



2024 Shoreline Management Plan Revision Recommendations and Summary Report

December 12, 2023

TLAC BOARD OF DIRECTORS 2023

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INTRODUCTION and BACKGROUND

As the governmental organization representing the counties on Smith Mountain and Leesville Lakes, the Tri-County Lakes Administrative Commission (TLAC) is committed to serve as the conduit for citizens to suggest revisions of specific requirements of the Shoreline Management Plan (SMP) in the 2024 revision by Appalachian Power Company (APCO). TLAC organized and conducted a series of seven (7) targeted roundtable meetings with property owners and business leaders in the Smith Mountain Lake and Leesville Lake communities beginning July 10, 2023, and ending on October 12, 2023. These roundtables were conducted as open forums where residents and business leaders contributed their suggestions based upon their experiences working with APCO to comply with the SMP primarily for the building or modification of structures along the shorelines of the Smith Mountain Project. Additionally, two (2) citizens submitted suggestions to TLAC individually via email. Those submissions are noted as "Individual".

In addition to suggestions for SMP revisions, participants shared experiences and made recommendations for operational improvements to the permitting process. These are included in this report for submission to APCO and FERC.

The schedule of roundtable meetings is presented in the table below.

| Date/Time | Group | Location | Number of Participants |
|-----------------------------------|--|---------------------------|-------------------------------|
| Jul. 10, 4:00PM | Marina Owners (SML) | TLAC Office | 4 |
| Jul. 19, 4:00PM | Realtors/Brokers (SML) | TLAC Office | 2 |
| Jul. 24, 5:30PM | Builders & Developers | TLAC Office | 3 |
| Aug. 14, 6:00PM | Dock Builders, Dredgers & Shoreline Stabilization (SML) | TLAC Office | 5 |
| Aug. 31, 6:00PM | Community: Smith Mountain Lake (HOA's POA's & Private property owners) | Eastlake Community Church | 75 |
| Sept. 11, 4:00PM | Community Smith Mountain Lake Association (SMLA) Board & Membership | Trinity Ecumenical Parish | 60 |
| Oct. 12, 4:00PM | Community Leesville Lake | Altavista Train Station | 20 |
| TOTAL ROUNDTABLE ATTENDEES | | | 169 |
| ----- | Individual written submissions | Email | 3 |
| ----- | Smith Mountain Lake Association | Email | N/A |

TLAC REQUESTED REVISIONS TO THE SHORELINE MANAGEMENT PLAN

Based upon stakeholder feedback and after due consideration of the intent of the APCO Shoreline Management Plan (SMP), the TLAC Board of Directors has taken the opportunity to request APCO's and FERC's attention and action to improve the SMP and is formally recommending the following revisions to the SMP in 2024.

- 1) Add "Buffer Garden" to the glossary.
- 2) Provide onsite technical consultation and advice at the pre-application stage if the involved property owner(s) request.
- 3) Permits:
 - a. Reduce the timing from permit application to permit approval.
 - b. Set timelines for the progression of permits throughout the APCO SMP program.
 - c. Establish a process to issue permit status letters within 30 calendar days after submission.
 - d. Provide status reports at each stage of permit approval to facilitate continued progress. (currently process time is up to 2-years)
 - e. Extend the time allowed from permit approval to project commencement/completion to accommodate for unavoidable time constraints of contractors.
 - f. Eliminate the requirement for county permits when the county does not require the permit.
- 4) Provide a reasonable timeframe from the issuance of a dock status letter to the deadline for changes and inspection.
- 5) Develop and utilize timeframe parameters to project lead times up to a closing date.
- 6) Minimize the number of surveys required and eliminate the underwater survey requirement to reduce the expense of the permit process.
- 7) Commercial Businesses:
 - a. Afford due consideration to the implementation and enforcement of lakefront marinas and businesses so as not to adversely impact their ability to sustain and grow their businesses.
 - b. Revise the 33' height limitation for commercial dry rack storage to allow a case-by-case evaluation and determination of the height depending upon the location.
- 8) Dock Parameters:
 - a. Allow dock offsets to be determined by survey. Then permit a dock that fits the area regardless of the orientation of the roofline or the shape of the dock.
 - b. Write the dock regulations to state total square feet allowed and let the property owner determine how they prefer to allocate the use of the square footage for the boat slip and storage without dictating maximum square footage for any specific use.
 - c. Clearly detail that the number of boat slips in the dock is limited to two (2), and clearly state that jet ski lifts are only allowable over the walkway.
 - d. Allow upgrades and changes that do not change the footprint of the dock such as the addition of railings or replacement of a pole, without requiring a permit.

9) Walkway Regulations:

- a. Eliminate limitations on impervious space since walkways impact minimal area within the Project boundary.
- b. Amend regulations to accommodate ADA compliance allowing paving of walkways/paths
- c. Remove the limitation on walkway and step width allowances. Require only the minimum requirement in the Americans with Disabilities Act (ADA).

10) Buffer Garden/Vegetation Regulations:

- a. Do not require in-water plantings as they can infringe upon docks and beaches and may become invasive.
- b. Clarify when a permit is or is not required for installation of vegetation.
- c. Revise current vegetation regulations to make them more realistic.
- d. Refrain from using current vegetation regulations in a punitive manner.
- e. Revise Vegetative Cover Regulations to recognize seasonal advantages and accommodate those advantages when determining the timeframe of planting permits. Plantings in the dead of winter and mid-summer are not successful.
- f. Thoroughly review vegetative replacement requirements for appropriateness.
- g. Clarify when landscape plans are required and when they are not required.

11) Buffer Garden Plants:

- a. Cite the Flora of VA database, used by the Virginia Conservation Assistance Program (VCAP) for native plant recommendations.
- b. Allow one for one replacement of plants for those that die after installation.
- c. Improve buffer vegetation suggestions to include a list of deer-resistant vegetation, cost effective vegetation, and visually pleasing vegetation.

12) Expand the appeals process, 3.3, to be a small review council to include equal representation of: AEP (jurisdiction of the shoreline); the TLAC (jurisdiction of properties adjacent to or affected by the SMP); and the DWR (jurisdiction of the lake). This would ensure an equal and fair public/private consideration of issues at hand in cases that are subject to appeals. The review council should develop recommendations in every appeal case.

13) Create a small review council to manage the appeals process to include APCO, TLAC and DWR to develop recommendations in every appeal case.

14) Reestablish local APCO office hours for consultation with permit applicants and shoreline property owners.

SUMMARY

The TLAC Board of Directors appreciates and acknowledges the distinct opportunity to provide community-based feedback to APCO and FERC. We clearly acknowledge the inherent responsibilities that APCO has as the Licensee under FERC regulations. It has been the Board's intention to evaluate and report feedback objectively and thoroughly in an effort to demonstrate a collective response to review of the SMP.

Throughout the SMP roundtable process, there were common themes that became apparent. Many participants recognized the importance of the SMP to regulate activities on the shorelines of Smith Mountain Lake and Leesville Lake. The value of protecting the shoreline through regulation was broadly supported. However, there were significant operational observations and complaints regarding delays in the processing of applications. As an example, after submitting a permit application, many waited weeks, some waited months, and a few years, to receive acknowledgement or guidance as to next steps. The delayed response time to inquiries and requests from the Shoreline Management Division of APCO was often cited as well.

The primary purpose of the SMP is stated as, "...to provide guidelines and regulations for shoreline development for Smith Mountain Lake and Leesville Lake. The SMP must also ensure the protection and enhancement of the Project's recreational, environmental, cultural, or scenic resources and the Project's primary function, which is the production of electricity." In every roundtable discussion, property owners expressed frustration that there is overreach in requirements that do not fit the purpose of the SMP.

Roundtable participants reported experiences wherein perceived 'punitive' requirements were applied that could not be found in the SMP such as requiring in-water plantings or replacement of walkway components with other materials. In some cases, permittees received conflicting information from different APCO staff. It was unclear whether this was due to interpretive differences or arbitrary determination of the regulation to apply to the specific permit.

There are opportunities to eliminate unnecessary requirements, increase communication, and increase responsiveness to property owners through revision of the SMP. Additionally, more consistent application of remediation requirements will greatly improve the public's perception of APCO and decrease frustration levels with SMP regulations. By taking the concerns of property owners into consideration going forward with SMP revisions, APCO will potentially develop a more concise and effective SMP while simultaneously improving relations with property owners.

We believe there are opportunities wherein APCO should review the SMP through the lens of choosing those things that are fundamentally important to managing the Project and staying true to its mission, then perhaps marginalizing if not dismissing those things that have become unreasonable, burdensome and hard to defend to property owners. In some cases common sense is non-existent. We desire appropriate regulation and protections but do not support over-regulation. A fresh look and perspective is critically needed.

It is the Board's hope that this year-long process and subsequent report will be positively accepted and recommendations strongly considered as we all seek to improve upon and sustain Smith Mountain Lake harmoniously and collectively.

The TLAC Board of Directors and our lake communities wish to express sincere appreciation for the opportunity to be heard and participate in this most important process. We look forward to personally presenting this report and following the process for successful outcomes in 2024.

Kindest regards,

Lorie M. Smith, Chairman

TLAC Board of Directors

APPENDIX A

ROUNDTABLE PARTICIPANTS - CONCERNS AND REVISIONS REQUESTED

- 1) Add "Buffer Garden" to the glossary, Definition: A lakefront buffer garden is an area of vegetation created near the lakeshore to slow runoff and to trap sediment, excess nutrients, and other pollutants. A landscape buffer serves as a protective area between the lake and human activity such as housing development or agriculture. (SMLA)
 - [Glossary, p. iv](#)
- 2) Revise the 33' height limitation for dry rack storage. It is constrictive and should be evaluated on a case-by-case basis depending upon the location of the rack storage (Marina Owners)
 - [SMP 2.5.1 p. 20, #14 High Density Commercial Regulations](#)
- 3) Allow dock offsets to be determined by survey. Then build any shape dock that fits the area regardless of the direction of the roofline (Dock Builders, Community Roundtable)
 - [SMP 2.5.1, p. 21, #2 High Density Commercial Regulations](#)
 - [SMP 2.5.2, p. 27, #24 High Density Multi-Use Regulations](#)
 - [SMP 2.5.2, p. 30, #20 High Density Multi-Use Regulations](#)
 - [SMP 2.5.3, p. 34, #20 Public Use Regulations, Multi-slip docks](#)
 - [SMP 2.5.3, p. 37, #19 Public Use Regulations, Courtesy pier and ramp](#)
- 4) Eliminate or revise 1/3 cove rule (Marina Owners, Dock Builders/Shoreline Stabilization, Builders and Developers)
 - [SMP 2.5.1, p. 19, #8 High Density Commercial Regulations](#)
 - [SMP 2.5.2, p. 24, #7 High Density Multi-Use Regulations](#)
 - [SMP 2.5.3, p. 32, #8 Public Use Regulations, Multi-slip docks](#)
 - [SMP 2.5.3, p. 36, #8 Public Use Regulations, Courtesy pier and ramp](#)
 - [SMP 2.5.4, p. 39, #7 Low-Density Use Regulations, Low Density Single Family Residential](#)
 - [SMP 2.5.4, p. 43, #7 Low-Density Multi-Use Regulations](#)
 - [SMP 2.5.4, p. 48, #8 Low-Density Commercial](#)
 - [SMP 2.5.4, p. 52, #8 Low-Density Public Use, Multi-slip Docks](#)
 - [SMP 2.5.4, p. 55, #6 Low-Density Public Use, Courtesy Pier](#)
 - [SMP 2.5.6, p. 62, #7 Island Protection Regulations](#)
- 5) Write the dock regulations to state square feet allowed and let the property owner determine how they prefer to allocate the use of the square footage for the boat slip and storage without dictating maximum square footage for any specific use. (Community Roundtable)
 - [SMP 2.5.4 p. 39, #9 Low-Density Use Regulations, Low Density Single Family Residential](#)
 - [SMP 2.5.4 p. 40, #16 Low-Density Use Regulations, Low Density Single Family Residential](#)
 - [SMP 2.5.4 p. 44, #12 Low Density Multi-Use Regulations](#)
 - [SMP 2.5.4 p. 48, #13 Low-Density Commercial](#)

- 6) Reorganize the sections of the SMP that address dock permits. Many parameters apply to all docks. A better organization of the requirements may be to start with common items that apply to all, and then list specific use restrictions. (SMLA)
 - [SMP 2.4, p. 16 Shoreline Classification Parameters](#)
- 7) Consider removing the requirement for an adjacent functioning restroom for a dock of 3 or more slips. It may not be relevant? (SMLA)
 - [SMP 2.5.4, p. 39, #9 Low-Density Use Regulations](#)
- 8) Remove the limitation on walkway and step width allowances. (Marina Owners, Realtors)
 - [SMP 2.5.4, p. 39, #9 Low-Density Use Regulations](#)
 - [SMP 2.5.4, p. 39, #10 Low-Density Use Regulations](#)
 - [SMP 2.5.4, p. 45, #17 Low-Density Use Regulations](#)
- 9) Clearly detail that the number of boat slips in the dock is limited to two (2), and clearly state that jet ski lifts are only allowable over the walkway. Regardless of the amount of shoreline, permits for multiple slips are sometimes denied. (Community Roundtable)
 - [SMP 2.5.4, p. 39, #9 Low-Density Use Regulations](#)
 - [SMP 2.5.4, p. 42, #23 Low-Density Use Regulations](#)
- 10) Revise regulations to recommend limiting the amount of shoreline that can be stripped of vegetation to a specified number of feet on either side of a proposed dock rather than requiring replacement of vegetation when installing a dock. Buffer gardens should be prepared for these areas in lieu of Section 2.5.12. (SMLA)
 - [SMP 2.5.4, p. 42, #29 Low-Density Use Regulations](#)
 - [SMP 2.5.4, p. 47, #27 Low-Density Multiple Use](#)
- 11) Eliminate the recommendation for plants rather than rip rap for shoreline stabilization. It is ineffective, and at an APCO demonstration site at Leesville Lake in 2015 all of the plants died. (Leesville Lake Roundtable)
 - [SMP 2.5.9, p. 66 Shoreline Stabilization Restrictions](#)
- 12) Discourage use of filter cloth for buffer gardens as it encourages weed growth. It should only be used when installing rip rap after removing vegetation. This distinction is not clear. (SMLA)
 - [SMP 2.5.9, p. 70, #11 Shoreline Stabilization Restrictions](#)
- 13) Mandate shoreline buffer gardens and/or retention of natural buffer for all new construction. (SMLA)
 - [SMP 2.5.9, p. 70, #11 Shoreline Stabilization Restrictions](#)
- 14) Revise the Shoreline Stabilization Restrictions which have given homeowners the opportunity to completely open their shorelines. This is counterproductive to reducing erosion and limiting fertilizers, pollutants, and sediments from entering the lake which has caused significant nutrient loading. (SMLA)
 - [SMP 2.5.9, p. 70, #12 Shoreline Stabilization Restrictions](#)
- 15) Remove redundancy of regulating by both the Army Corps of Engineers (ACOE) and APCO. This would eliminate duplication of paperwork and approvals. Dredging only needs to be regulated by the ACOE. (Marina Owners)
 - [SMP 2.5.9 p. 70, #3-#4 Shoreline Stabilization Restrictions](#)
 - [SMP 2.5.10 p. 71, #1 Dredging and/or Excavation Restrictions](#)
 - [SMP 2.5.10 p. 72, #2 Dredging and/or Excavation Restrictions](#)

- 16) Revise current vegetation regulations to make them more realistic. (Community Roundtable, SMLA Membership)
 - [2.5.12, Page 73 Vegetative Cover Restrictions](#)
 - [2.5.12-1.0, p. 76, Table 2.5-2 Vegetation Replacement Rates](#)
- 17) Refrain from using current vegetation regulations in a punitive manner. (Builders and Developers, SMLA Membership)
 - [2.5.12, p. 74 Vegetative Cover Restrictions](#)
 - [3.5, p. 90 Monitoring and Enforcement Procedures](#)
- 18) Revise Vegetative Cover Regulations to recognize seasonal advantages and accommodate those advantages when determining the timeframe of planting permits. Plantings in the dead of winter and mid-summer are not successful. (Community Roundtable, SMLA Membership Roundtable)
 - [SMP 2.5.12, p. 73 Vegetative Cover Regulations](#)
- 19) Add “Buffer” to the glossary. (SMLA)
 - [SMP 2.5.12, p. 74 Vegetative Cover Regulations](#)
- 20) Add the sentence: All new construction properties must include a shoreline buffer garden either native or natural. (SMLA)
 - [SMP 2.5.12, p. 74 Vegetative Cover Regulations](#)
- 21) Modify vegetation replacement criteria to focus on native vegetation as a replacement for removed vegetation. Current APCO direction leads homeowners to believe they must replace each size vegetation removed with similar size vegetation. Native vegetation in a buffer is better. (SMLA)
 - [SMP 2.5.12, p. 74 Vegetative Cover Regulations](#)
- 22) Clarify the requirement of landscape plans that are only required under a vegetation removal permit. Some residents do not want to plant below the 800' mark and if they do, they are confused about use of native vs non-native. (SMLA)
 - [SMP 2.5.12, p. 74 Vegetative Cover Regulations](#)
- 23) Insert a comment that states, “Homeowners may establish a vegetative buffer without a permit if vegetation has not been removed under a vegetation removal permit.” (SMLA)
 - [SMP 2.5.12, p. 75 Vegetative Cover Regulations](#)
- 24) Reduce restrictions for establishing a viewshed. (Builders and Developers)
 - [SMP 2.5.12, p. 75, #1 Vegetative Cover Regulations](#)
- 25) The SMP should not dictate limitations on impervious space since walkways impact minimal area within the Project boundary – more latitude is needed. (Realtors)
 - [SMP 2.5.12, p. 77, #2 Vegetative Cover Regulations](#)
- 26) There is some confusion on the native plant lists. Citing the [Flora of VA](#) database, used by the Virginia Conservation Assistance Program (VCAP), would be beneficial. VCAP has similar requirements as APCO. The native plant list should be the same. (SMLA)
 - [SMP 2.5.12, p. 77 Vegetative Cover Regulations](#)
- 27) Other than the cost of installing a buffer garden, the biggest deterrent to planting a buffer is that plants die off. Replacement of plants should be allowed without a permit. Allowing one for one replacement for items that die off may be a simple solution. (SMLA)
 - [SMP 2.5.12, p. 77 Vegetative Cover Regulations](#)

- 28) Amend regulations to accommodate ADA compliance allowing paving of walkways/paths (Marina Owners)
- [SMP 2.5.12 p. 77-#2 Vegetative Cover Regulations](#)
- 29) Add the [Flora of Virginia](#) reference. The current lists that are referenced are inconsistent and incomplete. They sometimes cause confusion and unnecessary purchases. (SMLA)
- [SMP 2.5.12, p. 78 Vegetative Cover Regulations](#)
- 30) Clarify what is meant by stating applicants will be required to mitigate for the removal of woody debris from the lake. (SMLA)
- [SMP 2.5.13, p. 78 Woody Debris Regulations](#)
- 31) Clarify what is meant by the caveat that removal of floating debris and litter do not require Appalachian's approval as long as the method of removal complies with other requirements of the plan (SMLA)
- [SMP 2.5.14, p. 78 Floating Material Regulations](#)
- 32) Allow upgrades and changes that do not change the footprint of the dock such as the addition of railings or replacement of a pole, without requiring a permit. Such as: (Marina Owners)
- [SMP 2.7, p. 82 b., #ii Maintenance of a Non-Dangerous Structure](#)
- 33) Current vegetation regulations are unrealistic and punitive (Community Roundtable)
- [SMP 3.5, p. 91 Monitoring and Enforcement Procedures](#)
- 34) Not sure why this paragraph is relevant and located here. Is it a required reference/statement? (SMLA)
- [SMP 3.5, p. 92 Monitoring and Enforcement Procedures \(The status of VDEQ's Section 401 Water Quality Certification may change at any time,...\)](#)
- 35) Recommended plants are not "deer-resistant"; vegetation planted was wiped out 3x by deer (Community Roundtable)
- [SMP Appendix F, Native Plant List](#)
- 36) More common-sense solutions for buffer vegetation are needed that would serve as a filter, be cost effective, and be visually pleasing. (Community Roundtable)
- [SMP Appendix F, Native Plant List](#)
- 37) Why does the APCO permit require approved county permits when the county states no permit is needed?
- [2.7a, \(ix\) p. 82 Replacement of Destroyed or Damaged Structures; Application, p. 3; NOTE: TLAC confirmed with Franklin County Building and Planning that the county permits are required because the counties conduct the inspections.](#)

APPENDIX B

ROUNDTABLE PARTICIPANTS – OPERATIONAL/PROCEDURAL REQUESTS/GENERAL

- 1) Provide onsite technical consultation and advice at the pre-application stage at the property owner(s) request. (Individual)
- 2) Orient APCO employees to work to assist and serve shoreline property owners in a collaborative manner.
- 3) Renew permits that are in compliance on an annual basis. (Realtors)
- 4) Provide a reasonable timeframe from the issuance of a dock status letter to the deadline for changes and inspection. (Realtors, Leesville Lake Roundtable)
- 5) Develop and utilize timeframe parameters to project lead times up to a closing date. (SML Realtors)
- 6) Set timelines for the progression of permits through the APCO SMP program. (Community Roundtable, Leesville Lake Roundtable)
- 7) Issue permit status letters within 30 calendar days after submission (Realtors)
- 8) Reduce the timing from permit application to permit approval (Dock Builders/Shoreline Stabilization, Builders and Developers, Leesville Lake)
- 9) Provide status reports at each stage of permit approval to facilitate continued progress. (currently process time is up to 2-years) (SML Realtors, Dock Builders)
- 10) Establish a set timeframe in which permits are approved by default if there is no response from APCO. (Community Roundtable)
- 11) Develop creative solutions such as “inspections via photos” to ensure more timely closings. (Realtors)
- 12) Use electronic signatures to expedite the permitting process. (Community Roundtable)
- 13) Minimize the number of surveys required to reduce the expense of the permit process. (Builders and Developers, Community Roundtable, Leesville Lake Roundtable)
- 14) Eliminate the requirement of an underwater survey for the addition of a jet-ski lift. (Leesville Lake Roundtable)
- 15) Limit the restrictions on commercial businesses on the lake to foster growth for the community and for the tax base. (Marina Owners)
- 16) Apply SMP rules equally. (Marina Owners, Builders and Developers)
- 17) Improve the responsiveness of APCO’s SMP division to telephone and email communications. (Marina Owners, Dock Builders/Shoreline Stabilization, Builders and Developers, Community, SMLA Membership, Leesville Lake Roundtable)
- 18) Establish an APCO representative accessible in person or by telephone to consult with to expedite the application process (Dock Builders/Shoreline Stabilization)
- 19) Extend the time allowed from permit approval to project commencement/completion to accommodate for unavoidable time constraints of contractors. (Dock Builders/Shoreline Stabilization)
- 20) Copy the contractor when issuing a permit to the property owner to expedite the project (Community)
- 21) Approve installation of rip rap promptly. It serves as erosion control, and installation should never be delayed or prohibited. (Dock Builders/Shoreline Stabilization)
- 22) Establish incentives for APCO to be more responsive to permittees. (Builders and Developers)
- 23) Create a committee of homeowners to be a part of the SMP review process. (Community Roundtable)

- 24) Consider expanding Exceptions and Exclusions at 3.4. There may be situations where competing values exceed or compete with those expressed in the SMP. For example, to ameliorate or mitigate an existing hazard. (Individual)
- 25) Expand the appeals process at 3.3 to be a small review council to include equal representation of: AEP (jurisdiction of the shoreline); the TLAC (jurisdiction of properties adjacent to or affected by the SMP); and the DWR (jurisdiction of the lake). This would ensure an equal and fair public/private consideration of issues at hand in all cases that are subject to appeals. The review council should develop recommendations in every appeal case. (Individual)

PROCEDURAL SUGGESTIONS

- 1) Create a council with representatives from Bedford, Franklin, and Pittsylvania and propose to take over the SMP & demonstrate to the FERC that you're overseeing the permits. That will constitute a body that cares for the community.
- 2) Create a small review council to manage the appeals process to include APCO, TLAC and DWR to develop recommendations in every appeal case.
- 3) Consult with civic organizations such as the Chamber, Rotary, Ruritans regarding SMP revisions.
- 4) Communicate all amendments made outside of the review period to the public.
- 5) Establish regular meetings between APCO and the community for regularly scheduled input.
- 6) Organize meetings with a FERC representative(s) at both Smith Mountain Lake and Leesville Lake.
- 7) Establish county involvement in rate increase negotiations to leverage reasonable development and application of SMP regulations.
- 8) Reestablish the counties' authority for permitting lakeshore structures and development. Limit APCO authority to management of the dam and the shoreline with reasonable policies.

GENERAL CONCERNS

- 1) Do not require in-water plantings as they can grow to infringe upon docks and beaches.
- 2) It is unfair that if trees fall in the 800' (SML) 620' (Leesville Lake) they must be replaced.
- 3) The SMP continues to become more and more restrictive.
- 4) Most property owners cannot afford to fight APCO in the legal realm and thus have no option but to comply with dictates of the SMP and the sometimes misapplication or punitive requirements of APCO.