

## **ESLC Announces Opposition to Mid-Atlantic Power Pathway (MAPP) Project**

On December 1, 2008, Eastern Shore Land Conservancy's Board of Directors voted to take the following position regarding the Mid-Atlantic Power Pathway (MAPP) project:

Due to deep concerns about potential environmental and scenic viewshed impacts to Dorchester County, the Eastern Shore Land Conservancy (ESLC) has announced opposition to the Mid-Atlantic Power Pathway project as currently being proposed by Pepco Holdings, Inc (PHI).

ESLC believes this project should not continue to proceed on a fast track without a comprehensive environmental impact statement (EIS) typically required by the National Environmental Policy Act. Until such time that a full environmental impact study is provided, ESLC must oppose the project.

### **Why ESLC is concerned about the MAPP:**

#### **1. Permanent destruction of the scenic landscape and need for comprehensive environmental review**

ESLC and its conservation partners with the help of local landowners have invested millions of private and public funds to protect the landscape of Dorchester County. ESLC has identified large areas of lower Dorchester County as priorities for conservation because of the landscape's scenic beauty, significant working farms and forests, and ecological importance for the health of the Chesapeake Bay and mitigation of the impacts from climate change. This precious landscape is also rich with cultural resources, including sites relevant to the life of Harriet Tubman and the Underground Railroad, as well as areas important to the Native-American community. The impact on these resources needs to be comprehensively evaluated.

The environmental impacts to sensitive areas resulting from the line crossing the Chesapeake Bay or where the line reaches land on Taylors Island are unclear at this time. PHI admitted that they failed to take into consideration the effects of climate change on the project. As a result, the model has not included the impacts of submerging lands of Dorchester County nor rising sea level as a legitimate concern.

The proposed 500-kilovolt transmission lines will stretch across 27 miles of Dorchester County's scenic landscape, that has remained essentially unaltered for 200 years. PHI has not officially released what the powerlines will look like, nor have they released in detail the height of the proposed lines. However, it is anticipated that the lines will be approximately 150 feet high and 70 feet wide at the base, and require clearing of a 200-foot wide swath of land, which at a 27 mile-length would amount to approximately 650 acres of land in Dorchester County.

Even if the route avoids existing protected lands, alternatives will impact future land conservation opportunities by limiting scenic conservation values on unprotected land.

PHI claims that putting the lines underground is too expensive and not practicable for ongoing maintenance.

PHI needs to conduct a comprehensive environmental assessment that would normally be required under the National Environmental Policy Act (NEPA) that includes a full consideration of alternatives and comprehensive analysis of impacts to the scenic viewshed, working farms and forests, cultural and historic resources, ecologically significant lands, and anticipated impacts of climate change.

## **2. Impact on working farms and forests and the local economy**

In order to install new overhead transmission lines, PHI will inevitably need to clear agricultural and forested land. Working farms and forests are critical to the economy of the Eastern Shore and we cannot afford to lose anymore productive farms or forests. PHI has not provided data as to the specific impacts to working farms and forests aside from the possibility of impacting up to 400 acres of forestland. In meetings with ESLC, PHI has stated that they do not anticipate that this project will bring jobs to Dorchester County, nor do they anticipate that they will utilize local contractors to perform the work. Why doesn't PHI incorporate opportunities for new "green" energy jobs that would benefit the local community?

PHI has not provided information about how the proposed project will impact local economic development plans, which rely heavily on eco-tourism, visitors to the Blackwater National Wildlife Refuge, as well as the Harriet Tubman Underground Railroad Byway. These attractions would be significantly impacted by this project.

In addition, PHI has been unable to articulate specific benefits to Dorchester County with the exception of the potential for \$4 million in additional tax revenue and the potential for more reliable energy transmission, although there is no evidence that current energy transmission is unreliable.

## **3. Unclear need for the utility corridor**

PHI states that the need for the MAPP project is based on anticipated increased demand for electricity in the northeast (primarily New Jersey and New York). PHI's conclusion relies on an electricity congestion study and model that has not been independently verified, and does not take into consideration recent energy policy changes in the state of Maryland or recent changes in nationwide trends regarding consumer energy demand. Mandates for electricity supply generation and alternative sources impact the congestion model for transmission. The model also does not take into consideration the potential for increased alternative energy independence on the Eastern Shore. A great deal of criticism within the land trust community focuses on the need for further analysis and exploration of alternative solutions before locally-implemented projects begin construction.<sup>3</sup>

## **4. Lack of opportunity for meaningful public engagement and dialogue**

There has been a distinct lack of opportunities for inclusive, meaningful public engagement and dialogue about possible alternatives and the impacts of the project. While PHI has spent considerable time and effort meeting with local organizations and holding meetings whereby citizens can ask questions about the project, PHI has purposefully limited opportunity for open discussion about the project. As a result, there is a high level of frustration and concern among Dorchester County citizens that their voices are not being heard. PHI in cooperation with the Public Service Commission needs to provide well-publicized opportunities for local citizens to voice their opinions and express their concerns in a transparent, open forum.

## **5. Eminent domain**

In the event that the MAPP is not approved by the Maryland Public Service Commission, PHI would be able use the power of eminent domain under Federal authority. Section 1221 of the Energy Policy Act of 2005 provides authority for the Federal Energy Regulatory Commission (FERC) to review and override state siting decisions as well as other federal and state laws and policy and confer federal eminent domain to private companies for transmission line siting.<sup>4</sup> The ability to override a decision by the Maryland Public Service Commission, as well as other state and local zoning ordinances, conflicts with policies concerning conservation, agriculture, transportation, and other land use decisions.

### **Voice your opinion today by writing or calling:**

Douglas R. M. Nazarian, Chairman, Public Service Commission

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Send Governor Martin O'Malley a message online:

<http://www.gov.state.md.us/mail/>

*Or write him a letter:*

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SAMPLE LETTER:

Date

Legislator Name

Address

Dear (Delegate, Representative, Senator, Governor, Member of PSC):

I am (We are) writing to express my (our) deep concern for the potential environmental, scenic, and economic impacts of the proposed Mid-Atlantic Power Pathway (MAPP) project in Dorchester County. Although a series of informational public meetings in Dorchester County has been arranged by Pepco Holdings (PHI), I (we) would like to request action on your part in order to require more time for meaningful public input, discussion and consideration of alternatives.

Is a 200-ft. wide, overhead, high-voltage transmission line through Dorchester County the only way to ensure a reliable electricity supply for the mid-Atlantic region and Northeast corridor? I (We) suggest that PHI spend considerably more time exploring and presenting alternatives to the public – not just a few corridors to select from, but alternative solutions altogether. My (Our) concerns about this proposed project include:

- Lack of comprehensive environmental review or impact statement on the project development itself;
- Potential impacts on the scenic viewshed of Dorchester County. Our county has spent considerable resources on developing tourism as an economic strength. Conservation organizations, willing landowners and the State of Maryland have spent millions of dollars of public and private funds to protect thousands of acres of scenic, productive and ecologically-sensitive lands;
- Potential impacts on natural resource-based industries, such as local farming, working forests, fisheries and eco-tourism, as well as important historic and cultural resources;
- Potential effects on the health of people in or near the power lines' path;
- Insufficient evidence that increased high-voltage transmission capacity is the only solution, compared to localized generation and energy conservation, including opportunities for new "green" energy jobs that would benefit Dorchester County;
- Insufficient consideration and discussion of placing these transmission lines underground wherever feasible;
- Lack of consideration of the long-term impacts of climate change on the proposed structures and their locations across Dorchester County, including sea level rise, erosion, coastal land loss and subsidence;
- The ability of the federal government (FERC) to override state decisions through the designation of the mid-Atlantic states as a National Interest Electricity Transmission Corridor (NIETC); and

- Lack of meaningful public discussion about the ultimate outcome of the proposed project.

Please work with the Maryland Public Service Commission to ensure that residents of Maryland, especially Dorchester County, have meaningful opportunities to provide input to the PSC besides choosing one pathway route over another. I (we) believe that a local forum with PSC members (not hosted by PHI) would be one way to accomplish this.

Thank you for all of your work for the residents of (Dorchester County, State of Maryland).

Sincerely,

[your name here]

### **Resources**

Contact ESLC if you have concerns about a specific property or if you would like more information on preserving your land with a conservation easement.

We will post information about future public information meetings and public hearings as that information becomes available. Please stay tuned for future updates from ESLC.

PHI has set up its own website for information about the project at <http://www.powerpathway.com>.

Land Trust Alliance:  
<http://www.landtrustalliance.org/policy/emerging-issues>

Maryland Power Plant Research Program:  
<http://www.dnr.state.md.us/Bay/pprp/>

Maryland Public Service Commission:  
[www.psc.state.md.us/](http://www.psc.state.md.us/)

Mid-Atlantic Concerned Citizens Coalition:  
<http://www.maccecc.org>

Pennsylvania Land Trust Association:  
<http://conserveland.org>

Piedmont Environmental Council:  
<http://www.pecva.org/anx/index.cfm/1,237,0,0,html/In-Depth-Resources>

**FOR MORE INFORMATION CONTACT:**

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