



Department of Energy
Washington, DC 20585

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Subject: U.S. Department of Energy, Office of Energy Dominance Financing Completion of Environmental Review for the Proposed Hamlin to Roby Transmission Line Project in Jones County and Fisher County, Texas

Dear Scott:

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. This letter confirms that EDF has completed the environmental review of AEP's **Hamlin to Roby Transmission Line Project** (Project), in Jones and Fisher Counties, Texas, prior to approving the Project for financing under the Federal loan guarantee. A description of the Project and EDF's environmental review findings follows.

The Project includes the rebuilding of approximately 25.2 miles of existing 69 kV transmission line beginning at the Hamlin Substation and extending west and north to the Round Top Substation and then generally southwest to the Roby Tie-In Dead End (DE) structure. The Project involves rebuilding the existing linear transmission line infrastructure in the general location of each pole structure within the existing 100-foot-wide right-of-way (ROW). A total of 471 structures will be removed and replaced with 258 new structures. The reduction in structures results from increased span lengths and three small reroutes along the transmission line route.

The existing structures that will be removed from the ROW are generally 50-foot-tall wood poles. The replacement structures will be 80-foot-tall steel monopoles with new conductors. Existing roads will be used to access the ROW during construction. Construction activities will include erosion and sediment control, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, and restoration activities following construction completion. Construction is anticipated to begin in September 2026.

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
3. E.O. 11988, Floodplain Management, and 10 CFR 1022, Floodplains
4. Farmland Protection Policy Act (7 USC 4201-4209)

Applicable and Relevant Environmental Review(s)

Section 7, Endangered Species Act

On July 17, 2026, DOE obtained from the U.S. Fish and Wildlife Service an Official Species List (Project Code 2026-0116755), which resulted in the following species identified as occurring or potentially occurring in the Project area: the threatened piping plover (*Charadrius melodus*) and rufa red knot (*Calidris canutus rufa*); the endangered sharpnose shiner (*Notropis oxyrhynchus*), smalleye shiner (*Notropis buccula*); and the proposed threatened monarch butterfly (*Danaus plexippus*). No designated critical habitat was identified in the Project area. On July 17, 2026, DOE completed the Texas Statewide Determination key (Texas Dkey) in IPaC, which returned a result of *no effect* for the piping plover, rufa red knot, sharpnose shiner, and smalleye shiner.

DOE understands that as a proposed species under ESA, 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. DOE does not believe the Project would be likely to jeopardize the continued existence of the species given the low potential for habitat and disturbed nature of the existing Project area and associated ROW. In addition, DOE does not anticipate a USFWS decision on whether to formally list the monarch butterfly any time soon; as reflected in the Trump Administration's [Unified Agenda of Regulatory and Deregulatory Actions](#), the final listing determination for the monarch butterfly 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 Texas State Historic Preservation Office (SHPO). On August 31, 2026, the Texas SHPO concurred with EDF's finding of no historic properties affected for this project. DOE identified and contacted four federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area (Apache Tribe of Oklahoma; Comanche Nation, Oklahoma; Tonkawa Tribe of Indians of Oklahoma; and Wichita and Affiliated Tribes (Wichita, Keechi, Waco, and Tawakonie), Oklahoma). No comments were received from these Tribes.

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

A portion of the existing right-of-way is within the 100-year floodplain. All existing structures within the 100-year floodplain will be replaced with new structures. Each of these structures will be replaced in the same location. There would be no change to base flood elevations as a result of the in-kind replacement. No net new pole structures will be installed in the floodplain. No 500-year floodplain or regulatory floodways were identified within the project area.

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.

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

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.

Respectfully,

Todd Stribley
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Office of Energy Dominance Financing

cc: Denis O'Meara, EDF Utilities Vertical Lead
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