



February 14, 2019

Rural and Critical Lands Board
PO Drawer 1228,
Beaufort, SC 29901

Re: Community Development Department solicitation of public comments

Chairman Matthews and board:

Thank you for the opportunity to comment today. Broadly, we'd like to discuss our philosophy of why land conservation is so important to future land use and regional health, why specific public financing programs like the Rural and Critical Lands Program are important to the region, and thoughts on improvements to the program regarding policies, procedures, transparency and evaluation criteria. We will follow up with complete answers to the questionnaire and a written letter.

The significance of landscape-scale conservation:

First, it is important to put this program in context: why has this successful program been supported by voters five times and counting? Land conservation is a critical tool for managing growth, protecting water quality and enhancing the quality of life. This comes not from small parcels alone but large swaths of protected land that offer corridors for wildlife, absorption of stormwater and working rural landscapes.

A sustainable future for our region will largely depend on the conservation community's ability to align the interests of many county and municipal leaders, economic development leaders, education leaders and others to support permanent land protection and conservation financing region-wide. Development patterns and land conversion have a significant impact on the Port Royal Sound region as a whole, the fishery economy, the resilience of the community to sea level rise and flooding and conservation value.

The Beaufort County Rural and Critical Lands program, begun out of a recommendation in the 1999 Comprehensive Plan, is one such tool for increasing land protection in the region. With this program, the community can leverage public dollars to protect keystone rural parcels that would halt the march of encroaching development and thereby protect productive wetland systems, wildlife habitat and working farms, forming a vibrant rural greenbelt around the county.

Quality of life benefits from land protection include healthy fisheries, improved or stable water quality, traffic mitigation, natural resilience to floods and storm surges, ability for marsh migration in river corridors, preservation of farm and timber land and their economic value, preservation of rural way of life including hunting and fishing, access to water and waterways by the public.

The Coastal Conservation League is a long-time supporter of the program. We've supported the program directly by working on the 1999 Comprehensive Plan and supporting advocacy campaigns to get out the vote for referendums. We've also worked indirectly to support the program, by participating extensively on land use plans to protect rural land uses and prevent inappropriate development. In this vein, land conservation and specifically Rural and Critical lands acquisition should be a complement to existing land uses and not just a bail-out for developers. Land conservation, land use and transportation planning are three legs of the stool for a vibrant landscape.

How can we build on this programs' benefits and success?

We believe the RCLP process can be improved to better meet the goals of the program for future "rural" and "critical" protections. At a minimum, the following amendments are necessary:

- Expand eligible applicants to include land trusts, municipalities, and counties working in coordination with Beaufort County Open Land Trust
- Create an application process or public quarterly project review that will allow for meaningful competition and transparency among qualified projects,
- Improve valuation criteria, emphasizing financial leverage and regional benefit
- Suggest a greater funding priority on protecting rural lands via conservation easement or purchase of development rights,
- Improve RCLP Board Configuration, continuing to attract board members with backgrounds in estate law, finance, rural land ownership, agriculture or conservation rather than only focusing on district addresses

Expand eligible applicants where project selection is done in consultation with Beaufort County Open Land Trust but open to qualified applicants including land trusts, municipalities and counties. This allows for municipalities and other land trusts to work together with Beaufort County and the Beaufort County Open Land Trust and secure land protection. This has been done well in the past but policies and procedures may need to be amended to facilitate this collaboration.

Create a public application process or quarterly project review. This process should take place in public session. This could take several forms but the intent is to provide a transparent, competitive, and efficient process so that strategic parcels can continue to be protected with easements at the fairest cost to taxpayers. This also ensures the public's awareness of the potential for land protection, and likely a cadre of enthusiastic supporters.

An application process or regular review periods gives staff and board members an opportunity to review projects in groups rather than isolation. The approved valuation criteria become even more valuable because they are used to compare conservation and critical value of each projects. This process provides an avenue for projects to emerge and be evaluated by their own merit against program goals and others projects in the application group. In a county where many parcels are beautiful, rich in natural resources, and of interest for preservation, comparison of projects creates opportunity for fair evaluation and ideally should allow the best, more important project to move forward and earn funding.

This process could also give municipalities and other land trusts an opportunity to apply for funds or pursue land protection.

Systematic project review also allows for a public hearing with some information able to be shared publicly, which has generally been very meaningful to voters/supporters. Overall, this could result in even broader support for a popular program. The recent public engagement on Whitehall project proves the public is interested in, excited about, and deserves to know about land conservation purchases in the pipeline.

Improving criteria to emphasis partnerships and funding: All projects should be highly-leveraged: Funding sources could include Rural and Critical Lands program dollars, landowner donation via bargain sale easement, private foundation dollars, private fundraising, federal and state grants, among others. We are increasingly sensitive to over-reliance on Rural and Critical Lands dollars as the sole source for land protection money. Projects should reflect a diversified funding strategy so that more land can be protected per dollar spent. This also enables the program to be closer in line with the price per acre spent by the State Conservation Bank and other conservation funding. Establishing a precedent with a high price per acre creates a standard that other counties can't meet. This may result in reluctance among neighboring properties in other jurisdictions like Jasper County to protect their land unless they can receive the price the Beaufort pays.

An emphasis on easements in the rural areas: Buying development rights on rural land, rather than fee simple, is a smart strategy; it staves off development, keeps land on the tax roles, encourages traditional rural uses like farming and forestry, protects water quality and wildlife habitat, protects our air base, and does all of this for pennies on the dollar.

Per the referendum, up to 20% of the funds can be used for passive park infrastructure. The existing County passive parks inventory is large (at ~11,500 acres) and the allocated 20% is essential for trails, gravel parking lots, signage, and to accomplish the many goals of the County's Passive Parks plan. Therefore, the priority for the remaining funds should be conservation easements and the purchase of development rights rather than fee simple acquisition. Fee simply acquisition adds to the future Passive Parks inventory, adds to county ownership and maintenance costs and is an expensive way to protect land.

Continued Improved board configuration with preference given to board members that represent various interests, rather than just county regions. This should maintain 1 board member appointed by each council member but encourage backgrounds related to land conservation interests, finance, real estate, rural land ownership, agriculture, fishing, or estate law. These are common qualifiers found in similar programs and could give council a better guideline for appropriate board members. This configuration is also similar to what is required for other boards (e.g. Design Review Board, an architect must serve on the board).

Scoring Criteria should reflect the goals of the program.

The program is especially important for *the rural areas*, where working farms, forest, protected air space and family lands abound. *The program is critical for the urban edges, where inappropriate growth threatens to change this rural landscape.* Binden Plantation and the Mobley tract are prime examples of protected properties that were once threatened by

inappropriate development. Protecting natural resources, including prime soils, and evaluating the threat of development should be weighted heavily in the scoring rubric.

We also believe the project must be highly leveraged via a public/private partnership and based on a justifiable price per acre valuation, and those metrics should be weighted heavily in the scoring rubric.

In general, we emphasize natural resource protection, attention to development pressures and future land conversion, protection of rural farmland, the ability to leverage additional financial support of the given property, and ability for the property to meet the needs of the Greenprint and add to the regional greenbelt and protected landscape. In our response to the questionnaire, we will elaborate on the scoring criteria in more detail.

Conclusion:

Additional transparency can only help the widely successful program. Through coordinated and collaborative investments, over 1.2 million acres have been protected on the South Carolina coast. Locally, we have great stories to tell from past successes and future opportunities Binden, Lemon Island, Henry Farms, New Riverside and others are all great stories of land protection in strategic places that have benefitted us as a region. We have more work to do in these strategic rural corridors of incredible landscapes along Sheldon Church Road, the New River, Okatie Highway and on St Helena.

We look forward to future participation in the Greenprint process and in support of the program.

With thanks,

Kate Schaefer
Director of Programs
Coastal Conservation League