



Wes Moore, Governor  
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**Maryland Department of Natural Resources  
Fiscal Year 2025 Operating Budget  
Response to Department of Legislative Services Analysis**

**House Appropriations Committee  
Transportation and The Environment Subcommittee  
Delegate Courtney Watson  
February 22, 2024**

**Senate Budget and Taxation Committee  
Public Safety, Transportation, and the Environment Subcommittee  
Senator Sarah K. Elfreth  
February 23, 2024**

**Recommendation #1 (p. 7)**

*The Department of Legislative Services (DLS) recommends that DNR discuss all the types of closures the MPS experiences, the frequency of these closures, and what is being done to limit each type of closure.*

**Agency Response:** In addition to capacity closures of park facilities, MPS also experiences temporary closures related to significant weather events and infrastructure failure and repair.

The nature of these closures may be incidental and emergency, whereby an imminent risk is posed to staff and visitors. Examples of closures of this nature would include icy or snow-covered roads, high water and flood risk, strong winds, falling trees, sanitary sewer failures, water quality concerns, law enforcement activities, search and rescue operations, damaged and/or compromised facilities, power outages, and so on.

Other closures may be prescribed in advance to affect needed park improvements, such as scheduled critical maintenance and capital improvement projects, and land management activities such as prescribed burns and managed hunts.

The frequency of closures varies greatly. Emergency closures are directly correlated to extreme weather events and aging facilities. Scheduled closures align with the appropriation of funds through the Critical Maintenance and Capital Improvement Programs, and timelines associated with securing contracts and completing work through DGS. MPS works closely with these partners to determine the least impactful time to feasibly perform work, but very often construction schedules impact park operations. In some cases, such as renovating or maintaining a public pool in a state park, a facility is scheduled to be closed for a single operating season and the closure may extend into a second season due to contractor issues. MPS is currently developing an improved system to closely track all types of closures in 2024 and beyond.

**Recommendation #2 (p. 13)**

*DLS recommends that DNR comment on the minority representation in NRP's 2024 class of recruits and what DNR is doing to reverse the negative progress toward the fiscal 2027 goal of matching Maryland's current 2020 Census demographics for Marylanders aged 20 to 41 years to the extent practicable.*

**Agency Response:** NRP has been in a self-imposed hiring freeze for fourteen months while the recruitment and hiring processes were reevaluated. The goal of revamping the process has been to remove identified barriers to recruiting and hiring individuals underrepresented in the NRP workforce. To that end, NRP has made the following changes:

The NRP has two full-time recruiters who attend job fairs and community events and visit high schools, colleges, and military installations to attract a diverse pool of cadet and officer candidates. Recently, 10 extra duty recruiters were added to enhance recruitment efforts. Recruiting in higher education has focused on Historical Black Colleges and Universities (HBCU), UMES, and Minority Serving Institutions. Recruitment efforts have included participating in community events, such as National Night Out, in diverse communities in Prince George's County, Anne Arundel County, Baltimore County, and Baltimore City. NRP has established a relationship with the MEACC and CIAA, two historically African American athletic conferences, to recruit at their spring athletic tournaments. The Recruitment Section has engaged with urban and Hispanic radio stations for ad placement in an effort to reach underrepresented communities. In-person and virtual information sessions have begun for interested candidates. Some of these sessions are specifically geared towards women and minorities. NRP has been working to hire an outside vendor to market and promote the Agency for recruiting efforts.

One of the barriers to hiring identified by the Maryland Legislature in 2022 was the disqualification of applicants during the written test. Analysis of the limited available data indicates that a high percentage of minority applicants are disqualified for failure to pass the written test. In the upcoming entry-level recruitment and hiring cycle, NRP will shift from using the traditional POST test to the Law Enforcement Aptitude Battery Test (LEAB). The POST test includes academic testing components such as math, reading comprehension, and report writing; however, modern testing eliminates much of that because technology has rendered such testing obsolete. Additionally, the traits looked for in modern police officers have changed. That change has led to the inclusion of the evaluation of non-cognitive components such as an individual's preferred approach to work-related tasks and relationships, relevant life experience, life history, and mindset.

Often, entry-level tests attempt to predict either the ability to successfully complete a police academy (8.5 months of training) or the ability to succeed as a police officer. The LEAB is predictive of both job requirements.

Cognitive testing of the LEAB includes deductive reasoning, inductive reasoning, information ordering, problem sensitivity, written comprehension, and written expression. Non-cognitive testing includes the Work Styles Questionnaire (WSQ) which focuses on an individual's preferred approach to work-related tasks and relationships, and the Life Experience Survey (LES), which focuses on relevant history and experience.

All measures are matched to job requirements, and each assesses a variety of underlying characteristics important in the performance of the duties and responsibilities of law enforcement officers. The LEAB covers six cognitive abilities and 34 personality/biodata characteristics.

The validation studies of the LEAB indicate it will be highly impartial to diverse applicants that the NRP is mandated by law to bring into the agency with no disparate impact on women and minorities, both of whom are underrepresented in the NRP and as such are mandated by law to increase among the officer ranks until their numbers equal those of the state census.

NRP has also changed the physical test for entry level applicants so that it mimics the MPTSC assessment required to be completed annually by active certified officers. The previous physical test had no basis in the day-to-day work of a police officer and often eliminated female candidates from the hiring process.

The entry level hiring process was expanded during the last hiring cycle to numerous regions of the state to make the process more accessible to all communities. Previously, the testing was conducted in one central location which limited the opportunity to people with the resources to take a day off work and drive to a testing facility that may be several hours from their residence.

Another barrier identified by the Legislature is the length of NRP's hiring process. The LEAB is an on-line test that provides immediate results which allows the NRP to move applicants to the next stage of the hiring process immediately, thus reducing the hiring timeline. NRP has also begun utilizing the eSOPH platform for conducting background investigations. eSOPH drastically reduces the time necessary to complete a background investigation because it is a cloud-based software system. It has streamlined NRP's background process while simultaneously enhancing standards and credibility.

Another effort to shorten the hiring process is an open and continuous hiring process. NRP is attempting to get this ability moving forward. NRP would be able to hire Officer Candidates throughout the year and keep them in a Cadet role until a training academy begins. This would drastically reduce the time it takes to hire an applicant and would do well with groups that cannot afford to wait for ten months to a year for the opportunity to join the NRP.

All NRP employees involved in hiring and testing will complete an implicit bias course above and beyond what is required of all officers. All Screening Committee Review members and Selection Committee members will undergo a briefing on the selection and scoring process to ensure each member is scoring and selecting within the written guidelines.

### **Recommendation #3 (p. 22)**

*DLS recommends that the \$5.7 million in general funds in MPS and \$1.0 million in general funds in the Forest Service be reduced contingent on a provision in the BRFA, authorizing the use of Program Open Space State fund balance to be brought in through a budget amendment to be used for the same purposes.*

**Agency Response:** The Department disagrees with this recommendation. Diverting funds from POS Stateside to other purposes will decrease acres protected in future fiscal years. While POS Stateside currently has a fund balance, that fund balance allows the program to continue aggressively pursuing land acquisition projects to meet the needs of citizens throughout the state. This is especially important given

the following two factors: 1. POS Stateside funds come from transfer tax revenues, which can fluctuate greatly from year to year. For example - POS Stateside is only scheduled to receive \$2.6 million in FY 2025, all of which go to the Heritage Conservation Fund. Funding in future fiscal years is also anticipated to be lower than recent funding levels. 2. The state's goal to protect 30% of the state by 2030 and 40% of the state by 2040. The current fund balance will be used in future fiscal years, especially in years with lower funding, to protect land throughout the state to advance the state's land preservation and recreation goals. The Department would also like to note that POS Stateside funds are also used to fund the Baltimore City Direct Grant, the Greenspace Equity Program, and POS Public Access projects, all vital programs to increase public access to protected lands and address equitable access. The POS Stateside balance will allow the Department to continue land acquisition projects while also funding these important programs.

**Recommendation #4 (p. 35)**

*DLS recommends that DNR comment on why the Parks and Recreation Commission's meeting has been delayed to May 2024 when the commission is required to meet quarterly, when DNR will form a workgroup to implement the recommendations of the independent consultant's park study, and how DNR will fund the recommendations in the study, given that there is no funding in the fiscal 2025 allowance for this purpose. DLS also recommends that DNR comment on how the transfer tax revenue reduction impacts MPS's operations in fiscal 2025 and what steps are being taken to address the long-term funding needs of MPS. Finally, DLS recommends that it comment on its plan for the comprehensive long-range strategic plan and what has been accomplished in terms of the development of the electronic asset management system for its infrastructure.*

**Agency Response:** The Parks and Recreation Commission (“Commission”) will be meeting in May of this year and will continue as required by the new Chapter 39 provisions. The Department paused the start of the Commission and development of the long-range strategic plan in order to fully staff the leadership of the Maryland Park Service (MPS). It is generally well known that significant changes were required at the MPS leadership level after personnel impacts borne of an internal and external investigation during the prior administration. The new Administration appointed 19 new senior staff, including a new Director and Deputy Director for the MPS. These personnel actions temporarily preempted the ongoing planning process. As a result, the Commission and the long-range plan development efforts are slightly behind the original schedule but with new leadership in place, these efforts will more appropriately reflect the philosophy and culture of the new MPS.

While there are no dedicated funds in FY25 for the purposes of implementing study recommendations, our review of the study's key findings indicate that some recommendations may be accomplished within the constraints of the projected budget allocation, via administrative and operational adjustments, reprioritization of projected expenditures, and increasing organizational capacity through the targeted recruitment of GMOA positions. Of course, many of the study's recommendations will require substantial dedicated funds to accomplish the intended goals, and it is expected that progress on these fronts will await future funding mechanisms.

The transfer tax revenue reduction will have a significant impact on MPS operations in FY25. MPS is actively taking steps now to adjust for substantial funding deficiencies that will impact the unit's ability to meet optimal contractual staffing levels, cover supplies and materials costs, proceed with projected facility improvements, and engage in operational support functions such as training and professional development opportunities. Collectively, the MPS is positioning for across-the-board budgetary belt-tightening and focusing on basic park maintenance and operations in FY25.

It is broadly recognized that a sustainable, predictable funding model is needed to ensure the success and expansion of the MPS in the future. The long-term funding needs of MPS are actively being discussed by departmental leadership. The park system study provides a menu of potential funding models to this end, and strategies are being reviewed and considered by DNR leadership for feasibility of implementation and ability to affect durable solutions.

DNR's Engineering & Construction unit has begun implementation of the electronic asset management system to inventory all department-owned infrastructure and track needed maintenance and repairs. Several employees have already been on-boarded and initiated field work associated with this program. This work will continue into FY25.

**Recommendation #5 (p. 36)**

*DLS recommends that the General Assembly work with the Administration on a plan to use the \$1.0 million in fiscal 2024 funding for the contract to manage an apprenticeship program given that the funding will not be used for that purpose. DLS also recommends that DNR quantify the goals of the MORE Commission and develop MFR input, output, and outcome measures that correspond to these numerical goals. In addition, DLS recommends that DNR submit a plan for implementing the recommendations of the MORE Commission along with the MFR input, output, and outcomes measures. The report should include the following: the status of implementation of the commission's five main recommendations; strategies for implementing the recommendations that have not already been completed; an updated analysis of the value that outdoor recreation generates in Maryland as a whole and, if available, by county, using Bureau of Economic Analysis data; the state of outdoor recreation and heritage tourism in Maryland, using information from the updated Maryland Land Recreation and Preservation Plan; and the opportunities that a Chesapeake Bay National Recreation Area creates for Maryland.*

**Agency Response:** DNR leadership made a strategic decision to temporarily assign the Office of Outdoor Recreation (OOR) director to address the very critical and immediate needs of the Maryland Park Service from April - Sept 2023 based on his past years of experience there. We have since appointed a new OOR Director in December of 2023, and the office is now in the process of a re-build consistent with the MORE Commission recommendations. OOR is actively working on many of the issues/actions identified in the MORE Commission report and will submit a plan for implementation of the recommendations, along with additional OOR-supported actions identified in the Great MD Outdoors Act and other priority actions of the Moore Administration along with strategies, timelines, status and MFR metrics by June 30, 2024.

While the OOR Implementation Plan and associated MFR's are being finalized, the OOR has begun discussions with several MD Universities including Frostburg State University and the University of Maryland regarding refining or developing county-based outdoor recreation data based on the Bureau of Economic Analysis Data. The State Land Preservation and Recreation Plan is currently open for bid, and the data and analysis of this plan along with the Maryland State Park Strategic plan will inform the MORE strategic implementation as they are developed. DNR will continue to work with the MD Department of Commerce, National Park Service, and numerous local partners to provide analysis and identify opportunities for heritage tourism and a Chesapeake Bay Natural Resource Area in Maryland.

In FY25 funds will be used to carry out the recommendations of the MORE commission including hosting the first-ever statewide Outdoor Recreation Summit to bring together outdoor recreation leaders, community organizations, tourism officials, and land managers to collaborate to fully realize the power of an outdoor recreation economy. Funds may be used to establish, direct, and promote an outdoor equity fund to increase participation in the outdoor economy by underserved communities and to support partners such as University Outdoor Recreation Offices, Maryland Forest Service the Greater Baltimore Wilderness Coalition, and more. Also, the OOR will work to communicate the benefits of outdoor recreation and the power of the outdoor economy through presentations, articles, social media, interviews, and more.

One of OOR's goals is to increase access to apprenticeship program opportunities and strengthen connections with colleges and vocational schools to provide skills, certifications, and training needed to support growth in outdoor recreation. Funds will also be used to develop a framework for an outdoor recreation apprenticeship program and to identify ways that DNR can manage outdoor recreation activities with the stewardship of our natural resources in mind. Working with partners to provide a forum for engagement with Maryland-based educational institutions to gain perspective on opportunities and barriers to growing the outdoor recreation curriculum, along with the Maryland Department of Labor to build upon existing apprenticeship programs and grow the Green Jobs initiative. OOR has already established relationships with the Frostburg State University Center for Outdoor Recreational Institute, Garrett College, and Allegany College of Maryland to train students in small engine repair and bicycle maintenance to serve a growing need for skilled labor in those fields in Allegany and Garrett Counties. Other partnerships developed include the Maryland Apprenticeship Connection, Salisbury University, Community College of Baltimore County, Frederick Community College, Hagerstown Community College, Baltimore City Schools, Grow Home, Howard EcoWorks, Defensores de la Cuenca, Maryland Reentry Resource Center, Maryland Department of Labor, and Maryland Project Green Classrooms. Other potential apprenticeship programs may include trail-building and community engagement.

Between its creation in 2021 and February 2024, the Office of Outdoor Recreation accomplished the following to support our pillars:

1. Environmental conservation and stewardship: Represented Maryland at the National Confluence of States Outdoor Recreation Partnership; participated and supported the DNR R3 Matrix team including leading the development of grant applications; supported the Es Mi Parque Programs by highlighting conservation and stewardship.
2. Education and Workforce Development: Worked with Frostburg State University, Allegany College of Maryland, and Garrett College to support the development of bicycle repair and small engine repair training programs; partnered with Greater Baltimore Wilderness Coalition to coordinate climate crew job hubs and promote outdoor recreation jobs; and established partnerships with FSU and Salisbury University outdoor recreation and leadership programs.
3. Economic Development: Established partners with the Greater Cumberland Committee, MD Department of Commerce- Department of Tourism, local businesses and more to identify high-priority projects and efforts to promote the outdoor recreation economy in Mountain Maryland and across the state. Presented outdoor recreation programs and opportunities at the MD Tourism Council and the PACE meeting as well as started the planning process for an outdoor recreation summit to be hosted in FY25.
4. Exercise Health and Wellness: Developed and conducted an e-bike survey of users, store owners, and land managers to inform an e-bike policy; established a partnership with the

MD Forest Service to design and build new mountain biking trails; partnered with the education team at DNR to obtain kayaks and fishing equipment to conduct recreational and educational programs and developed and submitted a grant proposal on behalf of the DNR R3 team to connect college students across the state to the MD fly fishing trail.

5. Equity, Access, and Inclusion: Partnered with the education team to establish a Girls Exploring Outdoors program; provided Spanish translations and training to the MD Parks Service and Natural Resources Police; coordinated the ADA and accessibility recreation offerings including programming, infrastructure, equipment, and more.

In addition, in 2023, the Office of Outdoor Recreation hosted the Annual Spring Confluence of States National Conference here in Maryland. The Confluence of States is an organization made up of outdoor recreation economy professionals from across the country. The group conducted collaborative working sessions during the conference that included discussions on education and workforce training, stewardship of our natural resources, and opportunities for nationwide expansion. The Office also hosted an open house at Wolf Den Run State Park and participated in events such as the Fat Tire Bike Race at Herrington Manor and McHenry Park, and the first ever National Interscholastic Cycling Association regional championship at Fair Hill NRMA. The OOR has formed partnerships with groups such as the Southern Maryland Conservation Alliance, the Outdoor Recreation Roundtable, Fish & Hunt Maryland and the DNR DEIJ Director and working group.

The long-term plan for OOR is to support outdoor recreation across the department and state and therefore increase access to nature and opportunities to create stewards of our natural resources. This will be done through making spaces and activities more inclusive, expanding access, and amplifying the diverse and rich recreation opportunities in MD. OOR is housed in the Office of the Secretary so it can play a leadership role in the coordination of policy, planning, and outreach on recreation and stewardship across the whole Department. We will track our success through partnerships, policies, projects and public engagement events.

### **Recommendation #6 (p. 37)**

*DLS recommends that DNR comment on why it was only recently determined that the 100% RPS supplemental study would not be completed on time, given that Chapter 757 became effective on October 1, 2019. DLS also recommends that DNR describe the Power Plant Research Program's workload since October 1, 2019, in terms of the time and funding spent on the 100% RPS supplemental study and Certificate of Public Convenience and Necessity licensing review. Finally, DLS recommends that DNR comment on whether the current electricity surcharge rate supporting the Environmental Trust Fund is sufficient to fund the Power Plant Research Program's existing base workload as well as new studies that may be required to meet climate change goals.*

### **Agency Response: 100% Renewable Energy Portfolio Standard Study**

The Clean Energy Jobs Act of 2019 (SB516) requires the Power Plant Research Program (PPRP) to conduct a supplemental study to assess the overall costs and benefits of increasing the Renewable Portfolio Standard (RPS) to 100% renewable energy by 2040. This supplemental study is in follow-up to an earlier study of the RPS conducted a few years earlier and finalized in 2019. In planning the scope of the 100% Study, it was apparent there was interest in also evaluating the costs and benefits of meeting a 100% Clean Energy Standard by 2040, which would allow energy from non- and low-carbon-emitting sources such as advanced nuclear energy and natural gas generation using carbon capture and storage

(CCS). By statute, the results of the supplemental study were due to the Governor and General Assembly on or before January 1, 2024.

The 100% Study is being led by PPRP's socioeconomic integrator, Exeter Associates (Exeter also led the previous RPS study published in 2019). Exeter's role is to oversee all the technical aspects of the study, manage the subcontractor conducting the energy modeling, and prepare the final report based on the results of up to 20 modeled scenarios forecasting Maryland's energy future. Exeter subcontracted with Vibrant Clean Energy (VCE) to perform modeling evaluations of various renewable and clean energy scenarios using VCE's Wisconsin capacity expansion and production cost model. VCE has conducted comparable studies to the Maryland 100% study and has substantial technical expertise and a wealth of renewable resource data that Exeter felt would be valuable in evaluating a 100% standard.

Delays can be attributed to difficulties faced by VCE. After kicking off the study with a stakeholder working group in August 2021, VCE had great difficulty in getting its model to run with all the assumptions and inputs developed by the group. Additional delays resulted from issues with key personnel at VCE (a serious health issue faced by the company CEO, followed by the departure of the project's lead programmer). By the time the model was ready to run, the Maryland General Assembly passed significant legislation including the enactment of the Inflation Reduction Act in August 2022 and, to a lesser extent, the enactment of an 8.5 GW offshore wind energy goal and a 3 GW energy storage goal, which forced additional changes to VCE's model, and added to the delay. In addition, Exeter, PPRP and MDE have met several times to incorporate MDE's climate pollution reduction plan, but that ultimately could not occur based on their deadline.

At this same time due to limited funds, PPRP requested that our Long-Term Energy Report biannually required be rescinded, and Governor Hogan in May 2020 did so allowing our socioeconomic integrator (Exeter) to redirect those limited funds to the RPS Study.

In addition, Senator Feldman sent a letter to PPRP in February of 2021 in response to a letter from PPRP acknowledging the repetitive nature of the proposed RPS study. Senator Feldman acknowledged the repetitions while requesting additional parameters to be studied further delaying baseline study runs and these included:

- The impact of alterations that have been made in the components of each tier of the standard, the implementation of different specific goals for particular sources, and the effect of different percentages and alternative compliance payment scales for energy in the tiers
- Whether the standard is able to meet current and potential future targets without the inclusion of certain technologies
- What industries are projected to grow, and to what extent, as a result of incentives associated with the standard
- Whether the state is likely to meet its existing goals under the standard and, if the state were to increase those goals, whether electricity suppliers should expect to find an adequate supply to meet the additional demand for credit.
- The availability of all clean energy sources at reasonable and affordable rates, including in-state and out of state renewable energy options
- Additional opportunities that may be available to promote local job creation within the industries that are projected to grow as a result of the standard



Initial model runs (Business-as-Usual, 100% RPS, 100% RPS with Calvert Cliffs, and 100% Clean) were presented to the workgroup in May 2022. Subsequently, VCE was sold to another company, and further delays resulted from contractor staffing shortages.

A second factor weighing on completing the 100% Study developed more recently and stems from diminished funding for the project. PPRP has a 5-year contract with Exeter to provide technical support with socioeconomic issues related to energy. Most of this work relates to PPRP's handling of licensing review of new energy generation and transmission line projects that require a Certificate of Public Convenience and Necessity (CPCN). When the 100% Study was formulated in 2019, it was believed that the contract had the resources to carry out its usual tasks as well as to support the 100% study. This would not turn out to be the case. With increasing CPCN caseload, inflation escalating labor category rates, and the loss of a key team member to illness, PPRP found itself with insufficient funds to complete the 100% Study. We noted this projected shortfall in Fall of 2022 and developed an amended budget request. This procurement was held up until February 2024; however, those internal problems have since been resolved.

PPRP worked on an additional contract modification in January 2023; however, procurement steps including the Board of Public Works approval process did not fully execute the contract modification until FEB 2024.

In summary, PPRP has diligently been working towards the completion of the 100% RPS Study since 2019 by forming a workgroup and receiving significant workgroup input on modeling parameters and runs, a task that continued for three years, the changing legislation mandates (baselines) concerning modeling runs (increased offshore wind target of 8,500 MWs, new 3,000 MWs of battery energy storage), and working with Exelon to assume that Calvert Cliffs would continue to operate well after 2035. Currently, PPRP estimates that the current invoicing for the 100% study equals \$750,000. The estimated total cost of the 100% RPS Study is \$1.2 million. PPRP is pushing to have this report completed and submitted by July 1, 2024 as stated above.

### Environmental Trust Fund (ETF)

The Environmental Trust Fund (ETF) was established in 1971 to fund the Power Plant Research Program (PPRP). Revenues for the ETF are generated through an environmental surcharge, which is currently based on kilowatt-hours of electricity distributed to Maryland retail customers. PPRP is 100% funded by the ETF which is based on electricity usage. This stable funding source was created by legislation specifically to fund PPRP. The fund is currently statutorily capped at 0.015 cents per kilowatt-hour of electricity sold. This translates to 15-20 cents on a monthly residential electric bill. Industrial customer accounts are also capped at a maximum of \$1,000 per month. Please note that this surcharge has decreased since its inception from 0.03 cents per MW/hr. to 0.2 in 1982 and then decreased again in 1986 to 0.15 MW/hr.

At the current ETF surcharge rate, PPRP estimates that expenditures will exceed income in FY25 based on current and projected workload and any projected studies. The projected shortfall is \$2.1 million in FY25. PPRP plans to use existing ETF fund balance to cover FY25 expenditures, but projects a deficit in future years.

### PPRP's current and projected caseload

PPRP is responsible for managing a consolidated review of all issues related to power generation and transmission in Maryland. This role - unique in State government provides a framework for the comprehensive review of all electric power issues with the goal of balancing need, cost and impact through the Public Service Commission's Certificate of Public Convenience and Necessity (CPCN) process.

Ten years ago, PPRP's workload averaged 5 cases per year. Currently, the office has nine cases and 15 additional cases in PSC's preapplication process which could file an application by the summer. This is a result of developers focusing on smaller community solar projects with 2- 5 MWs output. Currently, 70% of PPRP's workload is community solar projects. PPRP in coordination with solar developers will continue to see a significant increase in solar caseload due to Maryland's RPS solar shortfall and improving economic conditions in Maryland.

In addition, with the proposed offshore wind projects, data centers, and many transmission lines at or near capacity, PPRP has been actively meeting with utilities and projecting a significant long-term increase in transmission CPCN cases which each take one year or more for PPRP to complete. This does not include a significant new 60-mile transmission line from Harford County to western Maryland.

#### **Recommendation #7 (p. 39)**

*DLS recommends that DNR discuss how the deer management plan recommendations will be met without additional funding and positions in the fiscal 2025 allowance. DLS also recommends that DNR comment on how to increase access to land for deer hunting, given that this is the most important aspect of deer management success. Finally, DLS recommends that DNR comment on the impact of favorable deer habitat provided by suburban landscapes and the lack of natural predators on the deer management problems in Maryland and how these additional considerations may be addressed.*

**Agency Response:** DNR did not request the additional positions in FY 25 because there will need to be a new fund source for those positions. We have discussed potential options for raising the necessary revenue to support the new Deer Management Assistance Program ("DMAP"), including requiring fox chasers to purchase a hunting license (they are currently exempt from MD law but nearly all states require fox hunters to purchase a hunting license). This new funding source would need to generate sufficient special fund revenues, and any eligible federal match (typically 3 to 1), to support four DMAP positions, one for each region of the state - and one supervisor role. For the DMAP model to be successful in the long-term, it is critical that a stable fund source be provided for these positions in the future.

Increasing access to land for deer hunting will primarily occur through continued education of landowners and the public. DNR has employed an urban/suburban deer biologist for over two decades whose primary duties are meeting with communities to educate them on deer management. Opening communities to deer hunting is a major focus of these efforts. Similarly, one of the roles of the new Deer Management Assistance Program will be to expand these education programs to work with landowners to open more of their lands to deer hunting and to try to pair hunters with landowners experiencing deer damage.

The effort to expand outreach to more rural farmers was recently jump-started with a pilot program in partnership with MDA - and their outreach efforts to farmers in Maryland. Thus far, four farmers have

come forward to obtain technical assistance to improve their hunting and deer management efforts. More than 100 hunters are awaiting the opportunity to be matched to farmers in the future should more opportunities become available.

Access for deer hunting can also be improved through additional amendments to the current 150-yard safety zone law for archery deer hunting. Presently, 13 counties have reduced the 150-yard zone to either 50 or 100 yards for general deer hunting with archery equipment. These reductions are particularly valuable in urban and suburban settings where residences are located in close proximity. A statewide provision for 50 yards will provide greater access to deer hunters while reducing complexities for landowners, hunters and law enforcement. Access to private lands for archery hunters will increase the number of deer taken across the landscape, as evidenced by the number of deer taken by archery hunters in Maryland, including our more suburban counties.

In addition, simplifying the codified provisions for Sunday hunting is long overdue. Despite numerous efforts over the past 20 years, the Department remains concerned that the current subtitle is complex, difficult to understand for all parties and ultimately does not include sufficient opportunities in those counties with the highest deer populations in the state. Affording modern deer hunters and their friends/families a full weekend of hunting opportunity during the peak winter hunting seasons is the most effective means to reduce our deer population on a landscape scale and ensure future generations are available to continue the deer hunting and management model that exists today. Absent hunters buying licenses and taking deer, the state would lose the vast majority of funding for all species conservation in Maryland and be required to underwrite the cost of managing burgeoning populations of deer.

Finally, white-tailed deer are very adaptable and have readily taken to urban and suburban communities. These areas provide excellent habitat, abundant food, and protection from predators. As a result, these areas often have higher than normal deer densities and conflicts with humans are common. The urban/suburban deer biologist mentioned above routinely meets with communities suffering from these issues and provides information on lethal and non-lethal techniques that can be employed to help reduce conflicts. The Deer Management Assistance Program will also have a role in this education process. Managing urban and suburban deer is one of the greatest challenges DNR currently faces and education and working to increase access for deer hunting are currently the most effective options available.