



Department of Energy

Washington, DC 20585

July 30, 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 Transmission Systems Incorporated, Ironville to Lapier 69 kV Transmission Line Rebuild Project, Lucas County, Ohio

OHC Reference No.: 2024-LUC-61334

Dear Ms. Welling,

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 Transmission Systems Incorporated (ATSI, or the Applicant) for the Ironville to Lapier 69 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Lucas County, Ohio.

The purpose of this letter is to formally initiate consultation with the Ohio State Historic Preservation Officer (SHPO), represented by the Ohio Historical and Museum Commission (PHMC), 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 Historic Properties Affected for this Project.

Cultural resource reports are included as Attachments 1 and 2. Previous SHPO correspondence related to this Project prior to DOE EDF's involvement is included as Attachment 3. A SHPO Project Summary Form is included as Attachment 4.

The Applicant previously submitted the Project (Attachment 1) to the Ohio SHPO on May 16, 2024, 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.: 2024-LUC-61334). The Ohio SHPO previously reviewed the Project in a letter dated June 10, 2024, which stated that based on the height of the new infrastructure height not exceeding that of the existing infrastructure, and that no tree clearing is anticipated, it is the SHPO's opinion that no cultural resource studies are warranted and, as

proposed, the Project will have no effect on historic properties. The Applicant subsequently completed an addendum cultural resources review (Attachment 2) which was submitted to the SHPO on April 18, 2025. SHPO agreed with the conclusions of the addendum in a letter dated June 3, 2025. The previous SHPO correspondence is included as Attachment 3. 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 a Federal loan guarantee to the Applicant for the undertaking (i.e., the Project), which involves the replacement of four (4) existing double circuit tower structures with custom and standard engineered structures and installation of two (2) new double circuit deadend steel poles to provide the strength and clearance to span approximately 0.7 miles crossing the Maumee River and adjacent railroad tracks. The locations of the new transmission structures will be near the existing transmission structures and all Project work will occur within the existing 200-foot-wide Right-of-way (ROW) and designated workspace adjacent to the ROW.

The Project would replace existing transmission towers 51 and 54 with double circuit deadend steel poles, replace existing towers 52 and 53 with double circuit suspension structures with custom deep foundations, and install two (2) new double circuit deadend steel poles, 50A and 54A, between structures 50 and 51 and between structure 54 and the Lapier substation, respectively. The Project would also install new shield wire and conductor from structure 50A to the Lapier substation and would transfer existing conductor and shield wire to new structures 50A and 54. Ground disturbance associated with the Project is primarily related to the replacement and upgrade of existing transmission and substation infrastructure. Typical activities include removal and replacement of transmission structures, excavation for pole and site grading for equipment and foundations, conductor installation, and equipment replacement within substation facilities. 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 (approximately 5.4 acres) and any proposed access roads or temporary construction workspace located outside of the ROW (approximately 16.9 acres), totaling approximately 22.3 acres. The Project's architectural survey area includes the ROW and a 0.25-mile radius surrounding the ROW.

In the original SHPO correspondence regarding the Project (see Attachment 3), SHPO stated that the Project will have no effect on above ground historic properties, should they exist. As such, no above ground resources survey was warranted for this 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 eleven (11) federally recognized Tribes to see if they have an interest in the Project:

1. Delaware Nation, Oklahoma
2. Eastern Shawnee Tribe of Oklahoma
3. Hannahville Indian Community, Michigan
4. Little Traverse Bay Bands of Odawa Indians, Michigan
5. Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan
6. Miami Tribe of Oklahoma
7. Ottawa Tribe of Oklahoma
8. Seneca Nation of Indians
9. Seneca-Cayuga Nation
10. Shawnee Tribe
11. Wyandotte 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 TRC Environmental Corporation (TRC) to conduct cultural resource surveys. TRC prepared the cultural resources report summarized below and included as Attachment 1.

TRC 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 one (1) NRHP-listed historic property within the 1-mile study area, located 0.7 mile from the Project and well outside the APE. Additionally, one NRHP-eligible resource is located within the 1-mile study area, located 0.65 mile from the Project and also outside the APE. Five (5) previous cultural resource surveys have been conducted in the study area, one (1) of which is directly adjacent to the Project ROW. A total of 13 previously recorded archaeological sites were identified in the 1-mile radius study area, none of which are located within the Project ROW. A total of 317 previously recorded historic above ground resources and one (1) railroad bridge are located within the 1-mile radius study area. Substantially fewer above ground historic resources appear to be located within the 0.25-radius APE (see Attachments 1 and 2), and due to the nature of the Project, there will be no effect on these resources (see Attachment 3). The search did not identify any previously recorded cemeteries or other potentially historic structures within the APE. Maps of the APE and the records search results are included in Attachment 1.

Historically, the landscape of the APE was likely riverbank, floodplain and marshland along the Maumee River. Throughout the late nineteenth and into the twentieth centuries, the landscape changed from open and rural with residential properties to built-up, man-made riverbanks and industrial development. Between 1921 and 1934, the southern portion of the APE transitioned from the residential settlement of Ironville to an industrial complex. Historic maps of the Project area are included in Attachments 1 and 2.

Presently, the landscape is a combination of industrial and other developed land. Following the completion of background research, TRC completed site visits to conduct pedestrian walkover and to visually inspect and photographically document the previously disturbed environs of the APE. Maps and photographs are provided in Attachments 1 and 2.

In conclusion, TRC conducted a records search and pedestrian inspection of the Project on behalf of the Applicant. The results of these efforts are provided in the Project Summary Form and cultural resources letter report supplement that are included as Attachments 1 and 2. Because the proposed Project's new transmission infrastructure will not exceed the height of the existing infrastructure, no tree clearing is required, replacement towers will be placed nearby the existing towers, and the APE has been previously significantly disturbed through past residential and industrial development, the Project will not affect historic properties and no additional cultural resources surveys are warranted. The SHPO provided this opinion in previous correspondence (see Attachment 3). In accordance with 36 CFR 800.4(b)(1), DOE EDF has considered past research and studies, the magnitude

and nature of the undertaking and the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects; and has concluded that the level of effort demonstrated in Attachments 1 and 2 is sufficient to meet the requirements of Section 106.

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, 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 240-474-2403 or via email at EDF_Environmental@doe.gov.

Sincerely,

Christina Gomer
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

- Attachment 1. 2024 Cultural Resources Report
- Attachment 2. 2025 Cultural Resources Addendum
- Attachment 3. Previous SHPO correspondence (OHC Reference No.: 2024-LUC-61334)
- Attachment 4. SHPO Project Summary Form