

To Whom It May Concern,

My name is Chris Miller, and I am submitting comments on behalf of Lone Oak Farm, a working agricultural operation located in Montgomery County, Maryland.

Lone Oak Farm is an active farm that produces grain crops on-site and also partners with other local farms to source agricultural products. These crops are processed through our on-farm agricultural facilities, including our farm malt house, brewery (Lone Oak Farm Brewing Company), and distillery (Fallen Oak Distilling). In addition to production agriculture, we conduct agritourism activities that support the financial sustainability of farming operations and help connect the public to local agriculture.

My family and I live on the farm, and our businesses are locally owned and family operated, not private equity backed corporations. The decisions we make directly affect our ability to keep farmland in agriculture for the next generation. The activities we have developed are not separate from agriculture; they are what allow us to remain a working farm and preserve open space in Montgomery County.

We appreciate the opportunity to provide comments on the proposed updates to the Maryland Stormwater Design Manual and strongly support the State's goals of environmental protection and water quality. Farmers depend on healthy soil and clean water more than anyone, and we are committed to responsible stewardship of our land and natural resources.

However, the current regulatory framework often applies stormwater standards developed for urban and commercial land development directly to agricultural operations, even when the land remains in agricultural use. This creates significant challenges and unintended consequences for farms without necessarily improving environmental outcomes.

As noted in comments submitted by the Montgomery Soil Conservation District, the Maryland Stormwater Design Manual was largely developed to address residential and commercial land uses rather than agricultural landscapes. In practice, agricultural activities — including modern value-added agriculture — are frequently treated as “land development,” which creates regulatory confusion and barriers for farmers.

From the perspective of Lone Oak Farm, we respectfully offer the following recommendations for consideration:

Recognition of Modern Agricultural Operations

Agriculture has evolved significantly, and farms increasingly rely on value-added processing, on-farm manufacturing, storage, agritourism, and direct-to-consumer sales to remain economically viable. These activities should be clearly recognized as agricultural and accessory agricultural uses when they are directly tied to farm production.

Facilities such as malt houses, breweries, distilleries using farm-grown products, and associated agricultural business spaces should not automatically be treated as commercial land development when they are integral to agricultural operations.

Role of Soil Conservation Districts

Soil Conservation Districts have decades of experience working with agricultural operations and are best positioned to guide stormwater compliance on farmland. Their involvement should be prioritized for agricultural projects to ensure practical, cost-effective, and environmentally appropriate solutions.

Flexibility for Grass and Seasonal Parking Areas

Farms frequently utilize grass or reinforced turf areas for seasonal or intermittent parking associated with agricultural operations and agritourism. Treating these areas as permanently impervious surfaces creates unintended incentives to install asphalt, which increases runoff and environmental impact. Flexible standards that consider frequency and duration of use would better align with environmental goals.

Recognition of Agricultural Land as a Stormwater Treatment Resource

Agricultural properties typically contain large pervious areas, including cropland, pasture, and conservation areas, which naturally infiltrate and treat stormwater. The manual should recognize these features as viable treatment opportunities where appropriate, reflecting the differences between agricultural and urban environments.

Easement and Parcel Flexibility

Stormwater easement requirements designed for subdivision development can be excessive when applied to large agricultural properties. Alternative approaches such as covenants, owner certifications, or inspection agreements should be considered, particularly where infiltration practices are used.

Flexibility should also be provided to allow treatment areas to cross parcel boundaries when parcels are under common ownership, which would allow more effective and less costly environmental solutions.

Supporting the Economic Viability of Family Farms

Agriculture in Maryland faces increasing economic pressure, and farms must diversify to remain viable. Regulations that unintentionally treat farms as commercial development projects can discourage reinvestment in agricultural operations and accelerate farmland loss.

Modern agricultural operations like ours — where crops are grown, processed, and sold locally — represent the future of sustainable agriculture in Maryland. Updating the Stormwater Design Manual to recognize these realities will help preserve working farms, protect rural economies, and maintain agricultural land for future generations while still achieving environmental protection goals.

In closing Lone Oak Farm is committed to soil health, water quality protection, and responsible land stewardship. We believe that recognizing the unique characteristics of agricultural landscapes within stormwater policy will produce better environmental outcomes while supporting Maryland agriculture and family farms like ours.

We appreciate the opportunity to provide input and welcome continued collaboration with the State of Maryland on solutions that protect both the environment and the long-term viability of farming.

Thank you for your time and consideration.

Sincerely,
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