



Department of Energy

Washington, DC 20585

June 22, 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, Thurlow Dam to Notasulga 115kV Transmission Line Rebuild Project, Elmore, Tallapoosa, and Macon 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 Thurlow Dam to Notasulga 115kV Transmission Line Rebuild Project, Elmore, Tallapoosa, and Macon 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), 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 proposed action is the issuance of Federal financing to the Borrower for the undertaking (i.e., the Project), which includes rebuilding approximately 13 miles of the existing Thurlow Dam to Notasulga 115kV Transmission Line within a 100-foot-wide Right-of-way (ROW). The Project originates in Elmore County near the Thurlow Dam hydroelectric generating plant and heads southeast for approximately 1 mile, crossing the

Tallapoosa River before heading east for approximately 13 miles and terminating at the Notasulga Transmission Substation in Macon County.

The Project involves the installation of 92 replacement transmission structures, five (5) intermediate structure installations to be set between the main span transmission structures, and the construction of 13 miles of 115kV overhead electric transmission line. APC proposes to shift the centerline of the existing transmission line approximately 30 feet north within the existing ROW. As a result, APC will be required to clear 50 feet of trees and vegetation along the north side of the existing 13-mile-long ROW (approximately 72 acres) to re-establish the ROW corridor. APC will clear vegetation to expand the ROW 50 feet to the north, install the new transmission structures along the north edge of the existing ROW in the newly cleared area, and then the original transmission structures will be removed.

Since the Project will occur within an existing transmission line ROW, existing access roads will be used to construct, operate, and maintain the Project when possible. Access to certain areas of the Project may require modifications to existing access roads or the installation of new access roads due to the age of the ROW. APC conducted surveys of all areas of potential ground disturbance, including potential locations of access roads, work pads, and/or laydown yards. 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 area where potential ground disturbance would occur within the 100-foot-wide ROW corridor, including the area where trees and vegetation would be cleared to expand the ROW 50 feet to the north, totaling approximately 87.2 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. This includes the area within the Project LOD and the area within a 1000-foot radius of new towers that would increase in height by more than twenty percent over the existing height but are to be less than 100 feet in total height.

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; Cherokee Nation; Coushatta Tribe of Louisiana; Eastern Shawnee Tribe of Oklahoma; 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 18 previous surveys and one (1) archaeological testing investigation within a 1-mile radius of the Project. Four (4) of the previous surveys partially overlap the current APE. A total of 27 previously recorded archaeological sites were identified within a 1-mile radius of the Project, all of which are outside the current APE. Three (3) NRHP-listed historic properties are located within the 1-mile radius search area, none of which are within the APE. The NRHP-listed Tallassee Commercial Historic District and the Tallassee Mill are located approximately 0.6 mile north of the Project's western terminus in the city of Tallassee, and the NRHP-listed Shiloh Baptist Church Cemetery is located approximately 0.6 mile north of the Project's eastern terminus, both of which are outside the 1000-foot radius APE. Lastly, two (2) historic cemeteries are located within the 1-mile search radius, including the aforementioned Shiloh Missionary Baptist Church Cemetery and the Wall Street Church Cemetery, also known as Wall Street AME Zion Baptist Church Cemetery, which is also located approximately 0.6 mile north of the Project and 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 476 shovel tests were excavated during the survey, none of which were recovered cultural material. Two surficial isolated finds were recorded during the survey; isolated finds generally do not possess significant information potential or depositional integrity and are considered not eligible for the NRHP. Therefore, no archaeological sites eligible for listing in the NRHP 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 17 historic architectural resources were identified. The resource types recorded included residential homes and one (1) vernacular church. The residential properties documented were two pyramidal cottages, a t-cottage, multiple ranch houses, and a home with ranch and bungalow features. None of the identified historic architectural resources within the APE are recommended as eligible for inclusion in the NRHP. Therefore, no historic properties were identified within the APE. Complete descriptions and evaluations of all 17 surveyed historic architectural resources, maps and photographs, and AHC historic building survey forms are included in Attachment 1.

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