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December 1, 2023

Mr. David Anders, Secretary PJM Board of Managers

Mr. Anders,

I am writing on behalf of the Board of Directors of the Waterford Foundation in Waterford, Virginia. We have learned of the PJM's recommendation to build a new power transmission line through property owned by the Waterford Foundation. We understand the Board will be voting on selected projects on December 11 and we wanted the Board to be aware of our serious concerns with your proposed path for the transmission line.

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."

Power lines that are over 300 feet tall, in a swath spanning 30 to 50 feet wide would destroy that precious integrity and violate the protective easement on that land held by the Virginia Outdoors Foundation. The Waterford Foundation strongly opposes the PJM's plan. It is important to note that the Virginia State Constitution prohibits the use of eminent domain seizure for the purposes of economic development, which is clearly the intent of this project.

The Foundation will take any steps necessary to protect its eased and protected land and historic viewshed as this process proceeds. Waterford hosts tens of thousands of visitors each year who come to experience and learn from the preserved 19<sup>th</sup> century village and surrounding open spaces.

We assume the PJM was unaware that they were projecting construction of this line through a National Historic Landmark and that once you are aware of the significance of this historic site you will adjust your plans accordingly.

Respectfully,

Susan Manch

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President, Waterford Foundation Board of Directors

cc.

Kathryn G. Smith, National Historic Landmarks & National Register Coordinator National Park Service

Erika Richardson, Assistant Director, Piedmont Region, Virginia Outdoors Foundation

Stephanie Thompson, Executive Director, Waterford Foundation Abigail Zurfluh, Historic Preservation Director, Waterford Foundation Waterford Foundation Board of Directors