

**Record of Categorical Exclusion for  
American Electric Power's (AEP's)  
Kalida-Ottoville 69-kV Transmission Line  
(AEP Project #5a)**

**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 5a, the Kalida-Ottoville 69-kV Transmission Line 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 is located in Jackson and Union Townships, Putnam County, Ohio, and involves rebuilding approximately 8.3 miles of existing linear transmission infrastructure. The Project area is flat in elevation and dominated by cultivated crop lands with occasional residential development. Rebuilding approximately 8.3 miles of existing linear transmission infrastructure will be in the existing maintained corridor with some minor deviations from the centerline. Minor deviations are required to avoid residential buildings, minimize wetland impacts, and ensure AEP's horizontal distances are maintained from any buildings or structures encroaching on the existing right-of-way. There are three areas of deviations which result in less than a mile of new right-of-way in previously disturbed areas. A total of 206 existing transmission structures will be removed and replaced with 169 structures. Thirty-seven fewer structures are needed to rebuild the line, therefore reducing the overall disturbance and impacts during construction. All existing facilities, generally 45-foot-tall wood poles, will be removed from the right-of-way and replaced with new structures, generally 85-foot-tall steel pole structures, and conductors. Existing roads and/or temporary access roads will be used for construction. 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 post-construction restoration activities. Any work that extends outside of the right-of-way will be temporary and in previously disturbed areas. Tree clearing will be conducted in accordance with applicable United States Fish & Wildlife Service (USFWS) tree clearing window and will be needed on approximately 0.30 acres within the 50.80-acre right-of-way.

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 bat and endangered northern long-eared bat. The USFWS concurred with the northern long-eared bat determination on January 21, 2025, through the USFWS' Information for Planning and Consultation (IPaC) website using the northern long-eared bat Dkey, and concurred with the Indiana bat determination on March 24, 2025. These concurrences are based on AEP's commitment to limit tree clearing only between October 1 to March 1. DOE also concluded that the Project is "not likely to jeopardize the continued existence" of the proposed endangered

monarch butterfly, which does not require LPO to conduct a conference with the USFWS.

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 April 2, 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 being notified 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 Exclusion B4.14 Upgrading and Rebuilding Existing Powerlines.

#### ***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 Division (ECD) staff numerous project-related documents obtained between February 7, 2025, and April 3, 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)**

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**Corporate Validation**

Name and Title (Print):

Shawn Robinson

Signature and Date:

Signed by:  
*Shawn Robinson*  
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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**

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Todd Stribley  
NEPA Compliance Officer  
DOE Loan Programs Office