

From: [Bob Elliott](#)
To: [Harris, Artie](#); [MCP-Chair](#); [Coello, Catherine](#); [Bartley, Shawn](#); [Pedoeem, Mitra](#); [Hedrick, James](#); [Linden, Josh](#)
Cc: [Robins, Steven A.](#); [Casey Blair Anderson](#) (canderson@rodgers.com); gunterberg@rodgers.com; [Mike Alexander](#)
Subject: Climate Assessment Clarksburg Gateway Sector Plan
Date: Wednesday, January 7, 2026 12:35:03 PM
Attachments: [image001.png](#)
[RF Climate Action Plan Letter 01 07 2026.pdf](#)

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Dear Chair Harris and Members of the Board,

Attached please find a letter on behalf of River Falls Investments LLC in response to the recent posting of the Climate Assessment for the Clarksburg Gateway Sector Plan.

Thank you,

Bob Elliott

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



Bob Elliott

CHIEF EXECUTIVE OFFICER

RIVER FALLS INVESTMENTS

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January 7, 2026

By Electronic Mail

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

Re: *Climate Assessment - Clarksburg Gateway Sector Plan*

Dear Chair Harris and Members of the Planning Board,

I am writing to object to the staff Climate Assessment accompanying the Planning Board Draft of the Clarksburg Gateway Sector Plan.

Their assessments rest on flawed assumptions, among them the idea that if additional housing is not built in Clarksburg, the people who would have lived there simply vanish. Those people will still exist and will live somewhere else – very likely farther from jobs, services, and transit. The assessment fails to account for this displacement effect and instead treats reduced housing production in Clarksburg as if it eliminates people rather than relocates them. That assumption systematically biases the analysis toward higher greenhouse gas emissions for the Sector Plan, when the more realistic comparison may well show the opposite.

Moreover, this assessment also appears to be used as a vehicle to revive recommendations on tree retention, green cover calculations, and 200' setbacks - particularly along I-270 - that were debated extensively and rejected by the Planning Board on two separate occasions during the Clarksburg Gateway Sector Plan drafting. Reintroducing these concepts through a Climate Assessment, rather than through the plan itself, is procedurally inappropriate and undermines the Board's prior policy decisions.

The timing of the assessment compounds these problems. The assessment should have been released in August, which would have allowed all affected property owners and other stakeholders a fair opportunity to review and respond to its methodology and conclusions.



Issuing it now places the Planning Board in the untenable position of transmitting a negative climate assessment to the County Council for a plan the Board is simultaneously recommending for adoption, all without meaningful opportunity for rebuttal or correction.

I recognize the Board's obligation to transmit a Climate Assessment and agree that it should be forwarded to the Council to avoid delaying consideration of the Sector Plan. However, the transmission should make clear – explicitly and unequivocally – that the Planning Board does not endorse the assessment's assumptions, methodology, or conclusions, and that the assessment should not be read as a basis for reopening policy choices the Board has already made on the Sector Plan.

As always, thank you for your consideration of our concerns.

Sincerely,

Robert J. Elliott, Jr.

cc: Mike Alexander
Steven A. Robins, Esq.
Gary Unterberg
Casey Anderson