

VIA ELECTRONIC FILING

July 22nd, 2019

Jeff Thompson, Regional Chief
Nontidal Wetlands Division
Maryland Department of the Environment
1800 Washington Blvd.
Baltimore, MD 21230

Cc: Ben Grumbles, Secretary, Maryland Department of the Environment
Susan Dorsey, Assistant Secretary, Maryland Department of the Environment

Re: AI 18-NT-0323/201861760 – MD Solar 1, LLC (Shugart Valley Place), Joint Federal/State Application for the Alteration of Any Floodplain, Waterway, Tidal, or Nontidal Wetland in Maryland

Dear Mr. Thompson,

Audubon Naturalist Society and partners submit the following comments regarding AI 18-NT-0323/201861760 for MD Solar 1, LLC (Shugart Valley Place), located at 4850 Shugart Valley Place, La Plata, MD, 20646, in Charles County. Thank you for the opportunity to submit written comments.

I. The Party Commenting

Audubon Naturalist Society (ANS) is located at 8940 Jones Mill Rd, Chevy Chase, MD 20815. ANS is an environmental nonprofit organization committed to protecting land and water in Maryland, Virginia, and Washington, DC. For the past 122 years, ANS has helped countless residents of the DC region enjoy, learn about, and protect nature. We have over 10,000 members and supporters in the greater Washington, D.C. region, and have a history of advocating on behalf of the Potomac River and its many tributaries.

ANS and our partners submit these comments as interested parties to the permit process and request that notification of all further actions regarding this permit be sent to the address listed

Woodend Sanctuary | 8940 Jones Mill Road, Chevy Chase, Maryland 20815 | 301-652-9188

Rust Sanctuary | 802 Childrens Center Road, Leesburg, Virginia 20175 | 703-669-0000

anshome.org

above. **Based upon the issues discussed in this comment letter and associated public policy reasons, MDE must deny the Wetlands Permit requested by Origis Energy under COMAR 26.23.02.04(A)(2) and COMAR 26.23.02.04(D).** Permit denial is warranted because the regulated activity will not avoid and minimize adverse impacts to the non-tidal wetland. Rather, approval of the permit will destroy the habitat of endangered species, remove 240 acres of valuable forest cover, and degrade two Tier-2 streams located on the property. The application materials and proceeding arguments also present significant procedural concerns.

ANS appreciates MDE's most recent extension of the comment period and an opportunity to submit a second comment based on the antidegradation analysis and Social and Economic Justification ("SEJ") forthcoming from Origis Energy.

II. Background

In partnership with Georgetown University, Origis Energy ("Origis") seeks to develop a 537-acre, primarily wooded property into a solar farm, referred to as MD Solar 1. In the correct location, the project would be an important step in reducing our region's greenhouse gas emissions. However, Origis's proposed project location is in the Nanjemoy forested watershed, a sensitive and valuable environmental area.

Nanjemoy Forest is a unique ecosystem built by nontidal wetlands, streams, and innumerable trees that support the forest's immense wildlife diversity. Nontidal wetlands are essential to the protection of the Chesapeake Bay because of their ability to filter pollutants, reduce flooding and runoff from upland areas, and provide habitat to fish and other wildlife. Direct and indirect impacts to nontidal wetlands reduce their ability to clean water before it enters our streams and rivers. The wetlands in question depend on the surrounding ecosystem structure and biodiversity to function effectively. Origis's proposed project will cause habitat fragmentation that will damage Nanjemoy Forest and subsequently, the wetlands around Wards Run 1 and 2.

The project application only discusses the impacts to the wetlands and Wards Run 1 and 2 resulting from installation of access roads and power lines. The project application does not consider the direct impacts stemming from the removal of over 240 acres of upland trees. If MDE approves the MD Solar 1 project, Origis will destroy possible habitat for a listed endangered species, remove valuable forest cover, and degrade the two streams located on the property, which are both designated Tier II streams.

A Tier II stream in Maryland is a stream with water quality that exceeds the minimum designated water quality standards for that class of waters.¹ It is imperative that the quality of these streams is maintained, as they represent the highest quality water bodies remaining in the State (currently, Maryland has no Tier III waters which would be of outstanding quality).² MDE maintains a list of

¹ COMAR 26.08.02.04-1.A.

² *Id.*

Tier II waters at COMAR 26.08.02.04-10. Wards Run 1 and 2 are listed as Tier II waters and are both located within the project footprint. The streams will be negatively and permanently impacted by the construction and operation of MD Solar 1. In addition, Wards Run flows into Nanjemoy Creek, a Chesapeake Bay tributary. At a time when meeting the Chesapeake Bay TMDL goals are a top priority in Maryland, the State must ensure no additional, unnecessary pollution is entering the Chesapeake Bay.

III. PROCEDURAL CONCERNS

a. Lack of Transparency.

ANS and our partners appreciate MDE for having an open and public permitting process. However, Origis has not been similarly transparent with the public and instead has pitched MD Solar 1 as an environmentally friendly project despite environmental concerns presented by the public. Origis and Georgetown University have not candidly shared the extensive amount of damage Origis's use of this site will cause to the wetlands and surrounding ecosystems. Origis's lack of transparency and shared information prevents the public from full evaluation of the environmental damage that MD Solar 1 will cause.

The lack of transparency is also demonstrated through Georgetown University's unwillingness to communicate with community members, the public, and their students about the project, even when asked to do so. Prior to the first public hearing on the wetlands permit, the University claimed they had contracted the services of Eastern Research Group to conduct a third-party assessment of the environmental impacts of the project. Originally this report was set to be released mid- March 2019, to allow the public the opportunity to evaluate an independent assessment of the environmental resources at risk of loss. The report has yet to be released, despite multiple direct requests made by the public and concerned individuals, making it premature to move forward with permitting.

b. Climate change mitigation must not destroy the environment it seeks to protect.

The commenting groups understand, and passionately support, the need to reduce greenhouse gas (GHG) emissions throughout the State, region, and world. Our concern is not the State's potential choice to site a solar farm in Maryland, but the possibility that Maryland would prioritize solar development at the expense of its own forests and wetlands. We appreciate the efforts of the State and Governor Hogan to lead the country in reducing emissions through their participation in the Regional Greenhouse Gas Initiative, the Transportation Climate Initiative, participation in the U.S. Climate Alliance, and an increased renewable portfolio standard (RPS). Reducing GHG emissions is one of the most important steps in slowing climate change throughout our region.

The Shugart Valley Place property is an inappropriate location for the solar project because of the need to clear and significantly grade 240 acres of forest located within a state designated TEA

(Targeted Ecological Area), within a Charles County PPA (Priority Preservation Area³), and within the watershed of two Tier II streams. Removing forests, one of the most effective carbon sequestration mechanisms, is not the precedent Maryland should be setting during their fight for a healthy climate. In order to reduce GHG emissions at a level that will slow climate change, we need to switch to renewable energy *and* increase forest acreage throughout the State and country. There are numerous available properties in Maryland that are suited for the construction of solar panels, whose use would not degrade the environment our state has worked so hard to renew. Purchasers such as Georgetown University and the State of Maryland collectively have an obligation to find better places for renewable energy, such as rooftops, landfills, parking lots, brownfield sites, and degraded farm fields. We need all the renewable energy we can get, so we need to make sure these early decisions set the right precedent to save our atmosphere and our land, air, and water as well.

c. The proposed project site is historically significant to Piscataway tribes of Maryland.

The area of the proposed project has been identified by the Accokeek Foundation and the National Park Service as land significant to Piscataway tribes of Maryland. In 2015, the Indigenous Cultural Landscapes study⁴ determined the probability of significant cultural resources located in the area north of Nanjemoy Creek. To this day, an archaeological study has not been completed to determine the level of historical significance the area holds. Further evaluation of additional cultural resources by Piscataway tribes of Maryland is necessary before the land is altered in any way.

The local community and native groups are well aware that this land has been the home of the Piscataway tribes of Maryland for millennia.⁵ Given the historical injustices suffered by indigenous peoples, it is essential that developers consult with members of Piscataway tribes of Maryland to protect their right to free, prior, and informed consent, which has been previously denied.⁶ Although MDE is not specifically required to consider the land's significance to local tribes, the tribe has a right to self-determine the land's significance to their culture under the U.N. Declaration of Rights for Indigenous Peoples.⁷ Piscataway evaluation of the land *must* be an important factor in the siting and alternative location evaluations for this project.

³ *Priority Preservation Areas Map*, https://www.charlescountymd.gov/sites/default/files/pgm/rim/priority_preservation.pdf.

⁴ Scott M. Strickland, Virginia R. Busby, Julia A. King, *Indigenous Cultural Landscapes Study for the Nanjemoy and Mattawoman Creek Watersheds*, <https://www.nps.gov/chba/learn/news/upload/NanjemoyMattawoman-ICL-FINAL-red.pdf>.

⁵ *Id.*

⁶ *United Nations Declaration of Rights for Indigenous Peoples*, Pg. 3, https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf.

⁷ *Id.*

d. The documents on MDE’s webpage are misleading, inconsistent, and incomplete.

All of the instances described below act to hinder public participation in the development process by reducing the quality of the information available for review and comment by the public.

- *No information regarding alternative site analyses.* The Application states that 2-4 sites were analyzed⁸ but does not include any additional information/documentation identifying those sites and why they were disqualified. MDE and the public cannot adequately review this analysis without this information.
- *No information regarding the project’s goal and purpose of providing energy to Georgetown University.* The Application in the Purpose⁹ section makes no mention of Georgetown or any agreements between Georgetown, the property owner, and the Origis. Part 7.F. of the application states that the project will “serve local residents” but again makes no mention of Georgetown University. Furthermore, in Appendix II Detailed Project Description there is again no mention of Georgetown University and the purpose of this project to provide energy to the University. The public, when reviewing projects of this nature has a right to know about the actual purpose and goal of the project.
- *The Application is incomplete.* At Part 3.A.d “State stream use class designation,” there is no entry as to the designated uses of the impacted streams within the project area. Designated uses¹⁰ inform the water quality criteria that must be maintained in a water body to support those uses. The public has a right to know the designated uses of waterbodies within project area.
- *The Detailed Project Description¹¹ has two other issues.* Firstly, it does not discuss or contain information related to offsite alternatives that were analyzed for this project. Secondly, the language of this document recommending the proposed course of action and its direct and “unavoidable” impacts on wetlands and water quality contradicts the findings of ECS Mid-Atlantic in the Wetlands Delineation and Preliminary Waters of the U.S. Determination¹². In their determination, ECS recommends in multiple instances that the project should avoid sensitive areas such as wetlands, wetland buffers, stream channels, and stream buffers.¹³ MDE also stated that water quality and preserving full wetland function were top priorities for this project¹⁴, however the current proposal does not align with these priorities nor does it adequately describe or provide sufficient additional information to support authorization of impacts to wetlands and other sensitive areas.

⁸ *Wetlands Permit Application*, pg. 5, Part 6, 9/12/2018.

https://mde.maryland.gov/programs/Water/WetlandsandWaterways/Pages/MD_Solar_1.aspx

⁹ *Id.* at pg. 2 Part 2.d.

¹⁰ COMAR 26.08.02.02.

¹¹ *Wetlands Permit Application*, Appendix II.

¹² *Wetlands Permit Application*, Appendix I.

¹³ *Id.* at pg. 4, 18, and 28.

¹⁴ *Id.* at pg. 32.

e. Absence of MDE-required Anti-Degradation Study and Social Economic Justification.

Federal law mandates that the State of Maryland have an anti-degradation procedure. The purpose of anti-degradation regulations is to ensure that water quality is maintained and that discharges into high quality waters are evaluated to determine if they will degrade water quality.¹⁵ Maryland anti-degradation procedure is predicated on federal regulations that provide tiered protective standards.¹⁶ These standards use three (3) tiers: Tier I protects “existing uses”; Tier II protects waterbodies considered high-quality or that exceed existing goals; and Tier III protects outstanding or pristine waterbodies.¹⁷

Maryland’s antidegradation policy states that:

“Certain waters of this State possess an existing quality that is better than the water quality standards established for them. The quality of these waters shall be maintained unless: (1) The Department determines a change in quality is justifiable as a result of necessary economic or social development; and (2) The change will not diminish uses made of, or presently existing, in these waters.”

MDE made the determination that Wards Run 1 and 2 are Tier II waterways and importantly, that Wards Run 1 does not have any remaining assimilative capacity to persist as a Tier II waterway if pollution enters the stream. Due to the lack of assimilative capacity, MDE asked Origis to complete an SEJ indicating the necessity of further degrading the stream.

ANS and our partners expect MDE to follow the anti-degradation policy laid out by the State. Thus far, the documents made available by MDE¹⁸ for review do not contain information related to any level of antidegradation review conducted by the applicant to determine the project’s potential to impact the Tier II streams in the project area. Without the listed documents available, we cannot comment regarding their contents. For this reason, we will reserve our substantive comments regarding anti-degradation until the studies are released. We appreciate that the State has extended the comment period to give the public an opportunity to review these documents once submitted. *ANS and our partners expect that we will supplement these comments with additional analysis of the anti-degradation review at such time as the documents are made available.*

IV. MDE must deny the Wetlands Permit because the proposed project application does not meet the Criteria for Review of Nontidal Wetland Permit Applications.

¹⁵ COMAR 26.08.02.04 and 26.08.02.04-1; 40 CFR 131.12.

¹⁶ 33 USCS § 1313(d)(4)(B); 40 CFR 131.12(a); COMAR 26.08.02.04.

¹⁷ 40 CFR 131.12(a)(1)-(3).

¹⁸ Application Materials,

https://mde.maryland.gov/programs/Water/WetlandsandWaterways/Pages/MD_Solar_1.aspx.

Under COMAR 26.23.02.04(A)(2), a regulated activity must first work to avoid and, if not possible, minimize all adverse impacts to the nontidal wetlands in question. The proposed project application fails to review the impacts of forest removal on degradation to Maryland Tier II streams and impacts of conversion of nontidal wetlands to emergent wetlands. The Application materials therefore do not satisfy the requirements of this regulation. Furthermore, the application does not describe the minimization steps that will be taken regarding the upland re-grading and tree removal. Although Origis illustrates some minimization of their impact to the waterways and surrounding wetlands, Origis did not adequately consider alternative sites that would have avoided impact altogether before yielding towards minimization.

Under COMAR 26.23.02.04(D), the applicant shall demonstrate no practicable alternatives to the proposed project siting and configuration. Here, Origis simply claims no practicable alternatives without a detailed explanation or demonstration of the sites reviewed. It is understandable that a site location in Charles County would allow for the company to have close proximity to transmission lines; however, without an adequate review of alternative sites, MDE cannot grant a permit for a site with nontidal wetlands and two Tier II streams.

V. MDE must deny the Wetlands Permit because the proposed project will remove 240 acres of forest.

Nanjemoy Forest is essential to the well-being of the entire Chesapeake Bay community and is the largest remaining forest in Southern Maryland. Origis proposes to grade and clear cut 240 acres of the forest, directly threatening two Tier II streams, while failing to acknowledge tree removal when discussing impacts to the wetland area. Origis and its contractors mischaracterized the quality of the forest on the property as “scrubby and poor” upon site inspection.¹⁹ When the Maryland Power Plant Research Program visited the site, they determined that the property’s trees were in actuality “large, mature trees.”²⁰ In addition, the Department of Natural Resources’ testimony before the Public Service Commission contained errors and omissions, inaccurately stating that the parcel is not in a PPA (Priority Preservation Area) and failing to consider that the parcel is in a TEA (Targeted Environmental Area). Furthermore, the Department of Natural Resources overlooked Chapter 5 of the Charles County Comprehensive Plan, which prioritizes the preservation of Charles County’s last few remaining large forested parcels.

The forest surrounding Wards Run 1 and 2 is essential to the health of these Tier II streams. During storm events, the root systems of trees and forest undergrowth slow down and absorb rainwater, preventing the water from rushing into waterways. If the water were to flow directly into Wards Run without the filtration assistance of the forest, the water would carry increased sediment into the wetlands and streams. Sediment is a listed pollutant, and an increase in sediment load would

¹⁹ *Environmental Review Document Project NO. 16009.00*, H&B Solutions, LLC, Pg. 1 and pg. 11, <https://georgetownvoice.com/wp-content/uploads/2018/12/HB-Solutions-Environmental-Review.pdf>.

²⁰ *Project Assessment Report for Maryland Solar 1 (Shugart Valley Place Solar)*, MD Dept. of Nat. Res., pg 12., <http://dnr.maryland.gov/pprp/Pages/default.aspx>

degrade Wards Run beyond its assimilative capacity. The importance of trees is even more significant for sites like this one with high topographic variation, where slope stability of stream beds is already reduced, making the streams vulnerable to erosion by concentrated rainwater flow. This problem will be made worse by the presence of planned solar panels, which will act as impervious surface, concentrating the natural soaking of rainwater into the ground to fewer areas. Species dependent on high quality water to survive, as detailed below, will be further threatened, and Maryland will need to account for the increased sediment loading in TMDL considerations.

In addition, deforesting significant portions of land and replacing that space with solar panels has the potential to create hot spots where high temperatures will place wildlife at risk and alter the balance of Nanjemoy's ecosystem. The Nanjemoy Forest is an area that provides vital carbon sequestration for the District of Columbia and produces the oxygen that we all breathe. This project will cut a hole in the "lungs of DC," having far-reaching predictable and unpredictable negative impacts on quality of life for DMV residents. The proposed deforestation will also cause damaging forest fragmentation, discussed below, and interrupt the contiguous habitat needed by many bird species to survive.

VI. MDE must deny the Wetlands Permit because the proposed project will permanently degrade the two Tier II streams located on the property.

The purpose of designating and investigating any alteration to Tier II streams in Maryland is to prevent the degradation of Maryland's highest quality streams. Maryland regulations require that permitted activities upland of Tier II streams be subject to review. MDE explains on their website that to protect our high-quality streams "ample watershed forest cover, sufficient riparian buffers, and lower levels of impervious cover are essential."²¹

In the evaluation provided by Origis to the Public Service Commission, Origis argues that because they have agreed to keep any land disturbances other than the direct disturbances listed in the project application past a 35ft distance, the jurisdictional waters of Wards Run and surrounding wetlands will not be affected. However, the property will need to be cleared of trees and significantly graded to remove slopes, which will generate both sheet flow and sediment runoff that will erode and fill the two streams and then flow into the Chesapeake Bay.

Origis's argument that a 35ft buffer will be sufficient to protect the stream from 240 acres of runoff is false. Increased stormwater runoff due to deforestation was not considered when implementing a 35ft buffer, which will not prevent sediment loading and erosion of Wards Run I and II. Based on review of Origis's arguments, MDE must deny the wetland permit based on Maryland's anti-degradation policy for Tier II streams and their surrounding wetlands.

²¹ *Tier II Review: Nontidal Wetlands and Waterway Construction*, <https://mde.maryland.gov/programs/Water/TMDL/WaterQualityStandards/Pages/Tier-II-Wetlands-Waterways.aspx>

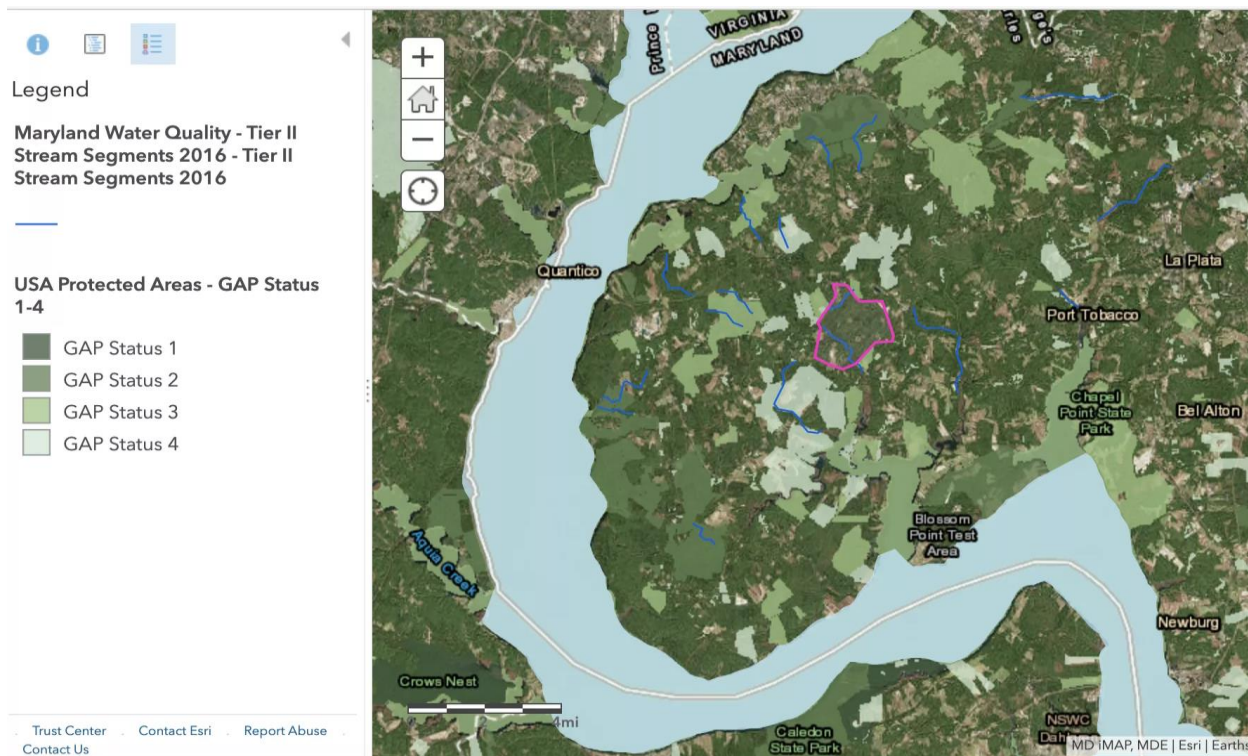


Figure 1: Location of project area (boundaries are approximate) within the broader Nanjemoy Forest, showing protected areas nearby and Tier II stream segments.

VII. MDE must deny the Wetlands Permit because the proposed project will permanently destroy the habitat of several locally listed bird species and one endangered mussel species.

The nontidal wetland regulations require that MDE consider adverse impacts to wildlife and their habitat and the extent to which the project has avoided or minimized these impacts, including “harm to a threatened or endangered species or species in need of conservation, or to the critical habitat of these species.”²² The proposed project site is near one of the only remaining homes of the Dwarf Wedge Mussel, which has been listed in federal databases as endangered since 1990.²³ One of the biggest causes of the reduction in the species’ abundance is siltation and sediment loading, which inhibits the animal’s ability to filter feed.²⁴ Studies have not yet been able to determine whether or not the Dwarf Wedge Mussel is present in Wards Run, although the stream and its branches are tributaries of Nanjemoy Creek, where the Dwarf Wedge Mussel resides.²⁵ There is also a possibility that the mussel has moved upstream towards Wards Run. Increased sedimentation into Wards Run because of tree removal on the project site increases the likelihood

²² COMAR 26.23.02.05(B)(3)(b).

²³ G. Andrew Moser, *Dwarf Wedge Mussel Recovery Plan* (1993)

<https://www.fws.gov/northeast/pafo/pdf/Dwarf%20wedgemussel%20Recovery%20Plan.pdf>

²⁴ *Id.* at 12

²⁵ *Id.* at 7

of sediment moving downstream to Nanjemoy Creek, placing the Dwarf Wedge Mussel in harm's way.

In addition to the Dwarf Wedge Mussel, two bird species on the Maryland Species of Greatest Conservation Need list, the Wood Thrush and the Worm Eating Warbler, are common visitors to the Forest and project site.²⁶ Nanjemoy Forest is listed as one of the National Audubon Society's Important Bird Areas and as one of Maryland's DNR Chesapeake Bay Critical Area Commission for the conservation of forest interior dwelling bird (FIDS) habitats. There is a total of six at risk bird species found in the Nanjemoy forest. These species are: the Wood Thrush, the Worm-eating Warbler, the Prothonotary Warbler, the Prairie Warbler, the Eastern Whip-poor-will, and the Bald Eagle.²⁷ The listed bird species, save for the Prairie Warbler, all depend on dense, contiguous forests habitat in order "to breed successfully and maintain viable populations."²⁸ Fragmentation of this habitat will endanger bird communities with the possibility of decreasing the region's biodiversity. Maintaining a larger pool of biodiverse organisms is one of the best practices we have to create resilient ecosystems in the face of climate change.

Without an adequate minimization analysis in relation to affected bird and mussel species, MDE may not permit the proposed activity in the nontidal wetland. Origis's analysis should have provided MDE information on the Dwarf Wedge Mussel and each bird species and how all possible efforts will be made to avoid impacts to these sensitive creatures. All species will be impacted by not only the direct stream and wetland degradation, but also the forest fragmentation and sediment pollution that will come with the removal of upland trees.

VIII. Conclusion

Maryland must not develop its solar infrastructure at the expense of destroying the State's forests and wetlands that provide invaluable ecosystem services. Approving this permit will permanently destroy: 240 acres of Nanjemoy Forest, two Tier II streams, habitat to several locally listed and endangered species, and land of cultural significance to the Piscataway peoples. Moreover, destroying the high value trees in Nanjemoy Forest will eliminate a critical buffer for pollutants that would otherwise enter two Maryland Tier II streams and the Chesapeake Bay.

Most importantly, allowing the MD Solar 1 project to move forward would set a dangerous precedent in Maryland for the replacement of forests with solar panels. The value of forests to human and animal life places them on equal ground with renewable energy sources such as solar. It is crucial that when mitigating climate change and making our communities more resilient and adaptable to its impacts, we not promote one best practice at the expense of another. MDE must

²⁶ *Maryland Species of Greatest Concern*, pg. 96,

https://dnr.maryland.gov/wildlife/Documents/SWAP/2005_MWDC_Plan.pdf

²⁷ Audubon Maryland – DC, *Nanjemoy Important Bird Area*

http://md.audubon.org/sites/g/files/amh621/f/nanjemoy_iba_updated_jan2019.pdf

²⁸ MD DNR, *A Guide to the Conservation of Forest Interior Dwelling Birds in the Chesapeake Bay Critical Area*, https://dnr.maryland.gov/criticalarea/Documents/forms_navbar/tweetyjune_2000.pdf

deny the Nontidal Wetlands Permit to Origis under COMAR 26.23.02.04(A)(2) and COMAR 26.23.02.04(D) because the permit application does not adequately analyze the threats to the local ecosystem of Nanjemoy Forest. Notably, the application is also devoid of any substantive discussion of alternative project sites to avoid or minimize environmental harm. Without this analysis, Origis and Georgetown University are hiding from the public the true cost of MD Solar 1. This lack of transparency is further exacerbated by Georgetown University's failure to release its own independent impact assessment for the project.

Public policy and regulatory procedure demand that this permit be denied. ANS appreciates the opportunity to comment on the Wetland Permit Request and looks forward to working with MDE in the future.

Sincerely,

Eliza Cava, Director of Conservation
Denisse Guitarra, MD Conservation Advocate
Ari Eisenstadt, DC Conservation Advocate
Audubon Naturalist Society
8940 Jones Mill Road
Chevy Chase, MD 20815
Phone (301) 652-9188

David Curson, Ph.D.
Director of Bird Conservation and Interim Executive Director
Audubon Maryland-DC
2901 E. Baltimore St.
Baltimore, MD 21224
Phone (410) 558-2473

Anne Lewis, FAIA, President
Jim Monsma, Executive Director
City Wildlife, Inc.
15 Oglethorpe Street, NW
Washington, DC 20011
Phone (202) 333-4388

Emily Ranson
Maryland Program Coordinator
Clean Water Action
1120 N Charles Street, Suite 415
Baltimore, MD 21201
Phone (410) 235-8808

Valarie Proctor
Piscataway and Environmental Activist

Gabrielle Tayac, Ph.D.,
Piscataway Historian

Austen and Mary Pat Doherty
Nanjemoy Residents

Alex Winter
Bryans Road
Charles County Resident

Joel Merriman
Vice President and Chair, Conservation & Advocacy Committee
DC Audubon Society

Kurt Schwarz
Conservation Chair
Maryland Ornithological Society

Linda Redding
Nanjemoy Resident

Laurie Snow
President
Mattawoman Watershed Society

Bonnie Bick
Chapman Forest Foundation
7601 Oxon Hill Road
Oxon Hill, MD. 20745

Samantha Panchevre
Georgetown University School of Foreign Service 2019

Victoria Ma
Georgetown University Master of Public Policy 2020
GUClimateInjustice Organizer

Deanna Wheeler
Nanjemoy - Potomac Environmental Coalition, Inc.

Kimberly Golden Brandt
Director
Smart Growth Maryland

Loretta d'Eustachio
Nanjemoy Vision

Dave Wilson
Conservation Community Consulting

Marney Bruce
Member and Past President
Maryland Native Plant Society

Maj-Britt Dohlie
Michael J. Evenson
Members
Conservation Montgomery
Chevy Chase, MD, 20815

Paulette Hammond
President
Maryland Conservation Council

Anne Stark
Waldorf
Charles County Resident

Bob Lukinic
Conservation Chair
Southern Maryland Audubon Society

Hal Delaplane
President
Conservancy for Charles County

Krista Schlyer
Conservation Photographer
Author of River of Redemption: Almanac of Life on the Anacostia.

Beth Decker
Director
Safe Skies Maryland

Edward R. Joell
Resident
Indian Head, MD

Karen Rohan.
Author and Trained Animal Rescuer
517 Lincoln St, Rockville, MD 20850