

## Waterford Citizens' Association



WCA – PO Box 109, Waterford, VA, 20197, [president@waterfordcitizens.org](mailto:president@waterfordcitizens.org) 12/2/2023

PJM Interconnection, LLC Attn: Mr David Anders, TEAC Committee 2750 Monroe Boulevard Audubon, PA 19403

Subject: Proposal 2022-W3-853 - Advocacy for Brownfield Alternatives and Enhancement of Resilient Power Lines

Dear Mr. Anders & Members of the TEAC Committee,

I hope this letter finds you well. I am writing on behalf of the Waterford Citizens Association (WCA) to express our concerns regarding the proposed installation of 300-foot towers and 500 kV electric lines as outlined in the 2022-W3-853 proposal. Our primary focus is on the potential impact of this proposal on the Waterford National Historic Landmark and the surrounding community, see the Appendix on Waterford, Virginia's National Historic Landmark Status and Map.

Waterford, with its rich historical significance, is a testament to our shared heritage, and preserving its cultural and historical integrity is paramount. While we recognize the need for expanded electric capacity to meet the region's growing demands, we urge a reconsideration of the current plan in favor of alternative solutions that prioritize the preservation of our historical landmarks.

Upon reviewing the Reliability Analysis Update presented on October 31, 2023, we have identified several brownfield solutions that could be more cost-effective and entail fewer risks than the proposed route through the Waterford National Historic Landmark. Specifically, we recommend considering FE837, FE548, and FE904 as viable alternatives. These alternatives offer lower risk and more predictable timelines to reliability, aligning with the key tenet of the program: "Utilization of existing ROWs where possible and efficient."

By focusing on existing brownfield right-of-ways, we can simultaneously address the urgent need for increased electric capacity while minimizing the impact on our cultural heritage. We understand that the approval process for new routes may be challenging,

with potential delays spanning years. However, we argue that the utilization of existing ROWs not only adheres to the program's goals but also contributes to the overall design goal of enhancing the resiliency of power lines.

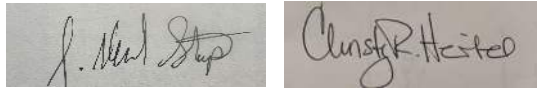
The Waterford Citizens Association is committed to collaborating with PJM to find a solution that balances progress with preservation. We believe that by considering brownfield alternatives, we can achieve both goals effectively.

For more information about our community and our organization, please visit our website at [<https://www.waterfordcitizens.org/>].

Thank you for your time and consideration. We look forward to engaging in a collaborative dialogue to address our concerns and work towards a solution that benefits both the community and the broader region.

Sincerely,

Mike Stup, VP, Waterford Citizens Association & Christy Hertel, President, WCA



Cc: Secretary: Nancy Doane & Treasurer: Maureen Arnold

### Preferred Solutions from West: 1) 837, 2)548, 3)904



### Preferred Proposals to Address Clusters - East

**FE: 2022-W3-837**

Build new 230 kV AC circuit from Hunterstown - Carroll

- Rebuild the existing Hunterstown – Carroll 115/138 kV Corridor as Double Circuit using 230kV construction standards
  - 230kV New Rating – 726SN/890SE/824WN/1056WE MVA
  - 115kV New Rating – 363SN/445SE/412WN/528WE MVA
- Reconductor Lincoln – Ortanna 115 kV Line
  - New Rating- 232SN/282SE/263WN/334WE MVA
- Fayetteville – Grand Point 138 kV - Replace line trap at Grand Point 138 kV
  - New Rating – 195SN/258SE/280WN/368WE MVA
- Reid - Ringgold 138 kV - Replace line trap, substation conductor, breaker at Ringgold, relaying and CTs
  - New Rating – 308SN/376SE/349WN/445WE MVA
- Cancel b3768 (Rebuild/Reconductor the Germantown - Lincoln 115 kV Line.) (Cost: \$17.36M)

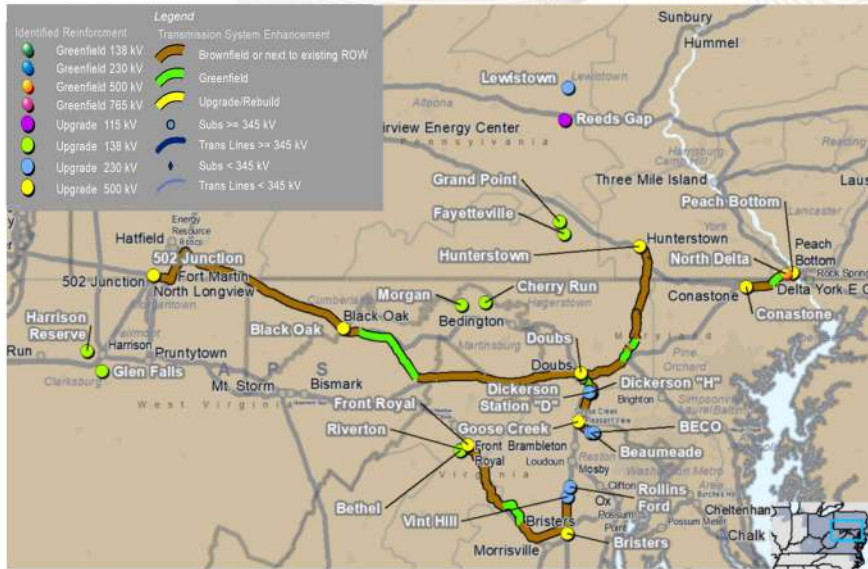
**Proposed Cost Estimate: \$137M**  
**Required In-Service Date : 6/1/2027**  
**Projected In-Service Date : 2028-2030**

NOTE: This map is only intended to illustrate the general electrical connectivity of the projects, and should not be relied upon for exact geographical substation locations or line routes.





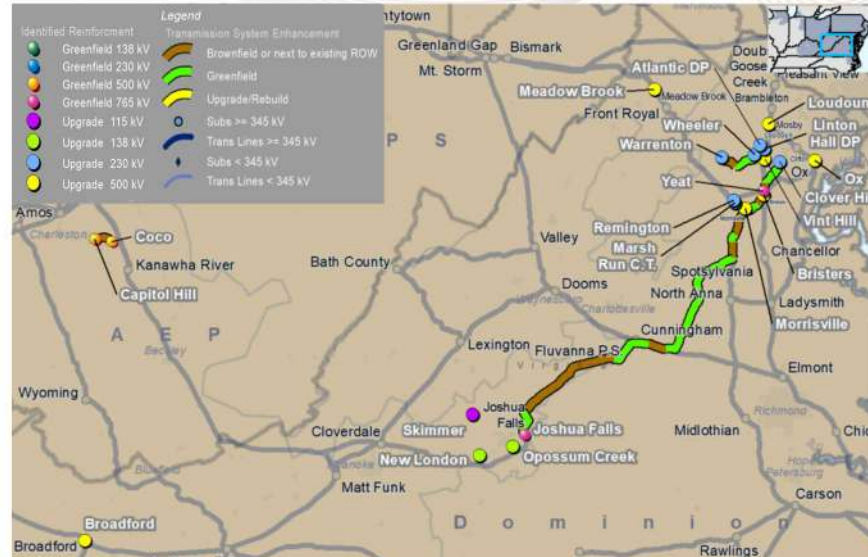
### 2022 Window 3 proposals – LS Power - 548



*NOTE: This map is only intended to illustrate the general electrical connectivity of the projects, and should not be relied upon for exact geographical substation locations or line routes.*



### 2022 Window 3 proposals – Transource - 904



*NOTE: This map is only intended to illustrate the general electrical connectivity of the projects, and should not be relied upon for exact geographical substation locations or line routes.*

Waterford is a National Historic Landmark, which the US Department of Interior puts on a par with Mount Vernon and Monticello. In the 2023 affirmation of our Landmark status that was originally granted in 1970, the nomination report noted the following about Waterford’s historic importance to the nation:

*“As a result of almost a century of historic preservation efforts, the Waterford Historic District retains a high level of integrity—including integrity of location, design, setting, materials, workmanship, feeling and association. Beyond the remarkably well-preserved architecture in the village core, Waterford’s natural features—including hedgerows, tree lines, waterways, and viewsheds—have also been sensitively conserved and continue to represent an authentic rural agricultural service village set within farmlands. Additionally, beyond the preservation of its historic resources, the very limited modern infill, especially within the historic core, is notable. The integrity of the district is, in fact, due as much to the lack of twentieth and twenty-first century development in the village core and surrounding agricultural lands as it is to the high degree of integrity found in the individual historic buildings. **Waterford’s exceptional significance is thus partially derived from its overall appearance—including evocative viewsheds within and outside the village in nearly every direction. The intact views and vistas add greatly to the authentic feel of a rural village as it might have appeared during the nineteenth century, featuring only houses, a few small businesses in the village core, and historic farms and meadows enveloping the village core. As a result, the Waterford Historic District’s integrity is exceptionally high.**”*

[https://home.nps.gov/subjects/nationalhistoriclandmarks/upload/Waterford\\_HD\\_update\\_Figures\\_2022-04-03.pdf](https://home.nps.gov/subjects/nationalhistoriclandmarks/upload/Waterford_HD_update_Figures_2022-04-03.pdf)

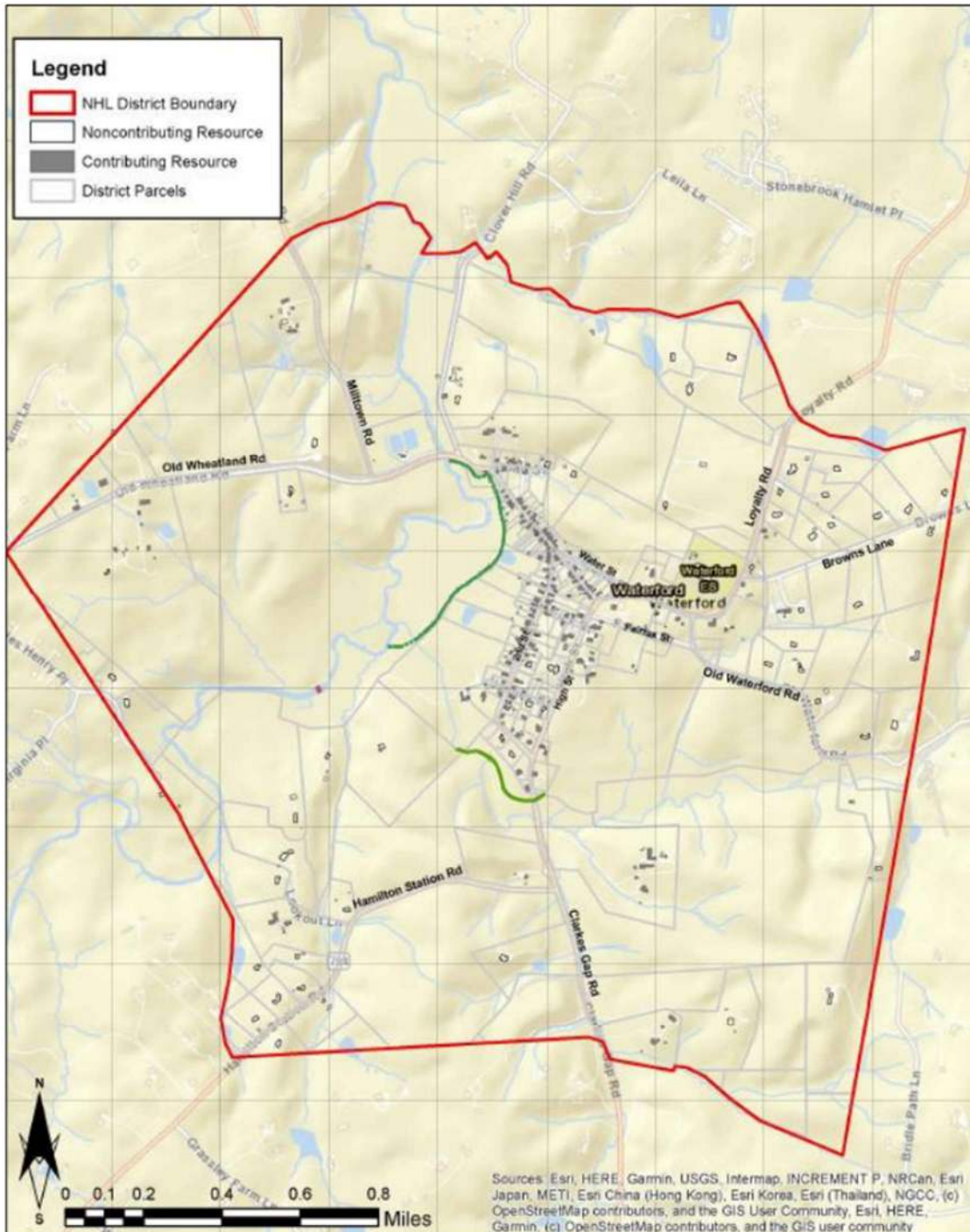


# WATERFORD HISTORIC DISTRICT

United States Department of the Interior, National Park Service

## Figures

National Historic Landmarks Nomination Form



Map 2: Waterford National Historic Landmark District Boundary Map.