



Department of Energy

Washington, DC 20585

July 28, 2026

Barbara Frederick
Environmental Review Division Manager
Pennsylvania Historical and Museum Commission
Pennsylvania State Historic Preservation Office
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, Pennsylvania 17120

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Mid-Atlantic Interstate Transmission, Johnstown-Seward 230 kV Transmission Line Rebuild Project, Westmoreland, Indiana, and Cambria Counties, Pennsylvania

ER Project #: 2024PR03888

Dear Ms. Frederick,

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 Mid-Atlantic Interstate Transmission, Inc. (MAIT, or the Applicant) for the Johnstown-Seward 230 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Westmoreland, Indiana, and Cambria Counties, Pennsylvania.

The purpose of this letter is to formally initiate consultation with the Pennsylvania State Historic Preservation Officer (SHPO), represented by the Pennsylvania 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 Adverse Effect for this Project. A cultural resource report is included as Attachment 1.

The Applicant 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 (ER Project #: 2024PR03888). The Pennsylvania SHPO previously reviewed the Project in a letter dated August 30, 2024, in which they requested a Phase I archaeological survey be conducted, but also stated that the Project will have no effect on above ground historic properties, should they exist. As such, no above ground resources survey was conducted for this Project. The Applicant completed the archaeological survey (see Attachment 1) and SHPO agreed with the conclusions of the

report in a letter dated December 23, 2024. The previous SHPO correspondence is included as Attachment 2. 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 installation of approximately 6.7 miles of new 230 kV transmission line within the existing 150-foot-wide right-of-way (ROW). The existing easements allow for the installation of the proposed structure replacements, and no new ROW or easements are required for the Project. The Project will utilize approximately 10 miles of access roads for construction, approximately 4 miles of which are located outside the existing ROW.

The proposed Project will replace 59 of the existing 61 transmission structures. The transmission structure immediately adjacent to the Seward Substation, Structure #61, will remain. Existing Structure #26 will be removed and not replaced. The 59 new structures to be installed are comprised of the following. Two (2) steel monopole delta strain/dead-end structures, three (3) steel H-frame strain/dead-end structures, 46 steel H-frame suspension structures, three (3) steel pole angle structures, two (2) steel three-pole strain/dead-end structures, three (3) steel pole angle structures with davit arms. The height of the proposed new structures will range from 57 to 98 feet above ground. The average existing structure height is approximately 75 feet above ground, and the proposed new average structure height is also approximately 75 feet above ground. The average existing span length is approximately 565 feet, and the average proposed span length will be approximately 576 feet.

Project maps are provided in the cultural resource report 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 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 and any proposed access roads or temporary construction workspace located outside of the ROW, totaling approximately 143.5 acres.

In the original SHPO correspondence regarding the Project (see Attachment 2), 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 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; The Osage Nation; Seneca Nation of Indians; 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 GAI Consultants, Inc. (GAI) to conduct cultural resource surveys. GAI prepared the cultural resources report summarized below and included as Attachment 1.

GAI conducted a search of various archival sources, the Pennsylvania SHPO inventory database (PA-SHARE), and the National Register of Historic Places (NRHP) to identify previously conducted surveys and previously recorded cultural resources and historic properties within a 0.5-mile radius of the Project. This background research identified six (6) previous cultural resource surveys conducted in the study area, three (3) of which partially overlap the Project APE. Eight (8) previously recorded archaeological sites were identified in the study area, two (2) of which partially overlap the APE. A total of 14 previously recorded historic above ground resources are located within the 0.5-mile radius study area. One (1) NRHP-listed historic property, the Western Division of Pennsylvania Canal, is within the 0.5-mile radius study area. The search did not identify any previously recorded cemeteries or other potentially historic structures within the APE.

Following the completion of background research, GAI completed a Phase I archaeological survey to identify newly recorded archaeological sites within the APE. The results of the survey are summarized below and provided in Attachment 1.

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. Phase I survey began with a surface reconnaissance of the Project APE to provide preliminary assessments of archaeological potential and to target areas that would be subject to subsequent subsurface testing. Portions of the Project APE characterized by previous disturbance (primarily road disturbance, as well as underground utility corridors and residential construction), steep slopes (in excess of 15 percent), lack of topsoil or heavily deflated soils, or saturated soils/water were considered to have low archaeological potential. These areas were mapped, photographed, and limited to surface reconnaissance and judgmental shovel testing. Shovel tests were excavated at 15-meter intervals on a grid system within high probability areas, and expanded to 30-meter intervals within areas of moderate probability.

GAI excavated a total of 484 shovel tests, 309 of which are located within high probability areas, 162 located in moderate probability areas, and 13 judgmental shovel tests were placed within low probability settings.

The boundaries of two previously recorded archaeological sites (36CB0160 and 36CB0146) each slightly overlap the Project APE. The very southern edge of 36CB0160 site boundary intersects a small portion of an access road. GAI conducted 15-meter interval shovel testing through the APE in the vicinity of the recorded site boundary, and no cultural resources were identified at this location. The Peter Dishong Farmstead (36CB0146) represents the former location of the Peter Dishong farmhouse that was recorded in 1990. Based on the 1990 site form, the house was moved to a different location, and the foundation has been filled. GAI conducted 15-meter interval shovel testing through the APE in the vicinity of the recorded site boundary and visually searched for the site; however, no cultural materials or features were identified.

The survey identified two (2) new historic-era archaeological sites (36CB0226 and 36WM1544) and two (2) isolated finds. The isolated finds are considered not eligible for inclusion in the NRHP, and the two new sites are summarized below.

Site 36WM1544 represents an industrial site associated with a mid-twentieth century strip mining operation. Due to the paucity of significant cultural materials or features identified, the site is recommended as not eligible for inclusion in the NRHP.

Site 36CB0226 represents a nineteenth-to-twentieth century farmstead belonging to the Dishong family, early settlers of Cambria County. The early components to this site related

to the Dishong family occupation are situated outside of the Project APE. The farmhouse was previously recorded as an above ground resource (2019RE08976); however, no standing structures were present at the time of survey. The survey identified artifacts and remnant surface features (concrete pad, foundation) associated with the mid-twentieth century component of the site. Because the site extends beyond the limits of the APE, the NRHP eligibility status of the site remains unevaluated; however, given the limited proposed disturbance to the site (improvement of a former farm road for use as a Project access road) and the portion of the site within the APE bearing association with the mid-twentieth century rather than the nineteenth century Dishong-family occupation, it is recommended that the Project will have **no adverse effect** on the portions of Site 36CB0226 within the APE nor the overall site's potential eligibility for listing in the NRHP.

Therefore, no eligible or listed historic properties were identified within the APE, and the Project will have **no adverse effect** on unevaluated Site 36CB0226. Additional details on the archaeological survey methods and results, maps, photographs, and site descriptions are provided in Attachment 1. Previous SHPO concurrence with these findings is provided 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 Adverse Effect, consistent with 36 CFR § 800.5(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the Pennsylvania 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 240-474-2403 or via email at EDF_Environmental@doe.gov.

Sincerely,

Christina Gomer
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. Cultural Resources Report

Attachment 2. Previous SHPO correspondence (re: ER Project # 2024PR03888)