



Department of Energy

Washington, DC 20585

April 10, 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, Leeds Distribution Tie-In Line Improvements Project, Jefferson 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 Leeds Distribution Tie-In Line Improvements Project (the Project), located in Jefferson 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 upgrading approximately 1.03 miles of conductor, replacement of a minimum of eight (8) of the total 29 existing distribution structures, and the potential addition of two (2) new distribution structures along an approximately 1.03-mile-long section of the existing 7.2 kilovolt (kV) Leeds feeder distribution tie lines. The project touches 29 existing 40/5 and 45/ 5 wooden distribution structures and will have two (2) new structure locations and slight re-alignment of electrical

line. Eight (8) existing poles will be replaced with 50/5 poles, not increasing in height more than 10 feet, and not exceeding an overall height of 100 feet.

The maintained Right-of-way (ROW) width is 30 feet, and the Project encompasses approximately 4.86 acres of public roadside and utility ROW through residential areas located on the western outskirts of the city of Leeds in Jefferson County, Alabama. The proposed project originates at reclosing device V8466 across the street from the intersection of Highway 119 (Montevallo Rd.) and Helen St. SW in Leeds, AL, runs northeast for approximately 0.19 miles and then turns west on US Highway 78 and continues until the XT3750 normal open.

Construction activities are expected to be minor and will involve limited ground disturbance. Construction activities including installation or replacement of wooden poles using various light duty trucks (i.e., bucket trucks, derrick trucks, crew pickups, wire pulling trailers, pole trailers, material trailers, side by sides) will result in minimal ground disturbance at specific discrete locations along the existing ROW. Vegetation removal or ground disturbance outside of the ROW will not occur. No additional laydown yards or new access roads are anticipated to be necessary for the Project.

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 the entire linear route of the approximately 4.86-acre Project ROW. Due to the current and proposed overall Project height not exceeding 100 feet, the Project’s architectural survey area includes the area within a 1000-foot radius of the eight (8) monopole structures to be replaced as part 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: 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 deemed necessary.

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 ten (10) previous surveys within a 1-mile radius of the Project, two of which overlap portions of the current APE. Four (4) previously recorded archaeological sites were identified within a 1-mile radius of the Project, none of which are within the APE. One NRHP-listed historic property is located within the 1-mile-radius study area, the Jonathan W. Bass House, a ca. 1863 Raised Cottage farmhouse listed under Criterion C in the area of architecture. While this property is located approximately 262 feet east of the Project ROW, it is not within the 1000-foot viewshed radius of any of the proposed distribution structure replacements, and therefore is not within the Project's APE. Lastly, one (1) cemetery is located within the 1-mile search radius, but is not within the APE 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. Shovel testing was utilized along the entire route at each proposed transmission structure replacement location as well as between the structure locations. Photographic documentation was completed to provide evidence of the varying environments and disposition of the survey area. A total of 52 shovel tests were excavated during the survey, none of which recovered cultural material. No surface features, artifact scatters, or other surface expressions of archaeological resources were observed during the survey. Therefore, no archaeological resources were identified during the field survey. Additional details on the archaeological survey methods and results are provided in Attachment 1.

Historic Architectural Resources

Pre-field background research identifies a total of 66 potential historic-aged architectural resources that were assessed by OAR's architectural historian. Of the 66 potential historic standing structures that were investigated, five (5) were found to be no longer extant, one (1) was not historic in age, and 52 structures were grouped into a single historic district (Je00001). When multiple standing structures fell on the same parcel boundary, the structures were combined into a single resource. The remaining seven structures met the minimum 50-year threshold for NRHP consideration and were recorded as historic architectural resources (HARs).

The architectural reconnaissance survey included photographic documentation and evaluation of the identified HARs, and completion of AHC Historic Building Survey Forms. The HAR types recorded included one mid-twentieth century historic district (Je00001, ca. 1960-1964), an apartment complex (Je00002, ca. 1976), two commercial buildings (Je00003, ca. 1972; and Je00004, ca. 1972), a municipal office (Je00005, ca. 1970), a recreational park (Je00006, ca. 1960), and two dwellings (Je00007, ca. 1969; and Je00008, ca. 1969). The eight (8) newly recorded were evaluated for historical significance and integrity, and none of the structures are recommended as eligible for the NRHP due to lack of integrity and/or significance. Additional information, detailed resource descriptions, and AHC survey forms are included in Attachment 1.

In summary, no archaeological sites were identified, and no NRHP-listed or eligible historic architectural resources were identified within the APE. Therefore, no historic properties are present within the APE for this Project.

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