

James, Karen

From: Planning Commission
Sent: Tuesday, November 9, 2021 8:13 AM
To: Nancy Izant
Cc: Brandt, Kimberly G.; Goodfellow, Tim
Subject: RE: Sugarloaf Area Plan comments

Good morning:

Thank you for taking the time to express your thoughts on the Sugarloaf Treasured Landscape Management Plan.

Your comments will be shared with the Planning Commission for their consideration.

Karen L. James
Administrative Specialist
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Frederick County Government
30 North Market Street
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301-600-1138

From: Nancy Izant <nizant@toast.net>
Sent: Monday, November 8, 2021 10:21 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Cc: Gardner, Jan <JGardner@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: Sugarloaf Area Plan comments

[EXTERNAL EMAIL]

To: Frederick County Planning Commission; Frederick County Council; County Executive

I am very interested to hear a serious discussion among the Frederick Planning Commissioners, at their Nov 10th meeting, concerning the boundaries of the Sugarloaf Area Plan as it relates to the very real hazard of flooding. Any further development on the South West side of I270 will include roofs, pavement, asphalt and cement resulting in increased rain runoff into Bennett Creek.

The Frederick County Hazard Mitigation Plan for 2021 ranks the risks of flooding and flash flooding as HIGH and features a photo of a flooded intersection on the cover of the last presentation. The intersection of Peters Road and Roderick Road is designated by FEMA as in a flood plain area. How many times has the intersection of Peters Rd and Roderick Rd been closed due to flooding? I and my neighbors can tell you that it is multiple times per year. The flooding at the Peters / Roderick 'intersection' will become even worse if development is allowed west of I-270. The County Planners have recommended cistern updates to fight potential forest fires on Sugarloaf Mountain due to climate change and it is commendable that they had the foresight to address this real potential disaster. But, in the Frederick County Hazard Mitigation Plan, for 2021, the risks of serious flooding ranks much higher than forest fires. So, in one sense, there had been some consideration of climate change for fires, but why not in regard to the boundary line of Sugarloaf Area Plan, where increased runoff would result? Why are county planners considering one aspect of climate change and not an even more likely hazard?

The community off of Roderick Rd cannot afford any more flooding at the Peters Rd intersection in the flood plain. There is only one way in and one way out of the community for over 200 homes and any blockage of Roderick Rd that transpires, sends cars down to rural Peters Rd, right next to Bennet Creek. That is a dangerous situation and has already occurred, many times. A few years ago in our neighborhood, a home was struck by lightning, caught fire and seriously injured the homeowner, who later died. In it's response, the fire department blocked off Roderick Rd to residents who were making their way home in the dark and in the pouring rain. Many of those cars turned around and detoured to travel Peters Rd. One of them was my husband, who had that harrowing experience. Fortunately, the Peters / Roderick intersection was not yet to flood stage, but it easily could have been. As hazardous as this sounds, it is not unusual. This is only one example of numerous similar situations that have taken place over the past 21 years of our residence here. These are real, conceivable hazards, which you have the power to mitigate, by deciding to protect the western side of I-270 from any development which will result in increased flooding.

A paragraph in the Draft Plan (on pg 43) provides an interesting insight into staff thought process: "As improvements to the transportation function of I-270 are completed in future years, the County cannot afford to summarily dispense with limited growth opportunities on the western side of the highway right-of-way in the vicinity of the MD 80 interchange." I would like to point out that making the assumption that 'development growth' = 'opportunity' is very biased in the direction of developers and is not necessarily good for the community and certainly not the environment. It seems in direct contrast to The Livable Frederick County plan which includes Maryland's 12 Planning Visions. The first is: "1) Quality of Life and Sustainability: A high quality of life is achieved through universal stewardship of the land, water, and air resulting in sustainable communities and protection of the environment." So why isn't protection from development seen as opportunity? Their statement is wrong-headed thinking, short-sighted and poor framing that seems to be built into the planning system. But it doesn't have to be. You can turn this around and see through the language used to frame the situation. You have a real opportunity to add a layer of protection to precious and ever dwindling undeveloped areas.

Additionally, do you really want to see development next to or across from a Civil War battlefield? This would be, not only a travesty, but an embarrassment to Frederick County. Tourists come from miles around to view and attempt to understand what occurred there, in the 1860's, during our country's Civil War. How would allowing development around that area affect their perception of Frederick County? I think they would perceive that Frederick County didn't value the 'hallowed ground'.

Please, protect my neighbors and the entire Sugarloaf area from increased flooding by not allowing any more development west of I-270. There is one thing we know for certain: once land is developed, (ie: chain-sawed, bull-dosed, dug-out, paved-over and lighted-up) the earth and the atmosphere can't be put back the way it was. You, as Planning Commissioners, are no longer just planning for one county in one state. What you do here has serious ramifications locally and far beyond Frederick County.

Do no harm. Do the right thing and adopt the well-written Sugarloaf Plan with boundaries at I-270 to the Monocacy River.

Thank you for your consideration.

Nancy Izant
2770 Lynn St
Frederick, MD 21704

James, Karen

From: Planning Commission
Sent: Monday, November 8, 2021 1:29 PM
To: James Coulombe
Cc: Brandt, Kimberly G.; Goodfellow, Tim
Subject: RE: Sugarloaf planning area boundary consideration

Good afternoon:

Thank you for taking the time to express your thoughts on the Sugarloaf Treasured Landscape Management Plan.

Your comments will be shared with the Planning Commission for their consideration.

Karen L. James
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From: James Coulombe <duetto14@gmail.com>
Sent: Monday, November 8, 2021 10:11 AM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Sugarloaf planning area boundary consideration

[EXTERNAL EMAIL]

Members, Frederick County Planning Commission,

I would like to urge you to vote to have the boundaries of the Sugarloaf planning area extend along the West side of I270 and North to the Monocacy River. This simply makes sense geographically and would be hoped to provide an additional layer of consideration for any future development in this area so that any new building is in keeping with the surrounding geographic and historic area.

This is an area which has not been planned for further growth while to the east of I270 considerable land is still within the boundaries of a planned growth area. Despite not being planned for growth and entirely reliant on well water and septic systems the current Frederick County zoning and planning processes have not proven adequate, and a further layer of consideration is warranted for any development within this region.

A recent example of the failure of Frederick County planning processes can be found in the large swath of new construction for 57 large homes on the former Ramsburg farm. This development in an area not previously planned for development, entirely dependent on well water and septic sewage systems, and with emergency access via a single road contravened all prior plans for the area. If a portion of undeveloped land is cut out from the Sugarloaf plan that will certainly be the fate of those areas as well.

The County zoning and planning processes are not sufficiently robust and fail to adequately consider potential impacts of development for the surrounding areas. There is no consideration for runoff from paved areas, light

pollution from unattended night lighting, traffic on state or federal roads, or additional nitrate and other pollution burdens for surrounding streams. Nowhere in the approvals process is consideration of electrical power consumption and the additional transmission infrastructure that might be required. Consideration of water usage and potential impacts on neighboring wells by the state of Maryland is nominal at best. For example, the application for water usage on the minimum one-acre residential lots the County allowed built in the Ramsburg development would only provide adequate irrigation for a tenth of an acre of lawn. Undoubtedly these water allocations are frequently exceeded and there is no monitoring by any entity.

The boundaries of the Sugarloaf area should be part of a logical geographic area. Carving out parcels of land for some still to be imagined "study" area is nonsensical. If future needs of the community warrant these areas can always be considered in light of future needs. Clearly planning efforts are not permanent and if the need to allow further growth this could certainly be accommodated in future planning efforts, when adequately justified. However, any future development should be considered along with the impacts to the surrounding Sugarloaf region. Small portions certainly should not be set aside to favor or avert a litigious threat from a small group of land speculators while considerable new development can still be accommodated to the East of logical I270 boundary in an area long planned for municipal water and sewer services or in already developed areas that now are unused. Development is a one-way ratcheting process and should be done in logical geographic portions and not fragment by fragment without regard to all impacts on the surrounding region.

Thank you,

James N. Coulombe, Ph.D.

2770 Lynn Street

Duetto14@gmail.com

James, Karen

From: Planning Commission
Sent: Monday, November 8, 2021 7:55 AM
To: Carol Waldmann
Cc: Brandt, Kimberly G.; Goodfellow, Tim
Subject: RE: Sugarloaf Treasured Landscape

Good morning:

Thank you for taking the time to express your thoughts on the Sugarloaf Treasured Landscape Management Plan.

Your comments will be shared with the Planning Commission for their consideration.

Karen L. James
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From: Carol Waldmann <c.waldmann@comcast.net>
Sent: Monday, November 8, 2021 6:36 AM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Sugarloaf Treasured Landscape

[EXTERNAL EMAIL]

I am a Frederick resident and feel strongly that all the area to the west of 270 should be included in the protected area. I feel it would be best if it included areas up to the Monocacy battlefield, but the portion further south that was temporarily cut out is particularly important. Both these areas also compliment the Mont CO agricultural preserve. They are the gateway to Frederick and are in fact treasures that should not be destroyed.

thank you for your consideration,

Carol Waldmann M.D.
cw@alum.mit.edu

October 8, 2021

Dear Frederick County Planning Commission members:

I live at 8101 Fingerboard Rd. My property is at the intersection with Fingerboard (Rt. 80) and Parks Mill Rd. I would like to highlight some concerns I have about The Sugarloaf Treasured Landscape Management Plan. Although, I think the Plan is a good start for preserving the Sugarloaf area, I don't believe it goes far enough to protect this beautiful and unique area of Frederick County. Going into the future, the development pressures on Frederick County will be great, particularly in the southern part of the County. If we are intent on preserving the Sugarloaf area, then please consider the following issues:

Greater and More Effective Public Engagement

So far, the County Government has sent only one postcard months ago to the approximately 800 households within the planning area as a notification of the Plan. Many of my neighbors have never heard of the Plan; let alone, know anything about its contents. They are not aware that the Plan contains a preservation overlay which will constitute a rezoning of their property. If the County was proposing to rezone an individual property, it would certainly notify the property owner with more than a post card.

In addition, I believe, the virtual format is impeding public input. At the last Planning Commission workshop, there were technical difficulties and by the time callers were able to comment, only five people were on the line. I know of citizens who tried to offer comments and were unable to get through. I am sure there were others who simply gave up. I did stay on the line and was able to comment. However, I had difficulty understanding the proceedings. I could not see what was happening and who was speaking. The experience was intimidating and confusing. Since most oral communication is nonverbal, this format severely limits public engagement. This Sugarloaf Plan is too important for such limited public engagement. The stakes are very high and will affect land use in this area for many years to come. There must be improved public notification and access to engage in the process.

Extend the Northern Boundary and Study I-270 Corridor

As the Plan's northern boundary is currently drawn, my property is on the Rt. 80 boundary. I am located about a half a mile from I-270. I am extremely concerned that this Plan proposes a preservation overlay which will limit my and other property owners' ability to rezone; but yet, will allow property owners between Rt. 80 and I-270 (not included in this plan) to more easily seek rezoning from agriculture to industrial or other types of development. County staff has stated that they will undertake a study of the I-270 corridor at a future date. I would like to see a more coordinated approach to planning in this area. I am in full support of

extending the boundary for the Sugarloaf Plan to I-270. And, I am against allowing development right next to an area with a preservation overlay. I fully support the already existing commercial zoning of the properties around the I-270/Rt. 80 interchange. I-270 creates a natural boundary that will clearly separate the growth area from the preservation area. It concerns me that the County is considering approving this Plan with its preservation overlay without a clear plan on the I-270 corridor. Wouldn't it make more sense to coordinate the planning for these two areas?

At the last Planning Commission workshop, one of the members asked me if I was aware that the Livable Frederick Plan includes an interchange for I-270 at Parks Mill Rd. While I am aware that this interchange has been discussed for a long time, I am not aware of any concrete plans or funding to build it in the near future. My understanding is that Livable Frederick is a guide for future planning but is not written in stone. I also understand that an interchange will only be built if there are multiple modes of transportation in that area. And, this is far from a done deal. Such infrastructure is costly and perhaps will be unnecessary as environmental and economic conditions continue to change. Climate change and the pandemic have and will continue to change the way we live, work and do business in this country. Let's reassess old assumptions about land use planning and economic development. And, please, let's not allow where a developer owns property to be the driver of our land use decisions.

While I respect all of the hard work that went into creating Livable Frederick, I cannot support a plan that allows development right next to property that is bound by a preservation overlay. I was not aware when Livable Frederick was under creation that all of the adjacent property would be eventually be under a preservation overlay. As a result, those of us who live on the boundary are facing great uncertainty. We don't have any idea if or how the I-270 corridor will be developed. We don't know how any future development will affect the environment, natural resources, infrastructure, our ability to farm or live on our properties, or our property values. An I-270 corridor study should look at the economic and environmental issues that will affect the Sugarloaf Planning area. Without this information, it is premature to finalize this Plan. Having said that, let me reiterate my support for drawing the boundary of the Sugarloaf Plan at I-270. Such a boundary will better protect the Sugarloaf area and will still allow for development on the east side of I-270.

Work with Stakeholders (Large and Small)

At the last Planning Commission workshop, John Webster of the Stronghold Corporation that owns Sugarloaf Mountain, stated that they do not want a preservation overlay on their land as it will restrict their operations to such an extent that they may need to close to the public. Of course, such an outcome would be a huge loss for Frederick and Montgomery Counties and the entire region. And, it left me wondering. How is it possible that the County Government issued a draft land use plan that does not factor in the concerns of the largest landowner within the plan? Just that fact alone seems to throw into question the entire process for creating this Sugarloaf Plan. Not only is Stronghold the largest landowner, but their property—Sugarloaf Mountain—is the focal point and namesake of this Plan's preservation effort. And, if the

County has not listened to the largest stakeholder, what does that say about how well it is listening to the smaller stakeholders. The County needs to do a much better job of working with all of the stakeholders (large and small) to create this Plan.

You have already heard from numerous stakeholders regarding the Thurston Rd. "cutout". That is another action on the County's part that throws suspicion into this whole process. The County has never provided an acceptable explanation of why this area of land was in the Sugarloaf Plan and then taken out without public input. As a result, and understandably so, the community is now suspicious and the rumors are flying. One of the bedrocks of healthy relationships (and good governance) is transparency, which is lacking in the creation of this Plan.

Summary

For all of these reasons, I would like the Planning Commission to take a step back from the Sugarloaf Plan. They must do a much better job of providing avenues for effective public engagement and demonstrate they are actually listening to the many stakeholders who feel the plan boundary should be I-270. If we cannot hold in-person public meetings at this time, then wait until we can. Coordinate the planning of Sugarloaf with the I-270 corridor so that citizens (particularly those living on the boundary) have more information about if and how that area will be developed. And, work out the issues with Stronghold and other stakeholders so that we have a clear and shared vision for the Sugarloaf area.

Thank you for your consideration.

Johanna Springston
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Frederick, MD 21704

Cc: Frederick County Council members
Frederick County Executive Jan Gardner