



27 February 2019

To:

Mr. Benjamin Kuo
Vice President for Planning and Facilities Management
Georgetown University

Mr. Xavier Rivera
Director, Department of Energy and Utilities
Georgetown University

Cc:

Secretary Ben Grumbles
Maryland Department of the Environment
Ben.Grumbles@maryland.gov

Mr. Jeff Thompson
Chief, Nontidal Wetlands and Waterways Central Region Section
Maryland Department of the Environment
Jeffrey.Thompson@maryland.gov

RE: MD Solar 1 (Shugart ValleyPlace) – AI # 162822, permit tracking # 201861760

Dear Mr. Kuo and Rivera,

The Audubon Society of the District of Columbia (a.k.a. DC Audubon Society / DCAS) has become aware of Georgetown University's plans for a large solar project in Charles County, MD, and we are writing to express our opposition to the site chosen. While we support and commend the university's efforts to use clean energy, the proposed location of the solar project is extremely concerning due to the amount of forest that will be removed and the potential negative impacts on the site's Tier 2 streams and their water quality.

Maryland's Department of Natural Resources (MD-DNR) has designated this area as a Greenprint which identifies the highest-quality ecological habitat. It is also designated by MD-DNR as a Targeted Ecological Area (TEA). TEAs are lands and watersheds of high ecological value that have been identified as conservation priorities by MD-DNR for natural resource protection. These areas represent the most ecologically valuable areas in the State, the best of the best.

Additionally, this parcel is located in the National Audubon Society-designated Nanjemoy Important Bird Area (IBA). The solar project would increase the fragmentation of Nanjemoy IBA's ecologically valuable forests and contribute to the ongoing fragmentation that is already a serious problem in Southern Maryland and the Potomac River Basin. Many bird species, including DC's state bird the wood thrush, require larger contiguous forests like Nanjemoy IBA. More information about IBAs and Nanjemoy specifically can be found [here](#) and [here](#).

We join the many citizens and conservation groups that are concerned about the project and hope that Georgetown will choose another site that is better suited to its admirable sustainability objectives but

doesn't compromise an important ecological site or have environmental impacts at odds with its overall goal. Barring that, we ask that Georgetown University hold a public hearing on this matter in DC so that local stakeholders may have an opportunity to voice their concerns.

The DC Audubon Society is an official chapter of the National Audubon Society. An all-volunteer, non-profit organization with nearly 1,300 members, we work to promote the appreciation and conservation of birds and their habitats in the DC area. We feel strongly that the Nanjemoy Important Bird Area is an important regional resource that should be preserved for generations to come.

Thank you for your attention to this important matter.

Sincerely,

Chris Murray
President
DC Audubon Society