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April 1, 2025

Via Electronic Mail

Mayor Jud Ashman and Members of the City Council
John Bauer, Planning Commission Chair and
Members of the Planning Commission
City Hall
21 South Summit Avenue
Gaithersburg, Maryland 20877

Re: 10003 and 10009 Fields Road – SDP-9896-2024

Dear Mayor Ashman and Members of the City Council and Chair Bauer and Members of the Planning Commission:

On behalf of WLR Automotive Group, the Applicant of the above-referenced Schematic Development Plan (the “SDP”), we appreciate being able to present to you the SDP for the proposed carwash at 10009 Fields Road which included the minor revisions to the 10003 Fields Road site (collectively the “Property”) at the recent joint hearing on March 17, 2025. We want to take this opportunity to further elaborate on the questions raised during the public hearing and provide additional related information that may be helpful to the City as you evaluate the requested SDP.

I. Specific Questions Identified by Planning Staff

Planning Staff asked us to respond to the following questions:

• **What is the throughput for the existing and proposed carwash?**

According to the representative of the Property owner (PMG Mapp, LLC, “Owner”), the current carwash has averaged 35 car washes daily thus far in March 2025. The Applicant’s anticipated throughput for the proposed carwash, based on data from its other similarly situated establishments, is an average of 51 carwashes Monday through Friday (with 20 in the morning and 31 in the afternoon) and 49 carwashes on Saturdays and Sunday.

• **Did the marketing efforts include restaurant uses?**

During the public hearing, we stated that KLNB, the firm marketing the 10009 Fields Road site for the past five years, received no interest or offers for office use and only a few anemic expressions of interest for retail use. It was unclear to me at the time whether this retail

interest included restaurant users. We have confirmed with the Owner that they received only three letters of intent; one for a bank, one for a drive-through restaurant, and one for a casual restaurant. The Owner reiterated that none of the letters of intent were economically feasible or sustainable.

During the joint hearing, several Councilmembers and Planning Commission members expressed concern over the amount of traffic that the proposed carwash would generate. It is important to emphasize that a drive-through restaurant would generate more morning and evening trips than the carwash. Moreover, while the morning trips generated by a 7,000 square foot casual restaurant are slightly less than the carwash, the evening trips are similar. The fact that the trip generation for a restaurant is comparable to the proposed carwash use is important and is discussed in more detail below.

- **Is it possible to not allow left turns from Fields Road into the site?**

Precluding left turns from Fields Road into the Property would significantly restrict Property access and threaten the viability of the existing gas station, convenience store, lube center and restaurant located at 10003 Fields Road. As indicated by Attachment A, eliminating the left turns in would force customers coming from Sam Eig Highway or eastbound Fields Road to travel out of their way to make the right turn into the Property by either: 1. making a U-turn at the intersection of Fields Road and DeCoverly Drive (Route A) (the intersection of Fields Road at Rio Boulevard is closer, however U-turns are restricted, which could lead to illegal movements); or 2. proceeding along Washington Boulevard to Rio Boulevard to Fields Road (Route B). Either of these options creates a significant amount of unnecessary additional miles of travel (just under and over a mile) to the road network and raises potential safety concerns.

In addition, as indicated by the Traffic Impact Study that was conducted in accordance with the City's requirements and reviewed and approved by the City's transportation staff and the Montgomery County Department of Transportation ("DOT"), the quantitative data demonstrates that the proposed carwash use passes the City's transportation requirements and that the existing road network is adequate to accommodate the proposed use. However, in an effort to fully ensure that the road network is adequate, the Applicant did not simply rely on the approved Traffic Impact Study. The Applicant's transportation consultant also conducted a Highway Capacity Manual ("HCM") analysis that studied the traffic patterns and the delays in the nearby traffic. The HCM analysis provides additional evidence that the proposed use can be adequately served by the road network and will not negatively impact existing conditions. While we recognize that an individual's perception can often deviate from the quantifiable evidence, the hour by hour video available here [[Traffic Video](#)] that the Applicant's traffic consultant took at the intersection of Fields Road and the access into the Property, shows that there are more than adequate gaps in the traffic to accommodate additional left turns into the Property that will be generated by the carwash customers.

It is also important to emphasize that the previous restaurant at 5,885 square feet generated just 12 fewer PM trips than is anticipated by the carwash and there is no evidence to suggest that the traffic generated from this prior restaurant use caused any issues. With just 12 more

PM trips anticipated with the car wash use, it is expected that the activity in and out of the Property will be comparable to what existed before the restaurant was vacated. This further demonstrates that the road capacity is more than adequate to accommodate the proposed carwash.

- **Is it possible to allow right turns into the site from Washingtonian Boulevard?**

The Applicant's engineers evaluated the feasibility of adding a right turn into the 10003 Fields Road site from Washington Boulevard and determined that there would be adequate sight distance from the access point to the intersection to accommodate such an entrance. Unfortunately however, the addition of the entrance would require the wholesale redevelopment of the 10003 Fields Road site, given the location of the lube center and its operations (the northeast corner of the site provides a drive aisle for vehicles exiting the lube center) and the proximity of the other three uses on the site. As a result, at this time, such an access point is not feasible.

- **Is it possible to create a pedestrian path running plan north-south near the tennis courts from Washingtonian Boulevard to Fields Road?**

The Applicant understands the benefits that this potential mid-block pedestrian connection would provide to the nearby residents and visitors to the area and was hopeful that they would be able to accommodate this suggestion. However, as indicated by the attached site plan (Attachment B), the Property line is located just beyond the parking lot, immediately behind the curb and therefore the mid-block connection would need to be located on the adjacent residential property. With the goal of furthering this connection, the Applicant would agree to a condition that they will use best efforts to secure an easement to accommodate the pedestrian path from the adjacent property owner and assuming the easement is granted, they will construct a pedestrian connection extending from Washingtonian Boulevard to Fields Road.

II. Additional Information

A. The Use is Harmonious with Existing and Planned Land Uses

Zoning Ordinance Section 24-160D.10.(b)(4) requires a finding in the MXD Zone that the “plan will be internally and externally compatible and harmonious with existing and planned uses in the MXD zoned area and adjacent areas.”

During the hearing we explained that the proposed use was harmonious with the surrounding area in that the structure was a comparable size to the existing restaurant structure (the carwash structure is actually 779 square feet smaller); the project, with 42% green area, will provide a significant amount of landscaping and exceed the 25% requirement; more trees will be provided on the site than exist currently; the proposed use will improve the sidewalks along all sides of the peninsular shaped Property thereby enhancing the pedestrian experience and increasing safety; the project complies with all of the requisite zoning development standards; and the architectural design of the building is aesthetically interesting and pleasing (we noted

that there is no consistent architectural style in the area and the existing site is improved with a nondescript structure surrounded by surface parking). The fact that the anticipated trip generation of the proposed use is comparable to the former restaurant furthers the harmonious nature of the use.

The Applicant also noted that the proposed use provides the opportunity with the cooperation of Montgomery County DOT and working closely with the City to create a gateway entrance feature at the apex of the site highlighting the nearby Rio Center and/or Downtown Crown. Currently this under-utilized area is improved with nondescript landscaping and presents an opportunity to promote the City of Gaithersburg. (See Attachment C for a photo of the existing conditions and illustratives of the type of gateway feature the Applicant is considering).

The Applicant's basis for why the proposed carwash is harmonious and compatible with the surrounding area and satisfies the requirements of Section 24-160D.10.(b)(4), is consistent with the City's findings in other cases. A review of approved SDPs reveals that the City's basis for finding that a use is harmonious and compatible have included the following: 1. Project complies with the development standards and is within the maximum height limit (ASDP-8733-2020); 2. Project design creates a separate visual identity (SK-9497-2023); 3. Project provides additional sidewalk and streetscape improvements (SDP-9073-2021); and 4. Project consisting of retail, office and service station will be located within a mixed use community consisting of commercial, office and residential uses (SDP-8198-2019).

In contrast, in connection with the proposed daycare facility for Everbrook Academy (SDP-8551-2020), the proposed use was found not to be compatible and harmonious with the surrounding area because the square footage of the structure was significantly larger (12,900 square feet versus 6,000 square feet); the landscaping was not compatible; and the building siting was not integrated into the surrounding setting. In addition, in determining that the use was not compatible and harmonious with the surrounding area the Mayor and Council relied in part on the significant number of public comments that they had received opposing the project. Notably, the City has not received any public comment expressing concern about the proposed carwash. This in and of itself suggests that the use is compatible and harmonious with the surrounding location and that the location is appropriate.

B. Master Plan Compliance

Finally, we want to further address the issue of Master Plan compliance. During the hearing we stated that the specific land use recommendations for the Property are "commercial-industrial-residential-office" and that the carwash use fits squarely within the commercial use category.¹ We further noted that the language that followed the land use designation was suggestive, but that we nonetheless believed the car wash use was consistent with the suggested "highway convenience services" (an undefined term) use. We also highlighted the fact that the carwash on the 10003 Fields Road site was approved under the exact same Master Plan recommendations to which the proposed carwash is subject.

¹ A carwash is a permitted use in the MXD Zone by virtue of being a permitted use in the commercial C-2 Zone.

With respect to this last point, there was discussion as to whether the size of the carwash can influence the outcome of the Master Compliance finding. While we recognize that the proposed car wash anticipates a more robust business than the existing car wash on the neighboring property, it is important to emphasize that for purposes of evaluating compliance with the Master Plan, the Zoning Ordinance defines a car wash as a singular specific use (Zoning Ordinance Section 24-117(15)). The Zoning Ordinance does not create separate carwash use categories with criteria or standards that vary depending on size or operation. In contrast, there are certain other uses where the use is distinguished based on its size or other characteristics (e.g. a family day care facility for up to 8 children is a separate use than a family day care facility for more than 8 children but less than 12 children; restaurant uses are separated into several separate classifications: Class A, Class B, Class C, Hotel restaurant-full service, and Hotel restaurant-limited service; Hotels are separated into Hotel full service, Hotel, limited service and Hotel extended stay). Each of these variations is a separate use and a finding of Master Plan compliance for one is not evidence of Master Plan compliance for the other. For instance, a finding that a Hotel limited service complies with the Master does not mean that a Hotel full service is automatically compliant.

However, this is not the case for a carwash. The Zoning Ordinance simply provides for a blanket category of “carwash.” Therefore, to the extent that the City has found one carwash (i.e. (i.e. the car wash at 10003 Fields Road) on property in the MXD zone to comply with the Master Plan provisions (as a “commercial-industrial-residential-office” use, consistent with the “highway convenience services” recommendation), then the proposed carwash on MXD-zoned land that is subject to the same zoning and Master Plan provisions should also be found to comply with the Master Plan.

III. Conclusion

We appreciate the opportunity to respond to the specific questions that Planning Staff identified and to further elaborate on several of the additional issues that were discussed during the hearing.

Thank you for your consideration of this additional information.

Sincerely,



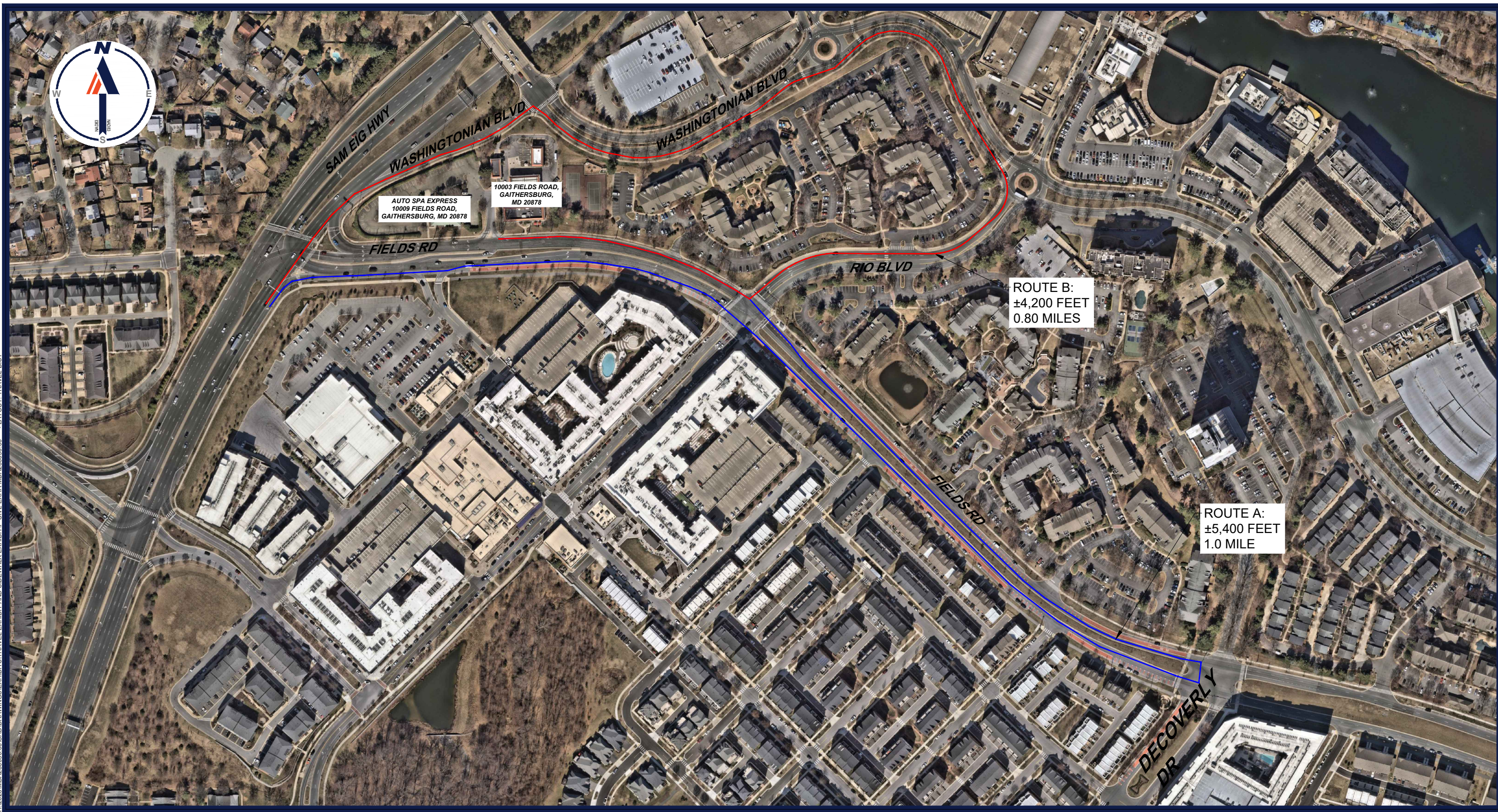
Patricia A. Harris

cc: Greg Mann
Jasmine Forbes
Sam Copelan

Encls.

Attachment A

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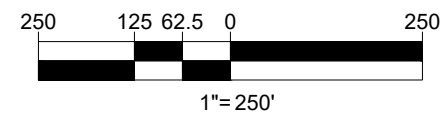
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**TRAVEL DISTANCE EXHIBIT
 AUTO SPA EXPRESS GAITHERSBURG**

GAITHERSBURG, MD 20878 | PLAN REV. 0

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Attachment B



WASHINGTONIAN BLVD

WASHINGTONIAN BLVD

AUTO SPA EXPRESS
10009 FIELDS ROAD,
GAITHERSBURG, MD 20878

10003 FIELDS ROAD,
GAITHERSBURG, MD 20878

PROP SIDEWALK
CONNECTION FROM
FIELDS RD TO
WASHINGTONIAN BLVD

FIELDS RD

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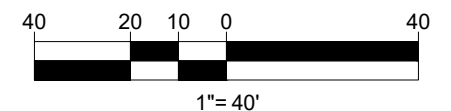
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SIDEWALK EXHIBIT AUTO SPA EXPRESS GAITHERSBURG

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Attachment C



Existing Conditions
10009 Fields Road, Gaithersburg



Illustrative Image No. 1 for Gateway Feature



Illustrative Image No. 2 for Gateway Feature



Illustrative Image No. 3 for Gateway Feature