



FREDERICK COUNTY GOVERNMENT

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County Executive

DIVISION OF PLANNING & PERMITTING

Livable Frederick Planning & Design Office

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October 3, 2024

Andrew S. Johnston, Executive Secretary
Maryland Public Service Commission
William Donald Schaefer Tower
6 Saint Paul Street
16th Floor
Baltimore, MD 21202

Re: Maryland Piedmont Reliability Project (MPRP) Public Comment

Dear Executive Secretary Johnston,

The Sustainable Monocacy Commission's mission is to review and recommend policies and proposals that restore, conserve, and protect the ecological health and productivity of the state-designated Monocacy Scenic River and its tributaries in Frederick County. The Commission cannot recommend that the Maryland Piedmont Reliability Project (MPRP), as proposed by the Public Service Enterprise Group (PSEG), would be beneficial or even neutral regarding impacts to the Monocacy Scenic River watershed or its residents. Rather, our unanimous position is that construction of the transmission lines would irreparably impair the health of the Monocacy Scenic River watershed and would be detrimental to the wellbeing of watershed residents. We understand that there is a growing demand for electricity to power new growth, including data centers, however the current MPRP proposal is not acceptable to the Commission.

News of the MPRP came as a surprise to all residents of Frederick County several weeks ago when PSEG introduced this proposal along with their plan to seize private property using eminent domain. The Sustainable Monocacy Commission would urge all readers of this letter to keep in mind that PSEG is a New Jersey-based corporation that has very little commitment to serving the citizens or environmental interests of Maryland. The interactive map, presented by PSEG, identifies multiple proposed greenfield routes through Frederick, Carroll, and Baltimore Counties. Several of the proposed routes run indiscriminately through environmentally sensitive areas that are crucial for the health of the Monocacy Scenic River watershed. In addition, a significant number of homes, farms, and businesses are impacted along the proposed routes.

Specifically, deforestation along creeks and rivers to facilitate the installation and maintenance of transmission lines would harm the Monocacy Scenic River in several ways:

1. It would result in increased amounts of potentially harmful run-off that would enter the Monocacy Scenic River and its tributaries, even from deforested areas that are not near streams.
2. Erosion of stream banks along the Monocacy Scenic River and its tributaries would occur because of removal of riparian forests.

3. The warming of water in the Monocacy Scenic River and its tributaries would occur due to increased sunlight exposure. This could add to existing state-determined temperature impairments within the Monocacy Scenic River watershed.
4. Deforestation would result in the loss of crucial wildlife habitat along the Monocacy Scenic River and its tributaries.
5. A decline in the natural and aesthetic quality of stream and river corridors would result from deforestation.
6. Noise pollution would be introduced by the transmission lines. In addition, we do not know the long-term impacts that electromagnetic radiation can have on the plant and animal species that live in these areas.

The Sustainable Monocacy Commission recommends that maintaining cool water temperature is critical. The Commission's 2023 Monocacy River Report states that, "Some water quality issues identified by MDE are not subject to a TMDL. The 2020-2022 Integrated Report noted water temperature impairments at creeks in both the Lower and Upper Monocacy watersheds. This means cold-water organisms like the brook trout and stream insects, called benthic macroinvertebrates, find it difficult to survive or may no longer be present. Overall, the Lower Monocacy Watershed also lacks a sufficient riparian buffer which means there are not enough trees and shrubs along streams and riverbanks. Riparian buffers prevent erosion, shade and keep waters cool, provide habitat, and filter runoff." (2023 Monocacy River Report, p.8). The Commission would note that the brook trout is native to Maryland and has been in decline due to environmental disturbance.

Particular areas of concern to the Sustainable Monocacy Commission for riparian buffer impacts caused by the MPRP in Frederick County include:

1. The Monocacy River upstream of Lily Pons Road, near the mouth of Bennett Creek, which would suffer from deforestation on both sides of the river. Results of this deforestation would include erosion, warming water temperatures, sedimentation, noise pollution and degradation of the scenic quality of the river.
2. Bennett Creek, a very important cold-water tributary to the Monocacy River which supports reproducing brown trout and native brook trout, would be seriously damaged for a long stretch on both banks of the creek. This will cause erosion, warming water temperatures, sedimentation, noise pollution and degradation of the scenic quality of the creek. If Bennett Creek were to get warmer some species of fish, including reproducing brown trout and native brook trout, may disappear entirely.
3. An unnamed cold-water tributary to the Monocacy River which begins in the forests behind Flint Hill United Methodist Church is threatened at its source where several springs are located.
4. An unnamed cold-water tributary to the Monocacy River which begins in the Hopeland area, near Flint Hill Road, is threatened with deforestation.

5. A nearly 1/2 mile stretch of Bush Creek is threatened with deforestation north of Ganley Lane and west of Green Valley Road near Ijamsville, MD.
6. The potential for over 150 feet of deforestation to occur along the banks of Linganore Creek and Ben's Branch east and/or west of Detrick Road, depending on the proposed alignment.
7. The Sugarloaf Treasured Landscape Area is threatened by deforestation, diminished quality of viewsheds, harm to streams, and noise pollution by proposed alignments that run parallel to Park Mills Road and through the Sugarloaf Treasured Landscape Management Planning Area.

Additionally, two Green Infrastructure "hubs," as identified by the Maryland Department of Natural Resources (MDNR) in GreenPrint mapping, in the Sugarloaf Treasured Landscape Area are bisected by one of the proposed routes. MDNR has described Green Infrastructure Hubs as "[t]he most ecologically important lands in the state."

Furthermore, the Sustainable Monocacy Commission also recommends that the MPRP process be halted at this time and other project alternatives options be more thoroughly explored. First and foremost, it should be determined if these new transmission lines are really needed. If new transmission lines are in fact needed, then several other options should be investigated before choosing a greenfield route that negatively impacts the Monocacy Scenic River, its watershed, and its tributaries—such as using existing rights-of-way (ROWs), reconductoring existing transmission lines, and using existing transportation (rail and roadway) corridors. If security or reliability is an issue, then subsurface installation of lines should be considered. The Sustainable Monocacy Commission encourages all parties involved to be creative and implement newer, more efficient technology to minimize the environmental impact of the transmission lines.

Lastly, the Sustainable Monocacy Commission recommends that the most obvious solution may be to use the existing right-of way (ROW) corridor owned by the Baltimore Gas & Electric Company (BG&E) that makes up the eastern boundary of PSEG's study area. This would impact fewer people and disturb fewer critically important ecological resources within the Monocacy Scenic River watershed.

We thank you in advance for your consideration of our comments on the MPRP.

Sincerely,



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Chair, Sustainable Monocacy Commission

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