



Department of Energy

Washington, DC 20585

March 19, 2026

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

cc:

Jordan Jarrett, National Park Service-National Trails Office Cultural Resources Specialist
Jill Jensen, National Park Service-National Trails Office Planner
Jeff Salmon, Taylor County Historical Commission
Mason Teegardin, City of Abilene Certified Local Government

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, American Electric Power, Abilene Northwest to Mulberry Creek 138kV Transmission Line Rebuild Project, Taylor County, Texas

Dear Mr. Bell,

Pursuant to its authority under Title XVII of the Energy Policy Act of 2005, as amended, which established a Federal loan guarantee program, the U.S. Department of Energy (DOE) Office of Energy Dominance Financing (EDF) is evaluating whether to provide a Federal loan guarantee to American Electric Power (AEP, or the Applicant) for the Abilene Northwest (NW) to Mulberry Creek 138 kilovolt (kV) Transmission Line Rebuild Project (the Project) located in Taylor County, Texas.

The purpose of this letter is to formally initiate consultation with the Texas 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 a description 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.

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 for this undertaking 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), the version of Attachment 1 provided to the consulting parties has been redacted to avoid the disclosure of potentially sensitive cultural resources information to the public. DOE EDF respectfully requests the invited consulting parties not share these materials with outside parties or the public.

Description of the Undertaking

DOE's action is the issuance of a proposed Federal loan guarantee to the Applicant for the undertaking (i.e., the Project), which includes the rebuild of approximately two (2) miles of existing 138 kV transmission line beginning at the Abilene NW Substation and extending northwest to Structure Dead End (DE) 8. The proposed Project involves rebuilding existing linear transmission line infrastructure in the general location of each transmission pole structure within the existing 100-foot-wide right-of-way (ROW). A total of 22 new steel monopoles will be constructed and the existing wood poles with cross bracing structures will be removed. The proposed Project also includes upgrading jumpers at the Abilene NW Substation. All existing transmission structures, generally 50-foot-tall wood poles, will be removed from the ROW and replaced with new transmission 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.

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 2-mile-long segment of existing 100-foot-wide transmission line ROW within which Project ground-disturbing activities may occur, totaling approximately 24.1 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 five (5) federally recognized Tribes to see if they have an interest in the Project: Apache Tribe of Oklahoma; Comanche Nation, Oklahoma; Delaware 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 and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is necessary or requested.

Records Search

As part of the Section 106 process, the Applicant contracted WSP USA 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 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 1-mile-radius study area. The TxDOT Historic Resources Aggregator was reviewed for resources that are listed or determined eligible for listing on the NRHP. At the national level, NPS websites and data centers were reviewed to identify locations and boundaries for historic properties and historic trails. The review indicated five (5) previously recorded archeological sites and one (1) previous archeological survey are mapped within the 1-mile-radius Study Area, none of which overlap the current Project APE. Additionally, the Butterfield Overland National Historic Trail (NHT) is mapped as crossing the Project ROW.

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 Resources

The archaeological field survey consisted of pedestrian walkover of the archaeological survey area employing visual inspection of the ground surface and subsurface testing at 30-meter intervals where conditions allowed. Systematic survey of at least a single transect was undertaken since the Project ROW did not exceed 30 meters (98.4 feet) wide. The survey entailed intensive surface inspection as well as the excavation of shovel tests along the entirety of the ROW. Shovel tests were excavated unless irrefutable evidence of bedrock across the entire surface of the area was observed, or there was evidence of significant ground disturbance. All such locations are clearly delineated on project maps, photo-documented, and discussed in the report.

The field survey encompassed an area of 24.1 acres. A total of 89 shovel tests were excavated within the APE. Four (4) newly recorded archaeological sites (41TA487, 41TA488, 41TA489, and 41TA490), and one (1) isolated find (IF-001) were recorded during the investigation. Each of these resources consist of surface lithic artifact scatters. All shovel tests excavated were negative for the recovery of cultural material; furthermore, no intact subsurface strata or evidence of preserved subsurface or surface features was detected through shovel testing. This suggests that past and/or modern agricultural practices have caused prior disturbance that has depleted the potential for intact archaeological preservation within the APE.

Since the survey effort was restricted to the Project ROW, site boundaries could not be fully delineated by WSP, and overall NRHP eligibility determinations cannot be made. However, given that each site was limited to a surface expression of cultural material, and due to the lack of subsurface strata or features present, the paucity of diagnostic artifacts observed, the limited variety of artifacts observed, and overall dispersed and ephemeral nature of the surface scatters, the portions of each site recorded within the APE appear to have limited research potential and are unlikely to contribute to the overall eligibility of each resource.

Additional details, maps, and photographs are provided in Attachment 1.

Historic Architectural Resources

The historic architectural survey included a pedestrian and/or windshield survey from the Project ROW and/or public road ROW of any buildings or structures within the architectural survey area that are 50 years of age or older. Historic architectural resources located within Project APE were photographically documented and recorded on Project maps. Pre-field review of historic maps identified three potential historic architectural resources within the APE. Of these, one (1) architectural resource could be recorded while the remaining two buildings were either previously razed or were not visible from the Project or public ROWs and thus were not recorded in detail. The razed structure that is no longer extant would not be considered eligible for the NRHP. Because the Project ROW is adjacent to the ROW of an existing transmission line, the viewshed of the resource WSP

could not record in detail (or were no longer extant) will not be significantly altered by the Project and no additional survey of those resources is warranted.

Architectural Resource 1 (recorded in-field) is a common ranch-style residence with associated outbuildings. There are no indications that the resource has any associations with events, patterns of history, or individuals that would make it eligible for listing on the NRHP under Criteria A or B. The historic-age resource is a pole structure with a metal roof that does not exhibit a distinct architectural style or rarity of preservation that would make it eligible for the NRHP under Criterion C. There are no indications that further research into the building would reveal information important to our past that would make it eligible under Criterion D. Therefore, this resource is not eligible for inclusion on the NRHP.

Additional details, maps, and photographs are provided in Attachment 1.

National Historic Trail

Additionally, the Butterfield Overland NHT, as mapped by the NPS and TxDOT, crosses the Project ROW.¹ In this area, the mapped location of the historic trail is based on historical information that has not been field verified. The section of the APE where the Butterfield Overland NHT is mapped as intersecting the Project was investigated during the field survey. WSP archeologists visited the mapped location of the trail where it crosses the APE. The investigation followed the same methods described above, using both pedestrian surface inspection and subsurface shovel testing. Eight (8) shovel tests were excavated within the ROW near the mapped trail location, all of which were negative for the recovery of cultural material. No intact subsurface strata or evidence of preserved subsurface or surface features was detected during the survey. Ground surface inspection did not identify any surface features or other preserved surficial evidence of the trail throughout the APE. This suggests that past and/or ongoing agricultural activity in the area has caused prior disturbance that has depleted the potential for intact preservation of the NHT within the Project APE.

Description of the Undertaking's Effects on Historic Properties

Four (4) archaeological sites are partially within the Project ROW and extend beyond the limits of the Project ROW and, therefore, cannot be evaluated for NRHP eligibility in full. However, the portions of these sites that were investigated within the APE appear to hold little to no research value due to a lack of diagnostic material culture and a lack of depositional integrity; and therefore, the portions of these sites within the APE would not be considered as contributing to any of the sites' potential NRHP eligibility, were they to be fully delineated and evaluated in the future. Thus, while the four (4) archaeological sites remain "unevaluated" for NRHP eligibility, DOE EDF finds the portions of the sites within

¹ Per Public Law 117-345, 136 Stat. 6196-6197, the "Butterfield Overland National Historic Trail Designation Act," Section 2(F), the Project is exempt from review under the National Trails System Act. DOE EDF confirmed this with the National Park Service (NPS) National Trails Office via electronic correspondence on March 17, 2026, and DOE EDF has invited the NPS to participate as a consulting party under Section 106 of the NHPA.

the APE would be non-contributing; therefore, the Project would have no adverse effect on them.

Similarly, one (1) historic architectural resource in the APE could not be recorded in detail due to lack of visibility from the Project ROW and/or public road ROW and thus remains “unevaluated” for NRHP eligibility. However, the resource is nearly outside the 0.25-mile APE and the visibility of and from the Project is limited due to this distance. Furthermore, because the Project involves the proposed replacement of transmission structures adjacent to the ROW of an existing transmission line, the Project will not constitute a new or novel visual intrusion to the setting of the resource and the viewshed of this potential historic property will not be significantly altered by the Project. Thus, the Project would have no adverse effect on this potential historic property.

The area where the Butterfield Overland NHT is mapped as intersecting the Project was investigated during the field survey. No evidence of the NHT was found during the survey effort, as described above; the NHT appears to no longer be extant within the Project APE. The NHT overall includes nearly 3,300 miles originating in Tipton, Missouri and Madison, Arkansas, and terminating in San Francisco, California. The Project ROW being just 100 feet wide overlaps a comparably small 100-foot section of the length of the NHT. The mapped area where the NHT intersects the Project ROW falls within an overhead transmission line span (see Attachment 1, Figure 3, Pages 2 and 3), and no ground disturbance related to the installation or removal of Project transmission structures is proposed for the mapped location of the NHT. As discussed above, the archaeological and historic architectural resources identified within the APE include precontact-era Native American sites and historic structures from the mid-to-late twentieth century; none of these resources appear to be associated with the historic trail or its period of significance. Lastly, because the Project involves the proposed replacement of transmission structures adjacent to the ROW of an existing transmission line, the Project will not constitute a new or novel visual intrusion to the setting of the NHT and the viewshed of the NHT will not be significantly altered by the Project.

While the NHT as a whole was not investigated or assessed as part of this Project, because the relatively short segment of the NHT within the APE appears to be no longer extant, no ground disturbance is proposed to occur in the mapped location of the NHT, and because the Project will not alter the setting, DOE EDF finds the Project would not diminish the overall historic significance of the NHT; therefore, the Project would have no adverse effect on the Butterfield Overland NHT.

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 Adverse Effect, consistent with 36 CFR § 800.5(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the Texas 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.**

The parties listed above that are copied on this letter are invited to participate as consulting parties to the Section 106 consultation for this undertaking 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), the version of Attachment 1 provided to the consulting parties has been redacted to avoid the disclosure of potentially sensitive cultural resources information to the public. DOE EDF respectfully requests the invited consulting parties not share these materials with outside parties or the public.

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,edf 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. Request for SHPO Consultation Form