



U.S. Department of Energy

Categorical Exclusion Determination Form

<u>Categorical Exclusion Number:</u>	CX-270845
<u>Loan Application Number:</u>	EIR0037
<u>Proposed Action Title:</u>	American Electric Power's (AEP) Lawton Eastside to Southwestern Station 138 kV Transmission Line Rebuild Project (AEP Project #10)
<u>Program of Field Office:</u>	Loan Programs Office (LPO)
<u>Location(s) (City/County/State):</u>	Caddo and Comanche counties, Oklahoma

Proposed Action Description:

The Project, as proposed by the Applicant, encompasses rebuilding approximately 36 miles of existing linear transmission line infrastructure generally within its 100-foot-wide right-of-way (ROW) between the existing Southwestern Station and Lawton Eastside Station, in Caddo and Comanche counties, Oklahoma. There are four minor deviations (i.e., a shift in more than 10 feet from existing centerline) from the existing ROW (totaling 1.5 miles) to avoid buildings, accommodate a new configuration at a small substation, and to avoid new ROW acquisition of Bureau Indian Affairs (BIA) land. The new ROW for the 1.5 miles of deviation (a net increase of 2 acres) is in previously disturbed areas. Proposed construction activities include removing 318 existing 70-foot-tall wooden H-frame (two poles with cross bracing) transmission line structures and replacing them with 318 new single steel poles and upgrading the wires to improve electrical reliability for area customers. The new steel poles are approximately 85 feet tall. The transmission line runs generally in a north-south direction.

The majority (approximately 75 percent) of the rebuild passes through agricultural lands (pasture/hay and cultivated crops). The remaining roughly 25 percent of the rebuild passes through a variety of land cover types including grassland/herbaceous and deciduous forest, developed high intensity, developed low intensity, developed open space, emergent herbaceous wetlands, mixed forest, and shrub/scrub areas. The broader area surrounding the Project is dominated by agricultural lands with some scattered wooded/shrub areas that typically exist as riparian areas along small streams. The Project proposes or introduces no new fragmentation of ecological processes not already altered by human activity.

Approximately 3.74 miles of existing roads and temporary access roads will be used for construction, including existing access roads within and outside of the existing ROW. Approximately 1.12 miles of temporary access roads will be needed outside of the ROW. The development of the temporary access roads typically consists of laying down temporary construction matting in previously disturbed areas. Approximately 0.08 acre of access roads will include temporary matting in two wetlands (the Project does not require any permanent fill in any surface water or wetland areas). Approximately 30 temporary pull pads (to string conductors on poles) will be sited within the existing ROW, with 8 of these pull pads requiring some area beyond and adjacent to the existing ROW; these pull pads will be located on previously disturbed land. In addition, approximately 0.61 acres of trees would be trimmed or removed for slight deviations in the centerline (<10 feet), one of the four aforementioned deviations (>10 feet of centerline), and some off-ROW access. Most of the tree removal for off-ROW access will occur on a small man-made pond dam that has been unmaintained/overgrown; it is not connected to larger quality habitat areas and is surrounded by agricultural lands. The general construction process would entail erosion and sediment control installation, crane pad grading, foundation installation, structure assembly and erection, conductor/wire installation, and restoration once construction is completed.

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 whooping crane, threatened piping plover and rufa red knot, as well as the proposed endangered tricolored bat and proposed threatened monarch butterfly. The USFWS concurred with these determinations on September 30, 2025. As part of this concurrence, AEP will install bird diverters along a portion of the transmission line and will trim/remove trees during the bat inactive season (16 November to 14 March). If the proposed monarch butterfly is formally listed as threatened or endangered during project construction, AEP has agreed to avoid any milkweed plants between the months of May and October if the plants have monarch butterfly eggs, caterpillars, or chrysalis.



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In accordance with the National Historic Preservation Act, LPO consulted with the Oklahoma State Historic Preservation Office (SHPO) and the Oklahoma Archaeological Survey (OAS). The Oklahoma SHPO and OAS concurred with LPO's finding of no adverse effect on historic properties for this Project on July 14, 2025, and July 16, 2025, respectively. LPO identified and contacted ten (10) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Apache Tribe of Oklahoma, Caddo Nation of Oklahoma, Cheyenne and Arapaho Tribes, Comanche Nation, Delaware Nation, Fort Sill Apache Tribe of Oklahoma, Kiowa Indian Tribe of Oklahoma, Osage Nation, Quapaw Nation, and Wichita and Affiliated Tribes. On July 18, 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, 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).

The Project crosses lands managed by the Bureau of Indian Affairs, Department of Army (Fort Sill managed parcel), and the Natural Resources Conservation Service. LPO coordinated with these federal agencies and no further coordination was necessary, as no approvals or modifications to existing authorizations are required. The Project also crosses lands managed by the Oklahoma Commissioner of the Land Office (CLO). AEP is currently coordinating with CLO, and CLO anticipates the coordination and issuance of approval will be concluded within four weeks of issuance of this CX. AEP will not conduct any construction on the CLO land until CLO issues their approval.

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. Twenty-three of the 318 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 twenty-six new steel poles, for a net gain of three new poles in 100-year floodplain (all three in Caddo County). Most of the poles would be replaced in generally the same location they were removed. While small concrete footings will be installed to support the new steel poles, no fill material would be placed within 100-year floodplain and no part of the Project would result in a change to floodplain elevation. AEP coordinated with the Caddo County and Comanche County floodplain administrators to determine if authorizations were required for the Project in the 100-year floodplain. Caddo County did not require a floodplain permit. Comanche County did require a floodplain permit, which was issued on June 11, 2025, and stated that the Project is in conformance with Comanche County floodplain regulations. Therefore, there would be no adverse floodplain impact, and the Project would conform to the applicable floodplain standards.

Categorical Exclusion(s) Applied:

B4.13 - Upgrading and rebuilding existing powerlines

Choose an item.

Choose an item.

Choose an item.

Choose an item.

Categorical Exclusion(s) Description:

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



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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).

For the DOE procedures regarding categorical exclusions, including the full text of each categorical exclusion, see [10 CFR 1021.102](#) and Appendix B to 10 CFR Part 1021, and also Section 5.4 (Applying one or more categorical exclusions to a proposal) and Appendices B and C of [DOE's National Environmental Policy Act Implementing Procedures](#) (June 30, 2025).

Requirements and guidance in 10 CFR 1021.102 and DOE's NEPA Implementing Procedures: (See full text in regulation and in Implementing Procedures)

- ☒ The proposal fits within a class of actions that is listed in Appendix B to 10 CFR Part 1021 or Appendix B and C of DOE's NEPA Implementing Procedures (June 30, 2025).

To fit within the classes of actions listed in Appendix B to 10 CFR Part 1021, or Appendix B of DOE's NEPA Implementing Procedures, a proposal must satisfy the conditions that are integral elements of the classes of actions in Appendix B of both 10 CFR Part 1021 and DOE's NEPA Implementing Procedures.

- ☒ There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal. DOE or an applicant may modify the proposal to avoid reasonably foreseeable adverse significant effects such that the categorical exclusion would apply.

- ☒ The proposal has not been segmented to meet the definition of a categorical exclusion.

[Note: For proposals that fit within the categorical exclusions listed in Appendix C of DOE's NEPA Implementing Procedures, see DOE's notice of adoption for the subject Appendix C categorical exclusion for additional considerations. DOE notices of adoption for other agency categorical exclusions may be found on [DOE's Section 109 webpage](#).]

Based on my review of the proposed action, as NEPA Compliance Officer, I have determined that the proposed action fits within the specified class(es) of action, the other requirements and guidance set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

Corporate Validation:

Name and Title (Print):

Chris Long Env Director

Signature:

Chris Long

Date:

11/6/2025

NEPA Compliance Officer:

Name and Title (Print):

Todd Stribley
LPO NEPA Compliance Officer

Signature:

Date:

11/6/2025