FINAL DRAFT

AMENDMENT TO THE APPROVED AND ADOPTED
MASTER PLAN FOR HISTORIC PRESERVATION IN
MONTGOMERY COUNTY, MARYLAND

CLARKSBURG HISTORIC DISTRICT

An amendment to the Master Plan for Historic Preservation; being
also an amendment to the 1968 Clarksburg and Vicinity Master
Plan (amended 1985, 1986); and an amendment to the General Plan
for the Physical Development of the Maryland-Washington
Regional District within Montgomery County, Maryland.

Prepared By:

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
Montgomery County Planning Board
8787 Georgia Avenue
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February, 1989

Revised By:
THE MONTGOMERY COUNTY EXECUTIVE
(Date to be established)

Approved By:
THE MONTGOMERY COUNTY COUNCIL
(Date to be established)
ABSTRACT

TITLE: Final Draft Amendment to the Master Plan for Historic Preservation: Clarksburg Historic District

AUTHOR: The Maryland-National Capital Park and Planning Commission, Montgomery County Planning Board

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ABSTRACT: This document contains the text, with supporting maps, for an amendment to the Master Plan for Historic Preservation in Montgomery County, being also an amendment to the 1968 Clarksburg and Vicinity Master Plan (amended 1985, 1986); and an amendment to the General Plan for the Physical Development of the Maryland-Washington Regional District within Montgomery County, Maryland. This amendment designates an area of Clarksburg as the Clarksburg Historic District to be protected under the County's Historic Preservation Ordinance, Chapter 24A of the Montgomery County Code.
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ELECTED AND APPOINTED OFFICIALS

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MASTER PLAN AMENDMENT PROCESS

Master Plans provide policy guidance concerning the private and public use of land, for use and reference by private landowners, public agencies, and interested parties generally. Every master plan amendment also amends the General Plan for Montgomery County. The process of initiation, review, and adoption of amendments is generally as follows:

Preliminary Draft Amendment

This document is a formal proposal to amend an adopted master plan. It is prepared by the Montgomery County Planning Board of The Maryland-National Capital Park and Planning Commission. Before proceeding to publish a final draft amendment, the Planning Board must hold a public hearing. After the close of the record of this public hearing, the Planning Board holds an open worksession to review the testimony, and to determine whether to make any revisions to the preliminary draft.

Final Draft Amendment

This document contains the Planning Board's final recommendations. It is transmitted to the County Executive, who must review it and forward it to the County Council, with any revisions deemed appropriate. If the County Executive makes no revisions in the Planning Board's final draft, the Council may adopt the unchanged draft without holding a public hearing. If the Executive does make revisions, or if the Council wishes to consider any revisions, the Council must schedule a public hearing. After the close of record of this public hearing, the Council holds an open worksession to review the testimony, and then adopts a resolution approving, modifying, or disapproving the final plan amendment.

If the Council action modifies and approves the Executive's Revised Final Draft Amendment, the Approved Amendment must be sent to the County Executive for approval or disapproval. If disapproved by the County Executive, the Council may override the disapproval of the Plan by an affirmative vote of five members.

Failure of either the County Executive or the Council to act within the prescribed time limits constitutes approval of the plan amendment as submitted to the body which fails to act.

Adopted Amendment

The amendment approved by the County Council is forwarded to the Maryland-National Capital Park and Planning Commission for adoption. Once adopted by the Commission, the amendment officially amends the various master plans cited in the Commission's adoption resolution.
HISTORIC PRESERVATION MASTER PLAN AMENDMENT

The Master Plan for Historic Preservation and the Historic Preservation Ordinance, Chapter 24A of the Montgomery County Code, are designed to protect and preserve Montgomery County's historic and architectural heritage. When an historic resource is placed on The Master Plan for Historic Preservation, the adoption action officially designates the property as an historic site or historic district, and subjects it to the further procedural requirements of the Historic Preservation Ordinance.

Designation of historic sites and districts serves to highlight the values that are important in maintaining the individual character of the County and its communities. It is the intent of the County's preservation program to provide a rational system for evaluating, protecting and enhancing the County's historic and architectural heritage for the benefit of present and future generations of Montgomery County residents. The accompanying challenge is to weave protection of this heritage into the County's planning program so as to maximize community support for preservation and minimize infringement on private property rights.

The following criteria, as stated in Section 24A-3 of the Historic Preservation Ordinance, shall apply when historic resources are evaluated for designation in the Master Plan for Historic Preservation:

(1) Historical and cultural significance:

The historic resource:

a. has character, interest, or value as part of the development, heritage or cultural characteristics of the County, State, or Nation;
b. is the site of a significant historic event;
c. is identified with a person or a group of persons who influenced society;
d. exemplifies the cultural, economic, social, political or historic heritage of the County and its communities; or

(2) Architectural and design significance:

The historic resource:

a. embodies the distinctive characteristics of a type, period or method of construction;
b. represents the work of a master;
c. possesses high artistic values;
d. represents a significant and distinguishable entity whose components may lack individual distinction; or
e. represents an established and familiar visual feature of the neighborhood, community, or County due to its singular physical characteristic or landscape.
IMPLEMENTATION OF THE MASTER PLAN FOR HISTORIC PRESERVATION

Once designated on the Master Plan for Historic Preservation, historic resources are subject to the protection of the Ordinance. Any substantial changes to the exterior of a resource or its environmental setting must be reviewed by the Historic Preservation Commission and an historic area work permit issued under the provisions of the County’s Preservation Ordinance, Section 24A-6. In accordance with the Master Plan for Historic Preservation and unless otherwise specified in the amendment, the environmental setting for each site, as defined in Section 24A-2 of the Ordinance, is the entire parcel on which the resource is located as of the date it is designated on the Master Plan.

Designation of the entire parcel provides the County adequate review authority to preserve historic sites in the event of development. It also ensures that, from the beginning of the development process, important features of these sites are recognized and incorporated in the future development of designated properties. In the case of large acreage parcels, the amendment will provide general guidance for the refinement of the setting by indicating when the setting is subject to reduction in the event of development; by describing an appropriate area to preserve the integrity of the resource; and by identifying buildings and features associated with the site which should be protected as part of the setting. It is anticipated that for a majority of the sites designated, the appropriate point at which to refine the environmental setting will be when the property is subdivided.

Public improvements can profoundly affect the integrity of an historic area. Section 24A-6 of the Ordinance states that an Historic Area Work Permit for work on public or private property must be issued prior to altering an historic resource or its environmental setting. The design of public facilities in the vicinity of historic resources should be sensitive to and maintain the character of the area. Specific design considerations should be reflected as part of the Mandatory Referral review processes.

In the majority of cases, decisions regarding preservation alternatives are made at the time of public facility implementation within the process established in Section 24A of the Ordinance. This method provides for adequate review by the public and governing agencies. In order to provide guidance in the event of future public facility implementation, the amendment addresses potential conflicts existing at each site and suggests alternatives and recommendations to assist in balancing preservation with community needs.

In addition to protecting designated resources from unsympathetic alteration and insensitive redevelopment, the County’s Preservation Ordinance also empowers the County’s Department of Environmental Protection and the Historic Preservation Commission to prevent the demolition of historic buildings through neglect.
The Montgomery County Council passed legislation in September 1984 to provide for a tax credit against County real property taxes in order to encourage the restoration and preservation of privately owned structures located in the County. The credit applies to all properties designated on the Master Plan for Historic Preservation (Chapter 52, Art. VI). Furthermore, the Historic Preservation Commission maintains up-to-date information on the status of preservation incentives including tax credits, tax benefits possible through the granting of easements on historic properties, outright grants and low-interest loan programs.
THE AMENDMENT

The purpose of this amendment is to designate a portion of the community of Clarksburg as the Clarksburg Historic District on the Master Plan for Historic Preservation, thereby extending to the district the protection of the County’s Historic Preservation Ordinance, Chapter 24A of the Montgomery County Code.

INTRODUCTION

Clarksburg is one of the County’s oldest and most significant early communities. The history of Clarksburg reflects the development and growth of the County as a whole: from its earliest development in the mid-1700’s as a stagecoach stop between Frederick and Georgetown, through its heyday in the 19th century as the center of trade and industry for northern Montgomery County--growing to the third most populous town in the County in 1879, and finally its early 20th century importance as a rural center with a number of small hotels and boarding houses to accommodate the new automobile tourism.

Because of this unique and rich history, the Clarksburg community clearly meets a number of criteria of the Historic Preservation Ordinance for designation as a historic district on the Master Plan for Historic Preservation. Specifically:

1A. "Has character, interest or value as part of the development, heritage or cultural characteristics of the county, state or nation" as the community retains a large degree of its early 19th - early 20th century character and reflects the town’s history as a center of trade, transport, and industry.

1D. "Exemplifies the cultural economic, social, political or historic heritage of the county and its communities" through its early buildings which were associated with town founder John Clark and other leading citizens of the 19th century period when Clarksburg was Montgomery County’s third largest town.

2A. "Embodies the distinctive characteristics of a type, period or method of construction" through the district’s intact collection of residential, commercial, and religious buildings which includes both vernacular and high style designs and which dates from the early 19th through the early 20th centuries.

2D. "Represents a significant and distinguishable entity whose components may lack individual distinction" as a group of buildings comprising a district which is important as a whole greater than the sum of its parts. The district’s resources retain a large degree of their original relationship to one another.

In addition to the architectural and historical significance of the Clarksburg Historic District, there are a number of planning issues associated with the area which should be noted. Road
widenings and, most importantly, lack of sewer and water services could potentially threaten the preservation of Clarksburg’s important historic resources.

The Clarksburg Historic District is centered on Route 355 at its intersection with Route 121. Most of the structures are located very close to the road--almost all would be within the right-of-way of Route 355, if it were to be widened as a Major Highway (its current classification).

In essence, the crossroads of Clarksburg currently cuts through the proposed historic district. However, a new crossroads may be formed with the future relocation of Route 121 to join with Stringtown Road and the construction of M-83. This shifting of the major crossroads and lessening of the traffic burden on Route 355 would complement the preservation of the historic district.

New development in and around the Clarksburg Historic District should be sensitive to the historic fabric of the area. Vehicular and pedestrian connections between the district and new neighborhoods are appropriate and should be accomplished within existing building patterns or through the sensitive relocation of contributing historic resources.

Water and septic issues have, in recent years, contributed to difficulties in preserving Clarksburg’s historic resources. Historic properties receive no special treatment by the Health Department for well and septic requirements; rather all existing buildings are treated alike. Septic considerations are real, ongoing problems throughout the Clarksburg area because of poor percolation of the soils. It is the intention of this amendment to encourage the relevant agencies to seek creative solutions to these problems in order to enhance the long-term use and preservation of the buildings within the Clarksburg Historic District. The best efforts possible should be made to solve the sewer/septic problems for both the historic district and the broader community. It is critical that solutions be derived which provide for continuing viable use and rehabilitation where necessary of these valuable historic resources.

In conjunction with historic designation, it is essential to recognize and address the planning issues which have such a direct impact on the long-term future of the Clarksburg Historic District, one of the County’s oldest and most historic towns. The comprehensive revision of the overall Clarksburg Master Plan may provide an appropriate opportunity to focus on and solve these problems, as well as a chance to successfully integrate the Clarksburg Historic District into the future development of Clarksburg as a "Corridor City".
Historic Significance of the Resource:

- The Clarksburg Historic District is important as a linear grouping of early-19th to early-20th century buildings which reflect the community’s prominence as a center of transport, trade, and industry for northern Montgomery County. It is among the County’s earliest and most intact historic towns.

- The area was initially developed by John Clark, who established a trading post at what was in the mid-18th century the intersection of two Indian trails. In the latter part of the century, the north-south trail became a major transportation route for travelers from Frederick to Georgetown. Clark purchased tracts of land along the Frederick-Georgetown road and by the early 1790s the land was divided into lots and the community became known as Clarksburg.

- As a major stagecoach stop between Frederick and Georgetown, Clarksburg supported several inns and taverns. By the mid-1800s, the town also included general stores, a tannery and related leatherworking operations, a machine shop, blacksmiths, and wheelwrights. In 1879, Clarksburg had 250 residents, making it the third most populous town in Montgomery County.

- Growth in Clarksburg declined in the late 1800s when the B & O Railroad bypassed the town for nearby Boyds. The advent of the automobile and improved roads brought something of an economic revival beginning in the 1920s. New boarding houses opened in town to accommodate the new auto tourism.

Architectural Significance of the Resource:

The district is predominantly characterized by vernacular Victorian wood frame buildings oriented towards Frederick Road (Rt. 355), to the north and south of the intersection with Clarksburg Road (Rt. 121), including several examples of high-style architecture. A number of early log buildings remain beneath later siding and/or additions. The collection of buildings continues to exist in the same mutual relationship as when they were first combined.
Contributing Resources:

Day House 23200 Stringtown Road
  o Built in the American Foursquare style, this two-story, wood-frame house features a one-story, wrap-around porch.
  o The residence is believed to have been built in 1925 by Clarence P. and Dorothy L. Day.

Hammer Hill 23310 Frederick Road
  o This large, elaborately-executed, high-style Queen Anne residence has a three-story projecting front, one-story porch with turned posts and jigsawn trim, and double-paneled doors surrounded with transom and sidelights.
  o It was built c. 1891-1900 by Clarksburg physician Dr. James Deets and his wife Sarah. The name, Hammer Hill, comes from the tract name given to this land in 1752.

Columbus Woodward/John Wims House 23311 Frederick Road
  o A two-story vernacular frame building, this gable-roofed dwelling has a symmetrical three-bay facade featuring a front porch with turned posts and jigsawn ornamentation.
  o The house was built in two stages, with the rear portion built in the early-19th century. The current main block is believed to have been constructed c. 1892 when John H. Wims, a mail carrier and former slave, purchased the property. Columbus Woodward, a carpenter, was an occupant in 1879.

20th Century House 23314 Frederick Road
  o A simple vernacular frame structure, this three-by-three bay, 1-1/2-story, gable-front residence has a Bungalow-influenced porch across the length of its main facade.
  o This dwelling is typical of those built from the 1910s to the early 1930s and is representative of the brief revival enjoyed by Clarksburg after the advent of the automobile.

Clarksburg Grocery 23329 Frederick Road
  o Built of rock-faced concrete block, this one-story, early-20th century store is a gable-front structure with a simple three-bay front porch. The building is augmented by a shed-roofed side addition.
  o The store was probably built in 1923 for Sarah E. Purdum, who sold the property the same year to E. Lillian and Elwood E. Barr.
Gardner House 23330 Frederick Road

- An early-20th-century frame house, this cross-gabled Colonial Revival structure has a wrap-around porch which now exhibits late-Victorian influence in its jigsawn trim dating from a recent rehabilitation.

- The residence was probably built in 1911 by John Gardner and his wife, Laura.

Clarksburg School 13530 Redgrave Place

- A 1-1/2-story frame structure, the main facade of the rectangular school features a 1-1/2-story projecting pavilion which contains the double-door entrance. The pediment surmounting the doorway is echoed in a shingled pediment in the gable above. Narrow clapboards and tall windows give the building a vertical orientation.

- The school is one of the last remaining examples of a two-room school in the County. It was in continuous use from 1909 to 1972 when it was moved 300 ft. to its current location. The school is on the same site as an earlier one-room school and is within 1/4 mile of the Clarksburg Academy (1833) site. The structure was listed on the National Register of Historic Places in 1975 and on the Montgomery County Master Plan for Historic Preservation in 1979.

- The Clarksburg School is being included within the boundaries of the historic district because it is an important feature of the early town of Clarksburg and adds to the understanding and interpretation of this community’s history.

Horace Willson House 23335 Frederick Road

- This vernacular 1-1/2-story frame dwelling has a three-bay facade with two dormers set in the side-gable roof. The long, low front porch is supported by square wooden posts, and the front door is surmounted by a glass transom.

- The house is associated with several of Clarksburg’s leading citizens, especially members of the medical profession. The original (rear) portion was likely built c. 1800 by Dr. John Reid, then sold to physician Dr. Horace Willson who served in the State House of Delegates (1831-1832) and in the State Senate (1838-1841). Willson constructed the large front section of the house between 1827 and 1843; the current front porch dates from the early 20th century.

Leonidas Willson House 23340 Frederick Road

- This two-story dwelling has a three-bay facade and eaves-front roof with center gable. Fine Italianate detailing is exhibited in its bracketed eaves, molded
lintels, chamfered porch posts connected by flattened arches, and double-door entry with transom and sidelights surmounted by a pair of windows.

- The earliest (rear) portion of the house was constructed in the beginning of the 19th century. The present main block was built c. 1840 by prominent Clarksburg merchant William Willson who operated the town's general store. From 1869 to 1911, the house was owned by leading citizen Leonidas Willson (William's son) and his wife Maria Willson. During the 1920s, the Boxwood Inn, a boarding house, was operated here by Mr. and Mrs. Howard Miles.

Willson's Store 23341 Frederick Road

- A 2-1/2-story frame store, the building was constructed in two sections: the major one has a front-gabled facade and the lesser side section has a flat roof. Both portions are joined by a four-bay porch with five metal poles and two sets of stairs corresponding to separate sets of double doors.

- The first section of this building appears to have been built around 1842 by William Willson, son-in-law of John Clark, founder of Clarksburg. The site is where Clark had established the town's first trading post. The building, whose second section was built sometime after 1860, served as trading post, general store, post office, and community gathering place. Willson family members owned the property for over 130 years.

Old Parsonage 23345 Frederick Road

- Italianate in style, this two-story, side-gable residence features a bracketed cornice, prominent window surrounds, and a central door with transom.

- The building, constructed c. 1856-1865, was used by the Methodist Episcopal Church as a parsonage until 1915, when 23407 Frederick Road was built.

Clark/Waters House 23346 Frederick Road

- A 2-1/2-story, Italianate-style frame residence, the building's five-bay symmetrical facade is characterized by small scrolled brackets at the eaves, denticulated porch cornice, and wide, flat window lintels.

- An important example of Clarksburg's early architecture, the house is associated with John Clark, town founder, who probably built the original section (said to be part log) in 1797. The building was enlarged and updated in the 1840s, by Clark's daughter and son-in-law Mary and William Willson.
Elizabeth Powers House 23360 Frederick Road

o This 2-1/2-story vernacular frame dwelling has a three-bay facade which features a denticulated cornice and a simple central doorway with portico flanked by two pairs of double windows.

o The structure was built in two stages, with the rear portion constructed c. 1820 by Henry Burnsides who established an adjacent tannery, a major industry in Clarksburg. Issac and Elizabeth Powers (Clarksburg postmistress) purchased the property in 1831 and added the present main block around 1840.

John Gibson House 23362 Frederick Road

o This two-story frame house includes impressive architectural detailing—among the most elaborate in Clarksburg: an early hip roof, segmentally-arched and shuttered windows, and intricate jigsaw trim decorating the porch, cornice and window hoods. The three bay facade features a transom and sidelighted central entry.

o The house was probably constructed about 1840 by John Winemiller, Jr., who operated an adjoining tannery. The tanning business was one of the major industries in Clarksburg in the 19th century.

o The house's subsequent owner was John Gibson who operated the Nichols & Gibson General Store and who may have been associated with the Gibson Hotel—a large Victorian hotel which was destroyed by the construction of the current Route 121.

o Septic problems have prevented the rehabilitation of the Gibson House. Provision of septic service is essential to the existence of this property.

Clarksburg Methodist Episcopal Church 23425 Spire Street

o This 1-1/2-story, frame, Gothic Revival church is distinguished by pointed-arch window and door openings and open pointed arches on all four sides of the 2-1/2-story bell-tower.

o This congregation is one of the oldest continuous Methodist congregations in Montgomery County. John Clark, founder of Clarksburg, was a Methodist and a leader in organizing the church in 1788. A log chapel was built on this site in 1794, a brick structure in 1853, and the present frame church in 1909.
W.J. Dronenburg House 23401 Frederick Road

- This front-gable, 2-1/2-story house is Clarksburg’s only early brick residence. Numerous additions and alterations have severely compromised the original character of the building.

- William Dronenburg, the town’s leading blacksmith, constructed the house around 1865. Historically the house is a reminder of the 19th-century industrial/commercial importance of Clarksburg.

Methodist Episcopal Church Parsonage 23407 Frederick Road

- A good example of the American Foursquare style, the frame house is characterized by its simple, two-story cubic form, hipped roof and dormer windows on each elevation. A five-bay porch extends beyond the length of the main facade.

- The parsonage was built in 1914 by the Trustees of the Montgomery County Circuit of the Methodist Episcopal Church. It was sold by the church in 1941.

John Leaman House 23415 Frederick Road

- This house was constructed in two stages. The earliest, front section is a clapboarded, 1-1/2-story log structure. A large 2-1/2-story rear frame addition was built in the late-19th century.

- The structure is one of the few remaining log buildings in the community. Historically the house is associated with Thomas Kirk who probably built and sold it in 1801. Local carpenter Wattee Williams purchased the property in 1818 and he or his family owned the house through most of the period until 1866. Another carpenter, John Leaman, purchased the property in 1871 and the Leamans had the rear addition built around 1890.

William Hurley House & Shoe Shop 23421 Frederick Road

- The house is a 1-1/2 story frame gabled vernacular structure with six-over-six windows. The shoe shop is a simple two-by-one bay 1-1/2-story frame structure with a side-gable roof.

- Constructed in two parts, the frame dwelling may contain an early log section. The original rear portion was built about 1800 by Arnold Warfield. The Hurley family added the front section of the house around 1872. The shoe shop was probably built around 1842, and housed Helen Hurley’s millinery shop in the early-20th century. Hurley family owners, included shoemaker William Hurley and Clarksburg Brass Band organizer J. Mortimer Hurley.
Lewis/Soper House 23515 Frederick Road

- This large Victorian influenced two-story, eaves-front frame house is three bays wide and features a center gable and double entrance doors.
- Typical of late-nineteenth-century, rural, vernacular dwellings in the county, the structure was probably built in 1890 by William W. Lewis. It was owned by William and Mary Soper during much of the first half of the 20th century.

Non-Contributing Resources:

United States Post Office 20871 Frederick Road

- Built in the 1960s, the Post Office is a one-story brick and steel structure whose main facade is composed largely of a window wall.

House 23356 Frederick Road

- A 1-1/2-story Cape Cod structure, this house has had numerous alterations including stucco siding, new windows and door openings, and a one-story, shed-roofed, side addition with roof deck.

House 23411 Spire Street

- This one-story, brick-sided, ranch-style house built in the 1950s has rectangular massing with a side-gable roof and attached two-car garage.

House 23415 Spire Street

- A one-story, aluminum-sided, ranch-style house built in the 1950s, the L-shaped structure has an attached one-car garage.

House 23419 Spire Street

- This 1-1/2-story, Bungalow-style house has a three-bay, eaves-front facade marked by a three-bay front porch. The structure was built in the 1920s-30s.

District Boundaries:

The boundaries of the Clarksburg Historic District include the major concentration of extant 19th and early-20th century residential, commercial and civic structures. Among these are the shoe shop, the blacksmith's house, several stores, a church and two parsonages, and the Clarksburg School, all of which speak to the history of a thriving 19th century community.
Clarksburg historically was a linear community with narrow building lots all facing on and related to a major north-south route, Frederick Road (MD 355). The historic district boundaries largely follow this linear development pattern. The introduction of Route 121 in the 1950s bisected the town and changed the perceived character of the area to that of a crossroads. Historically, however, the northern and southern sections of Clarksburg were a cohesive whole with shops, homes and businesses throughout.

At the literal and figurative heart of the community was the Methodist Episcopal Church with its first parsonage along Frederick Road to the south and its newer parsonage built in the early 20th Century—also on Frederick Road—slightly to the north. Interestingly, the land in the triangle formed by Spire Street and Frederick Road (and now Route 121) has, for much of its history, been vacant. For a period of time there was a Methodist Church South located in this vicinity, but most of this land has always been vacant.

It is the intention of this amendment to provide for lenient review by the Historic Preservation Commission of changes to or demolition of the non-contributing properties within the district. In particular, changing needs of the Methodist Church could necessitate expansion of its facilities onto the adjacent parcel, P-13, which is currently the site of a non-contributing structure. It is not the intention of this amendment to prohibit such an expansion. New construction within the district would be reviewed by the Historic Preservation Commission, under the provisions of the Historic Preservation Ordinance.

In addition, the intention of including vacant parcels within the district boundary is not to impede development of these properties, but rather to assure that new development is in keeping with and complements the character of the historic area. It would be appropriate, in fact, to encourage the relocation of threatened historic resources in other parts of the Clarksburg planning area to the vacant parcels within the historic district.
CLARKSBURG HISTORIC DISTRICT

MASTER PLAN FOR HISTORIC PRESERVATION

RESOURCE #13/10

DISTRICT BOUNDARIES

CONTRIBUTING RESOURCES

NONCONTRIBUTING RESOURCES

UNDEVELOPED PARCELS