

Item 10 - Correspondence

From: [Denisse Guitarra](#)
To: [MCP-Chair](#)
Cc: [Eliza Cava](#); jbraha@rockcreekconservancy.org; [Taddei, Kristin](#)
Subject: STORMWATER PARTNERS NETWORK OF MONTGOMERY COUNTY letter on Item 10 -Forest Conservation Regulation Amendments
Date: Wednesday, July 15, 2020 11:54:05 AM
Attachments: [image001.png](#)
[2020-07- SWPN Letter - Forest Conservation Regulations and Ephemeral Streams Final.pdf](#)

Dear Montgomery County Planning Board,

Please find attached in this email a letter by Stormwater Partners Network ahead of tomorrow's Planning work session on the Forest Conservation Regulation Amendment (Item 10) . If you have any questions, please do not hesitate to contact us.

Thank you,
Denisse Guitarra



Denisse Guitarra
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STORMWATER PARTNERS NETWORK OF MONTGOMERY COUNTY



July 15, 2020

Montgomery County Planning Board

Dear Chair Anderson and Planning Board Members:

We, the Stormwater Partners Network (SWPN) of Montgomery County,¹ submitted a written testimony ahead of the June 25, 2020 Forest Conservation Regulation Amendment hearing and would like to submit additional comments as a response to the testimony provided by the Maryland Building Industry Association during the public hearing.²

We support the Planning Staff proposed changes to the Montgomery County Regulation Number COMCOR No, 22A.00.01, Forest Conservation – Trees, Regulations submitted by the Planning Staff to the Montgomery County Planning Board including the current ephemeral channel/streams and buffers definition. We are very concerned, however, that the Association’s proposal, asking the Planning Board to explicitly limit these definitions to ephemeral channels/streams and buffers only the Ten Mile Creek watershed, is unnecessary in this instance, premature, and would set back a good-faith discussion on how best to protect our essential ephemeral streams, no matter where they occur. Instead, we ask that the ephemeral stream provisions slated to be applied to Ten Mile Creek move ahead as planned and that staff and the Planning Board make no effort to preclude applying the definitions and protections to any other ephemeral channels/streams and buffers in Montgomery County, now or in the future. Specifically, we ask the Planning Board to keep the staff’s recommended definitions for Ephemeral Channel Buffers in the “Environmental buffers,”³ and the Natural Resource Inventory and Forest Standard Delineation (NRI/FSD) requirements⁴ section. As with our original testimony, simply stated, it is easier to conserve forest cover and our waterways than to replace or restore them.

If you have questions or comments about our position or concerns, please contact Jeanne Braha (jbaha@rockcreekconservancy.org) and Eliza Cava (eliza.cava@anshome.org), co-chairs of Stormwater Partners Network, or Denisse Guitarra (denisse.guitarra@anshome.org), MD Conservation Advocate at ANS.

¹ 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.

² Forest Conservation Public Hearing June 25, 2020 – Additional Correspondence - Available from: <https://montgomeryplanningboard.org/wp-content/uploads/2020/06/Item-4-Correspondence-Staff-Draft-of-Amended-Administrative-Regulations-for-Chapter-22A-Forest-Conservation-Public-Hearing.pdf>

³ Attachment A: Forest Conservation – Trees, Regulations Proposed Changes – Section 22A.00.01.03 - Definitions – 17-Environmental Buffers. Available from: https://montgomeryplanningboard.org/wp-content/uploads/2020/06/AttachmentA_Chapter-22A.-Forest-Conservation-Trees-Regulations_Proposed-Changes-2018_2020_Attachment-A.pdf

⁴ Attachment A: Forest Conservation – Trees, Regulations Proposed Changes – Section 22A.00.01.06 - Natural Resource Inventory and Forest Standard Delineation (NRI/FSD) requirements – section 5. Available from: https://montgomeryplanningboard.org/wp-content/uploads/2020/06/AttachmentA_Chapter-22A.-Forest-Conservation-Trees-Regulations_Proposed-Changes-2018_2020_Attachment-A.pdf

STORMWATER PARTNERS NETWORK OF MONTGOMERY COUNTY



Sincerely,

Organizational and individual members of Stormwater Partners Network:

Denisse Guitarra
MD Conservation Advocate
Audubon Naturalist Society

Deborah Sarabia
President
Seneca Creek Watershed Partners

Emily Ranson
Maryland Director
Clean Water Action

Jeanne Braha
Executive Director
Rock Creek Conservancy

Ginny Barnes
Vice-Chair
Conservation Montgomery

Diane Cameron
Director
TAME Coalition
(Transit Alternatives to Mid-County
Highway Extended)

David Dunmire
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Individuals:
Peggy Dennis
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Dr. Willo Pequegnat
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