



Department of Energy

Washington, DC 20585

August 5, 2026

Lisa D. Jones
Executive Director and State Historic Preservation Officer
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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, South Bessemer–Lock Five 500kV Transmission Line Project, Bibb, Hale, and Perry 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 South Bessemer–Lock Five 500 kilovolt (kV) Transmission Line Project (the Project), located in Bibb, Hale, and Perry counties, Alabama, for potential inclusion in the loan guarantee.

APC plans to construct the Project in two phases (hereinafter, the Phase 1 Project and Phase 2 Project), and thus the siting, design, and environmental planning will be conducted in phases. In accordance with 36 CFR 800.4(b)(2), DOE EDF proposes conducting a phased review of the undertaking, in which the identification of historic properties and consultation on DOE EDF's determinations and findings for the two Project phases would be completed sequentially. If APC's construction schedule necessitates it (e.g., if the Phase 1 Project is scheduled to begin construction prior to completing consultations on the Phase 2 Project), DOE EDF will consult to develop a Memorandum of Agreement (MOA) to address commitments to phased identification, review, and consultation. In a meeting on July 30, 2026, representatives of the Alabama Historical Commission (AHC) agreed that this approach is appropriate for the undertaking.

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 Phase 1

Project's effects on historic properties; and seeks your concurrence with DOE's Finding of No Adverse Effect for the Phase 1 Project.

Cultural resource reports for the Phase 1 Project are included as Attachments 1 and 2. An AHC Review and Consultation Form is included as Attachment 3.

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 is a proposed new 500kV transmission line installation starting in the community of Green Pond in Bibb County, Alabama and proceeding in a southwesterly direction across Bibb, Perry, and Hale Counties to the community of Lock Five in Hale County, Alabama. The total length of the Project will be approximately 63 miles starting at the existing South Bessemer Transmission Substation (TS) in Bibb County and ending at the proposed Lock Five TS in Hale County. The Lock Five TS was previously reviewed pursuant to Section 106 under AHC# 26-0591 (SHPO concurrence received on May 26, 2026), and the expansion of the existing South Bessemer TS was reviewed under AHC# 26-0743 (SHPO concurrence received on July 20, 2026).

The Phase 1 Project ROW corridor originates in north Bibb County at the South Bessemer TS (coordinates 33.218 N, -87.065 W) and extends southwesterly for approximately 31.4 miles across Bibb County to just beyond the Perry County line where it stops in Brent, Alabama (coordinates 32.826 N, -87.262 W). The Phase 1 Project encompasses a total of approximately 810 acres; the 31.4-mile-long, 200-foot-wide right of way (ROW) includes approximately 762 acres that will be cleared of trees and vegetation, and an equipment laydown area adjacent to the ROW near the existing South Bessemer TS will include an additional 48 acres.

The Phase 1 Project involves the installation of approximately 112 transmission line structures. These structures will be predominately H-Frame configurations, with each structure consisting of two steel poles spaced approximately 38 feet apart. Based on conceptual design, the average structure height is anticipated to be approximately 155 feet, measured from ground level to the top of the pole and excluding the in-ground foundation depth. Existing access roads will be used to the extent practicable. New access roads, laydown areas, and work pads will be constructed within the delineated project boundary to the extent practicable. Additional description of the Project area and maps of the Project are provided in the cultural resource reports that are included as Attachments 1 and 2.

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 the approximately 63-mile-long and 200-foot-wide ROW corridor, as well as all off-ROW areas required for construction (e.g., equipment laydown areas). For the Phase 1 Project specifically, the archaeological survey area includes a 31.4-mile-long span of the ROW corridor, encompassing approximately 762 acres, plus an approximately 48-acre equipment laydown area, for a total of approximately 810 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 ROW and the area within a 0.25-mile radius of the 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 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 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 reports that are summarized below and included as Attachments 1 and 2.

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 Phase 1 Project. This background research identified 19 previous surveys within a 1-mile radius of the Phase 1 Project. A total of 14 previously recorded archaeological sites were identified within the 1-mile radius search area, all but one (1) of which are outside the current APE. One of the previously recorded sites in the 1-mile search radius (outside of the APE) is considered eligible for the NRHP; no other NRHP-listed or ARLH-listed or eligible historic properties are located within the 1-mile radius search area. Lastly, eight (8) historic cemeteries are located within the 1-mile search radius, including the Camp Branch Baptist Church Cemetery, which is within the APE for the equipment laydown area.

Following the completion of background research, OAR completed Phase I cultural resource surveys to identify newly recorded archaeological sites and historic architectural resources within the APE. The results of the surveys are summarized below and provided in Attachments 1 and 2.

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. The results of the ROW corridor survey are reported in Attachment 1. The results of the Phase 1 Project laydown area survey are reported in Attachment 2.

A total of 2,150 shovel tests were excavated during the ROW corridor survey. One previously recorded site was revisited (Site 1Bb270), and 10 new archaeological sites were identified (Sites 1Bb632—1Bb641). Site 1Bb270 was previously determined not eligible for the NRHP in 1993, and the current investigation does not alter that determination. Two (2) of the newly identified sites (Sites 1Bb632 and 1Bb638) are considered eligible for inclusion in the NRHP, while the remaining eight (8) sites are recommended as not eligible. Additional details on the archaeological survey methods and results, as well as site descriptions, maps, field photographs, and AHC site forms, are provided in Attachment 1.

During the laydown area survey, a total of 69 shovel tests were excavated, none of which recovered cultural material. A portion of site 1Bb637 (first identified in Attachment 1 and recommended as not eligible for the NRHP) is within this survey area, and the laydown area survey did not yield additional information that would alter that NRHP recommendation. In addition to this site, one historic cemetery (Camp Branch Baptist Church Cemetery) was identified on the southeastern side of the 48-acre laydown area. Additional details on the archaeological survey methods and results, as well as maps and field photographs, are provided in Attachment 2.

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 35 historic architectural resources properties were identified that met the minimum 50-year threshold for NRHP consideration. The resource types recorded included dwellings (multiple bungalows, ranch houses, cottages, and a manufactured home), a commercial property, two churches, a railroad bed and culvert, an education complex, and a farmstead. Two of the newly recorded historic architectural resources (Pe00001 and Bb00034) are considered eligible for inclusion in the NRHP, while the remaining 33 resources are recommended as not eligible. Complete descriptions and evaluations of all 35 surveyed historic architectural resources, maps, photographs, and AHC historic building survey forms are included in Attachment 1.

Description of the Undertaking's Effects on Historic Properties

NRHP-eligible archaeological sites 1Bb632 and 1Bb638 are within the Phase 1 Project ROW corridor. APC's siting of the transmission line structures and construction workspace will avoid physical disturbance to the eligible sites and a ROW vegetation clearing strategy to further minimize effects on the sites will be implemented (i.e., hand clearing and matting, as necessary). Therefore, the Project would have **no adverse effect** on the two NRHP-eligible archaeological sites, provided that APC's siting avoids the sites and APC minimizes potential effects by adhering to the ROW clearing strategy near the eligible sites when constructing the Project.

The historic Camp Branch Baptist Church Cemetery is located in the area surveyed for the Phase 1 Project's equipment laydown yard. APC's construction plans identify and label the cemetery, and it will also be clearly marked in the field prior to the start of construction. APC will avoid the cemetery when constructing the Project, and therefore, the Project will have **no effect** on the cemetery.

OAR recommended that the Project would have a visual adverse effect on the two NRHP-eligible historic architectural resources (Pe00001 and Bb00034). DOE EDF disagrees with this recommendation and believes the Phase 1 Project would have **no adverse effect** on these two historic properties, as described below.

Pe00001 (Ragland Farmstead)

Resource Pe00001 (Ragland Farmstead) is a nineteenth century farmstead complex that includes a farmhouse, cemetery, remnants of brick structures believed to be former slave quarters, and several outbuildings including a grist mill, a blacksmith shop, a pump house, a remnant foundation of a cotton processing building, a stock building, a corn crib, a hay barn, a foundation of a chicken house location, and a barn that is currently used as a garage. In Attachment 1, the Ragland Farmstead is recommended as NRHP eligible under Criteria

A and D. In addition, the grist mill retains its architectural integrity and is recommended as individually eligible under Criterion C.

OAR's recommendations in Attachment 1 did not consider the individual eligibility of the cemetery component. The two interments in the cemetery, husband and wife George and Christina Mayberry, do not qualify for inclusion in the NRHP under Criterion B; however, as George Mayberry was a Revolutionary War Veteran, DOE EDF also recommends the cemetery as individually eligible for the NRHP under Criteria Consideration D as a cemetery which derives its primary significance from age and from association with historic events.

Only the northernmost section of the farmstead property is within the 0.25-mile radius APE. Of the 17 structures recorded on the property, only five (5) are within the APE: the remnant block plant, the remnant brick chimney, the possible root cellar, the barn/garage, and the cemetery. The grist mill is outside of the APE and thus would not be subject to physical or non-physical effects caused by the Project; therefore, no further individual consideration of the grist mill is necessary for this consultation.

As noted in Attachment 1, the block plant structure and the brick chimney are collapsed, the barn is presently used as a garage, and the possible root cellar is structurally unconfirmed; therefore, these components of the property within the APE have substantially compromised or dubious integrity in comparison to other historic and intact structures on the farmstead located outside of the APE. Because these four structures and the cemetery are located within the APE for non-physical effects (the 0.25-mile radius), no physical disturbance or structural alterations would result from the Project, and therefore the Project would have no effect on the integrity of location, design, materials, workmanship, feeling, and association. Visual changes potentially affecting the integrity of setting for the cemetery and the farmstead as a whole would be minimal, if not avoided completely, as described below.

Of the five (5) property features within the APE, the block plant structure is closest to the Project; but it is over 500 feet from the Project and is separated from the Project by interceding forest vegetation. The remaining four (4) features are further south and thus further visually screened by interceding forest. Furthermore, all five (5) components within the APE derive their historic significance through associations with historic events not necessarily conveyed by a surrounding forested setting; rather, the agricultural setting of the property's pecan orchard and/or surrounding farmland would be considered more important in conveying the property's historically significant associations, and these areas of the property are located outside of the APE. Therefore, any potential visual changes to the forested surroundings northwest of the property resulting from the Project would be minimal, if not avoided completely through natural visual screening, and would be unrelated to the aspects of the setting that convey historically significant associations. Such minimal changes to the setting would not compromise the integrity of the historic property. Therefore, DOE EDF concludes that the Project would have **no adverse effect** on this historic property.

Bb00034 (Birmingham Minerals Division Railroad)

Resource Bb00034 is a segment of the late nineteenth-century Birmingham Minerals Division Railroad (BMRR). At the location where the Project intersects the former railroad, a raised portion of the railroad bed constructed of a combination of rock and soil was built to allow the railroad to cross a natural drainage. During the field survey, a few scattered railroad spikes and cross-ties were observed but no actual railroad track remains in place. A cut-stone culvert original to the BMRR railroad is set at the base of the built-up rail bed. The railroad culvert was recommended by OAR as potentially eligible for the NRHP under a combination of Criteria C and D: “The cut-stone architectural form reflects important design qualities related to the construction of the original Birmingham Minerals Division Railroad in the late 1800s. This railway was an integral aspect of the burgeoning development of the steel manufacturing industry in the general Birmingham, Alabama vicinity. The culvert and railroad line itself contains significant research potential related to the Birmingham steel industry, considered an integral aspect of Alabama’s dominance in the steel industry of that time period.”

DOE EDF considers the cut-stone culvert individually eligible under Criterion C as a good representative example of an underrepresented architectural style or feature related to the engineering and design of the historic railroad. DOE EDF partially disagrees with the second eligibility recommendation for the culvert: DOE EDF finds that OAR’s characterization of the BMRR’s historical significance is better suited as a recommendation *of the entire railroad* for eligibility under Criterion A for its association with the burgeoning development of the steel manufacturing industry in the Birmingham vicinity, rather than as an individual recommendation of the culvert under Criterion D. DOE EDF does not find that the culvert individually conveys such significance under Criterion A, nor individually possesses significant information potential under Criterion D. That said, no intact remnants of the railroad itself remain within the APE that convey its historical significance, aside from isolated relict features of the rail corridor (i.e., abandoned rail bed, culverts). As such, the section of the BMRR within the APE has substantially compromised integrity, and would not contribute to the overall significance of the railroad as a whole under Criterion A. Therefore, the Project would have **no adverse effect** on the BMRR.

To ensure adverse effects are avoided, APC’s siting of the transmission line structures and construction workspace in its vicinity will avoid physical disturbance to the portion of the railroad that is intersected by the Project, as well as the cut-stone culvert, and a ROW vegetation clearing strategy to further minimize effects on the railroad and culvert will be implemented (i.e., hand clearing and matting, as necessary). Therefore, the Project would have **no adverse effect** on this historic property, provided that APC’s siting avoids the sites and APC minimizes potential effects by adhering to the ROW clearing strategy near the railroad and culvert when constructing the 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 Adverse Effect,

consistent with 36 CFR § 800.5(d)(1), for the Phase 1 Project. 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.**

Because APC plans to construct the Project in two phases, DOE EDF proposes conducting a phased review for the Project in accordance with 36 CFR 800.4(b)(2), in which the identification of historic properties and consultation on DOE EDF's determinations and findings for the two Project phases would be completed sequentially. If APC's construction schedule necessitates it (e.g., if the Phase 1 Project is scheduled to begin construction prior to DOE EDF completing consultations on the Phase 2 Project), DOE EDF will develop a MOA to address commitments to phased identification, review, and consultation.

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 – Phase 1 Project ROW Corridor
Attachment 2. OAR Cultural Resources Report – Phase 1 Project Laydown Area
Attachment 3. AHC Project Review and Consultation Form