

From: [Elizabeth Hill](#)
To: [Planning Commission](#); [Horn, Steve](#); [Hessong, Gary](#); [Specht, Jennifer](#)
Cc: [Donald, Jerry](#); [McKay, Steve](#); [Carter, Mason](#); [Knapp, Renee](#); [Keegan-Ayer, MC](#); [Young, Brad](#); [Duckett, Kavonte](#); [Cherney, Ragen](#); [County Executive](#); [Kadish, Chelsea](#)
Subject: MFA Comments on Proposed Forest Management Provisions in the Sugarloaf Overlay
Date: Wednesday, February 22, 2023 8:27:59 AM
Attachments: [MFA Comments on Proposed Forest Management Provisions in the Sugarloaf Overlay.pdf](#)

[EXTERNAL EMAIL]

Hello all,

Last week MFA with the assistance of the Maryland Forest Service, hosted The Frederick County Forestry Forum. Based on presentations, discussions, and feedback from the event, MFA offers the attached comments in regard to the forest and timber-related provisions in the proposed Sugarloaf Overlay. We would also like to extend an invitation to the Planning Commission to learn more about the role of forests and forest management in supporting healthier and more sustainable communities. Maryland's forests are indeed both good for the environment and the economy! MFA would be delighted to facilitate a field trip for Commissioners to view firsthand some of the forestry activities that are currently being practiced in the County. We look forward to hearing from you and hope to be a part of a continuing dialog.

Kind regards,

Beth Hill

--

Beth Hill

Executive Director



Maryland Forests Association

P.O. Box 332

Linkwood, MD 21825

Phone: 410-463-1755

Email: beth@mdforests.org

www.mdforests.org

Maryland's voice for forest, wildlife, and natural resource management.



Maryland Forests Association, Inc.

P.O. Box 332
Linkwood, MD 21835
410-463-1755

Maryland's voice for forest, wildlife, and natural resource management

February 21, 2023

To: Frederick County Planning Commission
RE: Comments on Proposed Forest Management Provisions in the Sugarloaf Overlay

Dear Chairman Hicks and Commissioners,

The Maryland Forests Association (MFA) offers these comments on the Sugarloaf Overlay currently under review by the Frederick County Planning Commission. These comments are directed at the proposed forest and timber-related provisions in the proposed Overlay. Incorporated in 1976, MFA is a state-wide nonprofit 501(c)(3) organization representing the forest supply chain. Our mission is to conserve and enhance forests in Maryland by:

- increasing awareness of the diverse, public benefits of forests;
- supporting the sustainable use of forest resources;
- promoting economic opportunity for forest landowners; and,
- maintaining a viable local forest products industry.

The Maryland Forests Association envisions a future in which vibrant forests are maintained throughout the State, providing diverse economic and environmental benefits to all.

On Wednesday, February 15, 2023, MFA, with assistance from the Maryland Forest Service, hosted the Frederick Forest Forum. Its purpose was to explore the current status and conditions of forests in Frederick County, its forest-based businesses, forest conservation initiatives, and zoning and permitting issues affecting forest management. The program featured three keynote presentations about different aspects of forests in the County and the State, and three panels with Frederick participants discussing, respectively, the local forest-based economy, forest conservation programs and opportunities, and county regulations as they affect timber harvesting. The Forum was very well attended by stakeholders representing various interests including forest landowners, forest operators, environmental advocates, and government officials (county, state, and federal). All of the feedback that MFA has received indicates that attendees and participants profited from the information and exchanges.

While not everyone who attended the Forum might agree with these comments, they are the collective view of the Maryland Forests Association membership and take into consideration the information presented and discussed at the Forum. As such, we urge the planning commission to consider the following:

(1) Everyone shares similar goals to retain and expand forests in the County, and to ensure that they are managed sustainably. The forest area in the County stands at approximately 35 percent (depending on the data source and definition it ranges from 31 to over 40 percent), so forests are a significant land use. We should be striving to expand forest areas and improve their condition. Achieving that aim will have positive effects on protecting biodiversity, water quality, and all of the other environmental and economic attributes forests provide.

(2) MFA believes that there are better ways to achieve sustainable forestry goals than through more burdensome regulations as are being proposed in the Sugarloaf Overlay. Existing state and

county regulatory requirements, which include, among other things, the preparation of a sediment and erosion control plan, and the use of Best Management Practices, already adequately protect water quality and other resources.

(3) In fact, forest landowners within the Sugarloaf Treasured Landscape area evidence very responsible stewardship. These are private property owners that maintain and manage resources with public benefit for County residents.

(4) The proposed requirements for obtaining a timber harvesting permit would add significant cost by necessitating detailed mapping and inventories. The requirements would extend to all zoning categories (agriculture and other) and augment the submissions beyond those currently required even in the more restrictive Resource Conservation zoning.

(5) The county is currently working on a tool to make the mapping aspects of the existing permitting process easier without the operator incurring additional costs. This effort is commendable and negates the need and stated rationale for the proposed mapping requirements.

(6) Proposed restrictions on all tree cutting in streamside buffers removes any options for managing those areas when circumstances might dictate otherwise.

(7) The current Frederick County timber harvesting permitting requirements are unique in that they require a review and approval of the timber harvesting plan by the Frederick County Forestry Board for timber harvesting on Resource Conservation zoned properties. The Frederick County Forestry Board is a voluntary organization. The proposed Sugarloaf Overlay would extend the scope of the Frederick Forestry Board's purview to Agriculture and other zoning, and the proposed change would obligate the Forestry Board to expand its workload without any commitment of funding or formal regulatory authority.

The Sugarloaf Overlay is the first proposed zoning/permitting change associated with a small area plan in Frederick County. Others are soon to follow. It may be that a broader county look at forest management is a more appropriate way to look at forestry issues from a planning perspective rather than target landowners in the Sugarloaf planning area. Thus, we favor the removal of the Sugarloaf Overlay provisions on tree cutting and forestry activities.

Moreover, there is confusion about the prohibition against a sawmill as a permitted activity in the Overlay proposal. The proposed rule would deny the use of a commercial sawmill. The reality is that some sawmills are portable (in that they can be moved) and others, while not portable are operated on a part-time basis. In either case, they can be and often are commercial in that the landowner (usually a farmer) or the operator sells the sawed material to others. This is not uncommon in the state or in the County. We oppose the sawmill prohibition in that it discourages small, rural-based economic activity of the type to be encouraged in the County.

The Frederick Forest Forum highlighted some important facts about forests in Frederick County that are worth noting and should be considered when formulating policies affecting forest landowners, including zoning regulations. The Planning Commission should be aware of and consider these additional factors:

(1) After experiencing several decades of significant decline, the forest area in Maryland has stabilized. New and existing programs to retain forests in Frederick County and elsewhere are having an impact.

(2) U.S. Forest Service Forest Inventory and Analysis (FIA) data show that wood volume growth significantly outpaces removals in Frederick County (by a ratio of 3:1) and that average tree age is increasing. The data suggests that the forest resource in the county can support, and would benefit from, increased utilization.

(3) Eastern forests are carbon sinks and sequester a massive amount of carbon. Even more carbon sequestering is possible through planting new forests, managing existing forests to optimize tree growth, using more wood products (that store carbon) and controlling invasive species to promote natural processes. Forest management in Frederick County is essential to achieving carbon emission reduction goals.

(4) The literature clearly shows that to expand forest area and improve forest conditions through better management, there must be market opportunities for landowners to sell timber

products, including wood from timber stand improvement activities that otherwise would not take place. Harvesting and manufacturing more wood products locally can incentivize forest expansion and improvements. That would include utilizing wood in lieu of fossil fuels where it is practical to do so.

(5) The County should be trying to encourage investment in forest-based enterprises, including exploring opportunities for using biomass energy. Creating markets for the material that is blown down, dying, or of small and low-value, would help improve the growth of more vigorous trees. Currently, most of the wood harvested in Frederick County is destined for out-of-state processing. We should strive to use more wood material locally.

(6) Forest sustainability would be better served with greater consistency among the permitting and zoning requirements in the various counties, not only Frederick. The State has already recognized that need. Attendees at the Forest Forum heard that the [Maryland Department of Planning recently completed “Forestry Guidance to Local Governments”](#) to help counties update their zoning ordinances and suggest opportunities to make them more consistent.

Finally, and most importantly, MFA urges the Planning Commission to take advantage of opportunities to become more informed about the role of forests and forest management in supporting a healthier and sustainable community. MFA would be delighted to facilitate a field trip for Commissioners to view firsthand some of the forestry activities that are currently being practiced in the County.

Respectfully Submitted,



Elizabeth Dickinson Hill
Executive Director

From: Christina Micek <christina.micek@natgeo.com>
Sent: Sunday, February 26, 2023 12:20 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Pleasee Keep the Sugarloaf Plan Boundary at 270

[EXTERNAL EMAIL]

Commissioners ,

Dear Council Members and Commissioners,

I am quite concerned about the county's apparent lack of commitment to the preservation of the Sugarloaf Mountain area. This is a gem of Frederick County, and developer interests seem to be taking priority over our farmland and forests when our area needs more protection. Developers should be helped to find different solutions- ie perhaps building on large impervious surface parking lots, and putting the needed parking under the building.

I-270 should remain the long-recognized boundary and the best line for planning purposes when the commission discusses this plan. No high-density development should occur west of I-270 in the Sugarloaf Plan area.

The decision to change the boundary can not be REVERSED and it has broad impacts on farmland, water quality and forest cover. It is in the best interest of the security of our country and this area to protect these spaces to be more resilient against climate change.

Considering changing the boundary after public commitment to 270 as the boundary will also do irrevocable harm to the transparency of the master plan process.

Please consider the impact of these decisions and keep the development boundary at 270.

Sincerely,
Christina

Christina Micek
christina.micek@natgeo.com
10301 Strathmore Hall St. 402
North Bethesda, Maryland 20852

From: [Nick Carrera](#)
To: [Planning Commission](#); [Council Members](#); [County Executive](#)
Cc: [Gaines, Kimberly](#); [Carrera, Nicholas](#); [Schotz, Andy](#); [Hogan, Jack](#)
Subject: County "compact" on I-270 boundary; purchases despite policy
Date: Monday, February 27, 2023 10:12:45 AM
Attachments: [Planning Commission November 10, 2021,I-270 history.odt](#)
[Natelli Properties, 2003,2021.odt](#)

[EXTERNAL EMAIL]

To Planning Commissioners, County Council Members, and County Executive, 2/27/2023, regarding county policy on the I-270 boundary and later purchases by Montgomery County developer

The draft Sugarloaf Treasured Landscape Management Plan was due to be released March 8, 2021, but release was delayed. When the Plan appeared on July 30, 2021, its eastern boundary had been changed. Instead of following I-270 from Montgomery County to the Urbana interchange, a "Cutout" was introduced that exempted 490 acres from Plan coverage and protection, of which 381 acres were owned by Tom Natelli, a prominent Montgomery County developer.

At their September 15, 2021, meeting to begin consideration of the Sugarloaf Plan, Planning Commissioners noted the strong public response to the appearance of the Cutout, and expressed their own concern that the change had been made secretly. They deleted the Cutout, restoring that portion of the boundary to I-270.

Plans for Urbana region consistently maintain I-270 boundary

At their workshop on November 10, 2021, Planning Commissioners heard a recap of Urbana area plans going back 50 years, supporting I-270 as the line between rural/agricultural/conservation uses to the west and development to the east. Attached is a summary of that recap, with repeated county policy statements restricting development west of I-270.

For your ease and efficiency in consulting the online video of the November 10 meeting, I have indicated key times in the meeting when discussion of the I-270 boundary occurs.

Properties were purchased west of I-270 despite county policy of non-development in that area

The recap of Urbana area plans shows clearly the county's policy of restricting development west of I-270. With that in mind, please note the second attachment, a listing of some purchases by Tom Natelli. Despite existing county policy opposing development in that area, Natelli purchased many agricultural parcels west of I-270 in 2003, and more, as recently as 2021. This can only be regarded as a speculative venture, though not an unusual one, for a developer.

For some Natelli holdings, the SDAT database does not explicitly show him as the owner. Instead, as indicated, owners are listed variously as Fingerboard Road Property, Urbana Investments, and Araby Church Road Property. These entities have the same address as Natelli Communities, 506 Main Street, Gaithersburg, Md., 3rd floor. It is not unusual for

developers to hold property under different names, as Natelli has done, but he still owns them all.

Comment: I am providing the attachments as a factual source of information. I and others may draw upon them in subsequent comments before the Planning Commission and the County Council.

Attachments:

Presentation at 11/10/2021 workshop on Urbana region plans and county policy on I-270 boundary

Property purchases by Montgomery County developer Tom Natelli in 2003 and 2021

Planning Commission, 11/10/2021, F: Tim Goodfellow reviews Urbana Region Plans, I-270 boundary

Video is online at Frederick Government Planning Commission; times are from start of meeting

2:06:20. Goodfellow recalls early plans: 2:06:52, 1970; 2:07:54, 1972, map with rapid rail east of I-270

Comment. From the 1977 Urbana Regional Plan, not included in this briefing, “1. Due to the overwhelming influence of Sugarloaf Mountain, the natural pattern of watersheds, and the nature of the roadway system, only low intensity land uses are best suited west of I-270.”

2:09:03. 1978 Urbana Regional Plan, map showing I-270 as boundary of “Sugarloaf” region

2:09:50. 1978 Plan: “The lands west of I-270 have been planned for low intensity use – farming, parks, woodlands, very low density housing. Sugarloaf Mountain, a recreational and wildlife conservation area, dominates the land uses in the western district.”

2:10:21. 1978 Plan: “1. Due to the dominance of Sugarloaf Mountain and its environment, the pattern of the watershed, the nature of the rural road system, and the relatively undisturbed landscape still existing, only very low intensity uses are best suited west of I-270.”

2:14:52. Commissioner Rensberger adds, “...what Mr. Goodfellow has just shared with us has been told to all of us from that part of the county decade after decade after decade after decade – 270 is the line and that's sort of been the compact in the community; we all knew it and it's always been true.”

2:17:39. 1993 Plan: “maintains the conservation and agricultural character of the west side of I-270”

2:18:03. “The employment areas along I-270 have been clustered around the three proposed interchanges and are confined to the eastern side of I-270” – Goodfellow. Map shows transitway along I-270, with a branch to the east that follows Md 355 through the Urbana PUD and rejoins I-270 transitway just north of Urbana.

Comment. From the November 2002 draft Urbana Regional Plan, not included in this briefing, under Policies: “Maintain the area west of I-270 for conservation rural/agricultural uses to protect Sugarloaf Mountain and other natural resources in the area.”

2:19:15. 2004 Urbana Region Plan: “This Plan continues to maintain the west side of I-270 as Agricultural/Rural and Resource Conservation.”

2:20:06. 2004 Plan policy statement: “Maintain the area west of I-270 for conservation and rural/agricultural uses to protect Sugarloaf Mountain, the Bennett Creek corridor and other natural resources in the area.”

Maps shown from the April 8, 2010, Urbana Land Use Plan, and from the 2012 (current) plan continue to show I-270 as the boundary between rural use to the west and development to the east.

2:23:25. Goodfellow summarizes: “In the 40-plus years of land-use planning 270 has been and is currently the boundary between the rural west and the developed and developing east.”

NATELLI PROPERTIES – Some 2003 and later purchases in the Urbana area

Parcel	Area (acres)	Purchase date	Seller	Price
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West of I-270, Map 105 (these are the parcels along Thurston Rd that were in the Cutout)

0003	142.94	10/01/2003	Kiplinger	3.5M
0038	199.97	10/01/2003	Kiplinger	3.5M
0107	6.586	10/01/2003	Kiplinger	3.5M
0154	29.865	10/01/2003	Kiplinger	3.5M
0161	1.85	10/01/2003	Kiplinger	3.5M

West of I-270, Map 96 (this parcel straddles Park's Mill Rd and extends onto Map 95)

0164	173.51	10/01/2003	Kiplinger	3.5M
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West of I-270, Map 95

0025 (lot 1)	28.08	11/10/2021	Hackett	926,640 ("Fingerboard Road Property")
0025 (lot 2)	25.87	11/10/2021	Hattenburg	853,710 ("Fingerboard Road Property")

East of I-270, Map 96

0008	24.19	10/01/2003	Kiplinger	3.5M
0022	ca.44.93	10/01/2003	Kiplinger	774,800 ("Urbana Investments")
0182	5.08	10/01/2003	Kiplinger	774,800 ("Urbana Investments")
0184	79.57	10/01/2003	Kiplinger	774,800 ("Urbana Investments")

East of I-270, Map 95

0018	152.83*	12/22/2021	Montouri	4M	("Araby Church Rd Property")
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*(in two lots: 56.61 + 96.22)

Notes:

Data come from the SDAT data base.

For parcels in bold, the nominal owner as listed in SDAT is shown in parentheses. Nevertheless, all have the same address as Natelli Communities, 506 Main Street, Gaithersburg, Md.

From: Paul Walker <paul.walker@mdsierra.org>
Sent: Friday, March 10, 2023 9:55 AM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Cc: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>
Subject: Smarter Growth Alliance FC support for Sugarloaf Treasured Landscape Plan Overlay

[EXTERNAL EMAIL]



March 10, 2023

To: Frederick County (MD) Planning Commission, Craig Hicks, Chair

Winchester Hall
12 East Church Street
Frederick, MD 21701

Re: SGAF letter of support for Sugarloaf Treasured Landscape Plan Overlay

Dear Mister Hicks and planning commission members:

The Smarter Growth Alliance of Frederick County is a coalition of local and state organizations with numerous members and supporters concerned with application of smart growth principles in Frederick County. The undersigned groups provide this letter of support for your consideration of the Sugarloaf Treasured Landscape Plan boundaries heretofore defined, as well as approval of the full overlay at the earliest time possible.

As you confirmed last year by your approval of the Sugarloaf Treasured Landscape Management Plan and Overlay boundaries, I-270 is the long-recognized boundary between development to the east and preservation to the west and remains by far the best line for planning purposes. The Plan must continue to maintain the west side of I-270 as Agricultural/rural and Resource Conservation. No high-intensity development should occur west of I-270 in the Sugarloaf Plan area.

If the I-270 boundary is crossed and more intense development is allowed in the Sugarloaf Plan area, there will be a race to the bottom. Rural neighbors will opt to appeal current zoning, cash out and move rather than tolerate the overwhelming impacts of commercial, industrial or high-density development. As Sugarloaf Alliance has demonstrated (<https://www.sugarloaf-alliance.com/amazon-data-centers>), and articles in the Frederick News Post confirmed (January 27, 2023, "Amazon to invest \$35B, expand data center campuses," and Feb. 9, 2022, Amazon proposal was worth billions"), Amazon Web Services had intended to build one or more data

centers to the west of I-270 in the Sugarloaf Plan area. We continue to be concerned about the potential placement of industrial facilities in the Sugarloaf Plan preservation area.

As we know from watching the development of Quantum Loophole's large data center campus near Adamstown, the data center goldrush is on. We respectfully request that the County Planning Commission consider the balance between allowing some industrial development on a brownfields site and the residents' desire for preservation in appropriate and very important natural areas of the County.

We understand that the county is interested in data centers because data centers provide property tax dollars and have limited new demands on schools and roads, but the equation is not that simple. Data centers:

- do not pay business equipment taxes in the county or in Maryland, as they do in Virginia;
- consume large amounts of power and water, leading to new power line and access installations;
- create run-off and surface water impacts due to their enormous impervious surface areas;
- produce noise, light, and other negative community impacts.

Frederick County is one of only 49 counties in the nation to earn **AAA** bond ratings from all three bond rating agencies in 2021 and is not a "poor" county in terms of resources, whether financial or environmental. The keys to smart development are to maintain a sustainable balance of development and preservation and to scrutinize realistically the actual long-term costs and benefits of development. Livable Frederick provides for development in many nearby growth areas including the South Frederick Triangle, the Urbana Growth Area and others. The balance is to provide preservation in the Sugarloaf Plan area and extend the good preservation work of the Agricultural Reserve in Montgomery County, which the Plan area abuts.

We repeat: the Sugarloaf Treasured Landscape Plan area must be preserved, and the Overlay should be approved to protect the Sugarloaf area from industrial or other development inconsistent with the agricultural and rural nature of the Plan area. A full Overlay will redeem the county's half-century commitment to preservation; to renege on that long-standing "compact" with Sugarloaf area residents would be dereliction.

We understand that data center owners and developers need redundancy and security and want to maximize transmission speed. We see that the Planning Commission has a stark choice. The Commission can vote either to prevent data center development in the Sugarloaf preservation area by supporting the Overlay to the I-270 Plan boundary, hopefully encouraging siting at more appropriate industrial-zoned areas like the former East Alcoa site, or the Commission can choose to open the rural southern part of the County to an unbridled rush of data center sites as the developers grasp for more land.

The Sugarloaf Treasured Landscape area, including the Monocacy National Battlefield, is, has been, and should continue to be an area designated for preservation, not an area where data centers, other industrial facilities or dense developments can be constructed without regard to environmental and community concerns. Community concerns include:

Preservation

The approved Sugarloaf Plan and its proposed Overlay District are preservation plans, not development plans. Open space, including agricultural, forested and conservation lands, is not merely undeveloped space. In the context of climate change, as well as the county's continued need to control and balance development pressure, open space should be considered the optimal use of the entire Sugarloaf Treasured Landscape area. The I270/80 interchange has been called the "Gateway to Sugarloaf Mountain" and as such is under very heavy development pressure. It needs MORE protection, not less. The land east of Route 80 is at the head of the watershed into the Sugarloaf area. Contaminants associated with development, such as heavy metals from vehicle traffic and sediments and discharge from whatever infrastructure might be built, would negatively impact the quality of streams as they flow into the protected area.

Monocacy Battlefield

If high-density development is allowed west of I-270, the Monocacy National Battlefield will be further threatened. There is only one property (and 600-700 yards of distance) currently between developer-owned land on Route 80 near Park Mills Road and the Park boundary. The developer continued to acquire property in this area after this planning process commenced.

Sugarloaf Mountain

The mountain is a unique and irreplaceable feature of southern Frederick County. The Sugarloaf Plan and Overlay are designed to protect the mountain, its rural environment, and its natural resources, for now and the future - including after the land trust expires in 2046.

Transparency

The developer and the county have been secretive about their development discussions and intentions for the properties on the west side of I-270 in the Sugarloaf Plan and Overlay area. Residents and those who love the Sugarloaf area have a right to know what has been considered and what is being planned. County Planners and residents put a lot of work into the Livable Frederick Master Plan and the Sugarloaf Plan is the first of several small area plans to go through the process. As with the initial version of the Plan you recommended last year, please continue to listen to the residents, hold the line at 270 for the Overlay, and do your best to make decisions in a thoughtful and transparent way to re-establish the Sugarloaf Planning process as a good model for the plans that are to follow.

Again, as you confirmed last year by your approval of the Sugarloaf Treasured Landscape Management Plan and Overlay boundaries, I-270 is the long-recognized boundary between development to the east and preservation to the west. The Plan and Overlay must continue to maintain the west side of I-270 as Agricultural/rural and Resource Conservation. No high-intensity development should occur west of I-270 in the Sugarloaf Plan area.

Thank you for moving this forward to final resolution at the earliest possible time, and, for hearing the position of the citizens and residents of the area.

Sincerely,

Clean Water Linganore

Citizens for Responsible Growth ,
Climate Change Working Group,
Friends of Rural Roads,
Montgomery Countryside Alliance,
Plant the Light,
Potomac River Keeper,
Sierra Club, Catoctin Group,
Sugarloaf Alliance,
Sugarloaf Citizens Association,
Sunrise Movement Frederick,

CC: Honorable Frederick County Council: Council
President Brad Young, Council Vice-President Kavonté Duckett, Council Member Steve
McKay, Council Member Renee Knapp, Council Member MC Keegan-Ayer, Council Member
Mason Carter, and Council Member Jerry Donald

Honorable Frederick County Executive Jessica Fitzwater

From: Marc Imlay <marc.imlay@mdsierra.org>
Sent: Thursday, March 2, 2023 5:46 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Keep the Sugarloaf Plan Boundary at 270

[EXTERNAL EMAIL]

Commissioners ,

I am concerned about the county's apparent lack of commitment to the preservation of the Sugarloaf Mountain area.

I-270 should remain the long-recognized boundary and the best line for planning purposes when the commission discusses this plan. No high-density development should occur west of I-270 in the Sugarloaf Plan area.

The decision to change the boundary can not be taken back and it has broad impacts on farmland, water quality and forest cover.

Considering changing the boundary after public commitment to 270 as the boundary will also do irrevocable harm to the transparency of the master plan process.

Please consider the impact of these decisions and keep the development boundary at 270.

Marc Imlay
marc.imlay@mdsierra.org
2321 Woodberry Drive, Bryans Road, MD, USA 20616
Bryans Road, Maryland 20616

From: Donna Sawyer <info@email.actionnetwork.org>
Sent: Thursday, March 2, 2023 7:29 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Keep the Sugarloaf Plan Boundary at 270

[EXTERNAL EMAIL]

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Please consider the impact of these decisions and keep the development boundary at 270.

Donna Sawyer
donnalcsawyer@gmail.com
2213 Clark Pl
Silver Spring, Maryland 20902

From: Megan Benton <info@email.actionnetwork.org>
Sent: Friday, March 3, 2023 6:05 AM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Keep the Sugarloaf Plan Boundary at 270

[EXTERNAL EMAIL]

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Megan Benton
half_shekel@yahoo.com
20407 Peach Tree Rd
Dickerson, Maryland 20842

From: Diana Yun <info@email.actionnetwork.org>
Sent: Thursday, March 2, 2023 2:36 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Keep the Sugarloaf Plan Boundary at 270

[EXTERNAL EMAIL]

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Please consider the impact of these decisions and keep the development boundary at 270.

Diana Yun
honeysuckledreams@gmail.com
1613 Auburn Ave.
Rockville, Maryland 20850

From: Eric Cronquist <secq@earthlink.net>
Sent: Thursday, March 2, 2023 2:44 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Keep the Sugarloaf Plan Boundary at 270

[EXTERNAL EMAIL]

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Eric Cronquist
secq@earthlink.net
19920 West Hunter
BEALLSVILLE, Maryland 20839

From: Hazel Huey <info@email.actionnetwork.org>
Sent: Thursday, March 2, 2023 2:51 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Keep the Sugarloaf Plan Boundary at 270

[EXTERNAL EMAIL]

Commissioners ,

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Hazel Huey
hp88huey@gmail.com
1200 New York Ave NW
Washington DC, District of Columbia 20005

From: Naomi Yount <info@email.actionnetwork.org>
Sent: Thursday, March 2, 2023 5:11 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: Keep the Sugarloaf Plan Boundary at 270

[EXTERNAL EMAIL]

Councilmembers ,

I am concerned about the county's apparent lack of commitment to the preservation of the Sugarloaf Mountain area.

I-270 should remain the long-recognized boundary and the best line for planning purposes when the commission discusses this plan. No high-density development should occur west of I-270 in the Sugarloaf Plan area.

The decision to change the boundary can not be taken back and it has broad impacts on farmland, water quality and forest cover.

Considering changing the boundary after public commitment to 270 as the boundary will also do irrevocable harm to the transparency of the master plan process.

Please consider the impact of these decisions and keep the development boundary at 270.

Naomi Yount
naomigd@hotmail.com
15101 Falconbridge Ter
North Potomac, Maryland 20878

From: ELLEN KREIS <info@email.actionnetwork.org>
Sent: Friday, March 3, 2023 9:39 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: Keep the Sugarloaf Plan Boundary at 270

[EXTERNAL EMAIL]

Councilmembers ,

We are writing to you as a Frederick County citizens who lives within the area the Sugarloaf regional plan concerns. And although I am sending you what is mostly a pre-written letter I'm sure you've seen before my hope that you will keep the Sugarloaf plan boundary at 270 for all the reasons stated below is 100% genuine. The beautiful, unique and treasured Sugarloaf region should not be ruined for the benefit of a handful of wealthy large landowners.

I am concerned about the county's apparent lack of commitment to the preservation of the Sugarloaf Mountain area.

I-270 should remain the long-recognized boundary and the best line for planning purposes when the commission discusses this plan. No high-density development should occur west of I-270 in the Sugarloaf Plan area.

The decision to change the boundary can not be taken back and it has broad impacts on farmland, water quality and forest cover.

Considering changing the boundary after public commitment to 270 as the boundary will also do irrevocable harm to the transparency of the master plan process.

Please consider the impact of these decisions and keep the development boundary at 270.

Sincerely,

Ellen Kreis and Douglas Pierce
1189A Della Rd
Dickerson, MD 20842

ELLEN KREIS
getelleny@aol.com
1189A DELLA RD
DICKERSON, Maryland 20842

From: [Blanca Poteat](#)
To: [Planning Commission](#)
Cc: [Council Members](#)
Subject: Sugarloaf Rural Heritage Overlay Zoning District
Date: Friday, March 10, 2023 5:05:37 PM

[EXTERNAL EMAIL]

March 10, 2023

To: Frederick County Planning Commission
From: Blanca Poteat, Sugarloaf Mountain Road

Subject: Sugarloaf Plan Overlay, Version 2 – Support and Changes

The Sugarloaf Rural Heritage Overlay Zoning District is intended to implement and complement the approved Sugarloaf area preservation plan.

The Overlay should include the entire approved Sugarloaf Plan area. If 25,000 sf building size is substituted for previous 15,000 sf size, apply the Overlay to the entire Sugarloaf Plan area including the commercial properties at Route 80 and I270 interchange.

To adhere to the Overlay’s “purpose and intent” statement which confirms the County’s commitment to preserve and protect the County’s southwest corner (less than 5% of the County’s total area), I urge you to make the following changes to Overlay version 2 (TRACK CHANGES version 3-07-23):

1. 1-19-7.710 Development in the Sugarloaf Rural Heritage Overlay Zoning District (page 2)

(D) To ensure safety and full consideration of the impact on the transportation network, natural resources, and the rural character of the Overlay District, site development plans must be submitted for the development of: a Wholesale Nursery if a structure or building or greenhouse or other indoor growing facility is proposed. Site development plans will be reviewed by the Planning Commission. Retain:

(1) A Wholesale Nursery if a structure or building or greenhouse or other indoor growing facility is proposed;

(2) An Agritourism Enterprise that proposes a new structure or building intended to be used as a farm museum, for agricultural products or skills classes, or as a picnic and party facility.

2. (B) Size of Structures and Buildings (pages 3-4)

-If 25,000 sf building size is substituted for previous 15,000 sf size, apply the Overlay to the entire Sugarloaf Plan area including the commercial properties at Route 80 and I270 interchange.

Allow exemptions only if the structure or building is used solely for:

(a) Agricultural Activity, as defined in 1-19-11.100;

(c) Agricultural value added processing;

(p) Feed and grain mill

(q) Agricultural products processing

3. 1-19-7.730 Tree Cutting and Forestry Activities (pages 4-5)

-Retain the requirements in the previous version of the Overlay.

The Sugarloaf Plan forestry-related requirements serve as an important model for the County’s other “treasured landscape” land use plans as well as for county-wide forestry and woodland sustainability practices in the context of climate change.

4. 1-19-7.740 Prohibited Uses (page 6)

-Retain prohibitions on rodeos.

-Update prohibition on spring water harvesting to specify “for commercial purposes.”

5. Article X: Optional Methods of Development (page 8)

Solar Facility, Commercial Floating Zone

-Add: Solar facilities are only permitted on soils rated class 6 or below.

This added limit is intended to prevent floating zone proliferation of solar facilities on agricultural and conservation land, including as interim land uses on speculative- and developer-owned AG and RC properties in anticipation of rezoning and/or more intensive development. Solar facilities should

not be permitted to reduce the County's thriving agricultural economy or productive farm acreage, the most of any county in Maryland.

6. Article XI: 1-19-11.100: **Definitions** (page 9)

-Retain: Timber Harvest Streamside Management Zone

The Sugarloaf Plan forestry-related requirements serve as an important model for the County's other "treasured landscape" land use plans as well as for county-wide forestry and woodland sustainability practices in the context of climate change. (see #3 above)

Limited Outdoor Sports Recreation Facility

-Add: requirement for registration to control and limit event attendance to manage local traffic and noise impacts.

-Identify and add: county enforcement responsibility and process.

-Delete: Rodeos

Lodge, Private Park

-Restrict accommodations to rooms for 30 or less transient guests (15 private rooms or cottages).

-Specify that all new and existing facilities associated with private park lodging must adhere to all applicable County building and health and safety codes and inspections regarding water and septic facilities, ADA accessibility, lighting, etc.

Thank you and best regards,

Blanca Poteat

Sent from [Mail](#) for Windows

From: [Margaret7071](#)
To: [Planning Commission](#)
Cc: [Council Members](#)
Subject: Preservation goals of Sugarloaf plan
Date: Sunday, March 12, 2023 8:46:52 PM

[EXTERNAL EMAIL]

Members of the planning commission,
I am writing to encourage you to support the preservation goals of the Sugarloaf plan and overlay district as described in June 2022.
Please do not hesitate to preserve the beauty of this area for future generations. Once lost, natural beauty is often gone forever. Nature provides an opportunity for psychological restoration. Nothing is more valuable in this troubled world.
Thank you,
Margaret Kelley

Sent from my iPhone

From: [Steve Poteat](#)
To: [Planning Commission](#)
Cc: [Council Members](#); [County Executive](#)
Subject: Comments on Sugarloaf Rural Heritage Overlay Zoning District, TRACK CHANGES Version 03-07-2023
Date: Sunday, March 12, 2023 8:44:08 PM

[EXTERNAL EMAIL]

Comments on Staff Suggestions for Planning Commission Meeting on March 15, 2023 Concerning Modifications to Chapter 1-19 (Zoning), Article VII: Supplementary District Regulations, Division 7, Sugarloaf District by Steve Poteat, Sugarloaf Mountain Road, March 12, 2023.

Overall Comments

It should be recalled that the originally proposed Sugarloaf Rural Heritage Overlay Zoning District was found acceptable to both the Planning Commission and the County Council. However, the County Council in a politically charged environment decided not to act because of objections by Stronghold Inc. who threatened to close the Sugarloaf Mountain Park to the public if the Overlay Zone was adopted. Placing aside Stronghold's objections, the Sugarloaf Plan had already been modified by the County Council to address the great majority of objections raised by the public. For these reasons adoption of the Overlay Zone as originally proposed should proceed by exempting Stronghold properties, if necessary, from the Overlay Zone, unless there is a change of attitude by the County Council.

The current staff suggestions seem to be responses to the lowest common denominator by deleting or modifying any issues raised by anyone in order to get the Sugarloaf Plan "finished" so the Planning Commission can move on to the more important issue, the South Frederick Corridors Plan. Many of the suggested changes do much damage to the Sugarloaf Treasured Landscape Management Plan which is a PRESERVATION plan according to the Livable Frederick Master Plan.

The most important outstanding issue regarding the Overlay zone is the coverage or Overlay Boundary. Simply put, the Overlay zone must include the entire Sugarloaf Treasured Landscape Management Plan area as adopted by the County Council in October of 2022: Interstate I-270 on the northeast, Monocacy River on the West and Montgomery County on the south. Any modification of the northeastern boundary along I-270 will lead to inexorable residential, industrial and commercial growth into the foothills of Sugarloaf Mountain, rapidly destroying the PRESERVATION objectives of the Sugarloaf Treasured Landscape Management Plan. The only boundary that can hold is I-270 as has been promised by the County for over 50 years. The developed portion of the I-270 Corridor in Frederick County has always been the area

between I-270 and Maryland 355. In fact, there are 1500 acres of developable land in the Urbana Growth Area on the east side of I-270 as delineated in the Livable Frederick Master Plan. Don't destroy the Sugarloaf Treasured Landscape Management Plan to satisfy the speculations of development interests.

Comments on Staff Suggestions for Planning Commission Meeting on March 15, 2023 Concerning Modifications to Chapter 1-19 (Zoning), Article VII: Supplementary District Regulations, Division 7, Sugarloaf Specific Comments: based on the TRACK CHANGES Version 03-07-2023.

1. Page 2, lines 16-18, **Agritourism:** Deletion of site plan requirements for Agritourism is completely inconsistent with recent experiences with the relocation of the Summers Farm to Middletown. Deletion of a site plan requirement allows no consideration of setbacks to protect the adjacent community, building placements and entrance and other transportation considerations. It should be acknowledged that many farm agritourism efforts are effectively amusement parks and should be regulated as such and are not consistent with the PRESERVATION goals of the Sugarloaf Plan.
2. Page 3, lines 12-14. **Site entrances:** In a PRESERVATION setting site entrances are as important as the buildings. This requirement has not received any significant negative comment. Why is this change being made? It should remain in this PRESERVATION plan.
3. Page 4, lines 8 and 12: **Building size:** there is no rationale given for this change in scale from 15,000 square feet to 25,000 square feet. A review of alternative building sizes was presented demonstrated during the Sugarloaf Plan discussions and the majority opinion of the Planning Commission was that very few existing buildings exceeded the 15,000 square foot guideline. A generous exception clause is provided in the text and should address any special circumstances. The 15,000 square foot guideline is consistent with the PRESERVATION goals of the Sugarloaf Plan.
4. Pages 4 and 5: **Paragraph 1-19-7.730. TREE CUTTING AND FORESTRY ACTIVITIES:** Deletion of this entire paragraph of the Bill is completely inconsistent the PRESERVATION goals of the Sugarloaf Plan. To suggest that this Paragraph be deleted so that a county-wide proposal can be made does not recognize the three special preservation areas recognized in the Livable Frederick Plan: Sugarloaf Mountain, South Mountain and Catoctin Mountain areas. These forested mountain areas are unique and are meant to be planned differently as noted in the Livable Frederick Master Plan. To postpone the additional protections called for in this Paragraph would needlessly endanger the Sugarloaf region forest lands until the staff and Planning

Commission find time at some point in the future to consider this county-wide. Additionally, County permit review staff will have more appropriate guidelines to protect the Sugarloaf region in the meantime. Experience in the Sugarloaf region could be used as a test case for application county-wide. This PRESERVATION effort should remain in the Sugarloaf Plan.

5. Page 6, lines 1-31, Paragraph 1-19-7.740. **PROHIBITED USES:** The modifications to the Prohibited Uses are confusing and in some cases wrong. Lines 2 and 3 state that these uses are prohibited in only the Agricultural Zone. Limiting this discussion to only Agriculture zoned land is misleading and would lead to confusion on the part of the reader, thinking these uses are allowed in the Resource Conservation zoned land despite the fact that these uses are already prohibited in the Resource Conservation land. The discussion of Prohibited Uses is key element in this PRESERVATION master plan.

6. Page 6, line 4: **Sawmills** should only be temporary and portable to be consistent with the PRESERVATION goals of the Sugarloaf plan. See discussion below under item 10.

7. Page 6, lines 5 and 8: “**Springwater**” and **rodeos** should remain on the prohibited list. Springwater harvesting and storage should only be for the uses of the property owner, this should not become a commercial operation. Also allowing rodeos is inappropriate since these inevitably become commercial activities. Commercial springwater harvesting and rodeos are inconsistent with the PRESERVATION goals of Sugarloaf Plan.

8. Page 6, lines 21 to 24: **Prohibited uses** in the Resource Conservation Zone is confusing. As currently drafted it appears sawmills and shooting ranges are the only uses prohibited in the Resource Conservation zone when in fact the uses on lines 4-20 are also prohibited in the Resource Conservation zone.

9. Page 6, lines 26-28: **Definitions** section, the exempted private park use in Overlay zone needs revision. The private park exemption should be at least 1000 acres instead of 100 acres. In order to be exempted from the Overlay zone the private park needs to be of considerable size. It is not hard to find parcels in the 19,700 acres of the Sugarloaf planning area of 100 acres. A patch-work of private parks exempted from the Overlay zone would be inconsistent with the PRESERVATION objectives of the Sugarloaf Plan as a multitude of private parks pursue their various concepts of private parks in what would be a very limited area. A minimum of 1000 acres would make the park objectives more feasible on a larger scale.

10. Page 8, ARTICLE X: OPTIONAL METHODS OF DEVELOPMENT, DIVISION 7. SOLAR FACILITY, COMMERCIAL FLOATING ZONE DISTRICT , Paragraph 1-19-10.700. SOLAR FACILITY- COMMERCIAL

ZONE: After line 16 add the following:

Solar facilities are only permitted on soils rated class 6 or below. This added limit is intended to prevent floating zone proliferation of solar facilities on agriculture and conservation land, including as interim land uses on speculative-and developer-owned Agriculture and Resource Conservation zoned lands in anticipation of rezoning and/or more intensive development. Solar facilities should not be permitted to reduce the County's thriving agricultural economy or productive farm acreage, the most of any County in Maryland.

11. Page 9, Article XI Definitions, Paragraph 1-19-11.100. DEFINITIONS. lines 5-21:

a. **Timber Harvest Streamside Management Zone:** This definition should not be deleted for the reasons as cited in Note 5 above. Forestry management is an integral part of the Sugarloaf PRESERVATION plan and should not be delayed until some uncertain future.

b. **Sawmill, Temporary:** This definition needs to be modified to ensure this does not become a de facto permanent facility. Drying, finishing or shipping lumber can be a long-term operation especially drying of lumber. Commercial firewood processing is a long-term effort and becomes a permanent activity. A time limit should be placed on the "Sawmill, Temporary" of no longer than one year.

c. **Limited Outdoor Sports Recreation Facility:** "Limited Outdoor Sports Recreation Facility" needs to be either deleted or heavily modified. A limited outdoor sports recreation facility sets a strong precedent for large scale active recreation as opposed to the conservation and PRESERVATION objectives of the Sugarloaf plan. It is not hard to envision a complex of 30 soccer fields such as has been built in Germantown with tremendous sound, traffic and stormwater problems. Stadium seating and lighting is not essential to create the traffic and environmental impacts: only one of the fields at the Germantown Soccerplex has lighting and stadium seating. A limit of 81,000 square feet, the size of one large soccer field, is the maximum appropriate size in the Sugarloaf PRESERVATION plan.

d. **Lodge, Private Park:** This definition is much too broad and should be limited in scale if allowed at all. Park lodges in this region are usually only offered in remote locations such as western Maryland and West Virginia. This is not the case for the Sugarloaf Plan area. Folks who want to visit Sugarloaf hardly need a nearby place to stay given the accommodations available in Frederick. A private park lodge could easily commercialize the Sugarloaf area. As written, it could lead to subdivision-type development since no restrictions

are placed on design or area of coverage. A stand-alone lodge would create significant potential for ground water and stream pollution since no connections to public water and sewer would be available. Frederick County needs no more small wastewater plants discharging into the high quality streams around Sugarloaf Mountain. Private Park Lodges are simply inconsistent with the PRESERVATION objectives of the Sugarloaf plan.

Sent from [Mail](#) for Windows

From: [Nick Carrera](#)
To: [Planning Commission](#); [Gaines, Kimberly](#)
Cc: [Council Members](#); [County Executive](#); [Schotz, Andy](#); [Hogan, Jack](#); [Carrera, Nicholas](#); [Carrera, Alexandra](#); [Carrera, Johnny](#)
Subject: Comments on Sugarloaf Plan Overlay District
Date: Monday, March 13, 2023 8:26:55 AM
Attachments: [PlanComm email March 13 2023 R2.odt](#)

[EXTERNAL EMAIL]

I attach my comments on the Overlay being considered by the Planning Commission. I also copy the text below, in case it is easier for you to handle that way instead of as an attachment.

Best regards,

Nick Carrera

Begin text of the document also attached to this email:

PlanComm email March 13, 2023, R2

Comments to the Planning Commission regarding the Overlay for the Sugarloaf Plan
from Nicholas Carrera, 2602 Thurston Road, Frederick 21704

The Livable Frederick Master Plan (LFMP) called for a Sugarloaf Plan. That Plan, aiming to preserve the present rural/conservation status of county land between I-270 and the Monocacy River has been approved. The LFMP also calls for an Overlay District to ensure that the Plan's "nice to be preserved" goal becomes a "will be preserved" fact. Straightforward reasoning says the way to preserve the Plan area is to cover it with the Overlay, but some don't reason that way. Those who sought only partial coverage for Plan may now seek only partial coverage for the Overlay. This would undo the unity of the Plan area, leaving it open to development and defeating the goal of the Plan.

Opposition to the Plan's eastern boundary, I-270, has been especially intense. I recap comments I sent the Commission on January 24 on why Plan and its Overlay should have that same boundary.

Simple logic: The aim of the Sugarloaf Plan is to preserve the land covered by the Plan; it doesn't say, "Preserve this, but don't preserve that." The LFMP called for an Overlay to enforce the goal of the Plan; logically, therefore, the Overlay should ensure preservation over the entire Plan area.

Changing the I-270 boundary would break faith with citizens: In Urbana region plans going back to 1977, I-270 has stood as the western boundary for intense development. It has become a "compact" between county and those living west of I-270.

A different boundary is unsustainable: If one person is allowed to develop land west of I-270, how can you keep others from seeking the same freedom to cash in? Where then will the line stop? In a generation or two, the view from Sugarloaf Mountain might be a landscape of housing developments, shopping malls, and data centers – a poor legacy for our grandchildren.

Development west of I-270 would strain county resources: Dense development or data centers would require the county to extend water, sewer, and power services west of I-270.

A different boundary is not defensible: I-270 has been the boundary for decades. With four lanes, shoulders, and a median it is an easily-recognizable feature. When Thurston Rd was tried as the boundary, it failed the laugh-test. Thurston is barely two lanes, with no shoulders. It has sharp turns and steep hills. No persuasive rationale was offered, and the change brought a strong whiff of favoritism. Any boundary but I-270 would have the same problems.

In summary, the Overlay should preserve the entire Sugarloaf Plan area. It is logical that it do so; it maintains faith with county citizens; it sustains the goals of the Plan; it avoids strain on county services; and it is defensible.

A comment now on the changes suggested recently for specific provisions of the Overlay. The Commission had approved the previous Overlay last fall, and the Council did not ask for detail changes, they only considered coverage. There should be no rush now to change Overlay provisions, just because one person or another suggested them. Insist on seeing well-argued rationales for any changes, and consider if they are truly reasonable.

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from Nicholas Carrera, 2602 Thurston Road, Frederick 21704

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**FREDERICK
COUNTY
ASSOCIATION OF
REALTORS®**

Frederick County Division of Planning and Permitting
30 North Market Street
Frederick, Maryland 21701

March 10, 2023

Re: Sugarloaf Area Plan Overlay

Dear Members of the Planning Commission,

The Frederick County Association of Realtors would like to go on record against any further consideration of an overlay being added to the Sugarloaf Treasured Landscape Management Plan.

Since the time that the overlay was remanded back to the Planning Commission for further consideration there has been little modification to the plans for the overlay.

We have tried to understand the need for the implementation of this restrictive tool that will change the rights of property owners within the affected area.

The following is the basis for our position:

- 1.) Any proposed change of use within the overlay area, will require review and consideration by the Planning Commission. It is within the powers of the Commission to deny or modify any proposal.
- 2.) The County can designate the area as a priority preservation area, giving any property owner wanting to preserve and protect what they own, the ability to do so.
- 3.) The State of Maryland offers a Conservation Reserve Enhancement Program that also allows for a perpetual conservation agreement.
- 4.) The Creek Releaf program that Frederick County offers allows for reforestation for those that would like to provide this type of conservation easement on the property that they own.
- 5.) It is our opinion that the remanding of the overlay to the Planning Commission, that prior to action taken by the Planning Commission to send a recommendation back to the County Council for consideration that a mailed public notice be provided to the property owners within the area of the overlay. This will allow for property owners not previously aware of the proposed changes created by the overlay to have an opportunity to understand how the overlay will impact their property.

With all of the available alternatives at the Planning Commission's disposal, we firmly believe that any additional restrictions are not necessary.

Thank you in advance for your attention to our concerns,

Amos Martin
President
Frederick County Association of Realtors

From: msimpson2005_bennettscreekfarm.com
To: [Planning Commission](#)
Subject: Please do not weaken the Sugarloaf Overlay Plan
Date: Monday, March 13, 2023 10:55:21 AM

[EXTERNAL EMAIL]

Hello,

I have lived on Thurston Road west of I-270 for nearly 13 years. I have spoken to you before about the "fragility" of this area to the effects of development.

The Sugarloaf Mountain area deserves to be protected, not developed. Please do not allow developers to build inappropriate businesses and large buildings in this area.

Doing so will create a cascade of land owners selling properties to get away. The Sugarloaf Mountain area on the Frederick County side will become a joke.

I also worry about the impacts of development on the water quality of this area. We all get our water from wells. Please do not allow developed businesses to spoil the water quality of the streams here.

Please keep the verbiage of the original Overlay Plan intact. Do not weaken it. We need this overlay to protect the Sugarloaf Mountain area, not to develop it!

Thank you, Margy Simpson
2149 Thurston Road
301-520-7113