



Department of Energy

Washington, DC 20585

August 6, 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, Fort Steuben-Hammondsville 69kV Transmission Line Rebuild Project, Jefferson County, Ohio

OHC Reference No.: 2026-JEF-68455

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 Fort Steuben-Hammondsville 69 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Jefferson County, Ohio, for potential inclusion in the loan guarantee.

The purpose of this letter is to formally initiate 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. A cultural resources report is included as Attachment 1, and an Ohio SHPO Project Summary Form is included as Attachment 2.

The Borrower previously submitted the Project to the Ohio SHPO as part of their due diligence review before a Federal Section 106 review nexus was identified and prior to the involvement of DOE EDF as lead federal agency (OHC Reference No.: 2026-JEF-68455). The Ohio SHPO previously reviewed and agreed with the conclusions of the cultural resources report in a letter dated June 18, 2026 (Attachment 3). DOE EDF finds that the survey effort to identify historic properties demonstrated in the report is sufficient to meet the requirements of Section 106.

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 0.2 mile of the existing Fort Steuben-Hammondsville 69kV transmission line in the location it exists today, and expanding the existing 70-foot-wide right-of-way (ROW) to a proposed new width of 80 feet to satisfy modern voltage standards. A total of four (4) 25 to 85-foot-tall existing transmission structures (two steel lattice structures and two wood pole structures) will be removed, and two (2) new approximately 80-foot-tall galvanized steel poles will be installed, as well as overhead conductors and shield wire. Access roads and work pads will be placed within the ROW, or immediately adjacent to the ROW, for use during construction.

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. Project maps are provided in the cultural resources 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 LOD, or the area where potential ground disturbance would occur within the ROW corridor and proposed access roads and temporary construction workspace, totaling approximately 7.65 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 six (6) federally recognized Tribes to see if they have an interest in the Project: Delaware Nation, Oklahoma; Eastern Shawnee Tribe of Oklahoma; Miami Tribe of Oklahoma; The Osage Nation; Seneca Nation of Indians; and Seneca-Cayuga 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. Weller prepared the cultural resources report that is included as Attachment 1 and 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 a 1,000-foot radius of the Project. This background research did not identify any previous cultural resource surveys or previously recorded archaeological sites, historic resources, NRHP-listed historic properties, cemeteries, or potentially historic structures within the APE. Following the completion of background research, Weller 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 SHPO guidelines. Photographic documentation was utilized to provide evidence of the varying environments and disposition of the survey area, the majority of which consists of steeply sloping terrain and disturbed conditions related to mining activity. A total of 11.1 acres were surveyed, within which the 7.65-acre LOD is located. The additional surveyed acreage results from Weller's use of a broader 100-foot-wide survey corridor that encompasses the proposed 80-foot-wide ROW, 50-foot-wide survey corridors encompassing the proposed 25-foot-wide access roads, and broader areas within which additional workspace (i.e., pull pads) are located. A total of 67 subsurface shovel probes were excavated during the survey, none of which were recovered cultural material. Therefore, no archaeological sites 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 of above-ground resources in the APE that met the minimum 50-year threshold for NRHP consideration. A total of seven (7) historic architectural resources were identified. The resource types recorded included residential homes dating from circa 1900 to 1950 of vernacular, Craftsman, and Mid-Century Modern styles. None of the identified historic architectural resources within the APE are recommended as eligible for inclusion in the NRHP. Therefore, DOE EDF has determined no historic properties were identified within the APE. Additional details, maps, and photographs 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 Ohio 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. Cultural Resources Report

Attachment 2. Ohio SHPO Project Summary Form

Attachment 3. Previous SHPO Correspondence (re: 2026-JEF-68455)