



Written comments from Montgomery Countryside Alliance

on Thrive 2050 – June 2020 working draft

**Regarding the role of the Agricultural Reserve in Montgomery County's
General Plan Update.**

August 5, 2020

Executive Summary

We appreciate the numerous meetings that planning staff have held with Agricultural Reserve advocates and producers. And we salute staff's efforts to appropriately elevate the role of the Ag Reserve in the Thrive 2050 documents, and by extension in Montgomery County's future. The positive profile of the Ag Reserve in Thrive 2050, for its continued provision of food, fiber, forests, clean air and water and open space, has increased over the past year. **The fact of rising food insecurity including here in Montgomery County, will elevate even more the Ag Reserve's role in supplying food to our region.**

Existing General Plan's Geographic Framing is Crucial. It's Largely Missing from Thrive 2050.

The existing General Plan's Wedges and Corridors geographic framing is fundamental to our ability to guide wise planning in Montgomery County, including for the prosperity of the Agricultural Reserve. We are concerned that the Thrive 2050 documents to date do not adequately describe, nor use as a basis, this geographic framing. The proposed "web and corridor" approach contradicts Wedges and Corridors, and creates a platform for urban sprawl. We urge that the concept of "web and corridor" be dropped, and that Wedges and Corridors be elevated for Thrive 2050, including its four geographic components, and used as the fundamental basis for the application of the priority Outcomes and overarching Themes.

Core Role of the Agricultural Reserve Must Be Highlighted Even More.

While it's important that the role of the Agricultural Reserve has been addressed as a Goal within Theme 7, Diverse and Adaptable Growth, we also see a crucial need for this document to highlight the Ag Reserve's role even further, for its original core purpose, as a balance for and complement to the urbanism that is a heavy focus of the current working draft. Similarly we see the need to elevate the role of the Park System in public health, active nature-based recreation like bird watching, hiking and picnicking, and in climate resilience.

Procedural Comments

- Separately from the good efforts of staff to incorporate our input, we continue to have serious concerns over a flawed process at the Planning Board, where an unnecessarily-

Comments of Montgomery Countryside Alliance on Thrive 2050 Working Draft of June 2020 – submitted August 5, 2020

adversarial atmosphere has marginalized communities that otherwise would be full partners in the Thrive 2050 process.

- We will continue to contribute input to Thrive 2050, in a good-faith effort to participate in a county planning process whose hallmarks traditionally have been collegiality, and a respectful partnership of equals.

Contributors to these comments: Caroline Taylor, Lauren Greenberger, and Diane Cameron, with input from Lee Langstaff and Jim Brown.

***** End of Executive Summary *****

Substantive Comments on Specific Sections:

Here we provide detailed comments on the following Themes: Procedural Comments; Big-Picture Comment on Part 1 and the entire Thrive 2050 effort; 7. Diverse and Adaptable Growth (with comments centered on Goal 7.4 on the Agricultural Reserve); 4. Safe and Efficient Travel; 6. Healthy and Sustainable Environment.

Along the way we will share comments on the need for a holistic approach to land use planning in Montgomery County, that remains grounded in the geography and essential wisdom of our longstanding General Plan, embodying smart growth and the inter-dependency of urbanist and agrarian communities. This holistic approach highlights our agrarian heritage as the foundation for our future evolution.

Procedural Comments: Fostering Full Public Participation is Necessary to the Success of Thrive 2050.

- Separately from the good efforts of staff to incorporate our input, we continue to have serious concerns over the unnecessarily-adversarial process at the Planning Board, not only on Thrive 2050 but also on master plan and site plan issues. This flawed process has chilled full public participation on the part of key affected stakeholders, including communities in the Agricultural Reserve. This atmosphere has narrowed the scope of communities that otherwise would be partners in the Thrive 2050 process.
- The process flaws include the fast-tracked schedule for Thrive 2050 during a pandemic, compounded by the lack of broadband service in the Ag Reserve.
- Effective public participation requires that residents and community groups come into the process knowing that their role will be respected and their input valued.
- We will continue to communicate with planning staff and to seek to testify at Planning Commission hearings, including on Thrive 2050, in a good-faith effort to participate in a county planning process whose hallmarks traditionally have been collegiality, and a respectful partnership of equals between Planning Commissioners and staff, and community and neighborhood group leaders and civic activists.

Big-Picture Comment: The General Plan’s Wedges and Corridors Framing and Basis Must Be Elevated and used as the basis for all of the Thrive 2050 documents; “web and corridor” must be dropped.

The existing General Plan’s Wedges and Corridors geographic framing is fundamental to our ability to guide wise planning in Montgomery County, including for the prosperity of the Agricultural Reserve. While there are several positive mentions of Wedges and Corridors being a successful basis for our existing General Plan, we are concerned that the Thrive 2050 documents to date do not adequately use Wedges and Corridors as the basis for grounding the priority Outcomes and eight Themes in the geographic logic of land use and density. The proposed “web and corridor” approach contradicts Wedges and Corridors, and creates a platform for urban sprawl. We urge that the concept of “web and corridor” be dropped, and that Wedges and Corridors including its four

geographic components be elevated in Thrive 2050, and used as the fundamental basis for the application of the priority Outcomes and overarching Themes.

Part 1 of the Thrive 2050 document contains several references to the existing General Plan’s Wedges and Corridors framing and basis. Among these references is this statement on page 5:

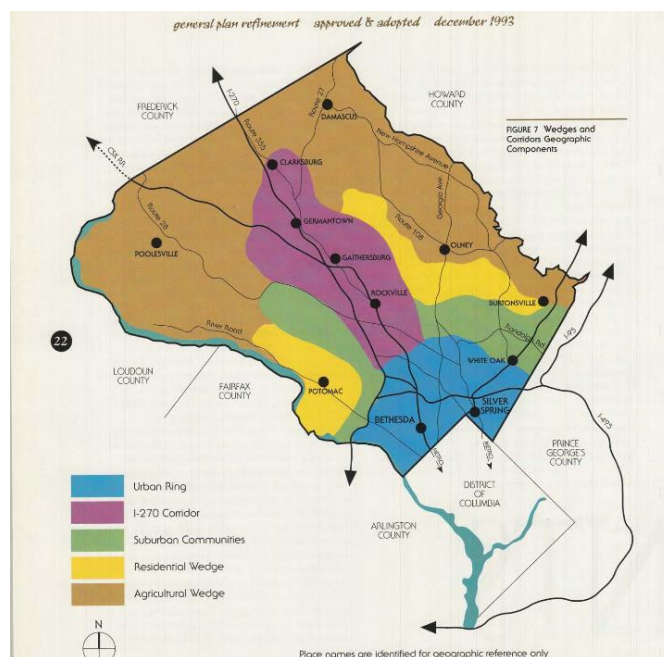
“The General Plan Update, Thrive Montgomery 2050, builds upon the foundation set by the 1964 General Plan and all subsequent plans and policies. It will modernize the original plan’s Wedges and Corridors concept (self-contained corridor cities connected by a transportation network) and refine it for the next 30 years to ensure its relevance for tomorrow’s challenges.”

(Thrive 2050, June 2020, Draft Vision, Goals, Policies and Actions Document, page 5.)

Without more explanation of what is meant by the “modernization of Wedges and Corridors,” we don’t know exactly what this entails. But in some places in this Thrive document, it appears that the intent is to replace Wedges and Corridors with “Webs and Corridors;” we see this as damaging to all three of the priority Outcomes (Equity, Economic Health and Environmental Resilience). So, we ask that “webs and corridors” be dropped and that Wedges and Corridors be fully utilized as Thrive’s framing and geographic basis.

Further discussion on why we need to base Thrive on Wedges and Corridors.

As Ag Reserve advocates have noted in meetings with Planning Director Wright and other planning staff over the past year, the existing General Plan’s geographic framing is fundamental to our ability to guide wise planning, land use, and public investments in Montgomery County. By “geographic framing,” we refer to the existing General Plan’s basis and grounding in the physical landforms and the locations of urban, suburban, and rural places and regions. As noted in the [General Plan Refinement of 1993](#), **“The Refinement loosely describes the character and location of four geographic components and a regional transportation network.”** (page 5). The four geographic components as described in the General Plan Refinement of 1993 are: the Urban Ring; the I-270 Corridor; Suburban Communities, and “the Wedge” which includes the Agricultural Reserve, and the Residential Wedge. The map below is from page 22 of the General Plan Refinement of Goals and Objectives for Montgomery County (1993).



A few places in the Thrive 2050, June 2020 working draft acknowledge the success of our Wedges and Corridors basis:

Issues and Challenges

The [1964 General Plan](#) laid out the broad planning principles based on the “Wedges and Corridors” concept. These principles generally worked, and the county grew in an orderly fashion into an economic engine for the state and a desirable home to more than a million people. However, the county’s current land use and development patterns need to be reimagined to deal with the current and emerging issues of technological innovation, traffic congestion, economic and equity issues, and the threats of climate change.

We also see text that indicates intent to retain this basis:

This vision of how we should grow over the next 30 years respects the original “Wedges and Corridors” plan, with a greater emphasis on a compact form of development and the role of corridors as places to grow. It continues to protect and honor the Agricultural Reserve—a nationally recognized planning landmark that provides economic and environmental benefits. It also involves making a series of adjustments and refinements in the way we live, work, relate and play. It will require changes in our laws and regulations that shape our built environment. We will need to make tradeoffs that may not be easy. Realizing our vision will require a sustained commitment over the next decades from residents, community groups, businesses, developers, nonprofits and government. Inaction is not an option. If we’re successful, we’ll have an equitable community in an economically healthy and environmentally resilient county.

Although it’s indeed important to see these positive mentions of Wedges and Corridors and the intent of Thrive 2050 to retain this basis, MCA and our partners are deeply concerned that the Thrive 2050 documents to date do not adequately base the Thrive 2050 General Plan update on Wedges and Corridors. In addition to this need to elevate the role of Wedges and Corridors, there is the need to avoid contradicting it – to avoid establishing a new system that fundamentally conflicts with Wedges and Corridors (especially with Wedges). The Thrive documents depict a land use pattern termed a “*web of complete communities connected by vibrant corridors.*” A “web” is different than a system of wedges, and it can be construed to promote the urbanization of now-rural and low-density areas – our Green Wedge.

What is the long-term vision for Montgomery County?



In 2050, Montgomery County is a web of complete communities connected by vibrant corridors.

Complete communities: Individual and unique centers of neighborhood activity and urban nodes optimize land use with a variety of housing types and price points are located close to transit, workplaces, needed goods and services, public amenities and active park spaces.

Vibrant corridors: comfortable, safe corridors of multimodal transportation and services; and corridors of green parks, stream valleys and trails.

Although not perfect, our existing geographic framing and basis has worked well in protecting rural farms and forests – and the clean streams and groundwater that they in turn protect -- while focusing urban and suburban growth along the corridors and in the existing cities. The Wedges and Corridors framing and basis has worked well and while it can be tweaked, we see no need to “fix what isn’t broken.” The Thrive documents themselves affirm the intention to retain the elements of our General Plan that are working and serving us well.

MCA and partners request that the existing geographic framing and basis of our General Plan (as of the 1993 Refinements) – our Wedges and Corridors -- be retained and featured prominently in Thrive 2050, and used as an organizing basis for the entire set of Thrive 2050 documents. This geographic framing and basis is in full harmony with, and supportive of, the three Thrive 2050 priorities of Equity, Economic Health and Environmental Resilience; and the eight overarching themes of Complete Communities; Connectedness; Diverse Economy; Safe and Reliable Travel; Affordability and Attainability; Healthy and Sustainable Environment; Diverse and Adaptable Growth; and Design, Arts and Culture.

Comments of the Montgomery Countryside Alliance

on Thrive 2050: Theme 7. Diverse and Adaptable Growth

Theme 7 of Thrive 2050, “Diverse and Adaptable Growth,” contains Goal 7.4 which is centered on the Ag Reserve:

“Goal 7.4: Strengthen Montgomery County’s agricultural character to ensure the prosperity of the Agricultural Reserve into the future. Balance advancements in industry practices to enhance the Agricultural Reserve. Sustain farmland, rural open space and rural environmental resources to support the well-being of the entire county.”

Overall, we strongly support the wording of this Goal 7.4 centered on the Ag Reserve, except for the second sentence, which we request be omitted; it’s vague and could be interpreted or misinterpreted to mean “bring various industries into the Ag Reserve to balance with agriculture.” As now worded it can be interpreted to give support to non-agricultural land uses in the Ag Reserve.

The remaining two sentences are strong and clear in their affirmation for sustaining the Ag Reserve for farming, rural open space and rural natural resource preservation and respectful uses in keeping with these rural landscapes. So, we ask that the problematic second sentence be deleted.

MCA Comments on specific policies and actions under Goal 7.4:

Overall comments: There are eight proposed Policies under this Goal:

Policy 7.4.1: Eliminate barriers and broaden access to healthy food, agritourism and agricultural employment through the support and diversification of the agricultural sector including urban and suburban farming. Identify opportunities for adaptive reuse of underutilized urban and suburban land for farming.

Policy 7.4.2: Maintain and enhance the Agricultural Reserve as a national model for supporting and protecting agriculture and rural open space that provides vital economic, environmental and health benefits in a major metropolitan area. Study, promote and monitor the economic, environmental and health benefits of the Agricultural Reserve.

Policy 7.4.3: Support and enhance policies that provide opportunities for new farmers who want to own and operate their own farms in the county.

Policy 7.4.4: Increase public awareness of the agricultural, environmental and economic benefits of the Agricultural Reserve and better connect communities throughout the county to this vital resource through public education and outreach, school programs, and fostering agritourism and ecotourism.

Policy 7.4.5: Provide residential communities in the Agricultural Reserve with adequate infrastructure and services in a way that preserves the agricultural heritage and the unique character of this resource and supports the needs of evolving agricultural practices.

Policy 7.4.6: Maintain agriculture as the primary land use in the Agricultural Reserve through policies, regulations, easements and incentives. Promote farming, support farmland and open space conservation, protect environmentally sensitive areas, respond to climate change and ensure that rural complete communities are compatible with the intent of the Reserve.

Policy 7.4.7: Balance support for an evolving agricultural industry with the conservation of farmland, rural open space and environmental resources in the Agricultural Reserve.

Policy 7.4.8: Establish food production and distribution infrastructure to enable county growers to process their products locally and to reach residents through culinary, grocery and wholesale outlets. This system will increase the competitiveness of farmers and reduce reliance on imported agricultural products and associated carbon emissions.

MCA's Comments on this proposed set of Policies regarding the Ag Reserve:

Overall comments on this proposed set of Policies:

- **MCA supports the thrust of Goal 7.4 which is to “*Strengthen Montgomery County’s agricultural character to ensure the prosperity of the Agricultural Reserve into the future.*”**
- **Each proposed Policy must be fully in support of the goal – strengthening our County’s agricultural character and ensuring the prosperity of the Agricultural Reserve into the future. Proposed policies, or clauses within them, that do not fully support this goal, but instead are in conflict with it, must be omitted.**
- **The ordering of the set of eight Policies must reflect and support Goal 7.4.**

MCA supports the thrust of Goal 7.4 which is to “*Strengthen Montgomery County’s agricultural character to ensure the prosperity of the Agricultural Reserve into the future.*” To the extent that each Policy fully supports this Goal, we support the policy. Conversely, to the extent that we see a conflict between a proposed Policy under this Goal, and the Goal itself, we request that that Policy be omitted entirely, or recast to fully support this goal.

We also suggest a slight re-ordering of the set of Policies under Goal 7.4, that we see as more-conducive to public understanding and support of this Goal and its Policies and Actions, and to the ultimate success of this Goal, Policies and Actions as they are implemented by Planners, Planning Commissioners, Councilmembers and County staff, Ag Reserve landowners, residents, farmers, and customers. We ask that proposed Policy 7.4.2, “Maintain and enhance the Agricultural Reserve as a national model for supporting and protecting agriculture and rural open space...” be made the new Policy 7.4.1. This is the first-and-foremost Policy guiding this entire Goal; so we ask that it be the first Policy in the set.

Below we provide Policy-by-Policy Comments for each of the eight proposed policies under Goal 7.4.:

Policy 7.4.1: Eliminate barriers and broaden access to healthy food, agritourism and agricultural employment through the support and diversification of the agricultural sector including urban and suburban farming. Identify opportunities for adaptive reuse of underutilized urban and suburban land for farming.

Comment: MCA supports this Policy, since we are active supporters of urban and suburban agriculture in Montgomery County and we believe that a rural-urban agricultural partnership holds promise for providing greater food security, public health, and a raft of other benefits.

Policy 7.4.2: Maintain and enhance the Agricultural Reserve as a national model for supporting and protecting agriculture and rural open space that provides vital economic, environmental and health benefits in a major metropolitan area. Study, promote and monitor the economic, environmental and health benefits of the Agricultural Reserve.

Comment: MCA supports this Policy, and requests that it be made the first Policy in this section. The basis for this entire set of Policies, under Goal 7.4, must be grounded in the Agricultural Reserve itself as the locus of rural agricultural production, including regenerative farming, forest protection, reforestation, tree and native plant nurseries, and other burgeoning agricultural and silvicultural sectors.

By centering this Policy as first-and-foremost in the set of eight, we are underscoring the central role of the Ag Reserve, enabling it to continue to provide food and water security to

the region. By centering the Ag Reserve, we spotlight its central role in the startup of new ventures in providing expertise, person-power, institutional partnerships, and materiel support for urban and suburban agriculture initiatives.

Policy 7.4.3: Support and enhance policies that provide opportunities for new farmers who want to own and operate their own farms in the county.

Comment: MCA strongly supports this policy. We offer to work more-closely with Planning staff to share our expertise in this field, since we have been helping and supporting new farmers, including immigrants and young farm families, for many years through Land Link and other programs.

Comment on Proposed Action 7.4.3.a.: Under this proposed Action, a clause at the end references the biosciences industry. In many agricultural regions of the county, including the Midwest, the biosciences industry has been problematic for farmers and the environment. One example of a bioscience problem: [Cancer incidence related to the weedkiller Roundup](#), has occurred among agricultural workers and gardeners exposed to this herbicide. Unless the term “biosciences industry” is defined in a narrow way here, to restrict it to ecologically-beneficial endeavors that aren’t related to seed patenting, pesticides, and other damaging outcomes, we request removal of this clause.

Policy 7.4.4: Increase public awareness of the agricultural, environmental and economic benefits of the Agricultural Reserve and better connect communities throughout the county to this vital resource through public education and outreach, school programs, and fostering agritourism and ecotourism.

Comment: MCA strongly supports this policy. We offer to work more-closely with Planning staff to share our expertise in this field, since we have been partners with the Poolesville High School Global Ecology program program, and presenters on Montgomery County agriculture to many other school and civic groups. Since its inception, MCA has constantly worked to educate the public and decisionmakers about the Agricultural Reserve, and to provide welcoming opportunities for people throughout the DMV to visit the Ag Reserve, tour farms, and purchase its products.

Policy 7.4.5: Provide residential communities in the Agricultural Reserve with adequate infrastructure and services in a way that preserves the agricultural heritage and the unique character of this resource and supports the needs of evolving agricultural practices.

Comment: MCA supports this basic goal of providing adequate infrastructure and services to residents of the Agricultural Reserve – *conditional upon clarification of the term “adequate infrastructure and services.”* We request clarification of this term, since we oppose inappropriate infrastructure that leads to urbanization of rural communities, farms and forests. A key example of this problem is sewer sprawl – the promotion, funding, and construction of sewer pipelines and other centralized sewage facilities into rural communities that are now served with septic systems. In 2017 and 2018, MCA worked closely with County councilmembers and partner groups to support increased landowner educational and technical supports for septic system maintenance and improvements, and to prevent the incursion of sewer pipes into rural and low-density neighborhoods. These commitments to

rural landowners were partially reflected in the update to the County's Ten Year Water and Sewer Plan.

Historic African American Communities in the Ag Reserve Need to be Highlighted.

Take note: There is an absence of recognition of the importance of the historic African American communities in the Reserve. Can staff give some thought as to their inclusion as important assets? See: <https://www.heritagemontgomery.org/moco-history/historic-african-american-communities/>Moreover,

We support the expansion of broadband services to the Reserve. The General Plan should acknowledge broadband as a essential utility for all residents, including those communities in the more urban and suburban zip codes that are under served,

Policy 7.4.6: Maintain agriculture as the primary land use in the Agricultural Reserve through policies, regulations, easements and incentives. Promote farming, support farmland and open space conservation, protect environmentally sensitive areas, respond to climate change and ensure that rural complete communities are compatible with the intent of the Reserve.

Comment: MCA strongly supports this as a core Policy under Goal 7.4. We request that it be placed closer to the top of this list of Policies.

Policy 7.4.7: Balance support for an evolving agricultural industry with the conservation of farmland, rural open space and environmental resources in the Agricultural Reserve.

Comment: MCA and its partners don't fully understand what this proposed Policy means, but we think it means that the Planning Board sees "an evolving agricultural industry" as being, or potentially being, at odds and in conflict with, "the conservation of farmland, rural open space and environmental resources in the Agricultural Reserve." Rather than casting the evolution of agriculture as needing to be balanced with farmland, open space, and the natural resources of the Ag Reserve, (since balancing two things usually implies that these things are disparate or in conflict), MCA requests that this proposed policy be reworded as follows:

Policy 7.4.7: Work with local, regional, national and international experts in regenerative agriculture in support of the robust contribution of the farmland, rural open space and environmental resources of the Agricultural Reserve to Montgomery's economic health, social and racial justice, food and water security and climate resilience. The term "regenerative agriculture" is defined as: "*Farming and forestry that regenerates the living soil community, sequesters carbon, and contributes to the health of local ecological and human communities.*"

If this revision is not adopted, then MCA requests that this entire proposed policy be omitted.

Comment on this requested replacement text for Policy 7.4.7: For the last few decades our Montgomery County Soil Conservation District has focused on 'protection of the soil'. In the last 7-8 years they have begun promoting 'improving soil health'- practices that make it more nutrient dense and increasing the water-holding capacity. As a stated goal, this

General Plan should direct our county Office of Agriculture to promote improving soil health. Better soil will dramatically help mitigate climate change by absorbing water during intense rain events, retaining water during drought, sequestering carbon and by providing better food and higher yields as food becomes scarcer. Subsidies, incentives, training and guidance for farmers in regenerative practices should be among the goals for the agricultural sector.

Policy 7.4.8: Establish food production and distribution infrastructure to enable county growers to process their products locally and to reach residents through culinary, grocery and wholesale outlets. This system will increase the competitiveness of farmers and reduce reliance on imported agricultural products and associated carbon emissions.

Comment: MCA supports this proposed Policy. We stand ready to step up our collaboration with Montgomery County planners, other county staff, and food system partners to support and help implement this policy based upon our decades of experience in establishing farmer's markets and other food distribution networks.

MCA comments on other text within Theme 7:

Goal 7. Diverse and Adaptable Growth - Page 54:

Under "Issues and Challenges," the third paragraph beginning, "On the positive side, the Agricultural Reserve has significant value as a tool to preserve farmland and rural open space..." is problematic and must be amended in order to avoid creating a conflict between the Agricultural Reserve and urban, industrial, and commercial land uses.

The sentence "*But there are competing demands for land and other purposes, such as solar energy production, which put pressure on the Agricultural Reserve*" and the following sentence about the challenges, are highly problematic. Of course there are competing demands for the land in the Agricultural Reserve; this is not a new challenge. What is new is the Planning Board's promotion of competing uses including solar. These sentences are thus misleading since the Planning Board is an active supporter of large-scale solar in the Ag Reserve, and in that sense not merely a receiver of others' demands. MCA asks that this sentence on "competing demands" be omitted from this text.

The text referring to: "*the loss of contiguous farmland*" and "*lack of funding to purchase preservation easements*" is listing problems facing the Ag Reserve that are within the realm of Montgomery County to solve through fiscal, regulatory, and legal mechanisms. A full section addressing these particular challenges and approaches to solving them is needed – again in full coordination with the Office of Agriculture and the County's Climate Action Planning group.

In addition, these sentences mis-direct the focus of this section, which needs to be on describing the positive functions of the Ag Reserve that both honors the present farming community, and anticipates how this community will evolve to 2050 and beyond. As Montgomery County continues to add population and to densify urban and suburban areas, the role of the Ag Reserve and our Park system in providing beauty, healthy recreation, food, water, and other essential ecosystem services that enable our city living – will grow in importance.

Under “Vision for Diverse and Adaptable Growth” (pg. 54): We strongly support the sentence, “Residents have access to healthy, local food provided through agriculture integrated into urban and suburban neighborhoods and increased local food production in the Agricultural Reserve.” To this we request adding: “Farms, native plant and tree nurseries in the Agricultural Reserve will supply plants and soil amendments for the growing organic lawn care, native-scaping, and urban community gardening movements in Montgomery County.”

Managing Growth as a Mature, Built-Out County – page 55.

In the paragraph that starts, “Since the future is unpredictable...” There’s a sentence that reads, “We must manage growth and development as a mature, built-out county by maximizing use of constrained land, and explore new mechanisms to evaluate and deliver public facilities and infrastructure improvements.” What does the phrase “constrained land” mean in this context? If it means “already-built land” e.g. grayfields and brownfields, then this sentence is in line with smart growth principles and we support it. If, on the other hand, this phrase “*maximizing use of constrained land*” means something else such as opening up parkland, conservation land, or forests and farmland to urban, suburban, industrial and commercial uses, then we strongly oppose it and request that it be deleted.

Goal 7.3 “Manage future growth and development...”

We repeat an earlier question: what does the phrase “Constrained land” mean?

Policy 7.3.2. This reads, “*Develop new methods of funding public infrastructure by capturing increases in land value due to growth, development, and increased density.*” In order for us to know how to respond to this, it first needs to be unpacked so we know what it means and what the cascading ripple effect will be if this policy is enacted. We don’t understand what this “land value capture” for “delivery of public facilities and infrastructure” will mean to County residents, farmers and all landowners in the Agricultural Reserve. Please explain and unpack it.

Policy 7.3.4. “Expand use of public-private partnerships...” we have the same request as above: please unpack and explain what this means and what it entails.

Goal 4. Safe and Efficient Travel

Comment: this section of the draft is silent on transportation goals for the Agricultural Reserve. We propose adding the following:

To Goal 4.7: “Convert auto-centric transportation corridors into safe, people-centric multimodal streets with rail and BRT. Most travel to, from and within transportation corridors will occur via walking, bicycling and transit.”

Add an additional sentence: “Avoid creating new auto-centric transportation corridors.” So the new Goal 4.7 text will read:

Goal 4.7: Convert auto-centric transportation corridors into safe, people-centric multimodal streets with rail and BRT. Most travel to, from and within transportation corridors will occur via walking, bicycling and transit. Avoid creating new auto-centric transportation corridors.

Include these Policies and Actions within revised Goal 4.7:

Policy 4.7.4: In support of the goal to avoid creating auto-centric transportation corridors, eliminate or reject historically drawn or future proposed highway/throughway/bridge projects in or adjacent to the Agricultural Reserve.

Action 4.7.4.a: : Explicitly withdraw Montgomery County's membership in, and support for, any regional and State of Maryland transportation planning and priority-setting efforts and intergovernmental consortiums that are promoting highway and bridge construction or expansion in or near the Agricultural Reserve, including a second bridge crossing over the Potomac.

Policy 4.7.5: Ensure that the system of designated Rustic Roads is protected and maintained to preserve important historic and natural features enabling a strong agritourism benefit to both farms and residents.

Action 4.7.5.a Montgomery County Planning Department in coordination with MC-DOT and Office of Agriculture, along with producers and advocates for the Agricultural Reserve, review and recommend safety measures, such as reduced speed limits, for Rustic Roads and all roadways in the Agricultural Reserve with the goal of increasing safe travel for bicyclists and pedestrians, while continuing to protect Rustic Roads.

6. Healthy and Sustainable Environment

Overall comments:

Much of this section is on climate change, which is appropriate given the ongoing climate disruptions we are already experiencing. The role of the Parks system in protecting our large network of natural green infrastructure areas needs to be prominently featured in this section. We provide comments below that place the Ag Reserve and our Parks System as the first and second priority Policy areas.

Detailed section-by-section comments:

Issues and Challenges: page 48 – In the paragraph starting, “Montgomery County is a leader...” the second sentence implies that our leadership status is in jeopardy due to the declining ecological indicators. While this may be true, a more positive way of stating this would be:

“Indicators such as stream water quality, forest loss, loss of plant and animal species, and increased imperviousness, heighten our challenges as stewards.”

Vision for Healthy and Sustainable Environment

After the sentence, “Reliance on cars is significantly reduced,” insert the sentence, “Planned and proposed highway projects, including M83, and the proposed expansion of I-270 and I-495, have all been cancelled and removed from master plans and County transportation priorities.”

Urbanism as the Key to True Sustainability: page 48 – We disagree with the assertion here that urbanism is *the* key to true sustainability. We would agree with a statement to the effect that “urbanism is *a* key to true sustainability”. So we suggest a new title for this section: Keys to Sustainability: Urbanism and [Agriculture] [Rural Preservation]

Comment: This section needs to be edited to reflect the fact that Urbanism – the promotion of city living and densely-built landscapes – can be a key to sustainability, when it’s not an isolated focus of planning, but rather combined with preservation and wise conservation of rural lands and waters. This is our life support system: the forests, farms, and wetlands that supply us with clean drinking water, food and fiber. In Montgomery County the foundation of our life support system is our Agricultural Reserve and our Parks System.

Paragraph starting at the bottom of page 48 – this important paragraph highlights the role of the Agricultural Reserve, and our Parks System, and needs to name the Piedmont Sole Source Aquifer as a crucial water resource in our Ag Reserve.

Page 49 –To the paragraph starting, “We must continue to address the threat of climate change...” add this sentence: “In 2019, six expert working groups, comprised of county residents with both knowledge and passion in the field of climate change, reported out hundreds of recommendations that form the raw material and basis for the forthcoming Climate Action Plan. It is the intent of Thrive 2050 to be closely integrated with the CAP.”

Page 49 – After the paragraph that starts, “Thrive Montgomery 2050...” add another paragraph that starts, “Thrive Montgomery 2050 is also proposing to embrace regenerative agriculture and forestry, in order to provide increased and reliable supplies of food, fiber, forest benefits, and clean water.

The food and water security, carbon capture/sequestration, and climate adaptation resulting from enhanced ecological landscape management practices are equally important alongside carbon emissions reduction.”

Goals, Policies and Actions

Goal 6.1: “Use a compact form of development...”

Policy 6.1.1.: “Accommodate future growth through a compact form of infill and redevelopment to create long-term sustainability for both human and environmental health.”

Actions 6.1.1.a. and 6.1.1.b. These two actions combine compact urban living with the provision of open spaces for active recreation. We note that “active recreation” includes non-consumptive, conserving uses such as hiking, bird-watching, forest air bathing, and nature photography.

Comment: Along with the well-known benefits of urban density increases, there are significant drawbacks to conurbations - canyons of concrete and glass. To be welcoming to humans, such densifying neighborhoods require increased public parklands with tree groves, and other types of open space and green public common space. Funding beyond developer dedications is needed to ensure adequate parkland in our urban areas. The wording of this Goals section needs to reflect that a “compact form of infill and redevelopment” will be balanced with stepped-up public funding for Legacy Open Space and other acquisition funds enabling new public parks in all of our urban areas.

Page 51: Policy 6.2.7.: “Expand the capacity of the Agricultural Reserve to provide essential contributions to the county’s efforts to reduce, mitigate and adapt to climate change.” As Lee Langstaff noted in our zoom meeting with planning staff on 7/29/20, this Policy section is a red flag for us. We are concerned that this wording can be read as intended, under the banner of climate change, to open up the Agricultural Reserve to non-agricultural uses.

Such a move would violate the purpose and intent of the Ag Reserve, which is to preserve farmland, open space and forests in order to enable local production of food, fiber, forest benefits and clean water supplies. Instead, we point to the fact that the original core role of the Ag Reserve – agriculture – is a large basket of climate solutions. We ask that Thrive 2050 adopt the principle of “First, do no harm to our existing, natural systems – our Ag Reserve, Parks System, and other natural areas.” These provide our life support system, including food, clean air, and clean water supplies, along with climate resilience and carbon sequestration.

We object to Policy 6.2.7. as worded. We suggest this text in substitution:

“Expand the capacity of regenerative agriculture in the Agricultural Reserve. Through building up soil carbon levels and greater use of multi-species communities of vegetation, farms and forests in the Ag Reserve will provide essential contributions to the county’s efforts to reduce, mitigate and adapt to climate change.”

Comment: Responding to the climate emergency, meeting carbon reduction goals, and climate resilience goals, requires a wholistic planning effort that is still going on. The proposed ZTA for large-scale solar in the Ag Reserve would short-circuit that process by enabling non-agricultural use. The

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short, mid-range, and long-term economic impact of the onset of large energy facilities in the Ag Reserve, including their ripple effect on land rents, taxes, infrastructure, land valuation and availability, has not been studied and is of grave concern to future food and water security related to the stability, diversity, and growth of farms and forestlands. Montgomery Countryside Alliance and allied groups, including and especially commercial agriculture are opposed to this ZTA and continue to ask the Council and Planning Board to oppose it.