



Department of Energy

Washington, DC 20585

August 10, 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, North McConnellsville-South Rokeby 69kV Transmission Line Rebuild Project, Morgan County, Ohio

OHC Reference No.: 2026-MRG-68532

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 North McConnellsville-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. Cultural resource reports are included as Attachments 1 and 2. An Ohio SHPO Project Summary Form is included as Attachment 3.

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.: 2026-MRG-68532). The Ohio SHPO has previously reviewed and agreed with the conclusions of these reports in letters dated June 9, 2026 and June 30, 2026 (Attachment 4), and DOE EDF 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 0.23 miles of existing 69kV transmission line in the location it exists today and expanding the existing 50-foot-wide ROW to a proposed new width of 60 feet. A total of eight (8) existing transmission structures will be removed and replaced with six (6) new transmission structures. Existing facilities within the ROW, generally consisting of 65-foot-tall wood poles, will be removed and replaced with new 80-foot-tall H-frame structures or galvanized steel poles, as well as new overhead conductors and shield wire. Access roads and work pads will be placed within the ROW, or immediately adjacent the ROW, for use during 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 resource reports included as Attachments 1 and 2.

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 ROW corridor (including both existing and new ROW, a total of approximately 1.75 acres) and proposed access roads and temporary construction workspace (approximately 0.23 acres), totaling approximately 2.0 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 cultural resources reports summarized below and included as Attachments 1 and 2.

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, three (3) of which partially overlap the Project APE. Two (2) previously recorded archaeological sites were identified in the study area, neither of which are within the APE. One (1) NRHP-listed historic property, the Muskingum River Navigation Historic District, is within the study area. The search did not identify any previously recorded historic resources, cemeteries, or potentially historic structures within the APE.

Following the completion of background research, Weller completed a Phase I cultural resources survey to identify newly recorded archaeological sites and historic architectural resources within the APE. The results of the survey are summarized below, and provided in Attachments 1 and 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, which includes an existing and fenced switch station at the eastern terminus and an industrial facility at the western terminus. Visual inspection was conducted in the areas that were clearly disturbed from modern development; subsurface testing methods were conducted in the remainder of the area. A total of 31 shovel tests were excavated in the survey area, none of which identified cultural material or archaeological deposits. Therefore, no archaeological sites were identified within the APE. Additional details on the archaeological survey methods and results, maps, and photographs are provided in Attachment 1.

An addendum archaeological survey was conducted to address proposed additional areas of disturbance that are situated outside of the original surveyed area. The survey area was found to be fully disturbed by shovel probe testing and visual inspection. There were some areas that were encountered where archaeological testing was not necessary and the work was limited to visual inspection. The disturbed areas pertain to proposed access drive locations. These areas have been disturbed by grading and filling as was caused by construction activity for extant facilities. No archaeological resources were identified within the APE. Additional details, maps, and photographs are provided in Attachment 2.

Historic Architectural Resources

Attachment 1 notes that multiple recent (2023) previous surveys by Weller had covered the entire architectural survey area, and SHPO concurred with the results of those surveys (see Attachment 1, Appendix); therefore, a new aboveground resource survey for this Project was not warranted. The previous surveys concluded there would be no adverse effect on historic properties, including the Muskingum River Navigation Historic District. The addition of this Project to the already industrial setting at the Project location will not further alter the setting of the Muskingum River Navigation Historic District in a manner that would disqualify it from being eligible for listing in the NRHP; therefore, the Project would have **no adverse effect** on historic properties. Additional details, maps, and photographs are included in Attachment 1.

The addendum survey (Attachment 2) did not involve any additional architectural resources that were not previously addressed.

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. Cultural Resources Report
- Attachment 2. Addendum Survey Report
- Attachment 3. Ohio SHPO Project Summary Form
- Attachment 4. Previous SHPO correspondence (re: 2026-MRG-68532)