

From: [Soo Lee-Cho](#)
To: [MCP-Chair](#)
Cc: [Sartori, Jason](#); [Butler, Patrick](#); [Zeigler, Donnell](#); [Larson, Clark](#); [Francoise Carrier](#); [James Proakis <jproakis@jnpicap.com>](#); [William Rogers](#); [Donavon Corum](#); [Matt Leakan](#); [Susan Tater](#)
Subject: JNP/Avanti additional comments for Agenda Item 5 - October 30 Planning Board Meeting re: CGSP Public Hearing Draft
Date: Tuesday, October 28, 2025 12:14:04 PM
Attachments: [JNP-Avanti CGSP Public Hrq Draft Worksession #3 Comment Letter w Exhibit 10 28 2025.pdf](#)

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Please see attached for this Thursday's Planning Board meeting on Agenda Item 5.

Thank you.

Soo



Soo Lee-Cho
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October 28, 2025

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

**Re: Agenda Item 5 – October 30, 2025 Planning Board Meeting re: Clarksburg Gateway
Sector Plan Public Hearing Draft – Worksession #3**

Dear Chair Harris and Members of the Board:

The following are additional comments regarding the Clarksburg Gateway Sector Plan Public Hearing Draft (the “CGSP” or “Draft 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.

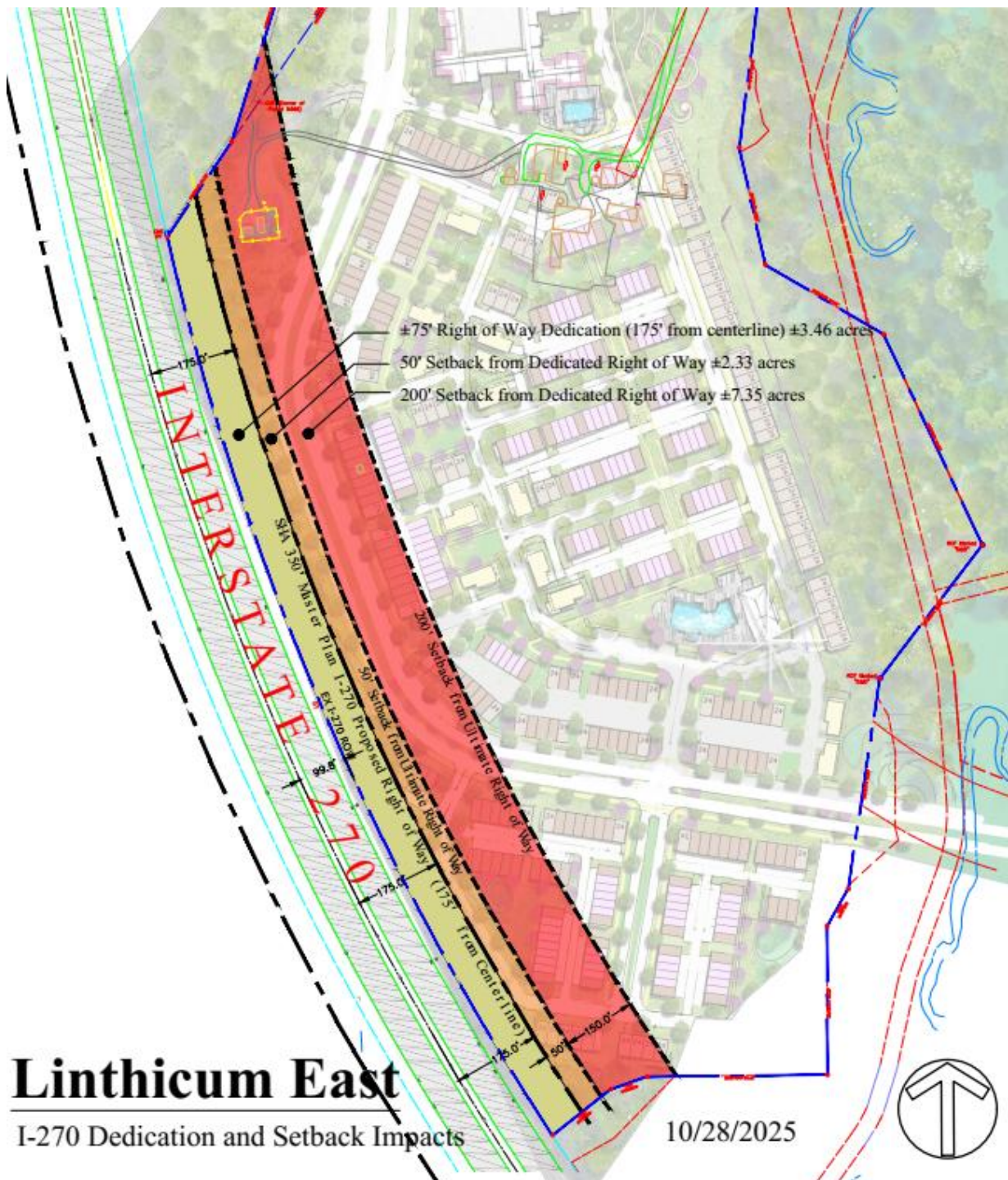
We write in further response to the October 30th Staff Report on Land Use, Housing & Neighborhoods in particular regarding staff’s recommendation to impose a 200-foot setback from I-270 for residential units.

Staff’s Recommended 200’ Setback from I-270 Would Undermine One of the Primary Goals of the CGSP Which is to Facilitate Additional Housing

The Concept Plan that JNP/Avanti prepared for the Linthicum property to advocate for the realignment of Observation Drive, that is now being advanced in the Draft Plan, would be severely undermined by a setback requirement of 200 feet as proposed by staff.

The core principal that drove the Concept Plan was to work with the existing topography of the Property and create a community with strong connections to and engagement with the stream valley to the east. The residential blocks terrace down, working with (and not against) the natural west-to-east slope of the land in order to take full advantage of the scenic views of the stream valley.

Upon closer evaluation, we now estimate that **a 200-foot setback would result in the loss of between 150-180 units, or a 22-26% reduction of units** on the JNP/Avanti Concept Plan due to a cascading effect that would result on the residential blocks. The image below has been prepared to help visualize the extent of the impact.



Staff's recommendation is contrary to the vision of the Draft Plan and the type of community JNP/Avanti seeks to create. We disagree with the premise of the recommendation. It seems to be advocating for an austere standard in case the vision of the Draft Plan, i.e., a far less auto-dependent community for Clarksburg, is not achieved. JNP/Avanti has designed and built projects all over the country that are accessible via roads/highways as well as transit sited close to residential communities. With the level of tree planting that is required under existing County regulations for all new developments, not only as a buffer but incorporated within communities themselves, JNP/Avanti is confident that the residential community created on the Linthicum property will not only be desirable but a highly sought after place to live, work and play.

As previously testified, JNP/Avanti respectfully requests that the Planning Board support a setback for residential of no greater than **75 feet from the ultimate right-of-way of I-270, inclusive of the 50' landscaped buffer.**

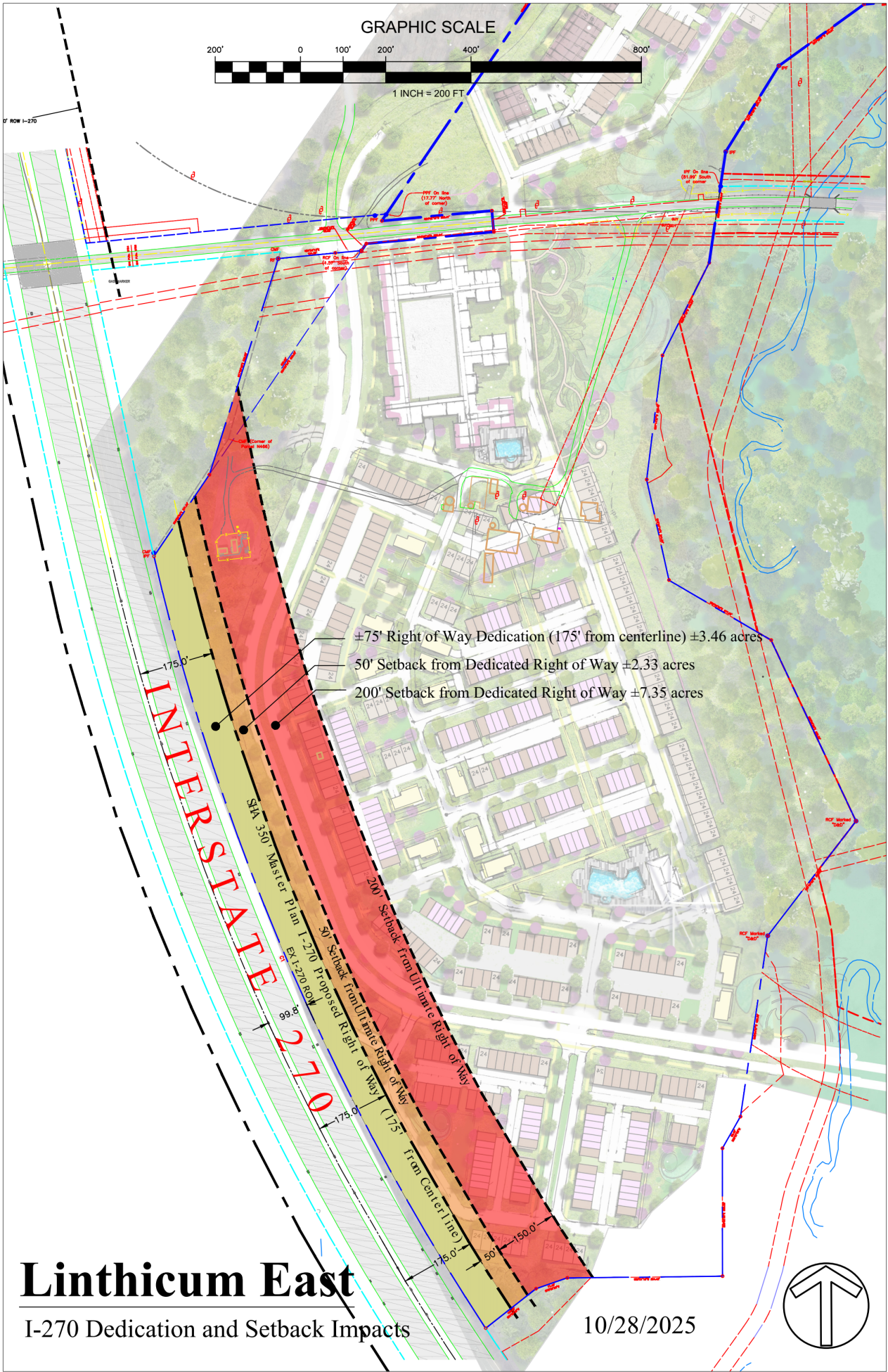
Thank you for your consideration of these additional comments.

Sincerely yours,

BREGMAN, BERBERT, SCHWARTZ & GILDAY, LLC

By: 
Soo Lee-Cho

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.



From: [Robins, Steven A.](#)
To: [Harris, Artie](#); [MCP-Chair](#); [Coello, Catherine](#); [Bartley, Shawn](#); [Pedoeem, Mitra](#); [Hedrick, James](#); [Linden, Josh](#)
Cc: [Kronenberg, Robert](#); [Sartori, Jason](#); gunterberg@rodgers.com; [Bob Elliott](#); [Mike Alexander](#); [Casey Blair Anderson \(canderson@rodgers.com\)](mailto:Casey Blair Anderson (canderson@rodgers.com)); [Butler, Patrick](#); [Zeigler, Donnell](#); [Larson, Clark](#); [Robins, Steven A.](#); [Brockmyer, Richard](#)
Subject: River Falls Submission for Worksession #3/Clarksburg Gateway Sector Plan
Date: Wednesday, October 29, 2025 11:43:44 AM
Attachments: [CGSP Work Session 3 - R F Submission 10 29 2025.pdf](#)
Importance: High

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Dear Chair Harris and Members of the Planning Board,

Attached are the documents that address the matters River Falls Investments LLC considers most important for the Planning Board's attention during Worksession #3 for the Clarksburg Gateway Sector Plan.

- A "Global Comments" document that addresses the concerns raised by the Board at the last worksession, stating that the Sector Plan should allow for significant flexibility in its interpretation and implementation. River Falls provides broad language that should be included in the preamble of the Sector Plan. We believe this language aligns with the guidance the Board provided to Staff on this issue.
- A document titled "Comsat Property Issues for Decision: Land Use" primarily addresses (i) development constraints and the amount of property lost due to Staff's Recommendations, and (ii) the setback along I-270. We have included illustrative sections that support the setback River Falls recommends for certain residential development. This document also references the general disclaimer found in the "Global Comments" document discussed above.
- A document titled "Comsat Property Issues for Decision: Housing" discusses River Falls' recommendation for MPDUs in the Plan. It also references the general disclaimer found in the "Global Comments" document mentioned above.
- A document titled "Comsat Property Issues for Decision: Community Design" addresses a number of recommendations from the Community Design section of the Plan and also references the general disclaimer in the "Global Comments" document discussed above.

We request that, in addition to the materials referenced above, the Board also consider the following:

1. The Planning Board's review of the Neighborhood Districts section of the Plan.

The Board's agenda suggests that Neighborhood Districts might be discussed during the morning work session, even though the Staff Report does not include any mention of it, for example, in relation to the 12 recommendations outlined in the Plan for the Comsat Property (or for other properties as well). Our concern is twofold: topics not scheduled for discussion until future work sessions, but also appearing in the Neighborhood Districts section of the Plan should not be discussed this Thursday. We believe the Staff indicated that this would not happen. Even so, we think it would be helpful for the Planning Board to review, at its November 20th work session, the full list of Neighborhood Districts recommendations after completing work on the various topics during scheduled work sessions. This approach would benefit all property owners and interested parties and ensure that the recommendations in the Neighborhood Districts section align with the Plan that has been thoroughly reviewed by the Board.

2. Additional Transportation Review. At the Worksession #2, the Planning Board decided to retain the Exit 17 Interchange in the plan. As part of this recommendation, the Board indicated that it would choose a preferred option (Option B or C) at the November 20th worksession after considering input from Staff and River Falls. As part of the second transportation session on November 20th, River Falls respectfully requests that the Board also discuss:

- Recommendations in the Plan concerning various street sections. These recommendations present implementation challenges and should be discussed with Staff, River Falls, and other interested property owners at the worksession. While our proposed general disclaimer in the "Global Comments" document provides flexibility, issues and concerns regarding street sections, such as Street A, still warrant discussion.
- The alignment of Observation Drive near the property boundaries of the Comsat Property and Linthicum Property, just north of West Old Baltimore Road and south of Little Seneca, raises concerns. River Falls believes that the proposed alignment shifts most of the road at this location onto the River Falls property to its detriment—an alignment not referenced in past documents or in the current MCDOT design plans for Observation Drive. This issue has yet to be discussed by the Board. This recommendation should be considered alongside the recommendation to shift the alignment of the remainder of the road on the Comsat property to the west, connecting with Gateway Center Drive. River Falls strongly supports this alignment, despite the impact it has on River Falls losing more developable land. We have repeatedly noted that it is the right thing to do.

- River Falls' proposal to close the W. Old Baltimore Road to vehicular traffic (but only AFTER the construction of the Little Seneca overpass/interchange), is a significantly less expensive option that aims to provide a high-quality wildlife crossing and pedestrian access point to Black Hills Park on the east side of I-270, where the County already owns land. This change would involve rerouting the road to ensure a continuous circulation pattern. The Board briefly discussed this proposal at its first worksession on transportation and asked Staff to consider it, presumably for future discussions.

River Falls will provide the Staff and the Board with a comprehensive document on Neighborhood Districts and transportation concerns after the November 6th worksession.

I want to emphasize how much we appreciate your consideration of our positions. We will attend the work session and be ready to answer questions or discuss our positions.

Thank you,

Steve Robins

Steven A. Robins, Attorney

Lerch, Early & Brewer, Chtd. rising to every challenge for 75 years

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Global comment

River Falls is concerned that the Draft Plan includes several passages or images that may interfere with its ability to move forward with development quickly after adoption or lend themselves to misinterpretation. We suggest that the Planning Board include text in the introduction to the plan explaining that (1) the figures and diagrams in the plan are intended only as illustrative examples, (2) acknowledge that many of the proposed development concepts contained within the plan may not work economically today but that early phases of development should establish a foundation for achieving the ultimate goals of the plan over an extended period of time and (3) the recommendations should be applied flexibly with openness to alternative approaches that achieve the plan's aims.

Discussion

In some instances, the staff has recognized the potential for misinterpretation or excessively prescriptive application of recommendations and included appropriate qualifying language. For example, Figure 24 (on page 62) depicts a development scheme that is inconsistent with the plan's recommendations for a buffer along I-270 and for preservation of all existing forest stands. The caption under Figure 14 clarifies that the development scheme is intended only as an illustration of one possible approach and says the image should not be interpreted to preclude alternative concepts that are consistent with the plan's goals. Unfortunately, the staff draft does not include a similar explanatory note for many other images. For example, Figure 15 on page 57, as well as Figure 21 and the other images on page 61, imply an inappropriate degree of specificity.

The Draft Plan recommends intensive development types including tall buildings, structured parking, and other features not currently supported by market conditions in the plan area. While many of these recommendations are framed as desirable but not mandatory (with the use of words like "consider" or "where possible"), River Falls believes the plan should set realistic expectations about the need to accommodate the transition from a low-density development pattern to more intensive types of development, with initial phases of development helping to lay the groundwork for a vibrant, mixed use complete community.

The Draft Plan includes several provisions that seem to have highly specific outcomes in mind, such as the Neighborhood Recommendations that seem to anticipate primarily residential development with small-scale retail using a very specific type of "Main Street". River Falls hopes to attract significant employment-related uses such as life sciences research and office space and believes that at least one large retail tenant is necessary both to support smaller, neighborhood-serving retailers and to compete for the kinds of employment uses that will serve the County's economic development objectives. The plan should acknowledge that the



mix and relative proportion of uses – like the possibility that an interchange will be needed – will depend on market conditions and other factors that cannot be predicted with certainty.

Proposed Additional Language

A blanket disclaimer would avoid the need to place separate qualifying language in every part of the plan that raises the concerns River Falls has identified and protect against unforeseen consequences of the rigid application of recommendations that prove unworkable in light of conditions at the time of development. We propose including the following introductory text:

“The diagrams, figures, and images depicted in the plan are provided only for illustrative purposes and are intended to illustrate the general design recommendations and character of development envisioned by the plan. They should not be interpreted as specific requirements, nor should they be read to restrict or preclude alternative design solutions that are consistent with the overall principles and objectives of the plan.

“The first stages of development under this Plan are expected to help begin building a grid of streets, adding recreational facilities and other infrastructure, and establishing a framework for future intensification and infill. These early stages of development should be compact but are likely to be surface parked with uses mixed horizontally and not vertically. Over time, as development proceeds, the area will gradually support a wider variety of uses, services and parking typologies. Development proposed in these early stages should be evaluated accordingly, with the objective of establishing a foundation for the ultimate goal of creating a complete community with a range of uses, building types, and mobility options.

“The plan’s recommendations should be applied with flexibility in recognition of the inherent uncertainty about the infrastructure and design decisions that will be needed to support the mix of uses that are ultimately delivered. Each development application should endeavor to move the area toward the desired urban form while recognizing there are limits to what the market can support in the plan area in the near term.”



Comsat Property Issues for Decision: Land Use

River Falls asks the Planning Board to address the following two issues:

COMSAT Development Constraints Analysis (P. 12, Work Session #3 Report)

River Falls stands by its accounting of how much developable land is constrained by the Plan's recommendations, but rather than engage in a back-and-forth about which chart is more accurate and complete, we note that Planning Staff acknowledges that only 46% of the Comsat Property would be available for development if the Plan recommendations are adopted without modification. When this many constraints are imposed on land, the opportunities to offer sites to major employers or to build more housing are whittled away. As experienced land developers, for a site of this size and scale, River Falls expected a gross yield closer to 65-75%, even when factoring in a large natural feature like the stream valley. Based on analysis from Rodgers Consulting, civil engineers for both the prior ownership, LCOR, as well as River Falls, their analysis from 2014 showed "buildable" area at approximately 140 acres (see attached). Planning Staff's current recommendations result in a reduction of almost 50 acres or almost 25% of the property, from what may have otherwise been inferred from the 1994 Master Plan. Staff's analysis, which again shows that less than 50% of the site could be developed, demonstrates that there is no dispute that the Plan's constraints would result in the loss of hundreds of housing units and/or hundreds of thousands of square feet of commercial space that could support the County's economic development goals.

Land in Montgomery County is at an all-time premium, particularly in well-located areas. Housing in Montgomery County is increasingly less affordable and the Upcounty is one of the County's most diverse communities and arguably, one of its greatest sources of affordable housing options. The Planning Department is admittedly behind on its own housing production goal of 30,000 units in this decade. Simple math demonstrates that 50 extra acres could yield approximately 500 townhouse units (10du/acre) to as 1,200 apartment units (24du/acre). If allowed to develop properly, this acreage could account for 1.6-4.0% of the County's housing production goal for this decade. And all from a single transformational property!

River Falls asks that the Planning Board direct the staff to take the following steps:

- Clarify that the 35 percent green cover requirement allows credit for forest conservation easements, trees and vegetation in the right-of-way and other public spaces. River Falls will submit clarifying language to Staff and Planning Board to review for the next worksession on November 6;
- Eliminate or reduce the proposed I-270 setback for residential development;
- Reject the repeated Sector Plan recommendations for forest retention beyond the already highly restrictive provisions of existing law;
- Adopt the string-of-pearls recommendation for Constellation Recreational Park, including distribution of park amenities across all public and private properties; and
- Include guidance supporting a more equitable alignment of Observation Drive.



REPLACE IN ITS ENTIRETY ALL OF THE LANGUAGE in Land Use Recommendation #3 (Page 31) with the following:

3. Along I-270, maintain a soundwall with a forest buffer of 50 feet in depth in locations where residential buildings directly abut I-270 in order to minimize noise and air pollution impacts on residents from the highway. This recommendation does not apply to residential buildings that employ noise, air quality and filtration measures applicable to commercial/multi-family construction types.

River Falls Rationale:

- See Plan and Section (attached) showing Residential and Commercial Conditions.
- As written, Land Use Recommendation No. 3 (p. 31) imposed a minimum 200-foot I-270 residential building setback which severely reduces the amount of developable land on the Comsat site by more than 18 acres (~9% of gross property area), with an additional reduction impacting the Linthicum's property.
 - This recommendation also does not account for any factors other than distance from I-270 that will influence air quality and noise experienced by occupants of nearby buildings.
 - The proposed modification would provide for enhanced air quality and noise mitigation beyond what is required by any other area plan or regulation and reflects the EPA's findings that noise walls combined with vegetative buffers can reduce particulate pollution reaching nearby residents from busy roads by 50 percent.
 - This modification also recognizes that apartment buildings and other large-scale residential structures are considered "commercial" for purposes of the building code and employ more sophisticated HVAC systems and other air quality measures than single family detached houses or townhomes.

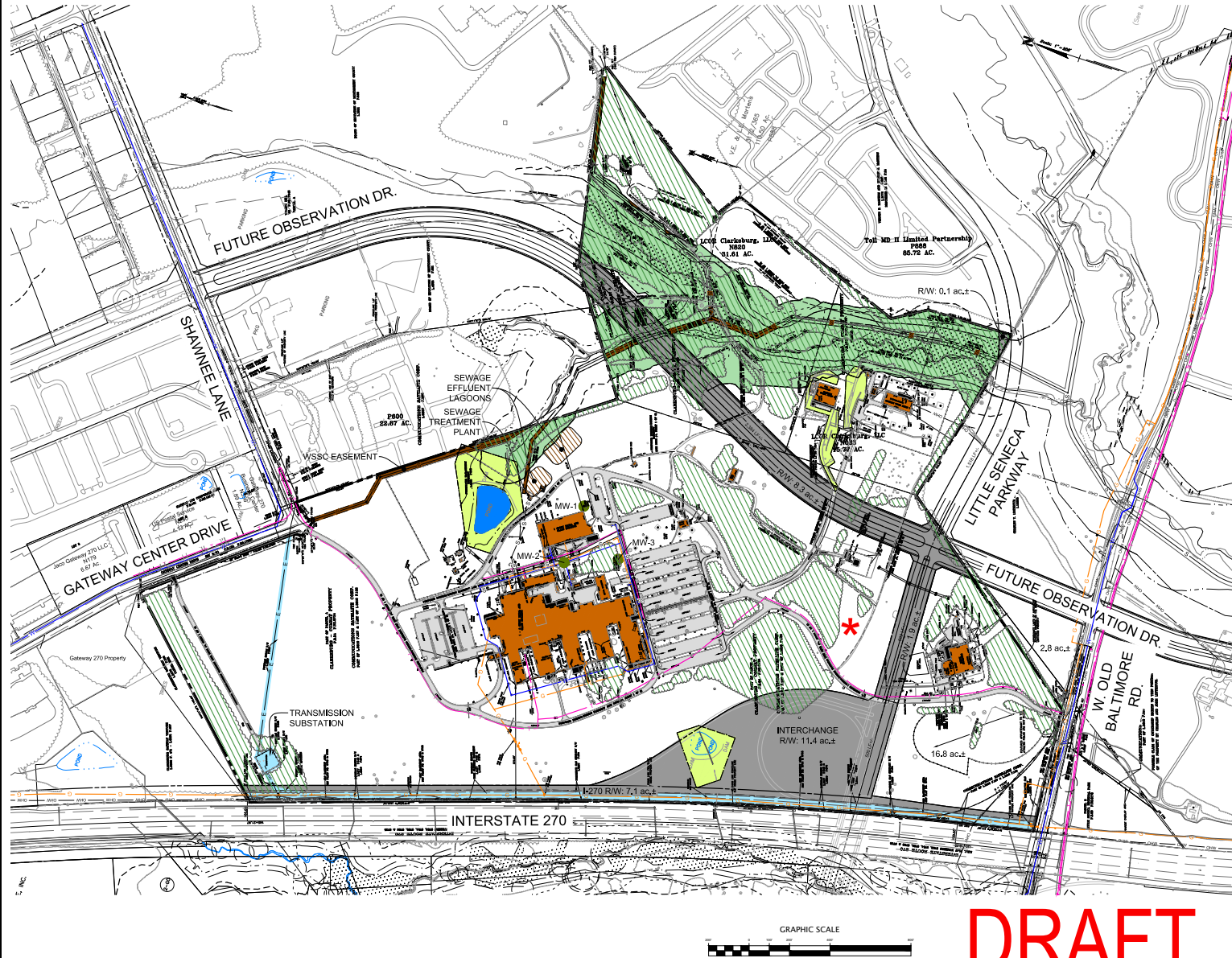
THE PLANNING BOARD HAS EXPRESSED ITS DESIRE TO ENSURE FLEXIBILITY WHEN IMPLEMENTING THIS SECTOR PLAN. RIVER FALLS HAS SIMILAR CONCERNS AND WOULD LIKE TO PROTECT AGAINST UNFORESEEN CONSEQUENCES OF THE RIGID APPLICATION OF SPECIFIC PLAN LANGUAGE, ILLUSTRATIONS AND RECOMMENDATIONS THAT LEND THEMSELVES TO MISINTERPRETATION OR COULD PROVE UNWORKABLE IN LIGHT OF CONDITIONS AT THE TIME OF DEVELOPMENT.

PLEASE SEE ATTACHED GLOBAL COMMENT WHICH CONTAINS A PROPOSED BLANKET DISCLAIMER THAT WOULD AVOID THE NEED TO PLACE SEPARATE QUALIFYING LANGUAGE IN EVERY PART OF THE PLAN.

SITE: 203.7 AC±

LEGEND

- STREAM VALLEY BUFFER
24.2 ac.±
- Approximate location of sewage
effluent lagoons & treatment plant
(per H.O.K. Comsat East Wing
Plan, 1981)
- PLANNED R/W
OBSERVATION DRIVE: 8.3 AC
LITTLE SENECA PKWY: 2.8 AC
INTERSTATE 270: 7.1 AC
INTERCHANGE: 11.4 AC
- * APPROX. LOCATION OF MASTER PLAN PARK
AND RIDE LOT/TRANSIT STATION
- EXISTING BUILDINGS
- EXISTING SWM EASEMENT
- EXISTING POND
- EXISTING PAVING
- EXISTING TREES
- EXISTING WSSC EASEMENT
- EXISTING SEWER
- EXISTING P.E. EASEMENT
- EXISTING ELECTRIC
- EXISTING OVERHEAD WIRE
- EXISTING GAS
- EXISTING TELEPHONE
- EXISTING WATER
- MW MONITORING WELL
- PROPERTY LINE



REVISION	DATE	REVISION	DATE	REVISION	DATE	Prepared for: Lantian Development 4341 Montgomery Avenue Bethesda, MD 20814 Ph: (202) 748-7696

EXISTING FACILITY EXHIBIT
9/11/15



DATE	BY	DATE

LCOR-Clarksburg, LLC

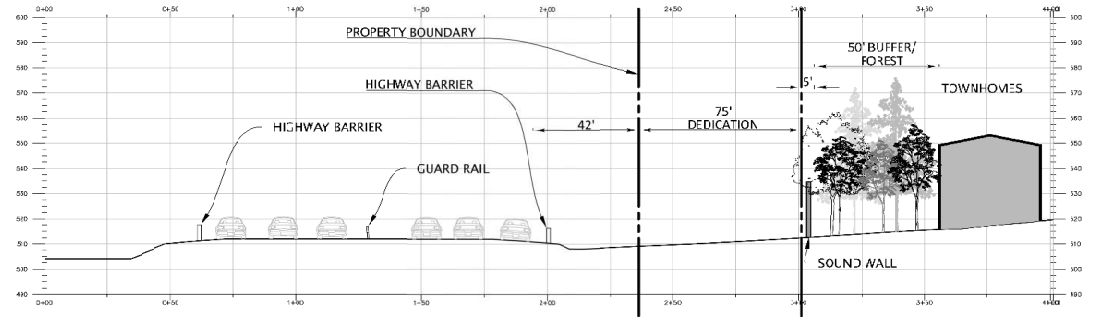
L. 3610 F. 127; L. 3610 F. 362
Clarksburg (2nd) Election District
Montgomery County, Maryland

SCALE: 1"=200'
SHEET NO. 1193A
DATE: Sep, 2015
SHEET NO. 1 of 1

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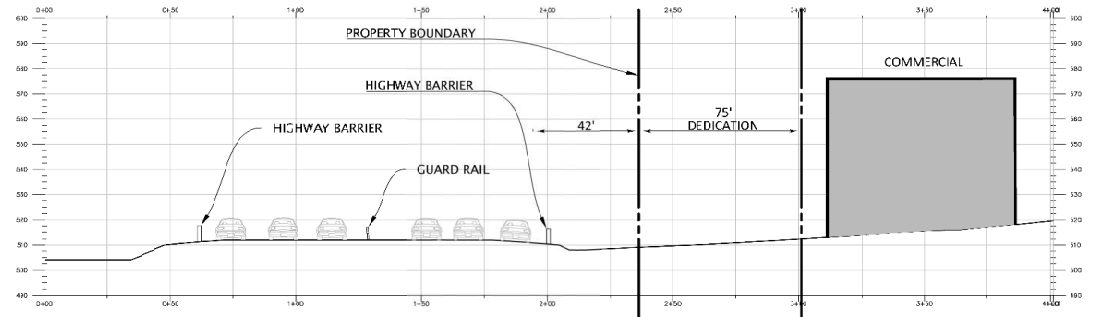


KEY MAP



RESIDENTIAL CROSS SECTION A-A'

PROFILE SCALES
HORIZONTAL: 1"=20'
VERTICAL: 1"=20'



COMMERCIAL CROSS SECTION A-A'

PROFILE SCALES
HORIZONTAL: 1"=20'
VERTICAL: 1"=20'



REVISION	DATE	REVISION	DATE	REVISION	DATE	Prepared for:
						COMSAT
						River Falls Investments
						4341 Montgomery Avenue
						Bethesda, MD 20814
						Contact: Mr. Rob Elliott

SECTIONS
10/23/2025

**RODGERS
CONSULTING**
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BY	DATE
BASE	
DESIGN	
DRAWN	
REVIEWED	
DESIGNED	
RELEASE FOR	
BY	

COMSAT

L: 3610 F: 127; L: 3610 F: 362
Clarebury (2nd) District
Montgomery County, Maryland

SCALE: 1"=120'
JOB No: 1193A1
DATE: OCT 2023
DATE: 10/23/25



Comsat Property Issues for Decision: Housing

River Falls asks the Planning Board to decide the following issues related to Clarksburg Gateway Sector Plan (CGSP) Draft as follows:

INSERT THE FOLLOWING UNDERLINED LANGUAGE in Housing Recommendation #1 (Page 55):

1. For development projects seeking approval under the Optional Method of Development in the Commercial Residential and Commercial Residential Town zones, all new developments should provide at least 15% MPDUs.

River Falls Rationale:

- River Falls understands and appreciates the importance of affordable housing and MPDUs for Montgomery County, but the increase from 12.5% to 15% MPDUs is traditionally tied to either:
 - Use of the Optional Method of Development
 - Demographic Studies untaken in Montgomery County on an annual basis
 - The County recently reviewed the use of 15% MPDUs and for now the additional requirement is limited to more affluent parts of the County.

THE PLANNING BOARD HAS EXPRESSED ITS DESIRE TO ENSURE FLEXIBILITY WHEN IMPLEMENTING THIS SECTOR PLAN. RIVER FALLS HAS SIMILAR CONCERNS AND WOULD LIKE TO PROTECT AGAINST UNFORESEEN CONSEQUENCES OF THE RIGID APPLICATION OF SPECIFIC PLAN LANGUAGE, ILLUSTRATIONS AND RECOMMENDATIONS THAT LEND THEMSELVES TO MISINTERPRETATION OR COULD PROVE UNWORKABLE IN LIGHT OF CONDITIONS AT THE TIME OF DEVELOPMENT.

PLEASE SEE ATTACHED "GLOBAL COMMENT" WHICH CONTAINS A PROPOSED BLANKET DISCLAIMER THAT WOULD AVOID THE NEED TO PLACE SEPARATE QUALIFYING LANGUAGE IN EVERY PART OF THE PLAN.

Comsat Property Issues for Decision: Community Design

River Falls asks the Planning Board to decide the following issues related to Clarksburg Gateway Sector Plan (CGSP) Draft as follows:

REVISE LANGUAGE in Community Design Goals as follows:

Streets (S), P. 57

- S1. Establish an interconnected hierarchy of streets within new developments and throughout the Plan Area, limiting service and parking access to secondary, tertiary, or alley streets to the extent practicable.
- S4. New streets should accommodate on-street parking, where possible, to help slow vehicular speeds and provide places for residents and visitors to park. On-street parking and other decisions about allocation of space in the right-of-way will depend on the uses and development types proposed on each block.

River Falls rationale:

- For all Street Recommendations, we would note that there are no specific recommendations that relate to larger-scale Commercial Development, more specifically Employment or Retail uses that may require higher traffic volumes.
- We believe that it is important to clarify that certain forms of retail or employment development should have easy access to surface parking lots. Further, within these types of development uses, street typologies where significant peak volumes may be encountered, parallel street parking may negatively impact road capacity and flow.

Blocks (K), P. 57.

REVISE RECOMMENDATION K2 AS FOLLOWS:

- K2. Target block sizes should be in the range of 500 to 600 feet in any direction, but these dimensions may need to be adjusted to accommodate specific uses requiring larger blocks. The street grid should be designed to 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).

River Falls Rationale:

- We understand the desire for a street grid but need flexibility for larger blocks where required by large commercial uses.



- Figure 15 should be labeled “Residential Intersection Spacing Diagram”.
 - Delete “...and offers more potential for on-street parking in the neighborhood.”. Shorter blocks may provide more or fewer opportunities for on-street parking depending on the number and location of driveways, fire hydrants, and other infrastructure.
- Recommendation K2 should clarify that the length and size of blocks and spacing of intersections will be determined in many cases by the needs of the use proposed for the block and adjacent parcels.

Buildings (B), P. 59-62

REVISE RECOMMENDATION B₃ AS FOLLOWS:

B₃. If a development features larger single-use retail tenants, such as a grocery store or other big-box uses, the street facing façades should be made as active and engaging as possible in light of their intended use.

- River Falls is concerned with the impact of design criteria requiring elaborate street front activation strategies for surface parked, “interim” retail uses. Certain uses such as grocery stores and big box users often do not permit “liner” retail and potential limit access and visibility for security reasons.

REVISE RECOMMENDATION B₈ AS FOLLOWS:

B₈. To the greatest extent possible, avoid front-loaded driveways or garages for detached and attached residential developments, except where unit typologies or site constraints limit rear loading options, to create attractive, walkable streets with sidewalks that are uninterrupted by curb cuts and to provide for ample on-street parking (See Figure 23).

- River Falls appreciates the desire to avoid front-loaded driveways and consolidate curb cuts as much as possible, but the plan should acknowledge that the ability to accommodate these preferences depends on context.

THE PLANNING BOARD HAS EXPRESSED ITS DESIRE TO ENSURE FLEXIBILITY WHEN IMPLEMENTING THIS SECTOR PLAN. RIVER FALLS HAS SIMILAR CONCERNS AND WOULD LIKE TO PROTECT AGAINST UNFORESEEN CONSEQUENCES OF THE RIGID APPLICATION OF SPECIFIC PLAN LANGUAGE, ILLUSTRATIONS AND RECOMMENDATIONS THAT LEND THEMSELVES TO MISINTERPRETATION OR COULD PROVE UNWORKABLE IN LIGHT OF CONDITIONS AT THE TIME OF DEVELOPMENT.



RIVER FALLS
I N V E S T M E N T S



4341 Montgomery Avenue
Bethesda, MD 20814



(301) 388-5600

PLEASE SEE ATTACHED GLOBAL COMMENT WHICH CONTAINS A PROPOSED BLANKET
DISCLAIMER THAT WOULD AVOID THE NEED TO PLACE SEPARATE QUALIFYING
LANGUAGE IN EVERY PART OF THE PLAN.

From: [Peckett, Haley](#)
To: [MCP-Chair](#); [Harris, Artie](#)
Cc: [Brockmyer, Richard](#); [Larson, Clark](#); [Zeigler, Donnell](#); [Butler, Patrick](#); [Anspacher, David](#); [Kronenberg, Robert](#); [Pitts, Corey](#); [Van Alstyne, Chris](#)
Subject: Transportation Metrics - Clarksburg Gateway Sector Plan
Date: Monday, October 27, 2025 4:31:16 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

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Dear Chair Harris,

Thank you for the productive transportation work session on Thursday for the Clarksburg Gateway Sector Plan. One area that remains a concern for MCDOT but that did not come up in yesterday's work session is the transportation metrics, documented in Appendix K. Planning staff have been responsive to our requests (in our 9/12/25 memo to Planning Board) by re-running the travel model to consider lower future growth levels, but we remain concerned about model results.

We invite you to consider having a conversation about the future performance of the transportation network under proposed growth scenarios, either at a future work session or a separate forum. As transportation planners, we do not have an easy solution to the anticipated degradation of the transportation network. However, we have heard that mobility investments are a priority for current Clarksburg residents, and we believe that this plan should be transparent about the potential impacts of buildout.

Thank you for your consideration.

Haley Peckett, AICP
She/her
Deputy Director, Transportation Policy and Planning

Director's Office
Montgomery County Department of Transportation
101 Monroe Street, 10th Floor
Rockville, MD 20850
240-429-4163
haley.peckett@montgomerycountymd.gov



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