



## AGRICULTURAL PRESERVATION ADVISORY BOARD

July 3, 2025

Kate Stewart, President  
Montgomery County Council  
100 Maryland Avenue,  
Rockville, MD 20850

### **Re: Opposition Letter – Bill 18-25 – Forest Conservation - Trees**

Dear Council President Stewart,

The Montgomery County Agricultural Preservation Advisory Board submits this written testimony regarding Bill 18-25, concerning Forest Conservation – Trees, and requests that it be entered into the public record for the upcoming public hearing on July 8, 2025.

The board has significant concerns about the proposed legislation, specifically the amendment to the definition of “tree.” Establishing a one-inch threshold diameter within this definition poses substantial challenges for agricultural operations.

This new definition will subject a large amount of woody vegetation on agricultural lands to stringent forest conservation mandates. Farmers and landowners must have the authority to manage vegetation effectively, particularly invasive species, to maintain fences, field perimeters, and other vital areas.

Woody shrubs can rapidly grow to a diameter of one inch and are often found in areas on the farm that have been temporarily uncultivated. The best management practices recommended by the Montgomery Soil Conservation District usually call for the removal of volunteer vegetation. However, enforcing compliance with forest conservation requirements, or providing exemptions for the removal of this vegetation, will impede a farmer’s ability to restore these areas quickly and effectively.

Additionally, obtaining an agricultural exemption from forest conservation requirements is often a burdensome process. This places an unnecessary burden on operators who are diligently working to maintain their agricultural properties. It is crucial that this committee advocates for a definition that supports the needs of agricultural operations, enabling them to thrive without such impediments.

The APAB looks forward to working with the Council on this bill to understand its full implications on the agricultural community. Existing forest conservation laws already pose significant challenges for farms, and this bill only exacerbates those challenges.

Sincerely,

Randy Stabler, Chair  
Agricultural Preservation Advisory Board (APAB)