

December 2, 2021

To: Frederick County Planning Commission
Cc: Frederick County Council
County Executive Gardner
From: Steve Poteat, Member, Sugarloaf Treasured Landscape Management Plan
Advisory Group
Subject: **Sugarloaf Plan - Stick with Livable Frederick Priorities**

The letter of November 9, 2021 from Natelli attorney Bruce Dean of November 9, 2021, included in the Sugarloaf Treasured Landscape Management Plan workshop file, unfortunately fails to “tell the truth, the whole truth and nothing but the truth” regarding the priority for further development of the Urbana area. Mr. Dean chooses to disregard the facts and advocate only for his client’s development interests. In fact, the Livable Frederick Master Plan clearly prioritizes other county areas as Primary Growth Sectors. Urbana and the I-270 Corridor are the Plan’s and the County’s LOWEST priority areas.

At this time, it is unjustified and premature to consider cutting out properties from the Sugarloaf Plan for future development. At this time the most responsible action is to leave the proposed cutout within the Sugarloaf Plan boundary with the existing conservation/agricultural zoning to protect it from piecemeal development.

Further, to more comprehensively consider the uncertain future of the I-270 corridor and the Urbana region, the boundary of the Sugarloaf Plan must be extended from the Montgomery County line to the Monocacy River with I-270 as its eastern border. In fairness, this excludes the three existing pre-Livable Frederick commercial properties at the I-270/MD 80 interchange.

In fact, the Livable Frederick Master Plan prioritizes the areas in the County for growth on pages 39-45, NOT just page 45, as Mr. Dean suggests in his letter. Urbana is at the end of the line.

“The Primary Growth Sector is composed of land in and around Frederick City, including the Frederick City Growth Area, the Ballenger Creek Community Growth Area, the South Frederick Community Growth Area, and lands along major infrastructure corridors in the southern portion of the county that connect to regional employment centers. These include the Eastalco Growth Area, the Brunswick Community Growth Area, the Point-of-Rocks Community Growth Area, and [finally!] the Urbana Community Growth Area, and the I-270 Growth Area.”(pg. 39)

The Livable Frederick Master Plan emphasizes “... major developed areas in the county that have significant access to infrastructure and services-areas where there is a high potential for development patterns that support multi-modal accessibility, and where a significant share of development may occur through infill and redevelopment strategies.” (pg. 39)

After the Central Districts of the City of Frederick, the South Frederick Triangle, and Ballenger Creek are listed for priority development, the existing multi-modal rail corridor areas come next

including the Eastalco Growth Area, the Monocacy MARC Station, the Downtown Frederick Center, South Ballenger Creek, Brunswick, and Point of Rocks.

In fact, the area without transit and infrastructure logically comes last: the I-270 Corridor, including the Urbana Community Growth Area. Development in the I-270 Corridor is based on the availability of rapid transit plus other intensive infrastructure. Any reasonable estimate of the availability of rapid transit, as envisioned in the Livable Frederick Master Plan, is decades or longer away. A few commuter buses on congested I-270 and MD 355 to the Urbana Park and Ride lots do not constitute “a practical and affordable transit line.”

Transit is far in the future. In fact, the ongoing Montgomery County general plan update, “Strive 2050,” clearly suggests the developed area in Montgomery County ends at Clarksburg and is hardly transit serviceable. Montgomery County’s agricultural preservation area and large lot residential development borders Clarksburg and extends to the Frederick County line. An objective reading of both the “Strive 2050” draft General Plan and the draft “Corridor Forward 2040” transit plan (both alluded to in the Sugarloaf Plan) suggests that Montgomery County is not supportive of a continuation of the so-called I-270 Technology Corridor beyond Clarksburg.

The Montgomery County “Corridor Forward-2040” draft transit plan suggests that the expansion of the MARC commuter rail to Frederick is much more likely than either a monorail or a Bus Rapid Transit (BRT) in the I-270 Corridor. These are important considerations since any expansion of transit to Frederick from the Washington area must pass through Montgomery County.

The Governor’s Managed Lanes Study from I-495 to Frederick, including HOT lanes and BRT, is currently underway. But with lukewarm support in the region and outright opposition from the Montgomery County Executive, and only a year left in the current Governor’s term, it is fair to say that the future of that study is questionable.

No multimodal transit development at the existing Urbana interchange or at possible future Parks Mill or Mott Road interchanges should be considered based on a study, like the Governor’s Managed Lanes Study, the continuation and outcomes of which are so tenuous. At the very least, any approval of multimodal-based development in Urbana should only take place once construction of a dedicated lane BRT to Frederick is approved and funded. The BRT, like other I-270 Corridor improvement promises, may also be tenuous.

Frederick County must prioritize planning and development as the Livable Frederick Plan outlines. The County cannot support development in all the potential Primary Growth Sectors at once. Development in and around Frederick and along the existing rail and infrastructure corridors must receive priority. The Urbana area has low priority, despite developer pressures.

To repeat, at this time the most responsible action is to stick with the Livable Frederick priorities, prevent piecemeal development in the Urbana area west of I-270 and preserve the proposed cutout properties within the Sugarloaf Plan boundary.

Goodfellow, Tim

From: Planning Commission
Sent: Friday, December 3, 2021 1:30 PM
To: Nick Carrera
Cc: Brandt, Kimberly G.; Goodfellow, Tim
Subject: RE: A spectre is haunting Frederick County

Good afternoon:

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

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

Karen L. James
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From: Nick Carrera <mjcarrera@comcast.net>
Sent: Wednesday, December 1, 2021 4:39 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Cc: Carrera, Nicholas <mjcarrera@comcast.net>; County Executive <CountyExecutive@FrederickCountyMD.gov>;
Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: A spectre is haunting Frederick County

[EXTERNAL EMAIL]

A spectre is haunting Frederick County. No, not Jacob Marley's ghost, whose chain of cash-boxes clanked so loudly. This spectre is Silence and Secrecy. The county holds virtual meetings with low participation, but plans are afoot that deserve close scrutiny. Some might not survive it, so proponents are happy to limit exposure, with Covid as a convenient excuse. This must not happen. These issues deserve especially close scrutiny:

The Sugarloaf Treasured Landscape Management Plan. The Sugarloaf Plan was over a year in preparation. It was set for release in March 2021, but release was delayed at the last minute by county officials. It was then rewritten out of public view and released in July. It excluded hundreds of acres near Urbana, freeing them from Plan restrictions on use. Developer Thomas Natelli owns most of the excluded area. When this secret sleight came to light, the Planning Commission restored that property, at least for now, to coverage by the Plan. It will consider the Plan without prejudice to the final status of the properties. Mr. Natelli and his spokesmen continue to press for exclusion from Plan restrictions on his property.

Amazon Data Centers? On August 16, 2021, county officials held a closed-door meeting with ten officials from Amazon. Nine are with Amazon's Web Services branch, so discussion likely dealt with data centers, not product centers. No details have emerged, despite citizen requests. (County officials say they are bound by a "non-disclosure agreement," but seem to allow themselves flexibility in what other county information is deemed "open.") Also at the meeting were Eric Soter, with the firm that replatted Natelli's agricultural

properties for some new use; and Bruce Dean, a lawyer specializing in land-use and development. Both Soter and Dean are pushing to free Natelli properties from the Sugarloaf Plan. This suggests a link between the Amazon discussion and the Natelli properties.

The Planning Commission has been conducting virtual meetings in discussing the Sugarloaf Plan. This issue is so important that public participation should not be virtual. At their next meeting, December 8, the Commission should decide it will hold "live" discussion or will postpone discussion altogether. "Live" discussion is possible; others have done it. Several county officials, including the County Executive, attended a live meeting at the Urbana fire house on September 29, when irregularities in the Sugarloaf Plan's preparation were discussed. Surely the Planning Commission can meet "live" for discussion of the Sugarloaf Plan.