

August 22, 2019

Ben Grumbles, Secretary
Jeffrey Thompson, Chief, Non-tidal Wetlands and Waterways
Central Region Section
Maryland Department of Environment
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Re: Shugart Solar Project - Social and Economic Assessment

Dear Secretary Grumbles and Mr. Thompson:

Representatives of our organizations have attended both hearings on the Shugart Solar Project and have now read the complete Social and Economic Assessment (SEA) prepared by Origis Energy for MDE. We are grateful for the time and attention you have given this project and for MDE's request for a Social and Economic Assessment from the applicant.

However, we still oppose this project and do not feel the applicant's Social and Economic Assessment has provided sufficient justification for removing 249 acres of valuable forest habitat in this environmentally sensitive bird area. Moreover, the community has still not received Georgetown University's promised independent ecological analysis, even though it was apparently completed several months ago.

For these reasons, we believe this project should not receive final approval from MDE.

- Lack of valuation for the ecosystem services of bird habitat:

As has been repeatedly pointed out during testimony at the public hearings, this part of Charles County is a state-designated Targeted Ecological Area (TEA). TEA's are the State of Maryland's designation for its most valuable and environmentally sensitive areas. The Nature Conservancy and the National Audubon Society have both recognized Nanjemoy as a prime conservation area in part because of its large amount of contiguous forest that provides habitat for numerous species of birds, including the vulnerable Forest Interior Dwelling Species (FIDS). A number of these birds are included in Maryland's federally-mandated *Wildlife Action Plan* as Species of Greatest Conservation Need (SGCN), targeted for special conservation efforts.

Yet the SEA submitted by Origis Energy makes no mention of birds. “Section 8: Provision and Replacement of Ecosystem Services” focuses entirely on stream and wetland preservation and the provision of pollinator plantings in its analysis of “Wildlife Habitat and Biodiversity.” While these do help support bird life, they do not provide nest sites for most birds, a key component of bird habitat; thus, bird breeding can be expected to be largely eliminated from the solar area of this site. This consequence is not mentioned in the Assessment, nor has any economic value been assigned to this important ecosystem service.

Yet birding in the US has substantial economic value and the Nanjemoy area is a destination for many birders and scientists. Revenue from birding in the US adds \$41 billion dollars to the national economy, including \$14.9 billion that local economies reap from the monies birders spend on food, lodging, and transportation.¹ In 2011, The US Fish and Wildlife Service determined that 660,000 jobs were created as a result of bird watching expenditures. A notional value of these economic benefits should have been included in the economic analysis of ecosystem services in the SEA.

- Georgetown University’s promised independent ecological report

In February, Georgetown University promised the community that it would commission an independent ecological report on the project, and that it would share the report with the community. We have been advised that the report was completed several months ago, but Georgetown now claims that is not free to release the results of this report. Georgetown’s new reluctance raises concerns that there may be negative findings in the report that Georgetown does not wish to share.

Therefore, we strongly urge MDE to require Georgetown to submit its independent report for the record so that whatever findings are in the report are included in the analysis.

We are aware that the State of Maryland is studying legislation to define criteria for the siting of solar farms such as this one. We hope that the State will determine that it is counterproductive to permit this use on forested or agricultural land, and that the appropriate and environmentally sound location for solar collectors is as a secondary, but important, feature on existing or planned projects that are part of the built environment, or on unproductive brownfield lands. We fear that if the Shugart project is constructed, it will set a dangerous precedent for other ecologically valuable areas and result in a serious depletion of our nation’s valuable forests.

For these reasons, we urge MDE not to approve this project. Thank you for your consideration.

¹ US Fish and Wildlife Service, *Birding in the United States, A Demographic and Economic Analysis*, Addendum to the 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, December 2013.

Respectfully submitted,

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