



Department of Energy
Washington, DC 20585

September 8, 2026

Scott Osterholt, Managing Director Federal Grants and Broadband
American Electric Power
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Subject: U.S. Department of Energy, Office of Energy Dominance Financing,
Completion of Environmental Review for American Electric Power's Fort
Steuben to Hammondsville 69-kV Transmission Line Rebuild Project in
Jefferson County, Ohio

Dear Mr. Osterholt:

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has issued a Federal loan guarantee to American Electric Power (AEP) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to AEP is intended to provide financing for many projects over the life of the Federal loan guarantee. Each project is reviewed and considered individually prior to being approved for financing under the Federal loan guarantee. AEP has identified the Fort Steuben to Hammondsville 69-kV Transmission Line Rebuild (Project) in Jefferson County, Ohio.

The Project will rebuild approximately 0.2 mile of existing transmission line generally in the location that it exists today and expanding the existing 70-foot-wide right-of-way (ROW) to a new width of 80 feet to satisfy modern voltage standards. A small centerline deviation measuring up to 32 feet between one existing and one new structure is required to simplify the alignment and reduce the number of structures necessary to rebuild the transmission line. Despite this minor deviation, the rebuilt transmission line centerline will stay within the existing ROW for the entirety of its length. A total of four (4) 25 to 85-foot-tall existing structures (two steel lattice structures and two wood pole structures) will be removed, and two (2) new approximately 80-foot-galvanized steel poles will be installed, as well as overhead conductors and shield wire. Access roads will consist of existing roads and temporary roads (i.e., temporary timber matting or gravel placed on the ground that would be removed and restored upon construction completion); no new access roads will be needed for construction. Some of the existing access roads may require grading to ensure a safe surface and promote adequate drainage for stormwater runoff. Temporary work/pull pads will be located within the existing ROW, as well as outside of and adjacent to the ROW in some locations. Construction will require some vegetation clearing outside of the existing ROW for work/pull pads placement (including in forest areas), and some tree trimming or removal will be required along some of the existing access roads for equipment access. However, these disturbed

areas will be restored following construction and reseeded with an appropriate local seed mix to promote revegetation and site recovery. No wetlands or surface waters will be impacted by the Project. The general construction process will entail erosion and sediment control installation, access road work, crane pad grading, removal of existing structures and conductors, foundation installation, structure assembly and erection, conductor/wire installation, and restoration once construction is completed. Construction is anticipated to begin October 1, 2026, with Project operation by July 1, 2027.

EDF conducted the environmental reviews and consultations required by the applicable and relevant environmental statutes and Executive Orders (EOs) associated with its proposed Federal financial support. The applicable and relevant environmental statutes and EOs included:

1. Section 7 of the 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

Applicable and Relevant Environmental Review(s)

Section 7, Endangered Species Act

On July 17, 2026, EDF obtained from the U.S. Fish and Wildlife Service (USFWS) an Official Species List (Project Code 2026-0103158), which resulted in the following species identified as occurring or potentially occurring in the Project area: the endangered Indiana bat and Northern long-eared bat; the proposed endangered tricolored bat; and the proposed threatened monarch butterfly. No critical habitat is designated or proposed in the Project area. EDF utilized the USFWS' All Ohio Bat Dkey in the USFWS' Information for Planning and Consultation (IPaC) website, and on July 17, 2026, obtained a *may affect, not likely to adversely affect* determination for the three bat species. After the 30-day Dkey verification period, the USFWS did not provide any further comment on the Project, and therefore, USFWS officially concurred with EDF's determinations on August 17, 2026. USFWS' concurrence is based on the following conservation measures that AEP must implement as part of the Project:

1. Trees ≥ 3 inches in diameter at breast height (dbh) must be trimmed or cleared between October 1 and March 31.
2. Tree cutting/trimming will not exceed 5 acres of forest.
3. Tree cutting/trimming will not fragment a connective corridor between 2 or more forest patches of at least 5 acres.

As a proposed species, the monarch butterfly has a different threshold of analysis and the Federal action agency is required to determine if their action would be likely to jeopardize the continued existence of the species, and if so, request a Conference Consultation with the USFWS. EDF does not believe the Project would be likely to jeopardize the continued existence of the species given the low potential for high-quality habitat and the generally disturbed nature of the existing Project area. In addition, EDF does not anticipate a USFWS decision on whether to formally list the monarch butterfly in the immediate future; as reflected in the Trump Administration's [Unified Agenda of Regulatory and Deregulatory Actions](#), the final listing determination for the species is included as a "long-term action."

Section 106, National Historic Preservation Act

In accordance with the National Historic Preservation Act (NHPA), EDF consulted with the Ohio State Historic Preservation Office (SHPO). On August 31, 2026, the Ohio SHPO concurred with EDF's finding of No Historic Properties Affected. EDF identified and contacted six (6) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Delaware Nation, Oklahoma; Eastern Shawnee Tribe of Oklahoma; Miami Tribe of Oklahoma; The Osage Nation; Seneca Nation of Indians; and Seneca-Cayuga Nation. The Osage Nation responded and stated they do not anticipate the Project will adversely impact any cultural resources or human remains protected under NHPA, National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, or Osage law. No other comments were received from the remaining Tribes.

Conclusion

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

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

Respectfully,

Todd Stribley
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Office of Energy Dominance Financing

cc: Denis O'Meara, EDF Utilities Vertical Lead
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