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AILEEN BOWDOIN TRAIN

June 9, 2009

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

Subject: Mid-Atlantic Power Pathway

Dear Governor O'Malley:

I am writing regarding the 230-mile extra-high voltage transmission line known as the Mid-Atlantic Power Pathway (MAPP) proposed for construction between Dumfries, Virginia and Egg Harbor Township, New Jersey. We are concerned about the adequacy of information presented on the alternative routes proposed for the pathway and the impacts of those alternatives. In addition, we believe it is important that this project be considered in context with Maryland's future energy and infrastructure needs. We respectfully request the State of Maryland to consider the following suggestions in conjunction with reviews by the Maryland Public Service Commission and other State agencies.

Potential Impacts to Aquatic Communities Must be Comprehensively Evaluated

The proposed transmission line will run beneath the Chesapeake Bay from southern Maryland to Taylor's Island. CBF is concerned about potential impacts to sensitive shallow water habitats in this region, including oyster bars and underwater grass beds. Should the project proceed, we recommend efforts be made to avoid these areas during installation of the line. Furthermore, the impacts of introducing suspended sediments in the water column during trenching should be minimized. Suspended sediments can smother oyster bars and are known to reduce sunlight penetration, which can adversely affect submerged aquatic vegetation.

Since this is a precedent-setting utility crossing, we believe the State must take extra precaution to assess impacts related not only to this project, but also to future proposals to transect the Bay. Our suggestion is that the State orchestrate an independent analysis by scientists and other experts who can evaluate both the individual and collective impacts associated with future proposed crossings. Particular attention should be given to how to manage such crossings without compromising commitments to restoring the Bay's health.

Additional Information on Alternatives and Impacts Needs to be Publicly Available

We could not find specific information on the MAPP web page related to the environmental impacts of certain land-based routes, including the portion proposed on Maryland's Eastern Shore. From the web page, it appears that a management-decision software tool is being used to determine which routes would have the least impacts to both the environment and the "built environment," and which would be preferable from an engineering perspective. Certain maps that are available provide only limited information related to these different proposed options, and no details are shown to support how these scenarios are generated. Quantitative

outputs in terms of acres of impacted wetlands, forests, farmland, etc. also do not appear to be available. We believe it is important for this information to be shared and suggest that the State make it clear to the applicant that such information should be easily accessible to the public.

In addition, under the MAPP proposal, we understand several alternative corridor locations are being considered by the applicants. Yet despite several requests, including at least one from the Maryland Department of Natural Resources, detailed information related to these alternatives has not been forthcoming. We suggest that an analysis of the full range of alternatives be made available.

The MAPP Project Must be Reviewed as Part of a Comprehensive Energy Policy


CBF commends you for calling for a comprehensive approach to serving Maryland's energy needs. We believe the 2008 *Maryland Strategic Energy Plan* and the *Maryland Climate Action Plan* begin to chart a course forward to address issues related to energy generation, transmission, and distribution in a more holistic and inclusive way.

Additionally, your July 6, 2007 letter to U.S. Department of Energy Secretary Bodman outlining concerns about the Department's designation of the Mid-Atlantic Area National Interest Electric Transmission Corridor is also supportive of comprehensive energy planning policy. Similar sentiments were echoed in a recent letter to Congressional leadership in which you and other governors from Northeast and Mid-Atlantic states encouraged state and regional planners to develop a plan within and across regions to accommodate growing availability of offshore wind resources. We agree that any energy corridor designation must be consistent with long range plans.


Given the complexity of issues related to energy supply in Maryland, including costs, infrastructure suitability and location, climate change targets, the role of alternative sources, and other important energy policy concerns, we suggest implementing a comprehensive planning process for energy production and transmission. This process would include an evaluation of the full range of issues necessary to ensure Maryland's long-term energy service is safe, clean, and efficient. We also suggest using the outcomes of the process to guide reviews of the MAPP proposal so that the goal of delivering low-cost, dependable energy does not compromise other priorities of the State.

Thank you for your consideration of these suggestions. I look forward to a continuing dialogue as this project receives further consideration in the coming months.

Sincerely,



Will Baker
President



Kim Coble
Maryland Executive Director


Cc:

William H. Gausman, Senior Vice-President, Pepco Holdings, Inc.
John R. Griffin, Secretary, Maryland Department of Natural Resources
Douglas R.M. Nazarian, Chairman, Maryland Public Service Commission
Jay L. Newcomb, President, Dorchester County Council