

From: goldbergn@gmail.com <goldbergn@gmail.com>

Sent: Tuesday, May 16, 2023 11:02 AM

To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>

Cc: County Executive <CountyExecutive@FrederickCountyMD.gov>

Subject: Support the full "overlay zoning"

Please support the full "overlay zoning" covering the entire area encompassed by the Sugarloaf Mountain Treasured Landscape Management plan the County Council approved last December. Sugarloaf is a treasured asset for Frederick County and for the Nation.

Sincerely,

Robert Goldberg

From: [Jean Cavanaugh](#)
To: [Planning Commission](#)
Cc: [Council Members](#); [County Executive](#)
Subject: Preserve Sugarloaf Treasured Landscape
Date: Tuesday, May 16, 2023 6:54:42 PM

[EXTERNAL EMAIL]

Dear Planning Commission,

Please support the full overlay zoning covering the entire area encompassed by the Sugarloaf Mountain Treasured Landscape Management plan the County Council approved last December.

Jean Cavanaugh and Mark Pascal
7108 Ridge Crest Drive
Frederick, MD 21702

From: ultratom1@aol.com
To: [Planning Commission](#)
Cc: [Council Members](#)
Subject: Sugarloaf and surround acres in Frederick Co.
Date: Wednesday, May 17, 2023 2:20:26 PM

[EXTERNAL EMAIL]

To all those who will be reviewing this matter today:

Once the protected areas around this mountain and other nearby lands in southern Frederick Maryland are developed , it will never come back to its original state.

Beautiful land such as that surrounding Sugarloaf which will serve future generations is having protections removed or eased every day across the nation.

Too often we do not realize what we have until it is gone. I urge you to consider keeping this land protected.

Tom Rojas
Beallsville MD

From: [Maggie Newcomer](#)
To: [Planning Commission](#)
Cc: [Council Members](#); [County Executive](#)
Subject: Please support the Full Overlay Zoning
Date: Wednesday, May 17, 2023 12:22:56 PM

[EXTERNAL EMAIL]

Dear Commissioners, Council members and County Executive Fitzwater

I am a 40 year Montgomery County resident. Sugarloaf Mountain and the surrounding farmlands are my absolute favorite place to go to be calm and feel peace. I implore you to please support the full “overlay zoning” covering the entire area encompassed by the Sugarloaf Mountain Treasured Landscape Management plan the County Council approved last December. Please retain the beauty of this area for my grandchildren and the generations to come.

Sincerely,

Marguerite Newcomer
Germantown, MD

From: [Peter Eeg](#)
To: [Planning Commission](#)
Subject: Please support the full overlay zoning for the Sugarloaf mountain agricultural zone
Date: Tuesday, May 16, 2023 10:20:07 PM

[EXTERNAL EMAIL]

Commissioners, please fully support and implement the full overlay zoning for the Sugarloaf mountain stricter zoning and agricultural usage.

Peter H Eeg DVM
16400 West Old Baltimore Rd
Boys Md 20841
3019160144
“At the feet of Sugarloaf”

Dr Peter Eeg's iphone

From: [Lauren Greenberger](#)
To: [Planning Commission](#)
Cc: [Cherney, Ragen](#)
Subject: Re: Sugarloaf treasured landscape
Date: Wednesday, May 17, 2023 7:05:39 AM

[EXTERNAL EMAIL]

Lauren

> On Feb 14, 2023, at 8:52 AM, Lauren Greenberger <lgreenberger@hotmail.com> wrote:

>

> Dear Planning Commissioners,

>

> I have a cattle farm at the foot of Sugarloaf Mountain. My cows graze my neighbors land as well. We also both grow hay and have planted large stream buffers of trees and shrubs to protect the creek that runs through our properties . My neighbor to the north has a thriving CSA with fruit vegetables, eggs, and meat goats. To the east and west, my neighbors have corn, soy beans, and winter wheat.

> And when friends and family visit from around the county and the state, we often go for a picnic on Sugarloaf Mountain, and admire the spectacular view shed from the mountaintop.

> This truly is a Treasured Landscape for both Frederick and Montgomery counties as well as all Marylanders.

>

> For those of us who farm, this would just plain not be possible without the protective zoning that is in place now. But beyond the value for the agricultural industry, there is a unique value to this area to all of the residents, near and far that should be preserved. Just as there are no elephants, giraffes, and zebras anywhere but on the African savanna, there is only one Sugarloaf Mountain in Maryland. African countries, like Zambia have recognized the uniqueness of having these large animals, are protecting them now, and have developed a thriving national tourist industry around them, allowing the land and natural resources to be protected and the citizens to all have good livelihoods. The Sugarloaf Mountain area is also a precious place that deserves special protection for all of us to enjoy into the future. I fully recognize that development is necessary in certain areas, but you, as planning commissioners, very wisely, studied this area over the past three years, and determined how unique this particular area is and chose to protect it for all of us.

> I know it is hard to stand up to pressure from a few businesses that want to exploit this land and carve out commercial and or dense residential development in this rural landscape.

> I am writing to beg you to protect this particular area, not only for the farming that we are doing, but for all residents, near and far to have this place to come to, enjoy and marvel at. There is nothing else like it around.

> So please, honor the County Council's vote to maintain the zoning within the entire Sugarloaf area boundary and pass the conditions of the Overlay zone to protect this area from encroachment by large businesses or other enterprises, and protect our forests, slopes and streams.

>

> Thank you for all the hard work you have put into this. Our future is in your hands. Please, please protect it,

>

> Lauren Greenberger

> Daybreak Farm

> Dickerson

>

From: [Justin Matney](#)
To: [Planning Commission](#)
Subject: Planning Commission - Protect our Water
Date: Wednesday, May 17, 2023 7:06:01 AM

[EXTERNAL EMAIL]

Good morning Planning Commision,

My name is Justin Matney, and as a new property owner in the Sugarloaf Planning area, I have been following these proceedings for a little over a year now.

I would like to extend my respect and appreciation for your careful and thorough consideration for the dedicated duration, and trust that the product of your hard work here will result in the best future circumstances for the county and community.

The main point of this email is in specific regard to a single prohibited use, previously eliminated and brought back into question, being Spring Water Harvesting. I have a specialized lens for perspective on this topic and feel compelled to share my thoughts, in hopes that our efforts may help to ultimately protect our most sacred resources.

In my view, our freshwater supply is the single most valuable resource to life. Each and every life form we have ever known fundamentally depends on water at every moment. So extreme care must be given to our interactions, guidance, and awareness around this matter. Seemingly small decisions or simple definitions may have cascading downstream effects that may not easily be reverted.

I am forced to conclude that altogether eliminating the potential for property owners to engage with and utilize private spring water supplies will certainly be a violation of human rights. The right to access clean water is inalienable, and there is no honest basis for the prohibition of its usage.

I am concerned that this description would diminish our current or potential relationship with our local and private water supply. Putting it out of reach so far that any hopes for purposeful stewardship and aligned advocacy will evaporate. Protecting, enhancing and expanding the access, quality and capabilities of our water supply should be of the absolute highest priority. We must be careful not to sever critical connections to the truth of why we set out on this path for conservation to begin with, so that we can support the integrity of our natural resources and ensure the sustained opportunity for the engagement that all of us are so fortunate to experience.

In accordance with the mission of this plan, many historic spring houses still exist in the planning area, spring houses are a staple of the rural heritage. Ponds are technically spring water storage, creeks and streams are by definition conducting off site transportation and family business operations rely on the functional potential of Spring Water to provide products, experiences and services to our community. What about household or auxiliary drinking water systems, livestock or crop irrigation management, hydroelectric micro grids, or runoff and stream restoration efforts ? All of these could come into play as essential for future water security and may require some form of spring water harvesting or corollary. Why stop at Spring Water ? Which describes the source position in relation to the surface.. If Deer Park or equivalent wanted to install a bottling rig, could they just as simply extract ground water, from

just beneath the surface ?

I understand there is fear around the future of our water supply, but we must find solutions proportionate to the factual scope and scale of the desired outcome. Consider the possibility that displaced or disproportionate fear may make a proposed solution more likely to be an overdose. If the transport and sale of bottled water is, what we can agree, best to avoid having, then I would question that there are no such facilities proposing this type of invasive land use (to my knowledge). If there is evidence of misuse or commercialization, then that needs to be specifically addressed and managed independently of all other property owners. If large scale or industrial intrusion is an actual threat to the aquifer and/or groundwater supply then that needs to be made known and independently addressed. These types of commercial or industrial operations are already limited by requirement to utilize those parcels with corresponding commercial or industrial zoning of which very few exist in the planning area. I would also anticipate that if a particular parcel within the overlay was able to meet that zoning criteria, then that particular commercial or industrial business owner or its consultants would have to obtain proper permitting subject to site plan and governing body approval, where prohibitive decision making criteria implemented in that capacity would surely provide the sort of protection that was described against large scale bottling facilities engaged in sales and export.

One could argue that other real dangers surrounding this topic, namely industrial chemical and monocrop agricultural practices, are the most local threat to the safety of our planning area water supply. Therefore, those probably do need to be investigated as part of our protection methodology but, eliminating access to our spring water is not providing the proper corrective maneuver, rather it is actually further distancing us from the true water vulnerabilities we face here. To summarize, I am willing to stand to prevent the implementation of this language. I see this as the most insidious component of the entire plan.

This prohibitive terminology may seem inconspicuous and inconsequential to casual readers of this overlay document, but this would be a lasting detriment to the population here and total abuse of power. The opportunity for education and incentives lends itself to this topic. I urge the commission to please reconsider, and decide on what exactly this would accomplish, and more importantly how this threatens our innate relationship with the fundamental essence of human life in this area.

Spring Water Harvesting should not be a prohibited use for land owners, there exist other procedural frameworks that prevent the kinds of intrusions the commission is right to want to avoid. We need to respect that our access to fresh water is not something that can be justly prohibited. I am open to the opportunity for further discussion, and prepared to take action around defining appropriate methods to ensure that our water quality and security remains pristine and protected for now and for the future. With that in mind, I am asking you to please carefully consider that the original correction to remove this prohibitive language from the overlay description is indeed the right decision.

Thank you,

Justin Matney

(301) 980-5846

From: Anne T Sturm <annets1@aol.com>
Sent: Wednesday, May 17, 2023 4:31 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Sugarloaf Mountain Plan

I am writing to support the zoning proposal that would apply stricter agricultural and conservation rules to the 19,700 acres in Southern Frederick County including the mountain and rural properties along 270 on the western side of 270. Frederick County has had the long term plan of keeping development to the east of 270 and conservation areas on the West. By protecting this precious land, you are protecting a wider area of green space as it connects to the Montgomery Agricultural Reserve on the South side and the Monocacy Battlefield on the North.

As a member of Sugarloaf Regional Trails I strongly urge you to protect this precious historic and natural area. You will be proud of saving this treasured landscape and will enjoy taking your family and friends to hike or drive this restorative environment.

Thank you for your time and consideration.

Sincerely,
Anne Sturm
P.O. Box 341
Barnesville, MD. 20838

21730 Peach Tree RD
Dickerson, MD. 20842

From: [Courtney Arnett](#)
To: [Planning Commission](#)
Subject: Full zone overlaying - please support
Date: Wednesday, May 17, 2023 6:02:36 PM

[EXTERNAL EMAIL]

Dear Commissioners, Council members and County Executive Fitzwater

I feel in love with Sugarloaf Mountain as a young girl. I love the area so much that I decided to get married at Strong Mansion, situated just at the top of Sugarloaf. Please support the full “overlay zoning” covering the entire area encompassed by the Sugarloaf Mountain Treasured Landscape Management plan the County Council approved last December.

Sincerely,

Courtney Arnett

From: [Ronnie Susan Hay](#)
To: [Planning Commission](#); [Council Members](#)
Subject: Overlay zoning
Date: Monday, May 22, 2023 8:55:24 AM

[EXTERNAL EMAIL]

Please support the full overlay zoning covering the entire area encompassed by the Sugarloaf Mountain treasured landscape Management plan the County Council approved in December.

ZThis is critically important for the entire area, not just portions of Frederick County.

Richard Hill
Ronnie Susan Hay
Dickerson, Maryland

Specht, Jennifer

From: katielawhon@gmail.com
Sent: Wednesday, July 12, 2023 4:07 PM
To: Planning Commission
Subject: My comments on the Sugarloaf planning process

Categories: Green category

[EXTERNAL EMAIL]

Dear Frederick county planning commission:

Please consider this letter my feedback on the Sugarloaf plan. I am a Frederick county resident living at 242 Dill Avenue, Frederick.

Please recognize that the Sugarloaf Plan and Overlay District are preservation plans not development plans.

As I have stated before in letters to the planning commission and to the county commissioners, I strongly urge you to keep the Sugarloaf Plan and Overlay boundaries at I-270;

Let's keep the focus on our treasured landscapes in Frederick County. This means we need you to continue supporting forest, waterways and natural habitats protections and strengthening the Overlay's timber harvesting regulations.

Thank you for the opportunity to provide this public comment.

Sincerely,

Katie Lawhon
240/409-0728

From: Giuseppe Savona <jdsavona@aol.com>
Sent: Wednesday, July 12, 2023 8:25 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Overlay Language

Overall, I am very pleased with the amended language
I would like to add some comments to the cell tower for your consideration.

As background, The Federal Communications Commission interpreted the Pole Attachment Act of 1978 as requiring electric utilities to allow wireless carriers to attach their antennas on utility poles for reasonable compensation. And, from a state level, many states discourage the unnecessary proliferation of wireless tower facilities when it is possible to install antennas on electric transmission lines. By allowing carriers to mount antennas on existing transmission towers, utility regulators and the public avoid the construction of unnecessary new wireless facilities nearby. Accordingly, a utility shall provide a telecommunications carrier with nondiscriminatory access to any pole or right of way owned or controlled by it, including electrical transmission towers, unless there is basis where there is insufficient capacity and/or reasons for safety, reliability, and generally accepted engineering purposes. I believe the planning commission should incorporate some language to encourage carriers to strongly evaluate this option.

CELL-TOWER SAFETY

The Dangers of 5G Networks

Devra Davis, PhD, MPH
Environmental Health Trust

The new 5G cell-phone network promises to be the most powerful and fastest of all time. But with that extra speed comes extra risks.

Because of the shorter length of 5G's high-frequency waves and their inability to go through walls and trees, this new network will require building about 800,000 new wireless antenna structures, many of which will be located close to houses and schools in residential neighborhoods. To put that into perspective, there were about 300,000 antennas in 2015 and half as many in 2002.

The new antennas will be able to emit 3G, 4G and 5G microwave radiation at the same time. The World Health Organization classifies this kind of radiation as a possible carcinogen, and there's evidence that it can lead to some types of brain tumors both in animal studies by the US government and in humans that have used phones regularly for a decade or longer. Recently, Sprint stopped operating a cell tower in a California school yard after four students and three teachers there developed rare cancers in the 10 years since the tower was erected. With 5G, these risks may only worsen.



The US National Toxicology Program, considered the industry gold standard for this kind of testing, reported clear evidence of rare cancers and genetic damage in animals after prolonged exposure to 2G and 3G

radiation. 5G radiation is very similar, but it operates at a higher frequency and shorter range, making it potentially more dangerous.

Self-defense: The good news is that there already is a way to eliminate the damage. Hardwired fiber-optic cable can be run from a 5G tower to a home—as is regularly done in South Korea—and that means the tower can be far away from your home. Share your concerns with your local leaders, who should consider hardwiring at least the last mile with fiber-optic cable, as they did in St. Louis and Chattanooga.

Bottom Line Personal interviewed Devra Davis, PhD, MPH, president of Environmental Health Trust, a nonprofit scientific and policy think tank focusing on cell-phone radiation, Teton Village, Wyoming. She is a former senior adviser to the assistant secretary for health in the Department of Health and Human Services and a former member of the National Toxicology Program's Board of Scientific Counselors. She is author of *Disconnect: The Truth About Cell Phone Radiation*.



Photo of cell towers. Gettyimages/Mlenry

Specht, Jennifer

From: Giuseppe Savona <jdsavona@aol.com>
Sent: Wednesday, July 12, 2023 9:14 PM
To: Planning Commission
Subject: Sugarloaf Management Plan Amendments

Categories: Green category

[EXTERNAL EMAIL]

Thank you in advance for your work.

I concur with amendments but would like you to consider my comments regarding communication towers in RC and A districts.

As background, the Federal Communications Commission interpreted the Pole Attachment Act of 1978 as requiring electric utilities to allow wireless carriers to attach their antennas on utility poles for reasonable compensation. And, from a state level, many states discourage the unnecessary proliferation of wireless tower facilities when it is possible to install antennas on electric transmission lines. By allowing carriers to mount antennas on existing transmission towers, utility regulators and the public avoid the construction of unnecessary new wireless facilities nearby. Accordingly, utilities shall provide a telecommunications carrier with nondiscriminatory access to any pole or right of way owned or controlled by it, including electrical transmission towers, unless there is basis where there is insufficient capacity and/or reasons for safety, reliability, and generally accepted engineering purposes.

The clear objective is to locate cell towers away from schools, day care centers, and residential homes while utilizing existing infrastructure. As you know, many residential homes are located very near to RC/A regions in Frederick County.

Thank you
Giuseppe Savona

Sent from my iPhone

Specht, Jennifer

From: Betsy Franklin <Betsy.Franklin@84lumber.com>
Sent: Thursday, July 13, 2023 11:37 AM
To: Planning Commission
Cc: Elizabeth Franklin
Subject: SUGARLOAF OVERLAY MATTER

Categories: Green category

[EXTERNAL EMAIL]

TO THE COMMISSIONERS:

As a 23-year resident of Thurston Road, and ardent advocate for preservation of our beautiful and sensitive area, I want to express my support for the updated Overlay language, as conveyed in the Planning Office notice recently received by mail. Of course I will be in attendance at the 7/20/23 Hearing, and I understand I can voice my support again there.

I also want to take this opportunity to THANK YOU, COMMISSIONERS, for maintaining the Sugarloaf Plan and Overlay boundaries at I-270, and for supporting forest, waterway, and Natural habitat protections, and for strengthening timber harvest regulations in the Overlay area.

Sincerely,

Elizabeth (Betsy) Franklin
2669 Thurston Road
301/802-1223

Specht, Jennifer

From: Catherine Marcoux <katerihusky@gmail.com>
Sent: Monday, July 17, 2023 7:19 AM
To: Planning Commission
Categories: Green category

[EXTERNAL EMAIL]

Dear Planning Commisioners,

Thank you that you recognize the Sugarloaf Plan and Overlay District are preservation plans.

Please keep the Sugarloaf Plan and Overlay District boundaries at I -270, thus preserving forests, waterways, and natural habitat protections. Please strengthening the timber harvest Overlay regulations.

Please vote to enact the Sugarloaf Plan and Overlay District preservation years.

The over building of Frederick county must be balanced by the tax paying citizens that live in this county. I myself have lived here my entire 63 years. Right now Maryland is experiencing a drought and our population has increased and we need to preserve green spaces with mature trees to capture carbon from the environment.

In closing there is a Native American saying that goes like this: " We will be remembered by the tracks we leave behind."
Please enact the common sense preservation plans.

Thank you for listening.

Sincerely,

Specht, Jennifer

From: msimpson2005 bennettscreekfarm.com <msimpson2005@bennettscreekfarm.com>
Sent: Thursday, July 13, 2023 12:25 PM
To: Planning Commission
Subject: Sugarloaf Mountain Overlay

Categories: Green category

[EXTERNAL EMAIL]

Hello,

I will not be able to attend the meeting on July 20.

I wish to thank you all for supporting the Sugarloaf Mountain Plan as a Preservation plan, not a development plan. This is so important to the future of this special area of Frederick County.

Keeping the Plan and Overlay boundaries at I-270 will go far to protect the waterways and natural habitats of the surrounding areas of the Mountain.

Thank you for helping to preserve this area for our children and theirs.

Sincerely, Margy Simpson
2149 Thurston Road Frederick MD 21704
301-520-7113

From: Sherman Johnson <shermanajohnson@gmail.com>
Sent: Monday, July 17, 2023 11:43 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: The Sugarloaf Overlay

Planning Commission Members,

I am writing to urge you to approve the Sugarloaf Overlay.

I'd like to thank the Commissioners for:

- * Your recognition that the Sugarloaf Plan and Overlay District are preservation plans (not development plans).
- * Keeping the Sugarloaf Plan and Overlay boundaries at I-270.
- * Supporting forest, waterways and natural habitats protections and strengthening the Overlay's timber harvesting regulations.

The Sugarloaf Overlay has overwhelming public support. The small handful of vocal opponents have a clear vested interest in maintaining the status quo (likely for future development potential).

Whether they own 30 acres or 3,000 acres, those who mention personal/private property rights have very little to complain about. The differences between Ag and RC zoning are relatively minor. The Overlay is not a "taking" (via eminent domain) it is, for Ag properties, a relatively small zoning change to RC. In fact, § 1-19-7.740. "PROHIBITED USES", is not onerous at all. Additionally, the legislation says "New or expanded non-residential structures or buildings are **exempt** from the 15,000 square foot footprint limit, if the structure or building is used solely for: Agricultural Activity, as defined in 1-19-11.100." Finally, guaranteeing preservation may very well increase property values.

The bottom line is that:

- * The county has the absolute right to change zoning (up or down) for the greater good.
- * The impact on landowners in this case is small -- and in fact, many affected landowners support the Overlay.
- * Protecting Sugarloaf Mountain and the surrounding area is critical, particularly in light of the ongoing development pressures.

Please approve it, with absolutely no land within the boundaries exempted.

Sherman Johnson
Middletown

From: [Elizabeth Hill](#)
To: [Planning Commission](#); [Horn, Steve](#); [Hessong, Gary](#); [Specht, Jennifer](#); [McKay, Steve](#); [Carter, Mason](#); [Knapp, Renee](#); [Keegan-Ayer, MC](#); [Young, Brad](#); [Duckett, Kavonte](#); [Cherney, Ragen](#); [County Executive](#); [Kadish, Chelsea](#); [Donald, Jerry](#)
Subject: Comments on Sugarloaf Overlay
Date: Wednesday, July 19, 2023 11:07:15 AM
Attachments: [MFA Response to Gehman Letter.pdf](#)
[MFA Comments to Frederick Planning Commission.pdf](#)

[EXTERNAL EMAIL]

To the Members of the Frederick County Planning Commission,

Attached you will find 2 letters that our organization respectfully asks to have included as written testimony for the Planning Commissions July 20, 2023 meeting re: forestry provisions in the Sugarloaf Overlay Area.

The first is in response to a letter filed by Mr. John Gehman before the Planning Commission on March 31, 2023. We recognize that forest management is not well understood among the general public, which often leads to erroneous conclusions and assessments. MFA is a strong advocate for forestry practices that help, maintain, expand, and retain forests in Maryland. We hope this letter serves to give the Planning Commission a factually based understanding of forestry as the Sugarloaf Overlay is deliberated.

The second letter includes our general comments along with a suggestion that a task force be formed to establish goals and priorities for forest sustainability. The task force would then recommend policies to help meet the goals based on an assessment of forest conditions and an analysis of forest markets and employment opportunities.

Once again we'd like to extend an invitation for a boots-on-the-ground forestry tour for any Frederick County officials that might be interested. Although I won't be attending tomorrow's meeting, I'm happy to discuss these comments or address any questions you may have.

Best,
Beth

--

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

July 14, 2023

To the Frederick County Planning Commission:

This is in response to the letter filed by Mr. John Gehman before the Planning Commission on March 31, 2023. Since Mr. Gehman referenced Maryland Forests Association (MFA) several times in his letter, I feel it appropriate to respond as MFA's President as well as a professional forester licensed in Maryland.

Mr. Gehman seems to be advocating a major top-down local regulation of logging where some governmental entity decides what is best for the landowner and the forest, accompanied by strict enforcement of some set of future rules. We firmly reject such an approach. Our belief is that existing statewide regulations are already comprehensive and we should concentrate on better landowner education, technical assistance and incentives for proper forest management. That's what we in the forestry community do now, and quite honestly, it seems to be working pretty well.

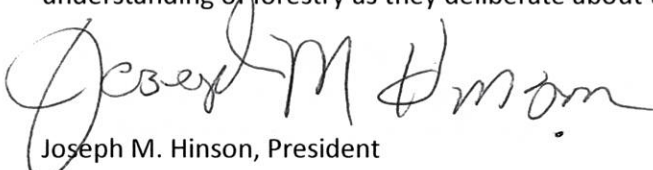
Turning to Mr. Gehman's concerns regarding a recent logging job on Stewart Hill Road, certain misconceptions and conclusions need to be corrected. His claim that "The bulk of the damage that this logger did is not visible from Stewart Hill Road" because the logger dragged "slash" to the back of the property is largely true. However, this was done at the request of the landowner and not an attempt to hide anything, as Mr. Gehman claims. In fact, loggers would not normally do this, simply because it's of no benefit and adds time and expense. And, contrary to his view, given how slash piles retain moisture, the fire hazard is low. Logging slash tends to break down quickly and, if it's piled, creates excellent habitat for songbirds and small animals—ask any rabbit hunter.

Mr. Gehman also contends that the logger "took practically every tree of any value, something that totally opened the forest canopy to direct sunlight and a major weed infestation. He ran a military-scale front-loader through practically every square foot of this 10-acre site. What he left was mostly dead trees and trees that demonstrate little if any commercial value." From a silvicultural perspective, this logging operation opened up the site to sunlight which promotes regeneration of yellow poplar and oak species. As it is a small area, trees adjacent to the site provide for a sufficient seed source for that regeneration. A recent site visit confirmed that the logged area is now well-stocked with young trees, principally yellow-poplar.

Statements in Mr. Gehman's letter that "This area of the forest will not recover", "a scalping of the forest", or "a weed-infested wasteland" are simply wrong. Unfortunately, Japanese stiltgrass and other invasives are a problem in the area and logging has little to do with it.

Concerns about forestry could perhaps best be aired with a field trip by qualified foresters, County Planning Commissioners and/or County Council Members, and anyone else with an interest to view this site and similar sites that were previously logged so that the effects of logging can be viewed firsthand on present and future forests. We note Mr. Gehman has suggested a similar field trip and we would be happy to make this happen.

We do appreciate Mr. Gehman's concerns and recognize that forest management is not well understood among the general public. This often leads to erroneous conclusions and assessments about forest operations such as those by Mr. Gehman. MFA is a strong advocate of forest practices that promote forest health and sustainability. We would like Commission members to have a factually based understanding of forestry as they deliberate about the Sugarloaf Overlay.

A handwritten signature in black ink, appearing to read "Joseph M. Hinson". The signature is fluid and cursive, with the first name "Joseph" written in a larger, more prominent script than the last name "Hinson".

Joseph M. Hinson, President
Maryland Forests Association
Maryland Licensed Forester #765



Maryland Forests Association, Inc.

P.O. Box 332

Linkwood, MD 21835

410-463-1755

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

July 14, 2023

To the Frederick County Planning Commission

RE: Amendment to Sugarloaf Treasured Landscape Management Plan

The Maryland Forests Association represents forest landowners and forest enterprises throughout the state. MFA is a strong advocate of sustainable forest management. Over the past decade we have supported and were proponents of several significant state laws that have, among other things, created new initiatives for tree planting and sustainable forestry. Our organization is fully dedicated to increasing, retaining, and maintaining forest cover across the state.

In this case, for the Sugarloaf Treasured Landscape Overlay, we must oppose the proposed forestry provisions as unnecessary and counterproductive. They are poorly crafted and are unnecessary given existing requirements. They will not bring about any meaningful change except to increase costs to landowners and disincentivize forest management. It is also our view that the Overlay's prohibition against sawmills that would apply to small farm sawmills is overly restrictive because farm sawmills, most often operated intermittently, are not out of character with the rural and economic landscape of the area.

Forestry is already well regulated in the county and across the state. Currently, each logging project requires a sediment and erosion control permit and a logging plan that are subject to review by the County and the Soil Conservations District. Forest management plans, such as those required in the proposed regulation, are best prepared well in advance of any harvesting plan and not merely to meet the requirements of obtaining a permit, as the current Sugarloaf proposal would mandate. Moreover, much of the additional information that would be required under the proposal adds nothing that would further protect environmental values on the ground. Most logging projects in Frederick County are small, probably rarely exceeding 10 acres. The cost of requiring a complex logging plan will render many projects impractical from an economic standpoint and encourage landowners to explore other alternatives for securing income from their land.

It is worth noting that the Sugarloaf Overlay would require detailed information not just for the area being harvested, but for the entire parcel. It would necessitate details on landowner objectives, timber stands and types, streams and waterbodies, wetlands, property boundaries, roads, soil types, consultations with DNR on areas with sensitive species and management guidelines, identification of invasive species and a description of each stand, proposed management, future conditions. MFA encourages all landowners to develop such a plan prepared by a licensed forester. But that should not be

required as part of a harvesting permit application. Moreover, the proposed regulations are silent on the matter of what the regulating officials will do with all of the additional information. To put the Sugarloaf district into perspective, on average, no more than one logging permit application is filed annually. Frankly, there is no measurable benefit to prescribing the proposed forestry regulations as part of the Overlay.

The Better Idea

MFA proposes a better idea. We propose that the Frederick County Executive form a task group comprised of knowledgeable county, state, and federal employees to review, assess, and make recommendations about forests in Frederick County (not just Sugarloaf!). That task group should be charged with: (1) assessing forest conditions in Frederick County; (2) analyzing market and employment opportunities in the forest sector; (3) establishing goals and priorities for forest sustainability; and (4) recommending county policies to meet those goals.

MFA certainly stands ready to offer its assistance. A more considered, analytical, and practical review of forest policy in the County would serve its citizens better than what is being proposed in the forestry provisions of the Sugarloaf Overlay.

A handwritten signature in black ink, appearing to read "Joseph M. Hinson". The signature is fluid and cursive, with the first name "Joseph" being more prominent and the last name "Hinson" following in a similar style.

Joseph M. Hinson, President
Maryland Forests Association
Maryland Licensed Forester #765

From: [John Hooven](#)
To: [Planning Commission](#)
Cc: [Horn, Steve](#); [Hessong, Gary](#); [Specht, Jennifer](#); [McKay, Steve](#); [Carter, Mason](#); [Knapp, Renee](#); [Keegan-Ayer, MC](#); [Young, Brad](#); [Duckett, Kavonte](#); [Cherney, Ragen](#); [County Executive](#); [Kadish, Chelsea](#); [Donald, Jerry](#)
Subject: Sugarloaf Overlay Comments
Date: Wednesday, July 19, 2023 3:11:01 PM
Attachments: [doc12413120230719155905.pdf](#)

[EXTERNAL EMAIL]

Members of the Frederick County Planning Commission,

Attached is a letter that we respectfully ask to be included as comments for the Planning Commission's July 20, 2023 meeting referencing the forestry provisions in the Sugarloaf Overlay Area. As program coordinator of the MD/DE Master Logger Program, I am forwarding this letter on behalf and at the request of the program's committee.

The public at large can be confused by the science and practice of forestry. Forestry can be a complicated topic. It is important, from our perspective, to ensure that policy will not inhibit, curtail or complicate the proactive forest management that has given the area its attractive characteristics.

As forest stewardship educator, I am available to enlighten those in the dark about the science of forestry. My contact information is below should there be any questions or if I can be of any further assistance.

Thank you for your time.

--

John Hooven
Forest Stewardship Educator
and MD/DE Master Logger Program Coordinator
(410) 827-8056 Ext. 125
(410) 310-8445 Cell



Wye Research and Education Center
124 Wye Narrows Drive
Queenstown, Maryland 21658-0169
TEL 410-446-4267

July 19, 2023

Frederick County Planning Commission
30 N. Market St.
Frederick, MD 21701

RE: Comments on proposed forest management provisions in the Sugarloaf Overlay

Members of the Frederick County Planning Commission,

The Sugarloaf Area did not become a “treasured area” without proactive forest management. It is critical that proposed policies do not inhibit the science of sustainable forest management. There are elements of the Sugarloaf Treasured Landscape Management Plan (STLMP) that are redundant to existing policies on forestry. Forest management activities should not have further impediments that would discourage such activities through overregulation. Forest ecosystems are living, dynamic ecological interactions. Foresters and the forest products industry have been effectively and sustainably managing these types of environments for the many uses of societies for hundreds of years. Foresters should have the resources available to practice sustainable silviculture that promotes healthy and productive forests while also meeting the needs of the community.


Our natural environments are asked to provide ever increasing demands to our society. New and alien stressors are constantly being added to these environments. Society’s expectations are that the natural environments are always as they expect when the reality is to the contrary. A healthy and productive forest does not spontaneously exist. Humans exist as individuals for only a fraction of the time that a forest area exists. It is only through multiple generations of our existence that we can appreciate the needs and changes of these dynamic environments. Public policy should reflect the fluidic dynamics of the natural ecosystems and have consideration for not only its present needs, but those of the future, and with consideration of past successful management practices. Planning, therefore, should not be rigid but allow for options. Forest stewardship is not static but should be proactive in its planning and implementation.

The STLMP seeks to protect a valuable landscape important to Frederick County and the vicinity. Such protections should not be overreaching to interfere with the achievements of past successful management activities. These protections should not be a burden to the taxpayers. Proactive forest management has been practiced sustainably and typically without the stress of a financial burden to the woodland owner, as has been the case in the decades long example of the management of Sugarloaf Mountain by Stronghold, Inc.. Considerations for forest management activities, as expressly provided by the Livable Frederick county master plan, should follow the course of “...cost-effective manner through viable forest products markets and good forest management.” Removing the means of having a market and providing material for that market contradict the goals of the county master plan. Agricultural/woodland owners need to continue to have a means to sustainably use the natural resources on their lands, that provide an incentive for them to do so, while also stewarding this environment that residents have grown to love.

Sincerely,

pp:

MD-DE Master Logger Program
Steering Committee

 Todd Borman, MD Forester 423