



Department of Energy
Washington, DC 20585

May 12, 2026

Ashley McVicar, P.E.
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Subject: U.S. Department of Energy, Office of Energy Dominance Financing,
Initiation of Environmental Review for a Proposed Federal Loan
Guarantee to Alabama Power Company for the Leeds DS Feeder
Distribution Tie Line Improvements Project in Jefferson County,
Alabama

Dear Ashley McVicar:

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF), may provide Federal financial assistance (i.e., a loan or loan guarantee) under Title XVII of the Energy Policy Act of 2005 (“Title XVII”) Public Law 109–58, title XVII (2005), as amended; 42 U.S.C. 16511 et seq.

DOE is considering whether to issue Federal financial assistance to Alabama Power Company (APC) pursuant to its authority. In its application for Federal financial assistance, APC has identified the **Leeds DS Feeder Distribution Tie Line Improvements Project** (Project) in Jefferson County, Alabama.

The Project includes upgrading approximately 1.03 miles of conductor within an existing, maintained 30-foot right-of-way (ROW), encompassing approximately 4.86 acres (Project Area). The Project originates across the street from intersection of Highway 119 (Montevallo Road) and Helen Street SW in Leeds, Alabama. The Project includes 29 existing wooden distribution structures and will have four (4) new structure locations and a slight re-alignment of electrical line. Eight (8) existing poles will be replaced (height will remain within 10 feet of existing poles). Additional infrastructure, such as access roads, off-site parking areas, railroad links, docks, water outfalls and intakes, pipelines, and waste treatment facilities are not required for this project. Minor limb clearing may be necessary, however, no vegetation clearing will occur. The Project is expected to begin construction July 1, 2026, with an anticipated completion by the end of 2026.

EDF, in coordination with APC, identified that the following environmental reviews and consultations are required by the applicable and relevant environmental statutes and Executive Orders (EOs) associated with its proposed Federal financial support:

1. Section 7, Endangered Species Act (16 USC 1536)
2. Section 106 of the National Historic Preservation Act (54 USC 306108)
 - a. EO 13175, Consultation and Coordination With Indian Tribal Governments
3. E.O. 11988, Floodplain Management, and 10 CFR 1022, Floodplains
4. Farmland Protection Policy Act (7 USC 4201-4209)

EDF completed the environmental reviews and consultations associated with the Project, as summarized below.

Section 7, Endangered Species Act (16 USC 1536)

DOE generated an Official Species List on May 4, 2026 (USFWS project code: 2026-0085059). Fifteen threatened, endangered, or proposed for listing species were identified as having potential to occur in the project area. Suitable habitat exists for two species (Indiana bat and Tricolored bat) adjacent to the right-of-way. Using the U.S. Fish and Wildlife Service's Determination Key for the Tricolored bat, EDF reached a *no effect* determination for this species. For the Indiana bat, EDF has reached a *no effect* determination on the basis that: there are no cave/karst features in the project area, all project activities will occur within the existing, maintained right-of-way, and no tree clearing will occur adjacent to the right-of-way. For all other species, EDF has reached a *no effect* determination on the basis that no suitable habitat exists within the project area.

The project area does not overlap with designated Critical Habitat for any of these species.

Section 106, National Historic Preservation Act (54 USC 306108) and EO 13175

In accordance with Section 106 of the National Historic Preservation Act (NHPA), on April 10, 2026, DOE EDF initiated consultation with the Alabama State Historic Preservation Office (SHPO) and five Native American Tribes including: Alabama-Coushatta Tribe of Texas; Alabama-Quassarte Tribal Town; Coushatta Tribe of Louisiana; Muscogee (Creek) Nation; and Seminole Tribe of Florida.

DOE's consultation package indicated a Finding of No Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1).

On May 6, 2026, the Alabama SHPO provided a letter of concurrence with DOE's Finding of No Historic Properties Affected. The Alabama SHPO's concurrence letter stipulates:

If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks,

worked wood, bone and stone, metal, and glass objects. The federal agency or the applicant receiving federal assistance should contact [SHPO's] office immediately. If human remains are encountered, the provisions of the Alabama Burial Act (Code of Alabama 1975, §13A-7-23.I, as amended Alabama Historical Commission Administrative Code Chapter 460-X-10 Burials) should be followed. This stipulation shall be placed on the construction plans to ensure contractors are aware of it.

No tribes responded. Further, no objections were received from these parties within 30 days of receipt of DOE's Finding; therefore, in accordance with 36 CFR § 800.4(d)(1)(i), DOE EDF's responsibilities under section 106 are fulfilled.

E.O. 11988, Floodplain Management, and 10 CFR 1022, Floodplains

The existing distribution tie-in line crosses approximately 300 linear feet of 100-year, 500-year, and Regulatory Floodway floodplain (total) at the eastern terminus of the line. There would be no change to base flood elevations as a result of in-kind replacements of structures at this terminus. No net new pole structures will be installed in the floodplain.

Farmland Protection Policy Act (7 USC 4201-4209)

On May 6, 2026, NRCS determined that the Project is exempt from review under the Farmland Protection Policy Act.

Conclusion

EDF notes that APC is responsible for obtaining permits, approvals, and/or authorizations required for the construction and/or operation of the Project.

With this letter, EDF confirms that it has completed the environmental reviews and consultations required by the applicable and relevant environmental statutes and EOs associated with its proposed Federal financial support.

Respectfully,

Molly R. Cobbs
Environmental Project Manager
Office of Energy Dominance Financing

cc: Denis O'Meara, EDF Utilities Vertical Lead
Todd Stribley, Director, EDF Environmental Programs
Giulio Areinamo-Duque, EDF Portfolio Management Division