

**Record of Categorical Exclusion for
American Electric Power's (AEP's)
Cornville to Norge Road 138 kV Transmission Line Rebuild Project
(AEP Project #9)**

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 (42 U.S.C. 16517), 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 (42 U.S.C. 16517(a)(2)).

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 the Cornville to Norge Road 138 kV transmission line rebuild, 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 will rebuild approximately 4.9 miles of existing linear transmission line infrastructure within its existing 100-foot-wide right-of-way (ROW) between the existing Cornville Substation and Norge Substation in Chickasha, Oklahoma (Grady County). There will be no deviations from the existing ROW. Proposed construction activities include removing 46 existing 70-foot-tall wooden H-frame (two poles with cross bracing) transmission line structures and replacing them with 44 new single steel poles and upgrading the wires and substation equipment to improve electrical reliability for area customers. The new steel poles are approximately 90 feet tall and the spans between them are approximately 600 feet. The majority of the rebuild is immediately adjacent to and parallels the north side of Country Club Road, with the western 3 miles passing through primarily commercial and residential areas, and the remaining 1.9 miles passing through agricultural/cultivated crop lands. Near the extreme eastern end of the Project, the rebuild crosses the Washita River. AEP plans to access the Project from existing roads, and no new permanent roads are proposed. A small distance of temporary access road (0.51 mile) will be needed during construction and will be sited on previously disturbed land. Five temporary pull areas within and immediately adjacent to the existing ROW will also be needed during construction; these areas will be located on previously disturbed land. In addition, approximately two acres of trees would be trimmed or removed in the existing ROW. AEP's clearing and maintenance of transmission line ROWs occurs on a 5-year (and sometimes 10 year) rotation, which results in trees growing back or encroaching into the existing ROW. The tree trimming and removal in the existing ROW is conducted to meet reliability standards (i.e., to prevent power outages from tree contact) and for prevention of fire and safety hazards. Other construction activities consistent with transmissions line rebuilds include erosion and sediment control, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, and restoration once construction is completed.

In accordance with the Endangered Species Act, LPO's review of the Project found that there would be *no effect* to Federally threatened, endangered, proposed, and candidate species or to designated critical habitat. The Project site is an existing and maintained ROW that contains no suitable habitat or sensitive biological resources, and there will be no disturbance from construction or operation activities on federally listed threatened and endangered species or designated critical habitat.

In accordance with the National Historic Preservation Act, LPO consulted with the Oklahoma State Historic Preservation Office (SHPO) and Oklahoma Archaeological Survey (OAS). The Oklahoma SHPO and OAS concurred with LPO's finding of no historic properties affected for this Project on June 23, 2025, and June 26, 2025, respectively. DOE identified and contacted eight (8) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Apache Tribe of Oklahoma, Cheyenne and Arapaho Tribes, Chickasaw Nation, Comanche Nation, Kiowa Indian Tribe of Oklahoma, Osage Nation, Quapaw Nation, and Wichita and Affiliated Tribes. On June 6, 2025, the Chickasaw Nation responded that they have no comments or concerns with the Project. On June 9, 2025, the Quapaw Nation responded that they have no comments or concerns with 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).

In accordance with 10 CFR 1022, Compliance with Floodplain and Wetland Review Requirements, and Executive Order 11988, Floodplain Management, this CX provides a statement of findings, as required in Section 1022.14. A project description and information regarding the location are provided above in the Project Description section of this CX. Approximately eight of the 44 existing wooden H-frame structures are located in Federal Emergency Management Agency (FEMA)-mapped 100-year floodplain (base floodplain) and would be removed and replaced with eight new steel poles in generally the same location. No fill material would be placed within 100-year floodplain and no part of the Project would result in a change to floodplain elevation. In addition, the City of Chickasaw's floodplain administrator confirmed that no floodplain permits are needed for the Project. Therefore, there would be no adverse floodplain impact, and the Project would conform to the applicable floodplain standards.

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) Part 1021, Appendix B4, Categorical Exclusions Applicable to Electric Power and Transmission. The Project is covered by DOE Categorical Exclusions B4.13, 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 Action and related Project activities described above were subjected to an environmental due diligence review by DOE LPO staff to ensure they are consistent with the specific category of actions (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 the requirements of Appendix B were met, LPO staff reviewed numerous project-related documents obtained between October 2024 and June 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):

Chris Ashley Environmental Manager

Signature and Date:

DocuSigned by:
Chris Ashley
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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
Loan Programs Office