The Benefits of Open Space: Chapter 9

Open Space Is a Good Investment: The Financial Argument for Open Space Preservation

A Resource Paper of the Association of New Jersey Environmental Commissions (ANJEC)

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Introduction

Open space is essential for modern life. It can be a breathtaking view from a mountaintop in Sussex County, a small urban park in Newark, a quiet garden in Trenton, a walking and jogging pathway in Morris County, rolling farmland in Hunterdon County, a wildlife observation center in Gloucester County, or a sea of marshland in Cumberland County. Whatever form open space takes, it provides sustenance for humanity and for all living things.

In densely populated New Jersey, we understand the urgency of open space preservation. Once developed, land cannot be returned to its natural state.

There are many reasons to preserve open space:

- to preserve our connection with the natural world,
- to provide tranquil, noise-free islands amid the rush and bustle of life,
- to ensure the health and diversity of wild animals and plants,
- to help lessen pollution by absorbing contaminants from our air and water,
- to maintain New Jersey's thriving outdoor tourism industry, giving places to fish, swim, boat, hunt and hike, and
- to avoid some costs associated with development.

In 1988 the governors of five New England states officially recognized open space as a characteristic responsible for bringing rapid economic growth to the region and for providing the foundation of a multibillion dollar tourism industry.¹

Many conservationists encounter the argument that their town will lose tax ratables if open space is purchased and taken off the tax rolls, or if development restrictions are placed on it. This paper shows the positive economic values of preserving open space. Among the findings:

- Studies show that residential development costs the municipality more in educational and public services than it generates in tax revenue. Over time, even commercial ratables may not provide anticipated tax relief.
- In the long term, municipal investment in open space and farmland is usually less costly than allowing

development.

- As land is developed, municipalities and developers often can save costs of infrastructure and municipal services by using a compact rather than a sprawling development pattern and preserving surrounding open space.
- Planning and preservation take place at the local level where concern about property taxes is considerable, so knowledge of the economics of open space preservation and resources for local advocates are important.

Open Space Preservation Is Our Responsibility

Providing open space is a major goal of the Municipal Land Use Law (MLUL), which regulates land use in New Jersey. Three of the MLUL's stated purposes (N.J.S.A. 40:55D-2) relate to open space. The MLUL directs towns to:

- "provide light, air and open space;"
- "provide sufficient space in appropriate locations for a variety of agricultural, residential, recreational, commercial and industrial uses and open space, both public and private, according to their respective environmental requirements in order to meet the needs of all New Jersey citizens;" and
- "promote the conservation of historic sites and districts, open space, energy resources and valuable natural resources...and to prevent urban sprawl and degradation of the environment through improper use of the land."

The 1968 state law (N.J.S.A. 40:56A <u>et seq.</u>) that permits municipalities to establish environmental commissions directs commissions to "keep an index of all open areas, publicly or privately owned." It further gives them the power to:

- "conduct research into the use and possible use of the open land areas of the municipality;"
- "recommend ... plans and programs for inclusion in a municipal master plan and the development and use of such areas;" and
- "subject to the approval of the governing body, acquire property...in the name of the municipality."

Avoiding the Costs of Residential Development

Preserving open space has the long-range benefit of avoiding future costs. Communities and counties across the state and nation are finding that single-family residential tax ratables don't cover the costs of municipal services, community infrastructure and local schools. Studies show that for every \$1.00 collected in taxes, residential development costs between \$1.04 to \$1.67 in services -- and these costs continue forever, generally increasing over time. Even including the initial cost of acquisition, open space is less costly to taxpayers over both the short and long term than development of the same parcel. The major public costs to preserve natural areas are finite, often paid by a bond or loan over 20 years.

A Burlington County Office of Land Use Planning study of Mansfield Township shows that for every \$1.00 in taxes that a new residential unit generates, it requires \$1.48 for services. Conversely, farmland costs \$0.27 in services for every \$1.00 it generates in taxes. Each new residential unit has a net negative fiscal impact of \$1,866 per year while preservation of the same land through the county farmland preservation program

would result in a one time cost of $$3000.^2$

In a similar study, East Amwell Township (Hunterdon) found in 1994 that for every dollar raised from residential development, it spent \$1.12 on public services. For every dollar raised by farm and open land, East Amwell spent 30 cents. For every dollar raised by commercial uses, East Amwell spent 27 cents (33 cents when utility and gas line revenue is discounted).³

Case Studies

In recent years several New Jersey municipalities have analyzed the fiscal impact of residential development (see Bibliography).

Washington Township (Morris) serves as an example of the financial impacts to the community of school costs alone. The Township purchased the development rights to preserve a farm after analyzing the costs and benefits to the school district's operating budget. It found that buying the development rights cost taxpayers less than allowing a new residential subdivision. The 1994 Washington Township study did not look at the development's capital and service costs, like new schools and fire houses.

The Township's zoning ordinance would have permitted 300 units of small, clustered housing on the 720acre property. The average cost per household to the school district, assuming one student per home, is \$5,568. The average residential property tax, excluding county taxes, is \$2,172. Given these facts, Washington Township concluded:

- The annual cost to the school district would be approximately \$1,670,400 (\$5,568 x 300 children).
- The anticipated revenue would be approximately \$651,600 (\$2,172 x 300 homes).
- The annual deficit for the school district budget would be \$1,018,800 (\$1,670,400 \$651,600).

The net cost for the development rights of the 720 acre farm was \$10.4 million. The public investment for the development rights could be offset in less than 15 years by avoiding the higher cost of the development. From then on the town would incur only the positive revenue flow from the farmland and attain the statewide and municipal goal of farmland preservation. In contrast, the cost of services for a residential development would continue forever.⁴

In Mendham Township (Morris) a citizens' group opposed to the development of 98 houses on a former Boy Scout reservation prepared an economic analysis in 1993. The citizens' group found that "at the current tax rate in Mendham Township, only senior citizens, residents with no public school children, or homes assessed for \$850,000 or more actually pay for themselves." Noting that costs for services for a development never end, the citizens' group showed that the project would increase the taxes for Mendham's property owners by an average of \$385 annually.

In contrast, preservation of the property, which the group estimated at \$4 million, would result in an average annual tax increase of only \$104 per household. This assumes a 25 percent Green Acres grant and a 75 percent Green Trust loan at 2 percent for 20 years. The study showed total costs to Mendham Township taxpayers of \$13.4 million with the proposed development and \$3.6 million with the land preserved using Green Acres.⁵

A 1994 Mendham Township Committee study assumed an \$8 million cost to purchase the property with an

average annual tax cost of \$377 per household. The 20-year cost to taxpayers was \$13.1 million, which included maintenance, local bonding, and loss of property taxes. But the Mendham Township study ignored the never-ending costs of services for the development and seemed to assume that costs would magically stop after 20 years.⁶

In 1994 the staff of the *Pinelands Commission* compared local taxes in 13 towns within the Pinelands Protection Area, where there is substantial farmland and public open space, with 13 similar towns outside the Pinelands. The results showed that living inside the Pinelands area costs the residents less. The average per capita tax increase from 1970 to 1990 was 42 percent lower in Pinelands towns than in non-Pinelands towns. In 1990 the average tax bill in the Pinelands towns was \$1,928, while in the non-Pinelands towns it was \$2,413. Pinelands residents pay 6.0 percent of their income on local taxes while non-Pinelands residents pay 6.9 percent.⁷

Long-Term Costs of Commercial Development

Although many municipalities believe that the best ratables are commercial and light industrial, even these can have unforeseen costs. A 1992 study commissioned by the Great Swamp Watershed Association concludes that the addition of commercial ratables in Morris County's 39 towns has failed to result in lower taxes.⁸

Comparing towns with a high percentage of commercial ratables to less commercially developed communities, the study finds that "ratable rich" towns, contrary to expectations, have found no tax relief. The 13 municipalities that ranked highest in the addition of ratables pay 57 percent of the local taxes. Despite adding \$4.2 billion in commercial and industrial ratables over 20 years, these communities did not see a reduction in their costs of running local government. Also, contrary to expectations, the tax rate for residential owners in ratable rich communities did not go down.

There are several reasons for these findings. The courts have increasingly ruled in favor of companies that appeal for tax relief. In addition, in five to ten years, employees move in and require services. Traffic and pollution increase so roads need to be widened and local quality of life deteriorates leading to lowered property values. Over time commercial real estate is depreciated while residential real estate increases in value, changing the balance of property tax assessments. Also, office buildings don't change hands as often as houses do, so their taxable value doesn't come as close to inflation. Thus the proportion of taxes paid by commercial ratables generally decline over time.

In *Keeping Our Garden State Green: A Local Government Guide for Greenway and Open Space Planning*, author Linda Howe points out that "commercial development may have hidden municipal costs. Such development, for example, may affect state requirements for low and moderate income housing. (Changes in equalized non-residential valuation is one factor used by the Council on Affordable Housing in determining municipal obligation.) Or it may necessitate an increase in spending for police and fire protection or traffic control, sewage treatment, or water supply." In some communities, tax revenues from new commercial developments also affect state aid allocations to schools, resulting in no net change in local revenue. (Less wealthy communities, which rely on substantial state school aid, will experience a reduction. Wealthier communities, which don't rely heavily on state school aid, may see little change.)⁹

The N. J. Office of State Planning agrees:

"Many communities view the capture of non-residential ratables as an important means of stabilizing or even reducing local property tax rates. While this may be true for some communities for short periods of time, the tax implications of non-residential ratables, particularly retail, are often considerably more complex than anticipated. New retail development . . . require(s) outlays for public services such as police, fire, courts, road maintenance and traffic control. In addition the availability of retail services often stimulates residential development nearby, requiring additional public services."

Decreases in state aid for schools and municipal services and increases in county and regional school taxes may offset increased revenues.¹⁰

If neither residential nor commercial development provide the ratables that a municipality needs, what should be the source of the funds? Dependence on property taxes to fund schools and municipal services forces communities to chase ratables in the belief that development will bring increased revenues. In fact, while the development may increase municipal revenues, it brings costs that are higher than the revenues themselves. The ratable chase results in land being consumed in anticipation of higher property tax revenues. If another revenue source made the difference between revenues and the cost of services, the municipality could pursue the land use plan it determines best for its future. It could plan for a mix of land uses -- high, medium and low income housing; commercial; retail and open space.

ANALYZING THE COSTS OF DEVELOPMENT

The following worksheet will help you analyze the costs of development vs. the costs of preserving of open space:

ECONOMIC ANALYSIS WORKSHEET

Certain general information is necessary for making the analysis. Local permutations abound. Discuss figures with local administrators and be sure that all assumptions are acceptable. A word of caution, a fiscal impact analysis doesn't address secondary or long-term impacts. The following is based on the work of David Nissen (Rutgers University). ANJEC's Resource Center has his analysis for Cranbury, NJ, with notes, comments, assumptions and uncertainties.

Basic Demography

* Number of households (Source: recent tax information)

a. _____

* Number of students currently in public schools (Source: School Board)

b._____

* Number of students school system can accommodate before new facilities are needed (Source: School Board)

C. _____

Assumptions

* Number of students generated by each housing unit:

d.

(Source: School or planning board figures. A large single family house generally produces 1.0-1.5 school children; a townhouse produces 0.3 school children; senior citizen housing, none; modify planning estimates using your town's actual data.)

* Cost per student:

e._____

(Source: School budget. Add capital budget and operating budget; divide by the number of student in the system.)

* New facility cost:

f.

(Once the threshold is passed, this figure comes into play. Capital outlay is roughly estimated-- Nissen's figures follow: State requires 100 square feet of school space per student; approximate cost per square foot = 100; capital cost per student (100 X 100) = 10,000; capital charge factor based on 40 year mortgage at 8 percent - if inflation occurs, this charge factor will rise. This produces an annual cost per student of 420. Since new facilities are built with room to spare, a more accurate figure can be estimated after conversation with school administrators. Nissen uses a figure of 1500.)

* Average cost of municipal services per household:

g._____

(Source: Municipal Budget. Subtract non-property tax revenues from total outlay and divide by the number of households. This number may be modified to reflect discussions with fire and police regarding at what point new facilities or equipment might be needed. Recognize that not all portions of the municipal budget vary directly with population increase or decrease.)

* Average market values of new housing unit

: h._____

(Source: tax information from other recent new units; real estate estimates)

* Effective municipal assessment rate:

i._____

(Source: local tax assessor)

* Municipal tax rate:

j._____

Method

* Educational outlay: students per housing unit (d) X cost per student (e) = \$ PLUS
new facility cost per unit (f) X students per housing unit (d) = \$
total 1
* Cost of municipal services per house
(g): 2
* Total municipal cost of one new housing unit
(line 1 + line 2) 3
* Municipal tax revenue for one new unit: Calculate by multiplying average market value (h) X effective assessment rate (i)
X municipal tax rate (j) 4
* Net annual burden or revenue of an additional new unit: Subtract line 4 from line 3 5

To compare the costs of residential development with the cost of a Green Acres loan, a municipality has to determine the debt service on a 20-year loan at 2 percent interest. Your township administrator or financial officer can help. Costs for farmland preservation vary with each municipality's contribution and level of indebtedness. Your county farmland preservation program can help here.

In making your case, emphasize that the obligation to pay off loans or bonds for preservation is finite. For example, a Green Trust loan will be paid after 20 years. The costs of servicing development are unending and will increase over time.

County Farmland Preservation Programs

Atlantic 609-345-6700
Burlington 609-265-5787
Camden 609-767-6299
Cape May 609-465-1086
Cumberland 609-453-2175
609-451-2800
Gloucester 609-863-6661
Hunterdon 908-788-1490
Mercer 609-989-6545

Middlesex 908-745-4014 Monmouth 908-431-7460 Morris 201-829-8120 Ocean 201-929-2054 Salem 609-769-4028/3108 Somerset 908-231-7000 ext. 7540 Sussex 201-579-0500 Warren 908-852-2579

Other Open Space Benefits

Reduced Public Costs for Flood Protection, Water Supply

Natural systems such as wetlands and floodplains provide water purification and help prevent floods. Wetlands naturally filter and store water and help maintain water supply by recharging groundwater. Undisturbed floodplains absorb high water. Other open space benefits include soil conservation, preservation of biological diversity, and air purification.

In the Passaic River Basin in New Jersey, local governments have allowed a high level of development along the river. Residents' safety is at risk, and the public cost for property damage claims has been tremendous. For example, in 1984 flood damage resulted in three drownings and nearly \$400 million in property damage. Proposed remedies to these problems range from a federal and state subsidized \$2.2 billion tunnel to less expensive property buy-out plans. To buy 774 homes in the most hazardous parts of the floodplain would cost between \$150 million (Passaic River Coalition estimate) and \$200 million (Green Acres Program estimate).¹¹

New York City Mayor Rudolph Guliani, in announcing a water rate increase of 1 to 2 percent that will allow the city to buy more lands in sensitive upstate watershed areas, said that the increase "is a tiny fraction of the \$8 billion that would have to be raised if increasing pollution forces New York City to build a filtration plant." The New York City Department of Environmental Protection is working to "minimize the introduction of pathogens and pollutants" into streams and reservoirs by preserving buffers in sensitive watershed lands.¹²

Protecting the Highlands in northwest New Jersey would insure the same kinds of benefits. Covering 750,000 acres from the Delaware River south of Phillipsburg northeast toward the Hudson River, the Highlands supply drinking water to half the state's residents. Although we are losing up to 10,000 acres a

year to suburban and commercial development, the major Highlands watersheds are relatively free of pollution. Sedimentation, increased runoff, metals and road salts that come with suburban development are serious threats to the water supply. The New Jersey Conservation Foundation found in 1992 that "the cost of constructing water treatment plants is likely to match or even exceed the cost of preserving watershed lands. . . . And the significant expense involved in operating such facilities is ongoing."¹³

Increased Property Values

Many studies have looked at changes in the value of property adjacent to open space. Although open space used for active recreation does not guarantee an increase in nearby property values, natural areas and greenways with trails usually do make neighboring houses more valuable. As property values increase, tax assessments eventually reflect the increased value, helping offset property tax loss from preserved open space. To find out whether your community assesses houses next to open space at a higher value, consult your tax assessor.¹⁴

A 1990 National Park Service publication reviewed dozens of studies on the economic effects of rivers, trails and greenways (linear open spaces that link recreational, cultural and natural areas). It found that "Property value increases are likely to be highest near those greenways that:

- highlight open space rather than highly developed facilities;
- have limited vehicular access, but some recreational access;
- have effective maintenance and security.¹⁵

For example, a survey in Minnesota found that 61 percent of the suburban landowners adjacent to a rail-trail noted a property value increase as a result of the trail. The National Park Service cites several studies where appraisers and real estate agents claimed that trails were a positive selling point for suburban residential property, hobby farms, farmland proposed for development, and some types of small town commercial property.¹⁶ And increased property values mean increased property tax revenues for local governments.

The National Park Service resource book provides detailed guidance on how to analyze the effect of open space on your community's property values.

A classic example of open space increasing adjacent property values is Manhattan's Central Park. Although New York City receives no property tax revenue from the Park, it gets a high level of property tax revenue from adjacent properties on the upper east and west sides of Manhattan, as well as social and recreational benefits for city residents.

In 1979, Newton, Massachussetts revived "betterment assessments," a 19th century tool, to help the municipality finance a recently acquired golf course. Owners of abutting property paid up to \$4,000 (payable over 20 years). The money raised by these assessments, when added to funds from a federal grant and funds raised by the sale of two small portions of the property for condominium development, enabled the town to preserve the land permanently.¹⁷

Increased revenues from tourism

Birding, hunting, fishing, hiking, camping and canoeing depend on forests and woodlands, wetlands, and

clean streams. Tourism in New Jersey generates \$4 billion in revenue, making it our second largest industry. While the shore areas generate the bulk of this, there is substantial tourism throughout the state. More than 12 million people visit New Jersey's state parks and natural areas each year, with an estimated economic impact of several billion dollars.¹⁸ The N.J. Division of Fish, Game and Wildlife found in 1991 that "Wildlife Recreation," such as fishing, hunting, and birding, results in annual retail sales of \$1.26 billion, generates over 32,000 jobs, and contributes state tax revenue of \$95 million.¹⁹

Reduced Borrowing Costs for Municipalities

Local governments borrow money to fund expensive capital improvements, such as schools, roads and bridges, water and sewer projects, by issuing long-term general obligation bonds. The cost of any debt is interest. The interest rate on a municipal bond is based on a score the municipality receives from municipal bond analysts, based on the government's level of debt and its ability to meet its financial obligations. Many suburban governments that had mushrooming growth in the 1980's have high debt levels in the 1990's.

For instance, on the outskirts of Washington, DC, Loudon County (VA), Prince William County (VA), and Howard County (Maryland), grew by over 50 percent in the 1980s. In Maryland and Virginia, county government regulates land use. During the building boom, these counties increased debt to provide services at pace with growth. But when the fast growth of the 1980s ended and property values began to drop, the ratio of debt service as a percent of revenue increased. Bond rating firms begin to get nervous about a local government's ability to manage its finances when debt servicing climbs above 10 percent of revenue. In all three counties, the ratio is expected to approach, or pass, 10 percent between 1995 and 2000, at which time their bond ratings may drop.²⁰

The Costs of Sprawl

A 1974 Real Estate Research Corporation study identifies economic costs of sprawl and lists a dozen other costs:

Environmental costs - air pollution, water pollution, noise, vegetation and wildlife, visual effects, water and energy consumption;

Personal Costs - use of discretionary time, psychic costs, travel time, traffic accidents, crime.²¹

Sprawl development spreads housing and jobs over large land areas, consuming forests and farmland six times faster than the population growth rate. According to the Regional Plan Association, population in the New York-New Jersey metropolitan area grew by only 2 percent between 1970 and 1995, yet we lost 30 percent of our fields and forests. Since 1950 New Jersey has lost more than half its farmland -- nearly 1 million acres. And the number of farms has dropped by two-thirds from 26,900 in 1950 to 9,000 in 1995.²²

And according to a 1992 Rutgers University's Center for Urban Policy Research (CUPR) study, New Jersey lost 25 percent of its tidal marshes between 1953 and 1973 and only 61 percent of its original wetlands remain.²³ The results are costly - -for citizens, towns and the state. A 1978 Tufts University economic study found that wetlands are worth between \$152,535 and \$190,009 per acre considering their value for flood prevention, pollution reduction, and recreational activities.²⁴ In today's dollars, wetlands are even more

valuable.

The Advantages of Development in Centers

In 1986 the New Jersey Legislature enacted the State Planning Act (N.J.S.A. 52:18A-196 <u>et seq.</u>) after recognizing that the social, environmental and fiscal impacts of sprawl development were diminishing the State's well- being. The Act established the State Planning Commission, charging it with developing the New Jersey State Development and Redevelopment Plan. The State Plan is a guide, designed to help New Jersey municipalities plan for growth without sprawl. It encourages new growth to occur in centers, compact forms of development with a core of residential, commercial and service development that accommodates pedestrians, automobiles and transit. For the State Plan to succeed, such concentrated forms of development must be surrounded by preserved open space and farmland and linked to an aggressive urban revitalization effort.

Development in centers can:

- Reduce municipal expenditures on sewers, water supply, roads;
- Direct development away from farmland and environmentally sensitive land;
- Leave more land open.

A town can realize savings by directing development near existing or planned centers-- places already (or planned to be) served with sewers, water lines, and other infrastructure.

Savings result from the ability to use excess capacity in sewers and school facilities and from needing fewer miles of roads, water, and sewer lines.

The Center for Urban Policy Research documented these savings in a 1992 study. The Center found that New Jersey could save:

- \$1.43 billion in infrastructure costs by channeling more future development near centers;
- nearly 60 percent of its undeveloped land by channeling development near existing centers;
- 83 percent of environmentally sensitive lands and 39 percent of farmland.²⁵

A 1995 Rutgers University review of three national studies for the tri-state Delaware Estuary Program confirms significant savings with center-oriented development versus sprawl. According to this study, planned growth saves 25 percent in road costs, 15 percent in water and sewer costs, 2 percent in fiscal impact, while consuming 43.5 percent less land.²⁶

The same study estimated the impacts of sprawl versus center- oriented development for 12 municipalities, including Chesterfield Township in Burlington County. By channelling its expected growth toward existing centers between 1995 to 2020, Chesterfield can save:

- 752 acres of land from development, including 643 acres of farmland and 139 acres of ecologically sensitive land. This land savings will occur while still allowing for 834 residential units (22 fewer units than with traditional sprawl), and 2.7 million square feet of non-residential development (292,000 fewer square feet than sprawl).
- \$6.8 million savings in local road costs and \$42,000 in state road costs.

- \$224,000 savings in waterworks costs.
- Costs for sewers would be \$281,000 higher because sprawl development in the town's environs would use private septic systems.²⁷

Preserving Open Space in Your Community

This Resource Paper aims to help environmental commissions and groups save open space by carefully documenting the economic benefits of preservation. Citizens can use this information to help sell the idea to local decision makers.

To save open space successfully, local advocates will need to work on many other tasks and prepare for an open space preservation campaign. ANJEC has many books and pamphlets on other aspects of open space protection: planning studies including natural resource and open space inventories, analyses of "build-out" showing the potential for development under current zoning, and preparation of open space or greenway plans.

A public education campaign helps develop support. Many towns conduct public opinion surveys, hold community meetings, and organize field trips. Picking a special site or goal can help focus a community's attention. Organizing a committee of community leaders is a key to success.

Open space advocates should be knowledgeable about the many methods for conservation of open space: conservation easements, greenway plans, outright purchase or donation, changes in zoning, farmland preservation programs.

Sources of funding for open space preservation include the state Green Acres program, which has spent almost \$1.5 billion on land preservation since its inception in 1961, county and local open space trusts funded through property taxes, the state farmland preservation program, and local bonding.

For additional information:

* For general guidance and sample studies and surveys, call the ANJEC Resource Center at 973-539-7547, fax 973-539-7713.

* Ask Green Acres (609-588-3450) for its guidelines and criteria.

* County Planning Departments can supply information on Farmland Preservation and county open space trusts:

County open space trusts:

Atlantic County 609-343-2229

Cape May County 609-465-1086

Gloucester County 609-863-6661

Mercer County 609-989-6545

Monmouth County 908-842-7000 x215

Morris County 201-829-8120

Somerset County 908-722-1200

Warren County 908-475-6531

* For background and guidance in establishing a municipal or county open space trust, ask the Trust for Public Land for a copy of its *Handbook for Public Financing of Open Space in New Jersey* (973-425-0360).

* For information on more than 80 land trusts and organizations in New Jersey active in land preservation, contact the New Jersey Conservation Foundation (908-234-1225).

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These additional references may be helpful to citizens and environmental commissions working on open space conservation projects. These publications are available for review at the ANJEC Resource Center, 300 Mendham Road, P.O. Box 157, Mendham, N.J., 07945. A few are available for purchase or loan. Call ANJEC at 973-539-7547 fax 973-539-7713 for further information.

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27. Ibid.

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