

In accordance with the Code of Virginia, Prince William County requests that the State Corporation Commission give consideration to the Prince William County Comprehensive Plan in reviewing proposals to construct the Haymarket 230 kV Double Circuit Transmission Line. To be clear, the only alternative consistent with the Comprehensive Plan is the I-66 Hybrid alternative, which would place the line underground from just west of the interchange of Rt. 29 and I-66 to the proposed Haymarket Substation. This alternative minimizes the impact of the line on existing residential neighborhoods, numerous historic resources, two scenic byways, a wildlife trail, and the character of the County's Rural Area.

The Comprehensive Plan designates Corridors or Routes for Electric Transmission Lines of 150 Kilovolts or More. The Plan illustrates the location of existing electric transmission lines and designates the corridors that all future transmission lines should follow. None of the proposed routes are within corridors designated within the Comprehensive Plan. As such, Dominion's proposal and the alternatives that they have selected deserve a higher level of scrutiny for consistency with the Comprehensive Plan.

The proposed route (I-66 Overhead) impacts the Route 15 Journey Through Hallowed Ground and Route 55 Heritage Corridors. These are also designated scenic by-ways. Heritage Corridors are identified in the Parks, Open Space and Trails chapter of the Comprehensive Plan as linear swaths of land that connect or contain resources of cultural significance and may contain trails and/or roadways with interpretive signage linking cultural sites are part of a countywide system of continuous open space corridors. The corridors may be historic routes themselves, or modern routes that connect sites of cultural interest. The Corridors Goal is to identify, protect and preserve environmental, heritage and recreational corridors. As with all other elements previously noted, the I-66 Hybrid is the only alternative that minimizes impacts to these heritage corridors.

In addition to the land use and infrastructure elements of the Comprehensive Plan, we have also adopted Community Design goals as part of the Plan to guide development within the County. One of the Plan's goals is to provide quality development and a quality visual environment throughout Prince William County for residents, businesses, and visitors. Key policies and strategies within the Community Design Plan include:

- Encourage site, architectural, signage, and landscape designs that complement the scale and character of existing and planned development in the Development Area and in the Rural Area.
- Encourage the development of well-functioning residential and commercial areas, and the improvement and enhancement of existing residential and commercial areas.
- Encourages consolidation, undergrounding, or relocation of overhead utilities to minimize negative visual impacts.

- Encourage site plans and building designs for new development that enhance the settings of the County Registered Historic Sites, as identified in the Cultural Resources Plan.
- Design projects to mitigate the adverse effects of development on the architectural and landscape features of archaeological and historic sites and structures when developing properties or adjacent properties.
- Encourage the preservation of views to and from historic properties through the protection of farm fields, meadows, and woodlands.

Finally, the Comprehensive Plan states that “All proposed public facilities shall be planned, sited, and buffered in a manner so as to provide compatibility with surrounding existing and planned uses. Development proposed under such public facility determination shall adhere to the policies and action strategies of the Community Design Plan.” All of the proposed alternatives, except the I-66 Hybrid alternative, have significant visual impact on existing and planned uses, particularly residential neighborhoods, historic resources and the County’s Rural Area.

Clearly, the Community Design Plan indicates that undergrounding utilities is not only a community preference, but also a crucial goal of the Plan and again, the only alternative consistent with the Comprehensive Plan is the I-66 Hybrid Alternative.

In conclusion, the Code of Virginia directs the State Corporation Commission to consider a locality’s comprehensive plan in its decision-making and the only alternative consistent with the goals, policies and action strategies of the Prince William County Comprehensive Plan is the I-66 Hybrid alternative.