



Department of Energy

Washington, DC 20585

April 30, 2026

Heather Gibb
State Historic Preservation Officer
Iowa Department of Cultural Affairs
1963 Bell Avenue, Suite 200
Des Moines, IA 50315

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Interstate Power and Light Company, Bobcat Energy Center Project, Marshall County, Iowa

Dear Ms. Gibb,

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 Interstate Power and Light Company (IPL, or the Applicant), Alliant Energy's Iowa utility company, for the Bobcat Energy Center Project (the Project), located in Marshall County, Iowa.

The purpose of this letter is to formally initiate consultation with the Iowa 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 seeks your concurrence with DOE's Finding of No Historic Properties Affected for this Project.

Cultural resource identification reports that include Project maps and photographs are provided as Attachments 1 and 2.

Description of the Undertaking

DOE's action is the issuance of a proposed Federal loan guarantee to the Applicant for the Project, which would involve the construction of a new natural gas generation facility and a new 1-mile transmission interconnection line. The natural gas generation facility and interconnection transmission line would be constructed within IPL property (zoned as General Industrial) just north of IPL's existing Marshalltown Generation Station (2115 E. Nevada Street). The natural gas generation facility would require an access road, stormwater detention basin, and new city tie-ins for potable water, wastewater, and sanitary water. The natural gas generation facility would have three approximately 180-foot-high

smokestacks; all proposed aboveground Project elements, including the interconnection transmission line, will be lower than 200-feet in height. The interconnection transmission line would consist of ten (10) new steel poles supporting a double-circuited 345 kilovolt transmission line that would tie into the existing Twinkle Substation. Project construction would disturb a total of 66.5 acres, which includes the 19.5-acre natural gas generation facility footprint, a 5-acre electrical transmission line corridor, 38-acres of temporary laydown and construction facilities areas, and 4 acres of spoils stockpile that will be stabilized and remain upon completion of the natural gas generation facility for maintenance convenience and use later as needed onsite. The 38 acres of temporary construction laydown areas will be restored upon construction completion. The Project site is generally disturbed and was used in the recent past for agricultural crops. The projected construction schedule starts in 2026 and extends through 2029.

In addition to the Project, the undertaking also includes construction of an approximately 12-mile-long natural gas pipeline which is necessary for the Project to function. This new pipeline will be built by IPL but will not be funded by DOE EDF. The pipeline will be collocated with an existing pipeline Right-of-way (ROW) corridor, and construction will commence after construction starts for the Project (the natural gas generating facility and interconnection line).

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 areas collectively comprise the APE for the Project.

The Project’s archaeological survey area includes the proposed Project construction footprint consisting of the natural gas generation facility, interconnection line, and adjacent areas for civil preparation of the Project site, totaling 66.5 acres. The Project’s architectural survey area includes 66.5-acre Project site and the area within a 0.25-mile buffer surrounding the Project. The portion of the APE comprising the pipeline includes an approximately 12-mile-long and 200-foot-wide ROW corridor collocated with an existing pipeline ROW.

Level of Effort

While DOE EDF has Section 106 authority over its own actions, including the current Project, DOE EDF cannot exert influence or authority over activities or projects that are not subject to its approvals or funding. Because the new pipeline lacks independent utility from the Project, DOE EDF must also consider the potential effects of the pipeline on historic properties as part of this Section 106 review; however, the pipeline is not included in IPL's application for a DOE EDF Federal loan guarantee, and there is currently no other Federal nexus triggering Section 106 review of the pipeline. In consideration of the absence of DOE EDF or other Federal involvement in the pipeline, as well as known information on historic properties in the APE, the reduced probability of intact significant archaeological historic properties to be preserved in a collocated pipeline ROW, and the undertaking's potential to affect historic properties, DOE EDF has coordinated with the SHPO, the Applicant, and the Advisory Council on Historic Preservation (ACHP) to vary the level of effort for the identification of historic properties across the two aspects of the undertaking (i.e., the Project site and the pipeline), in accordance with 36 CFR 800.4(b)(1), as follows:

1. The Project to be funded by DOE EDF is subject to field identification surveys. The Project site has previously undergone a Phase I archaeological field survey that has been reviewed and approved by SHPO, and the Applicant has conducted an architectural reconnaissance survey for the current Project (Attachment 1).
2. The gas pipeline that will not be funded by DOE EDF is subject to a desktop-level review and records search to identify known cultural resources and historic properties (Attachment 2).

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 seventeen (17) federally recognized Tribes to see if they have an interest in the Project:

1. Apache Tribe of Oklahoma
2. Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation, Montana
3. Cheyenne River Sioux Tribe of the Cheyenne River Reservation, South Dakota
4. Iowa Tribe of Kansas and Nebraska
5. Iowa Tribe of Oklahoma
6. Lower Brule Sioux Tribe of the Lower Brule Reservation, South Dakota
7. Menominee Indian Tribe of Wisconsin
8. Oglala Sioux Tribe
9. Prairie Island Indian Community in the State of Minnesota
10. Rosebud Sioux Tribe of the Rosebud Indian Reservation, South Dakota
11. Sac & Fox Nation of Missouri in Kansas and Nebraska

12. Sac & Fox Nation, Oklahoma
13. Sac & Fox Tribe of the Mississippi in Iowa
14. Shakopee Mdewakanton Sioux Community of Minnesota
15. Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota
16. Standing Rock Sioux Tribe of North & South Dakota
17. Yankton Sioux Tribe of South Dakota

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.

Archaeological Resources – Previously Surveyed

The Project site had been previously surveyed for archaeological resources in 2008. The report of those investigations was reviewed and approved by the Iowa SHPO at that time. The 2008 survey (SHPO R&C Number 070400050) identified nine newly recorded sites within the archaeological survey area. Sites 13MR419—13MR427 were recommended as not eligible for inclusion in the National Register of Historic Places (NRHP).

During a July 17, 2025, coordination meeting, DOE EDF and SHPO agreed that the previously applied survey methodology, previous survey coverage, and previous eligibility determinations are sufficient for the current Project and no new archaeological field surveys are warranted to complete the current Section 106 review for the Project, and that a Project-specific Unanticipated Discoveries Plan should be implemented during construction. A summary of this coordination meeting that provides a map depicting the previous survey coverage of the Project site and the Unanticipated Discoveries Plan is included as Attachment 3.

Historic Architectural Resources – Reconnaissance Survey

As part of the Section 106 identification process, the Applicant contracted with Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) to conduct a new historic architectural reconnaissance survey for the Project. Burns & McDonnell prepared the architectural history report that is summarized below and included as Attachment 1. The report includes the historic context of the Project area, literature search results, survey methods and results of the field survey, with NRHP eligibility recommendations for each identified resource.

Prior to field surveys, Burns & McDonnell conducted a background review to identify previously recorded historic-age architectural resources within a 1-mile-radius study area surrounding the Project. Burns & McDonnell historians consulted data available through

the Iowa Site File (I-Sites) web-based database for previously recorded historic-age properties (buildings, structures, sites, objects, and districts) that have been listed in the NRHP, determined eligible for NRHP listing, or surveyed without an NRHP eligibility determination. Additional archival sources consulted during the background review include the Iowa Historic Architectural Database (HADB), Iowa Historic Property Inventory Database (IHPID), historic plat and land ownership maps, historic topographic maps and aerial photography, online secondary sources and cemetery inventory records, relevant NRHP nominations and bulletins, and contexts and evaluation methodologies relevant to Midwestern agricultural buildings and properties. The background review did not identify any historic properties or districts previously determined eligible for or listed in the NRHP in the APE or the 1-mile-radius study area. There are 57 previously surveyed aboveground resources in the 1-mile-radius study area with undetermined NRHP eligibility; four (4) of these resources are within the APE. Only one (1) of these previously recorded resources within the APE was found to be extant during the field survey. Lastly, no cemeteries were identified in the APE.

The field survey documented all resources 45 years of age or older within the APE. A 45-year threshold was used in accordance with established Iowa SHPO survey standards and to account for potential Project delays. All resources within the APE were photo-documented from the public ROW and their locations recorded. The consultant's NRHP eligibility assessments were based on the Secretary of the Interior's standards for identification and evaluation of historic resources, including the criterion for assessment of resources' integrity and significance with regard to design or association with recognized historic contexts or significant individuals. The historian also evaluated the presence of historic agricultural or residential districts in the APE; no such districts were identified during the survey effort.

A total of four (4) resources were documented within the APE, consisting of a total of eight (8) structures 45 years old or older. The surveyed resources include residences or manufactured mobile homes with associated ancillary buildings such as garages or sheds. Each resource was examined for its age, historic significance, and historic integrity, and all four (4) resources are recommended not eligible for inclusion in the NRHP.

Individual resource descriptions, photographs, and maps are provided in the survey report included as Attachment 1.

Gas Pipeline – Desktop Review / Records Search

As mentioned above, the portion of the APE for the gas pipeline includes a 200-foot-wide pipeline corridor collocated with an existing pipeline ROW. A desktop survey to identify known, previously recorded cultural resources and historic properties within this portion of the APE was conducted by the Applicant's consultant, Burns & McDonnell. The desktop study is summarized below and the report is included as Attachment 2.

Geospatial data regarding the locations of archaeological sites, aboveground historic buildings and structures, and cemeteries were obtained from the I-Sites Pro geospatial

database maintained by the Iowa Office of the State Archaeologist, as was information regarding the locations of previous archaeological surveys. Additional online resources included the Iowa Historic Property Inventory Database, the National Historic Landmark list, and the National Register of Historic Places (NRHP) online database. Burns & McDonnell used these sources to identify previously recorded cultural and historic resources within a 1-mile-radius study area surrounding the pipeline route.

A total of 29 previously recorded archaeological sites were identified within the 1-mile-radius study area. None of these sites are listed on the NRHP and none are located within the indirect effects study area portion of the APE. A total of 34 previously recorded above-ground historic resources are located in the 1-mile-radius study area. None of these 34 sites are located within the indirect effects study area portion of the APE. No NRHP-listed historic architectural resources or other above-ground historic sites are reported in the 1-mile-radius study area. Likewise, no known historic districts and no National Historic Landmarks are located within the 1-mile-radius study area. Lastly, two cemeteries were identified within the 1-mile-radius study area, neither of which are within the APE.

In summary, no historic properties are present within the APE.

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 Iowa SHPO on the APE and the Finding of No Historic Properties Affected, as well as any comments you may have on 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, the Applicant will implement the procedures in the Project Unanticipated Discovery Plan (see Attachment 3) and, as applicable, will notify DOE EDF, the SHPO, and any Tribe that might attach religious and cultural significance to the affected property within 48 hours of the discovery, and will determine actions to resolve adverse effects.

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 David Johnson via email at david.johnson3@hq.doe.gov or EDF_Environmental@doe.gov.

Sincerely,

Todd Stribley
Director, Environmental Programs
Office of Energy Dominance Financing

Attachments:

Attachment 1. Historic Architectural Resources Survey of the Project

Attachment 2. Desktop Survey of the Pipeline

Attachment 3. Summary Memo of Pre-Survey Coordination Meeting and Project
Unanticipated Discoveries Plan