Department of Energy
Washington, DC 20585

November 10, 2026

Scott Osterholt, Managing Director Federal Grants and Broadband
American Electric Power
1 Riverside Plaza
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Subject: U.S. Department of Energy, Office of Energy Dominance Financing, Completion of Environmental Review for American Electric Power's Rader Road to New Liberty Install Transmission Line Rebuild Project in Hancock 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 Rader Road to New Liberty Install Transmission Line Rebuild (Project) in Hancock County, Ohio.

The Project involves rebuilding approximately 6.9 miles of existing 138-kilovolt (kV) transmission line generally in the location that it exists today and expanding the existing 50-foot-wide right-of-way (ROW) to a new width of 80 feet to meet electrical clearance requirements for the new transmission line structures. Several very small adjustments to the existing ROW are required to reduce angle structures, increase distances from a residence and an existing business, and for a new approach into a substation. A total of 162 existing wood or steel pole structures (45-75 feet in height) will be removed and replaced with 75 galvanized steel pole or mono-pole dead ends (80-105 feet in height), 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. Work and pull pads (timber matting or gravel) will primarily be located within the ROW, but will occur outside of and adjacent to the ROW in some locations. While many of the work and pull pads outside of the ROW occur in previously disturbed areas (e.g., active agricultural fields), some very small areas will require vegetation clearing (e.g., trees), and some tree trimming or removal will be required along some of the 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 timber matting will be required in seven wetlands, and a small area of permanent fill will be required in two wetlands, which will be covered under a Clean Water Act Nationwide Permit 57 (non-notifying). No in-water work in streams or surface waters is proposed. 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 on December 17, 2026, with Project operation by September 1, 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 (ESA)

EDF generated an official ESA species list using the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) website, which identified the following species as potentially occurring in the Project area: endangered Indiana bat, whooping crane (experimental population, non-essential), endangered clubshell, proposed endangered salamander mussel, and proposed threatened monarch butterfly. The USFWS also provided comment to AEP on the endangered northern long-eared bat in their technical assistance review for the Project. According to the USFWS IPaC results, no designated or proposed critical habitat was identified within the Project area. On October 8, 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 October 23, 2026, which included the following conservation measure that AEP must implement as part of the Project:

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

Because the USFWS provided no comment on or had no issues with the clubshell, salamander mussel, monarch butterfly, or whooping crane in their technical assistance review of the Project, EDF made *no effect* determinations for these species. EDF also notes that the Project does not require any in-water work in streams or surface waters.

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 October 27, 2026, the Ohio SHPO concurred with EDF's finding of No Adverse Effect for architectural resources and archaeological resources. The Ohio SHPO provided the following request in their concurrence letter: If additional archaeological resources are discovered during implementation of the Project, then the Ohio SHPO office should be contacted as required by 36 CFR 800.13.

EDF identified and contacted nine (9) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Eastern Shawnee Tribe of Oklahoma; Hannahville Indian Community, Michigan; Little Traverse Bay Bands of Odawa Indians, Michigan; Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan; Miami Tribe of Oklahoma; Ottawa Tribe of Oklahoma; Seneca-Cayuga Nation; Shawnee Tribe; and Wyandotte Nation. The Wyandotte Nation responded on November 9, 2026, with a request for some additional information on EDF's environmental review process but provided no comments pursuant to Section 106 or Tribal resources. EDF replied to the Wyandotte Nation on November 10, 2026. On November 5, 2026, the Shawnee Tribe responded and concurred that no known historic properties would be negatively impacted by the Project, but requested that they be contacted in the event of an inadvertent discovery of archaeological materials or human remains.

No other Tribes responded to EDF's invite to consult on 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 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.

EDF will continue with the environmental due diligence reviews, as needed.

Respectfully,

DONALD BROWN Digitally signed by DONALD BROWN
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Office of Energy Dominance Financing

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