



U.S. Department of Energy Categorical Exclusion Determination Form

<u>Categorical Exclusion Number:</u>	CX-270905
<u>Loan Application Number:</u>	EIR0037
<u>Proposed Action Title:</u>	American Electric Power’s (AEP) East Lima to Columbus Grove Transmission Line Rebuild Project
<u>Program of Field Office:</u>	Office of Energy Dominance Financing (EDF)
<u>Location(s) (City/County/State):</u>	Allen County, Ohio

Proposed Action Description:

Description of Categorically Excluded Action

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) may provide loan guarantees for energy infrastructure projects under section 1706 of Title XVII of the Energy Policy Act of 2005, as amended by the Inflation Reduction Act of 2022 (42 U.S.C. 16517) and the One Big Beautiful Bill Act (Pub. L. No. 119-21, 139 Stat. 72 (July 4, 2025)) (the Energy Dominance Financing or EDF Program). The EDF Program provides loan guarantees for projects that either (1) retool, repower, repurpose or replace energy infrastructure that has ceased operations; (2) enable operating energy infrastructure to increase capacity or output; or (3) support or enable the provision of known or forecastable electric supply at time intervals necessary to maintain or enhance grid reliability or other system adequacy needs (42 U.S.C. 16517(a)(2) and Pub. L. No. 119-21, 139 Stat. 72 (July 4, 2025)).

The EDF 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 EDF Program. In its application, AEP has identified the East Lima to Columbus Grove Transmission Line Rebuild (the Project) for inclusion in the funding facility that is the subject of EDF’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 EDF loan guarantee; accordingly, EDF will complete environmental reviews pursuant to applicable and relevant environmental statutes for these projects prior to their inclusion in the funding facility that is the subject of EDF’s loan guarantee.

Project Description

The Project will rebuild approximately 1.5 miles of existing linear transmission line infrastructure generally within its existing 50-foot-wide right-of-way (ROW) between the existing East Lima Station and Blue Lick Station, in Allen County, Ohio. The Project requires minor deviations that require additional ROW for maximizing clearance above the interchange between Blue Lick Road and U.S. Interstate 75, for new tower connections to both stations, and minor offsets measuring four to six feet between the existing and proposed centerline. Existing ROW will also be removed. Overall, there will be a net addition of 0.7 acre of ROW to the existing 8.41 acres ROW. Proposed construction activities include removing 39 existing 65-foot-tall wood poles and replacing them with 19 new single steel poles and upgrading the wires to improve electrical reliability for area customers. The new steel poles are generally 80 feet tall.

The existing ROW consists primarily of disturbed lands and is dominated by old field and scrub-shrub vegetation communities; wetlands, forest (along the ROW edges), and developed (roads) make up the remaining vegetation communities. The broader landscape adjacent to and around the Project consists of similar land uses and vegetation communities, but consists primarily of crop lands. The Project runs parallel and immediately adjacent to an existing rail line and U.S. Interstate 75 to the south, and Wolfe Road to the north (for about 0.75 mile).

Approximately 1.57 miles of access roads within and outside of the existing ROW will be used for construction access; no new permanent access is proposed for the Project. Access roads will consist of existing access roads (e.g., public roads, driveways) and temporary access roads where 20-foot-wide timber mats would be placed in previously disturbed areas. All timber matting will be removed at the end of Project construction, and all disturbed areas will be restored to pre-existing conditions. Grading may be required in some areas to ensure a safe surface for construction activities and to promote adequate drainage for storm water runoff.



U.S. Department of Energy Categorical Exclusion Determination Form

Temporary timber matting will be needed for access roads and/or work pads within 7 wetlands (0.90 acre), and permanent fill (<0.07 acre) is proposed for steel pole locations within six wetlands. The small area of permanent wetland impact is covered under Nationwide Permit 57, which satisfies Clean Water Act Section 404 and NEPA compliance for these impacts. Eleven existing poles will be removed from wetlands and the area restored with native wetland seed mix. No other part of the Project would impact surface waters or wetlands.

Numerous temporary work pads and pull pads are required along the Project to remove existing wood poles and conductors and to 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 some extending just beyond the existing ROW in previously disturbed areas (0.84 acre). All Project materials will be stored off-site at a permitted AEP designated laydown yard. In addition, approximately 0.2 acre of trees would be trimmed or removed; approximately 0.1 acre of this tree trimming/removal would occur for temporary access roads and 0.1 acre for ROW deviations. 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 March 2026 and be in operation by November 2027.

EDF'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 proposed threatened monarch butterfly. The USFWS concurred with these determinations on January 23, 2026. As part of this concurrence, AEP will trim/remove trees ≥5 inches diameter at breast height only between October 1 and March 31 in order to avoid adverse effects to the Indiana bat. EDF also made a *no effect* determination on the whooping crane (experimental, non-essential status) due to lack of habitat.

In accordance with the National Historic Preservation Act, EDF consulted with the Ohio State Historic Preservation Office (SHPO). The Ohio SHPO concurred with EDF's Finding of No Historic Properties Affected for this Project on February 24, 2026. EDF identified and contacted seven (7) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Delaware Nation, Oklahoma; Eastern Shawnee Tribe of Oklahoma; Match-e-be-nash-she-wish Band of Pottawatomis Indians of Michigan; Miami Tribe of Oklahoma; Seneca-Cayuga Nation; Shawnee Tribe; and Wyandotte Nation. On February 10, 2026, the Shawnee Tribe responded that they concur that no known historic properties would be affected by the Project and for the Project to continue as planned. No other tribes provided comment on the Project. In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, EDF 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 does not cross any federal, state, or local public lands, or any Federal Emergency Management Agency mapped 100-year floodplains.

Categorical Exclusion(s) Applied:

B4.12 - Construction of powerlines

B4.13 - Upgrading and rebuilding existing powerlines

Choose an item.

Choose an item.

Choose an item.

Categorical Exclusion(s) Description:



U.S. Department of Energy

Categorical Exclusion Determination Form

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).

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.



U.S. Department of Energy Categorical Exclusion Determination Form

Corporate Validation:

Name and Title (Print): Christopher Long
Environmental Director

Signature: *Christopher Long*

Date: 2/24/2026

NEPA Compliance Officer:

Name and Title (Print): Todd Stribley
Director, Environmental Programs

Signature:

Date: 2/24/2026