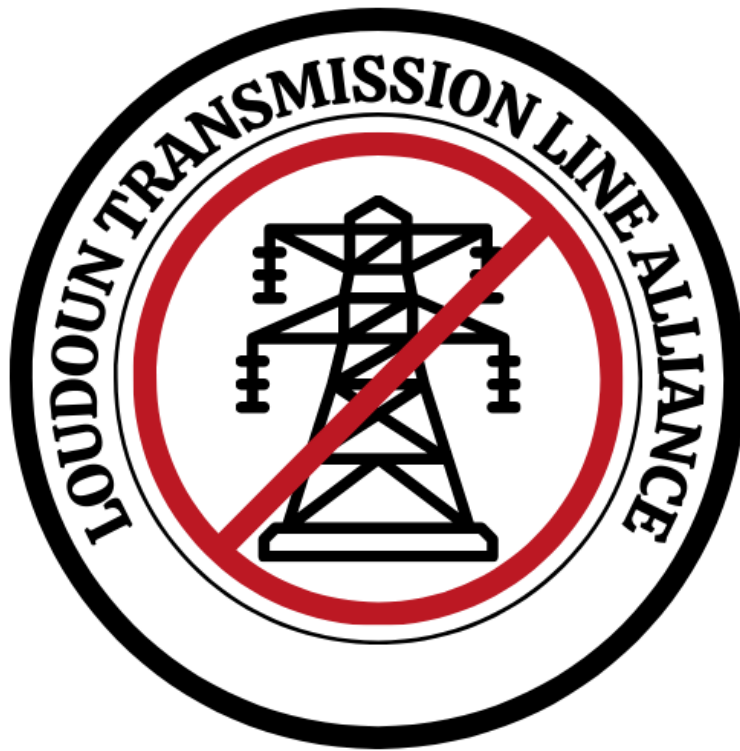


# **The Loudoun Transmission Line Alliance**

**Report on Local Impacts of the Electric Transmission Line  
Through Rural Loudoun County, Virginia, as proposed by  
NextEra Energy Transmission MidAtlantic, LLC**

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**June 20, 2024**

**FIRST EDITION**

**Disclaimer:** The authors assume no responsibility or liability for any errors or omissions in the content of this report. The information contained in this report is provided on an "as is" basis.

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## Purpose Of the Loudoun Transmission Line Alliance

1. **To support** the overall PJM Regional Transmission Expansion Plan (RTEP) to *inter alia* supply the rising power needs of the region's data center industry;
2. **To firmly oppose** a new transmission path anywhere in Rural Loudoun County and request that NextEra Energy withdraw its proposal to this effect; and
3. **To seek the agreement** of NextEra, in conjunction with other energy companies concerned, to select a readily available existing right of way to support implementation of the RTEP.





# **The Loudoun Transmission Line Alliance**

## **Report on Local Impacts**

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## Executive Summary

***“For NextEra, this is a commercial decision, but for Loudoun it’s existential. We call for no new power corridors in rural Loudoun!” – LTLA Declaration***

One of Loudoun County’s most noteworthy features and a source of immense pride to its citizenry is the preservation of the County’s rural economy, its historic sense of place, and its natural beauty. Intense civic participation in support of such preservation and conservation is deeply rooted here. In 1942, for instance, Loudoun County became the first rural county in the country to pass a zoning ordinance against billboards after the Leesburg Garden Club championed the cause. Dozens of volunteer organizations have picked up the torch since then to guard Loudoun’s character.

It is not surprising to anyone who has worked or lived in Loudoun that the announcement by NextEra Energy and PJM Interconnection of its intention to construct an immense new power corridor through the heart of Rural Loudoun *has generated an extraordinary outcry!*

### **The Loudoun Transmission Line Alliance (LTLA)**

The LTLA is a direct outgrowth of local citizen advocacy and originated even before the PJM Board met on December 11, 2023 to approve a preliminary proposal by NextEra Energy to put 500 kV transmission lines through Rural Loudoun as part of the PFM Regional Transmission Expansion Plan. In the limited time allowed for comment before the meeting, more than 300 letters were submitted by Loudoun organizations in a matter of days. Since then, 43 Rural Loudoun organizations representing local communities, business, heritage and environmental preservation, and more than 2,200 individuals now compose the LTLA. They have joined together as signatories of a Declaration that:

1. *Strenuously* opposes construction of a new “greenfield” powerline corridor;
2. Highlights its likely damage to the local economy, heritage and environment; and
3. Calls on NextEra to choose an alternative route that minimizes harm along existing rights of way.

The LTLA is chaired by Susan Manch, President of the Waterford Foundation Board of Directors, and is guided by a Strategy Working Group that represents a wide range of interests in Rural Loudoun County. See more about the Alliance on page 10 of this Report.

Significant citizen activism has also helped to trigger a vigorous response from the Loudoun County Government, which on April 16, 2024 *unanimously* declared its opposition to a new route through Rural Loudoun and encouraged NextEra to work with the region’s electric utility providers to co-locate the new transmission line in existing electrical transmission corridors. See more on page 50 of this Report.

## **Impacts on Rural Loudoun**

The 2019 General Plan of Loudoun County calls for Rural Loudoun (known as the Rural Policy Area) to be an enduring rural landscape of working agricultural lands, rural economic uses, and limited residential development. It includes policies that *protect* the landscape, economy, historic resources, and the existing community character. Against this benchmark, the LTLA has compiled a set of local impact statements from member organizations and individuals that testify to the *very likely damage* that a greenfield NextEra line would inflict *wherever* it might be located in Rural Loudoun.

These impacts are summarized starting on page 16 of this Report, and organized by community and by subject – heritage, rural economy, and the environment. They are supplemented in the main text by a series of maps to illustrate the *density* of historical, economic, and natural resources in Rural Loudoun that would suffer irreparable damage and are *unlike* many locations in the U.S. where utilities are building high-voltage power lines.

This mapping reflects:

- Over 20,000 households, including centuries-old farmsteads and related structures that pre-date the American Revolution;
- Prime agricultural soils, agricultural and forestal districts, 4,426 conservation or preservation easements, parks and trails, and open spaces;
- A robust equine, winery, brewery, cidery, heritage and B&B rural business sector;
- River and stream corridors, protected watersheds, flood plains, wetlands, wildlife and native plants habitats, and limestone and mountain overlay districts;
- Seven historic districts and six National Historic Landmarks, villages and rural roadway networks, churches, and historic cemeteries and burial grounds;
- Well-documented African American heritage sites and designated historic areas such as the Journey Through Hallowed Ground National Heritage Area, the Appalachian Trail, and the Potomac Heritage Trail; and
- Public facilities such as schools, community centers, and telecom and safety facilities.

The full set of impact statements may be found in Annex 2 (page 60) and Annex 3 (page 123).

***Impacts on Rural Communities.*** The report illustrates likely impacts on four representative Loudoun rural communities. In the *Lovettsville Area* – incorporated nearly 200 years ago -- the proposed NextEra route would cut through highly productive farmland, wetlands and natural habitats, and rural properties and residential neighborhoods, including equestrian facilities and businesses that depend on preservation of the rural landscape. The *Hamilton Station Road Area* consists of some 200 residential, agricultural, and commercial entities, many dating from pre-Civil War times. The area includes many individual historic properties, farms, and farmettes that contribute significantly to agritourism in Rural Loudoun. The *Mt. Gilead, Digges Valley, and the Goose Creek Historic District Area* covers land originally settled by Quakers in the mid-18<sup>th</sup> century, whose local economy relies on rural tourism and agriculture. The proposed power transmission line would undermine this and the conservation easement system that preserves open

land against pressure from housing and other developments while protecting natural resources such as forests, wetlands, streams, wildlife, and prime agricultural soils. The 1,420-acre National Historic Landmark of *Waterford* continues today as a living village and historic treasure that is the best known, but by no means the only example, of Loudoun's extraordinary heritage riches. The area was first settled by Quakers in 1733 and quickly became known for agriculture, milling and tradecraft that remain visible today. The proposed transmission line would traverse and threaten the Virginia Outdoor Foundation easement-protected Phillips Farm owned by the Waterford Foundation and disrupt a natural habitat teeming with wildlife and hedgerows. The Foundation currently hosts as many as 60,000 visitors to Waterford each year, including students who attend programs on Reconstruction and African American history. The Waterford Annual Historic Crafts Fair draws some 15,000 individuals each year and is one of the primary means of financial support for the Foundation, which annually spends \$500,000 on educational and preservation activities.

***Impacts on the Rural Economy, Heritage, and the Environment.*** Despite heavy developmental pressures, the number of Loudoun's farms is actually growing, up 6% from 2017-2022 to 1,332; their market value in that period grew even faster to about \$50 million. Loudoun agriculture is highly diverse in both product and ownership. It ranks #1 in Virginia in veteran farmers and #2 in women farmers. Loudoun's agriculture is highly competitive, benefitting from the presence of rich prime soils and ranks #1 or #2 in Virginia in many products, such as cut flower sales, equine farms, grape production, honey production, Christmas trees, and goat and llama farms. Their loss would be irreplaceable and would destroy today's precious economic diversity of the County.

Loudoun's agritourism industry relies heavily on well over one million visitors per year that are drawn to these very assets. Over 50 *local wineries* are widely recognized for their high quality and multiplier effects that produce additional business such as wedding events. Destruction of natural landscapes and view sheds would devastate this environmentally very friendly industry. Over 30 *breweries* also depend on such vistas and enjoy a booming business. Together, the wineries, breweries, distilleries and cideries account for about \$118 million in revenue per year and many thousands of jobs. Many area *B&Bs* also thrive as part of these rural industries and would go out of business in the proximity of new giant power lines. Loudoun's *equine industry*, with some 14,000 horses (#1 in Virginia), creates revenues of about \$180 million and attracts some 78,000 spectators from around the world to equestrian events each year. Thousands also come to Loudoun – by foot, horse, and bike – to navigate hundreds of miles of its *unpaved road network* and *linear pathways*.

It is also *vital* to appreciate the vast array of assets that cannot be readily monetized. What price can be put on a National Historic Landmark like Waterford and other historic villages in Loudoun, or on Oak Hill, the former plantation and residence of President Monroe? What price can be put on the County's spectacular landscapes that draw so many residents and visitors here? And what price can be put on the rich farmlands in the "Between the Hills" valley that separates the Blue Ridge and Short Hill Mountain that would still be recognizable to George Washington and Thomas Jefferson, who as young surveyors passed through here on the way to the Ohio territory in the 18<sup>th</sup> century?

*The loss of the character, business, historic heritage and open spaces of Rural Loudoun would condemn all of Loudoun County to mass development.*



## **LTLA Conclusions**

The LTLA understands that a successful transmission line project would need to meet the requirements of five bodies: The Virginia State Corporation Commission (SCC), the PJM Interconnection Board, the Virginia Department of Historic Resources, the Virginia Department of Environmental Quality and the Virginia Outdoors Foundation. The LTLA assessment of the extent to which these requirements can be met follows.

### **1. SCC Standards**

**The LTLA finds that NextEra’s proposed line through Rural Loudoun, though well-intended, suffers from three critical weaknesses and will not meet the standards of the Virginia SCC:**<sup>1</sup>

- ***The NextEra proposal fails to avoid or minimize negative effects on economic development in Loudoun County and the Commonwealth.*** The effects on agricultural, equine, hospitality, and tourism economic development in Rural Loudoun would be extremely negative and would be substantially alleviated or altogether eliminated by following existing rights of way.
- ***The NextEra proposal fails to avoid or reasonably minimize adverse impacts on scenic assets, historic resources, and the environment of the Rural Loudoun area.*** In no way does the NextEra proposal meet this standard as it would heavily affect residential communities, agricultural and forestry districts, open space and conservation easements, and other environmental and heritage resources.
- ***The NextEra proposal fails to give adequate consideration to the use of existing rights of way.*** The proposal for a greenfield line runs counter to the presumption that preference will be given to locating any new facilities on, over, or under existing easements or ROWs. The LTLA believes that this NextEra proposal would slow, not speed, realization of the Reliability Project and result in greater cost than use of existing ROWs.

### **2. Supporting PJM Evaluation**

In granting its approval of the preliminary routing by NextEra, *PJM recorded the following very significant reservations:*<sup>2</sup>

- **Environmental Review** – “The proposed route for this greenfield line segment (10C3) goes through highly developed residential and commercial developments, as well as state and local conservation easements. This route also crosses the Washington & Old Dominion (W&OD Trail), a regional park in northern Virginia. ***There is significant risk***

---

<sup>1</sup> See Annex 5 for key VA Code references upon which this assessment is based: 56.46.1 (A), (B) and (C)..  
<https://law.lis.virginia.gov/vacode/title56/chapter1/section56-46.1/>

<sup>2</sup> PJM Constructability and Financial Analysis, November 17, 2023, and PJM Reliability Analysis Update, October 3, 2023.

***of public opposition to the proposed route, which may lead to rerouting this segment along the existing corridor from Doubs to Goose Creek.*** Overall, for Proposal 853, medium-high constructability risks are assessed for the proposed line routes due to anticipated lengthy regulatory process, potential public opposition, construction difficulty, environmental constraints and property acquisition, which may have significant impacts on the cost and schedule for the proposed project.”

- **Cost Review** – *Independent cost assessment estimates the total project proposal at \$1,195 million, nearly twice the NextEra estimate of \$683 million.* Of this, and similarly, the transmission line Segment 2 from Woodside to Goose Creek is estimated at \$114 million versus \$58 million, respectively.
- **Schedule Review** – “The proposed in-service date of June 2027 is very aggressive for the proposed scope of the project considering the significant permitting and land acquisition challenges associated with the proposed 500 kV greenfield line routes through four states. Overall, the schedule risk is considered medium-high.”

### **3. Supporting Virginia State Agency Requirements**

This project will be benchmarked against the standards and reviews of, at least, the Department of Historic Resources (DHR) the Virginia Outdoors Foundation (VOF), and the Department of Environmental Quality (DEQ). Each of these reviews is governed by Virginia Codes that specify what may or may not be done.

- An example of how the current proposed pathway does not meet the standards of this review process is the plan to route the lines through the Waterford Foundation property which is eased by the Virginia Outdoors Foundation (VOF). The VOF was founded after passage of the Open Space Land Act, Virginia Code 10.1 – 1700 – 1705.1.<sup>3</sup>
- When VOF agrees to hold an open-space easement, it makes a permanent commitment to enforce the deed restrictions in order to protect the property’s conservation values. These restrictions apply to the original donor and all future property owners. VOF views easement enforcement as a partnership between VOF and landowners.
- In the event of a potential or actual easement violation, VOF has a legal obligation to enforce the easement and protect its conservation values.<sup>4</sup>

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<sup>3</sup> <https://law.lis.virginia.gov/vacode/title10.1/chapter17/>

<sup>4</sup> <https://www.vof.org/protect/easements/stewardship/>

# **1. The Loudoun Transmission Line Alliance (LTLA)**

**Origin** – The foundation of the Loudoun Transmission Line Alliance arises from partnerships between local community, business, heritage and environmental preservation organizations that oppose the PJM Interconnection Board preliminary approval on December 11, 2023 of a proposal by NextEra Energy to build a 500 kV transmission line through Rural Loudoun. In a matter of days before the PJM meeting, opposition was originally expressed in more than 300 letters to PJM from a wide range of Loudoun residents and organizations. They may be reviewed here:

<https://www.pjm.com/m/Search%20Results.aspx?q=letters%20received&t=coveo4A2453FD>.

Despite this initial opposition, the proposal was approved by PJM, leading the Waterford Foundation to launch an initial petition to gauge continued public opposition. With a strong positive response, the Piedmont Environmental Council, Waterford Foundation, Inc., and Loudoun Conservation and Preservation Coalition joined together to co-host a meeting on February 2, 2024 in which the Loudoun Transmission Line Alliance was formed between the initial 25 organizations attending.

**Purpose** – The purpose of the LTLA is codified in a one-page **Declaration** (renamed from the original “Petition” and included below on page 12 that (1) strenuously opposes construction of a “greenfield” line in western Loudoun, (2) summarizes the major damage that it would cause to the area’s ecology, economy, community, and heritage, and (3) calls on NextEra to withdraw this proposal and place its line on existing rights of way.

**Composition** – The LTLA is growing as word spreads of the proposed transmission line and - as of May 31, 2024 - is composed of and supported by the following:

- **More than 2,200 individuals** who have signed the Petition and Declaration – most of whom reside in Rural Loudoun, but many of whom are from -
  - Eastern Loudoun (*e.g.*, Ashburn, Sterling, and Chantilly), and neighboring areas in Northern Virginia (Alexandria, Arlington, Falls Church, Gainesville, Haymarket, Herndon, Reston, Vienna); and
  - Nearby states of Maryland, DC, West Virginia, North Carolina, and Pennsylvania; *and*
- **43 local and regional organizations, multiplied by their thousands of members and employees** that are dedicated to business, heritage and ecological preservation, and community management – see the member list on the next page.

**Guidance** – The LTLA is guided by a 10-member Strategy Working Group that represents the wide range of interests of Rural Loudoun County. The LTLA is chaired by Susan Manch, President of the Waterford Foundation Board of Directors. The Communications Chair is Abigail Zurfluh, Historic Preservation Director for the Waterford Foundation.

| <b>Loudoun Transmission Line Alliance – 43 Member<br/>And Support Organizations</b> |                                        |
|-------------------------------------------------------------------------------------|----------------------------------------|
| Aldie Heritage Association                                                          | Loudoun Therapeutic Riding             |
| Between the Hills Conservancy                                                       | LTLA Lovettsville Community Chapter    |
| Bluemont Citizens Association                                                       | Loudoun Wildlife Conservancy           |
| Catoctin Creek Scenic River Committee                                               | Loudoun Wineries & Wine Growers Assoc. |
| Data Center Work Group, LCPCC                                                       | Nautical Bowls Leesburg                |
| Destination Stewardship Center                                                      | Northern Virginia Conservation Trust   |
| Etten’s Eden- Nursery, Cut Flower Farm                                              | Old Dominion Land Conservancy          |
| Equine Spirit LLC DBA Ardent Equestrian                                             | Old Wheatland Estates HOA              |
| Friends of the Blue Ridge Mountains                                                 | Rockland Farm LLC                      |
| Golden Springs Alliance                                                             | Rosemont Farm at Trevor Hill HOA       |
| Goose Creek Association                                                             | Save Rural Loudoun and its Foundation  |
| Hamilton Station Road Coalition                                                     | Scenic Loudoun Legal Defense           |
| Hillsboro Preservation Foundation                                                   | Terra Nebulo Winery                    |
| Laurel Hill Farms                                                                   | Unison Preservation Society            |
| Leesburg Garden Club                                                                | Velo Pigs Cycling Club                 |
| Loudoun Bed & Breakfast Guild                                                       | Virginia Piedmont Heritage Area Assoc. |
| Loudoun County Brewers Association                                                  | Waterford Citizens’ Association        |
| Loudoun County Heritage Commission                                                  | Waterford Foundation Inc.              |
| Loudoun Equine Alliance                                                             | Watermark Woods- Native Plants         |
| Loudoun’s Future PAC                                                                | Windswept Farm                         |
| Loudoun Historic Village Alliance                                                   | Wyant Farm Associates                  |
| Loudoun Preservation Society                                                        |                                        |

# The LTLA Declaration

## **Declaration by the Loudoun Transmission Line Alliance on the NextEra Proposal**

We, the undersigned stakeholders, representing business, preservation, agricultural, environmental, and community organizations in Loudoun County, Virginia, call upon **NextEra Energy to avoid building a new power corridor through rural Loudoun County**, in view of the negative impact of such construction on the agricultural community, local economy, heritage and natural resources, and residents of the region.

**We strenuously oppose construction of new “greenfield” lines in rural areas of the County. All new transmission lines should be located within *existing* power corridors – which we understand would be acceptable to PJM.**

- We also request that NextEra utilize existing rights of way and alternative methods, such as advanced conductors and the use of underground lines in highly populated areas, in order to meet the power needs of Loudoun’s data center industry.

**As currently configured, the proposed route will cause major collateral damage to existing local businesses, notably in the agricultural and tourism sectors, as well as to residential valuations.** Power corridors must be sited to minimize the impact on existing businesses, including those dependent on intact open landscapes.

- Loudoun County remains a thriving agricultural region, with 1,332 farms accounting for \$50 million in sales in 2022 alone. Moreover, Loudoun’s thriving equine industry has an annual economic impact of \$180 million.
- The proposed lines also threaten Loudoun’s \$4 billion tourism industry, including \$400+ million in agritourism alone. Surveys show that the County’s landscapes, farms, wineries, breweries, and historic sites are a major draw for visitors.
- **NextEra must account for its damage to these vital sectors of the economy.**

**Historic and environmental sites, including landscapes, define the distinctive heritage of Loudoun County. In no instance should power corridors transit through or near National Historic Landmarks, historic districts, and other properties under conservation or preservation easements.**

- Loudoun boasts six National Historic Landmarks, seven county historic districts, and 4,426 easements that safeguard important environmental and historic sites.
- Conservation and historic preservation easements are legal deed restrictions that in Loudoun, are very site-specific and hence cannot be exchanged for uneased property. Easement holders will vigorously defend these protections as any plan ignoring these protections will undermine the sanctity of easements state-wide.
- A noteworthy example of local, state, and federal historic and environmental protections at risk is the Waterford National Historic Landmark. Waterford’s 1,420 acres are a rare instance of a fully intact 19th century community with scores of protected historic properties, agricultural land, natural habitats, and open spaces.
- **New transmission corridors in rural Loudoun would directly threaten a number of eased sites, as well as prime farmland, waterways, habitats, open spaces, and historic properties.**

**For NextEra, this is a commercial decision, but for Loudoun it’s existential. We call for no new power corridors in rural Loudoun!**

## 2. Project Description

The “2022 RTEP (Regional Transmission Expansion Plan) Window 3” aims to respond to new and mainly data center demand of up to 7,500 MW. One MW equals about 800 homes of electricity supply and the current demand is the equivalent of **6,000,000 homes**. The project aims to be in service by June 1, 2027.

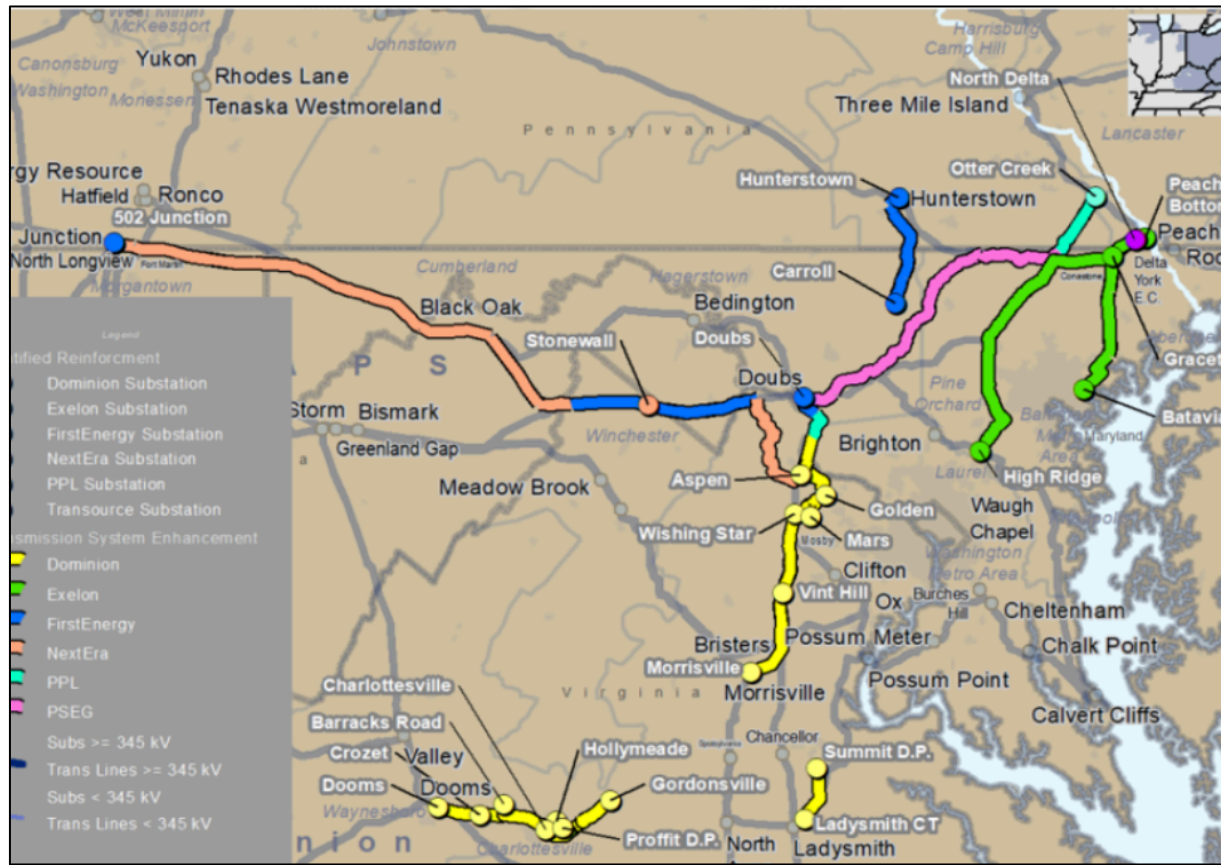


Figure 1a – NextEra Proposal 853 (Source: PJM Constructability Analysis, 11/23/2023).

On December 11, 2023, the Transmission Expansion Advisory Committee of Pennsylvania-New Jersey-Maryland Interconnection, LLC (PJM) <sup>5</sup> approved NextEra's proposal to build about 167 miles of 500 kV transmission line from First Energy's 502 Junction substation in southwestern Pennsylvania, down through West Virginia and Maryland in parallel with existing 500 kV and 230 kV transmission lines to what would be a new NextEra substation north of Winchester (Woodside).

<sup>5</sup> PJM, The Pennsylvania – New Jersey – Maryland Interconnection, LLC is headquartered in Valley Forge, PA and is a regional transmission organization that integrates electric utility transmission systems across all or part of 13 states and DC. It is the largest such network in the US.

From there, the line would continue through Jefferson County in West Virginia and over the Blue Ridge and Short Hill Mountain into western Loudoun County. NextEra would then continue the proposed line by cutting diagonally across western Loudoun County in a new "greenfield" right of way, passing south of Leesburg to reach the new Aspen substation to be built by Dominion Energy.

In the middle of this proposed line cutting through Frederick County in Virginia, Jefferson County in West Virginia, and a shorter segment in northern Loudoun County (see blue segment on the map) is about 37 miles where First Energy will do the work instead of NextEra, replacing First Energy's existing 138 kV transmission line with a set of double-circuit towers carrying both 500 kV and 138 kV conductors.

This First Energy segment runs in parallel with an existing Dominion 500 kV line. NextEra refers to its divided portion of this work (the orange segments of about 130 miles) as the Mid-Atlantic Resiliency Link. (Note that the two companies will be submitting their sections of the overall transmission line separately to each of the affected states, complicating efforts by the public to participate in the regulatory process).

**Alternative Route.** During the 2022-RTEP-Window 3 process, PJM acknowledged that this line would be particularly contentious given the environmental and historical sensitivities of western Loudoun County. PJM went so far as to suggest an alternative route that would continue along the existing transmission right of way shared by First Energy's 138 kV line and Dominion's 500 kV line from Short Hill Mountain in Loudoun County to the Doubs substation in Maryland.

From Doubs, the alternative path would then run parallel to the Potomac River along an existing transmission corridor and cross back into Virginia at Edwards Ferry and continue southward to what will be the new Aspen substation. Under the overall PJM plan, this corridor between Doubs and Aspen is already being upgraded from a single 500 kV line combined with a dual-circuit 230 kV transmission line into a pair of dual-circuit transmission lines, each carrying both 500 kV and 230 kV conductors.

**NextEra Timetable** – NextEra has indicated that it is currently undertaking a detailed analysis of the options for a path through Rural Loudoun that is expected to be completed in June-July 2024 and presented to Loudoun community stakeholders in the fall of 2024, precedent to its presentation of its application to the Virginia SCC before the end of 2024.



**NIETC.** Meantime, a newly proposed and highly impactful federal transmission designation called the Mid-Atlantic National Interest Electric Transmission Corridor (NIETC), would stand to overstep authority for transmission siting by the Virginia SCC and that in a wider geography across Pennsylvania, Maryland and West Virginia as well. The proposed Mid-Atlantic corridor includes multiple parallel paths, each approximately two miles wide and up to 180 miles long, all in parts of Pennsylvania, Maryland, Virginia and West Virginia, and entirely within PJM Interconnection’s Mid-Atlantic region. NextEra requested this designation and it indeed now covers it proposed routing through Rural Loudoun as well as an alternative path using existing rights of way through Doubs, Maryland.

## Mid-Atlantic

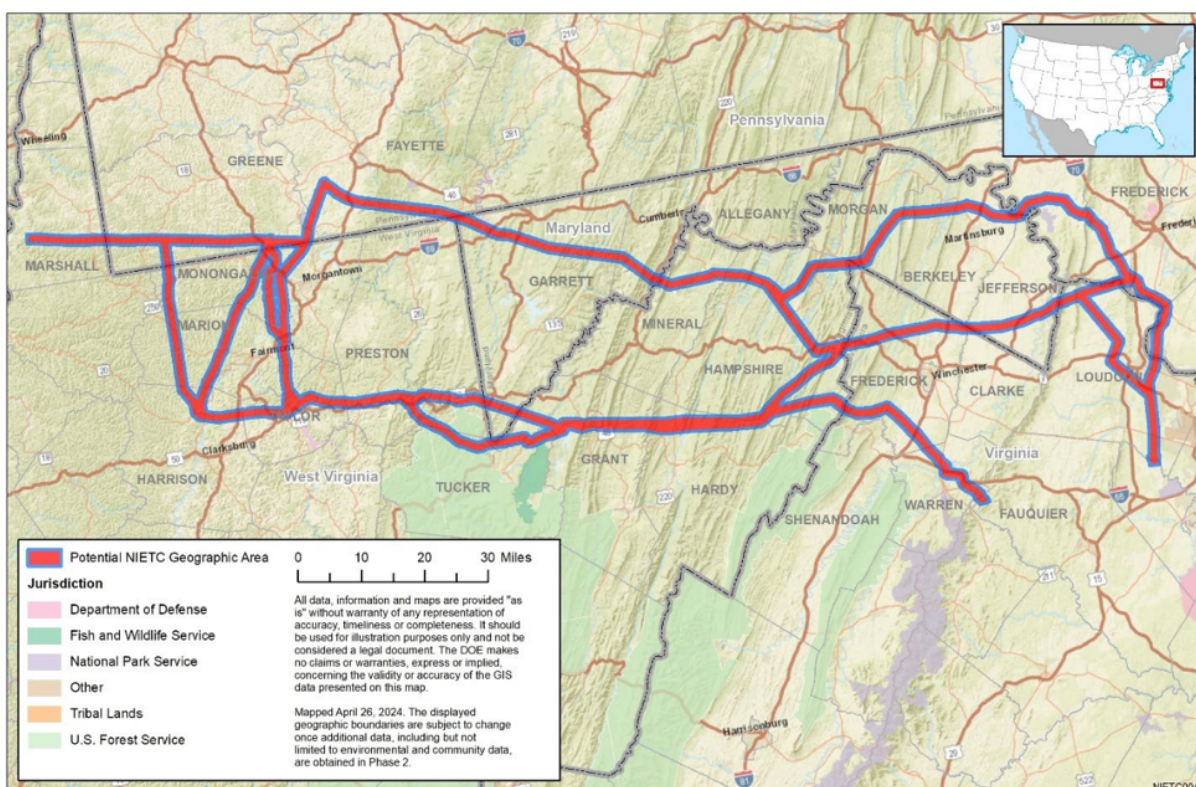


Figure 1b – Mid-Atlantic National Interest Electric Transmission Corridor (NIETC)  
(Source: US Department of Energy).



### 3. Obstacles and Projected Impacts

*The Setting.* Rural Loudoun County comprises nearly two-thirds of the County's land area and is designated by the County's 2019 General Plan as the Rural Policy Area (RPA).<sup>6</sup> The RPA comprises a blend of working farms, rural economy uses, low-density residential, pastoral landscapes, forested areas, mountains, and wildlife habitats. It contains twelve Rural Historic Villages<sup>7</sup> and six of the County's seven incorporated towns,<sup>8</sup> with which the County partners under Joint Land Management Area (JLMA) planning areas that help manage new growth and expansion outward from the towns.

The RPA is planned as an enduring rural landscape of working agricultural lands, rural economy uses, and limited residential development. The General Plan includes policies that protect the landscape, economy, and the existing community character of the RPA, emphasizing the preservation of farmland; natural, environmental, and heritage resources; open space; and vistas that are vital aspects of Loudoun's identity. The RPA's transportation planning is based largely on maintaining two-lane rural section roadways along most rural corridors, the Virginia Scenic Byway program, national and state historic district designations, and the VDOT Rural Rustic Roads Program.<sup>9</sup>

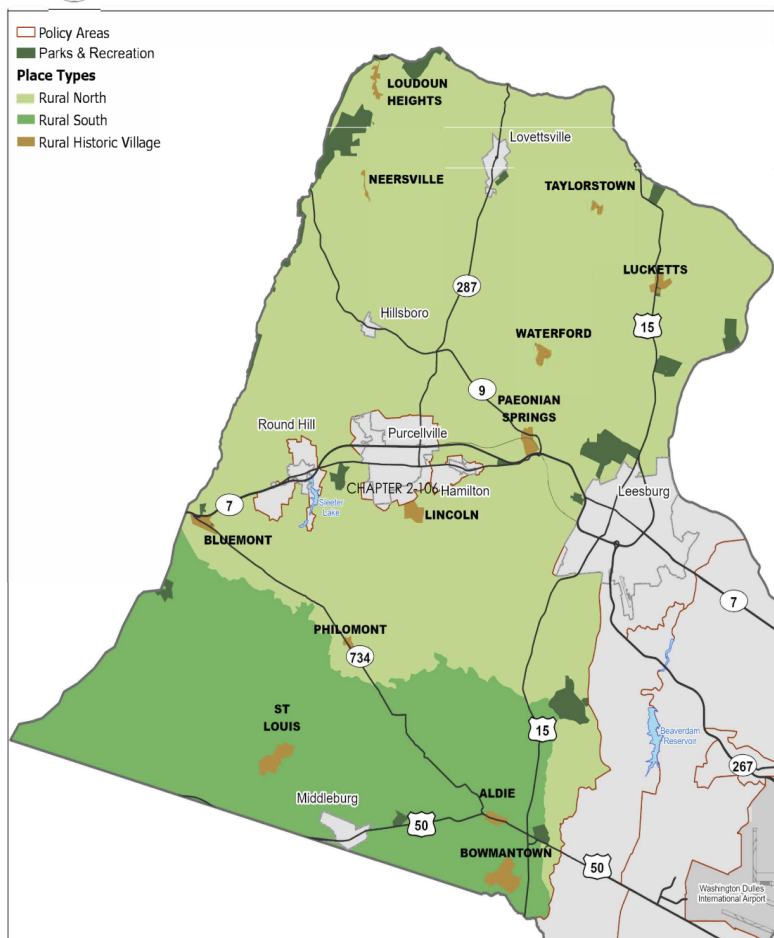


Figure 2 - The Rural Policy Area and Place Types, 2023.

<sup>6</sup> Excerpted from <https://www.loudoun.gov/DocumentCenter/View/152285/General-Plan---Combined-with-small-maps-bookmarked>

<sup>7</sup> Rural Historic Villages of Aldie, Bluemont, Bowmantown, Lincoln, Loudoun Heights, Lucketts, Neersville, Paeonian Springs, Philomont, St. Louis, Taylorstown, and Waterford.

<sup>8</sup> Towns of Leesburg, Hamilton, Hillsboro, Lovettsville, Purcellville, Round Hill.

<sup>9</sup> All of the maps in this Chapter 3 are sourced from the Loudoun County Office of Mapping and Geographic Information, except as otherwise noted.

The area also contains a large number of Loudoun County public facilities and infrastructure that must be addressed in considering a transmission line: (13) elementary, middle, and high schools; (10) community, recreation, adult, aquatic, and senior centers; fire and rescue stations; telecommunications towers and buildout lines under the County Broadband Expansion Program, stormwater structures and pipes; and (15) parks and trails facilities.

## **Impacts on Rural Communities**

The RPA communities in total consisted of some 20,000 households in 2020. Growth in households is taking place largely in the northern half of the RPA and is expected to reach some 25,000 households in the course of the decade.

Spread among them are *historically African American Communities in Loudoun*. In the post-Emancipation years, African Americans celebrated their freedom by investing tremendous energy in family, home, work, education, and fellowship. The Loudoun County landscape

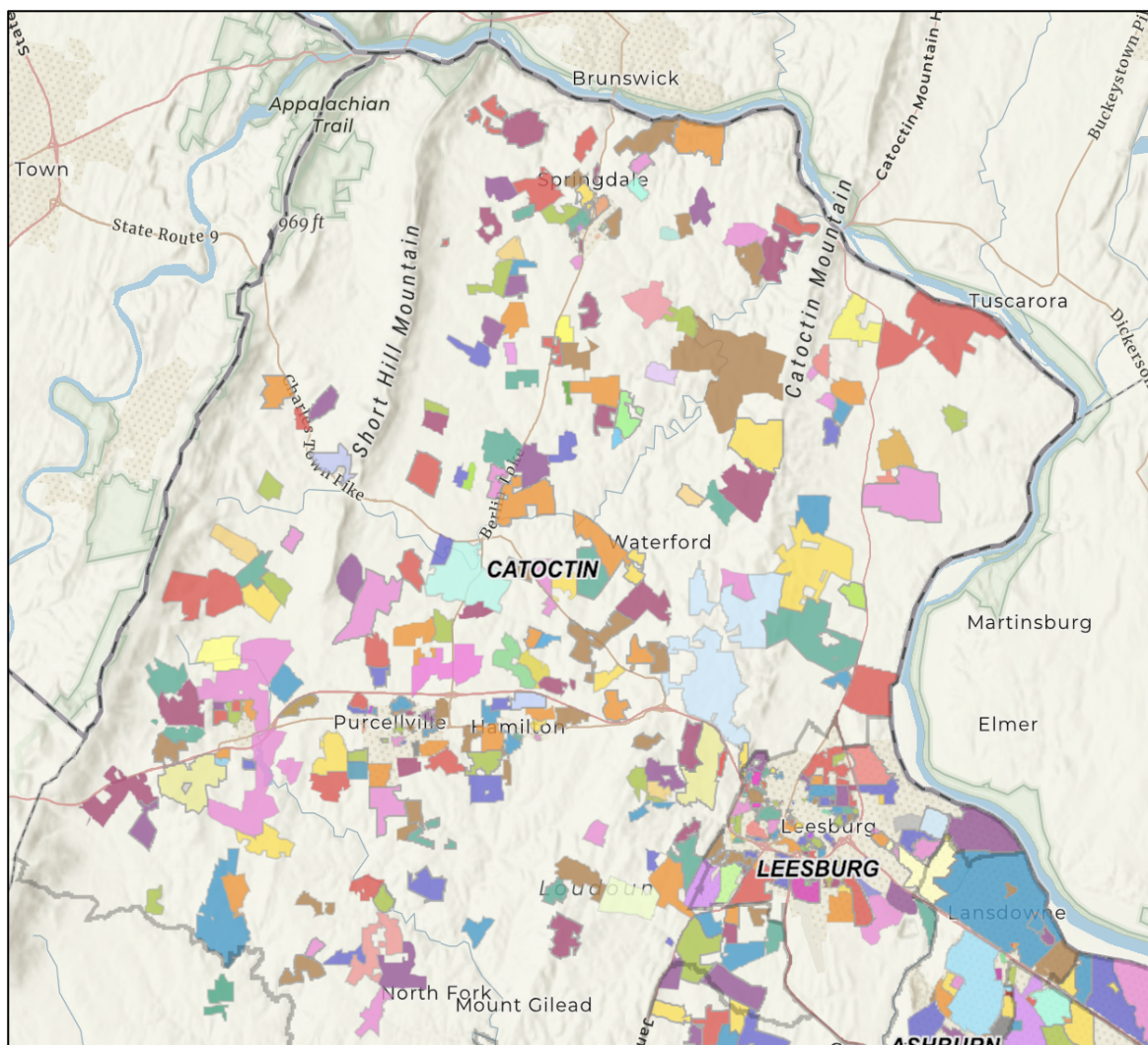


Figure 3 - Rural Loudoun Residential Communities, 2023.

contains *many historical assets that reflects their industry and achievement* in the homes, churches, schools, fraternal lodges, and settlements that they built and survive today.<sup>10</sup>

The massive NextEra transmission line project proposal began receiving pushback immediately from community stakeholders, where a concerted effort has been under way for more than 75 years to preserve open spaces and viewsheds in a historic area, home to indigenous people as early as 10,000 years ago<sup>11</sup> and settled in the 1700's largely by Quakers. Community associations across the area have uniformly expressed their opposition to the NextEra proposal.

Specific projected local impacts of the proposed NextEra line on four areas - Lovettsville area, the Hamilton Station Road Coalition, the Mt. Gilead, Digges Valley, and Goose Creek Historic District Area, and the Waterford Historic District – are summarized below. They are excerpts from their full impact statements, which also include selected images, and may be found in *Annex 2* along with other organizational Local Impact Statements. Local Impact Testimonials of individual residents of Rural Loudoun are included in *Annex 3*.

### **Community Associations Opposing the NextEra line**

- Aldie Heritage Association
- Bluemont Citizens Association
- Hamilton Station Road Coalition
- Hillsboro Preservation Foundation
- LTLA – Lovettsville
- Old Wheatland Estates HOA
- Rosemont Farm at Trevor Hill HOA
- Unison Preservation Society
- Waterford Citizens' Association

## **The Lovettsville Area**

Lovettsville and its surrounding neighborhoods make up a quintessential rural Virginia community that is known and loved for its beautiful viewsheds, prime agricultural land, and miles of county gravel roads that reinforce the county's rural image and culture. *The proposed route cuts through the heart of western Loudoun's highly productive agricultural land bisecting farms as well as numerous rural properties and residential neighborhoods.*

*The line may be built on or adjacent to neighborhoods impacting approximately 82 property owners by decreasing property values and disrupting the quality of life currently enjoyed and highly valued by these residents.* In addition, the line will cross through or near dozens of small farms, equestrian facilities, and businesses on private property impacting the economic viability of individual landowners and the Town. The line will also cross over Milltown Creek, an important wetland and vital tributary of the protected Catoctin Creek,

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<sup>10</sup> For more, including descriptions of specific communities such as Britain (or Guinea), Gledsville, Hamilton, Leesburg, Lincoln, Lovettsville, Paeonian Springs, and Waterford, see here.

<https://www.loudounhistory.org/african-american-communities/>.

<sup>11</sup> <https://www.loudounhistory.org/history/loudoun-before-europeans/>

thus threatening the ecology and biodiversity of the county's primary waterways. The area is also a part of the Chesapeake Bay Watershed.<sup>12</sup>

The impact of the proposed line on the economic health and well-being of the Lovettsville community is significant. Building the line through the rural community of Lovettsville will result in the loss of viable farm land under, around, or adjacent to the towers; a reduction of residents' property values due to visible intrusion of the towers and potential buyer resistance; loss of enjoyment of the natural beauty of the environment by residents, tourists, and customers; and the destruction of wetlands, trees, habitat, and native fauna and flora.

*Property Values.* Numerous studies show that the presence of overhead power transmission lines results in a devaluation of property values between 5% and 30%, with a direct relationship of the property's proximity to the Right of Way and viewshed being a major factor. Lovettsville's research on the impact of the line on property values in Lovettsville has thus far identified 82 properties, that are in or adjacent to the proposed ROW. According to the county tax assessments, the total value of these properties is \$71,580,530. Applying a conservative estimate of a 15% devaluation of properties in the ROW and a 5% impact of adjacent properties, results in \$10,737,080 million devaluation in private property in the 4.5 miles of the transmission line in Lovettsville.<sup>13</sup>

*Agritourism.* The lion's share of Loudoun's tourism industry revenue is from tourists who come to Western Loudoun's wineries, breweries, distilleries, and cideries (\$118 million revenue per year) to escape urban intensity and enjoy "DC's Wine Country" in a relaxing pastoral environment. While those tourists are here, they stay in bed and breakfasts and Air B&Bs in Lovettsville and elsewhere. They dine in local restaurants and visit Loudoun farm markets and one or more of Lovettsville's three wineries and breweries. They flock to Lovettsville for craft festivals, farm tours, Octoberfest, Christmas Markets, Mayfest, and other local holiday events. The presence of huge towers supporting 500kv power transmission lines will severely impact the aesthetics of their experience and will certainly deter tourist visits.

#### Resident Testimonial

"We decided we wanted better, more natural open space for our daughters-so we moved further west believing western Loudoun County was the perfect fit. I have fallen in love with running on the dirt roads, with the fields and woods as my backdrop. The girls have learned the sounds of birds, trickling water and the meaning of quiet. However, now we are beginning to realize Loudoun County is at risk of losing its charm to large power lines "

*Aliza from Lovettsville*

*Farming Operations.* The Lovettsville area is zoned for Agricultural use (AR1). This zoning reflects the reality of farming as the prevailing historic occupation and a long-standing conscious effort to preserve the land and foster continued agricultural uses, and is supported

<sup>12</sup> <https://www.cbf.org/about-cbf/>

<sup>13</sup> Colwell, Peter F. and Sanders, Jim L., Electric Transmission Lines and Farmland Value, The Journal of Real Estate Research, Vol. 39, No. 3 (July-September 2017, pp. 373 – 400.



by Soils Classification as prime agricultural land <sup>14</sup>. The County government, pursuant to Virginia Code acknowledges “Important Farmlands”<sup>15</sup> and has established “Agricultural Districts”<sup>16</sup> and promotes agricultural land use through tax incentives. A very large farming operation in the pathway of the transmission line is home to the *largest hay production and sales business in the county, serving livestock owners here and throughout the county and surrounding jurisdictions*. Farming practices in the area have evolved from a smaller number of large family farms to many smaller “farmettes” involved in a “farm to table” marketing approach, on-site self-service markets, equestrian facilities, wine grape cultivation, and leasing for hay production. If approved as proposed, the NextEra greenfield line will severely disrupt these farm practices by imposing ROWs through farms and farmettes, thereby reducing or eliminating farmable areas and discouraging on site sales of farm products.

*Historic Resources.* Settled primarily by German immigrants in the early 18<sup>th</sup> century, Lovettsville was known then, as now, as the German Settlement. Lovettsville was established as a Town in 1836. During the Civil War Lovettsville was an important stop for Union troops crossing the Potomac River and served as a crossing point for the Underground Railroad. <sup>17</sup> This is an essential part of Loudoun’s African American History Sites and Monuments tourism program facilitated by Visit Loudoun. See more here: <https://www.visitloudoun.org/things-to-do/history-and-museums/african-american-history/>

## **The Hamilton Station Area**

The proposed greenfield line may travel along the west side of Hamilton Station Road from Clarkes Gap Road until a little under a mile south of Route 9 where it heads off to the southeast. This part of the route is well-populated. The route will run through many individual properties, disrupting homes, farms, and farmettes. The several businesses along Hamilton Station Road include a successful winery, a thriving large farm stand selling local meats, jams, dairy, and honey; a restaurant, a pest control firm, and several small to large horse and sheep farms. All are contributors to the thriving agritourism of Rural Loudoun.

Like much of Rural Loudoun County, the area represented by the Hamilton Station Road Coalition is an integrated tapestry of nearly 200 residential, agricultural, and commercial entities. In some cases, the properties encompass all three of these elements - providing

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<sup>14</sup> Soils Classification : Website “loudoun.gov” County Soil Types

<sup>15</sup> Important Farmlands: Commonwealth of Virginia State Corporation Commission Division of Public Utility Regulation “Guidelines for Transmission Line Applications Filed Under Title 56 of the Code of Virginia, Section III, paragraph F. 1 and 2.”

<sup>16</sup> Zoning Ordinance Agricultural Districts “It is hereby declared to be the policy of the County of Loudoun to conserve, protect and to encourage the development and improvement of its agricultural and forestal lands for the production of food and other agricultural and forestal products. It is also the policy of the County of Loudoun to conserve and protect agricultural and forestal lands as valued natural and ecological resources which provide essential open spaces

<sup>17</sup> See more about this history here: <https://www.loudounhistory.org/history/underground-railroad-loudoun-frederick/>

income to the residents through agriculture. If any piece of the tapestry is adversely impacted, the ripple effects are felt throughout the entire fabric of the area. *The negative impact of the proposed NextEra transmission lines would be felt financially, psychologically, and physically across all elements of this area.*

*Property Values.* Our research on the impact of the proposed line on property values in the Hamilton Station Coalition has thus far identified nearly 200 properties that are in or adjacent to the proposed ROW. According to the county tax assessments, the total value of these properties is over \$146 million. Applying a conservative estimate of a 15% devaluation of properties, based on various studies, results in \$22 million devaluation in property value in this area.

*Agritourism.* The portion of the impacted area of Loudoun County represented by the Hamilton Station Coalition represents a critical tourism gateway to Rural Loudoun County for tourists who want to stay in bed and breakfasts and AirB&Bs; dine in local restaurants; shop in Loudoun farm markets; and enjoy the pastoral atmosphere at local wineries and breweries. As visitors crest the hill at westbound Route 7 and continue west on Route 9, they see a beautiful, welcoming vista all the way to Short Hill Mountain. The pastoral beauty of mountains and farms that enables these tourists to forget the hustle and bustle of the city *will be permanently marred for both visitors and residents.* The presence of the proposed huge towers supporting 500kV power transmission lines will severely impact the aesthetics of their experience and will certainly deter tourist visits.

*Environment.* The water running through the rivers and streams that traverse this area are a constituent part of the Chesapeake Bay Watershed. As a result of being a source for this critical natural resource, the policy makers and residents are obligated to ensure that the Chesapeake Bay watershed standards are upheld. Without careful consideration prior to and during construction of the proposed power lines, there is a potential to adversely impact this vital natural resource which encompasses 6 states, 18 million people, and 3,600 species of plants and animals. The unique conditions of the Catoctin Creek are needed for many native plant species and wildlife and are important for the environmental health of the area. *Damaging the Catoctin Creek would have far-reaching effects.*

*Historic Resources.* There are numerous properties of historical significance in the area of the Hamilton Station Coalition. They date back to pre-revolutionary days, with some having been built in the early-mid 1700's. They have survived the American Revolution and the Civil War and represent the best of American construction and agriculture. George Washington was known to conduct surveys in this area, and likely rested in some of the homes. The Debutts subdivision, established from the original 340-acre farm known as Grassley Farm, contains important remnants of the Civil War now in restoration and can be found on replica maps of the area during the Civil War.

## The Mt. Gilead, Digges Valley, and Goose Creek Historic District Area

The Mt. Gilead and Digges Valley area covers about 2,000 acres of conservation easement land originally settled by the Quakers in the mid-eighteenth century. It overlaps portions of the Goose Creek Historic District of at least 10,000 acres. The local economy is composed of farms and tourism (wineries, equestrians, cyclists), including Zephaniah Farm and Vineyard, the Brookside Dairy, and Digges Valley Farm. *A major risk of the proposed NextEra power line is that it will undermine the conservation easement system that preserves open land against pressure from housing and other developments.* Conservation easements also protect natural resources, including forests, wetlands, streams, wildlife, and prime agricultural soils.

The proposed line would also disrupt the rural economy, which depends on viewsheds to attract tourism, and would most certainly lose business revenues and property values. It would heavily affect farming and vineyard operations and result in disincentives to invest in these businesses. Similarly, the transmission line would result in a loss of property value for residences, particularly those with views across the open spaces of Loudoun Valley.

### Resident Testimonial

“The construction of the transmission lines would signal that I lived in a community that didn't care about preserving and protecting our valuable natural surroundings, our food sources, our history, and a great place for our children to grow up. I would want to leave. “

*Kris from Leesburg*

## The Waterford Area

Waterford, Virginia is a National Historic Landmark, with a mission to preserve the historic buildings and open spaces and, through education, to increase the public's knowledge of life and work in an early American rural community. National Historic Landmarks are historic properties that illustrate the history of the United States.<sup>18</sup> The proposed pathway of the NextEra transmission lines passes through the easement-protected open space owned by the Waterford Foundation called the Phillips Farm. The towers and lines, along with the cleared area required for their installation, would forever destroy the historic viewshed that is an important element in Waterford's National Historic Landmark designation.

### Resident Testimonial

“There are so many things to love: the horse community, wineries and breweries, hiking and equestrian trails, farmers who raise organic crops and pasture raised meats, abundant wildlife and the gorgeous scenic views especially the Catocin mountains. People of rural Loudoun are hard-working, community connected and preservation minded people who love this beautiful land we've been entrusted to care for. “

*Beverly from Waterford*

The Phillips Farm property is a natural wetland with rolling hills and valleys that is a haven for wildlife, birds, bats, turtles, insects, and plant life. The proposed line would uproot

<sup>18</sup> <https://www.nps.gov/orgs/1582/index.htm>



numerous species and plant life that define the natural habitat (see the list of protected species).<sup>19</sup> Its hedgerows and farmland invoke the village's agricultural past. The Catoctin Creek that passes through the property was home to indigenous peoples as early as 12,000 years ago and was the site of permanent settlements 9,000 years ago. Today, one can visit the village and walk in the open spaces and imagine the lives and histories of people who first settled the village in 1733 and who experienced some of the most critical events in the history of the British colony and United States for over close to 300 years. One of the Foundation's walking trails is located within the portion of the Phillips Farm through which the lines would be built. People would have no interest in hiking that trail in the future.

*Foundation Financial Impact.* The Foundation currently hosts as many as 60,000 visitors to Waterford each year, including students who attend our programs on segregated education, Reconstruction, and African American history. The Waterford Annual Historic Crafts Fair draws as many as 15,000 individuals each year and is one of the primary means of financial support for the Waterford Foundation. Those visitors are less likely to choose to come to Waterford when the viewshed does not reflect the 18<sup>th</sup> and 19<sup>th</sup> century periods reflected in the events and educational programs held here. This would threaten preservation and education efforts costing the Foundation as much as \$500,000 each year, *which receives no Federal or state monies* and is completely dependent on funds from donors, events, the annual Fair, and educational programs. The Foundation would also likely lose its National Historic Landmark status and would eventually fail. *The failure of the Waterford Foundation would leave a huge gap in Virginia's preservation and education efforts and would be a stain on the state's reputation for preserving the unique history of one of the original 13 colonies.*

*Preservation Easement.* Should the Virginia Outdoors Foundation (VOF) easement on the affected property through which the transmission line pathway traverses not remain in force, *the future of preservation easements throughout Virginia will be at high risk.* Current easements through the VOF and other entities would no longer offer protections against utility and other infrastructure projects. Property owners would not be willing to invest the time and funds required to ease their lands, resulting in increased development, pollution, and the loss of historic sites that can never be replaced.

*Education Programs.* The Foundation hosts as many as 35 classes of fourth graders each year. They learn about African American students' experience in a segregated, one-room schoolhouse built in 1867 after the Civil War. Seventh grade students visit Waterford to learn about Waterford during Reconstruction through the Jim Crow era. Loudoun's high school students taking Advanced Placement History and African American History classes learn about the unique African American heritage of Waterford as a colonial and federal period village that welcomed free African Americans and formerly enslaved people.

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<sup>19</sup> Virginia Department of Wildlife Resources Special Status Faunal Species in Virginia; chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://dwr.virginia.gov/wp-content/uploads/media/virginia-threatened-endangered-species.pdf

Students would no longer be able to imagine this history with 200 foot-tall power lines looming over the village.

*Property Values.* There are 32 historic homes and other properties that border the Phillips Farm property owned by the Foundation and on which the transmission lines would be built. A 2018 study from the Journal of Real Estate Research found that vacant lots near high-voltage power lines sell for 44.9% less than equivalent lots that aren't located near power lines. If you take a step back, a lot that is located within 1,000 feet of transmission lines tends to sell for 17.9% less.<sup>20</sup> There would also be no home or property within the 1420 acre protected National Historic Landmark where the lines would not be visible. The value of all of these properties would also be diminished. The Waterford Foundation owns 13 historic properties and would experience heavy financial loss of the value of its assets.

#### Resident Testimonial

"We have a small farm right outside the village of Waterford. Many depend on agro-tourism for their livelihoods. Our farm is a huge investment. Huge power lines drastically decrease property values, those who depend on the bucolic scenery to draw business, will no longer thrive, less tax dollars, people moving out of the area, potential loss of historic designation - it hurts the entire community. "

*Aubrey from Waterford*

*Farming Operation.* The Phillips Farm property currently produces income for the Foundation from the rental of the property to a farmer who grows hay there. The transmission line path would significantly reduce the amount of acreage available for farming, reducing the hay output for the farmer's cattle and the amount of rent the Foundation could collect from him. That same farmer's land would also be significantly affected by the transmission line pathway, as it would bisect his farm, making a huge portion of his land unusable. His farm would no longer be a viable farmstead.

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<sup>20</sup> <https://www.tandfonline.com/doi/abs/10.1080/10835547.2018.12091490>

## Impacts on Heritage, the Rural Economy, and the Environment

Heritage, natural, and environmental resources include historic and archaeological sites, scenic areas and corridors, designated heritage areas, battlefields, historic cemeteries, other cultural landscapes, the Potomac River edge, major rivers, stream corridors, floodplains, wetlands, steep slopes, ridges and mountainsides, forested and vegetative landscapes, limestone geology areas, farmlands, soil resources, and important plant and wildlife habitats. Complementary elements, such as air quality, aural environment, and the night sky are also important to the health, safety, and welfare of Loudoun residents. Natural, environmental, and heritage resources are tangible assets that make the County an appealing place to live, work, learn, and play while contributing directly and indirectly to Loudoun's economy. ***Preserving, protecting, and enhancing these resources is critical to the County's long term economic, environmental, and social sustainability.***

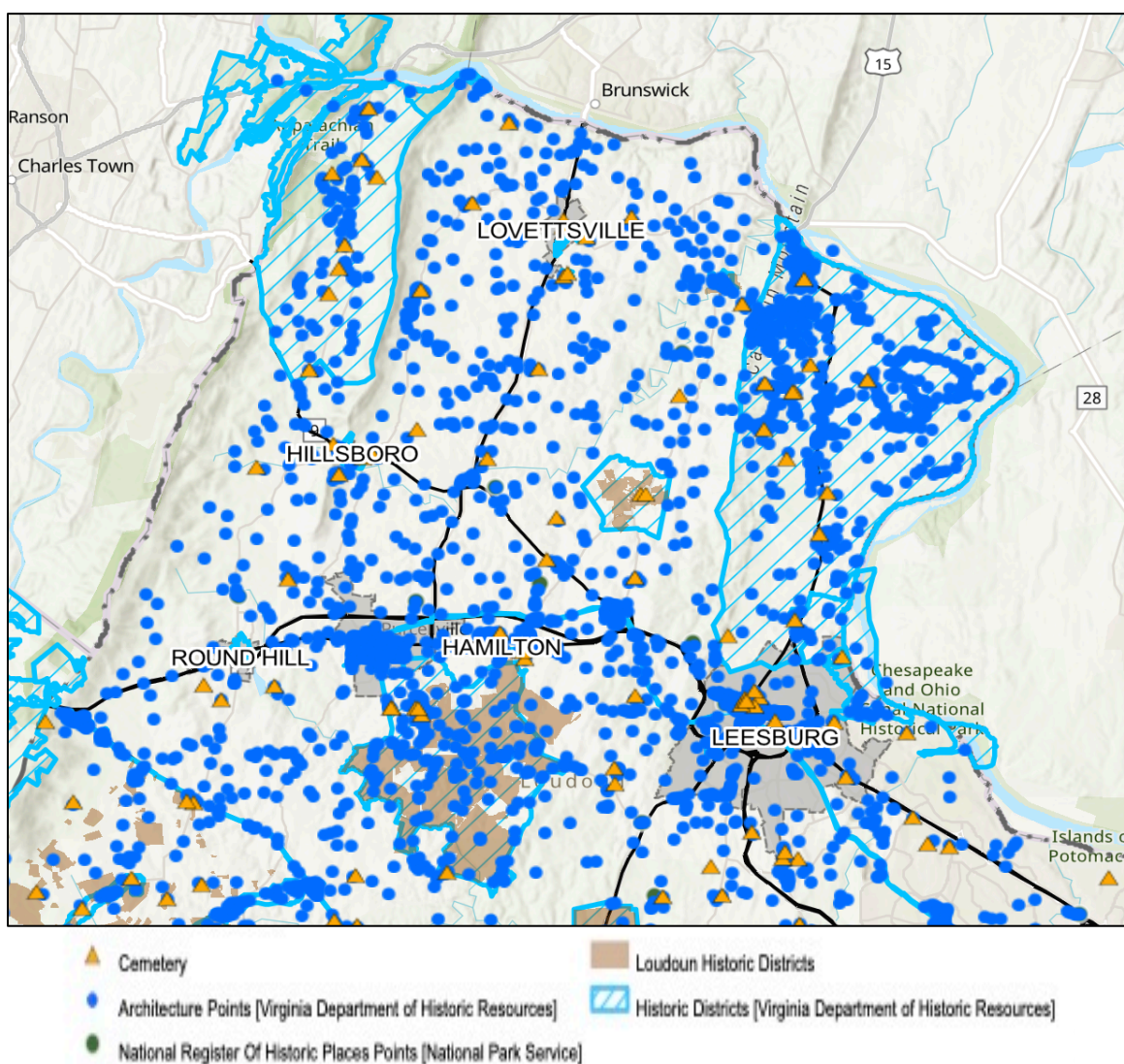


Figure 4 – Heritage Resources of Rural Loudoun County, 2024.

## Historic Districts

Loudoun County protects seven *Historic and Cultural Conservation Districts* - Aldie, Beverdam Creek, Bluemont, Goose Creek, Oatlands, Taylorstown, and Waterford.<sup>21</sup>

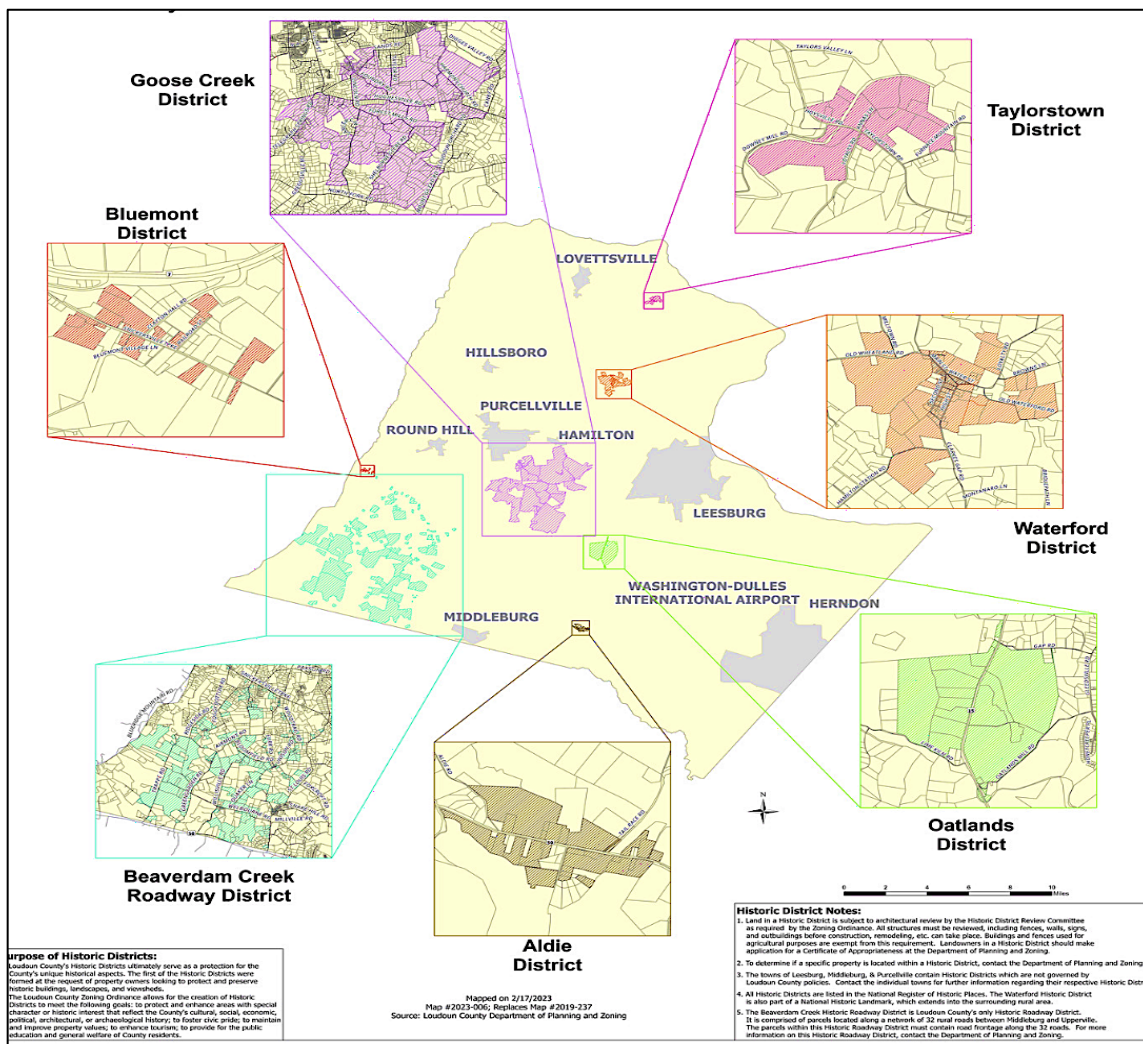


Figure 5 – Historic and Cultural Conservation Districts of Loudoun County, 2023.

*Other "Historic Districts", facilitated by the Virginia Department of Historic Resources, include Between the Hills, Catoctin Rural Historic District, Paeonian Springs, Unison and Unison Battlefield, Oatlands, Balls Bluff battlefield and Bear's Den. Typically, a majority of property owners within such a district initiate the process of such a designation.*

<sup>21</sup> The "Loudoun Historic Districts" are the Historic Zoning Overlay Districts administered by the Loudoun County Historic District Review Committee (HDRC), which has authority over architectural review requirements.



Also, Loudoun County contains *five National Register Town Historic Districts* – Round Hill, Hillsboro, Purcellville, Leesburg, and Middleburg. It reinforces this protection via the Loudoun Historic Village Alliance (<https://loudounvillages.org/>).

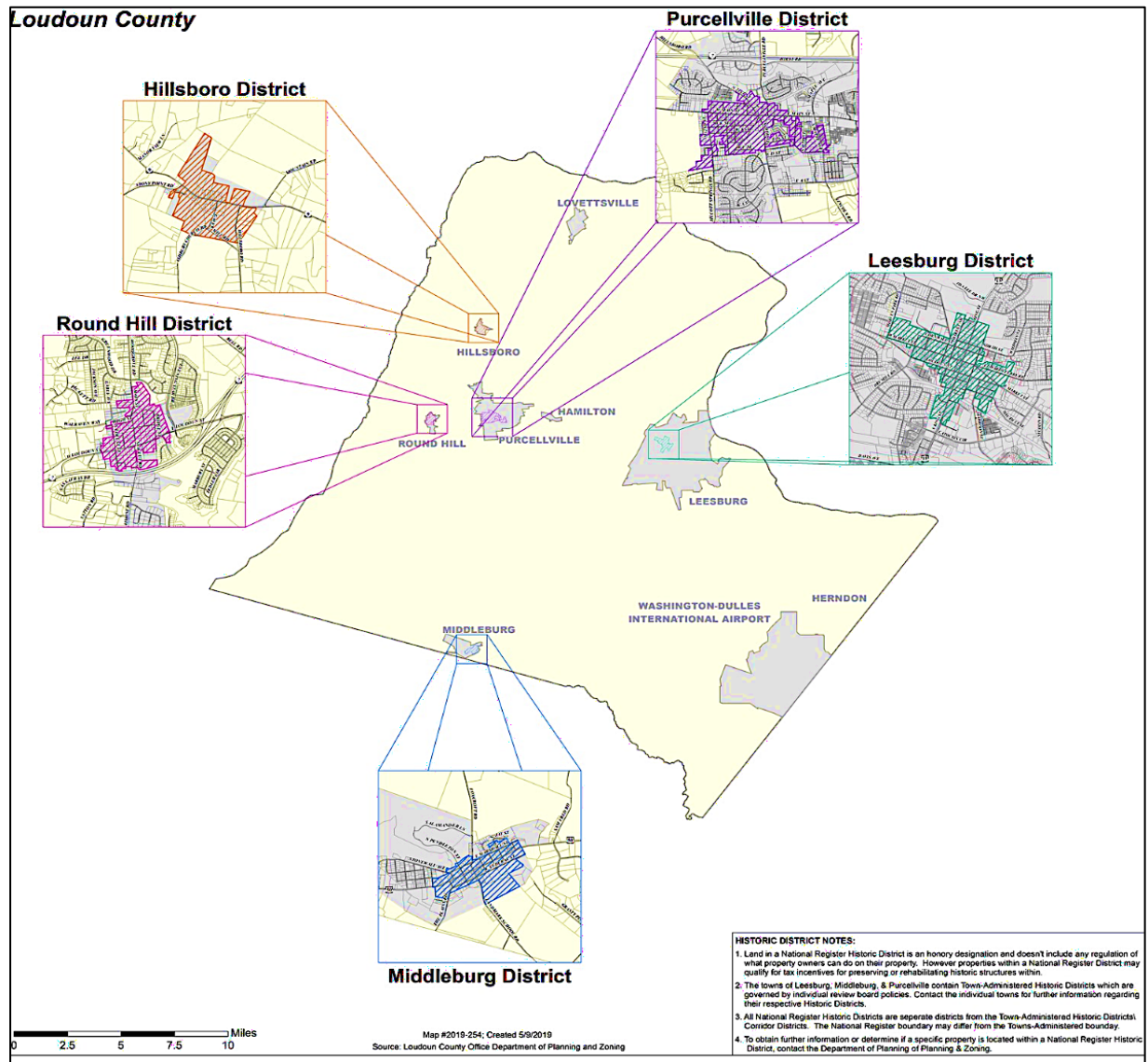


Figure 6 – National Register Town Historic Districts of Loudoun County, 2023.

Rural Loudoun also contains a vast number of "*architecture points*." These are locations that "have had the benefit of an architectural survey either by (1) the Virginia Department of Historic Resources (DHR) or (2) a consultant who has provided that information to the DHR. These points include all sites that are already designated on the "National Register of Historic Places" (and are automatically on the Virginia Register). Others may or may not be eligible for such designation.

## Cemeteries and Burial Grounds

A yearlong project to catalogue Loudoun's historic burial grounds culminated in an online database of more than 200 active and historic cemeteries.<sup>22</sup> *The work was prompted by repeated incidents in which historic burial grounds—often from Loudoun's black communities—were found on land slated for development.* It is paired with a “story map,” a way for visitors to learn about the initiative and share new information with the county about potentially unmapped graves, burial grounds and cemeteries. “We faced a number of

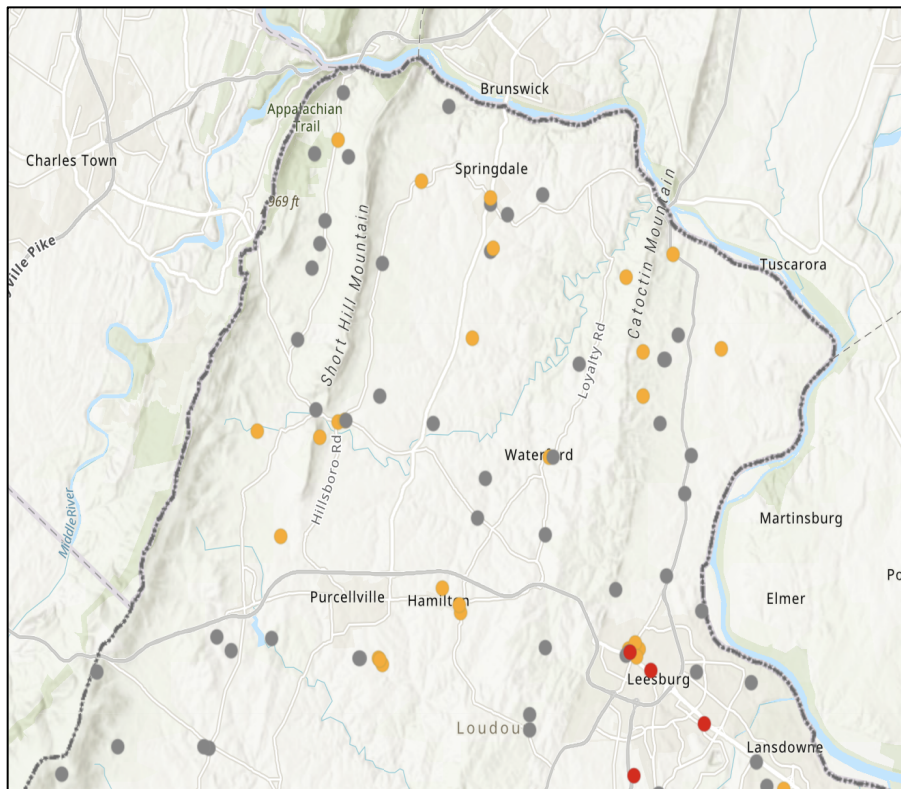


Figure 7 - Cemeteries & Burial Grounds in Rural Loudoun County, 2024.

challenges in this project,” stated Office of Mapping and GIS Director Kristin Brown. “The socio-economic status of Loudoun residents varied widely in the 17th century, including enslaved African Americans, poor tenant farmers, and wealthy property owners. As a result, burial traditions varied. People were often buried on private property, sometimes with engraved monuments or headstones, but often with wooden markers that have since disintegrated.” Most of the cemeteries are situated on private property. Waterford alone is home to three historic cemeteries, including an African American and a Quaker cemetery.

<sup>22</sup> For more, see <https://www.loudoun.gov/CivicAlerts.aspx?AID=4976&ARC=10228>



### **Heritage Tourism Impacts - Laurel Hill Farm**

<https://www.vrbo.com/2559622>

Laurel Hill is currently in a Land Trust of Virginia easement and is designated on the Loudoun County Historic Register. *A powerline through the property would destroy the meaning of an "easement".*

The home dates from circa 1762 and the stone barn from 1824. The property, now on its 5<sup>th</sup> owner, was held for nearly 200 years by the Quaker Myers family, given to them by William Fairfax, brother to Lord Fairfax, who was instrumental in settling much of Virginia. It is a complimentary historical property to the development and maintenance of nearby historic Waterford Village.

People visit Laurel Hill for agrotourism, weddings and generally those wishing a respite from their busy lives. The towers and lines, along with the cleared area required for their installation, would forever destroy the viewshed. Its proposed path would destroy old trees overlooking a creek and likely would forever disturb 3 natural surface springs and seeps that drain into the creek, one of which arises at the base of a large oak tree, and a nascent pond. All of this is crucial to the tucked-away feeling that this property provides from modern traffic. As a consequence, the AirB&B/VRBO side of the business would fail, all of which is needed in order to support the costs of the working farm.

***Should the Land Trust of Virginia conservancy easement for Laurel Hill not remain in force, the future of preservation easements throughout Virginia will be at high risk just as current easements through the VOF and other entities would no longer offer concrete protections against utility and other infrastructure projects.***

### **Agricultural and Forestal Districts**

To support the rural economy and ensure that agriculture continues as a long-term use in the RPA, the County supports participation in programs that provide assistance and reduced tax burdens to landowners under the Loudoun County 2019 General Plan for Land Use: the Agricultural and Forestal District (AFD) program, and public/private conservation easements. *The County's Land Use Assessment Program and AFD program are tools used to protect agricultural lands and forests.*

The Land Use Assessment Program provides tax relief to landowners *to protect farmland for future agricultural use and to protect historic and scenic resources for the economic and cultural benefits derived from their preservation.* The AFD program limits the subdivision of large, farmable acreages and forested lands (typically 20-40 acres) and prohibits cluster subdivisions.

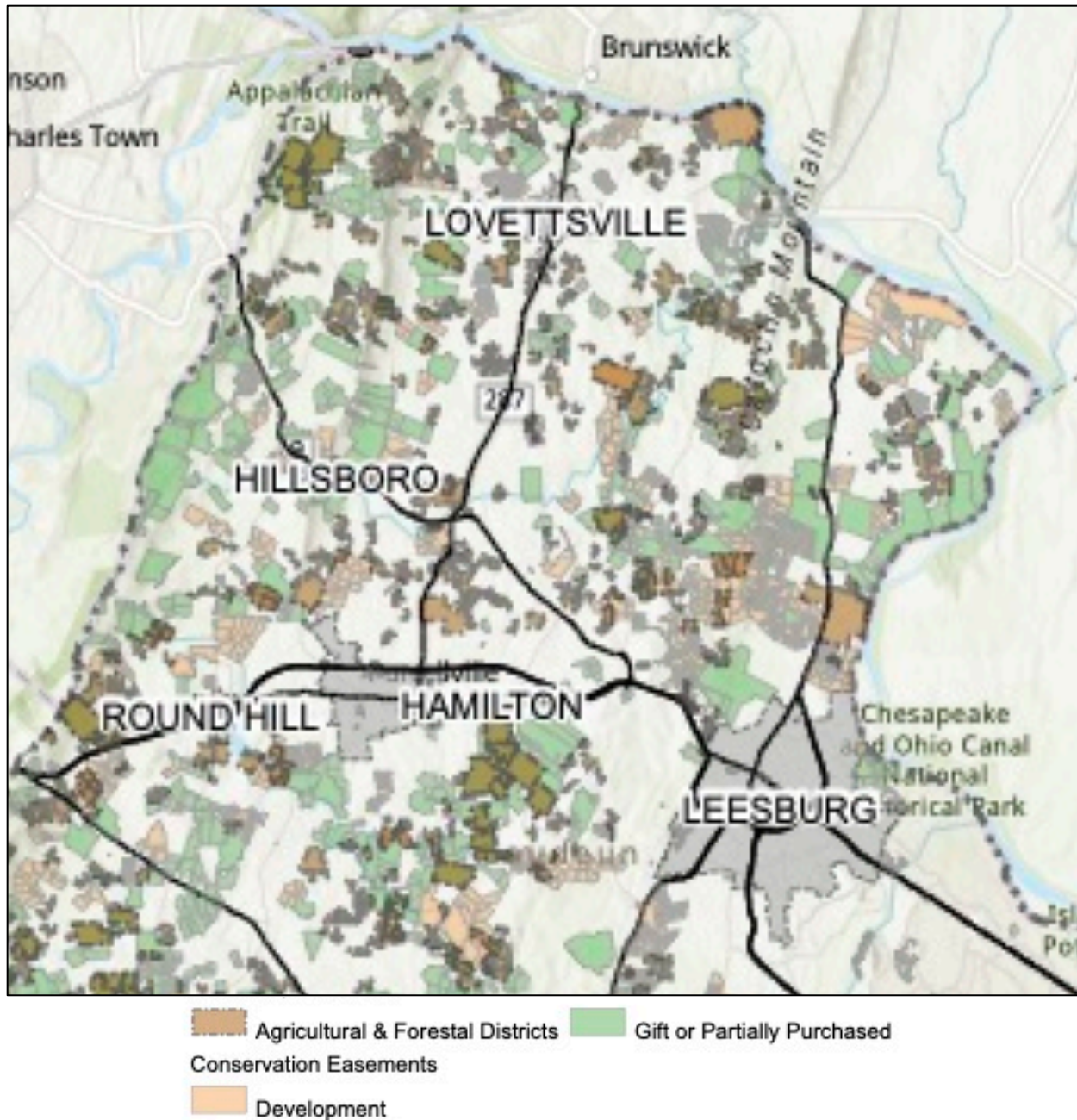


Figure 8 – Agricultural & Forestal Districts, and Conservation Easements of Loudoun County, 2024.

### Conservation Easements

The primary means of preserving agricultural land and open space permanently is through the establishment of conservation easements on individual properties, which restrict

residential and non-agricultural uses.<sup>23</sup> Conservation easements currently preserve over one-third of the acreage within the RPA, the vast majority of which are held by private land trusts. In 2023, total historic preservation and environmental conservation easements numbered 4,436 under programs of the Virginia Outdoor Foundation, the Land Trust of Virginia, the Northern Virginia Conservation Trust, and the Old Dominion Land Conservancy. Such easements are expected to grow substantially in years to come with ongoing support.<sup>24</sup>

***Large blocks of the land that would need to be traversed by the proposed NextEra transmission line are in permanent conservation easements and within historic districts*** and include the **Waterford National Historic Landmark**, granted to Waterford by the US Department of the Interior, National Park Service in 1970 and updated in 2023<sup>25</sup>. This land is also part of the **Journey Through Hallowed Ground National Heritage Area**<sup>26</sup>.

The Commonwealth of Virginia instituted the Virginia Historic Preservation Easement Program in 1966, recognizing that advancing development would inevitably affect the many historic areas and properties of the Commonwealth. Historic preservation easements are private, legal interests conveyed by a property owner to a qualified preservation organization or government agency. Typically, they protect properties that have historic, architectural, or archaeological significance. In Waterford, the majority of structures are covered by easements. Easements may also be used to preserve natural land values that comprise the setting of historic buildings, as is true for the open space around Waterford.

**Virginia is uniquely rich in places of historic importance.** As the site of the first successful English settlement, one of the original 13 colonies, home to many important figures in American history, and the sites of major Revolutionary and Civil War battles, Virginia holds a unique place in America's history. Since 1966, the Department of Historic Resources has protected over 700 properties, including 15,000 acres of battlefields. Among Virginia's treasures, there is one World Heritage Site, 121 National Historic Landmarks, and 3,269 listings on the National Register of Historic Places in the state. These are irreplaceable resources, most of which are protected by easements.

The current Open Space Land Act within the Code of Virginia<sup>27</sup> and the tenets of most historic preservation easements in Western Loudoun County would not permit construction of utility

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<sup>23</sup> Historic and conservation easements are legal deed restrictions donated by landowners to conservation or preservation organizations. These are put in place to protect documented historic and environmental features on the property in perpetuity.

<sup>24</sup> See, for example, the 2024 Farm, Food and National Security Act (H.R. 8467) as summarized by the Land Trust Alliance <https://landtrustalliance.org/newsroom/press-mentions/the-farm-bill-train-is-leaving-the-station>

<sup>25</sup> [https://www.nps.gov/orgs/1582/index.htm#:~:text=National%20Historic%20Landmarks%20\(NHLs\)%20are,of%20American%20history%20and%20culture.](https://www.nps.gov/orgs/1582/index.htm#:~:text=National%20Historic%20Landmarks%20(NHLs)%20are,of%20American%20history%20and%20culture.)

<sup>26</sup> <https://nsbfoundation.com/journey-through-hallowed-ground/>

<sup>27</sup> "Open-space easement" means a nonpossessory interest of a public body in real property, whether easement appurtenant or in gross, acquired through gift, purchase, devise, or bequest imposing limitations or affirmative obligations, the purposes of which include retaining or protecting natural or open-space values of real property, assuring its availability for agricultural, forestal, recreational, or open-space use, protecting natural resources, maintaining or enhancing air or water quality, or preserving the historical, architectural or archaeological aspects of real property.

transmission lines in protected spaces. In order to fulfill their stated mission, easements should be sacrosanct and inviolable. If the Virginia State Corporation Commission were to approve the NextEra proposal, they would be acting counter to both the VOF strictures within their easement of Foundation property and the Code of Virginia.

**It is critical that the power and protection of easements be preserved. Without them, the history of our nation is in peril and may be lost to future generations.** Violating this many historic easements would set a terrible and irreversible precedent and would effectively eliminate preservation gains made in the last 57 years in Virginia.

These easements are supplemented by the Village Conservation Overlay District – for areas such as Bluemont, Lincoln, Loudoun Heights, Lucketts, Neersville, Paeonion Springs, Taylorstown, and Waterford – and they aim to recognize the development patterns existing in traditional villages that are considered to be valuable heritage resources and to encourage the retention and reinforcement of the pattern, character, and visual identity of individual villages.

#### Resident Testimonial

“Construction of these transmission lines would ruin much of what is special about Rural Loudoun. They would cut through some of the most beautiful, scenic and historic landscape in the state of Virginia. There are dozens of rural businesses that would be negatively affected by these proposed lines through either the destruction of the viewshed that brings thousands of visitors each year, to the outright destruction of their properties and businesses “

*Linda from Waterford*

#### **AT RISK - The History of Loudoun County – Save Rural Loudoun!**

<https://www.saveruralloudoun.org/>

- Demolition and abandonment of the many historic homes once frequented by Thomas Jefferson as a young surveyor and George Washington as a young surveyor and militia officer. Example: Bel Mont Farm Circa 1765.
- Loss of the roads and paths the Army of the Potomac and the Army of Northern Virginia took on the way to the battles of Antietam at Sharpsburg in 1862.
- Lost history of the enslaved who risked their lives to transit Western Loudoun on the Underground Railroad through Loudoun's rural roads and paths to the village of Waterford and on to freedom and citizenship north to the Mason-Dixon Line.

"Open-space land" means any land which is provided or preserved for (i) park or recreational purposes, (ii) conservation of land or other natural resources, (iii) historic or scenic purposes, (iv) assisting in the shaping of the character, direction, and timing of community development, (v) wetlands as defined in § 28.2-1300, or (vi) agricultural and forestal production.

"Public body" means any state agency having authority to acquire land for a public use, or any county or municipality, any park authority, any public recreational facilities authority, any soil and water conservation district, any community development authority formed pursuant to Article 6 (§ 15.2-5152 et seq.) of Chapter 51 of Title 15.2, or the Virginia Recreational Facilities Authority



## Parks and Recreation

*More time spent in parks and green spaces can help individuals fight against mental health issues like depression, anxiety and stress. Making sure that all people have access to parks and outdoor programming is a critical way to increase these positive effects on health and quality of life for your community.<sup>28</sup>*

The projected line would pass through Virginia State, National, and Local parkland, including the Appalachian Trail, the Regional W&OD Trail, the new Sweet Run Virginia State Park, creating the potential for multiple negative impacts. The *Between the Hills Conservancy* (formerly known as Blue Ridge Center for Environmental Stewardship) advocates for the conservation and stewardship of the natural, cultural, historical, and agricultural resources of Sweet Run State Park and the Between the Hills region.

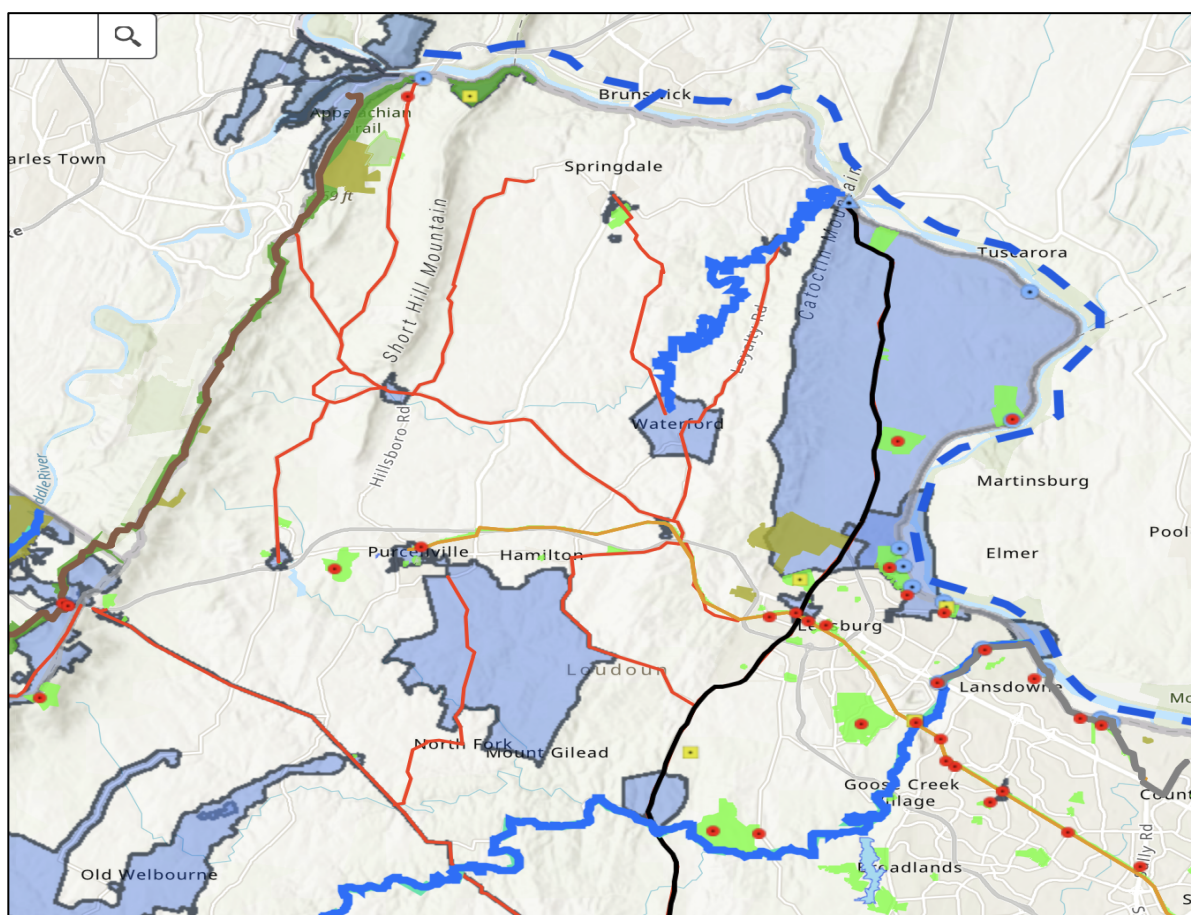


Figure 9 – VA State & Local Trails & Parks, Scenic Rivers, Scenic Byways & Driving Tours of Loudoun.  
Source: Virginia Department of Conservation and Recreation County, 2020.

<sup>28</sup> Source: PRPA National Recreation and Park Association



## The Rural Roads Network

Loudoun County is home to Virginia's largest network of historic recreational trails and gravel rural roads – more than 250 miles – *all of which depend on their viewsheds!* And the state has protected more rural roads than any other state in the country. Many of these miles of byways pre-date America, carved out of Virginia's hilly terrain by early settlers who helped shape our nation and build our prosperous communities.

These roads, and the stories they tell, are worth preserving. They tell of pioneers seeking a new life, of terrible wars fought along these roads, of slavery and the struggle for freedom, of the coming of the era of the automobile, and now modern commuters living side by side with farmers. They are truly America's Routes.

These old roads provide a unique and beautiful experience for Loudoun's rural residents and to the thousands of visitors who come to enjoy our spectacular and authentic rural landscape. Learn more at <https://americasroutes.com/>

The effort to preserve western Loudoun's unpaved road network includes having it placed on the National Register of Historic Places – ***the application is currently under review by the National Park Service.*** Disruption of this historic and recreational asset would be a detriment to the County, also as a highly valued economic resource as part of heritage tourism. These roads are the basis for many programs that draw cyclists by the thousands of participants to Loudoun each year and are critical for the maintenance of Loudoun's equestrian industry.



Source: Bike Loudoun <https://bikeloudoun.org/> <https://bikeloudoun.org/useful-links>



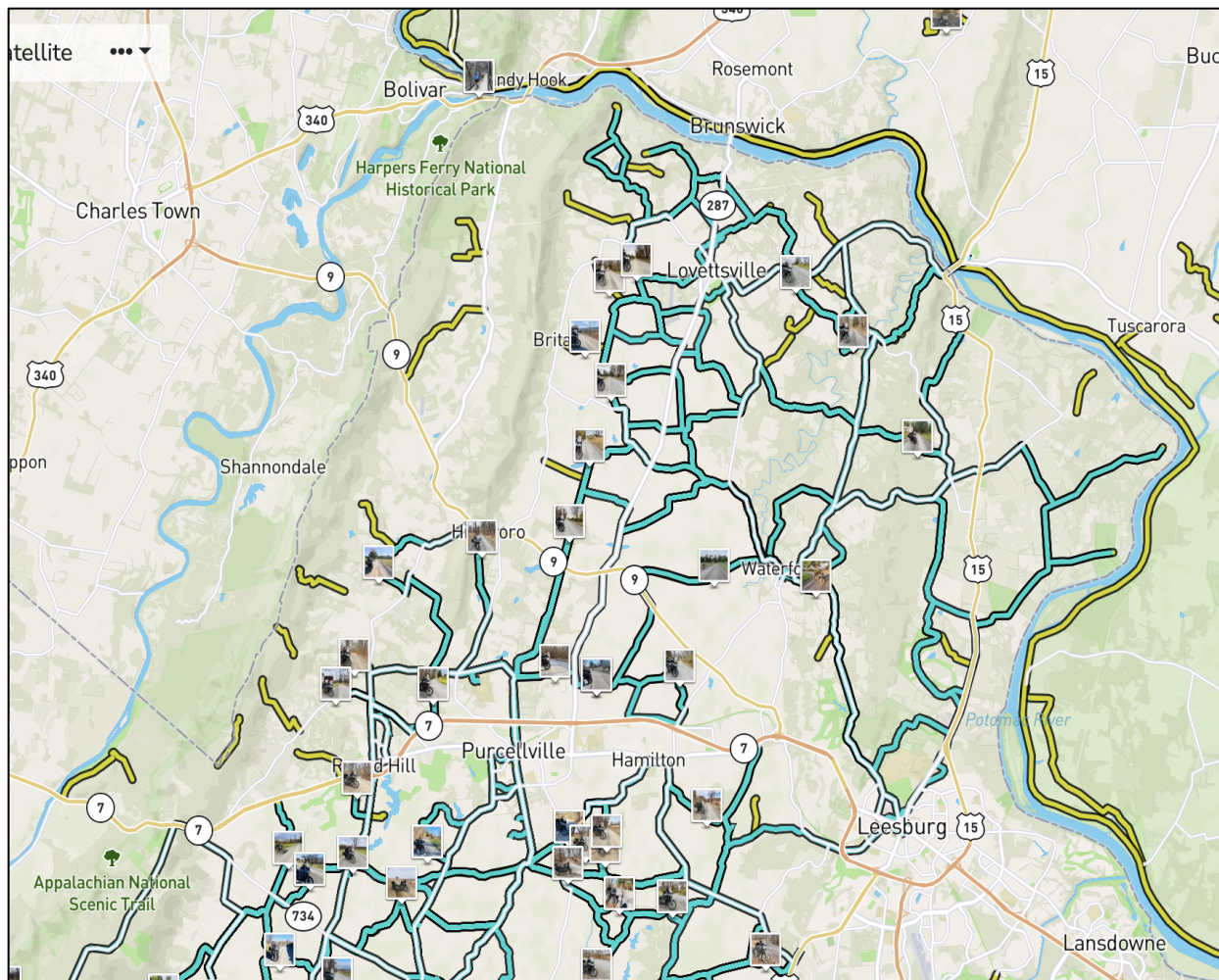


Figure 10 – The Unpaved Road Bike Trail Network of Rural Loudoun, 2023. Source: Bike Loudoun.

## Specialty Agriculture

*The County's land development approach for the RPA is to limit residential development so that land will remain available for the continued operation, expansion, and establishment of the rural economy uses that preserve the rural character of the landscape and support the County's environmental goals.*

Loudoun's rural economy has evolved over the last 40 years into an agritourism sector that is very prominent in horticulture and specialty farm products, farm markets and wayside stands, the equine industry, orchards, vineyards, farm wineries, cideries, breweries, and hospitality services.

### Resident Testimonial

"I anticipate a big impact on local agriculture. We have a small Christmas tree farm. Many of our customers come back year after year, and always talk about how beautiful this area is. Having a monstrous power line cutting so close to our property will no doubt change that perception for the worse "

*David from Lovettsville*



During the 2022 USDA Agricultural Census <sup>29</sup> period of 2017-22, the number of farms in Loudoun grew by 6% to 1,332 active farms. The market value of agricultural products sold increase by 14%, representing \$50.2 million of the local economy. This reflects the support

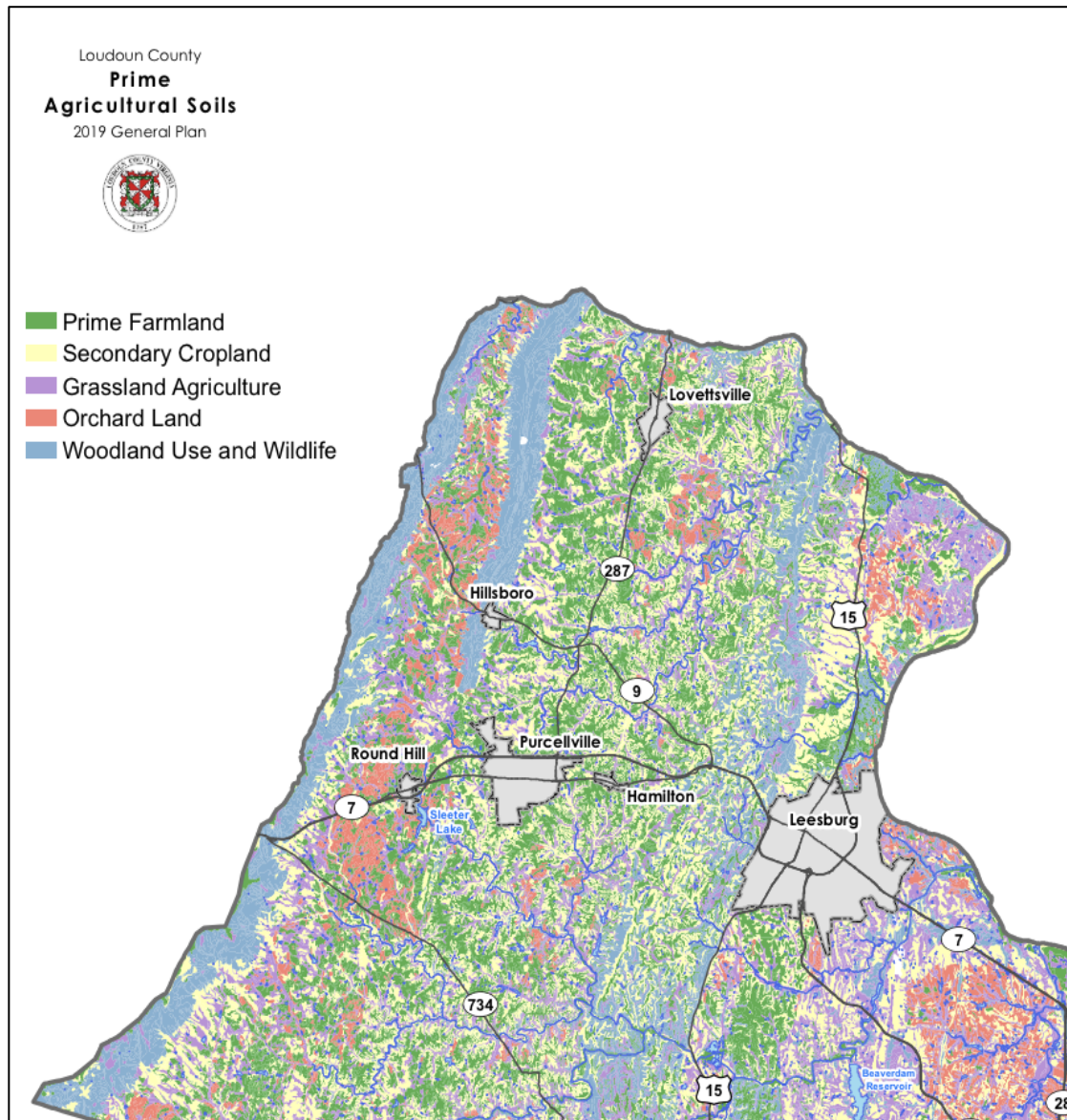


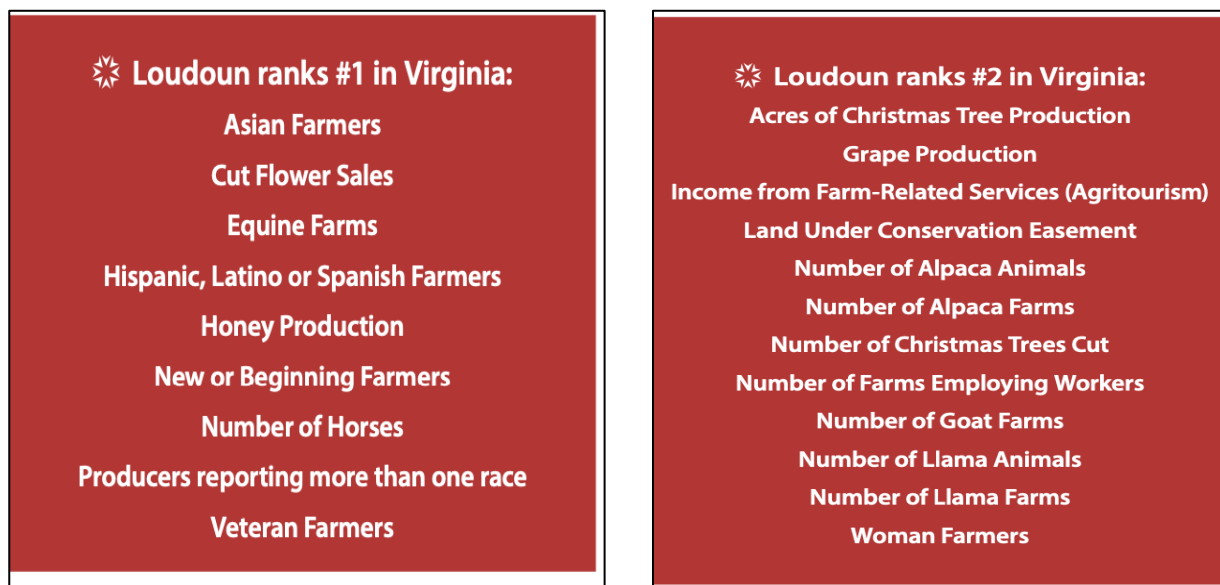
Figure 11 – Prime Agricultural Soils of Loudoun County, 2024.

<sup>29</sup> The Census of Agriculture, prepared by the US Department of Agriculture (USDA,) and released in February 2024, is a complete count of U.S. farms and ranches and the people who operate them. Even small plots of land - whether rural or urban - count if \$1,000 or more of such products were raised and sold, or normally would have been sold, during the census year. The Census of Agriculture, taken only once every five years, looks at land use and ownership, operator characteristics, production practices, income, and expenditures.

of the Board of Supervisors to preserve Rural Loudoun through land use policy and business-friendly services providing rural economic development assistance facilitated by the County Department of Economic Development. Such policies provide ease of entry into the market and nurture opportunities for location, expansion, and growth within non-traditional agriculture sectors.

Loudoun's agricultural-based business has increased diversity in both the type of products grown and the farmers who grow them, reflecting the movement from primarily traditional generational farming to a greater mix of smaller farms. The farmers in Loudoun rank high in the Census in number of female producers, and have top ranking in the number of Asian producers, Hispanic producers, veteran farmers, and those producers reporting more than 1 race.

*Loudoun is a leader in specialty agriculture development and production within the Commonwealth of Virginia.* Loudoun farms produce more honey, have the most land dedicated to berry production, and generate the most income from cut flower sales than any county in Virginia. In addition, Loudoun increased the number of horse farms in the county by 7% (compared to a statewide decrease of 19%) and, subsequently, increased the number of horses by 24% (compared to a statewide 16% decrease).



Additionally, Loudoun is one of the top two Virginia counties in several other agricultural areas including Christmas tree production, agritourism, grape production, and alpaca, llama, and goat farms. What this data confirms is that Loudoun's agricultural-based businesses offer a wider variety of products and opportunities than other areas of the Commonwealth and the nation that concentrate agricultural efforts on commodity crops such as corn, wheat or soybeans, or raising cattle.<sup>30</sup>

<sup>30</sup> Source: "Loudoun County Economic Development 2022 Census of Agriculture", Department of Economic Development, March 2024.



Figure 12 – Large diversity of Loudoun farmers and crops. Source: 2022 Ag Census and LC DED.

## The Equine Industry

Western Loudoun has thriving equestrian businesses, including boarding facilities, training and instruction businesses, and private horse farms which are supported by the Loudoun County Equine Alliance. <https://loudounequine.org/>. According to the most recent survey of the horse industry in Loudoun that was conducted by the Weldon Cooper Center at the University of Virginia in 2013, the County is home to over 14,000 horses. The total economic impact of the horse industry in Loudoun was calculated to be \$180 million annually (not including property tax revenues). The study also concluded that the horse industry creates over 2,700 jobs in the County and draws approximately 78,000 spectators to equestrian events a year, with one third coming from out of state.

Loudoun's equestrian stables are mostly on smaller parcels, especially in the northern sections of the County where lot density is highest. According to the 2013 survey, the most common horse property size is 10-19 acres. Any transmission line across properties of this size would encumber most of the property from equestrian use.

Loudoun is home to an exceptionally high number of Olympic-caliber equestrians and professionals who make their living boarding, training, and showing horses. The value of the top-level competition horses can easily be \$100,000 or more. ***No owner of competition horses would want their horse trained in an area with proximity to a transmission line and no owner would be comfortable allowing access for transmission maintenance to a pasture containing their valuable horses.*** Transmission line maintenance via helicopter could be equally problematic and dangerous to the animals.

Given the choice between two equal training or boarding barns (feed, stall and turnout only), one at a property with a transmission line near pasture, barns and arenas and one without,



a client paying the average training fees of \$2000 or more monthly or boarding fees of \$800-\$1200 monthly would seek the facility without the transmission line. Even with those prices, profit margins are thin. Reducing prices would be economically disastrous. There is also reason for concern regarding the health effects of transmission lines. The electromagnetic fields (EMFs) that surround areas with transmission lines can cause problems in equine sleep patterns, feeding, digestion, fertility, and other health concerns.<sup>31</sup>

**In 2019, the Loudoun County Board of Supervisors unanimously approved a master plan for development of a county-wide linear parks and multi- trails has begun and any disruption of its development by the building of a transmission line would subvert a highly popular and economically valuable initiative.** This plan envisions use of trails throughout western Loudoun by equestrians. Creating this system of interconnected trails along transmission line corridors are not desirable as they lack shade and most riders find the hum of the wires and the overall environment around the towers antithetical to the type of experience they are seeking when trail riding. In the 2013 survey, 63% of respondents cited trail riding as an activity they enjoy – even Olympic riders on top competition horses trail ride!

*Equestrians are vital stewards of rural land – once they begin to pack up and leave, a cascade of other disastrous economic impacts will be felt across traditional agriculture, agritourism, and direct horse care enterprises such as farriers, veterinarians, and feed stores.*

**Equine Industry Impacts - Loudoun Therapeutic Riding, Inc.** <https://ltrf.org/>

In 2021, Loudoun Therapeutic Riding finally purchased a permanent home at 14490 Berlin Turnpike, Lovettsville, VA. Loudoun Therapeutic Riding is a non-profit organization which embraces the power of the horse and equine-assisted services to promote well-being and community inclusion for people with physical, cognitive and mental health challenges. Founded in 1974 it was the original pilot program for therapeutic riding in Virginia.

The 25-acre property is a haven for adults, children with special needs and also provides a respite for their parents and caregivers who enjoy the property while their student participates in equine-assisted services. For example, teens from North Spring Behavioral Health Center come weekly to experience the healing power of horses at this quiet farm. In addition, a dozen veterans suffering from PTSD, TBIs, and depression, among other challenges, seek refuge each week through the Equine Services for Heroes program. Seniors from local assisted living facilities, Waltonwood and Heritage Hall, visit during the mild weather to touch the horses and share memories.

*The threat of enormous buzzing towers will create stress and anxiety that the riding community actively works to diminish. As Therapeutic Riding enters its 50th year, it is actively planning its' future in one central location. The towers will undermine the tranquil environment the therapeutic community has worked so hard to create.*

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<sup>31</sup> Black, Shelly, What You Need to Know About EMF Exposure and Your Horses, Equine Wellness Magazine, July 3, 2020.

## Wineries and Wine Growers

The Loudoun Wineries and Wine Growers Association numbers 100 members, of which over 50 are wineries, which are committed to the responsible growth and sustainability of the Northern Virginia wine industry. The proposed route cuts through the heart of the nationally recognized Middleburg American Viticultural Area (AVA) and numerous farms employing Loudoun County's prime soils consisting of Purcellville Silt Loam, Tankerville Silt Loam, and Middleburg Silt Loam. The terrain elevations between 450 and 550 feet, moderate climate and prevailing westerly winds coupled with prime soils provide excellent growing conditions for many varieties of wine grapes. This AVA is certified by The US Treasury Department Alcohol and Tobacco Tax and Trade Bureau as "a viticultural area for American wine as a delimited grape growing region having distinguishing features, a name, and a delineated boundary."

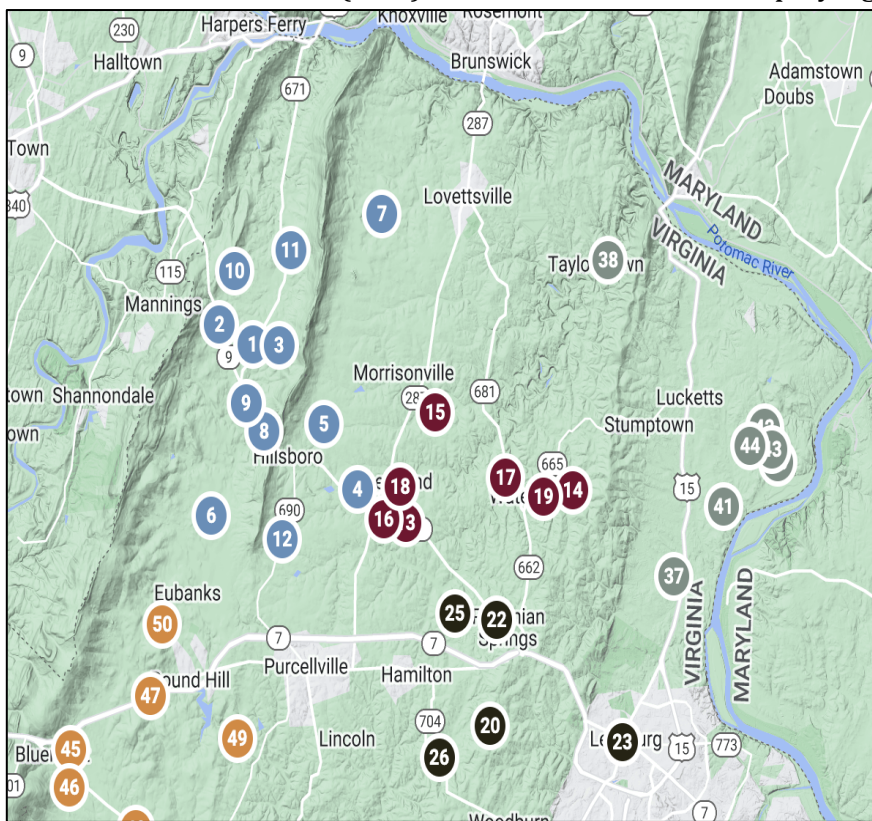


Figure 13 – The Wineries of Loudoun County, 2024.

Since 2008, Loudoun's wine Industry has been growing at an average rate of 4.2% per year. The 2023 Virginia Commercial Winegrape Report lists Loudoun County wine grape production *as second in the state with a 2023 production of 1,795 tons on 776 acres of vineyard*. The proposed greenfield power transmission line right of way would effectively remove between 364 and 485 acres of prime viticultural farmland from ever being available for vineyard or winery use. These prime soils are not a renewable resource.

### Resident Testimonial

"We have farmed our Farm for 74 years. Our farm is not only beautiful but is instrumental in our lives and the lives and the economy of Loudoun County. Our farm depends on Wine Tourism for Direct-to-Consumer Agrotourism. Our wine is directly tied to saving the farm from annihilation of the farmland we have protected from urban development. "

*Bill from Mount Gilead*

Tourists and Loudoun residents come to Rural Loudoun’s wineries, breweries, distilleries, and cideries to escape urban areas and enjoy “DC’s Wine Country” in a relaxing pastoral environment. Industry revenues in 2022 totaled \$118 million. Substantial additional revenue is derived from such tourists as they stay in local bed and breakfasts, air B&Bs, hotels, and motels. They dine in local restaurants and visit Loudoun farm markets. They shop in local towns and villages. They flock to local towns for Octoberfest, Christmas Markets, The Annual Waterford Fair, and other events. The presence of huge towers supporting 500kV power transmission lines will severely impact the aesthetics of their experience and will certainly deter tourist visits.

## Breweries

With 30+ breweries and counting, Loudoun is one of the most vibrant craft beer destinations in the US with a diversity of settings few other regions can match. The LoCo Ale Trail connects trendy urban breweries and bespoke taprooms of Sterling, Ashburn, and Leesburg in the East with farm beer gardens and stunning mountain-top beer halls of the Piedmont and Blue Ridge out West with views of the Potomac River, Harpers Ferry National Park, or lush farmland below. See here for exact locations

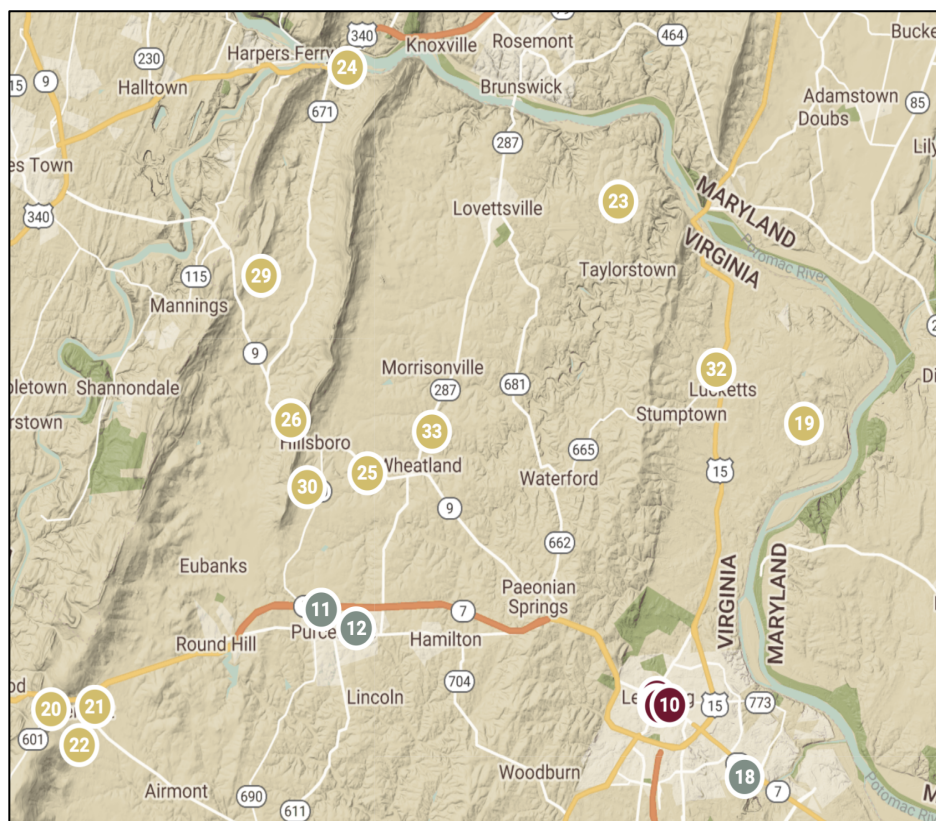


Figure 14 – The Breweries LoCo Ale Trail, 2024.

<https://visitloudoun.org/food-and-drink/loco-ale-trail/>

Western Loudoun breweries drive very significant agritourism through their tastings, flights and happy hours, live music most nights, multiple Oktoberfest events, Virginia Craft Beer Month in August, and local brew masters who are eager to showcase hoppy pale ales, crisp lagers, malty barrel-aged stouts, and much more. The proposed NextEra transmission towers and lines would drastically impact the brewery industry in western Loudoun, which operates largely out of doors and relies especially on the aesthetics of their locations and experience to attract customers.



## The Bed & Breakfast Industry

This industry, served by the Loudoun Bed and Breakfast Guild, <https://www.loudounguildva.com/>, is an integral part of the County's thriving tourism destination and agricultural region, boasting significant economic contributions from its unique lodging properties amidst western Loudoun farms, wineries, breweries, historic landmarks and arts and cultural events - see the 2024 Western Loudoun Art and Studio Tour over June 7-9, 2024. <https://www.wlast.org/>

*The financial health and well-being of Loudoun's Bed & Breakfast industry depends entirely on the protection of our historic and environmental sites, including National Historic Landmarks, historic districts, and properties under conservation or preservation easements. Any plan that disregards these protections undermines the integrity of our community and heritage. The negative impact of such construction cannot be overstated.* The B&B industry strongly opposes the implementation of new "greenfield" lines in rural Loudoun. See more at <https://www.loudounguildva.com/>

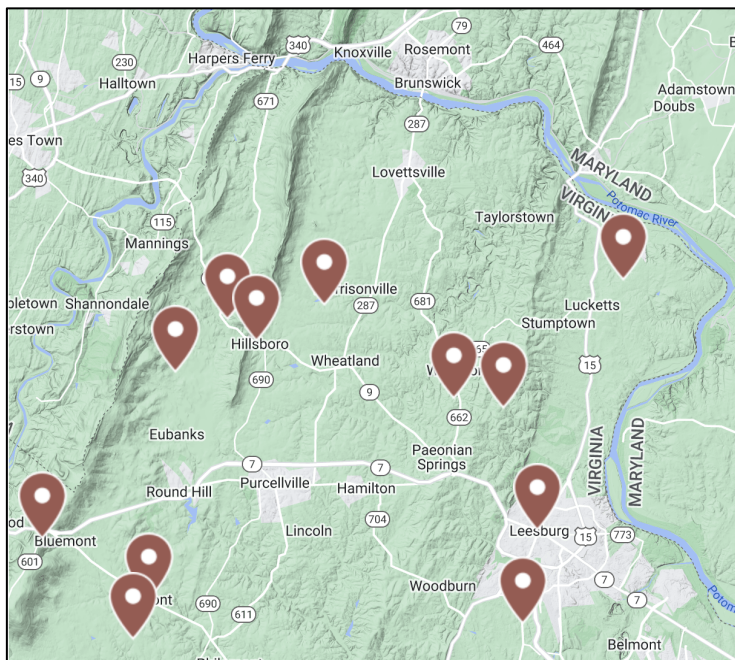


Figure 15 – BnB Lodging in Loudoun County, 2024.

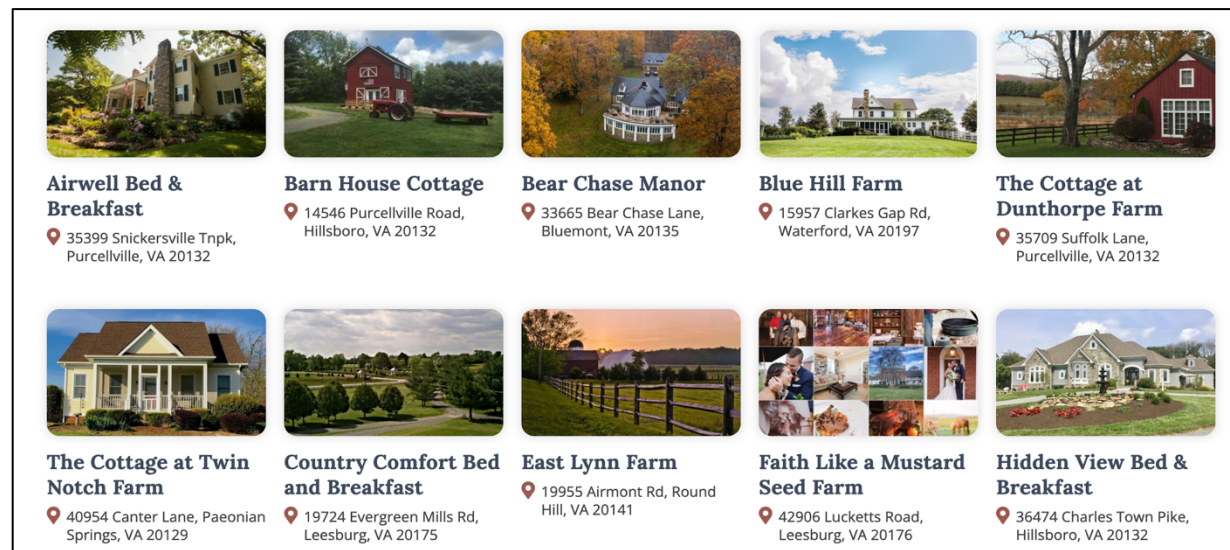


Figure 16 – A sampling of the BnBs of Loudoun County, 2023. Source: Visit Loudoun.



## Water Resources

River and Stream Corridor Resources (RSCR) consist of rivers and streams that drain 100 acres or more, associated 100-year floodplains, adjacent steep slopes, and a 50-foot management buffer surrounding the floodplains and adjacent steep slopes. RSCRs constitute the County's largest natural ecosystem, supporting air quality, water quality, and biological diversity. The buffers help to maintain stream bank stabilization, temperature moderation, flood control, and aquatic habitat as well as filter nutrients and sediments from upland disturbances and adjacent development. The identification of buildable areas on a site will protect and preserve river and stream segments draining less than 100 acres and wetlands that are not part of the RSCR.

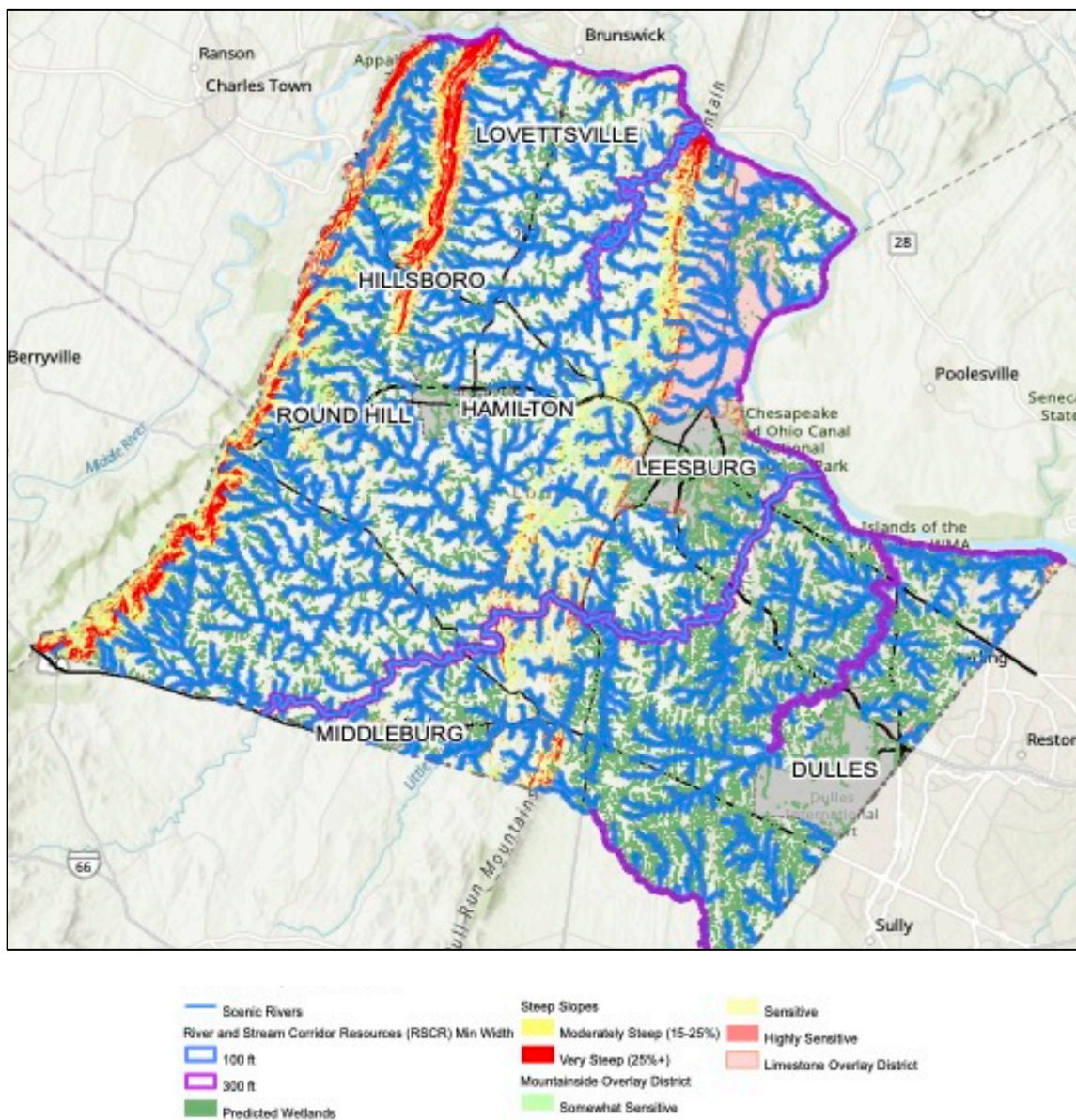


Figure 17 – Natural Resources of Loudoun County, 2024.

The County has two State-designated Scenic Rivers: Goose Creek and the segment of Catoctin Creek that runs from Waterford to the Potomac River. These scenic rivers are an important part of the County river and stream corridor system and are a part of the greater Chesapeake Bay Watershed.<sup>32</sup>

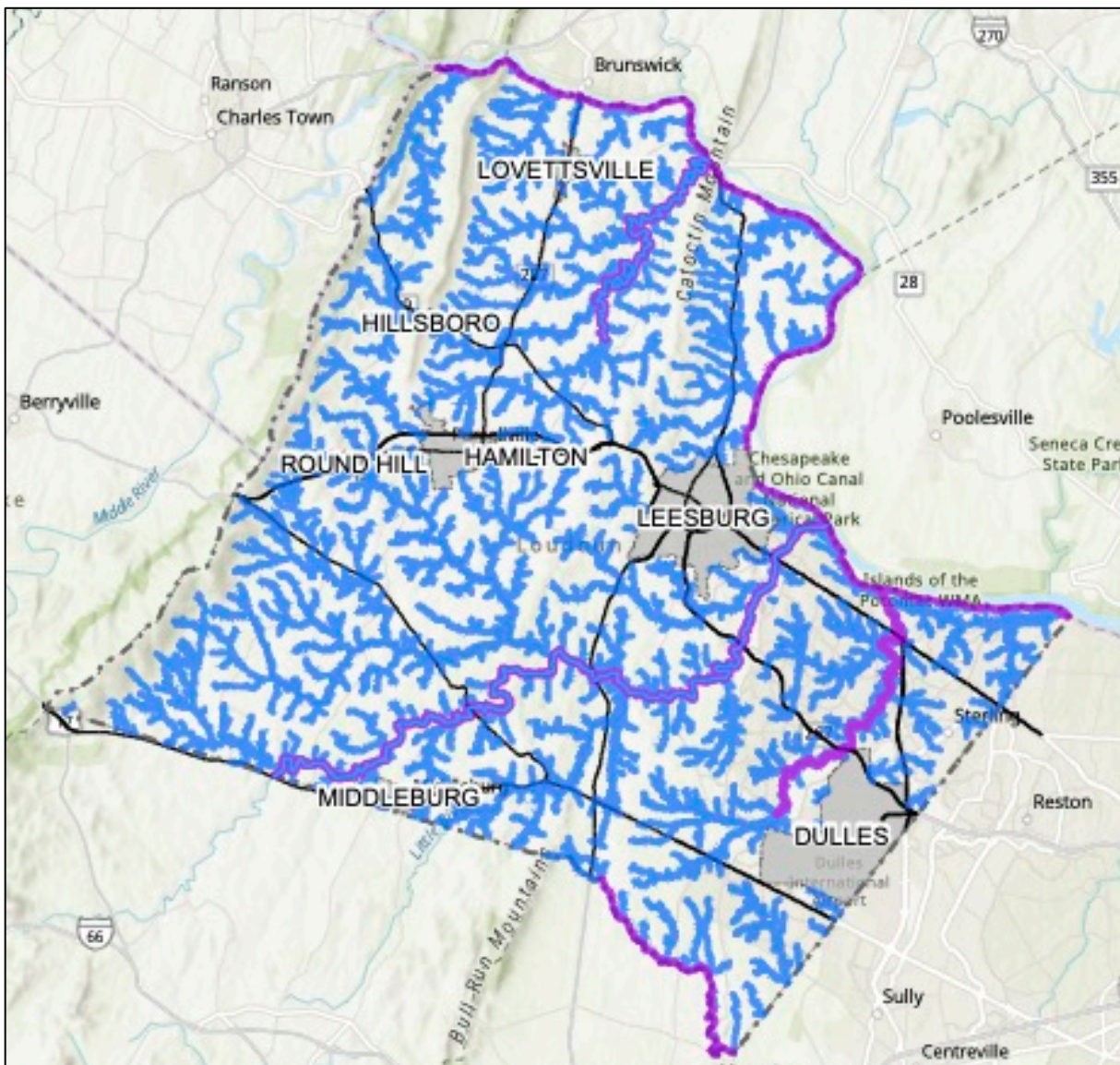
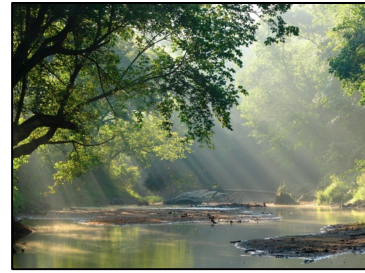


Figure 18 – Scenic Rivers & River and Stream Corridor Resources of Loudoun County, 2024.

<sup>32</sup> <https://www.usgs.gov/media/images/chesapeake-bay-watershed-boundary-usa#:~:text=The%20Chesapeake%20Bay%20watershed%2C%20or,case%20is%20the%20Chesapeake%20Bay.>



## Environmental Considerations for Digges Valley, Loudoun County

The area contains over four miles of creeks and tributaries to Crooked Run, a major tributary to Goose Creek. The Goose Creek stream system has been identified as an aquatic portfolio site in the Northern Piedmont by the Nature Conservancy's ecoregional planning process. It supports dense populations of sport-fish and a wide diversity of non-game fish species. Species include large and smallmouth bass, rock bass, pumpkinseed, bluegill, redbreast, bullhead, and green sunfish. The Goose Creek also supports several species of darters and daces which are indicator species for the health of the system.

The Property lies within an area identified by the Virginia Department of Conservation and Recreation, Division of Natural Heritage, as containing *Hesperia attalus slossanoe*, the dotted skipper (a butterfly), a G2G4T2T3 SH ranked species; and within two miles east of area containing *Salix exigua*, the sandbar willow (a shrub), a G5S1 ranked species.

### Reservoir Protection Area

Loudoun County has a Reservoir Protection Zone for the land area draining to the reservoirs. It is outlined on the map in maroon and aligns with the eastern border of the Goose Creek watershed in the Suburban Area. It sets out a more protective standard for development.

Each new development contributes a new load of runoff laden with sediment, nutrients, and toxins. The County is charged with monitoring soil and erosion preventive measures carefully to make sure that they are properly maintained.

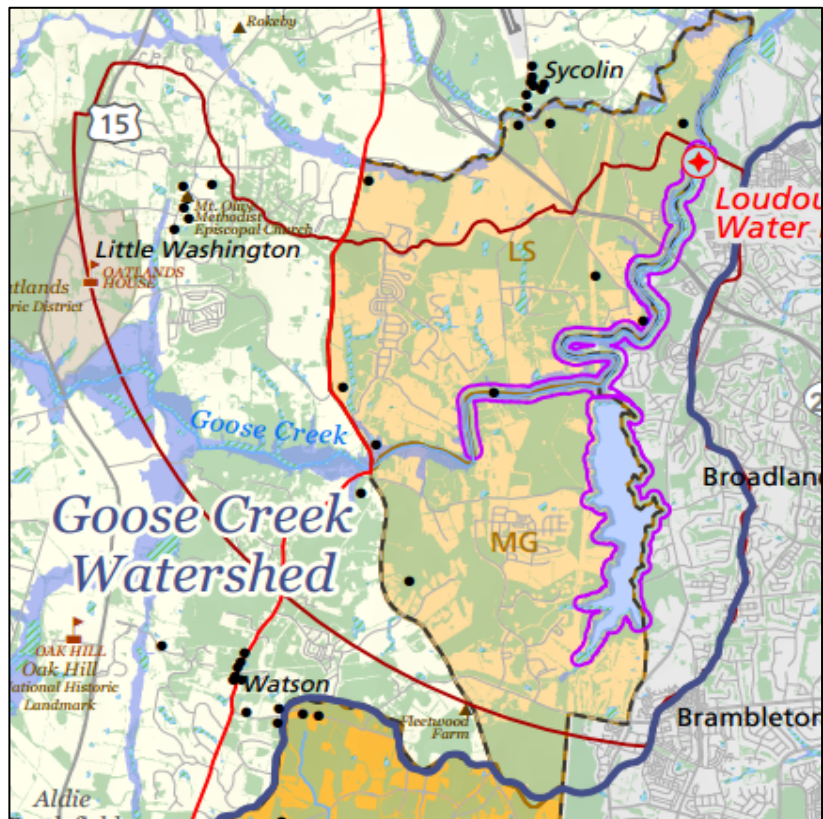


Figure 19 – The Goose Creek Watershed of Loudoun County, 2024.

## Limestone Overlay District

An area of approximately 18,000 acres (approximately 5.5 percent of the County) that lies predominately north of Leesburg and east of Catoctin Mountain is characterized as karst terrain (See Limestone Overlay District Map). Karst terrain refers to areas where mildly acidic water has gradually dissolved the underlying limestone and other carbonate rocks, creating a landscape characterized by underground cavities, sinkholes, and springs. These areas are susceptible to increased cavity collapse, ground slippage, groundwater pollution, and threats to the stability of foundations and structures. In 2010, the Board of Supervisors (Board) adopted amendments to the Zoning Ordinance that established the Limestone Overlay District (LOD), which regulates development in karst areas.

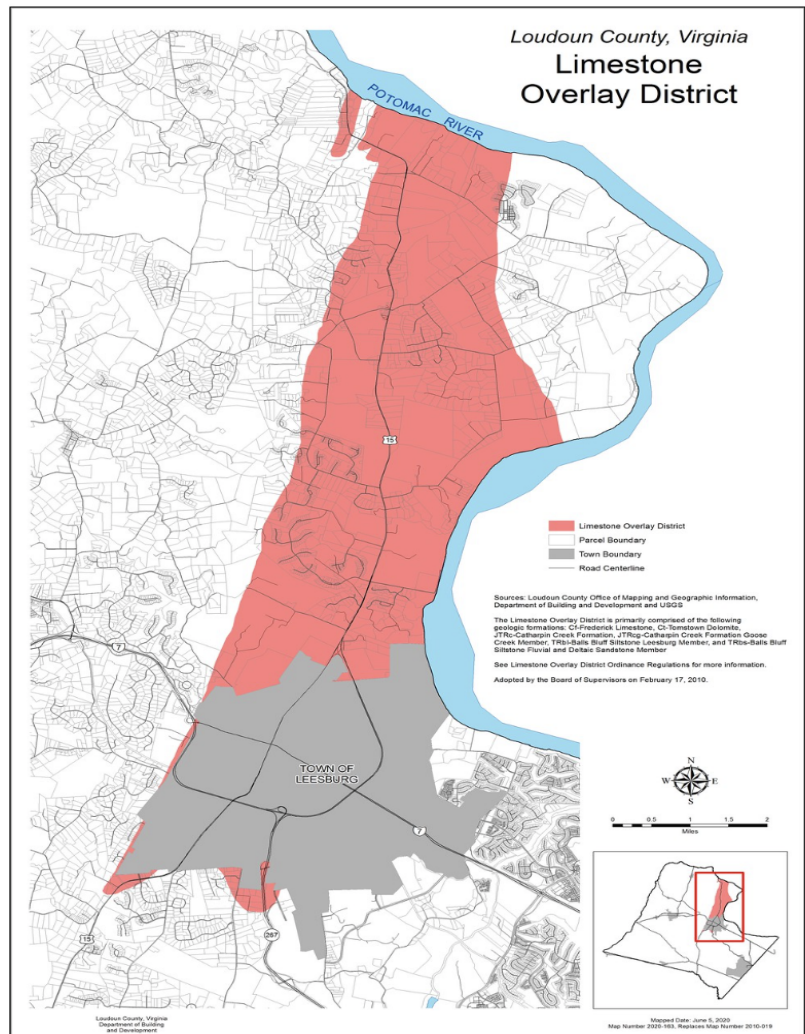


Figure 20 – The Loudoun Limestone Overlay District, 2020.

## Mountain Overlay District

Loudoun's mountains are a valued environmental resource and distinctive feature of the County's scenic beauty. Mountainsides contain headwaters to many of the County's streams and are identified as a critical groundwater recharge area for western Loudoun County. Residents, visitors, and rural businesses value the scenic vistas that the hills and mountains provide. They are also highly sensitive to land disturbance and development. In addition to the destruction of prime viewsheds, uncontrolled land disturbance within these areas can cause major soil slippage, debris flows, or landslides. The Zoning Ordinance regulates these areas through the Mountainside Development Overlay District (MDOD). The MDOD contains land use restrictions and performance standards to minimize the destruction of individual resources and the disturbance of the ecological balance of these resources.



## **Friends of the Blue Ridge Mountain - Challenging Transmission Line Technology**

<https://friendsofblueridge.org/>

Fifty years ago, the Appalachian National Scenic Trail did not enjoy its current level of protection. The National Park Service did not own the land along the Blue Ridge traversed by the Trail, nor did it own the corridor lands surrounding the Trail. Friends of Blue Ridge Mountain did not exist, and Sweet Run State Park was a farm. All these advances in public access to, and enjoyment of, this portion of the Blue Ridge have occurred since then.

If FirstEnergy proposes simple replacement of the existing 138kV line by a conventionally designed and built 500kV transmission system, underslung with a 138kV line, great harm to the Blue Ridge's several interacting natural and human systems would result from construction of industrial scale infrastructure on steep slopes, storm runoff and soil erosion, particularly with ever increasingly intense rainfall from climate change. Mammoth scale towers dominating the landscape would markedly adversely affect many users of the Appalachian Trail and Sweet Run SP including adverse noise impacts. The historic heritage of Sweet Run valley would be overshadowed and the pristine nature of the Blue Ridge viewed from a distance would be irreparably marred.

*FBRM* understands that alternative approaches exist to mitigate impacts from developing new transmission capacity in these two areas. For example, if the cables on existing transmission lines in western Loudoun were replaced with Advanced Composite Core Cables, it may be possible that the need for First Energy to rebuild its line across the Blue Ridge might no longer be necessary.

## **Plant and Wildlife Habitats**

Plants and animals play an important role in nature's lifecycle and its ecosystems. For wildlife habitats, large contiguous parcels of natural open space are preferable to more numerous but disconnected and smaller areas. The creation of a larger network helps ensure the viability of the habitat. The County still has several unique and natural habitat areas. The largest contiguous areas of forest and naturally vegetated land are on mountainsides, steep slopes, and along stream channels. These areas play a key role in preserving the abundance and diversity of the County's remaining plant and wildlife resources. *The County strives to protect, preserve, and create large-scale plant and wildlife habitats that overlap with other important resources and resource systems, and will also protect rare, threatened, and endangered plant and animal species habitats in accordance with the federal Endangered Species Act.*

The construction and maintenance of above-ground power lines require clearing large swaths of land and cutting down native trees. This process *disrupts local ecosystems, leading to habitat loss and fragmentation for many species*. Once power lines are erected, they can also pose significant risk to local wildlife. This is particularly true of large bird species such

as eagles and hawks. These birds are at risk of colliding with exposed power lines, which often results in injury or death. The US Forest Service reports that “collisions with power transmission and distribution lines may kill anywhere from hundreds of thousands to 175 million birds annually.”

In addition, according to the *Loudoun Wildlife Conservancy (LWC)*, when the path of a transmission line bisects greenspace, it creates an edge effect on the habitat. Edge effects occur when an unnatural interrupter (such as a road or utility corridor) disrupts contiguous habitat. This disruption can have serious ecological consequences, such as limiting population dispersal, constricting gene flow, and creating community imbalances from increased mortality. Edge effects are also known to be directly linked to population imbalances in deer- as is seen in Loudoun County as the first in the state for deer collisions due to habitat disruption. Contiguous habitat, such as that found in western Loudoun, is vital to the health of Loudoun’s ecosystems as a whole.

#### Resident Testimonial

“I leave the city to come home to my little farm. My kids have chickens, we are planning on raising our own meat. On any given day I'll see owls, foxes, hawks, the local bald eagle, and deer on my property. This is why I moved here. We don't want the urban life.

Go to my website at [www.capturinghisglory.com](http://www.capturinghisglory.com) and see why I live here with my family. “

*Eric from Lovettsville*

The most vital habitat which remains contiguous in Loudoun is that found along riparian corridors. Power lines that cross streams bisect riparian corridors which often correspond to vital ecological cores. This bisecting of riparian areas further increases edge habitat and lowers the quality of the habitat that is left following construction. Transmission lines that cross creeks and streams pose threats to a larger community of wildlife by disrupting both terrestrial and aquatic habitats.

#### Resident Testimonial

“The transmission lines will scar the landscape and ruin the unique and special beauty that is rural Loudoun County...It will harm the wildlife beyond the damage done by continued housing development.”

*Kimberley from Waterford*

Impacts of the constructed transmission lines have a potential to impact several of our organizational programs. The LWC hosts regular bird walks, nature walks, and amphibian and bat monitoring in areas which could be traversed by the transmission lines. The negative effect of the loss of habitat from the transmission lines is likely to have an effect on the engagement of our members with wildlife at these locations in close proximity to any lines that may be constructed.<sup>33</sup>

<sup>33</sup> Xia Shangguang Zhao Yuan. “Influences of 500kV Transmission Lines on Wetland Ecosystem and Its Protective Countermeasures—A Case Study of the Lake Wetland

Natural Reserve along the Yangtze River in Anqing City.” 气象与环境研究:英文版 4 (2016): 17–22. Print.

[https://www.gov.mb.ca/sd/eal/registries/5750mbhydrombminnesota/cec\\_docs/sscceccroun d2\\_ir397part2.pdf](https://www.gov.mb.ca/sd/eal/registries/5750mbhydrombminnesota/cec_docs/sscceccroun d2_ir397part2.pdf)

The concerns of the LWC with the impact of the transmission lines on habitat come to a head with specific species of concern. It understands that NextEra will be conducting a due diligence assessment of established data of endangered and threatened species that may have nesting grounds near the chosen route as is required by law. However, due to the vast swaths of private property which the transmission line may traverse, LWC believes that the actual number of nesting and breeding grounds for endangered, threatened, and species of concern is higher than that which is reflected in established databases.

#### **Plant and Wildlife Habitat Impacts – The Case of “Two Sister Bees”**

Bees are responsible for approximately 80% of insect pollination. Two Sister Bees on Householder Road in Lovettsville raises some of those bees. This apiary has been raising honeybees for approximately 8 years for both honey production and bee colony reproduction. The proposed route of the transmission line would run right through the property where the hives are located. Raising bees is not easy. It takes a lot of work to keep them thriving. Weather, skunks, possums, bears, wasp, hornets, lantern flies, and parasitic mites all put stress on the bee hive and are major contributors to the collapse of the bee hive colonies in our surrounding area and throughout the nation. Fighting Mother Nature is hard before we add any man made “influences” like massive transmission power lines.

Several articles on beekeeping state that acute exposure to extremely low frequency Electro-magnetic fields (ELF EMFs) “by transmission power lines” were found to impair the “Cognitive and Motor” abilities of the honey bee, i.e., their ability to forage towards food sources and feeding. *Studies have led to a precautionary federal recommendation in the USA to **not** keep bee hives under powerlines. Furthermore, research shows that crops close to the power lines remain unpollinated, which reduces the food production for the bees and if herbicides are used to control the ground cover under the power lines, the herbicides are now found to be very harmful to both humans and bees.*

Two Sister Bees has 20 hives and other apiary farms in Lovettsville have as much as 30 to 60 hives per farm. Each hive consists of 40,000 to 100,000 bees. Since honeybees can forage up to a range of 2 to 5 miles, the transmission lines will be within that Lovettsville radius for all of the apiaries. *NextEra needs to rethink its positioning and installation of transmissions towers in our rural area, as causing a decline in pollinator species will significantly compromise agricultural production.*

#### **4. The Partnership with the Loudoun County Government**

At its meeting of April 16, 2024, the Loudoun County Board of Supervisors considered a Resolution regarding NextEra's proposed Western Loudoun route for its new 500kV electrical transmission line. The Resolution was sponsored by the Board's Supervisors for the Catoctin and Leesburg Election Districts.

***County Staff recommended that the Board adopt the Resolution***, which expresses the County's opposition to the proposed Western Loudoun Route and encourages electrical utility providers to cooperate in using existing power line corridors in Virginia, West Virginia, and Maryland to co-locate the 500kV electrical transmission lines.

While Staff noted that there are no fiscal impacts associated with adopting the Resolution, it also stated that, in the event there is no change to the proposed Western Loudoun Route, Loudoun County may need to participate in proceedings to oppose approval of the Western Loudoun Route. ***The County will likely incur significant expenses retaining outside counsel and experts.***

Staff and the Board sustained the LTLA view that NextEra's proposed Western Loudoun Route would (1) run through mountainous, rural, historic, environmentally sensitive, and productive agricultural areas, through the Village of Waterford, and near the Town of Hamilton and the Village of Paeonian Springs to the Aspen substation outside the Town of Leesburg, and (2) negatively impact natural, environmental, and heritage resources, local businesses in the agricultural, equine, hospitality, and tourism sectors, National Historic Landmarks and properties on the National Register of Historic Places, agricultural and forestal districts, open space and conservation easements, and residents living in the area.

**The Loudoun County Board of Supervisors adopted the Resolution below by a vote of 9 – 0.**



# **RESOLUTION OPPOSING NEXTERA ENERGY'S PROPOSED NEW HIGH VOLTAGE TRANSMISSION ROUTE THROUGH WESTERN LOUDOUN COUNTY AND ENCOURAGING THE USE OF EXISTING ELECTRICAL TRANSMISSION RIGHT-OF-WAY**

**Adopted by the Loudoun County Board of Supervisors this 16<sup>th</sup> day of April 2024.**

WHEREAS, on December 11, 2023, the Transmission Expansion Advisory Committee of PJM gave preliminary approval to NextEra Energy's Proposal 853 to run new high voltage transmission lines from a new substation on the West Virginia-Virginia border, the "Woodside" substation, to the Aspen substation located in Loudoun County near Cochran Mill Road (Western Loudoun Route); and

WHEREAS, the Western Loudoun Route runs in a southerly and easterly direction from West Virginia through mountainous, rural, historic, and productive agricultural areas, through the Village of Waterford and near the Town of Hamilton and Village of Paeonian Springs to the Aspen substation outside of the Town of Leesburg; and

WHEREAS, the Western Loudoun Route will negatively impact natural, environmental and heritage resources, local businesses in the agricultural, equine, hospitality, and tourism sectors, National Historic Landmark and National Register Historic Districts and sites, agricultural and forestal districts, open space and conservation easements, and residents; and

WHEREAS, citizens, businesses, and environmental, historic, and preservation groups have expressed their opposition to the Western Loudoun Route and expressed their concerns about the impact it would have on businesses, tourism, and the quality of life in Loudoun County; and

WHEREAS, existing power lines rights-of-way exist that could accommodate the new high voltage transmission lines and bring the electrical power to the Aspen substation.

NOW, THEREFORE, BE IT RESOLVED, that the Board of Supervisors declares its opposition to the Western Loudoun Route proposed by NextEra Energy and encourages NextEra Energy to work with the electric utility providers in Virginia, West Virginia, and Maryland to collocate the new transmission lines in exiting electrical transmission corridors.

ATTEST:

Tim Hemstreet, Administrator

Phyllis Randall, Chair, Board of Supervisors

## Loudoun Transmission Line Alliance

### Individual Members at May 31, 2024

The original Petition was signed by 1294 individuals and the following 731 individuals and another 183 Loudoun residents have signed the LTLA Declaration - a total in all of 2,208 individual signers. <sup>34</sup>

- |                                                                                                     |                                                  |                                                                              |
|-----------------------------------------------------------------------------------------------------|--------------------------------------------------|------------------------------------------------------------------------------|
| 1. Eleanor Adams- Catoctin Creek Scenic River Advisory Committee and the Catoctin Preservation Fund | Farms and Other Local Western Businesses         | 47. John Beisler- Resident                                                   |
| 2. Jorge Adeler- Resident                                                                           | 23. Michelle Bahe- Visitor and Preservationist   | 48. Mark Beisler- Resident                                                   |
| 3. Miriam M Adkins- Resident                                                                        | 24. David W. Baker- Resident                     | 49. Tricia Beisler- Resident                                                 |
| 4. Aliza- Resident                                                                                  | 25. Robert Banner- Resident                      | 50. Alexander Behan- Resident, Waterford Foundation                          |
| 5. Alison Akerly- Resident                                                                          | 26. Ryan Bannon- Preservationist                 | 51. James J. Behan- Resident, Waterford Foundation                           |
| 6. Emmanuel Alliot- Resident                                                                        | 27. Janelle Banta- Resident                      | 52. Ann Belland- Resident                                                    |
| 7. Rohit Amba- Preservationist                                                                      | 28. Dawn M. Barclift- Virginia Resident          | 53. Sharon Bendekovic- Concerned Neighbor                                    |
| 8. Wafa Amm- Resident                                                                               | 29. Sharon Morgan- Barnhart- Resident            | 54. Brandi Benedict- Resident and Horse Training Facility                    |
| 9. Catharine Anderson- Resident                                                                     | 30. Paul Bateman- Resident                       | 55. Jodi Benedict- Equine Farmer                                             |
| 10. Kevin Anderson, Executive Director- Loudoun County Brewers Association                          | 31. Audrey Batterman- Resident                   | 56. John Benedict- Resident                                                  |
| 11. Angelina- Resident                                                                              | 32. Jennifer Barrett- Resident                   | 57. Mark Benedict- Resident                                                  |
| 12. Aubrey Arnold- Resident                                                                         | 33. Rod Bartlett- Resident                       | 58. Ronald Benschoter- Resident                                              |
| 13. Clemens Arnold- Resident                                                                        | 34. Sherri Bartlett- Resident and Business Owner | 59. James Alexander Behan- Resident                                          |
| 14. Erik Arnold-Resident                                                                            | 35. Basia- Preservationist                       | 60. Karen Bennett- Resident                                                  |
| 15. Maureen Arnold- Resident                                                                        | 36. Virginie Bauer- Preservationist, Mother      | 61. Michael G Benett- Resident                                               |
| 16. Rebekah Asselin- Resident                                                                       | 37. Elizabeth Bava- Resident                     | 62. Sonja Benson- Resident                                                   |
| 17. James Audia- Concerned Virginian                                                                | 38. Carrie Beach- Resident                       | 63. Joan Berardo- Resident and Preservationist                               |
| 18. Mr John B Auditore- Resident                                                                    | 39. Charles Beach- Farmer                        | 64. Jason Berry- Resident and Visitor for Cycling Those Amazing Gravel Roads |
| 19. Paul Austin- Resident                                                                           | 40. Jill Beach- Resident                         | 65. Richard P Biby- Resident                                                 |
| 20. Pamela Austrich- Waterford Resident                                                             | 41. Marlena Beach- Farmer, Resident              | 66. Lisa Bice- Resident                                                      |
| 21. Anita Baarns- Resident                                                                          | 42. Jeffrey Bean- Resident, Preservationist      | 67. Phil Bice- Resident                                                      |
| 22. Alison Badger-Resident and Small Business Owner Working with                                    | 43. Amber Becker- Resident/ Conservancy Lot      | 68. Aaron Bickant- Resident                                                  |
|                                                                                                     | 44. David Bednarik- Resident of Waterford        | 69. Molly Bilen- Waterford Citizens' Association                             |
|                                                                                                     | 45. Peggy Bednarik- Waterford Resident           | 70. Linda Black- Resident                                                    |
|                                                                                                     | 46. Wynne Beers- Visitor                         |                                                                              |

<sup>34</sup> See - <https://www.change.org/p/oppose-500kv-transmission-lines-proposed-through-western-loudoun-and-waterford-nhl> and [https://docs.google.com/document/d/1rL89ydK5I6X\\_M24M7VHKjf4ssl-xVUzeRqS-T7wcMqo/edit](https://docs.google.com/document/d/1rL89ydK5I6X_M24M7VHKjf4ssl-xVUzeRqS-T7wcMqo/edit)

71. Laurel Blakemore- Resident
72. Karyn Blanc- Resident
73. Whitney Blanchard- Farmer, Preservationist, Resident
74. Chris Blaszc- Resident
75. Jennifer Blevins- Resident
76. Paula Bliss- Farmer
77. Daniel Bock- Friend of Belmont Farm
78. Kelsea Bordoe- Preservationist
79. Dan Bordes- Resident
80. Margaret and Bob Bocek- Residents, Preservationists, and Environmentalists
81. Chris Borneman- Resident
82. Julie Boreman, Watermark Woods- Native Plants- Resident and Small Rural Business Owner
83. Christine Borgelt- Resident
84. Claudia Borgelt- Resident
85. John Borgelt- Resident
86. Jeff Boogaard- Cannabreeze Hemp Farm & Company
87. Corey Boudreau- Resident
88. Jennifer Boudreau- Resident
89. Dinns Bours- Resident
90. Tim Bowers- Resident
91. Bonnie Branding- Resident, Farmer, Agricultural Business Owner, B&B Owner, Brewery Owner
92. Theodor Edward Bratrud- Resident
93. Charles Bremer- Resident
94. Susan Bremer- Resident
95. Jerry Briggs- Resident
96. Tara Briggs- Resident
97. Donald Brill, Jr.-Resident
98. Debbie Buckley- Resident
99. Steffanie Burgevin- Farm and Preservationists
100. Sarah Burke- Resident
101. Ben Burns- Farmer, resident
102. Dancer Burns- Resident
103. Daniel Burns- Resident
104. Paula Byrne- Resident
105. Kerry Bzdyk- Resident, Master Naturalist
106. Kendra Campbell- Resident
107. David Capritta- Farmer, Resident
108. Mauricio Carrasco- Citizen
109. Ashley Cash- Farmers at Flora and Fauna Farmstead in Lovettsville
110. Ben Carroll- Resident, Patron of Businesses
111. Debby Caulfield- Resident
112. Carolee K Chamberlin- Preservationist and Former Resident
113. Marion Chamberlin- Previous Resident (I grew up in Waterford)
114. Rebecca Chamberlin Rider- Former Resident of the Village of Waterford
115. Nikhita Chawla- Resident
116. Vibha B. Chawla- Resident
117. Christopher- Virginia Resident
118. Ben Choe- Visitor
119. Ann E. Crepin- Resident
120. Kay Chewing- Resident
121. Christina Christoforou- Resident
122. Lauren Clawson- Resident, Farmer
123. Paige Critchley- Paige's Pit Stop- Farm Market; Western Loudoun Reservations LLC- Short-term Rentals
124. Melinda Cohen- Horse Trainer
125. Katherine Collins- Farmer
126. Matthew Conte- Resident
127. Tara J. Connell- Resident
128. Caitlin Conn- Resident
129. Patric Edward Copeland- Resident
130. Chris Cook- Homeowner Resident
131. Christin Cook- Resident- Homeowner
132. Cynthia Cooper- Resident
133. Gretchen Condy- Resident
134. Collins Conover- Resident
135. Stephanie Cornejo- Resident and Preservationist
136. Eugene Couser- Resident
137. Brad Covington- Resident
138. Paige Sillman Cox- Waterford Resident
139. Ursula Cox- Resident
140. Ann E Crepin- Resident
141. Melinda Croft- Resident in Historic Neighborhood
142. Kathryn Cruise- Resident
143. Bob Cvaine- Preservationist
144. Andrea Cubelo-McKay- Resident
145. Abigail Tiller Cutter- Resident
146. Bowman Cutter- Resident of Waterford for 71 Years
147. Maryam Dadkhah- Preservationist
148. Conor Dancy- Resident and Cyclist
149. Daniel-Resident
150. M. Brooke Darby- Resident
151. Robin Darter- Resident
152. David Dawson- Farmer and Resident
153. Petrina Dawson- Farmer and Resident
154. Johnson David- Family of Residence
155. Lydia Davidson- Farmer
156. Emily Day- Farmer
157. Matthew Dehler- Resident
158. Judy DeMar- Judy DeMar
159. Kris Dennen- Resident/ Loudoun County Equine Alliance
160. Jon Deretchin- Resident
161. John Derry- Resident
162. Libby Devlin- Rockland Farm LLC
163. Elizabeth Devlin- Rockland Farm LLC
164. Diana Dezern- Resident

165. Harriet Dickerson- Resident and Farm Owner
166. Mike Dickerson- Resident and Leesburg Business Owner of Plum Grove Cyclery
167. Andrew Diffenderfer- Resident
168. Jen Diffenderfer- Resident
169. Kyle DiVito- Resident and Preservationist
170. Valerie DiVito- Resident
171. Matt Donnelly- Resident
172. Carol C. Donovan- Resident of the Area
173. Fred Donovan- Resident
174. Sheila Douglasson- Resident
175. Douglas and Holly- Old Wheatland Estates
176. Deb Dramby- Resident and Farmer
177. Joe Drumheller- Resident
178. David Ducharme- Resident and Parent
179. William Duffy- Resident
180. Susan Dunk- Resident
181. Bill Dunn- Resident
182. Celeste Durarte- Resident and Business Owner
183. Ruthanne Eastwood- Resident
184. Christopher Eccleston- Resident
185. Jennifer Eccleston- Waterford, VA Resident
186. Rosie Edmond- Visitor
187. David Edmundson- Resident
188. Catherine Emerson- Resident
189. Emily Hotaling Eig- Resident and Preservationist
190. Michael J. Eig- Resident
191. Barbara Elbeze- Resident
192. Suzanne Elbeze- Resident
193. Doug Elliot- Resident
194. Carl Emanuel- Resident
195. Elizabeth Emanuel- Resident
196. Arva Estep- Resident
197. Karla Etten- Etten's Eden- Nursery, Cut Flower Farm
198. Susan Fahey- Preservationist
199. Amy Farmer- Resident and Conservation Proponent
200. Paul C Farmer- Resident
201. Daniel Fedick- Farmer
202. Deanna Feddersen- For the Farmers
203. Samantha Feinstein- Farmer and Resident
204. Richard Feldman- Resident
205. Bob Fells- Resident
206. Frances Ferrara- Community of Loudoun County
207. Anthony Ferraro- Richards Run Resident
208. Judith Ferraro- Richards Run Resident
209. Michele Ferreira- Resident
210. Elizabeth Ferry- Resident
211. Kimberly Ferry- Resident
212. Maryann Fialdini- The Barns at Hamilton Station Vineyards
213. Penney Powell Fields- Resident
214. Janice Fish- County Resident
215. Rachel Fischer- Resident
216. Mike Fitzgerald- Farmer
217. Michael Flanagan- Loudoun County Resident
218. Thomas E. Flanagan- Resident
219. Wanda Flanagan- Resident
220. Brent Feito- Resident
221. Chris Fennell- Resident, Farm Land Owners
222. Leigh Flajnik- Resident
223. Kyle Fleischmann- Preservationist
224. Brittany Fleming- Resident
225. Kelly and Phillip Foltman- Farmer, Resident, Business Owners: Dunthorpe Farm, Dunthorpe Veterinary, Dunthorpe Cottage BnB
226. Emily Fort- Preservationist
227. Robin Fortney- Resident
228. Kathy Franco- Rural Loudoun Preservationists
229. Ashley French- Preservationist
230. Elizabeth Fugal- Resident
231. Joyce Fuller- Resident and Environmentalist
232. Denise Fumagali- Resident
233. Raul A. Fumagali- Resident
234. Kathleen A Funk- Laurel Hills Farm, Farmer, Resident, and Preservationist
235. Michael Gaffrey- Resident
236. Debbie Galuski- Resident
237. Barbara F. Gardner- Resident
238. Tommy Gardner- Resident
239. Michelle Garman- Resident
240. Nate George- Resident
241. Bonnie L Getty- Resident
242. Kelly Gibson- Resident
243. Timothy Gibson- Resident
244. Paul J Giganti- Resident and Farmer
245. Carla Giacomangeli- Resident and Farmer
246. Shannon Elizabeth Gibbons- Other
247. Heidi Giffuni- Resident
248. Geoffrey Giffuni- Resident
249. Bonnie Gillen- Resident
250. Brendan Gilmore- Resident
251. Megan Gilmore- Residential
252. Michelle Gilmore- Resident
253. Kristen Anne Golden- Self
254. Margaret Good- Retired Dir Preservation for Waterford Foundation
255. Dolores Goodson- Western Loudoun Resident
256. James Goodson, Jr.- Western Loudoun Resident
257. James Gosses- Resident



258. James C. Gordon- Farmer
259. Mary Gordon- Farmer
260. William Gordon- Resident
261. William T Gordon- Resident
262. Travis Graham- Resident
263. Kathryn Granger- Equestrian Resident
264. Paul Greer- Resident
265. Sara Greer- Resident
266. Kevin Greenleaf- Sunny Knoll EcoFarm
267. Brian Grimes- Resident
268. Jill Grimes- Resident
269. Chris Grivas- For Resident
270. Annie Grotophorst- Resident
271. Wally Grotophorst- Resident
272. Sarah Jane Gruber- Visitor
273. Mary Gustafson- Resident
274. Matt Guillaume- Resident
275. Erin Gulick- Resident and Open Space Easement Holders
276. Dina Gusinac- Resident
277. Bruce Guyton- Resident
278. Linda Guyton- Resident
279. Abby Hacecky- Resident
280. Michelle Hacecky- Richards Run Resident
281. Vance Hacecky- Richards Run Resident
282. Carrie Hall- Resident
283. Jud Hallman- Resident, Farmer- Livestock
284. Mary Hamilton- Resident
285. Heather Hancock- Resident
286. James Hanna- Resident and Preservationist
287. Charles M. Hansen III- Catoctin Creek Scenic River Advisory Committee
288. Christopher Hatch- Agriculture/Farmer, Mill Road Farm, Inc.
289. William T Hatch- Scenic Loudoun Legal Defense, Wine Grower, Beef Farmer
290. David Harkins- Preservationist/ Family of Residents
291. Henry Harris- Conservation Easement Holder
292. Joyce Harris- SLLD, Property Owner
293. Griffith Harrison- Resident
294. Gail Donovan Harkins- Family Member
295. Audrey Harkins- Resident
296. Julie Harner- Local Resident and Cyclist
297. Natalie Hartmann- Resident
298. Andrew Harvey- Resident
299. Alistair Hastings- Frequent Visitor
300. Sharon Hays- Farmer and Resident
301. Betty Hedges- Resident
302. David and Janet Hedrick- Resident
303. Angela M Heller- Resident
304. Greg Henderson- Farmer
305. Thomas Hertel- Resident
306. L Heston- Resident
307. Julia Hill- Resident
308. Nichole Hinderer- Protect Watermark Woods & Conservation
309. Patrick Jay Hines- Resident
310. Maggie Hirschberg- Farmer and Environmentalist
311. Tara Holt- Resident
312. Sarah Holway- Resident and Farmer
313. Susan Honig-Rogers- Resident
314. Kris Hood- Resident
315. Marc Hood- Resident
316. Nathan Hood- Resident
317. Marcia Hoover- Visitor
318. Charles Houston- Farmer
319. Emily Houston- Resident
320. Theresa Howe- Resident
321. Kathleen Howsare- Resident
322. Carl Huber- Resident
323. Diana Huber- Resident and Farmer
324. Jeffery A. Huber- Nearby Resident
325. Marchi Huber- Resident
326. Sarah Hughes- Resident
327. Erika Huddleston- Resident
328. Grant Hughes- Resident
329. Jeffrey L. Hughes- Resident (2 homes in Rural Loudoun)
330. Michael Hulett- Resident
331. Joy Hunkins- Resident
332. David Hunt- Waterford Foundation
333. James P. Hutton- Resident
334. Mary F. Hutton- Waterford Resident
335. Susan Hubbuch- Resident, Waterfield Hamlet Neighborhood
336. Clyde and Terry Housel- Hiddencroft Vineyards
337. Gregg Hyde- Resident
338. Erin Hyman- Farmer
339. Joe Imwalle- Resident
340. Nicole Jackson- Waterford Foundation
341. Robert N Jackson- Resident
342. Corinne Jacques- Resident
343. Nicholas James- Resident
344. Glenn J. Jessee- Resident
345. Amanda E Johnson- Customer
346. Kitty Johnson- Resident
347. Robin Jones- Resident
348. Julia Jubbuch- Resident
349. Diana Kaplan- Resident
350. Hannah Kaplan- Resident
351. Thariq Karva- Resident
352. Barbara Kauffman- Resident
353. Allison Kawinsly- Resident
354. Woody Kaye- Individual
355. Sue Kelleher- Resident
356. Susan Kelleher- Resident, Preservationist, Artist
357. Tim Kelleher- Resident
358. Ellen Kelley- Farmer, Resident
359. Maryann Kelley- Resident Taxpayer
360. Ryan Kelley- Resident
361. Shaun Kelley- Farmer, Resident
362. Stacy Kelly- County Resident

363. Tim Kelly- Resident
364. Mary Kenesson- Resident
365. Stephanie Kenyon- Resident of the National Historic Landmark of Waterford Virginia
366. Silbyl Ketcham- Preservationist
367. Brian King- Superlative Events
368. Stephen Kirsch- Resident
369. Kaleigh Knill- Supporter of Farms
370. Carol Knoblach- Farmer and Preservationist
371. Kurt Knoblach- Farmer
372. George Kohlweiler- Resident
373. Cecelia Kope- Resident
374. Cathy Kotch- Resident of Waterford
375. Gwendolyn Kreider- Resident
376. Andrew H Kropp- Resident
377. Kenneth M. Kukovich- Western Loudoun Resident
378. Susan Kvensnicka- Resident
379. Chris Javens- Preservationist
380. Andrea Justus- Resident Preservationist
381. Jessica Kutzler- Resident
382. Elizabeth LaBella- Foster- Resident
383. Roger Lancaster- Resident
384. Bob Landers- Resident
385. Allison Lanham- Preservationist
386. John Lanham- Former Resident
387. Neal and Elzbieta Larabee- Resident
388. George C. Laudenbach- Resident
389. Annie Lauderback- Resident
390. Catherine Lauderback- Resident
391. Clare Lauderback- Resident
392. Emily Lauderback- Small Farm Owner
393. John Paul Lauderback- Resident
394. Stefanie Lave- Resident
395. Luceil Lazawitz- Homeowner
396. Sara Miller Leary- Equestrian Resident
397. Mike Leigh- Farmer, Resident, and Preservationist
398. Carol Lenhart- Resident, Farmer, and Business Owner
399. Edward Lehmann- Resident
400. Marie Lenko- Resident and Farmer
401. Tracy Lewis- Consumer of Products Grown, Produced, and Sold in this Area
402. Robin Linn- Home Owner
403. John Litchfield- Resident
404. Sandra K. Lockhart- Western Loudoun Resident
405. Mark Long- Resident
406. Mary Looney- Resident
407. Judy Loose- Resident, Business Owner
408. Clarke Lunara- Resident, Environmentalist, Educator
409. Jordan Lunara- Resident
410. Kathryn Maad- Resident
411. Luke MacDonald- Resident
412. Juliana MacDowell- Land Owner- Resident
413. Janet Maday- Farmer, Resident, Preservationist, and Equestrian
414. Eric Madigan- Loudoun Land Owner/ Sustainable Agriculture Enthusiast
415. Maria Madigan- Resident
416. Mark D Madigan- Resident
417. Michelle Mahoney- Resident and Farmer
418. Scott Mallonee- Resident
419. Leslie Mangano- Resident
420. Susan Manch- Land Owner
421. William Manch- Resident
422. Sophia Maravell- Farmer and Resident
423. Stephanie Markey- Open Space Easement Community Member
424. Keisha Martin- Resident
425. Mary Mastapeter- Resident of Western Loudoun County
426. Tracy Mastro- Resident
427. Melissa Mathis- Virginian
428. Carol Matheny- Resident
429. Matt- Resident
430. Julie Mattison- Resident
431. Alexandra Mayer- Resident
432. Bill Mayer- Resident
433. Scott Mayer- Resident
434. William Mayer- Waterford Historic District Resident
435. Shie Mcaghl- Resident
436. Adam McCallen- Resident
437. Holly McCandless- Resident
438. Nancy McCartan- Resident
439. Laurie McClary- Resident and Property Owner
440. Sarah McCrae- Former Resident
441. Pamela McDorman- Preservationist
442. William J. McGinnis- Resident
443. Cindy McGrath- Farmer
444. Richard McGrath- Horse Trainer
445. Judy McHenry- Resident
446. Jill McKay- Resident
447. Sean McKay- Resident
448. Robert E. McKew- Scenic Loudoun Legal Defense
449. Chella McMahan- Farmers
450. Kenneth L. McWilliams- Resident
451. Ligia (Tia) McWilliams- Self, a homeowner in Waterford, VA
452. Ciara McMurtrie- I care about the farms
453. Megan- Resident
454. Lawrence Melton- Resident
455. Ann Menninger- Resident
456. Michael Merchant- Resident

457. Eleanore Meredith- Farmer, Blue Ridge Tree and Berry Farm. Preserve rural land proponent, Solar Energy Producer
458. Julia Metzger-Traber- Resident/ Potomac Vegetable Farms
459. Michael Meyrowitz- Resident
460. Carol Miller- Resident
461. Erin Miller- Resident
462. Jim Miller- Windswept Farm
463. Natalie Miller- Resident
464. Adrienne Mitchell- Resident
465. Lawrence Mitchell- Resident
466. Peggy Moats- Resident
467. Betsey Monroe- Resident
468. Brian Montgomery- Resident
469. Rachael Montgomery- Resident
470. Connie Wells Moore- Resident, Preservationist, Waterford Foundation
471. Joanna Moore- Wife of Land Owner
472. Peter Moore- Farmer/Landowner
473. Ted Morris- Resident
474. William Morris- Farmer
475. Cheryl Morrison- 3 easements, (Waterford, VA Dept of Historic Resources, Loudoun County Historic District), Terra Nebulo Winery, Member Loudoun Wineries and Wine Growers Association
476. Cindy Moseley- Resident
477. Kristina Moser- Preservationist and Resident
478. Carey Mottet- a Resident
479. Maureen Moutoux- Moutoux Orchard, Farmer
480. Susan Mulholland- Resident
481. Russell Mullen- Resident
482. Katherine Murphy- Loudoun Resident
483. Lauren Murphy- Preservationist
484. Kim Myers- Resident, Farmer
485. Melissa Myers- Farmer
486. Norman Myers- Goose Creek Association
487. John Nagiecki- Velopigs Cycling
488. Rich Napoli- Golden Springs Alliance
489. Derek Neal- Resident
490. Elizabeth Nelson- Resident
491. David Nelson- Co-Chair, Catoctin Creek Scenic River Comm.
492. Mark Newsom- Resident
493. Margaret Noel- Resident of Waterford
494. Diane Northern- Self
495. Martie Nottingham- Farmer/Resident
496. Anna Novaes- Farmer and Resident
497. John Joseph Novsk- Resident
498. Janelle Nowak-Santo- A Concerned Neighbor and Parent
499. Jennifer Nyce- Resident
500. Lilly Obrien- Resident
501. Jorge E. Ocasio- Velopigs Cycling Club
502. Timothy Odell- Resident
503. Chris O Donnell- Resident
504. Lisa O Donnell- Resident
505. Carlo Olivares- Resident
506. Stephen Ondra- Resident
507. Leanne O'Neill- Resident
508. Claire Ortuño- Preservationist
509. Deborah Overson- Preservationist and Farmer
510. Ryan Page- Frequent County Visitor
511. Keilan Palacios- Resident
512. Kimberley Partoll- Resident
513. Sarah Parker- Preservationist and Resident
514. Kaki Pearson- Resident
515. Kathleen O. Pearson- Resident
516. Ted Pearson- Resident
517. Olivia Pechstein- Property User
518. James Peter- Resident
519. Lisa Peter- Resident
520. Amy Piatt- Resident
521. Natalie Pien- Environmentalist, Climate Activist, Grandmother
522. Denise Pierce- Resident
523. Robert Pollard - Resident and Preservationist
524. Philip Porter- Resident
525. Connie A Potter- Resident
526. Polly Porter- Dunthorpe Farms HOA Board Member
527. Craig Powell- Loudoun Resident
528. Lowell Pratt- Resident
529. Julie Price- Resident
530. Eric Putnam- Resident
531. Diane Raitt- Farmer
532. Jack Raitt- Farmer
533. Nancy Ramsey- Resident
534. William Ranck- Resident
535. Rachel Rappaport- Friend of the Community
536. Matt Rasnake- Resident
537. Nicholas M Ratcliffe- Resident Waterford VA
538. Susan Rau- Resident and Employee
539. Erica Reck- Farmer
540. Mary Rentschler- Environmentally Concerned Citizen
541. Sigrid Fry-Revere- Resident
542. Holly G Rhodes- Resident
543. Katherine Ricart- Resident
544. David Rice- Preservationist
545. Ryan Rickey- Farmer
546. Boris Richard- Resident
547. Christine Richardson- Small Farms and Small Rural Businesses
548. Schuyler Richardson- Resident
549. Estelle Richer-Legault- Resident
550. Jennifer Richmond- Resident
551. Elizabeth Ritzman- Family

552. Rebekah Roberts- Resident, Landowner, and Owner of a Rural Small Business
553. Chris Robinson- Visitor
554. Elizabeth Robinson- Farmer
555. Joseph Robinson- Frequent Visitor to Loudoun County Agricultural Businesses
556. Lindesy Robinson- Recreationist and Preservationist
557. Nicole Roca- Farmer and Resident
558. Lori Rockwell- Wynant Farm Associates
559. Amy Rodriguez- Resident
560. P J Rodgers- NextEra Stockholder
561. Betty Rogers- Resident
562. Kristin O'Rourke- Local Farmer in Historic Village
563. Stephen Rose- Potomac Vegetable Farms
564. Lenora Friday Roth- Bel Mont Farm Employee
565. J. Kevin Ruedisueli- Resident
566. Ellen Scully-Russ- Vineyard Owner
567. Rurik- Bellemont Farm
568. Matt Ryan- Resident
569. Regina Ryan- Resident
570. Zoya Qadiri- Resident
571. Joseph Sacoo- Resident
572. Monica Sadeghi- Resident
573. Kim Sanborn- Resident farmer
574. Brian Sanders- Resident
575. Donald Sargent- Resident
576. Pat and Rolf Sartorius- Residents
577. Michele Savage- Resident
578. Savannah- Concerned Neighbor
579. Joseph Scalione- Resident
580. Curt A Schaber- Resident
581. Amanda Schatzman- Resident and Preservationist
582. James Schnaible- Resident/ Farmer
583. Linda Schnaible- Farmer and Resident
584. Jordan Scharan- Resident
585. Elizabeth D Schellenger- Preservationist
586. Josie Schoffstall- Resident
587. Carly Schrager- Visitor
588. Joan Schultz- Resident
589. Teresia F. Scott- Resident
590. Saranne Segal- Equine Industry- Little Horse Farm Boarding Facility
591. Megan Seldon- Farmers and Residents!
592. Rachael Semmes- Resident
593. Daniel Scrafford- Preservationist
594. Travis Shaw- Virginia Piedmont Heritage Area
595. Steve Sheckels- Resident near path of proposed transmission lines
596. Lee Shields- Loudoun County Resident
597. Michael Shields- Shieldshyre Farm
598. James Shipley- Resident
599. Pam Siek- Resident
600. Paul Siker- Rosemont Farm @ Trevor Hill HOA
601. Scott Siker- Resident
602. Steven Siker- Resident
603. Eunice A Sill- Conservationist
604. Megan Silvestri- Resident
605. Jen Simmers- Farmer (horse farm)
606. Joni Siker- Resident
607. Madeline Skinner- Rural Historic Village Resident, historic homeowner and Vineyard owner
608. Stefanie L Smeigh- Resident
609. Eric Smith- Resident
610. Dr. Ernie Smith- Farmer, 25 Year Resident, Preservationist, Rural Business Owner
611. Kathy Smith- Resident
612. Teresa Smith- Resident
613. Roger Smith- Resident
614. Steven A Soechtig- Resident
615. Adair Soho- Farmer, Resident, and Business Owner, Willow
616. David Soho- Another Turn Tack- Small Business
617. David J Soho- Farmer
618. Joseph Solarczyk- Resident
619. Sharon Solarczyk- Resident
620. Catherine Solibakke- Resident
621. Leslie Solitario- Landscape Architect
622. Spencer- Resident
623. Marion Lee Spangler- Resident, Waterford VA
624. Noah Speirs- Horse Show Worker
625. Robert A. Spencer JR- Resident
626. Amanda Sprague- Resident
627. Ryan Sprague- Resident
628. Michael Staton- Resident
629. Cara Stearns- Resident
630. Kathryn Davilli Steele- Resident
631. Katelynn Stern- Visitor
632. Natasha Stith- Resident, Farmer, Environmentalist
633. Thomas Stokes- Resident
634. Camilla Strongin- Resident
635. Emily Stup- Former Loudoun County Resident
636. Luke Stup- Former Loudoun County Resident
637. Eliza Stup- Resident
638. James Michael Stup- Resident (Village of Waterford Citizens) and Preservationist
639. David Michael Sullivan- Resident
640. Mark Sullivan- Resident
641. Neil Sullivan- Resident
642. Mark Sutton- Resident and Property Owner
643. Daniel Szeles- Resident
644. Dorna Taintor- Resident
645. Mavis Taintor- Resident
646. Zebulon Taintor- Farmer, Save Rural Loudoun Foundation



647. Beverly Teague-  
Hamilton Station Road  
Coalition Representative
648. Mr. Tim Teague-  
Resident and Hamilton  
Station Road Coalition
649. Jeremy Tedesco-  
Resident
650. Lisa Tedesco- Resident
651. Kelly Tejada- Resident,  
Preservationist,  
Environmental
652. Mary Terpak-  
Landowner
653. Marsha Thompson-  
Resident
654. Stephanie Thompson-  
Resident of Loudoun
655. Anne Tiller- Resident
656. David Tiller- Resident of  
Waterford, VA
657. Justine Tiller-  
Preservationist
658. Kristen Tiscione-  
Resident
659. Nicholas D. Tiscione-  
Resident
660. Nicholas J.D. Tiscione-  
Resident
661. Sally Tinkle- Resident of  
Canby Road Leesburg,  
VA
662. Michael Titmus-  
Resident
663. Ed Toton- Loudoun  
Resident
664. Trip- Preservationist
665. Grace-Marie Turner-  
Resident
666. Erin Vallario- Resident
667. Caroline Vale-  
Lovettsville Resident
668. Deborah Vandegrift-  
Resident
669. Joey Vazzana- Resident
670. Mary Vegas- Resident
671. Lynne Moore-Vegh
672. Michael Vercillo- Farmer
673. Lynn Wagner- Resident
674. Victoria Wahl- Resident
675. Ian Walker-  
Preservationist
676. Hudson Walker-  
Preservationist
677. Erin Walter- Citizen
678. Michelle Walters-  
Edwards- Resident of  
Loudoun County
679. David Ward- Earthward  
Consulting
680. Glenn Weaver- Resident,  
Homeowner
681. Jeff Weeks-  
Preservationist
682. Miriam Westervelt-  
Resident
683. Kenneth Whetsell-  
Resident
684. Forrest White- Resident
685. Laura White-  
Preservationist
686. Mary Kate White-  
Resident
687. Charlotte Wilcher-  
Resident
688. Robin Wiles- Resident
689. Marianne Willburn-  
Resident
690. Jane Williams-  
Waterford Resident
691. Ted Williams- Resident  
and Avid Gardener
692. Susan Williamson-  
Friend of Resident
693. William E. Wilkin-  
Resident
694. Tom Wilkinson-  
Resident
695. James Wilmans-  
Western Loudoun  
Resident
696. Andrew Wilson-  
Resident
697. J C Wilson- Resident
698. Matthew Wilson-  
Farmer
699. Don Winger- Resident
700. Krista Winger-  
Preservationist
701. Sarah Winn- Resident
702. Andrew Wolfe- Resident
703. Gabriel M. Wolfe-  
Resident
704. Jim Wolfe- Resident
705. Keisha D. Wolfe-  
Resident
706. Susan A. Wolfe- Resident
707. Hannah Wolff- Resident
708. John Wolff- Resident
709. Lisa Wolff- Resident
710. Rachel Womer- Resident
711. Carmel Wood- Resident
712. Christopher Wood-  
Resident
713. Elyssa Wood- Resident
714. Elizabeth Wood- Visitor  
to Loudoun County  
Agricultural Businesses
715. Jodie Wright- Resident
716. Jon Wright- Resident
717. Patricia Wright-  
Resident
718. Patricia L Wright-  
Lovettsville Resident
719. Cate Magennis Wyatt-  
Chair, Waterford 2033
720. Travella Yananuraga-  
Resident
721. Aaron Ye- Resident
722. Heather Yescavage-  
Resident of Loudoun  
County
723. Melissa York- Resident-  
Family has been here for  
generations
724. Elaina Young- Resident,  
Waterford Citizens  
Association member,  
Waterford Foundation  
member
725. Shelley Zafran- Resident
726. Don Zajic- Resident
727. Jonathan Zans- Resident  
of Loco
728. Susan Zimmerman-  
Resident
729. Deborah Zungoli-  
Resident
730. Sarah Zurfluh- Resident
731. Sonya Zurfluh- Loudoun  
County Resident

## **Organizational Impact Statements**

- 2.1 Aldie Heritage Association
- 2.2 Friends of the Blue Ridge Mountains
- 2.3 Hamilton Station Road Coalition
- 2.4 Laurel Hill
- 2.5 Loudoun County Bed and Breakfast Guild
- 2.6 Loudoun County Equine Alliance
- 2.7 Loudoun County Heritage Commission
- 2.8 Loudoun Transmission Alliance - Data Collection Group
- 2.9 Loudoun Transmission Line Alliance – Lovettsville
- 2.10 Loudoun Wildlife Conservancy
- 2.11 Loudoun Wineries and Winegrowers Association
- 2.12 Save Rural Loudoun Foundation
- 2.13 Scenic Loudoun Legal Defense
- 2.14 Waterford Foundation

**Aldie Heritage Association**  
**Organizational Impact Statement**



April 23, 2024

The Aldie Heritage Association (AHA) stands with our preservation and conservation partners in opposition to the proposed NextEra power corridor through rural Loudoun County.

AHA is a 501(c)(3) nonprofit membership organization founded to promote the history, character and heritage of Aldie, Virginia and its surrounding area. Though this specific proposal does not directly impact the Village of Aldie, as one of Loudoun County's rural, historic villages, we are deeply concerned about the potential construction of new transmission lines in rural areas of the County and believe that the best route for new lines is within existing corridors.

Loudoun County's rural landscape is rich in history, agriculture, heritage, natural beauty, and thriving businesses. Many parcels of land are protected by conservation easements, and the tourism draw alone for Loudoun's beautiful countryside is a vital and robust source of revenue for the County. To compromise this landscape and its many assets – natural, historic, and economic – would be a tragic and shortsighted mistake.

Sincerely,

Katie Johnson  
President, Aldie Heritage Association

P. O. Box 20, Aldie, VA 20105 [www.aldieheritage.com](http://www.aldieheritage.com)



## Annex 2.2

### **Friends of the Blue Ridge Mountains Organizational Impact Statement**

#### **1. Contact Person –**

|                                  |                                                       |
|----------------------------------|-------------------------------------------------------|
| Larry Malone, Executive Director | Lowell Smith, Chairman <i>FBRM</i> MARL Working Group |
| LPM.REDC@GMAIL.COM               | patconserve@gmail.com                                 |

0. **Mission**— The mission of *FBRM* is to preserve, enhance and celebrate the Blue Ridge Mountains as a valuable resource and treasured space for present and future generations.

0. **Constituency**— *FBRM* considers its primary service area to be the six counties between Harper's Ferry and the Shenandoah National Park because collectively these counties have large areas of the Blue Ridge Mountains in private ownership. Membership is open to anyone interested in preserving, enhancing, and celebrating the Blue Ridge Mountains.

#### **0. Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization's mission and constituency:**

The Blue Ridge is a remnant of one of Earth's oldest surviving mountain chains. The "preserve and enhance" portion of Friends' mission requires that we remain forever vigilant in protecting our Blue Ridge from all who would exploit it wantonly for corporate greed or private gain.

The Blue Ridge is beloved by many, near and far, for diverse reasons. For residents in Jefferson, Clarke, and Loudoun Counties whose homes are sufficiently close to the portion of the Blue Ridge that would be impacted by the proposed MARL, the Blue Ridge in its changing moods supplies them with emotional security, a sense of well-being in a troubled world, a haven from all the uncertainties in our fast-paced lives.

Reaching farther to include all its innumerable admirers who seek out the Blue Ridge as a place for recreational rejuvenation, or of simple quietude from life's stresses of many causes, the Blue Ridge is a haven that cannot be removed from the routine of our lives. We recreate there in several ways: from the families with toddlers first learning how to walk a trail, to the exuberant young adult eager to run a trail marathon, or the through hiker on the



Appalachian National Scenic Trail (AT) enjoying this mid portion of her 2200-mile adventure from Georgia to Maine.

The AT traverses close to the Blue Ridge ridgeline crossing the right-of-way of the existing FirstEnergy transmission line before descending along Loudoun Heights on its way down to Harpers Ferry. Thousands use this section of the AT over the year, and this number has been rapidly increasing year over year since the beginning of the COVID-19 pandemic.

The Blue Ridge is also home to abundant communities of wildlife for which its forests provide food and shelter. These populations require the protection of the Blue Ridge forested ecosystems to thrive. In addition to its resident wildlife populations the Blue Ridge also serves as a wildlife migration corridor. This function is very important in a rapidly warming world where individual species and entire ecosystems are migrating upslope and from south to north. Additionally, the Blue Ridge is an important component of the Atlantic flyway for migrating hawks and other raptors.

Also, critical to maintaining human wellbeing in the Valley and the Piedmont are the hydrological services provided by the forested slopes of the Blue Ridge. The soils of these undisturbed forests absorb rainfall, slowly releasing it throughout its water table to form springs and intermittent water courses. This process greatly slows erosion, prevents landslides, and maintains flow levels in streams that feed the lowland rivers, as well as maintaining water table levels in the foothills at the base of the Blue Ridge.

The Blue Ridge's forests also moderate our weather extremes. They cleanse our air of air pollutants, some which travel from far away. They are an important carbon sink to help slow the warming of our planet, and they help replenish our oxygen supply.

For all these services, the Blue Ridge is a special place that must be treated with great care when considering a major development that could significantly change its present structure and functioning. We must understand before we act.

It is important to recognize that FirstEnergy's existing 138kV transmission line has been in place for more than 50 years, and that the power it transmits serves a public need. 50 years ago, the Appalachian National Scenic Trail did not enjoy its current level of protection. Indeed, the National Park Service did not own the land along the Blue Ridge traversed by the Trail, nor did it own the corridor lands surrounding the Trail. Friends of Blue Ridge Mountain did not exist, and Sweet Run SP was a farm. All these advances in public access to, and enjoyment of, this portion of the Blue Ridge have occurred since this transmission line was built.

Now, as we become aware of the importance of respecting the several Blue Ridge values we enjoy today, we must work doubly hard to resist future harm, while simultaneously working to enhance the ill effects of harm that occurred in the past.

The natural resources of the Blue Ridge can be considered as a complex of interacting natural systems: geological, hydrological, climatological, several intersecting ecological systems, and

these are intertwined with human economic, cultural, and sociological systems. If we push one of these systems beyond its normal functioning it interacts with other systems to nudge their functioning outside of their normal boundaries. The result is stress for humans and ecosystems alike, perhaps even leading to chaos.

If FirstEnergy proposes simple replacement of the existing 138kV line by a conventionally designed and built 500kV transmission system, underslung with a 138kV line, the potential for great harm to the Blue Ridge's several interacting natural and human systems would result. Construction of industrial scale infrastructure on steep slopes could during both the construction phase and operational phase greatly challenge the capacity to control storm runoff and soil erosion, particularly with ever increasingly intense rainfall events driven by climate change.

The effect of mammoth scale towers dominating the landscape will markedly adversely affect many users of the Appalachian Trail and Sweet Run SP. Not only would there be this dominating visual impact, but the possibility also exists for adverse noise impact as well from the 500kV line. The historic heritage of Sweet Run valley would be overshadowed by looming towers. The apparent pristine nature of the Blue Ridge viewed from a distance would be irreparably marred.

We must assess with deep insight any proposal FirstEnergy makes to fulfill its assigned role under MARL. Moreover, we must be prepared to propose alternative solutions that could substantially reduce the harm to Blue Ridge by a FirstEnergy recommended action. Friends is working to strengthen its capacity to react swiftly and forcefully when FirstEnergy's plans become known.

It is not possible to make a detailed response to this question until FirstEnergy announces its plan for this segment of the proposed MARL. Meanwhile, Friends of Blue Ridge will be working to prepare a strong case for protecting our beloved Blue Ridge Mountain.

**0. Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:**

The Friends of Blue Ridge Mountain's mission is focused on protecting the natural resources and historical patrimony of the Blue Ridge region. We understand LTLA's use of the phrase, "Loudoun County Greenspace" in this question to refer to the segment of the MARL proposed to be built by NextEra across historical districts, farmlands, and agrotourism establishments on western Loudoun's Piedmont, while *FBRM*'s principal focus is on the adverse consequences of FirstEnergy's activities if it would undertake to build its segment of the MARL across the Blue Ridge in very western Loudoun County and eastern Jefferson County.

*FBRM* understands that linkages exist when considering alternative approaches to mitigating impacts from developing new transmission capacity in these two areas. For example, if the proposed alternative to MARL that would replace the cables on existing transmission lines in western Loudoun with Advanced Composite Core Cables were found

to be a desirable solution, it may be possible that the need for First Energy to rebuild its line across the Blue Ridge might no longer be necessary.

Most importantly, we recognize that the residents and citizen protectors of both these subregions share a common interest in protecting their lands' ecological integrity, the socioeconomic viability of its residents, and their quality of life. We gain political strength by standing in mutual support of the interests of each other.

The FirstEnergy segment extends along the existing right of way (ROW) of a 138kV transmission line running from a substation in western Loudoun, westward, crossing SR-671 (Harpers Ferry Rd.), where it crosses Sweet Run SP, running up to the crest of the Blue Ridge. Before reaching the crest, this line crosses one or more parcels owned by the Appalachian Trail Conservancy, and then several parcels owned by the National Park Service that form the corridor lands on both sides of the Appalachian National Scenic Trail. The transmission line then descends the western slope of the Blue Ridge in Jefferson County by generally following the Hwy 9 road corridor, thence crossing the Shenandoah River.

The existing 150-160-foot-wide transmission line ROW has grievously scarred the Blue Ridge. What would be naturally forested land has been replaced with grasslands prone to erosion on its steep slopes. Towers and cables dominate scenic areas in Sweet Run SP, while hikers along the AT have their trail serenity suddenly compromised by this monster construction intruding over the Trail. All this transmission line corridor must be repeatedly manipulated to prevent tree regrowth, creating ecosystem instability, and a stark visual contrast with the adjacent natural areas.

The specifics of the FirstEnergy MARL proposal have not been made public. What is known is that the general plan for the proposed MARL would be to route it over the Blue Ridge on the existing transmission line corridor currently owned and operated by FirstEnergy corporation.

FirstEnergy to date has been silent regarding its plans. This lack of transparency encourages wide speculation by public interest groups concerning what FirstEnergy will need to do to bring MARL over the Blue Ridge, and what the impacts of that might be. Until FirstEnergy is willing to divulge its plans to the public, we must be prepared to assess impacts for MARL Blue Ridge crossings lying outside the bounds of the bland public statements available today.

A more extreme scenario with respect to consequent impacts would be for FirstEnergy to create an entirely new corridor over currently forested lands that cover the flanking slopes and ridgeline of the Blue Ridge. A simple calculation suggests that removal of the forest cover over a 200-foot-wide transmission line corridor might result in the rapid release of thousands of tons of carbon dioxide per mile of removed forest, and the continuing failure of this removed forest to remove another 30 tons of carbon dioxide per mile per year, as well as failing to release 160 tons of oxygen per mile per year. Also impacted would be the hydrological impacts on water storage and release to surface waters as outlined in Question #5. This data is drawn from several sources including: including: the Georgia Transmission

Corporation; the Electrical Engineering Portal; US Forest Service; Arbor Day Foundation; US Environmental Protection Agency; and the Nature Conservancy.

What can be reasonably inferred as a likely scenario is that the existing 138kV line with its towers would be taken down, to be replaced by more monstrous, in width and height, towers capable of handling 500kV cables that are proposed to be underslung with 138kV cables. This would greatly increase the visual impact and possible auditory experience of users of the Appalachian Trail (a linear National Park) and of Sweet Run State Park. The new highly industrialized transmission cables and towers would also intrude on the 19th century historical setting of the Sweet Run valley, thus detracting the visitor further from experiencing what life was like for these early settlers on our land.

An intermediate scenario in impacts experienced could be the technical need for FirstEnergy to widen its existing transmission corridor. Of course, where the consequences of this scenario would lie between these two extremes would depend on the width of additional right of way sought.

In any event, the necessary construction work would require the use of heavy machinery on steep slopes, thus greatly increasing the soil erosion problem. If an increased ROW width were required, serious issues with the Appalachian Trail corridor lands could arise. The 1972 powerline corridor easements are lax in their requirement for the line owner to restore disturbed areas to achieve soil and hydrological stability. Each of these issues must be addressed when FirstEnergy makes its plans public, and solutions found that minimize adverse effects on natural and human resources.

In summary, replacing one, very unfortunately sited, transmission line with another of massive industrial scale on the slopes and summit of the Blue Ridge will result in extensive harm to the users' experience on our park lands, and create additional ecological disturbance and instability on our Mountain. Our historical patrimony would be degraded by this intrusion, as would the quality of life of nearby residents. Further, a precedent would be set for further industrial intrusion on the Blue Ridge. Great caution must be exercised when considering a balance that would optimize the public good if the proposed MARL were to be constructed across the Blue Ridge.

**0. List any research sources that support your projections of the impact on your mission and constituency:** [To be supplied later after FirstEnergy announces an outline for its plans to remove and replace its transmission line over the Blue Ridge.]

**0. Share individual case studies of people, places, or things that will be affected by this project (no more than three):** [To be supplied later after FirstEnergy announces an outline for its plans to remove and replace its transmission line over the Blue Ridge.]

**0. Upload any visuals available that illustrate or support your impact statement.** [To be supplied later after FirstEnergy announces an outline for its plans to remove and replace its transmission line over the Blue Ridge.]

## **Hamilton Station Road Coalition**

### **Organizational Impact Statement**

1. **Contact Person** Dorna Taintor 571-334-5295, [dornataintor@gmail.com](mailto:dornataintor@gmail.com)
2. **Mission** To protect the interest of the residents, farmers, and small businesses, along Hamilton Station Road in Waterford, VA. We will describe the impact of one of the proposed greenfield lines of the Mid-Atlantic Resiliency Project by: describing the impact of building 500 kV transmission lines over, adjacent to or near their property; assessing and quantifying any negative consequences and engaging them in organized opposition to the project.
3. **Constituency** All residents, farms, and businesses located on Hamilton Station Rd, and the side roads from its origin at Clark Gap's road, across Route 9 to about halfway between Route 9 and Route 7. Special emphasis on the parcels that will have the transmission lines across or directly next to them.
4. **Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization's mission and constituency:** The proposed greenfield line travels through the Phillips Farm of Waterford and then travels along the west side of Hamilton Station Road from Clarkes Gap Road until a little under a mile South of Route 9 where it heads off to the southeast. This part of the route is well populated. The route will run through many individual properties, disrupting homes, farms, and farmettes. The several businesses along Hamilton Station include a successful winery, a thriving large farm stand selling local meats, jams, dairy and honey; a restaurant, a pest control business, and several small to large horse farms. All are contributors to the thriving agritourism of Western Loudoun.
5. **Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:** Like much of Western Loudoun County, the area represented by the Hamilton Station Road Coalition is an integrated tapestry of nearly 200 residential, agricultural, and commercial entities. In some cases, the properties encompass all three of these elements - providing income to the residents through agriculture. If any piece of the tapestry is adversely impacted, the ripple effects are felt throughout the entire fabric of the area. The negative impact of the proposed MARL lines will be felt financially, psychologically, and physically across all elements of this area.



- a) Property Devaluation:** Numerous studies show that the presence of overhead power transmission lines results in a devaluation of property values between 5% and 30%, with a direct relationship of the property's proximity to the Right of Way (ROW) and viewshed being a major factor. Our research on the impact of the proposed line on property values in the Hamilton Station Coalition has thus far identified nearly 200 properties that are in or adjacent to the proposed ROW. According to the county tax assessments, the total value of these properties is over \$146M. Applying a conservative estimate of a 15% devaluation of properties results in \$22M devaluation in property value in this area.
- b) Financial Impact to Agritourism:** Loudoun County's tourism industry brings \$2 billion of revenue to the county each year. The lion's share of that revenue is from tourists who come to western Loudoun's wineries, breweries, distilleries, and cideries (\$118 million revenue per year) to escape urban intensity and enjoy "DC's Wine Country" in a relaxing pastoral environment. While those tourists are here, they stay in bed and breakfasts and Airbnbs; they dine in local restaurants; they shop in Loudoun farm markets; and they enjoy the pastoral atmosphere at local wineries/breweries. The portion of the impacted area of Loudoun County represented by the Hamilton Station Coalition represents a portion of the entrance to western Loudoun County that visitors from the dense urban areas of the east will encounter. As visitors crest the hill at westbound Rte. 7 and continue west on Rte. 9, they see a beautiful, welcoming vista all the way to Short Hill Mountain. The pastoral beauty of mountains and farms that enables these tourists to forget the hustle and bustle of the city will be permanently marred for both visitors and residents. The presence of the proposed huge towers supporting 500kV power transmission lines will severely impact the aesthetics of their experience and will certainly deter tourist visits.
- c) Environmental:** The water running through the rivers and streams that traverse this area are a constituent part of the Chesapeake Bay watershed. As a result of being a source for this critical natural resource, the policy makers and residents are obligated to ensure that the Chesapeake Bay watershed standards are upheld. Without careful consideration prior to and during construction of the proposed power lines, there is a potential to adversely impact this vital natural resource which encompasses 6 states, 18M people, and 3600 species of plants and animals. The unique conditions on the Catoctin Creek are needed for many native plant species, important for the environmental health of the area, as well as the wildlife. Damaging the Catoctin Creek would have far-reaching effects.
- d) Impact to Historic Loudoun:** There are numerous properties of historical significance in the area of the Hamilton Station Coalition. These properties date back to pre-revolutionary days, some being built in the early-mid 1700's. The

homes were built with local bricks and stone, as well as lumber that was locally sourced. They have survived the American Revolution and the Civil War and represent the best of American construction and agriculture. George Washington was known to conduct surveys in this area, and likely rested in some of the homes. In one specific area known as the Debutts subdivision, which was established from the original 340 acre farm known as Grassley Farm, a field journal was found which recorded that the Union army torched the barn associated with the original home. The current homeowners are working to restore this barn to its original condition. Grassley Farm can be found on replica maps of the area during the Civil War. In addition to the journal, numerous artifacts of potential historic significance have been found on the Grassley Farm property including a likely shackle that may have been used to restrict movements of enslaved people.

**6. List any research sources that support your projections of the impact on your mission and constituency:**

The Official Military Atlas of the Civil War by Major George B. Davis, U.S. Army; Leslie J Perry, Civilian Expert; and Joseph W. Kirkley, Civilian Expert. Compiled by Capt. Calvin D. Cowles, 23rd US Infantry; 2003 reprint

Maps of Eugene Sheel - Civil War in Loudoun County

James A. Chalmers, PH.D. "Transmission Line Impacts on Rural Property Value" *Right of Way*, May 2013

Delaney C. J. and D. Timmons "High Voltage Power Lines: Do They Affect Residential Property Value?" *Journal of Real Estate Research*, 1992

Hamilton S. W and Schawn G. M. "Do High Voltage Power Lines Affect Property Values?" *Land Economics*, 1995

Des Rosiers, F. "Power Lines, Visual Encumbrance and House Values: A Microspatial Approach To Impact Measurement" *Journal of Real Estate Research*, 2002

**7. Share individual case studies of people, places, or things that will be affected by this project (no more than three):**

**Bel Mont Farm:** Bel Mont Farm is an 80- acre horse farm. The South Fork Catoctin Creek Bel Mont is both home to the Taintor family that owns it and a training facility for show jumpers. The farm was started by the Braden family in the late 1700s. As time went on the home was expanded, adding a brick section to the initial stone home, and building a bank barn. They owned and operated a mill along the South Fork of the Catoctin on the edge of the current property. The house is well preserved with many original floor boards, and beams complete with bark, and windows. Each generation has taken careful care of it. The original family's graveyard is nearby.

The million-dollar training facility has 13 stalls in the main barn and uses the 5 stalls in the historical bank barn as well. It has an outdoor ring and an 80' x 160' indoor ring with synthetic footing. Bel Mont is one of the few facilities in Loudoun training upper level show jumpers. There are 6 turnout paddocks and a large paddock with two run-in sheds for retired horses. With 18 horses in training and 7 retired horses, the farm supports the two owners, two full-time employees and 3 part time employees. The bank barn has an apartment that is frequently rented out when not used by the family. Much of its value comes from its beautiful setting. The Taintors, after purchasing the 30 acres with the farm house and bank barn, purchased the adjoining 50 acres which was once part of the Braden's land. The Braden clan's land once stretched 10 square miles. The 50 acres was previously zoned for houses and was rezoned agriculture and put into land use. This took place, while they also constructed the new barn and arenas, returning the farm to a working farm and protecting the rural nature of Western Loudoun. Annual revenues exceed \$350,000, an increase of 27% over the previous year and projected to grow another 20% in 2024. Bel Mont participates in Loudoun County efforts to protect the Chesapeake Bay Watershed and other environmental initiatives. The farm is part of Loudoun's \$180 million equine industry. It is also a state-approved CEM quarantine facility for horses that are imported from other countries. The current facilities were built by a local contractor who has returned over the years for smaller projects and repairs. The farm relies on local vendors for grain, hay, equipment and repairs; and the horses need care from veterinarians and farriers. Almost all of the horses have owners other than the Taintors. These owners, 42% of which live outside Loudoun County, help keep western Loudoun thriving, by frequenting the many wineries, farmstands, shops and restaurants of the area.

The proposed line will run through this farm. With the slope of the land, the south fork of the Catoctin, with two estuaries, and the several buildings and rings constraining space, Bel Mont will be damaged greatly by the transmission lines and their towers. Losing the use of any portion of the property or buildings will make it difficult or impossible to continue training. After many years of investing in the facilities it would be impossible for the Taintors to resume work at a new location at the same level. Sport horses are reactive, fearful and sensitive, and would be difficult, or impossible to house and train near high-voltage wires. The historical nature of the farm would also be severely damaged and the beauty and calm that drew many of the horse owners to it, gone.

**Contact Person** Dorna Taintor 571-334-5295, dornataintor@gmail.com

### **The Barns at Hamilton Station Vineyards**

The Barns at Hamilton Station Vineyards, a cherished heritage of Loudoun County's agricultural legacy, stands as a testament to resilience and reinvention. Once a sprawling 100- acre dairy farm, tended by generations of the esteemed Warner family, it has transformed into a thriving winery and vineyard under the stewardship of the Fialdini family. Nestled in the heart of historic Hamilton, Virginia, this haven of rustic elegance beckons visitors from near and far.

With roots tracing back to 1910, the property exudes a timeless charm, boasting a farmhouse steeped in history and a meticulously restored stone and wood bank barn,

now a captivating tasting room and premier event venue. Here, amidst rolling vineyards and pastoral tranquility, dreams are realized, and memories are made.

However, looming on the horizon is the ominous threat of the proposed NextEra Greenfield transmission line—a 500kV behemoth that threatens to mar the very essence of this idyllic sanctuary. The proposed route, cutting through the heart of our vineyards and looming at our property’s edge, presents an existential crisis. Its presence would shatter the serene vistas, casting a shadow of uncertainty over our livelihoods.

For The Barns at Hamilton Station Vineyards, this is not merely a matter of aesthetics; it is a matter of survival. Our business thrives on the delicate balance of agricultural innovation and hospitality. We produce exquisite award-winning wines, nurtured from our own estate-grown grapes, while providing a picturesque backdrop for destination wine tastings, weddings, corporate gatherings, and agritourism experiences.

The economic repercussions of this intrusion would be catastrophic. It threatens to unravel the very fabric of our existence, undermining years of hard work and dedication. It would disrupt the livelihoods of our employees, the local businesses that rely on our patronage, and the broader community that benefits from our contributions to economic development and rural culture. The prospect of towering transmission towers marring our landscape strikes at the core of our identity, jeopardizing not only our business but the rich tapestry of rural culture that defines western Loudoun.

As we stand on the precipice of uncertainty, we implore those entrusted with our community’s future to consider the irreplaceable value of places like The Barns at Hamilton Station Vineyards. Our patrons, prospective brides and grooms, and the countless visitors who find solace in our vineyards, deserve better. Let us preserve not only a business but a way of life—a legacy that generations past have entrusted to our care.

**Contact Person:** Maryann Fialdini; [maryann@thebarnsathamiltonstation.com](mailto:maryann@thebarnsathamiltonstation.com)

### **The Debutts Subdivision**

The Debutts Subdivision comprises 25 residential properties zoned AR-1. The homes exemplify the properties in the Hamilton Station coalition area in that they range from a historically significant home built in the 1730’s to a custom built 21st century manor house which property includes outbuildings of historic significance.

The original property known as Grassley Farm is considered to be one of the 10 oldest homes in the Waterford area. This 24 acre private equestrian property encompasses the original field-stone constructed farm house with an 1800’s brick “wing”; an original field stone spring house; and brick smokehouse, all located on magnificent rolling Western Loudoun County countryside with a pastoral view to Short Hill Mountain. The brick portion of the home and the smoke house are constructed in a classic Flemish Bond style demonstrating the high level of both skill and artistry of the original early American settlers. This Early American architectural masterpiece has been lovingly restored and preserved by its current owners of more than 20 years. The farm has been augmented

by an Amish built gambrel style barn and indoor riding arena for dressage. The pastures are home to 5 equine athletes specializing in dressage and trail riding.

The newest home in the Debutts Subdivision was built in 2017 and was modeled after the current owners' family home in Fairfax County. This property was purchased over 20 years ago due to the owners' recognition of the unique beauty of this area. This home was intentionally built to enable the residents to enjoy the pastoral views from all 169 of the windows. While the home is new, this property also contains a variety of outbuildings of historic significance. One of these is the original stone barn that was a critical part of the livelihood of the original land owner from the 1700s, and which was subsequently burnt down by the Union Army during the Civil War. The current home owner is working to restore this barn using stone from the area. A second outbuilding of historic significance is a 1950's vintage dairy barn which now has a genteel appearance through the addition of a fine stone masonry facade and matching bridge over a stream. This property owner worked with the Army Corps of Engineers to design a 2-acre stocked pond and has planted over 200 trees eighteen years in advance to continue to amplify the natural beauty with mature trees. The water flowing north through both of these properties is part of the Chesapeake Bay watershed with the resultant legal obligation to ensure that C.B. standards are upheld.

While the proposed power lines will adversely impact the viewshed and therefore the property values for these properties, these residents will also be impacted in other ways. First, the quality of life and mental tranquility of the residents will be adversely impacted due to the destruction of the view from the properties. Second, based on first-hand experience of the equestrians who operate the historic Grassley Farm, they will no longer feel safe trail riding in the region of the power lines due to the increased reactivity of the horses resulting from the electromagnetic fields and audible popping and hissing from the lines. Third, the destruction of the environment due to the construction of the proposed lines will likely result in the loss of historically relevant artifacts in this area. And fourth, this construction could potentially compromise the integrity of the waters flowing into the Chesapeake Bay watershed.

Also worth mentioning is the dozens of small farmers living on the former DeButts land and adjacent to it. These farmers raise chickens (for eggs and meat), goats, sheep, and cattle; many own a horse or two (which they ride in the surrounding horse-friendly areas), maybe even a donkey. There are numerous beekeepers. The farmers grow hay for the livestock; raise vegetables and fruit; sell high-quality farm-fresh dairy products; sell small-batch lamb sausage; spin wool from the sheep and create woolen goods to sell; harvest fruit from heritage trees and bushes to make/preserve jams and fruit butters, etc. These small farmers have no champion. They are a valuable asset to our community, a link to our history. They deserve recognition that their way of life (and livelihood) will wither and die if these high-voltage power lines destroy the only environment they've ever known.

**Contact person:** Carmel Woods [ecarmel.grassley@gmail.com](mailto:ecarmel.grassley@gmail.com)



**Visuals that illustrate impact statement:**



Native Bluebells and Sycamore along the South Fork Catoctin in floodplain



The training facility at Bel Mont Farm





The farmhouse



A Vineyard

The Barns





The Barns, facing the proposed route



Native Birds



Farm Animals



Scenes from Hamilton Station Rd. Landscape looking over proposed route.

## Laurel Hill

### Organizational Impact Statement

1. **Name of Organization** - Laurel Hill, 16191 Hamilton Station Rd, Waterford VA. Land Trust of Virginia.
2. **Contact Person** - Patrick Blaszc 703-362-2781 pblaszc@blaszcslaw.com, Kathleen Funk 703-362-2780, Christopher Blaszc 703-303-9458
3. **Mission** - To preserve the historic buildings and open spaces and to provide respite in the form of a 1762 historic home and working farm tucked back off the road and mimicking the look of the 1700-early 1900's to clientele visiting the area
4. **Constituency** - People visiting the area for agrotourism, weddings and generally those wishing a respite from their busy lives
5. **Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization's mission and constituency:**
  - a. Similar to historic Waterford Village, the proposed pathway of the transmission lines passes through our easement-protected farm, Laurel Hill. The towers and lines, along with the cleared area required for their installation, would forever destroy the view shed and its current proposed path would destroy old trees overlooking a creek and likely would forever disturb 3 natural surface springs and seeps that drain into the creek, one of which arises at the base of a large oak tree, and a nascent pond, all of which are crucial to the tucked-away feeling that this property provides from modern traffic. We are located a short distance away from the Waterford National Historic Landmark.
6. **Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:**
  - a. **Financial Impact:** Visitors are less likely to choose to come to Laurel Hill when the view shed does not reflect the 18<sup>th</sup> and 19<sup>th</sup> century historic period and a powerline through our 'front yard' will definitely impact the experience.



If visitors choose not to come here, the AIRBNB/VRBO side of the business will fail, all of which is needed in order to support the costs of the working farm.

- b. **Blow to Preservation Efforts:** Should the Land Trust of Virginia conservancy easement on the affected property through which the transmission line pathway traverses not remain in force, the future of preservation easements throughout Virginia will be at high risk just as current easements through the VOF and other entities would no longer offer concrete protections against utility and other infrastructure projects. We have invested time and funds to develop the property for conservancy and agriculture, all of which would be lost and diminish our farm's value. Future plans to encourage native plants and habitat around fence lines and creek and warm weather native grasses would be pointless. Powerlines in green areas will result in increased development, pollution, and the loss of historic sites that can never be replaced.
7. **List any research sources that support your projections of the impact on your mission and constituency** - Laurel Hill is currently in a Land Trust of Virginia easement. A powerline through the property would destroy the meaning of the easement.
8. **Share individual case studies of people, places, or things that will be affected by this project (no more than three):**

Laurel Hill has on its property at least 3 natural springs (one at the base of an oak tree with the date 1811 on the spring wall, another date on the springhouse is illegible but the initials JM [Myers, either Jacob, Joseph or Jonathon] are etched into stone), a creek emptying into Catoctin Creek, the largest American ash tree in Loudoun County off the home's kitchen, and on the bordering Moore property on which we raise hay, resides a very large and old white oak tree, the latter along the running/walking trail groomed to be part of the offering to Laurel Hill patrons.

The construction efforts would disturb natural wildlife inclusive of a pair of nesting Cooper's hawks in the proposed path and definitely upset the Angus cattle as the proposed line would bisect their grazing fields.

Additionally, the home dates from circa 1762 and the stone barn from 1824. The silo, admittedly in disrepair due to a fire, is the surviving example of poured concrete construction from early in the 1900's in Loudoun County. The property, now on its 5<sup>th</sup> owner, was held for nearly 200 years by the Quaker Myers family, given to them by William Fairfax, brother to Lord Fairfax, who was instrumental in settling much of Virginia. It is a complimentary historical property to the development and maintenance of nearby historic Waterford Village.

9. **Upload any visuals available that illustrate or support your impact statement.**

**The Loudoun County Bed and Breakfast Guild**  
**Organizational Impact Statement**

**P.O. Box 253, Purcellville, VA 20134**

**Friday, April 5, 2024**

**Subject: Loudoun Transmission Line Alliance Declaration**

The Executive Committee of the Loudoun County Bed & Breakfast Guild has a quorum vote in agreement to support the declaration made by the Loudoun transmission Line Alliance regarding the Nextera MARL Proposal. We stand in solidarity with fellow stakeholders representing various sectors in Loudoun County, Virginia, urging NextEra Energy to reconsider the construction of new power corridors through our rural communities.

The negative impact of such construction on our rural businesses, agricultural community, local economy, heritage, residents, and visitors cannot be overstated. We strongly oppose the implementation of new "greenfield" lines in rural areas and advocate for the utilization of existing power corridors for any necessary transmission line projects and alternative methods to minimize disruption to our landscapes and communities.

Loudoun County is a thriving tourism destination and agricultural region, boasting significant economic contributions from agritourism and our historic sites. Preserving our landscapes, unique lodging properties, farms, wineries, breweries, and historic landmarks is essential to maintaining the vitality of our economy and cultural heritage.

We emphasize the importance of protecting our historic and environmental sites, including National Historic Landmarks, historic districts, and properties under conservation or preservation easements. Any plan that disregards these protections undermines the integrity of our community and heritage.

In light of the significant implications for Loudoun County's economy, environment, and cultural heritage, we urge NextEra Energy to reconsider its plans and refrain from constructing new power corridors in our rural landscapes. This is not just a commercial decision; it's an existential issue for our community.

We join our voices with the Loudoun Transmission Line Alliance in calling for preserving our rural landscapes and the well-being of our community.

Sincerely,

Cheri Shields  
President, Loudoun County Bed & Breakfast Guild

## 2024 Guild Executive Team

### Board of Directors

Cheri Shields, President (Hidden View Bed &Breaktast)

Leslie Tharp, Last President (Former Owner Stone Gables Bed &Breaktast)

Chris Suarez, Vice President of Properties (Bear Chase Manor)

DavidWeinschel, Vice President of Partners (Bluemont Station Brewery &Winery)

Prashant Shah, Treasurer (Stone Manor Boutique Inn)

Reagan Walker, secretary (Watertord Reservations)

### Board of Advisors

Ellen Goldberg, PastPresident (BriarPatch Bed &Breakfast)

Alta Jones, Past Chair (Altalerra Farm)

HillaryColey, Past Chair (Dominion Tea)

### Committee Chairs

Lisa Peterson, Membership (Airwell Bed & Breakfast)

Manisha Shah, Partnership (StoneM a n o r Boutique Inn)

Moises Cardenas, Marketing (SC Marketing)

Donnie Walker, Legislation (Waterford Reservations)

Angela Rabena, Education (bloomszu)

## Loudoun County Equine Alliance (LCEA)

### Organizational Impact Statement

1. **Contact Person:** Kelly Foltman, DVM, President
2. **Mission:** The mission of the Loudoun County Equine Alliance is to present a unified voice to actively advocate, educate and communicate the goals, initiatives and benefits of the horse industry, in order to advance the interests of all equine disciplines and the entire equestrian related industry.
3. **Constituency:** Loudoun County and surrounding county equestrians and enthusiasts.
4. **Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization's mission and constituency:**

Most of Loudoun's horse industry lies in the rural west. According to the most recent survey of the horse industry in Loudoun performed in 2013 by the Weldon Cooper Center at the University of Virginia, the County is home to over 14,000 horses. The total economic impact of the horse industry in Loudoun was calculated to be \$180 million annually (not including property tax revenues). The study also concluded that the horse industry creates over 2,700 jobs in the County and draws approximately 78,000 spectators to equestrian events a year, with one third coming from out of state.

Loudoun's equestrian stables are mostly on parcels smaller than 40 acres, especially in the northern sections of the county where lot density is highest. According to the 2013 survey, the most common horse property size is 10-19 acres. Any transmission line across properties of this size would encumber most of the property from equestrian use.

The most recent U.S. Agricultural Census has Loudoun County ranked number two in the state after Fauquier County for the number of equine FARMS, another indicator of the strength of the horse community in Loudoun. To be listed as a farm in the census, the stable must generate an income of at least \$1,000 annually. However, in Loudoun, most properties are private and not directly generating revenue, so the actual number of horse farms in the county is underestimated in this national survey.

Loudoun is home to an exceptionally high number of Olympic-caliber equestrians and professionals who make their living boarding, training and showing horses. The value of the top-level competition horses can easily be \$100,000 or more. No owner of competition horses would want their horse trained in an area in proximity of a transmission line and no owner would be comfortable allowing access for



transmission maintenance to a pasture containing their valuable horse. Maintenance via helicopter could be equally problematic.

Given the choice between two equal training or boarding barns (feed, stall and turnout only), one at a property with a transmission line near pasture, barns and arenas and one without, a client paying the average training board of \$2000 or more monthly or boarding fee of \$800-\$1200 monthly would seek the facility without the transmission line. Even with those prices, profit margins are thin. Reducing prices would be economically disastrous.

In 2019, the Loudoun County Board of Supervisors unanimously approved a master plan for development of a county-wide linear parks and multi-modal trail system. This plan envisions use of trails throughout western Loudoun by equestrians. Creating this system of interconnected trails has begun and any disruption of its development by the building of a transmission line would subvert a highly popular and economically valuable initiative.

Trails along transmission line corridors are not desirable as they lack shade and most riders find the hum of the wires and the overall environment around the towers antithetical to the type of experience they are seeking when trail riding. In the 2013 survey, 63% of respondents cited trail riding as an activity they enjoy – even Olympic riders on top competition horses trail ride!

Unpaved roads are also important for equestrians. The effort to preserve western Loudoun's unpaved road network includes having it placed on the National Register of Historic Places – the application is currently under review by the National Park Service. Disruption of this historic and recreational asset (it is highly valued by cyclists as well and gravel cycling events draw thousands of participants to Loudoun) would be a detriment to the County.

**6. Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:**

The financial impact to boarding and training farms could be insurmountable to those businesses for the reasons discussed above. Furthermore, most wealth for horse farm owners is in their property, which would be negatively impacted by a transmission line on property or within the viewshed.

Loudoun County has long been branded “horse country” and the equestrian community works hard to ensure that a strong equine industry can thrive here. Transmission lines crossing horse properties are a threat not only to those property owners but to the health of the entire industry. Equestrians are vital stewards of rural land – once they begin to pack up and leave, a cascade of other economic impacts will be felt across traditional agriculture, agritourism and direct horse care enterprises such as farriers, veterinarians, feed and tack stores.

**7. List any research sources that support your projections of the impact on your mission and constituency:**

**Loudoun County Equine Alliance ([loudounequine.org](http://loudounequine.org))**

**[https://loudounequine.org/wp-content/uploads/2016/04/Loudoun-County-Equine-Surveys-Report-of-Results.FINAL\\_.pdf](https://loudounequine.org/wp-content/uploads/2016/04/Loudoun-County-Equine-Surveys-Report-of-Results.FINAL_.pdf)**

**Census of Agriculture - 2022 Census Publications - State and County Profiles - Virginia ([usda.gov](http://usda.gov))**

**Here's Where the Wealthiest U.S. County \*Actually\* Is ([fodors.com](http://fodors.com))**

## Loudoun County Heritage Commission Organizational Impact Statement



Loudoun County, Virginia  
Heritage Commission

1 Harrison Street, S.E., P.O. Box 7000 Leesburg, Virginia 20177-7000

Telephone (703) 777-0246 ☐ Fax (703) 777-0441 ☐ E-mail: loudounhc@loudoun.gov

March 17, 2024

Phyllis J. Randall, Chair  
Loudoun County Board of Supervisors  
1 Harrison St., S.E.  
Leesburg, VA 20175

### NextEra Power Corridor

Dear Chair Randall and Members of the Board of Supervisors,

The mandate of the Heritage Commission is *“to support and protect Loudoun’s Heritage Resources,”* which are its *“valued natural, cultural, and historic locations, site, and objects ... that have been passed down from previous generations.”*

As members of the Board know, NextEra’s proposal to build transmission lines through western Loudoun has elicited strong public reaction. Although the final route remains undecided, NextEra’s application to PJM -- the authority that governs the regional grid -- indicates that it is contemplating a “greenfield” power corridor that would cut through miles of Loudoun’s rural areas, much of it protected by conservation and historic preservation easements such as the Waterford National Historic Landmark.

In fact, any new power corridor in rural areas, wherever it is located, would endanger Loudoun’s rich agricultural, natural and heritage resources, which aside from their aesthetic value contribute mightily to the local economy. And yet nowhere in its application to PJM did NextEra take into account the potential damage to everything from wineries and farms to BNBs and the equine industry, which together generate hundreds of millions of dollars in economic output.

Of particular concern to the Heritage Commission are the impact of NextEra’s towering transmission lines and substations on historic and environmental sites, including the landscapes that distinguish our beautiful County. In no instance, we believe, should power corridors transit through or near Loudoun’s six National Historic Landmarks, its seven

historic districts, and the 4,426 properties under conservation or preservation easements. At risk are prime farmland, waterways, habitats, open spaces, and centuries-old farmsteads, as well as designated heritage areas such as the Journey Through Hallowed Ground National Heritage Area, Appalachian Trail, and Potomac Heritage Trail.

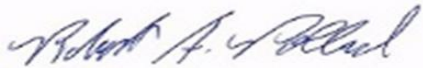
Alarmed over this development, some two dozen preservation and community organizations convened in February to form the **Loudoun Transmission Line Alliance**. The attached **Declaration**, signed by 15 groups to date (with more to come), urges NextEra to avoid construction of new greenfield power lines, and to follow existing corridors instead.

Given its profound concern over the threat to our County's historic and natural resources, **the Heritage Commission voted unanimously on March 4 to support the Declaration.**

Much work lies ahead before the NextEra proposal goes before the State Corporation Commission, presumably in the fall. In the meantime, the preservation and conservation community will continue to press for a solution that protects our County's precious heritage resources. We strongly encourage the Board of Supervisors to lend your support to that effort.

Thank you for your kind consideration.

Sincerely,



Robert Pollard  
Chairman, Loudoun County Heritage Commission

cc: Tim Hemstreet, County Administrator  
Joe Kroboth, Assistant County Administrator  
Dan Galindo, Director, Planning and Zoning  
Loudoun County Heritage Commission

## Loudoun Transmission Line Alliance (Data Collection Group)

### Organizational Impact Statement

1. **Contact Person:** Clyde Housel
2. **Mission:** To **IDENTIFY** the residents of Loudoun County who are most affected by the proposed Greenfield Link of the Mid-Atlantic Resiliency Project, and to **COLLECT and COMPILE** impact data to support opposition to the approval of the Greenfield Link.
3. **Constituency:** Loudoun County residents with emphasis on Western Loudoun
4. **Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization's mission and constituency:** The new 500kv Greenfield Link, as proposed, extends from the foot of Short Hill Mountain at the end of Longlane for 22 miles to the new proposed Aspen substation south-east of Leesburg. The proposed route cuts through the heart of western Loudoun prime farmlands and vineyards (nationally recognized Middleburg American Viticultural Area) requiring a right of way (ROW) that will bisect farms and vineyards as well as numerous rural residential properties.
5. **Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:** If the Greenfield Link is approved as proposed it will result in serious financial impacts to county residents.
  - a. **Property devaluation:** Numerous studies show that the presence of overhead power transmission lines results in a devaluation of property values between 5% and 30%, with a direct relationship of the property's proximity to the ROW and viewshed being a major factor. *INSERT SUMMARY OF CASE STUDY HERE*
  - b. **Financial Impact to Agritourism:** Loudoun's tourism industry brings \$2 billion of revenue to the county each year. The lion's share of that revenue is from tourists that come to Western Loudoun's wineries, breweries, distilleries, and cideries (\$118 million revenue per year) to escape urban areas and enjoy "DC's Wine Country" in a relaxing pastoral environment. While those tourists are here they stay in local bed and breakfasts, air B&Bs, hotels and motels. They dine in local restaurants and visit Loudoun farm markets. They flock to local towns for Oktoberfest, Christmas Markets, and other holiday events. The presence of huge towers supporting 500kv power transmission lines will severely impact the aesthetics of their experience and will certainly deter tourist visits. *INSERT SUMMARY OF CASE STUDYS HERE*



**c. Impact to Farming Operations:** Most of Western Loudoun County is zoned for Agricultural use (AR1). This zoning, supported by **Soils Classification**<sup>1</sup> and a long-standing conscious effort to preserve and foster farming in that part of the county. Loudoun County government, supported by Virginia Code acknowledges **“Important Farmlands”**<sup>2</sup> and has designated **“Agricultural Districts”**<sup>3</sup> and promotes agricultural land use through tax incentives. Farming practices have evolved from a smaller number of large family farms to many smaller farmettes involved in a “farm to table” marketing approach, on site self-service markets, and leasing for hay production. If approved as proposed the Greenfield Link will severely disrupt these farm practices by imposing right of ways through farms and farmettes, thereby reducing or eliminating farmable areas and discouraging on site sales of farm products.

**d. Impact to Civic Non-Profit Organizations:** *Show impact to Therapeutic Riding Center, parks, etc..*

**6. List any research sources that support your projections of the impact on your mission and constituency:**

**References for Property Devaluation Estimates:** Note: Studies show a wide range of devaluation impacts based upon the types of real estate considered:

1. Urban areas with power transmission lines tend to show little or no devaluation in property values
  2. Rural areas with power transmission lines show from 5 to 36% devaluation in property values
  3. High end properties with power transmission lines show a greater devaluation in property values
  4. Property devaluation is less with increasing distance from the ROW and viewshed
- Thomas O. Jackson, and Jennifer Pitts “The Effects of Electric Transmission Lines on Property Values: A Literature Review” *Journal of Real Estate Literature*, January 2010
- James A. Chalmers, PH.D. “Transmission Line Impacts on Rural Property Value” *Right of Way*, May 2013
- Delaney C. J. and D. Timmons “High Voltage Power Lines: Do They Affect Residential Property Value?” *Journal of Real Estate Research*, 1992
- Hamilton S. W and Schawn G. M. “Do High Voltage Power Lines Affect Property Values?” *Land Economics*, 1995
- Des Rosiers F. “Power Lines, Visual Encumbrance and House Values: A Microspatial Approach To Impact Measurement” *Journal of Real Estate Research*, 2002

**References For Impact to Farming Operations:**

- <sup>1</sup> Soils Classification : Website “loudoun.gov” County Soil Types
- <sup>2</sup> Important Farmlands : Commonwealth of Virginia State Corporation Commission Division of Public Utility Regulation “Guidelines for Transmission Line Applications Filed Under Title 56 of the Code of Virginia, Section III, paragraph F. 1 and 2.”
- <sup>3</sup> Zoning Ordinance **Agricultural Districts** “It is hereby declared to be the policy of the County of Loudoun to conserve, protect and to encourage the development and

improvement of its agricultural and forestal lands for the production of food and other agricultural and forestal products. It is also the policy of the County of Loudoun to conserve and protect agricultural and forestal lands as valued natural and ecological resources which provide essential open spaces for clean air sheds, as well for aesthetic purposes. It is the purpose of this Ordinance to provide a means by which agricultural and forestal land may be protected and enhanced as a viable segment of the County's economy and as an economic and environmental resource of major importance, pursuant to Title 15.2, Chapter 43 of the Code of Virginia (1950), as amended."

- 7. Share individual case studies of people, places, or things that will be affected by this project (no more than three):** *INSERT FARM CASE STUDY (Possible Aramac Farm- horse feed/bedding), (Possible Therapeutic Riding-aesthetic/psychological Impact)*
- 8. Upload any visuals available that illustrate or support your impact statement:**
  - a. Greenfield ROW Property Devaluation Study (*Prototype Attachment A*)
  - b. Greenfield Adjacent to ROW Property Devaluation Study
  - c. Agritourism Study
  - d. Farm Products Loss Study. *This will eventually include the entire analyses spreadsheets.*

## Loudoun Transmission Line Alliance: Lovettsville

### Organizational Impact Statement

1. **Contact Person:** Mary Terpak: [MLTerpak@earthlink.net](mailto:MLTerpak@earthlink.net)
2. **Mission:** Identify the property owners in the Lovettsville area who will be affected by the proposed “Greenfield Line” of the Mid-Atlantic Resiliency Project in order to: 1) describe the impact of the transmission lines over, adjacent to or near their property; 2) to assess and quantify any negative consequences for their economic well-being and personal lifestyle; and 3) engage them in organized opposition to the project.
3. **Constituency:** All residents of the Lovettsville area and particular property owners who live, farm or engage in any business activities on land affected by the transmission line path in the Lovettsville area.
4. **Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization’s mission and constituency:** The Greenfield Line enters the Lovettsville area at the top of Short Hill Mountain near the end of Long Lane and continues for 4.5 miles to Ash George Road, where it crosses into Waterford. Lovettsville and its surrounding neighborhoods are a quintessential rural Virginia community that is known and loved for its beautiful views, prime agricultural land, and miles of county dirt roads that reinforce the county’s rural image and culture. The proposed route cuts through the heart of western Loudoun’s highly productive agricultural land requiring a right of way (ROW) that will bisect farms as well as numerous rural properties and residential neighborhoods.

Building the line through the rural community of Lovettsville will result in the loss of viable farm land under, around or adjacent to the towers; a reduction of residents’ property values due to visible intrusion of the towers and potential buyer resistance; loss of enjoyment of the natural beauty of the environment by residents, tourists, and customers; and the destruction of wetlands, trees, habitat, and native fauna and flora.

5. **Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:** The impact of the proposed line on the economic health and well-being of the Lovettsville community is significant. The line will be built on or adjacent to neighborhoods impacting approximately 82 property owners by decreasing property values and disrupting the quality of life currently enjoyed and highly valued by these residents. In addition, the line will cross through or by dozens of small farms, equestrian facilities and businesses on private property impacting the economic viability of individual landowners and the Town. The line will also cross over Milltown Creek, an important wetland and vital

tributary of the protected Catoclin Creek, thus threatening the ecology and biodiversity of the county's primary waterways.

**a. Property devaluation:** Numerous studies show that the presence of overhead power transmission lines results in a devaluation of property values between 5% and 30%, with a direct relationship of the property's proximity to the Right of Way and viewshed being a major factor. Our research on the impact of the line on property values in Lovettsville has thus far identified 82 properties, that are in or adjacent to proposed ROW. According to the county tax assessments, the total value of these properties is \$71,580,530. Applying a conservative estimate of a 15% devaluation of properties in the ROW and a 5% impact of adjacent properties, results in \$10,737,080 million devaluation in private property in the 4.5 mile of the transmission line in Lovettsville

**b. Financial Impact to Agritourism:** Loudoun County's tourism industry brings \$2 billion of revenue to the county each year. The lion's share of that revenue is from tourists who come to western Loudoun's wineries, breweries, distilleries, and cideries (\$118 million revenue per year) to escape urban intensity and enjoy "DC's Wine Country" in a relaxing pastoral environment. While those tourists are here, they stay in bed and breakfasts and Air B&Bs in Lovettsville and elsewhere. They dine in local restaurants and visit Loudoun farm markets and one or more of Lovettsville's three wineries and breweries. They flock to Lovettsville for craft festivals, farm tours, Oktoberfest, Christmas Markets, Mayfest, and other local holiday events. The presence of huge towers supporting 500kv power transmission lines will severely impact the aesthetics of their experience and will certainly deter tourist visits.

**c. Impact to Farming Operations:** The Lovettsville area is zoned for Agricultural use (AR1). This zoning reflects the reality of farming as the prevailing historic occupation and a long-standing conscious effort to preserve the land and foster continued agricultural uses, and is supported by Soils Classification<sup>1</sup> as prime agricultural land. The County government, pursuant to Virginia Code acknowledges "Important Farmlands"<sup>2</sup> and has established "Agricultural Districts"<sup>3</sup> and promotes agricultural land use through tax incentives. A very large farming operation in the pathway of the transmission line is home to the largest hay production and sales business in the county, serving livestock owners here and throughout the county and surrounding jurisdictions. Farming practices in the area have evolved from a smaller number of large family farms to many smaller farmettes involved in a "farm to table" marketing approach, on-site self-service markets, equestrian facilities, wine grape cultivation, and leasing for hay production. If approved as proposed, the Greenfield Line will severely disrupt these farm practices by imposing ROWs through farms and farmettes, thereby reducing or eliminating farmable areas and discouraging on site sales of farm products.

Lovettsville has a thriving equestrian presence in the form of boarding, training, and instruction businesses and private horse farms. Approximately 22 horse farms and activities are threatened by being directly in the path of the line, and equestrians in

general cherish the ability to ride undisturbed in our fields and on our tranquil dirt roads, several of which will be crossed by the towers and lines. In many instances, equestrian uses are on parcels of 10-20 acres which would be drastically curtailed by the presence of towers and lines, and in most cases the operators use every inch of their land for pasture and riding. These horse farms and activities contribute substantially to the prosperity of western Loudoun. Not insignificantly, equestrians are very anxious about the health implications for themselves, their horses and their customers of the transmission lines.

Research of the county tax records shows that sections of the 4.5-mile transmission line in Lovettsville will be built on or adjacent to approximately 28 properties in land use. The line will have many direct impacts on the local agribusiness's operations. For example, installation of transmission towers may require land clearance, potentially disrupting farming operations, such as field crops, greenhouses, or livestock grazing areas. The construction activities could cause damage to existing farm infrastructure, such as irrigation systems, buildings, or equipment and will restrict access to certain areas of the farm, disrupting farming activities such as planting, harvesting, or transportation. The transmission lines will generate electromagnetic fields, potentially interfering with electronic equipment used in farming operations, such as irrigation controllers, refrigeration systems, or processing machinery. The ongoing presence of transmission towers could lead to crop or livestock losses due to damage or reduced productivity leading to revenue losses for individual businesses and the farming section in the area.

**d. Impact to Historic Lovettsville:** Settled primarily by German immigrants in the early 18<sup>th</sup> century, Lovettsville was known then, as now, as the German Settlement. Lovettsville was established as a Town in 1836. During the Civil War Lovettsville was an important stop for Union troops crossing the Potomac River and served as a crossing point for the Underground Railroad.

The proposed 500Kv transmission corridor crosses Short Hill Mountain, which marks the western boundary of the Lovettsville geographic area. At the foot of the mountain lie productive farms, old farmhouses and buildings, old churches and other sites of historic interest.

Mount Sinai African Methodist Episcopal Church was located at the intersection of Britain and Mountain Roads at the foot of Short Hill Mountain. The church is gone but the accompanying cemetery is still there, with the earliest graves dating to 1877. Many other churches in the area served local neighborhood congregations which reached them in the early days by horse and buggy from surrounding farms and which are still vibrant places of worship.

George's Mill Farm is a significant historic property within the sight lines of the proposed transmission corridor. Since 1750, the property has been in the hands of the



George family and their descendants and hosts a thriving agricultural business focusing on goats, cheese and agritourism.

The integrity of these sites, along with many others up and down the proposed path are threatened by this project and its collateral consequences. The history and agricultural and tourism businesses in Lovettsville are a huge contributing factor to the economy of western Loudoun. Once these properties are compromised or destroyed, there will be no way to recoup the financial losses or repair the damage done.

**7. List any research sources that support your projections of the impact on your mission and constituency:**

**References for Property Devaluation Estimates:** Note: Studies show a wide range of devaluation impacts based upon the types of real estate considered:

1. Urban areas with power transmission lines tend to show little or no devaluation in property values
2. Rural areas with power transmission lines show from 5 to 36% devaluation in property values
3. High end properties with power transmission lines show a greater devaluation in property values
4. Property devaluation is less with increasing distance from the ROW and viewshed

**References For Impact to Farming Operations:**

<sup>1</sup> Soils Classification : Website "loudoun.gov" County Soil Types

<sup>2</sup> Important Farmlands : Commonwealth of Virginia State Corporation Commission Division of Public Utility Regulation "Guidelines for Transmission Line Applications Filed Under Title 56 of the Code of Virginia, Section III, paragraph F. 1 and 2."

<sup>3</sup> Zoning Ordinance **Agricultural Districts** "It is hereby declared to be the policy of the County of Loudoun to conserve, protect and to encourage the development and improvement of its agricultural and forestal lands for the production of food and other agricultural and forestal products. It is also the policy of the County of Loudoun to conserve and protect agricultural and forestal lands as valued natural and ecological resources which provide essential open spaces

**Other References**

James A. Chalmers, PH.D. "Transmission Line Impacts on Rural Property Value" *Right of Way*, May 2013

Delaney C. J. and D. Timmons "High Voltage Power Lines: Do They Affect Residential Property Value? *Journal of Real Estate Research*, 1992

Hamilton S. W and Schawn G. M. "Do High Voltage Power Lines Affect Property Values?" *Land Economics*, 1995

Des Rosiers F. "Power Lines, Visual Encumbrance and House Values: A Microspatial Approach To Impact Measurement" *Journal of Real Estate Research*, 2002

**8. Share individual case studies of people, places, or things that will be affected by this project (no more than three):**

**a. Breezy Meadow Lane**

Breezy Meadow, once a 100-plus-acre dairy farm owned and operated by generations of the Love family, was subdivided into seven (7) 15-11-acre lots in the early 1990s to create the small hamlet now known as Breezy Meadow. Today, the meadow includes two private roadways, Breezy Meadow Lane and Night Archer Lane, connecting seven private homes. Four (4) of these properties support profitable agribusinesses.

These businesses include Cannabreeze, a hemp farm and the county's only CBD processing facility and event venue; Hobby Horse Vineyard, a commercial vineyard providing estate-grown grapes to local Loudoun County vineyards; a horse farm with a boarding operation; and a farmette that raises goats and chickens. Each of these properties, in addition to the others in the meadow, maintains hay fields. In addition to a thriving agriculture economy, the meadow offers a private, tranquil, and neighborly lifestyle. The spectacular early sunrises and afternoon sunsets make the meadow's view scape one of the best in the county.

The NextEra Greenfield line proposes to build a 500kV transmission line in the middle of Breezy Meadow, bisecting Cannabreeze Hemp Farm and its facilities, a horse pasture with barn facilities, several hay pastures, and private gardens. It will also destroy the view scape and devalue the businesses and homes on the adjacent properties. The transmission line will significantly impact the economics and forever alter the lifestyle in the meadow.

The economic impact to this part of western Loudoun County will be devastating, and Cannabreeze Hemp Farm & Company is a case in point. Cannabreeze opened a full-scale multi-million-dollar hemp processing and manufacturing operation in 2020. Like many other Lovettsville agribusinesses, it operates several economic enterprises to make the business profitable. Cannabreeze is a farm that produces 3,000 lbs. of dried hemp flower per year and is Northern Virginia's only CBD processing facility which services local hemp growers throughout the state. Cannabreeze also has an on-site dispensary that services customers in the tri-state area with over 70+ products, as well as an event venue that attracts thousands of tourists each year. Furthermore, Cannabreeze employs a dozen workers, many of whom are young individuals with a passion for agriculture, which is difficult to instill in the younger generation today.

The wide variation of enterprises under one umbrella represents the entrepreneurial spirit of the county residents, while it also illustrates how much time and effort it takes to build a small agribusiness that can support a family and make the local Western Loudoun economy work. Installing transmission towers on Breezy Meadow would destroy this innovative and growing business. Hemp is an annual crop vulnerable to depleted soil, weeds, fungus, and mold that are commonplace in Virginia's damp climate. The crop is planted yearly in different fields to allow the land to lay idle and rejuvenate. Furthermore, the rows in the fields must be set far apart to allow the air to circulate and minimize the moisture and mildew. Staff tills the rows constantly to keep the weeds from choking the crop. The construction of the towers would bisect the hemp farm, making it impossible to continue the specialized farming practices required to cultivate this delicate crop.

In addition, the tower's electromagnetic fields could interfere with electronic equipment in the processing facility. The impact beyond Cannabreeze would be devastating because it would slow or shut down the processing capacity for all the hemp farmers in the region. Finally, the presence of large transmission towers would negatively affect the scenic beauty of the surrounding landscape, ruin the aesthetics of Cannabreeze Farm and its event venue, and limit the number of tourists the farm currently brings to the county.

The disruption caused by construction activities and the ongoing presence of transmission towers will also be significant to the other agribusinesses and homes on the meadow. In the case of Hobby Horse Vineyard, the construction of the towers could lead to crop losses due to damage to vines or reduced productivity. The livestock operations on the meadow could see a reduction in their pastures and hay fields, diminishing their ability to feed their animals on their land. There are considerable concerns and anxiety that high-voltage transmission infrastructure poses safety risks to horses and riders. Electromagnetic fields and potential accidents related to installing and maintaining the towers could endanger individuals and animals.

The agribusinesses and homes on Breezy Meadow represent multi-millions of dollars of private family investments and express the residents' personal values for living close to the land and raising a family in a rural community. The presence of transmission towers will lower the property value of the homes in the meadow, impacting the residents' long-term financial well-being, particularly if it affects its attractiveness to investors or buyers. The loss of Breezy Meadow to the Greenfield Line will impact the economy and forever alter the quality of life in Lovettsville.

#### **b. Loudoun Therapeutic Riding, Inc.**

In 2021, after 47 years in operation serving people with special needs in Loudoun County and being a tenant at several locations around Loudoun County, Loudoun Therapeutic Riding finally purchased a permanent home at 14490 Berlin Turnpike,

Lovettsville, VA. This property is located at the corner of Ash George Road, the point where the proposed Green Line leaves Lovettsville and enters into Waterford.

Loudoun Therapeutic Riding is a non-profit organization which embraces the power of the horse and equine-assisted services to promote well-being and community inclusion for people with physical, cognitive and mental health challenges. Founded in 1974 it was the original pilot program for therapeutic riding in Virginia.

The 25-acre property is a haven for adults and children with special needs and also provides a respite for their parents and caregivers who enjoy the property while their student participates in equine-assisted services. Students and volunteers travel from Ashburn or urban areas surrounding Leesburg to escape the development of a bustling area and seek peace and tranquility that is paramount at Loudoun Therapeutic Riding. For example, teens from North Spring Behavioral Health Center come weekly to experience the healing power of horses at this quiet farm. In addition, a dozen veterans suffering from PTSD, TBIs, and depression, among other challenges, seek refuge each week through the Equine Services for Heroes program. Veterans have described the tranquil, peaceful environment that helps them unwind and reconnect with themselves, horses, and others. Seniors from local assisted living facilities, Waltonwood and Heritage Hall, visit during the mild weather to touch the horses and share memories. The serene environment is truly therapeutic for these and other guests suffering through the different challenges of life. The threat of enormous buzzing towers will create stress and anxiety that the riding community actively works to diminish for the participants coming here from all over Loudoun County. As Therapeutic Riding enters its 50th year, it is actively planning its' future in one central location. The towers will undermine the tranquil environment the therapeutic community has worked so hard to create.

### **c. Two Sister Bees**

Bees are responsible for approximately 80% of insect pollination. Two Sister Bees on Householder Road in Lovettsville raises some of those bees. This apiary has been raising honeybees for approximately 8 years for both honey production and bee colony reproduction. The proposed route of the transmission line runs right through the property where the hives are located. Raising bees is not easy, it takes a lot of work to keep them thriving. Weather, skunks, possums, bears, wasp, hornets, lantern flies, and parasitic mites all put stress on the bee hive and are major contributors to the collapse of the bee hive colonies in our surrounding area and throughout the nation. Fighting Mother Nature is hard before we add any man made "influences" like pesticides, herbicides, solar power, deforestation and now for beekeepers, massive Transmission power lines. Several articles on beekeeping state that acute exposure to extremely low frequency Electro-magnetic fields (ELF EMFs) "by transmission power lines" were found to impair the "Cognitive and Motor" abilities of the honey bee, i.e., their ability to forage towards food sources and feeding. Studies have led to a precautionary federal recommendation in the USA to **not** keep bee hives under powerlines. Furthermore, research shows that crops close to the power lines remain

unpollinated, which reduces the food production for the bees and if herbicides are used to control the ground cover under the power lines, the herbicides are now found to be very harmful to both humans and bees. Two Sister Bees has 20 hives and other apiary farms in Lovettsville have as much as 30 to 60 hives per farm. Each hive consists of 40,000 to 100,000 bees. Since honeybees can forage up to a range of 2 to 5 miles, the transmission lines will be within that Lovettsville radius for all of the apiaries. We live in an ecosystem where what affects the apiaries will then affect the pollination of local orchards, vegetable farms and farmers who raise crops of corn and wheat. NextEra needs to rethink their positioning and installation of transmissions towers in our rural area, as causing a decline in pollinator species will significantly compromise agricultural production.



**NO TRANSMISSION LINES HERE  
COMMUNITY MEETING  
MAY 1, 2024, 6 pm-8 pm, LOVETTSVILLE FIRE & RESCUE**

**(Lovettsville, VA, April 8, 2022)** The Loudoun Transmission Line Alliance: Lovettsville, will host a community meeting to inform the public about the NextEra Greenfield Proposal for Western Loudoun and to provide a comprehensive overview of the impacts on the Lovettsville area. The community meeting is an opportunity for concerned citizens to learn about the regional power grid challenges that have prompted the proposed Line and the fast-moving, consequential public policy decisions that will impact the structure and location of the Line. The public will also learn how to support community efforts to oppose the Line and advocate for alternatives to check the negative impacts on the region's economy, environment, and quality of life.

Event Details:

- What: The community will learn about the NextEra Proposed Greenfield Line, its impact in Lovettsville, and how to engage the fast-moving public decision process to oppose building new transmission towers in Western Loudoun County.
- When: May 1, 2024, 6 pm-8 pm
- Where: Lovettsville Fire & Rescue, 12837 Berlin Turnpike, Lovettsville, VA
- Who Should Attend: This public meeting is open to all. Residents of Lovettsville and the surrounding area who want to learn about the NextEra Transmission Line Proposal and its impact on Lovettsville should attend.
- Registration: Registration is requested but not required to attend. Scan the QR code below to register.

The Loudoun Transmission Line Alliance, Lovettsville, is a group of Lovettsville neighbors working to identify and quantify the impact of the NextEra Transmission Lines in Lovettsville and to inform the community about how the Towers will affect private homes, farms, and businesses along the proposed path. The Alliance has developed a website to connect the affected neighborhoods and to keep citizens informed of the fast-moving developments and public decision processes that will affect the structure and location of the proposed Line. The group has also supplied the *No Transmission Towers Here* yard signs seen around Lovettsville. You can learn about the Alliance at the website linked to the QR code below.



For information about the May 1, 2024 No Transmission Towers Here Community Meeting, contact Ellen Russ at [escully.russ@gmail.com](mailto:escully.russ@gmail.com)

For information about The Transmission Line Alliance: Lovettsville, contact Mary Terpak at [mterpak@earthlink.net](mailto:mterpak@earthlink.net)



Historic Mt Olivet United Methodist Church on Mountain Rd, founded 1880. It's in the path of the transmission line from Short Hill.



George's Mill





The Green Line towers will be built right through the middle of these hemp fields



Cannabreeze's Production and Event Facilities



Cannabreeze's young and energetic staff



Sunrise over Breezy Meadow horse farm. The Green Line Transmission line will be built right where the horses stand in this picture.



Sunset over Hobby Horse Vineyard, Breezy Meadow





View of Loudoun Therapeutic Riding ring and stable in the direction of Ash George Road.



View of Ash George Road from Loudoun Therapeutic Riding





Two Sister Bees





Two Sister Bees' Hives



## Loudoun Wildlife Conservancy

### Organizational Impact Statement

1. **Contact:** Trinity Mills, Conservation Advocacy Specialist: [tmills@loudounwildlife.org](mailto:tmills@loudounwildlife.org)
2. **Mission:** To inspire, motivate and engage people to protect, preserve and restore wildlife habitat.
3. **Constituency:** Loudoun County, and Loudoun County wildlife
4. **Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization's mission and constituency:**

Our primary concern with the Mid-Atlantic Resiliency Project is the threats it poses to wildlife habitat. As we understand that a priority for utility construction is avoiding impact to built areas, with an emphasis on homes and businesses, greenspace is most often what is carved up as a result of power demand. The manner in which transmission lines are constructed can be extremely ecologically damaging, even if it does not outwardly appear so.

The actual footprint of the construction itself is not an insignificant consideration. Even concessions such as native plantings underneath transmission lines do not serve to remedy the habitat that is lost by constructing transmission lines through natural areas. Additionally, the intensity of the construction process itself is intrusive and poses further threats to wildlife beyond habitat destruction from impacts such as excessive noise, debris, etc. Additionally, invasive species are known to be introduced and allowed to proliferate as a result of the construction process from seeds dispersed via construction equipment and taking root from soil disturbance.

To meet the goal of getting power from point A to point B, simple mathematics suggests that the most efficient route is the straightest line. When this line does not cut through a home or business, this seems the most straightforward answer for where to place a utility corridor. However, when this right of way bisects greenspace, it creates an edge effect on the habitat.

Edge effects occur when an unnatural interrupter (such as a road or utility corridor) disrupts contiguous habitat. This disruption can have serious ecological consequences, such as limiting population dispersal, constricting gene flow, and creating community imbalances from increased mortality. In a rapidly developing county such as Loudoun, edge effects are increasingly common. Edge effects are also

known to be directly linked to population imbalances in deer- as is seen in Loudoun County as the 1st in the state for deer collisions due to habitat disruption. Contiguous habitat, such as that found in western Loudoun, is vital to the health of Loudoun's ecosystems as a whole.

The most vital habitat which remains contiguous in Loudoun is that found along riparian corridors. Power lines that cross streams bisect riparian corridors which often correspond to vital ecological cores. This bisecting of riparian areas further increases edge habitat and lowers the quality of the habitat that is left following construction. Transmission lines that cross creeks and streams pose threats to a larger community of wildlife by disrupting both terrestrial and aquatic habitats.

**9. Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:**

Impacts of the constructed transmission lines have a potential to impact several of our organizational programs. We host regular bird walks, nature walks, and amphibian and bat monitoring in areas which could be traversed by the transmission lines. The negative effect of the loss in habitat from the transmission lines is likely to have an effect on the engagement of our members with wildlife at these locations in close proximity to any lines that may be constructed.

**7. List any research sources that support your projections of the impact on your mission and constituency:**

Xia Shangguang Zhao Yuan. "Influences of 500kV Transmission Lines on Wetland Ecosystem and Its Protective Countermeasures——A Case Study of the Lake Wetland

Natural Reserve along the Yangtze River in Anqing City." 气象与环境研究:英文版 4 (2016): 17–22. Print.

[https://www.gov.mb.ca/sd/eal/registries/5750mbhydrombminnesota/cec\\_docs/sccecroun d2\\_ir397part2.pdf](https://www.gov.mb.ca/sd/eal/registries/5750mbhydrombminnesota/cec_docs/sccecroun d2_ir397part2.pdf)

\*2 additional attached pdfs\*

**8. Share individual case studies of people, places, or things that will be affected by this project (no more than three):**

Our concerns with the impact of the transmission lines on habitat come to a head with specific species of concern. We understand that NextEra will be conducting a due diligence assessment of established data of endangered and threatened species that may have nesting grounds near the chosen route as is required by law. However, due to the vast swaths of private property which the transmission line may traverse, we

believe that the actual number of nesting and breeding grounds for endangered, threatened, and species of concern is higher than that which is reflected in established databases. Indications from our constituency suggests that data from the Virginia Department of Conservation and Recreation's database of Species of Greatest Conservation Need in Virginia The U.S. Fish and Wildlife Service Information for Planning and Consultation database as would be drawn on for the required Environmental Impact Assessment for species such as wood turtles, bald eagles, and others is inaccurate due to limited monitoring efforts as a result of private property constraints. We have been informed of species of concern sightings including wood turtles along Sweet Run at Sweet Run State Park as well as bat data from Sweet Run State Park.

**9. Upload any visuals available that illustrate or support your impact statement.**

Attached photo is of Jefferson Salamander (species of conservation need in Virginia) at Sweet Run State Park.



## Loudoun Wineries and Winegrowers Association (LWWA)

### Organizational Impact Statement

1. **Mission:** The LWWA enables the success of the Loudoun County wine industry by promoting agriculture, social stewardship and by facilitating marketing, legislation, education, and communications between member wineries, winegrowers and their partners.
2. **Constituency:** LWWA members include representatives from many of the Loudoun wineries and independent winegrowers, committed to the responsible growth and sustainability of the Northern Virginia wine industry.
3. **Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization's mission and constituency:** The new 500kv Greenfield Link, as proposed, extends from the foot of Short Hill mountain at the end of Longlane for 22 miles to the new proposed Aspen substation south-east of Leesburg. The proposed route cuts through the heart of the nationally recognized Middleburg American Viticultural Area (AVA) and numerous farms employing Loudoun County's prime soils consisting of Purcellville Silt Loam, Tankerville Silt Loam, and Middleburg Silt Loam. The terrain elevations between 450 and 550 feet, moderate climate and prevailing westerly winds coupled with prime soils provide excellent growing conditions for many varieties of winegrapes. This AVA is certified by The US Treasury Department Alcohol and Tobacco Tax and Trade Bureau as "a viticultural area for American wine as a delimited grape growing region having distinguishing features, a name, and a delineated boundary."
4. **Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:**
  - a. **Financial Impact to Agritourism:** Loudoun's wineries, breweries, distilleries, and cideries generated \$118 million revenue in 2022 as tourists and local residents visited to escape urban areas and enjoy "DC's Wine Country" in a relaxing pastoral environment. While those tourists are here, they stay in local bed and breakfasts, air B&Bs, hotels and motels. They dine in local restaurants and visit Loudoun farm markets. They flock to local towns for Octoberfest, Christmas Markets and other holiday events. The presence of huge towers supporting 500kv power transmission lines will severely impact the aesthetics of their experience and will certainly deter tourist visits.

**b. Impact to the Continued Growth of Loudoun County's Wine Industry:** Since 2008 Loudoun's Wine Industry has been growing at the rate of 4,2% per year. With the proposed Greenfield Power Transmission Line Right of Way (ROW) of 150 to 200 feet and a length of 20 miles it would effectively remove between 364 and 485 acres of prime viticultural farmland from ever being available for vineyard or winery use. These prime soils are not a renewable resource.

**c. Impact to Farming Operations:** The 2022 Virginia Agricultural Censuses shows 1,323 farms in Loudoun totaling 110,000 acres, most of which are in western Loudoun in soil classified as prime farmland. The 2023 Virginia Commercial Winegrape Report lists Loudoun County wine grape production as second in the state with a 2023 production of 1,795 tons on 776 acres of vineyard.

Most of Western Loudoun County is zoned for Agricultural use (AR1). This zoning, supported by **Soils Classification**<sup>1</sup> and a long-standing conscious effort to preserve and foster farming in that part of the County. Loudoun County government, supported by Virginia Code acknowledges "**Important Farmlands**"<sup>2</sup> and has designated "**Agricultural Districts**"<sup>3</sup> and promotes agricultural land use through tax incentives. Farming practices have evolved from a smaller number of large family farms to many wineries, vineyards, and smaller farmettes involved in a "farm to table" marketing approach, on site tasting rooms and self-service markets. If approved as proposed the Greenfield Link will severely disrupt these farm practices by imposing right of ways through vineyards, wineries, farms and farmettes, thereby reducing or eliminating farmable areas and discouraging on site sales of wine and farm products.

**5. List any research sources that support your projections of the impact on your mission and constituency:**

**References For Impact to Farming Operations:**

<sup>1</sup> Alex C. Blackburn, 2000, Interpretive Guide To The Use Of Soils Maps Of Loudoun County, Virginia, Soils Classification : Website "loudoun.gov" County Soil Types

<sup>2</sup> Important Farmlands : Commonwealth of Virginia State Corporation Commission Division of Public Utility Regulation "Guidelines for Transmission Line Applications Filed Under Title 56 of the Code of Virginia, Section III, paragraph F. 1 and 2."

<sup>3</sup> Zoning Ordinance **Agricultural Districts** "It is hereby declared to be the policy of the County of Loudoun to conserve, protect and to encourage the development and improvement of its agricultural and forestal lands for the production of food and other agricultural and forestal products. It is also the policy of the County of Loudoun to conserve and protect agricultural and forestal lands as valued natural and ecological resources which provide essential open spaces for clean air sheds, as well for aesthetic purposes. It is the purpose of this Ordinance to provide a means by which agricultural and forestal land may be protected and enhanced as a viable

segment of the County's economy and as an economic and environmental resource of major importance, pursuant to Title 15.2, Chapter 43 of the Code of Virginia (1950), as amended."

## Save Rural Loudoun Foundation Organizational Impact Statement

1. **Contact:** Mavis Taintor [mavistaintor2@gmail.com](mailto:mavistaintor2@gmail.com)
2. **Mission:** To preserve the historic homes, barns and features of rural Loudoun County
3. **Constituency:** residents, business owners and visitors to rural Loudoun county
4. **Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization's mission and constituency:**

- Demolition and abandonment of the many historic homes once frequented by Thomas Jefferson as a young surveyor and George Washington as a young surveyor and militia officer. Example: Bel Mont Farm Circa 1765
- Loss of Washington and Rochambeau's march route through Western Loudoun to Yorktown and the final Revolutionary War victory at Yorktown in 1781.
- Loss of the roads and paths the Army of the Potomac and the Army of Northern Virginia took on the way to the battles of Antietam/Sharpsburg in 1862.
- The negative impact of the lost history of the enslaved who risked their lives and whatever property they had to transit Western Loudoun on the Underground Railroad through rural Loudoun's back roads and paths to the village of Waterford and on to freedom and citizenship north to the Mason-Dixon Line.

[https://en.wikipedia.org/wiki/Waterford,\\_Virginia](https://en.wikipedia.org/wiki/Waterford,_Virginia)

[https://en.wikipedia.org/wiki/Hillsboro\\_Historic\\_District\\_\(Hillsboro,\\_Virginia](https://en.wikipedia.org/wiki/Hillsboro_Historic_District_(Hillsboro,_Virginia))

[https://en.wikipedia.org/wiki/National\\_Register\\_of\\_Historic\\_Places\\_listings\\_in\\_Lou  
doun\\_County,\\_Virginia](https://en.wikipedia.org/wiki/National_Register_of_Historic_Places_listings_in_Loudoun_County,_Virginia)

<https://www.hallowedground.org/>

<https://www.loudounhistory.org/history/underground-railroad/>

[https://northernvirginiamag.com/culture/culture-features/2023/06/23/eugene-  
scheel-loudoun-historian-preserves-underground-railroad-history/](https://northernvirginiamag.com/culture/culture-features/2023/06/23/eugene-scheel-loudoun-historian-preserves-underground-railroad-history/)

5. **Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:** I would recommend to the Board that we disband Save Rural Loudoun Foundation and disburse remaining funds to other not-for-profits outside Loudoun County. If the proposed powerline is built through green space in rural Loudoun County, I as the Chairman of Save Rural Loudoun foundation, would recommend to the Board that we

close the Foundation and disburse our remaining funds to not-for-profits outside Loudoun County. If one power line is built, others will soon follow. It will be “game over” for saving rural Loudoun. *Wander* Magazine, the publication of the Save Rural Loudoun Foundation would be closed down as *Wander* would no longer have the financial backing of the Foundation. *Wander* was honored to receive the prestigious Platinum Award, the top award for a print magazine publication. This award is administered and judged by the Association of Marketing and Communication Professionals (AMPC), one of the largest, oldest and most respected evaluators of creative work in the marketing and communication industry. *Wander* has built a readership of over 10,000 by focusing on Loudoun’s historic past: villages and hamlets, farms, small businesses, farm to table restaurants, and its important network of unpaved roads. *Wander* brings to life historic buildings such as the Leesburg County Courthouse where the Sheriff read aloud the Declaration of Independence in 1776. With the closing of *Wander*, the magazine’s publisher and editor will lose the funding for the work they have done for the magazine for many years.

**6. Upload any visuals available that illustrate or support your impact statement.**

I will email separately a cover of *Wander* Magazine. You can imbed the photo in the Save rural Loudoun Foundation Impact Statement.



## Scenic Loudoun Legal Defense Organizational Impact Statement

2. **Contact** Person Bill Hatch, Donna Rogers, Tom Donahue
3. **Mission** Legal defense preparation for SCC case
4. **Constituency** Mt. Gilead–Digges Valley area plus others with same interests
5. **Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization’s mission and constituency:**  
 SLLD will need to finance legal and technical advisory fees if we choose to be respondents to an SCC review of NextEra’s application. We will need to prepare as best possible even before the route is specified, including area environmental and economic impact studies and technical alternatives.  
 SLLD has particular concern with a repeat of the 2005 proposal to route the line through Mt. Gilead and Digges Valley, which include parts of the Goose Creek Historic District and about 2,000 acres of conservation land originally settled by the Quakers in the mid- 18<sup>th</sup> Century.  
 SLLD has great concern with power lines undermining the conservation easement system that preserves open land against pressure from housing development. Conservation easements also protect natural resources, including forests, wetlands, streams, wildlife, and prime agricultural soils.  
 SLLD is also concerned by disruption of the rural economy (\$1.6 billion related to tourism in Loudoun County as of 2022), including farming and vineyard operations and the resulting disincentive to invest in these businesses. SLLD is also concerned by the loss of property value for businesses that depend on viewsheds to attract tourism.  
 SLLD is also concerned by loss of property value for residences, particularly those with views across the open spaces of Loudoun Valley.
6. **Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:**  
 We need a specific route to assess the actual impact on environment, local businesses, residences, and viewshed (impact on tourism generally and property values).
7. **List any research sources that support your projections of the impact on your mission and constituency:**  
 SLLD fought the 230 kV line proposed to go through Digges Valley in 2005-08. The case was resolved by using route 7 with one part underground along the existing right of way (W&OD trail) to avoid houses in Shenstone.
8. **Share individual case studies of people, places, or things that will be affected by this project (no more than three):**

Farms, tourism (wineries, equestrians, cyclists), residents (property values), including Zephaniah Farm and Vineyard, the Brookside Dairy, and Digges Valley Farm.

**9. Upload any visuals available that illustrate or support your impact statement.**

See map of routing study done in 2005 for proposed lines through the Digges Valley area.

**Environmental Considerations for Digges Valley, Loudoun County  
Originally Prepared for Conservation Easement Application with the Nature  
Conservancy**

Specifically, the Property contains over four miles of creeks and tributaries to Crooked Run, a major tributary to Goose Creek. The Goose Creek stream system has been identified as an aquatic portfolio site in the Northern Piedmont by the Nature Conservancy's ecoregional planning process. It supports dense populations of sport-fish and a wide diversity of non-game fish species. Species include large and smallmouth bass, rock bass, pumpkinseed, bluegill, redbreast, bullhead, and green sunfish. The Goose Creek also supports several species of darters and daces which are indicator species for the health of the system.

The Property lies within an area identified by the Virginia Department of Conservation and Recreation, Division of Natural Heritage, as containing *Hesperia attalus slossanoe*, the dotted skipper (a butterfly), a G2G4T2T3 SH ranked species; and within two miles east of area containing *Salix exigua*, the sandbar willow (a shrub), a G5S1 ranked species.

In addition, this Conservation Easement is granted "exclusively for conservation purposes" under §170(h)(1)(C) because it complies with the "open space" conservation purpose test under §170(h)(4)(A)(iii) of the IRC. Specifically, the preservation of open space on the Property (i) is pursuant to clearly delineated state and local governmental conservation policies that indicate the type of property identified by representatives of the general public as worthy of preservation and (ii) will yield a significant public benefit.

The Property lies adjacent to lands under open-space easement deeded to the County of Loudoun and to the Virginia Outdoors Foundation and contributes to the open-space values of such land under easement.

The general and specific open space conservation values of the Property and the clearly delineated governmental conservation policies pursuant to which this Conservation Easement preserves those values are described below:

**a) Agricultural Use.**

(i) The Property contains "a land area of five contiguous acres or more devoted to production for sale of plants or animals under standards prescribed by the Commissioner of Agriculture and Consumer Services, or

land devoted to a soil conservation program under an agreement with an agency of the federal government" (see Virginia Land Conservation Foundation, Land Preservation Tax

Credits – Conservation Value Review Criteria Adopted November 21, 2006 and amended August 7, 2008 and March 27, 2009 (the “**VLCF Criteria**”), lines 73-76, citing 2 Virginia Administrative Code (“**VAC**”) 5-20).

(ii) The Property contains land that meets the U.S. Department of Agriculture’s Farm Designation.

(iii) Loudoun County has recognized the importance of the continued preservation of the Property as agricultural land by providing Use Value Assessment of the Property for real property tax purposes.

b) Conservation and Open Space Lands Designated by Local Governments.

1. (i) The Property includes “lands that contain features, resources, values, or other attributes that a federal, state, or local government has officially designated as important to protect from inappropriate development so as to help shape the character, direction and timing of development in the area” (VLCF Criteria lines 334-337).
2. (ii) The Loudoun County Comprehensive Plan encourages the use of open space easements to protect agricultural resources, preserve farms, forests and open space and the rural character of the landscape in Rural Areas (Chapter 4 – Land Use, Comprehensive Plan for the Town of Hamilton and JLMA 2003-2020).
3. (iii) The preservation of the Property will further goals of the Loudoun County Comprehensive Plan to “establish land uses compatible with historic, open space and scenic areas”, and to “preserve the cultural, social, economic, environmental and aesthetic amenities provided by agricultural land use to both Loudoun County and the region” and to “conserve agricultural resources and avoid environmental pollution which would degrade the farmland, the natural environment and the surrounding communities” (Chapter 6 – Natural Resources-Hamilton, Comprehensive Plan for the Town of Hamilton and JLMA 2003-2020).

(iv) Land use policies of the County of Loudoun as delineated in Loudoun County’s Revised Comprehensive Plan adopted July 23, 2001 (as amended March 2011) to which plan the restrictions set forth in this deed conform as follows:

a. the Property is located within the Potomac River Watershed, an area planned for special environmental protection in the Loudoun County Comprehensive Plan, and in the Critical Areas Report prepared by the Division of State Planning and Community Affairs for the General Assembly of the Commonwealth of Virginia, the Potomac River being a public water supply source; and

b. Chapter 5 of the Loudoun County Comprehensive Plan, entitled “The Green Infrastructure: Environmental, Natural and Heritage Resources,” and Chapter 7 of said plan, entitled “Rural Policy Area,” encourage the use of conservation and open space easements to protect agricultural resources, preserve farms, forests and open space and the rural character of the landscape in rural areas; and preservation of the Property is pursuant to local governmental conservation policies and will yield a significant public benefit, consistent with said Comprehensive Plan, by:

(i) implementing the “Green Infrastructure Strategy” of the Loudoun County Revised Comprehensive Plan, including County policies to “promote private, state and federal conservation programs and their allocated resources to advance conservation programs

within the County through public and private means such as voluntary easements,” (at 5-3); to “protect river and stream corridors by preserving, conserving, and restoring their water quality, flood protection, aquatic and wildlife habitat, and scenic value,” (at 5-4); to pursue conservation of “river and stream corridor assets through open space dedication or easement, purchase of development rights, and other such programs to ensure the protection of these resources for the public good,” (at 5-4); to “promote the preservation of forested areas through the use of... easements and other voluntary means,” (at 5-18); to “seek through...open space easements the preservation of greenways,” (at 5-25); to “encourage the use of open space easements as a way to complement and enhance the Green Infrastructure and its elements,” (at 5-26); to support an “integrated Green Infrastructure approach to help prevent habitat fragmentation while enhancing ecological connections with larger natural areas,” (at 5-19); to “proactively promote state and federal conservation policies such as...voluntary easements,” (at 5-3); to use “protective buffers [and] donation of open-space easements...by the County and individual property owners to manage open space assets,” (at 5-24); to “seek and encourage...the preservation, protection, and management of forest resources for their economic and environmental benefits,” (at 5-18); to “fully protect, through easement... the lands that are critical to the quality of key water supplies,” (at 5-10); and to “promote the planting and preservation of trees as a means to improve air quality,” (at 5-27); and

(ii) advancing the Rural Policy Area goals of the Loudoun County Revised Comprehensive Plan to “explore and pursue all available federal, state and local options for acquiring conservation easements,” at (7-9); and to “protect [the County’s] natural and cultural-resource base (including stream corridors, wetlands, steep slopes, ridges, mountains, working landscapes, woodlands, historic and archaeological resources, habitats, greenways...in order to preserve the rural character of the land and the social and experiential aspects of the rural way of life,” (at 7-4).

K. Preservation of the open space characteristics of the Property as provided in this Conservation Easement will yield the following significant public benefits, taking into consideration factors suggested in Treas. Reg. §1.170A-14(d)(4)(iv)(A):

1. 1) As described above, protection of the Property is consistent with the conservation values enumerated in the VLCF Criteria and this Conservation Easement provides significant public benefit by protecting the conservation values of the land in perpetuity.
2. 2) Protection of the Property provides significant public benefit by contributing to protection of the Chesapeake Bay. The Property contains approximately 25,000 linear feet of frontage on unnamed creeks and tributaries to Crooked Run, which flows into Goose Creek, a tributary of the Potomac River and the Chesapeake Bay. Protection of the Property along these tributaries, together with the forested and vegetated buffer zones, is consistent with the purposes and policies of The Chesapeake Bay Preservation Act, §§10.1-2100 to 10.1-2116 of the Code of Virginia (the “**Chesapeake Bay Preservation Act**”) and the Loudoun County Comprehensive Plan, which promotes regulations and criteria for land use controls to protect water quality in the Chesapeake Bay and its tributaries, including Crooked Run and Goose Creek, which drain to the Potomac River.

3. 3) Protection of this Property also provides significant public benefit by contributing to the goal of Virginia Governor Bob McDonnell's administration to achieve and surpass the obligations under the Chesapeake 2000 Agreement by preserving an additional 400,000 acres of land in Virginia by 2014. In the Chesapeake 2000 Agreement, the Governor of the Commonwealth of Virginia and the Administrator of the United States Environmental Protection Agency acknowledged "that future development will be sustainable only if we protect our natural and rural resource land, limit impervious surfaces and concentrate new growth in existing population centers." A goal of the Chesapeake 2000 Agreement is to "expand the use of voluntary and market-based mechanisms such as easements...to protect and preserve natural resource lands."

From: "David Edwards" <David.Edwards@dhr.virginia.gov> To: <hsiebent@loudoun.gov>  
Date: 5/19/2005 11:32:26 AM

Subject: Proposed Addition to Goose Creek Historic District Dear Heidi:

Thank you for giving me the opportunity to comment on the proposed expansion of the county- designated Goose Creek Historic District. As the author of the National Register nomination of the original Goose Creek Rural Historic District in 1983, I am familiar with the history of this large Quaker settlement, its well-preserved farms, and historic architecture. The proposed expansion appears to meet the same criteria that made the original district eligible for listing on the National Register of Historic Places. The farms on the east side of Route 704 contain historic structures from the 18th, 19th, and 20th centuries that are similar to the historic architecture within the original district. The agricultural landscape of the expansion area is also similar, and the farms share a similar history of original Quaker settlement from the eighteenth century. After reading the materials submitted by the applicants and driving throughout the proposed expansion area recently, I concluded that the applicant farms did warrant inclusion in the Goose Creek Historic District. In fact, I recommend expanding the district to include both sides of Diggs Valley Road which is an exceptionally well-preserved agricultural landscape. This will be my suggestion for an expanded National Register district if an application is submitted to DHR. I hope these comments are helpful in your deliberations concerning an expansion of the local district.

Best regards,

David Edwards

Director, Winchester Regional Office Department of Historic Resources



**Waterford Foundation, Inc.**  
**Organizational Impact Statement**

- a) **Contact Person:** Stephanie Thompson, Executive Director
- b) **Mission:** Our mission is to preserve the historic buildings and open spaces of the National Historic Landmark of Waterford, Virginia, and, through education, to increase the public's knowledge of life and work in an early American rural community.
- c) **Constituency:** Waterford residents, Loudoun County residents, former Waterford and Loudoun residents, historians, Waterford Fair volunteers, educators, and others interested in National Historic Landmarks and history
- d) **Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization's mission and constituency:**

The proposed pathway of the transmission lines passes through the easement-protected open space owned by the Waterford Foundation called the Phillips Farm. The towers and lines, along with the cleared area required for their installation, would forever destroy the historic view shed that is an important element in Waterford's National Historic Landmark designation. The Phillips Farm property is a natural wetland with rolling hills and valleys that is a haven for wildlife, birds, insects, and plant life. Its hedgerows and farmland invoke the village's agricultural past. The Catoctin Creek that passes through the property was home to indigenous peoples as early as 12,000 years ago and was the site of permanent settlements 9,000 years ago. Today, one can visit the village and walk in the open spaces and imagine the lives and histories of people who first settled the village in 1733 and who experienced some of the most critical events in the history of the British colony and United States for over close to 300 years. The destruction of the view shed and a large portion of the Phillips Farm property would forever alter that experience and diminish the educational value of a visit to Waterford. It would also uproot numerous species and plant life that define the natural habitat.

- e) **Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:**
  - a. **Financial Impact:** The Foundation currently hosts as many as 60,000 visitors to Waterford each year, including students who attend our programs on segregated education, reconstruction, and African American history. The Waterford Annual Crafts Fair draws as many as 15,000 individuals each year

and is one of the primary means of financial support for the Waterford Foundation. Those visitors are less likely to choose to come to Waterford when the view shed does not reflect the 18<sup>th</sup> and 19<sup>th</sup> century periods reflected in the events and educational programs held here. If visitors choose not to come here, the Foundation would no longer be capable of financially supporting the necessary preservation and education efforts that cost the Foundation as much as \$500,000 each year. The Foundation receives no Federal or state monies and is completely dependent on funds from donors, events, the annual Fair, and educational programs. The Foundation would also likely lose its National Historic Landmark status and would eventually fail.

- b. **Blow to Preservation Efforts:** Should the Virginia Outdoors Foundation easement on the affected property through which the transmission line pathway traverses not remain in force, the future of preservation easements throughout Virginia will be at high risk. Current easements through the VOF and other entities would no longer offer concrete protections against utility and other infrastructure projects. Property owners would not be willing to invest the time and funds required to ease their lands, resulting in increased development, pollution, and the loss of historic sites that can never be replaced. The financial failure of the Waterford Foundation would leave a huge gap in Virginia's preservation and education efforts and would be a stain on the state's reputation for preserving the unique history of one of the original 13 colonies.
- c. **Diminution of the Foundation's Education Programs:** The Foundation hosts as many as 35 classes of fourth graders each year. They learn about African American students' experience in a segregated, one-room schoolhouse built in 1867 after the Civil War. Seventh grade students visit Waterford to learn about the lives and experiences of Waterford citizens during the period of Reconstruction through the Jim Crow era. This program is enhanced by the unique history of Waterford as a village that sided with the Union during the Civil War, was populated by abolitionist Quakers, and suffered severely at the hands of former Confederate supporters. High school students in Loudoun County Advanced Placement History and African American History classes tour Waterford to learn about the unique African American heritage of Waterford as a colonial and federal period village that welcomed free African Americans and formerly enslaved people who built prosperous lives here. All of these programs are enhanced by the experience of being able to imagine life as it was in the 1700's, 1800's, and 1900's. Students will no longer be able to walk around the village and its open spaces and imagine its agricultural history with 300 foot tall power lines looming over the village.

**f) List any research sources that support your projections of the impact on your mission and constituency:**

There are currently 4,426 preservation easements in Loudoun County today according to VOF.

Waterford Foundation records can document the number of visitors to the village each year, the number of Fair visitors, and the number of students who visit.

**g) Share individual case studies of people, places, or things that will be affected by this project (no more than three):**

There are 32 historic homes and other properties that border the Phillips Farm property owned by the Foundation and on which the transmission lines would be built. The property value of those homes would be diminished significantly. A 2018 study from the Journal of Real Estate Research found that vacant lots near high-voltage power lines sell for 44.9% less than equivalent lots that aren't located near power lines. If you take a step back, a lot that is located within 1,000 feet of transmission lines tends to sell for 17.9% less. There would also be no home or property within the 1420 acre protected National Historic Landmark where the lines would not be visible. The value of all of these properties would also be diminished. The Waterford Foundation owns 13 historic properties and would experience heavy financial loss of the value of its assets.

The Phillips Farm property currently produces income for the Foundation from the rental of the property to a farmer who grows hay there. The transmission line path would significantly reduce the amount of acreage available for farming, reducing the hay output for the farmer's cattle and the amount of rent the Foundation could collect from him. That same farmer's land would also be significantly affected by the transmission line pathway, as it would bisect his farm, making a huge portion of his land unusable. His farm would no longer be a viable farmstead.

One of the Foundation's walking trails is located within the portion of the Phillips Farm through which the lines would be built. People would have no interest in hiking that trail in the future. In addition, the International Agency for Research on Cancer regards the link between childhood leukemia and the presence of power lines as sufficiently well established to rate extremely low frequency magnetic fields as a "possible" human carcinogen. People would not choose to hike or want to live in an area that is possibly dangerous to their health.

**h) Upload any visuals available that illustrate or support your impact statement.**

**Projected Path Through the Phillips Farm (yellow dotted line)**



**Farmer who leases the Phillips Farm Standing in the Transmission Line Path (Jim MacIntosh)**



**Phillips Farm Trail Map**





**Villager walking on the Phillips Farm Trail**



**Sunset over the Phillips Farm**





Post Office Box 142 • Waterford, Virginia 20197 • 540-882-3018 [www.waterfordfoundation.org](http://www.waterfordfoundation.org) • [info@waterfordfoundation.org](mailto:info@waterfordfoundation.org)

April 1, 2024

Dear members of the Loudoun County Board of Supervisors,

Thank you for the dedicated support you have shown for Waterford and Western Loudoun over the years. We are appreciative of your efforts and are hopeful that this support will extend to the issue of power lines in both Eastern and Western Loudoun.

As you consider the current issues facing the Landsdowne community regarding proposed power lines, please know that the Foundation fully supports their efforts. On behalf of The Waterford Foundation Board of Directors, we ask that the Board of Supervisors take action to protect the County, all County residents, and County businesses who will be negatively affected by these power lines and substations. We would hope that you would take an active role in every legal and administrative process available to the Board of Supervisors to make sure that citizens' and businesses' voices are heard and that the County's interests are protected.

Both Eastern and Western Loudoun are under threat, especially now that NextEra has applied to have the MARL project considered a National Interest Transmission Line. If Loudoun is to remain a desirable place to live and do business with a balanced and diverse economy, the Board will need to be forceful and innovative in advocating for pathways that utilize only existing rights of way. The Board should look at all available alternatives and possible actions to prevent the destruction of our quality of life and sense of place.

We ask that you act to protect the scenic, historic, economic, and environmental assets that make Loudoun a desirable place to live, work, and play.

Sincerely yours,

Susan Manch, President, Waterford Foundation Board of Directors

## Residential Impact Testimonials

| Name, or what you wish to be called: | Where are you located?           | What do you love about rural Loudoun?                                                                                                                                                                                                                                                                                                                                                                                 | How would the construction of these transmission lines in rural Loudoun affect you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Beverly                              | Waterford                        | There are so many things to love: the horse community, wineries and breweries, hiking and equestrian trails, farmers who raise organic crops and pasture raised meats, abundant wildlife and the gorgeous scenic views especially the Catoclin mountains. People of rural Loudoun are hard-working, community connected and preservation minded people who love this beautiful land we've been entrusted to care for. | The proposed lines will be directly along our property line. The effect would destroy our home and 1 businesses as we operate 2 businesses from our home where clients come to us.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Linda                                | Waterford Virginia               | I love the beautiful vistas, the many beautiful and historic farms and villages. I also love the fact that we have many excellent venues such as wineries, craft breweries, and general rural activities. I especially love living in Western Loudoun and the quiet low key lifestyle, being close to nature and having my various farm animals to care for.                                                          | Construction of these transmission lines would ruin much of what is special about Rural Loudoun. They would cut through some of the most beautiful, scenic and historic landscape in the state of Virginia. There are dozens of rural business that would be negatively affected by these proposed lines through either the destruction of the viewshed that brings thousands of visitors each year, to the outright destruction of their properties and businesses due to the easement requirements. The same would be true for hundreds, if not thousands of rural residents, many whose properties are in conservation easement or have had properties in their families for generations. |
| Ellen                                | Breezy Meadow Lane, Lovettsville | The beautiful sunsets over rolling hills and valleys.                                                                                                                                                                                                                                                                                                                                                                 | The current projection is that the transmission line will be built on Breezy Meadow. It will run right up the middle of my neighbor's pasture, just a few yards from the end of my property line. There are six homes on the near 100 acre meadow, five with profitable agribusinesses, including a hemp farm, a vineyard, and multiple horse and livestock farms. The                                                                                                                                                                                                                                                                                                                       |

|          |                                                                |                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------|----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                                |                                                                                                                                                                                                                            | 500kv line would destroy our viewscape, devalue our property, and ruin the ecology and economy of our small community.                                                                                                                                                                                                                                                                                                                                                                                                     |
| William  | Waterford                                                      | The pristine beauty of the open spaces, the rich history of the region                                                                                                                                                     | They would pass right through the property directly behind my house, destroying the view                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Mary     | N side of the intersection of Rte 9 and 704                    | Openness, relative absence of intrusive businesses, quality of life, community but also privacy. My 30-yr-old daughter remarked on a recent visit, Mom, thank for raising us here.                                         | They would completely negate our 35-year-long efforts to restore our historic property.                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Carmel   | Hamilton Station Rd, just outside the Waterford Village limits | Peaceful views of the mountains from our farm; riding our horses in the country; locally grown food; wide open spaces; less traffic on the rural roads                                                                     | Power lines would completely contaminate our views of the mountains; significantly reduce our property value; popping and crackling of the lines will spook our horses, making riding in the country less safe. Construction and maintenance of the lines will increase truck traffic and noise.                                                                                                                                                                                                                           |
| Joy      | Lucketts                                                       | Scenic beauty, fresh air, clean environment, farming, agriculture, less congestion                                                                                                                                         | Destroying the very reason I love living in rural Loudoun.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Caroline | lovettsville                                                   | the kindness of strangers, the natural beauty, the ability to see the stars clearly. The sounds of animals, but also the quiet and silence. so much variety of wildlife to see. clean air. the small community atmosphere. | i would be able to see the lines from my front porch and all windows on the west side of my house. my view of Short Hill would be permanently destroyed with the UGLY view of power lines and towers. I would likely be able to hear the hum of the lines. there is a high likelihood that the lines would cause more migraines or at least aggravate symptoms from my veteran spouse.                                                                                                                                     |
| Aliza    | Lovettsville                                                   | I love the natural land, the dirt roads, the quietness and feelings of being in a small country town.                                                                                                                      | My husband and two girls moved to Loudoun County, from neighboring Fairfax county, in hopes to enjoy a more rural, open countryside. I am an avid runner and the construction, stop and go traffic at lights and constant sound became very unsettling every time I went outside. I lived close to the W&OD trail and would often try to run that route or incorporate it into my runs. However, the constant hum of the power lines was just as annoying as the leaf blowers, lawn mowers and construction. We decided we |

|        |                                             |                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |                                             |                                                                                                                                                                                                              | wanted better, more natural open space for our daughters-so we moved further west believing western Loudoun County was the perfect fit. I have fallen in love with running on the dirt roads, with the fields and woods as my backdrop. The girls have learned the sounds of birds, trickling water and the meaning of quiet. However, now we are beginning to realize Loudoun County is at risk of losing its charm to large power lines to support the energy usage of data centers. The power lines are set to be cutting through the western part of this county, disrupting residents who have lived here, (much longer than myself) in addition to the Agritourism that has flourished in this area |
| Lowell | 38816 Householder Rd, Lovettsville VA 20180 | Mix of legacy farmland and low density neighborhoods yet close enough to commute to employment centers is a rare and valuable combination.                                                                   | Current plan is to run the lines through the middle of a neighborhood bordering Picnic Woods will destroy that neighborhood where many of our friends live. Line needs to be routed west around that neighborhood.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| David  | Taylorstown, VA                             | I have lived in Loudoun County for more than 30 years, I really value open spaces, the ability to be close to nature and want to preserve everything that makes this county unique and wonderful to live in. | Construction of the lines would be a permanent eyesore since I commute daily under the proposed path of the new lines. I would be continuously reminded of the threat to property values and our way of life in the county. using the existing right of way is the right long term solution, even if it costs more to accomplish.                                                                                                                                                                                                                                                                                                                                                                         |
| Don    | Breezy Meadow Ln, Lovettsville VA           | The relaxing and scenic views                                                                                                                                                                                | The lines would cross the corner of my property potentially impacting my ability to sale at retirement and impacting my views until I retire.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Debbie | Loudoun Orchard Road Leesburg               | I love the beauty of the land, the vistas of the mountains, the rich history, I even love the gravel roads. There is so much character here that needs preserving.                                           | I remember driving to upstate New York and seeing the wind turbines lining the crests of the mountains. It was jarring and really spoiled the beauty of the mountains. Transmission lines are even worse visually. I know that they emit noise that would impact                                                                                                                                                                                                                                                                                                                                                                                                                                          |

|        |                  |                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |                  |                                                                                                                                                                                                                                                                                                                                                                                                            | their surroundings, especially livestock. We have already seen significant loss of farms in the county and I believe that these transmission lines would have a severely negative effect on the agricultural businesses.                                                                                                                                                                                                                                                                                                                                                               |
| David  | Lovettsville     | Open space. Farms. Spectacular, unspoiled views.                                                                                                                                                                                                                                                                                                                                                           | Most certainly my property value would be negatively, and significantly, affected. Importantly, I anticipate my mental health to suffer as well, every time I look out and see power lines instead of the rural setting I have enjoyed for over 20 years. More insidiously, I anticipate a big impact on local agriculture. We have a small Christmas tree farm. Many of our customers come back year after year, and always talk about how beautiful this area is. Having a monstrous power line cutting so close to our property will no doubt change that perception for the worse. |
| Aubrey | Waterford        | The beauty, the sense of community, the VIEWS                                                                                                                                                                                                                                                                                                                                                              | We have a small farm right outside the village of Waterford. Our kids go to school at Waterford Elementary. Many depend on agro-tourism for their livelihoods. Our farm is a huge investment. Huge power lines drastically decrease property values, those who depend on the bucolic scenery to draw business, will no longer thrive, less tax dollars, people moving out of the area, potential loss of historic designation - it hurts the entire community.                                                                                                                         |
| Brandi | Lovettsville     | The natural beauty, the wildlife and the peace they bring.                                                                                                                                                                                                                                                                                                                                                 | The whole landscape would be forever changed in a negative way                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Eric   | Lovettsville, VA | I leave the city to come home to my little farm. My kids have chickens, we are planning on raising our own meat. On any given day I'll see owls, foxes, hawks, the local bald eagle, and deer on my property. This is why I moved here, we don't want the urban life. Go to my website at <a href="http://www.capturinghisglory.com">www.capturinghisglory.com</a> and see why I live here with my family. | The power lines will be larger than anything else around. I will be less than a 1/4 mile from them, and I will hear the crackling of the power, and my line of sight will no longer be unobstructed but rather have towers with aircraft warning lights 24/7. Additionally, the federal government says the health conditions around these sites for people and animals is                                                                                                                                                                                                             |



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|       |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | questionable. The Federal government cannot say with absolute certainty my family will be as safe as it is right now, in a home I chose specifically because of its location and safety. So, in the end you will condemn my property unless you bury the lines. In the photo I am uploading LOOK AT THE SCALE PHOTO WITH 110FT (TEN to ELEVEN STORY) POWERLINES YOU ARE DROPPING ON MY HEAD AND TELL ME YOU ARE NOT CONDEMNING MY PROPERTY! |
| Kelly | Hillsboro                                          | The unobstructed views and quietude around our farm and the many other rural areas in Loudoun. Our farm is our escape from our more frenetic daily work environment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | It could drastically reduce the value of our farm/horse property if put on it or within the viewshed. It would likely reduce our BnB income and our fledgling cidery as well                                                                                                                                                                                                                                                                |
| Bill  | 19381 Dunlop Mill Road+<br>39676 Mount Gilead Road | WE Farmed our Farm for 74 years. Dairy> GrowGrass fed Angus>Grow Wine>Grow Sheep Grow Family. Our farm is not only beautiful but is instrumental in our lives and the lives and the economy of Loudoun County.                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Our farm depends on Wine Tourism for Direct To Consumer Agrotourism. Our wine is directly tied to saving the farm from annihilation of the farmland we have protected from urban development.                                                                                                                                                                                                                                               |
| John  | Hillsboro, VA                                      | Natural beauty and no urban congestion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Proposed routings do no use existing rights of way and disrupt residents.                                                                                                                                                                                                                                                                                                                                                                   |
| Mary  | Lovettsville, VA                                   | Rural Loudoun is a beautiful area. I love the strong sense of community, the awareness and appreciation of the history here, which is all around us in the form of our farms, old stone houses, churches, livestock, our rural villages and miles of dirt roads that connected neighbors 200 or more years ago and still do. In Eastern Loudoun the villages have been obliterated, but in rural Loudoun they remain a living, thriving embodiment of our past, our present, and if not destroyed, our future. This is a treasured place, and if you are fortunate enough to live here you know, you can feel in your bones, how important it is that it be preserved. | If they come across my land, or in my viewshed, or anyone's land or viewshed they will change our homes, our neighborhoods and rural Loudoun forever. Putting them anywhere in rural Loudoun would be a desecration.                                                                                                                                                                                                                        |
| Laura | Dunthorpe Lane,<br>Hillsboro, VA<br>20132          | Natural beauty and its history                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The Blue Ridge is still essentially unchanged and having huge transmission lines would alter it forever.                                                                                                                                                                                                                                                                                                                                    |

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| Christina and John | Dunthorpe Farms Community, Hillsboro, VA | peace and quiet and the views!                                                                                                                                                                                                                                                                                                                              | The construction of the transmission lines would ruin the beauty of the natural view we enjoy. The swath of trees that would need to be taken down would hurt the forest and the flora and fauna. We moved to Western Loudoun to live in an area unspoiled by all the development seen in Eastern Loudoun. It's disgraceful what has been allowed to happen to the beautiful farms.                                                                                                                                       |
| Tammer             | Hillsboro                                | The historic and scenic landscape. The rolling farms and the surrounding countryside. The humble nature of the people and the growing diversity.                                                                                                                                                                                                            | There is a significant impact on health, land use and management, and the environmental footprint of the process and its long-standing impacts to the region as a whole.                                                                                                                                                                                                                                                                                                                                                  |
| Laurel Hill Farms  | 16191 Hamilton Station Rd Waterford, VA  | tranquility, views, open space, wildlife and farming                                                                                                                                                                                                                                                                                                        | ruin all of the above, impact our airbnb/vrbo business in a historic home                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Kimberley          | Waterford                                | The natural beauty of the land, the diversity of the population, the evocation of rural living but with access to the conveniences of modern life.                                                                                                                                                                                                          | The transmission lines will scar the landscape and ruin the unique and special beauty that is rural Loudoun County. It will harm small businesses and farmers by ruining the landscape and changing the environment, thus decreasing tourism and community engagement as well as lessening their future commitment to Loudoun County. It will harm the wildlife beyond the damage done by continued housing development. It will forever and irrevocably make Loudoun County "just another major city strip-mall suburb." |
| Petrina            | Bolington Road, Lovettsville             | we moved here in 2013 because of the agricultural character of rural Loudoun, the beautiful views of the mountain, the ability to have 20 acres of property and pet horses, as well as the ability to engage in agriculture: jam making, cow raising, etc. We love the care that our neighbors give to the land and the opportunities for agritourism here. | We are already severely affected by the proposal to construct transmission lines. Our house went on the market a few weeks before the proposal for new transmission lines became public - - we are moving to NE Connecticut to be closer to our son who lives in Providence RI.<br>The area we are moving to is very much like rural Loudoun. The proposed path of the line across Bolington Rd. is 1/2 a mile from our property. Although we do not believe that it could be seen from                                   |

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|                    |                    |                                                                                                                                                                                                                                                                                                                                                                                                                                               | our property, near Picnic Woods Rd, we have already lost two potential purchasers who are concerned with the transmission lines.                                                                                                                                                                                                                                                                                                       |
| Kris               | Leesburg, Virginia | I love the beautiful rolling farmland and knowing that the produce stands are selling local products. I love that I can go out on country roads and trails, and be immersed in the sounds of birds, and the wind in the trees. The trees and all the green help mitigate climate change and protect us from the heat experienced in completely developed areas.                                                                               | There are places on the W&OD Bike Trail engulfed in the sound of data centers, completely barren of any natural sounds. The construction of the transmission lines would signal that I lived in a community that didn't care about preserving and protecting our valuable natural surroundings, our food sources, our history, and a great place for our children to grow up. I would want to leave.                                   |
| Jodi               | Lovettsville, VA   | The quiet beauty                                                                                                                                                                                                                                                                                                                                                                                                                              | It would destroy our equine business and reduce our property value.                                                                                                                                                                                                                                                                                                                                                                    |
| Rurik              | Hamilton           | The trees and lack of industrialization towards Hamilton and less towards Purcellville                                                                                                                                                                                                                                                                                                                                                        | My best friend's barn would be shut down, causing him money problems, horse and animal problems, and he would not be able to continue his horse riding career                                                                                                                                                                                                                                                                          |
| Carlo              | Charles Town, WV   | The valley is just beautiful. The pastures and farms remind me of the small agricultural roots in the community. The small towns that dot the area have been kept up to its historic character and I cherish that.                                                                                                                                                                                                                            | The damages would be ugly and a stain on rural Loudoun destroying and preserving for generations what was once Loudoun County if it were to go through. The destruction of natural areas would mount even more pressure on the animals that live in these areas.                                                                                                                                                                       |
| Waterford resident | Loudoun County     | Despite its rapid growth, Loudoun County continues to remain a sanctuary for historical and natural beauty. Waterford, Virginia--a National Historic Landmark--and its surrounding area draw visitors from far and wide to experience all it has to offer and the charm of "old Loudoun." From home and garden tours to vineyards and the view of the Blue Ridge, rural Loudoun takes us back to a simpler time in peaceful wide open spaces. | The proposed transmission lines threaten all that Loudoun stands for. As a Waterford resident, the placement of these lines, specifically across the preserved Phillips farm, will destroy the viewshed and attraction for visitors that residents have worked for years to defend. The farm is host to multiple forms of plant and wildlife, and the negative impact of this construction and its secondary effects will be enormous. |
| Steven             |                    | Nature                                                                                                                                                                                                                                                                                                                                                                                                                                        | Reduce quality of life                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Jill               |                    | The unique relationship between the rural community of Western Loudoun and the population center of Eastern Loudoun                                                                                                                                                                                                                                                                                                                           | Transmission lines belong in industrial areas, not in our precious green spaces.                                                                                                                                                                                                                                                                                                                                                       |

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|           |                             | is truly remarkable. Having lived in Eastern Loudoun for 22 years, I was overjoyed to begin my family's next chapter in Lovettsville this December. My hope is to create a small farm that can be an oasis and place of respite for my family and friends.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Constructing the lines would devalue my property, potentially impact my ability to farm the land, and steal the beauty that we all enjoy.                                                        |
| Lori      | Lovettsville                | My family has been farming this land since the 1960s. When my father bought this farm and commuted two hours to farm here every single day until he eventually moved here in 1990, I can assure you he never thought the day would come that the beauty of Loudoun County would be scarred by huge transmission towers going through his land in order to power a poorly planned Eastern Loudoun! The lines are proposed to go right through this farm and I am sick about it. On one hand the BOS took our land value away so they could continue to enjoy the country viewsheds and then they turn around and take more value away by allowing the monopoly power company to just do whatever they want to with our land. I am angry and I am hurt and I am sad for this county. | The lines are slated to go directly through our farm. They will be ugly, hazardous and the land value will plummet. The lines will disrupt wildlife and agriculturally, they will be a disaster. |
| Anna      | Lovettsville                | People, peace, beauty, feel of country side                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Friends would have property affected including my dressage trainer whose property would be severely affected along with her livelihood                                                           |
| Beth C    | Lovettsville                | We moved here to raise kids and enjoy the privacy, health, peace, and beauty of it. It's the perfect slice of America. Wineries, equestrian, hiking, farms, historical and religious significance, and veteran recovery homes. It's implausible to think anyone wants to ruin all that when an approved corridor exists.                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Transmission lines completely and needlessly destroy everything that is valued about where we live, ruin our home value, and will destroy our health.                                            |
| Connie    | Waterford VA                | Pastoral landscape, viewshed, historic homes, rural roads, agriculture, sheep, cows, horses                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | It would destroy our property value; would destroy the peaceful, pastoral views; would ruin tourism; would devastate the village of Waterford (a National Historic Landmark Village)             |
| Elizabeth | Loyalty Road                | Rural setting for animals and farming + views of mountains and clear streams                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | These transmission lines go right through the valley where snow geese migrate every fall and spring. This will be disastrous for wildlife and nature.                                            |
| BT        | Waterford/Lovettsville line | Picturesque, approachable nature. We have horses and farm animals. We love                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | They would destroy the scenery and the views from our homes.                                                                                                                                     |

|     |                                              |                                                                           |                                                                                |
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|     |                                              | the connection with history and the farm life.                            | They would interrupt the historic flow. They would hurt property values.       |
| Jay | Purcellville Road,<br>Hillsboro, VA<br>20132 | The vistas, the gravel roads, hiking and biking local trails with my dog. | It would greatly diminish my enjoyment of living and working in rural Loudoun. |



***The U.S. Urgently Needs a Bigger Grid. Here's a Fast Solution.***

*Brad Plumer, New York Times, 9 April 2024, "The U.S. Urgently Needs a Bigger Grid. Here's a Fast Solution."*

"One of the biggest obstacles to expanding clean energy in the United States is a lack of power lines. Building new transmission lines can take a decade or more because of permitting delays and local opposition. But there may be a faster, cheaper solution, [according to two reports released Tuesday](#)."

["https://www.nytimes.com/2024/04/09/climate/electric-grid-more-power.html?smid=url-share"](https://www.nytimes.com/2024/04/09/climate/electric-grid-more-power.html?smid=url-share)

## Key Legal References

### Virginia Code § 56-46.1.

Commission to consider environmental, economic and improvements in service reliability factors in approving construction of electrical utility facilities; approval required for construction of certain electrical transmission lines; notice and hearings.

A. Whenever the Commission is required to approve the construction of any electrical utility facility, it shall give consideration to the effect of that facility on the environment and establish such conditions as may be desirable or necessary to minimize adverse environmental impact. In order to avoid duplication of governmental activities, any valid permit or approval required for an electric generating plant and associated facilities issued or granted by a federal, state or local governmental entity charged by law with responsibility for issuing permits or approvals regulating environmental impact and mitigation of adverse environmental impact or for other specific public interest issues such as building codes, transportation plans, and public safety, whether such permit or approval is granted prior to or after the Commission's decision, shall be deemed to satisfy the requirements of this section with respect to all matters that (i) are governed by the permit or approval or (ii) are within the authority of, and were considered by, the governmental entity in issuing such permit or approval, and the Commission shall impose no additional conditions with respect to such matters. Nothing in this section shall affect the ability of the Commission to keep the record of a case open. Nothing in this section shall affect any right to appeal such permits or approvals in accordance with applicable law. In the case of a proposed facility located in a region that was designated as of July 1, 2001, as serious nonattainment for the one-hour ozone standard as set forth in the federal Clean Air Act, the Commission shall not issue a decision approving such proposed facility that is conditioned upon issuance of any environmental permit or approval. In every proceeding under this subsection, the Commission shall receive and give consideration to all reports that relate to the proposed facility by state agencies concerned with environmental protection; and if requested by any county or municipality in which the facility is proposed to be built, to local comprehensive plans that have been adopted pursuant to Article 3 (§ 15.2-2223 et seq.) of Chapter 22 of Title 15.2. Additionally, the Commission (a) shall consider the effect of the proposed facility on economic development within the Commonwealth, including but not limited to furtherance of the economic and job creation objectives of the Commonwealth Clean Energy Policy set forth in § 45.2-1706.1, and (b) shall consider any improvements in service reliability that may result from the construction of such facility.

B. Subject to the provisions of subsection J, no electrical transmission line of 138 kilovolts or more shall be constructed unless the State Corporation Commission shall, after at least 30 days' advance notice by (i) publication in a newspaper or newspapers of general circulation in the counties and municipalities through which the line is proposed to be built, (ii) written notice to the governing body of each such county and municipality, and (iii) causing to be sent a copy of the notice by first class mail to all owners of property within the route of the

proposed line, as indicated on the map or sketch of the route filed with the Commission, which requirement shall be satisfied by mailing the notice to such persons at such addresses as are indicated in the land books maintained by the commissioner of revenue, director of finance or treasurer of the county or municipality, approve such line. Such notices shall include a written description of the proposed route the line is to follow, as well as a map or sketch of the route including a digital geographic information system (GIS) map provided by the public utility showing the location of the proposed route. The Commission shall make GIS maps provided under this subsection available to the public on the Commission's website. Such notices shall be in addition to the advance notice to the chief administrative officer of the county or municipality required pursuant to § 15.2-2202.

As a condition to approval the Commission shall determine that the line is needed and that the corridor or route chosen for the line will avoid or reasonably minimize adverse impact to the greatest extent reasonably practicable on the scenic assets, historic resources recorded with the Department of Historic Resources, and environment of the area concerned. To assist the Commission in this determination, as part of the application for Commission approval of the line, the applicant shall summarize its efforts to avoid or reasonably minimize adverse impact to the greatest extent reasonably practicable on the scenic assets, historic resources recorded with the Department of Historic Resources, and environment of the area concerned. In making the determinations about need, corridor or route, and method of installation, the Commission shall verify the applicant's load flow modeling, contingency analyses, and reliability needs presented to justify the new line and its proposed method of installation. If the local comprehensive plan of an affected county or municipality designates corridors or routes for electric transmission lines and the line is proposed to be constructed outside such corridors or routes, in any hearing the county or municipality may provide adequate evidence that the existing planned corridors or routes designated in the plan can adequately serve the needs of the company. Additionally, the Commission shall consider, upon the request of the governing body of any county or municipality in which the line is proposed to be constructed, (a) the costs and economic benefits likely to result from requiring the underground placement of the line and (b) any potential impediments to timely construction of the line.

C. If, prior to such approval, any interested party shall request a public hearing, the Commission shall, as soon as reasonably practicable after such request, hold such hearing or hearings at such place as may be designated by the Commission. In any hearing the public service company shall provide adequate evidence that existing rights-of-way cannot adequately serve the needs of the company.

If, prior to such approval, written requests therefor are received from the governing body of any county or municipality through which the line is proposed to be built or from 20 or more interested parties, the Commission shall hold at least one hearing in the area that would be affected by construction of the line, for the purpose of receiving public comment on the proposal. If any hearing is to be held in the area affected, the Commission shall direct that a copy of the transcripts of any previous hearings held in the case be made available for public inspection at a convenient location in the area for a reasonable time before such local hearing.

D. As used in this section, unless the context requires a different meaning:

"Environment" or "environmental" shall be deemed to include in meaning "historic," as well as a consideration of the probable effects of the line on the health and safety of the persons in the area concerned.

"Interested parties" shall include the governing bodies of any counties or municipalities through which the line is proposed to be built, and persons residing or owning property in each such county or municipality.

"Public utility" means a public utility as defined in § 56-265.1.

"Qualifying facilities" means a cogeneration or small power production facility which meets the criteria of 18 C.F.R. Part 292.

"Reasonably accommodate requests to wheel or transmit power" means:

1. That the applicant will make available to new electric generation facilities constructed after January 9, 1991, qualifying facilities and other nonutilities, a minimum of one-fourth of the total megawatts of the additional transmission capacity created by the proposed line, for the purpose of wheeling to public utility purchasers the power generated by such qualifying facilities and other nonutility facilities which are awarded a power purchase contract by a public utility purchaser in compliance with applicable state law or regulations governing bidding or capacity acquisition programs for the purchase of electric capacity from nonutility sources, provided that the obligation of the applicant will extend only to those requests for wheeling service made within the 12 months following certification by the State Corporation Commission of the transmission line and with effective dates for commencement of such service within the 12 months following completion of the transmission line; and

2. That the wheeling service offered by the applicant, pursuant to subdivision D 1, will reasonably further the purposes of the Public Utilities Regulatory Policies Act of 1978 (P. L. 95-617), as demonstrated by submitting to the Commission, with its application for approval of the line, the cost methodologies, terms, conditions, and dispatch and interconnection requirements the applicant intends, subject to any applicable requirements of the Federal Energy Regulatory Commission, to include in its agreements for such wheeling service.

E. In the event that, at any time after the giving of the notice required in subsection B, it appears to the Commission that consideration of a route or routes significantly different from the route described in the notice is desirable, the Commission shall cause notice of the new route or routes to be published and mailed in accordance with subsection B. The Commission shall thereafter comply with the provisions of this section with respect to the new route or routes to the full extent necessary to give affected localities and interested parties in the newly affected areas the same protection afforded to affected localities and interested parties affected by the route described in the original notice.

F. Approval of a transmission line pursuant to this section shall be deemed to satisfy the requirements of § 15.2-2232 and local zoning ordinances with respect to such transmission line.

G. The Commission shall enter into a memorandum of agreement with the Department of Environmental Quality regarding the coordination of their reviews of the environmental impact of electric generating plants and associated facilities.

H. An applicant that is required to obtain (i) a certificate of public convenience and necessity from the Commission for any electric generating facility, electric transmission line, natural or manufactured gas transmission line as defined in 49 Code of Federal Regulations § 192.3, or natural or manufactured gas storage facility (hereafter, an energy facility) and (ii) an environmental permit for the energy facility that is subject to issuance by any agency or board within the Secretariat of Natural and Historic Resources, may request a pre-application planning and review process. In any such request to the Commission or the Secretariat of Natural and Historic Resources, the applicant shall identify the proposed energy facility for which it requests the pre-application planning and review process. The Commission, the Department of Environmental Quality, the Marine Resources Commission, the Department of Wildlife Resources, the Department of Historic Resources, the Department of Conservation and Recreation, and other appropriate agencies of the Commonwealth shall participate in the pre-application planning and review process. Participation in such process shall not limit the authority otherwise provided by law to the Commission or other agencies or boards of the Commonwealth. The Commission and other participating agencies of the Commonwealth may invite federal and local governmental entities charged by law with responsibility for issuing permits or approvals to participate in the pre-application planning and review process. Through the pre-application planning and review process, the applicant, the Commission, and other agencies and boards shall identify the potential impacts and approvals that may be required and shall develop a plan that will provide for an efficient and coordinated review of the proposed energy facility. The plan shall include (a) a list of the permits or other approvals likely to be required based on the information available, (b) a specific plan and preliminary schedule for the different reviews, (c) a plan for coordinating those reviews and the related public comment process, and (d) designation of points of contact, either within each agency or for the Commonwealth as a whole, to facilitate this coordination. The plan shall be made readily available to the public and shall be maintained on a dedicated website to provide current information on the status of each component of the plan and each approval process including opportunities for public comment.

I. The provisions of this section shall not apply to the construction and operation of a small renewable energy project, as defined in § 10.1-1197.5, by a utility regulated pursuant to this title for which the Department of Environmental Quality has issued a permit by rule pursuant to Article 5 (§ 10.1-1197.5 et seq.) of Chapter 11.1 of Title 10.1.

J. Approval under this section shall not be required for any transmission line for which a certificate of public convenience and necessity is not required pursuant to subdivision A of § 56-265.2.

1972, c. 652; 1973, c. 307; 1974, c. 498; 1983, c. 438; 1984, cc. 287, 562; 1985, c. 282; 1991, cc. 90, 148; 1996, c. 254; 2001, c. 758; 2002, c. 483; 2007, cc. 756, 761, 776, 825; 2009, cc. 808, 854; 2011, cc. 236, 243; 2012, cc. 54, 284; 2016, cc. 192, 276; 2020, cc. 450, 958; 2021, Sp. Sess. I, c. 327.

The chapters of the acts of assembly referenced in the historical citation at the end of this section may not constitute a comprehensive list of such chapters and may exclude chapters whose provisions



C. Prior to acquiring any easement of right-of-way, public service corporations will consider the feasibility of locating such facilities on, over, or under existing easements of rights-of-way. In the event any public service corporation owning a right-of-way shall deny a request of any other public service corporation for joint use of that right-of-way, the corporation whose request is denied shall have the right, within thirty days after the denial to apply to the Commission for an order requiring such joint use. The Commission shall conduct a hearing on such application and shall direct the corporation owning the right-of-way to allow joint use if the Commission finds that such joint use is reasonable and that the present or future public utility service of such corporation will not be adversely affected by such joint use. In making such determination, the Commission may establish the terms and conditions for such joint use, including, without limitation, a requirement of compensation by the utility making the request to the utility owning the right-of-way, if the Commission finds such a requirement to be appropriate.

<https://law.lis.virginia.gov/vacode/title56/chapter1/section56-46.1/>

### **The Open Space Land Act**

Va. Code Ann. § 10.1-1700 through 10.1-1705.1 Enacted by the General Assembly in 1966.

1966 Acts of Assembly, Chapter 461: “the provision and preservation of permanent open-space land are necessary to help curb urban sprawl, to prevent the spread of urban blight and deterioration, to encourage and assist more economic and desirable urban development, to help provide or preserve necessary park, recreational, historic and scenic areas, and to conserve land and other natural resources”

In 1966 the General Assembly also created the Virginia Outdoors Foundation and the Virginia Landmarks Commission/Board of Historic Resources. Pre-dates federal environmental laws such as NEPA, CWA, CAA, ESA, etc. as well as the Uniform Conservation Easement Act.

### **The Conservation Easement Act**

Va. Code Ann. § 10.1-1009 through 10.1-1016 Enacted by the General Assembly in 1988. Based on the Uniform Conservation Easement Act (with some significant modifications). Primarily for non-profit “holders,” but see Va. Code § 10.1-1016, which allows public bodies to hold conservation easements).