

OPPOSE
Economic Matters
2/21/2025

House Bill 1224 – Forest Conservation Act - Linear Projects - Alteration

Baltimore Gas and Electric Company (BGE) opposes *House Bill 1224*, which updates the definition of "linear project" under the Forest Conservation Act (FCA) to exclude new transmission or distribution lines constructed on or after October 1, 2025.

The Maryland Forest Conservation Act (FCA), enacted in 1991, is a crucial piece of legislation aimed at minimizing the loss of Maryland's forest resources during land development. The FCA integrates the identification and protection of forests and other sensitive areas into the site planning process. While the Maryland Department of Natural Resources Forest Service administers the FCA, its implementation is carried out at the local level, providing local jurisdictions with maximum flexibility in applying the FCA.

Under the current law, linear projects that do not involve cutting, clearing, or grading more than 20,000 square feet of forest are exempt from the FCA's requirements. Utilities, including water, telecommunication, gas, and electric, often need to clear forestry for various projects multiple times per year, and an exemption was granted for this purpose. However, *House Bill 1224* changes this by excluding transmission or distribution line construction from the definition of linear projects. This change would make it more difficult for these projects to proceed due to increased local permitting requirements.

BGE cautions against making changes that would create significant barriers to ongoing transmission projects, which are essential for addressing resource adequacy challenges in the region. If passed, the bill would jeopardize critical projects like the Brandon Shores Remediation Transmission line. This PJM-directed project is necessitated by the closure of the Brandon Shore generating plant, which will take 1300MW of capacity offline upon retirement. Projects like Brandon Shores are essential to maintaining reliable electric delivery to central Maryland.

BGE strongly emphasizes that this legislation would significantly complicate the construction and enhancement of infrastructure, especially during a period of growing imbalance between electricity supply and demand. This imbalance is driven by increased electrification, the

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rapid retirement of thermal generators, and challenges in bringing new power resources online.

For these reasons, BGE strongly requests an unfavorable Committee report on *House Bill 1224*.

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