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February 2, 2026

The PJM Board of Managers
PJM Interconnection, LLC
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RE: Comments on Proposal 237, 2025 RTEP Window 1 MAAC Regional Cluster Competitive Solution 2025-W1-237

PJM Board of Managers,

The Nature Conservancy in Pennsylvania (TNC) has conserved or assisted in the conservation of over 100,000 acres of Pennsylvania wildland. Our conservation priorities focus on protecting lands that maintain critical wildlife corridors and provide refuge in the face of a changing climate. We plan our conservation actions based on climate change, but we also approach our mission with the awareness that we must drastically reduce the emissions that cause it. We are determined to see a clean energy future come to fruition, as it is essential to achieve emissions reductions while meeting people's affordable energy needs. We understand and agree, therefore, that there is a great need to develop transmission projects that integrate clean energy resources to reduce pollution and improve the affordability and reliability of electricity for our communities. We are increasingly engaged in the transmission discussions across the U.S., and, in our experience, well-planned transmission projects should satisfy the following criteria before approval:

- Demonstrably contributing to meeting demand and shared affordability and reliability goals.
- Developed using the least-cost and lowest-impact approaches by, for example, first using existing Rights-of-Way ("ROW") and available upgrades to existing transmission infrastructure.
- Utilizing best available science to avoid impacts to resilient, connected, and natural lands.
- Prioritizing the connection and integration of clean and renewable energy resources that promise to share the benefits of negative pricing across the grid's ratepayer base while also supporting PJM states' decarbonization and energy system affordability and reliability goals.
- Providing transparent and iterative public engagement opportunities to inform needs assessments and ultimately project designs that fully consider biodiversity and community impacts.

The Nature Conservancy is acutely aware that, after all efforts to avoid impacts on nature and communities have been maximized, the need to develop large-scale energy infrastructure, including transmission, may require consideration of other options to minimize and/or mitigate these impacts.

It is with these perspectives that we offer the following concerns regarding Proposal 237 contained in the 2025 RTEP Window.

The Constructability Analysis for Proposal 237 underestimates the ROW/Land Acquisition risk it has assigned to the proposal and, as a result, the completion timeline and cost.

The Constructability Analysis for Proposal 237 describes one of the largest new transmission projects in Pennsylvania in recent memory. The analysis states a need to secure over 5300 acres of linear land in locations that contain critical climate migration corridors across western Pennsylvania and the Allegheny Mountains, Central Ridges of Pennsylvania and the Kittatinny Ridges. Only a minority (20%) of the proposed development would utilize existing ROW. The analysis assumes a correlation between rural community classification and lower risk/lower opposition and describes higher risk in areas where populations are denser, assigning an overall "ROW/Land Acquisition Risk" of "Medium-High".[1]

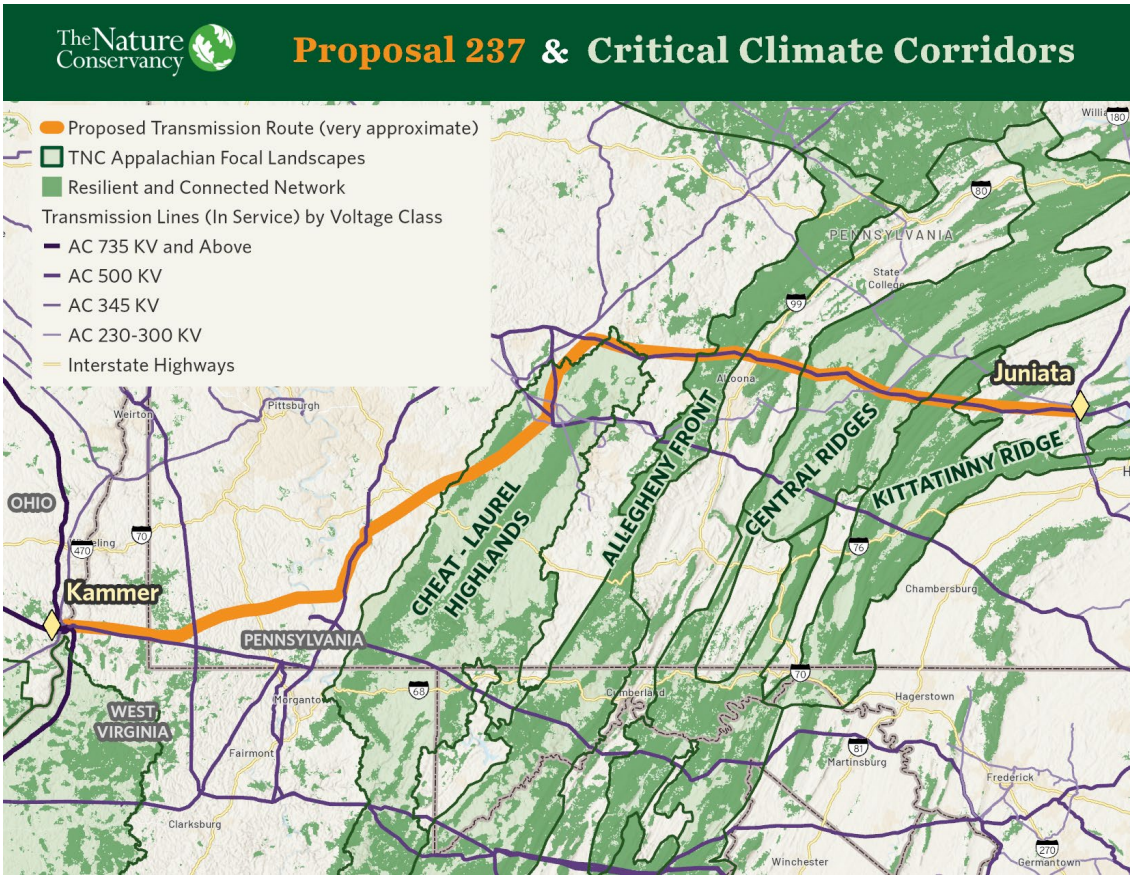
Given the scale of the proposal, its reliance on new greenfield development, and the assumptions contained in the analysis, the Constructability Analysis is likely underestimating its ROW risk for Proposal 237 and, as a result, the completion timeline and cost. Infrastructure and energy projects, as well as private developments of all types, now face robust public scrutiny in both rural and more densely populated communities. Communities are well equipped to organize local opposition through social media, pressure local leaders to oppose new projects during zoning, and often demand a clear accounting of local benefits and liabilities from proposed projects.

In proposing to obtain land along 220 miles in Pennsylvania, legal challenges, protracted proceedings, and a litany of other issues are sure to emerge. It is appropriate to question if the estimated timeline and the "Medium-to-High" risk score assigned to the proposal are realistic assessments.

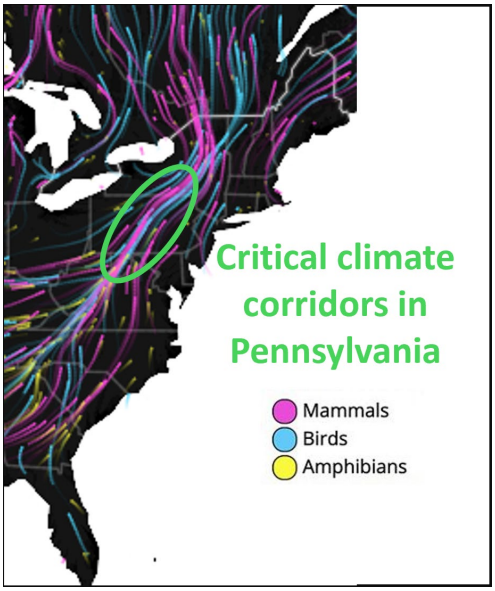
Proposal 237 does not use best available science to apply the mitigation hierarchy and to avoid impacts to resilient, connected, and natural lands.

Proposal 237, without additional co-location, would likely create significant impacts to critical climate migration corridors in Pennsylvania that will be difficult to offset. The proposed route traverses most of the north-to-south ridgelines that serve as habitat bridges and migration pathways from the southern Appalachians to the northern Appalachians (see embedded Maps 1 and 2 below).

[1] The Constructability Analysis states *"Overall, Medium-High ROW/Land Acquisition risks are assessed for this proposal due to the combination of greenfield and paralleling existing ROW for the 765 kV line routes*." Page 168 https://www.pjm.com/-/media/DotCom/committees-groups/committees/teac/2026/20260106/20260106-2025-rtep-window-1-constructability-and-cost-analysis-report.pdf



Map 1. This map depicts an approximation of the proposed route overlaid with Appalachian Focal Landscapes, high priority areas for conserving the Resilient and Connected Network (RCN). The RCN is a conservation network of climate-resilient sites designed to sustain biodiversity and ecological functions into the future under a changing climate. The network was identified and mapped over a 10-year period by Nature Conservancy scientists using public data available at the state and national scale, and an inclusive process that involved over 150 scientists from agencies, academia and NGOs across the United States.



Map 2. This Migrations in Motion map show the average direction that mammals, birds, and amphibians need to move to find hospitable climates as they shift across the landscape and adapt to the changing climate. Pennsylvania is a keystone of critical climate corridors at a continental scale. The dynamic map is available at https://www.maps.tnc.org/migrations-in-motion/. © Dan Majka / TNC

TNC strongly advocates for the sequential and iterative application of the mitigation hierarchy for all major energy infrastructure projects, especially for Project 237, given its significant impact on critical climate corridors in Pennsylvania, as shown. Earnest application of this hierarchy requires the project developer and PJM to use evidence-based best practices across the full project cycle—from pre-feasibility planning to decommissioning – to deliver No Net Loss (NNL) to priority habitats and species at the project level. The so-called mitigation hierarchy, as it is globally known, provides the fundamental framework for energy projects to mitigate biodiversity loss and is a common requirement in permitting. [2]

The first and most important step in applying the mitigation hierarchy is to avoid impacts on priority habitat features and species and is best achieved in the siting and subsequently in the initial design phase (avoiding sensitive habitat, selecting materials and technologies) for project development. Where impacts cannot be avoided, the next step is to restore habitats and species through compensatory restoration and offsetting actions. These actions can only be approved after all steps to achieve NNL have been taken.

We urge reconsideration of Proposal 237 to ensure that, as we plan to meet future energy demands, we do so with consideration for biodiversity and nature at the outset of project development. Making these considerations at the earliest stages of project development is the only way to avoid impacts on priority habitats and resources and to minimize the fragmentation of connected landscapes and these critically important places.

Proposal 237 has not been evaluated through a transparent and iterative public engagement process.

TNC is highly motivated to assist the PJM and transmission developers in meeting the energy and cost challenges of our time. To meaningfully assist, we need opportunities to provide science and siting information, and to provide other related input at the earliest possible stages of development.

We highlight concerns raised by the Pennsylvania Public Utility Commission (PUC) and the Pennsylvania Office of Consumer Advocate (PA OCA), who have formally communicated to the PJM Board of Managers and PJM Planning Department about the speed and process used to advance this proposal, as well as the justification based on a load growth projection that may be reevaluated in the future.[3] While these commenters emphasize potential shortcomings in evaluating cost-effective alternatives—a concern we share—we also point out that these issues overlap with broader landscape-scale impacts and solutions. Applying a mitigation hierarchy could not only address these impacts and reinforce the need for alternatives but may also point to pathways that reduce costs and public opposition.

[2] Internation Union for the Conservation of Nature (IUCN), Mitigation Hierarchy Fact Sheet. https://iucn.org/sites/default/files/2025-12/ecosystems-in-the-mitigation-hierarchy.pdf

[3] PA OCA https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2026/20260121-pa-oca-letter-re-rtep-project-237.pdf PA PUC https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2026/20260127-papuc-letter-re-2025-rtep-window-1-maac-regional-cluster-competitive-solution-2025-w1-237.pdf

For Proposal 237, we encourage robust, transparent, science-based reassessment of the proposed route. Ideally, proposed transmission routes will maximize co-location with existing ROWs, particularly along route segments parallel to existing lines. In addition, we encourage efforts to incorporate new approaches to reduce land-use impacts, including, but not limited to, co-locating with existing transportation ROW, reconductoring existing infrastructure, and rerouting to maximize the use of degraded lands along the pathway.

We are grateful to the PJM Board of Managers for your attention to the perspective offered in this communication. We strongly believe that the criteria we have set forth will only hasten the deployment of clean energy solutions and ultimately result in better outcomes for nature and climate while meeting the affordable energy needs of people.

Sincerely,

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