THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

14741 Governor Oden Bowie Drive
Upper Marlboro, Maryland 20772
www.mncppc.org/pgco

Office of the Chairman
Prince George's County Planning Board

(301) 952-3561

October 3, 2019

Mr. Benjamin Levy
101 Constitution Avenue, N.W.
Suite 525E
Washington, D.C. 20001

RE: Saint Barnabas Solar Project
(MR-1907F)

Dear Mr. Levy:

The Prince George's County Planning Board had the opportunity to review the proposed StoneMor Solar Project during its regular meeting on October 3, 2019 and voted to support staff's recommendations listed below. A copy of the staff report is enclosed for your information.

STAFF RECOMMENDATIONS:

- The applicant should obtain an approved Historic Area Work Permit for the work required within the Environmental Setting of the Saint Barnabas Church, Oxon Hill and Cemetery Historic Site (PG76A-004).
- The applicant should stagger the planting of evergreen trees along the northern boundary of the solar array site.
- The applicant should reduce the plant units in the bufferyard along Saint Barnabas Road to a ratio of 80 plant units per each 100 linear feet of the perimeter of the fence.
- The applicant should replace *Mahonia aquifolium* (Oregon Grape Holly) with a Maryland native species.
- The applicant should replace the proposed six-foot chain link fence with a faux wrought iron fence enclosing the entire Saint Barnabas Solar Project site.
- Prior to the commencement of construction, the applicant should contact the Prince George's County Fire/EMS Department to request that a pre-incident Emergency Plan for their facility be conducted by the closest station to the site. The pre-incident Emergency Plan will involve establishing points of contact and timely response options, facilitating emergency vehicle access throughout the site, creating a consistent marking protocol for the identification of system components that require special attention during an emergency, and developing appropriate Standard Operating Procedures or Standard Operating Guidelines for addressing on-site emergencies.

- The applicant should design, install and maintain the proposed project to meet all applicable minimum standards set forth in the National Fire Protection Association (NFPA) 70: National Electrical Code and all applicable minimum standards appropriate for ground-mounted solar facilities set forth in NFPA 1: Fire Code.
- The applicant should submit a Development Concept Plan for Phase 2 of the projects with required information for staff review at the Full Level.

If you have any questions, please contact Christine A. Osei at 301-952-3313 or via email at Christine.Osei@ppd.mncppc.org.

Sincerely,

Elizabeth M. Hewlett
Chairman

Enclosure

c: Andree Green Checkley, Planning Director, Office of the Planning Director
Katina Shoulars, Acting Division Chief, Countywide Planning Division
Crystal Hancock, Acting Planning Supervisor, Special Projects Section, Countywide Planning Division
Christine A. Osei, Planner Coordinator, Special Projects Section, Countywide Planning Division
Donna J. Brown, Clerk of the Council, Prince George's County Council

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.pgplanning.org/planning.home.htm

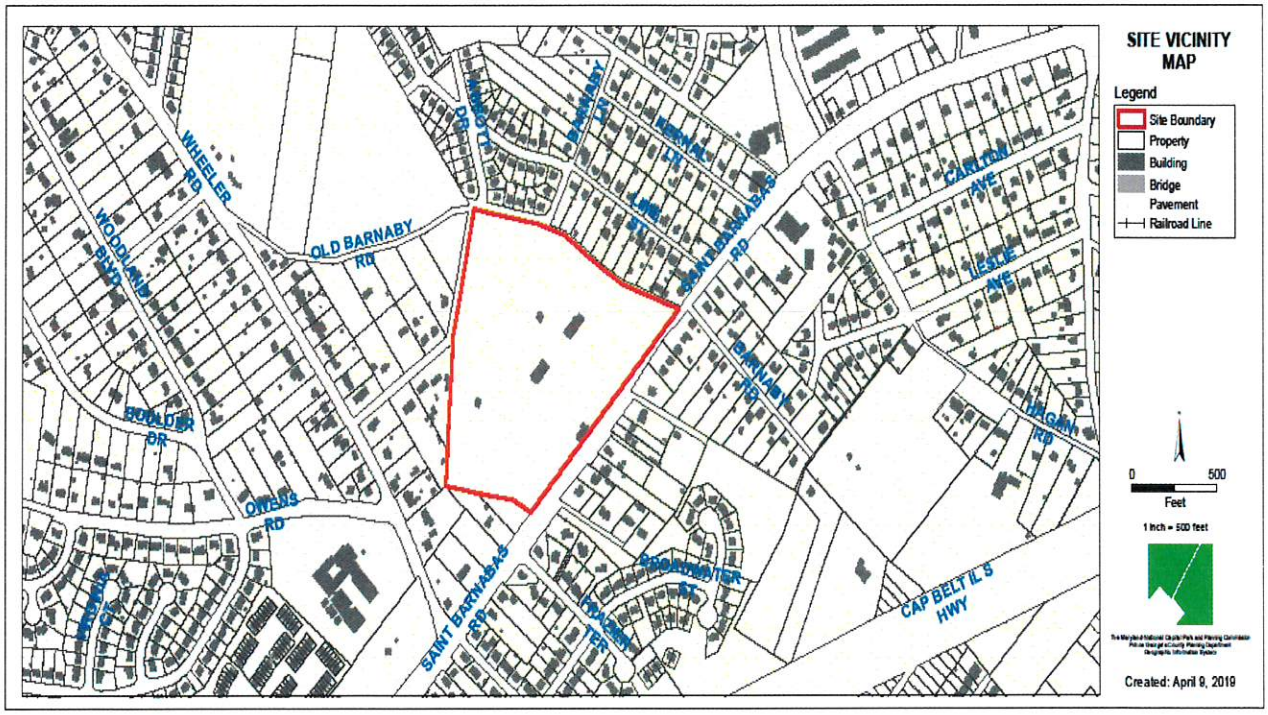
Mandatory Referral MR-1907F

Application	General Data	
Project Name: Saint Barnabas Solar Project	**Planning Board Hearing Date:**	10/3/19
Location: 5203 Saint Barnabas Road Temple Hills, MD 20748	**Date Accepted:**	5/10/19
	Mandatory Action Timeframe:	Beyond 60 Day Continued from June 27, 2019
Applicant/Address: Ameresco, Inc. 101 Constitution Avenue, N.W. Suite 525 East Washington, D.C 20001	**Acreage:**	27.11-acre site
	Zone:	R-R
	Planning Area:	76A
Property Owner: Saint Barnabas Episcopal Church 5203 Saint Barnabas Road Temple Hills, MD 20748	**General Plan Tier:**	Established Communities
	Council District:	7
	Municipality:	N/A
	200-Scale Base Map:	

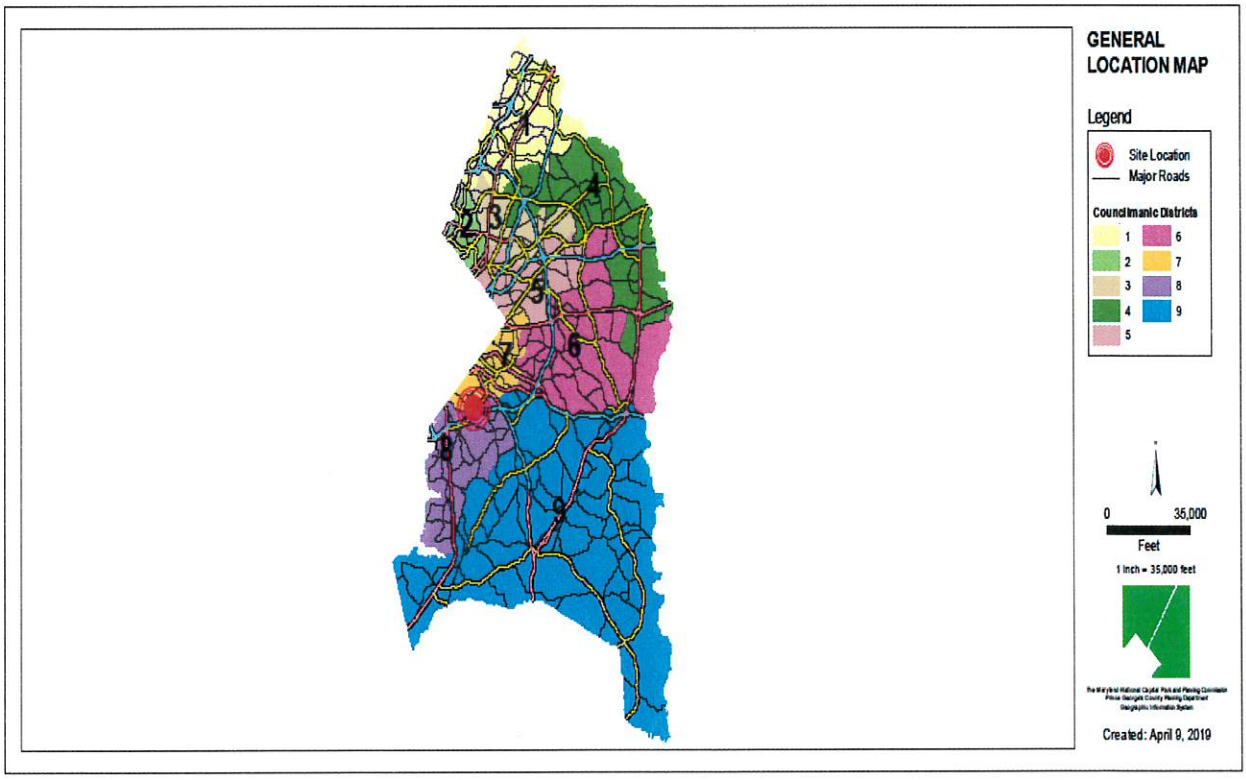
Purpose of Application	Notice Date
The applicant seeks to construct a solar array capable of producing 1400KW to 1700KW in nominal power. The array is to be constructed on a 4.0-acre area of the larger 27-acre site which is zoned R-R. The project site is located approximately 0.15 miles north of the intersection of Saint Barnabas Road and Wheeler Road in Temple Hills, Maryland.	**Acceptance Mailing:** July 31, 2019

Staff Recommendation	Staff Reviewer: Christine A. Osei
Transmit Staff Report to: Mr. Benjamin Levy 101 Constitution Avenue, N.W. Suite 525 East Washington, DC 20001	**Phone Number:** 301-952-3313 **Email:** Christine.Osei@ppd.mncppc.org

Map 1 – Vicinity Map



Map 2 - General Project Location Map



The Maryland-National Capital Park and Planning Commission

PRINCE GEORGE'S COUNTY PLANNING BOARD

STAFF REPORT

Subject: Mandatory Referral (MR-1907F)
Proposed Saint Barnabas Solar Project

The subject project for the proposed solar is being reviewed pursuant to the Land Use Article §§20-301 through 305 of the Maryland Annotated Code and Section 27-294 of the Prince George's County Zoning Ordinance which require 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 solar project will not be reviewed by the Maryland Public Service Commission (PSC) because the total output of the proposed project is below the 2000 KW AC threshold. The applicant will submit a Certificate of Public Convenience and Necessity Exemption request to the PSC for an approval letter.

PROJECT OVERVIEW

SITE DESCRIPTION

The subject site is in the R-R Zone, comprised of 27.11-acres and located at 5203 Saint Barnabas Road in Temple Hills, Maryland. The site is a designated Prince George's County Historic Site, Saint Barnabas Church and Cemetery (PG:76A-004). The site is improved with two church buildings, a school structure, and a storage shed.

The proposed project site is to be constructed in the southern portion of the site which is currently being used as a storage yard for a mulch operation. This area is bounded to the north by an existing gravel driveway leading to the church. Both the adjacent church and residential properties are in the R-R Zone; to the east by the right-of-way of Saint Barnabas Road; to the south by land owned by Full Gospel AME Zion Church; and to the west by single-family detached homes in the R-R Zone.

BACKGROUND

The site has not been previously reviewed as part of any Development Review (Subdivision or Zoning) application. A Natural Resource Inventory Plan and Type 2 Tree Conservation Plan have been submitted for review.

PROJECT DESCRIPTION

The applicant seeks to construct a solar array capable of producing 1400KW to 1700KW in nominal power. The array is to be constructed on a 4-acre area of the larger 27-acre site which is zoned R-R. The proposed arrays will be approximately seven feet tall with solar panels pitched between ten and twenty degrees facing south, oriented in east-west rows, separated by approximately eight to ten feet. Trenching will be required for the few north-to-south areas that carry low voltage power cables and a concrete pad that supports the metal-clad switchgear. The project is designed and contracted to generate power for approximately 25 years. Ameresco, Inc. plans to decommission the project upon the end of its useful life and return the site to its original condition. The applicant has entered into a long-term lease with the Saint Barnabas Episcopal Church to develop this solar project.

The project scope has been revised since its original submittal which was first scheduled to be heard by the Planning Board on June 27, 2019. The plan has now been revised to eliminate any disturbance to the

existing woodlands along the adjoining property. However, the impacts to the Environmental Setting of Saint Barnabas Episcopal Church and Cemetery Historic Site (PG:76A-004) have not been addressed.

PROJECT SCHEDULE/HOURS OF OPERATION

The site will be developed in two phases. The first phase (Phase 1) will take approximately four months to complete. It is anticipated that the project will generate some local jobs during the construction phase of the project. Upon completion of the construction and once the site is in full operation under normal conditions, there will be approximately two maintenance team visits planned per year. As the weather permits, there may be six to eight visits to mow the grass under and around the solar arrays. The applicant will submit a development concept plan with required information for staff review for Phase 2 of the project.

COMMUNITY OUTREACH

Planning Department:

Notification letters were mailed to adjoining property owners and area civic associations on September 3, 2019. At the time the revised staff report was prepared, no homeowners or civic associations had expressed concern about this proposed solar project.

Applicant:

The applicant sent out letters to adjoining property owners and knocked on doors of community residents that lived closest to the project site. Ameresco, Inc. also indicated that the project team met with the adjoining Barnaby Manor Citizens Association and others.

PROJECT ANALYSIS

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

1. **CONFORMANCE WITH THE 2018 ADOPTED PRINCE GEORGE'S COUNTY SOLAR ENERGY SYSTEMS (SES) GUIDELINES for MANDATORY REFERRAL CASES**
   The revised development concept is consistent with SES Guidelines regarding Woodland Conservation. The revised Landscape Plan shows no clearing or grading within the on-site and off-site woodland areas.

2. **CONSISTENCY WITH APPROVED PLANS**
   This application conforms to the Institutional land use recommendations of the 2008 *Approved Branch Avenue Corridor Sector Plan and Sectional Map Amendment.* The application is consistent with the 2014 *Plan Prince George's* 2035 *Approved General Plan* (Plan 2035) which designates this application in the Established Communities. The vision for the Established Communities is to provide context-sensitive infill and low-to-medium density development and to recommend maintaining and enhancing existing public services, facilities, and infrastructure to ensure that the needs of residents are met. Plan 2035 encourages investment in energy infrastructure and renewable energy and encourages the generation of low-carbon and clean, renewable energy sources.

3. **CONSISTENCY WITH DEVELOPMENT/REGULATORY STANDARDS**
   The project is exempt from the requirements of the 2010 Prince George's County Landscape Manual. The Urban Design Section notes that the site would normally be required to demonstrate conformance with the following Sections: 4.2, Requirements for Landscape Strips Along Streets, 4.4 Screening Requirements, 4.7 Buffering Incompatible Uses, and Section 4.9, Sustainable Landscaping Requirements.

Based on the revised landscape plan provided on August 27, 2019, the Urban Design Section recommends planting evergreen trees in a staggered manner to maximize the screening of the perimeter fence along the northern boundary of the project area. Another concern is that too many shade trees in the 20 foot-wide bufferyard may compromise the growth of the rest of the proposed planting materials including evergreen trees, ornamental trees and evergreen shrubs. Staff recommends that the plant units in the 20 foot-wide bufferyard, along Saint Barnabas Road, be provided in accordance with the landscape manual requirement, specifically, to provide 80 plant units per 100 linear feet of property line instead of the proposed 110 plant units per 100 linear feet. Crowded plantings may hinder the healthy growth of the proposed plants. All plants shall be native species. The applicant should replace *Mahonia aquifolium* (Oregon Grape Holly) with a Maryland native species.

4. ENVIRONMENTAL ASSESSMENT

The Environmental Planning Section has determined that this project will impact only the subject site and not impact the adjacent properties as previously shown. A full NRI Plan (NRI-093-2018) on the site was submitted on July 26, 2019 and is still in the review process.

Woodland Conservation: The revised plan demonstrates that no woodland will be cleared for the placement of solar arrays which is consistent with the Planning Board's SES Guidelines. All woodland will be preserved. A few individual dead trees will be removed, and some individual trees may be relocated. If these two individual trees are removed and relocated a Type 2 tree conservation plan will be required in addition to a Historic Area Work Permit (HAWP).

Soils: According to the U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) Web Soil Survey (WSS), the predominant soils found to occur on this site include Beltsville-Urban land complex (0 to 5 percent slope and 5 to 15 percent slope), and Grosstown gravelly silt loam (2 to 5 percent slope and 5-10 percent slope). Only the gravelly silt loam (2 to 5 percent slope) soil is classified by the NRCS as a Farmland of Statewide Importance. This soil series is located outside of the project area in the north west corner of the overall property. Marlboro or Christiana clays are not found on or near this property.

5. TRANSPORTATION ASSESSMENT

Saint Barnabas Road (MD 414) is listed in the 2009 *Approved Countywide Master Plan of Transportation* as a master plan arterial facility with a proposed right-of-way of 120 feet and four to six lanes. It is noted that all proposed structures are outside of the ultimate right-of-way.

6. HISTORIC PRESERVATION/ARCHEOLOGY

Findings:

- The proposed solar installation occupies approximately four acres within the 27.11-acre Environmental Setting of the Saint Barnabas Episcopal Church & Cemetery Historic Site (PG: 76A-004). The installation site will be located close to the primary access road within the property and close to Saint Barnabas Road. Without adequate screening, it will be fully visible from public roads. This extensive installation will occupy most of the open space west of the historic church and cemetery. The applicant's plans have undergone several revisions.

- The subject application proposes construction within the Environmental Setting of Saint Barnabas Episcopal Church and Cemetery (PG:76A-004), a Prince George's County Historic Site. The Environmental Setting of an historic site is an essential element of its historic value. The open space on which the solar installation is proposed has been historically associated with Saint Barnabas Church and Cemetery. The subject property is referenced in *Chapter 3: Sector Area Character Analysis* of the 2008 *Approved Branch*

Avenue Corridor Sector Plan and Sectional Map Amendment which describes this historic site as: *...an important landmark along Saint Barnabas Road. The buildings, cemetery and open space provide a visual oasis for the community along this heavily traveled roadway.*

- The portion of the subject property that is proposed to be developed with a solar array was once part of the Barnaby Manor plantation belonging to members of the Addison Family and has been part of the Saint Barnabas Church landholdings since 1873. The church rectory was constructed on this parcel at that time. Because of significant deterioration, the rectory was demolished about 2012 through the Historic Area Work Permit process. The area where the solar array is proposed is adjacent to the former location of the rectory.

- Historic Preservation staff recommended that the applicant conduct a Phase I archeological survey on the subject property to identify areas that should be avoided by the solar arrays. The applicant retained a consultant, Archeological Testing and Consulting, Inc., to conduct a Phase I archeological survey within the limits of disturbance for the proposed project. The Phase I survey was conducted in July 2019 within a 6-acre area of the larger 27.11-acre Environmental Setting of Saint Barnabas Church. The archeological survey consisted of a pedestrian survey and shovel testing. No above-ground resources were identified in the pedestrian survey, but extensive ground disturbance was noted in the western third of the study area. A total of 34 shovel test pits were excavated in the undisturbed portion of the study area. Five units contained historic and modern artifacts, including modern beer bottle glass, plastic, historic window-pane glass, a corroded nail, clear bottle glass, and coal chunks found in the plow zone. One historic archeological site, 18PR1135, was delineated and contained artifacts ranging in date from the nineteenth to twentieth centuries. This site was classified as a trash scatter likely associated with the occupation of the parsonage. No intact cultural features were identified. The site was not considered to have research value or archeological significance based on the limited number of artifacts recovered, poor stratigraphic integrity and a lack of intact cultural features and artifact deposits. No further work was recommended by the archeological consultant.

- The applicant's original proposal indicated that trees along the southern property line, as well as several trees on the adjoining property to the south, would be removed. The applicant revised the plans so that only a few dead trees near the former site of the rectory would be removed. Trees in the southern portion of the subject property and on the adjoining property will remain. The applicant also relocated or removed panels to the west and north to allow for a sufficient landscape buffer between the panels and the historic church and cemetery. Based on the current plan, several existing trees may require relocation.

Conclusions

Installation of the proposed solar facility within the Environmental Setting of Saint Barnabas Episcopal Church and Cemetery will have significant adverse visual and physical impacts on the Historic Site. Work within the Environmental Setting of Saint Barnabas Church & Cemetery will require an approved Historic Area Work Permit (HAWP). To minimize the visual impacts of the solar arrays on the viewshed of the Saint Barnabas Episcopal Church and Cemetery, the applicant proposes to encircle the installation with a 6 feet tall metal perimeter fence which will be screened from view with a twenty-foot landscape buffer of evergreen and deciduous trees and shrubs to the east and north, and a 6 foot landscape buffer to the west to screen the view from adjacent residential property.

- The applicant should understand that regardless of the outcome of the Mandatory Referral review process, the ultimate character of the proposed solar installation will be determined through the approval of a Historic Area Work Permit by the Historic Preservation Commission.
- The subject property was once part of a large plantation owned by members of the Addison family known as Barnaby Manor. The Phase I archeology survey identified on archeological site, 18PR1135, which consisted of a scatter of historic artifacts recovered from plowzone contexts. No subsurface features were identified. Historic Preservation staff concurs that no further archeological investigations are necessary in the area where the solar panels are proposed to be sited.

- Based on a revised landscape plan (dated September 2019), staff submits that the screening proposed to be provided will, with time and proper maintenance, substantially screen the view of the solar installation and fencing from the public street, adjacent private properties and from within the environmental setting of the historic site.

Recommendation
Historic Preservation staff recommends approval of MR-1907F, Saint Barnabas Solar without conditions. Once the Planning Board has reviewed the subject application, the applicant may submit the required Historic Area Work Permit (HAWP) to the Historic Preservation Commission to approve any modifications within the Saint Barnabas Church & Cemetery Historic Site (76A-004) before obtaining any required Prince George's County building or grading permits.

7. **ECONOMIC ASSESSMENT**
The new facility will improve the delivery of electricity and give customers an additional choice in purchasing electricity from alternative sources such as Community Solar Energy Generating System (CSEGS).

8. **EXISTING PUBLIC FACILITIES**
The proposed project is in Police District IV. The nearest station is located at 5153 Indian Head Highway in Oxon Hill. The Prince George's County Fire and Emergency Medical Services (EMS) Department indicates that a 5-minute response time is recognized as the national standard for Fire/EMS response times. This arises from the 2016 Edition of the National Fire Protection Association (NFPA) 1710 Standards for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments. This standard is being applied to the review of non-residential applications.

The closest Fire/EMS Station is the Silver Hill VFD Station 829, which is located at 3900 Old Silver Hill Road in Silver Hill. The subject property failed the adequacy test and did not meet the five-minute standard; therefore, staff recommends the following:

- Prior to the commencement of construction, the applicant should contact the Prince George's County Fire/EMS Department to request that a pre-incident Emergency Plan for their facility be conducted by the closest station to the site. The pre-incident Emergency Plan will involve establishing points of contact and timely response options, facilitating emergency vehicle access throughout the site, creating a consistent marking protocol for the identification of system components that require special attention during an emergency, and developing appropriate Standard Operating Procedures or Standard Operating Guidelines for addressing on-site emergencies.

- The applicant should design, install and maintain the proposed project to meet all applicable minimum standards set forth in the National Fire Protection Association (NFPA)

70: National Electrical Code and all applicable minimum standards appropriate for ground-mounted solar facilities set forth in NFPA 1: Fire Code.

9. PERMITTING AGENCIES

It should be noted that the Mandatory Referral review process does not exempt any project from the need to meet the requirements of any other entitlement process. If applicable, the subject application will be required to receive final approvals from the following agencies as outlined below before the project can be implemented:

1. Prince George's County Planning Department:
    - Natural Resources Inventory Plan (NRI)
    - Type 2 Tree Conservation Plan (TCP2)

2. Prince George's County, Soil Conservation District (PGCSCD):
    - Erosion and Sediment Control Permit

3. Prince George's County Department of Permitting, Inspections and Enforcement (DPIE):
    - Site Development (Stormwater Management) Concept
    - Final Stormwater Management Plan Permit
    - Building Permit, Electrical Permit, Fence Permit and Commercial Solar Panel Permit

4. Prince George's County Historic Preservation Commission (HPC)
    - Historic Area Work Permit for any work proposed to be conducted in the Environmental Setting of a historic facility

STAFF RECOMMENDATIONS:

Staff supports the revised development concept for the proposed solar project and provide the following recommendations:

- The applicant should obtain an approved Historic Area Work Permit for the work required within the Environmental Setting of the Saint Barnabas Church, Oxon Hill and Cemetery Historic Site (PG76A-004).

- The applicant should stagger the planting of evergreen trees along the northern boundary of the solar array site.

- The applicant should reduce the plant units in the bufferyard along Saint Barnabas Road to a ratio of 80 plant units per each 100 linear feet of the perimeter of the fence.

- The applicant should replace *Mahonia aquifolium* (Oregon Grape Holly) with a Maryland native species.

- The applicant should replace the proposed six-foot chain link fence with a faux wrought iron fence enclosing the entire Saint Barnabas Solar Project site.

- Prior to the commencement of construction, the applicant should contact the Prince George's County Fire/EMS Department to request that a pre-incident Emergency Plan for their facility be conducted by the closest station to the site. The pre-incident Emergency Plan will involve establishing points of contact and timely response options, facilitating emergency vehicle access throughout the site, creating a consistent marking protocol for the identification of system components that require special attention during an emergency, and developing appropriate Standard Operating Procedures or Standard Operating Guidelines for addressing on-site emergencies.

- The applicant should design, install and maintain the proposed project to meet all applicable minimum standards set forth in the National Fire Protection Association (NFPA) 70: National Electrical Code and all applicable minimum standards appropriate for ground-mounted solar facilities set forth in NFPA 1: Fire Code.

- The applicant should submit a Development Concept Plan for Phase 2 of the project with required information for staff review at the Full Level.