

COMMENTS TO:

MARYLAND DEPT OF ENVIRONMENT

REGARDING:

A SOCIAL & ECONOMIC ASSESSMENT OF THE SHUGART SOLAR PROJECT

SUBMITTED:

ON THE BEHALF OF THE SOUTHERN MARYLAND AUDUBON SOCIETY

The Social & Economic Assessment of the Shugart Solar Project has recurring conflicting statements that are misleading and/or direct from the facts the lack of social and economic justification this project needs to proceed. It shrouds the reality of the environmental degradation that will occur when this large tract of forest is destroyed. The report claims on page 3 it contains "fact-based outcomes."

The transformation of this forested site to 250 acres of barren tree stumps with replacement grass species will negate this site's greatest environmental asset. The statement on page 29 that "it will easily retain most of the notional ecosystem service value in place" is not fact-based. Its contribution to the area's ecosystem cannot be replaced if this project is allowed to be built. This tract is contained in one of the few remaining large contiguous forests that are a priority of Charles County's Comprehensive Plan to be kept intact. These acres are also designated a National Audubon Society Important Bird Area (IBA). These lands are well studied and evaluated by avian experts in order to have this distinction. This IBA's importance is its forest. The existing contiguous forests is crucial to Interior Breeding Bird species. Many of these species are dwindling because of destruction of habitat. Exactly what is being proposed by Shugart Solar.

One misrepresentation of the project, that is repeatedly used, is the description of clearcutting and partial bulldozing of this natural area as "gentle." It definitely conflicts with the Merriam-Webster definition of gentle meaning - soft, delicate. Chainsaws, bulldozers, and earthmovers are not gentle.

One of many non-fact based statement occurs on page 3 when they state "there is no stretch required to provide very low impacts as well as high social and economic benefits. This report can be reasonably interpreted as stretched beyond proofs.

Page 4 only highlights the impact to the land. It is misleading to not mention the impact to the waterways. That is the subject of the permit they are seeking from your division in MDE

At several times in this report the value of Ecosystem Services is referred to when it can be used to mislead the impacts of the project. It is in direct conflict with their claim that that statistics have no legal bearing on the permitting process in Maryland. This is a permitting process!

On page 8 the report states that the proposed facility results in increases to frequency discharge levels. Just past that they admit that the Wards Run appears to have limited assimilative capacity remaining. On a practical and historic level any disturbance to the Wards Run watershed cannot be sanctioned by this very organization that is missioned with protecting our waterways. Again on page 10 it states the affected streams have NO additional assimilative capacity. Conflicting with this in the same sentence, the report states that Shugart Solar will have an effect on these streams.

Page 11's claim is a significant economic and fiscal impact during construction. These are one time during construction only. On that page it is very misleading to say that in their analysis much of the local economic benefits rely on a claim that they will be using qualified local firms. Local defined as in the State of Maryland. Are these firms located in Maryland? Without this claim being substantiate economic benefits are just speculation that does not warrant the needed MDE permit being granted? The numbers in Exhibit1 have to be proven in more ways than just filling in the blanks.

Page 13 and 14 have these confusing statements regarding ongoing maintenance expenditure impacts. On 13 its states "there will be relatively modest need for maintenance and other care for the facility." Then on 14 its explodes this modest need into \$1205 per day expenditures and a positive \$2493 per day economic impact for the ongoing maintenance. On page 22 the report also claims there will be \$1791 daily in business sales. All conflicting and misleading.

Exhibit 7, has the carbon offset impacts. These figures do paint the need for less polluting sources of energy. But along with listing hydroelectric there has to be a the consideration of the still ongoing millions and millions of dollars and the serious ecosystem damage these projects have done because of lack of research on the negative effects of where and how they were constructed.

Page 23 there is the acknowledgement that climate change will affect everyone. But it states that this information should not be considered in this report. These statements by Shugart Solar should be ample evidence that this permit is being requested under outdated statistics. New research is needed that foresees this climate change the company expects to continue to happen.

Page 25 the report tells of pressure from voters to reduce carbon footprint and climate change. They conveniently leave out the large amount of pressure from local residents to protect the large tracts of forest remaining in Charles County.

On page 32 the report states that a study of contributions to wildlife habitat and biodiversity is not needed for the permit they are seeking from MDE. With no study done they do issue the conflicting statement that Shugart Solar will clearly contribute material value to habitat and biodiversity. Impact of deforestation is totally ignored. Just more evidence of covering up what is relevant to issuing this permit.

On page 38 in a grasp at anything to mislead MDE they even make an attempt to predict that a share of the money coming into the area will be spent on birthday presents. This concretizes how vague and unrealistic this justification statement is.

Page 37's summary is that Shugart Solar will have very low impact and very high value of real and social benefits easily justifying its construction conflicts with the many credible written and verbal public comments submitted in opposition of this project being built at this site.

The best social advantage of this report would be to make sure it is recycled in full.

Bob Lukinic, Conservation Chair

Southern Maryland Audubon Society