

**DIRECT TESTIMONY  
OF  
JENNIFER HALLOCK  
ON BEHALF OF  
PIEDMONT ENVIRONMENTAL COUNCIL  
BEFORE THE  
STATE CORPORATION COMMISSION OF VIRGINIA  
CASE NOS. PUE-2007-00031 AND PUE-2007-00033**

1 **Q. WOULD YOU STATE YOUR NAME?**

2 A. Jennifer Hallock.

3 **Q. WHAT IS YOUR BUSINESS ADDRESS?**

4 A: My business address is P.O. Box 138, Keswick Virginia.

5 **Q. HOW ARE YOU EMPLOYED?**

6 A. I am a Principal of Arcadia Preservation, LLC. Arcadia Preservation is a historic  
7 preservation consulting firm specializing in the documentation and preservation of  
8 Virginia's historic resources. Exhibit JH-1. The firm offers services that include  
9 architectural history, survey and documentation, tax credit applications, as well as  
10 building conservation, renovation and restoration consultation. The firm meets all  
11 National Park Service requirements under 36 CFR 61 as architectural historians. Exhibit  
12 JH-2.

13 **Q. WHAT IS YOUR RELEVANT EXPERIENCE?**

14 A. I have performed a county-wide historic resources survey and report for  
15 Rappahannock County and the Virginia Department of Historic Resources (VDHR) in  
16 2002-2003 as an architectural historian with EHT Traceries. In addition, I have continued  
17 to work for Rappahannock County after founding Arcadia Preservation in 2003. We  
18 have completed a National Register (NR) nomination for the Laurel Mills Historic

1 District and are currently completing eligibility reports, a Preliminary Information Form  
2 (PIF), for four rural historic district nominations.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY:**

4 A. Counsel for the Piedmont Environmental Council asked me to analyze the effect  
5 on the Rappahannock County Comprehensive Plan (available at  
6 <http://www.rappahannockcountyva.gov/page3/page3.html>) of the proposed 500-kV  
7 Meadow Brook-Loudoun transmission line (Loudoun line) alternatives in these  
8 proceedings. I have done so and will show that the proposed transmission line will go  
9 through a part of the country that has undertaken serious efforts to protect the land in a  
10 comprehensive way both through local planning efforts and through private preservation  
11 actions that are rigorously reviewed by state agencies at every step. These goals are  
12 implemented through zoning, subdivision ordinances, Land Use Assessments,  
13 Agricultural Forestal Districts, Open Space Easements, Scenic Easements and Historic  
14 Districts that adhere to the stated goals and objectives. The Loudoun line is clearly in  
15 opposition to these goals. Exhibit JH-3.

16 Because I have a particular background in Rappahannock County I will  
17 demonstrate that the goals and objectives of the Rappahannock County Comprehensive  
18 Plan will be badly compromised and the Loudoun line will adversely affect a large  
19 number of historic properties located along the line's proposed routes.

20 **Q. WERE YOU ASKED, MS. HALLOCK, TO FOCUS ON PARTICULAR**  
21 **ASPECTS OF THE APPLICATIONS?**

22 A. Yes. Counsel asked me to look at the impact of the lines on historic properties  
23 and Historic Districts.

1 **Q. ARE YOU FAMILIAR WITH THE IDENTIFICATION, EVALUATION**  
2 **AND CREATION OF HISTORIC DISTRICTS?**

3 A. Yes. I am.

4 **Q. DO THE ROUTES PROPOSED IN THE APPLICATIONS HAVE AN**  
5 **IMPACT ON HISTORIC DISTRICTS?**

6 A. Yes. Both the Preferred and Alternate Routes will impact Historic Districts. The  
7 Alternate Route, in particular, impacts many Historic Districts, including the John  
8 Marshall/Leeds Manor Historic District, the Crooked Run Valley Historic District, the  
9 Marshall Historic District and several others. The Preferred Route also impacts the John  
10 Marshall/Leeds Manor Historic District, the Remington Historic District, and the  
11 Bristersburg Historic District, among others. Both routes impact the Manassas  
12 Battlefield and Manassas Battlefield Historic Expansion Districts.

13 **Q. WHAT IS REQUIRED TO CREATE A HISTORIC DISTRICT?**

14 A. The process for listing a property on the NR is a rigorous process overseen on the  
15 state level by the VDHR and at the federal level by the National Park Service, as the U.S.  
16 Congress directed in the National Historic Preservation Act of 1966. Available at:  
17 <http://www.nps.gov/history/local-law/nhpa1966.htm>. A multi-tiered registration process  
18 provides checks and balances at various points in the application process to ensure that  
19 the official determination and listing is non-biased and is not arbitrary or capricious.

20 **Q. MS. HALLOCK, CAN YOU DESCRIBE HOW THAT PROCESS IS**  
21 **CARRIED OUT IN VIRGINIA?**

22 A. Yes. A PIF is submitted to the Regional VDHR office for initial review. The  
23 application includes an architectural description, significance statement, photographs,

1 maps, and a boundary explanation and justification. After review at the Regional VDHR,  
2 the completed PIF is forwarded to the main VDHR office in Richmond. After further  
3 review by an in-house Evaluation Team, the PIF is then publicly reviewed by the State  
4 Review Board that meets quarterly. Once the Board determines the property eligible, the  
5 property may proceed with a full NR nomination.

6 **Q. CAN YOU DESCRIBE WHAT HAPPENS NEXT?**

7 A. Certainly. A NR nomination follows a rigorous process similar to the PIF. The  
8 nomination form is more detailed and will incorporate any suggestions from the Review  
9 Board at the PIF level. Additionally, the nomination will fully address the required  
10 historic significance and integrity of the property as stipulated by the NR of Historic  
11 Places criteria and will present defensible boundaries. Exhibit JH-4. A review process  
12 moves from the Regional VDHR office, to the main VDHR office. A letter to all owners  
13 and adjacent owners is also mailed asking for public comment or opposition. The  
14 nomination is then presented to the State Review Board at a public quarterly meeting. At  
15 this point, a favorable review culminates with listing on the Virginia Landmarks Register.  
16 The nomination is then forwarded to the National Park Service for final approval. For  
17 further information, the process is fully detailed in *Virginia's Historical Registers: A*  
18 *Guide for Property Owners*, a publication by VDHR.

19 **Q. ARE THE NOMINATIONS PUBLICLY AVAILABLE?**

20 A. Yes. The National and State Nominations are all on-line at  
21 [http://www.dhr.virginia.gov/registers/register\\_counties\\_cities.htm](http://www.dhr.virginia.gov/registers/register_counties_cities.htm)

22 **Q. WHAT IS THE SIGNIFICANCE OF HISTORIC DISTRICTS TO THE**  
23 **CULTURAL LANDSCAPE OF THIS AREA?**

1 A. Yes. Each has undergone the vigorous application process at either the PIF or full  
2 NR listing level. It is the professional opinion of Arcadia Preservation that this process  
3 has been followed in each case and that the final determination of eligibility or full  
4 nomination is neither arbitrary nor capricious. A review of each nomination form has  
5 seconded that opinion. The criteria for listing are justified in each case and the  
6 boundaries appear to be drawn to sufficiently substantiate the property's historic  
7 significance and integrity.

8 **Q. IN YOUR REVIEW OF THE APPLICATIONS, DID YOU LOOK FOR**  
9 **INDICATIONS OF HOW THE APPLICANTS PROPOSED TO MITIGATE THE**  
10 **IMPACT ON THESE HISTORIC DISTRICTS?**

11 A. Yes. I looked for mitigation. The photographs and text in the Department of  
12 Environmental Quality supplement and the DHR appendix shows that the applicants  
13 appear to rely exclusively on topography or existing vegetation to mitigate the impacts of  
14 the proposed transmission line and poles. The John Marshall/Leeds Manor Historic  
15 District is good example of how the applicants approached mitigation.

16 **Q. WHAT DID THE APPLICANTS DO, MS. HALLOCK?**

17 A. The John Marshall/Leeds Manor Historic District encompasses 22,184 acres. It is  
18 represented in the DHR appendix with a single photograph taken from behind a hill 3,900  
19 feet from the proposed route. A better representation of the impact on John  
20 Marshall/Leeds Manor Historic District is found in the viewshed analysis and DHR map  
21 locator sheet 1 of 2 for the alternate route. This shows the severe impact that will be  
22 imposed on many areas within this area and the Crooked Run Valley Rural Historic  
23 District and the Markham Historic District.

1 **Q. WHAT IS YOUR ASSESSMENT OF THE APPLICANTS' APPROACH?**

2 A. That the applicants are using selective photography conceal the severe damage  
3 that the Loudoun line will inflict on historic districts. They are not proposing any active  
4 measure to minimize the adverse effects of their routes, instead relying on hills and  
5 seasonal tree cover to hide the line in some places.

6 **Q. ARE YOU FAMILIAR WITH SPECIFIC AREAS WHERE THE**  
7 **PROPOSED TRANSMISSION LINE WOULD HAVE AN IMPACT?**

8 A. Yes, very much so. Since founding Arcadia Preservation in 2003, I have worked  
9 with Rappahannock County to develop findings from the survey into historic districts,  
10 rural historic districts, and individual NR listings. This process is continuing.

11 **Q. CAN YOU DESCRIBE RAPPAHANNOCK COUNTY?**

12 A. Yes. Rappahannock County, Virginia is a small county located in Virginia's  
13 northern Piedmont region. With a land mass of 266.6 square miles and 26 persons per  
14 square mile, Rappahannock is rural, with one of the lowest population densities in the  
15 state. Located on the ex-urban fringe just 65 miles from Washington, DC, the county's  
16 rural character has been intentionally retained through careful planning and the  
17 implementation of successful land preservation policies.

18 **Q. PLEASE DESCRIBE THE CHARACTER OF RAPPAHANNOCK**  
19 **COUNTY?**

20 A. Fifty percent of its land are located within the boundaries of Shenandoah National  
21 Park, 34 percent of the land is designated as agricultural land use, 7.6 percent is vacant,  
22 and only 1.92 percent is considered developed.

1 **Q. CAN YOU DESCRIBE THE POPULATION OF RAPPAHANNOCK**  
2 **COUNTY?**

3 A. Yes. As of 2000, Rappahannock’s population was 6,983 persons. This has  
4 changed little, and has actually decreased since 1940 (population 7,208). Serving as an  
5 agricultural district and a commuter and weekender community, the population of  
6 Rappahannock County in general is educated and dedicated to preserving the character of  
7 its county. Commitment to retaining Rappahannock’s rural “scenic” character has  
8 constrained suburban development, both residential and commercial. As a result the  
9 county is structured on a village system, with numerous local villages providing the  
10 every-day needs to the local community. Consequently, no shopping malls, large-scale  
11 grocery stores, fast-food restaurants, or stoplights are located within the county.

12 **Q. UPON WHAT DO YOU BASE YOUR CONCLUSION THAT THE**  
13 **RESIDENTS OR THE COUNTY ARE TRYING TO PRESERVE A RURAL**  
14 **SCENIC CHARACTER?**

15 A. Using Rappahannock County’s Comprehensive Plan as evidence, it is clear that  
16 the retention of the county’s rural character and scenic beauty are guiding principles to  
17 the county’s everyday decision-making and long-range planning. The Comprehensive  
18 Plan acknowledges that “as a rural jurisdiction on the ex-urban fringe of the Washington  
19 D.C. Metropolitan Area, Rappahannock County has been made acutely aware of the ever-  
20 changing dynamic of growth and development.” Exhibit JH-5. However, “a long  
21 tradition of progressive planning and land use policy” has been undertaken because it is  
22 widely acknowledged that “Rappahannock is unique and that there is a natural beauty and  
23 order that command our respect.” Exhibit JH-5.

1 **Q. IS THIS COMPREHENSIVE PLAN A REACTION TO THE PROPOSED**  
2 **LINE, MS. HALLOCK?**

3 A. No. The Plan was created 45 years ago in 1962. Since that time it has evolved to  
4 meet the community's growing challenges while keeping the its original goals and  
5 principals as guidelines for shaping the "scenic" county's future.

6 **Q. DOES THE COMPREHENSIVE PLAN ATTEMPT TO GUIDE THE**  
7 **DEVELOPMENT OF THE COUNTY?**

8 A. Yes, it does. Within the framework of the Land Use Plan, scenic county is  
9 defined as "one in which preservation and enhancement of the natural and historic beauty  
10 and cultural value of the countryside shall be respected as being of foremost importance."  
11 Exhibit JH- 3. Goals pursuant to these principals include "To preserve the overall  
12 viewshed of the county in its unspoiled, natural setting, which gives it special character  
13 and identity" and "To protect the natural, scenic, and historic resources, thus ensuring a  
14 high quality of life for our citizens." Exhibit JH-3.

15 **Q. DOES THE COUNTY ALSO SEEK TO PROTECT ITS HISTORIC AND**  
16 **NATURAL CHARACTER?**

17 A. Yes. Other principals set forth by the Comprehensive Plan include "Preserve the  
18 natural, historic, recreational and scenic values, along with the healthy economy of the  
19 forested land and resource preservation districts so as to ensure that development in those  
20 areas is in conformance with their natural beauty and environmental limitations," to  
21 "[p]rotect natural resources including soils, water, air, viewsheds, scenery, and fragile  
22 ecosystems," to "[p]reserve and protect the historic character and features of the county,"  
23 to "[e]nsure that the provision of capital improvements...enhances the quality and

1 character of rural and open-space environments,” and to “[p]romote the philosophy that  
2 land is a finite resource and not a commodity, that all citizens are stewards of the land,  
3 and that the use and quality of the land are of prime importance to each present and future  
4 citizen as well as to the Commonwealth, the Country and indeed, the world.” Exhibit JH-  
5 3.

6 **Q. ARE RESIDENTS INVOLVED IN DEVELOPMENT OF THESE**  
7 **POLICIES?**

8 A. Very much so. Policies to “[p]reserve and protect the historic character and  
9 features of the County” are defined as ones that:

- 10 1. Are supported by local residents, support the establishment of  
11 historic districts to protect recognized properties of historic value and to  
12 retain the integrity of historic neighborhoods.
- 13 2. Are supported by local residents, support the establishment of rural  
14 historic districts to protect recognized properties of historic value that  
15 are located outside village and town settings that include historic buildings  
16 and the extensive surrounding historic landscapes and estate  
17 grounds. The county should work towards the creation of at least one  
18 such district in the coming five (5) years.
- 19 3. Ensure that proposed development is compatible with the architectural  
20 attributes of nearby or adjoining historic properties, neighborhoods,  
21 and districts.
- 22 4. Promote the placement of scenic easements particularly (but not  
23 limited to) on lands associated with historic buildings and sites and

1 those on the NR of Historic Places, and seek to protect  
2 the scenic value of those lands when land use decisions and plans are  
3 made.

4 5. Promote the placement of scenic easements on lands adjoining (but  
5 not limited to) roads designated as Scenic Highways or Virginia  
6 Byways and seek to protect the scenic and recreational value of those  
7 lands when land use decisions and plans are made.

8 6. Provide design incentives and land use controls for new development  
9 along gateways to historic areas so that such new development will be  
10 compatible and harmonious with the historic area. And

11 7. Support signage and other recognition of important historical sites.

12 Exhibit JH-3.

13 **Q. ARE YOU FAMILIAR WITH HOW THESE POLICIES CAME INTO**  
14 **BEING?**

15 A. Yes. Through detailed analysis and public participation. The Comprehensive  
16 Plan breaks Future Land Use down into topics of importance including Natural  
17 Resources, Agriculture, Economic Development, Residential Development, Historic  
18 Preservation, Community Facilities, and Transportation. Each is explored through the  
19 need to maintain and enhance rural nature and scenic beauty. A community planning  
20 study characterized Rappahannock's greatest strengths as "its people, its unspoiled  
21 natural beauty, and the local government responsiveness to local needs." Exhibit JH-6.  
22 Other relevant findings included low density and population growth, no stoplights,  
23 development, fast food stores, 7-11's or Wal-Marts, 10% of county in conservation

1 easements, zoning ordinance that protects rural nature of the county, a comprehensive  
2 plan that requires policies to respect rural and scenic qualities, that the tax base is  
3 farming, and that there is deep historic significance. In addition, participants of the study  
4 found Rappahannock to be at a critical juncture, realizing that continued vigilance and  
5 implementation of the plan is vital to the retention of the county’s rural scenic character.

6 Relevant examples from a “Summary of Our Vision” for the future states:

7 We desire that our region and communities in the future will.

- 8 • Succeed, where others have failed, in managing growth and change to  
9 preserve those characteristics that we value and seek to sustain.

10 *We seek “places of character.”*

- 11 • Retain their rural and small town feel and preserve their timeless  
12 scenic resources.

13 *We seek “places of beauty.”*

- 14 • Provide infrastructure for the scale and types of communities we  
15 desire.

16 Exhibit JH- 7.

17 These goals, set forth by the Rappahannock County Comprehensive Plan, will be  
18 implemented through zoning, subdivision ordinances, Land Use Assessments,  
19 Agricultural Forestal Districts, Open Space Easements, and Continued Planning that  
20 adheres to the stated goals and objectives. The proposed Loudoun line alternatives are in  
21 opposition to the instituted goals and plans of the Rappahannock County Comprehensive  
22 Plan and potentially adversely affects a large number of historic properties located along  
23 the line’s proposed route.

1 **Q. MS. HALLOCK, IS THE LOUDOUN LINE CONSISTENT WITH THE**  
2 **GOALS EXPRESSED BY THE COUNTY AND ITS RESIDENTS?**

3 A. No. The proposal by Trans-Allegheny Interstate Line Company (TrAILCo) and  
4 Dominion (DVP) to significantly expand electric transmission line across the entire  
5 northern/northeastern portion of the county negates the many years of careful planning by  
6 the local residents to retain the natural and historic integrity of Rappahannock County.

7 **Q. BUT ISN'T IT TRUE THAT THERE IS AN EXISTING TRANSMISSION**  
8 **LINE IN RAPPAHANNOCK COUNTY THAT TRAILCO AND DVP SAY THEY**  
9 **ARE FOLLOWING?**

10 A: Yes. According to the application, the proposed southern route of the transmission  
11 line expansion project does follow an existing route; however the size and scale of the  
12 new towers would be significantly larger than the existing towers. In my opinion, the  
13 added height and mass would create a much more prominent, and detrimental, visual  
14 impact on the rural Rappahannock County landscape. The route extends approximately  
15 12 miles across northern and northeastern Rappahannock County.

16 **Q. DOES THE PROPOSED ROUTE CROSS ANY REGISTERED HISTORIC**  
17 **RESOURCES IN RAPPAHANNOCK COUNTY?**

18 A. No. Unlike other counties along the routes, the route does not cross any  
19 properties currently registered on the NR of Historic Places in Rappahannock County.

20 **Q. DOES THIS MEAN THAT THERE IS NO IMPACT IN RAPPAHANNOCK**  
21 **COUNTY?**

22 A. To the contrary. There are numerous historic resources and an intact rural and  
23 cultural landscape that will be greatly affected by the Loudoun line. As evidenced by the

1 findings from the 2002 architectural survey, there are many historic resources located  
2 within the Area of Potential Effect (APE), which is currently defined as a half-mile on  
3 each side of the Loudoun line route. On-site tests for tower visibility should be  
4 performed in order to justify or expand this APE. There are twelve (12) properties along  
5 the route that have been previously documented, ten (10) at the reconnaissance level and  
6 two (2) at the intensive level. The architectural survey was a county-wide effort to  
7 identify a range and sampling of historic resources by date and type and should by no  
8 means serve as a comprehensive list of all significant properties. The windshield survey  
9 component, which applied a circa date to each property, does help provide an  
10 understanding of the number of historic properties within the APE. The two properties  
11 intensively surveyed (078-5022 and 078-5021) were chosen based on resource type and  
12 interior accessibility and should not be viewed as the only potentially eligible properties  
13 in the area. Both were determined ineligible for individual listing on the NR by the  
14 VDHR Evaluation Team in 2003. However, it was determined that 078-5022 should be  
15 reevaluated once the building's expansions became historic (fifty- years old) in 2005. It  
16 is my opinion that a current review of the property would reveal a determination of  
17 eligibility.

18 **Q. CAN YOU ELABORATE ON THE PROPERTIES THAT HAVE NOT**  
19 **BEEN EVALUATED?**

20 A. The reconnaissance-level documented properties, not evaluated for NR eligibility,  
21 but located within the APE include:

22 078-0076 Sandy Hook /Huntly Baptist Church, circa 1800;

23 078-0078 Wakefield Boarding School Facility, circa 1900;

1 078-0079 House, circa 1850;  
2 078-0083 House, circa 1840;  
3 078-0099 Truss Bridge, circa 1915;  
4 078-0097 Deardorff House, circa 1870;  
5 078-0084 House, circa 1840;  
6 078-5096 Bunree, circa 1880;  
7 078-5095 Locust Grove, circa 1815;and  
8 078-5083, circa 1870

9 Bunree and Locust Grove were both recommended to be further documented and  
10 evaluated for NR eligibility during the survey process.

11 **Q. IS THERE MORE ANALYSIS TO BE DONE THAT HAS NOT YET BEEN**  
12 **DONE BY THE DHR?**

13 A. Yes. Evaluation of historic significance based only upon previously determined  
14 NR-eligibility is an arbitrary process that would potentially exclude a large majority of  
15 potentially eligible properties. An on-site evaluation of all historic properties is the only  
16 comprehensive way to evaluate potentially affected properties. In the case of  
17 Rappahannock County, the task is much easier since windshield survey of all properties  
18 with noted circa dates has already been completed. The results of that survey are on file  
19 at the Virginia Department of Historic Resources Archives and are noted on USGS quad  
20 maps.

21 **Q. ARE THERE OTHER REVIEWS THAT SHOULD BE DONE?**

22 A. Yes. The scope of the project review for this entire project should extend beyond  
23 the evaluation of individual properties and also incorporate potential Rural Historic

1 Districts. The 2002 Historic Resources Survey recommended the creation of a Wakefield  
2 Rural Historic District in the northern portion of the county, which would be transversed  
3 by the proposed transmission line. A preliminary review of the eligibility of the district  
4 was undertaken in 2004. While initial field studies by Arcadia Preservation were  
5 unsuccessful in determining defensible boundaries for the proposed district, this was not  
6 based on a lack of eligible properties. The problem arose due to the vast scenic and  
7 cultural significance of a much larger area making differentiation of a smaller area almost  
8 impossible. Rappahannock's cultural landscape should be looked at as a whole, rather  
9 than as a mere sum of its parts.

10 **Q. DO YOU HAVE ANY OTHER OBSERVATIONS ON THE IMPACT ON**  
11 **RAPPAHANNOCK COUNTY?**

12 A. In sum, the significant expansion of the TrAILCo/DVP transmission line, despite  
13 following an existing transmission line route, adversely affects a large number of historic  
14 properties and diminishes the overall rural and scenic nature of Rappahannock County.  
15 Surrounded by wanton development throughout the Northern Virginia area,  
16 Rappahannock County stands as an oasis of pastoral beauty and intact historic integrity.  
17 The expansion is in direct opposition to many years of careful planning and public policy  
18 by the Rappahannock County citizens who have worked tirelessly to preserve the  
19 county's unique rural character and intact cultural landscape. By jeopardizing the  
20 county's historic integrity with the expanded transmission lines, the impact would be  
21 grave, including a diminished understanding of the area's historic importance and a  
22 detrimental impact upon the vast panoramic viewsheds in the rural county. In the future,  
23 this impact would preclude the county's reliance on its scenic landscapes for economic

1 viability. Future listings on the NR of Historic Places would be greatly reduced and the  
2 ability to maintain a non-developed landscape through conservation easements would be  
3 at significant risk

4 **Q. THANK YOU, MS. HALLOCK, NO FURTHER QUESTIONS.**