

Opinion letter by Professor Paulius Kavaliauskas and co-authors explaining the negative impact on the landscape

(Unofficial translation from Lithuanian)

2010, July 28th

To:

UAB „Sweco Lietuva”,
AB “Lietuvos energija“,
President of the Republic of Lithuania
Ministry of Environment of the Republic of Lithuania,
Ministry of Energy of the Republic of Lithuania,
Environmental protection committee of the Parliament of the Republic of Lithuania,
Department of the Cultural Heritage,
State agency for protected territories,
Lazdijai district municipality,
Kalvarija municipality,
Alytus district municipality,
Sejny municipality of the Republic of Poland,
Punsk municipality of the Republic of Poland,
Member of the European Parliament Ms Radvilė Morkūnaitė

REGARDING THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT ON CONSTRUCTION AND OPERATION OF A 400 KV ELECTRICAL POWER TRANSMISSION OVERHEAD LINE FROM ALYTUS POWER SUBSTATION TO THE STATE BORDER OF THE REPUBLICS OF LITHUANIA AND POLAND

In June of 2010 UAB Sweco Lietuva performed an environmental impact assessment (EIA) for the planned economic activity and prepared an EIA report. The report analyzed two alternatives for the route of an electric power transmission overhead line (OHL), named as alternatives A and B (the latter including two sub-alternatives B1 and B2). These alternatives, as the most suitable ones, were identified based on the report of strategic environmental assessment (SEA) performed by the above-mentioned company in May the same year, and on the Master Plan of the territory of the Republic of Lithuania (MP) prepared between 1998 and 2002. The latter document foresaw OHL construction in Alytus County, without identification of an exact route, by geometrically interconnecting Alytus town and the state border zone close to Lazdijai town, respectively. However, since adoption of the MP, the administrative division of the country has changed, as well as important EU laws have been adopted.

We state that the EIA report is prepared rather as a formality, without taking into account the extensive recent research data (e.g. the geomorphological structure is described based on the information dating back to the Soviet period; by ignoring the up-to-date Lithuanian geomorphological map 1:300 000 by the State Geological Service, which reveals the uniqueness of the hill formation in the borderland region; a completely analogous situation is in the case of presentation of the landscape, a description that ignores even the study on the Lithuanian landscape spatial structure diversity and identification of its types, performed in 2005-2006 in compliance with the European Landscape Convention) and without performing any geomorphological

structure and landscape value analysis of the zones under consideration, without taking into account the landscape and culture heritage solutions of the general plans of Lazdijai district municipality and Alytus County, respectively. Having performed no necessary and satisfactory value analysis, the impact of the planned economic activity on the ecological framework of international importance in the Lithuanian-Polish borderland, on the valuable unique landscape, and on the cluster of historical heritage sites in Lazdijai district municipality was estimated irresponsibly:

1. The foreseen OHL alternatives would destroy the Vingrėnai geomorphological reserve, which is included in the general plan of Alytus County with the aim to protect an outstanding and structurally unique cluster of parallel moraine hills together with the highest point in Dainava region. The infrastructure expansion on such a scale would damage and visually deform one of the most spectacular and representative sections of the Baltic lake hill region belt in the Republic of Lithuania that is a part of the Valday-Baltic-Pomeranian hill region of European importance. These negative impacts are completely overlooked in the EIA report.

2. The previously restricted state border region in Lazdijai district is rich in a biological and landscape variety that has been not sufficiently investigated yet. The EIA acknowledges the existence of valuable flora areas. However, there is no detailed data on the impact on the diversity of birds and animals in the section between Lake Rimietis and the OHL crossing point of the state border, despite the fact that Lake Galadusys on the Polish side is a Natura 2000 area for bird protection. Also, in the general plan of Lazdijai district municipality a 300 ha protected area is foreseen along Lake Galadusys on the Lithuanian side too.

3. The territory of Lazdijai district municipality, which is proposed as a location of the OHL, in the general plans has been already reserved for the following types of the ecological framework management:

- 1) Maintenance and protection of the current natural character of the landscape (A3, B3, C3)
- 2) Maintenance and improvement of the natural character of the landscape (A2, B2, C2)
- 3) Restoration and multiplication of the elements for reconstruction of the natural character of the landscape (A1, B1, C1)

Although the planned economic activity without any doubt would disintegrate the entire cluster of the natural and cultural landscape as well as the historical heritage values, the EIA report does not analyze this impact. For example, this cluster contains the unique and dense network of archeological sites of the Jotvingian culture in the environs of Rudamina and Verstaminai. The Polish and Lithuanian scientific literature attributes this heritage to the historical domain of Kirsnowia dating back to the Medieval Ages. This network, which consists of 13 archeological monuments, mainly the hill forts, would be fragmented by the OHL. It is completely unacceptable that the alternative route B of the OHL belt stretches along the visual protect zone of Rudamina hill fort, which is one of the most spectacular sites of this kind in Lithuania and is very important for the identity of the local communities. The EIA report ignores the impact on the National Independence monument – the Memorial of Kalniškė forest battle, although the identified OHL belt is within a distance of 100-200 m from this site. The planned economic activity also damages the complex management zone for cultural heritage sites, which is designated in the general plan of Alytus County. Although the EIA report states that Lazdijai district lacks preserved “valuable ethnographic villages”, the OHL belt is located next to the only ethnographic museum in this area and it crosses Karužai village, which still has many authentic countryside buildings from the pre-war period

and is the oldest recorded settlement in Lazdijai region. Notably, the community of Būdviėtis eldership has established a non-governmental museum that is located close to the above-mentioned Vingrėnai landscape area and has already become one of the most attended tourist attractions in Lazdijai district.

We propose a possible compromise solution that would minimize the enormous negative impact of the planned economic activity on the environment and communities of Lazdijai region, on their opportunities to collaborate with the neighboring Sejny and Punske municipalities (in Poland), as well as on the establishment and strengthening of the local identity, recreational, tourism and ecological potential. Our proposed alternative would prevent the unnecessary loss of the valuable territories, yet without suspending the Lithuanian-Polish power interconnection project:

1. In the territories of Alytus and Lazdijai district municipalities, the existing 110 kV OHL Alytus- Šeštokai could be upgraded and also in the latter area the land plots reserved for industrial activities could be utilized for construction of the remaining section of the OHL.
2. The state border crossing point of the OHL should be moved to the neighboring Kalvarija municipality, taking the advantage of the 10-15 km long section of the infrastructural corridor designated in the general plan (see the attached drawing of the engineering infrastructure from the general plan of Kalvarija municipality). Also, according to our information, a correction of the general plan of Kalvarija municipality is foreseen, an opportunity to coordinate with the special planning procedures for the OHL.

Also, we would like to point out that it is unacceptable that during the planning process of such a massive infrastructural upgrade in the section Kruonis-Alytus-the state border, there has been no adequate measures undertaken since the preparation of the MP (in late 1990ies) to select the locations that would minimize the obvious impact on the environment on the national scale. For example, a route omitting the UNESCO-protected bird reserve of Lake Žuvintas and the Dainava hill area could have been chosen in more industrialized territories, also in more extensively used agricultural zones in Marijampolė and Kalvarija municipalities, in the other infrastructural corridors, etc. This project concerns the ecological framework and the geocological ridge of European importance that stretch across Lithuania and Poland and that comprises many Natura 2000 protected territories. Therefore, in addition we ask the Ministry of Environment to assess if the undertaken special planning procedures are in compliance with the European Landscape Convention as well as with the Directive 2001/42/EC. Also, we would like to emphasize that for effective public participation in the special planning procedures and in the EIA of this project, there should be measures undertaken such as a broader engagement of experts, direct informing of the NGOs potentially concerned, direct contact with the local population, etc. As in the undergoing special planning procedures this has not been the case, we are of opinion that the public interest has not been properly represented.

Annexes: 1 photograph and 4 schematic drawings prepared based on the solutions of the Alytus County and Kalvarija municipality general plans and on a scheme from the EIA report.

Algirdas Patackas, Signatory of The Independence Act of The March 11th
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