



Department of Energy

Washington, DC 20585

September 30, 2026

Joseph Bell
Executive Director and State Historic Preservation Officer
Texas Historical Commission
P.O. Box 12276
Austin, Texas 78711

cc:

Donna Hutchins, San Patricio County Historical Commission

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, American Electric Power, Hecker to Resnick 138 kilovolt Transmission Line Rebuild Project, San Patricio County, Texas

THC Tracking #202608866

Dear Mr. Bell,

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 Hecker to Resnick 138 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in San Patricio County, Texas, for potential inclusion in the loan guarantee.

The purpose of this letter is to formally initiate consultation with the Texas State Historic Preservation Officer (SHPO), represented by the Texas Historical Commission (THC), 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 a description 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 and prior SHPO review correspondence (THC Tracking #202608866) is included as Attachment 1, and a Request for SHPO Consultation Form is included as Attachment 2.

The parties listed above that are copied on this letter are invited to participate as consulting parties to the Section 106 consultation and may provide their comments on the undertaking to DOE EDF. In accordance with the confidentiality provisions of the Section 106 regulations at 36 CFR 800.11(c), to avoid the disclosure of potentially sensitive cultural resources information to the public, DOE EDF has respectfully withheld Attachment 1 from dissemination to those members of the public invited to participate as consulting parties. DOE EDF has made this consultation letter available for public view to solicit comments from the general public on the undertaking.

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 approximately 3.5 miles of existing linear transmission line infrastructure in the general location of each pole structure within the existing 100-foot-wide right-of-way (ROW). The Project will include removing existing pole structures, installing new pole structures, and stringing new transmission line. All activities associated with the Project will be located within an existing transmission line ROW that extends through existing industrial facilities and along existing highway easements (see maps included in Attachment 1).

The Project initiates at the existing Hecker Substation and extends northwesterly through an industrialized area up to Texas State Highway 361. From there, it extends southeasterly along the southern Highway 361 easement before turning north to cross the highway and enter an existing electrical facility. It then reverses course and extends back south to the Highway 361 easement where it then continues southeasterly to its terminus at the existing Resnick Substation. Project infrastructure will be placed wholly within existing, heavily disturbed transmission line easement that extends through the industrialized areas and along Highway 361. Construction will primarily occur within an existing transmission corridor, supplemented by additional easement acquisition where necessary. Construction planning assumes the use of temporary matting in portions of the project area due to site conditions, installation of culverts and access improvements, implementation of stormwater controls, and restoration of disturbed areas following construction completion.

The Project scope includes removal of four (4) existing transmission line structures and replacement with four (4) double circuit structures while two (2) structures will remain in place. Existing facilities generally consist of 80-foot-tall steel poles and new facilities will be 100-foot-tall, galvanized steel poles, and new conductors. Existing roads and ROW will be used for construction and no off-ROW access roads are proposed as part of the Project. Construction activities consistent with transmission lines typically include erosion and sediment control, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, and restoration activities following construction completion. Project maps are provided in 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 EDF 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 approximately 3.5-mile-long and 100-foot-wide existing ROW corridor, plus all areas external to the ROW necessary for construction (e.g., pull pads), totaling approximately 42.9 acres. The Project’s architectural survey area includes the ROW and the area within a 0.25-mile 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 four (4) federally recognized Tribes to see if they have an interest in the Project: Apache Tribe of Oklahoma; Comanche Nation, Oklahoma; Tonkawa Tribe of Indians of Oklahoma; and Wichita and Affiliated Tribes (Wichita, Keechi, Waco, and Tawakonie), Oklahoma.

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 process, the Applicant contracted LJA Environmental Services, LLC (LJAES) to conduct a cultural resource desktop identification study and conduct initial coordination with the Texas Historical Commission (THC Tracking #202608866).

LJAES prepared the correspondence and cultural resources study that is included as Attachment 1 and summarized below.

Prior to the initiation of fieldwork, LJAES conducted a file review for a 1-kilometer radius study area surrounding the Project. The online restricted-access Texas Historical and Archeological Sites Atlas was reviewed to identify previously recorded archeological and historical sites within the study area. In addition, previously recorded cultural resource data available online from the Texas Historical Sites Atlas were reviewed to identify the locations of historical sites, cemeteries, National Register of Historic Places (NRHP) properties, State Antiquities Landmarks, and Official Texas Historical Markers recorded within the study area. The Texas Department of Transportation (TxDOT) Historic Resources Aggregator was reviewed for resources that are listed or determined eligible for listing on the NRHP. NPS websites and data centers were reviewed to identify locations and boundaries for historic properties and historic trails. Historical topographic maps and aerial photographs within the APE and 1-kilometer radius study area were also reviewed.

The review indicated three (3) previous cultural resource surveys overlap portions of the Project APE. Six (6) previously recorded archaeological sites are documented within the study area, one of which is mapped within the Project ROW. One (1) recorded cemetery and one (1) historic highway segment are mapped within the 1-kilometer radius study area; however, both are located outside the Project ROW corridor and the 0.25-mile radius APE. No other previously recorded historic resources or NRHP-eligible or listed historic properties are mapped within the study area. Additional details and maps are provided in Attachment 1.

Archaeological and Historic Architectural Resources

Based on review of historical maps and aerial imagery, the Project area was developed for industrial usage (settling basins and drainage control) from the 1960s through the present, with most of the infrastructure development occurring in the 21st century. The Project APE has been subject to intensive modern development, including construction of the transmission line and roadway ROWs and industrial use areas, resulting in significant prior disturbance. As a result, LJAES assessed the archaeological probability of the APE as low; previous disturbance has substantially reduced the potential for intact cultural deposits, historic-era standing structures, or associated historic-era cultural features that would qualify for inclusion in the NRHP within the Project Area.

One (1) previously recorded archaeological site mapped within the Project ROW was originally recorded in 1997. Although the original investigator did not recommend additional evaluation for NRHP eligibility was necessary, the site is currently listed in the Texas Site Atlas as having an “undetermined” eligibility. LJAES’ desktop review indicates that this site was likely destroyed by subsequent construction of transmission infrastructure, and no further work is recommended. The Texas Historical Commission previously concurred with this assessment in correspondence dated May 5, 2026 (see Attachment 1). Additional details and maps are provided in Attachment 1.

Requesting your Concurrence and Next Steps

Based on DOE's review of the efforts to identify historic properties and conclusions drawn from this information, DOE 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 Texas 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**.

The parties listed above that are copied on this letter are invited to participate as Section 106 consulting parties and may provide their comments on the undertaking to DOE EDF **within thirty (30) days of receipt of this letter**. In accordance with the confidentiality provisions of the Section 106 regulations at 36 CFR 800.11(c), to avoid the disclosure of potentially sensitive cultural resources information to the public, DOE EDF has respectfully withheld Attachment 1 from dissemination to those members of the public invited to participate as consulting parties. DOE EDF has made this consultation letter available for public view to solicit comments from the general public on the undertaking.

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 240-687-6117 or via email at EDF_Environmental@doe.gov.

Sincerely,

DONALD BROWN

Donald Brown
Environmental Project Manager
Office of Energy Dominance Financing

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Attachments:

- Attachment 1. Cultural Resources Report and Prior SHPO Correspondence
- Attachment 2. Request for SHPO Consultation Form