

## Item 4 - Correspondence

**From:** [Griffin Benton](#)  
**To:** [Anderson, Casey](#); [MCP-Chair](#)  
**Cc:** [Verma, Partap](#); [Patterson, Tina](#); [Fani-Gonzalez, Natali](#); [Cichy, Gerald](#); [Taddei, Kristin](#); [Pfefferle, Mark](#); [Jeff Robertson](#); [Mimi Kress](#); [Bundens@vika.com](#); [Larry Cafritz](#); [Andrew Der](#); [Kevin Foster](#); [Matthew Wessel](#)  
**Subject:** Proposed Changes to Forest Conservation Regulations  
**Date:** Wednesday, June 17, 2020 1:00:53 PM  
**Attachments:** [MBIA Forest Con Comments.pdf](#)

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Good Afternoon Chair Anderson and Commissioners,

Hope you are all doing well, wanted to share with you MBIA's comments (attached) to the proposed changes to the county's Forest Conservation Law. We met with planning staff on June 3<sup>rd</sup> and expressed our comments to them. Please do not hesitate to contact me if you have any questions or concerns.

Thank you,  
Griffin Benton

Griffin Benton  
Director of Government Affairs  
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Maryland Building Industry Association  
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Check out NAHB's Member Advantage Program at [www.nahb.org/ma](http://www.nahb.org/ma)

Casey Anderson  
Chair, Montgomery County Planning Board  
Maryland-National Park and Planning Commission  
8787 Georgia Avenue  
Silver Spring, MD 20910

**Re: Proposed changes to Chapter 22A. Forest Conservation- Trees Regulations of the Montgomery County Code**

**Dear Chair Anderson and Planning Commissioners,**

On behalf of the Maryland Building Industry Association (MBIA), this letter is in response to proposed changes to Chapter 22A. Forest Conservation- Trees Regulations of the Montgomery County Code. On May 7, 2020, we received an email from the Planning Department containing a document with modifications to numerous sections of the Trees regulations. The Planning Department will present these changes to the Planning Board on June 25, 2020. After the presentation, MBIA understands that there will be a public comment period. After the public comment period, the planning department plans to present final proposed changes to Chapter 22A Forest Conservation- Trees Regulations to obtain a recommendation that the proposed revisions be transmitted to the County Council.

The MBIA appreciates the opportunity to comment on the proposed changes and acknowledges that some of the proposed changes are necessary in order to comply with recent changes to the States enabling legislation and to update language to be compatible with other County regulations. On June 3, 2020, MBIA representatives met with Planning Department staff to walk through the proposed changes. Based on that meeting, the MBIA offers the following comments on the proposed changes:

**1- 22A.00.01.03- Definitions**

- a. Proposed definition 17) “Environmental Buffer” means perennial, intermittent, or ephemeral streams/channels and their associated buffers; wetlands and their associated buffers; and, hydraulically connected steep slopes according to the latest version of *Guidelines for the Environmental Management of Development in Montgomery County, Maryland* (MNCPPC), or an appropriate master plan; and floodplains.
  - i. This is a new definition that does not appear in any other regulation or approved policy document that we are aware of. Please confirm that the intent of this definition is to replace what has been referred to as an “Expanded Stream Buffer” and if there is any other reason for creating the new definition.
  - ii. Floodplain appears to be out of place in the sentence and should follow the other specific environmental features listed.

- iii. The definition is confusing in that it appears that an expanded stream buffer must include ephemeral channels because they are defined in the Environmental Guidelines. Ephemeral Channels are only regulated in the Ten Mile Creek Limited Master Plan Amendment. Please revise the definition to state “Environmental Buffer” means perennial or intermittent streams and their associated buffers; wetlands and their associated buffers; hydraulically steep slopes; and floodplains according to the latest version of Guidelines for the Environmental Management of Development in Montgomery County, Maryland (MNCPPC), or ephemeral streams/channels as applicable in an appropriate master plan.”
- b. Proposed definition 34) “Landscaping Credit” means areas shown on a forest conservation plan that are not forest but will receive credit toward a site’s reforestation or afforestation requirements. The forest conservation plan must show dimensions and details for tree planting and landscaping areas. Any planting for landscape credit to meet the forest conservation requirements must use native plants.
  - i. Please add “or cultivars of native plants” to be consistent with the revisions that were made to the forest conservation law in 2018.
- c. Proposed definition 46) “Priority planting area” means areas in which planting must occur unless those areas are not present.
  - i. Please clarify that planting in a priority planting area must occur only if required to meet the mitigation requirements of the forest law. This is consistent with the revisions that were made to the forest conservation law in 2018.
- d. Existing definition 52) (Renumbered) “Specimen Tree” means a tree that is particularly impressive or unusual example of a species due to its size, shape, age, or any other trait that epitomizes the character of the species as further described in the most recent version of the Trees Technical Manual.
  - i. This is a subjective definition and the revision to this regulation provides an opportunity to define a specimen tree using the objective criteria provided in section 22A.00.01.07 (5) of this code to define which trees will be regulated as a specimen trees. These objective criteria are also how the County has, in practice, determined which trees are specimens in the review and approval of NRI’s and Forest Conservation Plans and Exemptions. The objective criteria are as follows:
    - 1. an individual tree, and its critical root zone, with one or more of the following characteristics:
      - a. a tree that is part of a historic site or associated with a historic structure;
      - b. a tree designated as a national, state, or County champion tree;

- c. a tree having a diameter, measured at 4.5 feet above the ground, of 75 percent or more of the diameter of the designated state or County champion tree;
- d. trees which have a diameter, measured at 4.5 feet above the ground with a diameter of 30 inches or greater

## 2- 22A.00.01.05 Application

- a. Proposed revision to A. Except as provided in Sections 22A-5, 22A-6, 22A-7, 22A-8, 22A-9 and the Variance provisions in Section 22A-21 of the Forest Conservation Law, these regulations apply to the following plans for or regulated activities. The revision adds a number (7) which states, “clearing or grading conducted on two or more platted contiguous lots that collectively total 40,000 square feet or larger that are graded at the same time and where sediment control is required under Chapter 19 of the County Code.”
  - i. Please clarify the intent of this language and revise to make clear that this is when one sediment control plan is requested to cover more than one platted lot where sediment control/stormwater management measures will not be provided for each individual platted lot.
- b. Proposed revision to B. The general procedure for meeting the requirements of Chapter 22A for these plans is: The revision adds language to number (3) (a) which states, lot lines, building, and proposed infrastructure, located to maximize retention areas and avoid environmentally sensitive areas such as environmental buffers and protected habitats wherever practical;”
  - i. Please define “protected habitats” to clarify that these are known publically documented habitats for rare, threatened or endangered species or habitats identified during the preparation of an approved natural resources inventory.

## 3- 22A.00.01.06 Natural Resource Inventory and Forest Stand Delineation (NRI/FSD) Requirements

- a. Proposed revision to A. Natural Resource Inventory (NRI) application must be considered complete if it contains all the following information: The revision adds a number (5) which states, “ephemeral channels/streams and buffers for those locations where such buffers are required per the latest version of the *Guidelines for Environmental Management of Development in Montgomery County, Maryland* (MNCPPC) or appropriate master plan;”.
  - i. This revision is confusing in that it appears that the Environmental Guidelines require ephemeral channels to have buffers. Ephemeral Channel buffers are only required in the Ten Mile Creek Limited Master Plan Amendment. Please revise the text to remove “Guidelines for Environmental Management for

Development in Montgomery County, Maryland (MNCPPC)” and only refer only to an applicable master plan.

- b. Proposed revision to A. Natural Resource Inventory (NRI) application must be considered complete if it contains all the following information: The revision adds a number (12) which states, “Trees that are specimens for their species;”
  - i. This is subjective and should be removed. In practice a specimen tree is defined using the objective criteria provided in section 22A.00.01.07 (5) of this code to define which trees will be regulated as a specimen trees. These objective criteria are how the County has, in practice, determined which trees are specimens in the review and approval of NRI’s and Forest Conservation Plans and Exemptions. The objective criteria are as follows:
    - 1. an individual tree, and its critical root zone, with one or more of the following characteristics:
      - a. a tree that is part of a historic site or associated with a historic structure;
      - b. a tree designated as a national, state, or County champion tree;
      - c. a tree having a diameter, measured at 4.5 feet above the ground, of 75 percent or more of the diameter of the designated state or County champion tree;
      - d. trees which have a diameter, measured at 4.5 feet above the ground with a diameter of 30 inches or greater

#### **4- 22A.00.01.07 Priorities for Retention**

- a. Proposed revision to A. The following areas trees, shrubs, plants, and specific areas are considered the highest priority for retention areas for and protection and must be left in an undisturbed condition unless the Planning Director or Planning Board find that the provisions of subsection 22A-12(b)(1) of the Forest Conservation Law, have been met and the development proposal cannot reasonably be altered: The revision adds a number (3) which states, “trees, shrubs, or plants identified on the list of rare, threatened, or endangered species;”
  - i. Please identify that this is the State of Maryland list of Rare, Threatened or Endangered Species.

#### **5- 22A.00.01.08- General Forest Conservation Plan Provisions**

- a. Proposed revisions to A. that reads “In developing a forest conservation plan, the applicant must give priority to techniques for maximizing retention of existing forest on the site. The forest conservation law specifies percentages of all forest sites which, at a minimum should be preserved. Applicants should strive to maximize forest retention whenever practical.”

- i. A Natural Resource Inventory requires that all forest stands delineated on a site be prioritized for retention. Please revise the paragraph to clarify that “Applicants should strive to maximize retention of high priority forest stands whenever practical.”
- b. Proposed revisions to E. (2) (b) that states, “establish or enhance forest in buffers adjacent to ephemeral streams, when such streams are required to have buffers as recommended in an applicable Master Plan or in the latest version of the *Guidelines for Environmental Management for Development in Montgomery County, Maryland* (MNCPPC).”
  - i. This revision is confusing in that it appears that the Environmental Guidelines require ephemeral channels have buffers. Ephemeral Channels are only regulated in Ten Mile Creek Limited Master Plan Amendment. Please revise the text to remove “Guidelines for Environmental Management for Development in Montgomery County, Maryland (MNCPPC)” and only refer only to an applicable master plan.
- c. Proposed revisions to E. (3) (c) after the chart, notes 4 and 5. Both notes require no deer browse for surviving planted tree stock.
  - i. Please revise to allow minimal deer browse as trees can survive with minimal deer browse.
- d. Proposed addition to F. Tree Save Plans (4) that states, “The tree save plans must identify methods to preserve and protect on-site or off-site trees along the limits of disturbance regardless of tree size.”
  - i. Please clarify the intent of this language. All trees with a diameter at breast height of 24” and greater within 100’ of the property are shown on a tree save plan. Is there a minimum tree size this intends to protect? Are there general notes or standards that could be placed on the plan that could achieve desired protections? As trees gets smaller, so do their critical root zones and it is not always possible to access adjacent properties due to lack of permission or physical barriers making accurately locating small trees difficult. Please clarify and consider what is required by law when tree limbs and critical root zones encroach onto an adjacent property.

#### 6- 22A.00.01.09 Forest Conservation Plan Requirements

- a. Proposed addition to B. Final Forest Conservation Plans (2) (g) (vi) that states a tree protection plan must show, “an arborist report that shows the methods to be utilized to protect any tree, 24” dbh and greater, when the critical root zone is impacted;”
  - i. Please revise as discussed during the 2018 revision to be required only when saving trees with greater than 30% critical root zone impacts.



- b. Proposed addition to B. Final Forest Conservation Plans (2) (g) (vii) that states, “An arborist report may be required, on a case-by-case basis, for trees less than 24” dbh, when the critical root zone is impacted.”
  - i. Please clarify under what circumstances this would apply.
- c. Proposed addition C. Noticing Requirements for Final Forest Conservation Plans that states, “Applicants that require approval of a forest conservation plan must follow the noticing requirements in Chapter 50/9.00.01.04”
  - i. Please clarify that this does not apply to forest conservation exemptions or forest conservation plans associated with another development application that requires public noticing. This is for standalone forest conservation plans only.

We appreciate the opportunity to provide comments on the proposed changes and are available to answer any questions that you may have. If you have any further questions, please contact Griffin Benton, MBIA - Director of Government Affairs at [gbenton@marylandbuilders.org](mailto:gbenton@marylandbuilders.org) or 202-815-4239.

Respectfully,



Matthew Wessel, PLA, ISA Certified Arborist  
Chair, MBIA Environmental Committee

**From:** [Denisse Guitarra](#)  
**To:** [MCP-Chair](#)  
**Cc:** [Eliza Cava](#)  
**Subject:** Audubon Naturalist Society testimony on Item 4 -Amended Forest Conservation Regulations  
**Date:** Tuesday, June 23, 2020 11:01:23 AM  
**Attachments:** [image001.png](#)  
[2020\\_06\\_23\\_ANS\\_Testimony\\_Item\\_4\\_Amended\\_Forest\\_Conservation\\_Regulations.pdf](#)

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Dear Montgomery County Planning Board Members,

Please find attached in this email Audubon Naturalist Society's written testimony ahead of the upcoming Planning Board's June 25 public hearing (Item 4 -Amended Forest Conservation Regulations). If you have any questions, please do not hesitate to contact us.

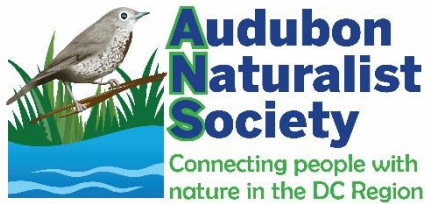
Thank you,  
Denisse Guitarra



**Denisse Guitarra**  
Maryland Conservation Advocate  
Pronouns: she / her / ella  
[denisse.guitarra@anshome.org](mailto:denisse.guitarra@anshome.org)  
cell: 240-630-4703

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June 23, 2020

**Written Testimony for Staff Draft of Amended Administrative Regulations for Chapter 22A, Forest Conservation Law, Public Hearing <sup>1</sup> for Montgomery Planning Board Hearing on June 25, 2020<sup>2</sup>.**

**Denisse Guitarra**

Maryland Conservation Advocate, Audubon Naturalist Society (ANS)

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Dear Montgomery County Planning Board,

For 123 years, Audubon Naturalist Society has inspired people to enjoy, learn about and protect nature. We thank the Montgomery County Planning Board for the opportunity to provide testimony for the proposed amended regulations as part of the county's Forest Conservation Law. ANS applauds Montgomery County for its long history as a leader in forward-thinking planning and environmental conservation. The County has long been a leader in the region and the nation in protecting and restoring the natural resources that make this county such a desirable place to live, work, and play. ANS asks the Planning Board to approve the proposed Forest Conservation Regulation amendments but to do so with the following additional recommendations:

**Overall Forest Conservation Recommendations**

- We would like to see changes in the Montgomery County Forest Conservation Law with the goal of achieving net zero loss of forests. Frederick County has recently revised their Law in such a way. Under today's climate crisis, preserving and protecting our trees should

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<sup>1</sup> Montgomery County Planning Board Regulation – Forest Conservation Law- May 21, 2020 Draft. Available from: [https://montgomeryplanningboard.org/wp-content/uploads/2020/05/Chapter-22A.-Forest-Conservation-Trees-Regulations\\_Proposed-Changes-2018\\_2020\\_Attachment-A.pdf](https://montgomeryplanningboard.org/wp-content/uploads/2020/05/Chapter-22A.-Forest-Conservation-Trees-Regulations_Proposed-Changes-2018_2020_Attachment-A.pdf)

<sup>2</sup> Montgomery Planning Board – June 25, 2020 Planning Board Agenda – Item 4. Available from: <https://montgomeryplanningboard.org/agenda-item/june-25-2020/>

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Rust Sanctuary | 802 Childrens Center Road, Leesburg, Virginia 20175 | 703-669-0000

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be a priority. Trees provide shade which mitigate urban heat island effects, serve as home to wildlife, and their roots prevent soil erosion.

- Although we recognize that at this time the Forest Conservation regulations, and not the Forest Conservation Law, are under revision, we would like to provide the following suggested changes to the county's Forest Conservation Law. Under item "k" of the "Exceptions"<sup>3</sup> the law specifies that "any lot covered by a preliminary plan of subdivision or site plan that did not receive a sediment control permit before July 1, 1991, and for which the preliminary plan of subdivision or site plan," could be exempt from submitting a forest conservation plan. Furthermore, provision (k)(1) states that the exception still applies if the lot "was approved before July 1, 1984 and has less than 40,000 square feet of forest cover." We therefore proposed that lots with subdivision plans not be exempt from submitting a forest conservation plan, but instead are required to submit one.
- We would like to see more resources allocated to staff to enforce the Forest Conservation Law and regulations on the field.
- We would like to see an increase rate to the Forest Conservation Fund to fund reforestation projects in the county. Currently, the county's fee in lieu is \$1.25 per square foot,<sup>4</sup> which is higher than state's fee in lieu of \$0.30 cents per square foot for projects inside the priority area, and \$0.36 cents per square foot for projects outside the priority funding area.<sup>5</sup>

### **Specific Recommendations and Comments for the Newly Amended Regulations**

- We would like to advocate for reforestation and mitigation to be tied into the location of the existing watershed of the trees. Under subsection 22A-12 (e)(4) of the Forest Conservation Law, reforestation or afforestation projects must occur within the county and the watershed or either option.<sup>6</sup> However, the proposed amended Forest Conservation regulations do not mention ensuring that reforestation occurs within the same watershed or county.

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<sup>3</sup> Chapter 22 A. Forest Conservation – Trees. Montgomery Planning (2019). Exceptions (k) - Page 9. Available from: <https://montgomeryplanning.org/wp-content/uploads/2017/10/Chapter-22A-effective-October-2018.pdf>

<sup>4</sup> Montgomery County Forest Conservation Law - Fee in Lieu price. Available from: <https://montgomeryplanning.org/planning/environment/forest-conservation-and-trees/forest-conservation-fund/>

<sup>5</sup> Maryland Code, Natural Resources § 5-1610 (c) (1) (i) (ii) – MD Forest Conservation Law. Available from: <https://codes.findlaw.com/md/natural-resources/md-code-nat-res-sect-5-1610.html>

<sup>6</sup> Chapter 22 A. Forest Conservation – Trees. Montgomery Planning (2019). Retention, afforestation, and reforestation requirements (e)(4) - Page 22. Available from: <https://montgomeryplanning.org/wp-content/uploads/2017/10/Chapter-22A-effective-October-2018.pdf>

- We would like to see more provisions in the proposed amended regulations that create incentives that protect and preserve forests, and that seek to leave forested lands on easements.
- We agree with the Planning staff recommendation listed under “Priorities of Retention” that highlights the importance of protecting not only champion trees, but also the biodiversity of trees, shrubs, and plants under subsection 22A.00.01.07 (A)(3).<sup>7</sup>
- We agree with the Planning staff recommendation to increase the tree maintenance time from 2 to 5 years. The additional time will assure that the trees will be better protected and maintained for a longer period of time and to assure their livelihood.<sup>8</sup>

We thank the Department of Planning for taking in consideration our comments and look forward to continuing to be engaged and be part of the Forest Conservation regulation and law changes.

Sincerely,

Denisse Guitarra  
MD Conservation Advocate  
Audubon Naturalist Society

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<sup>7</sup> Forest Conservation – Trees Regulations. Section 22A.00.01.07 Priorities for Retention. Page 12. Available from: [https://montgomeryplanningboard.org/wp-content/uploads/2020/05/Chapter-22A.-Forest-Conservation-Trees-Regulations\\_Proposed-Changes-2018\\_2020\\_Attachment-B.pdf](https://montgomeryplanningboard.org/wp-content/uploads/2020/05/Chapter-22A.-Forest-Conservation-Trees-Regulations_Proposed-Changes-2018_2020_Attachment-B.pdf)

<sup>8</sup> Forest Conservation – Trees Regulations. Section 22A.00.01.14 Forest Conservation Maintenance and Management Agreements. Page 26. Available from: [https://montgomeryplanningboard.org/wp-content/uploads/2020/05/Chapter-22A.-Forest-Conservation-Trees-Regulations\\_Proposed-Changes-2018\\_2020\\_Attachment-B.pdf](https://montgomeryplanningboard.org/wp-content/uploads/2020/05/Chapter-22A.-Forest-Conservation-Trees-Regulations_Proposed-Changes-2018_2020_Attachment-B.pdf)

**From:** [Jeanne Braha](#)  
**To:** [MCP-Chair](#)  
**Cc:** [Eliza Cava](#); [Denisse Guitarra](#)  
**Subject:** Re: Stormwater Partners Network Comments on Forest Conservation  
**Date:** Tuesday, June 23, 2020 3:58:54 PM  
**Attachments:** [2020 06 FCL SWPN letter.pdf](#)

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Please see attached for an updated letter that includes one more sign-on - this is a popular issue among Stormwater Partners! We appreciate your taking this a second time!

Thanks,  
Jeanne and Eliza

On Mon, Jun 22, 2020 at 8:02 PM Jeanne Braha <[jbraha@rockcreekconservancy.org](mailto:jbraha@rockcreekconservancy.org)> wrote:  
Chair Anderson and Planning Board Members,

Please see attached support from the Stormwater Partners Network for the proposed changes to the Forest Conservation Regulations. We appreciate your consideration of these views and would be happy to discuss if you have any questions.

Best,  
Jeanne Braha and Eliza Cava, Co-Chairs  
Stormwater Partners Network

--

**Jeanne Braha**  
**Executive Director**  
**Rock Creek Conservancy**  
7200 Wisconsin Avenue, Suite 500, Bethesda, MD 20814  
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# STORMWATER PARTNERS NETWORK OF MONTGOMERY COUNTY



June 22, 2020

Montgomery County Planning Board

Dear Chair Anderson and Planning Board Members:

We, the Stormwater Partners Network (SPN) of Montgomery County,<sup>1</sup> submit these comments to the Montgomery County Council in support of the changes to the Montgomery County Regulation Number COMCOR No, 22A.00.01, Forest Conservation – Trees, submitted by the Montgomery County Planning Board. The proposed changes offer a positive step forward for forest conservation -- yet will not reach the important goal of no net loss of forest cover in Montgomery County. Simply put, it is easier to conserve forest cover than to replace or restore it.

The regulations contain administrative requirements related to the review and processing of Natural Resource Inventories, Forest Stand Delineations, Exemptions from Submitting a Forest Conservation Plan, and Forest Conservation Plans. The retention of Montgomery County's tree cover is one of the most cost-effective ways to reduce stormwater pollution: urban tree canopies capture rainfall in their crowns, reduce urban heat island effects, delay runoff to impervious surfaces, and increase the infiltration capacity of soils.

Broadly, SPN would like to see as many trees and forest patches retained as possible as the county continues to develop, avoiding the need for replacement, as well as rigorous maintenance of newly planted trees and robust inspection. In addition to avoiding costs for the county, maintaining existing forests provides the enhanced benefits of more mature forests for both water quality and climate mitigation.

In addition, SPN would like to see Montgomery County follow the lead of other Maryland counties such as Anne Arundel by adopting a policy of no net loss of forest cover.

Until no net loss becomes the overarching policy, SPN is pleased to offer general support for the proposed regulations, which offer several important benefits to forest conservation in Montgomery County:

- The period of time during which a developer is required to maintain newly planted trees is extended from two to five years, providing a significantly higher chance that the trees will survive.

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<sup>1</sup> The Stormwater Partners Network is composed of organizations and individuals who support more effective stormwater policies and management in Montgomery County, MD, with the goal of clean and healthy streams throughout the county. We have worked collaboratively with county and state agencies and legislators to modify existing policies and practices so that they foster water infiltration rather than runoff. A full list of our current membership can be found on our website, [www.stormwaterpartnersmoco.net](http://www.stormwaterpartnersmoco.net).

# STORMWATER PARTNERS NETWORK OF MONTGOMERY COUNTY



- The fee in lieu set for Montgomery County (\$1.25 per square foot) is higher than the state's minimum of \$0.30 per square foot, reflecting the higher cost of land in Montgomery County than across the state generally, and further incentivizing proper forest conservation on site.
- The planned closure of a loophole that would otherwise continue to allow a developer to continue to submit separate sediment control permits for adjacent sites, thereby appearing to be below the 40,000 square foot lot size requirement.

The new regulations will allow Montgomery County to make significant progress on forest conservation efforts. Stormwater Partners Network encourages the County Council to fully fund all necessary enforcement staff to ensure that the permit review and inspections processes referenced in the regulations are able to be carried out fully.

If you have questions or comments about our position or concerns, please contact Jeanne Braha ([jbaha@rockcreekconservancy.org](mailto:jbaha@rockcreekconservancy.org)) or Eliza Cava ([eliza.cava@anshome.org](mailto:eliza.cava@anshome.org)), co-chairs of Stormwater Partners Network.

Sincerely,

Organizational and individual members of Stormwater Partners Network:

Jim Foster  
President  
**Anacostia Watershed Society**

Denisse Guitarra  
MD Conservation Advocate  
**Audubon Naturalist Society**

Emily Ranson  
Maryland Director  
**Clean Water Action**

Ginny Barnes  
Vice Chair  
**Conservation Montgomery**

Nanci Wilkinson  
Chair  
**Environmental Justice Ministry Cedar Lane  
Unitarian Universalist Church**

David Dunmire  
Board of Directors  
**Eyes of Paint Branch**

Jodi Rose  
Executive Director  
**Interfaith Partners for the Chesapeake**

Karen Cordry  
President  
**Kensington Heights Civic Association**

Ben Alexandro  
Water Program Director  
**Maryland League of Conservation Voters**

Linda Silversmith  
Chair of Environmental committee  
**League of Women Voters of Montgomery  
County**

Frederick Tutman  
Riverkeeper & CEO  
**Patuxent Riverkeeper**

Emmalee Aman  
Policy Director

# STORMWATER PARTNERS NETWORK OF MONTGOMERY COUNTY



## **Potomac Conservancy**

Jeanne Braha  
Executive Director

## **Rock Creek Conservancy**

Diana E Conway  
President

## **Safe Healthy Playing Fields Inc.**

Deborah Sarabia  
President

## **Seneca Creek Watershed Partners**

Shruti Bhatnagar, Chair  
Sylvia S Tognetti, Water Lead

## **Sierra Club Montgomery County**

Annita Seckinger  
Executive Director

## **Watts Branch Watershed Alliance**

Ken Bawer  
President-elect

## **West Montgomery County Citizens Association**

## **Individuals**

Karen Metchis

William McCrady

Danila Sheveiko