

Received via email on 28 February 2018.

As beekeeper, I wish to voice two concerns and suggest solutions. I'm hoping these will make sense to the workgroup and you can support these improvements to the solar scorecard and workgroup.

As these two issues stand now, they pose a conflict for the solar industry with the beekeeping community and the environmental community. **Its a simple and logical fix that will cost the solar industry nothing, yet yield strong support for solar projects going forward.**

Without these corrections, solar projects may meet with public objections from beekeepers at zoning hearings, and none of us want to see this wonderful program get derailed. We want no conflicts with the solar industry in Maryland! So fixing this now, is the best course.

1) **SCORECARD:** Currently, the workgroup is setting up a scorecard where a solar facility can claim a score to qualify as "pollinator friendly habitat." The problem is that the scorecard will allow the facility to qualify — even as “providing exceptional habitat” WITH the application of bee-harming pesticides on the habitat. This needs to be corrected by making it impossible to do both. We want to ensure that projects are protected from a contractor inadvertently applying a product they are accustomed to using or planting neonic-treated plants or seeds in the solar habitat that would kill the very bees we all want to help.

Without such a change, it would be better not to plant any habitat on solar farms, if that habitat is attractive to bees and is actually bee-killing because the facility owner or contractor used treated seeds and/or applications of insecticides that are known to harm pollinators.

**The math: a site can take maximum points on #1-8 and score 149 points, then use pesticides #9 and subtract 40 points (now scoring 109) and still meet habitat threshold of 70-84 points, even 85 which is supposed to qualify for “provides exceptional habitat” —yet can be a killing field!**

**THE FIX:** Last year, the Maryland General Assembly **with strong bipartisan support** passed a pollinator habitat definition that prohibits bee-harming pesticides--any pesticide labelled harmful to bees and any neonicotinoid-containing pesticides, treated seeds or plants--in designated pollinator habitat on state land overseen by 3 state agencies. ([SB386](#) / HB 830)

**Guidelines for habitat on solar farms should at least align with what is required on state land to truly protect and help our bees and ensure pollinators thrive.**

**We ask that the definition now in state law, should be the definition and criteria that the solar industry aligns with.**

Here is a link to SB386/HB830 State Pollinator Habitat law amendment (which we want adopted for solar):

<http://mgaleg.maryland.gov/webmga/frmMain.aspx?pid=billpage&tab=subject3&id=sb0386&stab=01&ys=2017RS>

Our press release: **SB 386/HB 830** <http://www.mdpestnet.org/2017-pollinator-habitat-bill-signed-law/>

Here is a link to the solar pollinator habitat law:

<http://mgaleg.maryland.gov/webmga/frmMain.aspx?pid=billpage&stab=01&id=sb1158&tab=subject3&ys=2017rs>

**2) WORKGROUP COMPOSITION:** Currently there is no beekeeper representation. How can you not have beekeepers who are the ones who are on the ground managing bees as a daily activity, with a wealth of practical experience and knowledge on this workgroup? Moreover, it should include beekeepers who are particularly knowledgeable about the impacts of pesticides, bee forage preferences and numerous other important topics. IUMD folks are scientists, and while they keep bees for research, they have a different focus and experience with funded research projects—this is very different from the day-to-day concerns and experiences of the regular beekeeper.

**THE FIX:** We propose that 2 beekeepers are added: Steve McDaniel, a Master beekeeper of 35 years (past president of Maryland State Beekeepers, Central Maryland Beekeepers and board member of Carroll Co. Beekeepers; Steve is also a Harvard-trained chemist) and Dr. Luke Goembel, a PhD chemist and beekeeper. They are both well-qualified, having worked on State pollinator protection and habitat bill, understand bees, pesticide issues and habitat needs very well and are willing to donate their time to serve on this workgroup.

We respectfully ask they be added to the workgroup to represent the beekeepers' perspective.

Thanks,  
Bonnie

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