



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, Sadiq Switch-East Wheelersburg 138kV Transmission Line Rebuild Project, Scioto County, Ohio

OHC Reference No.: 2022-SCI-53601

Dear Ms. Welling,

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has issued a Federal loan guarantee to 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 Sadiq Switch-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), and the efforts to identify historic properties, and seeks your concurrence with DOE's Finding of No Historic Properties Affected 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.: 2022-SCI-53601). The Ohio SHPO has previously reviewed and agreed with the conclusions of these reports in a letter dated February 9, 2022 (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 2 miles of the existing Sadiq Switch-East Wheelersburg 138kV transmission line between the East Wheelersburg Station and the Sadiq Switch, which will involve rebuilding the existing transmission line adjacent and parallel to its current location (approximately 50 feet offset from the existing transmission line) so that AEP can keep the existing line energized until the rebuild is complete. A total of 12 existing approximately 65-foot-tall wood pole structures will be removed and replaced with 13 approximately 80-foot-tall steel poles, as well as overhead conductors and shield wire. Access roads and work pads will be placed within the right-of-way, or immediately adjacent to the right-of-way, for use during construction. The general construction process will entail erosion and sediment control installation, access road work, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, removal of existing structures, 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 100-foot-wide ROW corridor (including both existing and new ROW, a total of approximately 24.38 acres) and proposed access roads and temporary construction workspace (approximately 4.86 acres), totaling approximately 29.24 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 one (1) previous cultural resource survey conducted south of the current study area, but not overlapping the Project APE. The search did not identify any previously recorded archaeological sites, historic resources, NRHP-listed historic properties, 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, the majority of which consists of steeply sloped terrain, inundated areas, and severely disturbed areas (related to prior construction of the station and switch facilities located at either end of the Project). There were two (2) shovel test units excavated within the northern part of the archaeological survey area, which was the only area deemed suitable for subsurface testing. The testing was conducted within a

floodplain setting and the topsoil deposits were comparably deeper than would be anticipated from upland conditions. The shovel tests recorded encountering the interface with sterile subsoil at 38 centimeters below surface (cmbs) and terminating excavation at approximately 50 cmbs. No cultural material or archaeological deposits were identified. Therefore, no archaeological sites were identified within the APE. Additional details on the archaeological survey methods and results are provided in Attachment 1.

Historic Architectural Resources

The historic architectural survey included photographic documentation for above-ground resources in the APE that met the minimum 50-year threshold for NRHP consideration. A total of three (3) historic architectural resources were identified. The resource types recorded included vernacular residences and a pumping station. None of the identified historic architectural resources within the APE were recommended as eligible for inclusion in the NRHP. Therefore, DOE EDF has determined no historic properties were identified within the APE. Additional details, maps, and photographs are included in Attachment 2.

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 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 Ohio 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**.

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. Archaeological Survey Report

Attachment 2. Historic Architecture Survey Report

Attachment 3. Ohio SHPO Project Summary Form

Attachment 4. Previous SHPO correspondence (re: 2022-SCI-53601)