

Proposed National Interest Electric Transmission Corridors

Comments of Keryn Newman

June 17, 2024

I hereby request full party status to request rehearing and appeal any corridor designation made pursuant to this process. My contact information can be found at the end of these comments.

Expanding Easements to Site Parallel Transmission Lines is Greenfield Siting

The DOE's creation of a spider web of Mid-Atlantic NIETCs paralleling existing 500kV transmission lines in Pennsylvania, Maryland, West Virginia, and Virginia seems to be premised on the idea that expanding existing transmission easements or creating new parallel ones within a 2-mile wide corridor "maximizes existing rights-of-way" and therefore is preferred and will be easier to site and permit than greenfield NIETCs. The baseless presumption that proposed developments that are adjacent to existing disturbances (including transmission lines) will be assumed to have less impact compared to developments disturbing new green field routes/sites is simply not true. This old cliché from the last century must be abandoned. In this new era of energy/environmental justice, it is no longer acceptable to continue to impose energy projects on historically burdened communities so that others can escape impact.

Property owners vehemently oppose *all* new transmission rights-of-way that use the threat of eminent domain to acquire property. It doesn't matter if the new right-of-way is adjacent to an existing transmission line; it's still a new greenfield right-of-way that further erodes the use and enjoyment of property by a landowner already burdened by one transmission line. New transmission lines will inspire the same amount of opposition whether they are adjacent to existing lines or sited in areas without transmission. In fact, a line carefully sited on a new route designed to minimize impacts will actually cause *less* opposition than one carelessly sited parallel to an existing one.

The existing 500kV lines that the NIETCs parallel have been in existence for decades and while they may have originally been sited on agricultural land, much of the land surrounding them has since been developed into residential subdivisions, businesses, churches, schools, parks, fire stations and other modern uses. The expansion or paralleling of these existing easements for NIETC projects destroys everything adjacent to the existing right-of-way. There is no opportunity to route around obstructions when you are expanding, or "maximizing" existing easements.

Transmission line easements restrict use of the land in the easement. This is why landowners must be compensated for the taking of their property. FirstEnergy, owner of several of the 500kV lines in the proposed NIETCs, lists such restrictions on its website.¹ FirstEnergy prohibits the following in its easements: buildings, lighting fixtures, signs, billboards, swimming pools, decks, flag posts, sheds, barns, garages, playgrounds, fences or other structures, septic

¹ <https://www.firstenergycorp.com/help/safety/real-estate-power-lines/transmission-right-of-way.html>

systems, leach beds, and/ or wells. Expansion of existing easements will remove any existing prohibited uses from host property, interfering with the landowner's use and enjoyment of his property and lowering its resale value. In some cases, expansion of the easement may not just erase outbuildings and playgrounds, but may actually make the home uninhabitable. It doesn't appear that DOE has any idea of the number of homes or other incompatible land uses within its proposed corridors. This demonstrates a shocking presumption and lack of competency, destroying people's lives with the stroke of a pen on a map.

The Mid-Atlantic Corridor is Destructive to the Local Community

For these comments, I'm going to draw your attention to a short stretch of the proposed Mid-Atlantic corridor from the Bedington substation to the Doubs substation. This is where I have lived for the past 36 years and I know it well. The existing transmission line passes through numerous residential developments on a 200-foot wide right-of-way between the Bedington substation and the Potomac River crossing at Leisure Acres subdivision. This transmission line is at least 50 years old and was sited on farmland at the time it was constructed. Please see attached aerial maps of this area showing the proximity of homes to the existing transmission line easement.

- Dense development surrounding the transmission line as it exits the Bedington substation on the southeastern side.
- Greensburg Estates subdivision under development, with additional new homes directly adjacent to existing right-of-way not yet shown on the map.
- Potomac River Farms subdivision.
- Shepherd's Cove subdivision, under development (no map).
- Leisure Acres subdivision.

In the 1980's, the farm where this transmission line crosses the Potomac River was developed into a large lot residential subdivision named Leisure Acres. Numerous homes were built right up to the edge of the existing right-of-way. The NIETC proposal would expand this easement up to two miles in either direction to allow for the siting of one or more new transmission lines. It will obliterate Leisure Acres, as well as all the other existing subdivisions adjacent to the existing line.

The transmission line and its right-of-way are clearly visible running horizontally across the map before it makes a left-hand turn and crosses the Potomac River into Maryland. Five homes and their barns, swimming pools, and outbuildings are visible just below the existing line. Above the existing line and partially hidden in the trees at the end of May Court are two more homes, with a third right off Leisure Way. Expanding or adding another right-of-way on either side of the existing one will either come within feet of existing homes or encroach on the homes themselves. A home or other building cannot exist in a transmission line easement. Therefore either the homes to the north or the homes to the south of the existing line must be razed to make way for an expanded or additional easement here. It's not simply taking people's entire yards for new transmission, it's taking people's homes. Going north of the homes closer to the river is also not an option as the land drops off steeply and becomes river flood plain.

Leisure Acres is unique because it is the location where the existing line crosses the Potomac River. On the Maryland side of the river, the C&O Canal NHP runs parallel with the shore for more than 100 miles. It is doubtful that the Park Service will approve an additional crossing somewhere else instead of expanding the existing one. In order to expand this crossing, Leisure Acres must be destroyed. This is why expansion of this route has been rejected numerous times over the past 20 years. The first was the original routing of the Potomac-Appalachian Transmission Highline (PATH) project, which was withdrawn and rerouted only months after PJM's ordering of the project on this route. The second was more recent. In the fall of 2023, PJM rejected a proposed project in its 2022 Window 3 that would have added a second, parallel 500kV line to the Bedington-Doubs corridor. And now here it is again, dredged up by DOE's thoughtless expansion of existing transmission corridors. This corridor wasn't viable in the past and it's not likely to be viable in the future.

Directly adjacent to Leisure Acres on its east side is the National Conservation Training Center, a sprawling federal government complex. DOE's proposed NIETC encroaches into NCTC property; including the site of the center's popular online "Eagle Cam" that allows virtual access to the nest of a pair of Bald Eagles.²

Once the Bedington-Doubs 500kV line crosses the Potomac into Maryland, it must pass through the C&O Canal NHP. Further up the line, it comes in close proximity to Antietam Battlefield NHP. DOE's proposed two-mile wide NIETC corridor will have devastating impacts to the park's viewshed, and it may actually encroach into the park itself, although it's really hard to tell with the generalized maps DOE has provided for its proposed corridors.

I urge DOE to use current aerial maps to trace the NIETC routes it is proposing, before making dismissive conclusions that paralleling existing lines is less impactful than siting elsewhere. A new transmission right-of-way parallel to or in proximity to existing transmission lines is no different than a new transmission right-of-way elsewhere. However, the new line elsewhere can be re-routed to avoid obstructions; a parallel line cannot be re-routed and simply plows through everything in its way. DOE can point to nothing to support its notion that expanding existing easements to add new lines is "better" than siting them elsewhere. After you study the current maps, please stop by and I'll take you on a tour of all the homes you'll be razing in Jefferson and Berkeley Counties. Maybe we can knock on some doors?

This short stretch of proposed NIETC would create profound changes to land use and visual impacts for residential properties and federal facilities. It will impact homes, parks, schools, cemeteries, and churches, destroy prime agricultural land and protected farmland, and cross conservation easements. The impacts along the Bedington-Doubs transmission line are just one short stretch of one of the multiple segments of the DOE's proposed Mid-Atlantic Corridor. The same impacts will exist along other portions of this proposed NIETC. The Mid-Atlantic Corridor must be abandoned.

² <https://www.fws.gov/nctc/eagle-cam>

Opposition to the Mid-Atlantic Corridor is Present and Growing

Transmission fatigue is a situation where communities that have battled transmission lines in the past are knowledgeable, engaged, and educated to oppose, delay and cancel new proposals for the same area. Individuals, organizations, and elected officials that opposed the cancelled PATH project in Jefferson County, West Virginia are still here and we stand ready to vociferously oppose any new transmission project attempting to use these same failed routes. Adding fuel to the fire this time is the fact that these new transmission lines are for the express purpose of importing coal-fired generation from West Virginia to power new data centers in Northern Virginia. A new electric extension cord to power Virginia's economic development does not provide any benefit whatsoever to the West Virginia communities it crosses. In addition, this scheme does not meet Virginia's clean energy goals and opposition will be much larger and louder than last time.

DOE is Abdicating its Authority to Private Interests

The DOE must do better to properly evaluate the geographic and political aspects of its NIETCs and to make better choices so that corridors designated can actually be used for new transmission. Routing options parallel to existing transmission are limited or non-existent. These proposed corridors are non-starters, no matter how appealing they may be in other technical aspects. The DOE must recognize and consider these facts.

Rebuilding of existing transmission lines completely within existing easements may be a viable option, however a NIETC is not necessary to accomplish this. PJM Interconnection would be the entity to determine whether a line shall be rebuilt, and only PJM can determine whether the existing line can be taken out of service long enough to accomplish the rebuild. Heavily loaded lines are unlikely candidates for rebuilds. DOE does not possess any authority, expertise, or system awareness to make this determination.

Congress intended DOE to be a leader in finding the right places to deploy new transmission. DOE should be designating NIETCs that encourage utilities to deploy new technology to build the transmission grid of the future. Sadly, DOE has chosen to be a utility follower, encouraging more of the same, old overhead transmission from the last century; transmission that Thomas Edison would easily recognize. The DOE has no expertise in transmission line routing; even utilities hire contractors for that purpose. Pretending that designating a 2-mile wide corridor paralleling existing transmission lines is not an exercise in transmission line routing only dooms NIETCs to failure. There's no point in designating a NIETC in a geographic area where it is impossible for a utility to successfully route a new transmission line.

It appears that DOE has chosen to simply draw some lines on a map of existing 500kV transmission lines from the last century that were used to export West Virginia's coal-fired electricity to the Washington-Baltimore metro area. This perpetuates the use of legacy coal-fired power stations in West Virginia and increases carbon emissions. DOE must consider modern alternatives to "more of the same."

Maximizing existing rights-of-way is not limited to utility rights-of-way. A new generation of electric transmission projects is emerging that don't require sacrifice on the part of unfortunately selected landowners and communities, especially long-distance transmission that does not need to make connections on the way to its destination, such as bulk power imported to Data Center Alley. New HVDC transmission projects are proposed to be buried along highways and railroads, or underwater, that don't require new easements or the use of eminent domain to create new transmission corridors.³ The benefits of new transmission buried on existing transportation rights-of-way or under bodies of water are numerous.

- Negotiation with only one landowner for use of existing right-of-way
- Cheaper land acquisition
- Less opposition and delay
- Buried lines are weather and terrorist resistant
- Buried lines do not start wildfires
- No perpetual vegetation maintenance required
- Faster permitting and construction timeline with no land clearing required

Despite all the advantages of new transmission buried on existing transportation rights-of-way, stodgy, old utilities will avoid trying something new, preferring to continue to build Thomas Edison's electric grid of the past. The DOE could show incredible leadership and make NIETCs a win-win for everyone if it created them on transportation corridors in order to yank utilities into the 21st Century.

There's certainly no shortage of west to east transportation corridors. Routes 68 and 70 connect the DC metro area to numerous coal-fired power plants in West Virginia. South of that, Route 50 connects West Virginia to Northern Virginia. Even further south, Route 522 makes the same connection. There are many highway options to choose from instead of expanding existing transmission corridors using eminent domain to add additional overhead transmission lines. Several options exist for west-east rail corridors as well.⁴ With just a little more effort, and a lot of ingenuity, DOE could create NIETCs that not only promise faster permitting without opposition, but that don't need to take new land using eminent domain. If such innovation were used by utilities, we wouldn't need NIETCs in the first place. DOE can either be a hero... or a zero.

The Mid-Atlantic Corridor is not in the Interest of National Energy Policy

According to Section 216(a)4(D), the DOE must consider whether "the designation would be in the interest of national energy policy". Current national energy policy is to reduce carbon emissions. The proposed Mid-Atlantic NIETC will actually increase carbon emissions by providing new markets for over 7,000 megawatts of coal-fired generation in West Virginia. As drawn on DOE's map, the Mid-Atlantic NIETC begins at West Virginia coal-fired generators and ends at Loudoun County, Virginia's "Data Center Alley." It's nothing but a series of

³ See SOO Green HVDC Link, Champlain Hudson Power Express, Clean Path NY, New England Clean Power Link, Lake Erie Connector, Cascade Renewable Transmission. See also The Ray, Right-of-Way Transmission, <https://theray.org/technology/transmission/>

⁴ <https://openrailwaymap.org/>

gigantic electric extension cords, plugging Northern Virginia into coal-fired electricity produced in West Virginia. At its western end, the proposed NIETC connects to the Mitchell Power Station⁵ (1,632MW), Longview Power Station⁶ (700MW), Ft. Martin Power Station⁷ (1,098MW), and Harrison Power Station⁸ (1,984MW). On its journey east, it also makes a connection to the Mt. Storm Power Station⁹ (1,662MW). Opening new markets for these coal-fired power stations increases their revenue and longevity. In February of 2024, FirstEnergy announced that it was abandoning its 2030 climate goal due to PJM’s ordering of new transmission from Ft. Martin and Harrison to Northern Virginia data centers.

“After careful consideration and evaluation, in late 2023 we made the decision to remove our interim target to achieve a 30% reduction in GHG emissions by 2030 from a 2019 baseline since achieving it is not entirely within our control. FirstEnergy’s core business is the transmission and distribution of electricity. However, emissions from our West Virginia regulated generating operations – consisting of two coal plants, Fort Martin and Harrison – serve as the main source of our Scope 1 emissions and greatly outnumber the emissions from our transmission and distribution operations. As such, our 2030 interim target was dependent on GHG reductions at Fort Martin and Harrison that could be realized only through a meaningful reduction in operation of these two plants prior to 2030.”¹⁰

FirstEnergy has extended the useful life of Ft. Martin from 2030 to 2035, and Harrison from 2030 to 2040.

“Achieving the 2030 interim goal was predicated on meaningful emissions reductions at our Fort Martin and Harrison power plant in West Virginia, which account for approximately 99% of our greenhouse gas emissions.

We’ve identified several challenges to our ability to meet that interim goal, including resource adequacy concerns in the PJM region and state energy policy initiatives. Given these challenges, we have decided to remove our 2030 interim goal. Through regulatory filings in West Virginia, we have forecast the end of the useful life of Fort Martin in 2035 and Harrison in 2040.”¹¹

However, new environmental regulations¹² may make all these coal plants uneconomic to operate after 2032. NIETCs encouraging the building of new transmission to resources that won’t be there is akin to the proverbial “building a road to nowhere.”

In DOE’s “Guidance” for designation of NIETCs, the following statements were made:

⁵ https://en.wikipedia.org/wiki/Mitchell_Power_Plant

⁶ https://en.wikipedia.org/wiki/Longview_Power_Plant

⁷ <https://firstenergycorp.com/content/dam/corporate/generationmap/files/FE-Ft%20Martin%20Fact%20Sheet.pdf>

⁸ <https://www.firstenergycorp.com/content/dam/corporate/generationmap/files/FE-Harrison%20Fact%20Sheet.pdf>

⁹ https://en.wikipedia.org/wiki/Mount_Storm_Power_Station

¹⁰ <https://fecorporateresponsibility.com/fecorporateresponsibility/environment/climate-story.html>

¹¹ <https://seekingalpha.com/article/4669081-firstenergy-corp-fe-q4-2023-earnings-call-transcript>

¹² <https://www.wri.org/insights/epa-power-plant-rules-explained>

- DOE will “facilitate the construction of critical transmission infrastructure in areas of the country that, through the rigorous and independent NIETC designation process described in this Guidance, DOE has determined to have the greatest need for transmission to enhance reliability and resilience and reduce consumer costs by **providing access to low cost, clean energy resources.**”
- “The Biden-Harris Administration has set national goals to **reduce U.S. greenhouse gas emissions** at least 50% below 2005 levels by 2030 and to reach net zero emissions by 2050. These goals include transition to a 100% clean electric power sector by 2035.”
- “The proliferation of state and local clean energy standards and goals as well as private-sector clean energy purchase commitments further underscores the nation’s **need for additional transmission infrastructure to deliver clean, reliable, and low-cost energy.** NIETC designation is an important tool that DOE has available to facilitate the timely development of transmission infrastructure to meet all these needs.”
- “DOE does not attempt in this Guidance to define the bounds of adverse effects on consumers that may warrant NIETC designation, but does clarify that such effects are not limited to economic impacts nor to a certain time horizon. Particularly in light of the **growing consumer demand for clean energy,** transmission capacity constraints or congestion that do or will **inhibit access to a diverse and clean energy supply also adversely affect consumers.**
- DOE’s goal is to facilitate greater development of needed transmission infrastructure for reliability, resilience, and **decarbonization** purposes.

Obviously, DOE’s proposed designation of the coal-fired extension cords in the Mid-Atlantic corridor does not comply with DOE’s own guidance regarding the Administration’s goal to reduce greenhouse gases. This fact alone should be reason enough to scrap the Mid-Atlantic corridor. It will do the exact opposite of DOE’s guidance by increasing greenhouse gases.

New Generation Near Load Obviates the Mid-Atlantic Corridor

Of course, we wouldn’t need new transmission at all if we spent as much effort, time, and money building new generation near load

DOE must acknowledge that its proposed Mid-Atlantic corridor is only necessary to supply power to data centers in Northern Virginia, and that the power supplied is coming from coal-fired power plants in West Virginia that may be shut down by 2032. The power plants may be shut down long before any projects in the proposed NIETC can be built. It makes little sense to build a long-term (40 year) asset like transmission to a resource that may no longer be there. It is also unlikely that an equivalent amount (more than 7,000 MW) of new power supply will be built at the existing power plant sites to which the NIETC connects. Considering the amount of land needed for each megawatt of wind and solar power generation, it is a statistical impossibility. DOE cannot point to any viable plan to replace the West Virginia generation with another power source, which makes the proposed corridor a useless “road to nowhere.”

A better alternative is to build necessary new power generation near the data center load. The safest, cheapest energy system is one where source and sink are geographically adjacent. There’s

nothing stopping the addition of new generation capacity in Virginia, except Virginia itself. Virginia could build in-state generation from natural gas, biomass, waste-to-energy, nuclear, small modular nuclear, other large-scale power generation in close proximity to the data center load. However, building in-state gas generation is constrained by Virginia's energy policy, which could be changed to support the data centers it wants to build. Instead, DOE proposes to use corridors to force new transmission on neighboring states because it cannot force generation choices in beneficiary states. Something is wrong with this scenario. Virginia is reaping all the economic windfalls that come with the building of new data centers in Northern Virginia. Neighboring states are not recognizing any benefit. Instead, West Virginia will mine and burn more coal to supply Virginia's data centers, polluting the West Virginia environment and the air that everyone in the region shares. Landowners in West Virginia will have their land taken from them involuntarily to host infrastructure that only benefits Virginia and some of the richest companies in the world, like Google, Amazon and Facebook. Adding insult to injury, West Virginians will also have to pay for a portion of the new transmission infrastructure that benefits others.

The Mid-Atlantic Corridor is an Environmental Injustice to West Virginia

Sacrificing West Virginia's environment and imposing new costs on its struggling consumers for benefit of Virginia's economy and the profits of the corporations who operate there is the epitome of environmental and economic injustice. Virginia ranks tenth in the list of average salaries by state, with an average annual salary of \$65,590. West Virginia ranks 48th on the list, with an average annual salary of \$49,170.¹³ West Virginia is never going to economically catch up with surrounding states if its citizens are forced to pay a significantly larger share of their income to support the economic development of surrounding states.

The DOE would never suggest that new polluting energy infrastructure to support Virginia's data centers be sited in existing communities that have historically been impacted by polluting energy infrastructure. DOE considers these "energy communities" that should be relieved of their burden to supply energy to other communities. However, that is *exactly* what DOE is proposing with its intention to site NIETCs parallel to existing transmission lines. Landowners hosting transmission lines are already burdened with dangerous, invasive, obstructions that interfere with their daily lives, and in some instances with their livelihood if their land is their source of income, such as farming. These landowners have already "taken one for the team" to supply land for transmission lines that serve others. Suggesting that these same landowners be burdened with additional transmission infrastructure so that others can escape any impact at all is akin to suggesting that new coal-fired power plants be built next to existing ones.

DOE must take into account energy burden on communities hosting existing transmission infrastructure, economic disparities, and environmental justice when designating NIETCs. Transmission is never beneficial to host landowners. Payments for new easements are NOT a windfall or profit for host landowners. Easement payments are strictly *compensation* for the land they have had involuntarily taken from them. Landowners do not profit from new transmission. Likewise, West Virginians do not benefit from the increased burning of coal in order to sell more power to Virginia. The out-of-state energy corporations that own those coal-

¹³ <https://www.marketwatch.com/guides/business/average-salary-by-state/>

fired power plants are not re-investing their increased profits in West Virginia or providing any windfall to West Virginia citizens impacted by new transmission extension cords for data centers. All the gold from coal goes out of state and the only thing West Virginians get is the shaft.

The Mid-Atlantic Corridor Will Increase the Cost to Purchase Electric Energy

Section 216(a)4(H) requires that “the designation would result in a reduction in the cost to purchase electric energy for consumers.” This is not a discretionary factor. A corridor must produce a reduction in consumer costs. The DOE has not even attempted to show a reduction in consumer bills associated with a NIETC designed to import coal-fired electricity from West Virginia to Northern Virginia data centers. Considering that *but for* the data centers, this transmission would not be necessary; the cost of any new transmission in the proposed NIETC can do nothing but increase consumer costs. In addition, DOE must address the issue of cost shifting that would occur with the designation of this corridor. Although only the data centers are served by new transmission extension cords in the corridor, all consumers in the PJM region will pay for the new transmission. Here’s an analogy for DOE to think about: If I built a new house on top of a mountain, I would have to pay to run the distribution line to my new house from the nearest connection point. Due to the amount of power they use, transmission is the distribution line used by data centers. Data centers are not paying the cost of connecting their new buildings in the same way consumers would, but are instead shifting the cost of their new connection to other customers who do not benefit. The richest corporations on the planet are increasing their profits on the backs of struggling electric consumers. This is not just and reasonable.

Designation is a Taking Without Compensation

DOE’s designation of NIETCs is a land-use planning determination that usurps local planning and zoning of properties inside a corridor. A NIETC designation determines that land in the corridor has been selected as the preferred place to build new transmission lines and is to be the first place for utilities to site new transmission projects. It is unclear whether DOE has the legal authority to make these kinds of land use decisions.

Landowners who have transmission easements on their property have either been paid for that easement, or made their own determination that they can live with the easement that exists on property they purchase. Designating a NIETC for the purpose of expanding the existing easement to build additional transmission takes the rest of the owner’s land, piece by piece. The property is slowly chopped up until it is fully consumed by new transmission lines.

Designation of an NIETC decreases property value and marketability of impacted properties. Who would want to purchase a home in a NIETC with the knowledge that it can be taken at any time using federal eminent domain? Who would want to purchase land in a NIETC to build a home or business? A NIETC designation plunges a landowner into a perpetual purgatory of not being able to sell their property, build on their property, or invest in improvements. The decrease in property value is rooted in the perceptions of potential buyers. Does the buyer want to risk their investment being taken at “fair market value” by a utility to build new transmission

lines? Or would the buyer pass on such a property and invest in another that does not have the same NIETC cloud attached to it? A NIETC designation takes value from all properties within its borders. It changes future use of the land in such a corridor and makes it undesirable for other purposes. **NIETC designation is a taking**. DOE has not proposed any compensation for such a taking. Our Constitution protects us from government takings without compensation.¹⁴

Our Constitution also protects our due process rights that DOE has willfully violated by refusing to provide notice to impacted landowners at Phase 2 of its NIETC designation process. DOE has stated that any person who comments during Phase 2 automatically receives party status that affords them the right to request rehearing or appeal a NIETC designation. By making that statement, DOE infers that party status may not be granted by right at later Phases of the NIETC designation process. By refusing to provide notice to impacted landowners during Phase 2, DOE is thwarting due process of law for these citizens while it considers depriving them of their property.

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Attachments:

Maps of siting constraints along the Bedington-Doubs 500kV transmission corridor.

¹⁴ “No person shall be... deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.” U. S. Const. amend. V

SOUTHEAST OF BEDINGTON SUBSTATION



GREENSBURG ESTATES SUBDIVISION



Layers

Google

POTOMAC RIVER FARMS SUBDIVISION



POTOMAC RIVER FARMS SUBDIVISION



Public Boat Ramp

MARYLAND
WEST VIRGINIA

LEISURE ACRES SUBDIVISION

Power Plant

Dam 4

Dam Four Rd

Ackermann Ln

Dam Four Rd

Leisure Way

May Ct

Ella Dr

Ella Dr

Leisure Way

Ella Dr

Google



**LEISURE ACRES
SUBDIVISION**

Potomac River Reservoir

Potomac River

Chesapeake and Ohio Canal

Potomac River

U.S. Bicycle Rte. 50

Chesapeake and Ohio Canal

Public Boat Ramp

MARYLAND

Potomac River

MARYLAND
WEST VIRGINIA

Dam 4

Dam Four Rd

Ackermann Ln

Leisure Way

Rockymarsh Run

Dam Four Rd

May Ct

Ella Dr

Ella Dr

Google

Layers