

## Letters Received Regarding Proposed Transmission Upgrades in Advance of the August 6, 2024 Transmission Expansion Advisory Committee Meeting Related to the Maryland Piedmont Reliability Project

The following emails and letters were submitted to the Secretary of the PJM Members Committee - David Anders - pursuant to the Board Communications process and are being posted pursuant to that process. A response will be provided to these communications in due course and will be posted on the Board Communications page as well.

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**From:** Caryn N. Joachim

**Sent:** Sunday, July 28, 2024 1:51 AM

**To:** Takahashi, Mark; Asthana, Manu; Anders, David

**Subject:** Opposition to MPRP - please read

Sunday, July 28, 2024

To Mr. Takahashi, Mr. Asthan, and Mr. Anders (Chair and Members of the PJM Board) ,

I am writing in protest to the proposed Maryland Piedmont Reliability Project. The power lines go through the width of my farm, directly behind my house. I live at 5328 Trenton Mill Road, Upperco, MD 21155. I bought my parents' farm and home two years ago, 5306 & 5334 Trenton Mill Road. This 60 acre property has been in the family for 100 years, has a farm house that dates back 150+ years, a spring, wetlands, and stream, and is home to many wild animals.

The purpose of this project is a land grab by means of eminent domain to build new power lines to a Data Center in southern Frederick county to benefit Northern Virginia, as a state they are the "Data Capital of the World", and this is their continued goal. This project will only benefit the New Jersey company of PSGE for their corporate gain and the residents and businesses of Virginia. The project will not benefit the Maryland residents whose land is being destroyed and confiscated. We cannot follow this trend of Green Energy and forced agenda at the expense of actually destroying what is in fact GREEN and BEAUTIFUL – our wonderful rural setting of pristine farms, many in land preservation in North Central Maryland. This is greedy, self-seeking, disgusting, and unacceptable.

The effects of this project will forever ruin the land for owners and all those who live close by and **will set a precedent of "Land Grabs for any means that are deemed essential at the time – that are in fact NOT essential at all"**. The Data Centers being built to support the increase use of the internet and Cloud Storage, could in fact use existing power lines or other sources of energy at the actual Data sites.

***When I think of times in the past in which land in this area was obtained by the government, it was always to benefit those who lived here.*** Roads were planned before populations expanded in areas agreed upon by local, county and state officials. The three reservoirs of Baltimore City (Loch Raven, Prettyboy, and Liberty), built in that order, did take land from home & farm owners for the purpose of having a reliable water supply for the people living right here in Baltimore, but the people who lost their property could move elsewhere as

land was plentiful and affordable, and the Reservoirs added to the Beauty and Rural setting, providing Nature escapes of boating, fishing, and hiking, and also allowed for continued and new land and water animal habitats. I lead hikes at Prettyboy Reservoir for the Mountain Club of Maryland, and this treasured area is enjoyed not only by locals, but also by residents all over Maryland. In Contrast, this project will ruin precious land that can't be replaced and will not benefit anyone who lives here. All of this is unacceptable - this project shouldn't even be considered.

My property, along with surrounding farm properties, were all willingly placed in Land Preservation, which the State paid for and with funds approved by voters of Maryland, to preserve the rural, environmental, and economic resources in the area. We chose to give up our rights to develop the land in the future to forever preserve the pristine nature of this area. Now an outside company is being allowed to propose destroying all of this, not for the benefit of anyone in Maryland, but only to enhance their profits and corporate gain !!

This Land Grab is shameful and disgusting. ***My husband and I, along with the residents of Baltimore, Carroll, and Frederick counties, will use all of our strength, resources, power, and resolve to fight this greedy and selfish Land Grab under the facade of "Green Energy".***

Sincerely,

*Caryn N. Joachim*

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**From:** Lori Barnard

**Sent:** Sunday, July 28, 2024 8:15 AM

**To:** Takahashi, Mark; Asthana, Manu; Anders, David

**Subject:** Protest of PSEG Project

Dear PJM Board of Managers,

I wish to present my protest of the proposed PSEG project. I cite the following concerns and objections to this project:

1. This project does absolutely nothing to reduce energy generating climate change damage. It simply allows for the generation of energy across state lines and even worsens the effect on our climate by transmitting the heat generating electricity across our state, primarily for the use of another state.
2. While the lines are currently projected to be about ½ mile from our small farm I strongly oppose seeing my neighbors lose land, farming income, and home values to support data centers, primarily in Virginia, and bringing no direct value to the community that will be damaged by this project.
3. While the electric companies state there have been studies claiming these high voltage power lines do not cause damage to persons or farm animals I have found several studies that provide evidence to the contrary. Several people in this local community already live with high power lines over their properties. While the existing lines transmit

substantially less wattage than the projected lines these people have talked about humming noises, static, and even suffering of their farm animals. I can't imagine the damage this would do to the thousands of people that would have these new higher wattage lines running across their properties.

Thank you,  
Lori Barnard  
Frederick County, MD

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**From:** Katharine Hinder  
**Sent:** Sunday, July 28, 2024 11:03 AM  
**To:** Takahashi, Mark; Asthana, Manu; Anders, David  
**Subject:** Maryland Piedmont Reliability Project

**Mr. Mark Takahashi**  
**Chair, PJM Board of Managers**

**Mr. Manu Asthana,**  
**PJM President & CEO**

**PJM Interconnection, LLC**  
**2750 Monroe Boulevard**  
**Audubon, Pennsylvania 19403**

Dear Mr. Takahashi and Mr. Asthana:

As a member of Maryland's land trust and land conservation community, I am writing to express vehement opposition to PJM and PSEG's proposal to route a high-voltage transmission line across conserved land in Baltimore County, specifically the Piney Run Watershed Rural Legacy Area.

The southernmost route for the new transmission line runs directly through my family's property, which is just north of Mt. Zion Road, in the Piney Run Rural Legacy Area. My family and I are completely devastated and appalled that this generations-old property, **over 650 acres of contiguous conserved land**, could be desecrated in such a manner.

The photograph below, which is the face of the Piney Run Rural Legacy Area, as photographed by the Department of Natural Resources, is our entire farm. If this transmission project moves forward, this view will cease to exist. Our beautiful Mt. Zion Hill, the scenic overlook between two of Baltimore County's Scenic Byways, will be bisected by a transmission line, and senselessly marred forever.



Piney Run. Photo by Maryland Department of Natural Resources/Flickr.

Our land, *Clearbrook Farm*, means everything to my family. It is an absolutely breathtaking property that we are grateful to live on every day. It belonged to my great-great grandfather, and has been carefully tended by our family for over 75 years. I grew up here with my three sisters, and it is now where I am raising my two small children, alongside my parents. My family chose to place all of this land in conservation because we believe in the values of land preservation and believed that it would be protected in perpetuity.

While grid reliability goals must be met, I strongly disagree with the way this transmission line will degrade the agricultural and rural heritage of this unique area of Baltimore County. Secondly, I seriously question the level of transparency behind this project's goals as they relate to public need.

Preserved land, including farms and vital environmental areas, are critical to the character of rural Maryland. The Piney Run Watershed Rural Legacy Area is a haven for agriculture, open spaces, environmental conservation, rural tourism, and historic preservation. Building transmission lines here would impact all of its residents (past, present, and future), our environment, and put our legacy at risk.

Preservation of land in the Piney Run Rural Legacy Area protects thousands of linear feet of vegetative stream buffers along tributaries feeding the Prettyboy and Loch Raven Reservoirs. These reservoirs in turn provide drinking water for an estimated 1.8 million people in the Baltimore Metropolitan Area.

Not only does the Piney Run Rural Legacy area stand out as one of the largest areas of conserved land in the state, but it is the site of two historic scenic byways: The Horses and Hounds Scenic Byway and the Falls Road Scenic Byway. These scenic thoroughfares provide an important public good, and are an integral part of Baltimore County's nature-based tourism industry. Maryland Department of Natural Resources, Maryland Environmental Trust, and other statewide conservation organizations have invested enormously to preserve important landscapes and sites along these picturesque routes.

PJM is condoning the malicious targeting of conserved land for a project that has in no clear way been shown to serve a public need for Marylanders. Further, perpetrating the destruction of forests, productive farmland, tributaries, wetlands, and countless carefully preserved ecosystems is poor repayment indeed for landowners who made the thoughtful choice to preserve these landscapes for all to benefit from, for the public good.

The power of eminent domain should only apply when undeniable public need is established. PJM has not provided adequate and transparent reasons as to what this need is, and why this project proposal is the only means of achieving it. MPRP has garnered an outcry of protest from landowners, government representatives, and environmental advocates voicing that *our* public interest, as Marylanders, is in fact not aligned with the goals this project aims to fulfill. The transmission routing is clearly taking advantage of conservation easements and their landowners by targeting preserved land as a means of achieving the most cost effective route. Thus, landowners in conservation are paying three-fold for a transmission project that has no clear demonstrable benefit to Maryland ratepayers.

I concur with Maryland's Office of People's Council that PJM has violated the terms of engagement in their lack of transparency, as well as in the speed at which this project is being pushed through without time for key stakeholders, constituents, and landowners to weigh in. We take seriously our mandate to protect this land, and we will take every possible course of action to save it.

Sincerely,

Katharine Harwood

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**From:** Dan Baker

**Sent:** Tuesday, July 30, 2024 5:42 PM

**To:** Takahashi, Mark; Asthana, Manu; Anders, David

**Subject:** FW: Maryland Piedmont Reliability Project

Board of Managers of PJM,

Below is a message I sent to the Maryland Public Service Commission yesterday. PSEG is your contractor and therefore you are responsible for their work. Your "public information" effort, as currently being executed by your contractor is woefully inadequate. PSEG representatives at the public information meeting I attended in June, in Hereford MD, could not answer substantive questions.

Answers were qualified with “as far as I know” or “at this time” and similar statements that render any answer given, meaningless.

1. I found only one PJM employee present. He was sitting on the sidelines as I persistently questioned a PSEG employee who adroitly deflected my queries. The PJM representative finally stood up and provided me the only useful piece of information of the evening, advising me that the Maryland Public Service Commission would have the final decision on this project. Public input differs from what you are calling public information meetings or public engagement, currently underway. Public input, as required by regulation, can only be meaningful if allowed early in the process, well publicized, open, transparent, and with sufficient prior notice.
2. I asked a PSEG engineering representative why an existing BGE transmission line, running less than a mile from our farm, and connecting the points the MPRP will connect is not being used. Parts of that right of way (ROW) at the beginning and end of the MPRP line, are proposed to be used. Using the entire existing ROW makes more sense than destroying virgin farms, forests, and wetlands to create a new ROW parallel to an existing one a short distance away. He told me this was technically not feasible and that BGE would not allow it. Both of these statements are falsehoods, and I am certain he knows that. The BGE ROW I refer to I think is about 50 years old. From what I have observed with other lines of this vintage in the northeast, it is likely to be renovated soon. Improvements in tower structures and conductors can enable additional 500kV voltage lines on existing rights of way. Existing ROW's can be expanded at considerably less cost and disruption than new ones. Is this not what the Doubs-Goose Creek line, which is estimated to cost \$65.8M. (\$4.3M / mile) is accomplishing? A seventy mile rebuild on the existing BGE ROW might cost only \$300M rather than the \$424M currently planned for the MPRP and not destroy our land in the process. This brings up another question. How can the \$424M MPRP budget possibly be correct? If construction cost in a new ROW is similar to construction in an existing ROW, then MPRP is providing only \$124M for the acquisition of a new ROW which cannot possibly be correct for a 70 mile ROW. I assure you most of the ROW required by MPRP will need to be condemned by Eminent Domain which will be a lengthy and expensive process.
3. DOE, PSC, and PJM studies show differing findings as to line “congestion” and they appear to be based on different measurement approaches. Justification of MPRP, as called out in your own information, is largely directed at serving data centers, not public needs or reliability. Raping our countryside for private economic gain under the guise of “public good” is despicable. PJM must be held accountable, and this project not allowed to proceed.

Respectfully yours,  
Daniel Baker  
Upperco, MD

Dan Baker



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**From:** Dan Baker  
**Sent:** Monday, July 29, 2024 4:11 PM  
**To:** [piedmontcomments.psc@maryland.gov](mailto:piedmontcomments.psc@maryland.gov)  
**Cc:** [info@thelandpreservationtrust.org](mailto:info@thelandpreservationtrust.org)  
**Subject:** Maryland Piedmont Reliability Project

Commissioners,

The proposed power transmission project proposed by PJM and PSEG is fundamentally flawed and should not be allowed to proceed.

1. The need for the project has not been demonstrated. There is a lack of transparency and clarity as to what public good is truly provided by the project. The public information meetings held thus far are inadequate. Information provided was incomplete and opaque on all questions of importance, frankly, an insult to the intelligence of our community.
2. Existing power transmission right of ways should be upgraded and utilized. PSEG representative openly misrepresented the potential for this at public information meetings by insisting that use of existing right of ways was not possible. It is entirely possible with fundamental improvements in tower structures, conductors, minimal widening in some areas and cooperation between rival power companies.
3. All proposed MPRP routes pose significant environmental impact, crossing tens of thousands of acres of preserved farmlands, wetlands, and forests.
4. The primary justification for this so called "reliability " project appears to be a desire to power data centers. It is far more efficient, with less environmental impact, if data centers are constructed near existing power generation facilities, and the data is then distributed to where it is needed. It is a fact that data centers do not create significant employment as they are minimally staffed.

I urge you to not approve the MPRP project. I call your attention to Sections 7-209 and 7-208 of the Maryland Public Utilities Code. In these sections you will find support for all points I have expressed above and hopefully you will find it your duty to not allow this misguided project to move forward.

Sincerely,  
Daniel Baker  
Upperco. MD

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**From:** Posie Brien  
**Sent:** Wednesday, July 31, 2024 8:56 PM  
**To:** Takahashi, Mark; Asthana, Manu; Anders, David; O'Hara, Chris  
**Subject:** Landowner Opposition to the Maryland Piedmont Reliability Project

**Mr. Mark Takahashi**  
**Chair, PJM Board of Managers**

**Mr. Manu Asthana,**  
**PJM President & CEO**

**PJM Interconnection, LLC**  
**2750 Monroe Boulevard**  
**Audubon, Pennsylvania 19403**

Dear Mr. Takahashi and Mr. Asthana:

I am writing to express vehement opposition to PJM and PSEG's Maryland Piedmont Reliability Project and the routing of a high-voltage transmission line across conserved land in Baltimore County, specifically the Piney Run Watershed Rural Legacy Area.

The southernmost route for the new line will directly bisect my family's farm, which is located just north of Mt. Zion Road, in the Piney Run Rural Legacy Area. We have been careful stewards of this property – which is **over 650 acres of contiguous conserved land** – for generations. We chose to sell our development rights and put this land in conservation because we believed — and will fight with every resource we can bring to bear — that it would be protected in perpetuity.

### **Need Has Not Been Demonstrated**

While grid reliability goals must be met, we strongly contest the level of transparency behind this project's goals as they relate to public need. PJM and PSEG have not provided adequate reasons as to the need for this project, and why this proposal would fulfill it. The project is predicated on load forecasting by PJM and PSEG that is considerably greater than that established by the Maryland PSC in its 2023 electrification study. PJM *should* have conducted a competitive procurement among transmission alternatives pursuant to FERC authorization under FERC Order 1000, but instead they used the Brandon Shores retirement (which they are procedurally required to have foreseen and planned for) to invoke an "immediate need" clause and ignore pursuit of viable competitive transmission alternatives.

### **Process Flaws**

Beginning at its inception, this W3 planning window has been ushered through with a reckless disregard for the stakeholder process. This W3 procurement is unique, proportionally huge (in cost and scope of transmission facility expansion) and, accordingly, truly unprecedented, and yet stakeholders had only 18 days to review the plan, skirting PJM's own rules of stakeholder timelines.

The public information meetings held thus far are inadequate. PSEG has provided incomplete and misleading information. PJM has skirted their own rules of stakeholder timelines. PSEG has, by its own admission on the MPRP website, threatened the use of the power of eminent domain. Eminent domain must only apply when undeniable public need is established, beyond a reasonable doubt.

Along with thousands of Maryland residents, I was made aware of this project through an article in the July 2024 issue of The Country Chronicle or by word of mouth just before the PSEG informational meetings starting on July 9, 2024. **PSEG alleges that in 2022 there were public forums yet provides no stated day, time, or location of these meetings.** Where were they, who was invited, and what effort was made to reach out to the affected public?

### **Threat to Conserved Land**

The route through the Piney Run Rural Legacy Area poses significant environmental impact,



crossing tens of thousands of acres of preserved farmlands, wetlands, and forests. It will irreparably damage two historic scenic byways which are an integral part of Maryland's tourism industry. The Piney Run Rural Legacy Area is one of the largest areas of conserved land in the state, and one of the largest contiguous blocks of easement land in the eastern United States. Not only does this proposed project compromise the existing land use rights of grantors, it will have a chilling effect on the ability of the State to enter into conservation easements in the future. Maryland has a strong vested and economic interest in protecting conserved land and this particular Rural Legacy Area is the crown jewel of the state's preservation efforts, with over \$44 million spent to protect.

### **Viable Alternatives Should Be Adopted**

Existing power transmission rights of ways can, and should, be upgraded and utilized. PSEG representatives openly misrepresented the potential for this at public information meetings by insisting that use of existing right of ways was not possible. It is entirely possible with fundamental improvements in tower structures, conductors, minimal widening in some areas and cooperation between other utility companies. Other viable alternatives exist: colocating data centers, for one. PSEG and PJM have not undergone any rigorous engineering assessment for viable alternatives with the public's knowledge or input.

PJM has violated their own terms of engagement in their lack of transparency, as well as in the speed at which this project is being pushed through without time for key stakeholders, constituents, and landowners to weigh in.

We take seriously our mandate to protect this land, and we will take every possible course of action to save it.

Sincerely,

Posie Brien  
Upperco, MD

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**From:** Todd Jones-Prettyman

**Sent:** Friday, August 2, 2024 9:32 AM

**To:** PSEG-MPRP@pseg.com; Mark.Takahaski; Asthana, Manu; Anders, David

**Cc:** piedmontcomments.psc@maryland.gov

**Subject:** PSEG Route Factor Scales are Misleading in Nature and Unreliable

Dear PSEG and PJM Board of Managers,

First - thank you for your time. I am sure you have or will receive much correspondence from concerned citizens regarding the Maryland Piedmont Reliability Project.

I hope you will be humbled by the fact that our voice is a very visceral response to actions that have a very real human impact. It has and will create a footprint of suffering - of angst, sleepless nights, sadness, and anger, among others feelings. Its imminent threat has pulled us from some of life's other cherished priorities. It has demanded our constant and ceaseless

advocacy, action, and vigilance. I hope you appreciate the time and effort on my part in an attempt to address concerns.

I and my neighborhood will be directly impacted. I hope you will read and respond to the issues I raise with this in mind. I do not write this lightly. I write it with great sincerity and with great concern, but also with great resolve. I hope you will appreciate and value us, our voice, our concerns, and our questions, knowing we will bear the brunt of the transmission lines, and be straightforward and open in any responses with us.

Before I get to the heart of the matter, I think it is important that you keep these in mind:

1. PSEG holds itself out to the public as a competent, experienced, and socially responsible developer of massive transmission projects.

PSEG has a successful history of completing large, cost-effective transmission projects that provide reliable electricity. 500kV transmission is the backbone of the electric grid that provides energy to our homes and businesses. It is not a generator but rather a means to transfer electricity via an electric “superhighway.” PSEG has an extensive transmission team that is made up of transmission planners, engineers, permitting and environmental specialists, real estate professionals, outreach professionals and more. The team works together to design and execute transmission projects, while being **socially responsible** to the communities in which they are built and maintained. PSEG brings its expertise and experience to this project.

...

PSEG has completed more than 200 transmission and substation projects, developing or upgrading nearly 600 miles of lines (emphasis added).

2. PSEG knows these routes.

Subsequent to being awarded the project in December 2023, PSEG began an **in-depth routing analysis** to further define the study area and to determine routing alternatives that would refine a viable route that considers and minimizes potential impacts to the built and natural environment (emphasis added).

3. PSEG acknowledges that stakeholder/public input is an extremely vital part of a required CPCN application.

The final route of the transmission line is subject to the Maryland Public Service Commission’s Certificate of Public Convenience and Necessity (CPCN) process. **Obtaining feedback from stakeholders and outreach meetings are an important part in this process** (emphasis added).

4. PSEG will use the survey responses, including the “route factor scales” to make future decisions.

We are in the process of reviewing all comments received to date and **further refining the routing analysis** (emphasis added).

Given those self proclamations, herein lies the rub - The “routing factor scales” within PSEG’s Stakeholder Survey are broad and ambiguous. They are misleading in nature, whether with intent or through incompetence (just poorly designed).

One does not need to reach the conclusion as to whether PSEG has been / is intentional in the misleading nature of the “route factor scales” or just poorly designed the scales. Either way - the result is the same. The scales yield bad, unreliable data.

For the scales, the stakeholder is to rate the listed route factors as either 1 - Not Important, 2 - Somewhat Important, or 3 - Very Important. *See snapshot of the route factor scales at the end of this letter.*

**A. “Minimize total length of the line (reducing the total cost)” is misleading**

This scale misleads the stakeholder as equating "length of the line" with "reducing the total cost." According to PSEG's own risk analysis of its route(s) in 12/2023, additional factors such as legal / public challenges and other factors to eminent domain, wetlands, FEMA floodplains, land preservations, historical sites, endangered/protect species can also raise the cost of the project - these would be regardless of the length of the route.

Furthermore, PSEG knows the length of the proposed routes. Here, the scales could misleadingly skew results for the shortest route (possibly already knowing its preferred route is the shortest). It would garner "support" for that route to legitimize it by (1) simply proffering the factor, and (2) bundling it with the qualifier as "reducing the total cost," which in isolation is not totally true.

"Proximity to commercial/industrial properties" or even "Proximity to environmentally sensitive areas" (easement could be cheaper in comparison to private property) could also reduce the total cost, but the scales do not qualify that. The scales misleadingly or confusingly hold out the "minimize total length of the line" factor as the only factor that will reduce total cost. By the very omission of the qualifier on other potential "reducing total cost" route factors and only adding it to the "total length" factor, the effect and representation is that only the "total length" factor reduces total cost.

Either way, whether influencing a stakeholder to equate only the length of the line with reducing total cost or having a stakeholder interpret as such and providing no safeguard (with more precise and clear language) to prevent that interpretation, yields bad, unreliable data.

Furthermore, there is no safeguard to ensure accurate data from any response to that route factor, regardless of the concerns voiced above. Simply by bundling the “minimize the length of the line” with the qualifier “reducing total cost” PSEG cannot discern whether a stakeholder responded to that route factor mainly based on minimizing the total length of the project or based on simply a desire to reduce cost.

**B. The “Parallel” and “Proximity” factors are ambiguous and misleading.**

For example, if one were to answer as a "3 - Very Important" to "Proximity to residential homes," it can either be skewed / misinterpreted as that it is very important that the lines are close to

homes, just as it can be skewed / misinterpreted as that the stakeholder is expressing that it is very important that they are not close to homes.

All of the "parallel" and "proximity" route factor scales allow for the same skewed / misinterpreted results.

This is further illustrated by the example where a farmer wants the lines off and away from any farmlands, he/she/they might answer that parallel existing infrastructure and proximity to commercial/industrial properties is "very important" as it may keep the route off farmlands. But again, due to the design of the scales - PSEG can skew to its advantage anyway it wants - whether by choice or misguided interpretation. That is the danger and concern.

On the other hand, where I live, PSEG's route runs through a parcel that abuts my home / community. The parcel was originally set aside by our developer for the public's and my community's enjoyment and walking trails as it is wetlands, forests, and green infrastructure hubs. The parcel also abuts railroads and an industrial building (Costco Distribution Facility). So, I would answer that the two proximity factors respectively as to railroads and industrial properties as "3 - Very Important" because I do not want the lines in my community. However, PSEG could skew / interpret or misinterpret this as I want them close to railroads and commercial infrastructures, thereby legitimizing placement of the lines close to my community to the Maryland Public Service Commission, and/or the public.

Again, as previously stated, the same exact response could be indicated by a farmer who does not want the lines near his/her/their farmland. Also keep in mind that the same farmer could answer the same "proximity" route factor scale as "1 - Not Important" because he/she/they do not care if it is close to commercial / industrial properties. The same intent but the farmer can answer in two drastically different ways. The scale's ambiguous language does nothing to safeguard against creating rotten, unreliable data.

So, the scale is misleading in nature and unreliable - allowing PSEG to reach any conclusion it wants to serve its purpose. In other words, the scales do not allow PSEG to reliably know whether the stakeholder's response interprets "proximity" as in favor or against the routing factor. Proximity is so ambiguous that PSEG could interpret a stakeholder as wanting it close to the routing factor, and therefore, very important, or as keeping it away from the routing factor and likewise very important.

PSEG by its own assertions knows these routes (see statement #2 from their website above). It knows where its routes cross and abut farms, railroads, commercial infrastructures, and residential communities (among other factors). It knows where there are communities, like my community in Monrovia, Maryland, where "proximity" to all these factors could be answered as "very important" - where we would certainly be expressing that the lines be away from us. It knows or should know that the ambiguity of the routing factors, how they wish to interpret my/our response, can or could undermine our intent and voice in opposition. It knows or should know it will yield contrary results or can be skewed by PSEG to yield contrary results, not intended by the stakeholder, to its own advantage.

Even for it to release and/or present results of the routing factor scales without interpretation would be misleading, knowing the inherent ambiguity infused into the scale.

For example, if PSEG asserts only the numbers, here for illustrative purposes only, such as 65% or 1000 stakeholders stated that proximity to commercial/industrial properties was "very important," it would be misleading its audience to believe that it is a statement of public support for having a route in those areas, when it knows or should know based off its own assertions and ambiguous design of its scales that that claim cannot be held out as true, as illustrated above with my community.

Let me illustrate my point. Be mindful, however, that my example provides slightly more clarity than PSEG's scales and allows for clarification to know the intent of the stakeholder. PSEG's scale offers no such assurances or safeguards.

Person #1 (a person where a proposed route abuts both residential homes and a commercial/industrial property - like where I live in Monrovia, Maryland)

PSEG: How important is the route's proximity to commercial/industrial property to you?

P1: "Very important."

PSEG: Why?

P1: "Because my home and community is close to commercial / industrial property and we do not want the transmission lines near us."

Person #2 (a farmer who does not want the transmission lines on his/her/their property)

PSEG: How important is the route's proximity to commercial/industrial property to you?

P2: "Very important."

PSEG: Why?

P2: "Because I do not want them on my farmland. I prefer the transmission lines be near commercial / industrial properties instead."

You see the problem here? Exactly the same two responses to the "Proximity to commercial/industrial properties" route factor = "3 - Very Important" that have drastically two different meanings. However, they are put into the same big bucket of "3 - Very Important" without qualification and/or clarification. The scales let PSEG control the narrative through either intentional misinterpretation or to be led astray by misguided interpretation because the data is bad and unreliable - it is rotten.

One would think that one cannot on one hand claim it "has a successful history of completing large, cost-effective transmission projects that provide reliable electricity" (PSEG's website) (therefore allegedly competent of creating stakeholder surveys and gathering reliable and accurate public input) and then on the other hand design such poorly designed scales.

It is either competent and therefore knows exactly what it is doing with its calculated "routing factor scale" or it is not competent and is unable to properly put us, the public, on notice, accurately inform us, or gather reliable stakeholder input.

It casts doubt as to its entire process and project.

It is hard to believe that a company with the resources and history of PSEG could be so incompetent in designing such ambiguous scales to gather reliable stakeholder input for such a massive project. Input that it has proclaimed as vital to inform its routing analysis.

Either way, all roads yield the same result - rotten, unreliable data.

Either way, each path yields the same impact - we cannot trust or rely upon any of PSEG's self-serving proclamations.

How about you indicate the importance to you of the following integrity factor scales. 1 - Not Important, 2 - Somewhat Important, and 3 - Very Important.

### **Intentional Misleading**

#### **Incompetence**

Oh - before you start, I'll admit that those are extremely ambiguous and misleading. You see if you answer that misleading is very important - I can say you must like lies. If you answer that it is not important - I can also say you must be fine with lying. If you answer that incompetence is very important - I can say you must be very incompetent, certainly far from expertise. If you answer that incompetence is not important - I can say you must not care very much about being competent.

But that probably wasn't your intent, right!? If you answered very important to intentionally misleading, you were probably indicating that it is important to tell the truth. If you answered very important to incompetence, you were probably indicating that it is important to be competent.

Problem is, however, you don't get to write that narrative - I do - whether I am being intentionally misleading or careless. The scales devise a scheme where I cannot reliably interpret your intent but reserve all the liberty to say I can. PSEG's scales do the same.

Even if I do not write that false narrative - the scales make it so I can.

Wouldn't make you feel comfortable, would it?

Not very socially responsible, is it?

Luckily for you, my scale goes no farther than an illustrative point. Nothing at stake.

For me - for us - the stakes are much higher.

Here, PSEG has conveniently set up the route factor scales to reserve all the freedom to write the narrative it wants under the guise that public input led the way. Creating such a veil is unconscionable, knowing the public cannot discern PSEG's intent behind closed doors - whether it implements that ploy or not.

There is no conscionable argument that PSEG can make that it should be able to use and/or represent data gleaned from the route factor scales. Rotten data breeds false narratives. It is unethical.

If being socially responsible and ethical was truly important to PSEG, then it should immediately:

1. Publicly acknowledge on its “Maryland Piedmont Reliability Project” website and in an email to every stakeholder who took the survey the unreliable nature of the route factor scales.
2. State emphatically in the same manner of communication that it will not rely on the route factor scales.
3. State emphatically in the same manner of communication that it will not make any representations of any kind based on the route factor scales to the Maryland PSC, members of the public, or other third parties, whether part of its application for a CPCN or not.
4. Cease and reverse any portion of its current route analysis and publically through the same manner of communication inform what steps it has taken and will take to ensure that information gleaned from the route factor scales will play no role in its route analysis.
5. That all the information 1 through 4 remain on its website indefinitely in a conspicuous statement(s) within the “survey” paragraph -

Subsequent to being awarded the project in December 2023, PSEG began an in-depth routing analysis to further define the study area and to determine routing alternatives that would refine a viable route that considers and minimizes potential impacts to the built and natural environment. These alternatives are presented on this MPRP website as an [interactive map](#). A stakeholder survey was available for an initial round of public comment from July 8 – July 26 5:00 p.m. EST. We are in the process of reviewing all comments received to date and further refining the routing analysis. We have added a number of FAQ questions and responses to address comments/feedback received, and are working on providing additional information and forums for public communication as soon as possible. If you have additional questions or concerns in the interim, you can contact us at [PSEG-MPRP@pseg.com](mailto:PSEG-MPRP@pseg.com).

This may not be the most convenient action for PSEG, but if it is what it says it is - socially responsible, ethical, and transparent, then it should feel compelled to do so.

I look forward to your response.

Again, thank you for your time.

Sincerely,

Todd Jones-Prettyman

***\*I am an attorney, but I am writing as a concerned and impacted Maryland citizen. These are my own opinions and advocacy. However, as in all matters, contact your respective attorney before taking any action.***

Here is a snapshot of PSEG's routing factors scale on its "[Stakeholder Survey](#)":

☐ Not affected by any transmission line proposed study corridors

☐ Other

The routing of a transmission line involves many considerations. Please select the number that corresponds to the level of importance each routing factor is to you (1 = Not Important, 2 = Somewhat Important, 3 = Very Important).

**Maintaining reliable electric service**



**Minimize total length of line (reducing the total cost)**



**Proximity to residential homes**



**Proximity to community facilities (schools, local parks, churches)**





Parallel existing infrastructure transmission/distribution lines, railroads, roads etc.)



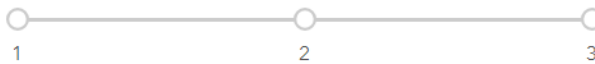
Proximity to protected species



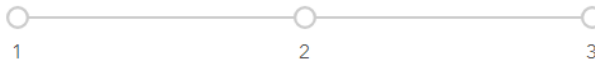
Proximity to environmentally sensitive areas, wetlands/streams, forested areas)



Proximity to historic and archaeological resources



Proximity to farmlands



Proximity to commercial/industrial properties



**From:** Jim Valerino

**Sent:** Monday, August 5, 2024 10:27 AM

**To:** Takahashi, Mark; Asthana, Manu; piedmontcomments.psc@maryland.gov; Anders, David

**Cc:** info@thelandpreservationtrust.org

**Subject:** MPRP - Jordan Sawmill Rd

To Whom It May Concern,

Please be advised that the comment section for the power line route has been closed, and the route has been modified without prior notice. Consequently, I am submitting the following comments regarding the newly proposed route, which crosses over \_\_\_\_\_.

On April 22, 2024, I underwent open-heart surgery at Cleveland Clinic and now have two implanted medical devices that could be adversely affected by the transmission lines associated with this new route. Furthermore, I own and operate a horse farm located at \_\_\_\_\_ (In Land Preservation), which adjoins the property at \_\_\_\_\_ (In land Preservation). I spend a substantial amount of time at \_\_\_\_\_ caring for the horses, and as such, the proposed route could have a significant impact on my health.

In light of these circumstances, I hereby notify you that any negative health effects that arise from the implementation of this route will be considered directly related to your firm, as well as to any entities directly or indirectly associated with the PSEG MPRP project.

Sincerely,

Jim Valerino

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**From:** Joshua Dunkin

**Sent:** Monday, August 5, 2024 12:10 PM

**To:** Anders, David; Asthana, Manu; Takahashi, Mark

**Subject:** Maryland Piedmont Reliability Project

PJM Board of Managers,

I was recently notified while abroad of a 'Transmission Line Project' whose path of destruction is proposed to cross through my property. In disbelief, I went to the website and was shocked at this disgraceful proposal. Expressed by attendees, the 'Public Information' meeting effort was a ruse. Instead of providing meaningful information and discussion, it was a muddled scene filled with misinformation, deceptions and falsehoods. According to the information on the website, the proposed project is to serve data centers outside the area and does not support public needs or reliability. Public input, as required by regulation, has not been fulfilled and I note the comments section has been removed.

In addition to an economic impact, the proposed lines will destroy significant environmental areas the State of Maryland has spent decades working to preserve including; parks, watersheds, farms, wetlands, forests, endangered species etc.

Maryland's preservation programs have been a paradigm revered throughout the United States. They include;

Maryland Agricultural Land Preservation Foundation, Maryland Department of Natural Resources, Rural Legacy Properties, Maryland Environmental Trust Properties, Land Preservation Trust, Forest Conservation Acts, etc.

For decades, these Federal and State supported programs, have successfully enabled preservation and protection of thousands of acres, therefore; the proposed lines have no place in the state of Maryland.

My property, located at \_\_\_\_\_, Parkton MD 21120, consists of approximately 30 acres of Fields, 65 acres of Forest, 4 Waterways (3 tributaries and the Third Mine Branch that flows to the Gunpowder River) a large pond, and 5 acres of wetlands. The variety of habitats support a diverse amount wildlife. from common Deer to elusive Turkeys and sought after Oriole bird sightings to endangered Bog Turtles.

It is also home to my wife, baby daughter and future retirement place for my parents (the path of destruction crosses the site where they are to build their home). We support the local agriculture and equestrian community, affording other individuals' opportunities from raising livestock to retiring horses and growing produce.

Our property also serves as a therapeutic environment for friends, family and neighbors including those with PTSD. My neighbor, Jim Valerino, who owns and operates a horse farm, recently underwent open-heart surgery and now has two implanted medical devices. He spends a significant amount of time on our property and the proposed line will be a threat to his health.

My property, among many other properties in the path of destruction, is a part of the Maryland Environmental Trust. The Trust, created pursuant to Subtitle 2 of Title 3 of the Natural Resources Article, was established to conserve, improve, stimulate, and perpetuate the aesthetic, natural, health and welfare, scenic and cultural qualities of the environment, and community.

The Conservation Easement is a perpetual easement in gross and as such it is inheritable and assignable in accordance with Article XI, runs with the land as an incorporeal interest in the Property. The purpose of this Conservation Easement is to preserve and protect in perpetuity the Conservation attributes of the Property and to prevent the use or further development of the Property in any manner that would conflict with these Conservation attributes.

*Article III. Land Use and Structures, states in part;*

*C. Commercial Uses and Activities. "Commercial" means any use or activity conducted by Grantors or a third party for the purpose of realizing a profit or other benefit to Grantors, their designees, or such third party from the exchange of goods or services by sale, barter, or trade. In instances in which the Grantors are a nonprofit corporation, Grantors may conduct only those Commercial uses or activities that are directly related to Grantors' mission. Commercial activities and uses that are permitted shall be limited in scale to those appropriate to the size and location of the Property and shall not harm the Conservation Attributes.*

*G. Access Across the Property. No right-of-way for utilities or roadways shall be granted across the Property in conjunction with any industrial, commercial, or residential use or development of an adjacent or other property not protected by this Conservation Easement without the prior written approval of both Grantees, as per Article V.B.(ii).*

Any deviation to the deed of conservation must be agreed by both the Trust and Property owner. To be clear, I vehemently oppose this project and notably deny entry and/or access to my property - exercising rights, Pursuant Maryland Law Statute, Title 6, Subtitle 4 – Trespass, in excess to rights set forth by the United States Constitution.

This despicable project fundamentally failed to follow simple procedures and does not demonstrate, qualify, nor justify, any 'public good'. Benevolent property owners, through organizations described herein, have donated property rights, in lieu of future financial gain, to preserve and protect land for future generations. Raping the countryside and essentially, robbing the graves, of those whose intentions were to preserve and protect, in pursuit of financial gain by an entity foreign to local communities and the State of Maryland as a whole, is shameful and disgusting.

The proposed transmission line will not be allowed. It is stalwartly opposed among the community and will be combatted.

Sincerely,

Joshua Dunkin  
Parkton MD

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**From:** Casey Hinder

**Sent:** Tuesday, August 6, 2024 9:16 PM

**To:** Takahashi, Mark; Asthana, Manu; Anders, David; O'Hara, Chris; Stanek, Jason

**Subject:** Maryland Easement Landowner Coalition Opposition to MPRP

Mark Takahashi  
Chair, PJM Board of Managers

Manu Asthana  
President and CEO

PJM Interconnection, L.L.C.  
2750 Monroe Boulevard  
Audubon, PA 19043

Dear Mr. Takahashi and Mr. Asthana,

We are a coalition of conservation easement landowners with property located directly on the proposed routes of the Maryland Piedmont Reliability Project, in the Piney Run Rural Legacy Area of Baltimore County. We are writing to express vehement opposition to this project.

We represent **28** separate easements and over **1,990** acres of *conserved land* in the Piney Run Rural Legacy Area that these transmission lines will transect. We have all chosen to sell our development rights in exchange for an agreement that our land would be preserved *in perpetuity*. **We will fight, with every resource that we can bring to bear**, against the desecration and dismantling of millions of dollars worth of Maryland's investment in its present and future legacy.

### **Protection of the Piney Run Rural Legacy Area**

The Piney Run Rural Legacy Area is one of the largest areas of conserved land in the state, and one of the largest contiguous blocks of easement land in the eastern United States. Not only does this proposed project compromise the existing land use rights of grantors, it will have a chilling effect on the ability of the State to enter into conservation easements in the future. Maryland has a strong vested and economic interest in protecting conserved land and this particular Rural Legacy Area is a crown jewel of the state's preservation efforts.

### **Threat to Conserved Land**

PSEG's transmission routing is taking advantage of conservation easements, and us as landowners, by targeting preserved land as a means of achieving the most cost effective route; developed land would cost PSEG exponentially more to obtain. Thus, landowners in conservation are paying for a transmission project that has no clear or demonstrable benefit to Maryland ratepayers.

### **Need Has Not Been Demonstrated for Marylanders**

The need for the project has not been sufficiently demonstrated. In fact, the word "reliability" in this case is designed to obfuscate the true purpose of the project. The Maryland PSC's December 2023 Electrification Study cites no significant increase in load forecast through 2031. This project is in support of other needs — largely, data centers in the Dominion zone — which have not been clearly or properly enumerated to stakeholders and which are *not* the responsibility of Maryland ratepayers.

According to PJM's own timeline for this 2022 Reliability Window 3, or "Data Center Alley Reliability Window", the planning process began in early 2023, months before Brandon Shores announced its plan to close. As such, this transmission project was not initiated solely as a response to violations caused by a change in Maryland public policy, nor was it proposed specifically to serve the customers whose land it will condemn and who will bear the cost through increased rates.

### **Lack of Transparency and Process Flaws**

Beginning at its inception, this W3 planning window has been ushered through with a reckless disregard for the stakeholder process. This W3 procurement is unique, proportionally huge (in cost and scope of transmission facility expansion) and, accordingly, truly unprecedented, and yet stakeholders had only 18 days to review the plan, skirting PJM's own rules of stakeholder timelines.

The public information meetings held thus far are inadequate. PSEG has provided incomplete and misleading information.

PJM has violated the principles of openness and transparency set forth in FERC Order No. 890 with regards to disclosure of information to the public.

### **Viable Alternatives Should Be Considered**

Existing power transmission rights of ways can, and should, be upgraded and utilized. PSEG representatives openly misrepresented the potential for this at public information meetings by insisting that use of existing right of ways was not possible. It is entirely possible with fundamental improvements in tower structures, conductors, minimal widening in some areas and cooperation between other utility companies. Other viable alternatives exist: colocating data centers, for one. PSEG and PJM have not undergone any rigorous engineering assessment for viable alternatives with the public's knowledge or input.

The project will mean the desecration of conserved land, protected agricultural property, and vital environmental areas, which are critical to the character of rural Maryland. In no clear way has this been shown to serve a public need for Marylanders.

*We take seriously our mandate to protect this land, and we will take every possible course of action to save it.*

Sincerely,  
**Pembroke and Charles Harwood**

**Martin E Curran Jr.**

**David Juan Ramirez**

**Vernon Hilse, Arden Farms, Inc.**

**Lynn Vonderhorst**

**Susan and Lawrence Collins**

**Dan and Julia O'Toole**

**Emma Jones and Marc Cesari**

**Dan Baker**

**Jerry and Sheila Brown**

**George and Jill Cassels-Smith**

**Linda and Ryan Fair**

**George and Clarence Mielke, Trenton Mill Farms, Inc.**

**Caryn Joachim**

**Leah Romay and Andrey Doroshenko**

**Susan Johnson Cole**

**Mark and Jean Duvall, MJBB Properties, LLC**

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**From:** Ginny Roil  
**Sent:** Monday, August 12, 2024 4:46 PM  
**To:** Anders, David  
**Subject:** MPRP

August 11, 2024

Dear Mr. Takahashi,

I am writing with grave concerns about the Industrial huge power lines proposed to run through Baltimore, Carroll and Frederick Counties.

The proposed line shows it will take out our entire forest full of wildlife and habitats, then progress over fields that have been farmed for 150 years by our family. These fields produce crops to feed animals and humans. It provides us with a small income to help with upkeep of the farm. It is a tremendous amount of work to keep up a farm but we, like others, do it because we LOVE the land, environment, wildlife, ability to grow crops and food for others and preserve the land for others to see and enjoy. These lines would destroy everything our family has worked for all these years and love.

In addition to destroying wildlife and our income from crops grown, these lines will decrease our property values. Who would want to farm or live on land that will cause cancer from the emissions from the lines? Studies from NIH report this is the effect of exposure to EMF's. It is hard to believe that PSEG, PJM and government officials would not want to prevent this exposure and risks of their constituents, especially when it can be prevented by other options. It is incomprehensible to me that PSEG and PJM would arbitrarily pick farms to bear the brunt of this project, but obviously since there is no impact to them, they don't think twice about it.

Our farmland has bald eagle nests, numerous birds, foxes, deer, and possums living on it as well as an historic barn over 150 years old. We have underground springs that pop up to the surface throughout the farmland. The Chesapeake Bay Foundation worked a few years ago on some of the land to route the underground water to the Chesapeake Bay. Since then, underground springs continue to come to the surface and provide animals and crops with water. Power lines going through this land will cause significant and widespread damage to the environment.

Lastly, we have agreed to preserve our land through the State of Maryland. This is not something we took lightly. We had to agree not only to never develop the land, as well as give up many rights such as building a house for the families of our children, never put up solar panels or windmills, and abide by other restrictions on how we use our land in the future. This is quite a commitment for families who go through this complicated process because we love the environment and land as previously stated. The state and other land trusts organizations have worked very hard to preserve the beauty of these areas and the environment. Many families, who have preserved their land and given up all their rights, now are in shock that PJM and PSEG plan to put up huge power lines

to destroy everything that we promised never to do. It is obvious that these organizations really don't care about the people, environment, and land; just their money, the easiest way to do the job and their profits.

There are several other ways to complete this task without causing devastation to hundreds of families and the land. One very promising one is using the existing lines with different larger conductors. There are several other options also, some of which are similar in costs. I implore that you hold the companies and agencies to be held accountable for looking into other options that may not pad their deep pockets as much, but are the RIGHT thing to do for all affected people, animals and the environment.

Sincerely,

Ginny Roil  
Baltimore County  
Upperco, MD

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**From:** Betsy LaBelle

**Sent:** Wednesday, August 14, 2024 2:55 PM

**To:** Anders, David

**Subject:** Stop the current proposals of the Maryland PSEG-sponsored Piedmont Reliability Project (MPRP)

 **External Email! Think before clicking links or attachments.**

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

PJM Board Secretary - David Anders,  
I express deep concern about the PSEG proposed plans to build new 500,000 V Transmission Lines through North Baltimore County (MPRP).

The plans are flawed on every level. Not only do proposed lines cross sensitive areas, such as a reservoir supplying drinking water to the City of Baltimore, but also farmland, which supplies food for the region and for international export through the Port of Baltimore. The construction and maintenance of the lines will permanently damage forest cover and watersheds with rare trout streams.

The area has a rich tradition of conservation, dating back to the 1960s with the establishment of the urban-rural demarcation line. This zoning system was



designed to create specific areas for growth, various commercial areas, and regions specifically zoned for rural conservation. In addition, landowners have voluntarily placed their properties into conservation through various programs, often supported by the State and County. The goal was to create a rural zone that protects watersheds, ensures local food supply, and fosters a rural community. A welcome byproduct and updated goal among many States is to create a connected landscape of open and conserved spaces that support wildlife habitat and migration. The Prettyboy and Loch Raven watersheds have been recognized by National Associations for their biodiversity and contributions to wildlife populations.

In a disturbing turn of events, the open spaces and conserved lands of North Baltimore County have become a target for a massive and devastating project. As a resident of Baltimore County, I urge you to consider the extensive harm that these proposals for the energy Interstate could cause. There must be a more suitable solution.

Sincerely,  
Evelyn L. Cochran –  
Reisterstown, MD

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**From:** Jennifer Small <jennifer.r.small@gmail.com>

**Sent:** Wednesday, August 14, 2024 7:09 PM

**To:** Takahashi, Mark <Mark.Takahashi@pjm.com>; Anders, David <David.Anders@pjm.com>; Asthana, Manu <Manu.Asthana@pjm.com>; jason.kalwa@pseg.com; ralph.larossa@pseg.com

**Subject:** Comments to PJM and PSEG on Maryland Piedmont Reliability Project

 **External Email! Think before clicking links or attachments.**

Contact the Support Center immediately if you click on a link or open an attachment that appears malicious.

**Date:** July 31, 2024

**To:**

**PJM Board Chair, Mark Takahashi**

**PJM Board Secretary, David Anders**

**PJM President/CEO, Manu Asthana**

**PSEG MPRP Manager, Jason Kalwa**

**PSEG CEO/Chair/President, Ralph LaRossa**

**Re: Comments to PJM and PSEG on proposed Routes for Maryland Piedmont Reliability Project**

**From: Jennifer R. Small, , Upperco, Maryland**

**Route E, J**

**Dear Mr. Takahashi,**

**Opposed to the Maryland Piedmont Reliability Project (MPRP), run by the New Jersey Company, PSEG**

Below is my objection to the planned routes put forth by PSEG and especially Route E,J, which impacts me directly. I stand with my fellow Marylanders in objecting to this plan and the devastating impact it will have across the region. I reserve the right to further supplement these comments before the PSEG and to further supplement the record before the Public Energy Commission, should an application be filed.

As a lifelong Baltimore County landowner, homeowner and voter, **I am strongly opposed to the Maryland Piedmont Reliability Project (MPRP), run by the New Jersey Company, PSEG.**

I continue to voice my opposition to this potential land grab that will not benefit our community while devastating our businesses, farms, wildlife, conservation areas, Pretty Boy and Gunpowder State Parks, endangered species, and property values. It will destroy forever our beautiful land as our conserved and farm lands are seemingly targeted by PSEG.

The MPRP was poorly and secretly planned as we have been blindsided! I am shocked and dismayed as the MPRP PATHWAY will destroy farms, livelihoods and a lifetime of savings in home values. This is a disaster for us all! The overhead transmission manner of delivery is outdated and isn't a viable solution.

My farm that I have worked so hard for is right in the PATHWAY of this destructive MPRP project. Families, such as myself will suffer financially. Our property values will be severely affected up to 50% -65% values loss, and I will never recover financially from this disaster. The MPRP is heart-breaking, and financial ruin for all!

On my farm property and home, I have two businesses, including a Thoroughbred Horse breeding and racing farm business, that will be severely impacted by this project. I bred and

raised the 1984 Olympic Gold Medal Champion, Touch of Class, here in Upperco, including other Champions Crocodile Fears.

My farm property is within the Land Preservation Trust and Piney Run Rural Legacy areas of Baltimore County. My property has environmentally sensitive areas including forest buffers, forest conservation, reforestation conservation, endangered species including Bog Turtles and American Bald Eagles. There are various animal species including mink, skunks, bear, foxes, possum, deer, and birds such as the Herons, and blue birds, currently nesting in nearby farms.

Additionally, I have reforested and planted over 400 trees including native Maryland trees species.

My farm property is located within walking distance of the historical town of Trenton, and documented Native American archaeological sites.

The Piney Branch Golf Course, Trenton Mill Road is contiguous with my property. The MPRP PATHWAY that runs across my property, is less than 120 feet from Piney Branch Golf Course. Additionally, community facilities such as Clubhouse, Wedding Venues are within 1,000 feet of transmission right-of-way.

Further, I oppose this project as there are numerous criteria that should be considered concerning in the E, J Route and all Maryland Routes affected by the MPRP PATHWAY transmission right of way;

### **Environmental Impact**

- **Habitat Destruction:** Building transmission lines can lead to the destruction of natural habitats, affecting local wildlife and plant species. We have numerous Bog Turtle Habitats, Biodiverse communities,
- **Chesapeake Bay Watershed:** Maryland's Watershed including the Gunpowder, Pretty Boy and Piney Run Rural Legacy Watersheds will be severely affected and permanently damaged by the destructive MPRP.
- **Deforestation:** Clearing land for transmission lines involves cutting down trees, leading to deforestation and loss of biodiversity. I have planted over 400 trees on my property which will be clear cut and destroyed.
- **Forest Conservation:** Large tracts of forests conservation and reforestation land have been conserved. MPRP will clear cut and destroy these beautiful tracts of conserved forests.
- **Soil Erosion:** The construction and maintenance of transmission lines can lead to soil erosion, negatively impacting local agriculture and waterways. The bulldozing and destruction will destroy my wetlands and springs on my property. The site will wash into the Piney Run and Piney Branch Streams and Watersheds.
- **Endangered and Protected Species:** Areas with protected species are in the transmission right of way, including Bog Turtles and American Eagle Habitat nests.

- **Negative Environment Impact:** All of the routes, including Route E,J, bisects the sensitive and vital watershed area of the Piney Branch and its many spring heads and streams (and protective forest) that feed the watershed all the way to Baltimore City. and Piney Branch Water Shed area along Trenton Mill Rd, Trenton Church to the Piney Branch Golf Course numerous ponds and other nearby ponds. These birds in search of food and habitat, will have to cross your 500-volt power lines that will separate these important food sources.
- **Piney Run Watershed:** Transmission route follows close to and parallel to the Piney Branch, until finally crossing over and beginning to turn back to the north east an area that all forms of life will cross in search of food and habitat.
- **Transmission Easement** will cause the clear cutting of significant forest stream buffers further degrading the sensitive Water Shed area in areas designated as biodiverse by the State of Maryland.
- **Negative Environmental Impact on Chesapeake Bay Watershed, Pretty Boy Reservoir and Gunpowder State Park and River.**

### **Land Use Criteria**

- **Conservation:** Multiple conservation lands including Rural Legacy, Maryland/Baltimore County Agricultural Land Foundation Preservation Trust, and Maryland Environmental Trust, are crossed by or within 500 feet of transmission right-of-way.
- **Conservation land:** in the immediate area around my property, which comprises the first few miles of the Route E, J, (Rte 30, Trenton, Trenton Mill, Trenton Rd., Trenton Church, Black Rock) approximately 80 percent of the targeted properties comprise land held in conservation.
- **Farms:** The proposed Route E, J crosses conservation lands including farmland, older woodland, and sensitive watershed areas. The land easement process aims for contiguous properties, and therefore most neighboring properties are also held in conservation.
- **Multiple businesses** including my own businesses are within 500 feet of transmission. The Piney Branch Golf Course is within 200 feet of transmission.
- **Recreational:** Areas including Piney Branch Golf Course are within 200 feet of transmission.
- **Cultivated cropland and pastureland** is within the transmission right of way. This has a negative
- **Communication Cell Towers** are located close to transmission.

### **Health Concerns**

- Electromagnetic Fields (EMFs): Prolonged exposure to EMFs from high-voltage power lines has raised concerns about potential health risks, including an increased risk of cancer and other health (both physical and mental health) issues. This is a health risk to me, my children and grandchildren.
- Noise Pollution: Transmission lines produce a constant hum, contributing to noise pollution which can affect the quality of life for nearby residents. This will be a constant issue to me and my neighbors as the constant noise will affect our lives, hearing and health. Spraying under the transmission lines will affect my health, forests, plants, wildlife as various weed killers are noted to cause cancer.
- Fire hazards: As high voltage power are very hot, and as our climate becomes hotter and unstable, increasingly hotter.
- Hurricane and Tornado Risk: Transmission Lines subject to high risk winds.

### **Aesthetic and Property Value**

- Visual Pollution: Transmission lines are often considered unsightly and can significantly alter the landscape, detracting from the natural beauty of an area. The 500kv transmission lines are massive, requires a clearcut corridor for access and roads for access. The towers are high, ugly, and create a huge footprint.
- Residence: My home will be uninhabitable as the transmission lines go right to my home, farm, and barns.
- Property Devaluation: The presence of transmission lines will lower property values, making it harder for homeowners to sell their properties and negatively impact community wealth. MPRP will devalue my property and home vales as much as 50% which is financially ruinous to me.
- The Scenic Horse and Hound Byways areas: Black Rock Road and Dover/Trenton Roads, which will be impacted.
- Historical Districts and Cultural sites will be destroyed by MPRP.
- Maryland Cycling Race 2023: This event was held in our area, showcasing Baltimore County's conserved land. Our beautiful Baltimore County lands were featured and admired on national televised coverage. The transmission towers will destroy the beauty of our lands.
- Maryland Public Television (MPT) the Nationally viewed Motor Week: Any day of the week, and you will see the latest test-driven car heading down Trenton Mill Rd, Dark Hollow and Trenton Roads. The transmission towers will destroy the beauty of our lands.
- Privacy: loss of privacy when trees cut down. The corridor will require a massive clearcut corridor, roads for access, creating loss of privacy and an ugly landscape with no trees. I have planted more than 400 trees on my property. My property has environmentally sensitive areas including forest buffers, forest conservation, reforestation conservation.

## Social Criteria

- Historical: At the start of Route E, J, your transmission lines run towards Trenton Mill, and go directly by a historical designated site Rippling Run with Native American Rock Shelters and sites with artifacts throughout the area.
- Watershed: The Piney Branch Watershed Valley along Trenton Mill (including its feeder streams to the west) is the source of numerous Native American artifacts.
- The Power line easement will than directly pass over the original Zouck's Stone Mill from early 1800 with the remnants of the original dam and the restored Mill House on Trenton Mill and Trenton Road.
- The Transmission lines PATHWAY lines are within the 5 historical houses and the once General Store in the small town of Trenton. As the town is built going up the hill from the intersection of Trenton and Trenton Mill, the residents will likely be eye level with power lines on your 100-foot towers.
- Historical Town of Trenton: This historic town is in the bullseye target of MPRP. There are multiple residential buildings including my home within 200 feet of or within 500 of transmission right of way.
- There are numerous Native American archaeological sites in the area including Rippling Run Farm on Trenton Mill Road, Upperco.
- Maryland Historical Trust: There are multiple historical buildings in the town of Trenton, and throughout the Upperco area, and listed Maryland Historic Trust in the routes.
- Public Facilities: State Parks, private parks, are in proposed routes.
- Airports: Westminster Airport is in the proposed route.
- Schools, Colleges, Churches and Senior Centers are in proposed routes.
- Trenton Christ Lutheran Church :On Trenton Church and Trenton Roads is the historical Trenton Christ Lutheran Church, and Cemetery over which the Transmission lines are projected. and two more historical designated houses. There are several more Maryland Historical Trust historical homes within the proposed Transmission line route including family grave sites.
- Recreation, Parks, Public and Private: Numerous facilities are in the proposed routes including Gunpowder State Park, Piney Branch Golf Course and Westminster Golf Courses.

## Farms

- Farms: The Transmission R-O-W cuts through Maryland's prime farmland including wineries, vegetable, croplands, livestock, tree nurseries, landscape, fruit growers, and horse farms and riding centers including those offering horsemanship for therapeutic, handicapped, veterans, and children from underserved communities.
- Loss of Farm Businesses: Due to the noise and destruction caused by the transmission lines, raising horses, cattle, and various livestock will be too harmful to

livestock and impossible. Farms will be unable to continue to function if the Transmission lines cut farms in half. PSEG will spray ROWs with toxic weed killers, impacting Organic Farms and community health.

- Equine Facilities, Thoroughbred Breeding and Training Farms, and Therapeutic Riding Centers: MPRP will impact many facilities including Therapeutic Riding Centers and City Kids Facilities, Dark Hollow and Safely Kept Thoroughbred Horse Farms are located within the area of the Transmission line, which has bred and raced Eclipse winners, champions and extremely valuable thoroughbreds, Dark Hollow Farm.

### **Safety Risks**

- Fire Hazards: High-voltage lines can be a fire hazard, especially in areas prone to wildfires. Downed lines can spark fires that endanger lives and property.
- Structural Failures: Towers and lines are susceptible to damage from storms, earthquakes, and other natural disasters, posing a risk to nearby communities. We are in an area prone to violent wind storms such as tornadoes and derechos storms. Last year our community was devastated by tornadoes, derechos, and other violent storms.

### **Economic Concerns**

- High Costs: The construction and maintenance of transmission lines are expensive, and these costs are often passed on to consumers through higher electricity rates. We should not have to bear the burden of the cost of the MPRP. The benefit is for the Virginia and Fredrick Data Centers. According to studies, Maryland does not need additional electrical transmission.

### **Legal and Ethical Issues**

- Land Rights: Construction will require acquiring land which infringes on the rights of landowners and could lead to lengthy legal battles. Our community is in
- Community Opposition: our community overwhelmingly opposes this transmission line project, citing the above concerns and advocating for a less intrusive solution. We oppose the MPRP as destructive for our community.

### **Better and More Efficient Alternatives to MPRP**

- Reconductoring: There are better ways to deliver electricity rather than the destructive and heart-breaking destruction of Marylander's beautiful homes, communities, farms, forests, state parks and homelands. Lower capital investment.
- Advanced Technology: More cost effective and less destructive ways other than MPRP.
- Existing Pathways: Less costly and less destructive.

The MPRP is for the benefit of Data Centers in Northern VA, only and will be paid by Maryland electricity rate payers. The Office of Peoples Council has raised opposition to MPRP.

Further, there was hardly any notice given to the people this project could affect. Most people have found out by word of mouth. I didn't know about MPRP and was blindsided!

The so-called PSEG information outreach meetings July 9, 11, 12, presented lots of misinformation, misleading, inept, and confusing data with no factual basis. People stood outside the building as PSEG wouldn't let many people in the building.

Threats of eminent domain and condemnation are used against property owners and listed in the information language on the PSEG website and presentations.

Maryland and Baltimore County is such a special place to live, work and visit, what a shame to lose it! It is the heart and lungs of Maryland.

We note that PSEG is going to run this through as quickly as possible and promises a September decision on its route and a November application.

**We will have courage and unwavering support to STOP MPRP's destruction and heart breaking project.**

Thank you,

Jennifer

Jennifer R. Small

Upperco, MD

**E, J Route**

---

From: avaoelke@qis.net

Sent: Thursday, August 15, 2024 1:27 PM

To: piedmontcomments.psc@maryland.gov; Takahashi, Mark; Anders, David; Asthana, Manu; @pseg.com; @pseg.com; @senate.state.md.us; @house.state.md.us; @house.state.md.us; @baltimorecountymd.gov; @baltimorecountymd.gov; @baltimorecountymd.gov; @vanhollen.senate.gov; office@thelandpreservationtrust.org

Subject: Please stop MPRP!

To Whom it May Concern,

I am a lifelong Marylander. I have lived in Northern Baltimore County for 32 years. I am a grandmother, an Artist and environmentalist. I was drawn to this area because of its rural character and beauty, and because of its strict zoning and underdeveloped farmland. A power line running through Upperco would destroy the most beautiful rural part of this country.

Why not pave paradise and put up a parking lot? Is there nothing sacred? I am outraged that there is such blatant disregard of the value of the beauty that this lovely area of the world holds. There aren't many places that compare. We must not allow its desecration.



Future generations need us to hold on to this open space so that they can behold its relatively undisturbed beauty. We have to make this area a National Historic treasure and preserve it as is for future generations.

Let's look at the word "Reliability" that is in the name of this offensive project. What? So these power companies can rely on making a lot of MONEY? So these data centers can inform AI so it has enough information to make being a human OBSOLETE?

I sincerely hope that our grandchildren's interests are protected from the insanity of greedy shortsightedness, lack of wisdom and indecent destruction of this beautiful area of the world.

Please stop MPRP!

Thank you,  
A. Oelke  
Upperco MD

---

**From:** NANCY ROBERTS

**Sent:** Thursday, August 15, 2024 6:51 PM

**To:** piedmontcomments.psc@maryland.gov; @maryland.gov; Takahashi, Mark; Anders, David; Asthana, Manu; @pseg.com; @pseg.com

**Subject:** Go back to the drawing board on MPRP

To whom it may concern,

I write to express deep concern about the PSEG proposed plans to build new 500,000 V Transmission Lines through North Baltimore County (MPRP).

On every level the plans are flawed. Not only do proposed lines cross sensitive areas such as a reservoir supplying drinking water to the City of Baltimore, but also farmland which supplies food for the region and for international export through the Port of Baltimore. Forest cover and watersheds with rare trout streams will be permanently damaged by the construction and maintenance of the lines.

As a landowner with property protected by a Maryland Environmental Trust Easement, I find the situation regarding the PSEG -MPRP proposals to build high voltage transmission lines across North Baltimore County, and on through Carroll and Frederick Counties to a sub-station near the Potomac River to be completely unacceptable. The state of Maryland and its residents have worked for decades to preserve prime productive farmlands and open space in conservation easements for

the future. This cannot be thrown out the window, to get power from PA to Virginia. The entire character to the state of Maryland is at stake if we make conservation easements meaningless by approving this plan as it has been envisioned

The area has a long tradition of conservation, dating back to the 1960s with the creation of the urban rural demarcation line (urdl). Zoning creates specific areas for growth, for various commercial areas, and for regions zoned specifically for rural conservation. As an additional layer of protection, landowners have voluntarily placed their properties into conservation through a variety of programs supported and often paid for by the State and County. The intent was to create a rural zone which protects watersheds while ensuring local food supply and a rural community. A welcome by product and updated goal among many States is to create a connected landscape of open and conserved spaces which support wildlife habitat and migration. The Prettyboy and Loch Raven watersheds have been recognized by National Associations for their biodiversity and contributions to wildlife populations.

In a perverse twist, the open spaces and conserved lands of North Baltimore County have become an open invitation to encroachment on a tremendous and devastating scale. As a resident of Baltimore County, I implore you to consider the harm done on so many levels by proposals to build this energy Interstate. There must be a better solution.

Sincerely,

Nancy Roberts  
Sparks, MD

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LPT LAND PRESERVATION TRUST

13501 Falls Road  
Cockeysville, Maryland 21030

BALTIMORE MD 212

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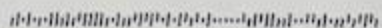


David Anders  
PJM Board Secretary  
2750 Monroe Boulevard  
Audubon, PA 19403

CT-2-5876

RE: Maryland Piedmont Reliability Project

19403-242950





LPT LAND PRESERVATION TRUST

11501 Falls Road  
Cockeysville, Maryland 21030

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August 5, 2024

Ms. Tamara L. Linde, Executive Vice President and General Counsel  
Mr. Jim Gilroy, State Government Affairs  
Mr. Jason Kalwa, MPRP Project Manager  
Public Service Enterprise Group Incorporated  
80 Park Plaza  
Newark, New Jersey 07102

Re: Maryland Piedmont Reliability Project (MPRP) Proposed Construction Through Conserved Properties

Dear Ms. Linde, Mr. Gilroy and Mr. Kalwa:

On behalf of the Land Preservation Trust, Inc. (LPT), we are writing to oppose the construction of the proposed Maryland Piedmont Reliability Project (MPRP) through conserved properties.

The State of Maryland has determined that preserving agricultural and open land in perpetuity is a compelling public interest and has devoted significant resources to protecting its agricultural and open land. Maryland established a state-wide Rural Legacy Program and designated the Piney Run Watershed Rural Legacy Area (Piney Run RLA) in northwestern Baltimore County as one of the targeted areas for preservation under this program. To date, the Piney Run RLA is the most successful conservation area in Maryland and has received more than \$47 million in funding from the State and Baltimore County, protecting an area with over 22,000 contiguous acres. The Maryland Environmental Trust protects another 17,000 acres in Baltimore County, more than in any other Maryland County. In 1986, the LPT was formed to accept permanent voluntary conservation easements and currently holds 380 easements on over 13,400 acres (some of which are co-held with the State and County conservation programs mentioned above).

Perpetual conservation easements have allowed the State of Maryland and Baltimore County to preserve forever vast amounts of contiguous land for an important public purpose, without having to purchase the land outright. Conserved land contributes to Maryland's important rural economy and lifestyle, ensures a regional supply of food for people and livestock and filters water for the 1.8 million consumers whose water comes from the watershed's reservoirs.

Ms. Tamara L. Lunde, Executive Vice President and General Counsel

Mr. Jim Gilroy, State Government Affairs

Mr. Jason Kahwa, MPRP Project Manager

Public Service Enterprise Group Incorporated

August 5, 2024

Page 2

PSEG's MPRP proposal includes as an option the construction of a new "greenfield" route through the heart of the Piney Run RLA, designated as Routes E, 1, as well as an option through the west end of the Piney Run RLA, the southern end of the route designated as Routes D, 1. The properties directly affected by these proposed routes are conserved by easements that are held by the Maryland Department of Natural Resources, the Maryland Environmental Trust, the Maryland Land Preservation Foundation, Baltimore County, and LPT. The conservation values protected by these easements would be severely damaged by the construction and maintenance of the MPRP.

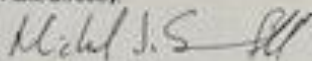
The Piney Run RLA is laced with trout streams and endangered species habitat, is in the heart of the Maryland Scenic By-Ways, is rich in prime soils and forest cover, and is home to "Century" farming families and historic structures and places. In short, the Piney Run RLA epitomizes the promises and goals of public / private conservation.

Maryland purchased conservation easements on land in the Piney Run RLA to assure that the land continues to be used in its highest and best use as agricultural and open land, not to allow conserved properties to be targeted for infrastructure projects.

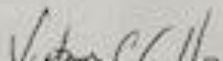
LPT takes very seriously its obligation to defend the conservation values protected by the requirements of the conservation easements it holds. To be clear: the construction of a new "greenfield" transmission line across conserved land is prohibited by the terms of the conservation easements. Accordingly, LPT could not agree to amend its conservation easements to allow the construction of a transmission line and would require a court to determine that there is a compelling public need for a new transmission line that outweighs the public benefit protected by the conservation easements.

We ask that PSEG and PJM work with us to identify existing infrastructure that can be used to add the additional transmission capacity that PJM has determined is needed. A new "greenfield" transmission line must not be built through the heart of Maryland's north Baltimore County farms and the Piney Run RLA. Conserved farms should be the last places used for infrastructure projects such as the MPRP.

We welcome the opportunity to speak with you in the near future. Please contact us at [easements@TheLandPreservationTrust.org](mailto:easements@TheLandPreservationTrust.org) at your earliest convenience to arrange a time we can talk directly.



Michael J. Sonnenfeld  
Easement Chair  
Land Preservation Trust, Inc.



Victoria C. Collins  
President  
Land Preservation Trust, Inc.