



Department of Energy

Washington, DC 20585

October 21, 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, Grace-South Rokeby 69kV Transmission Line Rebuild Project, Morgan County, Ohio

OHC Reference No.: 2023-MRG-58587

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 Grace-South Rokeby 69 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Morgan County, Ohio, for potential inclusion in the loan guarantee.

The purpose of this letter is to continue 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. DOE EDF previously consulted the SHPO in a letter dated August 7, 2026, and the SHPO provided its concurrence with the Finding of No Adverse Effect in a letter dated September 1, 2026 (SHPO ID# 2023-MRG-58587). This letter describes a minor change in Project scope and provides an addendum survey report (Attachment 1). DOE EDF maintains its prior Finding of No Adverse Effect for this Project and requests your expedited concurrence.

Description of the Undertaking and Area of Potential Effects

DOE's proposed action is the issuance of Federal financing to the Borrower for the undertaking (i.e., the Project), which includes rebuilding approximately 12.3 miles of existing linear transmission infrastructure. Following the prior review of the Project, additional addendum field investigations were conducted to address the realignment of two (2) access roads that include areas outside the prior survey coverage (see Attachment 1).

The area of potential effects (APE) for the realigned access road sections consists of 30-foot-wide survey corridors spanning the area between previous survey coverage.

Description of Efforts to Identify Historic Properties

Attachment 1 provides the results of the addendum field survey for the two Project access road realignments.

The literature review was updated to address the new survey area, and no previously recorded archaeological sites or historic architectural resources were identified within the APE.

The archaeological field investigations consisted of pedestrian walkover of the survey area employing visual inspection of the ground surface and subsurface testing where conditions allowed, following SHPO guidelines. Visual inspection was completed to document field conditions and determine if shovel testing would be viable. There were situations where the subsurface testing was precluded by prior disturbance associated with grading, an extant residential driveway, and steep slope terrain. There were 13 shovel test units excavated in manicured lawn and fallow field conditions during the investigations. There were no archaeological deposits identified through shovel testing, and no archaeological resources identified during the survey.

There were no historic architectural resources identified during the survey.

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; Delaware Tribe of Indians; Eastern Shawnee Tribe of Oklahoma; Miami Tribe of Oklahoma; The Osage Nation; and Seneca-Cayuga Nation.

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 maintaining the prior Finding of No Adverse Effect, consistent with 36 CFR § 800.5(d)(1), as issued in the previous consultation letter for this Project.

Due to the limited scope of the addendum survey and the consistency of the Finding with previous consultation, DOE EDF requests the expedited concurrence of the Ohio SHPO on the Finding of No Adverse Effect **within fifteen (15) days of receipt of this letter**.

If you have any questions or would like to discuss this project further, please contact me via email at EDF_Environmental@doe.gov.

Sincerely,

DONALD BROWN Digitally signed by DONALD
BROWN
Date: 2026.10.21 11:01:23 -04'00'

Donald Brown
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. "Addendum 4" Survey Letter Report by Weller & Associates, Inc.