Department of Energy
Washington, DC 20585

October 30, 2026

Joseph Bell
Executive Director and State Historic Preservation Officer
Texas Historical Commission
P.O. Box 12276
Austin, Texas 78711

cc:
Jeff Salmon, Taylor County Historical Commission (via email)

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, American Electric Power, Elm Creek to Mulberry Creek 138 kilovolt Transmission Line Rebuild Project, Taylor County, Texas

Dear Mr. Bell,

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has executed a Federal loan guarantee agreement with American Electric Power (AEP or Borrower) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to AEP is intended to provide financing for many projects over the life of the Federal loan guarantee. Each project is reviewed and considered individually prior to being approved for financing under the Federal loan guarantee. AEP has identified the Elm Creek to Mulberry Creek 138 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Taylor County Texas, for potential inclusion in the loan guarantee.

The purpose of this letter is to formally initiate consultation with the Texas State Historic Preservation Officer (SHPO), represented by the Texas Historical Commission (THC), 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 a description 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. A cultural resources report is included as Attachment 1, and a Request for SHPO Consultation Form is included as Attachment 2.

The parties listed above that are copied on this letter are invited to participate as consulting parties to the Section 106 consultation and may provide their comments on the undertaking to DOE EDF. In accordance with the confidentiality provisions of the Section 106 regulations at 36 CFR 800.11(c), to avoid the disclosure of potentially sensitive cultural resources information to the public, DOE EDF has respectfully withheld Attachment 1

from dissemination to those members of the public invited to participate as consulting parties. DOE EDF has made this consultation letter available for public view to solicit comments from the general public on the undertaking.

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 5.7 miles of existing 138 kV transmission line in the general location of each existing pole structure within the existing 100-foot-wide right-of-way (ROW) between the Elm Creek and Mulberry Creek substations. A total of 58 existing transmission structures, generally 50-foot-tall wood poles, will be removed from the ROW and replaced with 54 new transmission structures, generally 80-foot-tall steel monopoles, and new conductor.

The Project also includes associated station modifications at Elm Creek and Abilene Industrial Park necessary to integrate the rebuilt transmission facilities into the existing transmission network. Station modifications at Elm Creek and Mulberry Creek include termination of the existing line and jumper upgrades. Station modifications at Abilene Industrial Park include jumper upgrades and installation of new motor-operated switches.

Existing roads and ROW will be used for construction. Activities include ROW preparation, foundation installation, steel structure erection, conductor installation, station modifications, and site restoration. Construction activities consistent with transmission lines typically include erosion and sediment control, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, and restoration activities following construction completion.

Project maps are provided in the cultural resources report that is included as Attachment 1.

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 EDF 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 5.7-mile-long and 100-foot-wide ROW corridor, within which all areas necessary for construction (e.g., pull pads and access roads) will be located, totaling approximately 69 acres. The Project's architectural survey area includes the ROW and the area within a 0.25-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: Apache Tribe of Oklahoma; Comanche Nation, Oklahoma; Delaware Nation, Oklahoma; Tonkawa Tribe of Indians of Oklahoma; and Wichita and Affiliated Tribes (Wichita, Keechi, Waco, and Tawakonie), Oklahoma.

By separate letter sent concurrently with this submission to the SHPO, DOE EDF has requested Tribal respondents to 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 to identify any additional Tribes that may share an interest in the Project area so DOE EDF 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 process, the Applicant contracted WSP, Inc. (WSP) to conduct cultural resource identification surveys. WSP prepared the cultural resources report that is included as Attachment 1 and summarized below.

Prior to the initiation of fieldwork, WSP conducted a file review for a 1-mile radius study area surrounding the Project. The online restricted-access Texas Historical and Archeological Sites Atlas was reviewed to identify previously recorded archeological and historical sites within the study area. In addition, previously recorded cultural resource data available online from the Texas Historical Sites Atlas were reviewed to identify the locations of historical sites, cemeteries, National Register of Historic Places (NRHP) properties, State Antiquities Landmarks, and Official Texas Historical Markers recorded within the study area. The Texas Department of Transportation (TxDOT) Historic Resources Aggregator was reviewed for resources that are listed or determined eligible for listing on the NRHP. NPS websites and data centers were reviewed to identify locations and boundaries for historic properties and historic trails. WSP also reviewed historical topographic mapping and aerial photography within the APE and study area.

The review indicated four (4) previous cultural resource surveys within the 1-mile radius study area, one of which intersects the current Project. A total of 20 previously recorded archaeological sites are documented within the 1-mile study area, none of which are

mapped within the Project ROW but two (2) of which are mapped adjacent to the Project corridor. One (1) NRHP-listed historic district was identified in the 1-mile study area but is located outside of the 0.25-mile APE. One (1) recorded cemetery is mapped within the 1-mile study area, but is outside 0.25-mile APE. No previously recorded historic architectural resources, Official Texas Historical Markers (OTHM), or State Antiquities Landmarks (SAL) are mapped within the 1-mile radius study area. A portion of one (1) historic highway is within the study area but is outside of the APE. The Project also intersects the mapped route of the Butterfield Overland National Historic Trail. Additional details and maps are provided in Attachment 1.

Following the completion of background research, WSP completed Phase I cultural resource surveys to identify newly recorded archaeological sites and historic architectural resources within the APE. The results of the surveys are provided in Attachment 1 and summarized below.

Archaeological Resources

A Phase I archaeological survey was conducted to identify archaeological resources within the Project ROW. The survey was conducted by qualified WSP archaeologists and in accordance with applicable state and federal guidelines. The survey consisted of pedestrian reconnaissance supplemented by subsurface shovel testing where field conditions allowed. A total of 256 shovel tests were excavated within the survey area. Due to shallow subsoils observed through shovel testing, no locations suitable for deep testing where potential preservation of deeply buried archaeological resources were identified.

Two (2) previously recorded archeological sites (41TA156 and 41TA459) were revisited and expanded during the investigation. These two sites appear to extend beyond the ROW and could not be fully delineated during the survey; however, the portions of 41TA156 and 41TA159 within the Project ROW do not retain sufficient integrity to contribute to either site's overall NRHP eligibility, and no additional work is warranted for these resources. A total of six (6) new archeological sites and three (3) isolated finds were recorded during the investigation. The isolated finds are considered not eligible for listing on the NRHP. Newly recorded sites 41TA491, 41TA492, 41TA493, 41TA494, 41TA495, and 41TA496 are surface artifact scatters. Site 41TA492 included one subsurface artifact recovered from shallow and disturbed plow zone soils. All six (6) sites appear to extend beyond the ROW and could not be fully delineated during the survey; however, due to the absence of features, diagnostic artifacts, and buried stratified cultural deposits, the portions of 41TA491, 41TA492, 41TA493, 41TA494, 41TA495, and 41TA496 within the Project ROW do not retain sufficient integrity to contribute to the site's overall NRHP eligibility, and no additional work is warranted for these resources.

Lastly, the records search identified that the Project ROW intersects the mapped route of the Butterfield Overland National Historic Trail. The trail's historic context is provided in Attachment 1. Review of aerial photographs and satellite imagery, pedestrian reconnaissance, and nine (9) shovel tests excavated in the trail's vicinity did not identify any intact or remnant features or associated cultural materials. Therefore, this portion of

the Butterfield Overland National Historic Trail does not retain sufficient integrity to contribute to the trail's overall historic significance, and the Project would have no effect on the Butterfield Overland National Historic Trail.

Additional details on the archaeological survey methods and results, maps, photographs, and shovel test descriptions are provided in Attachment 1.

Historic Architectural Resources

WSP conducted a reconnaissance-level survey to document historic-age architectural resources within the 0.25-mile radius APE. Prior to conducting fieldwork, USGS quadrangle maps and historic aerials were examined to identify potential historic structures within the APE. Direct line of sight observations were established by driving and walking public roadways to ascertain where existing structures and lines are visible, particularly near structures depicted on historic topographic and aerial maps, to identify and document buildings and structures within the Project line-of-sight.

Eleven (11) newly recorded historic aboveground resources and one historic district (Holiday Hills Subdivision; representative sample of 9 resources surveyed) were recorded within the APE. None of the resources are located within the Project ROW but are within the 0.25-mile viewshed radius surrounding the ROW. The newly recorded architectural resources included both commercial and residential above-ground historic-age structures constructed between 1954 and 1967, with one commercial structure constructed between 1967 and 1974. The architectural resources are stylistically indistinct commercial buildings and early twentieth-century architectural house designs that included Minimal Traditional and Ranch styles. None of the above-ground historic structures recorded during the survey indicate a significant association with events, patterns of history, or individuals, nor did they exhibit a distinct architectural style or rarity of preservation that would make them eligible for the NRHP, either individually or as contributing resources to a potential historic district. No further work is recommended for these resources.

Additional information and field photographs are included in Attachment 1.

Description of the Undertaking's Effects on Historic Properties

Two (2) previously recorded archeological sites (41TA156 and 41TA459) and six (6) newly recorded archaeological sites (41TA491, 41TA492, 41TA493, 41TA494, 41TA495, and 41TA496) were recorded during the survey. The sites were observed to extend outside of the limits of the survey area, and the site boundary could not be fully delineated during the field survey beyond the limits of the ROW; therefore, they each remain unevaluated for the NRHP. However, the investigated portions of the sites within the APE were found to lack integrity and significant information potential; therefore, the portions of these eight (8) sites within the APE would not be considered to contribute to the overall significance and potential eligibility of each site. Therefore, the proposed Project would have no adverse effect on these potential archaeological historic properties.

Requesting your Concurrence and Next Steps

Based on DOE's review of the efforts to identify historic properties and conclusions drawn from this information, DOE 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 Texas SHPO 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**.

The parties listed above that are copied on this letter are invited to participate as Section 106 consulting parties and may provide their comments on the undertaking to DOE EDF **within thirty (30) days of receipt of this letter**. In accordance with the confidentiality provisions of the Section 106 regulations at 36 CFR 800.11(c), to avoid the disclosure of potentially sensitive cultural resources information to the public, DOE EDF has respectfully withheld Attachment 1 from dissemination to those members of the public invited to participate as consulting parties. DOE EDF has made this consultation letter available for public view to solicit comments from the general public on the undertaking.

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 via email at EDF_Environmental@doe.gov.

Sincerely,

DONALD BROWN Digitally signed by DONALD BROWN
Date: 2026.10.30 09:55:50 -04'00'

Donald Brown
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:
Attachment 1. Cultural Resources Report
Attachment 2. Request for SHPO Consultation Form