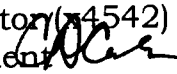


September 6, 2001

**Memorandum**

TO: Montgomery County Planning Board

FROM: Cathy Conlon, Forest Conservation Program Administrator (x4542)  
for the Montgomery County Park and Planning Department 

SUBJECT: Amendment to the Approved Forest Conservation Plan for  
Montgomery Blair High School

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**Recommendation**

Staff recommends approval of a revision to the Forest Conservation Plan (FCP) for Montgomery Blair High School to allow purchase of reforestation credits from an offsite reforestation "bank" instead of the offsite reforestation planting specified in the plan.

**Overview**

The Montgomery Blair High School Forest Conservation Plan was approved by the Planning Board in January, 1996 as part of the mandatory referral review. The Blair site consisted of 42.6 acres of land in Four Corners covered by 37 acres of upland forest. Due to the extensive educational and recreational facilities planned for the property, it was not possible to retain any of the existing forest or provide onsite area for reforestation to meet forest conservation law requirements. The plan was therefore approved with the condition that the required reforestation (23.3 acres) be provided offsite.

The priority for offsite reforestation is to use a site in the same watershed where forest is cleared. An extensive analysis of offsite properties was conducted in the Sligo Creek watershed where the Blair site is located and in Northwest Branch which is the next closest watershed. When no appropriate sites were identified in either watershed, Montgomery County Public Schools (MCPS) requested approval to reforest land owned by the Washington Suburban Sanitary Commission (WSSC) located along the Triadelphia and

Rocky Gorge reservoirs within the Patuxent River watershed. The Patuxent is identified as a priority for protection and reforestation to reduce nonpoint source pollutants and protect the water supply reservoirs.

During the original Planning Board hearing, several individuals from the local neighborhood testified regarding loss of onsite forest and their desire to get replacement as close as possible to the school site. After deliberation of the issue, the Planning Board supported staff's recommendation to use the Patuxent site given the unavailability of closer sites and the benefits of doing the planting in larger contiguous areas rather than small forest patches. An offsite reforestation planting plan for the Patuxent site containing 23.3 acres for Blair and 5.95 acres to meet requirements for two other MCPS projects was approved in July, 1996, but not implemented.

In the attached July 23, 2001 letter, MCPS now requests that they be allowed to forego planting forest on the Patuxent site in lieu of buying reforestation credits from a reforestation "bank" site in the Potomac River.

## **Discussion**

MCPS bases their request to modify the offsite planting requirements of the Blair plan on two arguments. The first is that buying credits from this "bank" is less expensive than planting. The cost of bank credits is market driven and site specific, so it's certainly possible that this bank is cheaper than planting. However, it would be more accurate to compare costs in this instance between the requirements of the Blair plan versus the bank, rather than the comparison provided. MCPS compares an offsite planting plan approved for the County Department of Public Works and Transportation (DPW&T). The requirements of the DPW&T plan are not the same as those of the Blair plan. Among other things, DPW&T is using larger planting stock. Also, the bank being compared used natural regeneration as a reforestation technique instead of planting trees which could affect the costs they charge. In general, staff has found reforestation costs between banks and other offsite reforestation projects to be comparable.

The second MCPS argument for buying credits is avoidance of the maintenance responsibility for the planted trees, especially for the extra year specified by the terms for using WSSC land. It is true that maintenance can be difficult on some sites, and banking transfers the responsibility to the banker. Staff agrees that maintenance of other MCPS planting projects up to this point has been a struggle. However, it is staff's opinion that this is the result of using marginal planting sites on school properties (previously graded and compacted soils) and seedling planting stock. The Patuxent site is a much better location for reforestation than most of the onsite school projects have been.

From a forest conservation program standpoint, staff does not believe there is an advantage in using reforestation credits at the Mason Island reforestation bank over getting reforestation planting at the Patuxent reservoir site. However, the Mason Island site is also a high priority location for forest (floodplain) and staff acknowledges that any cost savings for a project using public funds are desirable. Therefore, staff recommends approval of the revision to the Blair forest conservation plan to allow purchase of reforestation bank credits instead of offsite reforestation planting. Staff has requested that MCPS offer the Patuxent site to DPW&T for their use in meeting additional reforestation requirements that they have. If DPW&T is not interested, staff would like to retain rights to the site from WSSC for planting trees with monies from the forest conservation fund.

CAC:cc

Attachment



850 Hungerford Drive \* Rockville, Maryland \* 20850-1747

Telephone (301) 279-3425

July 23, 2001

Mr. Charles Loehr, Director  
Planning Division  
Maryland-National Capital Park and  
Planning Commission  
8787 Georgia Avenue  
Silver Spring, Maryland 20910

Dear Mr. Loehr:

SUBJECT: Montgomery Blair High School Forestation

This is to formally request an amendment to the forest conservation conditions of approval for the Montgomery Blair High School mandatory referral dated January 18, 1996. Under the conditions of approval, Montgomery County Public Schools (MCPS) agreed to satisfy its forestation requirements by planting trees at Triadelphia Reservoir in the Patuxent Watershed in cooperation with the Washington Suburban Sanitary Commission (WSSC). With over 20 acres to reforest, there was no room to provide forestation on site, nor could adequate space be found in the Sligo Creek Watershed where the school is located.

Montgomery Blair High School opened in September 1998. Subsequently, in March 1999, the Board of Education executed a Memorandum of Understanding (MOU) with WSSC setting forth the conditions upon which the Board would be permitted to enter upon designated portions of the lands surrounding Triadelphia Reservoir for tree planting and maintenance. A three-year survival period was required by the terms of the MOU, or one year in excess of code.

MCPS planned to move forward with the initial phase of tree planting in the fall of 1999, but postponed doing so due to drought conditions. In fact, MCPS struggled to meet the necessary 2-year survival requirement for a number of school projects where trees were planted on-site during two consecutive summer droughts in 1998 and 1999.

Recently, MCPS requested bids to perform its off-site forest mitigation for this and several other projects. The low bid proposes to take a credit for natural regeneration of forest on an island in the Potomac River. The per acre cost is approximately \$2,000 less than the cost that the Department of Public Works and Transportation has budgeted to plant at Triadelphia using the Montgomery County Conservation Corps. We are particularly concerned about the cost of tree survival at Triadelphia because of the existing deer population.

Mr. Charles Loehr

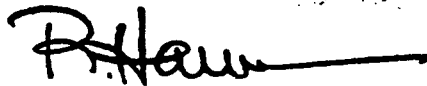
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July 23, 2001

Therefore, we request that the Montgomery County Planning Board amend the conditions of the mandatory referral to enable us to perform offsite reforestation at an alternate location, known as Mason Island in the Potomac Watershed, in lieu of the initial plan to use the Triadelphia Reservoir property.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Hawes", with a long horizontal line extending to the right.

Richard G. Hawes, Director  
Department of Facilities Management

RGH:sw

Copy to:

Ms. Conlon

Mr. Shpur

Ms. Turpin