

To: Montgomery County Council Members

ZTA 23-09 is so problematic it needs to be withdrawn. Stakeholder involvement was completely missing from the conceptual process that produced it. As someone who spent several years as a representative on two county sponsored committees on agritourism, I have a pretty good understanding of both *what is* and *what isn't* agritourism, as well as what it's like to offer opportunities to stakeholders for involvement. This ZTA fails on both accounts. Neither farmers nor other residents of the Ag Reserve were consulted. It's pretty clear that no one involved in creating this ZTA even bothered to read the 7/1/2019, "Montgomery County Agritourism Study Comparative, Review of Agritourism Policies," https://montgomerycountymd.gov/agsservices/Resources/Files/AAC_Meetings/September2019/Attachment3_ComparativeReviewandCodeAssessment.pdf or the Montgomery Planning report that also emerged from that process: <https://montgomeryplanning.org/wp-content/uploads/2019/12/Agritourism-Study-and-Appendices.pdf>

Although there may be denial, Montgomery County residents are clever enough to understand that the genesis of this ZTA came from a brash, new landowner who's decided that they want overnight accommodations and a spa for profitmaking on the farmland they purchased--farmland that has TDRs and other protective covenants on it, (at a considerable dollar cost). It's in the press, where this individual said [in a WTOP interview](#) "*Imagine going to the Ritz-Carlton or the Four Seasons" where each unit would be "like a small cabin," but cushier. "Like any high-end hotel" but "not over the top."*

I wonder how that would look in an OLO review of equity? How well does it help our County's climate change goals? This ZTA also cites Maryland's addition of "incidental overnight stays" to the state's definition of agritourism. That change was an effort to allow tent camping and RVs as an additional revenue stream for farmers—not to encourage constructed commercial overnight accommodations! Simple ignorance of what the state change meant—or something else?

What about well and septic? Our clay soils severely limit where septic systems can work—and that is part of the mechanism that helps preserve farmland in the Ag Reserve. The ZTA says 10 structures would be allowed, each with a bathroom. Does that mean 10 septic systems, or will they be allowed to share septic systems—and if the latter, what kind of precedent does that set? All of the reserve is on well water—and all of that water is drawn from the same sole source aquifer.

Much farming in the Ag Reserve occurs on leased land. Allowing for construction of overnight accommodations as an accessory to an accessory to agriculture, a higher-profit activity than farming would drive up the value of farmland, making it less and less feasible for farmers to afford leasing it.

Those of us who are concerned with food security—the lack of which was brought into very clear focus during the pandemic—are looking to the Agricultural Reserve to grow more of the food that the region eats. Both the Montgomery County Food Council and the Montgomery County Office of Food Systems Resilience, (the latter launched in 2023) recognize that a key part to assuring improved access to healthy, fresh food is getting more of it grown nearby! Constructing overnight accommodations for the wealthy is antithetical to Ag Reserve farmers' ability to grow more food.

I stand in opposition to this ZTA, and ask that you table it. Perhaps establish an authentic stakeholders group, including county staff who have read the agritourism reports I cited above, and see what might actually help farmers in the Ag Reserve.

Sincerely, Ellen Gordon
Dickerson, MD