



Maryland DEPARTMENT OF PLANNING

May 5, 2022

Ms. Kimberly Golden Brandt
Livable Frederick Director
Frederick County Planning Department
30 North Market Street
Frederick, MD 21701

Re: 60-day review of the Draft of The Sugarloaf Treasured Landscape Management Plan

Dear Ms. Brandt:

Thank you for reaching out to the Maryland Department of Planning (Planning) to provide comments on the Draft Sugarloaf Treasured Landscape Management Plan (Plan) and your participation in the Maryland State agency plan review process. Planning previously reviewed a preliminary draft of the plan in August of 2021.

The Maryland Department of Planning (Planning) believes that good planning is important for efficient and responsible development that successfully addresses resource protection, adequate public facilities, community character, and economic development. Planning's attached review comments reflect the agency's thoughts on the strengths of the county's Plan, as well as potential ways to improve it and best satisfy the requirements of the Land Use Article.

The Department forwarded a copy of the Plan to state agencies for review including, the Maryland Historic Trust and the Departments of Transportation, Environment, Natural Resources, Commerce, Housing & Community Development, and Agriculture. To date, we have only received comments from the Maryland Historic Trust, and these comments are included with this letter. Any plan review comments received after the date of this letter will be forwarded to you upon receipt.

Planning respectfully requests that this letter and accompanying review comments be made part of the county's public hearing record. Furthermore, Planning also asks that the county consider our comments as revisions are made to the draft Plan, and to any future plans, ordinances, and policy documents that are developed in support of the Plan.

Planning is eager to provide support or clarification in the continued development of the Draft of The Sugarloaf Treasured Landscape Management Plan. Please feel free to contact Susan Llareus at susan.llareus@maryland.gov with any questions you may have.

Sincerely,

Charles W. Boyd, AICP
Director, Planning Coordination

cc: Joseph Griffiths, Local Assistance and Training Manager Susan Llareus, Planning Supervisor for the Maryland Capital, Central, and Southern Regions
Kimberly Golden Brandt, Director, Livable Frederick Planning and Design Office
Tim Goodfellow, Livable Frederick Planning and Design Office



**Maryland Department of Planning Review Comments
May 5, 2022
Draft of The Sugarloaf Treasured Landscape Management Plan**

The Maryland Department of Planning (MDP) has reviewed The Sugarloaf Treasured Landscape Management Plan Draft (Plan) and offers the following comments for your consideration. These comments are offered to guide the county in ways to improve the Plan and better address the statutory requirements of the Land Use Article.

The *Livable Frederick Master Plan* (LFMP) was adopted September 3, 2019. As noted in the Introduction of the LFMP, “As Community and Corridor plans, large area plans, and functional plans are adopted, they will constitute amendments to the Livable Frederick Comprehensive Plan.” (page 14). The LFMP also set forth the vision of creating large area plans to “provide focus on contiguous regions of the county, such as the Middletown Valley or the landscape and historic resources surrounding Sugarloaf Mountain” (page 17).

The LFMP notes that the area demarcated as the “Sugarloaf Mountain Historic Survey District” (Survey District) covers approximately 10,500 acres and indicates there are several long-term protective easements established in the area of Sugarloaf Mountain. But even with the protections that exist today, the LFMP indicates that the area remains “vulnerable”, and that additional land protection is needed for environmental areas to avoid degradation and to protect the viewshed. The Frederick County Planning Commission and staff from the Livable Frederick Planning and Design Office, in response to these identified concerns, prepared the Sugarloaf Treasured Landscape Management Plan as a large area plan that proposes to refine the vision for this area of the county and identify tools to achieve the policies and goals of the LFMP.

The Planning Area, which includes the Survey District, is approximately 19,719 acres, located in the southern region of the county, west of I-270, north of the Montgomery County line and east of the Monocacy River, Greenfield Road, and a portion of MD 28 (page 8). The Planning Area Boundary as shown on Map 1-1 is larger than the Survey District, as it represents a nearly two-fold increase in size and extends beyond the areas, such as the Sugarloaf Mountain Rural Heritage Landscape and the Natural Resource Lands, specially delineated in the LFMP Thematic Plan Diagram (p. 40) and any of the comprehensive and regional plans from 1972, 1978, 1984, 1993, 2004 and 2012 (depicted in the Appendix at A-15 – A-20). The vision of the Plan describes the unique geologic landform, the scenic and rural landscape, and promotes stewardship and sustainability (page 5). The Plan includes the following vision statement for the area:

“A unique geologic landform in Maryland, Sugarloaf Mountain is a defining element of Frederick County’s treasured scenic and rural landscape. The mountain and the area surrounding it possess a sublime beauty and significant biodiversity, where a high-quality environment is maintained. Forestlands, aquatic resources, wildlife habitat, inspiring vistas, and historic resources are valued and protected. Land uses are sensitive to both the natural environment and rural character of the area. Stewardship of the area’s natural

assets and cultural resources ensures healthy, resilient, and economically productive lands for current and future generations. As we face climate change challenges, Sugarloaf Mountain and the surrounding landscape provide ecosystem benefits to the residents of both Frederick County and the wider region, enhancing the sustainability of our shared environment.” (page 7).

The Plan also includes three major goals:

- Protect and enhance the Sugarloaf Area’s natural resources and environmental assets, including its forests, waters, biodiversity, and wildlife habitats.
- Strengthen the distinct place-based identity of the Sugarloaf Area through the stewardship of its scenic and rural character, and its agricultural and cultural resources.
- Foster resilient relationships between the natural and built environment through the mitigation of, and adaptation to, climate change.

General Comments

- The Plan is missing a demographic analysis of the Planning Area. It would be helpful for context to include demographic information in the Plan to address equity issues that might arise from the policies or initiatives.
- The expansion of the historical and cultural resource protections associated with the Survey District to include all portions of the plan area has implications that may diminish the state’s investment in I-270 highway infrastructure, including existing and planned corridor and interchange improvements. This appears to be an expansion of the natural resource and cultural protections included in the LFMP, but may conflict with the identification of the I-270 corridor as a Primary Growth Sector, as stated in the LFMP Thematic Plan Diagram. Page 45 of the LFMP goes on to state that “[a]dditionally, the Interstate Corridor will continue to capitalize on significant access to regional employment centers by supporting policies that facilitate the development of the area as a prime employment corridor enhanced by livable, mixed-use neighborhoods between the City of Frederick and northern Montgomery County.”
- The use of the satellite imaging of the base map makes the mapping information shown on most of the maps difficult to read. For example, the Stronghold Incorporated holdings and Monocacy Natural Resource Management area/Urbana Lake area on Map 1-2 (page 13) looks different from the color used in the legend. It might be beneficial to turn the imagery off in some cases to better distinguish the map elements.
- For informational and educational purposes, it might be helpful to indicate that the public can reference the current land use maps electronically at: <https://gis-fcgmd.opendata.arcgis.com/pages/map-atlases> and that the same land use information is contained on the [Frederick County Maryland Property Explorer GIS](#) mapping tool, under the land use layer.

Section Specific Comments:

Chapter I-Introduction and Background -This chapter explains the purpose of the Plan and how it complements Frederick County’s other planning efforts. It shows that the Plan is up to date in its consideration of climate change and mention of the Covid-19 pandemic. The vision statement, goals, and geographical context are presented well. Planning suggests that a statement be added to the Introduction and Background Section of the Plan indicating that this plan constitutes an amendment and/or refinement to the LFMP.

As described above, the Planning Area Boundary appears to be an enlargement of the area identified in the LFMP's Thematic Plan Diagram. An area to the northwest of Hopeland is included in the Planning Area, but excluded from the Sugarloaf Mountain Rural Heritage Landscape as shown on the LFMP Thematic Plan Diagram. Planning suggests some language be added to the Plan to explain the various expansions of the Planning Area from the area outlined in the LFMP.

Chapter II-History and Culture -This chapter is interesting and provides a description of the European Settlement, African Americans in Frederick County, Early Industry, Transportation, the Monocacy National Battlefield Park, and Historic Designations. The additional information about pre-historic activities and the African American experience add depth to one's appreciation of the Sugarloaf area. The same can be said of the new information devoted to the Monocacy National Battlefield Park. Please see the attached letter from the Maryland Historic Trust for more information.

Chapter III-Stronghold Incorporated and Sugarloaf Mountain-This chapter explains the many important natural resources found in the area of Sugarloaf Mountain: Wetlands of Special State Concern, National Natural Landmark, State Forests of Recognized Importance, Green Infrastructure, Ecologically Significant Areas, Forest Legacy Area, rare species, etc.

The role of Sugarloaf Mountain in Frank Lloyd Wright's career is fascinating and will come as a surprise to many readers. The story of the post office mural of Sugarloaf Mountain is also interesting and well-illustrated (pp. 40-41).

Planning supports the initiatives on pages 38 and 42. Initiative 3E on page 42 states:
"Support the preservation of Stronghold, Incorporated's 3,000 acres through a conservation easement device to ensure permanence and protection of all of its resources — cultural, environmental, historic — with no reduction in size, integrity, or ecological function."

This statement needs elaboration to address the end of the Stronghold Trust in 2046 and who will hold the easement after it expires. The question raised in the reader's mind is, who will hold the easement? Is the Stronghold Trust able to engage in an easement at this time or must the Trust reach the expiration before another easement could be placed on the property? This is a legal matter that should be addressed prior to plan adoption, as the Plan should recognize that the cooperation of the landowner (Stronghold Trust) is needed to ensure a perpetual easement. The government cannot just place an easement over the property, yet citizens reading the document might not understand this legal aspect. However, to address the statement above, it might be useful to reference the various options and strategies in Chapter IV included in the "Land Conservation" section to incentivize the conversion of the land area held in the easement and to promote the development of a perpetual easement(s).

Planning understands the dilemma of future operational status and management beyond 2046 and recognizes there may be a desire to continue to realize Gordon Strong's vision in perpetuity for all people in future generations. Ideally, the mission of Stronghold, Incorporated, of environmental protection, education, and appreciation of natural beauty, will live beyond 2046.

Chapter IV-Land Use -It would be helpful for the community to understand how the Plan will integrate into the existing plans such as the LFMP and the Comprehensive Plan Map. If it is the intent that the Plan's Comprehensive Plan Land Use Designations Maps (4-2a and 4-3) are to replace a portion of the 2010 (amended 2012) Land Use Plan Map adopted by reference in the LFMP, Planning recommends that the county-wide Comprehensive Land Use Plan Map be

appropriately amended to reference the newly refined area depicted on Maps 4-2a and 4-3 (pages 61-62). Further, Maps 4-2 through 4-3 provide a comparison of the current land uses to the proposed land uses of the Plan. If adopted, it is appropriate that the resolution include language specifically stating that the Plan amends the LFMP and the Comprehensive Plan Map land use designations. Planning cautions that without an updated county-wide land use plan as suggested in the LFMP, the incremental replacement by land use designations established in this and other future area plans, corridor plans, functional plans, etc.... will lead to an increasingly disconnected 2010 Comprehensive Land Use Plan Map.

Land Use in the Sugarloaf Planning Area – Page 46 says that a “very low-density development pattern in the Sugarloaf Planning Area, consisting primarily of large-lot, single-family residential dwellings, is suitable for a rural area with significant and sensitive environmental resources.” Its suitability depends on how low the density is and how many houses have been built. Details are provided later, but Planning suggests that the county consider whether it might be better to insert here how many acres are involved and to show it on a map. Planning supports policies 4-1 through 4-4 (pages 46, 48, and 58), though perhaps the Plan should mention that further details about “land use designations, zoning classifications, and development densities” will appear later in the Plan.

Planning agrees with Initiative 4B (p. 50) which mentions Best Available Technology (BAT) upgrades for new or replaced non-residential on-site sewage disposal systems, but also suggests that the Plan include how best to address failing residential septic systems. Initiative 4C mentions coordination with local fire departments about spills of hazardous materials, also supported by Planning. This initiative deals with cleaning up hazardous materials; the Plan might also benefit from a discussion of whether the “forever chemical” family of PFAS, contained in fire-fighting foam, pose a threat to the planning area.

Livable Frederick Master Plan and Comprehensive Plan Map - The heading for Table 1A and 1B should add “Land Use” after “Comprehensive Plan.”

Planning also notes that the acreages shown in the same tables do not sum to reflect the entirety of the Planning area. It seems that the differential between the existing and proposed changes should be equivalent when comparing the additions and subtractions of the proposed land uses. Planning recommends additional analysis to determine if corrections are needed.

The use of the term “Treasured Landscape-Sugarloaf” (page 51) may include land areas beyond the current land holding of the Stronghold, Inc., which also adds to confusion about changes in land use. The term appears to be defined in such a way to indicate significant features within the area, but is it intended to represent a land use designation? If this is intended to be a land use designation, is it meant to be prohibitive beyond the provisions of the underlying Natural Resource land use shown on Map 4-2a?

Planning notes the lack of the General Commercial zone in Tables 1C and 1D, but which are within the Planning Area as shown on the mapping of the Planning Area. It appears to be expanding near the 1-270 and MD-80 intersection. An explanation is warranted.

Table 1B page 51 and Table 1D page 52 – Label the fields or somehow indicate the data is in acres.

Page 52, Table 1D: It is not clear why 1,257 acres of the Planning Area are proposed to be added to the Resource Conservation (RC) Zone, which would allow 10-acres lots, and 1,053 acres removed from Agricultural Zoning. It appears that Agricultural Zoning category allows 3 lots plus the remainder from original tracts of as of August 18, 1976; additional cluster subdivision rights of one additional lot per 50 acres on tracts 25 acres or more are permitted. If the RC Zone is denser than the Agricultural Zone, an explanation of how the change from Agricultural zoning to Resource Conservation zoning is more protective of farmland and/or environmentally sensitive features would be helpful.

Growth Tier IV Exemption - In addition to the above concern, the proposed rezoning of 1,257 acres may contribute a substantial number of units to the Growth Tier IV area, that may warrant an update to the growth tier map to reflect those modifications, in accordance with the statutory mapping criteria of the Septic's Law. Planning recognizes that the area of the Plan is only a portion of the overall Growth Tier IV area, and that the one dwelling unit per 20-acre threshold of the exemption that allows subdivision is not based on a region of the county or the limits of this Plan, but nonetheless, rezoning of land from Agricultural zoning to Resource Conservation zoning could impact the Growth Tier IV exemption. As stated in the October 10, 2019, letter from Valdis Lazdins, Assistant Secretary, Planning to Steven C Horn, Director, Frederick County Planning and Permitting Division states: "...the County retains its Tier IV exemption based on Planning's May 13, 2013, initial review that the actual overall yield of Frederick County's cumulative Tier IV area is less than one dwelling unit per twenty acres. In the event that the County modifies its established zoning or subdivision requirements or its Tier IV boundaries in the future, Planning will review these modifications, first for consistency with statutory rules for growth tier delineation, and second to re-evaluate the County's Tier IV exemption." (emphasis added). Planning staff is available to answer any questions regarding updating of the Growth Tiers.

Page 52, Table 1C and Table 1D may have some calculation errors. Table 1D compares existing and proposed zoning districts. The existing total acreage is 19,370.29 and the proposed total acreage is 19,578.29. Should the areas be the same? Also, shouldn't the differential between the existing and proposed changes be equivalent when comparing the additions and subtractions of the zoning classifications? Also, the above figures do not match the total Planning Area acreage noted on pages 8, 45, and 105.

Subdivision – Page 52 includes information relating to the existing development of the Planning Area, including the estimate that 93% of the parcels and lots within the planning area have been developed. Of the 7% of the remaining parcels and lots undeveloped, is there an estimate of the ultimate development potential of the area? Has the county compared the RC and Agricultural Zones to estimate overall potential density of the Planning Area?

Sugarloaf Rural Heritage Overlay Zoning District-The Sugarloaf Rural Heritage Overlay Zoning District (Overlay) and its regulations are proposed to cover the entirety of the Planning Area and provide a way to use the Planning Area's resources in a limited, sustainable way. The objectives and goals of the overlay include the following:

- To address the scale and visual impact of land uses and development that can degrade rural qualities, excessively burden the transportation network, and overwhelm the scenic and rural nature of the Sugarloaf Planning Area.
- To minimize adverse impacts of land development activities on forestlands and natural habitats.

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- To regulate the amount of impervious surfaces to control the volume of stormwater runoff and stream bank erosion, maintain levels of groundwater infiltration, and retain as many of the functions provided by natural land as possible.

A review of the information contained in the Appendix shows that the development of the proposed regulatory framework (page A-21) needs some clarity. Planning has the following comments relating to the framework:

- Page A-21 states that the maximum building footprint of a new or existing structure for non-residential and non-agricultural buildings use will be 15,000 square feet. Is there justification for this maximum size? Has a maximum of lot coverage been considered as another regulatory tool to address impervious surfaces for heat island reduction? Perhaps the reference to existing structures should be removed because they should be grandfathered if they were legally constructed.
- An exception is allowed to the maximum 15,000 square foot non-residential building size on page A-21, stating:

“A request to exceed the 15,000 square foot building footprint for new non-residential buildings or expansions/enlargements may be granted by the body or entity with specific approval authority upon review of a justification statement from the applicant/owner that addresses and describes, in detail, the following:

- “. The unique needs of the proposed activity or use that warrant a non-residential building larger than 15,000 square feet; and
- “. The site design elements and building design features, such as enhanced energy efficiency, water conservation (e.g., re-use, consumption reductions), and stormwater runoff controls, or other measures that will be utilized to minimize negative impacts to natural resources and surrounding properties that may result from the overall development proposal and increased building square footage.”

Planning suggests that the county consider some questions in preparation for implementing these exceptions. What finding must be made by the approving authority regarding the exception above to allow for a decision that is not arbitrary? What process will be used if other design standards are not being met? Planning suggests that a process other than a variance should be established to allow for alternative design standards for development to move forward if the proposed alternative is found to be equally effective to address the intent of the design standard.

Existing buildings, improvement or uses that do not conform to the site design standards of the overly zone will become non-conforming, unless a clause is included in a grandfathering section of the master plan relating to its applicability. This is an important aspect of overlay zones that can wreak havoc after the adoption if ignored or not included in the document. The following are a few examples of language that the county could consider adding to the plan to clarify the applicability and exemptions from the overlay zoning site design standards summarized from Prince George's County *“Approved Largo Town Center Sector Plan and SMA, Chapter Eight: Development District Standards (2013)”*:

- Note that all legally existing development, including all buildings, structures, and uses that were lawful or could be certified as a legal nonconforming use on the date of adoption of the rezoning, are exempt from the development district standards and from site plan review and are not nonconforming. This avoids any legally existing development from becoming non-conforming.
- Provide a list of minor improvements that would be exempt from the design standards and site plan review if the existing or proposed use is permitted, such as
 - a. Permits for alteration or rehabilitation with no increase in the existing gross floor area.
 - b. Canopies.

- c. Fences of six feet in height or less for rear and side yards.
- d. Decks.
- e. Ordinary maintenance.
- f. Changes in use or occupancy.
- g. Changes in ownership.

Planning suggests that the consideration of site design standards could be expanded to include limiting impervious areas on a site though a maximum lot coverage that would include the building as well as the parking and vehicle storage areas, incentivizing green roof and green screen systems, maximizing tree canopy and the use of native planting, restricting invasive species, and requiring a system to quantify how the project features energy usage will be more efficient than the existing code requires, if the new structure is over 15,000 square feet in size.

- The Design Standards on page A-22 could benefit from illustrations.
- The overlay appears to require a natural resources inventory for zoning cases, but it does not seem to require the same for a subdivision plan (page A-23). Since the layout of lots are established in the entitlement process through the approval of a subdivision, Planning suggests that a natural resources inventory also be required at the time of the subdivision process. The following website may be useful in addressing all aspect of a natural resources inventory:
- Will private schools, philanthropic, religious, or other institutional uses be permitted in the overlay zone? Consider “[The Religious Land Use and Institutionalized Persons Act](#)”, which is a federal law that, among other things, protects religious institutions from unduly burdensome or discriminatory land use regulations
- The Plan should clearly state that only those requirements of the underlying zones specifically noted in the overlay zone are modified and all other requirements of the underlying zones are unaffected by the overlay zone.

Land Conservation -The list of easement and land purchase programs on pages 54-58 is mostly up to date, including MARBIDCO’s two new programs and MALPF/local easement acreage through October 2021. Planning recommends that the acreage total for all the programs within the Planning Area be included and listed in a table such as that on page 66 of the Frederick County’s draft Land Preservation, Parks, and Recreation Plan. Perhaps a simple preserved lands map would be useful here, showing land under easement in one color, publicly owned lands in another, and the Stronghold, Inc. lands in a third.

Since Montgomery County’s Agricultural Reserve abuts the southern end of the Sugarloaf Planning Area, perhaps the map could include a neighboring slice of the Agricultural Reserve to show how land preservation at Sugarloaf is complemented by preservation efforts in Montgomery County. It would also be illuminating to show parcels on both sides of the county boundary line that are eligible for preservation, which would further support preservation efforts in the Planning Area.

Policies 4.4-4.7 on page 58 will be impactful, especially the excellent initiative of expanding the Carrollton Manor Rural Legacy Area within the Sugarloaf Planning Area.

The last page of the Land Use section in the preliminary draft of the Plan contained a map of the proposed expansion of the Carrollton Manor Rural Legacy Area, but the map does not appear in

the current draft of the plan. Planning recommends that it be included unless the proposed boundaries have not yet been decided.

Chapter 5-Transportation Network –Planning recommends that the county evaluate the need to improve bicycling friendliness and safety in the Planning Area. The Plan states:

“...many of the roadways (in the planning area) are frequently used by bicyclists and walkers.for recreational activities – walking, bicycling, running, and horse-crossing” (page 70).

Improving the biking and walking environment in the Planning Area will promote multimodal access to various scenic areas and historical and cultural sites, which helps achieve the Plan’s vision and goals (page 7). Therefore, Planning suggests the Plan include bicycle and pedestrian policies/strategies or initiatives, including creating trails/biking maps, to address bicycle and pedestrian routes, public access, trailheads and parking areas, etc....The Federal Highway Administration (FHWA)’s report on “[Small Town and Rural Multimodal Networks](#),” provides best practice examples to enhance pedestrian and bicycle networks in rural communities.

Initiative 5A addresses Thurston Road and Park Mills Road safety issues (page 71). Planning suggests the following resource; “[Proven Safety Countermeasures](#),” an initiative by the FHWA to provide a collection of roadway safety improvement tools to assist local, state, and federal agencies to address roadway safety issues. The information may provide the county with some useful ideas on how to improve roadway safety in the Planning Area.

The Op Lanes Maryland Project (page 71) could bring significant highway capacity and congestion improvements on I-270 as a Primary Growth Sector, as detailed in the LFMP, which could have land use and growth impacts that may conflict with revised local land use goals and policies. The Sugarloaf Treasured Landscape Management Plan plays an important role in helping to address any potential negative impacts from growth along the I-270 corridor. The land use initiatives and policies defined in Chapter 5 augment the rural, agricultural, and natural resource land protection. In addition, Planning staff suggests the Plan add language in Initiative 5C (page 73) to address the potential for any adverse land use and growth impacts that may result from the Op Lanes Maryland Project. Planning suggests Initiative 5C could be modified as, “.....to support localized mitigation of forest and wetland impacts **and address indirect land use effects** from the Op Lanes Maryland Project as it moves through the sugarloaf Planning Area.” Please note that the words in **Bold** here are the addition.

Please clarify that Op Lanes Maryland (page 71) stands for [Op \(options and Opportunities\) Lanes Maryland](#).

The addition of the recommendation on page 76 to reduce the use of road salt in the Sugarloaf Planning Area is environmentally sound.

Planning applauds policy 5.3 and Initiative 5E (p.78) to establish scenic road designations and encourages developing design standards for the protection of these scenic roadways and the viewsheds beyond the corridors. Montgomery County is currently working on a scenic road functional master plan for the entire county and there are plenty of resources on their website that may be helpful: <https://montgomeryplanning.org/planning/transportation/highway-planning/rustic-roads/>

Watershed Water Quality-To avoid confusion, the second paragraph under “Maryland’s Designated Use Classes on page 82 should indicate that the “numeric criteria for water quality”

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are the use Classes I to IV described afterwards and that the “P” can sometimes follow those numerals.

Figure 3 on page 89, is somewhat confusing and should be enlarged and explained in layman’s terms. It is difficult to understand.

Policy 6.9 on page 96 states:

“Examine quantities of groundwater requested by large-scale commercial and institutional uses through the MDE groundwater appropriation and use permitting process in order to maintain springs and seeps, and to ensure stream base flows needed for sensitive cold-water aquatic biota and protection of nearby private residential wells.”

The Plan could explain what the county will do if future requested withdrawals are too large. Since the county does not have control over groundwater appropriations, it is anticipated that the county will work with the Maryland Department of Environment to determine possible methods to protect these sensitive water resources.

Forestlands, Green Infrastructure, and Biodiversity -The text in this chapter does a good job of identifying the resources, explaining why they are important, and proposing strong policies and initiatives to protect and enhance them. The section on Programmatic Opportunities for Reforestation (page 110) were important to include.

Climate Change -The policies and initiatives in this chapter are sound; those under the Agriculture and Carbon Sequestration Section in particular are innovative, and Planning is interested in learning of their progress. Policy 8.3, which states “[s]upport landowners who employ and adopt sustainable, regenerative agricultural practices that enhance soil productivity and carbon sequestration, and protect water quality, thus providing overall greater resilience to climate change” is consistent with “A Better Maryland State Development Plan” that includes a strategy to adapting and become resilient to climate change by promoting “healthy soils, which are vital to ecological and agricultural resilience.” (CC#4, page 13).

Planning notes that the Fourth National Climate Assessment from 2018, referenced on page 125, is still the most recent. The next Assessment is scheduled for release in 2023. Also, the Plan refers to some horrendous events exacerbated by climate change in 2020; perhaps some reference to droughts, forest fires, etc. from 2021 and 2022 could be included.

Climate Response and Resilience Executive Summary (A-31)

This summary provides important information and demonstrates that planning for the Sugarloaf area will address current issues.

Conclusion

Planning commends the county on a thoughtfully constructed master plan and the conservation of the lands surrounding the Sugarloaf Mountain Historic Survey District. If Planning can be of any further assistance or facilitate assistance or information from other State agencies as Frederick County continues the processing of this master plan, please contact Susan Llareus, Planning Supervisor for the Maryland Capital, Central, and Southern Regions, at susan.llareus@maryland.gov

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Secretary
Sandy Schrader, Deputy Secretary



April 7, 2022

Ms. Susan Llareus, PLA, ASLA
Regional Planner for Maryland Capital Region
Maryland Department of Planning
301 West Preston Street, Room 1101
Baltimore, MD 21201

Dear Ms. Llareus:

Thank you for the opportunity to review Frederick County's draft *Sugarloaf Treasured Landscape Management Plan* and submit comments on behalf of the Maryland Historical Trust (MHT).

We commend Frederick County and the Livable Frederick initiative for this effort to synthesize the vision, context, and planning recommendations for Sugarloaf Mountain – an irreplaceable scenic, natural, and cultural resource -- via a “Treasured Landscape” framework and management plan. In particular, we support the careful and detailed inclusion of archaeological and cultural resources (Chapter 2) as an integral part of the management plan, when Sugarloaf is primarily recognized by the general public as a recreational resource. We also appreciate the acknowledgement (p. 15-16) that the existing data does not adequately represent all histories, particularly related to the African American experience in Frederick County.

MHT may be able to assist in supporting the plan's recommended strategies through the Historic Preservation Non-Capital Grant Program, the Certified Local Government Program, the Maryland Heritage Areas Program, and technical assistance via the Office of Research, Survey, and Registration. We also look forward to seeing the how the Treasured Landscape approach evolves; if successful, it may serve as a model for other communities.

Thank you again for the opportunity to comment on the plan. Please let me know if you have any questions or would like more information about our programs. I can be reached at nell.ziehl@maryland.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Nell Ziehl".

Nell Ziehl
Chief, Office of Planning, Education and Outreach

Cc Joseph Griffiths, MDP
 Rita Pritchett, MDP