



# U.S. Department of Energy

## Categorical Exclusion Determination Form

<u>Categorical Exclusion Number:</u>	CX-270897
<u>Loan Application Number:</u>	EIR0037
<u>Proposed Action Title:</u>	American Electric Power's (AEP) Duncan to Rush Springs Tap Transmission Line Rebuild Project
<u>Program of Field Office:</u>	Office of Energy Dominance Financing (EDF)
<u>Location(s) (City/County/State):</u>	Grady and Stephens counties, Oklahoma

Proposed Action Description:

The Project will rebuild approximately 24.7 miles of existing linear transmission line infrastructure generally within its existing 100-foot-wide right-of-way (ROW) between the existing Duncan Substation and Cox City Road, in Grady and Stephens counties, Oklahoma. There are three minor deviations that result in slight shifting of the existing ROW wholly outside of the existing ROW footprint for short distances (totaling 2.3 miles total) to avoid residential buildings, minimize impacts of wetlands, reduce angle structures, and ensure AEP's horizontal distances from any buildings or structures encroaching on the existing ROW. There are several other small centerline shifts of the transmission line that result in a small commensurate shift of the existing ROW, but the transmission line itself will still remain within the existing ROW footprint. The new ROW areas for the deviations and small centerline shifts are primarily in previously disturbed areas.

Proposed construction activities include removing 216 existing 70-foot-tall wooden H-frame (two poles with cross bracing) transmission line structures and replacing them with 226 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 existing transmission line structures support three (3) conductors, two (2) shield wires, and one (1) all-dielectric self-supporting cable (ADDS), while the new steel poles will support three (3) conductors, one (1) shield wire, and one (1) ADDS (one less cable/wire overall compared to existing number of cables/wires). The transmission line runs in a north-south direction, except a 2.75-mile segment leading to the southern terminus, which is in a southwest-northeast and west direction before turning north again for a short distance (~0.5 mile).

The Project area around the existing ROW generally consists of native and improved grasslands that are utilized primarily for grazing livestock or hay production, cross timbers forest, mixed forest, riparian forest, cultivated fields, emergent wetlands, scrub-shrub wetlands, and forested wetlands. Existing road ROW and scattered residential and commercial properties are also located throughout the Project area. The existing ROW itself is frequently or periodically maintained through the use of mowing and/or herbicide treatments to control growth of woody vegetation. Limbs from adjoining forested areas are regularly trimmed along the ROW edge to meet reliability standards (i.e., to prevent power outages from tree contact) and for prevention of fire and safety hazards. Areas that are less maintained contain dense, brushy stands of saplings, shrubs, vines, and brambles. The Project proposes or introduces no new fragmentation of ecological processes not already altered by human activity.

Existing roads and/or temporary access roads will be used for construction. All temporary access will take place in areas previously disturbed, including the existing transmission line ROW and areas that are occasionally mowed or plowed, or disturbed by other vehicular activities. Temporary pull pads (required to string conductors on the new poles) will be located primarily within the existing and disturbed ROW; in some instances, the temporary pull pads may extend outside of the ROW, but in previously disturbed areas. No permanent wetland or surface water impacts are anticipated, but some temporary wetland impacts for temporary access (e.g., laydown of matting) or temporary pull pads may be required; these temporary impacts would be covered under Nationwide Permit 57. All temporarily disturbed areas would be restored to existing conditions if crop land or lawn, or seeded with native seeds. Approximately 3.04 acres of trees would be trimmed or removed for the slight deviations and centerline shifts, although these tree areas are mostly isolated patches surrounded by agricultural areas and not connected to larger high quality forest areas. The general construction process would entail erosion and sediment control installation, crane pad grading, foundation installation, structure assembly and erection, conductor/wire



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installation, and restoration once construction is completed. Construction is anticipated to begin March 2026 and end October 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 whooping crane, proposed threatened monarch butterfly, and proposed endangered tricolored bat; and would have *no effect* on threatened piping plover and rufa red knot (due to lack of habitat). The USFWS concurred with these determinations on November 26, 2025. As part of this concurrence, AEP will install bird diverters along two portions of the transmission line and will trim/remove trees during the bat inactive season in Oklahoma (16 November to 14 March). In addition, 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.

In accordance with the National Historic Preservation Act, EDF consulted with the Oklahoma State Historic Preservation Office (SHPO) and the Oklahoma Archaeological Survey (OAS). The Oklahoma SHPO and OAS concurred with EDF's finding of no adverse effect on historic properties for this Project on December 17, 2025, and January 7, 2026, respectively. EDF identified and contacted nine (9) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Apache Tribe of Oklahoma; Cherokee Nation; Cheyenne and Arapaho Tribes, Oklahoma; Chickasaw Nation; Comanche Nation, Oklahoma; Kiowa Indian Tribe of Oklahoma; Osage Nation; Quapaw Nation; and Wichita and Affiliated Tribes. On December 19, 2025, the Chickasaw Nation responded that they are in support of the proposed undertaking and do not believe there will be specific historic properties affected. On December 22, 2025, the Quapaw Nation responded by stating the Project will have no effect to known properties of cultural or sacred significance to the Quapaw Nation. 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.

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. Eleven of the 216 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 twelve new steel poles, for a net gain of one new structure in 100-year floodplain. 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 Stephens County and the City of Duncan, and both issued letters of approval for the project for work in the 100-year floodplain. Grady County did not require a floodplain development permit (they also do not participate in the National Flood Insurance Program). 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

B4.12 - Construction of powerlines

Choose an item.

Choose an item.

Choose an item.



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### 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).

**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.

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-Director Environmental

Signature:

Date:

2/2/2026

### NEPA Compliance Officer:

Name and Title (Print):

Todd Stribley, Director,  
Environmental Programs

Signature:

Date:

2/3/2026