

**From:** [Karen Knotts](#)  
**To:** [Lockard, Christopher](#)  
**Cc:** [Whitmore, Amanda](#)  
**Subject:** Public comment: Non-Governmental Utility Board of Appeals Case B-25-23  
**Date:** 04 November 2025, 16:24:22

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**[EXTERNAL EMAIL]**

Dear Commissioners,

I am writing to express my strong opposition to granting the application for a Special Exception for the proposed non-governmental utility that has been submitted to the Board of Appeals for construction of buildings at 12234 Old Frederick Road, Thurmont, MD. I live just a mile away from this property and have owned my home for 31 years. I vote at the historically registered St. John's Church and have spent countless hours along Old Frederick Road and Blacks Mill Road running daily errands, commuting to work, and riding my bike. This area is my home and it is one of the loveliest locations in Frederick County.

The 13-acre property in question is zoned Agricultural and is currently undeveloped and actively used for agricultural purposes. This project absolutely does not belong on this property. Farmland is a precious resource and there is no reason to sacrifice 13-acres of prime farmland already zoned agricultural and in active use for this purpose. The Town of Thurmont recently rejected this same project on just 7 acres and proposing to permanently destroy 13 acres of prime farmland makes even less sense!

This project is completely out of place on this property and in this location. Its purpose and use is ***NOT*** in harmony with the character and landscape of the surrounding area. It will destroy prime farmland, negatively impact a church that is on the National Register of Historic Places, ruin a key wildlife corridor that supports a wide diversity of wildlife that supports deer, bald eagles, foxes, and wild turkeys, just to name a few.

There is no overriding need to put this project on this property. Destroying small parcels of farmland is leading Frederick County to permanently lose what makes it such a unique and wonderful place. I urge you to reject this application for a project that has no place in this location.

Thank you,  
Karen Knotts  
8601 Hunt Club Road  
Thurmont, MD 21788

**From:** [Tracey Law](#)  
**To:** [Lockard, Christopher](#), [Whitmore, Amanda](#)  
**Subject:** public comment on Board of Appeals for construction of buildings at 12234 Old Frederick Road, Thurmont, MD  
**Date:** 04 November 2025, 17:13:08

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**[EXTERNAL EMAIL]**

Dear Commissioners,

I am writing this letter to express my firm opposition to the proposed special exception to grant a fiber optic facility in Creagerstown. I live about a mile from this proposed facility and feel its construction will alter the rural and history-laden feel of the region especially with the historic St. John's Lutheran Church and surrounding cemetery so close to the proposed site. I cycle to the Church and its surrounding grounds quite often and spend time soaking in the history that you can just feel when standing on the grounds. Looking out from the cemetery or standing on the road it takes no effort at all to picture what it felt like a century ago. This facility does not belong here. If the exception is granted our wonderful county will forever lose a unique opportunity for the residents to experience Creagerstown of the past. I will also mention it will be yet another loss of more agricultural land, more of our strong farming heritage once gone never to return.

These buildings and facility have no place here. They need to be constructed on land already zoned for business, leaving the farming and historical parcels of our county free to be enjoyed and treasured today and for future generations.

Thank you,  
Tracey Law  
8601 Hunt Club Road  
Thurmont, MD

**From:** [Elizabeth Comer](#)  
**To:** [Lockard, Christopher](#), [Whitmore, Amanda](#)  
**Subject:** Written remarks in advance of October 5 HPC meeting re 12234 Old Frederick Road  
**Date:** 04 November 2025, 09:00:03  
**Attachments:** [Remarks.docx](#)

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**[EXTERNAL EMAIL]**

Dear Beau and Amanda,

Attached please find written remarks to be shared with members of the Frederick County Historic Preservation Commission in advance of the October 5, 2025 meeting.  
Please let me know if you have any questions or need any additional information.

Thank you.

Elizabeth A. Comer  
8302 Stevens Road  
Thurmont, Maryland 21788

Cell 443-463-6437

Remarks to Frederick County Historic Preservation Commission concerning the proposed Old Frederick Road non-governmental utility development

Elizabeth Anderson Comer

The proposed non-governmental utility development consisting of three ca. 7600-square foot buildings on 13.09 acres of land zoned for agricultural use will constitute an adverse impact on the rural cultural landscape of the Creagerstown area including several National Register properties as well as the Creagerstown survey district (F-6-100).

In 1976, the ca. 1783 Strawberry Hill (F-6-48) located at 12155 Creagerstown Road (MD 550) and in 2015 the "St. John's Church at Creagerstown Historic District" (MIHP # F-6-134 and NPS 07000862) located at 8619 Blacks Mill Road, were determined eligible for listing on the National Register. The NR district includes both churches, the Creagerstown cemetery, and the old school across the road as well as a preservation easement with the Maryland Historical Trust. The NR nomination form for St. John's Church at Creagerstown Historic District specifically notes one of its character defining aspects: "Immediately beyond these town lots the land is agricultural, with very little modern development on the surrounding landscape."

The proposed development is clearly visible from the district and from multiple historic structures including the historic cemetery as demonstrated by the viewshed analysis.

The viewshed analysis calculated the height of the parapet walls for each building to be 24 feet 8 inches. This measurement was provided in the plans submitted to the county by Bogia Engineering, Inc. A jib crane, shown on the drawings, will extend an unknown height above 24 feet 8 inches. While we have repeatedly requested this measurement for the overall height of the jib crane, it has not been forthcoming. However, it will undoubtedly extend the zone of visual impact beyond that shown in the October 31, 2025 viewshed analysis report provided to you by the community.

The results of the analysis indicate that the National Register structures as well as the surrounding historic landscape will be adversely affected by this inappropriate construction on agricultural land.

Further, the adverse visual impact of these industrial structures cannot be adequately mitigated as the maximum average height of the vegetative screening listed (15-20') falls short of the 24'-8" noted as the maximum height of the proposed structures, and may take years to achieve, if ever.

Finally, the noise generated from the cooling fans will have an auditory adverse effect on the cemetery and surrounding landscape. While community research determined the average auditory level of the proposed facility fans will be significant, Bogia Engineering, Inc. has not provided this information or the level of additional noise levels associated with generators within the facilities. Although Bogia Engineering, Inc. asserts that planned sound attenuation measures will neutralize this noise, the community has reservations that the documented level of noise will be sufficiently mitigated by these measures.

I strongly encourage the HPC board to record a finding of negative impact on the historic and cultural resources including Strawberry Hill, St. John's Church, and the Creagerstown Survey District as well as the historic agricultural field system of rural Creagerstown.

**VISIBILITY STUDY FOR OLD FREDERICK ROAD  
LIGHTPATH FACILITY, FREDERICK COUNTY,  
MARYLAND**

**Report**

Prepared for:  
Frederick County  
Division of Planning & Permitting  
30 N. Market St.  
Frederick, MD 21701

by

**Robert Wanner and Patrick Kim**

**EAC/Archaeology, Inc.  
4303 N. Charles Street  
Baltimore, MD 21218  
410-243-6767**

**October 31, 2025**

## ABSTRACT

Bogia Engineering, Inc. is requesting approval from Frederick County to allow for a non-governmental utility consisting of three circa 7600-square-foot buildings on 13.09 acres of land zoned for agricultural use near the intersection of Old Frederick Road and Creagerstown Road in Thurmont, Maryland. The entire project is located within the Creagerstown Survey District (MIHP# F-6-100), a historic district which is eligible for the National Register of Historic Places (NRHP). EAC/Archaeology, Inc. (EAC/A) has conducted a visibility study of the buildings to determine how visible the buildings will be from St. John's Church at Creagerstown Historic District (MIHP# F-6-134), which is located within the eligible district and is also individually listed on the NRHP, as well as from other nearby NRHP-listed or -eligible properties. This visibility study has determined that all three buildings will be highly visible from the cemetery and church at St. John's Church at Creagerstown Historic District, and also from the yard and driveway of Strawberry Hill (MIHP# F-6-048) to the east. EAC/A recommends a full evaluation of these visual effects on both St. John's Church at Creagerstown and Strawberry Hill.

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## 1. INTRODUCTION

Bogia Engineering, Inc. is requesting approval from Frederick County to allow for a non-governmental utility consisting of three circa 7600-square-foot buildings on 13.09 acres of land zoned for agricultural use near the intersection of Old Frederick Road and Creagerstown Road in Thurmont, Maryland. The three proposed buildings are oriented in a line roughly north-south. The height of the parapet walls for each of the building is to be 24 feet 8 inches, though a jib crane is to project from the roof at an unspecified height. The entire project is located within the Creagerstown Survey District (MIHP# F-6-100), a historic district which is eligible for the National Register of Historic Places (NRHP).

EAC/Archaeology, Inc. (EAC/A) has conducted a visibility study to determine how visible the buildings will be from St. John's Church at Creagerstown Historic District (MIHP# F-6-134), which is located within the eligible district and is also individually listed on the NRHP, as well as from other nearby NRHP-listed or -eligible properties. This visibility study was performed based on data provided in Frederick County public hearing on October 23, 2025.

This report is divided into four sections, and presents the methodology and results for this archaeological investigation. Introductory information, including a description of the scope, purpose, and staff involved in the work is provided in **Section 1**. **Section 2** provides the methodology for the analysis. **Section 3** presents the results of the analysis. **Section 4** presents a summary of the results.

Robert Wanner, Ph.D. and Patrick Kim (EAC/A) served as the Geographic Information System (GIS) Technicians for this analytical report.

## 2. METHODS

EAC/A initially prepared a visibility analysis from three prominent observer points on the rooftops of the proposed buildings using ArcGIS Desktop 10.8. A viewshed, also known as a line-of-sight map, is developed using cells in an elevation model (raster data) and observer points (vector data). A straight line is interpolated between the source (observer point) and every other cell within the elevation model. If the height of cells along this line exceeds the height at the source, the line of sight is interrupted.

High-resolution Digital Elevation Models (DEMs) were the primary tools used to conduct this study. These were derived from Light Detection and Ranging (Lidar) surveys, which employ sensors which provide high-resolution, three-dimensional (3-D) geospatial data. Lidar is a remote sensing method that uses light in the form of a pulsed laser to measure ranges (variable distances) to the earth. These light pulses—combined with other data recorded by the airborne system—generate precise, three-dimensional information about the shape of the earth and its surface

characteristics. One of the most celebrated features of this laser scanning is “canopy penetration”, where the sheer density and resolution of point data acquired usually guarantees that some of the points represent the surface of the ground below tree cover especially if taken during fall or winter months in temperate areas. Maryland provides raw Lidar data acquired in 2012 and 2021 for all its counties for free.

Following acquisition of the Lidar data, EAC/A used Blue Marble Global Mapper with Lidar Module to create a DEM, with a resolution of 50 centimeters (1.64 feet), reflecting current conditions, including buildings and roads – also known as a digital surface model (DSM). Following that, we created a new DEM which added the proposed building footprints to the existing surface, reflecting the conditions after the construction is completed (**Figure 1**). As indicated in the information supplied to EAC/A, the top of the parapet wall of the building will be at 24 feet 8 inches feet above the ground. Once this new DEM was created, EAC/A added three observer points on the roofs of the buildings to replicate visibility. A height of 1.52 meters (five feet) was added to the ground surface to replicate the average height of a human. This created an initial viewshed which prompted further questions and analysis.

The subsequent viewsheds discussed below were classified based on the frequency of visible observation points. Areas from which one point were visible were classified as “visible”, from which two points were visible were classified as “more visible”, and from which all three points were visible were classified as “most visible”. Results from the St. John’s Church at Creagerstown Historic District visibility analysis were subject to ground truthing.

### 3. VISIBILITY ANALYSIS

The initial visibility analysis, which relies on observation points from the rooftops of each of the three proposed buildings at the Old Frederick Road Lightpath facility, suggests that the buildings will be a highly visible feature of the landscape along from the east and west, though topography, buildings, and vegetation appear to block more expansive views from the north and south (**Figure 2**). The viewshed of the buildings includes areas of two properties which are listed on the NRHP: St. John’s Church at Creagerstown Historic District (MIHP# F-6-134) to the north and Strawberry Hill (Kolb Farm) (MIHP# F-6-048) to the east. We also note that a substantial portion of the Creagerstown Survey District (MIHP#F-6-100), which is eligible for the NHRP, falls within the viewshed. Speak-Baker Farm (MIHP# F-6-149) also falls within the viewshed, but was determined not eligible for the NRHP in 2015.

This initial analysis posed a question of how visible the proposed buildings would be from the NRHP-listed properties. To test this, we established three observer points within each of the properties, with an offset of five feet to reflect a person standing at these points, and ran the visibility tool two more times.



Figure 1: Digital Surface Model (DSM) used for visibility analysis

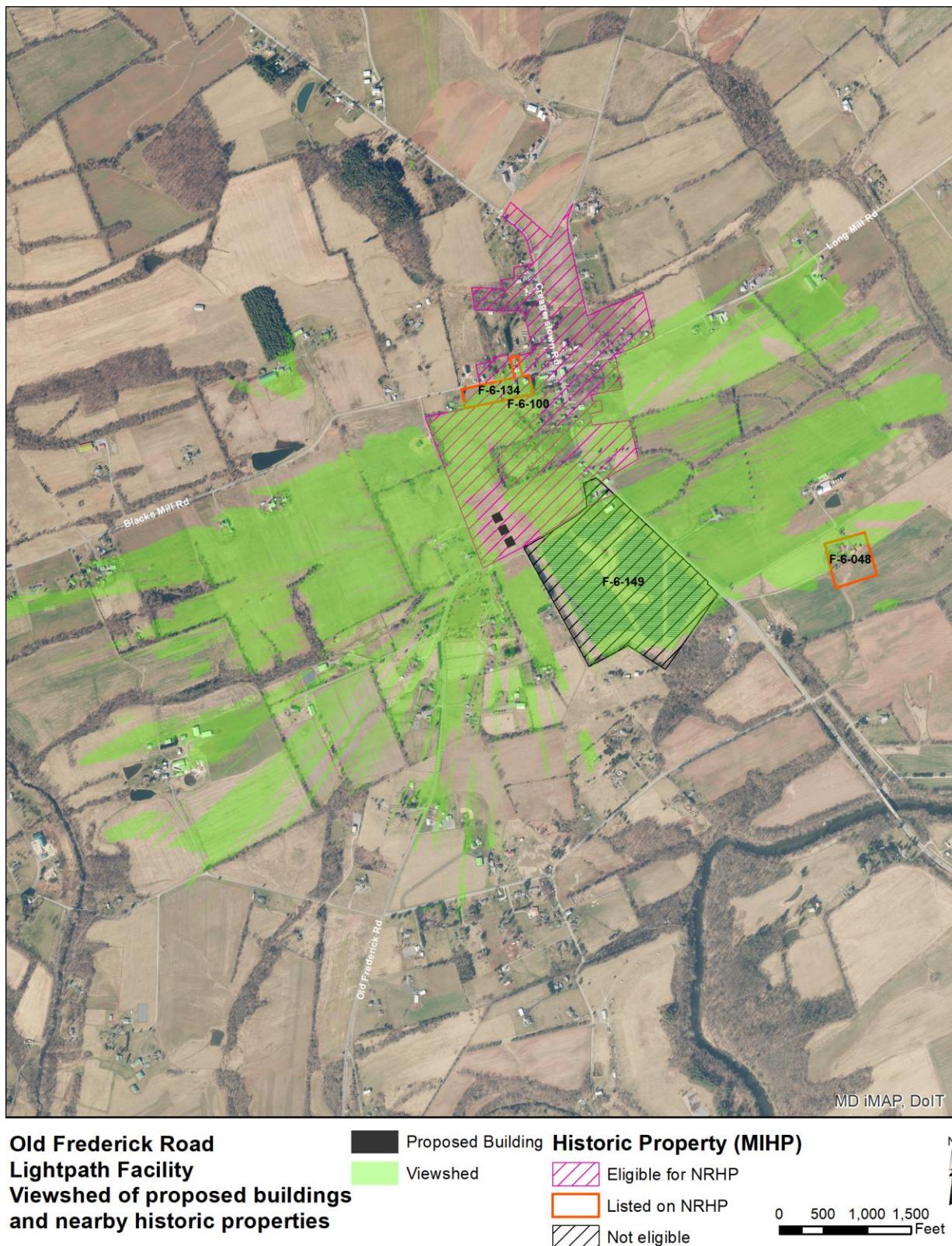


Figure 2: Viewshed of proposed buildings within one mile

The observer points at St. John's Church were set from the Creagerstown Cemetery, from a point between St. John's Lutheran Church (1908) and St. John's Reformed Church (1834), and from the brick Creagerstown School No. 2 (ca. 1880) on the north side of Blacks Mill Road. The results of this visibility analysis indicate that the two northernmost buildings will be visible from both the cemetery and from the area surrounding the churches, but not from the Creagerstown School building on the north side of Blacks Mill Road (**Figure 3**). The north and east façade of the northernmost building would be the most visible elements. The east façade of the southernmost building would be visible from different points throughout the property, but less so than the other two buildings.

The results of this analysis were subjected to ground truthing. A photograph taken from the cemetery on October 28, 2025 confirm that individuals standing within the western end of the Creagerstown Cemetery will have an unobstructed view of the buildings (**Figure 4**). A photo taken from the bell tower of St. John's Reformed Church on October 30, 2025, confirms that the buildings would be visible from both within the bell tower and from most of the area surrounding the church on its east, west, and south sides (**Figure 5**).

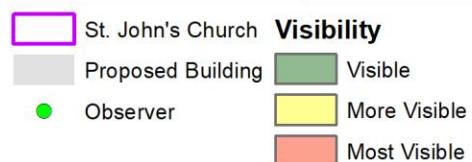
At Strawberry Hill, two points were selected along the driveway and another from the front of the main 1783 Georgian farmhouse. The eastern and southern façades of these buildings will be visible from all three of these points, though the southern one less so than the other two (**Figure 6**).

## 4. SUMMARY

The visibility analysis indicates the two to three of the proposed Old Frederick Road Lightpath facility will be visible from St. John's Church in Creagerstown Historic District and Strawberry Hill (Kolb Farm), which are historic properties listed in the NRHP. From the cemetery and the church buildings within St. John's Church in Creagerstown Historic District, on the south side of Blacks Mill Road, the two northernmost buildings in the facility will be visible. From points along the driveway and from the yard area of Strawberry Hill, within the northern half of the property, all three buildings will be visible. A full evaluation of these visual effects on the character-defining features of these properties is warranted.



**Old Frederick Road  
Lightpath Facility  
Visibility of proposed buildings  
from St. John's Church at  
Creagerstown Historic District**



0 200 400 Feet

N



**Figure 4: Photo of view toward proposed building location from west end of Creagerstown Cemetery (photo by Elizabeth Comer)**



**Figure 5: Photo of view toward proposed building location from bell tower of St. John's Reformed Church (photo by Steve Wobbleton)**



Figure 6: Visibility of proposed buildings from Strawberry Hill, an NRHP-listed historic property