



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, 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 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), the efforts to identify historic properties, and the undertaking's effects on historic properties; and seeks your concurrence with DOE's Finding of No Adverse Effect for this Project. An Ohio SHPO Project Summary Form is included as Attachment 1.

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.: 2023-MRG-58587). The Ohio SHPO has previously reviewed and agreed with the conclusions of the initial cultural resource survey reports and three subsequent addenda. These reports are already on file with the SHPO and thus are not included in this submittal; the previous SHPO correspondence is included as Attachment 2 for reference. DOE EDF has reviewed

the survey reports and finds that the identification effort demonstrated in the reports 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 12.3 miles of existing linear transmission infrastructure generally in the location it exists today and expanding the existing 60-foot-wide right-of-way (ROW) to a new width of 100 feet to meet electrical clearance requirements for the new transmission line structures. The following short deviations from the centerline are required to avoid existing structures and to reduce angles along the centerline; despite the minor deviations, the rebuilt transmission line centerline will still be within the existing 60-foot ROW for most of its length.

1. 0.10 mile of new ROW between proposed structures 70 and 73 to avoid a barn.
2. 0.06 mile of new ROW between proposed structures 68 and 69 to reduce a heavy angle in the existing alignment.
3. 0.08 mile of new ROW between proposed structures 23 and 24 to reduce the overall number of angle structures from the existing alignment.
4. 0.26 mile of new ROW between proposed structures 11 and 13 to avoid a residence.
5. 0.12 mile of new ROW between proposed structures 7 and 9 to avoid a garage.

A total of 91 existing 65-foot-tall wood pole structures will be removed and replaced with 87 approximately 80-foot-tall H-frame structures or galvanized steel poles, as well as overhead conductors and shield wire. Four existing structures will remain in place along the transmission line. 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.

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 150.25 acres) and proposed temporary access roads and construction workspace extending outside the ROW (approximately 26.8 acres), totaling approximately 177.05 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; Delaware Tribe of Indians; Eastern Shawnee Tribe of Oklahoma; Miami Tribe of Oklahoma; The Osage Nation; 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 initial cultural resources reports (separate archaeology and history/architecture reports) as well as three addenda. The reports 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 a 1,000-foot radius of the Project. This background research identified five (5) previous cultural resource surveys conducted in the study area, two (2) of which intersect the Project APE. One (1) previously recorded archaeological site was identified in the study area but is not within the Project ROW. One (1) previously recorded historic architectural resource was identified in the study area outside of the ROW but within the 1,000-foot-radius APE. One

(1) NRHP-listed historic property, the Muskingum River Navigation Historic District, is traversed by the Project ROW corridor; this multiple resource district is centered on the alignment of the Muskingum River but there are no relative recorded resources in the vicinity of the Project. Lastly, one (1) cemetery was identified in the study area nearly 1,000 feet southeast of the Project ROW.

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. The results of the initial surveys are summarized below. Weller subsequently prepared three addenda covering additional Project areas that were not included in the initial surveys. The results of those additional investigations are also summarized below. The reports are already on file with SHPO and thus are not included with this submittal; prior SHPO correspondence is included as Attachment 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 SHPO guidelines. Photographic documentation was utilized to provide evidence of the varying environments and disposition of the survey area. The report notes that approximately 90 percent of the overall corridor involves landforms that have 15 percent or greater slope. Locations conducive for systematic shovel testing were limited to occasional terraces and flatter areas within the entrenched valleys, ridge tops, and narrow terrace situations within the river valley. Severely disturbed conditions related to transportation-related activities, underground utilities, landscaping, mining, and industrial development also inhibited subsurface shovel testing in some portions of the Project corridor. Lastly, there are small parts of the Project corridor that were the subject of previous surveys which were not resurveyed during the current effort as there were no resources identified by the prior work.

During the initial survey, a total of 330 shovel tests were excavated in the survey area and two (2) new archaeological sites were recorded (33MG0246 and 33MG0247). Both sites are considered not eligible for the NRHP due to limited artifact assemblages, lack of temporally diagnostic materials, and lack of intact defining deposits (i.e., strata, features). Additional details on the archaeological survey methods and results, maps, and photographs are provided in the archaeological survey report.

After the initial survey, additional archaeological survey work was conducted to address proposed additional areas of disturbance and access roads that were not within the original surveyed area (Addendum Reports 1, 2, and 3). There were some areas that were encountered where archaeological testing was not necessary (e.g., slope in excess of 15 percent) and the work was limited to visual inspection. A total of 485 shovel tests were excavated for the addendum investigations. No archaeological resources were identified within the APE. Additional details, maps, and photographs are provided in the addendum reports.

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 field survey identified a total of 42 new architectural resources, one (1) previously recorded resource, and one (1) NRHP-listed historic district within the APE. Building types and styles are mostly single-family residences and barns dating from the 19th century to 1971. Stylistically, the buildings are mostly vernacular (exhibiting no formal academic style) and mid-century Modern Movements. None of the newly identified historic architectural resources within the APE are recommended as eligible for inclusion in the NRHP. Previously recorded Ohio Historic Inventory (OHI) resource MRG0005711 is also considered not eligible for the NRHP. The NRHP-listed Muskingum River Navigation Historic District is within the APE, and an assessment of effects is summarized below and included in the history/architecture survey report. The addendum surveys did not involve any additional architectural resources that were not previously addressed. Additional details, maps, and photographs are included in the history/architecture survey report, which is already on file with SHPO and is not included with this submittal; prior SHPO correspondence is included as Attachment 2.

Description of the Undertaking's Effects on Historic Properties

The Muskingum River Navigation Historic District (07000025) is listed in the NRHP under Criterion A and C. Because the Project involves the proposed replacement of transmission structures along the ROW of an existing transmission line, the Project will not constitute a new or novel visual intrusion to the setting and the viewshed of this historic property will not be significantly altered by the Project. No harmful visual, atmospheric, or audible elements will be introduced in a manner that would disqualify the district from being eligible for listing in the NRHP; therefore, the Project would have **no adverse effect** on this historic property.

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). As part of the Section 106 process, DOE EDF requests the concurrence of the Ohio 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**.

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. Ohio SHPO Project Summary Form

Attachment 2. Previous SHPO correspondence (re: 2023-MRG-58587)