

"Representing the Agricultural Producers of Montgomery County"

September 27, 2025

Councilmember Andrew Friedson, Chair, PHP committee

Councilmember Evan Glass, Chair T&E committee

Montgomery County Council
100 Maryland Avenue
Rockville, MD 20850

Subject: ZTA 25-10 Comments and Concerns

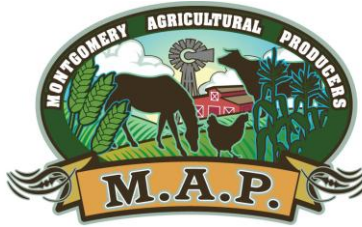
Dear Councilmembers Friedson, and Glass,

We are writing to express our concerns about the impacts of ZTA 25-10 on Maryland homeowners, businesses, communities, and the environment. If passed, ZTA 25-10 would not only require 50% native plantings in open spaces under Division 6.3. Open Space and Recreation but it would also place restrictions on people's ability to choose what they plant on private property by adding requirements under 6.4.3 (B)(1)(d) to require 50% native plantings under Division 6.4. General Landscaping and Outdoor Lighting under Chapter 59 of the Montgomery County Zoning Ordinance.

The addition of these requirements will place an unnecessary burden on Montgomery County homeowners, builders, public works officials, etc. with little to no positive impact on the environment. Please see a detailed list of our comments below which are documented in well-known scientific principles, plant physiology, botany, phylogenetics, and academic research published in peer-reviewed scientific journals.

Economic Impacts of ZTA 25-10

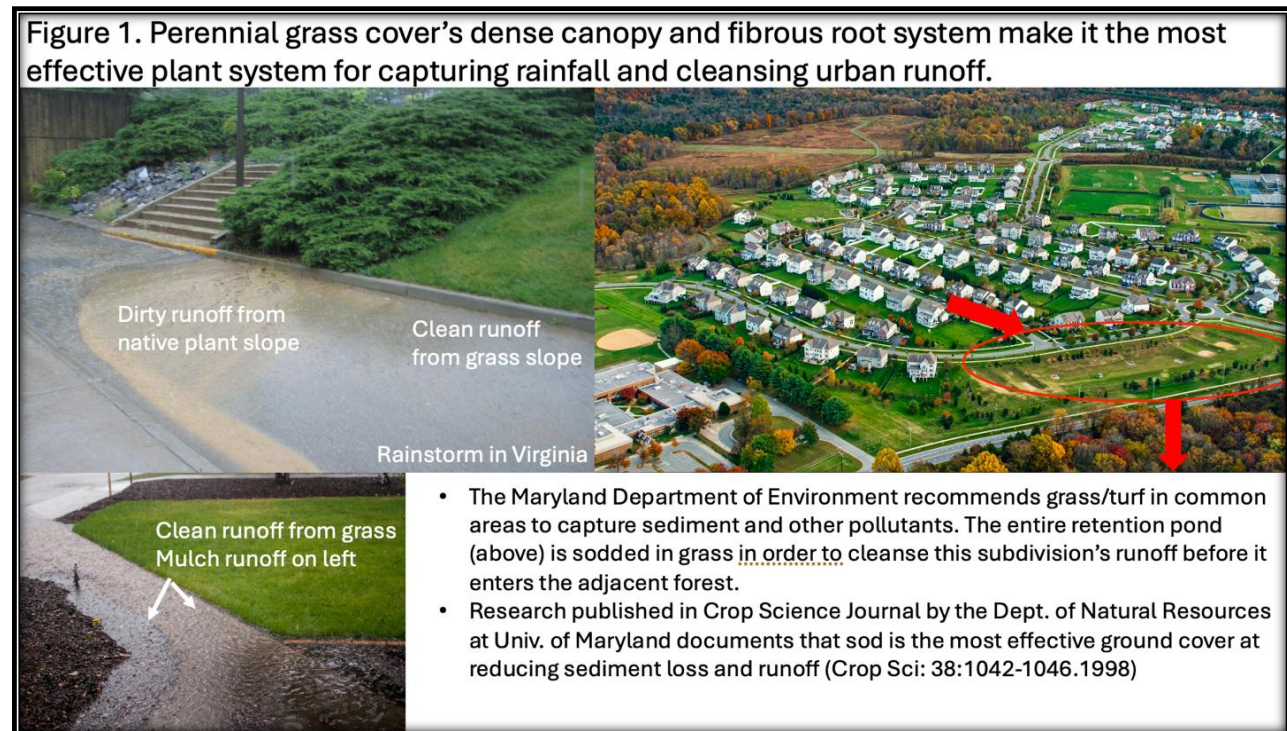
- There are only 24 retailers listed on the Maryland Native Plants Program [website](#). There is simply not enough plant material in the state to implement a 50% native plant requirement on private residential lots under 6.4.3 (B)(1)(d). This lack of supply would significantly drive-up costs of home construction and increasingly price Maryland consumers out of starter homes.
- Natural grass sod costs approximately \$0.55 cents per square foot. A typical native ground cover such as Moss Phlox (*Phlox subulate*) currently retails in Maryland for \$10.99 per 6" pot. A 50% native plant requirement would result in scenarios like below on a typical 2,000 sq ft residential lot.
 - \$550 for 1,000 sq ft of sod, including installation
 - \$5,495 for 1,000 sq ft of Moss Phlox, not including installation
- This added cost would be passed onto homeowners in an already expensive housing market.

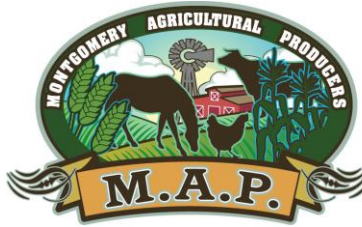


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Environmental Impacts of ZTA 25-10

- Many of the principles and rationales listed in this ZTA are not supported by scientific research. Some examples include the following:
 - Natural grass sod is the most effective ground cover for reducing and filtering runoff (Figure 1). In fact, the Maryland Department of Environment (MDE) lists grasses and turf in their official guidance for Protecting [Stormwater Best Management Practices During Construction](#).
 - Research published in 2018 in the journal of Ecological Applications shows that grasses account for 87.9% of all water quality regulation, 81.2% of all runoff regulation, and 89.9% of all carbon storage in a typical urban/suburban setting of open space, forests, and low/medium density residential lots. (Ecol. Applications. 28(3). pp. 643-648. 2018).
 - Legislation to begin requiring 50% native plantings would dramatically reduce the Ecosystem Services provided by lawns and open space and is counter to current scientific research.
 - There is plenty of academic [research](#) to show that the soil microbiome beneath turf is thriving with soil micro-organisms. The high carbon sequestration rates and fibrous root systems of grasses create an ideal environment for naturally occurring soil microbes and insects.





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Fundamental Flaws in Selecting Plants based on Origin (Native vs Adapted Plants)

- There are fundamental problems with separating plants based on origin and whether a plant was native to the US prior to European Settlement in the 1600s.
 1. Plants don't know man-made borders, they know habitats. A plant that evolved in Europe under similar rainfall, temps, and soil types can easily be successful in Maryland.
 2. Suburban environments in Maryland are dramatically different than they were at the time of European settlement. Black bears, bald eagles, and other organisms that were successful in Maryland 400 years ago are much less successful in urban Maryland today because the environment is so dramatically different. This same principle applies to plants.
 3. All plant systems (turf, native, or otherwise) require inputs and would otherwise naturally progress into forest systems through a process called Ecological Succession.
 4. Plant selection should be based on performance, not origin.

We strongly urge an unfavorable report on this ZTA. It would place an undue financial burden on builders, county and state personnel, and consumers and is not based on academic research or scientific and environmental principles. It would not result in any net positive benefit to the citizens or environment in Montgomery County Maryland or surrounding areas and would come at a great expense to Montgomery County residents and businesses.

Sincerely,

Wade Butler
Chairman Montgomery Ag Producers

CC; Montgomery County Council Members