



# U.S. Department of Energy

## Categorical Exclusion Determination Form

<u>Categorical Exclusion Number:</u>	CX-270854
<u>Loan Application Number:</u>	EIR0037
<u>Proposed Action Title:</u>	American Electric Power's (AEP) Philo to Ohio Central Install Transmission Line Rebuild Project
<u>Program of Field Office:</u>	Loan Programs Office (LPO)
<u>Location(s) (City/County/State):</u>	Muskingum County, Ohio
<u>Proposed Action Description:</u>	

The Project will rebuild approximately 17.9 miles of existing linear transmission line infrastructure within its existing 100-foot-wide right-of-way (ROW) between the existing Philo Station and Ohio Central Station, in Muskingum County, Ohio. The Project does not require any deviations from the existing ROW and the ROW area will remain unchanged (216.9 acres). Proposed construction activities include removing 86 existing 105-foot-tall steel lattice towers and replacing them with 87 new single steel poles and upgrading the wires to improve electrical reliability for area customers. The new steel poles are generally 100 feet tall.

Approximately 52 percent of the existing ROW consists of disturbed lands, including pasture/hay fields (26.4 percent), landscaped areas (7.6 percent), urban (6.3 percent), old field (6.1 percent), and agricultural row crops (5.5 percent); the remaining 48 percent of the ROW consists of scrub shrub (40 percent), wetlands/streams (6.9 percent), and woodland (1.2 percent). The broader landscape adjacent to and around the existing ROW consists of similar land uses and vegetation communities, but with a higher percentage of woodland areas. The existing ROW crosses the Muskingum River twice, as well as several tributaries to this river. The existing ROW also crosses Ohio Department of Natural Resources (ODNR) managed lands, including the Zanesville State Forest (0.4 mile), Tri-Valley Wildlife Area (0.9 mile), Powelson Wildlife Area (0.86 mile), and Muskingum River State Park (0.05 mile); AEP has obtained all authorizations from ODNR for these land crossings. No federal lands are crossed by the Project.

Approximately 19.85 miles of existing roads within and outside of the existing ROW will be used for construction access; no new permanent access is proposed for the Project. Existing access roads include public roads, driveways, parking lots, and other surfaces that do not typically require upgrades. Other existing access roads include old mining roads, farm roads, and ATV trails that consist of existing dirt, vegetation, and gravel paths through fields and forested areas and along field edges; these existing access routes may require upgrading/modification for safe construction access, such as grading (which could include slight widening), temporary placement of gravel, and tree trimming or removal along the edges. These upgrades/modifications are anticipated to be needed along approximately 10 miles of access roads outside of the existing ROW. In some instances, temporary timber matting will be used along access roads at a landowner's request or if sensitive resources are being crossed (e.g., wetlands). All timber matting will be removed at the end of Project construction, and disturbed areas will be restored to pre-existing conditions. Access roads that required upgrading/modifications would no longer be used by AEP upon construction completion; any necessary restoration activities, such as gravel removal and vegetation restoration, would be conducted upon construction completion. Upgrading/modifying existing access roads would result in no new fragmentation of ecological processes not already altered by human activity.

Temporary timber matting will be needed for access roads and/or work pads within 13 wetlands (2.18 acres), and permanent fill (<0.001 acre) is proposed for steel pole placement within two wetlands. A total of seven streams will be spanned using temporary bridges (i.e., no impacts below the ordinary high-water mark and no in-water work or fording) and two aerial conductor crossings over the Muskingum River will be replaced. Impacts related to the small area of permanent wetland fill and aerial crossings of Muskingum River are covered under Nationwide Permit 57, which satisfies Clean Water Act Section 404, Rivers and Harbors Act Section 10, and NEPA compliance. No other part of the Project would impact surface waters or wetlands.



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Numerous temporary work pads and pull pads are required along the Project to remove existing steel lattice towers and conductors and install new steel poles and string new conductors on poles. The vast majority of these work pads and pull pads are within the existing and disturbed ROW, with a few extending just beyond the existing ROW in previously disturbed areas. There will also be laydown and stockpile areas within previously disturbed areas. In addition, approximately 3.42 acres of trees would be trimmed or removed. Approximately 0.5 acre of this tree trimming/removal would occur within or immediately adjacent to the existing ROW. DOE LPO notes that 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 and adjacent to 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. The remaining tree trimming/removal (2.92 acres) would occur along the edges of existing access roads for safe construction access (see access road description above). AEP considers the 2.92 acres a conservative estimate (i.e., greater than what will actually occur during construction) due to using Geographic Information System (GIS) and the U.S. Geological Survey Woodland dataset for Ohio to generate the tree trimming/removal area. Trees would be replaced if requested by a landowner, otherwise AEP would restore with native seed mixes, where applicable, and natural revegetation of woody species would be allowed to occur. The general construction process would entail erosion and sediment control installation, access road work, crane pad grading, foundation installation, structure assembly and erection, conductor/wire installation, and restoration once construction is completed. Construction is anticipated to begin November 2025 and end in October 2027.

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 northern long-eared bat, proposed endangered tricolored bat, and proposed threatened monarch butterfly. The USFWS concurred with these determinations on November 25, 2025. As part of this concurrence, AEP has committed to cutting trees  $\geq 3$  inches diameter at breast height only during the bats' inactive season (1 October to 31 March in Ohio). LPO also determined the Project would have *no effect* on the endangered fanshell, sheepnose mussel, and snuffbox mussel; threatened longsolid, rabbitsfoot, and round hickorynut; and proposed endangered eastern hellbender. These are aquatic species, and the Project would not conduct any in-water work, and implementation of the Project's Stormwater Pollution Prevention Plan (as approved by the Project's National Pollutant Discharge Elimination Permit [NPDES] issued by Ohio EPA), would implement erosion and stormwater runoff measures to protect surface waters from contaminants and sediment deposition.

In accordance with the National Historic Preservation Act, LPO consulted with the Ohio State Historic Preservation Office (SHPO). The Ohio SHPO concurred with LPO's finding of no historic properties affected for this Project on October 13, 2025. LPO identified and contacted five (5) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Delaware Nation, Oklahoma; Delaware Tribe of Indians; Eastern Shawnee Tribe of Oklahoma; Miami Tribe of Oklahoma; and Seneca-Cayuga Nation. LPO received no responses from these tribes. 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).

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. Four of the 86 existing steel lattice towers are located in Federal Emergency Management Agency (FEMA)-mapped 100-year floodplain (base floodplain) and would be removed and replaced with four new steel poles, for no net change in structures in 100-year floodplain. The new steel poles would be replaced in generally the same location as the existing steel lattice towers. While small concrete footings will be installed to support the new steel poles, no permanent fill material would be placed within 100-year floodplain and no part of the Project would result in a change to floodplain elevation. Therefore, there would be no adverse floodplain impact. In addition, AEP coordinated with Muskingum County to determine if authorizations were required for the Project in the 100-year floodplain, and because the Project is considered a major utility facility permitted by



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the Ohio Power Siting Board under Section 4906 of the Ohio Revised Code, the Project is exempt from filing a floodplain development permit per Muskingum County's Special Purpose Flood Damage Resolution.

### 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 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.



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[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): Christopher Long - Environmental Director

Signature: Christopher Long

Date: November 25, 2025

### NEPA Compliance Officer:

Name and Title (Print): Todd Stribley  
LPO NEPA Compliance Officer

Signature:

Date: 12/1/2025