

July 8, 2025

Montgomery Planning  
Attn: Mr. Mark Beall  
2425 Reedie Drive, 13<sup>th</sup> Floor  
Wheaton, MD 20902  
*Sent via electronic mail only*

Re: Response to Review Comments – CU202506  
*Torcatto Romano Landscape Contractor*  
14301 Comus Road, Clarksburg, MD 20871  
O'C&L Job #018-016

Mr. Beall:

The following letter details comments and response for Staff comments received on , along with the associated revisions, to the Proposed Conditional Use Plan for Parcel 420, Clarksburg, Maryland. These responses are based on MNCPPC/Montgomery Planning comments dated 03/24/24 and associated correspondence.

Plan Comments: Transportation

**Comment 1:** Submit a Transportation Adequacy Form for review.

**Response:** The Transportation Adequacy form has been completed by the traffic engineer and submitted as part of this documentation package.

**Comment 2:** Update the traffic counts to the current methodology. Person trips are no longer being used, and the 50-trip threshold has changed.

**Response:** The traffic consultant working on this assignment, Lenhart Traffic Consulting, has updated the traffic statement to reflect the updated methodology. This analysis is based on updated operation hours/employee schedules, as enumerated in the Statement of Operations and discussed in Response #3, below. The maximum number of new trips expected is less than 30; a traffic study is not warranted.

**Comment 3:** Please provide more details about the operation hours and employee schedules.

**Response:** OCL and Counsel held a meeting with the owner on May 20, 2025 to obtain additional details about operation hours and employee schedules. Based on this discussion, multiple documents included with this submission have been updated, including the SOO/SOJ, Zoning Report, and Traffic Statement. In general, the crews are expected to arrive around 5:30 AM, load, and leave around 6:30 AM. Crews are expected to arrive back to the site at/around 2:30 PM and leave by 3:30 PM. Administrative/Office staff will be on site the full day, but the work hours for these staff members will be 9 AM – 5 PM. A single mechanical staff member will also be on site for the full day and has hours from 8 AM to 5 PM. The Applicant

anticipates staggered arrival and departure times, which is consistent with his current businesses and consistent with O’C&L’s understanding about how the landscape contracting business across the street operates.

**Comment 4:** The access point should be aligned with the existing access point opposite to the Proposed Development.

**Response:** As a result of receipt of this comment, OCL performed additional field surveying to identify the location of the access point to Great American Landscapes. That entrance is unpaved. The entrance has been shown on the design drawings. The entrance to the Romano site has been adjusted to be immediately across from the access point to Great American Landscapes.

**Comment 5:** Please dimension the driveway width and curb radii.

**Response:** All drive aisles, parking areas, curb radii, and other relevant layout elements within the parking area have been dimensioned, per request.

**Comment 6:** Please minimize the width as much as possible, following Fire and Rescue Department requirements.

**Response:** The main drive aisle widths on entry to the site has been minimized. OCL has used 20’ as a minimum width for a drive aisle. The adjustment of the entrance location, as requested in Comment 4, has necessitated a curvilinear entrance which has in turn required adjustment to the width of the entry point in certain locations to ensure an emergency vehicle apparatus. OCL has balanced this comment and the need for safe access. Please be advised that the soils on site have largely guided the location of the septic area, and thus the overall design of the site, so the ability to make site layout adjustments to the buildings, septic area, or stormwater management area is limited.

**Comment 7:** Please refer to MCDOT comments from driveway standards and specifics.

**Response:** The MCDOT comments were issued in 2021 and have been addressed, where appropriate, to guide the design of the site.

**Comment 8:** Parking requirements > Section 6.2.4. > Nursery (Wholesale) – A minimum of 19 parking spaces seems to be required.

**Response:** A total of 22 on-site parking spaces are proposed; one of these spaces is designed to be a van accessible ADA parking space, as shown on the drawing.

**Comment 9:** Please dimension all parking spaces in the drawing, including the ADA Space.

**Response:** Dimensions for all parking spaces – including the ADA space and access aisle – have been added to the drawing.

**Comment 10:** Comus Road is classified as a County Connector with a master planned right-of-way of 80 feet, under the Master Plan of Highways and Transitways.

**Response:** Comment noted. See response to Comment 11, below.

**Comment 11:** Please dedicate 40 feet of right-of-way from the property line to the centerline of the existing pavement.

**Response:** The Owner has proposed to dedicated suitable right-of-way such that there is 40’ from the existing centerline of the road to the Owner’s property line. The area of dedication is shown on the Proposed Conditions plan, and the overall amount of square footage to be dedicated is shown in the legend on this plan.

**Comment 12:** Per the Complete Streets Design Guide, provide the following design parameters for Comus Road:

- Sidewalk, 6-foot-wide – please dimension on the drawing
- Street buffer, 10-foot-wide – open section, please refer to MCDOT standards for drainage and swale design requirements.
- Maintenance buffer, 2-foot-wide
- According to Complete Street Design Guide, the required bicycle facility for this street is either a 6-foot-wide Bikeable Shoulder or an 8-foot-wide Sidepath.
- MNCPPC and MCDOT are in agreement to require the Applicant either facility, that best aligns with the Applicant. Please provide a street cross-section to show how the bicycle facility would work.

**Response:** The revised layout shows a Complete Streets layout meeting these parameters. In particular, the existing paved surface is wide enough to accommodate the lane. The Owner is proposing a 10' street buffer, 8' wide asphalt sidepath (which shall serve pedestrians and bicyclists) and a 2' wide maintenance buffer. Each of these individual elements will fit within the public right-of-way following dedication. This layout is shown on the updated plan.

**Comment 13:** I-270 is classified as a Freeway with a master planned right-of-way of 300 feet, under the Master Plan of Highways and Transitways.

- Please dedicate 150 feet of right-of-way from the property line to the centerline of the existing pavement.

**Response:** Comment noted. The Owner has not agreed to dedicate any right of way on the I-270 side of the project at this juncture but does note that the subject property is designed such that he can accommodate the dedication if this is required by staff at the Preliminary Plan/Platting stage. The Plan identifies the potential area of dedication to achieve a 150' ROW from the center of I-270 – this is consistent with the dedication from the Garden of Remembrance to MDSHA when the Garden of Remembrance property was platted in 2000 as part of Plat #21684.

**Comment 14:** Please provide a cross-section for both Comus Road and I-270.

- Please include, label, and dimension all design parameters required per the Complete Streets Design Guide.

**Response:** The cross-section for Comus Road has been added to this plan based on this comment, the Complete Streets updates made to this plan as a result of Comment 12, and OCL's supplemental field surveying work. As discussed, field-surveying I-270 is unsafe and is not realistic, and access to I-270 is denied. To accommodate this comment, OCL obtained drawings from the MDSHA showing this area of I-270, has snipped the cross section from these drawings on to the plan, and has added the area of potential dedication (with field-run topographic information) to show a suitable cross-section. It is important to note that there are no significant improvements in/around I-270. Both Cross Sections are on new Exhibit 11Q.

**Comment 15:** The Bicycle Master Plan has no recommendations for Comus Road and I-270.

**Response:** Comment noted. The sidepath shall accommodate bike traffic in this location.

**Comment 16:** Please refer to the Fire and Rescue comments from Marie LaBaw regarding access and circulation, as well as entrance and exit configuration and adequacy.

**Response:** Fire and rescue comments were incorporated into the redesign of the entrance. An

updated Fire Access Plan has been submitted to Dr. LaBaw.

**Comment 17:** Please include a circulation exhibit showing motor vehicle access to the Proposed Development.

**Response:** The requested circulation exhibit – showing proposed circulation for a typical passenger vehicle and a passenger vehicle with a boat trailer (to simulate a truck with a trailer) – has been submitted to Staff with this resubmission. The Circulation Plan is filed as Exhibit 11O.

**Comment 18:** Please refer to MCDOT comments for sight distance requirements and form submittal.

**Response:** The fieldwork for a sight distance analysis was conducted by OCL field personnel in April 2025 based on current MCDOT parameters. Only horizontal road approaching vehicle sight distance was evaluated at this time. The results of the sight distance evaluation are included as Exhibit 11N. The Measured site distance to the right was acceptable. The measured sight distance to the left was not considered acceptable based on current AASHTO Intersection Sight Distance requirements.

OCL notes that existing vegetation on site was limiting in terms of performing this sight distance evaluation, and anticipates that the removal of this vegetation which will be necessitated by installation of the sidepath. It is OCL's opinion that the sight distance will be suitable upon completion of this clearing. Consequently, OCL requests that Staff approve the sight distance evaluation at this time and allow for a re-evaluation once clearing is underway.

**Comment 19:** Design all access points and alleys to be at-grade with the sidewalk, dropping down to street level between the sidewalk and roadway.

**Response:** All access points have been designed to be at grade with the sidewalk and the roadway. A new culvert shall be installed below the driveway.

#### Plan Comments: Environmental:

**Comment 1:** See comments on the Forest Conservation Plan in ePlans.

**Response:** Forest conservation plan comments were addressed by Norton Land Design and updated plans have been resubmitted to Environmental Planning staff for review.

#### Plan Comments: Conditional Use

**Comment 1:** Provide an update on the Fire Department Access Plan approval.

**Response:** As noted in Comment 16, an updated Fire Access Plan has been prepared based on the updated entrance location, driveway realignment, and comments issued by Dr. LaBaw prior. This plan was filed with Dr. LaBaw via electronic mail on July 8, 2025.

**Comment 2:** The ADA parking space needs to be a van accessible space.

**Response:** The subject ADA space has been amended to be van accessible, and a new label has been added to the plan showing this space as an ADA Space, which the "VA" terminology to identify it as van accessible. Relevant parking notes/tabulations have been amended as needed.

**Comment 3:** The Land Use and Zoning Report includes a request for Alternative

Compliance for the parking lot islands and tree canopy, however the Conditional Use Plan, Lighting & Landscaping Plan and the Fire Department Access (FDA) Plan all show the islands and trees. This seems to be in conflict with each other.

**Response:** The Alternative Compliance request has been reduced significantly. The only remaining Alternative Compliance request is for parking lot screening on the western and eastern property lines – all other requests have been removed.

**Comment 4:** The request for Alternative Compliance along the south property line for screening will be an issue if the only screening is the future street trees. Street trees cannot be used as screening because they will be in the public right-of-way and could be removed at any time by the County. There appears to be ample room between the street and the parking lot to be able to screen the site and not have an effect on the operations of the Landscape Contractor.

**Response:** This request for Alternative Compliance has been removed entirely. Screening along the south property line shall be provided.

O'C&L has coordinated to have multiple exhibits that have been filed with this Application to be updated as a result of the comments listed herein. Please find updated versions of the following exhibits included with this submission:

- Exhibit 3/Exhibit 10 – Statement of Justification and Operations
- Exhibit 7 – Traffic Statement
- Exhibit 8A – Ex. Conditions Plan (augmented with additional topography and information from across Comus Road)
- Exhibit 9 – Utility Plan
- Exhibit 11A – Proposed Conditions Plan
- Exhibit 11J – Forest Conservation Plan
- Exhibit 11K – Equipment Storage Exhibit
- Exhibit 11L – Fire Access Plan
- Exhibit 11M – Landscape and Lighting Plan
- Exhibit 13A – Land Use and Zoning Report

In addition, the following new exhibits are included with this submission:

- Exhibit 7A – Transportation Adequacy Form
- Exhibit 11N – Sight Distance Analysis
- Exhibit 11O – Circulation Plan
- Exhibit 11P – I-270 As-Built Plans, Area of Site
- Exhibit 11Q – Comus Road and I-270 Cross-Sections

If additional information is required, feel free to contact our office. Please let me know if you have any questions or require additional information. I can be reached at (301) 924-4570 or at [doug@oclinc.com](mailto:doug@oclinc.com). Thank you very much.

Very Truly Yours,  
O'Connell & Lawrence, Inc.



Doug Tilley, P.E., R.P.L.S.  
Vice President of Engineering and Surveying