

From: [Soo Lee-Cho](#)
To: [MCP-Chair](#)
Cc: [Sartori, Jason](#); [Butler, Patrick](#); [Zeigler, Donnell](#); [Larson, Clark](#); [Francoise Carrier](#); [James Proakis](#) <jproakis@jnpccap.com>; [William Rogers](#); [Donavon Corum](#); [Matt Leakan](#); [Susan Tater](#)
Subject: JNP/Avanti additional comments for Agenda Item 6 - November 20, 2025, Planning Board Meeting re: CGSP Public Hearing Draft
Date: Sunday, November 16, 2025 7:27:38 PM
Attachments: [CGSP Work Session #6 Comment Letter to Planning Board 11 16 2025 final.pdf](#)
Importance: High

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Chair Harris and Members of the Planning Board,

Please see attached comment letter, submitted on behalf of JNP/Avanti, in advance of this Thursday's Planning Board meeting on Agenda Item 6 regarding the Clarksburg Gateway Sector Plan.

Thank you.

Soo



Soo Lee-Cho

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November 16, 2025

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

**Re: Agenda Item 6 – November 20, 2025, Planning Board Meeting re:
Clarksburg Gateway Sector Plan Public Hearing Draft – Work Session #6**

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 appreciate the work of Staff and the Board over the last several weeks to continue refining the Plan. Prior to Work Session #6 and final recommendations of the Board, JNP/Avanti hopes to clarify its position on several outstanding issues that were discussed at prior Work Sessions.

1. Clarksburg Gateway Local Park (“Constellation Park”) – Parks, Open Spaces, and Recreation Recommendations

In its public hearing testimony on September 25, 2025, and again during Work Session #5 on November 3, 2025, River Falls, LLC (“River Falls”), owner of the COMSAT property, testified regarding what it referred to as a “string of pearls” or “constellation of parks” concept for the **Clarksburg Gateway Local Park** desired by the Draft Plan. Described as a system of several small, separate but connected park areas with distinct uses, the idea was pitched by River Falls as being preferable to Staff’s recommendation for a contiguous 8- to 10-acre park “**on the former COMSAT Laboratories property**” – found under the *Parks, Open Spaces, and Recreation Recommendations* at pages 74-75 as well as in the *COMSAT Neighborhood* section at pages 94-95 of the Draft Plan.

Clarksburg Gateway Local Park should be centrally located and easily accessible within the Plan Area along the Observation Drive corridor on the former COMSAT Laboratories property.

Draft Plan at page 74

B. COMSAT NEIGHBORHOOD

10. Locate a new Clarksburg Gateway Local Park in this neighborhood to serve the wider Clarksburg community and help realize the broader vision and goals of the Plan and its specific goals for parks, open spaces, and recreation. The park should be centrally located and easily accessible within the Plan Area along the Observation Drive corridor. (See also Parks, Open Spaces, and Recreation recommendations.)

Draft Plan at page 95

Notably, Staff already contemplated, as an alternative to a contiguous 8- to 10-acre park, that “an integrated set of smaller spaces with distinct uses that are visually connected” **on the COMSAT property** could be acceptable, and included language in the Draft Plan as follows:

The objectives for this park could be met by creating a single 8- to 10-acre park or possibly via an integrated set of smaller spaces with distinct uses that are visually connected, are easy to walk between, and give the feeling of a single park experience. Because the COMSAT site is not fully built out, a single, contiguous 8- to 10-acre park is feasible. Should the integrated set of smaller spaces option be pursued, each space should have a compelling destination-type amenity known to attract users, such as a dog park, pickleball courts, or a skate park.

Draft Plan at pages 74-75

However, on both occasions when River Falls presented its “string of pearls” plan, it submitted exhibits showing several park areas proposed on properties other than COMSAT, including the Linthicum property. While JNP/Avanti takes no position as to the appropriate size, quantity, or composition of park

facilities that the Planning Board should recommend for the COMSAT property, we strongly object to River Falls' unilateral attempt to locate parks on other people's properties to try and get out from under the Draft Plan's recommendations for COMSAT.

JNP/Avanti has already gone to great lengths on its concept plan for the Linthicum Property to incorporate adequate park and public open space amenities for the proposed residential neighborhood and takes the issue of providing an environment that supports ample recreational opportunities for its future residents very seriously. JNP/Avanti plans to implement its own system of pocket parks, greenways and green connections, stream valley enhancements, environmental site design, and community gathering spaces that will comply with the Draft Plan's desire for passive recreation in the *Linthicum Neighborhood* via *privately owned public spaces or POPS*.

C. LINTHICUM NEIGHBORHOOD

6. Public open space required as part of new development should include one or more larger POPS that are welcoming and foster opportunities for social connection, exposure to nature, and passive recreation. New POPS should include neighborhood-serving amenities, such as community gardens, playgrounds, benches, and picnic shelters.

Draft Plan at page 96

Moreover, JNP/Avanti intends to proceed with seeking entitlements for the Linthicum Property soon after the related sectional map amendment is adopted to implement the zoning changes recommended in the Clarksburg Gateway Sector Plan. JNP/Avanti objects to any language in the Draft Plan that could potentially be used to link proposed amenities shown on a future Linthicum development plan with what may or may not be provided on COMSAT, especially since River Falls has repeatedly stated to the Planning Board that its timing for moving forward with development is unknown and appears to be dependent on a multitude of factors beyond its direct control.

Accordingly, JNP/Avanti requests the following modification to Staff's proposed plan revision text (in two places) to make clear that the intended siting of "Clarksburg Constellation Park" is **not** on the Linthicum Property:

Staff recommends replacing the “Clarksburg Gateway Local Park” section beginning on Draft Plan page 74 with the following:

Clarksburg Constellation Park

Although the larger Clarksburg area is surrounded by high-quality parks, there are very few places for recreation that are centrally located within the Clarksburg Gateway Sector Plan area. During this master planning process, Clarksburg area residents emphasized the importance of active park amenities that invite people to do more, stay longer, and enjoy themselves in different ways. Furthermore, the 2022 *Parks, Recreation & Open Space* (PROS) plan calls for the integration of parks and recreational amenities that encourage healthy physical activity and social interaction in every neighborhood.

12. In response to the community’s input on parks and in accordance with the 2022 PROS Plan, this Sector Plan recommends the creation of the Clarksburg Constellation Park to serve the growing Clarksburg community. Establishing new public park and recreation amenities will meet community needs by contributing to a high-quality, community-defining set of facilities and spaces. These amenities should be designed to integrate with and contribute to the successful redevelopment of the Plan Area.

- a. **Configuration** – The new recreation amenities may be implemented as either a single public park or as a network of connected public parks with distinct uses that achieve the goals described in this section of the Plan. The park(s) should be centrally located in the Plan area, ~~along or near~~ the new alignment of Observation Drive, and to the extent possible should be proximate to residential development. Alternative configurations may be approved by the Parks Department and Planning Board. Park elements should be configured to complement the Plan’s goals for public and private development. They should be connected to one another and the surrounding community, readily accessible by people walking, biking, and rolling, and give the feeling of a truly integrated park experience. The recreation elements must include a variety of amenities that encourage physical activity and social interaction, as described in the following Amenities and Implementation Process sections.

west of

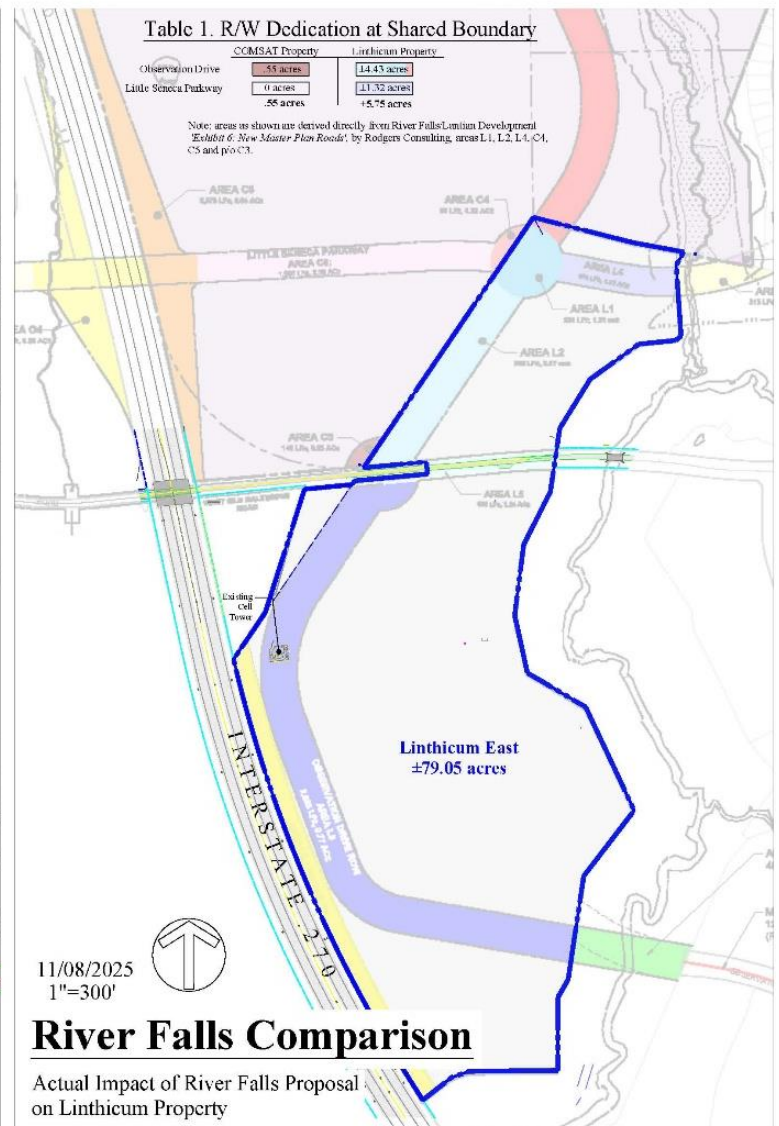
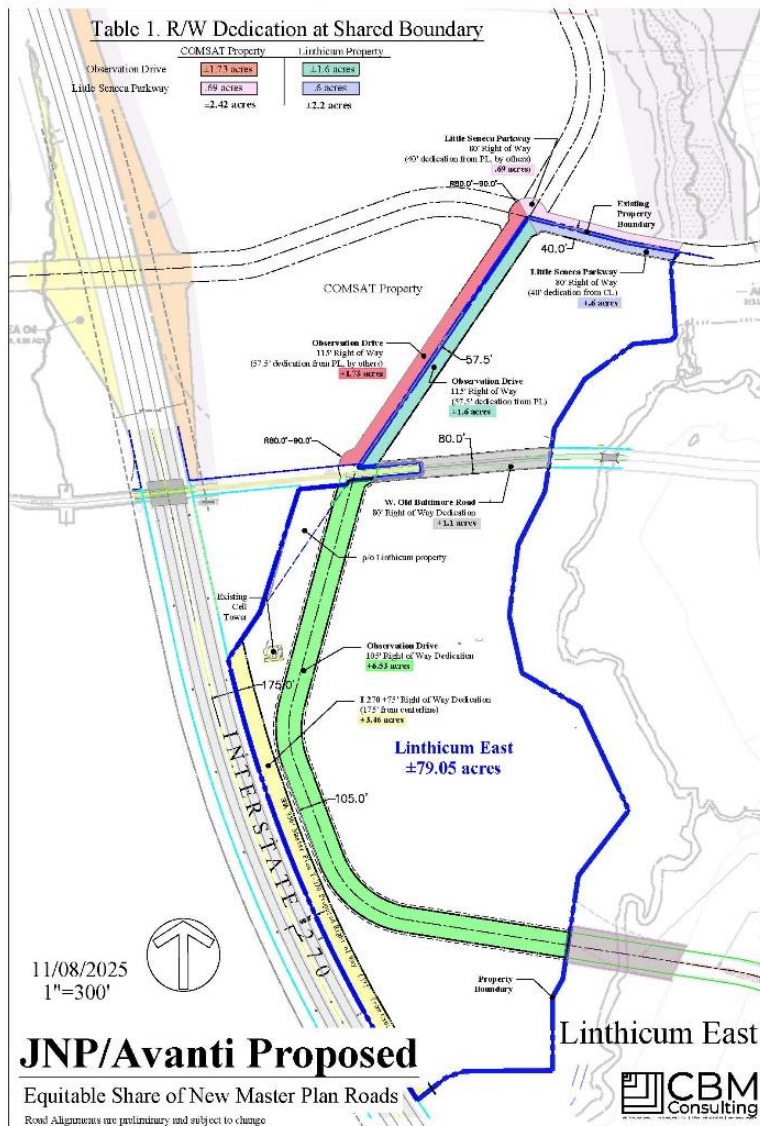
3. **Implementation Process** – The scale, form, location, and configuration of the Clarksburg Constellation Park will be determined by the Planning Board during the development review process. Likewise, the final design and location of the parkland will depend on the intensity and mix of uses ultimately approved in the Plan Area as part of any new development. The manner of implementation envisioned through this Plan for parkland and park amenities listed above includes some combination of land dedication/conveyance, construction of park infrastructure, and/or installation of park amenities by private developers, as determined by the Planning Board during the regulatory review process. The complete networks of park(s) and amenities must be designed during sketch plan. The design should prioritize delivering parks during the early phases of the projects’ development. Each property owner within the centrally-located area ~~along or near~~ the future Observation Drive within the Plan Area, must provide a proportional contribution toward new parkland and amenities as part of their development projects.

west of

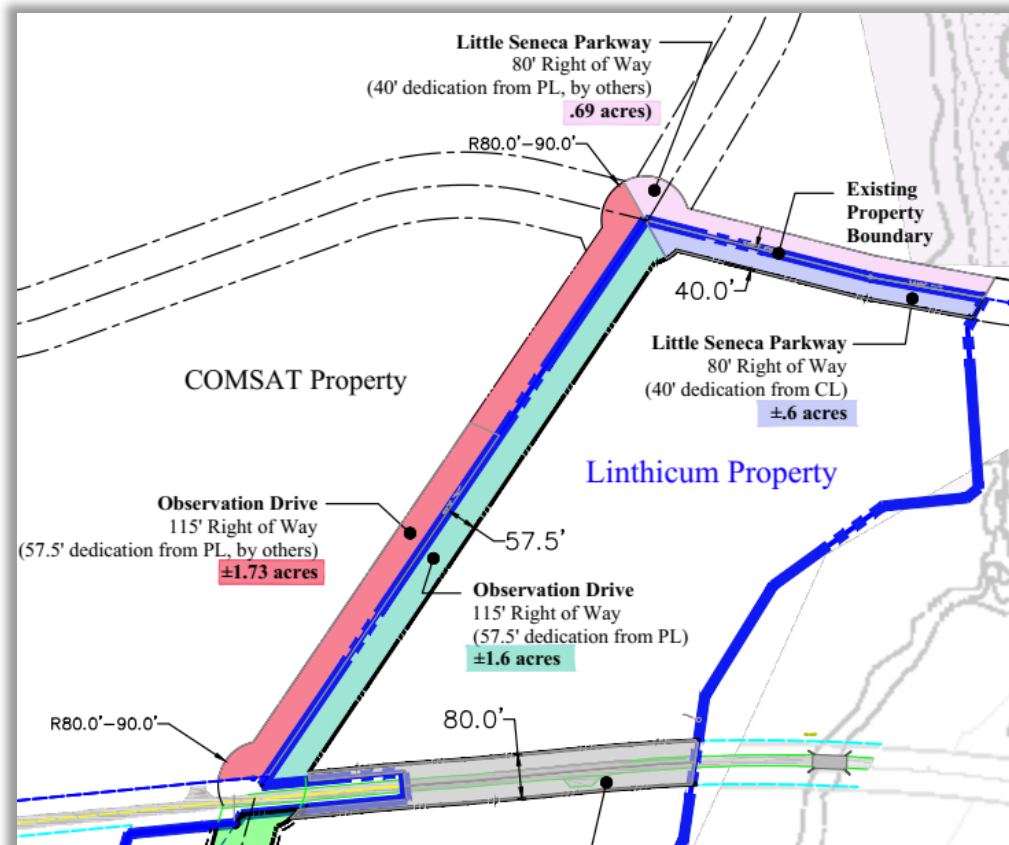
2. Observation Drive Alignment Between West Old Baltimore and Little Seneca Parkway

We reiterate here that we are pleased with Staff's decision to recommend a western realignment of Observation Drive on the Linthicum Property. In response to this realignment, River Falls voiced an objection prior to Work Session #2 on October 23, 2025, that the new alignment between the connections at West Old Baltimore Road and Little Seneca Parkway is inequitable and does not work with the natural topography and existing grade of the two sites. The exhibit below depicts JNP/Avanti's proposal (shown on the left) for addressing these issues and highlights the reality that the River Falls proposal (shown on the right) is deficient for several reasons.

JNP/Avanti Response and Opposition to River Falls Master Plan Roads Exhibit



First, while River Falls purports to seek an equitable division of Observation Drive obligations in its proposal, in reality, it shifts the responsibility almost entirely onto the Linthicum Property, with approximately 0.55 acres of right-of-way dedication on the COMSAT property and 5.75 acres on the Linthicum Property, along the two properties' common boundary line. JNP/Avanti proposes a far more equitable division of right-of-way obligations, consistent with the County's long-established practice and approach relative to the fair distribution of right-of-way dedication between property owners, as depicted below.



Second, the River Falls alignment shifts Observation Drive's connection at West Old Baltimore Road further to the east, which negatively impacts sight lines. JNP/Avanti's proposed alignment, in contrast, puts the West Old Baltimore Road/Observation Drive connection closer to the topographic high point of the area, which helps avoid uphill approaches, optimizes visibility and results in a safer design.

Third, the River Falls proposed alignment incorrectly represents key aspects of Observation Drive and the Linthicum Property. For example, River Falls failed to consider in its proposed alignment the existing cell tower on the Linthicum Property that must be maintained. Also, River Falls appears to have used a wider dimension for Observation Drive on its exhibit than is proposed, exaggerating the land area potentially subject to dedication.

While the previously recommended 115-foot right-of-way for this section of Observation Drive was used to prepare JNP/Avanti's exhibit, the reduced 105-foot right-of-way now being proposed by Staff (which JNP/Avanti supports) will not significantly impact the ability to equitably distribute right-of-way dedication between the properties as shown on the exhibit.

Because the JNP/Avanti proposal is more equitable, better addresses topographical and sight line issues, and more accurately reflects existing site conditions, we request that the Board reject the River Falls Master Plan Exhibit and support Staff's recommendation to share the responsibility for the right-of-way between the COMSAT and Linthicum properties rather than placing it wholly or primarily on one property or another, as shown to be feasible by JNP/Avanti's exhibit.

3. Phasing of the River Falls Proposed Wildlife Underpass

River Falls has also proposed that West Old Baltimore Road between Observation Drive and Lake Ridge Drive be closed to vehicular traffic and re-purposed as a pedestrian and wildlife underpass below I-270. While JNP/Avanti may not object to this idea in theory, the phasing of such a project would be critical. Traffic analysis undertaken by JNP/Avanti to determine the adequacy of roads surrounding the Linthicum Property reveals that closure of that section of West Old Baltimore Road prior to the construction of the I-270 Interchange, the Little Seneca Parkway overpass **and** the completion of Observation Drive Extended would have a negative impact on traffic and connectivity in the area. We request that if the Board chooses to include the potential closure of that segment of West Old Baltimore Road as a future possibility in the Draft Plan, language be included to ensure that such a project cannot be undertaken until such time as the Little Seneca Parkway overpass and the full extent of Observation Drive Extended are complete and operational through both the COMSAT and Linthicum properties.

4. Planted Buffer and Setback Along I-270

The Plan recommends that 50 feet of native tree and landscape buffer be planted or preserved between any new development and I-270. In general, JNP/Avanti agrees with this recommendation. However, with respect to the areas where Observation Drive has been shifted west to be closer to I-270, JNP/Avanti believes the recommendation does not serve the overall goals of the Plan as it requires buffering where there is no principal use to be buffered and unnecessarily impacts developable area.

Requiring the 50-foot buffer in this area would require shifting the alignment of Observation Drive back toward the stream valley to the east. This will not only eliminate a significant number of units that were planned directly adjacent to Observation Drive, but will result in a further loss of units due to a cascading effect on site grading and the planned street grid, caused by the site's topography. The exhibit below depicts the 50-foot buffer and the effect on units.



As is demonstrated above, the 50-foot buffer along the section of Observation Drive nearest I-270 actually eliminates units that are further from I-270 than other units south of Observation Drive that would comply with the 50-foot buffer. To eliminate this inconsistency and remain true to the goals of the Plan, JNP/Avanti proposes that **the buffer in the area of Observation Drive closest to I-270 be reduced to**

25 feet, as this would allow the development of units on the east side of Observation Drive that would otherwise be far enough from I-270.

In addition, JNP/Avanti requests that the Planning Board reduce the setback from I-270 as follows: **1) if I-270 right-of-way width reduced to 300 ft, then 75 feet; or 2) if I-270 right-of-way maintained at 350 ft, then 50 feet.** As was noted in JNP/Avanti's comment letter submitted on October 28, 2025, the 200-foot setback would result in the loss of 150-180 units, or 22-26% of the proposed units on the Linthicum Property. Such a result would serve to undermine one of the most important goals of this Plan, which is to increase housing in the County. A 200-foot setback is unduly burdensome and will substantially decrease the number of units provided by this development – a result that is unnecessary and avoidable in light of the fact that appropriate landscaping and buffering, inclusive of enhanced screening measures, can be provided especially in the area of Observation Drive closest to I-270, to adequately mitigate any adverse impacts. Therefore, JNP/Avanti requests that the Board adopt a setback and buffer area from I-270 as follows: **1) if the I-270 right-of-way width reduced to 300 ft, then 75 feet, or 2) if the I-270 right-of-way maintained at 350 ft, then 50 feet; and in either case, inclusive of the 50-foot landscaped buffer that may be reduced to 25-feet in the area of Observation Drive closest to I-270.**

5. Green Cover Calculation

JNP/Avanti acknowledges the efforts made by Staff prior to Work Session #5 on November 3, 2025, to make the required green cover calculation more reasonable by not including dedicated right-of-way in the calculation. However, JNP/Avanti still believes that the green cover requirement is unnecessarily high in the context of this Plan and the Linthicum Property more particularly.

This Plan area benefits from a significant environmental feature in the Little Seneca stream valley that provides an excellent opportunity for conservation, and development that promotes positive community engagement with the environmental resource. At the same time, this large environmental feature requires substantial buffering that has already significantly reduced what remains in terms of developable area within which to achieve the Plan's other stated goals of increasing opportunities for housing and serving as a major employment center for the County.

In light of the unique environmental context of the Plan area, which should not be overlooked, JNP/Avanti believes that a 35% green cover requirement constitutes overreach and is counter-intuitive to facilitating all that the Plan is seeking to achieve. But more specifically as it relates to the Linthicum Property, it unduly impacts the property's ability to achieve the level of development intended by the CRT Zone being recommended by the Plan and ignores the significant contributions by the Linthicum Property itself to the very green cover that the Plan seeks to protect.

Notably, the original Linthicum tract had extended all the way to and beyond the MCPS elementary school site now located on opposite side of the stream valley. The entire length of the property's eastern boundary abuts the stream valley, a characteristic unlike any other property in the Plan area.

JNP/Avanti fully supports the legacy of the Linthicum Property's contributions to the protection and enhancement of this unique environmental feature of the Plan area, as evidenced by its advocacy to relocate the Observation Drive right-of-way *away* from the stream valley – actually sacrificing developable area. The imposition of a 35% green cover requirement on a property that has already contributed to the preservation of so much green cover unmatched by any other property within the Plan area, defies not only reason but fundamental fairness.

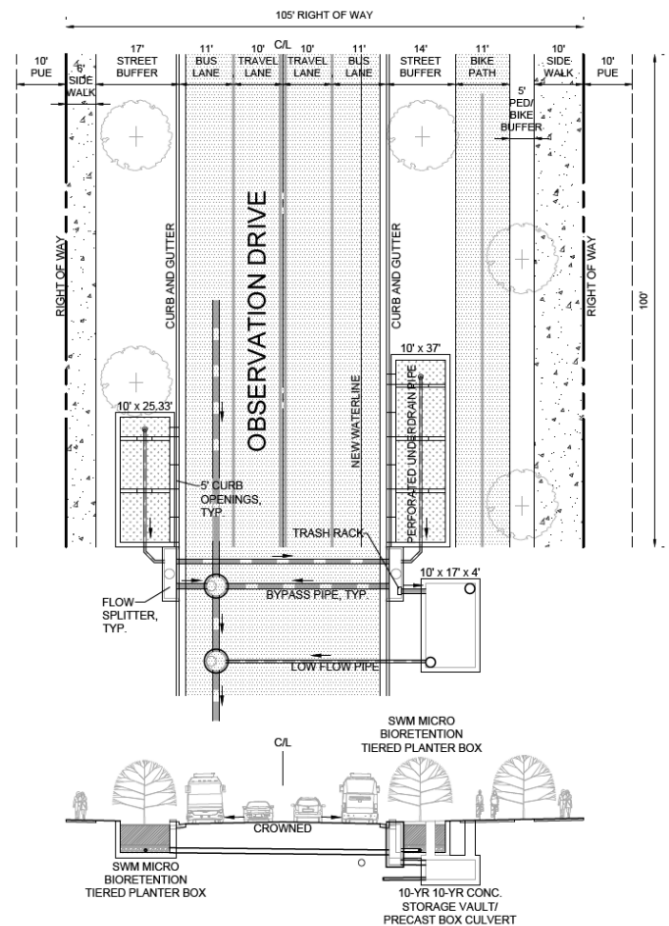
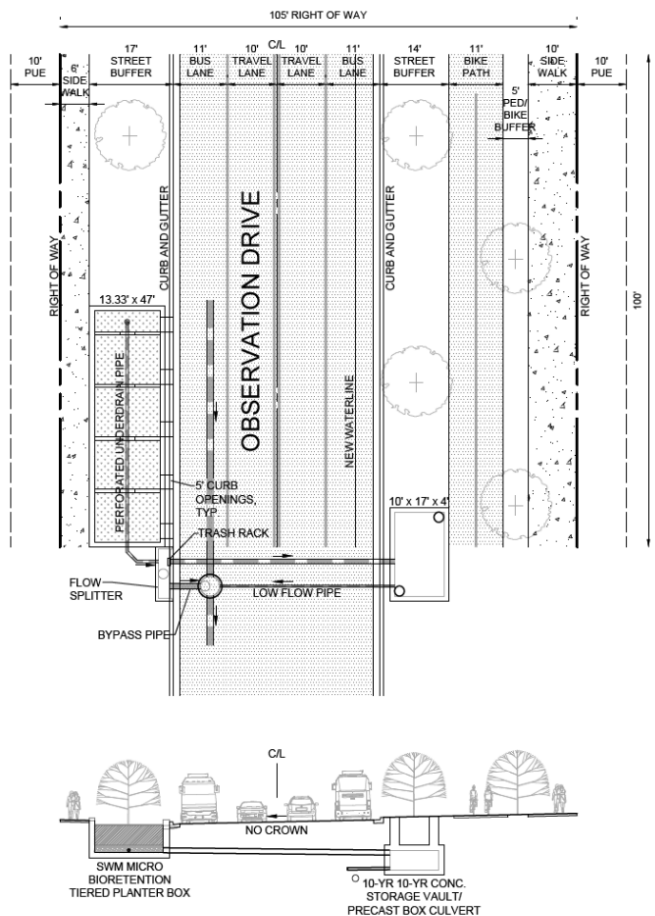
Curiously, Staff has suggested that the 50% tree canopy requirement for surface parking lots which permits alternative compliance options through installation of solar panels, should serve to help facilitate compliance with Staff's recommended 35% green cover requirement. The problem with this suggestion is that it does nothing for the Linthicum Property, as there will be no need for large surface parking areas in the proposed residential community. Therefore, the tree canopy standard cannot be used to justify or argue that Staff's recommended green cover standard is reasonable as it relates to Linthicum – it simply is not.

For the future community envisioned on the Linthicum site, which will be so immediately adjacent and integrated with the stream valley, a *minimum* 25% green cover standard is more than reasonable to achieve an environmentally sustainable residential community. If the Board chooses to keep the 35% requirement, at the very least the definition of features that can be counted as green cover should be broadened to include areas such as **front and back yards of residences**. Without a lower requirement or a broader definition of the features that qualify as green cover, JNP/Avanti fears it will be impossible to deliver the number of residential units proposed on this site, which would negatively impact a major goal of this Plan.

JNP/Avanti respectfully requests that the Planning Board reject Staff's recommended 35% green cover standard and **support a *minimum* 25% green cover standard for the Linthicum site that is inclusive of retained forest cover and any/all planted areas provided by the development, irrespective of whether such areas are made subject to tree protection or forest conservation easement.**

6. Stormwater Management in Proposed Observation Drive Sections

As JNP/Avanti commented at Work Session #2 on October 23, 2025, clarification is needed to ensure that the sections of Observation Drive provided in the Master Plan can achieve both the goals of Complete Streets and adequate stormwater management within the right-of-way. JNP/Avanti's consultants prepared the below modified sections for Staff's consideration that substantially conform to Complete Streets design while providing flexibility to provide adequate stormwater management. The proposed sections provide curb and gutter and fulfill stormwater management requirements within the right-of-way by utilizing micro bioretention tiered planter boxes and underground stormwater vaults within the street tree buffer areas as depicted below.



We appreciate Staff's consideration of JNP/Avanti's modified road sections and inclusion of new language in the Draft Plan that recognizes the need for urban-context stormwater management in the construction of Observation Drive and allows for context-specific sidewalk dimensions. The text proposed by Staff below is acceptable to JNP/Avanti.

Note: This cross-section provides for Complete Street facilities for all travelers along this new north-south street connection within the Sector Plan Area, including future dedicated bus lanes to accommodate the Planned Corridor Connector enhances bus service, an east-side bicycle breezeway, and street buffers. The cross-section provides typical dimensions, and assumes the minimum width needed for urban-context stormwater management. Final dimensions in certain segments may deviate slightly from the typical dimensions to allow for a wider street buffer to accommodate stormwater facilities, bus stations, or other activation opportunities. Additionally, sidewalk width on the west side of Observation Drive may be reduced to 6-feet in segments where the road is in close proximity to I-270 and there is limited land use density.

Thank you for your consideration of these comments. JNP/Avanti greatly appreciates all the work that has gone into developing this Plan and looks forward to working with the County to execute on this new vision for a vibrant and connected Clarksburg.

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: [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 Family comments for Agenda Item 6 - November 20, 2025, Planning Board Meeting re: CGSP Public Hearing Draft
Date: Monday, November 17, 2025 6:42:42 PM
Attachments: [Lett Linthicums to Pl Bd Clarks SP 11-17-25 final.pdf](#)

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

Please find attached a letter submitted on behalf of the Linthicum family with regard to Item 6 on this week's Planning Board agenda, the Clarksburg Gateway Sector Plan. Please disseminate to Planning Board members.

Thank you.

Françoise Carrier



Françoise M. Carrier
Co-Chair, Land Use & Zoning Practice Group
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November 17, 2025

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

Re: Clarksburg Gateway Sector Plan – Linthicum Property

Dear Chair Harris and Members of the Board:

I write on behalf of the owner of the Linthicum Property discussed in the Public Hearing Draft of the Clarksburg Gateway Sector Plan (the “Plan”), Linthicum Properties Management LLC (“LPM”), represented in these proceedings by Tom Linthicum and Paula Linthicum. The Linthicums wish to thank staff and the Planning Board for your care and effort in crafting a Plan that will guide the next 20 years of development in Clarksburg.

The Linthicums support the comments and proposed changes put forward in a letter to the Planning Board dated November 16, 2025, from the contract buyer and developer of the Linthicum Property, JNP/Avanti. The Linthicums also appreciate many of the current recommendations from planning staff, including sharing responsibility between the Linthicum Property and the former COMSAT property for the dedication of Observation Drive right-of-way just north of West Old Baltimore Road and additional flexibility with regard to Observation Drive cross-sections.

The Linthicums support JNP/Avanti’s suggested changes to the Plan’s recommendations for Constellation Park. The Working Draft of the Plan recommended a significant park on the former COMSAT property, recognizing its prominence as by far the largest property in the Sector Plan area and the most centrally located. It is entirely at the Planning Board’s discretion to recommend the amount and makeup of parkland it finds appropriate for the COMSAT property, but any reduction in the parkland recommended on the COMSAT property should not come at the expense of other Clarksburg property owners and developers such as the Linthicums and JNP/Avanti, which already has a plan to provide adequate open space and park amenities in a manner best suited to the layout of the Linthicum Property.

Based on long experience with the important role West Old Baltimore Road plays as a transportation connection between Clarksburg and other parts of the County, the Linthicums are skeptical about River Falls’ proposal to close part of West Old Baltimore Road and route traffic into a detour through the former COMSAT site. They agree with JNP/Avanti’s suggestion that this closure could be seriously considered as a Plan recommendation only if its construction were pushed to a time *after* the Little Seneca overpass and the full Observation Drive Extended are complete and operational through both the Linthicum and COMSAT properties.

The Linthicums have a particular concern about staff recommendations for significant forested buffers and residential setbacks along I-270, as well as staff's recommended 35% green cover within the developed portion of all properties in the plan area, excluding environmental buffers and forest conservation areas. These recommendations fail to recognize that the Linthicum Property is unique in the plan area in its relationship to environmental buffers and forest conservation areas. The Linthicum family originally owned hundreds of acres of farmland in Clarksburg. The farm was divided and reduced in size by a considerable taking for I-270, and the Linthicums later dedicated approximately 72 acres of land for public parkland. This covered all of the Little Seneca Creek stream valley that abuts the entire eastern and southern boundaries of the present-day Linthicum Property, plus sufficient land outside the stream valley to accommodate trails through the Master Planned Clarksburg Greenway.

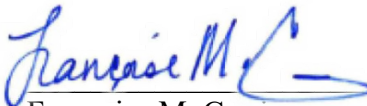
The Linthicums perceive a fundamental unfairness in recommendations that keep reducing the amount of usable acreage on their property by requiring a large dedication, forested buffer and residential setback from I-270 – in essence, expanding the amount of land taken for I-270, but this time without compensation – and imposing a 35% green cover requirement that excludes forest conservation and environmental buffers. This green cover requirement is simply overreach on a property where residential development will benefit dramatically from abutting on two sides the land that the Linthicums previously dedicated as part of the Little Seneca Stream Valley Park. JNP/Avanti has designed its concept plan to take full advantage of the stream valley as an integral part of the new community. It is neither sensible nor fair to limit the number of homes that can be built on this last piece of the Linthicum farm by requiring the same percentage of internal green area for this site as for other properties that do not have the benefit of abutting a beautiful stream valley park along two sides. The interior green requirement on this property should be set at 25%, as suggested by JNP/Avanti.

For all of these reasons, LPM and the Linthicum family support the positions adopted by JNP/Avanti with regard to the staff's recommendations for minimum green area, residential setback from I-270, and forest buffer along I-270.

Thank you for your consideration. 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
Charles T. (Tom) Linthicum
Paula Linthicum
Soo Lee-Cho, Esq.

From: [Bob Elliott](#)
To: [MCP-Chair](#); [Harris, Artie](#); [Coello, Catherine](#); [Bartley, Shawn](#); [Pedoeem, Mitra](#); [Linden, Josh](#); [Hedrick, James](#)
Cc: [Mike Alexander](#); gunterberg@rodgers.com; [Casey Blair Anderson \(canderson@rodgers.com\)](mailto:Casey.Blair.Anderson@rodgers.com); will.zeid@kimley-horn.com; [Butler, Patrick](#); [Larson, Clark](#); [Zeigler, Donnell](#); [Robins, Steven A.](#); [Sartori, Jason](#); [Kronenberg, Robert](#); [Montgomery County, MD Councilmember Marilyn Balcombe](#); [Figueredo, Miti](#); [Ballo, Rebecca](#); [Liebertz, John](#); [Murnen, Lily](#); [Coppola, Henry](#)
Subject: Clarksburg Gateway Sector Plan - Work Session #6 - River Falls Comments
Date: Tuesday, November 18, 2025 3:56:03 PM
Attachments: [image001.png](#)
[CGSP Work Session 6 - River Falls Consolidated Comment Letter 11 18 2025.pdf](#)

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

Dear Chair Harris and Members of the Planning Board,

Attached please find a letter from River Falls Investments LLC which contains the remaining matters that we believe are most important for the Planning Board's to consider during Work Session #6 for the Clarksburg Gateway Sector Plan. These include:

- List of River Falls Priority Items
- Forestry and Green Cover Recommendations / Comparison(s)
- I-270 Buffer Narrative and Section
- Comsat Neighborhood Recommendations – Summary and Markup

We greatly appreciate your ongoing consideration of our concerns. We will attend the work session and be available to discuss any of the attached items or answer questions. As you will see, there are many outstanding items, and the issues are quite complex. We look forward to working with you and Staff to finalize the Clarksburg Gateway Sector Plan.

Thank you,

Bob

Effective August 29, 2025, Lantian Development is now River Falls.



Bob Elliott

CHIEF EXECUTIVE OFFICER, RIVER FALLS

 belliott@riverfalls.com

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November 18, 2025

By Electronic Mail

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

Re: *Clarksburg Gateway Sector Plan – Work Session #6*

Dear Chair Harris and Members of the Planning Board,

River Falls appreciates the Planning Board's continued attention to the Clarksburg Gateway Sector Plan and the significant effort invested by both the Board and Planning Department Staff throughout this process. We recognize the volume of public testimony, the complexity of the issues and the many competing priorities the Board must balance.

We also want to expressly thank the Board and Staff for several important modifications already made to the Public Hearing Draft. In particular, we appreciate the decisions to:

- Recommend against designating the former COMSAT headquarters building as historic,
- Retain the possibility for a future Exit 17 interchange to provide direct access to I-270, and
- Adopt the "Constellation Park" framework for integrating recreational and park amenities across the broader Sector Plan area rather than reserving a single large block of land.

While these changes materially improve the feasibility and flexibility of future development and reflect a thoughtful response to input from interested members of the public, a handful of critical issues remain to be resolved.

With regard to Green Cover and Environmental requirements, Staff has included several modifications that recognize the need for flexibility and balance, but several core questions remain unsettled:

- How much green cover will be required?
- Over what areas will the calculation apply?
- Which types of green cover will count toward the requirement?



These answers to these questions form the structural basis for this plan and will determine whether its housing, economic development, and environmental goals can be achieved. To be frank, the Staff's proposed approach is extremely confusing and unnecessarily complicated. We have struggled to understand the imaginative, but undefined terms of "Buildable Area" and "Developable Area" and what is, or is not, included in certain calculations related to both.

River Falls believes that a simple 35% green cover requirement will ensure that the developed area within the plan's boundaries includes ample tree canopy and vegetation, even with the inclusion of existing forest along with trees planted in the stream valley buffer east of Observation Drive. For your consideration, River Falls has attached a more detailed comparison of the two different approaches, as well as one potential scenario to illustrate that this straightforward and flexible approach still delivers balanced green cover across the entire site with forest cover accessible to the vast majority of new residents in a 10-minute walkshed.

Further, we are deeply concerned that Staff's recommendations for the I-270 buffer remain vague or unintentionally expansive. For example, in Staff's Option 1, as drafted, should we wish to develop townhouses along I-270, after the 50' tree buffer, we would still need to set back an additional 150', rendering another 14.4 acres of our land effectively unusable for residential development.

Instead of the sweeping setbacks proposed by Staff, River Falls asks the Board to endorse a sound wall paired with a 50-foot forest buffer for residential building types along I-270. For reference, we have included the related drawing and narrative we included in Work Session #3. This approach provides strong environmental and noise-mitigation benefits. We request that our 50-foot forest buffer standard be adopted in lieu of "Option 1" in Staff's memo.

River Falls also asks the Board to address the remaining items on our priority checklist, which is included with this letter. In particular, the Neighborhood Recommendations for the Comsat site have not been reviewed in totality despite the significant revisions made elsewhere in the Draft Plan. We have provided a redlined version with our proposed modifications. These changes are essential to keeping the plan flexible, internally consistent, and aligned with the development patterns and building types that are actually feasible in this area.

It is our understanding that after Worksession #6, Staff will prepare the Planning Board's Final Draft Sector Plan for transmittal to the Council. We request that the Board schedule a follow-up agenda item once the full draft is complete to confirm that it accurately reflects the many revisions and direction the Board has provided across the six work sessions.



River Falls remains committed to working collaboratively with the Board and staff to achieve a balanced, workable, and forward-looking plan for the Clarksburg Gateway area. We appreciate your consideration.

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
Rebecca Ballo
John Liebertz

River Falls Priority Changes to Draft Sector Plan

Green Cover/Tree Canopy (Environmental #10 and #4)

- Replace Staff's complex and confusing approach with a straightforward standard: 35% green cover on the total property or development site, calculated on the gross site area and including street trees, existing forest, parks, etc., without arbitrary exclusions.
- Remove the proposed 50% tree-canopy requirement for surface parking lots. It is untested, adds expense and space to parking areas, and far exceeds the CR Zone standard.

I-270 Setback (Land Use #3)

Replace Staff's 200-foot setback with a practical standard that goes well beyond current rules: Construct a soundwall with 50-foot forest buffer where lower-scale residential fronts I-270.

Interchange Option (Transportation #6d)

Adopt Option B to retain the I-270/Little Seneca interchange option. This is essential to attracting significant commercial tenants and making the COMSAT site competitive.

Flexibility and Neighborhood Recommendations (Introduction and Comsat Neighborhood)

- Include a statement in the introduction calling for flexibility in applying recommendations throughout the Plan, particularly for environmental and street section provisions
- Revise Comsat neighborhood recommendations for consistency with other Board actions

Observation Drive Alignment (Comsat Neighborhood #8)

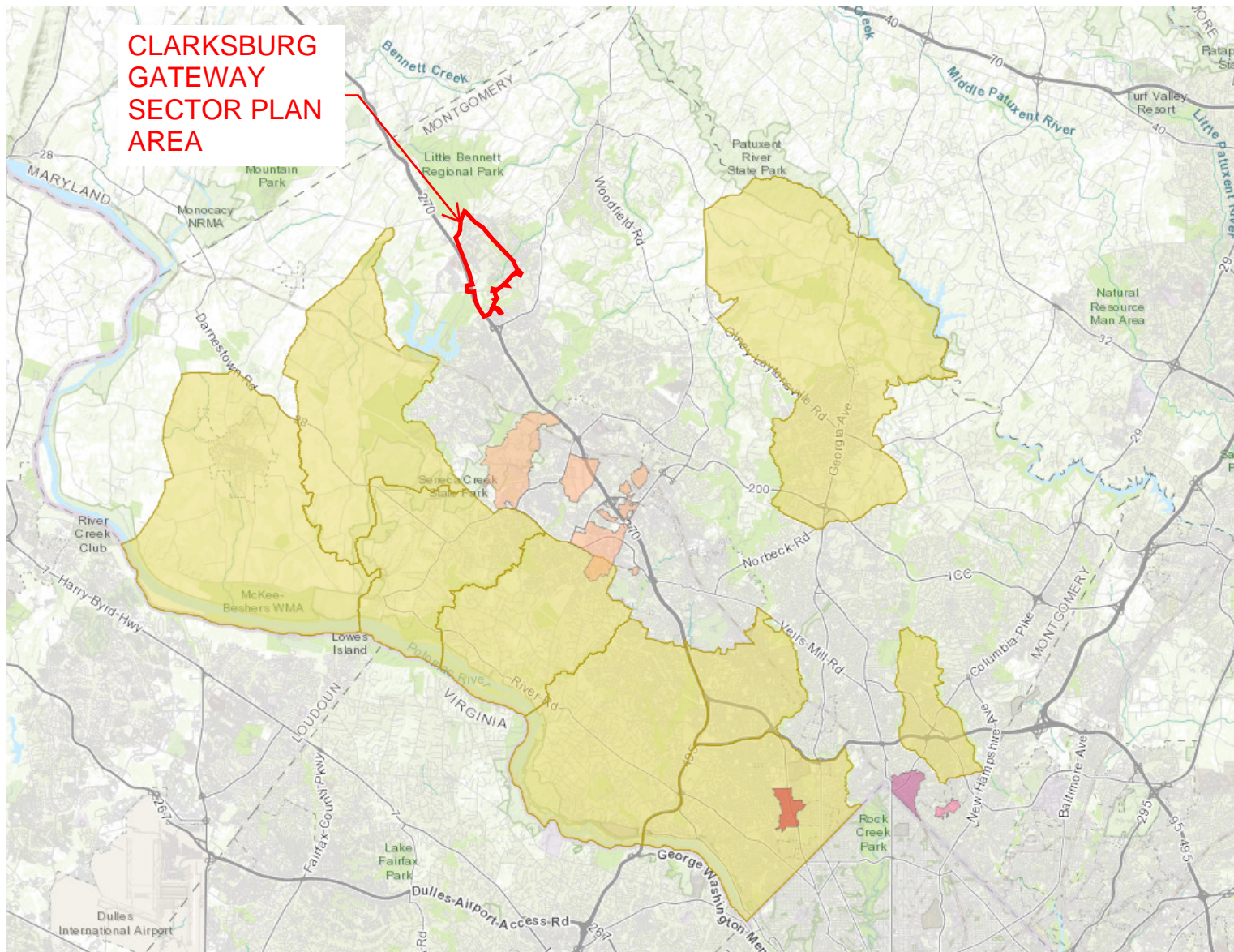
Revise the alignment to follow the River Falls proposal, which distributes ROW impacts more equitably, reduces grading and engineering complications, and saves more existing trees. River Falls has lost significant developable acreage to accommodate the realignment with Gateway Center Drive which removed Observation Drive from the Stream Valley.

Recreation/Aquatic Center Siting (Community Facilities #9, Recreation Facilities #19)

Revise the language to state that the County should "consider co-locating a community recreation and/or aquatic center" in the Plan Area and coordinate with appropriate agencies during development review – do not pre-designate the COMSAT site.

MPDU Requirement (Housing #1)

Limit the MPDU increase to 15% only for projects using the Optional Method in CR/CRT zones. Do not apply it to standard-method projects where it would undermine feasibility. See attached exhibit for current applicability. River Falls recognizes the importance of affordable housing but feels that this represents an arbitrary ratcheting up over the prior 12.5% standard.



Planning Department Issues Digital Map to Show Areas Where Increased Percentage of Moderately Priced Dwelling Units Will Be Mandatory -

Requiring 15 percent MPDUs in planning areas in which at least 45 percent of the United States Census tracts have a median household income of at least 150 percent of the countywide median household income at the time of submission of a completed development application.

Source: Montgomery County GIS - 15% MPDU Requirement

COMSAT PROPERTY
RIVER FALLS INVESTMENTS LLC.

15% MPDU REQUIREMENT
RODGERS
CONSULTING

Forestry and Green Cover Recommendations

The Planning Board has expressed support for revising the draft forest and green cover language to avoid undermining the Plan's housing and economic goals. That's the right direction, but Staff's proposed approach still introduces unnecessary complexity, vague new concepts, and hidden constraints that will reduce development potential without clear benefits to environmental performance or the livability of the plan area.

County and State law already establish multiple layers of environmental protection: the Forest Conservation Law, SPA requirements, and urban forest standards. Any new requirements must be tied to the specific needs of this plan area – not a desire to “raise the bar,” replicate the requirements imposed in prior plans, or micromanage site design. If this plan is different than other areas the Board has considered recently, it differs in ways that warrant more, not less, flexibility in the application of green cover and forest canopy requirements.

Staff's justification for tighter standards - particularly that counting forest within the stream valley buffer (SVB) would leave insufficient canopy elsewhere to mitigate heat or maintain site quality - is incorrect. A comparison of the following options illustrates why:

Option 1: Keep It Simple – 35% of Gross Site

- Apply a 35% green-cover standard to the entire gross site.
- Count all green elements: forests, SVB, open space, landscaped areas, street trees (including trees in the right-of-way), parks (public and private), and green roofs.
- Apply a 35% shade target for surface parking lots where feasible.
- This approach avoids arbitrary distinctions between buildable and non-buildable areas on properties where all development will feature green cover and proximity to forests.

COMSAT Example

- Gross site: 203.8 acres \times 35% = 71.3 acres green cover
- SVB/open space east of Observation Drive: 41.3 acres
- Resulting green cover west of Observation Drive: about 30 acres
- This approach is balanced, achievable, and consistent with how sites are actually designed.
- It incentivizes property owners to save existing forest west of Observation Drive and plant as much forest between I-270 and any new development as possible.
- A simple 35% requirement provides needed flexibility for larger properties. The 200-acre Comsat property will be developed in phases over a 10-20 year period, with shifting market conditions for commercial, residential and retail uses. Providing flexibility and certainty upfront is a key to long-term success.

Option 2: Staff Draft's 35 Percent Plus, Minus, and ???

Staff replaces a clear, predictable standard with a new and unclear formula tied to "total developed area" excluding dedications, buffers, and conservation areas. Staff also uses the term "total buildable area" which is confusingly connected to "total developed area" which will be "determined by net tract area," but then excludes some areas that meet the definition of "net tract area." For example, land placed in a forest conservation easement is included in net tract area, yet Staff says these easements should not count toward meeting green cover requirements. Moreover, land dedicated as a park is not part of the net tract area, but parks provide space for trees and vegetation. Why should street trees count as green cover while parks interspersed in developed areas or new trees placed in a forest easement are excluded?

Comparison

River Falls has struggled to interpret and apply the Staff's proposed rules for green cover on the Comsat site. Even under the least restrictive interpretation, the site would need 26.3–38.5 additional acres of green cover outside the stream valley buffer. This is not dramatically different from what would be required under the 35% gross tract approach we support, but the Staff's method adds unnecessary complexity by selectively including and excluding certain green cover categories.

The confusion deepens with Staff's claim that the site's "buildable area" is 137.7 acres, or 43 acres more than their previous estimate of 94.3 acres. Applying 35% green cover to 137.7 acres equals 48.2 acres, which would be in addition to 41.3 acres in the stream valley buffer, 4.5 acres for the I-270 buffer, and 5 acres in the northern forest stand, all of which are excluded from green cover under Staff's rules. This leaves only 89.3 acres of buildable land if their approach is adopted.

In total, this interpretation could require over 102 acres of green or forest cover, or more than half the site. That is unrealistic and inconsistent with the plan's development goals, representing a loss of 300–720 housing units or hundreds of millions in long-term tax revenue from commercial tenants.

River Falls can meet green cover goals if allowed to count the 50-foot I-270 buffer, existing upland forests, and plantings in rights-of-way, parks, and the stream valley buffer. The gross tract approach achieves this cleanly and consistently, while Staff's restrictions introduce complexity, reduce flexibility, and invite disputes during development review.

Why the Great Seneca Plan Should Not Be Viewed as a Precedent

Staff repeatedly cites the Great Seneca Plan. The comparison doesn't hold:

- Great Seneca's 35% requirement applies only to four of its eight disjointed areas, all of which are already developed.
- Many large sites (e.g. Adventist Healthcare) already have ample green cover that will not constrain redevelopment. Forest conservation areas there are largely remnants of prior approvals – not new exclusions that distort site planning.
- Development opportunities in the Great Seneca are largely institutional and mid-rise residential, with construction types that can support green roofs and structured parking.

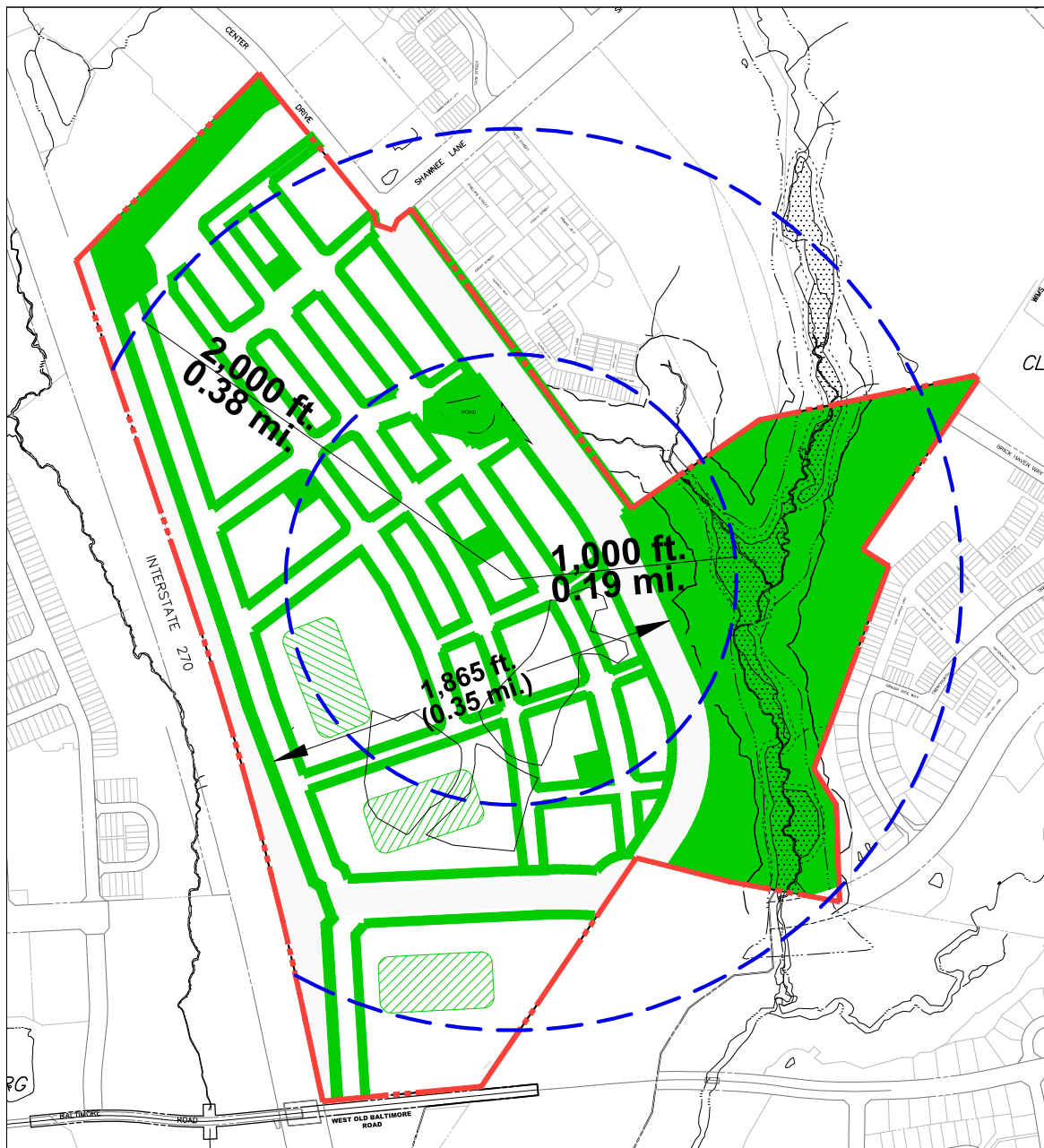
By contrast:

- Clarksburg Gateway is largely undeveloped and expected to deliver horizontal, stick-built housing and employment space.
- Stick-built construction cannot support extensive green roofs, and development efficiency is critical to meeting housing and economic goals.
- Great Seneca's standard has never been implemented; no post-adoption approvals have tested it, and the same is true for the 2021 Shady Grove Minor Plan language.
- Relying on unproven precedents for the Clarksburg Gateway Plan area with completely different building typologies is a recipe for failure.

Why the Briggs Chaney 50% Parking Lot Canopy Example Is Inapplicable

Staff points to the Briggs Chaney "Montgomery Auto Sales" approval as evidence that 50% canopy is achievable, but:

- The project has not actually been built.
- Its parking area achieves 37% shade from trees; an additional 13% comes from reflective surfaces and landscaping, not tree canopy.
- The site is 3-4 acres, with a circular perimeter that artificially inflates available planting area because of its irregular shape.
- A 50% canopy requirement – double the CR Zone standard – is economically and physically unrealistic for large UpCounty sites where surface parking is unavoidable.



--- COMSAT PROPERTY
203.8 AC± TOTAL

41.3AC± (20.3%±) EAST GREEN COVER

30.0 AC± (14.7%±) WEST GREEN COVER

71.3 AC± (35%±) TOTAL

**203.8 AC x 35% =
71.3 AC GREEN COVER**

NOTE: THIS DIAGRAM IS FOR ILLUSTRATIVE PURPOSES ONLY AND IS ONE OF SEVERAL PLAUSIBLE MIX OF USES THAT CAN BE OBTAINED.

— COUNTY REGULATIONS ALREADY REQUIRE STREET TREES AND LANDSCAPING IN ANY LARGE DEVELOPMENT. AS A RESULT, TREES AND OTHER GREEN COVER WILL BE SPREAD THROUGHOUT THE DEVELOPED PORTIONS OF THE SITE. THE IMAGE IS MEANT TO ILLUSTRATE THE OVERALL PROPORTION OF GREEN COVER WITHIN DEVELOPED AREAS, NOT TO MAP ITS PRECISE LOCATIONS.

▨ POSSIBLE SURFACE PARKING LOT WITH 35% GREEN COVER.

1,000' = 5 MIN WALK

2,000' = 10 MIN WALK

FIGURE 6: RECOMMENDED LAND USE

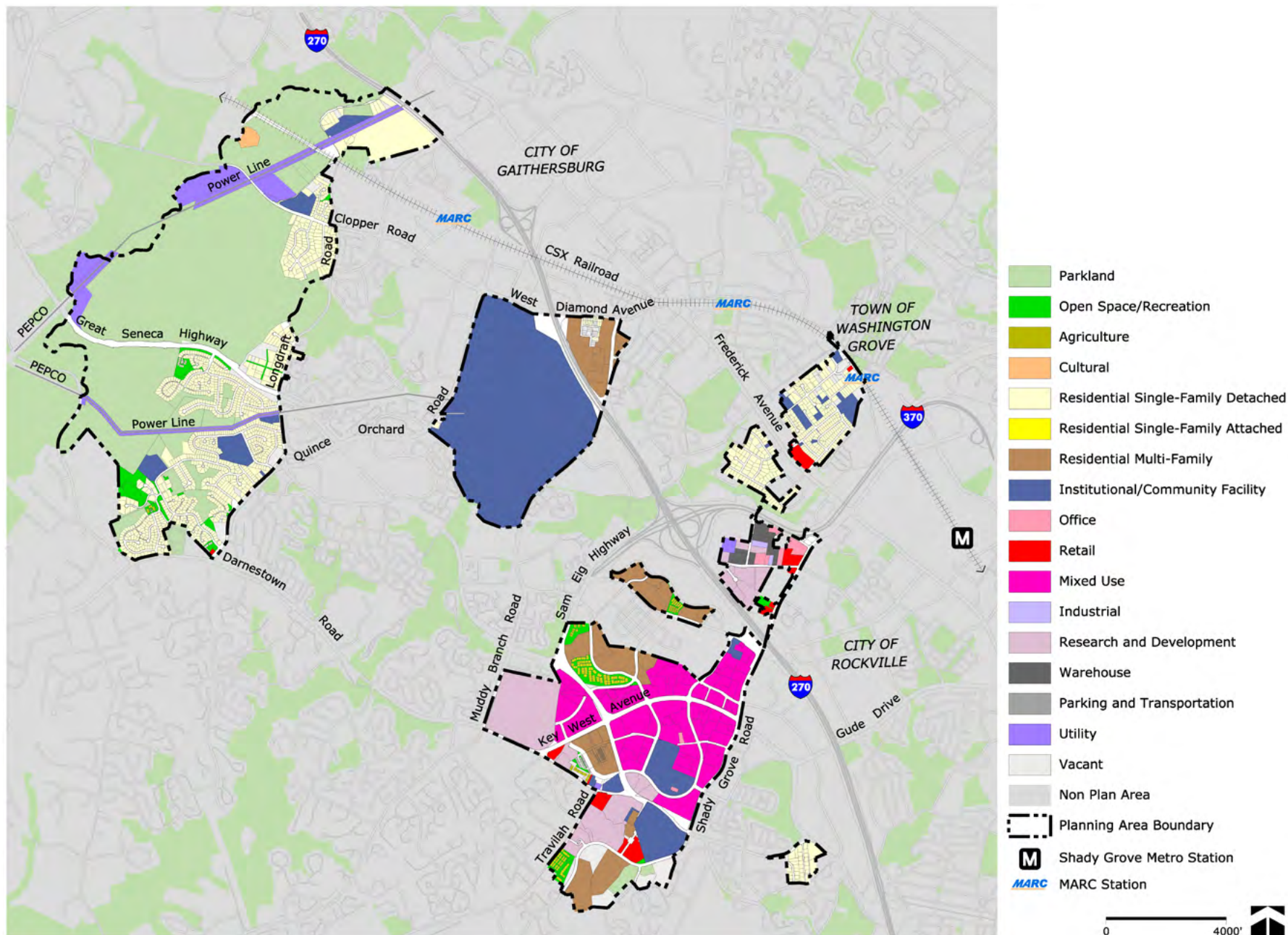
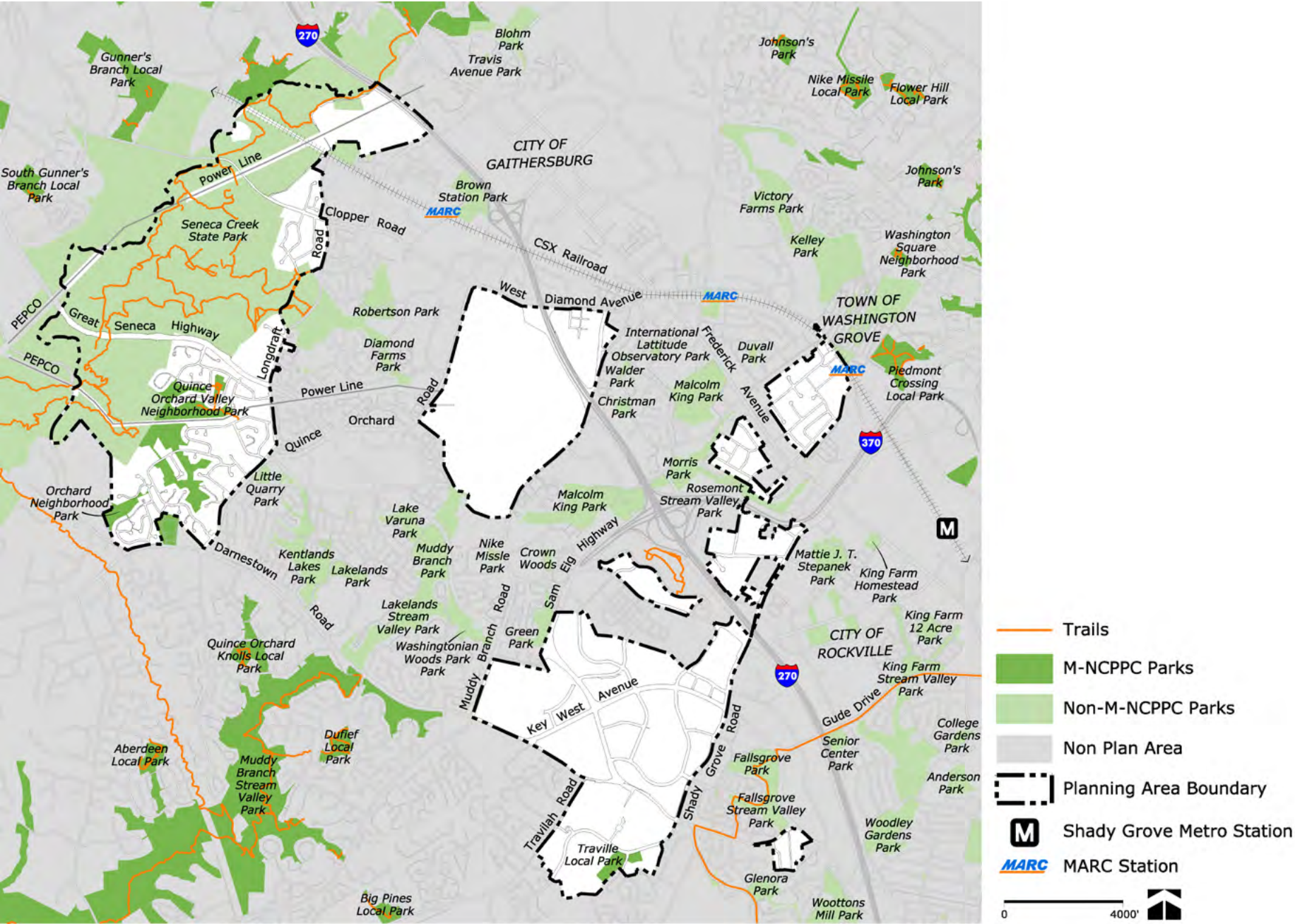
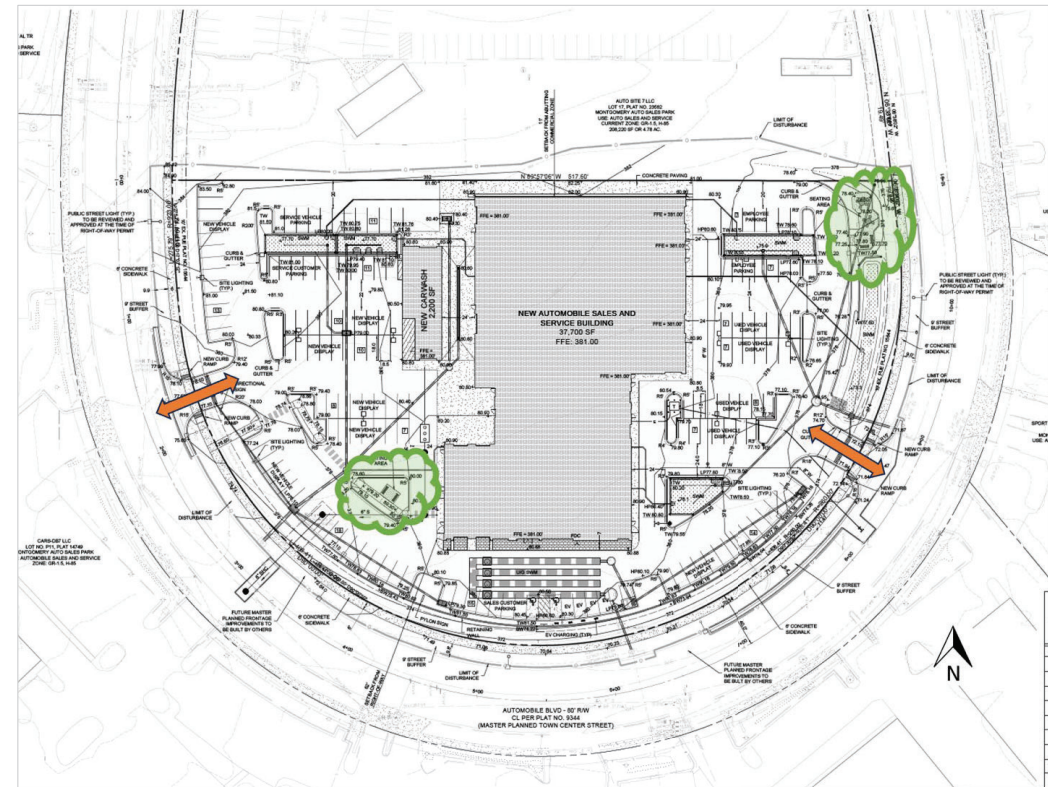


FIGURE 12: EXISTING AND PROPOSED PARKS AND TRAILS



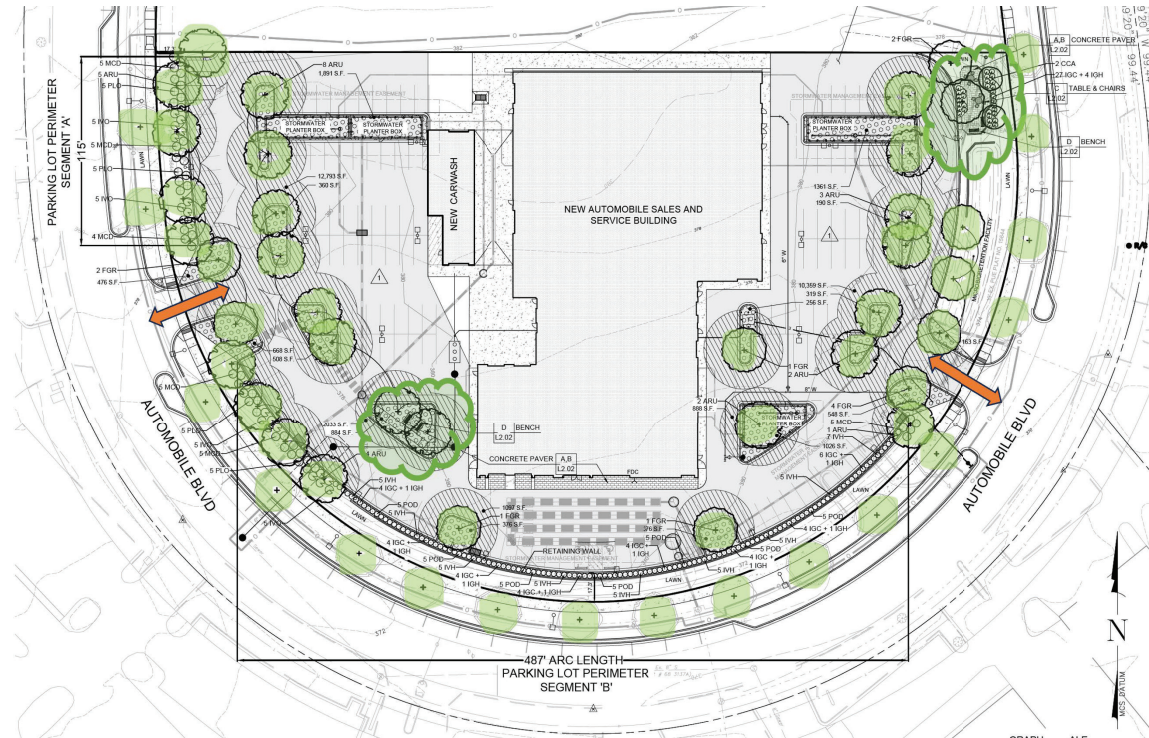
Site Plan Amendment

- 39,900 SF auto sales and service building, outside display, accessory car wash
- Two open spaces for employees and customers

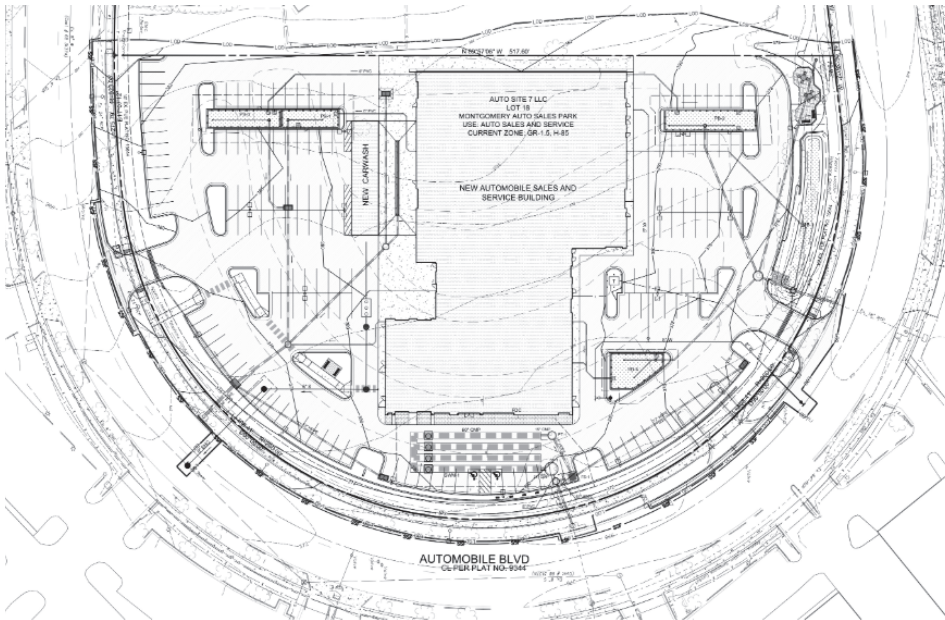


Landscape Plan

- 50% parking lot shade coverage and “cooling” surfaces
 - 37% shade (25% min)
 - 12% landscaped islands (5% min)
 - 1% high-albedo concrete paving
- 13.9% Green Area (10% min)
- 2 activated open spaces
 - Tables, chairs, benches, pavers



Forest Conservation Plan (Lot 18)



- Meets Chapter 22A and Environmental Guidelines
- No existing forest or environmentally sensitive areas
- Afforestation requirement (0.59 acres) offsite forest bank or a fee-in-lieu payment to the Forest Conservation Fund, if no forest banks are available

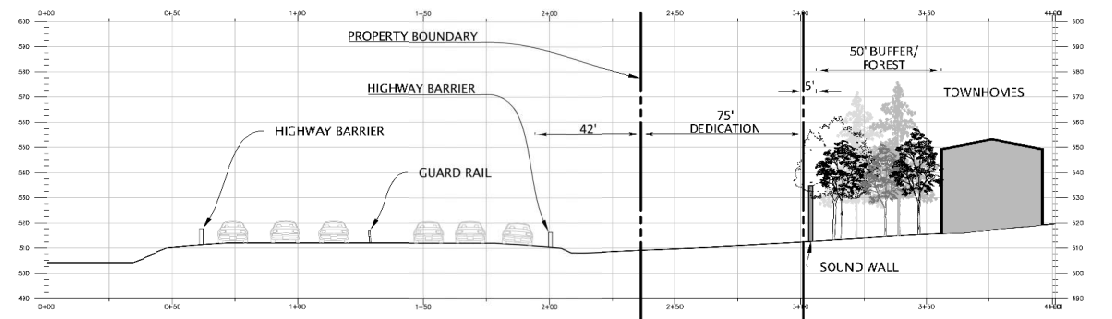


REPLACE IN ITS ENTIRETY ALL OF THE LANGUAGE in Land Use Recommendation #3 (Page 31) with the following:

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.

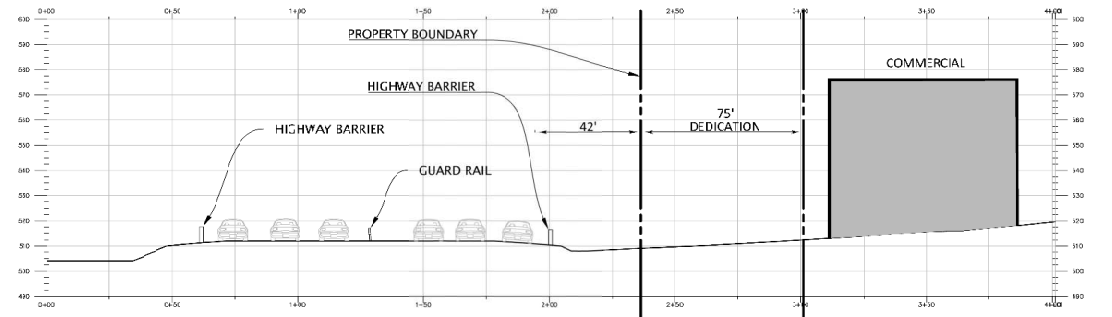
River Falls Rationale:

- 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.



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, Wisconsin 431 Montgomery Avenue Bethesda, MD 20814 Contact: Mr. Bob Elliott

SECTIONS
10/23/2025



	BY	DATE
BASE DATA		
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REVIEWED		
RODGERS CONTACT		
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COMSAT

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

SCALE:	1"=120'
JOB No.	1193AJ
DATE:	OCT 2023
SHEET No.	

Comsat Neighborhood Recommendations

The Planning Board has not yet considered the staff draft's recommendations for the Comsat neighborhood, including guidance on urban design and the plan's expectations for how the Comsat site will be developed.

The attached redline would make the section more pragmatic, market-responsive, and implementation-focused, prioritizing flexibility, connectivity, and integration of employment, housing, parks, and transit over prescriptive land-use formulas.

They may be summarized as follows:

Clarify development flexibility

- Emphasizes flexibility in how the property develops, whether as a major employment campus, a residential neighborhood, or a mix of both, rather than presuming a specific development program.
- Explicitly acknowledge that surface parking is an appropriate interim condition in phased mixed-use development aligned with long-term Thrive 2050 goals.

Support for interchange and infrastructure

- In light of the Planning Board's decision to retain the option for an interchange at Exit 17, the redline acknowledges the interchange's potential importance to achieving the site's employment, housing, retail, park, and transit goals.
- Calls for any interchange design to improve access and connectivity in a "context-sensitive" manner.

Balance employment and housing

- Refines the recommendation for a mix of residential and employment uses, stressing compatibility and market flexibility.
- Adds examples of appropriate uses - life sciences, biotech, R&D, and offices – to avoid locking the site into a single set of assumptions.

Guide urban design and building placement

- Refines guidance on the activity center, promoting active street fronts, varied building heights, and slower traffic speeds in a pedestrian-oriented public realm while retaining flexibility in site and street design.
- Avoids requiring a curbless "main street" or "Street A" while retaining the recommended location of the activity center.

Identify activity center location and function

- Clarifies that the mixed-use activity center should be concentrated near the Observation Drive and Little Seneca Parkway intersection, adjacent to the planned enhanced bus station.
- Encourages clustering of employment uses close to the mixed-use zone to reinforce transit accessibility and critical mass.

Explain streets and connectivity

- Recommends a connected grid of public streets coordinated with the Linthicum property and establishes expectations to guide the final alignment for Observation Drive Extended along the shared boundary.
- Emphasizes public streets with sidewalks, street trees, and on-street parking, with rear-loaded or alley-accessed parking where feasible.

Tie together parks, open space, and the public realm

- Integrates the Constellation Park concept more explicitly, linking it to the broader Clarksburg park and trail system.
- Strengthens guidance for accessible, interconnected parkland using trails and sidewalks along major corridors.

Provide flexibility to meet environmental goals

- Retains language on open space preservation to favor retaining topography, mature trees, and forest stands “where feasible” but removes reference to preservation of specific trees to ensure environmental recommendations do not preclude development consistent with plan goals.

B. COMSAT NEIGHBORHOOD

The Sector Plan anticipates a range of new development types on the former COMSAT Laboratories property. ~~It could develop as a major Upcounty employment campus, or with~~, with a portion of the property occupied primarily by residential uses. ~~It may be possible to have both along with a~~ and a portion occupied by a compact, mixed-use activity center with a variety of residential, commercial, retail, and recreational uses. The location and configuration of these development types is flexible, yet the activity center should be established in proximity to a planned enhanced bus transit station along Observation Drive Extended.

As one of the last remaining large, undeveloped sites along the I-270 corridor in Montgomery County, the approximately 200-acre COMSAT property could attract a major institutional or commercial tenant(s), such as a life sciences company, research and development facility, or corporate headquarters. Should such a tenant express interest in this location, this plan should supports the possibility of an interchange along with the this type of development in a mixed-use format along with of employment, housing, retail, amenities, parks and public spaces, and transit, integrated with surrounding communities in a context-sensitive manner, which may include surface parked development typologies on an interim basis and in a manner that is consistent with the longer term goals of Thrive Montgomery 2050.

Development and public improvements in this neighborhood should implement the following recommendations:

1. New residential development should consider establish a mix of housing types and densities throughout the neighborhood.
2. Employment uses, neighborhood-serving shopping, dining, or personal services that serve existing and future residents should be ~~Small-scale commercial space(s) is~~ encouraged as part of new residential development. ~~to provide for neighborhood-serving shopping, dining, or personal services that serve existing and future residents.~~
3. New development is encouraged to establish a ~~compact~~, mixed-use activity center including, with ~~multiple uses and building densities. H~~ housing, shopping, employment, entertainment. ~~C, and~~ cultural opportunities are recommended, along with ~~ample~~ open space and other recreation amenities. The Plan also supports life sciences, biotech, research and development, and other corporate opportunities on the property as either a campus or mixed-use development.
4. To the extent "taller buildings" are developed consider placement ~~should be concentrated~~ along the I-270 western frontage of the property to help provide a sound and visual buffer from the highway to buffer any lower-scale residential uses to the east.
5. Any future mixed use activity center should incorporate a variety of different ~~As part of new development in a new activity center,~~ street typologies consistent with the Complete Streets guidelines so as to allow for incorporate the master planned 'main street' or "Street A" as a Commercial Shared Street designed for safe and comfortable pedestrian activity and slower vehicle speeds. This street type should be applied where a concentration of commercial retail uses is proposed. (See also Transportation recommendations.)
6. Within the mixed use activity center, To help establish an active and attractive pedestrian realm along the planned central 'main street,' buildings should be oriented to create a public realm with buildings to front onto the 'main street,' with active store fronts and building entries, enhanced streetscapes varying,

~~and higher building heights. Consider concentrating density in areas closer to the activity center. and densities than other streets in the neighborhood. Development patterns should be in a - context-sensitive manner and may include surface parked development typologies on an interim basis until other low-to-medium vertically stacked mixed use typologies are economically viable.~~

7. ~~The mixed use activity center should be c~~Concentrated near the ~~-commercial uses along the planned 'main street' and near the~~ intersection of Observation Drive extension with Little Seneca Parkway, in proximity to the planned enhanced bus station. Consider concentrating employment uses in close proximity to the, ~~either as part of stand-alone or mixed-use activity zone. development.~~
8. Proposed development on the former COMSAT Laboratories property should establish compatible development blocks and a connected grid of public streets with the adjacent Linthicum Family property. The alignment of Observation Drive Extended should be established generally along the property line of these properties on the Linthicum property, between Little Seneca Parkway Extended and West Old Baltimore Road.
9. To the greatest extent possible, n~~New~~ local streets proposed in this neighborhood should be public streets that provide for sidewalks, street trees and on-street parking, with a preference for rear-loaded parking for new attached and multi-unit development, accessed from secondary service alleys, where feasible.
10. Along with all other properties in the 969-acre Sector Plan, utilize the Constellation Park Concept within the Comsat Neighborhood to support and ~~Locate a new Clarksburg Gateway Local Park in this neighborhood to~~ serve the wider Clarksburg community. H and help realize the broader vision and goals of the Plan and its specific goals for parks, open spaces, and recreation. Parks should be ~~The park should be centrally located and~~ easily accessible and interconnected using a series of paths, trails and sidewalks within the Plan Area along the Observation Drive, Little Seneca Parkway, the Coolbrook Tributary and any other planned streets that could enhance overall connectivity. ~~-corridor.~~ (See also Parks, Open Spaces, and Recreation recommendations.)
11. New development of public spaces should provide opportunities for "third places," publicly accessible open space available for community gatherings, events, and activities, such as a farmer's or artisans market, outdoor movie screenings, group exercise classes, small dance and music performances, and other community gatherings. These spaces may serve multiple purposes, such as providing opportunities for active recreation, commemoration of local history, and a place for social gathering.
- ~~12.~~ Consider p~~Preserv~~ing e-existing open space, topography, mature shade trees, and forest stands as part of the planned development in this neighborhood where feasible. The existing forest stands along the northern property line and south of the former COMSAT Laboratories property should be prioritized for preservation and incorporated into any required open space, especially on forested slopes.