April 17, 2009

The Honorable Martin O’Malley
State House
100 State Circle
Annapolis, Maryland 21401

Dear Governor O’Malley:

Dorchester Citizens for Safe Energy is an alliance of more then a thousand property owners who share concerns regarding the potential impact of the Mid-Atlantic Power Pathway (MAPP) project. The alliance also includes a number of other organizations sharing our concerns.

MAPP is proposed as a 230-mile, extra-high voltage transmission line passing through southern Maryland and the lower Eastern Shore. We believe that the MAPP project has impacts which cannot be reasonably addressed through the normal transmission line review process. In fact, we believe that a more appropriate process would be the comprehensive planning approach you called for in your July 6, 2007 letter to then U.S. Department of Energy Secretary Samuel Bodman. The lack of comprehensive planning is demonstrated most clearly by the single corridor proposed for the project. With most linear projects subject to a comprehensive planning process, multiple corridors are evaluated, but not in the case of MAPP. The document accompanying this letter, *Mid-Atlantic Power Pathway & the Need for a Comprehensive Process for Planning Transmission Lines in Maryland*, contains a description of each potential impact and sets forth the reasons why the normal review process is inadequate to address and resolve each adverse effect. A summary of project impacts follow.

The transmission line will be buried beneath the Chesapeake and will disturb a 500-acre area. We believe this disturbance will degrade Bay water quality and damage bottom-dwelling communities. The transmission line will then cross 30 miles through the heart of Dorchester County at a height of 125-feet. Given the very flat nature of our county, the overhead portion of the line will be visible from great distances. The visual impact will detract from the proposed state park, national park, and other facilities honoring some of Dorchester County’s greatest heros - Harriet Tubman and the other brave souls who operated the Underground Railroad. Also at risk are the Captain John Smith facilities proposed for Vienna. Collectively, these facilities commemorate a noble chapter in our blemished yet proud history. The facilities will also bring about at least a doubling in nature- and history-oriented tourism. This is one of the few forms of economic development that increases the wealth of Dorchester County without jeopardizing our extremely sensitive natural- and historic-resources.
The transmission line will be built within a 200-foot right-of-way clear-cut of all trees and shrubs. This project passes through a part of the State which is among the most sensitive with respect to ecological areas. The clear-cut swath threatens the farms and commercial forestlands essential to the County’s economy. These farms and forests are critical to preserving the historical context of the 125-mile Harriet Tubman/Underground Railroad Byway.

We are also concerned about two indirect impacts: induced growth and exacerbating sea-level rise.

The MAPP project will greatly increase the supply of electricity available on the lower Eastern Shore. While some increase would surely be of benefit we are concerned that an excess of electricity may combine with other factors to induce first industrial growth, then commercial and residential development, which otherwise would not occur. This growth could threaten large expanses of farm and forestland preserved at great expense to tax-payers. The induced growth could also alter the character of areas critical to understanding the context of the contributions made by Harriet Tubman and others who operated the Underground Railroad.

Finally, the MAPP project will relieve congestion limiting the amount of electricity that can be conveyed from coal-fired power plants in the Ohio valley to the Mid-Atlantic and New England states. From your leadership in the area of climate change we know you are well aware that coal-fired plants release far greater quantities of greenhouse gases when compared to other generating facilities. By reliving congestion the MAPP project will facilitate increases in greenhouse gas emissions which, in turn, will exacerbate climate changes threatening to inundate half of Dorchester County by the year 2100. The rise in sea-level jeopardizes Blackwater Refuge, the Harriet Tubman/Underground Railroad facilities as well as the Captain John Smith attractions, some of the best farm and commercial forest land in the State, and some of Maryland’s most sensitive ecological areas.

It is for the reasons cited above that we ask you to call upon the Maryland Public Service Commission to withhold a Certificate of Public Convenience and Necessity until the applicant has completed the comprehensive planning process you advocated in your 2007 letter to Secretary Bodman. Of course this process should include identification of all reasonable alternatives, including more then just one corridor, then rank each based upon the planning elements presented in the accompanying document. Finally, we would deeply appreciate it if you would consider holding a town hall meeting in Dorchester County regarding how a truly comprehensive planning process can be instituted for this project.

Sincerely,

Libby H. Nagel, Chair

cc:   Honorable Harry R. Hughes
Honorable Effie M. Elzey, Dorchester County Council
Honorable Jay Newcomb, Dorchester County Council
Honorable William V. Nichols, Dorchester County Council
Honorable Rick Price, Dorchester County Council
Honorable Ricky Travers, Dorchester County Council
Honorable Richard F. Colburn, Maryland Senate
Honorable Rudolph C. Cane, Maryland House of Delegates
Honorable Adelaide C. Eckardt, Maryland House of Delegates
Honorable Jeanne Haddaway, Maryland House of Delegates
Honorable Benjamin Cardin, U.S. Senate
Honorable Barbara Mikulski, U.S. Senate
Honorable Frank Kratovil, U.S. House of Representatives
Honorable Richard Sullivan, Mayor - Town of Brookview
Honorable Victoria Jackson-Stanley - Mayor, City of Cambridge
Honorable Robert L. Herbert, Mayor - Town of Church Creek
Honorable Caroline S. Cline, Mayor - Town of East New Market
Honorable Helen A. McAllister, Mayor - Town of Eldorado
Honorable Deanna Smith, Mayor - Town of Galestown
Honorable Don William Bradley, Mayor - Town of Hurlock
Honorable Susan B. Dukes, Mayor - Town of Secretary
Honorable Russell Brinsfield, Mayor - Town of Vienna
Honorable Roger L. Richardson, Maryland Department of Agriculture
Honorable Shari T. Wilson, Maryland Department of the Environment
Honorable John R. Griffin, Maryland Department of Natural Resources
Honorable Malcolm D. Woolf, Maryland Energy Administration
Honorable Douglas R.M. Nazarian, Maryland Public Service Commission
Mr. Matthew Gallagher, Office of the Governor
Mr. Charles Fox, USEPA Chesapeake Bay Program
Ms. Amanda Fenstermaker, Dorchester County Department of Tourism
Mr. Allen Nelson, Dorchester Chamber of Commerce
Mr. N. Wesley Messick, Dorchester County Soil Conservation District
Mr. Ren Serey, Critical Area Commission for the Chesapeake & Atlantic Coastal Bays
Mr. Dolden Moore, Wetlands Administration - Maryland Board of Public Works
Ms. Suzanne Baird, Manager - Blackwater National Wildlife Refuge
Mr. Dennis Reidenbach, Northeast Regional Director National Park Service
Dr. William Boicourt, University of Maryland Center for Environmental Science
Dr. Walter Boynton, Chesapeake Biological Laboratory
Dr. Jeff Cornwell, Aquaculture and Restoration Ecology Laboratory
Ms. Dru Schmidt-Perkins, 1000 Friends of Maryland
Mr. Vincent O. Leggett, African-American Land Trust
Ms. Kathy Phillips, Assateague Coastal Trust
Mr. Bill Miles, Association of Forest Industries
Ms. Kim Coble, Chesapeake Bay Foundation
Mr. Mike Tidwell, Chesapeake Climate Action Network
Mr. Andrew Galli, Clean Water Action
Mr. Jeff Crane, Congressional Sportsmen’s Foundation
Mr. Fred Pomeroy, Dorchester Citizens for Planned Growth
Mr. Rob Etgen, Eastern Shore Land Conservancy
Mr. Donald Pinder, Harriet Tubman Organization, Inc.
Ms. Diana Y. Thompson, Harriet Tubman Underground Railroad Byway
Mr. David O'Leary, Maryland Chapter Sierra Club
Ms. Paulette Hammond, Maryland Conservation Council
Mr. John W.S. Foster, Maryland Forests Association
Mr. William R. Miles, Maryland Legislative Sportsmen’s Foundation
Ms. Johanna Neumann, Maryland Public Interest Research Group
Mr. Tony Caligiuri, National Wildlife Federation
Ms. Kelly Carneal, Partners for Open Space
Mr. William Gausman, Pepco Holdings, Inc.
Mid-Atlantic Power Pathway &
the Need for a Comprehensive Process for Planning Transmission Lines in Maryland

Prepared By
Community & Environmental Defense Services
811 Crystal Palace Court
Owings Mills, Maryland 21117
410-654-3021
Fax: 410-654-3028
E-mail: info@ceds.org
Web Page: ceds.org

On Behalf Of
Dorchester Citizens for Safe Energy
4762 Ravenwood Road
Vienna, Maryland 21869
410-221-1325
www.dorchesterSAFEenergy.com

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INTRODUCTION
Dorchester Citizens for Safe Energy (DCSE) is an alliance of more than 1,000 property owners who share concerns regarding the potential impact of the Mid-Atlantic Power Pathway (MAPP) project. The alliance also includes a number of other organizations sharing our concerns.

MAPP is proposed as a 230-mile, 500- to 640-kilovolt transmission line passing through southern Maryland and the Eastern Shore1. DCSE believes that the MAPP project has impacts which cannot be reasonably addressed through the normal transmission line review process. In fact, we believe that a more appropriate process would be the comprehensive planning effort Governor O'Malley called for in his July 6, 2007 letter to then U.S. Department of Energy Secretary Samuel Bodman2. A description of the impacts and why the normal review process is inadequate will be provided later in this document.

DCSE respectfully requests that Governor O'Malley consider holding a town hall meeting in Dorchester County regarding how a truly comprehensive planning process can be instituted for this project.

2007 LETTER TO SECRETARY BODMAN
In the 2007 letter to Secretary Bodman, Governor O’Malley set forth a number of concerns regarding the process for planning new transmission lines. We believe the MAPP project embodies many of the concerns presented in the Governor’s letter. We also believe the project is inconsistent with the 2008 Maryland Strategic Electricity Plan3, the Maryland Climate Action Plan4 as well as other State plans and policies.

In the letter Governor O’Malley called upon Secretary Bodman to reconsider the Mid-Atlantic Area National Interest Electric Transmission Corridor (NIETC)5. Of course MAPP is one of the projects proposed for this corridor. Specifically, Governor O’Malley asked the Secretary to:

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1 Further detail on the MAPP project is available at: [http://www.powerpathway.com/](http://www.powerpathway.com/)

2 Governor O’Malley’s 2007 letter can be viewed at: [http://cds.org/DCSE/Governor-DOE7-6-2007.pdf](http://cds.org/DCSE/Governor-DOE7-6-2007.pdf)

3 The 2008 Maryland Strategic Electricity Plan can be viewed online at: [http://energy.maryland.gov/about/reports/documents/MEASTRATEGICELECTRICITYPLAN.pdf](http://energy.maryland.gov/about/reports/documents/MEASTRATEGICELECTRICITYPLAN.pdf)

4 The Maryland Climate Action Plan is available at: [www.mde.maryland.gov/Air/climatechange/index.asp](http://www.mde.maryland.gov/Air/climatechange/index.asp)

5 Further detail on the National Interest Electric Transmission Corridors is available at: [http://nietc.anl.gov](http://nietc.anl.gov)
• implement the prescriptions of the Energy Policy Act by working with local and state governments to study and understand the impact of the NIETC designations on communities, state energy plans, and natural and historic resources;

• provide a much more refined corridor definition. As designated, the Mid-Atlantic Corridor includes all of Maryland with the exception of one county, and such lack of focus in the designation will likely result in protracted litigation. Instead, the designations should focus on potential routes that would aid in establishing transmission lines that benefit the State. Maryland is a net importer of energy and would welcome the opportunity to work with DOE to establish more specific corridors that will more likely reduce the significant congestion charges that some Marylanders face. However, the delineation of corridors should be the product of evaluation in terms of all other potential energy solutions, not just transmission facilities;

and, finally, Governor O’Malley pointed out that:

• Maryland has worked hard and expended millions of dollars to establish one of the nation’s most encompassing programs to preserve lands and resources, including State parks and recreation areas, green spaces, agricultural easements, historical and archaeological resources, and conservation easements. These areas must be afforded appropriate protections from the adverse and permanent impacts of such a widespread corridor designation.

Again, DCSE believes the MAPP project embodies the very narrow view of transmission line planning which Governor O’Malley cited as an unnecessary threat to natural and historic resources. While the proposed alignment may make sense from the perspective of utility managers, a comprehensive planning process could result in options that address legitimate needs to maintain grid reliability without posing such an unnecessary threat to natural and historic resources as well as other equally important factors. The problem, of course, is that the current process for evaluating the MAPP project provides little opportunity for the type of planning Governor O’Malley advocated in his letter to Secretary Bodman. In other words, the various State agencies reviewing this transmission line project are not truly at liberty to examine other options for achieving the legitimate benefits intended by the proponents of MAPP - PJM and Pepco Holdings, Inc. (PHI). In fact, it is DCSE’s understanding that no State agency is even in a position to consider other possible corridors other than that proposed by Pepco.

**DCSE SEEKS AN EQUITABLE, COMPREHENSIVE PLANNING PROCESS**
Whenever a new transmission line is proposed there will be folks who object to the project, like the 1,000 Dorchester residents DCSE represents and the other groups supporting our position. We certainly are not very happy about having an extra-high voltage transmission line running 125 feet overhead for 30 miles across our County. Yet if it were proven that MAPP was critical to maintaining the reliability of electric service in our region and that a truly comprehensive
planning process showed that the best solution was to run a transmission line across our County, then we could accept the project more easily.

In fact, we asked Pepco to provide this information\(^6\). But the problem is that Pepco can only provide the utility managers part of the answer. And, again, the review conducted by State agencies will fail to consider all of the elements cited in Governor O’Malley’s letter as critical to a comprehensive planning process. The remainder of this document sets forth the potential impacts of the MAPP project and the elements which should be included in the type of comprehensive planning process we believe Governor O’Malley urged in his letter to Secretary Bodman.

**POTENTIAL IMPACTS**

While MAPP has the potential to offer a number of benefits to Maryland residents, the project also poses three categories of possible negative effects: direct impacts, induced growth, and facilitating increased greenhouse gas emissions.

**Direct Impacts**

The project will directly impact the Chesapeake Bay and a 200-foot swath across 30 miles of Dorchester County.

**Chesapeake Bay:** At least six high-voltage, direct current (HVDC) cables would be buried beneath 10- to 12-miles of the Chesapeake Bay. These would be the first transmission cables to cross the entire width of the Bay and could set a precedent opening the door to other utility crossings. We have met with several Bay scientists who agree that there is valid cause for concern about negative impacts to the estuary. These scientists also agree that the State should convene a symposium of leading Bay experts to thoroughly evaluate the potential impact of the MAPP project plus other utilities likely to cross the Chesapeake. This symposium would set the stage for determining if the crossings can occur without undue impact to the Bay and, if so, how and where the crossings should occur.

**Overhead Transmission Line:** The transmission cables would be mounted on towers at least 125-feet tall. The transmission line would be constructed within a 200-foot right-of-way clear-cut of all trees and shrubs. The transmission line passes through one of the most sensitive areas in Maryland with respect to environmental and historic resources. The line threatens these resources due to visual impacts, loss of wetlands, fragmentation of forests, damage to cultural features, increased herbicide use, and facilitating the spread of invasive species. Additionally the line will impact a number of farms and some of the most important commercial forests in the state.

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\(^6\) Our request for information was contained in February 9th letter. As of this date Pepco has not provided answers to the questions posed in this letter. The letter can be viewed at: [http://ceds.org/DCSE/Questions-Alternatives.pdf](http://ceds.org/DCSE/Questions-Alternatives.pdf)
Only One Corridor Proposed: With most linear projects, such as highways, several corridors are proposed for evaluation. Only one corridor has been put forth for MAPP. Again, this one corridor passes through what is arguably one of the most sensitive areas in Maryland with respect to environmental and historic resources. We assume that the comprehensive transmission line planning process advocated in Governor O’Malley’s letter to Secretary Bodman would have identified a number of candidate corridors then selected that which would provide maximum benefits with a minimum of negative effects. Again, we would have a far easier time accepting the passage of MAPP through our area if a comprehensive planning process concluded this was the best alignment.

Induced Growth
Three HVDC circuits are proposed to cross the Bay. One would run to the Indian River power plant in Delaware then convey electricity to New Jersey and the New York area. A second circuit would deliver 1000 megawatts (MW) of electricity to a substation at Vienna, MD\(^7\). It is unclear what area the third circuit would serve and when it would be activated. It is the circuit to Vienna which has us concerned.

The 1000 MW of electricity delivered to Vienna would be sufficient to meet the needs of 500,000- to 1,000,000-homes\(^8\). With respect to industrial potential, the 1000 MW could run 22 auto assembly plants, each employing about 5,000 workers. To put these numbers in perspective, BRAC (Base Closure and Realignment Commission) would add 25,000 homes and create 45,000 jobs in Maryland. Also, there are presently 175,000 homes on the Eastern Shore and 815,000 homes throughout the Delmarva peninsula.

The lower Eastern Shore, and Dorchester County in particular, has an abundance of uniquely sensitive and important environmental and historic resources. Since the 1930's local, state, and federal agencies as well as private organizations have worked to preserve these resources. Preservation mechanisms have included buying large areas of land for wildlife refuges and parks, purchase of development rights, and zoning these lands for very low-density, low-impact growth.

The proposal to make 1000 MW available via the Vienna substation appears to be far in excess of the projected electricity needs of the area. We have asked Pepco to provide details on what this electricity would serve but have not received a response. We are concerned that the tremendous excess of electricity could induce industrial growth, followed by commercial and residential development, which otherwise would not occur.

While most DCSE members would not mind seeing some industrial growth, we are concerned that an oversupply may jeopardize the rural character which makes the area

\(^7\) See the Needs Determination submitted to the Maryland Public Service Commission which can be viewed on the PSC website under Maillog 115300: http://webapp.psc.state.md.us/Intranet/home.cfm

\(^8\) See the following MAPP webpage which states that the project (in total) will provide sufficient electricity for 800,000 to 2 million homes: http://www.powerpathway.com/overview.html
such a great place to live. It could also threaten a very promising nature- and history-oriented tourism industry.

We have spoken with a number of experts within Maryland and around the country regarding the potential for inducing growth due to an oversupply of electricity. Most agree that the oversupply alone is unlikely to cause much of a difference. An increase in growth would be more likely if the project reduced electricity cost. However, it appears that an excess of electricity is one of the factors which might stimulate increased industrial growth. In fact, the Department of Business and Economic Development cited the availability of electricity as a factor determining high tech business growth around the three military bases in Maryland affected by BRAC.9

We are concerned that a large surplus of electricity in the Vienna area could lead to proposals to site new industrial or manufacturing facilities on the lower Eastern Shore. These proposals could result in tremendous pressure on local and state government to upzone large areas and lift other development restrictions. If these proposals are made during a time of rising unemployment, such as now, both local and state officials may find it extremely difficult to resist demands to relax growth controls.

It is for this reason that we believe the comprehensive transmission line planning process advocated in Governor O'Malley's 2007 letter to Energy Secretary Bodman should be applied to the MAPP project. Ideally, the process would determine how electricity could be supplied to the lower Eastern Shore to accommodate a reasonable amount of growth while precluding the potential for a future development boom.

Greenhouse Gas Emissions
Last January Governor O'Malley10 said...

"For our prosperity, for our current and future generations, and for the health of our State, which is so vulnerable to rising sea levels, we must take action on climate change now – not later. Maryland can't afford to be left behind. We must commit to taking the actions necessary to protect our environment, our economy, and our citizens."

Climate change triggered by the release of carbon dioxide, methane, and other greenhouse gases is the driving force in global warming and consequent sea level rise. Maryland is the third most vulnerable state in the country to sea level rise according to the Maryland Climate Action

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Plan\textsuperscript{11} and Dorchester is most at risk with more than half of the county projected to be under water by the year 2100.

Rising sea-levels, in combination with land subsidence due to geologic factors, has already caused substantial impact to Blackwater National Wildlife Refuge. It also threatens many other environmentally sensitive habitats spread throughout Dorchester County. In addition a good portion of the proposed Harriet Tubman/Underground Railroad state and national parks will eventually be inundated.

A substantial portion of the electricity carried by the MAPP transmission line will originate at coal-fired power plants in the Ohio valley. These plants release substantially greater quantities of greenhouse gases when compared to other generating facilities.

Congestion in Maryland and Pennsylvania presently limits the amount of electricity which can travel from these plants to the Mid-Atlantic and New England states.\textsuperscript{12} By reducing this congestion the MAPP transmission line could increase energy output from coal-fired plants. Of course more production from coal-fired plants means greater greenhouse gas emissions. It would be cruel irony if the MAPP transmission line degraded quality of life on the lower Eastern Shore through direct impacts and induced growth then exacerbated these damages through accelerated sea-level rise.

It is our understanding that the modeling used to demonstrate a need for the MAPP project ignored new generating facilities and future reductions in energy consumption. If this is correct then a number of important opportunities to reduce greenhouse gas emissions have also been ignored.

There are several new generating projects proposed for Maryland. Most of these facilities would release substantially less greenhouse gases when compared to the coal-fired plants facilitated by MAPP. For example, a 20- to 30-MW biomass facility is being studied for Vienna.\textsuperscript{13} Several research papers indicate that electricity generated from biomass results in 75\% less greenhouse gas emissions when compared to fossil fuel plants.\textsuperscript{14} On March 19th, DCSE members attended a conference in West Virginia on transmission lines sponsored by the Sierra Club. We learned that, in general, new transmission lines tend to stifle the construction of new generating facilities. If this is correct then the MAPP transmission line could jeopardize the

\textsuperscript{11} The Maryland Climate Action Plan is available at: \url{www.mde.maryland.gov/Air/climatechange/index.asp}

\textsuperscript{12} See the Union of Concerned Scientists report Importing Pollution, which is available online at: http://www.ucsusa.org/assets/documents/clean_energy/importing-pollution_report.pdf

\textsuperscript{13} Personal communication with Russell Brinsfield, Mayor of the Town of Vienna, MD.

following goal presented in Governor O’Malley’s February 6th speech at the Good Jobs, Green Jobs National Conference:\(^{15}\):

> In Maryland we have set a goal of creating at least 100,000 green jobs by 2015, and we are working across our State government – along with partners in organized labor, and in the private, academic, and non-profit sectors – to implement twenty action items which are designed to create new jobs, advance eco-friendly technologies, and provide more Marylanders with the skills they need to participate and maximize the benefits for their own families, of a green economy.

The *Maryland Climate Action Plan*\(^{16}\) contains seven mitigation policies that would reduce electricity consumption in residential, commercial, and industrial sectors. Specifically, the EmPOWER Maryland plan contains the goal of achieving a 15% reduction in per capita electricity consumption by the year 2025.

We assume that given Governor O’Malley’s leadership in reducing greenhouse gas emissions a comprehensive approach to planning transmission lines would not ignore new low-emission generating facilities and the effects of initiatives to improve energy efficiency. We also assume that a comprehensive planning approach would examine options for fulfilling whatever legitimate needs MAPP would serve without increasing energy production at generating facilities which emit unusually large quantities of greenhouse gases.

**COMPREHENSIVE PLANNING ELEMENTS**

Again, the MAPP project has the potential to provide many benefits to Dorchester County and the Eastern Shore. However, the potential for extensive and long-lasting harm also exists.

The benefits of MAPP may include more reliable electric service and lower prices along with new opportunities for future growth. But the downside could begin with direct impacts to 800-acres of what is arguably some of the most sensitive lands in the State with respect to environmental and historic resources. The most severe indirect impacts would result from the massive influx of electricity which could then create conditions leading to large increases in first industrial, then commercial and residential growth. This induced growth could bring about widespread changes in future land use in an area where large sums of local, state, federal, and private preservation dollars have been invested.

Both the direct and indirect planning elements are presented below. Many of these same elements were identified in Governor O’Malley’s letter to Secretary Bodman. At a minimum we ask that the Governor seek ways to ensure that the Maryland Public Service Commission applies

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\(^{16}\) The *Maryland Climate Action Plan* is available at: [www.mde.maryland.gov/Air/climatechange/index.asp](http://www.mde.maryland.gov/Air/climatechange/index.asp)
a comprehensive planning approach to the project prior to issuing a Certificate of Public Convenience and Necessity.

**Only One Corridor Considered**
Only one corridor is being studied for the proposed transmission line. Within Dorchester County this corridor measures nine miles north to south by 30 miles west to east. While this corridor may make sense from the perspective of the utilities who proposed it, we question whether it is the best choice with respect to preserving historic resources, sensitive environmental features, and the many other equally important elements cited in this letter. We also question whether the utility managers who selected the corridor have the expertise and motivation to balance these many elements and identify an alignment with the fewest adverse effects.

When we have asked State officials why other possible corridors are not being considered the response was little more then implying that we were attempting to push the project onto others. This is not the case.

As stated previously in this letter, if we were allowed full participation in a comprehensive transmission line planning process, like that advocated in Governor O’Malley’s letter to Secretary Bodman, and this process showed that running the line through Dorchester County was the best option with respect to the elements presented in this letter, then we would find it easier to accept.

**Modeling Supporting Need Should Be Thoroughly Reviewed**
The modeling used to assess the need to improve transmission grid reliability and examine options for resolving reliability issues is complex. It is our understanding that a thorough, detailed review of the modeling is expensive and may exceed the capabilities of the State agencies reviewing the project.

We have spoken with several professionals who have the expertise to carry out this review. Their estimated fee to complete the verification is very high. While we have no doubt that we could raise the tens-of-thousands of dollars this would require, we are mystified as to why this burden should be placed on citizens. It seems to us that this verification would be part of the comprehensive transmission grid planning process described in Governor O’Malley’s letter to Secretary Bodman.

**Future Right-Of-Way Additions & Expansions**
We are concerned that once the transmission line is built other utilities will be added within or adjacent to the 200-foot right-of-way. In fact, much of the western shore portion of the MAPP project is being installed in an existing transmission line right-of-way. However, that right-of-way is 550-feet wide and can accommodate the additional lines. This is less likely with the 200-foot corridor proposed to cross 30 miles of Dorchester County.
Last year the General Accounting Office released a report entitled *Transmission Lines: Issues Associated with High-Voltage Direct-Current Transmission Lines along Transportation Rights of Way*. The following statement appeared in this report:

*Currently, federal statutes as well as federal and state guidance encourage the collocation of new transmission lines along existing transportation and other rights of way.*

We fully support locating new transmission lines within existing rights-of-way. In fact, a good portion of the MAPP project is designed to do just that, with the exception of the 30 miles proposed to bisect Dorchester County. Our concern is that once the 200-foot right-of-way is established other utilities may be added one by one and the 200-foot swathe will expand. We believe that a comprehensive approach to planning this project would assess the potential for future additions and right-of-way expansions then address impacts-alternative alignments in this context.

**Greenhouse Gas Emissions Could Increase With MAPP**

Several months ago the Union of Concerned Scientists released a report entitled *Importing Pollution: Coal’s Threat To Climate Policy in the Northeast*. This report described how a policy adopted by Maryland and nine other states could inadvertently increase the quantity of climate-changing, greenhouse gases pumped into the atmosphere from coal-fired power plants. The policy, known as the *Regional Greenhouse Gas Initiative* or RGGI, committed Maryland and the other nine states to imposing an additional cost on power plants based upon the amount of greenhouse gases released into the atmosphere. The funds generated by RGGI would then be used to increase energy efficiency and renewable energy. RGGI is a critical first step towards halting the climate changes causing the sea-level rise threatening to inundate vast areas of Dorchester County. Unfortunately there is a loophole in RGGI which could undue these benefits and possibly exacerbate greenhouse gas emissions. And the MAPP transmission line would be a critical element in undoing the benefits of RGGI.

RGGI only applies to power plants located within the ten states. It does not apply to plants located outside the region nor to the electricity imported into the ten states from those generating facilities. The greatest quantities of greenhouse gases are emitted from older coal-fired plants. Newer coal plants are slightly better but still release twice the greenhouse gases of gas fired plants. Of course electricity generated by solar and wind releases virtually zero greenhouse gases.

17 The GAO report is available at: [http://www.gao.gov/new.items/d08347r.pdf](http://www.gao.gov/new.items/d08347r.pdf)

18 The Union of Concerned Scientists report *Importing Pollution*, is available online at: [http://www.ucsusa.org/assets/documents/clean_energy/importing-pollution_report.pdf](http://www.ucsusa.org/assets/documents/clean_energy/importing-pollution_report.pdf)

19 Further detail on RGGI can be found at: [http://www.rggi.org/home](http://www.rggi.org/home)
Congestion in the existing transmission grid limits the amount of electricity imported into Maryland and the other Mid-Atlantic/Northeast states participating in RGGI. A large part of the congestion-restricted electricity comes from older, coal-fired plants in Pennsylvania, West Virginia and Midwestern states. These plants are among the dirtiest in the nation with respect to greenhouse gas emissions. The MAPP project along with other proposed transmission lines such as PATH will relieve this congestion and allow more electricity to flow from coal-fired plants into the RGGI states. Since these plants are exempt from the additional fees imposed by RGGI it makes the electricity from these polluting plants cheaper. This cost differential could increase the amount of electricity imported from these dirty plants and, in turn, elevate greenhouse gas emissions.

For Dorchester County residents and many other Marylanders we face the many direct impacts of having an extra-high voltage transmission line marching over 30 miles of our historic and environmentally fragile countryside. This same transmission line may further increase greenhouse gas emissions from coal-fired power plants that, in turn, accelerates the sea-level rise which is already threatening inundation of large areas of the county. This strikes us as the epitome of adding insult to injury.

We assume that greenhouse gas emissions would be a major element of the comprehensive transmission line planning approach advocated in Governor O’Malley’s 2007 letter to Secretary Bodman. We urge the Governor to take steps to ensure that the MAPP project does not proceed until this approach shows that the transmission line will not exacerbate climate change. For example, the Union of Concerned Scientists report contained the following recommendations for Maryland and the other RGGI states:

- RGGI states could insist that those proposing transmission projects to expand the flow of power from states with abundant coal consider the Northeast’s goals for cutting global warming pollution;

- Limit the ability of in-state electricity suppliers to contract for power from more polluting plants, whether inside or outside the region;

- Cap global warming emissions from the entire portfolio of each local electricity supplier; and

- Together or individually, RGGI states could require local electricity suppliers to account for global warming emissions from electricity produced outside the region as well as inside it, offsetting the advantage of imported coal power. States could, for example, require local suppliers to offset any increases in emissions linked to higher imports by expanding their investments in energy efficiency, renewable energy, or another public good.
Effect on Sea Level Rise
The principal climate change threat we Dorchester County residents face is sea level rise. The two- to four-foot increase in sea levels predicted by the year 2100 will inundate half of Dorchester County, including much of the area under consideration for the MAPP transmission line. Figure 1, shows the area of the Delmarva peninsula inundated by the predicted rise in sea level. Added to Figure 1, is a line depicting the MAPP transmission line corridor under study in Dorchester County. Note that the corridor passes through the area which could be inundated by the end of this century. In addition to the effect of sea level rise this portion of our County will also be subjected to more severe storms with increased surges and wave damage.

We do not believe that a comprehensive approach to planning new transmission facilities would place a critical component of the grid in such a vulnerable area. With the minimal increase in sea level we’ve already experienced our local utilities have had difficulty maintaining overhead transmission lines in areas becoming increasingly wet. In fact, a mile of overhead line was recently buried near Pocomoke City because of the difficulty of maintaining the line due to subsidence plus rising sea level. The Choptank Electric Live Wire newsletter (Jan. 2009) contained the following quote regarding maintenance vehicle access along the affected section of overhead line: “You could drive a pick-up from Rt. 113 to the river 20 years ago. That has obviously changed.”

We are also concerned that should the transmission line be built on 125-foot towers the conductors will then be taken down and buried at some point in the future when sea-level rise creates the same maintenance nightmare which prompted burial of the Choptank Electric line. Thus we would suffer the triple impact due to first constructing an overhead line across 30 miles of our County, second burying the same line while, third, leaving the 125-foot towers standing. Again, placing a critical grid component in an area predicted to become increasingly inundated by sea-level rise and subject to increasing storm surges seems far from the result of a comprehensive approach to transmission line planning.

Visual Impact
The towers supporting the proposed overhead transmission line will be 125-feet high. The highest point in Dorchester County is 57 feet above (current) sea level. In fact, only one other Maryland county - Somerset - is lower. Large portions of the proposed transmission line corridor are less than five feet above sea level.

The unusually flat topography means that an overhead transmission line would be visible from greater distances than if located in other portions of the Delmarva peninsula. It is our understanding that when professionals conduct a viewshed analysis they begin three miles from a


21 See the Maryland Geological Survey factsheet Highest and Lowest Elevations in Maryland's Counties at: http://www.mgs.md.gov/esic/fs/fs1.html
Figure 1: Sea-Level Rise Vulnerability
(From the Maryland Climate Action Plan)

Sea-level rise vulnerability in the coastal areas of Maryland, calculated using LIDAR elevation data. Note: LIDAR elevation data were not available for Baltimore City, Harford County, and Prince George’s County. Therefore, vulnerability data do not exist for those areas and cannot be shown on this map.
transmission line corridor, which means the transmission line could be visible from 180 square miles or 30% of Dorchester County.

We assume that a comprehensive transmission line planning process would examine a number of candidate corridors with visual impacts serving as one of the elements used to rank the suitability of each corridor. Again, only one corridor is currently being considered for the MAPP project. As will be seen in the next section of this letter, these visual impacts could threaten historic resources of worldwide significance.

**Harriet Tubman & Other Nationally Significant Cultural Areas**

As Governor O’Malley said in his January 27th announcement regarding the Underground Railroad State Park:

“Harriet Tubman is a true American hero whose dedication and courage will continue to inspire children and their families to stand up for what they believe.”

Of course the portion of Maryland made significant because of Ms. Tubman’s remarkable contributions is more than just the State and the National Park.

Figure 2, on the next page, is a map from the *Harriet Tubman Special Resource Study*.

This map shows that the area of significance with respect to the Underground Railroad extends throughout much of Dorchester County. We added an orange, dashed line bounding the area in which Harriet Tubman/Underground Railroad known sites are located. This area encompasses much of Dorchester County. We also added the red arrow to the map which corresponds to the approximate nine- by thirty-mile corridor under study for the proposed transmission line. Features with cultural significance are located throughout this corridor. In other words, regardless of the final alignment the MAPP transmission line will impact features significant to understanding the contributions of Harriet Tubman and the Underground Railroad.

Following is a quote from the *Harriet Tubman Special Resource Study* released last November by the National Park Service:

*The Choptank region contains extensive and evocative landscapes that have experienced relatively minor changes since the mid 19th century. It is a wet landscape comprised of streams, swamps, and forests mixed with expanses of open water next to large patches of productive agricultural land. The landscapes offer visitors a compelling setting for understanding the narrative of Tubman’s formative years and her break away from enslavement.***

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22 See Governor O’Malley Announces BPW Approval Of Harriet Tubman Design Project at: [http://www.dnr.state.md.us/dnrnews/pressrelease2009/012809c.html](http://www.dnr.state.md.us/dnrnews/pressrelease2009/012809c.html)

23 The *Harriet Tubman Special Resource Study* is available at: [http://www.harriettubmanstudy.org/](http://www.harriettubmanstudy.org/)
This line was added by DCSE and encompasses the regional setting.

How Map Would Slash Through the Heart of the Regional Setting.
In other words, one can drive the 125-mile Byway or stand at numerous points throughout the area and see the swamps, forests, and cropfields of Dorchester County much as they appeared to Harriet Tubman 150 years ago. This unchanged landscape offers visitors a unique opportunity to understand the great difficulties this heroic individual faced as she lead groups of frightened people across a moonlit cropfield or spent the day hiding in an isolated patch of forest or swamp.

You can still see the cropfields and the swamps much as they existed then. Constructing a 125-foot tall transmission line through this area would detract immensely from the sense of stepping back 150 years and seeing the countryside as it appeared to Harriet Tubman and those she led to freedom.

A far greater impact would occur should the 1000 MW of electricity imported to Vienna fueled a substantial increase in industrial, commercial and residential growth in the region. Without thorough planning and additional growth controls, a tremendous amount of pressure could be brought to bear on local and state officials to upzone areas presently slated for preservation. In other words, comprehensive planning is critical to allowing for reasonable growth in the region without sacrificing irreplaceable components of our natural and historic heritage.

In addition to impacts to the Underground Railroad, the transmission line also poses a threat to the John Smith Chesapeake National Historic Trail and the Captain John Smith Nanticoke Discovery Center in the Vienna area.

The Maryland Historic Trust and other agencies reviewing the cultural impacts will be compelled to address the relative impact of the alternative routes proposed by Pepco within the single corridor. All three routes are within the area significant with respect to Harriet Tubman, the Underground Railroad, and Captain John Smith. In other words, the agencies will be faced with a choice among the lesser of evils. We assume that a comprehensive transmission line planning process would identify other possible corridors and not merely focus on a single narrow study area.

**Extensive Land Preservation Investment Jeopardized**

According to the Maryland Department of Planning, 95,273 acres of land in Dorchester County has been preserved. This acreage amounts to a fourth of the entire county. In fact, Dorchester has the highest ratio of preserved to developed land of any Maryland county.

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24 For detail on the John Smith Chesapeake National Historic Trail visit: [http://www.nps.gov/cajo/](http://www.nps.gov/cajo/)

25 For further detail on the Discovery Center visit: [http://www.viennmd.org/commun.html](http://www.viennmd.org/commun.html)

26 Personal communication with Daniel Rosen of the Maryland Department of Planning.
Collectively these preservation efforts represent a tremendous investment of both public and private dollars – an investment that may be more difficult to sustain in future state budgets. The Maryland Agricultural Land Preservation Foundation investment alone totals $11.5 million and safeguarded about an eighth of these lands from development.27

The proposed transmission line would jeopardize this investment through the direct impact of placing 125-foot tall towers across the landscape and the indirect effects of induced growth plus sea-level rise. We believe a comprehensive planning process would allow a broader range of options for protecting this investment when compared to the traditional approach for reviewing transmission line projects. We also believe the extent of preserved lands would be a primary factor used in ranking multiple corridors for the MAPP project. But, again, only one corridor has been proposed.

**Environmental Sensitivity Uniquely High**

Last December Governor O’Malley28 said...

“GreenPrint will revolutionize the way we make our land use decisions by allowing us to work together as One Maryland, using our resources more efficiently and assessing our landscape on parcel, block, neighborhood, watershed and ecosystem levels.”

Figure 3, which follows this page, is the GreenPrint map of Maryland.29 This map combines a number of variables to identify the most ecologically sensitive areas of the State. Note that Figure 3 shows that one of the largest targeted ecological areas centers on Dorchester County and that the single MAPP transmission line corridor passes through the heart of this area.

The 200-foot wide right-of-way of the transmission line poses a direct threat to the wetlands, forests, and other habitats which make this area such a high priority for protection. These habitats support a long list of species considered rare, threatened or endangered. An even greater threat is posed by the indirect impact of induced growth along with sea-level rise accelerated by the increased greenhouse gas emissions facilitated by MAPP.

We believe a comprehensive planning process would not route a major transmission line through such a uniquely sensitive area. At a minimum the process would compare the environmental sensitivity of a number of candidate corridors. But, again, only one corridor has been proposed for the MAPP transmission line.

27 Personal communication with Diane Chasse of the Maryland Agricultural Land Preservation Foundation.


29 For further detail on GreenPrint visit: [http://www.greenprint.maryland.gov/](http://www.greenprint.maryland.gov/)
GreenPrint

Targeted Ecological Areas
Lands and watersheds of high ecological value that have been identified as conservation priorities by the Maryland Department of Natural Resources.

Dorchester County

How many acres have been identified as Targeted Ecological Areas, and how much is protected?

Since 2007, which state conservation programs are protecting the Targeted Ecological Areas?

Protected and Unprotected Targeted Ecological Areas

2007-2009 Land Conservation In and Out of Targeted Ecological Areas

Figure 3
Chesapeake Bay & Tributary Impacts
The applicant has proposed burying the MAPP transmission cables beneath 10- to 12- miles of the Chesapeake Bay. Presently there do not appear to be any cables running beneath the Bay from shore to shore.

Six electric cables would be buried up to nine feet below the Bay floor in trenches measuring 6- to 13-feet in width. The disturbance may affect an area of Bay bottom 400 feet in width by 10- to 12-miles long.

We directed our consultant, Community & Environmental Defense Services (CEDS), to conduct a preliminary review of the scientific literature to determine if there was valid cause for concern about the impact of burying the cables beneath the Bay. We did this for two reasons. First, we wanted to learn if the impact was likely to be significant. Second, if the impact is not significant then we could call for routing the transmission line along the Choptank or Nanticoke Rivers which would eliminate many of the direct impacts cited in this letter.

Next we asked CEDS to forward the preliminary review to leading Bay scientists along with the following questions.

1. Does the scientific literature presented in the review show a valid cause for concern regarding the impact of burying the cables beneath the Chesapeake Bay?

2. If there is cause for concern, then is it possible that the impact would rise to the point that the crossing should not be permitted?

3. If the impact is not likely to be major then what criteria would be appropriate for selecting candidate crossing points?

The Bay scientists agreed there was valid cause for concern though the single cable crossing was not likely to have a major impact. However, they also cautioned that the Bay is suffering from the proverbial death by a thousand cuts. The cumulative impact of the cable crossings plus the many other factors impacting the Bay is a very serious issue. In fact, they pointed out that other similar activities, like open-water disposal of “clean” dredge spoil, has been banned.

The issue which the scientists found most significant was that these would be the first transmission cables to cross the Bay from shore to shore. Navigation charts do show a cable
crossing just north of the Bay Bridges but we are still trying to learn what type of cables are in this area.

The MAPP cables could set a precedent leading to a number of future proposals to extend utilities or other structures across the Bay. The logical location for future crossings would be at an existing crossing. In fact, Pepco Holdings, Inc. and Maryland Broadband Cooperative just announced that a fiber optic cable will also be laid beneath the Bay with the MAPP cables if the project is approved.31

The Bay scientists agreed that the policy implications of these precedent-setting cable crossings are substantial. They also agreed that a first step towards determining if and how these crossings should be allowed would be to gather together their colleagues and other leading experts in something like a symposium. Through this gathering the scientists could brainstorm possible issues and begin the process of identifying options for attaining the legitimate benefits of the crossings but without further hampering the effort to restore the Chesapeake.

For example, proposals to lay transmission cables and other energy infrastructure beneath Long Island Sound prompted the Connecticut Academy of Science and Engineering and the Connecticut Energy Advisory Board to convene a symposium of scientists recognized for their expertise in related fields.32

We believe that a similar gathering of Bay scientists would create the foundation of knowledge needed to understand the impact of MAPP and other possible crossings. One of the Bay scientists suggested that Maryland Sea Grant33 might be the logical entity to convene such a symposium. We view such a symposium as a critical first step in a comprehensive transmission line planning process with respect to continuing the recovery of the Chesapeake Bay. We ask that Governor O’Malley ensure that the Maryland Public Service Commission have the benefit of the knowledge provided through such a symposium before ruling on a Certificate of Public Convenience and Necessity.

Tourism Industry Impacts
There is a long list of outdoor activities which attract tourists and their dollars to Dorchester County: birding, boating, camping, canoeing, crabbing, fishing, hiking, hunting, kayaking, photography, sailing, trapping, and visiting heritage/historic sites. Tourism is likely to increase substantially with the completion of the Harriet Tubman State and National parks along with the Underground Railroad Byway. The John Smith Chesapeake National Historic Trail and the


32 The proceedings of this symposium is available online at: http://www.ctcase.org/reports/LIS.pdf

33 For further detail on Maryland Sea Grant visit: http://www.mdsg.umd.edu/
Captain John Smith Nanticoke Discovery Center in the Vienna area will attract additional tourists.

For example, nearly 200,000 people visited Blackwater National Wildlife Refuge in 2008. Most (75%) of the visitors came from outside the area. The Harriet Tubman Discovery Center is being designed for 50,000 to 75,000 visitors per year, though the total number of visitors could be 75,000 to 100,000 per year. We assume the John Smith Chesapeake National Historic Trail and the Captain John Smith Nanticoke Discovery Center will draw a large number of visitors as well. In fact, CEDS and the Dorchester County Department of Tourism has collaborated on an analysis indicating that existing attractions plus these additional heritage facilities will at least double the number of visitors (310,000 to 418,000/year) and the direct economic benefit to Dorchester County will total $43- to $58-million/year.\textsuperscript{34}

In the Fall/Winter issue of \textit{Shorelines} the Dorchester County Department of Tourism & Heart of Chesapeake Country Heritage Area estimated that the Harriet Tubman/Underground Railroad facilities could attract thousands - perhaps millions - of additional visitors from around the country and the world.\textsuperscript{35} This would be a tremendous boon to the economy of Dorchester County not to mention the honor of hosting such incredibly important facilities.

The 125-foot transmission line would be visible from many of the locations in the County which presently attract tourists. The presence of the line could detract from the rural character of these locations, which is a critical factor in attracting tourists. The impact would be particularly high within the Harriet Tubman/Underground Railroad area, which encompasses much of the county.

As stated earlier, this area remains much as it was in Harriet Tubman’s time. Visitors can see cropfields and forests as they existed 150 years ago, which makes it possible to appreciate the heroism of Harriet Tubman and other conductors in a way not possible if the area takes on a more industrial character due to 125-foot tall transmission towers and increasing development due to induced growth. The visitor from California or Africa can picture the difficulty of leading frightened slaves to freedom by crossing a moonlit cropfield or the terror of hiding in a wooded swamp by day. The transmission line towers and indirect effects would rob the area of this sense of stepping back in time.

The tourism industry supported by these attractions offers a way to grow the economy of Dorchester County which not only compliments but depends upon preserving rural character and sensitive environmental resources. We assume that safeguarding and fostering this form of

\textsuperscript{34} The basis for these numbers is provided in \textit{Potential Economic Benefits of Nature & Historic Tourism for Dorchester County}, which can be viewed online at: http://ceds.org/DCSE/EconomicBenefits.pdf

\textsuperscript{35} The Fall/Winter issue of the \textit{Shorelines} newsletter can be viewed online at: http://www.tourchesapeakecountry.com/downloads/shorelines/Shorelines_FallWint08.pdf
economic development would be a critical element of the comprehensive transmission line planning approach advocated in Governor O’Malley’s letter to Secretary Bodman.

Health Effects
In 2006, the Maryland Power Plant Research Program (PPRP) released a study entitled *Status Report on Investigations of Potential Human Health Effects Associated with Power Frequency Electric and Magnetic Fields (EMF)*[^36]. PPRP concluded that:

> Research on ELF fields has been performed for more than two decades, and the methodology and quality of studies have improved over time. Studies have consistently shown increased risk for childhood leukemia associated with ELF magnetic fields, whereas ELF fields most likely are not a risk factor for breast cancer and cardiovascular disease. There are still inadequate data for other outcomes.

It is our understanding that there is some debate about whether this conclusion applies to both AC and DC lines. Of course, the MAPP transmission line is proposed to carry direct current through Dorchester County. It is also our understanding that PPRP plans to update their study with a detailed analysis of the scientific literature relative to the health effects of direct current. Should this review succeed in quantifying the potential health effects of direct current, then the results should be factored into a comprehensive planning process to determine where and how transmission grid improvements can be made with the least impact to our families.

Property Value Loss
There is a widespread public perception that it is undesirable to live near a power or transmission line. The preceding section of this letter shows that this perception does have some basis in fact. Various studies have shown that this perception results in up to a 20% decline in the value of properties located within 2,000 feet or more of a transmission line.[^37]

As public awareness increases of the implications of sea-level rise in Dorchester County, property value will likely decline. As shown in Figure 1, large areas of the county are at risk of inundation by the year 2100. These areas include the corridor under consideration for the MAPP transmission line. Combined, the impact of sea level rise plus a transmission line could cause the decline in property value to be much higher then elsewhere in Maryland. This issue should be analyzed through the comprehensive transmission line planning process Governor O’Malley urged Secretary Bodman to consider.


[^37]: Links to a number of these studies will be found on the Maryland Citizens for Safe Powerlines website: [http://ceeds.org/mcsp.html](http://ceeds.org/mcsp.html)
Agricultural Impacts
As much as a fourth of the farmland in Dorchester County has been preserved through easements purchased with State tax-dollars or through other mechanisms. The amount of high-quality soils suitable for farming is already a limiting factor for Dorchester County’s agricultural economy. The transmission line poses the following potential threats to all 125,000 acres of farmland in the county:

- If an oversupply of electricity does induce substantial industrial development then vast quantities of farmland could be lost;
- An overhead transmission line could interfere with center-pivot and other forms of irrigation, the aerial application of chemicals to cropfields, and the radio/computer controlled chemical application and irrigation systems;
- The transmission line could cause a loss of farm revenue from hunting leases;
- Construction of a transmission line could bring low productivity soils to the surface of a cropfield;
- An overhead transmission line could devalue nearby property; and
- The 200-foot wide transmission line right-of-way could serve as a conduit for the entry of trespassers and the spread of invasive species onto farms.

Each of these impacts should be quantified then factored into a comprehensive planning process to determine how and where the transmission line could be built to allow agriculture to continue thriving in Dorchester County.

Commercial Forestry Impacts
The forest industry is Maryland’s fifth largest, adding $2.2 billion a year to the State economy and providing more than 14,000 jobs. The forest industry is the second largest employer on the Eastern Shore.

The proposed Mid-Atlantic Power Pathway project would directly impact an estimated 300- to 400-acres of commercial forest. To put that in perspective, 400 acres of mature forest would be worth approximately $480,000 and would be sufficient to supply a large local sawmill for five months. The financial impact of clear-cutting of 400 acres of forest would be immediate and the loss would be permanent.

Equally, or perhaps more seriously, the proposed transmission line appears to fragment significant portions of Dorchester County’s existing forest. Fragmentation has multiple effects. It often creates new parcels of forest which are difficult or costly to access and are no longer economically productive. Such parcels are often sold and go out of forest use altogether. The

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38 See the Maryland Department of Natural Resources webpage Facts About Maryland's Forest Industry at: http://dnr.maryland.gov/dnrnews/infocus/wye_oak_info.html

39 Personal communication with Kirk Rodgers.
process of forest land fragmentation is far advanced in Maryland. Private forest landowners who, by the way, manage 85% of all of the forest land in the state, are now managing smaller and smaller parcels. Recent statistics show that the average size of private timberland holdings is now only 17 acres and continuing to fall.

Forests are, of course, critical to mitigating climate change effects, including the rise in sea-level which poses such a dire threat to Dorchester County. Carbon sequestration provides one measure of the degree to which a forest contributes to curbing climate change. Figure 4, on the next page, consists of a map prepared by the Maryland Department of Natural Resources. This map shows the degree of carbon sequestration provided by forests throughout the State. Note that the forests of Dorchester County have the highest sequestration rates in Maryland and the MAPP corridor passes through the heart of these forests. In addition to the direct impact caused by the 200-foot right-of-way, the growth fueled by making 1000 MW of electricity available via the Vienna substation could dramatically increase forest loss throughout the region.

Forest will be permanently removed within and along the 200-foot transmission line right-of-way, which will also create a large amount of new forest edge. Such edge has clearly been shown to favor invasive species like Phragmites, which enjoys forest edge here in Dorchester County. It competes with and often destroys native plant species in wetlands and has the potential to degrade adjacent forests by denying light to tree seedlings.

Overall, Maryland is losing 6,000 acres of forest each year. Particularly important is the retention of forest land within the Bay's watershed for maintenance of water quality, air quality, wildlife habitat, aesthetics and production of natural wood products. The proposed transmission line appears to be in conflict with the Chesapeake 2000 Agreement and the 2007 Forest Conservation Initiative.

Preserving the many benefits of Dorchester County forests is, of course, supported by a number of State policies. We assume that furthering these policies would be a central element in the comprehensive transmission line planning process set forth in Governor O’Malley’s letter to Secretary Bodman.

CLOSING
In closing, we call upon Governor O’Malley to urge the Maryland Public Service Commission to withhold a Certificate of Public Convenience and Necessity until the applicant has completed the

40 The carbon sequestrationian map and supporting information is available online at: http://dnr.maryland.gov/forests/planning/sfla/indicators/carbon_seq.htm

41 The Chesapeake 2000 Agreement can be viewed online at: http://www.chesapeakebay.net/pubs/chesapeake2000agreement.pdf

Carbon Sequestration

The Indicator

Carbon sequestration — the permanent removal of carbon from the atmosphere — is driven by Net Primary Productivity (NPP) for any given area of land. What humans do with the vegetation has a lot to do with how much is actually sequestered. Rates at which carbon is permanently tied up in vegetation and soils can vary from about 15% to about 50%. For example, most agricultural production is almost immediately recycled through animals and humans, which results in essentially no sequestration.

Sequestration rates have been estimated by both models and field measurements. The modeling and field work examined by Versar, from which this indicator is drawn, yielded very close to the same estimates for Maryland sequestration rates: about 24% of NPP for forests and 50% for wetlands.

Indicator Use

Versar estimated that optimal implementation of a variety of measures to improve sequestration rates—heavily emphasizing protection and management of forests and wetlands for sequestration values and the conversion of underutilized farm land to wetlands and forest—could increase these rates as much as 70% to offset carbon dioxide emissions from power plants and other burning of fossil fuels.
comprehensive planning process advocated in his 2007 letter to Secretary Bodman. Of course this process should include identification of all reasonable alternatives, including more than just one corridor, then rank each based upon the planning elements presented in this letter. Our members look forward to hearing Governor O’Malley’s thoughts on this topic in a Town Hall format.