

Councilmembers,

We are members of *Friends of Native Trees in Takoma* (FONTT), a group of Takoma Park residents who advocate planting native trees and other native plants in order to protect biodiversity.

We advocate strengthening the pending *Bill 25-22 Forest Conservation* in line with the recommendations put forth by the Montgomery County Forest Coalition and the additional suggestions that we present below.

In our view, this forest conservation bill offers admirable changes to the Forest Conservation Law and the Forest Conservation Trees Regulations. We would like to thank the staff who prepared this bill and the council for taking it up.

At the same time, the Montgomery County Forest Coalition has suggested areas in which the bill could be strengthened and expanded ([see \*Montgomery County Forest Coalition Top Recommendations for Updates/Amendments to MoCo Forest Conservation Law\*](#)). We hope that you can persuade the council to incorporate these changes in the bill.

**In addition, we strongly advocate that the bill be amended to require that only native species are specified or planted.** Non-native species will not adequately protect forest ecosystems. Indeed, the history of non-native species becoming invasive reminds us how dangerous it can be to plant non-natives. Straight native species should be strongly preferred. Native species cultivars are acceptable for landscaping. Hybrids of native and non-native species should not be acceptable.

Our other recommendations are as follows:

- ***Stronger management of invasive plants:*** In particular, forest easements should be required to manage invasive plants. A tax incentive should be created to incentivize compliance.
- ***More attention to vertically layered planting:*** Protecting a forest ecosystem requires planting to create ecological niches at every level: canopy, understory, shrub, herbaceous, and ground.
- ***Shade trees for social justice:*** Equity focus areas need shade trees to mitigate hot temperatures in summer, when shade makes walking, biking, and using public transport more bearable, and lowers utility costs. The allowance to substitute landscaping for afforestation and reforestation does not justify failing to plant shade trees in these areas.

Please ensure that shade trees receive preferential credit or treatment in plans in these areas.

Sincerely,  
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