

**Attachment 2.I.1
VDHR Pre-Application Analysis**



Abert – Reusens Transmission Improvements Project

Pre-Application Analysis Report

PREPARED FOR



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Abert – Reusens Transmission Improvements Project

Pre-Application Report
0766900



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ACRONYMS AND ABBREVIATIONS

3D	Three dimensional
AF	Auto Focus
CMOS	Complementary Metal Oxide Semiconductor
ERM	Environmental Resources Management
ESRI	Environmental Systems Research Institute
GNSS	Global Navigation Satellite System
JPEG	Joint Photographic Experts Group format
KOP	Key Observation Point
kV	kilovolt
NHL	National Historic Landmarks
NPS	National Park Service
NRHP	National Register of Historic Places
PBR	Physically Based Rendering
PDF	Portable Document Format
Project	Abert – Reusens Transmission Improvements Project
SCC	State Corporation Commission
SLR	Single-Lens Reflex
USGS	U.S. Geological Survey
UTM	Universal Transverse Mercator
VCRIS	Virginia Cultural Resource Information System
VDHR	Virginia Department of Historic Resources
VLR	Virginia Landmarks Register

EXECUTIVE SUMMARY

This report presents the findings of a pre-application analysis completed by Environmental Resources Management on behalf of Appalachian Power Company. Appalachian Power Company is proposing to rebuild approximately 4.4 miles of its existing Big Island – Reusens 69-kilovolt 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 involves rebuilding the existing single-circuit transmission line with a higher-capacity 69-kV conductor to improve system performance and ensure compliance. The Project also includes upgrading the existing Abert Substation on Company-owned property in Amherst County. The Project is necessary to comply with electric reliability standards and to maintain reliable service in portions of Amherst and Bedford Counties and the City of Lynchburg. The Project is also necessary to replace aging infrastructure in which open structural conditions are present along the line.

This pre-application analysis assesses and compares potential impacts on previously recorded historic and archaeological resources in relation to the proposed route under consideration for the Project. Environmental Resources Management conducted the analysis on behalf of the Company to assist in the development of a feasible Project design that minimizes impacts to historic resources. The pre-application analysis is a required study for transmission line projects regulated by the State Corporation Commission. The study was completed in accordance with the Virginia Department of Historic Resources’ “Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia” (VDHR 2008).

No previously recorded archaeological sites were identified within or adjacent to the right-of-way for the route under consideration. Eight previously recorded aboveground historic resources meeting criteria specified in the Guidelines are within study tiers defined by the Virginia Department of Historic Resources for identifying aboveground historic resources along and near the proposed Project (see Table 1). Of these, four are listed on the National Register of Historic Places, two are eligible for listing on the National Register of Historic Places, and two are considered locally significant for the purposes of this report. Environmental Resources Management recommends that installation of transmission infrastructure related to the Project would result in a minimal impact to three resources and no impact for the remaining five resources.

TABLE 1 EXECUTIVE SUMMARY OF PROJECT IMPACTS TO CONSIDERED ABOVEGROUND HISTORIC RESOURCES IN THE STUDY AREA OF THE PROPOSED ROUTE

Considered Resource	Abert – Reusens Transmission Improvements Project	
	Proposed Route	
005-5536	Minimal	
009-0043	None	
009-5283	Minimal	
118-0218	None	
118-0224	None	
118-5240	None	
118-5546	None	
118-5717	Minimal	

1. INTRODUCTION

This report presents the findings of a pre-application analysis completed by Environmental Resources Management (“ERM”) on behalf of Appalachian Power Company (“Appalachian Power” or “Company”). The Company is proposing to rebuild approximately 4.4 miles of its existing Big Island – Reusens 69-kilovolt (“kV”) Transmission Line between the existing Abert Substation in Amherst County and Reusens Substation in City of Lynchburg, Virginia. The Abert – Reusens Transmission Improvements Project (“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 expanded on Company-owned property. The Project is necessary to comply with electric reliability standards and to maintain reliable service in portions of Amherst and Bedford Counties and the City of Lynchburg. The Project is also necessary to replace aging infrastructure in which open structural conditions are present along the line.

This pre-application analysis assesses and compares potential impacts on previously recorded historic and archaeological resources in relation to the proposed route under consideration for the Project. ERM conducted the analysis on behalf of the Company to assist in the development of a feasible Project design that minimizes impacts to historic resources. The pre-application analysis is a required study for transmission line projects regulated by the Virginia State Corporation Commission (“SCC”). The study was completed in accordance with the Virginia Department of Historic Resources’ (“VDHR”) “Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia” (VDHR 2008) (“Guidelines”).

1.1 PROPOSED ROUTE OVERVIEW

The Proposed Route is approximately 4.4 miles long and will be rebuilt as a single-circuit 69 kV line in or near the existing 100-foot-wide right-of-way (“ROW”) in Amherst and Bedford Counties and the City of Lynchburg. The Proposed Route includes three minor diversions from the existing centerline to minimize constructability impacts and avoid constraints. Approximately 3.9 miles of the 4.4-mile-long Proposed Route will be rebuilt in the existing ROW, which has been in-service since the 1960s.

The Proposed Route begins at the Company’s existing Abert Substation (245 Nikonha Lane) in Amherst County, north of the James River. The Proposed Route exits the substation and continues east within or parallel to the existing ROW for about 1.0 miles, crossing Salt Creek Road. The Proposed Route continues south for about 2.1 miles within the existing ROW through southeastern Amherst County, crossing Ruth Drive, Monacan Park Road, and Burgess Road. The Proposed Route then crosses the James River within the existing ROW. The route traverses northeastern Bedford County for about 0.8 miles, which includes a slight diversion of the existing centerline at Fox Hill Road (less than 50 feet to the east). The Proposed Route crosses Judith Creek within or near the existing ROW and then traverses the northeastern extents of the City of Lynchburg for about 0.5 miles within the existing ROW to the Company’s existing Reusens Substation (200 Old Trents Ferry Road), west of the James River.



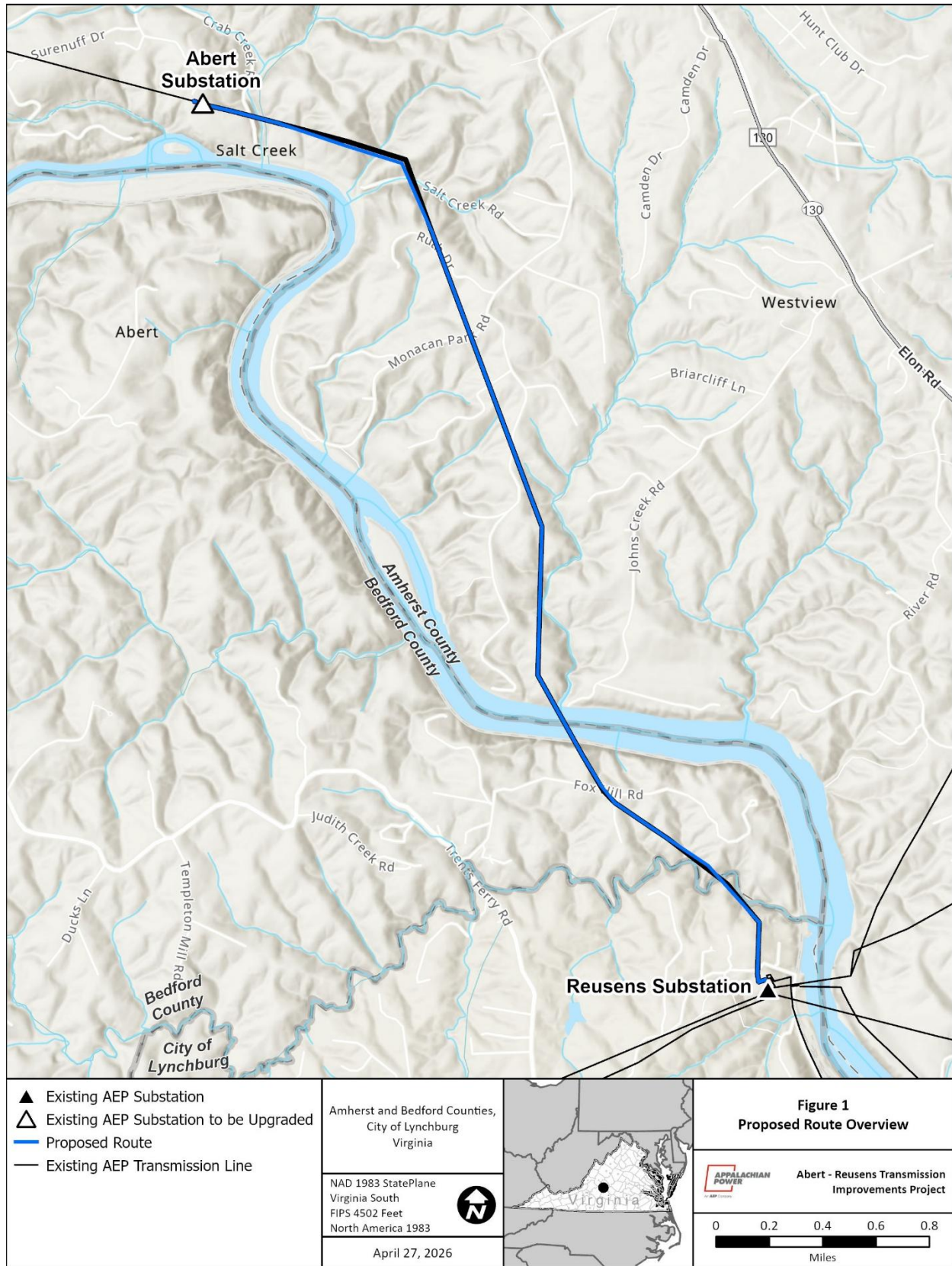
Figure 1 shows an overview of the Proposed Route.

1.2 RECOMMENDATIONS

No previously recorded archaeological sites were identified within or directly adjacent to the Proposed Route.

Eight previously recorded resources meeting criteria specified in the Guidelines fall within study tiers defined by the VDHR for identifying aboveground historic resources along and near the Proposed Route. ERM recommends that the Proposed Route would have a minimal impact on three resources and no impact on the remaining five resources.

FIGURE 1 PROPOSED ROUTE OVERVIEW



2. RECORDS REVIEW

2.1 DATA COLLECTION APPROACH

ERM conducted an analysis of potential cultural resource impacts for the route under consideration in accordance with the Guidelines. This analysis identified and considered the following previously recorded resources:

- National Historic Landmarks (“NHLs”) within a 1.5-mile radius of each alternative route;
- National Register of Historic Places (“NRHP”)-listed properties, NHLs, battlefields, and historic landscapes within a 1.0-mile radius of each alternative route;
- NRHP-eligible and NRHP-listed properties, NHLs, battlefields, and historic landscapes within a 0.5-mile radius of each alternative route; and
- All of the above qualifying resources as well as archaeological sites within the ROW for each alternative route.

Data on previously recorded cultural resources within each study tier was collected from the Virginia Cultural Resource Information System (“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 Proposed Route’s centerline.

Along with the records review, ERM conducted field assessments of the considered aboveground resources along each route in accordance with the Guidelines. Where publicly accessible, digital photographs of each historic resource and views to the proposed transmission line to be rebuilt were taken. Photo simulations were then prepared to assess the potential for visual impacts from the new transmission infrastructure on the resources.

2.2 ARCHAEOLOGICAL SITES

Crossings of archaeological sites were considered a constraint in this study due to the potential for an electric transmission line to impact cultural deposits in these areas (for example, due to transmission structure placement, tree clearing, or heavy equipment traffic within a site). However, no previously recorded archaeological sites were identified within or directly adjacent to the Project.

2.3 HISTORIC RESOURCES

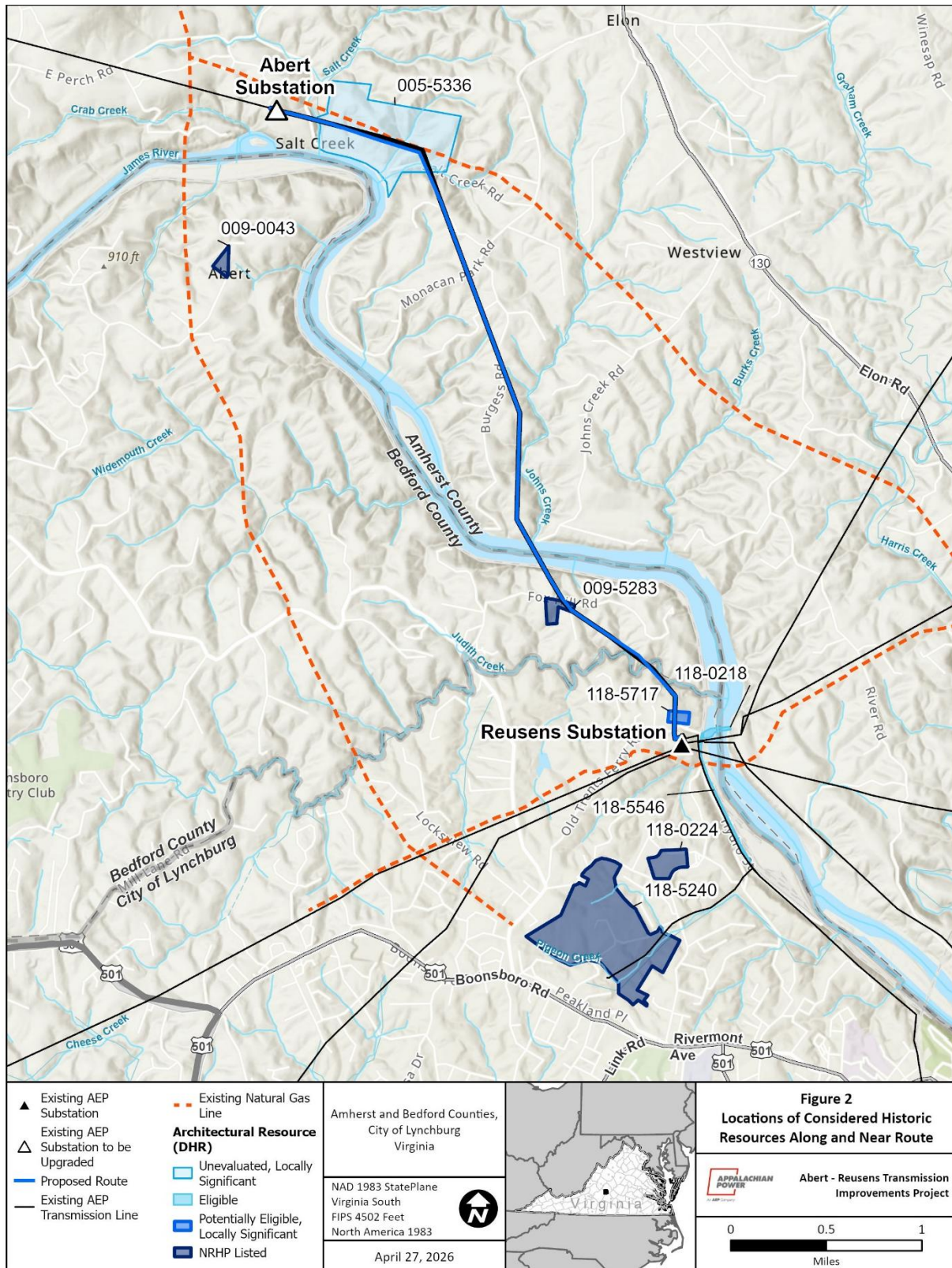
The following discussion summarizes the known historic resources in the vicinity of each alternative route based on the VDHR’s tiered study model defined in the Guidelines. The locations of the considered resources and the various alternative routes are shown in Figure 2. The Proposed Route map is provided in Attachment 1.

Resources located within what would be the ROW of the Proposed Route may be subject to both direct impacts from placement of the line across the property as well as visual impacts from changes to the viewshed introduced by the new transmission line structures and conductors.

Resources in the 0.5-mile tier would not be directly impacted, but would likely be visually impacted, unless topography, vegetation, or the built environment obscures the view to the transmission line. At a distance of over 0.5 mile, it becomes less likely that a resource would be within line-of-sight of the proposed transmission line. Beyond 1.0 mile, it becomes even less likely that a given resource would be within line-of-sight of a transmission line.

If the Project is certified by the SCC, the route would be subject to a full historic architectural survey in which additional (as of yet, unrecorded) historic properties could be identified and Project impacts assessed. The survey area would be defined based on the design height of the transmission line structures, topography, tree cover, and other factors impacting line-of-sight from historic resources to the selected route.

FIGURE 1 LOCATIONS OF CONSIDERED HISTORIC RESOURCES ALONG AND NEAR THE PROPOSED ROUTE



2.3.1 PROPOSED ROUTE

The considered resources that lie within the VDHR tiers for the Proposed Route are presented in Table 2 and depicted in the map provided as Attachment 1. ERM identified eight aboveground historic resources within the VDHR tiers for the Proposed Route. The considered resources were subjected to field reconnaissance and a preliminary assessment of impact, discussed in the next chapter.

TABLE 2 HISTORIC RESOURCES IN THE VDHR TIERS FOR THE PROPOSED ROUTE

Buffer (miles)	Resource Category	Resource Number	Description
0.5 to 1.0	National Register Properties (Listed)	009-0043	Hope Dawn
		118-0224	Virginia Episcopal School
		118-5240	Presbyterian Orphans Home
0.0 to 0.5	National Register – Eligible	118-0218	Reusens Dam
		118-5546	CSX Railroad
0.0 (within ROW)	National Register Properties (Listed)	009-5283	Bowling Eldridge House
	Locally Significant	005-5336	Bethel/Salt Creek
		118-5717	Buckley House

Source: VDHR 2024

2.4 PREVIOUS SURVEYS

Portions of the Project have previously been surveyed for cultural resources, among six studies reported within 1.0 mile of the Project. Two of the surveys intersect a portion of the route under consideration. Most of the route has been subject to previous survey coverage. Information on these previous surveys (including VDHR survey number, report title, report authors, and report date) is provided in Table 3. The extent of the previous survey coverage is depicted on maps provided in Attachment 2.

TABLE 3 CULTURAL RESOURCE SURVEYS WITHIN 1 MILE OF THE PROPOSED ROUTE

VDHR Survey Number	Title	Authors	Date
AH-058	Archaeological Survey of the Proposed Colonial Pipeline Company Expansion Project, the James River Crossings, Amherst and Appomattox Counties, Virginia	Patrick H. Garrow, Thomas R. Wheaton, Stephen H. Savage	1979
CP-113	Phase I Archaeological Investigation Peakland Switch-Reusens 69kV Transmission Line Rebuild Project, City of Lynchburg, Virginia	Angela N. Hood	2020



CP-123	Technical Report: Phase I Archaeological Investigation Peakland Switch-Rivermont 69kV Rebuild Project, City of Lynchburg, Virginia	Lee J. Arco, Brent E. Shreckengos	2021
BE-083	Phase I Archaeological Survey Reusens-New London Transmission Line Rebuild Project, Bedford County and City of Lynchburg, Virginia	Angela N. Hood, Brent E. Shreckengost	2022
AH-067	Cultural Resources Phase I Survey Report – Addendum I: Amherst - Reusens 69-kV Transmission Line Rebuild, City of Lynchburg and Amherst County, Virginia	Jahleen E. Sefton, Tanner Haynes	2023
AH-066	Cultural Resources Phase I Survey Report, Amherst - Reusens 69-kV Transmission Line Rebuild, City of Lynchburg and Amherst County, Virginia	Tanner Haynes, Jahleen E. Sefton, Travis Corwin	2023

Source: VDHR 2025

*Gray highlighted rows denote surveys that overlap portions of the Proposed Route

3. STAGE I PRE-APPLICATION ANALYSIS FINDINGS

3.1 METHODS OF ANALYSIS

Fieldwork for the pre-application analysis was conducted by Emma Jennings and Kaitlin Becht under the direction of Secretary of the Interior Qualified architectural historian, Mary Beth Derrick on January 13 and 14, 2026. The fieldwork involved photographing eight resources requiring visual assessment according to the Guidelines and examining potential line-of-sight views from each resource toward the route. For resources where property owner approval was granted for historic resource documentation, photographs were taken toward the route from the property at the most prominent view of the landscape. When permission to access such locations was not available, photographs were taken from the public ROW (typically a road) nearest the resource facing toward the applicable route.

Panoramic photographs were taken from each resource, with an effort to capture the direction with the clearest, most unobstructed view toward the route. The precise location of the photograph was captured with a mobile tablet device connected to a sub-meter accurate Global Navigation Satellite System (“GNSS”) receiver, the Trimble R1. The locations from which photographs were taken were noted as Key Observation Points (“KOPs”). Site visits to the KOPs were prioritized based on their location relative to the resource, so that viewpoints east of the resource were visited in the morning and viewpoints west of the resource were visited in the afternoon. This helped ensure, where possible, that the sun was behind the photographer at the time the viewpoint photography was captured. Additionally, minor adjustments to position were made to obtain as clear a view to the site center as possible, avoiding trees, landscaping, or built obstructions. Tablets recorded the center bearing, angle of view, altitude, and camera lens height. Upon receipt of the viewpoint location information, the viewpoints were plotted onto open-source mapping from the Environmental Systems Research Institute (“ESRI”) using the Universal Transverse Mercator (“UTM”) 18N coordinate system.

The process of taking panoramas included setting up the tripod and camera. The camera was placed on the panoramic head in a landscape orientation where its lens height was confirmed and set at 1.5 meters (note: a portrait camera orientation was sometimes used in situations where the viewpoint is very close to a development so that the top of the development is not cut off by the image boundaries). The tripod head and camera combination were then leveled. With the camera’s viewfinder centered on the perceived site center, exposure and focus settings were taken. These were then fixed manually on the camera so that they could not be inadvertently altered. The head was rotated 90 degrees to the left where the first frame of the 360-degree sequence was then taken. Each subsequent frame was taken using a 50 percent overlap of the previous frame until the full 360-degree sequence was captured. The camera was then removed from the tripod and a viewpoint location photograph was captured showing the tripod in its position. The following camera and tripod configuration were used:

- Camera body: Nikon z6ii professional specification digital Single Lens Reflex (“SLR”) (full frame complementary metal oxide semiconductor [‘CMOS’] sensor)
- Camera lens: Nikkor Auto Focus (“AF”) 50mm f1.8 prime

- Tripod: Ulanzi Zero F38 Quick Release Travel Tripod 3131 with Level
- Panoramic head: Nodal Ninja 6 with Nadir Adapter

After the photos were complete, they were uploaded to a server to begin the simulation/ visualization process. The single-frame photographs were opened in Adobe Photoshop CC 2022 where they were checked, and any camera sensor dust spots were removed before being saved as high-resolution joint photographic experts group format (“JPEG”) images. If required, discrete color and tonal adjustments were made to each frame before they were saved. The single-frame photographs were stitched together in PTGui Pro version 12.11 professional photographic stitching software using cylindrical projection settings. The camera locations were plotted in Global Mapper version 23.1. Digital models of the transmission line structures were provided by the Company, then cleaned up and textured in Autodesk 3DS Max 2021. The transmission structures along the route were rendered in Vray version 5.2 from each KOP camera location. Three-dimensional (“3D”) imagery was produced at the field of view using camera matching. Renderings for the route and each tower combination were then exported for use as an overlay.

Detailed, correctly dimensioned 3D computer models of the transmission structures along the route were generated using Autodesk 3DS Max 2021 and iToo RailClone. The virtual 3D model of the structures was created using real-world measurements and elevation drawings provided by the Company (see Attachment 3). These were textured using Vray physically based rendering (“PBR”) materials to simulate the weathering steel texture. The detailed, textured models were rendered to a digital image using a simulated physical camera and a sun and sky simulation lighting model in the computer software consistent with conditions within the original viewpoint photography.

Photomontages were produced by overlaying the rendered image on the photograph, using known control points and the wireline imagery showing the tower columns at the correct height and distance. Final adjustments were then made to the brightness and contrast of the rendered images to match them to the photograph. Final photomontages were prepared from each viewpoint for each route. These were then opened in Adobe Photoshop CC 2022 where minor changes were made such as placing relevant tree/building/hedge screening or telegraph wires over the proposed development renders where necessary. Finally, the final images were cropped to the proportions required for the visual simulation figures, and the visualization figures were prepared in Adobe InDesign CC2022 and exported in a portable document format (“PDF”).

Additional viewshed renderings were conducted to assess the visibility from some of the resources to the alternative routes. In order to complete this, Digital Surface Model viewshed analyses were prepared using a Digital Elevation Model derived from National Elevation Dataset 1/3 arc second Elevation Dataset. Focal points were placed along the centerline at locations preliminarily assigned by engineering. Structure heights ranged from 60 feet to 86 feet above the ground, as noted in the structures’ attributes. Vegetation data was derived by combining the Virginia Landcover data with the tree heights (in meters) from the USDA LANDFIRE dataset. The resulting visual analyses are presented in Attachment 6.

3.2 STRUCTURE TYPES AND ROW WIDTHS

The existing Big Island – Reusens 69-kV Transmission Line has been in-service since the 1960s. The single-circuit transmission line consists primarily of wooden H-frames and three-pole structures. The Company anticipates primarily using single-circuit steel H-frame and three-pole structures for the rebuilt line; however, the final structure types will be determined during final engineering. The anticipated heights of the proposed structures range between 65 and 86 feet. The average height of the proposed structures will be approximately 20 feet taller than the average height of the existing structures. The transmission line will be rebuilt in or near the existing 100-foot-wide ROW.

3.3 ASSESSMENT OF POTENTIAL IMPACTS

The assessment of potential Project impacts on individual resources made use of the visual assessment findings and categorized the level of impacts according to the following scale devised by VDHR:

- **None**–Project is not visible from the resource.
- **Minimal**–Viewsheds have existing transmission lines, there would be only a minor change in height, and/or other views are partially obscured by topography or vegetation.
- **Moderate**–Viewsheds have more expansive views of the transmission line, more dramatic changes in height are proposed, and/or the overall visibility of the Project would be greater.
- **Severe**–Existing viewshed contains no transmission line, the view to the Project would be relatively unobstructed, the new transmission line would introduce a significant change to the setting of historic properties, and/or a dramatic change in the height of an existing transmission line would take place in close proximity to historic properties.

3.4 HISTORIC RESOURCE DESCRIPTIONS

3.4.1 005-5336, BETHEL/SALT CREEK

The resource represents the remnants of the community of Bethel, also known as Salt Creek, located on the James River in southwestern Amherst County. The components include a circa 1830 tavern and wash house, the ruins of a circa 1830 post office, two early twentieth century dwellings, and two modern dwellings (circa 2000). The former community is located along the former Salt Creek Road, which used to extend to the north side of the James River and connected with Crab Creek Road. The resource encompasses 200 acres at a bend in James River about 7.5 miles northwest of Lynchburg. The town was laid out before 1775 by Nicholas Davies, who advertised lots for sale or rent in the Virginia Gazette in that year. The fledgling town hoped to attract tradesmen and industrialists, who could set up shops and factories to produce textiles, rope, and beer. No structures from the eighteenth century have been identified at the site, which is largely overgrown. The two nineteenth-century buildings date to the period just before the James River and Kanawha Canal was completed along the James River. The canal was completed to Lynchburg in 1840, and to Buchanan in 1851 (Pulice 2022).

The town does not appear on eighteenth century maps of Virginia, but by 1822 it is shown on a road that ran along the base of the Blue Ridge, linking the county seats of Nelson, Amherst, and

Bedford counties (Carey and Lea 1822). A map of Amherst and Nelson counties made by the Confederate Engineer's Office during the Civil War (Gilmer 1864) shows a cluster of buildings at Bethel. A ferry and a segment of the James River and Kanawha Canal were located on the opposite bank. Two buildings are shown within the boundaries of the resource on an 1866 map of Amherst County, but the community is not named (Hotchkiss and Robinson 1866). An 1879 map shows the names Bethel and Salt Creek. The Richmond and Allegheny Railroad was being constructed along the tow path of the abandoned James River on the opposite bank of the river (Gray 1879). By 1884, the town was referred to as Salt Creek on maps of the state (Rand McNally and Company 1884)

Salt Creek is shown on maps of the state throughout the late nineteenth and twentieth centuries. A 1939 topographic shows seven structures along the north bank of the river around the mouth of Salt Creek. The same structures are shown on topographic maps from 1950 and 1963. Additional structures were constructed by 1985. All of the structures shown on topographic maps were dwellings or outbuildings. No schools, churches, or stores are shown. Historic aerial photographs indicate that the land between Salt Creek Road and the river was used for farming until the mid-1960s but eventually became overgrown. Salt Creek Road appears to have become an unimproved road by 1994 (NETRonline 2026; USGS 1939, 1950, 1963; 1985). ERM attempted to visit the resource in 2026 but was unable to access due to private roads (Attachment 4, Figure 1). However, according to aerial views, only a few structures remain on the southeastern border of the resource.

The community of Bethel/Salt Creek was first documented in 2010 by Landmark Preservation Associates and The Antiquaries, LC. The site was visited again in 2022 by Michael J. Pulice of the VDHR who documented the existing resources at the site. The resource was not evaluated for NRHP eligibility but was recommended for further study. ERM has recommended it locally significant for the purposes of this report. Resource 005-5336 is located within the ROW for the Proposed Route.

3.4.2 009-0043, HOPE DAWN

Hope Dawn, 009-0043, is located at 2278 Abert Road in Lynchburg on a 235-acre lot. The surrounding area is heavily wooded with single family homes situated on large lots. The James River is located to the north and east of the resource.

In October of 2005, Hope Dawn was surveyed by Micheal Pulice, who detailed the history of the resource. At that time, the early-nineteenth-century farmhouse was described as an excellently preserved example of Piedmont Virginia rural architecture. Hope Dawn was originally the country home of Dr. Howell Davies, a noted druggist in Lynchburg. Davies' grandfather settled on lands he patented between 1771 and 1783 and it was on part of this land that the current house was built. The exact construction date is unknown, but Davies was listed as owning 1200 acres on the James River from 1827 to 1841. The resource changed hands several times over the years. In the 1960s, the property underwent extensive restoration. Bethel Road, an early stage road, was mentioned in early deeds and was used as a private drive at the time of this survey. This road was said to have been used by Thomas Jefferson as a shortcut from Monticello to Poplar Forest (Pulice 2005). In

2005, it was also recorded that at the time, the owner occupied a secondary dwelling on the property.

The nomination form from 1974 described Hope Dawn’s architecture in detail as a one-and-a-half story, Federal style brick farmhouse with a three-bay main block and a one-bay wing on the south elevation. The walls were laid in Flemish bond with a cornice of corbelled courses of headers. It had an uncoursed, quarried stone foundation. The main block had interior end chimneys. Originally the gable roof was covered with rounded wooden shingles but in 1974, it was clad in standing-seam metal (VHLC, 1974). The main block's first floor had nine-over-nine and six-over-six sash windows. The facade had six-over-six pedimented dormer windows with dentil moldings. The main entrance had a round arch transom and a glazed door which replaced the original paneled door. This entrance was covered by a pedimented portico with a stone foundation. The wing had a shed porch, and its porch steps were restored to their original location in the center. The wooden steps on the rear of the main block are modern. In 1974, the main block had a center hall, although it probably would have had a hall-parlor plan originally. Before restoration, the first floor ceilings were covered with circa 1900 tongue-and-groove paneling which was later removed and left exposed. The 1974 nomination also noted the resource's outstanding Federal mantels. The basement of the wing originally served as the kitchen and during restoration the floor was paved with brick. A section of the basement was only three feet high and was used for storage. Hope Dawn's grounds included multiple outbuildings. South of the house is a stone and brick stable that was remodeled as guesthouse. A simple stone structure of various uses was located southwest of the house. The frame office to the northwest of the house was previously in the yard of a tavern in Amherst Court House, and was moved to its current location in the 1950's. The house's front yard was enclosed by a stone wall which ran along the trace of the old Bethel turnpike (VHLC, 1974). ERM visited the resource in January 2025 but could not survey the resource due to the resource’s location at the end of a long private drive (Attachment 4, Figure 2). However, according to aerial imagery, there appears to be no major changes since the previous survey.

Hope Dawn was listed on the NRHP and Virginia Landmarks Register (“VLR”) in 1974 and is located within the 1.0-mile study area for the Proposed Route. Its associated easement is located within the 0.5-mile study area for the Proposed Route.

3.4.3 009-5283, BOWLING ELDRIDGE HOUSE

The Bowling Eldridge House, 009-5283, is located at 1651 Fox Hill Road/Route 794 in Lynchburg on an approximately 7.0-acre lot. The surrounding area is heavily wooded with single-family homes situated on large lots. The James River runs north and east of the resource.

The Bowling Eldridge House was first surveyed in 1974 by Zelma Lee Overby from the VDHR. The nomination mentioned that according to tax records, the house was built in 1822 or 1823 by Bowling Eldridge, a tobacco planter and mill owner, and his wife Mildred Baker Gaines Eldridge. In the mid-nineteenth century the plantation included nearly a thousand acres and was sustained by more than seventy enslaved people. After the Civil War, the house was neglected for a long period of time. In the 1960s the house was passed back into Eldridge ownership and was being prepared for restoration (Pezzoni, 1993). In 2000 the VDHR requested permission to relocate the Bowling

Eldridge House from its location on Route 662 in Halifax County to Route 794 in Bedford County. In this request, more information was provided on the house's original location overlooking the Birch Creek Valley also called "Ridgecrest" and the new site that encompassed seven acres (DHR 2000). This move was completed, which is why the resource is currently in Bedford County.

In 1993 the resource was surveyed again by the VDHR. The 1993 survey noted two twentieth century outbuildings near the house and multiple outbuildings. At the southern edge of the parcel was a frame shed and a chicken house dating to the mid-twentieth century. This survey also described the Eldridge Cemetery, enclosed by a granite wall with graves marked by uninscribed fieldstone markers. On the other side of Route 662 was a one-story former tenant house clad in aluminum siding. A tobacco barn foundation, a log outbuilding, and an unoccupied log tenant house were also mentioned. The 1993 NRHP nomination described the Bowling Eldridge House as a well-preserved early nineteenth century example of a plantation (Pezzoni 1993). The Bowling Eldridge House was described as being a two-story, five-bay frame house with a metal, gable roof and it was clad in beaded weatherboard siding. It had brick exterior-end chimneys, a brick foundation, and an original or early two-story ell with a brick exterior-end chimney. On the facade was a centrally located one-story porch, with elements of the original two-story pedimented portico. The interior had plaster and lath walls, wood floor, and the original paneled doors. The center-passage stair and other interior features were designed in the Federal style. ERM visited the resource in January 2026 and noted some changes from the previous survey. Not only has the resource moved to Bedford County, but the roof is now clad in asphalt shingles and most of the materials have been replaced. The house and outbuildings were in excellent condition and appeared to be well-maintained (Attachment 4, Figure 3).

The Bowling Eldridge House was listed on the VLR in June of 1993 and was later listed on the NRHP in August 1993. It is located within the ROW for the Proposed Route.

3.4.4 118-0218, REUSENS DAM

Reusens Dam is located approximately 60 feet east of the Project, directly east of the intersection between Hydro Street and Old Trents Ferry Road. The dam spans the entire width of the James River and is part of the Reusens Hydroelectric Power Plant.

118-0218 was originally surveyed in December of 2005, twice more in September of 2019 and 2022, and most recently in October of 2024 by Adrienne Birge-Wilson. Birge-Wilson described the structure as a circa 1903 dam spanning the James River on the north edge of the Lynchburg city limits that connects to a power plant building located on the south side of the river. Birge-Wilson described the main dam, the Reusens Dam, as a gravity structure that is approximately 416 feet long by 24 feet high, constructed of granite block and concrete (Birge-Wilson 2024). The dam featured regularly positioned concrete piers to support the steel framework that makes up the electrically operated gates. Each of these gates were 44 feet long by 16 feet, 9 inches high. Birge-Wilson described the dam's associated power plant building as a two-story structure featuring brick walls accented by vertical bays delineated by relief panels and multi-light arched windows, all topped by a flat roof (Birge-Wilson 2024). It was stated that the dam represents local early twentieth century development and construction methods. ERM visited the dam in 2025 and noted no changes since the previous survey (Attachment 4, Figure 4).

Reusens Dam was first considered eligible for listing on the NRHP under Criterion A in 1977 by VDHR, and was subsequently determined eligible in January of 1991. Previous surveys have concurred with this determination, and the VDHR has most recently reaffirmed that 118-0218 is eligible for listing on the NRHP in 2024 under Criteria A and C. 118-0218 is located within the 0.5-mile study tier for the Proposed Route.

3.4.5 118-0224, VIRGINIA EPISCOPAL SCHOOL

Virginia Episcopal School is located at 400 Virginia Episcopal School Road in Lynchburg. The resource is located north of Williams Road with associated outdoor sports facilities located to the northeast and southeast of the school off V.E.S. Road. The property where the school is currently located was originally a farm and the school was opened in 1916 and continues to grow. The surrounding area is suburban, with a mix-use of residential and commercial buildings with pockets of wooded lands.

Virginia Episcopal School has only been surveyed once in 1992 by Calder Loth of VDHR. Loth described the school as a complex of four red-brick Georgian Revival buildings designed by Washington architect Frederick H. Brooke built between 1915 and 1920 (Loth 1992). The primary building at the time of the survey was Jett Hall, a three-story U-shaped building housing classrooms and dormitories built in 1916. Jett Hall was clad in brick laid out in a Flemish bond. The building's front façade was nine bays wide with a centrally placed Corinthian portico. It was topped with a shallow hipped roof that at the time of survey was described as clad in original slate. The building's first floor windows were described as shallow blind arches with the lunettes of the two central windows ornamented with the inscriptions "VES" in raised brick (Loth 1992). The windows throughout the second and third floor feature cast-stone keystones.

The associated buildings that made up the Virginia Episcopal School included Pendleton Hall, Langhorne Memorial Church, Barksdale Gymnasium, three dwellings, a second gymnasium, and three non-contributing structures. Pendleton Hall, described in 1992 as a three-story building housing dormitories and classrooms, is located west of Jett Hall. Langhorne Memorial Church is described as located southwest of Pendleton Hall, was described as a compact temple-form church fronted by a Tuscan portico. Barksdale Gymnasium, originally designed by Brooke, was east of Jett Hall and noted by Loth as being partly engulfed by the William King Field House. The three dwellings consisted of a 1923 modified Dutch Colonial style dwelling named Banks House, a 1926 Georgian Revival faculty duplex house designed by Lynchburg architect Stanhope Johnson, located north of Barksdale Gymnasium, and a 1959 colonial-style faculty duplex on the west side of the front campus. The second gymnasium, named the William Field House, was built in 1949 in an unornamented modernist style. The three non-contributing buildings were described as being constructed between 1946 and 1991 and clad in red brick (Loth 1992). Since the 1992 survey, one of contributing buildings, the circa 1890 Minegea Cottage, was demolished in 2013. With the exception of this, when ERM surveyed the resource in 2026 there have been no changes since the previous survey (Attachment 4, Figure 5).

Virginia Episcopal School was added to the VLR in August of 1992 and the NRHP in October of 1992 under Criteria A and C after being recommended eligible by Loth in the same year. The

NRHP site includes seven associated contributing buildings (one has since been demolished) and three noncontributing buildings. It is located within the 1-mile study tier for the Proposed Route.

3.4.6 118-5240, PRESBYTERIAN ORPHANS HOME

The Presbyterian Orphans Home, now known as Presbyterian Homes & Family Services is located at 150 Linden Avenue in Lynchburg on an approximately 166-acre parcel. The VDHR described the property as a collection of eight buildings constructed in a U-shape with three associated buildings (Smith 2007). The original master plan was completed by the Lewis and Burnham Firm and revised in 1923 by landscape architect Charles F. Gillette. The surrounding area is a mix use of residential and commercial with pockets of vegetation and rolling hills. The Virginia Episcopal School (118-0224) is to the northeast of the resource while Pigeon Creek borders the resource to the south.

The Presbyterian Orphans Home was most extensively surveyed in 2007 by W. Scott Smith, Emmett W. Lifsey, and Amanda G. Adams. They described the primary building as a 1911, two-story Georgian Revival administrative building. The Executive Building was named after Edna & Bernard Bain and Edna & Bass Wood, all of whom were administrators and benefactors for the Presbyterian Orphans Home. In 2007, the building was described as being seven bays wide, constructed of load-bearing brick laid in a six-course American bond pattern, and topped with a hipped roof clad in slate shingles and copper ridge caps (Smith 2007). The survey mentioned an octagonal cupola clad by a copper dome atop of the hipped roof. The corners of the building were accented by brick quoins that alternate in height between four and three courses. The building's front façade featured a pair of glazed doors surrounded by pilasters supporting a dentiled pediment, and eight-over-eight double-hung windows, all capped by cement jack arches. The windows flanking the glazed doors were set into shallow alcoves that feature brick arched headers with cement keystones. Over the primary entrance was a tripartite window consisting of an eight-over-eight central unit flanked by a pair of four-over-four windows. The 2007 survey described the three central bays being recessed and covered by a two-story portico. The bays that flank this portico were trimmed with horizontal cement panels located between the first and second floor windows (Smith 2007). At the time of the survey, this administrative building was in good condition (Attachment 4, Figure 6).

In addition to the Bain and Wood building described above, the Presbyterian Orphans Home included the campus circle landscaping, a swimming pool, a stable, two barns, entry gates, six dormitories, a maintenance building, two dwellings, a gymnasium, and four additional dormitories that were not described, but all noted to be in good condition (Smith 2007). ERM surveyed the resource in 2026 and noted no major changes since the previous survey.

The Presbyterian Orphans Home was first listed on the VLR in December of 2007 after VDHR staff determined the resource eligible earlier that year. The Presbyterian Orphans Home was added to the NRHP in July of 2010 with eighteen contributing resources. It is located within the 1-mile study tier for the Proposed Route.

3.4.7 118-5546, CSX RAILROAD

The CSX Railroad that runs along the James River between Lynchburg and Buchanan was originally constructed as the James River and Kanawha Canal, conceived in 1785, but not completed to Lynchburg until 1840. The segment from Lynchburg to Buchanan was opened by 1851. The canal system consisted of locks, dams, and canals constructed along the James River to facilitate trade with the Virginia backcountry. Although the ultimate goal of connecting the James and Ohio rivers was never realized, the canal played an important role in the development of the James River valley (Hill and Trout 1971). However, the cost of the construction and maintenance of the system, which was frequently damaged by floods, along with the completion of the Chesapeake and Ohio Railway from Richmond to the Ohio River in 1873, made the canal obsolete. In 1880, the canal and its works were sold to the Richmond and Allegheny Railroad, which constructed a line along the canal's towpath (Schwartzkopf 2022). The railroad became a part of the Chesapeake and Ohio (C&O) system in the 1890s, providing access to coal deposits in West Virginia. Vast quantities of coal were transported along the line to the coal loading facilities at Newport News for shipment to the Eastern Seaboard and overseas. The railroad is still used to transport coal by CSX, which formed from the merger of the C&O, Baltimore and Ohio, and the Seaboard system in the 1980s (Chesapeake and Ohio Historical Society 2026).

The resource was first recorded in 2019 as a 0.7-mile segment of the CSX railroad system running south from the Reusens substation along the south side of the James River. The line was recorded as part of the Virginia Central Railroad, which began construction in 1836 from Richmond to Covington (Cress 2019). That line ran well to the north, through Charlottesville and Staunton. The Orange and Alexandria Railroad constructed a line from Charlottesville to Lynchburg by 1860. However, that line crosses the James River about 1 mile southeast of 118-5546 and did not follow the river (Gilmer 1864; National Railway Historical Society 2005).

Although misidentified and incorrectly dated, 118-5546 was determined eligible for listing in the NRHP in 2022, and the determination was confirmed in 2024 (VDHR 2026). The resource needs to be re-evaluated under its correct name and context, however, for the purposes of the present pre-application, the resource should be considered eligible for the NRHP. ERM visited the resource in 2026 and noted that the railroad is in good condition (Attachment 4, Figure 7). It is located within the 0.5-mile study tier for the Proposed Route.

3.4.8 118-5717, BUCKLEY HOUSE

Resource 118-5717 is located at 3921 Harbor Street in Lynchburg on the west side of the road. The surrounding area is densely forested, and the James River runs to the east. The western and southern edges of the parcel are lined with trees while the remaining areas consist of manicured lawns. The private drive was not accessible, and the resource was photographed from the public ROW.

Buckley House, 118-5717, was first surveyed in 2021 by Dana Cress of GAI Consultants, Inc. and the resource was recommended potentially eligible under Criterion C (Cress 2021). In 2002, GAI Consultants Inc. described the resource as a two-story Second Empire dwelling built in 1901. The dwelling was three bays wide and four bays deep. It had an asphalt shingle, mansard roof and was clad in vinyl siding. There were two gable dormers on the roof's façade and three dormers on

the north and south elevations. The façade's entrance had a broken pediment and sidelights and was located under a wrap-around porch with a flat roof supported by Tuscan columns. A secondary entrance with sidelights was accessible via a second story porch on the north elevation. Fenestration consisted of two-over-two, double-hung, wood-sash and two bow windows. This survey also noted a circa 1990 shed. (GAI Consultants, Inc. 2022). In December of 2022, Buckley House was surveyed by Tanner Haynes of POWER Engineers, Inc. This survey noted that the dwelling had a square plan and that some of the windows were aluminum (Haynes 2022). ERM attempted to visit the resource in January of 2026 but it was located at the end of a private drive and was not visible from the public ROW (Appendix 4, Figure 8). However, desktop review showed no apparent changes since the previous survey.

In December of 2022, 118-5717 was recommended potentially eligible under Criterion C (Haynes 2022). The resource was again recommended potentially eligible under Criterion C by the VDHR in 2023 (VDHR 2023). ERM recommends the resource locally significant for the purposes of this report. The resource is located within the ROW for the Proposed Route.

3.5 HISTORIC RESOURCE FINDINGS FOR THE PROPOSED ROUTE

3.5.1 005-5336, BETHEL/SALT CREEK

Bethel/Salt Creek is crossed by the Proposed Route (Attachment 5, Figure 1). The Proposed Route crosses area consists of the existing transmission line flanked by dense vegetation. An existing gas pipeline also intersects the resource.

One simulation was prepared for the resource at KOP 101 along Monacan Park Road, approximately 0.5 mile to the southeast of the resource (Attachment 5, Figure 2). This location was chosen as it was the closest point to the resource from a public ROW. As shown in the simulation, the Proposed Route would not be visible from this location due to distance and intervening vegetation.

As access to the resource was not available, ERM conducted additional modeling using the vegetated viewshed analysis. This analyzes vantage points across the resource and in the surrounding area looking towards the Proposed Route. The model depicts where there is potential for any transmission structures to be visible and quantifies the number of structures likely to be visible. According to the analysis, only the areas immediately adjacent to the Proposed Route would be visible from within the resource boundary (Attachment 6, Figure 1). This is small in comparison to the resource as a whole. In addition, the Proposed Route would not be visible from any of the resource's standing structures.

Furthermore, ERM has included figures showing the existing and proposed structure heights (Attachment 6, Figures 2 and 3). Currently, the existing transmission line includes four structures (a 45-foot structure, two 60-foot structures, and a 65-foot structure) within the resource property. The Proposed Route would be rebuilt with three, approximately 72.5-foot tall structures on the resource property. These structures would only be visible when in close proximity to the Proposed Route due to dense vegetation. As the only extant structures from the community are at the southern boundary of the resource, by the James River, it is unlikely that visitors would see structures associated with the Proposed Route except when driving on Salt Creek Road, at its

intersection with the Proposed Route. Thus, ERM recommends that the Proposed Route would have a **Minimal Impact** on 005-5336, Bethel/Salt Creek.

3.5.2 009-0043, HOPE DAWN

Hope Dawn is located approximately 0.8 mile to the south of the Proposed Route (Attachment 5, Figure 3). In addition, the resource has an easement that is located approximately 0.3 mile to the south of the Proposed Route. The area between the resource and the route consists of the James River, a railroad, and dense vegetation.

One simulation was prepared for the resource at KOP 102, along Abert Road, approximately 0.3 mile to the south of the resource boundary (Attachment 5, Figure 4). This location was chosen because it was the closest point to the resource from the public ROW before the road turns private. As shown in the simulation, the route would not be visible due to intervening vegetation, topography, and distance.

As access to the resource was not available, ERM conducted additional modeling using the vegetated viewshed analysis. This analyzes vantage points across the resource and in the surrounding area looking towards the Proposed Route. The model depicts where there is potential for any transmission structures to be visible and quantifies the number of structures likely to be visible. According to the analysis, the Proposed Route would not be visible from the resource or easement (Attachment 6, Figure 1). ERM also included figures comparing the existing and proposed structure heights (Attachment 6, Figures 2 and 3). There are currently seven existing structures (one 45-foot, two 60-foot, three 65-foot, and one 75-foot) in the vicinity of the resource, while the Proposed Route would include five proposed structures (one approximately 65-foot and four approximately 72.5-foot) in the vicinity of the resource. The construction of the Proposed Route would include the removal of the seven existing structures, which would be replaced with only five structures that would not be visible from the resource or easement. Thus, ERM recommends that the Proposed Route would have **No Impact** on 009-0043, Hope Dawn.

3.5.3 009-5283, BOWLING ELDRIDGE HOUSE

The Bowling Eldridge House is transected by the Proposed Route on the resource's eastern boundary (Attachment 5, Figure 5). The area crossed consists of the existing transmission line, with dense vegetation and a maintained lawn bordered by the buck-and-rail fence.

Two simulations were conducted for the resource at KOP 103 and KOP 303A, along Fox Hill Road (Attachment 5, Figures 6 and 7). KOP 103 was taken at the intersection of the resource and Proposed Route, while KOP 303A was taken directly to the north of the dwelling. As shown in KOP 103, the Proposed Route would be visible; however, it is important to note that the existing transmission line is currently visible from this point. An existing 55-foot structure is currently located at the northern boundary of the resource (by the fence), while a second, 50-foot structure is located on the eastern end of the resource's boundary. The Proposed Route would involve the removal of the northern structure and the replacement of the eastern structure with an 86-foot structure. Although visible from the public road ROW, the proposed structure would not be visible from the dwelling itself. This is important because the dwelling and outbuildings were relocated to this area (where the Big Island – Reusens 69-kV Transmission Line currently exists) and the

landscape does not contribute to the resource’s NRHP-listing. As shown in KOP 303A, the removal of the existing structure on the northern edge of the resource boundary would ensure that the most prominent modern infrastructure associated with the transmission line is no longer visible. Thus, ERM recommends that the Proposed Route would have a **Minimal Impact** on 009-5283, Bowling Eldridge House.

3.5.4 118-0218, REUSENS DAM

The Reusens Dam is located approximately 595 feet to the east of the Proposed Route (Attachment 5, Figure 8). The area between the resource and the route consists of a hill and vegetation. One simulation was conducted for the resource, at KOP 104 along Old Trents Ferry Road (Attachment 5, Figure 9). As shown in the simulation, the route would not be visible from the resource due to the topography and intervening vegetation. Thus, ERM recommends that the Proposed Route would have **No Impact** on 118-0218, the Reusens Dam.

3.5.5 118-0224, VIRGINIA EPISCOPAL SCHOOL

Virginia Episcopal School is located approximately 0.6-mile south of the Proposed Route (Attachment 5, Figure 10). The area between the resource and the route consists of dense vegetation and residential homes. One simulation was conducted for the resource at KOP 105 along Williams Road (Attachment 5, Figure 11). This point was chosen as the roads inside the resource boundary are private and were not accessible during the survey. As shown in the simulation, the route would not be visible from the resource due to distance and intervening vegetation. Although the simulation was not taken from the northern portion of the resource boundary, the distance and dense vegetation between the resource and the route would obscure the route’s visibility. Thus, ERM recommends that the Proposed Route would have **No Impact** on 118-0224, Virginia Episcopal School.

3.5.6 118-5240, PRESBYTERIAN ORPHANS HOME

The Presbyterian Orphan’s Home is located approximately 0.7-mile to the southwest of the Proposed Route (Attachment 5, Figure 12). The area between the resource and the route consists of dense vegetation and residential homes. One simulation was conducted for the resource at KOP 106 along Williams Road (Attachment 5, Figure 13). As shown in the simulation, the route would not be visible from the resource due to distance and intervening vegetation. Thus, ERM recommends that the Proposed Route would have **No Impact** on 118-5240, the Presbyterian Orphans Home.

3.5.7 118-5546, CSX RAILROAD

The CSX Railroad is located approximately 510 feet to the east of the Proposed Route (Attachment 5, Figure 14). The area between the resource and the route consists of a hill and dense vegetation. One simulation was conducted for the resource at KOP 104, at the intersection of the railroad and Old Trents Ferry Road (Attachment 5, Figure 15). As shown in the simulation, the route would not be visible from the resource due to the topography and intervening vegetation. Thus, ERM recommends that the Proposed Route would have **No Impact** on 118-5546, the CSX Railroad.

3.5.8 118-5717, BUCKLEY HOUSE

The Buckley House is transected by the Proposed Route on the resource’s western boundary (Attachment 5, Figure 16). The area crossed consists of the existing transmission line flanked by dense vegetation. One simulation was conducted for the resource at KOP 107, along Old Trents Ferry Road (Attachment 5, Figure 17). This location was chosen because it was the closest point to the resource from the public road ROW. As shown in the simulation, the Proposed Route would be visible from Old Trents Ferry Road. It is important to note; however, that the existing transmission line is currently visible from this point, and the existing 55 foot structure would be replaced with a 68 foot structure. This change in height would be a minor viewshed change, as the ROW would not be widened and require no further vegetation cut. Thus, ERM recommends that the Proposed Route would have a **Minimal Impact** on 118-5717, the Buckley House.

3.6 ARCHAEOLOGY FINDINGS

No previously recorded archaeological sites were identified within the ROW for the Proposed Route.

4. CONCLUSION AND RECOMMENDATIONS

The pre-application analysis gathered information on archaeological and historic architectural resources that qualify for consideration according to the VDHR Guidelines for transmission line projects.

No known archaeological sites are located adjacent to or within the ROW for the Proposed Route.

Eight aboveground historic resources fall within the VDHR study tiers for the Proposed Route under consideration. A summary table of the number of resources impacted and the degree of impact is presented in Table 4.

TABLE 4 SUMMARY OF PROJECT IMPACTS ON HISTORIC RESOURCES IN THE VDHR TIERS FOR THE PROPOSED ROUTE

Proposed Route	Number of Considered Impact Resources in Impact Category				
	None	Minimal	Moderate	Severe	Total
	5	3	-	-	8

Final assessments of Project impacts will be dependent on the completion of identification-phase archaeological and historic structure surveys along the route selected by the SCC followed by review of survey results by VDHR and other consulting parties. For any resources where the agencies concur in a finding of moderate or severe impact, the Company will propose treatments to avoid, minimize, or mitigate those impacts. Treatment options for archaeological sites could include selective structure placement to avoid direct impacts on sites, minor route adjustments to avoid crossing sites, or archaeological data recovery. Treatment options for aboveground historic resources could include detailed site documentation, historic research, and historic preservation studies; preparation of digital media or museum-type exhibits on sites for public interpretation; installation of historic markers or signs; installation of vegetative screening; or contributions to historical preservation organizations or specific preservation projects. Additional mitigations could be identified through consultation with VDHR and other consulting parties.

4.1 PROPOSED ROUTE

Eight previously recorded historic resources meet the criteria specified in the Guidelines within the VDHR study tiers for the Proposed Route (Table 5). The Proposed Route would have no impact on five resources (009-0043, 118-0218, 118-0224, 118-5240, and 118-5546) and a minimal impact on three resources (005-5336, 009-5283, and 118-5717).

TABLE 5 IMPACTS ON HISTORIC RESOURCE IN THE VDHR STUDY TIERS FOR THE PROPOSED ROUTE

Buffer (miles)	Resource Category	Resource Number	Description	Impact
1.0 to 1.5	National Historic Landmarks	-	-	-
0.5 to 1.0	National Register Properties (Listed)	009-0043	Hope Dawn	None
		118-0224	Virginia Episcopal School	None
		118-5240	Presbyterian Orphans Home	None
	Battlefields and Rural Historic Districts	-	-	-
0.0 to 0.5	National Register - Eligible	118-0218	Reusens Dam	None
		118-5546	CSX Railroad	None
0.0 (within ROW)	National Register Properties (Listed)	009-5283	Bowling Eldridge House	Minimal
	Locally Significant	005-5336	Bethel/Salt Creek	Minimal
		118-5717	Buckley House	Minimal

Source: VDHR 2024

4.2 FUTURE INVESTIGATIONS

The next stage of assessing impacts on historic resources will be to conduct an identification-phase field survey to identify and assess resources along the specific route selected by the SCC that could be impacted by the Project. Survey will be conducted in accordance with the following guidelines:

- Guidelines for Assessing Impacts of Proposed Electrical Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia (VDHR 2008);
- Guidelines for Conducting Historic Resources Survey in Virginia (VDHR 2017);
- National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (National Park Service [‘NPS’] 1995).

The survey teams will be led by individuals meeting the Secretary of the Interior’s professional qualifications standards for archaeology and architectural history, respectively. Teams will traverse the length of the Project corridor, revisit previously recorded archaeological and historic architectural resources, and document additional as-of-yet unrecorded resources in the survey area as defined in the Guidelines for the Project design. The archaeological survey will adhere to VDHR survey standards (VDHR 2017) and will entail systematic coverage of the approved route. All material culture, including artifacts and features, that could be 50 years old or older will be recorded. Sites will be delineated within the proposed ROW and investigations will include subsurface testing sufficient to inform recommendations of potential eligibility for the NRHP under Criterion D. Each site will be fully documented with appropriate mapping, digital photography, and



artifact collection/analysis. Site forms will be prepared for VCRIS submittal along with full descriptions in the technical report. The historic architectural survey will likewise adhere to VDHR standards. While the NPS Bulletin 15 (NPS 1995) defines a historic property as a resource that is 50 years or older, for the purposes of this Project, survey will include those 45 years or older to accommodate the length of time needed to complete the permitting phase for the Project. Furthermore, the survey will also record those resources that may have reached significance prior to the 50 (45) year age in accordance with NPS guidance if they are integral parts of districts or have merit to be considered eligible for the NRHP on their own. Digital photographs will be taken to record resources' overall appearance and details. Sketch maps will be drawn depicting the relationship of dwellings to outbuildings and associated landscape features. Additional information on the structures' appearance and integrity will be recorded to assist in making recommendations of NRHP eligibility. Historic maps, aerial photographs, and tax assessor data will be consulted to assist in dating the resources. Resources identified in the field effort will be reported to the VDHR, VCRIS numbers will be obtained, and shapefiles and database information will be provided. Sufficient information will be collected to make recommendations for each identified historic resource regarding eligibility for listing on the NRHP and to assess Project impacts.

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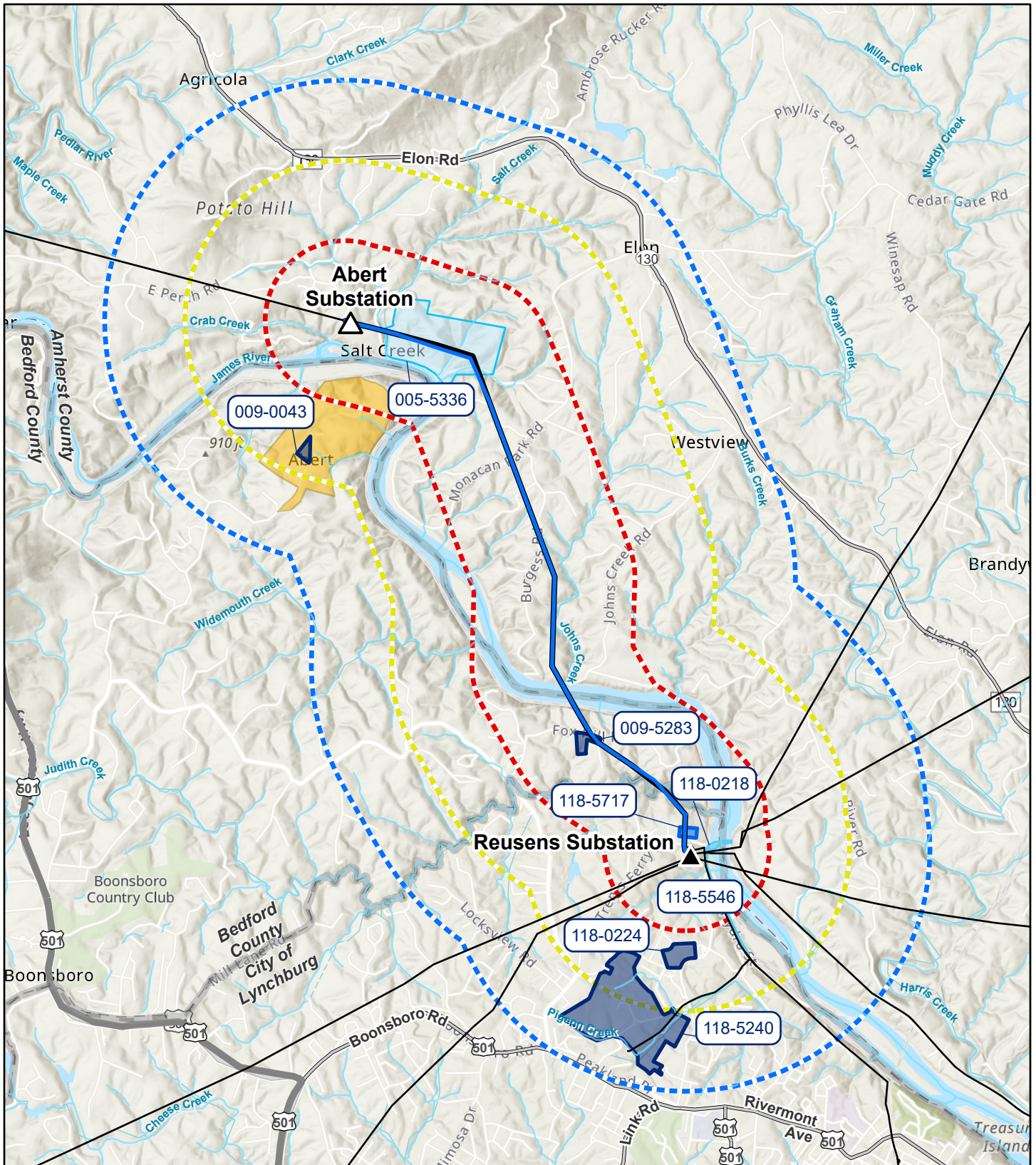
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ATTACHMENT 1 LOCATIONS OF CONSIDERED HISTORIC RESOURCES ASSOCIATED WITH PROJECT

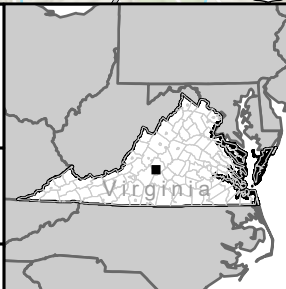


▲ Existing AEP Substation	■ 0.5-mile Buffer
△ Existing AEP Substation to be Upgraded	■ 1-mile Buffer
— Proposed Route	■ 1.5-mile Buffer
— Existing AEP Transmission Line	Architectural Resource (DHR)
■ Conservation Easement (VDHR)	■ Unevaluated, Locally Significant
	■ Eligible
	■ Potentially Eligible, Locally Significant
	■ NRHP Listed

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983

May 2026



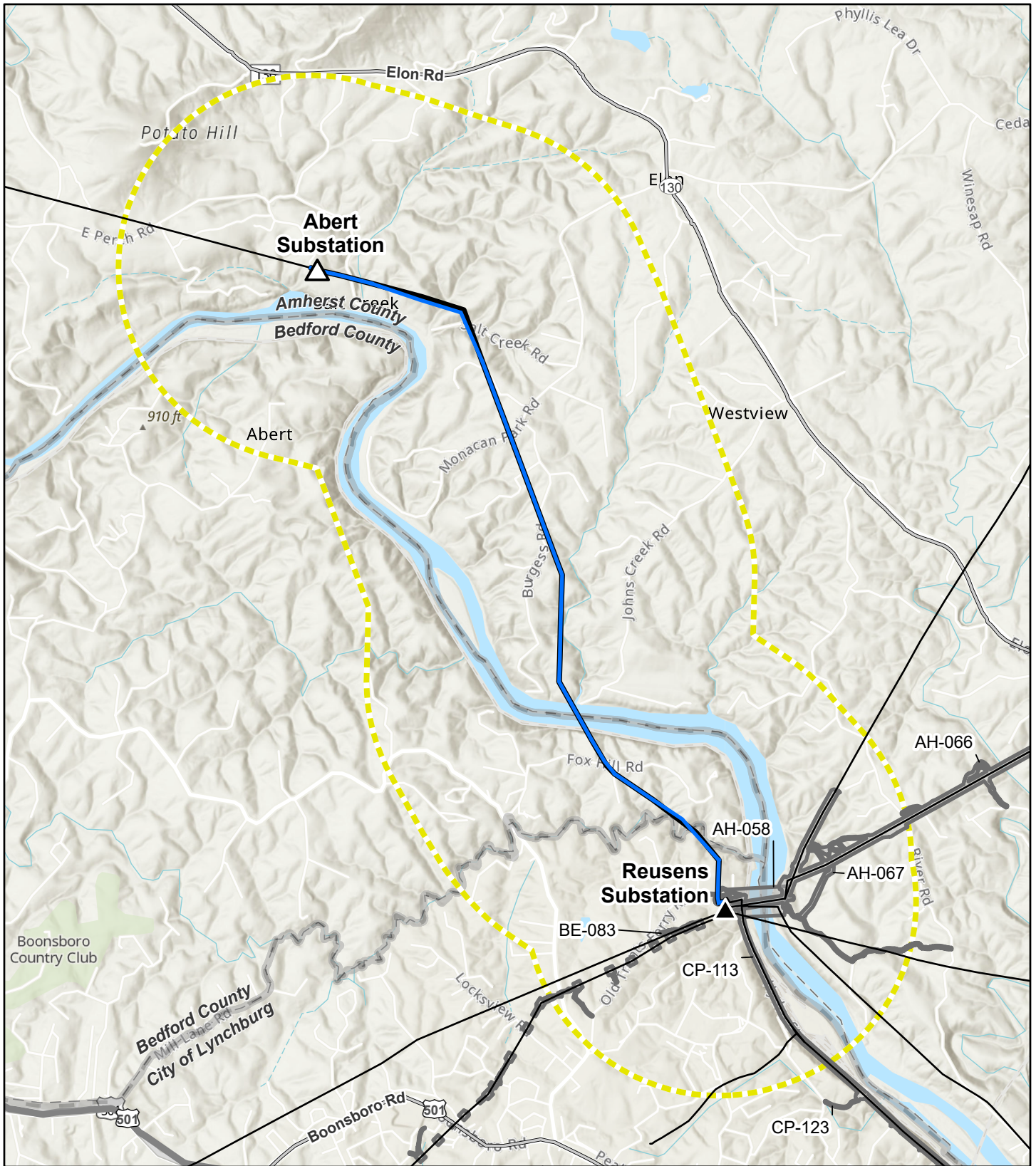
Attachment 1
Locations of Considered Historic Resources Along and Near Route

Abert - Reusens Transmission Improvements Project

0 0.5 1 1.5
Miles



ATTACHMENT 2 CULTURAL RESOURCES SURVEY WITHIN 1 MILE OF PROJECT

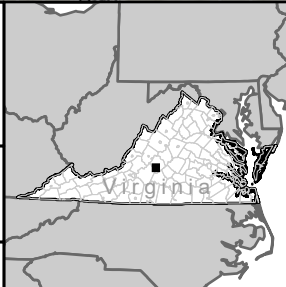


- ▲ Existing AEP Substation
- △ Existing AEP Substation to be Upgraded
- Proposed Route
- Existing AEP Transmission Line
- ▭ Phase 1 Survey
- ▭ 1-mile Buffer

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983

May 2026



Attachment 2
Cultural Resource Surveys
within 1 Mile of Project

APPALACHIAN POWER
An AEP Company

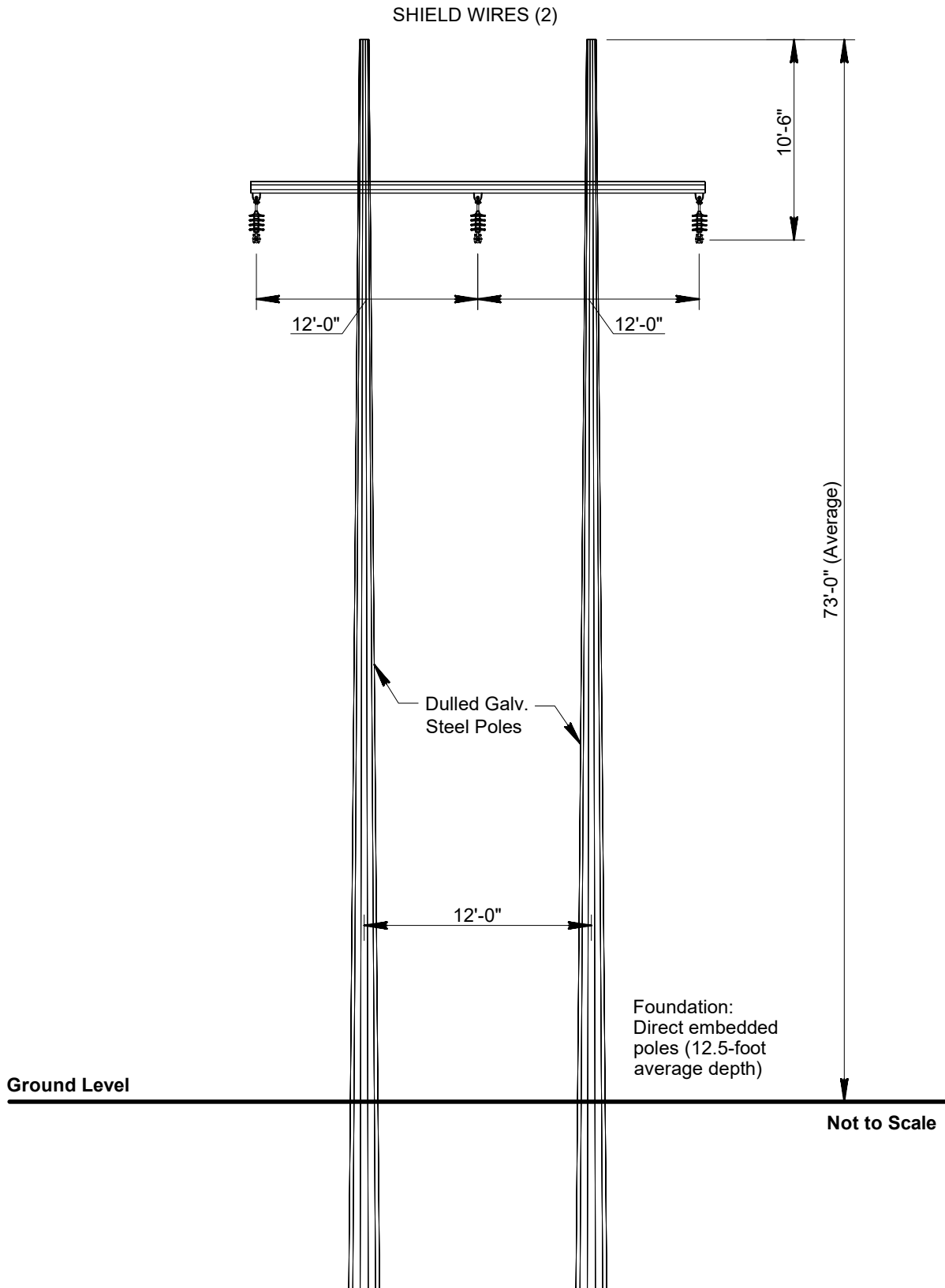
Abert - Reusens Transmission Improvements Project

0 0.5 1
Miles



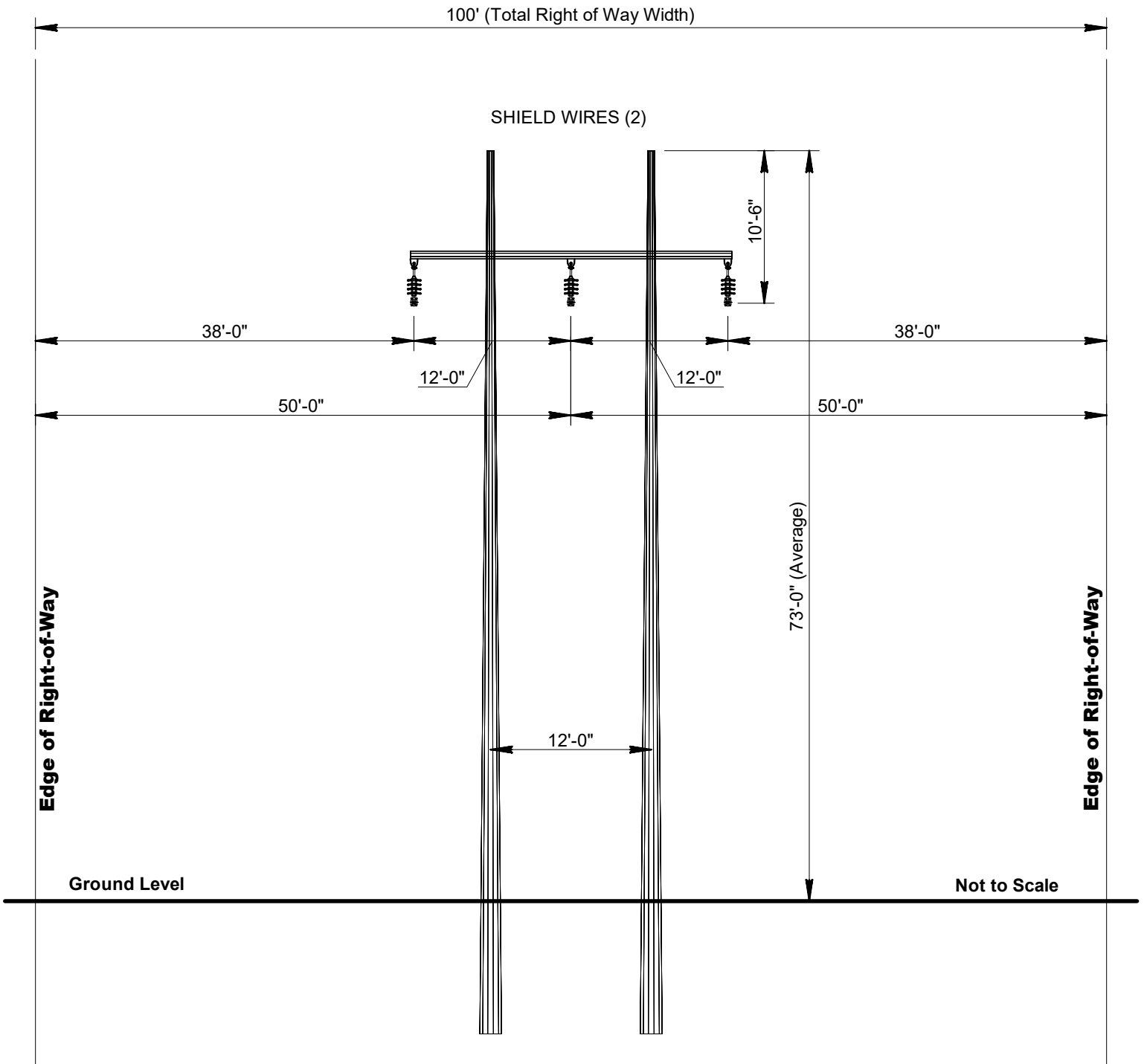
ATTACHMENT 3 TYPICAL STRUCTURE DESIGN AND LAYOUT

PROPOSED 69kV TRANSMISSION STRUCTURES (Page 1 of 9)
DULLED GALVANIZED STEEL H-FRAME STRUCTURE (SINGLE CIRCUIT)



TYPICAL SCHEMATIC

DULLED GALVANIZED STEEL H-FRAME STRUCTURE (SINGLE CIRCUIT)



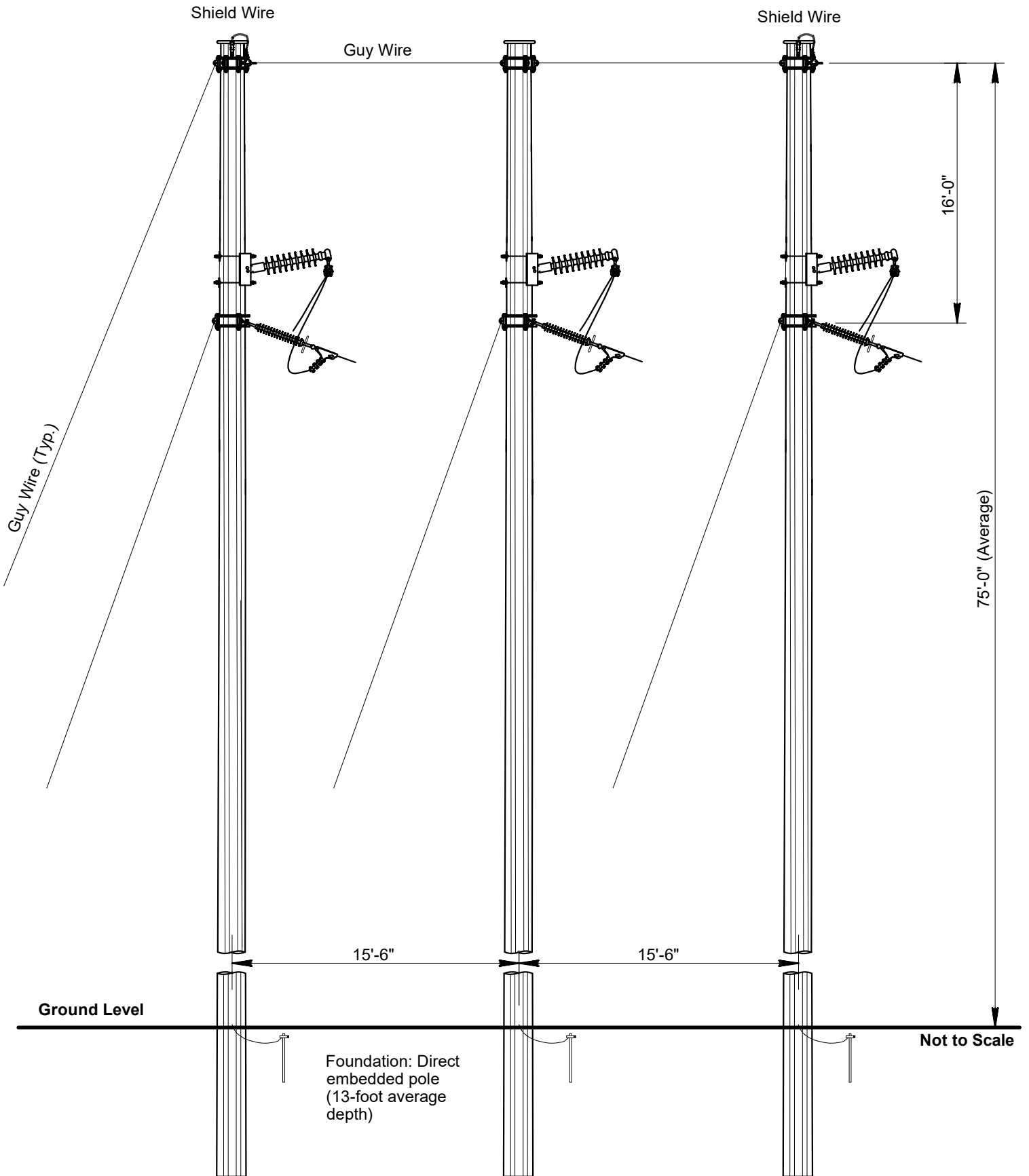
TYPICAL RIGHT-OF-WAY CROSS SECTION

PROPOSED 69kV TRANSMISSION STRUCTURES (Page 3 of 9)
DULLED GALVANIZED STEEL H-FRAME STRUCTURE (SINGLE CIRCUIT)



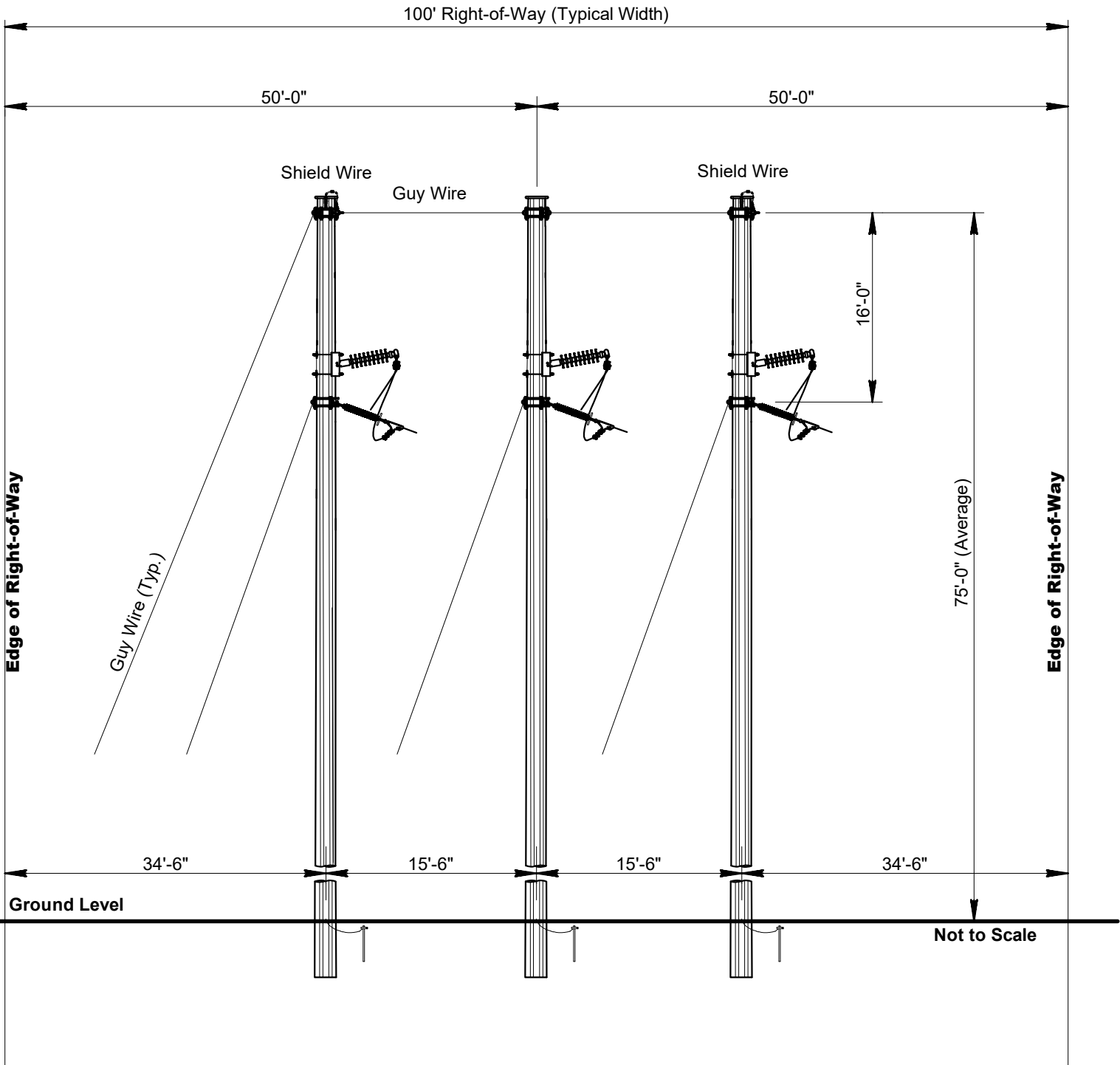
Note: The material for the proposed typical structure is dulled galvanized steel (as shown above).

PROPOSED 69kV TRANSMISSION STRUCTURES (Page 4 of 9)
DULLED GALVANIZED STEEL 3-POLE STRUCTURE (SINGLE CIRCUIT)



TYPICAL SCHEMATIC

PROPOSED 69kV TRANSMISSION STRUCTURES (Page 5 of 9)
DULLED GALVANIZED STEEL 3-POLE STRUCTURE (SINGLE CIRCUIT)



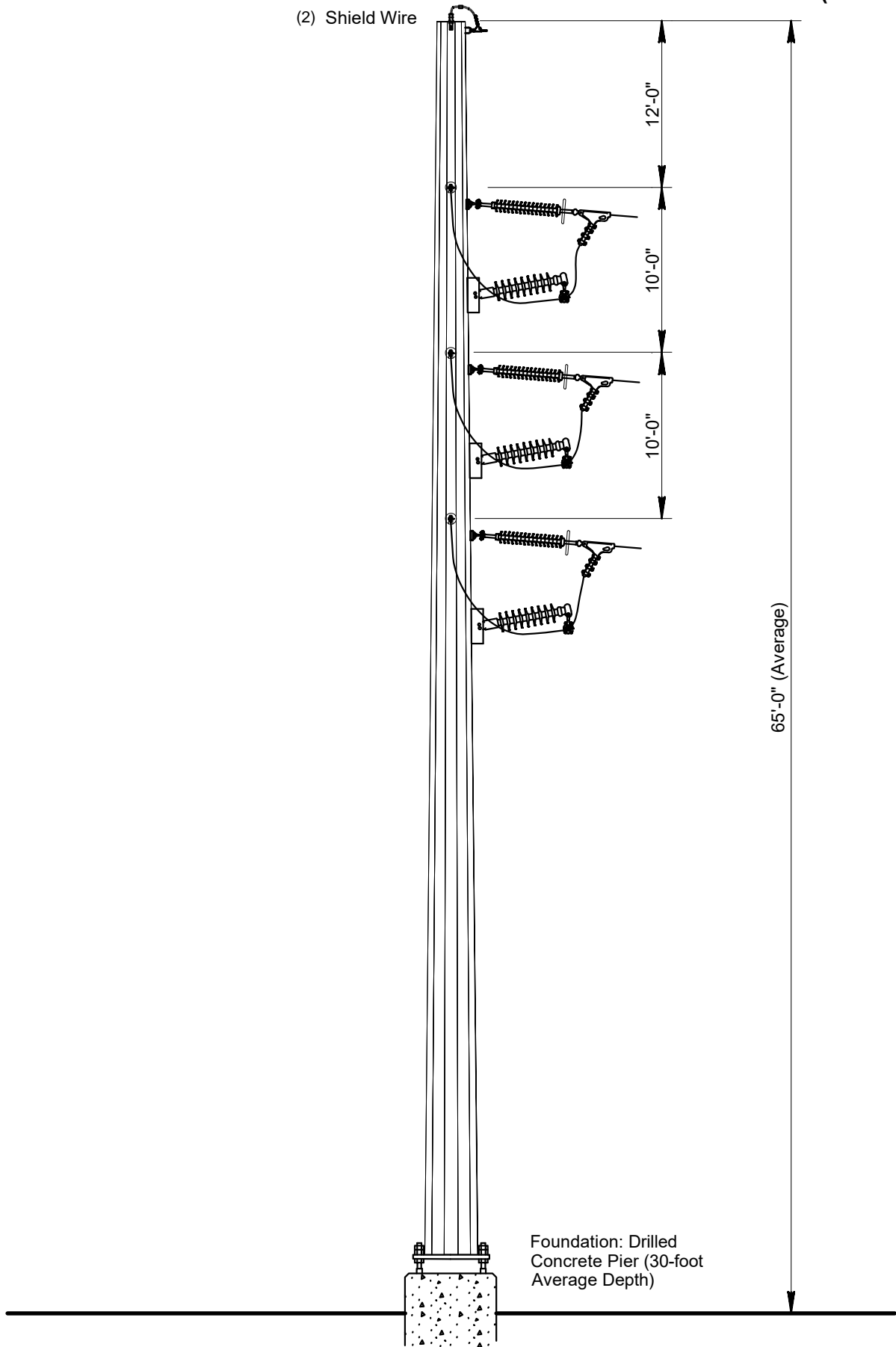
TYPICAL RIGHT-OF-WAY CROSS SECTION



COMPARABLE EXISTING STRUCTURE PHOTOGRAPH

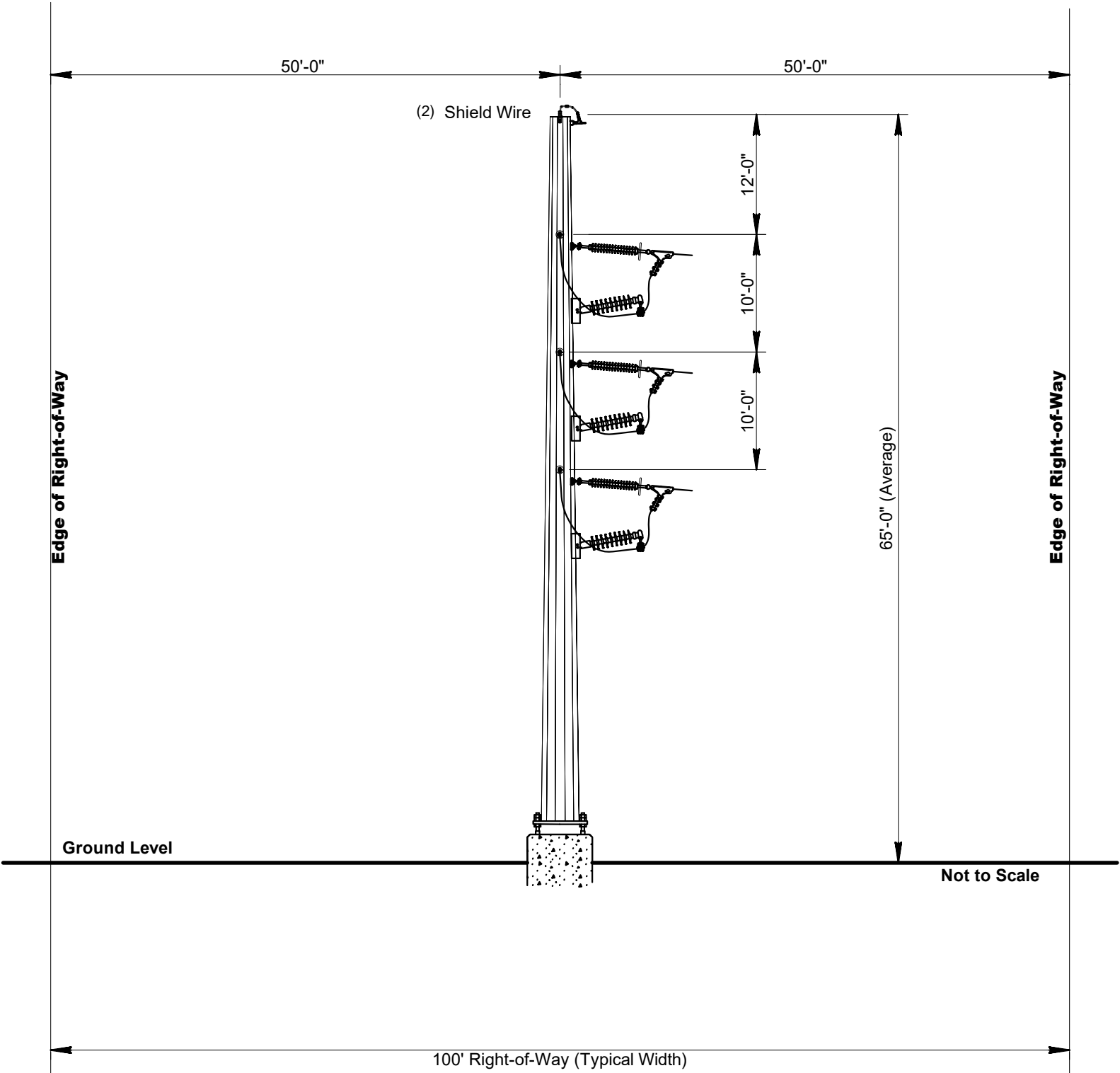
Note: The proposed material for the typical structure will be galvanized steel with a dulled finish (as shown above).

DULLED GALVANIZED STEEL MONOPOLE DEAD-END STRUCTURE (SINGLE CIRCUIT)



TYPICAL SCHEMATIC

PROPOSED 69kV TRANSMISSION STRUCTURES (Page 8 of 9)
**DULLED GALVANIZED STEEL MONOPOLE DEAD-END STRUCTURE
(SINGLE CIRCUIT)**



TYPICAL RIGHT-OF-WAY CROSS SECTION

PROPOSED 69kV TRANSMISSION STRUCTURES (Page 9 of 9)
**DULLED GALVANIZED STEEL MONOPOLE DEAD-END STRUCTURE
(SINGLE CIRCUIT)**



COMPARABLE EXISTING STRUCTURE PHOTOGRAPH

Note: The proposed material for the typical structure will be galvanized steel with a dulled finish (as shown above).



ATTACHMENT 4 HISTORIC RESOURCE PHOTOS

FIGURE 1 005-5336, BETHEL, NO VIEW TOWARD TAVERN, VIEW TO THE NORTHWEST AT THE INTERSECTION OF SALT CREEK ROAD AND MONACAN PARK ROAD

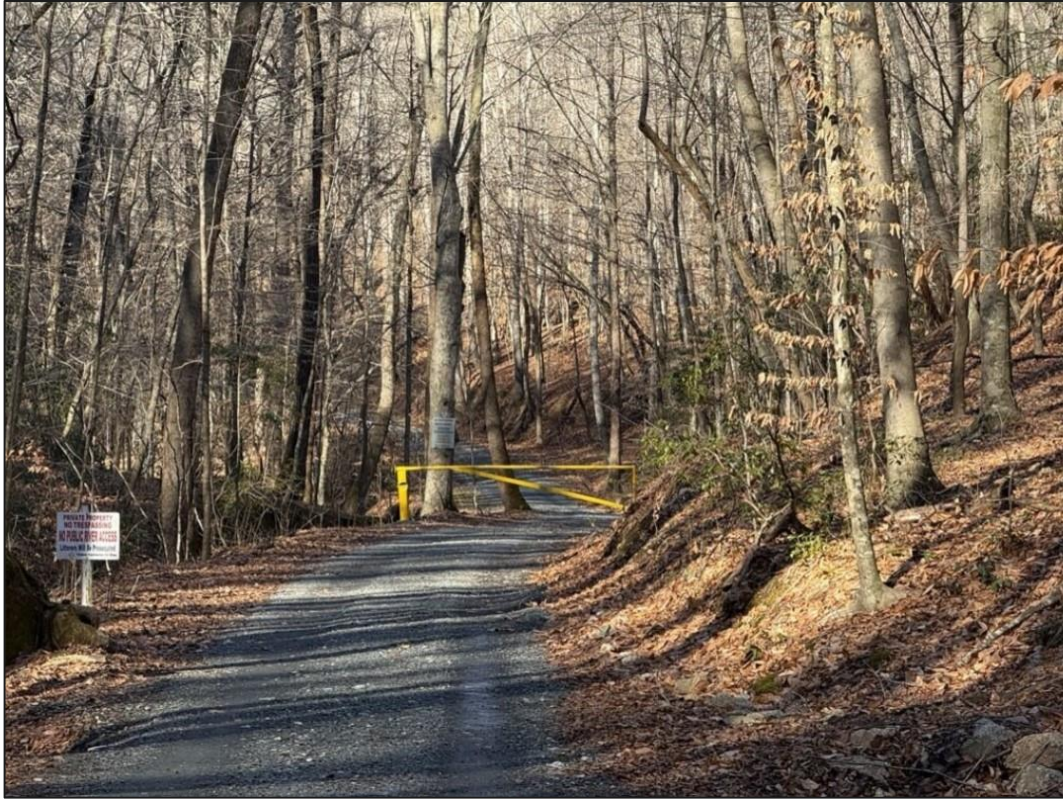


FIGURE 2 009-0043, HOPE DAWN, NO VIEW TOWARDS DWELLING, VIEW TO THE NORTHEAST ON ABERT ROAD



FIGURE 3 009-5283, BOWLING ELDRIDGE HOUSE, NORTH AND WEST ELEVATIONS, VIEW TO THE SOUTHEAST



FIGURE 4 118-0218, REUSENS DAM, DAM, SOUTHEAST ELEVATION, VIEW TO THE NORTHEAST



**FIGURE 5 118-0224, VIRGINIA EPISCOPAL SCHOOL HISTORIC DISTRICT, JETT HALL,
SOUTH ELEVATION, VIEW TO THE NORTH**



**FIGURE 6 118-5240, PRESBYTERIAN ORPHANS HOME, BAIN-WOOD ADMINISTRATION
BUILDING, SOUTHWEST AND SOUTHEAST ELEVATIONS, VIEW TO THE NORTHEAST**



FIGURE 7 118-5546, CSX RAILROAD, VIEW TO THE NORTHEAST ON OLD TRENTS FERRY ROAD

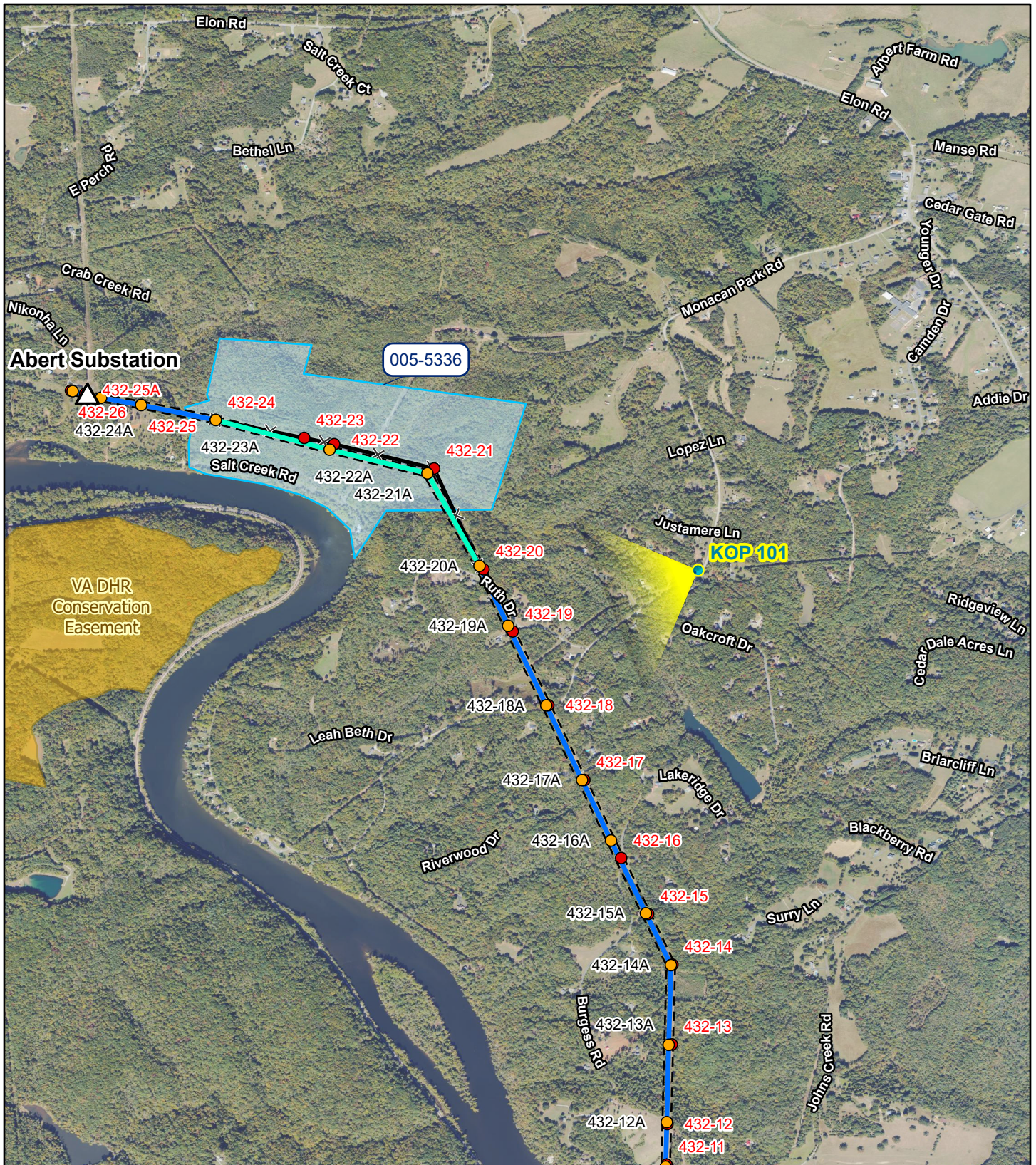


FIGURE 8 118-5717, BUCKLEY HOUSE, NO VIEW TOWARDS THE DWELLING, VIEW TO THE NORTHEAST ON OLD TRENTS FERRY ROAD





ATTACHMENT 5 PHOTO SIMULATIONS



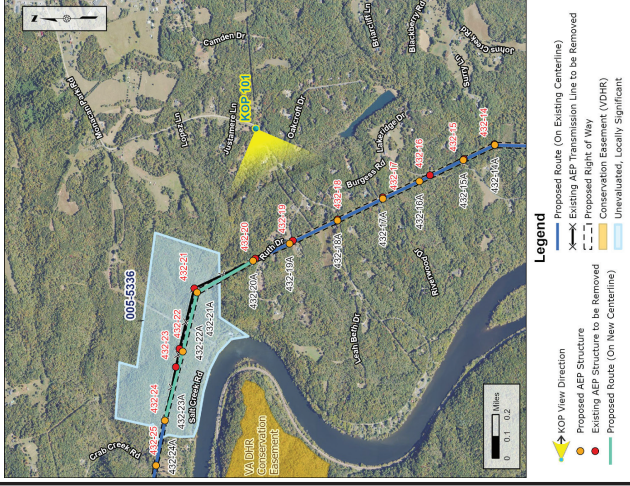
<ul style="list-style-type: none"> ▲ Existing AEP Substation △ Existing AEP Substation to be Upgraded ● Proposed AEP Structure (On New Centerline) ● Existing AEP Structure to be Removed — Proposed Route (On New Centerline) — Proposed Route (On Existing Centerline) 	<ul style="list-style-type: none"> ✕ Existing AEP Transmission Line to be Removed ▭ Proposed Right of Way ■ Conservation Easement (VDHR) □ Unevaluated, Locally Significant 	<p>Amherst and Bedford Counties, City of Lynchburg Virginia</p> <p>NAD 1983 StatePlane Virginia South FIPS 4502 Feet North America 1983</p> <p>May 2026</p>		<p>Figure 1 Aerial photograph depicting land use and photo view for 005-5336</p> <p>Abert - Reusens Transmission Improvements Project</p> <p>0 0.2 0.4 0.6 Miles</p>
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**Abert - Reusens Transmission
Improvements Project**
Appalachian Power
Amherst County, Virginia



KOP 101
Monacan Park Rd at Salt Creek Rd

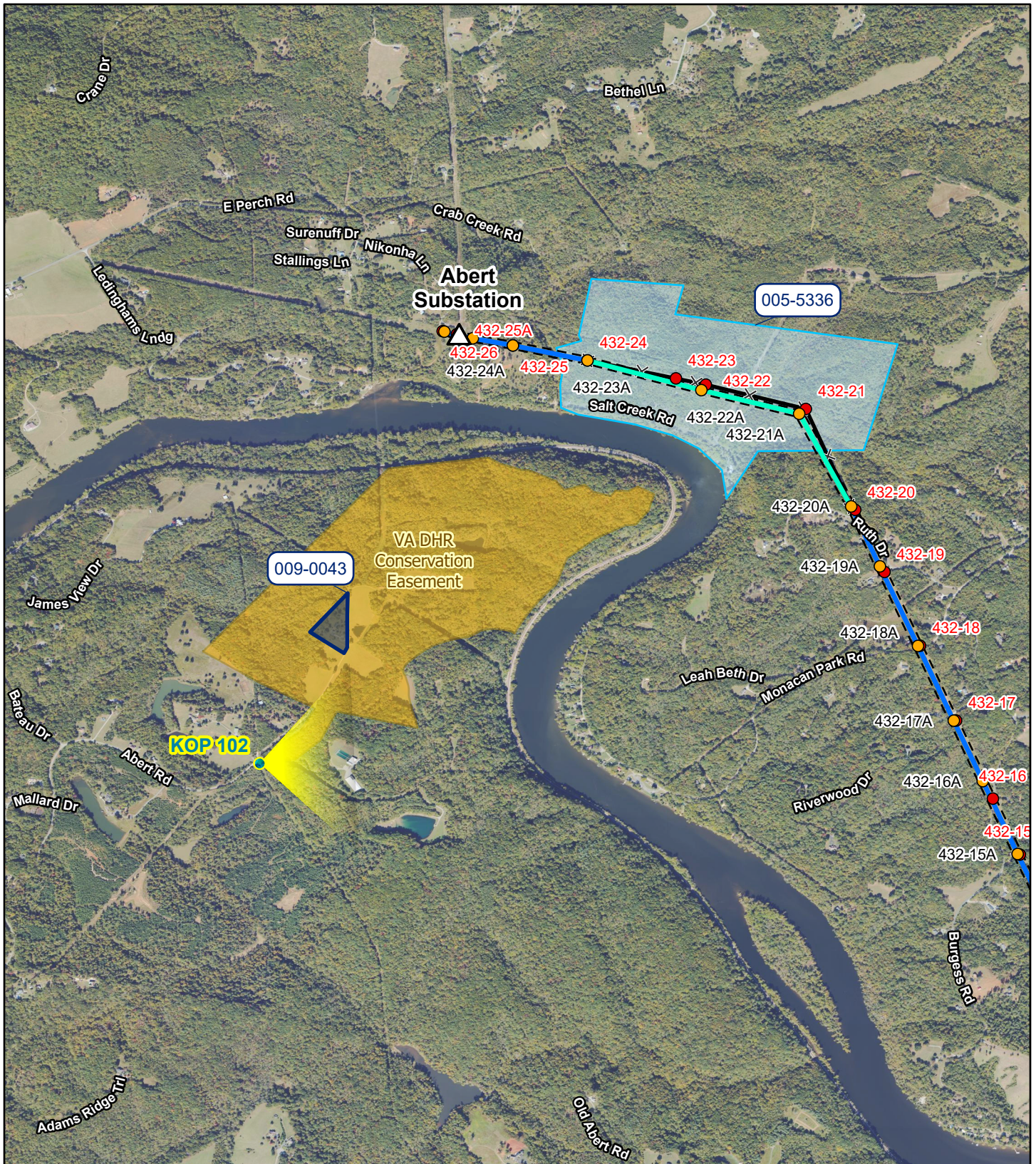
Figure 2
Route: Proposed Route
Date: 1/13/2026
Time: 12:36 pm
Viewing Direction: West
Distance to closest feature: 0.44 miles



EXISTING CONDITIONS



PROPOSED CONDITIONS



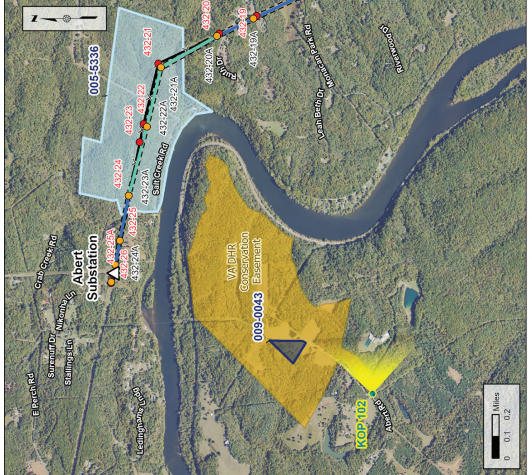
<ul style="list-style-type: none"> ▲ Existing AEP Substation △ Existing AEP Substation to be Upgraded ● Proposed AEP Structure ● Existing AEP Structure to be Removed — Proposed Route (On New Centerline) — Proposed Route (On Existing Centerline) 	<ul style="list-style-type: none"> ✕ Existing AEP Transmission Line to be Removed — Proposed Right of Way ■ Conservation Easement (VDHR) ■ Unevaluated, Locally Significant ■ NRHP Listed 	<p>Amherst and Bedford Counties, City of Lynchburg Virginia</p> <p>NAD 1983 StatePlane Virginia South FIPS 4502 Feet North America 1983</p> <p>May, 2026</p>		<p>Figure 3 Aerial photograph depicting land use and photo view for 009-0043</p> <p>APPALACHIAN POWER An AEP Company</p> <p>Abert - Reusens Transmission Improvements Project</p> <p>0 0.2 0.4 0.6 Miles</p>
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**Abert - Reusens Transmission
Improvements Project**
Appalachian Power
Bedford County, Virginia



KOP 102
Abert Rd at Red Hawk Rd

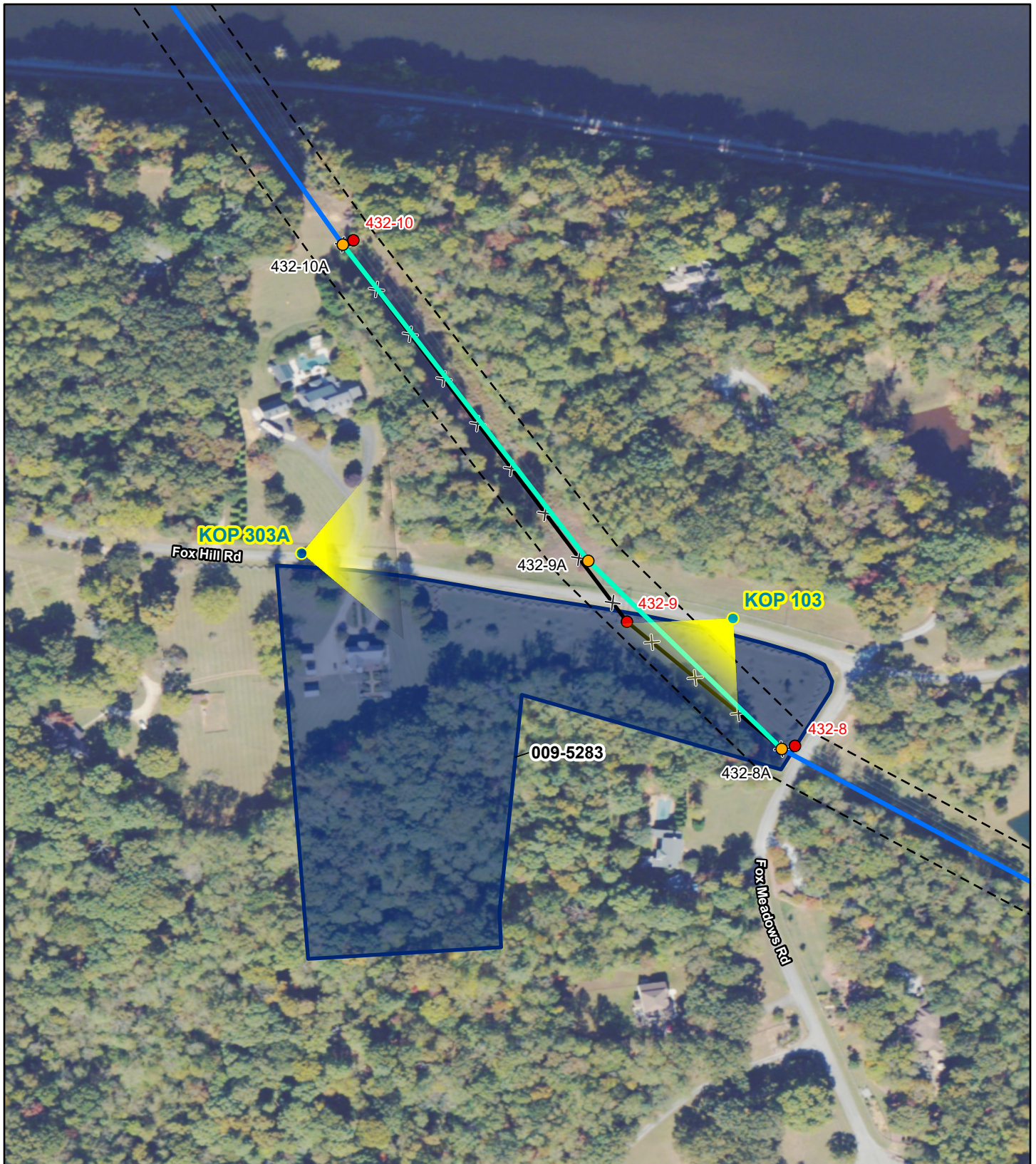
Figure 4
Route: Proposed Route
Date: 1/13/2026
Time: 2:13 pm
Viewing Direction: East
Distance to closest feature: 1.46 miles



EXISTING CONDITIONS



PROPOSED CONDITIONS



- Proposed AEP Structure
- Existing AEP Structure to be Removed
- Proposed Route (On New Centerline)
- Proposed Route (On Existing Centerline)
- Existing AEP
- ✕ Transmission Line to be Removed
- | Proposed Right of Way
- ▭ NRHP Listed

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983



May, 2026

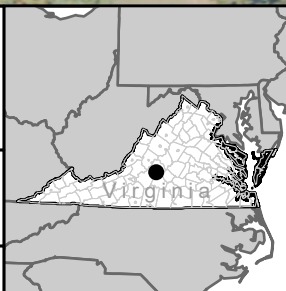
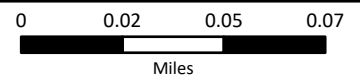


Figure 5
Aerial photograph depicting land use
and photo view for 009-5283

APPALACHIAN POWER
An AEP Company

**Abert - Reusens Transmission
Improvements Project**



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



KOP 103
Fox Hill Rd W of Fox Meadows Rd

Figure 6
Route: Proposed Route
Date: 1/13/2026
Time: 3:18 pm
Viewing Direction: Southwest
Distance to closest feature: 0.01 miles



Legend
 -> KOP View Direction
 - Proposed AEP Structure
 - Existing AEP Structure to be Removed
 - Proposed Route (On Existing Centerline)
 - Proposed Route (On New Centerline)
 - Proposed Right of Way
 - NRHP Listed

Note: Project components illustrated are based on proposed preliminary designs. The map is not intended to be used for legal purposes. The map is for informational purposes only and are not representative of scale and distance when viewed from the actual view point.



EXISTING CONDITIONS



PROPOSED CONDITIONS

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



KOP 303A
Fox Hill Rd W of Fox Meadows Rd

Figure 7
Route: Proposed Route
Date: 1/13/2026
Time: 2:52 pm
Viewing Direction: East
Distance to closest feature: 0.06 miles



Legend
 KOP View Direction
 Proposed AEP Structure
 Existing AEP Structure to be Removed
 Proposer Route (On New Centerline)
 Proposer Route (On Existing Centerline)
 Existing AEP Transmission Line to be Removed
 Proposed Right of Way
 NRHP Listed

Note: Project components illustrated are based on proposed preliminary designs. The locations of project components are shown in a general landscape context and are not representative of scale and distance when viewed from the actual view point.



EXISTING CONDITIONS



PROPOSED CONDITIONS



<ul style="list-style-type: none"> ▲ Existing AEP Substation △ Existing AEP Substation to be Upgraded ● Proposed AEP Structure ● Existing AEP Structure to be Removed — Proposed Route (On New Centerline) 	<ul style="list-style-type: none"> — Proposed Route (On Existing Centerline) — Existing AEP ✕ Transmission Line to be Removed — Proposed Right of Way — Eligible — Potentially Eligible, Locally Significant 	<p>Amherst and Bedford Counties, City of Lynchburg Virginia</p>		<p>Figure 8 Aerial photograph depicting land use and photo view for 118-0218</p>
<p>NAD 1983 StatePlane Virginia South FIPS 4502 Feet North America 1983</p> <p style="text-align: center;">May 2026</p>		<p style="text-align: center;">APPALACHIAN POWER <small>An AEP Company</small></p> <p style="text-align: center;">Abert - Reusens Transmission Improvements Project</p> <p style="text-align: center;">0 0.05 0.1 0.15 Miles</p>		

**Abert - Reusens Transmission
Improvements Project**
Appalachian Power
City of Lynchburg, Virginia



KOP 104

Old Trents Ferry Rd at Hydro Rd

Figure 9

Route: Proposed Route

Date: 1/14/2026

Time: 10:34 am

Viewing Direction: Northwest

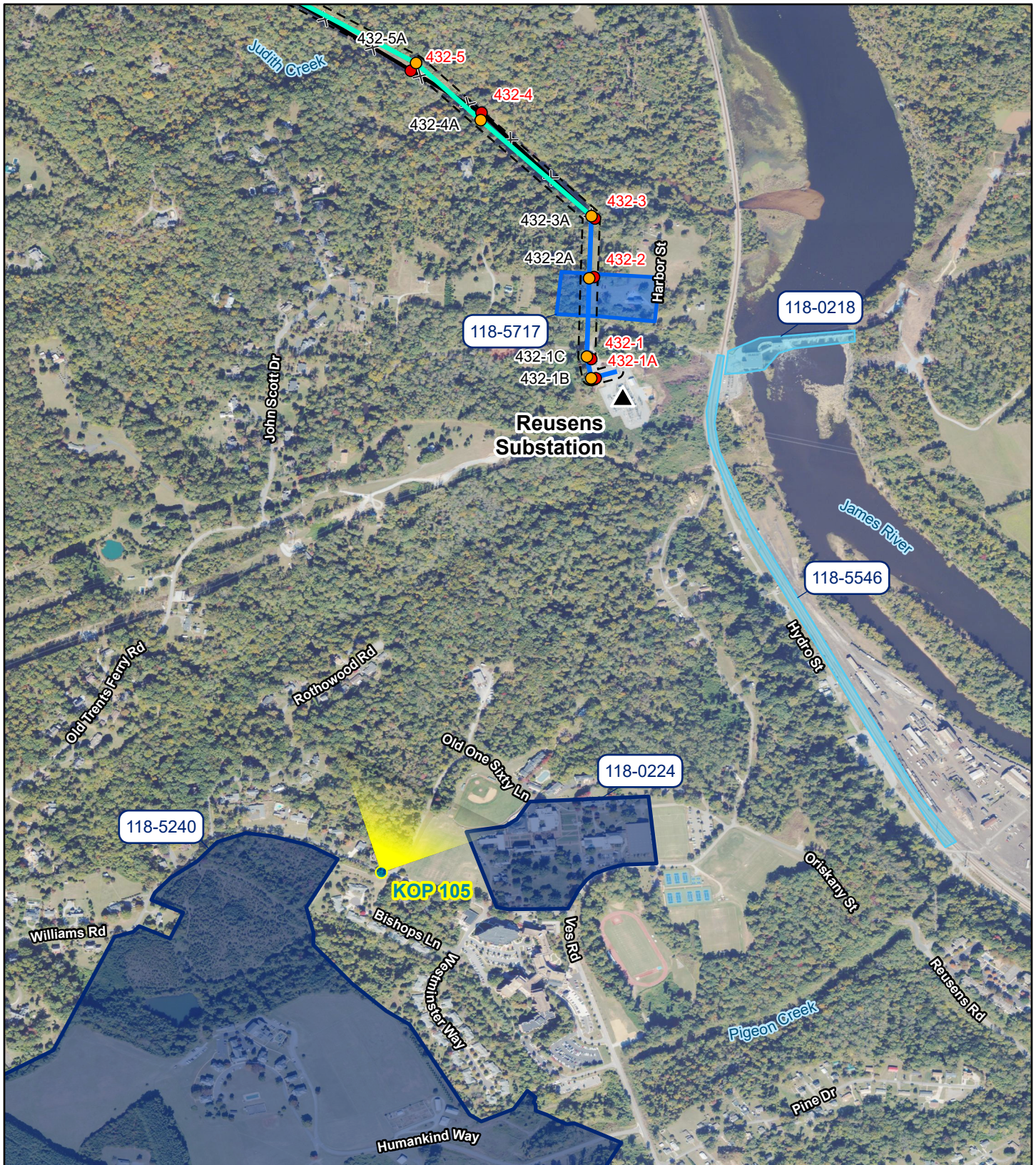
Distance to closest feature: 0.10 miles



EXISTING CONDITIONS



PROPOSED CONDITIONS



- ▲ Existing AEP Substation
- △ Existing AEP Substation to be Upgraded
- Proposed AEP Structure
- Existing AEP Structure to be Removed
- Proposed Route (On New Centerline)
- Proposed Route (On Existing Centerline)
- Existing AEP Transmission Line to be Removed
- Proposed Right of Way
- Eligible
- Potentially Eligible, Locally Significant
- NRHP Listed

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983

May 2026

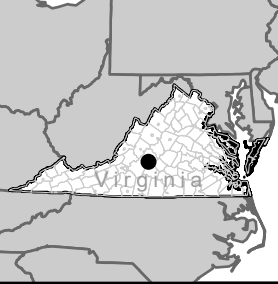


Figure 10
Aerial photograph depicting land use and photo view for 118-0224

APPALACHIAN POWER
An AEP Company

Abert - Reusens Transmission Improvements Project

0 0.1 0.2 0.3
Miles

**Abert - Reusens Transmission
Improvements Project**
Appalachian Power
City of Lynchburg, Virginia



KOP 105
Williams Rd NW of Old One Sixty Ln

Figure 11
Route: Proposed Route
Date: 1/14/2026
Time: 10:10 am
Viewing Direction: Northeast
Distance to closest feature: 0.71 miles



Legend

- KOP View Direction
- Existing AEP Structure
- Proposed AEP Structure
- Proposed Route (On New Centerline)
- Proposed Route (On Existing Centerline)
- Existing AEP Transmission Line to be Removed
- Proposed Right of Way
- Remotely Eligible, Locally Significant
- RHPL Listed

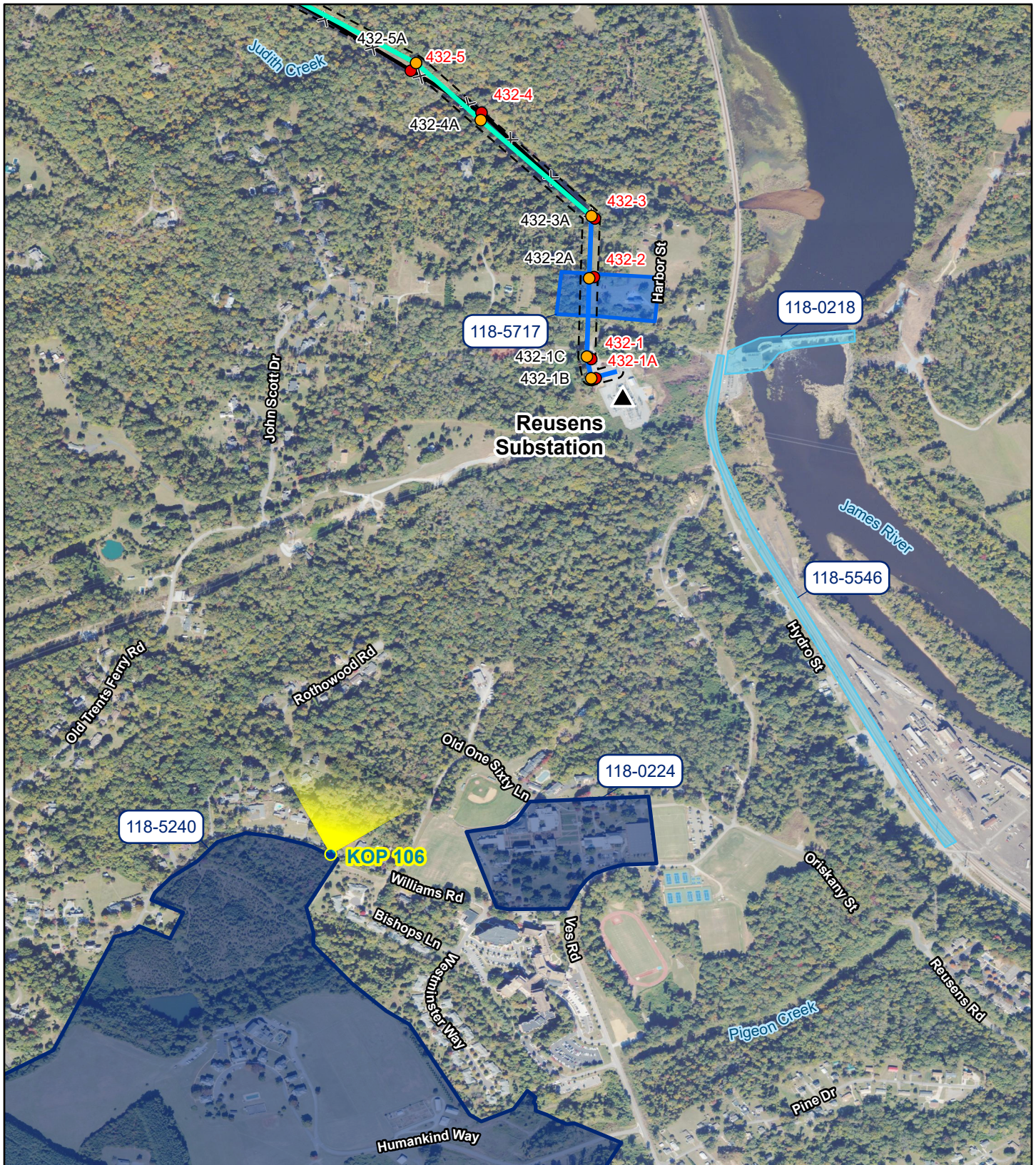
Note: Project components illustrated are based on proposed preliminary designs. The map is for informational purposes only and does not represent a final design. The map and are not representative of scale and distance when viewed from the actual view point.



EXISTING CONDITIONS



PROPOSED CONDITIONS



- ▲ Existing AEP Substation
- △ Existing AEP Substation to be Upgraded
- Proposed AEP Structure
- Existing AEP Structure to be Removed
- Proposed Route (On New Centerline)
- Proposed Route (On Existing Centerline)
- Existing AEP Transmission Line to be Removed
- Proposed Right of Way
- Eligible
- Potentially Eligible, Locally Significant
- NRHP Listed

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983

May 2026

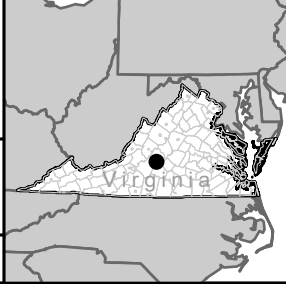


Figure 12
Aerial photograph depicting land use and photo view for 118-5240

APPALACHIAN POWER
An AEP Company

Abert - Reusens Transmission Improvements Project

0 0.1 0.2 0.3
Miles

**Abert - Reusens Transmission
Improvements Project**
Appalachian Power
City of Lynchburg, Virginia



KOP 106
Williams Rd NW of Old One Sixty Ln

Figure 13
Route: Proposed Route
Date: 1/14/2026
Time: 9:56 am
Viewing Direction: North
Distance to closest feature: 0.71 miles



Legend

- KOP View Direction
- Existing AEP Substation
- Proposed AEP Structure
- Existing AEP Structure to be Removed
- Proposed Route (On New Centerline)
- Proposed Route (On Existing Centerline)
- Existing AEP Transmission Line to be Removed
- Proposed Right of Way
- Potentially Eligible, Locally Significant
- RHP Listed

Note: Project components illustrated are based on proposed preliminary designs. The map is not intended to be used for construction purposes. The map is not representative of scale and distance when viewed from the actual view point.



EXISTING CONDITIONS



PROPOSED CONDITIONS



- ▲ Existing AEP Substation
- △ Existing AEP Substation to be Upgraded
- Proposed AEP Structure
- Existing AEP Structure to be Removed
- Proposed Route (On New Centerline)
- Proposed Route (On Existing Centerline)
- Existing AEP
- ✕ Transmission Line to be Removed
- Proposed Right of Way
- Eligible
- Potentially Eligible, Locally Significant

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983

May 2026

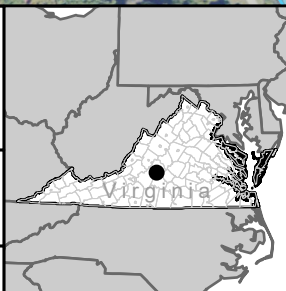


Figure 14
Aerial photograph depicting land use and photo view for 118-5546

APPALACHIAN POWER
An AEP Company

Abert - Reusens Transmission Improvements Project

0 0.05 0.1 0.15

Miles

Abert - Reusens Transmission Improvements Project
Appalachian Power
 City of Lynchburg, Virginia



KOP 104

Old Trents Ferry Rd at Hydro Rd

Figure 15

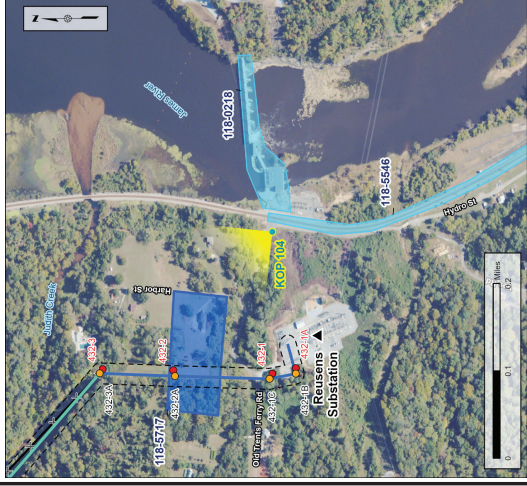
Route: Proposed Route

Date: 1/14/2026

Time: 10:34 am

Viewing Direction: Northwest

Distance to closest feature: 0.10 miles



Note: Project components illustrated are based on proposed preliminary designs. The map is not representative of scale and distance when viewed from the actual view point.



EXISTING CONDITIONS



PROPOSED CONDITIONS



<ul style="list-style-type: none"> ▲ Existing AEP Substation △ Existing AEP Substation to be Upgraded ● Proposed AEP Structure ● Existing AEP Structure to be Removed — Proposed Route (On New Centerline) 	<ul style="list-style-type: none"> — Proposed Route (On Existing Centerline) — Existing AEP ✕ Transmission Line to be Removed — Proposed Right of Way — Eligible — Potentially Eligible, Locally Significant 	<p>Amherst and Bedford Counties, City of Lynchburg Virginia</p>		<p>Figure 16 Aerial photograph depicting land use and photo view for 118-5717</p>
<p>NAD 1983 StatePlane Virginia South FIPS 4502 Feet North America 1983</p>		<p>May 2026</p>		

**Abert - Reusens Transmission
Improvements Project**
Appalachian Power
City of Lynchburg, Virginia



KOP 107

Old Trents Ferry Rd E of Anchor St

Figure 17

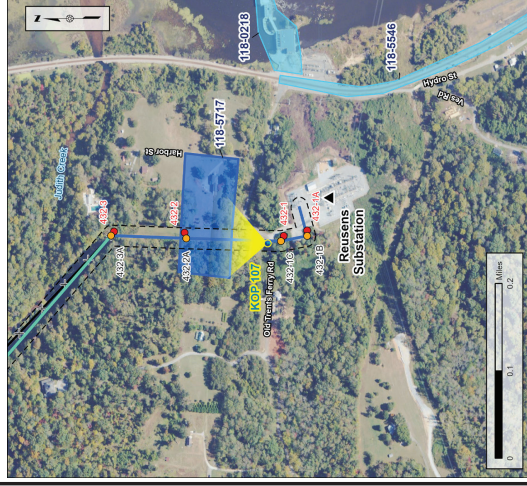
Route: Proposed Route

Date: 1/14/2026

Time: 10:50 am

Viewing Direction: North

Distance to closest feature: 0.00 miles



- Legend**
- KOP View Direction
 - Proposed Route (On Existing Centerline)
 - Existing AEP Substation
 - Proposed AEP Structure
 - Existing AEP Structure to be Removed
 - Proposed Route (On New Centerline)
 - Existing AEP Transmission Line to be Removed
 - Proposed Right of Way
 - Eligible
 - Potentially Eligible, Locally Significant

Note: Project components illustrated are based on proposed preliminary designs. The map is not intended to be used for construction purposes and is not representative of scale and distance when viewed from the actual view point.



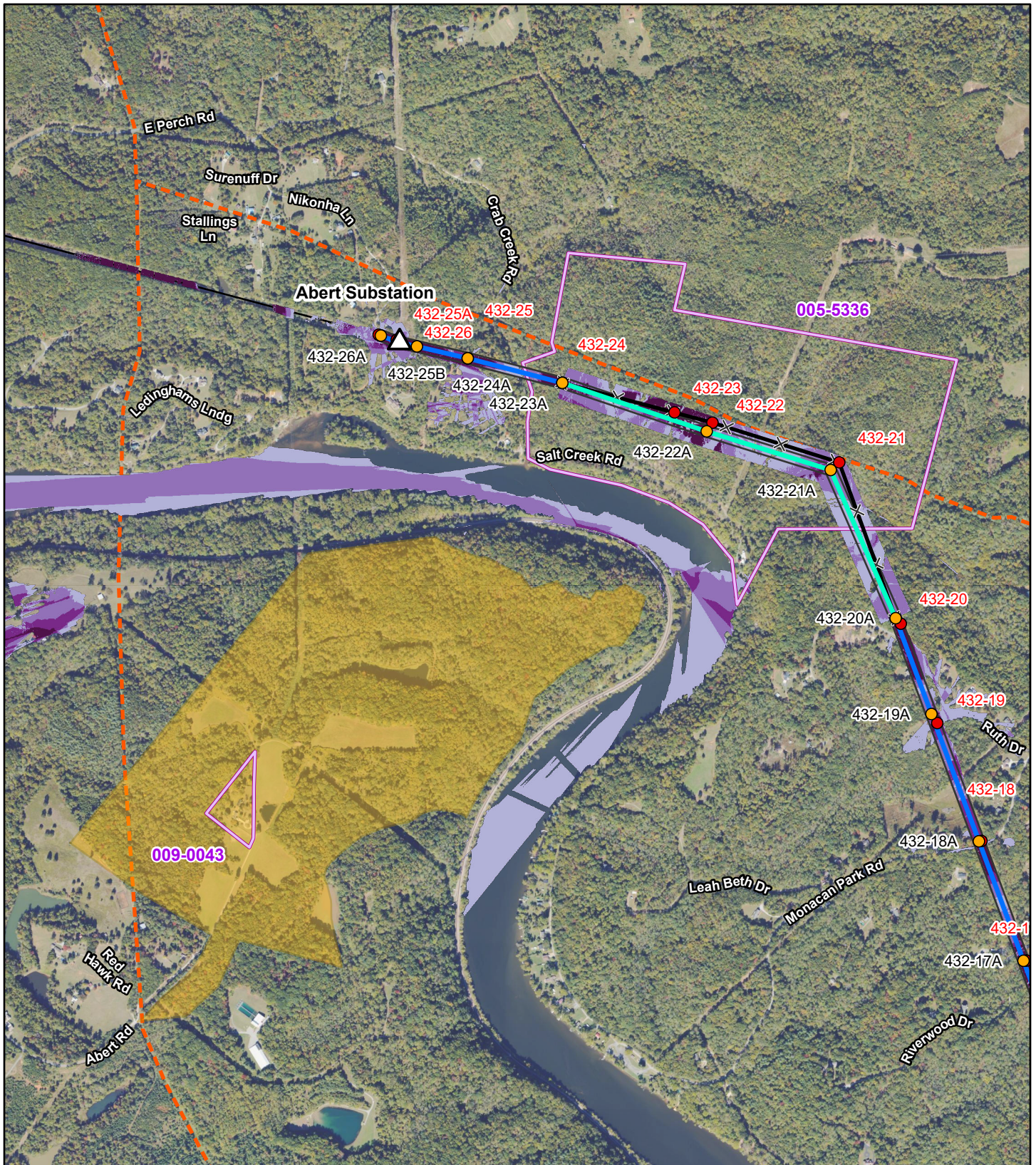
EXISTING CONDITIONS



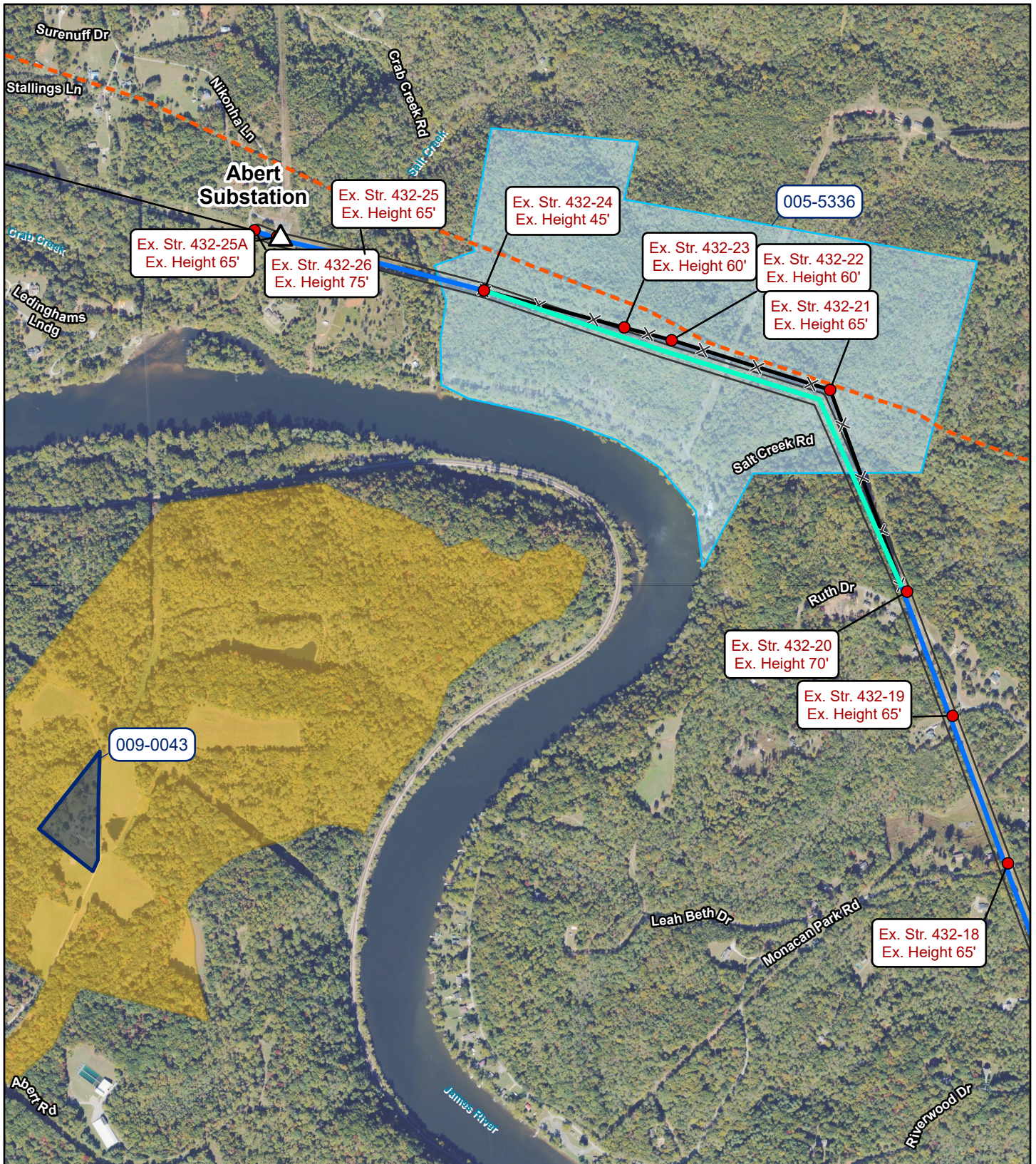
PROPOSED CONDITIONS



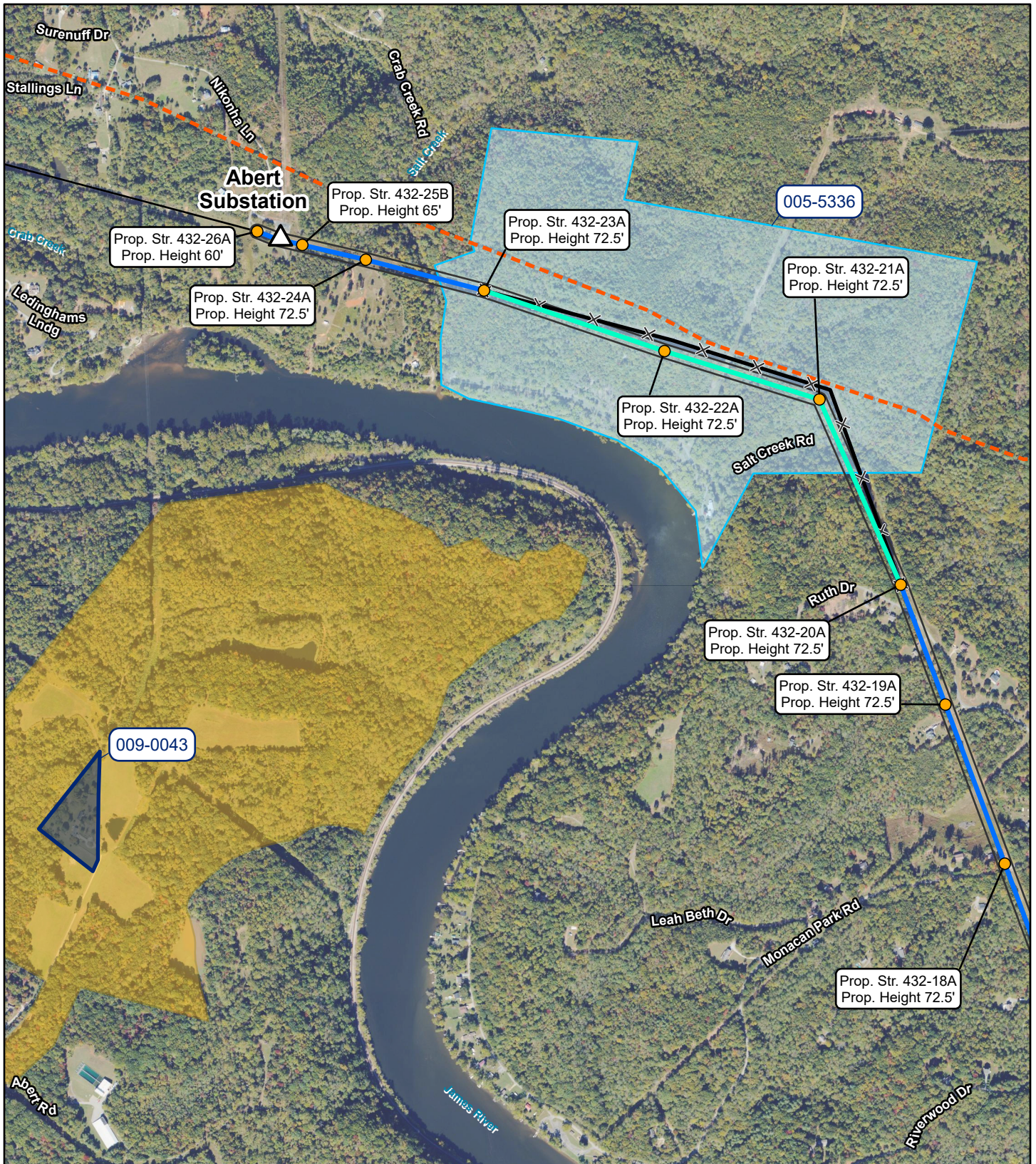
ATTACHMENT 6 VIEWSHED ANALYSIS AND STRUCTURE HEIGHTS



<ul style="list-style-type: none"> △ Existing AEP Substation to be Upgraded ● Proposed AEP Structure — Proposed Route (On New Centerline) — Proposed Route (On Existing Centerline) — Existing AEP ✕ Transmission Line to be Removed 	<ul style="list-style-type: none"> Architectural Resource (DHR) Conservation Easement (VDCR) <p>Viewshed Analysis</p> <ul style="list-style-type: none"> More Structures Visible One Structure Visible 	<p>Amherst and Bedford Counties, City of Lynchburg Virginia</p> <p>NAD 1983 StatePlane Virginia South FIPS 4502 Feet North America 1983</p> <p>May 2026</p>		<p style="text-align: center;">Figure 1 Viewshed Analysis</p> <p style="text-align: center;">Abert - Reusens Transmission Improvements Project</p> <p>APPALACHIAN POWER <small>An AEP Company</small></p> <p>0 500 1,000 1,500 2,000 US Feet</p>
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<ul style="list-style-type: none"> △ Existing AEP Substation to be Upgraded ● Existing AEP Structure to be Removed — Proposed Route (On New Centerline) — Proposed Route (On Existing Centerline) ✕ Existing AEP Transmission Line to be Removed 	<ul style="list-style-type: none"> □ Proposed Right of Way ■ Conservation Easement (VDCR) Architectural Resource (VDHR) □ Unevaluated, Locally Significant ■ NRHP Listed 	<p>Amherst and Bedford Counties, City of Lynchburg Virginia</p> <p>NAD 1983 StatePlane Virginia South FIPS 4502 Feet North America 1983</p> <p>May 2026</p>		<p>Figure 2 Existing Structure Heights Near 005-5336 and 009-0043</p> <p>Abert - Reusens Transmission Improvements Project</p> <p>APPALACHIAN POWER</p> <p>0 0.1 0.2 0.3 Miles</p>
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△ Existing AEP Substation to be Upgraded	--- Existing Natural Gas Line
● Proposed AEP Structure	□ Proposed Right of Way
— Proposed Route (On New Centerline)	■ Conservation Easement (VDCR)
— Proposed Route (On Existing Centerline)	Architectural Resource (VDHR)
× Existing AEP Transmission Line to be Removed	□ Unevaluated, Locally Significant
— Existing AEP Transmission Line	■ NRHP Listed

Amherst and Bedford Counties,
City of Lynchburg
Virginia

NAD 1983 StatePlane
Virginia South
FIPS 4502 Feet
North America 1983

May 2026

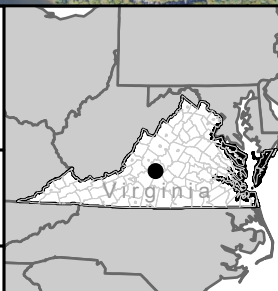


Figure 3
Proposed Structure Heights
Near 005-5336 and 009-0043

Abert - Reusens Transmission Improvements Project

0 0.1 0.2 0.3
Miles