



Department of Energy

Washington, DC 20585

March 24, 2026

Lisa D. Jones
Executive Director and State Historic Preservation Officer
468 South Perry Street
P.O. Box 300900
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SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Alabama Power Company, Roanoke Distribution Tie-In Line Improvements Project, Randolph 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 Roanoke Distribution Tie-In Line Improvements Project (the Project), located in Randolph 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 replacement of up to 46 existing distribution structures and the addition of up to nine (9) new distribution structures along an approximately 2.8-mile-long section of existing distribution line right-of-way (ROW). The maintained ROW width is 30 feet, and the Project encompasses approximately 12.3 acres.

The Project's southern terminus is located at the intersection of Louina Road and Randolph County Road (CR) 887, situated approximately 3.7 km (2.3 mi.) southwest of the town of Roanoke, Alabama. The ROW extends northwest following CR 887 until it reaches Alabama Highway 22. At this intersection, a short 0.3-kilometer (0.18-mile) segment of ROW extends to the southwest, and the primary ROW extends northeast along Highway 22 for approximately 1.5 miles to the intersection with CR 73. The Project's northern terminus is located on the northwest side of Highway 22, just west of the intersection with CR 73.

Distribution structure replacements are not expected to increase the Project's height more than 15 feet from existing conditions. Existing structures include four (4) 35-foot-tall poles; twenty-six (26) 40-foot-tall poles; eleven (11) 45-foot-tall poles; three (3) 50-foot-tall poles; and two (2) 55-foot-tall poles.

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., Distribution 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 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 approximately 12.3-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 the Project ROW and the area within a 1000-foot 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: 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 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 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 one (1) previous survey within a 1-mile radius of the Project. No previously recorded archaeological sites have been recorded within a 1-mile radius of the Project. No ARLH- or NRHP-listed historic properties are located within the 1-mile-radius study area. Lastly, two (2) cemeteries are located within the 1-mile search radius, neither of which are 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 distribution structure replacement location as well as between the structure locations. Areas of excessive slope and inundated locations were not shovel tested; photographic documentation was completed to provide evidence of the varying environments and disposition of the survey area. A total of 78 shovel tests were excavated during the survey, none of which recovered cultural material. No surface features were observed during the survey. Therefore, no archaeological resources were identified as a result of the field survey.

Additional details on the archaeological survey methods and results are provided 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. However, the Project crosses a historic-era railway line on the south side of High Pine Creek as the ROW approaches the intersection of CR 887 and Highway 22. This resource was photo-documented and evaluated for NRHP eligibility. The Atlanta-Birmingham-Atlantic Rail Line, an early twentieth century rail line (ca. 1905) now owned by CSX Transportation, is important to commerce in the local community and region. The overall NRHP eligibility status for the resource remains undetermined due to portions of the resource outside of the Project APE remaining unassessed. However, the segment of the rail line within the Project APE represents an overly common resource type with no distinguishing characteristics such as unusually decorative crossings, elaborate drainage structures, or historic railroad features such as water tanks or loading platforms; furthermore, the segment of the railway within the APE does not exhibit significance related to historic events, persons, design features, or research potential to be considered under the NRHP Criteria. Therefore, the portion of this resource within the APE is not considered to be eligible for inclusion in the NRHP, and thus, no historic properties are present in the APE.

Additional information and a detailed resource description are included in Attachment 1.

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 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