



MONTGOMERY COUNTY PLANNING DEPARTMENT

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

MCPB
Item No. 10
Date:
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Administrative Regulations for Chapter 22A, Forest Conservation and Trees Work Session



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SUMMARY

On May 21, 2020, Montgomery Planning staff presented to the Planning Board proposed changes to the Administrative Regulations for Chapter 22A, Forest Conservation and Trees (COMCOR No. 22A.00.01). On June 25, 2020 a public hearing was held in which the public, environmental organizations, and regulated community were provided an opportunity to comment on the proposed changes to these regulations. Three sets of comments were received from the Maryland Building Industry Association, Stormwater Partners Network of Montgomery County, and Audubon Naturalist Society.

Each of the comments received at the public hearing are detailed below. A response from staff is also provided to each comment. If further changes are proposed by staff in response to comments received, those changes are identified below with a double underline or ~~double strikethrough~~.

Comments from Maryland Building Industry Association

Comment #1a: 22A.00.01.03 Definitions – Proposed Definition 17, “Environmental Buffer”

- 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.”

The language proposed by staff on May 21, 2020 is below:

- 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.

Staff Response: Staff reviewed this comment and confirms that there is no other reason for creating this new definition. However, page four of Attachment B to the *Guidelines for the Environmental Management of Development in Montgomery County, Maryland* (MNCPPC) clarifies that “Under these Guidelines, protected ephemeral streams are those in the Ten Mile Creek watershed within the Ten Mile Creek Master Plan area that touch or overlap with environmental buffers associated with other downstream hydrologic features...” Therefore, staff proposes to modify the language of definition 17 as follows:

- 17) “Environmental buffer” means perennial, intermittent, or ephemeral streams/channels and their associated buffers, when such streams are required to have buffers as recommended in an applicable Master Plan or the latest version of *Guidelines for the Environmental Management of Development in Montgomery County, Maryland* (MNCPPC); wetlands and their associated buffers; floodplains; 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.

Comment #1b: 22A.00.01.03 Definitions – Proposed Definition 34, “Landscaping Credit”

- i. *Please add “or cultivars of native plants” to be consistent with the revisions that were made to the forest conservation law in 2018.*

The language proposed by staff on May 21, 2020 is below:

- 33) “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 the dimensions and details for tree planting and landscaping areas. Any planting for landscaping credit to meet the forest conservation plan requirements must use native plants.

Staff Response: Staff agrees with this comment and proposes to modify the language of definition 33 as follows:

33) “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 the dimensions and details for tree planting and landscaping areas. Any planting for landscaping credit to meet the forest conservation plan requirements must use native plants or cultivars of native plants.

Comment #1c: 22A.00.01.03 Definitions – Proposed Definition 45, “Priority Planting Area”

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.

The language proposed by staff on May 21, 2020 is below:

23) “Priority planting area” means areas in which planting must occur unless those areas are not present.

Staff Response: Staff reviewed this comment and does not believe this change is needed to the definition of “priority planting area” in the Forest Conservation Regulations. This proposed definition does not mean the entire priority planting area must be planted. The change that was made to the Forest Conservation Law in 2018 details how forest planting requirements are determined and those detailed requirements would take precedent over the Forest Conservation Regulations. Therefore, staff does not believe this change is needed in the Forest Conservation Regulations specifically.

Comment #1d: 22A.00.01.03 Definitions – Proposed Definition 51, “Specimen Tree”

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**

The language currently in the Forest Conservation Regulations is below (staff did not propose changes to this definition on May 21, 2020):

51) "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.

Staff Response: The section referred to in this comment defines trees which must be left in an undisturbed condition, consistent with Section 22A-12(3)(b) and 22A-12(3)(c) of the Forest Conservation Law. "Specimen Tree" is defined by the Trees Technical Manual; it is the same definition that appears in the Forest Conservation Regulations (the same as definition #51, above). Staff believes it is important that this definition remain as is because a specimen tree may not be 30 inches or greater depending on the tree species. The Trees Technical Manual appendices further define specimen trees based on their size and species.

Comment #2a: 22A.00.01.05 Application – (A)(7)

- 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.*

The language proposed by staff on May 21, 2020 is below:

- 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 or regulated activities:

- (7) 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.

Staff Response: The intention with this proposed change is to ensure that plans covering two or more platted contiguous lots that collectively total 40,000 square feet or larger are subject to the Forest Conservation Law even when individual lot owners apply separately for sediment control permits but the sediment control for those lots is managed as if it were one project. This is currently a loophole in the Forest Conservation Law. To address this comment, staff proposes to modify the language of 22A.00.01.05(A)(7) as follows:

- B. 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 or regulated activities:

- (8) clearing or grading conducted on two or more platted contiguous lots that are part of the same project, 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.

Comment #2b: 22A.00.01.05 Application – (B)(3)(a)

- i. Please define “protected habitats” to clarify that these are known publicly documented habitats for rare, threatened or endangered species or habitats identified during the preparation of an approved natural resources inventory.*

The language proposed by staff on May 21, 2020 is below:

(3) Preparation by a qualified professional, of forest conservation plan to be approved by Planning Board or Planning Director. As applicable, which includes:

- (a) 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;
- (b) areas of existing forest, areas of forest to be removed, and areas of forest to be retained;

Staff Response: Staff suggests changing “protected habitats” to “critical habitats,” which are already defined in the Forest Conservation Regulations. This term is also more accurate. Therefore, staff proposes to modify the language of Section 22A.00.01.05(B)(3)(a) as follows:

(3) Preparation by a qualified professional, of forest conservation plan to be approved by Planning Board or Planning Director. As applicable, which includes:

- (a) lot lines, building, and proposed infrastructure, located to maximize retention areas and avoid environmentally sensitive areas such as environmental buffers and ~~protected~~ critical habitats wherever practical;
- (b) areas of existing forest, areas of forest to be removed, and areas of forest to be retained;

Comment #3a: 22A.00.01.06 Natural Resource Inventory and Forest Stand Delineation (NRI/FSD) Requirements – (B)(3)(a)

- 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.*

The language proposed by staff on May 21, 2020 is below:

A. A Natural Resource Inventory (NRI) application must be considered complete if it contains a complete analysis of existing natural resources and man-made features on a property which is verified by field survey and contains the following information to cover the development site and first 100 feet of adjoining land around the perimeter or the width of adjoining properties, whichever is less:

- (5) 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;

Staff Response: Staff has reviewed this comment and does not believe this change is needed as page four of Attachment B to the *Guidelines for the Environmental Management of Development in Montgomery County, Maryland* (MNCPPC) clarifies that “Under these Guidelines, protected ephemeral streams are those in the Ten Mile Creek watershed within the Ten Mile Creek Master Plan area that touch or overlap with environmental buffers associated with other downstream hydrologic features...”

Comment #3b: 22A.00.01.06 Natural Resource Inventory and Forest Stand Delineation (NRI/FSD) Requirements – (A)(12)

- 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*

The language proposed by staff on May 21, 2020 is below:

- A. A Natural Resource Inventory (NRI) application must be considered complete if it contains a complete analysis of existing natural resources and man-made features on a property which is verified by field survey and contains the following information to cover the development site and first 100 feet of adjoining land around the perimeter or the width of adjoining properties, whichever is less:

(12) Trees that are specimens for their species;

Staff Response: The section referred to in this comment defines trees which must be left in an undisturbed condition, consistent with Section 22A-12(3)(b) and 22A-12(3)(c) of the Forest Conservation Law. “Specimen Tree” is defined by the Trees Technical Manual; it is the same definition that appears in the Forest Conservation Regulations (the same as definition #51, above). The Trees Technical Manual appendices further define specimen trees based on their species. Staff does not believe this proposed change is subjective, but proposes to modify the language of Section 22A.00.01.06 (A)(12) for clarification as follows:

- A. A Natural Resource Inventory (NRI) application must be considered complete if it contains a complete analysis of existing natural resources and man-made features on a property which is verified by field survey and contains the following information to cover the development site and first 100 feet of adjoining land around the perimeter or the width of adjoining properties, whichever is less:

(12) Specimen Trees; ~~Trees that are specimens for their species;~~

Comment #4a: 22A.00.01.07 Priorities for Retention– (A)(3)

- i. Please identify that this is the State of Maryland list of Rare, Threatened or Endangered Species.*

The language proposed by staff on May 21, 2020 is below:

- A. The following areas are considered the highest priority retention areas for 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:
 - (3) trees, shrubs, or plants identified on the list of rare, threatened, or endangered species;

Staff Response: Staff agrees with this comment and proposed change. Therefore, staff proposes to modify the language of Section 22A.00.01.07 (A)(3) as follows:

- A. The following areas are considered the highest priority retention areas for 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:
 - (3) trees, shrubs, or plants identified on the Maryland Department of Natural Resources list of rare, threatened, ~~or~~ and endangered species;

Comment #5a: 22A.00.01.08 General Forest Conservation Plan Provisions – (A)

- 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.”*

The language proposed by staff on May 21, 2020 is below:

- A. 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 forested sites which, at a minimum, should be preserved. Applicants should strive to maximize forest retention whenever practical.

Staff Response: The term “forest retention” is purposefully general here; the specific areas of forest that must be retained whenever practical are specified in the Forest Conservation Law and include

contiguous forest and other forested areas, in addition to high priority forest stands. Therefore, staff does not propose further modifications to this section.

Comment #5b: 222A.00.01.08 General Forest Conservation Plan Provisions – (E)(2)(b)

- 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.*

The language proposed by staff on May 21, 2020 is below:

B. Afforestation and Reforestation

- (1) The following must be considered as highest priority planting areas for forest conservation plans with required afforestation and reforestation:
 - (b) 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)*.

Staff Response: Staff has reviewed this comment and does not believe this change is needed as page four of Attachment B to the *Guidelines for the Environmental Management of Development in Montgomery County, Maryland (MNCPPC)* clarifies that “Under these Guidelines, protected ephemeral streams are those in the Ten Mile Creek watershed within the Ten Mile Creek Master Plan area that touch or overlap with environmental buffers associated with other downstream hydrologic features...”

Comment #5c: 222A.00.01.08 General Forest Conservation Plan Provisions – (E)(3)(c)

- i) *Please revise to allow minimal deer browse as trees can survive with minimal deer browse.*

The language proposed by staff on May 21, 2020 is below:

- (4) Surviving tree must be at least 1” caliper to receive full credit toward survival requirements. Reinforcement planting must be 1” trees. All trees to be accepted must be healthy and have the main leader intact with no deer browse.
- (5) Surviving tree must be at least 2” caliper to receive full credit toward survival requirements. Reinforcement planting must be 2” trees. All trees to be accepted must be healthy and have the main leader intact with no deer browse.

Staff Response: Staff agrees with this comment and proposes to modify the language of Section 222A.00.01.08(E)(3)(c) as follows:

- (4) Surviving tree must be at least 1” caliper to receive full credit toward survival requirements. Reinforcement planting must be 1” trees. All trees to be accepted must be healthy and have the main leader intact with minimal ~~no~~ deer browse.
- (5) Surviving tree must be at least 2” caliper to receive full credit toward survival requirements. Reinforcement planting must be 2” trees. All trees to be accepted must be healthy and have the main leader intact with minimal ~~no~~ deer browse.

Comment #5d: 22A.00.01.08 General Forest Conservation Plan Provisions – (F)(4)

- 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.*

The language proposed by staff on May 21, 2020 is below:

- F. Tree Save Plans.
(4) 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.

Staff Response: Staff has reviewed this comment and in order to specify tree size and impact, staff proposes to modify the language of Section 22A.00.01.08(F)(4) as follows:

- F. Tree Save Plans.
(4) The tree save plans must show on-site or off-site trees 6” or greater located along the limits of disturbance if the proposed activity would impact the critical root zone of those trees, and must identify methods to preserve and protect on-site or off-site trees along the limits of disturbance regardless of tree size those trees.

Comment #6a: 22A.00.01.09 Forest Conservation Plan Requirements – (B)(2)(g)(vi)

- i) *Please revise as discussed during the 2018 revision to be required only when saving trees with greater than 30% critical root zone impacts.*

The language proposed by staff on May 21, 2020 is below:

- (2) In addition to the items listed in subsection A(2)(a-c), (f), (g) and (h) a final forest conservation plan must include:
(g) a protection plan which shows:
vi. 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; and

Staff Response: Staff agrees with this comment and proposes to modify the language of Section 22A.00.01.09(B)(2)(g)(vii) as follows:

- (2) In addition to the items listed in subsection A(2)(a-c), (f), (g) and (h) a final forest conservation plan must include:
(g) a protection plan which shows:
vi. an arborist report that shows the methods to be utilized to protect any tree, 24” dbh and greater, when 30% or more of the critical root zone is impacted; and

Comment #6b: 22A.00.01.09 Forest Conservation Plan Requirements – (B)(2)(g)(vii)

i) Please clarify under what circumstances this would apply.

The language proposed by staff on May 21, 2020 is below:

(2) In addition to the items listed in subsection A(2)(a-c), (f), (g) and (h) a final forest conservation plan must include:

(g) a protection plan which shows:

vii. 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.

Staff Response: This would apply when Planning staff reviewing the final forest conservation plan needs more information about a tree less than 24" DBH in order to complete their review. Staff proposes to modify the language of Section 22A.00.01.09(B)(2)(g)(viii) for consistency with the above change:

(2) In addition to the items listed in subsection A(2)(a-c), (f), (g) and (h) a final forest conservation plan must include:

(g) a protection plan which shows:

vii. An arborist report may be required, on a case-by-case basis, for trees less than 24" dbh, when 30% or more of the critical root zone is impacted.

Comment #6c: 22A.00.01.09 Forest Conservation Plan Requirements – (C)

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.

The language proposed by staff on May 21, 2020 is below:

C. Noticing Requirements for Forest Conservation Plans. Applicants that require approval of a forest conservation plan must follow the noticing requirements identified in Chapter 50/59.00.01.04.

Staff Response: Forest conservation exemptions do not require approval of a Forest Conservation Plan. Therefore, this proposed addition does not apply to forest conservation exemptions. Only standalone Forest Conservation Plans must follow new noticing requirements; this will be made clear when Chapter 50/59.00.01.04 is amended. In the meantime, once the proposed changes to the Forest Conservation Law and Regulation are approved by the Montgomery County Council, the staff memo attachment that was reviewed during the presentation to the Planning Board on the proposed changes to the Forest Conservation Law on February 7, 2020, will outline these new noticing requirements for Planning staff. This staff memo also states "Recent amendments to the Montgomery County Forest Conservation Law include a new notification requirement for forest conservation plans not associated with development applications such as site plans and subdivisions."

Comments from Stormwater Partners Network (SPN) of Montgomery County

1. 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.

Staff Response: Chapter 22A of the County code identifies priority areas to be protected and a forest conservation plan shows the amount of forest retained, cleared and planted. Staff is conscientious of trees being retained and removed and does not want to leave standing trees that are comprised by the development process. It is best to remove trees that are currently hazardous, or comprised by the development activity, and plant new trees that will eventually replace the lost canopy. Amendments to the forest conservation law were previously forwarded to the County Council for introduction. In those amendments the Planning Board agreed to extend the maintenance and management period for planted forest from 2 years and 5 years and incorporated the need to control non-native and invasive plants during the maintenance and management period. Staff is not proposing a change to the forest conservation regulation in response to this comment.

2. 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.

Staff Response: Staff has no comment.

Comments (Specific to the Forest Conservation Regulations) from Audubon Naturalist Society:

1. 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. However, the proposed amended Forest Conservation regulations do not mention ensuring that reforestation occurs within the same watershed or county.

Staff Response: Planning staff ensure reforestation and afforestation occur within the same watershed or county as the development. This requirement is codified in the Forest Conservation Law under 22A-12(e)(4), as mentioned in the comment above, and staff believes this does not need to be reiterated in the Forest Conservation Regulations.

2. 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.

Staff Response: All forests that are retained and planted to meet requirements of the Forest Conservation Law are placed under Category I Forest Conservation, which are perpetual. Permanent protection of individual trees on private property was used during the infancy of the forest conservation program. Staff found that giving forest conservation retention credit for individual trees that are not part of a naturally regenerating forest was not fulfilling the long-term objectives of individual forest conservation plans of increasing the overall forest and tree canopy. Individual trees are living organisms and when they die the easements remained on open areas such as lawn for there is no requirement for the property owner to replace an individual tree. Whereas, in a forest this is not a problem because of natural regeneration. Staff is not proposing a change to the forest conservation regulation in response to this comment.

3. 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).7

Staff Response: Staff has no comment.

4. 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.8

Staff Response: Staff has no comment.

Conclusion

That completes staff response to the comments received from the regulated community and the public for the Forest Conservation Regulation COMCOR No. 22.00.01. Staff recommends that the Planning Board approve staff’s proposed changes to the Forest Conservation Regulation and transmit to the Montgomery County Council for introduction.

Appendices

- A. Comments received from Maryland Building Industry Association
- B. Comments received from Stormwater Partners Network of Montgomery County
- C. Comments received from Audubon Naturalist Society
- D. May 21, 2020 Staff Report to the Montgomery County Planning Board
- E. Chapter 22A. Forest Conservation Trees Regulations_Proposed Changes 2018_2020_Attachment A (clean copy)
- F. Chapter 22A. Forest Conservation Trees Regulations_Proposed Changes 2018_2020_Attachment B (mark-up of 2001 regulation)