



Department of Energy

Washington, DC 20585

March 20, 2026

Lisa D. Jones
Executive Director and State Historic Preservation Officer
468 South Perry Street
P.O. Box 300900
Montgomery, AL 36130

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Alabama Power Company, Bassett Creek to Sunny South 115 kV Transmission Line Rebuild Project, Clarke and Wilcox Counties, Alabama

Dear Ms. Jones,

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 Alabama Power Company (APC, or the Applicant) for the Bassett Creek to Sunny South 115 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Clarke and Wilcox Counties, Alabama.

The purpose of this letter is to formally initiate consultation with the Alabama State Historic Preservation Officer (SHPO) 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 Historic Properties Affected for this Project.

A cultural resources report is included as Attachment 1, and an Alabama Historical Commission (AHC) Review and Consultation Form is included as Attachment 2.

Description of the Undertaking

DOE's action is the issuance of a proposed Federal loan guarantee to the Applicant for the undertaking (i.e., the Project), which includes the proposed rebuilding of approximately 15.8 miles of the existing Bassett Creek-Sunny South 115kV Transmission Line within a 100-foot-wide right-of-way (ROW). The Project's southern terminus is located at the Bassett Creek transmission substation in Clarke County, and the Project ROW traverses northeast along an existing transmission line corridor before reaching the northern terminus at the Sunny South 115kV switching station in Wilcox County.

The Project scope involves the installation of 94 replacement transmission structures and the construction of approximately 15.8 miles of 115kV overhead electric transmission line. Because the existing transmission line was originally constructed at an offset from the existing ROW centerline, vegetation clearing is proposed on the southeastern side of the ROW to allow APC to rebuild the transmission line in the center of the existing 100-foot ROW. This vegetation clearing will occur along the length of the 15.8-mile Project ROW and will not extend more than 40 feet from the existing cleared corridor; vegetation clearing is not expected to exceed 14 acres.

Since the Project will occur within an existing transmission line ROW, existing access roads will be used to construct, operate, and maintain the Project when possible. Access to certain areas of the Project may require modifications to existing access roads or the installation of new access roads due to the age of the ROW. APC conducted surveys of the areas within and surrounding the Project to identify potential locations where the installation of new access roads, work pads, and/or laydown yards may be necessary. During these surveys, all areas of potential ground disturbance, including new access roads and work pads for installation and removal of structures, were evaluated for environmental impacts. Laydown areas necessary for Project construction will be located within the existing ROW, outside of environmentally sensitive areas, to the greatest extent possible in order to limit temporary impacts. Following construction, the area will be restored and stabilized in accordance with the Project's Construction Best Management Practices Plan and the Alabama Handbook for Erosion Control and Sediment Control and Stormwater Management on Construction Sites Urban Areas.

Additional description of the Project area and maps of the Project are provided in the cultural resource 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 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 a linear aspect along the length of the 15.8-mile ROW corridor where vegetation clearing would occur to widen the existing

ROW by approximately 40 feet, as well as the areas where ground disturbance may occur at the 94 identified transmission structure replacement locations, and potential locations where the installation of new access roads, work pads, and/or laydown yards may be necessary. The archaeological survey area totals approximately 76.1 acres.

The Project's architectural survey area is established in accordance with AHC guidelines based on the proposed height of the new transmission structures. This includes the area within the Project LOD, the area within a 1000-foot radius of new towers that would be less than 100 feet in height (85 of the 94 total transmission structures), and the area within a 0.25-mile radius surrounding towers that will measure over 100 feet in height (9 out of the 94 total transmission structures).

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

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 seven (7) federally recognized Tribes to see if they have an interest in the Project: Alabama-Coushatta Tribe of Texas; Alabama-Quassarte Tribal Town; Choctaw Nation of Oklahoma; Coushatta Tribe of Louisiana; Mississippi Band of Choctaw Indians; Muscogee (Creek) Nation; and Seminole Tribe of Florida.

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 and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is requested or deemed necessary to resolve objections.

Records Search

As part of the Section 106 identification process, the Applicant contracted the Office of Archaeological Research (OAR) at the University of Alabama to conduct cultural resource surveys. OAR prepared the cultural resources report that is included as Attachment 1 and summarized below.

OAR conducted a search of the Alabama Cultural Resources Online Database (ACROD), Alabama State Site File (ASSF), Alabama Register of Landmarks and Heritage (ARLH) and related supplements, and the National Register of Historic Places (NRHP) to identify previously conducted surveys and previously recorded cultural resources and historic properties within a 1-mile radius of the Project. This background research identified seven (7) previous surveys within a 1-mile radius of the Project. A total of 34 previously recorded

archaeological sites were identified within a 1-mile radius of the Project, all of which are outside the current Project's APE. No ARLH- or NRHP-listed historic properties are located within the 1-mile-radius study area. Lastly, five (5) cemeteries are located within the 1-mile search radius, one of which is approximately 67 meters (approximately 220 feet) northwest of the ROW in Wilcox County and is within the architectural survey area for the Project.

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

Archaeological Resources

The archaeological field investigations consisted of pedestrian walkover of the archaeological survey area employing visual inspection of the ground surface and subsurface testing where conditions allowed. Where visibility was limited, shovel tests were excavated at 30-meter intervals. Some portions of the linear survey route were not shovel tested due to the excessively sloping terrain encountered or areas where disturbance from prior silvicultural activities and subsequent erosion has removed near surface soil horizons. Such areas were deemed to have lower probability for archaeological preservation and were sampled at greater intervals of 60 meters.

A total of 387 shovel tests were excavated during the survey, only four (4) of which recovered cultural material. One new site (1Ck420) and one isolated find (IF-1) were documented through shovel testing, and one additional isolated find (IF-2) was identified through surface collection. The isolated finds are not considered eligible for inclusion in the NRHP. Site 1Ck420 is recommended not eligible for the NRHP due to the paucity of cultural material recovered, the small size of the site area, and the extent and depth of previous disturbance from logging activity. Therefore, no archaeological sites eligible for inclusion in the NRHP were identified within the APE. Additional details on the archaeological survey methods and survey results, as well as individual site descriptions and an archaeological site form for 1Ck420 are provided in the cultural resources report that is included as Attachment 1.

Historic Architectural Resources

The historic architectural survey included photographic documentation and completion of AHC Historic Building Survey Forms. Pre-field background research identified 55 potential historic architectural resources within the APE that were included in the field survey. Of these potential resources, twenty (20) resources were found to be no longer extant, five (5) were not of historic age, and five (5) were not visible from the public road ROW and were inaccessible. When multiple standing structures were located on the same parcel, the structures were combined into one documented resource. A total of 29 historic architectural resources were surveyed.

The surveyed historic architectural resources included dwellings (multiple bungalows, ranch houses, and vernacular houses), a commercial property (an abandoned gas station), a religious building (Calvary Church), a railroad crossing, and a cemetery. Four resources included multiple structures on a single parcel. One resource was a dilapidated one-story dwelling with most of its architectural features lost. Of the 29 newly recorded historic architectural resources, three (3) are recommended as NRHP-eligible. Individual resource descriptions and AHC Historic Building Survey Forms are included in Attachment 1.

Description of the Undertaking's Effects on Historic Properties

Three (3) historic architectural resources recommended eligible for the NRHP were identified in the APE for the Project. These include resources Ck00004 (a late 19th to early 20th century, one-story dogtrot), Ck00026 (a ca. 1880, one-story vernacular house), and Ck00027 (a ca. 1920 one-story tenant cottage). Each of these historic properties are recommended as eligible under NRHP Criterion C as a good example of American vernacular house architecture that was once commonplace in rural Alabama.

The increased height of the new replacement transmission line structures will not alter the viewshed of the identified historic properties due to the presence of mature intervening vegetation between the Project and the resources. All three (3) historic architectural resources recommended as NRHP-eligible are visually screened from the existing transmission line by mature forested areas. Additionally, while resource Ck00026 is recommended as NRHP-eligible, only the parcel boundary falls within the APE; the recommended-eligible farmstead structure is not located in the APE. Therefore, while there are historic properties present in the APE, the Project will have no effect on them.

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 Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1). As part of the Section 106 process, DOE requests the concurrence of the Alabama SHPO on the Finding of No Historic Properties Affected, as well as any comments you may have on the APE or the Project **within thirty (30) days of receipt of this letter**.

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE LPO 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 240-687-7266 or via email at LPO_Environmental@hq.doe.gov.

Sincerely,

Molly R. Cobbs
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. OAR Cultural Resources Report

Attachment 2. Alabama SHPO Project Review and Consultation Form