

**DIRECT TESTIMONY  
OF  
KIMBERLY ABE  
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. Kimberly Abe

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

4 A. My work address is 10 Hotel Street, Warrenton, VA 20186

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

6 A. I am employed as a Senior Planner in Fauquier County Community Development. My  
7 responsibilities include reviewing developments for their conformance with the Comprehensive  
8 Plan, Comprehensive Plan Updates, and coordinating historic preservation activities and  
9 projects. I am involved in a joint county and American Battlefield Protection Program public  
10 education project regarding twelve Civil War battlefields within Fauquier County that are listed  
11 among the 384 most important in the war. Incidentally, the transmission line proposal could  
12 potentially denigrate at least 4 of these 12 nationally significant battlefield cultural landscapes.  
13 Exhibit KA-1.

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

15 A. I have been employed as a Senior Planner in Fauquier County Community Development  
16 since February 2006. Before that I worked as a preservation planner in Baltimore County,  
17 Maryland for approximately nine years, during which time I also obtained a Masters Degree in  
18 Historic Preservation from Goucher College. I am a qualified architectural historian, satisfying  
19 National Park Service standards under 36 CFR Part 61. I also hold a Masters Degree in

1 Community Planning. I worked for approximately ten years as a community planner in Southern  
2 California.

3 **Q. ARE YOU HERE IN YOUR CAPACITY AS AN EMPLOYEE OF FAUQUIER**  
4 **COUNTY?**

5 A. No. I am here presenting my own professional opinion.

6 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY, MS. ABE.**

7 A. I have been asked by counsel for the Piedmont Environmental Council to evaluate the  
8 effect on scenic and historic rural landscapes in Fauquier County that would result if the 500-kV  
9 Meadow Brook-Loudoun transmission line (Loudoun line) proposed in these proceedings were  
10 to be constructed. I was also asked to opine on the consistency of the proposed transmission line  
11 with Fauquier County's Comprehensive Plan, and on the adequacy of the Department of Historic  
12 Resources (DHR) Appendix to the Department of Environmental Quality (DEQ) Supplement for  
13 this proposal (DHR Study).

14 **Q. CAN YOU SUMMARIZE YOUR TESTIMONY?**

15 A. I will demonstrate that the proposed Loudoun line alternatives conflict with  
16 Fauquier County Comprehensive Plan goals to preserve scenic and historic rural landscapes.  
17 The proposed Loudoun line alternatives are in direct conflict with the goals of the Fauquier  
18 County Comprehensive Plan. The DHR Study, which is intended to address impacts to scenic  
19 assets, historic districts, and their environmental components, is a fundamentally flawed study.  
20 Foremost, the DHR Study does not identify all potentially impacted scenic, historic, and  
21 environmental resources. Impacts cannot be properly studied if all the resources are not  
22 identified. A complete list of impacted resources should include those already identified on  
23 historic inventories and listed on the National Register, resources recognized as eligible for

1 listing on the Register, as well as resources that are potentially eligible for listing on the Register,  
2 but have not been reviewed yet for their eligibility. The DHR Study should also consider locally  
3 significant historic resources as well as State designated scenic roads and scenic rivers. The  
4 DHR Study identifies only a small percent of all these types of resources.

5         Additionally, the impact analysis methodology represented within the DHR Study does  
6 not provide for a comprehensive and objective determination of potential direct and indirect  
7 adverse impacts. Moreover, the DHR Study does not sufficiently address mitigation issues and  
8 measures. I will discuss these inadequacies in the DHR Study in more detail within the  
9 remainder of this testimony.

10 **Q. PLEASE EXPLAIN HOW THE FAUQUIER COUNTY COMPREHENSIVE**  
11 **PLAN WAS DEVELOPED.**

12 A. Visionary leaders and residents in this region of Virginia embraced and overcame tough  
13 controversies to establish methods and systems to preserve its historic, environmental, and scenic  
14 attributes. The combination of mountains, foothills, and views to those resources from distant  
15 vantage points on gently rolling fertile lowlands has helped to raise widespread community  
16 consciousness about how special this historic landscape is and has been and should remain so in  
17 the future. From my experience and continued observations, this area has preserved nationally  
18 significant assets in the best way possible. Preservation of these resources formed the basic  
19 framework for planning for the region's future.

20         The county's well-established system of government policies and ordinances continue to  
21 preserve its rural landscape. These policies and ordinances, in turn, have fostered high levels of  
22 private land preservation and historic stewardship. This rural preservation public-private  
23 partnership employs a number of implementation tools including Comprehensive Plan Goals, the

1 Zoning Ordinance, the Subdivision Ordinance, Land Use Assessments, Agricultural and Forestal  
2 Districts, Open Space Easements, Scenic Easements, Historic Easements, Historic Districts and  
3 other types of historic designations. This public-private system has been refined and expanded  
4 over the last twenty years to preserve Fauquier County's unique scenic and historic rural  
5 character.

6 **Q. WERE YOU ASKED TO FOCUS ON PARTICULAR ASPECTS OF THE**  
7 **APPLICATION?**

8 A. Yes. I was asked by counsel to look at the impact of the lines on historic properties and  
9 the Fauquier County Comprehensive Plan is available at:  
10 <http://www.fauquiercounty.gov/Government/Departments/CommDev/index.cfm?action=comppl>  
11 an1

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

14 A. Yes I am.

15 **Q. DO THE ROUTES PROPOSED IN THE APPLICATIONS HAVE AN IMPACT**  
16 **ON HISTORIC DISTRICTS.**

17 A. Yes. In my opinion the Preferred Route and Alternate Routes each negatively impact  
18 Historic Districts that have already been documented and listed on the National Register, districts  
19 that are eligible for listing on the Register but not yet listed, as well as areas and resources that  
20 are likely to be eligible for listing but have not yet been identified as such. Additionally, there  
21 are several types of resources, such as goldmines and dairy farms that are also potentially eligible  
22 for listing on the National Register. Properties can be nominated to the Register and come in a  
23 variety of forms, including individual properties, historic districts and Multiple Property

1 Submissions. A Multiple Property Submission is the appropriate format for nominating groups  
2 of related properties, like goldmines or dairy farms. (Virginia Department of Historic Resources  
3 (VDHR) maps indicate the existence of a goldmine archaeology site within the existing  
4 transmission line right-of-way north of Morrisville in Southern Fauquier County. This resource  
5 would be one of approximately twenty contributing resources forming part of a Multiple  
6 Property Nomination for Goldmines in Fauquier County.)

7 **Q. WHICH SPECIFIC HISTORIC DISTRICTS ARE IMPACTED?**

8 A. The Preferred Route impacts John Marshall/Leeds Manor Historic District, Remington  
9 Historic District, and Bristersburg Historic District. The Preferred Route also impacts the  
10 National Register-eligible Rappahannock I and Rappahannock II Civil War Battlefields districts.  
11 Please see Exhibit WR-8 of Randolph Watsun's direct testimony.

12 The Alternate Route bisects the John Marshall/Leeds Manor Historic District. It skirts the  
13 Crooked Run Valley Historic District, Marshall Historic District, Markham Historic District,  
14 Delaplane Historic District (both within the John Marshall/Leeds Manor Historic District), and  
15 Thoroughfare Gap Battlefield District. The Alternate Route also impacts the proposed  
16 Georgetown Historic District and Goose Creek/Cromwell Rural Historic Districts, both of which  
17 have been determined eligible for listing on the National Register. Please see Exhibit WR-8 of  
18 Randolph Watsun's direct testimony.

19 Fauquier County's location between Richmond and Washington D.C. made it a hotbed of  
20 activity in the Civil War. Recent survey work completed by the National Park Service American  
21 Battlefield Protection Program substantiates larger National-Register eligible battlefield districts  
22 than those represented in the DHR Study. There are also numerous skirmishes and other

1 National Register-eligible Civil War resources, such as hospitals, earthworks, and headquarters  
2 that need to be identified within these routes and impacts studied accordingly.

3 Preliminary evaluations indicate the routes would also impact at least two other known  
4 historic rural areas that are eligible for the National Register. The area along Route 651 and  
5 Fauquier Springs and Remington is rich in river and rural agricultural resources and  
6 demonstrates a currently intact historic rural landscape. The area surrounding the proposed  
7 Bristersburg Historic District is another intact rural historic landscape shaped by its location  
8 within a large swath of prime USDA soils in Southern Fauquier County.

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

10 A. Enactment of The National Historic Preservation Act of 1966 resulted in the creation of  
11 the National Register. Only significant resources with high degree of integrity are eligible for  
12 listing on the National Register. The National Park Service document *How to Apply the National*  
13 *Register Criteria* states, "Historic properties either retain integrity (this is, convey their  
14 significance) or they do not. Within the concept of integrity, the National Register criterion  
15 recognizes seven aspects or qualities that, in various combinations, define integrity." Exhibit  
16 KA-2. These seven aspects of integrity are: location, design, setting, materials, workmanship,  
17 feeling, or association.

18 National Register significance in architecture, archeology, engineering, and culture is  
19 present in districts, sites, buildings, structures, and objects that possess integrity of location,  
20 design, setting, materials, workmanship, feeling, and association and: a) are associated with  
21 events that have made a significant contribution to the broad patterns of our history; or b) are  
22 associated with the lives of persons significant in our past; or c) embody the distinctive  
23 characteristics of a type, period, or method of construction, or that represent the work of a

1 master, or that possess high artistic values, or that represent a significant and distinguishable  
2 entity whose components may lack individual distinction; or d) have yielded, or may be likely to  
3 yield, information important in prehistory or history. Exhibit KA-3.

4 **Q. CAN YOU DESCRIBE, MS. ABE, HOW THE NOMINATION PROCESS IS**  
5 **CARRIED OUT IN VIRGINIA?**

6 A. Communities, local governments, individuals, or consultants pro-actively consult with  
7 VDHR staff to identify significant resources or areas that may be eligible for listing on the  
8 National Register. The applicant for the nomination completes a Preliminary Information Form  
9 (PIF), which includes an architectural description, statement about the significance of the  
10 resource or geographic area, photographs, maps, and a boundary explanation and justification.  
11 The State’s in-house Evaluation Team reviews this PIF. The PIF is forwarded to the State  
12 Review Board that meets quarterly. The State Review Board makes the final determination  
13 whether the resources or area is National Register-eligible. The applicant then proceeds to  
14 complete a full National Register nomination.

15 **Q. ONCE THE NATIONAL REGISTER NOMINATION IS COMPLETED, WHAT**  
16 **HAPPENS NEXT?**

17 A. After the State Review Board approves and reviews the PIF, the applicant for a  
18 nomination begins to compile a full nomination, taking into account suggestions from the Board.  
19 A nomination is essentially structured as proof that a property meets National Register Criteria  
20 for Significance and the level and type of integrity of the resource is sufficient to embody or  
21 reflect this significance. The main office of the VDHR manages the nomination process.  
22 Richmond staff sends a letter to all owners of record and adjacent owners informing them about  
23 the nomination and informing them about a public hearing that will be held in the community.

1 The nomination is then presented to the State Review Board at one of their quarterly meetings.  
2 If the State Review Board approves the nomination, the property is listed on the Virginia  
3 Landmarks Register. However, the National Park Service has final approval authority over  
4 every National Register nomination.

5 **Q. HAS EACH OF THE HISTORIC DISTRICTS THAT MIGHT BE IMPACTED BY**  
6 **THE LOUDOUN LINE BEEN THROUGH THIS NOMINATION PROCESS**  
7 **INCLUDING PUBLIC PARTICIPATION?**

8 A. Yes. All the National and State Nominations are available on-line at:

9 [http://www.dhr.virginia.gov/register/register\\_counties\\_cities.htm](http://www.dhr.virginia.gov/register/register_counties_cities.htm)

10 **Q. IS IT YOUR OPINION THAT THE PROPERTIES ARE OF HISTORIC**  
11 **SIGNIFICANCE AND ARE INTEGRAL TO THE CULTURAL LANDSCAPE OF THIS**  
12 **AREA?**

13 A. Yes. These nominations all undergo extensive scrutiny and review for their conformance  
14 with National Park Service standards. The process culminates in an objective review by the  
15 National Park Service as the final decision-making body that places properties on the National  
16 Register. This process has been followed for all of the historic districts that may be affected by  
17 the Loudoun line alternative proposals. The criterion for significance has clearly been defended  
18 in each case and the limits of the geographic areas representing the significance have been  
19 adequately justified.

20 **Q. PLEASE EXPLAIN THE CONCEPT OF A CULTURAL LANDSCAPE.**

21 A. In its January 26, 2007 letter to the applicant's consultant, Burns and McDonnell, Exhibit  
22 KA-4, VDHR emphasized that the area traversed by the proposed transmission line is a historic  
23 cultural landscape. The concept of a cultural landscape recognizes the relationships between a



1 built environment and the natural environment. A cultural landscape analysis would thereby  
2 more appropriately evaluate whether a transmission line proposal “reasonably minimizes adverse  
3 impact on the scenic assets, historic districts, and environment of the area concerned.” VA Code  
4 § 56—46.1 (provided for convenience at Exhibit KA-5). VDHR strongly recommended the  
5 applicant complete a cultural landscape study meeting National Park Service standards in order  
6 to properly assess adverse impacts. But the applicant did not complete this type of study.  
7 Instead it opted for a disjointed and fragmented analysis of the visual impacts that does not take  
8 into account how all of these resources interrelate within the districts and throughout the study  
9 area.

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

13 A. Yes. The type of impact analysis methodology represented within the DHR Study does  
14 not provide a comprehensive or objective determination of direct and indirect adverse impacts  
15 that will result from construction of the proposed Loudoun line. Moreover, the DHR Study does  
16 not sufficiently address mitigation measures.

17 To begin, the mile-wide buffer area chosen for the visual analysis is arbitrary and fails to  
18 take into consideration topography. The applicant should be required to adhere to standard  
19 National Register evaluation criteria to determine the Area of Potential Effect, as recommended  
20 by VDHR. Exhibit KA-3. The visual analysis should be conducted in the winter rather than the  
21 summer so that the study represents tree cover conditions present during six months out of the  
22 year.

1           The DHR Study features a limited number of vantage points for the historic district visual  
2 evaluations. The vantage points appear to be chosen in order to minimize visual impacts. Many  
3 of the vantage points chosen for the analysis are vantage points internal within the historic  
4 districts, rather than vantage points from edges of the districts in close proximity to the proposed  
5 lines or in areas that reflect the actual use of the resource.

6   **Q.    IN YOUR OPINION, DOES THE DHR STUDY ADEQUATELY REPORT THE**  
7 **IMPACT OF THE LOUDOUN LINE?**

8   A.    No it does not. The study is contrived to show that the transmission lines have a minimal  
9 visual impact on historic and scenic landscapes and towns. The flawed design of the study  
10 allows the applicant to avoid a conclusion that there would be widespread adverse impacts. That  
11 evasion, in turn, allows the applicant to avoid any discussion or presentation of meaningful  
12 mitigation measures. The applicant proposes to use the existing tree cover as mitigation. This is  
13 minimal mitigation based on the false premise that this tree cover on both private and public  
14 land, will in fact remain in place.

15 **Q.    ARE YOU AWARE OF ANY SPECIFIC GEOGRAPHIC AREA WHERE THE**  
16 **PROPOSED LOUDOUN LINE WOULD HAVE AN IMPACT?**

17   A.    Yes, as a planner in Fauquier County I am familiar with historic resource issues,  
18 comprehensive planning issues, and development issues throughout the entire county. As the  
19 lead staff person for historic preservation issues and projects, I am charged with implementing  
20 Comprehensive Plan goals for historic preservation. Implementation involves continued  
21 documentation, improving accessibility to historic data, promotion of tax credit programs, and  
22 the development of other preservation techniques and programs.

1 **Q. CAN YOU DESCRIBE FAUQUIER COUNTY?**

2 A. Yes. Fauquier County is located approximately 40 miles west of the Nation’s Capital in  
3 northern Virginia. It is roughly rectangular in shape and covers approximately 660 square miles.  
4 The County is bounded to the west by Culpeper and Rappahannock counties, to the south by  
5 Stafford County to the north by Loudoun, Warren, and Clarke counties, and to the east by Prince  
6 William County. The County spans three geological provinces — the Blue Ridge, the Culpeper,  
7 and the Piedmont. The northwestern half of the County, dominated by the Blue Ridge, is  
8 characterized by mountainous and rolling terrain. The central portion, dominated by the  
9 Culpeper Basin, is nearly level to gently rolling. The extreme southeastern portion, dominated  
10 by the Piedmont, is gentle rolling to rolling.

11 Fauquier County abounds with a rich array of historical and cultural resources that are  
12 records of a unique past shaped by nature, politics, economics, and human behavior. Numerous  
13 layers of human and natural history are encased in Fauquier County’s landscapes. For almost  
14 10,000 years this terrain was home to Native Americans; their lives and advancements are  
15 largely recorded as archaeological artifacts within the earth itself. When Europeans settled this  
16 area approximately 300 years ago, they began a process of rapid transformation of the landscape  
17 and the construction of buildings within these refashioned landscapes, many of which are now  
18 historically significant.

19 **Q. PLEASE DESCRIBE THE FAUQUIER COUNTY COMPREHENSIVE PLAN**  
20 **AND ITS SIGNIFICANCE?**

21 A. Fauquier County’s Comprehensive Plan channels growth into the County’s nine service  
22 districts, away from rural and village areas. The Comprehensive Plan designates approximately  
23 90% of the County for rural uses. The Zoning Ordinance requires clustered development in rural

1 areas. These governmental measures have resulted in a high degree of rural conservation and in  
2 turn fostered privately initiated rural conservation efforts that have preserved approximately  
3 82,000 acres in permanent easements. The amount of permanently preserved rural land  
4 continues to increase as more historic districts and other scenic designations are established that  
5 raise public awareness about these unique assets. The County’s official motto is “Progress with  
6 Reverence for Heritage.”

7 **Q. CAN YOU DESCRIBE THE POPULATION OF FAUQUIER COUNTY?**

8 A. Yes. Fauquier County’s 66,000 residents are an eclectic mix of professionals, trades  
9 people, farmers, horse enthusiasts, families and individuals. Based upon election results most  
10 appreciate and support efforts for retaining the rural character of the county and the associated  
11 small town ambiance. With intensive suburban development at the county’s doorsteps, there is  
12 increased public awareness that the county’s plan to preserves its scenic and historic rural  
13 character provides *all* of its residents with a higher quality of life.

14 **Q. WHAT VALUES ARE EXPRESSED IN THE COMPREHENSIVE PLAN?**

15 A. Comprehensive Plans embody a community’s visions and desires for the present and for  
16 the future. Fauquier County’s Comprehensive Plan is not a static document but rather a central  
17 living policy document and framework that continues to undergo changes and refinements.  
18 Many of these refinements continue to strengthen and expand rural land preservation  
19 opportunities.

20 As noted in Chapter One of the Comprehensive Plan throughout Fauquier County’s  
21 Planning History, the acknowledged importance of traditional agricultural uses, rural lifestyles,  
22 historic sites and areas, unique open spaces, and preservation of its environment has shaped the

1 county’s planning goals and guided development. These goals have been incorporated in various  
2 forms in the Comprehensive Plan. Exhibit KA-6.

3 **Q. COULD THIS COMPREHENSIVE PLAN BE A REACTION TO THE**  
4 **PROPOSED LOUDOUN LINE?**

5 A. Not at all. The Fauquier County Comprehensive Plan has promoted rural preservation  
6 since it was first drafted in 1967. It continues to respond to threats to the rural and scenic  
7 heritage posed by industrial and suburban development emanating outward from Washington  
8 D.C. The 1986 version of the Comprehensive Plan increased the amount of land designated for  
9 rural preservation by reducing the size of areas slated for additional development. The county  
10 later enacted a sliding scale zoning ordinance requiring residential development to be clustered  
11 on 15% of the area of a parcel in rural zones.

12 **Q. CAN YOU DESCRIBE OTHER WAYS THAT THE COMPREHENSIVE PLAN**  
13 **REFLECTS A DELIBERATE ATTEMPT TO GUIDE THE DEVELOPMENT OF THE**  
14 **COUNTY TO ENHANCE ITS SCENIC CHARACTER?**

15 A. The Fauquier County Comprehensive Plan specifies the goal “To recognize the County’s  
16 traditionally agricultural and rural character and the need for preservation of its open spaces and  
17 scenic beauty.”

18 Chapter 8 synthesizes all of other Comprehensive Plan elements and principles within a  
19 chapter that focuses on rural land use. Exhibit KA-7. Chapter 8 itemizes a number of measures  
20 that the County should undertake to achieve rural land preservation. Exhibit KA-7. The  
21 Comprehensive Plan is successfully implemented as evidenced by the existence of so many areas  
22 eligible for the National Register. These villages and rural areas would not be eligible for listing  
23 if the intact historic scenic settings did not retain such a high level of integrity.

1 Chapter 8 also discusses how the goals to preserve scenic and historic rural lands work in  
2 tandem with Comprehensive Plan goals to direct new development into nine towns, called  
3 Service Districts. Exhibit KA-7. The Comprehensive Plan designates discernable edges for each  
4 Service District and these boundaries are implemented through ordinances that limit public water  
5 and sewer within Service District areas. Exhibit KA-7. This overall land use pattern was chosen  
6 to allow for a reasonable amount of growth that did not destroy the county's overall agricultural  
7 and rural scenic character.

8 **Q. ARE THERE OTHER SCENIC ASSETS IMPACTED BY THE LOUDOUN LINE**  
9 **PROPOSALS?**

10 A. Yes. Jurisdictions throughout Virginia work with appropriate state agencies to  
11 establish state scenic roads and scenic rivers. Rappahannock River and Goose Creek are two  
12 rivers in Fauquier County designated as State scenic river shows the Alternate and Preferred  
13 Routes in relationship to State Scenic Roads within Fauquier County. The Burns & McDonnell  
14 Routing Study did not identify these assets. Please see Exhibit WR-9 of Watsun Randolph's  
15 direct testimony.

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

18 A. Yes. The Code of Virginia grants authority to Virginia localities to protect historic  
19 resources through comprehensive planning, subdivision and zoning ordinances, and a variety of  
20 voluntary programs. Fauquier County's Comprehensive Plan and implementing ordinances  
21 serve as the foundation for the County's overall historic preservation programs and rural  
22 conservation programs.

1           Fauquier County embarked on a multi-year program to document approximately twenty-  
2 one villages and towns that were deemed eligible for listing on the Virginia Landmarks as a  
3 result of the Final Report for Survey Update of Historic Properties in Fauquier County, Virginia  
4 (March 20, 2002 Maral Kalbian, Architectural Historian, for the Fauquier County Board of  
5 Supervisors.) The county’s efforts are being complemented by privately funded and community-  
6 initiated nominations for rural areas qualified for listing as Rural Historic Districts. If all the  
7 areas currently eligible to be listed on the National Register are in fact listed, Fauquier County  
8 residents may establish the largest inventory of National Register Districts in the Virginia  
9 Commonwealth.

10           Additionally, in 2006 the county initiated a long-term citizen-based planning effort to  
11 protect its significant Civil War resources with an initial focus on 12 battlefields classified in the  
12 top 384 most important battles in the Civil War. In 2007, the county obtained a grant for a  
13 comprehensive Civil War Battlefield Public Education project with the goal to build and  
14 strengthen the capacity for community level preservation planning involving property owners,  
15 interested citizens, and historians. The county has the goal to promote this type of citizen-based  
16 planning approach for all of its preservation activities.

17 **Q.     IN ADDITION TO THE GOVERNMENT, ARE THE RESIDENTS ACTIVE IN**  
18 **THIS EFFORT?**

19 A.     Citizen groups and individuals are very active in Fauquier County government. Citizens  
20 for Fauquier County, Piedmont Environmental Council, Goose Creek Association, Southern  
21 Fauquier Historical Society, the Afro-American Historical Association, the Mosby Heritage Area  
22 Association, and the Journey Through Hallowed Ground are some of the larger organizations.

1 These groups work in connection with elected officials and county staff in an ongoing process to  
2 implement the Comprehensive Plan goals and refine ordinances to achieve those goals.

3 Additionally, all Fauquier County groups and residents are active and encouraged to be  
4 active in the county's land planning and land development review processes. Because the  
5 county's population is relatively small, residents have direct access to local elected officials, the  
6 Planning Commission, and other boards and committees. Citizens are actively involved in the  
7 entire planning process.

8 Again, the number and size of the geographic areas eligible for listing on the National  
9 Register attests to longstanding resident participation and support for rural and historic  
10 preservation.

11 **Q. ARE YOU FAMILIAR WITH HOW THE COMPREHENSIVE PLAN CAME**  
12 **INTO BEING?**

13 A. The Comprehensive Plan contains a section on the history of the development of the Plan  
14 so the public can understand the steps that were taken to create the current document. Fauquier  
15 County, Clarke, and Rappahannock Counties have all adhered to a vision for a rural land plan.  
16 These three counties established appropriate zoning ordinances to implement these rural visions.  
17 The 1977 Fauquier County Comprehensive Plan established the earliest clearly defined  
18 objectives to preserve the county's historic, agricultural character, its natural beauty, and  
19 sensitive environmental areas, resulting in a proposed Land Use Plan that increased the areas of  
20 agricultural use and reduced the designated Service Districts. Exhibit KA-6. Later plans and  
21 ordinances in the mid-to-late 1980s strengthened implementation through the enactment of a  
22 rural zoning ordinance. The last 15 years have also witnessed citizen approval for down-sized  
23 Service Districts within Fauquier County. Exhibit KA-6.



1 **Q. DO YOU BELIEVE THAT THE PROPOSED TRANSMISSION LINE IS**  
2 **CONSISTENT WITH THE GOALS EXPRESSED BY THE COUNTY AND ITS**  
3 **RESIDENTS?**

4 A. No. The proposal by Trans-Allegheny Interstate Line Company/Dominion to expand a  
5 power line across the entire northern or southern portions of the county is unwarranted and  
6 typifies the type of intrusion that the county and its citizens have worked to prevent for over  
7 thirty years. This is particularly an affront to jurisdictions like Fauquier County that have  
8 enacted responsible land plans allowing limited amounts of growth and development with  
9 minimized impacts on natural resources, energy resources, and regional and local public  
10 infrastructure. The Loudoun line would also conflict with the state sanctioned scenic easements  
11 and Historic Districts.

12 **Q. DOES YOUR VIEW TAKE INTO ACCOUNT THAT THE PREFERRED ROUTE**  
13 **FOLLOWS EXISTING TRANSMISSION LINES IN FAUQUIER COUNTY?**

14 A. Yes. While the application indicates that the Preferred Route follows an existing route of  
15 transmission towers, the existing transmission and the proposed Preferred Loudoun line differ by  
16 orders of magnitude. Whereas the existing towers are wooden and 35 feet tall. The new  
17 Loudoun line towers would be steel lattices reaching 120 to 140 feet into the view shed. The two  
18 simply are not comparable. These proposed towers would have a much more intrusive effect on  
19 a landscape with low rolling hills and flat farmlands. The proposed towers would be visible  
20 from a greater distance within this terrain than the current structures.

21 **Q. SHOULD OTHER REVIEWS BE DONE BEFORE CONSIDERING THE**  
22 **IMPACT OF THE PROJECT ON THE SCENIC ASSETS AND HISTORIC**  
23 **RESOURCES?**

1 A. It is imperative that the impact analysis for all of the power line alignments within  
2 Fauquier County include an analysis of impacts on historic areas and resources that are not yet  
3 listed on the National Register but are eligible for listing. The impact analysis also needs to  
4 consider scenic roads and rivers, as well as the impact of this line within the Journey Through  
5 Hallowed Ground project area. The DHR Study does not contain any reference to these scenic  
6 river and road designations.

7 **Q. DO YOU HAVE ANY OTHER OBSERVATIONS ON THE IMPACT ON**  
8 **FAUQUIER COUNTY?**

9 A. Fauquier County has responsibly planned for a balanced amount of growth and  
10 preservation on the outer fringes of the Washington D.C. suburbs. The county's land use plan  
11 for nine towns and rural conservation outside these towns is a tried and tested classical land plan  
12 that respects the county's rural heritage as well as the history of its towns and villages. The  
13 county's plan is fiscally responsible to the extent that growth areas are contained and compact,  
14 providing for the efficient delivery of public services and utilities.

15 The county's land use plan also functions as both a natural resource plan and an historic  
16 preservation plan. Development is limited within the rural areas. Land preservation fosters more  
17 historic preservation since historic buildings are best and most effectively preserved when they  
18 are retained in their historic settings.

19 **Q. THANK YOU, MS. ABE, NO FURTHER QUESTIONS.**