



July 21, 2026

Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street
Baltimore, Maryland 21202

RE: Halo Betterton Community Solar Project

Dear Commissioners:

On behalf of the Eastern Shore Land Conservancy (ESLC), I respectfully submit these comments regarding the proposed Halo Betterton Community Solar Project.

ESLC supports Maryland's efforts to expand renewable energy generation and strengthen the State's energy resilience. Our comments should not be interpreted as opposition to solar energy. Rather, they reflect concerns regarding the proposed location of this project and the long-term implications for the Town of Betterton, local land use planning, and the efficient use of public infrastructure investments.

At issue is not whether Maryland should pursue renewable energy development. The question is whether this particular site represents the highest and best use of a uniquely valuable parcel that has been the focus of decades of local planning and public investment.

This property possesses characteristics that planners, local governments, and state agencies consistently identify as ideal for future growth.

The parcel is contiguous to the Town of Betterton and located adjacent to existing residential and commercial development. It is served by public water and sewer infrastructure that was extended with support from public investment. The Town possesses available wastewater treatment capacity capable of accommodating future development. The property is situated along the community's primary transportation corridor, near public amenities including Betterton Beach, public recreation facilities, and existing neighborhoods.

There are few sites in Kent County, or the Upper and Mid-Shore region generally, that combine these attributes.

For decades, the Town planned for this property as an area of future residential and mixed-use growth. The land was annexed into the municipality, designated for development through local planning efforts, and incorporated into long-term infrastructure planning. These actions were not isolated decisions. They were the result of a sustained commitment by local elected officials, planners, citizens, and state partners working toward a shared vision for Betterton's future.





That vision remains particularly important today.

Today, the rationale for preserving this opportunity is even stronger than when these planning decisions were originally made.

Kent County is beginning to experience development pressures that were largely absent only a few years ago. Maryland has elevated housing production as a statewide priority, while both state and federal policy initiatives have sought to reduce barriers to new housing development and increase the supply of homes in communities where infrastructure already exists. At the same time, transportation improvements in neighboring Delaware, including the Middletown Bypass, have improved regional connectivity and shortened travel times between northern employment centers and communities in Kent County.

These trends are increasing the attractiveness of towns such as Betterton for future residential investment. Communities that possess available water and sewer capacity, existing public services, and a planned framework for growth are particularly well positioned to accommodate a share of this demand. Betterton is one of the few places in the region where those conditions already exist.

The State and Town have spent decades preparing for this opportunity. Public infrastructure was extended, capacity was preserved, annexation decisions were made, and local plans were adopted with the expectation that this land would eventually support community growth. Converting the property to a utility scale solar facility at precisely the moment when market conditions are becoming more favorable for development would significantly diminish the public return on those investments.

In many respects, this parcel represents the culmination of a long-term public strategy. The infrastructure is in place, development interest in the region is increasing, and the Town has identified this property as one of its most important opportunities for future housing and mixed-use growth. Preserving that opportunity allows Betterton to realize the economic, fiscal, and community benefits envisioned through decades of local planning and state investment.

Maryland continues to face a significant housing shortage. At the same time, many communities lack sufficient water and wastewater capacity to support new housing opportunities. Betterton is among the relatively few communities that possesses both the infrastructure and capacity necessary to accommodate additional growth.

This parcel therefore presents a rare opportunity to advance multiple State objectives simultaneously.

Maryland's Planning Visions and Sustainable Growth policies emphasize directing growth to existing communities, utilizing existing infrastructure efficiently, supporting economic prosperity, expanding





housing opportunities, strengthening community vitality, and maximizing the return on public investments. This property aligns with each of those objectives.

Development of this site for housing and mixed-use purposes would place new residents and businesses within an existing community where infrastructure is already available. It would broaden the Town's tax base, support local businesses, improve utilization of existing public assets, and create opportunities for additional housing in a region where such opportunities are increasingly limited.

The opportunity cost of converting this parcel to a utility-scale solar facility is therefore substantial.

While renewable energy generation is an important public benefit, community solar projects are inherently flexible in their siting. Solar panels can be located on numerous properties throughout the region and still contribute to Maryland's renewable energy goals. By contrast, housing and mixed-use development opportunities are highly dependent upon infrastructure availability, location, public services, and compatibility with surrounding development patterns.

Those conditions exist on this parcel today.

From a land use and fiscal perspective, this site represents an exceptionally productive asset. Value Per Acre analysis, which measures the economic productivity of land by comparing the assessed value generated by a property to the number of acres it occupies, provides a useful framework for evaluating long-term community return on land use decisions. Such analyses consistently demonstrate that compact residential and mixed-use development generates substantially greater economic value, tax base, and municipal fiscal resilience per acre than low-intensity uses. In communities such as Betterton, where public investments have already been made in water, sewer, roads, and other infrastructure, directing growth to locations capable of generating higher value from those investments is particularly important. With existing infrastructure already in place, future development of this property would maximize the public return on investments previously made by both the Town and the State.

Once developed as a solar facility, this opportunity would likely be unavailable for decades.

The Commission's responsibility extends beyond evaluating energy generation alone. The public convenience and necessity standard necessarily requires consideration of broader public interests, including the integrity of local planning efforts, the stewardship of public infrastructure investments, housing needs, and the long-term vitality of Maryland's communities.

In Betterton, those interests point in a clear direction.

The Town has planned for growth. The State has invested substantial public resources in infrastructure needed to support that growth. Now, as housing demand and development interest on





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Maryland's Eastern Shore continue to increase, the community stands at the point where those investments can finally begin to generate the public benefits they were intended to produce.

This parcel represents precisely the type of location where Maryland's planning policies encourage growth to occur.

ESLC respectfully urges the Commission to carefully weigh the long-term community and economic value of this property against the benefits of siting a solar facility at this location. In our view, the public interest is best served by preserving this parcel for the housing and mixed-use development opportunities that local planning, state investment, and community vision have contemplated for decades.

Respectfully,

Owen Bailey
Director of Land Use and Policy
Eastern Shore Land Conservancy

