



Testimony in Opposition to **House Bill 991 – Natural Resources - Forest Mitigation Banks - Qualified Conservation**

March 24, 2021

Dear Chairman Pinsky and Members of the Committee,

Thank you for this opportunity to submit testimony **in opposition to HB 991 - Natural Resources - Forest Mitigation Banks - Qualified Conservation** - on behalf of ShoreRivers. ShoreRivers is a river protection group on Maryland's Eastern Shore with 3,500 members. Our mission is to protect and restore our Eastern Shore waterways through science-based advocacy, restoration and education.

On the Eastern Shore, trees are the most important resource to help mitigate sediment and nutrient pollution, and to prepare our vulnerable shorelines for sea level rise, extreme storms events, and other harmful effects associated with climate change. **A bill that allows development projects to remove up to 100% of the trees on a site with no mandated replanting poses a terrible threat, which undermines the gains environmental non profits and municipalities alike have worked so hard to fund, and implement.**

This legislation preempts the anticipated Forest Conservation report underway by the Hughes Center. The Hughes Center Report was [requested by the General Assembly](#) to clarify data needed for educated decision-making in forest conservation. The report is specifically charged with investigating appropriate uses of forest mitigation banks. **It is unreasonable to pass a bill with such extreme impacts before the results of this comprehensive study.** Additionally, this legislation would reverse the *recent* opinion of the Attorney General (AG) that clarified the parameters for how counties use forest mitigation banks. In effect, this bill would save half (or fewer) of the forests than were being preserved last year. Worse still, there are no standards ensuring that the forest offered for preservation has high ecological value or is at risk of being lost to development.

When engaging with County departments as the Chester Riverkeeper on matters related to development in my watershed, I receive consistent feedback that the environmental regulations set by the State are not strong enough to justify rejecting projects that are inconsistent with their Comprehensive Plan. Counties caught between economic opportunity and their duty to preserve their rural character and resources will be powerless to advocate for their interests, without being viewed as punitive and arbitrary, when the State of Maryland adopts such low standards of preservation. **Developers will be empowered to cut down every bit of forest not under permanent protection, getting further away from a no-net-loss goal.** Every tree counts on the Eastern Shore. For this reason and the examples described above, ShoreRivers looks for an **unfavorable report for House Bill 991.**

Sincerely,

Annie Richards, Chester Riverkeeper on behalf of:

ShoreRivers

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