



*Protecting and promoting the natural resources, rural economy,
history and beauty of the Virginia Piedmont since 1972*

December 10th, 2021

Tom Wasaff
Planning Department,
Metropolitan Washington Airports Authority
1 Aviation Circle
Ronald Reagan Washington National Airport
Washington, D.C. 20001

**RE: Dulles Airport Western Solar Development Draft Environmental Assessment
Comments**

Dear Mr. Wasaff,

Thank you for the recent public workshop on the draft environmental assessment (EA) for the proposed Western Solar Development project at Dulles Airport. The Piedmont Environmental Council (PEC), Loudoun Wildlife Conservancy (LWC), and Northern Virginia Conservation Trust (NVCT) generally support solar development at this site given its close proximity to heavy energy load uses such as data centers, commercial development, light industrial facilities, residential areas, and most importantly, existing transmission lines. We would like to offer the following comments and recommendations for the Proposed Action and possible alternatives.

Proposed Action

As part of the Proposed Action, Dominion Energy is willing to compensate the Airports Authority with a small-scale parking lot solar PV system to provide power directly to the Airport, the purchase of electric buses and fleet vehicles, and the installation of the associated electric vehicle charging stations. These components will help the Airports Authority achieve its sustainability goals and ought to be included regardless of how the project progresses.

Dominion Energy wishes to develop a 100-megawatt (MW) utility-scale solar project on approximately 833 acres comprising open fields and deciduous and coniferous forests. This area includes 78 acres of wetlands and other environmentally sensitive areas possibly containing diabase soils-based habitat for plants and related insect species.

While PEC, LWC, and NVCT acknowledges and appreciates the proposed efforts to minimize impacts to the areas above, such as the 50-foot buffer between any wetlands, streams, or other surveyed water features and the associated pod arrangement of the panels, we prefer that the majority of the panels be placed within built environments as proposed in Alternative 3.

Alternative 3

Alternative 3 would include utility-scale solar PV arrays over available developed areas and facilities, including on-Airport facility rooftops, parking garage structures, and above airport parking areas. As mentioned in the draft EA, this alternative would allow for a higher density of solar panels over the footprint of available area and provide approximately 80-83% of the energy output for the 100MW project.

These areas should be prioritized first. The remaining 17-20% of the needed energy output should be achieved through greenfield development within the Proposed Action area, subject to the following conditions:

- Avoid impacts to the 130 wetlands onsite
- Avoid the 61.7 acres of permanent impacts to open areas identified as potential habitat for diabase plants and the open areas containing diabase soils
- Avoid habitats that support the northern long-eared bat (*Myotis septentrionalis*) and four Birds of Conservation Concern: the bald eagle (*Haliaeetus leucocephalus*), red-headed woodpecker (*Melanerpes erythrocephalus*), rusty blackbird (*Euphagus carolinus*), and wood thrush (*Hylocichla mustelina*)

Regardless of the amount of greenfield development that is finally approved, stormwater management measures during and after construction should be carefully implemented in addition to the proposed buffers to avoid degrading remaining forest, open lands and surface waters.

If the majority of the panels are developed as proposed in Alternative 3, significant natural resource areas can be avoided. In the draft EA, there was some concern that Alternative 3 would require use of the Economy Parking Green Lot as part of the utility-scale solar PV system and consequently, not be available for a small-scale parking lot solar PV system to provide energy directly to the Airport. If Dominion Energy maximizes the available parking areas and rooftops for the utility-scale solar PV system development, it could free up acreage for onsite renewable energy generation for the Airport. This win-win should be a top goal that's incorporated into the Final EA.

We believe there is a strong and justifiable opportunity to develop a utility-scale solar project on the Dulles Airport site. Combining the Proposed Action and Alternative 3 as listed above allows MWAA to recognize economic benefit from unused areas of Dulles Airport property while retaining acreage for onsite renewable energy and protecting important natural resources.

Please feel free to contact us at your convenience if you have any questions or need additional information.

Best,

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