

From: [Robeson Hannan, Lynn](#)
To: [Johnson, Nana](#)
Subject: FW: CBA 1174-E/Questions and Missing Information
Date: Thursday, November 13, 2025 4:27:26 PM

So sorry. This should go in the record.

From: Robeson Hannan, Lynn
Sent: Wednesday, November 12, 2025 1:32 PM
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Subject: CBA 1174-E/Questions and Missing Information

Good afternoon everyone. I hope this finds everyone well.

I have completed a preliminary review of the record of this case and believe that some items are missing in the application. I also have some questions about the use, the analysis, and Staff's recommended conditions. These are as follows:

1. Criteria for approval in 59-G-1.22 is missing: Neither the Applicant's Statement of Justification (SOJ) or the Staff Report contain any analysis of the general standards for approval in 59-G-1.22, including an analysis of inherent and non-inherent characteristics. *I cannot make a recommendation without these.*
2. Other findings not fully addressed (59-G-2.19):
 - a. 59-G-2.19 (noise, topo, nuisance, information on buffer for athletic fields)
3. Deferred approval of Forest Conservation Plan: The Board of Appeals may not approve a special exception *until the Planning Board approves a Forest Conservation Plan*. Therefore, this may not be deferred to preliminary plan. *Montgomery County Code*, Section 22A-11(c)(2). Please submit an approved amendment to the Forest Conservation Plan along with the Planning Board's resolution of approval.
4. Please update site plan to include following mandatory information. 59-A-4.22; 59-G-2.19. While some improvements may be grandfathered, they are still a requirement and necessary to support statements in the SOJ regarding the impact of the operational changes.

- a. Lighting: Specifically required in site plan and necessary to assess impact and safety of proposed operational changes. Are any of the outdoor fields lit?
- b. Landscaping, fencing, screening, including vegetation, type, width and length; required by site plan and necessary to assess impact of operational changes as, for instance, noise impact is justified by existing landscaping and screening.
- c. Location of bus stop
- d. Topography
- e. Setbacks
- f. Location of sidewalks on and abutting the site and pedestrian crosswalks.
- g. Location of R-200 and R-90 Zones
- h. Show all vehicular and bicycle parking spaces on the site and their locations. Include designated ADA spaces.
- i. Chart of development standards, including setbacks and parking spaces, zone, lot area, lot coverage, minimum front side and rear setbacks, height, parking and bicycle requirements and spaces, density per student
- j. Please show proposed improvements to access at River Road.

5. Other Required items missing from application:

- a. No analysis of Thrive

6. Provide information on:

- a. directional vehicular movements for the internal roadway network.
- b. location of bus stops adjacent to the subject property.
- c. Explain the difference between the before and after school care programs and the existing day care on site.
- d. location of existing Category 1 Forest Conservation Easements on the site.
- e. the frequency of food waste pick-up and deliveries changing with the additional enrollment? How will any increase be mitigated. Is there any change in loading spaces.
- f. Will the rental facilities including weddings, parties or receptions?
- g. There is no analysis of why the increase in activities will not generate undue noise.
- h. Staff Report, p. 25: finding of minimal impact does not address increased intensity of on-site activities.

7. I am unclear whether the Staff Report and attachments include all prior approvals. The Staff Report adds some not submitted by the Petitioner and states that the original SE was approved in 1961. Are there approvals before the oldest one in this record? The resolutions are submitted randomly and consist of over 200 pages. Please summarize each approval and identify the conditions you deem applicable.
8. Was the Community Liaison Committee disbanded when the position of People's Counsel was not funded? Are there any formal or informal regular meetings established between the school and the community?
9. Development conditions:
 - a. Shouldn't there be numerical caps on the number of participants in the ancillary activities and rentals. Without caps, could it possibly change the peak hours? Is the cap 200 persons? What about additional Staff?
 - b. Condition No. 1 in Staff Report: Does the 870 students and 236 staff include the daycare?
 - c. Please incorporate the hours of operation of the school, the existing day care, the before and after school programs during the school year and the summer camp into the recommended conditions of approval.
 - d. Please incorporate the maximum number of staff associated with the summer camps into the conditions of approval.
 - e. Should there be a maximum number of participants in the swimming program.
 - f. Does the 250-participant camp for some of the activities include visitors?
 - g. Are there any development conditions from prior approvals that pertain to this site?
 - h. I assume that you propose to eliminate the non-Holton limitations for school arts? Please confirm.
10. Criteria for Approval:
 - a. Add analysis of 59-G-1.22
 - b. Noise/Nuisance: Does the 200 person cap on students participating in field events/tournaments remain? Does this include visitors and participants. How many attend for the teams?
 - c. Analysis of Thrive

11. LATR: Wouldn't the HE/BOA make the determination of adequate public facilities under Section 59-G-1.21, as the property is not currently in compliance with the preliminary plan?
12. What is the plan for enforcing the TMP? Are there no enforcement mechanisms? Should a representative of the community be included in updated TMPs?

Thank you and have a wonderful day.

Best,

Lynn Robeson Hannan
Hearing Examiner

