



March 4, 2024

Dear Councilmembers,

The Climate Coalition Montgomery County opposes ZTA 23-09, Farming-Incidental Outdoor Stays. This ZTA should be rejected and withdrawn as it does not meet the fundamental purposes of the Agricultural Reserve to preserve working farms, open space, and water resources, and has negative impacts on equity, greenhouse gas mitigation, the future of local food production, and resilience.

The proposed ZTA will have a negative impact on Racial Equity and Social Justice¹ by raising land prices and reducing equitable access for farming. And it portends a negative impact on carbon sequestration through the loss of soils and trees and potential greater energy intensive uses, as well as reduced resilience, described in the Planning Board's Climate Assessment.² Furthermore, with climate change the Reserve is increasingly important for local food supply.

The ZTA 23-09 seeks to allow commercial lodging on protected agricultural lands by changing the definition of "farming" in the zoning code. As written, up to ten motel style units (with bathrooms and no limit on square footage) would be allowed as an accessory to an agritourism operation. These lodgings could be constructed anywhere in the Ag Reserve – including on prime soils and on land encumbered by taxpayer-funded agricultural easements – and have no connection to farming.

When non-farming landowners can buy up land in the Ag Reserve for commercial lodging, farmers looking to buy or lease land for growing food and fiber will face significantly greater cost. The number one issue for farmers is access to land – the cost of land is a hindrance to the entry into farming for the diverse, next generation of farmers. Due to rising farmland prices, and the influence of commercial and industrial land speculators, small farms available to new producers in Montgomery's Ag Reserve are increasingly scarce. We must turn this situation around, beginning with rejecting proposals for non-farming uses in the Ag Reserve.

Land uses that would compete for farmland in the only area of the county set aside for farming must be very carefully considered with stakeholder input from the beginning. If you want to help farmers, ask what they need and then listen. Making a wholesale zoning change to serve the interest of one landowner is not in the collective best interest of the County as a community and is bad policy. There are

¹ <https://montgomeryplanning.org/wp-content/uploads/2024/01/C-CA-ZTA-23-09-Incidental-Outdoor-Stays.pdf>

² Contrary to the Office of Legislative Oversight's RESJ Assessment for this ZTA and for ZTA 23-08, it is perplexing that they would claim that the Reserve's creation in 1980 would be cited as a cause of inequity in the Reserve. Without the creation of the Reserve, sprawl development would have consumed most of the land within its boundaries -- likely on the larger costly suburban lots that were rapidly being developed at the time of its creation - which would have propagated inequitable access that we see elsewhere in the County, rather than affordable housing or food and fiber farms. Instead, there has been a shifting demographic with more BIPOC, immigrant, women, and veteran producers seeking access to affordable farmland here; those who did find suitable farmland are now growing diverse products for local and regional markets (<https://moco360.media/2023/03/10/effort-aims-to-cultivate-diversity-among-montgomery-county-farmers/>, <https://www.mocoalliance.org/uploads/4/8/8/6/48867647/incubator.pdf>).

In recent years, young and ethnically diverse farmers have been blocked or delayed in starting up farms in the Ag Reserve, as farmland prices under development pressures have risen steeply.

challenges to farming in this County but this ZTA seeking to change the definition of farming is not helpful to current and future farmers.

The Climate Coalition Montgomery County stands with the agricultural groups, community associations, and other stakeholders who have stated clear and firm opposition to ZTA 23-09.

Please withdraw and defeat this ZTA.

Climate Coalition Montgomery County – Member Organization Signatories

- 350 Montgomery County
- ACQ Climate (Ask the Climate Question)
- Bethesda Green
- Biodiversity for a Livable Climate
- Chesapeake Climate Action Network
- Environmental Justice Ministry Cedar Lane Unitarian Universalist Church
- Ecosystems Study Group
- Green Sanctuary Committee of the Unitarian-Universalist Church of Silver Spring
- Montgomery County Faith Alliance for Climate Solutions
- Montgomery Countryside Alliance
- One Montgomery Green
- Poolesville Green
- Safe Healthy Playing Fields
- Sugarloaf Citizens' Association
- Coalition for Transit Alternatives to Mid-County Highway Extended/M-83 (TAME)
- The Climate Mobilization Montgomery County
- Takoma Park Mobilization Environment Committee (TPMEC)
- Zero Waste Montgomery County