland-National Capital Park & Planning Commission
2425 Reedie Drive, 14th Floor
Wheaton, Maryland 20902

Re: *Clarksburg Gateway Sector Plan Working Draft*

Dear Chair Harris and Members of the Planning Board,

I am writing to reiterate our ongoing concerns with the Clarksburg Gateway Master Plan (the "Plan"). The Planning Board is already in receipt of two letters outlining many of these concerns, but the problems with this Plan run much deeper. Lantian's team has provided Staff with detailed feedback and analysis throughout this process, including a detailed redline of the June Planning Board documents, but few of our suggestions made it into the current draft Plan.

Our 204-acre COMSAT property is the centerpiece of the Plan and represents more than 70% of the "developable" land. We acquired COMSAT in 2015, and for 10 years, we have patiently and tirelessly championed the prospects for redevelopment of the COMSAT site to be an economic "game-changer". We appreciate Staff's conclusion that the property should not be designated historic and share their overarching goal of attracting a vibrant mix of residential and commercial uses to the area. However, the Plan, as drafted, is far wide of the mark in its attempt to outline a blueprint for development that is economically viable. The Plan continues to assume development typologies, such as structured parking and tall buildings, that are simply not achievable today. The plan must explicitly acknowledge that development will proceed incrementally, starting with low-rise buildings and surface parking. The street grid, open spaces, and infrastructure can and should be planned in a way that supports a gradual evolution into more vertical alternatives rather than setting unrealistic expectations for rapid transformation without an extended period of transition.

The Plan recommends layer upon layer of excessively ambitious environmental, transportation, urban design, and recreation objectives one atop the other. The net effect of these recommendations results in less than half of the site available for residential or commercial uses. By claiming so much space for other purposes, the Plan places significant constraints on the amount of housing that could otherwise be built on the site and compromises Lantian's ability to establish a dense, mixed-use community that can support high quality transit service.

Further, the draft Plan calls for eliminating the long-planned Exit 17 interchange but would still link the Little Seneca overpass across I-270. We understand that there may be lower density development scenarios that may not necessitate direct interstate access, but removing the possibility of an interchange is tantamount to crippling growth and opportunity in this region. It is a critical mistake to not include Plan language addressing the potential need for direct interstate

access to reduce local road burdens should the development intensity materialize at higher and presumably desired, mixed-use levels approaching the Plan's recommended 1.0 allowable FAR for COMSAT. Separate from road capacity issues, direct interstate access could be a critical site selection criteria impacting our ability to attract a world-class Life Science user (or other major corporate opportunity) to this location.

We feel compelled to point out that Staff is requesting that the Planning Board accept this Working Draft prior to receiving a report analyzing traffic in the area from the County's transportation consultant – a report which may not be released until August 26th. This is but one of three significant reports mentioned but not included in this draft. These reports may well contain information that would have influenced the Plan's recommendations, including the recommendation to remove the interchange. With M-83 removed from the MPOHT (as of Tuesday this week), the completion of Observation Drive will survive as the only planned north-south alternative to the two-lane MD 355 bottleneck through this area of the County. Our own traffic analysis shows that the interchange may be needed to divert traffic that otherwise would overwhelm local roads, requiring additional travel lanes and the widening of intersections. There was strong community support for the interchange, and we believe the Board will hear this at the public hearing.

We have repeatedly raised these and numerous other issues with limited success. While Lantian is committed to working collaboratively with the Staff and the Planning Board to resolve the Plan's many issues, we are strongly opposed to the adoption of a Plan that undermines the greatest economic development opportunity in the Upcounty in a generation. Thank you for your consideration of our concerns.

Sincerely,



Robert J. Elliott, Jr.

cc: Mike Alexander
Marilyn Balcombe
Steven A. Robins, Esq.
Gary Unterberg
Casey Anderson
Will Zeid
Jason Sartori
Robert Kronenberg
Miti Figueredo
Patrick Butler
Donnell Ziegler
Clark Larson
Henry Coppola
Lily Murnen
Rebeccah Ballo
John Liebertz

June 4, 2025

By Electronic Mail

Artie Harris, Chair
and Members of the Montgomery County Planning Board
Maryland-National Capital Park & Planning Commission
2425 Reedie Drive, 14th Floor
Wheaton, Maryland 20902

Re: *Clarksburg Gateway Sector Plan – Preliminary Recommendations Briefing*

Dear Chair Harris and Members of the Planning Board:

I am writing to express what we believe are significant concerns with some of Technical Staff's preliminary recommendations on the Clarksburg Gateway Sector Plan. As the owner of the Comsat property, the largest property in the plan area, we are committed to ensuring this Sector Plan maximizes both our property's potential as well as the County's broader goals for housing, economic development, and public infrastructure. We appreciate the Planning Staff's ongoing efforts and significant progress in addressing some longstanding concerns, but several recommendations threaten to undermine the site's redevelopment potential, significantly constraining our ability to attract major commercial tenants as well as to meet the growing residential needs of the County.

We first want to acknowledge the substantial progress made regarding the site's historic significance. Over the past two decades, both previous ownership and Lantian have consistently expressed concerns regarding the feasibility of preserving the original COMSAT building. After extensive analysis, including two architectural and economic impact studies, Planning Staff concluded that preservation would be prohibitively expensive and a major barrier to redevelopment. We sincerely commend Staff's recommendation against historic designation and their openness to appropriate mitigation.

Unfortunately, Staff continues to advance many concepts that threaten the redevelopment potential of the COMSAT site. As an example, the very same economic impact study that was conducted by HR&A Advisors in September 2024, also concluded that both the low- and medium-density scenarios – each relying on structured and below-grade parking – were economically infeasible. Further, the medium-density scenario confirmed that the value of the private development opportunity decreased as density increased, so much so that it resulted in a \$154 million financing gap - over \$110 million worse than the low-density alternative. HR&A's

study demonstrates that denser, compact development forms that do not allow surface parking are not currently viable at this location. Their analysis aligns with market experience in Gaithersburg, Germantown, and Clarksburg. Developers have not avoided denser projects out of preference, but rather because the economics simply do not support them, and the Sector Plan's Recommendations must be reconciled to address this reality.

The COMSAT property represents perhaps the best Upcounty opportunity to attract major commercial tenants, including life sciences companies, R&D facilities, or corporate headquarters. In addition to the mixed-use vision articulated for the site, the Sector Plan should explicitly recognize and strongly encourage these types of large-scale non-residential developments by providing the flexibility necessary to make them feasible. The Sector Plan recommendations remain fixated on attempting to solve certain development challenges that are unlikely to be fixed, largely due to our property's Upcounty and highway-centric location. Restrictive design prescriptions that ignore market conditions will unintentionally undermine any economic opportunities.

Despite extensive dialogue with Planning Staff over several years, the current Sector Plan recommendations continue to advocate approaches that are unlikely to succeed. Attached is an e-mail from our counsel dated March 26, 2025, detailing similar concerns previously shared with Staff. We remain deeply concerned about several other recommendations, such as:

- **Removal of the Exit 17 Interchange.** It is our understanding that the County's transportation modeling anticipates approximately 500,000 square feet of commercial and retail space at COMSAT. In our opinion, removing the potential for direct I-270 access (Exit 17 interchange) from the Sector Plan is incredibly short-sighted and would seriously impede efforts to attract major commercial and retail tenants to the COMSAT site. Over the last 5 years, we have responded to numerous RFPs, including several from Fortune 100 companies and their brokers. Based on our discussions with prospective high-profile tenants, they request information about how they might have a direct connection to the 120,000 vehicles per day traveling on I-270. Access is essential to their decisions about locating at COMSAT and reliance on Observation Drive from either Exit 16 or Exit 18 is simply unacceptable to them.

In addition, our review of the County's transportation model suggests that COMSAT, alone, would generate approximately 30,000-35,000 external daily vehicle trips, assuming a conservative development scenario of 3 to 3.5 million square feet. If future market conditions were to enable higher-density development approaching 1.0 FAR (as allowed by the Sector Plan), external daily vehicle trips would likely increase to 50,000-60,000. Traffic numbers of this magnitude suggest that the absence of an interchange would thwart the ability to achieve a medium-high density scenario. If we somehow managed to attract the tenants necessary to support more ambitious levels of development without an interchange, the resulting traffic would likely require wider intersections and additional travel lanes on these

arterials – concepts that undermine traditional planning goals for shorter pedestrian crossing times, slower speeds, and street designs for the livable community we hope to create. For these reasons, an interchange option is essential.

The COMSAT site should be explicitly positioned as a strategic "last-stop/first-stop" for Montgomery County along I-270. Given the Sector Plan's recognition of the need for a bridge across I-270, it is critical to maintain the option for future northbound and southbound interchange ramps, if and when, those traffic demands evolve and are needed. Without such a recommendation, COMSAT, as well as the Upcounty, may be excluded as a viable option for the land use mix needed to realize Staff's medium-density development vision.

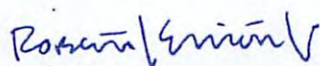
Notably, Christopher Conklin and MCDOT shared our position on the interchange option when we met with them.

- **Overburdening the COMSAT Property with Public Facilities.** Several proposed public facility recommendations are contained in the recommendations that would impose a disproportionate burden on the COMSAT property. In particular, the recommendation for an 8 to 10-acre Clarksburg Gateway Local Park for active recreation entirely on our site is excessively burdensome. We support a more distributed "string of pearls" approach with an integrated series of smaller, connected recreational spaces, but these spaces should be spread out and equitably distributed across other major development parcels throughout the Sector Plan, *pro rata*. Distributing these spaces more equitably allocated across the Sector Plan area would achieve a better result for the public. For example, the M-NCPPC-owned Linthicum East Elementary School site which, to date, has no intentions of being used for a school, could accommodate at least one athletic field, with other private owners also contributing proportionately to recreational amenities. In addition, we also strongly oppose the recommendation for a future regional recreation or aquatic center on the COMSAT property (which would occupy at least several more acres). Since this issue first surfaced, Staff has not provided a clear nexus regarding the size of these significant public facility obligations, nor have they adequately demonstrated why COMSAT alone bears the responsibility to be the panacea for Clarksburg.
- **Observation Drive Redesign.** We support Staff's environmentally sensitive proposal to realign Observation Drive to connect with Gateway Center Drive. However, we recommend coordinated discussions involving all stakeholders - including Staff and MCDOT - to ensure an alignment that preserves the development potential of all impacted properties. Additionally, Observation Drive should be consistent with existing segments to the south, incorporating two travel lanes in each direction. Given anticipated traffic from the COMSAT site, Cabin Branch (via Little Seneca Parkway bridge), Linthicum, other planned developments west of Cabin Branch, and significant north-south through-traffic diverted from MD 355, multiple travel lanes in each direction will be essential for effective traffic management and economic viability.

- **Overly Specific Recommendations at this stage.** Certain recommendations such as the 200' I-270 setback, 50% tree cover for parking or the need for three-bedroom units are just a few examples of items which seem overly specific for recommendations at the Sector Plan level. These should be "goals" that can be changed due to specific design or development proposals that may be received in the future. Incorporation of these recommendations may limit creative ideas or the best design/plan in the future. For example, a 200-foot setback and landscaped buffer is not required nor is it consistent with recent developments along the I-270 corridor (such as near Park Potomac). Setback restrictions hinder commercial visibility and may limit economic development potential. There are numerous uses, including residential development, that can be closer to the highway while in compliance with zoning and the County noise ordinance/mitigation requirements.

We remain committed to working collaboratively toward a Sector Plan that supports ambitious redevelopment of the COMSAT property and advances broader County objectives, but without substantial adjustments, we fear that the full value of the properties in the Sector Plan area will not be realized. We appreciate your consideration of the points raised in the letter.

Sincerely,



Robert J. Elliott, Jr.

cc: Mike Alexander
Steven A. Robins, Esq.
Gary Unterberg
Casey Anderson
Will Zeid
Jason Sartori
Robert Kronenberg
Miti Figueredo
Patrick Butler
Donnell Ziegler
Clark Larson
Henry Coppola
Lily Murnen
Rebecca Ballo
John Liebertz

Bob Elliott

From: Robins, Steven A. <sarobins@lerchearly.com>
Sent: Wednesday, March 26, 2025 12:36 PM
To: Artie Harris; Shawn.Bartley@mncppc-mc.org; Mitra.Pedoeem@mncppc-mc.org; Linden, Josh; Hedrick, James
Cc: clark.larson@montgomeryplanning.org; Butler, Patrick (Patrick.Butler@montgomeryplanning.org); Zeigler, Donnell; Rebecca Ballo (rebeccah.ballo@montgomeryplanning.org); Bob Elliott; Robins, Steven A.; gunterberg@rodgers.com
Subject: Clarksburg Gateway Sector Plan: Emerging Ideas
Importance: High

Dear Chair Harris and Members of the Planning Board:

Our firm represents Lantian Development, the owner and representative of the Comsat property in Clarksburg, Maryland. We thought it would be useful to comment on the Technical Staff's Report entitled, "Clarksburg Gateway Sector Plan Emerging Ideas Briefing." We understand the Board will not be taking testimony at the briefing on March 27th.

Our team has been meeting with Staff to discuss the Comsat property and address its associated issues. Many of the issues are reflected in the briefing document. We are very pleased with Staff's Emerging Ideas; however, several raise concerns. Certain issues need to be nailed down early in the process, in large part because their resolution serves to formulate the basis for recommendations on properties like the Comsat site.

Emerging Idea 14 - Historic Preservation. Certainly, a threshold issue related to the Comsat site is whether the property should be designated historic. For over a decade, Lantian and the prior property owner have maintained that an adaptive reuse of the building was prohibitively expensive and would create a barrier to any development of the property. We are pleased that Staff, including the Historic Preservation Staff, in conjunction with Staff's expert consultants HR&A and Fu Wilmers, also have concluded that the Comsat property should not be designated historic. The property has remained vacant for too long to the detriment of the property owner, the County and Clarksburg, and any historic designation will thwart planning and development efforts for the property. We support the Staff's suggestion to provide a mitigation plan for the removal of the Comsat building that would serve to advance public knowledge about the past and help enhance the preservation of other resources that are designated historic in the area. We urge the Planning Board to support the Staff's Emerging Idea 14.

There are several other Emerging Ideas that we would offer comments on, and they are ordered based on our view of their importance:

Emerging Idea 6 - Exit 17 Interchange. Despite considerable discussion on this issue, Staff is recommending the removal from the Master Plan of Highways and Transitways of the unbuilt highway interchange on I-270 (known as Exit 17) between Exit 16 - Ridge Road and Exit 18 - Clarksburg Road. This interchange is part of the existing 1994 Clarksburg Master Plan. Instead, Staff recommends that a bridge be constructed over I-270 at this location with the future completion of Little Seneca Parkway. This

interchange is very important for the Comsat property and the county to attract retail opportunities, life science, and other campus-type uses, as well as other highly desirable opportunities for Clarksburg and the county. The interchange also appears to be important to the Clarksburg community, given the comments that were received by Staff at their most recent listening sessions in January 2025. In our opinion, removing this interchange from the Sector Plan will eliminate any potential for it to happen. Leaving this recommendation in the Sector Plan ensures that the interchange can happen if the funding becomes available. Leaving the interchange recommendation in place also does not prohibit the bridge's construction before the construction of an interchange. Lantian supports setting aside land to accommodate the interchange on their property. We already have worked on a diamond configuration that aligns more with how interchanges like this one are designed (instead of a cloverleaf). We would note that we recently met with Chris Conklin and his Staff at DOT, and they also appeared to support leaving the interchange recommendation in the plan - not removing it.

Emerging Idea 2e - Major Public Facility. This idea suggests that a major public facility should be considered for the Comsat property, such as a community recreation center, public school, or public park. Any recommendation of this magnitude must consider the nexus between what is being requested and the magnitude of the development on the property. We are confident that development on the Comsat property alone would not generate the nexus for any of the major public facilities suggested by Staff. Thus, there appears to be a potential disproportionate burden on the Comsat property – we are not aware of other major public facilities suggested for other properties in the planning area at this time (see also the similar comment on Emerging Idea 4). I would note that we have indicated to Staff that we support establishing public parkland as a conservation park along the stream valley as listed by Staff in Emerging Idea 9. A highly desirable park in the conservation area as a public facility could be designed to include trails, workout stations, and other elements that could be enjoyed by the greater Clarksburg community and beyond. Requiring a major public park on the Comsat site (we have been told approximately 10 acres) in addition to the conservation area, which could be designed as a public park, is concerning.

Emerging Idea 4 - Realignment of Observation Drive. We very much support the proposed realignment of Observation Drive on the Comsat property that is recommended to connect with Gateway Center Drive, even though it will reduce the amount of developable acreage - it is environmentally sensitive, which will be a big benefit to the County and Clarksburg and the right thing to do. The area that needs further review is how Observation Drive enters the Comsat property from the south as it crosses W. Old Baltimore Road. Staff recommends realigning that portion of the roadway inconsistent with the prior alignment substantially advanced by DOT several years ago. The old alignment north of W. Old Baltimore Road used to run through a portion of property owned by the Linthicum family. The new alignment pushes a greater portion of Observation Drive at this spot on the Comsat property and results in a loss of developable land compared to the property to the south. We would suggest that Staff take another look at this proposed alignment at this one spot and engage DOT in the discussion. Fairness dictates that road alignment should not disproportionately impact Lantian's property. As an aside, we would note that the realignment of Observation Drive also benefits the County as it avoids property owned by the County that was once impacted by the alignment.

Some of the Emerging Ideas urge roadways within the area to adhere to Complete Streets. The one roadway that we would suggest deviate from Staff's recommendation is Observation Drive. The unbuilt stretch of Observation Drive that will connect with the Germantown portion to the south and the Gateway Center Drive to the north should be designed to match these two connector points with the existing section. This roadway, including two travel lanes in each direction, is feasible and economical.

We also discussed this with DOT in our recent meeting, and all appeared to agree that greater consideration needs to be given to this particular road section.

Emerging Idea 2b. MPDUs. We understand the Planning Board's high priority to increase the amount of housing and affordable housing in the area and support that vision. However, it is important to consider that increasing MPDUs from 12.5% to 15% has an economic cost, particularly when added to the other recommendations (like major public facilities and road alignments discussed above) associated with developing the property.

We thank the Board for considering the points raised in this email. We very much appreciate Staff's hard work, excellent thinking on the plan, and willingness to consider our views, particularly regarding the Comsat property. We look forward to participating in this important process as the plan advances.

Thank you,

Steve Robins

Steven A. Robins, Attorney

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Robins, Steven A.

From: Rogers, Elizabeth C.
Sent: Tuesday, January 21, 2025 9:22 AM
To: Ballo, Rebecca; John.Liebertz@montgomeryplanning.org
Cc: Robins, Steven A.
Subject: Written Testimony for HPC Agenda Item No. I.A
Attachments: Lantian Development - Written Testimony - Comsat (Agenda Item I.A)(6595983.1).pdf

Rebecca and John,

Happy New Year! I hope you both had a nice holiday season.

In advance of Wednesday's HPC meeting on Comsat, please find attached Lantian's written testimony. Please confirm receipt and that we don't need to submit hard copies.

Thanks,
Liz and Steve

Elizabeth C. Rogers, Attorney

Lerch, Early & Brewer, Chtd. *rising to every challenge for over 70 years*

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January 21, 2025

Ms. Karen Burditt, Chair
Montgomery County Historic Preservation Commission
2425 Reddie Drive
Wheaton, MD 20902

Re: Clarksburg Gateway Sector Plan/ Hearing before the Historic Preservation Commission on the Listing to the Master Plan for Historic Preservation/ Comsat Laboratories

Dear Chair Burditt and Members of the Historic Preservation Commission:

Our firm represents Lantian Development and its affiliate 270 Land LLC ("Lantian") on the Clarksburg Gateway Sector Plan. Lantian is the owner of the Comsat Laboratories property located at 22300 Comsat Drive, Clarksburg, Maryland (the "Property"), which is the subject of a historic designation review by the Montgomery County Historic Preservation Commission. We are working with Lantian on this historic preservation issue. We are submitting the following materials in furtherance of Lantian's position objecting to any historic designation for the Property:

1. Written testimony from Robert Elliott, Jr., CEO of Lantian Development.
2. Written testimony from Kathryn Kuranda, Senior Vice President of Goodwin & Associates, Lantian's historic preservation consultant.
3. Letter dated January 21, 2025, from CBRE discussing extensive marketing and design efforts to showcase the potential reuse of the Property.

We request that you place these documents in the official public record for this matter. We will attend the hearing, offer public testimony, and answer any questions members of the Commission may have regarding our position.

Yours truly,



Steven A. Robins



Elizabeth C. Rogers

Exhibit 1

Written Testimony of Robert Elliott, Jr.
Comsat Laboratories
Historic Preservation Commission
January 22, 2025

Good evening. My name is Bob Elliott. I am CEO of Lantian Development, the owner of 270 Land LLC, our affiliate that owns the Comsat property in Clarksburg. Lantian is a privately held real estate investment and development company based in Bethesda. We own approximately 530 acres in the DC Metro area including the 204 acres we own in Clarksburg. We have owned Comsat since 2015 when we acquired it from LCOR, a Mid-Atlantic developer based in Pennsylvania.

We appreciate the opportunity to speak with the Historic Preservation Commission (the "HPC") this evening and that you have allowed for an extended time for remarks by our team. With me here tonight is my colleague from Lantian, Michael Alexander; Steven Robins and Elizabeth Rogers, our counsel from Lerch Early & Brewer; our historic preservation consultants from Goodwin & Associates, Kathryn Kuranda and Kirstin Peeler; and Gary Unterberg, our land planner from Rodgers Consulting. The Comsat building, and its legacy, is extremely complex. Back in 2000, Comsat was acquired by Lockheed Martin and several years later, Lockheed Martin notified LCOR of its intention to cease operations in Clarksburg. In 2005, LCOR's desire to pursue a potential redevelopment for the COMSAT property spurred the topic of potential designation of the building and property. At that time, the HPC recommended designation, but that effort was not successful at the Planning Board.

Comsat subsequently vacated the property in 2007, as expected, and the main building has remained vacant for the past 18 years, or approximately one-third of the building's life. It has not been for a lack of effort on the part of either of the two property owners. From 2005-2015, LCOR pursued many strategies, but nothing became of them. It is our understanding that LCOR had an understanding with the County that if they were to pursue a broader redevelopment of the property, they would address the main building as part of that solution. Unfortunately, any redevelopment of the property, when combined with possible adaptive reuse for the main building, never made economic sense. In 2015, LCOR finally gave up and sold the property to us.

When we first acquired the property, we were ambitious. We had the chutzpah to think that “new blood” might be a catalyst for redevelopment along with a change in thinking about the building and a potential rezoning that could allow for a significant housing component. Even though the existing zoning on the property arguably allows for some housing, and, despite our County’s extreme need for more housing, we were instructed by the Planning Director at that time that the only way we would be allowed to proceed with a large scale plan requiring a rezoning would be if the COMSAT building was preserved in whole or a significant part.¹ Even though we had plenty of land to build around the building, we were told that, in no uncertain terms, we would have to commit to preservation before proceeding with a major redevelopment of the property that required a rezoning and a change in the master plan – despite the fact that the property was not designated historic in any way. As a result, we have not been allowed to pursue redevelopment due to threats of litigation or designation. For almost 10 years, we have tried to identify a user or use that could allow us to proceed with the building in place. These efforts, while significant, have been totally unsuccessful.

It has been punitive to us, but arguably more so to Montgomery County, which has lost out on 20 years of economic benefit in the form of commercial and residential real estate taxes, new residences, jobs, economic growth and the creation of more mixed-use development in the upper part of the County. The lost economic benefit to the County and Region is in the 100s of millions of dollars. We do not support designation for the Comsat building on our property.

Some additional background. While I am an owner and developer, I am also an architect. I have two degrees in Architecture from Rice University. From 1991-1997, I worked alongside Helmut Jahn in Chicago. In 1991, the American Institute of Architects released a list of the ten most influential living American architects at that time. At the time, the AIA ranked Helmut Jahn 9th. Cesar Pelli was 10th.

I left the profession in 1997 to get an MBA in real estate and finance from Wharton. I returned to the DC Metro area in 2002 to join the development team at JBG (now JBG

¹ Comsat’s zoning remains EOF 0.75. This is a commercial designation mainly for employment office. The zone allows for up to 30% residential. The former Planning Director indicated that the 30% calculation would be based only on what development presently exists on the property rather than the density that could be approved (through a land use application) per the zoning designation. This less favorable interpretation, which would not take into consideration a total redevelopment of the site as a vacant parcel, would severely limit the amount of residential permitted on the property unless the property were rezoned (through a master plan amendment). Under the EOF 0.75 designation, almost 6.6 million square feet of development theoretically could be allocated to the site; however, as Lantian’s efforts to pursue development opportunities played out, it was very clear that the allocation of density on the property was not the issue. Instead, as our testimony points out, it was the overbearing costs to adaptively reuse the Comsat building (and residual negative land value to save the building) and a threat of historic designation that ultimately precluded any economically viable adaptive reuse and/or redevelopment of the property in whole or in part.

Smith) where we had hired Michael Graves to design the US Department of Transportation Headquarters. In 2005, I hired Cesar Pelli to create a new master plan to redevelop I.M Pei's L'Enfant Plaza. Yes, I actually hired and met Cesar Pelli in New Haven. Cesar and his team led a redesigned effort for L'Enfant Plaza that included adding two new office buildings and a residential building along with a planned National Children's Museum. That redesign was accepted by the Commission of Fine Arts but was never realized. Today, the central plaza is home to the Spy Museum, designed by Lord Richard Rogers. Comsat had been headquartered at 950 L'Enfant Plaza until they sold that building in 1986.

I recognize that this was as a lot of "star-architect" big name dropping, but I am doing so because I want the HPC to know that my firm and I have a very deep appreciation for both the architect and architectural history involved in this case. But even with that understanding, we believe the circumstances surrounding COMSAT are different than your traditional case.

Please consider the Purpose Clause contained in Section 24-A-1, The County's Historic Preservation code that clearly articulates the intent and important attributes of the code. The first sentence of the Purpose Clause largely speaks to the identification of architects, sites, and structures. And, for most of tonight's hearing, the emphasis will be placed on the star architect and the building. While the Comsat Building may be a testament to Cesar Pelli, architectural merits alone do not justify historic designation.

In evaluating this matter, I would ask that you also give due consideration to the second sentence of the Purpose statements. (See Attachment A). It reads (and I quote) "Its further purpose is to preserve and enhance the quality of life in the county, safeguard the historical and cultural heritage of the county, strengthen the local economy, stabilize and improve property values in and around such historical areas, foster civic beauty and to preserve continued utilization and pleasure of the citizens of the county, the state, and the United States of America."

Saving the COMSAT building or designating the property does not:

- Enhance the quality of life in the County.
- Strengthen the local economy.
- Stabilize and improve property values.
- Preserve continued utilization and pleasure of the citizens of the County.

Let us start by discussing two of these points "enhancing the quality of life" or preserving continued utilization by citizens." The building's impact on the cultural and social fabric of Montgomery County is negligible. The Comsat Building was a corporate headquarters and was inaccessible to the public. Its functions did not foster community engagement, nor did it contribute to local cultural narratives. Even Staff likely would

agree with that assessment. Unlike other landmarks that serve as gathering spaces or symbols of community identity, the Comsat Building remained a relatively insular entity, serving a very narrow corporate purpose. And as you are aware, Comsat vacated the property 18 years ago. Today, most current residents of Clarksburg have little to no knowledge of COMSAT and why the property remains undeveloped.

Second, keeping the building will “not strengthen the local economy” nor has it “stabilized or improved property values.” In fact, it has done quite the opposite. Our property has laid fallow for almost two decades. We hired the well-respected RCLCO firm to prepare an economic analysis much like the County’s. We found that had Comsat been redeveloped 20 years ago, the County would have been the beneficiary to hundreds of millions of dollars in tax revenues as well as potentially thousands of jobs and new residents. RCLCO also found that there would be a huge negative residual land value, as the County’s expert also concluded.

Since 2015, in order to find a way to adaptively reuse the building, we have hired numerous architecture, engineering and construction (AEC) consultants to evaluate the building. This list includes several different architects, specializing in specific building types as well as urban planning; Mechanical Electrical and Plumbing Engineers that specialize in adaptive reuse and life sciences; Civil and structural engineers; Curtain wall and materials consultants, and General contractors and specialty sub-consultants.

We have spoken to and/or developed conceptual drawing for and/or construction budgets for adaptive use of the main building for:

- Fortune 100 office and life science companies, ranging from single buildings to campus settings;
- A Fortune 10 company with many diverse lines of business;
- National and specialty retailers;
- Market rate and affordable housing developers;
- Religious groups and other institutional users;
- State of Maryland and Federal Government Agencies; and
- MCPS, the County and several of its agencies.

We have spent countless hours and millions of dollars on consultants and their studies, and their drawings, and renderings. We even spent a million dollars on select interior demolition to open up office spaces and higher bay areas in order to show potential life science tenants the flexibility of certain spaces for an adaptive reuse of the building. We have hosted countless tenant tours in the main lobby and through the building. We have taken painstaking efforts to try and adaptively reuse some or all the building. Much of this work was done for specific groups and is protected by confidentiality and disclosure agreements.

Since 2021, we have worked with CBRE and Gensler to develop life science concepts and studies for the main building and the property. We have included a copy of a letter from CBRE that outlines a number of RFPs, the types of tenants and the square footage requirements. The response to Comsat is universal. They love the large tract so close to DC and the Shady Grove life science corridor. However, and I quote:

"Though offering many positive attributes, drawbacks of the site such as existing structures that have been abandoned/dormant for many years, and the possible schedule and budget disruption due historical significance of the existing structures offer significant headwinds for final consideration over other available sites within the region. The potential of political and community opinions to preserve the asset contributes uncertainty in the process that other competing sites within and out of the region do not have.

For projects of significant scale, influence, and profile supporting biomanufacturing and other large scale life science initiatives within Montgomery County, it is our opinion that the site would score much better in comparison against other similar sites in the region if presented as a clean greenfield option. This would necessitate demolition of existing structures to provide a clean and clear path for development."

In our estimation, the gap to save the Comsat building ranges from about \$39-87 million depending on whether you develop housing, hospitality, institutional or life science. We believe a gap like this only grows with time and increasing construction costs.

Beginning in 2023, the County's Planning and Preservation team developed its own independent adaptive reuse concept and economic framework to evaluate the cost implication of redeveloping the COMSAT building as part of this Sector Planning effort. While their concept somewhat differs from ours, the conclusions are the same. They determined that the redevelopment of the COMSAT building creates a burden of at least \$28 million (and most likely more like ours). County Planning and Historic Preservation Staff now agree with what we already knew – there is no "winning solution" to saving Comsat.

While HPC predominantly focuses on the architectural and cultural history, we believe the HPC, particularly in this matter given the lengthy time that the building has sat vacant, also should evaluate and embrace Section 24A-1 of the Code, which emphasizes economic and practical factors as well. Economic realities should be considered including severe financial hardship and financial burden, and lack of a viable use. In this case, preservation will undoubtedly result in hindering economic development for Clarksburg, the County, and the State of Maryland. This is a clear example of where economic growth and impact, as articulated in the purpose clause, should carry the day.

We recognize that the COMSAT building may meet several of the criteria in Section 24A-3 for historical and architectural importance for inclusion in the Master Plan for Historic Preservation, just the Commission found in 2005. However, we strongly believe that reliance on architectural merit alone ignores the Purpose of Chapter 24A-1 of the County code because preservation unquestionably would be detrimental to the local economy and weaken property values. Designation of COMSAT will not enhance the reuse potential of the property. Just the opposite. It has been 20 years since the designation was first considered for COMSAT and that has resulted in no economic growth and has cost Montgomery County hundreds of millions of dollars. Designation would doom the County to another decade or two of stagnation in upper Montgomery County. It is time to move on so that the County can create a Sector Plan that will allow us to develop a best-in-class community that will better serve the County and its residents while providing opportunities for future development and economic growth.

Thank you for your consideration of our position.

Attachment A

The Purpose of Article 24-A-1

“It is the purpose of this chapter to provide for the identification, designation and regulation, for purposes of protection, preservation and continued use and enhancement, of those sites, structures with their appurtenances and environmental settings, and districts of historical, archeological, architectural or cultural value in that portion of the county which is within the Maryland-Washington Regional District. Its further purpose is to preserve and **enhance the quality of life** in the county, safeguard the historical and cultural heritage of the county, **strengthen the local economy, stabilize and improve property values in and around such historical areas**, foster civic beauty and to **preserve continued utilization and pleasure of the citizens of the county**, the state, and the United States of America.”

In the Case of Comsat, Preservation...

- DOES NOT enhance the quality of life
- DOES NOT strengthen the local economy
- DOES NOT stabilize and improve property values
- DOES NOT preserve continued utilization and pleasure of the citizens of the county

Exhibit 2



Testimony

COMSAT Laboratories

Historic Preservation Commission
January 22, 2025

Submitted by Goodwin & Associates

I. Introductions

For the record, my name is Kathryn Kuranda, and I am the Senior Vice President with Goodwin & Associates. We are a Frederick-based cultural resources management firm with expertise in historic preservation that was retained by Lantian Development, the owners of the former COMSAT Laboratories. I am architectural historian with over 30 years of experience in the preservation field and my qualifications exceed those established by the Secretary of the Interior in history and architectural history. (See Attachment A). I would like to thank the commission for this opportunity to submit my testify.

The COMSAT Laboratories is a challenging property. This resource has attracted the interest of preservationists for over twenty years. COMSAT Laboratories, like many purpose-built commercial and industrial buildings from the recent past, presents unique challenges to its continued use and enhancement as envisioned among the purposes for designation under the County's Historic Preservation Ordinance. These rehabilitation challenges differ from earlier historic buildings and relate to COMSAT Laboratories' design, materials, and late 20th century building technologies.

Rehabilitation and reuse of the property has been actively pursued by two owners, both experienced development companies. These efforts have included economic feasibility studies utilizing rehabilitation incentives, numerous reuse design studies, and aggressive marketing. None of these efforts have been successful and the building has been maintained but underutilized since COMSAT discontinued operations in 2007 after its acquisition by Lockheed Martin in 2000. The main building that is the primary focus has been vacant since Comsat departed. Solutions for this property have been sought for over 18 years without success. The Comsat reuse problem was recognized by Montgomery County on a pragmatic level since 2015. The 500,000+ square feet of available office space were dropped from the County's own inventory of available office space, due to its detrimental impact on the entire UpCounty office submarket.

RCGoodwin.com

EAST

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Frederick, MD 21701
301-694-0428

SOUTH CENTRAL

309 Jefferson Hwy.
New Orleans, LA 70121
504-837-1940

CENTRAL

2500 W. 31st St., Ste. B
Lawrence, KS 66047
785-856-0744

NORTHEAST

830 Berlin Tpk.
Berlin, CT 06037
860-299-6328

II. Bespoke Building Design

COMSAT Laboratories is a purpose-built facility, specifically engineered for the design, construction, and testing of first-generation communication satellites. Development of the original building spanned from 1967 to 1969 with two major additions by HOK added in early to mid-1980s. It is an immense industrial building that housed laboratories, manufacturing, testing, administration and personnel support.

The architectural firm of record for COMSAT Laboratories is Daniel, Mann, Johnson & Mendenhall (DMJM), a commercial development firm. At that time, DMJM employed 700 engineers and four architectural designers. Cesar Pelli, who apprenticed for 10 years under architect, Eero Saarinen, was hired by DMJM as their first Director of Design, a role added to improve the firm's design reputation. The Pelli's association with DMJM was brief and extended from 1964 to 1968. To quote Pelli, clients selected DMJM because they "were not much interested in design but had other priorities—low building costs, short schedules, and modest fees".

DMJM became known for glass building skin systems, which reversed window mullions to wrap buildings seamlessly in glass. The reversed mullion concept was an idea credited to architect, Anthony Lumsden, Pelli's former colleague at Saarinen and Associates, who joined him as DMJM's Assistant Director of Design. The glass building skin system had been initially proposed, and later rejected, by Saarinen for the design of the Bell Labs building in Holmdel, New Jersey. Although Pelli is credited with aspects of the COMSAT design while DMJM's Director of Design, Pelli left DMJM over a year before the fast-tracked COMSAT development was completed. Lumsden became Director of Design at DMJM following Pelli's departure and served in that position for 25 years until his retirement.

Comsat was executed early in Pelli's career. He went on to become a prolific master architect and educator known for iconic urban buildings around the world. He is credited with over 300 major buildings during his career. COMSAT Laboratories is not one of Pelli's major works nor is it a notable example of DMJM's glass-skinned building designs. Rather, the building reflects the client's priorities for use, design, low cost and quick construction. The building is organized pragmatically using a central spine with extending wings.

III. Period Materials

Industrial buildings supporting client-specific architectural programs characterized much of the development in the late 20th century. As in the case of COMSAT Laboratories, design, economy, and expedient construction were emphasized. Building longevity and energy efficiency generally not priorities; design flexibility for redesign or repurposing was not considered. These were purpose-built, cost-sensitive, buildings with a single program.

COMSAT Laboratories employs an aluminum frame and anodized aluminum panel skin that is punctuated by portal windows. The wings are separated by long expanses of basic glass, window wall systems. These materials pose conservation challenges from corrosion and finish failure. The original single pane window system encourages condensation and interior moisture penetration. The walkway glazed with single-pane windows further contributes to moisture migration and low energy efficiency. The existing window system would not support retrofitting the building with the thicker and heavier insulated glass panels used in modern curtain wall construction.

The long-term health hazards associated with innovative building materials and industrial processes were unknown in the latter 20th century. COMSAT contains significant amounts of asbestos, which was sprayed on the structural frame, packed on pipes for insulation, used to sealed HVAC systems and in the joint compound for many of the building's interior finishes, including floor and wall tile as well as drywall. Lead-based paint was still used in buildings of this era and limited amounts of hazardous chemicals were used in lab work and in fabrication processes.

The almost 20-year vacancy of the building has resulted in moisture migration and has supported mold. The building does not meet current building codes, or current health and safety requirements. Rehabilitation would require substantial hazard abatement and the replacement of original materials now known to be dangerous. These measures would impact COMSAT's historical integrity of design and materials.

In addition, buildings with low energy efficiency are a source of greenhouse gases contributing to climate change and diminished air quality. These issues recently were addressed on both the state and county levels through Building Energy Performance Standards (or BEPS). COMSAT does not meet either Maryland or Montgomery County's mandated Building Energy Performance Standards. Reuse of the building would require the aggressive removal and replacement of underperforming architectural components and mechanical systems.

Due to the hazardous building materials used during the period, coupled with the building's failing environmental performance applying current BEPS, rehabilitation of the COMSAT Laboratories would necessitate significant design modifications and loss of original materials. Character defining features important to the original design of the building would be lost and the historical integrity would likely be substantially compromised despite considerable investment.

IV. Designation requirements

The county's historic preservation ordinance was adopted to advance specific objectives. Among these are the protection, preservation, continued use and enhancement of significant properties, and strengthening the local economy. While COMSAT Laboratories may meet the county's designation criteria for historical and design significance identified in Section 24A, designation will not meet the purpose clause contained in the ordinance to advance continued building use and enhancement or to strengthen the local economy. If designated, COMSAT Laboratories will remain empty and unutilized due to its size, industry-specific plan, and construction as evidenced by a nearly 20-year history of unsuccessful rehabilitation feasibility studies, targeted reuse design studies, and aggressive marketing.

Designation will not support the over-riding objective of the ordinance. I have reviewed Lantian's past efforts to identify appropriately reuses for the property and their work has been exhaustive. Their results were confirmed by County's adaptive reuse feasibility studies completed by Fu Wilmers and HR&A. For the reasons summarized, I concur with the staff decision to not recommend listing COMSAT Laboratories to the Master Plan for Historic Preservation as part of the Clarksburg Gateway Sector Plan.

As difficult as this may be, we urge the Commission to recommend not pursuing an historic designation for the property. I appreciate the time and effort involved in reaching that recommendation.

Thank you for this opportunity to submit this testimony.

Attachment A



KATHRYN M. KURANDA, M. ARCH.HIST.

**SENIOR VICE PRESIDENT
HISTORICAL & ARCHITECTURAL SVCS.**

EDUCATION

Master of Architectural History, Concentration in Historic Preservation, University of Virginia, Charlottesville, Virginia, 1984

Bachelor of Arts in American Studies, Dickinson College, Carlisle, Pennsylvania, 1977

Facilitation Fundamentals, U.S. Institute for Environmental Conflict Resolution, 2011

Section 106 Advanced Seminar, Advisory Council on Historic Preservation, 2009

Training Course "Professional Development Program in Engineering for Older Buildings, including Heritage Buildings: Materials & Pathologies," Association for Preservation Technology & National Center for Preservation Technology and Training, 2003

Workshop "National Environmental Policy Act," University of Southern Maine, Summer Session Program, 1999

Workshop "Property Transfer Site Assessment Research Methods," Illinois State Museum, Springfield Illinois, 1992

Training Course "Historic Concrete: Investigation and Repair," Association for Preservation Technology, 1989

Training Course "Working With Section 106," Advisory Council on Historic Preservation and The Bureau of Land Management, 1988

London Summer School, The Victorian Society in America, 1980

Training Course "Wood Preservation Technology," Association for Preservation Technology, 1978

Historic Restoration and Preservation Technology Course Work, St. Lawrence College, Ontario, Canada, 1977

PROFESSIONAL ASSOCIATIONS

Member, Association for Preservation Technology; Member, International Council on Monuments and Sites; Member, Vernacular Architectural Forum; Member, Society of Architectural Historians.

PROFESSIONAL EXPERIENCE

Senior Vice President - Architectural & Historical Services, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland, 1995 - Present

Vice President -- Architectural & Historical Services, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland, 1991-1995

Assistant Vice President -- Architectural and Historical Services, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland 1990 - 1991

Senior Project Manager, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland, October 1989 - 1990

Architectural Historian, State of Nevada, Department of Conservation, Division of Historic Preservation and Archeology, State Historic Preservation Office, April 1984 – July 1989

Architectural Historian, Colorado Department of Highways, Project Development Branch, Denver, Colorado, October 1983 – March 1984

Architectural Historian, Community and Preservation Planning Consultants, Concord, New Hampshire, August 1981 – June 1982

Preservation Consultant, Stafford Rockingham Regional Council, Exeter, New Hampshire, June 1980 – August 1981

MANUSCRIPTS, PUBLICATIONS, AND PAPERS PRESENTED

1980a *Franklin Falls Historic District Nomination*. Franklin Falls, New Hampshire.

1980b *Cultural Resources of Rochester, New Hampshire*. Contributor, Survey Planning Report.

1981a *Plymouth Depot National Register Nomination*. Plymouth, New Hampshire.

1981b *Merchants Exchange*. Concord, New Hampshire. (HABS).

1981c *Rogers Garage*. Concord, New Hampshire. (HABS).

1982a *Boston Port Road Historic District Planning Report*. Rye, New York, Preservation planning study for National Register Historic District encompassing three estates on Long Island Sound.

1982b *Barret Hill Farm National Register District Nomination*. Wilton, New Hampshire.

1982c James Steam Mill Apartments, Historic Preservation Tax Certification Project, Newburyport, Massachusetts.

1982d Medical Clinic, Historic Preservation Tax Certification Project, Concord, New Hampshire.

1983a *Trinidad Foundry and Machine Company*. Trinidad, Colorado, (HAER).

- 1983b *Lime Kiln Near Morrison*. Morrison, Colorado (HAER).
- 1983c *Rooney Ranch*. Jefferson County, Colorado (HABS).
- 1984 *Midwest Iron & Steel Company*. Denver, Colorado, (HAER).
- 1985a The Architecture of Las Vegas, Nevada. Presentation sponsored by Nevada Humanities Committee and Nevada State Museum and Historic Society, Las Vegas, Nevada.
- 1985b *Stewart Indian School Historic District Nomination*. Carson City, Nevada.
- 1987a *Multiple Resource Nomination of Buildings Designed by Frederick De Longchamps*. Washoe and Douglas Counties, Nevada.
- 1987b Speaker, "Oasis" Conference sponsored by Nevada Historical Society, Nevada
- 1988a Humanities Committee, Nevada State Council on the Arts, Nevada Division of Historic
- 1988b Images of the Nineteenth-Century Agricultural Landscape, *Nevada Historical Society Quarterly* Vol. XXXI, Winter 1988, No. 4.
- 1989a *Western Vernacular Architecture*. Museum Week lecture series, sponsored by Nevada State Museum and Historical Society, Carson City, Nevada.
- 1989b Preservation Workshop. Nevada State Museum and Historical Society, Las Vegas, Nevada.
- 1989c Walking Tour of Virginia City, Nevada. Sponsored by Historic Preservation Committee, Virginia City, Nevada.
- 1989d *Harmon School National Register Nomination*. Churchill County, Nevada.
- 1989e *Reed House National Register Nomination*. Gardnerville, Nevada.
- 1989f *Architectural Survey of the Planned Royersford Main Post Office, Montgomery County, Pennsylvania* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to the United States Postal Service, Facilities Service Center.
- 1989g *Elm Street School*. Frederick, Maryland (HABS).
- 1990a *Detailed Archeological and Architectural Investigations of the Tabard Village Project Area, Cedar Grove Complex (AA-881), and Archeological Site 18AN594, Anne Arundel County, Maryland* (with Thomas W. Neumann and Michelle T. Moran). Submitted to Classic Community Corporation.
- 1990b *Phase I and II Archeological Investigations of Bachelor's Hope Farm, St. Mary's County, Maryland* (with Martha Williams and Suzanne Sanders). Submitted to Archetype.
- 1990c *Phases I and II Archeological Investigations of the Frederick Municipal Golf Course, Frederick County, Maryland* (with Thomas W. Neumann and Michelle T. Moran). Submitted to City of Frederick, Maryland.

- 1990d *Archeological and Architectural Reconnaissance of the Suitland Federal Center, Prince Georges County, Maryland* (with Christopher R. Polglase, April Fehr, Michelle Therese Moran, and Janet S. Shoemaker). Submitted to Ward/Hall Associates, AIA.
- 1990e *Phase I Archeological Investigation at the Meadows, Baltimore County, Maryland*, (with R. Christopher Goodwin and Suzanne L. Sanders). Submitted to The Macks Group.
- 1990f *Phase I Archeological Investigations of Billingsley Road, U.S. Route 301 to the Charles County Sanitary Landfill No. 2, Waldorf, Maryland*, (with R. Christopher Goodwin and Michelle T. Moran). Submitted to Whitman, Requardt and Associates.
- 1990g *A Study of Secondary Impacts to Historic Resources Resulting from Construction of the Proposed Montgomery County Resource Recovery Facility, Dickerson, Maryland* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to ENSR Consulting and Engineering.
- 1990h *Architectural Survey of the Planned Oakmont Green Développement, Carroll County, Maryland* (with R. Christopher Goodwin, Michelle T. Moran, and Mary Kendall Shipe). Submitted to Oakmont Green Limited Partnership.
- 1991a *Phase I Archeological Survey and Architectural Investigation of the Proposed 7-Mile BG&E Dublin Extension Pipeline, Harford County, Maryland* (with R. Christopher Goodwin, Michelle Moran, Mary K. Shipe, and Martha R. Williams). Submitted to Biohabitats.
- 1991b *Phase I Archeological Survey and Architectural Investigation of the Proposed 24-Mile BG&E Pipeline, Harford County, Maryland* (with R. Christopher Goodwin, Martha R. Williams, Mary K. Shipe, and Peter Morrison). Submitted to Biohabitats.
- 1991c *Architectural Investigations of the Routzahn Home Farm, Frederick County, Maryland* (with R. Christopher Goodwin, Deborah Cannan, and Michelle T. Moran). Submitted to Allegheny Power System.
- 1991d *Historical and Architectural Investigations of the Humphrey Wolfe Farm, Howard County, Maryland* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to Cattail Creek Country Club.
- 1991e *Architectural History Investigations of the Washington National Airport Surveillance Radar Facility, Washington, D.C.* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to Information Systems and Network Corporation.
- 1991f *Architectural Recordation for Three Buildings Maryland Library for the Blind and Physically Handicapped, Baltimore, Maryland*. Submitted to Ayers Saint Gross.
- 1991g *Phase I Archeological Investigations and Architectural Reconnaissance Survey of the BG&E Utility Corridor from Herald Harbor Road to Maryland Route 3, Anne Arundel County, Maryland* (with R. Christopher Goodwin, Christopher R. Polglase, William R. Henry, and Michelle T. Moran). Submitted to Baltimore Gas & Electric Company.
- 1991h *Suitland Federal Center Historic Preservation Compliance Section 110 and 106 Compliance Prince Georges County, Maryland* (with R. Christopher Goodwin, Michelle T. Moran, and Deborah Cannan). Submitted to Ward/Hall Associates AIA.

- 1991i *Combined Phase I and Phase II Archeological Investigations of Centre 9500, Howard County, Maryland* (with R. Christopher Goodwin, Suzanne L. Sanders, and Michelle T. Moran). Submitted to Land Design Engineering, Inc.
- 1991j *Archeological and Architectural Investigations at Camden Yards, Baltimore, Maryland* (with R. Christopher Goodwin, Elizabeth Pena, and Suzanne M. Sanders). Submitted to the Maryland Stadium Authority.
- 1991k *HABS Recordation of Six Buildings Located within the Uptown National Register Historic District, New Orleans, Louisiana* (with Susan Barrett-Smith). Prepared for the United States Postal Service.
- 1991l *Mitigative Measures for Cultural Resources, Wyoming Valley Levee Raising Project* (with Christopher R. Polglase). Submitted to the U.S. Army Corps of Engineers, Baltimore District).
- 1991m *Cultural Resource Reconnaissance and Sensitivity Study for the C & D Canal Feasibility Study, Chesapeake Bay and Delaware River* (with R. Christopher Goodwin, Christopher R. Polglase, Katherine Grandine, Michelle T. Moran, Peter H. Morrison, and Thomas W. Neumann). Submitted to Maryland Port Administration.
- 1992a *Phase I and Phase II Archeological and Architectural Investigations for the Proposed Site of the William H. Natcher Building, National Institutes of Health, Bethesda, Maryland* (with R. Christopher Goodwin and Suzanne L. Sanders). Prepared for AEPA Architects Engineers.
- 1992b *Architectural and Archeological Investigations In and Adjacent to the Bywater Historic District, New Orleans* (with Stephen Hinks, Jack Irion, Ralph Draughon, William P. Athens, and Paul Heinrich). Submitted to the U.S. Army Corps of Engineers, New Orleans.
- 1992c *Historic Military Quarters Handbook* (with R. Christopher Goodwin and Deborah K. Cannan). Submitted to Baltimore District, U.S. Army Corps of Engineers on behalf of Department of Defense Legacy Resource Management Program.
- 1992d *Cultural Resource Investigation of Brown's Battery Breaking Site, Berks County, Pennsylvania* (with John J. Mintz, Leo Hirrel, Hugh B. McAloon, Christopher Polglase, and Thomas W. Davis). Prepared under contract to U.S. Army Corps of Engineers.
- 1992e *Cultural Resources Investigations of Four Formerly Used Defense Sites, Mississippi* (with Stephen Hinks and Ralph Draughon). Submitted to the U.S. Army Corps of Engineers, Vicksburg.
- 1992f *Case Study: Historic Evaluation of Cantonment Areas* (with Deborah Cannan). Presentation for DoD Historical and Archeological Resources Workshop, F.E. Warren AFB, WY.
- 1992g *HAER Recordation of Buildings 28 and 28A, Norfolk Naval Shipyard, Portsmouth, VA* (with Hugh McAloon). Submitted to the Norfolk Naval Shipyard.
- 1992h *Visual Impact Study of the Proposed Millpoint Tower* (with Hugh McAloon and Katherine Grandine). Submitted to TEA Corporation.
- 1992i *Cultural Resource Investigations of Camp Shelby, Mississippi* (with Leo Hirrel). Submitted to Vicksburg District, U.S. Army Corps of Engineers.

- 1993a HAER Level 1 Documentation of the Canal Street Transit Station, New Orleans, Louisiana.
- 1993b *Cultural Resources Management Plan and Maintenance, Rehabilitation, and Repair Guidelines for Aberdeen Proving Ground, Maryland* (with Christopher Polglase, Katherine Grandine, and Thomas Davis). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1993c The National Historic Context for Department of Defense Installations. Paper presented at the Conference of the National Council on Public History, Valley Forge, Pennsylvania.
- 1993d The Rehabilitation of Mount Aventine Case Study presented to the Charles County Historical Trust.
- 1993e *Historical and Architectural Documentation of the Mississippi Basin Model, Clinton, Mississippi* (with Martha Williams and Bethany Usher). Report submitted to the Vicksburg District, U.S. Army Corps of Engineers.
- 1993f *Architectural Investigations Undertaken in Conjunction with the Base Realignment of Dahlgren Division, Naval Surface Warfare Center, Dahlgren, Virginia* (with Brooke V. Best and Leo Hirrel). Submitted to the Naval Facilities Engineering Command.
- 1993g *Historical Resource Study - Oxon Cove Park* (with Michelle T. Moran, Hugh McAloon and Peter Morrison). Report submitted to National Capital Park/East, National Park Service.
- 1993h *Fort George G. Meade - Cultural Resource Management Plan* (with Hugh McAloon, John Mintz, Martha Williams, Kathleen Child, and Leo Hirrel). Report submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1993i *Conditions Analyses and Preservation Treatment Recommendations for Historic Brick Buildings at Aberdeen Proving Ground* (with Brooke V. Best). Report submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1993j *Phase I Archeological Survey and Architectural Investigations of the Proposed Delmarva Power & Light Company, Easton-Steele 138 kV Transmission Line, Maryland* (with Michael A. Simons, Geoffrey E. Melhuish, W. Thomas Dod, and Christopher R. Polglase). Submitted to Delmarva Power & Light Company.
- 1993k *An Architectural History of St. Vincent De Paul Church, 120 North Front Street, Baltimore, Maryland* (with Michelle T. Moran and Martha R. Williams). Submitted to the St. Vincent de Paul Church.
- 1994a *Architectural and Historic Investigations for Four Former Defense Sites in Mississippi* (with Hugh B. McAloon and Leo Hirrel). Submitted to the U.S. Army Corps of Engineers, Vicksburg District.
- 1994b *Architectural Investigations Undertaken in the Dahlgren Residential Area, Naval Surface Warfare Center Dahlgren, Virginia* (with Brooke V. Best, Eliza Edwards, Leo P. Hirrel, and Patrick Jennings). Submitted to the Naval Facilities Engineering Command, Atlantic Division.
- 1994c *Architectural Assessment of Buildings 296 and 297 Naval Hospital Cherry Point, North Carolina*. Submitted to the Naval Facilities Engineering Command, Atlantic Division.

- 1994d *Architectural Survey and Assessment of the DuPont Factory Structures at the Fleet and Industrial Supply Center, Cheatham Annex, York County, Virginia* (with Katherine Grandine and Hugh McAloon). Submitted to the Naval Facilities Engineering Command, Atlantic Division.
- 1994e *Inventory of Standing Structures within the Operations and Industries Area at the Dahlgren Laboratory of the Dahlgren Division, Naval Surface Warfare Center* (with Brooke V. Best and Leo P. Hirrel). Submitted to the Naval Facilities Engineering Command, Atlantic Division).
- 1994f *National Historic Context for Department of Defense Installations, 1790 - 1940* (with Deborah K. Cannan, Leo Hirrel, Katherine E. Grandine, Bethany M. Usher, Hugh B. McAloon, and Martha R. Williams). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1994g *Phase I Cultural Resource Investigations Undertaken at the U.S. Army Reserve Area Maintenance Support Activity (AMSA) Clarksburg, WV* (with Eliza H. Edwards, Suzanne L. Sanders, Leo P. Hirrel, and Hugh McAloon). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1994h *Historic Context for Department of Defense Facilities World War II Permanent Construction* (Principal Investigator; by Deborah K. Cannan, Leo P. Hirrel, William T. Dod, and J. Hampton Tucker). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1994i *Navy Cold War Guided Missiles Context: Resources Associated with the Navy's Guided Missile Program, 1946 - 1989* (with Brooke V. Best, Eliza Edwards, and Leo Hirrel). Submitted to the Department of the Navy, Atlantic Division, Naval Facilities Engineering Command.
- 1994j *Historic Context for the Army Material Command's World War II Facilities* (with Deborah K. Cannan, Leo Hirrel, Hugh McAloon, and Brooke V. Best). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1995a *Supplemental Cultural Resource Investigations to the Cultural Resource Management Plan, Aberdeen Proving Ground: Cultural Resource Procedures and Guidelines* (with Geoffrey Melhuish and Katherine Grandine). Submitted to the Atlantic Division, Naval Facilities Engineering Command.
- 1995b *Carlisle Indian Industrial School*. Brochure prepared with William P. Giglio and William McNamee. Submitted to the U.S. Army Research Laboratory and Carlisle Barracks.
- 1995c *St. Vincent de Paul and Baltimore: The Story of a People and Their Home* (with Thomas W. Spalding). Maryland Historical Society, Baltimore, 1995.
- 1995d *Monograph on Black Walnut Rural Historic District* (with Brooke V. Best and Hugh McAloon). Submitted to Old Dominion Electric Cooperative.
- 1995e *Architectural Investigations of the Dudderar Farm, Frederick County, Maryland* (Principal Investigator; by Geoffrey E. Melhuish and Hugh B. McAloon). Submitted to the Ward Corporation.
- 1995f *HAER Documentation of the Kelly-Springfield Tire Plant, Cumberland, Maryland* (Principal Investigator). Prepared for the Allegany County Commissioners, Cumberland, Maryland.
- 1996a *Historical and Architectural Documentation of the Elmer Wolfe High School* (with Deborah Whelan). Submitted to Carroll County Public Schools, Westminster, Maryland.

- 1996b *Mason Row Maintenance Plan and National Register Documentation, Naval Weapons Station, Yorktown, Virginia* (with Katherine Grandine, Hugh McAloon, and Brooke V. Best). Submitted to Naval Facilities Engineering Command.
- 1996c *Historic American Building Survey Documentation: 5900-5910 Dalecarlia Place, Washington Aqueduct* (Principal Investigator; by Lori B. O'Donnell). Prepared for U.S. Army Corps of Engineers, Baltimore District.
- 1996d *Cultural Resource Investigations at Bayou Rapides Drainage Structure and Pumping Plant, Alexandria, Louisiana* (Principal Investigator; by Hugh McAloon). Submitted to U.S. Army Corps of Engineers, Vicksburg District.
- 1996e *HAER Recordation of Naval Surface Warfare Center Carderock Buildings 7, 11, 12, 13, 138, 139, 157* (Principal Investigator; by Geoffrey Melhuish). Submitted to Engineering Field Activity-Chesapeake, Washington D.C.
- 1996f *Architectural Investigations for the Wedgewood Industrial Park*. Submitted to Parker, Cade & Large, Inc., Millersville, Maryland.
- 1996g *Langley Air Force Base Cultural Resource Management Plan* (Principal Investigator; by Brooke V. Best, Martha Williams, and Lex Campbell). Submitted to the U. S. Army Corps of Engineers, Baltimore District.
- 1996h *Documentation of Bowie Tobacco Barn, Westwood Property, Prince George's County, Maryland* (Principal Investigator). Prepared for Donatelli & Klein, Inc.
- 1997a *Cultural Resources Investigations for Alignment and Environmental Studies, Halfway Boulevard Extended and Newgate Boulevard (PUR-577), Washington County, Maryland* (with April L. Fehr, Martha Williams, W. Patrick Giglio, and Ellen Saint Onge). Prepared for KCI Technologies.
- 1997b *Historical and Architectural Resources Protection Plan (HARP), Naval Surface Warfare Center, Carderock Division, Maryland* (Principal Investigator; by Geoffrey E. Melhuish and April L. Fehr). Submitted to Engineering Field Activity - Chesapeake.
- 1997c *Revised National Register Documentation for "Guilford", Frederick County, Maryland* (Principal Investigator; by Lex F. Campbell). Prepared for Clagett Enterprises, Inc.
- 1997d *Navy Cold War Communication Context: Resources Associated with the Navy's Communication Program, 1946-1989* (Principal Investigator; by Brooke V. Best, Katherine Grandine, and Stacie Y. Webb). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997e *Intensive Architectural Survey at Naval Base Norfolk, Virginia* (Principal Investigator; by Katherine E. Grandine). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997f *Washington Aqueduct Cultural Resource Management Plan* (Principal Investigator; by Eliza E. Burden and Martha R. Williams). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1997g *Architectural Investigations of St. Juliens Creek Annex* (Principal Investigator; by Hugh B. McAloon, Geoffrey E. Melhuish, William T. Dod, and Martha R. Williams). Submitted to Atlantic Division, Naval Facilities Engineering Command.

- 1997h *Architectural Scoping Study: The Villages at Urbana, Frederick County, Maryland* (with Geoffrey L. Melhuish). Submitted to Monocacy Land Company, L.L.C.
- 1997i *Architectural and Historic Evaluation, U.S. Naval Air Station Keflavik, Keflavik, Iceland* (Principal Investigator; by Brooke V. Best, Geoffrey E. Melhuish, and Thomas W. Davis). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1997j *Dalecarlia Water Treatment Plant Historic American Engineering Record Documentation and Dalecarlia Employee Dwellings Historic American Building Survey Documentation* (with Lori O. Thursby). Prepared for Baltimore District, U.S. Army Corps of Engineers.
- 1997k *Architectural Impact Assessment for the Bethesda Trolley Trail, Bridges Over I-495 and I-270* (with Lex F. Campbell). Prepared for Hurst-Rosche Engineers, Inc.
- 1997l *Supplemental Phase I Archeological Investigations for the Proposed Storm Water Retention Pond, Naval Surface Warfare Center Carderock, Montgomery County, Maryland* (Principal Investigator; by April L. Fehr and Andrew D. Madsen). Prepared for Engineering Field Activity -Chesapeake, Washington, D.C.
- 1997m *Addendum Report to Phase I Archeological and Architectural Investigations for the Monrovia Wastewater Treatment Plant, Frederick County, Maryland* (with Geoffrey E. Melhuish and April L. Fehr). Prepared for Frederick County Department of Public Works.
- 1997n *Center of Military History, U.S. Army Ordnance Museum, Outdoor Ordnance Collection at Aberdeen Proving Ground, National Register Nomination* (Principal Investigator; by Katherine Grandine and Jane Armstrong). Prepared for Aberdeen Proving Ground and Baltimore District, U.S. Army Corps of Engineers.
- 1997o *HABS Recordation of Stephen J. Barbre Middle School, Kenner, Louisiana*. Submitted to Southeast Regional Office, National Park Service.
- 1997p *Architectural Survey and Impact Assessment for the Proposed Royal Oaks Subdivision, New Market, Maryland* (Principal Investigator; by Lex F. Campbell). Prepared for NML Corporation.
- 1997q *Architectural Evaluations of Properties I and IV for the Washington Gas Company Pipeline, Prince George's and Charles Counties, Maryland* (Principal Investigator; by Lori O. Thursby). Prepared for Stone & Webster Environmental Technology & Services.
- 1997r *Architectural Documentation of the Guilford Tenant House, Frederick, Maryland* (Principal Investigator; by Lex Campbell). Prepared for Clagett Enterprises, Inc.
- 1997s *Object Inventory, Edgewood Area, Aberdeen Proving Ground Summary Report* (with Katherine Grandine and Jane Armstrong). Prepared for Baltimore District, U.S. Army Corps of Engineers.
- 1997t *Architectural Investigation of St. Timothy's School, Baltimore County, Maryland* (with Lex Campbell and Jane Armstrong). Prepared for St. Timothy's School, Stevenson, Maryland.
- 1997u *Historic American Buildings Survey Documentation: Abbey Mausoleum and Washington Navy Yard Buildings 28, 142, 143, 198, 201, 104, and 197* (Principal Investigator; by Katherine Grandine and Geoffrey Melhuish). Prepared for Engineering Field Activity - Chesapeake.

- 1997v *Architectural Investigations of the Pettingall/Bussard Farm, Frederick County, Maryland* (Principal Investigator; by W. Patrick Giglio and Jane Armstrong). Prepared for Maryland National Golf Club.
- 1997w *Architectural Resources Survey of 3,700 Acres, Naval Security Group Activity, Northwest, Chesapeake, Virginia* (Principal Investigator; by Brooke V. Best). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997x *Historic Preservation Plan: United States Naval Academy, Annapolis, Maryland* (Co-Principal Investigator; by Lex Campbell, John Seidel, and Martha Williams). Prepared for Engineering Field Activity - Chesapeake.
- 1997y *Preservation Analysis of the Derr House, Frederick, Maryland* (Principal Investigator). Prepared for Natelli Associates, Inc.
- 1998a *Architectural Analysis of Gateway Park Development, Prince George's County, Maryland* (Principal Investigator). Prepared for Federal Realty Investment Trust.
- 1998b *Intensive Level Architectural Survey at Naval Surface Warfare Center, Carderock Division, Annapolis Detachment, Annapolis, Maryland* (Principal Investigator; by Geoffrey Melhuish and Lori O. Thursby). Submitted to the Department of the Navy, Engineering Field Activity-Chesapeake.
- 1998c *Historic American Engineering Record Documentation: Caryville Bridge, Holes and Washington Counties, Florida* (Principal Investigator; by Lex Campbell, Brooke Best, and Michael Godzinski). Prepared for Florida Department of Transportation.
- 1998d *National Register Documentation for Indian Head White Plains Railroad, Indian Head Naval Surface Warfare Center, Charles County, Maryland* (Principal Investigator; by Elaine Kiernan and Lex Campbell). Prepared for Engineering Field Activity - Chesapeake, Washington Navy Yard.
- 1998e *Mason Row National Register Nomination, Naval Weapons Station Yorktown, Yorktown, Virginia* (Principal Investigator; by Katherine Grandine). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998f *Architectural Investigations at Naval Station Roosevelt Roads, Roosevelt Roads, Puerto Rico* (Principal Investigator; by Brooke Best, W. Patrick Giglio, Geoffrey Melhuish, and Julian Granberry). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998g *MHT Documentation for the Gay Street Historic District* (Principal Investigator; by Elaine Kiernan). Prepared for Maryland Department of General Services.
- 1998h *Aberdeen Proving Ground Cold War Era Historic Context* (Principal Investigator; by Katherine Grandine). Prepared for Baltimore District, U.S. Army Corps of Engineers.
- 1998i *Architectural Investigations at Marine Corps Air Station Cherry Point, North Carolina* (Principal Investigator; by W. Patrick Giglio, Brooke Best, Lex Campbell, and Hugh McAloon). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998j *Historical and Architectural Resources Protection Plan (HARP), Naval Surface Warfare Center, Carderock Division, Maryland* (Principal Investigator; by Geoffrey Melhuish and April Fehr). Prepared for Engineering Field Activity - Chesapeake.

- 1998k *Architectural Survey and Assessment of Naval Amphibious Base, Little Creek, Virginia Beach, Virginia* (Principal Investigator; by Lex F. Campbell and Lori B. O'Donnell). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998l *Historical Assessment of the Laurel Machine Shop, Laurel, Maryland* (Principal Investigator; by Brian Clevon). Prepared for Chester Engineers.
- 1998m *Architectural Inventory of Norfolk Naval Shipyard and Satellite Activities, Norfolk, Virginia* (with Hugh B. McAloon, Geoffrey E. Melhuish, William T. Dod, and Martha R. Williams). Submitted to the Naval Facilities Engineering Command, Atlantic Division.
- 1998n *Wyoming Valley Levee Raising Project: Intensive Architectural Survey in the Susquehanna River Valley* (Principal Investigator; with Katherine Grandine, Elaine Kiernan, and Jane Armstrong). Submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1998o *Architectural Investigations of the Proposed Villages of Urbana Planned Urban Development (PUD) Frederick County, Maryland* (Principal Investigator; by Geoffrey Melhuish). Prepared for Monocacy Land Co., L.L.C.
- 1998p *Phase III Jackson Historic Resources Survey* (Principal Investigator; by Lex Campbell and Sheila Lewis). Prepared for City of Jackson, MS.
- 1998q *Chemical Area Storage Yard (CASY), Aberdeen Proving Ground, Edgewood Area, MHT Historic Properties Inventory Form* (Principal Investigator; with Katherine Grandine). Prepared for Dynamac Corporation.
- 1998r *Maryland Historical Trust State Historic Sites Inventory Form for Building Numbers 115, 123, 132, 144, and 153, Naval Surface Warfare Center, Carderock Division* (Principal Investigator; by Lex Campbell). Prepared for Naval Surface Warfare Center, Carderock Division.
- 1998s *Supplemental Architectural Investigations, Determination of Eligibility Documentation for Select Buildings, Indian Head Naval Surface Warfare Center, Charles County, Maryland* (Principal Investigator; by Lex Campbell, W. Patrick Giglio, and Elaine Kiernan). Prepared for Engineering Field Activity – Chesapeake.
- 1998t *Preliminary Cultural Resources Management Plan for Defense Supply Center Richmond (DSCR), Chesterfield County, Virginia* (Co-Principal Investigator with Ann Markell; Brooke Best, Bradley McDonald, Ann Markell, Henry Measells, and Brian Clevon). Prepared for Mill Creek Environmental Consultants, Ltd.
- 1998u *Phase I Architectural Survey and Archeological Investigations at Naval Communication Detachment Cheltenham, Prince George's County, Maryland* (Principal Investigator with Christopher R. Polglase; April Fehr and Katherine Grandine). Submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1998v *Integrated Cultural Resources Management Plan, US Army Garrison, Fort Belvoir, Virginia* (Co-Principal Investigator with Christopher R. Polglase; Brooke Best, W. Patrick Giglio, and Martha Williams). Submitted to Dewberry & Davis on behalf of the Environmental & Natural Resources Division, Fort Belvoir, Virginia.

- 1999a *Architectural Survey and Assessment of Naval Air Station Oceana and Naval Auxiliary Landing Field Fentress, Virginia* (Principal Investigator; by Geoffrey E. Melhuish). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1999b *Archival and Architectural Investigations at Naval Station Roosevelt Roads, Puerto Rico* (Principal Investigator; by Brooke V. Best, W. Patrick Giglio, Geoffrey Melhuish, and Julian Granberry). Prepared for Naval Facilities Engineering Command.
- 1999c *Architectural Survey of NSGA Sabana Seca, Sabana Seca, Puerto Rico* (Principal Investigator; by Brooke V. Best). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1999d 800 Carroll Parkway, Frederick, Maryland, National Register Nomination (Principal Investigator; by Katherine Grandine). Prepared for Stuart/Grey Corporation.
- 1999e *Architectural Reconnaissance Survey of the Proposed Beech Tree Development, Prince George's County, Maryland* (Principal Investigator; by Katherine Grandine, Elaine Kiernan, and Brian Clevon). Prepared for Ryko Development, Inc.
- 1999f National Register of Historic Places Registration Form for Florida Avenue Siphon, New Orleans, Louisiana (Principal Investigator; by Brian Clevon and Ralph Draughon). Prepared for U.S. Army Corps of Engineers, New Orleans District.
- 1999g *Indian Head Division, Naval Surface Warfare Center, Historic and Archeological Resource Protection Plan* (Principal Investigator; by Thomas W. Davis). Prepared for Engineering Field Activity-Chesapeake.
- 1999h *Historic American Engineering Record Documentation: Florida Avenue Bridge, New Orleans, Louisiana* (with Brian Clevon and Ralph Draughon). Prepared for the United States Coast Guard Eighth Coast Guard Division.
- 1999i *Archeological Evaluation of Dudderar Farm (18FR729), Urbana, Frederick County, Maryland* (with Sonja Ingram, Hugh McAloon, and Geoffrey Melhuish). Submitted to Monocacy Land Company, LLC.
- 1999j *Architectural Inventory of New Jersey Army National Guard Facilities* (Principal Investigator; by Elaine K. Kiernan). Prepared for Southwest Missouri State University.
- 1999k *Interim Report on Architectural Reconnaissance Survey of the Proposed Independence Pipeline Corridor through Lawrence, Butler, Armstrong, Clarion, Jefferson, Forest, and Elk Counties, Pennsylvania* (Principal Investigator; by Elaine Kiernan, Patrick Giglio, Brooke Best, and Martha Williams). Submitted to ANR Pipeline Company.
- 1999l *Architectural Evaluation of the Farmstead on Rosenstock North Farm* (Principal Investigator; by Katherine Grandine). Submitted to Buckeye Development Construction Company, Inc.
- 1999m Visual Impact Assessment for Hunters Brooke Subdivision. Submitted to Universal Development Company, LLC.
- 1999n National Register Evaluation of the Claiborne Storehouse (Principal Investigator; by Katherine Grandine and Ralph Draughon). Submitted to New Orleans District, U.S. Army Corps of Engineers.

- 1999o *Architectural Documentation of the Sebastian Derr House, Frederick, Maryland* (Principal Investigator; with Katherine Grandine, W. Patrick Giglio, Brian Clevén, and Barry Warthen). Submitted to Natelli Communities.
- 1999p *Letter Report for MD 18: U.S. 301 to Greenspring Road, Queen Anne's County, Maryland* (Principal Investigator; with Katherine E. Grandine, W. Patrick Giglio, and Justin Edgington). Submitted to Maryland Department of Transportation.
- 1999q *Walter Reed Army Medical Center Integrated Cultural Resources Management Plan* (Principal Investigator; with W. Patrick Giglio). Submitted to U.S. Army Corps of Engineers, Baltimore District.
- 1999r *Architectural and Historical Assessment of 9150 Darnestown Road, Rockville, Maryland* (Principal Investigator; with Brian Clevén and Katherine Grandine). Prepared for Dr. Bor-Chung Lee through Miller, Miller, & Canby, Rockville, Maryland.
- 1999s *Preliminary Cultural Resources Management Plan for Defense Supply Center Richmond (DSCR)* (Principal Investigator with Ann Markel; with Brooke Best, Henry Measells, and Brian Clevén). Prepared for Mill Creek environmental Consultants, Ltd., Hampton, Virginia,
- 1999t *Architectural and Historical Evaluation of the Kelly-Brewser House, 1853 Reisterstown Road, Pikesville, Maryland*. Prepared for Southwood Holding Corporation, Baltimore, Maryland.
- 1999u *National Register Documentation for Indian Head White Plains Railroad, Indian Head Naval Surface Warfare Center, Charles County, Maryland* (Principal Investigator; with Elaine K. Kiernan and Lex Campbell). Submitted to Department of the Navy, EFA Chesapeake.
- 2000a *Letter Report for Frederick House (BA-1206)* (Principal Investigator; with Katherine Grandine). Submitted to Mr. Arthur S. Tracey Personal Representative Eda Ensor Estate.
- 2000b *Rehabilitation Analysis of the Edward Campbell Farmstead, Frederick, Maryland* (Principal Investigator; with W. Patrick Giglio and Brian Clevén). Submitted to Millennium Development Group, L.L.C.
- 2000c *Integrated Cultural Resource Management Plan: Naval Surface Warfare Center, Carderock Division* (Principal Investigator; with April L. Fehr and Brooke V. Best). Submitted to Naval Surface Warfare Center.
- 2000d *Historic American Engineering Record Documentation: Galvez Street Wharf, New Orleans, Louisiana* (Principal Investigator; by Brian Clevén). Submitted to United States Coast Guard.
- 2000e *Integrated Cultural Resource Management Plan, United States Naval Academy, Annapolis, Maryland* (Principal Investigator; by Lex Campbell, John L. Seidel, and Martha R. Williams). Prepared for Engineering Field Activity – Chesapeake.
- 2000f *Campbell Farmstead (F-8-23) Addendum to Maryland Inventory of Historic Properties Form* (Principal Investigator; by Katherine E. Grandine and Brian Clevén). Prepared for Riverside Investment Group, LLC.

- 2000g *Architectural Recordation of Frederick Memorial Hospital and Nurses' Home, Frederick Maryland* (Principal Investigator; by Justin Edgington and Katherine E. Grandine). Prepared for Frederick Memorial Hospital.
- 2000h *Evaluation of National Register Eligibility of Bayou Boeuf, Bayou Sorrel, and Berwick Locks and the Calumet and Charenton Floodgates in the Atchafalaya Basin, Louisiana* (Principal Investigator; by Brian Cleven and Brooke V. Best). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2000i *Historic American Engineering Record Documentation: Rock Creek Trestle, Montgomery County, Maryland* (Principal Investigator; by Brian Cleven). Prepared on behalf of Hurst-Rosche Engineers, Inc. for Montgomery County Department of Public Works and Transportation.
- 2000j *Historic American Engineering Record Documentation: Keystone Lock and Dam, St. Martinville, Louisiana* (Principal Investigator; by Brian Cleven). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2000k *National Register Assessment of the Lock Keepers Dwelling at the Keystone Lock and Dam, St. Martin Parish, Louisiana* (with Brian Cleven). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2000l *Architectural Inventory of the Gordon Building, 57 South Market Street, Frederick, Maryland* (Principal Investigator; by Brian Cleven and Nathaniel Patch). Prepared for the City of Frederick, Maryland.
- 2000m *Village on Falling Spring Transportation Enhancement Project, Borough of Chambersburg, Franklin County, Pennsylvania*. Prepared for Gannett Fleming, Inc.
- 2000n *Maryland Inventory of Historic Property Form: Birkhead House, 23629 Woodfield Road, Montgomery County* (Principal Investigator; with Katherine Grandine). Prepared for Iko Development, Inc.
- 2000o Speaker. *Tools for Preservation Planners*. Preservation and Revitalization Conference, Preservation Maryland.
- 2000p *Analysis of Regulations for Compliance with Section 106 of the National Historic Preservation Act of 1966, as Amended* (with April Fehr). Submitted to The INGAA Foundation, Inc.
- 2000q *Historical and Architectural Investigation of Memorial Stadium, Baltimore, Maryland* (with Brian Cleven). Prepared for Maryland Stadium Authority, Baltimore, Maryland.
- 2000r *Documentation of Federated Charities Building, 22 South Market Street, Frederick, Maryland* (Principal Investigator with Brian Cleven, Katherine Grandine, Justine Edgington, and Barry Warthen). Prepared for Federated Charities Corporation of Frederick.
- 2000s Sheffer House, Middletown, Maryland. Federal and State Historic Rehabilitation Tax Certification prepared for Mr. & Mrs. Goodloe E. Byron.
- 2000t Francis Scott Key Hotel, Frederick, Maryland. Federal Historic Rehabilitation Tax Certification prepared for Struever Bros., Eccles & Rouse, Inc.

- 2000u Thomas Cannery, Montgomery County, Maryland. Federal and State Historic Rehabilitation Tax Certification prepared for Rockville Fuel and Feed.
- 2000v *National Register Nomination for the Sheffer House* (Principal Investigator; with Katherine Grandine). Prepared for Mr. & Mrs. Goodloe E. Byron.
- 2000w *Study of Building Ornamentation at Langley Air Force Base, Langley, Virginia* (Principal Investigator; with Katherine Grandine and Justine Edgington). Submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 2000x *Marketing Prospectus for the Edward Campbell Farm, Frederick, Maryland*. Prepared for Millennium Development Corporation.
- 2000y *MD 26: Liberty Reservoir to MD 32, Carroll County, Maryland, Project No. CL850B11* (Principal Investigator; with Katherine Grandine). Prepared for the Maryland State Highway Administration.
- 2001a *Communications Tower Sites in Frederick County Maryland – Murphy Farm and Buffington Farm*. Assessment prepared for Sprint PCS.
- 2001b *Fairview (71A-13) Environmental Setting*. Letter report prepared for the Prince George's County Planning Department.
- 2001c *National Register Assessment of the Broadmoor Neighborhood* (with Katy Coyle). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2001d Speaker. *Symposium on the Management of Capehart-Wherry Era Housing*. Department of the Army.
- 2001e *Energy Panel*. Task Force on Energy, Advisory Council on Historic Preservation Meeting, San Francisco, California.
- 2001f *Aberdeen Proving Ground Integrated Cultural Resources Management Plan*. (Principal Investigator with Christopher R. Polglase; with Katherine Grandine and Thomas W. Davis). Submitted to Advanced Technology Systems, Inc.
- 2001g *Historic American Engineering Record Documentation: St. Claude Bridge, New Orleans, Louisiana* (Principal Investigator; with Brian Cleven). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2001h *Historic American Engineering Record Documentation: Inner Harbor Navigation Canal Lock, New Orleans, Louisiana* (Principal Investigator; with Brian Cleven). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2001i *Supplemental Architectural and Historical Investigations for the Proposed Duke Energy Facility on the Vernon-Hines and Urciolo Properties, Frederick County, Maryland* (Principal Investigator; by Katherine Grandine, Brian Cleven, and Nathaniel Patch). Prepared for Environmental Consulting & Technology, Inc.
- 2001j *Jesup Blair House and Park, Montgomery County, Maryland, Maryland Inventory of Historic Properties Form* (Principal Investigator; with Kirsten Peeler). Prepared for Montgomery College.

- 2001k *Phase I Archeological Survey for the Proposed Duke Energy North America (DENA), LLC Powerplant, German Township, Fayette County, Pennsylvania (Pennsylvania Environmental Report #2001-1219-051-C)* (with Jesse Kulp, Peter Holmes, Brian Clevon, Katherine Grandine, Michael Hornum, and Scott Meacham). Prepared for CH2M Hill.
- 2001l *Archeological and Historical Investigations for the Proposed Duke Energy Facility on the Offutt Property, Frederick, Maryland* (Principal Investigator; by Katherine Grandine, Brian Clevon, Scott Meacham, and Nathaniel Patch). Prepared for Environmental Consulting & Technology, Inc.
- 2001m *Architectural Investigation of Buildings and Structures at the Naval Surface Warfare Center Carderock Division Memphis Detachment, Memphis, Tennessee* (Principal Investigator; by Scott Meacham and Katherine Grandine). Prepared for Public Works Department.
- 2001n *Historic Context for Army Fixed-Wing Airfields 1903-1989* (Principal Investigator; by Katherine Grandine, Brian Clevon, Thomas W. Davis, and Nathaniel Patch). Prepared for U.S. Army Environmental Center.
- 2002a *Historic Properties Report on Hangars 745, 755, and 756, Langley Air Force Base, City of Hampton, Virginia VDHR File No. _____* (Principal Investigator; by Katherine Grandine and Brian Clevon). Prepared for Science Applications International Corporation (SAIC).
- 2002b *Evaluation of the National Register Eligibility of Calcasieu Lock, Calcasieu Parish, Louisiana* (Principal Investigator; with Brian Clevon). Prepared for U.S. Army Corps of Engineers.
- 2002c *Historic American Buildings Survey Documentation: Fort Monroe, Buildings 65, 66, 67, 68, 69, 70, and 79* (Principal Investigator; by Katherine Grandine). Prepared for DPW Environmental Office.
- 2002d *HABS/HAER Level II Documentation of the Paint and Oil Storehouse (Building No. 216), Naval Air Station Patuxent River, St. Mary's County, Maryland* (Principal Investigator; by Carrie Albee). Prepared for Naval Air Station Patuxent River.
- 2002e *Maryland Historical Trust Architectural Inventory Documentation Duke Energy North America Facility in Frederick County, Maryland* (Principal Investigator; by Katherine Grandine, Brian Clevon, and Nathaniel Patch). Prepared for Environmental Consulting & Technology, Inc.
- 2002f *Archival, Architectural, and Geophysical Remote Sensing Investigation at the Montevue Property, Frederick County, Maryland* (Principal Investigator with Christopher R. Polglase; by William Lowthert IV, Scott Meacham, Nate Patch, Brian Clevon, Jean B. Pelletier, and Katherine Grandine). Prepared for the Frederick County Department of Public Works.
- 2002g *Middletown Primary School Site Assessment, Middletown, Maryland* (Principal Investigator; by Brian Clevon). Prepared for Frederick County Public Schools.
- 2002h *Research Design for Cultural Resource Assessment of Six State Parks, State Owned Cultural Resource Assessment Program, Department of Natural Resources Pilot Study* (Principal Investigator with Christopher R. Polglase; by Katherine E. Grandine, Jeffrey H. Maymon, and Martha Williams). Prepared for Maryland Historical Trust.
- 2002i *Archeological, Historical, and Architectural Reconnaissance Study of Crab Cay, Exuma Island, The Bahamas* (with Suzanne L. Sanders, R. Christopher Goodwin, and Jennifer A. Brown). Prepared for Islands By Design Ltd.

- 2002j *Baltimore East/South Clifton Park Historic District National Register Nomination* (Principal Investigator; by Katherine E. Grandine, Brian Cleven, Kirsten G. Peeler, Carrie Albee, and Nathaniel S. Patch). Prepared for Center Development Corporation.
- 2002k *Charity Ellen Frazier Farm Assessment, Knoxville, Maryland* (Principal Investigator; by Brian Cleven and Christine Heidenrich). Prepared for Hailey Development LLC.
- 2002l *HABS/HAER Level II Documentation of Boat House No. 2 (Building 214) Naval Air Station Patuxent River, St. Mary's County, Maryland* (Principal Investigator; by Katherine Grandine). Prepared for Naval Air Station Patuxent River.
- 2003a *Unaccompanied Personnel Housing (UPH) during the Cold War (1946-1989)* (Principal Investigator; with Brian Cleven, Nathaniel Patch, Katherine Grandine, and Christine Heidenrich). Prepared for the U.S. Army Environmental Center.
- 2003b *Neighborhood Design Guidelines for Army Wherry and Capehart Family Housing* (Principal Investigator; by Kirsten Peeler and Reid Wraase) Prepared for the Department of the Army.
- 2003c *Housing an Army: The Wherry and Capehart Era Solutions to the Postwar Family Housing Shortage (1949-1962) Historic Context* (Principal Investigator; with Kirsten Peeler, Christine Heidenrich, Carrie Albee, and Katherine Grandine). Prepared for the Department of the Army.
- 2003d *Comus Inn National Register Nomination*. Prepared for the Comus Inn, Comus, Maryland.
- 2003e *Maryland Heritage Preservation & Federal Historic Preservation Certification Applications, Parts 1 & 2*. Prepared for the Comus Inn, Comus, Maryland.
- 2003f *Heritage Preservation Public Interpretation Kiosk* (Principal Investigator; with Reid Wraase and Christine Heidenrich). Prepared for Ikea, Inc.
- 2003g *Section 106 Effects Report, and Alternate Assessment for the Community Clinical and Behavioral Health Center, Baltimore, Maryland* (Principal Investigator; with Dr. R. Christopher Goodwin). Prepared for Kennedy Krieger Institute, Inc.
- 2003h *Historical and Architectural Investigations of Milcon P160, Indian Head Division, Naval Surface Warfare Center, Indian Head, Charles County, Maryland* (Principal Investigator; by Brian Cleven). Prepared for Indian Head Division, Naval Surface Warfare Center, Indian Head.
- 2004a *Determination of Eligibility Report Owens Property (Landing Road Cider Mill [MIHP #HO-420]), Howard County, Maryland* (Principal Investigator; by Brian Cleven, and Kathryn G. Smith). Prepared for The Keelty Company.
- 2004b *Maryland Heritage Preservation and Federal Historic Preservation Certification Applications. Parts 1, 2, & 3, Francis Scott Key Hotel, Frederick, Maryland*. Prepared for Struever Bros., Eccles & Rouse, Inc.
- 2004c *Draft Programmatic Agreement*. Prepared for Indian Head Division, Naval Surface Warfare Center, Indian Head.

- 2004d *Architectural Survey for the Proposed Crown Landing Project Logan Township, Gloucester County, New Jersey and New Castle County, Delaware* (Principal Investigator; by Brian Clevon and Martha Williams). Prepared for Environmental Resource Management.
- 2004e *Historical and Architectural Investigation of 1950s-era Industrial Areas and Miscellaneous Buildings, Indian Head Division, Naval Surface Warfare Center, Indian Head, Charles County, Maryland* (Principal Investigator; by Brian Clevon). Prepared for Indian Head Division, NSWC.
- 2004f *Determination of Eligibility Report; Feaga-Albaugh Farmstead, Frederick County, Maryland* (Principal Investigator; by Kathryn G. Dixon). Prepared for Horizon Frederick II LLC.
- 2005a *Determination of Eligibility Forms for Griffith's Adventure (Joshua F.C. Worthington House BA-0011)* (Principal Investigator; by Kirsten Peeler). Prepared for Whitney, Bailey, Cox & Magnani.
- 2005b *Determination of Eligibility Reports; Demarr Property (CH812), Quarles Property (CH-814), and Vliet Property (CH-813)* (Principal Investigator; by Kirsten Peeler, Kathryn Dixon, and Christine Heidenrich). Prepared for Whitman, Requardt and Associates, LLP.
- 2005c *Architectural Investigations for the Proposed Sudley Manor Drive Public-Private Transportation Act (PPTA), Prince William County, Virginia* (Principal Investigator; by Katherine Grandine and Martha Williams). Prepared for CH2M Hill.
- 2005d *Focused Literature Search – Naval Air Station Atlantic City* (Principal Investigator; by Dean Doerrfeld and Brian Clevon). Prepared for TRC Environmental Corporation.
- 2005e *Determination of Eligibility Report; Elmwood Farm, Washington County, Maryland MIHP No. WA-I-018* (Principal Investigator; by Kathryn G. Dixon and Kirsten Peeler). Prepared for Elmwood Farm Development, LLC c/o Terra Consultants, Inc.
- 2005f *An Addendum Report to Phase I Archeological Investigation of 15 Acres within the West Campus Shepherd University, Jefferson County, West Virginia* (Principal Investigator; by Dean A. Doerrfeld and Chris Heidenrich). Prepared for Shepherd University Facilities Management.
- 2005g *National Register of Historic Places Nomination for Spring Hill Farm, Loudoun County, Virginia* (Principal Investigator; by Dean Doerrfeld and Chris Heidenrich). Prepared for Larry Ritchie Williams.
- 2005h *National Register of Historic Places Nomination for Whiteford-Cardiff Historic District* (Principal Investigator; by Christine A. Heidenrich and Kirsten Peeler). Prepared for Whiteford, Pylesville, Cardiff Community Association, Inc.
- 2005i *Determination of Eligibility Form for Christian Kemp Farmstead (MIHP F-1-179)* (Principal Investigator; by Christine Heidenrich and Dean Doerrfeld). Prepared for Ausherman Development Corporation.
- 2005j *Gap Analysis, Mitigation for Cold War Era Unaccompanied Personnel Housing, World War II, and Cold War Era Ammunition Bunkers and Army Ammunition Plants* (Principal Investigator; by Dean A. Doerrfeld). Prepared for U.S. Army Medical Research Acquisition Activity.
- 2005k *MIHP Form: PG:71-38, Bridge No. 16017, MD 450 Over CSX Railroad, Bowie, Maryland* (Principal Investigator; by Kathryn Dixon). Prepared for Maryland Department of Transportation.

- 2005l *Historic Context for Washington State Air National Guard* (with Kirsten Peeler, Dean A. Doerrfeld, and Christine Heidenrich). Prepared for Air National Guard Readiness Center.
- 2005m *Walter Reed Army Medical Center Integrated Cultural Resources Management Plan* (Principal Investigator; by Katherine E. Grandine). Prepared for USAMRAA.
- 2005n *Environmental Assessment for the Disposition of Belle Chance Residence and Outbuildings, Andrews AFB, MD* (Principal Investigator; by Brian Clevon). Prepared for the Department of the Air Force.
- 2005o *World War I Barracks (E4400 Block) and Service Buildings at Edgewood Arsenal, Historical Documentation* (Principal Investigator; by Kathryn G. Dixon). Prepared for Aberdeen Proving Ground through U.S. Army Medical Research Acquisition Activity.
- 2005p *Determination of Eligibility Form for Bishop Field, United States Naval Academy* (Principal Investigator; by Dean A. Doerrfeld and Kathryn Dixon). Prepared for A. Morton Thomas Associates, Inc.
- 2005q *Maryland Determination of Eligibility Report for Lord Golf Project Fox Hall Farm* (Principal Investigator; by Dean A. Doerrfeld and Kathryn Dixon). Prepared for Lionheart Consulting.
- 2005r *Determination of Eligibility for Smith Farm (F-2-111)* (Principal Investigator; by Kirsten G. Peeler and Kathryn G. Dixon). Prepared for Jefferson Valley, LLC c/o Ausherman Development Corporation.
- 2005s *MIHP Form for Edgewood Area Industrial Area, Edgewood Area, Aberdeen Proving Ground, Maryland* (Principal Investigator; by Katherine Grandine). Prepared for Aberdeen Proving Ground.
- 2006a *BRAC/EIS Cultural Resources Support*. Prepared for Weston Solution, Inc.
- 2006b *Summary Report of Archival Research Department of the Navy Unaccompanied Personnel Housing (1946-1989) and Ammunition Storage Facilities (1939-1984)* (Principal Investigator; by Dean A. Doerrfeld).
- 2006c *Determination of Eligibility Form for Good Fellowship, MIHP #HO-190, Howard County, Maryland* (Principal Investigator; by Dean A. Doerrfeld). Prepared for Davis Branch LLC.
- 2006d *Housing an Air Force and a Navy: The Wherry and Capehart Era Solutions to the Postwar Family Housing Shortage (1949-1962)* (Principal Investigator; by Kirsten Peeler, Christine Heidenrich, Katherine E. Grandine, and Dean A. Doerrfeld). Prepared for the United States Departments of the Air Force and Navy.
- 2006e *Maryland Inventory of Historic Properties Form: Feaga-Albaugh Farmstead, Frederick County, Maryland; MIHP No. F-3-226* (Principal Investigator; by Kathryn G. Dixon). Prepared for Cannon Bluff, LLLP.
- 2007a *Maryland Inventory of Historic Properties Form for Broadway Squares (B-5138) Baltimore City, Maryland* (Principal Investigator; by Kirsten Peeler, M.S.). Prepared for Madison Street Properties, Inc.

- 2007b *National Register Assessment of Buildings 7033, 7034, 7036, and 7215, Custer Hill Troop Area, Fort Riley, Kansas* (Principal Investigator; by Brian Cleven). Prepared for Fort Riley Kansas and U.S. Army Environmental Center.
- 2007c *Survey of the Architectural and Archeological Cultural Resources at the Virginia Air National Guard Installations at the Richmond International Airport, Henrico County and the State Military Reservation, Camp Pendleton, City of Virginia Beach, Virginia* (Principal Investigator; with Ann B. Markell, Katherine Grandine, and Nathan Workman). Prepared for ANGRC/CEVP.
- 2007d *Army Ammunition and Explosives Storage During the Cold War (1946-1989)* (Principal Investigator; by Kathryn Dixon, Dean A. Doerrfeld, Rebecca Gatewood, Kirsten Peeler, Christine Heidenrich, and Katherine E. Grandine). Prepared for USAEC.
- 2007e *Maryland Inventory of Historic Properties Addendums for 14 Properties* (Principal Investigator; by Brian Cleven and Kirsten Peeler). Prepared for H.B. Mellott Estate, Inc.
- 2007f *Army Ammunition Production During the Cold War (1946-1989)* (Principal Investigator; by Christine Heidenrich, Dean A. Doerrfeld, Rebecca Gatewood, Kirsten Peeler, Katherine E. Grandine, Heather McMahon, and Benjamin Riggle). Prepared for USAEC.
- 2007g *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Blue Grass Army Depot, Richmond, Kentucky* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2007h *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Anniston Army Depot, Anniston, Alabama* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2007i *Determination of Eligibility Forms for: Thomas W. Hall Farm (AA-2382) and Tobacco Farm on Johns Hopkins Road (AA-2383)* (Principal Investigator; by Kirsten Peeler). Prepared for McCrone, Inc.
- 2008a *Cultural Resources Survey, Architecture and Archeology, of Maine Air National Guard Installations at Bangor Air National Guard Base and South Portland Air National Guard Station, Penobscot and Cumberland Counties, Maine* (Principal Investigator with Ellen R. Cowie; with Jeffrey Maymon, Brian Cleven, Kathryn Dixon, Rebecca Gatewood, and Nathan S. Workman). Prepared for Air National Guard Readiness Center.
- 2008b *Cultural Resources Survey for Architecture and Archaeology of the Vermont Air National Guard Installation at Burlington International Airport, Chittendon County, Vermont* (Principal Investigator with Ann B. Markell; by Ann B. Markell, Kirsten Peeler, Christine Heidenrich, Martha Williams, and Nathan Workman). Prepared for Air National Guard Readiness Center.
- 2008c *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: White Sands Missile Range, White Sands, New Mexico* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for U.S. Army Environmental Command.
- 2008d *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Aberdeen Proving Ground, Aberdeen Maryland* (Principal Investigator; by Katherine Grandine). Prepared for U.S. Army Environmental Command.

- 2008e *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Louisiana Army Ammunition Plant, Minden Louisiana* (Principal Investigator; by Kirsten Peeler, Dean Doerrfeld, and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2008f *Pinnacle Wind Project, Mineral County, West Virginia – Phase I Investigation for Architectural and Structural Resources* (Principal Investigator; by Rebecca J. Gatewood, Katherine Grandine, Chris Heidenrich, and Dean A. Doerrfeld). Prepared for Pinnacle Wind Force, LLC.
- 2008g *Army Ammunition Production During the Cold War Era – Site Report. Radford Army Ammunition Plant, Radford Virginia* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2008h *Army Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Pine Bluff Arsenal, Pine Bluff, Arkansas* (Principal Investigator; by Katherine Grandine and Dean A. Doerrfeld). Prepared for U.S. Army Environmental Command.
- 2008i *Army Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Anniston Army Depot, Anniston, Alabama* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2008j *Army Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Hawthorne Army Depot, Hawthorne, Nevada* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2008k *Army Ammunition Production During The Cold War Era - Site Report: Iowa Army Ammunition Plant, Burlington, Iowa* (Principal Investigator; by Dean A. Doerrfeld). Prepared for U.S. Army Environmental Command.
- 2008l *Determination of Eligibility Form for Cricket Creek Farm (HO-480)* (Principal Investigator; by Kirsten Peeler). Prepared for Coscan/Adler Limited Partnership.
- 2008m *Programmatic Environmental Assessment for Site Selection, Veterans Affairs Medical Center (VAMC) and Louisiana State University Academic Medical Center of Louisiana (LSU AMC)* (with Katy Coyle and Lindsay Hannah). Submitted by EarthTech to the Department of Veterans Affairs and the Federal Emergency Management Agency.
- 2009a *Preliminary National Register of Historic Places Evaluation for the Enrico Fermi Atomic Power Plant Monroe County, Lagoona Beach, Michigan* (Principal Investigator; by Dean A. Doerrfeld and Ben Riggie). Prepared for Commonwealth Cultural Resources Group, Inc.
- 2009b *Architectural Investigations for the Monocacy Boulevard Central Section City of Frederick, Maryland* (Principal Investigator; by Kirsten Peeler and Melissa Crosby). Prepared for Fox & Associates, Inc.
- 2009c *Integrated Cultural Resource Management Plan for the Bangor International Airport (ANG) and the South Portland Air National Guard Station, Maine Air National Guard* (with Kathryn G. Dixon, Jeffrey H. Maymon, Troy J. Nowak, Adam Friedman, Nathan S. Workman, and Lindsay Hannah). Prepared for Maine Air National Guard and National Guard Bureau.

- 2009d *Architectural Reconnaissance Survey Blue Creek Wind Farm Project Paulding and Van Wert Counties, Ohio* (Principal Investigator; by Benjamin M. Riggle, Jennifer L. Evans, and Melissa Crosby). Prepared for Heartland Wind, LLC.
- 2009e *Site-Specific Environmental Assessment for Building #2 The Veterans Affairs Medical Center (VAMC), New Orleans, Louisiana* (with Katy Coyle, Lindsay Hannah, and Nathanael Heller).
- 2010a *Integrated Cultural Resource Management Plan for Forbes Field Army National Guard Base, Kansas Air National Guard* (Principal Investigator; by Kathryn G. Dixon and Benjamin Riggle). Prepared for Massachusetts Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2010b *Integrated Cultural Resource Management Plan for the Jefferson Proving Ground/Jefferson Range, Indiana Air National Guard* (Principal Investigator; by Kathryn Dixon and Melissa Crosby). Prepared for Indiana Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2010c *Integrated Cultural Resource Management Plan for Otis Air National Guard Base - Massachusetts Air National Guard* (Principal Investigator; by Kathryn Dixon and Nathan Workman). Prepared for Massachusetts Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2010d *Preliminary Viewshed Analysis for the Proposed Pepco Holdings, Inc. Mid-Atlantic Power Pathway Project Between the Gateway Converter Station and the Maryland/Delaware State Line in Wicomico County, Maryland* (Principal Investigator; by Roger L. Ciuffo and Kevin F. May). Prepared for Cardno Entrix, Inc.
- 2010e *Site-Specific Environmental Assessment for Veterans Affairs Medical Center (VAMC)* (with Katy Coyle, Lindsay Hannah, and Nathanael Heller). Submitted by AECOM to the Department of Veterans Affairs.
- 2011a *Integrated Cultural Resource Management Plan for the 179th Airlift Wing/Mansfield Lahm Airport - Ohio Air National Guard* (Principal Investigator; by Kathryn Dixon, Jennifer Evans, and Melissa Crosby). Prepared for Ohio Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2011b *Integrated Cultural Resource Management Plan for the Selfridge Air National Guard Base - Michigan Air National Guard* (Principal Investigator; by Katherine E. Grandine and Kathryn Dixon). Prepared for Michigan Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2011c *Navy Ammunition and Explosives Storage During World War II and the Cold War Era. Site Report: Naval Weapons Station Seal Beach, Seal Beach, California and Detachment Fallbrook, Fallbrook, California* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011d *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) - Site Report: Marine Corps Base, Quantico, Virginia* (Principal Investigator; by Melissa Crosby and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.

- 2011e *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) - Site Report: Naval Training Center Great Lakes, Illinois* (Principal Investigator; by Melissa Crosby, Dean Doerrfeld, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command.
- 2011f *Navy Ammunition and Explosives Storage During World War II and the Cold War Era. Site Report: Naval Weapons Station Charleston, Charleston, South Carolina* (Principal Investigator; by Katherine Grandine, Dean Doerrfeld, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command.
- 2011g *Navy Ammunition and Explosives Storage During World War II and the Cold War Era. Site Report: Naval Surface Warfare Center, Crane Division, Indiana* (Principal Investigator; by Melissa Crosby and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011h *Navy Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Marine Corps Air Station Miramar, San Diego, California* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011i *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) - Site Report: Naval Air Station North Island California and Naval Amphibious Base Coronado, California* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011j *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) Site Report: Naval Installations in the Hampton Roads Area, Virginia (Naval Station Norfolk, Naval Amphibious Base Little Creek, Naval Air Station Oceana and Dam Neck Annex)* (Principal Investigator; by Kathryn G. Dixon, Melissa Crosby, Dean Doerrfeld, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command.
- 2011k *Gladhill Annexation: Maryland Inventory of Historic Properties Form, 8518 East Patrick Street, Frederick, Maryland* (Principal Investigator; by Kathryn Dixon). Prepared for Frederick Land Company.
- 2011l *Integrated Cultural Resource Management Plan for the 114th Fighter Wing / South Dakota Air National Guard at Joe Foss Field* (Principal Investigator; by Kirsten G. Peeler, M.S., B.A. and Kathryn G. Dixon, B.A.). Prepared for the South Dakota Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2011m *Architectural Investigations at U.S. Army Garrison, Yuma Proving Ground, Yuma County, Arizona* (Principal Investigator; by Kirsten G. Peeler, Jennifer L. Evans, and Kevin F. May). Prepared for U.S. Army Garrison Yuma.
- 2011n *Preliminary Viewshed Analysis for the Proposed Pepco Holdings, Inc. Mid-Atlantic Power Pathway Project Between the Choptank River and the Gateway Converter Station in Dorchester and Wicomico Counties, Maryland* (Principal Investigator; by Roger L. Ciuffo, Benjamin Riggle, and Kevin F. May). Prepared for Cardno Entrix, Inc.
- 2011o *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Ellsworth Air Force Base, Rapid City, South Dakota* (Principal Investigator; by Dean A. Doerrfeld). Prepared for the United States Air Force Center for Engineering and the Environment.

- 2011p *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Wright Patterson Air Force Base, Dayton, Ohio* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011q *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Minot Air Force Base, Minot, North Dakota* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011r *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Lackland Air Force Base, San Antonio, Texas* (Principal Investigator; by Rebecca Gatewood and Dean A. Doerrfeld). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011s *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Kirtland Air Force Base, Albuquerque, New Mexico* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011t *Ammunition and Explosives Storage for the Navy (1939-1989) and the Air Force (1946-1989)* (Principal Investigator; by Dean A. Doerrfeld, Kathryn G. Dixon, Christine Heidenrich, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command and United States Air Force Center for Engineering and the Environment.
- 2011u *Air Force and Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989)* (Principal Investigator; by Dean A. Doerrfeld, Christine Heidenrich, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command and United States Air Force Center for Engineering and the Environment.
- 2011v *Site-Specific Environmental Assessment for Disposition of Veterans Affairs Medical Center (VAMC), 1601 Perdido Street, New Orleans, Louisiana* (with Katy Coyle, Lindsay Hannah, and Nathanael Heller). Submitted by AECOM to the Department of Veterans Affairs.
- 2011w *Phase I Submerged Cultural Resources Investigation for the Terrebonne Basin Shoreline Restoration Whiskey Island Project Item, Terrebonne Parish, Louisiana* (with Troy J. Nowak, Kathryn Ryberg, Katy Coyle and Susan Barrett Smith). Prepared for MWH Americas, Inc., Louisiana Office of Coastal Protection and Restoration, and the New Orleans District, U.S. Army Corps of Engineers.
- 2011x *Mary Hadley Tenant House, MIHP Form No. AL-VI-B-358* (Principal Investigator; by Kathryn Dixon). Prepared for Maryland State Highway Administration.
- 2011y *Clifton-on-the-Monocacy: Nomination to the Frederick County Register of Historic Places* (Principal Investigator; by Kathryn Dixon). Prepared for Mr. and Mrs. Howard Crum.
- 2011z *Architectural Reconnaissance Survey for the Proposed Desert Wind Energy Project, Pasquotank and Perquimans Counties, North Carolina* (Principal Investigator; by Rebecca J. Gatewood and Martha Williams). Prepared for Iberdrola Renewables.

- 2011zl "Studying and Evaluating the Built Environment" in *A Companion to Cultural Resource Management* ed. Thomas F. King. (United Kingdom: Wiley-Blackwell, 2011).
- 2012a *An Historic Context for NASA's Goddard Space Flight Center* (Principal Investigator; by Kirsten Peeler and Travis Shaw). Prepared for Parsons Infrastructure and Technology Group.
- 2012b *Architectural Reconnaissance Survey for the Tuscarawas Gas Processing Plant, Tuscarawas County, Ohio* (Principal Investigator; with Benjamin Riggle, Katherine Grandine, and Jennifer Evans). Prepared for El Paso Midstream, Inc.
- 2012c *Integrated Cultural Resource Management Plan for Kingsley Field Air National Guard Base - Oregon Air National Guard* (Principal Investigator; by Kathryn Dixon and Melissa Crosby). Prepared for the Oregon Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2012d *Integrated Cultural Resource Management Plan for the 148th Fighter Wing / Minnesota Air National Guard at Duluth International Airport Guard* (Principal Investigator; by Kathryn Dixon, Kirsten Peeler, and Melissa Crosby). Prepared for the Minnesota Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2012e *Integrated Cultural Resource Management Plan for Shepherd Field Air National Guard Base - West Virginia Air National Guard* (Principal Investigator; by Kathryn Dixon and Roger Ciuffo). Prepared for the West Virginia Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2012f *Integrated Cultural Resource Management Plan for the 166th Airlift Wing / Delaware Air National Guard at New Castle Airport* (Principal Investigator; by Kathryn Dixon and Melissa Crosby). Prepared for the Delaware Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2012g *Campus-Wide Architectural Survey, Goddard Space Flight Center* (Principal Investigator; by Kirsten Peeler) Draft Technical Reports prepared for Parsons Infrastructure & Technology Group, Inc.
- 2012h *Architectural Investigations – NASA Goddard Space Flight Center (PG4-19)* (Principal Investigator; by Kirsten G. Peeler, Travis F. Shaw, Rebecca J. Gatewood, and Kathryn G. Dixon). Prepared for Parsons Infrastructure & Technology Group.
- 2012i *Rucker Park Historic Landscape and Structures Survey, Fort Sill Oklahoma* (Principal Investigator; by Rebecca J. Gatewood). Prepared for PaleoWest Archaeology.
- 2012j *Rucker Park Management Plan, Fort Sill, Oklahoma* (Principal Investigator; by Lindsay S. Hannah). Prepared for PaleoWest Archaeology.
- 2012k *Cultural Resource Survey Stage 1A Report, Newtown Creek, New York* (Principal Investigator; Stephen Schmidt, David McCullough, Kathryn Ryberg, Kathryn Kuranda). Prepared for Anchor QEA.
- 2012l *Woodstock College Maryland Inventory of Historic Properties and Determination of Eligibility Forms (BA-7), Baltimore County, Maryland* (Principal Investigator; by Katherine Grandine and Benjamin Riggle). Prepared for PBDewberry.

- 2012m *History of Air Force Civil Engineering 1907 – 2010*. Draft manuscript prepared for the Air Force Civil Engineering Support Agency (Principal Investigator with Katherine Grandine and Rebecca Gatewood). Prepared for USAMRAA.
- 2013a *Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Giles County Project, Summers and Monroe Counties, West Virginia, and Giles County, Virginia* (Principal Investigator; by Rebecca Gatewood and Jennifer Evans). Prepared for CH2M HILL.
- 2013b *Curation Needs Assessment for Archeological Collections, Archival Documents, and Buildings 326 and 438, Fort Sill, Oklahoma* (Principal Investigator; with Nathanael Heller and Michael Proffitt, AIA). Prepared for All Consulting, Inc.
- 2013c *199 Baughmans Lane Maryland Inventory of Historic Properties Form, Frederick County, Maryland*. (Principal Investigator with Katherine Grandine) Prepared for the Conley Family Limited Partnership, Frederick, Maryland.
- 2013d *Lewis J. Martz House (F-3-259) and Angleberger Farm (F-3-260) Maryland Inventory of Historic Properties Forms, Frederick County, Maryland* (Principal Investigator; with Katherine Grandine and Jennifer Evans). Prepared for Christopher Crossing, Hogan Companies, Annapolis, Maryland.
- 2013e *Integrated Cultural Resources Management Plan for NASA Goddard Space Flight Center* (Principal Investigator; by Kirsten G. Peeler). Prepared for Parsons Infrastructure & Technology Group.
- 2013f *Proposed Manor at Holly Hills, 24 MIHP Form Addenda and 5 new MIHP Forms* (Principal Investigator; by Rebecca Gatewood, Jennifer Evans, Travis Shaw, Katherine Grandine, Kathryn Dixon, and Kirsten Peeler). Prepared for the Manor at Holly Hills and Landsdowne Development Group, LLC.
- 2013g *Frederick County Register of Historic Places Nomination Form for Trout Run and Supporting Documentation* (Principal Investigator; by Rebecca Gatewood and Katherine Grandine). Prepared for Church of Scientology.
- 2013h *Maryland Inventory of Historic Properties form for Cadillac Motel (PA:85A-81)* (Principal Investigator; by Kirsten Peeler). Prepared for Angela Patel.
- 2013i *Determination of Eligibility Form for Clinton Street Pier (B-5268)* (Principal Investigator; by Kirsten Peeler). Prepared for KCI Technologies, Inc. for Maryland Port Administration.
- 2013j *Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Giles County Project, Summers and Monroe Counties, West Virginia, and Giles County, Virginia* (Principal Investigator; by Rebecca Gatewood). Prepared for CH2M Hill Engineers, Inc.
- 2013k *Historic Preservation Analysis: Melford, Prince George's County, Maryland* (Principal Investigator; with Rebecca J. Gatewood). Prepared for St. John Properties, Inc.
- 2014a *Architectural Investigations HPO # 13-0145-Preferred Alignment between Mile Posts 1.9 and 9.0, Gloucester County, New Jersey* (Principal Investigator; by Katherine E. Grandine). Prepared for Columbia Gas Transmission Co.

- 2014b *West Virginia Historic Property Inventory Form, Files Creek Compressor Station, Randolph County, West Virginia* (Principal Investigator; by Rebecca Gatewood and Jennifer Evans). Prepared for Natural Resource Group, LLC.
- 2014c *Fort Belvoir Railroad Bridge, HAER No. VA-141* (Principal Investigator; by Kirsten Peeler). Prepared for A. Morton Thomas & Associates, Inc.
- 2014d *Naval Proving Ground Indian Head, Charles County, Maryland – NPS Project #1750, Historic American Engineering Record (HAER) Report (HAER No. mD-179; MIHP No. CH-371)* (Principal Investigator; by Rebecca Gatewood, Roger Ciuffo, and Benjamin Riggle). Prepared for Eastern Research Group, Inc.
- 2014e *Indian Head Wayside Exhibit Panel* (Principal Investigator; by Rebecca Gatewood and Kristopher West). Prepared for Eastern Research Group, Inc.
- 2014f *Architectural Survey in Support of Columbia Gas Transmission Line 3664 Replacement Project, Wayne Township, Greene County, Pennsylvania* (Principal Investigator with Michael Hornum; by Rebecca Gatewood). Prepared for CESO, Inc.
- 2015a *Historic Assessment National Institute of Standards and Technology Gaithersburg, Maryland* (Principal Investigator; by Kirsten G. Peeler). Prepared for Metropolitan Architects & Planners on behalf of the National Institute of Standards and Technology.
- 2015b *Determination of Eligibility Form for North Gay Street Survey Area B-5283* (Principal Investigator; by Rebecca Gatewood and Jennifer Evans). Prepared for Baltimore Development Corporation.
- 2015c *Preliminary Cultural Resources Investigations – Monrovia Town Center, Frederick County, Maryland* (Principal Investigator; by Kirsten Peeler and Kathleen Child). Prepared for Stanley Business.
- 2015d *Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Leach Xpress Project, Marshall and Wayne Counties, West Virginia* (Principal Investigator; by Rebecca Gatewood). Prepared for Columbia Gas Transmission, LLC.
- 2015e *Addendum to Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Leach XPress Project, Marshall and Wayne Counties, West Virginia* (Principal Investigator; by Katherine E. Grandine). Prepared for Columbia Gas Transmission, LLC.
- 2015f *Addendum to Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Leach XPress Project, Fairfield, Hocking, Jackson, Lawrence, Monroe, Morgan, Muskingum, Noble, Perry, and Vinton Counties, Ohio* (Principal Investigator; by Katherine E. Grandine). Prepared for Columbia Gas Transmission, LLC.
- 2015g *Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC WB XPress Project in Fairfax, Loudoun, Shenandoah, and Warren Counties, Virginia* (Principal Investigator; by Katherine Grandine and Kevin May). Prepared for Natural Resource Group.
- 2015h *Architectural Investigations for the Proposed Line 8012 Replacement Project, Mineral County, West Virginia* (Principal Investigator; by Katherine Grandine). Prepared for ARCADIS U.S., Inc.

- 2015i *Maryland Inventory of Historic Properties form for Lake Linganore, Frederick County, Maryland* (Principal Investigator; by Kirsten Peeler). Prepared for Jason Wiley Oakdale (Elm Street) Development.
- 2015j *National Register of Historic Places Nomination Form for Marenka House, Prince George's County, Maryland* (Principal Investigator; by Kirsten Peeler). Prepared for MNCPPC.
- 2016a *Historic Assessment Department of Commerce Boulder Laboratories for National Institute of Standards and Technology Boulder, Colorado* (Principal Investigator; by Rebecca J. Gatewood, Katherine E. Grandine, and Kirsten G. Peeler). Prepared for National Institute of Standards and Technology on behalf of Metropolitan Architects & Planners.
- 2016b *Architectural Investigation for the Proposed Columbia Gas Transmission, LLC WB XPress Project in Braxton, Clay, Grant, Hardy, Kanawha, Pendleton, Randolph, and Upshur Counties, West Virginia* (Principal Investigator; by Katherine Grandine). Prepared for Natural Resource Group.
- 2017a *Architectural Reconnaissance Survey for the Spirit Lake Remediation Project in Duluth, St. Louis County, Minnesota* (Principal Investigator; by Samuel Young, Molly Soffietti, Kevin F. May, and Paul A. Demers). Prepared for EA Engineering, Science, and Technology, Inc., PBC.
- 2017b *Determination of Eligibility Form for Grace Trinity United Church of Christ* (Principal Investigator; by Kirsten Peeler and Molly Soffietti). Prepared for Hogan Companies.
- 2017c *Determination of Eligibility form for Sunnymead, Frederick County, Maryland* (Principal Investigator; by Kirsten Peeler and Molly Soffietti). Prepared for Hogan Companies.
- 2017d *National Register Nomination for Moody House, New Haven County, Connecticut* (Principal Investigator; by Lindsay Hannah). Prepared for CT SHPO.
- 2017e *National Register Nomination Orange Street Historic District Extension Connecticut* (Principal Investigator; by Lindsay Hannah). Prepared for CT SHPO.
- 2017f *National Register Nomination NH: Middlesex County, Connecticut* (Principal Investigator; by Kirsten Peeler). Prepared for CT SHPO.
- 2017g *State Historic Resource Inventory Report, Shippan, Stamford, Fairfield County, Connecticut* (Principal Investigator; by Jill Enersen, Kelly Morgan, Alison Hill, Samuel Young, and Molly Soffietti). Prepared for CT SHPO.
- 2017h *State Historic Resource Inventory Report, Kelsey Point, Clinton, Middlesex County, Connecticut* (Principal Investigator; by Jill Enersen, Scott Goodwin, and Molly Soffietti). Prepared for CT SHPO.
- 2017i *State Historic Resource Inventory Report, Hawk's Nest Beach, Old Lyme, New London County, Connecticut* (Principal Investigator; by Jill Enersen and Scott Goodwin). Prepared for CT SHPO.
- 2017j *State Historic Resource Inventory Report, Stonington Borough, Stonington, New London County, Connecticut* (Principal Investigator; by Jill Enersen, Kelly Morgan, and Scott Goodwin). Prepared for CT SHPO.

- 2017k *State Historic Resource Inventory Report, Old Park Housing Development, Stamford, Fairfield County, Connecticut* (Principal Investigator; by Kelly Sellers Wittie and Jill Enersen). Prepared for CT SHPO.
- 2017l *State Historic Resource Inventory Report, The Cove, Stamford, Fairfield County, Connecticut* (Principal Investigator; by Jill Enersen, Scott Goodwin, and Alison Hill). Prepared for CT SHPO.
- 2017m *State Historic Resource Inventory Report, Cornfield Point, Old Saybrook, Middlesex County, Connecticut* (Principal Investigator; by Jill Enersen, Susan Barrett Smith, Scott Goodwin, Alison Hill, and Samuel Young). Prepared for CT SHPO.
- 2017n *Due Diligence Study for Seven Buildings in North Rockville, Montgomery County, Maryland* (Principal Investigator; by Alison Hill). Prepared for 1788 Holdings.
- 2017o *Survey and Report on the History and Significance of the Railroad System and Rolling Stock, Naval Support Facility Indian Head Indian Head, Charles County, Maryland* (Principal Investigator; by Roger L. Ciuffo). Prepared for Eastern Research Group.
- 2018a *Historic Resource Resiliency Planning in Connecticut* (Principal Investigator; with R. Christopher Goodwin, Scott R. Choquette, Noah Slovin, and David Murphy). Prepared for CT SHPO.
- 2018b *National Register Nomination for Dixwell Avenue Congregational United Church of Christ, New Haven, Connecticut* (with Kirsten Peeler and Scott Goodwin). Prepared for CT SHPO.
- 2019a *A Presentation of New Information to Support Reconsideration of the Talbott House (HD-17) Designation by the Mayor and City Council Under the City of Gaithersburg - Code Section 24-226 Designation and Designation Removal of Historic Districts and Historic Sites* (Principal Investigator; by Samuel Young, B.F.A.). Prepared for Halici, Inc.
- 2019b *Historic Preservation and Resiliency Planning in Connecticut – Strengthening state and local plans in an era of climate change* (Principal Investigator; with R. Christopher Goodwin, Scott R. Choquette, Noah Slovin, and David Murphy). Prepared for CT SHPO.
- 2019c *Resilient Stewardship: Preserving Your Historic Property in an Era of Climate Change* (Principal Investigator; with Samuel Young). Prepared for CT SHPO.
- 2019d *Summary Report of Viewshed Study for Proposed Tower on Southwest Area, US Army Ft. Belvoir, Fairfax Co., VA to Support Section 106 Consultation with the VDHR and Other Consulting Parties* (Principal Investigator; by Katherine E. Grandine). Prepared for CybEx LLC.
- 2020a *Newtown Manor Charette Process on Future Building Use*. Prepared with Lawrence Abell and Associates, LTD and Katherine Grandine. Prepared for the Archdiocese of Washington, D.C.
- 2020b *Historic Assessment National Institutes of Standards and Technology Radio Transmitter Facilities Fort Collins, Colorado and Kekaha, Hawaii* (Principal Investigator; by Samuel Young). Prepared for National Institute of Standards and Technology on behalf of Metropolitan Architects & Planners.
- 2020c *Historic Preservation Treatment and Maintenance Plan (HPTMP), San Francisco Veterans Affairs Medical Center (SFVAMC)*. Teamed with Patriot Design LLC for Department of Veterans Affairs, VA Sierra Pacific Network (VISN 21).

- 2021a *Historic Preservation Treatment Plan, Antietam National Battlefield, Visitor Center Rehabilitation* (Principal Investigator; by Kirsten Peeler). Prepared for John C. Grimberg Co., Inc.
- 2021b *Army Inter-War Era Housing Historic Context (1919-1940)* (Principal Investigator; by Kirsten Peeler and Katherine Grandine). Prepared for U.S. Department of the Army.
- 2021c *Cultural Resources Report and Cultural Analysis Sections for the Environmental Assessment for Installation Development at Arnold Air Force Base, Tennessee* (with Jeffrey Maymon and Katherine Grandine). Prepared for Vernadero Group, Inc., and the Department of the Air Force.
- 2022a *Historic Context for Army Vietnam War Era Historic Housing, Associated Buildings and Structures, and Landscape Features (1963-1975)* (Principal Investigator; with Kirsten Peeler, Katherine Grandine, Samuel Young, and Molly Soffiatti). Submitted to the Office of the Assistant Secretary of the Army for Installations, Energy and Environment. Submitted by Cherokee Nation Management and Consulting, LLC.
- 2022b Revised National Register nomination and ICRMP for Arlington National Cemetery (Principal Investigator; with Kirsten Peeler and Molly Soffiatti). Prepared for JESCO/GSRC Joint Venture 2024.
- 2022c *NAVFAC Washington, Naval Medical Clinic Complex Historic Structures Report: U.S. Naval Academy, Annapolis, MD* (with Samuel Young). Prepared for JESCO/GSRC Joint Venture.
- 2022d *NSF Dahlgren Ammunition Handling Area Historic Context, King George County, Virginia* (Principal Investigator; with Katherine Grandine and Molly Soffiatti). Prepared for JESCO/GSRC for Naval District Washington, D.C.
- 2022e 420 East Patrick Street, Frederick, Maryland, Maryland Inventory of Historic Properties Form. (Principal Investigator; with Katherine Grandine). Prepared for Ausherman Properties.
- 2022f *Coastal Virginia Offshore Wind Commercial Project. Construction and Operations Plan, Appendix H-1: Historic Resources Visual Effects Analysis* (Principal Investigator; with Molly Soffiatti and Samuel Young). Prepared for Dominion Energy through Tetra Tech.
- 2022g Memorandum on House at 7997 Point Pleasant Road, West Virginia Historic Property Inventory Form JA-0360: Ravenswood House (Principal Investigator; with Katherine Grandine). Prepared for Western EcoSystems Technology, Inc.
- 2022h 220 North East Street, Frederick, Maryland, Maryland Inventory of Historic Properties Form (Principal Investigator; with Katherine Grandine). Prepared for Ausherman Properties.
- 2023a Potomac Jobs Corps Center DC State Historic Preservation Office Determination of Eligibility Form (Principal investigator: with Katherine Grandine and Alan Gibson). Prepared for Parsons Government Services, Inc., on behalf of the U.S. Department of Labor, Washington, D.C.
- 2023b *Built Resources Investigations for Onshore Components of the Maryland Offshore Wind Project at Sussex County, Delaware, and Worcester County, Maryland* (Principal Investigator; with Samuel H.

- Young and Kristopher West). Prepared for US Wind, Inc.
- 2023c *Fort Leavenworth Pre-1919 Historic Housing Alternatives Analysis - Fort Leavenworth National Historic Landmark District* (Principal Investigator; with Samuel H. Young). Prepared for Ft. Leavenworth Frontier Heritage Communities.
- 2023d *Hurricane Laura Jefferson Davis Electric Cooperative (JDEC) Repair and Restoration Program Project Area in Calcasieu and Cameron Parishes, LA*. Prepared for Royal Engineering for submission to the Federal Emergency Management Agency.
- 2023e Historic American Engineering Record (HAER) Old River Lock Gantry Crane HAER No. LA-52, Lettsworth, Point Coupee Parish, Louisiana (with Molly Soffietti).
- 2023f *Phase II Historic Architectural Investigations, Phase I Archaeological Survey, and Phase II Archaeological Evaluation of Sites 44FV0276, 44FV0278, 44FV0280, and 44FV0282 for the James River Water Supply Project, Fluvanna County, Virginia* (with Mike Hornum, Colby Child, Daniel Hays, Amanda Melton, Katherine Grandine, Alan Gibson, and Martha Williams). Prepared for James River Water Authority, Palmyra, VA.
- 2023g *Environmental Resource Reports and National Environmental Policy Act (NEPA) Compliance for the Perry Point Community Living Center (CLC), Perryville, Maryland: CLIN 006: Cultural and Archaeological Resource Survey/Section 106 Consultation Support* (Principal Investigator: with Katherine Grandine). Prepared for Mabbett and the Department of Veteran Affairs. Revised for new location 2024.
- 2023h City of Frederick Historic Preservation Commission Consultation Documentation for 69 and 77 South Market Street, Frederick, Maryland (Principal Investigator; with Samuel Young). Prepared for Ausherman Properties.
- 2023i City of Frederick Historic Preservation Commission Consultation Documentation for 437 North Market Street, Frederick, Maryland (Principal Investigator; with Shannon Baker). Prepared for Steam Bakery 437, LLC.
- 2024a *Phase I Architectural Survey for Lake Anna Technology Campus, Louisa County, Virginia* (Principal Investigator; with Samuel Young, and Shannon Baker). Prepared for Ramboll.
- 2024b *Phase I Architectural Survey for the Phase II Development of the Ravenswood Solar Project, Jackson County, West Virginia (FR #23-0785-JA)* (Principal Investigator; with Katherine Grandine, Samuel Young, Shannon Baker, Amanda Bentz, and Zachary Salmon). Prepared by Goodwin & Associates, Inc., for Western EcoSystems Technology Inc., Concord, NH and Lemoyne, PA.
- 2024c Arlington National Cemetery and Soldiers' and Airmen's Home National Cemetery Integrated Cultural Resources Management Plan (ICRMP). Prepared for Mendez.
- 2024d *MIHP Form for Winchester House (127 E 6th Street), City of Frederick, Frederick County, Maryland* (Principal Investigator; with Shannon Baker). Prepared for Maher Kalajian.
- 2024e Historical support for the Carroll Creek Project, The Wormald Companies (Principal Investigator; with Shannon Baker). Prepared for The Wormald Companies.

- 2024f City of Frederick Historic Preservation Commission Consultation Documentation for 69 and 77 South Market Street, Frederick, Maryland (Principal Investigator; with Samuel Young). Prepared for Ausherman Properties.
- 2024g *MIHP Form for Benjamin Hall House (F-5-25), Frederick County, Maryland* (Principal Investigator; with Kirsten Peeler and Shannon Baker). Prepared for Elm Street Development.

Exhibit 3

Comsat Property



CBRE, Inc.
1900 N Street, NW | 7th Floor
Washington, DC 20036

+1 202 585 5544 Tel

www.cbre.com

Date: January 21, 2025

To: Historic Preservation Commission
c/o Montgomery County Planning Department
2425 Reedie Drive, Floor 13
Wheaton, MD 20902

From: **Tommy Cleaver**
Executive Vice President
CBRE | Life Sciences Mid-Atlantic
Leader

Dear Members of the Historic Preservation Commission:

Our firm, CBRE Group Incorporated (CBRE), the world's largest commercial real estate services firm, has been actively involved in the representation and leasing of Lantian Development's Comsat property since 2021.

My team is widely regarded as the leader in the Office and Life Science space with 72% market share and over \$3B worth of transactions since 2021, including deals with AstraZeneca, GlaxoSmithKline, Emergent Bio, Illumina, Charles River Labs, NIH, NIC, among many others.

We took this assignment because of our conviction in its potential. Comsat is a rare property encompassing over 200 acres in coveted Montgomery County with over 3,600 feet of I-270 frontage. Properties of this scale and size rarely exist and are in high demand due to their flexibility and potential for large scale development. Despite a long list of accolades, the Comsat property has remained vacant for over 20 years. This stagnation is not due to a lack of interest; or the absence of effort from either Lantian or CBRE.

Since CBRE was engaged, the property has remained a top priority for our team. We have submitted the site for 6 formal national solicitations and presented to over 50 additional Fortune 500 companies and large-scale privately held life science users – virtually all have expressed sincere interest.

While these contemplated transactions vary in their potential outcomes, all would have resulted in material commitments (anywhere from 500,000 to 2,250,000 million square feet of life science space) with \$1B+ of total investment and significant job creation.

In parallel with these efforts, we have spoken with both the prior and current Governors for the State of Maryland, their Commerce teams, as well as the current Montgomery County Executive and MCDC about the potential for this property. We have completed over 20 site tours, custom renderings, concept plans and conducted extensive outreach to market the property globally.

After digesting the feedback from several early site tours, CBRE recommended a comprehensive interior demolition project to facilitate the property visits and enable easier visioning of a repurposed building. Lantian subsequently hired a contractor to perform over \$1 million in select interior demolition to

accommodate this feedback. This accommodation improved the tour experience, but did not solve for the more salient feedback.

During post RFP debriefs, the responses we receive is universal and constant with two overarching themes: (1) End-users are unwilling to purchase or lease a property with encumbrances that could potentially delay or disrupt their development plans and (2) the location of the existing structure is a significant impediment to their desired layouts – simply put, building around it is not a palatable option.

In addition to the feedback cited above, we have studied multiple repurposing scenarios for the existing Comsat building, in whole or in part, and concluded that the financial numbers do not pencil. It is prohibitively expensive to rehabilitate or adaptively reuse into a new facility and creates too much uncertainty about how a transaction could proceed.

Every prospect that we have been in front of views the existing structure as a significant liability. This sentiment was captured by one site selection consultant providing final feedback after eliminating the Comsat site from consideration: “drawbacks of the site such as existing structures that have been abandoned or dormant for many years, and the possible schedule and budget disruption due historical significance of the existing structures offer significant headwinds for final consideration over other available sites within the region.” This same consultant stated: “It is our opinion that the site would score much better in comparison against other similar sites in the region if presented as a clean greenfield option. This would necessitate demolition of existing structures to provide a clean and clear path for development.”

As a result, we strongly believe that the existing building creates an unworkable encumbrance to leasing or significant investment in the property. After four years of empirical feedback, it is clear to us that Fortune 100 companies and large regional users will continue to reject the property until something changes.

The scale and location will remain of interest to the global life sciences community; however, as long as the existing structure and accompanying uncertainty remains (that requires the building to remain), none of these users will commit to anchoring the development.

To best position this site for success and spur significant economic development, new residents, and net-new high paying jobs for Clarksburg, Montgomery County, and the State of Maryland, the building should not be designated historic.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tommy Cleaver', with a long horizontal line extending from the end of the signature.

Tommy Cleaver

Steven A. Robins
Attorney
301-657-0747
sarobins@lerchearly.com

February 13, 2024

VIA ELECTRONIC DELIVERY

Artie Harris, Chair
Montgomery County Planning Board
Maryland-National Capital Park & Planning Commission
2425 Reedie Drive, 14th Floor
Wheaton, MD 20902

Mr. Patrick Butler, Upcounty Planning – Division Chief
Maryland-National Capital Park & Planning Commission
2425 Reedie Drive
Wheaton, MD 20902

Re: Review of County Executive's Recommended FY25 Capital Budget and FY25-30
Capital Improvements Program – Transportation Elements/February 15, 2024 Planning
Board Agenda Item #7

Dear Chair Harris & Mr. Butler:

Our firm represents Lantian Development, the owner of the Comsat Property in Clarksburg. We are working with Lantian on the Clarksburg Gateway Sector Plan and would like to comment on the County Executive's Recommended FY25 Capital Budget and FY25-30 Capital Improvements Program – Transportation Elements as it relates to the Observation Drive Extended (Project P501507). In addition to Observation Drive, we have a significant interest in the proposed I-270 Exit 17 interchange as well as other various transportation/road network matters that would greatly improve connectivity and economic development in the UpCounty.

Lantian's property, which is over 200 acres, is the largest property in the Clarksburg Gateway Sector Plan, comprising approximately 20% of the total plan area. However, when considering the actual developable area of the plan, by removing schools, existing neighborhoods and environmental areas, the property's overall percentage and importance increases substantially. It is undoubtedly the most significant opportunity for the future growth and economic development of Clarksburg and the Upcounty.

Lantian recently transmitted a letter to MCDOT and M-NCPPC specifically outlining its preferences and concerns for the alignment of Observation Drive and its timing as it relates to the

Sector Plan and the CIP. Rather than duplicating our thoughts, I am attaching a copy of the letter (with the attachment) and request that it be placed in the record for this Planning Board agenda item #7. While our property is impacted by Phase II of the Observation Drive Extension project and there seems to be general agreement in delaying Phase II until the completion of the Section Plan, we remain very concerned about Phase I and the need to revise the existing design so that it too will match the alignment contained in the Sector Plan that has yet to be approved. The future alignment of Observation Drive's planned extension and its associated Phase I Design process and timing are critically important to our Property as well as the success of Sector Plan. We also offered our position on the Exit 17 Little Seneca/I-270 interchange that currently is recommended in the existing Clarksburg Master Plan and is being carried forward in the pending Sector Plan.

We appreciate your consideration of the attached correspondence and our thoughts herein as you deliberate on this item. Thank you for your continued consideration of our concerns and thoughts as it relates to the Observation Drive alignment and its design timing.

Sincerely,

LERCH EARLY & BREWER, CHTD.



Steven A. Robins

Enclosures: Letter from Robert Elliott, CEO of Lantian Development

cc: Robert Elliott, CEO Lantian Development
Mike Alexander, Lantian Development
Marilyn Balcombe, Montgomery County Council
Christopher Conklin, Director MCDOT
Jason Sartori, Planning Director
Robert Kronenberg, Deputy Planning Director
David Anspacher, Acting Chief, Countywide Planning & Policy Division
Stephen Aldrich, PE, Countywide Planning & Policy Division
Gary Unterberg, Rodgers Consulting
Vincent G. Biase, Esq.

January 30, 2024

VIA ELECTRONIC DELIVERY

Mr. Patrick Butler, Upcounty Planning – Division Chief
Maryland-National Capital Park & Planning Commission
2425 Reedie Drive, 14th Floor
Wheaton, MD 20902

Mr. Christopher Conklin, Director
Montgomery County Department of Transportation
101 Monroe Street, 10th Floor
Rockville, MD 20850

Re: Alignment of Observation Drive Extension & Proposed Phase I Design Timing

Dear Mr. Butler & Mr. Conklin:

I am writing this letter as the CEO of Lantian Development and owner of the Comsat Property in Clarksburg to follow-up on our most recent meeting on January 10, 2024, as well as numerous other meetings regarding the proposed alignment of the Observation Drive extension. As you know, on many occasions since we acquired the property in 2015, we have also discussed the proposed I-270 interchange, proposed Exit 17 - Little Seneca Parkway/Newcut Road, that will be located on the Comsat Property and other various transportation/road network matters.

The Comsat Property is over 200 acres along the east side of the I-270 Technology Corridor, with over 3600 linear feet of frontage. As the largest property located within the boundaries of the proposed *Clarksburg Gateway Sector Plan*, the Comsat Property's future development represents a significant opportunity for the future growth and economic development of Clarksburg, the Upcounty, and Montgomery County as a whole. The future alignment of Observation Drive's planned extension and its associated Phase I Design process are not only critically important to the Comsat Property, but to the future growth and sustainable development of Clarksburg and the Upcounty.

During our recent January 11, 2024 meeting at M-NCPPC, Lantian expressed its preference for a longer Phase I Design process to fully study and, ultimately, implement an optimal revised alignment for Observation Drive. Lantian has repeatedly conveyed its concern with the pace of Phase I Design to M-NCPPC and MCDOT in previous meetings

over that past several months, most recently with your respective teams on January 10, 2024 as well as additional meetings held on (1) January 11, 2024 with County Executive Marc Elrich, (2) November 9, 2023 at MCDOT, (3) October 4, 2023 virtually with M-NCPPC, (4) September 18, 2023 with M-NCPPC at the Comsat Property, and (5) July 21, 2023 with M-NCPPC and County Councilmember Marilyn Balcombe at the Comsat Property.

Pursuant to the County Executive's recently published "Recommended FY25 Budget," Phase I Design of the Observation Drive extension is funded for the near-term and scheduled for completion in FY27. While Lantian is pleased to learn that designing the Observation Drive extension is a funding priority, we reiterate our concern that the anticipated timeline is problematic given the universal recognition that the current alignment will undoubtedly need to be modified as part of the ongoing sector planning process. As we discussed during our recent meeting, the current Observation Drive extension alignment poses significant environmental issues and does not properly align the road through the Comsat Property and surrounding communities to I-270. As such, the Phase I Design will need to be revised — particularly in the area north of West Old Baltimore Road—to realign Observation Drive out of environmental stream valley area and buffer, providing significant environmental benefit. This realignment will ultimately result in Observation Drive shifting west to become an extension of existing "Gateway Center Drive" – a change which all parties seem to universally support. This realignment, particularly in the vicinity of West Old Baltimore Road and continuing north through our property, will help provide for a more efficient connection to I-270 along Little Seneca Parkway (Please see the enclosed Observation Drive Exhibit showing the existing and proposed realignment). These modifications cannot be implemented if the Phase I Design proceeds on its current timeline and will require a redesign once the Sector Plan is adopted by the Council. At present, it seems like Observation Drive is moving forward "just to move forward" without taking into consideration the significant work that will be done as part of the Sector Plan process.

While we anticipate future scheduled coordination meetings with M-NCPPC and MCDOT, we are submitting this letter to formally express our concern regarding the timing and alignment of the Phase I Design of Observation Drive due the challenges the current alignment will pose for portions of the road north of West Old Baltimore Road as well as Phase II Observation Drive. While we want to support the County's decision to design and implement Phase I Design completion in FY27, we cannot in good conscious do so unless there are funding provisions made to address a realignment now as part of this

current funding. Without realignment, the County's design of Observation Drive will proceed, wasting funds on an alignment that will be in stark contradiction to the Sector Plan. It is critical that we allow for enough time for M-NCPPC and MCDOT to comprehensively study alternative alignments and make necessary changes to address issues with the current alignment. To this end, Lantian believes that the scope and timetable for the Phase I Design should be reconciled with timing of the Sector Plan process. The ongoing Sector Plan update provides the appropriate forum and timeline for M-NCPPC, MCDOT, the Clarksburg community, and other important stakeholders to produce the optimal alignment for Observation Drive – something that all stakeholders appear to agree should happen.

Thank you for your continued consideration of our concerns as it relates to the Observation Drive alignment and its design timing. We very much appreciate the collaborative efforts your teams have taken to understand these issues and look forward to continuing this productive dialogue with M-NCPPC and MCDOT throughout the planning and design processes.

Sincerely,

A handwritten signature in black ink that reads "Bob Elliott".

Bob Elliott
Chief Executive Officer

Enclosures: January 2024 Observation Drive Exhibit (Comsat Property)

Cc: Marc Elrich, County Executive, Montgomery County
Marilyn Balcombe, Montgomery County Councilmember – District 2
Artie Harris, Chair, Montgomery County Planning Board
Jason Sartori, Planning Director, Montgomery County
Robert Kronenberg, Deputy Planning Director, Montgomery County
Steven A. Robins, Lerch Early and Brewer
Gary Unterberg, Rodgers Consulting



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To: [MCP-Chair](#)
Subject: Testimony - Clarksburg Gateway Sector Plan Public Hearing, Sep 25,
Date: Friday, September 19, 2025 12:47:27 PM
Attachments: [FOTMC Testimony to Planning Board, Clarksburg Sector Plan^J Sep2025.docx](#)

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Submitted by John Parrish on behalf of The Friends of Ten Mile Creek and Little Seneca Reservoir.
Thank you.

~



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.

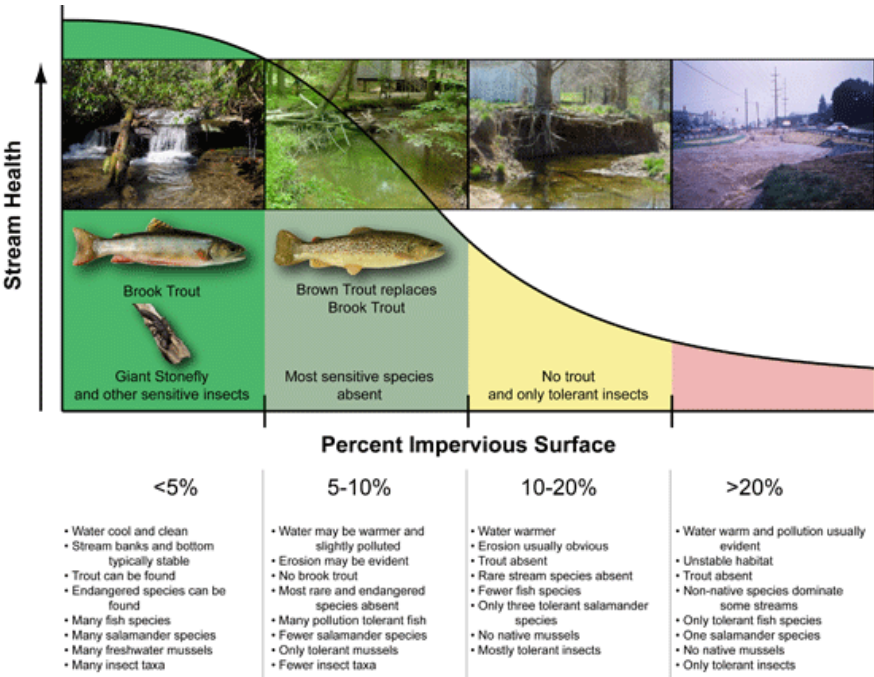
Regardless of whether the COMSAT building is preserved, we do not support turning the COMSAT Property into a major regional destination point with an excessive amount of housing, retail, dining and additional roads. Such extensive development would destroy forests, substantially increase impervious surface 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



From: [William Sheehan](#)
To: [MCP-Chair](#)
Subject: September 25 Clarksburg Master Plan Public Hearing
Date: Monday, September 22, 2025 4:00:33 PM

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Dear Planning Board Chair:

Please accept this written testimony on the subject of the Clarksburg Gateway Sector Plan, which I understand will be considered at the September 25 hearing identified above.

I support the views on the Sector Plan expressed by The Friends of Ten Mile Creek and Little Seneca Reservoir.

I have lived in Montgomery County at the address below for 42 years. I strongly support the preservation of our natural resources and endorse the stewardship principles endorsed and practiced by The Friends of Ten Mile Creek.

Sincerely,

William F. Sheehan



From: [rg steinman](#)
To: [MCP-Chair](#)
Subject: Testimony on Clarksburg Gateway Sector Plan, Sep 25, 2025
Date: Monday, September 22, 2025 4:13:29 PM
Attachments: [RG Steinman oral Testimony to Planning Board, Clarksburg Sector Plan^J Sep2025.docx](#)

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Please find my attached testimony for the Clarksburg Gateway Sector Plan hearing, September 25, 2025.
Thank you,
~ rg Steinman

Good afternoon. My name is rg Steinman. I serve on the Board of Friends of Ten Mile Creek and Little Seneca Reservoir. I am in full support of FOTMC's testimony on the Clarksburg Gateway Sector Plan (CGSP).

The purpose of FOTMC was set out in our bylaws in 2015: "...to serve as guardians of Ten Mile Creek and its watershed, preserving and protecting this unique place and to protect the water quality of Little Seneca Reservoir as a regional water supply and recreational resource."

FOTMC – owns 52-acres of property, entirely in a forest conservation easement, on either side of Ten Mile Creek, which is a sub-watershed of the Little Seneca Reservoir (LSR). Being landowners and caretakers in this special watershed has amplified our mission to protect the health of the streams that flow into Little Seneca Reservoir, the back-up drinking water supply for 5 million people in the Washington DC region.

Three 3 major streams drain into the LSR: Little Seneca Creek, which flows through the Clarksburg Sector Plan, Is the largest of the 3 drainages; Ten Mile Creek, the 2nd largest and the cleanest stream; and Cabin Branch Creek, whose open fields and farmland have been obliterated by a huge housing development, with more housing on the way. The Cabin Branch development has resulted in sediment loads into the creek, nutrient pollution from lawn fertilizers, etc. and a silted forebay where the Microcystin toxin has been documented (2020).¹

I bring this up because **the CGSP will have an impact on Little Seneca Creek, the largest stream that flows into the Reservoir.**

The CGSP is located entirely within the Clarksburg SPA: "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).

Based on DEP data, stream water quality has been declining in the Clarksburg SPA since development began in earnest in 1998. At the time of the 1994 Clarksburg Master Plan, all the streams in the Clarksburg SPA were in Good and Excellent condition. In 2020, the streams' conditions declined to Good and Fair. None was rated Excellent.

**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.
How will this plan do better to improve the stream health, or at least not let it deteriorate further?**

The best way to protect and restore the health of the streams and to ensure a clean drinking water supply is to, first and foremost, preserve forests, and limit the extent of development and utilize existing roads.

There are 285 acres of forest occurring within the 969-acre sector plan boundary, nearly all of which are **State-designated 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 purpose of the Priority Urban Forest designation will not be achieved.**

The Sector Plan can protect these forests by avoiding the construction of new roadways through forests, parks, streams, stream valleys, and wetlands and by limiting development – and hence limiting impervious surface area – on the 200-acre site of the historic COMSAT building. There are 4 large forest groves on the COMSAT site. These forested areas are State-designated Priority Urban Forests. There is sufficient open space on this property such that any development plans (roads, houses, etc) can avoid impacting the COMSAT forest groves. Such an approach would be in harmony with the Sector Plan's **compact community** vision, rather than an outdated regional hub vision. Scaling back the extent of development would also contribute to reducing congestion on the roads.

These Earth-friendly environmental actions – protecting forest, limiting the extent of development, and utilizing existing roads are critical not just to safeguarding water quality, but also to 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.

¹ 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.



Email

For the Public Record ...

Owner



Email

Regarding



For the Public Record - Clarksburg Sector Plan

Subject

For the Public Record - Clarksburg Sector Plan

From



Amy Presley

To



<MCP-Chair MCP-Chair>;  MCP-Chair@mncppc-mc.org

Cc

Bcc

Date Sent

Date Received

9/26/2025 5:38 PM

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Hi Catherine.

Thank you again for being so accommodating in getting my testimony to the Board prior to the hearing last night. I know how hard your job is and how hard you work and I greatly appreciate it!

Please see the attached supplemental piece of my testimony. Chair Harris asked that I send it to you to be included in the public record together with what I already sent.

**Kind regards,
Amy**

Amy Presley, REALTOR®



www.TrustedEstatePartners.com

Amy Presley



September 24, 2025

Testimony of Amy Presley: Clarksburg Gateway Sector Plan Hearing, September 25, 2025

Introduction & Background

I am a resident of Clarksburg Town Center, where I have lived since 2002. When I chose to move here, I did so after reviewing the **Clarksburg Master Plan** and the Town Center plan. Those documents promised a community that would not simply be a bedroom suburb, but a **balanced live-work-play environment**, supported by new infrastructure and road connections that would relieve pressure on existing local roads and allow the higher density zoning to succeed.

More than 23 years later, I can say with confidence that Montgomery County has not kept its side of that promise. The failure to deliver infrastructure, particularly new roadway connections, has placed constant burdens on residents and forced Clarksburg into being a commuter community rather than the complete town that was promised. The proposed **removal of Exit 17** from the I-270 corridor represents yet another broken promise — one that will permanently undermine the ability of Clarksburg to thrive.

Exit 17 as Keystone Infrastructure

The planned Exit 17 interchange has always been central to making the Clarksburg Master Plan function. It is not about convenience — it is about capacity, safety, and economic competitiveness:

- Without Exit 17, local roads such as Route 355, Stringtown Road, and Snowden Farm Parkway will continue to be overburdened, with spillover traffic creating unsafe conditions.
- The County's own Vision Zero and transit goals will be jeopardized, as planners will be forced to widen intersections instead of investing in multimodal solutions.
- Most importantly, **without direct interstate access**, the COMSAT site cannot attract the caliber of tenants Montgomery County needs — particularly **life sciences firms and their associated office, lab, and support functions**.

By contrast, retaining Exit 17 positions Clarksburg as a competitive, well-connected node along the I-270 Technology Corridor.

The COMSAT Site as Montgomery County's Last, Best Opportunity

The COMSAT property represents over 200 acres under unified ownership, in a location already designated for growth. It is unique in the County's land inventory and provides the last major opportunity to build a truly **mixed-use life sciences campus** with office, residential, retail, and supporting amenities.

Montgomery County has struggled to attract or retain major employers in recent years, losing opportunities to competing jurisdictions in Virginia and elsewhere. We cannot afford to squander the COMSAT site by constraining development acreage to less than 50 acres or by removing the interstate access that employers view as non-negotiable.

The property has the scale to host:

- **Life sciences research and office clusters**, anchoring the Upcounty with high-wage jobs.
- **Retail and restaurants**, finally meeting the long-stated goal of giving residents places to shop and dine without leaving Clarksburg.
- **Housing integrated with jobs**, creating true live-work-play functionality and reducing commute miles.

Montgomery County leaders often speak of economic competitiveness, but this Plan, as currently drafted, risks doing the opposite — strangling one of the few sites that could attract a **Fortune 100-level employer**.

Countywide Economic Impact

The broader **economic stakes** are real:

- Clarksburg is not the only beneficiary; the entire County stands to gain.
- A strong COMSAT development would **expand the tax base**, generate thousands of jobs, and reinforce Montgomery County's reputation as a hub for life sciences and innovation.
- Without it, we will continue to watch companies choose Loudoun County, Fairfax, or Frederick for their expansions — areas that offer both land and highway access.

In short, this is about more than Clarksburg. It is about whether Montgomery County can seize one of its last opportunities to create a competitive employment center in the 21st century economy.

The Pattern of Broken Promises

This debate must be seen in light of past failures. The original Clarksburg Town Center plan included significant commercial capacity, but after the Ten Mile Creek controversy, that capacity was stripped away. As a result:

- The promised office and retail core never materialized.
- A hospital that might have located in Clarksburg instead chose Germantown.
- Residents were left with long commutes and limited local services.

The **removal of Exit 17**, coupled with restrictive land use overlays, would repeat this pattern on a larger scale — permanently foreclosing the chance to deliver the jobs and services that make a community whole.

Requests

Accordingly, I respectfully urge the Planning Board to amend the Clarksburg Gateway Sector Plan to:

1. **Retain Exit 17** as a planned interchange, with phased delivery tied to development milestones.
2. **Reduce excessive land constraints** on the COMSAT site, ensuring sufficient developable acreage for employment and residential uses.
3. **Allow a flexible mix** of uses at COMSAT — including life sciences, office, residential, retail, and educational/medical — with modern environmental safeguards (and without the loss of significant buildable area to unnecessary “tree stands” and ridiculous added setbacks from 270 - a critical view shed for project success).
4. **Require best-in-class sustainability practices** (stormwater, TDM, green buildings) but do not use environmental overlays that to block growth.

Closing

Clarksburg residents like myself bought into a vision. We invested in homes, schools, and community life based on the County’s promise of infrastructure and a balanced town. The COMSAT site is our last chance to fulfill that vision — not only for Clarksburg, but for Montgomery County’s long-term economic future.

I urge you to keep Exit 17 in the plan and unlock COMSAT’s potential as a true life sciences and mixed-use campus. Doing so would restore faith in the County’s planning process and set Clarksburg, and Montgomery County as a whole, on a path to prosperity.

Thank you.

Respectfully,

Amy Presley

Amy Presley

Clarksburg Gateway/COMSAT - Message Map

Clarksburg was upzoned on the promise of infrastructure and comprehensive live-work-play development. Broken promises have prevented that to date. Removing Exit 17 and restricting the COMSAT site weakens Montgomery County's competitiveness and condemns Clarksburg to remain a bedroom community. Don't repeat the past. This is our last chance to get it right!

Pillar 1:

Promises & Reliance

- County planned density relied upon infrastructure like M83 (now eliminated) and Exit 17 to support it.
- Residents bought in and relied on those commitments.
- Removing Exit 17 = another broken promise resulting in even more congestion and unsafe road conditions.

Pillar 2:

Economic Competitiveness

- COMSAT is Montgomery County's last, best site for a life sciences-type campus.
- Interstate access is non-negotiable for employers.
- Clear visibility from I270 is imperative.
- Losing this chance means allowing more jobs & taxes to go to Frederick or Virginia.

Pillar 3:

Balanced Growth

- Past downzoning robbed Clarksburg of commercial density, jobs and services.
- Cutting COMSAT's usable land to ~25% repeats that mistake.
- Balanced stewardship is possible without excessive "tree save" and setback requirements.

"Clarksburg kept our side of the bargain. Please keep the County's side."

"Exit 17 isn't a luxury; it's the backbone element that makes COMSAT viable."

"Clarksburg needs jobs and services to be complete. COMSAT is our last chance!"

1. Retain Exit 17 in the plan, with phased implementation.
2. Adopt the proposed Observation Drive alignment.
3. Reduce excessive land constraints on COMSAT to allow viable, market-ready uses.
4. Entitle a flexible mix — life sciences, office, residential, retail, and educational/medical — supporting best-in-class sustainability.

From: schoapm@aol.com
To: [MCP-Chair](#)
Cc: [Margaret Schoap](#)
Subject: testimony for draft Clarksburg Gateway Sector Plan
Date: Thursday, September 25, 2025 11:06:06 AM
Attachments: [TAME Coalition_M.Schoap_Clarksburg Gateway Sector Plan_testimony_Pl.Bd.hearing_09252025_pdf.pdf](#)

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Planning Board and Planning Staff,

Attached is my testimony for Thurs, Sept 25th public hearing for draft Clarksburg Gateway Sector Plan.

Margaret Schoap
Germantown, MD

Montgomery County Planning Board
Clarksburg Gateway Sector Plan
Public Hearing Testimony

Thursday, September 25, 2025

Good Afternoon, I'm Margaret Schoap and am speaking for the TAME Coalition (Transit Alternatives to Midcounty Highway Extended).

The TAME Coalition supports and has signed on to the testimony of Friends of Ten Mile Creek.

We thank the Planning Commissioners and Planning Staff for removing Midcounty Highway Extended from the Master Plan of Highways and Transitways, because now elected officials and planners can focus on expanding transit and other people-centric travel choices.

We support transit improvements for the residents now living in the Upcounty, and for its population growth in the coming decades. The Clarksburg Gateway Sector Plan needs to center around transit, focused on using existing roadways.

This draft master plan states that transit and people-centric modes are considered first. And we need to see that your decisions follow that priority. As now written, this plan is too focused on building new roads and roadway extensions.

The plan does recommend several transit policies that we support, including: Recommendation 2.a. Improve safe access to bus stops; and 2.b. Ensure stops are adequately sized and are safe places to wait for the bus.

On page 37 of the proposed draft Clarksburg Gateway Sector Plan, it recommends locating "enhanced bus stations" at a number of locations, including two locations on a new proposed roadway: Observation Drive Extended.

We support locating enhanced bus stations including for this part of Clarksburg, but, you are proposing to locate them on a road that does not now exist.

* We ask you to use the existing Comsat Drive roads for the southward extension of Gateway Center Drive. And, we ask you to drop consideration of the northward extension of Observation Drive, south of West Old Baltimore Road.

* We applaud the decision to drop the proposed I-270 interchange with Little Seneca Parkway. Instead of extending Little Seneca Parkway, we ask you to use and enhance, the existing West Old Baltimore Road.

We have by far the most faith and trust in transit plans that are practical, realistic, and achievable in the short term, through using existing roadways for Ride On buses and other county buses.

The existing roadway network is adequate to support improved bus service to this area. Thank you.

From: [Francoise Carrier](#)
To: [MCP-Chair](#)
Cc: [Sartori, Jason](#); [Butler, Patrick](#); [Zeigler, Donnell](#); [Larson, Clark](#); senecaayrtom@aol.com; senecaayrfarms@aol.com; [Soo Lee-Cho](#)
Subject: Linthicum Properties Management comments on Clarksburg Sector Plan
Date: Friday, October 3, 2025 2:31:48 PM
Attachments: [Lett Pl Bd Clarks SP 10-3-25.pdf](#)

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Please accept the attached letter, providing comments from the owner of the Linthicum property, as part of the record on the Public Hearing Draft of the Clarksburg Gateway Sector Plan.

Thank you,

Françoise Carrier



Françoise M. Carrier
Co-Chair, Land Use & Zoning Practice Group
BREGMAN, BERBERT, SCHWARTZ & GILDAY, LLC
7315 Wisconsin Avenue, Suite 800 West
Bethesda, Maryland 20814
301-656-2707 **PHONE** | 301-961-6525 **FAX** | 240-428-4671 **MOBILE** (preferred)
Email: fcARRIER@bregmanlaw.com
www.bregmanlaw.com/

October 3, 2025

Artie Harris, Chair, and Members,
Montgomery County Planning Board
2425 Reedie Drive, 14th Floor
Wheaton, MD 20902

Re: Clarksburg Gateway Sector Plan – Linthicum Property

Dear Chair Harris and Members of the Board:

Please accept these comments on the Public Hearing Draft of the Clarksburg Gateway Sector Plan (the “Plan”) on behalf of Linthicum Properties Management LLC (“LPM”), owner of a 79-acre farm that straddles West Old Baltimore Road just south and east of the COMSAT site, which is referred to in the Plan as the Linthicum property (the “Property”). Together with the contract purchaser of the Property, JNP/Avanti, LPM and its principals, Charles T. (“Tom”) Linthicum and Paula Linthicum, have worked extensively with planning staff on the Plan and appreciate staff’s continued efforts to maintain an open and collaborative dialogue. The Linthicums are pleased with the Plan’s principle recommendations related to the Property, but continue to have concerns about some elements of the Plan. As noted in our recent public hearing testimony, the Linthicums support the changes to the Plan that JNP/Avanti has proposed and urge the Planning Board to give them favorable consideration.

The Linthicum family is deeply involved in Maryland agriculture and has been farming in Montgomery County for more than 100 years. This property is their last landholding in Clarksburg, which they have decided to sell as part of a decision to focus their farming activities on land they own within the Agricultural Reserve. The Plan recommends rezoning the Property from industrial to mixed-use zoning. The Linthicums support this zoning recommendation and are pleased to know that while this land will no longer be used to produce food, it will provide needed housing in a well-designed community with a lovely setting bordering a stream valley.

The Linthicums also support the alignment for Observation Drive recommended in the Plan, which minimizes the impact of this major roadway on the stream valley abutting the Property to the east, and at the same time preserves space for a cohesive, attractive residential community by pushing the road as close as possible to I-270. As longtime owners of this property, the Linthicums would like to see it make the maximum possible contribution to housing in Clarksburg while also facilitating a vital transportation link through the connection of Observation Drive from Germantown to West Old Baltimore Road. The Linthicums are still actively farming the property. They are intimately familiar with the inadequacies of the transportation network in Clarksburg. Connecting Observation Drive from West Old Baltimore Road to Germantown will provide a vital, long-awaited transportation improvement for the residents of Clarksburg by shortening the drive time from Clarksburg to parts south and relieving some of the pressure

October 3, 2025

Page 2

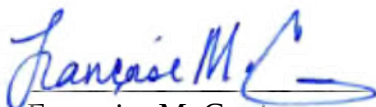
on existing thoroughfares like Route 355. Redevelopment of the Property is the least costly and most practical way to make this connection a reality, because development approvals would trigger dedication of the necessary right-of-way through the Property at no cost to the County. That redevelopment and its timing depend to a great degree on how well the Sector Plan supports the development project that JNP/Avanti proposes.

Two recommendations in the Plan interfere with redevelopment of the Property rather than promoting it: a proposed 200-foot setback from I-270 for residential units and a recommendation for a 35% green cover requirement *in addition to* requirements for reforestation and afforestation. In other parts of the County, residential development has been approved and built within 75 feet of I-270. Green cover requirements in other parts of the County are often 25%, or 35% but without excluding green cover within a conservation easement. The Linthicums have seen significant portions of their family's land taken for public projects over the years, and have also watched Clarksburg struggle to develop as a complete community. For this sector plan to impose stricter development standards in Clarksburg than in other parts of the County would be fundamentally unfair to both the Linthicums and the broader Clarksburg community. In addition, these requirements raise obstacles to redevelopment of the Property and suppress the number of homes that can be built below the density that the Plan otherwise proposes. As a result, these requirements work at cross-purposes to the Plan's and the County's overarching goal of encouraging more housing production. Much as one would love to see every master plan fully implemented, in reality, implementation depends on the intersection between what the applicable guidelines and requirements allow and what the market supports. We hope the Planning Board will strike the right balance in this sector plan.

Thank you for your consideration of these suggestions. The Linthicums look forward to continuing to work with you and your staff towards completion of the Plan.

Sincerely yours,

BREGMAN, BERBERT, SCHWARTZ & GILDAY, LLC

By: _____
Françoise M. Carrier

Cc: Jason Sartori
Patrick Butler
Donnell Zeigler
Clark Larson
Tom Linthicum
Paula Linthicum
Soo Lee-Cho, Esq.

Submitted Testimony on the Gateway Sector Master Plan on Behalf of Clarksburg Residents

From Beth Wolff <bethwolff@clarksburgchurch.com>

Date Fri 10/03/2025 2:49 PM

To MCP-Chair <mcp-chair@mncppc-mc.org>; Larson, Clark <Clark.Larson@montgomeryplanning.org>

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Dear Planning Board Members,

I am writing to share the voices of the Clarksburg community to be submitted as written testimony on the Gateway Sector Master Plan. These were written following our recent *Clarksburg Walk and Roll*, hosted through Clarksburg Church/The Clarksburg Yard.

This community advocacy walk took place entirely within the Gateway Sector Master Plan area and was designed to highlight what is and is not currently working well for residents as they walk, bike, or roll through these spaces.

As part of the event, children, students, and adults each wrote letters naming one area of particular concern to them. I am attaching 17 of those letters for your review.

These letters reflect the real, on-the-ground experiences of Clarksburg residents. A major recurring theme was the **lack of lighting on the MD-355 bike path**, a route that middle school and high school students must use daily to get to and from school. After Daylight Savings, students will be walking this path in complete darkness—raising serious safety concerns for families.

Other letters identify additional issues within the Gateway Sector Master Plan area that need attention in order to make Clarksburg a safe, accessible, and welcoming place for all. These testimonies offer valuable insight from those most impacted by planning decisions, and we respectfully ask that you consider these concerns as you guide the future development of this sector.

Thank you for your thoughtful leadership and for listening to the desires and concerns of Clarksburg residents.

Sincerely,
Beth Wolff



Advocacy letters 9:20:25.pdf

Pastor, Clarksburg Church
22820 Frederick Road
Clarksburg, MD 20871

Beth Wolff

LEAD PASTOR

Clarksburg Church

240 454 5353 / clarksburgchurch.com / @clarksburgchurch

Name: Abnem Seifu

Your Street Address: observation drive

City, State, Zip: Clarksburg MD

Your Age/Grade: Age: 13, grade: 8th

Date: 9/20/2025

SUBJECT:

Dear members of the county council,
I would like for you to build lighting
on the 355 bike Path from clarksburg
high school to cool brook road. et Rocky
hill middle school and clarksburg high school
use this Path to walk to school in the morning
and after school to get back home. in the dark
to get back home from afterschool activities.
This is a problem because the poorly lit Path
can attract unwanted activities and creates an
unsafe environment for the students and people.
we would like to install lights along the 355
bike Path between clarksburg high school and
school to cool brooks road.
Thank you for adressing this issue
Sincerly, Abnem seifu.

Name: Sophia Rangel
Your Street Address: [REDACTED]
City, State, Zip: Damascus, Maryland, 21832
Your Age/Grade: 14 14th grade
Date: 9/20/25

SUBJECT:

Dear members of the County Council,

I think we should focus on street lights leading
to the high school so that students feel safer
walking to and back from school. We would
like to add street lights to the sidewalk
to make it a more safe place! Thank
you for listening. -Sophia R

Name: SKYLER Trimble

Your Street Address: [REDACTED]

- germin town

City, State, Zip: 20974

Your Age/Grade: 14 - grade 9

Date: 9-20-2025

SUBJECT: the 355 bike path

- Dear members of the county council

although I do not live in
clarksburg I still have a
problem with the lack of
lighting on the bike path
from clarksburg High school to copl
brook road. as a student of
Northwest high school I
bike a mile every day and
I know the kids these days
there is a very good
chance that while a kid
go down that path they can
be robbed or beat. we would
like a line of lights along
the path to allow the
walkers to feel safe while
on the path

- thank you for addressing this issue.

- sincerely, SKYLER Trimble

Name: Ishaan Cifuentes
Your Street Address: [REDACTED]
City, State, Zip: Clarksburg MD, 20871
Your Age/Grade: 14 years old / 9th grade
Date: 9/20/2025

SUBJECT:

Dear Members of the County Council, there is not enough lighting on the 355 bike path. Students like myself use the bike path to walk to and from school before ~~school~~ sunrise and after sunset. A path that doesn't have lights isn't safe for people to walk on and if there were lights, it will allow more people to walk on the path while feeling safe. We would like lights to be installed along the bike path to help students and others feel safe and get to their destination safely.

Thank you for addressing this issue.

Sincerely, Ishaan Cifuentes

Name: Taniya Cifuentes

Your Street Address: [REDACTED]

City, State, Zip : 20871

Your Age/Grade: 12 years old 7th grade

Date: September 20, 2025

SUBJECT: add more lighting on the bike path on Fredrick road

It impacts me because I am a middle schooler and once I reach high school I'm going to have to walk and once it becomes more darker its going to be hard to see where you are going. Its also a safety concern, it hard to see and can be scary to walk. I think that it will be important to add trash cans because it saves us from cleaning up a bunch of litter. I go on walks to clean up the community and there is bags full of trash.

Name: Kyle Adam
Your Street Address: Boys
City, State, Zip: Maryland
Your Age/Grade: 14 years old, 8th
Date: 09/20/25

SUBJECT:

To the members of the city council

I would like to advocate the
lack of lighting on the 355 bike path
from clarksburg High school to cool
brook. without light, crimes can happen
because of the poor lighting. without
light, accidents can happen for cars
that can be caused by wildlife or
uneven surfaces. Students and families
can use the path more often
without worry about accidents or
crimes. We would like to install lighting
along the 355 bike path between
clarksburg high school.

Thank you for addressing this issue,
sincerely, Kyle Adam

Name: Caitlin Singh
Your Street Address: [REDACTED]
City, State, Zip: Clarksburg MD
Your Age/Grade: 8th grade 13 years old
Date: 09/20/25

SUBJECT:

Dear Members of the County Council,
I would like to bring up the lack of lighting on the 355 bike path from Clarksburg HS and to Coal Brook road. The installation of lights would help and guide students who walk from and to school. There is not much lighting and students who walk on that path will not feel safe. I would like for lights to be installed on the 355 bike path. This isn't just for students, but for the entire Clarksburg Community. Sincerely,
Caitlin Singh.

Name: Kevin Qi

Your Street Address: _____

City, State, Zip: Germentown

Your Age/Grade: _____

Date: Sept 20th 2025

SUBJECT:

To the members of the city council,

I would like to voice my concerns
about the lack of lighting on the 335
bike path from the Clarksburg High School
path to the Cool Brook Road. Without
lighting, I feel it is unsafe and dangerous
for pedestrians and students to take a
commute through this road. As a community,
we would like lights to be installed
throughout the walkway. Thank you for
your time.

- Kevin Qi

Name: Carlos Rangel

Your Street Address: _____

City, State, Zip: Damascus MD 20872

Your Age/Grade: 37

Date: _____

SUBJECT:

Dear Members of the City Council

I am writing about the lack of
lighting on the walking/Bicycle path
on Frederick Rd. which is used by
students and community members.

Students use this path on their
way to school and residents use
it as a safe place to Bike and walk.

The electrical infrastructure already
exist so adding light would be
an easy way ~~safety~~ and increase
safety : accessibility,

Thank you for addressing this issue

Sincerely

Carlos Rangel

Name: Vanshika Gunda

Your Street Address: [REDACTED]

City, State, Zip: Clarksburg, Maryland, 20871

Your Age/Grade: Age: 12 Grade: 7th

Date: 09/20/2025

SUBJECT:

Near Clarksburg High School, there is a lack of lighting on the bike path. That path is crucial for both the people who go to Rocky Hill Middle School & Clarksburg High School. Lighting there can reduce crime and it helps walkers feel comfortable. This is why lighting there is crucial.

Thank you for addressing this issue,
Sincerely, Vanshika Gunda

Name: Miguel Cifuentes

Your Street Address: [REDACTED]

City, State, Zip: Clarksburg, MD 20871

Your Age/Grade: 41

Date: 9/20/2025

SUBJECT:

Dear Members of the County Council,

On a recent walk home after a home football game,
I noticed no lighting along the bike path on rt 355.
It was difficult walking in the dark and tried using my
phone but it did not help much. I believe this is a
concern for the kids who walk to Rocky Hill M.S and
Clarksburg H.S, and a concern to me having children
that attend those schools.

I have also noticed a difficult time seeing students
crossing 355 by Running Brook Dr at the crosswalk.
I believe a flashing lighting device would be helpful
for drivers to see someone intends to cross over 355.
I have seen times where pedestrians have been
ignored trying to cross or probably are not seen.
I feel these two areas of concern will provide more
safety for the people that cross and walk the paths
along 355. They are two areas that can be
addressed fairly quickly.

Thank you for addressing these issues.

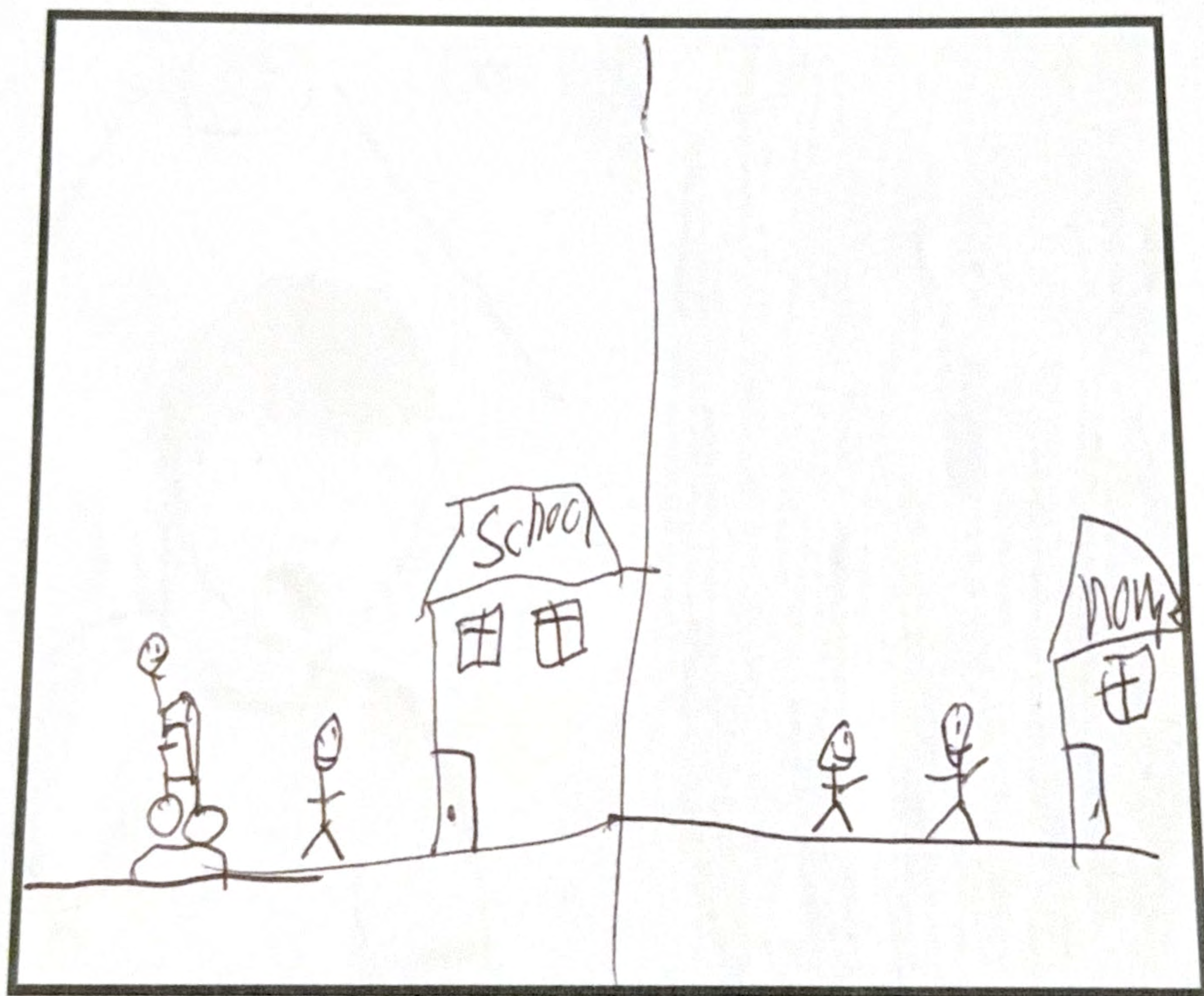
Sincerely,

Miguel Cifuentes

Name: Soe Thu



I live



To required to use bike path
walk to the school in
Morning after that walk
home.

Name: Erik Fuentès



Damauscos



Lack of residents use
this path to go to
school so there should
be lights cause students
wouldn't like to be walking in
Darkness.

Name: Mary Li

Your Street Address: Cabin Branch, Clark County

City, State, Zip: _____

Your Age/Grade: _____

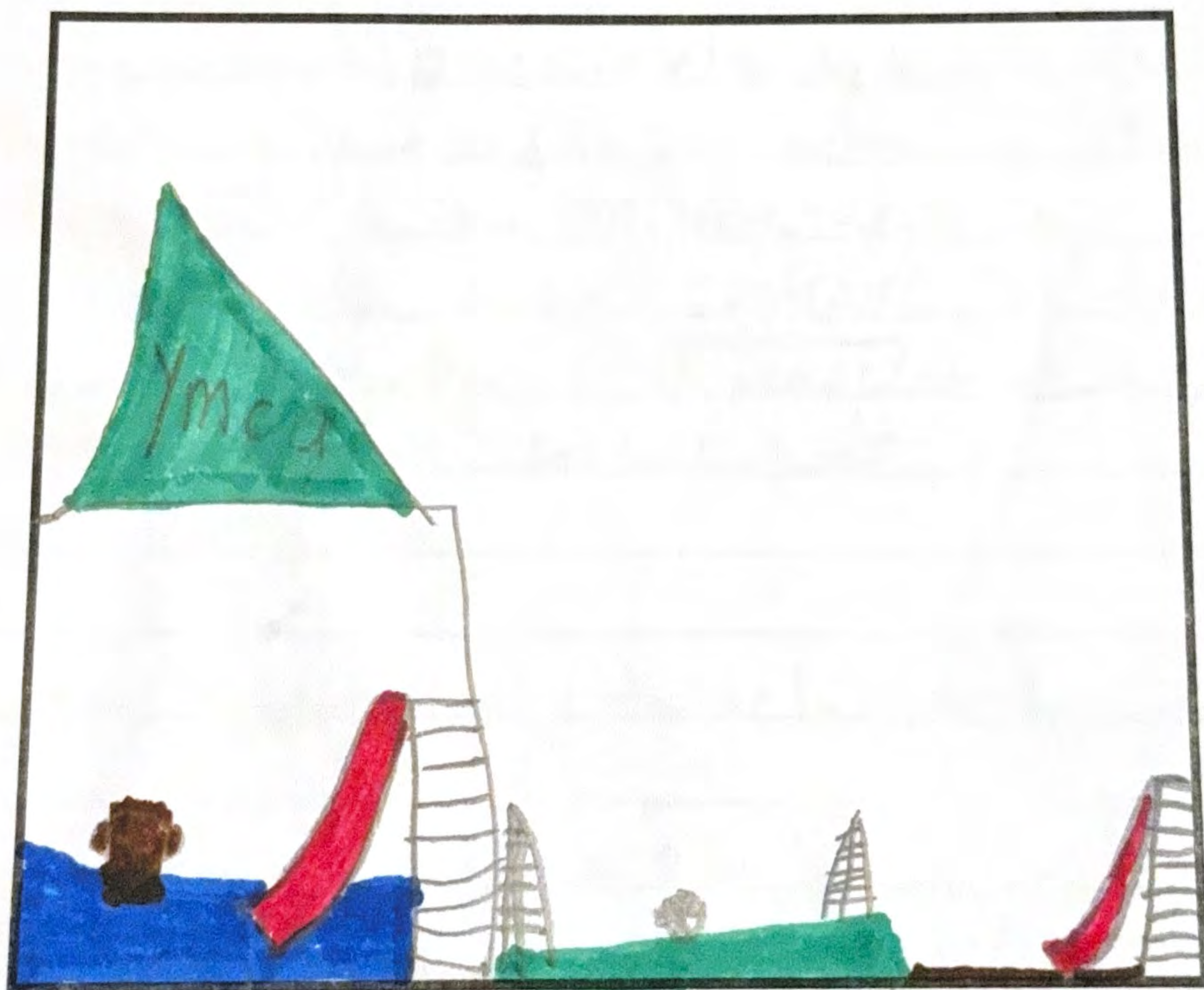
Date: _____

SUBJECT:

I would love the consent area to be ~~not~~ developed as an area like the Rio with a lake to walk around or a park. There ~~are~~ could be great restaurants there! Especially Asian restaurants. Thanks!

Name: Rafael Cifuentes 

2nd grade clarksberg
elementary
School



On the open field (comsat)
I want to have a pool and
activity center like the ymca
or a soccer field.

Name: VENKATA VASIREDDY

Your Street Address: [REDACTED]

City, State, Zip: CLARKSBURG, MD, 20871.

Your Age/Grade: 48

Date: SEP 9/20/25

SUBJECT: Rec Center & Library Needed Immediately.
- Lack of Rec Center & Library in Clarksville Community

Problem: Due to ~~no~~ Rec Center & Library available in Clarksville we need to drive to Damascus (8) Germantown. It is taking a lot of time to Rec Center & Library.

I would like to use "COMSAT" Site to use Rec Center & Library. So it is accessible to Clarksville High School & Potomac High School as well.

Problem: Truck & trucks in Gateway Center Drive

I would like to put bike lanes to it would not ~~be~~ appear of Abandon place for near residents should not feel this; it is a bad place. The Truck & Trucks should use their own parking lot. Not the public Road. In Community.

Problem: No alternative Road to 355 to traffic.

I would like to have alternative Route to 355. as Observation Drive parallel to 355 from EX-16 to 18. South to North.

Name: Mia Song
Your Street Address: [REDACTED]
City, State, Zip: 20871
Your Age/Grade: 14 9th grade
Date: 9/20/25

SUBJECT:

The Problem is all the trucks parked on the side and not moving after multiple asks. This is a big problem because of the walkers that walk there. We would like for them to move to a different parking forever. Thank you for addressing this issue. -Sincerely Mia

From: [Soo Lee-Cho](#)
To: [MCP-Chair](#)
Cc: [Sartori, Jason](#); [Butler, Patrick](#); [Zeigler, Donnell](#); [Larson, Clark](#); [Francoise Carrier](#); [James Proakis <jproakis@jnpcap.com>](#); [William Rogers](#)
Subject: JNP/Avanti comments on Clarksburg Gateway Sector Plan Public Hearing Draft
Date: Friday, October 3, 2025 4:41:26 PM
Attachments: [JNP-Avanti CGSP Public Hrg Draft Comment Letter 10 03 2025.pdf](#)
[Exhibit A_CBM_Illustrative rendering concept sketch 2024-08-30b-Layout1.pdf](#)
[Exhibit B-1_Observation Drive Road Section 105" RW - JNP-Avanti Proposed.pdf](#)
[Exhibit B-2_Observation Drive Road Section 115" RW - JNP-Avanti Proposed.pdf](#)

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Please accept the attached comment letter into the record of the Public Hearing Draft of the Clarksburg Gateway Sector Plan, submitted on behalf of JNP Capital Management and Avanti Properties Group (JNP/Avanti), the developer/contract purchaser of the Linthicum property.

Thank you.

Soo



Soo Lee-Cho

BREGMAN, BERBERT, SCHWARTZ & GILDAY, LLC

7315 Wisconsin Avenue, Suite 800 West

Bethesda, Maryland 20814

301-656-2707 x5902 **PHONE** | 301-961-6525 **FAX** | 301-318-3884 **MOBILE**

Email: sleecho@bregmanlaw.com

www.bregmanlaw.com

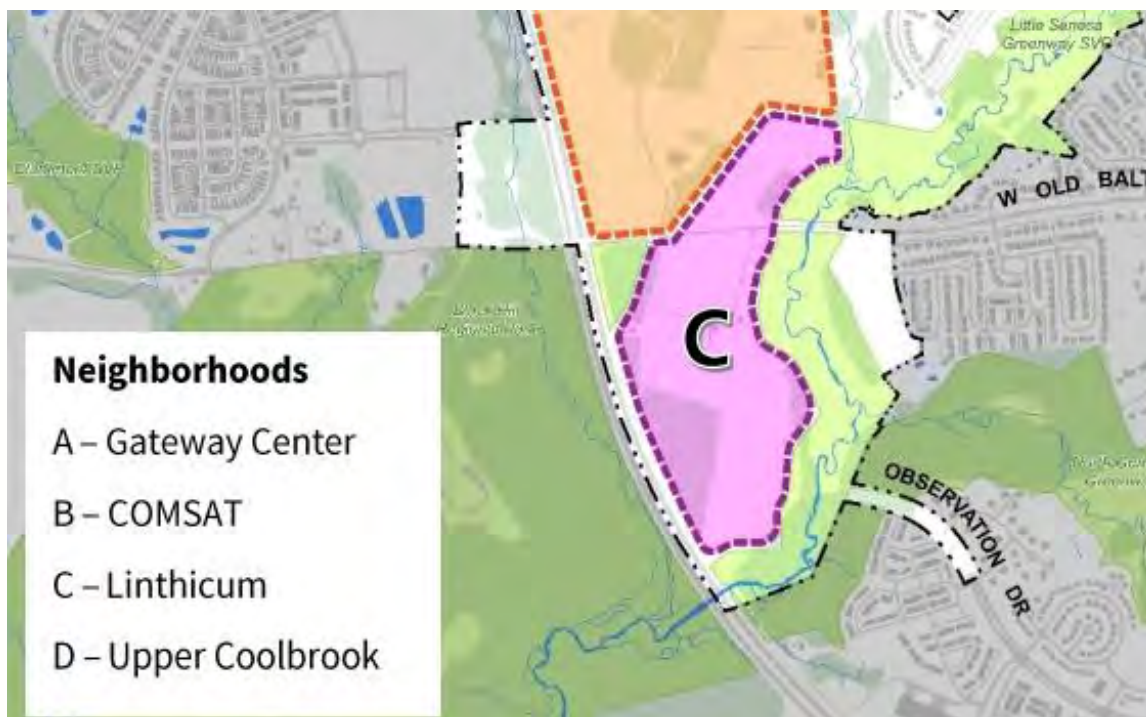
October 3, 2025

Artie Harris, Chair, and Members,
Montgomery County Planning Board
2425 Reedie Drive, 14th Floor
Wheaton, MD 20902

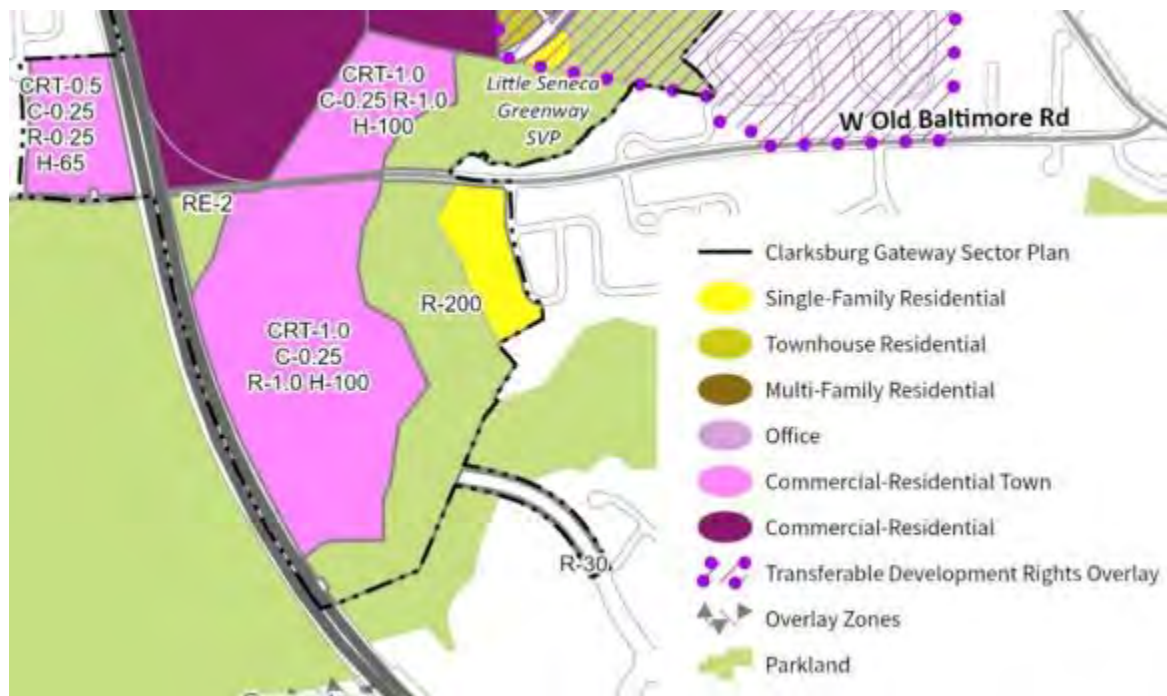
Re: Clarksburg Gateway Sector Plan Public Hearing Draft – Linthicum Property

Dear Chair Harris and Members of the Board:

The following are comments regarding the Clarksburg Gateway Sector Plan Public Hearing Draft (the “CGSP” or “Plan”) being submitted on behalf of JNP Capital Management and Avanti Properties Group (together “JNP/Avanti”) as the developer and contract purchaser of the Linthicum property – a 79-acre farm (“Property”) that is separately identified in the Plan as the Linthicum Neighborhood, i.e., area ‘C’ on Figure 32, Neighborhood District Map (excerpted below).



As testified at the Planning Board’s public hearing on this matter, JNP/Avanti engaged in the early phase of the CGSP’s development process and encouraged planning staff to ‘rethink’ the alignment of the portion of Observation Drive that traverses through the Linthicum property in a manner that minimizes grading and environmental impacts on the stream valley. We are pleased to see and fully support the western re-alignment of Observation Drive through the Property that is proposed by the Plan. We also support the Plan’s recommended land uses and proposed CRT zoning for the Property, specifically CRT-1.0 C-0.25 R-1.0 H-100.



In this letter, JNP/Avanti seeks to provide more detail regarding their development plans for the Property and express concerns regarding three elements of the Public Hearing Draft.

1. JNP/Avanti’s Concept Plan Will Achieve Important County Goals

JNP/Avanti’s current concept plan for development of the Property is attached as **Exhibit A** (the “Concept Plan”). The Concept Plan provides for a new residential community of approximately 700 units, consisting of a mix of multi-family, town home, duplex, and single-family units. JNP/Avanti believes the development contemplated in the Concept Plan is consistent with the County’s goals and will allow the Linthicum property to make a significant contribution to increasing the amount and variety of housing in Clarksburg.

The Concept Plan proposes development that will work with the existing topography of the

Property. The Property slopes down from I-270 on its western boundary toward the Little Seneca Greenway Stream Valley Park (the “SVP”) along the eastern boundary.

The design of the Concept Plan is intended to take maximum advantage of the Property’s location bordering the SVP along its eastern boundary and create a community with strong connections to green space. Residential blocks will be interspersed with small, block-sized green spaces, terrace down to the east to work with the existing west-to-east slope of the land and offer scenic views to promote future resident engagement with the stream valley.

As discussed above, JNP/Avanti proposed a realignment of Observation Drive through the Linthicum property, shifting the road to the west, away from the SVP, which has been incorporated into the Public Hearing Draft. This realignment has two substantial benefits. First, by moving Observation Drive away from the SVP, the environmental impact of the new road on the SVP will be diminished. Second, the siting of Observation Drive along the high point of the Property will minimize grading during construction, which is a stated goal in the Transportation Recommendations section of the Public Hearing Draft. JNP/Avanti appreciates that the Public Hearing Draft of the Plan embraces their proposed western realignment and looks forward to continuing to work with County stakeholders to help finally make this long-awaited transportation improvement a reality for the greater Clarksburg community.

2. Proposed Road Sections for Observation Drive Should Incorporate Stormwater Management

While JNP/Avanti agrees with the realignment of Observation Drive, the proposed road sections are not yet fully consistent with the Transportation Recommendations, which could present challenges in implementing the roads sections as they are currently presented in the Public Hearing Draft of the Plan. The Transportation Recommendations require that stormwater management elements be included within the public right-of-way, but the recommended road sections which appear on Page 43 of the Public Hearing Draft contain no stormwater management elements. JNP/Avanti believes it is important that the Plan provide useful guidance that advances implementation of its land use recommendations and eliminates unnecessary conflict or potential misinterpretation during the regulatory review phase when possible. Here, the importance of stormwater management compliance for any new road construction is without question and should not be excluded from road sections.

JNP/Avanti engaged with MCDOT during the early stages of the CGSP’s development process as well as more recently to discuss MCDOT’s plans to seek necessary CIP funds to facilitate the future build-out of Observation Drive. The road sections for Observation Drive included in the Plan were also discussed. Based on guidance obtained from MCDOT, JNP/Avanti, in conjunction with their civil engineering firm, has developed modified road sections for the 105’ and 115’ Observation Drive Extended road sections (attached hereto respectively as **Exhibits B-1 and B-2**) which retain the Complete Streets elements while also addressing stormwater management needs. Tree buffer areas can and should serve a dual purpose and facilitate stormwater management within the right-of-way. Vehicle lane widths should be modestly reduced to minimize pavement as much as possible. In sum, the road sections included in the Plan should ensure that future implementation of Observation Drive is not only consistent with a vision but is in fact achievable.

3. The Plan's Recommended Setback from I-270 Should be No Greater than 75 Feet

The Public Hearing Draft currently calls for a 200-foot setback from I-270 for residential units. The Concept Plan complies with a 75-foot setback, which is consistent with setbacks from I-270 in other parts of the County. A 200-foot setback would result in the loss of approximately 150 units, or 22% of the proposed units. JNP/Avanti currently plans to engage with MCDOT to enter into a Road Participation Agreement that would facilitate construction of Observation Drive on a potentially faster timeline than might be achieved as a CIP only project. Such a drastic reduction in density could jeopardize JNP/Avanti's ability to facilitate this major infrastructure improvement.

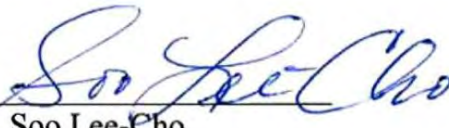
4. The Plan's Recommended Green Cover Standard is Unduly Burdensome

JNP/Avanti anticipates that existing forest conservation regulations will require substantial on-site reforestation and afforestation. The Public Hearing Draft requires a higher than typical green cover requirement of 35%, while also excluding future forest conservation areas from the calculation. The proposed development cannot be achieved if 35% green cover standard is imposed in addition to the reforestation and afforestation requirements that will certainly be required of this development. Accordingly, JNP/Avanti proposes that either the green cover requirement be lowered to 25%, or the exclusion of future forest conservation areas be removed from the standard.

Thank you for your consideration of these comments. JNP/Avanti looks forward to continuing these discussions as you work toward a Planning Board Recommendation Draft.

Sincerely yours,

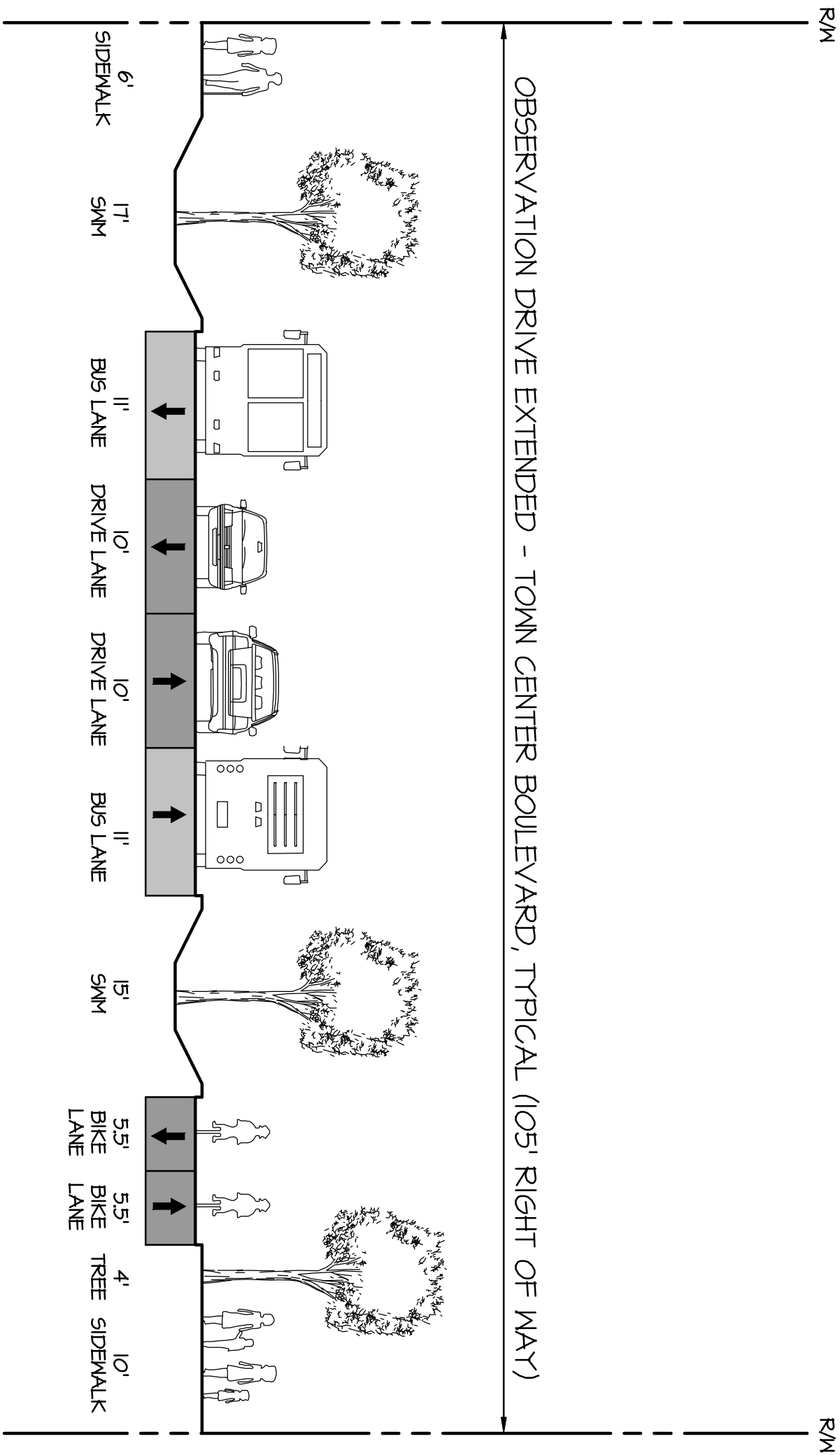
BREGMAN, BERBERT, SCHWARTZ & GILDAY, LLC

By: 
Soo Lee-Cho

Attachments

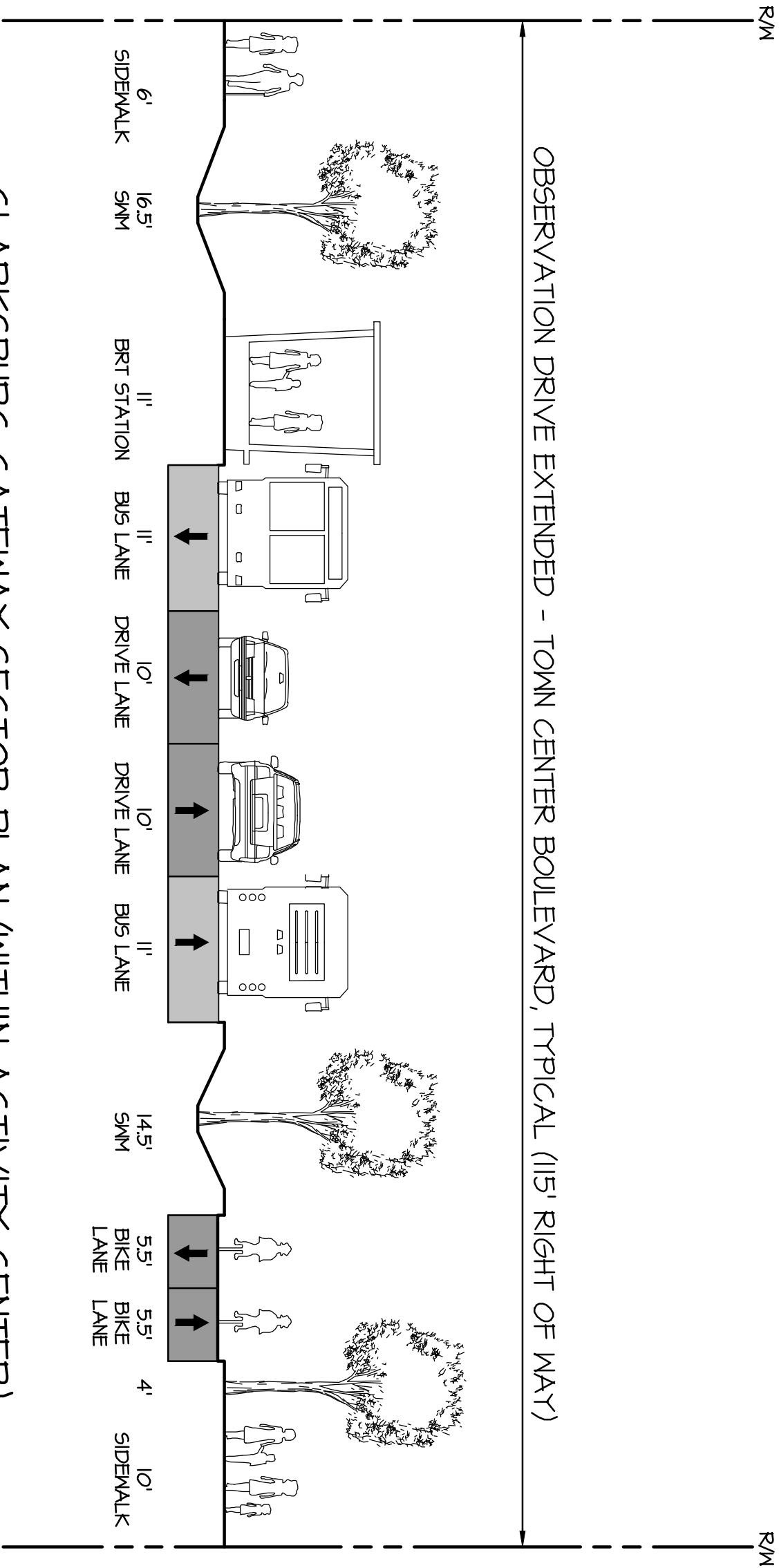
Cc: Jason Sartori, Planning Director, MCPD
Patrick Butler, Upcounty Planning Chief
Donnell Zeigler, Master Plan Team, Supervisor
Clark Larson, Master Plan Team, Planner III
Jim Proakis, JNP/Avanti
Françoise Carrier, Esq.

EXHIBIT B-1

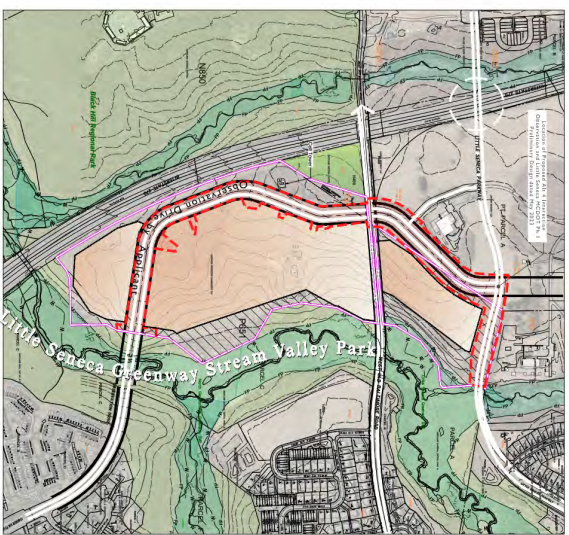


CLARKSBURG GATEWAY SECTOR PLAN FULL SECTION

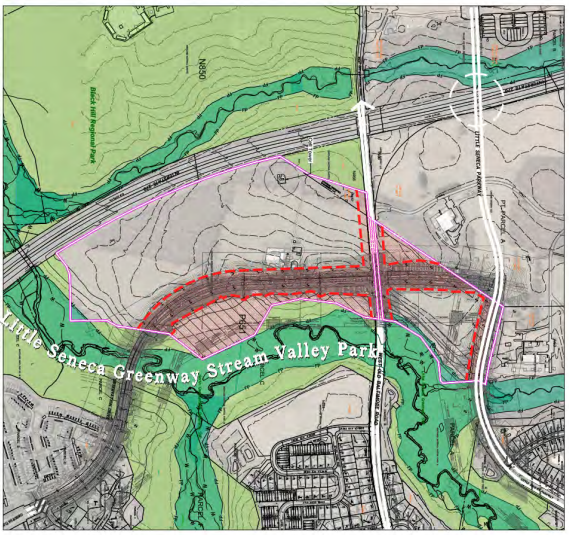
EXHIBIT B-2



CLARKSBURG GATEWAY SECTOR PLAN (WITHIN ACTIVITY CENTER)
FULL SECTION



Proposed Alignment by JNP/Avanti



Alternative 4 - 1994 Master Plan Alignment Adjusted



NOTES:

1. This map is a preliminary plan and should not be used for construction purposes.
2. The alignment shown on this map is subject to change without notice.
3. The alignment shown on this map is subject to change without notice.
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OWNER:

Linthicum East
Observation Drive Comparison

DESIGNER:

CBM Consulting

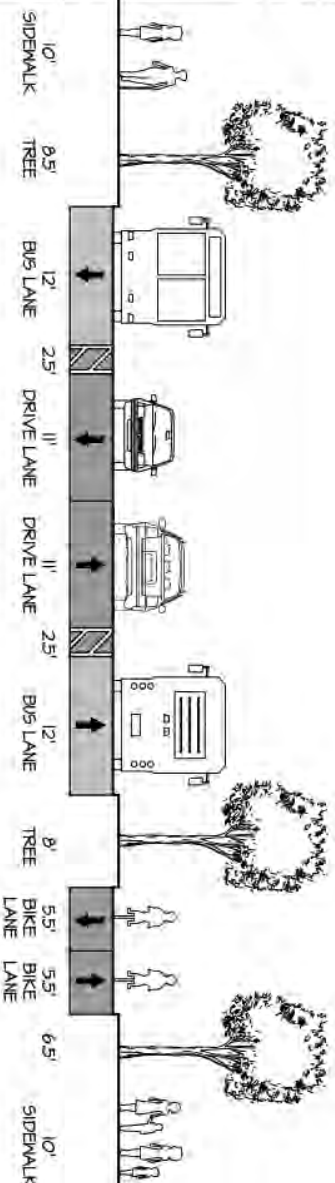
DATE:

02/01/2024

SCALE:

1" = 100'

OBSERVATION DRIVE EXTENDED - TOWN CENTER BOULEVARD, TYPICAL (105' RIGHT OF WAY)



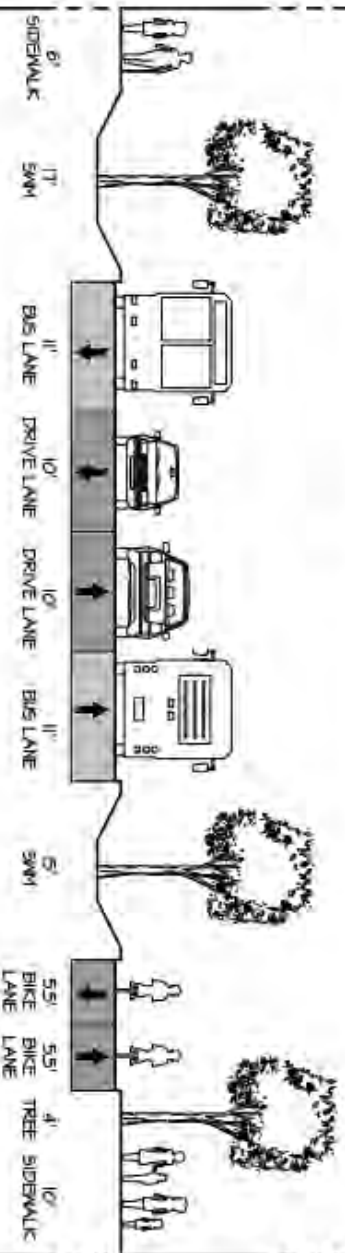
CLARKSBURG GATEWAY SECTOR PLAN FULL SECTION

JNP/AVANTI PROPOSED

R/W

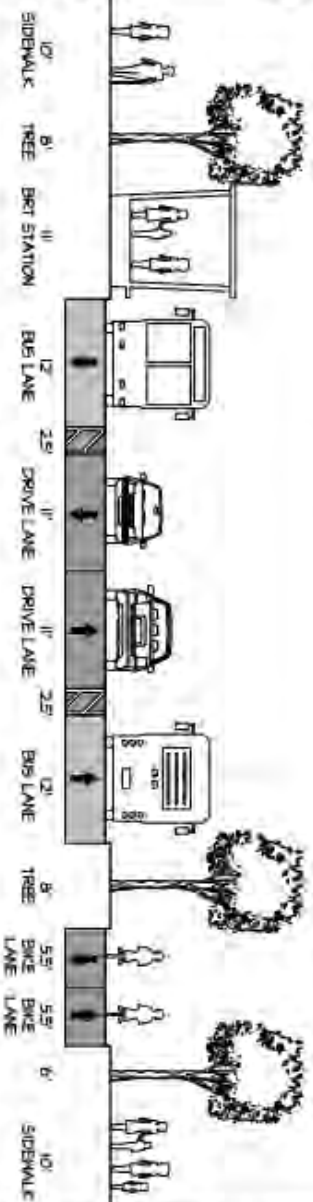
R/W

OBSERVATION DRIVE EXTENDED - TOWN CENTER BOULEVARD, TYPICAL (105' RIGHT OF WAY)



CLARKSBURG GATEWAY SECTOR PLAN FULL SECTION

OBSERVATION DRIVE EXTENDED - TOWN CENTER BOULEVARD, TYPICAL (115' RIGHT OF WAY)

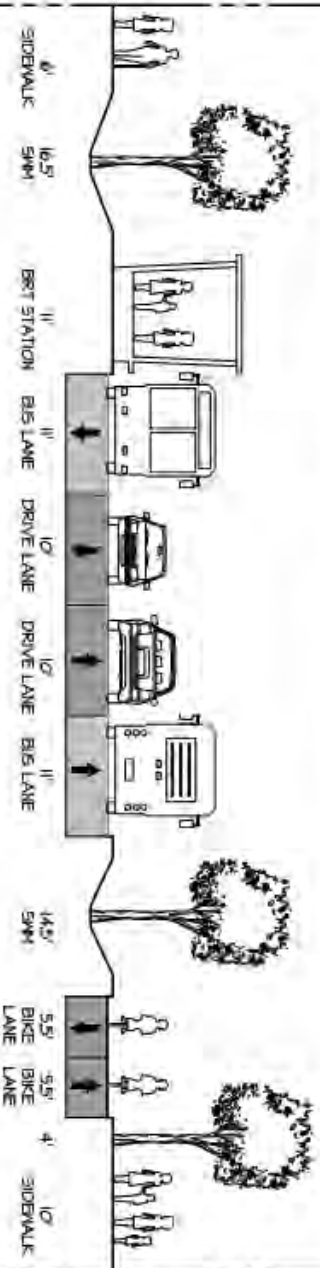


CLARKSBURG GATEWAY SECTOR PLAN (WITHIN ACTIVITY CENTER)

FULL SECTION

JNP/AVANTI PROPOSED

OBSERVATION DRIVE EXTENDED - TOWN CENTER BOULEVARD, TYPICAL (115' RIGHT OF WAY)



CLARKSBURG GATEWAY SECTOR PLAN (WITHIN ACTIVITY CENTER)

FULL SECTION

From: [Robins, Steven A.](#)
To: MCP-Chair; [Harris, Artie](#); [Hedrick, James](#); [Pedoeem, Mitra](#); [Bartley, Shawn](#); [Linden, Josh](#)
Cc: [Bob Elliott](#); [Mike Alexander](#); [Balcombe, Marilyn](#); [Sartori, Jason](#); [Kronenberg, Robert](#); [Christopher R. Conklin \(christopher.conklin@montgomerycountymd.gov\)](#); [Butler, Patrick](#); [Zeigler, Donnell](#); [Larson, Clark](#); [Ballo, Rebecca](#); [Brockmyer, Richard](#); [gunterberg@rodgers.com](#); [Casey Blair Anderson \(canderson@rodgers.com\)](#); [Robins, Steven A.](#)
Subject: River Falls Supplemental Submission/Clarksburg Gateway Sector Plan Public Record
Date: Friday, October 3, 2025 11:57:43 AM
Attachments: [River Falls Additional Submission 10 03 2025.pdf](#)
Importance: High

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Dear Chair Harris and Members of the Board: Attached please find River Falls Investments LLC supplemental submission on matters related to the Clarksburg Gateway Sector Plan. We would appreciate it if you would include this submission in the official public record for the Sector Plan. We look forward to the first worksession on October 16. Thank you very much for your consideration of our position on the Plan.

Have a nice weekend.

Steve Robins

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October 3, 2025

By Electronic Mail

Artie Harris, Chair
and Members of the Montgomery County Planning Board
Maryland-National Capital Park & Planning Commission
2425 Reedie Drive, 14th Floor
Wheaton, Maryland 20902

Re: Clarksburg Gateway Sector Plan – Public Hearing on Working Draft
Supplemental Submission for the Clarksburg Gateway Sector Plan –
River Falls Investments LLC (formerly Lantian Development), Owner of the Comsat Site

Dear Chair Harris and Members of the Planning Board:

On behalf of River Falls Investments LLC, formerly known as Lantian Development LLC (now jointly, “River Falls”), and the current owner of the Comsat Site in Clarksburg, Maryland, we respectfully request that you enter this letter and accompanying materials for inclusion in the official record of the Clarksburg Gateway Sector Plan.

Included in this submission are:

- A. Letter dated September 25, 2025, from Tommy Cleaver, CBRE, Executive Vice President, Mid-Atlantic Life Sciences Leader, addressed to Artie Harris, Chair, and Members of the Planning Board, commenting on CBRE’s efforts to market the Comsat property and the key elements of the Sector Plan needed to unlock the site for a major opportunity in Montgomery County. We encourage the Planning Board to carefully review this correspondence and its importance to the Board’s deliberation on the Plan.
- B. Memorandum from RCLCO to Lantian Development LLC, dated September 23, 2025, discussing the infeasibility of a high-density development scenario on the Comsat property.
- C. Memorandum from RCLCO to Lantian Development LLC, dated September 23, 2025, regarding the importance of the planned Exit 17 interchange and its potential to unlock market opportunities for the Comsat property.
- D. Memorandum from Will Zeid, PE of Kimley Horn dated October 3, 2025, discussing examples of how an interchange can be phased with an initial bridge construction and ramp construction to follow separately, if needed.
- E. Testimony of Robert Elliott, CEO of River Fall, which he delivered at the hearing before the Planning Board on September 25, 2025.

We thank Chair Harris and the Board for allowing River Falls the opportunity to present its testimony at the hearing. In summary, we reiterate the solutions we urge the Board to adopt:

1. Do not designate the property/building historic.
2. Keep Exit 17 as a potential alternative. Do not remove it from the plan.
3. Limit and rationalize excessive land takes and restrictions.
4. Implement the Constellation Parks String of Pearls concept.
5. Create a plan for market-ready development types. Include surface parking and horizontal formats that can succeed and enable a more vertical typology to develop over time.
6. Maintain visibility for jobs and retail while establishing the framework for economic development as a top priority.

We would be happy to answer any questions the Board may have during your upcoming work sessions. We have invested significant time, effort, and funds into this sector planning effort and welcome the opportunity to share our work with the Board during its work sessions. We approach the Board with a spirit of unwavering cooperation. Our goal is to seize this generational opportunity and position the Clarksburg Gateway and the property to deliver a transformative project that promotes substantial economic development, expands our much-needed housing stock, and, just as importantly, helps restore Montgomery County's reputation as a highly desirable, dynamic, and vibrant place to live and work.

Sincerely,

LERCH, EARLY & BREWER, CHARTERED

Steven A. Robins

By: _____

Steven A. Robins
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cc : Robert Elliott
Mike Alexander
The Honorable Marilyn Balcombe
Jason Sartori
Robert Kronenberg
Christopher Conklin
Patrick Butler
Donnell Ziegler
Clark Larson
Rebeccah Ballo
Richard Brockmyer
Gary Unterberg
Will Zeid
Casey Anderson

Exhibit A

MEMO



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September 25, 2025

Artie Harris, Chair
And Members of the Montgomery County Planning Board
Maryland-National Capital Park & Planning Commission
2425 Reedie Drive, 14th Floor
Wheaton, Maryland 20902

Dear Members of the Montgomery County Planning Board:

Our firm, CBRE Group Incorporated (CBRE), the world's largest commercial real estate services firm, has been actively involved in the representation and leasing of River Falls' Comsat property since 2021. My team is widely regarded as the leader in the Office and Life Science space with 72% market share and over \$3 billion worth of transactions since 2021, including deals with AstraZeneca, GlaxoSmithKline, Emergent Bio, Illumina, Charles River Labs, NIH, NIC, among many others.

We took this assignment because of our conviction in the site's potential. Comsat is a rare property encompassing over 200 acres in Montgomery County with over 3,600 feet of I-270 frontage. Properties of this scale and size rarely exist and are in high demand due to their ability to accommodate mixed use and large-scale development. Despite a long list of accolades, the Comsat property has remained vacant for over 20 years. This stagnation is not due to a lack of interest; or the absence of effort from either River Falls or CBRE.

Since CBRE was engaged, the property has remained a top priority for our team. We have submitted the site for 9 formal national solicitations and presented to over 60 additional Fortune 500 companies and large-scale privately held life science users – virtually all have expressed sincere interest. While these contemplated transactions vary in their potential outcomes, all would have resulted in material commitments (anywhere from 500,000 to 2,250,000 million square feet of life science space) with \$1+ billion of total investment and significant job creation.

In parallel with these efforts, we have spoken with both the prior and current Governors, their Commerce teams, as well as the current County Executive and MCDC about the potential for this property. We have completed over 20 site tours, custom renderings, concept plans and conducted extensive outreach to market the property globally.

After digesting the feedback from several early site tours, CBRE recommended a comprehensive interior demolition project to facilitate property visits and enable easier visioning of a repurposed building. Lantian subsequently hired a contractor to perform over \$1 million in select interior demolition to accommodate this feedback. This accommodation improved the tour experience but did not solve the more salient feedback of not wanting the property because of the building.

Thus far, CBRE has been unable to close a deal with a major user because of the encumbrances imposed by preserving the main Comsat building. Feedback has been consistent: fear of delays, large capital outlays to rehab the building, and simply put, groups are not interested in planning around it. For commitments/investments of this scale, these user groups require a blank canvass.

We were pleased to hear that the Planning Department has come to the same conclusion and is recommending that the main building does not have to be preserved. This will open interest and allow us to reengage with several active requirements.

Now that a resolution is imminent for the building, the focus needs to shift to ensuring additional steps are taken to further enhance the viability of the site. The scale and location will make this site one of the most intriguing opportunities across the country for the global life sciences community. While resolving the building issues helps position the site for success that could spur significant economic development, new residents, and net-new high paying jobs for Clarksburg, Montgomery County, and the State of Maryland, CBRE believes the Planning Commission needs to take a few additional steps to realize the full economic potential of the Comsat property.

The first key item is for the County to preserve the interchange in the sector plan. We do not see a downside to including it as a future possibility; conversely, we see tremendous upside in touting it as a key feature to attract major, global users. Eliminating it at this early stage of the process could prove to be a losing proposition to attract the kind of major end-user that would benefit the community and greater area. Keeping the interchange in the sector plan provides the most optionality for future development and positions the site to compete for the best-in class users that would transform the landscape.

In addition to the interchange, one of the most unique and attractive aspects of this site is its scale. Sites with this amount of usable acreage with frontage on major thoroughfares are extremely rare, especially in Montgomery County. The pharmaceutical is in the beginning stages of investing hundreds of billions of dollars to onshore their manufacturing capabilities – their investments tend to be in large scale campuses, many of which have 100+ acre thresholds. This is a consistent theme in the request for proposals we have responded to.

We were extremely concerned to learn that there are discussions around potentially reducing the usable acreage at the Comsat site to +/-50 acres. Doing so would eliminate the site's largest competitive advantage and immediately remove it from consideration amongst the referenced national requirements.

The uptick in domestic manufacturing needs is very real – see recent announcements from Eli Lilly (227 acres in Virginia and 236 acres in Texas). I recently met with CBRE's head of biomanufacturing site selection, and he reaffirmed the significant uptick in active requirements as well as the 100+ acre scale threshold. Our firm has direct visibility into this pipeline and can confirm the criticality of preserving this scale.

In short, the Comsat site represents a near-term opportunity to catalyze economic activity and create a substantial number of jobs across the socio-economic spectrum. Creating a blank canvass, preserving scale, and improving access will check the requisite boxes and pave the way for one of the next major announcements to come from Maryland.

I will make myself available to discuss in greater detail and respectfully ask that you take the above to heart. We/you are very close to unlocking a gamechanger for the County and State.

Sincerely,



Tommy Cleaver

CBRE, Executive Vice President, Life Sciences Mid-Atlantic Leader

Exhibit B

MEMORANDUM

DATE: September 23, 2025

TO: Lantian Development LLC

FROM: RCLCO

SUBJECT: Viability of High-Density Development at Former COMSAT Headquarters Site

INTRODUCTION

As requested, RCLCO has conducted extensive research to guide your efforts to redevelop the former COMSAT Headquarters site in Clarksburg, Maryland. Located east of I-270 and roughly a half mile south of the Clarksburg Road interchange, the approximately 200-acre campus (“subject property”) is home to the now-vacant, 496,000-square-foot COMSAT headquarters building. RCLCO’s involvement in your efforts to redevelop the subject property began in September 2017, when RCLCO completed a highest-and-best use analysis to inform your initial planning efforts. In October 2023, you then re-engaged RCLCO to help develop a market-supported, financially optimized, and fiscally positive redevelopment program. Over the ensuing two-year period, RCLCO has worked closely with you to develop, refine, and strengthen these plans, ensuring they are grounded in market and financial realities while advancing your vision for a best-in-class mixed-use development that is appropriate for this location and will advance economic development and significant housing opportunities in the County.

The purpose of this memo is to outline findings related to the density of development likely to be feasible at the subject property. As you have shared, your goal is to deliver a best-in-class mixed-use environment at the subject property. In Montgomery County, many comparable developments—such as Pike & Rose in North Bethesda and Downtown Crown in Gaithersburg—have relied on mid- to high-density building typologies, which have maximized the efficiency of these developments by incorporating housing above ground-floor retail and prioritizing structured rather than surface parking. However, this approach is unlikely to be viable at the subject property in the foreseeable future. Both RCLCO’s analysis and the COMSAT Financial Feasibility Study conducted by HR&A Advisors for the Montgomery County Planning Department reach the same conclusion: The financial conditions necessary to support higher-density building formats that rely on mid-rise building typologies and structured parking are not present at this site. Instead, a different strategy is needed—one that still fosters a walkable, high-quality public realm and supports a gradual transition to more vertical forms of development over time. This strategy means embracing horizontal formats and surface parking where necessary to facilitate development within a reasonable timeframe.

SUMMARY OF RCLCO ANALYSIS

In January 2024, RCLCO completed a strategic market analysis for the subject property. Two key components of this analysis involved projecting achievable pricing and estimating the resulting residual land value by development concept. Residual valuation is a method for estimating the value of land with development potential, calculated by subtracting development costs from the anticipated value of the completed project. A project is said to have a “positive” land value when its expected value exceeds its costs, indicating financial feasibility for a developer. Conversely, a “negative” land value means projected costs exceed the capitalized value of the development, rendering the concept financially infeasible.

At the time of the analysis, RCLCO relied on 2022 and 2023 market data, much of which was collected prior to recent interest rate hikes that have significantly increased financing costs for developers. These higher costs have rendered many previously feasible projects more difficult to pursue. As such, development feasibility is generally lower—not higher—today than it was at the time of the study. This

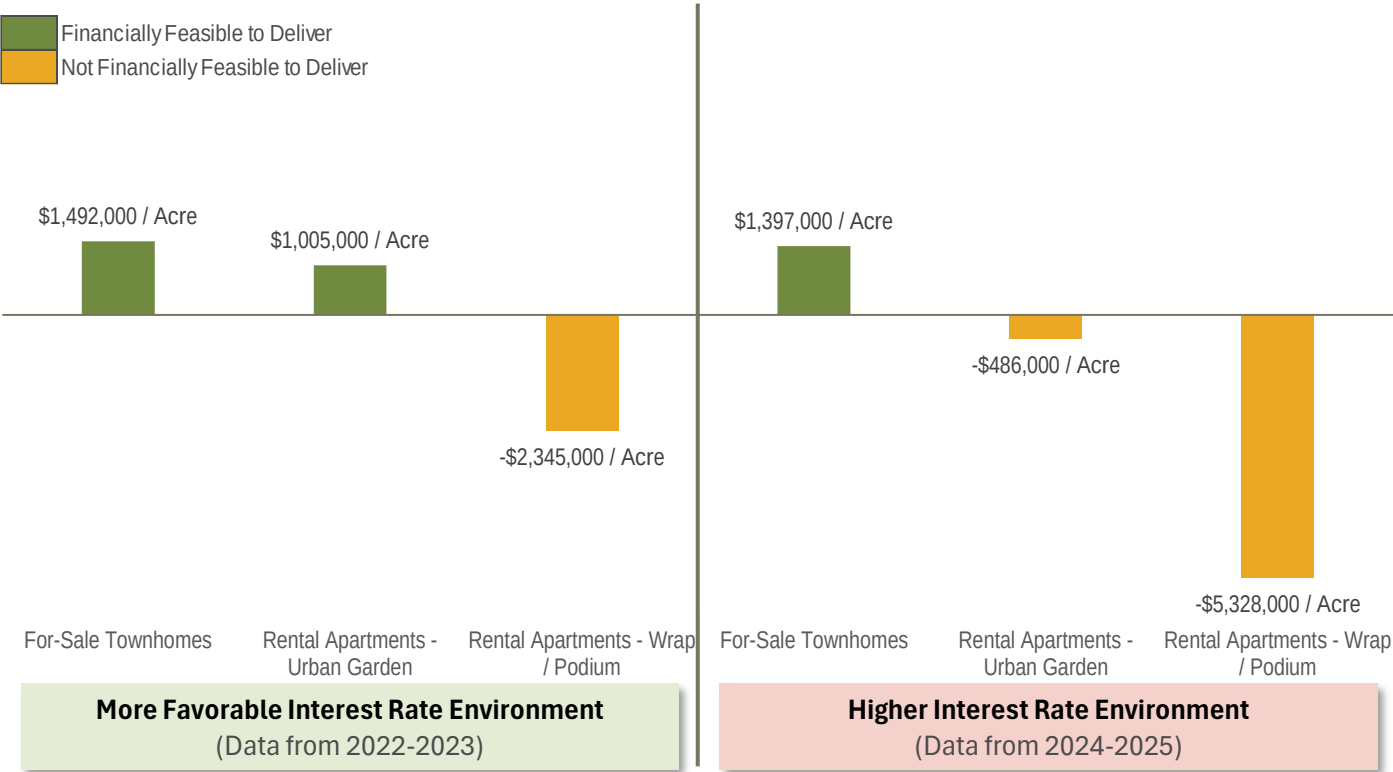
trend is evident in Montgomery County, where CoStar data reveals just 1,921 rental apartment units are now under construction, relative to 4,604 at the end of 2023. For this reason, the findings of the analysis reflect more optimistic conditions than those in place today.

Even with the more favorable assumptions in the 2024 analysis, RCLCO determined several product types commonly found in vertically mixed-use developments—such as office space and for-sale condominiums—were not financially viable at the subject property. In contrast, rental apartments and hospitality uses were found to be feasible, but only when delivered as four- to five-story wood-frame buildings with surface parking, often referred to as “urban garden” product. Due to their wood-frame construction, these buildings cannot support most forms of ground-floor retail, unlike podium or wrap configurations with concrete bases and parking structures. As a result, the analysis concluded vertically mixed-use development is unlikely to be viable at the subject property, even if interest rates return to pre-hike levels.

To validate these findings, RCLCO updated its residual land value analysis using 2024 and 2025 market data to reflect current financing conditions. Under this updated scenario, at this point in time, for-sale townhomes are the only financially feasible form of residential development; even in the more cost-effective urban garden format, rental apartments are no longer viable to construct at the subject property. Denser formats, such as podium or wrap construction, face even greater financial challenges, with little to no path to feasibility in the current interest rate environment. These findings align with broader trends in Montgomery County, where multifamily development has declined significantly in recent years, as noted previously.

Exhibit 1 compares residential residual land values under both interest rate environments. The findings suggest that for-sale townhomes are the only viable residential development option at the subject property at present, but urban garden rental apartments could become feasible if and when interest rates drop. However, podium and wrap apartment formats are likely to remain financially unviable under either scenario.

Exhibit 1
Comparison of Residual Land Values Per Acre of Residential Development by Interest Rate Environment
Subject Property; July 2025



While costs are one side of the residual land value equation, revenues—particularly achievable rents—are the other key lever influencing project feasibility. In both scenarios above, RCLCO used the rent levels projected in its January 2024 strategic market analysis for the subject property as a baseline. To assess feasibility, RCLCO also conducted sensitivity testing to determine the level of rent growth that would be required to support denser residential development at the subject property.

This analysis shows Clarksburg would need to experience unprecedented levels of rent growth to support denser residential development, well beyond what is reasonable to expect in the foreseeable future. In the January 2024 strategic market analysis, RCLCO projected achievable pricing of \$2.30 per square foot for new rental apartment development at the subject property. These rents are far below the thresholds that would be necessary to support podium or wrap construction, both in today's elevated interest rate environment and under more favorable conditions:

- » **Current Conditions:** To support denser apartment development with structured parking and/or ground-floor retail, rents at the subject property would need to reach approximately \$2.95 to \$3.05 per square foot, representing an increase of 30% from current achievable levels. Only a handful of submarkets in Montgomery County—namely Bethesda, Chevy Chase, Silver Spring, Rockville Town Square, and Downtown Crown—consistently achieve or exceed these levels, and all of these areas benefit from significantly more mature, intensively developed, and amenitized environments and offer competitive locational advantages, such as access to larger numbers of households, Metrorail, and proximity to the District.
- » **More Favorable Interest Rates:** Even under more favorable financing conditions, required rents would still range from \$2.60 to \$2.70 per square foot, representing an increase of 15% from current achievable levels. While some additional submarkets in Montgomery County (e.g., North Bethesda, Twinbrook, Wheaton, Shady Grove) meet this threshold, they are all located along Metrorail amid densely populated neighborhoods, reinforcing the value that proximity to high-capacity transit adds to rental apartment pricing. This relationship is well-documented within the Washington, D.C., metropolitan area:
 - o Nearly 30 years ago, a study by John D. Benjamin and G. Stacy Sirmans found that for every one-tenth mile increase in distance from a Metrorail station, apartment rents declined by 2.5%.¹
 - o More recently, apartment communities along the forthcoming Purple Line corridor are already seeing above-average rent growth, particularly for larger unit types, in anticipation of the line's opening in Winter 2027.²

These trends underscore the premium renters place on transit, which improves connectivity and flexibility. Given Clarksburg's lack of these advantages, it is unlikely the subject property can compete with more accessible, centrally located submarkets to achieve the rent levels required to support podium or wrap development in the foreseeable future.

Please see Exhibit 2 for more information on these findings. In short, Clarksburg would need to command rents on par with—or higher than—more centrally located and better-amenitized submarkets to make dense development financially viable. Rents would need to be 15% to 30% higher than they are today, independent of inflation and any other standard market-wide escalations. As such, the economics of structured parking and ground-floor retail within an apartment building remain out of reach for Clarksburg in the near to mid term, even under more favorable financing conditions.

¹ Benjamin, John D. and Sirmans, G. Stacy (1997). Mass Transportation, Apartment Rent and Property Values. *Journal of Real Estate Research*, Vol. 12 No. 1.

² Peng, Q., Knaap, G., & Finio, N. (2023). Do Multifamily unit Rents Increase in Response to Light Rail in the Pre-service Period? *International Regional Science Review*, 47(5-6), 566-590.

Exhibit 2
Comparison of Current Rents and Rents Needed to Support Podium / Wrap Construction by Interest Rate Environment
Subject Property; July 2025

	MORE FAVORABLE INTEREST RATE ENVIRONMENT	HIGHER INTEREST RATE ENVIRONMENT
Rents Achievable at Subject Property ¹	\$2.30 / SF	\$2.30 / SF
Rents Necessary to Support Construction ²	\$2.60 to \$2.70 / SF	\$2.95 to \$3.05 / SF
Rent Growth Necessary to Support Construction	15%	30%
Submarkets Where Product is Achieving Rents Necessary to Support Construction		
Bethesda	✓	✓
Chevy Chase	✓	✓
Silver Spring	✓	✓
North Bethesda	✓	✗
Rockville Town Square	✓	✓
Twinbrook	✓	✗
Wheaton	✓	✗
Glenmont	✗	✗
Downtown Crown	✓	✓
Shady Grove	✓	✗
Gaithersburg / Montgomery Village	✗	✗
Germantown	✗	✗
Clarksburg	✗	✗

¹ Per January 2024 Strategic Market Analysis.

² In 2024 dollars; in other words, rents would need to increase to this level independent of inflation and other market-wide escalations.

COMPARISON TO COUNTY STUDY

A separate study, the COMSAT Financial Feasibility Study conducted by HR&A Advisors, reached almost the very same conclusion regarding the likelihood of denser development at the subject property. Completed in September 2024 for the Montgomery County Planning Department, this study (“the County study”) sought to evaluate whether adaptive reuse of the former COMSAT headquarters building was feasible under current market conditions and the extent to which new development at the subject property could generate additional value to subsidize adaptive reuse. To do so, the County study examined three new development scenarios:

- » Scenario 1 (“Low Density Scenario”): Low-density buildout of site with mix of 722 townhomes, 818 apartments, and 136,376 square feet of retail³
- » Scenario 2 (“Medium Density Scenario”): Medium-density buildout of site with mix of 972 townhomes, 1,471 apartments, and 136,376 square feet of retail³
- » Scenario 3 (“Townhouse Only Scenario”): Low-density buildout of site with 1,188 townhomes only

To evaluate the feasibility of the three new development scenarios, the County study assessed their residual land values—similar to the approach RCLCO used for analyzing individual land uses, but applied here to broader programs for new development at the subject property. The study ultimately found both the Low Density and Medium Density Scenarios were infeasible, generating negative residual

³ Although not explicitly stated, RCLCO assumes the County study envisions the approximately 136,376 square feet of retail as ground-floor space within the apartment buildings. This assumption is based on the absence of separate efficiency or density assumptions—unlike those provided for the townhomes and apartments—and the fact that retail construction costs appear generally aligned with those of multifamily.

land values of -\$40.1 million and -\$154.3 million, respectively. The gap between these two outcomes underscores additional allowable multifamily density does not currently translate into financial value for the subject property, as the associated forms of medium-density development—three to five story buildings—are not economically viable. In contrast, the County identified the Townhouse Only Scenario as the only feasible option under current market conditions, generating a positive residual land value of \$83.4 million. This finding suggests the negative values in the other two scenarios are driven by the inclusion of rental apartments and (presumably) ground-floor retail.³ For additional detail, see Exhibit 3 below.

Exhibit 3
Net Operating Income and Total Value of New Development Scenarios in the County Study
Subject Property; September 2024

	LOW DENSITY	MEDIUM DENSITY	TOWNHOUSE ONLY
Net Annual Residential Income	\$13.6M	\$24.5M	-
Net Annual Retail Income	\$3.0M	\$3.0M	-
Total Net Operating Income	\$16.6M	\$27.5M	-
÷ Blended Cap Rate	5.60%	5.60%	0.00%
Total Project Value (rental)	\$298.0M	\$495.8M	-
Townhouse Sales	\$550.8M	\$741.8M	\$906.7M
Total Project Value (all uses)	\$848.8M	\$1,237.6M	\$906.7M
Less: Total Development Cost	-\$657.0M	-\$1,029.2M	-\$611.0M
Less: Parking Cost	-\$31.2M	-\$84.2M	-
Less: Roads and Open Space Cost	-\$30.9M	-\$30.9M	-\$30.9M
Less: Developer Fee**	-\$127.3M	-\$185.6M	-\$136.0M
Less: Cost of Sale	-\$42.4M	-\$61.9M	-\$45.3M
Total Residual Land Value (gap)	-\$40.1M	-\$154.3M	\$83.4M

In addition to the three new development scenarios, the County study also examined the residual land value of shopping center development, involving 100,000 square feet of retail with surface parking. The County study found this form of development to generate a positive residual land value of \$3.6 million, indicating financial feasibility in today's environment.

Viewed in the context of the full analysis, the findings from the County study underscore that only relatively lower-density development forms—such as for-sale townhomes and shopping center retail—are financially feasible at this time. Even lower-density apartments are currently infeasible, though this form of development is notably closer to feasibility than the medium-density apartment products delivering in more transit-accessible nodes to the south. These conclusions from the County study align closely with RCLCO's residual land value analysis, as summarized in Exhibit 1. In short, both studies point to the same core finding: Denser development is not currently viable at the subject property, and a lower-density approach will be necessary to support construction in the near to mid term.

IMPLICATIONS FOR PROGRAM

As the preceding analysis demonstrates, higher-density development relying on vertical construction types and structured parking is unlikely to be viable at the subject property. Instead, development is more likely to take the form of horizontal formats with surface parking. To ensure timely delivery, site planning should prioritize townhome product in the near term, with wood-frame, surface-parked apartments potentially becoming feasible in the mid to long term. Retail could be viable at any point, though the limited feasibility of vertically mixed-use buildings suggests this use should be planned as standalone product. Otherwise, there is a risk of designing appealing vertical formats the market is not ready to support.

While this approach implies a less intensive form of development in the near to medium term—appropriate for the Clarksburg submarket—it does not need to come at the expense of walkability or placemaking, and it does not need to compromise the objective of facilitating more vertical and intensive forms of development over the long term. Examples like Kentlands Market Square in Gaithersburg, Maryland, and Cascades Overlook in Sterling, Virginia, illustrate horizontal surface-parked retail can still deliver a strong sense of place. Moreover,

this form of development can also introduce a street grid and site orientation that can establish a foundation for future infill and intensification over time. This kind of positioning will be critical to the subject property's success, helping ensure timely delivery while also generating interest once it comes to market and delivering on the County's short- and long-term goals for housing and economic development.

Exhibit C

MEMORANDUM

DATE: September 23, 2025

TO: Lantian Development LLC

FROM: RCLCO

SUBJECT: Role of Planned Interchange in Unlocking Market Potential of Former COMSAT Headquarters Site

INTRODUCTION

As requested, RCLCO has conducted extensive research to guide your efforts to redevelop the former COMSAT Headquarters site in Clarksburg, Maryland. Located east of I-270 and roughly a half mile south of the Clarksburg Road interchange, the approximately 200-acre campus (“subject property”) is home to the now-vacant, 496,000-square-foot COMSAT headquarters building. RCLCO’s involvement in your efforts to redevelop the subject property began in September 2017, when RCLCO completed a highest-and-best use analysis to inform your initial planning efforts. In October 2023, you then re-engaged RCLCO to help develop a market-supported, financially optimized, and fiscally positive redevelopment program. Over the ensuing two-year period, RCLCO has worked closely with you to develop, refine, and strengthen these plans, ensuring they are grounded in market and financial realities while advancing your vision for a best-in-class mixed-use development appropriate for this location. This vision is critically important for, among other things, advancing Montgomery County’s future economic development and expanding its much-needed housing stock.

The purpose of this memo is to summarize the opportunity RCLCO has identified for the subject property and to highlight the critical role of improved accessibility—specifically through the planned interchange at I-270 and Little Seneca Parkway, as envisioned in the *Master Plan of Highways and Transitways*—in unlocking that opportunity. Ultimately, RCLCO determined the subject property is a viable location for the type of best-in-class mixed-use development you aim to create. However, the success of such a vision is likely to hinge on the opportunity for (and thereafter implementation of) the planned Exit 17 interchange. Without the enhanced accessibility the interchange would provide, many commercial concepts are unlikely to be feasible, jeopardizing the potential for a true mixed-use environment and leaving the subject property with opportunities that are primarily, if not exclusively, residential in nature.

SUMMARY OF DEMAND POTENTIAL

In January 2024, RCLCO completed a strategic market analysis for the subject property, a key component of which was to quantify the depth of market demand for various forms of development. To do so, RCLCO constructed a series of statistical demand models to forecast potential demand by land use, unconstrained by the physical capacity of the site. This analysis projected maximum potential demand for up to 1,640 rental housing units, 4,020 for-sale housing units, 240,000 square feet of retail, 1,386,000 square feet of other commercial uses (primarily life sciences), and 150 hotel keys at the subject property through 2040. These findings suggest the vision for a mixed-use development at the subject property is achievable, given current and anticipated supply/demand conditions in the submarket.

However, demand dynamics are only one part of the equation. To further evaluate the feasibility of each use, RCLCO assessed overall “market opportunity” across development concepts. While depth of market was a key input to this equation, other considerations included the locational appeal of the site, the compatibility of proposed uses within a mixed-use environment, and the economic feasibility of development based on prevailing rents and construction costs.

Many of these factors are highly sensitive to the delivery of the planned interchange at I-270 and Little Seneca Parkway. This infrastructure would allow drivers to both see and easily access the subject property, greatly enhancing its development potential. In particular, it would strengthen opportunities for non-residential development, helping to support a more robust retail component and increase the likelihood of landing a significant corporate and/or life science user. For the purposes of this evaluation, RCLCO initially assumed the interchange would remain in the sector plan and be built. Under that scenario, RCLCO reached the following conclusions:

- » Relatively low-density multifamily rentals and for-sale townhomes represent the strongest residential opportunities at the subject property, given the large amount of developable land at the site and the significant depth of housing demand in Montgomery County.
- » Retail presents a strong commercial opportunity, particularly in the case of concepts related to grocery, food and beverage, and services. Although perhaps less obvious of a fit than these concepts, fitness uses show moderately strong potential as well. With the planned interchange, the analysis suggests the subject property could support a significant retail/commercial center, anchored by a grocery store and a fitness center.
 - o Anchor tenants are essential to realizing a retail development of this scale, as they help to generate the foot traffic on which smaller tenants depend. However, attracting these users can be competitive, as they typically evaluate sites across broader regions rather than individual submarkets. The planned interchange is likely to significantly enhance the positioning of the subject property in this regard, given the scarcity of large development sites with direct and highly visible access to I-270 or other interstates in the Washington-Baltimore region.
 - o With the planned interchange, the subject site would benefit from exceptional traffic volumes, helping it stand out as a destination among competing retail locations. Along with population density and parking access, vehicle traffic counts are among the most important considerations for anchor tenants during site selection, enabling them to attract more customers and drive stronger sales. For example, Aldi specifies a minimum daily traffic count of more than 20,000 vehicles in its property requirements.¹ In practice, this threshold may be even higher, as Aldi's three most recently opened stores in Upper Montgomery County (i.e., those portions of the County to the north of I-270 and MD-200) are all located on roads with daily traffic counts ranging from 26,000 to 30,000. According to the Maryland Department of Transportation, an average of 113,000 vehicles pass the subject property daily on this stretch of I-270, far surpassing nearby Frederick Road (fewer than 18,000) and Little Seneca Parkway (fewer than 3,000). These figures suggest the proposed interchange could fundamentally alter the retail/commercial potential of the site by providing access to the type of traffic volumes that many tenants seek.
- » Life science uses present a moderately strong opportunity as well. The commercial/retail center envisioned—most preferably enabled by the interchange—would further increase the attractiveness of the subject property to tenants by offering a more integrated setting, moving beyond the typical suburban model where firms operate in isolation.
 - o Walkable retail significantly enhances the appeal of developments to prospective commercial tenants by supporting talent attraction and retention. As Suketu Shah, Head of UK Life Sciences Property Management at JLL, notes: “Scientists expect a level of experience and comfort on par with other top-tier work environments . . . quality amenities help attract and retain the best talent, which is vital to the success of research.”² The subject property provides this rare opportunity to allow for residential, retail, commercial and office/life science or other space in one central location. It is an opportunity that should be thoughtfully supported and not unduly limited by the upcoming sector plan or other regulatory measures.
 - o Similarly, as mentioned above, life science firms are increasingly prioritizing locations that offer potential synergies over those where they would operate in isolation. Travis McCready, Head of Americas Life Sciences Markets at JLL, notes that life science firms increasingly recognize “a well-organized, economically and culturally supported hub can generate more marketable innovations than any individual company can produce on its own.” For this reason, firms

¹ Property requirements. ALDI. <https://corporate.aldi.us/real-estate/property-requirements>

² Boulton, A. Science Start-Ups Drive Demand for Life-Science Hubs. <https://www.jll.com/en-us/insights/science-start-ups-drive-demand-for-life-science-hubs>

are particularly attracted to districts that support vibrant ecosystems centered on innovation, where life science space is integrated with housing, retail, education, healthcare, and amenities that benefit all users within the ecosystem.³

- » Hospitality and self-storage also show moderately strong potential, though market depth suggests neither use is likely to play a major role in the overall program.

RCLCO also considered an alternate scenario in which the interchange is not delivered. Under this scenario, market opportunity would be significantly constrained:

- » Low-density multifamily rentals and for-sale townhomes would continue to present strong opportunities at the subject property, which would likely remain an attractive residential location with or without enhanced access to I-270.
- » However, the retail/commercial opportunity would be significantly reduced without direct access to I-270, particularly when it comes to securing key destination tenants capable of serving as anchors for neighborhood-serving retail. While the site would still benefit from its proximity to Clarksburg's growing residential base, retail anchors typically prioritize locations with strong traffic volumes, as noted earlier. Without the planned interchange, the subject property would lack this critical advantage, making it far less competitive relative to other sites in the region.
 - o Recent trends in Montgomery County support this conclusion. Over the past five years, six new grocery stores have opened in Montgomery County to the north of I-270 and MD-200, and the average daily traffic count for the roads fronting these stores was 33,000 vehicles. Only one grocery store—Giant on Olney Sandy Spring Road—located on a road with fewer than 26,000 vehicles per day, averaging roughly 22,000. As noted above, these roads all carry more traffic than those near the subject property—except for I-270. While the subject property may achieve densities sufficient to support Bus Rapid Transit (“BRT”), a BRT line serving this location would be unlikely to provide access to enough customers to make up for the lack of direct access to vehicles from I-270.
- » Without anchor tenants, the feasibility of inline retail would diminish, as the site would lack the visitor traffic that smaller businesses rely on. In turn, the subject property would likely struggle to attract the tenants needed to capture the full extent of retail demand, resulting in a much smaller and more limited retail/commercial environment.
 - o Research demonstrates that anchor tenants are essential to the success of retail centers, particularly those that are not in more urban environments. Large retailers—especially grocery stores or other national brands—help attract complementary tenants, establish market credibility, and provide long-term stability.⁴ Anchors generate substantial positive externalities, creating demand spillover in the form of foot traffic and consumer interest that benefits surrounding businesses. Longstanding research indicates that the loss of an anchor tenant can cause rental rates of non-anchor tenants to decline up to 25%.⁵ Without the draw and stability of an anchor, modern-day suburban retail is rarely viable at scale.
 - o Once again, past experience in Montgomery County reinforces this conclusion. In recent years, there have been few successful examples of unanchored suburban retail developments delivering and performing well in the County. The only recent case identified by RCLCO—Spectrum Town Center in Gaithersburg—includes just 14,000 square feet of retail; furthermore, its vertically integrated design (i.e., multifamily over retail) would not be viable in Clarksburg due to significantly lower achievable rents. As such, any retail development without the interchange would likely be limited to a small number of food, beverage, and service providers, insufficient to create the synergies with other on-site uses that the County presumably wishes to see happen.
- » The life science opportunity would also moderate. Although demand along the I-270 corridor would still exist, the site would be less appealing without complementary retail and improved access, reducing its competitiveness.

³ McCready, T. Life Sciences Companies Need an Innovation Hub to Thrive. <https://www.areadevelopment.com/Biotech/q2-2024/life-sciences-companies-need-an-innovation-hub-to-thrive.shtml>

⁴ Shemesh, J. Anchored Shopping Centers: Benefits, Risks, and Key Insights. <https://pointacquisitions.com/anchored-shopping-centers/>

⁵ Gatzlaff et al. The Effect of Anchor Tenant Loss on Shopping Center Rents. <https://www.researchgate.net/publication/5142508>

- » Hospitality uses are unlikely to be viable without the interchange, as ease of vehicular access is a key factor for operators.
 - o Especially in less intensively-developed settings like the upper I-270 corridor, hotels tend to cluster around highway interchanges due to the importance of visibility, access, and convenience in hotel placement. Along the I-270 corridor in Montgomery County, most existing hospitality options follow this pattern, concentrating near interchanges such as I-370, Shady Grove Road, Montgomery Village Avenue, Watkins Mill Road, and Germantown Road. The scarcity of hotels outside these nodes underscores the importance of interchange proximity to hotel performance in the corridor.

For a summary of these scenarios, please see Exhibit 1. As discussed on Page 1, the “market opportunity” for each use in Exhibit 1 is grounded in empirical assessments of its locational appeal, supply-demand balance, mixed-use compatibility, and economic feasibility. In general, uses rated as having a “strong” or “moderate / strong” opportunity are those the market is likely to support without significant external intervention, such as public subsidies or other incentives. By contrast, uses with only a “moderate” opportunity—even if some demand exists—may be difficult to realize. This is because successful real estate development depends not only on market opportunity but also on investor interest, capital market support, tenant appetite, and other enabling factors. Grocery & Drug is a useful example; as noted on Page 2, traffic counts are among the most critical site selection criteria for grocery tenants, and—if a site does not meet their threshold for a “strong” opportunity—they are often more likely to pursue alternative locations in other markets or submarkets rather than compromise on a weaker site. The takeaway is that even when demand appears to exist, realizing that demand may be exceptionally difficult without the right conditions in place.

Exhibit 1
Summary of Development Opportunity by Land Use
Subject Property; January 2024

LAND USE	MAXIMUM POTENTIAL DEMAND (BY 2040)	MARKET OPPORTUNITY (WITH INTERCHANGE)	MARKET OPPORTUNITY (WITHOUT INTERCHANGE)
Rental Housing	1,640 Units		
Rental Apartment	1,420 Units	STRONG	STRONG
Assisted Living / Independent Living	220 Units	MODERATE	MODERATE
For-Sale Housing	4,020 Units		
Single-Family Detached Housing	835 Units	MODERATE / STRONG	MODERATE / STRONG
Townhome	1,730 Units	STRONG	STRONG
Two-Over-Two Condominium	1,040 Units	MODERATE / STRONG	MODERATE / STRONG
Multifamily Condominium	415 Units	MODERATE / WEAK	WEAK
Retail	240,000 SF		
Grocery & Drug	86,000 SF	STRONG	MODERATE
Restaurants	64,000 SF	STRONG	MODERATE / STRONG
Hard & Soft Goods	31,000 SF	MODERATE	WEAK
Entertainment & Fitness	21,000 SF	MODERATE / STRONG	MODERATE / WEAK
Services	38,000 SF	STRONG	MODERATE / STRONG
Hospitality	150 Keys		
Hotel	150 Keys	MODERATE / STRONG	MODERATE / WEAK
Other Commercial	1,386,000 SF		
Office	159,000 SF	WEAK	WEAK
Life Science	1,032,000 SF	MODERATE / STRONG	MODERATE
Self-Storage	195,000 SF	MODERATE / STRONG	MODERATE

Note: Above analysis assumes surface parking for all development concepts. Based on a residual land value analysis, RCLCO concluded structured parking is unlikely to be viable at the subject property for the foreseeable future.

Note: The score for rental apartments was developed prior to the enactment of Montgomery County's recent Rent Stabilization Law, which could impact the locational appeal of the subject site over properties in other jurisdictions if the law leads to challenges in securing financing.

PROGRAM IMPLICATIONS

As the above analysis demonstrates, the planned interchange at I-270 and Little Seneca Parkway is critical to unlocking the potential of the subject property as a best-in-class mixed-use development. Market demand exists to support the scale of retail needed to amenitize the subject property and enhance its appeal to residential, life science, and other users. However, the interchange is likely to be essential to securing the anchor tenants as well as substantial corporate and/or life science users that can bring this vision to life, opening the site to the approximately 113,000 vehicles that travel along this stretch of I-270 each day. These traffic volumes far exceed those available without the interchange and surpass those of many competing sites across the Washington-Baltimore region, significantly improving the appeal of the subject property to anchor tenants and large scale, highly desirable corporate users. With these anchor tenants (and possibly corporate users) in place, the subject property would be well-positioned to support the scale of retail and broader commercial activity envisioned by RCLCO, helping to establish a dynamic mixed-use destination that would generate substantial economic development for the County.

Without the interchange however, the outlook changes significantly. Absent improved access, the subject property is unlikely to attract the anchor retail (and commercial) tenants needed to support a full retail program, regardless of the amount of market demand that may be available to it; based on similar projects in Montgomery County, the retail component would likely be limited to 10,000 to 20,000 square feet, sufficient for only a handful of small-format tenants. This smaller retail program would weaken the site's competitiveness for life science users, who increasingly seek walkable, mixed-use environments, and could result in reduced demand or slower absorption. A hotel user would also be unlikely to consider the site without clearly visible and direct highway access, limiting the feasibility of capturing projected hospitality demand. In this scenario, the site would likely default to a more limited development program focused primarily—if not exclusively—on residential uses, which are less sensitive to regional access but still benefit from strong local demand.

Ultimately, the planned interchange is more than just a transportation improvement—it is essentially the linchpin for realizing a successful, mixed-use vision at the subject property. With it, the subject property will be far better positioned to support quality development that benefits future users, nearby residents, and the County, and to foster a more vibrant, connected place.

Exhibit D



MEMORANDUM

To: Bob Elliott
River Falls Investments, LLC

From: Will Zeid, PE
Danny Davis, PE
Ben Doran, PE
Kimley-Horn and Associates, Inc.

Date: October 3, 2025
Conceptual Phased Interchange Evaluation

Subject: Exit 17 – Little Seneca Parkway and I-270
Clarksburg, Maryland

INTRODUCTION

This memorandum presents a high-level discussion of a potential phasing strategy for achieving full interstate access at planned Exit 17 with the future extension of Little Seneca Parkway over I-270 in Clarksburg, Maryland. A full feasibility analysis would be needed to provide a more in-depth analysis of the actual constructability and costs of specific design characteristics for both the bridge and ramps. However, several examples of multi-phase implementations of interchanges are discussed herein to illustrate how a bridge can be installed and later improved to add ramps to the elevated bridge structure.

The Exit 17 interchange has been a long-standing recommendation on the County's Master Plan of Highways and Transitways. However, the interchange designation is proposed to be removed and replaced with a bridge-only recommendation without access to I-270 in the current Clarksburg East Sector Plan (the "Plan") draft.

Without Exit 17, the through-traffic demand and new development density envisioned in the draft Plan along Observation Drive is likely to demand a full four-lane section along the full length of Observation Drive, restricting the ability to convert lanes to BRT in the future. However, allowing for the possibility of adding access to I-270 at Little Seneca Parkway would provide an alternative access point to I-270 for future development along Observation Drive, and this would in turn reduce demand along Observation Drive to potentially accommodate the reduction to two travel lanes for vehicular traffic and two BRT lanes, a key goal of the Plan. The reduction in vehicle demand along Observation Drive would also reduce intersection capacity needs to the north at Clarksburg Road and provide a lower stress environment for pedestrians and cyclists moving along the Observation Drive and Clarksburg Road corridors.

For the Exit 17 Little Seneca Parkway intersection with I-270, the Plan should not recommend **either** a bridge **or** a full interchange but rather allow for both alternatives. If future conditions do not warrant

or otherwise necessitate interstate access at Little Seneca Parkway, then ramps would not be mandated or installed. Alternatively, if future conditions do necessitate I-270 access, whether driven by transportation infrastructure needs, economic development or other criteria, then there should be foresight now to include an allowance in the Plan for the installation of ramps to connect to I-270. The Plan should not implement recommendations that could ultimately be the cause for key plan goals to be unreachable, such as the active and intentional removal of interstate access adjacent to the properties expected to provide much of the future growth within the Plan area. The recommendation should be structured to respond to the dynamic needs of the Plan area that will evolve as development proceeds and traffic demand can be more accurately forecasted to match the future densities that are being realized.

This assessment supports an improved recommendation that would maintain the baseline bridge recommendation as an initial phase and then allow for future, or potentially even concurrent, phases of construction to add ramps for direct access to I-270. There are numerous examples of ramps being added to existing elevated bridge structures throughout the DC Metro Region, many of which were not likely accounted for in the initial bridge designs. Planning ahead to accommodate future ramps when the bridge is designed would likely provide cost benefits and construction time savings if the ramps were constructed in the future. This approach offers several planning, funding, and operational advantages that align with the long-term goals of the current draft Plan.

PHASED INTERCHANGE PRECEDENT

Several examples can be cited where a phased approach was taken to add ramps to an already existing or recently constructed elevated bridge structure. In each of these examples, the bridge structure was constructed first without ramps, or with only some ramps, and additional ramps were added after the initial bridge construction. In some cases the ramps were added sequentially within a single overall project, while in other cases, ramps were added decades after initial bridge construction which likely did not envision or account for ramps in the original bridge design. Planning for ramp additions with the initial bridge design would likely result in significant reductions in costs, demolition, environmental impacts and construction time when ramps are added in the future. The following examples are detailed further in this memorandum:

- I-495 at Gallows Road – Virginia
- I-95 HOV Ramp Connection to Heller Road – Virginia
- I-270 Spur Ramp Connection to Westlake Terrace – Maryland
- I-95 Express Lanes Ramp to Opitz Boulevard Bridge – Virginia
- I-495 Express Lanes Ramp to Lee Highway Bridge – Virginia

Several of these examples include median ramp additions (left hand exit), which could be further explored as an alternative to standard diamond ramps for the southbound I-270 on and off ramps at Little Seneca Parkway to avoid building elevated ramp structures over the stream valley on the west side of the interstate. For the northbound ramps, it is anticipated that standard tight diamond on and off ramps would be constructed on the east side of the interstate at grade ramping up to tie in east of the elevated bridge structure.

Example 1: I-495 at Gallows Road – Virginia

Project Overview: The existing Gallows Road Bridge was replaced with a new steel bridge structure, as shown in Figure 1 below. The initial phase included construction of the bridge only. The graded median ramp structure was then added and tied into the already constructed bridge structure, as shown in Figure 2. The overall project was constructed in sequence where the bridge design accounted for the addition of ramps.

The northbound ramps were constructed in a tight diamond configuration, similar to what could be envisioned for the northbound I-270 ramps at the Little Seneca Parkway interchange, as shown in Figure 3. Further, the median ramps provide an example of a potential alternative that may promote the reduction of environmental impacts to the stream valley located on the west side of I-270.



Figure 1: Before New Bridge Structure



Figure 2: With New Bridge Structure (2011)



Figure 3: With Median Ramp Addition & Tight Diamond on East Side (2011)



Example 2: I-95 HOV Ramp Connection to Heller Road – Virginia

Project Overview: The existing I-95 HOV ramp elevated bridge structure existed as a standalone ramp, as shown in Figure 4 below. A new bridge across I-95 was constructed and tied into the existing modified HOV bridge structure, as shown in Figure 5.



Figure 4: Existing HOV Bridge (2012)



Figure 5: With New Bridge Connected (2014)

Example 3: I-270 Spur Ramp Connection to Westlake Terrace - Maryland

Project Overview: The existing Westlake Terrace (Formerly Fernwood Drive) overpass existed as a standalone bridge, as shown in Figure 6 below. The bridge was widened and a new I-270 spur median ramp was added, as shown in Figure 5.



Figure 6: Existing Bridge w/o Ramps (2002)



Figure 7: With Median Ramps Added (2004)

Example 4: I-95 Express Lanes Ramp to Opitz Boulevard Bridge – Virginia

Project Overview: The existing Opitz Boulevard elevated bridge structure existed as a standalone bridge structure without elevated ramp connections, as shown in Figure 8 below. A new graded median ramp was constructed and tied into the existing modified bridge structure, as shown in Figure 9.



Figure 8: Existing Bridge (2022)



Figure 9: With New Median Ramp Addition (2024)

Example 5: I-495 Express Lanes Ramp to Lee Highway Bridge – Virginia

Project Overview: The existing Lee Highway elevated bridge structure was replaced in a phased process with the bridge structure constructed first, as shown in Figure 10 below. The graded median ramp was then constructed and tied into the bridge structure, as shown in Figure 11. While this occurred in sequence, the ramp could have been added years later without major modifications to the bridge structure since the design intended for the ramp to be installed.



Figure 10: Bridge Constructed First (2011) Figure 11: With Median Ramp Added (2012)

CONCLUSION

As development progresses in the Plan area, transportation conditions and demands will evolve. A dynamic plan for future roadways and connectivity will be a key factor in the success of achieving the development density, roadway character and multi-modal connectivity envisioned in the Plan. The previous 1994 plan recommendation for an Exit 17 I-270 interchange at Little Seneca Parkway should not be abandoned. If an overpass bridge were to be constructed, then the Plan should support the design future consideration of adding ramps to provide direct interstate access as they may be needed to achieve the Plan vision. This proposed modification is not to guarantee that ramps will be constructed but rather to recognize that they may be needed and provide a framework under which interstate access could be marketed, pursued and ultimately achieved.

The examples provided in this review demonstrate that both existing and newly built bridge structures can be modified or initially designed to add elevated and structured ramps after the construction of the initial bridge structure. Designs for the Exit 17 Little Seneca Bridge construction should include plans and necessary accommodation for the future addition of ramps to northbound and southbound I-270. Installation of the bridge without consideration of future ramp additions could result in unnecessary additional impediments and both financial and environmental constraints.

The current draft recommendation to remove the interchange designation for Little Seneca Parkway at I-270 (Exit 17) and replace with a bridge-only recommendation should be modified to recognize the potential need for I-270 access via the addition of on and off ramps to the future Little Seneca Parkway Bridge. The failure to include such an allowance could ultimately be the cause for key plan goals to be unreachable.

Exhibit E

COMSAT Property Testimony

[Opening Slide] Chairman Harris, members of the Planning Board, my name is Bob Elliott representing River Falls, owner of the 204-acre COMSAT property. I'm here today not just as a developer, but as someone who grew up in Montgomery County and is now raising children here—someone invested in getting this right for the long term.

Montgomery County stands at a crossroads. We can continue watching major employers choose other jurisdictions, or we can seize a transformative opportunity right in front of us. The COMSAT property represents the largest single development opportunity in the Sector Plan—204 acres of unified ownership with over 3,600 linear feet of I-270 frontage.

[Economic Development Slide] We are not alone in the urgency for getting this plan right. Soon you'll hear from MCEDC Director, Laurie Babb. She briefed this board on July 31, 2025, and will speak to the extreme importance of protecting the economic viability of this site. If this County expects to have a real seat at the table when Fortune 500 companies are looking for a place to grow, then we cannot allow this property's potential to be compromised. This is the only site with the scale, location, and infrastructure to attract major employers.

This is our moment to change that trajectory. It's time for us to get in the game and "play to win" big opportunities.

Critical Issues

[Critical Issues Slide] We believe the Sector plan suffers from two fundamental problems. First, the plan removes even the possibility of an interchange. And without direct access to I-270, the COMSAT site cannot achieve its true economic potential. It's a necessity to attract the high-quality employers we all want in Montgomery County.

Second, the Sector Plan layers on constraint after constraint. Taken individually, each seems minor. But collectively, they shrink our 200-acre property into fewer than 50 acres of developable land. That is not a recipe for a transformative project—it's a blueprint for failure.

What Success Looks Like vs. What Failure Costs

[Program Slide] If developed properly, one option for COMSAT would be to generate 1,700 new homes, more than 750,000 square feet of commercial space, 1,700 permanent jobs, 3,600 construction jobs.

[Success Slide] This would result in \$449 M dollars in County revenues over 20 years.

[Cost of Delay Slide] Each year of delay costs the County \$18-20 million dollars.

[The Only Parcel We Have Slide] Our broker CBRE has submitted this site for 6 national solicitations and presented to more than 50 Fortune 500 companies, each representing potential investment exceeding \$1 billion dollars. The uncertainty over historic preservation of the COMSAT building was often the deal breaker. It seems we may be close to resolving that barrier. But new barriers are being erected that will prove to be an equally insurmountable roadblock.

Historic Preservation: A Model for Collaboration

[HP Collaboration Slide] Before outlining those barriers, we want to recognize the thorough research and professional work that went into the Historic Preservation Technical Staff's review of the COMSAT building. Preservation Staff provided a clear recommendation that the building should not be designated historic.

We agree with and support that conclusion. I want to thank Rebecca Ballo and John Liebertz for their professionalism. This shows that collaboration works.

Now that historic designation is closer to being resolved, we want to ensure the opportunity it unlocks is not undone by extraordinary planning constraints. COMSAT was a place where innovation happened. Let's make sure this property continues to embody that forward-looking lens.

The Fatal Flaw: Access Equals Economic Viability

[Access = EV Slide] The draft plan's most damaging decision is eliminating the potential for direct access to I-270 via Exit 17. The County wants smaller streets with tighter ROWs to create walkable environments. But without Exit 17, massive traffic volumes potentially as many as 30,000 to 60,000 daily trips will overwhelm

local roads, creating exactly the opposite of the walkable community this plan envisions.

[Aerial Slide] An interchange isn't just about creating a walkable community, it's also about economic viability.

Site selection follows predictable patterns. Fortune 500 employers and regional retailers demand access, visibility, and infrastructure. They will not risk investments where customers and employees cannot easily reach them. Without the interchange, Clarksburg remains just another housing subdivision inaccessible to the more than 120,000 vehicles passing daily on I-270.

[County Analysis Slide] On June 5th, your own transportation staff presented analysis showing that the interchange resolved the worst traffic condition, the PM peak at Clarksburg Road. Their analysis demonstrated that the addition of an interchange was clear improvement.

[Interchange Analysis Slide] Staff failed to also consider the positive ECONOMIC DEVELOPMENT impacts in their recommendation.

[Simple Economics Slide] Time is a critical resource for employers and employees alike. For businesses, saved time translates into productivity; for individuals, it provides more hours for family, health, and a better quality of life. On June 5, Transportation Staff provided this Board with time-saving comparisons both with, and without, the interchange. According to Staff, a new interchange saves 3 minutes per trip. If that were the case, then the value of human capital time savings equates to \$9.3 million dollars. And this analysis only included NEW residents of the Sector Plan. Existing residents and other retail users would result in additional benefits!

We reviewed their analysis and believe the time savings are 10 minutes or more. That would equate to a benefit of \$31.1 million in time savings. Individually, 3-10 minutes sounds like a small amount, but collectively, it results in a MASSIVE benefit.

Staff recommended the inclusion of the Little Seneca I-270 overpass. The bulk of the expected cost of an interchange is the overpass bridge itself. Simply adding those ramps (which cost nowhere near \$31 million) results in the human capital “payback” is less than 1 year. We should be leveraging our I-270 accessibility, not avoiding it. Even MCDOT agrees with us.

Death by Regulatory Accumulation

[Slide – Sector Plan Area] The draft plan treats our property as if it's 200 acres of opportunity. But when you look closer, that opportunity keeps shrinking. A sentence here calls for a buffer. Another line sets aside a park. Afforestation, setbacks, and carve-outs chip away at the site.

[204-Acre Slide] Starting with 204 acres, each requirement suffocates its viability:

- **[SVB Slide]** Stream Valley Buffer: 22.5 acres
- **[SVA OSSlide]** Stream Valley Adjacent Open Space: 18.8 acres
- **[Old MP Road Slide]** Per the 1993 Plan, Master Plan Roads: 11.2 acres
- **[New MP Road Slide]** In the new Plan, Master Plan Roads: 16.2 acres
 - We lost 5 developable acres to “do the right thing” when it benefits MCPS, another private landowner and of course, our environment.
- **[I-270 ROW Slide]** I-270 Right-of-Way: 8.3 acres
- **[200’ Buffer Slide]** 200-foot buffer requirement, which includes 50’ Tree Buffer: 18.3 acres
- **[Forest Slide]** Forest Stand preservation: 18.5 acres
- **[Park Slide]** Local Park dedication: 10 acres
- **[Dev ROW Slide]** Development rights-of-way: 19.9 acres
- **[Green Cover Slide]** 35% Green Cover mandate: 26.7 acres

[Cumulative Slide] 204 acres becomes fewer than 50 acres of developable land – less than 25% of the total site.

[County Diagram Slide] On page 62, the County Staff shared their own conceptual diagram. But that diagram is physically impossible because it ignores the many layers of restrictions in the Sector Plan.

[Constraint Comparison Slide] The County’s land yield would be worse than ours. The Planning Board needs realistic analysis showing cumulative impacts, not individual requirements presented in isolation. This Board and the community need to see the real effect of stacked rules on developable land. As drafted, the plan never reveals it.

Learning from Success: Park Potomac and Rio

[Park Potomac Slide] The County has always treated I-270 frontage as an asset, not a liability. But in this Sector Plan, I-270 adjacent properties are subject to both a mandated 50' tree buffer and a 200' residential setback. Neither requirement is consistent with the most successful developments in our County.

Take Park Potomac, where the most recent phase sites townhomes and retirement communities less than 75 feet from I-270. Noise is managed via sound walls, but the property maintains commercial visibility which makes it viable.

[Rio Slide] Rio offers another lesson. It is one of our most successful mixed-use destinations, managing I-270 noise and quality of life through design while preserving visibility for commercial vitality. Rio's owners recently submitted plans for four new infill buildings, two are located between I-270 and the lake's edge, and the lake edge is closer than the buffer requirement in Clarksburg.

If Rio and Park Potomac work this way, why must COMSAT be pushed back more than twice as far?

Both projects demonstrate that visibility drives viability. Environmental challenges near highways are real, but proven solutions exist in sound walls, advanced insulation and enhanced air filtration. We should apply those tools, not layer on two massive buffers that erase opportunity.

Equity in Mixed Use Development

[Equity Slide] This County constantly talks about Equity. But what does that mean in the context of mixed-use development?

Both the County's consultants at HR&A and our team at RCLCO concluded that structured parking, podium construction, and high-rise residential are not financially viable in current market conditions. RCLCO's analysis shows that to support structured parking and vertical mixed-use development, rents at COMSAT would need to increase thirty percent from current achievable levels.

Only a handful of submarkets in Montgomery County, like Chevy Chase, Bethesda and North Bethesda consistently achieve these rents, and all benefit significantly from Metrorail which allows for increased density. In these submarkets, mixed use

occurs vertically, but in Clarksburg, 11 miles north of the Shady Grove Metro, developments are mixed horizontally, not vertically, to be economically viable.

While this seems obvious, it bears repeating because this Sector Plan repeatedly encourages development typologies that are not viable. Equity means giving all parts of our county the RIGHT type of mixed-use — not the SAME type of mixed-use.

[Kentlands Slide] Kentlands, another of this County's most celebrated communities, was developed almost 40 years ago using horizontal development formats and surface parking. A model of new urbanism, it is auto-centric and surface-parked. Retail and parking have begun infilling as market conditions matured, but this is happening very slowly.

Slide: Regulatory Overreach

Everyone supports environmental protection, but the draft plan imposes layer upon layer of restrictions that whittle away at the opportunity for responsible development. County law already requires strict forest replacement at a two-to-one ratio. The draft plan goes further, freezing 22 acres of forest - including land in the middle of our site - and adding a 35 percent green cover mandate that excludes existing trees as well as the dedication of new trees in the ROW. Staff assumes green roofs can make up the difference with vertical typologies. But as previously mentioned, Clarksburg requires horizontal wood-frame to be viable.

This plan lifted the concept of Urban Green (Green Cover) from Bethesda but then excludes forest and dedications – park and roads. Doing so, does not count an 25% to 35% of green cover that should apply.

The cumulative impact of these restrictions is serious. Existing laws already ensure rigorous environmental protection. This isn't environmental protection, it's regulatory strangulation.

Parks: Constellation Concept of Parks

[Constellation Alt Slide] Parks and recreation facilities are essential, but there's a better approach than concentrating large facilities in single locations. Our alternative is the Constellation concept: a series of smaller parks linked by trails, distributed across all the properties in the sector plan, including places like the unused elementary school site.

[Constellation Park Slide] Spreading this “String of Pearls” throughout the Sector Plan would create better and equitable access for existing residents. Our concept would deliver a network of spaces that is connected by sidewalks, trails and bike routes, and accessible from multiple directions. Smaller, distributed parks would better align with walkability goals, enhance neighborhood access, and create a green network that ties the 1,000-acre Sector Plan community together.

Learning from Past Mistakes

[Learning Slide] The 1994 Clarksburg Master Plan promised balanced development but delivered primarily housing without supporting employment or infrastructure. Remote centers create challenges for retailers. Lack of employment caused in the bedroom community we see today resulting in long commutes, traffic congestion, and fiscal imbalance.

We cannot repeat those mistakes.

COMSAT offers a chance to build I-270 accessible development done right, but it requires planning that works with market forces, not against them.

The Tip of the Iceberg

[Tip of the Iceberg Slide] The issues outlined today are “the tip of the iceberg”. In a 100+ page planning document, many impactful restrictions appear as single sentences or brief paragraphs scattered throughout. I have used the time allotted to focus on just some of the most critical barriers to success, but other issues, such as the “I-270 Wildlife Bridge Crossing” or the “50% Parking Lot Tree Cover” have gone undiscussed. Our silence on unmentioned issues should not be interpreted as acceptance—these must be resolved as this process moves forward.

What We Need: Specific Solutions

[Solutions Slide] To unlock COMSAT's potential and deliver the economic benefits Montgomery County needs, we request five critical adjustments:

First, preserve Exit 17 as an alternative in the sector plan.

Second, limit excessive land takes.

Third, create a framework for economic development.

Fourth, implement the Constellation Concept for parks.

Fifth, plan for market-viable development typologies.

Closing: This Generation's Choice

[Closing / Choice Slide] Over thirty years ago, promises were made about Clarksburg that weren't kept. Today, we can choose whether to repeat those mistakes or learn from them. This isn't just about one property—it's about whether Montgomery County positions itself for economic growth or accepts continued decline in competitiveness.

The COMSAT property embodies a legacy of innovation and provides unmatched potential. Let's honor both by working together to create a framework for success.

[Slide]

Thank you.

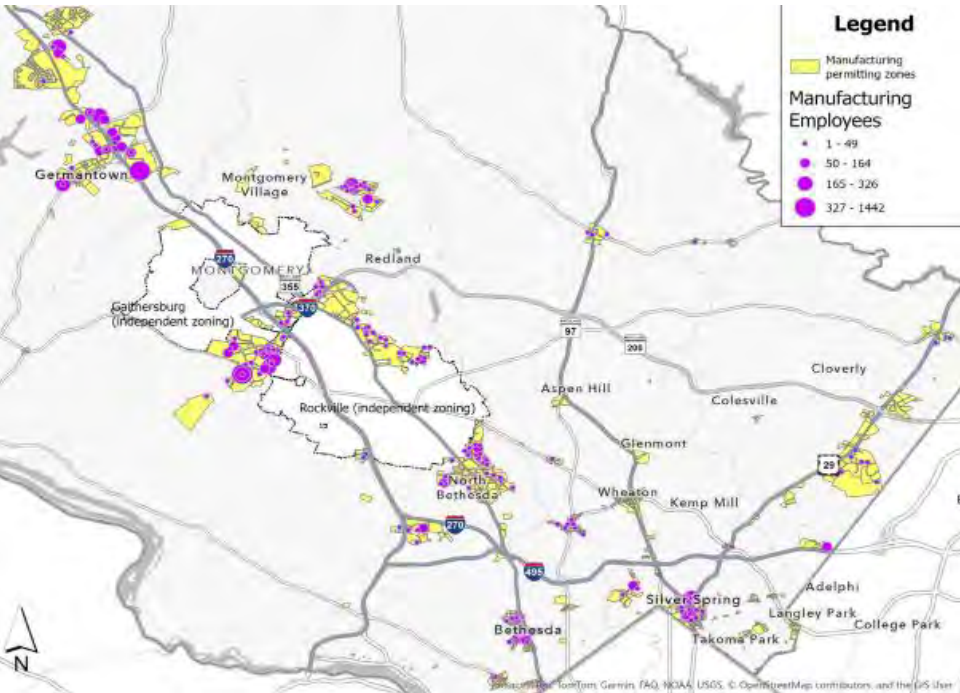


**COMSAT
PROPERTY**

**CLARKSBURG GATEWAY SECTOR PLAN
PUBLIC HEARING TESTIMONY**

RIVER FALLS INVESTMENTS LLC

ECONOMIC DEVELOPMENT



**MANUFACTURING EMPLOYEE HEAT MAP
BUSINESS, EMPLOYMENT AND WAGE DATA
MCEDC DECK JULY 31, 2025**

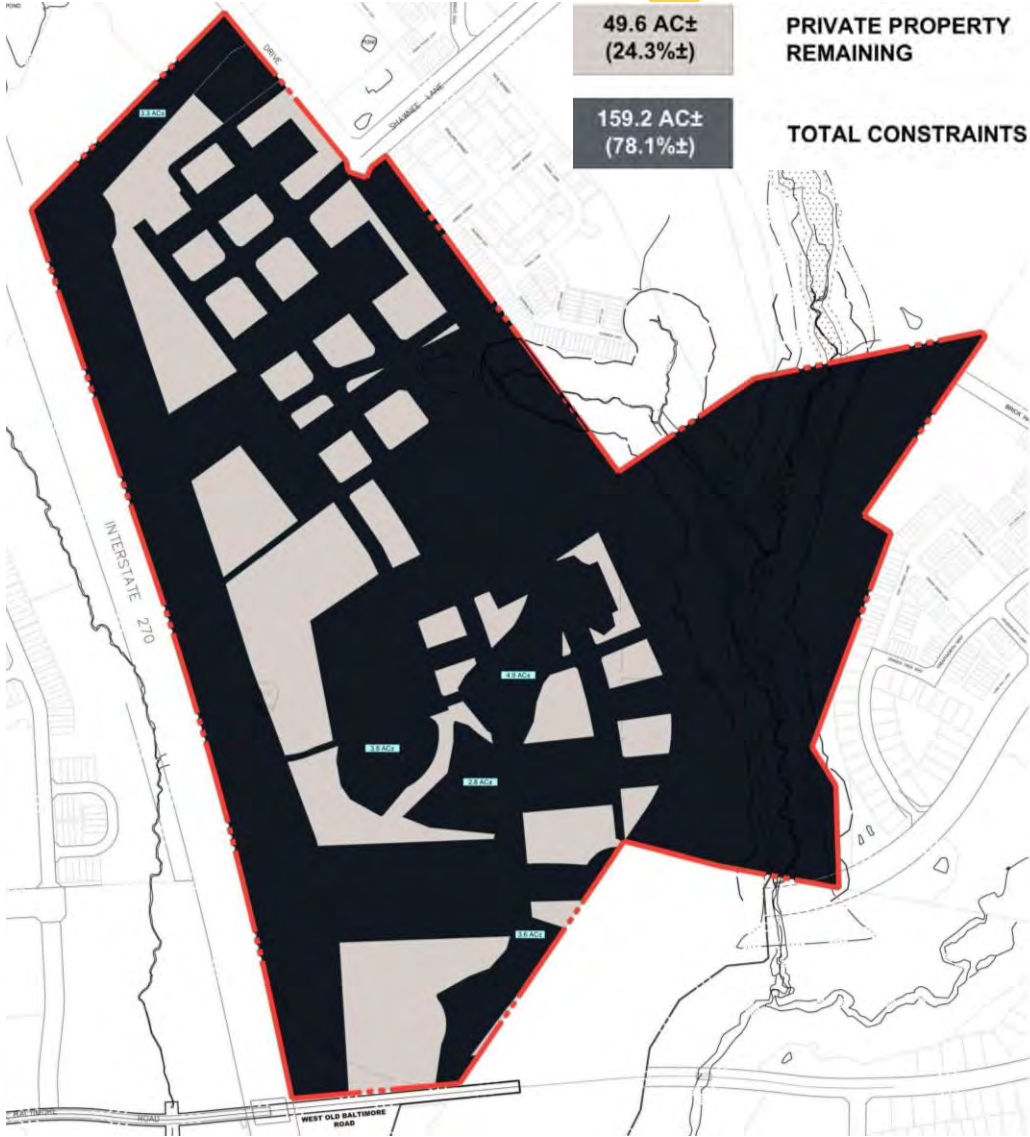


**COMSAT LABS: NEXT GENERATION
FORTUNE 100 LIFE SCIENCE CAMPUS**

CRITICAL ISSUES

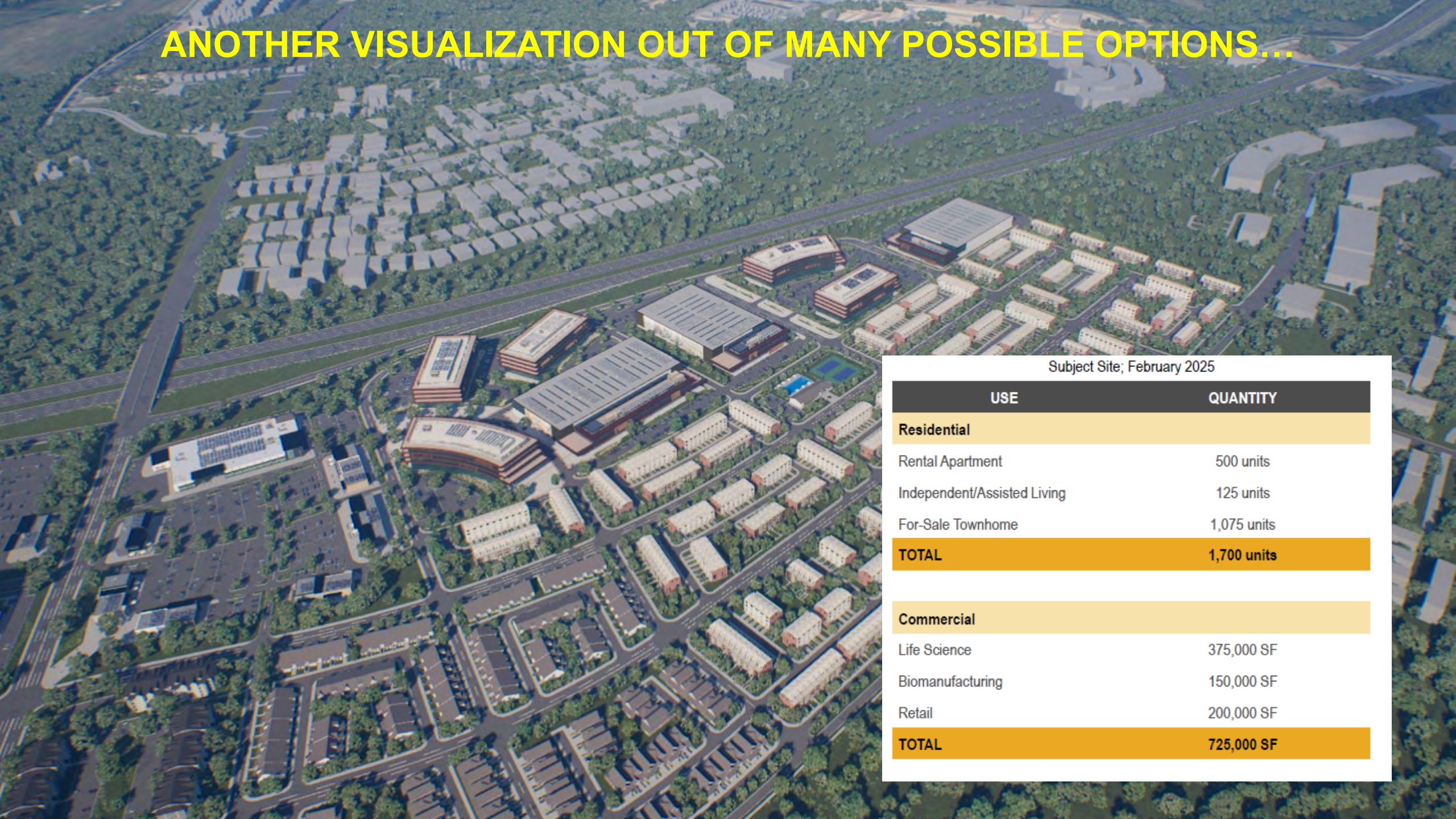


NO INTERCHANGE OPTION



EXCESSIVE LAND TAKES

ANOTHER VISUALIZATION OUT OF MANY POSSIBLE OPTIONS...



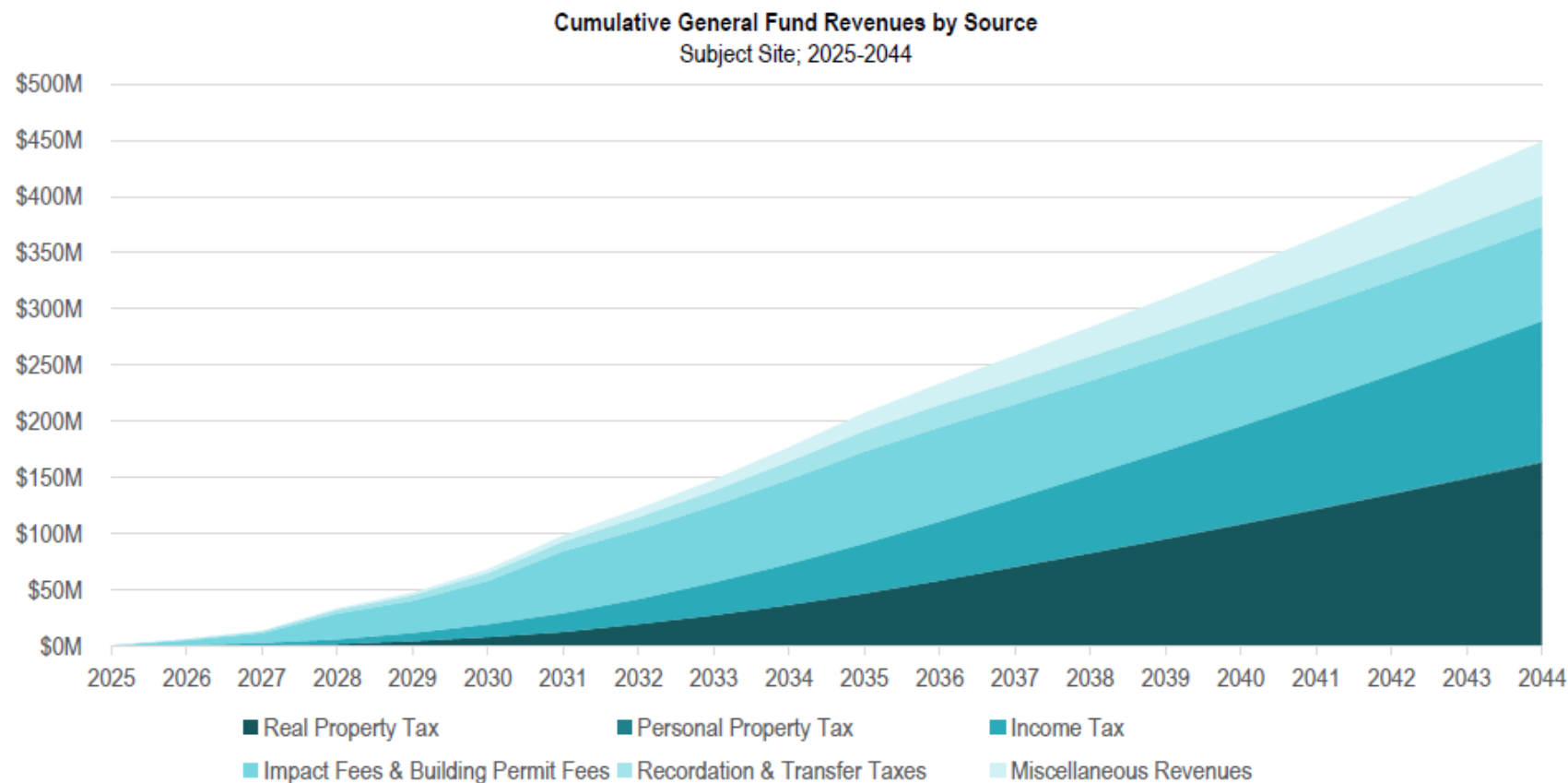
Subject Site; February 2025

USE	QUANTITY
Residential	
Rental Apartment	500 units
Independent/Assisted Living	125 units
For-Sale Townhome	1,075 units
TOTAL	1,700 units
Commercial	
Life Science	375,000 SF
Biomanufacturing	150,000 SF
Retail	200,000 SF
TOTAL	725,000 SF

WHAT SUCCESS LOOKS LIKE

Assuming development begins in 2025, the subject site is poised to generate a cumulative total of **\$449 million** in revenues to Montgomery County over the next 20 years

General Fund revenues are expected to stabilize in Year 12, when all planned buildings have delivered and achieved stabilized occupancies. While Impact Fees and Building Permit Fees are expected to represent a large portion of General Fund revenue generation during the early years of development, on-site households and businesses are poised to unlock new sources of revenue over the mid to long term.



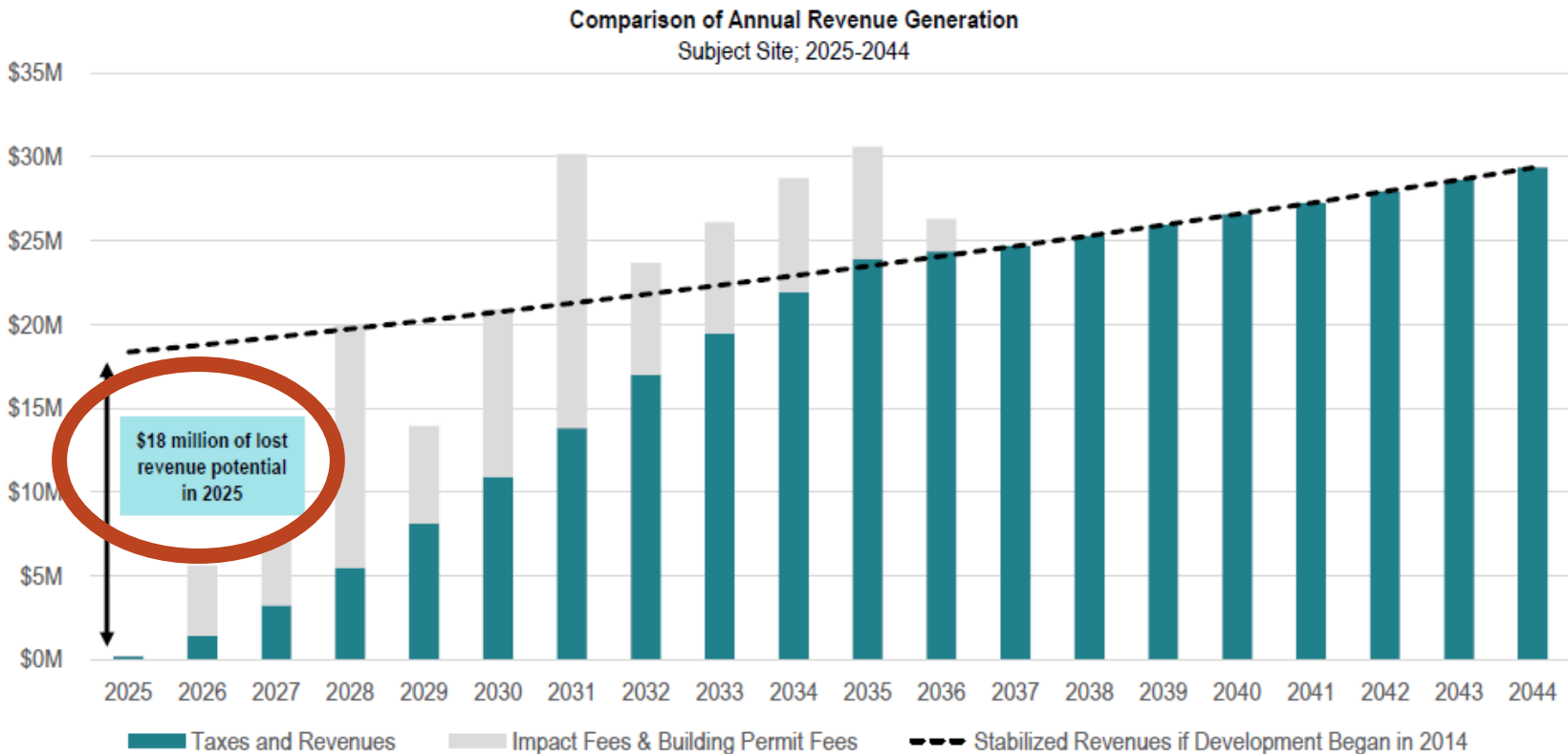
Note: General fund revenues are shown in future dollars, considering inflation and other market escalations that are likely to occur over the next 20 years.

Source: RCLCO

THE COST OF DELAY

Each year that development does not take place at the subject site represents another year it will take for it to reach its stabilized revenue potential

If development had begun in 2014, the subject site would have been fully stabilized by 2025, with all on-site development having reached stabilized occupancy rates. At this point, the subject site would be on track to generate stabilized annual revenues of \$18 million per year in 2024 dollars. However, with development beginning in 2025, revenues to Montgomery County would still be in a ramp-up phase, as most residential and commercial space would not be delivered until later in the development timeline. This juxtaposition highlights the benefits of developing the site—and allowing it to reach its stabilized revenue potential—sooner.



Note: Retroactive revenues are shown in real dollars, adjusting for inflation that has occurred in the last ten years.

Source: RCLCO

“THE ONLY PARCEL WE HAVE”

Comsat Property

CBRE

CBRE, Inc.
1900 N Street, NW | 7th Floor
Washington, DC 20036

+1202 585 5544 Tel

www.cbre.com

Date: January 21, 2025

To: Historic Preservation Commission
c/o Montgomery County Planning Department
2425 Reedie Drive, Floor 13
Wheaton, MD 20902

From: **Tommy Cleaver**
Executive Vice President
CBRE | Life Sciences Mid-Atlantic
Leader

Dear Members of the Historic Preservation Commission:

Our firm, CBRE Group Incorporated (CBRE), the world's largest commercial real estate services firm, has been actively involved in the representation and leasing of Lantian Development's Comsat property since 2021.

My team is widely regarded as the leader in the Office and Life Science space with 72% market share and over \$3B worth of transactions since 2021, including deals with AstraZeneca, GlaxoSmithKline, Emergent Bio, Illumina, Charles River Labs, NIH, NIC, among many others.

We took this assignment because of our conviction in its potential. Comsat is a rare property encompassing over 200 acres in coveted Montgomery County with over 3,600 feet of I-270 frontage. Properties of this scale and size rarely exist and are in high demand due to their flexibility and potential for large scale development. Despite a long list of accolades, the Comsat property has remained vacant for over 20 years. This stagnation is not due to a lack of interest or the absence of effort from either Lantian or CBRE.

Since CBRE was engaged, the property has remained a top priority for our team. We have submitted the site for 6 formal national solicitations and presented to over 50 additional Fortune 500 companies and large-scale privately held life science users – virtually all have expressed sincere interest.

While these contemplated transactions vary in their potential outcomes, all would have resulted in material commitments (anywhere from 500,000 to 2,250,000 million square feet of life science space) with \$1B+ of total investment and significant job creation.

In parallel with these efforts, we have spoken with both the prior and current Governors for the State of Maryland, their Commerce teams, as well as the current Montgomery County Executive and MCDC about the potential for this property. We have completed over 20 site tours, custom renderings, concept plans and conducted extensive outreach to market the property globally.

After digesting the feedback from several early site tours, CBRE recommended a comprehensive interior demolition project to facilitate the property visits and enable easier visioning of a repurposed building. Lantian subsequently hired a contractor to perform over \$1 million in select interior demolition to

We took this assignment because of our conviction in its potential. Comsat is a rare property encompassing over 200 acres in coveted Montgomery County with over 3,600 feet of I-270 frontage. Properties of this scale and size rarely exist and are in high demand due to their flexibility and potential for large scale development. Despite a long list of accolades, the Comsat property has remained vacant for over 20 years. This stagnation is not due to a lack of interest or the absence of effort from either Lantian or CBRE.

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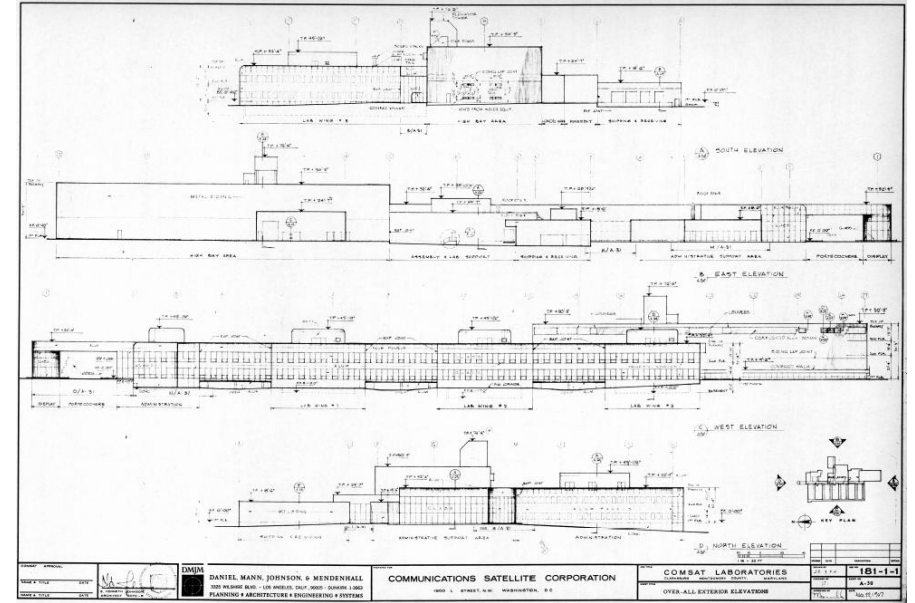
COMSAT LABS: BEST IN CLASS LIFE SCIENCE



PRESERVATION: A MODEL FOR COLLABORATION



PHOTOGRAPH



DOCUMENT

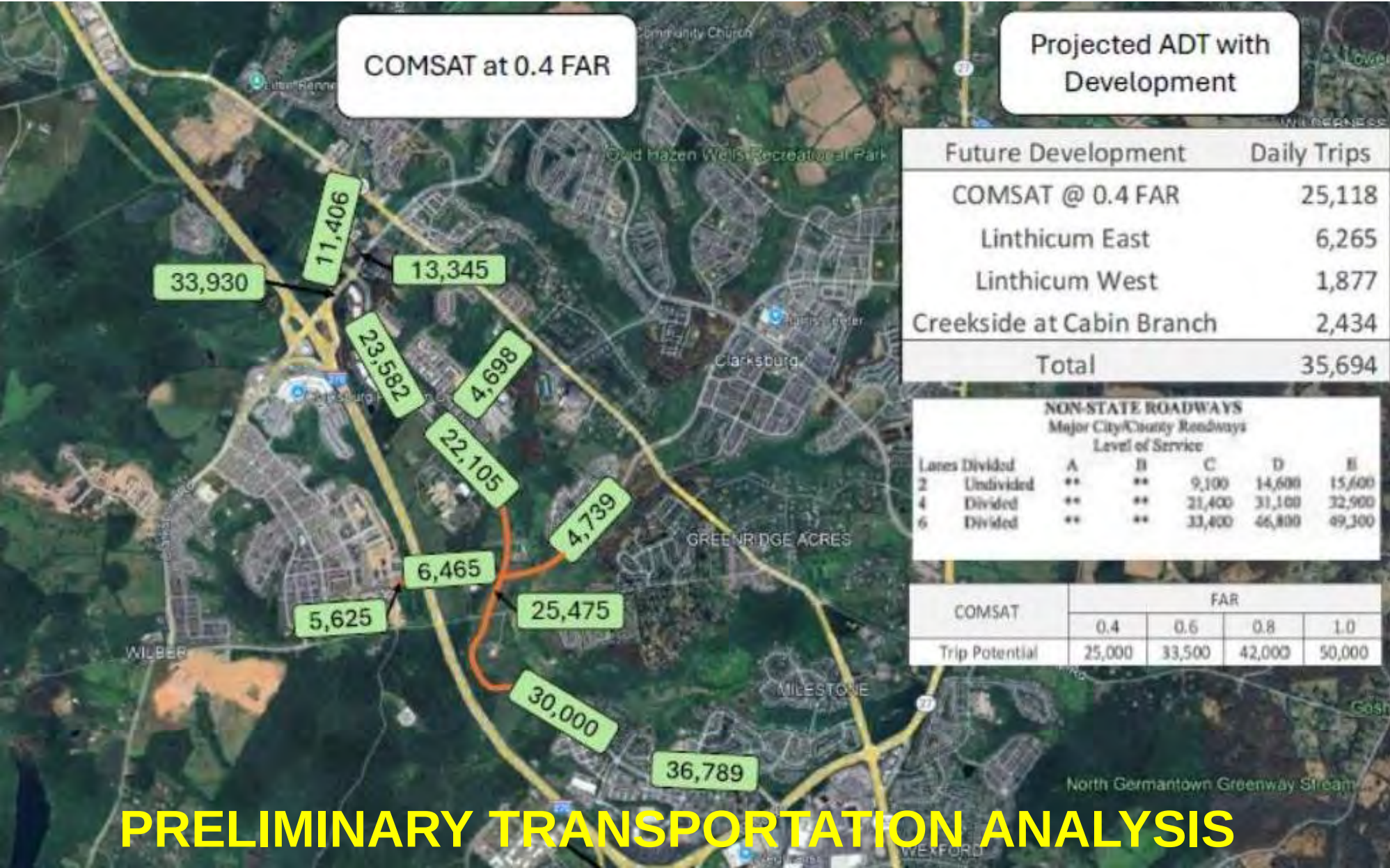


SCAN

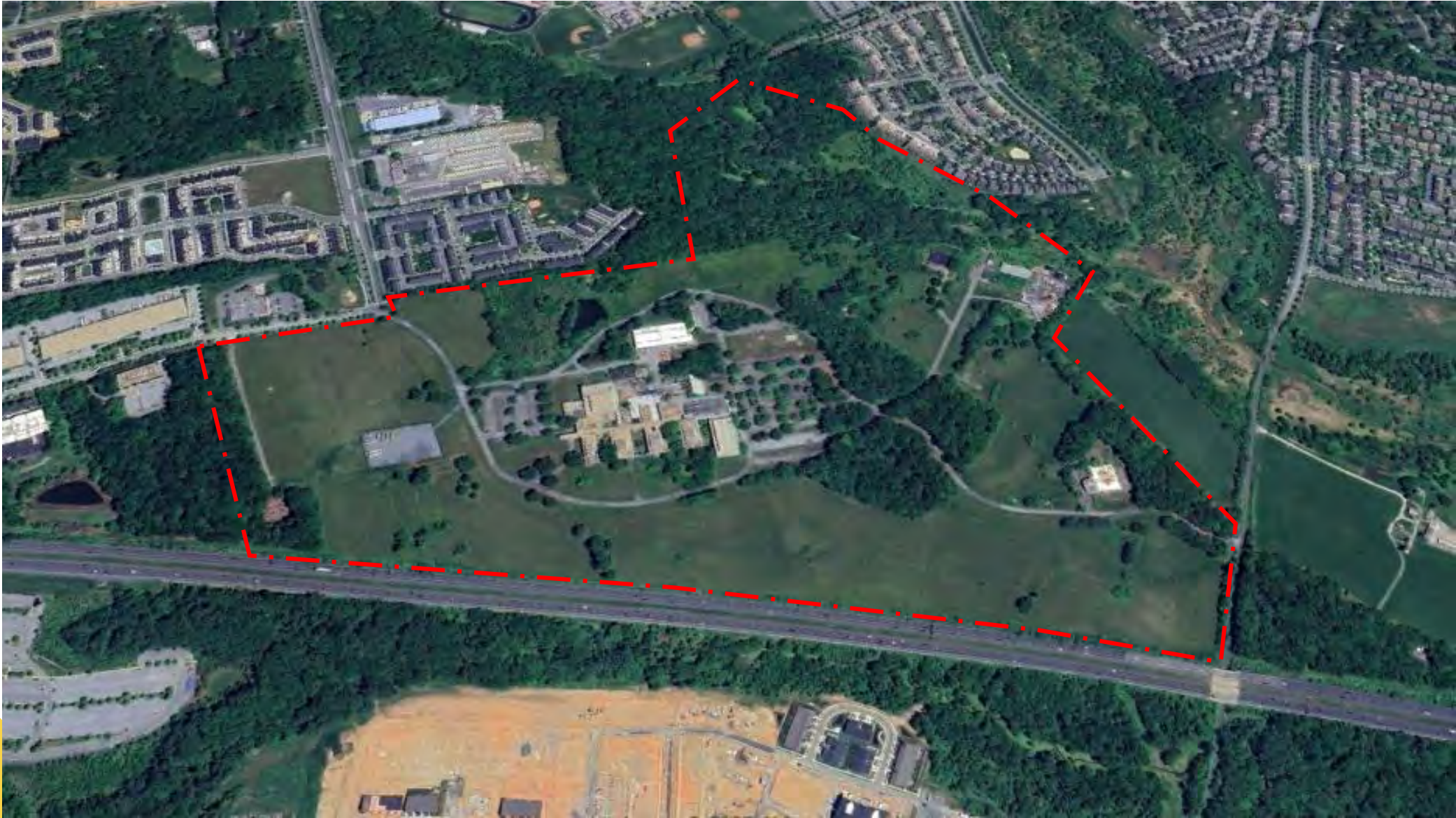


HONOR

ACCESS = ECONOMIC VIABILITY

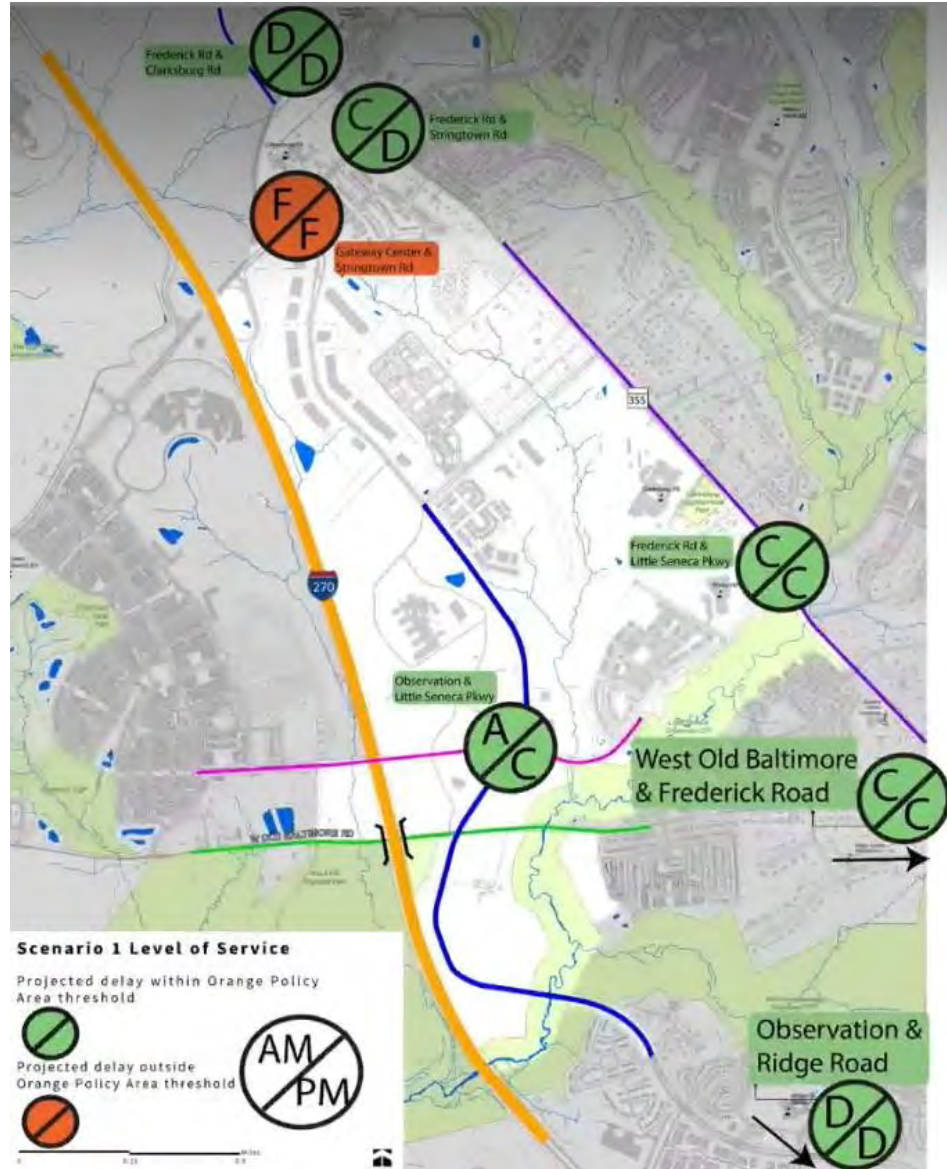


SITE SELECTION – ACCESS AND VISIBILITY

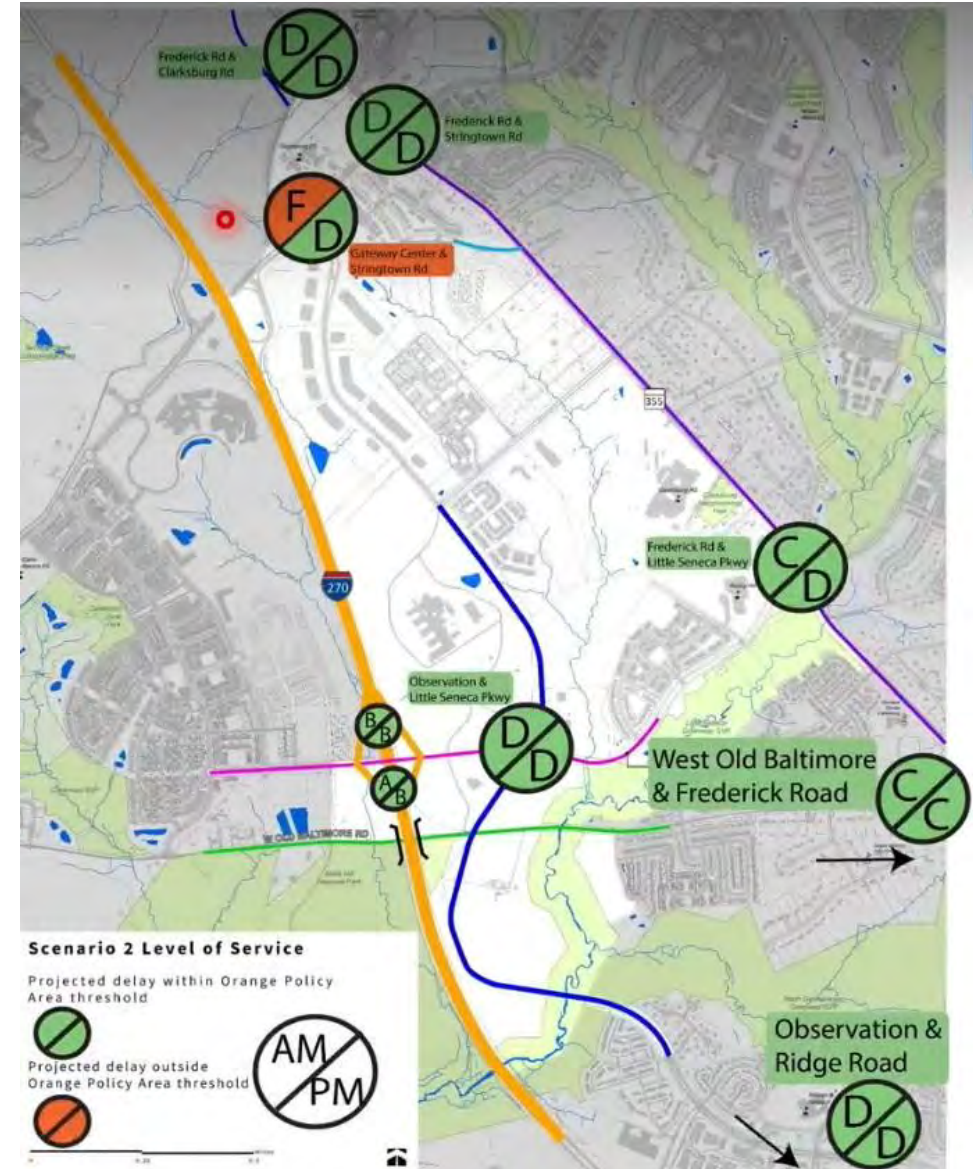


COUNTY ANALYSIS – JUNE 5, 2025

WITHOUT INTERCHANGE



WITH INTERCHANGE



WHAT'S MISSING?

Interchange Analysis: Other Considerations



Environment

- Sensitive natural areas west of I-270 will be significantly impacted by any ramp design.

Community Character

- Master plan can influence but not control design by Maryland State Highway Administration.
- Highway-oriented development may be incompatible with compact, walkable built environment that blends with the existing Clarksburg community.

Financial Costs

- Could money be better spent to benefit/relieve this community?
- Does a major investment in automobile infrastructure further the Thrive 2050 goal of reducing auto dependency?

Uncertain Delivery

- Will the interchange be a competitive project to receive state and federal funds given the relatively low predicted transportation impact?

SIMPLE ECONOMICS

Time Savings Calculation:

- County reports only 3 minutes saved per trip with interchange: 6 minutes/day/person
- @ 255 workdays / year = 25.5 hrs/person
- 7,500 residential vehicle/day between I-270 & Observation Drive Corridor New Housing: 191,250 total hours of time savings just for new residents

Equivalent Workforce Savings:

- 191,250 hours = 93.3 years of savings
- If each area resident earns average of \$100,000/year = \$9.3 million in total value

What if 10 minutes of savings?

- \$31.1 million of savings and quality of life
- No interchange results in over 45 minutes of delay for the evening commute home

Conclusion:

- A small daily time saving across a large population produces massive economic value and improved quality of life of \$9.3-\$31.1 million annually
- This analysis only includes NEW commuter residents of the Sector Plan. Existing residents and other retail uses would result in additional savings.

- **We believe the “ramps” are significantly less than \$31 million making the human capital “payback” less than 1 year.**

SECTOR PLAN AREA



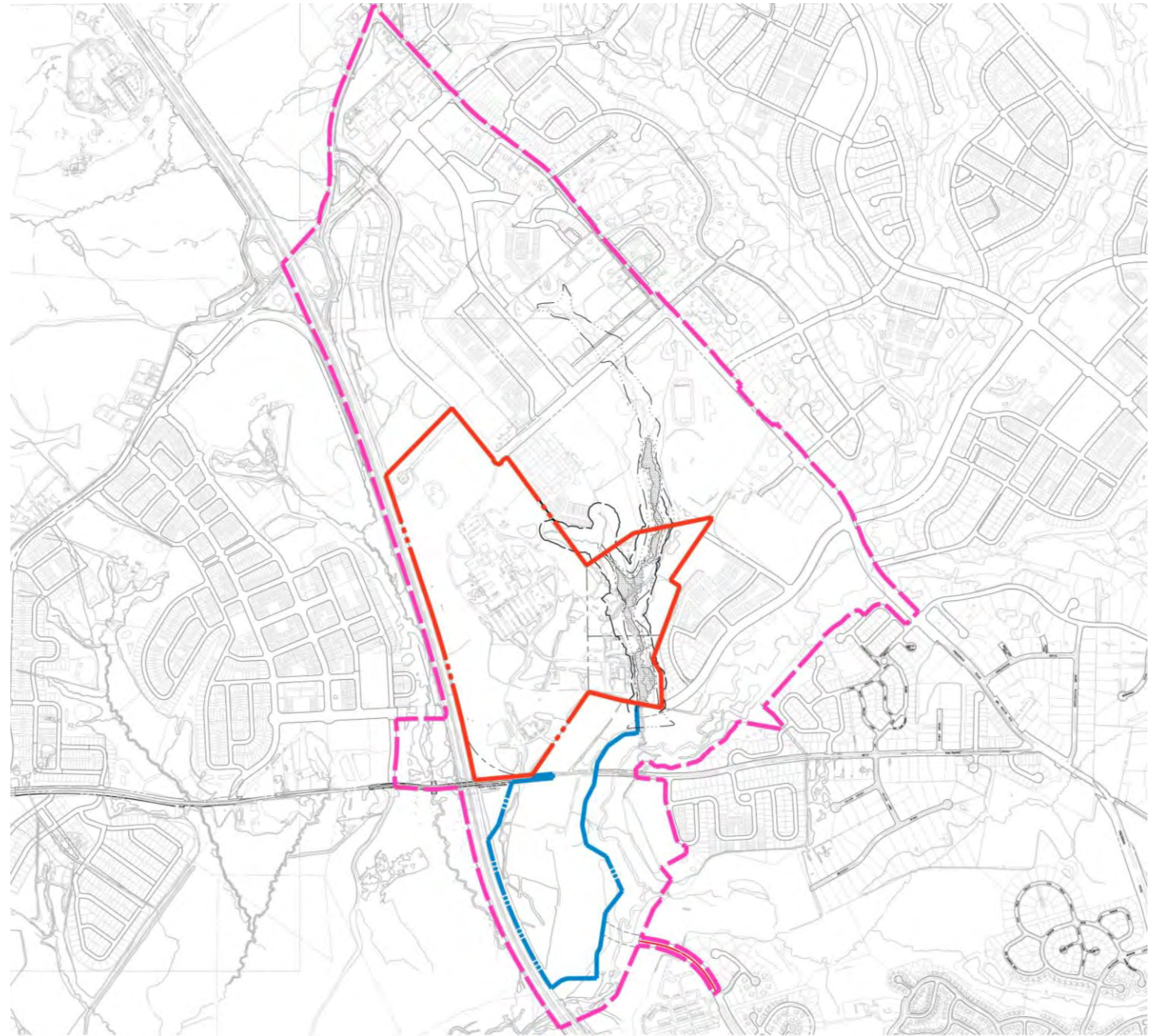
**CLARKSBURG GATEWAY
SECTOR BOUNDARY**
± 969 AC TOTAL



COMSAT PROPERTY
± 203.8 AC TOTAL
(21.03% OF SECTOR PLAN)



LINTHICUM EAST PROPERTY
± 79.1 AC TOTAL
(8.16% OF SECTOR PLAN)

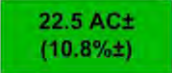


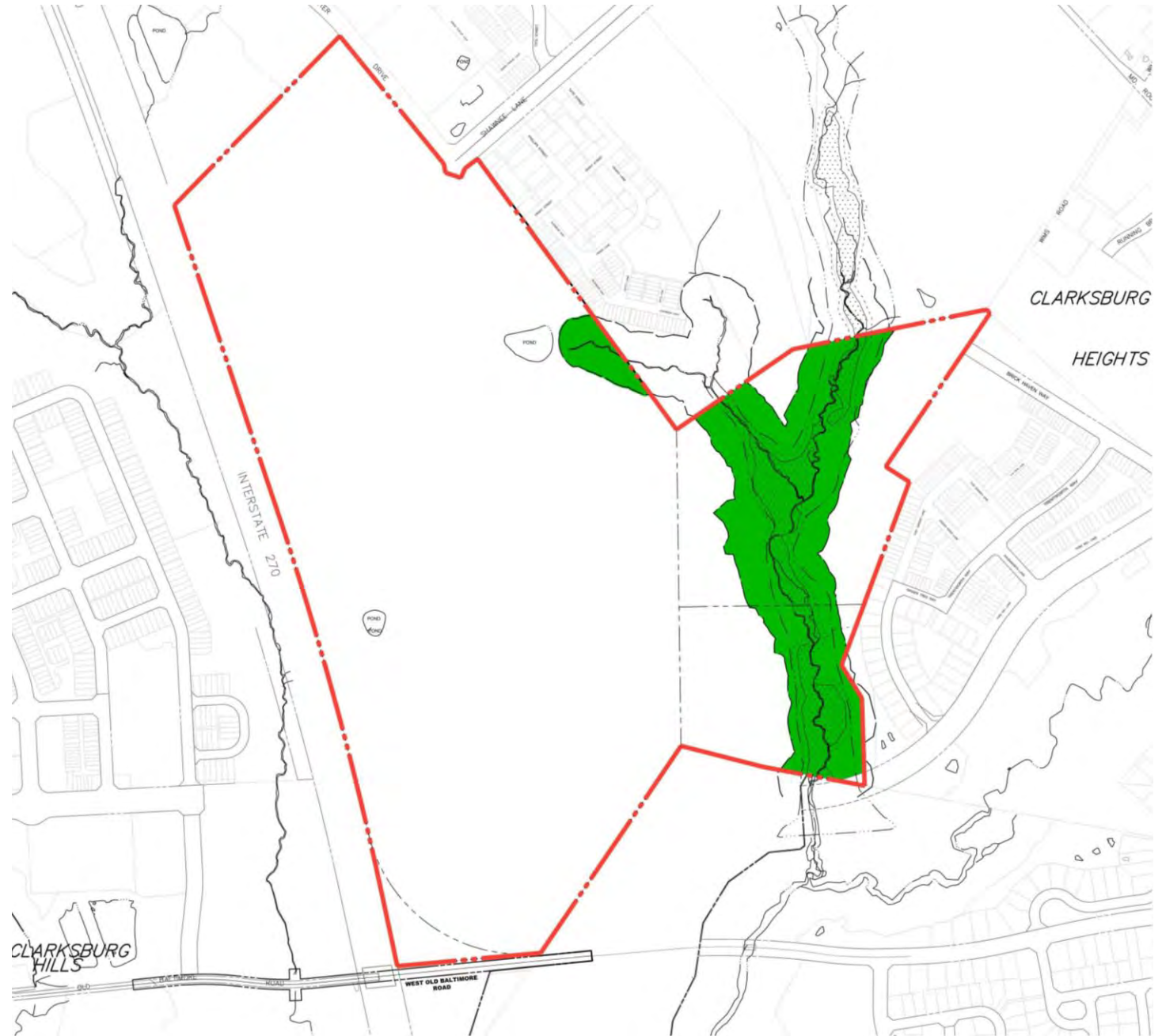
DEATH BY REGULATORY ACCUMULATION



STREAM VALLEY BUFFER

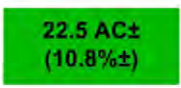
 COMSAT PROPERTY
203.8 AC± TOTAL

 22.5 AC±
(10.8%±) STREAM VALLEY BUFFER

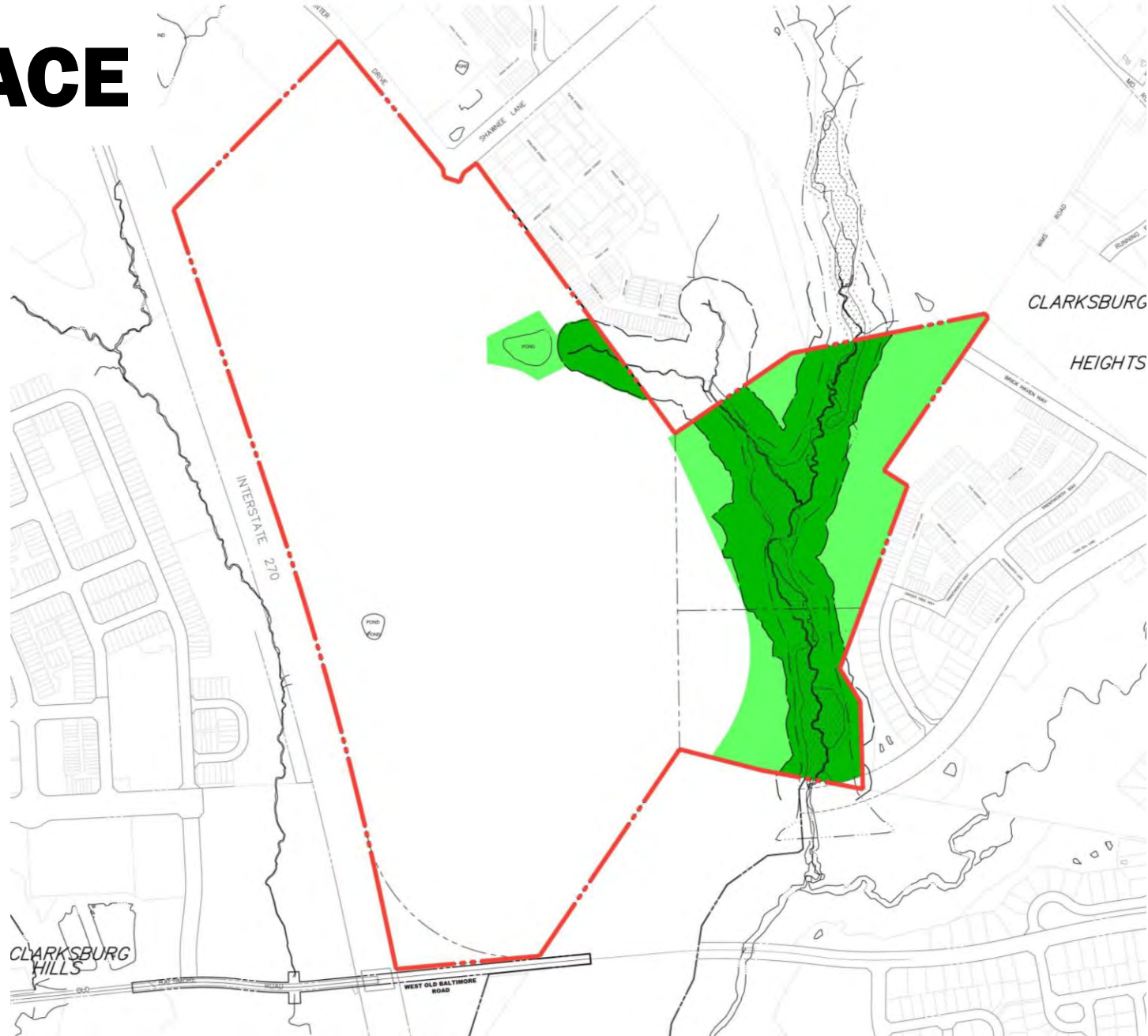


STREAM VALLEY ADJACENT OPEN SPACE

 COMSAT PROPERTY
203.8 AC± TOTAL

 22.5 AC±
(10.8%±) STREAM VALLEY BUFFER

 18.8 AC±
(9.0%±) STREAM VALLEY ADJACENT
OPEN SPACE



MASTER PLAN ROADS (ORIGINAL)



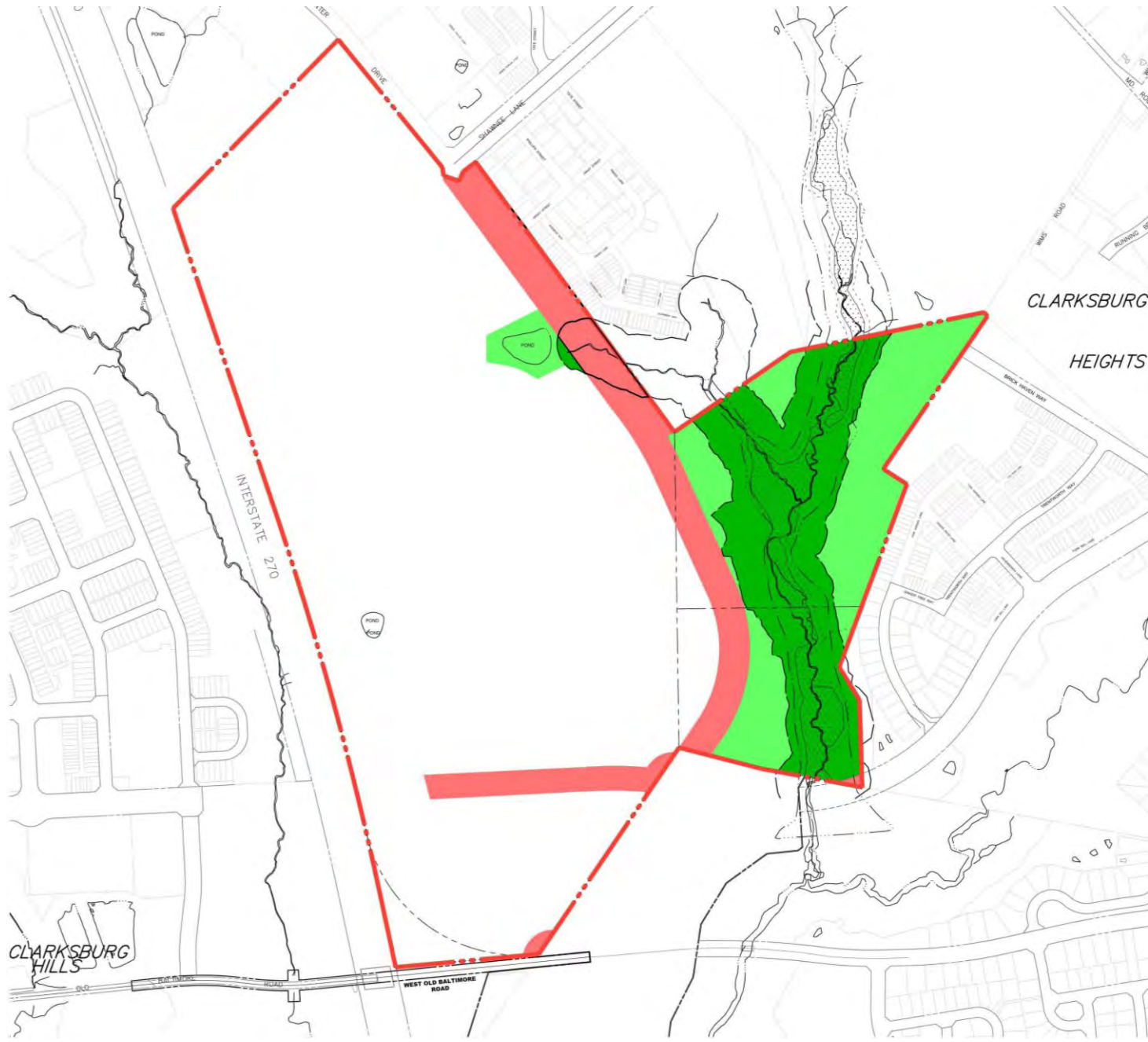
MASTER PLAN ROADS (PROPOSED)

COMSAT PROPERTY
± 203.8 AC TOTAL

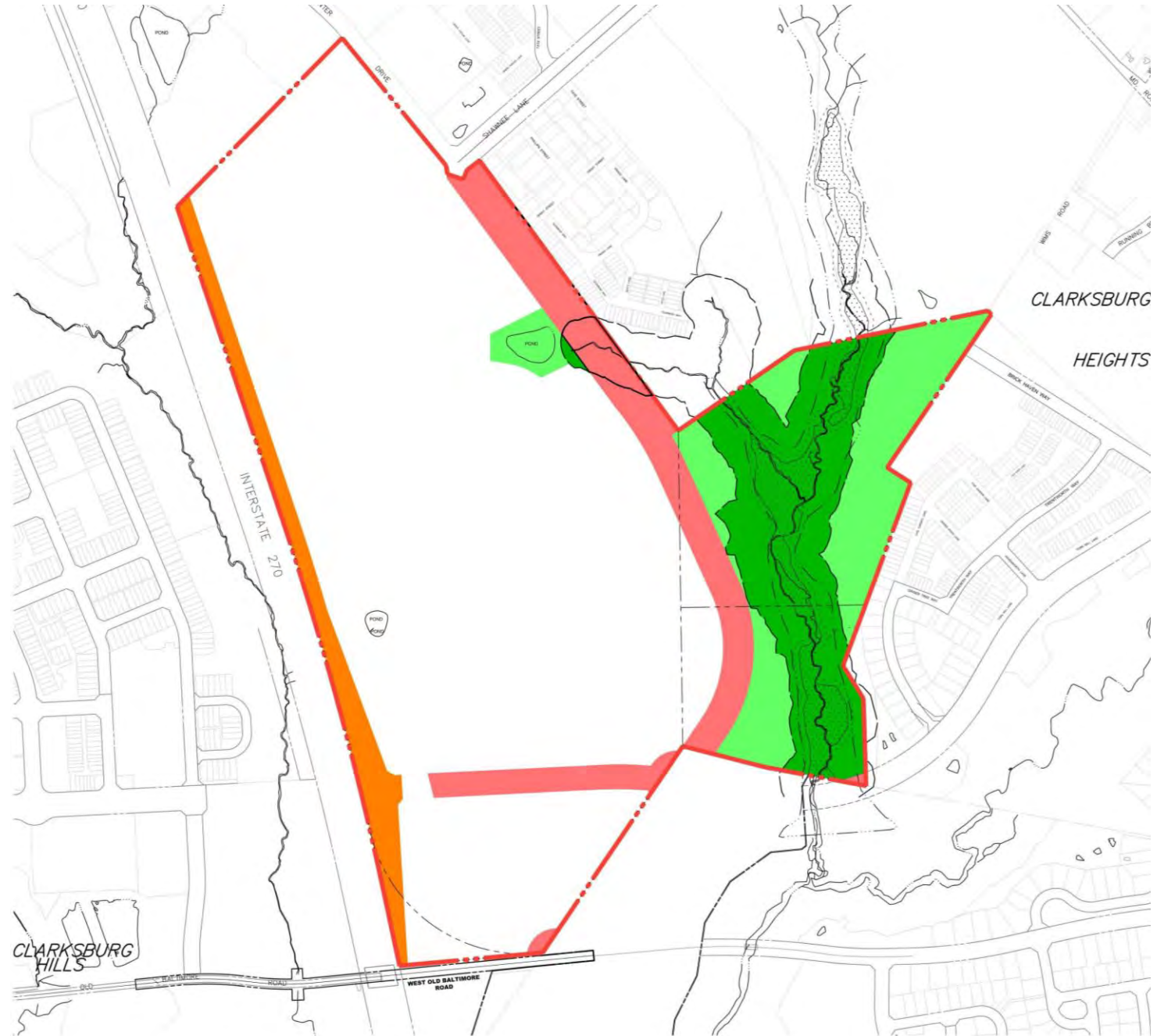
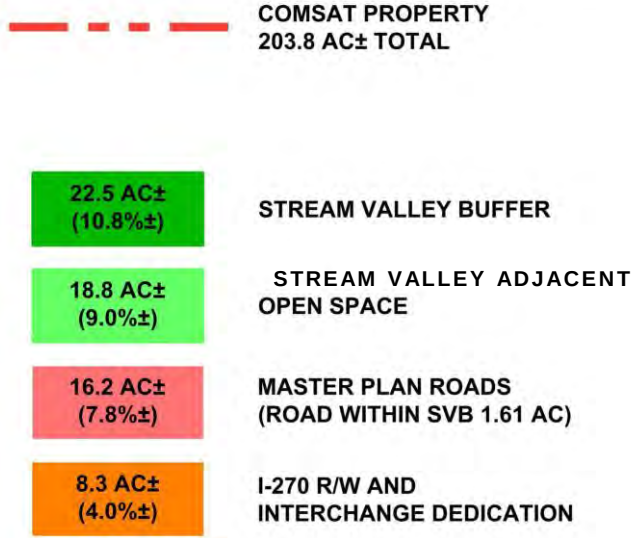
22.5 AC±
(10.8%±)
STREAM VALLEY BUFFER

18.8 AC±
(9.0%±)
STREAM VALLEY ADJACENT
OPEN SPACE

16.2 AC±
(7.8%±)
MASTER PLAN ROADS
(ROAD WITHIN SVB 3.11 AC)



I-270 ROW / SETBACK



200' BUFFER



COMSAT PROPERTY
203.8 AC± TOTAL

22.5 AC±
(10.8%±)

STREAM VALLEY BUFFER

18.8 AC±
(9.0%±)

STREAM VALLEY ADJACENT
OPEN SPACE

16.2 AC±
(7.8%±)

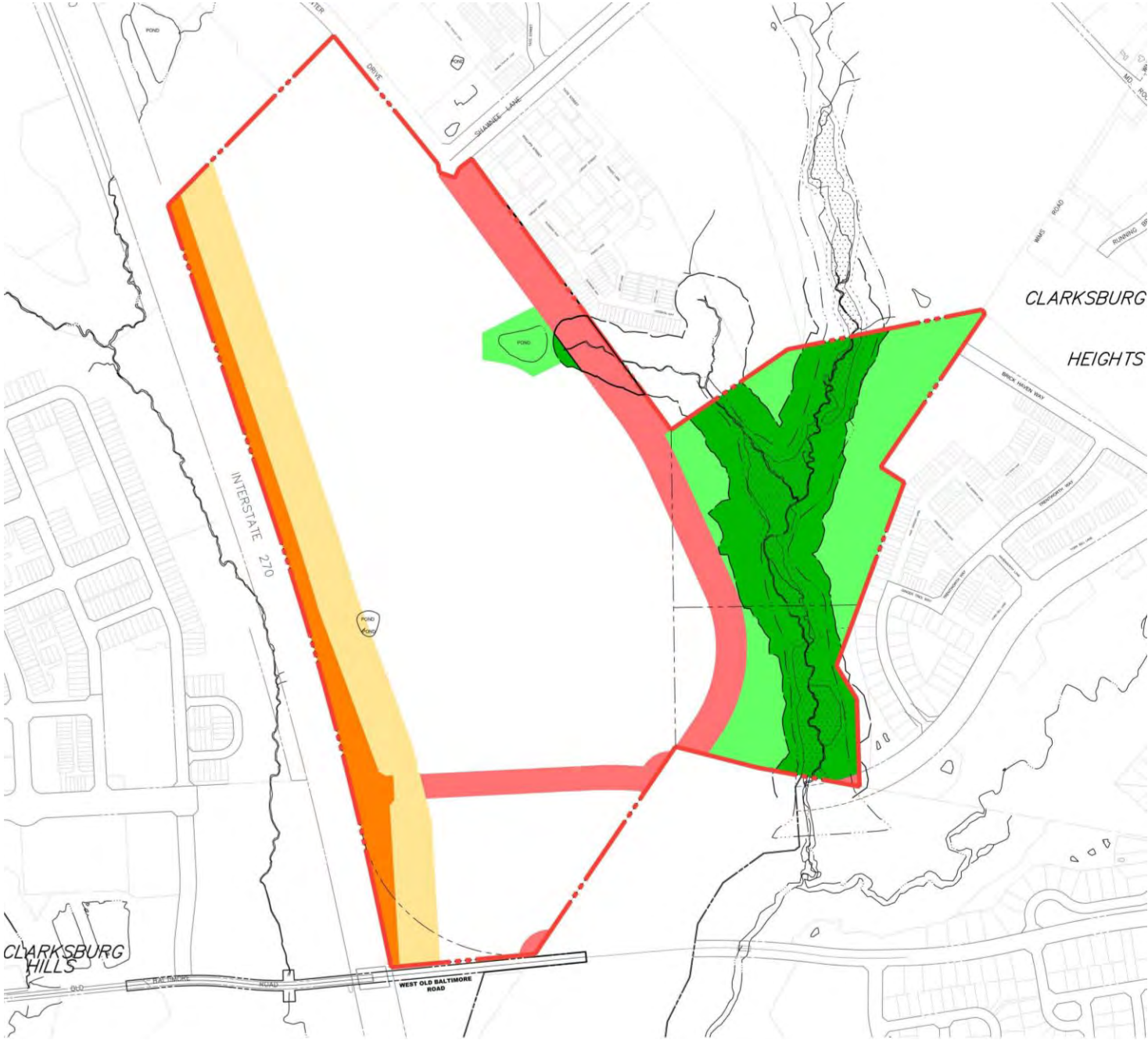
MASTER PLAN ROADS
(ROAD WITHIN SVB 1.61 AC)

8.3 AC±
(4.0%±)

I-270 R/W AND
INTERCHANGE DEDICATION

18.3 AC±
(8.8%±)

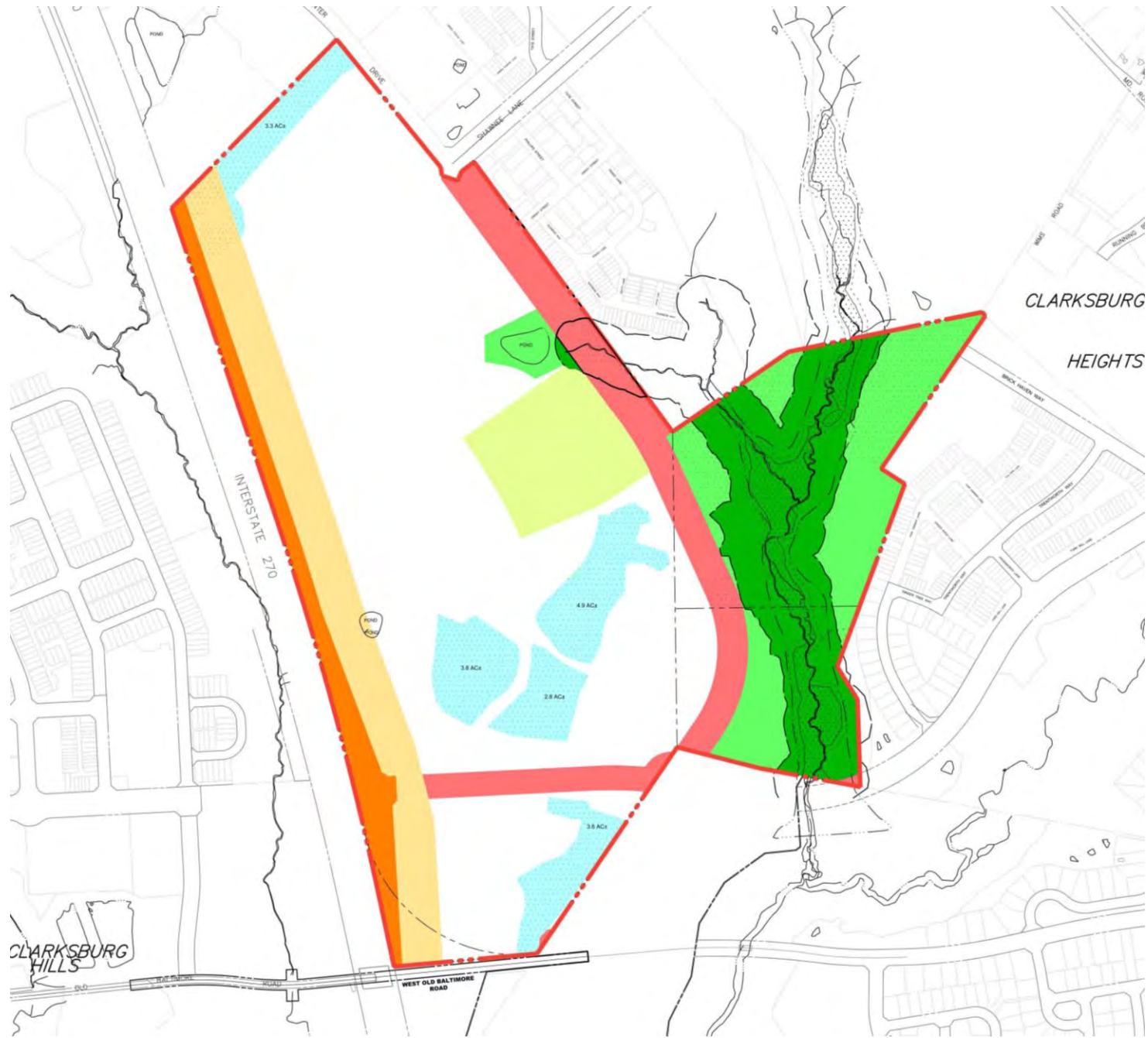
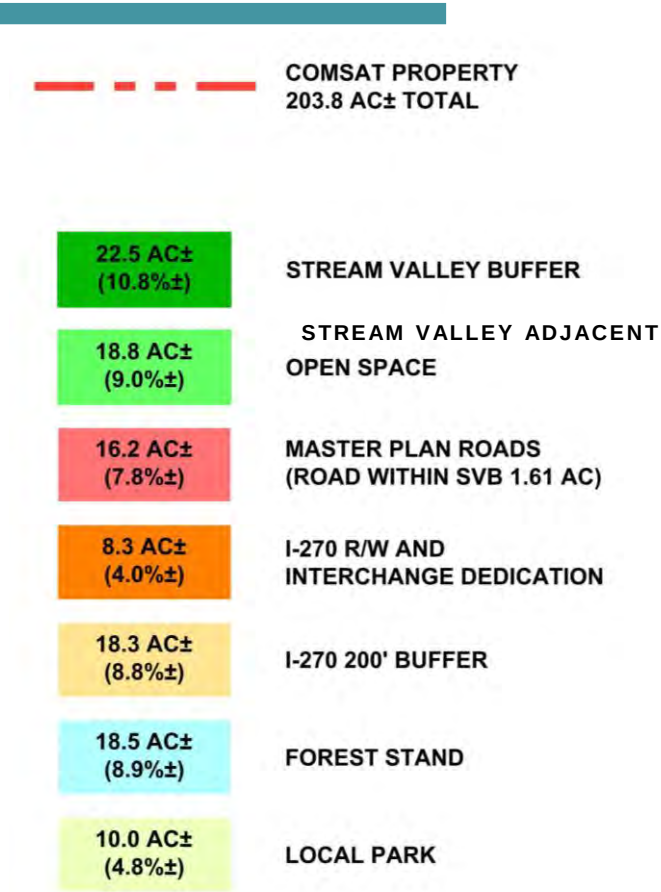
I-270 200' BUFFER



EXISTING FOREST STAND



LOCAL PARK



DEVELOPMENT ROW

----- COMSAT PROPERTY
203.8 AC± TOTAL

22.5 AC±
(10.8%±)

STREAM VALLEY BUFFER

18.8 AC±
(9.0%±)

STREAM VALLEY ADJACENT
OPEN SPACE

16.2 AC±
(7.8%±)

MASTER PLAN ROADS
(ROAD WITHIN SVB 1.61 AC)

8.3 AC±
(4.0%±)

I-270 R/W AND
INTERCHANGE DEDICATION

18.3 AC±
(8.8%±)

I-270 200' BUFFER

18.5 AC±
(8.9%±)

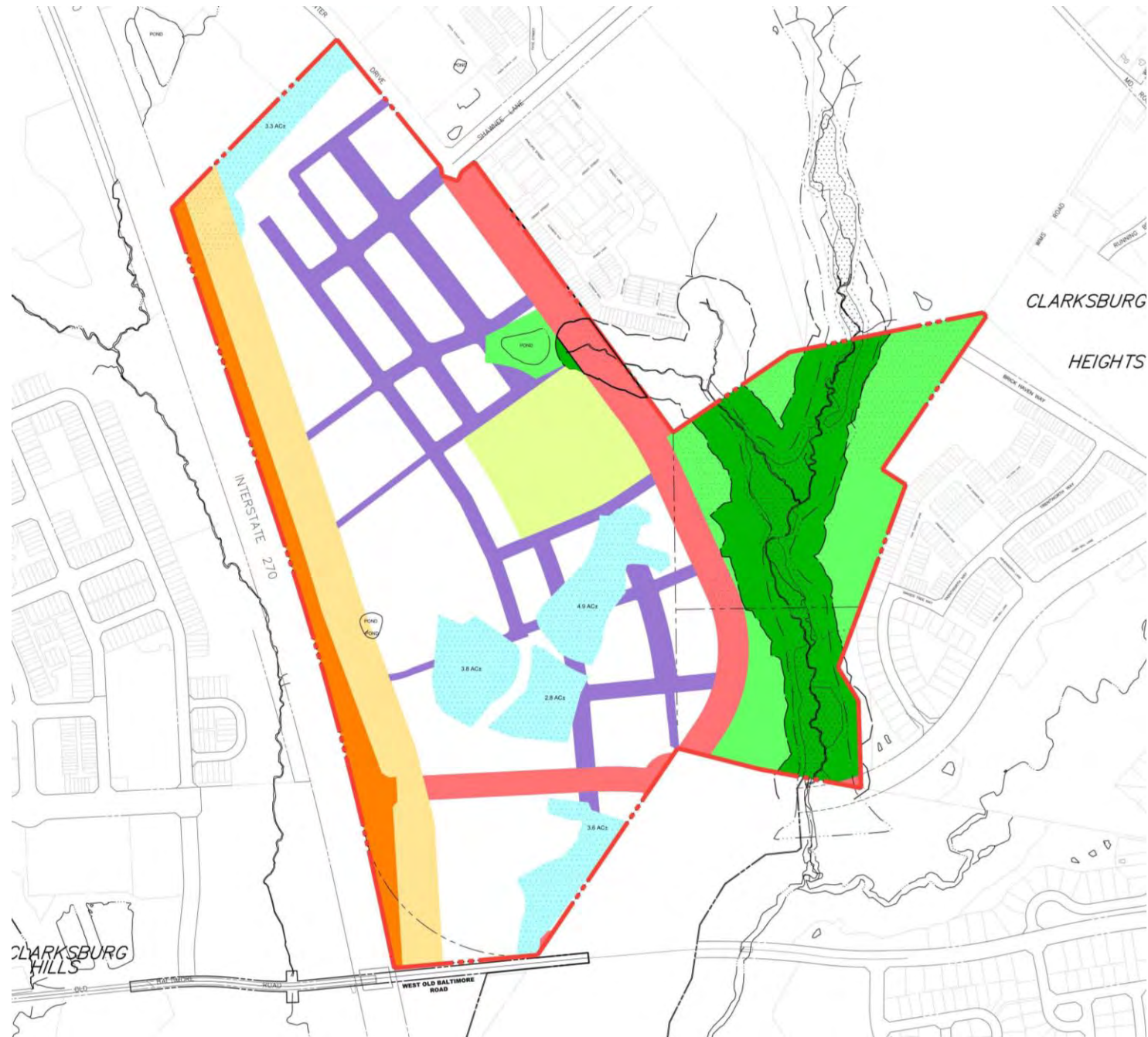
FOREST STAND

10.0 AC±
(4.8%±)

LOCAL PARK

19.9 AC±
(9.8%±)

DEVELOPMENT ROW



35% GREEN COVER



 COMSAT PROPERTY
203.8 AC± TOTAL

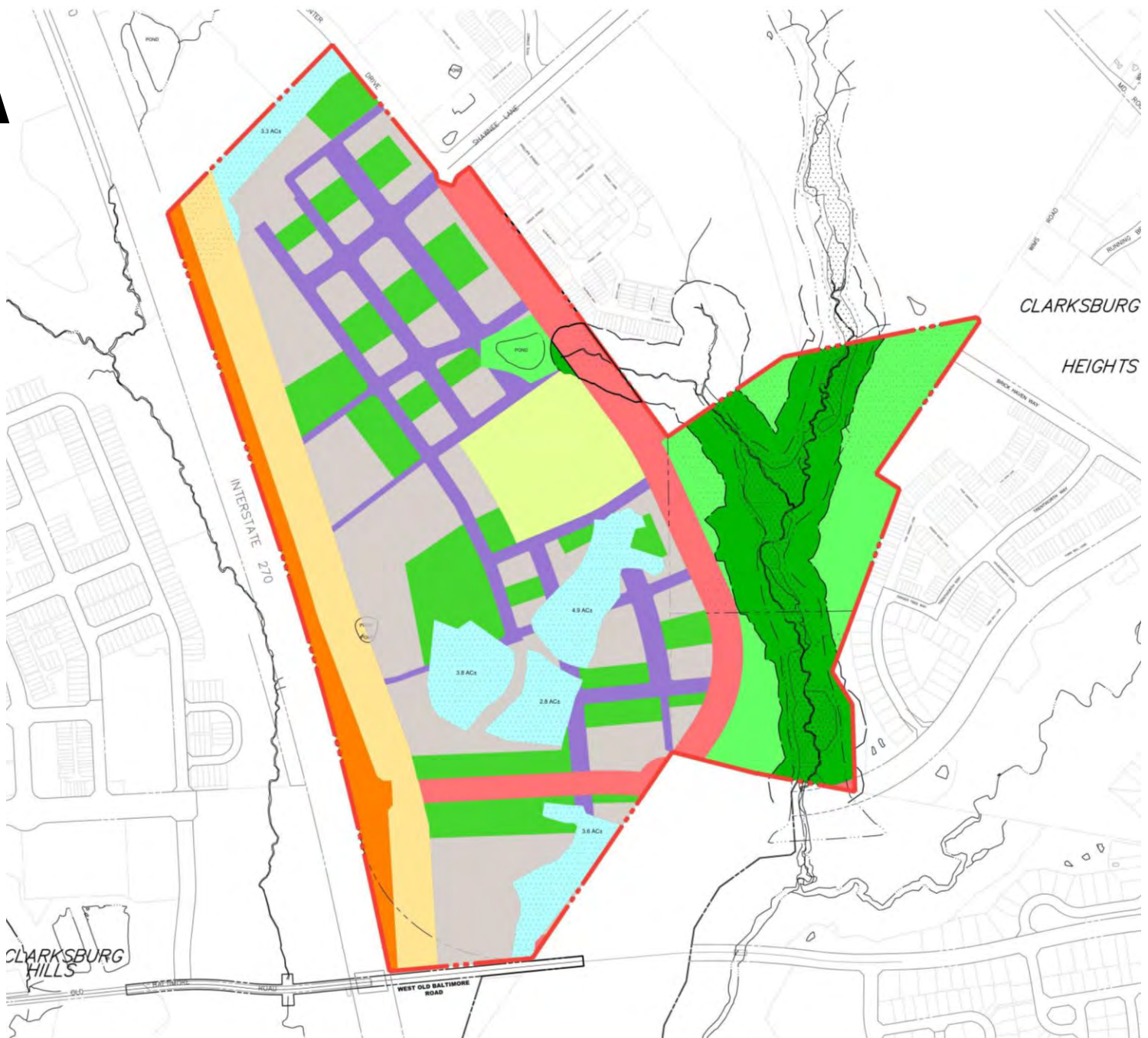
22.5 AC± (10.8%±)	STREAM VALLEY BUFFER
18.8 AC± (9.0%±)	STREAM VALLEY ADJACENT OPEN SPACE
16.2 AC± (7.8%±)	MASTER PLAN ROADS (ROAD WITHIN SVB 1.61 AC)
8.3 AC± (4.0%±)	I-270 R/W AND INTERCHANGE DEDICATION
18.3 AC± (8.8%±)	I-270 200' BUFFER
18.5 AC± (8.9%±)	FOREST STAND
10.0 AC± (4.8%±)	LOCAL PARK
19.9 AC± (9.8%±)	DEVELOPMENT ROW
26.7 AC± (13.1%±)	35% GREEN COVER (68.5 AC x 0.35)



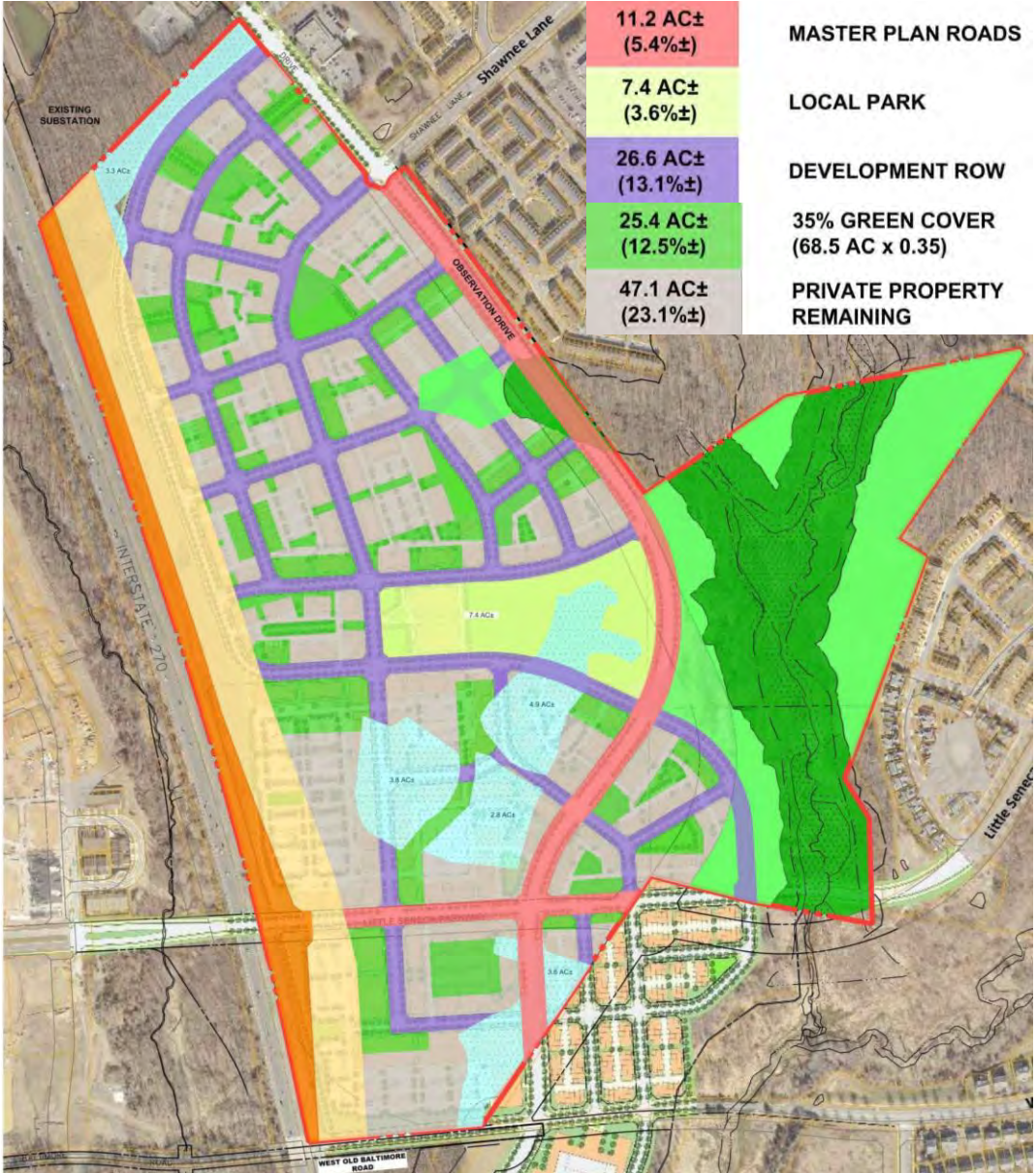
REMAINING DEVELOPMENT AREA

COMSAT PROPERTY
203.8 AC± TOTAL

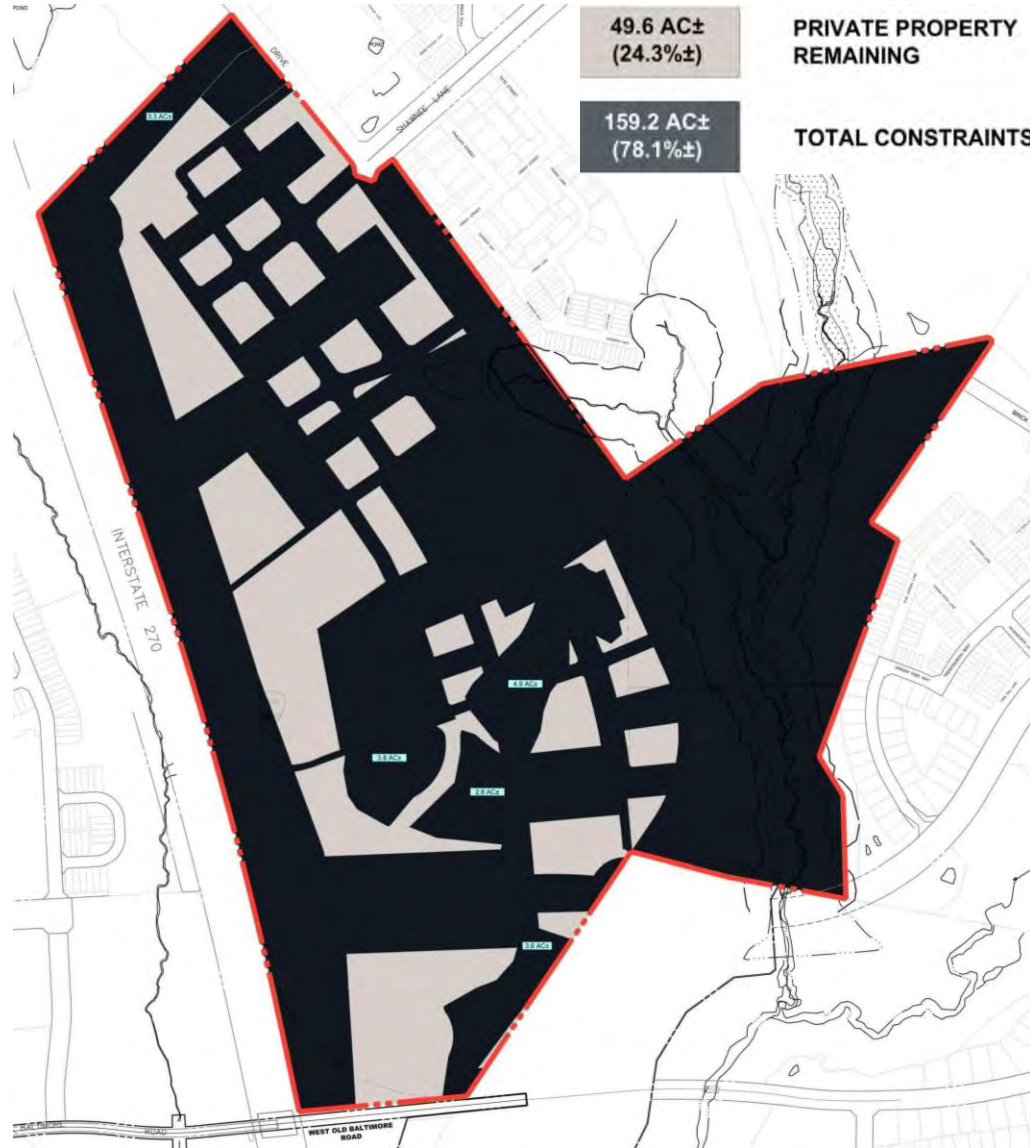
- 22.5 AC± (10.8%±) STREAM VALLEY BUFFER
- 18.8 AC± (9.0%±) STREAM VALLEY ADJACENT OPEN SPACE
- 16.2 AC± (7.8%±) MASTER PLAN ROADS (ROAD WITHIN SVB 1.61 AC)
- 8.3 AC± (4.0%±) I-270 R/W AND INTERCHANGE DEDICATION
- 18.3 AC± (8.8%±) I-270 200' BUFFER
- 18.5 AC± (8.9%±) FOREST STAND
- 10.0 AC± (4.8%±) LOCAL PARK
- 19.9 AC± (9.8%±) DEVELOPMENT ROW
- 26.7 AC± (13.1%±) 35% GREEN COVER (68.5 AC x 0.35)
- 49.6 AC± (24.3%±) PRIVATE PROPERTY REMAINING



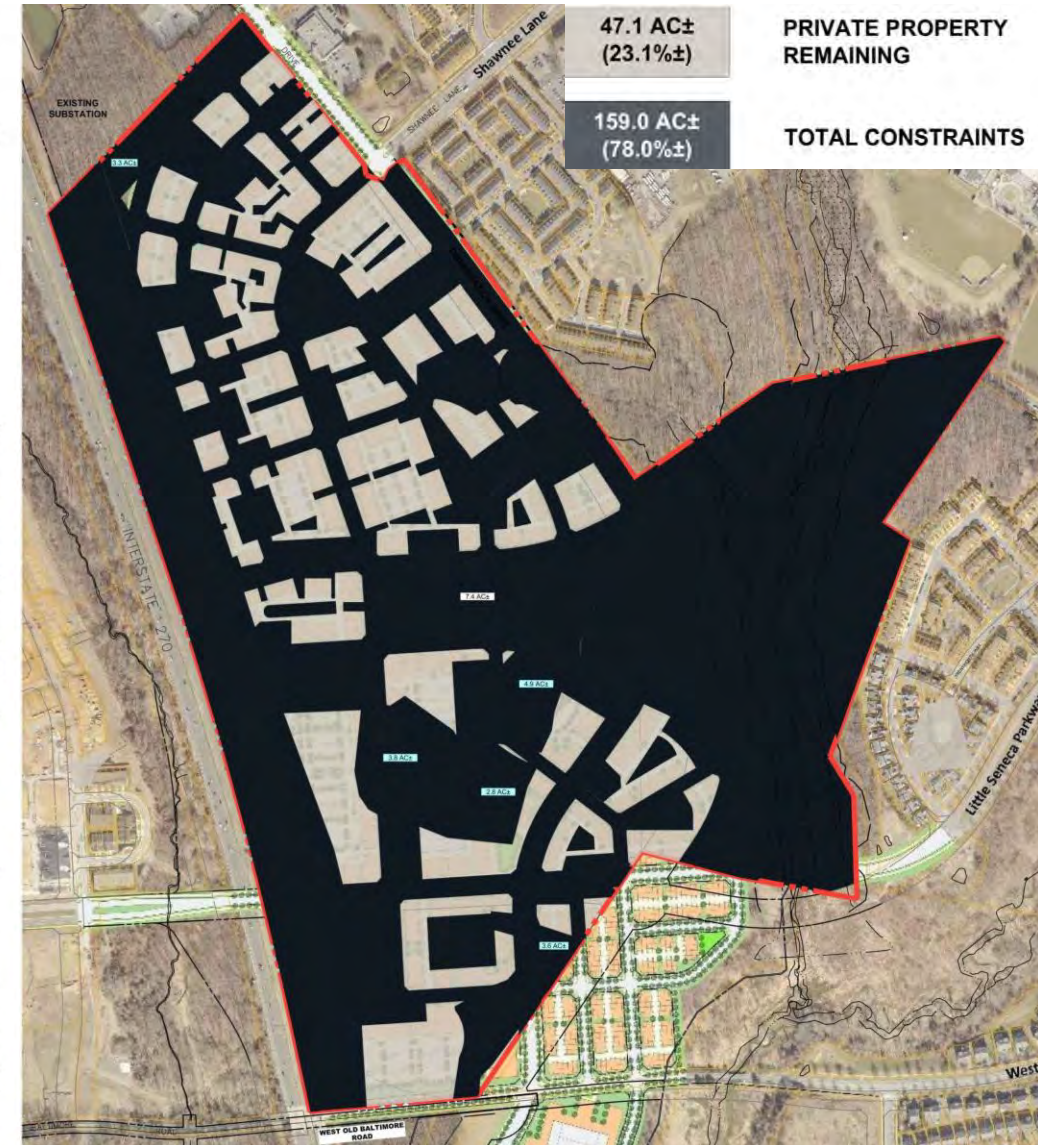
COUNTY'S DIAGRAM ANALYSIS



CONSTRAINTS RESTRICTIONS



OWNERSHIP



COUNTY

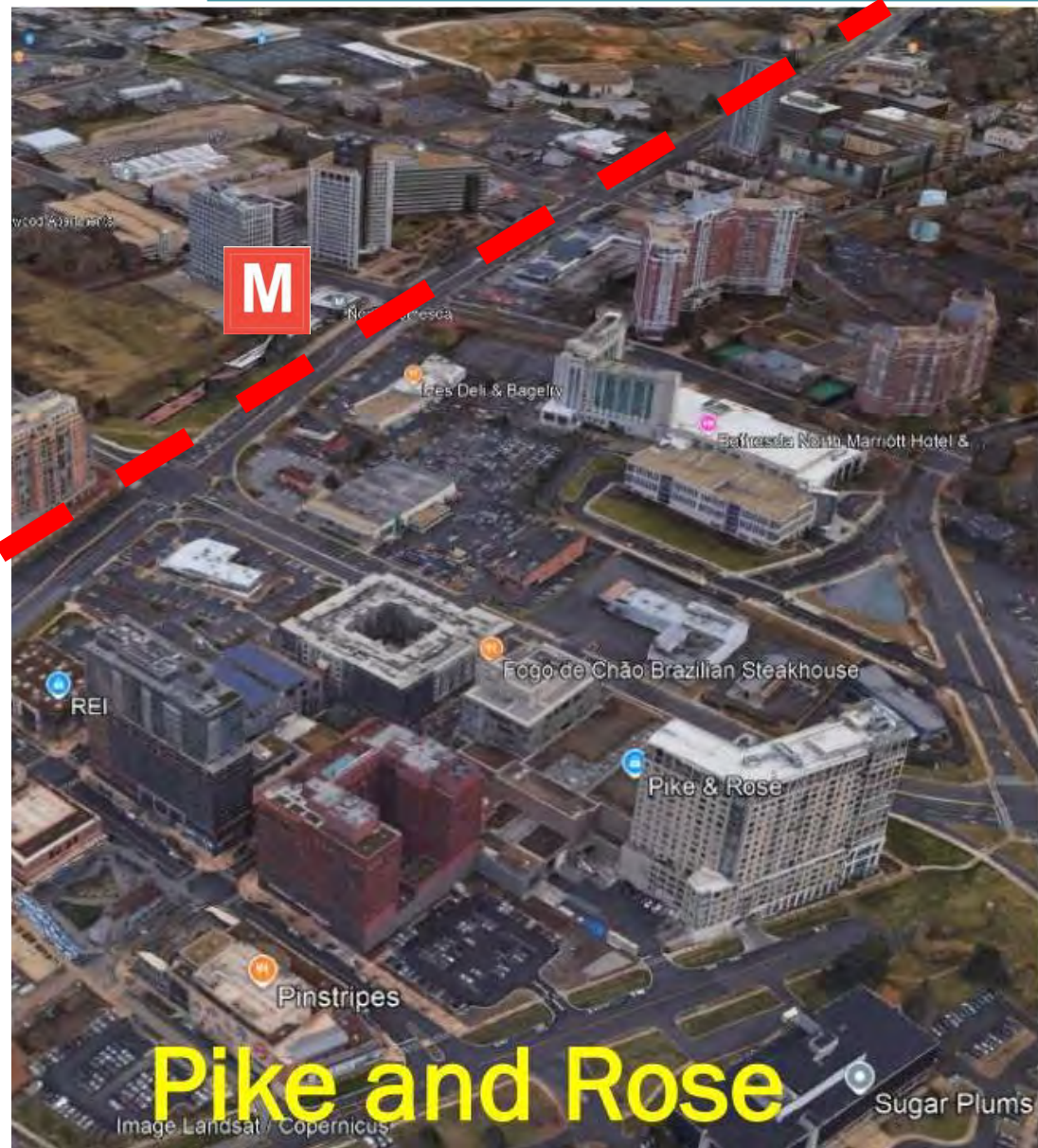
PARK POTOMAC: I-270 PROXIMITY (54' FROM I-270)



RIO – VISIBILITY & SUCCESS



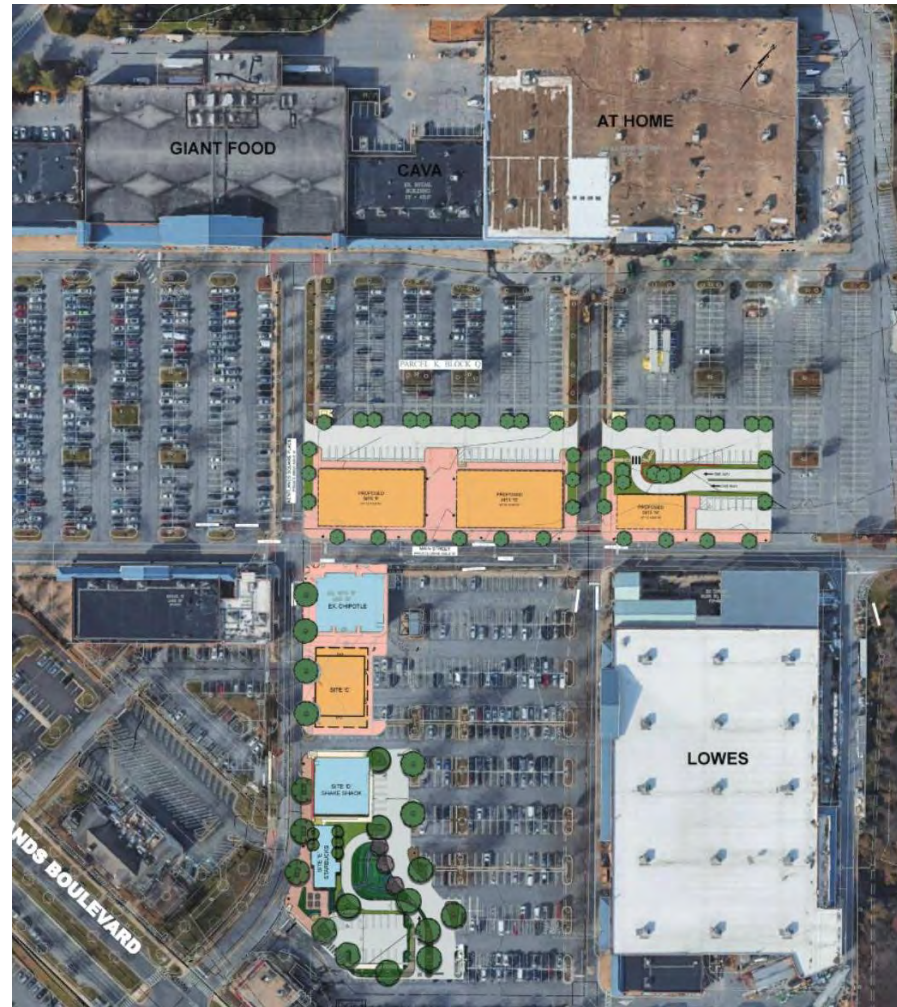
EQUITY IN MIXED USE



KENTLANDS: INCREMENTAL PHASING



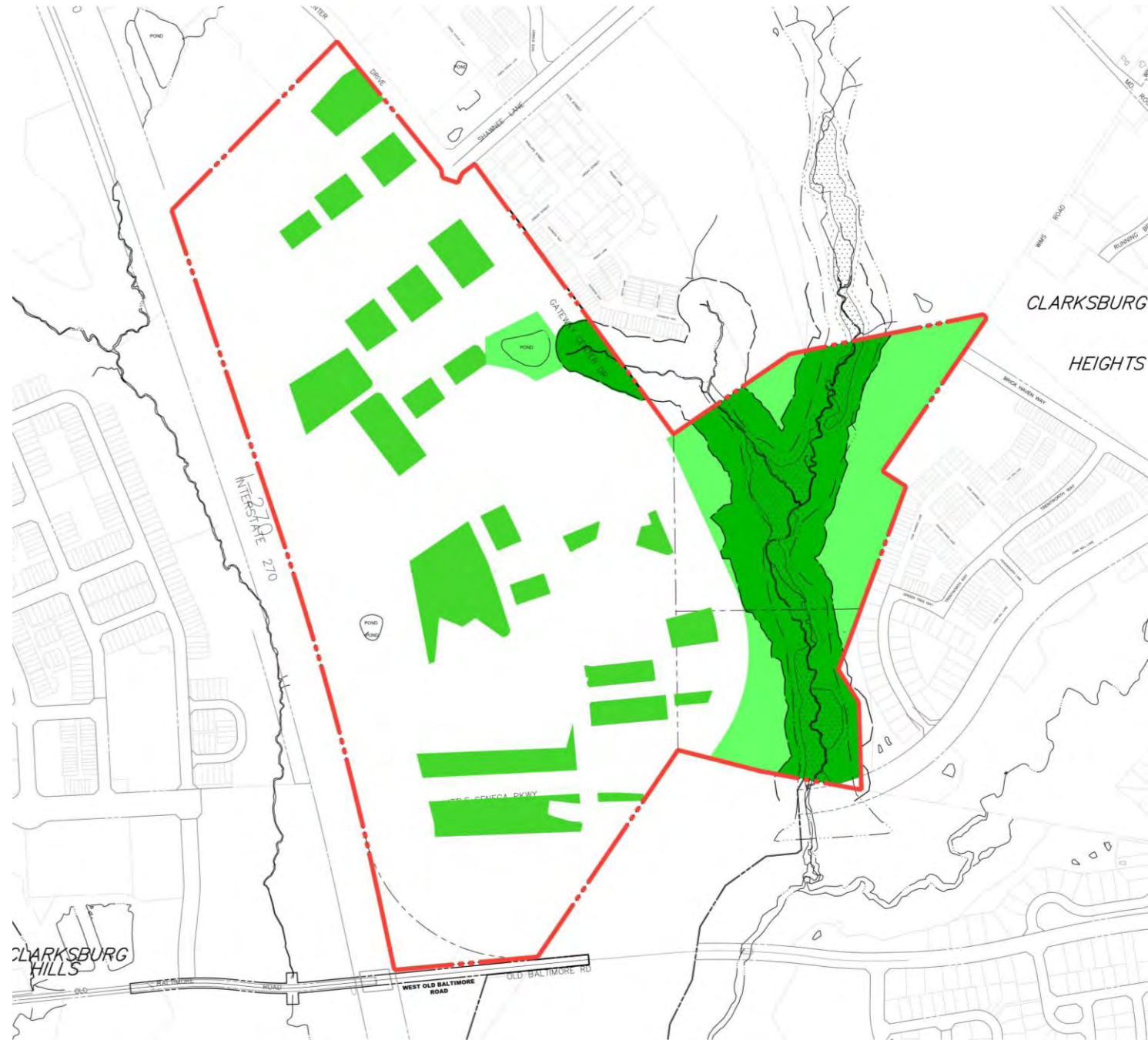
**1994 CONDITIONS
(ORIGINAL)**



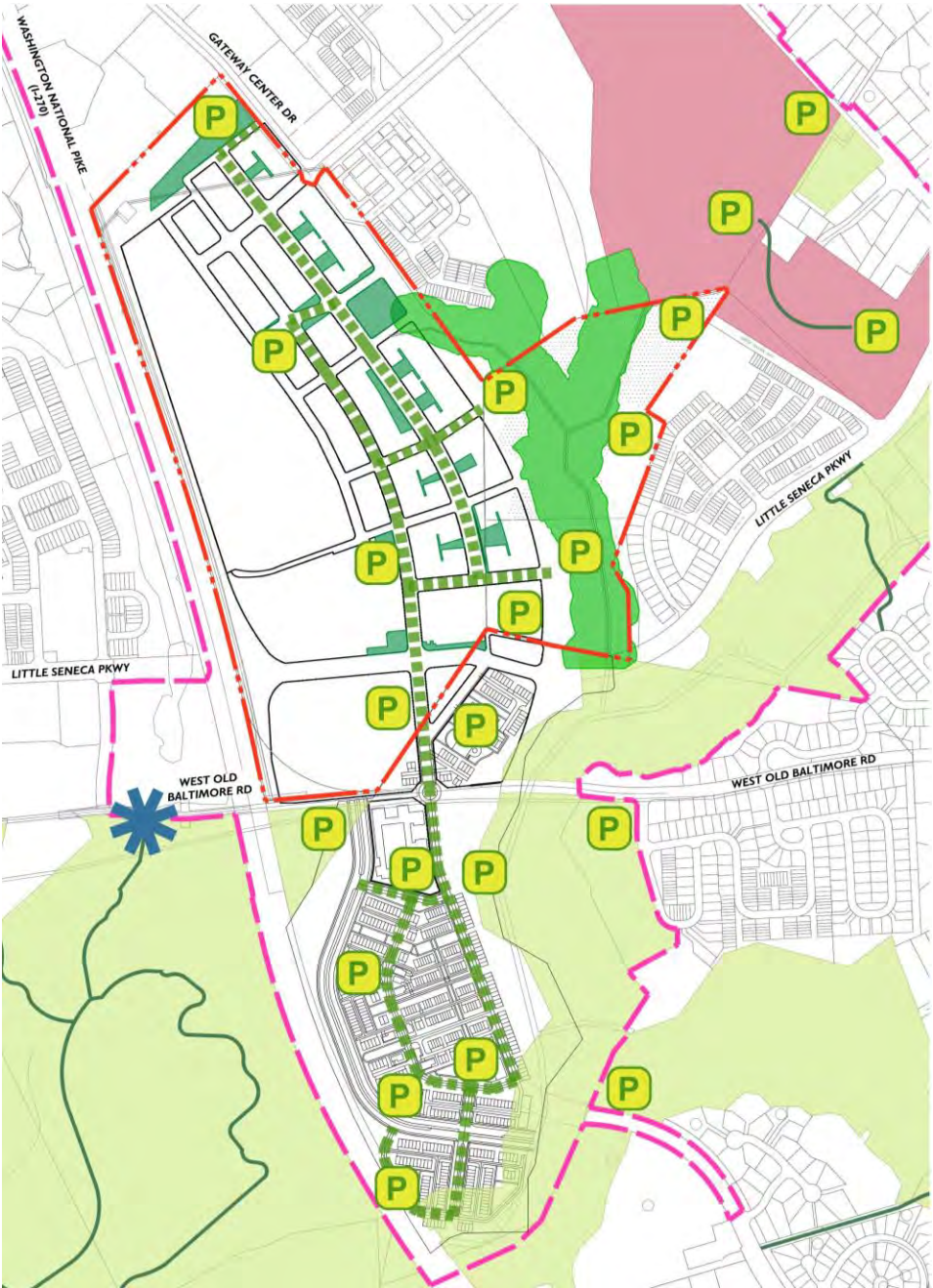
**INTERIM PHASES
(30+ YEARS)**



**LONG TERM
(10 - 15 YEARS AWAY)**

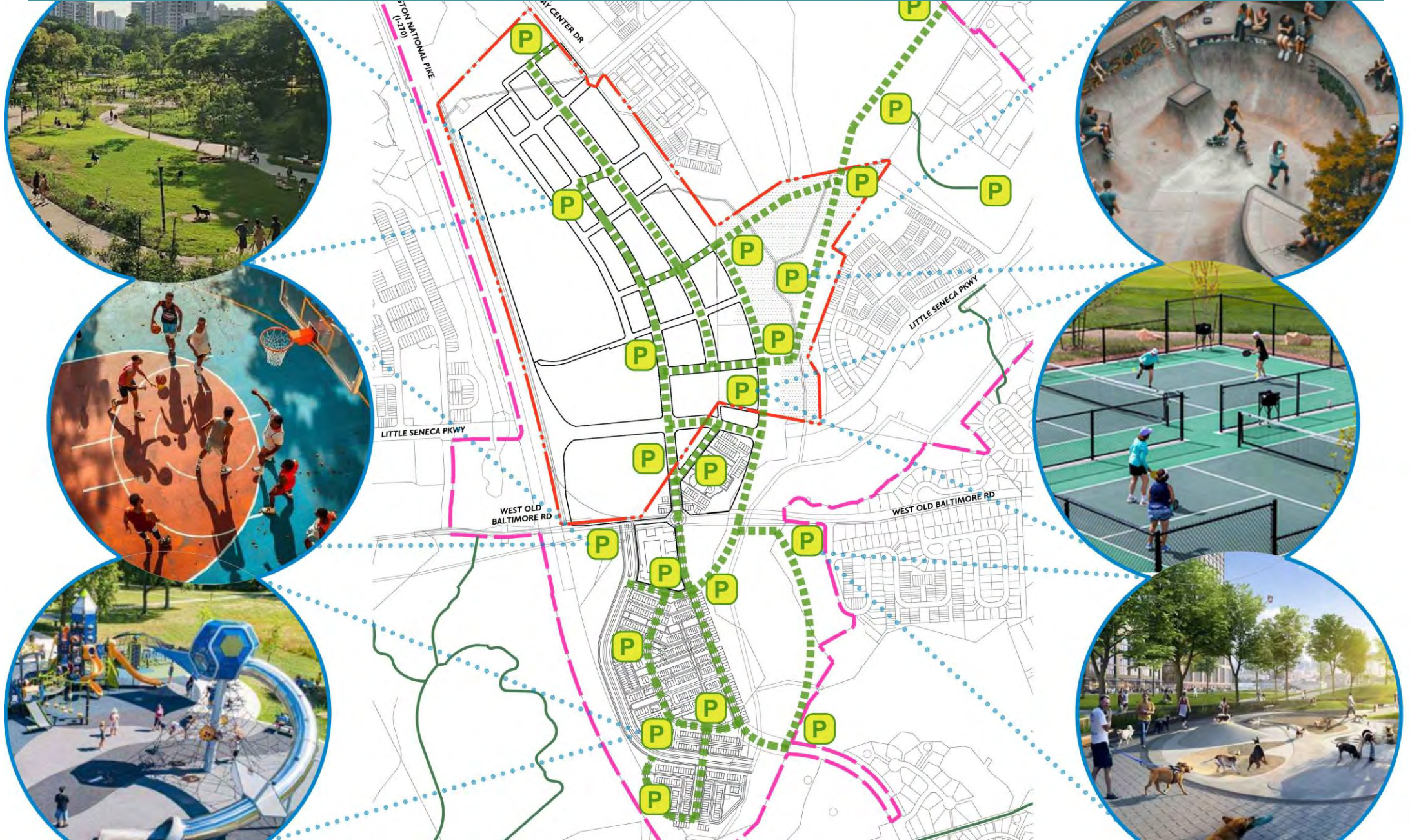


CONSTELLATION ALTERNATIVE



“A STRING OF PEARLS”

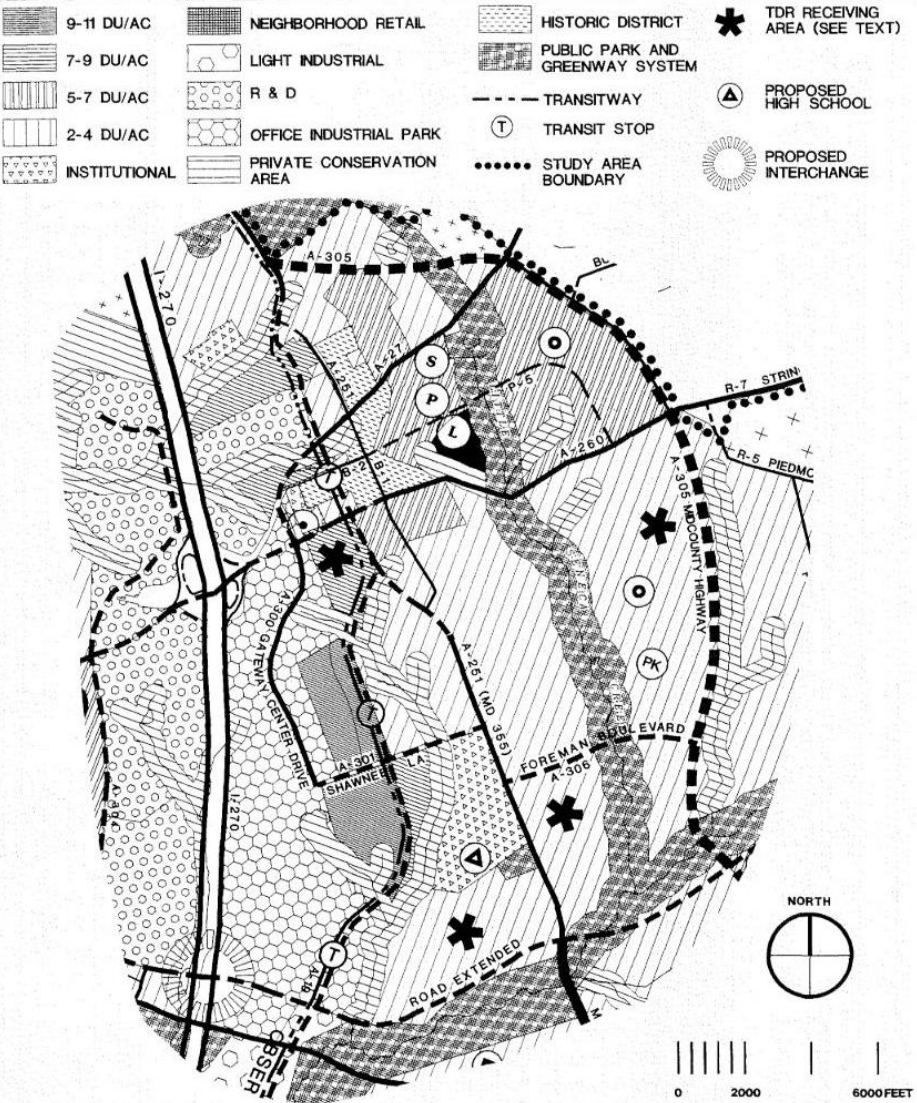
CONSTELLATION OF PARKS



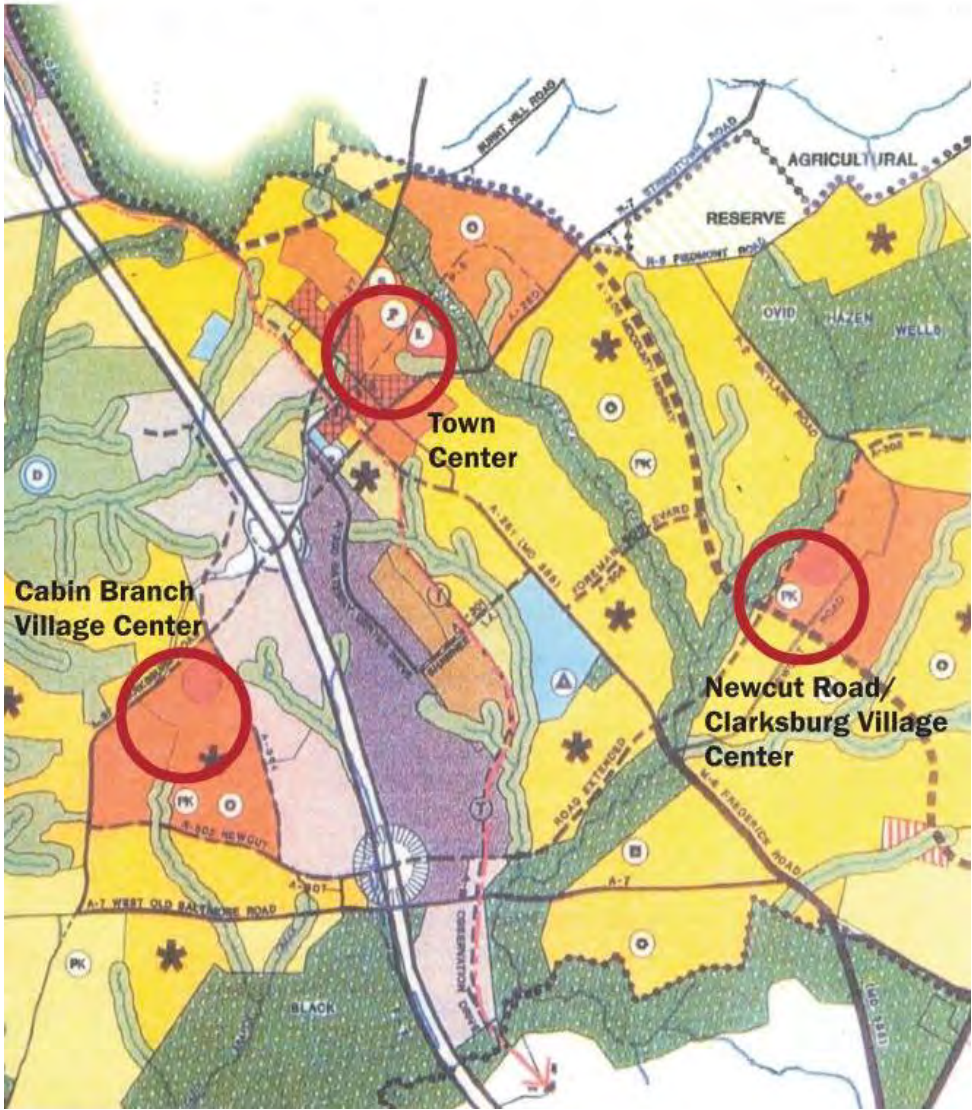
LEARNING FROM PAST MISTAKES

Transit Corridor District Land Use Plan

Figure 22

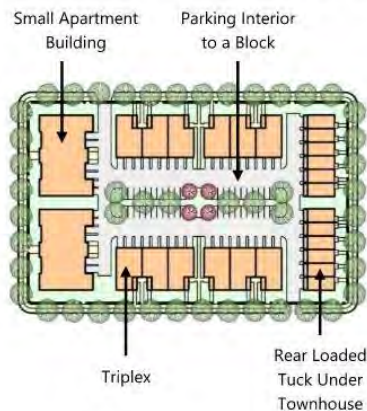


Town Center and Village Centers



THE TIP OF THE ICEBERG

Figure 21: Example Residential Block Diagram



BLOCK DIAGRAMS AND SIZING REQ. P. 57

K2. Limit block size to no longer than 500 to 600 feet in any direction and maximize the number of street intersections within a quarter- to half-mile radius to promote walkability and provide multiple routes of connectivity (see Figure 15).

50% PARKING LOT TREE COVER P. 67

4. Design areas of surface parking lots on public and private property to achieve at least 50% tree canopy coverage of the parking lot area to minimize the heat island effect and provide comfortable and attractive parking areas. If this standard cannot be achieved, consider alternatives such as solar canopies or other shade structures.

MASTER PLAN PG-77 I-270 WILDLIFE CROSSING

amending, or executing plans (Md. Code Ann. Land Use Article § 1-408). Appropriate underpass and overpass structures can improve connectivity for wildlife between natural areas and reduce and prevent collisions with wildlife.

15. The State Highway Administration and/or MCDOT should create wildlife passages at the following locations, listed in order of priority based on accident potential and public safety hazard. (See also Figure 30 and Transportation recommendations.)

Stream Crossings:

- A new passage under the bridge at the planned extension of Observation Drive over Little Seneca Greenway Stream Valley Park and North Germantown Greenway Stream Valley Park.
- A new passage under the bridge at the planned extension of Little Seneca Parkway over Little Seneca Greenway Stream Valley Park.
- With any construction or widening of I-270, a reconstruction of the existing culvert for Little Seneca Creek under I-270.

All roadway stream crossings, including Observation Drive, Little Seneca Parkway, and I-270, should be bridges that allow adequate space for unconstrained stream flow and wildlife to pass under the roadway. Bridges should be as long as possible, with fencing incorporated into the design to funnel deer and other wildlife to these safe crossings. Detailed wetland delineation is required to determine the exact specifications for each bridge.

*Note: Where bridges are not feasible, culverts should be as large as possible with a minimum height of 8 feet and an openness ratio of at least 1.0 when the following formula is applied: width of opening * height of opening / length of culvert. Open-bottom culverts with natural substrate should be utilized when possible.*

I-270 Crossings:

- A new passage over the bridge, at the planned extension of Little Seneca Parkway over I-270.
- With any construction or widening of I-270 or West Old Baltimore Road under I-270, a reconstruction of the existing underpass.

Roadway crossings of I-270 should accommodate natural substrate roadside buffers, should have buffers that are at least 150 feet wide, and should use the design that best satisfies the wildlife passage need (e.g., buffer on one side versus both sides). Wherever possible, the roadway should be separated from the wildlife passage by fencing or jersey barriers, and natural vegetation should be used to both create a more natural passage and to block visibility of the roadway. Corresponding walking and biking path use is acceptable, although it may reduce wildlife's use of passages.

Note: Where a 150-foot buffer is not possible, a 50-foot minimum buffer has been shown to provide significant benefits for wildlife passage.

“CURBLESS” MAIN STREET P.52

(H) New “Street A” - Commercial Shared Street, within Activity Center (70-foot right-of-way)



Note: This cross-section accommodates Complete Street elements for the planned central “main street” that runs through an envisioned mixed-use Activity Center within the former COMSAT Laboratories property. Planned street elements include a curbless street level across the entire right-of-way that helps to equalize the space for all travelers (e.g., drivers, walkers, cyclists, etc.), alternating sides of on-street parking, substantial sidewalk and amenity areas on both sides of the street, and street buffers. This concept represents the overall vision within a mixed-use, dense development; however, lower density levels of development may necessitate differing access needs. (See also Figure 4: Concept Framework Plan for more on the Activity Center)

I-270 50’ NATIVE TREE BUFFER P.68

9. Preserve or plant a native tree and landscape buffer at least 50 feet in width between new development and I-270, or between any solid screening or soundwall and new development, to allow adequate width to support a viable forest stand and to provide air pollution mitigation, heat impact reduction, and a visual buffer from the highway.

KEY CHANGES NEEDED

1. KEEP EXIT 17 AS A POSSIBLE ALTERNATIVE

2. LIMIT EXCESSIVE LAND-TAKES

- REMOVE 35% GREEN COVER REQUIREMENT; I-270 BUFFERS; 8-12 ACRE PARK...

3. CREATING FRAMEWORK FOR ECONOMIC DEVELOPMENT

- MULTIPLE LAND USE OPTIONS VS SPECIFIC MASTER PLAN REQUIREMENTS
- PRESERVE VISIBILITY

4. IMPLEMENT THE CONSTELLATION CONCEPT

- SHARE PUBLIC FACILITY RESPONSIBILITIES
- REMOVE PARK DEDICATION LANGUAGE
- UTILIZE EXISTING LOCATIONS - SCHOOL SITE

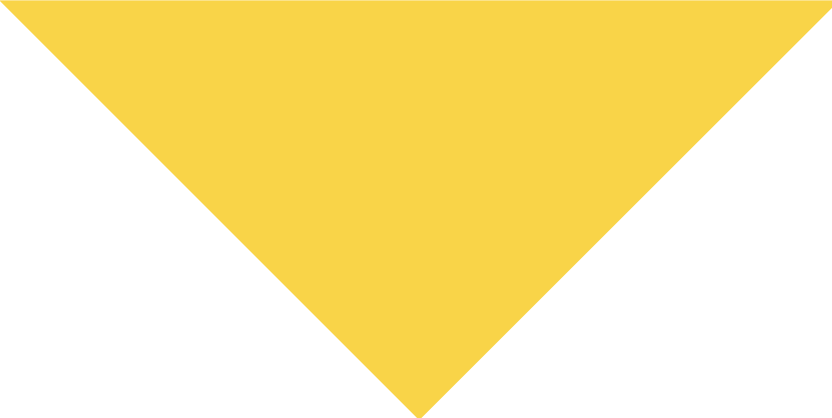
5. PLAN FOR MARKET VIABLE DEVELOPMENT TYPOLOGIES

- ALL SURFACE PARKING AND HORIZONTAL DEVELOPMENT
- REMOVE 50% TREE CANOPY FOR PARKING LOT COVERAGE



An aerial night-time photograph of a city grid. The streets are illuminated with warm yellow lights, and many buildings have their windows lit up, creating a glowing pattern against the dark sky. The city is surrounded by dark green trees and vegetation. Overlaid on the center of the image is large, bold, white text.

**CREATE A FRAMEWORK FOR
A BOLDER VISION OF
REDEVELOPMENT**



THANK YOU

Bob Elliott

301-264-5600

belliott@riverfalls.com.com

River Falls Investments LLC