



Department of Energy
Washington, DC 20585

September 30, 2026

Scott Osterholt, Managing Director Federal Grants and Broadband
American Electric Power
1 Riverside Plaza
Columbus, OH 43215
ssosterholt@aep.com

Subject: U.S. Department of Energy, Office of Energy Dominance Financing,
Completion of Environmental Review for American Electric Power's
Millbrook Park to East Wheelersburg 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 Millbrook Park to East Wheelersburg Transmission Line Rebuild (Project) in Scioto County, Ohio.

The Project will rebuild approximately 8.7 miles of existing 138-kilovolt transmission line between the Millbrook Park Station and East Wheelersburg Station generally in the location that it exists today within its existing 100-foot right-of-way (ROW). One minor deviation to avoid an existing garage in the ROW and several minor centerline offsets that require slight expansions of the existing ROW result in approximately 5.6 acres of additional ROW necessary for the rebuild (existing ROW is 106.36 acres and proposed ROW is 112.05 acres). Despite the minor deviation and centerline offsets, the rebuilt transmission line centerline will stay within the existing 100-foot ROW for nearly its entire length except for about 250 feet, which will cross a residential lawn and active crop field. A total of 41 existing steel lattice and steel pole structures (ranging in height from 75 feet to 170 feet) will be removed and replaced with 43 structures (two existing structures will remain in place), which include thirty one (31) custom steel mono pole suspension/angles, nine (9) custom steel mono-pole dead-ends, two (2) custom 2-pole dead-ends and one (1) custom 3-pole dead-end, as well as overhead conductors and shield wire. The 43 replacement structures will range in height from 75 feet to 150 feet. Approximately 8.47 miles of access roads will be required for construction, which 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 ROW in some locations. While some of the work and pull pads outside of the ROW occur in previously disturbed areas, some areas will require vegetation clearing (e.g., 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 two wetlands and timber bridges over five streams 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. A total of 17.45 acres of temporary disturbance would occur within the ROW during construction, and approximately 31.49 acres of temporary disturbance would occur outside of the ROW for temporary work/pull pads and access roads. All Project materials will be stored off-site at a permitted AEP designated laydown yard. 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 May 4, 2028.

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 2026-0097950), which resulted in the following species identified as occurring or potentially occurring in the Project area: the endangered Indiana bat, Northern long-eared bat, pink mucket (clam), fanshell (clam), sheepsnose mussel, and snuffbox mussel; the threatened longsolid, round hickorynut, small whorled pogonia, and Virginia spiraea; the proposed endangered tricolored bat, eastern hellbender, and salamander mussel; and the proposed threatened monarch butterfly. No critical habitat is designated or proposed in the Project area. On August 26, 2026, the USFWS concurred that the Project would be *not likely to adversely affect* the Indiana bat, Northern long-eared bat, and tricolored bat, based on the following condition that AEP must implement:

Trees $\geq$ 3 inches in diameter at breast height (dbh) must be trimmed or cleared between October 1 and March 31.

EDF made *no effect* determinations for the eight aquatic species – pink mucket, fanshell, sheepsnose mussel, snuffbox mussel, longsolid, round hickorynut, eastern hellbender, 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 the clams or mussels.

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 8, 2026, and September 29, 2026, the Ohio SHPO concurred with EDF’s finding of No Adverse Effect for architectural resources and archaeological resources, respectively. 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. 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,

DONALD BROWN

Digitally signed by DONALD
BROWN
Date: 2026.09.30 17:04:12 -04'00'

Don Brown
Environmental Project Manager
Office of Energy Dominance Financing

cc: Denis O'Meara, EDF Utilities Vertical Lead
Todd Stribley, EDF Director, Environmental Programs
Marla Waters, Project Manager, American Electric Power
Yolanda Gorman, Project Manager, American Electric Power
Rachel Shifman, EDF Portfolio Management Division