



Department of Energy
Washington, DC 20585

October 20, 2026

Scott Osterholt, Managing Director
American Electric Power
1 Riverside Plaza
Columbus, OH 43215

Subject: U.S. Department of Energy, Office of Energy Dominance Financing Completion of
Environmental Review for the Proposed La Pryor to Poblano Transmission Line Project
in Uvalde County, Texas

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. This letter confirms that EDF has completed the environmental review of AEP's **La Pryor to Poblano Transmission Line Project** (Project), in Uvalde County, 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 involves rebuilding approximately 0.47 miles of the existing 138 kV transmission line in the general location of each pole structure within the existing right-of-way (ROW), the reconfiguration of the connection to the existing Poblano Station, and the expansion of the existing ROW from 50-foot-wide to 100-foot-wide. A total of 10 new steel monopoles will be constructed, and the existing wood poles will be removed. All existing structures, generally 50-foot-tall wood poles, will be removed from the ROW and replaced with new structures, generally 80-foot-tall steel monopoles and conductors. The expansion of the ROW will increase the total area within the ROW from 2.85 to 5.7 acres.

Existing roads and ROW will be used for construction. Construction activities consistent with transmission lines typically 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 October 2026.

Because the Project has distinct end points at Dead End (DE) structures, it is considered a separate and independent utility. The Project can independently manage the flow of electricity based on demand, load, and outages. If the line requires maintenance or experiences a fault, other lines in the vicinity can continue to operate without disruption. This redundancy ensures continuous power

supply and communication, enhancing the reliability of the transmission system. This flexibility minimizes disruptions and maintains system stability. These factors demonstrate that the Project functions independently of other nearby existing infrastructure.

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 October 15, 2026, DOE obtained from the U.S. Fish and Wildlife Service an Official Species List (Project Code 2026-0006053), which resulted in the following species identified as occurring or potentially occurring in the Project area: the endangered fountain darter (*Etheostoma fonticola*); the threatened San Marcos salamander (*Eurycea nana*); the endangered Texas blind salamander (*Eurycea rathbuni*); the endangered Comal Springs dryopid beetle (*Stygoparnus comalensis*); the endangered Comal Springs riffle beetle (*Heterelmis comalensis*); the endangered Peck's cave amphipod (*Stygobromus* (= *Stygonectes*) *pecki*); the endangered Texas wild-rice (*Zizania texana*); and the proposed threatened monarch butterfly (*Danaus plexippus*). No designated critical habitat was identified in the Project area. On October 15, 2026, DOE completed the Texas Statewide Determination key (Texas Dkey) in IPaC, which returned a result of *no effect* for the Comal Springs dryopid beetle, Comal Springs riffle beetle, Fountain darter, Peck's cave amphipod, San Marcos salamander, Texas blind salamander, and Texas wild-rice.

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 September 28, 2026, the Texas SHPO concurred with EDF's finding of no historic properties affected for this project. DOE identified and contacted five federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area (Apache Tribe of Oklahoma; Comanche Nation, Oklahoma; Mescalero Apache Tribe of the Mescalero Reservation, New Mexico; Tonkawa Tribe of Indians of Oklahoma; and Wichita and Affiliated Tribes (Wichita, Keechi, Waco, and Tawakonie), Oklahoma). No comments were received from these Tribes. EDF received a letter

from the Uvalde County Historical Commission on October 5, 2026 noting that there is evidence of pre-contact inhabitants along streams in Uvalde County and requesting notification in the event of an unanticipated discovery of a cultural or historical resource during Project construction.

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

A portion of the existing right-of-way is within the 100-year floodplain. One existing structure within the 100-year floodplain would be replaced with a new structure in the same location. There would be no change to base flood elevations as a result of the in-kind replacement. While small concrete footings will be installed to support the new steel poles, no fill material would be placed within 100-year floodplain and no part of the Project would result in a change to floodplain elevation. No net new pole structures will be installed in the floodplain. No 500-year floodplain or regulatory floodways were identified within the project area. There will be no adverse floodplain impact, and the Project would conform to the applicable floodplain standards.

One short hydroperiod emergent wetland (0.04 acres) was identified within the existing right-of-way. No other surface water features were identified. No temporary impacts are anticipated and no permanent impacts to wetlands or waterbody features are proposed. Potential impacts to the wetland will be avoided or minimized through the use of temporary equipment matting, and any impacted areas will be restored following construction activities.

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.

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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Alicia Williamson

Environmental Project Manager

Office of Energy Dominance Financing

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