



Department of Energy

Washington, DC 20585

September 18, 2026

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

cc:

Caitlin Visel, Uvalde County Historical Commission

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, American Electric Power, La Pryor to Poblano 138 kilovolt Transmission Line Rebuild Project, Uvalde County, Texas

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 La Pryor to Poblano 138 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Uvalde 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 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 0.47 miles of existing 138 kV transmission line located just southwest of Uvalde in Uvalde County, Texas. The proposed Project involves rebuilding existing linear transmission line infrastructure in the general location of each pole structure within a 100-foot-wide right-of-way (ROW). A total of 10 new steel monopoles will be constructed, and the existing wood poles will be removed. All existing structures, generally 50-foot-tall wood poles, will be removed from the ROW and replaced with new structures, generally 80-foot-tall steel monopoles, and conductors. Existing roads and ROW will be used for construction. 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 the cultural resources report that is included as Attachment 1.

Because the Project has distinct end points at Dead End (DE) structures, it is considered a separate and independent utility. The Project can independently manage the flow of electricity based on demand, load, and outages. If the line requires maintenance or experiences a fault, other lines in the vicinity can continue to operate without disruption. This redundancy ensures continuous power supply and communication, enhancing the reliability of the transmission system. This flexibility minimizes disruptions and maintains system stability. These factors demonstrate that the Project functions independently of other nearby existing infrastructure.

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 0.5-mile-long and 100-foot-wide ROW corridor, within which all areas necessary for construction (e.g., pull pads and access roads) will be located, totaling approximately 5.7 acres. The Project's architectural survey area includes the ROW and the area within a 0.25-mile radius of the Project.

DOE EDF also acknowledges that Attachment 1 refers to the archaeological survey area as the "Direct APE" and the architectural survey area as the "Indirect APE", and notes that in accordance with the 2019 D.C. Circuit Court decision in *National Parks Conservation Association v. Semonite*, visual effects that are caused by the undertaking are considered direct effects.

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 five (5) federally recognized Tribes to see if they have an interest in the Project: Apache Tribe of Oklahoma; Comanche Nation, Oklahoma; Mescalero Apache Tribe of the Mescalero Reservation, New Mexico; 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 WSP, Inc. (WSP) to conduct cultural resource identification surveys. WSP prepared the cultural resources report that is included as Attachment 1 and summarized below.

Prior to the initiation of fieldwork, WSP conducted a file review for a 1-mile 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. WSP also reviewed historical topographic mapping and aerial photography within the APE and study area.

The review indicated two (2) previous cultural resource surveys within the 1-mile radius study area, neither of which intersect or overlap the current Project. Four (4) previously recorded archaeological sites are documented within the study area, none of which are within the Project ROW. Two (2) recorded cemeteries are mapped within the study area, neither of which are within the Project ROW corridor, nor within the visible area within a 0.25-mile radius of the Project. Three (3) Official Texas Historical Markers are mapped within the 1-mile radius study area, none of which are within the APE. No NRHP-listed or eligible historic properties are mapped within the 1-mile radius study area. A portion of one (1) historic highway is within the study area but is outside of the APE.

Lastly, WSP previously identified four (4) historic architectural resources within the study area during field investigations they conducted for a separate AEP project, the Uvalde to West Batesville Transmission Line Rebuild Project (**THC Tracking #202612493**). Of these, only one is extant, one has been razed, and two have evidently had their historic structures replaced by modern construction. None of these resources were previously recommended eligible for the NRHP, and the Texas Historical Commission concurred with these recommendations in correspondence dated August 12, 2026. Additional details and maps are provided in Attachment 1.

Following the completion of background research, WSP completed Phase I cultural resource surveys to identify newly recorded archaeological sites and historic architectural resources within the APE. The results of the surveys are provided in Attachment 1 and summarized below.

Archaeological and Historic Architectural Resources

A Phase I archaeological survey was conducted to identify archaeological resources within the Project ROW. The survey was conducted by qualified WSP archaeologists and in accordance with applicable state and federal guidelines. The survey consisted of pedestrian reconnaissance supplemented by subsurface shovel testing where field conditions allowed. A total of 18 shovel tests were excavated within the survey area. Shovel tests were excavated to an average depth of 63 centimeters (25 inches) below the surface. No cultural materials, intact subsurface strata or archaeological deposits, or surface features were identified during the survey. Additional details on the archaeological survey methods and results, maps, photographs, and shovel test descriptions are provided in Attachment 1.

WSP conducted a reconnaissance-level survey to document historic-age architectural resources within the 0.25-mile radius APE. Prior to conducting fieldwork, USGS quadrangle maps and historic aeriels were examined to identify potential historic structures within the APE. Direct line of sight observations were established by driving and walking public roadways to ascertain where existing structures and lines are visible, particularly near structures depicted on historic topographic and aerial maps, to identify and document

buildings and structures within the Project line-of-sight. No newly recorded aboveground historic-age structures were recorded within the APE. Additional information and field photographs are included 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 240-687-7266 or via email at EDF_Environmental@doe.gov.

Sincerely,

Alicia Williamson

Alicia Williamson
Environmental Project Manager
Office of Energy Dominance Financing

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Attachments:

Attachment 1. Cultural Resources Report

Attachment 2. Request for SHPO Consultation Form