



March 4, 2025

Education, Energy, and the Environment Committee
2 West Miller Senate Office Building
Annapolis, Maryland 21401

To the Maryland Senate Education, Energy, and the Environment 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 Senate Bill 0483. The state's commitment to improving grid reliability and resiliency can be strengthened by utilizing underground transmission lines along existing rights-of-way (ROWs). Not only does undergrounding improve grid resilience—which is especially important in an era of weather events intensified by climate change—but also utilizes existing infrastructure to preserve and protect our most treasured landscapes. This bill represents an important step in modernizing Maryland's electrical grid by ensuring that overhead transmission lines are not the default option for meeting the state's growing electrical demand, while also actively preserving the integrity and beauty of our surroundings.

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 undergrounding 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 Senator Gallion's introduction of Senate Bill 0483 to modernize Maryland's electrical infrastructure by encouraging the Public Service Commission to consider alternatives to new overhead transmission lines.

The need for statewide standards for undergrounding and co-location is especially evident in projects like the Piedmont Reliability Project. This proposed transmission line has raised serious concerns from residents and local governments in Frederick, Carroll, and Baltimore Counties due to its potential impact on farmland, conservation easements, and protected forest buffers. Without a clear, statewide approach to prioritizing undergrounding and co-location, projects like this are more likely to result in significant disruption to communities and scenic landscapes. Statewide transmission undergrounding provides a practical solution to address community concerns, protect sensitive areas, and respect property rights while addressing the electrical needs of the state. By strengthening the PSC's criteria, SB 0483 ensures that alternatives are carefully considered before any new transmission line is approved.

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.

While Scenic America supports the investigation of alternatives to overhead transmission lines, we urge a stronger emphasis on scenic conservation when evaluating any overhead transmission line. We suggest that the section “Will best maintain historical, environmental, or agricultural preservation areas;” be amended to say, “Will best maintain historical, environmental, scenic, or agricultural preservation areas.” By expanding Senate Bill 0483 to address concerns of aesthetics and undergrounding, Maryland can effectively demonstrate that infrastructure expansion and visual conservation can go hand in hand.

Additionally, 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 if I can provide further information or assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Falzone". The signature is fluid and cursive, with the first name "Mark" and last name "Falzone" clearly distinguishable.

Mark Falzone
President, Scenic America