



Department of Energy

Washington, DC 20585

October 9, 2026

Diana Welling
State Historic Preservation Officer
Ohio History Connection
800 E. 17th Avenue
Columbus, OH 43211

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, American Electric Power, East Leipsic to Rader Road 138kV Transmission Line Rebuild Project, Hancock and Putnam Counties, Ohio

OHC Reference No.: 2022-HAN-54538

Dear Ms. Welling,

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has executed a Federal loan guarantee agreement with American Electric Power (AEP or Borrower) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to AEP 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. AEP has identified the East Leipsic to Rader Road 138 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Hancock and Putnam Counties, Ohio, for potential inclusion in the loan guarantee.

The purpose of this letter is to document consultation with the Ohio 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. An Ohio SHPO Project Summary Form is included as Attachment 1.

Previous SHPO Review

AEP previously submitted the Project to the Ohio SHPO as part of their environmental due diligence review and per the requirements of the Ohio Power Siting Board and Ohio state regulations. In response, the Ohio SHPO provided comments to AEP pursuant to NHPA Section 106 and agreed with the determination of effect and concluded that no further coordination is required, unless the project changes or additional resources are discovered during the implementation of the Project (SHPO ID# 2022-HAN-54538). Now, the Project

is before DOE EDF for consideration of a Federal loan guarantee. DOE EDF has reviewed all the Project materials and the SHPO consultation record, and has confirmed that the Project has not changed and is consistent with the area previously surveyed and reported in the documents and correspondence on file with Ohio SHPO. As such, DOE EDF's finding of effect is consistent with the SHPO review already completed (SHPO ID# 2022-HAN-54538).

DOE EDF concurs with SHPO's previous Section 106 findings and DOE EDF is not seeking for the SHPO to repeat its review but is seeking *concurrence* from SHPO on the previously stated finding. DOE EDF is providing the below descriptions only to inform the public in accordance with 36 CFR § 800.2(d) and to meet the documentation standards per 36 CFR § 800.11.

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 involves rebuilding of an existing 69kV transmission line and upgrading it to a 138kV transmission line between the East Leipsic and Rader Road Substations. In total, the Project encompasses approximately 9.6 miles of transmission facilities, including approximately 5.0 miles of reconstructed and rerouted transmission line and approximately 4.6 miles of existing transmission line that will remain in service as part of the upgraded 138-kV transmission system. The Project will also expand the overall width of the existing right-of-way (ROW) from 50 feet to 80 feet to meet electrical clearance requirements. A total of 199 existing structures will be removed and replaced with 92 structures. Existing facilities within the ROW, generally consisting of 50- to 65-foot-tall wood poles, will be removed and replaced with new 80- to 120-foot-tall structures, including H-frame structures or galvanized steel poles, to include new overhead conductors and shield wire.

AEP will employ temporary gravel and timber-matted pull pads and work pads that vary in width and length, where necessary, to install the transmission structures and conductors. Access roads and work pads will be placed within the ROW, or immediately adjacent to the ROW, for use during construction. Access roads will consist of temporary gravel or timber matting placed on top of the ground at a width of 20 feet. Construction activities consistent with transmission lines typically include erosion and sediment control, temporary access roads, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, and restoration once construction is completed. Approximately 2.3 acres of tree clearing will be conducted during the applicable United States Fish and Wildlife Service (USFWS) tree clearing window and in accordance with any other relevant environmental requirements.

The following ROW deviations from the existing transmission line centerline are required for the Project:

1. 2.0 miles of deviation between the existing East Leipsic Substation and proposed Structure 20 to eliminate a circuitous segment of the existing Yellow Creek – East Leipsic and Leipsic - McComb transmission lines;
2. 0.1 mile of deviation between proposed Structures 21 and 22 to remove two heavy angle
3. structures and increase distance to a building on the south side of Road E;
4. 0.1 mile of deviation between proposed Structures 44 and 45 to reduce the angle of the line as it crosses County Road 16;
5. 0.1 mile of deviation between proposed Structures 49 and 50 to connect the line with a switch replacement on the south side of Township Road 103;
6. 0.3 mile of deviation between proposed Structures 50 and 54 to increase distance to a building on the south side of Township Road 103 and to reduce tree clearing impacts near Beaver Creek;
7. 0.1 mile of deviation between proposed Structures 63 and 64 to reduce the number of angle structures;
8. 0.3 mile of deviation between proposed Structures 81 and 84 to move the line to the east side of Township Road 123 in order to increase distance to a building on the west side of Township Road 123; and,
9. 0.1 mile of deviation between proposed Structure 91 and the proposed Rader Road Substation to accommodate a greenfield approach into the new facility.

As mentioned above, the Project under review by DOE EDF, as proposed, is consistent with the area previously surveyed and reported to the Ohio SHPO under SHPO ID# 2022-HAN-54538. DOE EDF has reviewed all the Project materials and the SHPO consultation record, and DOE EDF has confirmed the Project has not changed and is consistent with the consultation already conducted.

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 expanded ROW corridor (approximately 93.4 acres) and proposed temporary access roads and construction workspace extending outside the ROW (approximately 11 acres), totaling approximately 104.4 acres. The Project's architectural survey area includes the area within the ROW plus 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 nine (9) federally recognized Tribes to see if they have an interest in the Project: Eastern Shawnee Tribe of Oklahoma; Hannahville Indian Community, Michigan; Little Traverse Bay Bands of Odawa Indians, Michigan; Match-e-be-nash-she-wish Band of Pottawatomis Indians of Michigan; Miami Tribe of Oklahoma; Ottawa Tribe of Oklahoma; Seneca-Cayuga Nation; Shawnee Tribe; and Wyandotte Nation.

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 Applicant contracted Weller & Associates, Inc. (Weller) to conduct cultural resource surveys. The results of Weller's investigations are summarized below.

Weller conducted a search of various archival sources, the Ohio SHPO inventory database, and the National Register of Historic Places (NRHP) to identify previously conducted surveys and previously recorded cultural resources and historic properties within the APE (i.e., a 1000-foot radius surrounding the Project). This background research identified two (2) previous cultural resource surveys conducted in the study area, one of which partially overlaps the current Project. One (1) previously recorded archaeological site was identified in the study area, but outside of the Project ROW. No previously recorded Ohio Historic Inventory (OHI) resources, NRHP-listed historic properties, prior SHPO determinations of eligibility, nor historic cemeteries are located within the study area.

Following the completion of background research, Weller completed Phase I cultural resources surveys to identify newly recorded archaeological sites and historic architectural resources within the APE. Weller prepared the initial cultural resources reports (separate archaeology and history/architecture reports), as well as three addenda, and submitted them to the Ohio SHPO for advance review as part of AEP's environmental due diligence review (SHPO ID# 2022-HAN-54538). The results of these investigations are 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 SHPO guidelines. Photographic documentation was utilized to provide evidence of the varying environments and disposition of the survey area. Visual inspection was conducted in areas of steep slope, inundation, and/or prior disturbance to verify the conditions and suitability for testing. Pedestrian transects were spaced at 5- to 7.5-meter intervals throughout the Project corridor when the bare ground surface visibility was 50 percent or greater. Subsurface shovel testing was conducted in the areas where the conditions were suitable. During the initial survey, a total of 29 shovel test units were excavated. All of the sites identified during the field investigations were identified during surface collection survey; there were no deeply buried or discrete cultural deposits or stratigraphic levels identified through shovel testing. Additional details on the archaeological survey methods and results, maps, and photographs are included in the archaeological survey report on file with SHPO (SHPO ID# 2022-HAN-54538).

The survey identified six (6) new archaeological sites in the APE of the current Project (33PU0235-0236, and 33HK1038-1041). All six sites are considered not eligible for the NRHP due to limited artifact assemblages, lack of temporally diagnostic cultural materials or features, and lack of depositional integrity. Ohio SHPO concurred with the recommendations in Weller's technical report in a letter dated May 6, 2022 (SHPO ID# 2022-HAN-54538).

After the initial Phase I survey, additional archaeological survey work was conducted to address proposed additional areas of disturbance, workspace, and access roads that were not within the original surveyed area. An additional 81 shovel test pits and 42 shovel probes were excavated during the addendum surveys, along with additional pedestrian reconnaissance transects where ground surface visibility allowed. No additional archaeological resources were identified within the APE as a result of the three addendum surveys. Two addendum surveys overlapped and re-investigated site 33HK1041; however, no additional significant deposits were identified, and the NRHP status of the site remains not eligible. Ohio SHPO concurred with the recommendations in Weller's addendum reports in a letter dated February 14, 2025, May 13, 2025, and June 1, 2026 (SHPO ID# 2022-HAN-54538).

Historic Architectural Resources

The historic architectural survey included photographic documentation of above-ground resources in the APE that met the minimum 50-year threshold for NRHP consideration. The architectural survey identified a total of 41 resources 50 years of age in the APE. Building types and styles are consistent with patterns of settlement in the area and most of the resources are vernacular exhibiting no academic style. The resources are primarily single-family residences and barns dating from the late-19th century to 1972. Outbuildings, sheds, and other dependencies were not included in the field survey results unless they exhibited potential for listing in the NRHP. Additional details, maps, and photographs are included the architectural survey report on file with SHPO (SHPO ID# 2022-HAN-54538).

None of the 41 resources in the APE were found to be eligible for the NRHP. None are associated with significant events, patterns of events, or individuals in a manner necessary for inclusion in the NRHP under Criteria A or B. The buildings are typical of others in the area and throughout Ohio, are not the works of a master, and do not exhibit distinctive character-defining features; therefore, the resources are not eligible for inclusion in the NRHP under Criterion C. None of the resources exhibit significant research potential qualify for eligibility under NRHP Criterion D. Ohio SHPO concurred with the recommendations in Weller's technical report in a letter dated May 6, 2022 (SHPO ID# 2022-HAN-54538).

The addendum surveys did not record any additional historic architectural resources. Therefore, no historic properties were identified in the APE. Ohio SHPO concurred with the recommendations in Weller's addendum reports in a letter dated February 14, 2025, May 13, 2025, and June 1, 2026 (SHPO ID# 2022-HAN-54538).

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). EDF is not seeking for the SHPO to repeat its previously completed review of this Project (SHPO ID# 2022-HAN-54538). As part of the Section 106 process, DOE EDF requests the concurrence of the Ohio SHPO on the Finding of No Historic Properties Affected on the Project **within thirty (30) days of receipt of this letter**. In accordance with 36 CFR § 800.3(c)(4), DOE EDF will proceed if no response is received within 30 days, recognizing that SHPO has already reviewed and commented on this Project.

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 David Johnson via email at david.johnson3@hq.doe.gov or EDF_Environmental@doe.gov.

Sincerely,

KARA HARRIS

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Kara Harris
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. Ohio SHPO Project Summary Form