



Department of Energy
Washington, DC 20585

September 25, 2026

Ashley McVicar, P.E.
Water Compliance Manager
Environmental Affairs
Alabama Power Company
600 18th Street North
Birmingham, AL 35291-0040

Subject: U.S. Department of Energy, Office of Energy Dominance Financing,
Completion of Environmental Review for the #57 Thurlow Dam-
Notasulga 115kV Transmission Line Rebuild, Elmore, Tallapoosa, and
Macon Counties, Alabama

Dear Ashley McVicar:

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has issued a Federal loan guarantee to Alabama Power Company (APC) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to APC 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. APC has identified the #57 Thurlow Dam-Notasulga 115kV Transmission Line Rebuild project (Project) for potential inclusion in the loan guarantee. A description of the Project follows.

The Project originates in Elmore County near the Thurlow Dam hydroelectric generating plant, heads southeast for approximately one mile, crosses the Tallapoosa River, continues east for approximately 13 miles, and terminates at the Notasulga Transmission Substation in Macon County.

The Project includes rebuilding approximately 13 miles of the existing 115kV transmission line within a 100-foot-wide right-of-way (ROW), encompassing approximately 158.09 acres. APC proposes to shift the centerline of the existing transmission line approximately 30 feet north within the existing ROW boundaries and within the existing utility corridor. As a result, APC will be required to clear 50 feet of trees and vegetation along the existing 13-mile-long ROW to re-establish the utility corridor within the existing 100-foot-wide ROW. The proposed clearing would not exceed 72 acres within the Project Area. The Project involves the installation of 92 replacement structures, 5 intermediate structure installation, and the construction of 13 miles of 115kV overhead electric transmission line. Since the Project will

occur within an existing transmission line ROW, existing access roads will be used to construct, operate, and maintain the Project when possible. Access to certain areas of the Project may require modifications to existing access roads or the installation of new access roads due to the age of the ROW.

The Project is scheduled to begin construction in October 2026, with a projected commercial operation date of June 2028.

EDF, in coordination with the APC, has identified environmental statutes and EOs applicable to the proposed Federal financial support for the Project include, but are not limited to:

1. Section 7 of the Endangered Species Act (16 USC 1536)
2. Section 106 of the National Historic Preservation Act (54 USC 306108)
 - a. Executive Order 13175, Consultation and Coordination with Indian Tribal Governments
3. Farmland Protection Policy Act (7 USC 4201-4209)
4. Section 5(d) of the Wild and Scenic Rivers Act (16 USC 1271–1287)
5. E.O. 11988, Floodplain Management, and 10 CFR 1022, Floodplains

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

Section 7, Endangered Species Act

In accordance with Section 7(a)(2) of the Endangered Species Act (ESA), EDF reviewed its proposed action, Federal financial support for the Project, to ensure that such action would not be likely to jeopardize the continued existence of federally listed threatened or endangered species, or result in the destruction or adverse modification of designated critical habitat.

On July 8, 2026, EDF obtained the Official Species List for the project, which indicated the following species occur or potentially occur in the Project area: the endangered ovate clubshell and southern clubshell (both clams); the threatened finelined pocketbook (clam) and Georgia rockcress; the proposed endangered tricolored bat; the proposed threatened alligator snapping turtle and monarch butterfly; and the whooping crane (experimental, non-essential population). There is no designated critical habitat present in the Project area. EDF determined the Project would have *no effect* on ovate clubshell, southern clubshell, finelined pocketbook, Georgia rockcress, alligator snapping turtle, and whooping crane due to lack of habitat (Georgia rockcress and whooping crane) or avoidance of potentially suitable habitat (aquatic species) in the Project area. EDF consulted with the U.S. Fish and Wildlife Service (USFWS) on the tricolored bat and monarch butterfly, and on September 24, 2026, the USFWS acknowledged EDF's determination that the Project *would not jeopardize the continued existence* of these two proposed species. As stated in the USFW's letter, additional consultation with the USFWS may be needed if a new species is listed (e.g., tricolored bat, monarch butterfly) and there is potential for the Project to affect the species.

Section 106, National Historic Preservation Act

In accordance with Section 106 of the National Historic Preservation Act (NHPA), on June 22, 2026, DOE EDF initiated consultation with the Alabama State Historic Preservation Office (SHPO) and seven (7) federally recognized Tribes to see if they have an interest in the Project: Alabama-Coushatta Tribe of Texas; Alabama-Quassarte Tribal Town; Cherokee Nation; Coushatta Tribe of Louisiana; Eastern Shawnee Tribe of Oklahoma; Muscogee (Creek) Nation; and Seminole Tribe of Florida. The Cherokee Nation requested additional information about the Project; however, they did not provide comments on the Project.

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

On July 13, 2026, the Alabama SHPO provided a letter of concurrence with DOE's Finding of No Effect to Historic Properties. 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 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.

Farmland Protection Policy Act (7 USC 4201-4209)

On September 23, 2026, U.S. Department of Agriculture's Natural Resources Conservation Service determined that the Project is exempt from review under the Farmland Protection Policy Act.

Section 5(d) of the Wild and Scenic Rivers Act (16 USC 1271-1287)

Section 5(d) of the Wild and Scenic Rivers Act requires federal agencies to consider potential national wild, scenic and recreational river areas in decision-making. To this end, the National Park Service (NPS) has compiled and maintains a Nationwide Rivers Inventory (NRI). The NRI is a register of rivers that may be eligible for inclusion in the National Wild and Scenic River System. The intent of the NRI is to provide information to assist agencies in making balanced decisions regarding the use of the nation's river resources and to prevent potential

impacts to the values for which a river has been placed on the list.

The reach of the Tallapoosa River near the project site is listed on the NRI because of the degree to which it is free flowing (without straightening, diversion, riprapping, or other modifications of the channel), and for its outstandingly remarkable cultural, fish, historic, recreational, scenic, and wildlife values.

Given aerial pulling, no vegetation removal, and no in-water work, DOE finds that the Project will have no adverse effect on the outstandingly remarkable values (ORV) for the Tallapoosa River at this crossing. Additionally, DOE finds that Project would not foreclose options to classify any portion of the NRI segment as wild, scenic, or recreational river areas. On September 2, 2026, the NPS concurred with DOE's determination that the proposed Project would not adversely affect the Tallapoosa River and its ORVs.

Should the details or location of the proposed Project change in the future such that it would affect the Tallapoosa River or nearby tributaries, NPS recommends the following measures which may serve to protect and enhance the ORVs of the Tallapoosa River:

1. The Project footprint and duration should be minimized to that which is necessary to perform the intended purpose to minimize any impacts to the values of the River and tributaries.
2. Disturbed riparian areas should be revegetated, seeded, or otherwise restored to stable condition with native, ecologically appropriate species as soon as possible upon Project completion or during periods of delay.
3. All necessary and appropriate sediment and erosion control practices should be in place for the Project duration until the site is stabilized to prevent the discharge of sediments or other Project-related effluents beyond the construction site.
4. Any existing naturally vegetated riparian corridor should remain intact to preserve the River's outstandingly remarkable values. Removal of existing mature trees and woody vegetation within the Project area should be avoided or minimized to the extent practicable. Operation of heavy machinery within the dripline of trees should be avoided or minimized to prevent soil compaction or root damage.
5. Any effluents, wastes, or pollutant discharges associated with the Project should be contained and should have no direct pathway to the River.

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

No regulatory floodway encroachments and/or impacts would occur as a result of the Project. The Project involves the replacement of five structures within 100-year floodplains with no additional or new impacts to floodways or floodplains (i.e., no net change).

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,

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TODD STRIBLEY
Date: 2026.09.25
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Todd Stribley
Director, Environmental Programs
Office of Energy Dominance Financing

cc: Denis O'Meara, EDF Utilities Vertical Lead
Giulio Areinamo-Duque, EDF Portfolio Management Division