The Maryland-National Capital Park and Planning Commission Prince George's County Planning Department Countywide Planning Division 301-952-3650



Note: Staff reports can be accessed at www.paplanning.org/Planning Home.htm

**Mandatory Referral** 

MR-1522F

Vialitatory Neterral		WIK-13221
Application	General Data	
Project Name: Boyd Farm Solar Project	Planning Board Hearing Date:	4/28/16
The state of the s	Date Accepted:	3/8/16
Location: 11504 Croom Road Upper Marlboro, Maryland 20772	Mandatory Action Timeframe:	60-Day Review
Applicant/Address: Montgomery County Public Schools 850 Hungerford Drive Rockville, MD 20850  Property Owner: Theodore and Ergibe A. Boyd	Acreage:	10.9 acres
	Zone:	O-S
	Planning Area:	86A/Croom-Naylor
	General Plan Tier:	Rural and Agricultural Area
	Council District:	District 9
	Adjacent Municipality:	Upper Marlboro

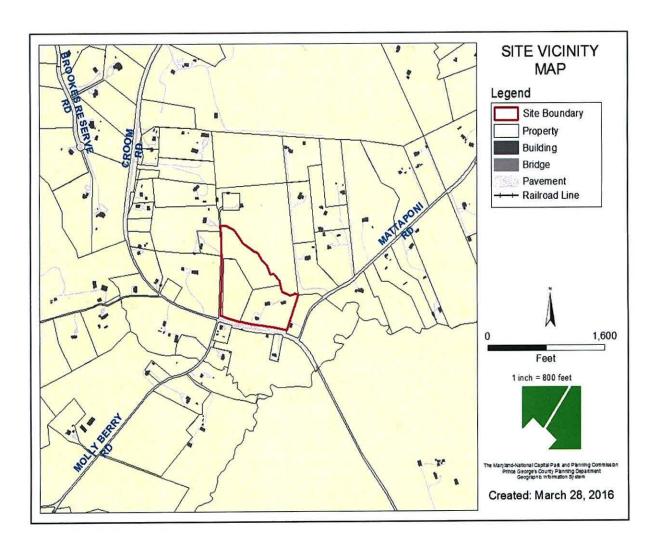
Purpose of Application	Notice Date
To construct a ground-mounted solar facility on leased property for the purpose of generating electricity	Acceptance Mailing: April 1, 2016

Staff Recommendation	Staff Reviewer:
Transmit Staff Report to:	Fatimah Hasan
Mr. Sean Gallagher Assistant Director Department of Facilities Management Montgomery County Public Schools 200 Gude Drive Rockville, MD 20850	<b>Phone Number:</b> 301-952-3580
	Email: Fatimah.Hasan@ppd.mncppc.org

#### MR-1522F Staff Report – Boyd Land Solar Project

#### PROJECT BACKGROUND

The Land Use Article §20-301 through 305 of the Maryland Annotated Code requires the Planning Board to review public construction projects for all federal, state, county and municipal governments, and publicly and privately owned utilities through the Mandatory Referral (MR) review process. The proposed construction of a photovoltaic solar array is being reviewed as part of the MR review process pursuant to Maryland Annotated Code of the Prince George's County Zoning Ordinance. The proposed photovoltaic solar array must be referred to and reviewed by The Maryland-National Capital Park and Planning Commission. The Public Service Commission's Aggregated Net Metering program specifies that only municipal, non-profit, or agricultural entities can benefit from sale of solar electricity from offsite private properties. Therefore, this project is pursuing approval via Prince George's County's Mandatory Referral review process.



Map 1 - Project Site Vicinity

#### EXISTING CONDITIONS

The proposed site is on the north side of Croom Road between Molly Berry Road and Mattaponi Road. In March of 2015, SunEdison, Inc. and Standard Solar, Inc. received exclusive rights to sell solar energy generated on private properties to the Montgomery County Board of Education (MCPS). In June of 2015, MCPS executed an agreement with SunEdison, Inc. to purchase electricity from an off-site solar system for 20 years with SunEdison and its partner, Standard Solar, bearing all capital costs associated with project construction. Subsequently, an Option to Lease agreement was executed between the owners of three contiguous properties, Theodore and Ergibe Boyd, and SunEdison, Inc. (the leaseholder), for the construction and operation of a photovoltaic solar array at 11504 Croom Road, Upper Marlboro, Maryland which encompasses a portion of the Star Spangled Banner Scenic Byway. SunEdison, Inc. has agreed to retain ownership of the solar electrical equipment and responsibility for its operation and maintenance while selling the power generated to MCPS, thus providing a net savings for the Montgomery County School System. There are existing trees that provide visual screening to landowners to the north, west, and east of the proposed facility. There are several residential structures and agricultural support structures clustered on the southeast area of the site.

#### PROJECT SUMMARY

The proposed project consists of constructing a photovoltaic solar array on the Boyd property for the purpose of selling the electricity generated for the duration of a 27-year lease. The electric power would be sold to MCPS for 20 years, and SunEdison would contract with another qualifying Maryland municipal entity for the remaining seven years of the lease. The proposed solar array will include ground-mounted panels and electrical equipment, enclosed by a locked six-foot-high chain link fence, with an access drive from an existing driveway located adjacent to the western property line. At the conclusion of the 27-year lease, SunEdison will remove the equipment and restore the site to its current condition at its own cost. The proposed temporary site that is the subject of this review is approximately 10.9 acres in size and is located in the Rural and Agricultural Area of the County. The project required a full MR review due to the fact that it consists of new construction of a solar array on an open field that is proposed to be the temporary site for generating electricity. The project proposes no tree cutting or trimming.

#### STAFF RECOMMENDATIONS

The proposed solar array project underwent a careful review by Planning Department staff, resulting in the following recommendations:

- Additional information is necessary for a full evaluation of the viewshed impacts. It is questioned
  whether the placement of a solar array in a cultural landscape of national significance is appropriate.
  Staff suggests that the applicant make every effort to consider a site outside of the scenic and historic
  viewshed, and not a site which is eligible for agricultural preservation.
- The County has several agricultural and land-based preservation programs for which this site would be eligible, which would allow it to remain as a rural agriculture landscape. There are also many old sand and gravel mines located throughout the rural area of the County, and outside of the viewshed of scenic and historic roads, which are not suited for agricultural purposes now or in the future, which are well adapted to these types of solar array projects.

Should the project proceed at this location, staff has the following recommendations:

 It is recommended that a Natural Resources Inventory (NRI), grading plan and stormwater management concept plan be submitted to evaluate the potential impacts. A review of this information will also be used to determine whether the project requires a Type 2 Tree Conservation Plan or qualifies for a Letter of Exemption.

- A Natural Resources Inventory Plan or Equivalency Letter will be required for Stormwater Management Concept approval for the proposed project.
- The site is greater than 40,000 square feet in area, contains more than 10,000 square feet of woodland and is subject to the Woodland and Wildlife Habitat Conservation Ordinance (WCO).
- O Because a grading permit will be required based on the extent of grading proposed (over 5,000 square feet of ground disturbance) compliance with the WCO at the time of permitting will require either a Type 2 Tree Conservation Plan or a Letter of Exemption.
- The project may be eligible for a Letter of Exemption from the Woodland Conservation Ordinance if the plan demonstrates the removal of less than 20,000 square feet of woodlands under the governmental projects exemption, but will require submittal of a Forest Stand Delineation (FSD) plan to confirm, prior to issuance.
- It is recommended that the natural and environmental features on the site, such as streams and 100-foot-wide stream buffers, which GIS analysis indicates will be impacted, be preserved to the fullest extent possible, as well as conservation and floodplain easements.
- The 2010 Prince George's County Landscape Manual includes specific requirements for the Buffering of Special Roads which are included in Section 4.6. The site would usually be subject to Buffering Development from Special Roadways requirements found in the Landscape Manual (shown below, pages 70-71). This section includes requirements for at least a 40-foot-wide buffer, planted with 80 plant units per 100 linear feet (not a high impact use), the typical requirement along a developing site frontage on a designated scenic and historic road in this area of the County.
  - (A) When a property supporting any use has frontage on a special roadway, a buffer area shall be provided adjacent to the entire right-of-way, excluding driveway openings. All plant material required by this section shall be located outside of public utility easements adjacent to the right-of-way. The width of the buffer area and the plant material required to be planted with the buffer area shall be as follows:
    - (iii) Rural Tier-Designated historic roads, designated scenic roads, Maryland Statedesignated byways, and the Suitland and Baltimore-Washington Parkway
      - A minimum forty (40) foot wide buffer to be planted with a minimum of one hundred sixty (160) plant units per one hundred (100) linear feet of frontage, excluding driveways, for high impact use only. The buffering and planting requirements for all other uses (not high impact uses) shall be a minimum of a forty foot-wide buffer to be planted with a minimum of eighty plant units. One hundred (100) percent of the plant units provided within the buffer shall be native species that shall be randomly spaced to mimic local forest communities.
  - (B) When existing noninvasive trees are located within the buffer, preservation of the trees in general is preferred to the planting of new trees. When existing vegetation is located in only part of the buffer, the number of plant units required to be planted may be reduced in proportion to the percentage of the area of the buffer occupied by existing vegetation. Any invasive species should be removed from the buffer area.

- (C) The buffering and planting requirements of Section 4.6(c)(2)(iii) may be reduced if viewshed studies indicate, at the time of a detailed site plan, specific design plan, or special exception (or if none of these are required through an application for alternative compliance) that the alternative landscape design will conserve and enhance the special roadway with regard to the natural and/or cultural features of the surrounding area.
- It is recommended that, prior to the issuance of permits, the applicant work with the Planning Department on an in-depth assessment of the proposed project's visual impact to ensure that it does not negatively impact the scenic and historic viewshed and visual character of Croom Road, also part of the Star Spangled Banner Scenic Byway. The quantity of plant units and their size required under the standards of the 2010 *Prince George's County Landscape Manual* are insufficient to "buffer" a solar array of the size and location proposed to be placed on an open slope with full visibility from the roadway. Creating some sort of foreground would be necessary, which would require a setback of the solar arrays from the roadway. Section 4.6 of the Landscape Manual would require a minimum of a 40 foot buffer, but as structures, it is recommended that the solar arrays be set back a minimum of the front restriction line in the R-A zone (50 foot required setback) or consistent with the setback of other accessory structures fronting on this section of Croom Road.
- The proposed solar arrays should be situated so that they are minimally visible. It is recommended that the design of the frontage of this property on Croom Road, including plantings, fence type and proximity of the solar facility to the roadway, be carefully considered in order to not detract from the scenic and historic nature of this rural road. The applicant should consider a more attractive alternative to the proposed chain link fence around the entire perimeter of the complex. Avoiding the use of corrugated metal or fiberglass, sheet metal, chain link with slats and mesh fencing is strongly suggested. If fencing is required along the street frontage, an attractive style and material consistent with the rural character of the roadway should be considered, or at the least, a black-vinyl coated chain link fence with landscaping in front of it, within a minimum of 40-foot-wide planting strip. Furthermore, the planting should follow the standards set forth in the Landscape Manual Section 4.6(c)(2)(A)(iii) regarding native species and natural spacing.

#### PROJECT LOCATION

The proposed solar array field is located in District 9 at 11504 Croom Road, Upper Marlboro, Maryland, outside the Growth Boundary in the Rural and Agricultural Area of the County, as designated by the 2014 *Plan Prince George's 2035 Approved General Plan*. The location is described as having significant natural and agricultural resources that are best suited for low-density residential development on well and septic, agricultural activity, and forest preservation. The project would be internal to an existing agriculturally assessed property, and surrounded by other agricultural and residential properties. The surrounding properties are largely for agricultural and residential uses. The general location is shown on Map 2. It is in the O-S Zone, as shown on Map 3, a zone which includes areas of low-intensity, five-acre residential lots, which promote the economic use and conservation of land for agriculture and natural resource use.

Map 2 - Proposed Boyd Farm Solar Project - General Location Map

#### PROJECT DESCRIPTION, SCHEDULE AND FUNDING

Montgomery County has entered into an agreement with Standard Solar, Inc., and SunEdison, Inc., to construct a photovoltaic solar array on the Boyd properties on Croom Road in Upper Marlboro. The panels and electrical equipment described will be enclosed by a locked six foot chain link fence. SunEdison will retain ownership of the solar electrical equipment and responsibility for its operation and maintenance for 27 years, and will remove the equipment and restore the site to its current condition at its own cost.

Although the photovoltaic solar array will be visible from Croom Road, the project team anticipates no adverse effects on driving conditions as a result of the solar facility. The system was designed to avoid interference with existing easements, rights-of-way, and deed restrictions on the property as recorded with Prince George's County. Mapped streams and wetlands are not located within the proximity of the solar project and no tree clearing is planned, hence no impact to streams, wetlands, or forests are expected.

The Maryland Amphibian and Reptile Atlas (MARA) identifies forest areas bordering the project as areas that may contain amphibian and reptile species of interest; however, because the project is proposed to be sited on existing farmland and no tree clearing is planned, adverse impacts to these species are not anticipated.

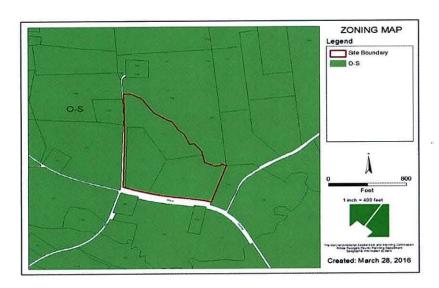
The proposed solar panels would be set back 20 feet from the proposed fence, which runs along the existing treeline to the north of the property. The current plan is for the 400 feet of fencing to begin 30 feet from the property line and 70 feet north of Croom Road. Thus the solar panels would be at least 90 feet from the road and may be moved further back to accommodate appropriate setbacks from platted easements at the time of final design. Trees 80-100 feet in height at the north edge of the property provide buffer for the site's northern edge. Plant screens of deciduous shrubs are anticipated with the slatted fence inserts for the chain link fence. Varieties of shrubs would include forsythia or spicebush, which stand 6 feet tall and can grow to 10 feet. The applicant plans to submit a landscape plan later that would be compliant with the Prince George's County Landscape Manual.

The solar array would consist of 8,208 polysilicon modules or panels mounted on steel racking approximately 6-8.5 feet in height, secured into the ground using driven piles. The facility would include two central inverters, an AC accumulation panel to consolidate the electric output from each inverter, and one 2000kVA transformer to facilitate electricity production on an "equipment pad" area located along the western border of the array adjacent to the north-south line of trees. In addition, 490 feet of electrical conduit would be installed underground to connect the array to the utility's existing electrical service at the point of interconnection (POI), located to the south along Croom Road. Potomac Electric Power Company (PEPCO) has confirmed the feasibility of the electrical design of the solar facility within the local electrical grid and approved the project for installation. Construction is scheduled between sunrise and sunset. The proposed 1.98 MW AC solar array was designed by Standard Solar, Inc., and funding is provided through SunEdison, Inc.

The proposed solar project is expected to be open and operational by October-December of 2016. The current proposed schedule is as follows, though subject to change pending final design and commitments from financial sponsors. Construction will last 8-12 weeks from initial mobilization on site:

Approval of Building Permit: Use and Occupancy Certification: Grand Opening: August, 2016 September, 2016 October – December, 2016

Map 3 - Existing Zoning Map



#### ANALYSIS OF PROJECT IMPACT AREAS

The Maryland-National Capital Park and Planning Commission, Prince George's County Planning Department staff has reviewed the proposed ground-mounted facility and provided the following comments:

#### 1. ENVIRONMENTAL ASSESSMENT

A review of the information available indicates that streams and stream buffers are found to occur along the northern boundary of the subject property. The site consists of a southeast facing slope with soils in the Croom-Marr, Dodon, and Marr-Dodon complexes. No Marlboro Clays are found to occur in the vicinity of the property. According to information obtained from the Maryland Department of Natural Resources Natural Heritage Program, there are no rare, threatened, or endangered species found to occur on this property or adjacent properties.

Croom Road is a County designated scenic and historic road, a state and federally designated Scenic Byway (Star-Spangled Banner Scenic Byway) and a federally designated national historic trail (Star Spangled Banner National Historic Trail). The property is located within the Rural and Agricultural Lands Area of the Growth Policy Map and Environmental Strategy Area 3 (formerly the Rural Tier) of the Regulated Environmental Protection Areas Map as designated by Plan Prince George's 2035 Approved General Plan. The site is located in the Middle Patuxent subwatershed of the Patuxent River. According to the 2005 Approved Countywide Green Infrastructure Plan, the site includes Evaluation Areas along the eastern portion of the property. The property is located in the Priority Preservation Area as designated in the 2012 Adopted and Approved Priority Preservation Area Functional Master Plan and the Lower Patuxent Rural Legacy Area.

#### **Environmental Review**

#### Natural Resources Inventory/Existing Conditions:

The site does not have a Natural Resources Inventory. A Natural Resources Inventory Plan or Equivalency Letter will be required for Stormwater Management Concept approval for the proposed project.

An Existing Site Conditions statement or plan was not provided by the applicant for the site. Exhibits were submitted based on MERLIN mapping information for specific site information, but they were not as detailed as the information provided on the PGATLAS.com web-based mapping available on-line for Prince George's County site. There is an existing "floodplain and conservation easement" shown on record plat NLP 148-020.

#### **Woodland Conservation:**

The site is greater than 40,000 square feet in area and contains more than 10,000 square feet of woodlands, so is subject to the Woodland and Wildlife Habitat Conservation Ordinance (WCO).

The proposed site plan did not include a grading plan. Because a grading permit will be required based on the extent of grading proposed (over 5,000 square feet of ground disturbance) compliance with the Woodland Conservation Ordinance at time of permitting will require either a Type 2 Tree Conservation Plan or a Letter of Exemption.

The project may be eligible for a Letter of Exemption from the Woodland Conservation Ordinance if the plan demonstrates the removal of less than 20,000 square feet of woodlands under the governmental projects exemption, but will require submittal of a Forest Stand Delineation (FSD) plan to confirm, prior to issuance.

#### **Regulated Environmental Features:**

As previously noted, the site contains streams and stream buffers, and existing conservation and floodplain easements. It is not clear if the 100-foot wide stream buffers will be impacted. These features should be preserved to the fullest extent possible (See Map 4).

MR-1522F: Adjacent Streams with 100-foot Buffers

Map 4 – Impact on Adjacent Streams

#### Special Roadways (Scenic Byways, Designated Historic and Scenic Roads):

Proposed fence

Project site property

As previously noted Croom Road is a state and nationally designated Scenic Byway, and a locally designated Historic Road, and views from the roadway will be an important consideration. When this was discussed at the pre-application meeting, it was indicated that further information was needed with regard to the height of any proposed mounting structure and possibly three-dimension digital modeling to an evaluation of visual impacts.

Stream with 100-foot buffer

The current proposal shows a larger array of over 10-acres located on a prominent south facing slope overlooking the special roadway. There is no existing buffer along the road, and the cultural landscape is of a large agricultural field fronting along a ridgeline just north of Mattaponi Creek. The subject property has almost 1000 linear feet of frontage along Croom Road and the cultural landscape exists in a highly agricultural state on both sides of the roadway from West End Farms to the north, to Hill Road to the south, a distance of almost four miles and is one of the most pristine areas along the Lower Patuxent Scenic Byway Corridor. Given that the solar panels may be a maximum height of 8.5 feet, a preliminary viewshed analysis was done to determine the visual impact as shown in Map 5.

Viewshed Analysis for 8.5' tall Solar Panels on Boyd's Farm
Solar Panels visible

Map 5 – Visual Impact

### Located in the State-Recognized Lower Patuxent Rural Legacy Area and Priority Preservation Area:

The site is located in areas that were designated as a priority land preservation and conservation area. It is acknowledged that the use is temporary for 27 years, and that the land can be returned to agricultural uses after the completion of the lease if that is the desire of the owner. However, taking limited agricultural lands out of agricultural use for a lengthy period does not support the need to maintain sufficient land area to support an agricultural economy in Prince George's County, which in the future would be difficult to re-establish if local agriculture is being supported.

Visibility from Croom Road and Visual Impacts to the National Scenic Byway and Historic Trail: The elevation at the lower southeast corner of the property is 60 feet mean sea level (MSL). The elevation of the property at the northwest corner is 134 feet MSL, an elevation change of approximately 74 feet over a cross sectional line joining the two points. The location of the array is highly visible from a vehicle or bicycle traveling along Croom Road, and may be very difficult to buffer. The structure is proposed at a higher elevation overlooking the roadway, and in an area where there is no existing visual buffering.

It should be further noted that during the recent bicentennial of the War of 1812, which concluded in 2014, considerable state and local resources were invested in developing the tourism potential of the Star Spangled Banner Scenic Byway and Historic Trail, and the unique role that Maryland and Prince George's County played.

It is recommended that the applicant work with the Planning Department to ensure that the final design of the proposed project minimizes negative impacts to scenic viewsheds along Croom Road. While acknowledging that the impacts are proposed as temporary for 27 years, the negative impact on the tourism investments and improvements that have been made could be significant and long lasting.

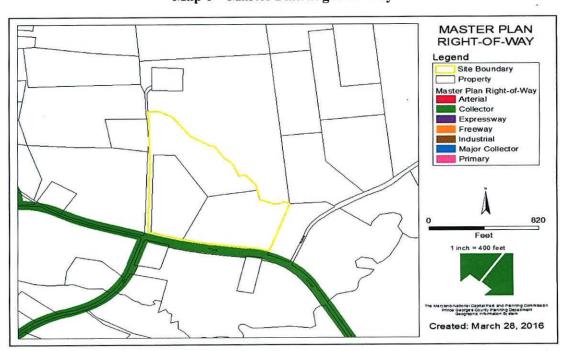
#### Conclusion

The size and location of the project now proposed are a substantial concern. Compatibility with the "Rural and Agricultural Lands" character of the neighborhood, and the numerous scenic and historic designations indicate the high visual quality of the Croom Road corridor. While recognizing the benefits of clean energy alternatives and supporting the placement of solar arrays in locations that do not damage designed scenic and historic resources, it is questioned whether the placement of a solar array in a cultural landscape of national significance is appropriate. Additional information is necessary for a full evaluation of the viewshed impacts and possible mitigation through the necessary environmental review and permitting processes.

The County has several agricultural and land based preservation programs for which this site would be eligible, which would allow it to remain as a rural agriculture landscape. There are also many old sand and gravel mines located throughout the rural area of the County, and outside of the viewshed of scenic and historic roads which are not suited for agricultural purposes, now or in the future, which are well adapted to these types of projects.

#### 2. TRANSPORTATION ASSESSMENT

The proposed solar project is located adjacent to Croom Road (MD 382), a state road, a master planned collector (see Map 6), and a state and nationally designated Scenic Byway and Historic Trail, as well as a locally designated scenic and historic road, with no existing buffer along the frontage. Given that most of the property sits at a higher elevation than the road, the facility is expected to be highly visible from this special roadway.



Map 6 - Master Plan Right-of-Way

#### **Transportation Projects and Planned Facilities:**

There are no planned transportation or transit facilities adjacent to or abutting the property. It is approximately 5.5 miles from the Croom Road/US 301 intersection.

#### 3. HISTORIC PRESERVATION/ARCHEOLOGY

The proposed project will have no impact on any known Prince George's County Historic Sites, Resources, or Archeological Resources. No historic properties have been identified on or adjacent to the property.

#### 4. ECONOMIC ASSESSMENT

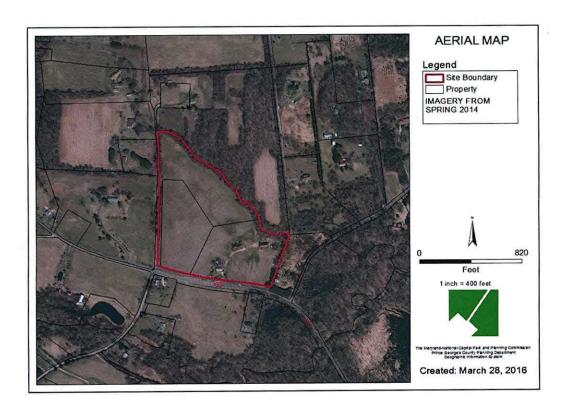
There are no comments on economic impacts of the proposed project in the immediate neighborhood and the County as a whole.

#### 5. CONSISTENCY WITH DEVELOPMENT/REGULATORY STANDARDS

The property is surrounded by agricultural and residential uses that are zoned O-S, a zone which includes areas of low-intensity, five-acre residential lots, and which promotes the economic use and conservation of land for agriculture and natural resource use as shown in Map 7 - Aerial Map.

#### Landscaping/Urban Design:

There is no existing buffer along the property frontage. It appears as though the proposed solar arrays would be minimally visible and have little impact on those properties to the northeast and west given the existing trees. Per the 2010 *Prince George's County Landscape Manual*, there are requirements for buffering and planting along the frontage of a developing site that is located on a designated scenic and historic road.



Map 7 - Aerial Map

#### 6. CONSISTENCY WITH APPROVED PLANS

The application is consistent with the 2013 Approved Subregion 6 Master Plan policies for rural development with regard to the Economic Development Chapter Policy 2, Strategy 8 on page 148: "Investigate opportunities for promoting green industries."

#### 7. EXISTING PUBLIC FACILITIES

Map 8 shows the locations of existing public facilities. The police services are provided by the Prince George's Police Department, District V, located at 6707 Groveton Drive in Clinton, Maryland. The proposed project is served by Upper Marlboro Fire/EMS Co. 845, a first due response station, with a maximum of seven minutes travel time, which is located at 7710 Croom Road. The station is equipped with two engines, one ambulance, one Breathing Air Unit and one Hazmat. The 2008 Approved Water and Sewer Plan places this property in Water and Sewer Category 6, Individual System.

MR-1522F: Boyd Farm Solar Project

Public Facilities

MR-1522F Site

MR-1522F Site

MR-1522F Site

MR-1522F Site

Fire Station

Fire Station

PGCPD Police Station

Public School

Mattapori
Beneritary
School

Mattapori
Beneritary
School

Mattapori
District

Research

Map 8 - Public Facilities

#### 8. COMMUNITY OUTREACH

Notification letters were mailed to adjoining property owners and civic associations informing them of the proposed project and Planning Board hearing date (see Map 9). Staff did not receive any inquiries from any adjacent property owners inquiring about impacts on their properties.

MR-1522F: Boyd Farm Solar Project

Adjacent Properties

MR-1522F Site

Property Adjacent to Site

O 400 800 1

Feet Casted by 18-0-071 AUGUSTA

Map 9 - Adjacent Properties

STAFF COMMENTS

Countywide Planning Division Environmental Planning Section 14741 Governor Oden Bowie Drive Upper Marlboro, Maryland 20772 TTY: (301) 952-4366 www.mncppc.org/pgco

March 21, 2016

TO:

Fatimah Hasan, Planner Coordinator, Special Projects Section

VIA:

Katina Shoulars, Planning Supervisor, Environmental Planning Section

FROM:

Kim Finch, Planner Coordinator, Environmental Planning Section

SUBJECT:

MR-1522F Boyd Farm Solar Array Project

11560 Croom Road

Lots 1 through 33, Holland's Addition to Mattaponi Acres Subdivision

The Environmental Planning Section (EPS) has completed its review for MR-1522F, for the proposed Boyd Farm Solar Array Project to be located on three adjacent privately owned lots located 11560 Croom Road, Upper Marlboro, Maryland, based on materials received electronically by the Countywide Planning Division on March 14, 2016 and provides the following comments:

#### Background

A preliminary pre-acceptance meeting was held with the applicant on this project on March 8, 2015. At that time materials were provided which indicated the construction of one solar array on the lots located on the north side of Croom Road.

The proposal submitted for full review is the same configuration and size submitted at the time of preapplication, and proposes a solar array with a footprint of approximately 10.9 acres according to the project description. The solar array is being built on leased private property for the purpose of selling electricity under the Public Service Commission's (PSC) "Aggregated Net Metering" policy, which allows the sale of clean energy generated from certain systems to qualifying municipal entities. The proposed customer for the electricity is Montgomery County Public Schools or another qualifying Maryland municipal entity under a 27-year lease. Montgomery County Public Schools (MCPS) has contracted to purchase power from the proposed system for 20 years.

#### **Site Description**

The subject property consists of three lots totaling 10.9 acres located on the north side of Croom Road between Molly Berry Road and Mattaponi Road, and is zoned O-S. A review of the information available indicates that streams and stream buffers are found to occur along the northern boundary of the subject property. The site consists of a southeast facing slope with soils in the Croom-Marr, Dodon, and Marr-Dodon complexes. The site is for the most part in agricultural use, is agriculturally assessed, and includes a residential structure and other agricultural support structures clustered on the southeast area of the site. The development is located adjacent to Croom Road (MD 382), which is classified as a master planned collector. No Marlboro Clays are found to occur in the vicinity of the property. According to information

obtained from the Maryland Department of Natural Resources Natural Heritage Program, there are no rare, threatened, or endangered species found to occur on this property or adjacent properties. Croom Road is a County designated scenic and historic road, a state and federally designated Scenic Byway (Star-Spangled Banner Scenic Byway) and a federally designated national historic trail (Star Spangled Banner National Historic Trail). The property is not located in a Priority Funding Area, and is currently located within the Rural and Agricultural Lands Area of the Growth Policy Map and Environmental Strategy Area 3 (formerly the Rural Tier) of the Regulated Environmental Protection Areas Map as designated by the 2014 *Plan Prince George's 2035 Approved General Plan*. The site is located in the Middle Patuxent subwatershed of the Patuxent River. According to the 2005 *Approved Countywide Green Infrastructure Plan*, the site includes Evaluation Areas along the eastern portion of the property. The property is located in the Priority Preservation Area as designated in the 2012 *Approved Priority Preservation Area Functional Master Plan* and the Lower Patuxent Rural Legacy Area.

#### **Environmental Review**

#### Special Roadways (Scenic Byways, Designated Historic and Scenic Roads)

As previously noted Croom Road is a state and nationally designated Scenic Byway, and a locally designated historic road, and views from the roadway will be an important consideration. When this was discussed at the pre-application meeting, it was indicated that further information was needed with regard to the height of any proposed mounting structure and possibly three-dimension digital modeling to an evaluation of visual impacts.

The current proposal shows a larger array of over 10-acres located on a prominent south facing slope overlooking the special roadway. There is no existing buffer along the road, and the cultural landscape is of a large agricultural field fronting along a ridgeline just north of Mattaponi Creek. The subject property has almost 1,000 linear feet of frontage along Croom Road and the cultural landscape exists in a highly agricultural state on both sides of the roadway from West End Farms to the north, to Hill Road to the south, at a distance of almost four miles and is one of the most pristine along the Lower Patuxent Scenic Byway Corridor.

The 2010 *Prince George's County Landscape Manual* includes specific requirements for the Buffering of Special Roads which are included in Section 4.6. The site would usually be subject to Buffering Development from Special Roadways requirements found in the Landscape Manual, as follows (Pages 70-71):

- (A). When a property supporting any use has frontage on a special roadway, a buffer area shall be provided adjacent to the entire right-of-way, excluding driveway openings. All plant material required by this section shall be located outside of public utility easements adjacent to the right-of-way. The width of the buffer area and the plant material required to be planted with the buffer area shall be as follows:
  - (iii) Rural Tier-Designated historic roads, designated scenic roads, Maryland State-designated byways, and the Suitland and Baltimore-Washington Parkway

A minimum forty (40) foot wide buffer to be planted with a minimum of one hundred sixty (160) plant units per one hundred (100) linear feet of frontage, excluding driveways, for high impact use only. The buffering and planting

requirements for all other uses (not high impact uses) shall be a minimum of a forty foot-wide buffer to be planted with a minimum of eighty plant units. One hundred (100) percent of the plant units provided within the buffer shall be native species that shall be randomly spaced to mimic local forest communities.

- (B) When existing noninvasive trees are located within the buffer, preservation of the trees is generally preferred to the planting of new trees. When existing vegetation is located in only part of the buffer, the number of plant units required to be planted may be reduced in proportion to the percentage of the area of the buffer occupied by existing vegetation. Any invasive species should be removed from the buffer area.
- (C) The buffering and planting requirements of Section 4.6(c)(2)(iii) may be reduced if viewshed studies indicate, at the time of a detailed site plan, specific design plan, or special exception (or if none of these are required through an application for alternative compliance) that the alternative landscape design will conserve and enhance the special roadway with regard to the natural and/or cultural features of the surrounding area.

It is recommended that prior to the issuance of permits, the applicant work with Planning Department staff to ensure that the proposed project does not negatively impact the scenic viewshed and visual character of Croom Road. The quantity of plant units and their size required under these standards are insufficient to "buffer" a solar array of the size and location proposed to be placed on an open slope with full visibility from the roadway. Creating some sort of foreground would be necessary, which would require a setback of the solar arrays from the roadway. Section 4.6 would require a minimum of a 40 foot buffer, but as structures, it is recommended that the solar arrays be set back a minimum of the front restriction line in the R-A zone (50 foot required setback) or consistent with the setback of other accessary structures fronting on this section of Croom Road.

Also of concern is the proposed chain link fence around the entire perimeter of the complex, which would detract from the scenic and historic nature of the viewshed. A more attractive alternative should be considered, which is consistent with the rural character of the roadway.

### Located in the State-Recognized Lower Patuxent Rural Legacy Area and Priority Preservation Area

The site is located in areas which have been designated as priority land preservation and conservation areas. It is acknowledged that the use is temporary for 27 years, and that the land can be returned to agricultural uses after the completion of the lease if that is the desire of the owner. However, taking limited agriculture lands out of agricultural use for a lengthy period does not support the need to maintain sufficient land area to support the elements necessary to support an agricultural economy in Prince George's County, which in the future would be difficult to re-establish if they are supporting local agriculture.

Visibility from Croom Road and Visual Impacts to the National Scenic Byway and Historic Trail The elevation at the lower southeast corner of the property is 60 feet MSL. The elevation of the property at the northwest corner is 134 feet MSL, an elevation change of approximately 74 feet over a cross-sectional line joining the two points. The location of the array is highly visible from a vehicle or bicycle

traveling along Croom Road, and would be very difficult to buffer. The structure is proposed at a higher elevation overlooking the roadway, and in an area where there is no existing visual buffering.

It should be further noted that during the recent bicentennial of the War of 1812, which concluded in 2014; that considerable state and local resources were invested in developing the tourism potential of the Star Spangled Banner Scenic Byway, and the unique role that Maryland and Prince George's County played.

It is recommended that the applicant work with the Planning Department to ensure that the final design of the proposed project minimizes negative impacts to scenic viewsheds along Croom Road. While acknowledging that the impacts are proposed as temporary for 27 years, the negative impact on the tourism investments and improvement that have been made could be significant and long lasting.

#### **Natural Resources Inventory/Existing Conditions**

The site does not have a Natural Resources Inventory. A Natural Resources Inventory Plan or Equivalency Letter will be required for Stormwater Management Concept approval for the project proposed.

An Existing Site Conditions statement or plan was not provided by the applicant for the site. Exhibits were submitted based on MERLIN mapping information for specific site information, but they were not as detailed as the information provided on the PGATLAS.com web-based mapping available on-line for the Prince George's County site. There is an existing "floodplain and conservation easement" shown on record plat NLP 148-020.

#### **Woodland Conservation**

The proposed site plan did not include a grading plan. It appears that the proposed development is within the open area of the site and may qualify for a numbered exemption from the Woodland Conservation Ordinance (WCO). The site is greater than 40,000 square feet in area, and contains more than 10,000 square feet of woodlands.

Because a grading permit will be required based on the extent of grading proposed (over 5,000 square feet of ground disturbance) compliance with the Woodland Conservation Ordinance at time of permitting will require either a Type 2 Tree Conservation Plan or a Letter of Exemption. The project may be eligible for a Letter of Exemption from the Woodland Conservation Ordinance if the plan demonstrates the removal of less than 20,000 square feet of woodlands under the governmental projects exemption, but will require submittal of a Forest Stand Delineation (FSD) plan to confirm, prior to issuance.

#### **Regulated Environmental Features**

As previously noted, the site contains streams and stream buffers, and existing conservation and floodplain easements. It appears that the proposed solar panels have been located away from the stream buffers and easement areas; however, it is not clear whether the 100-foot wide stream buffers will be impacted. These features should be preserved to the fullest extent possible.

As previously stated, it is recommended that a Natural Resources Inventory (NRI), grading plan and stormwater management concept plan be submitted to evaluate potential impacts. A review of this information will also be used to determine whether the project requires a Type 2 Tree Conservation Plan or qualifies for a Letter of Exemption.

#### Conclusion

The size and location of the project now proposed is a substantial concern. Compatibility with the "Rural and Agricultural Lands" character of the neighborhood, and the numerous scenic and historic designations indicates the visual quality of the Croom Road corridor.

While recognizing the benefits of clean energy alternatives, and supporting the placement of solar arrays in locations that do not damage designed scenic and historic resources, it is questioned whether the placement of a solar array in a cultural landscape of national significance is appropriate. Additional information is necessary for a full evaluation of the viewshed impacts and possible mitigation through the necessary environmental review and permitting processes.

The County has several agricultural and land-based preservation programs for which this site would be eligible, which would allow the site to remain as a rural agriculture landscape. There are also many old sand and gravel mines located throughout the rural area of the County, and outside of the viewshed of scenic and historic roads which are not suited for agricultural purposes now or in the future, which are well adapted to these types of projects.

Thank you for the opportunity to comment this project. We recommend further evaluation of the proposal based concerns raised in this memorandum. If you have questions regarding these comments, please contact the Environmental Planning Section at 301-952-5404.

14741 Governor Oden Bowie Drive Upper Marlboro, Maryland 20772 TTY: (301) 952-4366 www.mncppc.org/pgco

March 28, 2016

#### **MEMORANDUM**

TO:

Fatimah Hasan, Planner Coordinator, Special Projects Section, Countywide

Planning Division

VIA:

Susan Lareuse, Master Planner, Urban Design Section, Development Review

Division

Urban Design Section

FROM:

Jill Kosack, Senior Planner, Urban Design Section, Development Review

Division

**SUBJECT:** 

Mandatory Referral MR-1522F

Boyd Farm Solar Project

The Urban Design Section is in receipt of the materials provided in support of Mandatory Referral MR-1522F, Boyd Farm Solar Project, for construction of a photovoltaic solar array on the three agricultural properties owned by Theodore and Ergibe Boyd at 11504 Croom Road, Upper Marlboro. The generated electricity will be sold to the Montgomery County Board of Education (MCPS), or another qualifying Maryland municipal entity. The subject project is being reviewed as part of the Mandatory Referral review process pursuant to Maryland Annotated Code, The Land Use Article §20-301 through 305 of the Prince George's County Zoning Ordinance.

The proposed solar array covering approximately 10.9 acres, will include ground-mounted panels and electrical equipment enclosed by a locked six-foot-high chain link fence, with an access drive from an existing driveway located adjacent to the western property line. SunEdison, Inc., will retain ownership of the solar electrical equipment and responsibility for its operation and maintenance and at the conclusion of the 27-year lease SunEdison will remove the equipment and restore the site to its current condition at their own cost.

The Urban Design Section offers the following discussion regarding the proposed project:

The proposed solar field will be located internal to an existing agricultural property, surrounded by other agricultural and residential properties and will result in minimal grading impacts and no tree removal. The surrounding properties are largely for agricultural and residential uses. Given the existing trees to the northeast and west, the proposed solar arrays should be minimally visible and have little impact on those properties.

The property has frontage on Croom Road, which is a state and nationally designated Scenic Byway, and a locally designated historic road, with no existing buffer along the frontage. The provided plans were unclear as to the proximity of the facility and fence to the roadway. However, given that the majority of the property sits at a higher elevation than the road, the facility will most likely be highly visible from this special roadway. Per the 2010 Prince George's County Landscape Manual, a 40-foot-wide buffer planted with 80 plant units per 100 linear feet would typically be required along a developing site's frontage on a designated scenic and historic road in this area of the County. Therefore, Urban Design staff suggests that the design of the frontage of this property on Croom Road, including plantings, fence type and proximity of the solar facility to the roadway be carefully considered in order to not detract from the scenic nature of this rural road. Avoiding the use of corrugated metal or fiberglass, sheet metal, chain link with slats and mesh fencing is strongly suggested. If fencing is required along the street frontage, an attractive style and material consistent with the rural character of the roadway should be considered, or at the least, a black-vinyl coated chain link fence with landscaping in front of the fence within a minimum 40-foot-wide planting strip. Furthermore, the planting should follow the standards set forth in the Landscape Manual Section 4.6(c)(2)(A)(iii) regarding native species and natural spacing.



14741 Governor Oden Bowie Drive Upper Marlboro, Maryland 20772 TTY: (301) 952-4366 www.mncppc.org/pgco

Prince George's County Planning Department Community Planning Division

March 17, 2016

301-952-3972

#### **MEMORANDUM**

TO:

Fatimah Hasan, Planner Coordinator, Special Projects Section, Countywide Planning

Division

VIA:

Steve Kaii-Ziegler, Planning Supervisor, South Section, Community Planning Division

FROM:

Betty Carlson-Jameson, Planner Coordinator, South Section, Community Planning

Division

SUBJECT:

MR-1522F - Boyd Farm Solar Project

#### DETERMINATIONS

The application is consistent with 2014 Plan Prince George's 2035 Approved General Plan (Plan 2035) policies for a rural and agricultural areas.

This application is consistent with the 2013 Approved Subregion 6 Master Plan policies for rural development, specifically in the Economic Development Chapter Policy 2, Strategy 8 on page 148: "Investigate opportunities for promoting green industries".

#### BACKGROUND

Location:

The property is located at 11504 Croom Road, Upper Marlboro.

Size:

10.9 acres

Existing Uses:

Undeveloped, used for agricultural use

Proposal:

The project is proposed to install ground mounted solar arrays.

#### GENERAL PLAN, MASTER PLAN AND SMA

This application requires no conformance with the applicable General or Master Plan.

General Plan:

Plan 2035 describes Rural and Agricultural Areas as areas with significant natural and agricultural resources that are best suited for low-density residential development on well and septic, agricultural activity, and forest preservation.

Master/Sector Plan:

2013 Approved Subregion 6 Master Plan and Sectional Map Amendment

Planning Area/

Community:

Planning Area 86A

Land Use:

Rural

Environmental:

Refer to Environmental Planning Section referral for comments on the environmental chapter of the 2013 Approved Subregion 6 Master Plan and Sectional Map Amendment and the 2005 Approved Countywide Green

Infrastructure Plan.

Historic Resources:

None identified

Transportation:

Access is provided along Croom Road.

Public Facilities:

None identified

Parks and Trails:

None identified

Aviation/ILUC:

The subject site does not fall within any aviation policy area or the Joint Base

Andrews Land Use Control Impact area.

SMA/Zoning:

The 2013 Approved Subregion 6 Master Plan and Sectional Map Amendment

retained the O-S Zone.

#### **PLANNING ISSUES**

There are no General Plan or Master Plan issues raised by this application.



#### THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

#### Prince George's County Planning Department Countywide Planning Division

(301) 952-3650 www.mncppc.org

March 10, 2016

#### **MEMORANDUM**

TO:

Fatimah Hasan, Planner Coordinator, Special Projects Section, Countywide Planning

Division

VIA:

Maria Martin, Planning Supervisor, Special Projects Section, Countywide Planning

Division

FROM:

Jay Mangalvedhe, Senior Planner, Special Projects Section, Countywide Planning Division

SUBJECT:

MR-1522F Boyd Farm Solar Project

#### **Project Description**

The proposed project property is located at 11504 Croom Road, Upper Marlboro. The purpose of this project is to construct a photovoltaic solar array by SunEdison, Inc. to generate electricity on the three agricultural properties owned by Theodore and Ergibe Boyd. The solar array would consist of 8,208 polysilicon modules (panels) mounted on steel racking secured into the ground using driven piles, covering a total area of 10.9 acres. The facility will also include 2 central inverters, an AC accumulation panel to consolidate the electric output from each inverter, and one 2000kVA transformer to facilitate electricity production on an "equipment pad" area marked on the Site Description. In addition, 490 feet of electrical conduit would be installed underground to connect the array to the utility's existing electrical service point of interconnection (POI), located to the south along Croom Road.

The clean energy produced on private properties will be sold to the Montgomery County Board of Education as stipulated by Maryland Public Service Commission's "Aggregate Net Metering policy to a qualifying municipal entity in Maryland.

SunEdison will retain ownership of the solar electrical equipment and responsibility for its operation and maintenance. At the conclusion of the 27-year lease, SunEdison will remove the equipment and restore the site to its current condition at its own cost.

The project is located in Council District 9 and is outside the Growth Boundary as classified in the 2014 Plan Prince George's 2035 Approved General Plan.

#### **Evaluation of Existing Public Facilities**

#### **Police Facilities**

The police services are provided by the Prince George's County Police Department, District V, and is located at 6707 Groveton Drive in Clinton, Maryland.

#### Fire and Emergency Medical Services Facilities

The proposed project is served by Upper Marlboro Fire/EMS Co. 845, a first due response station, with a maximum of seven minutes travel time, and is located at 7710 Croom Road. The station is equipped with two engines, one ambulance, one Breathing Air Unit and one Hazmat.

The 2008 Approved Water and Sewer Plan places this property in Water and Sewer Category 6, Individual System.

### MANDATORY REFERRAL REVIEW

# PROPOSED BOYD FARM SOLAR PROJECT UPPER MARLBORO, MARYLAND

for review by

PRINCE GEORGE'S COUNTY PLANNING BOARD APRIL 28, 2016

AGENDA ITEM: #8

**APPLICATION: MR-1522F** 

# WHY MANDATORY REFERRAL REVIEW?

The Maryland-National Capital Park and Planning Commission (M-NCPPC)

Prince George's County Planning Department

### Mandatory Referral Review Objectives:

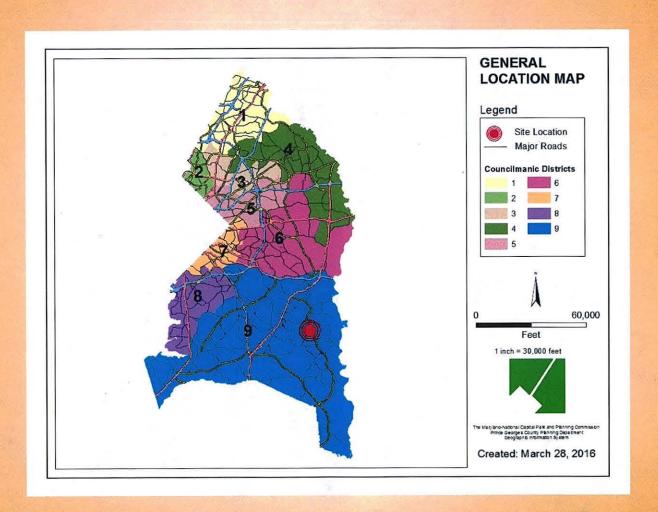
- To be in compliance with state law Sections §20-301 through 305 of the Land Use Article.
- To build consensus with other public agencies: federal, state, public/private utilities.
- To engage in dialogue with federal, state and local counterparts.
- To inform/educate adjacent private owners of any impending impacts.

# PROPOSED BOYD FARM SOLAR PROJECT

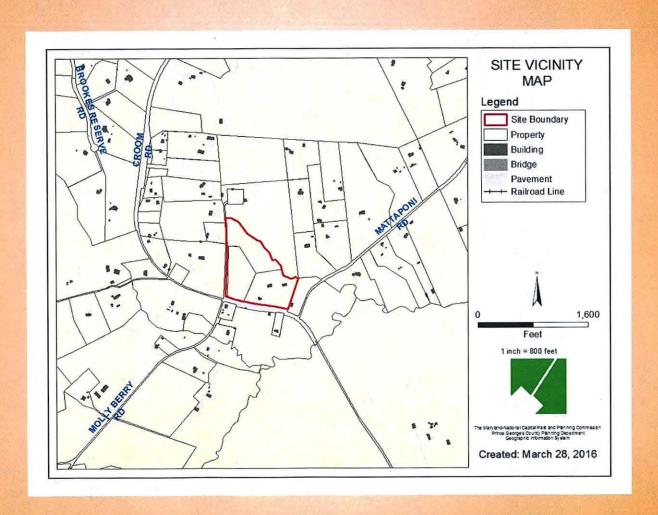
### **PURPOSE**

 To construct a ground-mounted solar facility on leased property for the purpose of generating electricity.

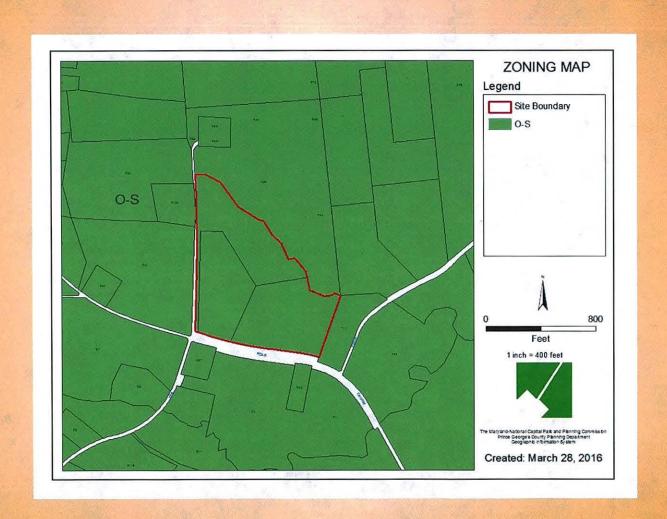
### GENERAL LOCATION



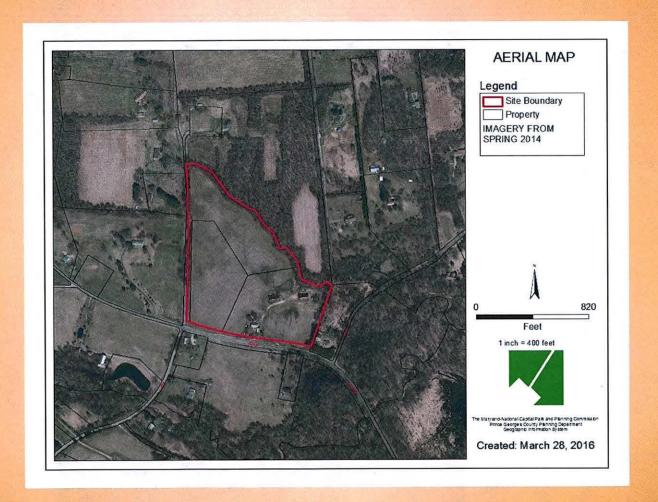
## SITE VICINITY



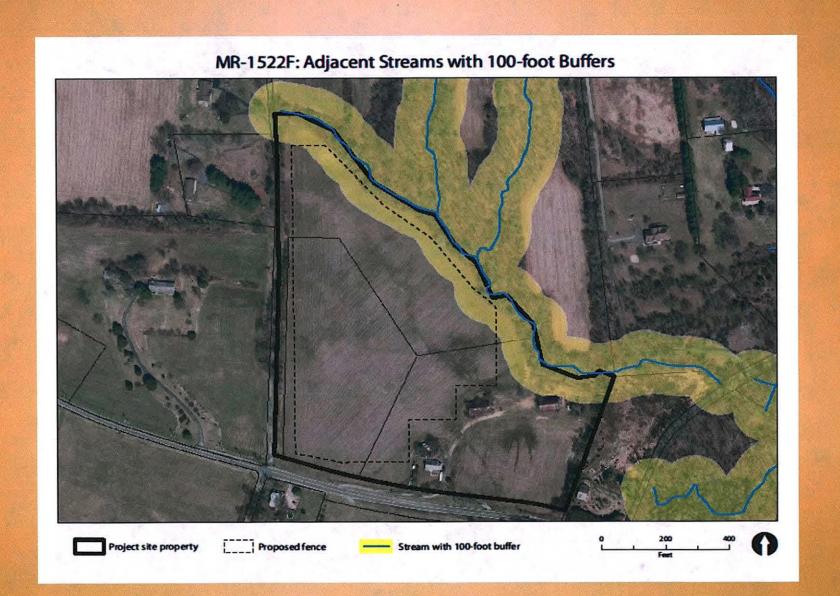
## EXISTING ZONING



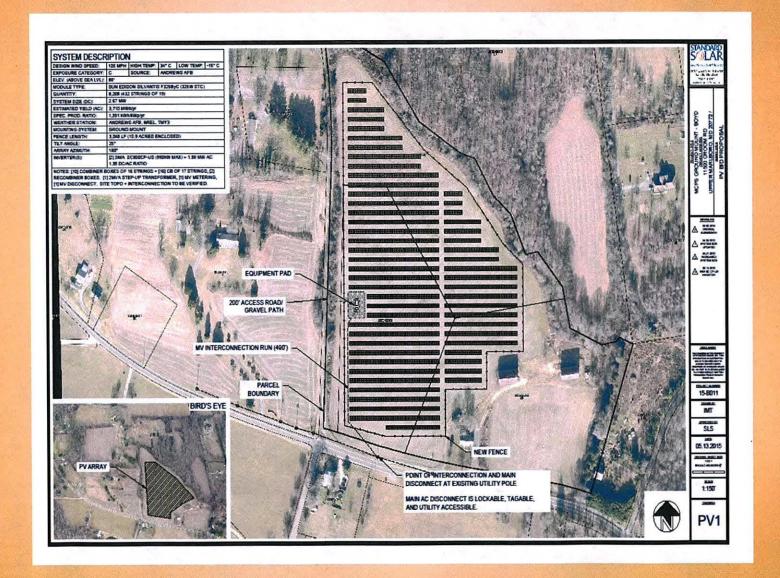
## **AERIAL VIEW**



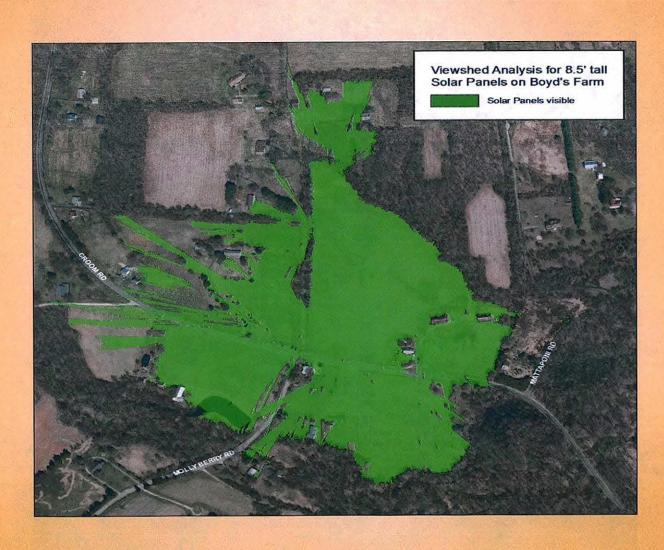
## ENVIRONMENTAL FEATURES



## APPLICANT SITE PLAN

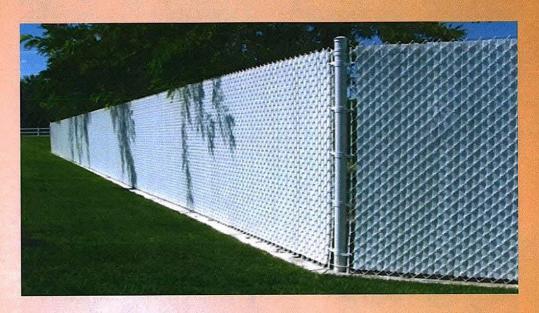


# VISUALIMPACT TO THE VIEWSHED



# FENCING OPTIONS

PROPOSED BY APPLICANT





RECOMMENDED BY STAFF

## VIEW OF SOLAR PANELS



# Proposed Boyd Farm Solar Project Existing Conditions

- The project site is located on Croom Road between Molly Berry Road and Mattaponi Road, 5.5 miles from the Croom Road/US 301 intersection.
- The owners of the three contiguous properties totaling 10.9 acres at 11504
   Croom Road, Upper Marlboro, Maryland are Theodore and Ergibe Boyd.
- In March of 2015, SunEdison, Inc. and Standard Solar, Inc. received exclusive rights to sell solar energy generated on private property to the Montgomery County Public Schools Board of Education (MCPS-BOE).
- In November of 2015, the Boyds executed a 27-year lease agreement with SunEdison, Inc. to develop a solar facility on their property.
- The electric power would be sold to MCPS for 20 years, and SunEdison would contract with another qualifying Maryland municipal entity for the remaining seven years of the lease.

# Proposed Boyd Farm Solar Project Existing Conditions (continued)

- SunEdison, Inc. and Standard Solar, Inc. agreed to bear all capital costs
  associated with the project construction.
- SunEdison agreed to retain ownership of the solar electrical equipment and responsibility for its operation and maintenance, while selling the power generated to MCPS, thus providing a net savings to MCPS.
- There are existing trees that provide visual screening to landowners to the north, west, and east of the proposed facility.
- There are several residential structures and agricultural support structures
  clustered on the southeast area of the site.

### **Staff Recommendations**

- Additional information is necessary for a full evaluation of the viewshed impacts. It is questioned whether the
  placement of a solar array in a cultural landscape of national significance is appropriate. Staff suggests that the
  applicant make every effort to consider a site outside of the scenic and historic viewshed, and not a site which is
  eligible for agricultural preservation.
- The County has several agricultural and land-based preservation programs for which this site would be eligible, which would allow it to remain as a rural agriculture landscape. There are also many old sand and gravel mines located throughout the rural area of the County, and outside of the viewshed of scenic and historic roads which are not suited for agricultural purposes now or in the future, which are well adapted to these types of solar array projects.

Should the project proceed at this location, staff has the following recommendations:

• It is recommended that a Natural Resources Inventory (NRI), grading plan and stormwater management concept plan be submitted to evaluate the potential impacts. A review of this information will also be used to determine whether the project requires a Type 2 Tree Conservation Plan or qualifies for a Letter of Exemption.

### Staff Recommendations (continued)

- A Natural Resources Inventory Plan or Equivalency Letter will be required for Stormwater Management Concept approval for the proposed project.
- The site is greater than 40,000 square feet in area, contains more than 10,000 square feet of woodland and is subject to the Woodland and Wildlife Habitat Conservation Ordinance (WCO).
- Because a grading permit will be required based on the extent of grading proposed (over 5,000 square feet of ground disturbance) compliance with the WCO at the time of permitting will require either a Type 2
   Tree Conservation Plan or a Letter of Exemption.
- O The project may be eligible for a Letter of Exemption from the Woodland Conservation Ordinance if the plan demonstrates the removal of less than 20,000 square feet of woodlands under the governmental projects exemption, but will require submittal of a Forest Stand Delineation (FSD) plan to confirm, prior to issuance.
- It is recommended that the natural and environmental features on the site, such as streams and 100-foot-wide stream buffers, which GIS analysis indicates will be impacted, be preserved to the fullest extent possible, as well as conservation and floodplain easements.

### Staff Recommendations (continued)

- The 2010 Prince George's County Landscape Manual includes specific requirements for the Buffering of Special Roads which are included in Section 4.6. The site would usually be subject to Buffering Development from Special Roadways requirements found in the Landscape Manual (shown below, pages 70-71). This section includes requirements for at least a 40-foot-wide buffer, planted with 80 plant units per 100 linear feet (not a high impact use), the typical requirement along a developing site frontage on a designated scenic and historic road in this area of the County.
- It is recommended that, prior to the issuance of permits, the applicant work with the Planning Department on an in-depth assessment of the proposed project's visual impact to ensure that it does not negatively impact the scenic and historic viewshed and visual character of Croom Road, also part of the Star Spangled Banner Scenic Byway. The quantity of plant units and their size required under the standards of the 2010 *Prince George's County Landscape Manual* are insufficient to "buffer" a solar array of the size and location proposed to be placed on an open slope with full visibility from the roadway. Creating some sort of foreground would be necessary, which would require a setback of the solar arrays from the roadway. Section 4.6 of the Landscape Manual would require a minimum of a 40 foot buffer, but as structures, it is recommended that the solar arrays be set back a minimum of the front restriction line in the R-A zone (50 foot required setback) or consistent with the setback of other accessory structures fronting on this section of Croom Road.

### Staff Recommendations (continued)

• The proposed solar arrays should be situated so that they are minimally visible. It is recommended that the design of the frontage of this property on Croom Road, including plantings, fence type and proximity of the solar facility to the roadway be carefully considered in order to not detract from the scenic and historic nature of this rural road. The applicant should consider a more attractive alternative to the proposed chain link fence around the entire perimeter of the complex. Avoiding the use of corrugated metal or fiberglass, sheet metal, chain link with slats and mesh fencing is strongly suggested. If fencing is required along the street frontage, an attractive style and material consistent with the rural character of the roadway should be considered, or at the least, a black-vinyl coated chain link fence, with landscaping in front of the fence within a minimum of a 40-foot-wide planting strip. Furthermore, the planting should follow the standards set forth in the Landscape Manual Section 4.6(c)(2)(A)(iii) regarding native species and natural spacing.

# Proposed Boyd Farm Solar Project

This concludes the staff presentation

Questions?