



Department of Energy

Washington, DC 20585

October 15, 2026

Roger Kirchen
State Historic Preservation Officer
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

cc: Jennifer Bellville-Marrion
Project Review Archaeologist
Review and Compliance Division
Virginia Department of Historic Resources

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Appalachian Power Company, Gate City to Hill 69kV Transmission Line Rebuild Project, Scott County, Virginia

DHR File No.: 2026-3374

Dear Mr. Kirchen,

Pursuant to its authority under Title XVII of the Energy Policy Act of 2005, as amended, which established a Federal loan guarantee program, the U.S. Department of Energy (DOE) Office of Energy Dominance Financing (EDF) is evaluating whether to provide a Federal loan guarantee to Appalachian Power Company (APCo, or "the Applicant") for the Gate City to Hill 69 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Scott County, Virginia.

The purpose of this letter is to formally initiate consultation with the Virginia State Historic Preservation Officer (SHPO), represented by the Virginia Department of Historic Resources (VDHR) Review and Compliance Division, under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [U.S.C.] 306108), and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties." This letter presents descriptions of the undertaking, the Area of Potential Effects (APE), the efforts to identify historic properties, and the undertaking's effects on historic properties; and seeks your concurrence with DOE's Finding of No Adverse Effect for this Project.

Previous VDHR Review

APCo's consultant GAI Consultants, Inc. (GAI) previously submitted the Project to the VDHR to solicit comments as technical assistance for their environmental due diligence review (DHR File No. 2026-3374). In letters dated March 26, 2026, and June 23, 2026,

VDHR provided comments to GAI on the early drafts of the cultural resource survey reports for the Project. At that time, no Federal agency was involved in the Project. Now, the Project is before DOE EDF for consideration of a Federal loan guarantee. DOE EDF has reviewed the Project materials, the prior VDHR comments, and has confirmed that the Project is within the area previously surveyed and reported under DHR File No. 2026-3374. APCo and GAI were in the process of conducting additional fieldwork and reporting to address VDHR's comments when DOE EDF became involved with the Project. DOE EDF seeks to avoid duplicative VDHR review and/or interruption of the existing review for the Project under DHR File No. 2026-3374. As such, this agency consultation letter is intended to accompany GAI's submittal of revised cultural resource reports.

Description of the Undertaking

DOE's proposed action is the issuance of Federal financing to the Borrower for the undertaking (i.e., the Project), which involves rebuilding approximately 7.4 miles of existing transmission line infrastructure between the existing Gate City Substation and the existing Hill Substation. The Project will be constructed within the existing right-of-way (ROW) which varies in width between 60 and 120 feet. A reduction in total ROW acreage is projected due to a minor offset (ranging from one to four feet) between the existing and proposed ROW. This offset runs the full length of the Project, resulting in the addition of 1.06 acres of new ROW and the removal of 1.17 acres of relinquished ROW, yielding a net reduction of 0.11 acres of total ROW. A total of 65 existing transmission structures will be removed and replaced with 56 new transmission structures. All existing facilities, generally 55-foot-tall wood poles, will be removed and replaced with new structures, generally 85-foot-tall steel poles, and conductors.

AEP will employ temporary gravel and timber-matted pull pads and work pads that vary in width and length, where necessary, to install the structures and conductors. Work that extends outside of the proposed ROW will be temporary and any timber mats installed will be removed following the completion of the Project. Temporary access roads will consist of 15-foot-wide gravel or timber matting placed on top of the ground, and will be removed following the completion of the Project unless requested by the landowner. Construction activities consistent with transmission lines typically include erosion and sediment control, access roads, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, and restoration once construction is completed. Approximately 30.1 acres of tree clearing will be conducted in accordance with the applicable United States Fish and Wildlife Service (USFWS) tree clearing window and any other relevant environmental requirements.

Description of the Area of Potential Effects

As defined in the Section 106 regulations (36 CFR § 800.16(d)), the APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The dimensions of the APE are influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking. Within the APE, DOE distinguishes

different survey areas for identifying archaeological and historic architectural resources (hereafter, the “archaeological survey area” and “architectural survey area”). The archaeological survey area is defined as the construction footprint of the Project where potential physical effects caused by ground-disturbing activities may occur, also known as the limits of disturbance (LOD). The architectural survey area includes the area in the Project LOD and may apply a distance buffer, as appropriate, within which potential non-physical effects (e.g., visual, vibrational, auditory, or atmospheric) could occur. These survey areas collectively comprise the APE for the Project.

The Project’s archaeological survey area includes the area where potential ground disturbance would occur within the ROW corridor (approximately 84.64 acres) and all proposed temporary access roads and construction workspace extending outside the ROW (approximately 32.31 acres), totaling approximately 116.95 acres. The Project’s architectural survey area includes the area within the ROW plus the visible area within a 0.5-mile radius of the Project.

Description of Efforts to Identify Historic Properties

Tribal Outreach

In accordance with Section 106, DOE identified federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area. DOE has notified the following five (5) federally recognized Tribes to see if they have an interest in the Project: Cherokee Nation; Delaware Nation, Oklahoma; Eastern Band of Cherokee Indians; Monacan Indian Nation; and Muscogee (Creek) Nation.

By separate letter sent concurrently with this submission to the SHPO, DOE has requested Tribal respondents provide their comments on the undertaking, provide information regarding historic properties of religious or cultural significance to Tribes that may be present in the APE, and identify any additional Tribes that may share an interest in the Project area so DOE can promptly invite them to consult. DOE EDF will consider all comments received from Tribes during the 30-day consultation period and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is requested or necessary.

Records Search

As part of the Section 106 identification process, the Applicant contracted GAI Consultants, Inc. (GAI) to conduct cultural resource surveys. The results of GAI’s investigations are summarized below.

GAI conducted a search of the Virginia Cultural Resources Information System (V-CRIS) database and various archival sources to identify previously conducted surveys and previously recorded cultural resources and historic properties within a 1-mile radius study area surrounding the Project. This background research identified four (4) previous cultural resource surveys conducted in the study area, none of which overlap the Project APE. Four

(4) previously recorded archaeological sites are located in the study area, none of which are located within the Project ROW. Eighty (80) previously recorded architectural and historic resources are mapped within the 1-mile-radius study area, seventeen (17) of which are mapped within the APE or its immediate vicinity. Of these 80 resources, 22 are not eligible for listing in the National Register of Historic Places (NRHP), and the remaining 58 resources in the 1-mile-radius study area have not previously been evaluated for NRHP eligibility. No NRHP-listed historic properties or previously recorded historic cemeteries were identified within the study area.

Following the completion of background research, GAI completed Phase I cultural resources surveys to identify newly recorded archaeological sites and historic architectural resources within the APE. GAI prepared the initial draft cultural resources reports (separate archaeology and architecture survey reports) and submitted them to the VDHR for technical assistance as part of AEP's environmental due diligence review (DHR File No. 2026-3374). GAI has submitted revised technical reports to VDHR concurrently with this consultation letter. The results of the field investigations are summarized below.

Archaeological Resources

The archaeological field investigations consisted of pedestrian reconnaissance of the archaeological survey area employing visual inspection of the ground surface and subsurface testing where conditions allowed, following VDHR guidelines. Visual inspection of the APE was conducted to document local ground conditions and topographic settings which may affect archaeological potential. Areas characterized by existing ground disturbance (e.g., previous construction, existing roadways) and steep slopes (greater than 15 percent) within the Project APE were considered to have a low archaeological potential. These areas were mapped, photographed, and eliminated from systematic subsurface investigation. Relatively level to gently sloping, relatively well-drained, undisturbed settings were concluded to have a moderate to high archaeological potential and were subjected to systematic subsurface shovel testing. Subsurface shovel testing was conducted in the areas where conditions were suitable. During the initial survey, a total of 410 shovel test pits and were excavated in the APE. The survey identified three (3) new archaeological sites in the APE (44SC0212–0214), summarized below.

Site 44SC0212 (also DHR ID # 084-5454) is a historic-era cemetery that was identified in a proposed access road corridor. The site is considered not eligible for the NRHP, however, VDHR recommended avoidance in a prior comment letter dated March 26, 2026. In response to VDHR's comments on the initial survey report, the access road route was adjusted to avoid 44SC0212 and construction safety fencing will be installed between the access road and the cemetery's chain link boundary fence to ensure avoidance during Project construction. VDHR previously approved of these avoidance measures in a comment letter dated June 23, 2026.

Site 44SC0213 was also identified within an access road corridor. The site was delineated with close-interval shovel tests within the boundaries of the survey area, but it may extend beyond the Project's LOD, and thus 44SC0213 remains unevaluated for the NRHP;

however, the portion of 44SC0213 within the APE does not retain sufficient integrity to contribute to the site's overall eligibility, were it to be fully evaluated in the future. Therefore, the Project would not adversely affect this potential historic property. VDHR agreed and recommended no additional work for this site was necessary in its prior comment letters dated March 26 and June 23, 2026.

Site 44SC0214 was identified in the transmission line ROW within the proposed LOD for a proposed transmission structure location. The site was delineated with close-interval shovel tests within the boundaries of the survey area. In the prior comment letters, VDHR recommended additional work to identify deeply buried archaeological deposits or potential for such deposits to exist at this location. GAI's updated archaeological report includes the results of the deep testing investigation and confirms that APCo has redesigned the Project to eliminate the portion of the LOD at the location of site 44SC0214, thereby avoiding the site. Project mapping included in the archaeological report confirms APCo's removal of all Project workspace (access road and transmission tower) at this location. The site will now be spanned overhead with no potential for physical effects; therefore, site 44SC0214 is no longer within the APE and the Project will have no effect on this site.

In summary, three (3) archaeological sites were identified in the survey. Site 44SC0213 is unevaluated for the NRHP, but the Project will not adversely affect the site. Sites 44SC0212 and 44SC0214 will be avoided, and the Project will have no effect on them.

Historic Architectural Resources

The historic architectural survey included photographic documentation of above-ground resources in the APE that met the minimum 50-year threshold for NRHP consideration. The architectural survey identified a total of 97 resources in the APE, including 42 previously recorded and 55 newly recorded resources. Of the 97 surveyed resources, 93 are considered not eligible for listing in the NRHP. Per VDHR's opinion in its prior comment letters dated March 26 and June 23, 2026, four (4) previously recorded resources are considered potentially eligible for the NRHP: the Harris House (DHR ID #084-5393), the Starnes Bend Trestle Bridge and Starnes Tunnel (084-5438), the Clinchfield Railroad (Starnes Bend Segment; 084-5439), and the Norfolk Southern Railroad (324-5020). VDHR also requested additional documentation be provided to assess visual effects on the Harris House (084-5393).

Description of the Undertaking's Effects on Historic Properties

One (1) unevaluated archaeological resource (44SC0213) is within the APE. Although site 44SC0213 remains unevaluated for the NRHP, the area within the APE does not retain sufficient integrity to contribute to the site's overall eligibility, were it to be fully evaluated in the future. Therefore, the Project will have **no adverse effect**.

Four (4) potentially eligible historic architectural resources (DHR ID #s084-5393, 084-5438, 084-5439, and 324-5020) are within the APE; effects assessments for each are discussed below.

The Norfolk Southern Railroad (324-5020) is considered eligible under NRHP Criterion A as a representation of the region's transportation development during the late nineteenth century. The continued use of the railroad along its original route with original bridges, despite some modern modifications, demonstrates the resource's integrity and ability to convey significant historical themes. Because the Project is a rebuild of an existing transmission line, the Project would not create any new or novel visual intrusions or other changes to the setting in a manner that would diminish the integrity of its character-defining features, particularly the railroad's continued use of the original route and original bridges. Furthermore, the Project would not cause any physical changes to the features of the railroad that contribute to or convey its significance. The railroad and bridges will retain its ability to convey historical significance and retain integrity of location, design, materials, workmanship, and association. The Project will not diminish this property's ability to convey its significance under Criterion A. Therefore, the Project will have **no adverse effect**.

The Starnes Bend Trestle Bridge and Starnes Tunnel (084-5438) and the Clinchfield Railroad (Starnes Bend Segment; 084-5439) are considered eligible under NRHP Criterion A for their contribution to the economic development of southwest Virginia's coal region. Together, they highlight the immense engineering challenge of building a railroad through the mountainous terrain, a significant historical theme supporting eligibility under Criterion A. Because the Project is a rebuild of an existing transmission line, the Project would not create any new or novel visual intrusions or other changes to the setting in a manner that would diminish the integrity of the railroad's character-defining features, including the continued use of its original alignment and retention of many of its original elements, including bridges, tunnels, and viaducts. Furthermore, the Project would not cause any physical changes to the features of the railroad that contribute to or convey its significance. The railroad, bridge, and tunnel will retain its ability to convey historical significance and retain integrity of location, design, materials, workmanship, and association. The Project will not diminish these properties' ability to convey their significance under Criterion A. Therefore, the Project will have **no adverse effect**.

The Harris House (084-5393) is considered eligible under NRHP Criterion C because it is a good representation of the region's residential and agricultural development during the mid-nineteenth century, and it is an intact example of Classical Revival architecture that displays the inclusion of Folk/Gothic cutwork as part of the growing national trend in Victorian architectural styles. Because the Project is a rebuild of an existing transmission line, the Project would not create any new or novel visual intrusions or other changes to the setting in a manner that would diminish the integrity of the property's character-defining features. Furthermore, the Project would not cause any physical changes to the architectural features of the property that contribute to its significance under Criterion C. The house will retain its ability to convey historical significance and retain integrity of location, design, materials, workmanship, and association. The Project will not diminish this property's ability to convey its significance under Criterion C. Therefore, the Project will have **no adverse effect**.

Requesting your Concurrence and Next Steps

Based on DOE EDF's review of the efforts to identify historic properties and conclusions drawn from this information, DOE EDF is issuing a Finding of No Adverse Effect, consistent with 36 CFR § 800.5(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the Virginia SHPO, represented by the VDHR, on the Finding of No Adverse Effect as well as any comments you may have on the APE or the Project **within thirty (30) days of receipt of this letter**. In accordance with 36 CFR § 800.3(c)(4), DOE EDF will proceed if no response is received within 30 days.

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE EDF will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

We look forward to consulting with your office throughout the Section 106 process. If you have any questions or would like to discuss this project further, please contact me at 202-586-7272 or via email at EDF_Environmental@doe.gov.

Sincerely,

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WILLIAMSON

Alicia Williamson

Senior Environmental Manager

Office of Energy Dominance Financing

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