

**Record of Categorical Exclusion for
American Electric Power's (AEP's)
West Mount Vernon -Mount Vernon 69kV & Pittsburgh Avenue Extension Project
(AEP Project #6)**

Description of Categorically Excluded Action

The United States Department of Energy (DOE) Title XVII Energy Infrastructure Reinvestment (EIR 1706) Program was established pursuant to the Inflation Reduction Act of 2022, which amended Title XVII of the Energy Policy Act of 2005 to include the EIR Program. The EIR Program provides loan guarantees for projects that either: (1) retool, repower, repurpose, or replace energy infrastructure that has ceased operations; provided that if the project involves electricity generation through the use of fossil fuels, it is required to have controls or technologies to avoid, reduce, utilize, or sequester air pollutants and anthropogenic emissions of greenhouse gases; or (2) projects that enable operating energy infrastructure to avoid, reduce, utilize, or sequester air pollutants or anthropogenic emissions of greenhouse gases.

The DOE Loan Programs Office (LPO) is considering whether to issue a loan guarantee of a funding facility to American Electric Power (AEP, or the Applicant) pursuant to its authority under the EIR 1706 Program. In its application, AEP has identified Project 6, the West Mount Vernon-Mount Vernon 69kV & Pittsburgh Avenue Extension Project (Project) for inclusion in the funding facility that is the subject of DOE's loan guarantee (the Proposed Action). AEP may request inclusion of multiple individual projects with independent utility in the funding facility that is the subject of the DOE loan guarantee; accordingly, DOE will complete an environmental review pursuant to the National Environmental Policy Act (NEPA) for these projects prior to their inclusion in the funding facility that is the subject of DOE's loan guarantee.

Project Description

The Project, which involves rebuilding and extending select transmission lines in Knox County, Ohio, spans approximately three miles in a developed setting. The Project includes the corridor for the proposed rebuilding of an existing transmission line, as well as the corridor for proposed extensions to the North Mount Vernon Station. The southwestern terminus of the Project is at the West Mount Vernon Station, while the northeastern terminus is at the Mount Vernon Station. The Project would generally remove wooden monopoles approximately 65 feet tall on average and replace them with steel monopoles approximately 85 feet tall on average, and conductors. Most of the Project would occur in the existing approximately 50-foot-wide rights-of-way with slight deviations to a 60-foot-wide right-of-way. Approximately 0.21 miles of the Project would occur in a new approximately 60-foot-wide right-of-way needed due to space constraints in the existing right-of-way for the north extension. Construction activities consistent with transmission lines typically include erosion and sediment control, temporary access roads, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, and restoration once construction is completed. Tree clearing will be needed for approximately 1.7 acres for the main installation right-of-way and for approximately 0.16 acres for the combined right-of-way areas for the north and south extensions.

LPO's review of the Project in accordance with the Endangered Species Act determined that the Project "may affect, is not likely to adversely affect" the endangered Indiana and northern long-eared bats and the proposed endangered tricolored bat; the United States Fish and Wildlife Service concurred with these determinations. LPO's review of the Project found that there would be no effect to the other listed species in the Project area.

In accordance with the National Historic Preservation Act, LPO consulted with the Ohio State Historic Preservation Office (SHPO) and federally recognized Indian Tribes and Tribal Nations (Tribes) that may have an interest in the Project area. The Ohio SHPO concurred with LPO's finding of No Adverse Effect for this Project on January 18, 2025, and no Tribes expressed interest or concerns about the Project. In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE LPO 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).

Number and Title of Categorical Exclusion(s)

The Project is consistent with and covered by DOE categorical exclusions in 10 Code of Federal Regulations (CFR) 1021, Appendix B4, Categorical Exclusions Applicable to Electric Power and Transmission. Specifically, the Project is covered by DOE Categorical Exclusions B4.12, Construction of Powerlines, and B4.14 Upgrading and Rebuilding Existing Powerlines.

B4.12. Construction of Powerlines

Construction of electric powerlines approximately 10 miles in length or less, or approximately 20 miles in length or less within previously disturbed or developed powerline or pipeline rights-of-way.

B4.13 Upgrading and Rebuilding Existing Powerlines

Upgrading or rebuilding existing electric powerlines, which may involve relocations of small segments of the powerlines within an existing powerline right-of-way or within otherwise previously disturbed or developed lands (as discussed at 10 CFR 1021.410(g)(1)). Upgrading or rebuilding existing electric powerlines also may involve widening an existing powerline right-of-way to meet current electrical standards if the widening remains within previously disturbed or developed lands and only extends into a small area beyond such as lands as needed to comply with applicable electrical standards. Covered actions would be in accordance with applicable requirements, including the integral elements listed at the start of appendix B of this part; and would incorporate appropriate design and construction standards, control technologies, and best management practices. This exclusion does not apply to underwater powerlines. As used in this categorical exclusion, "small" has the meaning discussed at 10 CFR 1021.410(g)(2).

Per 10 CFR §1021.410 Application of categorical exclusions (classes of actions that normally do not require EAs or EISs), the following clarifications are provided to assist in the appropriate application of categorical exclusions that employ the terms or phrases "previously disturbed or developed" and "small" or "small-scale":

- (1) "Previously disturbed or developed" refers to land that has been changed such that its functioning ecological processes have been and remain altered by human activity. The phrase encompasses areas that have been transformed from natural cover to nonnative species or a managed state, including, but not limited to, utility and electric power transmission corridors and rights-of-way, and other areas where active utilities and currently used roads are readily available.*
- (2) DOE considers terms such as "small" and "small-scale" in the context of the particular proposal, including its proposed location. In assessing whether a proposed action is small, in addition to the actual magnitude of the proposal, DOE considers factors such as industry norms,*

the relationship of the proposed action to similar types of development in the vicinity of the proposed action, and expected outputs of emissions or waste. When considering the physical size of a proposed facility, for example, DOE would review the surrounding land uses, the scale of the proposed facility relative to existing development, and the capacity of existing roads and other infrastructure to support the proposed action.

Regulatory Requirements Defined in 10 CFR § 1021.410 (b):

The proposed loan guarantee for actions described above was subjected to an environmental due diligence review by DOE LPO staff to ensure consistency with the specific category of action (categorical exclusion) contained in Appendix B of 10 CFR Part 1021 and the conditions for applying categorical exclusions specified in Section 410 of Part 1021. To ensure that the requirements of Appendix B were met, LPO Environmental Compliance (EC) staff reviewed numerous project-related documents obtained between August 2024 and February 2025 and participated in several conference calls with AEP staff to ensure a complete understanding of the activities associated with the Project.

The environmental due diligence review determined that there is no controversy regarding the potential environmental impacts of the Project, and that the actions associated with the loan guarantee would not adversely affect any physical, biological, or socio-cultural resources associated with the deployment of the project. The environmental due diligence review determined the Proposed Action has not been segmented to meet the definition of a categorical exclusion.

The Comment section below is provided for any necessary clarifications concerning the findings listed above. Signature by AEP's designated representative in the Corporate Validation section is an indication of AEP's concurrence with the findings and determinations presented above.

Comment(s)

Corporate Validation

Name and Title (Print):

Jonathan Dormo

Signature and Date:

Signed by:

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Determination

Based on my review of information conveyed to me and in my possession concerning the actions associated with the proposed EIR Program (EIR 1706) loan guarantee described above, as NEPA Compliance Officer (as prescribed in DOE Policy Directive 451.1), I have determined that the actions involve no extraordinary circumstances and fit within the specified category of actions in Appendix B of 10 CFR Part 1021 described above, and are hereby categorically excluded from further review under NEPA (42 United States Code 4321, as amended).

DOE will complete a review of any future projects in accordance with NEPA prior to their inclusion in the funding facility that is the subject of the DOE loan guarantee.

Signature and Date

Todd Stribley
NEPA Compliance Officer
DOE Loan Programs Office