

Exhibit 33  
LMA H-157

February 14, 2025

MNCPPC – Montgomery County Planning Department  
Midcounty Planning Division  
2425 Reedie Drive, Floor 14  
Wheaton, MD 20902

Re: Paramount Self Storage  
CU202501, H157, & F20240710  
MHG Project No. 2023.120.12

Dear Troy Leftwich:

The following is a point-by-point response letter to staff comments provided as a part of the Paramount Self Storage CU202501, H157 and F20240710 applications provided on February 13, 2025.

**Area Planning Comments:**

1. Since the project cannot provide the full sidewalk in the right-of-way due to the overhead utilities the applicant must dedicate the area needed. This will require a preliminary plan.

**Response: MNCPPC Planning Staff and MCDOT confirmed that they will support a PIE and PAE for the portion of the sidewalk along Paramount Drive not contained in the right-of-way, in lieu of additional dedication.**

2. Due to the sight distance by MCDOT comment no.7, Planning Staff cannot support alternative compliance. Please address MCDOT's concerns or adjust the plans to remove the access point onto Somerville for each phase.

**Response: MCDOT will review the sight distance evaluation, which proposes restricted parking to accommodate the required sight distance, to confirm whether the proposed parking restrictions are adequate.**

3. The LOD needs to reflect offsite improvements per MCDOT comments.

**Response: Comment acknowledged.**

4. Show location of the utility poles (plans only show wire lines) and work with Staff on a better location for the sidewalk if dedication is to occur.

**Response:**

5. Work with staff on the resubmit timeline and schedule with the hearing examiner

**Response: Comment acknowledged.**

6. Design Comment – “At the time of site plan application, Staff will work with the applicant to enhance the front elevations along the two major streets to help activate the streetscape and reduce the amount of blank walls.”

**Response: Comment acknowledged.**

7. Approval Letters needed at the time of Site Plan (please provide any now if feasible):

- DPS - Stormwater Management
- Fire Recuse
- MCDOT
- MCDPS

**Response: MCDPS SWM approval letter has been provided. Remaining agencies approval letters will be provided at the time of site plan.**

#### **Area Transportation Comments**

1. Please see MCDOT comments about filling the existing roadside ditch around the proposed driveway on Paramount Drive, including filling the ditch further south within the ROW.

**Response: MCDOT confirmed this condition will be reviewed at site plan with the storm drain analysis.**

2. The sidewalk along Paramount Drive can end at the ADA pedestrian crossing location rather than extending it to the property line so there is a clear route for users to cross the road rather than ending the sidewalk with no receiving sidewalk at the property line.

**Response: The new sidewalk along Paramount Drive now ends at the ADA pedestrian crossing location.**

3. We do not support alternative compliance given the concerns that MCDOT has raised about sight distance issues for the proposed access on Sommerville Drive. Further justification is needed to support a second access, including how the access will maintain a clear sight distance, particularly given the existing on-street parking behavior at this location.

**Response: MCDOT will review the sight distance evaluation, which proposes restricted parking to accommodate the required sight distance, to confirm whether the proposed parking restrictions are adequate.**

4. Please explain why the driveway on Paramount Driveway cannot be fully aligned with the driveway located on the opposite side of the roadway. The response to this comment was that it was aligned to the maximum extent feasible. However, it is not clear what makes further alignment infeasible? Is it due to utility locations, grading, etc.?

**Response: The driveway center lines are slightly offset to avoid the existing utility pole (to remain) on the south side of the new entrance. In coordination with the applicant MCDOT confirmed they would support the current driveway alignment, with the offset of the driveway centerlines, given the low traffic generation rates associated with the planned use on the subject property. Also, the driveway for the property across the street is a private road with no thru traffic or truck allowed.**

5. It appears that the street buffer width along Paramount Drive pinches down. Please provide the dimension of the minimum street buffer width and please provide an explanation as to why the street buffer width cannot be kept the same width the length of the frontage. Is this due to utilities?

**Response: A small reduction of street buffer width along the Paramount is required to accommodate the existing utility pole to remain between the property line and new sidewalk. The street buffer at this location has been dimensioned and is approximately 5-feet wide.**

6. The sidewalk along Paramount Drive appears to not be fully contained within the ROW. The preference is to have the full sidewalk width contained within the ROW where feasible rather than in a PIE.

**Response: MNCPPC Planning Staff and MCDOT confirmed that they will support a PIE and PAE for the portion of the sidewalk along Paramount Drive not contained in the right-of-way, in lieu of additional dedication.**

7. Please remove the curb ramp at the intersection of Sommerville Drive and Paramount Drive. There is no receiving ADA ramp on the opposite side of the road and there is no connecting sidewalk.

**Response: The curb ramp at the intersection of Somerville and Paramount Drive has been removed.**

**MCDOT Comments:**

1. Paramount Drive:

- Per the Masterplan of Highways, this roadway is classified as a TownCenter Street, with a proposed right-of-way of 70 feet and 2 travel lanes.
- Dimension the right-of-way and provide a roadway cross-section to include a street buffer and a default 10-ft sidewalk.
- The roadside ditch south of the proposed driveway should be filled in entirely, including the one extending into the adjacent property and on the other side of the existing driveway (adjacent property) within the right-of-way.
- The proposed sidewalk should be extended and connected to the existing sidewalk across the street with handicap ramps.

**Response: Roadway dimensions and cross-section have been included and will also be provided at site plan. MCDOT confirmed that the roadside ditch / drainage would be reviewed at the time of site plan with the storm drain analysis. The sidewalk has been extended, and new ADA ramps are proposed to provide a connection to the sidewalk across the street.**

2. Somerville Road:

- Per the Masterplan of Highways, this roadway is classified as TownCenter Street, a proposed right-of-way of 80 feet with 2 travel lanes.
- Dimension the right-of-way and provide a roadway cross-section to include a street buffer and a default 10-ft sidewalk.

**Response: Comments acknowledged. Roadway cross-sections with dimensions have been included and will also be provided at site plan. Refer to sheets CU202 and FZ202.**

3. The plan shows a portion of the sidewalk near the proposed driveway on Paramount Drive outside the right-of-way. If additional dedication is required to include the sidewalk in the right-of-way, then the applicant shall provide the necessary dedication.

**Response: MNCPPC Planning Staff and MCDOT confirmed that they will support a PIE and PAE for the portion of the sidewalk along Paramount Drive not contained in the right-of-way, in lieu of additional dedication.**

4. Per the Master Plan, the proposed streets in the Metro South neighborhood (B-9) could be public or private streets or linear open space. We agree with MNCPPC that a linear open space would comply with the master plan and defer to them for comments.

**Response: Comment acknowledged.**

5. Is the applicant undergrounding the utilities along the frontage?

**Response: The applicant is not proposing to underground utilities.**

6. Paramount Drive: The centerline of the proposed driveway shall align with the centerline of the existing driveway across the street. The existing guy wire could be relocated to align the driveway

**Response: Based on further coordination with MCDOT staff it was determined that the current driveway alignment, with the offset of the driveway centerlines, is acceptable based on the low traffic generation rates associated with the planned use on the subject property and that the driveway for the property across the street is a private road with no thru traffic or truck allowed.**

7. The sight distance is an issue due to the parked vehicles along the roadway for both the proposed driveways. Submit a completed, executed MCDOT Sight Distances Evaluation certification form for all existing and proposed site entrances onto County-maintained roads for our review and approval.

**Response: a Sight distance evaluation has been provided for MCDOTs review. The applicant is proposing restricted parking to accommodate the required sight distance.**

8. Submit a storm drain study for the portion of the subject site draining to the Montgomery County public storm drain system.

**Response: A storm drain study has been included and will also be provided at sight plan.**

9. TDM provisions of County Code 42A-26 apply to this development application. As per the county code, an owner or applicant for a development located in a District in a Red Policy Area must submit a Level 3 Project-based TDM Results Plan for a project with more than 40,000 gross square feet (gsf). The Paramount Self Storage LLC project, located in the Greater Shady Grove TMD and Red Policy Area, proposes to develop more than 40,000 gsf. The Project includes approximately 282,040 total square feet and is expected to have up to 2 employees on-site at any given time and as demonstrated on the Traffic Statement, the Project will result in fewer than 50 net new peak hour person trips (as compared to the existing conditions). In view of this fact, as cited in the TDM provisions of County Code 42A-26 (b) (5), a project with a gross square feet size disproportionate to its impact on traffic (e.g. large floor area warehouses with lower impacts) may be required to adhere to a Project-based TDM Plan Level lower than otherwise required by its size and location. Hence, we are recommending a Level 1 TDM Basic Plan subject to the approval of the MCDOT director.

**Response: Comment acknowledged. A plan will be submitted prior to building permit issuance.**

10. A Level 1 Basic Plan must include the following:

- Appointment of Transportation Coordinator (a person to work with MCDOT and TMD representatives to assist with the Department's efforts to achieve the NADMS and other commuting goals)
- Notification of the Transportation Coordinator's contact information and any changes to the information.
- Access to the Project (owner must provide space on-site by prior arrangement with MCDOT or TMD representatives to allow the Department to promote TDM)
- TDM Information (TDM-related information must be placed in a location visible to be displayed in a location(s) visible to employees and other project users.)

**Response: Comment acknowledged. A plan will be submitted prior to building permit issuance.**

11. The Plan must be submitted to and approved by MCDOT prior to issuance of any building permit by the Department of Permitting Services. The Applicant shall coordinate with MCDOT Commuter Services Section (CSS) staff: Samuel Damesa at [Samuel.Damesa@montgomerycountymd.gov](mailto:Samuel.Damesa@montgomerycountymd.gov) or (240) 777-8384 and James Carlson at [James.Carlson@montgomerycountymd.gov](mailto:James.Carlson@montgomerycountymd.gov) or (240) 777-8382 to implement the aforementioned recommendations of the Transportation Demand Management (TDM) plan for the new development project.

**Response: Comment acknowledged. A plan will be submitted prior to building permit issuance.**

12. If a Preliminary Plan is required, pay the Montgomery County Department of Transportation plan review fee in accordance with Montgomery County Council Resolution 16-405 and Executive Regulation 28-06AM ("Schedule of Fees for Transportation-related Reviews of Subdivision Plans and Documents").

**Response: MNCPPC staff confirmed no preliminary plan will be required.**

13. Design all access points and alleys to be at-grade with the sidewalk / sidepath, dropping down to street level between the sidewalk / sidepath and roadway.

**Response: Access points are designed to be at grade with sidewalk, dropping down to street level between the sidewalk and the roadway.**

Re: MedImmune

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14. The applicant is responsible for relocating utilities along existing roads to accommodate the required roadway improvements.

**Response: The applicant is not proposing to underground utilities.**

Sincerely,

Dylan Macro