

To: Members of the Governor's Task Force on Renewable Energy Development and Siting  
From: Advocates for Herring Bay<sup>1</sup>  
Date: November 12, 2019  
Re: Economic incentives for optimizing the siting of solar facilities

The Advocates for Herring Bay would like to thank the Task Force for making your deliberations open to the public and welcoming citizen input. In support of your efforts, we respectfully offer the following views and recommendations on incentives for optimizing the siting of solar facilities.

***Our perspective:*** Maryland is fortunate to have numerous options for reducing its carbon dioxide emissions, ranging from technology-based solutions like renewable energy to natural solutions like forest sequestration. In our view, these options should not be traded against each other. Instead, we support taking a holistic approach, one that will maximize Maryland's carbon sequestration potential while decarbonizing the electricity grid with renewable energy options that can be installed on less environmentally valuable surfaces.

***Policy concern:*** One promising siting strategy is to install solar arrays on surfaces that have little or no carbon-sequestration potential, such as impervious surfaces, landfills, reclaimed mines, and man-made bodies of water. However, leveraging impervious and previously developed surfaces is currently less profitable in Maryland than greenfield projects on agricultural or forested lands, in part because current pricing policies overlook the ecological and sequestration benefits of natural resources. Ensuring that Maryland's in-state solar generation reaches its full potential to reduce greenhouse gases will require siting-based economic incentives that will spur installations on alternative surfaces.

***Policy recommendation:*** Economic incentives need to be in place soon if the state hopes to have a diverse supply of in-state solar generation by 2028. We urge the Task Force to recommend that the state immediately initiate a study of economic incentives that would be effective in expanding the use of alternative surfaces. Other states are already realizing the benefits of siting-based incentives. In Massachusetts, for example, providing price "adders" for installations on non-greenfield surfaces led to nearly 20 percent of the proposed solar capacity being sited on preferred surfaces.

This study on economic incentives should focus on three principal objectives:

1. Identify the types and value of siting-based incentives that would encourage installations of solar facilities on impervious and other previously developed surfaces in Maryland;
2. Ensure that such financial incentives provide predictable, long-term economic support for projects on preferred sites. While grants, loans, and other existing programs are helpful, they are limited in scope and effectiveness.
3. Build on the experience of other states. Many other states have begun this process, and some have begun to see measurable results.

Thank you for considering our views. If you have any questions about our recommendations, please contact Kathy Gramp at [herringbay@gmail.com](mailto:herringbay@gmail.com).

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<sup>1</sup> The Advocates for Herring Bay, Inc. (AHB) is a community-based environmental group located in southern Anne Arundel County. Information about our organization can be found on our website [www.herringbay.org](http://www.herringbay.org)