



Comments of the Advocates for Herring Bay¹
Regarding MD Solar 1 LLC, Shugart Valley, Charles County
Maryland Department of the Environment Application 18-NT-0323/201861760
June 3, 2019

Recommending that a permit not be granted for this project as it would harm ecologically important resources, including priority streams and forests

The applicant in this case is proposing to cut down about 240 acres in a large, contiguous forest to build a large-scale solar facility near Pisgah in Charles County. This forest is one of Maryland's targeted ecological areas that have been designated as a conservation priority for the state. It is home to many at-risk birds as well as Tier II streams, the designation given to Maryland's highest quality streams.

While the Advocates for Herring Bay applaud Georgetown University for its commitment to purchase solar energy, we oppose using forested and other environmentally sensitive lands for such projects. Approving this permit would set a dangerous precedent that could adversely affect the progress we have made in Anne Arundel County, which enacted zoning policies in 2018 that preclude siting solar arrays in "environmentally sensitive areas or habitats for Forest Interior Dwelling Species."²

Approving this permit also would impede progress on other state and county goals. In addition to disrupting the natural habitat of already threatened wildlife, losing 240 acres of trees will reduce the amount of carbon sequestered, thereby making it harder for Maryland to meet its commitment to limit emissions of climate-warming pollutants. The project may also result in additional pollutant releases into the Chesapeake Bay watershed—threatening the clean-up achieved to date—because of the loss of forests that absorb and recycle silt and other contaminants.

We urge the Maryland Department of Environment to **deny** the permit application submitted by MD Solar 1, LLC for a project at this particular site. We also hope that the State of Maryland will adopt policies that will encourage entities like Georgetown University to acquire renewable energy from facilities installed on surfaces that have little or no carbon-sequestration potential, like large commercial rooftops or abandoned landfills.³

Thank you for your consideration of our comments. If you have any questions about our statement, please contact Jette Findsen at herringbay@gmail.com.

¹ The Advocates for Herring Bay (AHB) is a community-based environmental group located in southern Anne Arundel County. Information about our organization can be found on our website www.herringbay.org

² See Anne Arundel County Bill 89-18, which added Article 18-11-156(2). To read AHB's comments on that bill, see [AHB-Anne Arundel Solar Zoning Testimony](#)

³ For more information on AHB's recommendations regarding siting incentives, see [AHB-Clean Energy Jobs Act](#)