

## LETTER TO COUNTY ADMINISTRATOR MARC ELRICH

September 24, 2020

*Sent by email*

Dear Marc,

First, let me just say thank you for your leadership during this pandemic. I have followed your public statements and heard you a few times on the radio (pandemic and racial justice issues). I so appreciate your steady hand, reliance on the data and the inclusive lens through which so much of your policy is made. Thanks for maintaining this little slice of sanity in a world spiraling out of control.

That said, I am writing to urge you not to offer amendments and modifications to ZTA 20-01. This bill was a terrible short-sighted and even, I might say, reckless move on the sponsor's part. When it looked like it might pass, we too jumped in and tried to include language that would actually require the warm and fuzzy things they used to sell it to the public—community solar, pollinator habitats, agrivoltaics etc.

There is, however, momentum now in the other direction. We are fundamentally opposed to using farmland for commercial solar—farmland that is valuable for serving other ecosystem and security services now and in the years to come. So when we learned that Sidney Katz had spoken with enough farmers and experts to realize that this ZTA was fraught with inconsistencies and vague language, and that he is inclined to not hold a vote on it at the full council session on Sept 29, we realized this gives us the chance to argue for the right policies, not just beg for small concessions.

Here are our main arguments:

(1) Solar Energy produced in the Ag Reserve will not go to Montgomery County. SCA commissioned GDS, an electrical engineering consulting firm, to evaluate the feasibility of the ZTA. They found that only 4% (9MW) of the energy to be produced through this ZTA would stay in Montgomery County. The vast majority (231MW) would go out of county and out of state. Why would we sacrifice master plan-protected prime farmland in Mont Co so that people in Philadelphia can get solar energy??

(2) It is highly likely that there's enough land and optimal sites in the county to meet our needs without using needed farmland. Planners in Baltimore County recently hired a consulting firm (Chesapeake Conservancy) to evaluate that county's potential to produce the solar energy they needed to meet state goals. According to the study, Baltimore City and County offer nearly 33,806 acres of potential optimal solar sites, located on rooftops, parking lots, and degraded lands. An additional 3,400 acres of preferred ground-mounted sites could provide options for solar

energy development without displacing agriculture on prime farmland and minimizing environmental impacts by avoiding forested and ecologically sensitive lands.

Optimal solar energy sites in Baltimore City and County could generate over 22,789 GWh/yr of electricity from solar energy. That exceeds even the statewide solar carve-out goal of 9,000 GWh/yr. It's likely that only a portion of the pool of identified sites will prove to be viable development locations for a variety of reasons, ranging from property owner willingness, site feasibility, building suitability for rooftop installations, or other factors. However, just 8.6% of optimal sites, or 7.0% of optimal and preferred ground-mounted sites combined, would need to prove viable for Baltimore County and City to provide their fair share of the state's future solar carveout by 2030.

This analysis demonstrates that a sufficient number of optimal locations for solar energy siting exist to meet the state's renewable energy goals. Baltimore County is a very good comparison to MoCo. A similar analysis for MoCo should be done. But in the meantime, this is compelling enough to strongly argue against opening up our farmland unnecessarily for industry.

(3) Siting 150-180 commercial solar facilities around the Ag Reserve—as the ZTA would allow—could be the Reserve's death knell. This land has been zoned for just farming for a reason. Economically, a farmer near Washington cannot compete with industry. Rental rates will skyrocket because solar businesses will flood into the Ag Reserve looking to scarf up land that is priced way below industrially-zoned market rates.

(4) MoCo farmland will likely become increasingly essential to feeding other areas of the state and nation as the climate heats up. Recent climate modeling by NASA and others shows severe drought coming in the next 5 years to the Central Valley and spreading across the South and Midwest. Over the next few decades, our area will be one that may still have robust food production. We must preserve this arable land for future food production and carbon sequestration.

(5) Overwhelmingly, MoCo residents oppose the proposed ZTA. The Council has received over 800 letters; 72% are opposed. The Farm Bureau, NRCS and Soil Conservation District all oppose. Montgomery Ag Producers also opposes.

Of all the environmental groups in the county only the local chapters of Sierra Club and Poolesville Green favor the proposal; both of their boards are divided on the issue but their presidents prevailed.

Please stand firm and oppose the ZTA to protect the Agricultural Reserve's prime farmland. To truly provide community solar for down county, low-income Montgomery County residents, and not send the solar energy out of state,

installations must be sited near the receivers on land that is optimal to serve the needs of all county residents, not the needs of commercial solar developers.

Developers have been trying to break the Ag Reserve Master Plan for decades. This ZTA is the latest in a long line of proposals that would enrich them by sacrificing farm and open land for industrial or commercial use. First it was the proposed “up-county industrial zone,” then a highway and bridge, then a housing development. And last year, another (Reimer-sponsored) ZTA passed that allows investors to build commercial breweries on farmland—without growing the crops anywhere nearby. Now we have Big Solar targeted our farmland.

Please don’t enable the County Council to open the award-winning Ag Reserve to industrial development. Let’s maximize the benefit of solar energy for Montgomery County residents on marginal and already compromised or developed land and preserve our prime farmland for food production and carbon sequestration. The AR can be a vital part of the response to climate change.

“Behind-the-meter” solar should always be our first priority. It requires little infrastructure and power losses are miniscule in transmission. If Baltimore County, New Jersey and Massachusetts can do this, I know we can. We just need your strong support and leadership.

Thanks again,

Lauren  
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