



Department of Energy
Washington, DC 20585

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Scott Osterholt, Managing Director Federal Grants and Broadband
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Subject: U.S. Department of Energy, Office of Energy Dominance Financing,
Completion of Environmental Review for American Electric Power's East
Wheelersburg to Sadiq Switch Transmission Line Rebuild
Project in Scioto 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 East Wheelersburg to Sadiq Switch Transmission Line Rebuild Project (Project) in Scioto County, Ohio.

The Project will rebuild approximately 2 miles of existing 138-kilovolt transmission line between the East Wheelersburg Station and the Sadiq Switch, which will involve rebuilding the existing transmission line adjacent and parallel to its current location (approximately 50 feet offset from existing transmission line) so that AEP can keep the existing line energized until the rebuild is complete. This will require the current 100-foot right-of-way (ROW) to shift approximately 50 feet; the existing ROW that falls outside of the new ROW will be abandoned and no longer maintained. Two small deviations are required at each terminus of the Project to facilitate a new approach to the East Wheelersburg Station and Sadiq Switch to avoid the existing transmission line's approach. A total of twelve existing approximately 65-foot-tall wood poles will be removed and replaced with thirteen approximately 80-foot-tall steel poles, 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 and pull pads will be located primarily within the existing ROW, but may extend just outside of the ROW in some locations. Construction will require some vegetation clearing outside of the ROW for work/pull pad 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. Temporary matting will be placed in one wetland and one temporary timber bridge over one stream for access roads, which will be covered under a Clean Water Action Nationwide Permit 57; no in-water work in streams or other surface waters will occur. The general construction process will entail erosion and sediment control installation, access road work, crane pad grading, foundation installation, structure assembly and erection, conductor/wire installation, removal of existing structures and conductors, and restoration once construction is completed. Construction is anticipated to begin October 2, 2026, with Project operation by November 4, 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

AEP obtained from the U.S. Fish and Wildlife Service (USFWS) an Official Species List (Project Code 2026-0090834), which resulted in the following species identified as occurring or potentially occurring in the Project area: the endangered Indiana bat, Northern long-eared bat, and pink mucket (clam); the proposed endangered salamander mussel; the threatened small whorled pogonia and Virginia spiraea; and the proposed threatened monarch butterfly. The proposed endangered tricolored bat is also known to occur throughout Ohio based on the USFWS' technical assistance review of the project for AEP. No critical habitat is designated or proposed in the Project area. On July 31, 2026, EDF informally consulted with the USFWS and requested concurrence with EDF's *may affect, not likely to adversely affect* determinations for the Indiana bat and Northern long-eared bat. USFWS concurred with these determinations on August 5, 2026, which included the following conservation measure 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.

The proposed endangered tricolored bat has similar habitat requirements and stressors as the Indiana bat and Northern long-eared bat, and the primary potential impact from the Project would be the same (tree removal). As such, the required conservation measure mentioned above would similarly benefit the tricolored bat, resulting in the same overall effects determination conclusions made for the Indiana bat and Northern long-eared bat. However, since the tricolored bat is a proposed species, the threshold of analysis is different - likely or not likely to jeopardize the continued existence of the species. DOE EDF has determined that the Project would *not likely jeopardize the continued existence* of the tricolored bat.

EDF made *no effect* determinations for the two aquatic species – pink mucket and salamander mussel – because there would be no in-water work. In addition, the USFWS in their technical assistance letter to AEP for the Project did not indicate any potential concerns or issues with these two species.

EDF made *no effect* determinations for the two plant species – small whorled pogonia and Virginia spiraea – as the species are not known to occur in the Project area and the USFWS’ technical assistance letter to AEP for the Project did not indicate any potential concerns or issues with these two species.

EDF has determined the Project would *not likely jeopardize the continued existence* of the proposed monarch butterfly. Construction of the rebuild would involve limited ground disturbance that would occur primarily within an already existing ROW or along the temporary access roads. Restoration of all temporarily disturbed areas with native seed mixes will minimize any impact. 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 September 1, 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; Delaware Tribe of Indians; Eastern Shawnee Tribe of Oklahoma; Miami Tribe of Oklahoma; The Osage Nation; and Seneca-Cayuga Nation. EDF did not receive any comments from 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,

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