

Date: January 21, 2026

To: Montgomery County Council President and Councilmembers

From: Roberta G (rg) Steinman

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

I serve on the Board of Friends of Ten Mile Creek and Little Seneca Reservoir. The mission of FoTMC is "...to serve as guardians of Ten Mile Creek and its watershed, preserving and protecting this unique place and to protect the water quality of Little Seneca Reservoir as a regional water supply and recreational and wildlife resource." Little Seneca Creek, which flows through the Clarksburg Plan sector area, is the largest stream that flows into Little Seneca Reservoir. This Plan would negatively impact the stream and the environmental integrity of this ecosystem.

I will focus my comments on **key land cover elements that influence stream conditions and environmental health: Water Quality, Forest Preservation and Imperviousness.**

Department of Environmental Protection's (DEP) September 22, 2025 comments to the Planning Board cited the following regarding the Little Seneca Watershed, where the Clarksburg plan is located:

-- Between 2017 and 2023 the Little Seneca Creek watershed had the greatest increase in the percentage of **impervious** surfaces of any watershed in the County. Imperviousness increased from 19.9% to 22.3%. Under the suggested development scenario, imperviousness would continue to increase substantially.

-- Between 2008 and 2023, both **forest cover** (27.9% to 25.3%) and **tree canopy** (39.3% to 37%) declined by several percent in the Sector Plan area. This plan would destroy more forests and trees.

-- DEP data also shows that **stream conditions have been declining** in the Clarksburg SPA since development began in earnest in 1998. At the time of the 1994 Clarksburg Master Plan, all the streams in the Clarksburg SPA were in Good and Excellent condition. In 2020, the **streams' conditions declined to Good and Fair. None were rated Excellent.**

This Draft Clarksburg Plan would increase impervious surface, remove forests, and reduce tree canopy – all of which would damage our environment and degrade Little Seneca Creek and Little Seneca Reservoir.

The Clarksburg Gateway Sector Plan area lies entirely within two Special Protection Areas (SPAs) – The Clarksburg and TenMile Creek SPAs. "According to Montgomery County Environmental Guidelines (2021), **"The County's goal in special protection areas is to protect and maintain high-quality or sensitive water resources and related environmental features in identified geographic areas where proposed land uses threaten those resources and a higher level of environmental protection is needed"** (p.24). Most of the Plan is in the Clarksburg SPA.

Despite the SPA designation, the Clarksburg SPA has not effectively safeguarded the **key land cover elements** that influence stream and environmental health – **forest cover and impervious surface area**. In the face of **declining stream health and water quality, increasing forest loss and fragmentation, and increasing levels of imperviousness**, more talk of balancing development with more of the same is extreme policy myopia in the face of the planetary crises we are facing.

Having failed at protecting the streams and the forests, **what can be done to correct this?**

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

Here are four **specific recommendations to ensure that this plan safeguards streams and forests and halts further deterioration:**

1. **Conserve the remaining 285 acres of forest** occurring within the 969-acre sector plan boundary. Nearly all the 285 acres of forest in the sector plan area are **State-designated Priority Urban Forests**, including **4 Priority Urban Forest groves on the 200-acre COMSAT property**, where development pressure is greatest. There is sufficient open space on the COMSAT property such that any development plans (roads, houses, etc) can avoid impacting the COMSAT Priority Urban Forest groves.

Priority Urban Forests are forests that the State considers **priorities for retention and protection**. This designation provides the foundation to choose alternatives that cause the least damage to the environment. But unless these forested areas are actually preserved, the purpose of the Priority Urban Forest designation will not be achieved.

The Sector Plan can also protect these forests by avoiding the construction of new roadways through forests, parks, streams, stream valleys, and wetlands and by limiting development – and hence limiting impervious surface area – on the 200-acre site of the historic COMSAT building. Such an approach would harmonize

with the Sector Plan's compact community vision, rather than an outdated regional hub vision. Scaling back the extent of development would also contribute to reducing congestion on the roads.

2. Avoid construction of new roadways through forests, parks, streams, stream valleys, and wetlands. The most environmentally destructive roads in the Plan are the I-270 interchange and the northern extension of Observation Drive.

- **Remove the I-270 Interchange** from the plan. The I-270 Interchange is the most environmentally damaging alternative for access to the sector plan due to its destructive impacts to **eleven acres of forests, streams, and wetlands**. Also, an I-270 Interchange is not in keeping with the compact and walkable communities vision.
- **Eliminate the northward extension of Observation Drive** south of West Old Baltimore Road due to the extreme environmental impacts. The northern extension of Observation Drive across Little Seneca Creek would cut through and destroy upland **Priority Urban Forests**, cross floodplains, traverse wetlands and steep slopes, and would sever both the Little Seneca and North Germantown Greenway stream valley parks – all of this would seriously degrade the mainstream of Little Seneca Creek. This forest within the proposed alignment of the northern extension of Observation Drive, east of Little Seneca Creek, is **Priority Urban Forest**, and it needs to be preserved.

3. Preserve additional land through parkland dedication and conservation easements. Expand parkland and conservation easements along all waterways in the sector plan area to enlarge the stream buffers and protect water quality. Given the rapid development in the Clarksburg area, greater stream and forest protection is critical to protect the streams and to safeguard ecological and human health.

4. Adopt enhanced SPA safeguards. Adopting stronger safeguards, like the ones used in the Ten Mile Creek SPA, would help considerably “to protect and maintain high-quality of sensitive water resources.

- Increase stream buffers to 200 feet “on both sides of perennial and intermittent streams, and adjacent to springs and seeps.” (2014 Ten Mile Creek Area Limited Amendment, p.19)
- 80% Open Space requirement, “which includes environmental buffers and sensitive areas.” (2014 Ten Mile Creek Area Limited Amendment, p.19)

If adopted, these 4 recommendations would lessen the damaging impacts of the Clarksburg Gateway Sector Plan and would protect stream and forest health, and the water quality of Little Seneca Reservoir. Earth-friendly environmental actions— protecting forest, limiting the extent of development, and utilizing existing roads – are critical not just to safeguarding water quality, but also to improving air quality, combatting climate extremes, fostering native biodiversity, and protecting human health and the quality of life for all. Montgomery Planning and County Council have an opportunity to protect our forests and waters by putting in place strong requirements that will prevent further degradation of our vital and irreplaceable environmental treasures.

Protecting a place is the same as protecting a part of ourselves.

We cannot go on destroying ecosystems and making the Earth uninhabitable for some species and expect it to remain habitable for our species.

Notes:

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

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

Respectfully submitted for your consideration,

Roberta G (rg) Steinman, Board Member
Friends of Ten Mile Creek and Little Seneca Reservoir

¹ A December 14, 2020 Montgomery County Parks Department PowerPoint Presentation, “Algae Blooms and Our Local Lakes,” reported finding microcystin toxin in Little Seneca Lake and the Cabin Branch Forebay of Little Seneca Lake in August 2020.