



Department of Energy

Washington, DC 20585

April 30, 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, Flomaton to Perdido Underground Fiber Optic Line Project, Escambia County, 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 Flomaton to Perdido Underground Fiber Optic Line Project (the Project), located in Escambia County, 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), and the efforts to identify 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 underground installation of approximately 18.5-miles of fiber optic cable within existing APC transmission line right-of-way (ROW) between the APC Flomaton Transmission Substation in the city of Flomaton, Alabama to the APC Perdido Transmission Substation in the city of Perdido, Alabama. The Project will consist of installing fiber optic cables within the ROW corridor primarily via open cut trenching techniques, which involves the excavation of 4-foot-wide trenches at approximately 150-foot to 600-foot intervals prior to cable installation. The

trenches will be backfilled with previously excavated material following the fiber installation. If traditional trenching techniques are unattainable due to topography or waterbodies, horizontal directional drilling (HDD) may be utilized. Fiber optic cables will be laid at a depth of approximately four feet and connected to substations via splicing or pulling stations, accessible by handholes. Up to 48 new handholes will be installed along the Project route; these include rectangular plastic/resin boxes that measure five feet in length by three feet in width by three feet in height (5' x 3' x 3') that will be buried three (3) feet deep.

Construction laydown areas for the proposed Project, if necessary, will be located within the existing ROW. No additional infrastructure (e.g., new access roads or off-site parking areas) is expected to be required for the Project. Vegetation removal or ground disturbance outside of the Project corridor will not occur during construction. Six-foot-tall ROW monuments will be added to prevent future damage to the fiber optic cable.

The proposed Project ROW corridor between the Flomaton and Perdido substations traverses woodlands, wetlands, riverine and stream crossings, agricultural tracts, and the southern suburban-agricultural section of the Atmore township. The area surrounding the proposed Project ROW mainly consists of forested lands and agricultural land. 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 length and width of the linear ROW corridor (approximately 18.5 miles long by four feet wide), and the specific locations of the 48 handholes that will be placed along the linear route of the Project. The archaeological survey area includes approximately nine (9) acres.

Because the Project primarily involves installation of subsurface infrastructure (fiber optic line and handholes), the architectural survey area coincides with the linear ROW corridor, which is collocated with an existing maintained 200 feet wide overhead transmission line corridor. The proposed six-foot-tall ROW monuments that will be installed after

construction will not impose a substantial visual profile that would result in visual effects at any significant distance from the Project, and thus the APE does not include a viewshed buffer area extending beyond the boundary of the existing ROW.

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 eight (8) 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; Poarch Band of Creek Indians; 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.

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 3 and summarized below.

OAR conducted a search of the Alabama Cultural Resources Online Database, Alabama State Site File (ASSF), Alabama Register of Landmarks and Heritage (ARLH), National Register of Historic Places (NRHP), and the Alabama Historical Commission (AHC) architectural survey files 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 11 previous surveys within a 1-mile radius of the Project, two (2) of which overlap portions of the current Project's APE. A total of three (3) previously recorded archaeological sites were identified within a 1-mile radius of the Project, none of which are within the current Project's APE. Twenty-one (21) previously recorded historic structure resources fall within the 1-mile radius search area, none of which are within the current Project's APE. No NRHP-listed or ARLH-listed historic properties within the 1-mile search radius. No other potentially historic-aged resources are depicted in the Project APE on historic maps. Lastly, five (5) historic cemeteries are within the 1-mile search radius, none of which are within the Project's 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

OAR completed a Phase I cultural resources survey to identify newly recorded archaeological sites and aboveground historic resources within the APE. Field investigations consisted of a pedestrian walkover of the proposed Project area employing visual inspection of the ground surface and subsurface testing. A total of 369 shovel tests were excavated, including one each at 45 of the 48 designated handhole locations. No shovel testing was utilized at the location of Handhole 34 because it is situated in a wetland area with muck-like soils at the surface. Also, no shovel tests were excavated at HHs 47 and 48 as they lie on the concrete/gravel-covered grounds of the Flomaton Substation. Photographic documentation was undertaken to provide evidence of the varying environments and disposition of the proposed project area.

As a result of the field investigations, one newly recorded archaeological site was identified, Site 1Es261. Shovel testing at the location did not identify intact subsurface strata. The site lacks significant historical associations and information potential. Therefore, this site is recommended as not eligible for listing in the NRHP. Additional details and an ASSF form are included in Attachment 1.

Historic Architectural Resources

Pre-field background research did not identify any potential historic-aged architectural resources that meet the minimum age threshold for NRHP eligibility consideration. No new aboveground historic resources were identified in the APE during the field survey.

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 Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1). As part of the Section 106 process, DOE EDF 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 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 240-687-7266 or via email at EDF_Environmental@doe.gov.

Sincerely,

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

Attachments:

Attachment 1. OAR Cultural Resources Report

Attachment 2. AHC Project Review and Consultation Form