

Appendix K – Tribal Letters



Katheryn Ferrall-Graff
Georgia Transmission Corporation
2100 East Exchange Place
Tucker, GA 30084-5336

6/23/2023

Molly Moore
Tribal Administrator
Alabama – Quassarte Tribal Town
TA@alabama-quassarte.com

Subject: United States Department of Agriculture (USDA) – Rural Development (RD) RUS
Applicant THPO Section 106 Initiation
Georgia Transmission Corporation's Proposed East Central Georgia Reliability Projects
Putnam, Morgan, Walton, and Oconee Counties, Georgia

Dear Ms. Moore:

Georgia Transmission Corporation (Georgia Transmission) may seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) Electric Infrastructure Loan and Loan Guarantee Program for proposed East Central Georgia Reliability Projects (Project). This Project may use the nationwide programmatic agreement (NPA) to obligate funds before completing Section 106.¹

Georgia Transmission, along with other members of Georgia's Integrated Transmission System (ITS), continuously monitors and assesses the performance and capability of Georgia's electric system and makes system upgrades when it is determined there is insufficient capacity to meet electric demand.

In 2007, Georgia Transmission announced several projects to include new substations and transmission lines that were needed to ensure continued electric reliability in this region. Locations for the substations and routes for the new transmission lines were selected, public information meetings were held, and most of the property and easements needed were purchased. As the economy slowed and power generation patterns shifted, it was determined the proposed projects should be postponed and activity was paused in 2013.

With changes in power generation, including the addition of new solar facilities and the retirement of coal facilities, and increased demand from residents and businesses, these projects

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are being reactivated to maintain safe, reliable, and cost-effective power while avoiding the risk for potential wide-area blackouts.

The proposed East Central Georgia Reliability Projects consist of the following components (see attached graphic):

- **CONSTRUCTION OF FIVE (5) NEW/GREENFIELD PROJECTS:**

- **New Substations**

- **East Walton 500/230 kV Substation** – located in Walton County near the City of Good Hope. A portion of an approximately 62-acre tract will be developed for the construction of a new substation. This tract was purchased as an Advance Land Purchase project in 2009. Georgia Transmission will construct and own this facility.
- **Bostwick 230 kV Switching Station** – located in Morgan County near the city of Bostwick. A portion of an approximately 39.25-acre tract will be developed for the construction of a new substation and modifications to the existing East Social Circle – East Watkinsville 230 kV Transmission Line. The tract was purchased as an Advance Land Purchase project in 2009, while the easement for the transmission line modification was purchased in 2010. Georgia Transmission will construct and own this facility.
- **Rockville 500 kV Switching Station** – located in Putnam County. This new substation will be constructed on land owned by Georgia Power Company. Georgia Power will construct and own the facility.
- **Jacks Creek 230 kV Switching Station** – located in Walton County and within the city of Monroe. This new switching station will be constructed and owned by the Municipal Electric Authority of Georgia.

- **New Transmission Lines**

- **East Walton – Rockville 500 kV Transmission Line** – project is approximately 46.5-miles long and located in Walton, Morgan, and Putnam Counties. Approximately 15 miles of the transmission line route in Putnam County is located in a vacant but maintained 150-foot right-of-way purchased from Georgia Power Company. All easements were purchased as an Advance Land Purchase project in 2011 with a 150-foot-wide easement. Georgia Transmission will construct and own this facility.
- **Bostwick – East Walton 230 kV Transmission Line** – project is approximately 5.2-miles long and located in Walton and Morgan Counties. All easements were purchased as an Advance Land Purchase project in 2011. Project will be constructed adjacent to a portion of the proposed East Walton – Rockville Transmission Line corridor; the combined corridor for this segment will be 225-feet wide. Georgia Transmission will construct and own this facility.

- **East Walton – Jack’s Creek 230 kV Transmission Line** – project is approximately 9.0-miles long and located in Walton County. All easements were purchased as an Advance Land Purchase project in 2010. This project is mostly located adjacent to existing roadsides with a variable easement of approximately 30-feet; cross-country easements are 100-feet wide. Georgia Transmission will construct and own this facility.
- **Bethabara – East Walton 230 kV Transmission Line** – project is approximately 10.2-miles long and located in Oconee and Walton Counties. The majority of the easements were purchased as an Advance Land Purchase project in 2013; however, some easements still need to be acquired. Georgia Transmission will construct and own this facility.
- **PROPOSED MODIFICATIONS TO EXISTING GEORGIA TRANSMISSION FACILITIES**
 - **Bethabara 230/115 kV Substation** – Terminate new Bethabara – East Walton 230 kV Transmission Line into existing substation. Georgia Transmission will construct these modifications.
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- **PROPOSED MODIFICATIONS TO NON-GEORGIA TRANSMISSION FACILITIES**
 - **Doyle – Monroe 230 kV Transmission Line** – The existing Georgia Power Company transmission line will be modified to terminate into the proposed Jacks Creek 230 kV Substation. Modifications will be made by Municipal Electric Authority of Georgia
 - **Scherer – Warthen 500 kV Transmission Line** – The existing Georgia Power Company transmission line will be modified to terminate into the proposed Rockville 500 kV substation. Modifications will be made by Georgia Power Company.

Additional information on these projects can be found at: <https://www.gatransmission.com/ecrp/>

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction

staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Georgia Transmission proposes that the APE for the referenced project consists of all areas of proposed easement, within which construction and ground disturbing activities would occur, and properties within the viewshed of the proposed project. The APE does or does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The proposed project will be surveyed for cultural resources and the Criteria of Eligibility will be applied to any identified properties to determine if any of those properties are eligible for inclusion in the NRHP. All work will be done in compliance with the “Programmatic Agreement Among the Rural Utilities Service, the Georgia State Historic Preservation Officer [SHPO], and the Advisory Council on Historic Preservation [ACHP] Concerning the Construction and Modification of Transmission Facilities by Georgia Transmission Corporation.”

The proposed project also was previously surveyed for archaeological resources between 2007 and 2010, and a series of reports were prepared at that time. Copies of these reports can be downloaded at the following link:

https://gafoc365-my.sharepoint.com/:f:/g/personal/graff_gafoc_com/Erjte1ufqvVAn2pBBYxEKbEB2DS2ztBy05A4rtu8ex-c3Q?e=Rw1LM9

Because of the age of these reports, changing survey methodologies, and modifications to the project footprint, Georgia Transmission contracted with the original project archaeologist to conduct a thorough review and analysis to assess the overall status of the project’s regulatory compliance regarding the previous archaeological work performed as well as provide recommendations for additional survey or resurvey efforts. The analysis, findings, and recommendations are summarized in a memo dated June 6, 2023. Georgia Transmission proposes to follow these recommendations to supplement the previous archaeology survey efforts. A copy of this memo can be downloaded at the following link:

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Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its Electric Infrastructure Loan & Loan Guarantee Program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Georgia Transmission is notifying you about the referenced project because of the possible interest of the Alabama – Quassarte Tribal Town in Putnam, Morgan, Walton, and Oconee Counties, Georgia. Should the Alabama – Quassarte Tribal Town elect to participate in Section 106 review of the referenced project, please respond in writing via letter or email as soon as possible to Katheryn Ferrall-Graff, Georgia Transmission Environmental and Regulatory Coordinator at **Katheryn.Graff@gatransmission.com** or physical address: Georgia Transmission Corporation, 2100 East Exchange Place, Tucker, Georgia 30084.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Georgia Transmission will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations, and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to: Gregory Korosec, PhD, RPA/RUS Archaeologist, via email at **Gregory.Korosec@usda.gov**, or physical address: Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development, United States Department of Agriculture, 1400 Independence Avenue, SW, Mail Stop 1570, Washington, DC 20250.

Please submit your response **electronically** by 7/24/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Katheryn Ferrall-Graff
SOI Qualified Architectural Historian
Environmental & Regulatory Coordinator
Georgia Transmission Corporation

Enclosure: Project Location Map

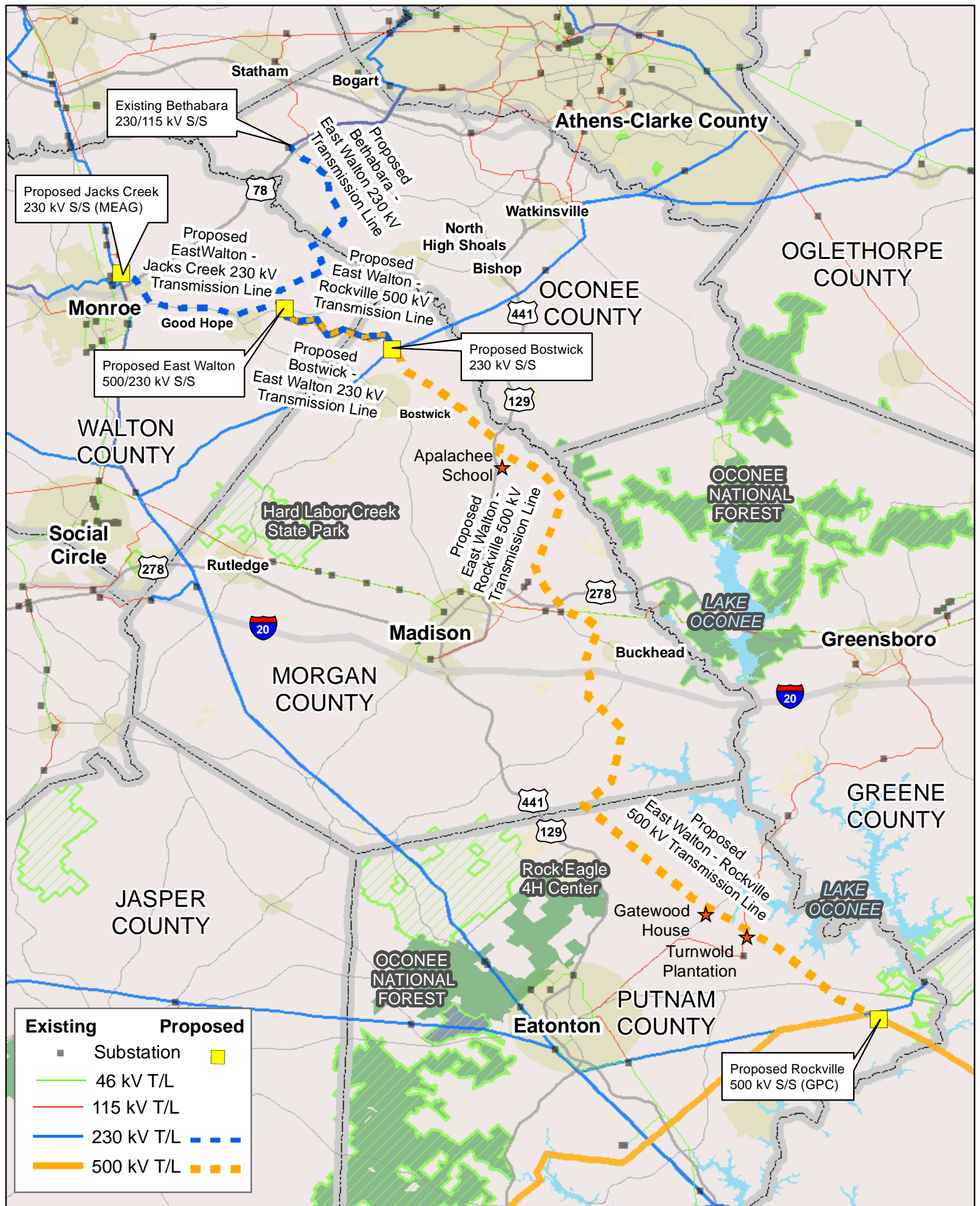
Documents attached via Microsoft OneDrive link:

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CC: Gregory Korosec, PhD, RPA, Cultural Resource Specialist, USDA, Rural Development, Rural Utilities Service Environmental and Historic Preservation

Stacy Rieke, Environmental Review and Preservation Planning Program Manager, Georgia SHPO/Georgia Department of Community Affairs





United States Department of Agriculture

6/23/2023

Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 2230
Stop 1570,
Washington, DC,
20250
Voice 202.720.9540

Elizabeth Toombs
Tribal Historic Preservation Officer
Cherokee Nation
elizabeth-toombs@cherokee.org

Subject: United States Department of Agriculture (USDA) – Rural Development (RD)
RUS THPO Section 106 Initiation
Georgia Transmission Corporation's Proposed East Central Georgia Reliability Projects
Putnam, Morgan, Walton, and Oconee Counties, Georgia

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USDA is an equal opportunity provider and employer.

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

these projects are being reactivated to maintain safe, reliable, and cost-effective power while avoiding the risk for potential wide-area blackouts.

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RUS is notifying you about the referenced project because of the possible interest of the Cherokee Nation in Putnam, Morgan, Walton, and Oconee Counties, Georgia. Should the Cherokee Nation elect to participate in Section 106 review of the referenced project, please respond in writing via letter or email as soon as possible to Gregory Korosec, PhD, RPA/RUS Archaeologist, via email at **Gregory.Korosec@usda.gov**, or physical address: Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development, United States Department of Agriculture, 1400 Independence Avenue, SW, Mail Stop 1570, Washington, DC 20250. You may also contact: Katheryn Ferrall-Graff, Georgia Transmission Environmental and Regulatory Coordinator at **Katheryn.Graff@gatransmission.com** or physical address: Georgia Transmission Corporation, 2100 East Exchange Place, Tucker, Georgia 30084.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Georgia Transmission will respect the confidentiality of the information which you provide to the fullest extent possible.

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Environmental and Historic Preservation Division, Rural Utilities Service,
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CC: Kathryn Ferrall-Graff, Environmental and Regulatory Coordinator/SOI Qualified Professional, Georgia Transmission Corporation

Stacy Rieke, Environmental Review and Preservation Planning Program Manager, Georgia SHPO/Georgia Department of Community Affairs



Katheryn Ferrall-Graff
Georgia Transmission Corporation
2100 East Exchange Place
Tucker, GA 30084-5336

6/23/2023

Kristian Poncho
Tribal Historic Preservation Officer
Coushatta Tribe of Louisiana
kponcho@coushatta.org

Subject: United States Department of Agriculture (USDA) – Rural Development (RD) RUS
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staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Georgia Transmission proposes that the APE for the referenced project consists of all areas of proposed easement, within which construction and ground disturbing activities would occur, and properties within the viewshed of the proposed project. The APE does or does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The proposed project will be surveyed for cultural resources and the Criteria of Eligibility will be applied to any identified properties to determine if any of those properties are eligible for inclusion in the NRHP. All work will be done in compliance with the “Programmatic Agreement Among the Rural Utilities Service, the Georgia State Historic Preservation Officer [SHPO], and the Advisory Council on Historic Preservation [ACHP] Concerning the Construction and Modification of Transmission Facilities by Georgia Transmission Corporation.”

The proposed project also was previously surveyed for archaeological resources between 2007 and 2010, and a series of reports were prepared at that time. Copies of these reports can be downloaded at the following link:

https://gafoc365-my.sharepoint.com/:f:/g/personal/graff_gafoc_com/Erjte1ufqvVAn2pBBYxEKbEB2DS2ztBy05A4rtu8ex-c3Q?e=Rw1LM9

Because of the age of these reports, changing survey methodologies, and modifications to the project footprint, Georgia Transmission contracted with the original project archaeologist to conduct a thorough review and analysis to assess the overall status of the project’s regulatory compliance regarding the previous archaeological work performed as well as provide recommendations for additional survey or resurvey efforts. The analysis, findings, and recommendations are summarized in a memo dated June 6, 2023. Georgia Transmission proposes to follow these recommendations to supplement the previous archaeology survey efforts. A copy of this memo can be downloaded at the following link:

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Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its Electric Infrastructure Loan & Loan Guarantee Program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Georgia Transmission is notifying you about the referenced project because of the possible interest of the Coushatta Tribe of Louisiana in Putnam, Morgan, Walton, and Oconee Counties, Georgia. Should the Coushatta Tribe of Louisiana elect to participate in Section 106 review of the referenced project, please respond in writing via letter or email as soon as possible to Katheryn Ferrall-Graff, Georgia Transmission Environmental and Regulatory Coordinator at **Katheryn.Graff@gatransmission.com** or physical address: Georgia Transmission Corporation, 2100 East Exchange Place, Tucker, Georgia 30084.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Georgia Transmission will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations, and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to: Gregory Korosec, PhD, RPA/RUS Archaeologist, via email at **Gregory.Korosec@usda.gov**, or physical address: Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development, United States Department of Agriculture, 1400 Independence Avenue, SW, Mail Stop 1570, Washington, DC 20250.

Please submit your response **electronically** by 7/24/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Katheryn Ferrall-Graff
SOI Qualified Architectural Historian
Environmental & Regulatory Coordinator
Georgia Transmission Corporation

Enclosure: Project Location Map

Documents attached via Microsoft OneDrive link:

Franz, David M.

- 2008a *Intensive Archaeological Resources Survey for the Proposed East Walton Electric Transmission Line, Putnam, Morgan, Oconee, and Walton Counties, Georgia*. Prepared by Brockington and Associates, Inc., Norcross, Georgia for Georgia Transmission Corporation, Tucker.
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- 2023 *East Central Georgia Reliability Project, Morgan, Oconee, Putnam, and Walton Counties, Georgia*. Prepared by NV5, Alpharetta, Georgia for Georgia Transmission Corporation, Tucker.

CC: Gregory Korosec, PhD, RPA, Cultural Resource Specialist, USDA, Rural Development, Rural Utilities Service Environmental and Historic Preservation

Stacy Rieke, Environmental Review and Preservation Planning Program Manager, Georgia SHPO/Georgia Department of Community Affairs



Katheryn Ferrall-Graff
Georgia Transmission Corporation
2100 East Exchange Place
Tucker, GA 30084-5336

6/23/2023

Russell Townsend
Tribal Historic Preservation Officer
Eastern Band of Cherokee Indians
syerka@nc-chokeee.com

Subject: United States Department of Agriculture (USDA) – Rural Development (RD) RUS
Applicant THPO Section 106 Initiation
Georgia Transmission Corporation's Proposed East Central Georgia Reliability Projects
Putnam, Morgan, Walton, and Oconee Counties, Georgia

Dear Mr. Townsend:

Georgia Transmission Corporation (Georgia Transmission) may seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) Electric Infrastructure Loan and Loan Guarantee Program for proposed East Central Georgia Reliability Projects (Project). This Project may use the nationwide programmatic agreement (NPA) to obligate funds before completing Section 106.¹

Georgia Transmission, along with other members of Georgia's Integrated Transmission System (ITS), continuously monitors and assesses the performance and capability of Georgia's electric system and makes system upgrades when it is determined there is insufficient capacity to meet electric demand.

In 2007, Georgia Transmission announced several projects to include new substations and transmission lines that were needed to ensure continued electric reliability in this region. Locations for the substations and routes for the new transmission lines were selected, public information meetings were held, and most of the property and easements needed were purchased. As the economy slowed and power generation patterns shifted, it was determined the proposed projects should be postponed and activity was paused in 2013.

With changes in power generation, including the addition of new solar facilities and the retirement of coal facilities, and increased demand from residents and businesses, these projects

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

are being reactivated to maintain safe, reliable, and cost-effective power while avoiding the risk for potential wide-area blackouts.

The proposed East Central Georgia Reliability Projects consist of the following components (see attached graphic):

- **CONSTRUCTION OF FIVE (5) NEW/GREENFIELD PROJECTS:**

- **New Substations**

- **East Walton 500/230 kV Substation** – located in Walton County near the City of Good Hope. A portion of an approximately 62-acre tract will be developed for the construction of a new substation. This tract was purchased as an Advance Land Purchase project in 2009. Georgia Transmission will construct and own this facility.
- **Bostwick 230 kV Switching Station** – located in Morgan County near the city of Bostwick. A portion of an approximately 39.25-acre tract will be developed for the construction of a new substation and modifications to the existing East Social Circle – East Watkinsville 230 kV Transmission Line. The tract was purchased as an Advance Land Purchase project in 2009, while the easement for the transmission line modification was purchased in 2010. Georgia Transmission will construct and own this facility.
- **Rockville 500 kV Switching Station** – located in Putnam County. This new substation will be constructed on land owned by Georgia Power Company. Georgia Power will construct and own the facility.
- **Jacks Creek 230 kV Switching Station** – located in Walton County and within the city of Monroe. This new switching station will be constructed and owned by the Municipal Electric Authority of Georgia.

- **New Transmission Lines**

- **East Walton – Rockville 500 kV Transmission Line** – project is approximately 46.5-miles long and located in Walton, Morgan, and Putnam Counties. Approximately 15 miles of the transmission line route in Putnam County is located in a vacant but maintained 150-foot right-of-way purchased from Georgia Power Company. All easements were purchased as an Advance Land Purchase project in 2011 with a 150-foot-wide easement. Georgia Transmission will construct and own this facility.
- **Bostwick – East Walton 230 kV Transmission Line** – project is approximately 5.2-miles long and located in Walton and Morgan Counties. All easements were purchased as an Advance Land Purchase project in 2011. Project will be constructed adjacent to a portion of the proposed East Walton – Rockville Transmission Line corridor; the combined corridor for this segment will be 225-feet wide. Georgia Transmission will construct and own this facility.

- **East Walton – Jack’s Creek 230 kV Transmission Line** – project is approximately 9.0-miles long and located in Walton County. All easements were purchased as an Advance Land Purchase project in 2010. This project is mostly located adjacent to existing roadsides with a variable easement of approximately 30-feet; cross-country easements are 100-feet wide. Georgia Transmission will construct and own this facility.
 - **Bethabara – East Walton 230 kV Transmission Line** – project is approximately 10.2-miles long and located in Oconee and Walton Counties. The majority of the easements were purchased as an Advance Land Purchase project in 2013; however, some easements still need to be acquired. Georgia Transmission will construct and own this facility.
- **PROPOSED MODIFICATIONS TO EXISTING GEORGIA TRANSMISSION FACILITIES**
 - **Bethabara 230/115 kV Substation** – Terminate new Bethabara – East Walton 230 kV Transmission Line into existing substation. Georgia Transmission will construct these modifications.
 - **East Social Circle – East Watkinsville 230 kV Transmission** – Loop-existing transmission line into the proposed Bostwick 230 kV Switching Station. Georgia Transmission will construct these modifications.
 - **East Social Circle 230 kV and East Watkinsville 230 kV Substations** – Modify Relaying. Georgia Transmission will construct these modifications.
 - **PROPOSED MODIFICATIONS TO NON-GEORGIA TRANSMISSION FACILITIES**
 - **Doyle – Monroe 230 kV Transmission Line** – The existing Georgia Power Company transmission line will be modified to terminate into the proposed Jacks Creek 230 kV Substation. Modifications will be made by Municipal Electric Authority of Georgia
 - **Scherer – Warthen 500 kV Transmission Line** – The existing Georgia Power Company transmission line will be modified to terminate into the proposed Rockville 500 kV substation. Modifications will be made by Georgia Power Company.

Additional information on these projects can be found at: <https://www.gatransmission.com/ecrp/>

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

RUS defines the area of potential effect (APE), as an area that includes all Project construction and excavation activity required to construct, modify, improve, or maintain any facilities; any right-of-way or easement areas necessary for the construction, operation, and maintenance of the Project; all areas used for excavation of borrow material and habitat creation; all construction

staging areas, access routes, utilities, spoil areas, and stockpiling areas. Impacts that come from the undertaking at the same time and place with no intervening causes, are considered “direct” regardless of its specific type (e.g., whether it is visual, physical, auditory, etc.). “Indirect” effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable.

Based on this definition, Georgia Transmission proposes that the APE for the referenced project consists of all areas of proposed easement, within which construction and ground disturbing activities would occur, and properties within the viewshed of the proposed project. The APE does or does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The proposed project will be surveyed for cultural resources and the Criteria of Eligibility will be applied to any identified properties to determine if any of those properties are eligible for inclusion in the NRHP. All work will be done in compliance with the “Programmatic Agreement Among the Rural Utilities Service, the Georgia State Historic Preservation Officer [SHPO], and the Advisory Council on Historic Preservation [ACHP] Concerning the Construction and Modification of Transmission Facilities by Georgia Transmission Corporation.”

The proposed project also was previously surveyed for archaeological resources between 2007 and 2010, and a series of reports were prepared at that time. Copies of these reports can be downloaded at the following link:

https://gafoc365-my.sharepoint.com/:f:/g/personal/graff_gafoc_com/Erjte1ufqvVAn2pBBYxEKbEB2DS2ztBy05A4rtu8ex-c3Q?e=Rw1LM9

Because of the age of these reports, changing survey methodologies, and modifications to the project footprint, Georgia Transmission contracted with the original project archaeologist to conduct a thorough review and analysis to assess the overall status of the project’s regulatory compliance regarding the previous archaeological work performed as well as provide recommendations for additional survey or resurvey efforts. The analysis, findings, and recommendations are summarized in a memo dated June 6, 2023. Georgia Transmission proposes to follow these recommendations to supplement the previous archaeology survey efforts. A copy of this memo can be downloaded at the following link:

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Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its Electric Infrastructure Loan & Loan Guarantee Program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Georgia Transmission is notifying you about the referenced project because of the possible interest of the Eastern Band of Cherokee Indians in Putnam, Morgan, Walton, and Oconee Counties, Georgia. Should the Eastern Band of Cherokee Indians elect to participate in Section 106 review of the referenced project, please respond in writing via letter or email as soon as possible to Katheryn Ferrall-Graff, Georgia Transmission Environmental and Regulatory Coordinator at **Katheryn.Graff@gatransmission.com** or physical address: Georgia Transmission Corporation, 2100 East Exchange Place, Tucker, Georgia 30084.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Georgia Transmission will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations, and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to: Gregory Korosec, PhD, RPA/RUS Archaeologist, via email at **Gregory.Korosec@usda.gov**, or physical address: Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development, United States Department of Agriculture, 1400 Independence Avenue, SW, Mail Stop 1570, Washington, DC 20250.

Please submit your response **electronically** by 7/24/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Katheryn Ferrall-Graff
SOI Qualified Architectural Historian
Environmental & Regulatory Coordinator
Georgia Transmission Corporation

Enclosure: Project Location Map

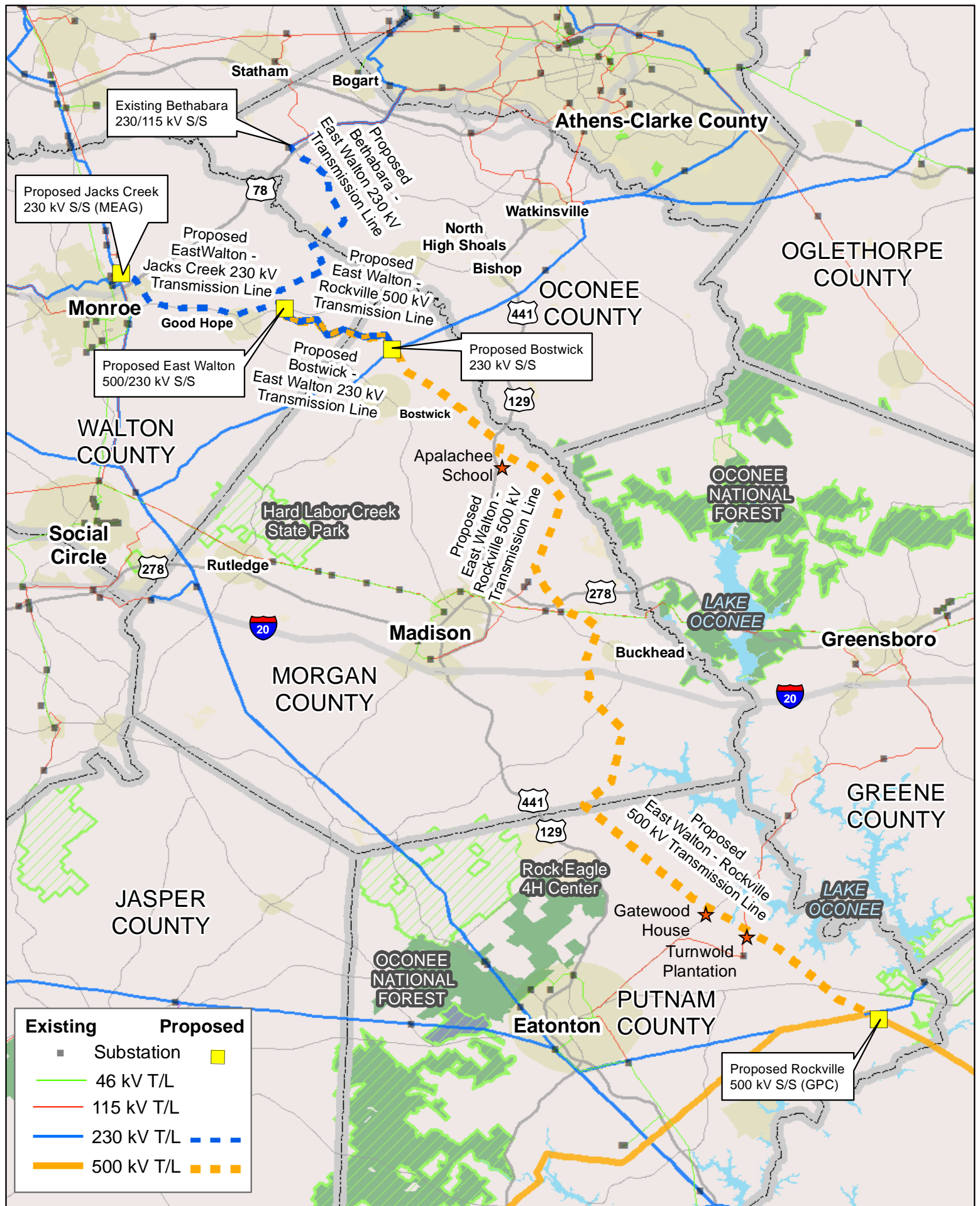
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- 2023 *East Central Georgia Reliability Project, Morgan, Oconee, Putnam, and Walton Counties, Georgia*. Prepared by NV5, Alpharetta, Georgia for Georgia Transmission Corporation, Tucker.

CC: Gregory Korosec, PhD, RPA, Cultural Resource Specialist, USDA, Rural Development, Rural Utilities Service Environmental and Historic Preservation

Stacy Rieke, Environmental Review and Preservation Planning Program Manager, Georgia SHPO/Georgia Department of Community Affairs





Katheryn Ferrall-Graff
Georgia Transmission Corporation
2100 East Exchange Place
Tucker, GA 30084-5336

6/23/2023

Turner Hunt
Tribal Historic Preservation Officer
Muscogee (Creek) Nation
Section106@MuscogeeNation.com

Subject: United States Department of Agriculture (USDA) – Rural Development (RD) RUS
Applicant THPO Section 106 Initiation
Georgia Transmission Corporation's Proposed East Central Georgia Reliability Projects
Putnam, Morgan, Walton, and Oconee Counties, Georgia

Dear Mr. Turner Hunt:

Georgia Transmission Corporation (Georgia Transmission) may seek financial assistance from the USDA Rural Development (RD), Rural Utilities Service (RUS) Electric Infrastructure Loan and Loan Guarantee Program for proposed East Central Georgia Reliability Projects (Project). This Project may use the nationwide programmatic agreement (NPA) to obligate funds before completing Section 106.¹

Georgia Transmission, along with other members of Georgia's Integrated Transmission System (ITS), continuously monitors and assesses the performance and capability of Georgia's electric system and makes system upgrades when it is determined there is insufficient capacity to meet electric demand.

In 2007, Georgia Transmission announced several projects to include new substations and transmission lines that were needed to ensure continued electric reliability in this region. Locations for the substations and routes for the new transmission lines were selected, public information meetings were held, and most of the property and easements needed were purchased. As the economy slowed and power generation patterns shifted, it was determined the proposed projects should be postponed and activity was paused in 2013.

With changes in power generation, including the addition of new solar facilities and the retirement of coal facilities, and increased demand from residents and businesses, these projects

¹ *Nationwide Programmatic Agreement among the U.S. Department of Agriculture Rural Development Programs, National Conference of State Historic Preservation Officers, Tribal Signatories, and The Advisory Council on Historic Preservation for Sequencing Section 106 (NPA).*

are being reactivated to maintain safe, reliable, and cost-effective power while avoiding the risk for potential wide-area blackouts.

The proposed East Central Georgia Reliability Projects consist of the following components (see attached graphic):

- **CONSTRUCTION OF FIVE (5) NEW/GREENFIELD PROJECTS:**

- **New Substations**

- **East Walton 500/230 kV Substation** – located in Walton County near the City of Good Hope. A portion of an approximately 62-acre tract will be developed for the construction of a new substation. This tract was purchased as an Advance Land Purchase project in 2009. Georgia Transmission will construct and own this facility.
- **Bostwick 230 kV Switching Station** – located in Morgan County near the city of Bostwick. A portion of an approximately 39.25-acre tract will be developed for the construction of a new substation and modifications to the existing East Social Circle – East Watkinsville 230 kV Transmission Line. The tract was purchased as an Advance Land Purchase project in 2009, while the easement for the transmission line modification was purchased in 2010. Georgia Transmission will construct and own this facility.
- **Rockville 500 kV Switching Station** – located in Putnam County. This new substation will be constructed on land owned by Georgia Power Company. Georgia Power will construct and own the facility.
- **Jacks Creek 230 kV Switching Station** – located in Walton County and within the city of Monroe. This new switching station will be constructed and owned by the Municipal Electric Authority of Georgia.

- **New Transmission Lines**

- **East Walton – Rockville 500 kV Transmission Line** – project is approximately 46.5-miles long and located in Walton, Morgan, and Putnam Counties. Approximately 15 miles of the transmission line route in Putnam County is located in a vacant but maintained 150-foot right-of-way purchased from Georgia Power Company. All easements were purchased as an Advance Land Purchase project in 2011 with a 150-foot-wide easement. Georgia Transmission will construct and own this facility.
- **Bostwick – East Walton 230 kV Transmission Line** – project is approximately 5.2-miles long and located in Walton and Morgan Counties. All easements were purchased as an Advance Land Purchase project in 2011. Project will be constructed adjacent to a portion of the proposed East Walton – Rockville Transmission Line corridor; the combined corridor for this segment will be 225-feet wide. Georgia Transmission will construct and own this facility.

- **East Walton – Jack’s Creek 230 kV Transmission Line** – project is approximately 9.0-miles long and located in Walton County. All easements were purchased as an Advance Land Purchase project in 2010. This project is mostly located adjacent to existing roadsides with a variable easement of approximately 30-feet; cross-country easements are 100-feet wide. Georgia Transmission will construct and own this facility.
 - **Bethabara – East Walton 230 kV Transmission Line** – project is approximately 10.2-miles long and located in Oconee and Walton Counties. The majority of the easements were purchased as an Advance Land Purchase project in 2013; however, some easements still need to be acquired. Georgia Transmission will construct and own this facility.
- **PROPOSED MODIFICATIONS TO EXISTING GEORGIA TRANSMISSION FACILITIES**
 - **Bethabara 230/115 kV Substation** – Terminate new Bethabara – East Walton 230 kV Transmission Line into existing substation. Georgia Transmission will construct these modifications.
 - **East Social Circle – East Watkinsville 230 kV Transmission** – Loop-existing transmission line into the proposed Bostwick 230 kV Switching Station. Georgia Transmission will construct these modifications.
 - **East Social Circle 230 kV and East Watkinsville 230 kV Substations** – Modify Relaying. Georgia Transmission will construct these modifications.
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Additional information on these projects can be found at: <https://www.gatransmission.com/ecrp/>

If RUS elects to fund the Project, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800.

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Based on this definition, Georgia Transmission proposes that the APE for the referenced project consists of all areas of proposed easement, within which construction and ground disturbing activities would occur, and properties within the viewshed of the proposed project. The APE does or does not include any tribal lands as defined pursuant to 36 CFR § 800.16(x).

The proposed project will be surveyed for cultural resources and the Criteria of Eligibility will be applied to any identified properties to determine if any of those properties are eligible for inclusion in the NRHP. All work will be done in compliance with the “Programmatic Agreement Among the Rural Utilities Service, the Georgia State Historic Preservation Officer [SHPO], and the Advisory Council on Historic Preservation [ACHP] Concerning the Construction and Modification of Transmission Facilities by Georgia Transmission Corporation.”

The proposed project also was previously surveyed for archaeological resources between 2007 and 2010, and a series of reports were prepared at that time. Copies of these reports can be downloaded at the following link:

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Because of the age of these reports, changing survey methodologies, and modifications to the project footprint, Georgia Transmission contracted with the original project archaeologist to conduct a thorough review and analysis to assess the overall status of the project’s regulatory compliance regarding the previous archaeological work performed as well as provide recommendations for additional survey or resurvey efforts. The analysis, findings, and recommendations are summarized in a memo dated June 6, 2023. Georgia Transmission proposes to follow these recommendations to supplement the previous archaeology survey efforts. A copy of this memo can be downloaded at the following link:

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Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, “Environmental Policies and Procedures” (7 CFR Part 1970), RUS has issued a blanket delegation for its applicants to initiate and proceed through Section 106 review if there is agreement.

In delegating this authority, RUS is advocating for the direct interaction between its Electric Infrastructure Loan & Loan Guarantee Program applicants and Indian tribes. RUS believes this interaction, prior to direct agency involvement, will support and encourage the consideration of impacts to historic properties of importance to Indian tribes earlier in project planning.

Georgia Transmission is notifying you about the referenced project because of the possible interest of the Muscogee (Creek) Nation in Putnam, Morgan, Walton, and Oconee Counties, Georgia. Should the Muscogee (Creek) Nation elect to participate in Section 106 review of the referenced project, please respond in writing via letter or email as soon as possible to Katheryn Ferrall-Graff, Georgia Transmission Environmental and Regulatory Coordinator at **Katheryn.Graff@gatransmission.com** or physical address: Georgia Transmission Corporation, 2100 East Exchange Place, Tucker, Georgia 30084.

Please include with your affirmative response, a description of any specific historic properties or important tribal resources in the APE and your recommendations about the level of effort needed to identify additional historic properties which might be affected by the referenced project. Georgia Transmission will respect the confidentiality of the information which you provide to the fullest extent possible.

If at any time you wish to share your interests, recommendations, and concerns directly with RUS, as the agency responsible for conducting Section 106 review, or to request that RUS participate directly in Section 106 review, please notify me at once, preferably via email. However, you may contact RUS directly. If you wish to do so, please submit your request to: Gregory Korosec, PhD, RPA/RUS Archaeologist, via email at **Gregory.Korosec@usda.gov**, or physical address: Environmental and Historic Preservation Division, Rural Utilities Service, Rural Development, United States Department of Agriculture, 1400 Independence Avenue, SW, Mail Stop 1570, Washington, DC 20250.

Please submit your response **electronically** by 7/24/2023. RUS will proceed to the next step in Section 106 review if you fail to provide a timely response. Should you have any questions or require additional information you may contact me at the mailing address and email provided above.

Sincerely,



Katheryn Ferrall-Graff
SOI Qualified Architectural Historian
Environmental & Regulatory Coordinator
Georgia Transmission Corporation

Enclosure: Project Location Map

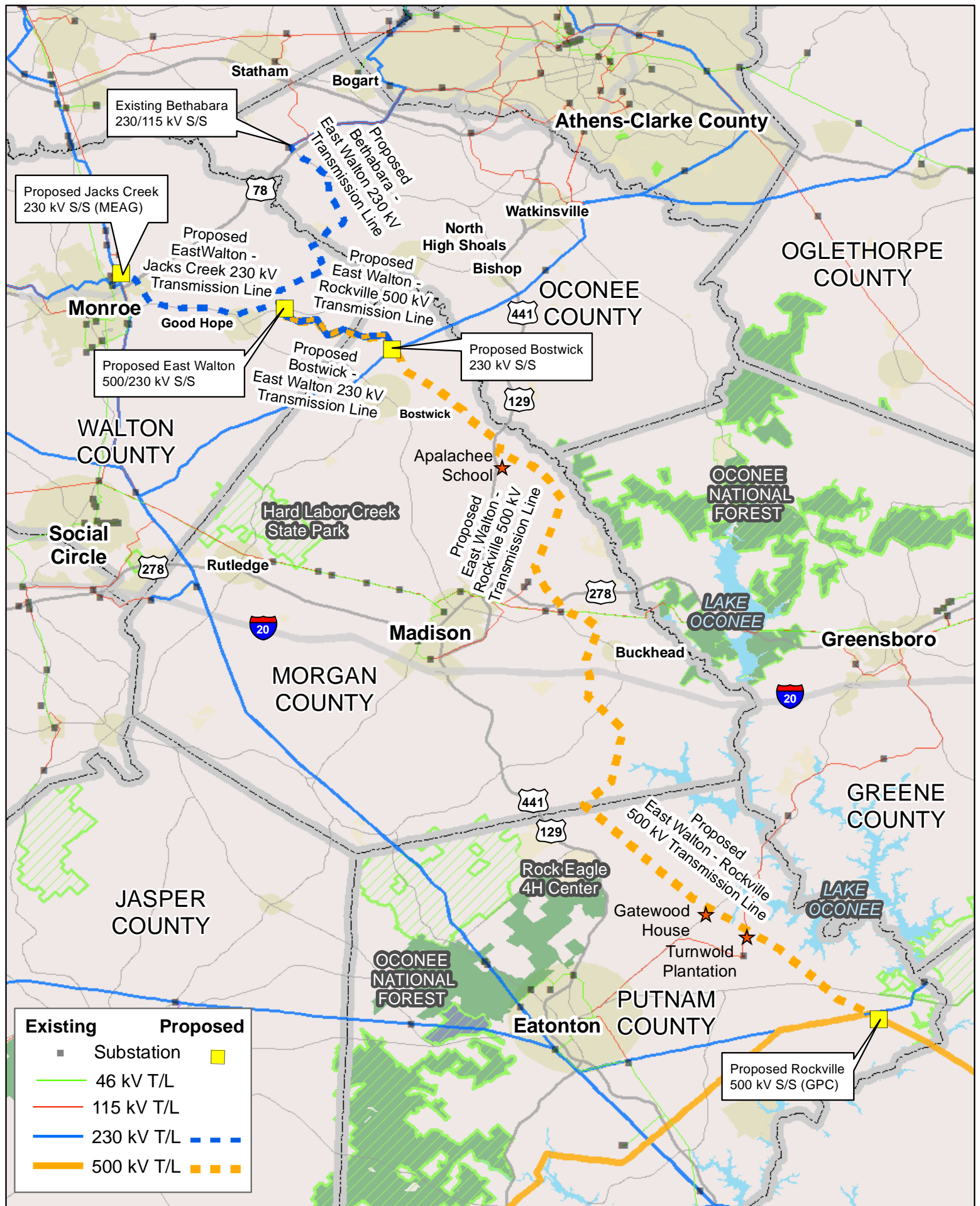
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- 2009b *Realignment of the Bethabara- East Walton 230 kV Electric Transmission Line, Oconee County, Georgia*. Addendum prepared by Prepared by Brockington and Associates, Inc., Norcross, Georgia for Georgia Transmission Corporation, Tucker.
- 2010 *Intensive Archaeological Resources Survey for the Proposed East Walton Electric Transmission Line, Putnam, Morgan, Oconee, and Walton Counties, Georgia*. Addendum prepared by Prepared by Brockington and Associates, Inc., Norcross, Georgia for Georgia Transmission Corporation, Tucker.
- 2023 *East Central Georgia Reliability Project, Morgan, Oconee, Putnam, and Walton Counties, Georgia*. Prepared by NV5, Alpharetta, Georgia for Georgia Transmission Corporation, Tucker.

CC: Gregory Korosec, PhD, RPA, Cultural Resource Specialist, USDA, Rural Development, Rural Utilities Service Environmental and Historic Preservation

Stacy Rieke, Environmental Review and Preservation Planning Program Manager, Georgia SHPO/Georgia Department of Community Affairs



From: Korosec, Gregory - RD, DC <Gregory.Korosec@usda.gov>

Sent: Tuesday, May 20, 2025 4:56 PM

To: Alexis Clark <aclark@achp.gov>; jennifer.flood@dca.ga.gov <jennifer.flood@dca.ga.gov>; Stacy A. Rieke <stacy.rieke@dca.ga.gov>; Brina Williams <brina.williams@alabama-quassarte.org>; Kristian Poncho <kponcho@coushatta.org>; syerka@ebci-nsn.gov <syerka@ebci-nsn.gov>; Section106 <section106@muscogeenation.com>; Elizabeth Toombs <elizabeth-toombs@cherokee.org>

Cc: Kopich, Suzanne - RD, MD <Suzanne.Kopich@usda.gov>; Graff, Katheryn <katheryn.graff@gatransmission.com>

Subject: [External] Notification of Emergency Undertaking pursuant to 36 CFR 800.12(b)(2) for GA110, East Central GA Reliability Project - Expedited Review

Hello,

USDA Rural Development (RD), Rural Utilities Service (RUS) under its Electric Program initiated consultation for the East Central Georgia Reliability Project on June 20th, 2023.

This project responds to the National Energy Emergency formally declared by the President of the United States on January 20, 2025, Executive Order 14156, Declaring a National Energy Emergency. In accordance with this Executive Order, the project described in the enclosed attachment(s) is an emergency undertaking which requires expedited review under 36 CFR § 800.12(b).

Consistent with 36 CFR § 800.12(b)(2), please provide any additional information or comments you may have within **seven days** to me via email or phone at (202-209-2229). Following this comment period, RUS will make a final decision and conclude Section 106.

Thank you,
-Greg

Greg Korosec, PhD, RPA
Cultural Resource Specialist
Environmental and Historic Preservation Division



U.S. DEPARTMENT OF AGRICULTURE
Rural Utilities Service, Rural Development
1400 Independence Ave SW | Mail Stop 1570
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Mobile: (202) 209-2229

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Rural Development
Rural Utilities Service
1400 Independence
Ave SW, Room 4105
Stop 1570,
Washington, DC,
20250

Date: 5/20/2025

Subject: **Notification of Emergency Undertaking pursuant to 36 CFR § 800.12(b)**
GA110, Georgia Transmission Corporation, East Central Georgia Reliability Projects
(ECGR), Morgan, Oconee, Morgan, and Walton Counties, GA

To: Advisory Council on Historic Preservation, GA SHPO, Alabama-Quassarte Tribal
Town, Cherokee Nation, Coushatta Tribe of Louisiana, Eastern Band of Cherokee
Indians, Muscogee (Creek) Nation

USDA Rural Development (RD), Rural Utilities Service (RUS) under its Electric Program initiated consultation for the East Central Georgia Reliability Projects on 6/20/2023 with the following consulting parties: GA SHPO, Alabama-Coushatta Tribe of Texas, Choctaw Nation of Oklahoma, Coushatta Tribe of Louisiana, Miccosukee Tribe of Indians, Mississippi Band of Choctaw Indians, Muscogee (Creek) Nation, Alabama-Quassarte Tribal Town, Coushatta Tribe of Louisiana, Eastern Band of Cherokee Indians, Muscogee (Creek) Nation, and the Cherokee Nation

This project facilitates the transportation of domestic energy resources. It expands the integrity and reliability of our Nation's energy infrastructure to more adequately meet our Nation's needs and therefore responds to the National Energy Emergency formally declared by the President of the United States on January 20, 2025 (Executive Order 14156, Declaring a National Energy Emergency). In accordance with this Executive Order, the project described below is an emergency undertaking which requires expedited review consistent with 36 CFR § 800.12(b). These provisions require that RUS notify the ACHP, appropriate SHPO(s) and/or THPO(s), and Indian Tribes or Native Hawaiian Organizations (NHOs) of the undertaking and provide them an opportunity to comment. This letter serves as notification of the East Central Georgia Reliability Projects.

Project Description

Georgia Transmission Corporation (GTC) (An Electric Membership Corporation) proposes to construct several transmission lines and substation facilities associated with the East Central Georgia Reliability (ECGR) Project to address the area's electrical needs.

Project components include:

- Construction of eight new transmission facility projects
- Proposed modifications to existing GTC facilities
- Proposed modifications to existing other ITS member facilities

Construction of eight new transmission facilities

New Substations:

East Walton 500/230 kV Substation – located in Walton County near the city of Good Hope. A portion of an approximately 62-acre tract will be developed for the construction of a new substation. This tract was purchased in 2009. GTC will construct and own this facility.

Bostwick 230 kV Switching Station – located in Morgan County near the city of Bostwick. A portion of an approximately 39.25-acre tract will be developed for the construction of a new substation and modifications to the existing East Social Circle – East Watkinsville 230 kV Transmission Line. The tract was purchased in 2009, while the right-of-way (ROW) for the transmission line modification was purchased in 2010. GTC will construct and own this facility.

Rockville 500 kV Switching Station – located in Putnam County and to the east of the city of Eatonton. This new substation will be constructed on land owned by GPC. GPC will construct and own the facility.

Jacks Creek 230 kV Switching Station – located in Walton County and within the city of Monroe. This new switching station will be owned by MEAG. However, GTC will construct this facility on MEAG's behalf

New Transmission Lines:

East Walton – Rockville 500 kV Transmission Line – project is approximately 46.5-miles long and located in Walton, Morgan, and Putnam Counties. Approximately 15 miles of the transmission line route in Putnam County is located within a vacant but maintained 150-foot right-of-way purchased from GPC. All additional ROWs were purchased from individual landowners in 2011 with a 150-foot-wide ROW. GTC will construct and own this facility.

Bostwick – East Walton 230 kV Transmission Line – project is approximately 5.2-miles long and located in Walton and Morgan Counties. All ROWs were purchased in 2011.

Project will be constructed adjacent to a portion of the proposed East Walton – Rockville Transmission Line corridor; the combined corridor for this segment will be 225-feet wide. GTC will construct and own this facility.

East Walton – Jack’s Creek 230 kV Transmission Line – project is approximately 7.65-miles long and located in Walton County. All ROWs were purchased in 2010. This project is mostly located adjacent to existing roadsides with a variable ROW of approximately 30-feet; cross-country ROWs are 100-feet wide. GTC will construct and own this facility.

Bethabara – East Walton 230 kV Transmission Line – project is approximately 10.2-miles long and located in Oconee and Walton Counties. The majority of the ROWs were purchased in 2013; however, some ROWs still need to be acquired. GTC will construct and own this facility.

Proposed modifications to existing GTC facilities:

Bethabara 230/115 kV Substation Modification – Terminate new Bethabara – East Walton 230 kV Transmission Line into existing substation. GTC will construct these modifications. No ground disturbing activities are anticipated outside the existing substation fence.

East Social Circle – East Watkinsville 230 kV Transmission Line Loop – Loop existing transmission line into the proposed Bostwick 230 kV Switching Station. This existing transmission line is adjacent to the Bostwick Switching Station site. GTC will construct these modifications.

East Social Circle 230 kV and East Watkinsville 230 kV Substation Modifications – Modify relaying at both substations. GTC will construct these modifications. No ground disturbing activities are anticipated outside the existing substation fence.

Doyle 230 kV and LG&E 230 kV Substation Modifications – Modify relaying at both substations. GTC will construct these modifications. No ground disturbing activities are anticipated outside the existing substation fence.

Proposed modifications to existing other ITS member facilities:

Doyle – Monroe 230 kV Transmission Line Loop – The existing GPC transmission line will be modified to terminate into the proposed Jacks Creek 230 kV Switching Station. The existing transmission line is adjacent to the Jacks Creek Switching Station site. GTC anticipates making the modifications on behalf of MEAG and GPC.

Scherer – Warthen 500 kV Transmission Line Loop – The existing GPC transmission line will be modified to terminate into the proposed Rockville 500 kV Switching Station. This

existing transmission line is adjacent to the Rockville Switching Station site.
Modifications will be made by GPC.

Previous Consultation

Letters were mailed to potential consulting parties inviting them to participate in the Section 106 process for the proposed ECGR Projects on June 20, 2023. The following Native American tribes were invited to participate in the Section 106 process:

Alabama – Quassarte Tribal Town
Cherokee Nation
Coushatta Tribe of Louisiana
Eastern Band of Cherokee Indians
Muscogee (Creek) Nation

Other parties invited to participate include:

City of Good Hope
City of Buckhead
City of Monroe
Morgan County Commission
Oconee County Commission
Putnam County Commission
Walton County Commission
Northeast Georgia Regional Commission
Middle Georgia Regional Commission
Morgan Co. African American Museum
Morgan County Historical Society
Morgan County Landmarks Society
Eatonton-Putnam Co. Historical Society
Uncle Remus Museum Association
Oconee County Historical Society
Historical Society of Walton County
Madison Morgan Conservancy
Historic Preservation Society of Social Circle
Monroe Historic Preservation Commission
Georgia Trust for Historic Preservation

Responses were received from the Middle Georgia Regional Commission and the Morgan County Board of Commissioners. To date, no other responses have been received.

Archaeological Resources

The proposed project was previously surveyed for archaeological resources between 2007 and 2010, and a series of reports were prepared at that time. A formal reevaluation of these reports was completed to address these reports' age, methodologies, and modifications to the project footprint. GTC contracted with NV5 (cultural resource consultant) to conduct a thorough review and analysis to assess the overall status of the project's regulatory compliance regarding the previous archaeological work performed as well as provide recommendations for additional survey or resurvey efforts. The original archaeologist who was involved with the original surveys conducted between 2007 and 2010, was also involved with the current archaeology survey effort. The analysis, findings, and recommendations are summarized in a memo dated June 12, 2023. This document and all others referenced in this letter are available using the following link: <https://we.tl/t-fkPwLgfxd7>.

In line with the recommendations in the memo, GTC conducted additional Phase I archaeological surveys to ensure current survey methodologies were used and surveys covered the current ECGR Project area. NV5 implemented the plan which involved resurveying some sites and surveying potential survey gaps from the previous version of the project. To determine whether there are archaeological sites listed on or eligible for listing on the NRHP, surveys included both archival research and field investigations, consisting of walkover observation and shovel testing at 30-60-meter intervals and on high probability landforms.

For the purposes of the archaeological survey, the APE was defined as the transmission line ROWs, substation and switching station sites, a laydown yard, temporary construction ROWs and the off-ROW access roads. The APE does or does not include any federal and/or tribal lands as defined pursuant to 36 CFR § 800.16(x).

The report titled, "Archaeological Resources Survey of The East Central Georgia Reliability Project Morgan, Walton, Oconee, and Putnam Counties, Georgia" dated March 2024 (<https://we.tl/t-fkPwLgfxd7>) describes the updated results of the archaeological survey of the APE. The survey identified 16 previously unrecorded archaeological sites (9MG742 through 9MG748, 9WN224 through 9WN228, and 9OC458), and three Isolated Finds in the ECGR Project survey area.

9MG746, is recommended eligible for inclusion on the NRHP. Site 9MG746 is a multicomponent scatter of precontact lithic and ceramic artifacts mixed with twentieth century artifacts in Morgan County. GTC originally identified this area as a laydown yard along the proposed East Walton – Rockville 500 kV Transmission Line. However, after the discovery of the site, GTC will not develop a laydown yard on this property.

Site 9WN227 is not recommended as NRHP eligible. However, it is a historic cemetery including human interments in Walton County. The cemetery would be preserved and avoided by

implementation of the ECGR Project. This site falls outside the proposed East Walton – Jacks Creek 230 kV Transmission Line ROW.

In addition, 22 previously recorded sites whose boundaries intersect the APE were surveyed again to assess their current condition and accurately delineate their current boundaries within the APE. Of these, only seven of the previously recorded sites were rediscovered within the APE. Of the previously recorded archaeological sites which were successfully rediscovered during the current survey, only one (9MG663) is recommended eligible for the NRHP. This site is within the proposed East Walton – Rockville 500 kV Transmission Line ROW in Morgan County. This site includes a single human grave and multicomponent scatter of precontact lithic and twentieth century artifacts. NV5 used ground penetrated radar (GPR) to ensure no additional graves were in the APE.

Effects and Management

Although Sites 9MG746, 9MG663 and 9WN227 are within or in proximity to the development of the ECGR Project transmission line ROWs, these sites will be protected during project implementation. GTC will also place these sites in GTC's archeological site monitoring program to ensure these sites are not inadvertently disturbed during future maintenance activities. Therefore, the ECGR Project is not expected to adversely affect archaeological resources in the project area.

For areas of these sites that fall within the ECGR Project ROWs, GTC clearing contractors will remove vegetation around these sites with hand clearing techniques that will involve no ground disturbance. Geotextile fabric may be incorporated, as necessary. Orange barrier protective fencing will be placed surrounding the sites to prevent inadvertent damage during the ECGR Project construction activities.

Historic Resources

Due to the age of the previous 2007 historic resource surveys, a new survey was conducted to identify any properties 50 years of age or older within the APE of the proposed project. For planning purposes, the survey date was extended to include any properties constructed in 1977 or earlier. GTC contracted with NV5 to reconduct a Historic Resource Survey (a Phase I Survey) to identify structures and make a recommendation of NRHP eligibility within the ECGR Project APE. NV5 assessed effected historic resources identified in the Historic Resource Survey (a Phase II Survey). NV5 combined their Phase I and Phase II Surveys into one report titled 'Historic Resources Survey Report and Assessment Report of Affects Recommendations - East Central Georgia Reliability Projects - June 2024' (<https://we.tl/t-fkPwLgfxd7>).

NV5 identified 302 properties. Of these, 38 were recommended eligible for inclusion on the NRHP. Three (3) additional properties within the APE are listed on the NRHP. These include:

- Turnwold Plantation
- Gatewood House
- Apalachee School

Apalachee School is located within the Apalachee Historic District, which was recommended eligible for the NRHP. Three previously identified resources were also located within the APE of the project. The Georgia Mainline Railroad and the Macon & Northern Railway were both determined eligible for the NRHP in Georgia's Railroads, 1833-2015: Historic Context and Statewide Survey, while the Bostwick Railroad/Greene County Railroad was determined to be not eligible for the NRHP.

Effects and Mitigation

In accordance with the "Programmatic Agreement Among the RUS, SHPO, and GTC", which was implemented in 2024 (<https://we.tl/t-fkPwLgfxd7>), RUS will initiate consultation with the Georgia SHPO if a proposed project will affect a National Historic Landmark, a NRHP listed historic property, a traditional cultural property, or an eligible historic district. Therefore, on December 7, 2023, GTC and RUS cultural resources staff met with the Georgia SHPO (Georgia HPD) to discuss impacts to the following properties:

- Resource 23 - Turnwold Plantation (NRHP Listed)
- Resource 25 - Wards Chapel Road Historic District (NRHP Recommended Eligible)
- Resource 29 - Gatewood House (NRHP Listed)
- Resource 148 - Apalachee Historic District (NRHP Recommended Eligible)

It was discussed that the proposed project may result in an Adverse Effect to the NRHP listed Turnwold Plantation due to the location on the plantation property and within the NRHP listed boundary. It should be noted that the vacant transmission line ROW was previously developed through this boundary, and the proposed East Walton – Rockville 500 kV Transmission Line is located within the vacant ROW. The ROW through this area is straight. Any alternatives around this historic resource would result in more 500 kV structures and potentially larger structures due to angles. Two (2) lattice steel towers will be located within the plantation NR boundary (See Figure 1). The location of these towers will minimize visual effects to the plantation home and surrounding outbuildings. GTC contracted with Merrick & Co. (Merrick) to demonstrate visibility to the proposed transmission line towers from the buildings through a 3D model developed from LiDAR data, orthophotography, and lattice tower design drawings. From these models, Merrick developed conceptual photos of the lattice towers from the plantation home (See Figures 2 and 3).



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Figure 2: Photo Rendering of view towards Proposed 500 kV Structure No. 174 from Turnwold Plantation House



Figure 3: Photo Rendering of view towards Barn and Proposed 500 kV Structure No. 175 from Turnwold Plantation House

The Wards Chapel Road Historic District is recommended to be eligible to the NRHP. The ECGR Project would result in a finding of No Effect to Wards Chapel Road Historic District as this property is located at the edge of the study area and would not be physically or visually impacted by the proposed East Walton – Rockville 500 kV Transmission Line (See Figure 4).

The Gatewood House is listed on the NRHP, it has twice been relocated and is currently on a site located far outside the APE of the project. It was determined that the ECGR Project would result in a finding of No Adverse Effect to the remaining structures formerly associated with the Gatewood House (See Figure 4).

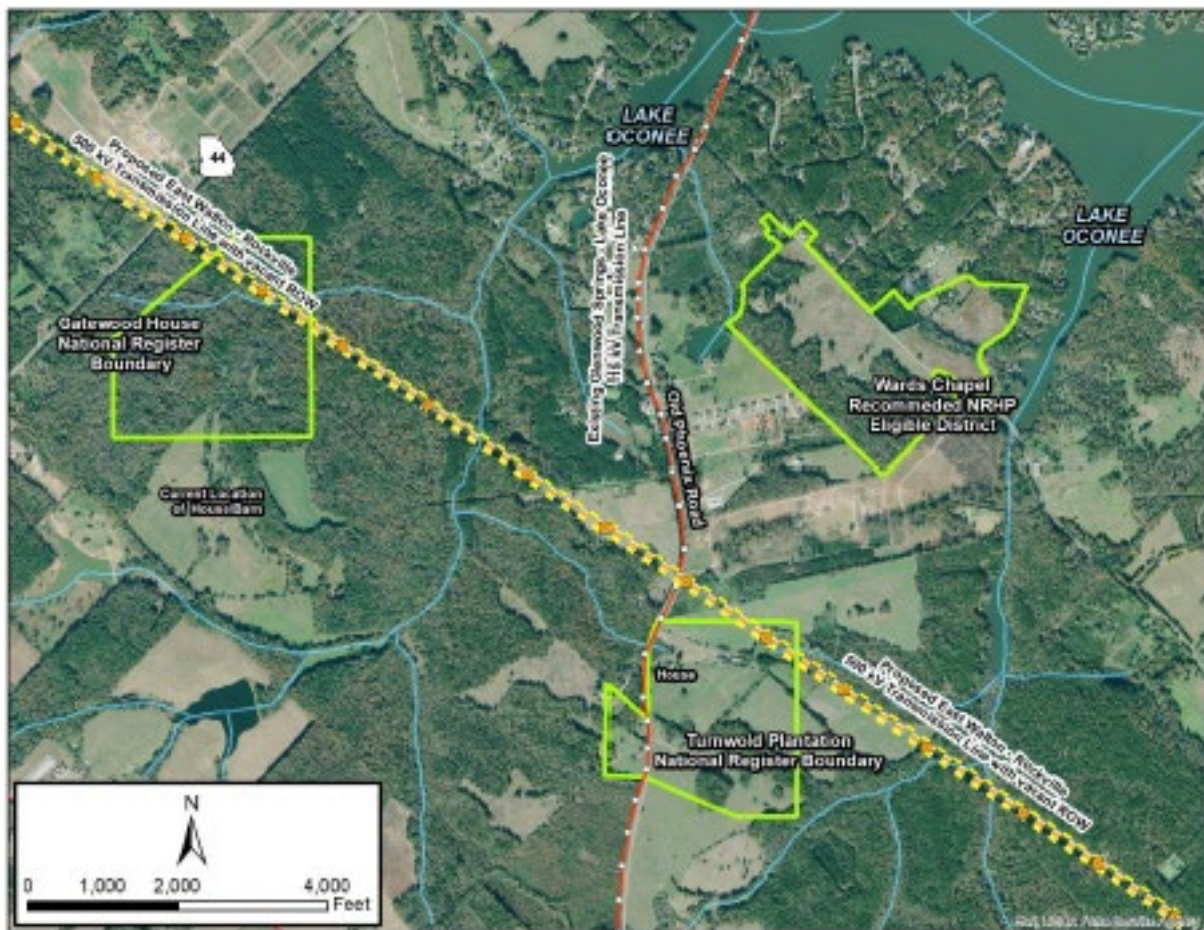


Figure 4: Turnwold Plantation NR Boundary, Gatewood House NR Boundary, Wards Chapel Recommended NRHP Eligible District

The NRHP Listed Apalachee School is located within the larger Apalachee Historic District; however, the school itself is located at the edge of the study area, and it was determined that the project would result in a finding of No Effect to the school. However, due to the location within the NRHP recommended eligible Apalachee Historic District, the East Walton – Rockville Transmission Line may have an Adverse Effect to this resource. The proposed transmission line route primarily crosses through planted pine through this historic district with no visibility to historic buildings within the district (See Figure 5)

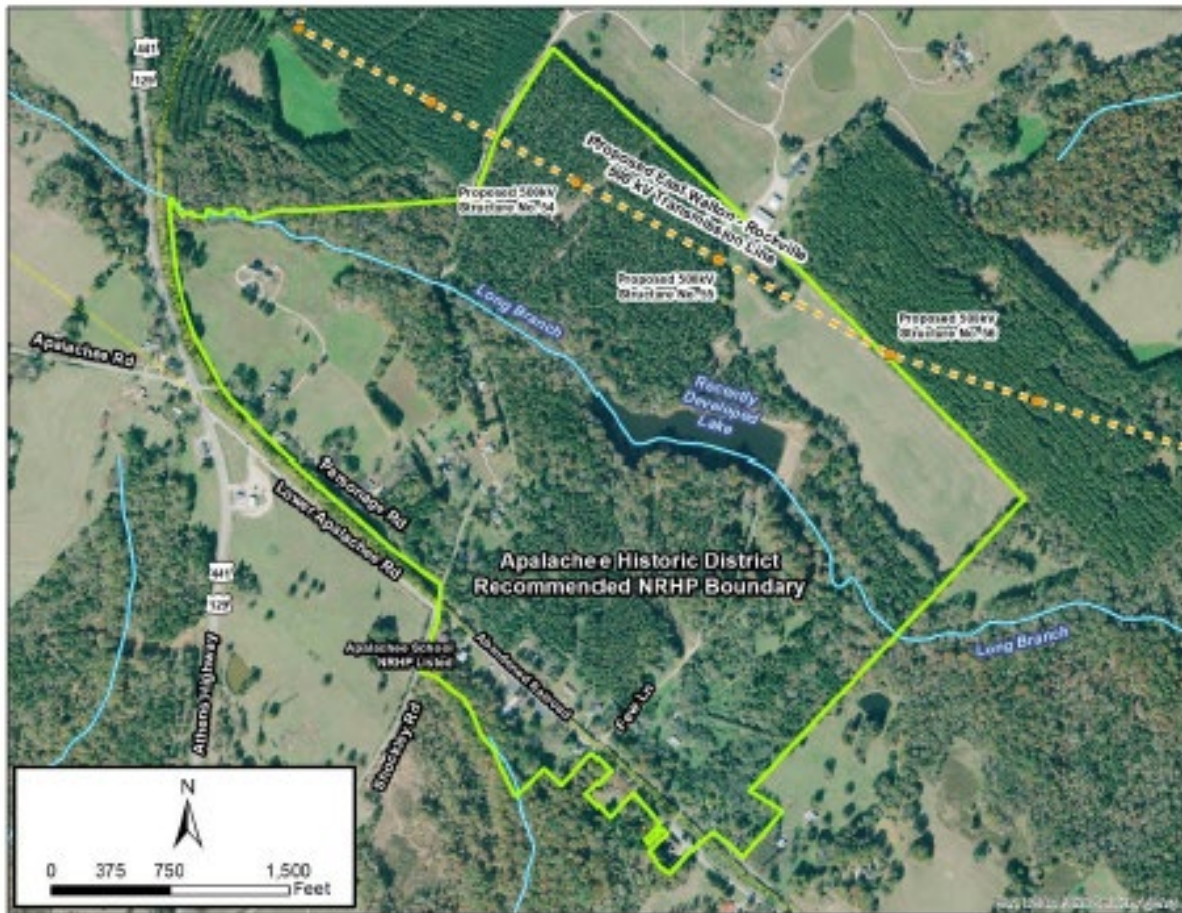


Figure 5: Apalachee Historic District - Recommended NRHP Eligible

The consultants recommended adverse effects to six (6) additional properties. These include:

- Resource 13 - a circa 1900 Gabled Ell house
- Resource 170- a 1962 Ranch House
- Resource 70 - a circa 1920 Georgian Cottage
- Resource 276- a 1930 Bungalow
- Resource 165- an 1881 cemetery
- Resource 277- a 1910 Bungalow

Based on the findings of the reevaluation dated 2023 and reports dated 2024, a finding of adverse effect (the Turnwald Plantation and the Apalachee Historic District) in accordance with 36 CFR § 800.5(b) is appropriate for the referenced project.

Mitigation

Pursuant to Executive Order 14156, Declaring a National Energy Emergency, and in consultation with the Georgia SHPO and the Advisory Council on Historic Preservation (ACHP), the standard process of executing a Memorandum of Agreement (36 CFR § 800.6(b)(1)(i-iv) and 36 CFR § 800.6(c)(6)) to resolve adverse effects is being bypassed. Instead, the mitigation for adverse effects to the Turnwald Plantation and the Apalachee Historic District are formalized in the NEPA Environment Assessment.

The detailed mitigation plan is enclosed with this letter (<https://we.tl/t-fkPwLgfxd7>). What follows is a short summary:

For physical and visual adverse effects to the Turnwald Plantation and the Apalachee Historic District resources, GTC will procure and submit to HPD (Georgia SHPO) an historic resources survey of the ECGR Project. The survey will encompass properties in Oconee, Morgan, Walton, and Putnam Counties, Georgia to include agricultural structures/buildings/resources/property types forty (40) years of age or older. All project work shall conform to the Secretary of the Interior (SOI) Standards for Archaeology and Historic Preservation, which include the Standards for Evaluation, Identification, and Registration. GTC will ensure that all survey data and digital photographs are entered in the GNAHRGIS online database. GTC will provide an electronic draft deliverable to HPD for review and comment.

The six (6) historic properties that are recommended as adverse effects in NV5's report are mitigated programmatically through the terms outlined in the previously discussed PA. The PA requires GTC to engage in programmatic mitigation measures. One of those measures is funding the FindIt Program. The FindIt Program is described on the University of Georgia (UGA) College of Environment and Design website as:

“... a state-wide cultural resource survey program sponsored by GTC in partnership with the Department of Community Affairs - Historic Preservation Division, (DCA-HPD). FindIt is housed at the Center for Community Design and Preservation (CCDP) at the College of Environment and Design (CED) at the University of Georgia and was created to help document historic resources throughout Georgia, facilitating their preservation.

FindIt began as a program in 2002 to provide data to the DCA-HPD by teaching students to identify and document cultural resources. Students are trained to locate historic structures and perform fieldwork including architectural identification, mapping, and data analysis. The program serves as one component of GTC’s environmental review requirements and provides support to the university through the funding of staff positions and graduate assistantships. This partnership creates a student learning experience that is unavailable elsewhere on campus. Students can experience fieldwork first-hand, having surveyed over 60 Georgia counties and cities thus far.” - <https://ced.uga.edu/psd/findit/>.

As another mitigation measure, GTC sponsored the development of The Ranch House in Georgia: Guidelines for Evaluation, published in May 2010.

GTC is currently involved in a research project to develop an historic context for Georgia’s electric grid.

Compliance with NHPA and 36 CFR § 800.12(b) does not supersede the obligations of RUS, its Borrowers/Awardees, or other Federal agencies to comply with other applicable state, Tribal, and Federal laws regarding the protection and treatment of inadvertently discovered archaeological material and human remains, including but not limited to the Native American Graves Protection and Repatriation Act (codified as amended at 25 U.S.C. §§ 3001-3013), and its implementing regulations (codified at 43 CFR §10). If any potential human remains and/or archaeological resources are discovered during ground disturbing activities, Georgia Transmission Corporation will immediately cease construction in the immediate vicinity and notify RUS, who will notify the appropriate SHPO/THPO, land managing agency (if any), and Tribes or NHOs, as applicable.

Consistent with 36 CFR § 800.12(b)(2), please provide any additional information or comments you may have within **seven days** to Greg Korosec via email at Gregory.Korosec@usda.gov or 202.209.2229. Following this comment period, RUS will make a final decision and conclude Section 106.

Sincerely,

James F. Elliott

James F. Elliott
Deputy Assistant Administrator
Electric Program
Rural Utilities Service, Rural Development
United States Department of Agriculture

Enclosures (<https://we.tl/t-fkPwLgfxd7>):

1. Archaeology Survey Plan Memo
2. Archaeology Resource Survey
3. Historic Resource Survey and Assessment
4. Mitigation Plan
5. GA SHPO Response
6. Tribal Letters
7. Section 106 Initiation Letters
8. Section 106 Initiation Letter Responses