



February 25, 2010

Dear Council President Floreen and County Council members:

Re: BLTs and the CR Zone

We appreciate your diligence in tackling the complex CR zone. Improvements made by the Council are much appreciated. Specifically, adding language that BLTs would be mandatory and not optional, that the CR zone must be recommended and approved in Master Plans, and that the zone can only be used near Metro or fixed, dedicated transit lines.

However, we are concerned about the low percentage allotted for purchase of BLT's. According to Council staff, BLT purchases for 5% bonus density will yield only 31 BLTs over 31 years in White Flint as it builds out. It seems a woefully low number, especially for White Flint, which has so much greater density than other plans in the County. Moreover, the optional purchase of BLTs for up to 30% density, will likely not become a reality because developers can choose other "fee-free" density incentive options from the CR zone menu.

We respectfully request that you consider increasing the BLT bonus density to 15% instead of 5% for several reasons. The predicted low yield of BLTs does not allow a reasonable trade off to county residents in return for such high density. The Agricultural Reserve is an acknowledged treasure for all county residents as well as the greater Washington metropolitan region. Indeed, the importance of having an effective BLT program was highlighted by the council appointed Ad Hoc Agricultural Policy Working Group as being essential to the future of agriculture and to the preservation of the Agricultural Reserve. By adjusting the number upwards, more valuable farmland will be preserved in perpetuity. But if the 5% figure stands, farmers and county residents will be short changed with little to show in terms of significant protection of farmland in the Reserve.

With regards to the TMX zones in Germantown and Twinbrook, where BLT's are mandatory for 30% bonus density, developers will likely ask the Council for an equivalent downsizing to 5%, resulting in far fewer BLT's over time. For this reason, we ask that you also consider adding language to the CR zone written opinion, making it clear that the lower percentage and the CR zone will not be applied to the TMX zone.

We thank you for considering our requests for these targeted adjustments.

Sincerely,

Dolores Milmoie
Maryland Conservation Advocate
Audubon Naturalist Society

Caroline Taylor
Executive Director
Montgomery Countryside Alliance

Gary Valen
President
Sugarloaf Citizens' Association

David Hauck
Chair
Sierra Club, Montgomery County