



August 12, 2025

**VIA ELECTRONIC MAIL**

Kimberly Gaines  
Livable Frederick Director  
Frederick County Government  
Division of Planning and Permitting  
30 North Market Street  
Frederick, MD 21701

Re: Investing in Workers and Workplaces (IW2) Plan  
5209 Green Valley Road, New Market, Maryland 21770

Dear Kim:

This firm represents Twenty Eight LLC, the owner of 28.28 ± acres of land identified as Parcel 100 on Frederick County Tax Map 88C and located at the intersection of Baldwin Road and Green Valley Road (MD 75) (the “Property”). The Property lies within one of the economic development areas currently being considered for comprehensive planning and zoning changes as part of the IW2 Plan. The purpose of this letter is to officially request that: 1) the Property retain its current zoning classification of General Commercial (“GC”) and 2) that the Property be assigned a Mixed Use (“MX”) land use designation on the Frederick County Comprehensive Plan.

As you know, this Property has been discussed several times during recent Planning Commission workshops due to its proximity to both the Route 75/I70 interchange and properties to the south that are recommended for reclassification to the Limited Industrial (LI) Zoning District. Since no representative of Twenty Eight LLC was present at these prior meetings, Twenty Eight LLC now wishes to clarify, for the record, that it does not want any portion of the Property rezoned to LI. Rather, Twenty Eight LLC wants to retain the existing GC Zoning on this Property in order to provide the types of service and retail opportunities that Commissioner Seppe noted during a prior workshop as being important in and around this interchange.

Twenty Eight LLC also sees this Property as a potentially ideal location to satisfy the other side of the IW2 equation – workforce housing. The IW2 mission statement acknowledges that housing availability is a “critical factor” that “influences the economic success in a community.” Twenty Eight LLC is requesting that the Property be assigned the MX land use designation, so that it can explore the feasibility of developing the Property as a mixed-use development with a multifamily residential component through a future application for reclassification to the MXD floating zone. Frederick County has an immediate and pressing need for workforce housing and this Property, being located within in a future economic development hub with direct access to a robust state and local transportation network as well as the Town of New Market offers a unique opportunity that Twenty Eight LLC may wish to pursue in the future.



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On behalf of Twenty Eight LLC, we thank you in advance for your consideration of this request. Should you or any of your staff have any questions regarding this request, please feel free to contact us.

Very truly yours,

A handwritten signature in blue ink that reads 'Lisa Lawler Graditor'.

Lisa Lawler Graditor

cc: John Dimitriou  
Denis Superczynski  
Randy Cohen  
Alyse Cohen  
Mary Patton