



Department of Energy

Washington, DC 20585

September 10, 2026

Tricia Canaday
State Historic Preservation Officer
Wisconsin Historical Society
816 State Street
Madison, WI 53706

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Wisconsin Power and Light Company, Rock County Liquefied Natural Gas Facility Project, Rock County, Wisconsin

Dear Ms. Canaday,

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 Wisconsin Power and Light Company (WPL, or the Applicant) for the Rock County Liquefied Natural Gas (LNG) Facility Project (the Project) located in Rock County, Wisconsin.

The purpose of this letter is to formally initiate consultation with the Wisconsin 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.

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 is a proposed natural gas liquefaction, storage, and regasification project developed by WPL to enhance the reliability, resiliency, and operational flexibility of the regional natural gas system.

The Project consists of three primary components:

1. LNG Storage System, which includes
 - Full-containment LNG storage tank (~25 million gallons of storage capacity)

- Natural gas pretreatment systems
 - A nitrogen-cycle liquefaction system capable of producing approximately 20 million standard cubic feet per day (MMscfd) of LNG
 - Vaporizers and send-out pumps capable of returning up to 200 million MMscfd of natural gas to the distribution system
 - Boil-off gas compression and management systems
 - Control and maintenance building
 - Fire protection infrastructure
 - Two stormwater detention ponds
 - Access roads to and around the LNG Storage System
 - Potable water well
 - Perimeter fence
 - City sewer connection from control and maintenance building to City of Beloit sewer line along West B.R. Townline Road
 - Two fiber connections to tie the LNG Storage System to the existing fiber network along West B.R. Townline Road
2. An electrical substation that connects the LNG Storage System to the existing electrical grid. The substation will include an approximate 1,500 feet underground tie-in line to the LNG Storage System. The substation will connect to the existing electrical grid via a 300-500 feet overhead line on the eastern side of the parcel.
 3. An LNG pipeline (~0.5 mile) that connects the LNG Storage System to WPL's existing gas infrastructure.

All of these components collectively comprise the Project and are anticipated to be included within the proposed DOE EDF financing action.

The LNG Storage System, electrical substation and interconnection tie-lines, and a portion of the pipeline will be located on a 130-acre parcel on the north side of West B.R. Townline Road between South Duggan Road and the CMSTP&T Railroad in the Towns of Rock and Beloit, Rock County, Wisconsin. The parcel is agricultural land used for row crop production and is adjacent to existing WPL electric generation facilities. Outside of this parcel, the remaining section of the pipeline would be sited in existing road right-of-way.

The Project's permanent construction footprint includes approximately 19 acres for the LNG Storage System, approximately 5 acres for the substation and electrical infrastructure, and approximately 7 acres associated with the permanent natural gas corridor. Temporary construction impacts will total approximately 33 acres and include construction workspaces, material laydown areas, equipment staging areas, and temporary access routes. Thus, the Project's construction footprint includes a total of 64 acres. The LNG Storage System will be secured by a perimeter security fence (encompassing 40 acres), with additional internal security fencing around critical process areas. Portions of the 40-acre fenced area will remain undisturbed and function as safety setbacks, security buffers, and potential future expansion areas. Construction is anticipated to begin in November 2026. Project maps are included in 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 ground disturbance would occur, totaling approximately 64 acres. The Project’s architectural survey area includes the area within the Project LOD and area within a 0.5-mile radius of the Project.

The cultural resource reports included as Attachments 1 and 2 provide maps of the APE. DOE EDF notes that a broader 82-acre area was surveyed within which the 64-acre Project LOD will be located.

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 twelve (12) federally recognized Tribes to see if they have an interest in the Project:

1. Citizen Potawatomi Nation, Oklahoma
2. Forest County Potawatomi Community, Wisconsin
3. Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
4. Ho-Chunk Nation of Wisconsin
5. Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan
6. Little Traverse Bay Bands of Odawa Indians, Michigan
7. Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan
8. Menominee Indian Tribe of Wisconsin
9. Miami Tribe of Oklahoma
10. The Osage Nation
11. Prairie Band Potawatomi Nation
12. Winnebago Tribe of Nebraska

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 HDR Engineering, Inc. (HDR) to conduct cultural resource surveys. HDR prepared the cultural resources reports that are summarized below and included as Attachments 1 and 2.

A literature review for the Project was completed as part of an environmental technical memorandum for the Project on November 10, 2023, and submitted as part of WPL's submission to the Public Service Commission of Wisconsin (REF# 537684). The technical memorandum is included as Appendix C of Attachment 1. Additionally, the literature review was updated in July and August 2026 using the Wisconsin Historic Preservation Database (WHPD). The results of the records search are summarized below.

HDR reviewed the WHPD and the National Register of Historic Places (NRHP) GIS Public Dataset to identify previous archaeological surveys, archaeological sites, historical architectural resources, and NRHP eligible or listed historic properties located within a 1-mile radius of the Project. Seven (7) previous cultural resource surveys were identified within the 1-mile search radius, one (1) of which partially overlaps the APE. Eighteen (18) previously recorded archaeological sites are located within the 1-mile search radius, none of which are within the APE. Five (5) previously recorded WHPD Architecture History Inventory (AHI) resources were identified in the 1-mile search radius, four (4) of which are mapped within the APE but two (2) of which no longer appear to be extant. No NRHP-eligible or listed historic properties are located within the 1-mile search radius.

Following the completion of background research, HDR completed Phase I cultural resources field surveys to identify newly recorded archaeological sites and historic aboveground resources within the APE. The results of the surveys are summarized below and provided in Attachments 1 and 2.

Archaeological Resources

The archaeological field investigations consisted of pedestrian reconnaissance of the archaeological survey area employing visual inspection of the ground surface and subsurface testing where conditions allowed, following SHPO survey guidelines. Photographic documentation was utilized to provide evidence of the field conditions and disposition of the survey area.

At the time of the field survey, ground surface visibility was between 30-50 percent in the wheat field portions and 70-80 percent visibility in the soy field portions. To supplement the pedestrian reconnaissance, subsurface shovel tests were judgmentally placed to investigate historic artifact scatters and landforms with higher archaeological site potential. In total, 15 shovel tests were excavated to a depth of 50-70 centimeters below surface or until impassable obstructions or culturally sterile subsoils were encountered. Shovel tests bracketing any tests positive for artifacts were attempted at 5-meter and 10-meter intervals in each cardinal direction. Shovel testing identified consistent plow zone activity for the uppermost 30 centimeters of topsoil. All observed historic-period artifacts were found on the surface or within the plow zone. No buried archaeological features nor any stratified deposits with cultural material were identified during the shovel testing. None of the observed historic-period artifacts overlapped with a former structure location. All former structure locations lacked intact remnants of foundations or exhibited conditions that prevented shovel testing. In accordance with Wisconsin archaeological guidelines, “areas of very widely scattered historic materials, with no archival or archaeological evidence of structures or focused activity areas, are generally not considered sites.” Without evidence of any intact archaeological deposits or discrete functional areas, the historic-period artifacts were deemed incidental; no archaeological sites were identified within the APE.

HDR conducted additional photographic documentation of the APE related to the proposed pipeline connection located south of WBR Townline Road. The entire area south of WBR Townline Road was confirmed to have been disturbed by previous development, bulldozing, and construction (see Attachment 1, Appendix A). Prior to recent disturbance, this area was previously subjected to Phase I archeological survey, which was negative for archaeological resources. Additional details on the archaeological survey methods and results, maps, photographs, and shovel test logs are provided in Attachment 1.

Historic Architectural Resources

The historic architectural survey included photographic documentation of above-ground resources in the APE that met the minimum 50-year threshold for NRHP consideration. A total of eight (8) historic architectural resources were identified within the APE. Two (2) previously inventoried resources within the APE were found to be no longer extant and were not resurveyed. Two (2) additional previously inventoried resources within the APE were found to not retain sufficient integrity and were not resurveyed. Five (5) newly inventoried resources were identified and documented during the field survey. These five (5) properties were found to not retain sufficient integrity or have significant architectural distinction; thus, none of the identified historic architectural resources within the APE are recommended as eligible for inclusion in the NRHP. Additionally, a portion of the Chicago, Milwaukee, St. Paul & Pacific Railroad corridor that crosses the APE was not inventoried in accordance with technical assistance coordination between HDR and SHPO staff. Additional details, maps, and photographs are included in Attachment 2.

In conclusion, 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 Wisconsin 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. Architectural History Survey Report