

APPALACHIAN POWER COMPANY
BEFORE THE
VIRGINIA STATE CORPORATION COMMISSION
CASE NO. PUR-2026-00047

APPLICATION FOR APPROVAL AND CERTIFICATION OF
ELECTRICAL TRANSMISSION LINE

Abert – Reusens Transmission Improvements Project

VOLUME 2 OF 3

Siting Study and VDEQ Supplement

May 2026

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REBUILD SITING STUDY FOR ABERT – REUSENS TRANSMISSION IMPROVEMENTS
PROJECT

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Rebuild Siting Study for Abert – Reusens Transmission Improvements Project

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KEY TERMINOLOGY

Constraints	Specific areas that should be avoided to the extent reasonably practical during the route development and site selection process.
Diversion	A minor adjustment to the existing route where no other alternative is considered.
Encroachment	Any structure or activity within an existing right-of-way that could interfere with the safe, reliable operation of transmission facilities is called an encroachment and is prohibited under the terms of a right-of-way.
Endpoints	The Project starting and ending point(s) (“Project Endpoints”), which may include substations, switch stations, tap points, or other locations defined by the Company’s planners and engineers.
Environmental Justice	The fair treatment and meaningful involvement of every person, regardless of race, color, national origin, income, faith, or disability, regarding the development, implementation, or enforcement of any environmental law, regulation, or policy.
Focus Area	Areas along an existing transmission line route where rebuilding may not be feasible due to the presence of constraints and alternative route analysis is necessary.
Land Use	Describes the human use of the land and activities at a given location such as agricultural, residential, industrial, mining, commercial, and recreational uses. It differs from land cover which only describes the physical characteristics.
Opportunity Feature(s)	Areas or existing linear features along which the transmission line may have less disruption to area land uses and the natural and cultural environment.
Project	The proposed transmission facilities studied in the siting report.
Proposed Route	The alignment on which the Siting Team proposes to construct a transmission line. The Proposed Route (1) reasonably minimizes adverse impacts on area land uses and the natural and cultural environment; (2) minimizes special design requirements and unreasonable costs; and (3) can be constructed and operated in a safe, timely, and reliable manner.
Rebuild Route	Rebuilding within or near the existing transmission line right-of-way.
Siting Team	A multidisciplinary team of experts, in transmission line routing, environmental impact assessment, impact mitigation, engineering, construction management, etc., that works together to develop the Project’s transmission line routes.

Study Area	The territory in which line route alternatives can be sited to feasibly meet the Project’s functional requirements and, at the same time, minimize environmental impacts and Project costs.
Study Segments	Study Segments are off-centerline route alignments.
Substation	Substations are facilities that transform bulk electric voltage down to distribution levels and/or provide protection and controls for the transmission electric grid. Typical equipment includes switches, circuit breakers, buses, and transformers.
Transmission Line	An electric line that operates at 69-kilovolts and/or above and has the purpose of moving power from a generation facility to a substation or between substations.

ACRONYMS

ACS	American Community Survey
AEP	American Electric Power
BMPs	Best Management Practices
CBG	Census Block Group
CPCN	Certificate of Public Convenience and Necessity
CWA	Clean Water Act
EJ	Environmental Justice
EPA	U.S. Environmental Protection Agency
ERM	Environmental Resources Management
ESRI	Environmental Systems Research Institute
FCV	Forest Conservation Value
FEMA	Federal Emergency Management Agency
GIS	Geographic Information System
IPaC	Information for Planning and Consultation
JPA	Joint Permit Application
kV	Kilovolt
KOPs	Key Observation Points
LULC	Land Use Land Cover
NAIP	National Agriculture Imagery Program
NHD	National Hydrography Dataset
NHP	National Heritage Program
NHR	National Heritage Resources
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
PEM	Palustrine Emergent Wetlands
PFO	Palustrine Forested Wetlands
PSS	Palustrine Scrub-Shrub Wetlands
ROW	Right-of-way
SCC	State Corporation Commission

T&E	Threatened and Endangered (species)
TOYRs	Time-of-year restrictions
USACE	United States Army Corps of Engineers
USCB	United States Census Bureau
USFWS	U.S. Fish and Wildlife Service
VaFWIS	Fish and Wildlife Information Service
VCRIS	Virginia Cultural Resources Information System
VDCR	Virginia Department of Conservation and Recreation
VDEQ	Virginia Department of Environmental Quality
VDH	Virginia Department of Health
VDHR	Virginia Department of Historic Resources
VDOF	Virginia Department of Forestry
VDOT	Virginia Department of Transportation
VDWR	Virginia Department of Wildlife Resources
VEJA	Virginia Environmental Justice Act
VMRC	Virginia Marine Resources Commission
VOF	Virginia Outdoors Foundation
WERMS	Wildlife Environmental Review Map Service

1.0 INTRODUCTION

American Electric Power (“AEP”) and its affiliated operating company, Appalachian Power Company (“Appalachian Power” or “Company”), are proposing to rebuild a section of the existing Big Island – Reusens 69-kilovolt (“kV”) Transmission Line between the existing Abert and Reusens Substations in Amherst and Bedford Counties and the City of Lynchburg, Virginia. The Abert – Reusens Transmission Improvements Project (the “Project”) involves rebuilding the existing single-circuit transmission line with a higher-capacity 69-kV conductor to improve system performance and ensure compliance. To accommodate the future upgrades, the existing Abert Substation will be upgraded on Company-owned property. The Project is necessary to comply with electric reliability standards and to maintain reliable service in the Company’s Abert Load Area.

The Company’s existing Big Island – Reusens 69-kV Transmission Line was originally constructed in the 1960s with mostly wood H-frame and three-pole structures. The Project will be rebuilt using galvanized steel H-frame, three-pole, and monopole structures. The proposed structure heights are anticipated to range from 65 to 86 feet and will be approximately 20 feet taller than the existing structures.

The Company will seek a Certificate of Public Convenience and Necessity (“CPCN”) from the Virginia State Corporation Commission (“SCC”) to rebuild the existing 69-kV transmission line mostly within the existing 100-foot-wide right-of-way (“ROW”). Final line routes and structure locations will be determined during final engineering and after additional studies are completed, including, but not limited to, ground surveys, geotechnical and environmental studies, and additional interviews with landowners are completed. If approved, the Company will complete the preliminary engineering and work with the affected landowners to update existing easements, as necessary. With the above input, the Company will finalize the proposed structure locations and ROW width within the SCC-approved filing corridor. The Company will also coordinate with the necessary federal, state, and local agencies during the permitting and construction phases of the Project to adhere to all required permits needed.

Based on its preliminary engineering analysis to date, the Company believes that the Proposed Route is the most suitable centerline for the Project. An approximately 100-foot-wide ROW will generally be sited within an approximately 200- to 300-foot-wide SCC filing corridor. However, the Company needs the flexibility to shift the centerline less than 50 feet in either direction in two locations where the Proposed Route deviates slightly from the existing centerline and 50 feet in either direction in one location where the Proposed Route is generally parallel to the existing transmission line on new ROW.

The Company initiated the routing process for the Project in late 2024 with a site review of the existing ROW in January 2025. The Company introduced the Project to local officials from Amherst and Bedford Counties and the City of Lynchburg in July 2025 and requested feedback. The Project was announced to the public and an in-person open house was held in August 2025. Pending issuance of all required federal, state, and/or local permits, construction is expected to begin in 2028 and take approximately one year. The proposed in-service date for the Project is June 1, 2029. See the Outreach Fact Sheet (Attachment A).

This Rebuild Siting Study for the Project (“Siting Study”) describes the route development process for the Project and the rationale for the selection of a proposed route.

2.0 ROUTE DEVELOPMENT OVERVIEW

The route development process begins by assembling a multidisciplinary team with a wide range of experiences. Team member expertise includes (but is not always limited to): transmission line routing, impact assessment for a wide variety of natural resources and the human environment, impact mitigation, engineering, construction management, project management, and public relations (the Siting Team). The **Siting Team** includes Company employees and its consultants. The Siting Team works together to develop rebuild requirements, siting criteria, identify siting constraints and opportunities, collect and analyze environmental and design data, solicit public input and concerns, consult with natural resource and permitting agencies, develop and revise the route alternatives, if necessary, and analyze and report on the selection of a proposed Rebuild Route.

The route development process is inherently iterative with frequent modifications made throughout the process as a result of the identification of new constraints; input from agencies, landowners, and other stakeholders; periodic re-assessment of the transmission line to be rebuilt with respect to the siting criteria; and adjustments to the overall route network. As a result of the evolving nature of the route development process, the Siting Team uses specific vocabulary to describe the routes at different stages of development. A rebuild project can be more straightforward but generally follows the same process.

The Company’s electrical planners started the route development process by defining the **Project Endpoints** along the Big Island – Reusens 69-kV Transmission Line. These were identified as the Company's Abert and Reusens substations.

Next, the Siting Team defined the **Study Area** for the rebuild project, which encompasses the Project Endpoints and includes the section of the 69-kV line between the Abert and Reusens Substations with a 1.0-mile buffer on each side of the existing centerline (Attachment B, Map 1). The Study Area consists primarily of forested, developed (residential areas), and open lands

around Monacan Park Road and Burgess Road (Amherst County), Fox Hill Road (Bedford County), and Old Trents Ferry Road (City of Lynchburg) and the James River.

Data Collection (see Attachments C and D) and **Constraints and Opportunities** mapping (see Attachment B) were then completed for the Study Area. Readily available public data sources were used initially and supplemented with stakeholder input, non-public data, and field inspections. The primary opportunity for the Project was identified as rebuilding the Project within or near the existing ROW, which has been in place since 1970. The primary constraints in the study area include residences, gas pipelines, historic resources, recreational resources, streams, and rivers.

Route development for a rebuild project starts with a review of the existing ROW. The Siting Team identified three **Focus Areas** where constraints were present along the existing ROW. These included: Salt Creek, Fox Hill Road, and Judith Creek Focus Areas (see Attachment B, Maps 2 to 4). Within the Study Area, the Siting Team reviewed **Rebuild Segments**, which are segments on the existing centerline, and **Study Segments**, which are segments largely near the existing ROW to avoid constraints in the Focus Areas (see Section 3.0).

The Project team solicited input from the general public and landowners crossed by the rebuild/study segments to determine any refinements of the Study Segments (see Section 4.0). Next, a review of a **Rebuild Route** (see Section 5.0) was completed to determine potential impacts associated with rebuilding in or near the existing ROW. Lastly, based on analysis and stakeholder input, the Siting Team identified a **Proposed Route** and the justification for the Project's Proposed Route selection are summarized in Section 6.0.

3.0 STUDY SEGMENTS

Study Segments are partial off-centerline alignments connecting the Project Endpoints within the Study Area. The Study Segments are developed to meet the need of the Project and minimize environmental, socioeconomic, and cost impacts. Within the three Focus Areas, the Siting Team identified three Study Segments that diverted from the existing centerline (see Attachment B, Maps 2 – 4).

Using the existing ROW generally minimize impacts on the natural and human environments and is consistent with § 56-46.1 and § 56-259 of the Code of Virginia (“Code”), which suggest that existing ROWs should be given priority when siting new transmission facilities, and which promotes use of existing ROWs for transmission facilities. In assessing the suitability of using the existing ROW of the section of the Big Island – Reusens 69-kV Transmission Line for this Project, the Company reviewed and determined the following:

- Company planners indicated that rebuilding within the existing ROW is feasible in regard to outage durations.
- Company ROW agents reviewed the existing ROW easements and determined that they generally allow for rebuilding and upgrading the existing 69-kV transmission line.
- The Siting Team completed a desktop review and field reconnaissance of the existing ROW and concluded that rebuilding portions of the 69-kV transmission line within the existing ROW is reasonable, except in three locations due to the presence of constraints.
- The Siting Team met with local officials and stakeholders who supported rebuilding the 69-kV transmission line in or near the existing ROW.

Along the existing transmission line to be rebuilt, the Siting Team identified three Study Segments as shown in Attachment B, Maps 2 – 4.

Near the Abert Substation, the Siting Team identified the **Salt Creek Focus Area** where the existing ROW runs parallel to a Colonial Gas pipeline (Attachment B, Map 2). The Siting Team evaluated **Study Segment 1**, which is located south and parallel to the existing ROW. Study Segment 1 diverts south from the existing centerline to minimize construction challenges in rebuilding the transmission line adjacent to the pipeline. Study Segment 1 parallels the existing ROW for about one mile. A northern diversion is less practical due to the location of the pipeline and it would require two new pipeline crossings within a short distance.

South of the James River, the Siting Team identified the **Fox Hill Road Focus Area** (Attachment B, Map 3). The Siting Team evaluated **Study Segment 2**, which is an off-centerline segment to minimize impacts to an architectural resource, the Bowling Eldridge House (see Section 5.4) located off Fox Hill Road in Bedford County. Study Segment 2 diverts east and parallels the north side of the existing ROW for about 0.2 mile across Fox Hill Road. While Study Segment 2 and the existing ROW both cross the Bowling Eldridge House property, Study Segment 2 reduces the number of rebuilt structures on the property and minimizes constructability challenges associated with the current pole locations. A western diversion is limited due to impacts on a nearby residence and the Bowling Eldridge House.

At Judith Creek, the Siting Team considered rebuilding the transmission line within or near the existing ROW in the **Judith Creek Focus Area** to minimize constructability constraints (Attachment B, Map 4). The Siting Team evaluated **Study Segment 3**, which diverts to the north side and then the south side of the existing centerline (less than 50 feet) but avoids a new crossing of Judith Creek. A south then north side diversion is limited given the proximity to Judith Creek and this option would result in multiple new crossings of the creek.

4.0 PUBLIC INVOLVEMENT

Following the development of the Study Segments discussed in Section 3.0, the Company invited the public to provide comments and feedback on the Project.

4.1 Project Announcement

The Project was publicly announced with a news release and launch of a Project-specific website on July 28, 2025.

Landowners within a 1,000-foot corridor (500 feet on either side of the Project centerline, including the three Study Segments) were notified of the Project and upcoming open house. Landowner addresses were obtained from Amherst and Bedford Counties and the City of Lynchburg. Notifications included the following activities:

- The Company distributed a news release on July 28, 2025, to announce the Project and upcoming open house.
- Two separate mailings were sent to 125 landowner addresses. A packet was sent on July 24, 2025, which included a letter announcing the Project and open house, Project fact sheet, Project maps, and a comment card with a prepaid postage return envelope. A postcard was sent on July 28, 2025, to announce the Project and open house to landowners.
- Phone calls and emails were used to contact 214 landowners to announce the Project and open house. Landowners received an email on August 5, 2025, and phone calls on August 5 and 11, 2025.

4.2 Public Meetings

The Company hosted one in-person public open house to gather landowner and community feedback. The open house was held on August 12, 2025 from 5:30 to 7:30 p.m. at the Lynchburg Regional Business Alliance, 300 Lucado Place in the City of Lynchburg. The Company presented the initial Study Segments for the Project (see Section 3.0) at the open house. Various stations were set up at the open house that provided information related to engineering and design of structures, Project need, ROW, and construction.

Aerial and topographical map books were provided at the open house for the public to review and were used to record written comments regarding sensitive resources in their local community. Members of the Siting Team greeted meeting attendees, answered questions about the Project, and aided attendees in locating their property or other notable features on aerial maps showing the existing infrastructure and initial Study Segments. Open house attendees were

encouraged to document the location of their houses, buildings, places of business, or other sensitive resources on the printed maps. After the open house, handwritten comments on the maps were digitized and entered into the Project GIS database.

Comment cards were distributed to all meeting attendees. Attendees were encouraged to fill out the card completely and provide current contact information. The Siting Team digitized all comments into the Project GIS database as a record of meeting attendance and public comments. A total of 22 people attended the open house.

The Project website (www.AppalachianPower.com/AbertReusens) includes updates and news releases, an interactive map, fact sheet, and Project timeline. A virtual open house was posted to the Project website where landowners could engage with similar content to that of the in-person public open house. Information related to the Project need, engineering and design of the transmission line, and ROW and construction activities was presented in audio and visual formats. In addition to the comment cards collected at the open house, questions and comments were also accepted through the website.

4.3 Landowner Engagement

The Company received 18 landowner comments mostly related to future construction and access of the transmission line to be rebuilt. The comment cards, emails, and phone call responses returned to the Company were entered into the Project GIS database and generally related to how the rebuilt transmission line would differ from the existing line and general Project information. Landowners also asked questions regarding future construction and preference to utilize existing access roads where possible.

The Company's ROW agents met with landowners in the Project area and those impacted by the Study Segments in fall 2025 and winter 2026. Feedback from these meetings included access and construction considerations for new ROW locations, as well as the placement of proposed structures to help minimize impacts on viewsheds, construction activities, and future access needs. The Company will continue to inform and coordinate with landowners and stakeholders throughout the duration of the Project.

5.0 ROUTE REVIEW

The Siting Team reviewed each Study Segment while considering the Project's constraints, opportunities, and the feedback received from the public and affected landowners.

Given the extensive use of existing ROW on the Project, there are no economically or environmentally viable alternative routes. Abandoning the existing ROW for a new greenfield route is neither practical nor necessary. Furthermore, using the existing ROW for the Project is

consistent with public preferences and general siting guidelines for paralleling or utilizing existing ROWs for new transmission facilities where feasible. Accordingly, Study Segment development and subsequent alternative route development was deemed unnecessary.

In assessing the suitability of using the existing Big Island – Reusens 69-kV Line ROW (the “Rebuild Segment”), the Company conducted the following activities:

- Company planners determined that an extended outage to rebuild the existing within or near the existing ROW is feasible. Furthermore, telecom and distribution line are not co-located on the existing line.
- Company engineers undertook desktop and field examinations and concluded that construction of the proposed Big Island – Reusens 69-kV Line generally on the existing ROW is reasonable and direct between the Project Endpoints.
- Company ROW agents reviewed the existing ROW easements and determined that they generally permit line rebuilds and upgrades. Supplemental easements, however, will be needed to construct new steel poles.
- Environmental Resources Management (“ERM”) was retained to evaluate the environmental impacts of the Project and coordinate with the appropriate environmental agencies. They concluded that using the existing ROW minimizes impacts on the human, visual, and natural environments. Furthermore, new routes would result in more impacts, given that new ROW and associated access roads would be needed.
- Meetings with local officials were conducted in July 2025. Additionally, a public open house was held in August 2025 and landowners were contacted to provide input on the Project.
- In a letter dated July 31, 2025, the Siting Team solicited input from 42 federal, state, and local agencies and/or officials regarding the Project. Responses to the Project were received from 11 representatives of various agencies and are included in Attachment D.

The Study Segments were refined and combined into the **Rebuild Route** (Attachment B, Map 5). After a review of outage planning and open house feedback, the Siting Team carried forward Study Segments 1 – 3 with slight modifications to the centerline to utilize more of the existing ROW while minimizing impacts on a pipeline, historic property, and a stream (Judith Creek).

As discussed earlier, abandoning the existing ROW for a new greenfield route is neither practical nor necessary; therefore, alternative routes were not developed. The following describes potential impacts associated with rebuilding within or near the existing ROW (the “Rebuild Route”). Table 1 provides the evaluation criteria assessment of the Rebuild Route.

Table 1. Project Evaluation Criteria		
Criteria	Unit	Quantity
General		
Length	miles	4.4
Length rebuilt in existing ROW	miles	3.9
Length rebuilt in new ROW	miles	0.5
Acreage of existing ROW	acres	45.6
Acreage of new ROW	acres	7.2
Amherst County	miles	3.1
Bedford County	miles	0.8
City of Lynchburg	miles	0.5
Natural Environment		
Section 10 river crossing	count	1
Total streams crossed (NHD)	count	5
PFO in the ROW (NWI)	acres	NA
PEM in the ROW (NWI)	acres	1.6
PSS wetlands in the ROW (NWI)	acres	NA
Waterbody (lakes, rivers, etc.) crossings ¹	count	5
Prime and unique farmland soil in the ROW ²	acres	3.4
Farmland of statewide importance in the ROW ³	acres	22.8
Forest Conservation Value crossed by ROW (total)	acres	44.4
Average (1)	acres	21.4
Moderate (2)	acres	8.6
High (3)	acres	11.3
Very High (4)	acres	3.0
Outstanding (5)	acres	NA
VDCR Conservation Sites crossed in the ROW	acres	NA
VDCR Stream Conservation Sites crossed in the ROW	acres	NA
Predicted Suitable Habitat	acres	NA
Ecological Cores in the ROW (C5 ranking)	count	3
Ecological Cores in the ROW (C5 ranking)	acres	1.0
Designated natural areas within 250 feet of the ROW	count	0
Eagle nests within 660 feet of the ROW	count	0
Human Environment		
Number of parcels ³ crossed by ROW	count	54
Unique landowners ⁴ within ROW	count	44
Public land (federal/state/local) crossed by ROW	acres	0
Barns, outbuildings, sheds, garages and silos in the ROW (excludes abandoned features)	count	2
Residences within ROW	count	0
Residences within 100 feet of centerline	count	2
Residences within 250 feet of centerline	count	7
Residences within 500 feet of centerline	count	34
Businesses/commercial buildings within 500 feet of the centerline	count	0
Pasture/rangeland crossed in ROW (based on Chesapeake Bay LULC)	acres	0
Cropland crossed in ROW (based on Chesapeake Bay LULC)	acres	0
Conservation easements crossed by ROW	acres	0
Schools within 1,000 feet of centerline	count	0

Table 1. Project Evaluation Criteria		
Criteria	Unit	Quantity
Designated places of worship within 1,000 feet of centerline	count	0
Cemeteries within ROW	count	0
Cemeteries within 250 feet of centerline	count	0
Hospitals and assisted living facilities within 250 feet of centerline	count	0
Parks and recreation areas within 500 feet of centerline	count	0
Scenic byways crossed	count	0
Cultural Resources		
National Historic Landmarks within 1.5 miles of the centerline	count	NA
NRHP-listed architectural resources within 1.0 mile of the centerline	count	3
NRHP-listed Historic Districts within one mile of the centerline	count	NA
NRHP-eligible architectural resources within 0.5 mile of the centerline	count	2
NRHP-listed architectural resources crossed by the ROW	count	1
Locally significant resources crossed by the ROW	count	2
Archaeological sites within ROW	count	0
Constructability		
Interstate highways crossed	count	0
U.S. highways crossed	count	0
State highways crossed	count	0
Local roads and streets crossed	count	9
Railroads crossed	count	1
Airports within 10 nautical miles of the centerline	count	4
Oil and gas pipelines crossed	count	0
Communication towers, AM or FM radio towers within 1,000 feet of the centerline	count	0
Existing Transmission Lines Crossed	count	0
Steep slopes crossed by ROW (>20%), percent of total length	miles	2.4
Heavy angles, greater than 30 degrees	count	4

NA = Not applicable due to the absence of a resource.

LULC = Land Use Land Cover; NHD = National Hydrography Dataset; NRHP = National Register of Historic Places; NWI = National Wetlands Inventory; PEM = Palustrine Emergent Wetlands; PFO = Palustrine Forested Wetlands; PSS = Palustrine Scrub-Shrub Wetlands; ROW = Right-of-Way

¹ The James River is a designated USACE Section 10 navigable waterway.

² Prime farmland is land that has the best combination of physical and chemical characteristics for producing crops.

³ Soils that do not meet the prime farmland category but are still recognized for their productivity by states may qualify as soils of statewide importance.

⁴ The number of parcels crossed refers to the number of individual plots of owned land recorded by Amherst or Bedford Counties, or the City of Lynchburg.

⁵ The number of landowners within the ROW represents the number of individual landowners, who each may own one or more parcels, including the Company.

5.1 Natural Environment

The natural environment includes water, soil, sensitive species, and wildlife habitat. Potential impacts are based on publicly available maps and data as well as coordination with federal, state, and local agencies. Natural resources within the Study Area are shown in Attachment B, Map 6.

Overall, the Rebuild Route will minimize potential impacts on the natural environment by rebuilding within or near the existing ROW. The responses received from the United States Army Corps of Engineers (“USACE”), United States Fish and Wildlife Service (“USFWS”), Virginia Department of Wildlife Resources (“VDWR”), Virginia Department of Conservation and Recreation’s (“VDCR”), Virginia Marine Resources Commission (“VMRC”), Virginia Outdoors Foundation (“VOF”), and Virginia Department of Health (“VDH”) are included in Attachment D. Coordination and review with applicable federal and state organizations will be conducted during the Project's environmental studies.

5.1.1 Surface Waters

The Rebuild Route crosses a total of five National Hydrography Dataset (“NHD”) features: the James River, two unnamed tributaries to the James River, Salt Creek, and Judith Creek. The Rebuild Route uses the existing ROW to cross the James River and Salt Creek. Near the Abert Substation, the Rebuild Route crosses the two unnamed NHD tributaries to the James River in new ROW due to constraints with a nearby natural gas pipeline. The Rebuild Route uses mostly existing ROW to cross Judith Creek; however, a small amount of new clearing along the stream could be necessary. One additional NHD-mapped stream, Johns Creek, flows into the James River and parallels the Rebuild Route where it uses the existing ROW, but is not crossed. The Company notified the USACE of the Project in a letter dated July 28, 2025, but no response was received (see Attachment D). The Project does not anticipate discharges of dredged and/or fill materials into waters of the United States; however, any temporary or permanent discharges would be subject to the permitting requirements of Section 404 of the Clean Water Act (33 Code Federal Regulations 323).

The Rebuild Route unavoidably crosses the James River, a Section 10 navigable waterway, and will require a permit from the USACE. Additionally, the VMRC regulates state waters and permits for any encroachments on or over natural rivers and streams with a drainage area greater than five square miles. In its letter dated July 28, 2025, the Company notified the VMRC of the Project and received a response on August 20, 2025. In its response, the VMRC confirmed the need for a Joint Permit Application (“JPA”) for encroachments over State-owned submerged lands (see Attachment D).

Most wetlands in the Study Area are adjacent to or contiguous with streams and associated tributaries that may be regulated by USACE and VDEQ under Sections 404 and 401 of the Clean Water Act CWA, respectively. The Rebuild Route crosses approximately 1.9 acres of National Wetlands Inventory (“NWI”) wetlands. Less than 0.1 acres of NWI features on the Project consist of PUB wetland. The remaining NWI acreage includes riverine polygons associated with the waterbodies discussed above. To minimize impacts on wetland areas, the Project has been designed to span or avoid wetlands, keeping transmission structures outside of wetland boundaries based on the desktop study.

A response was received from the VDEQ Office of Wetland and Stream Protection's Blue Ridge regional office on August 11, 2025, indicating no comments for the Project. The Company will implement Best Management Practices (“BMPs”) for erosion and sediment control and to control stormwater runoff at all waterbody crossings. Coordination and review with the USACE, VDEQ, and VMRC will be conducted during the environmental studies and permitting phase of the Project. A summary of results from the desktop stream and wetland delineation for the ROW of the Rebuild Route is presented Table 1.

5.1.2 Natural Heritage Resources

The Virginia Natural Area Preserves Act of 1989 defines Natural Heritage Resources (“NHR”) as habitats of rare, threatened, or endangered plant and animal species; rare or state-significant natural communities or geologic sites; and similar features of scientific interest benefiting the welfare of the citizens of the Commonwealth (§ 10.1-209 through 217 of the Code). The Project team consulted VDCR’s Natural Heritage Program (“NHP”) and requested an environmental review to identify NHRs in the Study Area and along the existing transmission line to be rebuilt. In January 2026, a review of the NHP indicates that no natural heritage resources, natural area preserves, stream conservation sites, conservation sites, or state-listed (“T&E”) plants or insect species have been documented in the Study Area and therefore, no further discussion of these resource types is provided in this study. However, the VDCR’s review identified ecological cores within the Study Area as discussed below.

Ecological cores are areas comprising at least 100 acres of continuous interior, natural cover (e.g., forests or woodlands) that provide habitat for a wide range of species, from interior-dependent forest species to habitat generalists. In its January 2026 response, VDCR indicated that the Study Area contains ecological cores ranked C4 (Moderate) and C5 (General). The Rebuild Route crosses three cores, which are all ranked C5, collectively encompassing about one acre. While the Project crosses these C5-ranked cores, the crossings occur in areas where the Rebuild Route uses the existing ROW and no additional clearing is anticipated.

5.1.3 Protected Species

The section of the transmission line to be rebuilt crosses rolling terrain with forested areas and open lands that could be habitat for various species. The USFWS Information for Planning and Consultation (“IPaC”) project planning tool, VDWR’s Fish and Wildlife Information Service (“VaFWIS”) database, and the Wildlife Environmental Review Map Service (“WERMS”) database were used to determine if any T&E wildlife or plant species may occur within the Study Area and/or within a 2.0-mile radius of the Study Area. Digital data was obtained from the VDCR’s Natural Heritage Data Explorer (“NHDE”) to identify locations within the Study Area that potentially support protected species. The databases identified five federal- and/or state-listed or proposed T&E species that have potential to occur within the Study Area or within a 2.0-mile radius of the Study Area.

The databases identified the tricolored bat (*Perimyotis subflavus*), yellow lance (*Elliptio lanceolata*), green floater (*Lasmigona subviridis*), and James spiny mussel (*Parvaspina collina*) as species that have confirmed occurrences within the Study Area and/or within a 2.0-mile buffer around the Study Area. The IPaC tool identified the monarch butterfly (*Danaus plexippus*) as potentially present within the Study Area, but presence of the species was not confirmed. The IPaC report is included in the Company’s VDEQ Supplement.

While VDWR’s Consultation Tools for the Northern long-eared bat, tricolored bat, and Little Brown Bat do not document any occurrences of federal- and/or state-listed bat hibernaculum (winter habitat) within a 2.0-mile radius of the Study Area, the VaFWIS and WERMS databases confirmed the presence of the tricolored bat in one location approximately 0.4 mile east of the Project near the Reusens Substation (where the Rebuild Route uses the existing ROW). Summer foraging habitat for T&E bat species is likely present within forested habitats crossed by the Project. No impacts to T&E bats are anticipated if trees are cleared during the winter according to the VDWR time-of-year restrictions (“TOYRs”).

Potential habitat for the yellow lance, green floater, and James spiny mussel is present within the Study Area, and the VaFWIS and WERMS databases confirmed the presence of all three species within the Study Area. The Rebuild Route utilizes the existing 100-foot-wide ROW across the James River where the species are present and would span the waterbody with no instream construction work anticipated. As such, no impacts are anticipated on the yellow lance, green floater, or James spiny mussel. The Company will employ BMPs before, during, and after construction to control erosion and sediment runoff, prevent stream and groundwater flow changes, and reduce adverse impacts on aquatic and riparian habitat. Coordination with the VDWR and USFWS will be conducted to verify if any species-specific surveys are required.

5.2 Human Environment

The human environment includes the use of the land and activities at a given location such as agricultural, forestry, residential, industrial, mining, commercial, institutional, scenic assets, and recreational uses. The Big Island – Reusens 69-kV Transmission Line has operated since the 1960s. The opportunity to use or parallel existing ROWs minimize conflicts with the existing and proposed land uses as compared to a new transmission line ROW in an area where one does not currently exist.

The Rebuild Route is approximately 4.4 miles long and mostly uses the existing ROW to minimize impacts on the human environment. The Rebuild Route includes three minor diversions of the existing centerline (totaling approximately 1.5 miles) to minimize constructability challenges or avoid constraints. Where new ROW is proposed (totaling approximately 7.2 acres), the Company's ROW agents have spoken with and/or met with each landowner crossed by the diversions to discuss the Project. In locations where the Project will be rebuilt in new ROW, it is anticipated that the unused portion of the existing ROW will be relinquished as part of a supplemental agreement with the landowner.

Coordination and review with applicable federal, state, and local organizations will be conducted during the environmental studies and permitting phase of the Project.

5.2.1 Land Use Planning and Land Cover

In § 15.2-2223 of the Code, localities are required to adopt a comprehensive plan that provides guidance for physical development within its jurisdiction. Comprehensive plans assess existing and future land uses, anticipate development trends, and make recommendations for guiding the long-term development decisions of a local jurisdiction.

Most of the Project (approximately 3.1 miles, or about 70% of the total length of the Rebuild Route) is located within Amherst County. The Amherst County Comprehensive Plan 2007-2027 (updated in 2022) does not specifically state electric utilities. The Rebuild Route is within or near the existing ROW and crosses residential and forested areas along Salt Creek Road, Burgess Road, Monacan Park Road, and Ruth Drive. The Rebuild Route diverts from the existing centerline for approximately 0.8 miles, on properties already crossed by the existing ROW, in order to relocate transmission structures away from an existing Columbia Gas pipeline. According to the Future Land Use Map, the Project lies within areas designated as Agriculture Limited and Low Density Residential. Within the Low Density Residential future land use area, the Project lies within a Designated Public Water Growth Area.

Approximately 0.8 miles of the Rebuild Route (or about 19% of its total length) is located within Bedford County. The Bedford County 2035 Comprehensive Plan supports safe, environmentally

sensitive, and cost-efficient delivery of reliable utility services. The Rebuild Route remains mostly in the existing ROW and crosses Fox Hill Road and Fox Meadows Road in an existing residential area. The Rebuild Route diverts from the existing centerline (less than 0.1 miles) at Fox Hill Road in order to minimize impacts on a historic resource (see Section 5.4) and constructability constraints with the current pole locations. According to the Future Land Use Map, the Project lies within an area designated as Residential.

Approximately 0.5 miles of the Rebuild Route (or about 11% of its total length) is located within the City of Lynchburg. The City’s Comprehensive Plan 2030 includes a Public Utilities chapter (Chapter 13), but this section addresses only water, wastewater, and stormwater infrastructure and does not reference electric transmission facilities. The Rebuild Route mostly remains within the existing ROW, which follows parcel boundaries, and crosses Old Trents Ferry Road near existing residential areas to reach the Reusens Substation. According to the Future Land Use Plan (Chapter 6), the Project lies within areas designated as Low Density Residential and Resource Conservation (along Judith Creek).

Members of the Siting Team met virtually with local officials from Bedford and Amherst Counties and the City of Lynchburg on July 21, 2025 to introduce the Project. The Siting Team explained that the transmission line would largely be rebuilt in the existing ROW to minimize overall impacts on the area, which include residential and forested areas. As such, the Rebuild Route is mostly within the existing ROW, which minimizes impacts on Amherst and Bedford Counties’ and the City of Lynchburg’s existing and future land uses. The Company will continue to coordinate with Amherst and Bedford Counties and the City of Lynchburg during the permitting phase of the Project.

ERM identified land use and land cover (“LULC”) within the Study Area using a combination of local and statewide datasets and aerial photo interpretation to identify the most current uses for a given area (Chesapeake Bay LULC 2024). The Rebuild Route crosses mostly open lands, which includes the existing ROW, for approximately 34.3 acres and no agricultural lands. The Rebuild Route crosses an additional 14.9 acres of forested lands, 1.6 acres of water (including the James River), and 2.1 acres of developed lands. Abandoning the existing ROW for a new greenfield route is neither practical nor necessary as it would introduce greater impacts on LULC; therefore, no viable alternative routes were identified for the Project (Attachment B, Map 5).

5.2.2 Conservation Easements and Lands

Conservation easements and lands help preserve and improve water and habitat quality. In addition to managing lands under its jurisdiction, the VDCR helps landowners, land trusts, and localities by serving as a clearinghouse, keeping an inventory of protected lands, and providing

grants and information on easements and land protection. The agency also helps by identifying important open space and lands rich with plant and animal diversity.

Using the VDCR’s Managed Conservation Lands Database, the Project team identified three conservation easements located in the Study Area; however, no conservation easements or open space easements qualifying under § 10.1-1009 – 1016 or § 10.1-1700 – 1705 of the Code are crossed by the Rebuild Route. The Rebuild Route uses the existing ROW where the Project is closest to these conservation easements, which include the Central Virginia Land Conservancy and Virginia Outdoors Foundation (“VOF”). No Virginia Department of Forestry (“VDOP”) easements were identified in the Project Study Area.

In a response dated August 12, 2025, the VOF determined that no existing or proposed VOF open space easements would be impacted by the Project (see Attachment D). Where necessary, the Company will continue to coordinate with the relevant organizations and agencies to review conservation easements and lands as they occur in or near the Project area.

5.2.3 Built Environment

All residences within the Study Area are single-family dwellings on agriculturally-zoned or low-density residential properties. ERM identified residences within 100 feet, 250 feet, and 500 feet of the Rebuild Route through field reconnaissance and review of various digital datasets, maps, and recent (2023) digital aerial photography. There are two existing residences within 100 feet of the centerline of the Rebuild Route where the existing ROW will be used. There are seven existing residences within 250 feet and 34 existing residences within 500 feet of the centerline of the Rebuild Route. Commercial and industrial areas and buildings, including office buildings, retail/mixed use areas, and commercial businesses, are not present near the Rebuild Route. There are no schools, cemeteries, or places of worship within 500 feet of the Rebuild Route.

There are two outbuildings that appear to have encroached within the existing ROW at Monacan Park Road and Burgess Road. The Rebuild Route uses the existing ROW at these locations to avoid impacts on nearby residences located near the existing ROW. Accordingly, and subject to completion of final engineering and ROW negotiations, the Company will continue to coordinate with the affected landowners to determine if any structures will need to be removed or relocated to accommodate the rebuilt line.

ERM obtained information on planned developments through publicly available data on Amherst and Bedford County and City of Lynchburg websites and through the initial Project introduction meeting. No planned developments were identified within the Project’s Study Area.

5.2.4 Recreational Resources

ERM collected information on recreational resources through digital datasets and maps, recent (2023) digital aerial photography, publicly available information on county and city websites, and community input.

There are no local public or state parks, designated wilderness areas, or game lands within 0.25 miles of the Rebuild Route. The nearest local park, Monacan Park, is about 0.7 miles west of the Project and adjacent to the James River at Monacan Park Road. Given the distance to these resources, no impacts from the Project are anticipated.

The Virginia Scenic Rivers Act seeks to identify, designate, and protect rivers and streams that possess outstanding scenic, recreational, historic, and natural characteristics of statewide significance for future generations. The Project crosses the James River in the existing ROW, however this section of the river is not a state-designated scenic river or a Blueway (as discussed in Section 5.5).

5.3 Environmental Justice

It is the Company's long-standing practice in its route development processes to avoid or reasonably minimize impacts to the human environment, which includes Environmental Justice ("EJ") communities (community of low-income or color) and fence line communities within the meaning of the Virginia Environmental Justice Act ("VEJA") (§ 2.2-234 et seq. of the Code). VEJA states that "Environmental justice means the fair treatment and meaningful involvement of every person, regardless of race, color, national origin, income, faith, or disability, regarding the development, implementation, or enforcement of any environmental law, regulation, or policy".

The Siting Team reviewed demographic data from the American Community Survey ("ACS") from the United States Census Bureau ("USCB") and low-income community data from the Virginia EJSreen+ mapping program (2025). The Census Block Group ("CBG") data is the smallest geographic unit for which USCB demographic data is available and was used to review the Project. Per the ACS data, there are six CBGs located within one mile of the centerline of the Rebuild Route. These six CBGs are crossed by the Rebuild Route. Five of the six CBGs exceed the threshold of at least one "EJ community" as defined by VEJA; however, the CBG with the greatest diversity of EJ Communities is not crossed by the Rebuild Route. Of these five CBGs that are crossed, two CBGs contain populations that identify as two or more races and one CBG contains a population of American Indian or Alaska Native. Two CBGs within one mile of the centerline of the Rebuild Route contain populations that are considered low-income populations; however, only one is crossed by the Rebuild Route. The results of the dataset are provided in Table 2 and the CBGs identified within one mile of the Rebuild Route are depicted in Attachment B, Map 7.

The Company performed meaningful involvement from all potentially affected groups through various methods to gain public input on the Project. These activities included: collecting landowner comments through mail, email, and voicemail messages, gathering landowner input on the Project at the open house, refining the Study Segments (see Section 3.0) while considering landowner preferences, and meeting with individual landowners throughout the siting process and other efforts outlined in Section 4.0. The Rebuild Route crosses EJ communities along most of its length, and impacts associated with construction will be temporary. The Company will continue to engage all affected landowners, including EJ communities as defined in the VEJA throughout the duration of the Project.

Table 2. Environmental Justice Communities

CBG within one mile of centerline	Crossed by Centerline (Yes/No)	Population	Total Populations of Color	White Alone	Black or African American Alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Hispanic or Latino	Low-Income Population	Limited English-Speaking Household	Linguistic isolation	Less than high school	Under age 5	Over age 64
Virginia ²		8,657,499	41%	59%	18%	0.1%	7%	0.1%	0.5%	4%	11%	23%	3%	3%	9%	6%	16%
516800001001	Yes	1,355	21%	79%	13%	0%	0%	0%	0%	5%	3%	18%	0%	0%	3%	6%	52%
510190301011	Yes	1,399	13%	87%	0%	0%	2%	0%	0%	11%	0%	13%	0%	0%	4%	8%	16%
510090101004	Yes	1,600	15%	85%	12%	0%	2%	0%	0%	0%	1%	44%	0%	0%	20%	2%	22%
510090103002	Yes	1,560	10%	90%	4%	1.2%	0%	0%	0%	3%	1%	20%	1%	1%	3%	4%	26%
516800001002	No	1,464	32%	68%	9%	0.5%	1%	0%	3.2%	7%	11%	49%	2%	2%	1%	4%	12%
516800001003	Yes	1,378	3%	97%	0%	0%	2%	0%	0%	2%	0%	10%	0%	0%	0%	14%	13%

¹ Per the Virginia Environmental Justice Act, “Low-income community” means any CBG in which 30 percent or more of the population is composed of people with low income.

² Virginia Population (U.S. Census Bureau 2026)

Bold text indicates populations, as defined in VEJA, which exceeds the state average, and are crossed by the Rebuild Route.

Gray shaded cells indicate reference populations.

Green shaded cells indicate identified minority populations as defined in Virginia Environmental Justice Act, which exceeds the state average.

Yellow shaded cells indicate identified low-income populations as defined in Virginia Environmental Justice Act, which exceeds the state average.

5.4 Cultural Resources

In March 2026, ERM conducted a Pre-Application Analysis (the “Pre-App”) of cultural resources for the Project in accordance with VDHR’s “Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia” (2008) and the SCC Division of Public Utility Regulation’s “Guidelines for Transmission Line Applications Filed Under Title 56 of the Code” (August 2017). The Pre-App is included in Volume 2 of the Company’s Application to the SCC.

Background research was conducted to identify all previously recorded cultural resources through the review of historic documents, agency and public input, and various archives including the VDHR’s Virginia Cultural Resources Information System database, (“VCRIS”). In addition to the VCRIS, ERM collected information from the Bedford Museum and Genealogical Library (2026), Preservation Virginia (2026), City of Lynchburg Historic Districts and Sites (City of Lynchburg 2026), and Lynch’s Ferry Magazine (2026) to find locally significant resources within a 1.0-mile radius of the Rebuild Route’s centerline.

There are three National Register Historic Places (“NRHP”)-listed architectural sites within one mile of the Rebuild Route: Hope Dawn (VDHR# 009-0043); Virginia Episcopal School (VDHR# 118-0224); and Presbyterian Orphans Home (VDHR# 118-5240). There are two NRHP-eligible architectural sites within 0.5 miles of the Rebuild Route: Reusens Dam (VDHR# 118-0218) and CSX Railroad (VDHR# 118-5546). There is one NRHP-listed architectural site, the Bowling Eldridge House (VDHR# 009-5283) crossed by the Rebuild Route. Lastly, there are two locally significant resources crossed by the Rebuild Route, the Buckley House (VDHR# 118-5717) and Bethel/Salt Creek (VDHR# 005-5336).

A field reconnaissance was conducted in January 2026 for each previously recorded historic resource that meets the criteria in the guidelines. Visual inspection and simulation indicated the intervening distance, topography, and/or vegetation limits significant or new viewshed impacts of the Project to these historic resources. The anticipated heights of the proposed structures range between 65 and 86 feet. The rebuilt structures will be approximately 20 feet taller than the existing structures. Given the Project will mostly be rebuilt in the existing ROW, it is anticipated that the Project will have no impact on five resources (009-0043, 118-0218, 118-0224, 118-5240, and 118-5546) and no more than a minimal impact on three resources (005-5336, 009-5283, and 118-5717).

5.5 Visual

The aesthetic or scenic character of a landscape refers to the overall visual qualities that give a landscape its distinct and recognizable identity. Visual resources capture the features (e.g., topography/terrain, vegetation, waterbodies, human development), elements (forms, lines, colors, textures), patterns and spatial relationships, and visual composition that characterize and contribute to a landscape’s visual quality. Impacts on visual resources occur when the existing visual character of the landscape (environment) is substantially modified or altered by a project. The assessment of visual impacts describes existing conditions and the changes anticipated at full buildout of the Project through the comparison of existing photographs and photographic simulations of the Project at representative key observation points (“KOPs”). The corresponding impact significance is a function of the magnitude of changes in landscape characteristics and the sensitivity of primary viewer groups.

The section of the existing Big Island – Reusens 69-kV Transmission Line between the Abert and Reusens Substations is comprised mostly of a series of wooden, H-frame structures that are routed primarily through dense forest vegetation. The existing line and ROW crosses private properties, local roads, and the James River. This area is characterized by rolling to steep topography, a broad and curving river, dense deciduous forests that are occasionally interspersed with low lawns, and low density development.

There are no designated scenic rivers or scenic byways crossed by the Rebuild Route (VD CR 2024). Other recreational resources, as discussed in Section 5.2.4, are within the Study Area. State Route 130 (Elon Road), a designated scenic byway, is nearly 1.5 miles east of the Project, and Monacan Park, an Amherst County public park, is approximately 0.7 miles west of the Project. Visibility from either of these recreation/tourism facilities is limited since the intervening topography and forest cover generally limits broad, panoramic views of the area and enclose the landscape. The Rebuild Route creates a series of tall, repetitive, and solid structures with definitive vertical and horizontal lines that are connected by thin, slightly undulating, horizontal overhead lines on the landscape; however, because of the hilly terrain and dense forest cover, these existing structures are primarily visible only where they cross public roads, open lands, and the James River.

The Project would replace the existing wooden H-frame structures with galvanized steel structures that are on average approximately 20 feet taller (subject to final engineering). The form and lines of the proposed steel H-frame structures are expected to be similar to the existing structures. While there may be a slight change in color, the metallic gray of the proposed steel structures would primarily be analogous to the matte, light brown color of the existing structures. Except in three locations, the Rebuild Route is within the existing 100-foot-wide maintained ROW. As such, the Project minimizes new vegetative clearing and mitigates the potential for

substantive changes in the forms, lines, colors, and textures that characterize the existing vegetation. Overall, replacing the existing infrastructure with similar but new infrastructure primarily within the existing ROW would help decrease the potential for increased visibility and related changes in the visual characteristics along and in the vicinity of the route.

Table 3 summarizes the existing visual characteristics and anticipated changes from the Rebuild Route at several area KOPs. Attachment E includes a figure with the KOPs and existing conditions photographs and photographic simulations of proposed conditions within the Project area.

In general, the replacement of the existing transmission line and construction of the new route will have negligible impacts on visual resources. Construction of the new route will create visual disruptions (e.g., equipment, materials, additional traffic), but these changes will be temporary and only occur in specific locations as the route is rebuilt. Since the new structures (poles and conductors) will be similar to the existing route, any changes in the visual features and elements that characterize the area are anticipated to be minimal. Similar to the existing transmission line, the Rebuild Route will mostly be obscured from public view because of the area topography and dense forest cover. The Rebuild Route will cross several large lawn areas (similar to existing conditions) where it will be more visible to residents and motorists on adjacent roads. Additionally, occasional road crossings in dense forested areas will also continue to provide brief, but more expansive glimpses of the route and ROW to motorists.

Table 3. Visual Resources Evaluation			
KOP	Location	Existing Conditions	Proposed Conditions
302	On Burgess Road less than 0.1 miles to the south/southwest of the Rebuild Route centerline.	<ul style="list-style-type: none"> <i>Topography:</i> gently sloping but mostly obscured by vegetation and built environment. <i>Vegetation:</i> dense, tall, thin, multi-branched forms that create a series of repetitive vertical lines interspersed with grasses and shrubs; density of vegetation forms tall, walls that generally enclose views to the road corridor. <i>Built Environment:</i> smooth, flat, curving road; solid, square, geometric home and utility boxes; tall, thin, paired transmission line poles (h-frame structure); thin, horizontal, overhead conductors mostly obscured by vegetation. 	<ul style="list-style-type: none"> <i>Topography:</i> no perceptible change. <i>Vegetation:</i> slight reduction in density on the right side of the road, but the overall landscape elements would remain similar to existing conditions. <i>Built Environment:</i> slight changes to the forms and lines because of the removal of the single transmission structure that was previously visible along the left side of the road; vegetation trimming in ROW along right side of road could make the new thin, linear, overhead conductors more visible compared to existing conditions (the conductors would still primarily be obscured by or absorbed into the vegetation).
303A	On Fox Hill Road about 0.1 miles to the west of the Rebuild Route centerline.	<ul style="list-style-type: none"> <i>Topography:</i> low, flat, with slight undulations and slopes; mostly obscured by vegetation and built environment. <i>Vegetation:</i> mix of lawns and adjacent forest patches; lawns are low, flat, and smooth; forested areas add tall, dense, vertical forms that frame the broad, open lawns; individual trees are the tallest features with rounded, amorphous, and conical forms and straight, vertical, and branching lines. <i>Built Environment:</i> low, flat, curving road bisects the view; short, straight, angular, geometric, fences and walls (including entrance gates) create linear boundaries that parallel the road; tall, thin, linear H-frame structure appears on the right side of the road while a second H-frame structure further to the right is partially obscured by trees; thin, horizontal, slightly sloping overhead lines are apparent above the road (from the H-frame structure to the left) but mostly obscured by trees. 	<ul style="list-style-type: none"> <i>Topography:</i> no perceptible change. <i>Vegetation:</i> slight change in vegetation density on left side of road but other modifications to existing vegetation are not perceptible. <i>Built Environment:</i> three tall, thin, vertical poles (turning structure) clustered along left side of road (replaces H-frame structure that was previously on the right side of the road); second set of clustered, vertical poles partially visible through trees on the right side of the road; all new poles/turning structures are similar in height and width or shorter/thinner than adjacent trees, which helps absorb them into the setting; multiple thin, slightly undulating, horizontal overhead conductors that cross the road and connect to the poles (similar to existing conditions).
303B	At the intersection of Fox Hill Road and Fox	<ul style="list-style-type: none"> <i>Topography:</i> low, flat, with short slopes and changes in elevation (primarily along road); mostly obscured by vegetation and built environment. 	<ul style="list-style-type: none"> <i>Topography:</i> no perceptible change. <i>Vegetation:</i> no perceptible change.

Table 3. Visual Resources Evaluation

<p>Meadows Road less than 0.1 miles to the east of the Rebuild Route centerline.</p>	<ul style="list-style-type: none"> • <i>Vegetation:</i> tall, vertical, dense lines and clusters of trees that form contiguous walls of vegetation; low, smooth lawns adjacent to road in some areas; individual trees are the tallest features with rounded, amorphous, and conical forms and straight, vertical, and branching lines; evergreen greens add deep green, conical forms to the forested areas. • <i>Built Environment:</i> intersection where several low, flat, curving roads meet; short, straight, angular, geometric, fences that parallel the road; triangular, white and red geometric structure partially visible beyond fence and in trees to the left of the road; tall, thin, linear H-frame structure appears on the left side of the road; thin, horizontal, overhead lines are somewhat visible against open sky but otherwise obscured by trees. 	<ul style="list-style-type: none"> • <i>Built Environment:</i> three tall, thin, vertical poles (turning structure) clustered where road curves to the left (replaces H-frame structure that was previously on the other side of the road); form, lines, and colors of new poles are similar to adjacent trees helping to absorb them into the setting; multiple thin, slightly undulating, horizontal overhead conductors cross from the new poles to the left; these new conductors are more apparent compared to existing conditions because they cross more open sky and then cross in front of the adjacent tree line.
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5.6 Constructability

Constructability is the ability to efficiently and cost effectively engineer, acquire ROW, construct, operate, and maintain the rebuilt transmission line. Major factors include safety, steep topography, access, and the ability to parallel or use existing ROWs. The Rebuild Route is largely within the existing ROW, minimizing constructability impacts, although more than half of its length crosses slopes exceeding 20%.

Near the Abert Substation, the existing transmission line ROW is located near a Columbia Gas pipeline. The Rebuild Route is diverted to the south to minimize constructability constraints and relocate the structures away from the pipeline. The Company met with Columbia Gas in October 2025 to discuss the Project and no concerns were noted for the southern shift. The Proposed Route crosses one railroad (CSX Railroad) at the James River in the existing ROW. The Company will continue to coordinate with Columbia Gas and CSX Railroad throughout the duration of the Project.

The Rebuild Route is largely within the existing 100-foot-wide ROW and crosses local roadways and the James River at existing locations. The rebuilt transmission structures are mostly located in-line or near the existing poles to minimize new impacts. The Rebuild Route avoids new crossings of local roadways, except minor centerline shifts at Salt Creek Road and Fox Hill Road, where impacts on construction and a historic property are minimized. The Rebuild Route crosses nine local roads primarily at existing locations. Responses were received from Virginia Department of Transportation’s (“VDOT”) Bedford and Lynchburg district offices on July 31, 2025 and August 9, 2025, respectively (see Attachment D). No active transportation or road projects were identified near the Project. The Company will continue to coordinate with the localities and VDOT during the Project’s permitting and construction phases.

6.0 PROPOSED ROUTE

Based on stakeholder input and analysis, the Siting Team concluded that building within or near the existing ROW (the Rebuild Route) was the most suitable location. Abandoning the existing ROW for a new greenfield route, which would introduce new impacts, is neither practical nor necessary; therefore, alternative routes were not developed for the Project. Environmental impacts associated with the Rebuild Route would be low and generally limited to temporary construction related impacts, which will be mitigated with proper stormwater controls, traffic control, and active communication to the public. Visually, the Rebuild Route would be similar in size, number, and character.

Collectively, the Siting Team determined that the **Proposed Route**, which includes the Rebuild Route, meets the goal of minimizing impacts on land use and the natural and cultural resources along the Project, while avoiding circuitous routes, extreme costs, and non-standard design requirements.

Attachment A: Outreach Fact Sheet

Abert - Reusens Transmission Improvements Project

Appalachian Power representatives plan to upgrade the electric transmission grid in Amherst and Bedford counties and the city of Lynchburg. Construction begins fall 2028 and concludes by spring 2029.

What

The project involves:

- Rebuilding approximately 5 miles of 69-kilovolt (kV) transmission line in or near the existing right-of-way
- Associated upgrades to the Abert Substation

This project involves filing an application with the Virginia State Corporation Commission (SCC).

Why

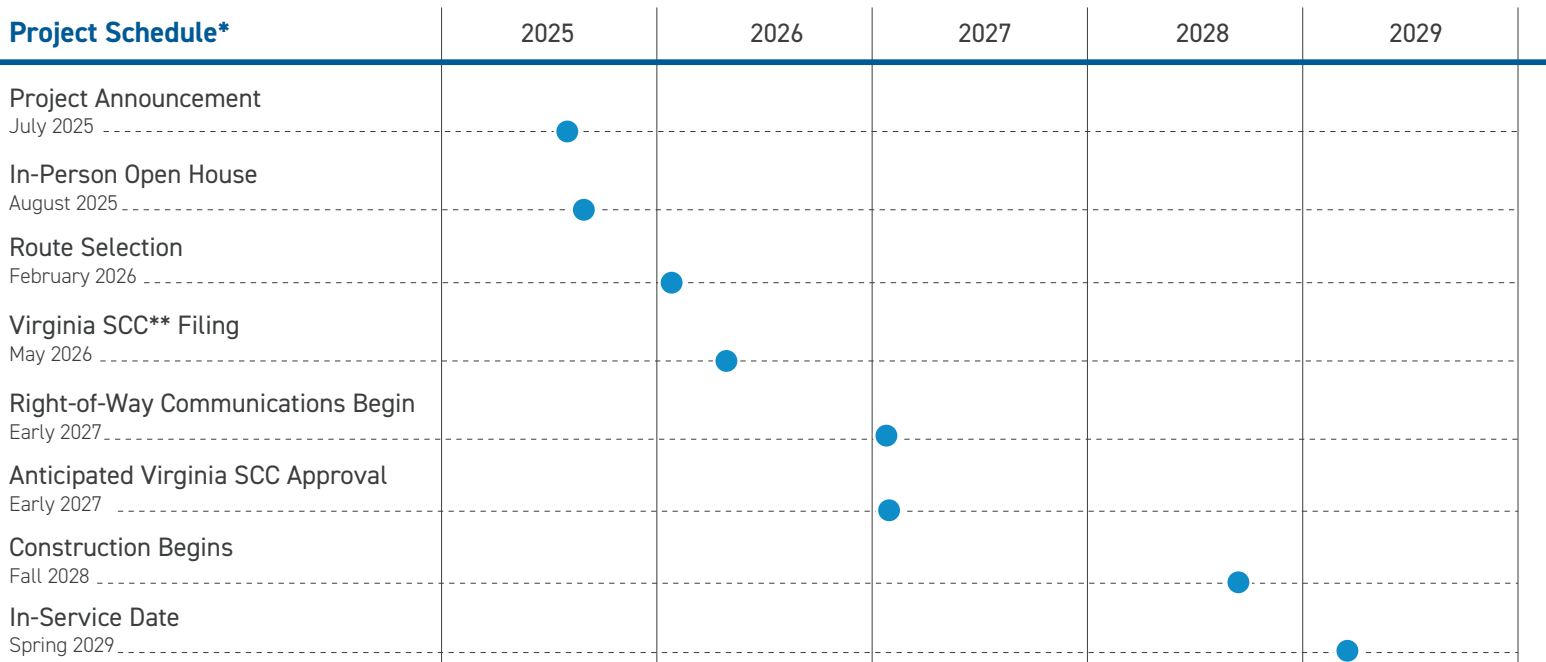
Project benefits include:

- Increasing electric reliability and reducing outages for area customers
- Replacing aging infrastructure to ensure safer, more efficient energy delivery
- Increasing line capacity to meet growing demand for electricity

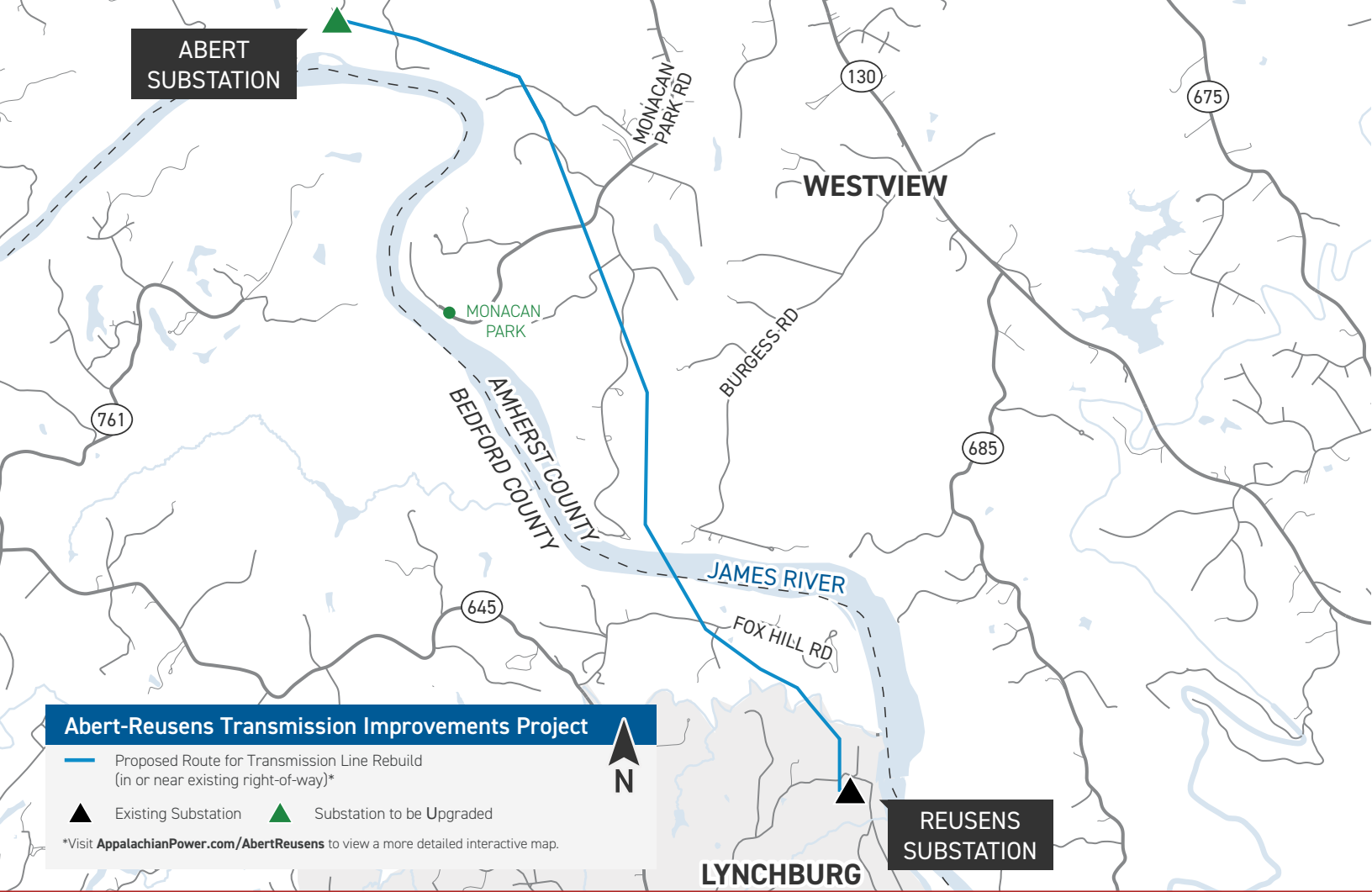
Where

The project area includes:

- Amherst County
- Bedford County
- City of Lynchburg



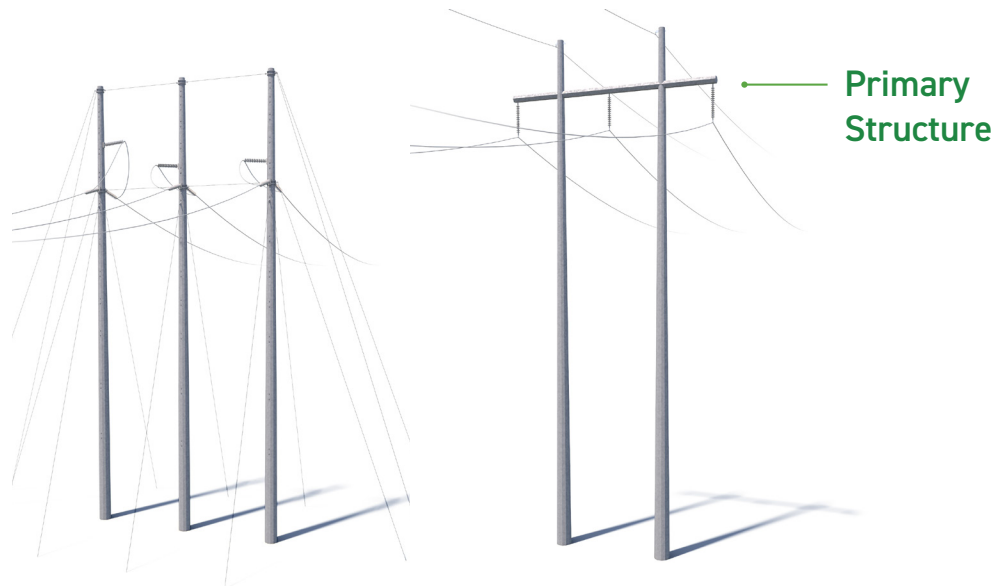
*Timeline subject to change. ** State Corporation Commission



Typical Structures

Crews plan to install steel H-frame and 3-pole structures along the line route.

Typical Structure Height:
Approximately 70-90 feet*
Typical Right-of-Way Width:
Approximately 100 feet*



Exact structure, height, and right-of-way requirements may vary.



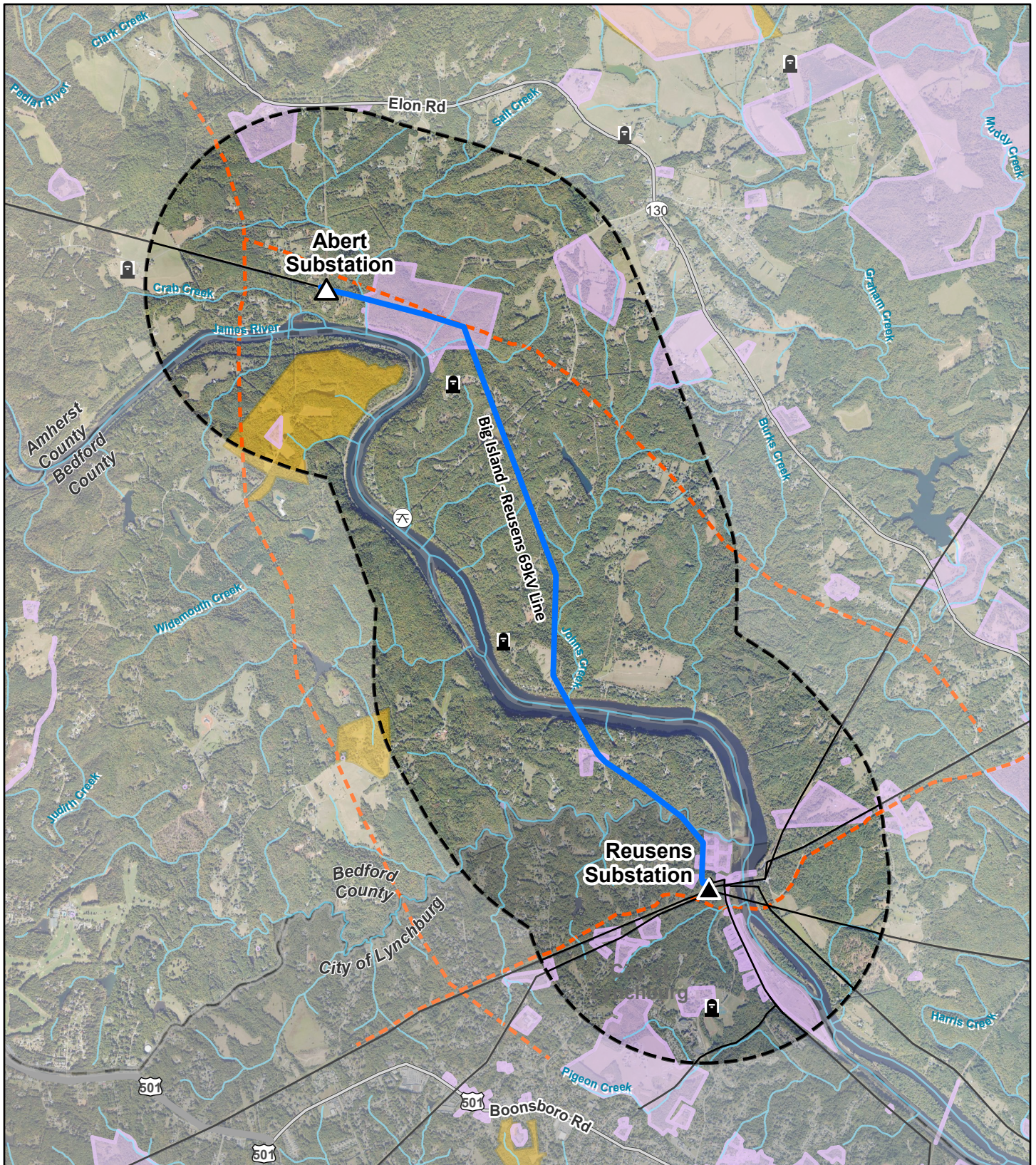
We value your input. Please send comments and questions to:

Nancy Miller • Project Outreach
Apco_Outreach@aep.com • 833-760-0604

AppalachianPower.com/AbertReusens

04/17/2026

Attachment B: Project Maps (Maps 1 – 7)

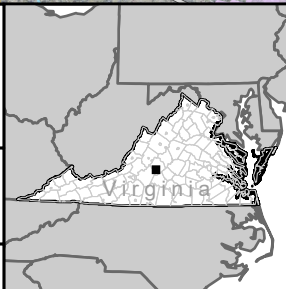


- ▲ Existing AEP Substation
- △ Existing AEP Substation to be Upgraded
- Existing AEP Transmission Line
- Existing AEP Transmission Line to be Rebuilt
- Existing AEP Transmission Line to be Upgraded
- Existing Natural Gas Line
- Study Area
- ☠ Cemetery/Burial Ground
- Ⓣ Local Park
- Architectural Resource (VDHR)
- Conservation Easement (VDHR)

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983

May 2026

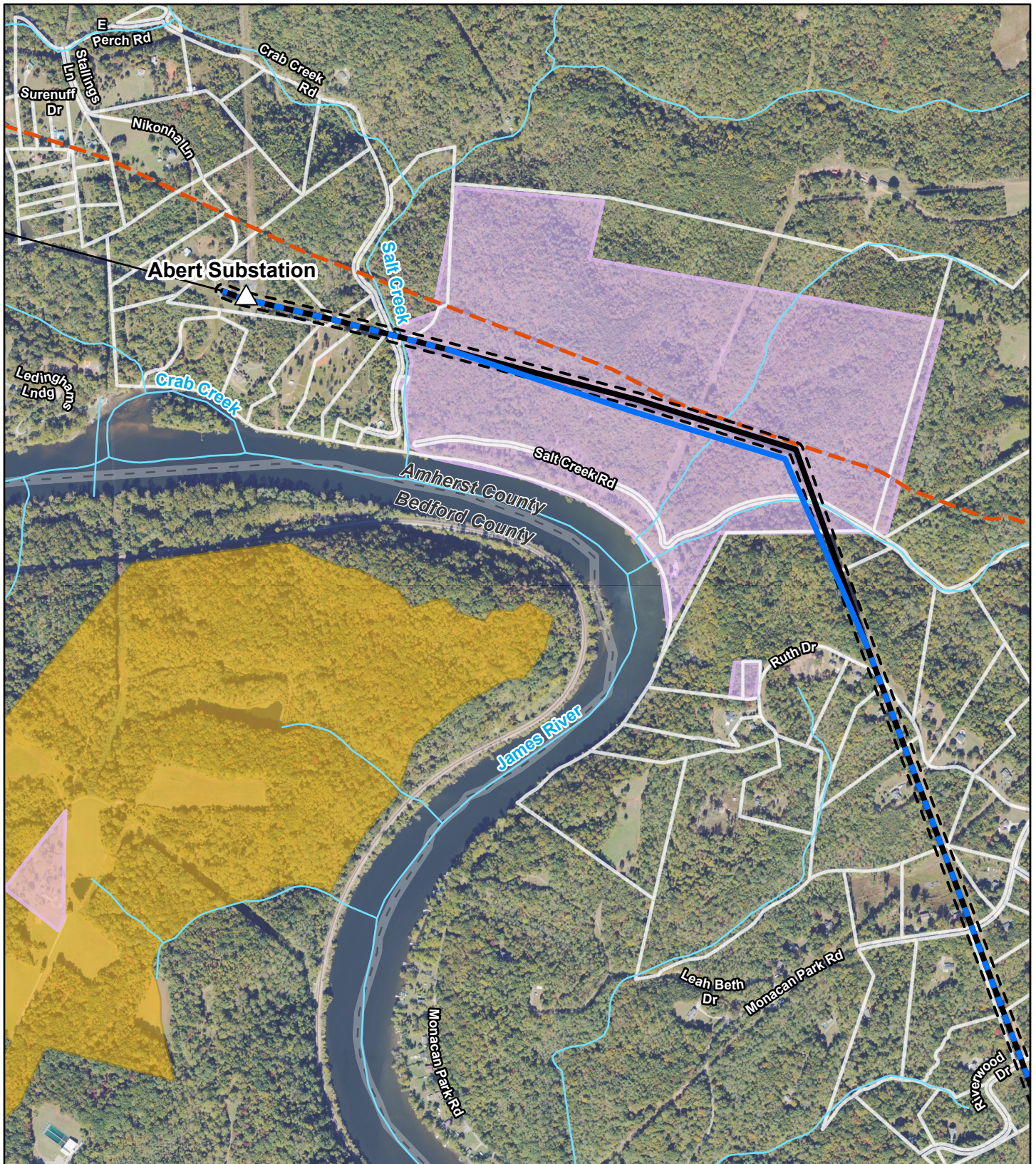


Map 1 Study Area

**Abert - Reusens Transmission
Improvements Project**

0 0.25 0.5 0.75 1

Miles



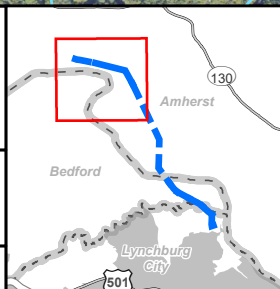
- △ Existing AEP Substation to be Upgraded
- Study Segment 1
- Existing AEP Transmission Line to be Rebuilt
- Existing AEP Transmission Line
- Existing Natural Gas Line
- Existing Right of Way
- Architectural Resource (VDHR)
- Conservation Easement (DCR)

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



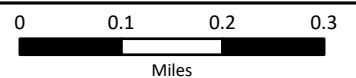
May 2026

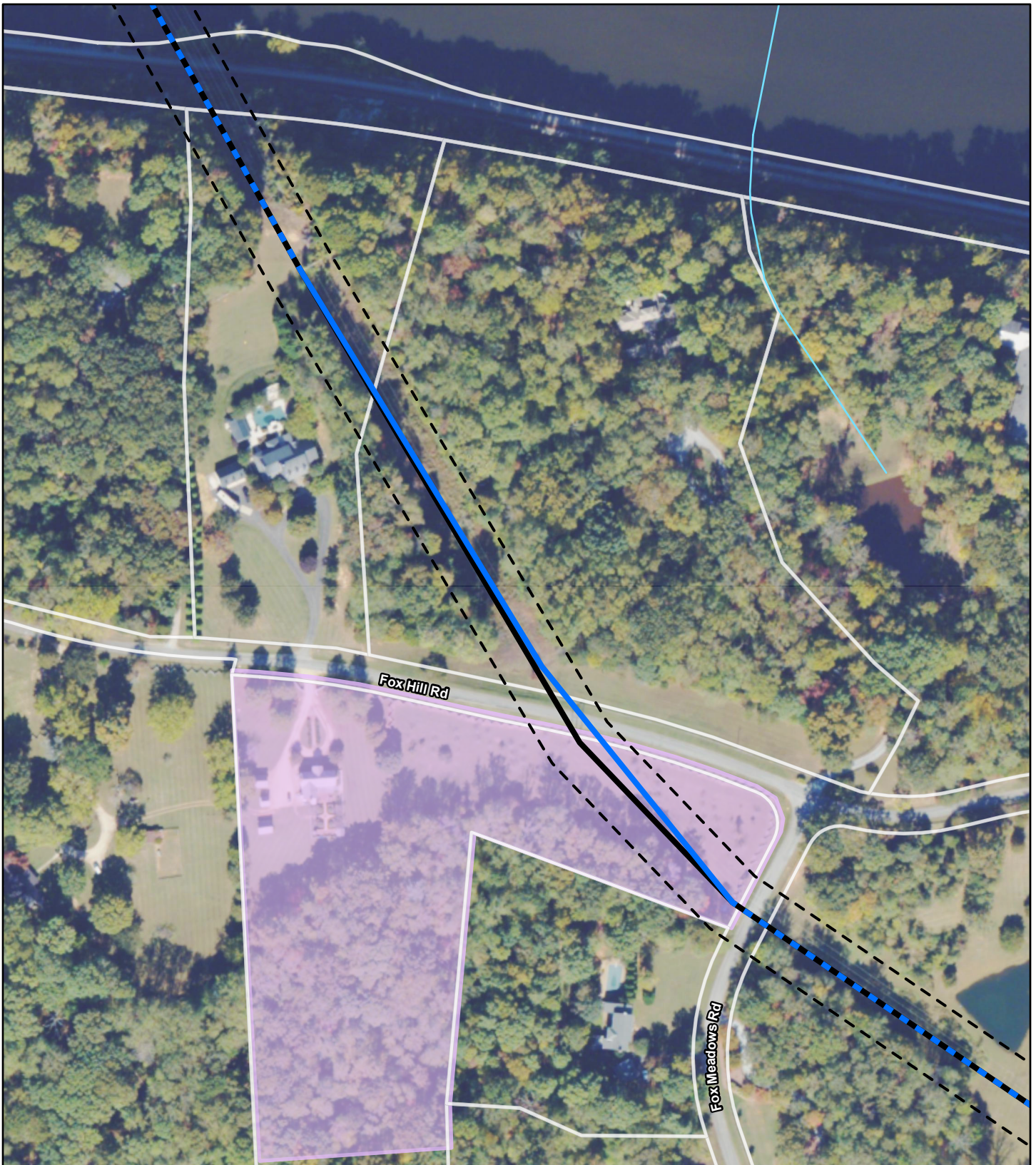


Map 2 Salt Creek Focus Area



Abert - Reusens Transmission
Improvements Project





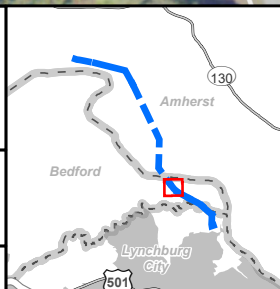
- Study Segment 2
- - - Existing AEP Transmission Line to be Rebuilt
- Existing AEP Transmission Line
- - - Existing Right of Way
- Architectural Resource (VDHR)

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



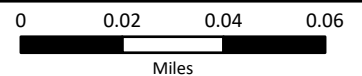
May 2026



Map 3 Fox Hill Road Focus Area



Abert - Reusens Transmission
Improvements Project





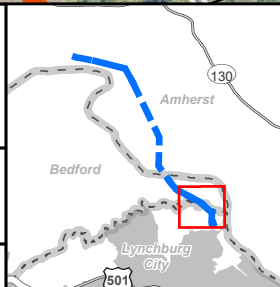
- ▲ Existing AEP Substation
- Study Segment 3
- Existing AEP Transmission Line to be Rebuilt
- Existing AEP Transmission Line
- Existing Natural Gas Line
- Existing Right of Way
- Architectural Resource (VDHR)

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



May 2026

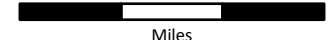


Map 4 Judith Creek Focus Area

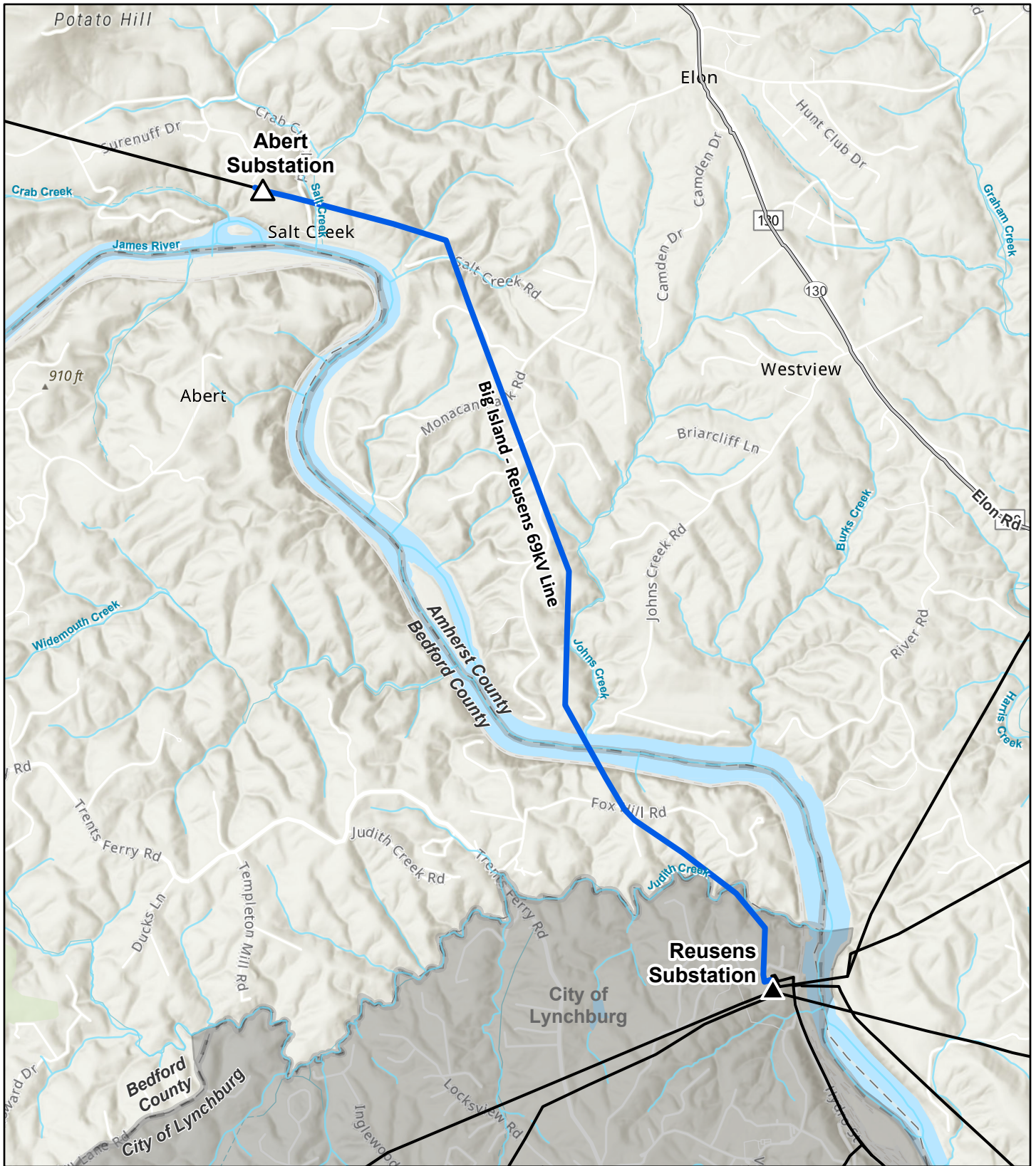


Abert - Reusens Transmission
Improvements Project

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Miles



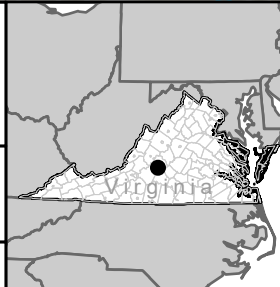
- ▲ Existing AEP Substation
- △ Existing AEP Substation to be Upgraded
- Existing AEP Transmission Line to be Rebuilt
- Existing AEP Transmission Line

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



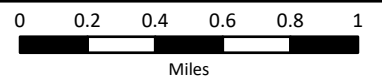
May 2026

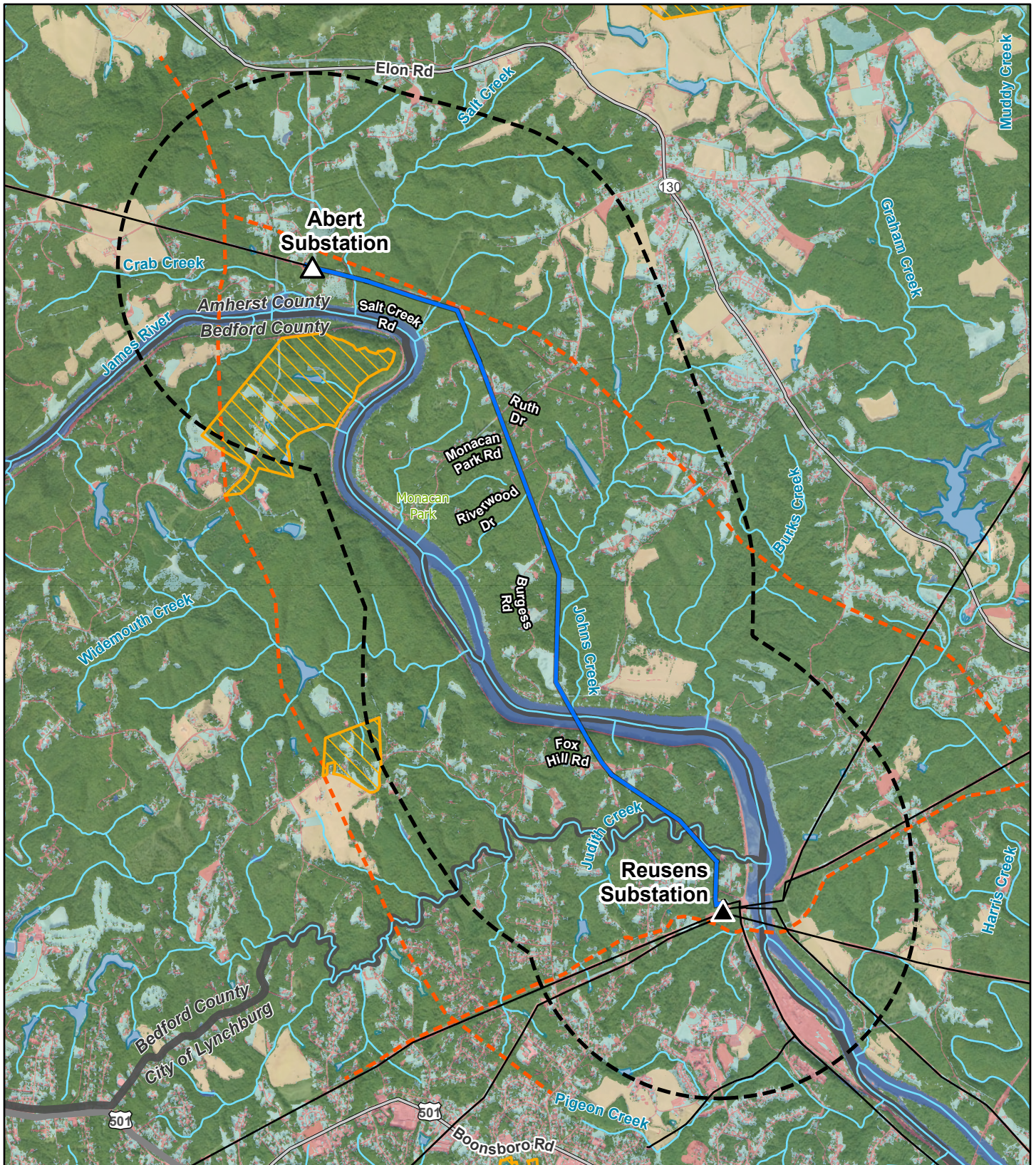


Map 5 Rebuild Route



Abert - Reusens Transmission
Improvements Project



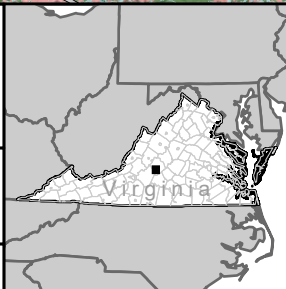


- ▲ Existing AEP Substation
- △ Existing AEP Substation to be Upgraded
- Rebuild Route
- Existing AEP Transmission Line
- Existing Natural Gas Line
- Study Area
- Stream (NHD)
- Waterbody (NHD)
- Conservation Easement (VDHR)
- Land Use/Land Cover (CB 2024)**
- Forested Land
- Agriculture
- Developed
- Open Land
- Water

Amherst and Bedford Counties,
City of Lynchburg
Virginia

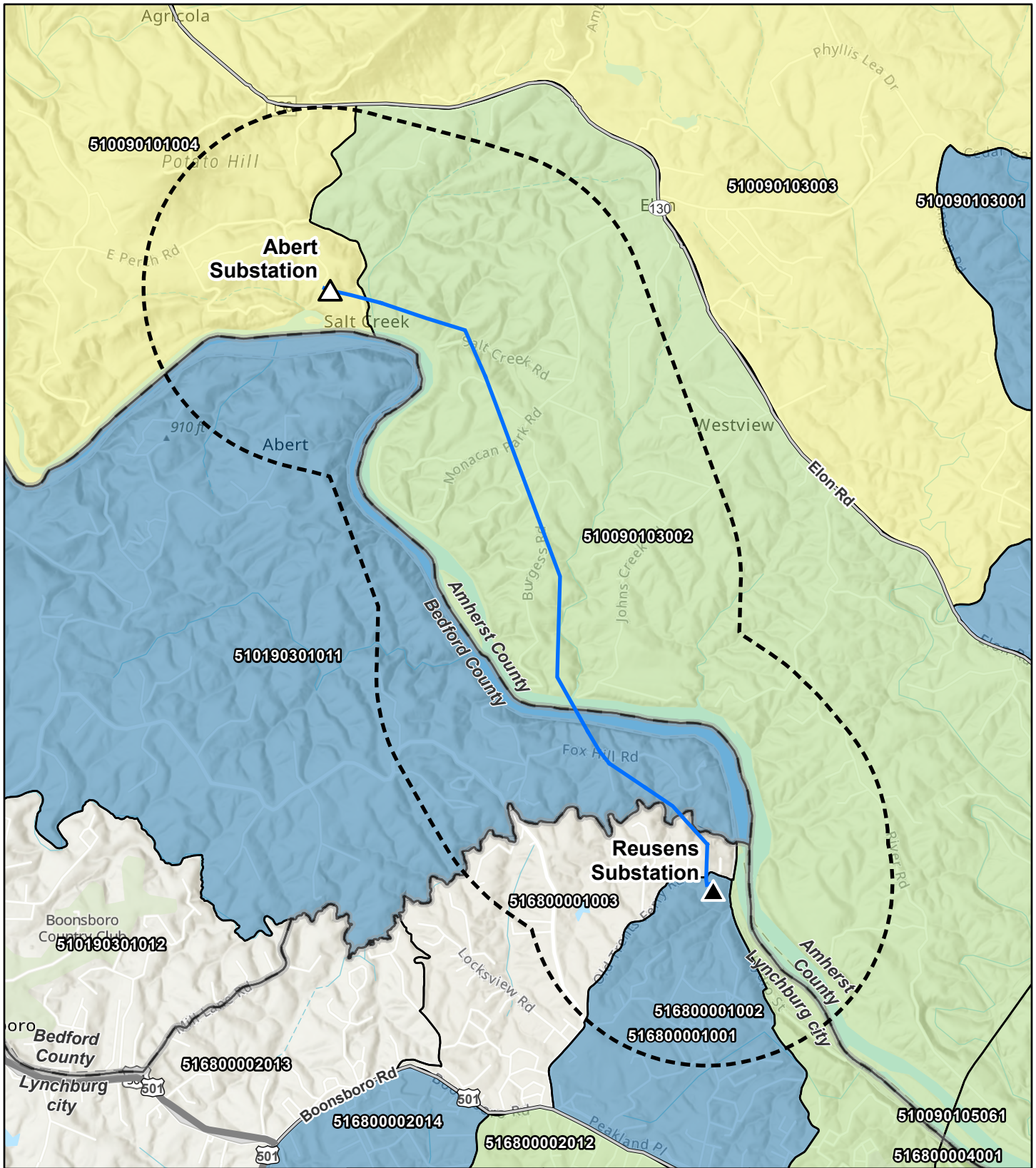
NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983

May 2026



Map 6
Human and Natural Environment

Abert - Reusens Transmission Improvements Project

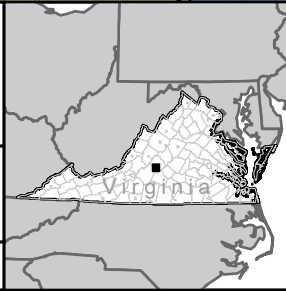


- ▲ Existing AEP Substation
- △ Existing AEP Substation to be Upgraded
- Rebuild Route
- Project Study Area (1-mile Buffer)
- Census Block Group Boundary
- Low Income Populations
- Populations of Color
- Populations of Color & Low Income Populations

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983

May 2026



Map 7
Census Block Groups

Abert - Reusens Transmission Improvements Project

0 0.25 0.5 0.75 1
Miles

Attachment C: GIS Data Sources

Attachment C: GIS Data Sources

Siting Criteria	Data Source	Description
Length	Measured in GIS	Length of route in miles
Length rebuilt in existing ROW	Measured in GIS	Length of route within existing ROW
Length rebuilt in new ROW (or near the existing ROW)	Measured in GIS	Length of route outside of existing ROW
Acreage of existing ROW	Measured in GIS	Acreage of existing ROW
Acreage of new ROW	Measured in GIS	Acreage of new ROW
Amherst County	Amherst County (2025)	Length of Project within Amherst County
Bedford County	Bedford County (2025)	Length of Project within Bedford County
City of Lynchburg	City of Lynchburg (2025)	Length of Project within the City of Lynchburg
Natural Environment		
Section 10 river crossing	USACE (2025)	Number of USACE Section 10 Waters crossed by the Project
Total streams crossed	National Hydrographic Dataset	Count of the number of NHD streams and waterbodies crossed by ROW
Forested wetlands (PFO) in the ROW	USFWS National Wetland Inventory	Count of the number of NWI streams and waterbodies crossed by ROW
PEM/PSS wetlands in the ROW	USFWS National Wetland Inventory	Count of the number of NWI streams and waterbodies crossed by ROW
Waterbody (lakes, rivers, etc.) crossings	USFWS National Wetland Inventory	Count of the number of NWI streams and waterbodies crossed by ROW
FEMA-designated floodplain crossed by ROW	U.S. Federal Emergency Management Agency (FEMA) (2008, 2010, 2025)	Acres of FEMA floodplain in the ROW
Prime and unique farmland soil in the ROW	NRCS SSURGO Soils	Acres of prime and unique farmland soils within the ROW
Farmland of statewide importance in the ROW	NRCS SSURGO Soils	Acres of farmland of statewide importance within the ROW
Forest Conservation Value (FCV) crossed by ROW	Chesapeake Bay LULC data (2024)	Acres of Forest Conservation crossed by ROW
VDCR Conservation Sites crossed in the ROW	VDCR (2025)	Acres of VDCR conservation sites crossed by ROW
VDCR Stream Conservation Sites crossed in the ROW	VDCR (2025)	Acres of VDCR stream conservation sites crossed by ROW

Siting Criteria	Data Source	Description
Predicted Suitable Habitat	Chesapeake Bay LULC data (2024)	Acres of predicted suitable habitat within ROW
Ecological Cores in the ROW	VDCR (2025)	Number of ecological cores within ROW
Designated natural areas within 250 feet of the ROW	VDCR (2025)	Number of designated natural areas within ROW
Eagle nests within 660 feet of the ROW	Center for Conservation Biology (2024)	Number of eagle nests within 660 feet of ROW
Human Environment		
Number of parcels crossed by ROW	Amherst County (2025); Bedford County (2025); City of Lynchburg (2025);	Number of parcels crossed by ROW
Unique landowners within ROW	Amherst County (2025); Bedford County (2025); City of Lynchburg (2025);	Number of unique landowners within ROW
Public land (federal/state/local) crossed by ROW	VDCR Virginia Outdoors Plan Mapper (2024); Virginia Outdoors Foundation	Acres of public lands crossed by ROW
Barns, outbuildings, sheds, garages and silos in the ROW (excludes abandoned features)	Amherst County (2025); Bedford County (2025); City of Lynchburg (2025)	Number of barns, outbuildings, sheds, garages and silos in ROW
Residences within ROW, 100 feet, 250 feet, and 500 feet of centerline	Amherst County (2025); Bedford County (2025); City of Lynchburg (2025); National Agriculture Imagery Program (NAIP) (2023)	Number of residences within ROW, 100 feet, 250 feet, and 500 feet of centerline
Businesses/commercial buildings within 500 feet of the centerline	Amherst County (2025); Bedford County (2025); City of Lynchburg (2025); NAIP (2023)	Number of commercial buildings and businesses within 500 feet of centerline
Pasture/rangeland crossed in ROW	Chesapeake Bay LULC data (2024)	Acres of pasture/rangeland within ROW
Cropland crossed in ROW	Chesapeake Bay LULC data (2024)	Acres of cropland within ROW
Agricultural Conservation easements crossed by ROW	VDCR	Acres of agricultural conservation easements within ROW

Siting Criteria	Data Source	Description
Schools within 1,000 feet of centerline	ESRI	Number of schools within the vicinity of the Project
Designated places of worship within 1,000 feet of centerline	ESRI	Number of places of worship within the vicinity of the Project
Cemeteries within ROW	Find A Grave (2026); VDHR VCRIS (2025); NPS National Register of Historic Places Dataset	Number of cemeteries within ROW
Cemeteries within 250 feet of centerline	VDHR VCRIS (2025) NPS National Register of Historic Places Dataset	Number of cemeteries within 250 feet of centerline
Hospitals and assisted living facilities within 250 feet of centerline	ESRI	Number of assisted living facilities within the vicinity of the Project
Parks and recreation areas within 500 feet of centerline	ESRI	Number of parks and recreational areas within 250 feet of centerline
Scenic byways crossed	VDCR: Virginia Outdoors Plan Mapper	Number of scenic byways crossed by the Project
Cultural Resources		
National Historic Landmarks within 1.5 miles off the centerline	VDHR VCRIS (2025) NPS National Register of Historic Places Dataset	Number of national historic landmarks within 1.5 miles of the centerline
NRHP-listed architectural resources within 1.0 mile of the centerline	VDHR VCRIS (2025) NPS National Register of Historic Places Dataset	Number of listed architectural resources within 1.0 mile of the centerline
NRHP-listed Historic Districts within one mile of the centerline	VDHR VCRIS (2025) NPS National Register of Historic Places Dataset	Number of listed historic districts resources within 1.0 mile of the centerline
NRHP-listed and -eligible architectural resources within 0.5 mile of the centerline	VDHR VCRIS (2025) NPS National Register of Historic Places Dataset	Number of listed and eligible architectural resources within 0.5 mile of the centerline
Archaeological sites within ROW	VDHR VCRIS (2025) NPS National Register of Historic Places Dataset	Number of archaeological resources within ROW
Constructability		
Interstate highways crossed	ESRI	Number of highways crossed by the Project

Siting Criteria	Data Source	Description
U.S. highways crossed	ESRI	Number of highways crossed by the Project
State highways crossed	ESRI	Number of highways crossed by the Project
Local roads and streets crossed	ESRI	Number of local roads and streets crossed by the Project
Railroads crossed	ESRI	Number of railroads crossed by the Project
Airports within one mile of the centerline	FAA Aviation Facility Dataset (2025)	Number of airports within one mile of the Project centerline
Oil and gas pipelines crossed	REXTAG; Columbia Gas (2025)	Number of oil and gas pipelines crossed by the Project
Oil and gas wells within 250 feet from edge of ROW	REXTAG; Columbia Gas (2025)	Number of oil and gas wells within 250 feet of the Project centerline
Communication towers, AM or FM radio towers within 1,000 feet of the centerline	HIFLD Communication Towers (2024)	Number of communication towers within 1,000 feet of the Project centerline
Existing Transmission Lines Crossed	REXTAG	Number of existing transmission lines crossed by the Project
Steep slopes crossed by ROW (>20%), percent of total length	Measured in GIS	Miles of steep slopes crossed by the Project
Heavy angles, greater than 30 degrees	Measured in GIS	Number of heavy angles along the centerline of the Project

Attachment D: Agency Correspondence

Abert - Reusens Transmission Improvements Project Agency Contact List

Jurisdiction	Last Name	First Name	Title	Organization	Telephone Number	Email Address	Street Address	Address 2	City	State	Zipcode
State	Schul	Hannah	Program Manager, Wildlife Information & Environmental Services	VA Department of Wildlife Resources (DWR) Environmental Services Section	(804) 367-1295	Hannah.Schul@dcwr.virginia.gov	7870 Villa Park Drive	Suite 400 (Villa Park 3)	Henrico	VA	23228
	Bulluck	Jason	Natural Heritage Director	VA Natural Heritage Program	(804) 796-8377	Jason.Bulluck@dcwr.virginia.gov	600 East Main Street	24th Floor	Richmond	VA	23219
	Ewins	Rob	Natural Area Protection Manager	VDCR Conservation and Recreation	(804) 371-6205	Rob.Ewins@dcwr.virginia.gov	600 East Main Street	24th Floor	Richmond	VA	23219
	Weid	Robert	Regional Director	Virginia DEQ - Blue Ridge Regional Office	(540) 562-6870	Robert.Weid@DEQ.Virginia.gov	901 Russell Drive		Salem	VA	24153
	Henrichack	Michelle	Senior Wetland Ecologist	Virginia DEQ - Central Office	(804) 965-4329	michelle.henrichack@deq.virginia.gov	1111 East Main Street	Suite 1400	Richmond	VA	23219
	Miller	Mark	Director, Environmental Impact Review	VDEQ - Office of Environmental Impact Review	(804) 658-4044	mark.miller@deq.virginia.gov	629 East Main Street		Richmond	VA	23219
	Fletcher	Timothy	Construction Stormwater/WMP Manager	Blue Ridge Regional Office	(540) 524-0665	timothy.fletcher@deq.virginia.gov	3019 Peters Creek Road		Roanoke	VA	24019
	Owen	Randy	Chief of Habitat Management	VMRC Habitat Management	(757) 247-2251	randy.owen@vmrc.virginia.gov	380 Fenwick Road	Building 96	Fort Monroe	VA	23651
	Umberger	Jules	Regional Supervisor	Virginia Department of Agriculture and Consumer Services - Southwest Region Office	(276) 228-5501	jules.umberger@vmrc.virginia.gov	250 Cassell Road		Wytheville	VA	24382
	Campbell	Gregory	Agency Director	Virginia Department of Aviation	(804) 774-4630	greg.campbell@doav.virginia.gov	5702 Gulfstream Road		Richmond	VA	23250
	Davis	Glenn	Deputy Field Director, Office of Drinking Water	Virginia Department of Mines, Minerals, and Energy	(804) 236-3638	glenn.davis@dmr.virginia.gov	1100 Bank Street, 8th Floor		Richmond	VA	23219
	Kwech	Steve	District Engineer	Virginia Department of Health - Lexington Field Office	(540) 463-7136	steve.kwech@vdh.virginia.gov	131 Walker Street		Lexington	VA	24450
	Windstead	Christopher	District Environmental Manager	Virginia Department of Transportation - Lynchburg District	(434) 856-8045	christopher.windstead@vdot.virginia.gov	4219 Campbell Avenue		Lynchburg	VA	24501
	Bradley	Kevin	District Environmental Manager	Virginia Department of Transportation - Lynchburg District	(434) 856-8288	kevin.bradley@vdot.virginia.gov	4219 Campbell Avenue		Lynchburg	VA	24501
	King	Ken	District Engineer	Virginia Department of Transportation - Salem District	(540) 387-5320	ken.king@vdot.virginia.gov	731 Harrison Avenue		Salem	VA	24153
	Simpson	Robin	District Environmental Manager	Virginia Department of Transportation - Salem District	(540) 387-5432	robin.simpson@vdot.virginia.gov	731 Harrison Avenue		Salem	VA	24153
	Henderson	Samantha	Director, Review & Compliance Division	Virginia Department of Historic Resources	(804) 482-6088	samantha.henderson@dhmr.virginia.gov	2801 Kensington Avenue		Richmond	VA	23221
Harris	Genny	Working Lands Conservation Coordinator	Virginia Department of Forestry - Central Region	(434) 282-4823	Gennette.Harris@def.virginia.gov	900 Natural Resources Drive	Suite 800	Charlottesville	VA	22903	
Little	Martha	Deputy Director of Conservation	Virginia Outdoors Foundation	(866) 863-9800	mlittle@vof.org	39 Garrett St., Suite 200		Warrenton	VA	20186	
Brebner	Alex	Executive Director	Central Virginia Planning District Commission	(434) 845-3491	communications@cvpdc.org	828 Main Street	12th Floor	Lynchburg	VA	24504	
Mitchell	Jordan	Director of Community Development	Bedford County Planning and Zoning	(540) 586-7616	N/A	122 East Main Street	Suite G-03	Bedford	VA	24523	
Hiss	Robert	County Administrator	Bedford County Administration	(540) 586-7601	rhiss@bedfordcountva.gov	122 East Main Street	Suite 202	Bedford	VA	24523	
Lawhorne	D.W.	Assistant County Administrator	Bedford County Administration	(540) 586-7601	dlawhorne@bedfordcountva.gov	122 East Main Street	Suite 202	Bedford	VA	24523	
Scott	Tommy	Chairman, 5th District	Bedford County Board of Supervisors	(434) 525-8400	tscott@bedfordcountva.gov	122 East Main Street	Suite 202	Bedford	VA	24523	
Cresay	Tyler	Director of Community Development	Amherst County Planning and Zoning	(434) 946-8903	tyler.cresay@countyofamherst.com	153 Washington St		Amherst	VA	24521	
Bryant	Jeremy	County Administrator	Amherst County Administration	(434) 946-9400	jbryant@countyofamherst.com	153 Washington St		Amherst	VA	24521	
Adams	Chris	Supervisor, District 3	Amherst County Board of Supervisors	N/A	cradams@countyofamherst.com	153 Washington St		Amherst	VA	24521	
Martin	Tom	Director of Community Development	City of Lynchburg Department of Community Development	(434) 455-3900	tom.martin@lynchburgva.gov	City Hall 900 Church St		Lynchburg	VA	24504	
Benda	Wynter	City Manager	City of Lynchburg City Manager's Office	434-455-3990	citymanager@lynchburgva.gov	City Hall 900 Church St		Lynchburg	VA	24504	
Timmer	Jacqueline	Ward 1 Councilmember	City of Lynchburg's City Council	(434) 291-3009	jacqueline.timmer@lynchburgva.gov	City Hall 900 Church St		Lynchburg	VA	24504	
Benson	Anna	Director of Communications & Public Engagement	City of Lynchburg Department of Communications & Public Engagement	(434) 455-3800	anna.benson@lynchburgva.gov	City Hall 900 Church St		Lynchburg	VA	24504	
Amherst County	Serfino	Jennifer	Chief, Western Section Regulatory Section	USACE - Norfolk District	(540) 344-1498	jennifer.j.serfino@usace.army.mil	808 Front Street		Norfolk	VA	23510
	Von Barrcom-Jockey	Amy	Regional Administrator	U.S. Environmental Protection Agency	(713) 814-6000	aj_vonbarrcom@epa.gov	1650 Arch Street		Philadelphia	PA	19103
	Anderson	Troy	Field Supervisor	USFWS - VA Ecological Services Field Office	(804) 728-6905	Troy.Anderson@fws.gov	6665 Short Lane		Gloucester	VA	23021
	Barnhope	Jennifer	Supervisory Fish & Wildlife Biologist	USFWS - VA Ecological Services Field Office	(804) 905-9781	jennifer.barnhope@fws.gov	6665 Short Lane		Gloucester	VA	23021
	Martinez	Edwin	State Conservationist	U.S. Department of Agriculture National Resources Conservation Service Virginia Division	(804) 287-1682	edwin.martinez@nrcs.usda.gov	1606 Santa Rosa Road	Suite 209	Richmond	VA	23229
Federal	Edward	Ofori	Division Administrator	USDOT - Federal Highway Administration, Virginia Division	(804) 775-3333	Virginia.FHWA@dot.gov	400 North 8th Street	Suite 750	Richmond	VA	23219
	Slaughter	Jeff	Manager	USDOT - FAA Flight Standards District Office Branch - Roanoke	(804) 222-7494	7-Alex.RTC.FSDO@faa.gov	5707 Huntsman Road	Richmond International Airport	Richmond	VA	23250
	Heron	Patricia	Manager	FAA Eastern Region Planning and Programming Branch - Roanoke	(713) 553-3335	patricia.heron@faa.gov	159-30 Rockaway Blvd		Jamaica	NY	11434
	Pierce	John	Environmental Program Manager	Monacan Indian Nation	(434) 363-8664	john@monacantribe.com	111 Highway Drive		Madison Heights	VA	24572



ERM

919 E Main Street
Suite 1701
Richmond, VA 23219

T +1 804 253 1090
F +1 612 347 6780

erm.com

Company Name
Contact name and title
Address 1
Address 2
City, State ZIP/Postcode

DATE

July 28, 2025

SUBJECT

Appalachian Power Company's Abert – Reusens Transmission Improvements Project in Amherst and Bedford Counties and the City of Lynchburg, Virginia

REFERENCE

0766900

Dear [Add name]:

Appalachian Power Company is proposing the Abert – Reusens Transmission Improvements Project (the Project) in Amherst and Bedford counties and the City of Lynchburg, Virginia. Appalachian Power Company contracted Environmental Resources Management (ERM) to conduct a siting study and prepare the Certificate of Public Convenience and Necessity application for filing the Project with the Virginia State Corporation Commission (SCC).

The Project will address electric reliability by rebuilding aging infrastructure. The existing Big Island – Reusens 69 kilovolt (kV) Transmission Line will be rebuilt between the Abert and Reusens substations (about 5 miles) in or near the existing right-of-way. Appalachian Power Company and ERM have identified a study area for the 69 kV transmission line to be rebuilt, as shown in Attachment 1.

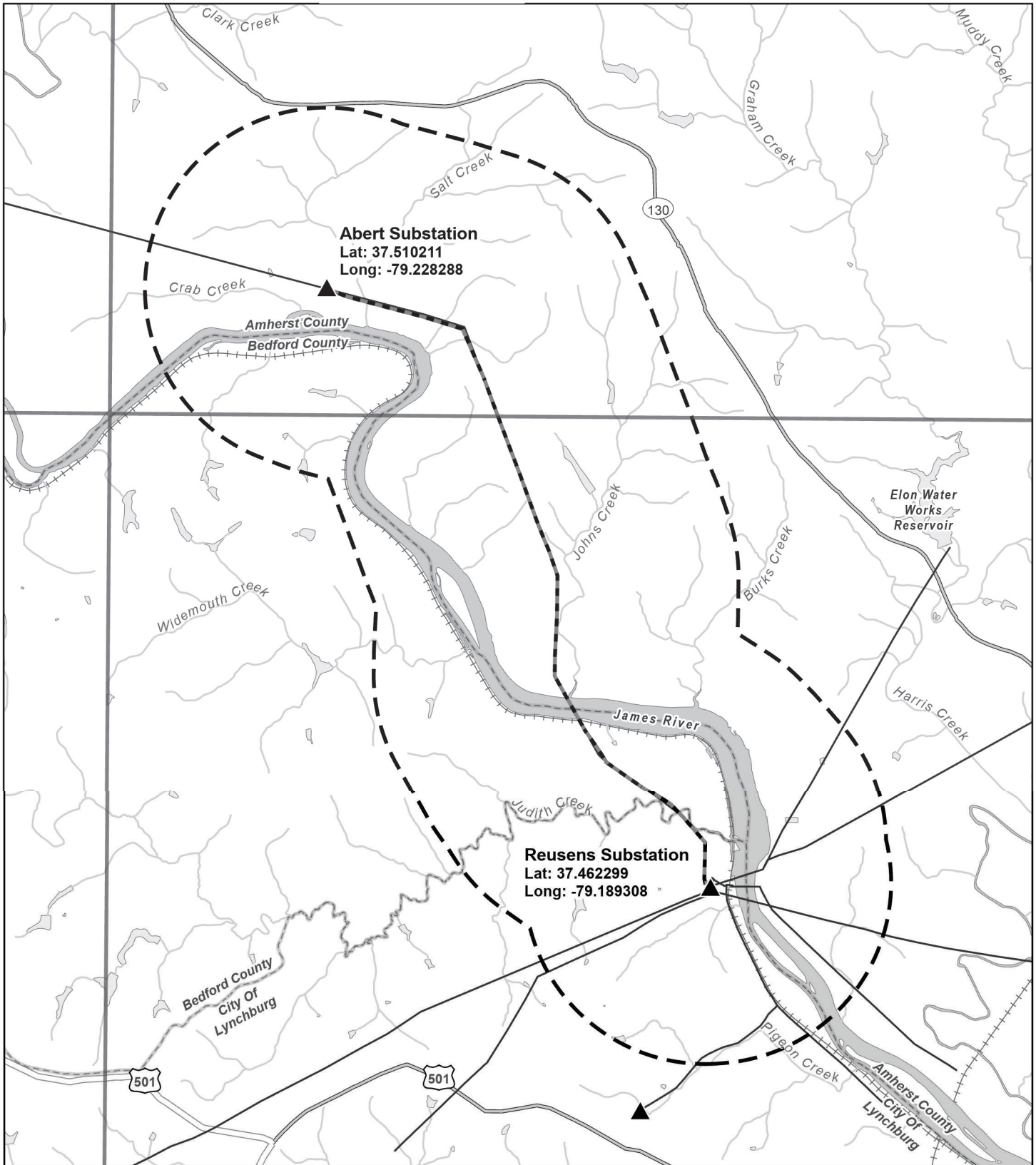
Appalachian Power Company is interested to know if your agency has any specific concerns about the Project. We appreciate your input and your comments will be incorporated into the filing with the SCC. Please distribute this notification to staff members who may be involved with this Project for review and comment.

Should you have questions, please contact me via email at roya.smith@erm.com or by phone at 804-783-7579.

Sincerely,

Roya Smith
Principal Consultant

Enclosure: Attachment 1: Project Study Area and Transmission Line to be Rebuilt

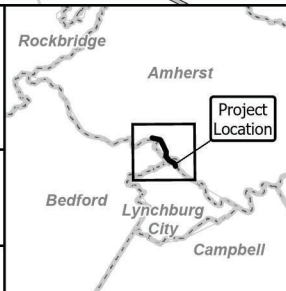


▲ Existing AEP Substation	— Highway
— Existing Transmission Line	— Major Road
- - - to be Rebuilt (in or near existing right-of-way)	— Railroads
— Existing Transmission Line	■ Lake/Pond (NHD)
▭ Study Area	■ Stream/River (NHD)
	▭ County Boundary
	▭ USGS 24k Topo Map Boundary

Amherst County,
Bedford County,
and City of Lynchburg
Virginia

NAD 1983 StatePlane Virginia
South FIPS 4502 Feet
North American 1983

July 2025



Attachment 1: Project Study Area and Transmission Line to be Rebuilt
Abert-Reusens Transmission Improvements Project

APPALACHIAN POWER
An AEP Company

ERM

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Miles

Patrick Tilley

From: Roya Smith
Sent: Monday, August 11, 2025 1:07 PM
To: Patrick Tilley
Subject: FW: [EXTERNAL] Appalachian Power Company - Abert-Reusens Transmission Improvements

Roya Smith
Principal Consultant
She/Her/Hers

Richmond erm.com
804 822 6659 (M)
804 783 7579 (T)

From: Virginia Field Office, FW5 <virginiafieldoffice@fws.gov>
Sent: Tuesday, August 5, 2025 2:58 PM
To: Roya Smith <roya.smith@erm.com>
Cc: Tim Ward <trward@aep.com>; Lionel Cruz-Cruz <lcruz-cruz@aep.com>; Tyler Q Emery <tqemery@aep.com>
Subject: Re: [EXTERNAL] Appalachian Power Company - Abert-Reusens Transmission Improvements

You don't often get email from virginiafieldoffice@fws.gov. [Learn why this is important](#)

EXTERNAL MESSAGE

Hi Roya,

Thank you for submitting the project titled Albert-Reusens Transmission Improvements to the U.S. Fish and Wildlife Service (Service) for review.

Please note that Federal interagency consultation under Section 7 of the Endangered Species Act (16 USC 1536), as amended, pursuant to 50 CFR 402.13 and 402.14, is conducted between the Service and a Federal action agency or their officially designated non-federal representative (per 50 CFR 402.08). If your intent is to initiate Section 7 consultation for this project, please provide confirmation from the Federal action agency or designated representative that they have reviewed your package and wish to initiate consultation with the Service using the information provided. Section 7 consultation is not complete until the Federal action agency or officially designated non-federal representative submits a determination of effects to this office, and the Service concurs with their determination. This requirement can be met by identifying and copying the POC for this project from the lead federal action agency (or NFR) on your response.

If you are only seeking technical assistance or scoping comments at this time, please follow our [online review process](#) to prepare a project package submittal for our review. Let me know if you have any questions. Thank you!

Best,
Jackie

From: Roya Smith <roya.smith@erm.com>

Sent: Thursday, July 31, 2025 9:51 AM

Cc: Tim Ward <trward@aep.com>; Lionel Cruz-Cruz <lcruz-cruz@aep.com>; Tyler Q Emery <tqemery@aep.com>

Subject: [EXTERNAL] Appalachian Power Company - Abert-Reusens Transmission Improvements

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello,

Appalachian Power Company recently announced its Abert-Reusens Transmission Improvements Project in Amherst and Bedford Counties and City of Lynchburg, Virginia.

The Company contracted Environmental Resources Management (ERM) to conduct a siting study and prepare the Certificate of Public Convenience and Necessity (CPCN) application for filing with the Virginia State Corporation Commission (SCC). The Project will address electric reliability by rebuilding aging 69 kV infrastructure. The existing Big Island – Reusens 69 kilovolt (kV) Transmission Line will be rebuilt between the existing Abert and Reusens substations (about 5 miles) in or near the existing right-of-way.

Attached to this email is a project area map, and a letter with map has also been mailed to you. Appalachian Power Company is interested to know if your agency has any specific concerns about the Project. We appreciate your input and your comments will be incorporated into the filing with the SCC. Please distribute this notification to staff members who may be involved with this Project for review and comment.

Should you have any questions, please feel free to contact me via email at roya.smith@erm.com or by phone at 804-783-7579.

Thank you,



Sustainability is our business

Roya Smith
Principal Consultant
She/Her/Hers

Richmond

erm.com

Patrick Tilley

From: Roya Smith
Sent: Monday, August 11, 2025 1:08 PM
To: Patrick Tilley
Subject: FW: Appalachian Power Company - Abert-Reusens Transmission Improvements
Attachments: AEP_Abert-Reusens_Agency Attachment 1 Map_07-2025.pdf

Roya Smith
Principal Consultant
She/Her/Hers

Richmond erm.com
804 822 6659 (M)
804 783 7579 (T)

From: Willson, Matthew <Willson.Matthew@epa.gov>
Sent: Thursday, August 7, 2025 2:39 PM
To: Roya Smith <roya.smith@erm.com>
Cc: trward@aep.com; lcruz-cruz@aep.com; tqemery@aep.com
Subject: RE: Appalachian Power Company - Abert-Reusens Transmission Improvements

You don't often get email from willson.matthew@epa.gov. [Learn why this is important](#)

EXTERNAL MESSAGE

Good Afternoon,

Thank you for your July 31, 2025 email and attachment regarding Appalachian Power Company's Abert-Reusens Transmission Improvements Project, in Amherst and Bedford Counties, and City of Lynchburg, Virginia. I am a NEPA reviewer for EPA and am responding on behalf of EPA region 3. It is unclear from your letter if NEPA applies to this project. Please explain what type of review you are asking for, under what regulatory context and when you would like to receive feedback. In your response, please let us know if this project is subject to NEPA under 42 U.S.C. §4321.

Please note that EPA Region 3's NEPA program has a new way to receive NEPA documents (e.g. NOI, EA, pre NEPA technical reports) electronically to our office.

Please use R3NEPA@epa.gov to submit these types of NEPA documents to Region 3.

Thank you,

Matthew Willson
NEPA Specialist- NEPA & Technical Assistance Branch
EPA Region 3 Philadelphia, PA
Phone: 215-814-5795
Email: willson.matthew@epa.gov
Cube: 20630

Please submit NEPA documents for EPA Region 3 review to R3NEPA@epa.gov

From: Roya Smith <roya.smith@erm.com>

Sent: Thursday, July 31, 2025 9:52 AM

Cc: Tim Ward <trward@aep.com>; Lionel Cruz-Cruz <lcruz-cruz@aep.com>; Tyler Q Emery <tgemery@aep.com>

Subject: Appalachian Power Company - Abert-Reusens Transmission Improvements

You don't often get email from roya.smith@erm.com. [Learn why this is important](#)

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello,

Appalachian Power Company recently announced its Abert-Reusens Transmission Improvements Project in Amherst and Bedford Counties and City of Lynchburg, Virginia.

The Company contracted Environmental Resources Management (ERM) to conduct a siting study and prepare the Certificate of Public Convenience and Necessity (CPCN) application for filing with the Virginia State Corporation Commission (SCC). The Project will address electric reliability by rebuilding aging 69 kV infrastructure. The existing Big Island – Reusens 69 kilovolt (kV) Transmission Line will be rebuilt between the existing Abert and Reusens substations (about 5 miles) in or near the existing right-of-way.

Attached to this email is a project area map, and a letter with map has also been mailed to you. Appalachian Power Company is interested to know if your agency has any specific concerns about the Project. We appreciate your input and your comments will be incorporated into the filing with the SCC. Please distribute this notification to staff members who may be involved with this Project for review and comment.

Should you have any questions, please feel free to contact me via email at roya.smith@erm.com or by phone at 804-783-7579.

Thank you,



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Roya Smith
Principal Consultant
She/Her/Hers

Richmond

erm.com



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

www.deq.virginia.gov

Stefanie K. Taillon
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director

August 8, 2025

Roya Smith
ERM
Via email: roya.smith@erm.com

RE: Appalachian Power Company - Abert-Reusens Transmission Improvements, Amherst and Bedford Counties and City of Lynchburg, Virginia, Scoping Response

Dear Ms. Smith:

This letter is in response to the scoping request for the above-referenced project.

As you may know, the Department of Environmental Quality, through its Office of Environmental Impact Review (DEQ-OEIR), is responsible for coordinating Virginia's review of environmental impacts for electric power generating projects and power line projects in conjunction with the licensing process of the State Corporation Commission.

DOCUMENT SUBMISSIONS

In order to ensure an effective coordinated review of the environmental impact analysis may be sent directly to OEIR. We request that you submit one electronic to eir@deq.virginia.gov (25 MB maximum) or make the documents available for download at a website, file transfer protocol (ftp) site or the VITA LFT file share system (Requires an "invitation" for access. An invitation request should be sent to eir@deq.virginia.gov). The required "Wetlands Impact Consultation" can be sent directly to Michelle Henicheck at michelle.henicheck@deq.virginia.gov or at the address above.

ENVIRONMENTAL REVIEW UNDER VIRGINIA CODE 56-46.1

While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the environmental impact analysis document. Accordingly, we have coordinated your request with the following state agencies and those localities and Planning District Commissions, including but not limited to:

- Department of Environmental Quality:
- DEQ Regional Office

- Air Division
- Office of Wetlands and Stream Protection
- Office of Local Government Programs
- Division of Land Protection and Revitalization
- Office of Stormwater Management
- Office of Environmental Justice

Department of Conservation and Recreation

Department of Health

Department of Agriculture and Consumer Services

Department of Wildlife Resources

Virginia Marine Resources Commission

Department of Historic Resources

Virginia Energy

Department of Forestry

Department of Transportation

DATA BASE ASSISTANCE

Below is a list of databases that may assist you in the preparation of a NEPA document:

- DEQ Online Database: Virginia Environmental Geographic Information Systems Information on Permitted Solid Waste Management Facilities, Impaired Waters, Petroleum Releases, Registered Petroleum Facilities, Permitted Discharge (Virginia Pollution Discharge Elimination System Permits) Facilities, Resource Conservation and Recovery Act (RCRA) Sites, Water Monitoring Stations, National Wetlands Inventory:

- www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx

- DEQ Virginia Coastal Geospatial and Educational Mapping System (GEMS) Virginia's coastal resource data and maps; coastal laws and policies; facts on coastal resource values; and direct links to collaborating agencies responsible for current data:

- https://www.deq.virginia.gov/?splash=https%3a%2f%2fgaia.vcu.edu%2fportal%2fapps%2fsites%2f%23%2fgemsmaps&__isexternal=true

- MARCO Mid-Atlantic Ocean Data Portal

The Mid-Atlantic Ocean Data Portal is a publicly available online toolkit and resource center that consolidates available data and enables users to visualize and analyze ocean resources and human use information such as fishing grounds, recreational areas, shipping lanes, habitat areas, and energy sites, among others.

- <http://portal.midatlanticocean.org/visualize/#x=-73.24&y=38.93&z=7&logo=true&controls=true&basemap=Ocean&tab=data&legends=false&layers=true>

- DHR Data Sharing System.

Survey records in the DHR inventory:

- www.dhr.virginia.gov/archives/data_sharing_sys.htm

- DCR Natural Heritage Search

Produces lists of resources that occur in specific counties, watersheds or physiographic regions:

- www.dcr.virginia.gov/natural_heritage/dbsearchtool.shtml

- Wetland Condition Assessment Tool (WetCAT)

- <https://www.deq.virginia.gov/our-programs/water/wetlands-streams/wetcat>

- DWR Fish and Wildlife Information Service

Information about Virginia's Wildlife resources:

- <http://vafwis.org/fwis/>

- Total Maximum Daily Loads Approved Reports

- <https://www.deq.virginia.gov/programs/water/waterqualityinformationtmdls/tmdl/tmdldevelopment/approvedtmdlreports.aspx>

- Virginia Outdoors Foundation: Identify VOF-protected land

- <http://vof.maps.arcgis.com/home/index.html>

- Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Database: Superfund Information Systems Information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation, including sites that are on the National Priorities List (NPL) or being considered for the NPL:

- www.epa.gov/superfund/sites/cursites/index.htm

- EPA RCRAInfo Search

Information on hazardous waste facilities:

- www.epa.gov/enviro/facts/rcrainfo/search.html

- Total Maximum Daily Loads Approved Reports

- <https://www.deq.virginia.gov/our-programs/water/water-quality/tmdl-development/approved-tmdls>

- EPA Envirofacts Database

EPA Environmental Information, including EPA-Regulated Facilities and Toxics Release Inventory Reports:

- www.epa.gov/enviro/index.html

- EPA NEPAassist Database

Facilitates the environmental review process and project planning:

<http://nepaassisttool.epa.gov/nepaassist/entry.aspx>

If you have questions about the environmental review process, please feel free to contact me. I hope this information is helpful to you.

Sincerely,

A handwritten signature in black ink that reads "Bettina Rayfield". The signature is written in a cursive, flowing style.

Bettina Rayfield, Program Manager
Environmental Impact Review and Long Range Priorities
Virginia Department of Environmental Quality
804-659-1915
bettina.rayfield@DEQ.virginia.gov
Central Office
1111 E. Main Street, Suite 1400
Richmond, Virginia 23219
804-698-4000

Patrick Tilley

From: Roya Smith
Sent: Monday, August 11, 2025 1:07 PM
To: Patrick Tilley
Subject: FW: Appalachian Power Company - Abert-Reusens Transmission Improvements

Roya Smith
Principal Consultant
She/Her/Hers

Richmond erm.com
804 822 6659 (M)
804 783 7579 (T)

From: Strawderman, Nicole (DWR) <Nicole.Strawderman@dwr.virginia.gov>
Sent: Tuesday, August 5, 2025 9:57 AM
To: Roya Smith <roya.smith@erm.com>; trward@aep.com; lcruz-cruz@aep.com; tqemery@aep.com
Subject: RE: Appalachian Power Company - Abert-Reusens Transmission Improvements

You don't often get email from nicole.strawderman@dwr.virginia.gov. [Learn why this is important](#)

EXTERNAL MESSAGE

Good morning,

Thank you for contacting us about your project. Due to staffing limitations, we are unable to review and provide comments on projects that are not currently involved in one of the regulatory review processes for which we are a formal consulting agency (see <https://www.DWR.virginia.gov/environmental-programs/>). If your project becomes involved in one of these review processes, we will review the project at that time and provide our comments to the requesting agency. In advance of that, we recommend that you conduct a preliminary desktop analysis to evaluate your project's potential impacts upon the Commonwealth's wildlife resources by accessing our online information system, the Virginia Fish and Wildlife Information Service (VAFWIS) and using the **Geographic Search** function to generate an **Initial Project Assessment** (IPA) report.

We recommend the following steps:

- A. Access VAFWIS at this link: <https://vafwis.DWR.virginia.gov/fwis/>
If you are not already a VAFWIS subscriber, you should request to become one by emailing a request to VAFWIS_support@DWR.virginia.gov. VAFWIS Subscriptions are free of charge. As a subscriber, one is able to generate an IPA for the project area (project site plus a minimum 2-mile buffer) which generates a list of imperiled wildlife and designated wildlife resources known from the project area. You may also access VAFWIS as a visitor, but access to data and mapping at this user level is restricted.

Alternatively, you may contact our Geographic Information Systems (GIS) staff at GIS@dwr.virginia.gov to request access to the Wildlife Mapping and Environmental Review Map Service (WERMS) which allows you to download GIS data into your own system.

- B. Access information about the location of northern long-eared bat, tri-colored bat and little brown bat hibernacula, roost, and consultation range data here:
<https://dwr.virginia.gov/wildlife/bats/northern-long-eared-bat-tri-colored-bat-and-little-brown-bat-consultation-tool/>
- C. Access up to date information about the location and status of bald eagle nests in Virginia by accessing the Center for Conservation Biology’s Eagle Nest Locator at <https://ccbbirds.org/what-we-do/research/species-of-concern/virginia-eagles/nest-locator/>
- D. Review the DWR information, guidance, and protocols available on our website at the bottom of [this page](#) in the “Additional Resources” section and implement, as appropriate.
- E. Include the results of your desktop analysis with your project documents, applications, etc.

Thank you,
Nicole



Nicole Strawderman

(she/her)

Environmental Services Project Review Assistant

P 804-367-2211

Virginia Department of Wildlife Resources

A 7870 Villa Park Drive, P.O. Box 90778, Henrico, VA 23228

www.dwr.virginia.gov

From: Roya Smith <roya.smith@erm.com>

Sent: Thursday, July 31, 2025 9:51 AM

Cc: Tim Ward <trward@aep.com>; Lionel Cruz-Cruz <lcruz-cruz@aep.com>; Tyler Q Emery <tqemery@aep.com>

Subject: Appalachian Power Company - Abert-Reusens Transmission Improvements

Hello,

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your input and your comments will be incorporated into the filing with the SCC. Please distribute this notification to staff members who may be involved with this Project for review and comment.

Should you have any questions, please feel free to contact me via email at roya.smith@erm.com or by phone at 804-783-7579.

Thank you,



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Roya Smith
Principal Consultant
She/Her/Hers

Richmond

erm.com

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Patrick Tilley

From: Roya Smith
Sent: Monday, August 11, 2025 1:06 PM
To: Patrick Tilley
Subject: FW: Appalachian Power Company - Abert-Reusens Transmission Improvements

Roya Smith
Principal Consultant
She/Her/Hers

Richmond erm.com
804 822 6659 (M)
804 783 7579 (T)

From: Fletcher, Timothy (DEQ) <Timothy.Fletcher@deq.virginia.gov>
Sent: Monday, August 11, 2025 12:52 PM
To: Roya Smith <roya.smith@erm.com>
Subject: Re: Appalachian Power Company - Abert-Reusens Transmission Improvements

EXTERNAL MESSAGE

Roya,

I've asked staff that will most likely be involved in this project and we do not have any comments. Thank you for the chance to review.

Tim Fletcher



Stormwater/VWP/MS4 Program Manager

Blue Ridge Regional Office

[Virginia Dept. of Environmental Quality](#)

901 Russell Dr., Salem, VA 24153
Cell: 540.524.0665

From: Roya Smith <roya.smith@erm.com>
Sent: Thursday, July 31, 2025 9:51 AM
Cc: Tim Ward <trward@aep.com>; Lionel Cruz-Cruz <lcruz-cruz@aep.com>; Tyler Q Emery <tqemery@aep.com>
Subject: Appalachian Power Company - Abert-Reusens Transmission Improvements

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Hello,

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Should you have any questions, please feel free to contact me via email at roya.smith@erm.com or by phone at 804-783-7579.

Thank you,



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Roya Smith
Principal Consultant
She/Her/Hers

Richmond

erm.com

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Patrick Tilley

From: ImpactReview <impactreview@vof.org>
Sent: Tuesday, August 12, 2025 12:21 PM
To: Roya Smith; ImpactReview; Fulcher, Valerie (DEQ)
Cc: Patrick Tilley; Martha Little
Subject: RE: NEW SCOPING Abert-Reusens Transmission Improvements Project

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from impactreview@vof.org. [Learn why this is important](#)

EXTERNAL MESSAGE

Hi Roya,

The Virginia Outdoors Foundation has reviewed the project referenced below. As of August 12, 2025, it appears that this project will not encroach on any existing nor proposed VOF open-space easements.

Please contact VOF again for further review if the project area changes or if this project does not begin within 24 months. Thank you for considering conservation easements.

Best,
Baron

Baron Lin
GIS Specialist
[Virginia Outdoors Foundation](#)
cell: 540-935-3163
other work #: 844-863-9800, ext. 355
email: blin@vof.org

From: Roya Smith <roya.smith@erm.com>
Sent: Tuesday, August 12, 2025 10:35 AM
To: ImpactReview <impactreview@vof.org>; Fulcher, Valerie (DEQ) <Valerie.Fulcher@deq.virginia.gov>
Cc: Patrick Tilley <patrick.tilley@erm.com>
Subject: RE: NEW SCOPING Abert-Reusens Transmission Improvements Project

Alert: This email originated from outside VOF
Hi Baron,

Thanks for reaching back out. I was out last week and still catching up!

Please see the attached KMZ. Could you also provide feedback on any planned/potential easements in or near the Project?

Thank you for your time and please let me know if there's anything else I can provide for your initial review.



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Roya Smith
Principal Consultant
She/Her/Hers

Richmond erm.com
804 822 6659 (M)
804 783 7579 (T)

From: ImpactReview <impactreview@vof.org>
Sent: Tuesday, August 12, 2025 8:20 AM
To: Fulcher, Valerie (DEQ) <Valerie.Fulcher@deq.virginia.gov>; Roya Smith <roya.smith@erm.com>
Subject: RE: NEW SCOPING Abert-Reusens Transmission Improvements Project

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EXTERNAL MESSAGE

Hi Roya,

Could you please share any GIS data regarding this project? Any geodatabases/shapefiles, etc will help us with our review.

Thanks,
Baron

Baron Lin
GIS Specialist
[Virginia Outdoors Foundation](http://VirginiaOutdoorsFoundation.org)
cell: 540-935-3163
other work #: 844-863-9800, ext. 355
email: blin@vof.org

From: Fulcher, Valerie (DEQ) <Valerie.Fulcher@deq.virginia.gov>
Sent: Friday, August 8, 2025 1:44 PM
To: Harlow, Kevin (DEQ) <Kevin.Harlow@deq.virginia.gov>; jsbryant@countyofamherst.com;
rhiss@bedfordcountyva.gov; Wynter C. Benda <wynter.benda@lynchburgva.gov>; Alec Brener
<alec.brebner@cvpdc.org>; dgif-ESS Projects (DWR) <ESSProjects@dwr.virginia.gov>; Tignor, Keith (VDACS)
<Keith.Tignor@vdacs.virginia.gov>; DCR-PRR Environmental Review (DCR) <envreview@dcr.virginia.gov>; odwreview
(VDH) <odwreview@vdh.virginia.gov>; Churchill, Nikolas (DEQ) <Nikolas.Churchill@deq.virginia.gov>; Lovain, Ava (DEQ)
<Anna.Lovain@deq.virginia.gov>; Frantz, Allyson (DEQ) <Allyson.B.Frantz@deq.virginia.gov>; Angueira, Antony (DEQ)
<Antony.Angueira@deq.virginia.gov>; Heller, Matthew (Energy) <matt.heller@energy.virginia.gov>; ImpactReview
<impactreview@vof.org>; Folks, Clint (DOF) <Clint.Folks@dof.virginia.gov>; EIR Coordination (VDOT)
<EIR.Coordination@vdot.virginia.gov>; Henicheck, Michelle (DEQ) <Michelle.Henicheck@deq.virginia.gov>
Cc: roya.smith@erm.com
Subject: NEW SCOPING Abert-Reusens Transmission Improvements Project

Alert: This email originated from outside VOF

Good afternoon—attached is a request for scoping comments on the following:

Appalachian Power Company's Abert-Reusens Transmission Improvements Project in Amherst and Bedford Counties and the City of Lynchburg (Ref. # 0766900)

If you choose to make comments, please send them directly to the project sponsor (roya.smith@erm.com). DEQ-OEIR will coordinate a review when the environmental document is completed.

DEQ-OEIR's scoping response is also attached.

If you have any questions regarding this request, please email our office at eir@deq.virginia.gov.

Valerie

**Valerie A. Fulcher, CAP, OM, Admin/Data Coordinator Senior
Department of Environmental Quality
Environmental Enhancement - Office of Environmental Impact Review
1111 East Main Street
Richmond, VA 23219**

PHONE NUMBER: 804-659-1550

Email: Valerie.Fulcher@deq.virginia.gov

<https://www.deq.virginia.gov/permits-regulations/environmental-impact-review>

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COMMONWEALTH of VIRGINIA

Marine Resources Commission
380 Fenwick Road
Building 96
Fort Monroe, VA 23651

Stefanie K. Taillon
Secretary of Natural
and Historic Resources

Jamie L. Green
Commissioner

August 20, 2025

ERM
Attn: Roya Smith
919 E Main Street, Suite 1701
Richmond, VA 23219

Re: Abert-Reusens Transmission Improvements Project,
Scoping Comment

Dear Ms. Smith:

This will respond to the request for comments regarding the Scoping Comment for the Abert-Reusens Transmission Improvements Project, prepared by ERM, on behalf of Appalachian Power Company. Specifically, the Appalachian Power Company has proposed to rebuild approximately 5-miles of aging electrical distribution infrastructure in Amherst and Bedford Counties and the City of Lynchburg, Virginia.

We reviewed the provided project documents and found the proposed project is within the jurisdictional areas of the Virginia Marine Resources Commission (VMRC) and will require a permit from this agency for encroachments over State-owned submerged lands.

Please be advised that the VMRC, pursuant to §28.2-1200 et seq of the Code of Virginia, has jurisdiction over encroachments in, on, or over the beds of the bays, ocean, rivers, streams, or creeks which are the property of the Commonwealth. Accordingly, if any portion of the subject project involves any encroachments channelward of ordinary high water along non-tidal, natural rivers and streams with a drainage area greater than 5-square miles, a permit may be required from our agency or the Department of Environmental Quality. Any jurisdictional impacts will be reviewed by the VMRC during the JPA process.

Please contact me at (757) 247-8032 or by email at kylie.harris@mrc.virginia.gov if you have any questions. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads 'Kylie Harris'.

Kylie Harris
Environmental Engineer, Habitat Management

An Agency of the Natural and Historic Resources Secretariat

www.mrc.virginia.gov

Telephone (757) 247-2200 Information and Emergency Hotline 1-800-541-4646

Patrick Tilley

From: Roya Smith
Sent: Monday, August 25, 2025 6:40 PM
To: Patrick Tilley
Subject: Fw: NEW SCOPING Abert-Reusens Transmission Improvements Project

From: Warren, Arlene (VDH) <Arlene.Warren@vdh.virginia.gov>
Sent: Monday, August 25, 2025 3:23:07 PM
To: Roya Smith <roya.smith@erm.com>
Subject: RE: NEW SCOPING Abert-Reusens Transmission Improvements Project

You don't often get email from arlene.warren@vdh.virginia.gov. [Learn why this is important](#)

EXTERNAL MESSAGE

Project: N/A
Project Name: SCOPING Abert-Reusens Transmission Improvements Project
UPC #: N/A
Location: Amherst & Bedford Counties & City of Lynchburg

VDH – Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to public drinking water sources (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

There are no public groundwater wells within a 1-mile radius of the project site.

The following surface water intakes are located within a 5-mile radius of the project site:

PWS ID Number	System Name	Facility Name
5680200	LYNCHBURG, CITY OF	JAMES RIVER-ABERT
5680200	LYNCHBURG, CITY OF	ABERT COMBINED INTAKE - SAMPLING
5680200	LYNCHBURG, CITY OF	COLLEGE HILL COMBINED INTAKE - SAMPLING
5680200	LYNCHBURG, CITY OF	JAMES RIVER-COLLEGE HILL
5019250	EAGLE EYRIE BAPTIST CONFERENCE CENTER	INTAKE - FLEMING MT RESERVOIR
5009250	AMHERST CO SERVICE AUTHORITY (ACSA)	GRAHAM CREEK IMPOUNDMENT
5009250	AMHERST CO SERVICE AUTHORITY (ACSA)	HARRIS CREEK AUX INTAKE

The project is within the watershed of the following public surface water sources (facilities where the project falls within 5-miles of the intake and is within the intake's watershed are formatted in bold):

PWS ID Number	System Name	Facility Name
5680200	LYNCHBURG, CITY OF	JAMES RIVER-ABERT
5680200	LYNCHBURG, CITY OF	JAMES RIVER-COLLEGE HILL
5680200	LYNCHBURG, CITY OF	JAMES RIVER-ABERT

Best Management Practices should be employed, including Erosion & Sedimentation Controls and Spill Prevention Controls & Countermeasures on the project site.

Materials should be managed while on site and during transport to prevent impacts to nearby surface water.

The Virginia Department of Health – Office of Drinking Water appreciates the opportunity to provide comments. If you have any questions, please let me know.

Best Regards,

Arlene F. Warren

GIS Program Support Technician

Mobile 804-389-2167 (office/cell/text)

Email arlene.warren@vdh.virginia.gov

VDH, Office of Drinking Water

109 Governor Street, 6th Floor

Richmond, VA 23219

From: Fulcher, Valerie (DEQ) <Valerie.Fulcher@deq.virginia.gov>

Sent: Friday, August 8, 2025 1:44 PM

To: Harlow, Kevin (DEQ) <Kevin.Harlow@deq.virginia.gov>; jsbryant@countyofamherst.com;

rhiss@bedfordcountyva.gov; Wynter C. Benda <wynter.benda@lynchburgva.gov>; Alec Brener

<alec.brebner@cvpdc.org>; dgif-ESS Projects (DWR) <ESSProjects@dwr.virginia.gov>; Tignor, Keith (VDACS)

<Keith.Tignor@vdacs.virginia.gov>; DCR-PRR Environmental Review (DCR) <envreview@dcr.virginia.gov>; odwreview

(VDH) <odwreview@vdh.virginia.gov>; Churchill, Nikolas (DEQ) <Nikolas.Churchill@deq.virginia.gov>; Lovain, Ava (DEQ)

<Anna.Lovain@deq.virginia.gov>; Frantz, Allyson (DEQ) <Allyson.B.Frantz@deq.virginia.gov>; Angueira, Antony (DEQ)

<Antony.Angueira@deq.virginia.gov>; Heller, Matthew (Energy) <matt.heller@energy.virginia.gov>; ImpactReview

<impactreview@vof.org>; Folks, Clint (DOF) <Clint.Folks@dof.virginia.gov>; EIR Coordination (VDOT)

<EIR.Coordination@vdot.virginia.gov>; Henicheck, Michelle (DEQ) <Michelle.Henicheck@deq.virginia.gov>

Cc: roya.smith@erm.com

Subject: NEW SCOPING Abert-Reusens Transmission Improvements Project

Good afternoon—attached is a request for scoping comments on the following:

Appalachian Power Company's Abert-Reusens Transmission Improvements Project in Amherst and Bedford Counties and the City of Lynchburg (Ref. # 0766900)

If you choose to make comments, please send them directly to the project sponsor (roya.smith@erm.com). DEQ-OEIR will coordinate a review when the environmental document is completed.

DEQ-OEIR's scoping response is also attached.

If you have any questions regarding this request, please email our office at eir@deq.virginia.gov.

Valerie

Valerie A. Fulcher, CAP, OM, Admin/Data Coordinator Senior
Department of Environmental Quality
Environmental Enhancement - Office of Environmental Impact Review
1111 East Main Street
Richmond, VA 23219

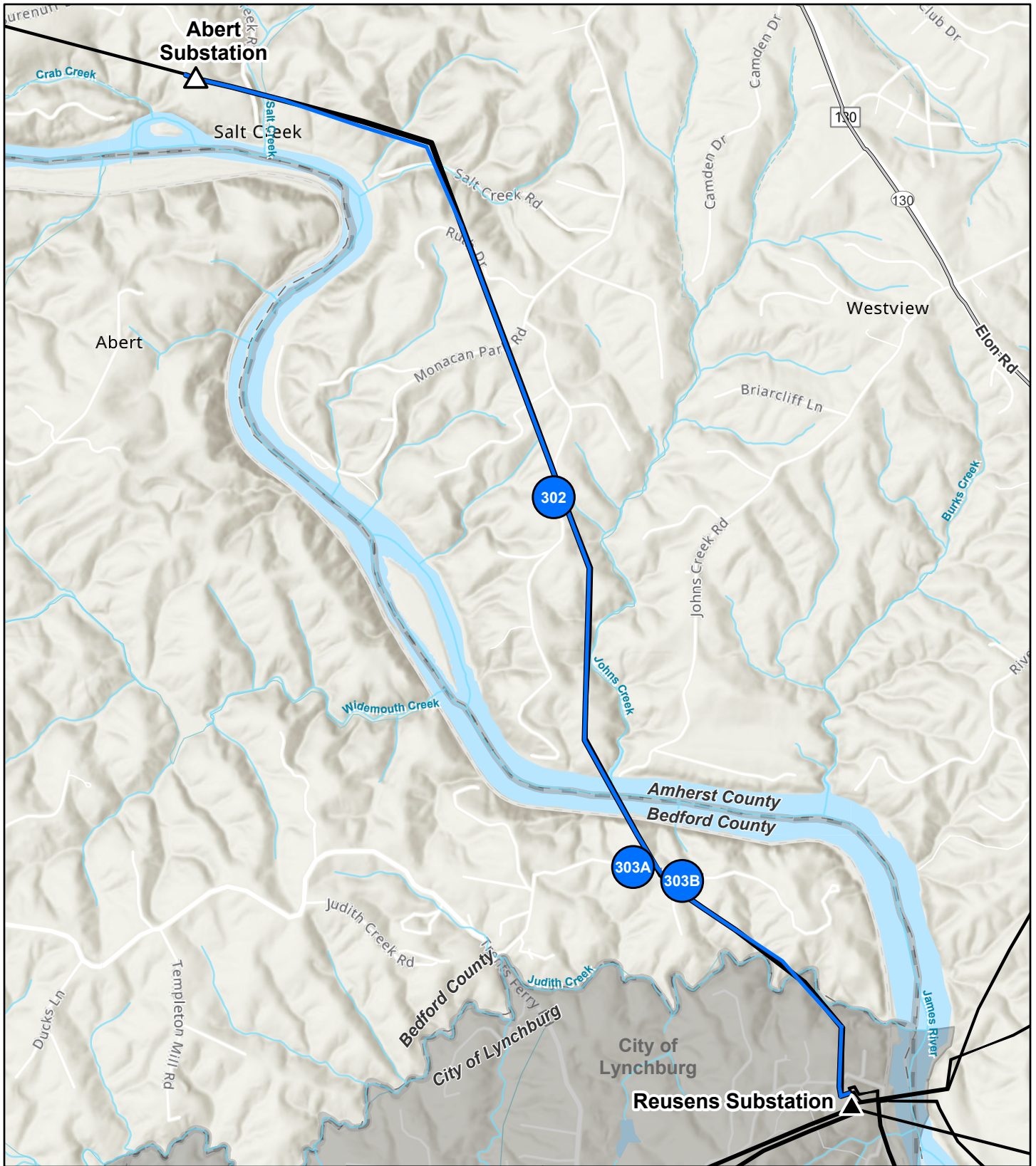
PHONE NUMBER: 804-659-1550

Email: Valerie.Fulcher@deq.virginia.gov

<https://www.deq.virginia.gov/permits-regulations/environmental-impact-review>

For program updates and public notices please subscribe to the Environmental Impact Review Public Notices Bulletin: <https://public.govdelivery.com/accounts/VADEQ/subscriber/new>

Attachment E: Visual Simulations



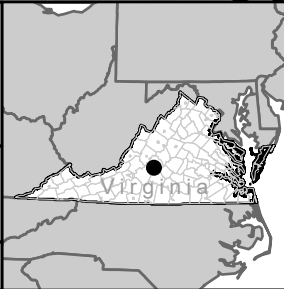
- KOP Location
- ▲ Existing AEP Substation
- ▴ Existing AEP Substation to be Upgraded
- Rebuild Route
- Existing AEP Transmission Line

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



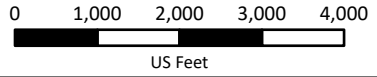
May 2026



Project Location Map



**Abert - Reusens Transmission
Improvements Project**



Abert-Reusens

Abert-Reusens Transmission Improvements

Project

Appalachian Power

Amherst County, Virginia



KOP 302

351 Burgess Rd

Proposed Route

Date: 01/13/2026

Time: 11:21 am

Viewing Direction: North

Distance to closest feature: 195 feet



Note: Project components illustrated are based on proposed preliminary designs. The images contained on this page show the proposed project within a wider landscape view than the actual view point. The distance and distance to closest feature are approximate.



EXISTING CONDITIONS



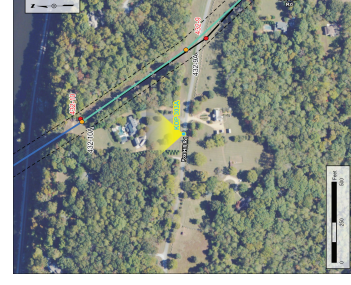
PROPOSED CONDITIONS

Abert-Reusens
 Abert-Reusens Transmission Improvements
 Project
 Appalachian Power
 Bedford County, Virginia



KOP 303A
 1662 Fox Hill Rd

Proposed Route
 Date: 01/13/2026
 Time: 2:52 pm
 Viewing Direction: East
 Distance to closest feature: 469 feet



Note: Project components illustrated are based on proposed preliminary designs. The images contained on this page show the proposed project within a wider landscape context to provide a sense of scale and distance when viewed from the actual view point.



EXISTING CONDITIONS



PROPOSED CONDITIONS

Abert-Reusens
 Abert-Reusens Transmission Improvements
 Project
 Appalachian Power
 Bedford County, Virginia



KOP 303B
 Fox Hill Rd and
 Fox Meadows Rd

Proposed Route
 Date: 01/13/2026
 Time: 3:04 pm
 Viewing Direction: West
 Distance to closest feature: 207 feet



Note: Project components illustrated are based on proposed preliminary designs. The images contained on this page show the proposed project within a wider landscape context than the actual project. Scale, timing, and distance when viewed from the actual view point.



EXISTING CONDITIONS



PROPOSED CONDITIONS

Attachment F: Aerial Mapbook (Proposed Route)



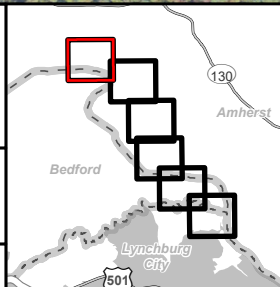
- △ Existing AEP Substation to be Upgraded
- Proposed AEP Structure
- Existing AEP Structure to be Removed
- Rebuild Route (On New Centerline)
- Rebuild Route (On Existing Centerline)
- ×× Existing AEP Transmission Line to be Removed
- ▭ Proposed Right of Way

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



May 2026

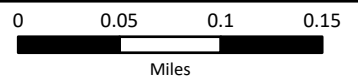


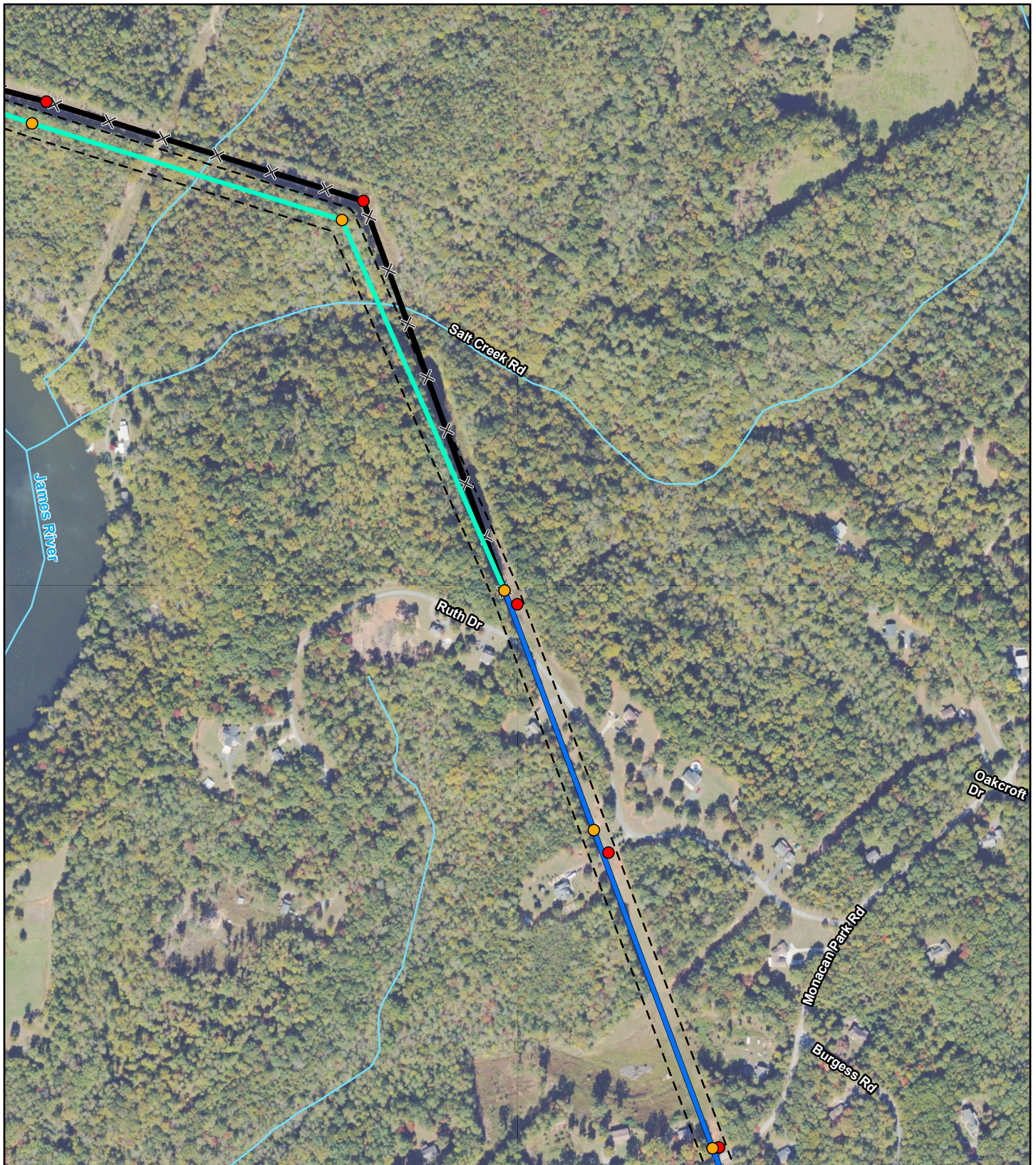
Attachment F Proposed Route Mapbook

Map 1 of 6



**Abert - Reusens Transmission
Improvements Project**





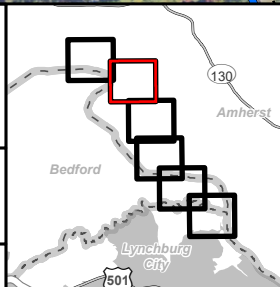
- Proposed AEP Structure
- Existing AEP Structure to be Removed
- Rebuild Route (On New Centerline)
- Rebuild Route (On Existing Centerline)
- ⊗ Existing AEP Transmission Line to be Removed
- ▬ Proposed Right of Way

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



May 2026

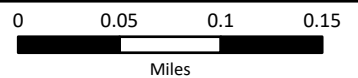


Attachment F Proposed Route Mapbook

Map 2 of 6



Abert - Reusens Transmission
Improvements Project





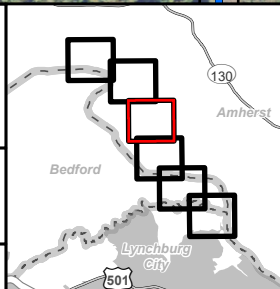
- Proposed AEP Structure
- Existing AEP Structure to be Removed
- Rebuild Route (On Existing Centerline)
- Proposed Right of Way

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



May 2026

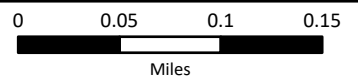


Attachment F Proposed Route Mapbook

Map 3 of 6



Abert - Reusens Transmission
Improvements Project





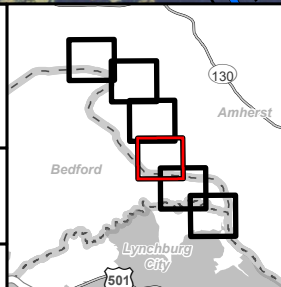
- Proposed AEP Structure
- Existing AEP Structure to be Removed
- Rebuild Route (On Existing Centerline)
- Proposed Right of Way

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



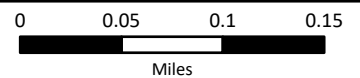
May 2026

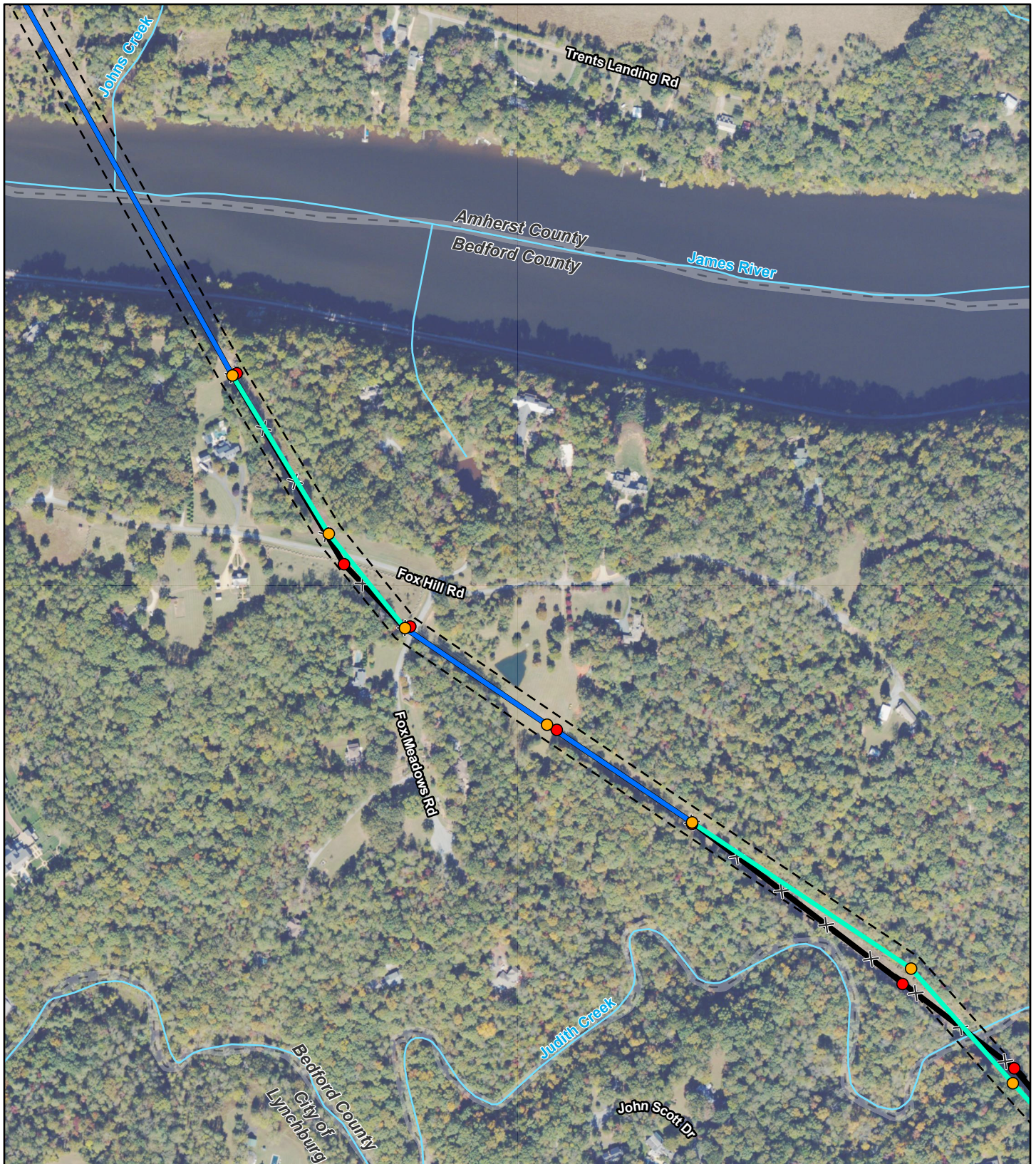


Attachment F
Proposed Route Mapbook
Map 4 of 6



**Abert - Reusens Transmission
Improvements Project**





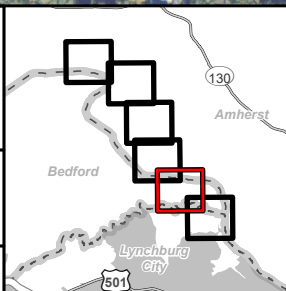
- Proposed AEP Structure
- Existing AEP Structure to be Removed
- Rebuild Route (On New Centerline)
- Rebuild Route (On Existing Centerline)
- ⊗ Existing AEP Transmission Line to be Removed
- ⊔ Proposed Right of Way

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



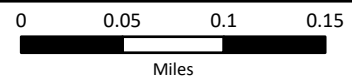
May 2026

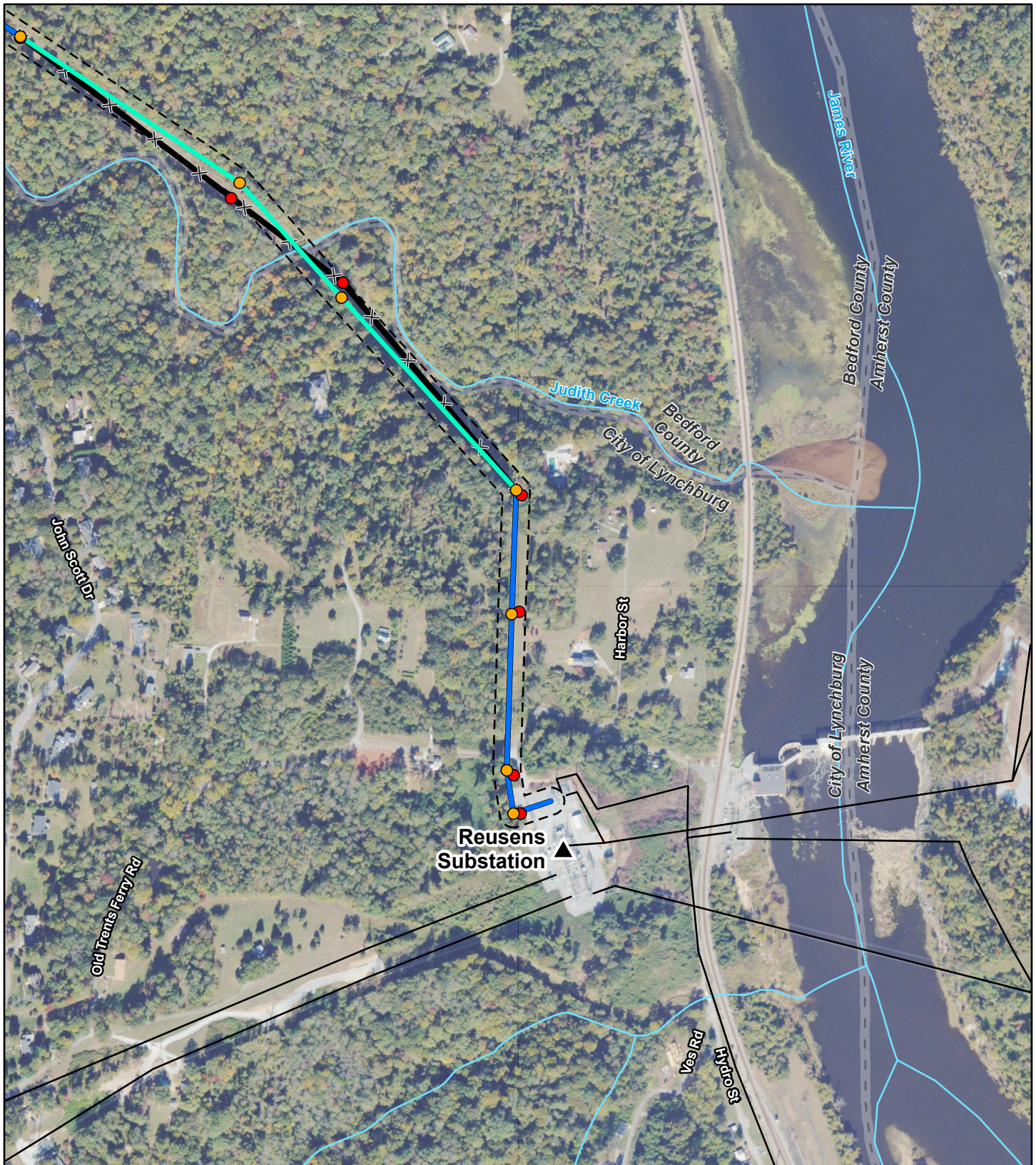


Attachment F
Proposed Route Mapbook
Map 5 of 6



**Abert - Reusens Transmission
Improvements Project**





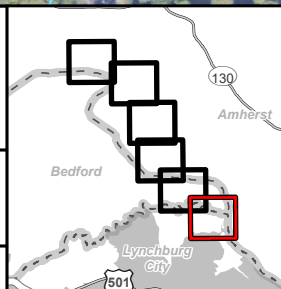
- ▲ Existing AEP Substation
- Proposed AEP Structure
- Existing AEP Structure to be Removed
- ▬ Rebuild Route (On New Centerline)
- ▬ Rebuild Route (On Existing Centerline)
- ✕✕ Existing AEP Transmission Line to be Removed
- ▬ Proposed Right of Way

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



May 2026



Attachment F Proposed Route Mapbook

Map 6 of 6



Abert - Reusens Transmission
Improvements Project

