



Audubon MARYLAND-DC

Ben Grumbles, Secretary,
Maryland Department of Environment,
1800 Washington Boulevard,
Baltimore, MD 21230
ben.grumbles@maryland.gov

State Office
Patterson Park Audubon Center
Important Bird Areas Program
2901 East Baltimore Street
Baltimore, MD 21224
Tel: 410-558-2473
<http://md.audubon.org>
December 12, 2018

RE: MD Solar 1 LLC, Shugart Valley Place project, Charles County

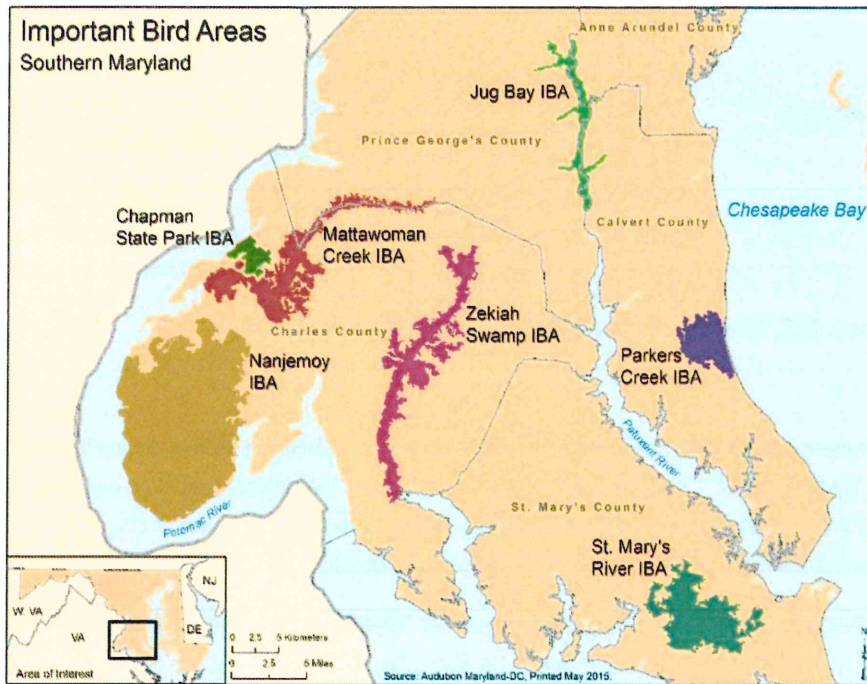
Dear Secretary Grumbles,

I am writing to express deep concern about the solar power project at 4850 Shugart Valley Place in Charles County being proposed by MD Solar 1 LLC on behalf of Georgetown University, and to request a public hearing before a Letter of Authorization is issued for the project. Audubon Maryland-DC is one of 22 state programs of the National Audubon Society with approximately 9,000 members in Maryland.

Audubon's concern about the Shugart Valley Place project (hereafter "the Project") stems from its likely impact on the water quality of the two Tier 2 streams traversing the site, and on forest resources and Forest Interior-Dwelling Species of bird (FIDS), both at the site scale via direct habitat loss and at the landscape scale via habitat fragmentation. Audubon is very much in favor of renewable energy as a strategy to combat climate change, which we recognize as one of the greatest long-term threats to birds, and we applaud Georgetown University for pursuing solar power as an alternative to fossil fuels. Hence we do not oppose this solar project because of its essence or intent, rather we oppose it because it is in the wrong place and, as such, will cause significant ecological damage to the largest forested landscape remaining in Southern Maryland.

The Project is located in a forested land parcel and will require the clearcutting of 240 acres of forest to make way for the installation of 100,000 solar panels, which will generate 32.5 MW of electricity. The forest at the project site is contiguous with forests across southwestern Charles County, which together make up the largest densely forested landscape in Southern Maryland. Because of its forested landscape context the Project site lies within a Green Infrastructure hub and is also identified by Maryland Department of Natural Resources as a Targeted Ecological Area (TEA). TEAs represent the most valuable ecological landscapes in Maryland and are targeted by Program Open Space for conservation acquisition.

The Project site is also located within the Nanjemoy Important Bird Area (see map below). Important Bird Areas (IBAs) are sites identified by Audubon that support significant populations of bird species considered vulnerable (see <http://md.audubon.org/conservation/southern-maryland-important-bird-areas-inform-land-use-planning>). The National Audubon Society has identified Important Bird Areas throughout the United States as part of a global program coordinated by Birdlife International. Nanjemoy IBA is of statewide importance for FIDS and supports significant populations of six bird species that are at-risk nationally: Bald Eagle, Eastern Whip-poor-will, Prothonotary Warbler, Worm-eating Warbler, Prairie Warbler and Wood Thrush. The Project site is located within an area that was added to Nanjemoy IBA in 2011 after "Bird Blitz" surveys conducted by Audubon volunteers in 2010 demonstrated that the forest bird community there was comparable to the IBA as a whole.



The Environmental Review of the Project states that most of the forest at the site was timbered between 1994 and 2010 (Project Overview, page 1). Thus the habitat is currently regenerating early successional forest between eight and 24 years old. This is ideal habitat for the at-risk species Eastern Whip-poor-will and Prairie Warbler, and indeed a whip-poor-will was detected just north of the property during the 2010 Bird Blitz surveys. As habitat succession proceeds at the site the forest will become suitable for the full range of FIDS inhabiting Nanjemoy IBA.

The Bird Blitz surveys in 2010 also detected a Prothonotary Warbler where a tributary of Wards Run crosses Highway 425, indicating that Wards Run is flanked by bottomland hardwood forest of mature age and significant ecological value.

The deforestation required by the Project would permanently remove 250 acres of forest from Nanjemoy IBA/TEA and would expose the adjacent bottomland hardwood forests along Wards Run to biotic and abiotic edge effects that would degrade the wetland habitats and water quality of two Tier 2 streams. Invasive plant species and increased run off and erosion are of particular concern. The applicant's Environmental Review Document claims that the solar project would function hydrologically as a forested site but this is very unlikely.

At the landscape scale the Project would increase the fragmentation of Nanjemoy's ecologically valuable forests. Habitat fragmentation is a huge problem in Maryland which has degraded forests in recent decades by increasing invasive plant species, deer populations and other edge effects. The Nanjemoy region is still blessed with extensive intact forest, a major reason why it is identified as a TEA - this solar project undermines that status.

The project is so inappropriately located it is difficult to understand how this forested site was selected when so many more appropriate sites, on open ground in unforested landscapes, are available across the state of Maryland.

Finally, the project would set a terrible precedent for cutting down forest to construct solar installations. Removing forest as part of a strategy to reduce carbon emissions is grossly counter-productive, and the irony will not be lost on Audubon's network of advocates or indeed Maryland's wider public who care deeply about implementing genuine solutions to climate change.

I urge you not to issue a Letter of Authorization for this project, but to hold a public hearing on the proposal or to encourage the Applicant to withdraw the proposal in favor of finding a more suitable site for the project.

Sincerely,

A handwritten signature in cursive script that reads "David Curson".

David Curson, PhD
Director of Bird Conservation and Interim Executive Director
dcurson@audubon.org

cc: Jeff Thompson, Division Chief, MDE Central Region
Denise Keehner, Program Manager, MDE Wetlands and Waterways Program