

To: Charles County Commissioners, Reuben B. Collins II, Esq., President
- September 18, 2022

RE: Amendments to Chapter 298 – Forest Conservation Ordinance

I appreciate the opportunity to comment on the proposed amendments to Charles County's Forest Conservation Ordinance (FCO).

I am concerned that the proposed amendments to Charles County's FCO do not provide sufficient safeguards to conserve our valuable forests. I urge the Planning Commission to make our FCO consistent with the strong natural resource protections in the county's Comprehensive Plan. Charles County citizens and elected officials worked for years to adopt a robust comprehensive plan to invest in existing communities and protect our critically important forests.

I have lived in Charles County, Maryland for over 40 years and value our forests and the ecosystem services (clean air, clean water, carbon capture, recreational opportunities) provided to those of us who live in Charles County. A study conducted in 2017 by the Maryland Department of Natural Resources (DNR) stated: "the economic value of ecosystem services in Charles County is significant, totaling \$577 million each year" ⁱ. Those ecosystem services are provided to a large extent by our valuable forests. A forest lost to development is a forest lost forever - along with the valuable ecosystem services it provides our citizens.

The main goal of amending the FCO should be to protect our forested resources by adopting a No-Net-Loss of Forest Policy for Charles County. The Sustainable Forestry Council has provided a set of draft recommendations to Maryland DNR on how to achieve a No-Net-Loss of Forest Policy. A key recommendation is that forest loss "should be mitigated with a one to one ratio"ⁱⁱ. Our FCO should require that one acre of forest removed be replaced with one acre of replanted trees of the same quality and species diversity of those removed.

Contiguous forests are critical to maintaining wildlife habitat and biodiversity. Priority Forest Retention Area maps must include corridors that connect priority forested areas. To achieve that, the FCO should amend the Priority Forest Retention Area Map to include all Tier 4 areas as adopted in the Comprehensive Plan.

We need to drastically improve our ability to protect our valuable forests. I urge our County Commissioners to amend the FCO to include a 1-1 reforestation ratio for our Priority Forest Retention Areas. In addition, I urge the Planning Commission to increase protection for contiguous and connected priority forests by requiring a variance to clear these valuable natural resource areas.

Please do not adopt the weaker regulations proposed in the draft amendments to Charles County's Forest Conservation Plan. Instead, I ask the Planning Commission to please protect our valuable local forests by strengthening our forest protections as suggested in these comments.

ⁱ (DNR 14-392017 -651
[https://dnr.maryland.gov/ccs/Documents/Charles Co Ecosystem Service Report Final.pdf](https://dnr.maryland.gov/ccs/Documents/Charles_Co_Ecosystem_Service_Report_Final.pdf))

ⁱⁱ https://dnr.maryland.gov/forests/Documents/sfc/SFC_NNL_110811.pdf

Respectfully,

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