Department of Energy
Washington, DC 20585

November 17, 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, Gaston to Anniston 230kV Transmission Line Upgrade Project, Shelby, Talladega, and Calhoun Counties, Alabama

Dear Ms. Jones,

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has issued a Federal loan guarantee to Alabama Power Company (APC or Borrower) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to APC 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. APC has identified the Gaston to Anniston 230kV Transmission Line Upgrade Project (the Project), located in Shelby, Talladega, and Calhoun Counties, Alabama, for potential inclusion in the loan guarantee.

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 Adverse Effect 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 proposed action is the issuance of Federal financing to the Borrower for the undertaking (i.e., the Project), which includes upgrading 38.5 miles of existing 230 kV transmission line within its existing 100-foot-wide right-of-way (ROW). The Project end

points are a substation near the APC Gaston Steam Plant and the Bynum Transmission Substation. The Project will replace a small number of transmission line structures in the existing ROW (15 in total) in generally the same location as the existing structures and upgrading 38.5 miles of existing 230 kV overhead electrical transmission line and shield wire. The existing 15 H-frame structures will be replaced with 2-pole concrete structures on the same center line and in their current existing location, with just one 100-foot linear relocation (transmission structure number 134). Transmission Line Structures 22, 33, 41, 65, 68, and 80 are all located within Shelby County, Alabama, and Structures 97, 115, 134, 156, 214, 217, 240, 241, and 249 are all located within Talladega County, Alabama.

Since the Project will occur within an existing transmission line ROW, existing access roads will be used to construct the Project. Access to certain areas of the Project may require modifications to existing access roads (e.g., adding a surface layer of gravel/rock for heavy equipment) or the installation of new access roads due to the age of the ROW. APC determined that three new access roads would be required to facilitate the replacement of pole structures #134, #156, and #249; these new access roads will be sited in the existing and maintained ROW. APC conducted surveys of all areas of potential ground disturbance, including potential locations of access roads, work pads, and/or laydown yards. Construction is scheduled to begin on February 1, 2027, with a projected commercial operation date of December 2027. Additional descriptions 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 the area where potential ground disturbance would occur within 15 transmission pole structure replacement locations, and associated access roads, totaling approximately 3.5 acres. The Project's architectural survey area is established in accordance with Alabama Historical Commission (AHC) guidelines based on the proposed height of the new transmission structures, and includes the area within the Project LOD and the area within a 0.25-mile radius of new towers.

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: Alabama-Coushatta Tribe of Texas; Alabama-Quassarte Tribal Town; Coushatta Tribe of Louisiana; 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 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 Borrower 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 17 previous archaeological investigations within a 1-mile radius of the Project. A total of 48 previously recorded archaeological sites were identified within a 1-mile radius of the Project, all of which are outside the current APE. Seven (7) NRHP-listed historic properties are located within the 1-mile radius search area, two (2) of which are within the 0.25-mile radius APE. Lastly, seven (7) historic cemeteries are located within the 1-mile search radius, all of which are outside the APE.

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, following AHC guidelines. Photographic documentation was utilized to provide evidence of the varying environments and disposition of the survey area. A total of 85 shovel tests were excavated during the survey, none of which were recovered cultural material. Therefore, no archaeological sites were identified within the APE. Additional details on the archaeological survey methods and results are provided in Attachment 1.

Historic Architectural Resources

The historic architectural survey included photographic documentation and completion of AHC Historic Building Survey Forms for above-ground resources in the APE that met the minimum 50-year threshold for NRHP consideration. A total of nine (9) historic architectural resources were identified. The resource types recorded included residential homes and one (1) vernacular church. The residential properties documented include churches, a farmstead, multiple ranch houses, and a minimal traditional cottage. One (1) of the identified historic architectural resources is recommended as eligible for inclusion in the NRHP (Resource ID# Sh00002), and one (1) resource is recommended as having undetermined eligibility for the NRHP (Resource ID# Sh00003). The remaining seven resources are considered not eligible for the NRHP. Complete descriptions and evaluations of all surveyed historic architectural resources, maps and photographs, and AHC historic building survey forms are included in Attachment 1.

Description of the Undertaking's Effects on Historic Properties

Resource ID# Sh00002, the circa 1911 Arkwright Baptist Church, is recommended as eligible for inclusion in the NRHP. The church is located within the ARLH-listed Arkwright Heritage Area historic district, which is significant under Criterion A (history), Criterion C (architecture and engineering), and Criterion D (archaeology). The Arkwright Baptist Church is recommended individually eligible for listing to the NRHP under Criterion A (history) and Criterion C (architecture). The church is within the APE of Transmission Structure #65 and is located approximately 241 meters (790 feet) southeast of the proposed structure replacement location. A densely forested area blocks the viewshed between the church and the transmission line structure. The interceding vegetation coupled with the structure's height not increasing more than 20% and the position of the structure not changing, results in no new visual effects from the proposed Project. Therefore, the undertaking will have no adverse effect on this historic property.

Resource ID# Sh00003, a circa 1920 farmstead, is undetermined for the NRHP. The resource is located within the boundaries of the Arkwright Heritage Area, an ARLH-listed historic district under Criterion A (history), Criterion C (architecture and engineering), and Criterion D (archaeology); however, this farmstead is not listed as a contributing resource to the district. Sh00003 has multiple structures on its parcel, which include two dwellings

and at least three outbuildings. There was insufficient access to the parcel to fully document the primary pyramidal cottage dwelling associated with Sh00003, and therefore, the resource is recommended as undetermined for the NRHP. The dwelling is within the APE of Transmission Structure #65 and is located approximately 130 meters (426 feet) southeast of the proposed structure replacement location. A prominent tree line and other foliage on the parcel blocks the viewshed between the dwelling and the transmission line structure. The interceding vegetation coupled with the structure's height not increasing more than 20% and the position of the structure not changing, results in no new visual effects from the proposed Project. Therefore, the undertaking will have no adverse effect on this historic property. Please see Attachment 1 for additional information.

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 Alabama 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**.

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: 2026.11.17 11:18:43 -05'00'

Donald Brown
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:
Attachment 1. OAR Cultural Resources Report
Attachment 2. AHC Project Review and Consultation Form