



P.O. Box 4024
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September 7, 2021

Mr. Casey Anderson, Chair
Montgomery County Planning Board
2425 Reddie Drive, 14th Floor
Wheaton, Maryland 20902

RE: Creekside at Cabin Branch Site Plan #820200160

Dear Chair Anderson and Planning Board members,

The Sierra Club Montgomery Group believes it is critically important that the Planning Board deny approval of the Creekside at Cabin Branch site plan. The proposed development is located entirely within the two most fragile, sensitive and high-quality sub watersheds in the Ten Mile Creek Watershed, Little Seneca Ten Mile (LSTM) 110 and LSTM 111, and would irreparably harm stream conditions, water quality and the native ecosystem. Ten Mile Creek is the cleanest tributary that flows into the Little Seneca Reservoir, the back-up drinking water supply to the Potomac River, which serves over 400 million people in the Washington DC region. The Ten Mile Creek watershed also is home to at least seven rare plants and more than 450 native plant species which inevitably would be adversely affected by the Creekside at Cabin Branch project.

Pulte's proposed development as currently envisioned conflicts with the intent and recommendations of the 2014 Ten Mile Creek Area Limited Amendment to the Clarksburg Master Plan. For example, on page 16, the amendment reads, "High quality sub watersheds with very low impervious cover, such as LSTM 110 (1.6 percent) and LSTM 111 (1.2 percent), are more sensitive to changes in impervious cover than watersheds like LSTM 206 (16.6 percent) and LSTM 202 (11 percent) which already have a significant amount of existing impervious cover and are showing signs of degradation."

The impervious cover percentages proposed by the developer for LSTM 110 would increase the impervious cover from the existing 1.6 percent to as high as 9.7 percent, and LSTM 111 would have impervious cover increased from the existing 1.2% to 12.8%. These proposed increases in impervious cover conflict with the Ten Mile Creek Area Limited Amendment which reads (on page 17), "Recent studies (see Appendix 9, Attachment 18) have shown that impervious cover levels as low as 5 percent are correlated with significant degradation in water quality. This Plan recommends a six percent impervious surface cap for new development in the most sensitive sub watersheds to minimize risk as much as possible."

The proposed development also would require bulldozing, regrading, bringing in fill dirt and otherwise disturbing 76 acres of land, or 24 percent of the combined land area of the two sensitive sub watersheds. Severe erosion of the soil would be likely because of the steep slopes of the affected area, especially because changes in climate already are increasing severe storm events that cause flooding and flow of sediment into creeks, smothering plants and aquatic life, further increasing environmental degradation.

Ten Mile Creek is critical to the future of our supply of local, clean drinking water as climate change is making severe storms and droughts become more frequent while growth in the area population is projected to increase in the coming decades. Ten Mile Creek must not be allowed to go the way of Cabin Branch Creek, its sister tributary, which has been severely degraded by significant housing development.

“Ten Mile Creek is a reference stream in Montgomery County, serving as high quality benchmark against which other streams are compared,” the Amendment states (on page 14). “As a result of its unique characteristics, Ten Mile Creek warrants extraordinary protection.” To provide that protection to this important natural resource of the county, Pulte’s proposed site plan must not be approved.

Climate change is not an accident waiting to happen, it’s an accident in the process of happening. The Planning Board and each of us has a role to play in order to help the county adapt and achieve the resiliency and sustainability needed for the future of the county and its residents.

Thank you for your attention to this important matter.

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CC: County Executive, March Elrich
County Council Members