

**1000 Friends of Maryland • African-American Land Trust
Assateague Coastal Trust • Association of Forest Industries • Clean Water Action
Dorchester Chamber of Commerce • Dorchester Citizens for Planned Growth
Dorchester Citizens for Safe Energy • Eastern Shore Land Conservancy
Environment Maryland • Friends of the Nanticoke River • Harriet Tubman Organization
Harriet Tubman Underground Railroad Byway • Maryland Chapter Sierra Club
Maryland Forests Association • Maryland League of Conservation Voters
Maryland Legislative Sportsmen's Foundation • Maryland Public Interest Research Group
National Wildlife Federation • Partners for Open Space • Patuxent Riverkeeper
Preservation Maryland • Sugarloaf Conservancy • Talbot River Protection Association
The Nature Conservancy-Maryland/DC Chapter • Wicomico Environmental Trust**

June 25, 2009

The Honorable Martin O'Malley, Governor
State of Maryland
100 State Circle
Annapolis, Maryland 21401-1925

Subject: Mid-Atlantic Power Pathway

Dear Governor O'Malley:

The undersigned organizations applaud your support for renewable energy and its role in curbing greenhouse gas emissions. We also commend your impressive record regarding both the preservation of open space and safeguarding sensitive environmental resources. We are concerned that the Mid-Atlantic Power Pathway (MAPP) transmission line project could stifle the development of new renewable energy sources, increase ratepayer costs, inhibit efforts to curb greenhouse gas emissions, and induce growth in areas where tremendous success has been achieved in preserving farms, forestlands, aquatic habitats, and sites critical to our cultural heritage. The MAPP project is being reviewed through a process that somewhat addresses these issues, but not in the thorough, *comprehensive* manner needed to provide both reliable, affordable energy and the conservation of the natural resources which make Maryland such a great place to live. It is for these reasons that we urge you to explore opportunities to institute a truly comprehensive transmission line planning process through administrative order or other mechanisms.

The current review process is that overseen by the Maryland Public Service Commission. While the staff of the Commission and that of other agencies participating in the review are very skilled and dedicated, we believe that even Herculean efforts on their part cannot overcome the limitations inherent in the review process. Specifically, we see three major deficiencies with the

process when contrasted with a comprehensive approach to transmission line planning, such as that called for in your 2007 letter to then U.S. Department of Energy Secretary Samuel Bodman.

Single Solution To A Complex Problem

New transmission lines are but one of a number of options for satisfying our short- and long-term energy needs. Many of these options were identified in the following State planning documents:

- *Interim Report of the Public Service Commission of Maryland to the Maryland General Assembly Part I: Options for Re-Regulation and New Generation;*
- *Maryland Climate Action Plan;* and
- *Maryland Strategic Electricity Plan.*

We are concerned that the current review process does not allow for a thorough evaluation of the short- and long-term pros and cons of a transmission line when compared with all of the other options identified in these planning documents. Instead, the question before the Commission will be whether there is a short-term (15-year) need for the MAPP project; not whether it is the best option for meeting short- and long-term energy needs.

In May, the Commission received another application for an even larger transmission line project: the Potomac-Appalachian Transmission Highline (PATH). Many of the concerns presented in this letter with regard to the MAPP project also apply to the PATH transmission line. Commission staff and that of other State review agencies will be forced to evaluate both major projects within much the same limited time frame discussed later in this letter. We are concerned that this constraint will further impede a thorough, comprehensive review of both projects which can only be done on a statewide and, indeed, region wide basis as noted in the May 4th letter to Congressional leadership from you and nine other Governors.

MAPP has been justified in part by the reduction in cost to Maryland electric customers. Documents submitted to the Commission show a possible savings of \$0.40 to \$0.70 on a typical monthly residential electric bill. However, these same customers (plus those throughout the 13-state PJM area) will pay an additional \$0.36 per month to cover the cost of MAPP. Documents submitted to the Commission for the PATH project show customers throughout PJM will pay \$0.59 per month for that project. We assume the TrAIL transmission line project will add another cost to our monthly electric bills. It is unclear how the Commission can compare the costs and benefits of these multiple transmission line projects through the current process. Added to this is our concern about how the Commission would factor in the costs-benefits of other options for maintaining reliable, low-cost electric service such as improved efficiency, wind projects, etc. It strikes us that these questions can only be fully studied through a comprehensive planning process.

Finally, the process does not truly allow for a full evaluation of the effect of the project on other solutions, which are arguably more desirable, such as shifting our reliance from coal-fired electricity to that generated by renewable sources like wind. Of course you and the Governors of nine other states made much this same point in your May 4, 2009, letter to the U.S. Congressional leadership.

Only One Corridor Studied

The Commission will be required to make a decision regarding the single corridor selected by the utilities who are seeking a Certificate for Public Convenience and Necessity for the MAPP project. While the proposed single corridor may make sense with respect to construction costs and electric transmission efficiency, we assume other corridors are feasible from a cost-efficiency perspective yet would have the less impact on farms, forests, aquatic habitats, lands critical to our cultural heritage, and other factors.

With most major linear projects comprehensive planning begins with the identification of issues and alternatives through a very public scoping process. Multiple corridors, various designs, and other alternatives are identified for fulfilling the project purpose. All of the alternatives are then thoroughly studied to select that which fulfills the project purpose with the fewest negative effects. None of the most critical components of this comprehensive planning approach will occur through the Commission's review since only one alternative (a transmission line) and only one corridor is being considered.

Again, the proposed routing of MAPP is but one of a number of possible corridors. There are many reasons to believe that the single corridor proposed by the applicants is uniquely sensitive with regard to transmission line impacts. For example, the proposed MAPP corridor passes through the portion of Maryland with a number of uniquely important environmental resources, which includes:

- the highest ratio of preserved- to developed-lands in the state;
- forests having the highest carbon sequestration rates, a factor critical to moderating climate change;
- the highest concentration of threatened-endangered species habitat on the Eastern Shore;
- an abundance of aquatic habitats critical to the Blackwater National Wildlife Refuge ecosystem;
- some of the largest tracts of commercial forestlands in the state; and
- some of the most productive agricultural soils.

Furthermore, the proposed corridor requires setting the precedent of bringing a major utility line across the Chesapeake Bay for the first time. On June 9th the Chesapeake Bay Foundation wrote to you regarding the potential impact of this precedent-setting action.

In addition, the proposed MAPP corridor bisects an area unusually rich in cultural resources, which includes:

- a high density of sites associated with the Underground Railroad, Captain John Smith Water Trail, and other lands critical to the interpretation of our cultural heritage;
- pristine viewsheds which retain a high degree of cultural, historical and natural integrity, remaining remarkably free of manmade intrusions for over 300 years; and
- the Blackwater Wildlife Refuge, the proposed Harriet Tubman Underground Railroad National Historical Park, Harriet Tubman Underground Railroad Byway (*nominated for All-American Road/National Scenic Byways designation*), sites on the John Smith Water Trail, African American historic sites and countless small communities whose livelihoods have historically depended upon the husbandry of the natural resources found there.

Efforts to preserve these resources represents an enormous investment and stated commitment to our cultural and historical heritage by the federal government and the State of Maryland via the designation of the new Harriet Tubman Underground Railroad National Historical Park and Harriet Tubman Underground Railroad Byway. These resources offer a unique view of the cultural and historical foundations of our nation and should be recognized as a living part of our community life in order to provide a sense of orientation and place to generations of American people now and in the future. Bisecting this area with an extra-high voltage transmission line will critically and permanently alter the unique character and context, making it impossible to assess the known damage of this intrusion or its impact on the region.

The single corridor proposed for MAPP poses a threat to these and other resources due to:

- the direct impact constructing and maintaining the transmission line right-of-way;
- the potential for inducing first industrial growth then commercial-residential sprawl by making excessive quantities of cheap electricity available; and
- by facilitating increases in greenhouse gas emissions which are projected to cause sea-level rise inundating large expanses of the lower Eastern Shore by the end of this century.

While State agencies have asked about other possible routings, the only corridor receiving extensive study is that proposed by the applicants. The applicants are studying several

alignments within the corridor, but all of the alignments pose much the same threat to the uniquely sensitive resources listed above. So, in effect, the choice will be between the lesser of evils.

It is likely that other west to east transmission lines or utilities will be proposed in the future. Once approved the MAPP right-of-way will become the logical location for these future facilities. While there are substantial advantages to collocating these facilities, this also begs the question as to whether the single corridor under consideration for MAPP is the best choice. The current review process is poorly suited to answering this question. This is but another reason why the State of Maryland should initiate a comprehensive planning process to identify likely future, linear energy projects then evaluate multiple corridors to identify that which accommodates these facilities with the least adverse effect.

Further detail on how MAPP will impact these resources is provided in *Mid-Atlantic Power Pathway & The Need for a Comprehensive Process for Planning Transmission Lines in Maryland*, which was prepared by Dorchester Citizens for Safe Energy and accompanied their April 17, 2009 to you. The document is also posted at: ceds.org/DCSE.

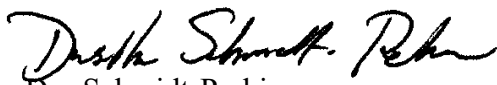
Only One Year of Study

Federal law requires that the Commission render a decision on the need for the MAPP project within one-year of the application date, which was February 25, 2009. If a decision has not been made by February, 2010 then the Federal Energy Regulatory Commission may grant approval.

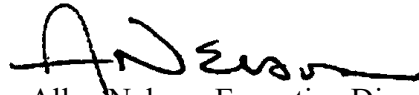
As of this date the various State agencies reviewing MAPP have asked the applicants to answer more than 300 questions regarding the project. Many of these questions have yet to be answered fully. Last February, Dorchester County citizens posed nine fairly simple questions to the applicants. Five months later the citizens are still waiting for answers.

There is no question that the importance of the historic, environmental, scenic and cultural landscapes and their contribution to the interpretation of our heritage in this region is unparalleled. We respectfully request the State of Maryland to consider that before moving forward with this initiative, without exploration of every possible alternative and consideration to what we stand to lose, would be to undermine the value of all our heritage here in Maryland.

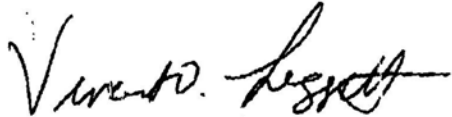
With only eight months remaining before the February, 2010 deadline it is difficult to envision how the Commission can thoroughly and comprehensively evaluate the extremely complex question of need. Clearly, the present approach for planning and reviewing transmission line projects is severely flawed. We assume that this realization was a major factor prompting your 2007 letter to U.S. Energy Secretary Bodman and the May 4th letter to the Congressional leadership. As requested at the beginning of this letter, we urge you to explore opportunities to resolve this critical situation by instituting a truly comprehensive transmission line planning process through administrative order or other mechanisms.



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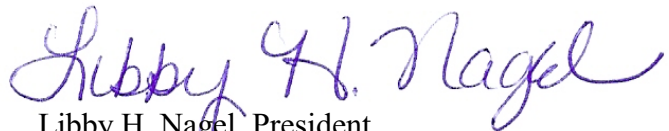
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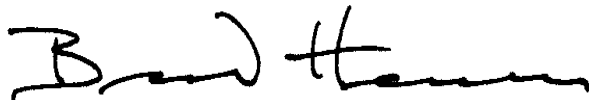
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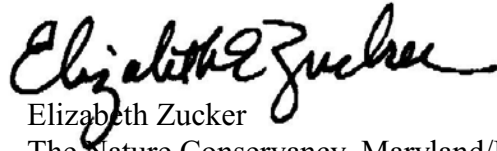
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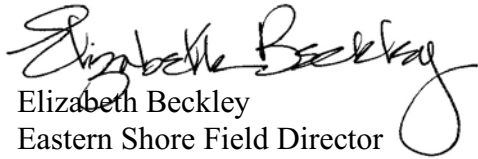
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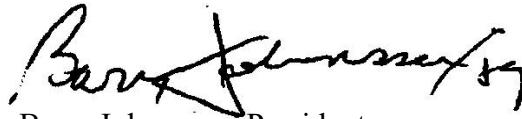
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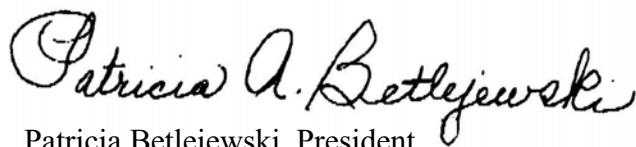
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