



SIERRA CLUB
MONTGOMERY COUNTY, MD

To
The Montgomery County Council
100 Maryland Avenue
Rockville, MD 20850

July 8, 2020

Reg: Zoning Text Amendment (ZTA) 20-01
Position: Support with Amendments

Dear County Council President Katz and Council Members,

On behalf of the Maryland Sierra Club's Montgomery County Group, I am writing to reaffirm our strong support for proposed Zoning Text Amendment 20-01, which will allow a very limited amount of land in our Agricultural Reserve to be used for small solar projects that will provide shared solar power to our community. Our position derives from Sierra Club's work over the past five years with multiple county governments, the Maryland Association of Counties, the Public Services Commission (including the Working Group that oversees implementation of the state's community solar pilot program), the Maryland Farm Bureau, the state legislature's Environment and Transportation Committee, other conservation and land preservation organizations, farmers, and solar developers.

As a conservation organization, Sierra Club absolutely appreciates and respects the importance of agricultural land. At the same time, we – like you – are aware of the increasing impact of climate change, including to agriculture. We are therefore supportive of the county's goals to urgently reduce the carbon pollution driving climate disruption. Replacing fossil fuel-generated electricity with clean renewable sources is an essential action to achieve that carbon reduction.

To achieve this urgent goal, the county will need to build substantial additional solar capacity, beginning now. Our experience indicates that this can be done in a balanced, win-win way, and that ZTA 20-01 is consistent with this approach. Our reasoning is laid out in detail in our written testimony, submitted to the Council on February 28th and available at the following link: [Sierra Club Testimony on ZTA 20-01](#). Key points of that testimony are –

- **Montgomery County can't build all the solar energy generation it needs on rooftops, parking lots, brownfields, or commercial/industrial property.**
 - Based on the U.S. Dept. of Energy's National Renewable Energy Laboratory's LIDAR-based assessment of Maryland's capacity for rooftop solar, it is estimated that the county can build less than half of its share of required solar capacity on rooftops.
 - Because solar arrays last for at least 20 years, the cost-effective time to build rooftop solar is when a roof is being built or replaced; this means it may take as much as two decades to achieve full rooftop solar potential.
 - Rooftop solar arrays meet only part of the electricity need of those living or working under the roof; while this takes demand off the grid, it means that getting solar-generated electricity for additional homes and businesses will require building solar on the ground.



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- The amount of added capacity for solar on parking lots, parking garages is relatively limited, and constrained by additional structural, safety, and engineering costs; like rooftop solar, such solar arrays also serve part of the need of the property owner, and generally aren't suppliers of other parts of the community.
 - A recent in-depth study of all EPA-identified brownfields with solar development potential in Maryland found no viable sites in Montgomery County; there are a small number of landfills, some of which the county is already using for solar development.
 - The small solar projects that can be built in Maryland have a narrow margin of profitability; the cost of commercial or industrial land in our county – generally from \$100,000 to \$1 million per acre – means building solar projects on such land is not economically feasible.
- **These limitations mean the county needs a rational approach to solar development on agricultural land.**
- While Sierra Club supports maximizing all other potential sites for solar development, more than half the solar required by the county will need to be built on the ground.
 - The urgent need to replace fossil fuel-generated electricity with clean renewable sources means that ground-based solar development can't wait until after all rooftop and other sites are used – ground-based solar development must be simultaneous, not sequential.
 - The 1,800 acre cap set in the proposed ZTA would amount to just under 2% of the total 93,000 acres in the Agricultural Reserve.
- **Ground-based solar development has unique benefits**
- USDA finds that 2/3rds of farmers in the county are age 55 or older, and many working farms face economic uncertainty and constant stress – lease of the small part of their acreage needed for the small solar projects specified in the ZTA can provide farmers with secure long-term income.
 - Unlike residential or commercial development, solar arrays do not take the underlying land away permanently.
 - Also unlike residential or commercial development, solar projects do not require county investment in additional roads, sewers, services, or schools, and generate no noise or pollution.
 - The use of pollinator-friendly planting in solar arrays can actually enhance productivity of surrounding farms; other appropriate agricultural practices can be co-located with solar arrays.

Again, more detail on these points is available in our original written testimony (link above). We will also be available at the Council's committee work session on July 9th to participate in the discussion. We appreciate the Council's interest in this issue and its commitment to real action to make our county a leader in responding to the threat of climate change.

Respectfully,

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