

July 16, 2010

Russell A. Kelly  
Alabama Department of Environmental Management  
P. O. Box 301463  
Montgomery, AL 36130-1463

RE: Proposed Coskata Inc. Cellulosic Ethanol Facility, Greene County, Alabama

Dear Mr. Kelly:

Coskata Inc. is in the process of making a request for financial assistance to USDA-Rural Development. It is necessary that Rural Development determine compliance with the requirements of the environmental assessment process according to their National Environmental Policy Act (NEPA) regulations on any project financed by the agency.

Attached are a location map and a description of the proposed project for which financial assistance has been requested. We would appreciate your advice as to whether the project would affect any regulations under your jurisdiction as well as provide us other information concerning the project site that you may have available. We respectfully request a response from your agency within 30 days of receipt of this letter. If we have already contacted your agency regarding this project, would you please be so kind as to respond directly to this letter so that we may document our correspondence for Rural Development purposes.

Thank you for your time.

Sincerely,



Loula Merkel  
Director of Government Affairs

cc: Juliet Bochicchio, USDA Rural Development

Attachment 1 – Description of the Project

Attachment 2 – Figure 1. Project Vicinity Map (7.5 minute Quadrangle Map)

**Generalized Project Description  
Proposed Cellulosic Ethanol Facility  
Coskata, Inc.  
Greene County, Alabama  
July 2010**

The Project Flagship cellulosic ethanol facility (“Flagship” or the “Project”) is proposed for construction in Boligee, Alabama. The purpose of the project is to produce cellulosic ethanol that will contribute to meeting the requirements of the Renewable Fuel Standard established in the Energy Independence and Security Act of 2007. The proposed capacity of the facility that will convert wood biomass into cellulosic ethanol is estimated to be 55 million gallons of cellulosic ethanol. Flagship proposes the use of locally sourced woody biomass, expected to consist predominantly of Southern Pine and residues, for the ethanol production.

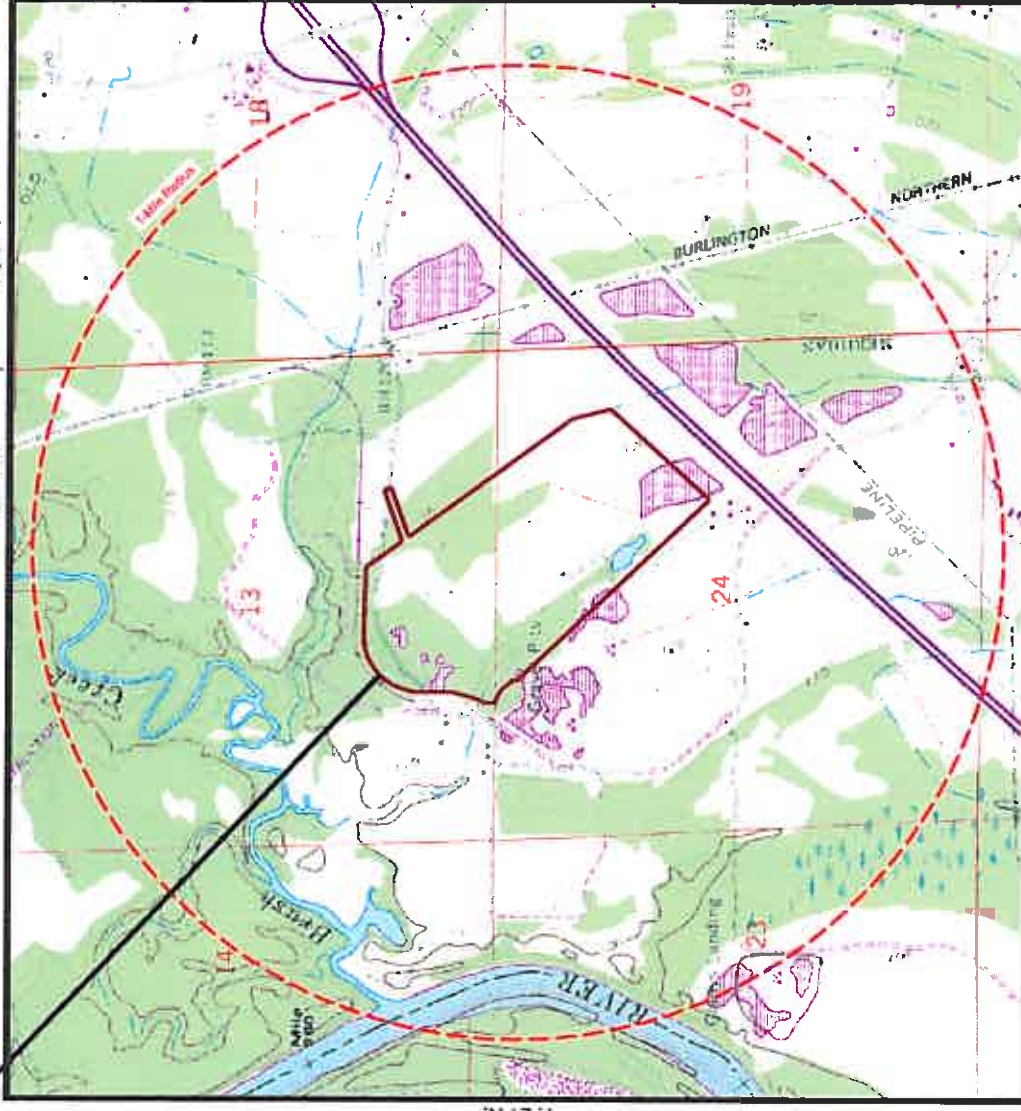
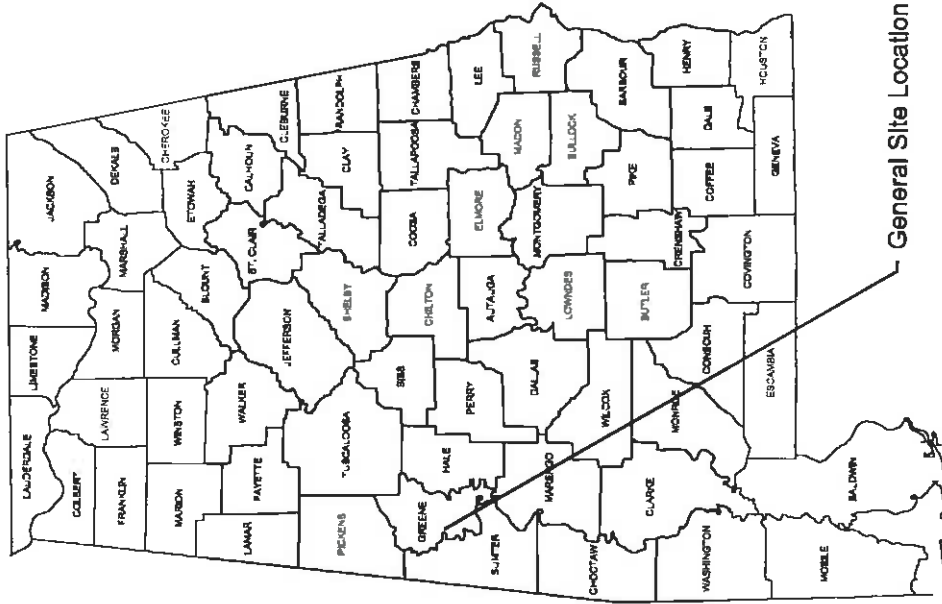
The planned location of Project Flagship is an industrial park and port in Greene County in west central Alabama within the metropolitan area of Tuscaloosa, Alabama. Specifically, the identified site is located within the Crossroads of America Port and Park located southwest of Exit 32 along Interstate 20/59 in Boligee and is bordered by the Tombigbee River along the west and Greene County Road 92 along the north. Brush Creek flows diagonally through the park and empties into the Tombigbee River in the southwest corner. Alabama and Gulf Coast Railroad generally borders the park to the east. Figure 1 shows the location of the proposed facility.

The cellulosic ethanol facility would include the following components:

1. Gasification. A non-food cellulosic feedstock is decomposed to produce synthesis gas (“syngas”) made up of Carbon Monoxide (CO), Hydrogen (H<sub>2</sub>) and CO<sub>2</sub>.
2. Syngas Fermentation. Coskata’s proprietary microorganisms convert the syngas into cellulosic ethanol in our bioreactor system. The ethanol specific yield will be the highest in the industry, making the cellulosic biofuel directly competitive with gasoline.
3. Separation. Ethanol is separated from water via commercially available distillation and molecular sieve technology.
4. Loading areas, Chip Drying facilities, maintenance buildings, storage areas, and associated infrastructure.

The City of Eutaw will provide the facility with an adequate water supply and sanitary sewer capacities. An NPDES permit issued by Alabama Department of Environmental Management (ADEM) will be required for discharge of treated process water and collected stormwater to surface waters. Air Quality and Solid Waste Permits will also be obtained from ADEM. A U.S. Army Corps of Engineers (USACE) Permit will be obtained for proposed impact to onsite wetlands. The project will also be reviewed for any potential impact to other biological, historic, farmland, or floodplain resources.

Approximate Site Boundary



Source: USGS Bollgee, Ala. 7.5 Minute Quadrangle Map, 1970 (Photorevised 1987)



3516 Greenwood Ave., #4  
Tuscaloosa, Alabama 35401  
256.346.0818 # Fax 256.346.0892

TTL PROJECT NO: 860108007  
PROJECT DATE: March 22, 2010

**Figure 1. Site Location and Topographic Map**

S 1/2, Sec. 13 and N 1/2, Sec. 24, T. 21 N., R. 1 W., of the Bollgee, Ala. 7.5 Minute Quadrangle Map  
Proposed Flagship Site  
Crossroads of America Industrial Park  
Bollgee, Greene County, Alabama

1" = 2000'  
(Approximate)





**Alabama Department of Environmental Management**  
[adem.alabama.gov](http://adem.alabama.gov)

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463  
Montgomery, Alabama 36130-1463  
(334) 271-7700 ■ FAX (334) 271-7950

August 3, 2010

Ms. Loula Merkel  
Coskata  
4575 Weaver Parkway, Suite 100  
Warrenville, IL 60555

RE: Environmental Review  
Proposed Cellulosic Ethanol Facility  
Green County, Alabama

Dear Ms. Merkel:

We have reviewed your submittal regarding the referenced project. Based on the information you provided, we have no objections to the project as presented. Please ensure that the following general requirements are met:

1. The project must comply with the storm water permitting requirements found at <http://www.adem.state.al.us/FieldOps/Permitting/ConstructionProject.pdf>.
2. The project must comply with all applicable Department regulations.

This letter should not be construed as an approval on behalf of any other agency. If you have any questions, please contact me at (334) 271-7796.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Johnson", is written over a white background.

Ron Johnson  
SRF, Certification, and General Services Branch  
Permits and Services Division





# West Alabama Regional Commission

4200 Highway 69 North, Suite 1 • P.O. Box 509 • Northport, Alabama 35476-0509

205.333.2990 • Facsimile 205.333.2713

Waymon Fields, Chairman  
Ricky Hubbard, Vice-Chairman

Robert B. Lake, Executive Director

July 8, 2010

Mrs. Phillis Belcher  
Greene County Industrial Development Board  
P.O. Box 70  
Eutaw, AL 35462

Dear Phillis:

Subject: Executive Order 12372

We have received your request for an Intergovernmental Review for your application to the U.S. Department of Agriculture to assist a new industry.

West Alabama Regional Commission is no longer acting in the role of regional clearinghouse for projects proposed for federal funding. Since Alabama does not have a Single Point of Contact for such projects, the U.S. Office of Management and Budget recommends that applicants send materials directly to the federal awarding agency.

With best regards,



Robert B. Lake

RBL:JDR



July 16, 2010

Mr. Milton Tuck  
National Resource Conservation Service  
420 Hackberry Ln,  
PO Box 861482  
Tuscaloosa, AL 35486-0013

RE: Proposed Coskata Inc. Cellulosic Ethanol Facility, Greene County, Alabama

Dear Mr. Tuck:

Coskata Inc. is in the process of making a request for financial assistance to USDA-Rural Development. It is necessary that Rural Development determine compliance with the requirements of the environmental assessment process according to their National Environmental Policy Act (NEPA) regulations on any project financed by the agency.

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Thank you for your time.

Sincerely,

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Loula Merkel  
Director of Government Affairs

cc: Juliet Bochicchio, USDA Rural Development

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**Generalized Project Description  
Proposed Cellulosic Ethanol Facility  
Coskata, Inc.  
Greene County, Alabama  
July 2010**

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2. Syngas Fermentation. Coskata’s proprietary microorganisms convert the syngas into cellulosic ethanol in our bioreactor system. The ethanol specific yield will be the highest in the industry, making the cellulosic biofuel directly competitive with gasoline.
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The City of Eutaw will provide the facility with an adequate water supply and sanitary sewer capacities. An NPDES permit issued by Alabama Department of Environmental Management (ADEM) will be required for discharge of treated process water and collected stormwater to surface waters. Air Quality and Solid Waste Permits will also be obtained from ADEM. A U.S. Army Corps of Engineers (USACE) Permit will be obtained for proposed impact to onsite wetlands. The project will also be reviewed for any potential impact to other biological, historic, farmland, or floodplain resources.





**United States Department of Agriculture  
Rural Development**

July 19, 2010

Milton Tuck  
420 Hackberry Lane  
PO Box 861482  
Tuscaloosa, AL 35486-0013

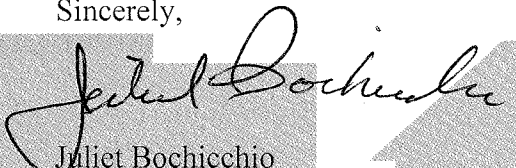
Dear Mr. Tuck,

Enclosed is a partially completed AD 1006 Form (Part I and III) for a proposed cellulosic ethanol facility to be located in Green County, AL proposed for funding from USDA Rural Development (USDA-RD). USDA-RD is requesting that NRCS complete Parts II, IV, and V. We would also like to request an expedited review if possible as we would like to complete the environmental review process prior to the end of this fiscal year.

If I can provide any additional information in order to complete this form please do not hesitate to contact me at 202-205-8242 or [juliet.bochicchio@wdc.usda.gov](mailto:juliet.bochicchio@wdc.usda.gov). Also, when responding to this request, please include the following **Mail Stop 0761** (as listed below) in the address to ensure it arrives at my office. I appreciate all of your efforts.

Juliet Bochicchio  
USDA Rural Development  
1400 Independence Avenue SW  
Mail Stop 0761  
Washington DC 20250

Sincerely,



Juliet Bochicchio  
Environmental Protection Specialist



1400 Independence Ave. S.W. · Washington DC 20250-0700  
Web: <http://www.rurdev.usda.gov>

Committed to the future of rural communities.

"USDA is an equal opportunity provider, employer and lender."  
To file a complaint of discrimination, write USDA, Director, Office of Civil Rights,  
1400 Independence Avenue, S.W., Washington, DC 20250-9410 or call (800) 795-3272 (Voice) or (202) 720-6382 (TDD).



U.S. Department of Agriculture

# FARMLAND CONVERSION IMPACT RATING

<b>PART I (To be completed by Federal Agency)</b>	Date Of Land Evaluation Request 7/16/10
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Name Of Project Coskata	Federal Agency Involved USDA Rural Development
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Proposed Land Use Cellulosic Ethanol Facility	County And State Greene County Alabama
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<b>PART II (To be completed by NRCS)</b>	Date Request Received By NRCS
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Does the site contain prime, unique, statewide or local important farmland? <i>(If no, the FPPA does not apply -- do not complete additional parts of this form).</i>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Acres Irrigated	Average Farm Size
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Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %	Amount Of Farmland As Defined in FPPA Acres: %
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Name Of Land Evaluation System Used	Name Of Local Site Assessment System	Date Land Evaluation Returned By NRCS
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<b>PART III (To be completed by Federal Agency)</b>	Alternative Site Rating			
	Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly	101.0			
B. Total Acres To Be Converted Indirectly	50.0			
C. Total Acres In Site	151.0	0.0	0.0	0.0

<b>PART IV (To be completed by NRCS) Land Evaluation Information</b>				
A. Total Acres Prime And Unique Farmland	0.0			
B. Total Acres Statewide And Local Important Farmland	0.0			
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted	0.0			
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value				

<b>PART V (To be completed by NRCS) Land Evaluation Criterion</b>				
Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)	0	0	0	0

<b>PART VI (To be completed by Federal Agency)</b>	Maximum Points				
<i>Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))</i>					
1. Area In Nonurban Use	15	0			
2. Perimeter In Nonurban Use	10	0			
3. Percent Of Site Being Farmed	20	0			
4. Protection Provided By State And Local Government	20	0			
5. Distance From Urban Builtup Area	15	0			
6. Distance To Urban Support Services	10	0			
7. Size Of Present Farm Unit Compared To Average	10	0			
8. Creation Of Nonfarmable Farmland	10	0			
9. Availability Of Farm Support Services	5	0			
10. On-Farm Investments	10	0			
11. Effects Of Conversion On Farm Support Services	10	0			
12. Compatibility With Existing Agricultural Use	10	0			
<b>TOTAL SITE ASSESSMENT POINTS</b>	160	0	0	0	0

<b>PART VII (To be completed by Federal Agency)</b>					
Relative Value Of Farmland (From Part V)	100	0	0	0	0
Total Site Assessment (From Part VI above or a local site assessment)	160	0	0	0	0
<b>TOTAL POINTS (Total of above 2 lines)</b>	260	0	0	0	0

Site Selected:	Date Of Selection	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input type="checkbox"/>
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Reason For Selection:

Farmland Classification—Greene County, Alabama  
(Flagship - Prime Farmlands)



Map Scale: 1:11,800 if printed on A size (8.5" x 11") sheet.



## MAP LEGEND

Area of Interest (AOI)	Prime farmland if subsoiled, completely removing the root inhibiting soil layer	US Routes
Soils	Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60	Major Roads
Soil Map Units	Prime farmland if irrigated and reclaimed of excess salts and sodium	Local Roads
Soil Ratings	Farmland of statewide importance	
Not prime farmland	Farmland of local importance	
All areas are prime farmland	Farmland of unique importance	
Prime farmland if drained	Not rated or not available	
Prime farmland if protected from flooding or not frequently flooded during the growing season		
Prime farmland if irrigated	<b>Political Features</b>	
Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season	Cities	
Prime farmland if irrigated and drained	<b>Water Features</b>	
Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	Oceans	
	Streams and Canals	
	<b>Transportation</b>	
	Rails	
	Interstate Highways	

## MAP INFORMATION

Map Scale: 1:1,800 if printed on A size (8.5" x 11") sheet.  
The soil surveys that comprise your AOI were mapped at 1:20,000.

Please rely on the bar scale on each map sheet for accurate map measurements.

Source of Map: Natural Resources Conservation Service  
Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov>  
Coordinate System: UTM Zone 16N NAD83

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Greene County, Alabama  
Survey Area Data: Version 6, Feb 15, 2007  
Date(s) aerial images were photographed: 9/4/2006

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Milton Tuck

205-247-3723

## Farmland Classification

Farmland Classification— Summary by Map Unit — Greene County, Alabama				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
AgA	Angie fine sandy loam, terrace, 0 to 2 percent slopes	All areas are prime farmland	2.6	0.6%
Fa	Falaya fine sandy loam	All areas are prime farmland	15.9	3.3%
Le	Leaf silt loam	Not prime farmland	5.1	1.1%
My	Myatt fine sandy loam	Not prime farmland	149.5	31.4%
OrA	Ora fine sandy loam, 0 to 2 percent slopes	All areas are prime farmland	9.0	1.9%
Pt	Pit, gravel	Not prime farmland	9.6	2.0%
RsA	Ruston fine sandy loam, 0 to 2 percent slopes	All areas are prime farmland	195.1	41.0%
RsB	Ruston fine sandy loam, 2 to 5 percent slopes	All areas are prime farmland	35.9	7.6%
RsC2	Ruston fine sandy loam, 5 to 8 percent slopes, eroded	All areas are prime farmland	5.0	1.1%
RsD2	Ruston fine sandy loam, 8 to 12 percent slopes, eroded	Not prime farmland	10.0	2.1%
RuB	Ruston fine sandy loam, terrace, 0 to 5 percent slopes	Not prime farmland	4.8	1.0%
SaA	Savannah fine sandy loam, 0 to 2 percent slopes	All areas are prime farmland	16.7	3.5%
SfA	Sequatchie fine sandy loam, 0 to 2 percent slopes	All areas are prime farmland	2.0	0.4%
St	Stough fine sandy loam	Not prime farmland	6.0	1.3%
W	Water	Not prime farmland	8.5	1.8%
<b>Totals for Area of Interest</b>			<b>475.7</b>	<b>100.0%</b>

### Description

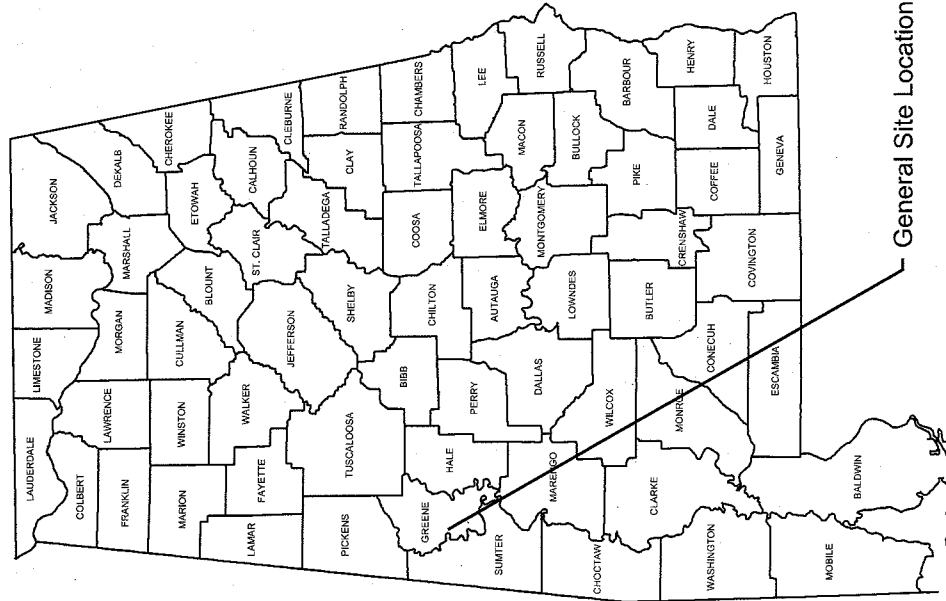
Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

### Rating Options

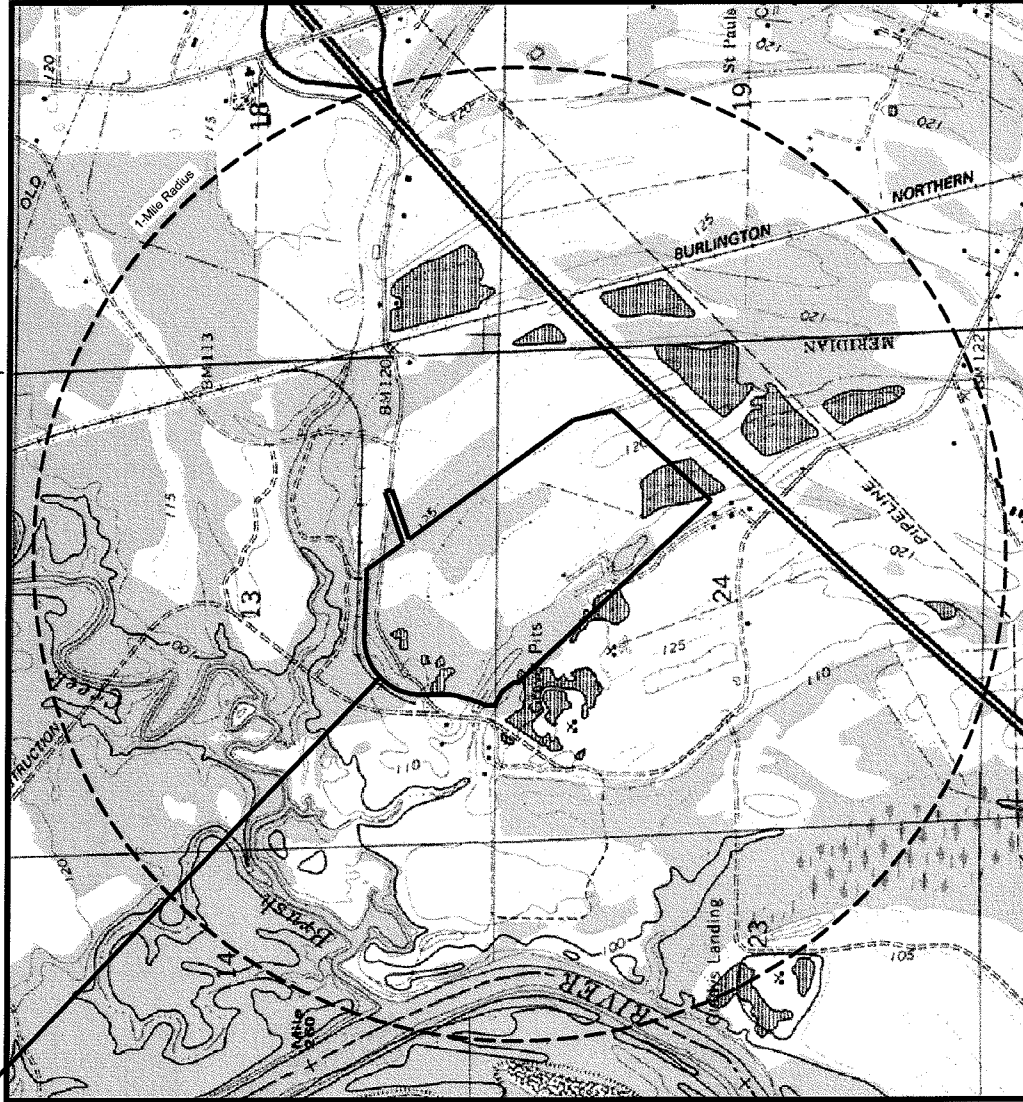
*Aggregation Method:* No Aggregation Necessary

*Tie-break Rule:* Lower

Approximate Site Boundary



General Site Location



Source: USGS Boligee, Ala. 7.5 Minute Quadrangle Map, 1970 (Photorevised 1987)



3516 Greensboro Avenue ■ Tuscaloosa, Alabama 35401  
 205.345.0818 ■ Fax 205.345.0892

TTL PROJECT NO: 600109007

PROJECT DATE: March 22, 2010

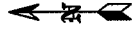
**Figure 1. Site Location and Topographic Map**

S 1/2, Sec. 13 and N 1/2, Sec. 24, T. 21 N., R. 1 W., of the Boligee, Ala. 7.5 Minute Quadrangle Map

Proposed Flagship Site

Crossroads of America Industrial Park

Boligee, Greene County, Alabama



1" = 2000'  
(Approximate)





USDA-----NRCS  
TUSCALOOSA COUNTY RESOURCE SOIL SURVEY OFFICE  
P.O. BOX 861482  
TUSCALOOSA AL 35486-0013

Rural Economic and Community Development \ COSKATA (CELLULOSIC ETHANOL FACILITY)  
GREENE COUNTY ALABAMA

RE: Identification of Important Farmland and Delineation of Executive Order Wetlands:

- Project Lines /SITE ——— 151 ACRES TOTAL
- Prime Farmland ——— 89 ACRES TOTAL
- Wetland ——— 52 ACRES TOTAL
- Other Farmland of Local Importance ——— 10 ACRES TOTAL

The Prime Farmland has been identified along the project area in the color of GREEN

The Wetland has been identified along the project area in the color of BLUE

Other Farmland of local importance has been identified in the color of RED

The completion of this report as directed by Farmland Protection Act Guidelines also meets requirements directed by Departmental regulation 9500-3 Land use Policy Guidelines.

*Milton Tuck* 7/29/10  
Milton Tuck  
Resource Soil Scientist

REMARKS:

U.S. Department of Agriculture

# FARMLAND CONVERSION IMPACT RATING

<b>PART I (To be completed by Federal Agency)</b>	Date Of Land Evaluation Request 7/16/10
Name Of Project Coskata	Federal Agency Involved USDA Rural Development
Proposed Land Use Cellulosic Ethanol Facility	County And State Greene County Alabama

<b>PART II (To be completed by NRCS)</b>	Date Request Received By NRCS 7/22/10
Does the site contain prime, unique, statewide or local important farmland? (If no, the FPPA does not apply -- do not complete additional parts of this form).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
	Acres Irrigated N/A Average Farm Size 429
Major Crop(s) SOYBEANS CORN WHEAT	Farmable Land In Govt. Jurisdiction Acres: 368723 % 90.4
Name Of Land Evaluation System Used LESA	Name Of Local Site Assessment System NONE
	Amount Of Farmland As Defined in FPPA Acres: 133735 % 32.8
	Date Land Evaluation Returned By NRCS 7/29/10

PART III (To be completed by Federal Agency)	Alternative Site Rating			
	Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly	101.0			
B. Total Acres To Be Converted Indirectly	50.0			
C. Total Acres In Site	151.0	0.0	0.0	0.0

PART IV (To be completed by NRCS) Land Evaluation Information				
A. Total Acres Prime And Unique Farmland	0.0	89	Ac	
B. Total Acres Statewide And Local Important Farmland	0.0	0		
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted	0.0	00057		
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value		22.8		

PART V (To be completed by NRCS) Land Evaluation Criterion				
Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)	0	74	0	0

PART VI (To be completed by Federal Agency)	Maximum Points				
Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))					
1. Area In Nonurban Use	15	0			
2. Perimeter In Nonurban Use	10	0			
3. Percent Of Site Being Farmed	20	0			
4. Protection Provided By State And Local Government	20	0			
5. Distance From Urban Builtup Area	15	0			
6. Distance To Urban Support Services	10	0			
7. Size Of Present Farm Unit Compared To Average	10	0			
8. Creation Of Nonfarmable Farmland	10	0			
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10. On-Farm Investments	10	0			
11. Effects Of Conversion On Farm Support Services	10	0			
12. Compatibility With Existing Agricultural Use	10	0			
<b>TOTAL SITE ASSESSMENT POINTS</b>	160	0	0	0	0

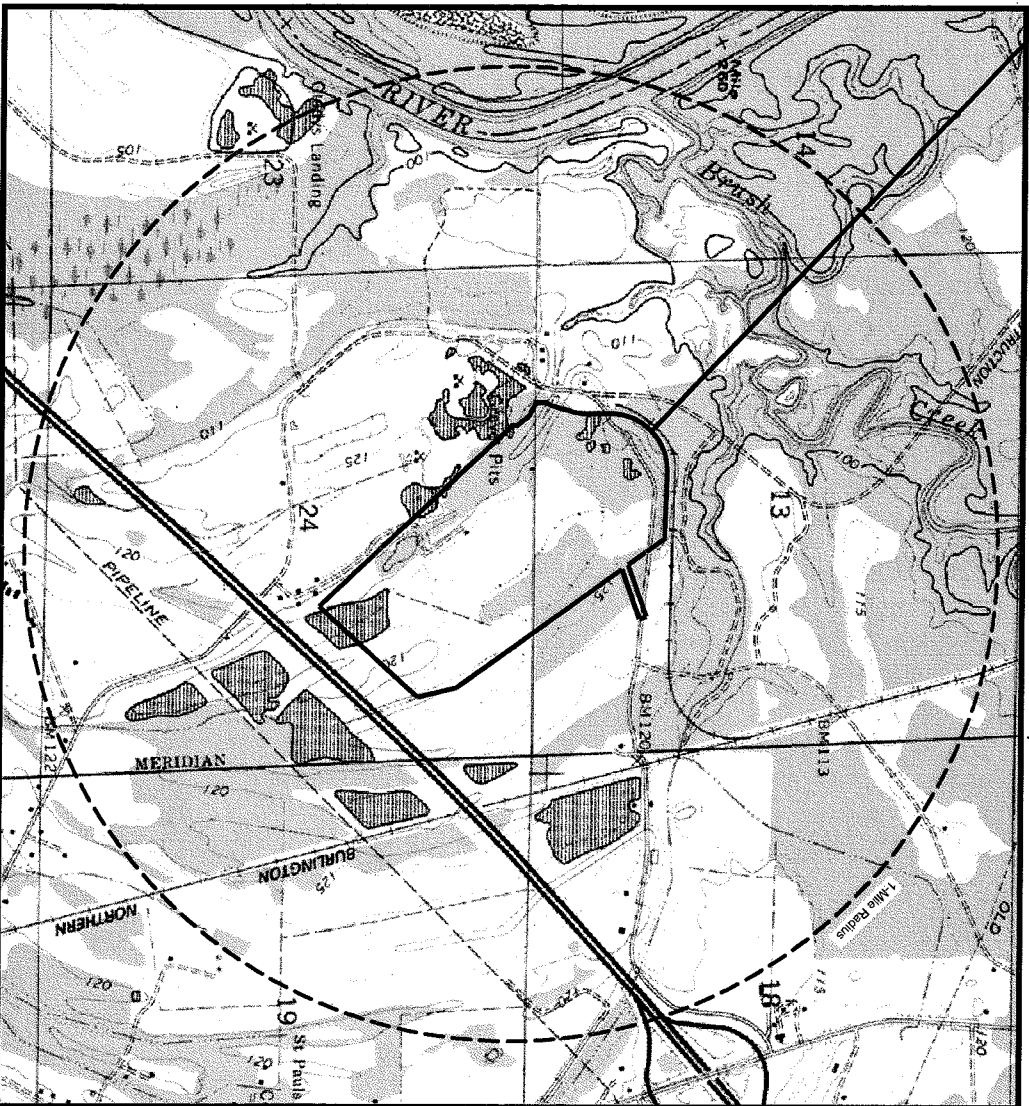
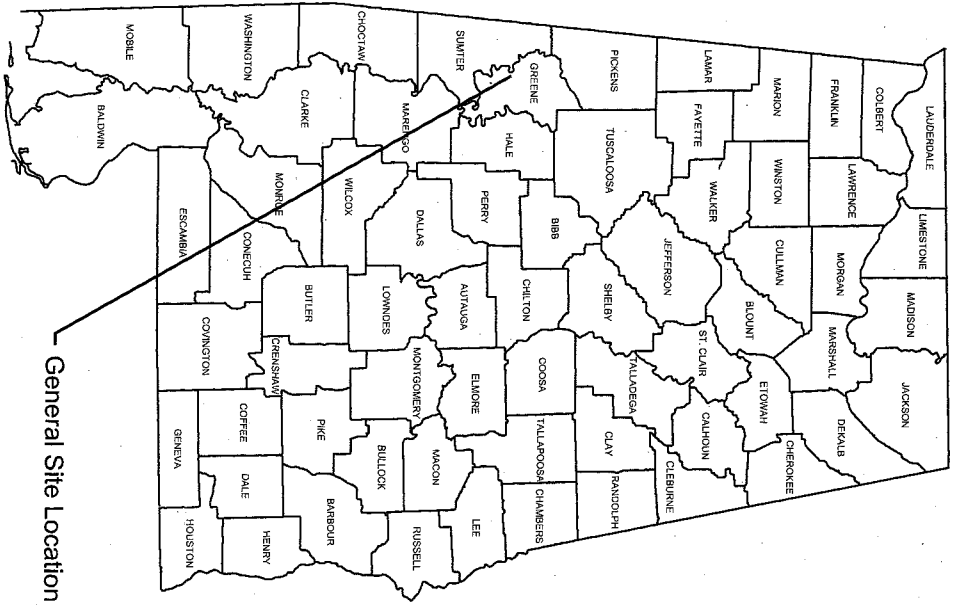
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)	74	OK 100	0	74	0
Total Site Assessment (From Part VI above or a local site assessment)	160	0	0	0	0
<b>TOTAL POINTS (Total of above 2 lines)</b>	260	0	0	0	0

Site Selected:	Date Of Selection	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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Reason For Selection: THE COMPLETION OF THIS REPORT AS DIRECTED BY FARMLAND PROTECTION ACT GUIDELINES ALSO MEETS REQUIREMENTS DIRECTED BY DEPARTMENTAL REGULATION 9500-3 LAND USE POLICY GUIDES.  
 Milton wife RSS  
 7/29/10







Source: USGS Boligee, Ala. 7.5 Minute Quadrangle Map, 1970 (Photorevised 1987)

**Figure 1. Site Location and Topographic Map**

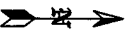
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Boligee, Greene County, Alabama

1" = 2000'  
(Approximate)



3516 Greenbush Avenue ■ Tuscaloosa, Alabama 35401

256.543.0310 ■ Fax 256.543.0392

TTL PROJECT NO.: 600109007

PROJECT DATE: March 22, 2010



# FARMLAND CONVERSION IMPACT RATING

<b>PART I</b> (To be completed by Federal Agency)	Date Of Land Evaluation Request 7/16/10
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Proposed Land Use Cellulosic Ethanol Facility	County And State Greene County Alabama

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Major Crop(s) Soybeans (Corn, Wheat)	Farmable Land In Govt. Jurisdiction Acres: 368,723 % 90	Amount Of Farmland As Defined in FPPA Acres: 133,735 % 33	
Name Of Land Evaluation System Used LESA	Name Of Local Site Assessment System None	Date Land Evaluation Returned By NRCS 7/29/10	

<b>PART III</b> (To be completed by Federal Agency)	Alternative Site Rating			
	Site A	Site B	Site C	Site D
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<b>PART IV</b> (To be completed by NRCS) Land Evaluation Information				
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B. Total Acres Statewide And Local Important Farmland	0.0			
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted	0.0			
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value	22.8			

<b>PART V</b> (To be completed by NRCS) Land Evaluation Criterion Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)	74	0	0	0
--	----	---	---	---

<b>PART VI</b> (To be completed by Federal Agency) Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))	Maximum Points				
1. Area In Nonurban Use	15	15			
2. Perimeter In Nonurban Use	10	10			
3. Percent Of Site Being Farmed	20	12			
4. Protection Provided By State And Local Government	20	0			
5. Distance From Urban Builtup Area	15	15			
6. Distance To Urban Support Services	10	0			
7. Size Of Present Farm Unit Compared To Average	10	0			
8. Creation Of Nonfarmable Farmland	10	10			
9. Availability Of Farm Support Services	5	3			
10. On-Farm Investments	10	1			
11. Effects Of Conversion On Farm Support Services	10	1			
12. Compatibility With Existing Agricultural Use	10	10			
<b>TOTAL SITE ASSESSMENT POINTS</b>	160	77	0	0	0

<b>PART VII</b> (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)	100	74	0	0	0
Total Site Assessment (From Part VI above or a local site assessment)	160	77	0	0	0
<b>TOTAL POINTS (Total of above 2 lines)</b>	260	151	0	0	0

Site Selected:	Date Of Selection	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input type="checkbox"/>
----------------	-------------------	---

Reason For Selection:

Rural Development  
Environmental Justice (EJ) and Civil Rights Impact Analysis (CRIA)  
Certification

1. Applicant's name and proposed project description: Coskata Inc. proposes to construct and operate a new 55 Million Gallon cellulosic ethanol facility within Boligee Alabama

2. Rural Development's loan/grant program/guarantee or other Agency action: RD proposes to provide Coskata Inc. with a \$150,000,000 Loan Note Guarantee for the proposed project.

3.  Attach a map of the proposal's area of effect identifying location or EJ populations, location of the proposal, area of impact or

Attach results of EJ analysis from the Environmental Protection Agency's (EPAs) EnviroMapper with proposed project location and impact footprint delineated.

4. Does the applicant's proposal or Agency action directly, indirectly or cumulatively affect the quality and/or level of services provided to the community?

Yes  No  N/A

5. Is the applicant's proposal or Agency action likely to result in a change in the current land use patterns (types of land use, development densities, etc)?

Yes  No  N/A

6. Does a demographic analysis indicate the applicant's proposal or Agency's action may disproportionately affect a significant minority and/or low-income populations?

Yes  No  N/A

If answer is no, skip to item 12. If answer is yes, continue with items 7 through 12.

7. Identify, describe, and provide location of EJ population \_\_\_\_\_

8. If a disproportionate adverse affect is expected to impact an EJ population, identify type/level of public outreach implemented. \_\_\_\_\_

9. Identify disproportionately high and adverse impacts on EJ populations. \_\_\_\_\_

10. Are adverse impacts appreciably more severe or greater in magnitude than the adverse impacts expected on non-minority/low-income populations?

Yes  No  N/A

11. Are alternatives and/or mitigation required to avoid impacts to EJ populations?

Yes  No  N/A

If yes, describe \_\_\_\_\_

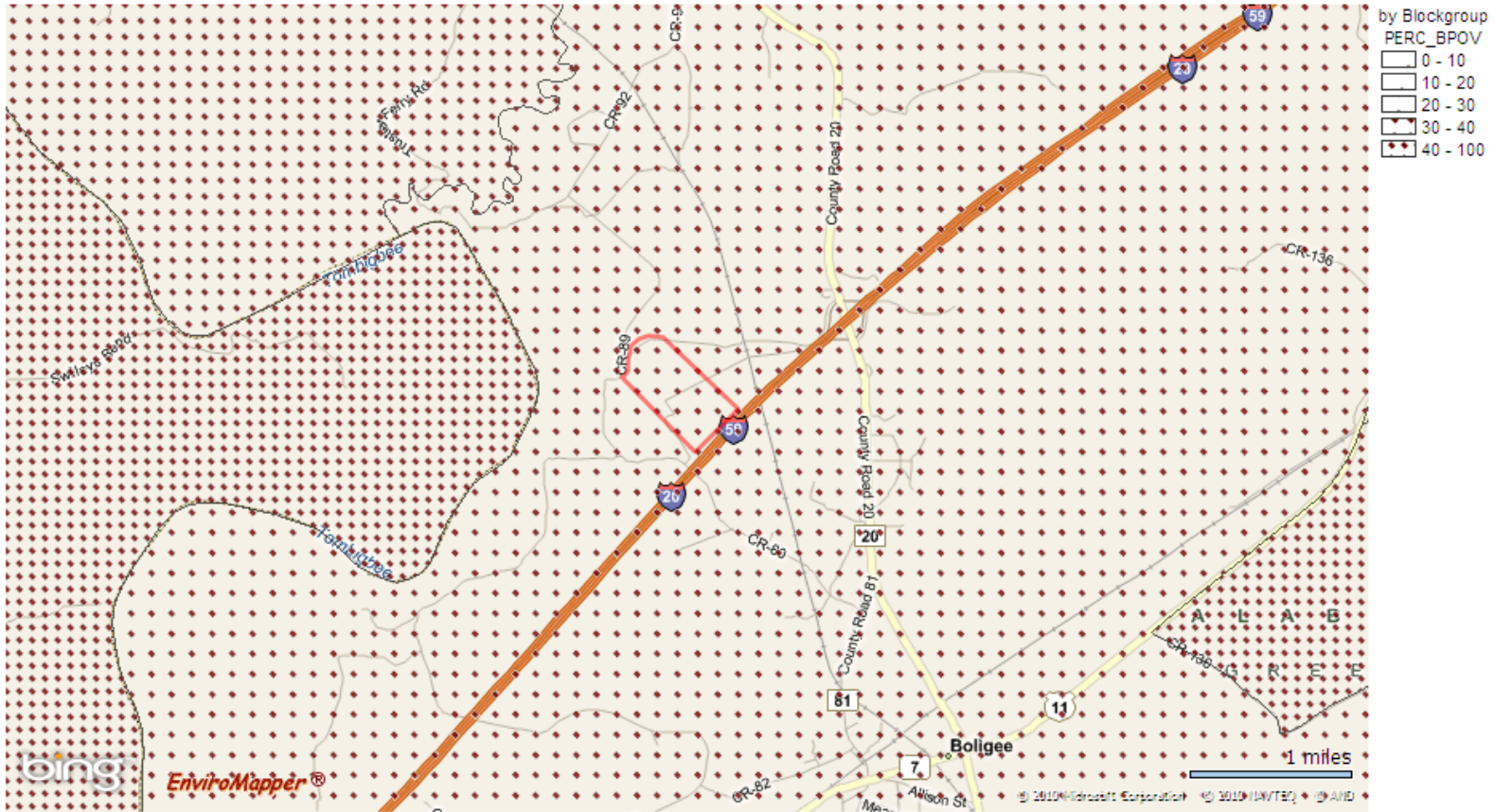
12. I certify that I have reviewed the appropriate documentation and have determined that:

- No major EJ or civil rights impact is likely to result if the proposal is implemented.  
 A major EJ or civil rights impact is likely to result if the proposal is implemented.

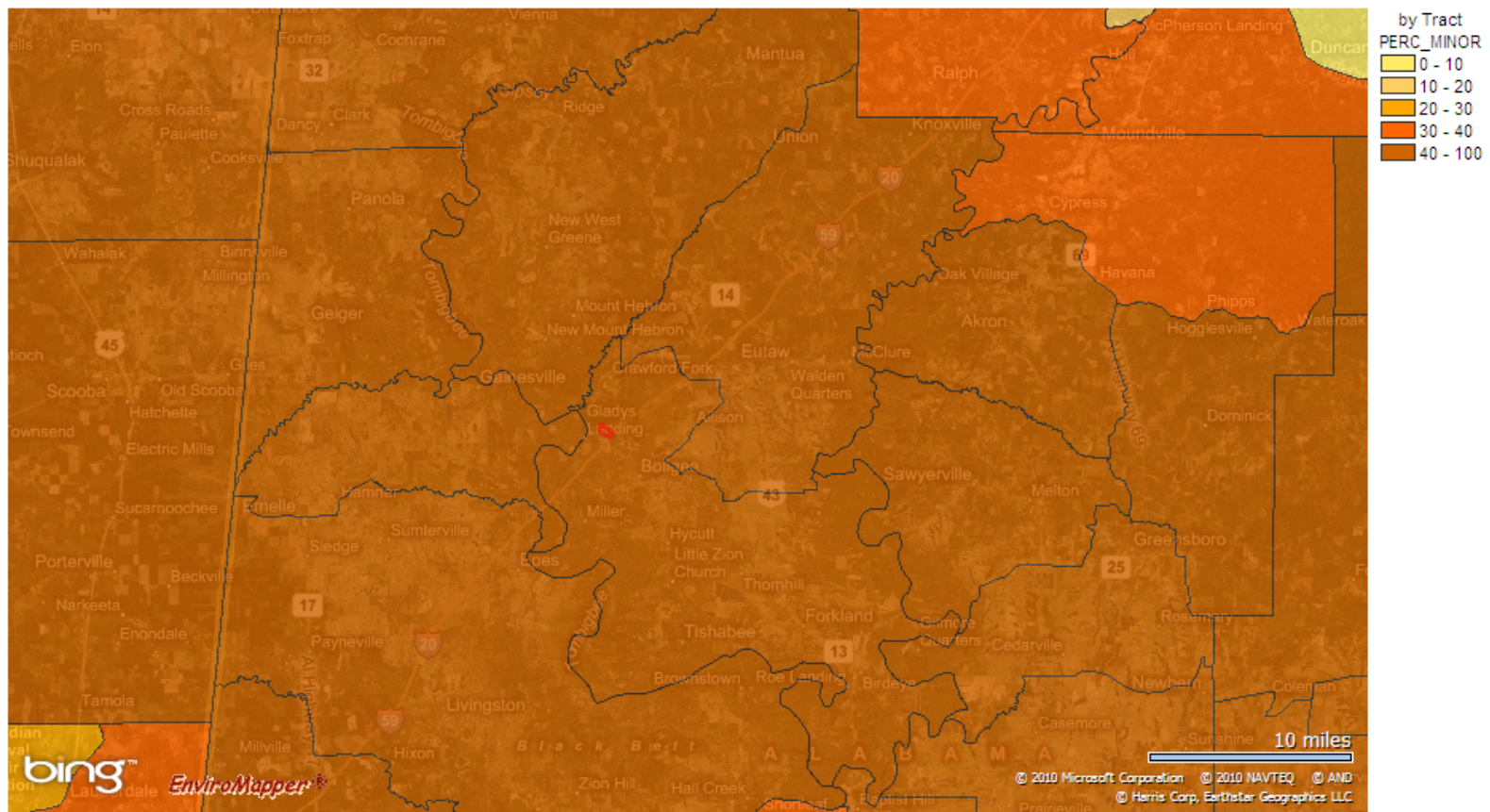
Juliet Dochow  
Name and Title of Certifying Official

September 2, 2010  
Date

**Coskata Inc. - Below Poverty Percent - 30-40% onsite, 40-100% in adjacent areas**

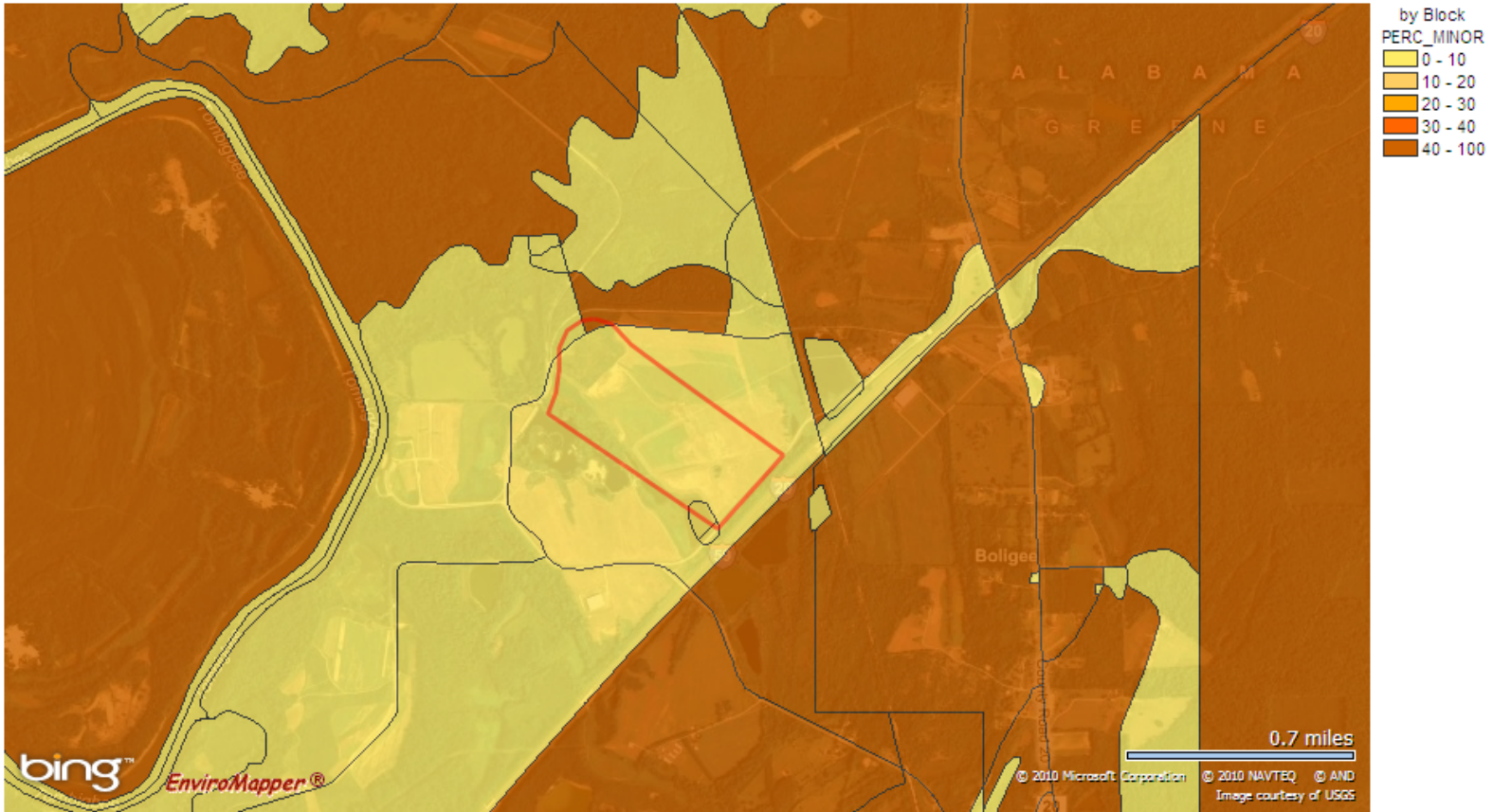


### Coskata Inc. - Percent Minority = 40 -100% adjacent to site





Coskata Inc. - Percent Minority - Local Scale 0-10% to 40-100% Minority







**United States Department of Agriculture  
Rural Development**

July 27, 2010

Elizabeth Ann Brown  
Deputy State Historic Preservation Officer  
Alabama Historic Commission  
468 South Perry Street  
Montgomery, AL 36130-0900

Attn: Greg Rhinehart

Subject: ACH 10-0911  
Section 106 Review of Coskata Cellulosic Ethanol Facility  
U. S. Department of Agriculture, Rural Development  
Boligee, Greene County, AL

Dear Mr. Rhinehart,

The U.S. Department of Agriculture, Rural Development, is reviewing an application from Coskata Inc. for federal funding of a Cellulosic Ethanol Facility Project. The funding would allow Coskata to construct the facility and related infrastructure to be located within the Crossroads of America Industrial Port and Park, specifically on approximately 151 acres within S13, T21N, R1W of the Boligee 7.5 Minute Quadrangle Map (Figure 1). Previously the Alabama Historical Commission (AHC) reviewed this project area within a larger footprint identified as the "Crossroads of America Industrial Park". In a letter dated July 8, 2010, AHC concurred that the proposed activities (which have not changed since that correspondence) would have no adverse effect on cultural resources eligible for or listed on the National Register of Historic Places.

Rural Development has made a determination under Section 106 of the NHPA that this project poses no adverse effects to historic properties (historic or cultural sites listed, or eligible for listing, on the National Register of Historic Places). Rural Development has made this determination of no adverse effect for this undertaking based on a Phase I Cultural Resources survey which included the property that was completed in May, 2010. It is my understanding that you have previously been provided a copy of the Phase I Assessment entitled "A Phase I Cultural Resources Reconnaissance Survey of an Approximate 1,500 Acre Proposed Industrial Park and Wetland Mitigation in Boligee, Green County, Alabama" dated May 2010 (153+pages). Therefore this document is not included in this submission. This survey concluded that no sites were recommended as potentially eligible for the National Register of Historic Places.

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The AHC letter dated July 8, 2010 recommended that a professional archaeologist monitor any ground disturbing activities proposed within 50 meters of the existing cemetery located southwest of the project site. While the cemetery is located on the western boundary of the property, no development is proposed within 400 feet of the cemetery therefore USDA-RD does not anticipate any disturbance or impacts in this area.

**36 CFR Section 800.4(a)(1) – Determine/Document area of potential effect**

The location of the proposed undertaking and the area of potential effect (APE), as defined in Section 800.16(d), are shown on the enclosed USGS Quadrangle Map. The APE is defined as the 150-acre subject property as well as the approximately 8,700 Linear Foot effluent discharge pipe. The legal description of the property is - Longitude 88° 2' 49" West and Latitude 32° 47' 30" North as shown on the enclosed USGS Quadrangle Map. The street address of the property is Industrial Park Road within the Crossroads of America Industrial Park, Greene County, AL.

Please review this finding of effect pursuant to 36 CFR Section 800.5(c) and provide Rural Development with your response within 30 days from receipt of this letter. Please feel free to contact me with any comments or questions at [juliet.bochicchio@wdc.usda.gov](mailto:juliet.bochicchio@wdc.usda.gov) or at 202.205.8242. Please be sure to forward all correspondence to my attention to the address below at **Mail Stop 0761**.

Sincerely,

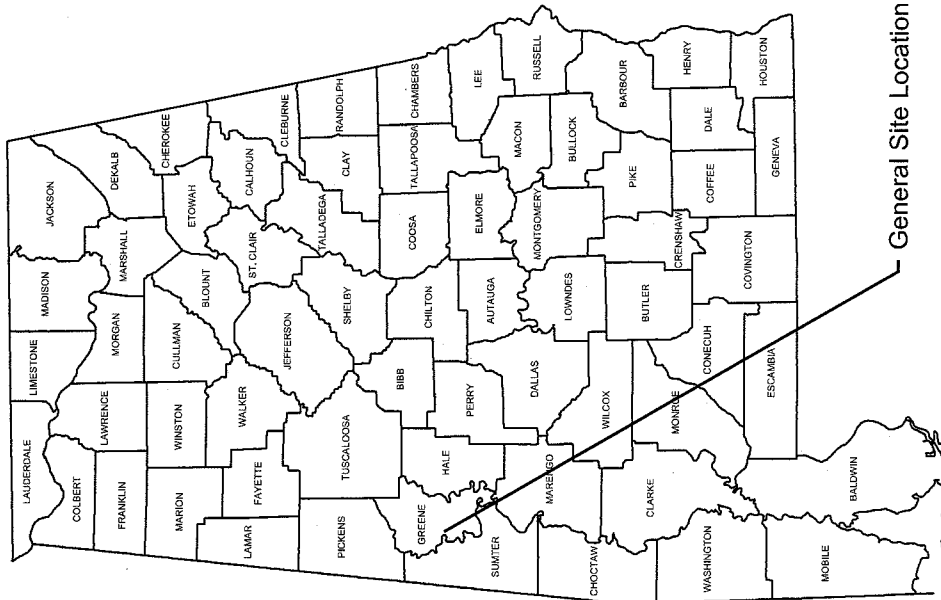


Juliet C. Bochicchio  
Environmental Protection Specialist

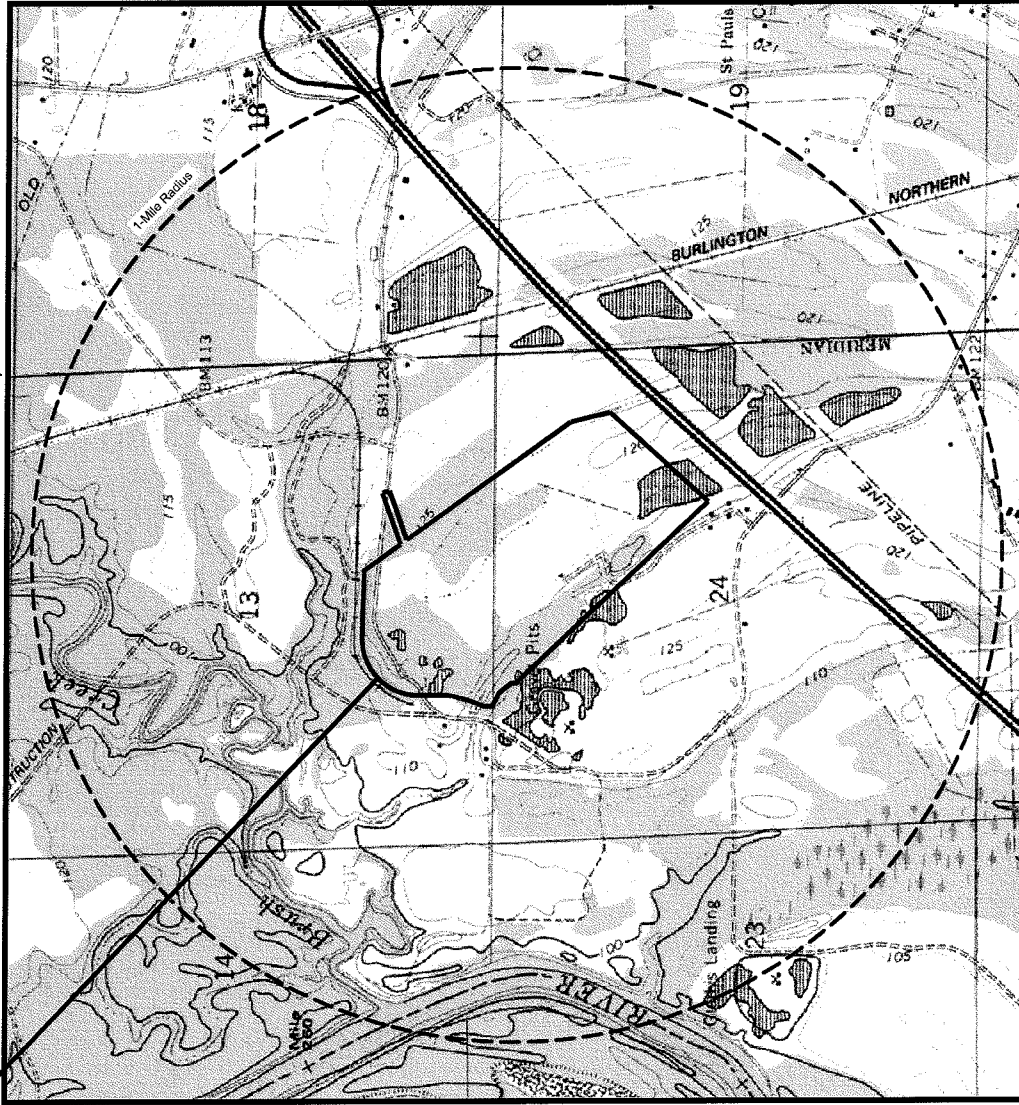
cc: Loula Merkel, Coskata, Inc.

Attachments: 1) Figure 1 - USGS Quadrangle Location Map  
2) Figure 2 - Aerial Photograph of Site  
3) Figure 6 - Contour Map with General Project Footprint

Approximate Site Boundary



General Site Location



Source: USGS Boligee, Ala. 7.5 Minute Quadrangle Map, 1970 (Photorevised 1987)



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205.345.0616 ■ Fax: 205.345.0992

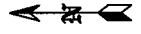
TTL PROJECT NO: 600T09007  
PROJECT DATE: March 22, 2010

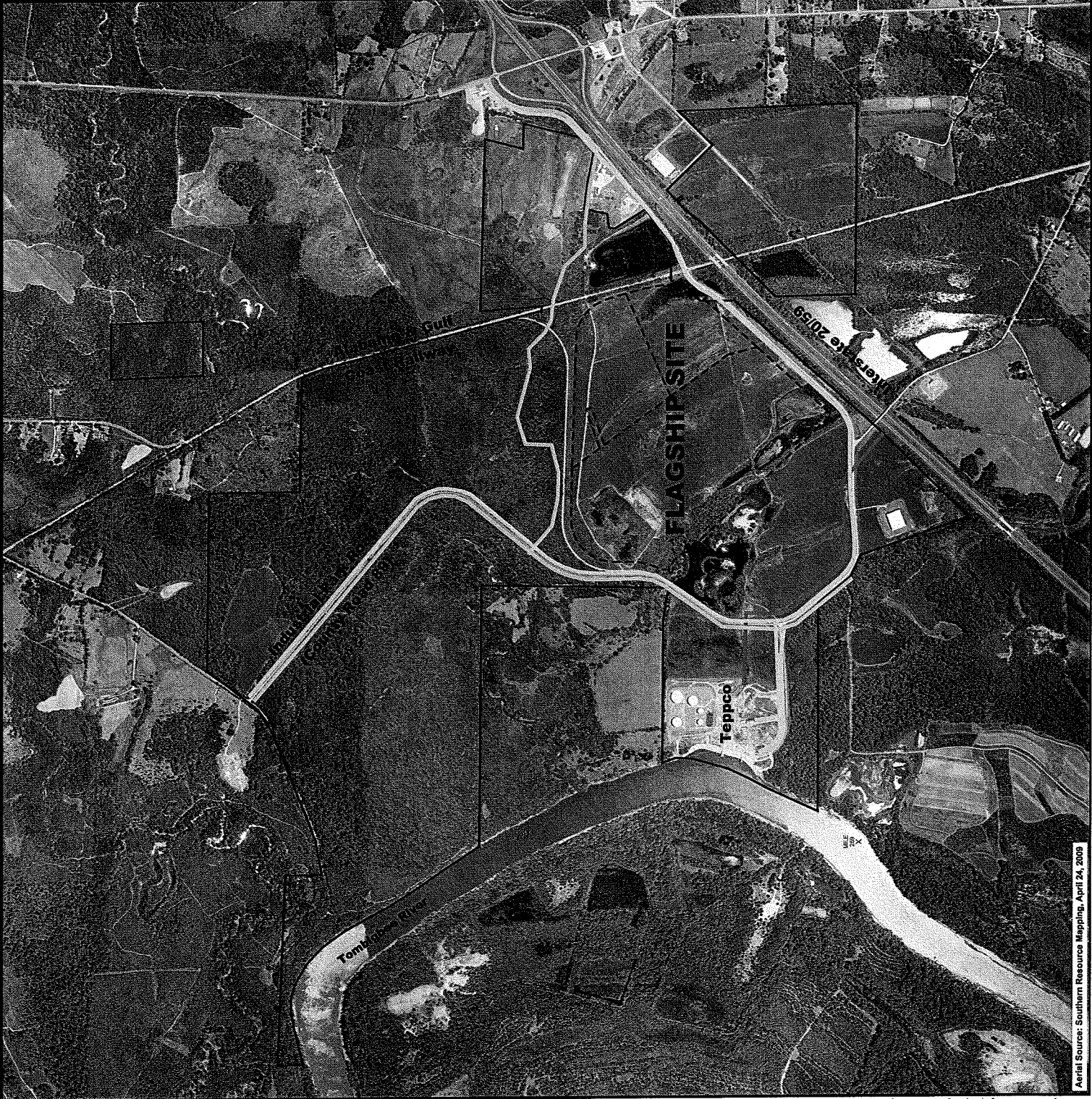
**Figure 1. Site Location and Topographic Map**

S 1/2, Sec. 13 and N 1/2, Sec. 24, T. 21 N., R. 1 W., of the Boligee, Ala. 7.5 Minute Quadrangle Map






Proposed Flagship Site  
Crossroads of America Industrial Park  
Boligee, Greene County, Alabama

1" = 2000'  
(Approximate)





**LEGEND**

-  Draft Park Boundary
-  Approximate Sewer Line Locations
-  Approximate Water Line Locations
-  Approximate Colonial Pipeline Location
-  Draft Flagship Site Boundary

Note: Utility scale and locations are shown exaggerated for clarity



3516 Greensboro Avenue ■ Tuscaloosa, Alabama 35401  
205.345.0816 ■ Fax: 205.345.0992

TTL PROJECT NO: 600109007

PROJECT DATE: July 1, 2010

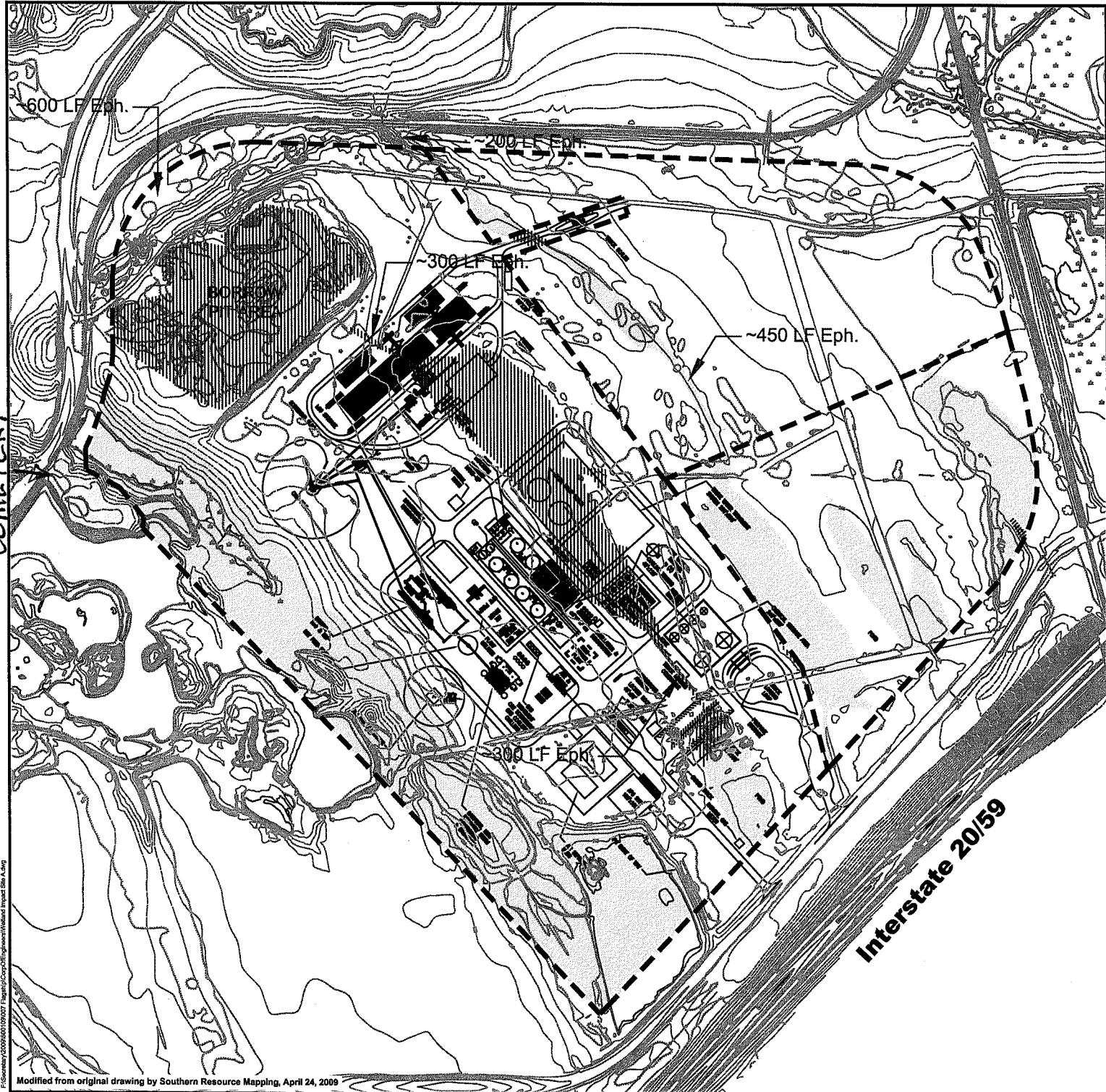
**Figure 2**

**Draft Flagship Site and Industrial Park Property Boundaries with Existing Utilities**

Greene County Industrial Development Board  
Crossroads of America Industrial Park  
Boltige, Greene County, Alabama

Scale: 1" = 2000'





# LEGEND



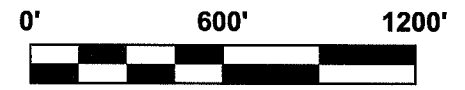
--- Draft Flagship Site Boundary

▨ Delineated Wetland Areas (on 04/12/2010)

Total Area = 72.71 Acres

▨ Wetland Areas Impacted by Design

Total Impact = 22.6 Acres



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TTL PROJECT NO: 600109007  
PROJECT DATE: July 1, 2010

Figure 6

## Flagship Wetlands Impact

Greene County Industrial Development Board  
Crossroads of America Industrial Park  
Boligee, Greene County, Alabama

Scale: 1" = 600'

F:\Secondary\2009\600109007 Flagship\Copy\0912\Wetland Impact Site A.dwg  
Modified from original drawing by Southern Resource Mapping, April 24, 2009





**United States Department of Agriculture  
Rural Development**

July 27, 2010

Attention: Chief A. D. Ellis or Historic Preservation Officer  
Muscogee Creek Nation Official Address  
P.O. Box 580  
Okmulgee, Oklahoma 74447

Dear Chief Ellis or Historic Preservation Officer:

RE: Proposed Coskata Inc. Cellulosic Ethanol Facility, Greene County, Alabama

Coskata Inc. is in the process of making a request for financial assistance to USDA-Rural Development. It is necessary that Rural Development determine compliance with the requirements of the environmental assessment process according to their National Environmental Policy Act (NEPA) regulations on any project financed by the agency.

Attached are a location map and a description of the proposed project for which financial assistance has been requested. We would appreciate your advice as to whether the project would affect any regulations under your jurisdiction as well as provide us other information concerning the project site that you may have available. We respectfully request a response from your agency within 30 days of receipt of this letter. If we have already contacted your government regarding this project, would you please be so kind as to respond directly to this letter so that we may document for Rural Development purposes.

Thank you for your time,

Sincerely,

A handwritten signature in cursive script that reads "Juliet Bochicchio".

Juliet Bochicchio, Environmental Protection Specialist  
USDA Rural Development

Attachment 1 – Description of the Project

Attachment 2 – Figure 1. Project Vicinity Map (7.5 minute Quadrangle Map)

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1400 Independence Avenue, S.W., Washington, DC 20250-9410 or call (800) 795-3272 (Voice) or (202) 720-6382 (TDD).

Mail Stop 0761

**Generalized Project Description**  
**Proposed Cellulosic Ethanol Facility**  
**Coskata, Inc.**  
**Greene County, Alabama**  
**July 2010**

The Project Flagship cellulosic ethanol facility (“Flagship” or the “Project”) is proposed for construction in Boligee, Alabama. The purpose of the project is to produce cellulosic ethanol that will contribute to meeting the requirements of the Renewable Fuel Standard established in the Energy Independence and Security Act of 2007. The proposed capacity of the facility that will convert wood biomass into cellulosic ethanol is estimated to be 60 million gallons of cellulosic ethanol. Flagship proposes the use of locally sourced woody biomass, expected to consist predominantly of Southern Pine and residues, for the ethanol production.

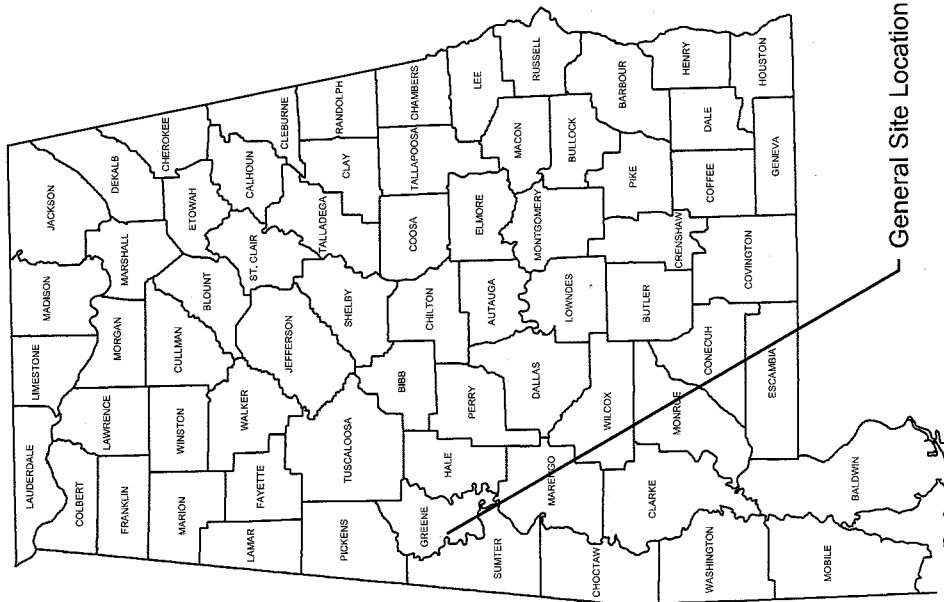
The planned location of Project Flagship is an industrial park and port in Greene County in west central Alabama within the metropolitan area of Tuscaloosa, Alabama. Specifically, the identified site is located within the Crossroads of America Port and Park located southwest of Exit 32 along Interstate 20/59 in Boligee and is bordered by the Tombigbee River along the west and Greene County Road 92 along the north. Brush Creek flows diagonally through the park and empties into the Tombigbee River in the southwest corner. Alabama and Gulf Coast Railroad generally borders the park to the east. Figure 1 shows the location of the proposed facility.

The cellulosic ethanol facility would include the following components:

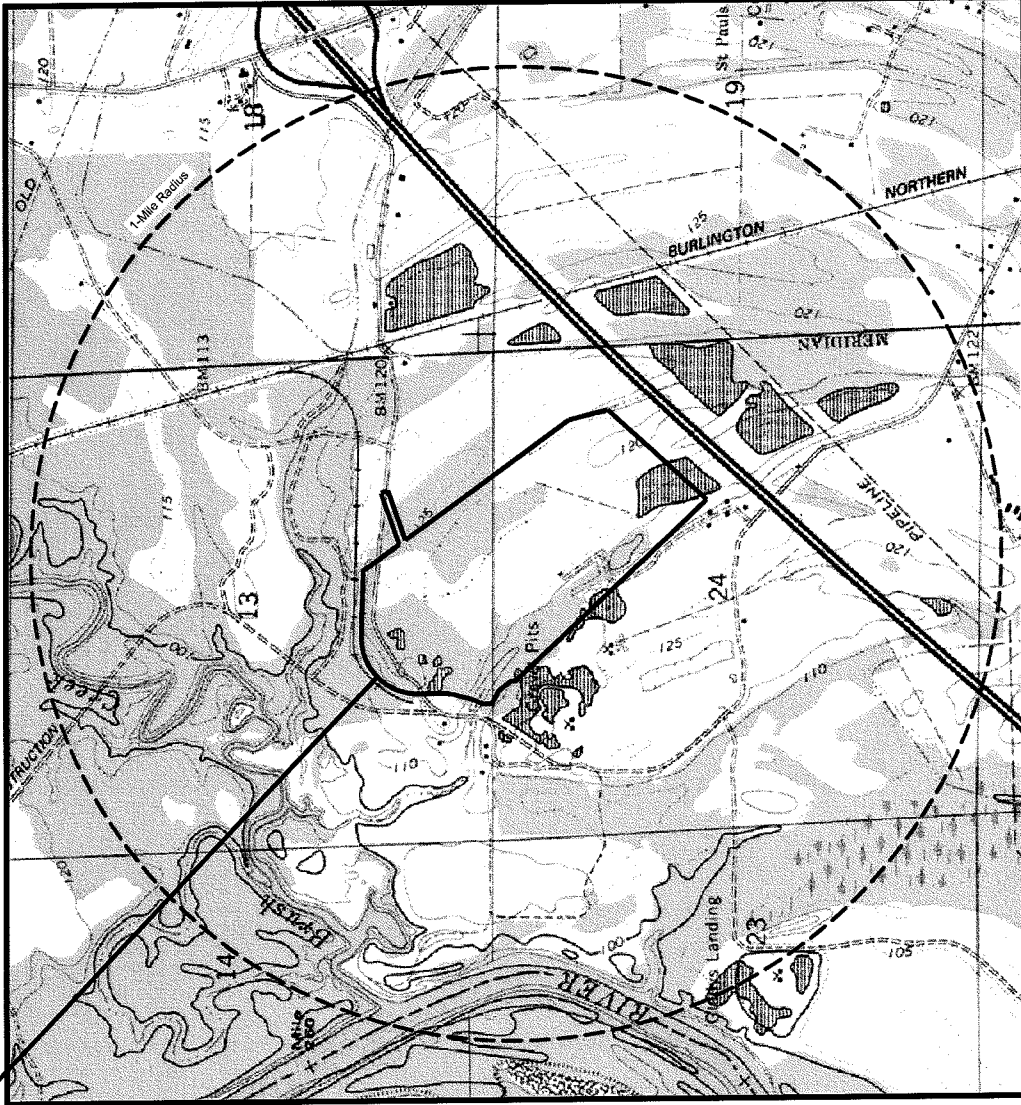
1. Gasification. A non-food cellulosic feedstock is decomposed to produce synthesis gas (“syngas”) made up of Carbon Monoxide (CO), Hydrogen (H<sub>2</sub>) and CO<sub>2</sub>.
2. Syngas Fermentation. Coskata’s proprietary microorganisms convert the syngas into cellulosic ethanol in our bioreactor system. The ethanol specific yield will be the highest in the industry, making the cellulosic biofuel directly competitive with gasoline.
3. Separation. Ethanol is separated from water via commercially available distillation and molecular sieve technology.
4. Loading areas, Chip Drying facilities, maintenance buildings, storage areas, and associated infrastructure.

The City of Eutaw will provide the facility with an adequate water supply and sanitary sewer capacities. An NPDES permit issued by Alabama Department of Environmental Management (ADEM) will be required for discharge of treated process water and collected stormwater to surface waters. Air Quality and Solid Waste Permits will also be obtained from ADEM. A U.S. Army Corps of Engineers (USACE) Permit will be obtained for proposed impact to onsite wetlands. The project will also be reviewed for any potential impact to other biological, historic, farmland, or floodplain resources.

Approximate Site Boundary



General Site Location



Source: USGS Boligee, Ala. 7.5 Minute Quadrangle Map, 1970 (Photorevised 1987)

0' 2000'



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205.345.0916 ■ Fax: 205.345.0992

TTL PROJECT NO: 600109007  
PROJECT DATE: March 22, 2010

**Figure 1. Site Location and Topographic Map**

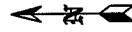
S 1/2, Sec. 13 and N 1/2, Sec. 24, T. 21 N., R. 1 W., of the Boligee, Ala. 7.5 Minute Quadrangle Map

Proposed Flagship Site

Crossroads of America Industrial Park

Boligee, Greene County, Alabama

1" = 2000'  
(Approximate)





United States Department of Agriculture  
Rural Development

July 27, 2010

Attention: Robert Thrower, THPO  
Poarch Band of Creek Indians  
5811 Jack Springs Road  
Atmore, Alabama 36502

Dear Robert Thrower:

RE: Proposed Coskata Inc. Cellulosic Ethanol Facility, Greene County, Alabama

Coskata Inc. is in the process of making a request for financial assistance to USDA-Rural Development. It is necessary that Rural Development determine compliance with the requirements of the environmental assessment process according to their National Environmental Policy Act (NEPA) regulations on any project financed by the agency.

Attached are a location map and a description of the proposed project for which financial assistance has been requested. We would appreciate your advice as to whether the project would affect any regulations under your jurisdiction as well as provide us other information concerning the project site that you may have available. We respectfully request a response from your agency within 30 days of receipt of this letter. If we have already contacted your government regarding this project, would you please be so kind as to respond directly to this letter so that we may document for Rural Development purposes.

Thank you for your time,

Sincerely,

  
Juliet Bochicchio, Environmental Protection Specialist  
USDA Rural Development

Attachment 1 – Description of the Project

Attachment 2 – Figure 1. Project Vicinity Map (7.5 minute Quadrangle Map)

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*Mail  
STOP 0761*

**Generalized Project Description**  
**Proposed Cellulosic Ethanol Facility**  
**Coskata, Inc.**  
**Greene County, Alabama**  
**July 2010**

The Project Flagship cellulosic ethanol facility (“Flagship” or the “Project”) is proposed for construction in Boligee, Alabama. The purpose of the project is to produce cellulosic ethanol that will contribute to meeting the requirements of the Renewable Fuel Standard established in the Energy Independence and Security Act of 2007. The proposed capacity of the facility that will convert wood biomass into cellulosic ethanol is estimated to be 60 million gallons of cellulosic ethanol. Flagship proposes the use of locally sourced woody biomass, expected to consist predominantly of Southern Pine and residues, for the ethanol production.

The planned location of Project Flagship is an industrial park and port in Greene County in west central Alabama within the metropolitan area of Tuscaloosa, Alabama. Specifically, the identified site is located within the Crossroads of America Port and Park located southwest of Exit 32 along Interstate 20/59 in Boligee and is bordered by the Tombigbee River along the west and Greene County Road 92 along the north. Brush Creek flows diagonally through the park and empties into the Tombigbee River in the southwest corner. Alabama and Gulf Coast Railroad generally borders the park to the east. Figure 1 shows the location of the proposed facility.

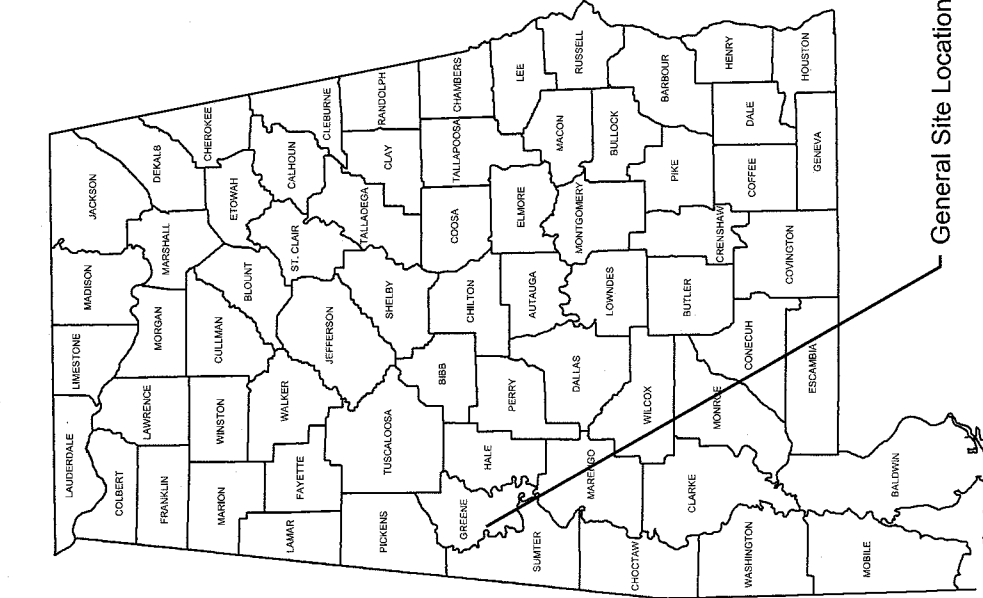
The cellulosic ethanol facility would include the following components:

1. Gasification. A non-food cellulosic feedstock is decomposed to produce synthesis gas (“syngas”) made up of Carbon Monoxide (CO), Hydrogen (H<sub>2</sub>) and CO<sub>2</sub>.
2. Syngas Fermentation. Coskata’s proprietary microorganisms convert the syngas into cellulosic ethanol in our bioreactor system. The ethanol specific yield will be the highest in the industry, making the cellulosic biofuel directly competitive with gasoline.
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4. Loading areas, Chip Drying facilities, maintenance buildings, storage areas, and associated infrastructure.

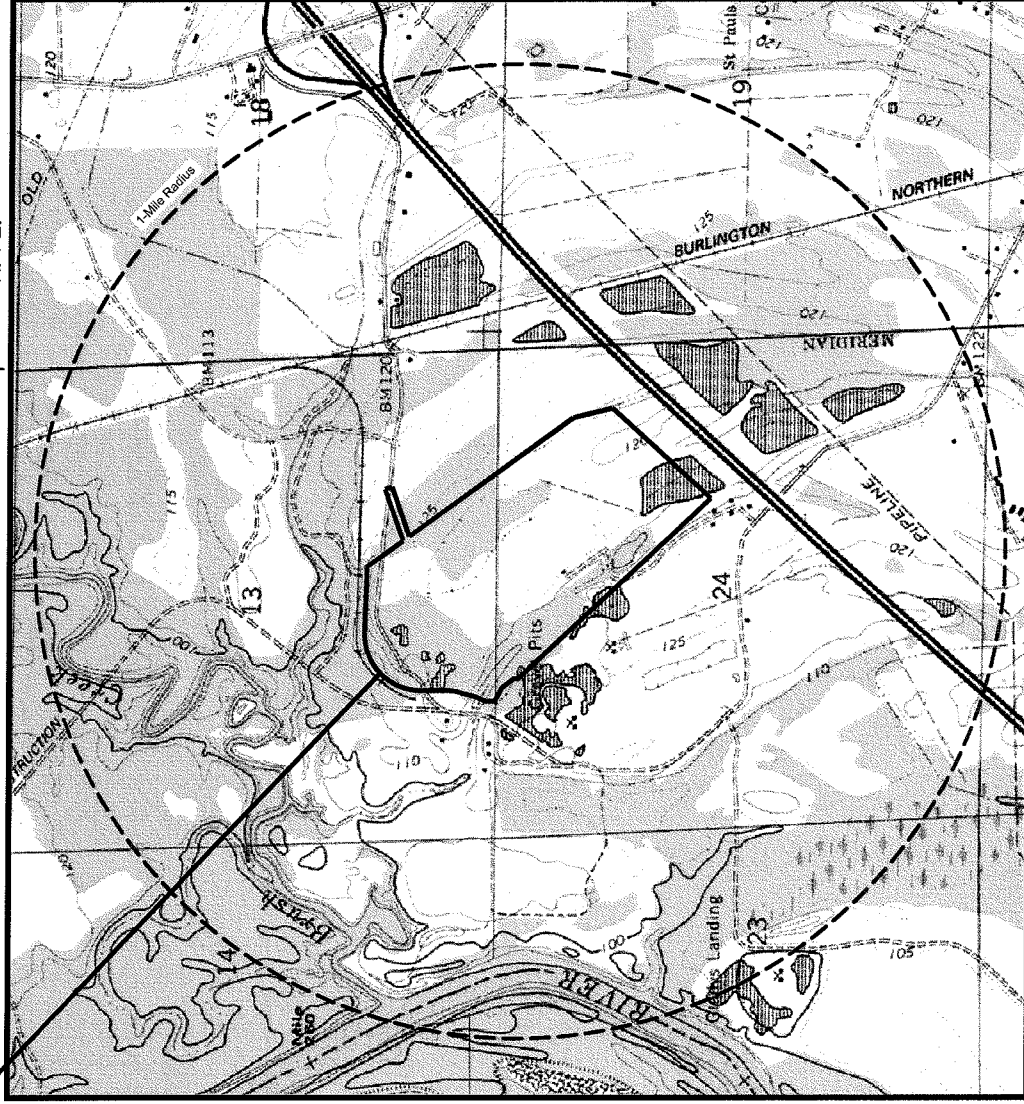
The City of Eutaw will provide the facility with an adequate water supply and sanitary sewer capacities. An NPDES permit issued by Alabama Department of Environmental Management (ADEM) will be required for discharge of treated process water and collected stormwater to surface waters. Air Quality and Solid Waste Permits will also be obtained from ADEM. A U.S. Army Corps of Engineers (USACE) Permit will be obtained for proposed impact to onsite wetlands. The project will also be reviewed for any potential impact to other biological, historic, farmland, or floodplain resources.



Approximate Site Boundary



General Site Location



Source: USGS Boligee, Ala. 7.5 Minute Quadrangle Map, 1970 (Photorevised 1987)



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 205.345.0816 ■ Fax 205.345.0892

TTL PROJECT NO: 600109007  
 PROJECT DATE: March 22, 2010

**Figure 1. Site Location and Topographic Map**

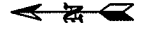
S 1/2, Sec. 13 and N 1/2, Sec. 24, T. 21 N., R. 1 W., of the Boligee, Ala. 7.5 Minute Quadrangle Map

Proposed Flagship Site

Crossroads of America Industrial Park

Boligee, Greene County, Alabama

1" = 2000'  
 (Approximate)



## Loula Merkel

---

**From:** Bob White [bwhite@ttlusa.com]  
**Sent:** Thursday, July 01, 2010 3:53 PM  
**To:** Loula Merkel; Russ Read  
**Cc:** Jim Bambarger  
**Subject:** Cultural Review

Loula, Russ,  
I spoke to Greg Rhinehart with the Alabama Historic Commission. He stated that the Cultural Survey is currently being reviewed for historic structures impacts and he will finish the archaeological review next week. Greg will issue a letter by next Friday, July 9. He stated that he would call if there are impacts concerns.

Greg restated that the review is in accordance with Section 106 of the National Historic Preservation Act, and that the review by the AHC is consistent with federal NEPA requirements for USDA actions.

Sincerely,  
Bob

Bob White  
Project Manager  
ph (229)432-5805  
fax (229)432-7018  
[www.ttlinc.com](http://www.ttlinc.com)



STATE OF ALABAMA  
ALABAMA HISTORICAL COMMISSION  
468 SOUTH PERRY STREET  
MONTGOMERY, ALABAMA 36130-0900

FRANK W. WHITE  
EXECUTIVE DIRECTOR

July 8, 2010

TEL: 334-242-3184  
FAX: 334-240-3477

Robert M. White  
TTL  
3516 Greensboro Avenue  
Tuscaloosa, Alabama 35401

Re: AHC 10-0911  
Crossroads of America Industrial Park  
Green County, Alabama

Dear Mr. White:

Upon review of the cultural resource assessment conducted by the Office of Archaeological Research, we have determined that project activities will have no adverse effect on cultural resources eligible for or listed on the National Register of Historic Places. Therefore, we concur with the proposed project activities. However, if there are any future ground disturbing activities within 50 meters of the cemetery, a professional archaeologist should monitor the activities.

Also, should artifacts or archaeological features be encountered during project activities, work shall cease and our office shall be consulted immediately. Artifacts are objects made, used or modified by humans. These include but are not limited to arrowheads, broken pieces of pottery or glass, stone implements, metal fasteners or tools, etc. Archaeological features are stains in the soil that indicate disturbance by human activity. Some examples are postholes, building foundations, trash pits and even human burials. This stipulation shall be placed on the construction plans to insure contractors are aware of it.

We appreciate your efforts on this project. Should you have any questions, please contact Greg Rhinehart at (334) 230-2662. Please have the AHC tracking number referenced above available and include it with any correspondence.

Truly yours,

Elizabeth Ann Brown  
Deputy State Historic Preservation Officer

EAB/GCR/gcr



geotechnical • analytical • materials • environmental

3516 Greensboro Avenue (35401)  
Drawer 1128  
Tuscaloosa, Alabama 35403  
Telephone 205.345.0816  
Facsimile 205.345.0992  
www.TTLUSA.com

Decatur . Montgomery . Tuscaloosa ALABAMA  
Albany . Valdosta GEORGIA  
Nashville TENNESSEE

June 21, 2010

Ms. Amanda Hill  
Alabama Historic Commission  
468 South Perry Street  
Montgomery, Alabama 36130-0900

Re: Coskata Flagship Project  
Crossroads of America Industrial Park  
Boligee, Greene County, Alabama

Dear Ms. Hill:

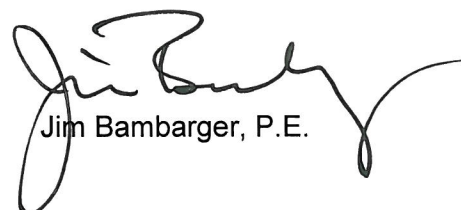
TTL, Inc. (TTL) appreciates your review of the Phase I survey report of 1500 acres in association with the proposed development in the Greene County Industrial Park, Greene County, Alabama, submitted by Sam Mizelle, Office of Archaeological Research, University of Alabama Museums. Although Mr. Mizelle's June 8, 2010 cover letter submitted with the Phase I report indicated potential work in close proximity to a historic cemetery, you can see through review of the enclosed Figure 3 that the nearest proposed work is a buried process water outfall line in the Greene County roadway right-of-way. Additionally, Figure 3 shows a modification to the boundaries for the Coskata property purchase around the periphery of the cemetery. This would ensure that the cemetery stays completely within the boundaries of the property owned by the Greene County Development Board. Coskata property will remain 15 feet away from the cemetery boundary. Other cultural resources found within or immediately adjacent to the Flagship boundary and outfall line include 1Gr114, 1Gr115, 1Gr159, and 1Gr162. None of the archaeological sites are recommended as potentially NRHP eligible. No other land-disturbing activities are planned in the near vicinity of the historic cemetery.

As stated in Mr. Mizelle's letter, TTL requests review of the subject Phase I archaeological survey and concurrence with the findings of no potential impact to cultural resources within the approximately 235-acre Flagship parcel of land. We have attached Figures 1, 2, and 3 showing the Flagship parcel with cultural resources findings for your review.

If you have questions concerning this review request, please contact Bob White at 229-432-805, or Jim Bambarger at 205-345-0816.

Sincerely,  
TTL, Inc.

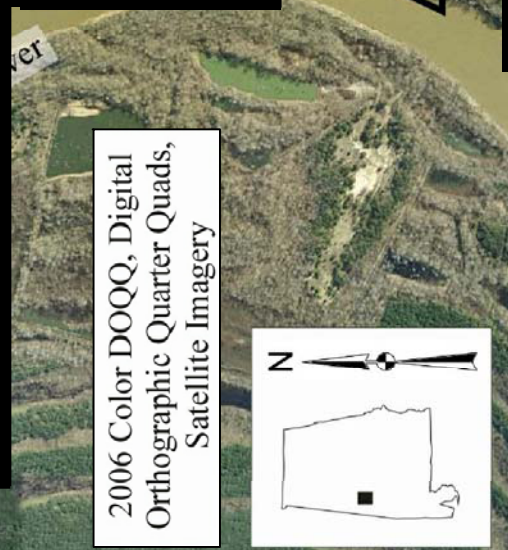
  
Robert M. White (by Rgm)

  
Jim Bambarger, P.E.



# Survey Area

- Shovel Test
- Stream/Drainage
- Survey Area
- Wetland Area
- Previously Recorded Sites
- Newly Recorded Sites
- Pond
- Private Property
- Inundated Area



2006 Color DOQQ, Digital Orthographic Quarter Quads, Satellite Imagery

**TTT**  
 3516 Greensboro Avenue ■ Tuscaloosa, Alabama 35401  
 205.345.0816 ■ Fax 205.345.0992  
 TTL PROJECT NO: 600110007  
 PROJECT DATE: June 8, 2010

**Figure 1. Flagship Property and Cultural Resources**  
 Crossroads of America Industrial Park  
 Boligee, Greene County, Alabama



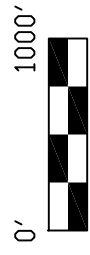


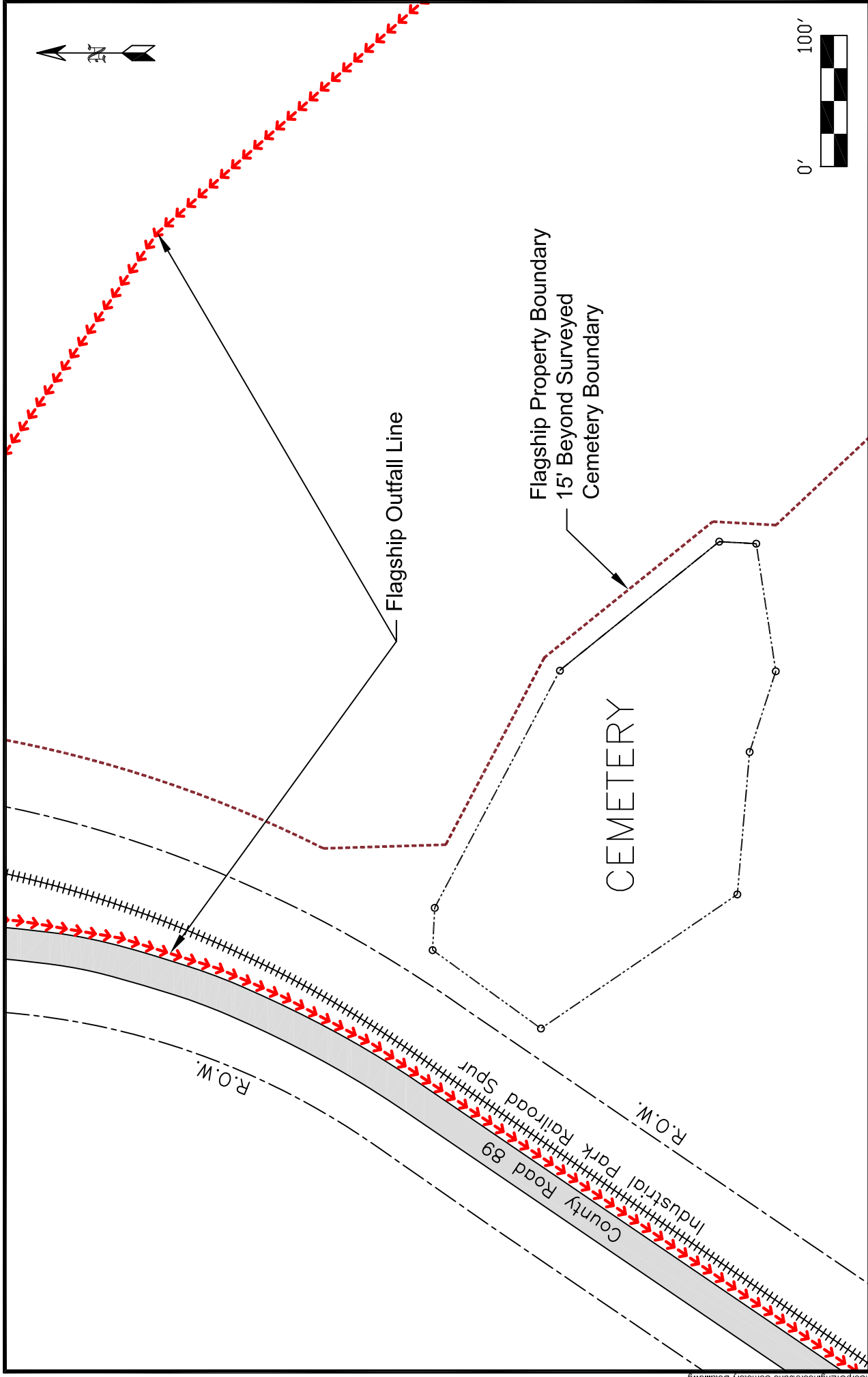
3516 Greensboro Avenue ■ Tuscaloosa, Alabama 35401  
 205.345.0816 ■ Fax 205.345.0892

TTL PROJECT NO: 600110007  
 PROJECT DATE: June 8, 2010

## Figure 2. Flagship Property and Cultural Resources

Crossroads of America Industrial Park  
 Boligee, Greene County, Alabama





**Figure 3. Flagship Property and Adjacent Cemetery**  
 Crossroads of America Industrial Park  
 Boligee, Greene County, Alabama

**TTL**

3516 Greensboro Avenue ■ Tuscaloosa, Alabama 35401  
 205.345.0816 ■ Fax 205.345.0992

TTL PROJECT NO: 600110007  
 PROJECT DATE: June 17, 2010

June 8, 2010



Ms. Amanda Hill  
Alabama Historic Commission  
468 South Perry Street  
Montgomery, Alabama 36130-0900

Re: Crossroads of America Industrial Park  
Boligee, Green County, Alabama

Dear Ms. Hill,

Please find the enclosed report of our Phase I survey of 1500 acres in association with the proposed development in Greene County, Alabama.

While there are future development plans for the portions of the entire project area, the initial development plans, which include 235 acres included in the flagship boundary and approximately 8,350 feet of outfall line to the river are the primary concern of our client at this time (as seen in the figures found in appendix C). It is our understanding that there are USDA grant monies involved with the initial development plans which require AHC concurrence as part of the grant application.

Cultural resources found within or immediately adjacent to the flagship boundary and outfall line include 1Gr114, 1Gr115, 1Gr159, 1Gr 162, and a historic cemetery. None of the archaeological sites are recommended as potentially NRHP eligible. The cemetery is fenced, and is likely contained within that boundary, as well as being well defined by the landform. However, in order to ensure that no burials are disturbed, we would suggest any ground disturbing activities within 50 meters of the cemetery as currently defined be monitored by a professional archaeologist.

Three sites within the larger project area are considered potentially eligible for the NRHP (1Gr160, 1Gr161, and 1Gr166). Additional testing or avoidance of these sites is recommended.

Please feel free to contact me by email or at (205) 371-8708 if I can provide any additional information or otherwise be of assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Mizelle".

Sam Mizelle  
Office of archaeological Research  
University of Alabama Museums

Enclosure: OAR Project 10-153 survey report

July 16, 2010

Mr. William Pierson  
US Fish and Wildlife Service (USFWS)  
1208-B Main St.  
Daphane, AL 36526-4419

RE: Proposed Coskata Inc. Cellulosic Ethanol Facility, Greene County, Alabama

Dear Mr. Pierson:

Coskata Inc. is in the process of making a request for financial assistance to USDA-Rural Development. It is necessary that Rural Development determine compliance with the requirements of the environmental assessment process according to their National Environmental Policy Act (NEPA) regulations on any project financed by the agency.

Attached are a location map and a description of the proposed project for which financial assistance has been requested. We would appreciate your advice as to whether the project would affect any regulations under your jurisdiction as well as provide us other information concerning the project site that you may have available. We respectfully request a response from your agency within 30 days of receipt of this letter. If we have already contacted your agency regarding this project, would you please be so kind as to respond directly to this letter so that we may document our correspondence for Rural Development purposes.

Thank you for your time.

Sincerely,  
  
Loula Merkel  
Director of Government Affairs

cc: Juliet Bochicchio, USDA Rural Development

Attachment 1 – Description of the Project

Attachment 2 – Figure 1. Project Vicinity Map (7.5 minute Quadrangle Map)

**Generalized Project Description  
Proposed Cellulosic Ethanol Facility  
Coskata, Inc.  
Greene County, Alabama  
July 2010**

The Project Flagship cellulosic ethanol facility (“Flagship” or the “Project”) is proposed for construction in Boligee, Alabama. The purpose of the project is to produce cellulosic ethanol that will contribute to meeting the requirements of the Renewable Fuel Standard established in the Energy Independence and Security Act of 2007. The proposed capacity of the facility that will convert wood biomass into cellulosic ethanol is estimated to be 55 million gallons of cellulosic ethanol. Flagship proposes the use of locally sourced woody biomass, expected to consist predominantly of Southern Pine and residues, for the ethanol production.

The planned location of Project Flagship is an industrial park and port in Greene County in west central Alabama within the metropolitan area of Tuscaloosa, Alabama. Specifically, the identified site is located within the Crossroads of America Port and Park located southwest of Exit 32 along Interstate 20/59 in Boligee and is bordered by the Tombigbee River along the west and Greene County Road 92 along the north. Brush Creek flows diagonally through the park and empties into the Tombigbee River in the southwest corner. Alabama and Gulf Coast Railroad generally borders the park to the east. Figure 1 shows the location of the proposed facility.

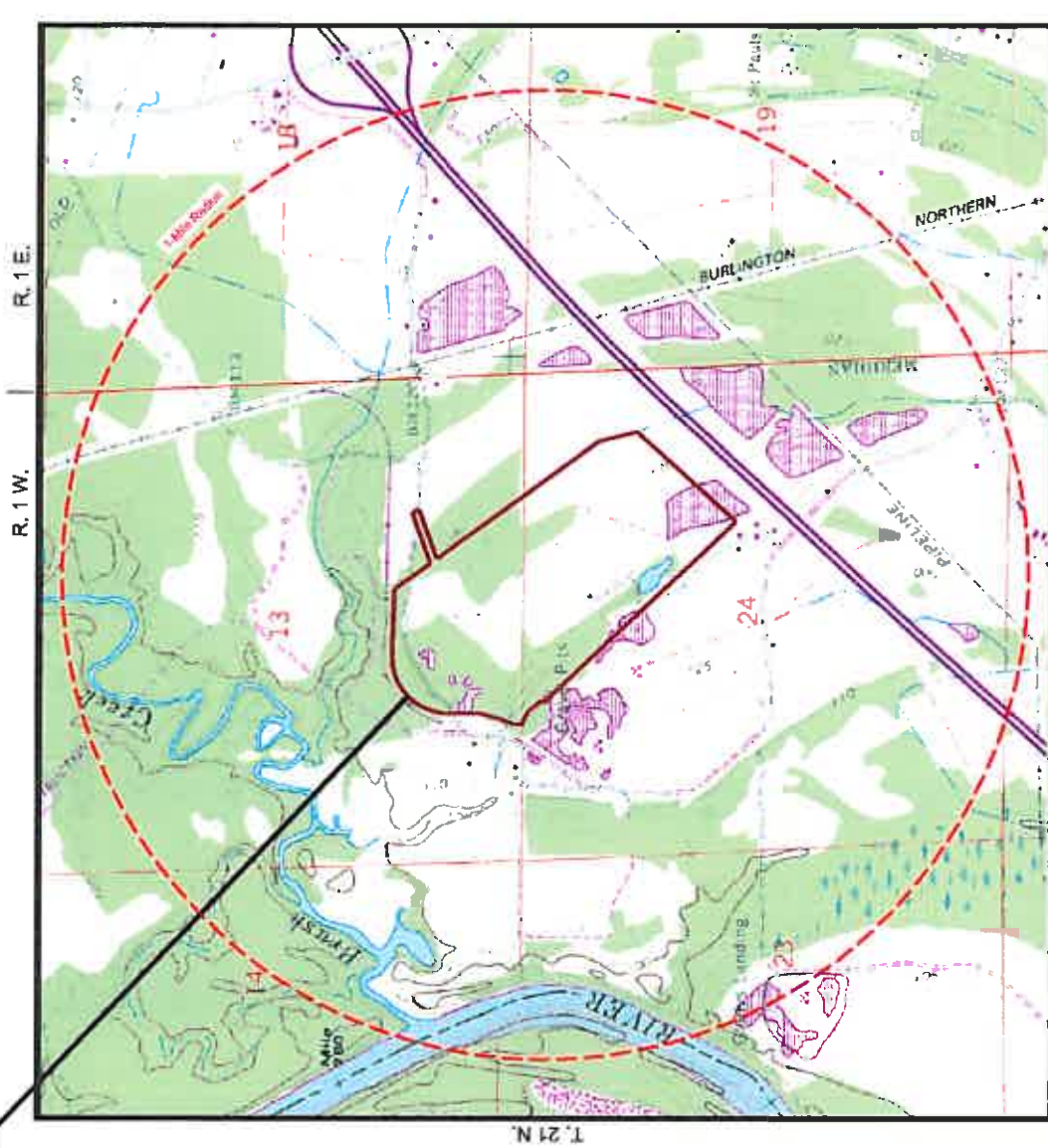
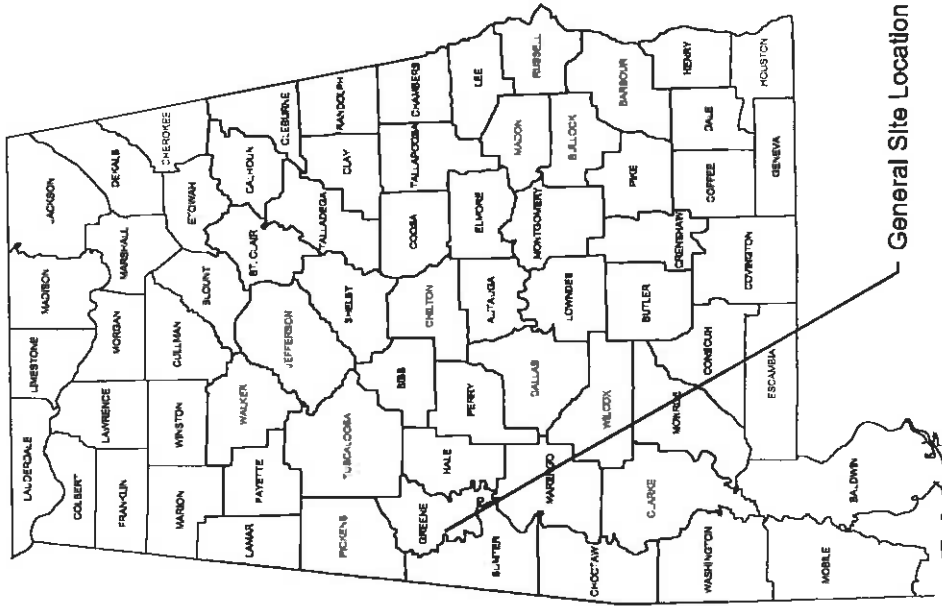
The cellulosic ethanol facility would include the following components:

1. Gasification. A non-food cellulosic feedstock is decomposed to produce synthesis gas (“syngas”) made up of Carbon Monoxide (CO), Hydrogen (H<sub>2</sub>) and CO<sub>2</sub>.
2. Syngas Fermentation. Coskata’s proprietary microorganisms convert the syngas into cellulosic ethanol in our bioreactor system. The ethanol specific yield will be the highest in the industry, making the cellulosic biofuel directly competitive with gasoline.
3. Separation. Ethanol is separated from water via commercially available distillation and molecular sieve technology.
4. Loading areas, Chip Drying facilities, maintenance buildings, storage areas, and associated infrastructure.

The City of Eutaw will provide the facility with an adequate water supply and sanitary sewer capacities. An NPDES permit issued by Alabama Department of Environmental Management (ADEM) will be required for discharge of treated process water and collected stormwater to surface waters. Air Quality and Solid Waste Permits will also be obtained from ADEM. A U.S. Army Corps of Engineers (USACE) Permit will be obtained for proposed impact to onsite wetlands. The project will also be reviewed for any potential impact to other biological, historic, farmland, or floodplain resources.



Approximate Site Boundary



Source: USGS Bollgees, Ala. 7.5 Minute Quadrangle Map, 1970 (Photorevised 1987)



3318 Greenboro Avenue # T, Leedsdale, Alabama 35401  
205.345.0810 # Fax 205.344.0592

TTL PROJECT NO: 600108007  
PROJECT DATE: March 22, 2010

**Figure 1. Site Location and Topographic Map**

S 1/2, Sec. 13 and N 1/2, Sec. 24, T. 21 N., R. 1 W., of the Bollgees, Ala. 7.5 Minute Quadrangle Map

Proposed Flagship Site

Crossroads of America Industrial Park  
Bollgees, Greene County, Alabama



1" = 2000'  
(Approximate)



United States Department of Agriculture  
Rural Development

July 27, 2010

U.S. Fish and Wildlife Service  
Daphne ES Field Office  
1208-B Main Street  
Daphne, Alabama 36526

Attention: Mr. Bill Pearson, Field Supervisor

Re: Coskata Cellulosic Ethanol Facility, Greene County, Alabama  
Threatened Inflated Heelsplitter mussel (*Potamilus inflatus*)  
“may affect/not likely to affect” Letter of Concurrence Request

Dear Mr. Pearson,

The U.S. Department of Agriculture Rural Development (USDA-RD) requests a letter of concurrence from the USFWS with respect to our determination of **“may affect/not likely to affect”** for the Threatened Inflated Heelsplitter mussel (*Potamilus inflatus*) for the Coskata Cellulosic Ethanol Facility proposed in Greene County, Alabama. This request is made under the requirements of Section 7 of the Endangered Species Act.

**Project Description**

The project proposes to construct and operate a Cellulosic Ethanol Facility to produce approximately 55 million gallons per year of ethanol from woody biomass, in Boligee, Alabama. The facility proposes to construct the facility on approximately 150 acres of land located within the Crossroads of America Industrial Port and Park. The facility will consist of the following process equipment including materials handling equipment, biomass gasifier, syngas biofermentor, ethanol separation (distillation), and other infrastructure within the 150 acre parcel. In addition, the project proposes to construct a treated process water effluent pipe and diffuser into the adjacent Tombigbee River located approximately 8,700 feet away which will require a NPDES Discharge Permit from Alabama Department of Environmental Management (ADEM) (Figure 1). Based on the NPDES application, approximately 440,000 gpd of treated process water will be discharged into the Tombigbee River from the project site. An NPDES permit was submitted to Alabama Department of Environmental Management (ADEM) in May 2010. Concurrent with the process water NPDES application, the applicant has requested that ADEM (EPA Form 455) provide a model of the mixing zone in the process water discharge area of the Tombigbee River. The model provides necessary data to solicit a Section 10, River Structure Permit from the Army Corps of Engineers (USACE) which is also required for the project.

1400 Independence Ave, S.W. · Washington DC 20250-0700  
Web: <http://www.rurdev.usda.gov>

Committed to the future of rural communities.

“USDA is an equal opportunity provider, employer and lender.”  
To file a complaint of discrimination, write USDA, Director, Office of Civil Rights,  
1400 Independence Avenue, S.W., Washington, DC 20250-9410 or call (800) 795-3272 (Voice) or (202) 720-6382 (TDD).

The 150-acre tract of land was historically in forestry and agriculture, and is believed to have been cleared in the 1980's and has since been used for agriculture and gravel mining. Currently approximately 100 acres are in hay or grain crops. The footprint of the effluent pipe is predominantly agricultural land, and also goes through the fringe of forested areas.

Construction may be scheduled to begin as early as the Spring 2011, with operations commencing as early as Fall 2012.

### **NEPA Process**

USDA-RD is in the process of preparing an Environmental Assessment (EA) on the project which includes an analysis of potential impacts to threatened and endangered species on the site and affected area. Preliminary Public notice of the project was published on July 9, 2010.

### **Survey Results**

A threatened and endangered species survey report was completed on June 16, 2008 on the 150-acre property as well as the surrounding industrial park encompassing a 1-mile radius (Attachment 2). This survey included the area of the proposed effluent discharge pipe footprint. A document review of the federally-listed endangered species for the project area in Greene County Alabama indicated the potential presence of nine species including the Wood Stork (*Mycteria Americana*), Mitchell's satyr butterfly (*Neonympha mitchellii mitchellii*), Orange-nacre mucket mussel (*Lampsilis perovalis*), Alabama moccasinshell mussel (*Me dionidus acutissimus*), Southern clubshell mussel (*Pleurobema decisum*), Ovate clubshell mussel (*Pleurobema perovatum*), Heavy pigtoe mussel (*Pleurobema taitianum*), Inflated heelsplitter mussel (*Potamilus inflatus*), and Stirrup shell mussel (*Quadrula stapes*). Site investigations were performed for observation of favorable habitats of the above species. Stream banks and beds were observed for the indication of the presence of mussels; however, an underwater survey was not conducted for this survey. No suitable habitats were observed within the project boundaries or within a one-mile radius of the project boundaries for the Wood Stork. No suitable habitats were observed for the Mitchell's satyr butterfly. No freshwater mussels (living or relic) were observed within the project boundaries or adjacent to the project boundaries.

An aquatic survey report was completed in June 2010 on reaches of the Tombigbee River and Bush Creek, near River Mile 260 of the Tombigbee, which are the water courses potentially affected by the project including the wastewater discharge pipe and diffuser within the Tombigbee River (Attachment 3). The report concluded the following:

- The stable gravelly portions of the Tombigbee River could potentially provide suitable habitat for the Alabama moccasinshell, Southern clubshell, Ovate clubshell, Heavy pigtoe and the Stirrup shell mussel; however given the scarcity of common mussel species observed during the survey, inhabitation by these rare species is possible but unlikely in the stable gravelly patches present on site.
- No protected species were observed on the eastern side of Tombigbee River.

- No protected species were observed within the diffuser pipe construction footprint or directly downstream.
- Potentially suitable habitat for the Orangenacre Mucket, Alabama moccasinshell, Southern clubshell and Ovate clubshell is present in the upper reach of Brush Creek; however the entire stream was examined for mussels between area A-8 and area A-11 and only two common species were collected. No observations of protected species were made during the Brush Creek portion of the aquatic survey.
- Inflated Heelsplitters are present in the Tombigbee River directly across from the proposed diffuser location but are likely restricted to the inner bank and possibly other protected submerged slopes in the project vicinity. The aquatic survey concluded that if diffuser discharge is in compliance with the ADEM water quality standards, the consultant did not expect indirect adverse effects to wildlife species including protected species associated with the proposed discharge (Attachments 1 and 3).

USDA- RD is in consultation with ADEM for issuance of the NPDES permit for the proposed project and has recommended that the Inflated Heelsplitters presence as a threatened species be considered as part of the NPDES permit issuance. USDA-RD has requested that the ADEM NPDES permit take into consideration the presence of the Inflated Heelsplitter in the vicinity of the diffuser when determining the regulated concentration of pollutants in the discharge permit. USDA-RD requested that any NPDES permit issued ensure that there would be no indirect adverse affect to these threatened species with respect to permitted concentrations/quantities of pollutants in the discharge. In addition, USDA-RD suggested an evaluation of the Use Designation of "Fish and Wildlife" be reconsidered in the presence of these Threatened Species. Given that ADEM NPDES was notified of this threatened species presence and ADEM issues a discharge permit for the effluent, USDA-RD determines that there would likely be no adverse indirect impact to the Inflated Hellsplitter mussel.

### **Mitigation Measures**

Mitigative measures applicable to the mussel are to follow all ADEM NPDES Permit requirements including discharge monitoring requirements. After startup and operation of the facility, effluent monitoring will include obtaining daily composite samples at the nearest accessible location just prior to the discharge and after final treatment. The composite sample will be obtained by automatic sampling equipment or a minimum of six equal volume grab samples collected over equal time intervals. In addition to the composite samples, the discharge rate will be measured with a continuously recording flow meter and with a continuously recording temperature sensor.

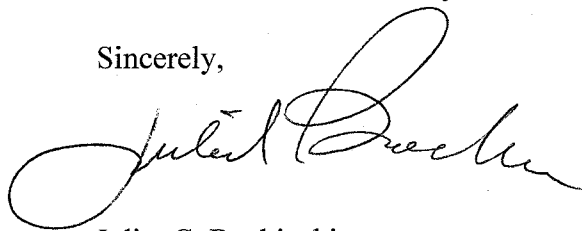
### **USDA-RD Conclusions**

Based on the survey results and proposed NPDES Permit requirements which will be imposed for the project, USDA-RD concludes the project is not likely to affect the Threatened Inflated Heelsplitter mussel (*Potamilus inflatus*). There were no other listed

threatened or endangered species or critical habitat of concern identified in the project area. For these reasons, we request concurrence from USFWS on this determination.

Please feel free to contact me directly if I can provide further information on this request for letter of concurrence at [juliet.bochicchio@wdc.usda.gov](mailto:juliet.bochicchio@wdc.usda.gov) or at (202) 205-8242.

Sincerely,



Juliet C. Bochicchio  
Environmental Protection Specialist

Attachments:

- 1- July 8, 2010 TTL Inc. Summary Letter on Coskata's Biological and Aquatic Surveys.
- 2- June 16, 2008 Letter Report to USFWS from TTL on Coskata's Biological Resources
- 3- June 2010 Coskata Aquatic Survey Report on Tombigbee River (proposed diffuser location) and Brush Creek
- 4- Technical Support for Coskata NPDES Permit Application May 11, 2010





# United States Department of the Interior

FISH AND WILDLIFE SERVICE

1208-B Main Street  
Daphne, Alabama 36526

AUG 25 2010

IN REPLY REFER TO:  
2010-1-0623

Ms. Juliet C. Bochicchio  
USDA Rural Development  
1400 Independence Ave. S.W.  
Washington DC 20250-0700

Dear Ms. Bochicchio:

We are responding to your letter, dated July 27, 2010, requesting concurrence for a determination of "may affect/not likely to adversely affect" the inflated heelsplitter mussel (*Potamilus inflatus*), for the proposed Coskata Cellulose Ethanol Facility in Boligee, Greene County, Alabama. We have reviewed the information and are providing the following comments in accordance with the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. et seq.) and the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

Your letter and survey report describes that the proposed project will construct the facility on approximately 150 acres which will include process equipment and other infrastructure. In addition, the project will construct a treated process water effluent pipe and diffuser into the adjacent Tombigbee River. A field survey report was completed on June 16, 2008, on the 150-acre property as well as the surrounding industrial park encompassing a one mile radius. An aquatic survey report was completed in June 2010 on reaches of the Tombigbee River and Bush Creek which are the areas potentially affected by the project. We understand that you will follow mitigative measures applicable to the mussel outlined in the ADEM NPDES Permit requirement, including discharge monitoring requirements.

Based on the information in your reports and provided the mitigative measures stated in the report are used, we concur with your determination that the proposal may effect, but is not likely to adversely affect the inflated heelsplitter mussel (*Potamilus inflatus*), and will have no effect on other federally listed species or critical habitat.

If you have any questions or need additional information, please contact Ms. Shannon Holbrook at (251) 441-5871.

Sincerely,

William J. Pearson  
Field Supervisor  
Alabama Ecological Service Field Office

[www.fws.gov](http://www.fws.gov)



PHONE: 251-441-5181

FAX: 251-441-6222

DEPARTMENT OF HOMELAND SECURITY  
 FEDERAL EMERGENCY MANAGEMENT AGENCY  
 STANDARD FLOOD HAZARD DETERMINATION

See The Attached  
 Instructions

O.M.B. No. 1660-0040  
 Expires December 31, 2011

SECTION I - LOAN INFORMATION

<b>1. LENDER NAME AND ADDRESS</b> SILICON VALLEY BANK 3003 TASMAN DR. SANTA CLARA , CA 95054 Requestor: YLLARI LEVANO Fax # 4086546313 Phone # 4086547400		<b>2. COLLATERAL (Building/Mobile Home/Personal Property) PROPERTY ADDRESS</b> Flagship Ethanol LLC 2059 County Road 89 Boligee, AL 35443 LOT: BLOCK: SUBDIVISION: TAX#: SECTION: TWP: RANGE: DESCRIPTION: Parcel #23-06-13-0-000-001 002 and 23-06-24-0-000-001 001	
<b>3. LENDER ID. NO.</b>	<b>4. LOAN IDENTIFIER</b> Flagship Ethanol/50A	<b>5. AMOUNT OF FLOOD INSURANCE REQUIRED</b>	

SECTION II

**A. NATIONAL FLOOD INSURANCE PROGRAM (NFIP) COMMUNITY JURISDICTION**

<b>1. NFIP Community Name</b> GREENE CO *	<b>2. County (ies)</b> Green	<b>3. State</b> AL	<b>4. NFIP Community Number</b> 010091
--	---------------------------------	-----------------------	---

**B. NATIONAL FLOOD INSURANCE PROGRAM (NFIP) DATA AFFECTING BUILDING/MOBILE HOME**

<b>1. NFIP Map Number or Community Panel Number (Community name, if not the same as "A")</b> 010091 0341 C	<b>2. NFIP Map Panel Effective/Revised Date</b> 08/05/2010	<b>3. LOMA/LOMR</b> <input type="checkbox"/> Yes Date _____	<b>4. Flood Zone</b> X (Shaded) Elev.	<b>5. No NFIP Map</b>
---	---	---	---	-----------------------

**C. FEDERAL FLOOD INSURANCE AVAILABILITY** (Check all that apply)

1.  Federal Flood insurance is available (community participates in nfip).  Regular Program  Emergency Program of NFIP

2.  Federal Flood insurance is NOT available because community is not participating in the NFIP.

3.  Building/Mobile Home is in a Coastal Barrier Resource Area (CBRA) or Otherwise Protected Area (OPA), Federal Flood insurance may not be available.  
 CBRA/OPA designated date: \_\_\_\_\_

**D. DETERMINATION**

**IS BUILDING/MOBILE HOME IN SPECIAL FLOOD HAZARD AREA (ZONES CONTAINING THE LETTERS "A" OR "V")?**  Yes  No

If yes, flood insurance is required by the Flood Disaster Protection Act of 1973.  
 If no, flood insurance is not required by the Flood Disaster Protection Act of 1973.

**E. COMMENTS (Optional)**

Last Revision: 08/10/2010  
 Reference#: B0506FL00009937

**E1a. SUBMITTED ADDRESS FOR CERTIFICATION**  
 2059 County Road 89  
 Boligee, AL 35443

<b>CERTIFY TO:</b>	<b>TYPE OF COVERAGE:</b> Life of Loan	<b>RUSH:</b>
HMDA INFO: ST: 01 CO: 063	SMSA: 46220	CT: 0602.00

This determination is based on examining the NFIP map, any Federal Emergency Management Agency revisions to it, and any other information needed to locate the building/mobile home on the NFIP map. This flood determination is only for determining the flood status of the listed property. It is not to be used to decide whether to purchase a property or determining the value of a property. Use of determination deems acceptance of conditions.

**F. PREPARER'S INFORMATION**

NAME, ADDRESS TELEPHONE NUMBER (if other than Lender) Factual Data Flood 5200 Hahns Peak Drive Loveland, CO 80538 1-800-730-6374 FAX 1-800-216-5663 www.krollfactualdata.com	DATE OF DETERMINATION: 08/10/2010 CERTIFIED BY: 3551 NFR#: 3138931-10492706
--	---



July 16, 2010

Department of the Army  
Mobile District Corps of Engineers (USACE)  
109 Saint Joseph St  
Mobile, AL 36602

RE: Proposed Coskata Inc. Cellulosic Ethanol Facility, Greene County, Alabama

Dear Sir or Madam:

Coskata Inc. is in the process of making a request for financial assistance to USDA-Rural Development. It is necessary that Rural Development determine compliance with the requirements of the environmental assessment process according to their National Environmental Policy Act (NEPA) regulations on any project financed by the agency.

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Thank you for your time.

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Loula Merkel  
Director of Government Affairs

cc: Juliet Bochicchio, USDA Rural Development

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**Coskata, Inc.**  
**Greene County, Alabama**  
**July 2010**

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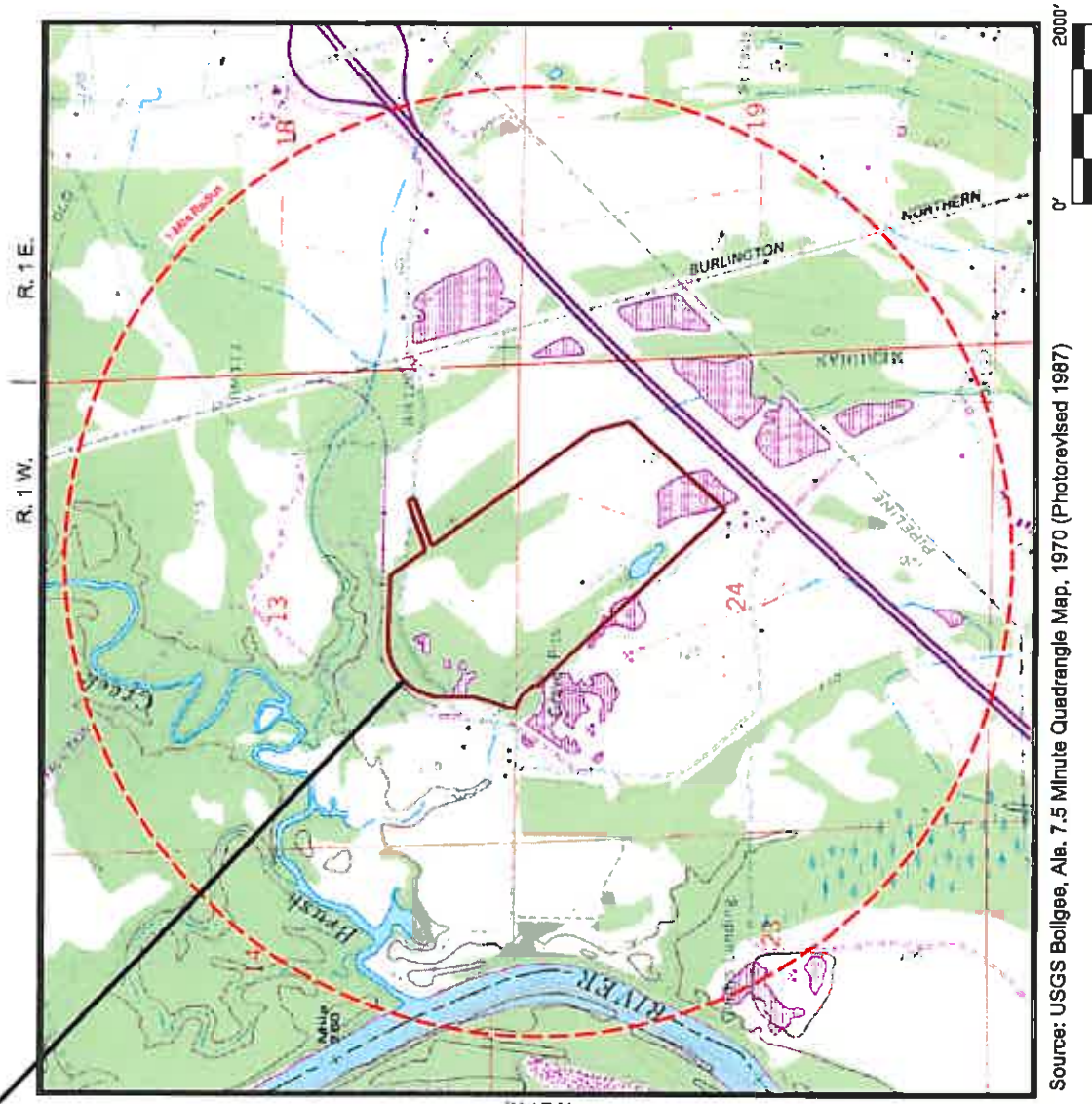
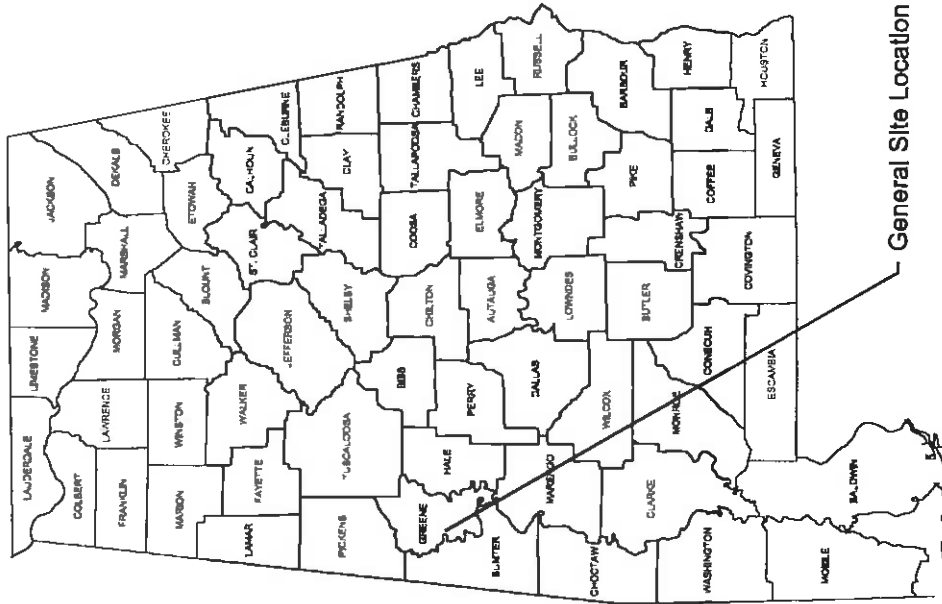
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Approximate Site Boundary



3116 Greystone Avenue  
Tulalaba, Alabama 36411  
205-345-0119 Fax 205-345-0622

TTL PROJECT NO: 800T09007  
PROJECT DATE: March 23, 2010

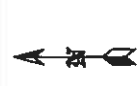
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S 1/2, Sec. 13 and N 1/2, Sec. 24, T. 21 N., R. 1 W., of the Bolgee, Ala. 7.5 Minute Quadrangle Map

Proposed Flagship Site

Crossroads of America Industrial Park

Bolgee, Greene County, Alabama



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(Approximate)