



Sierra Club believes that substantial expansion of solar power is absolutely essential to reduce greenhouse gas emissions and combat climate change. Expert analyses of Maryland's renewable energy potential indicate that to achieve a carbon-free energy sector, solar energy generation will need to provide roughly one-third of our total electricity^{1,2}. At present, Maryland gets only about 2% of our electricity from solar.³ To achieve the necessary growth, solar development must be both aggressive and strategic.

Sierra Club supports responsible deployment of solar energy. The Maryland Sierra Club has significant experience with local efforts to address these important issues. We have participated in solar siting deliberations in multiple counties, including Anne Arundel, Baltimore, Frederick, Montgomery, and Prince George's. To support evidence-based decision-making, we have developed presentations on the basic aspects of solar energy and siting as well as a *Solar Zoning and Siting Policy Guide*.

The transition towards clean energy requires leadership at the local, state and national level, as well as leadership from business and educational institutions. We commend Georgetown University for taking proactive steps to secure its energy from clean renewable sources.

However, in accordance with our national "Energy Siting Guidelines", we want to raise several concerns about proposal, as we understand it.

Without addressing these concerns, Sierra Club cannot support this project.

1. Avoiding Damage to Ecologically Valuable Forest

This immense area of Shugart Valley forest in Nanjemoy is located in the largest forest in the Southern Maryland region that is part of the ancestral homelands of the Piscataway people. As the parcel is approximately 540 acres, this project proposes to clear cut almost half of that land. This would result in a catastrophic fragmentation of the tract and the larger forest. Intact and contiguous forest is essential for habitat, stormwater management, and carbon sequestration.

¹ Jacobson, MZ, *et al*, 100% clean and renewable wind, water, and sunlight (WWS) all-sector energy roadmaps for the 50 United States; Energy & Environmental Science, April 2015

² Institute for Energy & Environmental Research, Maryland Renewable Energy Capacity Estimates; October 2017

³ Public Service Commission of Maryland, Renewable Energy Portfolio Standard Report; November 2018



This area is a top preservation priority for the Charles County Comprehensive Plan, which underscores its importance to our region.

Sierra Club is in support of responsible solar deployment. Therefore, we are deeply troubled that MD Solar 1 proposes to clear cut over 200 of Charles County forest interior in Shugart Valley to export solar energy to Georgetown University in order to meet part of its “sustainability” goals. We urge you to take these numerous concerns into consideration. We love solar and enthusiastically want to see Georgetown University, and the state of Maryland lead the way in the necessary transition to renewable energy in a safe, sustainable and strategic way.

2. Impact on Tier 2 Streams

Water quality is of high concern to the Sierra Club. This forest currently has two MDE designated Tier II streams. The top designation for streams in Maryland is Tier I, but there are no more streams of that designation left in Maryland. All streams have been degraded and this stream is of the highest quality that we have left in Maryland. We request that the MDE address the significant threat to the health of the Nanjemoy Forest Watershed given the potential degradation of water quality.

This site is within a DNR Targeted Ecological Area, TEAs are lands and watersheds that have a high ecological value and are identified as priorities for protection. Additionally, the project site is in an Audubon Important Bird Area, which underscores its value for maintaining the local native ecosystem.

According to the DNR estimate, the value of the forest ecosystem services lost would amount to \$586,000 per year, many times more than the estimate project revenue for Charles County. We urge to to address the concern of fiscal irresponsibility of the project.

In order to truly mitigate climate change, it is necessary to not only decrease our greenhouse gas output but also preserve and expand forested land, the most valuable form of carbon sequestration available to us.