



February 18, 2025

Economic Matters Committee  
House Office Building, Room 231  
6 Bladen St.  
Annapolis, MD 21401

To the Maryland House Economic Matters Committee:

On behalf of Scenic America, the nation's only 501(c)(3) nonprofit organization dedicated to preserving and protecting our country's scenic beauty, I am writing to express our strong support for Maryland House Bill 0645, which strengthens local planning and reporting requirements for transmission line siting. This bill represents an important step toward ensuring that the planning of electric systems balances infrastructure needs with protecting Maryland's scenic, historical, and environmental resources.

Scenic America advocates for policies that preserve scenic beauty and prevent visual blight not only for economic growth, but also to uphold the right of all individuals to live, work, and play in a visually appealing environment. Scenic America therefore endorses the undergrounding of overhead transmission wires and energy infrastructure for its ability to increase resiliency in the face of extreme weather and reliably deliver power equally across communities while preserving landscapes and community character. Scenic America applauds Delegate Guyton's introduction of House Bill 0645 to modernize Maryland's electrical infrastructure by promoting alternatives to new overhead transmission lines.

This bill is particularly relevant given the opposition from countless communities and citizens to the Piedmont Reliability Project. The proposed transmission lines will run through Frederick, Carroll, and Baltimore Counties. These three counties have expressed vehement opposition to the construction of the transmission line. Baltimore County recently announced a petition to intervene in the Public Service Commission's consideration of the project. The three counties share concerns about intrusion into environmentally sensitive areas, property owner rights, and permitting authority. Frederick County is concerned with protecting farmlands that are businesses and homes for its residents. The respective county governments have urged residents to stay up to date with the project's review process and to submit concerns about the Piedmont Reliability Project.

Particularly, in the case of Baltimore County, a case for scenic conservation and protection was identified when PSEG found that the project would have significant impact on easements from the Baltimore County Agricultural Land Preservation Program, including forest buffers and conservation easements. These lands were written in a deed agreement to protect features of the

land for its farmland, natural resources, and scenic views. However, with the Piedmont Reliability Project's proposed overhead line, visual blight would be introduced into these conservation areas, interrupting the land's natural state and beauty. In the case of the Piedmont Reliability Project, undergrounding provides a practical solution to address community concerns, protect sensitive areas, and respect property rights while addressing the growing energy needs of the state.

Despite the common belief that transmission lines are too expensive to underground, undergrounding transmission lines can prove to be a cost-effective method for electrical infrastructure. Although upfront costs may be higher than those of overhead line construction, underground lines require less maintenance and are more resilient through weather events, reducing long-term costs. Underground transmission lines likewise offer long-term savings through reduced vegetation management, lower operations and maintenance expenses, and increased resilience to climate disasters and wildfires.

From a construction standpoint, undergrounding within rights-of-way (ROWs) provides a key economic advantage by speeding up permitting, therefore reducing project timelines and costs. Additionally, because these areas are already considered environmentally disturbed areas, undergrounding in the ROW makes these projects exempt from arduous environmental assessments—reducing time, resources, and costs. Lastly, undergrounding in the ROW does not require the implementation of eminent domain, leading to less public opposition—an issue that has defined the current state of the Piedmont Reliability Project. Together, utilizing the ROW approach quickens permitting while minimizing legal battles and community backlash.

Overhead wires also have economic consequences for Maryland's citizens that are not accounted for in typical regulatory proceedings. Power outages can cost up to \$110,000 for businesses and lead to costly business downtime and lost GDP. Because underground wires experience less outages, businesses would experience far less economic downtime. According to calculated median reliability improvements, nationwide undergrounding could save \$17.1 billion every year in lost economic activity. Undergrounding wires also increases nearby property values by 5-20 percent because it removes the ugly appearance of power lines.

To better protect Maryland's scenic, historical, and environmentally sensitive areas, we recommend that the bill's language be strengthened to explicitly prioritize undergrounding as the preferred method for new transmission projects. Specifically, undergrounding should be the default approach along existing rights-of-way and in areas where visual impact, environmental preservation, and community concerns are key considerations. Likewise, the bill should include specific language that instructs the PSC to consider the implicit costs of overhead wires (e.g., vegetation management, overhead maintenance, natural disasters, and time required for permit) when considering overhead versus undergrounding.

While Scenic America generally opposes any overhead transmission line, we are aware that undergrounding all lines is impractical. We therefore encourage the prioritization of lines that go through sensitive areas, including public lands, historic sites, communities, and scenic areas. In cases in which undergrounding is not feasible, other methods should be considered to minimize visual impacts such as reconductoring, co-location with existing transmission lines, or avoiding

scenically sensitive areas. By adopting these strategies, Maryland can modernize its infrastructure while preserving its unique and treasured landscapes for generations to come.

Thank you for your commitment to protecting Maryland's scenic beauty and ensuring a reliable and resilient energy infrastructure. Please do not hesitate to contact me at [mark.falzone@scenic.org](mailto:mark.falzone@scenic.org) if I can provide further information or assistance.

Sincerely,



Mark Falzone  
President, Scenic America