



Department of Energy

Washington, DC 20585

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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, Millbrook Park to East Wheelersburg 138kV Transmission Line Rebuild Project, Scioto County, Ohio

OHC Reference No.: 2021-LAW-53256

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 Millbrook Park to East Wheelersburg 138 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Scioto 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.

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.: 2021-LAW-53256). The survey reports that are already on file with the SHPO are not included in this submittal; however, updated reports with results specific to the DOE EDF undertaking are provided as Attachments 1 and 2. The Ohio SHPO previously reviewed and agreed with the conclusions of the initial cultural resource survey reports and five subsequent addenda; the previous SHPO comment letters regarding the earlier report submittals are included as

Attachment 3 for reference. An Ohio SHPO Project Summary Form is included as Attachment 4.

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 8.7 miles of existing transmission infrastructure in the location it exists today within the approximately 100-foot-wide existing right-of-way (ROW). A total of 41 existing transmission structures will be removed and replaced with 43 transmission structures, while two (2) existing transmission structures will remain in place. All existing facilities, generally 65-foot-tall wood poles, will be removed from the ROW and replaced with 31 custom steel monopole suspension/angles, nine (9) custom steel monopole dead-ends, two (2) custom 2-pole dead-ends and one (1) custom 3-pole dead-end, and conductors.

One (1) minor centerline deviation spanning 0.03 mile is necessary to avoid a garage within the existing ROW. Additionally, there are eight (8) areas along the Project route where the ROW corridor width must be expanded greater than 100 feet, accounting for approximately 11 acres of additional ROW:

1. 0.19 mile of ROW expansion to a maximum width of 128 feet between proposed transmission structures 9 and 10
2. 0.16 mile of ROW expansion to a maximum width of 119 feet between proposed transmission structures 12 and 13
3. 0.27 mile of ROW expansion to a maximum width of 157 feet between proposed transmission structures 15 and 16
4. 0.16 mile of ROW expansion to a maximum width of 121 feet between proposed transmission structure 16 and existing structure 138B
5. 0.21 mile of ROW expansion to a maximum width of 135 feet between proposed transmission structures 21 and 22
6. 0.11 mile of ROW expansion to a maximum width of 1220 feet between proposed transmission structures 36 and 37
7. 0.36 mile of ROW expansion to a maximum width of 199 feet between proposed transmission structures 42 and 43
8. 0.14 mile of ROW expansion to a maximum width of 1198 feet between proposed transmission structures 43 and 44

Construction access roads and work pads will be placed within the ROW or immediately adjacent to the ROW, except in locations where greater deviations are necessary to navigate steep topography or to avoid hydrological features. 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 112.05 acres) and proposed temporary access roads and construction workspace extending outside the ROW (approximately 31.5 acres), totaling approximately 143.55 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 five addenda, and submitted these to the Ohio SHPO for advance review as part of AEP's environmental due diligence review (**OHC Reference No.:** 2021-LAW-53256). The initial reports included survey coverage of a much broader 34.7-mile span of AEP transmission line infrastructure (Millbrook Park to South Point), which included the current 8.7-mile Project, but also extended further south/southeast to the Scioto County line and through neighboring Lawrence County. For DOE EDF's Section 106 review of the Project, this consultation only considers the resources and historic properties identified within the APE for the current 8.7-mile Project. To facilitate DOE EDF's consultation on the Project, Weller prepared updated cultural resource survey reports that provide survey results within the current APE only (Attachments 1 and 2). The results of the archaeological and historic architectural surveys of the current Project APE 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-mile radius of the Project. This background research identified eleven (11) previous cultural resource surveys conducted in the 1-mile-radius study area. Four (4) previously recorded archaeological sites were identified in the study area, none of which are within the Project ROW. A total of 49 previously recorded Ohio Historic Inventory (OHI) resources were identified in the study area, all of which are outside of the ROW. No NRHP-listed historic properties are within the study area, and two (2) prior SHPO determinations of eligibility are within the study area—one of which is within the APE. Lastly, 12 cemeteries were identified in the study area, all of which are outside of the 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. Weller subsequently prepared five addendum reports covering additional Project areas that were not included in the initial surveys. The results of those additional investigations are provided in Attachments 1 and 2 and summarized below. The earlier reports are already on file with SHPO and thus are not included with this submittal; prior SHPO correspondence related to the earlier submittals is included as Attachment 3.

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. Steep slope terrain exceeding 15 percent, severe disturbances, and wet/inundated areas accounted for a large part of the area surveyed; these areas were omitted from subsurface archaeological testing. Visual inspection was

conducted in these situations to verify the conditions as well as identify possible natural features such as rock shelters. Some of the disturbances are associated with modern construction activities such as urban grading, transportation routes, and preparation for developments. Ponds, saturated areas or inundated conditions account for a small part of the overall project corridor. Previous investigations intercept the APE, but do not account for a sizeable component of the overall area surveyed. Areas that were the subject of previous surveys were not resurveyed during the current effort as they were 1) surveyed in an acceptable manner that is consistent with current state guidelines, 2) the area has been subsequently disturbed, and 3) the prior surveys did not identify any resources within the current Project corridor.

Subsurface shovel testing was conducted in the areas where the conditions were suitable. During the initial survey, a total of 185 shovel test units and 11 shovel probes were excavated. All of the sites/artifacts that were identified during this method of sampling were encountered within topsoil or plowzone contexts; there were no deeply buried or discrete cultural deposits or stratigraphic levels identified.

The survey identified eight (8) new archaeological sites in the APE of the current Project (33SC0679-0684, and 33SC0686-0687). All eight 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). After the initial survey, additional archaeological survey work was conducted to address proposed additional areas of disturbance, ROW slivers, and access roads that were not within the original surveyed area. No additional archaeological resources were identified within the APE as a result of the addendum surveys. Additional details on the archaeological survey methods and results, maps, and photographs are provided in Attachment 1, as well as the earlier archaeological survey reports on file with SHPO (**OHC Reference No.:** 2021-LAW-53256). Prior SHPO comment letters regarding the earlier report submittals are included as Attachment 3.

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 architectural survey identified a total of 202 resources 50 years of age in the APE. Five mapped resources were found to be demolished or otherwise non-extant. Building types and styles are consistent with patterns of settlement in the area. Most of the buildings are vernacular with no academic style; however, a few exhibit high styles and influences including, Queen Anne, Tudor Revival, Contemporary, and Greek Revival.

One (1) OHI resource (SCI0075114) is eligible for listing in the NRHP (SHPO Determination of Eligibility # 1085660). None of the other 201 resources in the APE were found to be associated with significant events, patterns of events, or individuals in a manner necessary for inclusion in the NRHP under Criterion A or B. The buildings are typical of others in the area and throughout Ohio, are not the works of a master, and do not exhibit distinctive character-defining features; therefore, the resources are not eligible for inclusion in the NRHP under Criterion C. Additional details, maps, and photographs are included in

Attachment 2, as well as the earlier architectural survey report on file with SHPO (**OHC Reference No.:** 2021-LAW-53256). Prior SHPO comment letters regarding the earlier report submittals are included as Attachment 3.

Description of the Undertaking's Effects on Historic Properties

OHI resource SCI0075114 is eligible for listing in the NRHP under Criterion C as an intact example of the Tudor Revival style. The house appears to retain most, if not all, of its distinctive character-defining features and has undergone little, if any, alteration. The property is located approximately 600 feet west of the Project ROW, and no physical effects on the architectural character-defining features of the property will occur as part of the Project. 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 physical alterations to the resource would occur, and no visual, atmospheric, or audible elements will be introduced in a manner that would disqualify the resource from being considered 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,

Todd Stribley
Director, Environmental Programs
Office of Energy Dominance Financing

Attachments:

Attachment 1. 2026 Project Archaeological Survey Report

Attachment 2. 2026 Project Architectural History Survey Report

Attachment 3. Previous SHPO correspondence (re: 2021-LAW-53256)

Attachment 4. Ohio SHPO Project Summary Form