

November 28, 2021

Planning Advisory Board
Anne Arundel County
2664 Riva Road
Annapolis, MD 21401

Re: Comments on the Planning Advisory Board Draft (PAB Draft) of the *Anne Arundel County Green Infrastructure Master Plan*, October 27, 2021

The Advocates for Herring Bay (AHB)¹ appreciate the opportunity to offer our recommendations to the Planning Advisory Board on ways to ensure the successful implementation of Anne Arundel County's Green Infrastructure Master Plan. We fully support the county's goals for conserving an interconnected network of its most significant natural lands, but believe that achieving those goals will require three additional actions:

1. Accelerating the pace of conservation. The county's plan envisions conserving 5,000 acres by 2030, a goal that should be achievable given that the county preserved a similar amount in the previous decade. At that rate, however, it would take several decades to conserve the remaining 25,000 acres that currently are unprotected, increasing the risk that much of that green infrastructure will be lost to development.² *AHB recommends raising the targets and developing strategies that will put the county on a path toward conserving all unprotected lands by 2040.*

2. Making ecosystem values part of the decision-making process. As noted in Appendix F of the PAB Draft, the Maryland Department of Natural Resources (DNR) has developed a scientifically based analytical tool for quantifying the economic value of the services provided by forests, wetlands, and other ecosystems, such as absorbing and filtering stormwater and air and water pollutants.³ One way to reduce the risk of losing green infrastructure is to ensure that policymakers are aware of the economic value of its ecosystem services—which averages more than \$3,000 per acre per year— before they make land-use and budgetary decisions, especially decisions affecting unprotected lands.⁴ *AHB recommends requiring the Office of Planning and Zoning or other appropriate staff to provide data on DNR's ecosystem services valuations to county policymakers prior to any decisions affecting acreage designated as green infrastructure.*

3. Developing and testing new conservation tools. In our view, the county's conservation strategy should continue to focus on preserving land in perpetuity through easements and acquisitions. However, given the rising cost of land and limits on the pool of interested landowners, we believe the county needs a more diverse mix of strategies to meet the conservation challenges of the future.

¹ The Advocates for Herring Bay, Inc. is a community-based environmental group in southern Anne Arundel County.

² As shown in Table 4 in the PAB Draft, 30,855 acres of the county's green infrastructure currently lacks protection. Nearly 4,000 acres of that total are in the Herring Bay area.

³ For more information on DNR's valuation of ecosystem services, see [Ecosystem Services](#) and [Greenprint GIS](#).

⁴ See statistics on the total acreage of green infrastructure on Table 4 of the PAB Draft and on the total ecosystem services value on Table 1 in Appendix F.

In exploring options, the county can draw on the experience of other programs. The federal government, for example, has experimented with the use of competitive auctions to award funding to landowners for achieving certain pollution reduction goals.⁵ Could something similar be done for conserving green infrastructure? Many property managers now rely on a mix of purchases and leases. Could the county increase the number of acres being protected in the near term by “leasing” ecosystem services for a fixed period of time (e.g., 20 or 30 years), which might appeal to landowners who are reluctant to enter into irrevocable contracts? Could the county boost interest in easements by offering owners a supplemental payment if traditional real estate appraisals result in a significant undervaluation relative to the value of the land’s ecosystem services? Are there models from other jurisdictions on ways to spur the development of new green infrastructure in urbanized areas?

While we need fresh approaches for ecosystem conservation, it is imperative that any new strategies undergo rigorous reviews before being adopted county-wide. *Thus, AHB recommends that the county initiate a process for investigating and testing the effectiveness of alternative financial incentives.* This process should include two core elements:

- Establishing a technical advisory panel of scientific, legal, and financial experts to identify and evaluate options; and
- Funding a small number of pilot programs, developed in consultation with the appropriate citizen advisory groups, to test new incentives that would be relevant for priority habitats (such as those in the Critical Area) and green spaces in urban areas.

Once that phase is completed, county staff and the advisory groups could submit recommendations to the County Executive and County Council on the merits of implementing new tools on a county-wide basis.

Thank you for considering our views.

Stephen Marley
On behalf of the Advocates for Herring Bay

⁵ See [World Resources Institute, Paying for Environmental Performance](#), January 2007, and [U.S. Department of Agriculture, Options for Improving Conservation Programs: Insights from Theory and Economic Experiments](#), January 2015.