



26 April 2022

Montgomery County Planning Board

Dear Planning Board Members,

Friends of Sligo Creek supports strengthening the County's Forest Conservation Law, consistent with the recommendations of the Montgomery County Forest Coalition, as an active member of that coalition. Friends of Sligo Creek is a nonprofit environmental group dedicated to protecting, improving, and appreciating the ecological health of Sligo Creek Park and its surrounding watershed.

We specifically ask the Planning Board to recommend legislation to the County Council that:

1. Protects existing forest ecosystems as the top priority. These should not be removed at all without a variance, based on strong justification;
2. Requires Forest stand delineation to be evaluated & submitted to Planning prior to submitting any application plan for development of a site. This will save developers' time and money as well as saving the most possible forest;
3. Strengthens replanting ratios to 2:1 in all cases;
4. Strengthens replanting requirements to require the planting of forest ecosystems, not just trees. When the forest ecosystem is what's being removed, that is what needs to be replaced as close as possible;
5. Strengthens watershed considerations so that forest ecosystem replanting improves the water quality of our communities in specific watersheds, and incentivizes replanting within Montgomery County, not outside of our county;
6. Tightens requirements around forest conservation easements as a prevention so they cannot be easily extinguished or relocated.

Forests are the first line of defense and the solution to climate change in many ways. Existing forests should be protected. When they cannot, repeat, cannot be saved, replacement forests must replicate them to the greatest extent possible. We focus our attention on saving forests, not just because of their beauty, but also for their flood and stormwater mitigation, water quality protection, cooling, capture of sediment and other pollutants, and health effects for humans as well as to a healthy biome. They should be considered and classified as critical natural infrastructure.

For the Sligo watershed, we well understand how even a narrow, forested area can serve all the above critical functions. We have seen again and again how infill development puts increased and virtually impossible pressure on the remaining forest to capture stormwater and pollutants, as well as to support an increasingly stressed biome.

Montgomery is losing forest at a high rate, apparently fifth highest in the state, and already has relatively little forested area. No net loss of forest is not only a great slogan: it is critical to the health of the county and the world. It doesn't happen by itself. The Planning Board and the County can make it happen only by regulation and enforcement, rule by rule, law by law, decision by decision.

Pressure on forests doesn't just come from development: diseases including Emerald Ash Borer and Oak Blight in recent years have decimated some of the biggest trees in our forests. So development pressures are not alone the risks to forests, but are some of the obvious decisions humans can make to save forests.

Please look again at the Planning Commission proposal to Council for Forest Conservation and strengthen the document to reflect these concerns.

Sincerely,

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