Ben Grumbles, Secretary
Jeffrey Thompson, Chief, Non-tidal Wetlands and Waterways
Central Region Section
Maryland Department of Environment
1800 Washington Boulevard
Baltimore, MD 21230
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Re: Shugart Solar Project – Stream and Wetland Permit 18-NT-0323/201861760

Dear Secretary Grumbles and Mr. Thompson:

As you are presumably aware, this project proposes to cut down 249 acres of mature second growth forest adjacent to and partially within the 100-year flood plain of Ward's Run. Ward's Run is a Tier II stream, with "limited assimilative capacity." This alone should sufficient to deny a Stream and Wetlands permit. Since forests make the best buffer for streams, the remove said means virtually all nitrogen, phosphorus, and other pollutants will flow into Ward's Run, and ultimately the Chesapeake Bay, as Ward's Run will be unable to assimilate those pollutants.

While it is irrelevant to a Stream and Wetlands Permit, the site falls within a state-designated Targeted Ecological Area, and is a recognized Important Bird Area (IBA). Members of the Maryland Bird Community, including myself, travel there to see the birds that inhabit the Nanjemoy and Mattawoman watersheds. The unbroken forest is important to Forest Interior Dwelling bird Species (FIDS) such as Wood Thrush, Ovenbird, Kentucky and Hooded Warblers. These species are considered Species of Greatest Conservation Need by Maryland's current Wildlife Action Plan. A solar array is totally unsuitable as breeding habitat for FIDS.

It is my sincere hope that you will deny the Stream and Wetland Permit, and indicate to Georgetown University that solar power should not be pursued at the expense of valuable forest habitat.

Respectfully submitted,

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